

London Councils' Transport and Environment Committee

Additional Parking Charges for the London Borough of Merton

Item No:

Report by: [REDACTED] **Job title:** Transport Officer
Date: 15 October 2020
Contact Officer: [REDACTED]
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Summary: This report details the proposal by the London Borough of Merton (LB Merton) to amend the penalty charge banding from Band B to Band A across the borough.

Recommendations: The Committee is asked to:

- Approve the proposal to change the penalty banding in the LB Merton
- Note the proposed implementation date for the change of 1 January 2021.

Introduction:

1. Under the provisions set out in the Traffic Management Act 2004 (Schedule 9), which repealed similar provisions in the Road Traffic Act 1991, London Councils' Transport and Environment Committee is responsible, subject to agreement by the Mayor of London and possible veto of the Secretary of State, for setting additional parking charges on borough roads. These additional parking charges include:
 - penalties for contraventions of parking regulations including any surcharges or discounts;
 - release from wheel clamps;
 - removals from the street;
 - storage charges and disposal fees
2. The discount payment rate for early payment has been set at 50%. The amount of any surcharge has not changed since this was set at 50% by Schedule 6(6)(1) of the Road Traffic Act 1991.

3. The Committee has reviewed the level of additional parking charges regularly since 1992, when they were first set. The Committee undertook a major review of the charges during 2006 which led to the introduction of differential penalty levels, and again in 2010 where there was an increase in the penalty levels for the more serious contraventions. The current on and off-street parking penalty charges are as follows:

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

4. The current London banding map can be seen in *Appendix 2*. Band A areas have traditionally been focussed in Central London and urban centres where the pressures on parking and congestion are often greatest. Band B areas have historically concentrated in outer London where pressures on parking are not as significant. However, due to issues with non-compliance, some outer London authorities with higher density parking and significant Controlled Parking Zones (CPZs) have become Band A areas. Higher level penalties apply to contraventions which are considered more serious, such as parking on yellow lines or where an obstruction is caused. Lower level penalties apply generally where parking is permitted but the regulations are contravened, such as overstaying on a pay and display bay.
5. London Councils has no current plans for a London-wide review of the additional parking charges.

Guidance on Additional Parking Charges:

6. Under the Traffic Management Act 2004 the Secretary of State produced guidance, to which all authorities must have regard. This document is titled the Secretary of State's Statutory Guidance to Local Authorities on the Civil Enforcement of Parking Contraventions ("the Statutory Guidance") and 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." (Para. 4.1).
7. It is also the Committee's policy that additional parking charges should be set in such a way as to produce a coherent pattern of policy across London.

LB Merton Proposals for Change:

8. LB Merton is proposing to change from being Band B to Band A across the whole borough (*please see Appendix 1 of this report for full details*).
9. The borough comprises of 63 CPZs which equates to 30% of the borough road network, with further loading and waiting restrictions strategically placed at various locations outside of the CPZs. Merton also manages and enforces 14 off-street Town Centre car parks as well as School Keep Clears, Footway Parking and Disabled Bays.
10. Merton has indicated that despite deploying a robust parking and traffic enforcement regime - which includes 33 in-house, on-street Civil Enforcement Officers on foot, two mobile CCTV units and a network of Automated Number Plate Recognition cameras for

Bus Lane and Moving Traffic Contraventions the borough continues to experience an increase in levels of non-compliance with its parking regulations.

11. *Appendix A, Table 1* contained within LB Merton's application (*please see Appendix 1 of this report*) indicates that between 2015/16 and 2018/19, the total number of on-street parking Penalty Charge Notices (PCNs) issued each year has increased from 54,018 to 68,524 which equates to a 27% increase. In 2019/20, the number of PCNs has seen a decline but this can be attributed to Merton implementing a new 'virtual' permit system in January 2020 which encountered some technical issues at the start of the year and then later, due to the pandemic and lockdown in March 2020.
12. *Appendix A, Table 2* (*please see Appendix 1 of this report*) contained within LB Merton's application illustrates that over the last five years from 2015/16 to 2019/20, the average percentage of PCNs issued at the higher level of the Band B bracket is at 63% as opposed to 37% at the lower level Band B bracket, indicating that LB Merton is experiencing a higher level of non-compliance in their borough.
13. It should also be noted that the Government restriction on the use of CCTV enforcement for parking contraventions under the Deregulation Act 2015 has presented an increased risk of potential non-compliance. LB Merton believes that some of this risk can be countered with a change to the penalty band which increases the deterrent.
14. LB Merton has stated that London - as a city - is to see a growth in population to 10 million and despite many new developments within the borough being car-free, this growth will lead to an increase in traffic, parking demands, congestion on borough roads and contributing to poor air quality. LB Merton believe that it is essential to improve compliance with its parking regulations and banding changes have been a proven method to achieve this.
15. It is TEC's policy that the boundaries between areas of different penalty bands are clearly demarcated; this is to avoid the possibility of having different bands on opposing sides of the same road or in the same street. Those roads that have signs clearly identifying that the driver has entered LB Merton, where the boundary crosses the road, are not affected and can be enforced as Band A. Those without borough identifiers will need to remain Band B. LB Merton has boundaries with LB Croydon, RB Kingston, LB Lambeth, LB Sutton and LB Wandsworth. There are a number of boundary locations in RB Kingston, LB Lambeth, LB Sutton and LB Wandsworth where LB Merton will need to continue enforcing Band B and are listed in LB Merton's application under Appendix H (*please see Appendix 1 of this report*).
16. LB Croydon is already Band A, so any shared boundaries with LB Merton will not impact the ability for LB Merton to enforce Band A.
17. Any boundary roads in LB Croydon that are currently being enforced as a Band B due to a boundary with LB Merton will be enforceable as a Band A once final approval has been received and the new banding regime commences.

Timetable for Implementation

18. Any changes to penalty levels agreed by the Committee need the approval of the Mayor. If the Mayor agrees the changes the Secretary of State has 28 days to exercise a veto over any changes. The committees' decisions will be formulated into a set of proposals to be presented to the Mayor of London for approval. If approved, they will be presented to the Secretary of State for Transport for their consideration in the New Year. The boroughs involved would then need to advertise their proposed changes for at least three weeks prior to implementation. From previous experience, this process takes around three months in total, and so London Councils propose an implementation date of 1 January 2021.

Financial Implications

19. There are no financial implications for London Councils arising from this report.

Legal Implications

20. There are no legal implications for London Councils or the boroughs arising from this report. However, members may wish to note the decision on penalties is taken by London Councils' TEC on behalf of boroughs for borough roads, and by TfL for GLA roads. The TfL member of London Councils' TEC may not take part in the proceedings of the borough decision (see Reg. 24 of the Civil Enforcement Parking Contravention Regulations 2007).

Equalities Implications

21. There are no equality implications for the boroughs or London Councils arising from this report.

Recommendations: The Committee is asked to:

- Approve the proposal to change the penalty banding in the LB Merton
- Note the proposed implementation date for the change of 1 January 2021

Appendices

Appendix 1: LB Merton application to change the banding level from Band B to Band A.
Appendix 2: Existing on and off-street penalty charge bands
Appendix 3: List of LB Merton boundary roads with neighbouring boroughs.

Appendix 1: LB of Merton's application for Additional Parking Charges



ENVIRONMENT AND REGENERATION DEPARTMENT
Chris Lee - Director

CATHRYN JAMES – HEAD OF PUBLIC PROTECTION

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Reference: ER/PPD/PS/ABAPP21920

Date: 21 September 2020

Dear Mr Palmer,

Application to amend the Penalty Charge Notice banding in the London Borough of Merton

The London Borough of Merton (Merton) are seeking approval from London Councils' Transport and Environment Committee (TEC) to introduce a uniform Band A charging level across the whole of the borough for all on and off-street Penalty Charge Notices (PCNs).

Please therefore accept this letter and accompanying appendices as a formal application to amend the PCN banding in Merton to be a borough-wide Band A charging level, with the exception of those boundary roads listed in *Appendix H*.

The current position in Merton is that approximately all the borough road network is subject to Band B charging levels. As advised above, this application seeks to obtain approval to introduce a uniform borough-wide Band A charging.

The evidence and reasoning for this change is set out below.

Background:

Historical Enforcement Data

Merton currently enforces on and off-street parking, bus lane and moving traffic contraventions. To allow for comparison, all PCN figures referenced in *Appendix A* relate only to those PCNs issued directly by an on-street Civil Enforcement Officer (CEO), as do any references to PCNs in this section. These figures do not include PCNs issued for bus lane or moving traffic contraventions.

Over the last five years (2015/16 to 2019/20), Merton has seen a rise in parking contraventions which has resulted in overall increase in the number of PCNs being issued.

A review of the PCNs issued in 2018/19 show that approximately 72% of the total number of PCNs issued in that financial year were issued to vehicles that are not registered to a Merton address.

The recent application to London Councils' TEC Committee from the Royal Borough of Greenwich shows that during the financial years 2015/16 – 2018/19, London has seen a 13.6% increase in the number of PCN's issued during this period and during this same period, Merton experienced a 26.9% increase in levels of non-compliance, significantly higher than the overall London trend.

Table 1 below shows an overall increase of 7.7% in PCNs over the last five years.

Table 1: PCNs issued in Merton (Parking PCNs only)

Year	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020
Total	54,018	66,489	66,755	68,524	58,174

In January 2020, Merton moved from the 'Imperial Gateway' permit system to the 'RingGo' *virtual* permit system. As a result of some technical issues during the roll-out of this system, there were a number of on-street contraventions that the borough were unable to enforce as the relevant permit information was not being transferred successfully from the RingGo permit system to the Imperial 3sixty PCN notice processing system.

Then in March 2020, PCNs issuance levels were affected by COVID-19 as traffic began to significantly reduce, which explains the fewer number of PCNs issued for that year. (This has also affected the number in 2020/21 for a temporary period but is now returning to pre-COVID-19 levels of non-compliance.)

Current Position

Within Merton, there are 63 Controlled Parking Zones (CPZs), comprising 30% of the borough's road network and in addition to this, the borough manages and enforces 14 off-street Town Centre car parks. Outside of the CPZs, there are waiting and loading restrictions in place, as well the enforcement of blocked driveways and footway parking.

Over the years, Merton has had to deploy more enforcement resources in order to address the growing issue of non-compliance.

In addition to the increase in the number of PCNs being issued, it is also relevant to note that in the period from 2015/16 to 2019/20, the percentage of PCNs which were issued at the higher level (£110.00) has remained consistently higher than the number of lower level (£60.00) PCNs issued in the same period.

This is a clear indication that the charge associated with these PCNs, is not a successful deterrent and as a result, the increased number of PCNs issued each year demonstrate that the current Band B charges, in conjunction with a robust enforcement regime are not encouraging improved compliance.

Table 2 below shows that during 2015/16 and 2019/20, the average percentage of PCNs issued for higher level parking contraventions is 63% of the total PCNs issued.

Table 2: Merton Higher and Lower PCNs issued

Year	2015/16	2016/17	2017/18	2018/19	2019/20	Average	%
Higher	43,152	41,319	38,598	40,200	35,003	39,654	63%
Lower	10,866	25,170	28,157	28,324	23,171	23,138	37%
Total	54,018	66,489	66,755	68,524	58,174	62,792	100%

Further to the provisions of the Traffic Management Act 2004 (TMA), the primary purpose of penalty charge levels is to encourage compliance and as such, banding levels should be set accordingly.

Based on the evidence set out in this application, it is considered that Band B charging in Merton no longer reflects the actual situation, which continues to persist, namely higher levels of non-compliant parking each year.

It should also be noted that the immediate effect of the Coronavirus pandemic (COVID-19) and the lockdown, has meant that enforcement authorities have issued significantly fewer PCNs during March 2020 and the first quarter of 2020/21, however with the significant reduction in capacity available on all forms of public transport, in conjunction with increased use of personal vehicles, as well as repurposing parts of the road to enable social distancing, it is expected that there will be increased demand for parking, both on and off -street, and as a result of this, an increase in the number of illegally parked vehicles.

The purpose of any enforcement regime is to ensure the free flow traffic through the area while ensuring there is a good turnover of the available parking, while at the same time contributing to driver and pedestrian safety. Illegally parked vehicles reduce both driver and pedestrian safety by impacting on drivers' line of sight vision and in other cases, illegally parked vehicles may endanger other drivers and pedestrians seeking to get past.

Planning policy is used to minimise additional parking pressures arising from developments in some areas, with many multi-dwelling developments being granted planning permission on the basis that the development will be car free i.e. the residents of the development will not be eligible to purchase permits for use within the CPZ.

Merton's in-house enforcement regime consists of 33 Civil Enforcement Officers, deployed in mobile enforcement units and on-foot. In addition, the borough has a network of Automatic Number Plate Recognition (ANPR) cameras that are strategically placed throughout the borough to enforce a range of moving traffic and bus lane contraventions and two mobile CCTV units.

