

London Councils' Transport and Environment Committee

Additional Parking Charges for the London Borough of Brent

Item No:

Report by: [REDACTED] **Job title:** Transport Officer
Date: 10 June 2021
Contact Officer: [REDACTED]
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Summary: This report details the proposal by the London Borough of Brent (LB Brent) to amend the penalty charge banding from Band B to Band A across the borough.

Recommendations: Members are asked to note and discuss the following recommendations. All decisions will be made following the meeting under the Committee's urgency procedure:

- Approve the proposal to change the penalty banding in the LB Brent
- Note the proposed implementation date for the change is the latter part of 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 Under the provisions set out in the Traffic Management Act 2004 (Schedule 9), which repealed similar provisions in the Road Traffic Act 1991, London Councils' Transport and Environment Committee is responsible, subject to agreement by the Mayor of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 Brent Proposals for Change:

8. LB Brent is proposing to change from being Band B and to Band A across the whole borough (*please see Appendix 1 of this report for full details*).
9. Over 50% of the borough has a range of parking controls in place, predominantly located in and around residential and shopping areas, and major transport hubs with further loading and waiting restrictions strategically placed at various locations outside of the CPZs. There are also additional restrictions applicable to the extensive Wembley Stadium Protected Parking Scheme Zone.

10. LB Brent has indicated that despite deploying a robust parking and traffic enforcement regime - which includes Civil Enforcement Officers and CCTV cameras, the borough continues to experience an increase in levels of non-compliance with its parking regulations.
11. *Figure 3* contained within LB Brent's application (*please see Appendix 1 of this report*) indicates that between 2017/18 and 2019/20, the total number of on-street parking Penalty Charge Notices (PCNs) issued each year has increased from 112,265 to 124,345 which equates to a 10.8% increase; with London as a whole seeing an increase of 7.8% during the same period.
12. *Figure 3 (please see Appendix 1 of this report)* contained within LB Brent's application illustrates how the borough's issuance levels have compared during the periods 2017/18 to 2019/20 for Band A and Band B contraventions. Band B issuance shows a significantly higher trend than Band A, indicating that LB Brent is experiencing a higher level of non-compliance in their Band B areas.
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 Brent believes that some of this risk can be countered with a change to the penalty band which increases the deterrent.
14. 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 Brent, 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 Brent has boundaries with LB Barnet, LB Camden, City of Westminster, LB Ealing, LB Hammersmith & Fulham, LB Harrow and Royal Borough (RB) of Kensington & Chelsea.
15. LB Camden, City of Westminster, LB Ealing, LB Hammersmith & Fulham and RB Kensington & Chelsea is already Band A, so any shared boundaries with LB Brent will not impact the ability for LB Brent to enforce Band A.
16. Any boundary roads in LB Barnet and LB Harrow that are currently being enforced as a Band B due to a boundary with LB Brent will be enforceable as a Band A once final approval has been received and the new banding regime commences.

Timetable for Implementation

17. 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. The boroughs involved would then need to advertise their proposed changes for at least three weeks prior to implementation. Although LB Brent have not proposed a date for implementation, from previous experience, this process takes around three months in total and so London Councils propose that LB Brent should be in a position to implement this change in the latter part of 2021.

Financial Implications

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

Legal Implications

19. 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

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

Recommendations: Members are asked to note and discuss the following recommendations. All decisions will be made following the meeting under the Committee's urgency procedure:

- Approve the proposal to change the penalty banding in the LB Brent
- Note the proposed implementation date for the change is the latter part of 2021

Appendices

Appendix 1: LB Brent - Application to Change the Banding Level from Band B to Band A.
Appendix 2: Existing London-wide On-street Penalty Charge Bands Map
Appendix 3: LB Brent - PCN Banding Equalities Analysis



Transport and Environment Committee

London Councils

59½ Southwark Street

London

SE1 0AL

28th May 2021

To the Transport and Environment Committee of London Councils

RE: Application to amend the Penalty Charge Notice Banding scheme in the London Borough of Brent

The London Borough of Brent is seeking an agreement from the Transport and Environment Committee (TEC) to amend the borough's Penalty Charge Notice (PCN) banding scheme from the current mix of Band A/B, to Band A.

This letter is our formal application for TEC to consider this proposal.

Current Banding

The London Borough of Brent is a mixed Band A/Band B borough for parking offences. This means in effect that different penalty amounts are charged for the same offence dependent on the location of the offence within the borough.

Fig 1 – Band Breakdown

| |
|---|
| Band A 1. All roads in the Wembley Event Day Protective Parking Scheme Area (at all times and not only on Wembley Event Days). 2. Harrow Road between Greyhound Road and Kilburn Lane. |
| Band B All remaining streets in the London Borough of Brent. |

In all instances, the 14-day 50% discount rule applies, and the full and discounted amounts are shown below.

This proposal would see Brent move fully to Band A and the associated higher level of charges. In effect this would increase the charge for Band B PCNs at the discount amount by £10 (the rate that the majority are settled at), and by £20 at full charge.

Fig 2 – Parking PCN Banding Amounts

| PCN Level | Band | Higher charge | Discount higher charge | Lower charge | Discount lower charge |
|------------------|-------------|----------------------|-------------------------------|---------------------|------------------------------|
| Band A | | £130 | £65 | £80 | £40 |
| Band B | | £110 | £55 | £60 | £30 |

Background:

In recent years Brent has experienced a substantial increase in the demand placed on its parking spaces both on and off-street. In parallel with this increased demand, we have also experienced an increase in non-compliance with parking restrictions. This has manifested itself in an increasing number of parking PCNs being issued year on year.

In the three years between 2017/18 and 2019/20, parking PCN levels have risen by 10.8% (Fig 3 below). Across the rest of London, the increase for the same period was 7.8%. Critically, within Brent, the number of Band A PCNs issued has remained relatively static, dropping by just over one percent. In comparison, the number of Band B PCNs issued has increased substantially by almost twenty-five percent.

In 2018, the parking service changed its notice processing software system from SiDem to Taranto. During the migration process, only skeletal data for the period up to March 2017 was transferred across to the new system. This data set did not include the charge Band information. The service therefore does not have information on the charge Band breakdown for PCNs issued prior to April 2017.

In 2015/16, 100,136 PCNs were issued for parking contraventions. In 2016/17, 105,584 PCNs were issued for parking offences, a 5% increase. In the three subsequent years, PCN issuance for parking contraventions continued to increase, with clear evidence that the growth in contraventions can be entirely attributed to the areas covered by Band B.

Fig 3 –PCN Issuance by Band

| Parking PCNs | 2017/18 | 2018/19 | 2019/20 | Variance as Percentage |
|--------------|---------|---------|---------|------------------------|
| Band A | 60,406 | 63,262 | 59,680 | -1.2% |
| Band B | 51,859 | 55,090 | 64,665 | 24.7% |
| Total | 112,265 | 118,352 | 124,345 | 10.8% |

There appears to be no operational explanation for this split. Some of the increase could be due to improved detection by the enforcement team. However, that would most likely apply equally to both Band A & B areas. The more likely reason is simply due to the decreasing deterrent effect of the value of the Band B PCN.

Within the overall increase in Band B PCNs of 25%, we also note some concerning individual trends:

- Loading Restriction offences have increased in Band B areas by 194% while only increasing by 3% in Band A areas.
- Dropped Kerb offences have increased in Band B areas by 288% while reducing by 8% in Band A areas.
- Bus Stop offences have increased in Band B areas by 21% while reducing by 25% in Band A areas.
- Pedestrian Crossing offences have increased in Band B areas by 61% while reducing by 9% in Band A areas.

These offences are of concern because of the obstructive or safety-related impacts they have. There is a definite bias towards greater compliance in Band A areas in respect to these offences.

There were additional notable increases in the Band B area for the following offences.

- 40% in Disabled Bay Offences
- 113% in Double Parking Offences
- 151% in Footway Parking Offences

Again, these offences carry a high anti-social tariff and cause great inconvenience.

Covid Impact: During 2020/21, lockdowns associated with the Covid pandemic response led to a significant reduction in motoring activity. For this reason, 2020/21 has not been used as a comparator year for the PCN issuance analysis. For information, parking PCN issuance during 2020/21 was: 29,687 PCNs for Band A; and 78,754 PCNs for Band B. The substantial drop in Band A PCNs reflects the impact of lock-downs on high street activity, and the lack of major events at Wembley Stadium. The continued growth in Band B PCNs, even during periods of lockdown, is a concern and reinforces the argument that the Band B Penalty Charge is no longer a sufficient deterrent.

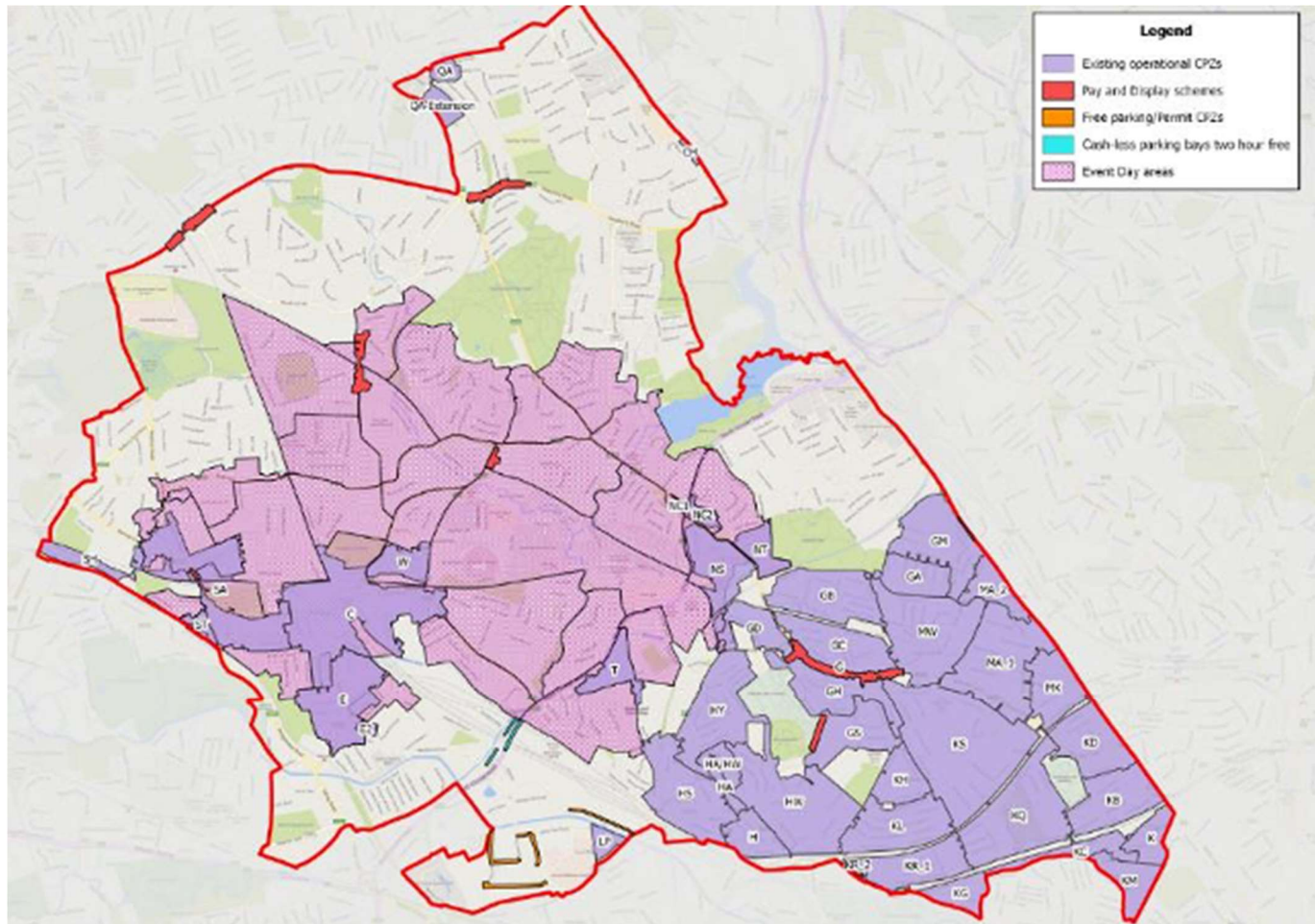
Enforcement Context:

Over half of the borough's area has some type of parking control in place. These restrictions are typically located in and around residential areas, transport hubs and shopping areas. When major events are held at Wembley Stadium, additional restrictions apply to the extensive Wembley Stadium Protected Parking Scheme Zone.

