

West Hampstead Amenity and Transport group

Response to Camden's Consultation on 'Healthy Streets, Healthy Travel, Cleaner, Fairer Parking'

VISITOR PARKING

Introduction

West Hampstead Amenity and Transport group (WHAT) wishes to make clear its strong opposition to the proposed removal of paper vouchers/scratch cards for visitor parking. We believe that this would have an unreasonable, adverse impact on the ability of older and more vulnerable residents to receive visits from family, friends and those who provide a variety of services essential to independent living.

In 2019/20 we carried out a major survey of our members and other groups which showed us that the vast majority felt strongly about the need for scratch cards to be retained. Many felt that older people's needs were being ignored. We received statements such as '*Camden seem to disregard my generation (over 70's). Everything seems to be done on-line these days and I cannot cope with it. At times over the last year my mobility has been impaired and I have had to rely heavily on a couple of relatives who live where buses are very infrequent so need to drive here to help me out. If it hadn't been for a few scratch cards left I don't know what we would have done. At the moment I don't know how to get hold of more..... I have lived in the London Borough of Camden for most of my adult life and have always spoken up for it as an excellent borough. It is not worth spoiling its reputation for a paltry few pounds from its older citizens'*

We provided Camden with this evidence, as well as statistics from ONS, Age UK and other sources showing that far higher proportions of older and vulnerable people did not have access to (or the ability to use) digital technology. In summary:

- We argued that the removal of a paper based voucher system would have a discriminatory, adverse impact on these groups under the terms of the Equality Act's provisions for people with protected characteristics.

We also argued

- that the removal of scratch cards in favour of a digital system requiring online accounts and digital devices would also discriminate against those less affluent residents whose ready access to computers, 'modern' smartphones and the internet is limited – in some cases virtually non-existent.
- that the ease of use and flexibility inherent in paper based visitor parking was an important factor in residents' ability to deal with the pressures and unpredictability of urban living

Each of the above reasons for retaining scratch cards retains its force. The strong opposition expressed by WHAT members in 2019 has been reinforced again by feedback we have received in the last few weeks. Recent statistics continue to show considerable inequalities in the impact of an increasing reliance on solely online services. For example:

- The Age UK report 'Digital inclusion and older people – how have things changed in a Covid-19 world?' stated that the pandemic **has not in fact produced a sea-change in older people's use of technology**. Age UK has issued a warning regarding the drift towards services and activities being online: '...it is therefore essential that those who cannot or do not want to use the internet are not excluded or disadvantaged as a result'.

- The 2020 Use of Communication Services survey revealed ***the impact of combining multiple demographic characteristics on levels of device ownership***. For example, one in five of those aged 70+ and living alone lacked access to a connected device in the household, as did a third of those living alone and with an impacting or limiting condition. Of those who lived alone, were aged over 70 and had a limiting condition, more than half didn't have access to a connected device in their household. (*Source: A review of OFCOM's research on digital exclusion among adults in the UK – 30 March 2022*)
- **Many London Councils (as well as those elsewhere) are retaining paper based visitor parking systems** – generally alongside a 'virtual' visitor voucher system. This dual approach is taken in recognition of the needs of many residents for a system that values the full diversity of its residents and the complex circumstances for which parking sessions need to be arranged.

Camden Council has the opportunity to demonstrate that it too recognises and values the full diversity of its residents and their needs by retaining a dual system.

We appreciate Camden's wish to reduce the level of carbon based emissions from vehicles using our streets. However, we feel that the relatively small allocation of paper vouchers that will be required to meet the needs of those for whom the virtual process creates major barriers – and for those circumstances in which the digital system is wholly impractical – is justified.

We also feel that the application of differential charging rates for visitors – whose charges for driving in the borough will already be defined in a more sophisticated and exact way than the Council's approach based partly on age of vehicle – is unfair. As one of our members has stated: '*With the visitors permit, it is hardly likely that a visitor will change their car in order to visit me at a lower cost to me. It seems potentially extremely unfair and I wonder what research has been done on its likely effectiveness and unintended consequences - e.g. stopping visitors to isolated individuals*'.

Reasons for Retaining Scratchcards

We set out below the main reasons for retaining scratch cards. We also provide some examples of the approaches taken by other Councils – approaches that could well be drawn on by Camden for its way forward.

Inequality and Discriminatory impact

First, we believe that Camden has a duty to meet the needs of its older and vulnerable residents - and to reduce rather than increase the inequalities faced by them and other residents: These include:

- ***The likely discriminatory impact on older and vulnerable residents*** – as illustrated by the ONS statistics on digital exclusion quoted above – which make a very strong case for retaining the paper based system for visitor parking. Alongside this:
- ***The impact on increasing loneliness and reducing well-being***: Older people may well be overrepresented among those who require daytime visitors – not least to prevent loneliness and provide essential support for safe and comfortable living

There are other ways too in which a wholly digital system would adversely affect many Camden residents:

- ***The length of parking restrictions varies considerably between different parts of Camden*** with many areas restricted for 10 hours every weekday and some with restrictions at weekends too. This means

that in varying degree some residents will always need visitor parking permits – even for a brief half hour visit. Provision of paper permits is an essential and practical way of satisfying this demand.

