

## Appendix 4 – Parking Policy Review (Healthy Streets, Healthy Travel: Cleaner Fairer Parking) Consultation Report

### 1.0 INTRODUCTION

1.1 This document summarises the comments that were received in response to the Healthy Streets, Healthy Travel: Cleaner, Fairer Parking Consultation, which was carried out to seek stakeholder views, including those of Camden residents, businesses and visitors on proposed changes to parking charges and terms and conditions. The set of proposals are aimed at encouraging motorists to switch to more sustainable modes of transport or where private vehicle use is essential, to lower-emitting vehicles. These objectives are aligned with transport, public health, air quality and climate change policy goals. The results of the consultation have been used, alongside relevant policies and data/information, to inform the proposals contained in the cabinet report.

### 2.0 CONSULTATION ENGAGEMENT ACTIVITIES

2.1 The consultation period ran from the 4<sup>th</sup> of October until the 5<sup>th</sup> of November 2023. During this period, individuals and organisations could submit responses to a survey online or by post or send their comments by email. The following consultation activities and events were also undertaken as part of the consultation and to communicate the proposed changes as well as the open consultation:

- 57,602 emails sent to all parking permit holders and visitor permit users in Camden on 4 October 2023 with dedicated emails also sent to Doctors Permit holders, Garage Permit holders, Business Permit holders, Car Clubs and various stakeholder groups.
- [Dedicated consultation website](#) at We Are Camden portal which included details of the proposals and supporting materials such as Frequently Asked Questions document, information on how to provide feedback and the next steps for the proposals.
- Two 1-hour webinars on 11 October and 30 October 2023, both sessions included a presentation of the proposals and a Q&A session with Camden Officers. 40 people attended the webinar on 11 October 2023 and 17 people attended the webinar on 30 October 2023.
- A Camden Place Board meeting on 1 November 2023, attended by members of Camden Town Unlimited & Euston Business Improvement District (BID), Central Alliance District, Hatton Garden BID, Shaftesbury Capital, LabTech, and Federation of Small Businesses. At this meeting, proposals for Business Permits were explained and attendees were encouraged to take part in the consultation.
- 400 postcards distributed in high footfall areas near King's Cross Underground Station, Hampstead Heath Overground Station and Camden Town Underground Station.
- Trifolds (large posters wrapped around the base of lamp columns) distributed in 36 locations across the borough.

- Posters distributed in 45 locations across the borough and at solo-motorcycles bays.
  - Advertising the proposals and consultation survey in the Parking Permit Management System and in the Just Park parking app.
  - Social media posts on 4 October, 12 October, 20 October, 26 October and 1 November
  - Meeting with motorcycle interest groups Save London Motorcycling and Motorcycle Action Group. The council has regular meetings with these groups, one of which was held during the consultation period where the proposals were discussed.
- 2.2 In total, 2,885 individual responses were received. This includes 2,857 online survey responses, 5 paper survey responses and 23 email responses. This represents a 5% response rate from the 57,602 emails sent out to permit holders and users. Of the total responses, 2,402 indicated they were Camden residents, which represents 1.1% of the Camden population<sup>1</sup>. It should be noted that car/van owners were disproportionately overrepresented in the respondents when considering overall car/van ownership levels in the Borough, with 83% owning or having access to a car/van (compared to circa 36% of Camden's households)<sup>2</sup>. Further details on the demographics of the respondents, including travel patterns, are provided in section 3.0.
- 2.3 The consultation survey consisted of the following parts:
- Part 1 - Travel behaviour: Respondents provided information on their relationship to Camden, travel patterns and vehicle ownership.
  - Part 2 - Feedback on proposals: Respondents commented on each of the proposed changes in an open question. The most common themes for each parking product are examined more closely in sections 5 – 12 of this report while a table with all the themes and officer responses can be found in Annex C. Section 16 details the feedback received during the two webinars.
  - Part 3 - Feedback on future kerbside uses: Respondents could rank a proposed list of future kerbside uses as well provide their own suggestions for kerbside uses. This feedback is outlined in section 13 of this report.
  - Part 4 - Feedback on cost-of-living support: Respondents could comment on the proposed cost of living support package and provide suggestions for additional support offers. This feedback is outlined in section 14 of this report.
  - Part 5 – Equality and diversity monitoring form: Respondents provided demographic data, which is summarised in section 3 of this report.
- 2.4 For Parts 2 – 4, the responses to each open question in the survey were analysed by assigning each response to one or more themes that encompassed the sentiments expressed. Where the response was unrelated to the question asked, this response was labelled as 'Out of Scope'. For

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<sup>1</sup> Office for National Statistics, (2022). How the population changed in Camden: Census 2021. <https://www.ons.gov.uk/visualisations/censuspopulationchange/E09000007/>

<sup>2</sup> Office for National Statistics, (2023). 2021 Census Topic Summary Housing. <https://opendata.camden.gov.uk/People-Places/2021-Census-Topic-Summary-Housing/8k8f-7sbm>

example, if a comment about motorcycle charges was received under the open question for Car Club permits, this was considered out of scope. For email or paper responses that did not follow the structure of the survey and therefore did not respond directly to product-specific questions, responses were manually ascribed to the relevant permit or product-specific question.

### 3.0 CONSULTATION SURVEY RESPONDENT DEMOGRAPHICS

3.1 This section details the demographic profile of respondents. Responding to these questions was not mandatory and instances of 'no response' were recorded. In summary:

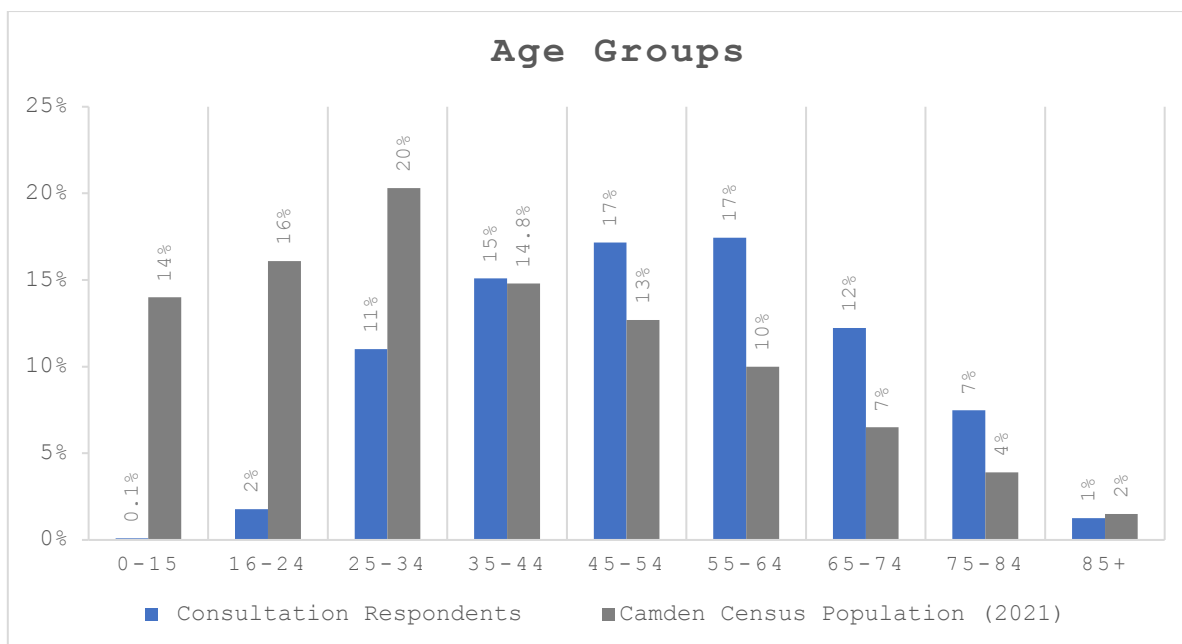
- 84% of respondents were Camden residents, 11% were visitors, and 2% were Camden businesses/organisations.
- 31% of respondents were female and 50% were male (note this does not add to 100% as some respondents did not reply), compared to the borough percentages of 53% for female and 47% for male, respectively.<sup>3</sup>
- 63% of respondents were heterosexual/straight, compared to 83% in all of Camden. The percentage of gay (4%) and bisexual (2%) respondents was similar to borough-wide numbers, 4% and 2.5% respectively.<sup>4</sup> 26% of respondents did not answer.
- 14% (or 388) of respondents indicated they were a disabled person, comparable to the 15% of Camden residents that are disabled.<sup>5</sup> Of those 388 respondents, 46% had a physical impairment, while 32% a long-standing illness. Another 21% had a mental health condition, 18% a sensory impairment and 12% a learning disability/difficulty. Note this does not add to 100% as respondents could have more than one disability. 67% of respondents stated they were not disabled while 19% of respondents did not answer.
- As shown in Figure 1 below, the age groups that provided the most responses were 45-54 years (17%) and 55–64 years (17%), followed by the 35-44 range (15%) and the 65-74 range (12%). The proportions are higher than the proportions of residents in these age groups across the borough (13%, 10%, 14.8% and 7% respectively). Those under the age of 35 were underrepresented in the survey, as compared to borough-wide numbers. This was especially the case for age groups 0-15 and 16-24 years old.

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<sup>3</sup> Office for National Statistics, (2023). 2021 Census Topic Summary Demography and Migration. <https://opendata.camden.gov.uk/People-Places/2021-Census-Topic-Summary-Demography-Migration/7vsp-bf9g>

<sup>4</sup> Office for National Statistics, (2023). 2021 Census Topic Summary Sexual Orientation & Gender ID. <https://opendata.camden.gov.uk/People-Places/2021-Census-Topic-Summary-Sexual-Orientation-Gende/p6xg-j2av>

<sup>5</sup> Office for National Statistics, (2023). 2021 Census Topic Summary Health, Disability & Unpaid Care. <https://opendata.camden.gov.uk/People-Places/2021-Census-Topic-Summary-Health-Disability-Unpaid/c9ef-2wkj>



*Figure 1 - Age Groups of respondents and Camden population*

- 36% of respondents stated they had no religion which mirrors the borough average of 35%. This is followed by over a quarter of respondents preferring not to say (28%), and 18% of respondents stating they are Christian. The percentage of respondents opting not to disclose their religion is notably higher than the borough percentage of 9%. The percentage of respondents identifying as Christian is lower than the borough percentage of 31%.
- 2% of respondents stated they are pregnant or were recently pregnant (within the last 26 weeks) and 17% of respondents had dependents aged 16 or under.

3.2 The graphs in Annex A display the results for each of these demographics in comparison to borough-wide data from the 2021 Census.

#### 4.0 CAR/VAN OWNERSHIP & TRAVEL PATTERNS AMONG RESPONDENTS

4.1 Car/van owners were disproportionately overrepresented in the survey compared to the boroughwide demographics. As shown in Figure 2, 83% of respondents indicated they owned or had access to a car/van, which is significantly higher than the borough-wide percentage of 36%.<sup>6</sup>

<sup>6</sup> Office for National Statistics, (2023). 2021 Census Topic Summary Housing.

<https://opendata.camden.gov.uk/People-Places/2021-Census-Topic-Summary-Housing/8k8f-7sbm>

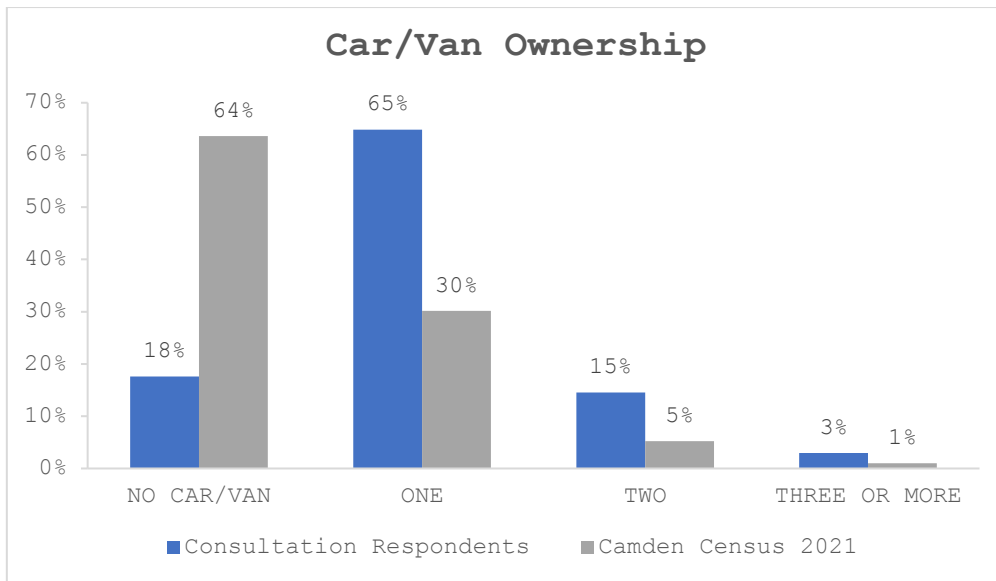


Figure 2 – Car/van ownership among respondents and Camden population

- 4.2 17% of respondents reported owning or having access to a motorcycle. In 2021, 205 Resident Permits were issued for motorcycles. This equates to less than .05% of Camden residents owning a motorcycle.
- 4.3 A breakdown of modal travel choice is shown below in Figure 3. In terms of how respondents travel, walking was the most frequent mode of travel, with 74% of respondents walking daily. Following this, both public transport and car (as a driver) were the second most favoured modes of travel, each chosen by 22% of respondents. Notably, public transport took precedence as the most popular mode for travelling 2-3 times a week (39%).
- 4.4 Cycling, although not as popular as walking and public transport, was a consistent choice of travel for respondents travelling daily (10%) and 2-3 times a week (12%). Conversely, cargo bikes across all frequencies were utilised by less than 1% of respondents.
- 4.5 In terms of respondents' car usage as drivers, the highest frequency was 2-3 times week (31%), with only 6% stating they drive a car less than once a month. 11% of respondents stated they travelled by car as a passenger 2-3 times a week and another 11% travelled as a passenger once a week. Among respondents who travelled via motorcycle, the most common frequencies were daily (7%) and 2-3 times a week (6%).

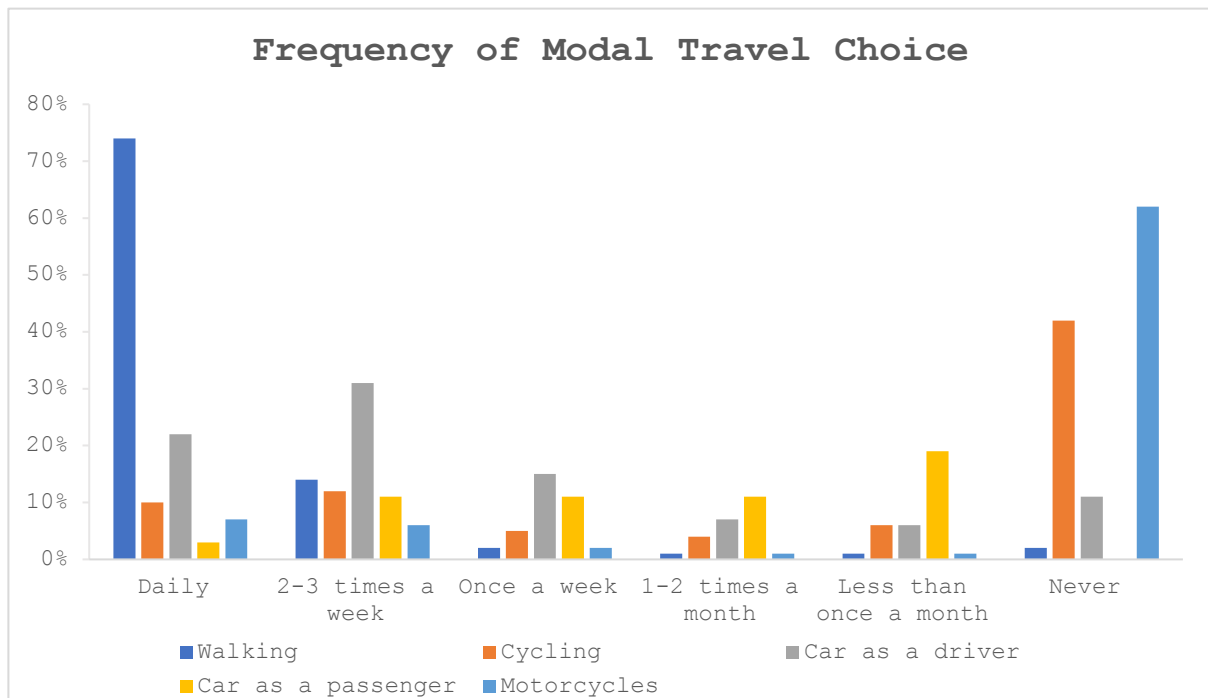
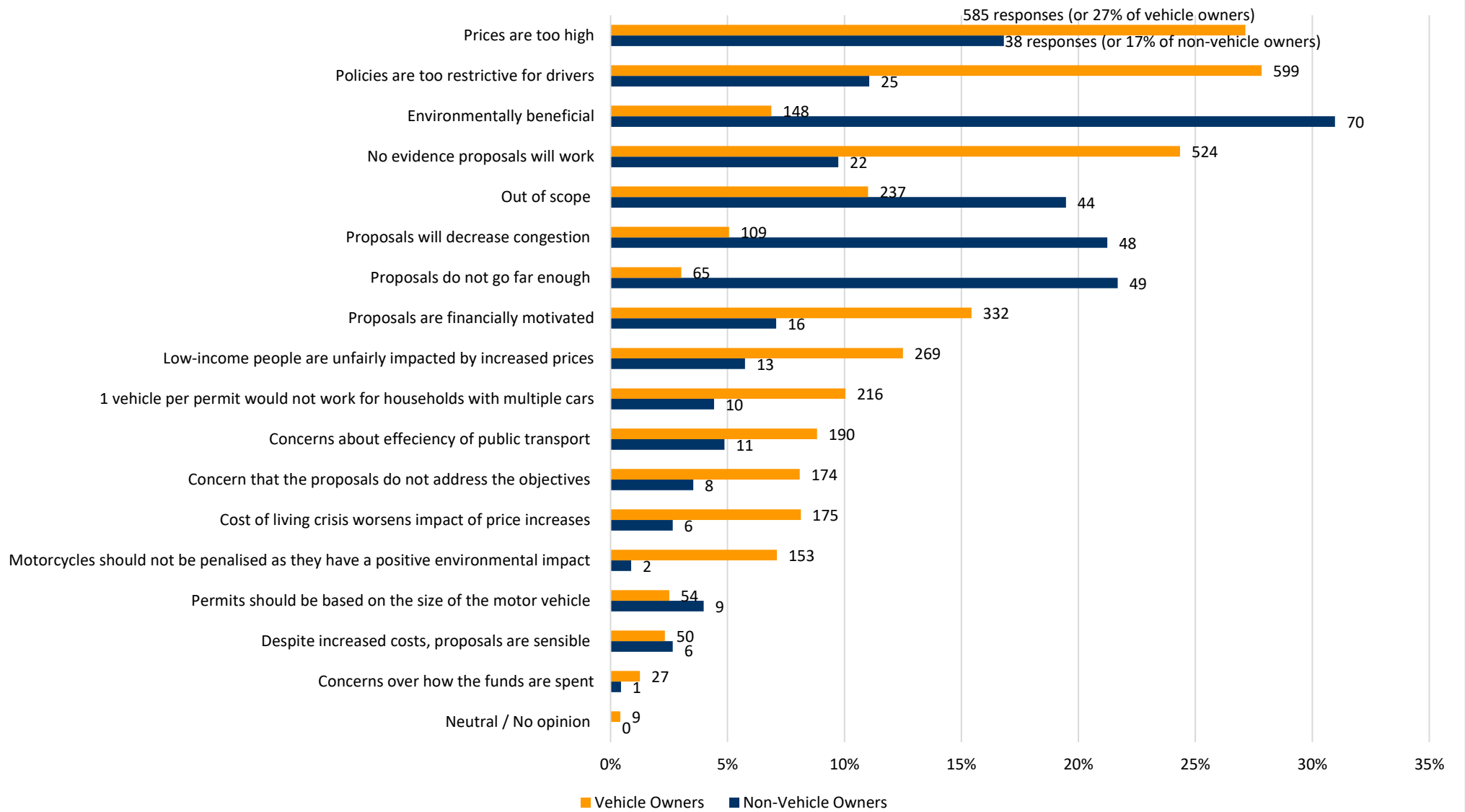


Figure 3 - Frequency of modal travel choice for respondents

## 5.0 STAKEHOLDER COMMENTS AND RESPONSES ON RESIDENT PERMIT CHANGES

- 5.1 Proposals for Resident permits included the introduction of an ultra-low emissions band for vehicles with 1 - 75 g/km of CO<sub>2</sub> emissions as well as the replacement of the Diesel Surcharge with an Air Quality Surcharge. The Air Quality Surcharge would apply to both older diesel vehicles (those first registered prior to September 2019) and older petrol vehicles (those first registered prior to September 2015). Furthermore, prices for Resident permits across all CO<sub>2</sub> emission bands except the 1-75 g/km band would increase. Many of the other parking products would see price increases under these proposals. Full details on these proposed charges can be found in the tables in Appendix 1. Finally, it was proposed that residents register only one vehicle per each Resident permit, whereas they can currently register up to three vehicles.
- 5.2 In total, 2,382 respondents provided comments regarding the proposed Resident permit changes. Of these, 2,101 stated that they were Camden residents and of these 2,101 residents, 1,800 were vehicle owners. Assuming that all 1,800 of these are Resident permit holders, this represents only 5% of all the Resident permits issued in 2022/23. Therefore, while out of all permit types, Resident permits received the highest number of responses, these numbers demonstrate that a large majority of Resident permit holders did not respond to the consultation, despite the direct and indirect communications about the consultation. For Resident permits, all the themes are shown in Figure 4 below and explored in detail in Annex A, with the top three themes addressed in the following sections.

## Resident Permit Themes with Number/Percentage of Responses



*Figure 4 - All themes for resident permits*



### **Theme A5.1: Prices are too high for Residents permits**

5.3 623 (or 22%) respondents expressed this sentiment. Of these respondents, 93% were car or motorcycle owners. Specifically, this theme encompasses the following sentiments:

- Price increases exceed rates of inflation.
- Proposed price for EV band is misaligned with Council objectives to encourage lower-emitting vehicles.
- Price increases will unfairly impact lower income residents.

#### *Officer Response*

5.4 The comment that the price increase for Residents permits exceeds inflationary increases is noted. However, if these proposals are implemented from April 2024, it will have been four years since the last significant price change to Resident permits (other than the annual Travelcard for Zones 1-4 plus 1% increase or corporate inflation if higher). In 2021, only 3% of permit holders were in the ultra-low carbon emission band (up to 75g/km) with the majority of permit holders in the bands between 76g/km and 185g/km (67%). Under the Climate Action Plan and the CTS, we have committed to achieve a zero carbon Camden by 2030, to emissions reduction targets for carbon dioxide (CO<sub>2</sub>), NO<sub>x</sub> and particulate matter, and to achieving a modal shift to more sustainable modes of travel. Parking fees and charges are a key policy lever available to us to help meet these overarching aims. Therefore, it is necessary that price increases to permits for higher carbon emission bands are applied to encourage a switch to the lower carbon emission band and/or to reduce motor vehicle ownership and use.

5.5 Increases are proposed for electric vehicles to incentivise their use only when their use is essential as they have non-exhaust air quality impacts, are not an active form of travel and contribute to traffic levels. Even at the proposed levels, the cost of an annual permit for electric vehicles would only be £138.90. This comes out to less than 40 pence a day to park at any time within the appropriate controlled parking zone in an inner London area with very high demand for kerbside space. This is an increase of £93.40 per year, or less than £2 extra per week than the current rate. Furthermore, it should be noted that there are a variety of existing benefits to EV owners that help reduce the cost of EV ownership. Electric vehicles benefit from a wide range of existing subsidies, including exemption from the congestion charge (until December 2025), from ULEZ, from vehicle tax and the Expensive Car Supplement (until 2025) and enhanced capital allowances for businesses for both electric vehicles and charging infrastructure. Camden is also committed to developing a comprehensive network of electric vehicle charge points as detailed in the [Electric Vehicle Charge Point Action Plan](#).