Serco PLC manages parking enforcement on behalf of the Council, primarily through Civil Enforcement Officers. CCTV assets are also used to enforce bus stops and school Keep Clear markings. Since April 2015, these have been the only parking contraventions enforced by CCTV. The year-on-year comparisons set out above are therefore consistent. Fig 4 gives an overview of the CPZ network in Brent.

Fig 4 - Map of Brent

The London Borough of Brent is an outer London borough, covering an area of almost 17 square miles. It is bordered by the London Boroughs of Barnet to the north-east, Harrow to the northwest and Ealing to the southwest. It has short boundaries with the central London Boroughs of Camden, Westminster, Hammersmith and Fulham, and Kensington and Chelsea, in the south-east.



Consultation:

The Council carried out a two-stage consultation process.

1. Online public consultation commencing 7th September, and ending on 5th October 2020
2. Direct consultation with neighbouring boroughs that may be impacted by the change

1. Online Public Consultation

The Council pro-actively contacted over 51,000 parking account holders, registered residents associations, business associations and places of worship who received an email detailing the proposed changes. The email contained a direct link to the consultation portal to complete the online questionnaire.

Different approaches to raise awareness of the consultation included weekly updates on social media platforms, a link to the consultation from the Council's website home page and the parking page, an article in The Brent Magazine (distributed to households on 15th September) and electronic circulation of the Brent e-newsletter. Members received notification of the consultation via the Members Bulletin on 4th September.

During the consultation, both The Kilburn Times and The Harrow Times published an article on the proposal and informed readers of the consultation.

There were 1,368 respondents to the consultation from the 51,000 parking account holders contacted, a response rate of less than 3%. In summary the responses were:

- Agreed 23%
- Disagreed 71%

The balance of 6% was a mix of Neither Agree/Disagree, Don't Know or Not Answered.

As with other authorities, Brent often receives a low level of support for parking related charge increases, with many respondents expressing concerns that the proposals are motivated by a desire to raise revenue rather than manage parking and traffic flow. A sample of 275 responses of those opposed to the proposals was analysed. 88 of these responses (32%) expressed this specific concern about the measure being principally motivated by financial considerations.

However, there is no legal basis on which local authorities can consider any increase in parking-related fees or charges for the purpose of raising revenue.

The sole purpose of the proposals is to deter parking contraventions. Our forecast is that this will lead to fewer PCNs being issued in the former Band B areas and we project a net-zero impact on parking PCN revenue. This directly addresses the most common concern expressed by respondents to the consultation.

The Council remains of the view that the proposal to move the whole borough to Band A will assist in the better management of parking spaces within the borough, help ensure that the highway network can operate effectively and also support independent travel by members of the public, particularly those with mobility impairments.

- The Band A penalty will have a more significant deterrent effect than the Band B penalty.
- This is demonstrated by the recent growth in contraventions in Band B areas in comparison to Band A areas

- Neighbouring boroughs are moving to Band A, which could leave Brent in an anomalous position and more vulnerable to illegal parking.
- The geographical boundary between Band A and Band B areas in Brent, set over a decade ago, can no longer be justified and is administratively complex and inefficient.

2. Direct consultation with neighbouring boroughs

The Council contacted all its direct neighbouring boroughs. No objections or adverse comments were received in respect of the proposal.

Boundary Roads

Brent has boundaries with seven other London Boroughs:

- Barnet (Band B)
- Camden (Band A)
- City of Westminster (Band A)
- Ealing (Band B)
- Hammersmith & Fulham (Band A)
- Harrow (Band B)
- Kensington & Chelsea (Band A)

The treatment of boundary roads for the existing four Band A boroughs would be a more straightforward matter for all boroughs if the change were to be approved, as all boundary roads boroughs would now be fully in Band A. This would represent a simplification in the enforcement of boundary roads with these councils.

Of the three Band B boroughs, Brent understands that two (Barnet & Ealing) have already made Band A applications. Assuming these applications are also granted this again would lead to a very straightforward boundary road arrangement.

The remaining Band B outer London borough, Harrow, has a relatively small number of shared roads with Brent. Brent had already carried out an initial desktop survey of the affected streets and has not observed anything that would cause difficulty in complying with the traditional treatments for such roads.

Should the Transport and Environment Committee approve our application, Brent will provide an additional resource to work with London Councils officers to produce a detailed schedule of treatment for approval by the Mayor of London's Office.

Equalities

Section 149 of the Equality Act 2010 provides that the Council must have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between those who share a protected characteristic, and those who do not. In accordance with Brent's approach to the assessment of equalities impacts, a preliminary analysis was undertaken.

An Equalities Analysis is attached to this application. No significant adverse implications have been identified in the proposal to move all PCNs to Band A. There is no evidence that motorists from any of the equalities groups with protected characteristics are more likely to incur PCNs than the general motoring population.

A reduction in parking contraventions would be of particular benefit to disabled motorists, who have a greater need to park legally closer to their home or destination. Disabled people will particularly benefit if we are able to reduce disabled bay parking contraventions, and this group of motorists and passengers are also more likely to be older.

There would also be a positive impact on those equalities groups who are more likely to be pedestrians or public transport users if we are able to reduce footway and bus stop parking contraventions. Several equalities groups are more likely to be pedestrians and bus users - for example children.

Conclusion:

In locations with greater demand and higher levels of parking pressure, an increased level of penalty will act as a deterrent to stem the increasing number of parking contraventions in the borough - the reasoning behind the two banding levels in London in the first instance.

With Brent experiencing significant parking pressure across the borough, which in turn is resulting in increasing levels of non-compliance, banding needs to be addressed.

Moving the remaining Band B locations to Band A will increase the deterrent effect of PCNs in those areas and in turn increase compliance, an outcome that is core to the reasons for enforcing the restrictions in the first place.

Request:

It is requested that London Councils' TEC agree to the change moving all of the London Borough of Brent's remaining Band B PCN zones to Band A, to achieve the outlined compliance goals above.

With TEC's approval, London Councils and Brent officers will be able to agree on timescales for advancing this request to the Greater London Authority, and then onwards to the Secretary of State.

Please do not hesitate to contact me if you require any clarification or additional information on this proposal.

Yours sincerely

[REDACTED]

[REDACTED]

Head of Parking & Lighting
London Borough of Brent

*Enc. (i) Delegated Authority Report – Parking PCN Banding
(ii) Equality Analysis - Parking Penalty Charge Notices – Borough-wide
Banding.*

Appendix 1 - Consultation Summary

Consultation: Distribution of Responses

The online consultation provided detailed background information and statistics on the proposal. The questionnaire intended to capture the responses of the consultees and, as such, was structured to ask three questions, one of which was the critical question on the proposed change. A further three questions provided an opportunity for individual comments and opinions to be expressed as free text.

There were 1,368 respondents to the consultation from the 51,000 parking account holders contacted, a response rate of less than 3%. The responses are summarised below:

Q1: *To what extent do you agree or disagree that further action from the Council is required to discourage illegal parking offences in the Band B area.*

| Option | Total | Percent |
|---------------------------|-------|---------|
| Strongly agree | 231 | 16.89% |
| Tend to agree | 147 | 10.75% |
| Neither agree or disagree | 76 | 5.56% |
| Tend to disagree | 137 | 10.01% |
| Strongly disagree | 766 | 55.99% |
| Don't know/Can't Say | 11 | 0.80% |
| Not Answered | 0 | 0.00% |

Q2: *Please let us know the reasons for your answer:*

There were 1,131 responses to this part of the consultation.

On the question of '*To what extent do you agree or disagree that further action from the Council is required to discourage illegal parking offences in the Band B area*'

28% of respondents supported further action, 5% had no strong view and 66% opposed

Responses were analysed, with common themes emerging summarised below:

Respondents that were in agreement:

- Illegal parking is dangerous and a safety concern
- We should do more to deter illegal parking in residents' parking spaces
- More deterrent is needed, with so many cars parking
- Illegal parking and bad parking prevents access to properties
- Illegal parking leaves disabled persons at a more significant disadvantage in finding a space

- Provides a fair approach for residents who pay for permits
- Will reduce the number of illegally parked vehicles.

Respondents that were opposed:

- It is just a means to raise additional revenue for the Council
- Motorists are an easy target and punished as such.
- Changes will make a difference to the way in which motorists park
- It will create an impact on local business.
- The current penalty charges are fair and provide a good level of deterrent.
- Provide more parking spaces to reduce illegal parking

Q3: To what extent do you agree or disagree that increasing the amount of the Band B Penalty Charge Notice to the Band A amount is an effective way of discouraging parking offences?

| Option | Total | Percent |
|---------------------------|-------|---------|
| Strongly agree | 139 | 10.16% |
| Tend to agree | 132 | 9.65% |
| Neither agree or disagree | 76 | 5.56% |
| Tend to disagree | 129 | 9.43% |
| Strongly disagree | 879 | 64.25% |
| Don't know/Can't say | 13 | 0.95% |
| Not Answered | 0 | 0.00% |

Q4: Please let us know the reasons for your answer:

There were 1,045 responses to this part of the consultation.

On the question of 'To what extent do you agree or disagree that increasing the amount of the Band B Penalty Charge Notice to the Band A amount is an effective way of discouraging parking offences';

20% of respondents supported the proposal, with 74% opposed.

