

LONDON BOROUGH OF CAMDEN	WARDS: All
REPORT TITLE Parking Policy Review (SC/2023/37)	
REPORT OF Cabinet Member for a Sustainable Camden	
FOR SUBMISSION TO Cabinet	DATE 28 February 2024
<p>STRATEGIC CONTEXT</p> <p>We Make Camden is our joint vision for the borough, developed in partnership with our community. The proposals in this report align with the We Make Camden ambitions that Camden should be a green, clean, vibrant, accessible, and sustainable place with everyone empowered to contribute to tackling the climate emergency.</p> <p>The Way We Work is the Council's response to We Make Camden. These proposals will contribute to ensuring that Camden's communities support good health, wellbeing, and connection for everyone so that they can start well, live well, and age well.</p>	
<p>SUMMARY OF REPORT</p> <p>Camden has highly ambitious sustainable transport, environmental and public health goals. Road transport contributes 13% of Camden's greenhouse gas emissions, and almost a third of nitrogen dioxide emissions. The Borough has declared a Climate Emergency, with ambitions to become net zero by 2030, and to achieve stretching World Health Organisation air pollution limits by 2034. Our communities have told us, over several years, of the importance of these issues to them, and the desire for healthier, more sustainable, and safer forms of transport to connect them to jobs, services and opportunities.</p> <p>The Camden Transport Strategy (CTS) identifies multiple policies and measures at the Council's disposal to help address these issues. Motor vehicle parking fees and charges, as well as terms and conditions of parking, are a key factor in the decision to own/use a motor vehicle. This report proposes a range of changes to current Camden highways ("on-street") parking fees and charges and terms and conditions to ensure the way parking is facilitated contributes to meeting our sustainable transport, road safety, climate change, air quality and public health ambitions.</p> <p>Key proposals, which were subject to a public consultation – "Healthy Streets, Healthy Travel: Cleaner, Fairer Parking" - in October/November 2023, therefore include:</p> <ul style="list-style-type: none"> • Carbon-emissions based charging across all parking products; • A new "Air Quality Surcharge" across a range of parking products; • Merging two, currently separate Paid for Parking Tariff areas into one; • Reducing the "maximum" stay time in Paid for Parking bays; • Only allowing one vehicle on each resident/business parking permit; • Charging for "solo motorcycle parking" bays in the Borough (currently free) and introducing new motorcycle parking products; • Removing visitor parking permit scratch cards for the majority of customers (a digital system is in place) • No longer providing, for new applicants, dedicated parking bays for Doctors permits across the borough and Business permits south of Euston Road 	

Arising from the above changes there is an increase in the fees and charges for the majority of reviewed parking products. Details on the above key proposals, and others, are set out in Section 2 of the report and Appendices.

Following consideration of consultation feedback, the recommendations in this report incorporate several amendments to the consultation proposals including (i) recommendations to phase in the proposed charges for all parking products in this review over two years (rather than implement in one year only), (ii) to reduce charges for electric motorcycles on all parking products (iii) to retain scratch cards for Assisted Customers and improve systems to assist those who need help transitioning to digital visitor permits, (iv) to undertake a bespoke approach to existing doctors permit bay locations and (v) to introduce a two-year “sunset” clause for existing permit holders with more than one vehicle on each permit.

The proposed changes aim to deliver cleaner, fairer parking in Camden that help meet our ambitious transport and environmental goals, whilst responding to important aspects of consultation feedback. The report is coming to Cabinet because it impacts those living and working in the whole borough and the level of price increases proposed necessitates Cabinet approval.

Local Government Act 1972 – Access to Information

No documents that require listing were used in the preparation of this report.

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RECOMMENDATIONS

That Cabinet, having considered the policy context set out in Section 1 of the report and Appendix 7, the results of the consultation as summarised in Section 5 and Appendix 4, and the results of the Equalities Impact Assessment in Appendix 2, and having due regard to the obligations set out in Section 149 of the Equality Act 2020 and subject to compliance with statutory processes where required, agrees the following recommendations:

Recommendation 1

Amendments A1 to A7 as set out in Section 2 to the Council’s highway (“on-street”) parking fees/charges including:

- A1 - applying a revised carbon emissions-based charging structure to Resident, Doctor, Business and Car Club permits and a simplified emissions-based structure to Paid for Parking, Visitor Permits and Hourly Business Permits;
- A2 - replacing the former Diesel Surcharge with an Air Quality Surcharge covering older petrol and diesel vehicles and applying this across further parking products;
- A3 - changing the hourly Business Visitor permit to an hourly Business permit and extend this provision south of Euston Road;
- A4 - introducing charging for solo motorcycle parking bays, and revising the pricing structure for all other motorcycle parking products;

- A5 - merge Paid for Parking Tariff Area 1 with Tariff Area 2;
- A6 - set parking charges for car clubs at the same level as Business permits, and;
- A7 - arising from the above changes, an increase in the fees and charges for the majority of reviewed parking products.

Recommendation 2

Amendments B1 to B5 as set out in Section 2 to the Council's terms and conditions for highway ("on-street") parking fees including:

- B1 - allow only 1 vehicle to be registered to each Business and Resident permit;
- B2 - no longer providing dedicated parking bays for Doctors permits across the borough and Business permits south of Euston Road for new applicants;
- B3 - integrate Car Club and Doctor permits into Business permits;
- B4 - restricting all Paid for Parking bays to a maximum stay of 2 hours (or 1 hour where in controlled parking zones with 2 hours of operation) except for bays in the immediate vicinity of hospitals, and;
- B5 - stop issuing scratch-card type Visitor permits except for Assisted Customers.

Recommendation 3

Recommendations C1 and C2 as set out in Section 2 propose implementation details of the above policy including:

- C1 – implementation of increases in fees and charges over two years, and;
- C2 – implementation of the restriction of only a single vehicle per permit immediately for all new parking permit applicants and from April 2026 for existing permit holders.

