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Date: 6 December 2024

Dear Mayor Khan,

Borough Parking Charges

On 4 December 2024, London Councils Transport and Environment Committee completed a review of the parking charges applicable on borough roads and have instructed me to seek your approval for a number of changes to the charges. A copy of the committee report and the public consultation analysis report, considered by the committee in reaching its decision can be found at:

[Transport and environment committee \(TEC\) meetings | London Councils – Home](#)

I have enclosed a copy the committee report with this letter. The report has been shared with GLA officers.

Parking Penalties:

The Committee determined that the current Band A and Band B arrangement should remain in place.

The committee determined that penalty levels in both Band A and Band B parking penalties should increase to the following amounts:

Band	Current Higher Level	New Higher Level	Current Lower Level	New Lower Level
Band A	£130	£160	£80	£110
Band B	£110	£140	£60	£90

An increase of £30 for higher level differential charges would bring the Band A charges in-line with the penalty level utilised by TfL on the TLRN and would re-establish a level of consistency across London. Lower-level charges would also increase by £30 to keep the difference between higher and lower charges at the existing £50.

Bus Lane and Moving Traffic Penalties

Bus Lane and Moving traffic penalties are currently enforced at the Higher-Level Band A amount of £130. The committee determined that these penalties should also increase to £160. This is the level enforced by TfL on the TLRN and would again give parity across London when enforcing the same contraventions.

It should be noted that the current London Lorry Control Scheme penalty levels for Operators and Drivers will remain unchanged.

Additional Parking Charges

The committee determined that charges for vehicle removal, clamping, storage, and ultimate disposal that have not changed since 2007 should be increased to the following amounts:

Additional Parking Fees	Current Amount	New Amount
Release from Wheel Clamp	£70	£100
Release from Car Pound	£200	£280
Storage Fee	£40 per day	£55 per day
Disposal Fee	£70	£100

Discounts and Surcharges

The committee agreed that the current discount for prompt payment of penalty charges should be maintained at 50%.

The committee determined that the current surcharge for late payment of parking penalties should remain at 50%.

Future Working with TfL and Lobbying

London Councils will be seeking to work collaboratively with TfL on any future penalty level consultations and will be actively lobbying Central Government to amend legislation and automatically increase penalty levels in line with inflation over a designated period of time to reduce the unnecessary burden on both Local and Central Government.

Next Steps

I should be grateful for your approval, therefore, of the changes in the levels of charges set out in this letter.

The Committee would be grateful for your approval for these changes as soon as possible, to enable implementation to take place in April 2025. Subject to your approval, and the one-month period the Secretary of State has to potentially veto the decision, changes will need to be advertised at least three weeks in advance.

Should you require any further information, please do not hesitate to contact me.

Yours sincerely



Stephen Boon
Chief Operating Officer – London Councils

London Councils' Transport and Environment Committee

London Parking and Traffic Enforcement Penalty Charges Consultation: Recommendations and Analysis

Item no: 11

Report by: Mital Patel

Job title: Transport Officer

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Summary:

In 2023, London Councils undertook a major review of the parking and traffic enforcement penalty charges in London for the first time since 2010. This was on the following:

- Band A and Band B (two-tier regime) in London
- Current levels of Penalty Charge Notices (PCNs) for Parking, Bus Lane, and Moving Traffic contraventions
- Additional fees related to Removals (for parking and abandoned vehicles); Wheel Clamping; Storage and Disposal
- Discount payment arrangements and Surcharges (currently 50%)

The consultation commenced on 31 July 2023 and ran for a consecutive 12 weeks and ended on 23 October 2023.

This report makes recommendations for members regarding levels of penalty charges, additional fees and rates for the next four years. It considers the main themes identified by the consultation.

This report should be read alongside **Appendix 1: 'London Parking and Traffic Enforcement Penalty Charges Consultation Analysis Report December 2024'**, which provides more detailed consideration of matters raised by the consultation respondents.

Recommendations:

The Committee¹ is recommended (subject to the Mayor of London's approval and there being no veto by the Secretary of State) to:

- Note the full results and analysis of the public consultation carried out by London Councils on the proposed changes to Parking and Traffic Enforcement Penalty Charges in London, as shown in *Appendix 1* of this report.
- Agree to keep the current Band A and Band B two-tier regime in place
- Agree the level of parking penalties to be set at:
 - Band A, Higher Level = £160
 - Band A, Lower Level = £110
 - Band B, Higher Level = £140
 - Band B, Lower Level = £90
- Agree the penalty charge for Bus Lane and Moving Traffic contraventions on borough roads be the same as the highest penalty charge for Parking in Band A = £160
- Agree the Discount rate (which is applied to all penalties if they are paid within 14 days of issue of the relevant penalty charge notice) continue to be set at 50%
- Agree the level of Surcharge for Parking contraventions (which is applied to all penalties that remain unpaid in full at the end of the relevant period) continue to be set at 50%
- Agree the additional parking related fees are set to:
 - Release fee from wheel clamp = £100
 - Release fee from car pound = £280
 - Daily storage fee = £55 per day
 - Disposal fee = £100
- Authorise the publication of any necessary notices in respect of the charge levels
- Agree to seek to work collaboratively with Transport for London (TfL) and look to jointly consult on parking and traffic charges in the future to ensure consistency. If this is not possible, ensure that the 32 London boroughs and City of London's penalty charge levels and fees are reviewed every four years as a minimum.
- Agree that London Councils' officers lobby National Government to seek changes in legislation that would allow for automatic inflation linked increases in penalty charges and additional parking related fees.

¹ No TfL representative on TEC may take part in the proceedings of TEC relating to setting penalty charge levels on borough roads (Reg. 24(2) of the Civil Enforcement of Road Traffic Contraventions (Approved Devices, Charging Guidelines and General Provisions) (England) 2022)

Background

1. Under the provisions set out in the Traffic Management Act 2004 (TMA 2004) Section 77 & Schedule 9, and Regulation 24 of the Civil Enforcement of Road Traffic Contraventions (Approved Devices, Charging Guidelines and General Provisions) (England) 2022 (which repealed similar provisions in the Road Traffic Act 1991), London Councils' Transport and Environment Committee (TEC) is responsible, subject to agreement by the Mayor of London and possible veto (refusal) of the Secretary of State (SoS) for Transport, for setting enforcement charges on borough roads.
2. These parking enforcement charges, and additional fees include:
 - penalties for contraventions of the parking regulations (under the TMA 2004) and including any discounts and surcharges
 - release from wheel clamps
 - vehicles removed from the street and impounded
 - vehicle storage and disposal fees
3. TEC also has the responsibility for:
 - setting penalty levels in respect of bus lane contraventions (under the London Local Authorities Act [LLA Act] 1996)
 - setting penalty levels in respect of moving traffic contraventions; one-way streets; banned turns and yellow box junctions etc (under the London Local Authorities and Transport for London Act [LLA and TfL Act] 2003)
 - setting penalty levels in respect of the London Lorry Control Scheme (under the LLA and TfL Act 2003)
 - setting the rate of discount which applies to the early payment of all penalties within 14 days of issue and the rate of surcharge for parking contraventions (under the TMA 2004), which applies to the late payment of penalties. The discount and surcharge rate has been set at 50%.
4. It should be noted that surcharges for bus lane penalties under the LLA Act 1996 and moving traffic penalties under the LLA and TfL Act 2003 are set at 50% in the Schedules of these Acts, respectively.
5. There are requirements to consult on parking and traffic enforcement penalty charges and additional parking fees either in statute or in statutory guidance.
6. Under the TMA 2004 the SoS's 'Statutory Guidance for Local Authorities on the Civil Enforcement of Parking Contraventions 2022' states that

"The primary purpose of penalty charges is to encourage compliance with parking restrictions. In pursuit of this, enforcement authorities should adopt the lowest charge level consistent with a high level of public acceptability and compliance."
7. It is also TEC's policy that parking, bus lane, and moving traffic penalty charges that are enforced under the same powers should be set in such a way as to produce a coherent pattern of policy across London.

8. Historically, London Councils had undertaken a public consultation to review parking and traffic enforcement charges every four years. However, following statements from the SoS in successive Governments since 2010 that they would not support an increase in parking and traffic enforcement charges, London Councils has not sought to either jointly (with TfL) or independently consult on the level of charges since 2010.
9. It has been 13 years since the London boroughs and City of London's (referred to as 'the boroughs' from this point on) penalty charges in London were last reviewed; and there is evidence of a correlation between an increase in non-compliance and the perception that PCNs are not set at sufficient levels to be viewed as a 'financial' deterrent by some motorists to not to contravene road traffic regulations.
10. In December 2021, following a recommendation from TfL, the Mayor of London approved an increase in PCNs for parking and stopping; bus lane and moving traffic contraventions on the Transport for London Road Network (TLRN) from £130 to £160 (an increase of 23%). This was the first increase to PCNs in London since 2011.
11. The consultation also agreed the proposed new penalty charge would continue to be reduced by 50% if paid within 14 days and to be increased by 50% following non-payment after a period of 28 days for all parking penalty charges, (and bus lane and moving traffic alike).
12. The changes on the TLRN were not subject to objection by the SoS and as this was not a joint consultation with TfL, the penalty charges for London boroughs and City of London (referred to as 'the boroughs' from this point on) remained unchanged at £130 for higher-level contraventions, a lower level than that on the TLRN. This situation undermines the 'consistency' policy objective of this committee.

Current Parking and Traffic Enforcement Charges

13. Following a review in 2006, differential penalty levels within bands were introduced to distinguish between more serious contraventions where parking is not permitted such as yellow lines or parked in a designated disabled bay without displaying a valid Blue Badge (classified as 'higher level' penalties), and less serious contraventions where parking is permitted but regulations have been contravened such as overstaying on a pay and display bay or parked outside the markings of the bay (classified as 'lower level' penalties).
14. In 2010 (the last review), the only change approved, saw an increase in the penalty charge for higher level parking contraventions, as well as bus lane and moving traffic contraventions. These increased from £120 to £130 within Band A, and from £100 to £110 within Band B, all subject to 50% discount for payments made within 14 days. Lower level (Band A and Band B) penalties have not changed since 2007.
15. The current on (and off-street) parking penalty charges applied by boroughs under the Traffic Management Act 2004 are as follows:

Differential Penalty Levels	Higher Level	Lower Level
Band A	£130	£80
Band B	£110	£60

16. Band A areas have traditionally been concentrated in central London and urban town centres where the pressures on parking and congestion are often greatest, and Band B areas fell outside of central London where pressures were not as significant.
17. Due to increasing issues with non-compliance, an increasing number of outer London boroughs with higher density parking and significant Controlled Parking Zones have applied to become Band A areas over time, *(please refer to 'Figure 1 Current Parking Bands' on page 8 of this report)*.
18. As with any changes to London-wide penalty charges, localised borough Band change requests also require approval from the Mayor of London and the SoS has the power to veto any request.
19. Bus Lane and Moving Traffic contraventions are set at:

Bus Lane (under the London Local Authorities Act 1996)	£130
Moving traffic (under the London Local Authorities and Transport for London Act 2003)	£130

20. Additional parking charges/fees* are set at:

Release from wheel clamp	£70
Release from car pound	£200
Storage fee	£40 per day
Disposal fee	£70

**These fees have not increased since 2007*

The Consultation:

21. The consultation commenced on 31 July 2023 and ran for 12 weeks ending on 23 October 2023.
22. It was made available on the London Councils' website and publicised for full exposure in the weekly e-subscription of the 'Key Issues' newsletter and on social media channels (Twitter and LinkedIn).
23. London Councils also provided an easy-read version of the consultation and in British sign language on our public website for those with accessibility needs.
24. The consultation was open to responses from individuals, as well as the boroughs; businesses; charities and any other groups who wished to respond in an 'official' capacity. Details of the consultation were sent to key stakeholders and transport interest groups. The full details have been published in **Appendix 1** of this report.
25. The total number of responses to the consultation was 2,034 (including easy-read submissions).

26. The below table provides an overview of the types of responses received in total:

Total number of 'Individual' responses	1,914
Total number of 'London Resident' responses (including those that were 'unsure')	1,641
Total number of Residents living 'outside' of London responses	141
Total number of 'Borough' responses	25
Total number of responses from Organisations/Businesses (Stakeholders)	95

27. It should be noted that although London Councils received a total of 2,034 responses, not all respondents contributed to every question asked and a small number of respondents gave conflicting information in relation to the preliminary 'general background' details asked (*refer to Questions 1 to 7 in Appendix 1, pages 8 to 16*).

28. Some questions within the consultation were 'skipped' by respondents, although there were some 'mandatory' elements of the consultation, therefore some of the examples outlined in the body of this report and within **Appendix 1** will not add up to a total of 2,034.

29. Some boroughs responded more than once to the consultation. London Councils has removed any obvious 'duplications' but has considered responses that are from separate 'directorates' within the boroughs. Details of specific 'directorates' were not asked for, so London Councils is unable to confirm this information, but most borough responses were from the Traffic and Parking teams.

30. In addition, a small number of respondents, whether individuals or identifying themselves as a stakeholder, did not answer some of the background information consistently, (*refer to Questions 1, 5 and 6 in Appendix 1 pages 8 to 14*). London Councils has not corrected any inconsistencies in compiling this report.

31. London Councils' officers have reviewed all the responses received from the consultation. The remainder of this report will be divided into sections that consider the areas that were consulted on. These have been set out in the following structure for ease of comprehension²:

- **Band A and Band B, Two-Tier Regime (*only applicable to Parking*)** – this section considers whether to retain a two-tier regime, or to replace it with a single London-wide parking band.
- **Parking, Bus Lane and Moving Traffic Contravention PCNs** – this section considers several aspects of penalty charges:
 - i. Band A and Band B charging levels
 - ii. Within Band A and Band B, the higher and lower charging levels

32. In this section, the consultation considered three possible options related to the charging levels for contraventions. The first option was for no change with two further options proposing an increase to the charges at various levels (respondents could make alternative suggestions e.g., for a decrease in charges in free text responses).

² NB this structure does not strictly follow the structure of the consultation questions, but is presented as described above to allow similar matters to be logically grouped for decision-making purposes.

33. These elements have been detailed in this report under the following sub-headings:

- i. The options under consideration
 - ii. The case for no change or a decrease in penalty levels
 - iii. The case for an increase
 - iv. The rationale behind our recommended option
- **Additional 'Parking' Fees** – this section of the paper considers additional parking fees related to:
 - i. Release from a wheel clamp
 - ii. Release from a pound
 - iii. Vehicle storage fees
 - iv. Vehicle disposal fees
- **'Discount Rate' for Early Payment and the 'Charge Certificate Surcharge Rate' for Late Payment of Parking Penalties³** – early and late payments respectively, are considered in this section:
 - i. 50% discount rate for early payment
 - ii. 50% surcharge rate for late payment for parking penalties under the TMA 2004 only.
- **Additional Parking Fees** – this section of the paper considers additional parking fees related to:
 - i. Release from a wheel clamp
 - ii. Release from a pound
 - iii. Vehicle storage fees
 - iv. Vehicle disposal fees
- **Future Joint Consultations with TfL**
- **Lobbying for Regular Inflationary Increases in Penalty Levels**

³ Note that surcharge rates for bus lane penalties under the LLA Act 1996 and moving traffic penalties under the LLA and TfL Act 2003 are set at 50% in the Schedules of these Acts, respectively.

Band A and Band B, Two-Tier Regime (*only applicable to Parking*)

34. The first matter under consideration was the current two-tier banding regime for parking penalties. Below is the current Band Map of London. It identifies those boroughs that are wholly Band A or Band B, and those that have adopted a 'localised' combination of the two:

Figure 1 Current Parking Bands



35. Since 2011, an increasing number of outer London boroughs have successfully adopted Band A penalty charges by demonstrating that they have an ongoing compliance issue within their borough. Between 2012 and 2023 a total of 11 boroughs have changed from Band B to Band A and a further two boroughs have recently sought Mayoral approval. This leaves a third of London as wholly or partly Band B.
36. Questions 10 and 11 (***see Appendix 1, pages 21 to 24***) sought the views on a single band and opinions were split, with a small majority of those with a definitive view (784 out of 1,547) suggesting 'No' to the proposal. The most cited reason for the lack of support being the increased financial impact, with a total of 115 (9%) respondents out 1,350 highlighting this as their main concern.
37. Despite the increase in boroughs applying for Band A over the last decade, London Councils does not recommend the adoption of a single band (Band A) at this stage.
38. London Councils believes that abandoning the two-tier banding regime would remove the future local flexibility to deal with issues relating to non-compliance. Band B boroughs will continue to have the option to apply for Band A status if they can clearly demonstrate that despite any increased penalty charge levels introduced (because of this or any future consultations) they have not seen improved compliance of the parking rules and regulations.

39. More importantly, adopting a single band at Band A for all boroughs at this stage, in addition to a proposed change in penalty charge levels across London, would represent a larger increase in the levels for existing Band B authorities.
40. If a single band were to be adopted, together with any further increases in the overall penalty levels across London, the value of a Band B, lower-level PCN for example would nearly double.
41. ***London Councils' recommendation is to keep the current Band A and Band B two-tier regime in London.***

Parking, Bus Lane and Moving Traffic Contravention PCNs

The options under consideration:

42. The table below and on *page 10* of this report, set out all the options that were under consideration as part of the consultation in relation to penalty levels for parking, bus lane and moving traffic contraventions⁴:
- **Option 1:** Stay the same (i.e. no change)
 - **Option 2:** Increase Band A, higher level penalty charges to align with those charges in place on the TLRN and increase all other charges by the same percentage amount (23%)
 - **Option 3:** Increase all charges in line with inflationary increases between 2011 and 2024 (43.6% higher level inflationary figure)
43. It should be noted that **all** the values listed in the rest of this report represent the maximum charges and that some amounts have been rounded up or down to nearest the 'ten', and to ease division for the purposes of 50% discounting and surcharging i.e., produce amounts that end in 'five' or 'zero'.

Option 1: Stay the same (i.e. no change)

Penalty Charge Levels	Band A (Higher)	Band A (Lower)	Band B (Higher)	Band B (Lower)
Option 1: Stay the same	£130	£80	£110	£60
Current Discount at 50%	£65	£40	£55	£30
Current Surcharge at 50%	£195	£120	£165	£90

⁴ See Appendix 1: Questions 13, 14, 19, 20, 21 and 22

Option 2: Increase of 23% equivalent (to align with PCNs now in place on the TLRN)

Penalty Charge Levels	Band A (Higher)	Band A (Lower)*	Band B (Higher)*	Band B (Lower)*
Option 2: Increase of 23% equivalent (to align with PCNs now in place on the TLRN)	£160	£100	£140 (actual amount £135.30)	£80 (actual amount £73.80)
Option 2: Discount at 50%	£80	£50	£70 (actual amount £67.65)	£40 (actual amount £36.90)
Option 2: Surcharge at 50%	£240	£150	£210 (actual amount £207.65)	£120 (actual amount £116.90)

*Not applicable to TfL, as it does not have a Band A, lower level charge nor does it have a Band B charge at higher or lower level.

Option 3: Increase of 43.6% in line with Inflation (using the Bank of England Inflation calculator) since 2011 to September 2024

Penalty Charge Levels	Band A (Higher)	Band A (Lower)	Band B (Higher)	Band B (Lower)
Option 3: Increase of 43.6% in line with Inflation since 2011 to September 2024	£180 (actual amount £186.68)	£110 (actual amount £114.88)	£160 (actual amount £157.96)	£90 (actual amount £86.16)
Option 3: Discount at 50%	£90 (actual amount £93.34)	£55 (actual amount £57.44)	£80 (actual amount £78.98)	£45 (actual amount £43.08)
Option 3: Surcharge at 50%	£270 (actual amount £280.02)	£165 (actual amount £172.32)	£240 (actual amount £236.94)	£135 (actual amount £129.24)

44. Question 13 (see **Appendix 1, pages 27 to 32**) gave respondents the opportunity to select an option they preferred but also make suggestions as to how the penalty charges should change, if they did not agree with any of the three options provided.

45. As a result, London Councils has developed other options for members to consider. These are variations on the options to increase listed above. These are presented below and illustrated in the tables below:

- **Option 4:** Band A and Band B higher levels increased by 23% equivalent to align with the penalty charges now in place on the TLRN and Band A and Band B lower levels increased to a level that is £50 lower than the revised higher level.
- **Option 5:** Band A and Band B higher levels increased by 43.6% in line with the rate of inflation and Band A and Band B lower levels increased to a level that is £50 lower than the revised higher level.

Option 4: Increase of 23% equivalent to align with PCNs on the TLRN for Higher Level PCNs and retain the £50 difference between Higher and Lower Level PCNs

Penalty Charge Levels	Band A (Higher)	Band A (Lower)*	Band B (Higher)*	Band B (Lower)*
Option 4: Increase of 23% to align PCNs on the TLRN with a £50 difference for Lower Level PCNs	£160	£110	£140 (actual amount £135.30)	£90
Option 4: Discount at 50%	£80	£50	£70 (actual amount £67.65)	£45 (actual amount £36.90)
Option 4: Surcharge at 50%	£240	£150	£210 (actual amount £207.65)	£135 (actual amount £116.90)

Option 5: Increase of 43.6% in line with Inflation (using the Bank of England Inflation calculator) since 2011 to September 2024 and retain the £50 difference between Higher and Lower Level PCNs

Penalty Charge Levels	Band A (Higher)	Band A (Lower)	Band B (Higher)	Band B (Lower)
Option 5: Increase of 43.6% in line with Inflation since 2011 to September 2024 with a £50 difference for Lower Level PCNs	£180 (actual amount £186.68)	£130	£160 (actual amount £157.96)	£110
Option 5: Discount at 50%	£90 (actual amount £93.34)	£55 (actual amount £57.44)	£80 (actual amount £78.98)	£45 (actual amount £43.08)
Option 35 Surcharge at 50%	£270 (actual amount £280.02)	£185 (actual amount £172.32)	£240 (actual amount £236.94)	£155 (actual amount £129.24)

The case for no change or a decrease in penalty levels:

46. Responses to question 13 showed that 743 of the 1,639 respondents do not want to see **any** change to the current PCN levels across London to improve 'parking' behaviours. 394 of the 1,639 respondents provided additional commentary. Of these, the largest number (122 respondents) suggested there should be a decrease in penalty levels.
47. Furthermore, the most commonly cited concern (40 respondents) was the financial burden that this would have on their cost of living and on those on lower incomes.
48. One individual said

"Increasing in line with inflation when wages haven't increased, we're having discussions about heating or eating and more people are living in poverty now than ever before is in bad taste. It should stay the same".

49. Whilst another individual said

“Increasing penalty charges at a time where inflation is already high will only exacerbate the impact. The penalty is a deterrent. It should not factor in inflation. It is not a good service. Neither is it the basis to recoup costs. As such, increasing the penalty must be based on sound evidence”.

50. Thirteen stakeholders, shared their opinions on whether the parking penalty charges should be raised to encourage behaviour change with four suggesting that rates should be decreased (**see Appendix 1, page 32**).

51. Question 14 (**see Appendix 1, pages 32 to 34**) of the consultation asked respondents what the impact would be on them if the ‘parking’ penalty charges were to increase. 1,233 respondents answered this question. The largest single group of responses (178) suggest there would be no impact. However, the next biggest single group (151) expressed that they would not be able to afford to pay the PCN if they were to increase. The third biggest group (144) said that it was bad timing due to the cost of living crisis, with one individual saying that it would

“leave a serious hole in my pension”.

52. Fifty-five stakeholders responded to this question, with seven highlighting the concerns that this would have a negative impact on their business (**see Appendix 1, page 34**).

53. The Federation of Small Businesses informed us that

“London members/small businesses cannot afford any increase in costs in any shape or form as the cost of doing business in the capital is already very high and at especially at a time of cost of living crisis and higher interest rates”.

54. Questions 19 to 22 (**see Appendix 1, pages 48 to 56**) respondents were asked a series of questions about ‘bus lane and moving traffic’ penalty charges, including how an increase would impact them and a total of 1,143 responses were received, including 57 from the stakeholder.

55. Question 22 itself received a total of 172 responses, including 7 stakeholder’s primary concern was once again the financial implications that an increase would have on their affordability to pay the PCN, (**see Appendix 1, pages 54 to 56**).

56. One individual said that increases in the bus lane and moving traffic PCNs

“would be another tax on the poor and working class”

57. Another stakeholder commented

“This is ridiculous. TfL and local authorities have almost bankrupted London, crippled our roads and thus impaired trade productivity. It’s not about penalty charges, the problem is bad management.”

58. It is apparent that the main concern of individuals and stakeholders alike, is the cost of a PCN for parking, bus lane and moving traffic contraventions, even at their current levels.

59. But there is also evidence to suggest that there is a shared perception of the management and enforcement of parking and traffic in London as a 'money making' scheme or 'tax' on society and not fit for purpose.
60. Regarding increase in parking PCNs, The Midi Music Company (a charity) commented

"More pressure on the finances of the working classes as always instead of providing adequate parking around train stations, shops and high streets. London should take a look at Sydney's excellent transport infrastructure that allows you to park and ride, with adequate levels of car parks without being overcharged. The government wants drivers to uphold the car industry but provides inadequate parking for people to actually use their cars. More streets have resident parking only hence the increase in fines issued, plus so many more streets were closed during the pandemic without consultation, with the introduction of school roads, which have also added to the increase in fines issued. It's just a vicious circle and charging drivers more money is not going to solve the problem."

61. In relation to increases in bus lane and moving traffic PCNs, the same charity said

"More pressure for this who cannot afford it without the benefits of seeing an improved parking and traffic infrastructure. The answer to the problem is not charging more money"

62. The responses to these themes and all of the issues raised in the consultation is provided in **Appendix 1: London Councils' Considerations of Issues Raised on pages 67 to 149.**

The case for an increase:

63. Ninety-five per cent of the road network in London is managed by the boroughs, and with around two billion car journeys made each year, parking and traffic management is integral to maintain the movement of traffic and safety of all road users. Any form of enforcement that involves penalties, is meant to act as a deterrent, encourage positive behaviour change and increase compliance. Therefore, the PCNs must be set at a level that makes the borough road networks safer, for all London residents and visitors.
64. There are several reasons in favour of a change to the penalty charge levels. The first is that the current 'value' of a higher-level penalty charge in London (which include bus lane and moving traffic PCNs) is 43.6% less than it would be if it had been adjusted to keep pace with inflation since the last amendment in 2011. This was undertaken using the Bank of England Inflation calculator that checks how prices in the UK have changed over time. A link to the calculator has been provided below:

<https://www.bankofengland.co.uk/monetary-policy/inflation/inflation-calculator>

65. This is referred to in this report as being reduction in value in '*real terms*' or the '*comparative level*'. This equates to the following amounts:

	Penalty Level 2011	Comparative Level 2024
Band A (Higher)	£130	£90.48
Band B (Higher)	£110	£76.56

66. The penalty charge for lower-level parking contraventions, have not been amended since 2007. Therefore, the current value of PCNs is 64.1% lower in real terms. This equates to the following amounts:

	Penalty Level 2007	Comparative Level 2024
Band A (Lower)	£80	£48.75
Band B (Lower)	£60	£36.56

67. Since the last review, the value of penalty charges in real terms across decriminalised parking and traffic enforcement has decreased. When these levels were last set in 2011 and 2007 respectively, it was agreed by this committee, the Mayor of London and were not subject to a veto by the SoS so they struck the right balance between affordability and acting as a deterrent.
68. Current PCN levels have not been reviewed since 2010, and since then, parking and traffic contraventions have increased. Boroughs have indicated that complaints relating to anti-social and obstructive parking have increased over the years.
69. There is also awareness that some freight and logistic operators are prepared to absorb PCN costs as an operating cost rather than complying with the restrictions, as stated in the Mayor of London's decision on 'TfL Proposal to increase Penalty Charge Levels on the TLRN' (see link below).

<https://www.london.gov.uk/decisions/md2913-tfl-proposal-increase-penalty-charge-levels-tlrn>

70. This was echoed in London Councils' consultation, with some respondents in the freight and logistics industry indicating that they will either pass on or absorb the cost of the PCN because they need to be able to park near to an address for the delivery of goods.
71. This is a strong indication that the PCNs are not set at a high enough level to deter poor behaviours amongst all motorists.
72. In addition to this, it has been reported that in certain boroughs, motorists will risk getting a PCN rather than opting to pay for parking for a whole day, in accordance with the restrictions on the road. This is because in some cases, it is cheaper to pay a PCN at the discounted rate than it is to pay for parking.

73. Westminster City Council (WCC) shared their concerns in the consultation, saying

“Increased PCN charges should encourage greater compliance by motorists, as the higher penalty charges should help deter wilful non-compliance. It is the case, for example, that in some zones of Westminster it is cheaper to pay a PCN at its discount rate than to pay to park compliantly for a full day’s kerbside parking or in a privately-run off-street facility”.

74. WCC further added

“Although it would appear logical that higher PCN charges would result in greater revenue for the City Council, this may not necessarily be the case if the deterrent aspect of the charging increase meant that issue volumes were then to drop. We may though expect to see any reduced PCN revenue offset by increased levels of compliant parking through pay-to-park and permit payments. As increased PCN charges should encourage greater compliance, this would hopefully translate to greater safety for motorists, pedestrians, cyclists and other road users, as motorists would hopefully be less inclined to leave vehicles parked in dangerous and inappropriate locations”.

75. The City of London Corporation (CoLC) echoed the above sentiment saying

“We believe that the penalty charge notice for parking charges should increase to bring the Higher Level penalty in line with the charge on the TLRN, i.e. an increase from £130 to £160. It is important that there is a consistent level of parking charge between the TLRN and CoLC streets, as the difference is often not recognised or understood by most motorist”.

76. In addition to the above, CoLC added that it is experiencing

“an increase in motorists who park in a payment bay without payment and deliberately receive and pay a PCN, as it is cheaper than paying to park all day, therefore we welcome the introduction of an increased PCN to deter those motorists...the increase in the penalty charge notice amount would help the CoLC combat dangerous and inconsiderate parking across the Square Mile, through a more significant financial deterrent. Currently, this does not exist as the PCN level is not sufficiently high”.

77. Paid for parking tariffs in the CoLC vary, but typically on-street parking charges for most vehicle types is £7.20 per hour and in some cases £10 per hour. A penalty charge paid at the discounted rate for a Band A, lower level contravention is £40 and a penalty charge paid at the discounted rate for a Band A, higher level contravention is £65. Therefore, for some individuals, parking in contravention or overstaying the maximum stay etc. is a legitimate financial option.

78. The second reason for a change is that since the penalty levels were last reviewed, there has been an overall decline in compliance. This is considered partly attributable to the deterrent of receiving a penalty diminishing. Penalties need to be set at a sufficient level to achieve legitimate public policy goals and encourage positive behaviour from motorists and the benefits that this has on congestion, road safety and air quality.

79. The table below sets out the number of PCNs issued for Parking, Bus Lanes and Moving Traffic since 2010 and April 2024.

Year	All Band A/B Higher/Lower-Level Parking PCNs	Bus Lane PCNs	Moving Traffic PCNs	Total PCNs Issued	Year on Year Increase/Decrease
2010 - 2011	4,022,476	216,495	571,190	4,810,561	N/A
2011 - 2012	4,131,738	233,201	564,028	4,928,967	118,406
2012 - 2013	4,041,423	242,541	608,156	4,892,120	-887,544
2013 - 2014	4,079,702	254,677	650,207	4,984,586	92,466
2014 - 2015	3,816,696	266,210	657,882	4,740,788	-243,798
2015 - 2016	3,348,951	330,279	980,058	4,659,288	-81,500
2016 - 2017	3,539,432	351,174	1,235,679	5,126,285	466,997
2017 - 2018	3,665,727	348,998	1,596,639	5,611,364	485,079
2018 - 2019	3,804,343	378,016	1,769,884	5,952,243	340,879
2019 - 2020	3,952,118	400,973	1,829,348	6,182,439	230,196
2020 – 2021*	2,903,979*	289,265*	2,091,631*	5,284,875*	-897,564*
2021 - 2022	3,879,990	336,917	3,250,890	7,467,797	2,182,922
2022 - 2023	4,100,177	313,351	3,182,003	7,595,531	127,734
2023 - 2024	4,560,690	319,357	3,453,439	8,333,486	737,955

*An overall reduction in PCNs throughout London due to national lockdown restrictions and reduced enforcement during the Covid 19 pandemic in 2020-2021.

80. Bus Lane and Moving Traffic contraventions have generally increased year-on-year since 2010, and by 73% over the period 2010-2023 as more boroughs gradually adopted the powers to enforce these restrictions. Much of this would be the enforcement of more safety critical locations, and the introduction of localised schemes, such as Low Traffic Neighbourhoods and Healthy School Streets over the last five years.

81. The vast majority of boroughs that responded to the consultation indicated that an increase in the level of penalty charge would encourage greater compliance with the restrictions, improve road safety, reduce congestion and encourage a modal transport shift.

82. The London Borough of Sutton said

“Whilst costs may increase due to rising prices this does not necessarily mean penalties should also increase in the same way. Penalties need to be fair, consistent and reflective of the offences being committed. When, as with parking penalty charges, penalties are not regularly reviewed, and the environment landscape changes, it can lead to penalties no longer being reflective of the changed environment.”

83. LB Sutton went on to add

“We are aware that the cost of living crisis has created pressure in household finances for our residents and all residents in London. Through fair and consistent enforcement, with a focus on education, referral to debt assistance programmes (such as Breathing Space) and application of discretion in appeals, where appropriate, we would seek to assist those motorists committing contraventions. We would hope an increase in penalty charges would lead to a greater deterrent for offences being committed in the first.”

84. London Councils' consultation shows that out of 55 stakeholders, a majority supported an increase in 'parking' PCNs to act as a deterrent, which supports boroughs objectives in managing parking and improving road safety, (**see Question 14, Appendix 1, page 34**).

85. The London Borough of Barking & Dagenham in response to the consultation on increasing penalty charges said that they support

“any changes that will encourage compliance, safer motoring and we see this as an opportunity to provide a healthier borough”.

86. **Question 14 (see Appendix 1, pages 32 to 34)** and **Question 22 (pages 54 to 56)**, respondents were asked about the impact of increasing the parking and bus lane and moving traffic penalty levels respectively. The largest single groups of responses 178 of 1,233 and 212 of 1,143 respondents, (*respectively*) stated that an increase in the highest penalty charge levels would have no impact on them, with one individual respondent saying that an increase would not impact them but:

“seeing how frequent parking rules are flouted - higher charges should act as a better deterrent”.

87. The third consideration is that over the last 13 years, the costs associated with managing enforcement services such as back-office processing, outsourced contracts, staffing, postal services etc. have increased significantly.

88. For example, the London Borough of Hackney's consultation response indicated that their costs have increased by 57.9% from £4.2m in 2010/11 to £6.1m in 2023 for the enforcement contract alone.

89. The fourth reason for change is concern about dangerous/inconsiderate parking behaviours and recognition that active travel would be safer for pedestrians and cyclists and create better accessibility to the road network for the most vulnerable groups if motorists' behaviours improved.

90. **Question 15 (see Appendix 1, pages 35 to 37)** asked if they are concerned about the level of dangerous and inconsiderate parking, approximately 50% of respondents (813 out of 1,657, including all 25 borough respondents) indicated that they were concerned..

91. Five-hundred-and-five respondents, including stakeholders provided additional comments, with the largest single group of responses (56) highlighted parking on pavements and fourth largest (37) suggesting they wanted to see increased levels of enforcement.

92. One individual said

“In my area I have noticed that cars often park at the ends of cycle lanes, thereby blocking there [sic] use for cyclists which breaches rule 243 of the Highway Code. I also notice that people increasingly park on yellow lines when they are ‘just popping into a shop’. They seem to think that blocking traffic for what they no doubt think is a short period of time is acceptable.”

93. Six out of 21 stakeholders said they shared a concern, with The Brewery Logistics Group commenting

“Legal and unenforced parking has a detrimental effect on HGVs ability to access the kerbside to enable safe deliveries when unloading and loading.”

94. Better Streets for Havering said that they are

“often tagged into social media posts of inconsiderate parking in the borough”.

95. London Councils’ responses to these themes and all of the issues raised in the consultation is provided in **Appendix 1: London Councils’ Considerations of Issues Raised on pages 67 to 149.**

The rationale behind our recommended option:

96. London Councils does recognise the issues raised earlier in this report under the sub-heading ‘The case for no change or a decrease in penalty levels’ and these views have been taken into consideration in the recommendations that are being proposed.

97. Officers do acknowledge that most respondents indicated that they would prefer to see no increase. However, officers also note that a PCN is meant to act as a deterrent and increase compliance levels. This in turn improves the safety for all road users, reduces congestion and journey times as more obstructions to free-flowing traffic would decrease.

98. In addition, enforcement helps to improve air quality and promotes active travel and modal shift, as the experience of walking and cycling becomes more viable options in a pleasant and safe environment. This supports the long-term objectives within the Mayor’s Transport Strategy, which is adopted by the boroughs as part of their own Transport Strategies.

99. Parking enforcement helps to safeguard some of the more vulnerable motorists such as Blue Badge holders, so that they can get easier access to disabled bays, whilst aiding the freight sector by ensuring that there is sufficient space on the carriageway to allow for loading and unloading, safely and efficiently.

100. Furthermore, PCNs are only issued to motorists that have failed to comply with the parking and traffic regulations, and contrary to some respondents’ assertions, it is not a ‘tax’ or charge on every motorist in London. If the parking and traffic regulations are followed as prescribed within the relevant legislation, a motorist should not receive a PCN.

101. Finally, there are mitigations in place that can help alleviate the cost of non-compliance to motorists and that provide them with the opportunity to challenge if they feel that penalty charges have been issued unfairly.
102. Motorists who accept liability for a contravention and do not wish to challenge a PCN, have the option to pay it within 14 days to get a 50% discount (see *paragraphs 150 to 155 of this report*). And, if an individual or organisation/business believes that they have unfairly or incorrectly received a PCN, they have the right to challenge the borough that issued it.
103. If unsuccessful, the borough's decision can be appealed to an independent adjudicator at London Tribunals. The rate of success for appeals has not changed significantly over the last 14 years. For example, the proportion of parking appeals allowed in 2010/11 was 50.48% and 48.74% in 2023/24. Were boroughs simply issuing more, but less reliable and incorrectly issued penalty charge notices, one would expect the proportion of appeals allowed in favour of the appellant to reflect this, but it does not.
104. However, weighing up the arguments for and against, it is not considered that keeping the penalty at the current level is consistent with the wider public policy objective of successfully managing road traffic in London, given the devaluation of the financial deterrent in real terms as previously outlined.
105. It is considered that the current penalty charge levels are too low and recommends that an increase is required to improve compliance with parking and traffic regulations.
106. Nevertheless, officers do not believe that Options three or five (*variations on an inflationary increase as shown on pages 10 and 11 of this report*) are appropriate. While an increase of 43.6% in line with inflation for higher level PCNs would bring the current PCNs in line with today's market value/price, officers consider that such a significant increase is not appropriate, as it:
- Would be higher than the penalty level on the TLRN and undermine consistency across London; and
 - Could have a greater detrimental impact on payment and recovery rates than the recommended increased level, as more motorists may struggle to afford to pay and therefore seek to avoid payment.
107. This last factor is even more pronounced in respect of lower contraventions. Band A, lower and Band B, lower level PCNs have not changed since 2007. The actual increase in inflation since then (using the Bank of England Inflation calculator) is 64.1%.

108. Therefore, if these were to be brought in line with inflation since 2007, the actual value of these PCNs in today's market, would equal to (noting that these lower levels do not apply to TfL):

Penalty Charge Levels	Band A (Lower)	Band B (Lower)
Current Value	£80	£60
Increase of 64.1% in line with Inflation since 2007 to September 2024	£130 <i>(actual amount £131.28)</i>	£100 <i>(actual amount £98.46)</i>

Values have been rounded up or down, to ease division for the purposes of discounting and surcharging.

109. This report acknowledges and has taken into consideration the impact of the pandemic on the economy and hardship that many people and businesses have faced as a result and the current cost of living crisis, which has been identified as a common theme in our consultation responses.
110. Nevertheless, officers consider that Options two and four (*as outlined on pages 10 and 11 of this report*) strike a better balance. Both have the advantage of making higher-level penalty levels consistent with the TLRN and therefore bring consistency across London.
111. Both of these options would see an increase in Band A and Band B, higher level parking charges, Bus Lane and Moving Traffic PCNs equivalent to that now in operation on the TLRN (equating to 23%). There is no difference in either the severity of these contraventions, or the potential impacts of non-compliance between TfL and boroughs, so it is reasonable that these penalty levels should be the same.
112. Therefore, the only remaining decision in this section of the report relates to the level of lower-level contraventions.
113. Question 12 (***see Appendix 1, pages 24 to 27***) sought the views on the difference in value between the higher and lower level penalty charges for both Band A and Band B. 763 out of 1,772 who responded to this question want the difference of £50 to remain. Whilst 784 suggested that they did not want the difference to remain at £50, keeping it at this amount was significantly the majority preference.
114. Therefore, Option four (*see page 11 of this report*) is recommended. This option is a combination of applying TfL's 23% increase to all the higher level PCNs and setting the lower level parking PCNs at a level that is £50 below the higher-level amount.
115. This would increase PCNs to new levels that strikes a sensible 'balance' between the real need for an increase in penalty charge levels and the consideration of financial concerns raised by many respondents. At the same time, it also makes up for some of the devaluation in the lower level PCNs for parking contraventions.
116. ***The recommendation is for Band A and Band B higher levels to be increased by 23% equivalent to those charges in use on the TLRN and Band A and Band B lower levels increased to a level that is £50 lower than the revised higher level (see Option Four on page 11 of this report).***

Additional Parking Fees

117. Questions 17 to 18 (*see Appendix 1, pages 40 to 47*) of the consultation asked respondents about the levels of additional parking fees. The tables below sets out the current fees and the options for change⁵ for the boroughs to consider. These represent the maximum charges (values have been rounded down, as demonstrated):

Option 1: Increase of 43.6% in line with Inflation since 2011 to September 2024 for all Additional Parking Fees (using the Bank of England Inflation calculator):

Additional Fees that can be associated to Parking Contraventions:	Current Amount:	Increase of 43.6% in line with Inflation since 2011 to September 2024
Release from Wheel Clamp	£70	£100 (actual amount £100.52)
Release from Car Pound	£200	£280 (actual amount £287.20)
Storage Fee	£40 per day	£55 per day (actual amount £57.44)
Disposal Fee	£70	£100 (actual amount £100.52)

118. As with Band A and Band B lower level PCNs, the additional parking fees outlined above have not changed since 2007. If these were increased in line with inflation, the actual value of each fee in today's market is illustrated in the table below:

Option 2: Increase of 64.1% in line with Inflation since 2007 to September 2024 for all Additional Parking Fees (using the Bank of England Inflation calculator):

Additional Fees that can be associated to Parking Contraventions:	Current Amount:	Increase of 64.1% in line with Inflation since 2007 to September 2024
Release from Wheel Clamp	£70	£115 (actual amount £114.87)
Release from Car Pound	£200	£330 (actual amount £328.20)
Storage Fee	£40 per day	£65 per day (actual amount £65.64)
Disposal Fee	£70	£115 (actual amount £114.87)

119. The largest number of respondents (761 out of 1,601) suggested that additional parking fees should all remain the same, 491 indicated that they should all increase in line with the rate of inflation and 349 suggested they should change by another amount, (*see Appendix 1, page 40*).

