

## **DECISION AUDIT FORM**

For use by Head of Parking and Markets in Exercising (NH338 and NH339) or delegated powers - (Protocol for Officer Delegation)

### **NEIGHBOURHOOD AND HOUSING DIRECTORATE – PARKING OPERATIONS TEAM**

**DECISION:** - Proceed with the making of the proposal to relocate Ickburgh Road from Parking Zone R into Parking Zone S.

**Agree to:-**

- Overrule the objections received and proceed with the making of traffic proposals to approve the boundary amendment for Zone R and Zone S, with the effect of relocating the entire length of Ickburgh Road into Zone S, adopting the current operational hours Monday to Saturday 8.30am to 6.30pm.

**Reasons;**

- 1 Parking Services carried out its duties to consult and introduce parking controls in Parking Zone R in line with the Parking Enforcement Plan (PEP) 2015 - 2020.
- 2 The Zone R Review public consultation is part of the review of parking zones as outlined in the Parking Enforcement Plan (PEP) 2015 - 2020
- 3 The proposal to relocate Ickburgh Road from Zone R to Zone S was based on two main reasons;
  - Feedback received from the Stage 4 review consultation carried out in the area between 29th October 2018 and 10th December 2018.
  - To protect the parking needs of the residents on Ickburgh Road from high parking stress caused by commuter parking and displacement parking from nearby parking zone S.

## Consultation process

### Zone R and R displacement

- 4 Parking Services consulted residents in the zone R area between 2015 - 2016, in line with parking policies and the Council's Consultation Charter.
- 5 A stage one consultation was initially carried out in Zone R in 2015 to gauge support for parking controls in the area. A stage 2 "detailed design" consultation followed in 2016 following the Stage 1 consultation which was approved by Cabinet on the 22nd June 2015. See delegated report for more information: [https://consultation.hackney.gov.uk/parking-services/zone-r-rectory-road/supporting\\_documents/CDM17443718v1Stage\\_Two\\_consultation\\_delegated\\_report\\_Zone\\_R\\_S\\_Displacement\\_and\\_N\\_Displacement\\_2016.pdf](https://consultation.hackney.gov.uk/parking-services/zone-r-rectory-road/supporting_documents/CDM17443718v1Stage_Two_consultation_delegated_report_Zone_R_S_Displacement_and_N_Displacement_2016.pdf)
- 6 Following this, requests were received from residents within nearby uncontrolled roads for parking controls to be introduced and as a result a consultation was carried out in this area on the introduction of parking controls
- 7 Although there was no overall majority support from the area, when the feedback was analysed on a street by street basis, the majority of roads in the Zone R displacement area were in support of parking controls if controls were introduced on nearby roads.
- 8 Although Ickburgh Road was not in favour of parking controls, this street was included in the Zone R boundary to ensure that residents and businesses were protected from undue parking pressure from nearby roads and other parking zones once controls were introduced in the area.
- 9 The inclusion of Ickburgh Road in Zone R allowed the Council to also create a logical boundary for Zone R. Further details of the consultation can be found in the delegated report: [https://consultation.hackney.gov.uk/parking-services/zone-n-disp/supporting\\_documents/Stage\\_12\\_Delegated\\_Authority\\_Report\\_Zones\\_R\\_S\\_and\\_N\\_disp\\_areas\\_Jan\\_2017.pdf](https://consultation.hackney.gov.uk/parking-services/zone-n-disp/supporting_documents/Stage_12_Delegated_Authority_Report_Zones_R_S_and_N_disp_areas_Jan_2017.pdf)

10 In line with the Council's Parking Policy (PEP 2015 – 2020), displacement areas joining existing parking zones adopt the same hours of operation as the parking zone they are joining. The hours of operation in Zone R is Monday to Friday 7am to 11am.

#### Zone R Review

11 Parking Services carried out a Stage 4 Review consultation between 29th October 2018 and 10th December 2018 in Parking Zone R. This public consultation was part of the one year review of new parking zones as outlined in the Parking Enforcement Plan (PEP) 2015-20.

12 The Review consultation allowed residents and businesses the opportunity to provide feedback on the operational hours of the parking zone, proposed boundary change for the zone and the current parking design.

13 All consultation documents can be viewed on the Council's website: <https://consultation.hackney.gov.uk/parking-services/zone-r-parking-review/>

14 The consultation documents were sent to all residents and businesses within Zone R and provided information about why the Council consulted the area, information about the proposed design and the hours of operation.

