

OFFICER DELEGATED DECISION 18 OCTOBER 2021

Report title: Proposed Controlled Parking Zone (CPZ) in the St Leonard's area

Wards: St Leonard's; Streatham South

Portfolio: Councillor Mahamed Hashi/Councillor Danny Adilypour, Cabinet Member for Sustainable Transport, Environment and Clean Air (job share)

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REPORT SUMMARY

This report considers the responses to the statutory consultation carried out in May/June 2021 relating to the introduction of Controlled Parking Zones (CPZs) in the St Leonard's area. It recommends proceeding with the proposal as advertised, albeit with modifications as outlined in the report.

FINANCE SUMMARY

The cost of implementing the proposed measures is estimated at £135,500. This includes the publication of the Traffic Management Orders, road marking, traffic signs and traffic management. A budget will be drawn down from the existing Parking theme CIP allocation for 2021/22 to cover these costs.

RECOMMENDATIONS

1. To note the contents of the report
2. To note the EQIA prepared for the purpose (Appendix G)
3. Agree the drawdown of an allocation of £135,500 from the existing Parking theme CIP budget
4. Following consideration of representations and objections received during the statutory consultation (and collected in Appendices C, D, E, I and J), to make traffic management orders creating the following parking controls, all as illustrated in Appendix B to this report:
 - a. introduce a new St Leonard's North (Zone I) CPZ operational Monday to Friday between 12pm (noon) and 2pm;
 - b. introduce a new St Leonard's Central (Zone O) CPZ operational Monday to Friday between 8.30am and 6.30pm;
 - c. introduce a new Stanthorpe Triangle (Zone U) CPZ operational Monday to Friday between 12pm (noon) and 2pm;

- d. introduce at any time (double yellow line) waiting restrictions at the locations listed in Appendix F and shown in Appendix H;
- e. introduce Electric Vehicle recharging bays:
 - i. on Barrow Road outside No. 19
 - ii. on Barrow Road by the side of No.20 Estreham Road
 - iii. on Donnybrook Road outside No. 37
 - iv. on Donnybrook Road outside No. 47
 - v. on Hambro Road outside No. 89

1. CONTEXT

- 1.1 In September 2019, a total of 7,985 premises within the St Leonard's and Streatham South wards were consulted on whether to introduce a Controlled Parking Zone (CPZ) in their road, based on the overall indicative proposal of introducing five CPZs in the area as follows: St Leonard's North (Zone I); St Leonard's Central (Zone O); Stanthorpe Triangle (Zone U); St Leonard's South (Zone X) and Streatham Vale West (Zone Y).
- 1.2 Termed a stage 1 consultation, this involved a survey that sought to establish residents' and businesses' views on whether they considered there to be a sufficient parking problem for them to support the introduction of parking controls in their road.
- 1.3 To help inform this decision, the consultation included a newsletter explaining the reasons for the consultation, what the proposals were and how a CPZ works, the permit pricing structure at the time of the consultation, a frequently asked questions sheet, and instructions on how to participate in the consultation.
- 1.4 In addition, the consultation material directed the recipient to a webpage which contained all the relevant information including an online survey, as well as an indicative layout of where vehicles would be able to park were a CPZ to be introduced. Officers used the survey results to inform whether to proceed to statutory consultation (in either an unamended or amended form), or whether the proposal should be withdrawn.
- 1.5 At that time, the majority of respondents within the St Leonard's South (Zone X) and Streatham Vale West (Zone Y) areas opposed parking controls. In light of this, the decision was taken in April 2021, by way of a Delegated Decision report, to withdraw proposals to introduce CPZs in those areas, but to proceed with statutory consultation on the introduction of St Leonard's North (Zone I), St Leonard's Central (Zone O), and Stanthorpe Triangle (Zone U) CPZs.
- 1.6 It was also decided that statutory consultation should take place on proposals for "at any time" waiting restrictions (double yellow lines) and Electric Vehicle recharging bays at locations within the St Leonard's South and Streatham Vale West areas. It was considered that the introduction of "at any time" waiting restrictions would minimise the risk of parked cars causing an unreasonable highways obstruction.

2. PROPOSAL AND REASONS

Statutory Consultation

- 2.1 Statutory consultation was carried out between 7 May and 4 June 2021. It comprised of:
 - a) A total of 7,985 newsletters posted to the following properties:

- within the proposed St Leonard’s North (Zone I) CPZ, St Leonard’s Central (Zone O) CPZ and Stanthorpe Triangle (Zone U) CPZ;
- on Streatham High Road adjacent to the proposed CPZs;
- other streets where the council had decided that no CPZ would be introduced identified as St Leonard’s South (Zone X) and Streatham Vale West (Zone Y) areas in the stage 1 consultation

- Legal Notices of the Council’s intentions were attached to lamp columns throughout the affected area;
- Legal Notices of the Council’s intentions were published in the South London Press and the London Gazette;
- An announcement was made on the Council’s website that the consultation was open, with links to all the above documents, and
- Copies of the proposed traffic management orders (TMOs), detailed plans of the proposals and the Council’s Statement of Reasons were published on the Council’s website, as well as being made available for inspection upon appointment.

2.2 The newsletter gave an overview of the proposals and gave an explanation as to how to respond to the statutory consultation. A postal and email address was provided for residents and businesses to submit comments to the proposals. The newsletter also directed the recipient to the Council’s website for all relevant documentation relating to the proposal including, detailed drawings, details of the results of the stage 1 consultation, and the decisions taken to proceed with the CPZ proposals, and gave a telephone number if the recipient had any issues accessing the above information.

2.3 All measures that were subject to statutory consultation are shown in Appendix A.

Statutory Consultation Representations

2.4 The statutory consultation generated 272 written representations, with 167 objecting to the proposals, 89 in support and 16 other representations. Their distribution is summarised in Table 1. Details of all representations received can be found in Appendix J with the representations focussed on the St Leonard’s North (Zone I) CPZ, St Leonard’s Central (Zone O), Stanthorpe Triangle (Zone U) and those representations which covered multiple issues or where the origination or subject was not stated or clear – noted in Table 1 as “Not stated”, outlined in Appendices C, D, E and I respectively.

Table 1 – Distribution of feedback - Overall

CPZ Proposal	Object	Support	Comment	Total
St Leonard’s North (Zone I) CPZ	30	35	5	70
St Leonard’s Central (Zone O) CPZ	90	43	8	141
Stanthorpe Triangle (Zone U) CPZ	11	6	-	17
Outside of the proposed CPZ areas	21	-	3	24
Not stated	15	5	-	20
Total	167	89	16	272

- 2.5 As statutory consultations are designed to elicit comments and objections to a defined proposal the relatively low feedback rate (3%) with approximately a third of respondents supportive of the proposals, may indicate a relative lack of concern about the proposal across the community. The range of issues raised, and the geographical origination of feedback received provides assurance that the consultation did penetrate the target audience. To give some context, proposals in 2019 to introduce the Streatham Hill East CPZ, as well as extend the Tulse Hill CPZ into Probyn Road and extend the Brixton Hill CPZ into Roupell Road, generated a 21% feedback rate.
- 2.6 Analysis of the objections received across the proposed CPZ areas indicate that there are prevalent recurring or similar subjects/themes as well as location-specific issues which have been raised by respondents, that need to be considered before deciding whether to proceed, amend or abandon the proposals.

Proposed St Leonard's North (Zone I) CPZ – Statutory Consultation objections and comments

- 2.7 A total of 70 representations logged as originating from and/or regarding the proposed St Leonard's North CPZ area, were received in response to the statutory consultation. Of these representations, 30 were objections, and 35 were in support of the proposals. 5 were comments/representations identified neither as an objection nor in support of the proposals. A road-by-road summary is shown in Table 2. Additional representations may have been received regarding the proposed St Leonard's North (Zone I) CPZ, where the origination or subject was not stated or clear, or where the representation covered multiple issues – these are covered in the *Location/origination not stated or general issues raised - Statutory Consultation objections and comments* section of this report.

Table 2 – Distribution of feedback – proposed St Leonard's North (Zone I) CPZ

Road name	Object	Support	Comment	Total
Abbotswood Road	2	2	1	5
Becmead Avenue	1	-	1	2
De Montfort Road	3	2	-	5
Dorrien Walk (off Drewstead Road)	1	-	-	1
Drewstead Road	6	6	-	12
Hoadly Road	3	1	-	4
Kingscourt Road	1	8	-	9
Moorcroft Road	1	1	-	2
Mortimer Close	2	5	2	9
Mount Ephraim Road	1	-	-	1

Norfolk House Road	-	4	-	4
Streatham High Road	3	-	-	3
The Spinney	2	1	1	4
Woodbourne Avenue	2	1	-	3
Woodfield Avenue	-	1	-	1
Not stated	2	3	-	5
Total	30	35	5	70

The feedback was varied in nature, although the most prevalent were comments that could be considered as general or reoccurring across the proposed CPZ, which are listed as follows. The details of these representations received, and a summary of their origin is outlined in Appendix C:

- 2.8 *That the costs of permits will be a financial burden on residents; that the proposals are a money-making exercise; that the costs are additional taxation to motorists/residents (14 mentions)*

Officer response

The Council's Transport Strategy and its Air Quality Action Plan make clear that it will use CPZs to encourage the use of more sustainable modes of transport such as walking, cycling and public transport and to encourage the use of less polluting vehicles.

The current Secretary of State's Guidance on the introduction of a CPZ is that a scheme needs to be self-financing. This means that in order to cover the cost of implementing and enforcing the CPZ, the Council must charge for parking during controlled hours. In common with other highway authorities, the Council applies a fixed tariff that does not distinguish between a person's ability to afford the charges. Whilst this means that requiring to park in a CPZ during its operational periods would be proportionally less affordable to those on low income, it would be disproportionate in terms of cost and complexity to operate a means-based cost model. Lambeth's pricing structure for parking permits for residents' vehicles offers a sliding scale of charges according to the vehicle's carbon dioxide (CO₂) tailpipe emissions.

Given that the proposed St Leonard's North (Zone I) CPZ would only operate for two hours on a weekday, the cost to residents can be minimised if their visitors and tradespeople avoid the controlled hours (i.e. visit before 12 noon, after 2pm or at weekends). Where this is not possible, residents would be able to purchase up to 50 visitor permits a year at a cost of £5.58 a day or £24.50 for a book of five permits (noting that permit costs are subject to change).

- 2.9 *That the proposed CPZ would have a negative impact on local businesses (8 mentions)*

Officer response

Provision is made within the design of the CPZ to accommodate business parking, through the provision of shared-use resident permit/business permit/pay by phone bays at a number of locations within the proposed St Leonard's North (Zone I) CPZ. Businesses within - and in the case of Streatham High Road - immediately adjacent to the proposed CPZ, would be eligible to purchase business permits subject to certain conditions being met, which would entitle those business owners/employees to park in the CPZ during its operational periods.

In a similar way to resident permits, the Council applies a charge that does not distinguish between a person's/business' ability to afford the charges. Whilst this means that requiring to park in a CPZ during its operational periods would proportionally be less affordable to those on low income, it would be disproportionate in terms of cost and complexity to operate a means-based cost model.

For those visiting businesses for up to 1 hour, paid for parking opportunities exist throughout the proposed CPZ in the form of shared-use resident permit/Pay by Phone bays and shared-use resident permit/business permit/Pay by Phone bays, which make up the majority of designated parking bays in the CPZ.

It should be noted again that the proposed St Leonard's North (Zone I) CPZ would only operate for two hours a day between Mondays and Fridays, so costs can be minimised if visitors avoid the operational periods of the CPZ (i.e. visit before 12 noon, after 2pm or at weekends), when parking in the area would be generally free, although it is acknowledged that the operational period falls within the traditional lunchtime period.

2.10 *That the proposed operational period of the St Leonard's North (Zone I) CPZ is too short/should reflect the operational periods of St Leonard's Central (Zone O) CPZ (8 mentions)*

Officer response

The Stage 1 consultation results influenced the area and operational periods of the proposed CPZs. In the case of the proposed St Leonard's North (Zone I) CPZ, 215 (61.8%) of respondents favoured Monday-Friday controls, 56 (16.1%) preferred Monday-Saturday and 54 (15.5%) preferred seven days a week. In respect of the hours of operation, 157 (45%) preferred the option of two-hour controls, compared to 109 (31.2%) who were in favour of 8.30am to 6.30pm and 60 (17.2%) who opted for 10am to 4pm.