Responses were analysed, with common themes emerging summarised below:

Respondents that were in agreement:

- Increased fines could work as a deterrent
- Any additional measures are worth trying as the situation is getting worse
- Fines must be substantial and enforceable
- Single borough-wide charge is fairer
- There is a wrong belief that motorists are not doing anything wrong when parking illegally, so we need more deterrents
- Motorists will more likely comply and improve parking for everyone

Respondents that were opposed:

- Is a means for the Council to raise revenue
- Small increase will not deter drivers parking illegally
- Motorists that park illegally know they risk a fine so a small increase will not discourage more of them
- Provide more parking spaces instead
- The current value of a PCN is enough of a deterrent

Q5: Key Question: To what extent do you support or oppose the proposal to change Brent's Band for parking offences from Band A / B to Band A?

| Option | Total | Percent |
|----------------------------|-------|---------|
| Strongly support | 181 | 13.23% |
| Somewhat support | 94 | 6.87% |
| Neither support nor oppose | 62 | 4.53% |
| Somewhat oppose | 130 | 9.50% |
| Strongly oppose | 901 | 65.86% |
| Not Answered | 0 | 0.00% |

There were 1,057 responses to this part of the question.

On the question of 'To what extent do you support or oppose the proposal to change Brent's Band for parking offences from Band A / B to Band A?';

20% of respondents supported the proposal, with 75% opposed.

Responses were analysed, with common themes emerging summarised below:

Respondents that were in agreement:

- Increased fines could work as a deterrent
- Any additional measures are worth trying as the situation is getting worse
- Fines must be substantial and enforceable
- Single borough-wide charge is fairer
- There is a wrong belief that motorists are not doing anything wrong when parking illegally, so we need more deterrents
- Motorists will more likely comply and improve parking for everyone

Respondents that were opposed:

- Is a means for the Council to raise revenue
- Small increase will not deter drivers parking illegally
- Motorists that park illegally know they risk a fine so a small increase will not discourage more of them
- Provide more parking spaces instead
- The current value of a PCN is enough of a deterrent

Q6: *In your opinion, what other measures can be useful in discouraging parking offences?*

Responses were analysed, with common themes emerging summarised below:

Respondents thought the following measures could discourage illegal parking:

- Improved signage and line marking
- lower parking tariffs and permit prices
- More parking spaces
- Improved enforcement
- Focus more on serious offences and not on minor overstay in paid for parking
- Provide more information to motorists on parking restrictions

Appendix 2: Existing London-wide On-Street Parking Charge Bands Map

Existing on-street penalty charge bands



LB BRENT EQUALITY ANALYSIS (EA)

| | |
|-------------------------|---|
| POLICY/PROPOSAL: | Parking Penalty Charge Notices: Borough-Wide Banding |
| DEPARTMENT: | Environmental Services |
| TEAM: | Parking & Lighting |
| LEAD OFFICER: | |
| DATE: | 24/05/2021 |

NB: Please ensure you have read the accompanying EA guidance and instructions in full.

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary of its objectives and the intended results.

This proposal considers moving all Brent parking Penalty Charge Notices (PCNs) to the higher Band 'A' level borough-wide. Band 'A' currently applies only in Wembley (and a section of Harrow Road), with Band 'B' applied to all remaining highways in the borough.

The objective of the proposal has arisen from the fact that this geographic boundary can no longer be justified in respect of the need for parking enforcement, given the level of contraventions observed in all Brent CPZs. Additionally there is a concern that parking contraventions may increase if commuters switch back to private car use instead of using public transport, following the Covid health emergency.

The intended results of any parking enforcement operation should be to gain and maintain compliance with the controls and restrictions. In the past three years, there has been a substantial increase in the instances of non-compliance detected in band B areas, with the table below showing the number of PCN's issued to vehicles parked illegally:

| Parking PCNs | 2017/18 | 2018/19 | 2019/20 | Variance as Percentage |
|---------------------|----------------|----------------|----------------|-------------------------------|
| Band A | 60,406 | 63,262 | 59,680 | -1.2% |
| Band B | 51,859 | 55,090 | 64,665 | 24.7% |
| Total | 112,265 | 118,352 | 124,345 | 10.8% |

2. Who may be affected by this policy or proposal?

This change will impact on pedestrians, cyclists and motorists within the current Band B area, who will benefit from a reduction in illegal parking due to the greater deterrence provided by Band A penalties.

It will impact on the driver or keeper of any vehicle that receives a Penalty Charge Notice for illegal parking within the current Band B area. They will see an increase of at least £10 in the amount they can settle a Penalty Charge Notice for.

Several groups should see a particularly positive impact from this change as compliance improves.

They would include:

- Disabled Motorists – as non-compliant parking in Disabled Bays will carry a higher penalty and therefore be discouraged to a greater degree.
- Bus Users – as illegal parking at bus stops will carry a higher penalty and therefore be discouraged to a greater degree, reducing the incidents where buses are unable to pull to the kerb. In turn this will reduce the inconvenience experienced by wheelchair users, pushchair/buggy users and the elderly.
- Pedestrians, particularly wheelchair users and pushchair/buggy users - as illegal parking on footways will carry a higher penalty and therefore be discouraged to a greater degree, reducing the instances that they will have to manoeuvre around illegally parked cars.

Several Equalities groups are more likely to be pedestrians or bus users, for example many Black and Minority Ethnic people, women and children.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Section 149 of the Equality Act 2010 provides that the Council must have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between those who share a protected characteristic, and those who do not.

In accordance with Brent's approach to the assessment of equalities impacts a preliminary analysis was undertaken and no significant adverse implications have been identified in the proposal to move all PCNs to Band A.

There is no evidence that motorists from any of the equalities groups with protected characteristics are more likely to incur PCNs than the general motoring population.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

| Characteristic | Impact Positive | Impact Neutral/None | Impact Negative |
|------------------------|-----------------|---------------------|-----------------|
| Age | X | | |
| Sex | X | | |
| Race | X | | |
| Disability * | X | | |
| Sexual orientation | | X | |
| Gender reassignment | | X | |
| Religion or belief | | X | |
| Pregnancy or maternity | X | | |
| Marriage | | X | |

5. Please complete **each row** of the checklist with an “X”.

Screening Checklist

| | YES | NO |
|---|-----|----|
| Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty? | X | |
| Does the policy or proposal relate to an area with known inequalities? | | X |
| Would the policy or proposal change or remove services used by vulnerable groups of people? | | X |
| Has the potential for negative or positive equality impacts been identified with this policy or proposal? | X | |

If you have answered YES to ANY of the above, then proceed to section B.

If you have answered NO to ALL of the above, then proceed straight to section D.

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis.
If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

In recent years Brent has experienced a substantial increase in the demand placed on its parking spaces both on and off-street. In parallel with this increased demand, we have also experienced an increase in non-compliance with parking restrictions. This has manifested itself in an increasing number of parking PCNs being issued year on year.

In the three years between 2017/18 and 2019/20, parking PCN levels have risen by 10.8%. Across the rest of London, the increase for the same period was 7.8%. Critically, within Brent, the number of Band A PCNs issued has remained relatively static whilst evidence shows that the number of Band B PCNs issued has increased substantially by almost twenty-five percent.

Within the overall increase in Band B PCNs of 25%, we analysed concerning trends such as bus stop offences had increased in Band B areas by 21% while reducing by 25% in Band A areas. These offences are of concern because of the obstructive or safety-related impacts they have. There is a definite bias towards greater compliance in Band A areas in respect to these offences. There were additional notable increases in the Band B area for the following offences such as 40% increase in Disabled Bay Offences, 113% in Double Parking Offences and 151% in Footway Parking Offences.

The data sets and the analysis of the data for the proposed change has provided the evidence that there would be a positive impact on those equalities groups who are more likely to be pedestrians or bus users if we are able to reduce footway and bus stop parking contraventions. Several equalities groups are more likely to be pedestrians and bus users - for example children. On this evidence, no negative impacts were identified, and several positive impacts are forecast.

2. For each “protected characteristic” provide details of all the potential or known impacts identified both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE

| | |
|--------------------------------------|--|
| Details of impacts identified | <p>If a particular person is wholly or mostly dependent on car or vehicular travel (e.g., older people and/or people with a significant mobility impairment), this proposal is expected to have a <i>Positive</i> impact as the increased penalty will most likely drive higher compliance in Disabled Bays, the majority of which are used by older people.</p> <p>The impact on children is expected to be <i>Positive</i>. Road safety in the residential area is expected to be improved with greater compliance with the parking regulations, allowing more walking and cycling in the area. For those who are able to walk and cycle and choose to utilise active travel modes, the scheme is expected to be <i>Positive</i> with an associated lower road safety risk. Children are also more dependent on buses.</p> |
|--------------------------------------|--|

DISABILITY

| | |
|--------------------------------------|---|
| Details of impacts identified | <p>If a particular person is wholly or mostly dependent on car or vehicular travel (e.g., older people with a significant mobility impairment), this proposal is expected to have a <i>Positive</i> impact.</p> <p>A reduction in parking contraventions would be of particular benefit to disabled motorists, who have a greater need to park legally closer to their home or destination. Disabled people will particularly benefit if we</p> |
|--------------------------------------|---|

| | |
|--|--|
| | <p>are able to reduce disabled bay parking contraventions, and this group of motorists and passengers are also more likely to be older.</p> <p>Wheelchair users will benefit from a reduction in footway parking contraventions.</p> |
|--|--|

RACE

| | |
|--------------------------------------|---|
| Details of impacts identified | <p>Data suggests that the BAME population is less likely to own a private motor vehicle and more likely to use the local bus network. This proposal is likely to have a positive impact on the efficient running of the bus network, facilitating faster journey times and thereby having a <i>Positive</i> impact on the users of the service.</p> |
|--------------------------------------|---|

SEX

| | |
|--------------------------------------|---|
| Details of impacts identified | <p>Data suggests that women are less likely to have access to a private motor vehicle and more likely to use the local bus network. This proposal is likely to have a positive impact on the efficient running of the bus network, facilitating faster journey times and thereby having a <i>Positive</i> impact on the users of the service.</p> |
|--------------------------------------|---|

SEXUAL ORIENTATION

| | |
|--------------------------------------|---|
| Details of impacts identified | <p>There is no clear evidence, data or rationale to expect that this proposal will have a differential impact on people with this characteristic.</p> |
|--------------------------------------|---|

PREGNANCY AND MATERNITY

| | |
|--------------------------------------|---|
| Details of impacts identified | <p>Mothers with buggies will benefit from a reduction in footway parking contraventions.</p> <p>While this group <i>may</i> have a greater reliance on the car due to some potential reduced mobility issues, no data would suggest that they are at a greater risk of receiving a Penalty Charge Notice.</p> |
|--------------------------------------|---|

RELIGION OR BELIEF

| | |
|--------------------------------------|--|
| Details of impacts identified | <p>The council already has a well-developed system for facilitating parking at places of worship, in particular during religious festivals and events with details of the operational practices highlighted in the Parking Policy 2020. Improved compliance with the prevailing parking restrictions will mean that motorists that are eligible to park under these arrangements may find it easier to find a space if compliance is higher.</p> |
|--------------------------------------|--|

GENDER REASSIGNMENT

| | |
|--------------------------------------|---|
| Details of impacts identified | <p>There is no clear evidence, data or rationale to expect that this proposal will have a differential impact on people with this characteristic.</p> |
|--------------------------------------|---|

MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified

There is no clear evidence, data or rationale to expect that this proposal will have a differential impact on people with this characteristic.

