

Croydon Council

For general release

REPORT TO:	TRAFFIC MANAGEMENT ADVISORY COMMITTEE 12 July 2018
SUBJECT:	EXETER ROAD AREA – OBJECTIONS TO THE PROPOSED EXTENSION OF THE CROYDON CPZ (EAST OUTER PERMIT AREA)
LEAD OFFICER:	Shifa Mustafa, Executive Director of Place
CABINET MEMBER:	Councillor Stuart King, Acting Cabinet Member for Environment, Transport & Regeneration (Job Share)
WARDS:	Addiscombe West
CORPORATE PRIORITY/POLICY CONTEXT: This report is in line with objectives to improve the safety and reduce obstructive parking on the Borough's roads as detailed in: <ul style="list-style-type: none">• Croydon Local Plan Feb 2018• The Local Implementation Plan; 3.6 Croydon Transport policies• Croydon's Community Strategy; Priority Areas 1, 3, 4 and 6• The Croydon Plan 2nd Deposit; T4, T7, T35, T36, T42 and T43.• Croydon Corporate Plan 2015 – 18• www.croydonobservatory.org/strategies/	
FINANCIAL IMPACT: These proposals can be contained within available budget.	
FORWARD PLAN KEY DECISION REFERENCE NO.: Not a Key Decision	
1. RECOMMENDATIONS That the Traffic Management Advisory Committee recommend to the Acting Cabinet Member for Environment, Transport and Regeneration (job share) that the Acting Cabinet Member: 1.1 Consider the objections to extending the existing Croydon Controlled Parking Zone (East Outer Permit Area) to Morland Avenue, Vincent Road, Leicester Road, Stretton Road, Edward Road, Rymer Road, and Exeter Road with a combination of Shared-Use Permit/Pay & Display (8 hours maximum stay) and single yellow lines operating 9am to 5pm, Monday to Saturday.	

- 1.2 Agree for the reasons detailed in this report to extend the Croydon Controlled Parking Zone into the above roads as shown on drawings no. PD 348 a-f.
- 1.3 Inform the objectors and supporters of the above decision.

2. EXECUTIVE SUMMARY

- 2.1 The purpose of this report is to consider objections received from the public following the formal consultation process on a proposal to extend the existing Croydon Controlled Parking Zone (East Outer Permit Area) to Morland Avenue, Vincent Road, Leicester Road, Stretton Road, Edward Road, Rymer Road, and Exeter Road, with a combination of Shared-Use Permit/Pay & Display machines (8 hours maximum stay) and single yellow lines operating from 9am to 5pm, Monday to Saturday.
- 2.2 The outcome of the formal consultation was reported to the Executive Director of Place as required by the delegation from the Leader dated 6 June 2016 in relation to Traffic Management Orders. On 4 July 2018 the Executive Director of Place referred the matter to this committee on the basis that she considered it appropriate to do so.

3. BACKGROUND

- 3.1 Following a petition from Exeter Road in 2016 residents were consulted on a possible extension of the Croydon (East Outer Permit Area) Controlled Parking Zone into Morland Avenue, Vincent Road, Leicester Road, Stretton Road, Edward Road, Rymer Road, Exeter Road, Fullerton Road, Dartnell Road, Brampton Road, Dominion Road, Laurier Road, Bredon Road, Kemerton Road, Jesmond Road, Amberley Grove, Bredon Gardens, Gordon Crescent, and part of Morland Road.
- 3.2 On 13 December 2017 the Committee agreed a report (minute A5/16 refers) to extend the zone into Morland Avenue, Vincent Road, Leicester Road, Stretton Road, Edward Road, Rymer Road, and Exeter Road following a positive response from a majority of respondents in these streets.
- 3.3 Following detailed design occupiers in this area were formally consulted (public notice stage) on a proposal with 9am to 5pm, Monday to Saturday parking controls. Residents/businesses within this area were written to on 17 May 2018 with a copy of the relevant drawings and the public notice, and invited to submit objections to/comments on the scheme before Wednesday 13 June 2018.

4. OBJECTIONS AND RESPONSES

- 4.1 A total of 12 objections have been received to the proposal. In addition, 4 emails

of support have been received. A petition against the scheme has also been submitted for consideration.