Lack of flexibility

Second, we believe that paper based vouchers provide the most practical response to many situations in which a solely digital approach is wholly inappropriate and inefficient.

On the contrary, the scratch card system is highly user friendly. Many WHAT members have made this point. For example: '*They are a fantastically easy system that cannot be bettered by having to go through some massive online palaver just to have a visitor for an hour or two.*'

In particular we draw attention to:

- **Unexpected and emergency visits – particularly when the resident and/or account holder is not at home – e.g. hospital visits, unexpected work or family demands**

These situations are exacerbated for many households where there is only one accessible device – or only one Camden account containing virtual vouchers - when the account holder is not at home or is otherwise unavailable to allow parking access for a family member or other essential visitor. This is likely to impact disproportionately on older and less affluent residents and in some or many cases, on women in households where a male resident controls such arrangements.

- **Ageing housing stock.**

Much of Camden's housing stock is old, requiring regular maintenance and repair. The need for residents to have visits for essential needs such as electrical and plumbing repairs makes it particularly important for a simple, flexible method to be available – given traffic and other delays. Relying on a solely virtual system would require an elderly, disabled person or less affluent person without internet access to walk to the library (an alternative approach for those without access to personal devices suggested in earlier discussions with Camden staff) in order to book or amend a parking session.

Several Councils recognise these needs by explicitly asking residents to use scratch cards for this purpose. (**Harrow**, for example states that residents of CPZs must purchase visitor parking permits for tradespeople to allow them to park their vehicles)

- **The impact on people without digital devices and/or with limited internet and phone contracts:**

It is not always recognised that many people lack easy access to the internet and manage their mobile phone calls and data via 'pay as you go' sims. In these cases the added cost and stress of internet delays or long telephone sessions would make the virtual voucher approach particularly difficult and may well deter them from receiving the visitors they want and need.

The unequal impact that will be experienced in the situations described above is again demonstrated by the fact (already outlined) that most Camden residents live in CPZs where parking is restricted for many hours of the day and week - making it particularly difficult to meet the demands of arranging essential visitor sessions without anxiety, inconvenience and additional cost. The proposal that all parking in 'paid for' parking bays will be restricted in future to two rather than four hours (or to one hour in two hour CPZs) will add to these difficulties.

Third, as highlighted above, we do not believe that the Council's main reason for relying solely on a virtual voucher system – based on the wish to apply carbon emission based charges to residents' visitors – is justified.

The large increase in the proposed charges for E-voucher sessions for some vehicles will apply financial penalties to residents in circumstances over which they have no control. Family members and friends, often from outside London, will be unlikely to change their vehicles in order to make a few visits. Equally, if a plumber or other essential service provider or organisation is visiting, how much the resident pays for them to visit will make no difference to their choice of vehicle. As outlined above – the ULEZ charge will ensure that the most polluting vehicles will already be charged more highly. It is worth noting too that a large proportion of traffic in residential roads is due to delivery vehicles that don't pay parking charges.

Availability of scratch cards is limited to existing subscribers and continuing demand is likely to be small in number. The relatively small allocation that will be required to meet the needs of those for whom the virtual process creates major barriers – and for circumstances in which the digital system is wholly impractical – is fully justified. Their continuing use should be accommodated as an exception to the electronic scheme.

Additional Points

Visitor Parking Charges and Concessionary Rates

1. *Camden's concessionary rates start at 75+*

WHAT is disappointed to see that the proposals retain the 75+ age threshold over which residents are allowed discretionary rates for visitor parking vouchers. This is a higher threshold than in many (if not all) other London Councils where thresholds range from 'over 60s' (e.g. Islington, Richmond, Hackney - where there is a 50% discount for the first 20 books of scratch cards per year) to 70 and over (e.g. Wandsworth)

2. *There is a considerable proposed increase in the cost of visitor parking permits/sessions. (Current charges range from £1.24 to £8.79. Proposed charges range from £1.24 to £20.57)*

These proposals will result in Camden introducing very high charges compared with those applied to both virtual and paper based visitor vouchers by many London Councils. In addition:

- Several Councils allow a ***free initial allocation*** of a fixed number of vouchers (virtual or paper based) with charges applied for subsequent orders. In ***Waltham Forest***, for example, there are varying amounts of free allocation for households with at least one resident over 60 – or with a new born baby.
- Charges for hourly, daily and in some cases weekly sessions are generally lower in other Councils.
- In many cases a certain number of vouchers is provided at a lower rate – above which increased charges are applied.

3. ***Carer permits.*** Many Councils make provision for carer visitor permits. ***Hounslow***, for example states that: '...if you need regular visits from a carer to maintain an independent life you can apply for a carer parking permit'. This is an annual permit – charged at £70.88. ***Barnet*** provides printed carer permits free of charge – lasting for 6,12,18, 30 or 36 months. Camden's proposals do not make any reference to the situation for people who need regular and frequent visits for such essential visits.

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