Accordingly, the proposal progressed with a two-hour CPZ in line with the consultation results.

2.11 *That there is no current parking problem/that there is no need for a CPZ (six mentions)*

Officer response

The Stage 1 consultation results influenced whether the proposed CPZs should progress to statutory consultation and in the case of the proposed St Leonard's North (Zone I) CPZ, 49.4% of respondents felt that they had a parking problem in their road and 43.2% felt they did not. In response to whether the recipient would support introduction of a CPZ in their road, 47.2% said that they would not, and 46.9% said that they would. However, when asked if they would reconsider and support the introduction of a CPZ in their road if adjacent streets were to be included in a CPZ, 55.1% of respondents indicated that they would, while 37.9% would still oppose a CPZ.

Although the responses appeared to indicate an overall opposition to parking controls, when broken down, only the majority of Becmead Avenue, Dingley Lane (private) and Drewstead Road respondents did not consider that they had a parking problem, were opposed to the introduction of a CPZ in their road; and would not reconsider if a CPZ were to be introduced in adjacent roads.

With this in mind, and given the Council's responsibilities under Sections 45(3) and 122 of the Road Traffic Regulation Act 1984 (RTRA), to consider both the interests of traffic and those of the owners and occupiers of adjoining properties, the need for maintaining the free movement of traffic, the need for maintaining reasonable access to premises, to secure the expeditious, convenient and safe movement of vehicular and other traffic including pedestrians, and the

provision of suitable and adequate parking facilities on and off the highway, it was considered that these roads should be included within the proposed CPZ. This is because if they were to be omitted whilst their neighbouring roads were included, there would be a risk of increased demand by motorists wishing to avoid the CPZ, resulting in increased parking demand for kerbside space, more motorists 'cruising' searching for available kerbside space to park their vehicles – with the resultant negative effect on air quality, with the additional potential danger to pedestrians and other road users.

- 2.12 *That there should be no yellow lines provided across vehicle crossovers (dropped kerbs)/that residents will no longer be able to park across the vehicle crossover outside their property, as this would impact residents by reducing parking opportunity (six mentions)*

According to the Traffic Signs Regulations and General Directions 2016, a CPZ is an area comprising a prohibition of waiting by all vehicles (indicated by yellow lines). It may include designated parking places. Accordingly, all kerbside space within a CPZ, not marked out as a parking bay, or where there is a crossing, or where there is a restriction on stopping, must be marked out by a yellow line.

As it stands, parking bays are provided where it is considered safe and appropriate for motorists to generally park their vehicles, which does not include across vehicle crossovers, and accordingly by law, yellow lines must be introduced along those lengths.

It is acknowledged that this would impact on those motorists who have become accustomed to parking their vehicle across the vehicle crossover outside their properties, however it is envisaged that the introduction of a CPZ would result in better management of the kerbside space and would free up appropriate kerbside space for use by permit holders.

It should be noted again that the proposed St Leonard's North (Zone I) CPZ would only operate for two hours every day between Mondays and Fridays, so outside of those periods, residents would generally be able to park across their vehicle crossover.

Other issues raised

- 2.13 In addition to the general reoccurring feedback subject, other issues were raised not so numerously, such as:
- questioning the analysis of the stage 1 consultation
 - concerned about the impact on visitors/contractors etc,
 - request that the CPZ should be reviewed after six months/one year
 - requesting a Bike Hangar, Electric Vehicle Bays, a one-way traffic system, road humps and a Low Traffic Neighbourhood
 - concern about parking for shoppers

Officer response

The principle of the analysis of the stage 1 consultation and permits which residents can obtain to enable visitors to park have been addressed above, as has the potential impact on businesses/shoppers with a description on the mitigating measures which have been put in place. Requests for bike hangars, electric vehicles and other traffic management measures, have been passed on to the relevant sections for the requests to be considered in the usual way.

If the CPZs were to be introduced, no review is scheduled, although minor issues raised may be picked up through an ad-hoc parking programme which takes place two to three times a year. If more significant issues about the design/operation of the CPZ arises, the best way forward would need to be considered at the appropriate time.

2.14 In addition, road-specific comments were received as follows:

2.15 *Abbotswood Road*

- *That the proposed bays (shared-use resident permit/pay by phone) outside Nos. 52 and 54 should be resident only*
- *That there should be less business permit parking provided*
- *That teacher, student and drop-off/pick up parking related to local schools are causing problems for local residents*

Officer response

It is understood that these concerns relate to parking activity primarily related to Streatham and Clapham High School where there are reportedly at least 50 staff, many of whom drive to work daily, and park on Abbotswood Road until they leave to go home. Furthermore, some sixth form students also reportedly drive and park in Abbotswood Road, again leaving their vehicles parked all day. In addition, according to residents, 1000 students come to school every day, many by car, resulting in congestion at drop-off and pick up times.

Similar parking activity directly affecting Abbotswood Road related to “Broomwood School” in Garrad’s Road has also been mentioned (although it is believed the resident meant Northwood Senior School).

Motorists enabling boarding and alighting activity from their vehicles is permitted on yellow lines and in parking bays, and therefore the introduction of a CPZ is unlikely to address this issue. In any case, the majority of parking restrictions/bays in Abbotswood Road would not be operational during the typical school drop-off and pick-up periods.

The CPZ would address general all-day parking by students as the two-hour CPZ restriction, and only one hour paid-parking available, would mean that motorists could no longer park all day in Abbotswood Road on a casual basis. For teachers however, the issue is not so definitive as teachers are eligible to purchase teachers’ permits which would enable them to park in shared-use bays, of which in one form or another take up all 100% of the parking bays proposed for the road.

However as there is a charge for teachers permits, if the CPZ were to be introduced, Officers are inclined to assess the take-up of these permits, and the subsequent impact on local roads by teacher parking before considering changes to the parking layout, which could be carried out via an ad-hoc parking changes programme, which is currently carried out 2-3 times annually.

With regards to the concerns about business permit parking, which would be accommodated through the provision of shared-use resident permit/business permit/pay by phone bays at a number of locations within the proposed St Leonard’s North (Zone I) CPZ, including in Abbotswood Road, again, Officers are minded to assess the impact of this post-implementation, particularly as Abbotswood Road appears to be one of the roads furthest away from the main business hub of the area, so would likely be impacted by business permit parking less than other roads in the area.

2.16 *Drewstead Road*

- *That there should be yellow lines at the bend near the railway sidings*
- *That there should be yellow lines at the Woodfield Avenue junction*
- *That there should be yellow lines/passing places outside No. 34 and at the Dingley Lane junction*
- *That illegal dropped kerbs should not be accommodated*
- *That there is an insufficient number parking bays provided at the Mortimer Close end of the road, including at the south end of the green island at the Drewstead Road/Mortimer Close junction, and at the westernmost extremity of the road, where it meets Tooting Commons*

Officer response

The design of the CPZ layout takes note of vehicle crossovers (dropped kerbs) that Officers consider appropriate and legally installed, although it is not possible in all circumstances to confirm whether all crossovers have been installed legally, depending on their age.

With regards to the requirement for yellow lines, Officers can confirm that the design of the CPZ incorporates yellow lines, by the bend near the railway sidings, at the Dingley Lane junction, and at the Woodfield Avenue junction (double yellow lines). It is considered that yellow lines are not required outside No. 34, particularly as there are yellow lines proposed nearby, outside No. 38 (single yellow line), and opposite Nos. 34 and 36 (double yellow line).

With regards to the number of parking bays proposed at the western end of the road (cul-de-sac end and Mortimer Close vicinity), Officers have sought to maximise the available kerbside space, whilst being mindful of the Council's responsibilities under Sections 45(3) and 122 of the Road Traffic Regulation Act 1984 (RTRA), to consider the need for maintaining the free movement of traffic, the need for maintaining reasonable access to premises, and securing the expeditious, convenient and safe movement of vehicular and other traffic including pedestrians.

In the case of the request for a parking bay at the south end of the green island at the Drewstead Road/Mortimer Close junction, it is considered unsafe to designate parking at this location. In addition, in the case of the westernmost extremity of Drewstead Road by Tooting Bec Common, Officers consider that the introduction of the proposed double yellow lines will enable motorists to safely manoeuvre to turn their vehicles around to travel in an eastbound direction.

2.17 Hoadly Road

- *That there should be more parking bays provided*
- *That the business and pay by phone parking should be removed/That bays should be resident permit only*

Officer response

It is acknowledged that due to the proposed CPZ layout of Hoadly Road, less parking bays have been proposed in comparison to how many and where vehicles currently park. This is mainly due to the number of vehicle crossovers in the road, and their proximity to each other, which impacts on the Council's practice in providing a minimum length of five metre bay with a safety margin from vehicle crossovers of one metre – hence requiring a total length of seven metres between crossovers.

In considering the inclusion of Hoadly Road in the CPZ, as well as in other local roads such as Abbotswood Road and Woodfield Avenue, Officers were mindful that the number of vehicle crossovers and their proximity to each other impacted upon the number of parking bays that could

be provided. Consequently, some concessions have been made in the usual practice when designing the parking layout, in order to provide the maximum number of parking spaces. In the case of Hoadly Road, three additional parking bays were proposed over and above what would have usually been considered, with an additional two, six and two additional spaces for Abbotswood Road, Woodfield Avenue and Drewstead Road respectively. It is considered that no additional bays can be provided at this time, although should the CPZ be introduced Officers are inclined to assess the parking demand in the area, before considering whether any additional bays could be provided, which could be carried out via an ad-hoc parking changes programme.

The proposed St Leonard's North (Zone I) CPZ would only operate for two hours every day Monday to Friday between 12 noon and 2pm. The yellow lines in place in Hoadly Road where parking bays are not provided would only operate during these hours, so outside of this period, motorists would generally be able to park in those locations, as they currently do, provided they do not cause any obstructions.

Similarly to Abbotswood Road, there is a concern relating to parking activity primarily associated with Streatham and Clapham High School. The CPZ would address general all-day parking by students as the two-hour CPZ restriction, and only one-hour paid-parking available, would mean that motorists could no longer park all day in Hoadly Road on a casual basis. Teachers however are eligible to purchase teachers' permits which would enable them to park in shared-use bays, of which in one form or another take up all 100% of the parking bays proposed for Hoadly Road.

However as there is a charge for teachers permits, if the CPZ were to be introduced, Officers are inclined to assess the take-up of these permits, and the subsequent impact on local roads by teacher parking before considering changes to the parking layout, which could be carried out via an ad-hoc parking changes programme, if sufficient representations are made.

2.18 *Mortimer Close*

- *That the proposed bays outside Nos. 1 and 2, and Nos. 11 and 12 should be angled to the kerbline which would allow more to be provided/That there would be a reduction of parking spaces*
- *That three to four spaces should be provided along inner green island*
- *That double yellow lines should be provided around the inner green island*

Officer response

Officers have noted the concern and have revisited Mortimer Close to establish whether any additional parking bays could be safely provided. Following investigation, it is confirmed that the proposed CPZ layout can be amended as follows:

- two parking bays perpendicular to the kerbline outside Nos. 1 and 2, in place of the originally proposed one parking bay parallel to the kerbline
- two parking bays perpendicular to the kerbline outside Nos. 11 and 12, in place of the originally proposed one parking bay parallel to the kerbline

Officers still consider that placement of the double yellow lines proposed around the inner green is necessary, and therefore do not recommend that parking bays are provided along this length.

2.19 *The Spinney*

- *That five resident bays exclusively for resident permit holders (one per house) are provided*
- *That two spaces on the Common side of the road at the cul-de-sac end be provided*

Officer response

The proposal for The Spinney allows for shared-use resident permit/pay by phone bays along the north-east side of the road, outside the properties of The Spinney, and to the side of No. 233 Bedford Hill. It is considered that resident permit holders will be the primary users of the bays, and Officers are inclined to assess the usage of the pay by phone if there are reported problems by residents about access to the bays, and if necessary, considering in changing the restrictions or parking layout, could be carried out via an ad-hoc parking changes programme.