15 The consultation feedback on the hours of operation showed support for the existing hours of operation (79%) and as a result the recommendation was made by Parking Services to retain the existing operational hours of Monday to Friday 7am to 11am in Zone R.

16 During the initial implementation stage of Zone R, Parking Services received feedback from some roads regarding the hours of operation and requests for their roads to be relocated into zone S. Based on this, Parking Services included this in the review consultation and proposed to relocate Benthal Road (between Evering Road and Ottaway Street), Brooke Road (between Evering Road and Rendlesham Road), Dunnock Mews, Ickburgh Road, Maury Road (between Evering Road and Rendlesham Road), Ottaway Street, Rendlesham Road and Stellman Close into nearby zone S which has longer hours of operation.

- 17 Whilst the majority of roads firmly opposed the boundary change, feedback received from Ickburgh Road showed a 59% support for the boundary change.
- 18 The roads within the proposed boundary change were also asked if they would support the relocation to Zone S if there was majority support for extending the operational hours in Zone R. Ickburgh Road had an overwhelming 84% support for the relocation to parking zone S, whilst the remaining roads opposed the boundary change once again.
- 19 Based on the feedback received, the Council made the recommendation to relocate Ickburgh Road to parking zone S. This change would mean that Ickburgh Road would adopt the same operational hours as Zone S which is Monday to Saturday 8.30am to 6.30pm.

### Policy considerations

- 20 The Parking and Enforcement Plan (PEP) 2015-2020 outlines all parking related policies and procedures including parking zones, enforcement and the hierarchy of need which was last consulted on in 2015.
- 21 There is greater demand for parking than space available, so the Council uses the hierarchy of parking need which shows the general priorities across Hackney to determine parking need.

Priority	Road user
1	• blue badge holders' parking
2	• residents' parking
3	• car clubs
4	• local business / service operational parking / servicing
5	• short-stay shopper / visitor parking
Other factors affecting priority include	<ul style="list-style-type: none"> <li>• impact on traffic flow / road safety</li> <li>• impact on air quality / climate change</li> <li>• size of vehicle / effect on local environment</li> </ul>

- 22 Reviewed every five-years, the PEP allows all residents, local businesses and visitors to the borough to provide feedback on proposed policies as well as

provide general feedback on how the council can improve the PEP. A review of the PEP is planned to commence in 2019.

23 The Council recognises that loneliness affects our residents, especially those who are vulnerable, elderly and disabled. The Council's Parking and Markets Service offer a 50% discount to residents who are disabled and/or aged 60 and over. Residents can purchase one day or two hour visitor vouchers books or on street parking and one day estate vouchers for off street parking on estates. Both allow residents visitors to park in their home parking zone.

24 The Parking and Enforcement Plan (PEP) 2015-2020 is clear on how the hours of control should be prioritised to reflect the characteristics of the area and protect local parking needs. Section 2.30 goes on to provide two examples, please see below an extract from the PEP:

*'Extending controls until the evening may be suitable for areas with a night-time economy. The event-day parking scheme increases the hours of control on the days of football matches and other events at Arsenal Football Club's stadium in Islington.'*

#### **Consultation Feedback**

25 In line with our policies, the consultation feedback was analysed on a street by street basis.

26 The consultation included all roads in the area whether private or public.

27 The feedback received from the majority of roads within the area showed support for retaining the current hours of operation, Monday to Friday 7am to 11am.

28 Parking Services proposed a boundary change for roads close to the boundary of Zone S which has longer hours of operation; Benthall Road (between Evering Road and Ottaway Street), Brooke Road (between Evering Road and Rendlesham Road), Dunnock Mews, Ickburgh Road, Maury Road (between Evering Road and Rendlesham Road), Ottaway Street, Rendlesham Road and Stellman Close. The majority of roads opposed the boundary change, however when analysed on a street by street basis feedback from Ickburgh Road (59%) supported a boundary change.

29 Ickburgh Road is close to the boundary of Zone S and suffers from parking pressure due to displacement parking from motorists moving their vehicles from Zone S to Zone R to avoid the longer hours of operation within Zone S and the risk of receiving Penalty Charge Notices.