Recommendation 4: To implement the proposals as set out in the timetable and next steps in Section 9.1, including delegating to the Director of Environment & Sustainability, in consultation with the Cabinet Member for a Sustainable Camden, to consider/decide on any objections to statutory consultation and implementation thereafter.

Signed:

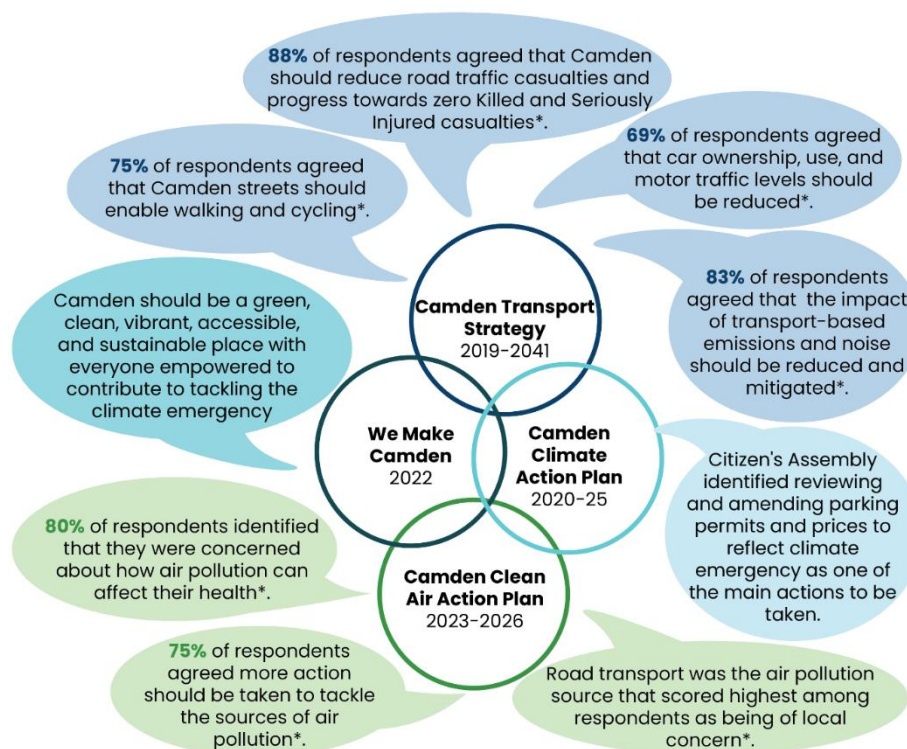


Richard Bradbury
Director of Environment and Sustainability

Date: 16/02/2024

1. CONTEXT AND BACKGROUND

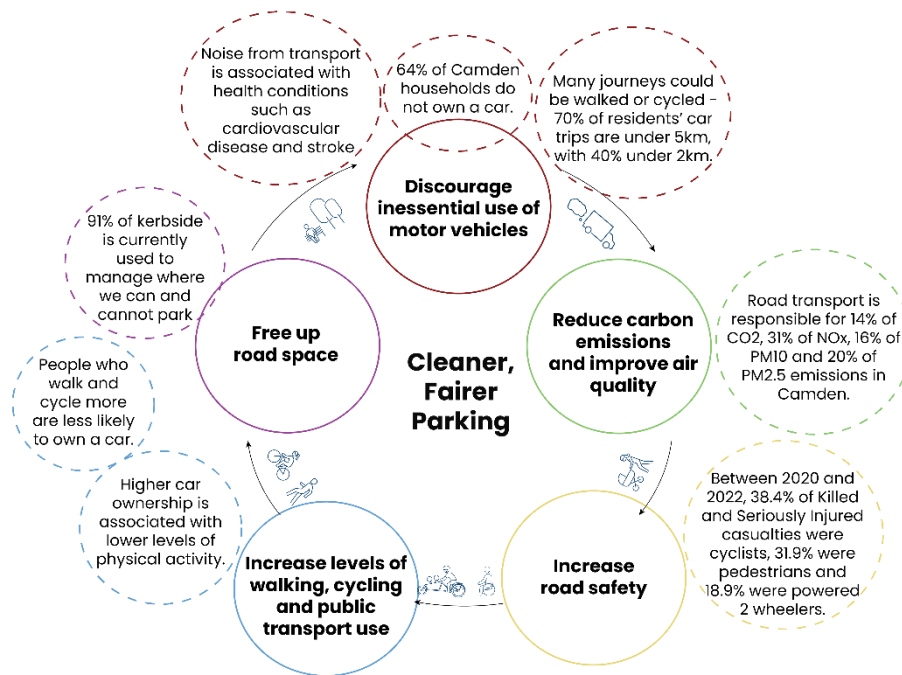
- 1.1 As a borough, Camden is highly ambitious in our over-arching sustainability, environmental and health goals. These have been developed through consultation and engagement with our communities over many years, including at the UK's first Citizens' Assembly on the climate emergency in 2019 which directly informed our 2020-2025 Climate Action Plan (CAP). We also listened to our citizens when developing the Camden Transport Strategy (CTS) which sets out our ambition for travel to become healthier and more sustainable, an ambition supported by our Clean Air Action Plan (CAAP). These goals are also evident in the missions and challenges of We Make Camden, our 2030 vision for the borough which was developed with key partners in the borough as well as our communities (see graphic, below).