5.6 In response to the feedback that residents' charges are too high, it should be noted that even at the maximum possible charge (which includes the air quality surcharge for diesel), the daily charge is less than £2.30, which should be

considered within the context of the very high demand for kerbside space in inner London. As a mitigation to price increases, we have analysed data on emissions of current Resident permit vehicles and found that the majority of residents (54%) fall either in the 76–120 or 121-150 g/km bands. Under the proposed charges for the base charge, both bands would see an annual increase of £36.50, or equivalent to 10 pence extra a day. See table 1 below for a full breakdown of current and proposed charges and the current share of permit holders by emission bands. The prices have been proposed for all permits and charges in such a way that they incentivise (through lower prices) the lower-emitting band levels. Alongside schemes like the ULEZ scrappage scheme, we aim to see more permits issued at lower bands, whereby these permit holders will benefit from cheaper prices than permit holders with vehicles in higher bands. Finally, as a further mitigation, in response to feedback from the consultation, it is now proposed to phase these fees and charges in over 2 years instead of 1 year as set out in the consultation (refer to Appendix 1 for details of the increases over 2 years), including those for Resident permits. For a full list of post-consultation changes to the proposals, please see Appendix 9. This helps to support those impacted by the cost-of-living crisis and allows more time for residents to change to lower emission vehicles or shift their travel choices to alternative modes of travel.

*Table 1 - Annual and daily price difference under proposed charges*

Emissions Band	Number of permit holders (2022/23)	Current price (base charge only)	Proposed price (base charge only)	Annual price difference (daily price difference)
Electric	3,096 (9%)	£45.50	£138.90	+£93.4 (£0.26)
up to 75 g/km	1,737 (5%)	£146.30	£146.30	£0
76 – 120 g/km	9,080 (25%)	£146.30	£182.80	+£36.5 (£0.1)
121 – 150 g/km	10,582 (30%)	£192.00	£228.50	+£36.5 (£0.1)
151 – 185 g/km	6,912 (19%)	£249.20	£285.60	+£36.4 (£0.1)
185 – 225 g/km	2,852 (8%)	£327.10	£385.50	+£58.4 (£0.16)
Over 225 g/km	1,493 (4%)	£533.50	£558.90	+£25.4 (£0.07)

5.7 There were several comments specifically concerned with the impact on low-income households. These sentiments were expressed in greater percentages in areas with higher deprivation, specifically Camden Town, Kilburn and Saint Pancras and Somers Town. These wards, however, have some of the highest [Public Transport Accessibility Levels](#) (PTAL) scores (5 or higher), indicating high access to public transport. Furthermore, Camden data shows that car ownership among the most deprived areas of Camden is well below the borough average and in general, car ownership is higher in areas with less deprivation (see figure 5 below). More specifically, in the ten most deprived

LSAOs, average car ownership was 28%. Meanwhile, the borough-wide average is 37%.<sup>7</sup> Additional data on income level and vehicle ownership is explored in more detail in the Equalities Impact Assessment (see Appendix 2).

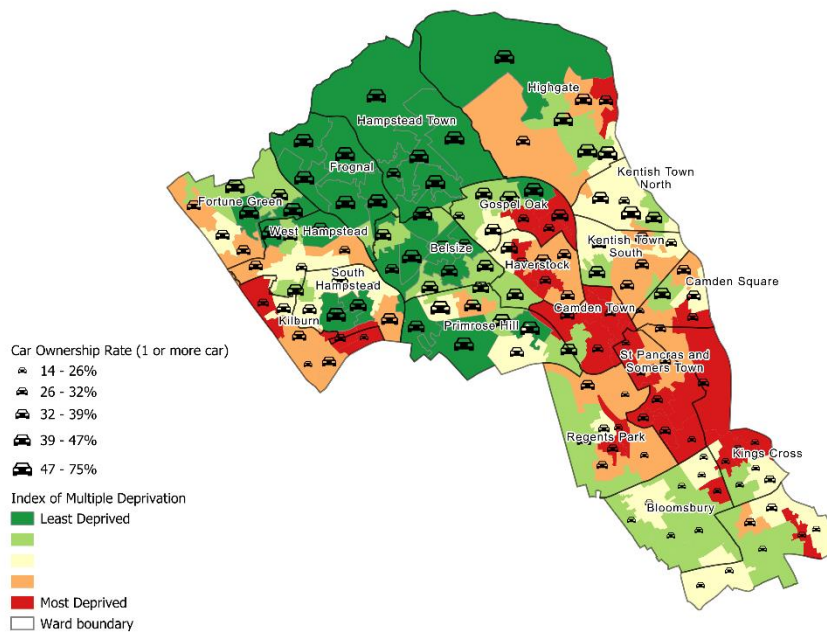


Figure 5 - Map of car ownership against index of multiple deprivation among Camden wards

- 5.8 However, to help mitigate the impact of the increased charges, the Council will expand its support offers to increase subsidies for car club use (beyond the existing offer of a 2-year free membership) in order to encourage shared car use over private car use. This is in addition to existing offers, which include discounted e-cycle rentals, Bus and Tram Discounts from TfL, the ULEZ Scrappage Scheme, and car club offers for Scrappage Scheme participants.

**Theme A5.2: Policies are too restrictive for drivers**

- 5.9 624 (or 22%) respondents expressed comments in line with this theme. 96% of those respondents were either car or motorcycle owners. Specifically, this theme encompasses the following sentiments:

- Respondents have a right to parking and the council should not restrict the number of vehicles per permit.
- Households with multiple car owners will have to get rid of their cars.

*Officer Response*

<sup>7</sup> Ministry of Housing, Communities & Local Government (MHCLG), (2020). Indices of Deprivation. <https://data.london.gov.uk/dataset/indices-of-deprivation>; <https://www.ons.gov.uk/datasets/TS045/editions/2021/versions/4>

- 5.10 The comments relating to respondents' rights to parking are noted however these have to be balanced with the policy goals set out in the Camden Transport Strategy, Clean Air Action Plan, Climate Action Plan, We Make Camden, Joint Health and Wellbeing Strategy, and various London-wide policies. Given that (i) We are facing climate change and air quality crises and our commitments relating to public health which these policy goals aim to address and (ii) The Camden specific policies were shaped by the priorities of our communities having all been adopted following extensive engagement such as public consultations, workshops and citizen assemblies, it is officers' views that parking should be facilitated as set out in the proposals including by limiting one vehicle per permit, to discourage inessential car ownership and use thus contributing to achieving policy goals.
- 5.11 Finally, it appears that some respondents misinterpreted the proposal of one vehicle per permit to mean that there could not be multiple vehicles per household. This is not, however, what is being proposed and multi-person households are not restricted to one vehicle. Rather, each adult in the household can have their own permit account and register a single vehicle under that permit account. At present, residents and businesses may register up to 3 vehicles to each permit although only one vehicle can be parked during hours of control.

**Theme A5.3: No evidence that proposals will meet the stated aims**

- 5.12 546 (or 19%) respondents expressed this sentiment. Of these, 94% were car or motorcycle owners. This theme encompasses the following concerns:
- The intent of the proposals is to increase revenue under the guise of environmental and air quality improvements.
  - Increasing prices is unlikely to reduce car use or ownership as those who are driving are doing it out of necessity.

*Officer Response*

- 5.13 The council has committed to reviewing parking fees and charges regularly as a means of delivering environmental and transport objectives in line with relevant policies. These policy objectives are the sole reason for seeking to introduce the proposed changes, in line with legislation. In accordance with our constitutional duties, the potential resource implications of the proposals are reported (see main report) alongside legal and environmental implications.
- 5.14 At current charging levels, we have seen that almost 8 times more Resident permits are associated with electric vehicles in 2022/23, compared to 2018/19. During this same period, there was a 74% reduction in permit transactions for vehicles over 186 g/km of CO<sub>2</sub> emissions. Furthermore, total number of Resident permits issued over this period reduced by 10%. While these changes are welcome, the Council must take stronger action in the context of Camden's current policies. It is anticipated that similar patterns will be observed with the proposed increases.

- 5.15 A surcharge level of 50% for older diesel vehicles has been proposed because the current level of 21.5% of the permit price does not reflect Camden's ambitions to meet the WHO air quality guidelines and data from elsewhere in London shows this can be effective in contributing to the desired outcomes of reduced diesel vehicle usage/ownership. For example, Westminster Council saw a 16% reduction in the amount of older diesel vehicles parking in its "F" parking zone following the introduction of a 50% differential between pre – 2015 diesel and other vehicles in this zone for paid for parking. A Diesel Surcharge was introduced in Camden in 2018 and between 2018/19 and 2022/23, there was a 49% reduction in diesel vehicles in Camden. However, the current Diesel Surcharge does not consider that Euro 6d and Euro 6d-TEMP compliant diesel vehicles (first registered from September 2019) are far cleaner than some older diesel and petrol vehicles. Under the proposal, new diesel vehicles would not be subject to the Air Quality Surcharge.
- 5.16 As older petrol vehicles also contribute significantly to air pollution and carbon emissions, we are proposing they are subject to the new Air Quality Surcharge, with the aim of achieving a similar reduction in older petrol vehicles in Camden. It is applied to older petrol vehicles, because those that predate Euro 6 are likely to be more polluting than the Euro limits suggest. There is evidence that Euro 3, Euro 4 and Euro 5 petrol vehicles had real-world nitrogen oxides (NOx) that were ~1.8x, ~1.5x and ~1.3x higher than the allowed Euro limits, and this was down to about 1.1x for Euro 6. Additionally, there was no particulate matter (PM) limit for petrol until Euro 5, and no particle number limit until Euro 6, so a surcharge for pre-Euro 6 petrol vehicles is aimed at discouraging vehicles with more limited control of health-damaging PM emissions. There is [evidence](#) to suggest that petrol vehicles emit more NOx as they age possibly due to degradation of the catalytic exhaust treatment technologies.<sup>8</sup>
- 5.17 Unlike the previous diesel surcharge, the Air Quality Surcharge would only affect older diesel vehicles to recognise that Euro 6d and Euro 6d-TEMP compliant diesel vehicles are far cleaner than some older petrol and diesel vehicles. The surcharge for diesel vehicles is a higher percentage of the permit price than for petrol vehicles to recognize that the non-conformity with Euro emissions limits (the difference between the allowed emissions and the real-world emissions) has been found to be larger for diesel vehicles than for petrol vehicles of equivalent Euro engine standard, for Euro 4, Euro 5 and pre-Euro 6d-TEMP vehicles, with older diesel vehicles emitting more NOx, particulate matter and hydrocarbon per kilometre. It is therefore considered reasonable for the diesel surcharge for pre-Euro 6d-TEMP diesel vehicles to be set at a higher rate than for pre-Euro 6 petrol vehicles, to account for the overall balance of impacts upon local air quality and climate. Finally, in Camden, many journeys taken by car are short, 40% are under 2km and 70% are under 5km, suggesting

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<sup>8</sup> D Carslaw, S Beevers, *et al*, (2011). Trends in NOx and NO2 emissions and ambient measurements in the UK – Final. [https://uk-air.defra.gov.uk/library/reports?report\\_id=673](https://uk-air.defra.gov.uk/library/reports?report_id=673)

that many could be walked, cycled or made through public transport and shared mobility services instead.<sup>9</sup> Data from TfL suggests that around 260,000 trips a day made by a vehicle could be made by walking or cycling instead.<sup>10</sup>

5.18 If implemented, all the proposed changes, including those to Resident permits, will be closely monitored to ensure they are effectively meeting their stated objectives. Specific metrics that will be reviewed as part of this monitoring include overall permit sales broken out by permit type and emissions band, overall paid for parking sales broken out by emissions band and paid for parking stay duration and number of bike hires/drop-offs within Camden. Indirect metrics will also be monitored including air quality data (e.g. NO<sub>2</sub>, PM<sub>10</sub> and CO<sub>2</sub> emissions) from road transport in Camden, mode share, and motor traffic levels. This data will be reported via annual Scrutiny reports as part of CTS and CAP updates and to Cabinet as applicable and will also be used to assess any further proposed changes to parking fees and charges and terms and conditions.

## 6.0 STAKEHOLDER COMMENTS AND OFFICER RESPONSES ON THE PROPOSED CHANGES TO BUSINESS PERMITS

6.1 In total, 1,002 people commented on the proposed changes to Business permits, the second least number of responses received of all the permit/parking products. 338 felt neutral or had no opinion about the proposed changes. Of 1,002 respondents, 37 stated that they were businesses in Camden. This represents less than 4% of all Business permits issued in 2022/23, which is a relatively low response from those who might be impacted by proposed changes. Given that there were 59 total businesses who responded to some part of the consultation, this also means that 22 businesses chose to not respond to this specific question regarding proposed changes to Business permits. All the themes are shown below in Figure 6 and explored in Annex C, with top themes addressed in the following sections.

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<sup>9</sup> Camden, (2019). [Healthy Streets, Healthy Travel, Healthy Lives: Camden Transport Strategy 2019-2041.](#)

<sup>10</sup> Camden, (2019). Appendix G Camden Transport Strategy Evidence Base Report. [https://www.camden.gov.uk/documents/20142/4470853/Appendix+G\\_CTS+Evidence+Report\\_Update\\_d\\_FinalVersion\\_310119+%28002%29.pdf/3c191a6b-e1b4-9915-9a91-b3eb5ebf52e8](https://www.camden.gov.uk/documents/20142/4470853/Appendix+G_CTS+Evidence+Report_Update_d_FinalVersion_310119+%28002%29.pdf/3c191a6b-e1b4-9915-9a91-b3eb5ebf52e8)

### Business Permit Themes with Number of Responses

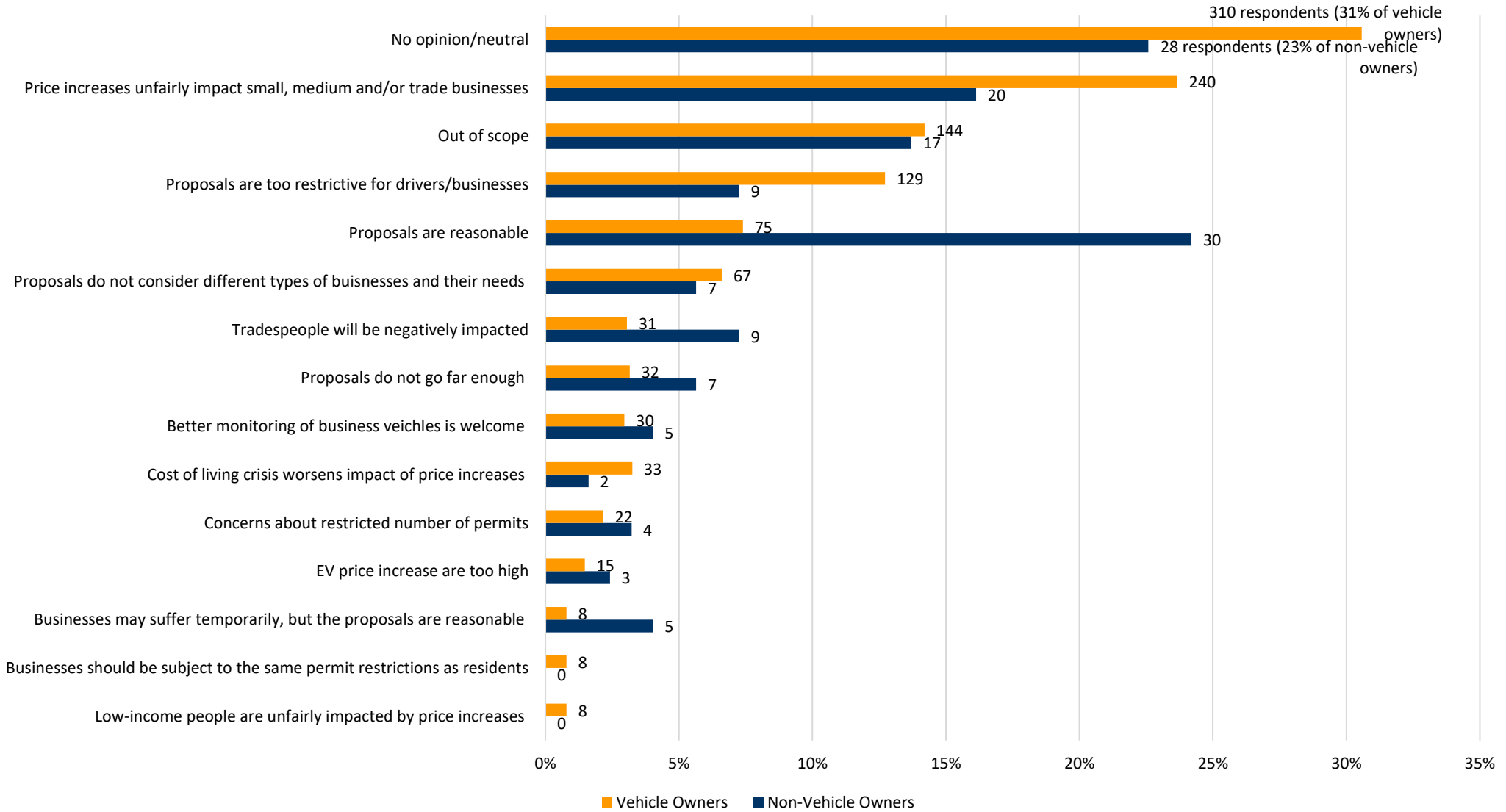


Figure 6 - All themes among Business permit responses

**Theme A6.1: Price increases unfairly impact small, medium and/ or trade businesses.**

6.2 260 (or 9%) respondents expressed this sentiment. Examples of specific concerns include:

- Businesses are already struggling financially, which will be perpetuated by increased costs of permit prices.
- Businesses will close and move out of Camden.
- Small and local businesses cannot afford the price increases.

*Officer Response*

6.3 The concerns of the impacts of the Business permit proposals on small/medium businesses are noted. However, it is difficult to justify maintaining the current charging approach of a flat rate for business permits despite the level of carbon emissions, allowing multiple vehicles per permit and not taking further action relating to air quality when we have committed to a net zero Camden by 2030 under the Climate Action Plan and adopted the revised WHO air quality standards, and ambitious mode shift and related targets in the CTS.

6.4 Prices for Business permits in Camden have not been reviewed since 2012 other than 2016 when the diesel surcharge was applied to Business and Doctor permits. Other than these additions, Business permits have only gone up by the annual Travelcard for Zones 1-4 plus 1% increase or corporate inflation if higher. As a result, current Business permit prices are much lower than many of our equivalent benchmarked Boroughs (see Appendix 6 for more details) and furthermore, out of step with the level of ambitions set out in the CTS, CAP and CAAP in terms of mode shift and environmental objectives. Furthermore, as a mitigation, we have looked closely at which bands Business permit holders are expected to fall into based on data about current permit holders. As shown below in Table 2, the largest share of current Business permit holders (29%) falls in the 121 – 150 g/km emission band and would therefore see an annual increase of £184.3 for their base charge, or an extra 50 pence a day. For diesel vehicles in this band, they would see an annual increase of £440.8 if they are subject to the new air quality surcharge, which amounts to £1.20 extra a day.

*Table 2 - Annual and daily price difference under proposed charges and number of Business permits affected by band*

Emissions Band	Number of permit holders (2022/23)	Current price (base charge only)	Proposed price (base charge only)	Annual price difference (daily price difference)
Electric	187 (13%)	£104.70	£398.10	£293.4 (£0.8)
up to 75 g/km	54 (4%)	£419.10	£419.10	£0
76 – 120 g/km	279 (19%)	£419.10	£502.90	£83.8 (£0.23)



121 – 150 g/km	416 (29%)	£419.10	£603.40	£184.3 (£0.5)
151 – 185 g/km	296 (20%)	£419.10	£724.00	£304.9 (£0.84)
185 – 225 g/km	138 (10%)	£419.10	£941.20	£522.1 (£1.43)
Over 225 g/km	78 (5%)	£419.10	£1,270.60	£851.5 (£2.33)

6.5 In other boroughs with much higher permit prices, we are not aware of evidence that small and medium-sized enterprises are closing as a result. However, support for small businesses and charities to transition to lower emission vehicles is available through the ULEZ van and minibus scrappage scheme, where they can receive up to £11,500 to scrap and /or replace eligible vehicles. Furthermore, to mitigate against the impacts of the price increase, the following is proposed:

(i) To phase these fees and charges in over 2 years instead of 1 year as set out 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 businesses, including small and medium-sized businesses, to change to lower emission vehicles or shift their travel choices to alternative modes of travel.

(ii) Camden will provide a car club scrappage scheme for businesses whereby any business that gives up a parking permit will be given a free car club membership and driving credits subject to availability.

(iii) The conversion of Business Visitor permits to Business Hourly permits facilitates parking for businesses with an occasional need for a car rather than purchasing an annual permit.

(iv) The removal of dedicated parking bays means that new Business permit applicants south of Euston Road will save around £3,340, as these businesses currently fall under Business Scheme A and are charged to cover the cost of the statutory consultation and bay installation.

#### **Theme A6.2: Proposals are too restrictive for drivers/ businesses**

6.6 138 (or 4%) respondents expressed this theme. Overall, the following concerns were expressed by respondents:

- It is unfair to restrict or discourage vehicle use when some businesses require vehicles for transporting heavy goods and day-to-day operations.
- Tradespeople need to use vehicles for their equipment and to service homes in the area.

#### *Officer Response*

6.7 As set out in section 6.3, it is difficult to justify maintaining the current approach for facilitating parking for business permit holders. The prices and permit terms and conditions have been updated in an effort to respond to the borough and wider London's critical air quality and climate challenges. However, under the

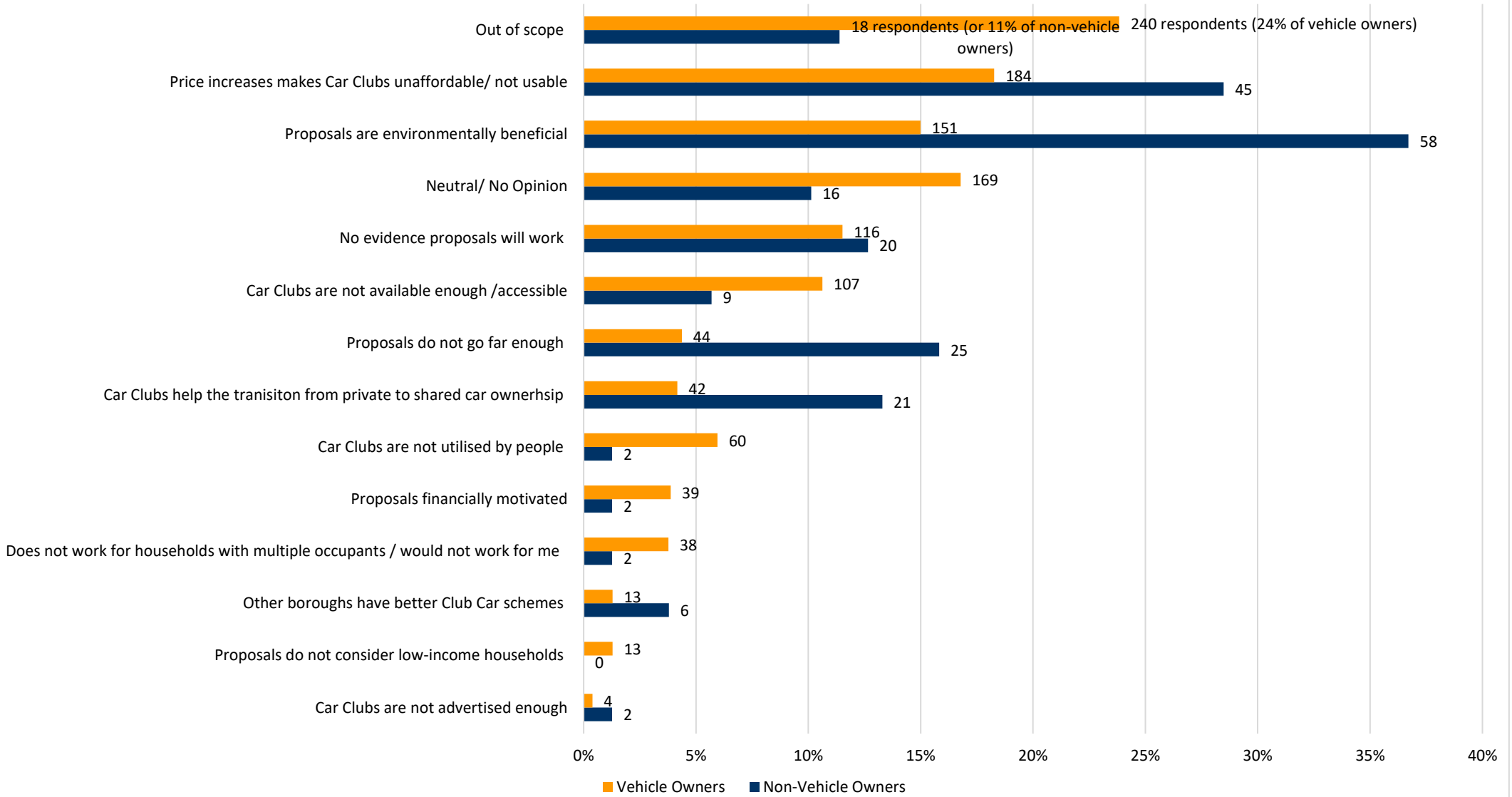
proposals, businesses with an essential need for motor vehicles would still be issued permits for them. Additionally, in offering the Hourly Business permit, it is the intent of the council to provide businesses with a more flexible option for parking in which they can pay hourly for when everyday car use is not needed.