120. Three-hundred-and-forty-six respondents provided additional comments, with the largest single group (96, including two stakeholders of the 15 that provided comments) suggesting fees should decrease, (*see Appendix 1, pages 41 to 45*).

⁵ There is an option for boroughs not to change the fees.

121. An individual who opted for different amounts but did not actually provide any alternative, other than to say

“Just STOP clamping, removing, scrapping and harassing the public”.

122. The Licensed Taxi Drivers Association also opted for different amounts and added

“Any increase would potentially negatively impact hardworking drivers who spend a large amount of time on the road and occasionally make well meaning, mistakes. If the fees were to increase these mistakes could become extremely costly and damaging for drivers impacting their ability to making a living and support their families”.

123. However, a range of other views were expressed, with one individual who thought that the fees should stay the same, saying:

“Only my sense of fairness, as the current fees should more than cover the costs involved, and if they don’t, then the councils need to become more efficient, not pass on the cost of their inefficiency to motorist, or try to profit from the misery of others.”

124. One individual respondent said increasing the additional parking fees

“might deter drivers from leaving vehicles badly parked”

125. Southwark Living Streets said

“hopefully the streets would be safer for people walking.”

126. It is worth noting that **only** 18 London boroughs operate a removal service and have access to a vehicle pound (either their own or through a contractor/third party) for storing vehicles that have been found to be in contravention.

127. On average, these boroughs are removing four vehicles a day (using 2023 to 2024 total removal figures of 26,196 as an example, as shown in the table below and continued on *page 23* of this report). These four removals generates a total of £800 in removal fees and in some cases, vehicles are not collected by the registered keepers due to their low net worth and therefore, the boroughs may get back on average £150 in scrap value instead, in an attempt to breakeven.

Year	Removals	Clamping
2007 - 2008	87,770	48,753
2008 – 2009	65,662	9,832
2009 – 2010	51,239	10,054
2010 – 2011	47,982	8,782
2011 – 2012	48,931	8,875

Year	Removals	Clamping
2012 – 2013	45,987	8,273
2013 – 2014	40,226	1,656
2014 – 2015	35,673	22
2015 – 2016	35,722	6
2016 – 2017	30,536	4
2017 – 2018	26,657	9
2018 – 2019	26,523	10
2019 – 2020	24,427	3
2020 – 2021	13,791	0
2021 – 2022	20,924	112
2022 – 2023	26,187	0
2023 – 2024	26,196	15

128. Therefore, all boroughs that operate a removals service will generally prioritise high risk vehicles (e.g. causing an obstruction or parked in a disabled bay without a valid Blue Badge or a lost/stolen or fraudulent badge on display). This is in line with London Councils' guidance.
129. Some boroughs will also remove vehicles that are classed as 'persistent evaders' (those vehicles with three or more outstanding PCNs).
130. However, the majority of these boroughs and those that only have access to removal trucks but no car pound, will choose to relocate vehicles to another street within their borough as an alternative solution. This means that a relocated vehicle would **only** ever incur a PCN for the alleged contravention and **no** further additional fees would be applied.
131. WCC has said that they
- “no longer operate a clamping or removal regime, and only relocates vehicles in certain instances to an alternative kerbside location on the basis of a PCN but without further charge. However, were we to ever reinstate secondary enforcement practices, it would be logical to assume that increased charges would help to deter non-compliance, but for those vehicles having been removed, higher cumulative storage charges could result in more vehicles being left in the car pound and thus more requiring disposal”.*
132. It has been identified by the boroughs that operational costs associated with the removal of vehicles, such as leasing a car pound; removal trucks; on-board Civil Enforcement Officers (CEOs) and cashiers; back-office processes have increased to such an extent that they are no longer covered by the charges levied.

133. Any existing borough-owned/in-house car pounds are running at a loss, and many have since closed and outsourced to contractors or third parties much further afield to save on expenses. These are often 'shared-use' car pounds to reduce contractual costs.
134. The boroughs have informed London Councils that the cost of leasing a removal truck through a contractor, is on average between £500 and £700 per day (depending on its size) and does not include the cost of the on-board CEOs carrying out the removal duties.
135. The London Borough of Lambeth said
- "As the costs of running our parking operations increase with inflation there could be a danger that we would not be able continue to fund transport improvements in the borough. As inflation rises the value of the fine reduces, this reduced the punitive effect. Lower fines may encourage people to flout rules and use the fine as a way to park cheaply. Currently storage fees do not reflect the cost to our service".*
136. Some boroughs have stated that the 'threat' of additional enforcement action (such as removal and clamping) with a penalty set at a sufficient level would improve overall compliance and discourage dangerous and inconsiderate parking.
137. The clamping of vehicles has seen a real decline over the last decade (as shown in the table on pages 22 and 23 of this report) and the majority of boroughs no longer operate a clamping service.
138. When clamping is used, it is only as an alternative option for enforcement teams if a removal truck cannot get to a vehicle parked in contravention that may also be classed as a persistent evader.
139. One individual who had opted for the fees to remain the same, said
- "If people consistently break the rules and do not pay the penalty, then further action is warranted, up to and including scrapping their vehicle".*
140. Whilst both vehicle removals and clamping are less common, they remain a crucial part of enforcement options for parking and traffic management and any fees associated with the provision of this service, should not only act as a further deterrent to the PCN but should also be financially sustainable for the boroughs to continue to operate these services.
141. It is acknowledged that there is an increasing problem with uninsured vehicles, often without valid MOT, road tax or cloned number plates and there is wide recognition that there are multiple benefits for boroughs to be able to continue to provide these additional services to their community to help ensure the vehicles are road worthy, and help reduce crime and anti-social behaviour.
142. Vehicles are only removed or clamped if a motorist has failed to comply with the parking regulations, and it is not a further 'tax' or charge on every motorist. Anyone who believes that they have had their vehicle removed or clamped unfairly or wrongly, has the right to challenge the borough that carried out the enforcement action.

143. If unsuccessful, they can appeal the decision to an independent adjudicator at the London Tribunals. If the parking and traffic regulations are followed as prescribed within the relevant legislation, a motorist should not fall victim to having their vehicle removed or clamped.
144. Question 18 (**see Appendix 1, pages 45 to 47**) shows that when asked what the impact of increased fees would be, the largest single group, (247 out of 1,074) of respondents, including stakeholders indicated that they would not '*generally*' be impacted if the fees were to increase and a 104 said that they would comply with the parking restrictions and therefore they would not affect them if they were to increase.
145. Fifty-four responses were provided by the stakeholders in relation to the impact on them if any increases were to be made. 12 showed support for this, saying that it would act a greater deterrent and increase compliance and 9 said that they would not '*generally*' be impacted (**see Appendix 1, page 47**).
146. Although it is recognised that Option two - increasing the fees by 64.1% inflation (*see page 21 of this report*), would bring all the fees in line with today's market value/price, we do not think that this option is appropriate and is too high an increase.
147. This reflects the consideration which has been given to the impact of the pandemic that many people and businesses have faced as a result and the continued hardship of a cost of living crisis, which has been identified as a 'common' theme in our consultation responses. It is considered that an increase which reflected 64.1% inflation would not pay sufficient regard to impacts on these particular categories of motorists.
148. Again, as set out in the rationale initially outlined in *paragraph 106* of this report, it is considered that Option two represents too much of an increase. However, for those limited boroughs to continue to provide this fundamental road safety-centred service, the fees need to be set at levels that can absorb 'some' of the devaluation over the last 17 years.
149. The responses to these themes and all of the issues raised in the consultation is provided in **Appendix 1: London Councils' Considerations of Issues Raised on pages 67 to 149**.
150. By way of comparison from elsewhere, in April 2023, following a consultation on the '*Charges for removal, storage and disposal of vehicles under road traffic law*' the Home Office increased their fees for various category/type of vehicles. See one example of some of the increases they applied:
- The removal charge for a standard private car not substantially damaged: is £192 (previously £150) but increases to £320 (previously £250) for a substantially damaged car.
 - If the private car is not recovered from the police compound, then the daily storage charge is: £26 (previously £20)
 - If the private car is never recovered then the disposal charge is: £96 (previously £75)
151. The additional fees for vehicle clamping, removal, storage and disposal in London are no different and need to be set at a higher level to ensure there continued effectiveness.

152. In addition to the above, the fees should be set at levels that allow boroughs to recover reasonable costs (and act as a deterrent (much like the PCN itself)) to promote compliance of the parking regulations. This will have a positive impact the safety for all road users, reduce congestion and reduce journey times as more obstruction to free-flowing traffic is reduced – again, supporting the concerns as demonstrated by the respondents to our consultation.
153. ***The recommendation is for an increase of 43.6% in line with Inflation since 2011 to September 2024 for all the additional parking fees (see Option One on Page 21 of this report).***

‘Discount Rate’ for Early Payment and the ‘Charge Certificate Surcharge Rate’ for Late Payment of Parking, Bus Lane and Moving Traffic Contravention Penalties.

154. Questions 23 and 24 (***see Appendix 1, pages 57 to 61***) showed mixed opinions as to what percentage these two rates should be. The largest group (635 of 1,538 of respondents) want the *discount* rate to stay at 50%, with the second largest group (575) wanting it to be more than 50%. 289 respondents suggested it should be less.
155. Questions 25 and 26 (***see Appendix 1, pages 62 to 66***) asked for opinions in respect of the surcharge. the largest group (641 of 1,523) favoured a reduction with 561 suggesting it remain at 50%. Arguments for making discount rate higher and the surcharge lower tended to focus on issues of cost and fairness.
156. The responses to these themes and all of the issues raised in the consultation is provided in ***Appendix 1: London Councils’ Considerations of Issues Raised on pages 67 to 149.***
157. London Councils believe that the fairest apportionment for a decrease in early payment and an increase for late payment of parking PCNs is 50%, supported by TfL’s decision not to seek a change to their discount and surcharge rates in 2022.
158. Note that surcharges for bus lane penalties under the LLA Act 1996 and moving traffic penalties under the LLA and TfL Act 2003 are set at 50% in the Schedules of these Acts, respectively.
159. ***The recommendation is that the discount and surcharge rates both remain at 50%.***

Future Joint Consultations with TfL

160. Historically, consultations looking at penalty charge levels and additional parking fees have been undertaken jointly with TfL. If Members agree to a level that replicates those currently in use on the TLRN, London Councils is seeking Member agreement that we seek to work with TfL on any future proposed increases, through a combined consultation and implementation process. This would ensure continued future parity and consistency. Any changes would be subject to Mayoral approval and possibly veto by the SoS.
161. If a joint consultation is not feasible, London Councils would seek to review the penalty charges on borough roads and additional fees, a minimum of every four years.

Lobbying for Regular Inflationary Increases in Penalty Charge Levels

162. The process of undertaking a periodic public consultation on penalty charge levels, drafting reports and seeking approval from the Mayor and advising the SoS (who has power of veto) is a resource intensive and expensive task.
163. London Councils seeks Member approval to lobby Central Government to amend the legislative requirement to consult on penalty charge levels, and seek the relevant approval, to one that allows levels to increase in line with inflation over a determined period of time (e.g., every year, two years, four years etc..)
164. This would see levels naturally increase without the unnecessary burden on both Local and Central Government.

Next Steps:

165. After TEC agree the new penalty charges and fees at this meeting, the Mayor of London and Secretary of State's approval is needed before the changes can be publicised and enacted.
166. London Councils and the boroughs will need to formally notify members of the public about any changes. We will provide draft notices outlining these changes to borough officers at a later date for them to publish on their own communication platforms and London Councils will also publish in the London Gazette, undertake a press release and utilise a range of platforms including social media, to advise of the change.

Financial Implications for London Councils

- i. There will be costs associated with printing copies of the consultation analysis report for those that are unable to access it online and for those that may require it in different formats due to disabilities. It is not anticipated that these costs will be significant.
- ii. There will be costs associated with the actual advertising of any agreed changes to the penalty charge levels and fees in the London Gazette.

Legal Implications for London Councils

- iii. These are included in the body of the report.

Equalities Implications for London Councils

- iv. As per section 149 of the Equality Act 2010, London Councils carried out a stage one Equalities Impact Assessment relevance test prior to the commencement of the consultation and did not find that any group with the protected characteristics would be adversely affected by the proposals, (***see Appendix 3 of Appendix 1, pages 176 to 181 of this report***).
- v. The consultation results will be made available, upon request, in a variety of formats including large print and Braille.

Background Papers

- vi. There are no background papers

Appendices

- vii. Appendix 1: London Parking and Traffic Enforcement Penalty Charges Consultation Analysis Report December 2024

**London Parking and Traffic Enforcement
Penalty Charges
Consultation Analysis Report
December 2024**



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Executive Summary

London Councils is the collective of local government in Greater London, representing all 32 boroughs and the Corporation of London (referred to as the 'boroughs' in this report) across policy sectors to deliver London's shared goals and objectives.

Between 31 July 2023 and 23 October 2023, we held a public consultation seeking views on our proposals to increase the Penalty Charge Notices (PCNs) for people who fail to follow the parking, bus lane and moving traffic rules on the roads managed by the boroughs. These proposals also sought the view on increasing other additional parking fees and on the current discount and surcharge rates applied to PCNs, in terms of early and late payments.

We received a total of 2,034 responses to the consultation. Of these, 1,914 were from members of the public (referred to as 'individuals' in this report); 25 were from the boroughs and 96 were from other stakeholder groups.

A detailed analysis of the responses and comments received can be found in London Councils' Consideration of Issues Raised section of this document on page 67 onwards.

The information contained in this report has been presented to London Councils' Transport and Environment Committee (TEC), the Mayor of London and the Secretary of State for Transport to help decide whether to support our proposals.

Following careful consideration of the consultation responses, London Councils is recommending to:

1. Keep the Band A and Band B parking areas
2. Increase the differential penalty levels for Parking to:
 - i. Band A, Higher Level = £160
 - ii. Band A, Lower Level = £110
 - iii. Band B, Higher Level = £140
 - iv. Band B, Lower Level = £90
3. Increase the penalty charge for Bus Lane contraventions to £160
4. Increase the penalty charge for Moving Traffic contraventions to £160
5. Increase the additional Parking related fees to:
 - i. Release fee from Wheel Clamp = £100
 - ii. Release fee from Car Pound = £280
 - iii. Daily Storage fee = £55 per day
 - iv. Disposal fee = £100
6. Keep the Discount rate of 50% for all penalty charges paid early, within 14 days of issue
7. Keep the Surcharge rate of 50% for all parking penalties that remain unpaid in full at the end of the relevant period.

Purpose of Consultation

Under the Traffic Management Act 2004 (TMA 2004), Section 77 & Schedule 9 and Regulation 24 of Civil enforcement of Road Traffic Contraventions 2022, London Council's TEC has the responsibility for setting parking and traffic enforcement charges on borough roads, subject to agreement with the Mayor of London and the Secretary of State.

TEC also has the responsibility for:

- setting penalty levels in respect of bus lane contraventions (under the London Local Authorities Act [LLA Act] 1996)
- setting penalty levels in respect of moving traffic contraventions; one-way streets; banned turns and yellow box junctions etc (under the London Local Authorities and Transport for London Act [LLA and TfL Act] 2003)
- setting penalty levels in respect of the London Lorry Control Scheme (LLCS) (under the London Local Authorities and Transport for London Act 2003)
- setting the rate of discount which applies to the early payment of all penalties within 14 days of issue and the rate of surcharge for parking contraventions under the TMA 2004 which applies to the late payment of penalties. The discount and surcharge rate has been set at 50%.
- It should be noted that surcharges for bus lane penalties under the LLA Act 1996 and moving traffic penalties under the LLA and TfL Act 2003 are set at 50% in the Schedules of these Acts.

It has been 14 years since parking, bus lane and moving traffic penalty charges were last reviewed by the TEC (in 2010) and there is evidence of a link between failure to follow the rules and PCNs being seen as a 'financial' deterrent by motorists.

95% of the road network in London is managed by the boroughs, and with around two billion car journeys made each year, parking and traffic management is essential for maintaining the movement of traffic and safety of all road users.

London Councils wanted to review how parking and traffic management can continue to be most effective in delivering some of its key benefits, such as improving road safety for all London residents and visitors, through promoting positive behaviour change from motorists, reducing congestion and journey times as more obstructions to free-flowing traffic and reducing carbon emissions.

Please refer to *Appendix 1 Background Information Supplied to Respondents* to see full details of the background information to London Councils' consultation. The questions we asked are presented in the main body of this report. See also *Appendix 2: Stakeholder Engagement List 2023*.

Summary of Responses to the Consultation

London Councils received a total of 2,034 responses to our consultation.

Points to note:

- 1) Although London Councils received a total of 2,034 responses, not all respondents contributed to every question asked and a small number of respondents gave conflicting information in relation to the preliminary 'general background' (*Questions 1 to 7 of this report*). Therefore, some of the information is slightly skewed in terms of the respondents actual demographic grouping.
- 2) Some questions within the consultation have been 'skipped' by respondents, as not all the questions asked had 'mandatory' elements.
- 3) Some boroughs responded more than once to the consultation. London Councils has removed any obvious 'duplications' but has considered responses that are from varying 'directorates' within the borough in question.
- 4) Some respondents (whether individual or identifying themselves as an organisation/business) did not answer some of the general background (*Questions 1, 5 and 6 of this report*) correctly, albeit a minority. Therefore the data collected for the purposes of this report is true to what was submitted and London Councils has not made any adjustments based on any assumptions on behalf of the respondents.
- 5) Where you see any information within this report blocked out with: [REDACTED], this is because a response contains personal data and London Councils has (under the Data Protection Act 2018) redacted that piece of information.
- 6) The consultation questionnaire asked 26 questions in total, comprising of 13 'closed' ended questions and 13 'open' free text questions. This report presents analysis of all 26 questions asked.
- 7) Not all of the 2,034 respondents provided an answer to every open free text question.
- 8) The number of responses to each open free text question is presented in the table '*Responses received by open question asked*' on page 6 of this report. Four questions out of the 13 received notably higher response numbers (Questions 11, 14, 18 and 22).

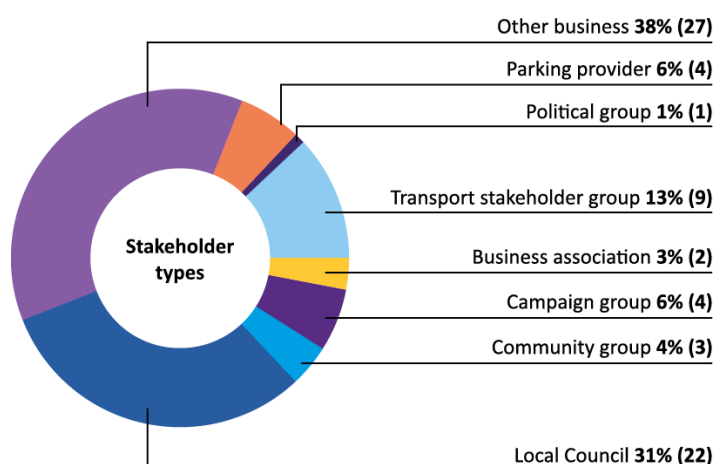
Responses received by open question asked

Question no.	Question text (summarised)	No. of responses
Q11	Impact a single penalty band will have on you?	1,350
Q12	Bigger or smaller difference between bands – additional comments	469
Q13	Penalty should change by a different amount – please specify	394
Q14	How would you be impacted if parking PCNs increased?	1,233
Q15	Concern about dangerous parking – additional comments	505
Q16	Have you noticed change in amount of dangerous parking – additional comments	317
Q17	Each fee should change by another amount – please specify	346
Q18	Impact on you if the additional parking fees increased?	1,074
Q20	Should PCNs for bus lane and moving traffic offences be set at same amount – no, please specify	423
Q21	Should PCNs for bus lane and moving traffic offences be set at Band A – no, please specify	495
Q22	Impact on you if the PCNs for bus lane and moving traffic offences increased?	1,143
Q24	How much do you think the discount rate should be?	837
Q26	How much do you think the surcharge increase should be changed to?	757

9) A total of 72 stakeholders responded to some of the open free text questions asked, including local councils, businesses, community groups and transport stakeholders.

10) A breakdown of stakeholder respondents by group is presented below:

Figure 1 Breakdown of Responses



Approach to the 13 ‘open’ free text question analysis:

- 1) All open free text question responses were read in full and analysed by a dedicated analysis team. A qualitative coding approach was taken to sort answers under each question by key themes and key points raised.
- 2) Coding works by assigning the points and themes raised by each respondent to one or more codes within a code frame.
- 3) Each of the thirteen questions were given its own code frame, or set of themes and points raised. This approach enables the same or very similar points raised (and expressed in a variety of ways) by multiple individuals to be categorised together. From this, it is possible to quantify how many times the same or similar points have been mentioned by respondents.
- 4) Each response has been coded to one or more codes, depending on the number of points raised by the respondent.
- 5) Code frames for the open free text questions have been developed with a three-tier structure, split into overarching themes, sub-themes, and then specific codes or points mentioned.
- 6) For example, a theme may be ‘*Opposition*’ (i.e. expression of negative sentiment to the proposal set out in a question), the sub-theme may be ‘*Opposition – Equality and Fairness*’ (i.e. specifying what topic the comment is in reference to), and the code may be ‘*Concern about impact on vulnerable groups*’ (i.e. the specific point made or implied by the respondent).
- 7) Some of the open questions are similar in their phrasing or the topic at hand. Consequently, some of the same or similar points have been raised by respondents across multiple questions. In order to ensure consistency, code and themes were phrased as similarly as possible where relevant across the questions, to enable easier cross-question comparison.
- 8) For each question, initial code frames were developed using a response sample set and reviewed by London Councils. For the four core questions, two versions of an initial code frame were iterated prior to ‘mass coding’ commencing on the remaining responses.

Summary of Responses by Questions Asked

Questions 1 to 10: General Background Information

Point to note:

At the start of the consultation, London Councils advised all respondents in advance of the following:

- a. That we needed to collect some information about them that will help us analyse the responses to this consultation.*
- b. Any personal information such as email addresses (if provided) will be kept confidential and safeguarded in line with the requirements of privacy and data protection legislation.*
- c. Some aggregated data may be made publicly available later in the form of a report, publishing the results.*
- d. This information will not be held by London Councils any longer than required and only for the purposes of this consultation and analysis.*

Question 1: How are you responding to this survey?

- See Table 1
- Respondents were asked to state if they were representing a business/organisation (i.e. a stakeholder) or in a personal capacity (i.e. as an individual)
- Of those who responded to this question, 1,914 respondents identified themselves as individuals and 120 as stakeholders
- All 2,034 respondents answered this question

Table 1: Type of consultation respondent

Answer Choices	Total
I am responding in a personal capacity	1,914
I am responding as an official representative of a business/organisation (e.g. a charity, lobbying group, London borough etc.)	120
Total responses	2,034

Question 2: If you would like to receive feedback on the consultation responses, please provide your email address.

- See Table 2
- 950 respondents have requested a copy of this report by providing their email addresses
- All 950 respondents were individuals
- 1,084 respondents skipped this question

Table 2: Feedback requested

Answer Choices	Total
Yes – email address provided	950
Skipped the question	1,084

Question 3: Please select the option that applies to you below:

- 1) I live in London
- 2) I live and work in London
- 3) I work in London
- 4) I am a visitor to London

- See Table 3
- Out of those respondents that told us that they ‘live’ in London, with 724 were individuals and 2 were stakeholders
- 932 respondents ‘live and work’ in London, of which 931 were individuals and 1 stakeholder
- 64 respondents told us that they ‘work’ in London. 63 were individuals and 1 stakeholder
- All 108 respondents that said that they were a ‘visitor’ to London, were individuals
- 204 respondents skipped this question

Table 3: Connection to London

Answer Choices	Total
I live in London	726
I live and work in London	932
I work in London	64
I am visitor to London	108
Total responses	1,830
Skipped this question	204

Question 4: Which London borough do you live in? (This is the name of the local authority that you pay your council tax to) Please select 'Unsure' if you don't know.

- See Table 4
- The consultation provided a full drop-down list of all 32 boroughs and the City of London, including an option to choose ‘Unsure’
- Respondents were asked to tell us which London borough they lived in, (if they had previously selected that they live in London or live and work in London) and a total of 1,641 respondents replied
- 1,632 respondents told us which borough they lived in but 9 respondents were unsure
- 393 respondents skipped this question

Table 4: Borough of Residence

Answer Choices	Total
Unsure	9
Barking and Dagenham	12
Barnet	114
Bexley	18
Brent	31
Bromley	69
Camden	22
City of London	3
Croydon	119
Ealing	48
Enfield	89
Greenwich	46
Hackney	74
Hammersmith and Fulham	19
Haringey	29
Harrow	52
Havering	253
Hillingdon	18
Hounslow	27
Islington	31
Kensington and Chelsea	26
Kingston upon Thames	25
Lambeth	37
Lewisham	85
Merton	80
Newham	39
Redbridge	74
Richmond upon Thames	18
Southwark	39
Sutton	14
Tower Hamlets	17
Waltham Forest	60
Wandsworth	32
Westminster	12
Total	1,641
Skipped the question	393

Question 5: Name of your business/organisation?

- See Table 5
- A total of 120 respondents identified themselves as a stakeholder
- 95 respondents provided the name of their business/organisation

- 25 respondents left this blank but for the purposes of this report they have been considered as stakeholders.
- Out of the 95 stakeholders listed below, some have provided obscure names of their business/organisation but for the purposes of this report they have been considered as stakeholders.

Table 5: Name of the business/organisation

	Name of Business/Organisation
1	A
2	Age UK
3	Be First
4	Best Food Logistics
5	Better Streets for Havering
6	Beyond sight loss
7	Bloom Roofing Ltd
8	Brewery Logistics Group
9	British Association of Removers
10	British Parking Association (BPA)
11	British Security Industry Association / SaferCash
12	BVRLA
13	BW Legal
14	Camden
15	Chandler8
16	Chase Evans Residential
17	City of London Corporation
18	City of Westminster Council
19	CPS Midlands Ltd
20	Crafty Wizards
21	Cumbria Parking Services Ltd
22	DS
23	Federation of Small Businesses (FSB)
24	Freedom for Drivers Foundation
25	GSW Air Conditioning LTD
26	GXS Services Ltd
27	Hackney Council
28	Hackney Living Streets
29	Haringey Council
30	J
31	James Hunt Signwriters
32	John Lewis Partnership
33	
34	KARR Technology
35	LB Bexley
36	LB Parking

37	Link Parking Ltd
38	Logistics UK
39	London Borough of Barking and Dagenham
40	London Borough of Barnet
41	London Borough of Barnet
42	London Borough of Brent
43	London Borough of Bromley
44	London Borough of Camden
45	London Borough of Ealing
46	London Borough of Hammersmith & Fulham
47	London Borough of Harrow
48	London Borough of Havering
49	London Borough of Havering
50	London Borough of Havering
51	London Borough of Islington
52	London Borough of Lambeth
53	London Borough of Lewisham
54	London Borough of Richmond
55	London Borough of Richmond
56	London Borough of Sutton
57	London Borough of Waltham Forest
58	London Borough of Waltham Forest
59	London Borough Of Waltham Forest
60	London Borough of Wandsworth
61	London Cab Drivers Club
62	London Cycling Campaign
63	M&D London Services Ltd
64	Merton Conservatives
65	Merton Conservatives
66	Mr. Parking Consultancy
67	National Parking Enforcement Ltd
68	Newham Muslim Forum
69	Pace Recovery & Storage Limited t/as Ace Security Services
70	Phoenix Healthcare Distribution
71	Redbridge Carers Support Service
72	Redbridge Council
73	Retainagroup Limited
74	Richmond AID
75	Royal Mail
76	SEBRA
77	Southwark Council
78	Southwark Living Streets
79	Srs.of the Holy Family of Nazareth
80	Stagecoach

81	STEEL
82	Sunbelt Rentals
83	T
84	Test
85	Test
86	Thames Water Utilities Ltd.
87	The Licensed Taxi Drivers Association
88	The Midi Music Company
89	United Cabbies Group
90	Voltyx limited
91	Wandsworth Bridge Road Association
92	Wandsworth Community Transport
93	Whitehaven Harbour Commissioners
94	Wibblers Brewery (Farms) Ltd
95	-

Question 6: Which of the following best describes the business/organisation that you are representing?

- See Table 6
- The consultation provided a drop-down list of various ‘stakeholder groups’ to choose from, including an option to choose ‘Other’
- Out of the 120 stakeholders, 96 told London Councils which of the following best describes their business/organisation.
- 24 selected ‘Other’, (*please see Table 6a for further information*).

Table 6: Type of Business/Organisation

Answer Choices	Total
Accessibility group	1
Charity	10
Emergency services and Healthcare	2
Freight industry	1
Large commercial enterprise (more than 100 employees)	1
Lobbying group	3
Logistics/ Delivery company	6
London local authority	38
Member of Parliament	0
Local authority outside of London	1
Residents association	2
Small/medium enterprise (less than 100 employees)	20
Transport and Road User group	11
Other	24
Total responses	120
Skipped the question	1,914

- See Table 6a
- Out 24 respondents that chose 'Other', 18 provided the additional details, a few have provided obscure descriptions of their business/organisation but for the purposes of this report they have been considered as 'Other'
- 6 respondents did not provide any additional information about the nature of their business/organisation

Table 6a: 'Other' Types of Business/Organisation

	'Other' Type of Business/Organisation
1	Also a voice and support for small businesses (0 - 250 employees)
2	██████████@johnlewis.co.uk
3	Brewery Logistics, pubs, bars, restaurants and clubs
4	Political group
5	Not For Profit Harbour Authority
6	Interested party
7	Trade Association
8	Large Food distribution company
9	Political party
10	-
11	Trade Association of Removers
12	Lobby group for pedestrians
13	Electrician
14	Better streets campaign
15	DaC
16	Car user
17	Trade association for Security Industry
18	Trade Organisation for London Taxi Drivers

**Question 7: If you don't live in London, what is the name of your local authority?
(This is the name of the authority that you pay your council tax to)**

- See Table 7
- 162 respondents identified themselves as living outside of London and gave the following responses
- In total, 92 local authorities outside of London were named
- 1,872 skipped this question

Table 7: Name of Local Authority outside of London

	Local Authority outside of London
1	Aberdeenshire
2	Angus
3	Babergh
4	Basildon Council
5	Birmingham

6	Bolton Council
7	Bournemouth, Christchurch and Poole Council
8	Braintree District Council
9	Brighton & Hove
10	Bristol
11	Broxbourne
12	Buckinghamshire Council
13	Bury MBC
14	Cambridge
15	Castlepoint
16	Central Bedfordshire
17	Cherwell District Council
18	Cheshire East
19	Chilterns DC
20	Colchester
21	Cornwall Council
22	Crawley Council
23	Dacorum
24	Dartford
25	Derby
26	Derbyshire Dales
27	Dorset
28	Dudley MBC
29	East Hertfordshire
30	East Suffolk County Council
31	Elmbridge
32	Epping
33	Epping Forest
34	Essex
35	Glasgow City Council
36	Gravesham
37	Great Yarmouth
38	Greater Manchester
39	Hampshire
40	Hertfordshire
41	Hertsmere
42	High Peak
43	Kent
44	Kings Lynn & West Norfolk Council
45	Lancashire
46	Liverpool City Council
47	Luton
48	Manchester
49	Merton

50	North Lanarkshire
51	North Lincolnshire
52	North Somerset Council
53	Northampton
54	Oldham Council
55	Oxfordshire
56	Reading Borough Council
57	Rochdale
58	Rochford Council
59	Rotherham
60	Runnymede
61	Salford City Council
62	Sefton Council
63	Sevenoaks
64	Sheffield
65	Slough Borough Council
66	Somerset Council
67	South Buckinghamshire
68	South Cambridgeshire
69	South Kesteven District Council
70	South Lanarkshire Council
71	South Oxfordshire
72	Southend
73	Stirling
74	Stockport Council
75	Surrey
76	Swale
77	Swansea
78	Tameside Council
79	Tamworth Borough Council
80	Tandridge
81	Tendring District
82	Thameside
83	Thurrock
84	Uttlesford
85	Warrington
86	Waverley
87	West Northamptonshire
88	West Northants Council
89	Wiltshire
90	Windsor and Maidenhead
91	Wirral MBC
92	Wrexham

Question 8: Please select all the modes of transport that you regularly use in London:

- See Table 8
- The consultation provided a drop-down list of various modes of transport to choose from, including 'Other' and respondents could select more than one from the options made available
- 1,871 respondents told London Councils which modes of transport they regularly use in London from the options listed
- 163 respondents skipped this question
- 84 respondents selected 'Other' as an option and were asked to provide further information, *(please refer to Table 8a for further information)*

Table 8: Modes of transport

Answer Choices	Total
Bicycle/-bike	452
Bus	1,137
Car	1,572
E-scooter	30
Lorry	28
Motorcycle	80
Overground	758
Train	1,000
Underground	1,226
Van	113
Walking	1,205
Other	84
Total responses	1,871
Skipped the question	163

- See Table 8a
- Respondents that selected 'Other', informed London Councils that they also use the following modes of transport in London
- A total of 22 other modes of transport were named

Table 8a: 'Other' modes of transport

	Answer Choices
1	Armoured Vehicles
2	Bike
3	Black Cab
4	Car Share
5	DLR
6	Electric Car
7	Ferry

8	Horse Riding
9	Licensed Taxi (NOT Uber)
10	Minibus
11	Mobility Scooter
12	Motor Home
13	Motorcycle
14	Running
15	Scooter
16	Thames Clipper -River Boat
17	Tram
18	Trike
19	Trucks & Micro Electric Vehicle
20	Uber
21	Wheelchair
22	Zip Car Hire

Question 9: How did you hear about this consultation?

- See Table 9
- The consultation provided a drop-down list of various channels of communication, including an option to choose 'Other'
- Respondents were asked to tell us how they heard about London Councils' consultation from the channels of communication options list and 1,871 responded
- 163 respondents skipped this question

Table 9: Channels of Communication

Answer Choices	Total
Word of mouth	453
Twitter	190
LinkedIn	27
London Councils website	393
Newsletter (please specify)	404
Other (please specify)	404
Total responses	1,871
Skipped the question	163

- Below shows a 'word cloud' of all the 'Newsletters' and 'Other' different channels of communications that the respondents mentioned in this consultation.

Harrow Council weekly update neighbour Tfl taxi private Neighbourhood latest Key Issues
 weekly BBC News Link Local Authority London Resident Association online Media
 Lewisham Council e-newsletter London Councils Newsletter
 Havering Council weekly Enfield Council community website Next door
 Evening Standard council newsletter London Borough Key Issues FB
 group MP Local IPC Tfl Community Nextdoor Nextdoor app
 London Councils news article newsletter
 bulletin email BBC Facebook app Havering
 via email Havering council Newspaper Redbridge site
 website WhatsApp news RBKC Palmers Green Community
 e mail work Local MP Havering Council newsletter weekly update
 Living Havering LB Havering Friend article Next door app consultations Via
 Hocrofts news letter WhatsApp group Barnet Neighbourhood group update Barnet First
 Enfield Council Newsletter Greenwich Council newsletter Enfield taxi private hire Lewisham

Questions 10 to 26: Seeking the opinions of Respondents

Points to note:

The next set of questions have been split into the following seven parts:

- Part 1 – Band A and Band B Parking Areas
- Part 2 – Differential Penalty Levels for Parking
- Part 3 – Possible Changes to the Parking Penalty Charges
- Part 4 – Possible Changes to the Additional Parking Fees
- Part 5 – Bus Lane and Moving Traffic Contraventions
- Part 6 – Discount Rate of 50%
- Part 7 – Charge Certificate Surcharge of 50%

At the start of each part, to seek the opinions of the respondents, London Councils presented some brief background information (in addition to Appendix 1: Background Information Supplied to Respondents).

Summary of the Parking Penalty Charges in London:

A contravention is when a motorist does not follow the parking, bus lane and moving traffic regulations.

Currently, there are two factors that will impact the penalty charge amount if you are found to be parked in contravention (please see table below).

Band A and Band B penalty charges depend on where in London you have parked in contravention.

Differential penalty charge levels, known as Higher level and Lower level, depend on the type of contravention.

Differential Penalty Levels	Higher Level	Lower Level
Band A	£130	£80
Band B	£110	£60

Part 1 - Band A and Band B Parking Areas

Since 2011, London has been divided into two charging bands:

Band A penalty charges are higher and are more commonly used in areas with greater parking pressures, such as central London and urban town centres.

Band B penalty charges are lower and are more commonly used in outer London areas, where there is less pressure on parking.

An increasing number of boroughs now issue Band A penalty charges because they found that Band B penalty charges were too low to prevent poor parking behaviour.

Current banding areas are shown in the map below:

Existing on-street penalty charge bands



Question 10: Do you think London should have a single penalty band instead of two bands?

- See Table 10
- The consultation provided respondents with 3 options to choose from
- A total of 1,772 responded to this question
- 763 respondents suggested that London should have a single band (Band A) and 784 said that London should continue to have two bands (Band A and Band B)
- 262 respondents skipped this question

Table 10: Single Band in London

Answer Choices	Total
Yes	763
No	784
I don't know	225
Total responses	1,772
Skipped the question	262

Question 11: What would be the impact on you if a single penalty band was introduced throughout London?

- See Table 11
- A total of 1,350 respondents provided London Councils with a detailed response about the impact a single band in London would have on them (see *Table 11a and 11b*)
- 684 respondents provided no additional information

Table 11: Impact responses

Answer Choices	Total
Total responses	1.350
Skipped the question	684

- See Table 11a
- A total of 1,350 respondents expressed their views on this
- The most common point raised was that they would not be impacted 222 by the introduction of a single band in London
- Followed by the support of 121 respondents for a single penalty band as it would improve clarity/reduce confusion around the penalty charge structure in London
- A further 115 respondents suggested that the greatest impact would be higher costs, while 98 respondents expressed concern about affordability given higher costs and 94 respondents shared their views saying that it was all about making money
- 93 expressed concern that changes to penalty bands would be a way for to generate more money.

Table 11a: All Themes raised by Individuals and Stakeholders to Question 11

Theme	Code	Number	% out of 1350
Neutral - No Impact	Not impacted by the increase in charge (general)	222	16%
Support - Equality and Fairness	Support improved clarity/reducing confusion	121	9%
Impact - Cost	Suggestion that main impact is an increased cost	115	9%
Opposition - Financial	Concern about affordability/impact of cost	98	7%
Opposition - Governance	Concern that initiative is a 'money making' scheme	94	7%
Neutral - No Impact	Not impacted due to compliance/only impact those who do not comply	93	7%
Support - Governance	Support for consistency across London	84	6%
Opposition - Equality and Fairness	Concern about unfairness punishing a mistake/ unavoidable situation	82	6%

Theme	Code	Number	% out of 1350
Support - Deterrent	Support acting as a greater deterrent and/or increased compliance	75	6%
Support - Deterrent	Support a reduction in dangerous parking	70	5%
Opposition - Equality and Fairness	Concern about disproportionate impacts outside of central London (where public transport is more limited)	70	5%
Opposition - Bands	Concern about single penalty band being at higher rate	70	5%
Opposition - Financial	Concern about impacts on cost of living and high inflation	64	5%
Support - Bands	Support for single penalty band at lower rate	57	4%
Support - Equality and Fairness	Support making penalty system fairer	52	4%
Opposition - General	Concern about impact on motorists (inc. anti-motorist sentiment)	45	3%
Opposition - Financial	Concern about the reduced levels of income from fines	35	3%
Opposition - Financial	Concern about impact on deprived communities	34	3%
Opposition - Bands	Impact depends on whether single penalty band is set higher or lower	33	2%
Neutral - No Impact	Not impacted due to already receiving higher charges	28	2%

- 63 respondents out of 1,350, identified themselves as stakeholders
- Their top points raised are presented in Table 11b
- 12 stakeholders supported a single band as would improve clarity and reduce confusion
- 11 stakeholders expressed that it would act as a deterrent and improve compliance in the whole of London, whilst 11 stakeholders said that they would feel no impact

Table 11b: Top 10 codes raised by Stakeholders to Question 11

Theme	Code	Number	% out of 63
Support – Equality and Fairness	Support improved clarity/reducing confusion	12	19%
Support – Deterrent	Support acting as a greater deterrent and/or increased compliance	11	17%
Neutral – No Impact	Not impacted by the increase in charge (general)	11	17%
Support – Governance	Support for consistency across London	10	16%

Theme	Code	Number	% out of 63
Support – Deterrent	Support a reduction in dangerous parking	4	6%
Opposition – Businesses	Concern about impacts on businesses	4	6%
Opposition – Bands	Concern about single penalty band being at higher rate	4	6%
Support – Bands	Support for a single penalty band at higher rate	3	5%
Suggestions – Charge structure	Suggestion that fines should focus on private vehicles instead of commercial drivers	3	5%
Support – Road Safety	Support improved road safety	2	3%

Part 2 – Differential Penalty Levels for Parking:

Differential penalty levels were introduced in 2007, based on the type of parking contravention that has occurred:

Higher level penalty charges apply to more serious contraventions where parking is not allowed, such as on yellow lines or where parking is only allowed for certain vehicle or permit types.

Lower level penalty charges apply to less serious contraventions where parking is allowed but the restrictions have not been followed, such as overstaying in a pay and display bay.

Currently, the difference between higher and lower penalty charge amounts are shown in the table below:

	Higher Level Penalty Charge (More Serious)	Lower Level Penalty Charge (Less Serious)	Difference between Higher and Lower Level Penalty Charges
Band A	£130	£80	£50
Band B	£110	£60	£50

Question 12: Do you think that there should be a bigger or smaller difference between the Higher level and Lower level penalty charge, or should they continue to stay the same (e.g. £50)?