The Deregulation Act (2015) which restricted the use of CCTV for the majority of parking contraventions meant that Merton had to employ a more robust parking and traffic enforcement regime, but despite this, the borough continues to experience high levels of non-compliance.

Public Consultation Results

It is considered that the information provided in this application sets out a compelling justification for Merton to be granted with a borough wide Band A status. However, it was considered that the views of the Merton residents, visitors and those who work in the borough should be sought prior to the application being made to TEC.

As part of the consultation, interested parties (*see Appendix A*) were invited to complete an online questionnaire which ran from 16 March 2020 to 28 June 2020. A total of 389 responses to the online questionnaire were received and have been detailed in the Consultation Analysis in *Appendix B* to *Appendix C* and *Appendix D* shows screenshots of the online and social media engagement carried out.

Table 3 below outlines the timescales and framework of activity conducted by Merton in order to consult on the proposal of a band change within the borough.

Table 3: Framework of Activity

Date:	Activity:	Comments:
13 Mar 2020	Consultation emails sent to the statutory consultees (see Appendix A, Table 1)	16/03/2020: One response from LB of Sutton's Parking Contract Manager stating "No objection"
16 Mar 2020 to 1 May 2020	Proposal to consult published in the London Gazette and Wimbledon and Wandsworth Times	
28 Apr 2020 to 1 May 2020	Resident Associations (see Appendix A, Table 2) were sent an email informing them of the consultation	
29 April 2020 to 6 May 2020	Equality Groups (see Appendix A, Table 4) were sent an email advising them of the proposal and the email included the link to the consultation	
1 May 2020	Resident Associations were sent a letter advising them of the proposal and included the link to the survey as there were no email addresses held for them (see Appendix A, Table 3)	
7 May 2020	Further notice was advertised in the London Gazette and the Wimbledon and Wandsworth Times extending the consultation deadline to 31 May 2020.	
7 May 2020	Further consultation emails were sent to the statutory consultees (see Appendix A, Table 1)	12/05/2020: One response on from LB of Croydon stating "No objection as they already apply PCN Band A levels"
2 June 2020 to 5 June 2020	One follow-up telephone call was made to each Equality Group (where possible) to ensure they were aware/remind the group of the proposal and the consultation	
4 June 2020	A further notice was advertised in the London Gazette and Wimbledon and Wandsworth Times, extending the	05/06/2020: One response from the Metropolitan Police

	consultation deadline to 28 June 2020.	stating "No objection or observations to add"
4 June 2020	Further consultation emails were sent to the statutory consultees (see Appendix A, Table 1)	
4 June 2020 to 5 June 2020	Resident Associations (see Appendix A, Table 2) were sent a further email advising them of the proposal and included the link to the consultation	
4 June 2020	Resident Associations were sent a reminder letter further advising them of the proposal and included the link to the consultation as there were no email addresses held for them (See Appendix A, Table 3)	
4 June 2020 to 9 June 2020	Equality Groups (see Appendix A, Table 4) were sent a reminder email further advising them of the proposal and the email included the link to the consultation.	
9 June 2020 to 17 June 2020	Carried out Twitter and Facebook engagement (see Appendix D of screenshots)	

The consultation results show that overall, 27.5% of respondents agreed that an increase in the cost of a PCN is an effective way of discouraging inconsiderate parking and with 22% of respondents agreeing to the proposal of a change in Merton's PCN band charges.

Although only 45% of overall respondents agreed that more should be done to enforce parking restrictions, when given the opportunity to comment further, in excess of 50% of these respondents cited that additional enforcement as being the most appropriate solution to resolving the problem.

COVID-19

The impact of the COVID-19 lockdown on personal travel habits has yet to be fully realised as many organisations adjust to remote working practices.

However, as a result of COVID-19, there is a reduced capacity on public transport, with many individuals choosing to use personal transport, where before they would have used public transport for their commute. In response to this, Merton have published a COVID-19 Transport Strategy. The plan is focused on making changes to roads and pavements in the borough to improve road safety, support social distancing and provide more space for walking and cycling.

Pavements have been extended into the road at some of the busiest parts of the borough such as town centres and local shopping parades, which may result in a reduction in the number of available on-street parking bays at these locations.

The emergency changes will be followed by longer term work to improve walking and cycling routes throughout the borough, including the introduction of 26 School Safety Zones from September 2020. The plans will also look to keep Merton moving safely as travel patterns change and restrictions ease.

Future Borough Growth

Parking enforcement, whilst highly contentious, is an essential element of improved road safety for all road users and pedestrians in the borough.

Over the coming years, it is estimated that London's population will grow to ten million. It is inevitable that, despite many new developments in Merton being car free, this will in turn lead to more traffic (as not all traffic on Merton's roads originates from within Merton), increasing stress on the borough's main roads, extending journey times, worsening bus reliability, and contributing to poor air quality.

Improved compliance is essential to support many of Merton's objectives, including encouraging a greater uptake on sustainable forms of transport, helping to improve air quality and improving journey times.

It is also expected that improved compliance, as a result of increasing the PCN band charges will result in:

- Fewer cars parked on single and double yellow lines, resulting in safer roads
- Fewer cars parked on pavements and at other unauthorised locations
- Fewer cars 'overstaying' at on and off-street pay and display locations

Resulting in a better turnover of spaces for visitors to Merton's town centres and less congestion from cars 'circling' and looking for available parking.

In the wake of COVID-19, which has resulted in the significant reduction in capacity on public transport networks and increased use of personal vehicles for commuting and leisure, as well as the re-purposing of some on-street bays as footway to enable social distancing and support active forms of travel, increased compliance is necessary to support these issues.

Borough Boundary Roads

Merton has boundaries with the London Boroughs of Sutton, Croydon, Lambeth, Wandsworth and the Royal Borough of Kingston upon Thames.

The London Borough of Croydon issue PCNs at Band A charges borough wide, and have roads shared with Merton.

Appendix 2 of this report sets out the roads that border with the above-mentioned authorities where Merton will continue to enforce Band B charging levels.

TEC are asked to note that Merton will be fully compliant with London Councils recommendations that certain borough boundary roads will need to remain as Band B locations in order to maintain consistency of enforcement and to avoid the possibility of differential bandings/charging levels on opposing sides of the same road.

Summary

- In July 2020, a total of 5,323 PCNs were issued for parking contraventions on and off-street, compared to 5,775 in July 2019, indicating the number of parking contraventions is rapidly returning to pre- COVID-19 levels.
- Increased enforcement has not only resulted in a rise in PCNs issued but it has also highlighted that higher level contraventions are approximately double that of lower level contraventions.
- It is considered that an increased level of penalty charge can act as a deterrent and it is for this reason that a borough-wide Band A charging is being sought, as a means

to improve parking compliance, reduce congestion, improve air quality and road safety concerns within the London Borough of Merton.

- Merton carried out a robust public consultation exercise, the results of which support the introduction of Band A charging across the whole borough.

Conclusion

It is requested that TEC approve this application and agree to allow Merton's PCN banding levels to be changed from Band B to Band A.

Subject to TEC's approval and ratification from the Greater London Authority and the Secretary of State, it is proposed that a borough-wide Band A level would be introduced from 1 January 2021, providing this matter can be presented at the October TEC meeting, if not, it is proposed that these charges would be introduced in April 2021.

If you have any queries regarding this application or require any further information, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Chris Lee', with a stylized, cursive script.

Chris Lee
Director – Environment and Regeneration

Appendix A: Proposal to change PCN Band B to A – Consultees

Table 1: Statutory Consultees

1	Metropolitan Police
2	London Fire Brigade
3	London Ambulance Services
4	AgeUK Merton
5	The Automobile Association
6	The British Motorcycle Federation
7	The Confederation of Passenger Transport
8	The Freight Transport Association
9	Friends of the Earth
10	The London Taxi Drivers Association
11	London Travel Watch
12	Merton Community Transport
13	The Road Haulage Association
14	Royal Mail
15	TrafficMaster
16	Transport for London (TfL)
17	TfL buses
18	London Borough of Croydon
19	Royal Borough of Richmond upon Thames
20	London Borough of Lambeth
21	London Borough of Sutton
22	London Borough of Wandsworth

Table 2: Residents Associations consulted via email

1	Mitcham Cricket Green Community & Heritage Trust
2	Mitcham Village Residents Association
3	Ravensbury Residents Association
4	Willow Lane Action Group
5	Longthornton and Tamworth Residents' Association
6	Mitcham Society
7	Parkside Residents Association
8	Wimbledon East Hillside RA (WEHRA)
9	Willmore End Residents Association
10	Love Wimbledon BID
11	Bathgate Road Resident Association
12	Belvedere Residents Association
13	Community of Woodside Area Residents Association (CWARA)
14	Florence Road Residents Association
15	High Path Community Association
16	Edge Hill Area Residents Association

17	Merton Park Ward Residents Association
18	Somerset Road Residents Association
19	South Common Residents Association
20	St John`s Area Residents` Association
21	Wimbledon Common West Residents Association
22	Wimbledon Park Residents Association
23	Wimbledon Society
24	Wimbledon Union of Residents Association
25	Amity Grove Residents Association
26	Apostles Residents Association
27	Durrington Avenue and Park Residents Association
28	Four Acres and Edinburgh Court Residents Association
29	NW Wimbledon Residents Association
30	Raynes Park and West Barnes Residents Association
31	Raynes Park Association
32	Residents Association of West Wimbledon
33	South Ridgway Residents Association
34	New Belvederer Residents Association
35	Haydon's Road North Residents Association
36	Sadler Close Residents Association.

Table 3: Resident Associations consulted by letter

1	South Mitcham Residents Association
2	Baron Estate Residents Association
3	Pollards Hill Residents Association
4	Wimbledon Almshouse Residents Association
5	Alfreton Close Residents Association
6	Queens Road Residents Association
7	Ridgway Place Residents Association
8	Burstow Road Residents Association

Table 4: Equality Groups consulted

1	Wimbledon Guild
2	Age UK Merton
3	Polish Family Organisation
4	BAME
5	BAME Voice
6	Carers Support Merton
7	Ethnic Minority Centre
8	Merton and Morden Guild

9	Merton CIL
10	Merton Seniors Forum
11	Merton Vision
12	Merton CAB
13	Merton Mencap
14	Wimbledon and District NCT Group
15	Merton Voluntary Sector Compact (MVSC)

Appendix B: Consultation Analysis

389 responses were received in total.

Analysis of the responses to each question is provided below.

How do you travel around Merton?

- 86% (336 respondents) said they drive a motorised vehicle; 53% of these drivers park their vehicle in Merton on a daily basis. The majority of those driving in the borough either live or both live and work in Merton (in total 96% of the drivers who responded). Only 4% of respondents who either work in the borough or neither work or live in the borough said they drive in Merton.
- 69% of respondents walk
- 56% use public transport
- 30% bicycle
- 25% are passengers of a motorised vehicle
- 17% of respondents use taxis/black cabs
- 5% were motorbike/scooter users
- 2% said other (wheelchair/mobility scooter/non-motorised scooter/Zipcar)

What is the main reason you drive in Merton?

The top three answers were:

1. 47% Leisure/Social
2. 16% Work/Business
3. 15% Commuting from Merton to another destination

Where do you park most often in Merton?

- 35% Residents Permit Zone
- 30% On-street for Free
- 15% Paid-for car park
- 13% Pay and Display spaces

Please tell us to what extent do you agree or disagree more should be done to improve traffic flow in Merton?

(For all agree/disagree questions, the responses combine the 'strongly agree' and 'agree' figures and the 'strongly disagree' and 'disagree' figures.)

- 72% agreed
- 23% disagreed
- 5% didn't know

71% of respondents who live in the borough agreed with this statement and 83% of respondents who both live and work in the borough agreed.

The percentage of those who work in the borough agreeing, was slightly lower at 66%, whilst 86% of those who neither live nor work in the borough agreed.

Those who said they have a disability were also more likely to agree, with 83% saying more should be done compared to 72% of those who said they do not consider themselves to have a disability.

Please tell us to what extent do you agree or disagree inconsiderate parking adds to congestion?

- 63% agreed
- 32% disagreed
- 5% didn't know

Please tell us to what extent do you agree disagree inconsiderate parking makes roads in Merton more dangerous?

- 60% agree
- 36% disagree
- 4% didn't know

Please tell us to what extent do you agree or disagree more should be done to enforce parking rules in Merton?

- 45% agreed
- 50% disagreed
- 5% didn't know

Interestingly, there was not a huge divide here between how drivers in Merton responded and those who use other ways to get around the borough, e.g. 43% of drivers agreed and 52% of them disagreed (the rest didn't know), compared to 45% of those who walk agreeing and 50% of walkers disagreeing.

