 Brent	<p style="text-align: center;">Cabinet 27 June 2016</p> <p style="text-align: center;">Report of the Strategic Director, Regeneration and Environment</p>
For Decision	Wards Affected: Whole Borough
On-Street Parking Service Offer and Charges in Controlled Parking Zones; decisions following consultation	

1.0 Summary

- 1.1 Cabinet agreed at its meeting on 14 March 2016 to undertake a major consultation exercise on a series of changes to the way in which the council manages, and charges for, on street parking in Controlled Parking Zones (CPZs). This report sets out the results of the consultation exercise and makes a coherent set of linked proposals for reform.

2.0 Recommendations

Cabinet is asked to formally express its thanks to all those who responded to the on-street parking consultation, and then agree:

Demand-Led Pay and Display Tariffs:

- 2.1 To freeze parking prices in Pay & Display bays borough-wide.

Daily Visitor Parking Charges:

- 2.2 To proceed to formal consultation on a Traffic Management Order, under the Road Traffic Regulation Act 1984, introducing new visitor parking charges in CPZ areas, with a £1.50 charge for up to 2 hours, a £3 charge for up to 4 hours, and a £4.50 charge for 'all-day' visitor parking of more than 4 hours.
- 2.3 To delegate authority to implement the price changes following formal consultation, including amendment of any relevant Traffic Management Orders, to the Strategic Director Regeneration & Environment, in consultation with the Lead Member for Environment.

Visitor Household Permit

- 2.4 To retain the Visitor Household permit.

- 2.5 To increase the charge made for the Visitor Household permit, from 1st October 2016, to a 2016/17 rate of £163 for a full year; £98 for 6 months and £66 for three months; and with future increases linked to the price of a third Resident Parking Permit for vehicles in the proposed 'Standard' emissions band.

Carer and Support Permit:

- 2.6 Dependent on agreement to recommendation 2.4 above, to withdraw the proposal to introduce a new Care and Support permit.

School Parking Permits:

- 2.7 In respect of parking for school staff:
- To allow schools within CPZs to purchase a maximum of 3 business permits, at the standard rate (£366 in 2016/17) and terms & conditions, with immediate effect;
 - To introduce a new scheme allowing qualifying schools to:
 - Purchase a maximum of 3 school staff parking permits at a rate discounted by 25% to reflect term-time use only, providing the school has a bronze level accredited travel plan;
 - Purchase additional school staff parking permits at the reduced term-time rate should they have either a silver (up to 6 school permits in total) or a gold (up to 9 school permits in total) level accredited travel plan.

Residents Parking Permits:

- 2.8 From 1st April 2017 to amend the resident parking permit scheme as follows:
- Simplifying emission-based bandings for resident household permits, as set out in paragraph 7.3, to provide a clearer signal and encouragement to switch to lower-emission vehicles
 - Introducing a minimum charge of £25 for a resident's parking permit for any vehicle (other than a powered two-wheel vehicle)
 - Reducing the permitted size of vehicles with resident permits to those weighing no more than 3.5 tonnes
- 2.9 To agree in principle to introduce a £25 supplement for diesel car permits, reflecting their additional contribution to air pollution, with effect from 1st October 2018 to give adequate notice and therefore time for owners to change to less polluting vehicles or transport modes.
- 2.10 To note that further research is required regarding the proposal to reduce resident permit entitlement from 3 permits to 2, as set out at paragraph 7.2.

Visitor Permit Entitlement:

- 2.11 Dependent on agreement to recommendation 2.4 above (to continue the offer of the Visitor Household permit), to cap the number of visitor permits any household can buy to a maximum of 300 permits p.a., commencing from 1st April 2017.

Trader Permits:

- 2.12 To develop and introduce a new one-day All Zones trader's permit, allowing a business vehicle to park in any CPZ within Brent for one day.

CPZ Concerns

Cabinet 27 June 2016

- 2.13 To note that a further report detailing and scoping a comprehensive review of the operation of CPZs will come to Cabinet in the autumn.

3.0 Background

- 3.1 The Council regulates and charges for on-street parking to manage demand from residents, businesses and visitors, assist the smooth flow of traffic, and reduce the number of vehicle trips, particularly at peak times. This supports the council's aims of encouraging the uptake of sustainable travel options, reducing air pollution, and reducing the number of people killed and injured on the borough's roads.
- 3.2 In November 2015, the council agreed its Parking Strategy (see Appendix A). This sets the context within which on-street parking policies and charges are made.
- 3.3 Demand for parking in Brent is very high, especially within Controlled Parking Zones (CPZs). Over time the Council has introduced a number of measures to control the demand for kerb space. On-street parking in the south-eastern part of the borough, and some areas of the south-west of the borough around Wembley, is managed through Controlled Parking Zones. These areas are more densely developed compared to the northern part of the borough, and have better public transport links. The south-eastern part is well served by Jubilee line and Overground stations in zones 2 and 3, whilst the south-western part is well served by stations on the Jubilee/Metropolitan [Wembley Park], Bakerloo [Wembley Central] and Piccadilly [Alperton and Sudbury Town] lines, and on the National Rail network [Wembley Stadium, Sudbury and Harrow Road].
- 3.4 There are now 40 Controlled Parking Zones in the borough, which have been gradually introduced over recent years. These contain 33,000 spaces serving 56,000 households. Each household can apply for up to three permits of their own, and can also access unlimited visitor parking. This entitlement is not sustainable. Cabinet received a report in November 2014 which drew particular attention to the issuing of large numbers of visitor permits in CPZ areas, increasing the difficulties faced by residents in parking their own cars (see summary in Appendices B-D). Since then clear evidence has emerged of visitor permits being resold illegally on the open market; several cases are under active investigation by parking and trading standards officers; consideration is now being given to prosecution through the courts.
- 3.5 In respect of car ownership the 2001 and 2011 Censuses provide information on the pattern of residents' car ownership in the borough, shown in the table below. Although the population of the borough grew, resident car ownership – at just over 86,000 vehicles - remained stable between 2001 and 2011. This was due to the increased proportion of car-free households, a trend common across London as a whole. Future trends in car ownership are hard to predict.

Table: Household car ownership in Brent

No. of cars/ vans per household	2001		2011	
	No. of h/h	%	No. of h/h	%
0 (car-free)	37,287	37.3	47,417	43.0
1	42,606	42.6	43,598	39.5
2	16,207	16.2	14,884	13.5
3+	3,891	3.9	4,385	4.0
Total	99,991	100	110,286	100

Households				
-------------------	--	--	--	--

About 50% of the borough's residents live in CPZs. Car ownership patterns vary greatly by ward. The vast majority of households with 3+ cars live outside of CPZs; permit records show that only around 15% of households with 3+ vehicles are resident within the borough's CPZs.

- 3.6 Car usage makes a significant contribution to the borough's carbon emissions and air pollution. The council is seeking, through its Transport and Parking Strategies, to encourage a greater uptake of more sustainable modes of transport for those journeys. For example, a 5% reduction in visitors travelling by car would equate to over 20,000 fewer return car journeys, and would therefore make a significant contribution to reducing both air pollution and carbon emissions in Brent. Concerns about air quality were expressed by residents in the consultation and many understand the direct relationship with the need for behaviour change regarding car usage.
- 3.7 Following the November 2014 report, which focused mainly on visitor parking charges, the March 2016 Cabinet report proposed a number of changes to the council's wider policies and charging regimes for on-street parking. Cabinet agreed to consider all of these potential changes, subject to consultation with residents. Appendix H summarises the consultation activities undertaken. Appendix I summarised the responses received; and Appendix J sets out the qualitative opinions expressed by participants at focus groups. Over 3,300 questionnaire responses were received directly from over 25,000 parking account holders invited to participate; a response rate of 13%. Additionally, prior to the end of consultation, a box of almost 700 completed paper questionnaires were received from visitors to the Willesden Temple. These have been separately analysed as we were unable to determine whether the views expressed were of visitors to Willesden Temple, or those of Brent residents (see paragraph 10.3). The Temple responses show a very high degree of consistency between the respondents and differ significantly from the larger cohort in places, and this has been highlighted in the report.
- 3.8 Firm recommendations on the proposals are now being made to Cabinet in the light of the outcome of consultation. Each is set out in detail below.
- 3.9 Finally, Cabinet has committed to a programme of reviews of existing CPZs, including the boundaries, time of operation, assessment of the adequacy of Pay & Display and dual-use bays. This programme will need to include a review of the Wembley event day zone. This report does not seek to deal with wider concerns regarding CPZs which will be subject to this further review. A business case is in preparation which will be considered by officers at the June Investment Board, and then reported to Cabinet in the autumn.