30 When asked if the roads within the proposed boundary change would support the relocation to Zone S if there was majority support for extending the operational hours of Zone R, all roads opposed the boundary change except Ickburgh Road where the support for the boundary change increased to 84%. See delegated report for more information:

<https://consultation.hackney.gov.uk/parking-services/zone-r-parking-review/results/zonerreviewdelegatedreport-signed.pdf>

31 The Council's consultation process is not a referendum. It takes into account the needs of those who are experiencing parking difficulties and looks at ways to resolve their parking concerns by providing a logical solution. As Ickburgh Road is close to the boundary with parking Zone S, the Council is able to create a logical boundary by relocating only Ickburgh Road to Zone S.

#### **Traffic Order process**

32 The traffic order proposals were advertised on the 13th May 2018. During this time members of the public were able to comment or object to the proposed scheme.

33 The process includes advertising the traffic order in the local newspaper (Hackney Today) on the same day.

34 In addition, site notices were displayed on lamp columns in each street affected by the proposed changes to make all residents and other members of the public aware of the Council's proposals.

35 The date when the traffic order was advertised was also included in the summary leaflet sent to all addresses in the area.

36 The summary leaflets were sent out to residents on the 10th May 2018 via second class post.

- 37 The closing date for the statutory consultation was 3rd June 2019. This information was provided on all notices displayed in the area.
- 38 Members of the public were able to provide their feedback to the statutory consultation through various channels. This included the Council's online traffic order consultation webpage, in writing to the Head of Streetscene (quoted on the notices) or by email to the email address quoted on the notices or on the summary leaflet sent to residents.
- 39 Information regarding how to object to the Council's proposals was provided on posters displayed in all roads in the area and in the summary leaflets sent out to all residents and businesses.

### **Car Free Developments**

- 40 The Section 106 agreement has been agreed under the Town and Country Planning Act 1990.
- 41 Occupiers of residential developments subject to Car-Free Development Agreements made under Section 106 of the Town and Country Planning Act 1990 are legally not permitted to apply for any type of on-street parking permits unless they hold a blue badge. As a result, Parking Services cannot issue permits to car free developments.
- 42 Residents in car free developments however have other parking options available to them including purchasing visitor vouchers, renting a garage from the Council or parking outside of a controlled parking zone (CPZ).

### **Permit Prices**

- 43 The price of permits were communicated to residents and businesses in the consultation booklets sent out to the residents.

- 44 Hackney Council promotes the greenest methods of travel such as walking, cycling and public transport over private car use plus the shift from petrol / diesel vehicles to electric vehicles with help to improve air quality.
- 45 Every London borough has different priorities and challenges when it comes to offering parking services. For example Islington Council has a resident roamer scheme from 11am to 3pm daily, however their one day visitor vouchers cost £14.80 compared to £3.50 in Hackney.

### **Parking Income**

46 Councils cannot use parking as a revenue-generating tool. The statutory guidance states that councils should not set targets based on revenue, the number of PCNs issued or the number of vehicles removed. The use of any surplus that results from parking is strictly governed by legislation and is tightly controlled. This money can only be used for activities specified in Section 55 of the Road Traffic Regulation Act 1984 (as amended). These activities include:

- public realm improvements
- road safety initiatives
- freedom passes for disabled people and people over 60

The Council does not collect or share information on people who receive a penalty charge notice in order to maintain data protection protocols.

- 47 All Council voucher types are already separated into residential, estates, all zone business voucher and health and social care vouchers. The Council's parking and Markets Service do not collect additional information on residents, local businesses or visitors to the borough who may use pay and display for data protection reasons.
- 48 Carrying out a borough-wide survey every year to obtain this information is not the best use of public resources. As above, the Council cannot use parking as a revenue-generating tool.

### **Background**



- 49 Following the approval to implement parking controls in the Zone R area in 2016, Parking Services carried out a public consultation as part of the one year review of new parking zones as outlined in the Parking Enforcement Plan (PEP) 2015-20.
- 50 The review of Zone R, allowed all residents and businesses in the area to comment on the hours of operation and the design of their zone.
- 51 During the implementation of Zone R, Parking Services received feedback from some roads regarding the hours of operation and requests for their roads to be relocated into Zone S. For this reason, a boundary change was also proposed as part of the review.
- 52 To ensure the feedback for the boundary change followed a fair process, parking services only analysed feedback received from the roads directly affected by the proposed change. This ensured that the right decision is made for those residents living on the roads impacted.
- 53 Approval to retain the existing operational hours of Monday to Friday 7am to 11am in Zone R and implement the proposed boundary change of Ickburgh Road from Zone R to Zone S was granted through delegated powers by the Corporate Director on the 15th March 2018. See a copy of the delegated report for more information;  
<https://consultation.hackney.gov.uk/parking-services/zone-r-parking-review/results/zonerreviewdelegatedreport-signed.pdf>
- 54 The statutory consultation process to approve the boundary change for Ickburgh Road commenced on 13th May 2018, with a 4 week objection period ending on the 3rd June 2018.
- 55 The notice was advertised in the local newspaper (Hackney Today). In addition, site notices were displayed on each street affected by the proposed changes.
- 56 A number of objections against the proposed Traffic Management Order proposals were received from residents who lived within the parking zone R area.