50% of public transport users in the borough agreed, whilst 45% of them disagreed.

What types of parking enforcement do you think are most important?

Top four responses were:

1. 65% School zigzag lines
2. 54% Double yellow lines
3. 42% Disabled bays
4. 40% Pavement parking

To what extent do you agree or disagree that increasing the amount of the Penalty Charge Notice (parking ticket) is an effective way of discouraging inconsiderate parking?

- 27.5% agreed
- 66.5% disagreed
- 7% didn't know

Again, although the percentage of drivers agreeing was lower than those using other modes of transport to get around – there was not a marked difference in how people who use different travel modes responded, for example:

- 24% of drivers agreed whilst 58% disagreed
- 31% of walkers agreed whilst 61% disagreed
- 36% of cyclists agreed whilst 56% disagreed

To what extent do you agree or disagree with the proposal to change Merton's Penalty Change Notices from Band B to Band A?

- 22% agreed
- 65% disagreed
- 13% didn't know

As with the above data, when the responses between drivers and users of other modes of transport were compared, the difference in percentages is not as pronounced as one may have expected:

- 19% of drivers agreed; 69% disagreed
- 23% of walkers agreed; 63% disagreed
- 26% of cyclists agreed; 59% disagreed

Those without a disability were slightly more inclined to disagree with the proposal (63%) than those with a disability (67%), but not by a marked amount.

75% of white respondents disagree whilst only 49% of non-white/BAME respondents disagreed.

Overall statistics:

- 98% of responses were from individuals, not organisations
- 73% of respondents live in Merton
- 3% work in Merton
- 22% both live and work in Merton
- 2% neither live nor work in Merton

Appendix C: Additional Consultation questions

What types of parking enforcement do you think are the most important?

When asked what types of parking enforcement were the most important, there were 32 responses, with 33 comments as can be seen in the table below:

What types of parking enforcement do you think are most important? 32 responses		
Lane/route blocking - bus / bike lanes / pavement / red route / yellow lines	8	24.5%
More parking spaces are required / increase garages	5	15%
Sustainable transport - more cycling infrastructure, better public transport logistics, etc.	2	6%
More enforcement - More traffic wardens/ speed cameras	2	6%
Pedestrian Crossings / zig zag lines	3	9%
Resident bays/resident only bays / free bays	8	24.5%
Misc - none, No car tax, combination, no staff permits	5	15%
Number of comments within the responses	33	100%

Respondent's Comments:

Approximately 50% of the respondents felt that parking enforcement was key in relation to resident bays, pavements and lanes/routes (cycle, bus etc.). These two areas clearly have a big impact on both residents and motorists travelling around and through Merton.

Any impeding of parking, particularly in resident bays, which residents have to pay to park in via a resident permit plus blocking lanes for motorists, are key concerns for motorists in Merton.

There were comments regarding inconsiderate parking on pedestrian crossings and zig zag lines, particularly around schools.

There was a request for more CEO enforcement/application of technology, so that alternatives are available and improvements to sustainable travel.

There was a general request for more parking bays and garages.

Council Response:

The motorists in Merton are concerned about being able to travel freely through Merton and to park as residents without being impeded and this is the objective of the proposed increase to ensure that inconsiderate parking is deterred. Merton works hard to ensure that there is a good traffic flow throughout Merton for all motorists.

Unfortunately, there is a level of inconsiderate parking that impacts on that traffic flow hence the need for enforcement action with a penalty that ensures no repetition.

Parking spaces are not really going to increase because of the conflicting demands on road space. The main objective is to ensure that we optimise the use of all available parking bays and that they are used effectively and efficiently. Better management of current parking spaces, through ensuring compliance with parking regulations could improve parking availability.

Merton's transport policy is to improve sustainable transport options and it has invested over £4,000,000 in cycling over the last 5 financial years. As a result of the Coronavirus pandemic and the associated requirement for increased space for social distancing and reduced public transport capacity, the Government, TfL and Merton wants to encourage use of active travel and Merton has received emergency funding to implement new and improved cycle and walking facilities across the Borough.

With the increased uptake in active travel methods, particularly walking and cycling, enforcement through the issuing of PCNs is vital to protect key walking and cycling routes and discouraging illegal parking, particularly during COVID-19 when more footway space is required for social distancing.

Merton is committed to improving access and reducing traffic danger around all Merton schools and for all children in Merton. There is a large project that has commenced in Merton to introduce school streets to prevent through traffic into roads near schools during school start and finish times.

As part of the COVID-19 response measures, Merton has recently secured further funding to implement a number of additional school street schemes from September. To ensure compliance PCNs are issued using patrols and/ or cameras.

The Council also aims to encourage more sustainable forms of car use, including car club and electric vehicles, and has a number of on-street dedicated parking bays for these types of vehicle. Enforcement through the use of PCNs ensures that these bays are protected and for the Electric Vehicle (EV) bays that they are only used by vehicles that are being charged.

This will become increasingly important in future years as the number of EVs is likely to increase and there will be greater demand to use the public charging points

Please tell us if you have any suggestions for how we could deter inconsiderate parking in Merton.

There were 243 responses with 362 suggestions as can be seen in the table below:

Section	Subject	No. of comments	%
A	Enforcement	126	35%
B	Parking Spaces	87	24%
C	Educate/ Encourage	31	8%
D	Technology	23	6%
E	Sustainable Travel	22	6%
F	CPZ issues	13	4%
G	School issues	12	4%
H	Local Economy	21	6%
I	Miscellaneous	27	7%
	TOTAL	362	100%

The suggestions have been grouped as per the sections above and below is a summary of the suggestions in each section:

Section A: Enforcement

Respondent's comments:

- Maximum enforcement should be undertaken
- Monitor PCNs and then take the appropriate remedial action

- Clamp and tow away
- Always follow up reports of illegally parked vehicles
- Ban persistent offenders from parking in Merton
- Improved response to phone call reports
- You never see a CEO in certain areas
- Enforce the 20mph rule
- Actively patrol the CPZs
- Signs need to be visible and clear to understand
- More enforcement of Blue Badge holders
- Stop car idling

Section B: Parking Spaces

Respondent's comments:

- Maximise parking spaces
- Offer flexible parking in response to area/demand
- Allow verge parking
- Offer cheaper parking
- Add more levels to current car parks
- Need more loading bays
- Specific bays for larger vehicles
- Not enough resident only parking bays
- Parking bays should be painted out everywhere to maximise available space

Section C: Educate/Encourage

Respondent's comments:

- Inform and educate motorists as often they do not realise they are wrong
- Improve signage and make motorists aware
- Improve communication about parking etc not just signs on lamp posts

Section D: Technology

Respondent's comments:

- Use technology to monitor all parking
- All CEOs should wear body cameras
- Use CCTV to monitor and only give a fine if repeat offenders
- Enforcement every time
- Use technology to remove abandoned vehicles quicker
- More working speed cameras are required
- Online reporting on illegally parked vehicles
- Improve the RingGo app

Section E: Sustainable Travel

Respondent's comments:

- More cycle lanes
- Protected cycle lanes
- Better public transport
- Work with TfL to improve public transport
- Improve walking opportunities in Merton
- Improve safety on roads for everyone including families

Section F: CPZ Issues

Respondent's comments:

- CPZs should be borough wide CPZs not just in certain areas
- Change restriction periods to the needs of CPZs
- Let residents in CPZs decide what they need

Section G: School Issues

Respondent's comments:

- Parents often show a lack of consideration for local residents and pedestrians by parking anywhere
- Enforce around schools they should not park without a permit or paying
- Too many parents park badly around schools
- More walk to school initiatives
- Parking near schools difficult because of the number of teacher permits

Section H: Local Economy

Respondent's comments:

- More parking to assist local businesses
- Reinvest to improve and support visitors to the businesses in Merton
- More loading bays with short turn over times – especially outside charity shops
- Need to allow delivery vans

Section I: Miscellaneous

Respondent's comments:

- Money making exercise not good during COVID-19
- Bring back paper permits so we know who is parked legally
- Very difficult to appeal
- Improve street design
- Stop Merton staff parking around Morden thereby making it difficult for residents
- Pavements are in a poor state of repair due to vehicles driving over them
- Just paying for councillors
- Stop approving builds for new houses and hotels

Other comments about the proposal to increase PCNs to Band A:

Table 1: Issues raised:

	Group	Detail	No of comments	%
A	Financial	Council just making money, Increase will have no impact, charging too high an increase, increased cases to bailiffs and they make more money, parking charges high so more will risk parking inconsiderately	125	44%
B	Enforcement	More staff, better quality service/staff, more PCNs to be issued, better signage, targeted activity, guaranteed visits, responsive service, visit all roads/areas, help residents, move electric car bays, tow away, different approach to different types of inconsiderate parking	68	24%

C	Fully Supported	Good/excellent idea to increase	13	5%
D	Educate and Encourage	Encourage different behaviour, advertising impact of parking in disabled bays as example had an impact, explain why certain parking is inconsiderate	27	10%
E	Sustainable travel	Improve alternatives to car use, cycle lanes, walking in Merton, public transport	7	2.5%
F	Improve technology	Use technology to improve parking	9	3%
G	Local Economy	Impact on business, high street,	14	5%
H	MISC	No comments, unrelated directly to PCNs, stop council staff parking, improve/review appeal process	18	6.5%
		Total number of issues commented upon	281	100%

Section A: Financial

Respondent's comments:

There were 125 comments of a financial nature ranging from suggestions that this was a Council revenue making exercise to suggestions that the proposed penalty charges should be higher.

A large number of respondents stated that the current penalty cost was high enough and any further increase was just a revenue raising exercise by Merton. In addition, many respondents felt that an increase would not change motorist behaviour regarding inconsiderate parking.

To summarise there were a range of comments recorded and the following are the key reasons:

- revenue exercise/punishment on motorists;
- increase will not change behaviour / not high enough to impact;
- no evidence presented that the proposed increase would change inconsiderate parking behaviour;
- proposed increase would impact those on a low income disproportionately and at a time when there is greater financial disparity as a result of COVID-19 (higher dependence on private vehicle and high level of unemployment);
- parking charges increased so motorists are more likely to risk a PCN;
- increased financial punishment for those making a genuine mistake rather than being consciously inconsiderate;
- Increased costs for council/residents because more cases to bailiffs and courts.

Council Response:

The Council acknowledges that the proposal will result in an increased penalty charge; however, the increase is reasonable in relation to the operations, objectives of PCNs and in comparison, with other local authorities.

It should also be noted that there has been no increase to the cost of a PCN issued in London at either Band B or Band A Charges since 15 April 2011, and it is worth considering the impact of a penalty that has not changed in line with inflation for 9 years.

On-street PCN Charges:

Currently, 13 London Authorities issue PCNs at Band A charges, and 11 London Authorities issue PCNs at a combination of Band A and Band B charges. The remainder, including Merton, issue PCNs and Band B charges.

Off-street PCN Charges:

Currently, 13 London Authorities issue PCNs at Band A charges, and 1 London Authority issues PCNs at a combination of Band A and Band B charges. The remainder, including Merton, issue PCNs and Band B charges.

A map of the London Boroughs showing the banding charges can be seen in Appendix 2 of report.

With regard to the significant number of statements that Merton is increasing the charges as a revenue exercise please note the following: **Taken from the PCN Report to Council on 5/2/20:**

Whilst the purpose of any enforcement regime is to improve compliance with the restrictions in force, consideration also needs to be given to any surplus money that may be generated as a result of moving to these charges. Section 55 of the Traffic Management Act (2004) specifies what any surpluses from parking activities may be used for. Surpluses from parking activities are currently used to contribute towards concessionary travel for Merton residents, and carriageway and footway maintenance.

Any additional surplus from a change to the banding charge will continue to contribute towards these activities, but the desired effect of the change is to reduce the number of contraventions.

In terms of any income that may be generated by the increased charges, the Traffic Management Act 2004 amends section 55 (4) of the Road Traffic Regulation Act 1984 and directs that income should be used:

- (a) To make good any payment used for parking places,*
 - (b) For the provision of or maintenance of off-street parking (whether in the Open or not) and*
 - (c) Where off-street parking provision is unnecessary or undesirable:*
 - (i) To meet the costs of provision of or operation of public passenger transport services, or*
 - (ii) For highway or road improvement projects within the borough, or*
 - (iii) For meeting costs incurred by the authority in respect of the maintenance of roads maintained at the public expense by them,*
- Or*
- (iv) For the purposes of environmental improvement in the local authority's area, or*
 - (v) Any other purposes for which the authority may lawfully incur expenditure.*

In addition, for London authorities, this includes the costs of doing anything "which facilitates the implementation of the London transport strategy". However, for the reasons set out above Members must disregard any benefit in terms of the revenue that may be generated by these proposals when making the decision as to whether to proceed or not.