- See Table 12
- The consultation gave respondents 3 options to choose from including an option to add additional open comments
- A total of 1,172 responses were received
- 763 respondents agreed that the difference should remain at £50 and 784 disagreed
- 469 respondents added additional comments (*see Tables 12a and 12b*)

- 292 skipped this question altogether

Table 12: Should the difference between Higher & Lower Penalty Charges remain at £50

Answer Choices	Total
Yes	763
No	784
I don't know	225
Total responses	1,772
Total additional open comments	469
Skipped the question	262

- See Table 12a
 - In total, 469 respondents provided additional open ended comments
 - The most common response of 51, was a general suggestion to lower fines across all levels, followed by 46 respondents, concerned that proposals to increase penalty charges are designed to raise revenue
 - 38 respondents shared that the value of penalty charges is too high and 35 said that their concern about impacts of further rises in the context of the cost of living crisis and high inflation.
 - However, 37 respondents felt that the charges should be in line with the severity of the offence
 - There is also concern that many penalty charges are issued for mistakes and non-deliberate actions, an opinion shared by 33 respondents
- In support, only 29 respondents suggested that there should be no difference between Higher and Lower level penalty charges and they should be set at the same level

Table 12a: All Themes raised by Individuals and Stakeholders to Question 12

Theme	Code	Number	% Out of 469
Suggestions – Charging	Suggestion to lower all fines	51	11%
Opposition – Financial	Concern that charges are ‘money making’ scheme	46	10%
Opposition – Charging	Concern that charges are too high (general)	38	8%
Suggestions – Charge Structure	Suggestion for charges to be in line with the severity of offence	37	8%
Opposition – Financial	Concern about impacts on cost of living and high inflation	35	7%
Opposition – Equality and Fairness	Concern users are penalised for non-deliberate mistakes	33	7%
Support – Charging	Support for no difference between higher and lower charges	29	6%

Theme	Code	Number	% Out of 469
General	Comments relating to quality of consultation (inc. leading, bias)	26	6%
Opposition – Equality and Fairness	Concern about impacts on motorists (inc. anti-motorist)	26	6%
Support – Charging	Support for difference to remain the same	24	5%
Lower Level	Suggestion to decrease lower level charges	24	5%
Support – Deterrent	Support for the charge to be high to act as a deterrent (amount unspecified)	20	4%
Suggestions – Charging	Suggestion to raise all fines	17	4%
Support – Charging	Support for increasing difference (no amount specified)	12	3%
Suggestions – Charging	Suggestion for all fines to be set at lower level (flat rate)	12	3%
Higher Level	Suggestion to increase higher level charges	12	3%
Support – Charging	Support for scrapping charges	11	2%
Higher Level	Suggestion to decrease higher level charges	11	2%
Suggestions – Charge Structure	Suggestion for charging cars that park obstructively	10	2%
Opposition – Deterrent	Concern that system does not act as a deterrent	8	2%

- 31 respondents identified themselves as stakeholders out of 469
- Their top points raised are presented in Table 12b

Table 12b: Top 10 codes raised by Stakeholders to Question 12

Theme	Code	Number	% out of 31
Support – Charging	Support for difference to remain the same	4	13%
Support – Charging	Support for no difference between higher and lower charges	4	13%
Support – Deterrent	Support for the charge to be high to act as a deterrent (amount unspecified)	4	13%
Suggestions – Charge Structure	Suggestion for charges to be in line with the severity of offence	3	10%

Theme	Code	Number	% out of 31
Support – Charging	Support for increasing difference (no amount specified)	2	6%
Suggestions – Charge Structure	Suggestion for charges for HGVs to be lower than cars	2	6%
Opposition – Deterrent	Concern that system does not act as a deterrent	2	6%
Support – Charging	Support for decreasing difference (no amount specified)	1	3%
Support – Charging	Support for scrapping charges	1	3%
Suggestions – Charging	Suggestion for higher charges for all (flat rate)	1	3%

Part 3 – Possible Changes to the Parking Penalty Charges

Since 2011, contraventions have gone up by 50% and we are concerned that the current penalty charges no longer act as a deterrent.

The increasing rate of inflation has also meant that there has been a reduction in the value of penalty charges over time.

In 2022, Transport for London increased parking penalty charges on their Red Routes from £130 to £160.

The table below shows the current penalty charges and possible options to increase them:

	Current Penalty Charge	Penalty Charge Option: in line with Inflation since 2010	Penalty Charge Option: equal to the Transport for London increase
Band A, Higher Level	£130	£180	£160
Band B, Higher Level	£110	£150	£130
Band A, Higher Level	£80	£120	£100
Band B, Lower Level	£60	£90	£70

Question 13: Thinking about the current penalty charges, to improve parking behaviours, these should:

- 1) All stay the same
- 2) All increase in line with the rate of inflation
- 3) All increase at the same rate as Transport for London (e.g. from £130 to £160)
- 4) Each penalty charge should change by another amount altogether (please specify)

- See Table 13
- A total of 1,639 responses were received and a majority of 743 indicated that they want the parking penalty charges to stay the same
- 369 respondents want to see these penalty charges change by different amounts
- A total of 394 respondents provided London Councils with additional comments (see *Tables 13a and 13b*)
- 395 skipped this question altogether

Table 13: Possible changes to the Parking penalty charges

Answer Choices	Total
All stay the same	743
All increase in line with the rate of inflation	257
All increase at the same rate as Transport for London (e.g. from £130 to £160)	243
Each penalty charge should change by another amount altogether (please specify)	369
Total responses	1,639
Total additional open comments	394
Skipped the question	395

- In total, 394 respondents provided an additional response
- The most common response was in support of keeping the charges but by reducing them instead, with 122 respondents indicating that they supported having penalty charges but at lower rates than the options consulted on but without suggesting any new pricing strategy
- 40 respondents were opposed to higher charges, expressing concern about the impacts of higher charges in the context of the cost of living crisis, with another 29 expressing concern that the charges are already too high
- When responding with specific amounts, 39 respondents were most likely to propose that charges for Higher and Lower penalty levels should be between £1 and £50

Table 13a: All Themes raised by Individuals and Stakeholders to Question 13

Theme	Code	Number	% out of 394
Support - Charging	In support of charges but should decrease instead (by no specified amount)	122	31%
Opposition – Financial	Concern about impacts on cost of living/lower incomes	40	10%
Specified Amount (Lower)	For all lower charges to be between £1-£50	39	10%
Specified Amount (Higher)	For all higher charges to be between £1-£50	38	10%
Opposition – Charges	Concern the charges are too high	29	7%
Opposition – Governance	Concern that charges are ‘money making’ scheme	27	7%

Theme	Code	Number	% out of 394
Specified Amount (Lower)	For lower Band B to be decreased (less than £60)	22	6%
Specified Amount (Lower)	For lower Band A to be decreased (less than £80)	21	5%
Support – Charging	Support for charges to remain the same	19	5%
Specified Amount (Lower)	For all lower charges to be between £50-£100	18	5%
Suggestions – Charge structure	Suggestion for charges to rise above levels of inflation	18	5%
Specified Amount (Higher)	For all higher charges to be between £50-£100	17	4%
Specified Amount (Higher)	For higher Band B to be decreased (less than £110)	17	4%
Specified Amount (Higher)	For higher Band A to be decreased (less than £130)	16	4%
Suggestions – Charge structure	Suggestion to link charges to income	15	4%
Support – Charging	Support for scrapping charges	13	3%
Opposition – Deterrent	Concern the charges aren't working as a deterrent	13	3%
Support – Deterrent	Support for the charge to be high to act as a deterrent (amount unspecified)	11	3%
Opposition – Equality and Fairness	Concern users are penalised for non-deliberate mistakes	11	3%
Support – Charging	Support for increasing charges (no amount specified)	10	3%

- *Figures 2.1 to 2.4* show the breakdown of responses which provided specific amounts for both Higher and Lower penalty charges, as well as a breakdown between Band A and Band B for each
- Percentages are calculated from the total number of respondents that provided specific amounts, rather than the total number of respondents to this question

Figure 2.1: Higher level should change by a different amount...

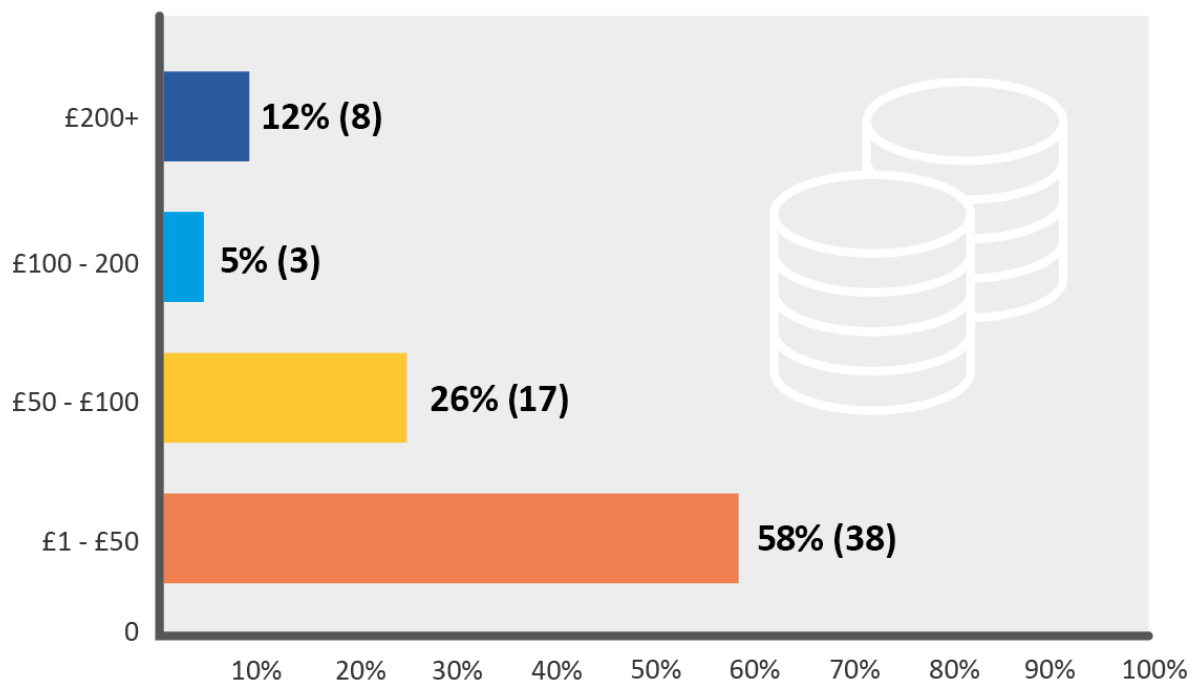


Figure 2.2: Higher level band split changes...

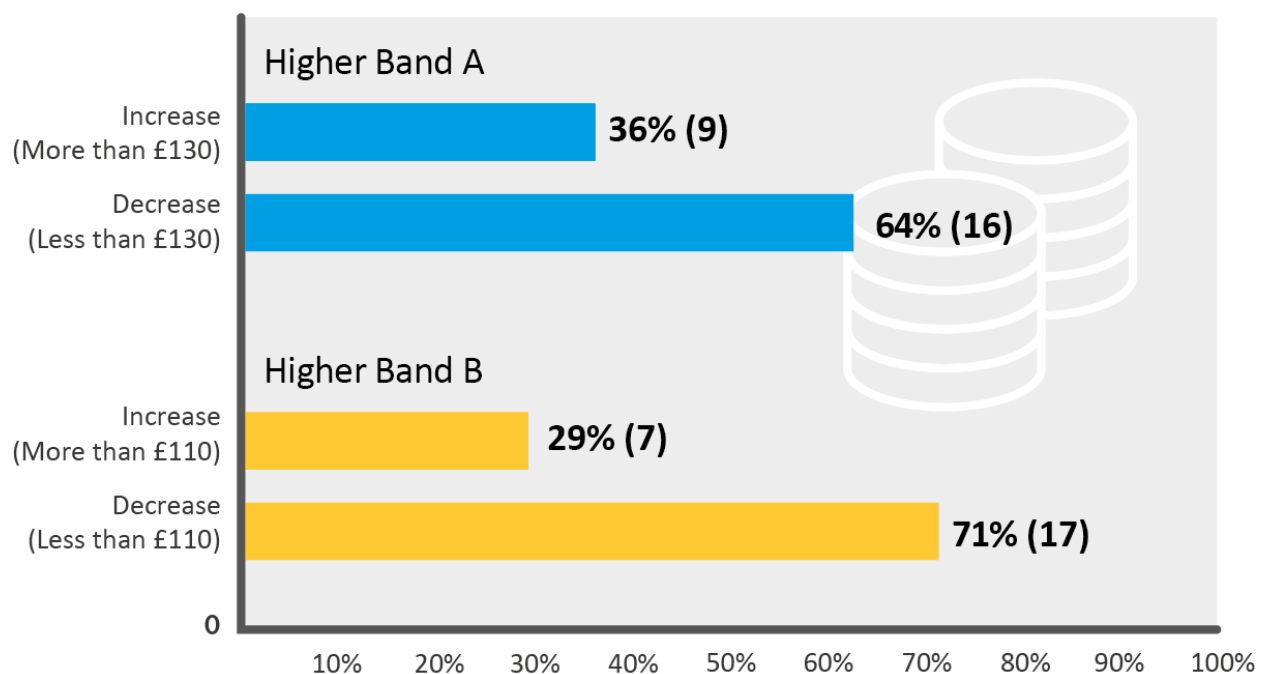


Figure 2.3: Lower level should change by a different amount...

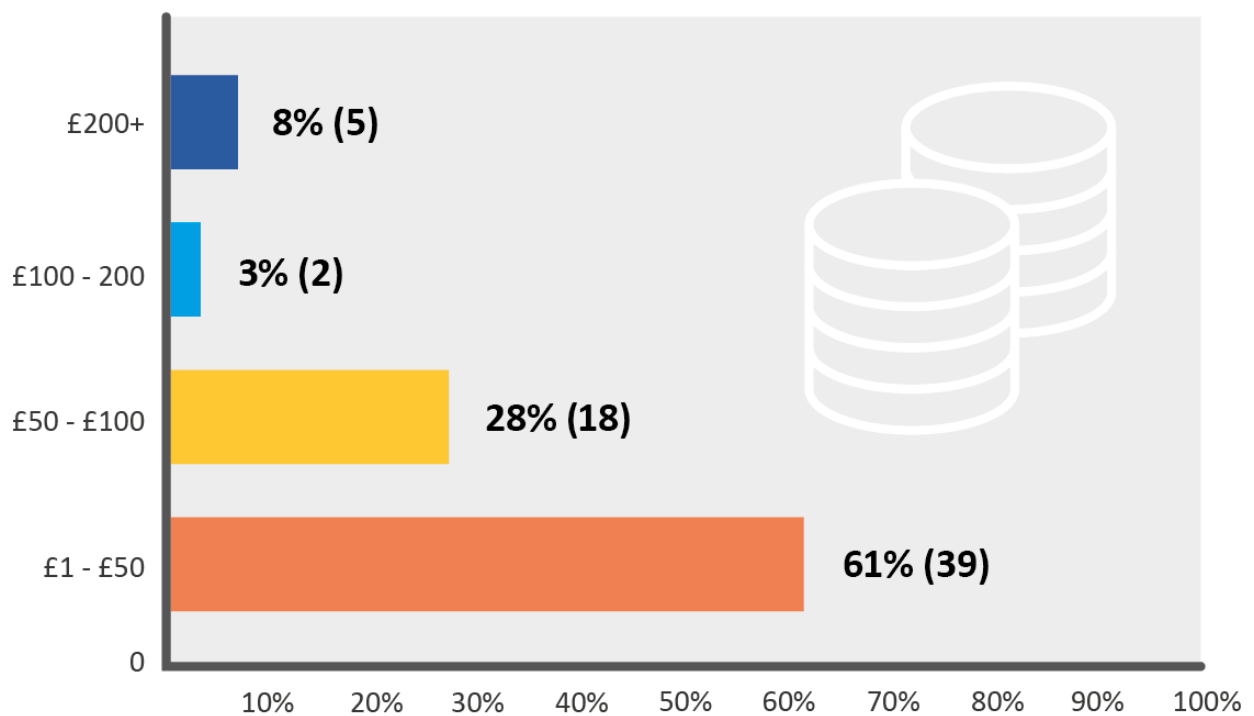
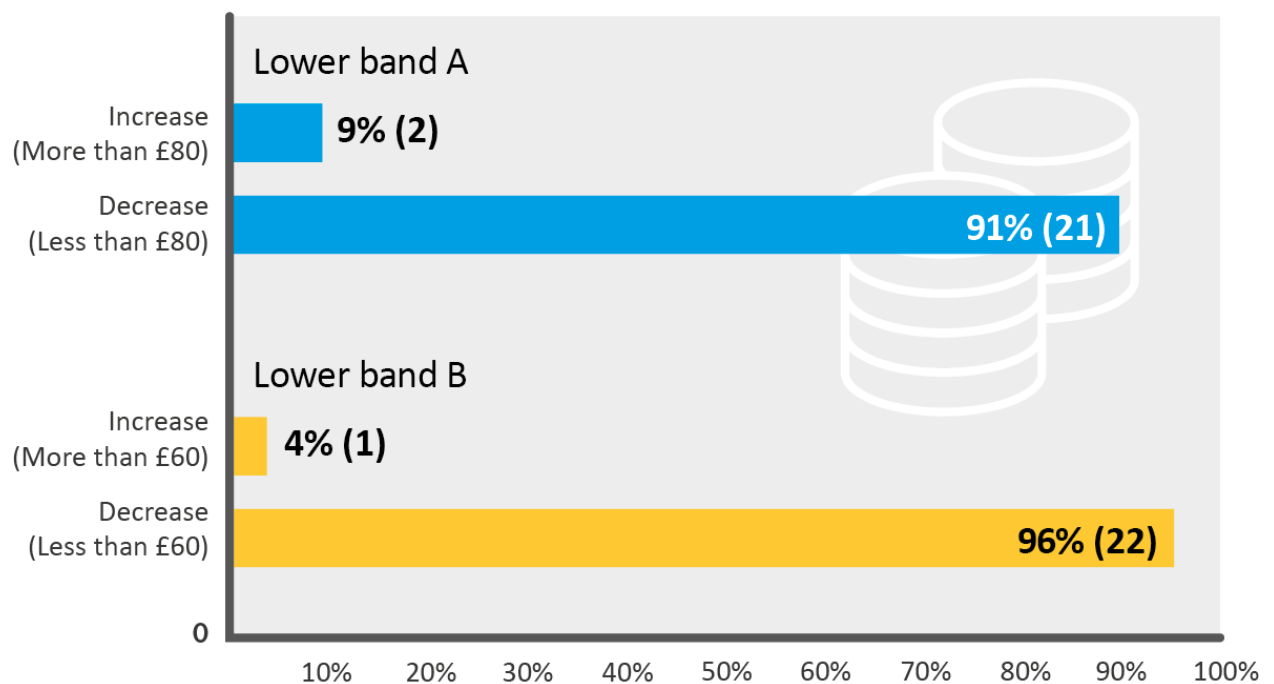


Figure 2.5: Lower level band split changes...



- Out of 394 respondents, 13 of them identified themselves as stakeholders
- Their top points raised are presented below in Table 13b

Table 13b: Top 10 codes raised by Stakeholders to Question 13

Theme	Code	Number	% out of 13
Support – Charging	In support of charges but should decrease instead (by no specified amount)	31%	4
Support – Deterrent	Other	15%	2
Suggestions – Charge structure	Suggestion for charges for HGVs to be lower than cars	15%	2
Opposition – Charges	Concern the charges are too high	15%	2
Support – Charging	Support for increasing charges (no amount specified)	8%	1
Support – Charging	Support for scrapping charges	8%	1
Support – Deterrent	Support for the charge to be high to act as a deterrent (amount unspecified)	8%	1
Suggestions – Charge structure	Suggestion for charges to rise above levels of inflation	8%	1
Opposition – Financial	Concern about impacts on cost of living/lower incomes	8%	1
Opposition – Financial	Other	8%	1

Question 14 – How would you be impacted if parking penalty charges were to increase?

- See Table 14
- A total of 1,233 respondents provided London Councils with further information about the impact of any increase in the penalty charges for parking would have on them
- 801 respondents chose not to answer this question

Table14: Impact responses

Answer Choices	Total
Total responses	1,233
Skipped the question	850

- See Table 14a
- The most common response was that 178 respondents would not be impacted by the proposed parking penalty charge increases and a further 104 respondents specified that they follow the rules and therefore would not receive a PCN

- However, 151 respondents expressed concern that charges would be unaffordable for them, with a further 144 expressing concern that now would be a bad time to raise charges given the cost of living crisis and high inflation
- 93 respondents were concerned that raising penalty charges would mean they would have less income for spending on other things
- In contrast, 104 expressed support for raising charges as it would increase the level of deterrence and compliance

Table 14a – All Themes raised by Individuals and Stakeholders to Question 14

Theme	Code	Number	% out of 1233
Neutral - No Impact	Not impacted by the increase in charge	178	14%
Opposition - Financial	Concern that charges will be unaffordable	151	12%
Opposition - Financial	Concern that this is a particularly bad time due to cost of living and high inflation	144	12%
Support - Deterrent	Support the PCN increase to act as more of a deterrent and/or increase compliance	104	8%
Neutral - No Impact	Not impacted as rules would be followed	101	8%
Opposition - Financial	Concern about the reduced levels of income from fines	93	8%
Opposition - Financial	Concern about increased costs	91	7%
Opposition - Equality and Fairness	Concern about unfairness punishing a mistake/ unavoidable situation	87	7%
Support - Deterrent	Support improvements to quality and availability of parking	62	5%
Opposition - Financial	Concern that initiative is a 'money making' scheme	53	4%
Support - Road Safety	Support improved road safety	48	4%
Support - Deterrent	Fewer obstructions on roads and pavements due to higher compliance	40	3%
Opposition - Road Infrastructure	Concern about lack of adequate marking/signage	36	3%
Support - Sustainability	Support modal shift to sustainable transport modes	35	3%
Type of change	Visit London/area less frequently	35	3%
Opposition - Charging	Concern charges are already high enough	30	2%

Theme	Code	Number	% out of 1233
Opposition - Charging	Against charge increases for parking	27	2%
Opposition - Equality and Fairness	Negative effect on mental health & more stressful environment	27	2%
Opposition - Equality and Fairness	Concern about impact on motorists (inc. anti-motorist sentiment)	26	2%
General	Negative Impact (general)	25	2%

- 55 out of 1,233 respondents identified themselves as stakeholders
- Their top points raised are presented below in Table 14b

Table 14b – Top 10 codes raised by Stakeholders to Question 14

Theme	Code	Number	% out of 55
Support - Deterrent	Support the PCN increase to act as more of a deterrent and/or increase compliance	17	31%
Support - Governance	Acknowledge the requirement for increased charges due to inflation and/or rising costs to support the running of current parking operations	7	13%
Opposition - Businesses	Concern about impacts on businesses	7	13%
Opposition - Financial	Concern that charges will be unaffordable	7	13%
Support - Road Safety	Support improved road safety	4	7%
Opposition - Equality and Fairness	Concern about unfairness punishing a mistake/ unavoidable situation	4	7%
Opposition - Businesses	Concern about increased costs to businesses being passed on to consumers/ residents	4	7%
Neutral - No Impact	Not impacted by the increase in charge	3	5%
Opposition - Financial	Concern about the reduced levels of income from fines	3	5%
Support - Governance	Supports increase to align with wider strategies	2	4%

Question 15 – Based on your experience, does the level of dangerous/inconsiderate parking in London concern you?

- A total 1,657 responded to this question, with 813 respondents agreeing that there is an issue with dangerous and inconsiderate parking problems that concern them in London
- 725 respondents however, thought the opposite
- 505 in total, provided London Councils with additional information on this, (see *Table 15a and 15b*)
- 409 respondents skipped this question

Table 15: Concerned about dangerous/inconsiderate parking in London?

Answer Choices	Total
Yes – I am concerned	813
No – I am not concerned	725
I don't know	87
Total responses	1,657
Total additional open comments	505
Skipped the question	409

- The most common concern highlighted to London Councils was about parking on pavements with 56 respondents agreeing with this, followed by concerns about the impacts of inconsiderate parking through lack of availability with 54 respondents commenting on this point
- General concern was expressed by a further 34 respondents and 45 said that they had limited experience in seeing dangerous or inconsiderate parking on the roads
- Suggestion for greater enforcement to help with this issue was proposed by 37 respondents
- A further 30 expressed no concern about dangerous or inconsiderate parking

Table 15a – All Themes raised by Individuals and Stakeholders to Question 15

Theme	Code	Number	% out of 505
Concern - Road Safety	Concern about parking on pavements	56	11%
Concern - Road Safety	Concern about impacts on parking availability	54	11%
Neutral - No Concern	Comment regarding limited experience in seeing dangerous parking	45	9%
Suggestions - Enforcement	Suggestion for greater enforcement	37	7%
Opposition - General	General concern about negative impacts	34	7%
Neutral - No Concern	No concern (general)	30	6%

Theme	Code	Number	% out of 505
Concern - Road Safety	Concern about dangerous/inconsiderate parking	28	6%
Opposition - Governance	Concern it is a 'money making scheme'	26	5%
Concern - Road Safety	Concern about dangerous parking over yellow lines	24	5%
Concern - Road Safety	Concern about parking in cycle lanes	22	4%
Suggestions - Charging	Suggestion for other methods (not charging) to be considered to improve parking quality	21	4%
Concern - Road Safety	Concern about inconsiderate driving rather than parking	17	3%
Neutral - No Concern	Other	16	3%
Concern - Road Safety	Concern about dangerous parking on corners	16	3%
Concern - Road Safety	Other	15	3%
Opposition - Traffic	Concern about increased congestion	15	3%
Concern - Road Safety	Concern about parking near schools	13	3%
Suggestions - Charging	Suggestion to only charge for uncompliant parking	12	2%
Suggestions - Charging	Suggestion that charges should stay the same	11	2%
Concern - Road Safety	Concern about the behaviour of delivery drivers	10	2%

- 21 out of 505 respondents identified themselves as stakeholders
- Their top points raised are presented below in Table 15b

Table 15b – Top 10 codes raised by Stakeholders to Question 15

Theme	Code	Number	% out of 21
Concern - Road Safety	Concern about dangerous/inconsiderate parking	6	29%
Support - Deterrent	Support acting as a deterrent and/or increased compliance	3	14%
Suggestions - Charging	Suggestion for other methods (not charging) to be considered to improve parking quality	3	14%

Theme	Code	Number	% out of 21
Neutral - No Concern	Comment regarding limited experience in seeing dangerous parking	2	10%
Opposition - Businesses	Concern about impacts on commercial drivers/operations (i.e. deliveries)	2	10%
Suggestions - Charging	Suggestion that charges should stay the same	2	10%
Support - Deterrent	Support the PCN increase to act as more of a deterrent and/or increase compliance	1	5%
Opposition - General	General concern about negative impacts	1	5%
Concern - Road Safety	Concern about parking on pavements	1	5%
Concern - Road Safety	Concern about parking in loading bays	1	5%

Question 16 – Have you noticed a change in the number of dangerous/inconsiderate parking behaviours in London?

- A total 1,625 responded to this question, with 646 respondents suggesting that they have noticed an issue with dangerous and inconsiderate parking behaviours
- 830 respondents thought the opposite and had not noticed any changes
- 317 in total provided London Councils with additional information on this (see *Tables 16a and 16b*)
- 409 respondents skipped this question

Table 16: Noticed a change in dangerous/inconsiderate parking behaviours?

Answer Choices	Total
I have noticed an increase	646
I have not noticed any change	830
I have noticed a decrease	149
Total responses	1,625
Total additional open comments	317
Skipped the question	409

- The most common response was confirming that the respondent felt there has been a general increase in the number incidences of dangerous or inconsiderate parking behaviours, with 45 respondents agreeing with this
- Only 13 said that they felt there had been no increase in dangerous or inconsiderate parking
- A further 20 respondents expressed concern regarding lack of parking enforcement, with another 18 expressing concern about the impact of new road layouts (such as where cycle lanes or road narrowing has been recently introduced) on dangerous parking

- 17 respondents were concerned that dangerous parking has increased due to the lack of parking availability and/or increase in parking demand

Table 16a – All Themes raised by Individuals and Stakeholders to Question 16

Theme	Code	Number	% out of 317
Increase - General	General increase in number of incidences (non-specific)	45	14%
Reasons for Increase - Enforcement	Concern regarding lack of enforcement	20	6%
Reasons for Increase - Road Network	Concern about the impact of new road layouts (e.g. cycle lanes, road narrowing etc)	18	6%
General	Concern that scheme is a 'money making' scheme	17	5%
Reasons for Increase - Parking	Concern over the lack of parking availability/ increase demand	17	5%
Concern - Road Safety	Concern about the behaviour of delivery drivers	14	4%
Neutral - General	No change in dangerous/inconsiderate parking noticed	13	4%
Increase- Road Safety	Increase in amount of parking on double yellow lines & zig zags	12	4%
Concern - Road Safety	Concern about parking near schools	10	3%
Increase- Road Safety	Increase in the amount of pavement parking	9	3%
Concern - Road Safety	Concern about parking on pavements	9	3%
Suggestions - Enforcement	Suggestions for more enforcement	9	3%
Suggestions - Charging	Other methods (not charging) should be considered to improve parking quality	9	3%
Decrease - General	General decrease in number of incidences	8	3%
Increase - Location	Increase in certain locations	7	2%
Neutral - General	Other	7	2%
Concern - Road Safety	Concern about parking on corners	7	2%
Concern - Road Safety	Concern about inconsiderate driving rather than parking	7	2%

Theme	Code	Number	% out of 317
Reasons for Increase - Charging	Support to lower the charge/ penalty for parking illegally	6	2%
Opposition - General	General concern about negative impacts	6	2%

- 25 out of 317 respondents identified themselves as stakeholders
- Their top points raised are presented below in Table 16b

Table 16b – Top 10 codes raised by Stakeholders to Question 16

Theme	Code	Number	% out of 25
Increase - General	General increase in number of incidences (non-specific)	5	20%
Neutral - General	Other	3	12%
Reasons for Increase - Parking	Concern over the lack of parking availability/ increase demand	2	8%
Concern - Road Safety	Concern about the behaviour of delivery drivers	2	8%
General	Concern that scheme is a 'money making' scheme	1	4%
Increase - General	Other	1	4%
Increase- Road Safety	Increase in the amount of pavement parking	1	4%
Neutral - General	No change in dangerous/inconsiderate parking noticed	1	4%
Reasons for Increase - Charging	Support to lower the charge/ penalty for parking illegally	1	4%
Reasons for Increase - Charging	Concern regarding confusion over the parking restrictions	1	4%

Part 4 – Possible Changes to the Additional Parking Fees

London boroughs can take additional enforcement action to clamp or remove a vehicle parked in contravention.

Clamping is very uncommon and removals are only carried out if the borough has access to a vehicle pound – these actions have additional fees as well as a penalty charge.

These fees also apply to vehicles identified and removed as ‘abandoned’ under environmental legislation.

The vehicle clamping, removal, storage, and disposal fees have not increased since 2007.

The table below shows the current additional parking fees and the possible option to increase them:

	Current Fee	Possible Fee Option: In line with Inflation since 2010
Clamping Fee	£70	£110
Removal Fee	£200	£315
Storage Fee (per day)	£40	£65
Disposal Fee	£70	£110

Question 17 – Looking at possible changes to the Additional Parking Fees, do you think that these fees should:

1) All stay the same

2) All increase in line with the rate of inflation

4) Each fee should change by another amount altogether (please specify)

- See Table 17
- A total of 761 respondents believe that the additional parking fees should all stay the same
- 491 respondents think they should increase in line with the rate of inflation
- 349 respondents think that each fee should be set at different amounts to the proposed amount and 346 respondents informed London Councils what the different amounts should be as shown in *Figures 3.1 to 3.4*
- 433 respondents skipped this question

Table 17: Additional parking fees should:

Answer Choices	Total
All stay the same	761
All increase in line with the rate of inflation	491
Each fee should change by another amount altogether (please specify)	349
Total responses	1,601
Total additional open comments	346
Skipped the question	433

- See Tables 17a and 17b
- The most common response supported the need to have additional parking fees in place but did not support any increase to these and suggested that they should be decreased instead, however the 96 respondents did not suggest any specific amounts
- 27 respondents expressed concern that the fees are already too high, with a further 23 expressing concern about raising fees in the context of the cost of living crisis
- Across all four specific types of fees, respondents were most likely to suggest a new amount of between £1 and £50, with 37 respondents selecting this for storage fees, 30 for both clamping and disposal fees and 17 for removal fees.

Table 17a – All Themes raised by Individuals and Stakeholders to Question 17

Theme	Code	Number	% out of 346
Support - Charging	In support of the additional parking fees but suggested a decrease instead (by no specified amount)	96	28%
Storage Fee	For all storage fees to be between £1-£50	37	11%
Clamping Fee	For all clamping fees to be between £1-£50	30	9%
Disposal Fee	For all disposal fees to be between £1-£50	30	9%
Opposition - Charging	Concern the fees are too high	27	8%
Opposition - Financial	Concern about impacts on cost of living/lower incomes	23	7%
Clamping Fee	Support for stopping the process of clamping	17	5%
Removal Fee	For all removal fees to be between £1-£50	17	5%
Suggestions - Charge structure	Suggestion for fees to rise above levels of inflation	17	5%
Support - Charging	Support for increasing the fees (no amount specified)	14	4%
Other	Comment out of scope	12	3%
Clamping Fee	For all clamping fees to be between £51-£100	12	3%
Suggestions - Charge structure	Other	12	3%
Removal Fee	For all removal fees to be between £51-£100	11	3%
Disposal Fee	For all disposal fees to be between £51-£100	11	3%

Theme	Code	Number	% out of 346
Opposition - Equality and Fairness	Concern that fees are 'money making' scheme	11	3%
Opposition - Equality and Fairness	Concern about impacts on motorists (inc. anti-motorist)	11	3%
Support - Charging	Support for fees to remain the same	10	3%
Support - Charging	Support for no fees	8	2%
Specified Amount (All)	For all fees to double	8	2%

- Figures 3.1 to 3.4 show a breakdown of responses which provided specific amounts for
 - Storage fees
 - Clamping fees
 - Disposal fees
 - Removal fees
- Percentages are calculated from the total number of respondents that provided specific amounts, rather than the total number of respondents to this question

Figure 3.1: Storage fees should change by a different amount...

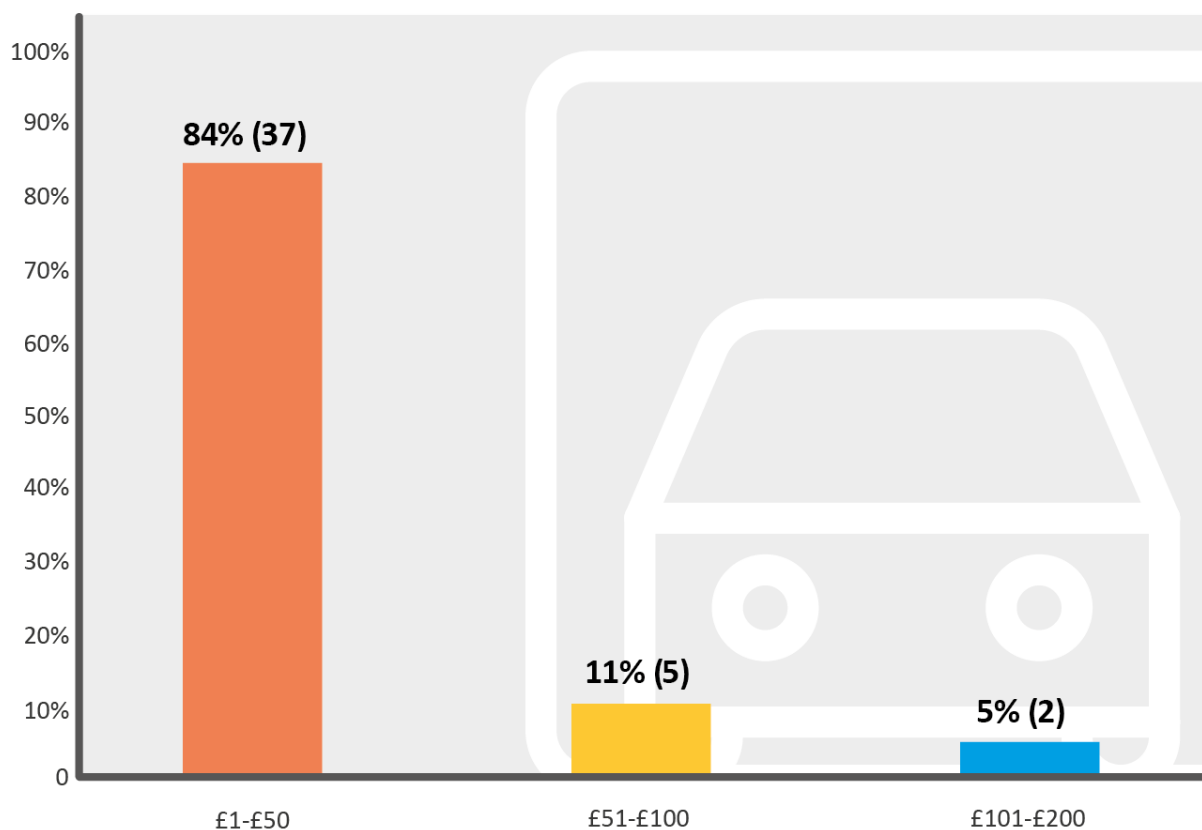


Figure 3.2: Clamping fees should change by a different amount...

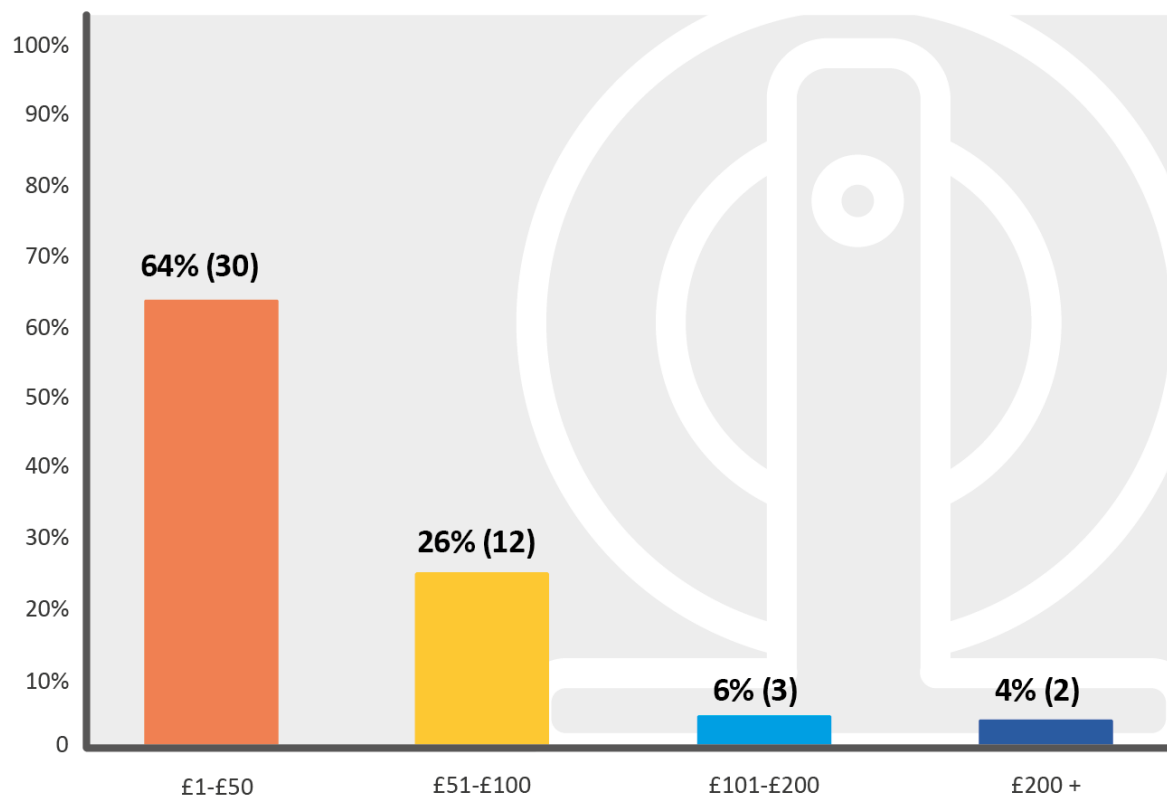


Figure 3.3: Disposal fees should change by a different amount...