4.0 Demand-Led Pay & Display Tariffs

- 4.1 There are currently over 700 Pay & Display machines installed in the borough's CPZs. Pay & Display bays are designated for short stay visits to businesses or homes within CPZs. Pricing policy seeks to ensure that there is a regular turnover of parking spaces. Pay & Display bay charges were last set in 2013. Motorists pay 20p for up to 15 minutes; and then £1 for 30 minutes, £2 for one hour, £4 for 2 hours, £6 for 3 hours, and £8 for 4 hours. Coin payments are charged a 50 pence cash transaction supplement to encourage channel-shift.
- 4.2 The general principle underpinning on-street pay and display parking is to provide a quick turn-over of spaces, allowing easy access for motorists who wish to make short visits to shop or conduct business; and therefore park nearby. If charges are set too low, parking bays will not be freed up and this principle would be undermined.

- 4.3 Within the 2015/16 Budget Report, approved by Cabinet on 15 December 2014, various measures were recommended which were expected to have a significant impact on budget expectations for the Parking service. This included an additional £100k growth in income which was anticipated from an increase in Pay & Display parking charges, focused on areas where excessive demand for spaces might be experienced. However, the proposal was subject to the outcome of a review of demand and usage of Pay & Display bays.
- 4.4 An analysis was undertaken of the potential need to increase Pay & Display charges, to improve the management of parking and traffic. The review was completed and its findings were set out in detail and reported to Cabinet in March 2016. The review concluded that the evidence did not support an increase in pay and display charges at this time. The overwhelming majority of respondents to the recent consultation exercise endorsed this conclusion. It is recommended that pay and display charges are not increased at this time.

5.0 Visitor Household Permits

- 5.1 The council currently offers a Visitor Household permit to residents. This is a paper permit which displays the name of the resident's street. It allows visitors to park in any resident or shared use bay, but only in the named street (or part of the street) within the Controlled Parking Zone shown on the permit. The permit may be displayed on any vehicle, regardless of engine size or ownership. Each household may only hold one Visitor Household permit, which is currently priced at £110. Almost 4,000 Visitor Household permits are in use, with the associated income making a substantial contribution to the cost of managing and enforcing Controlled Parking Zones.
- 5.2 In September 2012 the council agreed in principle that the annual Visitor Household permit should be withdrawn. The concern expressed then was that its relatively low cost could create an incentive for some residents to purchase a Visitor Household permit for a vehicle of their own, to avoid the higher cost of a resident's permit. The prevalence of this practice is not known but anecdotal evidence suggests that a very small minority may be abusing the permit. An increase in the cost of the Visitor Household permit could substantially mitigate this risk (see paragraphs 5.9 and 5.10 below) by limiting the cost difference between this permit and resident permits to the 10% of vehicles in the proposed High emission charge band.
- 5.3 The Executive recognised that parking provision for visitors was a key concern for residents who require personal support or care. Any withdrawal of the Visitor Household permit was therefore explicitly linked to ensuring that such residents would not be disadvantaged, and officers were asked to develop an alternative visitor permit to meet their needs. This was a complex proposition which had taken time to bring forward.
- 5.4 Residents requiring formal care for *critical* or *substantial* needs can have their formal carers' parking needs met through the council's Essential User Permit scheme. This is provided to public and voluntary sector staff who provide care to residents in CPZs. Nonetheless, many residents with critical or substantial needs do also receive informal care and support, often from friends or family members who would not qualify for an Essential User Permit. In addition, all residents with *moderate*, *low*, or unknown care needs are entirely dependent on informal care and support.
- 5.5 Many residents understandably use their Visitor Household permit to ensure that people providing them with care or support can park when making a visit.

- 5.6 In March 2016 the Cabinet agreed to consult on replacing the Visitor Household permit with a proposed new Care and Support permit, with a specific condition that the permit should only be used for that purpose. It was noted that resources to police the use of the proposed permit would necessarily be limited.
- 5.7 The consultation responses showed that 61% of respondents opposed the withdrawal of the Visitor Household permit, with only 27% in favour. Similarly, the Willesden Temple responses were also opposed to the withdrawal. Concerns were expressed that some residents genuinely in need of care and support might be deterred from applying for the proposed new permit, for example by the new restrictions on usage. Other respondents commented that the Visitor Household permit was helpful to residents in ensuring that visiting building trades and logistics vehicles could park nearby.
- 5.8 Given the clear popularity of the current permit, and concerns regarding any alternative for people needing care and support, it is proposed that the existing Visitor Household permit should be retained. This would maximise its potential use to meet informal care and support needs, provide access to customers' households for business vehicles, and would appear to be the strong preference of residents within CPZs.
- 5.9 However, it is also proposed to increase the cost of the Visitor Household permit to better align it with the cost of resident permits. This would also ensure a consistent approach is taken with the new price structure for individual visitor permits, seeking to manage the demand for parking spaces by visitors. In order to avoid the risk of disproportionately affecting those CPZ residents who receive care, the increase in price of Visitor Household permits would be less than the increase in price of daily visitor permits. It is proposed that the annual cost of a Visitor Household permit would increase, from the level set: £108 in 2013; £109 in 2014; £110 in 2015; to £163 in 2016/17. The £163 charge is the same as the highest cost resident permit for vehicles in the proposed Standard emissions band. This is a lower level of price increase than that applied to visitor vouchers for visits of more than 2 hours. The Visitor Household permit would continue to provide good value to residents receiving at least one regular visitor per week on average. £163 would be equivalent to 55 four-hour visitor permits costing £3 each; or 109 two hour permits costing £1.50 each. This level of pricing would also substantially reduce the risk of potential abuse of the scheme – only permits for resident vehicles in the High emissions band would be more expensive. This narrowing of potential abuse would also assist in targeting audit and enforcement activity. Finally, the proportionately lower increase for Visitor Household permits would deliver an administrative efficiency by providing an incentive for residents to switch to this product instead of making repeated purchases of daily visitor vouchers.
- 5.10 To align the scheme with resident permits, it is also proposed to make future annual adjustments to the price of this permit on 1 April each year, to ensure the cost continues to be identical to that for a third Resident's permit for vehicles in the Standard carbon emission charge band (see Appendix E).

6.0 Visitor Parking Pricing Scheme

- 6.1 Daily visitor parking permits allow residents who live in Controlled Parking Zones to receive visitors during a Zone's operational hours; there is no limit on the numbers which can be purchased. Daily visitor parking permits are currently priced at £1.50 per day. This price has not increased since 2013 when virtual permits replaced the former scratch card system.
- 6.2 Residents can book a parking session for their visitor online, over the telephone or by text message, providing they have a parking account. In 2014/15 residents booked just over 411,000 visitor parking sessions; in 2015/16 bookings increased to more than 451,000.

- 6.3 A proposal to increase daily visitor parking charges to better manage demand was endorsed by Cabinet in the December 2014 budget report; the report demonstrated that the price of visitor parking was markedly cheaper in Brent compared to neighbouring boroughs; and that an increase in the tariff would help control levels of demand.
- 6.4 In November 2015, Members received a detailed report on visitor parking charges. Cabinet took a decision to link the cost of visitor parking to the cost of public transport to encourage people to consider swapping to more sustainable modes of transport. The cheapest return fare on public transport is £3; and the capped cost of bus fares for a single day is £4.50. Cabinet also agreed to a single pricing structure borough-wide to ensure fair pricing for less well-off residents living in high demand areas. A full analysis of the relevant issues taken into account in arriving at these decisions was contained within the [16th November 2015 Cabinet report](#). Excerpts from the report are attached as Appendices B-D.
- 6.5 These proposals were further refined in the [14th March 2016 Cabinet report](#). The report made a revised proposal to retain the current £1.50 charge for visitor parking permits of up to 2 hours duration. This would freeze the cost for short term visitors at the current rate, with the aim of encouraging a reduction in the amount of time vehicles are parked on-street. Additional 2 hour bookings could be made to extend a visitor parking stay, but for any stays of more than 4 hours duration a single payment of £4.50 for an all-day permit would offer better value.
- 6.6 The council's Parking Strategy states that charges should be reviewed regularly to ensure that they are consistent with charges made in other boroughs. Brent's Controlled Parking Zones are located in two distinct parts of the borough. The majority are in the south east of the borough, which borders Westminster, Kensington & Chelsea, Hammersmith & Fulham, Camden, Ealing and Barnet. The remainder are largely in the south west of Brent, closer to Ealing than any other borough.
- 6.7 Cabinet has previously sought to align charges in Brent close to the level set by its outer London partner authorities, LB Ealing and LB Hounslow, rather than the high charges common in inner London. Cabinet has also taken the view that pressures on parking demand in Brent's CPZs are significantly more intense than in outer boroughs on the edge of London, such as Harrow and Barnet. The table below sets out the prices of daily visitor parking permits in all neighbouring boroughs, alongside current proposals for Brent. The most expensive charging regimes are at the head of the table; least expensive at the foot.