Objection 1

4.2 The first objection (from a resident of Edward Road) was raised on the grounds that:

- The (formal) consultation letter did not confirm if votes were counted on a road by road basis or for the entire area
- The proposal would prevent visitors from parking within the zone, or close by
- Visitor permits are limited in number
- Visitor permits are expensive
- CPZ extensions transfer parking problems onto adjacent unrestricted streets

Objection 2

4.3 The second objection (from a resident of Rymer Road) was raised on the grounds that:

- When CPZs were introduced into neighbouring roads, they made minimal difference and are just as busy as the uncontrolled roads
- The scheme is a way for the Council to make money
- There is no parking problem in the area, they can always find a parking space and don't want to pay to solve a problem which doesn't exist.

Objection 3

4.4 The third objection (from a resident of Rymer Road) was raised on the grounds that:

- The majority of people who responded to the initial informal consultation voted against the scheme. The (formal consultation) letter was misleading as it implied that residents agreed with the scheme
- There is no parking problem on Rymer Road
- The scheme is just an excuse for the Council to charge more tax
- The cost of the permits and the administration fees are too high
- All the residents which the objector has spoken to are against the scheme

Objection 4

4.5 The fourth objector (a resident of Edward Road) merely stated that they were opposed to the scheme. No reasons for the objection were stated.

Objection 5

4.6 The fifth objection (from a resident of Rymer Road) has been raised on the grounds that:

- The parking problems are caused more by commuters than by residents

- The timing of the zone will contribute to inconsiderate parking near local schools
- None of the residents which the objector has spoken to want the restrictions
- The scheme should only operate for 1 hour Monday – Friday only
- They are concerned that schools may not have been consulted
- They are concerned that school travel plans may need to be reviewed and changed when the scheme is implemented
- They are concerned that the scheme will result in more parents parking inconsiderately at drop off and pick up time
- The CPZ extension would push the problem into surrounding area
- They believe that a transport statement and an impact statement should have been prepared and distributed to residents
- They believe that the proposed restrictions are excessive
- They believe that the impact of the scheme would be more negative than positive

Objection 6

4.7 The sixth objection has been raised on the grounds that:

- Although parking on Rymer Road is difficult they can usually find a space
- They believe that if the scheme was implemented residents would be just as likely not to find a parking space as commuters could pay to park for 8 hours
- The scheme should be residents parking only with no Pay and Display option
- The scheme would need policing

Objection 7

4.8 The seventh objection (from a resident of Edward Road) has been raised on the grounds that:

- Three of the roads in the proposed extension area voted against the scheme in the informal consultation
- Non-residents and commuters will still be able to park in this area
- Parking problems occur during evenings and overnight, therefore scheme will not help
- There is no guarantee of a parking space
- Residents will be financially worse off if the scheme goes ahead
- The scheme will result in less parking spaces
- They are unhappy with the administration charge applied to new permits
- They believe that it is a money making scheme for the Council

Objection 8

4.9 The eighth objection has been raised on the grounds that:

- There will be less space available if the scheme is implemented
- Edward Road, Exeter Road, and Rymer Road should be made one-way

Objection 9

4.10 The ninth objection has been raised on the grounds that:

- There is no parking problem in Rymer Road during the proposed hours of operation
- The scheme is only being introduced to place a financial burden on residents
- Rymer Road voted against the proposals during the informal consultation
- The scheme, if introduced, should be residents only
- Residents' permits should be provided free of charge
- Marked bays will reduce the number of cars which can park in the street
- There are less spaces available for residents since the opening of Fitzroy Academy

Objection 10

4.11 The tenth objection has been raised on the grounds that:

- The objector believes that it will not solve the parking problem in the area
- They believe that it is a money making scheme
- Parking problems are mainly in the evening, not during the day
- The bay layout will allow less cars to park
- Scheme will be of no benefit to residents

Objection 11

4.12 The eleventh objection was raised on the grounds that:

- They did not receive the initial consultation documents
- They are concerned about the cost that residents will face to park on their street
- They are concerned that their road is not one-way