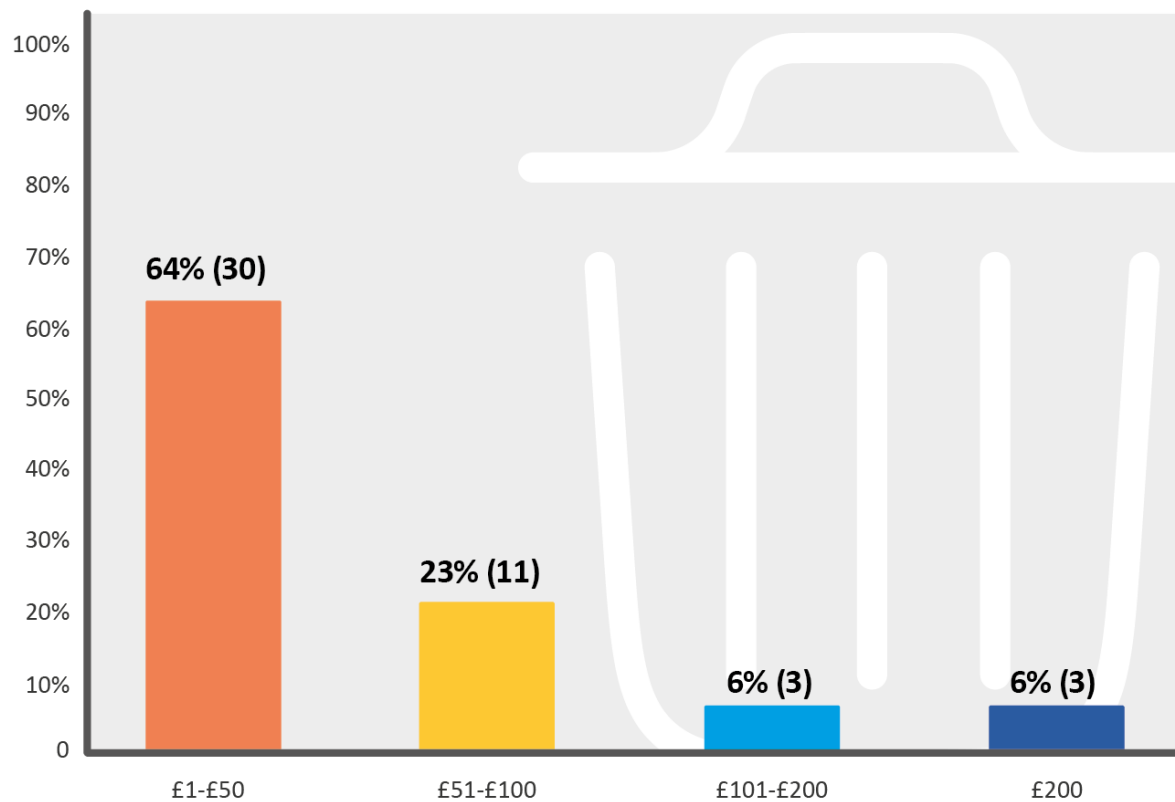
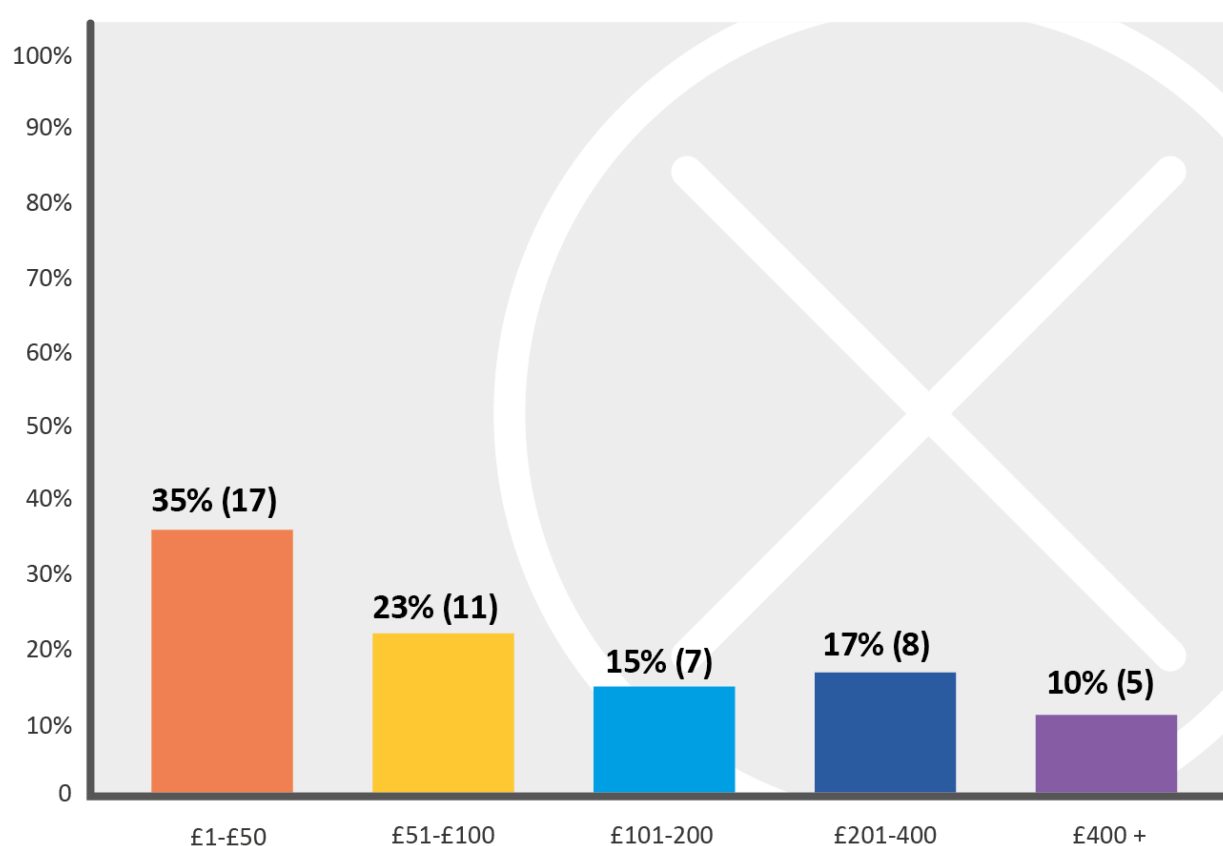


Figure 3.4: Removal fees should change by a different amount...



- 15 out 346 respondents identified themselves as stakeholders
- Their top points raised are presented below in Table 17b

Table 17b: Top 10 codes raised by Stakeholders to Question 17

Theme	Code	Number	% out of 15
Opposition - Charging	In support of the additional parking fees but opposed any increase, suggesting a decrease instead (by no specified amount)	13%	2
Support - Charging	Support for fees to remain the same	13%	2
Clamping Fee	For all clamping fees to be between £101-£200	13%	2
Suggestions - Charge structure	Suggestion for fees to be priced to cover cost of admin/ enforcement	13%	2
Support - Charging	Support for increasing the fees (no amount specified)	7%	1
Support - Deterrent	Support for the fees to be high to act as a deterrent (amount unspecified)	7%	1
Clamping Fee	Support for decreasing the fee (no amount specified)	7%	1

Theme	Code	Number	% out of 15
Clamping Fee	For all clamping fees to be between £1-£50	7%	1
Removal Fee	Support for fee to remain the same	7%	1
Removal Fee	For all removal fees to be between £51-£100	7%	1

Question 18 – What would be the impact on you if the above fees were to increase?

- See Table 18
- A total of 1,074 respondents informed London Councils of the impact that any increases in the additional parking fees for clamping, removal, storage and disposal of vehicles would have on them (see *Tables 18a and 18b*)
- 960 respondents did not provide any further information.

Table 18: Impact responses

Answer Choices	Total
Total responses	1,074
Skipped the question	960

- The most common response was that the respondent would not be impacted by an increase in these fees, with 247 respondents reporting this
- Followed by a further 104 who said they would not be impacted because they usually comply with the rules
- 155 respondents expressed concern that an increase in fees would be unaffordable, with a further 99 concerned about an increase in the context of the cost of living crisis
- In contrast, 71 respondents showed support for higher fees as they would improve the level of deterrence and compliance
- A further 60 respondents expressed support for increasing fees as they felt it would reduce illegal or dangerous parking on the streets

Table 18a – All Themes raised by Individuals and Stakeholders) to Question 18

Theme	Code	Number	% out of 1074
Neutral – No Impact	Not impacted by the increase in charge (general)	247	24%
Concern – Financial	Concern about affordability/impact of cost	155	15%
Neutral – No Impact	Not impacted due to compliance/only impact those who do not comply	104	10%
Concern – Financial	Concern about impacts on cost of living and high inflation	99	9%

Theme	Code	Number	% out of 1074
Support – Deterrent	Support acting as a greater deterrent and/or increased compliance	71	7%
Support – Deterrent	Support a reduction in illegal/dangerous parking	60	6%
Concern – Financial	Concern that initiative is a ‘money making’ scheme	48	5%
Opposition – Equality and Fairness	Concern about unfairly punishing a mistake/ unavoidable situation	32	3%
Concern – Financial	Suggestion that main impact is an increased cost	32	3%
General	General opposition to increased fees	29	3%
Support – Road Safety	Support improved road safety	23	2%
Opposition – Equality and Fairness	Concern about reduced quality of life	23	2%
Concern – Financial	Concern that fees are already too high	20	2%
Opposition – Traffic Impact	Concern about discouraging people from driving to/visiting London	19	2%
Opposition – Equality and Fairness	Concern about impact on vulnerable groups (i.e. elderly, disabled)	19	2%
Support – Governance	Support for recovering costs to councils to manage services	17	2%
Opposition – Equality and Fairness	Impact of discouraging people avoiding driving in the areas affected	17	2%
Support – Sustainability	Support for positive impacts on sustainable modes	16	2%
Opposition – Equality and Fairness	Concern about having to recover vehicle	16	2%
Opposition – Equality and Fairness	Concern that raising fees is unfair	13	1%

- 54 respondents identified themselves as stakeholders
- Their top points raised are presented in Table 18b

Table 18b – Top 10 codes raised by Stakeholders to Question 18

Theme	Code	Number	% out of 54
Support - Deterrent	Support acting as a greater deterrent and/or increased compliance	22%	12
Support - Governance	Support for recovering costs to councils to manage services	19%	10
Neutral - No Impact	Not impacted by the increase in charge (general)	17%	9
Support - Deterrent	Support a reduction in illegal/dangerous parking	9%	5
Opposition - Businesses	Concern about impacts on businesses	7%	4
Concern - Financial	Concern about costs being passed on to businesses/residents	7%	4
Support - Road Safety	Support improved road safety	6%	3
Concern - Financial	Concern about affordability/impact of cost	6%	3
Support - Governance	Support improved administration/enforcement of fees	4%	2
Opposition - Equality and Fairness	Concern about impacts on motorists (general)	4%	2

Part 5 – Bus Lane and Moving Traffic Contraventions

Bus lane contraventions occur when a vehicle enters a bus lane when not allowed.

Moving traffic contraventions include stopping in a yellow box junction when not allowed or performing a banned turn.

In 2022, Transport for London increased bus lane and moving traffic penalty charges on their Red Routes from £130 to £160.

Question 19: Are you concerned about the level of non-compliance of bus lane and moving traffic regulations in London?

- See Table 19
- A total of 1,554 respondents answered this question, with 551 agreeing that they were concerned about non-compliance of bus lane and moving traffic regulations
- Whilst a majority of respondents of 918 disagreed
- 85 respondents were unsure and therefore did not specify
- 480 respondents skipped the question altogether

Table 19: Concerned about the level of non-compliance of bus lane and moving traffic contraventions in London?

Answer Choices	Total
Yes – I am concerned	551
No – I am not concerned	918
I don't know	85
Total responses	1,554
Skipped the question	480

Question 20 – Should the penalty charges for bus lane and moving traffic contraventions on borough roads continue to be set at the same amount as each other (currently, both set at £130)?

- 1) Yes- they should be set at the same amount as each other
 - 2) I don't know
 - 3) No – they should be set at different amounts (please specify)
- See Table 20
 - A total of 1,554 respondents took part in this question, with 889 respondents saying that bus lane and moving traffic contravention penalty charges should continue to be set at the same amount as each other
 - 236 respondents were unsure about this question
 - 429 respondents said that bus lane and moving traffic contravention penalty charges should be set at different amounts to each other, and 423 of these respondents provided additional comments to what the amounts should be (*see Tables 20a and 20b*)
 - 480 respondents skipped this question

Table 20: Should bus lane and moving traffic penalty charges be the same amount?

Answer Choices	Total
Yes - they should be set at the same amount as each other	889
I don't know	236
No - they should be set at different amounts (please specify)	429
Total responses	1,554
Total additional open comments	423
Skipped the question	480

- The most common response supported the need to have bus lane and moving traffic penalty charges but felt that they should be set at lower amounts than the current amount, with 95 respondents suggesting this
- 47 respondents said that they were concerned that they could be penalised for accidents and non-deliberate acts
- Only 16 respondents suggested that charges remain the same, whilst 12 respondents suggested that there should be no charges at all
- 31 respondents showed support for an increase in bus lane penalty charges, while only 12 respondents expressed support for an increase to all penalty charges
- For those who specified a new penalty charge amount, 40 respondents chose the £1 - £50 bracket over any other

Table 20a – All Themes raised by Individuals and Stakeholders to Question 20

Theme	Code	Number	% out of 423
Support - Charging	Support to lower all charges	95	22%
Opposition - Equality and Fairness	Concern users are penalised for accidents and mistakes	47	11%
Specified Amount for All	From £1 to £50	40	9%
Specified Amount for All	From £51 up to £100	35	8%
Support - Charging	General support for increase to bus lane penalty charges (unspecified amount)	31	7%
Suggestions - Charge structure	Suggestion for charges to differ for different contraventions	25	6%
Support - Charging	Support for charges to remain the same	16	4%
Opposition - Charging	Suggestion that there should be no charges at all	12	3%
Support - Charging	General support for an increase to all charges	12	3%

Theme	Code	Number	% out of 423
Opposition - Equality and Fairness	Concern accidental contraventions happen due to unclear bus lane markings	12	3%
Opposition - Equality and Fairness	Concern accidental contraventions happen because yellow box rules are unclear	12	3%
Opposition - Charging	Concern the charges are too high	10	2%
Specified Amount for All	More than £200	9	2%
Suggestions - Charge structure	Charges for moving traffic and bus lane contraventions should be the same value	9	2%
Suggestions - Charge structure	Suggestion to increase charges for repeat offenders	9	2%
Suggestions - Charge structure	Suggestion for charges to be in line with the severity of offence	9	2%
Specified Amount for All	From £101 up to £200	8	2%
Opposition - Equality and Fairness	Concern it is an anti-motorist initiative	8	2%
Specified Amount for All	£0	7	2%
Opposition - Equality and Fairness	Other	7	2%

- Out of 423 respondents, 12 identified themselves as stakeholders
- Their top points raised are presented below in Table 20b

Table 20b – Top 10 codes raised by Stakeholders to Question 20

Theme	Code	Number	% out of 12
Support - Charging	General support for increase to bus lane penalty charges (unspecified amount)	25%	3
Opposition - Equality and Fairness	Concern users are penalised for accidents and mistakes (not deliberate)	25%	3
Support - Charging	Support for no charges at all	17%	2
Support - Charging	General support for an increase to all charges	17%	2

Theme	Code	Number	% out of 12
Support - Charging	Support to lower all charges	8%	1
Specified Amount for All	From £1 to £50	8%	1
Opposition - Equality and Fairness	Concern accidental contraventions happen due to unclear road markings / signs	8%	1
Suggestions - Charge structure	Charges for moving traffic and bus lane contraventions should be the same value	8%	1
Suggestions - Charge structure	Suggestion for charges to differ for different contraventions	8%	1
Suggestions - Charge structure	Suggestion to increase charges for intentional offences	8%	1

Question 21 – Do you think that the penalty charges for bus lane and moving traffic contraventions should be the same amount as Band A, Higher level parking penalties (currently, all set at £130)?

- See Table 21
- A total of 1,554 respondents took part in this question, with a majority of 720 indicating that Band A (Higher) parking, bus lane and moving traffic penalty charges should all be set at the same amount
- 309 respondents did not know and 525 respondents did not agree to the penalty charges all being the same amount
- 495 respondents provided additional comments regarding alternative suggestions (see *Tables 21a and 21b*)
- 480 respondents skipped this question

Table 21: Should Band A (Higher) parking, bus lane and moving traffic penalty charges be the same as each other?

Answer Choices	Total
Yes - they should all be set at the same amount	720
I don't know	309
No - they should all be set at different amounts (please specify)	525
Total responses	1,554
Total additional open comments	495
Skipped the question	480

- The most common response was in support for penalty charges but at a discounted rate with 138 respondents in agreement to this
- In contrast, 28 were in support of increasing charges, 24 were in support of charges remaining the same, and 13 respondents suggested that there should no charges at all
- For those who specified a new charge amount, more people, with 51 suggesting a value between £1 and £50, compared to any other price bracket
- 38 respondents also expressed concern that they are most likely to be penalised for accidents and non-deliberate acts

Table 21a – All Themes raised by Individuals and Stakeholders to Question 21

Theme	Code	Number	% out of 495
Support – Charging, but at lower levels	Support to lower all charges, but at lower levels.	138	28%
Specified Amount (All)	Up to £50	51	10%
Specified Amount (All)	From £51 up to £100	44	9%
Opposition – Equality and Fairness	Concern about unfairness punishing a mistake/unavoidable situation	38	8%
Support – Charging	Support for increased charges	28	6%
Support – Charging	Support for charges to remain the same	24	5%
Suggestions – Charge Structure	Suggestion for charges to be in line with the severity of offence	21	4%
Support – Charging	Support for increased charge on bus lanes (no amount specified)	20	4%
Support – Charging	Support for pricing to be at Band B	19	4%
General	Stakeholder Response	17	3%
Opposition – Equality and Fairness	Concern accidental contraventions happen due to unclear road markings/signs	17	3%
Specified Amount (All)	From £101 up to £200	16	3%
Opposition – Financial	Concern charges are high enough already	16	3%
Support – Charging	Support for lower charges on bus lanes and moving contraventions	14	3%
Opposition – Charging	Suggestion that there should be no charges at all	13	3%

Theme	Code	Number	% out of 495
Opposition – Governance	Concern it is a ‘money making’ scheme	11	2%
Specified Amount (All)	More than £200	10	2%
Opposition – Financial	Concern about impacts on cost of living and high inflation	10	2%
Suggestions – Charge Structure	Suggestion to increase charges for intentional offences	10	2%
Support – Charging	Support for higher charges on moving contraventions	9	2%

- Out of 495 of those who responded, 17 respondents identified themselves as stakeholders
- Their top points raised are presented below in Table 21b

Table 21b: Top 10 codes raised by Stakeholders to Question 21

Theme	Code	Number	% out of 17
Support - Charging	Support for increased charges	24%	4
Support - Charging	Support to lower all charges	12%	2
Specified Amount (All)	From £51 up to £100	12%	2
Suggestions - Charge Structure	Suggestion to increase charges for repeat offenders	12%	2
Support - Charging	Support for increased charge on bus lanes (no amount specified)	6%	1
Support - Charging	Support for charges to remain the same	6%	1
Support - Charging	Support for pricing to be at Band B	6%	1
Opposition - Equality and Fairness	Concern about unfairness punishing a mistake/ unavoidable situation	6%	1
Opposition - Equality and Fairness	Concern accidental contraventions happen due to unclear road markings / signs	6%	1
Opposition - Equality and Fairness	Concern motorists are unfairly targeted	6%	1

Question 22 – What would be the impact on you if the penalty charges for bus lane and moving traffic contraventions were to increase?

- See Table 22
- A total of 1,143 respondents told London Councils what impact any increase on bus lane and moving traffic penalty charges would have on them
- 891 respondents did not give us any additional information.

Table 22: Impact responses

Answer Choices	Total
Total responses	1,143
Skipped the question	891

- In total, 1,143 respondents provided a response this question (see *Tables 22a and 22b*)
- The most common response was that 212 respondents would not be impacted by an increase in bus lane and moving vehicle contravention penalty charges
- A further 90 respondents suggested that they would not be impacted because they comply with the rules
- However, 172 were concerned that an increase in the penalty charges would be unaffordable, with a further 59 comments made about concerns about cost of living crisis and high inflation
- 115 respondents were also concerned that they were most likely to receive a penalty for accidents and non-deliberate acts
- Those who expressed support for an increase, 114 suggested that higher fees would help to improve journey times, 85 would improve the level of deterrence and compliance, and 58 saying it would improve road safety for pedestrians and cyclists.

Table 22a: All Themes raised by Individuals and Stakeholders to Question 22

Theme	Code	Number	% out of 1143
Neutral - No Impact	Not impacted by the increase in charge (general)	212	19%
Opposition - Financial	Concern about affordability/impact of cost	172	15%
Opposition - Equality and Fairness	Concern about unfairly punishing a mistake/ unavoidable situation	115	10%
Support - Journey Times	Support given potential improvement to journey times	114	10%
Neutral - No Impact	Not impacted due to compliance/only impact those who do not comply	90	8%
Support - Deterrent	Support acting as a greater deterrent and/or increased compliance	85	7%
Opposition - Financial	Concern about impacts on cost of living and high inflation	59	5%

Theme	Code	Number	% out of 1143
Support - Road Safety	Support improved road safety for cyclists/ pedestrians	58	5%
Opposition - Governance	Concern it is a 'money making' scheme	56	5%
Opposition - Financial	Concern about the reduced levels of income from fines	48	4%
Opposition - General	General concern about negative impacts	42	4%
Support - Traffic	Support improved congestion levels for drivers	36	3%
Opposition - Road Infrastructure	Concern about lack of adequate marking/signage	36	3%
Opposition - Equality and Fairness	Concern motorists are unfairly targeted	32	3%
Opposition - Equality and Fairness	Concern about increased stress/ anxiety over the risk of incurring fines	30	3%
Support - Deterrent	Support a reduction in dangerous driving	28	2%
Opposition - Traffic Impact	Concern charges will discourage people from driving to/visiting London/ living in London	24	2%
Opposition - Equality and Fairness	Concern about reduced quality of life	22	2%
Opposition - Governance	General opposition about governance from local councils/ London	21	2%
Opposition - Financial	Concern the current penalty is high enough	19	2%

- 57 respondents identified themselves as stakeholders
- Their top points raised are presented in Table 22b

Table 22b – Top 10 codes raised by Stakeholders to Question 22

Theme	Code	Number	% out of 57
Support - Deterrent	Support acting as a greater deterrent and/or increased compliance	39%	22
Opposition - Financial	Concern about affordability/impact of cost	12%	7
Support - Journey Times	Support given potential improvement to journey times	9%	5

Theme	Code	Number	% out of 57
Opposition - Businesses	Concern about impact on businesses	9%	5
Neutral - No Impact	Not impacted by the increase in charge (general)	9%	5
Support - Deterrent	Support a reduction in dangerous driving	7%	4
Opposition - Equality and Fairness	Concern about unfairly punishing a mistake/ unavoidable situation	7%	4
Support - Governance	Support for recovering costs to councils to manage services	4%	2
Support - Road Safety	Support improved road safety for cyclists/ walkers	4%	2
Support - Traffic	Support improved congestion levels for drivers	4%	2

Part 6 – Discount Rate of 50%

The current penalty charge discount rate of 50% is set to encourage early payment and has worked well - with a high proportion of all parking, bus lane and moving traffic penalty charges being paid within the discount period (usually within 14 days of receiving the penalty).

The table below shows the penalty charge amounts when the discount rate of 50% has been applied:

Penalty Charge Levels	Band A (Higher)	Band A (Lower)	Band B (Higher)	Band B (Lower)
Current Penalty Charge Level	£130	£80	£110	£60
Current Discount at 50%	£65	£40	£55	£30

Question 23: Do you think that the discount rate for early payment should remain at 50%?

- See Table 23
- A total of 1,538 respondents gave us their opinion on the discount rate, with a majority of 635 saying that they should stay at 50%
- 289 respondents believe that the discount rate should be less than 50%, whilst 575 think that it should be more than 50%
- 39 respondents were unsure about this
- 496 respondents skipped this question

Table 23: Should the discount rate remain at 50%?

Answer Choices	Total
Yes – it should remain at 50%	635
No – it should be less than 50%	289
No – it should be more than 50%	575
I don't know	39
Total responses	1,538
Skipped the question	496

Question 24 – If you selected ‘No’ to any of the options above, please specify below how much you think the discount rate should be?

- See Table 24
- A total of 864 respondents did not agree with the discount rate remaining at 50% and a total of 837 respondents provided us with alternative suggestions as to what the discount rate should be (see *Tables 24a and 24b*)
- 1,197 respondents skipped this question

Table 24: Feedback responses

Answer Choices	Total
Total 'No' responses to Question 23	864
Total additional open comments	837
Skipped the question	1,197

- See Tables 24a and 24b
- In total, 837 respondents provided a response
- The most common responses, considered specific rates for the discount, which have been analysed along a set of discount brackets as shown in *Figure 4*
- 373 respondents suggested a discount between 61% and 80% in value, followed by 138 suggested a discount between 21% and 40% in value
- Only 36 suggested that there should be no discount at all, while 24 suggested a discount should be variable along a sliding scale, depending on time elapsed until payment is received
- A further 23 expressed concern about the affordability of the fines

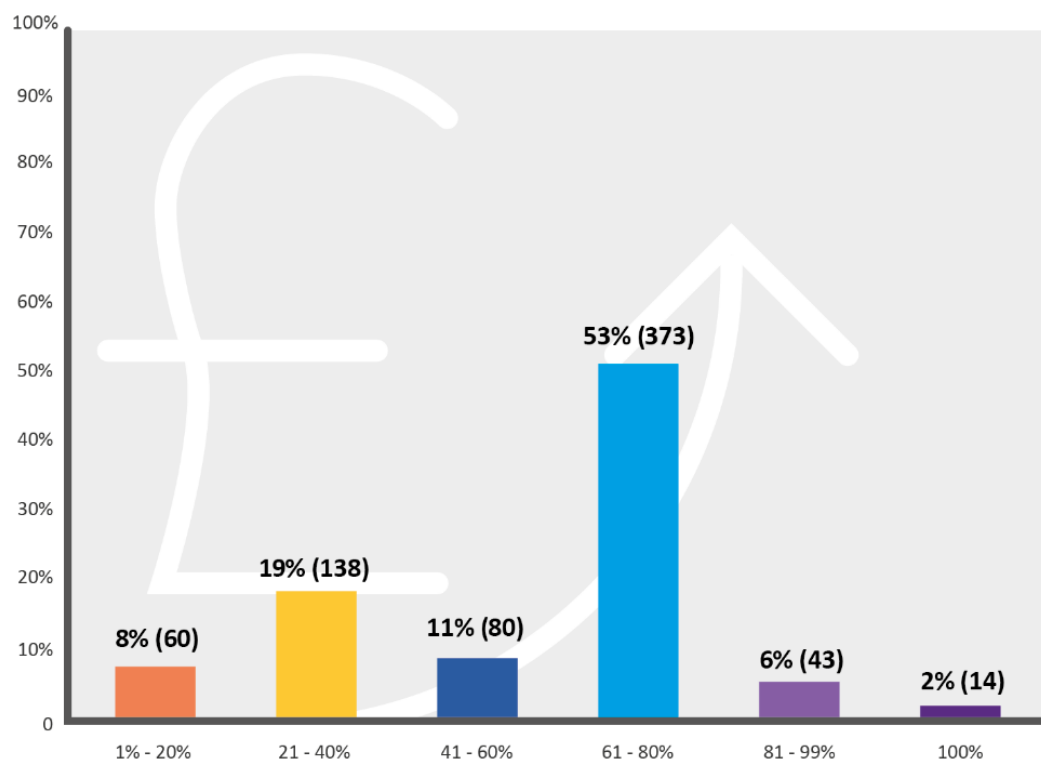
Table 24a – All Themes raised by Individuals and Stakeholders to Question 24

Theme	Code	Number	% out of 837
Specified Percentage for Discount	From 61% to 80%	373	45%
Specified Percentage for Discount	From 21% to 40%	138	16%
Specified Percentage for Discount	From 41% to 60%	80	10%
Specified Percentage for Discount	From 1% to 20%	46	5%
Specified Percentage for Discount	From 81% to 99%	43	5%
Support - Charging	Support for no discount at all	36	4%
Support - Charging	Support for a sliding scale of discounts based on time	24	3%
Opposition - Financial	Concern about affordability/ impact of cost	23	3%
Support - Charging	Suggestion to increase the discount for payments made in under 7 days	20	2%
Support - Charging	Support for discount to encourage payment	19	2%

Theme	Code	Number	% out of 837
Support - Deterrent	Support acting as a greater deterrent and/or increased compliance	16	2%
Specified Value of Discount	From £1 to £30	15	2%
Specified Percentage for Discount	0%	14	2%
Specified Percentage for Discount	100%	14	2%
Opposition - Deterrent	Concern the discounts encourage continued poor behaviour	14	2%
Suggestions - Charge structure	Suggestion for discount rate to differ for repeat offenders	14	2%
Opposition - General	Concern it is a 'money making' scheme	13	2%
Suggestions - Charge structure	Suggestion for discount rate to differ on circumstances	12	1%
Support - Charging	General support for discount for early payments	10	1%
Opposition - Equality and Fairness	Concern about unfairness punishing a mistake/ unavoidable situation	10	1%

- Figure 4 below provides a breakdown of responses which suggested a specific discount rate percentage
- Percentages are calculated from the total number of respondents that provided specific amounts, rather than the total number of respondents to this question

Figure 4: How much should the discount rate be...



- 29 respondents identified themselves as stakeholders
- Their top points raised are presented in Table 24.b

Table 24b – Top 10 codes raised by Stakeholders to Question 24

Theme	Code	Number	% out of 29
Specified Percentage for Discount	From 21% to 40%	31%	9
Specified Percentage for Discount	From 41% to 60%	17%	5
Specified Percentage for Discount	From 61% to 80%	17%	5
Specified Value of Discount	From £0 to £30	10%	3
Opposition - Charging	Concern the discount rate makes the charges too low	7%	2

Theme	Code	Number	% out of 29
Specified Percentage for Discount	100%	7%	2
Opposition - Deterrent	Concern the discounts encourage continued poor behaviour	7%	2
Support - Charging	General support for discount for early payments	3%	1
Support - Charging	Support for no discount at all	3%	1
Support - Charging	Support for discount to encourage payment	3%	1

Part 7 – Charge Certificate Surcharge of 50%

A Charge Certificate is a legal notice issued by a London borough that increases the penalty charge by 50%, if the penalty remains unpaid.

The table below shows the increased penalty charge amount, when a Charge Certificate surcharge of 50% has been applied:

Penalty Charge Levels	Band A (Higher)	Band A (Lower)	Band B (Higher)	Band B (Lower)
Current Penalty Charge Level	£130	£80	£110	£60
Current Surcharge at 50%	£195	£120	£165	£90

Question 25: Do you agree that the Charge Certificate surcharge should continue to increase the penalty charge by 50%?

- See Table 25
- A total of 1,523 respondents gave us their opinion on the surcharge rate, with a majority of 641 saying that it should increase by less than 50%
- 561 respondents believe that the surcharge rate should stay at an increased amount of 50%, whilst 147 think that it should be more than 50%
- 174 respondents were unsure about this
- 511 respondents skipped this question

Table 25: Should the surcharge rate continue to be 50%?

Answer Choices	Total
Yes – it should continue to increase by 50%	561
No – it should increase less than 50% (please specify)	641
No – it should increase by more than 50% (please specify)	147
I don't know	174
Total responses	1,523
Skipped the question	511

Question 26 – If you selected 'No' to any of the above options, please specify below how much you think the surcharge increase should be changed to?

- See Table 26
- A total of 788 respondents did not agree with the surcharge rate remaining at 50% and a total of 757 respondents provided us with alternative suggestions as to what the surcharge rate should be (see Tables 26a and 26b)
- 1,246 respondents skipped this question

Table 26: Feedback responses

Answer Choices	Total
Total 'No' responses to Question 25	788
Total additional open comments	757
Skipped the question	1,246

- See *Tables 26a and 26b*
- A total of 757 most common responses considered specific rates of surcharge, which have been analysed along a set of percentage increase brackets
- 166 respondents suggested that the surcharge should be between 21% and 40% in value, followed by 156 suggesting between 1% and 20% in value
- A further 41 respondents suggested that the surcharge should stay the same, while 26 expressed concern that the surcharge disadvantages those who cannot afford the charges, and a further 22 commented on the increase in the context of the cost of living crisis and high inflation

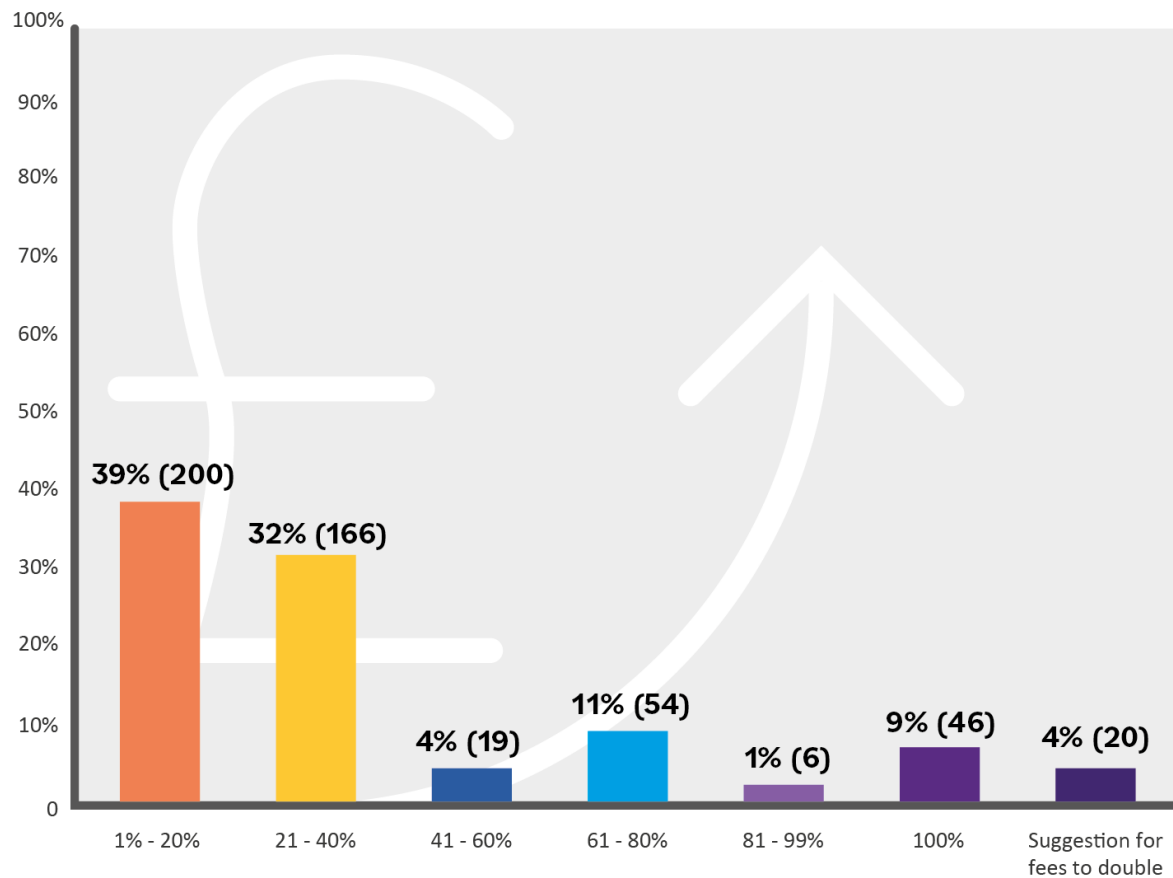
Table 26a – All Themes raised by Individuals and Stakeholders to Question 26

Theme	Code	Number	% out of 757
Specified Percentage for Increase	From 21% to 40%	166	22%
Specified Percentage for Increase	From 1% to 20%	156	21%
Specified Percentage for Increase	0%	87	11%
Specified Percentage for Increase	From 61% to 80%	54	7%
Specified Percentage for Increase	100%	46	6%
Support - Charges	Support for the surcharge to stay the same	41	5%
Opposition - Equality and Fairness	Concern surcharge disadvantages those who cannot afford charges	26	3%
Opposition - Affordability	Concern about impact on cost of living/ high inflation	22	3%
Support - Charges	Support for a decrease in all charges	21	3%
Specified Percentage for Increase	Suggestion for the fee to double	20	3%

Theme	Code	Number	% out of 757
Opposition - Governance	Concern it is a 'money making scheme'	19	3%
Specified Percentage for Increase	From 41% to 60%	19	3%
Opposition - Governance	Concern about the governance and administration of the penalty charge system and communication	18	2%
Support - Charges	Support for no surcharge at all	17	2%
Opposition - Charges	General opposition to surcharge	16	2%
Opposition - Equality and Fairness	Concern motorists are unfairly targeted (anti-motorist agenda)	16	2%
Specified Value of Increase	From £0 to £30	14	2%
Opposition - Equality and Fairness	Concern individuals pay the surcharge due to limited time to pay/ extenuating circumstances	14	2%
Support - Deterrent	Support acting as a greater deterrent and/or increased compliance	13	2%

- *Figure 5* below provides a breakdown of responses which suggested a specific surcharge value, as percentages.
- Percentages are calculated from the total number of respondents that provided specific amounts, rather than the total number of respondents to this question.

Figure 5: How much should the surcharge increase be changed to?



- 31 respondents identified themselves as stakeholders.
- Their top points raised are presented in Table 26b

Table 26b – Top 10 codes raised by Stakeholders to Question 26

Theme	Code	Number	% out of 31
Specified Percentage for Increase	0%	29%	9
Specified Percentage for Increase	From 21% to 40%	16%	5
Specified Percentage for Increase	From 1% to 20%	13%	4
Support - Charges	Support for no surcharge at all	6%	2
Opposition - Governance	Concern it is a 'money making scheme'	6%	2
Specified Percentage for Increase	100%	6%	2
Opposition - Equality and Fairness	Concern the higher surcharge will cause stress	6%	2
Support - Charges	General support for surcharge	3%	1
Support - Charges	Support to increase surcharge for late payment	3%	1
Support - Charges	Support for the surcharge to stay the same	3%	1

London Councils' Consideration of Issues Raised

How to read this section?

London Councils has analysed and grouped the responses provided in free text answers to the consultation questions numbered 11-26. These are presented below alongside London Councils' responses to the issues raised.

In cases where issues would have no material impact on London Councils' decision making, London Councils has responded 'not applicable (n/a)'.

Where issues support or go against London Councils recommendations, a response is provided, so that survey respondents can understand the rationale for London Councils' proposals. It should be noted that the results of the consultation are designed to help London Councils take into account the relevant factors when making a decision. The consultation is not a vote or referendum and in many cases London Councils' proposals do not align with the options that were most commonly proposed by respondents.

In some cases, London Councils responses cover a number of similar or related issues. Where this is the case, a reference is provided to a previous response within that group of issues.

For example,

- Issue 11.2 (below) is supportive of intruding a single penalty band throughout London as a means of improving clarity and reducing confusion. London Councils sets out in its response why it considers that retaining separate bands is preferable.
- Issue 11.3 raises the concern that a single band would increase costs. As London Councils response to 11.2 can also be used to demonstrate that this issue has been taken into consideration, a reference is provided to that response (see 11.2).

This approach is used throughout this section of the report. However, it should be noted that the type of referencing described above has been used within and not across questions. While this approach leads to some responses to be repetitious / similar to responses provided previously, on balance London Councils considered that such an approach was needed to demonstrate consideration had been given to proposals across the range of questions asked and to reassure decision makers of this fact.