Borough	Products Offered	2 Hours	4 Hours	All Day
Westminster	Pay and Display only. 4 hour max stay*	£3.40- £9.80	£6.80- £19.60	N/A
Kensington & Chelsea	Pay and Display only. 4 hour max stay*	£2.40- £9.20	£4.80- £18.40	N/A
Hammersmith & Fulham	Hourly charge	£3.60	£7.20	£14.40**
Camden	Hourly charge, with all day cap	£1.92	£3.84	£6.49
Hounslow	Hourly charge	£1.50	£3.00	£6.00**
Brent (proposed)	2 hour, 4 hour and all day	£1.50	£3.00	£4.50
Ealing	Hourly charge, with all	£1.20	£2.40	£4.50

	day cap			
Harrow	All day	£1.69	£1.69	£1.69
Brent (current)	All day	£1.50	£1.50	£1.50
Barnet	All day	£1.00	£1.00	£1.00

* Max stay limits vary across these boroughs

** Do not offer an all-day visitor permit. Price is based on the cheapest cost of an 8 hour booking

- 6.8 As anticipated, consultation respondents expressed a majority view against increasing the price of visitor permits, although over a quarter did favour the increase (67% opposed; 26% in favour). Almost 3,300 responses were received. The Willesden Temple responses were against raising prices. At the focus group discussions, concerns were expressed about the imbalance between the supply of parking spaces in the borough and the current demand amongst residents and visitors. It was felt this should be a priority for the Council to address. Other respondents were not convinced that the proposals would protect the environment or solve identified parking problems. It was also suggested that if parking charges had to increase this should be done incrementally.
- 6.9 When taken together, the quantitative and qualitative results paint a mixed picture, although the level of opposition to the proposed price changes was less than expected. In line with the council's previously agreed policy position, strong weight does need to be given to the traffic management, carbon reduction and public health (air pollution) considerations. In light of: the mixed feedback received; the continued growth in visitor parking bookings; and the proposal to retain the Visitor Household permit; there continues to be a pressing need to tackle the severe pressure on demand for parking space in the borough. It is therefore proposed to implement the revised pricing structure as set out in the March 2016 Cabinet report (referred to in paragraph 6.5 above). The proposed new charging regime for visitor permits would require a change to be made to the terms and conditions of visitor permits. Formal consultation on the corresponding amendment to the relevant Traffic Management Order would therefore be required. It is proposed to delegate the final decision, following formal consultation on the TMOs, to the Strategic Director Regeneration & Environment, in consultation with the Lead Member for Environment. A target date of 1st October 2016 is proposed for implementation of the changes to visitor parking permit charges.

Cap on Visitor Permits

- 6.10 The March 2016 Cabinet report also proposed introducing a financial cap of £350 on the value of visitor permits which any household could purchase. 49% of respondents opposed this approach to capping visitor permit bookings; 39% were in favour. Many respondents to the consultation felt that a cap imposed on residents by the council would not be appropriate; others agreed with the principle but not the mechanism.
- 6.11 Further research has been conducted on the pattern of visitor permit bookings, in the light of residents' feedback. This has identified that a disproportionate number of visitor bookings are made by a very small number of households. In 2015/16, 6.3% of all visitor permit bookings were made by just 64 households, who each made more than 300 bookings. In the light of the proposal to continue to offer the Visitor Household permit to cover regular visits to most households, it is considered reasonable to introduce a high level cap on individual bookings. This would impact on very few households, but would contribute to reducing demand for space. It is therefore proposed to introduce a maximum annual cap of 300 bookings per household, commencing from 1st April 2017, instead of the £350 financial

cap originally proposed. This approach will also enable targeted investigation of potential fraud.

7.0 Resident Parking Permits

- 7.1 Parking permits are available to residents in CPZs for their own cars, subject to proof of ownership.
- 7.2 Permit Application Restrictions: All of the 56,000 households (houses and individual flats) located in CPZs are currently entitled to purchase up to three resident permits. This can be contrasted with the 33,000 spaces available within CPZs. Limiting the number of permits available per household would reduce demand for on-street parking space. There are about 600 'three permit' households within CPZs. Residents were consulted on a proposal to reduce the maximum number of resident permits issued to a household down to two. Responses to the consultation were 56% in favour of reducing permit entitlement to 2 vehicles, and 37% against. The Willesden Temple responses were against the reduction. Focus groups supported this proposal on balance, although anxiety was expressed that: there could be a further loss of front gardens to accommodate vehicles; and that larger families, and those with grown up children living at home, would be unfairly penalised. People also asked for time to adjust if a new restriction was to be implemented. It is therefore proposed to agree this change in principle, in line with public support, but delay the target date for implementation until 01st April 2017. This will enable further work to be undertaken on the equalities impact on the 600 affected households and consideration of mitigation measures.
- 7.3 Consolidation of Carbon Emission Bands: Resident parking permits currently cost up to £302 (see price schedule attached as Appendix G). The council's emissions-based resident permit scheme currently has 7 categories of vehicle, linked to data held by the DVLA. It is considered that the high number of categories provides a lack of clarity in steering motorists to choose vehicles which produce a lower level of carbon emissions. Marginal differences in permit costs provide little incentive to change. In comparison, a recent survey of London motorists concluded that the average annual cost of car ownership in the capital was over £3,400 p.a., much greater than the cost of differences in resident permit prices. In order to provide more clarity in 'nudging' vehicle owners towards low emission vehicles, the consultation asked whether there was support for simplifying the emissions based permit charges to just 3 categories - for *low emissions* (less than 110 gCO₂/km, *standard emissions* (110-200 gCO₂/km) and *high emissions* (more than 200 gCO₂/km) vehicles.
- 7.4 Very few comments were received on this proposal, but 44% of respondents favoured the change; with 30% against. 57% of Willesden Temple respondents were opposed, with 42% neutral on the proposals. The council is aware of residents' concerns regarding air pollution which is a growing, London-wide issue. On balance, it is proposed that this change be implemented from April 2017. Across the board, the proposal has been designed to be revenue-neutral. For vehicles in Bands 1 and 7 of the current system, this reform would have no impact on permit prices (although Band 1 vehicles would be affected by the introduction of a minimum charge – see para 7.5 below). Vehicles in Band 6 of the scheme (201-240 gCO₂/km) would see an increase in their permit price, as they would move into the new 'high emission' band with the current Band 7. For vehicles in Bands 2-5, it is proposed to standardise permit charges at the current Band 3 level. Of these, only Band 2 vehicles (20% of these vehicles) would see an increase in charges; 80% of vehicle owners in these four Bands would see a reduction in the cost of their permit or no change. (See Appendix E).

7.5 Minimum Charge: Consultation focused on a proposal to introduce a minimum permit charge of £25. All motor vehicles contribute to carbon emissions; the administrative cost for issuing a permit does need to be covered; and all vehicles take up on-street parking spaces and benefit from CPZ management. This proposal received a majority of responses in support, and is now recommended for introduction from 1st April 2017. 46% of respondents supported this proposal; 40% were opposed. The Willesden Temple responses were opposed to the minimum permit charge.

7.6 Diesel Surcharge: Residents' views were sought on whether an additional surcharge of £25 should be levied on diesel powered vehicles, given concerns about NO_x and particulate emissions. The previous report to Cabinet advised:

Evidence shows that fine and ultra-fine particulate matter present in air pollution increases the risk of cardiovascular morbidity and mortality. Conventional vehicles are responsible for 41% to 60% of air pollutants in the UK, which have an impact on cardiovascular and respiratory diseases. To manage air quality, the government has set national air quality objectives, which have been put in place to protect people's health. Where a local authority finds any places where these objectives are not likely to be achieved, it must declare an Air Quality Management Area there. This could be just one or two streets, or a much bigger area. A map showing the Air Quality Management Areas within Brent is attached at Appendix [F]; these areas closely relate to the parts of the borough covered by CPZs.

7.7 Diesel emissions have recently featured in a number of high profile news stories. It is now known that emissions from diesel vehicles under normal driving conditions can be considerably higher than those measured by tests. In addition, two leading international car manufacturers have been discovered to have altered test results. High levels of emissions from diesel vehicles in UK urban areas are estimated to cause more than 20,000 additional deaths per year. However, many respondents to the consultation expressed concerns that until recently advice at a national level had sought to persuade motorists to switch to diesel vehicles to reduce their carbon emissions; several commented that it was unfair that an additional charge should be levied as they had acted in good faith. 47% of respondents opposed this proposal; with 39% in favour. The Willesden Temple responses were opposed to the diesel surcharge. Overall, those opposed felt it would be unfair to introduce this surcharge given previous encouragement by central government. At the very least, residents argued that implementation should be at a later date.

7.8 Given the clear evidence of health impact, it is proposed that Cabinet agrees in principle to the introduction of a £25 diesel surcharge to give a clear signal to motorists, but subject to a report presented to Cabinet in two years' time, allowing residents time to adjust to an implementation date of 1st October 2018.

7.9 Vehicle Size: Residents were consulted on a proposed reduction in the size of vehicles eligible for a residents parking permit. Currently the council restricts permits to vehicles with a maximum weight of 5 tonnes (weight is used as a proxy for size to facilitate access to accurate vehicle data). It was suggested that this limit could be reduced to the same as that set by the neighbouring borough of LB Camden, where the maximum weight allowed is 3.5 tonnes. This proposal was supported by an overwhelming majority of respondents to the consultation and this change is therefore recommended for introduction from 1st April 2017.