57 The majority of the objections were against the proposal to relocate Ickburgh Road to parking zone S and the extension of the hours of operation.

58 This report provides a background of the actions taken by the Council and outlines the objections raised with officers' recommendations.

**Comments against TMO and Officer's response:**

59 A summary of the objections received and officers' recommendations are provided below. Appendix 1 contains copies of all emails and correspondence received against the TMO notice issued on 13th May 2018.

60 A number of objections were received from residents who lived within Parking Zone R area.

61 The majority of the objections were against the proposed hours of operation being extended in Ickburgh Road. Specifically the objections were based on the negative effect this change will have on the local residents' needing regular visits from healthcare practitioners, those who visit for personal and social care reasons and local tradesmen. Objections were also based on not receiving the consultation documents and the consultation documents lacking in clarity and this leading to a low response rate to the consultation.

62 A number of objections with similar reasons were submitted from the area. Those objections which raised similar issues have been grouped together and a response provided accordingly.

63 The objections raised in relation to these proposals have been considered and have been overruled. The reason for this has been explained in the conclusion section of this report. Please see appendix 1 for detailed objections received.

## Summary of Objections

### Objections

#### Received from:



The residents objected to the below;

- 64 There is no justification for extending the existing operational hours which are perfectly adequate;
- 65 The consultation outcome document states that 79% of the people consulted are in favour of retaining the existing system.
- 66 The consultation document does not state that decisions on parking controls will be made on a street by street basis and also when the current system was introduced, it was done so on the basis of everyone consulted - not on a street by street basis. The basis for the decision to extend the current hours is therefore arbitrary and inconsistent.
- 67 The extension of the hours will cause significant economic hardship to all users, but particularly to those of us who need to have regular visits from healthcare practitioners e.g. physiotherapists and chiropractors and also those who visit for

personal and social care reasons. The proposal therefore discriminates against the elderly, disabled and infirm.

- 68 The consultation documents were muddled and lacking in clarity. They believe that this is the reason for the poor response rate (the response rate to the initial consultation were far higher) and residents did not understand the implications of the proposal.
- 69 Some of the residents did not receive the consultation documents.
- 70 The residents of Zone R were not given the same consideration as the residents in Stamford Hill West, Springfield as in a recent parking consultation of residents in Stamford Hill West, Springfield, the Council gave residents nine weeks to respond in contrast to the six weeks allowed to Ickburgh residents. When the objector queried this, the Council informed that this was due to "religious holidays" of certain residents had been taken into consideration. A number of households in Ickburgh Road consists of people originating from the Indian subcontinent who celebrate the festival of Diwali. They were unaware that the religious holiday of Diwali could be a reason for extending the consultation period.
- 71 In 2018 preparations for Diwali began in advance of the opening of celebrations on 6th November and continued until 10 November. Celebrants of Diwali were thus disadvantaged in comparison to other religious groups e.g. consultees in the recent Stamford Hill West, Springfield consultation.
- 72 A number of Ickburgh residents misunderstood or were confused by the Consultation document.
- 73 It was possible on a quick perusal of the consultation document to interpret from the roads listed under the proposed boundary change that it was areas of Council housing that were being consulted, as streets in Landfield Estate, parts of Nightingale Estate, Benthall Court and Council properties in Maury Road were listed. Ickburgh Estate lies at the end of Ickburgh Road and therefore this was a perfectly reasonable if mistaken conclusion. In addition, the map referred to in Question 2 of the Consultation document headed "Zone S - Boundary Relocation Map" did not indicate Ickburgh Road, Stellman Close, Ottaway Street, Dunnock Mews or Benthall Road at all and thus provided inadequate information for those who consulted the map for guidance.
- 74 Many residents could not understand why the Council should have come to the conclusion that Ickburgh Road formed a "logical boundary" to Zone R following an

exhaustive consultation exercise in 2016/7 and were now proposing something which conflicted with the Council's own definition of what constituted a logical boundary.

