

## Appendix 1. Officer response to objections

Issue	Response
General	<p>The parking scheme was formally consulted between 5 September 2024 to 3 October 2024. During the consultations, all addresses within the proposed area were written to and a letter sent out detailing the rationale for consulting the area upon the parking scheme. The parking scheme was informally consulted on between 11 December 2023 and 28 January 2024. During the consultations, all addresses within the proposed area were written to and a booklet sent out detailing the rationale for consulting the area upon the parking scheme.</p> <p>This and the previous consultation were not run as a referendum but as a way of gathering information on local parking needs to better design a scheme and to gather information on the general comments towards permit parking in the area.</p> <p>Below is a link to the decision and appendices taken in March 2024 following the informal consultation:</p> <p><a href="https://moderngov.southwark.gov.uk/ieDecisionDetails.aspx?ID=8052">https://moderngov.southwark.gov.uk/ieDecisionDetails.aspx?ID=8052</a></p> <p>All of the responses to this informal consultation and the previous consultation gather information on local parking needs and respondents' views on permit parking in the area and have been carefully evaluated, together with a range of other factors and considerations. The holding of two consultations and the consideration of all of the relevant factors prior to reaching a decision, recognises that the Council has engaged with the community and is then in a position to take a decision upon whether or not to introduce any CPZ, whether as proposed, with variations, or at all.</p> <p>Should the scheme be implemented, the permit zone will see the removal of non-local vehicles parking in the area, which will mean that the roads are quieter with less traffic and less pollution. Streets in the vicinity that currently do not experience parking pressure will be considered for inclusion to avoid these being used for parking as displacement from new parking restrictions.</p> <p>Under The Road Traffic Regulation Act 1984 a local authority may by order designate parking places on highways and the authority may make charges for vehicles left in a parking place so designated.</p>

	<p>The matters to which that authority shall have regard include-</p> <ul style="list-style-type: none"> <li>a. The need for maintaining the free movement of traffic;</li> <li>b. The need for maintaining reasonable access to premises</li> </ul> <p>(<a href="https://www.legislation.gov.uk/ukpga/1984/27/section/45#:~:text=45%20Designation%20of%20paying%20parking%20places%20on%20highways.">https://www.legislation.gov.uk/ukpga/1984/27/section/45#:~:text=45%20Designation%20of%20paying%20parking%20places%20on%20highways.</a>)</p>
No change needed	<p>The Streets for People strategy explains the Council’s commitment to improving residents’ quality of life and taking action on climate change, by changing how we all travel and use streets in our borough. This involves initiatives to encourage more sustainable modes of transport.</p> <p>The 2021 census data showed that the majority of residents in Southwark do not own a car. The Council is recognising that and seeking to redistribute how we use public highways. The aim is that residents may reconsider their car usage, in line with the Streets for People strategy.</p>
No parking problems in the road	<p>The council has carried out parking pressure surveys in the area, the data indicates moderate to high levels of pressure in the majority of the roads. A permit scheme will help reduce non-local traffic and therefore increase the available parking for residents, businesses and their visitors and customers.</p>
Teachers/Commuters need somewhere to park	<p>The council and the scheme seek to discourage commuting. Where possible commuters should seek more sustainable modes of transport such as cycling and walking, or public transport. Where this is not possible, business permits are available which can be used in shared use bays. Also, much of the area remains uncontrolled so is not impacted by permit controls.</p>

