

London Councils' Transport and Environment Committee

Additional Parking Charges for the London Borough of Ealing and the London Borough of Hounslow

Item No: XX

Report by: [REDACTED] **Job title:** Transport Officer
Date: 10 March 2020
Contact Officer: [REDACTED]
Telephone: [REDACTED] **Email:** [REDACTED]@londoncouncils.gov.uk

Summary: This report details the proposal by the London Borough of Ealing (LB Ealing) and the London Borough of Hounslow (LB Hounslow) to amend the penalty charge banding from Band B to Band A across both boroughs.

Recommendations: The Committee is asked to:

- Approve the proposal to change the penalty banding in the LB Ealing and LB Hounslow

Introduction:

1. Under the provisions set out in the Traffic Management Act 2004 (Schedule 9), which repealed similar provisions in the Road Traffic Act 1991, London Councils' Transport and Environment Committee is responsible, subject to agreement by the Mayor of London and possible veto of the Secretary of State, for setting additional parking charges on borough roads. These additional parking charges include:
 - penalties for contraventions of parking regulations including any surcharges or discounts;
 - release from wheel clamps;
 - removals from the street;
 - storage charges and disposal fees
2. The discount payment rate for early payment has been set at 50%. The amount of any surcharge has not changed since this was set at 50% by Schedule 6(6)(1) of the Road Traffic Act 1991.

- The Committee has reviewed the level of additional parking charges regularly since 1992, when they were first set. The Committee undertook a major review of the charges during 2006 which led to the introduction of differential penalty levels, and again in 2010 where there was an increase in the penalty levels for the more serious contraventions. The current on- and off- street parking penalty charges are as follows:

	Higher Level	Lower Level
Band A	£130	£80
Band B	£110	£60

- The current London banding map can be seen in *Appendix 1*. Band A areas have traditionally been focussed in Central London and urban centres where the pressures on parking and congestion are often greatest. Band B areas have historically concentrated in outer London where pressures on parking are not as significant. However, due to issues with non-compliance, some outer London authorities with higher density parking and significant controlled parking zones have become Band A areas. Higher level penalties apply to contraventions which are considered more serious, such as parking on yellow lines or where an obstruction is caused. Lower level penalties apply generally where parking is permitted but the regulations are contravened, such as overstaying on a pay and display bay.
- London Councils has no current plans for a London-wide review of the additional parking charges and are not aware of any Government plans for a review of the penalty levels for the rest of the United Kingdom.

Guidance on Additional Parking Charges:

- Under the Traffic Management Act 2004 the Secretary of State produced guidance, to which all authorities must have regard. This document is called the Secretary of State's Statutory Guidance to Local Authorities on the Civil Enforcement of Parking Contraventions ("the Statutory Guidance") and states that; "The primary purpose of penalty charges is to encourage compliance with parking restrictions. In pursuit of this, enforcement authorities should adopt the lowest charge level consistent with a high level of public acceptability and compliance." (Para. 4.1).
- It is also the Committee's policy that additional parking charges should be set in such a way as to produce a coherent pattern of policy across London.

LB Ealing Proposals for Change:

- LB Ealing is proposing to change from being Band B to being Band A across the whole borough (please see *Appendix 2* of this report).
- The borough comprises of Band B charging levels, of which approximately 33% is covered by Controlled Parking Zones (CPZs) with further loading and waiting restrictions strategically placed at various locations.
- Figure 3 contained within LB Ealing's application (please see *Appendix 2* of this report) indicates that between 2016/17 and 2018/19 the total number of on-street parking Penalty

Charge Notices (PCNs) issued each year has increased from 70,608 to 100,134 which equates to a 41.8% increase.

11. LB Ealing has stated that it is investing millions in regeneration projects to build on the strengths of the borough's existing economy to help development, employment and business opportunities. This has meant a substantial increase in parking demands both on and off street due to an increase in population, development and economic vibrancy over the years and this has had a negative impact on compliance with its parking regulations despite the fact that very few parking places have been lost as a result.
12. LB Ealing carried out a public consultation as part of this proposal and the results can be found in Appendix 2 of LB Ealing's application (please see *Appendix 2* of this report).
13. It is TEC's policy that the boundaries between areas of different penalty bands are clearly demarcated; this is to avoid the possibility of having different bands on opposing sides of the same road or in the same street. Those roads that have signs clearly identifying that the driver has entered LB Ealing, where the boundary crosses the road, are not affected and can be enforced as Band A. Those without borough identifiers will need to remain Band B.
14. LB Ealing has boundaries with LB Brent, LB Hammersmith & Fulham, LB Harrow, LB Hillingdon and LB Hounslow. There are a number of boundary locations in all named boroughs above where LB Ealing will need to continue enforcing Band B excluding LB Hammersmith & Fulham. LB Hammersmith & Fulham is already Band A, so any shared boundaries with LB Ealing will not impact the ability for LB Ealing to enforce Band A.
15. Any boundary roads in LB Hammersmith & Fulham that are currently being enforced as a Band B due to a boundary with LB Ealing will be enforceable as a Band A once final approval has been received and the new banding regime commences.
16. LB Ealing have provided a list of boundary roads to London Councils officers, who will assess what the banding should be at each location and respond accordingly.
17. Boundary roads with LB Hounslow will also be assessed however, if both authorities receive TEC approval and the applications proceed within the same timeframe, this will not be an issue as the banding between the two boroughs will be the same.

LB Hounslow Proposals for Change:

18. LB Hounslow is proposing to change from being Band B to being Band A across the whole borough (please see *Appendix 3* of this report).
19. The borough comprises of Band B charging levels, of which approximately 33% is covered by Controlled Parking Zones (CPZs), with additional waiting and loading restrictions on primary and secondary roads and smaller 'Stop and Shop' schemes.
20. Table 2 contained within LB Hounslow's application (please see *Appendix 3* of this report) indicates that between 2016/17 and 2018/19 the total number of on-street parking Penalty Charge Notices (PCNs) issued each year has increased from 81,281 to 100,916 which equates to a 24% increase compared to a 7% increase for the rest of London.
21. Table 3 contained in LB Hounslow's application (please see *Appendix 3* of this report) identifies four contravention groups that are of particular concern within the borough due to the disproportionate impact they have on commerce, public transport and the vulnerable.

22. LB Hounslow has already experienced significant residential and commercial development and a reduction in parking places, and it will see further growth in population as these projects continue to take place, with no planned increase in parking provisions. This has meant a substantial increase in parking demands both on and off street and has had a negative impact on compliance with its parking regulations.
23. LB Hounslow carried out a public consultation as part of this proposal and the results can be found in Appendix 2 of LB Ealing's application (please see *Appendix 3* of this report)
24. As previously stated, it is TEC's policy that the boundaries between areas of different penalty bands are clearly demarcated; this is to avoid the possibility of having different bands on opposing sides of the same road or in the same street. Those roads that have signs clearly identifying that the driver has entered LB Hounslow, where the boundary crosses the road, are not affected and can be enforced as Band A. Those without borough identifiers will need to remain Band B.
25. LB Hounslow has boundaries with LB Ealing, LB Hammersmith & Fulham, LB Hillingdon and LB Richmond. There are a number of boundary locations in all named boroughs above where LB Hounslow will need to continue enforcing Band B excluding LB Hammersmith & Fulham. LB Hammersmith & Fulham is already Band A, so any shared boundaries with LB Hounslow will not impact the ability for LB Hounslow to enforce Band A.
26. Any boundary roads in LB Hammersmith & Fulham that are currently being enforced as a Band B due to a boundary with LB Hounslow will be enforceable as a Band A once final approval has been received and the new banding regime commences.
27. LB Hounslow have provided a list of boundary roads to London Councils officers, who will assess what the banding should be at each location and respond accordingly.
28. Boundary roads with LB Ealing will also be assessed however, if both authorities receive TEC approval and the applications proceed within the same timeframe, this will not be an issue as the banding between the two boroughs will be the same.

Timetable for Implementation:

29. Any changes to penalty levels agreed by the Committee need the approval of the Mayor. If the Mayor agrees the changes, the Secretary of State has 28 days to exercise a veto over any changes. The committees' decisions will be formulated into a set of proposals to be presented to the Mayor of London for approval. If approved, they will be presented to the Secretary of State for Transport for their consideration. The boroughs involved would then need to advertise their proposed changes for at least three weeks prior to implementation.

Financial Implications:

30. There are no financial implications for London Councils arising from this report.

Legal Implications:

31. There are no legal implications for London Councils or the boroughs arising from this report. However, members may wish to note the decision on penalties is taken by London Councils' TEC on behalf of boroughs for borough roads, and by TfL for GLA roads.

The TfL member of London Councils' TEC may not take part in the proceedings of the borough decision (see Reg. 24 of the Civil Enforcement Parking Contravention Regulations 2007).

Equalities Implications:

32. There are no equality implications for the boroughs or London Councils arising from this report.

Recommendations: The Committee is asked to:

- Approve the proposal to change the penalty banding in the LB Ealing and LB Hounslow

Appendices:

Appendix 1: Existing on and off-street penalty charge bands

Appendix 2: LB Ealing application to change the banding level from Band B to Band A.

Appendix 3: LB Hounslow application to change the banding level from Band B to Band A.

Appendix 2 – Existing Bandings in London

Existing on-street penalty charge bands



Existing off-street penalty charge bands





**Transport and Environment
Committee**

**London Councils
59½ Southwark Street
London
SE1 0AL**

Victoria Lawson – Executive Director
Environment, Culture & Customer Services

Hounslow House

7 Bath Road

Hounslow TW3 3EB

Your contact: Mark Frost

Direct Line: [REDACTED]

Fax:

E-Mail: [REDACTED] [@hounslow.gov.uk](mailto:[REDACTED]@hounslow.gov.uk)

Our ref: TEC/BandA

Date: 06 March 2020

To the Members of the Transport and Environment Committee

RE: Application to amend the Penalty Charge Notice Banding in Hounslow

The London Borough of Hounslow is seeking an agreement from the Transport and Environment Committee to amend the borough's Penalty Charge Notice (PCN) banding from the current Band B to Band A. This letter is a formal application for Transport and Environment Committee to consider this proposal.

Fig 1 – Map of current Band A / Band B London Boroughs



Current Banding

The London Borough of Hounslow is a Band B borough for parking offences meaning that the lower set of charges apply, as shown in Table 1, below.

In all instances, a 14-day 50 % discount rule applies, and the discounted amounts are shown in brackets in the table below.

Table 1

Band	Higher (Discount)	Lower (Discount)
A	£ 130 (£ 65)	£ 80 (£ 40)
B	£ 110 (£ 55)	£ 60 (£ 30)

There is a limited exception in the Twickenham Stadium Event Zone (Zone R) which when in operation operates at Band A level. The event zone operates when crowds of more than 30,000 are expected at Twickenham Stadium, which is typically ten to twelve times per year. The stadium itself is located in the borough of Richmond close to the Hounslow / Richmond boundary. The Twickenham Events Zone operates as a single controlled area across both boroughs (in the area around the stadium).

Background:

Hounslow has experienced a substantial increase in the instances of parking specific non-compliance detected and PCNs issued over the past three years. This increase is driven by increasing pressure on limited parking availability which in turn is driving higher levels of non-compliance. The net gain in PCNs issued from 2016/17 to 2018/19 is 24%.

This increase is against a background increase across London of 7% for the same period. These figures are illustrated further in Table 2 below and a full breakdown of all parking PCNs issued across London for the same period is included as Appendix 1.

Table 2

	2018/19	2016/17	Variance	Percentage Variance
Hounslow	100,916	81,281	19,635	24%
Rest of London	3,703,427	3,458,151	245,276	7%

During this period formal appeals to the adjudication service remained relatively stable improving from 0.6% of PCNs issued in 2016/17 being appealed to 0.5% of PCNs issued in 2018/19 being appealed.

In the most recent set of statistics issued by London Councils, Hounslow was scored as a Category 4 borough (Low Appeal Rate / Low Allow Rate).

Figure 2 provides details of the scoring mechanism.

Figure 2

		Appeal rate	
		High	Low
Allowed rate	High	1	3
	Low	2	4

Within the overall increase in PCN issued , there are some notable increases in individual contraventions, as shown in Table 3 below:

Table 3

	18/19	16/17	Percentage Change
Disabled Bays	1,181	404	192%
Bus Stops	361	255	42%
Loading Bays	3,359	546	515%
Footway	11,541	5,737	101%

These contravention groups (Table 3) are of particular concern because of the disproportionate impact they have on commerce, public transport and the disabled community, as well as the obstruction of footways which can impede passage by mobility-impaired users and parents/carers with pushchairs.

The Council believes that an increase in the penalty amount is likely to help restore the deterrent effect of the Penalty Charge Notice. This will, in turn, result in higher levels of compliance and an overall reduction in the number of Penalty Charge Notices issued.

In practice, this means moving from the current Band B to the higher value Band A.

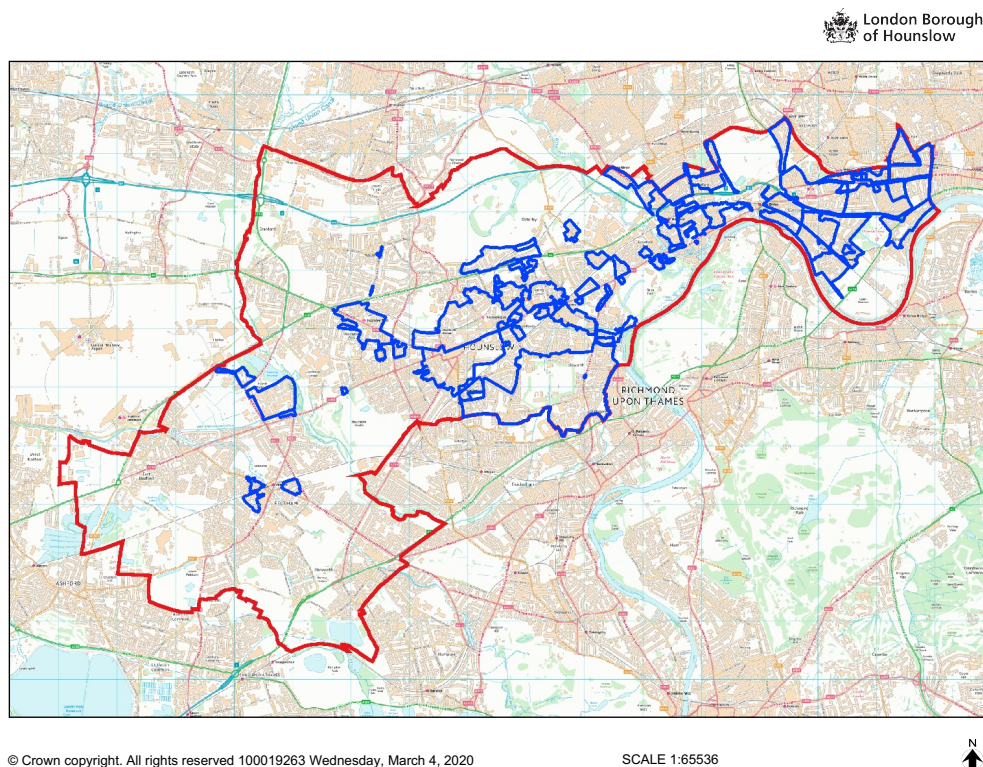
Provision of Parking within Hounslow

Approximately one-third of the borough is covered by Controlled Parking Zones (CPZs).

The majority of zones are located either centrally around Hounslow Town Centre or towards the east of the borough around Chiswick Town Centre. These CPZs for the greater part are well established being in existence for at least ten years, and in some instances, twenty years. Recent schemes have tended to be much smaller and often operating for minimal hours in response to localised issues, such as school drop off in some cases for twenty years or more

Additional Waiting & Loading restrictions on primary and secondary roads and smaller Stop & Shop schemes outside of the CPZ network. Figure 3 gives an overview of the CPZ network.

Fig 3



Note - Additional primary routes dissect the borough that are under the control of Transport for London (such as the A4 and A316). These routes are out of the scope of this application as the application relates to the London Borough of Hounslow issued PCNs only.

Impact of Redevelopment

LB Hounslow has recently experienced significant residential and commercial development.

To date, this has been concentrated in Brentford and Hounslow Town Centres, part of the Great West Corridor and Heathrow opportunity areas respectively. In Brentford over 1000 new residential units have been delivered in the last five years, and these have all had restrictions placed on car parking levels in line with the London Plan.

In Hounslow Town Centre, over 1000 off-street parking spaces have been removed to make way for a new council office (the existing Civic Centre site now in the process of being converted to c1000 new homes), expanded schools, and town centre redevelopment including a new cinema, café's, bars and housing.

New development of this nature which brings more trips to an area with no increase in parking provision may have served to place more pressure on existing stock and hence lead to further issues with compliance.

Looking to the future, the latest iteration of the Council's local plan sets out proposals for further development across the borough and particularly in these opportunity areas.