6.8 In relation to tradespeople, the permit for this need is not in scope of this review and no proposals have been put forward to change it at this time. Any comments received in relation to tradespeople have been noted and will be considered when a review of this permit is undertaken.

## 7.0 STAKEHOLDER COMMENTS AND OFFICER RESPONSES ON THE PROPOSED CHANGES TO CAR CLUB PERMITS

7.1 1,168 responses were received regarding Car Club permits, including an email response from Zipcar, who operate in Camden (Camden's other car club operator, Enterprise, did not respond to the consultation). All the themes are shown below in Figure 7 and in Annex C while the two main themes are addressed in the following sections.

## Car Club Permit Themes with Number of Responses



*Figure 7 - All themes for Car Club permit responses*

## **Theme A7.1: Price increases make car clubs unaffordable and/or not usable**

- 7.2 This theme was expressed by 229 (or 8%) respondents. Examples of specific concerns include:
- The pricing parity between car clubs and businesses is unjust, considering that car clubs offer a sustainable alternative to private car ownership.
  - Car clubs are too expensive and not readily available to be a suitable alternative to private car ownership.

### *Officer Response*

- 7.3 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 that may (as previously) need additional support to help establish in the Borough, and given the transport and environmental targets and contexts set out previously. Data from Collaborative Mobility UK shows that membership in London increased by 125% between 2019 and 2022 (from 296,367 to 667,440).<sup>11</sup> Prices for car club permits in Camden have not been reviewed since 2012. Since then, car club permits have only gone up by the annual Travelcard for Zones 1-4 plus 1% increase or corporate inflation if higher. Our benchmarking shows that current prices are very low compared to similar Boroughs. As permits would no longer be issued for car club vehicles greater than 150 g/km carbon emissions, the highest possible permit price would be £905.10 annually, or less than £2.50 daily. Furthermore, Zipcar has made commitments to be fully electric by 2025 in the UK and would therefore fall into the lowest band of permit charges. In this case, the daily increase in permit price would amount to £0.20.
- 7.4 The comments that car clubs are too expensive are noted and will be raised with operators when we hold meetings with them. In the meantime, the Council currently subsidises costs for residents who give up their parking permit with a two-year free car club membership. Under the proposals, this offer will be enhanced and extended to cover those businesses that give up their permits too, as well as driving credits, subject to availability.
- 7.5 With regards to the point that car clubs are not readily available to be a suitable alternative to private car ownership, it should be noted that a study by CoMoUK found that in 2022, on average, each car club vehicle took 22 private cars off the streets in the UK.<sup>12</sup> As set out in the CTS, the Council supports the uptake of car clubs accordingly but permit prices also need to reflect the Borough's environmental ambitions.

## **Theme A7.2: No evidence proposals will work**

<sup>11</sup> CoMoUK, (2023). CoMoUK Annual Car Club Report - London. [https://uploads-ssl.webflow.com/6102564995f71c83fba14d54/64c0e0158a27b563b84d669d\\_CoMoUK%20Car%20Club%20Annual%20Report%20London%202022\\_v02.pdf](https://uploads-ssl.webflow.com/6102564995f71c83fba14d54/64c0e0158a27b563b84d669d_CoMoUK%20Car%20Club%20Annual%20Report%20London%202022_v02.pdf)

<sup>12</sup> CoMoUK, (2023). CoMoUK Annual Car Club Report UK.

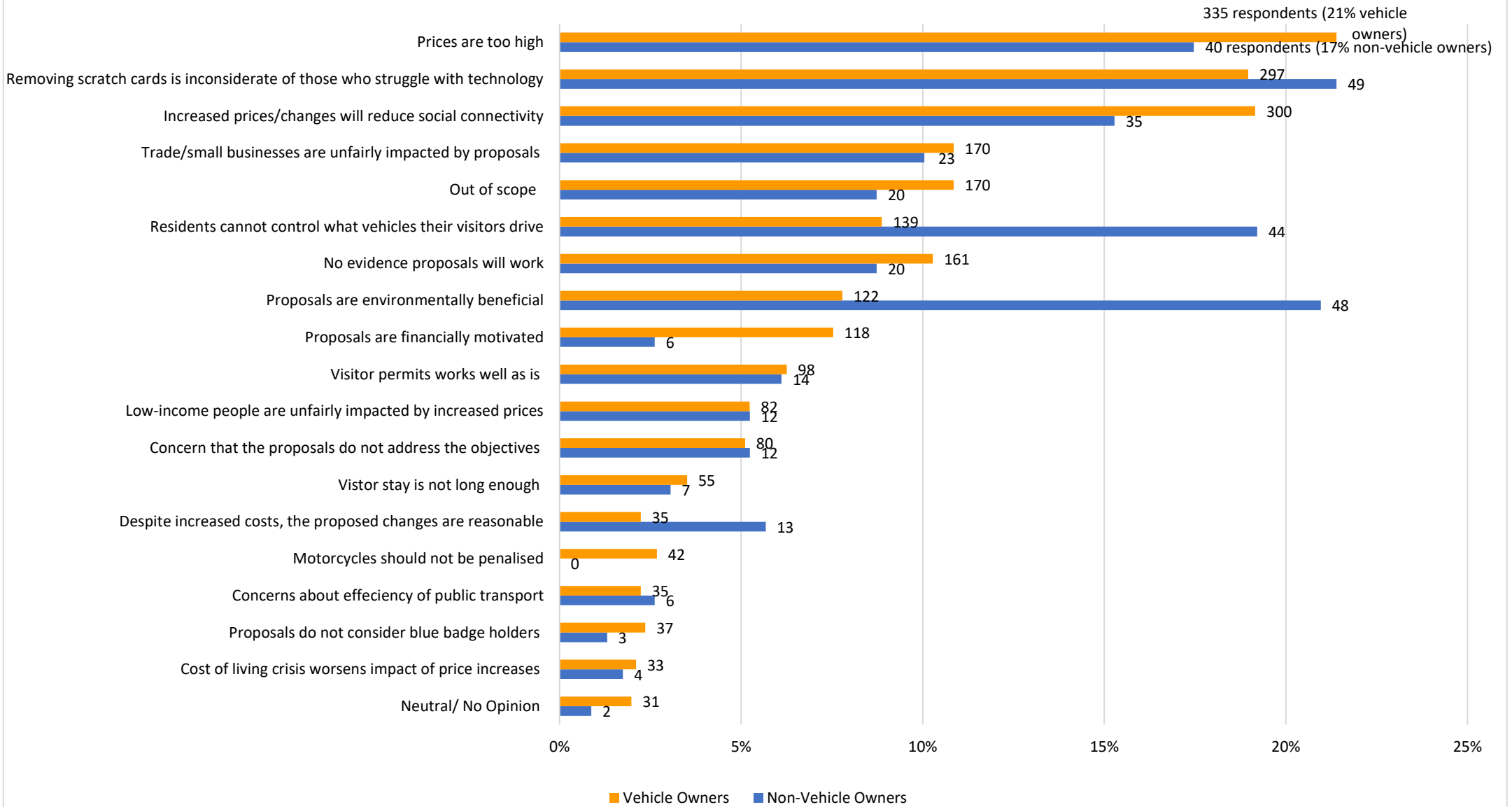
- 7.6 This theme was expressed by 136 (or 4%) respondents. Examples of specific concerns include:
- Car clubs will have a limited impact on improving air quality if they are still allowed to use diesel vehicles.
  - Car clubs are not utilised enough by residents to have a significant impact on private car ownership in the borough.
  - Increased prices of car club permits are counterintuitive to helping reduce private car ownership.

#### *Officer Response*

- 7.7 The proposed charges, including the Air Quality Surcharge, are aimed to encourage car club companies to transition away from older, more polluting diesel vehicles, thereby contributing to improved air quality. Furthermore, by only providing permits to cars with emissions up to 150 g/km, this proposal encourages car clubs to consider electric vehicles.
- 7.8 Regarding car clubs not being utilised enough by residents to have a significant impact on private car ownership, it should be noted that this proposal is only element of a larger range of measures intended to reduce private car ownership, as detailed in the [Camden Transport Strategy](#). Other measures include streetscape improvements to encourage walking in accordance with Camden's [Walking and Accessibility Action Plan](#), cycling infrastructure improvements in accordance with the [Cycling Action Plan](#), regular reviews of parking fees and charges, expanded cycle hire systems and public transport improvements.
- 7.9 Benchmarking with similar and neighbouring boroughs shows that proposed Camden's Car Club permit prices would be within the range of prices among other boroughs. Furthermore, as mentioned above, residents and businesses can receive a two-year free membership in lieu of their parking permit, helping to reduce the cost of car club use.
- 8.0 STAKEHOLDER COMMENTS AND OFFICER RESPONSES ON THE PROPOSED CHANGES TO VISITOR PERMITS
- 8.1 It is proposed that a simplified emissions-based charging structure be introduced for Visitor permits and that the Air Quality Surcharge also be applied. Charges would increase for all emissions bands except EVs. Scratch cards would no longer be available in order to facilitate the application of emission-based charging to Visitor permits. Those over 75 years old and disabled residents would continue to receive discounted Visitor permits.
- 8.2 In total, 1,794 responses were received regarding Visitor permits. Based on the volume of responses (second only to Resident permits), it is evident that respondents maintained strong viewpoints on the proposed changes to Visitor permits. The themes expressed by respondents are shown in Figure 8 below

and explored in Annex C, with the most common themes address in the following sections.

## Visitor Permit Themes with Number of Responses





*Figure 8 - All themes among Visitor permit responses*

### **Theme A8.1: Prices are too high.**

8.3 This theme was expressed by 375 (or 13% of) respondents. Overall, respondents expressed that the proposed price increase was unreasonable in comparison to current charges. Example of specific concerns include:

- Price increases are not considerate of low-income households and the average living wage in Camden.
- Current prices are already high, and any increases should be in line with inflation.

#### *Officer Response*

8.4 The price increases for Visitor permits are proposed to help Camden meet the ambitious targets outlined above in sections 5.4 and 5.10. Benchmarking shows that current prices are lower than several inner London Boroughs. Prices for Visitor permits in Camden have not been reviewed since 2012. Since then, Visitor permits have only gone up by the annual Travelcard for Zones 1-4 plus 1% increase or corporate inflation if higher. As noted above, the majority of Camden is well-connected by public and shared transport and visitors are encouraged, where possible, to use more sustainable modes of travel for their visits. Furthermore, data broadly indicates that areas in Camden with higher levels of deprivation, measured by the index of multiple deprivation, often have very high levels of PTAL (and shared transport services like micro-mobility), providing alternative options to private vehicle ownership and use.<sup>13</sup> To mitigate concerns over price increases, however, Visitor permit price increases will be phased-in over a two-year period. Furthermore, as mentioned above, discounted Visitor permits would still be available for those over 75 years old and disabled people and it is proposed that the allowance of 600 hours of short stay and 10 all day Visitor permits per individual currently offered for CPZs north of Euston Road be extended to CPZs south of Euston Road. A full consideration of the impacts of the proposal on low-income households, with mitigations, is contained in the Equalities Impact Assessment in Appendix 2.

### **Theme A8.2: Removing scratch cards will impact those who struggle with technology**

8.5 346 (or 12% of) respondents expressed this sentiment. Examples of specific concerns include:

- Elderly residents who struggle with technology may have difficulty using an online system.
- Not every resident has access to the internet, making scratch cards necessary.
- Residents should receive compensation for their current scratch cards should they be removed.

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<sup>13</sup> Transport for London, (2015). WebCAT Planning Tool. <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat>

## Officer Response

- 8.6 Over the last 10 years, the use of scratch cards has steadily declined in Camden. They have not been available to new customers since 2021 and currently, 6% of all accounts use scratch cards. The vast majority of Visitor permits are paid via the online system. At the same time, access to internet has increased. The [Office of National Statistics](#) estimates that 96% of households in Great Britain have internet access as of 2020, increasing from 93% in 2019 and 90% in 2018. Although some councils have retained scratch card usage, there are councils in London who have or will remove them, including Kensington & Chelsea and Waltham Forest. However, for anybody who is unable to use the online system, they can have a nominated person, who can use the online system to book a parking session. Furthermore, Contact Camden will still be available to support customers by phone. Any scratch cards currently in possession by Camden residents would still be valid following the adoption of this proposal.
- 8.7 As a further mitigation, the Council proposes to retain scratch cards for Assisted Customers, or those customers registered by Contact Camden as digitally excluded. Scratch cards for Assisted Customers would be charged at a base rate as shown in Appendix 1. Furthermore, if the proposals are approved, the Council would introduce an Integrated Voice Recognition (IVR) telephone service to assist with parking requests when during out-of-hours. When using the IVR service, the resident will need to have a parking permit account with a valid telephone number (landline or mobile). On calling Contact Camden the IVR option will be made available as part of the options. The resident will then 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. This can increase to 100 seconds when the resident is adding a new vehicle and/or payment card. Multiple numbers can be set up on an account such that a resident's relative could make a payment on the resident's behalf, supporting the resident where needed. Where a customer has issues with the IVR (e.g. language recognition) then they are directed to the suppliers contact centre who can help. This is about 0.25% of all calls. Volumes and complaints would be monitored to minimise the impact of the removal of scratch cards on residents.

### **Theme A8.3: Proposals will reduce social connectivity**

- 8.8 335 (or 12% of) respondents expressed this sentiment. Among the responses, people were specifically concerned about:
- The increased cost of having family and friends visit (in combination with existing ULEZ and congestion charges)
  - The need for tradespeople to park to provide their services to residents.

## *Officer Response*

- 8.9 Camden benefits from a robust public transport network that is well connected to other areas of London and the wider UK. The average PTAL score, which is a rating for the accessibility of an area to the public transport network, for Camden is 5 (the third highest score available). This score makes Camden the fourth most accessible borough in London, behind City of London, Islington and Westminster.<sup>14</sup> Visitors to Camden can make use of alternative modes of transport, including the extensive public transport network, and increasingly extensive shared transport options. Furthermore, elderly and disabled people are still able to purchase discounted visitor permits.
- 8.10 It should also be noted that tradespeople have their own dedicated permit type (Trade permits), which can be used to access parking throughout the borough. This permit type will be reviewed in a future consultation to ensure it better aligns with the needs of tradespeople and their customers.
- 9.0 STAKEHOLDER COMMENTS AND OFFICER RESPONSES ON THE PROPOSED CHANGES TO PAID FOR PARKING
- 9.1 In total, 1,483 responses were received with respect to Paid for Parking changes. The themes expressed are shown in figure 9 below, with all themes explored in Annex C, and the main themes addressed in the following sections.

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<sup>14</sup> Transport for London, (2014). Public Transport Accessibility Levels. HYPERLINK "<https://data.london.gov.uk/dataset/public-transport-accessibility-levels?resource=8e520b81-dd06-4ce6-aaa0-972dccf84b57>"<https://data.london.gov.uk/dataset/public-transport-accessibility-levels?resource=8e520b81-dd06-4ce6-aaa0-972dccf84b57>

### Paid for Parking Themes with Number of Responses

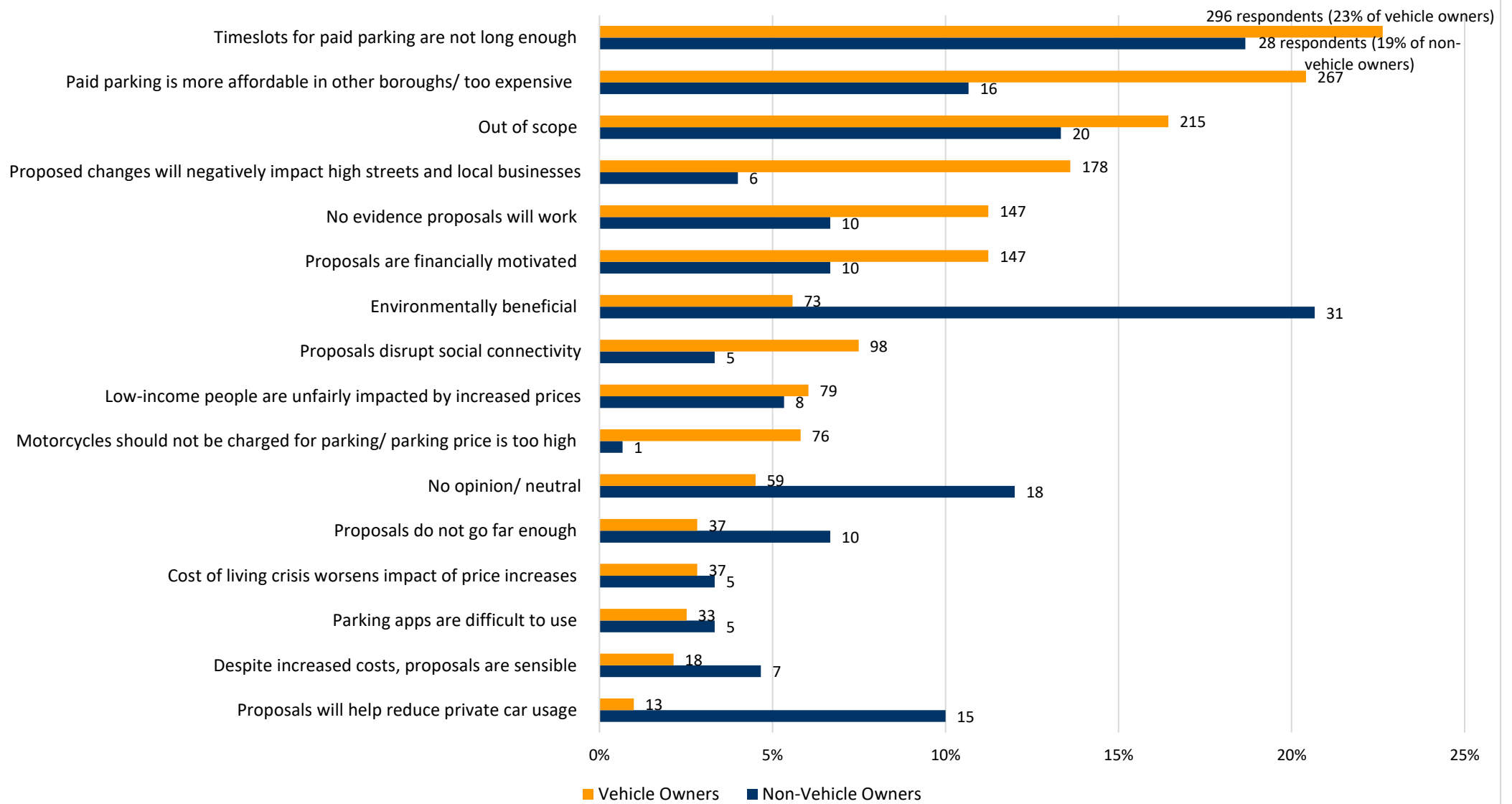


Figure 9 - All themes among paid for parking responses

**Theme A9.1: Two hours (or one hour) in CPZ for paid parking is not long enough**

- 9.2 324 (or 11%) respondents expressed this theme. Respondents were predominantly concerned about the impact of shortened parking on social connectivity and essential car journeys. Examples of specific concerns include:
- 2 hours is not long enough for certain activities like hospital visits.
  - Reducing the maximum stay will limit the time one can spend with family and friends.
  - Reducing the maximum stay will dissuade people from visiting Camden.

*Officer Response*

- 9.3 The Council has noted the concerns over length of stay around hospitals. 13 hospitals have been identified within Camden boundaries, of which 12 receive the highest or second highest score for public transport accessibility. Only Royal Free Hospital received a lower score, although this hospital has its own car park. It should be noted that 2-hour maximum stays are already in operation in many bays around hospitals south of Euston Road and patients are still able to attend appointments. Besides Royal Free Hospital, hospitals north of Euston Road have similar PTALs to those south of Euston Road. Furthermore, blue badge holders are allowed to park in permit holder bays and paid for parking at no cost for an unlimited period of time in the north of the borough. However, in response to the consultation feedback, it is proposed to maintain any existing 4-hour maximum stay parking bays that fall within a 100-metre radius of hospitals to support patients and visitors visiting the hospital.
- 9.4 With respect to concerns over the maximum stay limiting social engagements and visitors, it should be noted that the 2-hour maximum stay is already in operation in most parts of the borough. Furthermore, the average transaction duration across all CPZs and maximum stays over the last three financial years was 75 minutes, demonstrating that current demand for parking bays is usually lower than 2 hours at present. As such, the proposed maximum stays are more in line with how the majority of bays are currently used and furthermore, are intended to discourage commuters from using parking bays to park for the full working day and instead, encourage the use of active transport for these trips. Shorter maximum stays will also encourage greater turnover of parking bays. Finally, as noted above, Camden has high PTAL levels, and an increasingly dense shared transport accessibility level, meaning that visitors and people travelling within the borough can make use of Camden's public and shared transport systems.
- 9.5 Finally, under the proposed new parking charges, the price of a 4-hour parking stay in some tariff areas would be close to or even exceed the price of a penalty charge notice, which is £40. For example, under the proposed charges, a petrol vehicle of 110 g/km of carbon emissions subject to the Air Quality surcharge would pay £39.8 for 4 hours of parking in Tariff Area 3 (if the 4-hour maximum

was to remain). This may not incentivise compliant parking as it is essentially the price of a penalty charge notice. By reducing the maximum stay to 2-hours, the maximum price that this vehicle could pay becomes £19.9, which creates a larger difference between the parking charge and the penalty charge notice, thereby incentivising compliant parking.

**Theme A9.2: Paid for parking is too expensive, especially compared to other boroughs**

9.6 283 (or 10% of) respondents expressed this theme. Examples of specific concerns include:

- Other boroughs have more discounted prices for EVs in paid for parking bays.
- Price increases are not considerate of the current cost of living crisis.
- Increased prices restrict the movements of Camden residents.

*Officer Response*

9.7 Camden recognises that some charges may be higher than other boroughs. However, it should be noted that at present Camden has one of the most ambitious Transport Strategies in London (including ambitious targets around mode shift to sustainable modes, and reductions in traffic levels), and Camden's intention is to be at the forefront of committing to address air quality and the climate crisis. As detailed in the Clean Air Action Plan, Camden has committed to achieving the revised and more stringent air quality guidelines set out by the World Health Organization by 2030 for PM10 and 2035 for PM2.5. Meeting these ambitious targets requires considerable efforts across all fronts. Camden was also the first council in the country to have a Citizen's Assembly on the Climate Emergency. Additionally, as part of the Mayor's Transport Strategy (MTS), targets have been set for each borough across a number of areas including substantial reductions in CO2, NOx and PM10 by 2041, and interim targets set for 2021 and 2031. Targets set for Camden to achieve the wider MTS reductions are ranked among the top 3 in inner London boroughs in terms of the extent of reductions required. The Paid for Parking charges were updated and set with these ambitious targets and timelines in mind.

9.8 For the prices for electric vehicles, it should be noted that, except for Paid for Parking bays in current Tariff Area 1, there are no proposed increases for electric vehicles for paid for parking. The share of electric vehicles among total Paid for Parking transactions has been steadily increasing in Camden (while total transactions have been decreasing). Data for 2022/23 shows electric vehicles made up 10% of all transactions (from 7% in 2021/22 and 3% in 2020/21). During this time, no significant changes were made to electric vehicle prices, so we propose to maintain the current electric vehicle price with the hopes that these trends will continue.

9.9 As mentioned above, it is proposed that all charge increases are implemented over the course of two financial years, including those for Paid for Parking. The only exception is the electric tariff for the area 1 because this would not be

possible as it would require applying two different charges in the same tariff area. This would lead to a complicated parking system and be difficult for motorists to understand and for the council to enforce. This is intended to help to support those impacted by the cost-of-living crisis and allows more time for Paid for Parking users to change to lower emission vehicles or shift their travel choices to alternative modes of travel.

- 9.10 Finally, it should be noted that only 1/3 of Camden households own a car/van and only 13% of Camden resident trips are made by car. Both of these suggest that price increases for parking permits will not restrict the movements for a large share of Camden households. Finally, the Borough has a very extensive network of public, shared and accessible transport services to provide alternative options to motor vehicle use for travelling throughout the borough.

**Theme A9.3: Proposed changes will negatively impact high streets and local businesses**

- 9.11 184 (7% of) respondents expressed this theme. Examples of specific concerns include:
- Reduced parking times will dissuade people from frequenting local businesses and decrease footfall on high streets.
  - Businesses will close or be forced to move out of Camden.