3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No impact has been identified that would be considered unlawful under the Equality Act 2010

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Yes. The Council pro-actively contacted over 51,000 parking account holders, registered residents associations, business associations and places of worship who received an email detailing the proposed changes with an opportunity to complete an online or postal consultation on the proposal. Furthermore, different approaches were utilised to raise awareness of the consultation across the borough that included weekly updates on social media platforms, a link to the consultation from the Council's website home page and the parking page, an article in The Brent Magazine (distributed to households on 15th September) and electronic circulation of the Brent e-newsletter.

5. Please detail any areas identified as requiring further data or detailed analysis.

No further data or analysis is currently foreseen.

6. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

The back office team who deal with Pre-Notice To Owner challenges and Formal Representations will receive training to allow them to identify any issues arising from this change.

7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

Monitoring will include collection of data on the number of PCN's issued, the number of PCN challenges and through the councils complaint system.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

In locations with greater demand and higher levels of parking pressure, an increase in the value of Penalty Charge Notices will act as a deterrent to stem the increasing number of parking contraventions in the borough - the reasoning behind the two banding levels in London in the first instance.

With Brent experiencing significant parking pressure across the borough, which in turn is resulting in increasing levels of non-compliance, banding needs to be addressed.

Moving the remaining Band B locations to Band A will increase the deterrent effect of PCNs in those areas and in turn increase compliance, an outcome that is core to the reasons for enforcing the restrictions in the first place.

SECTION D – RESULT

Please select one of the following options. Mark with an "X".

| | | |
|----------|--|----------|
| A | CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED | X |
| B | JUSTIFY AND CONTINUE THE POLICY/PROPOSAL | |
| C | CHANGE / ADJUST THE POLICY/PROPOSAL | |
| D | STOP OR ABANDON THE POLICY/PROPOSAL | |

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

| Action | Expected outcome | Officer | Completion Date |
|---------------|-------------------------|----------------|------------------------|
| | | | |
| | | | |
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SECTION F – SIGN OFF

Please ensure this section is signed and dated.

| | |
|--|-----------------------------|
| OFFICER: | ██████████, Policy Manager |
| REVIEWING OFFICER: | ██████████ Head of Service |
| HEAD OF SERVICE / Operational Director: | ██████████, Head of Service |

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: 14 July 2021

Dear Mr Khan,

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

On 10 June 2021, London Councils' Transport and Environment Committee (TEC), considered a proposal for changing the level of Additional Parking Charges applicable on borough roads in the London Borough of Brent. In accordance with the relevant legislation, TEC have instructed me to seek your approval for a change to these charges.

The report considered by the Committee in reaching its decision is attached to this letter and can also be found on our website.

The report sets out Brent's proposal to change from penalty charge Band B to Band A 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 banding change set out above in accordance with the Traffic Management Act 2004.

Brent do not have an implementation date for the new banding if this change is approved, however they are hopeful that the revised charges could be introduced later this year. It would be beneficial therefore, if you were able to consider this matter at the earliest opportunity so the legal process can continue.

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

Yours sincerely,



Spencer Palmer
Director, Transport and Mobility

cc: Heidi Alexander – Deputy Mayor for Transport

[REDACTED]

From: [REDACTED]@londoncouncils.gov.uk>
Sent: 08 September 2021 15:39
To: [REDACTED]
Cc: [REDACTED]; TT Correspondence
Subject: Spencer's letter to Sadiq re: Brent's band change (Update)

Dear [REDACTED]
Following my email below, Brent will provide the requested information directly to you. Therefore grateful if you could let me know once received or whether we have to chase them.
Thanks.
[REDACTED]

From: [REDACTED]
Sent: 08 September 2021 11:05
To: [REDACTED]@london.gov.uk>
Cc: [REDACTED]@london.gov.uk>; TT Correspondence [REDACTED]
Subject: Spencer's letter to Sadiq re: Brent's band change

Dear [REDACTED],
Thanks for your email. Following your email, just to let you know that we have requested the additional information from Brent and will forward to you once received.
Regards.
[REDACTED]

From: [REDACTED]@london.gov.uk>
Sent: 07 September 2021 09:06
To: [REDACTED]@londoncouncils.gov.uk>
Cc: [REDACTED]@london.gov.uk>; TT Correspondence [REDACTED]
Subject: RE: Spencer's letter to Sadiq re: Brent's band change

Dear [REDACTED]
In response to Spencer's letter to Sadiq, we have now reviewed Brent's application and considered the evidence provided against the criteria for a Mayoral Decision. We note that Brent has provided some analysis of their consultation responses, but has Brent produced a more detailed report or response to the consultation given that support for the proposal is low? We note from the EqIA that Brent did not consider there to be negative impacts on any group with a protected characteristic. Please could Brent provide more information on what sort of consultation responses they received from anyone with a protected characteristic so that we can be satisfied that no negative impact has been identified by them which should be taken into account?
Could you request this additional information from Brent? I am happy to contact the relevant officer direct if you prefer.

In the meantime, our legal team will progress with drafting a Mayoral Decision with the information provided and amend it once this additional information is received.

Kind regards,
[REDACTED]
[REDACTED]

Head of Transport, Transport, Infrastructure and Connectivity

GREATERLONDONAUTHORITY

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

Mobile: [REDACTED]

london.gov.uk

[REDACTED]@london.gov.uk

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

Sent: 14 July 2021 18:23

To: [REDACTED]@londoncouncils.gov.uk>; [REDACTED]@london.gov.uk>; Mayor
<mayor@london.gov.uk>

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

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

Hi [REDACTED]

I can confirm that we've received this and will process it

[REDACTED]

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

Sent: 14 July 2021 12:28

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

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

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

Dear [REDACTED]

Please find attached Spencer Palmer's letter to Sadiq regarding Brent'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]

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[REDACTED]

From: [REDACTED]@brent.gov.uk>
Sent: 18 September 2021 08:30
To: [REDACTED]
Cc: [REDACTED]@londoncouncils.gov.uk; [REDACTED]@londoncouncils.gov.uk
Subject: Spencer's letter to Sadiq re: Brent's band change - GLA's Response
Attachments: PCN Banding Consultation Response Summary.pdf; Overall Consultation Summary on PCN Banding.pdf; LB Brent PCN banding Equalities Analysis Summary.pdf

Importance: High

Dear [REDACTED],

Further to your correspondence dated 7th September with [REDACTED] of London Councils, your request for additional information in support of the Parking Penalty Charge Notice Banding application from the London Borough of Brent has been forwarded to me for reply.

I can confirm that Brent Council has given careful consideration to the comments from respondents. We conducted an Equalities Analysis before agreeing to progress the proposal to you via London Councils. I can confirm that we are seeking approval to implement the proposed change to a borough-wide Band A level for parking Penalty Charge Notices throughout Brent. The attached three documents provide an in-depth analysis of the consultation responses. The reports entitled 'PCN Consultation Response Summary' and 'Overall Consultation Summary' provide a full breakdown of the responses, with a sample of comments respondents made in the free text comments box.

The report entitled 'LB Brent PCN Banding Equalities Analysis' provides a summary of respondents cross-referenced with the protected equalities groups. This summary supports our assessment that this proposal did not identify a disproportionate negative impact on any group with a protected characteristic.

I trust these reports provide you with the additional information that you need. Please do not hesitate to get back to us if there is any additional information that you need.

Yours sincerely

[REDACTED]
Strategic Director, Regeneration and Environment
cc. [REDACTED]@londoncouncils.gov.uk>
<[REDACTED]@londoncouncils.gov.uk>

Consultation: Distribution of Responses

The online consultation provided detailed background information and statistics on the proposal. The questionnaire intended to capture the responses of the consultees and as such, structured to ask three questions, one of which was the key question on the proposed change. A further three questions provided an opportunity for individual comments and opinions to be expressed as free text.

There were 1,368 respondents the consultation, summarised below:

Q1: *To what extent do you agree or disagree that further action form the Council is required to discourage illegal parking offences in the Band B area.*

| Option | Total | Percent |
|---------------------------|-------|---------|
| Strongly agree | 231 | 16.89% |
| Tend to agree | 147 | 10.75% |
| Neither agree or disagree | 76 | 5.56% |
| Tend to disagree | 137 | 10.01% |
| Strongly disagree | 766 | 55.99% |
| Don't know/Can't Say | 11 | 0.80% |
| Not Answered | 0 | 0.00% |

Q2: *Please let us know the reasons for your answer.* There were 1,131 responses to this part of the question. See paragraph 3.22 below.

Q3: *To what extent do you agree or disagree that increasing the amount of the Band B penalty Charge Notice to that Band A amount is an effective way of discouraging parking offences?*

| Option | Total | Percent |
|---------------------------|-------|---------|
| Strongly agree | 139 | 10.16% |
| Tend to agree | 132 | 9.65% |
| Neither agree or disagree | 76 | 5.56% |
| Tend to disagree | 129 | 9.43% |
| Strongly disagree | 879 | 64.25% |
| Don't know/Can't say | 13 | 0.95% |
| Not Answered | 0 | 0.00% |

Q4: *Please let us know the reasons for your answer.* There were 1045 responses to this part of the question. See paragraph 3.24 below.

Q5: *Key Question: To what extend do you support or oppose the proposal to change Brent's Band for parking offences from Band A / B to Band A?*

| Option | Total | Percent |
|----------------------------|-------|---------|
| Strongly support | 181 | 13.23% |
| Somewhat support | 94 | 6.87% |
| Neither support nor oppose | 62 | 4.53% |

| | | |
|------------------------|-----|--------|
| Somewhat oppose | 130 | 9.50% |
| Strongly oppose | 901 | 65.86% |
| Not Answered | 0 | 0.00% |

Q6: *In your opinion, what other measures can be useful in discouraging parking offences?* There were 1057 responses to this part of the question. See paragraph 3.26 below.

Consultation: Analysis of Responses

On the question of *‘To what extent do you agree or disagree that further action from the Council is required to discourage illegal parking offences in the Band B area’*

28% of respondents supported further action, with 66% opposed

Responses were analysed, with common themes emerging summarised below:

Respondents that were in agreement:

- Illegal parking is dangerous and a safety concern
- We should do more to deter illegal parking in residents’ parking spaces
- More deterrent is needed, with so many cars parking
- Illegal parking and bad parking prevents access to properties
- Illegal parking leaves disabled persons at a bigger disadvantage in finding a space
- Provides a fair approach for residents who pay for permits
- Will reduce the number of illegally parked vehicles.

Respondents that were opposed:

- It is just a means to raise additional revenue for the council
- Motorists are an easy target and punished as such
- Changes will make a difference to the way in which motorists park
- It will create an impact on local business
- The current penalty charges are fair and provide a good level of deterrent
- Provide more parking spaces to reduce illegal parking

A sample of actual responses is provided in the attached Appendix A.

On the question of *‘To what extent do you agree or disagree that increasing the amount of the Band B penalty Charge Notice to that Band A amount is an effective way of discouraging parking offences’;*

20% of respondents supported the proposal, with 74% opposed.