- At least 7,500 new homes and 17,600 new jobs in Great West Corridor (Brentford)
- At least 10,300 new homes and 13,000 new jobs in West of Borough including in the vicinity of Heathrow.
- Additional incremental development across the rest of the borough

This additional development, the majority of which will also come forward with low or limited parking in line with the London Plan, could be expected to exacerbate compliance levels further. This regeneration is part of a broader strategy that is designed to improve the borough by growing business, improving connectivity, place-making and enhancing the environment as summarised in Figure 4.

Fig 4

Strategy	Growing business	Improving connectivity	Place-making	Enhancing the environment
Joint Prevention Strategy for Adult Services in Hounslow 2014 - 18			✓	✓
Joint Children and Young People's Strategy 2015 - 2019	✓		✓	
Leisure and Culture Strategy 2016 - 2020	✓	✓	✓	✓
Thriving Communities and Voluntary, Community and Social Enterprise (VCSE) Sector Strategy 2015 - 2019	✓		✓	✓
Community Safety Strategy 2014 - 2017	✓	✓	✓	✓
Housing Strategy 2014 - 2018			✓	✓
Climate Change Strategy (to be completed)				✓
Hounslow Skills and Employment Strategy 2014 - 2016	✓		✓	
Heritage Strategy (to be completed)			✓	
Corporate Property Strategy 2014 - 2019	✓		✓	
Hounslow Local Implementation Plan for Transport (2011-2031)	✓	✓	✓	✓

Full details of Hounslows regeneration plans can be found at:

<https://www.hounslow.gov.uk/info/20061/regeneration>

Consultation

A consultation on these proposals was held in December 2019 / January 2020. The consultation was advertised on the Council's website and also promoted in HM magazine which is delivered to all households within the borough and on social media by the councils Communications Team.

There were 89 respondents to the consultation, a relatively low response rate for a borough-wide consultation although not totally unexpected as Hounslow has often had a low response rate to parking consultations.

Appendix 2 shows additional consultation details.

Overall the feedback received indicated that there was a lack of majority support for the proposals. Table 4 below provides summary results.

Table 4

Option	Result
Yes	20 (22%)
No	62 (70%)
Not sure	7 (8%)

Example comments of respondents in support of increasing the charge included:

- Parking is at a premium, and there are constant examples of people parking selfishly and unlawfully across the whole borough. An increase in the amount of the fine I think is a good thing as it isn't much of a deterrent when it is so little. Lots of people will risk non-compliance, and they may think twice if the fine is higher. I am fed up of everyone thinking that they deserve special treatment and that they can park wherever they like including disabled bays. Too many drivers are parking illegally and ignoring existing rules of the roads so a higher deterrent must be used. Badly parked vehicles cause danger to pedestrians, cyclists and others.*

Example comments from respondents against the charge:

- *Instead of increasing the charge, the Council should educate drivers about parking restrictions. This would be much more effective way of tackling the issue.*
- *I pay enough taxes and don't support your agenda of taxing drivers in other ways.*

The Council also received a letter in support of the proposals from the Hounslow Cycling campaign. It has also been noted that a wide range of organisations have been campaigning for action against anti-social parking practices in recent years. This includes charities that represent those population groups with protected characteristics, including those with visibility impairments, learning disabilities and older people more generally.

As with other authorities, Hounslow often receives a low level of support for parking-related controls and charges, with many comments highlighting concerns that the proposals are motivated by a desire to raise revenue rather than manage parking and traffic flow.

Notwithstanding the results of the consultation, officers remain of the view that the proposal to change the bands to Band A, will assist in the better management of the kerb space within the borough, help ensure that the highway network can operate effectively and also support independent travel by members of the public – particularly those with mobility impairments.

This has also been endorsed by the lead member via a single member decision approved on 20/02/2020. This can be found at <https://democraticservices.hounslow.gov.uk/ieListDocuments.aspx?CId=578&MIId=11562>

Equalities

The Council has had due regard to its Equalities Duties and in particular concerning its duties arising in the Equalities Act 2010.

A relevance test has been carried out by officers, and it is considered that there will be no disproportionate impacts on those population groups with protected characteristics arising as a result of these proposals.

It is further noted that the changes detailed in this report are aimed at ensuring the highest level of compliance is maintained across the Council's parking network. Compliance with parking restrictions is a critical part of ensuring that the borough's transport network works effectively, that public transport services can maintain

schedules and service levels, and that vulnerable groups such as those with mobility impairments are not unduly hindered in their daily activities.

While some concerns were expressed by those with disabilities about the proposals in the consultation, these concerns often centred around the circumstances of individual PCN incidents and ignored the broader benefits to those with mobility impairments arising from a greater deterrent against footway parking and disabled bay abuse etc. These benefits have been raised by umbrella groups representing those with disabilities in campaigns about anti-social parking – notably around footway parking etc.

As such, the Council believes that there is no need for a full Equalities Impact Assessment to be carried out and that in approving this report, the Council will be acting in compliance with its duties.

Boundaries

Hounslow has boundaries with four other London Boroughs:

- Ealing Band B (considering a Band A application)
- Hammersmith & Fulham Band A
- Hillingdon Band B
- Richmond upon Thames Band B

Hammersmith & Fulham is already a Band A borough, and as such, this change presents a simplification of boundary issues. Ealing is also progressing a Band A an application and should that application be successful; this would simplify the boundary issues with Ealing, which is our most complex boundary.

The remaining boundaries have been surveyed and assessed against the historical treatment applied to differing band boundaries. The border with Hillingdon comprises mainly of open space and with Richmond primary routes that already contain boundary signs.

Hounslow officers see no difficulty in complying with that historical treatment and upon approval of this application by the Transport and Environment Committee, they would work quickly with London Councils officers to agree on a detailed treatment schedule for submission to the Mayor's office.

A schedule of boundary roads is attached as appendix 3

Conclusion:

In locations with greater demand and higher levels of parking pressure, an increased level of penalty can act as a deterrent to stem the ever-increasing number of parking contraventions in the borough - the reasoning behind the two banding levels in London in the first instance.

With Hounslow experiencing significant parking pressure across the borough, that in turn is resulting in increasing levels of non-compliance, the issue of PCN banding needs addressing.

A move from Band B to Band A will increase the deterrent effect of the PCN and in turn increase compliance with the restrictions, an outcome that is core to the reasons for restrictions in the first place.

Request:

It is requested that the London Council's Transport and Environment Committee agree in permitting a change to the London Borough of Hounslow's PCN band from Band B to Band A, to achieve the outlined compliance goals above.

With Transport and Environment Committee's approval, London Councils and Hounslow officers will agree on timescales for advancing this request to the Greater London Authority and onwards, to the Secretary of State.

Yours sincerely



Mark Frost
Assistant Director
Transport, Parking & Environmental Strategy
London Borough of Hounslow

Appendix 1 – All London Parking PCNs for three year period 2016/17 – 2018/19

	2018/19	2016/17	Variance	Percentage Variance
Hounslow	100,916	81,281	19,635	24.16%
Rest of London	2018/19	2016/17	Variance	Percentage Variance
Barking & Dagenham	54,042	47,908	6,134	12.80%
Barnet	129,667	148,843	-19,176	-12.88%
Bexley	45,755	51,406	-5,651	-10.99%
Brent	118,352	105,584	12,768	12.09%
Bromley	56,460	71,117	-14,657	-20.61%
Camden	183,924	200,053	-16,129	-8.06%
City of London	53,098	52,919	179	0.34%
Croydon	105,243	90,638	14,605	16.11%
Ealing	100,134	70,608	29,526	41.82%
Enfield	68,195	59,335	8,860	14.93%
Greenwich	42,400	38,885	3,515	9.04%
Hackney	86,784	76,768	10,016	13.05%
Hammersmith & Fulham	148,806	131,881	16,925	12.83%
Haringey	153,320	128,577	24,743	19.24%
Harrow	104,547	98,226	6,321	6.44%
Havering	62,553	57,979	4,574	7.89%
Hillingdon	55,025	67,465	-12,440	-18.44%
Islington	163,004	147,306	15,698	10.66%
Kensington & Chelsea	200,004	204,822	-4,818	-2.35%
Kingston	69,271	62,417	6,854	10.98%
Lambeth	123,544	107,067	16,477	15.39%
Lewisham	54,664	47,313	7,351	15.54%
Merton	68,525	66,489	2,036	3.06%
Newham	145,910	120,252	25,658	21.34%
Redbridge	118,388	92,661	25,727	27.76%
Richmond	67,343	66,718	625	0.94%
Southwark	88,306	77,828	10,478	13.46%
Sutton	29,230	25,866	3,364	13.01%
Tower Hamlets	93,547	98,393	-4,846	-4.93%
Transport for London	425,803	371,969	53,834	14.47%
Waltham Forest	100,273	66,147	34,126	51.59%
Wandsworth	128,330	133,178	-4,848	-3.64%
Westminster	258,980	271,533	-12,553	-4.62%
Total	3,703,427	3,458,151	245,276	7.09%

Parking Ticket Charges - Proposed Increase

Overview

London has two charging levels for Parking Penalty Charge Notices (PCNs), often known as parking tickets. Hounslow is a Band B borough except for the Twickenham Stadium Event scheme, which already operates at the higher Band A level. We now propose applying to become a Band A borough to help improve the level of compliance with parking restrictions.

Within each band, there is a further Higher / Lower charging split according to the severity of offence, as shown in the table below. A 50% discount applies for early (i.e. within 14 days) payments. These amounts are as shown in brackets.

Band	Higher (Discounted)	Lower (Discounted)
A	£130 (£65)	£80 (£40)
B	£110 (£55)	£60 (£30)

In real terms, this means a PCN issued for overstaying in a car park in our borough can be settled at £30, while one issued for parking in a disabled bay can be settled at £55. Our proposal would see a £10 increase in both cases.

Why We Are Consulting

The number of PCNs issued in our borough has grown by 39% since 2015. This includes large increases in categories of particular concern to the council (see table in the "Related" section below), such as footway parking contraventions, which greatly impact those with wheelchairs and pushchairs. While part of this increase may be attributed to new restrictions (e.g. more disabled bays) and improved detection by the enforcement team, that does not account for such significant growth. The decreased deterrent of the charges, which have not been reviewed since 2011, is believed by the council to be a major factor.

The aim of a well-functioning parking operation is high compliance, achieved with clear and appropriate restrictions, supported by robust and fair enforcement. The council believes an increase in the penalty amount will improve PCNs' deterrent effect, resulting in higher compliance and reducing the number of PCNs issued.

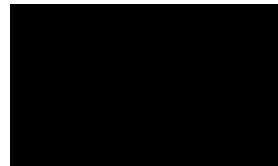
Other boroughs such as Barnet, Brent, and Ealing are also considering re-banding. A map in the "Related" section shows the current council bands.

This consultation is to gather your views to inform any application we make to The Secretary of State to become a Band A borough for parking offences.

Closed 28 Jan 2020

Opened 13 Dec 2019

Contact



Contents

Question 1: What is your name?

Name

Question 2: What is your email address?

Email

Question 3: What is your postcode?

Postcode

Question 4: Please select the statement(s) which apply to you regarding your relationship to the borough.

Relationship to borough

Other

Question 5: Do you support the council applying to become a Band A borough, so Penalty Charge Notices (parking tickets) are charged at a higher amount?

Support

Question 6: Please use this space to say why you support / don't support the proposal, and to add any other comments you would like to share.

Comments

Question 7: What is your gender?

What is your gender

Question 8: What is your age?

what is your age

Question 9: What is your ethnicity?

ethnicity

Question 10: Do you consider yourself to have a disability?

Disability

Question 11: If your answer to the previous question was yes, please indicate the type of disability which applies to you. People may experience more than one type of disability, in which case tick all types that apply. If your disability does not fit any of these types, please specify 'other'.

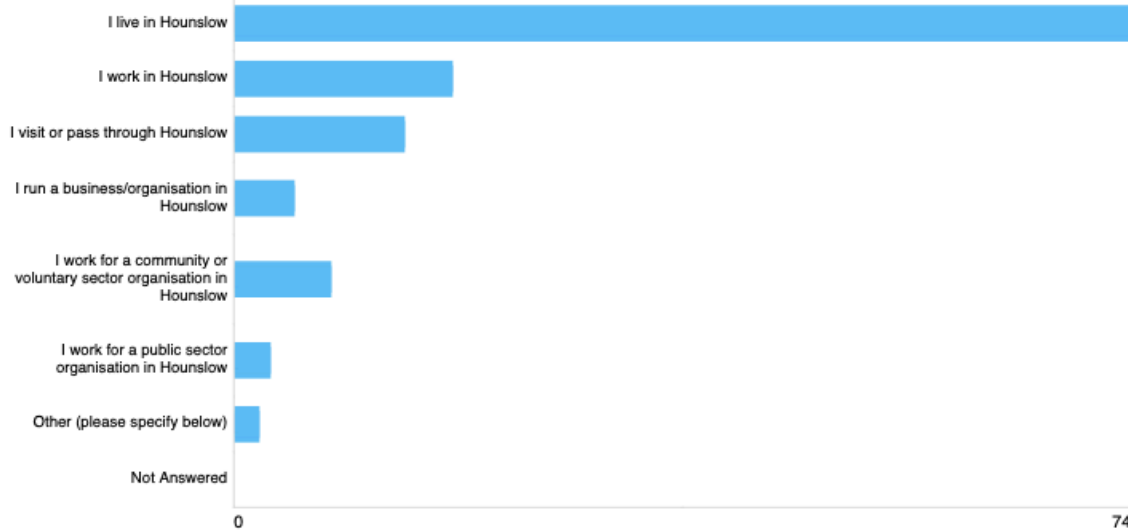
type of disability

Other

Please note – for data protection reasons the responses to Questions 1,2 & 3 are not distributed

Question 4: Please select the statement(s) which apply to you regarding your relationship to the borough.

Relationship to borough



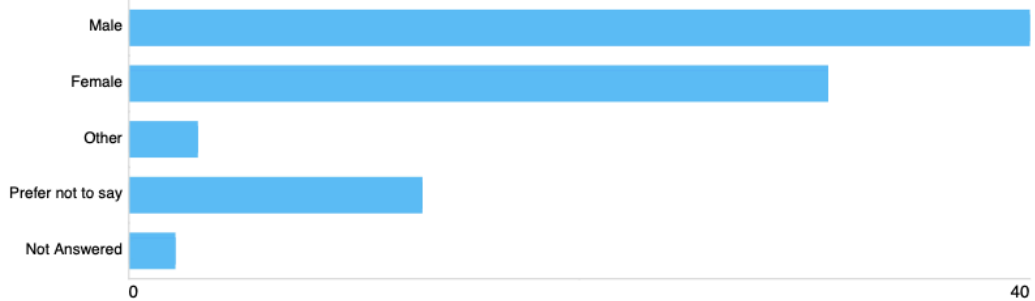
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Support



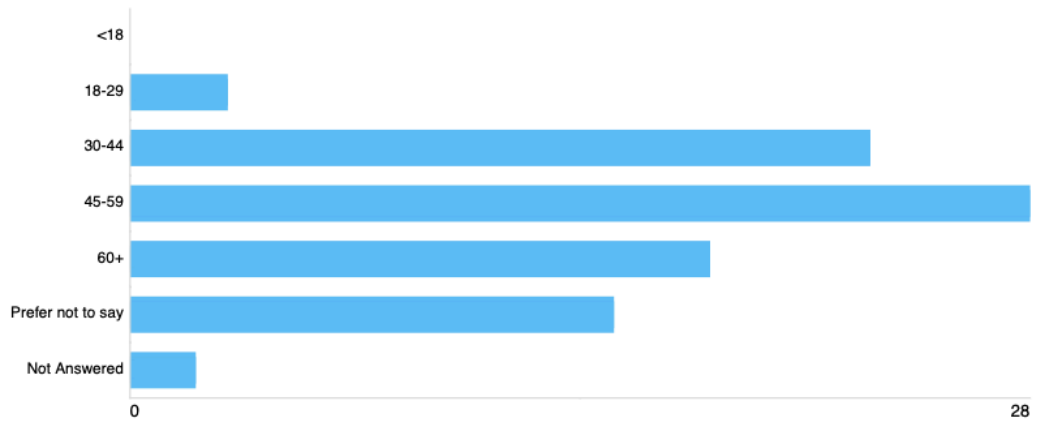
Question 7: What is your gender?