Objection 12

4.13 The twelfth objection (from a resident of Exeter Road) was raised on the grounds that:

- They believe that the scheme is heavy handed and inappropriate
- They have observed that at no point during the restricted hours is there a lack of parking on Exeter Road

- It is difficult to find parking spaces in the evening and the scheme will not alleviate this problem
- They believe that most problems are caused by parents dropping off and picking up children at the local primary school rather than commuters
- Saturday restrictions are unnecessary, controls should only be in operation Monday to Friday
- Redundant dropped kerbs should have parking bays painted across them
- The permits cost too much compared to other local authorities and should be reduced
- Current restrictions are not adequately enforced and they doubt how thoroughly a new CPZ would be enforced
- Introducing this scheme would transfer parking problems onto neighbouring streets

4.14 **Objection 13**

The thirteenth objection (from a resident of Nottingham Road) was raised on the grounds that:

- There will be less parking available for residents
- People will have to pay to park in the area
- There will be no guarantee that residents will find a parking space

4.15 **Objection 14**

The fourteenth objection (from a resident of Rymer Road) was raised on the grounds that:

- It is difficult to find a parking space at night
- Aside from during the daily school runs, parking during the day is not an issue
- A minimal number of commuters park on Rymer Road due to the distance from East Croydon station
- The CPZ will cost them money
- They believe that each dwelling should be issued with one free residents permit and charges only applied to second and third permits

4.16 **Objection 15**

The fifteenth objection (from a resident of Edward Road) was raised on the grounds that:

- The original questionnaire should have asked the question 'Should controls NOT be introduced' rather than 'Are you in favour of extending the Croydon CPZ in your road'
- There was an error in the formal consultation letter which described the informal consultation as having taken place 'earlier this year', when the

informal consultation actually took place in late 2017

- The consultation process is flawed as no independent verification of the votes cast has taken place

4.17 **Petition**

A petition against the proposed scheme, submitted by a resident of containing 70 electronic signatures has been received.

The introduction to the petition reads:

‘Greetings,

Stop the extension of the Parking Zone in Corydon’

Only general addresses were included so it was not possible to identify which signatories live within the consultation area (and surrounding roads). 44 signatories identified as living in Croydon, 7 in the UK, 7 in London, 2 in Tottenham, and 1 each in Epsom, Kensington, South Croydon, Petworth, Barking, Leyton, Hampton, Mitcham, Hornsey, and Romford.

Responses

- 4.18 Clear details of the results of the informal consultation are contained in the corresponding TMAC (Traffic Management Advisory Committee) report. Residents were given details of how to access this report with the informal consultation documents.
- 4.19 The majority of respondents within the revised extension area who voted in favour of the proposals seem to agree that the scheme will help them. Rymer Road (along with Stretton Road and Vincent Road) voted against the scheme. However, TMAC (Traffic Management Advisory Committee) decided that the scheme would have to proceed in a continuous area rather than scatter roads which may cause confusion for motorists as well as particularly severe parking problems in controlled pockets surrounded by controlled streets.
- 4.20 Introducing a CPZ will always transfer some parking problems to other streets. The only way to completely avoid this issue would be to have no parking controls, which in a large town centre like Croydon, with numerous transport links would be inappropriate. CPZs in neighbouring roads (such as Davidson Road) do appear to have improved the parking situation during the hours of operation. Evidence shows that a majority of commuters choose not to pay and display.
- 4.21 Visitor permits are cheaper to purchase than corresponding P&D vouchers, purchase in half day slots. When residents have used up all visitor permits, they may then choose to pay and display. Schemes such as this should be self-financing, it is not possible to provide permits free of charge.
- 4.22 Residents were offered a choice of possible operational times. A majority of respondents choose 9am -5pm Mon – Sat. While designing the scheme, officers attempted to maximise the number of parking bays, while also ensuring that bays are located away from driveways and junctions.

- 4.23 Officers do not expect the proposals to have a significant effect on local schools. Schools which fell within the informal consultation area were consulted (along with all residences and businesses within that area). The Council's Road Safety Engineer is satisfied that the adjacent school's School Travel Plans do not need to be altered to accommodate this scheme.
- 4.24 No Transport Statement, nor Impact Statement has been prepared. This is standard procedure for introducing controlled parking schemes.