- 75 Some residents were confused between the various elements of the Consultation and mistook operational hours to be the same as boundary change.
- 76 It was the majority view of the residents she talked to that the Council had arbitrarily changed the basis of their decision-making from taking responses from an aggregate of streets in the 2016 Consultation to decision-making on a street by street basis in the present Consultation.
- 77 The dramatic reduction in responses from Ickburgh Road residents to the present consultation, as compared to the 149 responses resulting from the Council Consultation in 2016, is proof that many people did not respond because they were under the impression that whatever view they expressed would be ignored by the Council if the majority of streets in the area decided to the contrary. A lack of consistency in the way that the Council comes to their decisions had thus resulted in apathy and cynicism, resulting in an unwillingness to participate on the part of a significant number of residents.
- 78 The proposal to extend the operational hours of the parking controls in Ickburgh Road would have a disproportionately adverse impact on those who need to have regular home visits from health and welfare professionals, carers, relatives, friends and tradespeople. As someone who has had experience of caring for someone whose medical condition left them house-bound, she is concerned about the financial impact upon this group of vulnerable people. People on low and fixed incomes, such as welfare dependants and pensioners would also be financially disadvantaged.
- 79 The proposal to extend the operational hours of the parking controls in Ickburgh Road would impact most adversely on those sections of Eving Road and Brooke Road in Zone R who are in the immediate vicinity of Ickburgh Road and would be affected by displacement parking.
- 80 The Consultation documentation issued by the Council lacked clarity and adequate information on which to base an informed judgement, and was therefore subject to misunderstanding and confusion on the part of a significant number of Ickburgh residents. The objector was concerned by the arbitrariness and inconsistency which characterised the Council's decision-making and led to a

reduction in participation in the Consultation on the part of a considerable number of people in Ickburgh Road.

- 81 Concerns were also raised that some residents were disadvantaged by the Consultation period falling over a period when a number of residents were preparing for and celebrating Diwali. In her opinion, the Council had not given full consideration to the financial burden imposed by the proposed extension of parking controls on vulnerable people, such as welfare dependants and the elderly on fixed incomes and those who are dependent upon home visits.
- 82 Finally, although the Council are committed to taking into consideration the impact of parking displacement, they have failed to take into consideration the adverse impact upon streets in Zone R which are in close proximity to Ickburgh Road and would suffer an increase in parking stress;
- 83 The original consultation documents were not received and have therefore been denied the chance to review the proposals and have her opinion taken into account.
- 84 Their understanding is that there is a proposal to extend the parking restrictions into Saturday. They don't believe that further restrictions are necessary. They state that if the extension is being considered due to lack of parking space, they believe that this reason is unfounded as here are adequate spaces. They believe that this is another move by Hackney Council to raise cash from residents, without taking residents and their families into account. The road is not situated near a major shopping centre, football ground or entertainment venue which may give rise to issues for residents to park.
- 85 No consideration has been given to residents who rely on their friends and family. This extension would force residents to pay for friends and family who visit them on a Saturday. This may include people relying on a pension, or with less disposable income;
- 86 They objected to the imposition of charges before and their objections were ignored.
- 87 To now impose charges all day is a direct tax on and builders who work as tradesmen would need to pay all day.
- 88 To impose these charges is a direct flagrant of our democratic right as many people in Ickburgh Road objected to the imposition of charges previously.

**Response:**

- 89 The existing hours of operation for Zone R will remain as Monday to Friday 7am to 11am due to majority support from residents and businesses in the area. However, as there is majority support for Ickburgh Road to be relocated to Zone S, their hours of operation will be extended to match Zone S. This information was provided to residents in the consultation booklet which made it clear that the relocation of the road would mean adopting the same hours of operation as Zone S.
- 90 During the consultation, the Council gave residents the opportunity to have their say on whether they would like their road to move into Zone S. The roads consulted included Benthall Road (section between Evering Road and Ottaway Street), Brooke Road (section between Evering Road and Rendelsham Road), Dunnock Mews, Ickburgh Road, Maury Road (between Evering Road and Rendelsham Road), Ottaway Street, Rendelsham Road and Stellman Close.
- 91 Overall, the majority of the roads (7 out of 8 roads) were not in favour of the proposed boundary change, with the exception of Ickburgh Road where 59% of responses supported the relocation from Zone R to Zone S.
- 92 The Council's decision process to analyse results on a street by street basis is clearly outlined in the Council's Parking Enforcement Plan which was referred to in the consultation documents and is also available on the Council's website. This same process is followed for all consultations carried out by parking services. The boundary change decision would need to be analysed on a street by street basis as this allows us to only move those streets which support the decision to be relocated to Zone S.
- 93 The extension of the hours does mean that residents will need to use visitor vouchers for visitors until 6.30pm. Health and social care permits and vouchers are available to staff working for organisations providing essential health and social care services to Hackney residents. Permits are issued to applicants spending at least 30% of their time on the road visiting the community, working in medical or social care and working for a specifically named institution.