What is your gender



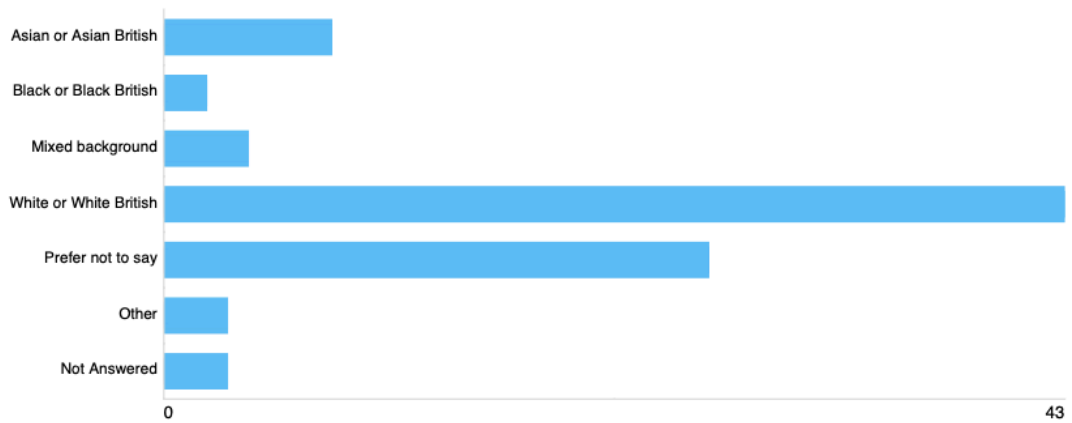
Question 8: What is your age?

what is your age



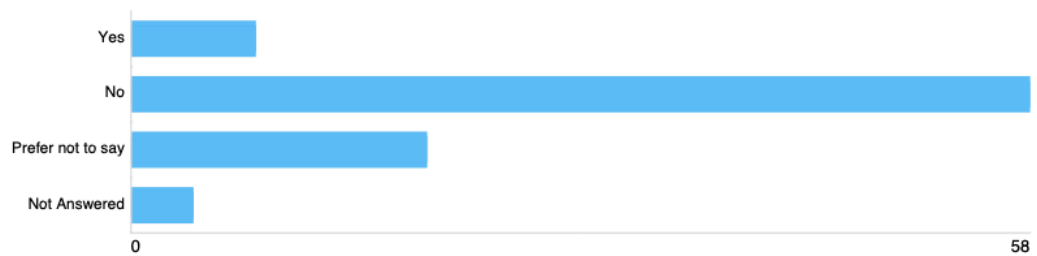
Question 9: What is your ethnicity?

ethnicity



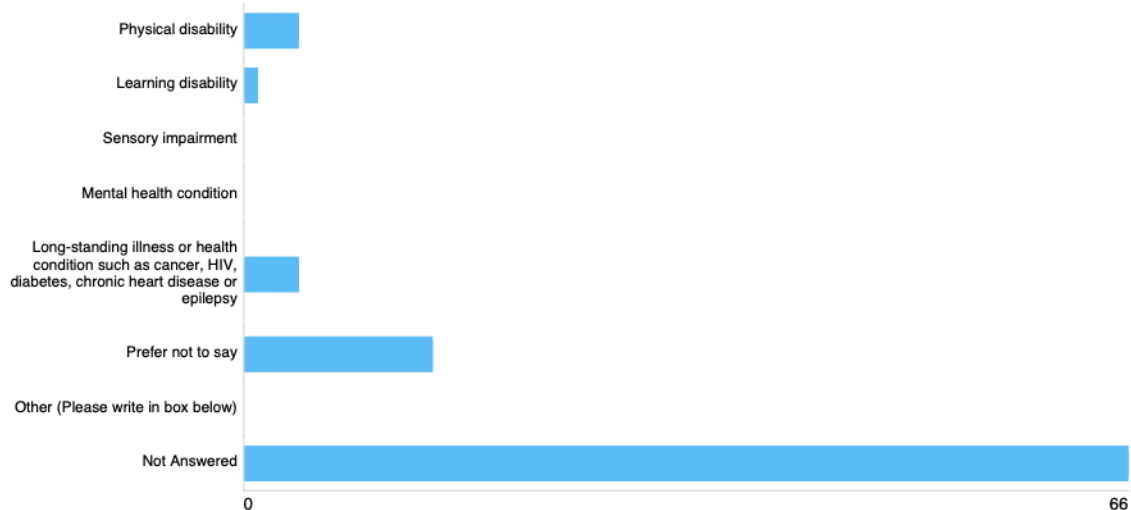
Question 10: Do you consider yourself to have a disability?

Disability



Question 11: If your answer to the previous question was yes, please indicate the type of disability which applies to you. People may experience more than one type of disability, in which case tick all types that apply. If your disability does not fit any of these types, please specify 'other'.

type of disability



Appendix 3 - London Borough of Hounslow Boundary Roads

Count	Street	Nearest post-code	Borough
1	North Hyde Lane	UB2 5FA	London Borough of Ealing
2	Thornccliffe Road	UB2 5RJ	London Borough of Ealing
3	Craneswater Park	UB2 5RR	London Borough of Ealing
4	Green Walk	UB2 5QY	London Borough of Ealing
5	Crosslands Avenue	UB2 5QY	London Borough of Ealing
6	Norwood Road	TW5 0HH	London Borough of Ealing
7	Heston Road	TW5 0HQ	London Borough of Ealing
8	Osterley Lane	UB2 4LB	London Borough of Ealing
9	Windmill Lane	TW7 5PR	London Borough of Ealing
10	Boston Manor Road	TW8 9LQ	London Borough of Ealing
11	Swyncombe Avenue	W5 4DS	London Borough of Ealing
12	The Ride	TW8 9LA	London Borough of Ealing
13	Windmill Road	W5 4BT	London Borough of Ealing
14	Windmill Road	TW8 9NQ	London Borough of Ealing
15	Junction Road	TW8 9NN	London Borough of Ealing
16	Ealing Road	W5 4BB	London Borough of Ealing
17	Darwin Road	W5 4BB	London Borough of Ealing
18	Carlyle Road	W5 4BP	London Borough of Ealing
19	South Ealing Road	W5 4RH	London Borough of Ealing
20	South Ealing Road	W5 4RH	London Borough of Ealing
21	Clayponds Avenue	W5 4RF	London Borough of Ealing
22	Sterling Place	TW8 9QE	London Borough of Ealing
23	Lionel Road North	TW8 9QU	London Borough of Ealing
24	Pope's Lane	W5 4NG	London Borough of Ealing
25	Lionel Road North	W5 4NG	London Borough of Ealing
26	Hayes road	UB2 5NS	London Borough of Ealing
27	Gunnersbury Avenue (North Circular Road)	W3 8LJ	London Borough of Ealing
28	Princes Avenue	W3 8LJ	London Borough of Ealing
29	Gunnersbury Lane	W3 8HP	London Borough of Ealing
30	Acton Lane	W4 5DX	London Borough of Ealing
31	Belmont Terrace	W4 5UN	London Borough of Ealing
32	Fishers Lane	W4 1RZ	London Borough of Ealing
33	The Avenue	W4 1LS	London Borough of Ealing
34	Priory Avenue	W4 1UE	London Borough of Ealing
35	Rupert Road	W4 1UF	London Borough of Ealing
36	Blenheim Road	W4 1UF	London Borough of Ealing
37	Abinger Road	W4 1EG	London Borough of Ealing
38	Bath Road	W4 1LJ	Hammersmith and Fulham
39	Welstead Way	W4 1LH	Hammersmith and Fulham
40	Prebend Gardens	W6 0XT	Hammersmith and Fulham
41	Stamford Brook Avenue	W6 0YD	Hammersmith and Fulham
42	Goldhawk Road	W6 0SB	Hammersmith and Fulham
43	Chiswick High Road	W4 1TH	Hammersmith and Fulham
44	British Road	W4 2NL	Hammersmith and Fulham
45	Berestede Road	W4 2NL	Hammersmith and Fulham
46	Great West Road	W4 2PU	Hammersmith and Fulham
47	Chiswick Mall	W4 2PS	Hammersmith and Fulham
48	Great Chertsey Road	W4 3UL	Richmond-Upon-Thames
49	Kew Road	TW8 0FD	Richmond-Upon-Thames
50	Richmond Road	TW7 7JA	Richmond-Upon-Thames
51	Talbot Road	TW7 7HG	Richmond-Upon-Thames
52	Twickenham Road	TW7 7QR	Richmond-Upon-Thames
53	Varsity Drive	TW1 1AG	Richmond-Upon-Thames
54	Rugby Road/Whitton Dene	TW7 7LW	Richmond-Upon-Thames
55	Whitton Dene	TW7 7NE	Richmond-Upon-Thames
56	Old Manor Drive	TW7 7NE	Richmond-Upon-Thames
57	Whitton Road	TW3 2EN	Richmond-Upon-Thames
58	Wills Crescent	TW3 2LG	Richmond-Upon-Thames
59	Argyle Avenue	TW3 2LL	Richmond-Upon-Thames
60	Hanworth Road	TW4 5LE	Richmond-Upon-Thames
61	Wellington Road South	TW4 5JX	Richmond-Upon-Thames
62	A312	UB2 5NB	Hillingdon
63	North Hyde Road	UB2 5NB	Hillingdon
64	M4	TW5 9RY	Hillingdon
65	Park Lane	TW5 9RW	Hillingdon
66	Great South West Road	TW14 0PH	Hillingdon
67	Girling Way	TW14 0PH	Hillingdon
68	Turpin way	TW14 0PS	Hillingdon
69	Faggs Road	TW14 0PS	Hillingdon
70	Cains Lane (Dead-end road)	TW14 9RH	Spelthorne
71	Beacons road	TW19 7NL	Spelthorne
72	Staines Road	TW14 8RU	Spelthorne
73	Clockhouse Lane	TW14 8QA	Spelthorne
74	Chertsey Road	TW13 4RL	Spelthorne
75	Cadbury Road	TW14 4RL	Spelthorne
76	Groveley Road	TW13 4PJ	Spelthorne
77	A316	TW13 6XH	Spelthorne
78	Green Lane	TW13 6TL	Richmond Upon-Thames
79	Hampton Lane	TW13 6NT	Richmond Upon-Thames
80	Hameton Road East	TW13 6JB	Richmond Upon-Thames
81	Twickenham Road	TW13 6JB	Richmond Upon-Thames
82	Great Chertsey Road	TW13 5QY	Spelthorne
83	Hounslow Road	TW13 6QH	Richmond Upon-Thames
84	A4	TW5 9WA	Spelthorne
85	Godfrey Way	TW4 5SY	Richmond Upon-Thames
86	Sanctuary Road	TW19 7NL	Spelthorne
87	Stanwell Road	TW19 7NL	Spelthorne
88	Feltham Road	TW15 1AT	Spelthorne
89	Bedfront Road	TW19 7LE	Spelthorne
90	Country way	TW13 6XH	Spelthorne

From: Councillor Manuel Abellan [REDACTED]
Sent: 23 March 2020 10:47
To: Alan Edwards [REDACTED]
Cc: [REDACTED] Spencer Palmer
Subject: Re: TEC Urgency Procedures

Hi Alan,

I'm happy to agree these as per the recommendations in the reports.

Regards,

Manuel Abellan
Liberal Democrat Councillor for Beddington South Ward
Chair of the Environment & Neighborhood Committee

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On Fri, Mar 20, 2020 at 12:39 PM Alan Edwards [REDACTED] wrote:

Dear TEC Elected Officers. Please find attached the following items that will need to be agreed under the TEC Urgency Procedure, owing to the cancellation of the TEC meeting on 19 March 2020.

- HGV Safety Permit Scheme: Approval of Arrangements for the Administration & Enforcement by Transport for London Councils
- Freedom Pass Progress Report, and
- Additional Parking Charges: London Boroughs of Ealing and Hounslow (appendices can be found in the papers previously sent to you)

I would be grateful if you could send back your responses, via email, by **Friday 27 March 2020**.

Regards

Alan Edwards

Governance Manager

London Councils

Sadiq Khan
Mayor of London
Greater London Authority
City Hall
The Queen's Walk
London
SE1 2AA

Contact: Spencer Palmer

Direct line: [REDACTED]

Email: [REDACTED]

Date: 29 April 2020

Dear Mr Khan,

Additional parking penalties and related charges for the London Borough of Hounslow

On 27 March 2020, London Councils' Transport and Environment Committee (TEC), under the TEC Urgency Procedure, (owing to the cancellation of the full meeting on 19 March 2020) agreed a proposal for changing the level of Additional Parking Charges applicable on borough roads in the London Borough of Hounslow. The report considered by the Committee is attached for information.

The report sets out Hounslow's proposal to change from penalty charge Band B to Band A across the borough. This change is intended to help improve compliance with essential traffic and parking management measures. I am therefore writing to request your approval of the proposed banding change set out above in accordance with the Traffic Management Act 2004.

Hounslow do not yet have an intended implementation date for the new banding but will not implement the change until the current Covid-19 social distancing measures are lifted and there is a return to normal traffic and parking operations. However, they are hopeful that the revised charges could be introduced later this year and want to progress this matter as far as possible in the meantime. It would be beneficial therefore, if you were able to consider this matter at the earliest opportunity so the legal process can continue.

Should you require any further information, please do not hesitate to contact me.

Yours sincerely,



Spencer Palmer
Director, Transport and Mobility

Cc: Heidi Alexander – Deputy Mayor for Transport

GREATERLONDONAUTHORITY

Spencer Palmer
[REDACTED]

Ref: MGLA300420-0524

Date: 15 June 2020

Dear Spencer,

Thank you for your letter to the Mayor, copied to the Deputy Mayor for Transport, on behalf of the London Borough of Hounslow to amend parking charges in the borough.

I would like to confirm that this request and supporting evidence has been received. Having analysed the information provided and with a view to ensuring consistency in the decisions taken by the Mayor in this regard, I would like to request the following information:

- The information provided in the submission covers the financial year 2018/19. Is any updated information about PCNs issues in 2019/20 (or part year) available and any analysis from the borough of whether trends are continuing?
- The submission does not reference any consultation undertaken with stakeholders, including neighbouring local authorities. Could you please confirm if any were contacted as part of the consultation process?
- Could you provide a copy of the minutes of the London Councils Transport and Environment Committee where the urgent procedure is approved?

Lastly, as you are aware under section 149 of the Equality Act 2010 ('the Equality Act'), as a public authority, the Mayor must have due regard, when making a decision, to the need to eliminate unlawful discrimination, harassment and victimisation, and to advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not. Our analysis suggests there could be further consideration of the impact of the proposal on people with protected characteristics. While the impact on individuals with protected characteristics who don't park unlawfully appears to have been identified, the impact on individuals with protected characteristics who park unlawfully doesn't appear to have been expressly identified. To ensure this duty is met, it would be helpful for the authority to consider any possible detrimental impact on people with protected characteristics, ensure this has been fully considered in the decision making and that this is fully represented in the information provided to the Mayor. This might include consideration of the impact on, for example: pregnant or older drivers who may have a higher propensity to park illegally for accessibility reasons, whilst not being disabled; those with a poorer understanding of English who may be less likely to understand the restrictions; younger drivers who

generally have a lower disposable income and who may find it more difficult to pay. There will be other considerations relevant to the local authority and their community.

As I am sure you can appreciate, in these unprecedented times capacity to analyse the information provided and conclude the decision-making process is affected, so it may take longer than we would hope. Thank you for your patience.

Yours sincerely,

Tim Steer

Assistant Director

Transport, Infrastructure and Connectivity Unit

No	Question	Ealing & Hounslow Response
1	<p>The information provided in the submission covers the financial year 2018/19. Is any updated information about PCNs issues in 2019/20 (or part year) available and any analysis from the borough of whether trends are continuing?</p>	<p>The submissions from both boroughs contained the most recent full-year figures available at the time of drafting as this took place during the 2019/20 year.</p> <p>During the 2019/20 year, both boroughs mobilised new parking enforcement contracts as well as Parking IT, Parking Payment and Enforcement Agents which involved numerous changes for the process, contractors and operations (in the short term). In Ealing there was also a change of main contractor.</p> <p>Additionally, both boroughs were also subjected to prolonged (and possibly coordinated) industrial dispute with their (contractors) workforce that has only recently been resolved. These factors combined to produce significant underperformance within both enforcement teams, but particularly Ealing, with Ealing issuing 63,689 Parking PCNs for 2019/20 and Hounslow issuing 99,628 Parking PCNs.</p> <p>Ealing in effect experienced a full year of (industrial relations) disruption that has only recently concluded, whereas in Hounslow that action only manifested towards the latter part of the year.</p> <p>As example the LB Hounslow Parking PCN figure for the eight months April – November 2019/20 was 74, 386 compared with 66, 311 for the same period the year before. Had these factors not impacted on service delivery, the Council's expectation that the full-year outturn for Parking PCNs in 2019/20 would have been 113,250. This would have represented a further increase of 12.2% on the previous year and a total uplift of 39.3% from the baseline year of 2016/17</p> <p>There was an additional smaller impact in both boroughs towards the latter part of March 2020 as COVID and Lockdown took effect.</p> <p>This in no way detracts from the necessity to make this (banding) change and in fact, introduced a new element of urgency.</p> <p>The focus for both boroughs (from a network and parking perspective) as we emerge from Lockdown is to prepare for the expected challenge that we expect to see in September. The network in both boroughs is likely to come under unprecedented pressure as the nation returns to normal or perhaps better phrased as "its new normal". Neither Council had seen any evidence to lead them to believe that the pressure on their parking resource will recede. Both councils feel that the contrary is more likely to occur with event more pressure being exerted across the network.</p>

We attach an excerpt from a TfL press briefing which objectively sets out the challenges facing London Boroughs. Ensuring compliance is as high as possible will be critical to ensuring the network works as effectively as possible. We believe that increasing the PCN value (which we were seeking to do before this occurrence) will act as an essential lever in this challenge. Both boroughs would like to have this change in place as part of that preparation for September, in particular in respect to the enforcement of mandatory cycle lanes with Approved Devices.