Some respondents stated that the increase would not change motorist behaviour and felt there was no evidence to support that an increased penalty charge would reduce inconsiderate behaviour.

As there are no areas in Merton that are currently charged at PCN Band A charges, we do not have in house data to make a reasonable comparison, however, in their recent application to move to borough wide Band A PCN charges, the Royal Borough of Greenwich submitted data showing that there had been an overall 39% increase in the number of PCNs issued borough wide, it demonstrated that in areas where PCNs are charged at Band A, there was only a 25% increase in the number of PCNs issued, in areas where PCNs are charged at Band B, there had been a 50% increase in the number of PCNs issued over the same 4 year period.

A number of respondents felt that the proposed increased charges were too high.

While Merton are applying to move from Band B PCN charges to Band A PCN charges, the actual cost of a PCN is set by the Secretary of State for Transport in conjunction with the offices of the Mayor of London. Enforcing authorities have no say in the actual cost of a PCN, however, enforcing authorities do have the option of applying to issue PCNs under Band A charges. It should be noted that all PCNs issued for Bus Lane and Moving Traffic contraventions are already charged at Band A charges.

In addition, there were concerns that the increased charge would impact those on a low income disproportionately and at a time when there is greater financial disparity as a result of COVID-19 and the higher dependence on personal vehicles for travel.

It should be recognised that it is the minority of motorists who receive PCNs.

The Highway Code is a series of rules that all motorists driving on the roads in England, Wales and Scotland are legally required to obey, and those motorists who receive their license within the UK, are legally required to study these rules and pass an exam demonstrating their understanding of these rules, before they are allowed to complete their practical driving exam.

Motorists are advised that a failure to follow these rules, in this instance those associated with parking, may result in a fine or penalty being issued, points being added to a motorist's license, and in the most serious instances, criminal prosecution and imprisonment.

Some respondents stated that because the parking charges in Merton have increased that motorists might be more likely to risk inconsiderate parking/failure to pay for parking.

It should be noted that the opposite argument could be presented in that the penalty charge needs to increase, otherwise it might be more cost effective for motorists to risk inconsiderate parking/failure to pay over a period of time. Plus the increased parking charges/permit costs places an obligation on the council to ensure that it makes inconsiderate parking a financial risk that is not worth taking.

A number of respondents stated that a number of PCNs are issued based on genuine mistakes such as drivers not getting back to a parked vehicle before the parking ticket has expired. Merton acknowledges that there are occasions when genuine errors occur, such as inability to return to a vehicle due to illness and whenever possible fully considers representations made. Each case is judged on its own merits, and on the basis of the information provided by the driver.

In addition, please note the comments and responses in the section - educate and encourage section where Merton acknowledges that all advertising campaigns to raise awareness are beneficial.

Section B - Enforcement

Respondent's comments:

There were 68 comments about enforcement issues covering the following:

- more enforcement / targeted activity
- more enforcement staff
- trained / experienced staff
- guaranteed visits and quick to respond
- better / clearer signs and information
- just tow-away cars
- More activity to protect disabled bays / in residential areas as well

There were a number of comments about the need for greater enforcement as the best deterrent and in particular targeted enforcement. For example, targeting key areas, offences and visiting areas regularly.

A number of respondents suggested increasing the number of enforcement staff and the quality of staff in order to increase and improve enforcement in Merton. In particular, a number of respondents suggested that a quicker response from enforcement officers would reduce inconsiderate parking.

Respondents stated that often contraventions occurred because of a lack of signs and/or clear signs. The lack of signs/clear signs resulted in motorists parking inconsiderately without knowledge and in error.

Respondents also stated that vehicles parked inconsiderately should be just towed as that offered a speedy resolution and was more likely to cost more therefore be a better deterrent.

Some respondents stated that blue badge bays need to be better enforced, not just in car parks and busy areas but also in residential roads.

Council Response:

Significant work has been undertaken in enforcement over the last 12/18 months as follows:

- Recruitment of CEOs.
- Significant training activities for CEOs covering Blue Badge Inspections, Using Body Worn Cameras, Introduction to School Safety Zone, Dealing with Terrorist Incidents, the training given to CEOs has included training on-site with both set up cases and active cases
- Improved equipment for CEOs more charging points, streaming camera for use at school activities, improved uniform
- A review is being undertaken of future equipment required by CEOs such as new handhelds, body worn cameras, etc.
- New environmentally friendly electric mopeds and cars for use by CEOs for use in specific enforcement activities.

Merton is committed to fully training all staff and this is also the case with the CEOs. The training CEOs receive is wide ranging from the legislation, equipment used, types of contraventions, targeted activity and training to build and develop their customer service skills. CEOs face a great deal of interactions with the public which, due to the nature of the work, can initiate negative reactions from the public.

A number of new targeted enforcement activities have been undertaken by the CEOs as follows:

- Body Worn Cameras (BWCs) for all PCN issues (currently awaiting delivery of new BWCs to facilitate full and constant use when issuing PCNs).
- Blue Badge (BB) Inspections – this is to address and reduce the abuse of both Disabled Parking Bays and BBs and commenced on 17 December 2019. Up until 26 February 2020, 166 BB inspections were carried out, and in 5 cases, a BB was withdrawn/removed etc. One issue was that BB activity tends to be in busy areas but little activity regarding disabled bays in residential areas

The Traffic Signs Regulations and General Directions (TSRGD) (2016) provides statutory guidance to those responsible for traffic networks on where signs and markings should be positioned. Whenever possible, Merton will meet or exceed these minimum standards. However, the TSRGD does recognise that at some locations, because of the site layout, it is not possible to exactly match these minimum requirements, which is why this is statutory guidance as opposed to statutory requirement.

A number of respondents highlighted that areas/roads are not often visited and that responses to reports of inconsiderate parking are slow.

Residents are able to report illegally parked vehicles by calling 020 8545 4661 (option 3), Monday to Saturday from 7am to 10pm, and Sundays 11.45am to 4pm. CEOs endeavour to attend to these site visits within 30 minutes of them being reported, however, our ability to attend to these site visits is subject to officer availability and locality. Prior to the start of CPZs coming into operation, CEOs focus on primarily enforcing waiting and loading restrictions, and once the CPZs start operating, the main focus for enforcement is in the operational CPZ areas. Enforcement does take place in non-CPZ areas during these times as well.

A few respondents felt that the most effective way of dealing with inconsiderate parking was to tow away the vehicle. They stated that the issue re inconsiderate parking would be immediately resolved and the high cost of retrieving the vehicle would deter repeat offenders. In order for an authority to operate a 'tow away' system, there are a number of criteria that must be met, including the operation of a secure storage facility for any vehicles that have been removed.

At this time, Merton do not have access to a secure, vehicle storage facility. Evidence across London suggests that a tow away service does not in itself reduce the number of PCNs and thus it is not seen as an alternative to the proposals set out in this report.

Section C - Fully Supported

Respondents stated:

There were 13 respondents that stated directly and explicitly that they supported the proposal to increase penalty charges to Band A. Respondent statements varied from agreed, Will help reduce inconsiderate parking, good / excellent idea and yes agree increase with suggestions the cost of a penalty be even higher to encourage compliance.

Council Response:

We acknowledge the positive response from the respondents. With regard to the comments that the increase should be higher, as previously advised, individual enforcing authorities have no say in the cost of a PCN as the cost of all PCN charges in London is agreed by the Secretary of State for Transport, in conjunction with the offices of the Mayor of London.

Section D - Educate and Encourage**Respondent's comments:**

There were 27 respondents who recorded comments regarding the need to educate and encourage motorists to not park inconsiderately. The respondents stated that more publicity and awareness of what inconsiderate parking is and the impact it can have on traffic flow and other motorists plus possibly on pedestrians.

The general view was that often motorists are not aware that they are parking inconsiderately or appreciate the impact it can have. An example given was the nationwide advertising of parking in disabled bays and how that made motorists realise the importance of not parking in disabled bays.

In addition, respondents stated that being aware of the parking options/alternatives would help reduce inconsiderate parking. Advertising the options such as sustainable travel would be good and encourage alternative travel options to vehicles.

Council Response:

All motorists driving on the roads are required to study the Highway Code, which is a series of driving and parking rules that motorists are legally required to adhere to while driving and parking on the roads in England, Scotland and Wales.

In addition to this, Merton have undertaken a number of awareness campaigns in relation to parking on school keep clear markings, engine idling and the enforcement of drop kerbs, this is as well as issuing warning notices in areas when enforcement starts for the first time e.g. in new CPZ areas.

Section E – Sustainable travel**Respondent's comments:**

A number of respondents stated that if there were more cycle lanes, protected cycle lanes and connected cycle lanes across Merton that would reduce the reliance on vehicles. One respondent stated that they would be happy to pay a bike tax if that resulted in more cycle lanes and preferably protected cycle lanes.

Respondents also stated that more car clubs as an alternative to private ownership is dependent on easy access.

Respondents stated that safer streets would also encourage more walking throughout Merton particularly for families.

Council Response:

As previously advised, Merton has significantly improved cycle lanes, in fact it has invested over £4,000,000 in cycling over the last 5 financial years and while future funding for cycling is unknown at this time as a result of the Coronavirus pandemic, there is likely to be new funding available given the high priority that cycling infrastructure now has.

Section F – Improve Technology**Respondent's comments:**

Respondents stated that better use of technology throughout Merton might reduce inconsiderate parking. It was suggested that SMART traffic lights might help.

Respondents stated that using technology to advertise alternatives to driving would help reduce inconsiderate parking. For example, advertising available parking spaces in car parks, busy roads.

It was suggested that some inconsiderate parking might be caused by the fact that motorists might be because they do not have access to a Smart phone therefore cannot book via RingGo and consequently take a risk. I think we might want to pick this up in the Equalities Assessment.

Council Response:

Within London, the management of the traffic light network is the responsibility of TfL.

Merton have previously looked at introducing sensors in bays in parking bays, primarily in off-street car parks but also on street at high demand locations, however, the cost of doing so, including the associated costs of physical and digital infrastructure, were prohibitive in the pre-COVID-19 environment.

Many map applications, available on most smart phones, will provide an indication of how busy a given route is, and most suggest alternative routes to drivers.

The majority of pay and display locations, both on and off-street, make provision for motorists to pay either in cash, or by mobile phone, and future technology will likely provide motorists with more tools and information to park legally.

Section G – Local Economy**Respondents comments:**

Respondents stated that there was a need for more parking spaces to avoid inconsiderate parking. It was stated that often motorists take a risk as they cannot find anywhere to park.

Respondents suggested a number of initiatives that could reduce inconsiderate parking and support the local economy as follows:

- More short stay parking bays in key areas such as High streets
- Free parking bays
- More EV bays
- More car parks built
- Flexible parking bays that respond to demand throughout the day/week
- Lower parking charges in the evening in key areas

Respondents highlighted that the number of delivery vehicles has increased and due to COVID-19 will continue to increase. Without adequate parking risk of inconsiderate parking will continue to increase.

Council Response:

Merton is committed to improving air quality for everyone visiting and residing in Merton and following the declaring of an air quality emergency there are a number of initiatives developed and implemented to reduce air pollution in Merton. One of those initiatives is to reduce car ownership and use in Merton. Therefore, Merton does not plan to increase the number of parking bays or number of car parks.

As a result of traffic flow issues, Merton would not look to introduce further short stay pay and display bays in high street locations, and rather, would encourage motorists to use off-street parking facilities.

Currently, only the Wimbledon Town Centre Car Parks operate after 6pm, and at weekends, and customers can pay a flat fee of £2.50 in all car parks for Sunday parking, and a flat fee of £2 in St Georges Road car park and Queens Road car park after 6pm, Monday to Saturday.

Section H – Miscellaneous

Respondents stated:

Some respondents stated they had no comments. Others stated that they would only make a formal representation or support the proposal if another activity was completed such as a review of the appeal process.

There were a variety of statements as follows:

- Build less residential property and demand for parking will reduce
- Reduce driveway costs
- Increase for a trial period
- Undertake more research and/or modelling
- Merton staff parking for free in local roads impacts on residents being able to park after paying for a permit
- Need more car clubs
- Middle class more able to appeal
- Use money made to deal with fly tipping in Mitcham
- Use the money to repair roads and pavements
- Increasing the cost of parking increases the risk of inconsiderate parking

Council Response:

As part of the planning process, particularly for multi-dwelling residences in CPZ areas, the planning team will consult with Parking Services in relation to demand for parking within the area.

As a result of this, many properties have received planning consent, but only on the basis that the development is car free i.e. residents at the addresses are not eligible to purchase any types of permits for use within the relevant CPZ.