These include:

- Homerton University Hospital
- City and Hackney Clinical Commissioning Group
- East London Foundation NHS Trust

Council staff and private companies are not eligible.

- 94 There are also concessions available for those over the age of 60 whereby they are able to buy visitor vouchers at a reduced price. The Council is continually monitoring the impact of schemes/proposals that have been implemented and seeks the most effective way to balance residential, business and visitor needs, all of which are important to the Council. As the majority of Ickburgh Road residents were in favour of being relocated into Zone S, the Council decided to proceed with just Ickburgh Road and not the other locations.
- 95 With regards to the consultation documents, these provide detailed information to allow residents to make an informed decision on the parking proposals. All Council documents are approved by the Council's Communications Team before they are sent out to residents and businesses. In addition, where there are concerns regarding the information provided, a telephone number and an email is provided to allow residents to contact us. During the consultation process we did not receive any feedback on the quality of the consultation documents. The Council's average response rate for a review consultation is usually between 5-7%.
- 96 A consultation document was sent to every household and businesses within the consultation area. The address list used to send out documents are obtained from the LLPG (Local Land Property Gazetteer) which is the same source used for Council Tax bills, therefore all addresses within the consultation area would have been included in the mailing list. Unfortunately, once the documents are sent to Royal Mail, the Council cannot track whether residents have received them or not. However, we do ensure the consultation is well communicated to the public through local newspaper adverts, notices on site and through the Council website.



- 97 With regards to the length of the consultation, our policy requires us to carry out a consultation for a six week period. However, if there are requests from certain religious groups or ward members to extend the consultation due to religious beliefs which prevent residents from taking part in the consultation, then these will be considered and the relevant adjustments will be made. In the case of Zone R, the Council carried out its duties by giving residents a six week period to respond to the consultation. As there were no extenuating circumstances in this area to extend the consultation, the Council kept to the standard six week period.
- 98 In terms of the maps provided within the consultation documents, the key on the user friendly map clearly identified those streets which were being relocated to Parking Zone S. Please see Council website for copy of the user friendly map: [https://consultation.hackney.gov.uk/parking-services/zone-r-parking-review/supporting\\_documents/HDS7693\\_Zone%20R%20map%20HR.pdf](https://consultation.hackney.gov.uk/parking-services/zone-r-parking-review/supporting_documents/HDS7693_Zone%20R%20map%20HR.pdf)
- 99 The questions listed within the questionnaire made it clear that Section 3 only applied to the boundary change and listed the roads which would be affected by this. Please see copy of questionnaire as per the link in section 98 above.
- 100 The decision to consult on the relocation of Ickburgh Road was as a result of feedback received from residents in the area during the initial displacement consultation of Zone R. During this consultation all uncontrolled roads within the Rectory Road area including Ickburgh Road, which is within close proximity of both Zone S and Zone R were consulted as part of the zone R boundary. Once controls were introduced in Zone R, feedback received from residents on Ickburgh Road stated that it would be more convenient for them to form part of Zone S as the closest road they can park on other than Ickburgh Road was a section of Brooke Road which is within Zone S. Currently residents in Ickburgh Road would need to drive through Zone S to get to Zone R. Therefore, moving Ickburgh Road to Zone S creates a more logical boundary. There is no set criteria that a road can only form a logical boundary with one zone. A road which falls within the boundaries of two zones can form a logical boundary with either zone.

101 With regards to the consultation documents, as previously stated, these documents are checked by our Communications team to ensure that the information is clear and transparent and uses plain English to allow people to make an informed decision. The proposals within the questionnaire were split into different sections to allow residents to easily comment on each proposal and this was coupled with a user friendly map to help aid in their response. The consultation was also widely advertised to ensure that residents and businesses were made aware of the consultation. The Council makes every attempt to increase the response rate to consultations by advertising the consultation on-street, in the local paper and on the Council's website.