*Officer Response*

- 9.12 As mentioned above, many areas of Camden are well connected to public transport, including the borough's high streets. Furthermore, it should be noted that several studies were undertaken around parking provision, whereby the importance of pedestrians and cyclists in the economic vitality of high streets and business centres has been repeatedly proven. Data from the Sustrans Walking and Cycling Index revealed that in 2021, cycling and walking contributed to an economic benefit of £36.5 billion for the UK. Moreover, in 2019, local businesses across the UK experienced an estimated £1.7 billion boost from individuals utilizing the National Cycle Network for tourism and leisure activities.<sup>15</sup> The creation of enhanced public spaces that promote active travel has been demonstrated to encourage people to spend more time on local high streets and in town centres. A 2018 study underscores this point by indicating that improved walking and cycling infrastructure in urban environments can lead to an increase in local retail spending by up to 30%.<sup>16</sup> Studies have also shown that shoppers arriving by other modes of travel spend

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<sup>15</sup> Sustrans, (2022). Helping people through the cost of living crisis and growing our economy. HYPERLINK "<https://www.sustrans.org.uk/media/11397/cost-of-living-report.pdf#page=25&zoom=100,0,0>" <https://www.sustrans.org.uk/media/11397/cost-of-living-report.pdf#page=25&zoom=100,0,0>

<sup>16</sup> Carmona, M, Gabrieli T., et al, (2018). Street appeal: The value of street improvements. <https://content.tfl.gov.uk/street-appeal.pdf>



more than those who arrive by car. Specifically, research published by TfL found that people who walk take twice as many trips to the high street and spend up to 40% more than those who drive.<sup>17</sup> Studies in Bristol and Waltham Forest find that businesses overestimate the number of customers that arrive by car and underestimate how many arrive by foot.<sup>18</sup> This is underscored by findings in the Mayor of London's High Streets for All report, which concluded that high streets are local, walkable destinations for most Londoners, and that over 90% of high street visitors use sustainable methods of transport to visit their high streets, the majority of which are walked trips.<sup>19</sup> This is similar to Camden-specific data, where across the borough, over 90% of shopping trips are undertaken by walking, cycling or public transport. Additional studies find that traffic calming measures in town centres did not negatively impact small businesses or reduce visitor numbers.<sup>20</sup>

9.13 In the first three years after the CTS was introduced, various efforts have been made or are in progress to meet Objective 1 to transform our streets and places to enable an increase in walking and cycling. These include installing 170 cycle hanger units, 24 km of segregated cycle lanes and 17 continuous footways. More details can be found [here](#). It is the aim of the Council to continue in these efforts to encourage walking, cycling and public transport use as alternatives to motor vehicle use, including for trips to businesses and high streets.

## 10.0 STAKEHOLDER COMMENTS AND OFFICER RESPONSES ON THE PROPOSED CHANGES TO MERGING PAID FOR PARKING TARIFF AREAS 1 AND 2

10.1 937 comments were received regarding merging Paid for Parking areas 1 and 2, the least number of responses across all proposed changes. The full list of themes is shown below in figure 10. The largest share of respondents felt neutral about the proposed changes (349 respondents) and an additional 105 respondents felt the merge was reasonable and simplified paid for parking rates in Camden. The next most common theme is addressed below, and all themes are addressed in Annex C.

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<sup>17</sup> Transport for London. Walking and Cycling: the economic benefits. <https://content.tfl.gov.uk/walking-cycling-economic-benefits-summary-pack.pdf>

<sup>18</sup> Just Economics and Living Streets. The Pedestrian Pound: The business case for better streets and places. <https://www.justeconomics.co.uk/education-employment-and-economic-development/the-pedestrian-pound#:~:text=This%20research%20report%20presents%20evidence,consumer's%20perceptions%20of%20high%20streets.>

<sup>19</sup> Mayor of London, (2017). High Streets for All. <https://www.lse.ac.uk/cities/publications/research-reports/High-Streets-for-All>

<sup>20</sup> Just Economics and Living Streets. The Pedestrian Pound: The business case for better streets and places. <https://www.justeconomics.co.uk/education-employment-and-economic-development/the-pedestrian-pound#:~:text=This%20research%20report%20presents%20evidence,consumer's%20perceptions%20of%20high%20streets.>

### Merging Paid for Parking Themes with Number of Responses

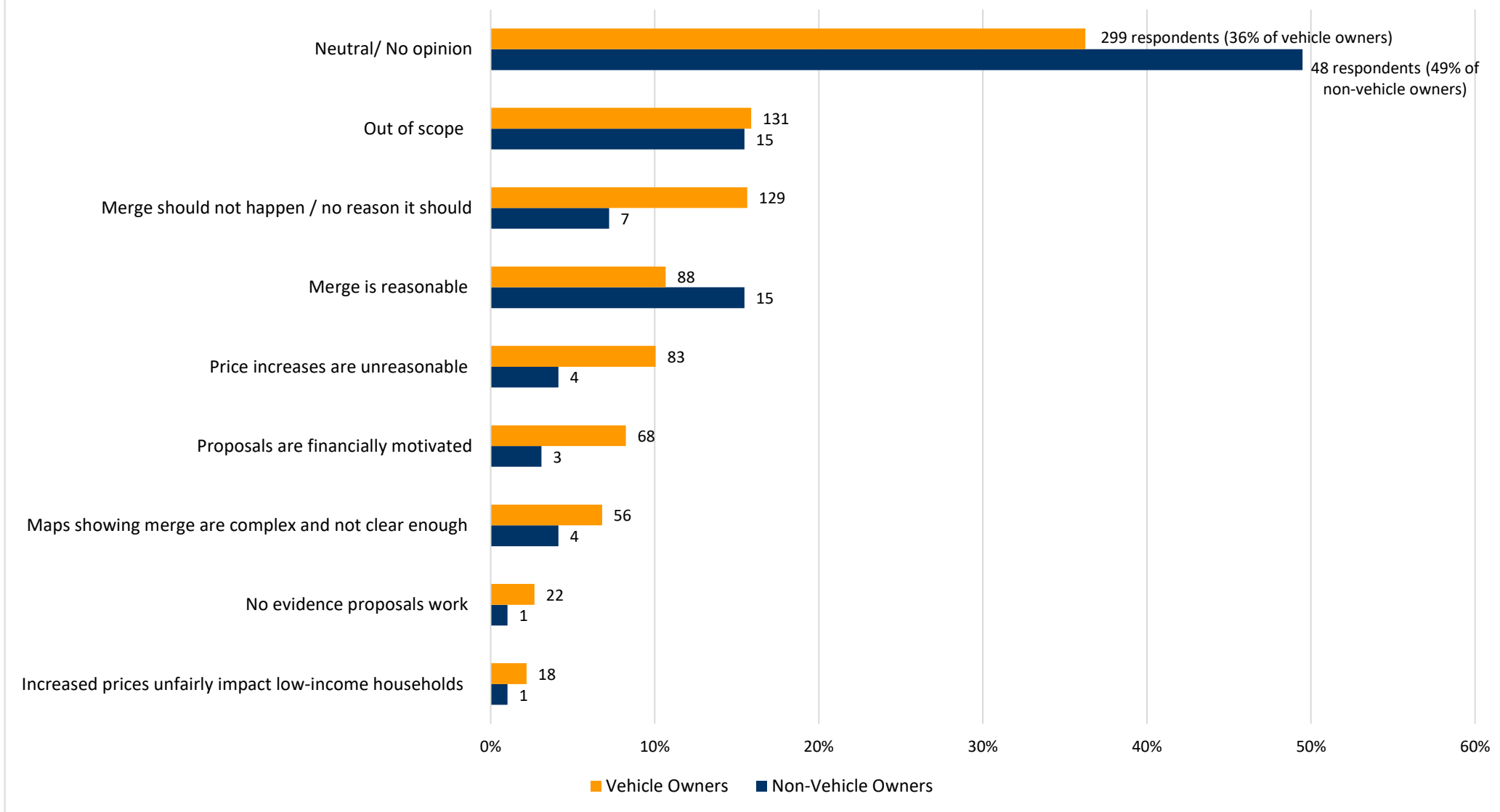


Figure 10 - All themes among merging paid for parking responses

## Theme A10.1: No reason for the merge to happen

136 respondents (or 5%) expressed this theme. Specific concerns included:

- The current parking tariff system works well, there is no reason to change something that is not broken.
- The objectives of this merge are unclear and its role in achieving Camden's environmental goals is not explained.

### *Officer Response*

10.2 A study commissioned by Camden in 2019 (and updated in 2022) to assess the appropriateness of the controlled parking zone (CPZ) hours of control across the borough has shown that maintaining the current Tariff area 1 with a lower charge is not appropriate. The study 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. The merge is intended to ensure current Tariff areas and prices accurately reflect the levels of congestion, traffic and environmental impacts and encourage more sustainable modes of transport over private vehicle use.

### 11.0 STAKEHOLDER COMMENTS AND OFFICER RESPONSES ON THE PROPOSED CHANGES TO MOTORCYCLE PERMITS

11.1 1,140 comments were received regarding Motorcycle permits. This includes email responses from three motorcycle interest organisations (Save London Motorcycling, British Motorcyclists Federation and Motorcycle Action Group). All of the themes are shown in figure 11 below and addressed in Annex C, with the most common themes addressed in more detail in the following sections.

### Motorcycle Permit Themes with Number of Responses

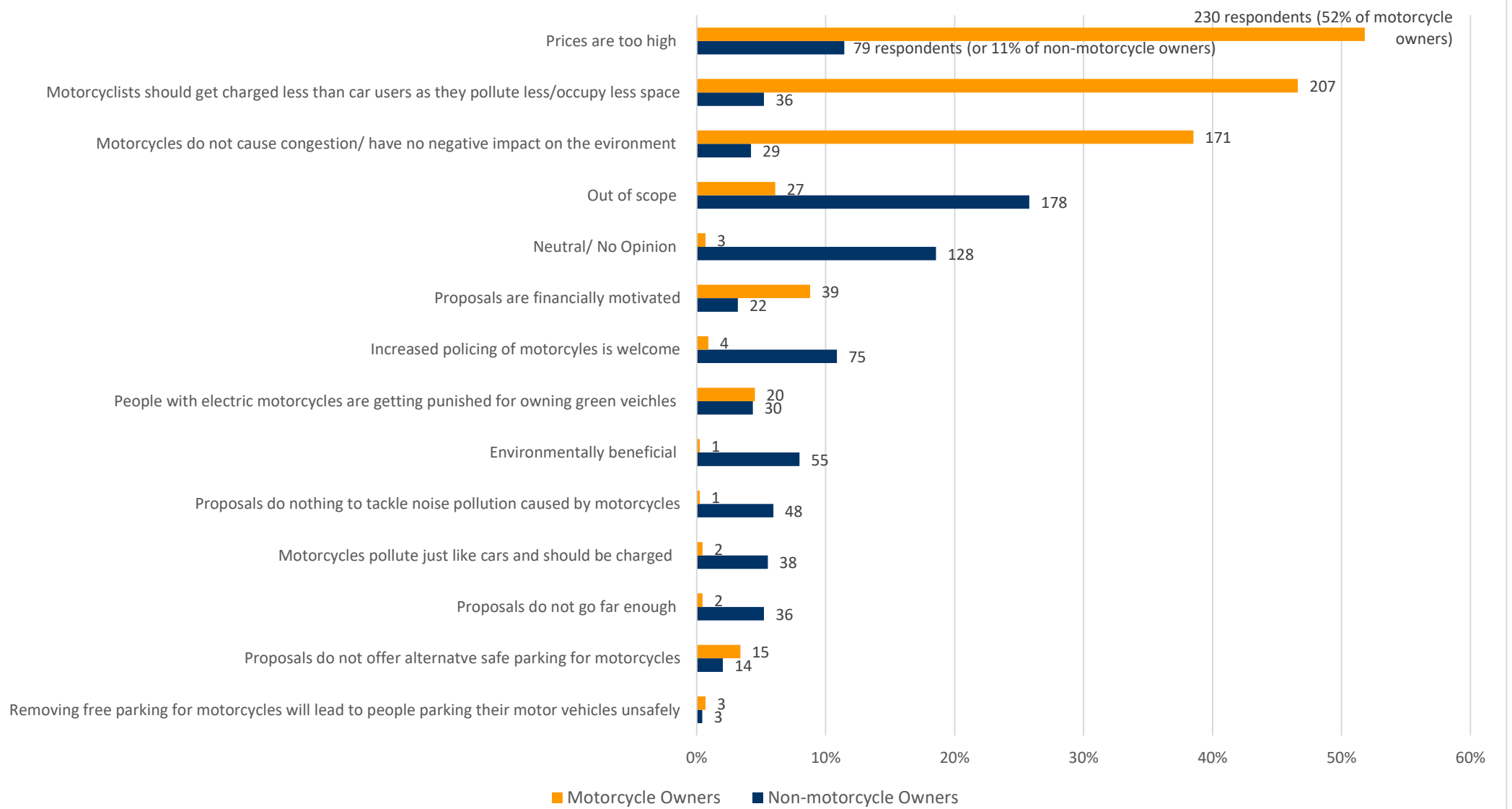


Figure 11 - All themes among Motorcycle permit responses

## Theme A11.1: Prices are too high

- 11.2 309 respondents (or 11%) expressed this sentiment, including all 3 of the motorcycle groups mentioned above. Examples of specific concerns include:
- Permit prices are not considerate of people's essential use of motorcycles.
  - Motorcycles will cease to be an affordable mode of travel for low-income households.
  - Prices are higher than neighbouring boroughs.

### *Officer Response*

- 11.3 With respect to the first two sentiments expressed above, these comments are noted. However, it is difficult to justify charging non-electric motorcycles lower charges than is proposed, because they contribute to carbon emissions and while some may fall under the under 75 g/km carbon emissions band, some emit more emissions than this. Data from the [UK Department for Transport](#) and motorcycle manufacturers shows that for the top 10 most common motorcycles registered in the UK in 2022, the average CO2 emissions are 72 g/km. Two of the 10 most common motorcycles had emissions of 110 g/km. This supports the proposal to charge non-EV motorcycles the same as other motor vehicles in the lowest band of emissions, which may even be conservative in some cases given the above. Furthermore, it should be noted that motorcycles are not subject to the Air Quality Surcharge and in areas where motorcycles do park perpendicular to the road, such as solo motorcycle bays, they would pay less than other motor vehicles.
- 11.4 The proposed level of charging is also aimed at ensuring that it is not cheaper to park a motorcycle on the public highway than it is to park a bicycle (for those who park in bike hangars) thus reflecting our commitment to incentivise the uptake of more sustainable modes of travel, like cycling.
- 11.5 It should be noted that following the consultation, proposals have been adjusted to reduce the majority of electric motorcycle permits by 46%.
- 11.6 It is also important to note that the proposed charges for motorcycles under Resident permits are £146.30 for non-electric motorcycles and £74.70 for electric motorcycles. This equates to 40.1 pence and 20.5 pence, daily respectively, to park in an inner London borough, where there is high demand for kerbside space. In 2021/22, 230 motorcycle Resident permits were issued, which provides an estimate for the number of residents who would be impacted by increased Resident permit prices for motorcycles. For Business permits, the proposed price is £419.1 for non-electric motorcycles and £214.1 for electric motorcycles, or £1.15 and 58.7 pence daily. For solo motorcycle bay parking, we are proposing a daily charge of £1.33 for electric motorcycles and £2.60 for non-electric motorcycles. In comparison, hourly charges for private car parks are typically greater than this amount.

- 11.7 Also, as a result of feedback received during the consultation, it is proposed that the fees and charges are phased in over two financial years which halves the equivalent daily rates set out in point 11.6 during the first financial year for all but motorcycle Resident permits.
- 11.8 Additionally, electric motorcycle permit prices are now proposed at 46% lower than that of electric cars/vans because electric motorcycles 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. The amended proposals for electric motorcycles
- 11.9 While proposed prices may be higher than some neighbouring boroughs, these are within the context of Camden having one of the most ambitious Transport Strategies in London – including ambitious targets around mode shift and motor vehicle volume reductions - and Camden’s intention to be at the forefront of committing to address air quality and the climate crisis, including the commitment to meeting revised WHO air quality guidelines. Camden was also the first council in the country to have a Citizen’s Assembly on the Climate Emergency.

**Theme A11.2: Motorcyclists should get charged significantly less than car users as they pollute less and/or occupy less space**

- 11.10 243 respondents (or 8%) expressed this sentiment, including all 3 of the motorcycle interest group. Specific concerns were centred around the following points:
- Motorcycles occupy less space than cars, helping reduce road congestion and using less kerbside space.
  - Motorcycles have much lower CO2 emissions compared to cars, making the price increases for motorcycle permits counterintuitive.
  - The impacts of electric motorcycles are different / less than those of electric cars and hence should not be charged the same
  - Camden Council should encourage the adoption of motorcycles/powered two-wheelers to reduce private car usage, rather than discouraging it.

*Officer Response*

- 11.11 With regards to concerns that motorcycles take up less space, particularly kerbside space, this has been considered. In paid for parking, permit holder, resident, doctor and business bays, the council does not design these based on individual motor vehicle size. We provide a parking bay size (5 meters) that would accommodate all vehicle types that could be used for that function. Thus, based purely on vehicle size, it would not matter, for example, whether the Business permit holder has a motorcycle or a small van, it would still be assigned a kerbside length of 5 meters. Where the distinction is made (in solo motorcycle bays), the daily price for parking in solo motorcycle bays is proposed

to be set at £1.33 for electric motorcycles and £2.60 for non–electric motorcycles. The equivalent of this for a car or van is £43.31.

11.12 Regarding the carbon emissions of motorcycles, the fact that they generally have lower carbon emissions than cars has been considered which is why it is proposed that they are in the lowest carbon emission charging band for motor vehicles. Additionally, as set out above, following the public consultation, the permit prices of electric motorcycles are now proposed at 46% less than those of electric cars.

11.13 While Camden does recognise the potential benefits of motorcycles with respect to the fact that they are generally lower carbon emission vehicles, this is done in the context of when there is an essential need for motor vehicle use. Setting the charges for motorcycles in the lowest motor vehicle charging bands is aimed at encouraging those with an essential need for a motor vehicle to consider their use over that of higher emitting vehicles. When motor vehicle use is not essential, we seek to encourage the use of more sustainable modes of travel – walking, cycling and public transport – as represented by the road user hierarchy in the CTS.

### **Responses from Motorcycle Interest Groups**

11.14 In addition to the sentiments detailed above, the three motorcycle organisations expressed specific concern for motorcycle owners living in car-free housing, who would need to pay visitor motorcycle parking rates. Two of the organisations emphasised the following:

- That there are some who moved in car free developments expecting to own and park a motorcycle in Camden’s free solo motorcycle bays;
- The introduction of the charges risks a number of negative outcomes for those in car free developments including homelessness, relocation and poverty;
- That electric motorcycles have environmental benefits; and
- Concerns that most motorcycle use is for essential trips, such as for commuting, when public transport is not available and when heavy loads are being transported.

### *Officer Response*

11.15 The purpose of car-free developments is to reduce traffic congestion and pollution and encourage more sustainable modes of travel. These objectives are the same as those that have informed these proposals around motorcycle charges. The council notes that those living in car-free developments may now need to pay for motorcycle parking (because of charges for solo motorcycle bays). However, within the context of objectives set out in this report, it is difficult to justify continued free and discounted motorcycle parking for all motorcycle owners, including those in car-free housing.

11.16 In relation to occupants of car free developments having moved in expecting free solo motorcycle parking, it should be noted that Section 45 of the Road

Traffic Regulation Act 1984 allows highway authorities to change how they facilitate parking and movement of motor vehicles in the areas under their control. It is therefore not unusual for aspects that are free to be charged for. A number of boroughs are still in the process of introducing controlled parking zones and in many instances, this results in drivers needing to pay to park when they previously did not. For example, Islington Council recently introduced charges for motorcycle parking and Hackney recently introduced charges in its Zone B. Additionally, several boroughs regularly review their parking fees and charges to ensure that they are set at appropriate levels.

- 11.17 The comments on the impacts of the proposals on car free development occupants are noted however as set out earlier, it is difficult to justify maintaining free parking and discounted parking for resident permits. However, following the consultation, the proposed price for most electric motorcycle permits has been reduced by around 46% and it is proposed to implement any price increases over a period of 2 years. A wider Cost of Living Support package (beyond transport measures) is also available, as set out [here](#).
- 11.18 With respect to electric motorcycles being environmentally beneficial, within the Council's transport and wider environmental policy context the current provision of free parking for electric motorcycles in the borough is being considered alongside their contribution to non-exhaust emissions and that they are not an active mode of travel. Parking charges are proposed for them to discourage inessential use / ownership in the context of these issues. The council, however, in recognising that their emissions are lower than electric cars, has adjusted the proposals so prices for electric motorcycles are now proposed at 46% less than electric cars/vans for the majority of parking products.
- 11.19 Finally, it should be noted that Camden has some of the highest PTAL (and shared transport) levels and is well connected to the rest of London, which suggests that some motorcycle trips, including those for commuting, can be made by public transport instead. The Council notes that some journeys may be essential and where this is the case, the Council has set out these proposed changes in order to encourage a transition to lower emission motorcycles.
- 12.0 STAKEHOLDER COMMENTS AND OFFICER RESPONSES ON THE PROPOSED CHANGES TO DOCTOR PERMITS
- 12.1 916 comments were received regarding changes to Doctor permits, including two emails from Primrose Hill Surgery and Prince of Wales Medical Centre and a survey response from Abbey Medical Centre. All the themes are shown below in Figure 12 and addressed in Annex C, with the most common ones addressed in the following sections.

### **Responses from Practices**

- 12.2 Two practices submitted email responses to the consultation and another practice submitted a survey response. Two practices were concerned with their ability to conduct home visits under the proposed changes. One practice felt



that removing the dedicated parking would impact their ability to recruit new staff. One of the three practices expressed concerns about the proposed permit cost and its impact on their business' viability.