- 1.2 A key part of this ambition is increasing the uptake of sustainable modes of travel and reducing private motor vehicle ownership/use in Camden in order to help mitigate against the Climate Emergency; to dramatically improve air quality in the Borough; and to improve public health and road safety. During the CTS consultation, a majority of consultation respondents agreed with a specific proposal that parking charges and structures should be reviewed regularly to reduce car ownership and use. The majority of consultation respondents also supported proposals to use parking policies to incentivise the uptake of lower-emission vehicles.
- 1.3 Action could not be more urgent. Camden is now experiencing the impacts of the climate crisis, with significant flooding events in 2021 and 2022 affecting over 100 homes and businesses in areas such as South Hampstead and South End Green. Summer temperatures in 2022 reached 40 degrees for the first time

with health implications for elderly residents and those with existing health conditions. Article 14 of the Council's Constitution places a duty on the Council to "enhance the natural environment, and to act to mitigate and adapt to climate change"; it is therefore incumbent on the Council to ensure that decisions address the climate crisis by cutting greenhouse gas emissions from fossil fuel combustion.

- 1.4 Road transport accounts for 13% of borough wide greenhouse gas emissions. Changes to parking policies that incentivise active travel and a shift to low emission vehicles are a significant way in which the Council can fulfil its climate related Constitutional duties in the context of transport emissions. For that reason, one of the "immediate" actions specified in the Climate Action Plan is to "regularly review and amend parking permits and prices to reflect the climate emergency".
- 1.5 Importantly, transport emissions also have a significantly negative impact on local air quality with serious implications for public health. Latest data shows that road transport contributes 31% of nitrogen dioxide in Camden and almost 20% of fine particle emissions known as PM2.5. 9% of all mortality in Camden results from exposure to PM2.5 and nitrogen dioxide, with 109 premature deaths across Camden associated with poor air quality every year. There is also a strong equalities dimension to the public health impacts of air quality with higher pollution levels more common in areas with lower income levels. Air pollution disproportionately affects the health of children, older people and people with existing health conditions. Childhood asthma prevalence in wards such as Somers Town and Regent's Park is significantly higher than the borough average, while the asthma prevalence across Camden is much higher among Black and Asian children than white children. Our most deprived communities tend to have the lowest levels of motor vehicle ownership yet suffer the most from impacts including poor air quality, road safety, and severance caused by traffic dominance. The graphic below, sets out our ambition for cleaner, fairer parking in Camden.



1.6 We have already set targets to help meet these goals, including:

- Achieving net zero carbon in Camden by 2030;
- Reducing road transport carbon emissions by 80% by 2041 (from 2013)
- Increasing the share of all Camden resident trips made by healthy, sustainable modes of travel (public transport, walking and cycling) from 85% (current) to 93% by 2041. This will necessitate a reduction in mode share by car/motorcycle from 13% (current) to 5%.
- Achieving Vision Zero (no Killed or Seriously Injured road traffic casualties) by 2041.
- Achieving the updated and more stringent World Health Organisation (WHO) air quality targets for particulate matter (PM) and nitrogen dioxide (NO₂) by 2034.
- Reducing road transport NO₂ emissions by 95% by 2041 (compared by 2013 baseline) and PM_{2.5} emissions by 67% (same dates)

1.7 Parking fees and charges, as well as terms and conditions, play a key role in the decision to own/use a motor vehicle, and are therefore a highly significant lever at the Council's disposal to help achieve the above aims and targets. It is important that charges are set at appropriate levels, and appropriate terms and conditions of parking are developed, to discourage inessential motor vehicle ownership/use, and - where there is an essential need - to encourage the switch to lower-polluting vehicles. As such, the Council commits to regularly reviewing parking charges and terms and conditions to deliver cleaner, fairer parking in the Borough.

1.8 The proposals in this paper also support wider regional strategies for London, including the Mayor's Transport Strategy (MTS). These and other relevant policies are explored in more detail in Appendix 7.

- 1.9 A review of parking products within this context identified the following issues:
- In Camden, road transport is responsible for 13% of CO2 emissions. Our current approach does not provide an incentive for customers to switch to lower carbon emission vehicles;
 - In Camden, road transport accounts for 20% of PM2.5 and 31% of nitrogen oxides (NOx) pollution, a significant contribution to air pollution and related negative health impacts. Despite this, not all diesel/petrol vehicles that contribute the most to these emissions currently attract a surcharge to discourage their use (see Appendix 4 Sections 5.16-5.17 for more details);
 - There is currently free parking for motorcycles available across the Borough, but the majority of motorcycles contribute to carbon and other emissions, noise pollution and are not an active mode of travel;
 - Some parking products have not been reviewed for several years and therefore current price levels do not sufficiently support achieving Camden's ambitious policy goals;
 - From 2018/19 to 2022/23, the number of Resident permits issued for very high emission vehicles has decreased by over 20%. However, the number of permits in the medium (121-150g/km) band of emissions increased by nearly 20%, suggesting more should be done to incentivise zero and ultra-low emission vehicles;
 - Latest data (2022/23) from Transport for London (TfL) shows that – whilst active travel usage is increasing – the percentage of trips by Camden residents by private motor vehicle (car/motorcycle) remains at 13%, which is unchanged from 2019 when the CTS was adopted;
 - The latest London Atmospheric Emissions Initiative (LAEI) information shows that, whilst carbon dioxide, nitrogen dioxide and Particulate Matter emissions from road transport have reduced in Camden, in 2019 (latest published data) the Borough was not meeting its Mayoral targets for each of those emissions types. Further measures are therefore needed in order to help ensure our stretching MTS target reductions are met moving forward
 - Residents and businesses are currently allowed to have up to 3 vehicles on each permit which does not discourage inessential car ownership/use and;
 - Existing maximum stays for Paid for Parking bays do not discourage inessential car use.
- 1.10 Section 2 below sets out proposals on recommended amendments to the charges and terms and conditions relating to the parking products to address the above issues. In formulating these proposals, the following was considered:
- Current relevant local and regional plans and objectives (above and detailed in Appendix 7) and data and information used to inform these policies;
 - Results of consultations and engagement undertaken as part of adopting relevant Council policies e.g. the CTS, CAP and CAAP (see Appendix 7);
 - The results of an Equality Impact Assessment (contained in Appendix 2);
 - The results of an additional impact assessment, used to identify those who may be impacted in relation to the cost-of-living crisis and to inform the development of cost-of-living support offers (contained in Appendix 5);

- Feedback from the public consultation undertaken in October/November 2023 on these specific proposals (summarised below and in detail in Appendix 4 and a list of the post-consultation changes can be found in Appendix 9) and;
- Benchmarking of similar/neighbouring boroughs (contained in Appendix 6).