In the case of the request for parking bays on the Common side of The Spinney near the school gates, it is considered inappropriate to designate parking at this location, Officers consider that the introduction of the double yellow lines that have been proposed will enable motorists to safely manoeuvre to turn their vehicles around to travel in a southbound direction.

Recommendation

It is recommended that The St Leonard's North (Zone I) CPZ be introduced as proposed, albeit with the following modifications:

- *That two parking bays are provided perpendicular to the kerbline outside Nos. 1 and 2 Mortimer Close, in place of the originally proposed one parking bay parallel to the kerbline*
- *That two parking bays perpendicular to the kerbline outside Nos. 11 and 12 Mortimer Close, in place of the originally proposed one parking bay parallel to the kerbline*

Proposed St Leonard's Central (Zone O) CPZ – Statutory Consultation objections and comments

2.20 A total of 141 representations originating from the proposed St Leonard's Central CPZ area, were received to the statutory consultation. Of these, 90 were objections, and 43 were in support of the proposals. Eight were comments/representations identified neither as an objection nor in support of the proposals. A road-by-road summary is shown in Table 3. Additional representations may have been received regarding the proposed St Leonard's Central (Zone O) CPZ, where the origination or subject was not stated or clear, or where the representation covered multiple issues – these are covered in the *Location/origination not stated or general issues raised - Statutory Consultation objections and comments* section

Table 3 – Distribution of feedback – proposed St Leonard's Central (Zone O) CPZ

Road name	Object	Support	Comment	Total
Ambleside Avenue	2	-	-	2
Babington Road	2	11	1	14
Conyers Road	8	2	1	11
Fairmile Avenue	9	3	-	12
Fernwood Avenue	5	10	-	15

Gleneagle Road	11	11	2	24
Mitcham Lane	2	1	-	3
Pinkerton Place (off Riggindale Road)	1	-	-	1
Riggindale Road	24	4	-	28
Rydal Road	11	1	2	14
Thirlemere Road	6	-	-	6
Tooting Bec Gardens	-	-	1	1
Whinfell Close (off Riggindale Road)	1	-	-	1
William Dyce Mews (off Babington Road)	1	-	-	1
Not stated	7	-	1	8
Total	90	43	8	141

2.21 The feedback was varied in nature, although similarly to the proposed St Leonard's North (Zone I) CPZ the most prevalent were objections/comments that could be considered general or reoccurring across this proposed CPZ, which are listed as follows. The details of these representations received, and a summary of their origin is outlined in Appendix D:

2.22 *That there is no current parking problem/that there is no need for a CPZ (52 mentions)*

Officer response

The Stage 1 consultation results influenced whether the proposed CPZs should go ahead and in the case of the proposed St Leonard's Central (Zone O) CPZ, 55.3% of respondents felt that they had a parking problem in their road and 35.9% felt they did not. In response to whether the recipient would support introduction of a CPZ in their road, 47% said that they would not, and 44.9% said that they would. However, when asked if they would reconsider and support the introduction of a CPZ in their road if adjacent streets were to be included in a CPZ, 55.3% of respondents indicated that they would, while 37.1% would still oppose a CPZ.

Accordingly, as the responses appeared to indicate an overall acceptance of parking controls, a CPZ was proposed for this area. However, when broken down, only the majority of Mitcham Lane, Riggindale Road and Rydal Road respondents did not consider that they had a parking problem, were opposed to the introduction of a CPZ in their road; and would not reconsider if a CPZ were to be introduced in adjacent roads.

With this in mind, and given the Council's responsibilities under Sections 45(3) and 122 of the Road Traffic Regulation Act 1984 (RTRA), to consider both the interests of traffic and those of the owners and occupiers of adjoining properties, the need for maintaining the free movement of traffic, the need for maintaining reasonable access to premises, to secure the expeditious, convenient and safe movement of vehicular and other traffic including pedestrians, and the provision of suitable and adequate parking facilities on and off the highway, it was considered that

these roads, with the exception of Mitcham Lane, which remains under the jurisdiction of Transport for London, should be included within the proposed CPZ. This is because If they were to be omitted whilst their neighbouring roads were included, there would be a risk of increased demand by motorists wishing to avoid the CPZ, and a lack of alternative parking opportunity for those resident due to the road layout in that particular area. Omission from the CPZ could risk an increased parking demand for kerbside space, more motorists 'cruising' searching for available kerbside space to park their vehicles – with the resultant negative effect on air quality, with the additional potential danger to pedestrians and other road users.

2.23 That the proposed operational period of the St Leonard's Central (Zone O) CPZ is too long/should reflect the operational periods of St Leonard's North (Zone I)/Stanthorpe Triangle (Zone U) CPZs (46 mentions)

Officer response

The Stage 1 consultation results influenced the area and operational periods of the proposed CPZs and in the case of the proposed St Leonard's Central (Zone O) CPZ, 59% of respondents favoured Monday-Friday controls, 12% preferred Monday-Saturday and 24.4% preferred seven days a week. In respect of the hours of operation, 42.6% preferred the option of 8.30am to 6.30pm restrictions, compared to 109 (32.8%) who were in favour of two-hour controls and 19.6% who opted for 10am to 4pm.

Accordingly, the proposal progressed with a Monday to Friday 8.30am to 6.30pm CPZ in line with the overall consultation results.

2.24 That the costs of permits will be a financial burden on residents; that the proposals are a money-making exercise; that the costs are additional taxation to motorists/residents (36 mentions)

Officer response

The Council's Transport Strategy and its Air Quality Action Plan make clear that it will use CPZs to encourage the use of more sustainable modes of transport such as walking, cycling and public transport and to encourage the use of less polluting vehicles.

The current Secretary of State's Guidance on the introduction of a CPZ is that a scheme needs to be self-financing. This means that in order to cover the cost of implementing and enforcing the CPZ, the Council must charge for parking during controlled hours. In common with other highway authorities, the Council applies a fixed tariff that does not distinguish between a person's ability to afford the charges. Whilst this means that requiring to park in a CPZ during its operational periods would be proportionally be less affordable to those on low income, it would be disproportionate in terms of cost and complexity to operate a means-based cost model. Lambeth's pricing structure for parking permits for residents' vehicles offers a sliding scale of charges according to the vehicle's carbon dioxide (CO₂) tailpipe emissions.

Given that the proposed St Leonard's North O CPZ would operate on weekdays between 8.30am and 6.30pm, the cost to residents can be minimised if their visitors and tradespeople avoid the controlled periods. Where this is not possible, residents would be able to purchase up to 50 visitor permits a year at a cost of £5.58 a day or £24.50 for a book of five permits (noting that permit costs are subject to change).

2.25 That the low response rate to the stage 1 consultation is not representative of the community's views/That the stage 1 consultation results were not in line with the proposal (37 mentions)

Officer Response

As detailed in paragraph 2.1, the council made considerable efforts to consult everyone potentially affected by the proposals. From experience when consulting on traffic or parking proposals using letters individually addressed to householders of premises within the affected area, a typical response rate is between 9-12%. The response rate of 11.6% to the stage 1 consultation was therefore in line with expectations. Higher response rates may have been achievable by 'door-knocking' those properties that have not responded to the consultation, but this was not considered proportionate to the information that such an exercise would glean.

With regards to the analysis of the stage 1 consultation, overall, the feedback indicated that the majority were in favour of a Monday to Friday, 8.30am to 6.30pm CPZ in the St Leonard's Central (Zone O) CPZ. However as outlined in paragraph 2.23, respondents from Mitcham Lane, Riggindale Road and Rydal Road considered that they did not have a parking problem, were opposed to the introduction of a CPZ in their road; and would not reconsider if a CPZ were to be introduced in adjacent roads.

However, it was considered that if a CPZ was not proposed in Riggindale and Rydal Roads, that they could be negatively impacted if the CPZ were to be introduced in neighbouring roads, particularly given their location, where they would be bounded by red route and/or CPZs to the north, east and south, and by a railway line and borough boundary to their west. Such a scenario could potentially result in displacement into these roads, as well as offering the residents of these road, limited opportunity to park in alternative locations, as they would not be eligible for permits for the surrounding CPZs.

2.26 *That the proposed CPZ would have a negative impact on local businesses (7 mentions)*

Officer response

Provision is made within the design of the CPZ to accommodate business parking, through the provision of shared-use resident permit/business permit/pay by phone bays at a number of locations within the proposed St Leonard's Central (Zone O) CPZ, and giving businesses within - and in the case of Streatham High Road - immediately adjacent to the proposed CPZ, eligibility to purchase business permits subject to certain conditions being met, which would entitle those business owners/employees to park in the CPZ during its operational periods.

In a similar way to resident permits, the Council applies a charge that does not distinguish between a person's/business' ability to afford the charges. Whilst this means that requiring to park in a CPZ during its operational periods would be proportionally be less affordable to those on low income, it would be disproportionate in terms of cost and complexity to operate a means-based cost model.

For those visiting businesses for up to four hours, pay by phone opportunities exist throughout the proposed CPZ in the form of shared-use resident permit/pay by phone bays and shared-use resident permit/business permit/pay by phone bays, which make up the majority of designated parking bays in the CPZ.

It should be noted again that the proposed St Leonard's Central (Zone O) CPZ would not operate on weekday evenings after 6.30pm and on weekends, so costs can be minimised if visitors avoid the operational periods of the CPZ, when parking in the area would be generally free, although it is acknowledged that the operational period is for the majority of the traditional working day, so this may not be possible in many cases.

Other issues raised

2.27 In addition to the general reoccurring feedback subjects, other issues were raised in not so many numbers as follows:

- That parked vehicles would be displaced from the new CPZ into nearby unrestricted roads
- That there would be an overall reduction in space/that residents would no longer be able to park across the vehicle crossovers outside their properties
- That the CPZ would impact on the streetscene
- Querying the pay by phone stay periods

Officer response

The issues of displacement and potential reduction of spaces has been/will be addressed elsewhere in this report. With regards to the streetscene concerns, legislation (Traffic Signs Regulations and General Directions 2016) along with associated guidance sets out how enforceable on-street traffic/parking measures should be signed. Although there are other less intrusive methods of signing, such as Permit Parking Areas, the use of these are however limited to certain road layouts, and are less flexible in who is allowed to park in them. In the case of CPZs which are designed to cater for a number of users, ultimately the road markings and signage are necessary in order to advise motorists what restrictions are in place, and for parking enforcement to take place against contravening motorists.

With regards to the pay by phone stay periods, they have been designed to cater for short-term/medium stays, without compromising the effectiveness of the relevant CPZs by enabling those motorists wishing to stay all day the ability to do so in local roads. Accordingly, within the two-hour CPZ, a one-hour stay is allowed, whereas in the CPZ that operates for ten hours, a four-hour stay is considered appropriate.

2.28 In addition, road-specific comments were received as follows:

2.29 Conyer's Road

- That the proposed yellow lines at the Conyer's Road/Potters Lane junction should be reduced/removed in order to provide additional parking (one mention)
- That the proposed parking spaces between Empire Arches and in front of the old Waterworks should be one-hour free parking (one mention)

Officer response

The proposal includes double yellow lines along Potters Lane, and at the Conyer's Road/Potters Lane junction in order to address traffic movements - which may entail large vehicles - visiting/leaving the industrial areas at the end of Potters Lane, as well as the more residential vehicular movements associated with Brunswick Mews - a private road off Potters Lane. In this case, although vehicles may be currently parked along Potters Lane, bearing in mind the Council's responsibilities under Sections 45(3) and 122 of the Road Traffic Regulation Act 1984 (RTRA) to consider both the interests of traffic and those of the owners and occupiers of adjoining properties, the need for maintaining the free movement of traffic, the need for maintaining reasonable access to premises, to secure the expeditious, convenient and safe movement of vehicular and other traffic including pedestrians, and the provision of suitable and adequate parking facilities on and off the highway, it was considered that parking along this length may create safety and traffic flow issues, and measures have been incorporated within the CPZ design to deter such parking of vehicles.

With regard to the request for free one hour parking, in the main free parking is not part of the design of the CPZ, there will be parking bays that offer short and medium term parking (shared-use bays) in close vicinity to Empire Arches.