	<p>The council offer 10 business permits per school to allow teachers to park in shared use bays within the permit zone. This number of permits per school is over the usual business permit allowance of 6 business permits per location.</p> <p>More details and applications can be found on our website here: . <a href="https://www.southwark.gov.uk/parking-streets-and-transport/parking/parking-permits/business-parking-permits">https://www.southwark.gov.uk/parking-streets-and-transport/parking/parking-permits/business-parking-permits</a></p>
Carers/Social worker parking	<p>The council offers permits that cater for carers and social workers. More information can be found on our website here: <a href="https://www.southwark.gov.uk/parking/parking-permits/on-street-permits">https://www.southwark.gov.uk/parking/parking-permits/on-street-permits</a></p>
Cost	<p>The Council, as part of its budget setting process, sets the cost of permits and permit costs are benchmarked against other London local authorities to ensure that they offer value for money. Whilst it is a financially difficult time for many people currently, the long-term benefits of safer and quieter streets and healthier and more sustainable travel options, is a long-term goal for the council. Also, owning and running a car in London is expensive and most households in the borough do not own a car.</p> <p>Permit and PCN income is heavily regulated and permit charges are not to be used to generate income for the council, as such any excess income is ring fenced. As per the TMA 2004. More details can be found here: <a href="https://www.legislation.gov.uk/ukpga/2004/18/schedule/9">https://www.legislation.gov.uk/ukpga/2004/18/schedule/9</a>. Any surplus income will be used within the legal ring-fence for parking income under section 55 of the Road Traffic Regulation Act 1984.</p>
Displacement	<p>There will always be a level of displacement when introducing a new parking scheme; however, the limit of this will be unknown until after the scheme goes live. The Council tries to design schemes in a way that we can try to mitigate such displacement, but it is difficult to prevent. It is often seen that people will choose not to drive and use other means of transport therefore minimising this as an issue. The scheme is not being installed on private estates.</p> <p>The scheme will be reviewed within 12-18 months of being implemented, should it go ahead. Therefore, any issues which remain once the scheme has been bedded in we will seek to address these with residents and businesses.</p>

Not needed on our road/area/not near station	<p>This area is in London and does not currently have parking restrictions. This leaves the area vulnerable to parking stress caused by commuters and other visitors. The areas surrounding the proposed permit schemes are mostly controlled. As more and more councils in London protect their parking with the addition of permit schemes, uncontrolled areas become more desirable for commuters and long-term parking. A permit scheme would address this issue and return parking spaces for the residents and business that live and work in a permit zone as well as having somewhere for customers and visitors to park. The Road Traffic Regulation Act 1984 s122 states that one of the main reasons for introducing parking restrictions is to maintain ‘the provision of suitable and adequate parking facilities on and off the highway’.</p> <p><a href="https://www.legislation.gov.uk/ukpga/1984/27/section/122">https://www.legislation.gov.uk/ukpga/1984/27/section/122</a></p> <p>Parking restrictions are also needed to ensure that planning conditions on new developments can be enforced and there will not be an increase of vehicles from occupants of those developments or their visitors and tradespeople.</p>
Family/visitor parking	<p>The majority of the streets in the area remain free to park. Parking is also free outside of the controlled hours. However, parking permits are available to residents for their visitors and tradespeople to use whether the resident has a vehicle or not. There are also Pay by Phone bays in the area for use. A link to visitor vouchers can be found here: <a href="https://www.southwark.gov.uk/parking/parking-permits/on-street-permits/visitor-s-parking-permits">https://www.southwark.gov.uk/parking/parking-permits/on-street-permits/visitor-s-parking-permits</a></p>
Business Permit costs	<p>Permit prices are set by the council annually. Prices are benchmarked against other London local authorities to seek to ensure that the rates are in line with other charges.</p>
Parents need somewhere to park	<p>The council is seeking to reduce commuting and to promote more sustainable modes of transport. The permit scheme discourages car use, however for parents that have no other option than to drive, will be able to do so on the roads which are excluded from the permit zone proposals, so remain free to park. There will also be shared use parking facilities provided in the area where you can pay to park.</p> <p>Furthermore, based on comments that parents will circle the area to find parking causing more pollution, we have considered this as part of the consultation and design of the scheme. The scheme is to encourage drivers to use more sustainable modes of transport and therefore we do expect behaviour change from all drivers when the scheme is implemented. This will take time to embed in the area but the long term goal is for parents to use their vehicles less to assist in safety near the school but also to assist in reducing vehicle pollution near</p>