### Doctor Permit Themes with Number of Responses

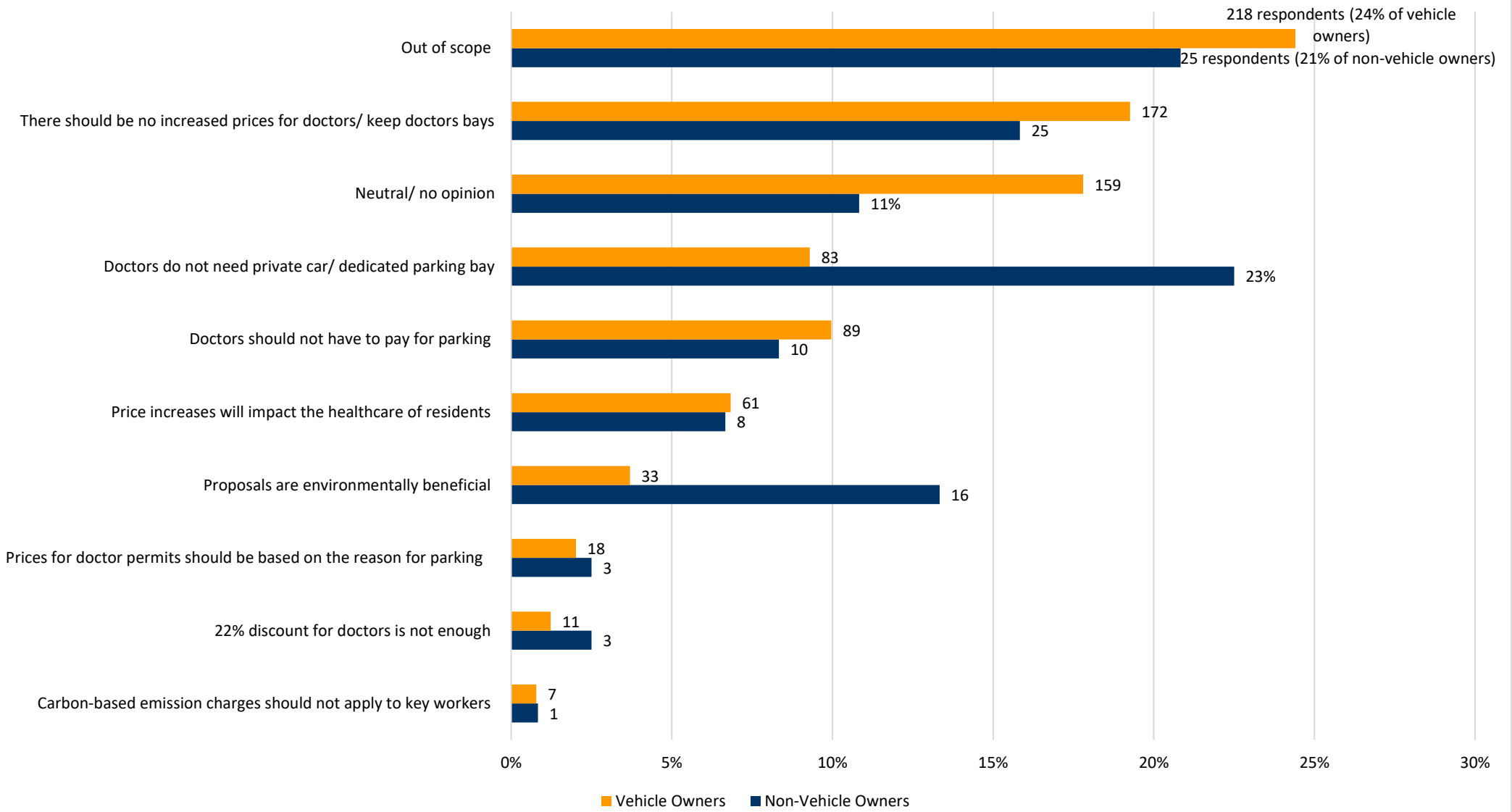


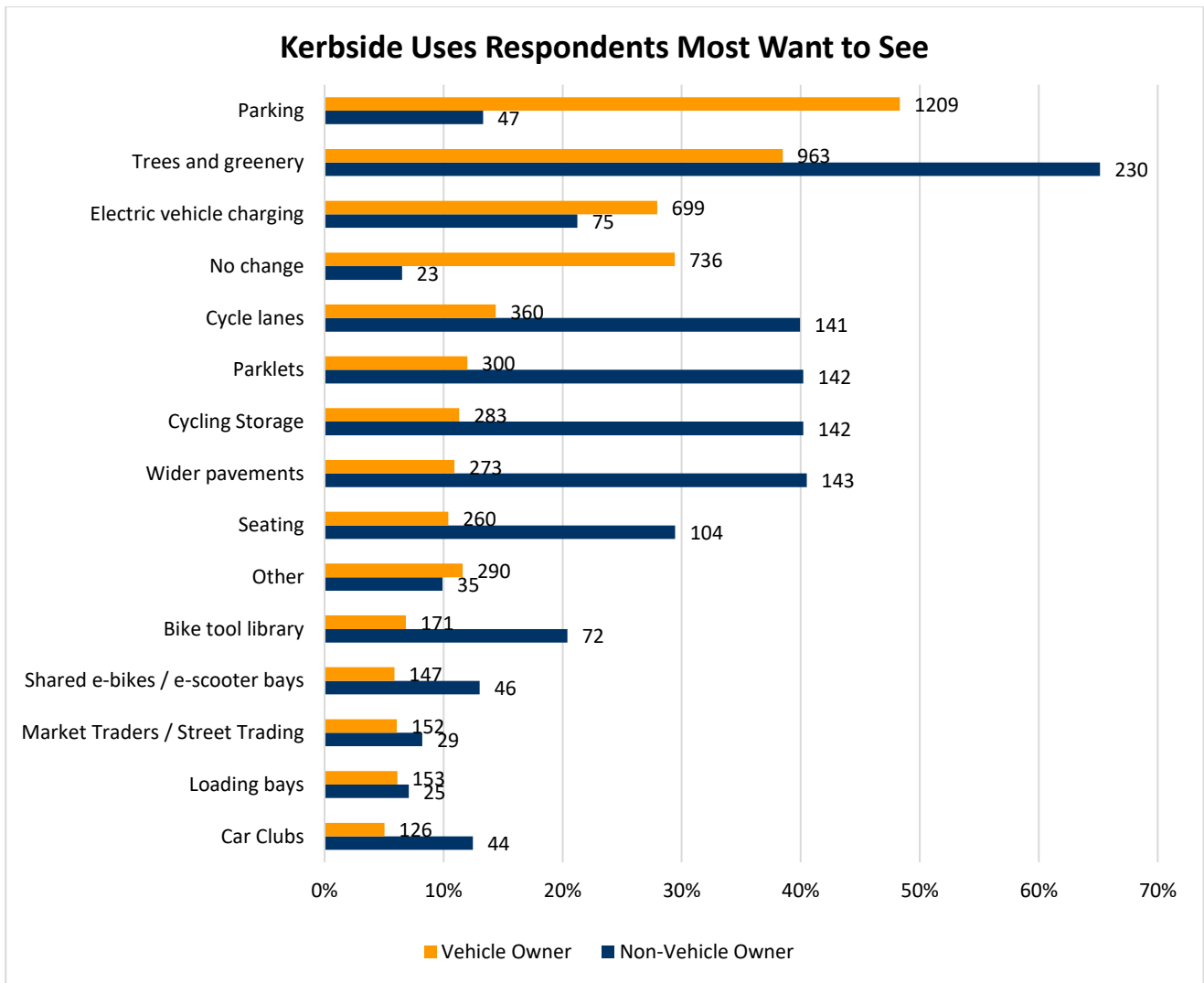
Figure 12 - All themes among doctor permit responses

## **Theme A12.1: Do not increase prices or change/remove Doctor Bays**

- 12.3 197 (or 7% of) respondents expressed this theme. Specific concerns included:
- Increasing prices for essential workers adds unnecessary financial stress.
  - Healthcare workers are already suffering from pay cuts, making the increase of prices unreasonable.
  - Camden should support healthcare workers rather than burden them.

### *Officer Response*

- 12.4 Under the proposed structure, Doctor permits for EVs would be less than their current price and Doctor permits for the lowest emission band would be the same price. Our proposed approach aligns with goals set out by the NHS around health, air quality and climate change. Specifically, the NHS has acknowledged its role in combatting air pollution and climate change in their [Net Zero travel and transport strategy 2023](#), calculating that its current fleet contributes to 36,000 deaths a year from air pollution. Furthermore, in the strategy, the NHS underscores that those who live close to busy roads (who are often of lower socioeconomic status) are exposed to higher levels of air pollution and stresses that reducing emissions from travel will improve air quality and related health harms.
- 12.5 In response to some practices stating that they had concerns about their ability to visit patients if dedicated bays were removed, the proposals have been amended so that dedicated parking bays for Doctor permits are no longer provided for new applicants. Doctor bays currently in place will be reviewed on a case-by-case basis in response to concerns raised by some surgeries during the consultation. This proposal accommodates practices who need to keep their dedicated bays for essential operational reasons while rationalising existing provision if no longer required.
- 13.0 STAKEHOLDER COMMENTS ON SUGGESTED KERBSIDE USE
- 13.1 Respondents were asked to provide feedback on how they would like to see future kerbside space used. From a list provided, respondents could indicate which items they would most like to see implemented from a scale 1 (do not want to see) to 5 (would really like to see). 998 comments were received regarding suggested uses for kerbside space in Camden.
- 13.2 The three uses that respondents most wanted to see were parking, trees and greenery and EV charging. Figure 13 shows the kerbside uses and the number of respondents who ranked them as a 5 (would really like to see):



*Figure 13 - Kerbside uses respondents most wanted to see.*

13.3 Respondents were also able to provide written responses on future uses of kerbside space. Among these written comments, respondents expressed the most interest in providing more space for motor vehicles, which is likely a reflection of the high number of car/motorcycle-owning respondents. Respondents also requested less cluttered and wider pavements. The third most popular theme was more space for cyclists, including cycle lanes, parking and storage. All of the themes expressed with the number of responses is shown in figure 14 below.

### Kerbside Uses with Number of Responses

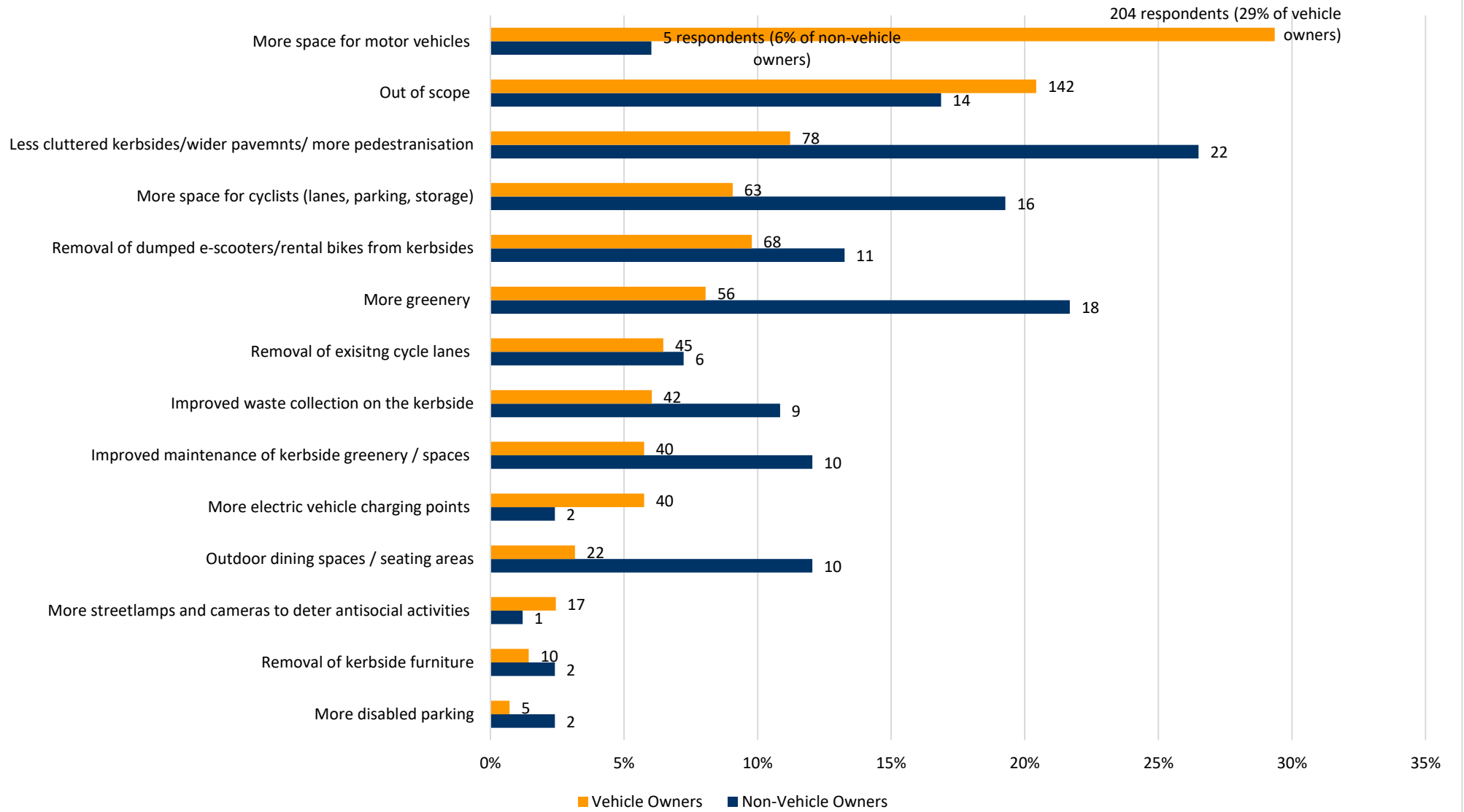


Figure 14 - Kerbside uses respondents requested in open response question

- 13.4 Taken together, it is evident that the greatest number of respondents were interested in more parking space for motorists. This is unsurprising given the disproportionately high percentage of car/motorcycle owners among respondents compared to car owners amongst Camden's population as a whole. Next to that, greenery and cycle infrastructure were the most requested changes. Finally, respondents felt pavements were at times too cluttered, specifically requesting better management of dockless shared e-bikes/e-scooters and waste management.

#### *Officer Responses*

- 13.5 The council has noted the comments around future kerbside uses. The recommendations for kerbside uses will be considered and explored in the context of the Camden policies to encourage the use of sustainable and active travel, promote healthy streets and tackle climate change.
- 13.6 It is noted that providing more parking spaces is inconsistent with the adopted policies set out in the CTS which specifically seeks to remove parking spaces in order, where necessary, to facilitate sustainable transport modes. As part of the CTS consultation in 2018, over 60% of Camden residents responding to the consultation agreed or strongly agreed with the principle of reallocating road and kerbside space away from motor vehicles in favour of sustainable modes of travel, while overall disagreement was just over 27%.
- 14.0 STAKEHOLDER COMMENTS AND OFFICER RESPONSES ON PROPOSED COST OF LIVING SUPPORT
- 14.1 Respondents were asked to provide feedback on the proposed cost of living support as well as suggestions for how the council could encourage lower emission vehicles or more sustainable types of travel.
- 14.2 1,288 comments were received. There were very few comments on the proposed cost of living support but several suggestions for additional support. These are shown in full in figure 15 below but included:
- 174 respondents (or 6%) suggested enhanced support for EV uptake, including expansion of charge points.
  - 172 respondents (or 6%) requested more incentives and/or infrastructure for sustainable modes of transport, specifically highlighting the need for safer, dedicated cycling lanes and storage.
  - 157 respondents (or 5%) suggested improvements to public transport, including the frequency and reliability of buses and the cost of public transport generally.

### Cost of Living Support Themes and Number of Responses

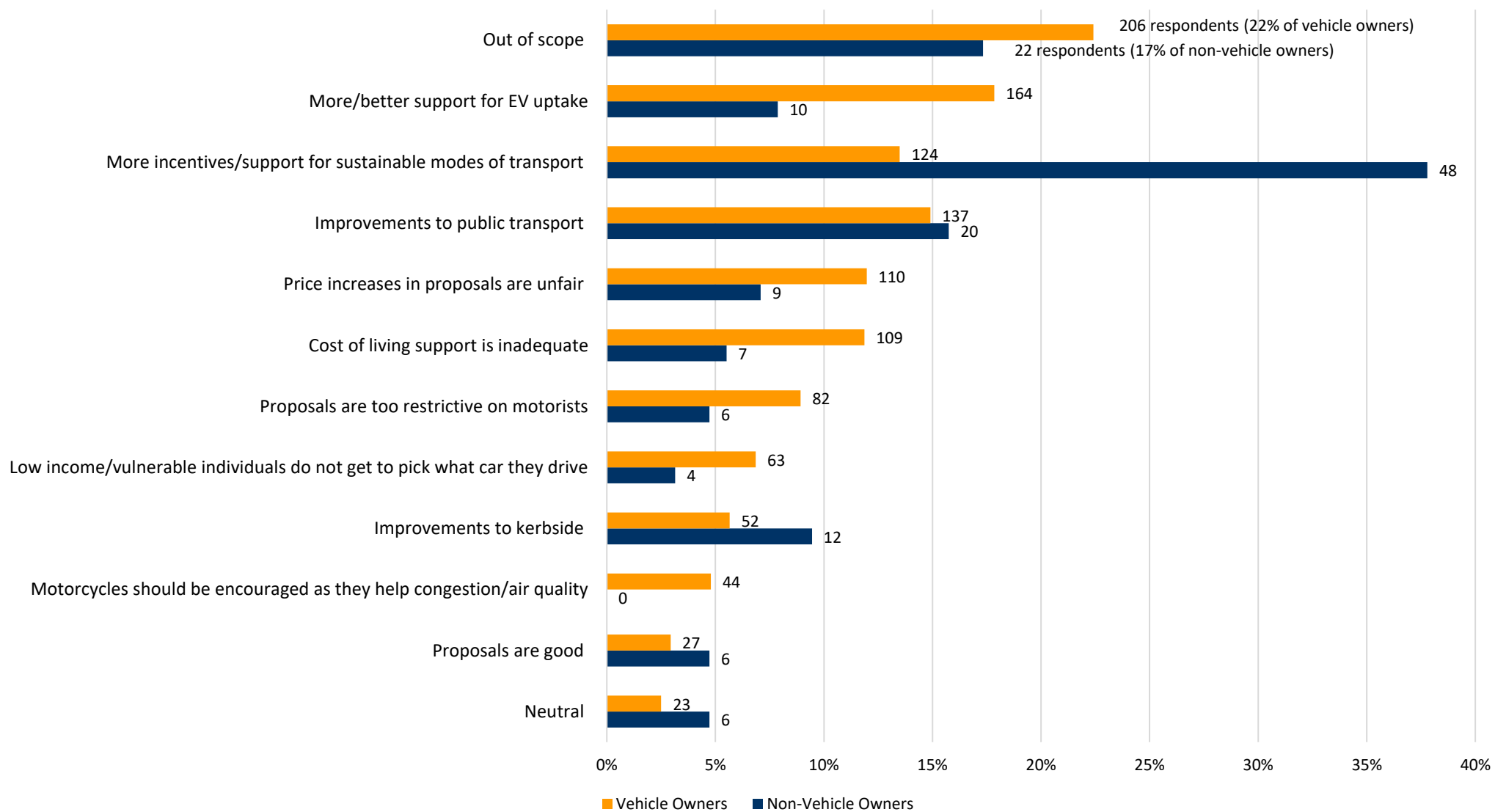
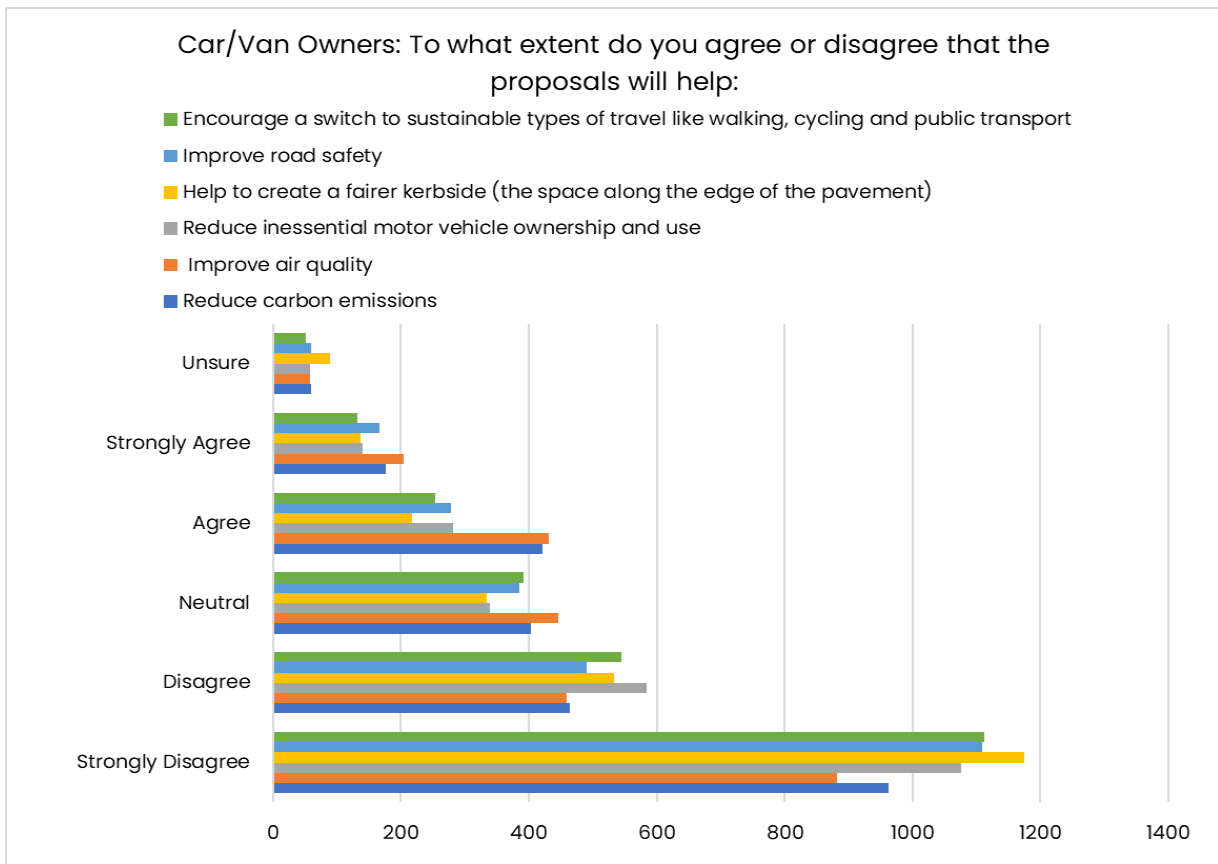


Figure 15 - Themes for cost of living support among respondents

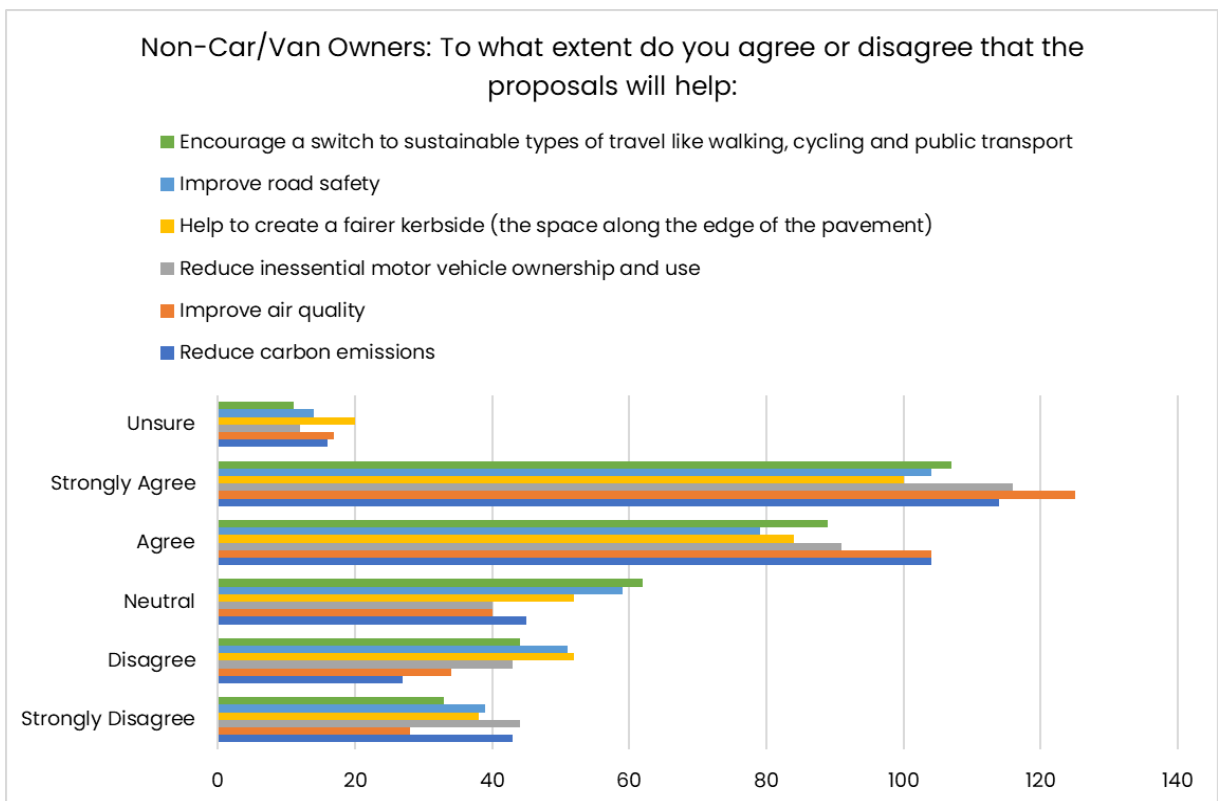
## *Officer Response*

- 14.3 The council recognises that more investment in EV and cycling infrastructure is important. The council is already committed to accelerating the roll out of bicycle hangers throughout the borough and expanding dedicated cycle lanes, as part of a £4 million capital investment programme in 2024/25. As part of the [Camden Climate Investment](#), the council has raised money to invest in 80 more electric vehicle charging points. From funding awarded by the UK government's Local Electric Vehicle Infrastructure Fund, Camden will install a minimum of 160 fast, standalone charge points, expected to be delivered by mid to late 2025. Additionally, funding from the On-Street Residential Chargepoint Scheme, Camden's Climate Investment Bonds, Transport Strategy Capital Funds and chargepoint supplier-matched funds will be used for the installation of 80 fast, standalone chargepoints and 70 hub model chargepoints. These actions are in alignment with the updated [Electric Vehicle Charging Point Action Plan](#), which sets out to install 240 fast charge points up to 2024/25 among other actions, to meet the needs of existing EV owners and encourage greater EV uptake in the next three years.
- 14.4 The council is also undertaking efforts to improve public transportation, such as expanding bus priority and bus gates. Details of our current programme of work can be found [here](#).
- 14.5 Finally, the council notes the comments that the proposed prices increases are higher than inflationary increases. As mentioned above, it is proposed that fee and charge increases are phased in over the course of two financial years.
- 15.0 **STAKEHOLDER COMMENTS ON THE PROPOSAL OBJECTIVES**
- 15.1 Respondents were asked to indicate to what extent they agreed that the set of proposals helped achieve the objectives set out by the council. The results of these responses among car and van owners are shown below in Figure 16 and among non-vehicle owners in Figure 17. The highest share of vehicle-owning respondents disagreed that the proposals helped achieve any of the intended outcomes. However, as noted above, the majority (almost 2/3) of Camden households do not own nor have access to a car / van. Among the non-vehicle owners who responded to our consultation, there was much more agreement that the proposals would meet our objectives than among vehicle owners.