2.30 Gleneagle Road

- That the length of double yellow line near the top of the road should be reduced (one mention)
- That a vehicle crossover was not shown on drawing (one mention)

Officer response

As part of the design of the CPZ, a double yellow line outside Nos. 22, 24 and 26 is proposed to be removed and replaced with a shared-use resident permit, business permit and pay by phone bay. Furthermore the vehicle crossover has now been added to the CPZ drawing, although it should be noted that there was no impact on the parking layout, as a yellow line was already proposed at the location in question.

2.31 Rydal Road

- That there would be a reduction in spaces, particularly outside Nos. 2, 4, 14 and 18

According to the Traffic Signs Regulations and General Directions 2016, a CPZ is an area comprising a prohibition of waiting by all vehicles (indicated by yellow lines). It may include designated parking places. Accordingly, all kerbside space within a CPZ, not marked out as a parking bay, or where there is a crossing, or where there is a restriction on stopping, must be marked out by a yellow line.

As it stands, parking bays are provided where it is considered safe and appropriate for motorists to generally park their vehicles, which does not include across vehicle crossovers, and accordingly by law, yellow lines must be introduced along those lengths.

It is acknowledged that due to the proposed CPZ layout of Rydal Road, that less parking bays have been proposed in comparison to how many and where vehicles are usually parked. This is mainly due to the number of vehicle crossovers in the road, and their proximity to each other, which impacts on the Council's practice in providing a minimum length of five metre bay with a safety margin from vehicle crossovers of one metre – hence requiring a total length of seven metres between crossovers.

Officers have noted the concern and have revisited Rydal Road to establish whether any concession could still be safely made on the usual practice, in order to provide additional parking bays, and can confirm that no additional bays can be provided in the locations mentioned. If the on-street layout changes, through vehicle crossovers being made redundant or being relocated, the position can be reviewed through an ad-hoc parking programme which takes place 2-3 times a year.

The proposed St Leonard's Central CPZ would not operate on weekdays before 8am and after 6.30pm and also on weekends, so motorists would be able to park on the single yellow lines at these times.

2.32 Riggindale Road and Rydal Road

It should be noted that the objections outlined in paragraphs 2.23 (that there is no problem/no need for a CPZ), and 2.26 (that the low response rate to the stage 1 consultation is not representative of the community's views/that the stage 1 consultation results were not in line with the proposal) are particularly noteworthy in respect of Riggindale Road and Rydal Road, as it is acknowledged that the stage 1 consultation feedback from these roads indicated a preference for no CPZ.

In the case of Riggindale Road, 18 mentions were made that CPZ was not needed/that there was no parking problem, and 12 mentions questioning the analysis of the stage 1 consultation. From Rydal Road, there were five mentions and six mentions respectively.

Whilst the most consensual response to the stage 1 consultation results, and noting the objections received to the proposed inclusion in the St Leonard's Central (Zone O) CPZ, would be to omit Riggindale Road and Rydal Road from the proposed Zone O CPZ, experience has shown that when a road without parking controls is just outside a new CPZ, displacement parking can occur and this can apply equally to commuter-parking and to local residents unwilling or unable to purchase a parking permit for their own vehicles.

The impact of displaced parking could be quite severe for some residents of Riggindale Road and Rydal Road. Their ineligibility to purchase a resident permit for the new adjacent CPZ, combined with the roads' geographical location, would mean that when no parking space is available on these uncontrolled roads, residents 'whose cars or visitors' cars must be parked on-street would be forced to park some distance away. Their nearest available all-day parking would be west of the railway line in the London Borough of Wandsworth (e.g. Aldrington Road and North Drive) or east of Streatham High Road; which would be over 500 metres (eight minutes' walk) away.

Due to this lack of practical alternative all-day parking in the immediate vicinity it is recommended to proceed with the introduction of controls on both Riggindale Road and Rydal Road as proposed.

Recommendation

It is recommended that the St Leonard's Central (Zone O) CPZ be introduced as proposed.

Proposed Stanthorpe Triangle (Zone U) CPZ – Statutory Consultation objections and comments

2.33 A total of 17 representations logged as originating from and/or regarding the proposed Stanthorpe Triangle CPZ area, were received to the statutory consultation. Of these, 11 were objections, and six were in support of the proposals. A road-by-road summary is shown in Table 4. Additional representations may have been received regarding the proposed Stanthorpe Triangle (Zone U) CPZ, where the origination or subject was not stated or clear, or where the representation covered multiple issues – these are covered in the *Location/origination not stated or general issues raised - Statutory Consultation objections and comments* section.

Table 4 – Distribution of feedback – proposed Stanthorpe Triangle (Zone U) CPZ

Road name	Object	Support	Comment	Total
Ashlake Road	1	1	-	2
Bournevale Road	-	2	-	2

Gleneldon Road	5	2	-	7
Shrubbery Road	2	-	-	2
Stanthorpe Road	2	1	-	3
Not stated	1	-	-	1
Total	11	6	-	17

2.34 The feedback was varied in nature, although similar to the other proposed CPZs the most prevalent were comments that could be considered general or reoccurring across this proposed CPZ, which are listed as follows, with a list of the representations. The details of these representations received and a summary of their origin in Appendix E:

2.35 *That the costs of permits will be a financial burden on residents; that the proposals are a money-making exercise; that the costs are additional taxation to motorists/residents (five mentions)*

Officer response

The Council's Transport Strategy and its Air Quality Action Plan make clear that it will use CPZs to encourage the use of more sustainable modes of transport such as walking, cycling and public transport and to encourage the use of less polluting vehicles.

The current Secretary of State's Guidance on the introduction of a CPZ is that a scheme needs to be self-financing. This means that in order to cover the cost of implementing and enforcing the CPZ, the Council must charge for parking during controlled hours. In common with other highway authorities, the Council applies a fixed tariff that does not distinguish between a person's ability to afford the charges. Whilst this means that requiring to park in a CPZ during its operational periods would be proportionally be less affordable to those on low income, it would be disproportionate in terms of cost and complexity to operate a means-based cost model. Lambeth's pricing structure for parking permits for residents' vehicles offers a sliding scale of charges according to the vehicle's carbon dioxide (CO₂) tailpipe emissions.

Given that the proposed Stanthorpe Triangle (Zone U) CPZ would only operate for two hours on a weekday, the cost to residents can be minimised if their visitors and tradespeople avoid the controlled hours (i.e. visit before 12 noon, after 2pm or at weekends). Where this is not possible, residents would be able to purchase up to 50 visitor permits a year at a cost of £5.58 a day or £24.50 for a book of five permits (noting that permit costs are subject to change).

2.36 *That the low response rate to the stage 1 consultation is not representative of the community's views/That the stage 1 consultation results were not in line with the proposal (three mentions)*

Officer Response

As detailed in paragraph 2.1, the council made considerable efforts to consult everyone potentially affected by the proposals. From experience when consulting on traffic or parking proposals using letters individually addressed to householders of premises within the affected area, a typical response rate is between 9-12%. The response rate of 8% to the stage 1 consultation was therefore slightly less than expected. Higher response rates may have been achievable by 'door-knocking' those properties that have not responded to the consultation, but this was not considered proportionate to the information that such an exercise would glean.

With regards to the analysis of the stage 1 consultation, overall, the feedback indicated that the majority were in favour of a Monday to Friday, 2-hour CPZ in the Stanthorpe Triangle (Zone U) CPZ. However, the majority of respondents from Stanthorpe Road considered that they did not have a parking problem, were opposed to the introduction of a CPZ in their road; and would not reconsider if a CPZ were to be introduced in adjacent roads.

However, it was considered that if a CPZ was not proposed in Stanthorpe Road, that the road could be negatively impacted upon if the CPZ were to be introduced in neighbouring roads, particularly given its location, where it would be bounded by red route/CPZs to the north and west, and by a railway line to its south. Such a scenario could potentially result in displacement into the road, as well as offering the residents of these road, limited opportunity to park in alternative locations, as they would not be eligible for permits for the surrounding CPZs.

Other issues raised

2.37 In addition to the general reoccurring feedback subjects, other issues were raised in not so many numbers as follows:

- that there would be an impact on businesses
- that parked vehicles would be displaced from the new CPZ into nearby unrestricted roads
- that there is no parking problem in the area
- That there would be an impact on visitors/contractors
- that there would be an overall reduction in space
- Querying the proposed pay by phone/resident permit layout

Officer response

The issues of impact on businesses, visitors, displacement and potential reduction of spaces has been/will be addressed elsewhere in this report. The results of the stage 1 consultation were used to establish whether the community felt there were parking issues in the area - the proposals have been very much led by the feedback to that consultation.

With regards to the pay by phone/resident permit bay 'mix', it is considered that shared-use parking should be sufficient to cater for the resident demand, whilst still allowing visitors to the area the ability to park where they need to park.

Recommendation

It is recommended that the Stanthorpe Triangle (Zone U) CPZ be introduced as proposed.

Location/origination not stated or general issues raised - Statutory Consultation objections and comments

2.38 A total of 20 representations were received from members of the public about the proposals, where their specific origination or which CPZ being raised was not clear, or where the respondent was discussing multiple issues/locations; or where Officers considered the content were general/multiple issues which could be applied across various areas. Of these representations, 15 were objections and 5 were in support of the proposals.

2.39 The feedback was varied in nature, although some issues that were raised could be considered as general or reoccurring across the proposed CPZs as follows:

2.40 *That the costs of permits will be a financial burden on residents; that the proposals are a money-making exercise; that the costs are additional taxation to motorists/residents (10 mentions)*

Officer response

This issue along with Officer response has been covered elsewhere in this report in respect of the proposed St Leonard's North (Zone I) CPZ in paragraph 2.8; the proposed St Leonard's Central (Zone O) CPZ in paragraph 2.24; and the proposed Stanthorpe Triangle (Zone U) CPZ in paragraph 2.35.

2.41 *That the proposed CPZ would have a negative impact on local businesses (5 mentions)*

Officer response

This issue along with Officer response has been covered elsewhere in this report in respect of the proposed St Leonard's North (Zone I) CPZ in paragraph 2.9; the proposed St Leonard's Central (Zone O) CPZ in paragraph 2.26; and the proposed Stanthorpe Triangle (Zone U) CPZ in paragraph 2.37.

2.42 *That there is no current parking problem/that there is no need for a CPZ (5 mentions)*

Officer response

This issue along with Officer response has been covered elsewhere in this report in respect of the proposed St Leonard's North (Zone I) CPZ in paragraph 2.11; the proposed St Leonard's Central (Zone O) CPZ in paragraph 2.22; and the proposed Stanthorpe Triangle (Zone U) CPZ in paragraph 2.37.

2.43 In addition to the main reoccurring feedback subjects, other issues were raised in not so many numbers as follows:

- that there would be an impact on visitors/contractors
- that there would be an impact on teachers
- that there would be a potential loss of gardens through residents creating driveways
- that the proposed CPZ hours are too long
- that there would be an overall reduction in parking space – citing Woodfield Avenue, Woodbourne Avenue and Hoadly Road as examples
- that there appears to be a “one size fits all” approach to the CPZ design based on ward boundaries
- that the Council are not aware of its legal duties in respect of providing suitable and adequate parking facilities on and off the highway
- that there are teacher parking issues related to Streatham and Clapham High School including teacher parking and whether the proposed CPZs would address them, particularly in respect of there being no proposed resident only bays.
- That the CPZ drawings were out of date due to a junction improvement scheme at the junction of Woodfield Avenue, Abbotswood Road which resulted in the loss of parking

Officer response

The issues of impact on visitors/contractors, CPZ hours being too long, and reduction of spaces have been addressed in various paragraphs elsewhere in this report (paragraphs 2.12, 2.13, 2.16, 2.17, 2.23, 2.27, 2.37), as have the issues relating to teacher parking and the Streatham and Clapham High School (paragraph 2.15 and 2.17).

Concerns about reduction of parking spaces in Hoadly Road has been addressed in paragraph 2.17 and it is considered that the content and the principle of the Officer response would also apply for Woodfield Avenue and Woodbourne Avenue.