1.11 In developing these proposals, we listened carefully to our communities throughout. The feedback from the public consultation as well as the results of the Equality Impact Assessment did result in changes to our initial proposals (see Appendix 9) as well as inform the development of, for example, the cost-of-living support offers. Our policy ambition remains high, but we want to ensure our citizens are supported in enacting the necessary change to meet our sustainability, environmental and health goals.

1.12 Alternative options were considered, detailed in Appendix 3, along with considerations of why they are not deemed appropriate in this review.

2. PROPOSALS AND REASONS

2.1 This section outlines the proposed amendments to parking fees and charges (Part A), terms and conditions (Part B) and implementation details (Part C). Some of these amendments and implementation details have been revised post-consultation in response to consultation feedback as set out in Appendix 4. A comprehensive list of the current and proposed fees and charges are set out in Appendix 1.

A. Proposed amendments to parking Fees and Charges

Amendment A1 - Applying a revised carbon emissions-based charging structure to Resident, Doctor, Business and Car Club permits and a simplified emissions-based structure to Paid for Parking, Visitor Permits and Hourly Business Permits

2.2 It is proposed to introduce a new low carbon emission band of 0-75g/km to encourage residents to shift from medium emission-based vehicles to lower emission-based vehicles where there is an essential need for motor vehicle use.

2.3 The proposal would apply the current lowest tariff charge as a baseline for the new low carbon emission band and proportionally increase the higher bands from this new baseline. A similar structure would be applied to Business Parking permits which are currently not emission based. As set out below in Amendments A6 and B3, Car Club Permits would integrate into Business Permits and be charged at the same level. Doctor surgeries will retain a 22% reduction on the cost of a permit.

2.4 Electric vehicle charges will be a 5% percentage reduction from the baselines described above.

- 2.5 We also propose introducing an emission-based charging structure to Paid for Parking charges, Hourly Business Permits and Resident Visitor permits with 3 tariff bands (electric, up to 120g/km and over 120g/km). Current pricing will be used as a baseline for the electric band with a 20% increase for the up to 120g/km tariff band and a 56% increase for the over 120g/km tariff band.
- 2.6 The proposed charges for each permit type and parking product can be found in Appendix 1.

Amendment A2 – Replacing the former Diesel Surcharge with an Air Quality Surcharge covering older petrol and diesel vehicles and applying this across further parking products

- 2.7 At present, a diesel surcharge is applied to Resident, Doctor and Business permits and Paid for Parking charges only.
- 2.8 It is proposed that a new air quality surcharge is applied to Resident, Visitor, Business, Doctor, and Car Club permits and Paid for Parking, replacing the diesel surcharge where it is currently applied. The air quality surcharge would only apply to older petrol and diesel vehicles. See Appendix 1 for details. The surcharge would be an additional 25% of the compliant permit price for petrol vehicles and 50% of the compliant permit price for diesel vehicles. The air quality surcharge is proposed to account for the fact that both older petrol and diesel vehicles contribute to air pollution (more details on how this would be applied in Appendix 4 Section 5.16-5.18).

Amendment A3 – Change the hourly Business Visitor permit to an hourly Business permit and extend this provision to south of Euston Road

- 2.9 It is proposed to convert the existing hourly Business Visitor permit (meant for use by those visiting businesses) to an hourly Business permit for use by businesses. This should facilitate parking for businesses with an essential, but occasional, need for a vehicle. The current allowance for Business Visitor permits would be retained, which is 120 hours in Controlled Parking Zones (CPZs) with 2 hours of controls and 500 hours for all other CPZs north of Euston Road. It is also proposed that these allowances are extended to south of Euston Road where the purchase of Business Visitor permits is not currently allowed.
- 2.10 The permit would be subject to the simplified carbon emission-based charging (set out in Amendment A1) for sessional products and an air quality surcharge as set out in Amendment A2.

Amendment A4 – Introduce charging for solo motorcycle bays and revise pricing structure for all other motorcycle parking products

- 2.11 At present, motorcyclists do not have to pay to park in the 337 solo motorcycle bays across the borough and pay a discounted fee (compared to cars) for Resident parking permits.
- 2.12 Given Camden's ambitious sustainable transport, public health and environmental goals, it is increasingly difficult to justify free and discounted

parking for motorcycles as the majority of motorcycles contribute to carbon and other emissions, noise pollution, and are not an active mode of travel. As such, an introduction of charges to park in solo motorcycle parking bays is proposed to discourage the inessential use and ownership of motorcycles. Where essential, amended charges are also proposed to encourage a shift to electric motorcycles.

2.13 Under the proposals, all motorcycle charging permits/charges would have two tariff bands, with separate charges for electric and non-electric motorcycles, as below:

- Non-Electric Motorcycle Band: proposed prices are set to the lowest carbon emission band for cars/vans for each product except solo motorcycle bay parking where there is a set daily charge (refer to Appendix 1). A flat rate is proposed for non-electric motorcycles because many motorcycle registration documents (V5C) do not contain their CO2 emissions against which carbon emission-based charges are applied. Motorcycles generally have lower carbon emissions than cars/vans, which is why the lowest charging band is proposed for motorcycles.
- Electric Motorcycle Band: It is proposed that the prices of electric motorcycles are set at 46% lower than that of electric cars as they generally have lower impacts on air quality. It is anticipated that this approach will encourage the use of electric motorcycles instead of electric cars where there is essential need for a motor vehicle.

