

## Appendix 1. Officer response to objections

Issue	Response
General	<p>The statutory consultation for the parking scheme ran between 5 September to 3 October 2024. During the informal and statutory consultations, all addresses within the proposed area were sent a letter detailing the rationale for the proposed parking scheme. Following the informal consultation which ran between December 2023 and January 2024, it was decided to amend the proposals by abandoning the proposed permit area in accordance with the feedback from the majority of residents, but instead to include some of the roads where residents had been in support of the permit controls into the existing CPZ 'B'. This was due to the roads being in proximity to the existing controls and the fact that they were geographically apportioned to be included into the existing zone B. The hours of operation for the existing zone 'B' are Monday to Saturday, 8.30am to 6.30pm. Furthermore, as roads such as Carden Road were not to be included in the zone, there was no requirement for 7 day a week parking which some residents on this road has requested. The council has been fully transparent with its analysis of the previous consultation and decision making, reports and data can be found published on the council's website:</p> <p><a href="https://modern.gov.southwark.gov.uk/ieDecisionDetails.aspx?Id=8051#:~:text=1.,in%20response%20to%20resident%20feedback">https://modern.gov.southwark.gov.uk/ieDecisionDetails.aspx?Id=8051#:~:text=1.,in%20response%20to%20resident%20feedback</a>.</p> <p>All of the responses to this statutory consultation and the previous informal consultation gather information on local parking needs and respondents' views on permit parking in the area. These have been carefully evaluated, together with a range of other factors and considerations. Views of residents and businesses on private or adopted roads have been considered as well as visitors to the area. 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. The consultation was never run as a referendum, however, all responses have been considered when making the decision to progress to a statutory consultation.</p> <p>Roads were excluded in the zone due to the lack of majority support from residents for permit controls, this included Carden Road, where in the informal consultation over 70% of respondents objected to the proposals. However, the scheme will be reviewed in the future, approximately 12 to 18 months after the scheme (subject to approval), which will give the opportunity for roads which are abandoned from the current controls to be included subject to public support.</p>

	<p>Should the amended proposed scheme be implemented, the extended permit zone “B” should see the removal of non-local vehicles parking in the area at the stated times, 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 have been 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>
<p>Objected but stated 'no change needed'</p>	<p>Objection received, but no other comment than 'no change needed'. There was significant overlap in many of the comments received which objected to the updated scheme on the basis that it was not necessary. Most of the reasons given in support of such objections are addressed in the sections below.</p> <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> <p>It is also clear that there are mixed feelings within the community regarding the scheme, with some residents very much in favour of the introduction of a CPZ. The Council has to balance the views of all residents together with the survey data gathered, the commitments under the Streets for People strategy, and taking into account future parking</p>

	<p>pressure from new developments. The Council then has to consider the most appropriate way to apply the statutory powers available to address where there are parking issues.</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>
Not eligible for permits	<p>Some properties have a planning condition which prevents the sale of permits to residents residing at certain addresses so we are not able to issue them with a permit. Such requirements are generally specified in legal agreements which are registered as local land charges which are usually considered as part of normal conveyancing searches. This is something that should have been explained to the occupiers when they took up residency.</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. More details about setting the levels of charges can be found in the Traffic Management Act 2004 (<a href="https://www.legislation.gov.uk/ukpga/2004/18/schedule/9">https://www.legislation.gov.uk/ukpga/2004/18/schedule/9</a>).</p> <p>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. 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. However, the extended zone “B” will be reviewed within 12-18 months of go live where we may make changes as required. 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>
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’ <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 parking	<p>Parking is 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>
Not enough parking space	<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>

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>
Comments received in support	No response
Design Change	Comments to be considered as part of review of the proposed design.
Scheme is not big enough	The boundary of the zone has been designed to reflect the responses of the majority of people who would like permit controls. Roads which fall in the natural boundary have been included to prevent displacement. Should the scheme be implemented, it will be reviewed in the future, and if requested, additional roads could be added to expand the zone.
Properties from outside the boundary of the zone are not eligible for permits	Only those that reside in the permit area will be eligible for permits. Special consideration may be given to properties where there is no alternative, but on a case by case basis.

<p>The scheme goes against older or vulnerable people who use their cars for safety</p>	<p>A permit parking area should see more available parking spaces on residential roads and outside shops and businesses as a permit scheme will discourage people from outside the area parking in the permit area for prolonged lengths of time. This should mean people can park nearer to their homes and places of interest. People who use blue badges have special parking provisions, details of which are explained above.</p>
<p>The scheme will prevent parking for teachers</p>	<p>The permit scheme is designed to prevent commuter parking and to encourage more sustainable modes of transport. For teachers that can not use public transport, cycle or walk, the majority of roads in the area will remain uncontrolled and remain free to park. School are entitled to business permits.</p>
<p>The scheme will cause displacement on to estate roads</p>	<p>Due to the limited number of new roads being added to the permit scheme, it is considered that displacement will be minimal. Unfortunately estate roads are not considered public highway and therefore can not be included in the permit zone. However, it is possible for the land owner to introduce their own permit parking controls to prevent people from outside of the estate parking within the estate.</p>