*Figure 16 - To what extent did car/van owners agree or disagree about proposal meeting objectives*



*Figure 17 - To what extent did non-car/van owners agree or disagree about proposal meeting objectives*

## GENERAL COMMENTS FROM STAKEHOLDERS

- 15.2 Respondents were provided an open space to provide any other comments to the parking proposals and kerbside use. A total of 692 comments were received. 160 (or 6%) respondents expressed that prices were too high and another 101 (or 4%) felt there was no evidence the proposals would work. This is in line with the common themes expressed across the different permit types, for which officer responses are provided throughout the report. All the themes are shown below in figure 18.
- 15.3 Interestingly, the third most common theme was that the proposals did not go far enough, with 78 (or 3%) respondents expressing this theme. As set out in commitments in the Camden Transport Strategy, the council regularly reviews parking fees and charges to ensure they are contributing to policy objectives.

### General Comment Themes with Number of Responses

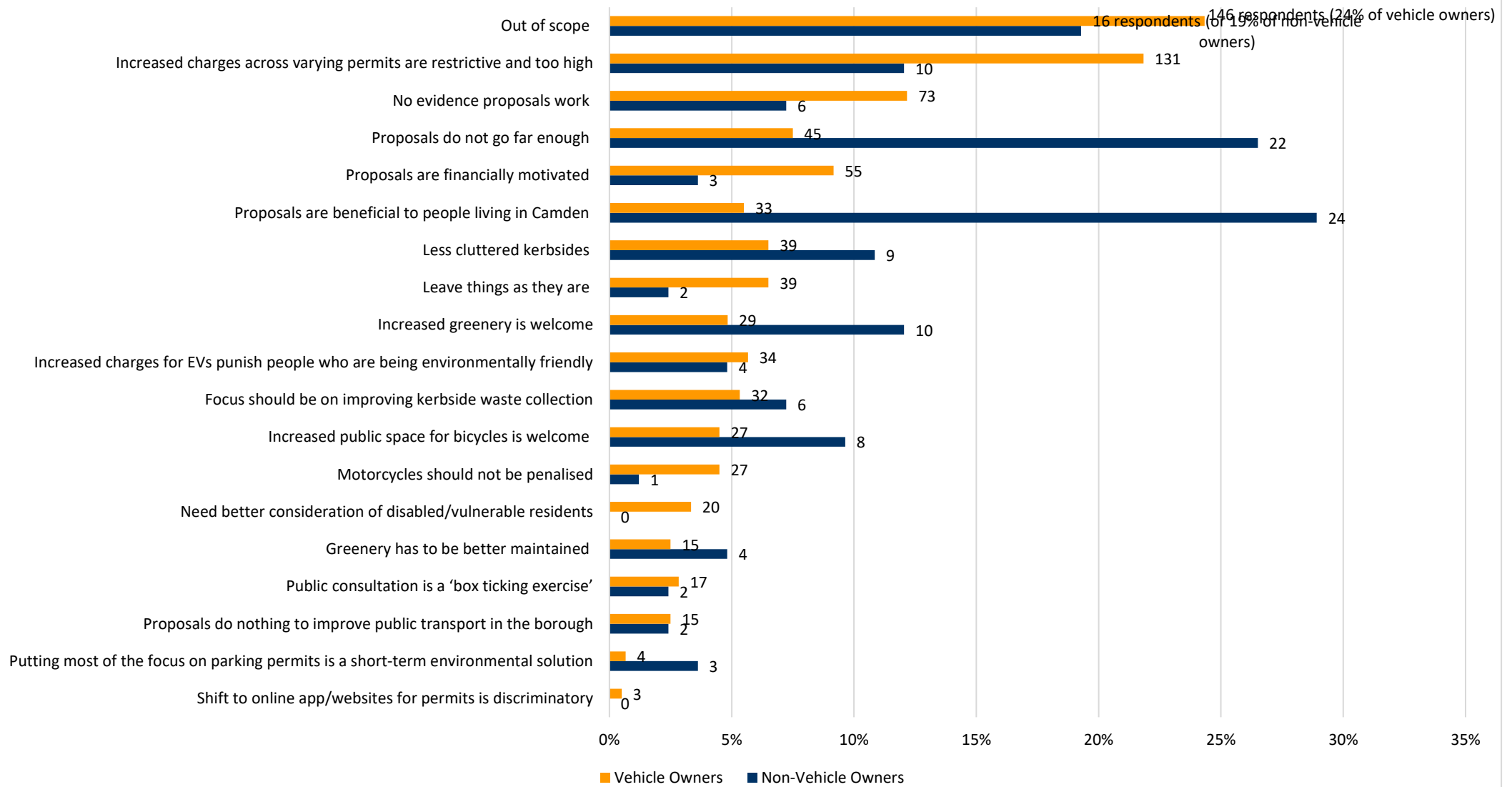


Figure 18 - All themes among the general comments from respondents

## 16.0 FEEDBACK FROM WEBINARS

- 16.1 Two webinars were held, which each included presentations on the proposals and time for a Q&A. The first webinar was held on 11 October 2023 and was attended by 40 people. The second webinar was held on 30 October 2023 and was attended by 17 people.
- 16.2 Based on the questions asked by attendees in both webinars, it was evident that a predominant concern was the removal of scratch cards, specifically how this would affect their existing provision of scratch cards and how older persons or those who are uncomfortable using technology would be impacted. It should be noted that existing provisions of scratch cards can still be used and will not expire. In response to the concerns brought up during the consultation, it is proposed, following the consultation, that scratch cards are retained for Assisted Customers. Furthermore, Camden would introduce an IVR telephone system to support customers who need out-of-hours access to telephone booking. Contact Camden will also still be available for customers to call. These concerns are addressed in detail above in section 8.6-8.7 and in the Equalities Impact Assessment in Appendix 2. The concerns around scratch cards were also expressed within the context of how it would affect tradespeople's ability to park when working on residents' homes. As mentioned above, it should be noted that tradespeople have their own dedicated permit type (Trade permits), which can be used to access parking throughout the borough. This permit type will be reviewed in a future consultation to ensure it better aligns with the needs of tradespeople and their customers and we will take this feedback into consideration during this future review. As answered during the webinar, residents are also able to purchase Visitor permits, either ahead of time or at the time of the visit.
- 16.3 Another major theme that came across from questions from both webinars was regarding the expected financial impact of the proposals, such as the forecasted revenue increases. During the webinars, Camden officers responded that a financial analysis would be provided when reports are published in line with final proposals. Projected resource implications can be found in section 7 of the main report. As noted during the webinars, financial impact is subject to multiple variables, such as the impact of proposals on vehicle ownership and use.
- 16.4 Multiple questions were asked about why the proposals were being made on top of existing London schemes, like ULEZ, and why vehicles that are ULEZ compliant may still be affected by price increases under these proposals. As answered during the webinar, TfL's aim with the ULEZ is to help improve air quality by reducing the number of vehicles in London that do not meet emissions standards. However, ULEZ is based primarily on emissions of local air pollutants (NOx and particulate matter (PM)) and does not take account of carbon dioxide (CO2) emissions, which part of these proposals seek to do. Additionally, the ULEZ does not differentiate between petrol vehicles registered after 2005 and diesel vehicles registered after 2015, even though some of these can be highly polluting. Carbon emissions-based permits allows the Council to

regulate levels of CO2 by charging a scaling pricing structure where the highest emitting pay a higher cost. The proposed Air Quality surcharge applies an additional fee for vehicle permits to enable the Council to better regulate emissions from older ULEZ-compliant vehicles may have higher NOx & PM emissions.

16.5 Comments were made suggesting that electric motorcycles should not be charged the same amount as electric cars. As detailed in section 2 of the main report and in section 11.8 above, the proposed price for electric motorcycles (for all products but solo motorcycle bay parking) has been reduced to be lower than that of electric cars/vans. Additional comments expressed that motorcycles take up less space than the average car. These concerns are addressed in section 11.12 above.

16.6 Table 3 below details the remaining concerns brought up during the webinars and the officer response.

*Table 3 - Additional webinar themes and officer responses*

Webinar Comment	Officer Response
One attendee expressed concern over price increases impacting their ability to transport business equipment.	Support offers will be provided for eligible businesses, including offers for car clubs and cargo bike rentals, which can help transport goods and equipment. Please see section 6.5 above for more details.
Respondents also expressed concerns about Camden having previously stated that they support motorcycle use and felt the proposals did not reflect this.	While Camden does recognise the potential benefits of motorcycles with respect to the fact that they are generally lower carbon emission vehicles, this is done in the context of when there is an essential need for motor vehicle use. More details available in section 11.13 above.
There were a few questions regarding the rationale behind restricting the number of vehicles per permit and whether this would apply to current permit holders.	This proposal is aimed at discouraging inessential car ownership and allowing 3 vehicles per permit does not support this aim. For those who currently have multiple vehicles on a permit, this proposal would take effect if in two years from their permit renewal date to allow time to make the change. It should be noted that any eligible resident within a household can apply for a parking permit therefore, for multiple occupancy households, residents can still apply for permits individually if the vehicle is registered to them.

<p>There were also several comments requesting that additional bicycle storage and EV charge points be installed.</p>	<p>Camden is committing to increasing the provision of both bicycle hangers and EV charge points. Please see section 14.3 above for more details.</p>
<p>A couple questions were asked about how Camden measures essential versus inessential car use and ownership.</p>	<p>As answered during the webinar, the Camden Transport Strategy contains a comprehensive evidence base report which contains significant levels of details, based on research by TfL, about currently driven trips which are "inessential" and could be switched to more sustainable forms of travel. This can be found at <a href="https://www.camden.gov.uk/transport-strategies-and-plans">https://www.camden.gov.uk/transport-strategies-and-plans</a></p>
<p>One question was asked about whether these proposals were already going forward.</p>	<p>At the time of the webinar, the consultation was live and the attendee was provided with the link to the questionnaire to provide feedback.</p>
<p>One question was asked whether it was Camden's position that lower income owners vehicles pollute less than the vehicles of higher income owners</p>	<p>The Council undertakes an equalities impact assessment in line with any decisions on policies or projects which impacts the public. As part of this it is important that reasonable adjustments are made to account for different needs and protected characteristics. The Council knows that the cost-of-living crisis is impacting residents so wants to make sure that there are measures in place to mitigate the increases for those who they would impact the post disproportionately. The potential impacts on low-income households are explored in detail in Appendix 2 Equalities Impact Assessment.</p>
<p>Two attendees asked about the data that supports that the proposed measures will meet their intended objectives.</p>	<p>As noted in section 5.14 of this report, for Resident permits, we have seen that almost 8 times more Resident permits are associated with electric vehicles in 2022/23, compared to 2018/19. During this same period, there was a 74% reduction in permit transactions for vehicles over 186 g/km of CO2 emissions. It is anticipated that similar patterns will be observed with the proposed increases.</p>

## Annex A – Respondent Demographic Graphics

Figure 1: Respondent Type

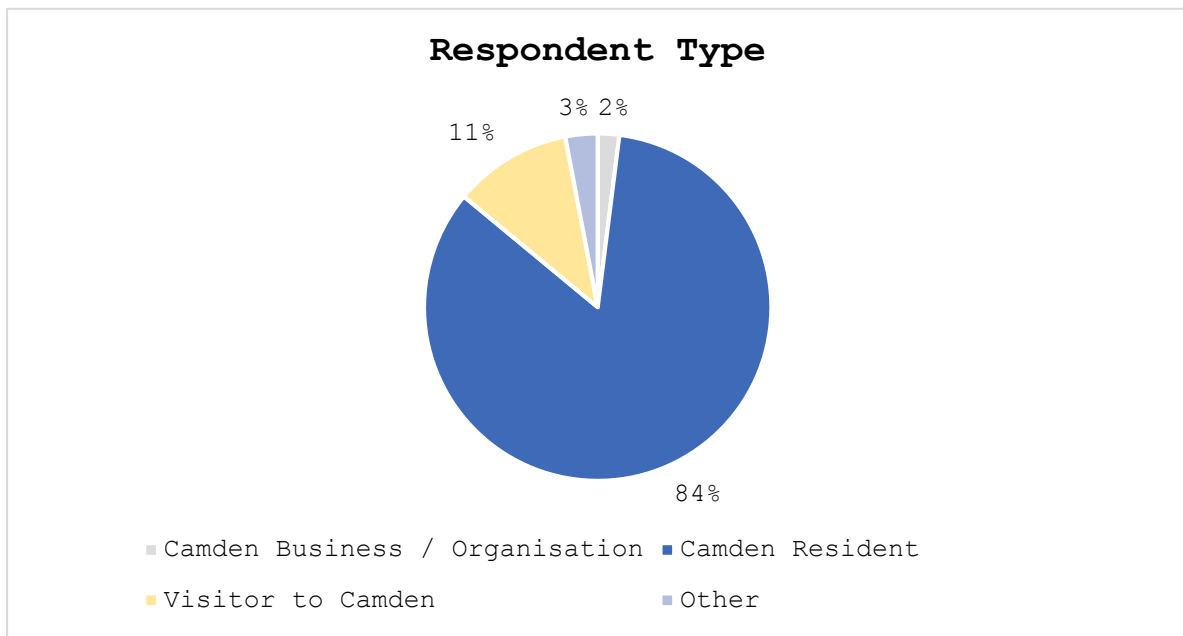


Figure 2: Gender

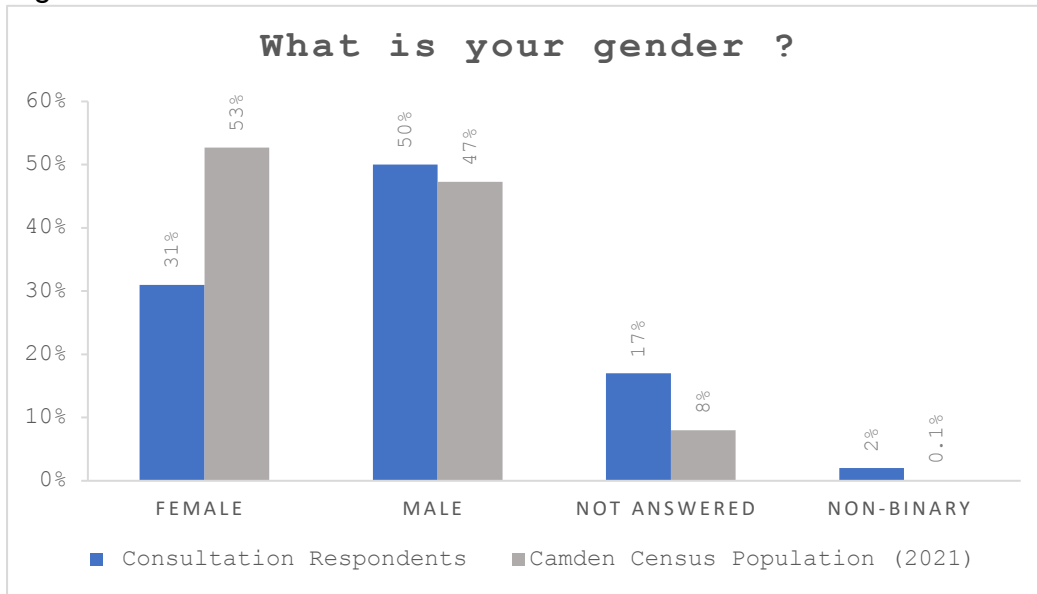


Figure 3: Sexual Orientation

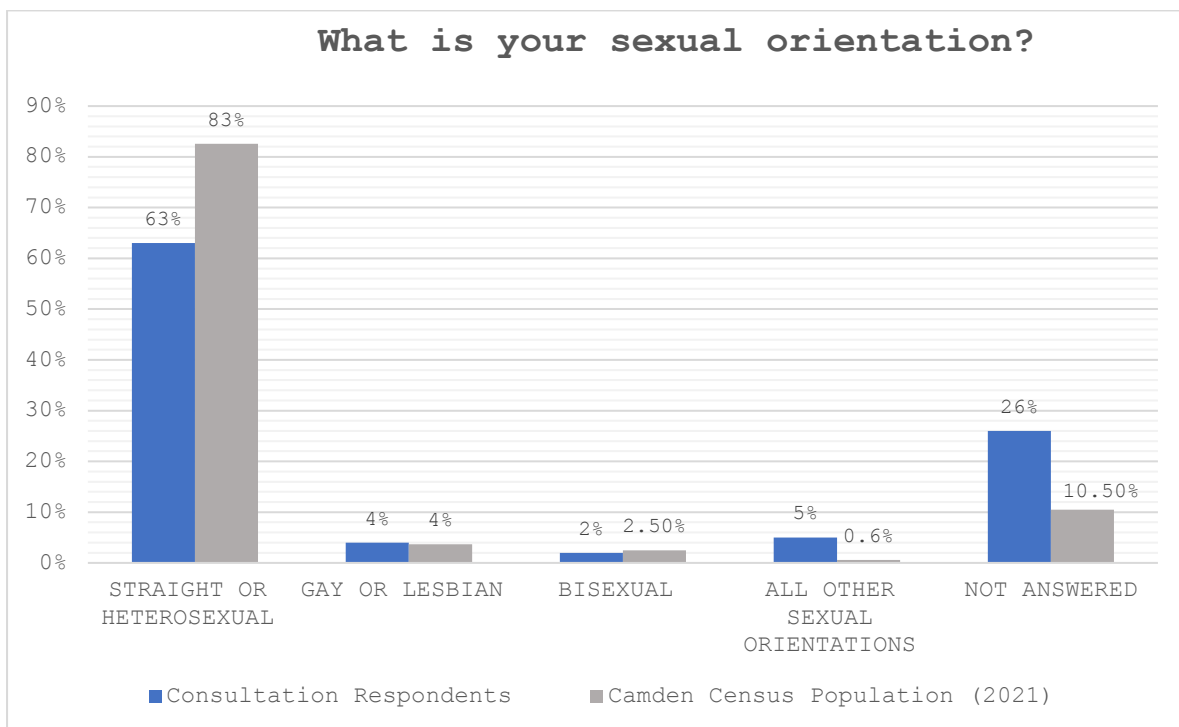


Figure 4: Disability



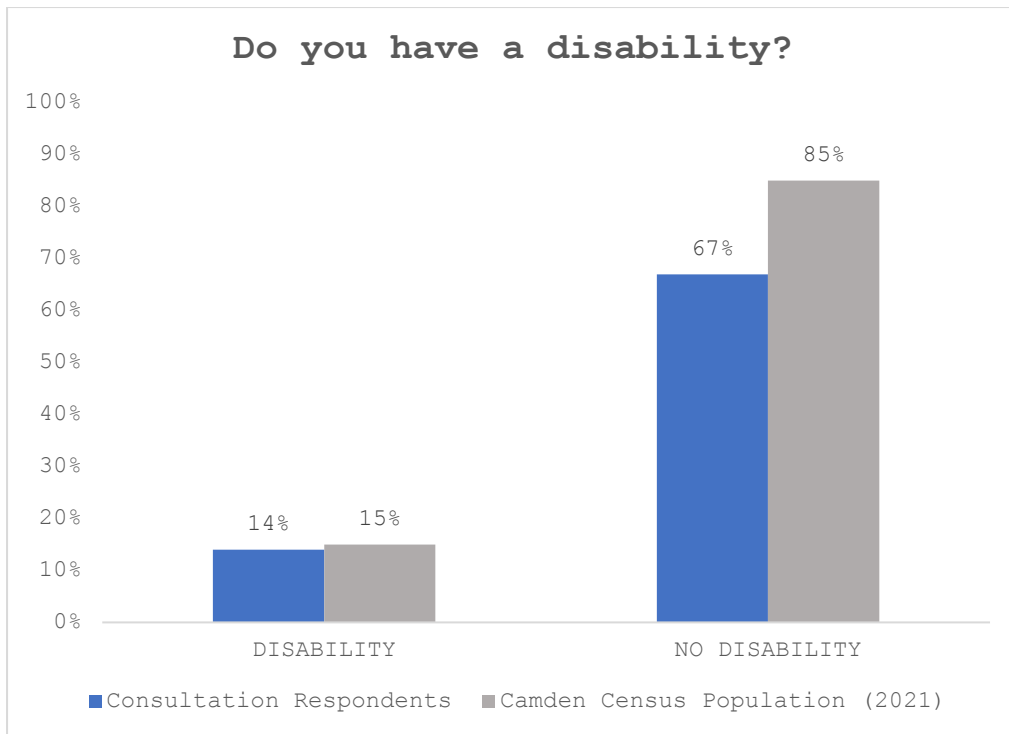


Figure 5: Religion

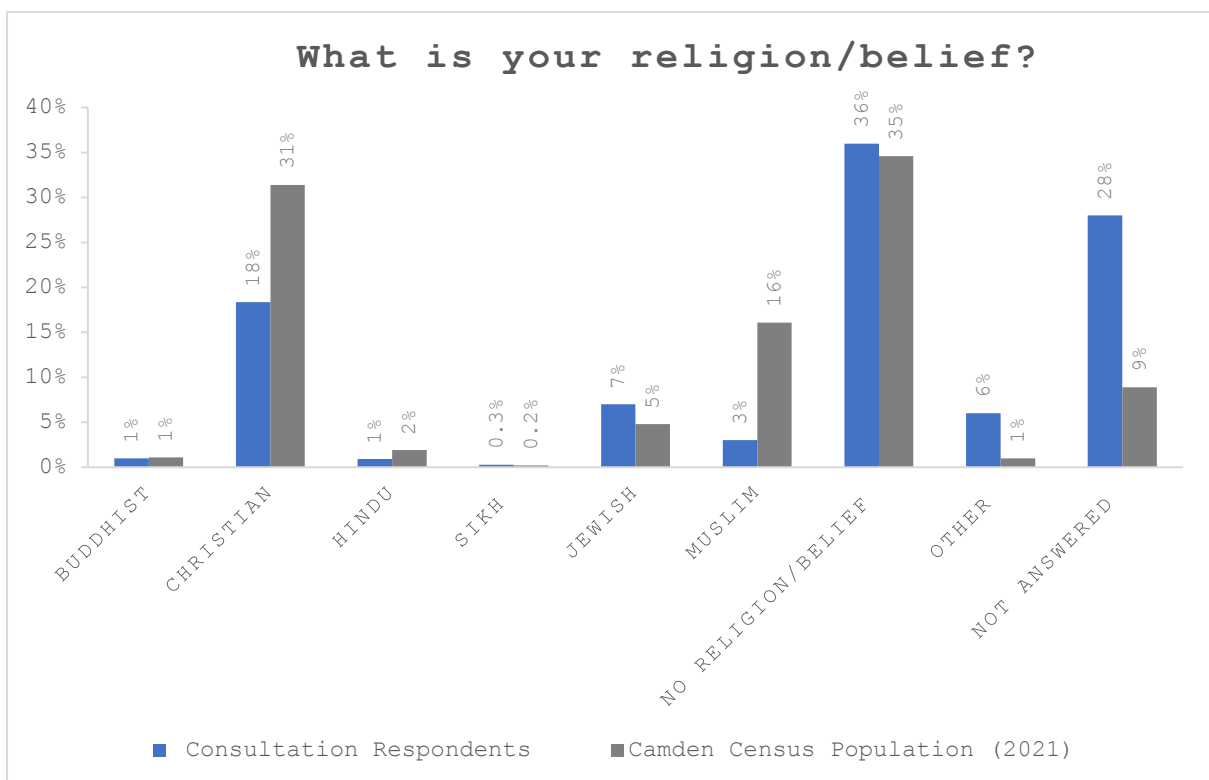


Figure 6 and 7: Pregnancy

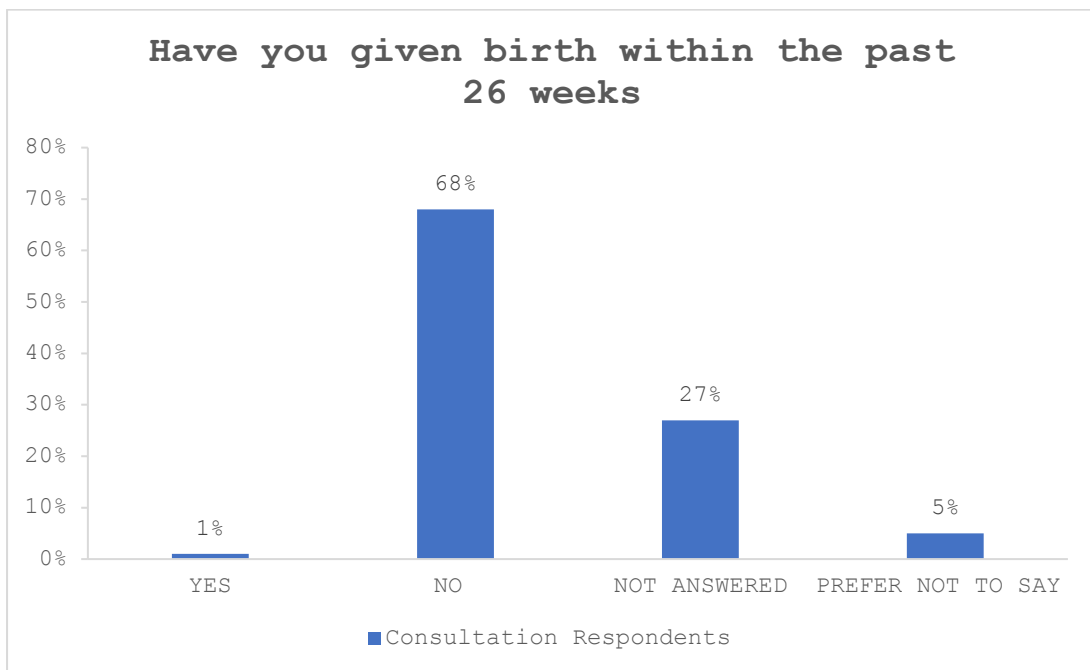
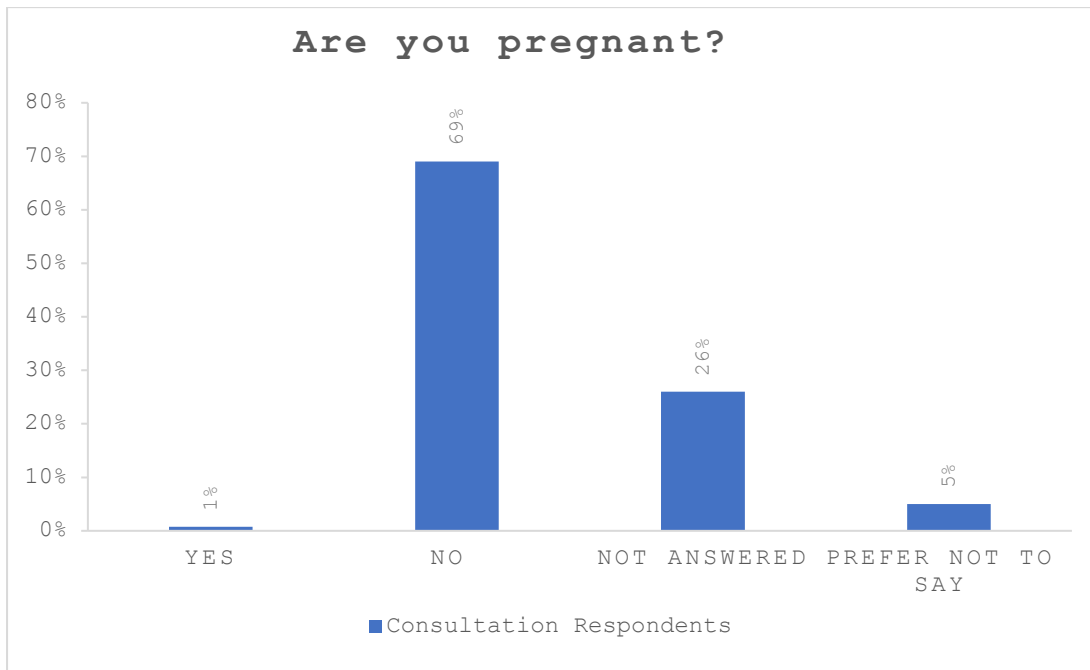