Officers are aware of the Council’s legal responsibilities in terms of providing suitable and adequate parking facilities on the and off the highway, and the content of paragraphs 4.1 to 4.19 of the 23 April 2021 Officer Delegated Decision report entitled “Proposed Controlled Parking Zones in St Leonard’s and Streatham Vale (Stage 1 Consultation results)” states how it is considered these responsibilities are met.

In response to the “one size fits all” comment, in the design of CPZs, there will always be some consistent aspects throughout a particular area, such as the CPZ hours of operation and type of parking bays/restrictions utilised as this helps with community and motorist clarity. It should be noted that the proposed CPZ does not cover the entirety of the St Leonard’s ward and furthermore the proposal includes three separate CPZs with two differing operational periods. It should also be noted that the formation of the proposed CPZ was primarily based on the informal consultation results, which were summarised in the 23 April 2021 Officer Delegated Decision report entitled “Proposed Controlled Parking Zones in St Leonard’s and Streatham Vale (Stage 1 Consultation results)”. Furthermore, Officers also design CPZs and parking restrictions in consideration of the local environment, as opposed to following a ‘one size fits all’ approach. In some cases, CPZs will extend to ‘quieter’ roads in order to mitigate against any displacement that may occur if the CPZ covered a smaller area.

The concern about the potential loss of gardens has been noted, although this cannot be quantified as it stands as the CPZ is not in place, and there is not an automatic link that Officers are aware of between CPZs being introduced and vehicle crossovers/driveways being created. It should be noted that as part of the Council’s ongoing duties, residents can apply for a vehicle crossover at any time, if they wish to create a driveway on their property, and the application will be considered on the merits of the actual application/location, noting that the construction of a vehicle crossover and construction of a driveway would cost considerably more than a parking permit currently does.

Officers have also noted the revised junction and parking layout at the junction of Woodfield Avenue and Mount Ephraim Lane and note that a public realm scheme has been introduced between the scheme being designed and statutory consultation taking place. This scenario where changes to the kerbside space within a proposed CPZ area occasionally happens. The Council’s processes have built-in quality assurance to ensure such issues are identified and corrected prior to the introduction of the scheme.

Outside of the proposed CPZs – Statutory Consultation objections and comments

2.44 A total of 24 representations originating from outside the proposed St Leonard’s North (Zone I), St Leonard’s Central (Zone O) and Stanthorpe Triangle (Zone U) CPZ areas, was received, of which 23 were received from properties falling within the St Leonard’s South X and Streatham Vale West Y areas. Of the total of 24, 21 were objections, and three were comments/representations identified neither as an objection nor in support of the proposals. A road-by-road summary is shown in Table 5.

Table 5 – Distribution of feedback – comments originating from outside the proposed CPZs

Road name	Object	Support	Comment	Total
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Abercain Road	1	-	-	1
Hambro Road	1	-	-	1
Lewin Road	1	-	-	1
Natal Road	2	-	-	2
Pathfield Road	15	-	3	18
Out of borough	1	-	-	1
Total	21	-	3	24

2.45 The most prevalent issues in terms of the feedback were comments that could be considered general or reoccurring across these areas, as follows:

2.46 *That parked vehicles would be displaced from the new CPZ into nearby unrestricted roads (17 mentions)*

Officer Response

Displacement of some parking is unfortunately unavoidable when introducing any parking controls. Some non-residents, who have previously been able to park on-street for free and for whom public transport or other more sustainable modes are either not available or considered inconvenient, may migrate to adjacent and nearby unrestricted streets. Given the proximity of the streets of concern to Streatham Common Station, and to a certain extent, to Streatham Station it is acknowledged that there may be a knock-on impact on these streets.

In addition, a small proportion of residents living within the proposed CPZ, may not be prepared to purchase a parking permit and so also may migrate to where on-street parking remains free of charge. However, this is considered to be less of an issue for the areas of concern, as due to the road layout, and the natural boundaries of railway lines separating the proposed CPZs from the St Leonard's South X and Streatham Vale Y areas, would make the walk-distance unattractive for residents.

It should be noted that the areas of particular concern, St Leonard's South X and Streamham Vale West Y areas, were subject to the stage 1 consultation, however there was no support across the areas overall for CPZs to be introduced, whether or not adjacent roads were also included in a CPZ.

2.47 *That a CPZ should be introduced (16 mentions)*

Officer response

The Stage 1 consultation results influenced whether the proposed CPZs should go ahead and in the case of the St Leonard's South X area, 52.4% of respondents felt that they did not have a parking problem in their road and 40.4% felt they did. In response to whether the recipient would support introduction of a CPZ in their road, 62.5% said that they would not, and 29.8% said that they would. However, when asked if they would reconsider and support the introduction of a CPZ in their road if adjacent streets were to be included in a CPZ, 38.9% of respondents indicated that they would, while 48.1% still opposed a CPZ.

In the Streatham Vale West Y area 53.4% of respondents felt that they did not have a parking problem in their road and 39.8% felt they did. In response to whether the recipient would support introduction of a CPZ in their road, 63.1% said that they would not, and 30.1% said that they would. However, when asked if they would reconsider and support the introduction of a CPZ in their road if adjacent streets were to be included in a CPZ, 37.9% of respondents indicated that they would, while 52.4% would still oppose a CPZ.

Accordingly, as the responses appeared to indicate an overall rejection of a CPZ, no CPZs were proposed for these areas. However, when the stage 1 consultation results are broken down, in St Leonard's South X only the majority of Natal Road and Pathfield Road respondents considered that they had a parking problem. Pathfield Road residents alone were in favour of the introduction of a CPZ in their road; and residents of Natal and Pathfield Roads were in favour of a CPZ if a CPZ was to be introduced in adjacent roads.

In Streatham Vale West, the majority of respondents of Abercairn Road, Aberfoyle Road and Carnforth Road said they had a parking problem, with the majority of respondents of Abercairn Road and Carnforth Road stating they supported a CPZ being introduced in their road from the outset, and if adjacent roads were included.

It should be noted that the majority of mentions requesting a CPZ during the statutory consultation was received by Pathfield Road residents (13 mentions), whilst there was one mention each originating from Natal Road, Hambro Road and Lewin Road. Officers sympathise, as from the outset the Pathfield Road and Natal Road respondents appear to have been in favour of a CPZ, however after the Stage 1 consultation it was considered that each of the areas consulted should be considered as a whole, and certainly in this case, there would be issues in considering isolated single-road CPZs to meet the localised demand.

In addition, it should also be noted that in July 2019 approval was obtained for a five-year investment programme focusing on the introduction of potential controlled parking in roads to the south of the borough. Although the first phase of this programme – the Stage 1 consultation with properties in St Leonards ward and part of Streatham South ward (Streatham Vale West) has taken place as described in this report, there may be opportunity to revisit this area as part of the future programme – particularly if additional roads in the Streatham South ward will be under investigation.

Proposed waiting restrictions

2.48 13 objections to the proposed waiting restrictions in the St Leonard's South X and Streatham Vale West Y areas were received, all of which specifically focussed on the proposals for Pathfield Road.

The objections focussed on a few prevalent issues:

- That the proposed waiting restrictions would reduce the amount of kerbside space utilised for parking in a street with high parking demand
- That a recently introduced Traffic Management Scheme in Pathfield Road has resulted in new waiting restrictions being no longer necessary
- That there is no need for, or benefit to, the proposed waiting restrictions on the bend near Nos. 125 to 129

Officer Response

It is acknowledged that the proposed waiting restrictions would reduce the amount of kerbside space utilised for vehicles to park, however the restrictions were proposed in order to minimise the risk of parked vehicles causing unreasonable highway obstruction, to the detriment of motorists and pedestrians alike.

In the case of Pathfield Road, it is acknowledged that the proposals would exacerbate what some residents of the road consider an intolerable parking situation, due to the various parking demands associated with the road's proximity to Streatham Common Station.

In addition, a Traffic Management scheme was introduced in Pathfield Road in July 2020, where motorists travelling eastwards along Pathfield Road and northwards on Rotherhill Avenue, are now prohibited from proceeding along Pathfield Road east of its junction with Rotherhill Avenue.

As part of this scheme, additional 'at any time' waiting restrictions (double yellow lines) were introduced, reducing approximately nine vehicles' worth of parking availability.

Although the road remains a two-way street, the principle of this scheme appears to seek to reduce eastbound traffic towards the Pathfield Road/Greyhound Lane junction, and thus reducing the occasions that opposing motorists need to pass each other – particularly in the eastern section (between Rotherhill Avenue and Greyhound Lane) of the road. Some of the respondents to the statutory consultation have commented that the scheme has improved travel in the road, and has made the road quieter, which they are thankful for.

Given that the Traffic Management Scheme has already introduced significant lengths of double yellow lines along the road and has changed the use of the road, it is considered that the waiting restriction proposals for Pathfield Road should not proceed at this time, and accordingly, the overall proposals for waiting restrictions in the St Leonard's South X and Streatham Vale West Y areas should proceed with the modification that those proposed in Pathfield Road should be abandoned.

Recommendation

It is recommended that the proposed waiting restrictions in the St Leonard's South X and Streatham Vale West Y Areas be introduced as proposed, albeit with the following modifications:

- *That the proposals for waiting restrictions in Pathfield Road are abandoned*

Proposed Electric Vehicle recharging bays

2.49 No comments or objections were received to the proposed Electric Vehicle recharging bays, and it is therefore considered they be introduced as proposed.

Representation received by the Metropolitan Police for entire consultation area

2.50 No representations were received.

Ward Councillor comments

2.51 The St Leonard's and Streatham South Ward Councillors were made aware of the proposals prior to the consultation and when the consultation started, and have been sent a draft of this report. No comments have been received about the proposals, or the feedback, comments and recommendations outlined in this report.

3. FINANCE

- 3.1 The forecast cost of progressing the proposed schemes to implementation is detailed in Table 2. All expenditure is capital:

Table 6 - Forecast Expenditure

Project task	2021/22 (£)
Legal costs (writing and advertising traffic orders, etc)	7,000
Implementation cost	116,200
contingency	12,300
TOTAL	135,500

- 3.2 It is recommended that provision for this expenditure is drawn down from the 2021/22 allocation to the Parking theme of the Capital Investment Programme.
- 3.3 As required by the Secretary of State's Statutory Guidance to Local Authorities on the Civil Enforcement of Parking Contraventions, the objective of civil parking enforcement should be for 100 per cent compliance. Accordingly, cost models for CPZ must assume that no penalty charges will be issued. If the Council does make a surplus on its on-street parking charges and enforcement activities, it must use the surplus in accordance with the legislative restrictions in Section 55 (as amended) of the Road Traffic Regulation Act 1984.

4. LEGAL AND DEMOCRACY

- 4.1 With the following additions, the legal implications remain as stated in the 23 April 2021 Officer Delegated Decision report entitled "Proposed Controlled Parking Zones in St Leonard's and Streatham Vale (Stage 1 Consultation results)"
- 4.2 Section 87 of the Traffic Management Act 2004 stipulates that the Council must have regard to the information contained in 2016's, "The Secretary of State's Statutory Guidance to Local Authorities on the Civil Enforcement of Parking Contraventions" published in 2016. This sets out the policy framework for Civil Parking Enforcement. It explains how to approach, carry out and review parking enforcement. It attempts to strike the balance between
- as much national consistency as possible, while allowing parking policies to suit local circumstances; and
 - a system that is fair to the motorist, but also effective in enforcing parking
- 4.3 If the Recommendations are approved and a Traffic Management Order (TMO) is made, a person may decide to challenge its validity on the grounds that (a) it is not within the relevant powers, or (b) any of the relevant requirements has not been complied with in relation to the Order. Application must be made to the High Court within six weeks of the date of the making of the TMO. However, the court can only quash a TMO if satisfied that the order, or any provision of the order, is not within the relevant powers, or that the interests of the applicant have been substantially prejudiced by failure to comply with any of the relevant requirements.
- 4.4 This report fulfils the requirement in the Council's Constitution whereby authority to consider objections received from statutory consultation as part of the TMO making process and the power

to make, amend or revoke traffic orders, following the consideration of such objections is delegated to Directors and Assistant Directors (Delivery).