TfL – Press Background Release

With London’s public transport capacity potentially running at a fifth of pre-crisis levels, millions of journeys a day will need to be made by other means. If people switch only a fraction of these journeys to cars, London risks grinding to a halt, air quality will worsen, and road danger will increase.

To prevent this from happening, TfL will rapidly repurpose London's streets to serve this unprecedented demand for walking and cycling in a major new strategic shift.

Early modelling by TfL has revealed there could be more than a 10-fold increase in kilometres cycled, and up to five times the amount of walking, compared to pre-COVID levels, if demand returns.

TfL, working with London’s boroughs will make changes - unparalleled in a city London’s size – to focus on three key areas:

- The rapid construction of a strategic cycling network, using temporary materials, including new routes aimed at reducing crowding on Underground and train lines, and on busy bus corridors.
- A complete transformation of local town centres to enable local journeys to be safely walked and cycled where possible. Wider footways on high streets will facilitate a local economic recovery, with people having space to queue for shops as well as enough space for others to safely walk past while socially distancing.
- Reducing traffic on residential streets, creating low-traffic neighbourhoods right across London to enable more people to walk and cycle as part of their daily routine, as has happened during Lockdown.

2	<p>The submission does not reference any consultation undertaken with stakeholders, including neighbouring local authorities. Could you please confirm if any were contacted as part of the consultation process?</p>	<p>Neither Council undertook specific formal consultation with neighbouring boroughs before the application to London Councils' Transport & Environment Committee (TEC), which is a non-legislative step.</p> <p>A public consultation was carried out which was open to all to participate in, including other London Councils. However, there was no real expectation that councils would engage through that medium.</p> <p>Each borough prepared an initial application which was sent to London Councils' Transport & Environment Committee (TEC) which has a representative from each of the councils that make up London. Councils are free to review, comment, express opinion on, or object to, any matter that goes before TEC, including applications to re-band PCN values. Both Ealing and Hounslow viewed that as an appropriate process to engage with its neighbours and indeed the broader collective of London Councils at the same time and in the same manner.</p> <p>No expressions of concern were received, and both boroughs consider this process to be an effective consultation opportunity and process.</p>
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3	<p>Lastly, as you are aware under section 149 of the Equality Act 2010 ('the Equality Act'), as a public authority, the Mayor must have due regard, when making a decision, to the need to eliminate unlawful discrimination, harassment and victimisation, and to advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not. Our analysis suggests there could be further consideration of the impact of the proposal on people with protected characteristics. While the impact on individuals with protected characteristics who don't park unlawfully appears to have been identified, the impact on individuals with protected characteristics who park unlawfully doesn't appear to have been expressly identified. To ensure this duty is met, it would be helpful for the authority to consider any possible detrimental impact on people with protected characteristics, ensure this has been fully considered in the decision making and that this is fully represented in the information provided to the Mayor. This might include consideration of the impact on, for example: pregnant or older drivers who may have a higher propensity to park illegally for accessibility reasons, whilst not being disabled; those with a poorer understanding of English who may be less likely to understand the restrictions; younger drivers who generally have a lower disposable income and who may find it more difficult to pay. There will be other considerations relevant to the local authority and their community.</p>	<p>We have not seen the analysis you refer to in this question; however, can comment:</p> <p>Both boroughs see this change as a positive step for both protected and non-protected communities.</p> <p>To specifically address the examples you provide both boroughs have in the past (and will continue to do so in the future) applied common-sense mitigations when considering matters pertaining to PCNs when dealing with, for example, pregnant or older drivers.</p> <p>Both enforcement teams are well trained and generally contain a high percentage of long service staff which results in a sophisticated and practical approach to dealing both on-street and within the back office with vulnerable and disadvantaged groups.</p> <p>Again both workforces reflect the diversity of their local communities which results in a high percentage of multilingual CEOs that are available to assist in the first instance should it be required, to achieve compliance with the regulations offering advice when required and applying a common-sense approach to their duties.</p> <p>Again, our back-office teams are well trained, and regularly accept mitigation in the types of cases you describe and will continue to do so going forward.</p> <p>As part of our preparation for this response, we have carried out an extensive search of other London Enforcement Authorities public records.</p> <p>We cannot find a single example of a Band A authority having cause to re-consider its banding status for reasons such as those given in your question. This gives both organisations a high degree of confidence that the example scenarios you outline can be managed effectively and without adverse impact on these communities.</p> <p>We also note that in the public consultation carried out as part of this process, of the respondents that specifically identified themselves as "Disabled", 63% Strongly Agreed with this change.</p> <p>We further note that the cost of running a car in London is placed between £1,500 - £2,500 per year (dependent on mileage, fuel type, insurance cover, permit cost etc.) excluding the cost of the vehicle.</p> <p>With each car in London on average receiving a PCN every other year, the £10 variance between Band A and Band B (every two years) is highly unlikely to be the defining financial consideration in respect to motoring (discounted payment rate for both Higher and Lower contraventions), whereas the percentage increase from a PCN perspective is notable and should drive change (the logic of the existing Band A councils).</p>
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[Redacted]

From: [Redacted]@hounslow.gov.uk>
Sent: 04 March 2021 09:31
To: [Redacted]
Subject: Re: Response from Ealing and Hounslow re Band Change Request
Attachments: LBH ReBanding EIA .pdf; report-23-February-2021--13-45.pdf

Morning [Redacted]

As per [Redacted] email the information requested in relation to LB Hounslow application for PCN rebanding is attached. This included the Equalities assessment and consultation response.

Please let me know if you require anything further.

Regards

[Redacted]
[Redacted]
Transport, Parking and Environmental Strategy
2nd Floor, Hounslow House
London Borough of Hounslow
Office: [Redacted]

From: [Redacted]@london.gov.uk>
Sent: 22 February 2021 11:27
To: Mark Frost [Redacted]@hounslow.gov.uk>; [Redacted]@hounslow.gov.uk>; Tom [Redacted]
[Redacted]@hounslow.gov.uk>

Cc: [Redacted]
Subject: RE: Response from Ealing and Hounslow re Band Change Request

Morning all,

We do not yet appear to have received the additional information requested in December, but in the meantime I wanted to update you on two points:

[Redacted] and will be able to take this forward when you've been able to provide the information requested.

To also note, we do not anticipate the Mayor taking a decision on this sort of request during the pre-election period. As you know, this starts in a month and there are various processes we need to go through once we have the information requested. As such it's likely that any decision on this request would now have to be considered after the election, assuming the information requested below is provided. I am sorry for the further delay to this matter, but hope you can understand why that's the case. Any questions before I go, please do drop me a line.

Kind regards,

[Redacted]

From: Mark Frost [Redacted]@hounslow.gov.uk>
Sent: 17 December 2020 14:38

To: [Redacted]
[Redacted]

Cc: [Redacted]
[Redacted]

Subject: RE: Response from Ealing and Hounslow re Band Change Request

Hi [Redacted] is working with [Redacted] and will send through the documents required shortly.

Best,

Mark Frost



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From: [redacted] [@london.gov.uk](mailto:[redacted]@london.gov.uk)>

Sent: 17 December 2020 14:34

To: [redacted]

Subject: RE: Response from Ealing and Hounslow re Band Change Request

Hi [redacted] / colleagues

I passed this inquiry on to [redacted] on Tuesday as I got [redacted] out of office. Are any Hounslow colleagues able to provide the below (or is there another colleague I can try?) Unfortunately if I don't receive by Monday I won't be able to submit into the report into our decision making until the new year, and this will delay this going to the Mayor by a couple of weeks given meetings being cancelled over the Christmas period.

Please do let me know if it's likely you'll be able to provide the below. Otherwise, if [redacted] is able to pick up in the new year I expect this will be considered by the Mayor in late Jan, rather than earlier in the month.

Many thanks,

[redacted]

From: [redacted]

Sent: 15 December 2020 16:11

To: [redacted] [@hounslow.gov.uk](mailto:[redacted]@hounslow.gov.uk)>

Cc: [redacted]

Subject: RE: Response from Ealing and Hounslow re Band Change Request

Good afternoon [redacted],

We're in the process with getting papers ready for the Mayor to consider this request. Could I request two further items that we'd like to include when presenting to the Mayor:

- A copy of your equalities relevance test/ screening assessment
- LB Hounslow's report/response to their consultation

In terms of timing, we are aiming to get a report to the Mayor at the first opportunity in early January, and will of course update you if it's approved. We'd then immediately send the letter to the SoS to start that element of the process and I'll share a copy should that proceed.

Kind regards,

[redacted]

Transport Team Manager, Transport, Infrastructure and Connectivity

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City Hall, The Queen's Walk, London SE1 2AA

[redacted] note auto forwarded to mobile telephone)

london.gov.uk

[redacted] [@london.gov.uk](mailto:[redacted]@london.gov.uk)

From: [redacted] [@hounslow.gov.uk](mailto:[redacted]@hounslow.gov.uk)>

Sent: 19 November 2020 15:59

To: [redacted]

Subject: Re: Response from Ealing and Hounslow re Band Change Request

Hi [redacted]

Further to your request for clarification on our proposed implementation date The London Borough of Hounslow are now proposing 1 April 2021. Hopefully, this will allow sufficient time for our application to be considered.

If approved, it would also allow sufficient time to publicise both the move to Band A and the rationale behind it. If this change is to have the desired effect in deterring motorist contravening, then it is imperative that this message is put out. This date would also allow time for any system changes to be made.

Please do not hesitate contacting me if you need any further information.

Regards

[REDACTED]
Transport, Parking and Environmental Strategy
2nd Floor, Hounslow House
London Borough of Hounslow
Office: [REDACTED]

From: [REDACTED] <[REDACTED]@londoncouncils.gov.uk>

Sent: 17 November 2020 14:06

To: [REDACTED] <[REDACTED]@hounslow.gov.uk>

Cc: [REDACTED]

Subject: FW: Response from Ealing and Hounslow re Band Change Request

Hi [REDACTED]

Please see the below email from [REDACTED] of the GLA, namely the bit highlighted in yellow which requires a response from LB Hounslow.

I would be grateful if you could respond directly to [REDACTED] (and copy myself and [REDACTED] into your response). Hopefully despite the regrettable delay, this will get signed off by the GLA soon for approval by the Secretary of State.

Any problems, please let me know.

Many thanks

[REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 17 November 2020 12:15

To: [REDACTED] <[REDACTED]@londoncouncils.gov.uk>; Tim Steer <>

Cc: [REDACTED] <[REDACTED]@londoncouncils.gov.uk>

Subject: RE: Response from Ealing and Hounslow re Band Change Request

[REDACTED],

Having now reviewed the additional and previous information from Hounslow, I have the same follow up to request from Hounslow please. Are you able to pass this on and provide a response?

In their initial letter to the Mayor there was no intended implementation date. In their most recent correspondence they refer to September, given the anticipated impact on traffic levels and pressure on parking coming out of lockdown. I appreciate there has been many months and changing situations with Covid-19 in between that letter and now given there was some delay in receiving this. **Please could the borough confirm if they have a new implementation date in mind and provide a brief explanation for this?**

We'll start processing the necessary materials for this pending that follow up, as we can reflect in the materials once received.

Thanks

[REDACTED]

From: [REDACTED] <[REDACTED]@londoncouncils.gov.uk>

Sent: 02 November 2020 16:36

To: [REDACTED] <[REDACTED]@london.gov.uk>; Tim Steer <[REDACTED]@london.gov.uk>

Cc: [REDACTED] <[REDACTED]@londoncouncils.gov.uk>

Subject: RE: Response from Ealing and Hounslow re Band Change Request

Thanks [REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 02 November 2020 16:29

To: [REDACTED] <[REDACTED]@londoncouncils.gov.uk>; Tim Steer <[REDACTED]@london.gov.uk>

Cc: [REDACTED] <[REDACTED]@londoncouncils.gov.uk>

Subject: RE: Response from Ealing and Hounslow re Band Change Request

Great, thank you for confirming. Appreciate it's challenging for the boroughs, but helpful for them to understand our need to resource this end and process properly.

I'll be in touch ASAP with an update.

From: [REDACTED] <[REDACTED]@londoncouncils.gov.uk>

Sent: 02 November 2020 16:28

To: [REDACTED] <[REDACTED]@london.gov.uk>; Tim Steer <[REDACTED]@london.gov.uk>

Cc: [REDACTED] <[REDACTED]@londoncouncils.gov.uk>

Subject: RE: Response from Ealing and Hounslow re Band Change Request

Hi [REDACTED]

No worries and thanks

Yes they are aware of this. They initially sent the details over to us in July and we had assumed that they had responded directly to yourselves and only sent us a copy for our records. It would appear that we had our wires crossed and they had expected us to send it to you, hence the September commencement date (which was a tad ambitious any way!).

We have explained the situation and the fact that this can take time to fully review the application.

Many thanks

From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 02 November 2020 15:52

To: [REDACTED] <[REDACTED]@londoncouncils.gov.uk>; Tim Steer <[REDACTED]@london.gov.uk>

Cc: [REDACTED] <[REDACTED]@londoncouncils.gov.uk>

Subject: RE: Response from Ealing and Hounslow re Band Change Request

Hi [REDACTED]

Thanks for sending over, I'm looking over these applications for the team. We will need to look over this and I'll get back to you on next steps once we've had a chance to review.

I see the attached references both boroughs wanting to put this in place from September. Clearly that's not possible now; are the boroughs aware we have only just received this information? I'd also suggest managing expectations regarding the process for these applications given our need to formally review information, prepare reports to the Mayor if appropriate and then the statutory timelines re SOS notification and notification to residents.

Thanks,

From: [REDACTED] <[REDACTED]@londoncouncils.gov.uk>

Sent: 02 November 2020 11:02

To: [REDACTED] <[REDACTED]@london.gov.uk>

Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@londoncouncils.gov.uk>

Subject: Response from Ealing and Hounslow re Band Change Request

Good morning

Please see the attached response from Ealing and Hounslow responding the questions that the GLA had regarding their band change requests.

Apologies for the delay in forwarding this, I had assumed that the boroughs had responded directly but unfortunately they had not.

Many thanks

Transport Manager

[REDACTED] <[REDACTED]@londoncouncils.gov.uk>

London Councils

59½ Southwark Street

London SE1 0AL

Equalities Impact Assessment

1. Proposal Summary Information

EIA Title	London Borough of Hounslow, Parking Penalty Charge Notice Re-Banding
Please describe your proposal?	To Re-Band Parking Penalty Charge Notices from the current Band B to the higher Band A
Is it HR Related?	No
Corporate Purpose	
Date	December 2019
Prepared By	

1. What is the proposal looking to achieve? Who will be affected?

Currently, two levels of charging operate within London for parking Penalty Charge Notices (PCN), which are more commonly known as parking tickets. The two-levels are Band A (the higher level of charge) and Band B (the lower level of charge).

The London Borough of Hounslow is a Band B borough for parking offences meaning that the lower set of charges apply, as shown in Table 1 below. This proposal would see Hounslow move into the Higher Band A from its current Band B.

Within each Band, there is a further higher / lower split for offences that are perceived to be more or less serious. In general terms, less serious offences tend to be things like overstaying in a car park or Pay & Display Bay, while more serious offences tend to be things like parking in a Bus Stop or Disabled Bay. In all instances, a 14-day 50% discount rule applies for early payments.

The higher and lower charges for both Bands are shown in Table 1 below, alongside the discounted charges:

Table 1: Comparison of Band A and Band B PCN charges

PCN Band Level	Higher charge	Discount higher charge	Lower charge	Discount lower charge
B (Current level)	£110	£55	£60	£30
A (Proposed level)	£130	£65	£80	£40

This proposal would see Hounslow move into the Higher Band A from its current Band B

Equalities Impact Assessment

The charging bands were last reviewed in 2011 and have not changed since then. The bands apply only to Parking contraventions, as all Bus Lane and Traffic offences are already at the Band A level across all London Boroughs.

In real terms, this means that a PCN issued for overstaying in a Car Park could be settled at £30 or for parking in a Disabled Bay for £55 within a Band B borough.

Two groups will be mainly impacted by this change one directly, one indirectly.