Support for the proposals

- 4.25 During the consultation 4 emails were received expressing support for the scheme.
- 4.26 The first message of support (from a resident of Rymer Road) stated that
- The resident regularly struggles to park on Rymer Road
 - They are happy to pay the cost of a parking permit
 - They believe that the proposed scheme will improve their situation
- 4.27 The second message of support (from a resident of Exeter Road) stated that
- It is currently difficult for residents (even those with only one car) to park on Exeter Road due to commuters, parents dropping children at the local school, vans and coaches parking on the street
 - Existing double yellow lines and school stopping restrictions in the area are not enforced. If the scheme proceed more effective enforcement is needed.
 - They are happy to pay for a resident's permit and the corresponding administration charge
 - It is vital that the scheme is fully enforced to avoid complaints from permit holders
 - They look forward to the implementation of the scheme without delay
 - They believe that the scheme will be of benefit to all concerned
- 4.28 The third message of support (from a resident of Stretton Road) stated that
- They are extremely happy that the CPZ is going to be introduced in these streets
 - It is currently difficult to park on Stretton Road
 - Their driveway is regularly blocked by other motorists
- 4.29 The fourth message of support (from a resident of Edward Road) stated that
- They want the scheme to be implemented without any delays
 - They currently face may parking problems on their street

5 CONSULTATION

- 5.1 The purpose of this report is to consider comments and objections from the public following the giving of public notice of the proposals. Once the notices were published, the public had up to 21 days to respond.
- 5.2 The legal process requires that formal consultation takes place in the form of Public Notices published in the London Gazette and a local paper (Croydon Guardian). Although it is not a legal requirement, this Council also fixes notices to lamp columns in the vicinity of the proposed schemes to inform as many people as possible of the proposals.
- 5.3 Organisations such as the Fire Brigade, the Cycling Council for Great Britain, The Pedestrian Association, Age UK and bus operators are consulted separately at the same time as the public notice. Other organisations are also consulted, depending on the relevance of the proposal. No comments were received from any of these organisations.

6. FINANCIAL CONSIDERATIONS

The required capital expenditure will be funded via an allocation within the TfL LIP grant funding allocated to Croydon for 2018/19. Total funding of £90k is included for controlled parking schemes and ELVC in 2018/19. Attached to the papers of this meeting is a summary of the overall financial impact of this and other applications for approval at this meeting. If all applications were approved there would be £18k funding available in 2018/19.

7.1 Revenue and Capital consequences of report recommendations

	Current Financial Year 2018/19 £'000	M.T.F.S – 3 year Forecast		
		2019/20	2020/21	2021/22
		£'000	£'000	£'000
<u>Revenue Budget available</u>				
Expenditure	0	0	0	0
Income	0	0	0	0
<u>Effect of Decision from Report</u>				
Expenditure	0	0	0	0
Income	0	0	0	0
Remaining Budget	<u>30</u>	<u>0</u>	<u>0</u>	<u>0</u>

Capital Budget available

Expenditure	90	0	0	0
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Effect of Decision from report

Expenditure	40	0	0	0
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Remaining Budget	<u>50</u>	<u>0</u>	<u>0</u>	<u>0</u>
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7.2 The effect of the decision

7.2.1 The cost of extending controlled parking into the Exeter Road area has been estimated at £40,000. This includes the provision of Pay & Display machines, signs and lines.

7.2.2 These costs can be contained within the available TfL LIP budget for 2018/19.

7.2.3 The ongoing costs of maintaining the controlled parking will be managed within existing revenue budgets.

8.3 Risks

8.3.1 The current method of introducing parking controls is very efficient with the design and legal work being carried out within the department. The marking of the bays and the supply and installation of signs and posts is carried out using the new Highways Contract and the rates are lower than if the schemes were introduced under separate contractual arrangements

9.4 Options

9.4.1 An alternative option is to introduce a residents' only parking scheme. Virtually all permit schemes in the Borough are shared-use with Pay & Display users and this offers the greatest flexibility for drivers who may be visitors to residents and businesses in the area or the minority of commuters who are willing to pay for all day parking.