8.0 School Parking Permits

8.1 Parking pressure experienced by residents in close proximity to schools continues to be an issue, particularly during the morning drop-off and evening pick-up times when parents and carers often park indiscriminately. This causes congestion and also has safety implications

for pupils, school staff and visitors. In September 2012 the then Executive agreed a recommendation to phase out the special permit for teachers which had been introduced to assist schools in CPZs with recruitment and retention difficulties. A temporary concession was given to allow renewal up to September 2016 after which time all school permits were intended to cease.

- 8.2 This policy has been reviewed in light of a number of concerns. There is a need for further school places within the borough and a school expansion programme is under way. There is often no additional land and school expansions are being accommodated within existing footprints. As a result the amount of space to provide off street parking for staff is not always achievable, and there is a risk schools may not engage with the expansion programme if parking spaces are lost and no alternative is available.
- 8.3 Schools in the more deprived wards, where the majority of CPZs are located, believe their recruitment of teaching staff will suffer compared with schools which have on-site car parks and/or are not in CPZs. Teacher recruitment is an ongoing issue for primary schools across London, with this in mind consideration has been given to approving options that allow the purchase of permits.
- 8.4 Experience has shown that complaints from residents about the parking and driving behaviour of parents and carers greatly outweigh any concerns expressed about school staff parking on-street.
- 8.5 An alternative policy framework has therefore been developed to:
- Recognise the need to treat schools no less favourably than local businesses by allowing schools to purchase up to 3 business permits for allocation to staff.
 - Provide an incentive for schools to actively engage or remain engaged in travel planning to reduce the school sites' overall demand for car parking spaces
 - Provide increased incentives for schools to achieve higher levels of travel accreditation, thereby further reducing parking demand.
 - Ensure that residents' interests are also protected by minimising the on-street parking demands made by schools.
 - Assist in teacher recruitment and retention, through schools being able to offer support to key staff who need to travel by car to the workplace in a managed way.
- 8.6 Currently all businesses in CPZ areas are entitled to three business permits. In addition, more schools are coming forward as Free Schools and Academies operating on a business model, and therefore entitled to business permits. In order to provide equity it is proposed to allow all schools located within CPZs to purchase up to 3 business permits for staff at the same price, terms and conditions as local businesses. These permits will be restricted to the CPZ within which the school is located.
- 8.7 The council actively encourages all schools to produce a School Travel Plan (STP) which includes information about the school and pupil & staff modes of travel. STPs are aimed at reducing car use and must include a measurable action plan outlining the actions that the school intends to take to meet its targets and objectives. More information on the benefits of School Travel Plans is included in Appendix G.
- 8.8 There are three levels of independent accreditation for school travel plans: bronze; silver; and gold. These are awarded in accordance with the activities undertaken, evidence provided and the commitment displayed by the school to reduce congestion and pollution utilising modal shift targets for pupils and staff. Currently, 34 Brent schools have a travel plan approved by TfL of which 17 have a bronze accreditation, 3 silver, and 14 gold. These

schools are actively reducing the proportion of children and staff who travel to school by car. This achievement could be jeopardised if the incentive of obtaining parking permits for key school staff is removed. Any reduction in the number of schools with travel plans could have the negative outcome of increasing parking and road safety problems in the vicinity of schools.

- 8.9 To provide an incentive for schools to seek travel plan accreditation, it is proposed to allow all schools in CPZs with accredited STPs to also purchase additional school permits for staff. Schools with bronze accreditation would be allowed three additional permits; schools with silver, six; and schools with gold accreditation, nine. School permits would be a new permit offering a 25% discount on the price of business permits, recognising that staff only require parking space near the school during term time. Terms and conditions would be based on the Essential User Permit available to care and health staff, rather than the business permit model.
- 8.10 Consultation responses were overwhelmingly in favour of the proposals set out above. Participants in the focus groups did not feel that the proposed scheme would have a significant detrimental impact on parking for residents and their visitors. Respondents confirmed the view that parent parking is the main concern, rather than school staff.
- 8.11 However, more generally, the council is aware of residents' concerns about the effectiveness of travel plans in managing issues relating to pick up and drop off at schools. A policy on traffic management around schools is being developed for consideration at a future Cabinet meeting.

9.0 Parking Support for Traders

- 9.1 Currently residents can book visitor permits for smaller trade vehicles occupying a single bay, or allow such vehicles to use their Visitor Household permit. Larger vehicles are required to apply for a bay suspension for which a charge is levied. New proposals for how the parking needs of traders, particularly businesses based in Brent, could be met were put forward in the recent consultation exercise. There was strong support for the principle that the parking needs of traders working in CPZs should be considered.
- 9.2 In particular, a proposal to introduce an 'all zones' CPZ permit for traders was strongly supported in the consultation. This could allow traders to attend several jobs in a single day across the borough with minimum administration, and with control in the hands of the trader, rather than relying on residents' access to parking accounts. It is proposed that a permit along these lines be developed with the involvement of local businesses and offered at a price: affordable to businesses; but sufficient to deter purchase by commuters.

10.0 Consultation

- 10.1 A wide range of consultation methods were employed to consult stakeholders on the proposals outlined in the March 2014 Cabinet report including:
- 25,698 letters and 24,345 emails sent to all CPZ residents who had a parking account
 - A briefing session for Resident Associations (and residents) located in CPZs
 - Press release and consultation proposals went live at launch of online survey.
 - Parking officers attended all relevant Brent Connects Forums
 - A Web survey – over 3,300 responses were received
 - Brent Website featured the consultation on the home page with a running banner.
 - Respondents could request a paper questionnaire and pre-paid reply envelope
 - Paper copies of the consultation were made available at customer services desk

- Facebook and Twitter information were regularly updated
- Information provided in two successive editions of 'Your Brent' with 33k circulation
- Brent & Kilburn Times initiated article on 4th May edition
- A letter emailed to all head-teachers of schools in CPZs
- Assisted consultation responses from Disability & Politics User group at Brent Mencap
- Three Focus Group sessions organised for stakeholders to collect qualitative input
- A letter and email to all businesses with parking accounts

10.2 A summary of consultation responses is attached as Appendix I. The report of the focus group discussions is attached as Appendix J.

10.3 Before the close of consultation a box containing 688 completed paper questionnaires were received, marked as Willesden Temple. These have been separately analysed, as the equalities section of the survey was not completed; and so we were unable to determine whether the views expressed were of visitors to Willesden Temple or Brent residents. An analysis of the Willesden Temple responses is attached as Appendix K.

11.0 Legal Implications

Pay & Display - Legal Implications

11.1 Although the Mayor of London's Transport Strategy has now superseded the earlier Traffic Management and Parking Guidance (TMPG) for London, the boroughs continue to rely on the TMPG document as an authoritative interpretation of the legal framework. It advises:

"(2.23) The level of parking charges must be set for traffic management reasons, such as to ration available space and ensure that there is a rapid turnover of parking spaces, rather than to maximise revenue. This is because section 122 of the Road Traffic Regulation Act 1984 does not include the maximisation of revenue from parking charges as one of the relevant considerations to be taken into account in securing the safe, expeditious and convenient movement of traffic".

11.2 Whilst it is reasonable for a Council to take due regard of estimated costs and income arising from the management of parking, it is not lawful for a local authority to use the Road Traffic Regulation Act 1984 to justify imposing charges to raise revenue.

11.3 Following the review, there is insufficient evidence to support a price increase on traffic management grounds.

Visitor Parking Pricing Scheme - Legal Implications

11.4 Under section 45 of the Road Traffic Regulation Act 1984 (RTRA 1984), a local authority has powers to designate parking places on the highway, to charge for use of them, and to issue parking permits for a charge.

11.5 Section 55 of the RTRA 1984 makes provision for the monies raised under section 45 of the RTRA 1984, in that it provides for the creation of a ring-fenced account (the SPA – Special Parking Account) into which monies raised through the operation of parking places must be placed, and for the application of any surplus funds. Any surplus generated is appropriated into the Council's General Fund at the year end and can be spent on matters defined in section 55(4) of the RTRA 1984 Act (mainly transport and highways matters, which are listed in the Act).

- 11.6 Section 122 of the RTRA 1984 imposes a general duty on local authorities when exercising functions under the RTRA. It provides, insofar as is material, as follows:

"(1) It shall be the duty of every local authority upon whom functions are conferred by or under this Act, so to exercise the functions conferred on them by this Act as (so far as practicable having regard to the matters specified in subsection (2) below) 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..."