Ref	Issue Raised	London Councils Response
Question 11: What would be the impact on you if a single penalty band was introduced throughout London?		
11.1	Not impacted by the increase in charge (general)	n/a
11.2	Support improved clarity/reducing confusion	<p>Despite the increase in boroughs applying for Band A over the last decade, and the consultation shows that most respondents would not be impacted by any change, London Councils does not recommend the adoption of a single band (Band A) at this stage.</p> <p>London Councils believes that abandoning the two-tier banding regime would remove the future local flexibility to deal with issues relating to non-compliance. Band B boroughs will continue to have the option to apply for Band A status if they can clearly demonstrate that any new increased penalty charge levels introduced (because of this or any future consultations) has not improved compliance of the parking rules and regulations.</p> <p>More importantly, adopting a single band at Band A for all boroughs at this stage, would represent a substantial increase in the penalty levels for existing Band B authorities. If this were adopted, together with any further increases in the overall penalty levels across London, the value of a Band B, lower-level PCN for example would nearly double.</p>
11.3	Suggestion that main impact is an increased cost	See 11.2
11.4	Concern about affordability/impact of cost	<p>Penalties can be avoided by complying with relevant parking and traffic regulations. The increase in the PCN level will only impact drivers that contravene the rules for parking on borough roads.</p> <p>The restrictions are in place for the safety and reliability of the network. We</p>

		<p>believe a higher PCN level will deter dangerous and inconsiderate parking behaviours which cause safety risks, disruption, and congestion for other road users.</p> <p>See also 11.2 and the mitigations listed in 11.8</p>
11.5	Concern that initiative is a 'money making' scheme	<p>London boroughs have a legal duty under Section 16 of the Traffic Management Act 2004 to manage the road network with a view to ensuring the expeditious movement of traffic so far as is reasonably practicable and may take action to ensure the efficient and uncongested use of their road network.</p> <p>Parking and road traffic enforcement is a key tool to help manage motorists' behaviour on these roads. PCNs serve as an active deterrent that can help influence whether a motorist will contravene the regulations that are in place for improving the safety and reliability of the borough road network.</p> <p>By law, net revenues from contraventions must be used for relevant transport and environmental purposes in London. Income also covers the cost of the enforcement operation.</p> <p>Boroughs use any surplus revenue to make improvements to their transport infrastructure and to pay for concessionary fares – the Freedom Pass.</p>
11.6	Not impacted due to compliance/only impact those who do not comply	London Councils supports this view.
11.7	Support for consistency across London	See 11.2
11.8	Concern about unfairness punishing a mistake/unavoidable situation	<p>Boroughs use parking and moving traffic enforcement to improve compliance, not to penalise drivers. They actively promote the rules of their roads as well as ensuring that all on-street signage and infrastructure required to enforce the rules is fit for purpose.</p> <p>Signs and road markings on borough roads are there to inform drivers what they can and cannot do. To avoid being issued with a PCN, road users should ensure that they follow these signs and road markings.</p>

		<p>The rules for borough road networks are clearly explained in the latest edition of the Highway Code and are also explained on the London Councils website https://www.londoncouncils.gov.uk/services/parking-services/how-park-your-car-london</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/loading-and-unloading</p> <p>All PCNs include information about making a representation (challenging the PCN) to the issuing Authority and how long customers have got to do it. Representations can be made, online, in writing or via the phone service. Discounts are available for prompt payment.</p> <p>Following this stage, road users can appeal to the tribunal. More information, including escalation to London Tribunals can be found here: https://www.londontribunals.gov.uk/</p>
11.8	Support acting as a greater deterrent and/or increased compliance	See 11.2
11.9	Support a reduction in dangerous parking	See 11.5
11.10	Concern about disproportionate impacts outside of central London (where public transport is more limited)	See 11.2
11.11	Concern about single penalty band being at higher rate	See 11.2
11.12	Concern about impacts on cost of living and high inflation	See 11.4
11.13	Support for single penalty band at lower rate	The restrictions are in place for the safety and reliability of the network. We believe a higher PCN level will deter parking, loading, bus lane and moving traffic

		<p>contraventions which cause safety risks, disruption, and congestion for other road users.</p> <p>The current '<i>value</i>' of a higher-level penalty charge in London (which include bus lane and moving traffic PCNs) is 43.6% lower in '<i>real terms</i>' (or the '<i>comparative level</i>') than they were when last amended in 2011.</p> <p>The penalty level for lower-level parking contraventions, have not been amended since 2007. As a result, the current value of PCNs is 64.1% lower in real terms.</p> <p>Since penalty levels were last reviewed, there has been an overall decline in compliance. See:</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/enforcement-and-appeals-statistics</p> <p>Penalties need to be set at a sufficient level to achieve legitimate public policy goals and encourage positive behaviour from motorists and the benefits that this has on congestion, road safety and air quality.</p> <p>Reducing the penalty level would have a detrimental effect on levels of complains and achievement of public policy goals.</p>
11.14	Support making penalty system fairer	<p>A PCN is a statutory notice. It is a legal requirement that transport authorities include timescales for paying the discounted amount and how to make a representation (challenge) against a PCN.</p> <p>Customers who believe they should not have received a PCN for a contravention on a borough road or have mitigating circumstances can make a representation to the issuing authority. If the authority rejects the representation, motorists can make an appeal to the independent adjudicator. Should an appeal be lodged, boroughs may use their discretion to hold a discounted payment rate at any time.</p> <p>More information on representations and appeals can be found on transport authority websites and more information about escalation to London Tribunals can be found here: https://www.londontribunals.gov.uk/</p>

11.15	Concern about impact on motorists (inc. anti-motorist sentiment)	<p>The restrictions are in place for the safety and reliability of the network for all motorists. We believe a higher PCN level will deter parking, loading, bus lane and moving traffic contraventions which cause safety risks, disruption, and congestion for other road users.</p> <p>Ninety-five per cent of the road network in London is managed by the boroughs, and with around two billion car journeys made each year, parking and traffic management is integral to maintain the movement of traffic and safety of all road users. In this context enforcement is for the benefit of motorists who comply with the regulations. Any changes to penalty charges will only impact the minority of motorists who do not comply with the regulations.</p> <p>Any form of enforcement that involves penalties, is meant to act as a deterrent, encourage positive behaviour change and increase compliance. Therefore, the PCNs must be set at a level that makes the borough road networks safer, for all London residents and visitors.</p>
11.16	Concern about the reduced levels of income from fines	See 11.4
11.17	Concern about impact on deprived communities	See 11.5 and 11.8
11.18	Impact depends on whether single penalty band is set higher or lower	See 11.2
11.19	Not impacted due to already receiving higher charges	See 11.2 and 11.12

Question 11: Top 10 codes raised by Stakeholders		
11.20	Support improved clarity/reducing confusion	<p>See 11.2</p> <p>London Councils considers that the considerations set out in 11.2 outweigh the advantages of improved clarity / reduced confusion.</p>
11.21	Support acting as a greater deterrent and/or increased compliance	<p>See 11.2</p> <p>London Councils considers that the considerations set out in 11.2 outweigh the advantages of a single band acting as a greater deterrent or increasing compliance.</p> <p>However, we note that Parking and road traffic enforcement is a key tool to help manage driver behaviour on these roads. PCNs serve as an active deterrent that can help influence whether a driver will contravene the regulations that are in place for improving the safety and reliability of the borough road network.</p>
11.22	Not impacted by the increase in charge (general)	n/a
11.23	Support for consistency across London	<p>See 11.2</p> <p>London Councils considers that the considerations set out in 11.2 outweigh the advantages of improved clarity / reduced confusion.</p>
11.24	Support a reduction in dangerous parking	<p>Parking and road traffic enforcement is a key tool to help manage driver behaviour on these roads. PCNs serve as an active deterrent that can help influence whether a driver will contravene the regulations that are in place for improving the safety and reliability of the borough road network.</p>
11.25	Concern about impacts on businesses	See 11.4
11.26	Concern about single penalty band being at higher rate	See 11.2
11.27	Support for a single penalty band at higher rate	See 11.2

11.28	Suggestion that fines should focus on private vehicles instead of commercial drivers	<p>London Councils does not support this view. Parking and road traffic enforcement is a key tool to help manage driver behaviour whether they are driving for private or commercial purposes.</p> <p>PCNs serve as an active deterrent that can help influence whether a driver of any type will contravene the regulations that are in place for improving the safety and reliability of the borough road network.</p>
11.29	Support improved road safety	London Councils supports this position.
<p>Question 12: Do you think that there should be a bigger or smaller difference between the Higher level and Lower level penalty charge, or should they continue to stay the same (e.g. £50)?</p>		
12.1	Suggestion to lower all fines	<p>The restrictions are in place for the safety and reliability of the network. We believe a higher PCN level will deter parking, loading, bus lane and moving traffic contraventions which cause safety risks, disruption, and congestion for other road users.</p> <p>The current '<i>value</i>' of a higher-level penalty charge in London (which include bus lane and moving traffic PCNs) is 43.6% lower in '<i>real terms</i>' (or the '<i>comparative level</i>') than they were when last amended in 2011.</p> <p>The penalty level for lower-level parking contraventions, have not been amended since 2007. As a result, the current value of PCNs is 64.1% lower in real terms.</p> <p>Since penalty levels were last reviewed, there has been an overall decline in compliance. See:</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/enforcement-and-appeals-statistics</p>

		<p>Penalties need to be set at a sufficient level to achieve legitimate public policy goals and encourage positive behaviour from motorists and the benefits that this has on congestion, road safety and air quality.</p> <p>Reducing the penalty level would have a detrimental effect on levels of complains and achievement of public policy goals. London Councils does not support this proposal.</p>
12.2	Concern that charges are 'money making' scheme	<p>London boroughs have a legal duty under Section 16 of the Traffic Management Act 2004 to manage the road network with a view to ensuring the expeditious movement of traffic so far as is reasonably practicable and may take action to ensure the efficient and uncongested use of their road network.</p> <p>Parking and road traffic enforcement is a key tool to help manage driver behaviour on these roads. PCNs serve as an active deterrent that can help influence whether a driver will contravene the regulations that are in place for improving the safety and reliability of the borough road network.</p> <p>By law, net revenues from contraventions must be used for relevant transport and environmental purposes in London. Income also covers the cost of the enforcement operation.</p> <p>Boroughs use excess revenue to make improvements to their transport infrastructure and to pay for concessionary fares – the Freedom Pass.</p>
12.3	Concern that charges are too high (general)	<p>Penalties can be avoided by complying with relevant parking and moving traffic restrictions. The increase in the PCN level will only impact drivers that contravene the rules for parking, loading, bus lane and moving traffic contraventions on borough roads.</p> <p>The restrictions are in place for the safety and reliability of the network. We believe a higher PCN level will deter parking, loading, bus lane and moving traffic contraventions which cause safety risks, disruption, and congestion for other road users.</p>

		<p>Boroughs use parking and moving traffic enforcement to improve compliance, not to penalise drivers. They actively promote the rules of their roads as well as ensuring that all on-street signage and infrastructure required to enforce the rules is fit for purpose.</p> <p>Signs and road markings on borough roads are there to inform drivers what they can and cannot do. To avoid being issued with a PCN, road users should ensure that they follow these signs and road markings.</p> <p>The rules for borough road networks are clearly explained in the latest edition of the Highway Code and are also explained on the London Councils website https://www.londoncouncils.gov.uk/services/parking-services/how-park-your-car-london</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/loading-and-unloading</p> <p>All PCNs include information about making a representation (challenging the PCN) to the issuing Authority and how long customers have got to do it. Representations can be made, online, in writing or via the phone service. Discounts are available for prompt payment.</p> <p>Following this stage, road users can appeal to the tribunal. More information, including escalation to London Tribunals can be found here: https://www.londontribunals.gov.uk/</p>
12.4	Suggestion for charges to be in line with the severity of offence	London Councils believes the higher and lower charging regime achieves this objective.
12.5	Concern about impacts on cost of living and high inflation	See 12.3
12.6	Concern users are penalised for non-deliberate mistakes	Boroughs use parking and moving traffic enforcement to improve compliance, not to penalise drivers. They actively promote the rules of their roads as well as

		<p>ensuring that all on-street signage and infrastructure required to enforce the rules is fit for purpose.</p> <p>Signs and road markings on borough roads are there to inform drivers what they can and cannot do. To avoid being issued with a PCN, road users should ensure that they follow these signs and road markings.</p> <p>The rules for borough road networks are clearly explained in the latest edition of the Highway Code and are also explained on the London Councils website https://www.londoncouncils.gov.uk/services/parking-services/how-park-your-car-london</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/loading-and-unloading</p> <p>All PCNs include information about making a representation (challenging the PCN) to the issuing Authority and how long customers have got to do it. Representations can be made, online, in writing or via the phone service. Discounts are available for prompt payment.</p> <p>Following this stage, road users can appeal to the tribunal. More information, including escalation to London Tribunals can be found here: https://www.londontribunals.gov.uk/</p>
12.7	Support for no difference between higher and lower charges	London Councils considers that the higher and lower charges are a proportionate means to distinguish between more and less severe contraventions and does not propose to remove this distinction.
12.8	Comments relating to quality of consultation (inc. leading, bias)	London Councils has designed the questions to be able to collect a full range of opinions and does not consider that the questions asked were leading or biased.
12.9	Concern about impacts on motorists (inc. anti-motorist)	The restrictions are in place for the safety and reliability of the network for all motorists. We believe a higher PCN level will deter parking, loading, bus lane and moving traffic contraventions which cause safety risks, disruption, and congestion for other road users.

		<p>Ninety-five per cent of the road network in London is managed by the boroughs, and with around two billion car journeys made each year, parking and traffic management is integral to maintain the movement of traffic and safety of all road users. In this context enforcement is for the benefit of motorists who comply with the regulations. Any changes to penalty charges will only impact the minority of motorists who do not comply with the regulations.</p> <p>Any form of enforcement that involves penalties, is meant to act as a deterrent, encourage positive behaviour change and increase compliance. Therefore, the PCNs must be set at a level that makes the borough road networks safer, for all London residents and visitors.</p>
12.10	Support for difference to remain the same	<p>London Councils supports retaining a £50 differential between higher and lower charge levels.</p> <p>This would increase PCNs to new levels that strikes a sensible balance between the real need for higher penalties as a means of increasing compliance and the consideration of financial concerns raised by many respondents. At the same time, it also makes up for some of the devaluation in the lower level PCNs for parking contraventions.</p>
12.11	Suggestion to decrease lower level charges	<p>The penalty level for lower-level parking contraventions, have not been amended since 2007. As a result, the current value of PCNs is 64.1% lower in real terms.</p> <p>Since penalty levels were last reviewed, there has been an overall decline in compliance. See:</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/enforcement-and-appeals-statistics</p> <p>Penalties need to be set at a sufficient level to achieve legitimate public policy goals and encourage positive behaviour from motorists and the benefits that this has on congestion, road safety and air quality.</p>

		Reducing the penalty level would have a detrimental effect on levels of complains and achievement of public policy goals.
12.13	Support for the charge to be high to act as a deterrent (amount unspecified)	<p>Weighing up the arguments for and against, London Councils does not believe that keeping the penalty at the current level is consistent with the wider public policy objective of successfully managing road traffic in London, given the devaluation of the financial deterrent as previously outlined (see 11.12 above).</p> <p>London Councils believes that the current penalty charge levels are too low and recommends that an increase is required to improve compliance with parking and traffic regulations.</p> <p>Nevertheless, officers do not believe that increases at the upper rate of those indicated in the consultation document are appropriate. While an increase of 43.6% (the upper rate for higher level contraventions) would be in line with inflation and would bring the current PCNs in line with today's market value/price, London Councils considers that such a significant increase is not appropriate, as it:</p> <ul style="list-style-type: none"> a. Would be higher than the penalty level on TfL managed roads and undermine consistency across London; and b. Could have a detrimental impact on payment and recovery rates, as a greater number of motorists may struggle to afford to pay and therefore seek to avoid payment.
12.14	Suggestion to raise all fines	See 12.7 and 12.13
12.15	Support for increasing difference (no amount specified)	See 12.7 and 12.10
12.16	Suggestion for all fines to be set at lower level (flat rate)	See 12.1
12.17	Suggestion to increase higher level charges	See 12.13

12.18	Support for scrapping charges	<p>London boroughs have a legal duty under Section 16 of the Traffic Management Act 2004 to manage the road network with a view to ensuring the expeditious movement of traffic so far as is reasonably practicable and may take action to ensure the efficient and uncongested use of their road network.</p> <p>Parking and road traffic enforcement is a key tool to help manage driver behaviour on these roads. PCNs serve as an active deterrent that can help influence whether a driver will contravene the regulations that are in place for improving the safety and reliability of the borough road network.</p> <p>In this context, London Councils does not support this suggestion.</p>
12.19	Suggestion to decrease higher level charges	See 12.18
12.20	Suggestion for charging cars that park obstructively	London Councils supports this in cases where cars parked obstructively contravene existing regulations.
12.21	Concern that system does not act as a deterrent	London Councils believes that the current penalty charge levels are too low and recommends that an increase is required to improve compliance with parking and traffic regulations.
Question 12: Top 10 codes raised by Stakeholders		
12.22	Support for difference to remain the same	See 12.10
12.23	Support for no difference between higher and lower charges	See 12.7
12.24	Support for the charge to be high to act as a deterrent (amount unspecified)	See 12.13
12.25	Suggestion for charges to be in line with the severity of offence	See 12.4

12.26	Support for increasing difference (no amount specified)	See 12.7
12.27	Suggestion for charges for HGVs to be lower than cars	<p>London Councils does not support this view. Parking and road traffic enforcement is a key tool to help manage driver behaviour whether they are driving for private or commercial purposes.</p> <p>PCNs serve as an active deterrent that can help influence whether a driver of any type will contravene the regulations that are in place for improving the safety and reliability of the borough road network.</p>
12.28	Concern that system does not act as a deterrent	See 12.21
12.29	Support for decreasing difference (no amount specified)	See 12.7
12.30	Support for scrapping charges	See 12.18
12.31	Suggestion for higher charges for all (flat rate)	See 12.13
<p>Question 13: Thinking about the current penalty charges, to improve parking behaviours, these should...?</p>		
13.1	Support for decreasing all charges (no specified amount)	<p>The restrictions are in place for the safety and reliability of the network. We believe a higher PCN level will deter parking, loading, bus lane and moving traffic contraventions which cause safety risks, disruption, and congestion for other road users.</p> <p>The current '<i>value</i>' of a higher-level penalty charge in London (which include bus lane and moving traffic PCNs) is 43.6% lower in '<i>real terms</i>' (or the '<i>comparative level</i>') than they were when last amended in 2011.</p>

		<p>The penalty level for lower-level parking contraventions, have not been amended since 2007. As a result, the current value of PCNs is 64.1% lower in real terms.</p> <p>Since penalty levels were last reviewed, there has been an overall decline in compliance. See:</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/enforcement-and-appeals-statistics</p> <p>Penalties need to be set at a sufficient level to achieve legitimate public policy goals and encourage positive behaviour from motorists and the benefits that this has on congestion, road safety and air quality.</p> <p>Reducing the penalty level would have a detrimental effect on levels of complains and achievement of public policy goals. London Councils does not support this proposal.</p>
13.2	Concern about impacts on cost of living/lower incomes	<p>Penalties can be avoided by complying with relevant parking and moving traffic restrictions. The increase in the PCN level will only impact drivers that contravene the rules for parking, loading, bus lane and moving traffic contraventions on borough roads.</p> <p>The restrictions are in place for the safety and reliability of the network. We believe a higher PCN level will deter parking, loading, bus lane and moving traffic contraventions which cause safety risks, disruption, and congestion for other road users.</p> <p>Boroughs use parking and moving traffic enforcement to improve compliance, not to penalise drivers. They actively promote the rules of their roads as well as ensuring that all on-street signage and infrastructure required to enforce the rules is fit for purpose.</p> <p>Signs and road markings on borough roads are there to inform drivers what they can and cannot do. To avoid being issued with a PCN, road users should ensure that they follow these signs and road markings.</p>

		<p>The rules for borough road networks are clearly explained in the latest edition of the Highway Code and are also explained on the London Councils website https://www.londoncouncils.gov.uk/services/parking-services/how-park-your-car-london</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/loading-and-unloading</p> <p>All PCNs include information about making a representation (challenging the PCN) to the issuing Authority and how long customers have got to do it. Representations can be made, online, in writing or via the phone service. Discounts are available for prompt payment.</p> <p>Following this stage, road users can appeal to the tribunal. More information, including escalation to London Tribunals can be found here: https://www.londontribunals.gov.uk/</p>
13.3	For all lower charges to be between £1-£50	<p>The restrictions are in place for the safety and reliability of the network. We believe a higher PCN level will deter parking, loading, bus lane and moving traffic contraventions which cause safety risks, disruption, and congestion for other road users.</p> <p>The current '<i>value</i>' of a higher-level penalty charge in London (which include bus lane and moving traffic PCNs) is 43.6% lower in '<i>real terms</i>' (or the '<i>comparative level</i>') than they were when last amended in 2011.</p> <p>The penalty level for lower-level parking contraventions, have not been amended since 2007. As a result, the current value of PCNs is 64.1% lower in real terms.</p> <p>Since penalty levels were last reviewed, there has been an overall decline in compliance. See: https://www.londoncouncils.gov.uk/services/parking-services/enforcement-and-appeals-statistics</p>

		<p>Penalties need to be set at a sufficient level to achieve legitimate public policy goals and encourage positive behaviour from motorists and the benefits that this has on congestion, road safety and air quality.</p> <p>Reducing the penalty level would have a detrimental effect on levels of complains and achievement of public policy goals. London Councils does not support this proposal.</p>
13.4	For all higher charges to be between £1-£50	See 13.3
13.5	Concern the charges are too high	See 13.1 and 13.2
13.6	Concern that charges are 'money making' scheme	<p>London boroughs have a legal duty under Section 16 of the Traffic Management Act 2004 to manage the road network with a view to ensuring the expeditious movement of traffic so far as is reasonably practicable and may take action to ensure the efficient and uncongested use of their road network.</p> <p>Parking and road traffic enforcement is a key tool to help manage driver behaviour on these roads. PCNs serve as an active deterrent that can help influence whether a driver will contravene the regulations that are in place for improving the safety and reliability of the borough road network.</p> <p>By law, net revenues from contraventions must be used for relevant transport and environmental purposes in London. Income also covers the cost of the enforcement operation.</p> <p>Boroughs use excess revenue to make improvements to their transport infrastructure and to pay for concessionary fares – the Freedom Pass.</p>
13.7	For lower Band B to be decreased (less than £60)	See 13.3
13.8	For lower Band A to be decreased (less than £80)	See 13.3
13.9	Support for charges to remain the same	See 13.3
13.10	For all lower charges to be between £50-£100	See 13.3

13.11	Suggestion for charges to rise above levels of inflation	<p>London Councils does not believe this would be proportionate. London Councils does believe that the current penalty charge levels are too low and recommends that an increase is required to improve compliance with parking and traffic regulations.</p> <p>Nevertheless, officers do not believe that increases at beyond the upper rate of those indicated in the consultation document are appropriate, as they:</p> <ul style="list-style-type: none"> a. Would be higher than the penalty level on TfL managed roads and undermine consistency across London; and b. Could have a detrimental impact on payment and recovery rates, as a greater number of motorists may struggle to afford to pay and therefore seek to avoid payment.
13.12	For all higher charges to be between £50-£100	See 13.3
13.13	For higher Band B to be decreased (less than £110)	See 13.3
13.14	For higher Band A to be decreased (less than £130)	See 13.3
13.15	Suggestion to link charges to income	London Councils does not support this suggestion as it would add additional burden on motorists and cost to authorities to administer. It is also questionable whether the current regulations allow for differential charging linked to income.
13.16	Support for scrapping charges	See 13.3
13.17	Concern the charges aren't working as a deterrent	London Councils believes that the current penalty charge levels are too low and recommends that an increase is required to improve compliance with parking and traffic regulations.
13.18	Support for the charge to be high to act as a deterrent (amount unspecified)	See 13.11
13.19	Concern users are penalised for non-deliberate mistakes	Boroughs use parking and moving traffic enforcement to improve compliance, not to penalise drivers. They actively promote the rules of their roads as well as

		<p>ensuring that all on-street signage and infrastructure required to enforce the rules is fit for purpose.</p> <p>Signs and road markings on borough roads are there to inform drivers what they can and cannot do. To avoid being issued with a PCN, road users should ensure that they follow these signs and road markings.</p> <p>The rules for borough road networks are clearly explained in the latest edition of the Highway Code and are also explained on the London Councils website https://www.londoncouncils.gov.uk/services/parking-services/how-park-your-car-london</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/loading-and-unloading</p> <p>All PCNs include information about making a representation (challenging the PCN) to the issuing Authority and how long customers have got to do it. Representations can be made, online, in writing or via the phone service. Discounts are available for prompt payment.</p> <p>Following this stage, road users can appeal to the tribunal. More information, including escalation to London Tribunals can be found here: https://www.londontribunals.gov.uk/</p>
13.20	Support for increasing charges (no amount specified)	<p>London Councils agrees and proposes that the level of parking penalties should be increased to the following levels:</p> <ul style="list-style-type: none"> ○ Band A Higher Level = £160 ○ Band A Lower Level = £110 ○ Band B Higher Level = £140 ○ Band B Lower Level = £90

		London Councils also agrees that the penalty charge for Bus Lane and Moving Traffic contraventions on borough roads be the same as the highest penalty charge for Parking in Band A = £160
Question 13: Top 10 codes raised by Stakeholders		
13.21	Support for decreasing all charges (no specified amount)	See 13.3
13.22	Other	n/a
13.23	Suggestion for charges for HGVs to be lower than cars	<p>London Councils does not support this view. Parking and road traffic enforcement is a key tool to help manage driver behaviour whether they are driving for private or commercial purposes.</p> <p>PCNs serve as an active deterrent that can help influence whether a driver of any type will contravene the regulations that are in place for improving the safety and reliability of the borough road network.</p>
13.24	Concern the charges are too high	See 13.1 and 13.2
13.25	Support for increasing charges (no amount specified)	See 13.20
13.26	Support for scrapping charges	See 13.3
13.27	Support for the charge to be high to act as a deterrent (amount unspecified)	See 13.11
13.28	Suggestion for charges to rise above levels of inflation	See 13.11
13.29	Concern about impacts on cost of living/lower incomes	See 13.2

13.30	Other	n/a
Question 14: How would you be impacted if parking penalty charges were to increase?		
14.1	Not impacted by the increase in charge	n/a
14.2	Concern that charges will be unaffordable	<p>Penalties can be avoided by complying with relevant parking and moving traffic restrictions. The increase in the PCN level will only impact drivers that contravene the rules for parking, loading, bus lane and moving traffic contraventions on borough roads.</p> <p>The restrictions are in place for the safety and reliability of the network. We believe a higher PCN level will deter parking, loading, bus lane and moving traffic contraventions which cause safety risks, disruption, and congestion for other road users.</p> <p>Boroughs use parking and moving traffic enforcement to improve compliance, not to penalise drivers. They actively promote the rules of their roads as well as ensuring that all on-street signage and infrastructure required to enforce the rules is fit for purpose.</p> <p>Signs and road markings on borough roads are there to inform drivers what they can and cannot do. To avoid being issued with a PCN, road users should ensure that they follow these signs and road markings.</p> <p>The rules for borough road networks are clearly explained in the latest edition of the Highway Code and are also explained on the London Councils website https://www.londoncouncils.gov.uk/services/parking-services/how-park-your-car-london</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/loading-and-unloading</p>

		<p>All PCNs include information about making a representation (challenging the PCN) to the issuing Authority and how long customers have got to do it. Representations can be made, online, in writing or via the phone service. Discounts are available for prompt payment.</p> <p>Following this stage, road users can appeal to the tribunal. More information, including escalation to London Tribunals can be found here: https://www.londontribunals.gov.uk/</p>
14.3	Concern that this is a particularly bad time due to cost of living and high inflation	See 14.2
14.4	Support the PCN increase to act as more of a deterrent and/or increase compliance	<p>London Councils agrees and proposes that the level of parking penalties should be increased to the following levels:</p> <ul style="list-style-type: none"> ○ Band A Higher Level = £160 ○ Band A Lower Level = £110 ○ Band B Higher Level = £140 ○ Band B Lower Level = £90 <p>London Councils also agrees that the penalty charge for Bus Lane and Moving Traffic contraventions on borough roads be the same as the highest penalty charge for Parking in Band A = £160</p> <p>The restrictions are in place for the safety and reliability of the network. We believe a higher PCN level will deter parking, loading, bus lane and moving traffic contraventions which cause safety risks, disruption, and congestion for other road users.</p> <p>The current '<i>value</i>' of a higher-level penalty charge in London (which include bus lane and moving traffic PCNs) is 43.6% lower in '<i>real terms</i>' (or the '<i>comparative level</i>') than they were when last amended in 2011.</p>

		<p>The penalty level for lower-level parking contraventions, have not been amended since 2007. As a result, the current value of PCNs is 64.1% lower in real terms.</p> <p>Since penalty levels were last reviewed, there has been an overall decline in compliance. See:</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/enforcement-and-appeals-statistics</p> <p>Penalties need to be set at a sufficient level to achieve legitimate public policy goals and encourage positive behaviour from motorists and the benefits that this has on congestion, road safety and air quality.</p>
14.5	Not impacted as rules would be followed	London Councils agrees with this position and notes response provided in 14.2.
14.6	Concern about the reduced levels of income from fines	<p>London boroughs have a legal duty under Section 16 of the Traffic Management Act 2004 to manage the road network with a view to ensuring the expeditious movement of traffic so far as is reasonably practicable and may take action to ensure the efficient and uncongested use of their road network.</p> <p>Parking and road traffic enforcement is a key tool to help manage driver behaviour on these roads. PCNs serve as an active deterrent that can help influence whether a driver will contravene the regulations that are in place for improving the safety and reliability of the borough road network.</p> <p>By law, net revenues from contraventions must be used for relevant transport and environmental purposes in London. Income also covers the cost of the enforcement operation.</p> <p>Boroughs use excess revenue to make improvements to their transport infrastructure and to pay for concessionary fares – the Freedom Pass.</p>
14.7	Concern about increased costs	See 14.2

14.8	Concern about unfairness punishing a mistake/ unavoidable situation	<p>Boroughs use parking and moving traffic enforcement to improve compliance, not to penalise drivers. They actively promote the rules of their roads as well as ensuring that all on-street signage and infrastructure required to enforce the rules is fit for purpose.</p> <p>Signs and road markings on borough roads are there to inform drivers what they can and cannot do. To avoid being issued with a PCN, road users should ensure that they follow these signs and road markings.</p> <p>The rules for borough road networks are clearly explained in the latest edition of the Highway Code and are also explained on the London Councils website https://www.londoncouncils.gov.uk/services/parking-services/how-park-your-car-london</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/loading-and-unloading</p> <p>All PCNs include information about making a representation (challenging the PCN) to the issuing Authority and how long customers have got to do it. Representations can be made, online, in writing or via the phone service. Discounts are available for prompt payment.</p> <p>Following this stage, road users can appeal to the tribunal. More information, including escalation to London Tribunals can be found here: https://www.londontribunals.gov.uk/</p>
14.9	Support improvements to quality and availability of parking	See 14.6
14.10	Concern that initiative is a 'money making' scheme	See 14.6
14.11	Support improved road safety	See 14.6
14.12	Fewer obstructions on roads and pavements due to higher compliance	See 14.6

14.13	Concern about lack of adequate marking/signage	See 14.8
14.14	Support modal shift to sustainable transport modes	See 14.6
14.15	Visit London/area less frequently	See 14.2 and 14.8
14.16	Concern charges are already high enough	See 14.2
14.17	Against charge increases for parking	See 14.2
14.18	Negative effect on mental health & more stressful environment	See 14.8
14.19	Concern about impact on motorists (inc. anti-motorist sentiment)	<p>The restrictions are in place for the safety and reliability of the network for all motorists. We believe a higher PCN level will deter parking, loading, bus lane and moving traffic contraventions which cause safety risks, disruption, and congestion for other road users.</p> <p>Ninety-five per cent of the road network in London is managed by the boroughs, and with around two billion car journeys made each year, parking and traffic management is integral to maintain the movement of traffic and safety of all road users. In this context enforcement is for the benefit of motorists who comply with the regulations. Any changes to penalty charges will only impact the minority of motorists who do not comply with the regulations.</p> <p>Any form of enforcement that involves penalties, is meant to act as a deterrent, encourage positive behaviour change and increase compliance. Therefore, the PCNs must be set at a level that makes the borough road networks safer, for all London residents and visitors.</p>
14.20	Negative Impact (general)	See 14.19

Question 14: Top 10 codes raised by stakeholders		
14.21	Support the PCN increase to act as more of a deterrent and/or increase compliance	See 14.4
14.22	Acknowledge the requirement for increased charges due to inflation and/or rising costs to support the running of current parking operations	See 14.4
14.23	Concern about impacts on businesses	<p>The restrictions on borough roads, which comprises of 95% of the network in London, are essential for the safety and reliability of the road network. Improving the compliance with the rules benefits all road users, including businesses.</p> <p>London boroughs work with the freight and servicing operators and local businesses to consider the design and management of local access, off-street space for loading and on-street loading restrictions in the early design stages, to reduce the impact of freight and servicing on streets.</p>
14.24	Concern that charges will be unaffordable	See 14.2
14.25	Support improved road safety	See 14.19
14.26	Concern about unfairness punishing a mistake/ unavoidable situation	See 14.8
14.27	Concern about increased costs to businesses being passed on to consumers/ residents	14.2
14.28	Not impacted by the increase in charge	n/a
14.29	Concern about the reduced levels of income from fines	14.6

14.30	Supports increase to align with wider strategies	Effective enforcement helps to improve air quality and promotes active travel and modal shift, as the experience of walking and cycling becomes more viable option in a pleasant and safe environment. This supports the long-term objectives within the Mayor's Transport Strategy, which is adopted by the boroughs as part of their own Transport Strategies.
Question 15: Based on your experience, does the level of dangerous/inconsiderate parking in London concern you?		
15.1	Concern about parking on pavements	Effective enforcement helps to improve air quality and promotes active travel and modal shift, as the experience of walking and cycling becomes more viable option in a pleasant and safe environment.
15.2	Concern about impacts on parking availability	Parking restrictions are in place for the safety and reliability of the network for all motorists. We believe a higher PCN level will deter parking contraventions – including people overstaying – which cause disruption for other road users.
15.3	Comment regarding limited experience in seeing dangerous parking	Twenty-nine per cent of respondents that answered this question raised concerns about dangerous parking and the existing regulatory framework has been designed in part to address inconsiderate and dangerous parking, so while these respondents may not have seen or experienced dangerous parking, it does happen.
15.4	Suggestion for greater enforcement	<p>Parking and road traffic enforcement is a key tool to help manage driver behaviour on these roads. PCNs serve as an active deterrent that can help influence whether a driver will contravene the regulations that are in place for improving the safety and reliability of the borough road network.</p> <p>By law, net revenues from contraventions must be used for relevant transport and environmental purposes in London. Income also covers the cost of the enforcement operation.</p>

15.5	General concern about negative impacts	<p>Boroughs use parking and moving traffic enforcement to improve compliance, not to penalise drivers. They actively promote the rules of their roads as well as ensuring that all on-street signage and infrastructure required to enforce the rules is fit for purpose.</p> <p>Signs and road markings on borough roads are there to inform drivers what they can and cannot do. To avoid being issued with a PCN, road users should ensure that they follow these signs and road markings.</p> <p>The rules for borough road networks are clearly explained in the latest edition of the Highway Code and are also explained on the London Councils website https://www.londoncouncils.gov.uk/services/parking-services/how-park-your-car-london</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/loading-and-unloading</p> <p>All PCNs include information about making a representation (challenging the PCN) to the issuing Authority and how long customers have got to do it. Representations can be made, online, in writing or via the phone service. Discounts are available for prompt payment.</p> <p>Following this stage, road users can appeal to the tribunal. More information, including escalation to London Tribunals can be found here: https://www.londontribunals.gov.uk/</p>
15.6	No concern (general)	<p>The restrictions are in place for the safety and reliability of the network for all motorists. We believe a higher PCN level will deter parking, loading, bus lane and moving traffic contraventions which cause safety risks, disruption, and congestion for other road users.</p> <p>Ninety-five per cent of the road network in London is managed by the boroughs, and with around two billion car journeys made each year, parking and traffic management is integral to maintain the movement of traffic and safety of all road</p>

		users. In this context enforcement is for the benefit of motorists who comply with the regulations. Any changes to penalty charges will only impact the minority of motorists who do not comply with the regulations.
15.7	Concern about dangerous/ inconsiderate parking	See 15.1
15.8	Concern it is a 'money making scheme'	<p>London boroughs have a legal duty under Section 16 of the Traffic Management Act 2004 to manage the road network with a view to ensuring the expeditious movement of traffic so far as is reasonably practicable and may take action to ensure the efficient and uncongested use of their road network.</p> <p>Parking and road traffic enforcement is a key tool to help manage driver behaviour on these roads. PCNs serve as an active deterrent that can help influence whether a driver will contravene the regulations that are in place for improving the safety and reliability of the borough road network.</p> <p>By law, net revenues from contraventions must be used for relevant transport and environmental purposes in London. Income also covers the cost of the enforcement operation.</p> <p>Boroughs use excess revenue to make improvements to their transport infrastructure and to pay for concessionary fares – the Freedom Pass.</p>
15.9	Concern about dangerous parking over yellow lines	Parking and road traffic enforcement is a key tool to help manage driver behaviour on these roads. PCNs serve as an active deterrent that can help influence whether a driver will contravene the regulations that are in place for improving the safety and reliability of the borough road network.
15.10	Concern about parking in cycle lanes	See 15.9
15.11	Suggestion for other methods (not charging) to be considered to improve parking quality	<p>London Councils on behalf of member boroughs has been involved in the British Parking Association's Positive Parking Agenda programme:</p> <p>https://www.polisnetwork.eu/wp-content/uploads/2019/06/being-positive-about-parking-benefits-of-parking-management-in-london-andrew-luck.pdf</p> <p>London Councils also provides information to the public about how to park:</p>

		https://www.londoncouncils.gov.uk/services/parking-services/how-park-your-car-london However, London Councils considers that improved information alone is insufficient to ensure the positive behaviours that parking and moving traffic regulations are designed to promote. In this context, PCNs serve as an active deterrent that can help influence whether a driver will contravene the regulations that are in place for improving the safety and reliability of the borough road network.
15.12	Concern about inconsiderate driving rather than parking	London boroughs have a legal duty under Section 16 of the Traffic Management Act 2004 to manage the road network with a view to ensuring the expeditious movement of traffic so far as is reasonably practicable and may take action to ensure the efficient and uncongested use of their road network. However, the list of enforceable contraventions is limited. The police have powers to enforce against dangerous driving.
15.13	Concern about dangerous parking on corners	See 15.1
15.14	Concern about increased congestion	London boroughs have a legal duty under Section 16 of the Traffic Management Act 2004 to manage the road network with a view to ensuring the expeditious movement of traffic so far as is reasonably practicable and may take action to ensure the efficient and uncongested use of their road network. In this context, PCNs serve as an active deterrent that can help influence whether a driver will contravene the regulations that are in place for improving the safety and reliability of the borough road network.
15.15	Concern about parking near schools	See 15.14
15.16	Suggestion to only charge for uncompliant parking	London Local Authorities can only issue PCNs where there is evidence a vehicle is parked in contravention.
15.17	Suggestion that charges should stay the same	London Councils disagrees and proposes that the level of parking penalties should be increased to the following levels:

		<ul style="list-style-type: none"> ○ Band A Higher Level = £160 ○ Band A Lower Level = £110 ○ Band B Higher Level = £140 ○ Band B Lower Level = £90 <p>London Councils also agrees that the penalty charge for Bus Lane and Moving Traffic contraventions on borough roads be the same as the highest penalty charge for Parking in Band A = £160</p> <p>The restrictions are in place for the safety and reliability of the network. We believe a higher PCN level will deter parking, loading, bus lane and moving traffic contraventions which cause safety risks, disruption, and congestion for other road users.</p> <p>The current ‘<i>value</i>’ of a higher-level penalty charge in London (which include bus lane and moving traffic PCNs) is 43.6% lower in ‘<i>real terms</i>’ (or the ‘<i>comparative level</i>’) than they were when last amended in 2011.</p> <p>The penalty level for lower-level parking contraventions, have not been amended since 2007. As a result, the current value of PCNs is 64.1% lower in real terms.</p> <p>Since penalty levels were last reviewed, there has been an overall decline in compliance. See:</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/enforcement-and-appeals-statistics</p> <p>Penalties need to be set at a sufficient level to achieve legitimate public policy goals and encourage positive behaviour from motorists and the benefits that this has on congestion, road safety and air quality.</p>
15.18	Concern about the behaviour of delivery drivers	<p>London Councils recognises that some people have concerns about this issue. Parking and road traffic enforcement is a key tool to help manage driver behaviour whether they are driving for private or commercial purposes.</p>

		PCNs serve as an active deterrent that can help influence whether a driver of any type will contravene the regulations that are in place for improving the safety and reliability of the borough road network.
Question 15: Top 10 codes raised by Stakeholders		
15.19	Concern about dangerous/ inconsiderate parking	See 15.1
15.20	Support acting as a deterrent and/or increased compliance	See 15.17
15.21	Suggestion for other methods (not charging) to be considered to improve parking quality	See 15.11
15.22	Comment regarding limited experience in seeing dangerous parking	See 15.3
15.23	Concern about impacts on commercial drivers/operations (i.e. deliveries)	See 15.18
15.24	Suggestion that charges should stay the same	See 15.17
15.25	Support the PCN increase to act as more of a deterrent and/or increase compliance	See 15.17
15.26	General concern about negative impacts	See 15.5
15.27	Concern about parking on pavements	See 15.1
15.28	Concern about parking in loading bays	See 15.1 London Councils also provides information to the public about loading and unloading.

		https://www.londoncouncils.gov.uk/services/parking-services/loading-and-unloading
Question 16: Have you noticed a change in the number of dangerous / inconsiderate parking behaviours in London?		
16.1	General increase in number of incidences (non-specific)	<p>London Councils agrees that there has been increase in the number of incidences. Since penalty levels were last reviewed, there has been an overall decline in compliance as evidenced by the number of PCNs issued.</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/enforcement-and-appeals-statistics</p> <p>Penalties need to be set at a sufficient level to achieve legitimate public policy goals and encourage positive behaviour from motorists and the benefits that this has on congestion, road safety and air quality.</p> <p>London Councils proposes that the level of parking penalties should be increased to the following levels:</p> <ul style="list-style-type: none"> ○ Band A Higher Level = £160 ○ Band A Lower Level = £110 ○ Band B Higher Level = £140 ○ Band B Lower Level = £90 <p>London Councils also believes that the penalty charge for Bus Lane and Moving Traffic contraventions on borough roads be the same as the highest penalty charge for Parking in Band A = £160</p> <p>The restrictions are in place for the safety and reliability of the network. We believe a higher PCN level will deter parking, loading, bus lane and moving traffic contraventions which cause safety risks, disruption, and congestion for other</p>

		<p>road users.</p> <p>The current '<i>value</i>' of a higher-level penalty charge in London (which include bus lane and moving traffic PCNs) is 43.6% lower in '<i>real terms</i>' (or the '<i>comparative level</i>') than they were when last amended in 2011.</p> <p>The penalty level for lower-level parking contraventions, have not been amended since 2007. As a result, the current value of PCNs is 64.1% lower in real terms.</p>
16.2	Concern regarding lack of enforcement	<p>London boroughs have a legal duty under Section 16 of the Traffic Management Act 2004 to manage the road network with a view to ensuring the expeditious movement of traffic so far as is reasonably practicable and may take action to ensure the efficient and uncongested use of their road network.</p> <p>Parking and road traffic enforcement is a key tool to help manage driver behaviour on these roads. PCNs serve as an active deterrent that can help influence whether a driver will contravene the regulations that are in place for improving the safety and reliability of the borough road network.</p> <p>By law, net revenues from contraventions must be used for relevant transport and environmental purposes in London. Income also covers the cost of the enforcement operation.</p> <p>London Councils' proposals will help increase the amount of enforcement.</p>
16.3	Concern about the impact of new road layouts (e.g. cycle lanes, road narrowing etc)	<p>Boroughs use parking and moving traffic enforcement to improve compliance, not to penalise drivers. They actively promote the rules of their roads as well as ensuring that all on-street signage and infrastructure required to enforce the rules is fit for purpose.</p> <p>Signs and road markings on borough roads are there to inform drivers what they can and cannot do. To avoid being issued with a PCN, road users should ensure that they follow these signs and road markings.</p> <p>The rules for borough road networks are clearly explained in the latest edition of the Highway Code and are also explained on the London Councils website</p>

		<p>https://www.londoncouncils.gov.uk/services/parking-services/how-park-your-car-london</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/loading-and-unloading</p> <p>All PCNs include information about making a representation (challenging the PCN) to the issuing Authority and how long customers have got to do it. Representations can be made, online, in writing or via the phone service. Discounts are available for prompt payment.</p> <p>Following this stage, road users can appeal to the tribunal. More information, including escalation to London Tribunals can be found here:</p> <p>https://www.londontribunals.gov.uk/</p>
16.4	Concern that scheme is a 'money making' scheme	<p>London boroughs have a legal duty under Section 16 of the Traffic Management Act 2004 to manage the road network with a view to ensuring the expeditious movement of traffic so far as is reasonably practicable and may take action to ensure the efficient and uncongested use of their road network.</p> <p>Parking and road traffic enforcement is a key tool to help manage driver behaviour on these roads. PCNs serve as an active deterrent that can help influence whether a driver will contravene the regulations that are in place for improving the safety and reliability of the borough road network.</p> <p>By law, net revenues from contraventions must be used for relevant transport and environmental purposes in London. Income also covers the cost of the enforcement operation.</p> <p>Boroughs use excess revenue to make improvements to their transport infrastructure and to pay for concessionary fares – the Freedom Pass.</p>
16.5	Concern over the lack of parking availability/ increase demand	<p>Parking restrictions are in place for the safety and reliability of the network for all motorists. We believe a higher PCN level will deter parking contraventions – including people overstaying – which cause disruption for other road users.</p>