102 The Council recognises that any changes made to the design of parking controls, can have an impact on nearby roads which may have no controls or shorter hours of operation. Residents of Zone R were given the opportunity to have their say on the hours of operation and were given the option of longer hours. The majority of residents and businesses did not support longer hours in Zone R and as a result these will remain as Monday to Friday 7am-11am. The Council will continue to monitor parking stress in Zone R to ensure that residents are not impacted by displacement parking from nearby roads. Residents are able to contact the Council if they are experiencing parking pressure due to changes in parking proposals. The Council will then take the necessary steps to try and eliminate these issues.

### **Equalities Impact Assessment**

103 As part of the consultation process, the Council carried out an Equality Impact Assessment to ensure that the proposals made do not have an adverse effect on the parking needs of specific groups including disabled drivers.

104 The public consultation provides an open forum for all local users to have their say on the introduction and the design of local parking controls. The introduction of controls has a positive impact on all road users (motorists, pedestrians and cyclists) by creating a safer road environment and by creating parking scheme which meets the needs of local users.

**Financial Implications**

105 The total expenditure for the proposals were £6886.00 which includes the consultation costs, implementation of new signs and Traffic Order changes.

**Recommendation:-**

After considering the objections to the publication of the proposals as part of the traffic management order, it is recommended to;

- Relocate Ickburgh Road into Zone S with the operational hours of Monday to Saturday 8.30am to 6.30pm.

**Approval**

I have noted the contents of this summary and agree with the recommendations contained therein.

Signed..........

Dated.....4/7/19.....

**Kevin Keady – Head of Parking and Market Services**

**CC: Aled Richards – Director Public Realm**

**CC: Jon Burke – Cabinet Member for Neighbourhoods**

**CC: Andrew Cunningham – Head of Streetscene**

## Appendix

### Objection 1



Date: 27 May 2019

Dear sir/madam

I wish to express my objections to the proposal to extend the operational hours of the parking controls on Ickburgh Road. There are a number of reasons for my objection:

- 1) There is no justification for extending the existing operational hours which are perfectly adequate.
- 2) I note that the consultation outcome document states that 79% of the people consulted are in favour of retaining the existing system. Nowhere does it say that decisions on parking controls will be made on a street by street basis. Furthermore, if I recall correctly, when the current system was introduced, it was done so on the basis of everyone consulted - not on a street by street basis. The basis for the decision to extend the current hours is therefore arbitrary and inconsistent.
- 3) the extension of the hours will cause significant economic hardship to all users, but particularly to those of us like me, who, at 98 years old, need to have regular visits from healthcare practitioners e.g. physiotherapists and chiropractors and also those who visit for personal and social care reasons. The proposal therefore discriminates against the elderly, disabled and infirm.
- 4) Like many others, I found the consultation document muddled and lacking in clarity. I believe that this is the reason for the poor response rate (the response rate to the initial consultation were far higher) and residents did not understand the implications of the proposal.

## Objection 2

[REDACTED]

Date: 27 May 2019

We strongly object to any increase in parking charges in Ickburgh Road.  
We objected to the imposition of charges before and our objections were ignored.  
To now impose charges all day is a direct tax on and builders work as tradesmen would need to pay all day.  
To impose these charges is a direct flagrant of our democratic right as many people in Ickburgh road objected to the imposition of charges previously

Date: 01 June 2019

Dear Sir or Madam

X I was present two years ago when the parking restrictions for Ickburgh Road were discussed and although one of our residents had taken the time to speak with everyone in the road and thus proved that the majority were against it, we were then told by the Mayor that it was going ahead anyway.

Neither my husband or myself own a car, however many of our friends and family do and if they visit public transport is often not an option. Also any trade person who needs a van or car will ultimately cost us more.

I can see no justification for this increase and in the light of past events I am deeply suspicious of this councils so called consultations.

I would therefore like to voice my objections to this greedy and unwarranted increase in fees

## Objection 3

[REDACTED]

Date: 31st May 2019

Dear Sir or Madam,

With regard to the above, I would like to object to the proposed plans on the following grounds:

1. I did not receive the original consultation documents and have therefore been denied the chance to review the proposals and have my opinion taken into account.
2. My understanding is that there is a proposal to extend the parking restrictions into Saturday. I don't believe that further restrictions are necessary. If the extension is being considered due to lack of parking space, this reason is unfounded: there are adequate spaces. This is another move by Hackney Council to raise cash from residents, without

taking residents and their families into account. The road is not situated near a major shopping centre, football ground or entertainment venue which may give rise to issues for residents to park.