(2) The matters referred to in subsection (1) above as being specified in this subsection are—

- (a) the desirability of securing and maintaining reasonable access to premises;*
- (b) the effect on the amenities of any locality affected and (without prejudice to the generality of this paragraph) the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run;*
- (bb) the strategy prepared under section 80 of the Environment Act 1995 (national air quality strategy);*
- (c) the importance of facilitating the passage of public service vehicles;*
- (d) any other matters appearing to the local authority to be relevant"*

- 11.7 Although the Mayor of London's Transport Strategy has now superseded earlier Traffic Management and Parking Guidance (TMPG) for London, the boroughs continue to rely on the TMPG document as an authoritative interpretation of the legal framework. It advises:

"(2.23) The level of parking charges must be set for traffic management reasons, such as to ration available space and ensure that there is a rapid turnover of parking spaces, rather than to maximise revenue. This is because section 122 of the Road Traffic Regulation Act 1984 does not include the maximisation of revenue from parking charges as one of the relevant considerations to be taken into account in securing the safe, expeditious and convenient movement of traffic".

- 11.8 This interpretation of the RTRA 1984, in the context of on-street charges, is widely accepted. Case law supports the view that the Act's purpose is not revenue-raising and this is set out in the judgements in the cases of *R (on the application of Cran) v LB Camden [1995]* and *R (on the application of Attfield) v London Borough of Barnet [2013]*. The British Parking Association's Parking Practice Notes "1 - Charging for Parking" (Revised August 2011) emphasises this point by quoting the Camden judgement, saying that the RTRA 1984:

"...is not a fiscal measure. It contains no provision which suggests that parliament intended to authorise a council to raise income by using its powers to designate parking places on the highway and to charge for their use".

In the *Attfield v Barnet* case, the Court ruled that the RTRA 1984 did not authorise a local authority to use its powers to charge for parking in order to: raise surplus revenue for other transport purposes funded by the Council's general fund; to defray other road transport expenditure; and reduce the need to raise income from other sources, such as fines, charges and council tax.

- 11.9 Should the revision to visitor parking charges be approved for implementation, this would require the amendment of the existing Traffic Management Order (TMO) under the Road Traffic Regulation Act 1984.

12.0 Financial Implications

Pay & Display - Financial Implications

- 12.1 The December 2014 budget report assumed that an increase in visitor parking charges would lead to an increase in income of £795k p.a. from 2016/17, and that an additional £100k p.a. would be derived from the introduction of demand-led pay & display charges. This was expected to result in additional income of £895k in 2016/17 and subsequent years.
- 12.2 If the recommendation not to proceed with increasing Pay & Display bay charges is agreed the £100k additional income p.a. assumed in the December 2014 Budget report would not be achieved. However, it is anticipated that additional net income would be generated by the proposed increase in charges for visitor permits, together with additional enforcement income which would make up the shortfall. No change in budget assumptions for 2017/18 onwards would therefore be required if the coherent package of recommendations made in this report are agreed for consultation.

Visitor Parking Pricing Scheme - Financial Implications

- 12.3 The table below forecasts the total income which would be generated by agreeing the proposed increases set out in this paper. The forecast assumes a baseline level of demand derived from the 2015 calendar year, and an overall reduction in demand (see Appendix K).

Option Description	Product Split	Transaction Volumes	Forecast Income	Increase
Current: £1.50 All day	N/A	451,119	£676,679	-
Proposed: £4.50/£3.00/£1.50 for: All day 4 Hours 2 hours; with associated demand reductions	40% 30% 30%	451,119	£1,309,188	£632,509

For budget planning purposes, the estimated increase in net visitor parking income is £632k p.a. as shown in the table above. It is anticipated that the proposed price increase for Visitor Household permits (see section 5) would increase income by an estimated additional £218k. In total therefore net income could be expected to increase by £850k p.a. This is a shortfall of £45k compared to the income anticipated in the December 2014 Budget report. However, this shortfall could be closed by 2017/18 through efficiency savings and additional enforcement income. No change would therefore be required to budget planning assumptions from 2017/18 onwards.

- 12.4 If the target date for implementation of 1st October 2016 is met, the estimated additional income would be limited to £425k in 2016/17, resulting in a budget pressure of £470k from the total income of £895k from charge increases assumed in the December 2014 budget report. The budget pressure will need to be managed and closely monitored.
- 12.5 The financial forecast does not factor in the possibility of customers stockpiling the current all day £1.50 permit prior to the price increase taking effect. This would have the effect of increasing visitor parking sales in the immediate short term, but lead to a reduction in sales in the following period. It may be possible to mitigate the impact of stockpiling, however.
- 12.6 Charges for parking are designed to help regulate demand for the limited spaces available and to improve the flow of traffic in the borough. As in many other areas of local authorities' activities, an estimate of the financial impact of changes in pricing policy - in this case an increase in the income likely to be raised – needs to be made, in order to ensure that the

budget reflects the requirement to use such income to fund matters which are listed and set out in section 55(4) of the Road Traffic Regulation Act 1984. Brent invests considerably more in funding such costs than the total income that it raises from parking charges. In 2014/15, the £8.957m surplus on the parking account was used to cover the revenue cost of the Transportation service (£2.091m) and make a contribution of £6.866m to the cost of concessionary fares – this covered less than half of the total expenditure incurred by the Council on concessionary fares (£15.913m in 2014/15).

Visitor Household Permits - Financial Implications

- 12.7 For budget planning purposes, replacing the Visitor Household permit (at a cost of £110 p.a.) with a new Carer's permit (costing £163 p.a.) could be expected to result in an increase in income of £218k.

Resident Permit proposals – Financial Implications

- 12.8 If the proposal to reduce permit entitlement from 3 vehicles to 2 is implemented, there could be a loss of permit income to the parking account of about £100k. This may be mitigated if sales of Visitor Household permits increase to cover additional visitor parking.
- 12.9 There would be no net impact from the proposals to consolidate the emissions-based permit scheme from 7 bands to 3, and the introduction of a minimum annual charge of £25 for permits, provided both of these proposals are agreed together.

School Permits - Financial Implications

- 12.10 The current level of income arising from issuing school parking permits is £28,000 per annum.
- 12.11 The maximum number of permits which might be issued to the 43 schools located within CPZs would be 240. This could potentially provide an income of £59,000 p.a. to contribute to the cost of managing and enforcing CPZs. If a more realistic 50% uptake is achieved this would result in approximately 120 permits issued to schools, which would generate gross receipts of approximately £29,500 and net revenue of £25,500. This is close to the level of current receipts from permit sales to schools. This would help to provide a balanced budget from which to continue to cover the cost of maintaining and enforcing the Council's CPZs.
- 12.12 The new permit, as existing permits are, will be subject to annual adjustment on 1 April based on the most recent available Retail Prices Index (RPI) data published by the Office for National Statistics, and rounded to the nearest pound. This will be the January RPI figure, which is published on 20 February each year.
- 12.13 There will be miscellaneous costs in introducing the new permit, subject to approval, which can be met from the existing parking budget.

13.0 Diversity Implications

The associate Equalities Analysis has focused on two specific issues: those relating to the Visitor Household permit; and the proposal to reduce household entitlement to resident permits from 3 to 2.

Visitor Household Permit - Diversity Implications

- 13.1 S149 of the Equality Act 2010 requires the Council to have due regard to the need to eliminate discrimination, and advance equality of opportunity and foster good relations between those who share a protected characteristic and those who do not. An Equality Analysis of the proposals was undertaken and included in the 16th November 2015 report agreed by Cabinet.
- 13.2 Cabinet was concerned that an increase in visitor parking charges could potentially affect those residents who live in CPZs and receive visitors who provide them with care or support. This may be particularly relevant to elderly residents, or those with disabilities. However two measures are already in place which will mitigate against this impact: the Essential User Permit; and the Visitor Household permit.
- 13.3 The Essential User Permit is issued by the Council to charitable and public sector organisations which provide essential services including formal residential and community care to people who live or work in Controlled Parking Zones. Residents who receive care visits from an Essential User Permit holder will be unaffected by the proposal to increase visitor parking charges.
- 13.4 The Visitor Household permit would continue to offer a significantly cheaper alternative to daily visitor permits for those residents who receive regular visitors to their property. Residents who purchase this permit would be affected to a lesser extent than other residents by the proportionately lower increase in the cost of this permit compared to other visitor permit bookings for visits of more than 2 hours. The purchase of this permit by those residents who receive care or support visits means that they would not be disproportionately affected by the proposals to increase visitor parking charges.
- 13.5 Resident permit restriction: The proposal to restrict the purchase of resident permits to 2 permits per household from the current entitlement of 3 is aimed at enabling the Council to better control demand for kerbside parking space within CPZs, to encourage take up of more sustainable modes of transport to improve air quality and reduce carbon emissions. An analysis using data from parking account holders indicates that approximately 600 households would potentially be affected by the proposed restriction. (See Equalities Analysis attached as Appendix M).