Direct Impact

This change will directly impact the driver or keeper of a vehicle that receives a Penalty Charge Notice for illegal parking. They will see an increase of £10 in the basic amount they can settle a Penalty Charge Notice.

Indirect Impact

Several groups should see an indirect **Positive** impact from this change as compliance improves. They would include:

- Disabled Motorists – as non-compliance in Disabled Bays will carry a higher penalty and therefore be discouraged to a greater degree.
- Public Transport Users – as illegal parking in Bus Stops will carry a higher penalty and therefore be discouraged to a greater degree reducing the incidents where buses are unable to pull to the kerb, which in turn reduces the inconvenience experienced by wheelchair users, pushchair/buggy users and the elderly.
- Pedestrians, particularly wheelchair users and pushchair/buggy users - as illegal parking on footways will carry a higher penalty and therefore be discouraged to a greater degree, reducing the instances that they will have to manoeuvre around illegally parked cars (often by using the carriageway)

Equalities Impact Assessment

2. What will the impact of your proposal be?

The primary impact will be to increase the Parking Penalty Charge Amount per the following table.

PCN Band Level	Higher charge	Discount higher charge	Lower charge	Discount lower charge
B (Current level)	£110	£55	£60	£30
A (Proposed level)	£130	£65	£80	£40

This would have the effect of making illegal parking less attractive and improve compliance with the restrictions across the borough. This would drive other secondary impacts for the groups outlined in Section 1.

Equalities Impact Assessment

2. Impact on Groups having a Protected Characteristic

AGE: *A person of a particular age or being within an age group.*

Positive, no negative impact is foreseen.

Describe the Impact

If a particular person is wholly or mostly dependent on car or vehicular travel (e.g., older people with a significant mobility impairment), this proposal is expected to have a **Positive** impact as the increased penalty will most likely drive higher compliance in Disabled Bays the majority of which are used by older people.

The impact on children is expected to be **Positive**. Road safety in the residential area is expected to be improved with greater compliance with the parking regulations, allowing more walking and cycling in the area.

For those who are able to walk and cycle and choose to utilise active travel modes, the scheme is expected to be **Positive** with an associated lower road safety risk.

Describe the Mitigating Action

The back office team who deal with Pre-NTO challenges and Formal Representations will receive additional training to allow them to identify any issues arising from this change as a result of this change.

DISABILITY: *A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out typical day to day activities¹.*

Positive, no negative impact is foreseen.

Describe the Impact

If a particular person is wholly or mostly dependent on car or vehicular travel (e.g., older people with a significant mobility impairment), this proposal is expected to have a **Positive** impact as the increased penalty will most likely drive higher compliance in Disabled Bays.

Equalities Impact Assessment

Describe the Mitigating Action
The back office team who deal with Pre-NTO challenges and Formal Representations will receive additional training to allow them to identify any issues arising from this change as a result of this change.

GENDER REASSIGNMENT: <i>This is the process of transitioning from one sex to another. This includes persons who consider themselves to be trans, transgender and transsexual.</i>
No additional impact
Describe the Impact
There is no clear evidence, data or rationale to expect that this proposal will have a differential impact on people with this characteristic.
Describe the Mitigating Action
The back office team who deal with Pre-NTO challenges and Formal Representations will receive additional training to allow them to identify any issues arising from this change as a result of this change.

RACE: <i>A group of people defined by their colour, nationality (including citizenship), ethnic or national origins or race.</i>
Positive impact (Low)
Describe the Impact
Data suggests that the BAME population is less likely to own a private motor vehicle more likely to use Public Transport, particularly the local Bus Network. This proposal is likely to have a positive impact on the efficient running of the bus network, thereby having a Positive impact on the users of that service.
Describe the Mitigating Action
The back office team who deal with Pre-NTO challenges and Formal Representations will receive additional training to allow them to identify any issues arising from this change as a result of this change.

Equalities Impact Assessment

RELIGION & BELIEF: <i>Religion means any religion. Belief includes religious and philosophical beliefs including lack of belief (for example, Atheism). Generally, a belief should affect a person's life choices or the way you live for it to be included.</i>
Low Positive Impact
Describe the Impact
<p>The council already has a well-developed system for facilitating parking as religious establishments and for religious events.</p> <p>Improved compliance with the prevailing parking restrictions will mean that motorists that are eligible to park under one these arrangements above may find it easier to find a space if compliance is higher than if it was lower.</p>
Describe the Mitigating Action
<p>The back office team who deal with Pre-NTO challenges and Formal Representations will receive additional training to allow them to identify any issues arising from this change as a result of this change.</p>

SEX: <i>Someone being a man or a woman.</i>
No additional impact
Describe the Impact
<p>There is no clear evidence, data or rationale to expect that this change will have a differential impact on people with this characteristic.</p>
Describe the Mitigating Action
<p>The back office team who deal with Pre-NTO challenges and Formal Representations will receive additional training to allow them to identify any issues arising from this change as a result of this change.</p>

SEXUAL ORIENTATION: <i>A person's sexual attraction towards his or her own sex, the opposite sex or to both sexes.</i>
No additional impact
Describe the Impact
<p>There is no clear evidence, data or rationale to expect that these works will have a differential impact on people with this characteristic.</p>
Describe the Mitigating Action

Equalities Impact Assessment

The back office team who deal with Pre-NTO challenges and Formal Representations will receive additional training to allow them to identify any issues arising from this change as a result of this change.

PREGNANCY & MATERNITY: *Description: Pregnancy: Being pregnant. Maternity: The period after giving birth - linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, including as a result of breastfeeding.*

No additional impact

Describe the Impact

There is no clear evidence, data, or rationale to expect that this change will have a differential impact on people with this characteristic.

While this group *may* have a greater reliance on the car due to some potential reduced mobility issues, no data would suggest that they are at a greater risk of receiving a Penalty Charge Notice.

Describe the Mitigating Action

The back office team who deal with Pre-NTO challenges and Formal Representations will receive additional training to allow them to identify any issues arising from this change as a result of this change.

MARRIAGE & CIVIL PARTNERSHIP: *Marriage: A union between a man and a woman. or of the same sex, which is legally recognised in the UK as a marriage
Civil partnership: Civil partners must be treated the same as married couples on a range of legal matters.*

No additional impact

Describe the Impact

There is no clear evidence, data or rationale to expect that these works will have a differential impact on people with this characteristic.

Describe the Mitigating Action

Not applicable.

Equalities Impact Assessment

3. Human Rights²

3a. Does your proposal impact on Human Rights as defined by the Human Rights Act 1998?

Articles 1 and Article 8 of the Protocol to the European Convention of Human Rights (which are enshrined in the 1998 Act) confirm as follows:

Article 1 "Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and the general principles of international law. The preceding provisions shall not, however, in any way impair the right of the state to enforce such laws as it deems necessary to control the use of property in accordance with the general interest...."

Article 8 "Everyone has the right to respect for his private and family life, his home and his correspondence. There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country. For the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others'.

To the extent that Articles 1 and/or 8 applies it is considered that moving to the higher Band A Parking Penalty Charge amount is justified in the public interest given the anticipated positive outcomes outlined above.

3b. Does your proposal impact on the rights of children as defined by the UN Convention on the Rights of the Child?

No

3c. Does your proposal impact on the rights of persons with disabilities as defined by the UN Convention on the rights of persons with disabilities?

Yes, the proposed change may have a **Positive** impact on persons with disabilities who drive a motor vehicle or use public transport (specifically buses) or use the footway particular if they use a wheelchair.

4. Conclusion

There are not expected to be any significant **Negative** impacts on any groups with protected characteristics, other than the impact seen by all motorists should they receive a PCN, i.e. an increase in £10 against the basic amount a PCN can be settled at.

The proposal does, however, deliver several secondary benefits that should have varying degrees of **Positive** impact for several groups with protected characteristics.

All impacts will be closely monitored, and any on-going adverse impacts will be reviewed for additional mitigating action.

Equalities Impact Assessment

4a. What evidence, data sources, and intelligence did you use to assess the potential impact/effect of your proposal? Please note the systems/processes you used to collect the data that has helped inform your proposal. Please list the file paths and/or relevant web links to the information you have described.

- https://www.Hounslow.gov.uk/info/201178/parking/763/contact_us_parking/1
- <http://content.tfl.gov.uk/BAME.pdf>
- <http://content.tfl.gov.uk/travel-in-london-report-11.pdf>

Appendix 1: Legal obligations under Section 149 of the Equality Act 2010:

- As a public authority, we must have due regard to the need to:
 - a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- The protected characteristics are: AGE, DISABILITY, GENDER REASSIGNMENT, RACE, RELIGION & BELIEF, SEX, SEXUAL ORIENTATION, PREGNANCY & MATERNITY, MARRIAGE & CIVIL PARTNERSHIP
- Having due regard to advancing equality of opportunity between those who share a protected characteristic and those who do not, involves considering the need to:
 - a) Remove or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
 - b) Take steps to meet the needs of persons who share a relevant characteristic that are different from the needs of the persons who do not share it.
 - c) Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- Having due regard to fostering good relations between persons who share a relevant protected characteristic and persons who do not, involves showing that you are tackling prejudice and promoting understanding.
- Complying with the duties may involve treating some people more favourably than others; but this should not be taken as permitting conduct that would be otherwise prohibited under the Act.



Parking Ticket Charges - Proposed Increase : Summary report

This report was created on Tuesday 23 February 2021 at 13:45 and includes **89** responses.

The consultation ran from 13/12/2019 to 28/01/2020.

Contents

Question 1: What is your name?	1
Name	1
Question 2: What is your email address?	1
Email	1
Question 3: What is your postcode?	1
Postcode	1
Question 4: Please select the statement(s) which apply to you regarding your relationship to the borough.	2
Relationship to borough	2
Other	2
Question 5: Do you support the council applying to become a Band A borough, so Penalty Charge Notices (parking tickets) are charged at a higher amount?	2
Support	2
Question 6: Please use this space to say why you support / don't support the proposal, and to add any other comments you would like to share.	3
Comments	3
Question 7: What is your gender?	3
What is your gender	3
Question 8: What is your age?	3
what is your age	3
Question 9: What is your ethnicity?	4
ethnicity	4
Question 10: Do you consider yourself to have a disability?	4
Disability	4
Question 11: If your answer to the previous question was yes, please indicate the type of disability which applies to you. People may experience more than one type of disability, in which case tick all types that apply. If your disability does not fit any of these types, please specify 'other'.	5
type of disability	5
Other	5

Question 1: What is your name?

Name

There were **76** responses to this part of the question.

Question 2: What is your email address?

Email

There were **70** responses to this part of the question.

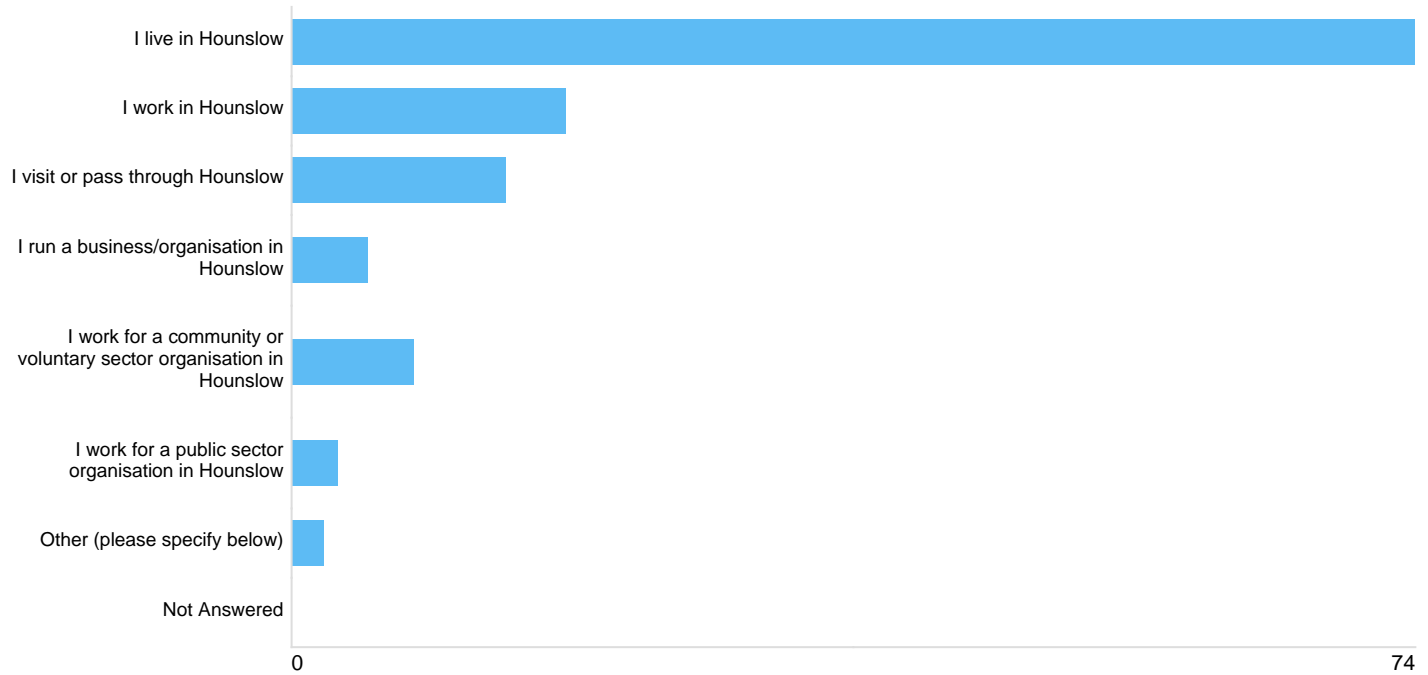
Question 3: What is your postcode?

Postcode

There were **73** responses to this part of the question.

Question 4: Please select the statement(s) which apply to you regarding your relationship to the borough.

Relationship to borough



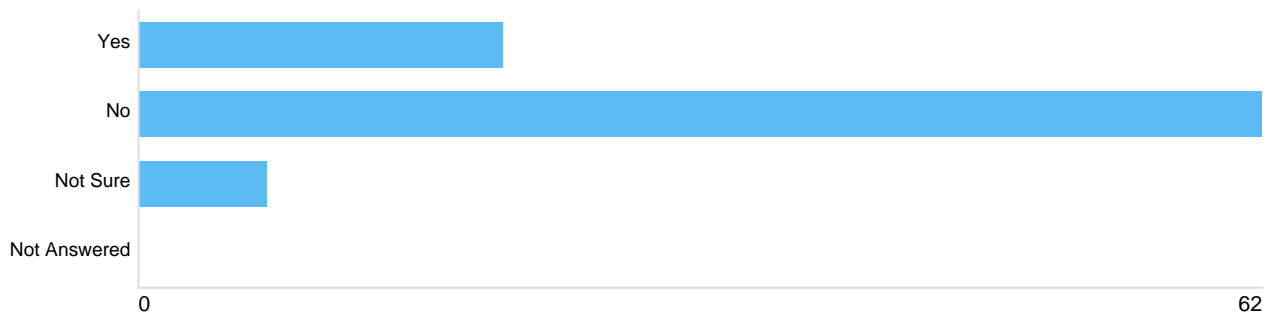
Option	Total	Percent
I live in Hounslow	74	83.15%
I work in Hounslow	18	20.22%
I visit or pass through Hounslow	14	15.73%
I run a business/organisation in Hounslow	5	5.62%
I work for a community or voluntary sector organisation in Hounslow	8	8.99%
I work for a public sector organisation in Hounslow	3	3.37%
Other (please specify below)	2	2.25%
Not Answered	0	0.00%

Other

There were 4 responses to this part of the question.

Question 5: Do you support the council applying to become a Band A borough, so Penalty Charge Notices (parking tickets) are charged at a higher amount?

Support



Option	Total	Percent
Yes	20	22.47%
No	62	69.66%
Not Sure	7	7.87%
Not Answered	0	0.00%

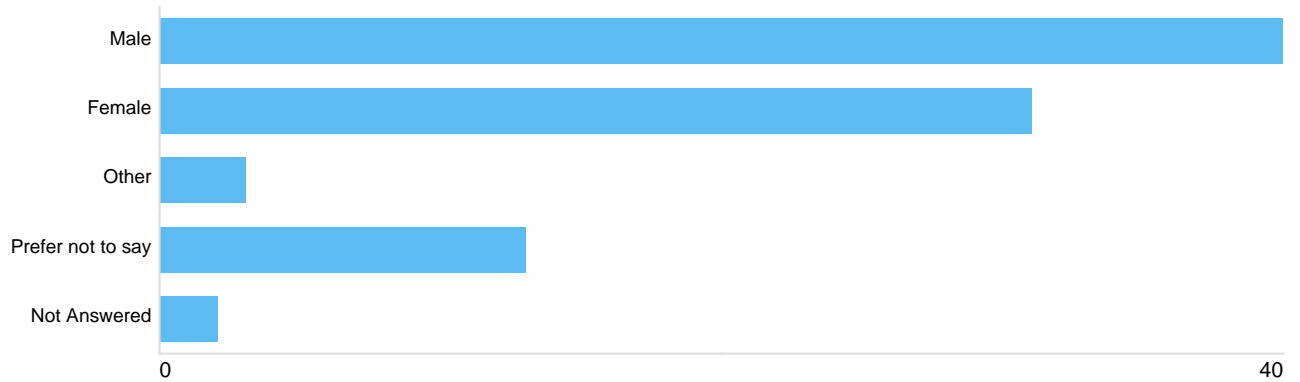
Question 6: Please use this space to say why you support / don't support the proposal, and to add any other comments you would like to share.