16.6	Concern about the behaviour of delivery drivers	<p>London Councils recognises that some people have concerns about this issue. Parking and road traffic enforcement is a key tool to help manage driver behaviour whether they are driving for private or commercial purposes.</p> <p>PCNs serve as an active deterrent that can help influence whether a driver of any type will contravene the regulations that are in place for improving the safety and reliability of the borough road network.</p>
16.7	No change in dangerous/inconsiderate parking noticed	<p>Seven different types of dangerous and inconsiderate parking were referenced by respondents that answered this question.</p> <p>The existing regulatory framework has been designed in part to address inconsiderate and dangerous parking, so while these respondents may not have seen or experienced dangerous parking, it does happen.</p>
16.8	Increase in amount of parking on double yellow lines & zig zags	<p>London boroughs have a legal duty under Section 16 of the Traffic Management Act 2004 to manage the road network with a view to ensuring the expeditious movement of traffic so far as is reasonably practicable and may take action to ensure the efficient and uncongested use of their road network.</p> <p>In this context, PCNs serve as an active deterrent that can help influence whether a driver will contravene the regulations that are in place for improving the safety and reliability of the borough road network.</p>
16.9	Concern about parking near schools	See 16.8
16.10	Increase in the amount of pavement parking	See 16.8
16.11	Concern about parking on pavements	See 16.8
16.12	Suggestions for more enforcement	See 16.2
16.13	Other methods (not charging) should be considered to improve parking quality	<p>London Councils on behalf of member boroughs has been involved in the British Parking Association's Positive Parking Agenda programme:</p> <p>https://www.polisnetwork.eu/wp-content/uploads/2019/06/being-positive-about-parking-benefits-of-parking-management-in-london-andrew-luck.pdf</p>

		<p>London Councils also provides information to the public about how to park: https://www.londoncouncils.gov.uk/services/parking-services/how-park-your-car-london</p> <p>However, London Councils considers that improved information alone is insufficient to ensure the positive behaviours that parking and moving traffic regulations are designed to promote.</p> <p>In this context, PCNs serve as an active deterrent that can help influence whether a driver will contravene the regulations that are in place for improving the safety and reliability of the borough road network.</p>
16.14	General decrease in number of incidences	<p>The available data does not support this view. London Councils notes that there has been increase in the number of incidences. Since penalty levels were last reviewed, there has been an overall decline in compliance as evidenced by the number of PCNs issued.</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/enforcement-and-appeals-statistics</p>
16.15	Increase in certain locations	See 16.3
16.16	Concern about parking on corners	See 16.8
16.17	Concern about inconsiderate driving rather than parking	<p>London boroughs have a legal duty under Section 16 of the Traffic Management Act 2004 to manage the road network with a view to ensuring the expeditious movement of traffic so far as is reasonably practicable and may take action to ensure the efficient and uncongested use of their road network.</p> <p>However, the list of enforceable contraventions is limited. The police have powers to enforce against dangerous driving.</p>
16.18	Support to lower the charge/ penalty for parking illegally	<p>London Councils does not support this view. There has been increase in the number of incidences of contraventions. Since penalty levels were last reviewed, there has been an overall decline in compliance as evidenced by the number of PCNs issued.</p>

		<p>https://www.londoncouncils.gov.uk/services/parking-services/enforcement-and-appeals-statistics</p> <p>Penalties need to be set at a sufficient level to achieve legitimate public policy goals and encourage positive behaviour from motorists and the benefits that this has on congestion, road safety and air quality.</p> <p>London Councils proposes that the level of parking penalties should be increased to the following levels:</p> <ul style="list-style-type: none"> ○ Band A Higher Level = £160 ○ Band A Lower Level = £110 ○ Band B Higher Level = £140 ○ Band B Lower Level = £90 <p>London Councils also believes that the penalty charge for Bus Lane and Moving Traffic contraventions on borough roads be the same as the highest penalty charge for Parking in Band A = £160</p> <p>The restrictions are in place for the safety and reliability of the network. We believe a higher PCN level will deter parking, loading, bus lane and moving traffic contraventions which cause safety risks, disruption, and congestion for other road users.</p> <p>The current '<i>value</i>' of a higher-level penalty charge in London (which include bus lane and moving traffic PCNs) is 43.6% lower in '<i>real terms</i>' (or the '<i>comparative level</i>') than they were when last amended in 2011.</p> <p>The penalty level for lower-level parking contraventions, have not been amended since 2007. As a result, the current value of PCNs is 64.1% lower in real terms.</p>
16.19	General concern about negative impacts	<p>Boroughs use parking and moving traffic enforcement to improve compliance, not to penalise drivers. They actively promote the rules of their roads as well as</p>

		<p>ensuring that all on-street signage and infrastructure required to enforce the rules is fit for purpose.</p> <p>Signs and road markings on borough roads are there to inform drivers what they can and cannot do. To avoid being issued with a PCN, road users should ensure that they follow these signs and road markings.</p> <p>The rules for borough road networks are clearly explained in the latest edition of the Highway Code and are also explained on the London Councils website https://www.londoncouncils.gov.uk/services/parking-services/how-park-your-car-london</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/loading-and-unloading</p> <p>All PCNs include information about making a representation (challenging the PCN) to the issuing Authority and how long customers have got to do it. Representations can be made, online, in writing or via the phone service. Discounts are available for prompt payment.</p> <p>Following this stage, road users can appeal to the tribunal. More information, including escalation to London Tribunals can be found here: https://www.londontribunals.gov.uk/</p>
Question 16: Top 10 codes raised by Stakeholders		
16.20	General increase in number of incidences (non-specific)	See 16.1
16.21	Other – neutral	n/a
16.22	Concern over the lack of parking availability/ increase demand	See 16.5

16.23	Concern about the behaviour of delivery drivers	See 16.6			
16.24	Concern that scheme is a 'money making' scheme	See 16.4			
16.25	Other	n/a			
16.26	Increase in the amount of pavement parking	See 16.8			
16.27	No change in dangerous/inconsiderate parking noticed	See 16.14			
16.28	Support to lower the charge/ penalty for parking illegally	See 16.18			
16.29	Concern regarding confusion over the parking restrictions	See 16.13			
Question 17: Looking at possible changes to the Additional Parking Fees, do you think that these fees should... change by another amount (please specify).					
17.1	Support for decreasing the fees (no specified amount)	<p>London Councils does not support this view. The relevant fees have not been increased since 2007 during which time the Bank of England Inflation calculator suggests prices have risen by 64.1% (to September 2024)</p> <p>If the value of fees had kept pace with inflation, they would be as shown in the table below:</p> <table> <tr> <td>Additional Fees that <i>can</i> be associated to Parking Contraventions:</td><td>Current Amount:</td><td>Increase of 64.1% in line with Inflation since 2007 to September 2024</td></tr> </table>	Additional Fees that <i>can</i> be associated to Parking Contraventions:	Current Amount:	Increase of 64.1% in line with Inflation since 2007 to September 2024
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		2013 – 2014	40,226	1,656
		2014 – 2015	35,673	22
		2015 – 2016	35,722	6
		2016 – 2017	30,536	4
		2017 – 2018	26,657	9
		2018 – 2019	26,523	10
		2019 – 2020	24,427	3
		2020 – 2021	13,791	0
		2021 – 2022	20,924	112
		2022 – 2023	26,187	0
		2023 – 2024	26,196	15
		<p>In this context, an increase of fees is needed to maintain the viability of these operations, which form an important part of highways authorities enforcement operations.</p> <p>These operations support the London boroughs and the City of London Corporation’s legal duty under Section 16 of the Traffic Management Act 2004 to manage the road network with a view to ensuring the expeditious movement of traffic so far as is reasonably practicable and may take action to ensure the efficient and uncongested use of their road network.</p> <p>Nevertheless, taking into account respondents’ concerns about the level of charges, London Councils is proposing to raise fees to the following levels:</p>		
		Additional Fees that <i>can</i> be	Current Amount:	Proposed Amount

		associated to Parking Contraventions:			
		Release from Wheel Clamp	£70	£100 <i>(actual amount £100.52)</i>	
		Release from Car Pound	£200	£280 <i>(actual amount £287.20)</i>	
		Storage Fee	£40 per day	£55 per day <i>(actual amount £57.44)</i>	
		Disposal Fee	£70	£100 <i>(actual amount £100.52)</i>	
17.2	For all storage fees to be between £1-£50	See 17.1			
17.3	For all clamping fees to be between £1-£50	See 17.1			
17.4	For all disposal fees to be between £1-£50	See 17.1			
17.5	Concern the fees are too high	See 17.1			
17.6	Concern about impacts on cost of living/lower incomes	See 17.1			
17.7	Support for stopping the process of clamping	London Councils does not support this proposal. Clamping is now used very rarely and where it is used, it supports the highway authority's legal duty under Section 16 of the Traffic Management Act 2004 to manage the road network with a view to ensuring the expeditious movement of traffic so far as is reasonably practicable and may take action to ensure the efficient and uncongested use of their road network.			
17.8	For all removal fees to be between £1-£50	See 17.1			

17.9	Suggestion for fees to rise above levels of inflation	See 17.1
17.10	Support for increasing the fees (no amount specified)	See 17.1
17.11	Comment out of scope	n/a
17.12	For all clamping fees to be between £51-£100	See 17.1
17.13	For all removal fees to be between £51-£100	See 17.1
17.14	For all disposal fees to be between £51-£100	See 17.1
17.15	Concern that fees are 'money making' scheme	London Councils believes that the evidence provided in 17.1 disproves this statement.
17.16	Concern about impacts on motorists (inc. anti-motorist)	<p>The restrictions are in place for the safety and reliability of the network for all motorists. Clamping, removal, storage and release of vehicles that impacted authorities' ability to manage the network effectively has a positive impact for motorists that follow the rules.</p> <p>We believe higher fees will better allow authorities to undertake this work and cover the cost of doing so. In turn this will allow them to tackle parking, loading, bus lane and moving traffic contraventions which cause safety risks, disruption, and congestion for other road users.</p> <p>Ninety-five per cent of the road network in London is managed by the boroughs, and with around two billion car journeys made each year, parking and traffic management is integral to maintain the movement of traffic and safety of all road users. In this context enforcement is for the benefit of motorists who comply with the regulations. Any changes to penalty charges will only impact the minority of motorists who do not comply with the regulations.</p>
17.16	Support for fees to remain the same	See 17.1
17.17	Support for no fees	See 17.1

17.18	For all fees to double	See 17.1
Question 17: Top 10 codes raised by Stakeholders		
17.20	In support of the additional parking fees but opposed any increase, suggesting a decrease instead (by no specified amount)	See 17.1
17.21	Support for fees to remain the same	See 17.1
17.22	For all clamping fees to be between £101-£200	See 17.1
17.23	Suggestion for fees to be priced to cover cost of admin/ enforcement	See 17.1
17.24	Support for increasing the fees (no amount specified)	See 17.1
17.25	Support for the fees to be high to act as a deterrent (amount unspecified)	See 17.1
17.26	Support for decreasing the fee (no amount specified)	See 17.1
17.27	For all clamping fees to be between £1-£50	See 17.1
17.28	Support for fee to remain the same	See 17.1
17.29	For all removal fees to be between £51-£100	See 17.1

Question 18: What would be the impact on you if the above fees were to increase?		
18.1	Not impacted by the increase in charge (general)	n/a
18.2	Concern about affordability/impact of cost	<p>These are avoidable costs and cost is only a consideration in respect of vehicles parked in contravention, as they are the only ones that will attract charges. Therefore, the way to avoid cost is to follow the regulations. Moreover, the numbers of vehicles being removed or clamped is very small proportion of the total in London.</p> <p>When considering whether a cost increase is justified, London Councils has to weigh up the impact of the cost of increasing the charges to the small number of motorists affected against the wider impact on the transport network and to other road users of not undertaking the activity.</p> <p>London boroughs have a legal duty under Section 16 of the Traffic Management Act 2004 to manage the road network with a view to ensuring the expeditious movement of traffic so far as is reasonably practicable and may take action to ensure the efficient and uncongested use of their road network.</p> <p>Removal, clamping, storage and release are important aspects of network management. As the real terms value of fees has decreased over time (see 18.7 below) the income raised in fees has become insufficient to cover the cost of the activity.</p> <p>London Councils considers that the benefits of increasing the fees outweigh the financial impact on tiny fraction of motorists who have to pay them.</p>
18.3	Not impacted due to compliance/only impact those who do not comply	London Councils supports this view.

18.4	Concern about impacts on cost of living and high inflation	See 18.2															
18.5	Support acting as a greater deterrent and/or increased compliance	See 18.2															
18.6	Support a reduction in illegal/dangerous parking	See 18.2															
18.7	Concern that initiative is a ‘money making’ scheme	<p>London Councils does not support this view. The relevant fees have not been increased since 2007 during which time the Bank of England Inflation calculator suggests prices have risen by 64.1% (to September 2024)</p> <p>If the value of fees had kept pace with inflation, they would be as shown in the table below:</p> <table> <tr> <th>Additional Fees that <i>can</i> be associated to Parking Contraventions:</th><th>Current Amount:</th><th>Increase of 64.1% in line with Inflation since 2007 to September 2024</th></tr> <tr> <td>Release from Wheel Clamp</td><td>£70</td><td>£115 <i>(actual amount £114.87)</i></td></tr> <tr> <td>Release from Car Pound</td><td>£200</td><td>£330 <i>(actual amount £328.20)</i></td></tr> <tr> <td>Storage Fee</td><td>£40 per day</td><td>£65 per day <i>(actual amount £65.64)</i></td></tr> <tr> <td>Disposal Fee</td><td>£70</td><td>£115 <i>(actual amount £114.87)</i></td></tr> </table>	Additional Fees that <i>can</i> be associated to Parking Contraventions:	Current Amount:	Increase of 64.1% in line with Inflation since 2007 to September 2024	Release from Wheel Clamp	£70	£115 <i>(actual amount £114.87)</i>	Release from Car Pound	£200	£330 <i>(actual amount £328.20)</i>	Storage Fee	£40 per day	£65 per day <i>(actual amount £65.64)</i>	Disposal Fee	£70	£115 <i>(actual amount £114.87)</i>
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Our member authorities have indicated that operational costs associated with the removal of vehicles, such as a car pound, cashiers, removal lorries and back-office processes have increased to such an extent that they are no longer covered by the charges levied.

This has lead to a reduction in the amount of activity in removals and clamping.

Year	Removals	Clamping
2007 - 2008	87,770	48,753
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		2021 – 2022	20,924	112
		2022 – 2023	26,187	0
		2023 – 2024	26,196	15
		<p>In this context, an increase of fees is needed to maintain the viability of these operations, which form an important part of highways authorities enforcement operations.</p> <p>These operations support the London boroughs and the City of London Corporation's legal duty under Section 16 of the Traffic Management Act 2004 to manage the road network with a view to ensuring the expeditious movement of traffic so far as is reasonably practicable and may take action to ensure the efficient and uncongested use of their road network.</p> <p>Nevertheless, taking into account respondents' concerns about the level of charges, London Councils is proposing to raise fees to the following levels:</p>		
		Additional Fees that can be associated to Parking Contraventions:	Current Amount:	Proposed Amount
		Release from Wheel Clamp	£70	£100 <i>(actual amount £100.52)</i>
		Release from Car Pound	£200	£280 <i>(actual amount £287.20)</i>
		Storage Fee	£40 per day	£55 per day <i>(actual amount £57.44)</i>

		Disposal Fee	£70	£100 (actual amount £100.52)	
18.8	Concern about unfairly punishing a mistake/ unavoidable situation	<p>Boroughs use parking and moving traffic enforcement to improve compliance, not to penalise drivers. They actively promote the rules of their roads as well as ensuring that all on-street signage and infrastructure required to enforce the rules is fit for purpose.</p> <p>Signs and road markings on borough roads are there to inform drivers what they can and cannot do. To avoid being issued with a PCN, road users should ensure that they follow these signs and road markings.</p> <p>The rules for borough road networks are clearly explained in the latest edition of the Highway Code and are also explained on the London Councils website https://www.londoncouncils.gov.uk/services/parking-services/how-park-your-car-london</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/loading-and-unloading</p> <p>All PCNs include information about making a representation (challenging the PCN) to the issuing Authority and how long customers have got to do it. Representations can be made, online, in writing or via the phone service. Discounts are available for prompt payment.</p> <p>Following this stage, road users can appeal to the tribunal. More information, including escalation to London Tribunals can be found here: https://www.londontribunals.gov.uk/</p>			
18.9	Suggestion that main impact is an increased cost	See 18.2			
18.10	General opposition to increased fees	See 18.2			
18.11	Support improved road safety	See 18.2			
18.12	Concern about reduced quality of life	See 18.2			

18.13	Concern that fees are already too high	See 18.2
18.14	Concern about discouraging people from driving to/visiting London	See 18.2 and note that London Councils does not consider that the perception that someone might have to pay marginally higher clamping, storage, disposal or release fees is a significant deterrent for people to drive or visit London given that there are c. 2 billion car journeys a year in the capital.
18.15	Concern about impact on vulnerable groups (i.e. elderly, disabled)	See 18.2 – respondents did not provide any evidence that these groups would be disproportionately affected by any increases to the fees. London Councils also notes that provisions exist to make parking easier for disabled people through the Blue Badge scheme.
18.16	Support for recovering costs to councils to manage services	See 18.2 and 18.7
18.17	Impact of discouraging people avoiding driving in the areas affected	See 18.2 and 18.7
18.18	Support for positive impacts on sustainable modes	See 18.2 and 18.7
18.19	Concern about having to recover vehicle	See 18.2 and 18.7
18.20	Concern that raising fees is unfair	See 18.2 and 18.7
Question 18: Top 10 codes raised by Stakeholders		
18.21	Support acting as a greater deterrent and/or increased compliance	See 18.2 and 18.7
18.22	Support for recovering costs to councils to manage services	See 18.2 and 18.7
18.23	Not impacted by the increase in charge (general)	n/a

18.24	Support a reduction in illegal/dangerous parking	See 18.2 and 18.7
18.25	Concern about impacts on businesses	<p>London Councils does not consider that an increase in fees will have a significant negative impact on businesses. Parking and road traffic enforcement is a key tool to help manage driver behaviour whether they are driving for private or commercial purposes.</p> <p>PCNs serve as an active deterrent that can help influence whether a driver of any type will contravene the regulations that are in place for improving the safety and reliability of the borough road network.</p> <p>Moreover parking and traffic management is an effective way of ensuring that town centres and other commercial areas are accessible. In this context, the proposals are beneficial for business that rely on being accessible.</p>
18.26	Concern about costs being passed on to businesses/residents	See 18.25
18.27	Support improved road safety	See 18.2 and 18.7
18.28	Concern about affordability/impact of cost	See 18.2 and 18.7
18.29	Support improved administration/enforcement of fees	See 18.2 and 18.7
18.30	Concern about impacts on motorists (general)	See 18.2 and 18.7
Question 19: Are you concerned about the level of non-compliance of bus lane and moving traffic regulations in London?		
	This question did not include a free text option for further comment.	

Question 20: Should the penalty charges for bus lane and moving traffic contraventions on borough roads continue to be set at the same amount as each other (currently, both set at £130)?

20.1	Support to lower all charges	<p>The restrictions are in place for the safety and reliability of the network. We believe a higher PCN level will deter parking, loading, bus lane and moving traffic contraventions which cause safety risks, disruption, and congestion for other road users.</p> <p>The current '<i>value</i>' of a higher-level penalty charge in London (which include bus lane and moving traffic PCNs) is 43.6% lower in '<i>real terms</i>' (or the '<i>comparative level</i>') than they were when last amended in 2011.</p> <p>Since penalty levels were last reviewed, there has been an overall decline in compliance. See:</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/enforcement-and-appeals-statistics</p> <p>While London Councils notes that there has been a greater degree of fluctuation in the numbers of bus lane penalties over the period, overall there has been an increase. Moreover, London Councils notes the need for consistency in penalty rates for higher level contraventions.</p> <p>London Councils proposes that the level of Band A parking, bus lane and moving traffic penalties should be consistent and increased to the following levels: £160</p> <p>Penalties need to be set at a sufficient level to achieve legitimate public policy goals and encourage positive behaviour from motorists and the benefits that this has on congestion, road safety and air quality.</p> <p>Reducing the penalty level would have a detrimental effect on levels of compliance and achievement of public policy goals.</p>
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20.2	Concern users are penalised for accidents and mistakes	<p>Boroughs use parking and moving traffic enforcement to improve compliance, not to penalise drivers. They actively promote the rules of their roads as well as ensuring that all on-street signage and infrastructure required to enforce the rules is fit for purpose.</p> <p>Signs and road markings on borough roads are there to inform drivers what they can and cannot do. To avoid being issued with a PCN, road users should ensure that they follow these signs and road markings.</p> <p>The rules for borough road networks are clearly explained in the latest edition of the Highway Code and are also explained on the London Councils website https://www.londoncouncils.gov.uk/services/parking-services/how-park-your-car-london</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/loading-and-unloading</p> <p>All PCNs include information about making a representation (challenging the PCN) to the issuing Authority and how long customers have got to do it. Representations can be made, online, in writing or via the phone service. Discounts are available for prompt payment.</p> <p>Following this stage, road users can appeal to the tribunal. More information, including escalation to London Tribunals can be found here: https://www.londontribunals.gov.uk/</p>
20.3	From £1 to £50	See 20.1
20.4	From £51 up to £100	See 20.1
20.5	General support for increase to bus lane penalty charges (unspecified amount)	See 20.1
20.6	Suggestion for charges to differ for different contraventions	See 20.1

20.7	Support for charges to remain the same	See 20.1
20.8	Suggestion that there should be no charges at all	See 20.1
20.9	General support for an increase to all charges	See 20.1
20.10	Concern accidental contraventions happen due to unclear bus lane markings	See 20.1 see also 141 'Bus Lanes' of the highway code Multi-lane carriageways (133 to 143) - THE HIGHWAY CODE
20.11	Concern accidental contraventions happen because yellow box rules are unclear	London Councils does not consider that this is a relevant factor and notes that yellow box rules are set out in the highway code (see 174 at https://www.highwaycodeuk.co.uk/road-junctions.html)
20.12	Concern the charges are too high	See 20.1
20.13	More than £200	See 20.1
20.14	Charges for moving traffic and bus lane contraventions should be the same value	See 20.1
20.15	Suggestion to increase charges for repeat offenders	London Councils is supportive of making it easier for authorities to deal with repeat offenders / persistent evaders but note that this is outside the scope of this consultation.
20.16	Suggestion for charges to be in line with the severity of offence	See 20.1
20.17	From £101 up to £200	See 20.1
20.18	Concern it is an anti-motorist initiative	See 20.1
20.19	£0	See 20.1
20.20	Other	See 20.1

Question 20: Top 10 codes raised by Stakeholders		
20.21	General support for increase to bus lane penalty charges (unspecified amount)	See 20.1
20.22	Concern users are penalised for accidents and mistakes (not deliberate)	See 20.2
20.23	Support for no charges at all	See 20.1
20.24	General support for an increase to all charges	See 20.1
20.25	Support to lower all charges	See 20.1
20.26	From £1 to £50	See 20.1
20.27	Concern accidental contraventions happen due to unclear road markings / signs	See 20.10 and 20.11
20.28	Charges for moving traffic and bus lane contraventions should be the same value	See 20.1
20.29	Suggestion for charges to differ for different contraventions	See 20.1
20.30	Suggestion to increase charges for intentional offences	London Councils does not support this recommendation because of the difficulty in proving intent.

Question 21: Should Band A (Higher) parking, bus lane and moving traffic penalty charges be the same as each other?

21.1	Support to lower all charges	<p>London Councils does not support this view. There has been increase in the number of incidences of contraventions. Since penalty levels were last reviewed, there has been an overall decline in compliance as evidenced by the number of PCNs issued.</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/enforcement-and-appeals-statistics</p> <p>Penalties need to be set at a sufficient level to achieve legitimate public policy goals and encourage positive behaviour from motorists and the benefits that this has on congestion, road safety and air quality.</p> <p>London Councils proposes that the level of Band A parking, bus lane and moving traffic penalties should be consistent and increased to the following levels: £160</p> <p>The restrictions are in place for the safety and reliability of the network. We believe a higher PCN level will deter parking, loading, bus lane and moving traffic contraventions which cause safety risks, disruption, and congestion for other road users.</p> <p>The current '<i>value</i>' of a higher-level penalty charge in London (which include bus lane and moving traffic PCNs) is 43.6% lower in '<i>real terms</i>' (or the '<i>comparative level</i>') than they were when last amended in 2011.</p> <p>The penalty level for lower-level parking contraventions, have not been amended since 2007. As a result, the current value of PCNs is 64.1% lower in real terms.</p>
21.2	Up to £50	See 21.1
21.3	From £51 up to £100	See 21.1

21.4	Concern about unfairness punishing a mistake/unavoidable situation	<p>Boroughs use parking and moving traffic enforcement to improve compliance, not to penalise drivers. They actively promote the rules of their roads as well as ensuring that all on-street signage and infrastructure required to enforce the rules is fit for purpose.</p> <p>Signs and road markings on borough roads are there to inform drivers what they can and cannot do. To avoid being issued with a PCN, road users should ensure that they follow these signs and road markings.</p> <p>The rules for borough road networks are clearly explained in the latest edition of the Highway Code and are also explained on the London Councils website https://www.londoncouncils.gov.uk/services/parking-services/how-park-your-car-london</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/loading-and-unloading</p> <p>All PCNs include information about making a representation (challenging the PCN) to the issuing Authority and how long customers have got to do it. Representations can be made, online, in writing or via the phone service. Discounts are available for prompt payment.</p> <p>Following this stage, road users can appeal to the tribunal. More information, including escalation to London Tribunals can be found here: https://www.londontribunals.gov.uk/</p>
21.5	Support for increased charges	See 21.1
21.6	Support for charges to remain the same	See 21.1
21.7	Suggestion for charges to be in line with the severity of offence	See 21.1
21.8	Support for increased charge on bus lanes (no amount specified)	See 21.1

21.9	Support for pricing to be at Band B	See 21.1
21.10	Stakeholder Response	See 21.1
21.11	Concern accidental contraventions happen due to unclear road markings/signs	<p>See 21.4 see also 141 'Bus Lanes' of the highway code Multi-lane carriageways (133 to 143) - THE HIGHWAY CODE</p> <p>London Councils does not consider that this is a relevant factor and notes that yellow box rules are set out in the highway code (see 174 at https://www.highwaycodeuk.co.uk/road-junctions.html)</p>
21.12	From £101 up to £200	See 21.1
21.13	Concern charges are high enough already	See 21.1
21.14	Support for lower charges on bus lanes and moving contraventions	See 21.1
21.15	Suggestion that there should be no charges at all	See 21.1
21.16	Concern it is a 'money making' scheme	<p>London boroughs have a legal duty under Section 16 of the Traffic Management Act 2004 to manage the road network with a view to ensuring the expeditious movement of traffic so far as is reasonably practicable and may take action to ensure the efficient and uncongested use of their road network.</p> <p>Parking and road traffic enforcement is a key tool to help manage driver behaviour on these roads. PCNs serve as an active deterrent that can help influence whether a driver will contravene the regulations that are in place for improving the safety and reliability of the borough road network.</p> <p>By law, net revenues from contraventions must be used for relevant transport and environmental purposes in London. Income also covers the cost of the enforcement operation.</p> <p>Boroughs use excess revenue to make improvements to their transport infrastructure and to pay for concessionary fares – the Freedom Pass.</p>
21.17	More than £200	See 21.1

21.18	Concern about impacts on cost of living and high inflation	<p>Penalties can be avoided by complying with relevant parking and traffic regulations. The increase in the PCN level will only impact drivers that contravene the rules for parking on borough roads.</p> <p>The restrictions are in place for the safety and reliability of the network. We believe a higher PCN level will deter dangerous and inconsiderate parking behaviours which cause safety risks, disruption, and congestion for other road users.</p> <p>Boroughs use parking and moving traffic enforcement to improve compliance, not to penalise drivers. They actively promote the rules of their roads as well as ensuring that all on-street signage and infrastructure required to enforce the rules is fit for purpose.</p> <p>Signs and road markings on borough roads are there to inform drivers what they can and cannot do. To avoid being issued with a PCN, road users should ensure that they follow these signs and road markings.</p> <p>The rules for borough road networks are clearly explained in the latest edition of the Highway Code and are also explained on the London Councils website https://www.londoncouncils.gov.uk/services/parking-services/how-park-your-car-london</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/loading-and-unloading</p> <p>All PCNs include information about making a representation (challenging the PCN) to the issuing Authority and how long customers have got to do it. Representations can be made, online, in writing or via the phone service. Discounts are available for prompt payment.</p> <p>Following this stage, road users can appeal to the tribunal. More information, including escalation to London Tribunals can be found here: https://www.londontribunals.gov.uk/</p>
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21.19	Suggestion to increase charges for intentional offences	London Councils does not support this recommendation because of the difficulty in proving intent.
21.20	Support for higher charges on moving contraventions	See 21.1
Question 21: Top 10 codes raised by Stakeholders		
21.21	Support for increased charges	See 21.1
21.22	Support to lower all charges	See 21.1
21.23	From £51 up to £100	See 21.1
21.24	Suggestion to increase charges for repeat offenders	London Councils is supportive of making it easier for authorities to deal with repeat offenders / persistent evaders but note that this is outside the scope of this consultation.
21.25	Support for increased charge on bus lanes (no amount specified)	See 21.1
21.26	Support for charges to remain the same	See 21.1
21.27	Support for pricing to be at Band B	See 21.1
21.28	Concern about unfairness punishing a mistake/ unavoidable situation	See 21.4
21.29	Concern accidental contraventions happen due to unclear road markings / signs	See 21.11
21.30	Concern motorists are unfairly targeted	The restrictions are in place for the safety and reliability of the network for all motorists. We believe a higher PCN level will deter parking, loading, bus lane and moving traffic contraventions which cause safety risks, disruption, and

		<p>congestion for other road users.</p> <p>Ninety-five per cent of the road network in London is managed by the boroughs, and with around two billion car journeys made each year, parking and traffic management is integral to maintain the movement of traffic and safety of all road users. In this context enforcement is for the benefit of motorists who comply with the regulations. Any changes to penalty charges will only impact the minority of motorists who do not comply with the regulations.</p> <p>Any form of enforcement that involves penalties, is meant to act as a deterrent, encourage positive behaviour change and increase compliance. Therefore, the PCNs must be set at a level that makes the borough road networks safer, for all London residents and visitors.</p>
<p>Question 22 : What would be the impact on you if the penalty charges for bus lane and moving traffic contraventions were to increase?</p>		
22.1	Not impacted by the increase in charge (general)	n/a
22.2	Concern about affordability/impact of cost	<p>Penalties can be avoided by complying with relevant parking and moving traffic restrictions. The increase in the PCN level will only impact drivers that contravene the rules for parking, loading, bus lane and moving traffic contraventions on borough roads.</p> <p>The restrictions are in place for the safety and reliability of the network. We believe a higher PCN level will deter parking, loading, bus lane and moving traffic contraventions which cause safety risks, disruption, and congestion for other road users.</p> <p>Boroughs use parking and moving traffic enforcement to improve compliance, not to penalise drivers. They actively promote the rules of their roads as well as</p>

		<p>ensuring that all on-street signage and infrastructure required to enforce the rules is fit for purpose.</p> <p>Signs and road markings on borough roads are there to inform drivers what they can and cannot do. To avoid being issued with a PCN, road users should ensure that they follow these signs and road markings.</p> <p>The rules for borough road networks are clearly explained in the latest edition of the Highway Code and are also explained on the London Councils website https://www.londoncouncils.gov.uk/services/parking-services/how-park-your-car-london</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/loading-and-unloading</p> <p>All PCNs include information about making a representation (challenging the PCN) to the issuing Authority and how long customers have got to do it. Representations can be made, online, in writing or via the phone service. Discounts are available for prompt payment.</p> <p>Motorists who accept liability for a contravention and do not wish to challenge a PCN, have the option to pay it within 14 days to get a 50% discount.</p> <p>There are also mitigations in place that can help alleviate the cost of non-compliance to motorists, that provide them with the opportunity to challenge a PCN if they feel that it was unfairly issued.</p> <p>Following this stage, road users can appeal to the tribunal. More information, including escalation to London Tribunals can be found here: https://www.londontribunals.gov.uk/</p>
22.3	Concern about unfairly punishing a mistake/unavoidable situation	<p>Boroughs use parking and moving traffic enforcement to improve compliance, not to penalise drivers. They actively promote the rules of their roads as well as ensuring that all on-street signage and infrastructure required to enforce the rules is fit for purpose.</p>

		<p>Signs and road markings on borough roads are there to inform drivers what they can and cannot do. To avoid being issued with a PCN, road users should ensure that they follow these signs and road markings.</p> <p>The rules for borough road networks are clearly explained in the latest edition of the Highway Code and are also explained on the London Councils website https://www.londoncouncils.gov.uk/services/parking-services/how-park-your-car-london</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/loading-and-unloading</p> <p>All PCNs include information about making a representation (challenging the PCN) to the issuing Authority and how long customers have got to do it. Representations can be made, online, in writing or via the phone service. Discounts are available for prompt payment.</p> <p>Following this stage, road users can appeal to the tribunal. More information, including escalation to London Tribunals can be found here: https://www.londontribunals.gov.uk/</p>
22.4	Support given potential improvement to journey times	<p>London Councils agrees with this position.</p> <p>Ninety-five per cent of the road network in London is managed by the boroughs, and with around two billion car journeys made each year, parking and traffic management is integral to maintain the movement of traffic and safety of all road users. Any form of enforcement that involves penalties, is meant to act as a deterrent, encourage positive behaviour change and increase compliance.</p> <p>Therefore, the PCNs must be set at a level that act as a deterrent and increase compliance levels. This in turn improves the safety for all road users, reduces congestion, improves air quality and journey times as more obstructions to free-flowing traffic would decrease.</p>

		<p>In addition, enforcement helps to improve air quality and promotes active travel and modal shift, as the experience of walking and cycling becomes more viable option in a pleasant and safe environment.</p> <p>This supports the long-term objectives within the Mayor's Transport Strategy, which is adopted by the boroughs as part of their own Transport Strategies.</p>
22.5	Not impacted due to compliance/only impact those who do not comply	London Councils agrees with this position and notes response provided in 22.1
22.6	Support acting as a greater deterrent and/or increased compliance	London Councils agrees with this position and notes responses provided in 22.2 and 22.4
22.7	Concern about impacts on cost of living and high inflation	See 2.2
22.8	Support improved road safety for cyclists/pedestrians	London Councils agrees with this position and notes responses provided in 22.4
22.9	Concern it is a 'money making' scheme	<p>London boroughs have a legal duty under Section 16 of the Traffic Management Act 2004 to manage the road network with a view to ensuring the expeditious movement of traffic so far as is reasonably practicable and may take action to ensure the efficient and uncongested use of their road network.</p> <p>Parking and road traffic enforcement is a key tool to help manage motorists' behaviour on these roads. PCNs serve as an active deterrent that can help influence whether a motorist will contravene the regulations that are in place for improving the safety and reliability of the borough road network.</p> <p>By law, net revenues from contraventions must be used for relevant transport and environmental purposes in London. Income also covers the cost of the enforcement operation.</p> <p>Boroughs use any surplus revenue to make improvements to their transport</p>

		<p>infrastructure and to pay for concessionary fares – the Freedom Pass.</p> <p>The restrictions are in place for the safety and reliability of the network for all motorists. We believe a surcharge rate of 50% will deter parking, loading, bus lane and moving traffic contraventions which cause safety risks, disruption, and congestion for other road users and encourage early payment of a PCN to avoid any such increase.</p> <p>See also 22.2</p>
22.10	Concern about the reduced levels of income from fines	See 22.2
22.11	General concern about negative impacts	See 22.2, 22.4, and 22.9
22.12	Support improved congestion levels for drivers	London Councils agrees with this position and notes response provided in 22.4
22.13	Concern about lack of adequate marking/signage	See 22.2
22.14	Concern motorists are unfairly targeted	See 22.2 and 22.3
22.15	Concern about increased stress/anxiety over the risk of incurring fines	See 22.2
22.16	Support a reduction in dangerous driving	<p>London boroughs have a legal duty under Section 16 of the Traffic Management Act 2004 to manage the road network with a view to ensuring the expeditious movement of traffic so far as is reasonably practicable and may take action to ensure the efficient and uncongested use of their road network.</p> <p>However, the list of enforceable contraventions is limited. The police have powers to enforce against dangerous driving.</p>
22.17	Concern charges will discourage people from driving to/visiting London/living in London	See 22.2
22.18	Concern about reduced quality of life	See 22.4

22.19	General opposition about governance from local councils/London	See 22.9
22.20	Concern the current penalty is high enough	<p>London Councils disagrees and proposes that the level of bus lane and moving traffic penalties should be increased to £160, the same as the highest penalty charge for Parking in Band A and the same as TfL.</p> <p>The restrictions are in place for the safety and reliability of the network. We believe a higher PCN level bus lane and moving traffic contraventions which cause safety risks, disruption, and congestion for other road users.</p> <p>The current '<i>value</i>' of a higher-level penalty charge in London (which include bus lane and moving traffic PCNs) is 43.6% lower in '<i>real terms</i>' (or the '<i>comparative level</i>') than they were when last amended in 2011.</p> <p>Since penalty levels were last reviewed, there has been an overall decline in compliance. See:</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/enforcement-and-appeals-statistics</p> <p>Penalties need to be set at a sufficient level to achieve legitimate public policy goals and encourage positive behaviour from motorists and the benefits that this has on congestion, road safety and air quality.</p>
Question 22: Top 10 codes raised by Stakeholders		
22.21	Support acting as a greater deterrent and/or increased compliance	22.4 and 22.20
22.22	Concern about affordability/impact of cost	See 22.2
22.23	Support given potential improvement to journey times	See 22.4

22.24	Concern about impact on businesses	<p>See 22.2 and 22.4</p> <p>London Councils does not consider that an increase in fees will have a significant negative impact on businesses. Road traffic enforcement is a key tool to help manage driver behaviour whether they are driving for private or commercial purposes.</p> <p>PCNs serve as an active deterrent that can help influence whether a driver of any type will contravene the regulations that are in place for improving the safety and reliability of the borough road network.</p> <p>Moreover traffic management is an effective way of ensuring that town centres and other commercial areas are accessible. In this context, the proposals are beneficial for business that rely on being accessible.</p>
22.25	Not impacted by the increase in charge (general)	n/a
22.26	Support a reduction in dangerous driving	See 22.16
22.27	Concern about unfairly punishing a mistake/unavoidable situation	See 22.3
22.28	Support for recovering costs to councils to manage services	See 22.9
22.29	Support improved road safety for cyclists/walkers	See 22.4
22.30	Support improved congestion levels for drivers	See 22.4
<p>Question 23: Do you think that the discount rate for early payment should remain at 50%?</p>		
	This question did not include a free text option for further comment.	

Question 24: If you selected ‘ No’ to any of the options above, please specify below how much you think the discount rate should be?