Amendment A5 – Merge Paid for Parking Tariff Area 1 with Tariff Area 2

2.14 It is proposed that tariff area 1 (Kilburn - currently the cheapest tariff band area) is merged with tariff area 2 (currently to the east of Tariff Area 1, covering a large section of the north of the borough) to create a new tariff area 1. Figure 1 in Appendix 1 shows existing and proposed tariff areas.

2.15 This proposal is due to a study commissioned by Camden in 2019 (and updated in 2022) which concluded that (i) the existing Tariff Area 1 has traffic levels similar to other tariff areas in the north of the Borough (current Tariff 2 areas), and that (ii) a good number of trips could be switched to other more sustainable modes including public transport and walking in this area.

Amendment A6 - Set parking charges for car clubs at the same level as Business permits

2.16 Car club operators are currently issued permits for their vehicles at a lower price than other Business permits (23% less). This reduction was brought in when car clubs were first introduced to encourage uptake. There are also no current restrictions on the carbon emissions of vehicles used by car clubs.

2.17 It is proposed that Car Club permit charges are set at the same levels as Business permits. A further proposal is to only issue permits for car club vehicles emissions up to 150 g/km to encourage car club operators to deploy low emission vehicles in the borough. While it is recognised that car clubs play an important role in reducing private car ownership, it is difficult to justify

maintaining the current discount applied to them because they are no longer a business in infancy. Data shows that membership in London increased by 125% between 2019 and 2022 (from 296,367 to 667,440). Furthermore, benchmarking data shows that Camden's Car Club permit prices are considerably lower than other inner London Boroughs. Camden will continue to support and promote back-to-base car club use as an alternative to private vehicle ownership and where vehicle use is essential. Details of support for car club use can be found in Appendix 5.

Amendment A7 – Increasing fees and charges for the majority of reviewed parking products.

- 2.18 Arising from the above amendments, fees and charges are increased for all products in this review, including Resident Permits, Business (including Car Club and Doctor) Permits, Visitor Permits, short stay Business Permits and Paid for Parking. This price increase would affect motor vehicles of all emissions bands, except where the emission band is a base rate for subsequent emission bands and maintains current prices. The Air Quality Surcharge (proposed under Amendment A2) would also be set at higher levels than the existing Diesel Surcharge. In Appendix 1, Tables 1-7 set out in detail the proposed charges for each product compared to current levels, with the percentage increases.
- 2.19 The council has committed to reviewing parking fees and charges regularly as a means of delivering the objectives detailed above. In some instances, parking products like Resident and Business permits, have not been reviewed or significantly changed for some time. However, since the last significant price increase for Resident permits, the number of annual permits issued has decreased by 10%, suggesting that price levels can have an impact on car ownership and use (see Appendix 4 for more details). These fee increases are proposed to ensure they reflect the level of ambitions set out by the policies in Section 1 (and Appendix 7) and help meet these goals by encouraging the adoption of sustainable modes of transport where vehicle use is inessential.

A. Proposed amendments to parking Terms and Conditions

Amendment B1 - Allow only 1 vehicle to be registered on each Resident or Business permit

- 2.20 At present, residents and businesses have an allowance to register up to 3 vehicles to each permit although only one vehicle can be parked on street during hours of control. An additional charge is applied on Resident permits for the second and third vehicle.
- 2.21 This proposal is aimed at discouraging inessential car ownership. It should be noted that any eligible resident within a household can apply for a parking permit and therefore, for multiple occupancy households, residents can still apply for permits individually if the vehicle is registered to them. Businesses that require multiple vehicles for their viability can also have multiple permits.

Amendment B2 - No longer providing, for new applicants, dedicated parking bays for Doctors permits across the borough and Business permits south of Euston Road

- 2.22 Currently, Doctor permit holders across the borough and those Business permit holders based south of Euston Road are provided with dedicated parking bays. Installing these bays requires a statutory consultation for a period of 21 days and applicants are currently charged £3,341 to cover the statutory consultation and bay installation.
- 2.23 It is proposed that a dedicated parking space is no longer provided for new applicants of these permit bays. Instead, they would be issued a business parking permit that allows them to park in any permit holder/resident parking bay in the Controlled Parking Zone (CPZ) where the business or surgery is based.
- 2.24 This proposal should make it quicker for the Council to facilitate parking for doctors who visit patients in the community as well as businesses that require motor vehicles for their viability. It should also reduce the cost for these permit holders as they would no longer pay for the bay installation.
- 2.25 This would only apply to new applications for doctor dedicated permit bays. In response to concerns raised by some surgeries during the consultation, Doctors bays currently in place will be reviewed on a case by case basis. This proposal accommodates practices who need dedicated bays for essential operational reasons while rationalising existing provision if no longer required.

Amendment B3 - Integrate Car Club and Doctor permits into Business permits

- 2.26 It is proposed that the permits issued to Car Club and Doctor permit applicants be referred to as a 'Business' permit, with the proposed amendments A1-A3. This proposal is aimed at reducing the administrative costs relating to these products and to simplify the parking offer.

Amendment B4 - Restricting all Paid for Parking bays to a maximum stay of 2 hours (or 1 hour where current restricted hours are 2 hours) except for bays in the immediate vicinity of hospitals

- 2.27 At present 13% of Paid for Parking bays in the borough (mainly north of Euston Road) allow a vehicle to park for 3 or 4 hours.
- 2.28 It is proposed to restrict all Paid for Parking bays to a maximum stay of 2 hours (or 1 hour for CPZs where current parking hours of control are 2 hours).
- 2.29 This proposal intends to reduce the number of motor vehicle journeys by discouraging inessential car journeys and/or encouraging active modes of transportation. Reducing the maximum time of stay may also incentivise compliant parking – for details see Appendix 4.
- 2.30 In response to consultation feedback, we propose maintaining any existing 4-hour maximum stay parking bays that fall within a 100m radius of hospitals to support patients and visitors visiting the hospital.