Background Papers

19th September 2012 Executive report – Parking service simplification and pricing
15th July 2013 Executive report – Statutory consultation on proposed changes to parking tariffs, charges and permits
15th December 2014 Cabinet report – Budget 2015/16 and 2016/17
[16th November 2015 Cabinet report](#) – Visitor Parking Charges
[14th March 2016 Cabinet report](#) – On-Street Parking Service Offer and Charges in Controlled Parking Zones

2015 Parking Strategy
2016 Long Term Transport Strategy

Appendices

Appendix A – 2015 Parking Strategy: Policy and Operational Objectives
Appendix B – Excerpt from November 2015 report on visitor parking bookings
Appendix C - Average visitor parking bookings per household, per CPZ
Appendix D – Vehicles with 100+ visitor parking bookings by CPZ
Appendix E – Consolidation of resident permit price bands
Appendix F - Air Quality Management Areas within Brent
Appendix G – School Travel Plan Objectives
Appendix H - Parking Consultation Activities
Appendix I – Consultation responses
Appendix J – Focus Groups report
Appendix K – Willesden Temple consultation responses
Appendix L - Assumptions made in financial modelling
Appendix M – Permit Restriction Equalities Analysis

Contact Officers

Gavin F. Moore
Head of Parking and Lighting
Phone: 020 8937 2979
Email: gavin.f.moore@brent.gov.uk

Operational Director, Environment and Employment Services: Chris Whyte
Brent Civic Centre
Engineers Way
Wembley HA9 0FJ
Tel: 020 8937 1234

LORRAINE LANGHAM
Strategic Director, Regeneration and Environment:

Appendix A – 2015 Parking Strategy: Policy and Operational Objectives

Policy objectives

The Council seeks:

- To improve the safety of all road users.
- To provide affordable parking spaces in appropriate locations to promote and serve the needs of the local economy.
- To assist in providing a choice of travel mode and enable motorists to switch from unnecessary car journeys, to reduce traffic congestion, carbon emissions and pollution.
- To promote carbon reduction and improved air quality by encouraging the use of vehicles with lower emission levels
- To support local businesses by facilitating effective loading and unloading, and providing allocated parking where appropriate.
- To provide the right balance between long, medium and short stay spaces in particular locations
- To achieve a turnover of available parking space in shopping and commercial areas, to maximise business activity and promote economic growth
- To assist the smooth flow of traffic and reduce traffic congestion.
- To enable residents to park near their homes.
- To facilitate visitor parking, especially by those visiting residents with personal care needs.
- To assist disabled people with their parking needs, and enhance their access to local shops and key amenities
- To prioritise parking controls to support the needs of local residents and businesses over event traffic.

Operational objectives

The Council aims:

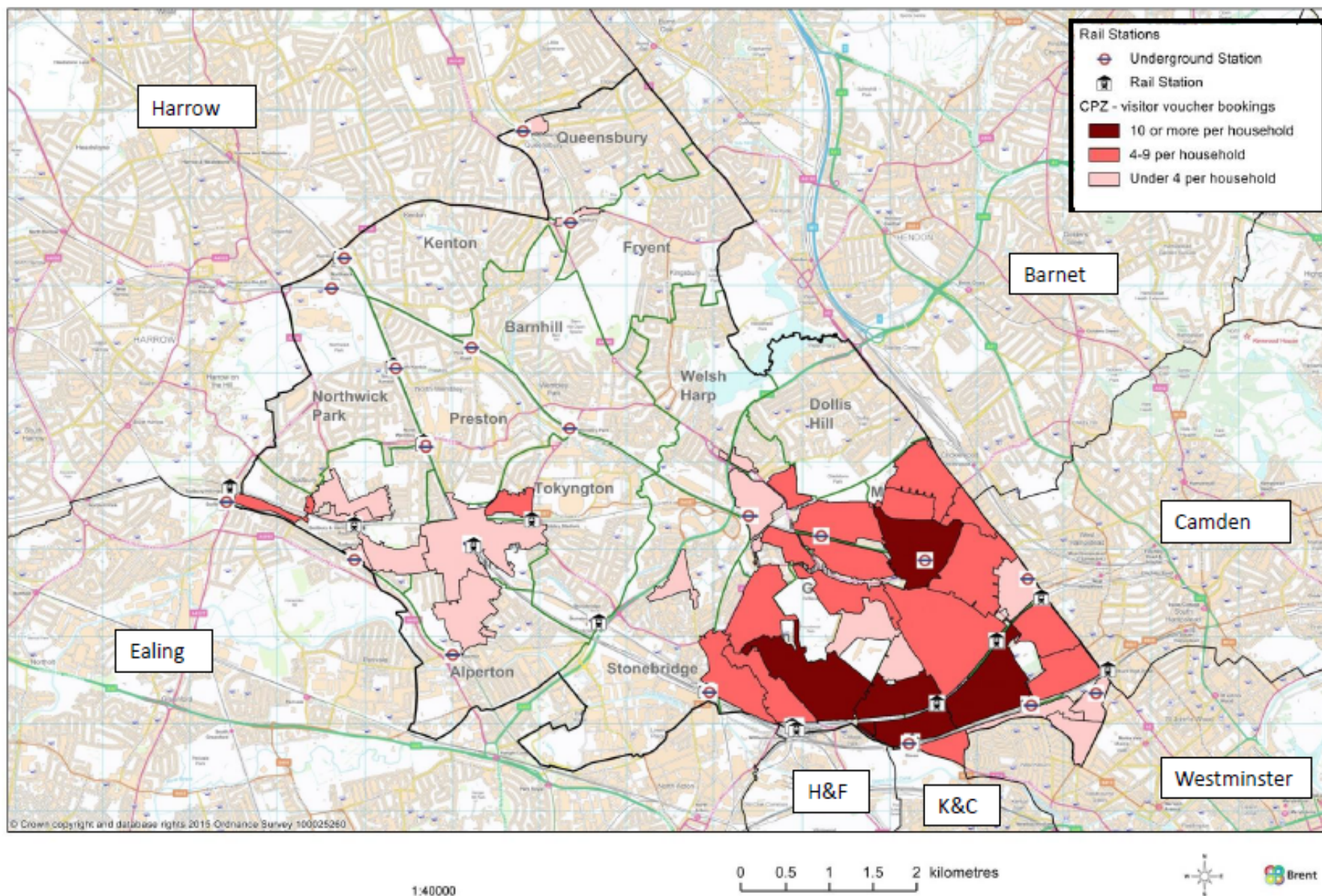
- To set a level of charges which balances demand and supply for parking spaces across the borough.
- To provide an efficient service which constantly seeks to improve.
- To be fair, consistent and transparent in our dealings with customers.
- To publish clear statistical and financial information on a regular basis.

Appendix B

Visitor Parking Usage

- 3.13 *It might be expected that the overall level of visitor permit usage would be generally level across the borough. That is not the case. The highest usage of daily visitor parking permits in Brent tends to be in the Controlled Parking Zones in the south-east of the borough, in particular those CPZs closest to central London. In contrast the lowest usage tends to be in CPZs to the west of the borough. Appendix [C] shows a map of Brent and highlights the average number of visitor parking bookings per household per CPZ in 2014/15. The map shows that the highest average bookings per household are in CPZs close to the borders with Westminster, Camden, Kensington & Chelsea and Hammersmith & Fulham (Kensal Green, Queens Park, Mapesbury, Brondesbury Park and Harlesden wards); and CPZs close to Willesden Green station (Willesden Green, and Dudden Hill wards).*
- 3.14 *Analysis of visitor parking transaction data in 2014/15 also highlights evidence of commuter parking. 80 vehicles had 150 or more booked visitor parking sessions in the year 2014/15. A further 180 vehicles had between 100 and 149 booked visitor parking sessions. These bookings tend to be in CPZs in the south east of the borough, which contain London Underground and Overground stations in zones 2 and 3. A more detailed breakdown per CPZ is contained in Appendix C.*
- 3.15 *When making visitor parking bookings, residents are not required to indicate the purpose of the visit... We cannot categorically evidence whether a particular visitor parking booking has been for the purpose of commuting, or for a genuine visit. A number of regular visitors may, for example, be people providing care or builders working on domestic properties. However, given that households in CPZs currently have the option of purchasing an annual Visitor Household Permit for £110 (which offers better value than daily visitor parking permits if more than 73 visits are made), it is highly likely that a significant proportion of repeat usage is from commuters – particularly where more than 100 bookings have been made for the same vehicle. The current low price of £1.50 per parking session is likely to be contributing to this issue, as Brent's charge is much less than the visitor parking tariffs in CPZs across the border in all nearby boroughs except Barnet.*