24.1	Specified Percentage for Discount From 21% to 40%	<p>Under the provisions set out in the Traffic Management Act 2004 (Schedule 9), which repealed similar provisions in the Road Traffic Act 1991, London Councils’ Transport and Environment Committee (TEC) is responsible, subject to agreement by the Mayor of London and possible veto (refusal) of the Secretary of State (SoS), for setting parking and traffic enforcement charges on borough roads.</p> <p>These parking enforcement charges, and additional fees include setting the discount percentage rate.</p> <p>A discount of 50% is often applied to other penalty charges and fines issued to individuals if they pay within a certain time issued for a Fixed Penalty Notices (FPNs) for a wide range of environmental and highways offences, as well as traffic and motoring offences.</p> <p>London Councils does not support the view of offering an alternative discount to the current rate. A 50% decrease is a fair and consistent reduction for early payment of PCN, as is a 50% surcharge for late payment (see also the points raised in question 26 below).</p> <p>A 50% decrease of a penalty charge that is paid within 14 days from the date it was issued is consistent with TfL’s decision not to seek a change to their discount rates in 2022.</p> <p>Penalties can be avoided by complying with the relevant parking and traffic regulations. A PCN will only impact drivers that contravene the rules for parking and traffic on borough roads. We believe that maintaining a discount rate of 50% will encourage early payment and deter the motorist from future dangerous and inconsiderate parking behaviours which cause safety risks, disruption, and congestion for other road users.</p>
24.2	Specified Percentage for Discount From 41% to 60%	See 24.1

24.3	Specified Percentage for Discount From 1% to 20%	See 24.1
24.4	Specified Percentage for Discount From 68% to 99%	See 24.1
24.5	Support for no discount at all	See 24.1
24.6	Support for a sliding scale of discounts based on time	See 24.1 in addition, London Councils does not support this proposal as it could potentially be difficult to administer and confusing to communicate to the public.
24.7	Concern about affordability/ impact of cost	<p>Penalties can be avoided by complying with relevant parking and traffic regulations and a PCN will only impact drivers that contravene the rules for parking and traffic on borough roads.</p> <p>A discount of 50% reduces the cost of a PCN and lessens the financial impact on drivers that contravene the rules for parking and traffic on borough roads and encourages early payment and deter the motorist from future dangerous and inconsiderate parking behaviours which cause safety risks, disruption, and congestion for other road users.</p> <p>Boroughs use parking and moving traffic enforcement to improve compliance, not to penalise drivers. They actively promote the rules of their roads as well as ensuring that all on-street signage and infrastructure required to enforce the rules is fit for purpose.</p> <p>Signs and road markings on borough roads are there to inform drivers what they can and cannot do. To avoid being issued with a PCN, road users should ensure that they follow these signs and road markings.</p> <p>The rules for borough road networks are clearly explained in the latest edition of the Highway Code and are also explained on the London Councils website https://www.londoncouncils.gov.uk/services/parking-services/how-park-your-car-london</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/loading-and-unloading</p> <p>All PCNs include information about making a representation (challenging the</p>

		<p>PCN) to the issuing Authority and how long customers have got to do it. Representations can be made, online, in writing or via the phone service. Discounts are available for prompt payment.</p> <p>Following this stage, road users can appeal to the tribunal. More information, including escalation to London Tribunals can be found here: https://www.londontribunals.gov.uk/</p> <p>See also 24.1</p>															
24.8	Suggestion to increase the discount for payments made in under 7 days	See 24.1 and 24.6 Note also that the discount period is set in legislation.															
24.9	Support for discount to encourage payment	See 24.1 and 24.7															
24.10	Support acting as a greater deterrent and/or increased compliance	See 24.1 and 24.7															
24.11	Specified Value of Discount From £1 to £30	<p>PCNs are set at different levels depending on the Band and whether it is a higher or lower penalty charge, and London Councils believes that by applying a general rule of a 50% discount on all PCNs paid within 14 days is the fairest and consistent rate as opposed to decreasing it by a fixed value.</p> <p>By applying a ‘fixed’ value rather than a percentage, this will have a disproportionate impact on those who receive a lower level PCN than those who receive a higher level PCN.</p> <p>E.g. Using £30 value as the maximum suggested discount rate increase against the current PCN levels in place:</p> <table><tr><th>Penalty Charge Levels</th><th>Band A (Higher)</th><th>Band A (Lower)</th><th>Band B (Higher)</th><th>Band B (Lower)</th></tr><tr><td>Current Amounts</td><td>£130</td><td>£80</td><td>£110</td><td>£60</td></tr><tr><td>Current Discount Rate at 50%</td><td>£65</td><td>£40</td><td>£55</td><td>£30</td></tr></table>	Penalty Charge Levels	Band A (Higher)	Band A (Lower)	Band B (Higher)	Band B (Lower)	Current Amounts	£130	£80	£110	£60	Current Discount Rate at 50%	£65	£40	£55	£30
Penalty Charge Levels	Band A (Higher)	Band A (Lower)	Band B (Higher)	Band B (Lower)													
Current Amounts	£130	£80	£110	£60													
Current Discount Rate at 50%	£65	£40	£55	£30													

		<table><tr><td>Suggested Maximum of £30 Discount</td><td>£100</td><td>£50</td><td>£80</td><td>£30</td></tr><tr><td>Difference</td><td>Pay £35 more</td><td>Pay £10 more</td><td>Pay £25 more</td><td>Pay the same £0</td></tr></table> <p>London boroughs have a legal duty under Section 16 of the Traffic Management Act 2004 to manage the road network with a view to ensuring the expeditious movement of traffic so far as is reasonably practicable and may take action to ensure the efficient and uncongested use of their road network.</p> <p>Parking and road traffic enforcement is a key tool to help manage motorists’ behaviour on these roads. PCNs serve as an active deterrent that can help influence whether a motorist will contravene the regulations that are in place for improving the safety and reliability of the borough road network.</p> <p>By law, net revenues from contraventions must be used for relevant transport and environmental purposes in London. Income also covers the cost of the enforcement operation.</p> <p>Boroughs use any surplus revenue to make improvements to their transport infrastructure and to pay for concessionary fares – the Freedom Pass.</p>	Suggested Maximum of £30 Discount	£100	£50	£80	£30	Difference	Pay £35 more	Pay £10 more	Pay £25 more	Pay the same £0
Suggested Maximum of £30 Discount	£100	£50	£80	£30								
Difference	Pay £35 more	Pay £10 more	Pay £25 more	Pay the same £0								
24.12	Specified Percentage for Decrease to 0%	See 24.1										
24.13	Specified Percentage for Decrease to 100%	See 24.1										
24.14	Concern the discounts encourage continued poor behaviour	<p>London boroughs have a legal duty under Section 16 of the Traffic Management Act 2004 to manage the road network with a view to ensuring the expeditious movement of traffic so far as is reasonably practicable and may take action to ensure the efficient and uncongested use of their road network.</p> <p>Parking and road traffic enforcement is a key tool to help manage motorists’ behaviour on these roads. PCNs serve as an active deterrent that can help influence whether a motorist will contravene the regulations that are in place for improving the safety and reliability of the borough road network.</p>										

		<p>London Councils considers that the current discounting arrangements are a proportionate means to achieve better compliance.</p> <p>See 24.1</p>
24.15	Suggestion for discount rate to differ for repeat offenders	See 24.1
24.16	Concern it is a 'money making' scheme	<p>London boroughs have a legal duty under Section 16 of the Traffic Management Act 2004 to manage the road network with a view to ensuring the expeditious movement of traffic so far as is reasonably practicable and may take action to ensure the efficient and uncongested use of their road network.</p> <p>Parking and road traffic enforcement is a key tool to help manage motorists' behaviour on these roads. PCNs serve as an active deterrent that can help influence whether a motorist will contravene the regulations that are in place for improving the safety and reliability of the borough road network.</p> <p>By law, net revenues from contraventions must be used for relevant transport and environmental purposes in London. Income also covers the cost of the enforcement operation.</p> <p>Boroughs use any surplus revenue to make improvements to their transport infrastructure and to pay for concessionary fares – the Freedom Pass.</p> <p>The restrictions are in place for the safety and reliability of the network for all motorists. We believe a surcharge rate of 50% will deter parking, loading, bus lane and moving traffic contraventions which cause safety risks, disruption, and congestion for other road users and encourage early payment of a PCN to avoid any such increase.</p> <p>Ninety-five per cent of the road network in London is managed by the boroughs, and with around two billion car journeys made each year, parking and traffic management is integral to maintain the movement of traffic and safety of all road</p>

		<p>users. In this context enforcement is for the benefit of motorists who comply with the regulations. A surcharge for unpaid PCNs will only impact the minority of motorists who do not comply with the regulations, do not challenge/appeal or fail to pay on time.</p> <p>Any form of enforcement that involves penalties and surcharges, is meant to act as a deterrent, encourage positive behaviour change and increase compliance. Therefore, the PCNs must be set at a level that makes the borough road networks safer, for all London residents and visitors.</p> <p>See also 24.1, 24.7, 24.11</p>
24.17	Suggestion for discount rate to differ on circumstances	<p>PCNs are set at different levels depending on the Band and whether it is a higher or lower penalty charge, and London Councils believes that by applying a general rule of a 50% surcharge on all unpaid PCNs is the fairest and consistent rate as opposed to increasing it by a fixed value.</p> <p>London Councils does not support this proposal as it could potentially be difficult to administer and could add confusion for the public.</p>
24.18	General support for discount for early payments	<p>All PCNs include information about making a representation (challenging the PCN) to the issuing Authority and how long customers have got to do it. Representations can be made, online, in writing or via the phone service. Discounts are available for prompt payment.</p> <p>Following this stage, road users can appeal to the tribunal. More information, including escalation to London Tribunals can be found here: https://www.londontribunals.gov.uk/</p> <p>See also 24.1, 24.7, 24.11 and 24.16</p>
24.19	Concern about unfairness punishing a mistake/ unavoidable situation	<p>Boroughs use parking and moving traffic enforcement to improve compliance, not to penalise drivers. They actively promote the rules of their roads as well as ensuring that all on-street signage and infrastructure required to enforce the rules is fit for purpose.</p>

		<p>Signs and road markings on borough roads are there to inform drivers what they can and cannot do. To avoid being issued with a PCN, road users should ensure that they follow these signs and road markings.</p> <p>The rules for borough road networks are clearly explained in the latest edition of the Highway Code and are also explained on the London Councils website https://www.londoncouncils.gov.uk/services/parking-services/how-park-your-car-london</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/loading-and-unloading</p> <p>All PCNs include information about making a representation (challenging the PCN) to the issuing Authority and how long customers have got to do it. Representations can be made, online, in writing or via the phone service. Discounts are available for prompt payment.</p> <p>Following this stage, road users can appeal to the tribunal. More information, including escalation to London Tribunals can be found here: https://www.londontribunals.gov.uk/</p>
Question 24: Top 10 codes raised by Stakeholders		
24.20	Specified Percentage Discount From 21% to 40%	See 24.1
24.21	Specified Percentage for Discount From 41% to 60%	See 24.1
24.22	Specified Percentage for Discount From 61% to 80%	See 24.1
24.23	Specified Value of Increase From £0 to £30	See 24.1, 24.7 and 24.11
24.24	Concern the discount rate makes the charges too low	See 24.11

24.25	Specified Percentage for Discount 100%	See 24.1
24.26	Concern the discounts encourage continued poor behaviour	See 24.1, 24.7 and 24.18
24.27	General support for discount for early payments	n/a
24.28	Support for no discount at all	See 24.1
24.29	Support for discount to encourage payment	See 24.1
Question 25: Do you agree that the Charge Certificate surcharge should continue to increase the penalty charge by 50%?		
	This question did not include a free text option for further comment.	
Question 26: f you selected ‘No’ to any of the above options, please specify below how much you think the surcharge increase should be changed to?		
26.1	Specified Percentage for Increase From 21% to 40%	<p>Under the provisions set out in the Traffic Management Act 2004 (Schedule 9), which repealed similar provisions in the Road Traffic Act 1991, London Councils’ Transport and Environment Committee (TEC) is responsible, subject to agreement by the Mayor of London and possible veto (refusal) of the Secretary of State (SoS), for setting parking and traffic enforcement charges on borough roads.</p> <p>These parking enforcement charges, and additional fees include setting the surcharge percentage rate.</p> <p>It should be noted that surcharges for bus lane penalties under the LLA Act 1996 and moving traffic penalties under the LLA and TfL Act 2003 are set at 50% in the Schedules of these Acts and therefore London Councils cannot consider any changes to the surcharge rate for these contraventions.</p>

		<p>A surcharge of 50% is applied to other penalty charges and fines issued to individuals if they do not pay on time. This is similar practice to other enforcement regimes, such as Fixed Penalty Notices (FPNs) issued for a wide range of traffic and motoring offences, including speeding, driving without insurance, or failing to wear a seatbelt.</p> <p>London Councils does not support suggestions for lower percentage increases in relation to parking surcharges. A 50% increase is a fair and consistent apportionment for late payment of PCN, as is a 50% discount for early payment (see all points raised in question 24 above).</p> <p>A 50% increase in late payment of a penalty is also consistent with TfL's decision not to seek a change to their surcharge rates in 2022 and other enforcement bodies that issue penalties.</p>
26.2	Specified Percentage for Increase From 1% to 20%	See 26.1
26.3	Specified Percentage for Increase of 0%	See 26.1
26.4	Specified Percentage for Increase From 61% to 80%	See 26.1
26.5	Specified Percentage for Increase 100%	See 26.1
26.6	Support for the surcharge to stay the same	See 26.1
26.7	Concern surcharge disadvantages those who cannot afford charges	<p>Penalties can be avoided by complying with relevant parking and traffic regulations. A surcharge will only impact drivers that contravene the rules for parking and traffic on borough roads and do not pay the initial PCN on time or challenge/appeal it.</p> <p>The restrictions are in place for the safety and reliability of the network. We believe maintaining a surcharge rate of 50% will deter dangerous and inconsiderate parking behaviours which cause safety risks, disruption, and congestion for other road users and encourage early payment of a PCN if found to be in contravention.</p>

		<p>Boroughs use parking and moving traffic enforcement to improve compliance, not to penalise drivers. They actively promote the rules of their roads as well as ensuring that all on-street signage and infrastructure required to enforce the rules is fit for purpose.</p> <p>Signs and road markings on borough roads are there to inform drivers what they can and cannot do. To avoid being issued with a PCN, road users should ensure that they follow these signs and road markings.</p> <p>The rules for borough road networks are clearly explained in the latest edition of the Highway Code and are also explained on the London Councils website https://www.londoncouncils.gov.uk/services/parking-services/how-park-your-car-london</p> <p>https://www.londoncouncils.gov.uk/services/parking-services/loading-and-unloading</p> <p>All PCNs include information about making a representation (challenging the PCN) to the issuing Authority and how long customers have got to do it. Representations can be made, online, in writing or via the phone service. Discounts are available for prompt payment.</p> <p>Following this stage, road users can appeal to the tribunal. More information, including escalation to London Tribunals can be found here: https://www.londontribunals.gov.uk/</p> <p>See also 26.1</p>
26.8	Concern about impact on cost of living/ high inflation	See 26.1 and 26.7
26.9	Support for a decrease in all charges	See 26.1 and 26.7
26.10	Suggestion for the fee to double	See 26.1

26.11	Concern it is a 'money making scheme'	<p>London boroughs have a legal duty under Section 16 of the Traffic Management Act 2004 to manage the road network with a view to ensuring the expeditious movement of traffic so far as is reasonably practicable and may take action to ensure the efficient and uncongested use of their road network.</p> <p>Parking and road traffic enforcement is a key tool to help manage motorists' behaviour on these roads. PCNs serve as an active deterrent that can help influence whether a motorist will contravene the regulations that are in place for improving the safety and reliability of the borough road network.</p> <p>By law, net revenues from contraventions must be used for relevant transport and environmental purposes in London. Income also covers the cost of the enforcement operation.</p> <p>Boroughs use any surplus revenue to make improvements to their transport infrastructure and to pay for concessionary fares – the Freedom Pass.</p>
26.12	Specified Percentage for Increase From 41% to 60%	See 26.1
26.13	Concern about the governance and administration of the penalty charge system and communication	<p>While the governance and administration of the penalty charge system is not the subject of this consultation, London Councils notes that the London Local Authorities enforce their schemes in line with relevant civil enforcement regulations.</p> <p>London Councils provides information and guidance on council-issued tickets and the public's right to challenge and appeal them at:</p> <p>Parking penalties London Councils – Home</p>
26.14	Support for no surcharge at all	See 26.1, 26.7 and 26.11
26.15	General opposition to surcharge	See 26.1, 26.7 and 26.11
26.16	Concern motorists are unfairly targeted (anti-motorist agenda)	The restrictions are in place for the safety and reliability of the network for all motorists. We believe a surcharge rate of 50% will deter all parking contraventions which cause safety risks, disruption, and congestion for other road users and encourage early payment of a PCN to avoid any such increase.

		<p>This is also in line with the surcharge rates applied in legislation to bus lane and moving traffic contraventions.</p> <p>Ninety-five per cent of the road network in London is managed by the boroughs, and with around two billion car journeys made each year, parking and traffic management is integral to maintain the movement of traffic and safety of all road users. In this context enforcement is for the benefit of motorists who comply with the regulations. A surcharge for unpaid PCNs will only impact the minority of motorists who do not comply with the regulations, do not challenge/appeal or fail to pay on time.</p> <p>Any form of enforcement that involves penalties and surcharges, is meant to act as a deterrent, encourage positive behaviour change and increase compliance. Therefore, the PCNs must be set at a level that makes the borough road networks safer, for all London residents and visitors.</p> <p>See also 26.1, 26.7, 26.11</p>										
26.17	Specified Value of Increase From £0 to £30	<p>PCNs are set at different levels depending on the Band and whether it is a higher or lower penalty charge, and London Councils believes that by applying a general rule of a 50% surcharge on all unpaid parking PCNs is the fairest and consistent rate as opposed to increasing it by a fixed value.</p> <p>By applying a ‘fixed’ value rather than a percentage, this will have a disproportionate impact on those who receive a lower level PCN than those who receive a higher level PCN.</p> <p>E.g. Using £30 value as the maximum suggested surcharge rate increase against the current PCN levels in place:</p> <table><tr><th>Penalty Charge Levels</th><th>Band A (Higher)</th><th>Band A (Lower)</th><th>Band B (Higher)</th><th>Band B (Lower)</th></tr><tr><td>Current Amounts</td><td>£130</td><td>£80</td><td>£110</td><td>£60</td></tr></table>	Penalty Charge Levels	Band A (Higher)	Band A (Lower)	Band B (Higher)	Band B (Lower)	Current Amounts	£130	£80	£110	£60
Penalty Charge Levels	Band A (Higher)	Band A (Lower)	Band B (Higher)	Band B (Lower)								
Current Amounts	£130	£80	£110	£60								

		<table><tr><td>Current Surcharge at 50%</td><td>£195</td><td>£120</td><td>£165</td><td>£90</td></tr><tr><td>Suggested Maximum of £30 Surcharge</td><td>£160</td><td>£110</td><td>£140</td><td>£90</td></tr><tr><td>Difference</td><td>Pay -£35 less</td><td>Pay -£10 less</td><td>Pay -£25 less</td><td>Pay the same £0</td></tr></table> <p>See also 26.1</p>	Current Surcharge at 50%	£195	£120	£165	£90	Suggested Maximum of £30 Surcharge	£160	£110	£140	£90	Difference	Pay -£35 less	Pay -£10 less	Pay -£25 less	Pay the same £0
Current Surcharge at 50%	£195	£120	£165	£90													
Suggested Maximum of £30 Surcharge	£160	£110	£140	£90													
Difference	Pay -£35 less	Pay -£10 less	Pay -£25 less	Pay the same £0													
26.18	Concern individuals pay the surcharge due to limited time to pay/ extenuating circumstances	<p>Surcharges are avoidable costs and an extra cost that is only a consideration in respect of a PCN that remains unpaid.</p> <p>All PCNs include information about making a representation (challenging the PCN) to the issuing Authority and how long customers have got to do it. Representations can be made, online, in writing or via the phone service. Discounts are available for prompt payment.</p> <p>Following this stage, road users can appeal to the tribunal. More information, including escalation to London Tribunals can be found here: https://www.londontribunals.gov.uk/</p> <p>See also 26.1, 26.7, 26.11 and 26.16</p>															
26.19	Support acting as a greater deterrent and/or increased compliance	<p>Any form of enforcement that involves penalties and surcharges, is meant to act as a deterrent, encourage positive behaviour change and increase compliance. Therefore, the PCNs must be set at a level that makes the borough road networks safer, for all London residents and visitors.</p> <p>London Councils believes that a surcharge of a 50% increase on all parking PCNs is a fair and consistent apportionment for late payment of PCN, as is a 50% discount for early payment (see all points raised in question 24 above).</p>															

		A 50% increase in late payment of a penalty is consistent with TfL's decision not to seek a change to their surcharge rates in 2022 and in keeping with bus lane, moving traffic legislation.
Question 26: Top 10 codes raised by Stakeholders		
26.20	Specified Percentage for Increase 0%	See 26.1
26.21	Specified Percentage for Increase From 21% to 40%	See 26.1
26.22	Specified Percentage for Increase From 1% to 20%	See 26.1
26.23	Support for no surcharge at all	See 26.1, 26.7 and 26.11
26.24	Concern it is a 'money making scheme'	See 26.11
26.25	Specified Percentage for Increase 100%	See 26.1
26.26	Concern the higher surcharge will cause stress	See 26.1, 26,7 and 26.18
26.27	General support for surcharge	n/a
26.28	Support to increase surcharge for late payment	See 26.1
26.29	Support for the surcharge to stay the same	See 26.1

Appendix:1 Background Information Supplied to Respondents

- *London Councils published this additional information pack along with its consultation to help respondents understand the background to our consultation.*
- *It explains the current penalty charges for parking, bus lane and moving traffic, additional parking fees and the current discount and surcharge rates.*

We are reviewing the London Parking and Traffic Enforcement Penalty Charges and we want you to have your say.

We appreciate you taking the time to have a look at our consultation.

This is an information pack to help you to complete the questions that form part of this consultation.

Glossary of terms

Contravention: this occurs when a motorist does not follow the parking, bus lane and moving traffic regulations.

Deterrent: is to discourage someone from doing something:

Penalty Charge: is the charge you may have to pay if you have not followed parking, bus lane and moving traffic regulations.

Prescribed: set within the law

Surcharge: is a further charge that increases the penalty charge if it remains unpaid.

Who are we?

London Councils is the collective of local government in London. A cross-party organisation that represents the interests of all the London boroughs, including the City of London Corporation.

London Councils' Transport and Environment Committee is responsible for setting the parking and traffic penalty charges, fees, and rates.

The following lists all the areas that we wish to seek your opinions on:

- Penalty charges for parking contraventions (under the Traffic Management Act 2004)
- Penalty charges for bus lane contraventions (under the London Local Authorities Act 1996)

- Penalty charges moving traffic contraventions such as one-way streets, banned turns and yellow box junctions (under the London Local Authorities and Transport for London Act 2003)
- Fees for releasing vehicles from clamps and pounds
- Fees for vehicle storage and disposal
- Discount rate for early payment of a penalty charge
- Surcharge rate for an unpaid penalty charge

Any changes to the current parking and traffic enforcement penalty charges; fees and rates, will need to be approved by the Mayor of London and then the Secretary of State for Transport (who has the power to reject any such future proposals).

Why have we decided to review London's Parking and Traffic Enforcement Penalty Charges now?

Parking, bus lane and moving traffic penalty charges have not been reviewed since 2010 and many of the penalty charges and fees have not changed since 2007.

The number of people receiving penalty charges has increased by 50% over the last 12 years and there are concerns that the current penalty levels no longer act as a deterrent.

The increasing rate of inflation has also meant that there has been a reduction in the real value of penalty charges over time.

Local government, the Mayor and central government share the same aims: to increase active travel, improve road safety and reduce emissions (both air quality and carbon). Effective management of parking and traffic movement can help contribute towards this as well as improve traffic congestion.

Transport for London has similar responsibilities to London boroughs for setting penalty charges on their own roads, Red Routes. In 2021, Transport for London increased parking, bus lane and moving traffic penalty charges on the roads they manage from £130 to £160.

Many parking, bus lane and moving traffic contraventions are dangerous and have impacts on the safety of other road users, how they travel and access public transport services in London.

Current Parking and Traffic Enforcement Penalty Charges:

There are two factors that will impact the penalty charge amount if you are found to be parked in contravention (please see table below).

- 1) Band A and Band B penalty charges depend on where in London you have parked in contravention.

- 2) Differential penalty levels, known as Higher level and Lower level, depend on the type of contravention.

	Higher Level	Lower Level
Band A	£130	£80
Band B	£110	£60

Parking: Band A and Band B Parking Areas

This information refers to Parts 1 of the consultation.

Since 2011, London has been divided into two charging bands:

Band A penalty charges are higher and are more commonly used in areas with greater parking pressures, such as central London and urban town centres.

Band B penalty charges are lower and are more commonly used in outer London areas, where there is less pressure on parking.

An increasing number of boroughs now issue Band A penalty charges because they found that Band B penalty charges were too low to prevent poor parking behaviour. Current Bandings can be seen in the map below:



London boroughs continue to experience increasing incidents of motorists not following the parking regulations.

Differential Penalty Levels:

This information refers to Part 2 of the consultation.

Higher and Lower level penalty charges were introduced in 2007 and are based on the type of parking contravention that has occurred.

Higher level penalty charges apply to more serious contraventions where parking is not allowed, such as on yellow lines or where parking is only allowed for certain vehicle or permit types.

Lower level penalty charges apply to less serious contraventions where parking is allowed but the regulations have not been followed, such as overstaying in a pay and display bay.

See pages 156 and 161 of this report, for the full list of the Higher Level and Lower Level Contraventions in London that are subject to enforcement.

Additional Parking Fees:

This section refers to Part 4 of the consultation.

London boroughs can take additional enforcement action to clamp and/or remove a vehicle parked in contravention, although clamping is very uncommon, and vehicle removal is dependent on whether the borough has access to a vehicle pound.

- **Clamping:** if a vehicle is clamped, a 'release' fee will need to be paid as well as the penalty charge.
- **Removals:** Vehicles removed to a pound will also need to pay a release fee as well as the penalty charge and if it is not collected within 24 hours, daily 'storage' fees may also be added. If the vehicle is not collected within a prescribed time, the vehicle may be scrapped/disposed of, and a 'disposal' fee may apply.
- **Relocations:** many boroughs relocate vehicles parked in contravention to another location, so that it is no longer parked in contravention. Unlike clamping and removals, relocations do not have any additional fees, but a penalty charge will still be issued for the original parking contravention.
- **Abandoned vehicles:** these are vehicles that have been left unclaimed and often unroadworthy on borough roads.

Removal, storage and disposal fees also apply to vehicles that have been identified and removed as abandoned under environmental legislation. Any agreed changes to these fees, would also apply to these types of vehicles.

The current vehicle clamping, removal, storage, and disposal fees have not increased since 2007 and are listed below:

	Current charge
Clamping Fee	£70
Removal Fee	£200
Storage Fee (per day)	£40
Disposal Fee	£70

Bus Lane and Moving Traffic Contraventions

This section refers to Part 5 of the consultation.

The Transport and Environment Committee has responsibility for setting penalty charges for bus lane and moving traffic contraventions on borough roads, which currently carry the same penalty level as Band A, Higher level parking contraventions of £130.

The penalty charges are set at this higher amount to encourage motorists to not break the bus lane and moving traffic regulations, as this can be dangerous and have a negative impact on traffic flow and air quality.

On Transport for London roads, these penalty charges are now £160.

See pages 162 and 164 of this report, for the full list of the traffic contravention signs that are subject to civil enforcement.

Discount Rate:

This section refers to Part 6 of the consultation.

A discount rate of 50% is given to penalty charges that are paid during the discount period (usually within 14 days of receiving penalty).

This rate has worked very well over the years, with a high number of all parking, bus lane and moving traffic penalty charges being paid promptly, within the discount period.

It also means that the boroughs do not need to take any further action in recovering the penalty charges.

Charge Certificate Surcharge:

This section refers to Part 7 of the consultation.

A Charge Certificate is a legal notice issued by the borough, to notify the motorist that a surcharge has now been added to an unpaid outstanding penalty charge.

A surcharge increases the unpaid penalty charge by 50% after a prescribed period and under certain circumstances.¹

The table below shows the increased penalty charge amount, when a Charge Certificate surcharge of 50% has been issued:

	Higher Level Penalty Charge	Higher level with Charge Certificate Surcharge Increase	Lower Level	Lower level with Charge Certificate Surcharge Increase
Band A	£130	£195	£80	£120
Band B	£110	£165	£60	£90

Footnote 1:

A penalty charge has not been paid and no formal challenge (known as representations) has been made to the borough to request cancellation of the penalty charge before the end of a period of 28 days, beginning with the date a postal Penalty Charge Notice or Notice to Owner was served.

Representations have been made and a Notice of Rejection of Representations has been served by the borough and the penalty charge remains unpaid before the end of a period of 28 days, beginning with the date on which the Notice was served.

A Notice of Rejection of Representations has been served by the borough and no action has been taken to appeal the decision to the London Tribunals' adjudication service before the end of a period of 28 days, beginning with the date on which the notice was served.

Full payment has not been made before the end of a period of 28 days, beginning with the date on which an adjudicator's decision rejecting an appeal was served on the appellant.

Full payment has not been made following a period of 14 days, beginning with the date on which a withdrawal of an appeal was made by the appellant.

Higher Level and Lower Level Contraventions in London

On-Street

Code	General suffix(es)	Description	Diff. level	Notes
01	ajoyz	Parked in a restricted street during prescribed hours	Higher	Code specific suffixes apply. Suffixes y & z for disabled badge holders only. See additional notes
02	ajo	Parked or loading / unloading in a restricted street where waiting and loading / unloading restrictions are in force	Higher	Code specific suffixes apply. See additional notes
04	cs	Parked in a meter bay when penalty time is indicated	Lower	
05	cgpsuv1	Parked after the expiry of paid for time	Lower	
06	cipv1	Parked without clearly displaying a valid pay & display ticket or voucher	Lower	Higher level in Wales
07	cgmprsuv	Parked with payment made to extend the stay beyond initial time	Lower	'meter feeding'
08	c	Parked at an out-of-order meter during controlled hours	Lower	Electronic meters only
09	ps	Parked displaying multiple pay & display tickets where prohibited	Lower	
10	p	Parked without clearly displaying two valid pay and display tickets when required	Lower	"two" may be varied to another number or "multiple".
11	gu	Parked without payment of the parking charge	Lower	
12	arstuw4	Parked in a residents' or shared use parking place or zone without a valid virtual permit or clearly displaying a valid physical permit or voucher or pay and display ticket issued for that place where required, or without payment of the parking charge	Higher	Code specific suffixes apply
13		--- - RESERVED FOR TfL USE (LOW EMISSION ZONE) --- -	n/a	
14	ay89	Parked in an electric vehicles' charging place during restricted hours without charging	Higher	
16	abdehqstwx4569	Parked in a permit space or zone without a valid virtual permit or clearly displaying a valid physical permit where required	Higher	Code specific suffixes apply. Suffix "s" only for use where bay is completely non-resident
17		---- RESERVED FOR ROAD USER CHARGING USE ----	n/a	
18	abcdefghmprsvxy12356789	Using a vehicle in a parking place in connection with the sale or offering or exposing for sale of goods when prohibited	Higher	
19	airsuwx4	Parked in a residents' or shared use parking place or zone with an invalid virtual permit or displaying an invalid physical permit or voucher or pay and display ticket, or after the expiry of paid for time	Lower	Code specific suffixes apply
20		Parked in a part of a parking place marked by a yellow line where waiting is prohibited	Higher	
21	abcdefghlmnpqrsuvxy1256789	Parked wholly or partly in a suspended bay or space	Higher	
22	cflmnopsv1289	Re-parked in the same parking place or zone within one hour after leaving	Lower	"one hour" may be varied to another time period or "the prescribed time period"
23	abcdefghklprsvwxy123789	Parked in a parking place or area not designated for that class of vehicle	Higher	Suffix required to fully describe contravention
24	abcdefghlmnpqrsvxy1256789	Not parked correctly within the markings of the bay or space	Lower	
25	n2	Parked in a loading place or bay during restricted hours without loading	Higher	On-street loading bay or place
26	n	Parked in a special enforcement area more than 50 cm from the edge of the carriageway and not within a designated parking place	Higher	"50 cm" may be varied to another distance in Scotland.

27	no	Parked in a special enforcement area adjacent to a footway, cycle track or verge lowered to meet the level of the carriageway	Higher	
28	no	Parked in a special enforcement area on part of the carriageway raised to meet the level of a footway, cycle track or verge	Higher	
29	j	Failing to comply with a one-way restriction	n/a	
30	acfglmnopsuy12789	Parked for longer than permitted	Lower	
31	j	Entering and stopping in a box junction when prohibited	n/a	
32	jdt	Failing to proceed in the direction shown by the arrow on a blue sign	n/a	Code-specific suffixes apply.
33	jbcefgghikrsyz	Using a route restricted to certain vehicles	n/a	Code-specific suffixes apply.
34	j0	Being in a bus lane	n/a	
35		Parked in a disc parking place without clearly displaying a valid disc	Lower	
36	j	Being in a mandatory cycle lane	n/a	
37	j	Failing to give way to oncoming vehicles	n/a	
38	jlr	Failing to comply with a sign indicating that vehicular traffic must pass to the specified side of the sign	n/a	Code-specific suffixes apply.
39		---- RESERVED FOR TfL USE (ULTRA LOW EMISSION ZONE) ----	n/a	
40	n	Parked in a designated disabled person's parking place without displaying a valid disabled person's badge in the prescribed manner	Higher	
41		Stopped in a parking place designated for diplomatic vehicles	Higher	
42		Parked in a parking place designated for police vehicles	Higher	
43		Stopped on a cycle docking station parking place	Higher	
45	nw	Stopped on a taxi rank	Higher	"stopped" may be varied to "waiting"
46	n	Stopped where prohibited (on a red route or clearway)	Higher	
47	jn	Stopped on a restricted bus stop or stand	Higher	
48	j	Stopped in a restricted area outside a school, a hospital or a fire, police or ambulance station when prohibited	Higher	CCTV can be used on a restricted area outside a school only
49	j	Parked wholly or partly on a cycle track or lane	Higher	
50	jlr	Performing a prohibited turn	n/a	Code-specific suffixes apply.
51	j	Failing to comply with a no entry restriction	n/a	
52	jgmsvx	Failing to comply with a prohibition on certain types of vehicle	n/a	Code-specific suffixes apply.
53	cj	Failing to comply with a restriction on vehicles entering a pedestrian zone	n/a	'and cycle' may be added (see additional notes)
54	cj	Failing to comply with a restriction on vehicles entering and waiting in a pedestrian zone	n/a	'and cycle' may be added (see additional notes)
55		A commercial vehicle parked in a restricted street in contravention of the Overnight Waiting Ban	Higher	
56		Parked in contravention of a commercial vehicle waiting restriction	Higher	Non- overnight waiting restriction
57		Parked in contravention of a bus ban	Higher	Non- overnight waiting restriction
58		Using a vehicle on a restricted street during prescribed hours without a valid permit	n/a	London Lorry Control Scheme
59		Using a vehicle on a restricted street during prescribed hours in breach of permit conditions	n/a	London Lorry Control Scheme
61	124cgn	A heavy commercial vehicle wholly or partly parked on a footway, verge or land between two carriageways	Higher	Code-specific suffixes apply.
62	124cgn	Parked with one or more wheels on or over a footpath or any part of a road other than a carriageway	Higher	Code-specific suffixes apply.

63		Parked with engine running where prohibited	Lower	
64	124	Parked in contravention of a notice prohibiting leaving vehicles on a grass verge, garden, lawn or green maintained by a local authority	n/a	Code-specific suffixes apply. For use in Essex only
65	124	Parked in contravention of a notice prohibiting leaving vehicles on land laid out as a public garden or used for the purpose of public recreation	n/a	Code-specific suffixes apply. For use in Essex only.
66	124cg	Parked on a verge, central reservation or footway comprised in an urban road	n/a	Code-specific suffixes apply. For use in Exeter only.
67		Using a vehicle on a restricted street without a valid HGV Safety Permit	n/a	HGV Safety Permit Scheme (Direct Vision Standard)
68		Using a vehicle on a restricted street in breach of HGV Safety Permit conditions	n/a	HGV Safety Permit Scheme (Direct Vision Standard)
72		--- RESERVED FOR BUILDERS' SKIPS CONTRAVENTIONS ---		London only
75		--- RESERVED FOR LITTERING FROM MOTOR VEHICLES ---		
76		-- RESERVED FOR WASTE RECEPTACLE CONTRAVENTIONS --		London only
97		Driving a motor vehicle in an unrestricted street in excess of the posted speed limit	n/a	London only
99	no	Stopped on a pedestrian crossing or crossing area marked by zigzags	Higher	Pedestrian Crossings

Higher Level and Lower Level Contraventions in London

Off-Street

70		Parked in a loading place or bay during restricted hours without loading	Higher	Off-street loading areas
71		Parked in an electric vehicles' charging place during restricted hours without charging	Higher	Off-street car parks
73	gu	Parked without payment of the parking charge	Lower	Off-street car parks
74	prs	Using a vehicle in a parking place in connection with the sale or offering or exposing for sale of goods when prohibited	Higher	Off-street car parks
77		--- RESERVED FOR DVLA USE ---	n/a	
78	abdefghklpqvu156789	Parked wholly or partly in a suspended bay or space	Higher	Off-street car parks
80	gu	Parked for longer than permitted	Lower	Off-street car parks
81	o	Parked in a restricted area in an off-street car park or housing estate	Higher	Off-street car parks
82	puv4	Parked after the expiry of paid for time	Lower	Off-street car parks
83	4	Parked in a car park without clearly displaying a valid pay & display ticket or voucher or parking clock	Lower	Off-street car parks
84	gu	Parked with payment made to extend the stay beyond initial time	Lower	Off-street car parks
85	abtrwyz45	Parked without a valid virtual permit or clearly displaying a valid physical permit where required	Higher	Off-street car parks. Code specific suffixes apply.
86	prs	Not parked correctly within the markings of a bay or space	Lower	Off-street car parks
87		Parked in a designated disabled person's parking place without displaying a valid disabled person's badge in the prescribed manner	Higher	Off-street car parks
89		Vehicle parked exceeds maximum weight or height or length permitted	Higher	Off-street car parks
90	psuv	Re-parked in the same car park within one hour after leaving	Lower	Off-street car parks. "one hour" may be varied to another time period or "the prescribed time period"

91	cg	Parked in a car park or area not designated for that class of vehicle	Higher	Off-street car parks
92	o	Parked causing an obstruction	Higher	Off-street car parks
93		Parked in car park when closed	Lower	Off-street car parks
94	p	Parked in a pay & display car park without clearly displaying two valid pay and display tickets when required	Lower	Off-street car parks. "two" may be varied to another number or "multiple"
95		Parked in a parking place for a purpose other than that designated	Lower	Off-street car parks
96		Parked with engine running where prohibited	Lower	Off-street car parks

Suffixes and Additional Notes

General suffixes: –

a) permit holder only electric vehicle charging bay	n) red route	0) local buses / trams only
b) business bay	o) blue badge holder	1) electric vehicles bay
c) buses only	p) pay & display	2) goods vehicle loading bays
d) doctor's bay	q) market traders' bay	3) bicycle bay
e) car club bay	r) residents' bay	4) virtual permit
f) free parking bay	s) shared use bay	5) dedicated disabled bay
g) motorcycle bay	t) voucher/P&D ticket used in permit bay	6) hotel bay
h) hospital bay	u) electronic payment	7) taxis only
i) wrong type of voucher	v) voucher	8) zero emission capable taxis only
j) camera enforcement	w) e-scooter bay	9) electric vehicle car club bay
k) ambulance bay	x) disabled bay	
l) loading place	y) electric solo motorcycle bay	
m) parking meter		

Restricted street (codes 01 and 02) only: -

Suffix a) 'temporary traffic order' (code specific)

Permit contraventions (codes 01, 12, 16, 19 and 85) only: -

- w) wrong parking zone
- x) incorrect VRM
- y) obscured/illegible permit
- z) out of date permit (code specific)

Note: Suffixes 'y' and 'z' are applicable on code 01 for Blue Badge contraventions only

Taxi Ranks (code 45) only: -

- w) amends the contravention code description to change the wording from 'stopped' to 'waiting'

Footway parking (codes 61, 62, 64, 65 and 66) only: –

- 1) one wheel on footway
- 2) partly on footway
- 4) all wheels on footway
- c) on vehicle crossover
- g) on grass verge

Moving traffic contraventions only: –

32 d) proceeding in the wrong direction
32 t) turning in the wrong direction
33 b) buses only
33 c) buses and cycles only
33 e) buses, cycles and taxis only
33 f) buses and taxis only
33 g) local buses only
33 h) local buses and cycles only

33 i) local buses, cycles and taxis only
33 k) local buses and taxis only
33 q) tramcars and local buses only
33 r) tramcars only
33 s) tramcars and buses only
33 y) pedal cycles only
33 z) pedal cycles and pedestrians only

38 l) must pass to the left
38 r) must pass to the right
50 l) no left turn
50 r) no right turn
50 u) no U-turn
52 b) buses

52 g) goods vehicles exceeding max gross weight indicated
52 m) motor vehicles
52 s) solo motorcycles
52 v) all vehicles except non-mechanically propelled ones being pushed
52 x) motor vehicles except solo m/cycles

53 Code specific suffix c) amends the description to add 'and cycle' after the word pedestrian

54 Code specific suffix c) amends the description to add 'and cycle' after the word pedestrian




Camera Enforcement

Suffix 'j' identifies a contravention that can be used on highways other than red routes using CCTV. The suffix itself is not required on a PCN.

For contravention codes 01 and 02, Suffix 'j' can only be used if there is also a mandatory cycle lane at the location (London and England only)

The Full list of the Traffic Offences Signs that are Subject to Civil Enforcement 2023

Description	TSRGD diagram number & location	
Vehicular traffic must proceed in the direction indicated by the arrow	606 (Schedule 3, Part 2, item 1 and Schedule 14, Part 2, item 42)	
Vehicular traffic must turn ahead in the direction indicated by the arrow	609 (Schedule 3, Part 2, item 2)	
Vehicular traffic must keep to the left/right of the sign indicated by the arrow	610 (Schedule 3, Part 2, item 3)	
No right turn for vehicular traffic	612 (Schedule 3, Part 2, item 7 and Schedule 14, Part 2, item 43)	
No left turn for vehicular traffic	613 (Schedule 3, Part 2, item 8 and Schedule 14, Part 2, item 43)	
No U-turns for vehicular traffic	614 (Schedule 3, Part 2, item 6 and Schedule 14, Part 2, item 43)	
Priority must be given to vehicles from the opposite direction	615 (Schedule 3, Part 2, item 9)	
No entry for vehicular traffic (when the restriction or prohibition is one that may be indicated by another traffic sign subject to civil enforcement)	616 (Schedule 3, Part 2, item 10 and Schedule 14, Part 2, item 44)	
All vehicles prohibited except non-mechanically propelled vehicles being pushed by pedestrians	617 (Schedule 3, Part 2, item 11)	

Description	TSRGD diagram number & location	
Entry to and waiting in a pedestrian zone restricted	618.3B (Schedule 8, Part 2, item 1)	
Entry to and waiting in a pedestrian and cycle zone restricted	618.3C (Schedule 8, Part 2, item 2)	
Motor vehicles prohibited	619 (Schedule 3, Part 2, item 12)	
Motor vehicles except solo motorcycles prohibited	619.1 (Schedule 3, Part 2, item 18)	
Solo motorcycles prohibited	619.2 (Schedule 3, Part 2, item 20)	
Goods vehicles exceeding the maximum gross weight indicated on the goods vehicle symbol prohibited	622.1A (Schedule 3, Part 2, item 13)	
One-way traffic	652 (Schedule 9, Part 4, item 5)	
Buses prohibited	952 (Schedule 3, Part 2, item 17)	

Description	TSRGD diagram number & location	
Route for use by buses, pedal cycles and taxis only	953 (Schedule 3, Part 2, item 33)	
Route for use by tramcars only	953.1 (Schedule 3, Part 2, item 36)	
Route for use by pedal cycles only	955 (Schedule 3, Part 2, item 28)	
Route for use by pedal cycles and by pedestrians only	956 (Schedule 3, Part 2, item 29)	
Route comprising two ways, for use by pedal cycles only and by pedestrians only	957 (Schedule 3, Part 2, item 32)	
With-flow cycle lane	959.1 (Schedule 9, Part 4, item 9)	
Contra-flow cycle lane	960.1 (Schedule 9, Part 4, item 6)	
Part of the carriageway outside an entrance where vehicles must not stop when the marking is placed in conjunction with the prescribed upright sign which includes the symbol at Schedule 4, Part 3, item 10	1027.1 (Schedule 7, Part 4, item 10)	
Box junction markings	1043 (Schedule 9, Part 6, item 25)	

Appendix 2: Stakeholder Engagement List 2023

London Councils consulted with the following stakeholders groups:

- Local authorities and statutory bodies
- Government departments, parliamentary bodies and politicians
- Greater London Authority
- Emergency services and healthcare
- Accessibility groups
- Transport and road user groups
- Business groups
- Businesses, employers and venues
- Community and local interest groups
- Others

London Councils also requested that TfL publicise our consultation with their wider stakeholders groups (some of whom may coincide with the list below).

This was to ensure that this London-wide consultation received full exposure and provide all stakeholders with the opportunity to take part, particularly if any of our proposals were to have an impact on their business or services.