Merton endeavour to ensure that the cost of applying for and installing drop kerbs for access to off-street parking are as reasonable as possible. In order to achieve this, the relevant changes to Traffic Management Orders (TMO) are advertised in bulk as opposed to

individual notices per property, and the cost of the installation of the drop kerb also reflects the ongoing cost of maintaining this converted section of footway, which is the council's responsibility.

Any changes to policy are regularly reviewed, as would happen should the PCN charges be increased from Band B to Band A, and in this instance an indication of the effectiveness of this change would be shown in whether or not there was increased compliance with the parking restrictions in force.

A review of staff travel and parking was undertaken pre-lockdown, and this was due to be reviewed in the early part of 2020/21, however, as a result of lockdown and most staff working from home, the demand for parking in Morden Town Centre, both on and off-street, has significantly reduced. This review is still due to take place this year.

The Council is actively promoting free car club membership and dedicated car club bays for larger development. It is also engaging separately with existing car club operators to expand their schemes in the borough. To support car clubs, we provide discounts for all electric vehicles and a permit price freeze on floating car club vehicles. New operators are similarly being encouraged to launch new services in the borough.

The legislation that allows a local authority to undertake the civil enforcement of parking contraventions, also sets out a statutory process for the motorist to appeal against the issuing of the PCN. This process is the same irrespective of an individual's social class, and where appropriate, adjustments may be made to assist individuals. Guidance on the process is available on the council's own web pages, as well as on the London Tribunals website, and motorists can contact Merton Parking Services by phone from 11am to 4pm, Monday to Friday for guidance and advice from a member of the PCN processing team.


As previously advised in the section relating to financial comments, there are legal restrictions on what any surplus income from PCN charges may be used, however, traffic and highways projects are amongst those permitted.

Some respondents stated that because the parking charges in Merton have increased that motorists might be more likely to risk inconsiderate parking/failure to pay for parking.


It should be noted that the opposite argument could be presented in that the penalty charge needs to increase, otherwise it might be more cost effective for motorists to risk inconsiderate parking/failure to pay over a period of time. Plus, the increased parking charges/permit costs places an obligation on the council to ensure that it makes inconsiderate parking a financial risk that is not worth taking.


Appendix D: Online and Social Media Engagement

Twitter: 17 June 2020

Tweet activity		X
 <p>Merton Council @Merton_Council</p> <p>We'd like your views on increasing parking penalties to tackle inconsiderate parking & enable us to:</p> <ul style="list-style-type: none">✓ Protect spaces for dedicated users✓ Better traffic flow & ease congestion✓ Improve safety w/ fewer obstructions <p>Fill in our survey by 28 Jun → http://ow.ly/Ep3j50A1puz pic.twitter.com/iSjaYeATQo</p>	Impressions	1,867
	Total engagements	51
	Detail expands	23
	Link clicks	18
	Retweets	3
	Media engagements	3
	Replies	2
	Profile clicks	2

Twitter: 11 June 2020

Tweet activity		X
 <p>Merton Council @Merton_Council</p> <p>We'd like your views on increasing parking penalties to tackle inconsiderate parking & enable us to:</p> <ul style="list-style-type: none">✓ Protect spaces for dedicated users✓ Better traffic flow & ease congestion✓ Improve safety w/ fewer obstructions <p>Fill in our survey by 28 Jun → http://ow.ly/Ep3j50A1puz pic.twitter.com/y4qpWH084r</p>	Impressions	1,940
	Media views	349
	Total engagements	98
	Detail expands	58
	Link clicks	30
	Replies	6
	Media engagements	2
	Retweets	1
	Likes	1



Reach a bigger audience
Get more engagements by promoting this Tweet!

Get started

Twitter: 9 June 2020

Tweet activity



Merton Council @Merton_Council

Have your say on our proposal to increase parking penalty charges, this will enable us to:

- ✓ Protect spaces for dedicated users
- ✓ Better traffic flow & ease congestion
- ✓ Improve safety with fewer obstructions

Please fill in our survey by 28 June <http://ow.ly/Ep3j50A1puz>
pic.twitter.com/Bh20V9qBeJ



Reach a bigger audience

Get more engagements by promoting this Tweet!

Impressions	2,920
Total engagements	210
Detail expands	114
Link clicks	61
Retweets	9
Media engagements	7
Profile clicks	7
Replies	6
Likes	6

Facebook: 17 June 2020



Merton Council

Published by Hootsuite [?] · 17 June · 🌐

P We would like your views on how to tackle the increase in inconsiderate parking.

Please help us understand your thoughts by filling in our survey on our proposals to increase parking penalty charges for people who break parking rules.

By increasing parking penalties, we believe we can deter those who break the rules and make space for those who need to park the most. ...

[See more](#)



Performance for your post

1,476 People Reached

14 Likes, Comments & Shares ⓘ

2 Likes	2 On Post	0 On Shares
9 Comments	9 On Post	0 On Shares
3 Shares	3 On Post	0 On Shares

135 Post Clicks

12 Photo views	17 Link clicks ⓘ	106 Other Clicks ⓘ
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NEGATIVE FEEDBACK

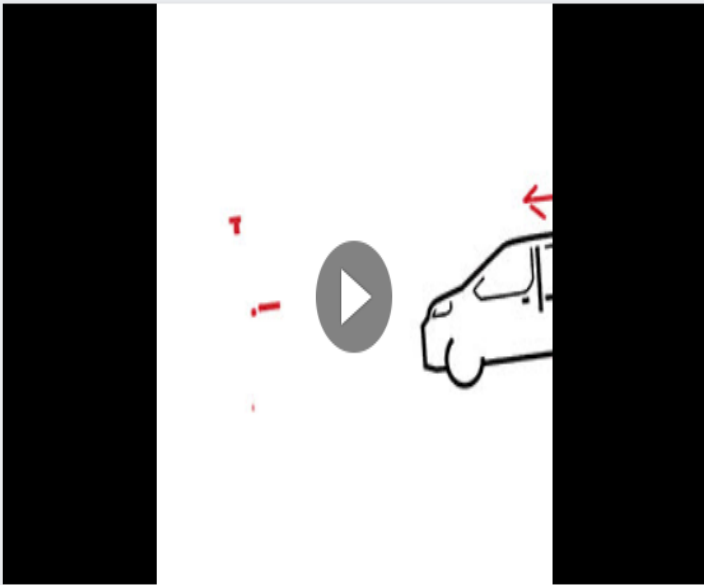
0 Hide post	0 Hide all posts
0 Report as spam	0 Unlike Page

Reported stats may be delayed from what appears on posts

Contacts



Facebook: 11 June 2020



Total video performance ⓘ

🕒 Minutes viewed	41	>
🎥 1-minute video views	--	>
🎥 10-second video views	96	>
🎥 3-second video views	175	>
📺 Average video watch time	0:04	>
📊 Audience retention		>
👤 Audience and engagement		>

Merton Council...


📌 We would like your views on how to tackle the increase in inconsiderate parking. Please help us understand your thoughts by filling in our survey on our proposals to increase parking penalty charges for people who break parking rules. By increasing ...

Insights are recorded in the Pacific Time Zone and may not reflect the most recent data.

Create Watch Party with Video

Create Post with Video

Facebook: 9 June 2020




Merton Council

Published by Hootsuite [?] · 9 June · 🌐

📌 Do you park in Merton? If so, we would like your views. Please help us understand your thoughts by filling in our survey on our proposals to increase parking penalty charges for people who break parking rules.

By increasing parking penalties, we believe we can deter those who break the rules and make space for those who need to park the most. ...

[See more](#)



Performance for your post

2,831 People Reached

55 Reactions, comments & shares ⓘ

8 👍 Like	7 On post	1 On shares
2 😂 Haha	2 On post	0 On shares
1 😡 Angry	1 On post	0 On shares
41 Comments	38 On Post	3 On Shares
3 Shares	3 On Post	0 On Shares

467 Post Clicks


28 Photo views	65 Link clicks ⓘ	374 Other Clicks ⓘ
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NEGATIVE FEEDBACK

0 Hide post

🔗 **Contacts**

Facebook: 9 June 2020

**Merton Council**

Published by Hootsuite [?] · 9 June ·

P Do you park in Merton? If so, we would like your views.


Please help us understand your thoughts by filling in our survey on our proposals to increase parking penalty charges for people who break parking rules.

By increasing parking penalties, we believe we can deter those who break the rules and make space for those who need to park the most.

This will enable us to:

- ✓ Protect spaces for dedicated users, such as disabled blue-badge holders.
- ✓ Have better traffic flow and ease congestion.
- ✓ Improve safety with fewer obstructions - especially for school pick-up areas.

Have you say - fill in our survey by 28 June [pw.ly/Ep3j50A1puz](https://www.bw.ly/Ep3j50A1puz)



Performance for your post

1,588 People Reached

10 Reactions, comments & shares

2 Like	1 On post	1 On shares
1 Haha	1 On post	0 On shares
6 Comments	6 On Post	0 On Shares
1 Shares	1 On Post	0 On Shares

145 Post Clicks

7 Photo views	26 Link clicks	112 Other Clicks
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NEGATIVE FEEDBACK

0 Hide post	0 Hide all posts
0 Report as spam	0 Unlike Page

Reported stats may be del

Contacts

Appendix 2: Existing Bandings in London

Existing on-street penalty charge bands



Existing off-street penalty charge bands



Appendix 3: List of LB Merton Boundary Roads with Neighbouring Boroughs

Shared Borough Boundary	Shared Road Name	Shared Road USRN	Extract Comment
Merton-Sutton	Stonecot Hill	22601910	Potentially whole road is in Sutton
	Lower Morden Lane	22104038	Shared
	Elm Road West	22601481	Shared
	Love Lane	22104020	Dual carriageway with island in the middle
	Bishopsford Road	22100636	Part of road is whole in Sutton, other section is whole in Merton
	Goat Road	22102868	Part of road is whole in Sutton, other section is whole in Merton
Merton-Croydon	South Lodge	22105877	Road whole in Merton - No Croydon fronting properties
	Recreation Way	22105349	Road whole in Merton - No Croydon fronting properties
	DARCY ROAD	22101956	Shared
	Turle Road	22106363	Shared
Merton-Lambeth	Greyhound Terrace	22102979	Shared
	LEONARD ROAD	22103864	Shared
	BENNETTS CLOSE	22100554	Road whole in Merton - No Lambeth fronting properties
Merton-Wandsworth	Mitcham Road	22104473	Shared
	Denison Road to Borough Boundary alongside River Wandle	22108218	Shared
	Revelstoke Road	22105361	Shared
	Bathgate Road	22100444	Shared
	Queensmere Road	22105263	Shared
Merton-Kingston	None		

Sadiq Khan
Mayor of London
Greater London Authority
City Hall
The Queen's Walk
London
SE1 2AA

Contact: Spencer Palmer
Direct line: [REDACTED]
Email: [REDACTED]@londoncouncils.gov.uk

Date: 23 October 2020

Dear Mr Khan

Additional parking penalties and related charges for the London Borough of Merton

On 15 October 2020, London Councils' Transport and Environment Committee considered a proposal for changing the level of Additional Parking Charges applicable on borough roads in the London Borough of Merton and in accordance with the relevant legislation have instructed me to seek your approval for a change to the charges. The report considered by the Committee in reaching its decision is attached to this letter. It can also be found on our website.

The report sets out Merton's proposal to change from Band B to Band A charges across the borough. This change is intended to help improve compliance with essential traffic and parking management measures. I am therefore writing to request your approval of the proposed change set out above.

The borough would prefer to implement this change from 1st January 2021. It would be helpful, therefore, if you were able to agree this as soon as possible to allow the Secretary of State the statutory 28 day period to decide if he will exercise any veto and give time for the change to be advertised three weeks in advance, as required by legislation.

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

Yours sincerely

A handwritten signature in black ink, appearing to read "S. Palmer".

Spencer Palmer
Director, Transport and Mobility

Cc: Heidi Alexander – Deputy Mayor for Transport

[REDACTED]

From: [REDACTED]
Sent: 06 September 2021 14:56
To: [REDACTED]
Subject: RE: GLA's response re: Merton's band change

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 02 November 2020 12:18
To: Spencer Palmer <[REDACTED]@londoncouncils.gov.uk>
Cc: TT Correspondence <[REDACTED]@london.gov.uk>; Tim Steer <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@londoncouncils.gov.uk>
Subject: RE: Spencer's letter to Sadiq re: Merton's band change

Dear Spencer,

Thank you for your letter to the Mayor dated 23 October regarding a request from the London Borough of Merton to change the parking band in the borough.

Having now reviewed the documents provided, I am writing to request a copy of the Equality Impact Assessment carried out by Merton. This will help us to understand how Merton has paid due regard to the Public Sector Equality Duty and ensure the Mayor has appropriate information in considering this request.