	<p>the school. There is also a coach service which the school have in place which parents could use instead of a vehicle to transport children to school.</p> <p>There was a further comment that the CPZ is unfair on working parents and discriminatory to women. Having considered this comment, we disagree that it is discriminatory to women, as this affects all parents and carers and is not affecting one specific protected cohort. School transport affects all carers and parents including grandparents and paid / nonpaid carers.</p> <p>It should be noted, that whilst we have taken account of the comments from parents and carers, they are not the main consideration of the scheme, as the scheme is being proposed for local residents and businesses and not for parents and carers commuting to the school.</p>
Proposed design	<p>The parking scheme has been designed to maximise available kerb space for parking, this includes permit bays in residential areas, pay by phone and shared use bays in commercial areas. Double yellow lines have been introduced on junctions to improve sight lines and road safety at junctions and on roads as safe passing places for traffic. The highway code advises that vehicles should not park within 10 metres from a junction which we try to keep to, to maximise visibility at junctions. Where needed, we will be guided by independent Road Safety Assessments (RSAs) to help design schemes prioritising safety and access, as well as the Southwark Streetscape Design Manual <a href="https://www.southwark.gov.uk/assets/attach/4655/DS-002-Yellow-line-and-blip-waiting-restriction-markings.pdf">https://www.southwark.gov.uk/assets/attach/4655/DS-002-Yellow-line-and-blip-waiting-restriction-markings.pdf</a></p> <p>Some comments were received that the council are 'sneaking in' double yellow lines. This is not the case, throughout the informal and statutory consultation we have proposed junction protection for yellow lines due to safety. Junction protection is essential for sight lines and if not in place causes risk to pedestrians and cyclists when crossing junctions and also improves access for vehicles especially HGVs for example for refuse collection and emergency vehicles.</p> <p>There was a comment that the proposed parking restrictions will impact users of the tennis club and may reduce ability to attend which will have a negative effect on health. This is not the intention of the scheme. The scheme is to encourage more sustainable modes of transport for local short journeys and reduce commuter parking in the area. It is hoped when the scheme is bedded drivers will change their behaviour and not drive for short journeys.</p>

Customer parking	A permit scheme will encourage visitors to key areas of interest by removing all day parking and encouraging the turnover of parking spaces for customers. Pay by Phone shared use bays will usually be installed as a provision near shops and businesses. Customers can park during controlled hours and pay by the minute. Where possible, loading bays will be provided for businesses as well as their customers. There will be a net loss of parking spaces outside the shops on Dulwich Village, however parking spaces have been redesigned following a recommendation by a Road Safety Audit to improve safety at this location.
Public transport options not good	CPZs are proven to reduce the amount of cars parking in that area, less cars on the roads reduces bus delays and increases efficiency as well as improving cycle safety. This should encourage more people to use these more sustainable modes of transport. The council does not run bus services; these are operated by TfL.
Disabled Parking	<p>The introduction of a permit scheme will increase the available parking at key destinations. Permit parking encourages the turnover of parking spaces and discourages all day parking. Blue Badge holders have many parking privileges in Southwark, these include parking for free in marked disabled bays, shared use bays and on yellow lines (without kerb blips) for up to 3 hours when displaying a valid blue badge and clock. More information can be found here: <a href="https://www.southwark.gov.uk/parking/disabled-parking/parking-with-a-blue-badge">https://www.southwark.gov.uk/parking/disabled-parking/parking-with-a-blue-badge</a></p> <p>Discounts are available for blue badge holders who wish to purchase a resident permit, this is currently £30 per annum as opposed to the regular price of £225 per annum. Prices can be viewed here: <a href="https://www.southwark.gov.uk/parking/parking-permits/on-street-permits/resident-parking-permits">https://www.southwark.gov.uk/parking/parking-permits/on-street-permits/resident-parking-permits</a></p>
Encouraging gardens to be converted to driveways	<p>Some comments were received that the scheme encourages people to convert their front gardens for a driveway which reducing green space and creates more parking on street. This is not what the scheme is for and is not encouraged.</p> <p>The scheme is to reduce congestion and assist parking for residents and businesses. Furthermore, it is to prevent schools traffic congestion and parking to make the area safer and cleaner for the children. At no point have we encouraged conversion of gardens; in fact the council want to encourage more greenery as per our Streets for People Strategy.</p>
Double yellow lines	Double yellow lines have been proposed on junctions in-line with the highway code and seek to improve road safety by improving sight lines at junctions for all road users, pedestrians and cyclists.

Support	No comment
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