10.5 Savings/ future efficiencies

10.5.1 If controlled parking is introduced future income will be generated from Pay & Display takings and permit sales, together with enforcement of these controls through vehicle removals and Penalty Charge Notices. CPZ schemes have proven to be self-financing usually within 4 years of introduction.

10.5.2 Approved by: Felicia Wright, Head of Finance – Place

11 COMMENTS OF COUNCIL SOLICITOR AND MONITORING OFFICER

11.1 Sections 6, 45, 46, 47, 49, 124 and Part IV of Schedule 9 of the Road Traffic Regulation Act 1984 (RTRA) provides the Council with the power to implement the changes proposed in this report. This legislation gives a local authority the power to make Traffic Management Orders (TMO) to control parking by designating on-street parking places, charging for their use and imposing waiting

and loading restrictions on vehicles of all or certain classes at all times or otherwise.

- 11.2 In making such Orders, the Council must follow the procedures set out at Schedule 9, Part III of the Road Traffic Regulation Act 1984 and detailed in the Local Authorities Traffic Orders (Procedure)(England and Wales) Regulations 1996 (the 1996 Regulations). The said Regulations, prescribe inter alia, specific publication, consultation and notification requirements that must be strictly observed. It is incumbent on the Council to take account of any representations made during the consultation stage and any material objections received to the making of the Order, must be reported back to the decision maker before the Order is made.
- 11.3 By virtue of section 122 of the RTRA, the Council must exercise its powers under that Act so as 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. These powers must be exercised so far as practicable having regard to the following matters:-
- the desirability of securing and maintaining reasonable access to premises.
 - the effect on the amenities of any locality affected including the regulation and restriction of heavy commercial traffic so as to preserve or improve amenity.
 - the national air quality strategy.
 - the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles.
 - any other matters appearing to the Council to be relevant.
- 11.4 Recent High Court judgment confirms that the Council must have proper regard to the matters set out at s 122(1) and (2) and specifically document its analysis of all relevant section 122 considerations when reaching any decision.
- 11.5 Approved by Sandra Herbert, Head of Litigation and Corporate Law, for and on behalf of Jacqueline Harris-Baker, Director of Law and Monitoring Officer.

12. HUMAN RESOURCES IMPACT

- 12.1 Extending the East Outer Permit Area into the Exeter Road Area will require Increased enforcement duties by Civil Enforcement Officers. It is anticipated that
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This additional enforcement can be undertaken using existing resources.
- 12.2 Approved by: Sue Moorman, Director of Human Resources.

13. EQUALITIES IMPACT

13.1 An initial Equalities Impact Assessment (EqIA) has been carried out and it is considered that a Full EqIA is not required.

14. ENVIRONMENTAL IMPACT

14.1 Evidence from nearby roads where controls have recently been introduced has shown that reducing the density of parking, especially during the daytime, has resulted in far easier street cleaning and therefore a general improvement in the environment.

15. CRIME AND DISORDER REDUCTION IMPACT

15.1 Waiting restrictions at junctions are normally placed at a minimum of 10 metres from the junction, which is the distance up to which the Police can place Fixed Penalty Charge Notices to offending vehicles regardless of any restrictions on the ground.

16. REASONS FOR RECOMMENDATIONS

16.1 The recommendation is to extend the existing Controlled Parking Zone into Morland Avenue, Leicester Road, Vincent Road, Stretton Road, Edward Road, Rymer Road, and Exeter Road since a majority of respondents in this area voted in favour of parking controls and a parking scheme should ensure adequate parking facilities for residents, visitors and for local businesses.

16.2 Also the introduction of marked bays away from driveways, junctions and other locations where parking causes problems, with yellow line waiting restrictions in between, will ensure the expeditious, convenient and safe movement of all road users.

17. OPTIONS CONSIDERED AND REJECTED

17.1 An alternative option is not to introduce the parking controls. This could have a detrimental effect on residents in that they would continue to suffer with parking issues in relation to obstruction, road safety and traffic flow problems.

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BACKGROUND PAPERS – LOCAL GOVERNMENT ACT 1972