- 4.5 The decision maker is obliged to take account of material representations received before an Order is made. All representations received must be properly considered in the light of administrative law principles, Human Rights law and the relevant statutory principles. The 1996 Regulations provides for the holding of a public inquiry in connection with a decision to approve, modify or abandon a TMO. The purpose of such an inquiry would be for the proposal to be examined and for the public to be given the opportunity to make their views known in a public forum. The Council is only obliged to hold a public inquiry if the proposal relates to the prohibition of loading and unloading of vehicles of any class in a road on any day of the week (i) at all times, (ii) before 0700, (iii) between 1000 and 1600 hours, or (iv) after 1900 hours and an objection has been made to the proposed order; or the order relates to the prohibition or restriction of passage of public service vehicles. In all other cases, the decision maker may determine at his discretion whether to hold a public inquiry before making an order and may wish to do so where it is considered that this would provide information that would assist the Council in reaching a decision.
- 4.6 The Council’s Constitution requires that all key decisions which involve resources between the sums of £100,000 and £500,000 and important or sensitive issues must be published on the Council’s website for five clear days before the decision is approved by the Cabinet Member or Director concerned (Constitution, Part 2, Section 3). Any representations received during this period must be considered by the decision-maker before the decision is taken.

5. CONSULTATION AND CO-PRODUCTION

- 5.1 The stage 1 and statutory consultations that have informed this report’s recommendations, and responses are described in sections 1 and 2 of this report and responses to the statutory consultation are outlined in Appendices C, D and E to this report.,.
- 5.2 The St Leonard’s and Streatham South Ward Councillors have not specified any objections to this report’s recommendations.

6. RISK MANAGEMENT

- 6.1 With the following additions, the risks associated with introducing and operating a CPZ remain as reported in the 23 April 2021 Officer Delegated Decision report entitled “Proposed Controlled Parking Zones in St Leonard’s and Streatham Vale (Stage 1 Consultation results)”.

Table 7 – Risk

Item	Risk	Likelihood	Impact	Score	Control Measures
1	If the recommendations of this report are not approved, the Council will be unable to mitigate against the existing parking difficulties that some residents experience and will not gain the ability to further deter car-borne commuting in this area.	2	2	4	none

2	If the recommendations of this report are not approved the Council's staff resources allocated to progressing CPZs are fully committed until 2023. This is after ULEZ is scheduled to be expanded to the South Circular. The effect of this expansion may include some commuters who drive non-compliant vehicles but who currently benefit from off-street parking at their workplace inside the South Circular to park just outside the zone in the manner of park-and-ride	2	4	8	none
3	If the recommendations of this report are approved, objectors could feel strongly enough to seek a judicial review. There is a risk of this resulting in an injunction.	4	2	8	See para 4.3

Key

Likelihood	Very Likely	4	Likely	3	Unlikely	2	Very Unlikely	1
Impact	Major	8	Serious	4	Significant	2	Minor	1

7. EQUALITIES IMPACT ASSESSMENT

7.1 The recommended waiting restrictions have been screened for their effect on people with one or more of the protected characteristics. Whilst this screening found there to be a net positive impact on such people (see Appendix G to this report), there is potential for some individuals within two of these protected characteristic groups to be disadvantaged:

- a) Disabled people who do not have a Blue Badge: due to there being more spaces in which to park and no charges being levied, disabled people whose vehicles display a blue badge would be expected to disproportionately benefit from a CPZ. However, people who could be described as disabled from outside the CPZ but who do not qualify for a blue badge and need to visit the area by car (other than to visit a resident) during the controlled period and requiring a stay longer than the maximum period allowed for using Pay-by-Phone may be disadvantaged. In mitigation, the eligibility criteria for a Blue Badge is extensive and designed to capture anyone whose limited mobility defines them under the Equality Act as having a disability. It captures anyone who receives the higher rate mobility component of the Disability Living Allowance; anyone who receives a Personal Independence Payment (PIP) because they cannot walk more than 50 metres; anyone who receives the mobility component of PIP and is categorised as being unable to undertake a journey because it would cause overwhelming psychological stress; anyone who receives a War Pensioner's Mobility Supplement; and anyone who is blind. Whilst the council recognises that there are some people with limited mobility who need a car but do not qualify for a blue badge (for instance those who are recovering from surgery), and who are not recognised as disabled under the Equality Act, there is no duty to consider the needs of such people any differently to those whose mobility is not impaired.
- b) People from outside the CPZ whose faith may require them to attend places of worship inside the CPZ during controlled hours:
 - Islam: the Friday prayer, Jumu'ah, is mandatory for all Muslim males who are of age. Jumu'ah takes place in the early afternoon (i.e. immediately after the proposed CPZ's controlled hours) every Friday at South London Islamic Centre, 8 Mitcham Lane, Streatham, SW16 6NN. The South London Islamic Centre (SLIC) is located in the proposed CPZ, but the majority of worshippers don't drive to the mosque, taking advantage of the excellent accessibility of the site by public transport (the site has a PTAL of 6a). For

those with a disability, Blue Badge holders will continue to be able to park in the area. It's worth noting that SLIC fully supported the proposed hours of the St Leonard's North (Zone I) and Stanthorpe Triangle (Zone U) zones to cover Jumu'ah, i.e. 12.00noon-2pm Monday-Friday, as shown in their letter of support at Appendix N of the 23 April 2021 Officer Delegated Decision report entitled "Proposed Controlled Parking Zones in St Leonard's and Streatham Vale (Stage 1 Consultation results)".

- Judaism: although the South London Liberal Synagogue at 1 Prentis Road, Streatham, London, SW16 1HP is located in the proposed CPZ, the controlled hours would end before sunset on a Friday and do not apply on a Saturday so its introduction should have no direct impact on worshippers.

The EqIA screening has identified people who worship Baha'i, Buddhism, Candomle, Christianity Hinduism, Jainism, Mormonism, Rastafari, Santeria, Shinto, Sikhism, Taoism or Zoroastrianism would not be affected due to either the day of congregational worship being a Sunday (when no restrictions apply) or there being no known place of worship for that religion within the proposed CPZ.

8. COMMUNITY

- 8.1 All road space in a CPZ is managed by the introduction of parking controls. Because parking is only permitted where safety, access and sight lines are not unduly compromised, implementation of this report's recommendations would contribute towards a safer environment for all road users.

9. ORGANISATIONAL IMPLICATIONS

Environmental

- 9.1 On 23 January 2019, Lambeth Council declared a climate emergency. Poor air quality also remains an issue. Lambeth Council's Transport Strategy and Transport Strategy Implementation Plan 2019, which link into the tMayor's Transport Strategy, sets out the guiding principles and high-level objectives in respect of the Council's vision for mobility and accessibility in the borough. One important objective is to reduce emissions that impair local air quality and cause climate change. By deterring car-borne commuting, CPZs align with the Council's [2017-2022 Air Quality Action Plan](#) to reduce air pollution and its ambition for Lambeth to be carbon neutral by 2030. The emissions-based tariff for residents' parking permits will encourage owners to drive vehicles that are less polluting.

Health

- 9.2 The CPZ aligns with the priorities of both the Councils Health and Wellbeing Strategy and Joint Strategic Needs Assessment by reducing congestion and emissions from road transport contributing to improved air quality .

Corporate Parenting

- 9.3 None as a result of this report.

Staffing and accommodation

- 9.4 None as a result if this report. However, if the CPZ were to be implemented, there will be a potential increase of up to 0.5 FTE within the Parking Service's team to process permit

applications, parking challenges and bay suspensions. The new CPZ zone will generate increased administration and require enforcement, estimated to be the equivalent of 1 FTEs (0.5 with the enforcement contractor and 0.5 within the performance and development team).

Responsible procurement

9.5 None as a result of this report; existing supply chains will be used.

10. TIMETABLE FOR IMPLEMENTATION

ACTIVITY	DATE
Publish this report on the Council website (notice of intention to make a Decision)	8 October 2021
Distribute newsletter to residents and businesses within new/extended CPZs and surrounding areas	October 2021
Publish Noting of Making of Traffic Orders	October 2021
Install traffic signs and road markings	October 2021 – January 2022
Zone becomes operational	January 2022

Audit Trail				
Name and Position/Title	Lambeth Directorate	Date Sent	Date Received	Comments in paragraph:
Councillor Mahamed Hashi/Councillor Danny Adilypour	Cabinet Member for Sustainable Transport, Environment and Clean Air	06.10.21	07.10.21	
Venetia Reid-Baptiste, Strategic Director	Resident Services	06.10.21	07.10.21	
Neil Fenton, Assistant Director, Parking, Streetworks and Commercial	Resident Services	06.10.21	07.10.21	
Shannon Consses, Head of Street Management and Service Development	Resident Services	06.10.21	07.10.21	
Simon Phillips, Head of Transport Strategy and Programme	Sustainable Growth and Opportunity	13.07.21	05.08.21	
Hamant Bharadia, Assistant Director of Finance	Corporate Resources	01.10.21	01.10.21	
Jean-Marc Moocarme, Senior Prosecution Lawyer	Corporate Resources	01.10.21	06.10.21	
Wayne Chandai, Democratic Services	Legal and Governance	01.10.21	05.10.21	
Kevin Edger Procurement Category Manager	Corporate Resources	13.07.21	13.07.21	

REPORT HISTORY	
Original discussion with Cabinet Member	Ongoing since July 2018
Report deadline	N/A
Date final report sent	
Part II Exempt from Disclosure/ confidential accompanying report?	No
Key decision report	No
Background information	<p>Lambeth Transport Strategy 2019</p> <p>Lambeth's Air Quality Action Plan 2017-2022</p> <p>ODDR - Proposed Controlled Parking Zones in St Leonard's and Streatam Vale (Stage 1 Consultation results) – 23/04/2021</p>

	<p>https://moderngov.lambeth.gov.uk/ieDecisionDetails.aspx?ID=7822</p> <p>ODDR - Proposed Controlled Parking Zone Consultations – Streatham Area – 04/07/2019</p> <p>https://moderngov.lambeth.gov.uk/ieDecisionDetails.aspx?ID=4374</p> <p>CMDDR – Controlled Parking Zone Expansion Investment Programme 2019 -2023 – 03/07/2019</p> <p>https://moderngov.lambeth.gov.uk/ieDecisionDetails.aspx?ID=4371</p>
<p>Appendices</p>	<p>Appendix A – Detailed Proposals (Statutory consultation drawings)</p> <p>Appendix B – Recommended CPZ measures for implementation (following statutory consultation)</p> <p>Appendix C – Proposed St Leonard’s North (Zone I) CPZ Statutory Consultation correspondence</p> <p>Appendix D – Proposed St Leonard’s Central (Zone O) CPZ Statutory Consultation correspondence</p> <p>Appendix E – Proposed Stanthorpe Triangle (Zone U) CPZ Statutory Consultation correspondence</p> <p>Appendix F – Recommended locations of ‘at any time’ waiting restrictions (double yellow lines) for implementation</p> <p>Appendix G – Equalities Impact Assessment</p> <p>Appendix H – Recommended waiting restrictions measures for implementation (following statutory consultation)</p> <p>Appendix I - Location/origination not stated or general issues raised - Statutory Consultation correspondence</p> <p>Appendix J - Proposed St Leonard’s CPZ and proposed waiting restrictions Statutory consultation correspondence</p>

APPROVAL BY CABINET MEMBER OR OFFICER IN ACCORDANCE WITH SCHEME OF DELEGATION

I confirm I have consulted Finance, Legal, Democratic Services and the Procurement Board, and taken account of their advice and comments in completing the report for approval:

Signature: _____ **Date:** _____

Post: Gavin Woolery-Allen, Senior Parking Engineer, Parking Design Team, Street Management and Commercial

I approve the above recommendations:

Signature: _____ **Date:** _____

Post: Neil Fenton, Assistant Director of Parking, Street Management and Commercial

Any declarations of interest (or exemptions granted): None

Any conflicts of interest: None

Any dispensations: None

Any representations received:

Three representations have been received within five days of the publication of this report.

The representations with Officer comments are as follows:

Representation 1

Further to my email to Mr Morris below, I understand that the CPZ was not approved on 30 September after all, and that the Report has been revised and was republished on 8 October with a decision now due on 18 October.