Responses were analysed, with common themes emerging summarised below:

Respondents that were in agreement:

- Increased fines could work as a deterrent

- Any additional measures are worth trying as the situation is getting worse
- Fines must be substantial and enforceable
- Single borough-wide charge is fairer
- There is a wrong belief that motorists are not doing anything wrong when parking illegally, so we need more deterrents
- Motorists will more likely comply and improve parking for everyone

Respondents that were opposed:

- Is a means for the council to raise revenue
- Small increase will not deter drivers parking illegally
- Motorists that park illegally know they risk a fine so a small increase will not discourage more of them
- Provide more parking spaces instead
- The current value of a PCN is enough of a deterrent

A sample of actual responses is provided, in the attached Appendix A.

On the key question of *'To what extent do you support or oppose the proposal to change Brent's Band for parking offences from Band A / B to Band A'?*

20% of respondents supported the proposal, with 75% opposed.

On the question of *'What other measures can be useful in discouraging parking offences?'*, responses were analysed, with common themes emerging summarised below:

Respondents thought the following measures could discourage illegal parking:

- Improved signage and line marking
- lower parking tariffs and permit prices
- More parking spaces
- Improved enforcement
- Focus more on serious offences and not on minor overstays in paid for parking
- Provide more information to motorists on parking restrictions

A sample of actual responses is provided in the attached Appendix A.

Analysis of consultation responses

As with other authorities, Brent often receives a low level of support for parking-related charge increases, with many comments expressing concerns that the proposals are motivated by a desire to raise revenue rather than manage parking and traffic flow. A sample of 275 responses of those opposed to the proposals was analysed. 88 of these responses (32%) expressed a specific concern about the measure being principally motivated by financial considerations.

However, there is no legal basis on which local authorities can consider any increase in parking-related fees or charges for the purpose of raising revenue. Further details are set out in the Legal Implications, Section 5 of this report below.

In any case, officer advice has been clear at each stage that these proposals are most likely to be revenue neutral. This advice is set out in the Financial Implications, Section 4 of this report below. The sole purpose of the proposals is to deter parking contraventions, leading to less PCNs being issued and a net zero impact on parking PCN revenue.

Notwithstanding the results of the consultation, officers remain of the view that the proposal to move the whole borough to Band A, will assist in the better management of parking space within the borough, help ensure that the highway network can operate effectively and also support independent travel by members of the public, particularly those with mobility impairments.

- The Band A penalty will have a greater deterrent effect than the Band B penalty
 - This is demonstrated by the recent growth in contraventions in Band B areas in comparison to Band A areas (see paragraph 3.11 above)
 - Neighbouring boroughs are moving to Band A which could leave Brent in an anomalous position and more vulnerable to illegal parking
 - The complex geographical boundary between Band A and Band B areas in Brent can no longer be justified, and is administratively complex and inefficient
-

APPENDIX A – Consultation Summary

This Appendix forms the attachment to the Delegated Authority Report: Penalty Charge Notices: Borough-Wide Banding.

1,368 responses were received to the non-statutory consultation that commenced 7th September 2020, ending 5th October 2020. A series of questions allowed for individual comments on the proposals.

This appendix takes a snapshot of random samples from the actual free text comments provided to questions 2, 4 and 6 without editing of amending the responses. Individual consultees' identities have not been disclosed.

Question 1:

To what extent do you agree or disagree that further action from the Council is required to discourage illegal parking offences in the Band B area.

| Option | Total | Percent |
|---------------------------|-------|---------|
| Strongly agree | 231 | 16.89% |
| Tend to agree | 147 | 10.75% |
| Neither agree or disagree | 76 | 5.56% |
| Tend to disagree | 137 | 10.01% |
| Strongly disagree | 766 | 55.99% |
| Don't know/Can't Say | 11 | 0.80% |
| Not Answered | 0 | 0.00% |

Question 2:

Please let us know the reasons for your answer. There were 1,131 responses to this part of the question.

The random sample of 75 responses focuses on responses where the consultee has indicated they disagree that further action is required to discourage illegal parking offences in the Band B area.

| |
|---|
| Absolutely no need to make more money off us. Especially in such a difficult time. |
| I do not consider it necessary to raise the parking fine. It is just an excuse for raising your revenue. Have more traffic wardens and issue PCN's. |
| Don't think it's fair people are constantly being punished for driving |
| I don't feel this will work as individuals will still abuse the system regardless of cost. |

| |
|--|
| Brent Council's fines are already much higher than other London boroughs such as neighbouring RBKC and Islington and do not need to be increased further, they are already an enough of a deterrent. In fact they should be decreased to fall in line with the boroughs mentioned, which are much fairer penalties, particularly in this time of economic hardship as a result of the Covid pandemic. |
| People do make mistakes or just over-run the time by a few minutes. This is not intentional and penalises those who are already short of money. Brent has become like one large car park with nearly every street having resident parking. This only happened because as each road near to transport had parking restrictions put in, the surrounding streets than got congested, thus it rolled outwards, until nearly everywhere has restrictions. I am not saying that everywhere should be free but if there are resident bays, then also allow paid parking in more of them. If it is impossible to find somewhere to park and pay, then it will lead to people taking a chance, not because they are not willing to pay but because you can't spend hours looking for a parking space. |
| Charges are high enough and enforcement is at the right level there is no justification for raising the penalty |
| The cost of the PCN seems high enough as it is today |
| Completely unnecessary, there should be less parking restrictions in Brent these days rather than more. Parking in the area is already severely limited and this will just make it more difficult, especially for low income families. More should be done to increase the amount of parking so that people do not have to park illegally. |
| I believe this is just another money making racket. You sneaked in removing the visitors parking tickets which cost a lot less than what we suddenly have to pay online. You are making out that this is going to be helpful to Brent residents when you are well aware it is already too expensive for visitors to park. You used to not issue on occasions like Easter and Christmas , but you again sneakily removed that. You are a pack of money making crooks. I pay full council tax and all I get is my bin emptied once a fortnight. Be honest and tell the residents the truth. Your councillors are a total waste of time. A pack of spongers on Brent residents. The only people you represent are yourselves |
| I think that further increases will be unfair to a borough that is already one of the poorest in London. There will be more appeals due to inability to paid the increase penalties. |
| It's very difficult for people to use local businesses already. The last thong we need is more detergents. |
| No one actually looks up what the penalty rate is when they're illegally parking, and it's not signposted anywhere. They'll continue to do it regardless of cost, so this proposal feels like nothing more than a cash grab. |
| because some people can't afford it |
| The current amount is not cheap and an extra £10 is not going to make a difference. Most people do not intend on breaking parking restrictions, more parking should be made available. This is just another money making scheme. It is not needed! |
| Although band A is a good solution, it doesn't help the amount of cars that come through Brent from other parts of London or the lack of resources brent can spare. |
| Because I feel this is just another way to make money off drivers |
| As you and everybody else know, the penalty system is not designed to help the traffic or the community, but it is just a shameful scheme to collect money from the car owners. Please stop insulting the intelligence of the people and get your hands off their pockets. |
| The penalties are high enough so I cannot see why it would be a deterrent |
| The band B areas are more peripheral and in my opinion in need of more highly visible signage to inform people rather than penalise them even more. |
| Won't be a guaranteed deterrent |
| Already quite strict action takes place without much involvement of common sense. Seems like a money-making exercise rather than solving actual illegal parking issues. |
| illegal parking is punished enough as it is, im not sure increasing peoples fine will make them do anything different, not do I see any benefit to the community. |
| The fine is already high and you have no way to discern between people disregarding the rules or honest mistakes made by residents trying to abide by the rules. |

| |
|--|
| I have not noticed any particular problem relating to illegal parking in our street, the local high street (Willesden Green) or indeed anywhere locally. I would rather the council focused on dealing with the illegal fly tipping, increasingly a problem. |
| I feel as though car owners are penalised enough and it is discouraging people visiting Brent and using the local shops therefore not bringing revenue into the borough. |
| It will not deter anyone as motorists are not even aware of the pcn bands. Do not try and use this as another excuse to take more money from motorists. |
| The charge is high enough and this will not drop the rates to which the public receive pcns, this is and what only seems form of tactic to generate even more money from the public. |
| Car drivers seemed to be being used as a cash cow |
| In the current economic climate any move to penalise people financially should be resisted. It's a financial exercise and being one of the poorest boroughs in London means you should not increase fines or charges |
| I don't think this will change the habits of the people. I believe the number of the cars must be reduced from the country. |
| I don't think it fair to charge such high sums for breach of parking regulations. The council should instead make sure there is adequate carparking in the area. The area has expanded so much in terms of housing and very few residents of new flats have anywhere to park. The data that there are more and more fines in Band B proves the inadequacy of car parking facilities in Brent. |
| Active And obvious parking officer presence already |
| Councils just need an excuse to make money off general public. In name of this and that. |
| Unreasonable on the grounds of being in a global pandemic where people are losing there jobs wages are down and with ULEZ coming in early next year this is not a way of helping Brent residents, as always motorists are being targeted instead of regulating cyclists who are being given more and more of the carriage way with parking spaces being taken away. |
| We are clobbered hard enough as it is, what with covid, people losing their jobs and yet more charges, terrible idea,i wonder how many civil servants lost wages due to covid? |
| Across London parking is becoming more and more difficult with more and more restrictions and rules being enforced, with the sole purpose of creating cash flow for the councils and TFL etc. There is no need for stronger enforcement, but a desperate need for reducing nonsensical restrictions. |
| Drivers should be actively penalised for serious infringements - those which cause potential danger to other drivers and pedestrians. If someone commits a "Band B" offence, that does not actively affect others, and should be recognised as such. Those offences which cause danger and potential accidents should be penalised at twice the amount of lesser offences, not at the same level. |
| 1 The council is Looking for more ways to increase its income as a result of austerity 2 I think that one of the reasons for an increase in the number of pcns issued in Band B areas may be because of an I crease in the number of wardens checking for these 3 incomes of Brent residents are decreasing as a result of Covid 19. 4 I suspect that there are more entrenched reasons for drivers parking inappropriately that are not addressed here - I would cite a similar argument for the supposed deterrent to fly tipping that Brent users saying "we will catch you " Which has little effect |
| I have No problems with parking contraventions and current scheme is working well |
| There is enough enforcement. This is not the right time to penalise people any more than you already do. |
| It's pricey enough with not many substantial parking facilities that are affordable as alternatives. |
| Higher fines don't deter, they just punish the public more and are a horrible way to strengthen the councils coffers. |