Appendix C – Average visitor parking bookings per household, per CPZ



Appendix D – Vehicles with 100+ visitor parking bookings by CPZ

CPZ	Ward (s)	Occurrences of the same vehicle booking 100-149 sessions	Occurrences of the same vehicle booking over 150 sessions	Nearby Underground stations	Nearby Overground stations	Travel Zone (s)
KR_1	Queens Park, Kensal Green	16	4	Kensal Green	Kensal Rise	2
GC	Willesden Green	15	4	Dollis Hill, Willesden Green		2, 3
KQ	Queens Park	14	4	Kensal Green, Queens Park	Kensal Rise, Brondesbury Park	2
MW	Mapesbury, Dudden Hill, Brondesbury Park	14	8	Willesden Green		2
HW	Kensal Green, Harlesden	13	10	Willesden Junction, Kensal Green	Willesden Junction	2, 3
HY	Harlesden, Dudden Hill	13	3	Harlesden, Dollis Hill		3
KB	Kilburn, Queens Park	11	2	Kilburn Park, Queens Park	Kilburn High Road	2
GH	Willesden Green, Brondesbury Park	8	4	Dollis Hill, Willesden Green		2, 3
KD	Kilburn	8	6	Kilburn, Kilburn Park, Queens Park	Brondesbury, Brondesbury Park	2
KL	Queens Park, Kensal Green, Brondesbury Park	8	9	Kensal Green, Willesden Junction	Kensal Rise, Willesden Junction	2
H	Kensal Green	7	3	Harlesden, Willesden Junction	Willesden Junction	2, 3
KG	Queens Park	7	2	Kensal Green	Kensal Rise	2
KS	Brondesbury Park, Queens Park	5	5	Willesden Green	Kensal Rise, Brondesbury Park	2
MA_1	Brondesbury Park, Mapesbury	5	1	Willesden Green, Kilburn	Brondesbury, Brondesbury Park	2
GD	Dudden Hill, Willesden Green	4		Dollis Hill, Neasden		3
HS	Harlesden, Stonebridge	4		Harlesden, Willesden Junction	Willesden Junction	2, 3
KC	Kilburn, Queens Park	4	1	Kilburn Park, Queens Park	Kilburn High Road	2

CPZ	Ward (s)	Occurrences of the same vehicle booking 100-149 sessions	Occurrences of the same vehicle booking over 150 sessions	Nearby Underground stations	Nearby Overground stations	Travel Zone (s)
GM	Mapesbury	3	1	Willesden Green	Cricklewood	2, 3
KR_2	Kensal Green	3		Kensal Green, Willesden Junction	Kensal Rise, Willesden Junction	2
NS	Dudden Hill, Welsh Harp	3		Neasden		3
C	Wembley Central, Sudbury, Tokyngton	2	2	Wembley Central	Wembley Stadium	2,4
GB	Dudden Hill	2	2	Dollis Hill		3
K	Kilburn	2	2	Kilburn Park, Queens Park	Kilburn High Road	2
MA_2	Mapesbury	2	4	Willesden Green, Kilburn	Cricklewood	2,3
SH	Sudbury	2	1	Sudbury Hill	Subury Hill Harrow	4
GS	Willesden Green, Brondesbury Park	1		Willesden Green		2
KM	Kilburn	1		Kilburn Park, Queens Park	Kilburn High Road	2
MK	Brondesbury Park, Mapesbury	1	1	Kilburn	Brondesbury, Brondesbury Park	2
NT	Dudden Hill	1		Neasden, Dollis Hill		3
W	Tokyngton	1		Wembley Central	Wembley Stadium	4
GA	Mapesbury		1	Willesden Green	Cricklewood	3

Appendix E – Resident Parking Permit Prices

Current (2016/17)

Vehicle band	1	2	3	4	5	6	7
<i>Vehicle emissions (gCO₂/km) of passenger vehicles registered on or after 1 March 2001</i>	<i>Less than 110</i>	<i>110-130</i>	<i>131-150</i>	<i>151-175</i>	<i>176-200</i>	<i>201-255</i>	<i>255+</i>
<i>Cylinder capacity of engine (cc) of passenger vehicles registered before 1 March 2001 and goods carrying vehicles</i>	<i>Less than 1101</i>	<i>1101-1200</i>	<i>1201-1550</i>	<i>1551-1800</i>	<i>1801-2400</i>	<i>2401-3000</i>	<i>Over 3000</i>
Duration: 12 months							
<i>1st permit (£)</i>	<i>0</i>	<i>56</i>	<i>83</i>	<i>111</i>	<i>139</i>	<i>167</i>	<i>222</i>
<i>2nd permit (£)</i>	<i>40</i>	<i>96</i>	<i>123</i>	<i>151</i>	<i>179</i>	<i>207</i>	<i>262</i>
<i>3rd permit (£)</i>	<i>80</i>	<i>136</i>	<i>163</i>	<i>191</i>	<i>219</i>	<i>247</i>	<i>302</i>

Appendix E (continued) – Resident Parking Permit Prices

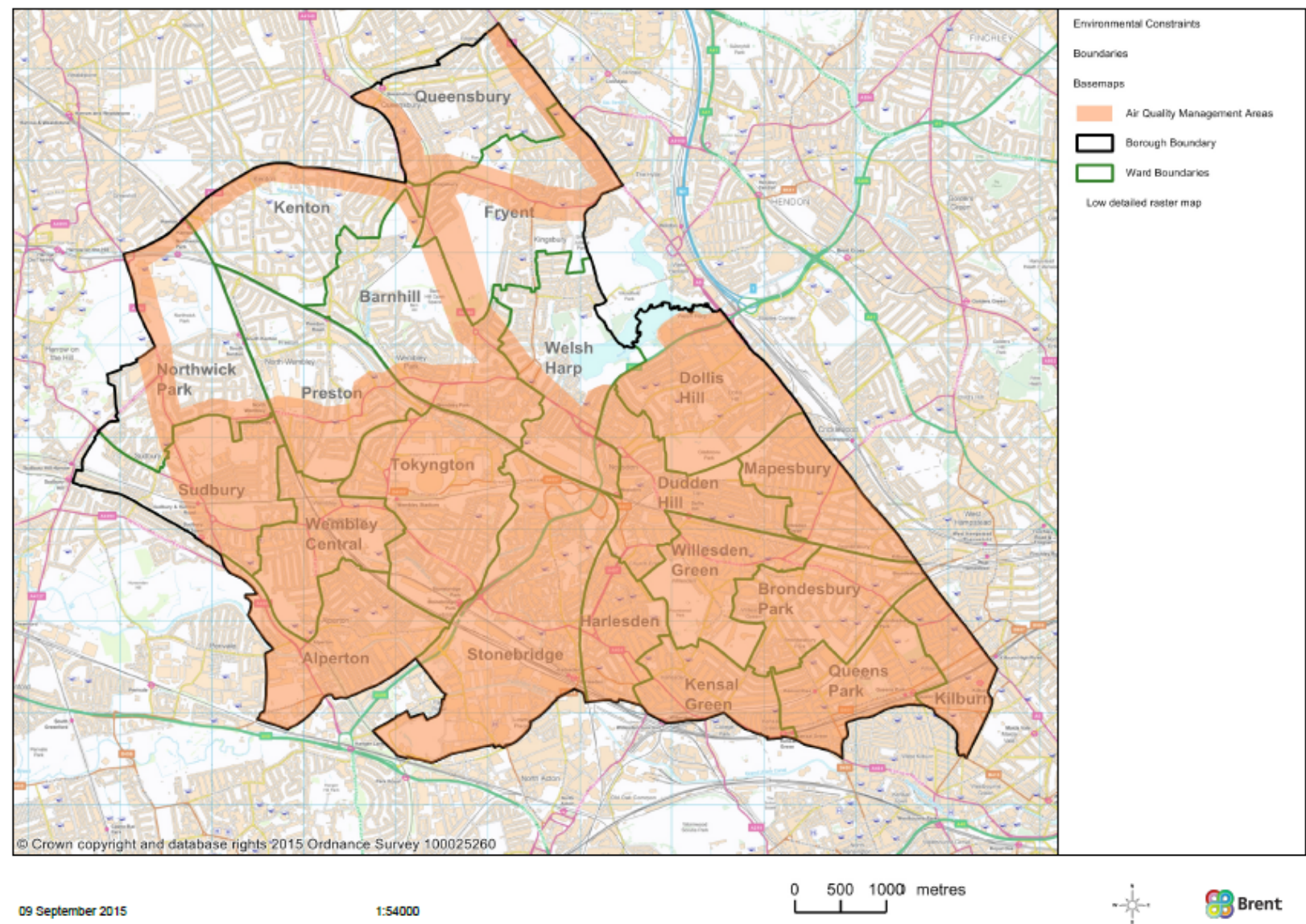
Proposed 2017/18 (prior to application of the inflation-linked price increase due in April 2017)

Vehicle emissions:	Low	Standard	High
<i>Vehicle emissions (gCO₂/km) of passenger vehicles registered on or after 1 March 2001</i>	<i>Less than 110</i>	<i>110-200</i>	<i>201+</i>
<i>Cylinder capacity of engine (cc) of passenger vehicles registered before 1 March 2001 and goods carrying vehicles</i>	<i>Up to 1100</i>	<i>1101-2400</i>	<i>Over 2400</i>
<i>1st permit (£)</i>	<i>25* (min. charge)</i>	<i>83</i>	<i>222</i>
<i>2nd permit (£)</i>	<i>40*</i>	<i>123</i>	<i>262</i>
<i>3rd permit (£)</i>	<i>80</i>	<i>163**</i>	<i>302</i>

*The minimum charge of £25 would also apply to 3 month and 6 month permits for Low Emission Band vehicles.