20's Plenty (for us)
AccessAble
Action on Disability
Action Vision Zero
Age UK
Alzheimer's Society
Asthma UK and British Lung Foundation
Association of International Courier and Express Services
Better Bankside
Blind Aid
Brewery Logistics Group
Brewing, Food & Beverage Industry Suppliers Association
British Chambers of Commerce
British Beer and Pub Association
British Heart Foundation
British Independent Retailers Association
British Motorcyclists Federation

British Parking Association
British Property Federation
British Retail Consortium
British Transport Police
British Vehicle Rental and Leasing Association
Business LDN (London First)
Cadent Gas
Campaign for Better Transport
Carers UK
Central London Alliance
Central London Forward
Centre for Cities
Centre for London
City of London Police
Clean Air London
Cold Chain Federation
Colt
Commission for Equalities and Human Rights
Confederation of British Industry London Region
Confederation of Passenger Transport
Contact a Family
Cross River Partnership
DLUHC
Department for Transport
Disability Rights UK
Disabled Motoring UK
Dott
Energy Hub
English Heritage
Energy Saving Trust
EO Charging
Essex and Suffolk Water
EU Networks

Federation of Small Businesses
Fight for Sight
Friends of the Earth
Gatwick Airport
GMB Union
Greater London Authority
Guide Dogs UK
Heathrow Airport
Highways England
Historic England
Home Office
Human Forest
Inclusion London
Independent Disability Advisory Group
Innovate UK
Institute of Couriers
Institute of Directors
Learning Disabilities Forum (Choice)
Licenced Private Hire Car Association
Licensed Taxi Drivers Association Ltd
Lime
Living Streets
Local Government Association
Logistics UK
London Ambulance Service NHS Trust
London Cab Drivers Club
London Chamber of Commerce and Industry
London City Airport
London Cycling Campaign
London First
London Luton Airport
London Private Hire Car Association
London Road Safety Council

London Tourism Co-operative
London Travelwatch
London Vision UK
LoTAG
Low Pay Commission
Mencap
Metropolitan Police
MIND
Mineral Products Association
Mobilise Organisation
Motorcycle Action Group
Motorcycle Industry Association
Mums for Lungs
National Asthma Campaign
National Autistic Society
National Highways
National Market Traders Association
National Performance Advisory Group (NHS)
National Grid
National Trust
Network Rail
New West End Company
NHS London Healthy Urban Development Unit
Night-time Industries Association
Openreach
Parkinson's UK
Port of London Authority
Primary Care Trust Barking and Dagenham
Primary Care Trust Barnet
Primary Care Trust Bexley
Primary Care Trust Brent
Primary Care Trust Bromley
Primary Care Trust Camden

Primary Care Trust City of London
Primary Care Trust Croydon
Primary Care Trust Ealing
Primary Care Trust Enfield
Primary Care Trust Greenwich
Primary Care Trust Hackney
Primary Care Trust Hammersmith and Fulham
Primary Care Trust Haringey
Primary Care Trust Harrow
Primary Care Trust Havering
Primary Care Trust Hillingdon
Primary Care Trust Hounslow
Primary Care Trust Islington
Primary Care Trust Kensington and Chelsea
Primary Care Trust Kingston
Primary Care Trust Lambeth
Primary Care Trust Lewisham
Primary Care Trust Merton
Primary Care Trust Newham
Primary Care Trust Redbridge
Primary Care Trust Richmond
Primary Care Trust Southwark
Primary Care Trust Sutton
Primary Care Trust Tower Hamlets
Primary Care Trust Waltham Forest
Primary Care Trust Wandsworth
Primary Care Trust Westminster
RAC
Rail Freight Group
Retail Motor Industry Federation
RNIB
RNID
Road Haulage Association

Royal Association for Deaf People
Royal Mail
Royal Society of Blind Children
Scope
Showmen's Guild of Great Britain
SMMT
South East London Chamber of Commerce
South Eastern Region TUC
Suez Water
Sustrans
Suzy Lamplough Trust
Talk Talk
Thames Water
The AA
The Disabled Persons Transport Advisory Committee (DPT)
The London Fire and Emergency Planning Authority
The National Courier and Despatch Association
Thames Clipper
The Royal Parks Constabulary
The Royal Transport Consultancy
The United Kingdom Warehousing Association
Tideway London
TIER
Transport Focus/ Transport Watchdog
Transport for All
Transport for London
Uber
UK Coach Operators Association
UK Hospitality
UK Power Networks
Unicef UK
Unison
Unite

United Private Hire Drivers
VOSA (now DVSA)
West London Waste
WestTrans
Whizz Kidz

Appendix 3: London Councils Equalities Impact Assessment

1) Name of policy, service or function being assessed:

London Parking & Traffic Enforcement Penalty Charges and Fees in London

2) Service Area:

Traffic & Parking Services under the Transport & Mobility Directorate

3) Strategic Context:

Under the provisions set out in the Traffic Management Act 2004 (Schedule 9), which repealed similar provisions in the Road Traffic Act 1991, London Councils' Transport and Environment Committee (TEC) is responsible, subject to agreement by the Mayor of London and possible veto of the Secretary of State, for setting parking and traffic enforcement charges on borough roads.

These parking enforcement charges, and additional fees include:

- penalties for contraventions of the parking regulations issued under the Traffic Management Act 2004 including any discounts and surcharges
- release from wheel clamps
- vehicles removed from the street and impounded
- vehicle storage and disposal fees

TEC also has the responsibility for:

- setting penalty levels in respect of bus lane contraventions (under the London Local Authorities Act [LLA Act] 1996)
- setting penalty levels in respect of moving traffic contraventions; one-way streets; banned turns and yellow box junctions etc (under the London Local Authorities and Transport for London Act [LLA and TfL Act] 2003)
- setting penalty levels in respect of the London Lorry Control Scheme (LLCS) (under the London Local Authorities and Transport for London Act 2003)
- setting the rate of discount which applies to the early payment of all penalties within 14 days of issue and the rate of surcharge for parking contraventions under the Traffic Management Act 2004 which applies to the late payment of penalties. The discount and surcharge rate has been set at 50%. It should be noted that surcharges for bus lane penalties under the LLA Act 1996 and moving traffic penalties under the LLA and TfL Act 2003 are set at 50% in the Schedules of those Acts.

Under the Traffic Management Act 2004 the Secretary of State's 'Statutory Guidance for Local Authorities on the Civil Enforcement of Parking Contraventions 2022' states that "The primary purpose of penalty charges is to encourage compliance with parking restrictions. In pursuit of this, enforcement authorities should adopt the lowest charge level consistent with a high level of public acceptability and compliance."

There are requirements to consult on parking and traffic enforcement penalty charges and additional parking fees either in statute or in statutory guidance and it is also TEC's policy that parking charges should be set in such a way as to produce a coherent pattern of policy across London.

Historically, London Councils had undertaken a public consultation to review parking and traffic enforcement charges every four years. However, London Councils has not sought to either jointly with Transport for London (TfL) or independently consult on the level of charges since 2010, due to the lack of support from successive governments during this period.

95% of the road network in London is managed by the boroughs, and with around two billion car journeys made each year, parking and traffic management is integral to maintaining the movement of traffic and safety of all road users. Any form of enforcement that involves penalties is meant to act as a deterrent, encourage positive behaviour change and increase compliance.

It has been 13 years since any increases in penalty charges have been introduced and there is evidence of a correlation between non-compliance and Penalty Charge Notices (PCNs) perceived as a 'financial' deterrent by motorists.

Therefore, the PCNs should be set at a level that is perceived to be an effective deterrent by motorists, and help make the borough road networks safer, for all London residents and visitors.

In December 2021, the Mayor of London approved an increase in PCNs for parking and stopping; bus lane and moving traffic contraventions on the Transport for London Road Network (TLRN) from £130 to £160.

The consultation also agreed the proposed new penalty charge would continue to be reduced by 50% if paid within 14 days and to be increased by 50% following non-payment after a period of 28 days.

The changes on the TLRN were approved by the Secretary of State and as this was not a joint consultation with TfL, the penalty charges for London boroughs and City of London (referred to as 'the boroughs' for the purposes of this report) have remained unchanged.

4) Aims and Recommendations:

The aim is to bring consistency between all civil enforcement penalties for the most serious higher level Parking, Bus Lane, Moving Traffic Contraventions in line with Transport for London's 23% increase, and to increase the lower level penalties, given there has been no increase in value since 2011 and some since 2007.

Parking restriction controls on the borough road networks are designed to discourage stopping or parking where it is dangerous or disruptive to other road users.

Non-compliant use of bus lanes impacts bus journey times, customer experience and the attractiveness of public transport as an alternative mode of transport to private car use.

Improved compliance of moving traffic contraventions such as banned turns and yellow box junctions, ensures the safety of all road users, reducing congestion and allows more free flowing access for the emergency service vehicles.

Additional parking-related fees to be increased in line with current inflation rates, given that there has been no increase since 2007.

Obstructive/dangerously parked vehicles or those parked in a disabled persons bay without a valid Blue Badge or a lost/stolen or fraudulent badge on display can put the most vulnerable protected groups and others at risk.

Persistently evading parking and traffic regulations, whereby there are three or more outstanding or unchallenged penalties incurred by a motorist, can lead to further action and warrants being issued.

The discount and surcharge rates are to stay at 50%. This is the fairest apportionment for a decrease in early payment and an increase in late payment of PCN.

5) Impact:

Equality Area	No adverse impact	Low adverse impact	Medium adverse impact	High adverse impact
Age	X			
Disability	X			
Gender reassignment	X			
Marriage and civil partnership	X			
Pregnancy and maternity	X			
Race	X			
Religion/belief	X			
Sex	X			
Sexual orientation	X			

6) Brief Summary of Reasons for Results:

Equality Area	Are any groups disproportionately impacted by the changes (who, how and why)?
Age	<p>No Adverse Impact</p> <p>Any PCN increase will positively impact those of a more vulnerable age by reducing the number of safety issues associated with inconsiderate or dangerous traffic and parking behaviours – making the borough road networks safer, for all by reducing accessibility problems and risks, and improving reliability for public transport will also be realised as result in the compliance.</p> <p>Improved safety on borough road networks, including air quality and congestion, is likely to promote the health and wellbeing of all demographics including those with protected characteristics that live and work in London.</p>
Disability	<p>No Adverse Impact</p> <p>Any change to the PCN value is likely to have a positive impact on motorists with a disability, as parking and traffic compliance will improve and deter inconsiderate and dangerous parking and driving behaviours.</p> <p>This will also reinforce the correct use of Disabled parking bays, whilst those with severe mobility difficulties and require the use of a wheelchair or walking aid will benefit from a reduction in footway parking contraventions.</p> <p>Although those with a Blue Badge (or the equivalent in certain boroughs), may still receive a penalty charge for improper use, this is not deemed to have a disproportionate impact. There is no evidence to suggest that Blue Badge holders are less able to abide by restrictions than non- disabled drivers who might contravene the restrictions.</p> <p>Improved safety on borough road networks, including air quality and congestion, is likely to promote the health and wellbeing of all demographics including those with protected characteristics that live and work in London.</p>
Gender reassignment	<p>No Adverse Impact</p> <p>Improved safety on borough road networks, including air quality and congestion, is likely to promote the health and wellbeing of all demographics including those with protected characteristics that live and work in London.</p>
Marriage and civil partnership	<p>No Adverse Impact</p>

	Improved safety on borough road networks, including air quality and congestion, is likely to promote the health and wellbeing of all demographics including those with protected characteristics that live and work in London.
Pregnancy and maternity	No Adverse Impact Improved safety on borough road networks, including air quality and congestion, is likely to promote the health and wellbeing of all demographics including those with protected characteristics that live and work in London.
Race	No Adverse Impact Improved safety on borough road networks, including air quality and congestion, is likely to promote the health and wellbeing of all demographics including those with protected characteristics that live and work in London.
Religion/belief	No Adverse Impact Improved safety on borough road networks, including air quality and congestion, is likely to promote the health and wellbeing of all demographics including those with protected characteristics that live and work in London.
Sex	No Adverse Impact Improved safety on borough road networks, including air quality and congestion, is likely to promote the health and wellbeing of all demographics including those with protected characteristics that live and work in London.
Sexual orientation	No Adverse Impact Improved safety on borough road networks, including air quality and congestion, is likely to promote the health and wellbeing of all demographics including those with protected characteristics that live and work in London.

7) Consultation:

A wide range of sources including Census 2021, TfL and GLA data and research provided an understanding of:

- the distribution of people with protected characteristics and socio-economically deprived communities across Greater London
- the current use of different modes of transport, by people with protected characteristics

London Councils will work closely with a number of internal and external stakeholders:

- Communication and Media Team
- Corporate Management Team

- City of London Legal
- Finance
- 32 London Boroughs
- City of London
- Transport for London
- Department for Transport
- Greater London Authority

A public consultation takes place between 31 July 2023 and 23 October 2023.

8) Conclusions:

- Continue with the current Band A and Band B two-tier regime in London
- Introduce an increase of 23% equivalent to TfL for Higher Level PCNs whilst keeping the £50 difference between Higher and Lower Level PCNs as the same.
- Introduce an increase of 43.6% in line with inflation since 2011 to September 2024 for all the other additional parking fees
- Discount and surcharge rates remain at 50%.

Relevance assessment completed by:

NAME: Mital Patel

DIRECTORATE/DIVISION: Transport & Mobility

DATE: 30 July 2023

Appendix 3: London Councils Equalities Impact Assessment

1. Name of policy, service or function being assessed:

London Parking & Traffic Enforcement Penalty Charges and Fees in London

2. Service Area:

Traffic & Parking Services under the Transport & Mobility Directorate

3. Strategic Context:

Under the provisions set out in the Traffic Management Act 2004 (Schedule 9), which repealed similar provisions in the Road Traffic Act 1991, London Councils' Transport and Environment Committee (TEC) is responsible, subject to agreement by the Mayor of London and possible veto of the Secretary of State, for setting parking and traffic enforcement charges on borough roads.

These parking enforcement charges, and additional fees include:

- penalties for contraventions of the parking regulations issued under the Traffic Management Act 2004 including any discounts and surcharges
- release from wheel clamps
- vehicles removed from the street and impounded
- vehicle storage and disposal fees

TEC also has the responsibility for:

- setting penalty levels in respect of bus lane contraventions (under the London Local Authorities Act [LLA Act] 1996)
- setting penalty levels in respect of moving traffic contraventions; one-way streets; banned turns and yellow box junctions etc (under the London Local Authorities and Transport for London Act [LLA and TfL Act] 2003)
- setting penalty levels in respect of the London Lorry Control Scheme (LLCS) (under the London Local Authorities and Transport for London Act 2003)
- setting the rate of discount which applies to the early payment of all penalties within 14 days of issue and the rate of surcharge for parking contraventions under the Traffic Management Act 2004 which applies to the late payment of penalties. The discount and surcharge rate has been set at 50%. It should be noted that surcharges for bus lane penalties under the LLA Act 1996 and moving traffic penalties under the LLA and TfL Act 2003 are set at 50% in the Schedules of those Acts.

Under the Traffic Management Act 2004 the Secretary of State's 'Statutory Guidance for Local Authorities on the Civil Enforcement of Parking Contraventions 2022' states that "The primary purpose of penalty charges is to encourage compliance with parking restrictions. In pursuit of this, enforcement authorities should adopt the lowest charge level consistent with a high level of public acceptability and compliance."

There are requirements to consult on parking and traffic enforcement penalty charges and additional parking fees either in statute or in statutory guidance and

it is also TEC's policy that parking charges should be set in such a way as to produce a coherent pattern of policy across London.

Historically, London Councils had undertaken a public consultation to review parking and traffic enforcement charges every four years. However, London Councils has not sought to either jointly with Transport for London (TfL) or independently consult on the level of charges since 2010, due to the lack of support from successive governments during this period.

95% of the road network in London is managed by the boroughs, and with around two billion car journeys made each year, parking and traffic management is integral to maintaining the movement of traffic and safety of all road users. Any form of enforcement that involves penalties is meant to act as a deterrent, encourage positive behaviour change and increase compliance.

It has been 13 years since any increases in penalty charges have been introduced and there is evidence of a correlation between non-compliance and Penalty Charge Notices (PCNs) perceived as a 'financial' deterrent by motorists.

Therefore, the PCNs should be set at a level that is perceived to be an effective deterrent by motorists, and help make the borough road networks safer, for all London residents and visitors.

In December 2021, the Mayor of London approved an increase in PCNs for parking and stopping; bus lane and moving traffic contraventions on the Transport for London Road Network (TLRN) from £130 to £160, bringing this in line with the penalties for non-payment of the Congestion Charge and the Ultra-Low Emission Zone which are also currently set at £160. Transport for London's (TfL's) consultation also agreed the proposed new penalty charge would continue to be reduced by 50% if paid within 14 days and to be increased by 50% following non-payment after a period of 28 days.

The changes on the TLRN were not contested by the Secretary of State and as this was not a joint consultation with TfL, the penalty charges for London boroughs and City of London (referred to as 'the boroughs' for the purposes of this report) have remained unchanged.

4. Aims :

The aim is to bring consistency between all civil enforcement penalties for the most serious higher level Parking, Bus Lane, Moving Traffic Contraventions in line with Transport for London's 23% increase, and to increase the lower level penalties, given there has been no increase in value since 2011 and some since 2007.

In addition to this, given the Mayor's, TfL's, boroughs and central Government's shared aims of increasing active travel and reducing road danger, emissions (both air quality and carbon), London Councils considers that it is time to reevaluate these penalty levels and any associated parking fees.

London Councils proposals were subject to a public consultation that ran from 31 July 2023, for a consecutive 12 weeks and ended on 23 October 2023. Responses to that Public Consultation have been considered before determining if the boroughs would seek Mayoral approval for increasing the PCN levels including the additional parking fees.

The proposed increase in the PCN levels and fees will ensure that enforcement provides an effective deterrent to drivers contravening the rules which are in place for the safety and reliability of the borough road network and supports the Mayor's Transport Strategy and Vision Zero approach to reducing harm on London's roads.

Parking restriction controls on the borough road networks are designed to discourage stopping or parking where it is dangerous or disruptive to other road users.

Non-compliant use of bus lanes impacts bus journey times, customer experience and the attractiveness of public transport as an alternative mode of transport to private car use.

Improved compliance of moving traffic contraventions such as banned turns and yellow box junctions, ensures the safety of all road users, reducing congestion and allows more free flowing access for the emergency service vehicles.

Additional parking-related fees to be increased in line with current inflation rates, given that there has been no increase since 2007.

Obstructive/dangerously parked vehicles or those parked in a disabled persons bay without a valid Blue Badge or a lost/stolen or fraudulent badge on display can put the most vulnerable protected groups and others at risk.

Persistently evading parking and traffic regulations, whereby there are three or more outstanding or unchallenged penalties incurred by a motorist, can lead to further action and warrants being issued.

The discount and surcharge rates are to stay at 50%. This is the fairest apportionment for a decrease in early payment and an increase in late payment of PCN.

If the proposals are approved by the Mayor and Secretary of State, London Councils and the boroughs will formally notify members of the public, through various communication platforms and undertake a press release advising of these changes.

5. Impact on Boroughs and Road Users:

Boroughs: If the proposals are agreed, London Councils does not expect there to be any significant impact on the boroughs in terms of workload or process following implementation.

Civil Enforcement Officers (CEOs) who issue PCNs on-street will be briefed on the changes and how to respond to any questions or complaints about the increase. Boroughs are expected to closely monitor the impact of this on their staff to mitigate any impact of the changes on increased violence or aggression towards frontline staff. CEOs are provided with body worn cameras, which is proven to reduce staff assaults and have been fully trained in conflict management and regularly work in pairs.

London Councils' proposals may result in an increase of customer service enquiries within each individual borough and this will be mitigated by very clear customer information through communications and press activity, as well as supporting information on their websites, as well as London Councils' own platform.

Road users: London Councils has given serious consideration to its proposals to increase the penalty charge levels and additional parking fees with the primary objective being to achieve compliance, and not to penalise motorists.

These penalties and any additional fees can be avoided if the rules and regulations on borough roads, which are in place for the benefit of all road users, are followed.

The public consultation asked the following questions in relation to the impact of the proposed changes would have on the respondents if they were to come into effect:

Question no.	Question text (summarised)	No. of responses
Q14	How would you be impacted if parking PCNs increased?	1,233
Q18	Impact on you if the additional parking fees increased?	1,074
Q22	Impact on you if the PCNs for bus lane and moving traffic offences increased?	1,143

The responses to the above three questions on 'impact' are covered in the section below under the sub-heading 'Public Consultation'.

London Councils recognises that the impact of these proposals may be felt hardest by those motorists on low incomes or facing economic hardship if caught contravening the rules and the current cost of living crisis. This may potentially impact disabled people on the grounds that the proposals would disadvantage those who may be more likely to require access to restricted areas within the borough road networks due to poor mobility.

London Councils has had to carefully balance these considerations against the wider benefits that the proposals are expected to deliver in terms of greater road safety, in turn reducing the disruption caused by poor parking and driving behaviours for all road users, as well as improving the accessibility and reliability of London's public transport networks.

6. Public Consultation

The public consultation on the London-wide proposals to increase all penalty charge levels and additional parking fees ran from 31 July to 23 October 2023. London Councils received a total of 2,034 responses to the consultation, of these, 1,914 were from members of the public, 25 were from the boroughs and 95 were from stakeholders.

A total of 26 questions were asked but it should be noted that although London Councils received a total of 2,034 responses, not all respondents contributed to every question.

A full copy of the Public Consultation report, with London Council's responses to the main findings, will be published on London Council's website in due course.

Respondents were asked whether any of the three main proposals would cause them any difficulties or hardship, or unfairly penalise any groups, as shown below:

Question no.	Question text (summarised)	No. of responses
Q14	How would you be impacted if parking PCNs increased?	1,233
Q18	Impact on you if the additional parking fees increased?	1,074
Q22	Impact on you if the PCNs for bus lane and moving traffic offences increased?	1,143

The public consultation responses/themes to each question are detailed in the tables below.

Question 14: How would you be impacted if parking penalty charges were to increase?

Of note:

One hundred and fifty-one respondents (12%) opposed any increases to the parking penalty charges based on affordability, whilst 144 respondents (12%) specifically referred to the cost of living crisis and high inflation as their main concern.

Twenty-seven respondents (2%) suggested the negative impact this may have on their mental health and creating a more stressful environment.

Of the 55 stakeholders that responded to this question, seven (13%) opposed the increase stating that it would have an adverse impact on their business and a further seven (13%) said that any increase in the penalty charges will be unaffordable .

Both Hackney and Southwark Living Streets charity groups supported this increase in parking penalty charges, stating that the roads throughout their boroughs would be much safer and more convenient to use for people walking, especially older and disabled people and people with young children, pushing buggies or using wheelchairs.

Theme	Code	Number	% out of 1233
Neutral - No Impact	Not impacted by the increase in charge	178	14%
Opposition - Financial	Concern that charges will be unaffordable	151	12%
Opposition - Financial	Concern that this is a particularly bad time due to cost of living and high inflation	144	12%
Support - Deterrent	Support the PCN increase to act as more of a deterrent and/or increase compliance	104	8%
Neutral - No Impact	Not impacted as rules would be followed	101	8%

Opposition - Financial	Concern about the reduced levels of income from fines	93	8%
Opposition - Financial	Concern about increased costs	91	7%
Opposition - Equality and Fairness	Concern about unfairness punishing a mistake/ unavoidable situation	87	7%
Support - Deterrent	Support improvements to quality and availability of parking	62	5%
Opposition - Financial	Concern that initiative is a 'money making' scheme	53	4%
Support - Road Safety	Support improved road safety	48	4%
Support - Deterrent	Fewer obstructions on roads and pavements due to higher compliance	40	3%
Opposition - Road Infrastructure	Concern about lack of adequate marking/signage	36	3%
Support - Sustainability	Support modal shift to sustainable transport modes	35	3%
Type of change	Visit London/area less frequently	35	3%
Opposition - Charging	Concern charges are already high enough	30	2%
Opposition - Charging	Against charge increases for parking	27	2%
Opposition - Equality and Fairness	Negative effect on mental health & more stressful environment	27	2%
Opposition - Equality and Fairness	Concern about impact on motorists (inc. anti-motorist sentiment)	26	2%
General	Negative Impact (general)	25	2%

Question 18: What would be the impact on you if the above fees were to increase?

'Fees' refers to the additional parking fees, specifically:

- Release from a wheel clamp
- Release from a pound
- Vehicle storage fees
- Vehicle disposal fees

Of note:

One hundred and fifty-five respondents (15%) raised concerns about the affordability of paying the increased fees, whilst 99 respondents (9%) specifically referred to the cost of living crisis and high inflation as their main concern.

Thirty-two respondents (3%) opposed the increases as they believed that this would unfairly penalise those that have made a genuine mistake or find themselves in a situation that is unavoidable.

Of the 54 stakeholders that responded to this question, seven (4%) opposed the increase stating that it would have an adverse impact on their business and a further six (3%) said that any increase in these additional parking fees will be unaffordable .

Both Hackney and Southwark Living Streets charity groups supported the increase in additional parking fees, suggesting that the roads, particularly footways, would be safer and more convenient to use for older and disabled people, wheelchair users, people pushing buggies etc, as there would be more resources for enforcement.

Theme	Code	Number	% out of 1074
Neutral – No Impact	Not impacted by the increase in charge (general)	247	24%
Concern – Financial	Concern about affordability/impact of cost	155	15%
Neutral – No Impact	Not impacted due to compliance/only impact those who do not comply	104	10%
Concern – Financial	Concern about impacts on cost of living and high inflation	99	9%
Support – Deterrent	Support acting as a greater deterrent and/or increased compliance	71	7%
Support – Deterrent	Support a reduction in illegal/dangerous parking	60	6%
Concern – Financial	Concern that initiative is a ‘money making’ scheme	48	5%
Opposition – Equality and Fairness	Concern about unfairly punishing a mistake/ unavoidable situation	32	3%
Concern – Financial	Suggestion that main impact is an increased cost	32	3%
General	General opposition to increased fees	29	3%
Support – Road Safety	Support improved road safety	23	2%
Opposition – Equality and Fairness	Concern about reduced quality of life	23	2%
Concern – Financial	Concern that fees are already too high	20	2%
Opposition – Traffic Impact	Concern about discouraging people from driving to/visiting London	19	2%
Opposition – Equality and Fairness	Concern about impact on vulnerable groups (i.e. elderly, disabled)	19	2%
Support – Governance	Support for recovering costs to councils to manage services	17	2%

Opposition – Equality and Fairness	Impact of discouraging people avoiding driving in the areas affected	17	2%
Support – Sustainability	Support for positive impacts on sustainable modes	16	2%
Opposition – Equality and Fairness	Concern about having to recover vehicle	16	2%
Opposition – Equality and Fairness	Concern that raising fees is unfair	13	1%

Question 22: What would be the impact on you if the penalty charges for bus lane and moving traffic contraventions were to increase?

Of note:

One hundred and seventy-two respondents (15%) raised concerns about the affordability of paying bus lane and moving traffic penalty charges at an increased level, whilst 115 opposed the increases as they believed that this would unfairly penalise those that have made a genuine mistake or find themselves in a situation that is unavoidable.

Fifty-nine respondents (5%) specifically referred to the cost of living crisis and high inflation as their main concern.

Of the 57 stakeholders that responded to this question, 7 (12%) opposed the increase stating that it would have an adverse impact on their business and a further four (7%) also sharing their concerns about being unfairly treated in case of genuine mistakes or unavoidable circumstances leading to a PCN.

Once again, Hackney and Southwark Living Streets charity groups supported the increase in bus lane and moving traffic penalty charges, suggesting that bus travel times would see an improvement and passengers would be less inconvenienced and suffer fewer delays due to obstructions caused by unauthorised motor vehicles driving in bus lanes and/or performing dangerous and banned manoeuvres on their borough network.

Theme	Code	Number	% out of 1143
Neutral - No Impact	Not impacted by the increase in charge (general)	212	19%
Opposition - Financial	Concern about affordability/impact of cost	172	15%
Opposition - Equality and Fairness	Concern about unfairly punishing a mistake/ unavoidable situation	115	10%
Support - Journey Times	Support given potential improvement to journey times	114	10%
Neutral - No Impact	Not impacted due to compliance/only impact those who do not comply	90	8%
Support - Deterrent	Support acting as a greater deterrent and/or increased compliance	85	7%

Opposition - Financial	Concern about impacts on cost of living and high inflation	59	5%
Support - Road Safety	Support improved road safety for cyclists/ pedestrians	58	5%
Opposition - Governance	Concern it is a 'money making' scheme	56	5%
Opposition - Financial	Concern about the reduced levels of income from fines	48	4%
Opposition - General	General concern about negative impacts	42	4%
Support - Traffic	Support improved congestion levels for drivers	36	3%
Opposition - Road Infrastructure	Concern about lack of adequate marking/signage	36	3%
Opposition - Equality and Fairness	Concern motorists are unfairly targeted	32	3%
Opposition - Equality and Fairness	Concern about increased stress/ anxiety over the risk of incurring fines	30	3%
Support - Deterrent	Support a reduction in dangerous driving	28	2%
Opposition - Traffic Impact	Concern charges will discourage people from driving to/visiting London/ living in London	24	2%
Opposition - Equality and Fairness	Concern about reduced quality of life	22	2%
Opposition - Governance	General opposition about governance from local councils/ London	21	2%
Opposition - Financial	Concern the current penalty is high enough	19	2%

Deterring non-compliance on the borough road networks should benefit all road users whether they live, work or are visiting London by reducing road danger, disruption, and congestion, and through these proposals, improve air quality.

While contraventions of the rules and regulations cause safety risks and disruption for all road users, they undoubtedly have a greater impact on disabled Londoners some of whom will be unable to use public transport and depend entirely on the use of a car and need easy access to parking bays and drop off areas safely.

The proposal in relation to an increase in the bus lane and moving traffic penalty charges are likely to have a positive impact on the reliability and accessibility of the London-wide bus network, which many disabled and older Londoners rely on to move around the Capital.

Health inequalities in London continue to be the widest of any English region and although the levels of health inequalities vary across the city, some groups in particular who are marginalised or socially excluded, experience some of poorest health problems commonly associated with air and noise pollution, and dangers on the roads. These groups include the

most vulnerable - children, older and disabled people, as well as those from Black, Asian and Minority Ethnic backgrounds.

All motorists are responsible for understanding and complying with the rules and regulations in accordance with the Highway Code as well as under various legislation that allows the boroughs to enforce parking, bus lane and moving traffic contraventions.

London boroughs ensure that signage and road markings are fit for purpose and clearly communicate what the motorist can and cannot do in relation to parking, loading, bus lane and moving traffic rules.

A penalty charge and any additional fees can be avoided by complying with essential rules which are in place for the safety and reliability of the borough road networks.

7. Impact on Protected Characteristic Groups as identified in the Equalities Act 2000

Equality Area	No adverse impact	Low adverse impact	Medium adverse impact	High adverse impact
Age	X			
Disability	X			
Gender reassignment	X			
Marriage and civil partnership	X			
Pregnancy and maternity	X			
Race	X			
Religion/belief	X			
Sex	X			
Sexual orientation	X			

6. Brief Summary of Reasons for Results:

Equality Area	Are any groups disproportionately impacted by the changes (who, how and why)?
Age	<p>No Adverse Impact</p> <p>Question 14 of the consultation asked respondents: "How would you be impacted if parking penalty charges were to increase?"</p> <p>Two out 1,233 (0.16%) of the responses to this question cited age as a factor that should be considered as a reason not to increase costs.</p> <p>We note that in total, 151 respondents (12.25%) made similar arguments about cost. Therefore, 1.32% of respondents who cited cost were concerned about the impact on older people.</p>

	<p>On balance, these figures do not suggest that consultees feel there is a disproportionate impact for people with this protected characteristic</p> <p>It should be noted also that two respondents (0.16%) felt that the measures would have positive benefits by making inconsiderate parking less likely, thereby having positive impacts for older people.</p> <p>Question 18 of the consultation asked respondents “What would be the impact on you if the (additional parking) fees were to increase?” one respondent out of 1,074 cited age as a concern as they may be more prone to making mistakes but supported harsher penalties for repeat offenders.</p> <p>Question 22 of the consultation asked respondents “What would be the impact on you if the penalty charges for bus lane and moving traffic contraventions were to increase?”, one respondent out of 1,143 cited age is a concern in terms of older people perhaps being intimidated by other drivers and therefore making genuine mistakes.</p> <p>London Councils notes that PCNs are only issued to motorists who contravene the regulations. No evidence has been presented during the consultation which suggests that people with this protected characteristic are more likely than the general population to receive a PCN.</p> <p>Furthermore, for those that do, mitigations exist. These include a 50% discount for early payment, the ability to make representations to the issuing authority to cancel PCNs that have been improperly issued, and ultimately, recourse to a tribunal to appeal the decision and have the opportunity for the charge to be cancelled.</p> <p>Additionally, PCN increase will offer a greater deterrent for motorists and reduce the number of contraventions. This will positively impact those of a more vulnerable age by reducing the number of safety issues associated with inconsiderate or dangerous traffic and parking behaviours – making the borough road networks safer, for all by reducing accessibility problems and risks, and improving reliability for public transport will also be realised as a result of compliance.</p> <p>Improved safety on borough road networks, including air quality and congestion, is likely to promote the health and wellbeing of all demographics including those with protected characteristics that live and work in London.</p> <p>On balance, London Councils considers that there is no direct adverse impact for people with this protected characteristic. Any indirect impact will only be for the relatively small number of individuals (as a proportion of the 2 billion journeys taken each year) who receive notices (which can be avoided). These indirect impacts are far outweighed by the positive impact on improved parking behaviours.</p>
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<p>Disability</p>	<p>No Adverse Impact</p> <p>Question 14 of the consultation asked respondents: “How would you be impacted if parking penalty charges were to increase?”</p> <p>Five out 1,233 (0.22%) of the responses to this question cited disability as a factor that should be considered as a reason not to increase costs.</p> <p>We note that in total, 151 respondents (12.25%) made similar arguments about cost. Therefore, 3.31% of respondents who cited cost were concerned about the impact on disabled people.</p> <p>On balance, these figures do not suggest that consultees feel there is a disproportionate impact.</p> <p>It should be noted also that two respondents (0.16%) felt that the measures would have positive benefits by making inconsiderate parking less likely, thereby having positive impacts for disabled people.</p> <p>Question 18 of the consultation asked respondents “What would be the impact on you if the (additional parking) fees were to increase?”</p> <p>Three out 1,074 (0.28%) of the responses to this question cited disability as a factor that should be considered when making any decisions on the actual removal of vehicles, of which one respondent said that although they abide by the rules and regulations, they would struggle to get to a vehicle pound.</p> <p>Question 22 of the consultation asked respondents “What would be the impact on you if the penalty charges for bus lane and moving traffic contraventions were to increase?”</p> <p>Out of 1,143 respondents, no one expressly mentioned disability as a factor but there was support of 10% in total for this increase to help improve the public transport journey times and with a total of 5% of all respondents suggesting that an increase in PCNs would minimise dangerous driving behaviours that has an adverse effect on all road users, by improving road safety.</p> <p>London Councils notes that PCNs are only issued to motorists who contravene the regulations. No evidence has been presented during the consultation which suggests that people with this protected characteristic are more likely than the general population to receive a PCN.</p> <p>Furthermore, for those that do, mitigations exist. These include a 50% discount for early payment, the ability to make representations to the issuing authority to cancel PCNs that have been improperly issued, and ultimately, recourse to a tribunal to appeal the decision and have the opportunity for the charge to be cancelled.</p> <p>Additionally, PCN increase will offer a greater deterrent for motorists and reduce the number of contraventions. This will positively impact on</p>
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	<p>motorists with a disability, as parking and traffic compliance will improve and deter inconsiderate and dangerous parking and driving behaviours. This will also reinforce the correct use of Disabled parking bays, whilst those with severe mobility difficulties and require the use of a wheelchair or walking aid will benefit from a reduction in footway parking contraventions.</p> <p>Although those with a Blue Badge (or the equivalent in certain boroughs), may still receive a penalty charge for improper use, this is not deemed to have a disproportionate impact. There is no evidence to suggest that Blue Badge holders are less able to abide by restrictions than non- disabled drivers who might contravene the restrictions.</p> <p>Improved safety on borough road networks, including air quality and congestion, is likely to promote the health and wellbeing of all demographics including those with protected characteristics that live and work in London.</p> <p>On balance, London Councils considers that there is no direct adverse impact for people with this protected characteristic. Any indirect impact will only be for the relatively small number of individuals (as a proportion of the 2 billion journeys taken each year) who receive notices (which can be avoided). These indirect impacts are far outweighed by positive impact on improved parking behaviours.</p>
Gender reassignment	<p>No Adverse Impact - not cited by any respondents.</p> <p>Improved safety on borough road networks, including air quality and congestion, is likely to promote the health and wellbeing of all demographics including those with protected characteristics that live and work in London.</p>
Marriage and civil partnership	<p>No Adverse Impact - not cited by any respondents.</p> <p>Improved safety on borough road networks, including air quality and congestion, is likely to promote the health and wellbeing of all demographics including those with protected characteristics that live and work in London.</p>
Pregnancy and maternity	<p>No Adverse Impact - not cited by any respondents.</p> <p>Improved safety on borough road networks, including air quality and congestion, is likely to promote the health and wellbeing of all demographics including those with protected characteristics that live and work in London.</p>
Race	<p>No Adverse Impact - not cited by any respondents.</p> <p>Improved safety on borough road networks, including air quality and congestion, is likely to promote the health and wellbeing of all demographics including those with protected characteristics that live and work in London.</p>
Religion/belief	<p>No Adverse Impact - not cited by any respondents.</p>

	Improved safety on borough road networks, including air quality and congestion, is likely to promote the health and wellbeing of all demographics including those with protected characteristics that live and work in London.
Sex	No Adverse Impact - not cited by any respondents. Improved safety on borough road networks, including air quality and congestion, is likely to promote the health and wellbeing of all demographics including those with protected characteristics that live and work in London.
Sexual orientation	No Adverse Impact - not cited by any respondents. Improved safety on borough road networks, including air quality and congestion, is likely to promote the health and wellbeing of all demographics including those with protected characteristics that live and work in London.

In addition to the above and as previously stated, 'income' is not a protected characteristic, although age, disability and race are strongly linked to those having lower incomes.

However, a number of respondents including stakeholders to London Councils' public consultation raised concerns about rising costs/cost of living crisis and affordability and being negatively impacted by the proposed changes in the event they receive a PCN and any additional fees.

London Councils accepts that a small minority of motorists fail to follow the parking and traffic regulations, which is why enforcement is necessary to encourage all motorists to drive and park in a considerate and safe manner.

Ninety-five per cent of the road network in London is managed by the boroughs, and with around two billion car journeys made each year, parking and traffic management is integral to maintaining the movement of traffic and safety of all road users.

Any form of enforcement that involves penalties is meant to act as a deterrent, encourage positive behaviour change and increase compliance. Therefore, the PCNs are set at a level that makes the borough road networks safer, for all London residents and visitors.

For those motorists with protected characteristics from socio-economically deprived communities that do contravene the rules and regulations, the introduction of an increased PCN value and increased additional parking related fees is mitigated by the following:

- A PCN is only issued to motorists that have failed to follow the parking and traffic regulations and will be reduced by 50% if paid within 14 days.
- A motorist also has the right to appeal a PCN to an independent adjudicator if they feel that it was unfairly issued.

In addition, we note that improved safety on borough road networks, including air quality and congestion, is likely to promote the health and wellbeing of all demographics including those with protected characteristics that live and work in London, including those from low-income backgrounds.

7. Stakeholder Engagement :

A wide range of sources including Census 2021, TfL and GLA data and research provided an understanding of:

- the distribution of people with protected characteristics and socio-economically deprived communities across Greater London
- the current use of different modes of transport, by people with protected characteristics

London Councils will work closely with a number of internal and external stakeholders:

- Communication and Media Team
- Corporate Management Team
- City of London Legal
- Finance
- 32 London Boroughs
- City of London
- Transport for London
- Department for Transport
- Greater London Authority

A public consultation takes place between 31 July 2023 and 23 October 2023.

8. Conclusions:

- Continue with the current Band A and Band B two-tier regime in London
- Introduce an increase of 23% equivalent to TfL for Higher Level PCNs whilst keeping the £50 difference between Higher and Lower Level PCNs as the same.
- Introduce an increase of 43.6% in line with inflation since 2011 to September 2024 for all the other additional parking fees
- Discount and surcharge rates remain at 50%.

Relevance assessment completed by:

NAME: Mital Patel

DIRECTORATE/DIVISION: Transport & Mobility

DATE: 30 July 2023

MAYOR OF LONDON

Rt Hon Heidi Alexander MP
Secretary of State for Transport
c/o DfT.Ministers@dft.gov.uk

Our ref:

Date:

Dear Heidi,

The Civil Enforcement of Road Traffic Contraventions (Approved Devices, Charging Guidelines and General Provisions) (England) Regulations 2022 provide that the functions of London local authorities in relation to parking contraventions, as set out in the Traffic Management Act 2004 (the TMA 2004) Part 2, Schedule 9, are to be exercised by those authorities jointly, by means of a single joint committee – namely, London Councils' Transport and Environment Committee (TEC). TEC is responsible for setting enforcement charges on borough roads only. It is also responsible for:

- setting penalty levels in respect of bus lane contraventions (under the London Local Authorities Act 1996 (LLA Act 1996))
- setting penalty levels in respect of moving traffic contraventions; one-way streets; banned turns and yellow box junctions, etc (under the LLA Act 1996, and the London Local Authorities and Transport for London Act 2003 (LLA and TfL Act 2003))
- setting penalty levels in respect of the London Lorry Control Scheme (under the LLA Act 1996 and the LLA and TfL Act 2003)
- setting the discount rate which applies to the early payment of all penalties within 14 days of issue, and the rate of surcharge for parking contraventions (under the TMA 2004), which applies to the late payment of penalties.

London Councils has notified me of proposed changes to the above charges. Proposals to change the levels of charges are subject to my approval, as per the TMA 2004, Part 2, Schedule 9, paragraph 3. Having now considered the request – received from London Councils in December 2024 – and given it my approval, I am required by the TMA 2004, Part 2, Schedule 9, Paragraph 4 to notify you of the proposal, and I hereby do so. The proposal from London Councils is for the following increases to be made:

- parking penalty charge levels for both Band A and Band B charging regimes, for both the higher and lower-level contraventions, which are only applicable to on and off-street parking contraventions:
 - Band A: higher level, from £130 to £160; and lower level, from £80 to £110

MAYOR OF LONDON

- Band B: higher level; from £110 to £140; and lower level, from £60 to £90
- bus lane and moving traffic penalties: from £130 to £160
- charges for vehicle removal, clamping, storage, and disposal:
 - release fee from wheel clamp: from £70 to £100
 - release fee from car pound: from £200 to £280
 - daily storage fee from: £40 to £55 per day
 - disposal fee from: £70 to £100.

The increased levels of charges do not come into force until the either one month has passed from the date on which the notification is given (the date of this letter), or such shorter period as you may allow. You may, before the end of that period, give notice to me that you object to the levels of charges, on the grounds that some or all of them are excessive. If you do so, those levels of charges shall not come into force unless and until the objection has been withdrawn. If at any time before the charges have come into force you consider that some or all of them are excessive, you may make regulations setting the level of charges.

I have attached my approval Decision with supporting documentation for your information.

Yours sincerely,

Sir Sadiq Khan
Mayor of London