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| I believe it's fair to have a 2 Band option the council I believe make good revenues from both bands and this increase looks like the council is out to make yet more money. This move is not in my opinion about the well-being of the road users. WE DO NOT NEED MORE INCREASES . |
| I think it is very unfair, especially as many times I can't park on my own road meaning I can easily incur charges. Why would I want to up this? Unless you're providing additional parking? |
| I feel that your just trying to revenue raise and it has nothing to do with deterring people that are parking in my area, you guys because of COVID 19 haven't earned much money this year and now your trying to make up for it off the back of the public and residents of this area. I say no |
| Stop trying to raise money by penalising people more. The suggested changes will not make a tangible difference to anything other than income from parking contraventions. |
| You make enough money from us road users. Give us a break! |
| Because this is just another way for the council to make more money and I strongly disagree with having such strict rules. The nanny state is a terrible idea. |
| Brent council can find others means by which they can raise revenue. Parking fines SHOULD NOT be one of them |
| Anyone who's not deterred by a fine of £110, will not be further deterred by an additional £20 penalty. |
| Your reason for wanting to do this is no doubt more motivated by getting more money for council coffers out of the motorist than by improving the lot of Brent residents |
| I cannot say there's a lot of illegal parking because people are afraid of getting a ticket. Sometimes drivers overstay in error and mistakes can be made especially by older people (speaking from experience) |
| Because I think it's not fair to put people under more pressure. I am paying a very high parking permit what the council should do is lower the parking time from 8 till 6.30 Monday to Saturday. Why not Monday to Friday and starting from 9 until 6. That would help with people over staying. This is not to help us but to put more money in the council pocket. I think it is so unfair why don't you get rid of pcn. |
| Employing further financially punitive measures is not the answer. More careful thought needs to go in to it. I can park in an adjoining borough on Saturdays but Willesden Green is no parking Monday to Saturday. The parking restriction here on a Saturday is unnecessary. If Brent looked at easing restrictions in certain areas at certain times maybe people wouldn't be committing parking offences. The band B offences are the ones most drivers are likely to commit not because the fine is less but because the majority of drivers aren't inconsiderate enough to others to commit Band A offences. In a place of worship that I pass by on Fridays the parking contraventions are quite frankly appalling. Those actions will impact the statistics considerably and everyone carries the can instead of those who are committing the offences. I rarely see parking enforcement there. It's not as clear cut as it seems and Brent need to look at this deeper and not just seek to gain more revenue from increased fines like other councils who equally should be looking at ways to reduce vehicle road use and hence parking with positive pro active measures. An 8 bike parking space costs many times more than the cost of a single parking space if you add up the individual cost for that space. Funny way to encourage cyclists in an area where accommodation is cramped and there is little space for bike parking. Mines staying in the house - Cost = 0. |
| Furthe action from the council will not discourage illegal parking offences. You need to look at the root cause of the offences. I can tell you; Lack of FREE parking places Too many properties, resulting in to many people |
| Because you need the money coming from the fines to run the borough you should also try to use that money to fix the pot holes! |
| It is entirely obvious to me that the aim of this exercise is to raise extra revenue for the council. I find it condescending of the council to suggest otherwise. On those grounds I strongly object to changing the band from B to A. |
| The council uses parking tickets as a key source of income and therefore targets motorists who are not a nuisance. The state if Brent roads and parking facilities has decreased when pcn charges have increased so also shows the councils attitude of using motorists as only a source of income rather than a group to provide a service to. |

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| Expensive enough. Don't believe the increase will have an effect. Many people get tickets through unintentional parking errors. |
| For most people, fines relating to PCNs are already deterrent enough and have a significant financial impact. As a regular driver, I find it is already difficult enough to comply with the myriad of traffic and parking regulations. One moment of inattention or forgetfulness results in a financial penalty. Saying that, I think raising the fines for deliberately anti-social behaviour, such as parking in Bus bays or over pedestrian crossings, is a good idea. |
| I believe the presence of the parking enforcement is enough. Also Brent has always been an area with restricted parking due to Wembley so there are a lot of signs around explaining parking restrictions. |
| The increased number of PCNs is probably due to the use of a significantly improved method of detection i.e. camera cars replacing wardens on foot. |
| Penalty charge notice is just a scam for the council to make money. There is no benefit to local people. PCN should only be issued if someone is blocking a driveway or an access or traffic or parked dangerously. More bays should be made free to parking for limited time for people to do shopping. I can go on but it is not going to make any difference because the council employs people to find ways of making more money for the council. This money is then wasted on paving the pavements with expensive granite when nothing is wrong with the old concrete slabs. |
| As a resident of the Band B area for over 30 years I have never had an issue with illegal parking offences. |
| Looking at your 3-years of figures, there is already some volatility in the number of parking fines in bands A and B from one year to the next and I think you need to gather further years of data to be able to confidently state there is a trend. In addition, if 2020 includes any period influenced by the Covid 19 pandemic, the figures will be skewed and not representative of normal conditions. Importantly, you state in your Brent Parking report that PCNs have increased by 7% compared to the same period last year not because of more illegal parking, but because of better management of CEOs. This is taken from your last report: "This [7% increase in PCNs] has been facilitated by recruitment and retention of skilled staff, supported by payment of the London Living Wage, and better management of deployment to focus on areas of higher contraventions, introduction of night-time enforcement at key locations, particularly at weekends, supported by feedback and requests from local residents and businesses. " |
| I think the reason for such offences in band b is that parking spaces are more limited and enforcement is detected by man and not machine. This gives people a chance to get away with this type of parking if they're not seen by a CEO. They may also feel they need to take the risk as there is nowhere else to park near home, a friend's house or local shops. |
| Why do you need to increase fines, it not related to inflation, fine current level is ok , by increasing its just money making scam. |
| I very rarely see any illegally parked vehicles in my area. It is a residential area, so it is usually the visitors that receive parking penalties, as it is so difficult to buy visitors permits now as it has to be done online. Very difficult for older generation which have no internet access. |
| I feel the current actions being taken are sufficient. However, further specific action for people parking illegally in disabled bays does need to happen. |
| this is not going to deter illegal parking, get more civil enforcement engineers and to cut down on permit fraud, why are people not living in streets of Brent managed to obtain permits |
| You use this as a way to raise revenue. The introduction of better enforcement (using electronic methods) is most likely why the number of offences has risen. You are using an increase in offences to try to justify increasing the charges! In a time of great change in people's working patterns due to Covid (and after) you should be increasing parking availability in local shopping streets and surrounding roads to encourage local shopping and the survival of local shops - not increasing penalties. |
| Brent has fewer parking spaces now, because many high rise apartments have been built in the last decade, meaning a significant increase occupants in the area paying significantly more council tax revenues. Brent's answer to this is remove spaces and add double yellow lines and sell off car parks. Parking spaces and parking should be relaxed in front of small businesses and vendors, with revenues earned from parking meters rather than fines for a lack of spaces. |
| your fines and penalty notices are enough to make people aware not to do it again Its a shame they weren't aware in the first place |

The fines should be targeted at large trucks and delivery operators. Fines for normal cars which will largely be residents and families should not be increased. Many fines are issued for small infractions which are no threat to traffic or safety if road users or pedestrians. There has to be higher fines for more dangerous or disruptive incidents. A truck blocking buses on Kilburn High Road getting the same fine as a car parked an inch over a parking bay makes no sense. Commercial operators should face fines of 500 GBP up, to stop abuse. Residents fines should be lowered.

Question 3:

To what extent do you agree or disagree that increasing the amount of the Band B Penalty Charge Notice to the Band A amount is an effective way of discouraging parking offences?

| Option | Total | Percent |
|---------------------------|-------|---------|
| Strongly agree | 139 | 10.16% |
| Tend to agree | 132 | 9.65% |
| Neither agree or disagree | 76 | 5.56% |
| Tend to disagree | 129 | 9.43% |
| Strongly disagree | 879 | 64.25% |
| Don't know/Can't say | 13 | 0.95% |
| Not Answered | 0 | 0.00% |

Question 4:

Please let us know the reasons for your answer. There were 1,045 responses to this part of the question.

The random sample of 75 responses is based on those where the consultee has indicated they disagree that increasing the amount is an effective way of discouraging parking offences.

Hiking prices by a nominal amount won't stop intentional offenders which is the minority. But it will certainly penalise those who might make a mistake..and a fine of 130 is extortionate especially at a time the country will go through hardship.

money making scheme

The penalty is adequate already

Fines are adequate. People don't break the rules because they feel a penalty charge is lower in one area or another but the data is probably due to other factors as the traffic flow or parking availability in the different bands.

To raise PCNs based on this data is misinterpreting this data for financial gain, nothing to do with safety.

Nobody will care if there is a higher fee paid, it won't make a difference.

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| Again regardless of cost this will still be abused and the local residents in band B will suffer especially if parking is needed due to GP appointments. Sometimes you cannot predict how long you're likely to wait for some appointments despite given a time. |
| It will not discharge people . It's a money grabbing method by Brent again ! |
| Increasing penalty charges only benefits the council not |
| The level is high enough. You should be encouraging a more reasonable mix of public transport and private and commercial transport. Particularly in this environment (Covid) it would be immoral to raise taxes in this way |
| If people are going to park illegally the difference between £110 & £130 is really not going to make a difference |
| Not an effective way. Need more parking spaces and also more free parking places so people will not have to do illegal parking. |
| Don't think it will make a difference. Usual offenders will continue doing the same but council will make more money from neighbors who make an honest mistake. |
| This is not the time to be charging people more. And this will have the largest of residence who are parked by their homes. |
| There isn't enough parking spaces available. |
| It is not that much difference, and I don't think that people have the cost in their heads when they are making a decision about whether or not to park stupidly. |
| I have never received a PCN in a case where I thought that the low cost of it wouldn't matter and decided to break parking rules in advance of receiving it. I was not even aware of what the cost of the PCN would be in case of contravention in the cases when I received a PCN. |
| I don't believe it is more of a deterrent, I think the current rate is a deterrent enough and it is usually people making mistakes not wilfully disregarding the law. |
| If the council is generating income from PCN to fund other services then why reduce the income stream? |
| Cash grab |
| When people park in a Band A or a Band B zone illegally, they are generally unaware of the zone they are in. They simply need to park their car. People do not stop to calculate how much their fine will be because they have no intention of getting caught! This is, and will be seen as, a way of raising revenue |
| Just a further way to extort money from hard pressed motorists |
| Increasing the fine amount means Brent makes more money to hire more wardens to take money from genuine hardworking people. |
| Is the person who thought about this increase from Brent? Do they understand the local people? |
| Those parking illegally on purpose will continue to do so as they probably avoid paying the fines too. The higher charges will only impact law-abiding citizens who make a mistake or are issued a PCN due to circumstances beyond their control. |
| I believe the council do not care about Illegal parking and just want to increase their revenue streams so that they can justify bonuses paid to senior executives. |
| It is quite clear that we need more free parking area so that people can come to the shopS and businesses in the area as opposed to discouraging people from coming into the area and spending money very bad for business increasing the amount only makes this Worse |
| It's hard as it is at this point and having to charge more is not fair on everyone else. |
| The Band B financial penalty is already high enough. This proposal appears to be using the motorist to assist Brent Council with a funding shortage. |
| People don't illegal park due to the amount of fine imposed. As soon as most people receive a fine they understand that they have done something wrong and don't do it again. increasing the fine will make no difference |
| Band A charges are needed only in specific areas for specific reasons & I don't believe it should be rolled out in the whole borough |
| the fines are already a significant deterrent. I have not noticed the need for / higher fines. people do not generally ignore the fines, usually they misunderstand or are delayed etc ..bigger fines will just hit ordinary people who make a mistake , harder. HIGHER FINES ARE NOT NECESSARY! |