Comments

There were 75 responses to this part of the question.

Question 7: What is your gender?

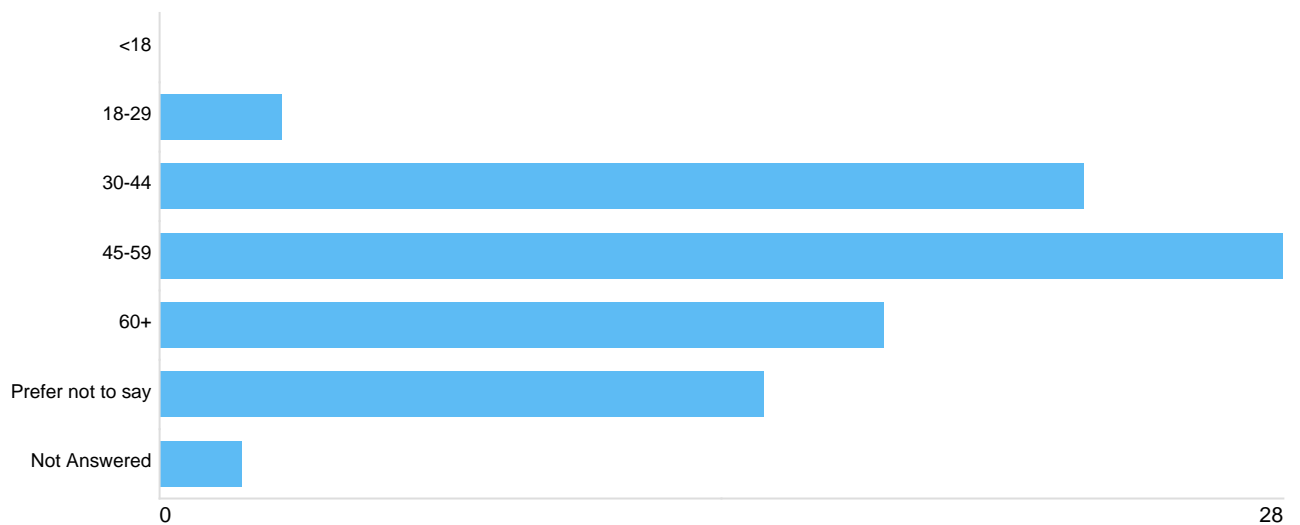
What is your gender



Option	Total	Percent
Male	40	44.94%
Female	31	34.83%
Other	3	3.37%
Prefer not to say	13	14.61%
Not Answered	2	2.25%

Question 8: What is your age?

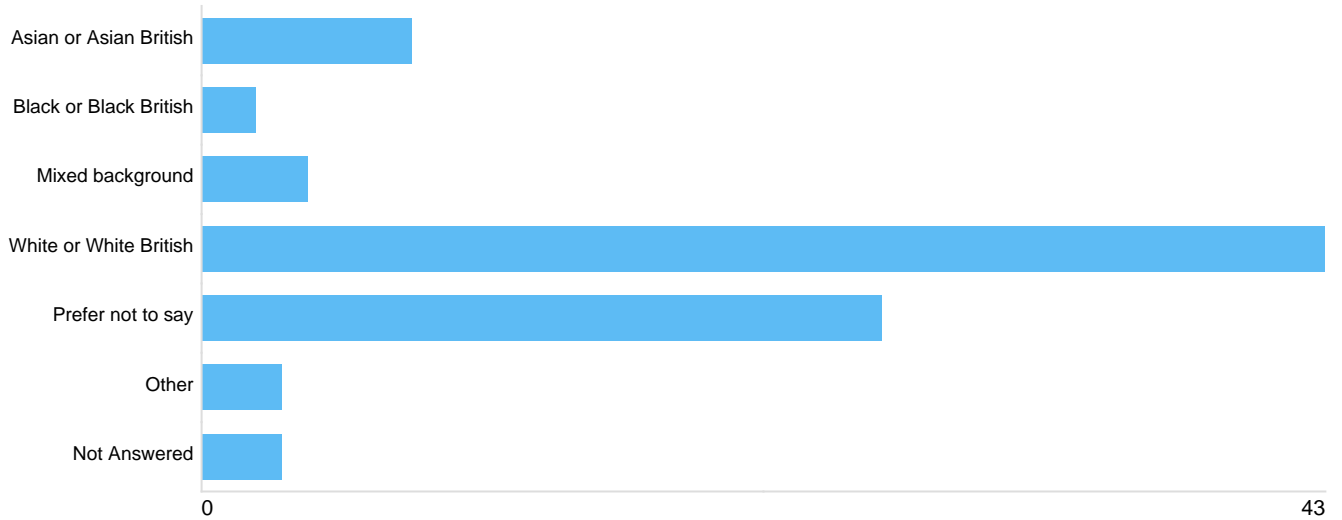
what is your age



Option	Total	Percent
<18	0	0.00%
18-29	3	3.37%
30-44	23	25.84%
45-59	28	31.46%
60+	18	20.22%
Prefer not to say	15	16.85%
Not Answered	2	2.25%

Question 9: What is your ethnicity?

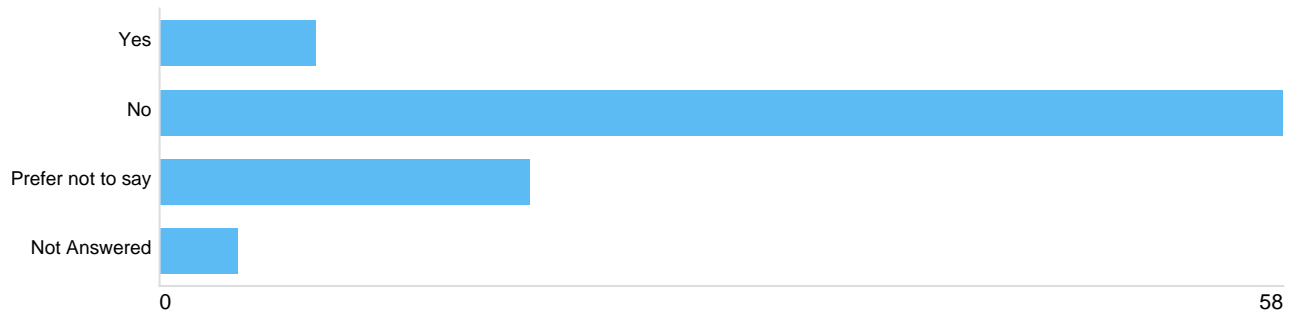
ethnicity



Option	Total	Percent
Asian or Asian British	8	8.99%
Black or Black British	2	2.25%
Mixed background	4	4.49%
White or White British	43	48.31%
Prefer not to say	26	29.21%
Other	3	3.37%
Not Answered	3	3.37%

Question 10: Do you consider yourself to have a disability?

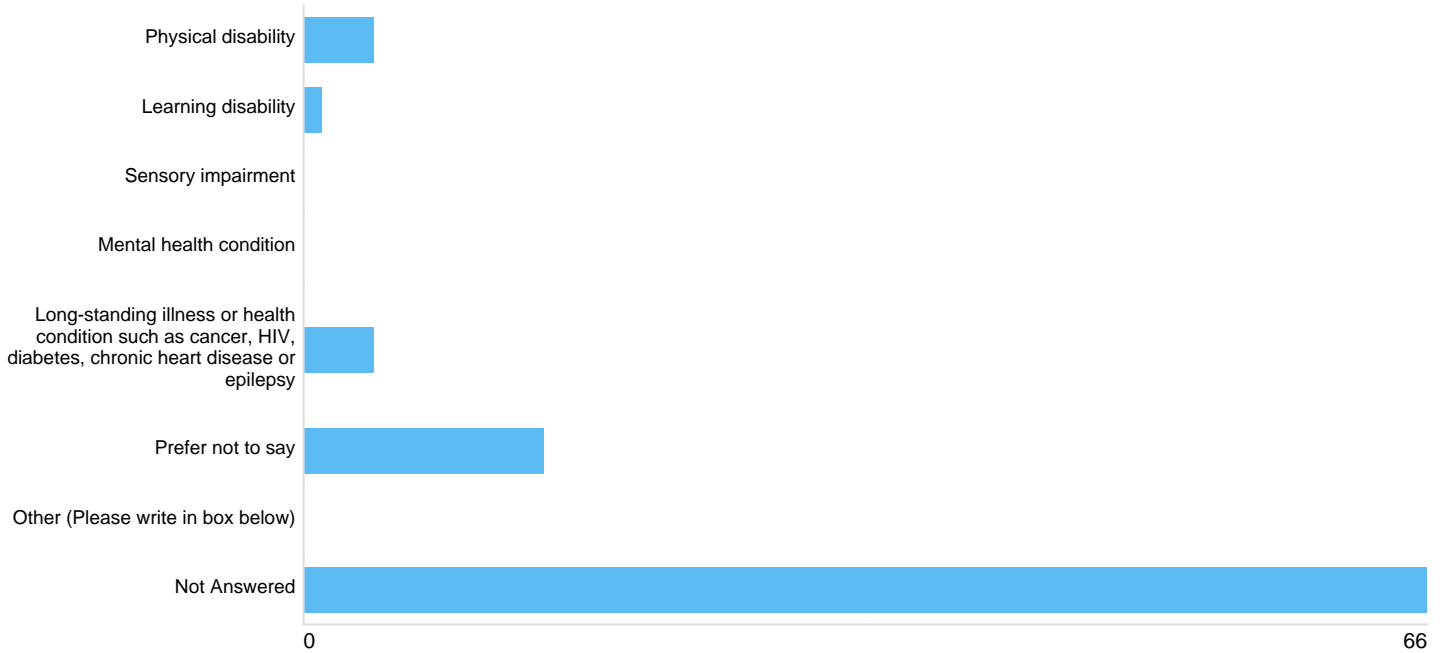
Disability



Option	Total	Percent
Yes	8	8.99%
No	58	65.17%
Prefer not to say	19	21.35%
Not Answered	4	4.49%

Question 11: If your answer to the previous question was yes, please indicate the type of disability which applies to you. People may experience more than one type of disability, in which case tick all types that apply. If your disability does not fit any of these types, please specify 'other'.

type of disability



Option	Total	Percent
Physical disability	4	4.49%
Learning disability	1	1.12%
Sensory impairment	0	0.00%
Mental health condition	0	0.00%
Long-standing illness or health condition such as cancer, HIV, diabetes, chronic heart disease or epilepsy	4	4.49%
Prefer not to say	14	15.73%
Other (Please write in box below)	0	0.00%
Not Answered	66	74.16%

Other

There were 2 responses to this part of the question.

[REDACTED]

From: [REDACTED]@hounslow.gov.uk>
Sent: 12 July 2021 07:53
To: [REDACTED]
Subject: Re: Response from Ealing and Hounslow re Band Change Request
Attachments: CEX 447 Appendix A PCN rebanding consultation report.docx

Morning [REDACTED]

Attached is the report that was compiled to respond to the consultation. Hopefully this will be sufficient but please let me know if you require anything else.

Regards

[REDACTED]
Traffic, Transport and Parking
2nd Floor, Hounslow House
London Borough of Hounslow
[REDACTED]

From: [REDACTED]@london.gov.uk>
Sent: 02 July 2021 14:48
To: [REDACTED]@hounslow.gov.uk>
Subject: RE: Response from Ealing and Hounslow re Band Change Request

Hi [REDACTED]

Apologies for the delay in responding to you. I should have confirmed that I shared the papers and information you provided with our legal team shortly after receiving these. Legal have now reviewed those and had the following comments:

“We previously requested Hounslow’s response to the consultation. The report they provided (attached) is a summary of the consultation responses they received whilst useful and will be annexed to the MD we still do not have all of the information required. Hounslow have not provided the report or response they provided in response to the consultation. Given the low percentage of support from the public (22%) it is important that we see how Hounslow have considered the consultation results, we would expect to see some evidence of consideration of the results.”

The draft Mayoral Decision is pretty much ready to go once we receive this final documentation from you so we should be able to proceed fairly quickly after that. Feel free to get in touch on [REDACTED] you’d like to discuss further.

Thanks,
[REDACTED]

From: [REDACTED]@hounslow.gov.uk>
Sent: 04 March 2021 09:31
To: [REDACTED]@london.gov.uk>
Subject: Re: Response from Ealing and Hounslow re Band Change Request

Morning [REDACTED]

As per [REDACTED] email the information requested in relation to LB Hounslow application for PCN rebanding is attached. This included the Equalities assessment and consultation response.

Please let me know if you require anything further.

Regards

[REDACTED]
Transport, Parking and Environmental Strategy
2nd Floor, Hounslow House
London Borough of Hounslow
[REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 22 February 2021 11:27

To: Mark Frost [REDACTED] <[REDACTED]@hounslow.gov.uk>

Cc: [REDACTED]

Subject: RE: Response from Ealing and Hounslow re Band Change Request

Morning all,

We do not yet appear to have received the additional information requested in December, but in the meantime I wanted to update you on two points:

[REDACTED]
[REDACTED] and will be able to take this forward when you've been able to provide the information requested.

To also note, we do not anticipate the Mayor taking a decision on this sort of request during the pre-election period. As you know, this starts in a month and there are various processes we need to go through once we have the information requested. As such it's likely that any decision on this request would now have to be considered after the election, assuming the information requested below is provided. I am sorry for the further delay to this matter, but hope you can understand why that's the case. Any questions before I go, please do drop me a line.

Kind regards,

From: Mark Frost [REDACTED] <[REDACTED]@hounslow.gov.uk>

Sent: 17 December 2020 14:38

To: [REDACTED] <[REDACTED]@london.gov.uk>

[REDACTED] <[REDACTED]@hounslow.gov.uk>

[REDACTED] <[REDACTED]@hounslow.gov.uk>

Cc: [REDACTED]

Subject: RE: Response from Ealing and Hounslow re Band Change Request

Hi [REDACTED] is working with [REDACTED] and will send through the documents required shortly.

Best,

Mark Frost



www.hounslow.gov.uk

Follow us online: Twitter: [@LBofHounslow](https://twitter.com/LBofHounslow) and Facebook: www.facebook.com/HounslowCouncil

From: [REDACTED] [@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>
Sent: 17 December 2020 14:34
To: [REDACTED] [@hounslow.gov.uk](mailto:[REDACTED]@hounslow.gov.uk)>
Cc: [REDACTED] [@londoncouncils.gov.uk](mailto:[REDACTED]@londoncouncils.gov.uk)>; Mark Frost
[REDACTED] [@oaklawn.eu](mailto:[REDACTED]@oaklawn.eu)>
Subject: RE: Response from Ealing and Hounslow re Band Change Request

Hi [REDACTED] / colleagues

I passed this inquiry on to [REDACTED] on Tuesday as I got [REDACTED] out of office. Are any Hounslow colleagues able to provide the below (or is there another colleague I can try?) Unfortunately if I don't receive by Monday I won't be able to submit into the report into our decision making until the new year, and this will delay this going to the Mayor by a couple of weeks given meetings being cancelled over the Christmas period.

Please do let me know if it's likely you'll be able to provide the below. Otherwise, if [REDACTED] is able to pick up in the new year I expect this will be considered by the Mayor in late Jan, rather than earlier in the month.

Many thanks,

From: [REDACTED]
Sent: 15 December 2020 16:11
To: [REDACTED] [@hounslow.gov.uk](mailto:[REDACTED]@hounslow.gov.uk)>
Cc: [REDACTED] Mark Frost
[REDACTED] [@hounslow.gov.uk](mailto:[REDACTED]@hounslow.gov.uk)>; [REDACTED]
Subject: RE: Response from Ealing and Hounslow re Band Change Request

Good afternoon [REDACTED]

We're in the process with getting papers ready for the Mayor to consider this request. Could I request two further items that we'd like to include when presenting to the Mayor:

- A copy of your equalities relevance test/ screening assessment
- LB Hounslow's report/response to their consultation

In terms of timing, we are aiming to get a report to the Mayor at the first opportunity in early January, and will of course update you if it's approved. We'd then immediately send the letter to the SoS to start that element of the process and I'll share a copy should that proceed.