Amendment B5 - Stop issuing scratch-card type Visitor permits except for Assisted Customers

- 2.31 Scratch-card Visitor permits are a paper permit currently available for a small number of residents who historically received them. They have not been available to new customers since 2021 where currently approximately 6% of all accounts use scratch cards. The vast majority of visitor permits are paid via the online system.
- 2.32 This proposal would remove scratch-cards for the majority of customers and implement e-permits for all visitor parking to facilitate the application of emission-based charging to Visitor permits. Those who are disabled or over 75 would still be eligible for 50% discounted Visitor permits and it is proposed that the allowance on Visitor permits currently offered for CPZs north of Euston Road will be extended to CPZs south of Euston Road.
- 2.33 In response to consultation feedback expressing concerns about those who are unable to access the online visitor permit system, it is proposed that scratch cards are retained for Assisted Customers, or those customers who are registered by Contact Camden as digitally excluded. As scratch cards are bulk purchased in advance without knowledge of the vehicle being used, we cannot apply the same emissions-based charging structure that is applied to other parking products in this report. Therefore, scratch cards retained for Assisted Customers will be charged at a base rate as shown in Appendix 1. Any resident can still call Contact Camden to pre-book / book visitor parking. For those who need out of hours access to telephone booking, we propose to introduce an Integrated Voice Recognition (IVR) telephone service. The IVR system guides callers through purchasing a permit with a pre-recorded audio, to which callers respond using their phone keypad or voice. To use IVR, the resident will need a parking permit account with a valid telephone number. On calling Contact Camden, they will have the option to use the IVR. The resident will be prompted to add the visitor's vehicle registration, duration required and payment. The overall average call time to make a transaction is 61 seconds. Further information is available in Appendix 2.
- 2.34 Note that any scratch card visitor permits currently in possession by Camden residents will still be valid following the adoption of this proposal.

B. Proposed Implementation

C1: Implementation of the fees and charges over two years

- 2.35 Under the proposed Amendment A7, prices would increase for many vehicle owners. This was noted in consultation responses, and as a result these fees and charges would be phased in over 2 years instead of 1 year, as initially set proposed in the consultation (refer to Appendix 1 for details of the increases over 2 years). This helps to support those impacted by the cost-of-living crisis and allows more time for residents and businesses to change to lower emission vehicles or shift their travel choices to alternative modes of travel. A detailed cost-of-living support package is also described in Appendix 5.

C2: Implementation of number of vehicles per permit will be limited to new permit applications.

2.36 The proposal to restrict the number of vehicles on a permit will be implemented for new resident and business permit applications. For those who currently have multiple vehicles on a permit, this proposal would take effect in two years from their permit renewal date to allow time to make the change.

3. OPTIONS APPRAISAL

3.1 Option 1: Implement all recommendations – This is the recommended option. The details and reasons are set out in Section 2 above.

3.2 Option 2: Implement an alternative set of changes - An alternative set of changes is explored in detail in Appendix 3. Alternative changes include different options around price differentials between tariff bands and implementing charges in one financial year as opposed to two. The reasons as to why each alternative change is not recommended are set out in Appendix 3.

3.3 Option 3: Do nothing - No changes would be implemented, and current fees and charges and terms and conditions are maintained. Although permits would still be subject to an inflationary increase. This is not recommended as it would not discourage inessential car use or the transition to lower-emission vehicles, thereby not contributing to meeting the relevant transport, climate change, health and air quality policy objectives.

4. WHAT ARE THE KEY IMPACTS / RISKS? HOW WILL THEY BE ADDRESSED?

4.1 There is a risk that proposed charges impact vehicle owners in Camden from more deprived socioeconomic groups who are less able to afford increased charges or switch to vehicles in lower emission bands. This risk has been explored in detail in Appendix 8, along with potential mitigations (including assessments of car ownership levels by income groups in the Borough, alternative transport and travel options, phasing in of charges, and so on).

4.2 There is also a risk that the proposed charges and changes are insufficient in meeting Camden's ambitious sustainable transport, health, road safety, climate and air quality objectives. However, this is mitigated by the Council's approach of regularly reviewing the parking fees and charges (at least every 2 years) to ensure they continue to meet policy objectives as set out in the CTS and CAAP. Furthermore, if the proposals are implemented, their impact will be monitored to assess their effectiveness in meeting the stated objectives, which will also be used to inform future reviews. More details on monitoring can be found in Appendix 4 Section 5.18.

4.3 There is a risk that proposed Paid for Parking changes and/or the removal of Business Visitor permits will reduce sales for businesses. However, customers

can continue to use Camden's extensive public transport (and shared transport) networks to travel to shops and may be eligible for some of the support offers in Appendix 5 to help transition to alternative modes of travel. Moreover, studies suggest that parking may not be as crucial to shopper visits as it is often perceived to be (more details in Section 9 of Appendix 4). [Data from Transport for London \(TfL\)](#) highlights that over 90% of trips for shopping purposes in Camden were made by walking, cycling or public transport in 2019/20.

- 4.4 There is a risk that some stakeholders continue to object on the grounds that increased prices for Resident and Visitor permits isolate some people if they cannot visit others or if prices discourage visitors. In lieu of motor vehicles, visitors can use multiple alternative modes of transport to travel to and throughout Camden, including public transport and walking/cycling networks – around 85% of Camden residents trips are already made by non-car modes. Furthermore, disabled and elderly people are still eligible for discounted Visitor permits, with an increased allocation for residents south of Euston Road. Disabled and elderly people can access a wide range of transport support, including PlusBus Door-to-Door, Scootability, Taxicard, Freedom Pass, independent travel training and more. The full range of potential positive and negative impacts of the proposals on protected characteristic groups, and mitigations, are set out in detail in the Equality Impact Assessment in Appendix 2.