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| As above ie it's already expensive enough and is for parking not for more serious parking contraventions |
| People are still going to park as there are not enough parking spaces. People want to travel by cars as buses are so unreliable, my sons are always waiting around for the 182 bus to take them to school and it's always late. Never on time. First make parking spaces then you will see the difference. Why take the bus if a bus journey takes 45min and that same journey takes 7min by car. |
| Because people don't park thinking they will be fined. It's always an error. |
| already very expensive |
| This is a money making exercise and exploration on poor people in/out the borough |
| This offers no deterrent to parking illegally |
| We do not have problems with illegal parking and so it is unfair that we should have this increase. |
| It is a revenue stream. Suitable and affordable parking is what is required now. |
| Due to prevailing Economic situation, its wrong to fleece people. |
| This is an income generating scheme for the council and is not a deterrent. Please stop fooling the ordinary people of Brent by justifying these additional premiums. Being the sole breadwinner for a family of 6 I find it unconscionable how expensive it is to live in London and the cost of owning a car. Furthermore, I understand that parking permits have been a justifiable means to park cars in a given area. However, the fact that these premiums went up significantly based on the vehicle emissions were a further income generation and less of a deterrent to stop wealthy individuals who will buy these polluting cars nevertheless. I find it shocking that the council are further looking for ways to further penalise people with PCN charges by increasing the amount. Please do NOT increase the charges because if you are hit with them they are very expensive as it is. I am completely against them. |
| Again, a money making scheme. It is not to deter people from illegal parking. |
| Due to the current climate things should stay has it is currently. |
| I beleave people are already scared being given penalty charge. I dont believe increasing the charge would change the minds of those ho park illegal. |
| I think that the council will benefit from more money but this won't stop people from making mistakes. I've got quite a number of parking fines because of mistakes and it's gutting having to pay extreme prices. |
| Anyone who's not deterred by a fine of £110, will not be further deterred by an additional £20 penalty. |
| I think most of the times people get tickets because they run out of time or dont find somewhere to park, just provide more pay and display parking |
| There is no evidence to suggest that increasing the PCN amount will discourage illegal parking. Nobody parks with the intention of getting a ticket. Therefore why would raising the amount result in fewer PCN's issued? Brent council are simply doing this to generate further income. |
| A lot of offenders are mistakes by the residents of Brent who live and circulate these roads. Increasing the amount has no effect on someone who has committed an offence in error. |
| More parking attendants present |
| Use your time and money more effectively rather than on money making schemes. |
| People who ignore parking restrictions are likely to be wealthy enough not to care about the penalty and therefor the increase will probably not be a deterrent |
| its a ploy for Brent to increase its revenue |

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| I disagree that the amount charged will discourage parking offences |
| I don't think it will deter people. It will likely to impact the residents more. |
| You just want our money by doing nothing |
| Just money grabbing Brent Council. Absolutely useless and have no idea on how to run a council. Where will the money go? Will it line the pockets of the "fat cat" council members? I know it won't go to the residents of the Brent |
| These fines are already substantial. This seems like the easy solution for the council and one that will be very difficult for lower income families and others who sometimes just make an innocent mistake. Someone committed suicide as a result of the stress incurred by parking fine debt which they couldn't afford. Please challenge yourselves more to think aof better and more innovative solutions. |
| Parking fine is Parking fine. By increasing the charges you can not deter people from illegal parking. What actually is expected from council is to create spaces for paid parking and stop new multi story building construction or at least make it compulsory for new multistory building to ensure there is underground parking space for every single resident in that building to avoid congestion on the roads. |
| Parking tickets do not work. It's a mere means of revenue raising. If you really want to deal with the issue of illegal parking then you should start towing illegally parked vehicles consistently |
| To increase from £30 to £40 will not be as much of an issue when people commit this offences. It will not sway anyone to stop doing it |
| it is already expensive and therefore effective. why make motorists pay for the council's inefficiencies |
| Illegal parking is happening because people can't find enough parking. More houses have been built and flats so there's more people in the borough and infrastructure has stayed the same? That doesn't make sense. |
| A deterrent of £55 (within 14 days) is sufficient. Increasing the amount by £10 will not amplify that deterrent. There is no motorist sat thinking i will park here illegally because it's only £55, but if it was £65 I wouldn't park there. |
| Everyone knows if they park illegally there is a likelihood of getting a ticket! What discourages people just as much as the penalty is the likelihood of getting caught! So no need to raise the amount of the penalty: invest in a few more parking wardens or get them to patrol the penalty "hotspots" more frequently. That will discourage offences most effectively. |
| Most people wouldn't know the difference until they have to pay the fine. |
| Penalties have been ever increasing over the years and even Your own statistics show that increasing penalty charges have not reduced the number of pcns . A reduction over three years in BAND A of 743 is not significant... and roughly equates to just 4.76 tickets a week. |
| If there existed sufficient parking spots, this wouldn't be an issue. The fact that yellow lines are drawn in most places, time restrictions are lengthy and event day hassles, an increased PCN isn't the solution in my opinion. Having said that, I can see it having a positive impact on the environment as people will be less likely to drive |
| Those who park illegally will not know what band of fine may be imposed. |
| Motorists currently have NO IDEA of what the fines would be for illegally parking. The amount of the fine in Band B would be more of a deterrent if it was signposted on the same signs that explain the rules, and the current levels are more than a penalty. |
| What's more concerning is the blatant disregard the council have to the specific incidents that result in a PCN being issued. My wife recently was penalised for parking at the end of a pay and display bay that, according to a poorly visible notice at the other end of the bay (that could not be visible for drivers approaching the bay from the end she parked), was suspended. |
| In the past I've been heavily punished for disputing a PCN issued on my (1 week old car) after paying to park in a bay but hastily confirming the transaction without having remembered to update my car registration plate in the phone system. |

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| The bottom line is this is yet a another cynical ploy by a cash strapped council that has got absolutely nothing to do with deterrence and only driven by cash generation. |
| This is purely punitive. I cannot see how increasing the charge so minimally will have an impact. How much is this change going to cost the taxpayer? What happens with the additional funds you make? The additional funds do not go back to the local taxpayer. We have seen more and more punitive changes by local councils making our living lives much harder. You should be investing your time and energy into making brent a better place to live rather than a pathetic focus on how to make more money out of making our lives more restrictive. If a penalty policy is already in place and people ignore it, then what makes you think charging more is going to help (other than your money pot?). Perhaps you need to consider why people have to break punitive parking restrictions? All our high street parking has been removed, you are making it harder and harder for people to use cars. Its an out-of-touch ideology to think London can be car free, many people need their cara for work or to visit local shops. You should be doing more to support local businesses and residents. |
| The money generated from parking fine do not change the way people park. It just another income stream for the borough. |
| I think drivers should be given some breathing space and stop increasing the charges. Some people need a car and therefore there should be more parking spaces so people won't park illegally. |
| You create situations which gives drivers no alternative but to risk parking in certain places - so many roadworks, streets cordoned off - limited spaces provided for parking, then you set about imposing additional costs on the basis that people are not adhering to the current rules. For example, where should we park our cars if our children are at different schools and we have to pick all of them up around the same time? Dreadful! |
| Any fine is a deterrent and people make mistakes. London is already one of the highest rates for parking penalties in the world and it does not qualify with the wages. its not ok to be raising this amount at this time. |
| Council main target is make money instead of deterring the illegal parking. |

Question 5: (Key Question)

To what extend do you support or oppose the proposal to change Brent's Band for parking offences from Band A / B to Band A?

| Option | Total | Percent |
|-----------------------------------|-------|---------|
| Strongly support | 181 | 13.23% |
| Somewhat support | 94 | 6.87% |
| Neither support nor oppose | 62 | 4.53% |
| Somewhat oppose | 130 | 9.50% |
| Strongly oppose | 901 | 65.86% |
| Not Answered | 0 | 0.00% |

Question 6:

In your opinion, what other measures can be useful in discouraging parking offences? There were 1,057 responses to this part of the question.

The sample of 35 responses is based on those where the consultee has commented on what others measures can be useful in discouraging parking offences.

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| The provision of more authorised short stay parking places would help people comply with parking restrictions by being able to park in authorised spaces. |
| More traffic wardens on streets |
| You are charging an arm and a leg for a land is not even yours. First provide car parks or plots for parking and bays and then start charging not the other way around don't just charge charge charge and do nothing not even the roads or pavements. Enough with stealing |
| People are confused often by the signage. Resident's parking say from 10.00-15.00 and then they think the yellow lines between are free outside those hours. You should be able to buy a permit where you can park all over Brent not just in your zone. |
| Parking Enforcement officers should be doing a lot more than just issuing penalty notices. They should be reporting Blue badge parking abuse abandon vehicles etc. |
| The council cannot use this to make more money out of the motorist. If parking was cheaper, there would be more money coming in. |
| Brent council could do well to consider focusing on their delivery of service to the community rather than imposing themselves. I have heard so many complaints lately about people receiving unevidenced threatening letters from Brent for things that have bewildered them. The roads are in bad shape although I have seen some improvements in parts. I don't ever remember having such widespread negative opinions of the council. I wonder if you know why at this time it is like this? |
| Typical that the council is looking to increase revenue through citizens at a tough time where there are money shortages everywhere. In my opinion, this does nothing to deter but rather increase revenue streams for the council. This is another form of tax. People do not illegally park based on the banding of fine. Illegal parking will occur regardless. |
| You mention barnet as an example of PCN tariff adjustment. They are a highly motorist unfriendly borough with limited and expensive parking. They have devastated the local shops and simply don't care. |
| There's just too much traffic going through Brent to control it. |
| Install enforcement cameras in the busy areas. e.g. near shops. |
| Increase the spaces for pay and display or decrease operating hours. |
| Councils as usual want to make more money increasing PCN'S but not spending on more car parks |
| You need to work on clearer sign posting. Why not look at your PCN data, see where the hotspots are, and then advertise this locally. i.e. outside McDonalds on Cricklewood Broadway the wardens literally hide and wait for offences, as the sign posting is so confusing. |
| Council needs to patrol and prioritise areas of traffic congestion, offenders know they can get away with no action. The high streets have been over run by offenders and little action is taken. Wardens seem to be attacking mostly residential areas where congestion is not a severe problem. I drive past areas where tickets are issued everyday and no deterrent, clearly that area should be served with double yellows or double red lines. |
| Reduce charges to support local business. Remove the removal of parking bays at short notice which gives residents penalty notices for parking on their road if say they are on holiday for longer than 5 days |
| Stop building on car parks |
| Fully support this as Wembley continues to be redeveloped it is vital to keep all roads free of illegally parked vehicles. |