I note from paragraph 4.6 of the revised Report that any representations received in the 5 days before the decision is made must be considered by the decision-maker before the decision is taken. Therefore, please consider the following representations on your Report:

1. In view of the revelation in the initial Report that Teacher Permit Holders are entitled to park in all shared bays, not just Business bays, and given the substantial loss of parking space in Hoadly Road which I quantified in my representation (Appendix C item 171), I renew my request for some Residents Only bays in Hoadly Road. This is particularly important given the existing competition for on street parking with SCHS Teachers (see below), and insufficient weight has been given in the Report to the parking pressures in Hoadly Road arising from the operations of SCHS.

2. Paragraph 2.15 still grossly under reports the number of staff working at the Streatham and Clapham High School site in Abbotswood Road as 50, when it is actually about 120, which suggests that the Council does not understand the extent of the problems caused by staff parking in Hoadly Road and Abbotswood Road.

Just to be clear, the number of teaching (only) staff is actually 68, and can be found on the SCHS website. <https://schs.gdst.net/> (click on Information and then Our Staff to get the full list of ALL staff employed, teaching and non-teaching). Attached is a summary of the info on the SCHS website.

I gave the correct figures in my own representation in June, so I cannot understand why the figure used in the Report has not been corrected. In relation to actual numbers of staff currently parking in our local residential roads (44-46), I even referred you to the source of my data ie the SCHS Travel Plan Annual Survey 2020, which was formally submitted to the Council's Planning and Transport Officers as required.

3. My own representation about loss of gardens in Hoadly Road has still not been reported. A related issue is touched upon in paragraph 2.43 under the heading "Location/origination not stated or general issues raised" stating that the issue was "that there would be a potential loss of gardens through residents creating driveways". However, this does not apply in Hoadly Road and does not cover my objection. All houses in Hoadly Road already have driveways, so residents can easily use these to fully pave the front gardens to form car parks for 3 or 4 vehicles. As I have stated in correspondence below, the paving over of front gardens DOES NOT need planning permission, so is outside Council control (see below).

4. The Report's denial of a link between introduction of a CPZ and loss of gardens is illogical, when it is an obvious danger in suburban Streatham houses with sizeable front gardens. The inference that we have to wait and see what happens without considering pre-emptive mitigating measures is extraordinary, especially given the Council's declared "Climate Emergency". I also suggested an approach to dealing with this problem in my representation, which has been ignored.

5. The Report states that "residents can apply for a vehicle crossover at any time, if they wish to create a driveway on their property, and the application will be considered on the merits of the actual application/location". This is misleading. It wrongly indicates that the Council has a means of control that can consider the loss of gardens. Please note that hardstandings are 'permitted development' (subject to criteria) and the crossovers associated with 'permitted development' hardstandings are normally also 'permitted development', so neither require Planning Permission. To the best of my knowledge, any consent required under the Highways Acts will address only highway issues eg safety and strength of footway. It cannot consider the "merits" or otherwise of loss of soft landscaped gardens, visual amenity, biodiversity etc. This needs to be explained in the Report, presumably with input from the Planning Department to confirm my understanding of the legal position.

6. The issue I raised of parking by part time SCHS staff using Pay By Phone has also not been addressed, and there is insufficient explanation of why the controlled parking hours in Hoadly Road are 12-2pm rather than 10-12 midday, which I recall was the original proposal. The only explanation in the Report relates to the Mosque in Mitcham Lane (para 2.66), which IS NOT just a short walk from Hoadly Road as suggested - it is a minimum 15 minute walk. Why are the controlled parking hours in Hoadly Road determined by the

traffic and parking impacts of a Mosque nearly 1 mile away, rather than the traffic and parking impacts of Streatham and Clapham High School which is just 30 seconds and 20 metres away!

I request that you consider all the above before a decision is taken.

In terms of the decision making process itself, I am rather surprised that the publication of the Report prior to decision is not actually on the project webpage via the link Mr Morris provided in an email of 27/7/20, www.lambeth.gov.uk/stlcpz . That is where myself and other interested parties would look for updates. I only belatedly found out that the Report had been published first time around by complete chance, on the very date it was due to be approved. Second time around, I was informed by a neighbour. How are interested parties supposed to know that the report has been "published" for final comment, and where to find it? This is not helpful, open or transparent.

When the CPZ consultation was launched, Lambeth Council put out a statement on Twitter saying "We're proposing a CPZ to give residents back their roads". I don't think that this will be the outcome for Hoadly Road residents with the scheme as currently proposed!

This representation has been considered, and the Officer response is as follows:

1. The request for resident only bays outlined in the original representation was noted and this has been considered in this report. It is considered that the issues that were raised in respect of this issue as well as the operation of SCHS has been sufficiently addressed in the report.
2. The sentence of concern in paragraph 2.15 of this report appears to be as follows: "It is understood that these concerns relate to parking activity primarily related to Streatham and Clapham High School where there are reportedly at least 50 staff, many of whom drive to work daily, and park on Abbotswood Road until they leave to go home". It should be noted that the reference to "reportedly at least 50 staff" relates to what has been advised in representations received, as opposed to being the Council's stated tally/view of the staff numbers. The concern about the number of teachers/staff at the school was noted and the general concern about this issue has been addressed in the report.
3. The concern about loss of gardens in Hoadly Road was considered to be an issue which could apply across the CPZ in general. Although this appeared to be a concern, and it is of course a possibility that residents could choose to pave over the remainder of their front garden areas, it is unclear how likely this would be to occur in this instance or that there is an established causal connection between the implementation of CPZ's generally and the paving over of front gardens. It is noteworthy that many properties in Hoadly Road have already paved over the majority of their front gardens.
4. There was no intention to "deny" a link between introduction of a CPZ and loss of gardens, although no specific data has been provided in any representation about this particular issue which would substantiate that claim. Moreover, what we can say is that there is no evidence to show a disproportionate rise in vehicle crossover applications (as the necessary access to a new driveway) as a result of CPZ's being introduced in the borough. For example, within the Streatham Hill East CPZ area, which was introduced in November 2020, 2 vehicle crossover applications have been received in the 11 months since the CPZ commenced.
5. In stating that "residents can apply for a vehicle crossover at any time, if they wish to create a driveway on their property, and the application will be considered on the merits of the actual application/location", the intention was to specify that the provision of a vehicle crossover (which would allow access to an off-street parking area on a property), would be considered upon receipt of an application, which would consider the merits or otherwise, in context of that application process. There was no statement and no intention to suggest that non-vehicle crossover issues would be considered as part of that application process. It should be noted that information on how

to apply for a vehicle crossover is set out on the [Council's website](#) and clearly sets out the 4 stages that must be completed before a crossover can be constructed which are:

- Stage 1 - Obtain permission from the Transport and Highways Department
- Stage 2 – Get planning permission or certificate of lawfulness from the Planning Team
- Stage 3 – Utilities clearance and payment
- Stage 4 – Pay for the construction of the dropped kerb

There are certain instances, as outlined on the [website](#) where planning permission would be required, and in all instances all applications would be required to be approved by Planning by way of either planning permission or a certificate of lawfulness.

6. The issue of pay by phone users was addressed in the 23 April 2021 Officer Delegated Decision report entitled “Proposed Controlled Parking Zones in St Leonard’s and Streatham Vale (Stage 1 Consultation results)” where it considered that pay by phone in the proposed St Leonard’s North ‘I’ and Stanthorpe Triangle ‘U’ CPZs (both 2 hour CPZs) should be a maximum of 1 hour, so to deter non-permit holders from parking all day. Paragraph 2.66 to 2.70 of the same report addresses the consideration to propose 12-2pm CPZs as opposed to 10am-12midday CPZs. It should be noted that the CPZ has been proposed to address the various demands on kerbside space in the relevant area as opposed to seeking to address one particular impact, although the stage 1 consultation process did highlight some issues that were taken into account when fine-tuning the design of the proposed CPZs. With regards to the potential for differential operational periods within the same CPZ, this was raised in respect of Becmead Avenue in the stage 1 consultation, and the Council’s position on this is in Para 2.22 of the Stage 1 consultation results report as follows:

Introduction of different operational hours in Becmead Avenue in isolation to the surrounding streets would enable local commuters an opportunity to avoid controls elsewhere by moving from one area to another. Amending the entire zone to 8am – 9am would also impact residents or their visitors staying over who might not have needed to purchase a permit or pay for parking until midday. In addition, having a 1 hour zone with a 1 hour maximum stay Pay by Phone facility would be open to abuse by commuters. The requested differential parking regime cannot therefore be supported.

Although the above refers to Becmead Avenue, it is of the same view in respect of the potential of other 1 hour or 2 hours CPZ slots in streets in the proposed St Leonard’s North ‘I’ CPZ.

With regards to the publication of the report, this has been done in the Council’s usual way and published at the Council’s usual place on the decision pages of the website. The intention is to update the St Leonard’s CPZ pages once a decision has been definitively made, along with any implementation detail – if the decision was made to progress to implementation.

It should be noted that teachers permits carry a charge which is more expensive than any resident permit. It is hoped that the charging mechanism, which is subject to regular review, results in a change of approach or modal shift from motorists. However if it is evident that residents are negatively impacted in terms of the number of parking spaces and if teacher parking continues to impact residents being able to access the kerbside, then within this report it states that Officers would investigate these issues further through the ad-hoc parking changes programme.

Representation 2

I refer to the St Leonard's Decision Report which has now been published with corrections and amendments to include, as it should have done in the first place, my and other objections and officer responses.

With regard to my "one size fits all" comment the officer has latched on to this expression to misconstrue the comment. From the context and as I made clear enough I was referring principally to application of a CPZ across a wide area, with widely varying parking stresses – the bottom end of Abbotswood and Drewstead, for example, has nothing like the same parking stress as in streets adjacent to Streatham High Road and on the other side of the High Road in Streatham Wells. And yet the same regime is to be applied across this area of St Leonard's principally as a result of pressures along Streatham High Road while on the other side of the High Road, in Streatham Wells Ward, with identical issues no restrictions are to be applied. The officer has avoided answering that.

Officers may now cite Section 122 of the Road Traffic Regulation Act 1984 but the fact remains that when these arrangements were being planned, designed and approved the officer responsible was not aware of his duty under the Act for the Council to provide "suitable and adequate parking facilities". To repeat, the officer wrote to me: "The Council does not have a legal duty to ensure adequate parking facilities."

It is likely that this disregard of the Council's legal duties runs across the authority, including the Planning Department which fails to control, indeed encourages, the loss of garages and off-street parking while permitting the intensification of development without making adequate provision for vehicular parking. Or indeed, taking into account, the simultaneous removal of short-stay shopper bays along the A23 by Transport of London.

The St Leonard's CPZ has been planned and developed without any assessment of parking need or capacity, or quantification of the loss of parking spaces (if the loss has been measured the residents have not been informed). This is unreasonable. I expect that a number of residents will be shocked to discover that bays are being removed because they do not comply with the Council's stringent minimum size standard.

Thus we read several times in the report that the Council will wait until the scheme is introduced before it assesses demand. For example, para 2.17 "It is considered that no additional bays can be provided at this time, although should the CPZ be introduced Officers are inclined to assess the parking demand in the area, before considering whether any additional bays could be provided" or in para 2.15 "Officers are minded to assess the impact of this post-implementation".

With regard to the issue of paving over front gardens, the Council apparently refuses to recognise this issue because it "cannot be quantified". It is simply obvious and common-sense that this happens.

Leaving it to the application process for crossovers to mitigate this problem is also not an answer. First it is not simply an issue of crossovers, which in many cases already exist to serve existing driveways, but also one of residents turning their front gardens into parking lots with zero or minimal vegetation. Second, officers have only very limited powers to prevent this under the planning process since the use of front gardens for parking is permitted development. Lambeth does not restrict it. Even a Scrutiny recommendation (Equality Streets Commission) for a presumption against new crossovers was blocked. The issue was highlighted at least as long ago as 2005 with the GLA report "Crazy Paving".

The decision to apply a 12 to 2 restriction period is highly unusual and we are told is the result of a particular problem in one area of the ward, on a single day of the week. To determine the hours

of operation across large areas of the ward on this basis is unreasonable. There is no evidence of the Council considering, properly or if at all, the impacts of these hours of operation.