Kind regards,

[REDACTED]

[REDACTED]

Transport Team Manager, Transport, Infrastructure and Connectivity

GREATERLONDONAUTHORITY

City Hall, The Queen's Walk, London SE1 2AA

[REDACTED] auto forwarded to mobile telephone)

london.gov.uk

[REDACTED] [@london.gov.uk](mailto:[REDACTED]@london.gov.uk)

From: [REDACTED] [@hounslow.gov.uk](mailto:[REDACTED]@hounslow.gov.uk)>

Sent: 19 November 2020 15:59

To: [REDACTED] [@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>; Tim Steer [REDACTED] [@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>

Cc: [REDACTED] Mark Frost

Subject: Re: Response from Ealing and Hounslow re Band Change Request

Hi [REDACTED]

Further to your request for clarification on our proposed implementation date The London Borough of Hounslow are now proposing 1 April 2021. Hopefully, this will allow sufficient time for our application to be considered.

If approved, it would also allow sufficient time to publicise both the move to Band A and the rationale behind it. If this change is to have the desired effect in deterring motorist contravening, then it is imperative that this message is put out. This date would also allow time for any system changes to be made.

Please do not hesitate contacting me if you need any further information.

Regards

[REDACTED]
Transport, Parking and Environmental Strategy
2nd Floor, Hounslow House
London Borough of Hounslow
[REDACTED]

From: [REDACTED] [@londoncouncils.gov.uk](mailto:[REDACTED]@londoncouncils.gov.uk)>

Sent: 17 November 2020 14:06

To: [REDACTED] [@hounslow.gov.uk](mailto:[REDACTED]@hounslow.gov.uk)>

Cc: Mark Frost [REDACTED] [@hounslow.gov.uk](mailto:[REDACTED]@hounslow.gov.uk)>; [REDACTED] [@londoncouncils.gov.uk](mailto:[REDACTED]@londoncouncils.gov.uk)>

Subject: FW: Response from Ealing and Hounslow re Band Change Request

Hi [REDACTED]

Please see the below email from [REDACTED] of the GLA, namely the bit highlighted in yellow which requires a response from LB Hounslow.

I would be grateful if you could respond directly to [REDACTED] and Tim Steer (and copy myself and [REDACTED] into your response). Hopefully despite the regrettable delay, this will get signed off by the GLA soon for approval by the Secretary of State.

Any problems, please let me know.

Many thanks

[REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 17 November 2020 12:15
To: [REDACTED] <[REDACTED]@londoncouncils.gov.uk>; Tim Steer <>
Cc: [REDACTED] <[REDACTED]@londoncouncils.gov.uk>
Subject: RE: Response from Ealing and Hounslow re Band Change Request

[REDACTED]

Having now reviewed the additional and previous information from Hounslow, I have the same follow up to request from Hounslow please. Are you able to pass this on and provide a response?

In their initial letter to the Mayor there was no intended implementation date. In their most recent correspondence they refer to September, given the anticipated impact on traffic levels and pressure on parking coming out of lockdown. I appreciate there has been many months and changing situations with Covid-19 in between that letter and now given there was some delay in receiving this. **Please could the borough confirm if they have a new implementation date in mind and provide a brief explanation for this?**

We'll start processing the necessary materials for this pending that follow up, as we can reflect in the materials once received.

Thanks

[REDACTED]

From: [REDACTED] <[REDACTED]@londoncouncils.gov.uk>
Sent: 02 November 2020 16:36
To: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@londoncouncils.gov.uk>
Subject: RE: Response from Ealing and Hounslow re Band Change Request

Thanks [REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 02 November 2020 16:29
To: [REDACTED] <[REDACTED]@londoncouncils.gov.uk>; Tim Steer <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@londoncouncils.gov.uk>
Subject: RE: Response from Ealing and Hounslow re Band Change Request

Great, thank you for confirming. Appreciate it's challenging for the boroughs, but helpful for them to understand our need to resource this end and process properly.

I'll be in touch ASAP with an update.

[REDACTED]

From: [REDACTED]@londoncouncils.gov.uk>
Sent: 02 November 2020 16:28
To: [REDACTED]@london.gov.uk>; Tim Steer [REDACTED]@london.gov.uk>
Cc: [REDACTED]@londoncouncils.gov.uk>
Subject: RE: Response from Ealing and Hounslow re Band Change Request

Hi [REDACTED]

No worries and thanks

Yes they are aware of this. They initially sent the details over to us in July and we had assumed that they had responded directly to yourselves and only sent us a copy for our records. It would appear that we had our wires crossed and they had expected us to send it to you, hence the September commencement date (which was a tad ambitious any way!).

We have explained the situation and the fact that this can take time to fully review the application.

Many thanks

[REDACTED]

From: [REDACTED]@london.gov.uk>
Sent: 02 November 2020 15:52
To: [REDACTED]@londoncouncils.gov.uk>; [REDACTED]@london.gov.uk>
Cc: [REDACTED]@londoncouncils.gov.uk>
Subject: RE: Response from Ealing and Hounslow re Band Change Request

Hi [REDACTED]

Thanks for sending over, I'm looking over these applications for the team. We will need to look over this and I'll get back to you on next steps once we've had a chance to review.

I see the attached references both boroughs wanting to put this in place from September. Clearly that's not possible now; are the boroughs aware we have only just received this information? I'd also suggest managing expectations regarding the process for these applications given our need to formally review information, prepare reports to the Mayor if appropriate and then the statutory timelines re SOS notification and notification to residents.

Thanks,

[REDACTED]

From: [REDACTED]@londoncouncils.gov.uk>
Sent: 02 November 2020 11:02
To: [REDACTED]@london.gov.uk>
Cc: [REDACTED]@londoncouncils.gov.uk>
Subject: Response from Ealing and Hounslow re Band Change Request

Good morning

Please see the attached response from Ealing and Hounslow responding the questions that the GLA had regarding their band change requests.

Apologies for the delay in forwarding this, I had assumed that the boroughs had responded directly but unfortunately they had not.

Many thanks



[\[redacted\]@londoncouncils.gov.uk](mailto: [redacted]@londoncouncils.gov.uk)

London Councils
59½ Southwark Street
London SE1 0AL
Mobile Number: 07702 339171

www.londoncouncils.gov.uk

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Appendix 1: Consultation materials & detailed summary of objections received, with officer response.

The majority of respondents provided their comments via a survey on the council's online consultation hub. The consultation landing page outlined the reasons for the proposed changes and included links to supporting documents.

Parking Ticket Charges - Proposed Increase

Overview

London has two charging levels for Parking Penalty Charge Notices (PCNs), often known as parking tickets. Hounslow is a Band B borough except for the Twickenham Stadium Event scheme, which already operates at the higher Band A level. We now propose applying to become a Band A borough to help improve the level of compliance with parking restrictions.

Within each band, there is a further Higher / Lower charging split according to the severity of offence, as shown in the table below. A 50% discount applies for early (i.e. within 14 days) payments. These amounts are as shown in brackets.

Band	Higher (Discounted)	Lower (Discounted)
A	£130 (£65)	£80 (£40)
B	£110 (£55)	£60 (£30)

In real terms, this means a PCN issued for overstaying in a car park in our borough can be settled at £30, while one issued for parking in a disabled bay can be settled at £55. Our proposal would see a £10 increase in both cases.

Why We Are Consulting

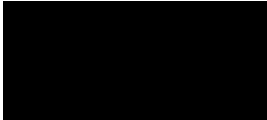
The number of PCNs issued in our borough has grown by 39% since 2015. This includes large increases in categories of particular concern to the council (see table in the "Related" section below), such as footway parking contraventions, which greatly impact those with wheelchairs and pushchairs. While part of this increase may be attributed to new restrictions (e.g. more disabled bays) and improved detection by the enforcement team, that does not account for such significant growth. The decreased deterrent of the charges, which have not been reviewed since 2011, is believed by the council to be a major factor.

The aim of a well-functioning parking operation is high compliance, achieved with clear and appropriate restrictions, supported by robust and fair enforcement. The council believes an increase in the penalty amount will improve PCNs' deterrent effect, resulting in higher compliance and reducing the number of PCNs issued.

Other boroughs such as Barnet, Brent, and Ealing are also considering re-banding. A map in the "Related" section shows the current council bands.

This consultation is to gather your views to inform any application we make to The Secretary of State to become a Band A borough for parking offences.

Closed 28 Jan 2020
Opened 13 Dec 2019

Contact


Links to Supporting Documents

Related

 [PCN Increase Data 2015-19](#)
8.7 KB (PNG image)

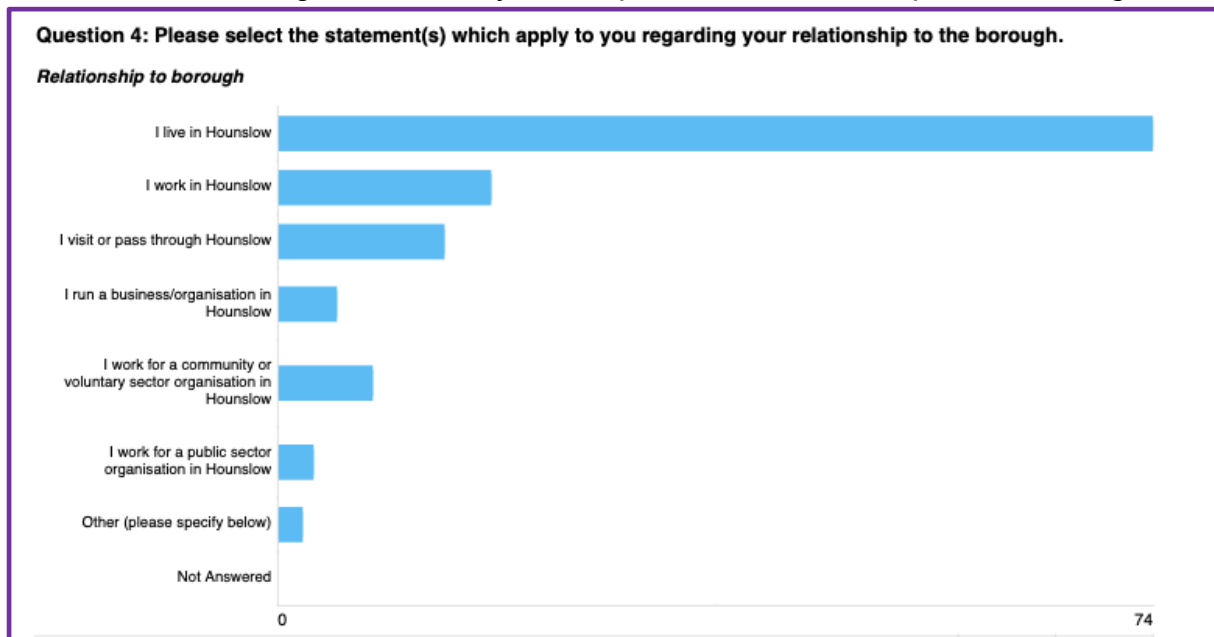
 [Parking Band Map](#)

 [Legal - The section of the Traffic Management Act that relates to setting parking charges](#)

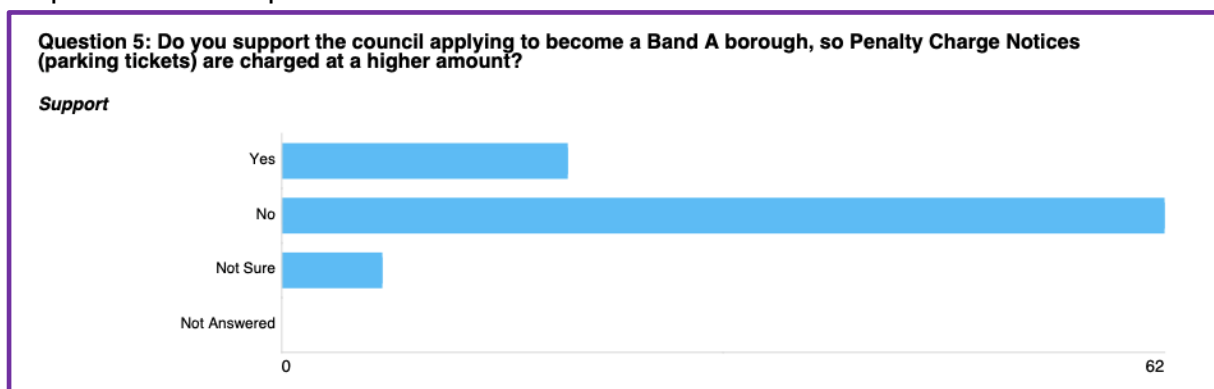
Respondents were then asked to provide their personal details in Questions 1-3

- Question 1 – What is your name
- Question 2 – What is your email address
- Question 3 – What is your postcode

Question 4 was designed to identify the respondent’s relationship to the borough.



Question 5 addressed the core purpose of the consultation and was designed to solicit respondents’ support or objection to the proposal. There was a total of 89 responses to this question.



Option	Total	Percent
Yes	20	22.47%
No	62	69.66%
Not Sure	7	7.87%
Not Answered	0	0%

Of the 89 respondents who answered Question 5, 75 provided detailed comments (Question 6).

The council does not provide personalised responses for substantial consultations like this one, but they have all been carefully read and considered by council officers, including additional comments received via email outside of the consultation portal.

The below table is a summary of objections received. These have been grouped into themes, with sample comments in italics. The officer responses to the objections are provided in the table's second column, alongside their respective objection themes.

Objection Theme	Officer Response
<p>Alternative Approach More Effective: Three comments received in this general category included the following points;</p> <p><i>Tickets are not currently given as per the defined higher and lower levels, e.g. one tyre outside a resident parking bay given high ticket. Correcting this would give more validity and legitimacy to ticketing and lead to more respect for parking rules.</i></p> <p><i>It would be far better to bring in council employed people not contract this out where profit is the main goal.</i></p> <p><i>Teach people, be proactive in how you deal with parking problems and don't forget the little areas, maybe employ more enforcement officers.</i></p> <p><i>Also I would like to see where there is free parking for 30 minutes that if you have a Hounslow parking permit badge this would be enough rather than having to get a ticket or register on the app</i></p> <p><i>Instead of increasing the charge, the council should educate drivers about parking restrictions. This would be much more effective way of tackling the issue.</i></p>	<p>The council, in conjunction with its enforcement contractor, continually reviews deployment levels and approaches to enforcement. Despite this proactive approach, levels are showing a year on year increase.</p> <p>Civil Enforcement Officers offer information and guidance when appropriate, but in most cases, they do not interact with the driver.</p> <p>The council is not in a position to carry out a widespread driver education programme (over and above regular features in our borough wide magazine, HM) regarding standard parking contraventions, and therefore targets its resources at less well-understood parking initiatives, such as to help prevent residents receiving PCNs on our growing number of "School Streets" schemes.</p> <p>Notwithstanding the above statement, officers will review the council website's parking information pages to see if any further improvements can be made.</p>
Objection Theme	Officer Response
<p>Financial Motivation / Charges Too High</p>	<p>It is important to understand that this proposal only affects motorists who park illegally and</p>

34 comments received in this general category included the following points;

While in theory, it is a good idea as the idea is to frighten people with higher fines, in reality, all that will happen is more money going into Hounslow council's coffers.

I think this borough has very high parking charges

You get enough money out of us

NO ! NO ! NO !

It's already a 'Money grabbing' business . It often penalises those lower paid workers who live in an area where for some reason , there is a parking restriction of 9-6 , 7 days a week !!!!

I believe it's simply camouflage for the council to treat PCNs as an income stream.

Stop stealing money from driver by issuing PCN

PCN's are already incredibly costly and receiving even a very occasional one is a considerable, unexpected expense.

Nothing to do with restrictions. It's all about making money for the council. There other means that would work better.

In times of financial hardship i feel that drivers are always hit the hardest.

Stop making money from charging drivers and start to tackle more pressing issues like the way u design roads which divert and increase traffic contributing to pollution. Concentrate on making parks safer so the youth can play sports instead of turning to a life of crime.

therefore does not impact the vast majority of motorists in the borough.

Officers do not intend or expect this proposal to raise additional funds in the medium term. It is anticipated to be revenue-neutral, as we anticipate fewer PCNs to be issued due to the increased deterrent effect of the higher charge.

This increased deterrent should lead to higher compliance, which in turn benefits other motorists and public transport users, as the road network functions more effectively.

Any surplus revenue raised through the issuance of PCNs is ringfenced for reinvestment into transport activities/projects, as stipulated by the Traffic Management Act.