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| I think it just help the council to increase their income on the coast of the drivers. |
| This feels like further impositions onto the driving fraternity . Try to be creative rather than taking in this bully boy attitude. |
| It would be more advisable for the local authority to work on ways to increase road sizes and to look at ways on providing further parking spaces for residents, whether that be pay and display/permit holders etc. With the increase of the multi-story flats that are being built endlessly in the borough more thought should be given to finding better parking solutions rather than ways to make more money by increasing penalty charges. |
| Brent need to invest to substantially increase provision of parking places. Penalising residents is unfair. It is also unfair on visitors to our borough. |
| It feels like another tax and I don't think it will make big difference. |
| Proposing increases must be the last option available to the council. Where people have no other choice but to offend, fines will still happen and we will be revisiting this same subject if no changes are made to the area. |
| It would be better if Brent Council considered how it could allow motorists to park in more locations and at less cost. Thus would encourage people to park legally. |
| It would be good to encourage electrical vehicles by providing charging places and penalty charges for anyone parking in those spaces. |
| Create more safe loading and parking spaces- especially for pick up and drop off in Wembley outside the civic centre then you will have less offenders. Better loading and unloading spaces generally and a bit more street parking would be helpful, I am aware however that this could impact flow of traffic. |
| This is a way to disguise what would otherwise be greater increases in council tax. |
| This must not be used as a general permission to increase parking fees across the borough and to generate revenue, which is how most people view PCNs. In addition there should be training for enforcement officers to 'allow' minor infringement rather than stand by a car or van waiting for the permitted time to expire and then immediately issuing a PCN. This is not fair, suggests they are on a bonus system and does not allow for unexpected delays. I can remember a time when meters were set that allowed you 10-20 mins lee-way at a much lower cost than the final PCN amount. This was fair and everyone paid rather than contesting notices. Additionally you need to reconsider Saturday parking restrictions. There should not be any restriction in residential parking on a Saturday or Sunday unless the area is a shopping area. |
| Enforcement & consequences for those whom break the law & park illegally in CPZ zones, on double yellow lines, on street corners, on pavements, in bus lanes, in the middle of the road, on zebra crossings. I have seen it ALL where I live in what happens in my immediate road from spill over if church end doesn't bare thinking if because its ALL the above & more. But these people just seem to get away with this daily without a care in the world & there is no recourse. Extend CPZ Zones in HY & others from Mon to Fri 08:00 to 17:30 and change to Mon to Sat 08:00 to 18:30 & increase enforcement & charge bad & irresponsible parking in Brent. We need a change. This is the time. You will be surprised how much support you will get for this from the residents in church end area whom own a car & pay for CPZ zones but cannot park near there homes due to constant illegal & unchallenged parking. |
| This is just a money raising exercise by the Council and it's the car owners that are to pay. Fine bikes for jumping red lights, riding pavements, not wearing appropriate safety equipment. Fine Electric bikes breaking 20 mph speed limits. Fine house owners not cutting their front garden hedges that over hang the pavement. |
| this will only effect local drivers not the ones visiting wembley for events |
| Lower the price of all bands of PCN's. Why are we penalising the vulnerable and the hard working? Give several warnings before handing out PCN's, or have more officers on the street to aid with safer parking. The PCN system harms both local businesses and the residents who live there. |

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| More investment should be made in pay and display areas rather than parking fines. |
| It is highly insensitive to be raising fines during a global pandemic. |
| The council should address the real issue taht there is not enough parking for members of the community and should start to find ways to help the community in investing in projects that would solve the problem over a lack of parking. |
| Parking offences would not take place if there were adequate parking in place and so the council need to address the real issue at hand and not just resort to punishing the community unfairly with a spike in fines |

Responses to Equalities Monitoring Questions:

Please state your Ethnicity

There were 1287 responses to this part of the question.

| Option | Total | Percent |
|---|--------------|----------------|
| Asian or Asian British: Bangladeshi | 18 | 1.32% |
| Asian or Asian British: Chinese | 3 | 0.22% |
| Asian or Asian British: Indian | 117 | 8.55% |
| Asian or Asian British: Pakistani | 35 | 2.56% |
| Asian/Asian British/Other Asian Background | 23 | 1.68% |
| Black or Black British: African | 29 | 2.12% |
| Black or Black British: Caribbean | 87 | 6.36% |
| Black or Black British: Somali | 5 | 0.37% |
| Black/Black British/ Other Black Background | 10 | 0.73% |
| Mixed/Dual Heritage: White & Asian | 10 | 0.73% |
| Mixed/Dual Heritage: White & Black African | 8 | 0.58% |
| Mixed/Dual Heritage: White & Black Caribbean | 8 | 0.58% |
| Mixed/Dual Heritage: Any Other Mixed Background | 18 | 1.32% |
| Other Ethnic Groups: Afghan | 1 | 0.07% |
| Other Ethnic Groups: Arabic | 17 | 1.24% |
| Other Ethnic Groups: Turkish | 2 | 0.15% |

| | | |
|---|-----|--------|
| Other Ethnic Groups: Eastern European | 6 | 0.44% |
| Other Ethnic Groups / Any other Groups | 11 | 0.80% |
| White: British /English/ Welsh/ Scottish/ Northern Irish | 309 | 22.59% |
| White: Irish | 39 | 2.85% |
| White: Traveller of Irish Heritage | 3 | 0.22% |
| White: Gypsy/Roma | 1 | 0.07% |
| White: Other | 127 | 9.28% |
| Prefer not to say | 400 | 29.24% |
| Not Answered | 81 | 5.92% |

Do you consider yourself to have a disability?

There were 1320 responses to this part of the question.

| Option | Total | Percent |
|--------------------------|--------------|----------------|
| Yes | 99 | 7.24% |
| No | 981 | 71.71% |
| Prefer not to say | 240 | 17.54% |
| Not Answered | 48 | 3.51% |

What is your age?

There were 1322 responses to this part of the question.

| Option | Total | Percent |
|--------------------------|--------------|----------------|
| 0-15 | 1 | 0.07% |
| 16-24 | 15 | 1.10% |
| 25-34 | 155 | 11.33% |
| 35-44 | 270 | 19.74% |
| 45-54 | 280 | 20.47% |
| 55-64 | 207 | 15.13% |
| 65+ | 145 | 10.60% |
| Prefer not to say | 249 | 18.20% |

| | | |
|--------------|----|-------|
| Not Answered | 46 | 3.36% |
|--------------|----|-------|

Please indicate your sex:

There were 1318 responses to this part of the question.

| Option | Total | Percent |
|-------------------|-------|---------|
| Male | 602 | 44.01% |
| Female | 463 | 33.85% |
| Prefer not to say | 253 | 18.49% |
| Not Answered | 50 | 3.65% |

What is your religion/belief?

There were 1302 responses to this part of the question.

| Option | Total | Percent |
|---------------------|-------|---------|
| Agnostic | 50 | 3.65% |
| Buddhist | 11 | 0.80% |
| Christian | 315 | 23.03% |
| Hindu | 94 | 6.87% |
| Humanist | 12 | 0.88% |
| Jewish | 23 | 1.68% |
| Muslim | 101 | 7.38% |
| Sikh | 3 | 0.22% |
| No religious belief | 208 | 15.20% |
| Prefer not to say | 485 | 35.45% |
| Not Answered | 66 | 4.82% |

What is your sexual orientation

There were 1289 responses to this part of the question.

| Option | Total | Percent |
|-------------------------|-------|---------|
| Heterosexual / Straight | 739 | 54.02% |

| | | |
|---|-----|--------|
| Bisexual (an attraction to both men and women) | 11 | 0.80% |
| Gay man | 19 | 1.39% |
| Gay woman/Lesbian | 6 | 0.44% |
| Prefer not to say | 514 | 37.57% |
| Not Answered | 79 | 5.77% |

Penalty Charge Notice Banding

Equalities Analysis (Summary)

LB Brent is proposing to move all parking Penalty Charge Notices (PCNs) issued in the borough to the higher Band 'A' level. This paper provides an analysis, broken down in respect of specified equalities categories, of the responses to public consultation on this proposal.

The consultation commenced on 7th September and ended on 5th October 2020. The consultation provided an overview of the proposal, and asked questions to ascertain whether respondents supported or opposed the proposed change. Over 51,000 emails were sent to parking account holders, registered residents associations, business associations and places of worship, detailing the proposed changes. 1,368 questionnaire responses were received. Respondents were asked to complete an equalities questionnaire, including specific categories relating to **gender, age, disability and race**. This facilitated an analysis of whether different groups varied significantly in their support for the proposal.

In respect of **sexual orientation**, only 36 respondents identified as Gay, Lesbian and Bisexual. This sample was too small to offer a reliable statistical comparison with the 739 respondents identifying as Heterosexual.

The following summary is based on a breakdown of the responses to the core question:

'To what extent do you support or oppose the proposal to change Brent's Band for parking offences from Band A/B to Band A?'

Equalities Monitoring Questions:

The equalities questions provided respondents an option to select *prefer not to say*. The percentage calculations below are based on the total number of respondents to the core question and excludes respondents that chose not to answer the monitoring questions.

Please indicate your gender

| GENDER | Support Change | Oppose Change | No Opinion |
|---------------|-----------------------|----------------------|-------------------|
| Male | 134 (22%) | 437 (73%) | 31 (5%) |
| Female | 114 (25%) | 327 (71%) | 22 (4%) |

What is your age?

| AGE | Support Change | Oppose Change | No Opinion |
|--------------|-----------------------|----------------------|-------------------|
| 16-44 | 82 (19%) | 343 (78%) | 15 (3%) |
| 45+ | 166 (26%) | 430 (68%) | 35 (6%) |

Do you consider yourself to have a disability?

| DISABILITY | Support Change | Oppose Change | No Opinion |
|-------------------|-----------------------|----------------------|-------------------|
| Yes | 30 (30%) | 67 (68%) | 2 (2%) |
| No | 226 (23%) | 710 (72%) | 45 (5%) |

Please state your Ethnicity

| ETHNICITY | Support Change | Oppose Change | No Opinion |
|---------------------------------------|----------------|---------------|------------|
| Black, Asian, Minority Ethnic* | 81 (20%) | 307 (75%) | 20 (5%) |
| White Ethnicities | 146 (30%) | 308 (64%) | 25 (6%) |

**including mixed race*

Analysis

The Equalities analysis shows that:

- Female respondents were more likely to support the proposal than male respondents
- Older respondents were more likely to support the proposal than respondents under 45 years
- Disabled respondents were more likely to support the proposal than non-disabled respondents
- White respondents were more likely to support the proposal than respondents of Black, Asian or other minority ethnicity

Commentary

Respondents to the survey were provided an opportunity to provide comments on the proposals. These comments formed part of the consultation as a free text comment.

A sample of comments were taken from each of the groups with a protected characteristic. The majority of respondents supporting the proposal to move to borough-wide banding said that a stronger deterrent was needed as illegal parking is a major problem.

The majority of respondents that were opposed to the proposal were concerned that this might be a means by which the Council could generate additional revenue from PCNs rather than to improve parking compliance.

In response the Council has restated that the sole objective of the proposal is to increase the deterrent effect of PCNs and thereby reduce parking contraventions. It is expected that this proposal will be financially neutral. The additional income from higher Band PCNs is expected to be balanced by a targeted 20% reduction in the number of PCNs issued. This assessment is supported by the evidence submitted by the Council showing no growth in recent years in PCNs issued in the part of the borough already in Band A (Wembley), whereas PCN issuance has increased significantly in the Controlled Parking Zones in Band B.

Following this analysis, London Borough of Brent did not consider there to be negative impacts on any specific group with a protected characteristic.

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