It's also of note that Merton's report states that 'the results of [the consultation]... support the introduction of Band A charging across the whole borough.' However, the report also notes that 'The consultation results show that overall, 27.5% of respondents agreed that an increase in the cost of a PCN is an effective way of discouraging inconsiderate parking and with 22% of respondents agreeing to the proposal of a change in Merton's PCN band charges. It appears that the scheme is not supported by the majority of residents.' It would be helpful to understand the conclusion that the consultation supports this proposal given those findings.

We note that Merton has received no response from Richmond, Lambeth and Wandsworth in respect of the proposals, does this still remain the case?

I am also sorry to note that it seems very unlikely that a decision will be taken in time for implementation by 1 January 2021. I know this will be disappointing to the borough but I hope you can appreciate the process to be followed, as well as the current unprecedented circumstance we're working in, which make that a challenging timeline.

Kind regards,

[REDACTED]

[REDACTED]

Transport Team Manager, Transport, Infrastructure and Connectivity
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA
[REDACTED] (note auto forwarded to mobile telephone)

london.gov.uk
[REDACTED] <[REDACTED]@london.gov.uk>

From: [REDACTED] <[\[REDACTED\]@londoncouncils.gov.uk](mailto:[REDACTED]@londoncouncils.gov.uk)>
Sent: 23 October 2020 11:15
To: [REDACTED] <[\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>; Mayor <mayor@london.gov.uk>
Cc: Tim Steer [REDACTED] <[\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>
Subject: Spencer's letter to Sadiq re: Merton's band change

Dear [REDACTED]

Please find attached Spencer Palmer's letter to Sadiq regarding Merton's band change which has also been emailed to Heidi. Grateful therefore if you could forward to Sadiq's attention as soon as possible and confirm receipt of this email plus attachments.

Thanks.

[REDACTED]

[REDACTED]

From: [REDACTED]@merton.gov.uk>
Sent: 06 January 2021 17:20
To: [REDACTED]
Cc: TT Correspondence; Spencer Palmer; [REDACTED]@londoncouncils.gov.uk; Tim Steer; Chris Lee; [REDACTED]
Subject: FW: GLA's response re: Merton's band change
Attachments: EIA Band B to A.doc; Band B to A PCN Consultation; Band B to A PCN Consultation; FW: Band B to A PCN Consultation
Importance: High

Dear [REDACTED]

Please find below responses to the questions raised in your email of the 2nd November 2020. We trust this is the information you require, but if you require any further information, please do not hesitate to contact us. We remain keen to take this proposal forward, with as early implementation date as possible.

Responses:

1. EIA attached
2. 72% of respondents agreed more needed to be done to improve traffic flow, and 60% of respondents agreed that inconsiderate parking makes roads more dangerous. This indicates strong support for more action to be taken by the local authority to improve these issues, and improvement for these issues normally occurs as a result of enforcement. High levels of enforcement already take place, and despite increased numbers of PCNs being issued every year, significant numbers of motorists still park in contravention of the parking regulations in force, with there being a number of repeat offenders. It is unsurprising that only a low number of respondents believe an increased PCN cost would encourage compliance, however it is also clear that the current band B charges are not acting as a deterrent to many motorists. It is also unsurprising that only 22% of individuals support the change in PCN bands, as many motorists perceive the charges of PCNs to be unfair. It is also worth noting that motorists who follow the parking regulations in place do not receive PCNs, and it is only the minority of motorists who receive PCNs, many of which are avoidable.
3. Emails were sent to Lambeth, and Richmond and Wandsworth (shared service) on 3 November 2020, offering a further opportunity for comment on this proposal, and while an acknowledgement was received from Lambeth, as well as a request for sight of the chief officers report, to date, no further comments have been received from these authorities. I have attached copies of these communications, including a copy of the communication to Lambeth providing them with a copy of the chief officers report.

Kind regards

[REDACTED] - London Borough of Merton

Direct Line: [REDACTED]

From: [REDACTED]@london.gov.uk>
Sent: 02 November 2020 12:18
To: Spencer Palmer [REDACTED]@londoncouncils.gov.uk>
Cc: TT Correspondence [REDACTED]@london.gov.uk>; Tim Steer [REDACTED]@london.gov.uk>; [REDACTED]@londoncouncils.gov.uk>
Subject: RE: Spencer's letter to Sadiq re: Merton's band change

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We note that Merton has received no response from Richmond, Lambeth and Wandsworth in respect of the proposals, does this still remain the case?

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Kind regards,

Transport Team Manager, Transport, Infrastructure and Connectivity

GREATERLONDONAUTHORITY

City Hall, The Queen's Walk, London SE1 2AA

(note auto forwarded to mobile telephone)

[london.gov.uk](https://www.london.gov.uk)

[\[redacted\]@london.gov.uk](mailto: [redacted]@london.gov.uk)

From: [\[redacted\]@londoncouncils.gov.uk](mailto: [redacted]@londoncouncils.gov.uk)>

Sent: 23 October 2020 11:15

To: [\[redacted\]@london.gov.uk](mailto: [redacted]@london.gov.uk); Mayor <mayor@london.gov.uk>

Cc: Tim Steer [\[redacted\]@london.gov.uk](mailto: [redacted]@london.gov.uk)>

Subject: Spencer's letter to Sadiq re: Merton's band change

Dear [redacted]

Please find attached Spencer Palmer's letter to Sadiq regarding Merton's band change which has also been emailed to Heidi. Grateful therefore if you could forward to Sadiq's attention as soon as possible and confirm receipt of this email plus attachments.

Thanks.

Yuan Yee

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Equality Analysis

Appendix 2



Please refer to the guidance for carrying out Equality Impact Assessments is available on the intranet
Text in blue is intended to provide guidance – you can delete this from your final version.

What are the proposals being assessed?	<p>Application to change Merton's PCN charge band from band B to band A. To effect this a full business case will need to be presented to Full Council. Following this, an application will be made to the London Councils Transport, and Environment Committee. Depending on the outcome at the Committee, the Mayor will also be required to ratify the application and the Secretary of State has final sign off.</p> <p>In setting out its measures of success, the proposed bandings and increase in PCN charges aims to deliver better compliance and driver behaviours in respect of parking regulations, which will reduce congestion, and lead to improved traffic flows and availability of spaces.</p> <p>The purpose of PCN parking charges is to dissuade motorists from breaking parking restrictions and charges must be proportionate. The income from charges must only be used in accordance with the Road Traffic Regulation Act 1984. These purposes are contained within the Council's traffic management and other policy objectives.</p>
Which Department/ Division has the responsibility for this?	Parking Services, Environment and Regeneration

Stage 1: Overview

Name and job title of lead officer	Ben Stephens, Head of Parking
1. What are the aims, objectives and desired outcomes of your proposal? (Also explain proposals e.g. reduction/removal of service, deletion of posts, changing criteria etc.)	<p>In setting out its measures of success, the proposed bandings and increase in PCN charges aims to deliver better compliance and driver behaviours in respect of parking regulations, which will reduce congestion, and lead to improved traffic flows and availability of spaces.</p> <p>Local authorities are not permitted to use PCN parking charges solely to raise income. When setting charges, we must instead focus on how the charges will contribute to delivering the Council's traffic management and other policy objectives.</p> <p>This proposal supports the rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.</p>
2. How does this contribute to the council's corporate priorities?	<p>Parking and Traffic Management</p> <p>This proposal is part of the important role Parking and transport policy has in managing the roads and wider travel needs of the public. Merton's policy links closely with the local Implementation Plan and the Mayors Transport Strategy, which sets out objectives in detail.</p> <p>It contributes in the following ways:</p> <ol style="list-style-type: none"> 1. Reduce congestion 2. Improve road safety 3. Improve air quality and meet EU quality standards 4. To meet the actions set out in the Merton Health and Wellbeing Strategy 2019 5. Adopt a healthy street approach 6. Promote healthier life styles and encourage more active travel 7. To ensure good parking management 8. To support the local economy 9. Providing funding for parking and wider transport scheme improvements

3. Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc.	The proposal will affect all residents, businesses, workers and visitors to the borough, across all socio-economic groups.
4. Is the responsibility shared with another department, authority or organisation? If so, who are the partners and who has overall responsibility?	Yes. Responsibility is shared with the following departments, organisations and partners. Future Merton, Highways and Transportation, Planning, Mayor of London, TfL, transport operators, Parking Services.

Stage 2: Collecting evidence/ data

5. What evidence have you considered as part of this assessment?

Provide details of the information you have reviewed to determine the impact your proposal would have on the protected characteristics (equality groups).

Following the Council meeting of 5 February 2020 at which Council made a resolution to apply to amend parking Penalty Charge Notice (PCN) from Band B charges to Band A, a borough wide consultation was under taken between 16 March 20 and 27 July 20.

In addition to notifying the statutory consultees of the consultation, details were also sent to the equality groups notifying them of this proposal. All consultees had at least 6 weeks' notice in which to consider the proposal and submit any views they felt relevant to the consultation.

The following themes were brought up in relation to certain equality groups;

- i. Disability – access to and enforcement of Blue Badge bays
- ii. Pregnancy and Maternity – access to parking close to final destination
- iii. Religion – the perceived lack of enforcement of parking restrictions in the vicinity of religious centres
- iv. Socio-economic – increased PCN costs and lack of payment instalment options will impact most on those in this equality group

Stage 3: Assessing impact and analysis

6. From the evidence you have considered, what areas of concern have you identified regarding the potential negative and positive impact on one or more protected characteristics (equality groups)?

Protected characteristic (equality group)	Tick which applies Positive impact		Tick which applies Potential negative impact		Reason Briefly explain what positive or negative impact has been identified
	Yes	No	Yes	No	
Age	X			X	<p><u>Positive Impact</u></p> <p>The proposals support the principle of effective traffic management for the whole population of and visitors to Merton.</p>

					<p>In setting out its measures of success, the proposed bandings and increase in PCN charges aims to deliver better compliance and driver behaviours in respect of parking regulations, which will reduce congestion, and lead to improved traffic flows and availability of spaces.</p> <p><u>Potential Negative Impact</u></p> <p>None identified</p>
Disability	X			X	<p><u>Positive Impact</u></p> <p>The proposals support the principle of effective traffic management for the whole population of and visitors to Merton.</p> <p>In setting out its measures of success, the proposed bandings and increase in PCN charges aims to deliver better compliance and driver behaviours in respect of parking regulations, which will reduce congestion, and lead to improved traffic flows and availability of spaces.</p> <p>The increased charges will act as a deterrent to those parking illegally in Blue Badge bays, and other locations, increasing the amount of available parking spaces for disabled motorists.</p> <p><u>Potential Negative Impact</u></p> <p>None identified</p>
Gender Reassignment	X			X	<p><u>Positive Impact</u></p> <p>The proposals support the principle of effective traffic management for the whole population of and visitors to Merton. In setting out its measures of success, the proposed bandings and increase in PCN charges aims to deliver better compliance and driver behaviors in</p>

					<p>respect of parking regulations, which will reduce congestion, and lead to improved traffic flows and availability of spaces.</p> <p><u>Potential Negative Impact</u></p> <p>None identified</p>
Marriage and Civil Partnership	X			X	<p><u>Positive Impact</u></p> <p>The proposals support the principle of effective traffic management for the whole population of and visitors to Merton.</p> <p>In setting out its measures of success, the proposed bandings and increase in PCN charges aims to deliver better compliance and driver behaviors in respect of parking regulations, which will reduce congestion, and lead to improved traffic flows and availability of spaces.</p> <p><u>Potential Negative Impact</u></p> <p>None identified</p>
Pregnancy and Maternity	X			X	<p><u>Positive Impact</u></p> <p>The proposals support the principle of effective traffic management for the whole population of and visitors to Merton.</p> <p>In setting out its measures of success, the proposed bandings and increase in PCN charges aims to deliver better compliance and driver behaviors in respect of parking regulations, which will reduce congestion, and lead to improved traffic flows and availability of spaces.</p> <p>Comments were made relating to pregnant mothers, and mothers of young children being unfairly issued with PCNs when they are required to park illegally to access their house, however as stated above, an increase in PCN charges aims to deliver better</p>

					<p>compliance and driver behaviors and lead to improved availability of spaces.</p> <p><u>Potential Negative Impact</u></p> <p>None identified</p>
Race	X			X	<p><u>Positive Impact</u></p> <p>The proposals support the principle of effective traffic management for the whole population of and visitors to Merton.</p> <p>In setting out its measures of success, the proposed bandings and increase in PCN charges aims to deliver better compliance and driver behaviors in respect of parking regulations, which will reduce congestion, and lead to improved traffic flows and availability of spaces.</p> <p><u>Potential Negative Impact</u></p> <p>Those within this group are more likely to impacted by an increase in the cost of PCNs as a result of wider inequalities</p>
Religion/ belief	X			X	<p><u>Positive Impact</u></p> <p>The proposals support the principle of effective traffic management for the whole population of and visitors to Merton.</p> <p>In setting out its measures of success, the proposed bandings and increase in PCN charges aims to deliver better compliance and driver behaviors in respect of parking regulations, which will reduce congestion, and lead to improved traffic flows and availability of spaces.</p> <p>Concerns were raised about a perceived lack of enforcement in the areas around religious centers on worship days, as above, the</p>