Figure 8: Parents/Guardians

### Do you have dependent(s) aged 16 or under?

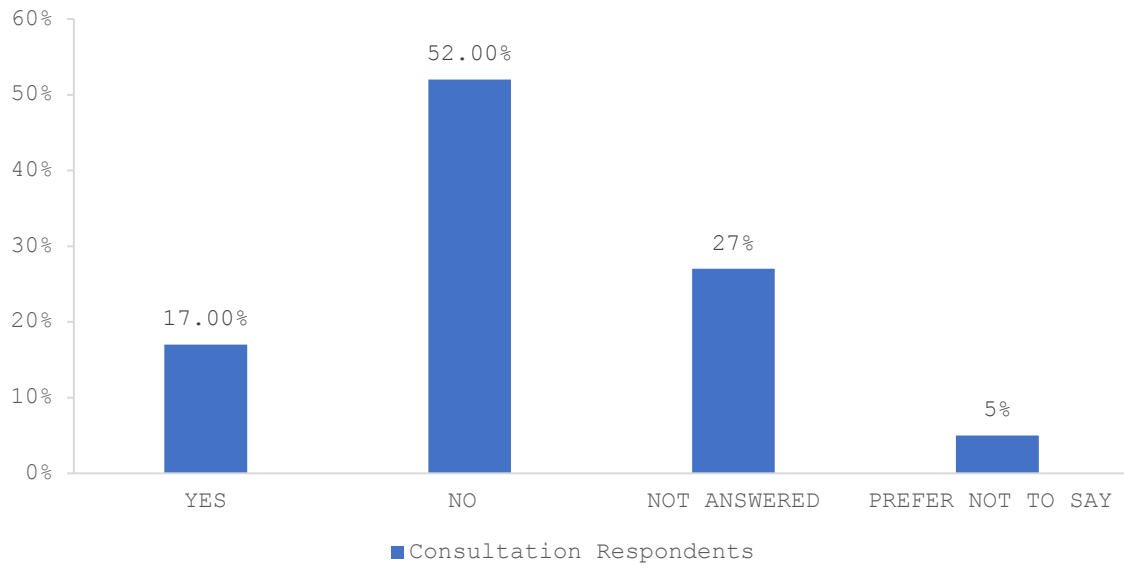


Figure 9: Ethnicity

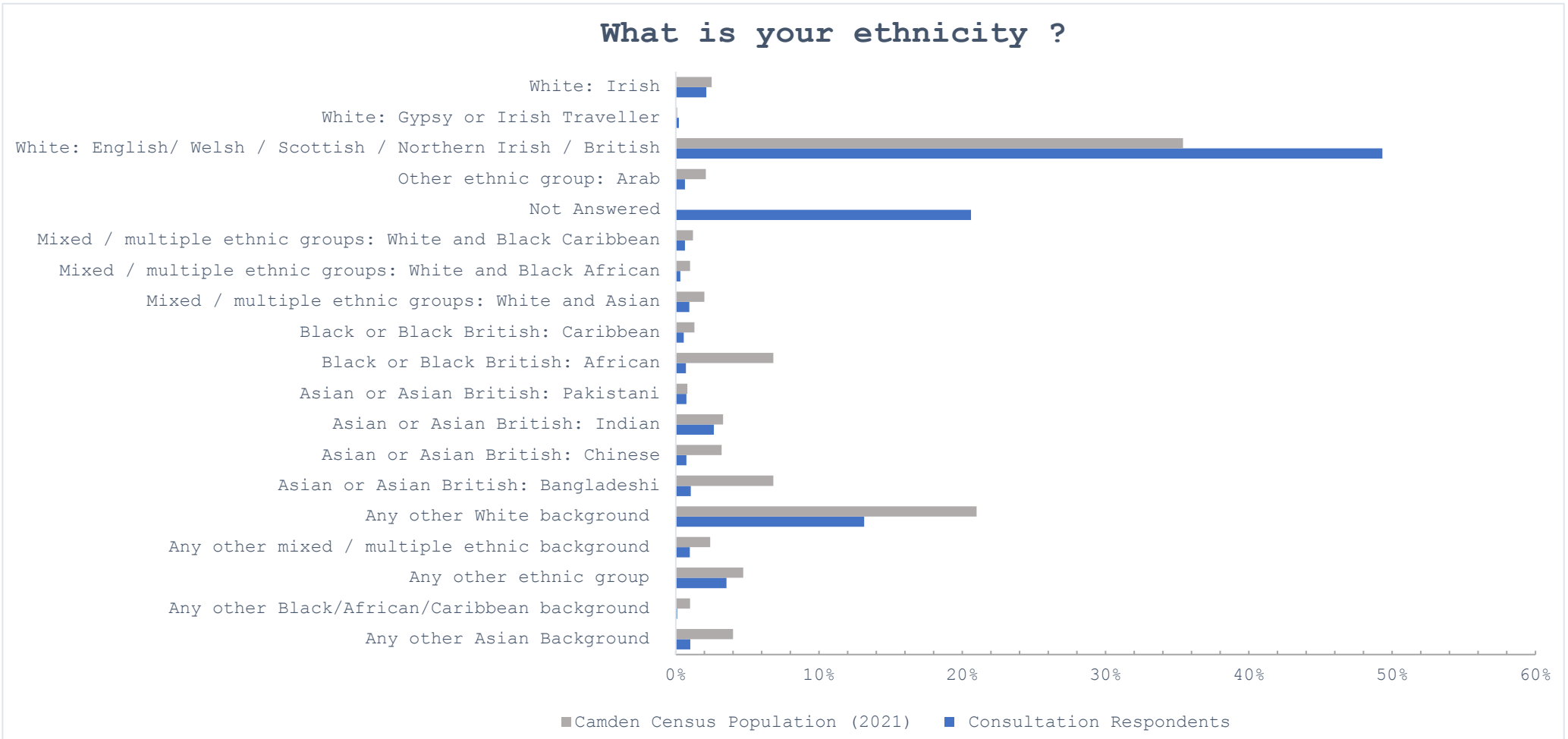
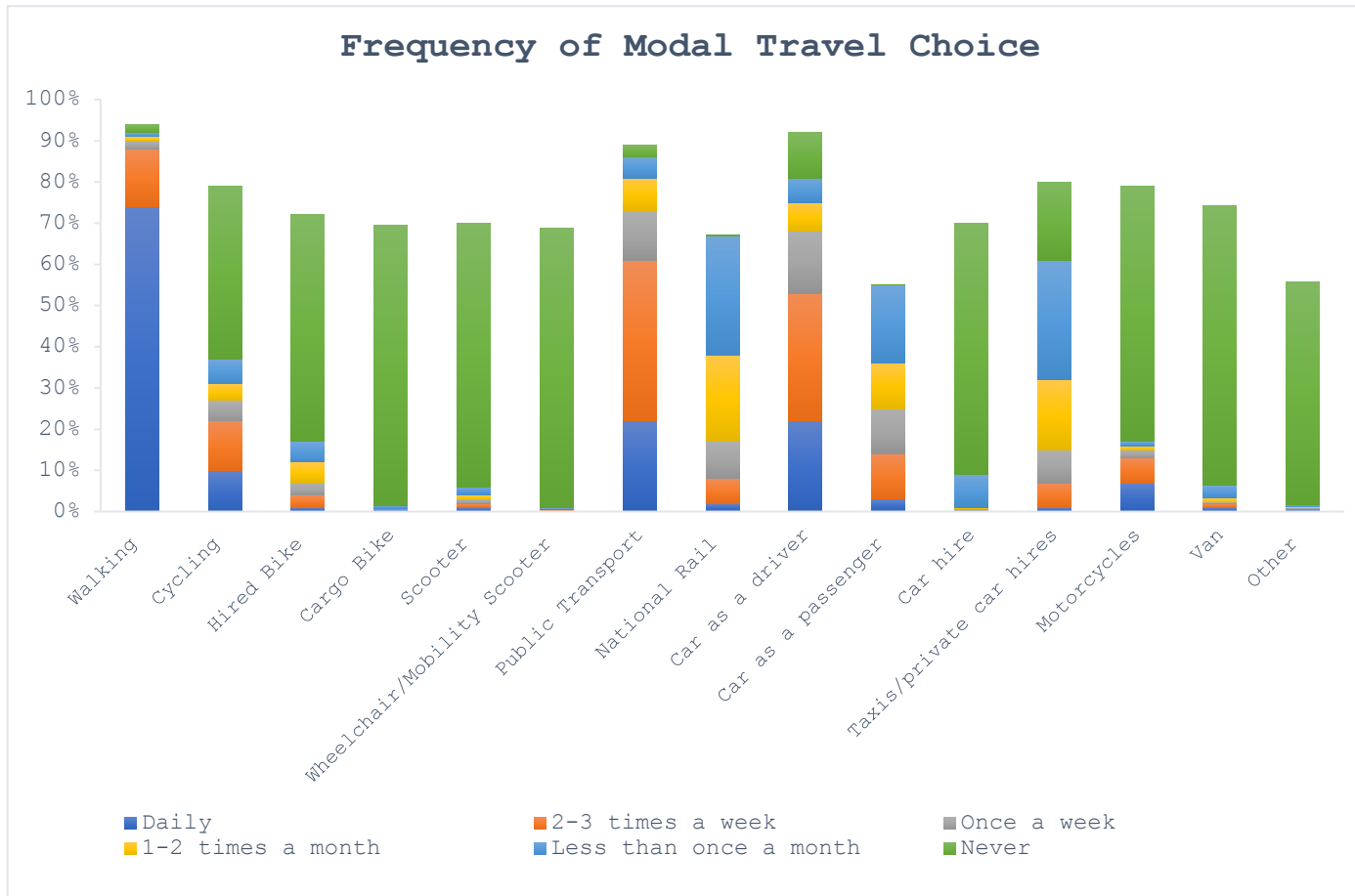


Figure 10: Modal Travel Choice – All Modes



**Annex B - Example of communications during consultation engagement**

Figure 1 – Example of postcard distributed at key underground and overground stations

## Healthy Streets, Healthy Travel: Cleaner, Fairer Parking

We are consulting, **until 5th November 2023**, on proposed changes to several of our parking fees and charges, changes to terms and conditions for parking, and how we use our limited kerbside space.

Whether or not you own a car, everyone is impacted by parking and how we use our road space. We'd like to hear from residents, businesses and visitors to the Borough about these proposals that aim to help deliver cleaner, healthier and safer streets.

### To find out more and respond to the consultation:

- Scan the below QR code
- Visit the consultation website:  
[camden.gov.uk/cleanerfairerparking](https://camden.gov.uk/cleanerfairerparking)
- For a paper copy or information in another language or format like large print call us on 020 7974 4444

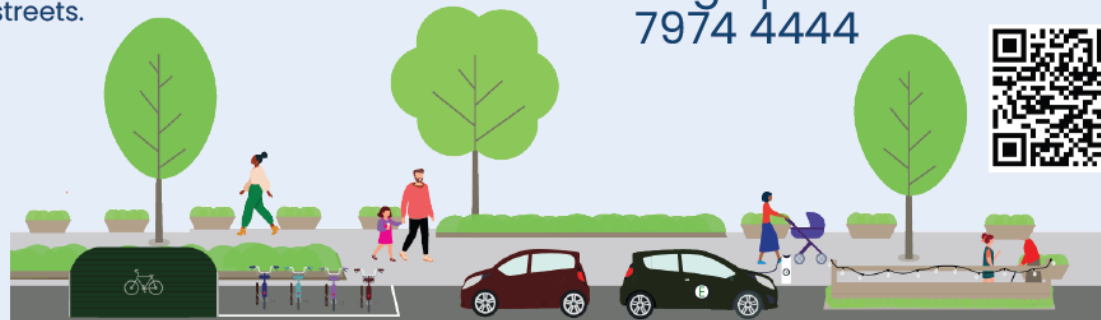


Figure 2 – Example of posters distributed throughout in 45 locations across the borough and at solo-motorcycle bays

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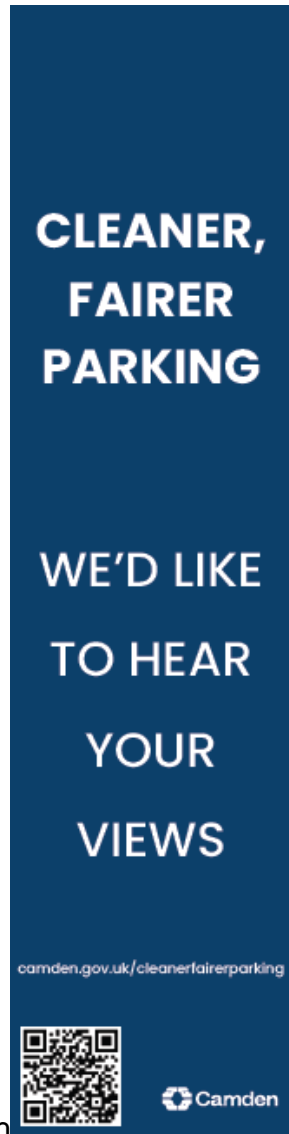


Figure 3 – Example of trifold wrapped around the base of lamp columns in 36 locations across the borough





Figure 4 – Example of email sent out permit holders and visitor permit users

Dear Permit Holder,

Camden Council is committed to reviewing parking fees and terms of use to create healthier streets, reduce harmful emissions and allow a fairer distribution of the kerbside (the space along the edge of the pavement) and we are now consulting on proposed changes to parking fees and terms of use. We are writing to you to ensure you are aware of the proposals and how you can provide feedback.

The proposals for changes to parking fees, charges, terms and conditions aim to discourage inessential use and ownership of motor vehicles. Where there is essential need, the proposals are aimed at encouraging the use of low emission vehicles. It is anticipated that the proposals, if approved, would help to reduce carbon emissions, improve road safety and air quality as well as increase levels of walking, cycling and public transport use.

Our records have indicated that you have a parking permit account in the London Borough of Camden, and therefore we are reaching out to ask you for your views on the proposals as part of the consultation. You can view the proposals using this [link](#) or on [www.camden.gov.uk/cleanerfairerparking](http://www.camden.gov.uk/cleanerfairerparking).

### **How do I feedback?**

To share your views on the proposals, **please fill out [the online consultation survey](#)**. For more details on the proposed changes to parking fees and terms of use, including FAQs and support available, please visit [our consultation website](#).

We will also hold 2 webinar sessions on **11 October 2023 6pm to 7pm** and **30 October 2023 6pm to 7pm** for anyone who would like to ask questions on the proposals. To find out how to attend please go to our [consultation website](#).

If you require a paper copy or other formats of the document including an easy read/large print version or a copy in a different language, please call us on 020 7974 4444 or email us at [CleanerFairerParking@camden.gov.uk](mailto:CleanerFairerParking@camden.gov.uk).

**The consultation will close on 5 November 2023.**

We look forward to receiving your response.

Cleaner Fairer Parking team

**Annex C – All Themes for Each Permit / Proposal with Officer Responses**

**Table 1 – Number of Responses by Parking Permit / Proposal**

<b>Parking Product</b>	<b>Number of Responses</b>
<b>Resident</b>	2,382
<b>Visitor Permits</b>	1,794
<b>Paid for Parking (Maximum Stay Reductions)</b>	1,483
<b>Car Club Permits</b>	1,168

<b>Motorcycle Permits</b>	1,140
<b>Business Permits</b>	1,002
<b>Paid for Parking (Merging Tariff Areas)</b>	937
<b>Doctor Permits</b>	916

### Resident Permits

Theme	# of Responses	Officer Response
Low-income households are disproportionately impacted by the increased permit prices	<b>282</b>	The council acknowledges that that the increased costs may impact some low-income households. Considering this, the council has decided to phase in the charges over two years. In addition, the council has identified and collated offers to support the shift to sustainable modes of transport and cleaner vehicles for which low-income households may be eligible. Please see Appendix 5 and Section 5 above for more information on these measures. It is also noted that (i) 2/3rds of Camden households do not own a car/van and (ii) the lowest income households in the Borough typically have lower car ownership than the highest income households. A full exploration of this issue is set out in the Equalities Impact Assessment in Appendix 2.
Cost of living crisis worsens the impact of the permit price increases	<b>181</b>	The council acknowledges that that the current cost of living crisis may worsen, for some households, the impact of the permit price increases. Considering this, a set of measures to alleviate the impact of these changes has been collated by offering support to transition to alternative modes of travel and/or cleaner vehicles, on top of these charges being phased in over two years. For more information on these measures, please refer to section 5 and

Theme	# of Responses	Officer Response
		Appendix 5: Cost of Living Support package. See above regarding “low income households”. A wider Cost of Living Support package (beyond transport measures) is also available, as set out <a href="#">here</a> .
Concerns on how revenue generated from increased permit prices is spent	<b>28</b>	The council publishes annual reports setting out how parking income is spent. There are statutory requirements about the spend of parking income. For the latest report and more information view <a href="#">here</a> .
The proposals are financially motivated and are centred on raising Council revenue.	<b>348</b>	The council has committed to reviewing parking fees and charges regularly as a means of delivering environmental, public health and transport objectives in local and regional adopted policies for example as set out in the <a href="#">Climate Action Plan</a> and <a href="#">Camden’s Transport Strategy</a> . These policy objectives are the sole reason for seeking to introduce the proposed changes.
Concerns that the proposals do not address the Council’s transport and climate objectives	<b>182</b>	As road transport accounts for 13% of carbon emissions, 31% of NOx, 20% of PM2.5 and motor vehicle use is not a form of active travel, it is anticipated that if the proposals are successful in encouraging a switch away from inessential motor vehicle use and ownership to walking, cycling and public transport use, then they will contribute to delivering the policy objectives found in in <a href="#">Camden’s Transport Strategy</a> , <a href="#">Clean Air Action Plan</a> , <a href="#">Climate Action Plan</a> , <a href="#">We Make Camden</a> , <a href="#">Joint Health and Wellbeing Strategy</a> and various London wide policies. If implemented, the impact of the proposals would be carefully monitored.
Concerns that the proposals do not address the efficiency of Camden’s public transport network	<b>201</b>	The council notes these concerns. However, improvements to the efficiency of the public transport network are out of scope of this review as they are not covered by parking fees and charges. Camden seeks to address the efficiency of the public transport network in other ways. For example, between 2019/20 and 2021/22, 1km of new bus lanes were added and 0.5km of existing bus lanes were upgraded to 24/7 operation.
The proposals will decrease congestion on Camden’s roads	<b>157</b>	The council notes respondents support of the proposals.
The proposals are environmentally beneficial	<b>218</b>	The council notes respondents support of the proposals.

Theme	# of Responses	Officer Response
Parking permits should be based on the size of your motor vehicle	<b>63</b>	<p>The council recognises comments regarding a size-based charge but is primarily focused on establishing reasonable and functioning emission-based charge for parking permits.</p> <p>In paid for parking, resident, doctor and business bays, the council does not design these based on individual motor vehicle size. We provide a parking bay size (5 meters) that would accommodate all vehicle types that could be used for that function.</p> <p>Notably, the council has decided to reduce Motorcycle permit charges for electric motorcycles in recognition that electric motorcycles have lower impacts on air quality than electric cars/vans.</p>
The proposals do not go far enough and more should be done in line with the suggested policies.	<b>114</b>	The council will continue to investigate further avenues and pathways that can be pursued to continue achieving Camden' transport and environmental goals in <a href="#">Camden's Transport Strategy</a> , <a href="#">Camden Climate Action Plan</a> and <a href="#">Clean Air Action Plan</a> . Furthermore, should these proposals be approved, the impact will be monitored, and such data will be used in further reviews in future years.
Despite the increased permit costs, the proposals are reasonable	<b>56</b>	The council notes respondents support of the proposals.

### Business Permits

Theme	# of Responses	Officer Response
Cost of living crisis worsens the impact of the permit price increases	<b>33</b>	The council acknowledges that that the current cost-of-living crisis may, for some organisations, potentially worsen the impact of the permit price increases in ways that are specific to businesses. Considering this, a set of measures to alleviate the impact of these changes has been put forward, on top of these charges being phased in over two years. For more information on these measures, please refer to section 5 and Appendix 5: Cost of Living Support package.

Theme	# of Responses	Officer Response
Low-income households will be impacted by the increased permit prices (as prices will be passed onto customers)	<b>8</b>	As noted above, Business permit prices have not been reviewed for some time in Camden and current prices are significantly lower than similar boroughs in London. We are not aware of any evidence that the higher permit prices in other boroughs have resulted in prices being passed onto customers. For households who are impacted by the cost of living crisis, there is a wider support package available (beyond transport measures), as set out <a href="#">here</a> . Finally, it should be noted that as part of the proposals, businesses will now be able to access a short stay (hourly) business permit, which they can use instead of purchasing an annual permit should their vehicle needs allow it. In addition, Camden will provide offers for car clubs to encourage businesses to use alternative options to vehicle ownership.
Policies are too restrictive for drivers	<b>138</b>	The comments relating to there being some essential businesses need for vehicles are noted however these have to be balanced with the policy goals set out in the Camden Transport Strategy, Clean Air Action Plan, Climate Action Plan, We Make Camden, Joint Health and Wellbeing Strategy, and various London and UK policies
Proposals do not consider different types of businesses and their needs	<b>74</b>	The concerns of the different impact of the Business permit proposals on individual businesses are noted. However, the council believes that the charges proposed are proportionate. It is difficult to justify maintaining the current charging approach of a flat rate for Business permits when we have committed to a net zero carbon Camden by 2030 under the <a href="#">Climate Action Plan</a> and adopted the revised <a href="#">WHO air quality standards</a> .
Price increases for EVs are higher than the current inflation rate	<b>18</b>	The concerns surrounding the cost of EVs for businesses being too high has been noted. However, EVs still contribute to air pollution and road safety concerns. They must be equally subjected to charges that reflect the stretching commitments the Council has made to transport, climate, air quality and health. However, to help mitigate against the price increases, all charges including those for EVs will be phased in over two financial years.
The proposals have an adverse impact on tradespeople	<b>40</b>	It should also be noted that tradespeople have their own dedicated permit type (Trade Permits), which can be used to access parking throughout the borough. This permit type will be reviewed in a future consultation to ensure it better aligns with the needs of tradespeople and their customers.
The proposals are reasonable in the context of	<b>105</b>	The council is committed to reviewing parking fees and charges regularly as a means of delivering environmental and transport objectives.