It has emerged through reading the objections and responses that resident bays are all, or at least virtually all, to be shared with Pay by Phone users and business, including teacher, permit holders. This appears to be highly unusual. In two other areas chosen at random – Camden and Brighton and Hove – resident bays are what they say they are, resident bays.

The decision to allow teacher permit holders to use resident bays will undoubtedly cause strains in the streets adjacent to and near the school in Abbotswod Road. No doubt similar issues will arise elsewhere in the proposed CPZ area. I don't believe that this aspect of the scheme that was to be introduced in St Leonard's was made clear, or explained at all.

The majority of respondents, 167 to 89, are opposed to the scheme. The Council has cited the low response rate as indicating a low level of concern, and therefore apparently a reason to disregard the vote against. There is little doubt that if the response had been favourable the Council would not be highlighting a low response rate in order to question the validity of the consultation result.

I request that these comments are taken into consideration in the determination of this matter.

This representation has been considered, and the Officer response is as follows:

The issue relating to a “one-size fits all” approach has been addressed in paragraph 2.43 of this report.

The allegation concerning the Council's duties under the Road Traffic Regulation Act 1994 has been addressed at paragraph 2.43 of this report. The view appears to be derived from a comment made in an email by a Council Officer, who had subsequently corrected their statement, but it has continued to be taken out of context. The comment made was meant to suggest that the provision of adequate parking facilities is one of several other matters that the Council need to consider as part of its duties. It is considered that issues raised relating to the loss of garages and off-street parking are aspects which sit outside the scope of this report. How such matters are regulated are matters of separate, established council policy which can be found [here](#).

The design of the proposed St Leonard's CPZ has been subject to two consultations with the public, and following the first stage consultation, changes to the proposed layout to provide additional parking bays were made, as mentioned in paragraph 2.17. The changes were based on feedback from members of the public. It is considered that if other residents took note of the consultations as this resident has done, they would not be shocked at the planned parking layout, noting that no bays are proposed to be removed - rather bays may not be introduced where some motorists may have become accustomed to parking. In any case, Officers are satisfied, based on the data that it holds, that resident parking demand will be met through the parking bay provision in the streets of concern. However, it should also be noted that if it is evident that residents are negatively impacted in terms of the number of parking spaces, and if teacher parking unreasonably impacts residents being able to access the kerbside, then within this report it states that Officers would investigate these issues further through the ad-hoc parking changes programme.

The issue of the potential paving over of front gardens as a result of CPZ introduction was also addressed in paragraph 2.43 of this report. There was no intention to refuse to recognise the issue, although no specific data has been provided in any representation about this particular issue that would substantiate the claim that CPZs result in increases in paving over of front gardens. It is noteworthy that in some roads within the proposed CPZ area many front gardens have been paved

over the entirety of their front gardens. Moreover, what we can say is that there is no evidence to show a disproportionate rise in vehicle crossover applications (as the necessary access to a new driveway) as a result of CPZ's being introduced in the borough. For example, within the Streatham Hill East CPZ area, which was introduced in November 2020, 2 vehicle crossover applications have been received in the 11 months since the CPZ commenced

The decision to apply a 12noon to 2pm restriction period was made and addressed in the Officer Delegated Decision report entitled "Proposed Controlled Parking Zones in St Leonard's and Streatham Vale (Stage 1 Consultation results)" in that the majority of roads in the St Leonard's North '1' CPZ in the stage 1 consultation preferred a 2-hour (then indicated as 10am to 12noon) restriction, however following feedback and engagement in that Stage 1 consultation period it was considered that a 12noon to 2pm restriction would be beneficial as this would address any parking demands associated with visitors to the local Mosque. If there were specific concerns from the community about these operational periods, it is considered that the statutory consultation on the proposed CPZs would have elicited them. Accordingly, it is considered that the principle of a 2-hour restriction has been accepted by the community by way of the Stage 1 consultation, and there has been a lack of overall concern over the proposed operational periods in the statutory consultation.

The issue regarding teachers parking and the concern about parking associated with Streatham and Clapham High School and nearby streets has been addressed in paragraphs 2.15 and 2.17 of this report.

It should be noted that teachers permits carry a charge which is more expensive than any resident permit. It is hoped that the charging mechanism, which is subject to regular review, results in a change of approach or modal shift from motorists. However if it becomes evident that residents are negatively impacted in terms of the number of parking spaces available to them and if it is established that teacher parking unreasonably impacts residents being able to access the kerbside, then, as explained in the report, Officers would investigate those issues further through the ad-hoc parking changes programme.

With regard to the number of respondents, this is addressed in paragraphs 2.4 and 2.5 of this report. To reiterate, the purpose of statutory consultations is to elicit comment and objections to a defined proposal, it is not intended to operate as a referendum/vote. It is also important to point out that in accordance with established law the authority has had conscientious regard to the product of that exercise and refutes any allegation of not having had such regard.

Representation 3

Thank you for your work on the scheme. Many here in Hoadly Rd welcome the CPZ, we see it as a mechanism for controlling car use and protecting local communities, as well as giving the council some additional funds at a time when they are especially needed. We support the principle.

But I feel I too need to reiterate some realities about the impact of the CPZ you are planning on our street, despite a significant amount of feedback on this from those that actually live in the streets. We feel that, in practice, it will have a very detrimental impact on the street gardens, actually prevent one of its aims of letting residents park near their homes, and, perhaps even worse, go contra to Lambeth's (and The World's) aim of reducing travel by non-sustainable cars, using fossil fuels.

1) Destroys street gardens and biodiversity

Your plans take away a significant amount of on-street parking from those who live in Hoadly Rd. Being family houses, many with multi-generations and extended families, most have more than one car, one they park on their driveway, one on the road, often parents both work and older children may be driving to education or work. Your plans will now push many households to attack their front garden areas and pave them over, completely destroying the floral signature of the front gardens in Hoadly Rd, but perhaps more importantly the biodiversity of fauna that lives there. In addition, as you will know, removing a huge amount of soak away soil and lawns for rain water will impact the ability of our local drainage system to manage during heavy rain fall as shown by the flooding recently in London. How can you design a scheme that is so clearly going to transform the look of the front gardens of Hoadly Rd and contribute to further destruction of its flora and fauna?

2) Contradicts one of its aims of helping residents to park near their homes

As noted by XXXXXXXX, residents already have to fight for on street parking with our local private school's staff, teachers and visitors, since SCHS decided to remove off street parking from its Abbotswood Rd site. Now nearly 50 cars "visit" each day, early in the morning, to secure parking. What is worse, is that these car numbers have increased hugely in recent years, despite condition 17 of 14/01361 requiring SCHS to REDUCE the number of cars to the site. However, years of misrepresenting the situation to Lambeth and harassing residents who complain has meant that now near 50 cars come each school day. Your plan to give them equal access to ALL onstreet parking in Hoadly Road means that they could take every parking space, so PREVENTING residents from parking near their homes. Why have you not allowed council tax paying local residents "Resident Only" bays. I hear it is because some residents have off street parking, but can't you see how you are penalising every resident in Hoadly Rd at the advantage of visiting traffic, that per condition 17, says shouldn't be there. How can you promote a scheme that is so clearly going to produce the opposite of one of your main, claimed aims?

3) Encourages travel by non-sustainable, fossil fuel, cars

Another way of looking at this is that your parking scheme will continue to act as an attraction to encourage the school's staff, teachers and visitors to drive every day to the site. How can you justify designing a scheme that actually encourages huge amounts of travel by non-sustainable, fossil fuel cars across London to a place of work, just because there is ample parking there. SCHS's Travel Plan per condition 17 of 14/01361 set targets to maintain staff car journeys to 25+10% of the staff roll call at the time – see below. The current staff total is around 120, but when the targets were agreed the staff roll was less than 100 and it is this total that should be used. So the total number of expected staff driving to the site should be 35: it is currently near 50 per SCHS's own unaudited travel survey shared with Lambeth's Planning and Transport Officers. You issuing unlimited teacher permits will support this behaviour and may even encourage more staff to drive to 42 Abbotswood Rd. This seems to completely contradict all the encouraging "green" messages coming out of Lambeth's Climate Action team: "Last week, Lambeth truly turned green Lambeth Citizens' Assembly members presented their recommendations at full council , calling on the borough to tackle the climate emergency fairly, effectively and quickly. The next step is developing these into a Climate Action Plan." How do you reconcile this? One team at Lambeth encouraging non-sustainable travel and the other criticising it and planning to restrict it. How is this private school still allowed to have such a high percentage of parents and staff driving every day to its site, when there is perfectly good cleaner public transport options available. Shouldn't the management of SCHS be setting a better example to the Young of today who are being left to grow up on this polluted planet? I believe each year group has Climate Change Reps, perhaps they should start with banning all driving to school.

Please reconsider

Is this really the legacy that you want for your CPZ scheme, to destroy the look of the front gardens of Hoadly Rd and contribute to further destruction of flora and fauna, to hard it very hard for residents to park near their homes and actually to encourage visiting traffic to the community? Please will you:

- 1. Review the allocation of your parking bays and provide Hoadly Rd with a significant amount of "Resident Only" bays?*
- 2. Restrict the allocation of teacher permits at SCHS to 35. SCHS can determine how it allocates them to make sure that those that HAVE to drive, can, but to discourage those that don't have to and shouldn't be driving. Alternatively you may feel that 35 cars driving every day across London, or further afield, to visit 42 Abbotswood Rd is too many and restrict the number of teacher permits even more.*

Rather than your claim to "give residents back their roads", sadly we feel that the reality of the scheme you are now proposing will be the final act to take "our Hoadly road" away from us residents completely .

This representation has been considered, and the Officer response is as follows:

The concern about loss of gardens was addressed at paragraph 2.43 of this report, although it is unclear how likely this would be to occur in this instance or that there is an established causal connection between the implementation of CPZ's generally and the paving over of front gardens. It is noteworthy that many properties in Hoadly Road have already paved over the majority of their front gardens. It is noted that no specific data has been provided in any representation about this particular issue which would substantiate the claim. Moreover, what we can say is that there is no evidence to show a disproportionate rise in vehicle crossover applications (as the necessary access to a new driveway) as a result of CPZ's being introduced in the borough. For example, within the Streatham Hill East CPZ area, which was introduced in November 2020, 2 vehicle crossover applications have been received in the 11 months since the CPZ commenced.

The issue regarding teachers parking and the concern about parking associated with Streatham and Clapham High School and nearby streets has been addressed in paragraphs 2.15 and 2.17 of this report, as have requests for resident only bays in Hoadly Road (paragraph 2.17).

It should be noted that teachers permits carry a charge which is more expensive than any resident permit. It is hoped that the charging mechanism, which is subject to regular review, results in a change of approach or modal shift from motorists. However if it becomes evident that residents are negatively impacted in terms of the number of parking spaces available to them and if it is established that teacher parking unreasonably impacts residents being able to access the kerbside, then, as explained in the report, Officers would investigate those issues further through the ad-hoc parking changes programme.

Paragraph 1.2 of the 23 April 2021 Officer Delegated Decision report entitled "Proposed Controlled Parking Zones in St Leonard's and Streatham Vale (Stage 1 Consultation results)" outlines how CPZs help achieve the commitment of being carbon neutral by 2030.

- Improving the quality of life for residents by their being reliably able to park close to their home.
- Discouraging car-borne commuting, thereby encouraging the use of more sustainable modes of transport and improving air quality.
- Freeing-up kerbside space for use by delivery vehicles, electric vehicle charging points, cycle hangars, short-stay parking by visitors and customers.

- Making the borough's streets safer, less congested and protecting access for the vehicles who need to use them.
- Prioritising the needs of pedestrians, cyclists and bus users.
- Encouraging owners to switch to low-emission vehicles when changing vehicles.
- Improving the visual amenity of the borough's streets, particularly in town centres and residential areas

Accordingly, it is considered that the proposed CPZ would not encourage huge amounts of travel by non-sustainable fossil fuel cars across London to a place of work, over and above what currently occurs. Instead, it should reduce such journeys across the board, noting that in providing teachers permits the Council has acknowledged that this particular group of people should have some provision in parking near their place of work.