5. **CONSULTATION / ENGAGEMENT**

- 5.1 As already detailed, the proposals in this report align with the feedback we have heard over many years from our residents through consultation, engagement and citizens assemblies. We also ran a public consultation seeking feedback on these specific proposed changes from 4 October to 5 November 2023.
- 5.2 The public could respond to the consultation with comments on an [online survey](#), via email or post. Consultation activities included two 1-hour webinars on 11/10/23 and 30/10/23, 400 postcards with information on the proposals were distributed near King's Cross and Camden Town underground stations and Hampstead Heath overground station, and posters distributed across the borough and at solo-motorcycle bays. In addition, 57,602 emails were sent to all permit holders and visitor permit users, social media posts were made on 5 different days throughout the consultation period and the proposals and survey were advertised on the Camden website and in the Just Park parking app.
- 5.3 In total, 2,885 responses were received during the consultation. Of these, 83% of respondents indicated they owned or had access to a car/van, whereas car/van ownership across all Camden households is only 36%. 84% of respondents were Camden residents, 11% visitors and 2% businesses. The most responses received were regarding Resident permits, followed by Visitor permits and reducing the maximum stay on Paid for Parking. For more details

on the demographics of those who responded and their responses, see the Consultation Report in Appendix 4.

- 5.4 Across all permit and product types, 71% of the responses received were negative comments about the proposals while 29% were positive or neutral.
- 5.5 The main negative themes from the consultation responses were:
- For Resident permits, respondents felt terms and conditions were too restrictive for vehicle owners.
 - For Business permits, respondents felt that small and medium-sized businesses would be negatively impacted.
 - For Visitor permits, respondents expressed concerns that the removal of physical scratch cards would impact people who are uncomfortable using digital Visitor permits.
 - For Motorcycle permits, respondents were opposed to charging for solo motorcycle bays which previously did not have a charge and felt that other parking price increases should not exceed inflationary rates.
- 5.6 The top positive themes were:
- For Resident, Visitor, and Car Club permits and Paid for Parking, the proposals would have a positive impact on the environment.
 - For Business permits and merging Paid for Parking tariff areas, the proposals were deemed to be reasonable.
 - For Doctor permits, respondents felt there was no need for doctors to have private parking spaces.
 - For Motorcycle permits, respondents welcomed increased policing of motorcycles, mentioning that motorcycles are too noisy, do not abide by traffic and highway regulations and park inappropriately.
- 5.7 After a review of the sentiments expressed in the consultation, several mitigations were incorporated into the proposals to respond to the concerns raised (see sections above and Appendix 9 for the post-consultation changes to the proposals). The full consultation report with more details on respondent demographics, additional themes for each parking product and officer responses is available in Appendix 4.

6. LEGAL IMPLICATIONS

- 6.1 The recommendations in this report are being considered in the Council's capacity as the Local Highway/Traffic Authority for the Borough.
- 6.2 The legal implications relating to parking fees and charges and terms and conditions are set out in the report.
- 6.3 Cabinet must, when carrying out the Council's functions (which includes making decisions), have due regard to section 149 of the Equality Act 2010 (the Public Sector Equality Duty - PSED). This duty includes having due regard to the need

to advance equality of opportunity between persons who share a relevant protected characteristic (including people with a disability) and persons who do not share it. The Council must comply with the duty, which requires rigorous consideration and an open mind, and is personal to decision makers.

- 6.4 In summary, the PSED requires the Council, when exercising its 5 functions, to have 'due regard' to the need to:
- Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act (which includes conduct prohibited under section 29);
 - Advance equality of opportunity between people who share a relevant protected characteristic and those who don't share it
 - Foster good relations between people who share a relevant protected characteristic and those who do not (which involves having due regard, in particular, to the need to tackle prejudice and promote understanding).
- 6.5 The relevant protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, race, religion, sex, and sexual orientation. In respect of the first aim only (i.e., reducing discrimination, etc) the protected characteristic of marriage and civil partnership is also relevant.
- 6.6 In addition, with reference to disability, the Council has a duty under section 29 of the Equality Act 2010 not to do anything that constitutes discrimination (or victimisation or harassment) in the exercise of a public function, and a duty to make reasonable adjustments.
- 6.7 The Council should also bear in mind relevant parts of the United Nations Convention on the Rights of Persons with Disabilities and the United Nations Convention on the Rights of the Child. Some of those parts relate to (as regards persons with disabilities) the physical environment, transportation, personal mobility and sporting and leisure activities (UNCRPD), and (as regards children) self-reliance and active participation in the community of disabled children, standards of health, dangers and risks of environmental pollution, and recreational and leisure activities (UNCRC).
- 6.8 Further, section 149 provides that the steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities. Compliance with the PSED may involve treating some persons more favourably than others, but that is not to be taken as permitting conduct that would otherwise be prohibited under the Act (which includes breach of an equality clause or rule, or of a non-discrimination rule).
- 6.9 The Council should be aware that the PSED is not a duty to achieve the objectives or take the steps set out in section 149. Rather, the PSED requires the authority to take the specified needs into proper consideration when carrying out its public functions. There must be a proper appreciation of the

potential impact of the decision on the equality objectives set out in section 149 and of the desirability of promoting them. “Due regard” means the regard that is appropriate in all the particular circumstances in which the authority is carrying out its functions. Provided due regard is had in this way, including considering mitigation measures as described below, it is for the Council to decide, taking into account all relevant factors (which may, depending on the circumstances, include the requirement upon the Council to operate within its budget) how much weight to give to the equality implications of the decision.