					<p>proposed increase in PCN charges aims to deliver better compliance and driver behaviors in respect of parking regulations, which will lead to improved availability of spaces.</p> <p><u>Potential Negative Impact</u></p> <p>None identified</p>
Sex (Gender)	X			X	<p><u>Positive Impact</u></p> <p>The proposals support the principle of effective traffic management for the whole population of and visitors to Merton.</p> <p>In setting out its measures of success, the proposed bandings and increase in PCN charges aims to deliver better compliance and driver behaviors in respect of parking regulations, which will reduce congestion, and lead to improved traffic flows and availability of spaces.</p> <p><u>Potential Negative Impact</u></p> <p>None identified</p>
Sexual orientation	X			X	<p><u>Positive Impact</u></p> <p>The proposals support the principle of effective traffic management for the whole population of and visitors to Merton.</p> <p>In setting out its measures of success, the proposed bandings and increase in PCN charges aims to deliver better compliance and driver behaviors in respect of parking regulations, which will reduce congestion, and lead to improved traffic flows and availability of spaces.</p> <p><u>Potential Negative Impact</u></p> <p>None identified</p>

Socio-economic status	X		X	<p><u>Positive Impact</u></p> <p>The proposals support the principle of effective traffic management for the whole population of and visitors to Merton.</p> <p>In setting out its measures of success, the proposed bandings and increase in PCN charges aims to deliver better compliance and driver behaviors in respect of parking regulations, which will reduce congestion, and lead to improved traffic flows and availability of spaces.</p> <p><u>Potential Negative Impact</u></p> <p>If the cost of a PCN increases, those on lower incomes may find it more difficult to pay the penalty charge.</p> <p>Concerns raised that with increased PCN charges and no facilities for payment plans, this will affect those in this equalities group.</p>
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7. Equality Analysis Improvement Action Plan template – Making adjustments for negative impact

The main theme to arise from the consultation in terms of a potential negative impact on any particular group, is that the increased cost of a PCN will impact on those from poor socio-economic households.

However, were it to be a case that these individuals would be negatively impacted as a result of an increased cost in a service that they pay for, measures could be put in place to address any inequalities arising as a result of the increase cost for a service.

However, a PCN is issued to a vehicle because the vehicle has been parked illegally, in contravention, of the parking regulations in force. A PCN is a penalty, not a charge for a service.

It should be noted that the majority of motorists park legally, and it is only the small minority of motorists that park illegally, and receive avoidable PCNs e.g. parking in a pay and display bay without making payment, and using a nearby cash point.

While there will be publicity across the borough, both online and via the Councils periodic 'My Merton' magazine, to make all motorists aware of this change in banding, as a PCN is a penalty, it would not be appropriate to allow for some to pay less than the actual PCN cost as a result of a perceived negative impact caused by this change in banding.

All motorists driving on the roads in England, Scotland and Wales are required to study the Highway Code as part of their driver training. They are then required to undertake an exam to demonstrate their understanding of these rules, which in many cases are legal requirements, by scoring a minimum of 86% in the exam.

The introduction to the Highway Code explains that many of the rules in the Highway Code are legal requirements, and a failure to obey these rules may result in a fine.

The introduction then explains that by obeying the rule in the Highway Code could significantly reduce road casualties and cutting the number of deaths and injuries that occur on our roads every day is a responsibility we all share.

If a PCN is issued, motorists do have the option to settle the PCN within 14 days of its date of issue, and if they do so, they receive a 50% discount on the cost of the penalty. Should they make representations instead of payment during this same period, and are unsuccessful, they will be given a further 14 days in which they have the opportunity to settle the PCN at the discounted rate.

In summary, prior to changing PCN banding and increasing the charges associated with parking PCNs, we will ensure that information is widely available to members of the public, as detailed above, at least 28 days in advance prior to changing the PCN costs.

Motorists will still have the opportunity to settle a PCN at a discounted rate, provided their payment is received within the relevant 14 day period.

In instances where an individual claims to be disadvantaged when a PCN has been issued, Parking Services have in place a vulnerable person's procedure.

The purpose of this procedure is not to cancel a PCN as the legislation under which these matters are enforced sets out a statutory avenue for the motorist to appeal against the issuing of the PCN, rather it is there to ensure that individuals are not disadvantaged within the appeal process, and if appropriate, return their case back to the stage at which the disadvantage prevented them from engaging with the appeals process.

Negative impact/ gap in information identified in the Equality Analysis	Action required to mitigate	How will you know this is achieved? E.g. performance measure/ target)	By when	Existing or additional resources?	Lead Officer	Action added to divisional/ team plan?
Socio-economic status	Consultation	An increase in the cost of a PCN may have a negative effect on the ability of individuals on low income to pay. Any changes to the current banding charges will involve further consultation with those groups affected	2020	Within existing resources.	Ben Stephens	Actions will be added once the consultation has been completed.

Socio-economic status	Post-consultation	<p>The consultation was advertised in MyMerton which is delivered across the borough and available to collect at key points such as libraries. This ensures as far as possible that those living in Merton are informed and those visiting also have an opportunity to be aware. In addition, the consultation was on our website and highlighted via different social media channels such as Twitter and Facebook.</p> <p>The known Resident Associations and Equality Groups were also informed and encourage to complete the online survey so that we could capture their views.</p> <p>It should be noted that it is only the minority of motorists that receive PCNs for illegal parking, and it should further be noted that the majority of PCNs issued are 'avoidable' PCNs.</p> <p>All motorists driving on the roads in England, Scotland and Wales are required to read the Highway Code, which is a set of driving and parking rules for motorists to follow. Many of these rules are legal requirements, and the Highway Code warns aspiring motorists that a failure to follow these rules can result in penalties, fines, endorsements on their licence, and in the most severe cases, criminal prosecution and imprisonment.</p> <p>All UK licence holders are legally required to study the Highway Code as part of their driver training, and they are also required to take and</p>				
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		<p>pass a theory exam on the Highway Code, before they are allowed to take their practical driving tests.</p> <p>PCNs are only issued where a motorist has parked illegally.</p> <p>If all motorists were to follow the driving and parking rules contained within the Highway Code, there would be no need for enforcement.</p> <p>All representations are considered on their own merit and mitigation may be taken into account in some circumstances.</p> <p>The enforcement of PCNs is a statutory process, and there is no provision within the legislation for a PCN to be paid in any time frame other than the legal time frames set out in the appropriate legislation.</p> <p>The policy of not allowing payments by instalments was last reviewed in 2013 and full details can be found on the councils website; https://www.merton.gov.uk/streets-parking-transport/parking/pcn/instalments</p>				
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		It is considered that the effects of the increase in PCN Banding charges would be of benefit to all equality groups as it will mean greater availability and turnover of parking spaces, and any negative impact on socio-economic equality groups can be justified on the basis that PCNs are only issued for illegal parking, and the motorist has a statutory right to appeal should they believe the PCN was issued incorrectly.				

Note that the full impact of the decision may only be known after the proposals have been implemented; therefore, it is important the effective monitoring is in place to assess the impact.

Stage 4: Conclusion of the Equality Analysis

8. Which of the following statements best describe the outcome of the EA (Tick one box only)

Please refer to the guidance for carrying out Equality Impact Assessments is available on the intranet for further information about these outcomes and what they mean for your proposal

Outcome 1 – The EA has not identified any potential for discrimination or negative impact and all opportunities to promote equality are being addressed.

☐

Outcome 2 – The EA has identified adjustments to remove negative impact or to better promote equality.

☒



Outcome 3 – The EA has identified some potential for negative impact or some missed opportunities to promote equality and it may not be possible to mitigate this fully.

☐

Outcome 4 – The EA shows actual or potential unlawful discrimination.

☐

Stage 5: Sign off by Director/ Head of Service

Assessment completed by		Signature: 	Date: 28 th January 2021
Improvement action plan signed off by Director/ Head of Service	Chris Lee – Director of Environment and Regeneration	Signature: <i>Chris Lee</i>	Date: 28 th January 2021

[REDACTED]

From: [REDACTED]@merton.gov.uk>
Sent: 28 June 2021 09:08
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: GLA's response re: Merton's band change
Attachments: Key Decision - Band B to Band A.pdf

Dear [REDACTED]

Thank you for your further email.

In response to the points raised;

- i. The proposal to move from Band B to Band A Parking charges within Merton was presented to the full council on Wednesday 5 February 2020 as item 16 on the agenda. Approval was granted, subject to consultation, and pending the results of the consultation, authority was granted for the Director for Environment and Regeneration (in consultation with the lead member) to take all necessary steps to give effect to the proposed change of band. Full details of the meeting of 5 February 2020 can be found by clicking [here](#).

Full details of the Chief Officer report, as well as approval for this application to be made, can be found by clicking [here](#).

I have also attached a copy of the signed Key Decision document for your records as well.

- ii. With regard to concerns that 'people in lower income groups may be more disproportionately affected by the proposal and their overall conclusion that there is no disproportionate impact on any protected group is therefore questionable' – the post consultation response on page 4 highlights that all motorists driving on the roads in England are required to study The Highway Code, and that parking PCNs are issued to motorists who do not adhere to these rules, which in many instances are legal requirements. This section also highlights that it is only the minority of vehicles that are parked illegally, with many of these contraventions occurring as a result of the motorists failure to adhere to the relevant parking rules. While it is accepted that an increased cost to PCN charges could have an impact on those on lower incomes, and as a result of wider inequalities, impact on BAME motorists as well, an increase in Parking PCN charges will only effect motorists who park, and persist in parking, their vehicles illegally.

Additional data provided by Transport for London(TfL Travel in London report 12) also highlighted that those in lower income groups, living in Outer London are less likely to own a vehicle, and as a result, there is less likely for there to be a disproportionate impact on these groups.

I hope that this serves to answer the points raised, and please do not hesitate to contact me if I can be of further assistance.

Yours sincerely

Parking Services

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 17 June 2021 20:13
To: [REDACTED] <[REDACTED]@merton.gov.uk>
Cc: [REDACTED] <[REDACTED]@merton.gov.uk>
Subject: RE: GLA's response re: Merton's band change

Hi both,

Thanks for following up. The legal team came back to me recently with a couple of minor outstanding queries as below:

- (1) In respect of the attached EqIA, it refers at Page 1 that the '*...full business case will need to be presented to Full Council. Following this, an application will be made to the London Council....*' Although the application was made to London Councils the business case was presumably made and approved? It just looks as though this document has not been updated. Can we presume the approval is minuted and, if so, where?
- (2) In respect of the EqIA itself, legal queried that in the analysis whilst thorough, there is a point that people in lower income groups may be more disproportionately affected by the proposal and their overall conclusion that there is no disproportionate impact on any protected group is therefore questionable. Given the Mayor's Public Sector Equality Duty, we are flagging this with you to note.

As far as I understand, these are the last outstanding issues before I can progress through to formal approvals.

Thanks,
[REDACTED]

From: [REDACTED] <[REDACTED]@merton.gov.uk>
Sent: 17 June 2021 18:29
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@merton.gov.uk>
Subject: RE: GLA's response re: Merton's band change

Hi [REDACTED]

I might have some mis-information, but our Cabinet Members believes there may have been some movement on this application.

Could you please let [REDACTED] and I know.

[REDACTED]
Can you give [REDACTED] a call in case these are not getting through.
Thank you.
[REDACTED]

[REDACTED] - London Borough of Merton
[REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 25 May 2021 16:26
To: [REDACTED] <[REDACTED]@merton.gov.uk>
Cc: [REDACTED] <[REDACTED]@merton.gov.uk>
Subject: RE: GLA's response re: Merton's band change

Hi [REDACTED]

I'm very sorry for the delayed response. It has indeed been an extremely busy start to the new term!

I can confirm that our legal team has been progressing with the draft MD, however I have yet to receive it from them so am unable to take through City Hall sign off. I have pressed again for a definitive timescale and will come back to you with this asap.

It does seem rather an arduous process but I do want to reassure you that I am keen to get this over the line and will keep you updated on progress.

Best wishes,
[REDACTED]

From: [REDACTED] <[REDACTED]@merton.gov.uk>
Sent: 24 May 2021 17:31
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@merton.gov.uk>
Subject: RE: GLA's response re: Merton's band change

Hi [REDACTED]

Sorry to trouble you again. Would you be able to contact [REDACTED] or I with an update at your earliest please.