3. No consideration has been given to residents who rely on their friends and family. This extension would force residents to pay for friends and family who visit them on a Saturday. This may include people relying on a pension, or with less disposable income.

#### Objection 4

  
Date: 1 June 2019

I am writing to object to the Council proposal to extend the operational hours of parking controls in Ickburgh Road. My reasons are as follows:

1. My personal experience is that at least two of my immediate neighbours did not receive the consultation document.
2. I understand that a recent parking consultation of residents in Stamford Hill West, Springfield gave residents nine weeks to respond in contrast to the six weeks allowed to Ickburgh residents. When I queried this I was told that the "religious holidays" of certain residents had been taken into consideration. A number of households in Ickburgh Road consist of people originating from the Indian sub-continent who celebrate the festival of Diwali. They were unaware that the religious holiday of Diwali could be a reason for extending the consultation period. In 2018 preparations for Diwali began in advance of the opening of celebrations on 6th November and continued until 10 November. Celebrants of Diwali were thus disadvantaged in comparison to other religious groups e.g. consultees in the recent Stamford Hill West, Springfield consultation.
3. I understand that a number of Ickburgh residents misunderstood or were confused by the Consultation document. It was possible on a quick perusal of the Consultation document to interpret from the roads listed under the proposed boundary change that it was areas of Council housing that were being consulted, as streets in Landfield Estate, parts of Nightingale Estate, Benthall Court and Council properties in Maury Road were listed. Ickburgh Estate lies at the end of Ickburgh Road and therefore this was a perfectly reasonable if mistaken conclusion. In addition, the map referred to in Question 2 of the Consultation document headed "Zone S - Boundary Relocation Map" did not indicate Ickburgh Road, Stelman Close, Ottaway Street, Dunnock Mews or Benthall Road at all and thus provided inadequate information for those who consulted the map for guidance.
4. Many residents could not understand why the Council should have come to the conclusion that Ickburgh Road formed a "logical boundary" to Zone R following an exhaustive consultation exercise in 2016/7 and were now proposing something which conflicted with the Council's own definition of what constituted a logical boundary.
5. Some residents were confused as between the various elements of the Consultation and mistook operational hours to be the same as boundary change.

6. It was the majority view of the residents I talked to that the Council had arbitrarily changed the basis of their decision-making from taking responses from an aggregate of streets in the 2016 Consultation to decision-making on a street by street basis in the present Consultation. The dramatic reduction in responses from Ickburgh Road residents to the present Consultation, as compared to the 149 responses resulting from the Council Consultation in 2016, is proof that many people did not respond because they were under the impression that whatever view they expressed would be ignored by the Council if the majority of streets in the area decided to the contrary. A lack of consistency in the way that the Council comes to their decisions had thus resulted in apathy and cynicism, resulting in an unwillingness to participate on the part of a significant number of residents.
7. The proposal to extend the operational hours of the parking controls in Ickburgh Road would have a disproportionately adverse impact on those who need to have regular home visits from health and welfare professionals, carers, relatives, friends and tradespeople. As someone who has had experience of caring for someone whose medical condition left them house-bound, I am concerned about the financial impact upon this group of vulnerable people. People on low and fixed incomes, such as welfare dependants and pensioners, would also be financially disadvantaged.
8. The proposal to extend the operational hours of the parking controls in Ickburgh Road would impact most adversely on those sections of Evering Road and Brooke Road in Zone R who are in the immediate vicinity of Ickburgh Road and would be affected by displacement parking.
9. In summary, I consider that the Consultation documentation issued by the Council lacked clarity and adequate information on which to base an informed judgement, and was therefore subject to misunderstanding and confusion on the part of a significant number of Ickburgh residents. I was concerned by the arbitrariness and inconsistency which characterised the Council's decision-making and led to a reduction in participation in the Consultation on the part of a considerable number of people in Ickburgh Road. I was also concerned that some residents were disadvantaged by the Consultation period falling over a period when a number of residents were preparing for and celebrating Diwali. In my opinion the Council had not given full consideration to the financial burden imposed by the proposed extension of parking controls on vulnerable people, such as welfare dependants and the elderly on fixed incomes and those who are dependent upon home visits. Finally, although the Council are committed to taking into consideration the impact of parking displacement, they have failed to take into consideration the adverse impact upon streets in Zone R which are in close proximity to Ickburgh Road and would suffer an increase in parking stress.