** £163 is also proposed as the charge for one year Visitor Household permits.

Appendix F – Air Quality Management Areas within Brent



Appendix G - School Travel Plan Objectives

For the pupils:

- Improving health and fitness by walking, scooting and cycling
- Improving travel awareness and road user skills
- Improving awareness of their surroundings

For the school:

- Improving safety around the school
- Reducing congestion around the school
- Establishing safer walking and cycling routes around the school
- Contributing to other school policies such as Eco Schools and Healthy Schools etc.
- Can be linked to the National Curriculum

For parents:

- Reducing stress and time spent driving to school, especially when it is congested
- Increasing quality parent/child contact time

For the local community:

- Improving the local environment by reducing air and noise pollution
- Reducing congestion/obstruction problems
- Improving walking routes
- Improving road safety

Appendix H - Parking Consultation Activities

Date	Method	Activity
08.04.16	Email	Advance notification circulated to all Members via the Members Bulletin
12.04.16	Postal	25,698 Letters posted to active Parking Account Holders
13.04.16	Postal	63 Letters posted to registered Resident Associations located in CPZs
13.04.16	Online	Consultation portal successfully went live online at 12 midday.
13.04.16	Email	24,345 Emails sent to active Parking Account holders
13.04.16	Email	47 emails sent to schools located within CPZs
13.04.16	Online	Details of consultation live online Brent website home page and link to consultation also available through Parking home page and Intranet
13.04.16	Online	Press Release posted live on Brent website. Website home page includes rolling banner headline feature online
13.04.16	Meeting	Brent Connects Kilburn. Promoting participation in the survey, answering questions and distributing paper based questionnaires.
13.04.16	Online	Rotator banner placed on website bring the consultation information to the forefront of the Brent web page.
14.04.16	Online	Brent Internal Communication via Yammer
14.04.16	Paper	Paper based copies of questionnaire and covering note with Customer Services at Brent Civic Centre.
14.04.16	Online	Brent Twitter updated with information regarding the consultation
18.04.16	Meeting	Brent Connects Wembley. Promoting participation in the survey, answering questions and distributing paper based questionnaires
19.04.16	Meeting	Brent Connects Harlesden. Promoting participation in the survey, answering questions and distributing paper based questionnaires
20.04.16	Meeting	Brent Connects Willesden. Promoting participation in the survey, answering questions and distributing paper based questionnaires
20.04.16	Online	Website updated to inform public of Drop-In session at the Yellow Pavilion, Wembley on Saturday 30 th April 2016.
22.04.16	Email	Your Brent weekly newsletter circulated to 33,000 residents with information and feature on consultation, direct link to questionnaire and advising of Public Meeting event date at the Yellow Pavilion.
25.04.16	Focus Group	The first of 3 focus group sessions at Patindar House, Wembley. Presented summary of proposals and Q&A session.
28.04.16	Focus Group	The second of 3 focus group sessions at St Gabriel's Hall, Cricklewood. Presented summary of proposals and Q&A session.
29.04.16	Online	Continuous updates and <i>chatter</i> on twitter monitored and updated.
29.04.16	Email	Second circulation of Your Brent weekly newsletter with information and feature on consultation, direct link to questionnaire and advising of Public Meeting event date at the Yellow Pavilion.
30.04.16	Public Meeting	Public drop-in session at Yellow Pavilion, Wembley on Saturday 30 th April from 10am-2pm. Paper based questionnaires available to take and large map of Brent with CPZ areas placed on wall for visual impact. Flip chart and sticky notes available for residents to leave comments.
03.05.16	Focus Group	The final focus group sessions at Bridge Park Community and Leisure Centre, Brentfield. Presented summary of proposals and Q&A session.
		Almost 100 paper based questionnaires, covering note and pre-paid return envelopes posted to residents on request. All returned questionnaires were uploaded to the consultation portal and given a reference number to distinguish. Various direct emails received and responded to and as number of telephone calls answered providing clarification on the proposals.
10.05.16		CONSULTATION ENDED @ 6PM Returned paper based questionnaires added to the main consultation portal until 15 th May.

Appendix I – Consultation Responses

	Q1 Pay & Display Freeze	Q2 New Visitor Charge Scheme	Q3 Visitor Permit £350 Cap	Q4 End Visitor H- hold. Permit	Q5 Care Permit	Q6 School Business Permits	Q7 School Travel Plan Permits	Q8 Reduce 3 to 2 Resident Permits	Q9 Simplify 7 bands to 3	Q10 Diesel Extra	Q11 Min. £25 charge	Q12 Size Limit of 3.5t	Q13 Local Trader Permit
Strongly Agree	2049	362	641	440	712	706	715	1129	503	721	773	1451	930
Agree	700	487	652	471	762	1001	1040	738	949	579	756	873	1216
Neither Agree / Disagree	264	193	353	354	607	813	872	193	800	415	386	405	688
Disagree	104	388	361	359	276	213	182	250	348	360	328	179	160
Strongly Disagree	156	1851	1263	1655	897	518	434	969	649	1193	1011	361	280
No Response	46	38	49	40	65	68	76	40	70	51	65	50	65

Appendix J – Focus Groups report

This is attached separately.

Appendix K – Willesden Temple responses

Proposal	Agree/ Strongly Agree	Neither Agree or Disagree	Disagree/ Strongly Disagree
Freeze Pay and Display charges	99%	0%	<1%
Introduce new daily visitor charges	2%	<1%	98%
Annual cap on visitor permits	1%	<1%	98%
Withdraw Visitor Household permit	1%	1%	98%
School Business permits	98%	<1%	2%
School Travel Plan permits	98%	<1%	1%
Reduce resident permits from 3 to 2	2%	<1%	98%
Simplify emission based charge bands from 7 to 3	<1%	42%	57%
Introduce diesel surcharge	<1%	2%	98%
£25 minimum resident permit charge	1%	<1%	98%
Reduce maximum vehicle size	1%	51%	48%
Introduce new trader permit	99%	0%	<1%

Appendix L - Assumptions made in financial modelling of changes to visitor permit charges

Assumptions made in financial modelling
Demand forecasts based on volume of visitor parking booking transactions completed in 2015: 451,119 visitor parking bookings
In CPZs that operate for more than 5 hours, demand is assumed to be split between the All day, 4 hour and 2 hour permits in the ratio 40:30:30
In CPZs that operate for 5 hours or less, demand is assumed to be evenly split between the 4 hour and 2 hour permits i.e. one half each.
Demand forecasts assume a reduction on the baseline 2014/15 as follows: demand drops by 7.5% for all day bookings; 5% for 4 hour bookings; and 0% for 2 hour bookings

Appendix M - Resident Permit Restrictions

Stage 1 Equalities Analysis

1. What are the objectives and expected outcomes of your proposal? Why is it needed?

The proposal is to restrict the purchase of resident parking permits to a maximum of 2 per household, instead of the current offer of 3 permits. The aim is to better control demand for kerbside parking space within CPZs, and to encourage take up of more sustainable modes of transport to improve air quality and reduce carbon emissions.

The activities which informed the permit restriction proposal were:

- Public consultation on the proposal to reduce entitlement from 3 to 2 resident permits per household
- Analysis of resident permit data from parking account records
- Policy objectives of the Parking Strategy and Long Term Transport strategy

2. Who is affected by the proposal?

Households in Brent who live in a CPZ and own three vehicles which park on-street.

Controlled Parking Zones cover 49% of Brent's residential addresses. An analysis of data from parking account holders indicates that about 600 households purchase a third resident parking permit each year.

3.1 Could the proposal impact on people in different ways because of their equality characteristics?

There is a possibility that the proposal may affect residents from particular ethnic backgrounds or faith groups.

3.2 Could the proposal have a disproportionate impact on some equality groups?

There could be a risk of disproportionate impact if members of these groups are more likely to live in larger households i.e. where an extended family lives in the same household, including adult children living with their parents.

3.3 Would the proposal change or remove services used by vulnerable groups of people?

The proposal to restrict the number of resident parking permits does not change or remove the service entirely – 2 resident parking permits per household would still be available.

3.4 Does the proposal relate to an area with known inequalities?

Approximately half of the borough is affected, mainly CPZ areas in the south-east of Brent and around Wembley.

3.5 Is the proposal likely to be sensitive or important for some people because of their equality characteristics?

See above.

3.6 Does the proposal relate to one of Brent's equality objectives?

The proposal does not explicitly relate to any of the Equality objectives in the Council's Equality Strategy.

Recommend this EA for Full Analysis?

Yes – further research is required to ascertain whether there would be a significant impact.

An analysis of consultation responses on this specific issue should be conducted, cross-referenced with the ethnicity and faith data provided by respondents.