Kind regards
[REDACTED]

[REDACTED] - London Borough of Merton
[REDACTED]

From: [REDACTED]
Sent: 13 May 2021 14:19
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: GLA's response re: Merton's band change

Good afternoon [REDACTED]

I hope the election went well for you all. I appreciate it's only a week ago, but I wonder if you are able to provide an update on our application.

Feel free to contact me if you have any questions or need any further information.

Kind regards,
[REDACTED]

[REDACTED] - London Borough of Merton
[REDACTED]

From: [REDACTED]@london.gov.uk>
Sent: 25 February 2021 10:35
To: [REDACTED]@merton.gov.uk>
Cc: [REDACTED]@london.gov.uk>
Subject: RE: GLA's response re: Merton's band change

Hi [REDACTED]

Thanks for your time this morning.

As explained, it is now looking like we will not be able to progress the decision before the pre-election period. I appreciate this is disappointing, so wanted to set out the process and limitations on progressing more quickly:

- We have one colleague able to process these decisions at the moment, among other workload, and have yet to receive a draft of the mayoral decision (MD).
- Once we have the MD, it needs to go through internal review by senior officers in my team, governance and finance.
- It then has to be formally approved by both the Deputy Mayor for Transport and our Executive Director before it can be submitted for consideration at our internal decision making board.
- The board's deadline is a week in advance of the meeting where the MD is reviewed. It is then submitted to the Mayor for approval but has to be approved by the Chief of Staff and another Executive Director before the Mayor considers.
- Depending on the decision and volume of other work, we normally assume at least a week after the Board before we're likely to have an approved MD (assuming of course the Mayor does approve the decision). Only at that point can the Mayor write to the Secretary of State.

All of this taken together means we normally assume about a month from having a draft MD to having secured Mayoral approval. Given the PEP starts in less than a month, that's why we've concluded that it won't be possible to progress in advance.

As mentioned, [REDACTED] can work with colleagues to progress the draft decision during the PEP. This would mean, assuming no change in administration, we could be ready to submit for Mayoral decision as soon as possible after the election, likely by late May. If there is a change in administration, of course, we would likely need to brief more fully before a decision were submitted so it would likely take longer.

I'm sorry again it's not been possible to progress it more quickly but hope this helps to explain the limitations. Thank you for your patience. [REDACTED] will keep in touch on progress during the PEP.

Kind regards

[REDACTED]

From: [REDACTED]@merton.gov.uk>
Sent: 25 February 2021 09:24
To: [REDACTED]@london.gov.uk>
Cc: [REDACTED]@london.gov.uk>
Subject: RE: GLA's response re: Merton's band change

Hi [REDACTED]

I would be grateful if either of you could give me a call on the number below.

Kind regards and thank you.

[REDACTED] - London Borough of Merton

From: [REDACTED]
Sent: 18 February 2021 14:34
To: [REDACTED] <[\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>
Cc: [REDACTED] <[\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>
Subject: RE: GLA's response re: Merton's band change

Hi [REDACTED]. And thank you for copying in [REDACTED].

Also thank you for your quick reply.

If you could explore with colleagues to progress in advance of the election we would be most grateful.

Kind regards

From: [REDACTED] <[\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>
Sent: 18 February 2021 14:24
To: [REDACTED] <[\[REDACTED\]@merton.gov.uk](mailto:[REDACTED]@merton.gov.uk)>
Cc: [REDACTED] <[\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>
Subject: RE: GLA's response re: Merton's band change

Dear [REDACTED]

Thanks for your email and the info attached. It hadn't reached me so grateful you've followed up.

We are now just a month away from the pre-election period, so I wanted to let you know we may not be able to process this decision until after the election. We aren't expecting to process this sort of decision within the pre-election period and given the process that we need to go through before this is presented to the Mayor for consideration it is quite tight to do before the PEP begins. I appreciate this will be disappointing and I am exploring with colleagues if it will be possible – I'll keep you updated on that.

[REDACTED] My colleague [REDACTED] copied, will be covering my absence so will be your contact for this in the coming months.

I'll let you know how we get on with progressing this decision before PEP, and failing that [REDACTED] will keep in contact on progress.

Thanks

From: [REDACTED] <[\[REDACTED\]@merton.gov.uk](mailto:[REDACTED]@merton.gov.uk)>
Sent: 18 February 2021 13:50
To: [REDACTED] <[\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>
Subject: RE: GLA's response re: Merton's band change

Hi [REDACTED]

I'm was just checking progress on this application but I cannot see a sent email with the information you requested. Apologies if have not received this.

Please see attached EIA with comments following consultation and with than updated date. Also clarification on what outcome 2 is described as, now shown on page 12.

Please feel free to give me a call if you have any questions.

Kind regards

[REDACTED] - London Borough of Merton

From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 21 January 2021 16:45

To: [REDACTED] <[REDACTED]@merton.gov.uk>

Cc: TT Correspondence [REDACTED] <[REDACTED]@london.gov.uk>; Chris Lee <[REDACTED]@merton.gov.uk>; [REDACTED]

[REDACTED] <[REDACTED]@merton.gov.uk>; [REDACTED] <[REDACTED]@merton.gov.uk>; [REDACTED]

[REDACTED] <[REDACTED]@londoncouncils.gov.uk>; [REDACTED] <[REDACTED]@londoncouncils.gov.uk>

Subject: RE: GLA's response re: Merton's band change

Dear [REDACTED]

Thank you for the further information. Having reviewed, there are two minor follow up points please:

- Page 9 states that 'Actions will be added once the consultation has been completed'. Has the EIA been updated as the consultation has been completed? The EIA is dated 28 January 2020 and marked draft so we were unclear if there is a later iteration.
- Page 12 of the EIA states that the Conclusion of the EIA is 'Outcome 2' however there is no explanation as to what Outcome 2 means. There is a reference to internal guidance on Merton's intranet which may explain what the different outcome categories mean. It would be helpful to have a brief explanation from Merton as to what Outcome 2 means.

In the meantime, we are now progressing a report on this matter for the Mayor to keep things moving, pending the above information which we'll require before submitting. It takes a bit of time for that to process internally given approvals required, but I will update you when it is ready to be submitted to the Mayor and on likely timing.

Kind regards

From: [REDACTED] <[REDACTED]@merton.gov.uk>

Sent: 06 January 2021 17:20

To: [REDACTED] <[REDACTED]@london.gov.uk>

Cc: TT Correspondence [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@londoncouncils.gov.uk>;

[REDACTED] <[REDACTED]@londoncouncils.gov.uk>; Tim Steer <[REDACTED]@london.gov.uk>; Chris Lee <[REDACTED]@merton.gov.uk>;

[REDACTED] <[REDACTED]@merton.gov.uk>; [REDACTED] <[REDACTED]@merton.gov.uk>; [REDACTED]

[REDACTED] <[REDACTED]@londoncouncils.gov.uk>; [REDACTED] <[REDACTED]@londoncouncils.gov.uk>

Subject: FW: GLA's response re: Merton's band change

Importance: High

Dear [REDACTED]

Please find below responses to the questions raised in your email of the 2nd November 2020. We trust this is the information you require, but if you require any further information, please do not hesitate to contact us. We remain keen to take this proposal forward, with as early implementation date as possible.

Responses:

1. EIA attached
2. 72% of respondents agreed more needed to be done to improve traffic flow, and 60% of respondents agreed that inconsiderate parking makes roads more dangerous. This indicates strong support for more action to be taken by the local authority to improve these issues, and improvement for these issues normally occurs as a result of enforcement. High levels of enforcement already take place, and despite increased numbers of PCNs being issued every year, significant numbers of motorists still park in contravention of the parking regulations in force, with there being a number of repeat offenders. It is unsurprising that only a low number of respondents believe an increased PCN cost would encourage compliance, however it is also clear that the current band B charges are not acting as a deterrent to many motorists. It is also unsurprising that only 22% of individuals support the change in PCN bands, as many motorists perceive the charges of PCNs to be unfair. It is also worth noting that motorists who follow the parking regulations in place do not receive PCNs, and it is only the minority of motorists who receive PCNs, many of which are avoidable.
3. Emails were sent to Lambeth, and Richmond and Wandsworth (shared service) on 3 November 2020, offering a further opportunity for comment on this proposal, and while an acknowledgement was received from Lambeth, as well as a request for sight of the chief officers report, to date, no further comments have been received from these authorities. I have attached copies of these communications, including a copy of the communication to Lambeth providing them with a copy of the chief officers report.

Kind regards

[REDACTED] - London Borough of Merton

From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 02 November 2020 12:18

To: [REDACTED] <[REDACTED]@londoncouncils.gov.uk>

Cc: TT Correspondence [REDACTED] <[REDACTED]@london.gov.uk>; Tim Steer [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@londoncouncils.gov.uk>

Subject: RE: Spencer's letter to Sadiq re: Merton's band change

Dear Spencer,

Thank you for your letter to the Mayor dated 23 October regarding a request from the London Borough of Merton to change the parking band in the borough.

Having now reviewed the documents provided, I am writing to request a copy of the Equality Impact Assessment carried out by Merton. This will help us to understand how Merton has paid due regard to the Public Sector Equality Duty and ensure the Mayor has appropriate information in considering this request.

It's also of note that Merton's report states that 'the results of [the consultation]... support the introduction of Band A charging across the whole borough.' However, the report also notes that 'The consultation results show that overall, 27.5% of respondents agreed that an increase in the cost of a PCN is an effective way of discouraging inconsiderate parking and with 22% of respondents agreeing to the proposal of a change in Merton's PCN band charges. It appears that the scheme is not supported by the majority of residents.' It would be helpful to understand the conclusion that the consultation supports this proposal given those findings.

We note that Merton has received no response from Richmond, Lambeth and Wandsworth in respect of the proposals, does this still remain the case?

I am also sorry to note that it seems very unlikely that a decision will be taken in time for implementation by 1 January 2021. I know this will be disappointing to the borough but I hope you can appreciate the process to be followed, as well as the current unprecedented circumstance we're working in, which make that a challenging timeline.

Kind regards,

[REDACTED]

[REDACTED]

Transport Team Manager, Transport, Infrastructure and Connectivity

GREATERLONDONAUTHORITY

City Hall, The Queen's Walk, London SE1 2AA

[REDACTED] (note auto forwarded to mobile telephone)

london.gov.uk

[REDACTED] [@london.gov.uk](mailto:[REDACTED]@london.gov.uk)

From: [REDACTED] [@londoncouncils.gov.uk](mailto:[REDACTED]@londoncouncils.gov.uk)>

Sent: 23 October 2020 11:15

To: [REDACTED] [@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>; Mayor <mayor@london.gov.uk>

Cc: Tim Steer [REDACTED] [@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>

Subject: Spencer's letter to Sadiq re: Merton's band change

Dear [REDACTED]

Please find attached Spencer Palmer's letter to Sadiq regarding Merton's band change which has also been emailed to Heidi. Grateful therefore if you could forward to Sadiq's attention as soon as possible and confirm receipt of this email plus attachments.

Thanks.

[REDACTED]

KEY DECISION TAKEN BY AN OFFICER UNDER DELEGATED AUTHORITY

See over for instructions on how to use this form – all parts of this form must be completed. Type all information in the boxes. The boxes will expand to accommodate extra lines where needed.

1. Title of report

Parking Penalty Charges (Approval of Band B to Band A) (Consultation) Report

2. Reason for exemption (if any)

Not applicable

3. Decision maker

Chris Lee, Director of Environment

4. Date of Decision

3 September 2020

5. Date report made available to decision maker

8 September 2020

6. Decision

- (1) To approve the increase in Penalty Charge Notice (PCN) charges from Band B to Band A
- (2) To submit the decision to London Councils and GLA for confirmation

7. Reason for decision

The move from Band B to Band A charges will result in increased compliance, contributing to traffic management objectives, and in addition, this will also help contribute towards the Council's strategic approach to improving air quality.

8. Alternative options considered and why rejected

The do nothing option (not increase charges) would not address the problem of motorists taking the risk to park in contravention. An increase in the PCN charge would have a greater effect on reducing illegal parking.

Consideration has been given to apply Band A, only at certain locations within the borough. However, the number of and location of PCNs issued throughout the borough remains high and PCN are issued regularly between the hours of 7am to 11pm.


9. Documents relied on in addition to officer report

- (1) Council Report approved on 5 February 2020

10. Declarations of Interest

None

11. Signature

Signature: 	Date: 03 09 2020
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12. Publication of this decision and call in provision

Send this form and the officer report to democratic.services@merton.gov.uk for publication. Publication will take place within two days. The call-in deadline will be at Noon on the third working day following publication.

IMPORTANT – this decision should not be implemented until the call-in period has elapsed.