- 6.10 In exercising its road traffic and highway powers, the Council is exercising a “public function”: Under section 29 of the Equality Act 2010, it must not, when exercising a public function, “do anything that constitutes discrimination, harassment or victimisation” (section 29(6)) and it must make reasonable adjustments (section 29(7)). The duty to make reasonable adjustments arises in relation to disabled persons and under section 20 of, and Schedule 2 to, the Equality Act 2010.

7. RESOURCE IMPLICATIONS

- 7.1 The ambition of *We Make Camden* is that Camden should be a green, clean, vibrant, accessible, and sustainable place with everyone empowered to contribute to tackling the climate emergency. To this end, the Council has invested on average £37.6m annually over the past five years in highway and traffic improvements & maintenance, concessionary fares and home to school transport. This investment is funded from the Council’s own resources and any surplus revenue from the Council’s Parking Account in line with s55 of the Road Traffic Regulation Act 1984.
- 7.2 The report proposes a range of changes to current Camden highways (“on-street”) parking fees and charges and terms and conditions to ensure the way parking is facilitated contributes to meeting local and regional objectives on sustainable transport, climate change, air quality and public health. The proposed changes aim to deliver cleaner, fairer parking in Camden.
- 7.3 If the recommended Option 1 is pursued and all proposals are approved for implementation, it is anticipated that the changes would have an impact on parking revenue. In 2022/23, £19m was generated through paid for parking and resident, business & visitor permits. The potential impact of the policy changes on this income has been modelled. Firstly, the proposed charges have been applied to 2022/23 paid for parking and permit transactions. Camden’s past experience has shown that policy changes do achieve their objective to change behaviour and therefore result in a reduced number of transactions. The exact scale of the behaviour change is unknown so secondly three plausible scenarios have been modelled – a 10% reduction in transactions, a 15% reduction and a 20% reduction. Table 1 shows what the impact of these three scenarios would be if the proposed policy changes were in place in 2022/23.

Table 1

2022-23	Low Impact scenario	Medium Impact scenario	High Impact scenario
Actual income from paid for parking and resident, business & visitor permits	10% fewer transactions	15% fewer Transactions	20% fewer transactions
£19m	£23m	£22m	£21m

- 7.4 Table 1 shows a potential increase in income in all three scenarios in the short term. However it is anticipated over the longer term that transactions will continue to fall as behaviour changes and therefore the potential increase in income will only be temporary.
- 7.5 As with existing income from these sources, any additional income raised is ringfenced to the Council's parking account and can only be used to fund eligible expenditure in line with the Road Traffic Regulation Act 1984 Section 55. In 2022/23, the £30.3m surplus was reinvested in transport –details can be found in the [2022/23 Camden Annual Parking Report](#).
- 7.6 The scenarios do not factor in a wide range of other external factors influencing the income from paid for parking and permits. The overall changes to income are uncertain so the Council does not intend to make any budgetary decisions based on the scenarios.
- 7.7 The Council's Parking Operations service are exploring systems to deliver the new solutions and charges which might incur further costs. Early indications from soft initial market testing indicate the cost of these solutions can be met within existing expenditure budgets. Any resulting decisions will be made in accordance with the Council's Financial Standing Orders.

8. ENVIRONMENTAL IMPLICATIONS

8.1 In Camden, transport accounts for 13% of direct carbon emissions and is responsible for 31% of NOx, 16% of PM10 and 20% of PM2.5 emissions. These proposals aim to discourage inessential motor vehicle use and where essential, encourage a transition to lower-emission vehicles. If successful, it is anticipated that the proposals will have a positive environmental impact. More specifically, they would help contribute to achieving a zero carbon Camden and promote healthier travel options, which are goals outlined in the Camden Climate Action Plan. Furthermore, they would work towards meeting the WHO limits for NO2 and particulate matter by reducing pollution from transport, goals set out in the Camden Clean Air Action Plan.

9. TIMETABLE FOR IMPLEMENTATION / NEXT STEPS

- 9.1 The table below sets out the estimated timetable for implementation of these recommendations, if approved by Cabinet and subject to Call-In procedures.

Estimated date	Key Action / Milestone
28 February 2024	Decision due to be taken by Cabinet
March 2024	If Cabinet approves the recommendations the new fees, charging structures and terms are subject to a Traffic Management Order statutory consultation called a Notice of Proposal. The Notice will be advertised and contain instructions for making objections.
May 2024	Due to the London Mayoral elections and pre-election guidance it has been agreed to postpone the Notice of Proposal advert after the elections held on 02/05/2024. If objections are received against the Notice of Proposal, an objection report will be produced including any recommendations and will be passed for final consideration/decision to the Director of Environment and Sustainability, in consultation with the Cabinet Member for a Sustainable Camden, in order to determine whether the proposals should be implemented.
June / July 2024	Notice of making issued subject to objections report
June / July 2024	Implementation of Traffic Management Order
June / July 2024 onwards	The new charges, if approved, will be implemented over a two-year period as detailed in Appendix 1 – Tables of Proposed Charges.
June – September 2024	Solo motorcycle bay charging, if approved, will be rolled out across the borough between June and September. The Council will incrementally install new parking signage to all 337 solo motorcycle parking bays across the borough between June and September 2024.

10. APPENDICES

- Appendix 1 – Tables of Proposed Charges
- Appendix 2 – Equalities Impact Assessment
- Appendix 3 – Alternatives Considered
- Appendix 4 – Consultation Report
- Appendix 5 – Cost-of-Living Support Package
- Appendix 6 – Benchmarking of Other Boroughs
- Appendix 7 – Strategic Policy
- Appendix 8 – Additional Impacts Assessment
- Appendix 9 – Post-Consultation Changes to the Proposed Amendments