Objection Theme	Officer Response
Negative Impact on Local Businesses	

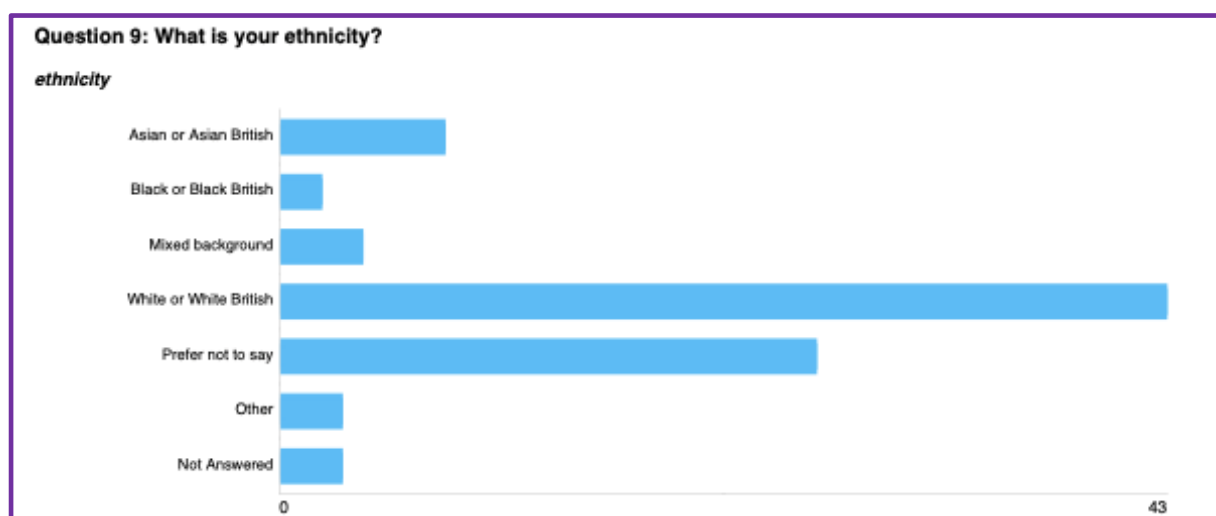
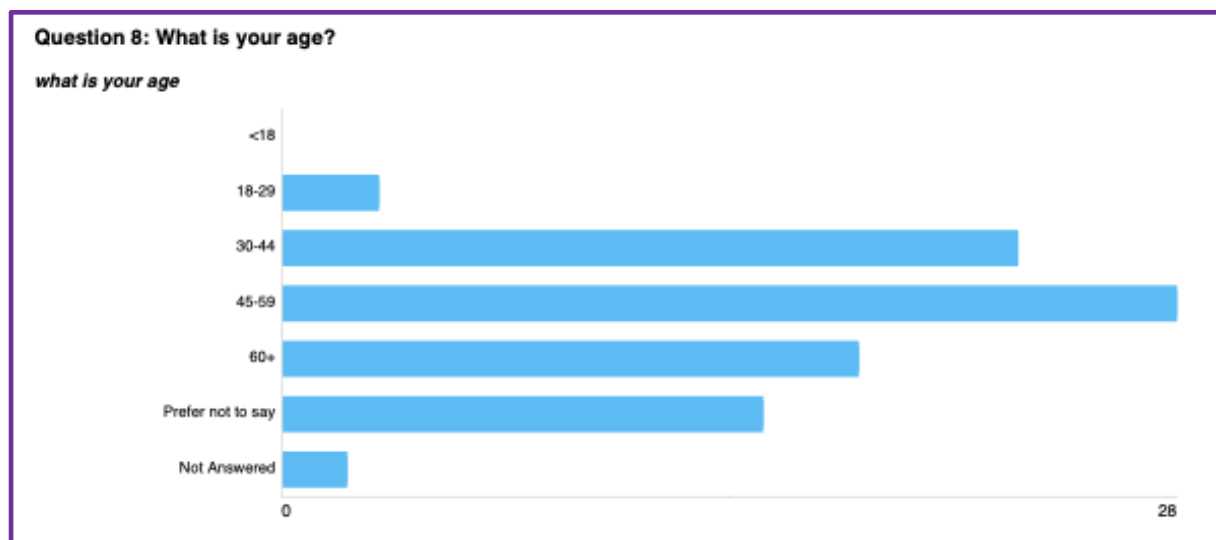
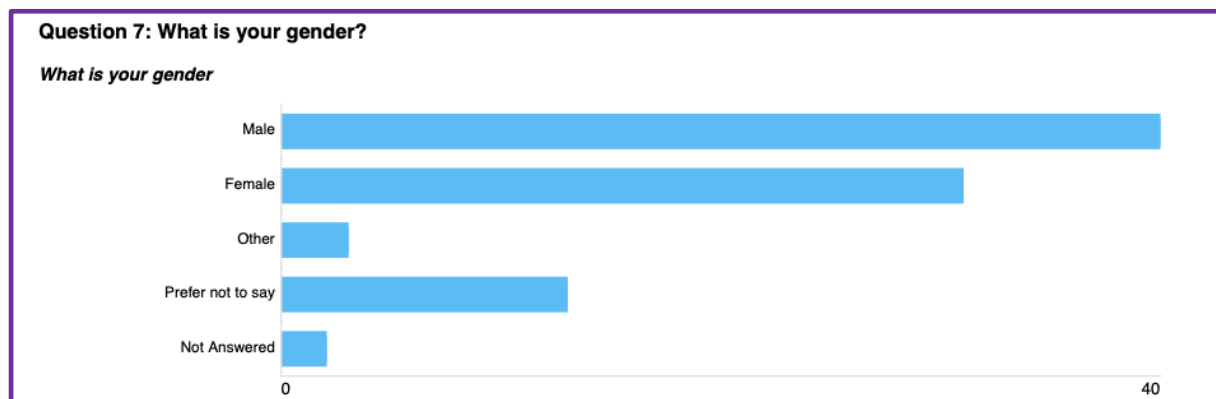
<p>Three comments received in this general category included the following points;</p> <p><i>its too high as it is and signages are not good enough. its also ruining local trades and sending people out to retail centres.</i></p> <p><i>Hounslow town centre is not a place that people wish to visit as it is dirty and has lots of men sitting outside coffee shops. It is a shopping area that has a lot of crime I have had my purse stolen and my daughter has had hers stolen along with her shopping.</i></p> <p><i>If parking was made cheaper maybe it would encourage more shoppers. The charges in the few car parking areas are very expensive and if fines are increased for overstaying fewer people would come.</i></p> <p><i>Making this more expensive often defeats the object of the exercise. Hounslow is run down and not a nice place to be. I feel unsafe when I visit, I use the buses and waiting in the dark at bustops can feel scary</i></p> <p><i>Hounslow High Street is not as good with business close etc and you what to take more money from then area people will just stop coming you no the answer isn't just charge more you no</i></p>	<p>As stated in the previous section, it is important to understand that this proposal only affects motorists who park illegally and therefore, does not impact the vast majority of motorists in the borough.</p> <p>This proposal only affects PCNs. It does not relate to the cost of Pay & Display parking, Parking Permits or Council Car Parks.</p> <p>It is widely accepted that an effective enforcement regime has considerable benefits for retail and commerce. Effective enforcement ensures valuable parking space is not abused and increases space availability. The council considers any site-specific parking proposals from local businesses. However, the goal must always be to implement the right scheme in accordance with the council's transport objectives and consultation with local stakeholders, and then to strive to ensure that it is adequately enforced.</p>
<p>Objection Theme</p>	<p>Officer Response</p>
<p>Not Enough Parking Available</p> <p>Four comments received in this general category included the following points;</p> <p><i>There are simply too many Controlled Parking Zones in Hounslow - there is almost nowhere to park on weekdays during working hours.</i></p> <p><i>You need to increase parking spaces before you increase parking penalties.</i></p> <p><i>If there is an increase in inappropriate parking it suggests a need to adequately provide parking spaces to enable people to access local shops and businesses (not for leaving cars to take transport to other parts of London).</i></p> <p><i>I would like to see if the council has any under-utilised land areas that could be used for this, and for the council to ensure spaces such as Sainsburys car park are not built over, which would further worsen the problem.</i></p>	<p>While we are sympathetic to these comments, the reality is that the demand in town centres within the borough – and indeed, across London, outstrips availability.</p> <p>A growing local population places increasing pressure on kerbside and off-street parking space available, especially in consideration of the significant proportion of residents who do not own a car and who rely on alternative travel modes to move around the borough.</p> <p>There is thus little prospect of our increasing the parking stock in these areas of demand significantly, however where feasible we are exploring targeted opportunities to bring school car parks into use by the public at weekends commencing with Kingsley Academy in 2020.</p>

there should be other ways to tackle the parking issue in the area by creating a car park instead of removing them

Objection Theme	Officer Response
<p>Not Fair to Elderly / Disabled 2 comments received in this general category included the following points;</p> <p><i>As a disabled person who has had to pay fines for mistakenly parking, for example on a non loading/unloading roadside, I am disgusted that a PCN was issued and resulted in my paying a fine of 60 pounds, nearly a weeks money from my disability allowance.</i></p> <p><i>Wouldn't it be better to be more helpful to others also who mistakenly park by offering a warning first and then perhaps a heavier fine for a second offence and heavier still for repeated offences.</i></p> <p><i>I do not support the increase, the charge is significantly high already and equivalent to a days pay.</i></p>	<p>Disabled drivers receive parking concessions through the Blue Badge scheme, which effectively exempts them from casual parking charges, as well as providing time-limited parking on yellow lines (waiting restrictions).</p> <p>In addition, the council developed a borough-wide scheme for residents to apply for personalised disabled bays, and it has implemented parking schemes designed to reduce barriers to the disabled community – for example, by introducing free permits for disabled children's parents to park at play centres where charges have been introduced. Beyond such concessions, however, those with disabilities are required to comply with traffic and parking regulations fully. As stated in the consultation, non-compliance such as footway parking has a significant negative impact on those with visual and mobility impairments if it is not robustly enforced.</p> <p>Unfortunately, there is no scope within current parking legislation for the council to give escalating penalty charges for repeat offences.</p>

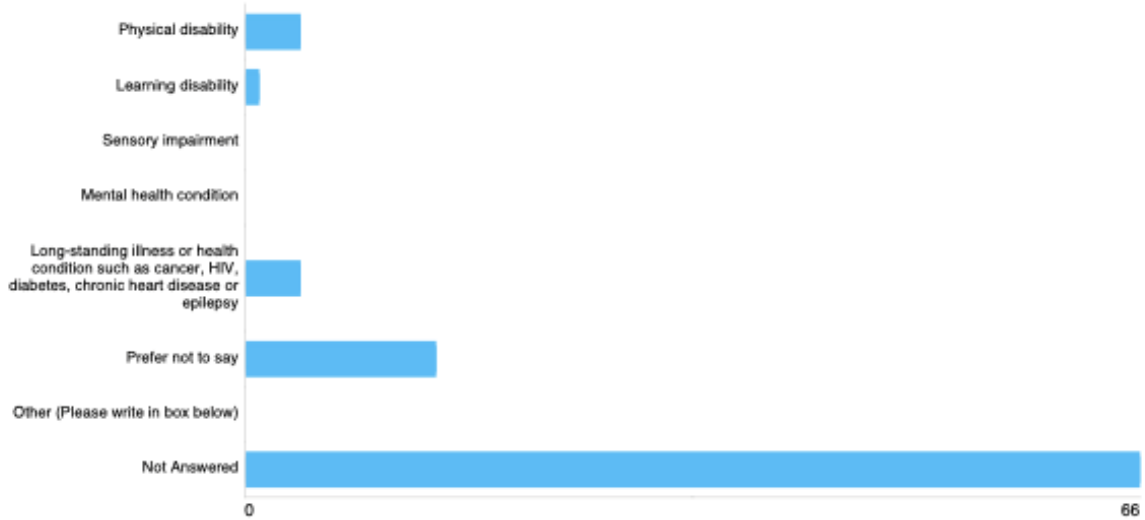
Objection Theme	Officer Response
<p>Proposal Won't be Effective</p> <p>Three comments received in this general category included;</p> <p><i>People commit these parking offences not because its a cheap fine, its because there are poor signage and unless you have read the highway code you will not be ofay with what yellow lines mean</i></p> <p><i>Because increasing tickets price is not the solution here</i></p> <p><i>Its not a thought out proposal</i></p>	<p>The obvious alternative to the proposal aside from those previously discussed in the first section of this table would be to do nothing, thereby maintaining the status quo.</p> <p>However, that course of action is unlikely to see offending rates decrease. In fact, it would be reasonable to expect non-compliance levels to accelerate considering recent trends.</p> <p>Furthermore, the government's Secretary of State places requirements on local councils in respect to their parking operations, including that councils should increase compliance through a system that is fair to the motorist but also effective in enforcing parking regulations.</p> <p>Doing nothing would be incompatible with this requirement based on recent trends.</p>

Additional questions 7 - 11 gathered further general information about respondents



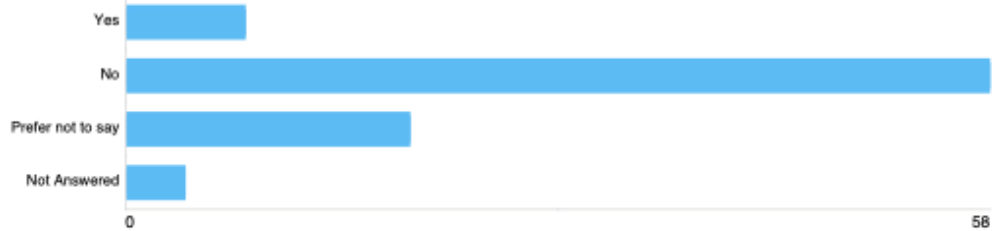
Question 11: If your answer to the previous question was yes, please indicate the type of disability which applies to you. People may experience more than one type of disability, in which case tick all types that apply. If your disability does not fit any of these types, please specify 'other'.

type of disability



Question 10: Do you consider yourself to have a disability?

Disability



Three additional consultation responses were received by email. These emails contained some points that are captured in the consultation summary table above, but included additional noteworthy points as follows:

1/ Cut off point for historical data

The historical cut-off point for comparison was questioned, specifically that parking contraventions immediately before the cut-off point had been higher, and therefore the more recent past years represented a recovering dip rather than real growth in contraventions.

Officers examined this point but noted that the observed “dip” in contraventions coincided with the operational introduction of revising legislation, which had the effect of banning CCTV enforcement of many contraventions and introducing extended observation periods for some offences.

These measures effectively combined to “reset” the number of PCNs issued by local authorities across London, and the cut-off point included with the consultation was therefore considered optimal for respondents to compare data and observe trends.

2/ Clarity of Signs / Lines

The clarity of signs/lines was raised in the context of motorists not always understanding the regulations or what they were meant to do, which in turn can lead to the issuance of a PCN.

Officers reviewed this point, but note that the format, type and content of parking and traffic signs are regulated by the Department of Transport through a manual known as *The Traffic Signs Regulations and General Directions* (often referred to as TSRGD). All authorities are obliged to follow this manual, and non-compliance raises separate issues in terms of legality and enforceability of regulations.

All government publications (such as the highway code) reference the same standards as set out by TSRGD. The standards were last revised in 2016, and the council's Traffic Officers and Engineers regularly receive training and briefings in terms of best practice and compliance with the TSRGD.

Notwithstanding the above, as indicated within the formal consultation feedback, officers will review the councils' website content to see if there is any additional content that could be made available that might assist motorists in further understanding the regulations.

3/ Positive implications for cyclists

An additional response was received from Hounslow Cycling, who strongly support the proposed adoption of Band A parking charges. Their response cited the dangers that illegal parking causes to cyclists, and they also called for increased enforcement activity to help combat this.

From: Claire Hamilton [REDACTED]
Sent: 17 November 2020 12:15
To: [REDACTED] Tim Steer <>
Cc: [REDACTED]
Subject: RE: Response from Ealing and Hounslow re Band Change Request

[REDACTED],

Having now reviewed the additional and previous information from Hounslow, I have the same follow up to request from Hounslow please. Are you able to pass this on and provide a response?

In their initial letter to the Mayor there was no intended implementation date. In their most recent correspondence they refer to September, given the anticipated impact on traffic levels and pressure on parking coming out of lockdown. I appreciate there has been many months and changing situations with Covid-19 in between that letter and now given there was some delay in receiving this. Please could the borough confirm if they have a new implementation date in mind and provide a brief explanation for this?

We'll start processing the necessary materials for this pending that follow up, as we can reflect in the materials once received.

Thanks

[REDACTED]

From: [REDACTED]
Sent: 19 November 2020 15:59
To: [REDACTED] Tim Steer <>
Cc: [REDACTED] Mark Frost <>
Subject: Re: Response from Ealing and Hounslow re Band Change Request

Hi [REDACTED]

Further to your request for clarification on our proposed implementation date The London Borough of Hounslow are now proposing 1 April 2021. Hopefully, this will allow sufficient time for our application to be considered.

If approved, it would also allow sufficient time to publicise both the move to Band A and the rationale behind it. If this change is to have the desired effect in deterring motorist contravening, then it is imperative that this message is put out. This date would also allow time for any system changes to be made.

Please do not hesitate contacting me if you need any further information.

Regards

[REDACTED]
Transport, Parking and Environmental Strategy
Office: [REDACTED]