Theme	# of Responses	Officer Response
Camden's Transport Strategy		
Businesses may suffer temporarily, but the proposals are reasonable	<b>13</b>	The council is aware of the impact of the proposals on businesses and remains committed to supporting businesses through scrappage schemes and available subsidies. In addition, the proposed charges will be phased in over a two-year period.
Businesses should be subject to the same permit restrictions as residents	<b>8</b>	The council notes respondents support of the proposals.
Improved monitoring of business vehicles is welcome	<b>35</b>	The council notes respondents support of the proposals.

### Car Club Permits:

Theme	# of Responses	Officer Response
Car Clubs are not readily available to be an alternative to private car ownership	<b>116</b>	<p>With regards to the point that car clubs are not readily available to be a suitable to alternative to private car ownership, it should be noted that a study by CoMoUK found that in 2022, on average, each car club vehicle took 22 private cars off the streets in the UK.<sup>21</sup></p> <p>Camden currently has nearly 250 cars available to rent through Zipcar and Enterprise Car Club. As set out in the CTS, the Council supports the uptake of car clubs and is committed to the back-to-base car club</p>

<sup>21</sup> CoMoUK, (June 2023). Annual Car Club Research Report 2022 - United Kingdom. <https://www.como.org.uk/shared-cars/overview-and-benefits#car-club-annual-reports>



Theme	# of Responses	Officer Response
		model. We will continue to work with operators to identify new locations for car clubs and support the uptake through offers for residents and businesses, like free memberships.
Low-income households are disproportionately impacted by the increased permit prices (as prices will be passed onto car club customers or low-income households cannot afford to use car clubs)	<b>13</b>	The Council currently offers two-year free car club membership if they give up their Resident permit. The Council will expand its support offers to increase subsidies for car club use to provide free memberships and driving credits subject to availability. Camden also offers a range of support to help people use alternative modes of transport, such as walking, cycling, and public transportation. For more information on these measures, please refer to section 5 and Appendix 5: Cost of Living Support package.
The proposals do not consider multiple occupant households	<b>40</b>	The council has noted concerns of multiple occupant households with the car club proposals. However, as seen in <a href="https://www.camden.gov.uk/car-clubs">https://www.camden.gov.uk/car-clubs</a> as well as in <a href="https://www.zipcar.com/en-gb">https://www.zipcar.com/en-gb</a> and <a href="https://www.enterpriseclub.co.uk/gb/en/home.html">https://www.enterpriseclub.co.uk/gb/en/home.html</a> , Car Clubs have initiatives readily available to meet the majority of households needs.
Car Clubs are not readily advertised enough across the borough	<b>6</b>	Information regarding Car Clubs in Camden can be found at <a href="https://www.camden.gov.uk/car-clubs">https://www.camden.gov.uk/car-clubs</a> as well as on <a href="https://www.zipcar.com/en-gb">https://www.zipcar.com/en-gb</a> and <a href="https://www.enterpriseclub.co.uk/gb/en/home.html">https://www.enterpriseclub.co.uk/gb/en/home.html</a>
Car Clubs are not actively utilised by people in Camden	<b>62</b>	Camden currently has nearly 250 cars available to rent through Zipcar and Enterprise Car Club, suggesting that there is demand for car clubs in London. Furthermore, a <a href="#">report</a> by CoMoUK identified 23,362 households in Camden that could make the switch to car clubs. Camden will continue to support the back-to-base car club model and work with operators to support the update of car clubs through offers like free memberships and driving credits.

Theme	# of Responses	Officer Response
		This proposal is only element of a larger range of measures intended to reduce private car ownership, as detailed in the <a href="#">Camden Transport Strategy</a> . Other measures include streetscape improvements to encourage walking in accordance with Camden's Walking and Accessibility Action Plan, cycling infrastructure improvements in accordance with the Cycling Action Plan, regular reviews of parking fees and charges, expanded cycle hire systems and public transport improvements.
The proposals are financially motivated and are centred on raising Council revenue.	<b>41</b>	The council has committed to reviewing parking fees and charges regularly as a means of delivering environmental, public health and transport objectives in local and regional adopted policies for example as set out in the <a href="#">Climate Action Plan</a> and <a href="#">Camden's Transport Strategy</a> . These policy objectives are the sole reason for seeking to introduce the proposed changes. Any financial implications are reported (see section 7 of the main report).
Other boroughs have better Car Club schemes	<b>19</b>	Benchmarking with similar and neighbouring boroughs shows that proposed Camden's Car Club permit prices would be within the range of prices among other boroughs. Camden currently offers nearly 250 vehicles available to rent through car club operators and will continue to work with operators to identify new locations for vehicles and to provide support offers like free membership and driving credits for residents and businesses.
Car Clubs help the transition from private car ownership to shared car ownership	<b>63</b>	The council notes respondents support of proposals and the borough wide efforts to shift away from private car ownership in line with local and regional policy objectives.
The proposals do not go far enough the proposals do not go far enough and more should be done in line with the	<b>69</b>	The council will continue to investigate further avenues and pathways that can be pursued to continue achieving Camden' transport and environmental goals.

Theme	# of Responses	Officer Response
suggested policies.		
The proposals are environmentally beneficial	<b>209</b>	The council notes respondents support of the proposals.

### Visitor Permits

Theme	# of Responses	Officer Response
Motorcycles should not be charged for parking	<b>181</b>	Free parking for motorcycles in around 337 solo motorcycle bays goes against the council's ambitious policy objectives, such as those outlined in the Transport Strategy and Clean Air Action Plan, to work towards a modal shift from private vehicles to walking, cycling and public transport and improve air quality throughout the borough. See further responses to this point in the motorcycle permit section.
Low-income households are disproportionately impacted by the increased permit prices	<b>181</b>	The council acknowledges that that the increased costs may impact some low-income households. Considering this, a set of measures to alleviate the impact of these changes has been put forward, on top of these charges being phased in over two years. Furthermore, residents over 75 years old and disabled people will continue to receive discounted Visitor permits and it is proposed that the allowance of 600 hours of short stay and 10 all day visitor permits per individual currently offered for CPZs north of Euston Road will be extended to CPZs south of Euston Road. For more information on these measures, please refer to section 5 and Appendix 5: Cost of Living Support package. It is also noted that (i) 2/3rds of Camden households do not own a car/van and (ii) the lowest income households in the Borough typically have lower car ownership than the highest income households. A full exploration of this issue is set out in the Equalities Impact Assessment in Appendix 2.
The duration of visitor parking is not long enough	<b>62</b>	The council's proposals have not impacted the duration of visitor parking in the borough.

Theme	# of Responses	Officer Response
The proposals do not consider blue badge holders	<b>40</b>	<p>It is important to note that blue badge holders themselves can park for free in many bays throughout the Borough. There is also a <a href="#">discounted visitor permit price</a> for those residents that are disabled or over 75. The council aims to make sure that disabled people feel supported in their everyday travels. As such, Camden offers a range of services that disabled people can use to get around more easily.</p> <p>These services include:</p> <ul style="list-style-type: none"> <li>• PlusBus Door to Door</li> <li>• Blue Badge parking for disabled people</li> <li>• Green Badge parking for disabled people</li> <li>• ScootAbility</li> <li>• Taxicard</li> <li>• Freedom Pass</li> <li>• Independent travel training</li> </ul> <p>We continue to develop and change our public spaces to make it easier for disabled people to travel more healthily and sustainably in our borough.</p>
Residents are not in control of what vehicle their Visitors drive, making the proposals unfair	<b>183</b>	<p>The council has noted concerns over residents not having control over their visitors' vehicles. However, the registration of visitor's vehicles is necessary to apply emission-based charges in an equitable manner in line with the policies and targets set out in the report.</p>
Trade/small businesses are unfairly impacted by proposals	<b>193</b>	<p>The concerns of impact of the Visitor permit proposals on tradespeople/small businesses are noted. However, it should also be noted that tradespeople have their own dedicated permit type (Trade Permits), which can be used to access parking throughout the borough. This permit type will be reviewed in a future consultation to ensure it better aligns with the needs of tradespeople and their customers.</p>
The proposals are financially motivated and are centred on	<b>124</b>	<p>The council has committed to reviewing parking fees and charges regularly as a means of delivering environmental, public health and transport objectives in local and regional adopted policies for example as set out in the <a href="#">Climate Action Plan</a> and <a href="#">Camden's Transport Strategy</a>. These policy</p>

Theme	# of Responses	Officer Response
raising Council revenue.		objectives are the sole reason for seeking to introduce the proposed changes. Any financial implications are reported (see section 7 of the main report).
Cost of living crisis worsens the impact of the permit price increases	<b>37</b>	The council acknowledges that the current cost-of-living crisis may worsen the impact of the permit price increases. Considering this, a set of measures to alleviate the impact of these changes has been put forward. This includes a <a href="#">discounted visitor permit price</a> for those residents that are disabled or over 75. In addition, these charges are being phased in over two years. For more information on these measures, please refer to section 8 and Appendix 5: Cost of Living support package.
Concerns that the proposals do not address the Council's transport and climate objectives	<b>91</b>	The proposals aim to achieve policy objectives found in in <a href="#">Camden's Transport Strategy</a> , <a href="#">Clean Air Action Plan</a> , <a href="#">Climate Action Plan</a> , <a href="#">We Make Camden</a> , <a href="#">Joint Health and Wellbeing Strategy</a> and various London wide policies. If implemented, the impact of the proposals would be carefully monitored to ensure that they are effectively helping to meet these objectives.
Concerns that the proposals do not address the efficiency of Camden's public transport network	<b>41</b>	Camden benefits from a robust public transport network that is well connected to other areas of London and the wider UK. The average PTAL score, which is a rating for the accessibility of an area to the public transport network, for Camden is 5 (the third highest score available). This score makes Camden the fourth most accessible borough in London.
The proposals are environmentally beneficial	<b>170</b>	The council notes respondents support of the proposals.
Despite the increased permit costs, the proposals are reasonable	<b>48</b>	The council is committed to reviewing parking fees and charges regularly as a means of delivering environmental and transport objectives.
The visitor permits work well currently and should not be changed	<b>112</b>	The council notes respondents support for the existing Visitor permit regulations; however the proposed changes are necessary for Camden to achieve the policy objectives set forth in the in <a href="#">Camden's Transport Strategy</a> , <a href="#">Clean Air Action Plan</a> , <a href="#">Climate Action Plan</a> , <a href="#">We Make Camden</a> , <a href="#">Joint Health and Wellbeing Strategy</a> .

## Paid for Parking

Theme	# of Responses	Officer Response
Cost of living crisis worsens the impact of the permit price increases	41	The council acknowledges that that the current cost-of-living crisis may worsen, for some households, the impact of the permit price increases. Considering this, a set of measures to alleviate the impact of these changes has been put forward, on top of these charges being phased in over two years. For more information on these measures, please refer to section 5 and Appendix 5: Cost of Living Support package. See above regarding “low income households”. A wider Cost of Living Support package (beyond transport measures) is also available, as set out <a href="#">here</a> .
The proposals are financially motivated and are centred on raising Council revenue.	164	The council has committed to reviewing parking fees and charges regularly as a means of delivering environmental, public health and transport objectives in local and regional adopted policies for example as set out in the <a href="#">Climate Action Plan</a> and <a href="#">Camden’s Transport Strategy</a> . These policy objectives are the sole reason for seeking to introduce the proposed changes. Any financial implications are reported (see section 7 of the main report).
Low-income households are disproportionately impacted by the increased permit prices	89	As above, the council acknowledges that that the current cost of living crisis may worsen, for some households, the impact of the permit price increases. Considering this, a set of measures to alleviate the impact of these changes has been put forward, on top of these charges being phased in over two years. For more information on these measures, please refer to section 5 and Appendix 5: Cost of Living Support package. See above regarding “low income households”. A wider Cost of Living Support package (beyond transport measures) is also available, as set out <a href="#">here</a> .
There is no evidence the proposals will work	160	At current charging levels, we have seen that almost 8 times more Resident permits are associated with electric vehicles in 2022/23, compared to 2018/19 (emissions-based charges were introduced in 2020). Meanwhile, during the same period, vehicles with emissions between 186-225 and over 226 g/km decreased by 22% and 30%, respectively. Vehicles in the lowest emission band (1-75 g/km) increased by 209%. It is anticipated that similar patterns will be observed with respect to Paid for Parking transactions with the proposed changes to Paid for Parking, alongside other policies and actions. If implemented, the impact of the proposals on Paid for Parking would be carefully monitored to ensure that they are effectively helping to meet these objectives.

Theme	# of Responses	Officer Response
The parking apps are difficult to use	<b>39</b>	Camden's cashless parking provider is JustPark. There is signage across the borough with information on how to pay online, by phone or using the JustPark smartphone app. If you need assistance, have a query about this service, or need to apply for a refund, see the JustPark help pages or call 020 3318 9792. The council will continue to work with the parking provider to make the products as easy to use as possible through continued improvements and updates.
Motorcycles should not be charged for parking	<b>77</b>	It should be noted that motorcycles have always been charged the same in Paid for Parking bays. Even with the introduction of charging for solo motorcycle bays, these bays will be £1.33 (for electric motorcycles) and £2.60 (for non-electric motorcycles) daily, which is much cheaper than existing paid for parking equivalent charges. These price increases for paid for parking is aimed to help meet the Council's ambitious policy objectives, such as those outlined in the Transport Strategy and Clean Air Action Plan, to work towards a modal shift from private vehicles to walking, cycling and public transport or encourage the use of less polluting vehicles when vehicle use is essential.
The proposals will help reduce private car usage	<b>28</b>	The council notes respondents support of the proposals.
The proposals do not go far enough the proposals and more should be done in line with the suggested policies.	<b>47</b>	The council will continue to investigate further avenues and pathways that can be pursued to continue achieving Camden' transport and environmental goals in <a href="#">Camden's Transport Strategy</a> , <a href="#">Camden Climate Action Plan</a> and <a href="#">Clean Air Action Plan</a> . Furthermore, should these proposals be approved, the impact will be monitored, and such data will be used in further reviews in future years.
The proposals are environmentally beneficial	<b>105</b>	The council notes respondents support of the proposals.
Despite the increased permit costs, the proposals are reasonable	<b>35</b>	The council is committed to reviewing parking fees and charges regularly as a means of delivering environmental and transport objectives.

### Merging Paid for Parking Tariff Area 1 and 2

Theme	# of Responses	Officer Response
The proposals are financially motivated and are centred on raising Council revenue.	<b>129</b>	The council has committed to reviewing parking fees and charges regularly as a means of delivering environmental, public health and transport objectives in local and regional adopted policies for example as set out in the <a href="#">Climate Action Plan</a> and <a href="#">Camden's Transport Strategy</a> . These policy objectives are the sole reason for seeking to introduce the proposed changes. Any financial implications are reported (see section 7 of the main report).
The proposed price increases are unreasonable	<b>150</b>	To help mitigate the impact of increased charges, the Council will expand its support offers to include subsidies for car club use. This is in addition to existing offers, which include discounted e-cycle rentals and Bus and Tram Discounts from TfL.
Low-income households are disproportionately impacted by the increased permit prices	<b>35</b>	The council acknowledges that that the increased costs may impact some low-income households. Considering this, a set of measures to alleviate the impact of these changes has been put forward, on top of these charges being phased in over two years. For more information on these measures, please refer to section 5 and Appendix 5: Cost of Living Support package. It is also noted that (i) 2/3rds of Camden households do not own a car/van and (ii) the lowest income households in the Borough typically have lower car ownership than the highest income households. A full exploration of this issue is set out in the Equalities Impact Assessment in Appendix 2.
There is no evidence the proposals work	<b>41</b>	A study commissioned by Camden in 2019 (and updated in 2022) to assess the appropriateness of the controlled parking zone (CPZ) hours of control across the borough has shown that maintaining the current Tariff area 1 with a lower charge is not appropriate. The study 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. If implemented, the impact of the proposals would be carefully monitored to ensure that they are effectively helping to meet these objectives and this monitoring data will be used in future reviews in upcoming years.
The maps showing the merge are not clear enough	<b>113</b>	This concern has been noted and the council has aimed to set out the existing and proposed tariff zones as clearly as possible.
The merge is reasonable	<b>188</b>	The council notes respondents support of the proposals.



## Motorcycle Permits

Theme	# of Responses	Officer Response
The proposals are financially motivated and are centred on raising Council revenue.	<b>64</b>	The council has committed to reviewing parking fees and charges regularly as a means of delivering environmental, public health and transport objectives in local and regional adopted policies for example as set out in the <a href="#">Climate Action Plan</a> and <a href="#">Camden's Transport Strategy</a> . These policy objectives are the sole reason for seeking to introduce the proposed changes. Any financial implications are reported (see section 7 of the main report).
Proposals do not offer alternative safe parking for motorcycles	<b>30</b>	Ground anchors for motorcycle safe parking are only available in solo motorcycle bays and these will not be removed under the proposals.
Proposals do nothing to tackle noise pollution caused by motorcycles	<b>43</b>	The proposed introduction of charges for motorcycles is aimed at discouraging inessential motorcycle use and if successful, it is anticipated that this would reduce their contribution to noise pollution. Additionally, the discount for electric motorcycles is intended to encourage, for when there is an essential need for a motorcycle, a switch to electric motorcycles, which are less noisy than their petrol counterparts.
Removing free solo motorcycle bays will lead to people parking their motor vehicles in an inappropriate manner	<b>6</b>	Parking bays are designed to take into account vehicle size and road safety concerns that could be caused by unsafe and illegal parking (e.g. motorcycles parking on footways). As set out earlier in the report, except for solo motorcycle bays, every vehicle is assigned 5 metres for parking hence the impact of motorcycles parking parallel to the kerb would be minimal. Additionally, Camden actively enforces appropriate parking and will continue to do so if these proposals are implemented to ensure motorcycles are parked safely.
Motorcycles should not be charged as they reduce congestion	<b>200</b>	The proposals are not solely aimed at addressing congestion. Given that motorcycles contribute to carbon and other emissions, noise pollution and are not an active mode of travel, it is difficult to justify maintaining free parking for them. Additionally, maintaining free parking means that it is

Theme	# of Responses	Officer Response
		cheaper to park a motorcycle on the public highway than for cyclists to use bike hangars which is at odds with the council's intention to incentivise cycling.
People with electric motorcycles are getting punished for owning green vehicles	<b>50</b>	These comments have contributed to informing the council's decision to reduce motorcycle permit charges for electric motorcycles (in recognition that electric motorcycles have lower impacts on air quality than electric cars/vans).
Increased policing of motorcycles is welcome	<b>81</b>	It is anticipated that the proposals will encourage the use of motorcycles only where there is essential need for a motor vehicle.
The proposals are environmentally beneficial	<b>58</b>	These comments are noted.
The proposals do not go far enough the proposals and more should be done in line with the suggested policies.	<b>40</b>	If implemented, the impact of the proposals would be carefully monitored to ensure that they are effectively helping to meet these objectives and this data will be used to inform further reviews in upcoming years.
Motorcycles pollute just like cars and should be charged for parking	<b>40</b>	The council notes respondents support of the proposals.
The proposals treat motorcycles like low polluting cars (both in the proposals and their rationale)	<b>2</b>	The charges that are proposed are based on the emissions and polluting impacts of motorcycles as well as motorcycles not being an active form of travel rather than them being low polluting cars as set out earlier in the report. Where the impact of motorcycles is different from cars, this is demonstrated under the proposals. For example, a daily charge for motorcycle parking does not exceed £2.60 whereas the equivalent for cars/ vans is £43.31 and a lower permit price for electric motorcycles is now proposed compared to other electric vehicles.

Theme	# of Responses	Officer Response
		Additionally, Camden's approach where in some instances cars and motorcycles pay the same amount is not unusual. For example, under Hackney's introduction of motorcycle charges in Zone B, all motor vehicles will pay the same to park in 2025/ 26 financial year.
As a result of restricting permits to a single vehicle, residents will choose cars over motorcycles	<b>2</b>	It is anticipated that the impact of this will be minimal especially where the carbon emissions of a car exceed 75g/km and it is not compliant under the air quality surcharge as this results in higher parking charges compared to the charge for a motorcycle. However, if approved for implementation, the impacts of these proposals will be carefully monitored, and consideration will be given to changing our approach if there is evidence that the proposals are entrenching car use.
A reduction in motorcycle numbers reduces their safety based on the principle of 'safety in numbers'	<b>2</b>	<p>The points on safety in numbers for motorcyclists are noted. However, this needs to be balanced with the fact that motorcycle use contributes to road transport emissions and pollution and is not an active mode of travel. To improve motorcycle road safety, Camden uses other levers including contributing funds to 2Wheels London to enable Camden businesses, employees and residents to access information, training material, and video clips on motorcycle safety. This is particularly aimed at improving PTW safety for those who rely on the use of PTWs for employment. The Council also promotes TfL's free motorcycle training courses (subject to availability) and is looking to purchase "BikeSafe" vouchers for additional biking ability/safety courses for motorcyclists living in or visiting the Borough.</p> <p>Every major scheme in Camden is subjected to a Road Safety Audit before the design is finalised. Any issues raised through this process are considered and addressed through this mechanism, including any impact on motorcyclist safety. These documents are frequently shared with the Metropolitan Police – Road Safety Engineering Unit for further scrutiny.</p>
Car free development occupants will need a daily permit to park which results in their charges being higher than the most	<b>2</b>	These comments are noted however it is not appropriate to compare the daily motorcycle charge to the parking permit of a diesel car. This is because for a daily permit price is the main lever available to the Council to restrain demand / use of this permit type. For other products such as resident, doctor and business permits where evidence of eligibility is required as well, proposed prices are generally lower.

Theme	# of Responses	Officer Response
expensive diesel permit		
Block booking which would bring down the daily cost is not proposed	2	Camden does not offer block booking discount for short term parking products to ensure that they are only used where there is essential need for motor vehicles.
Increase in charges for motorcycles higher than that of cars	2	The increase in motorcycle charges being greater than that of cars is because cars have had some form of parking charges applied to them for almost 20 years whereas motorcycle charges have not. It is officers' view that applying the same levels of parking charge increase to both cars and motorcycles would set the prices of motorcycle too low to reflect their impact and to discourage their inessential use / ownership.
The differences between PTWs and cars is far greater than the difference between cars and HGVs, for example while 3 cars can fit in the space of one HGV when parked, around 8 PTWs can fit in the space of 1 car.	2	The consideration of the impacts of motorcycles on kerbside space are set out earlier in the report and where appropriate a discount in parking permit prices has been applied. It should be noted that the council does not provide parking spaces for HGVs and hence these proposals are not relevant to them.
The proposals do not allow roaming in the borough on a single pass which will have an impact on access to secure motorcycle parking, car free	2	The proposed daily permit allows the permit holder to park in any solo motorcycle bay for the day.

Theme	# of Responses	Officer Response
development occupants and tradespeople		

### Doctor Permits

Theme	# of Responses	Officer Response
The 22% discounted rate for Doctor permits is not enough	<b>14</b>	Under the proposed structure, Doctor permits for EVs would be less than their current price and Doctor permits for the lowest emission band would be the same price.
Prices for doctor permits should be based on the reason for parking.	<b>21</b>	These comments have informed the council's decision amend its proposals to allow existing surgeries to keep their bays however for all new Doctor permits, no new dedicated Doctor bays will be provided.
Doctors should not have to pay for parking	<b>99</b>	Our proposed approach aligns with goals set out by the NHS around health, air quality and climate change. Specifically, the NHS has acknowledged its role in combatting air pollution and climate change in their <a href="#">Net Zero travel and transport strategy 2023</a> , calculating that its current fleet contributes to 36,000 deaths a year from air pollution.
The proposed price increases will impact the healthcare of residents	<b>69</b>	These comments have informed the council's decision amend its proposals to allow existing surgeries to keep their bays however for all new Doctor Permits, no new dedicated Doctor bays will be provided.
Dedicated parking bays for Doctor permits are unnecessary	<b>110</b>	The council notes respondents support of the proposals to not introduce any new parking bays for doctors for any new practices.

Theme	# of Responses	Officer Response
The proposals are environmentally beneficial	<b>242</b>	The council notes respondents support of the proposals and the environmental benefits that will stem from them.