

Committee: Council

Date: 5 February 2020

Wards: All

Subject: Proposed change to Parking PCN charges from Band B, to Band A.

Lead officers: Chris Lee, Director of Environment & Regeneration

Lead members: Cllr Martin Whelton Regeneration, Housing and Transport

Contact officer: Ben Stephens, Head of Parking Services

1. Recommendations: Council

- 1.1. Subject to consultation, the Council approves the proposal to change parking Penalty Charge Notice (PCN) charges from Band B to Band A.
- 1.2. To agree the consultation process and timescales set out in this report and authorise the Director of Environment (in consultation with the Lead Member) to conduct the consultation process.
- 1.3. Subject to the consultation, the Director of Environment (in consultation with the Lead Member) is authorised to take all necessary steps to give effect to the proposed change of Band.

2. OVERVIEW

- 2.1. The change of Penalty Charge Notice (PCN) bands from band B to band A (higher charge) is considered essential to act as an effective deterrent and to reduce the number of vehicles parking in contravention.
- 2.2. Over the past 4 years, effective enforcement of parking and traffic restrictions has not provided the necessary deterrent to effect a significant reduction in the number of PCNs being issued.
- 2.3. The following table shows the number of Parking PCNs issued in the last 4 financial years. These figures do not include PCNs issued via ANPR for Moving Traffic Contraventions or Bus Lane Contraventions.

Financial Year	Parking PCNs issued (on and off street)
2015/16	54,701
2016/17	66,473
2017/18	66,745
2018/19	68,573

- 2.4. The above figures show that there has been a 25% increase in the number of PCNs issued for parking contraventions between the financial years 2015/16 and 2018/19.
- 2.5. A review of the parking PCNs issued in 2018/19 shows that approximately 72% of the total number of parking PCNs issued in that financial year were issued to vehicles that are not registered to an address within the London Borough of Merton.
- 2.6. The recent application to London Council TEC Committee from the Royal Borough of Greenwich shows that over the last four years London has seen an overall increase in PCN's of 13.6% during this period, Merton is experiencing a higher level of non-compliance, at 25% than the overall London trend.
- 2.7. Further to the provisions of the Traffic Management Act 2004 (TMA), the primary purpose of penalty charge levels is to encourage compliance and as such, banding levels should be set accordingly.
- 2.8. The Government introduced the De-Regulation Act (2015) which restricted the Councils use of Closed Circuit TV (CCTV) for most parking contraventions. This has resulted in increased non-compliance and we have seen an increase in the number of PCNs that would have been issued by CCTV before the ban, which are now being enforced by Civil Enforcement Officers (CEO). We believe that this increased noncompliance needs to be countered with an increase in the penalty charge band.

- 2.9. Parking enforcement, whilst highly contentious, is an essential element of improved road safety for all road users and pedestrians in the borough. Bus Lane enforcement facilitates the use of alternative, greener transport, and this enforcement as well as the enforcement of moving traffic restrictions, reduces the travelling and response times of emergency service vehicles.
- 2.10. Over the coming years, Merton and London will see a growth in population as the population across London is estimated to grow to 10 million people. It is inevitable that, despite many new developments in Merton being car free, this will in turn lead to more traffic (as not all traffic on Merton's roads originates from within Merton), increasing stress on the boroughs main roads, increasing journey times, worsening bus reliability, and contributing to poor air quality.
- 2.11. Improved compliance is essential to support many of the Councils objectives, including encouraging a greater uptake on sustainable forms of transport, helping to improve air quality, and improving journey times.
- 2.12. It is also expected that improved compliance, as a result of moving banding charges will result in;
- Fewer cars parked on single and double yellow lines, resulting in safer roads
 - Fewer cars parked on pavements and at other unauthorised locations
 - Fewer overstaying cars at on and off street pay and display locations, resulting in a better turnover of spaces for visitors to town centres and less congestion from cars 'circling' and looking for available parking
- 2.13. Local authorities are not permitted to use parking charges solely to raise income. When setting charges, we must instead focus on how the charges will contribute to delivering the Council's traffic management and other policy objectives. In this instance, it is anticipated that the move from Band B to Band A charges will result in increased compliance, contributing to traffic management objectives, and in addition, this will also help contribute towards our strategic approach to improving air quality.

2.14. Moving Parking PCNs from Band B to Band A will help to support these objectives. PCNs issued for Bus Lane contraventions or Moving Traffic contraventions are already charged at Band A.

Figure 1: The charges for Band B PCNs are as below;

	Band B	Band B	Band A	Band A
Contravention	Full charge	Discount if paid within 14 days	Full charge	Discount if paid within 14 days
More serious	£110	£55	£130	£65
Less serious	£60	£30	£80	£40

3. Car use, congestion and charging in context.

- 3.1. At the end of June 2019, there were 38.7 million licensed vehicles in Great Britain, an increase of 1.3% compared to the end of June 2018. The total number of licensed vehicles has increased in all but one year (1992), since the end of the Second World War.
- 3.2. The council recognises the part that it has to play in developing and delivering a framework to tackle air quality, manage demand for parking, and congestion in the borough. It does not stand alone on these issues. All of the other London boroughs are seeking to implement new parking policies to tackle similar problems.
- 3.3. Indeed, in July 2019, Merton declared a climate emergency and set an ambitious carbon reduction target to make Merton carbon neutral by 2050. Merton will also work towards decarbonising all council buildings and services by 2030. Currently, 25% of the boroughs carbon emissions are related to motorized transport.

- 3.4. The Council has a Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by 'making the healthy choice the easy choice'.
- 3.5. In setting out its measures of success, Merton's charging policy aims to deliver reduced/changed car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets - to benefit residents and businesses alike.
- 3.5.1. Ensuring the traffic moves freely by reducing motorists parking in contravention through appropriate charging and other initiatives to develop a better street environment is another key policy for Merton.
- 3.5.2. Merton's LIP 3 programme contains a series of actions through to 2041, which include.
- Reducing the impacts of climate change and improve local air quality.
 - Improving connectivity and whole journey experience to the public transport network, especially for people with restricted mobility to support a more inclusive society.
 - Reducing health inequalities.
 - Making Merton a safer place by reducing the number of collisions on our streets and supporting the Mayor's Vision Zero objective.
 - Supporting good growth, especially around the town centres at Colliers Wood and South Wimbledon, Morden and Wimbledon, and regeneration in and around Mitcham.

- Redefining the way our streets are laid out and used, to encourage the take-up of more active and healthier lifestyles where people feel confident to walk and cycle safely.

3.6. A comprehensive 2018 policy report by London Councils 'Benefits of Parking Management in London August 2018' stated that:

- Parking management is the only mechanism through which local authorities can ensure stationary vehicles are parked in an amenable and equitable manner, thus solidifying its importance and the benefit it delivers.
- There are many parking management benefits, which include reducing congestion, improving air quality, providing funding for parking and wider transport scheme improvements and ensuring good access and accessibility.
- Of particular significance is the fact that these benefits deliver benefit to everybody, from motorists themselves to the person sat at home, and all road users and non-road users in between.

3.6.1. The proposed change in banding is just one of a number of levers being used by Merton to adjust driver behaviours and reduce driver complacency in relation to PCNs. Either to use other forms of transport, or at least adhere to the parking restrictions in place; which contribute to the traffic management of the borough, and it is our contention that an increase from band B to Band A charges will help to deliver this change.

3.6.2. Many other London Boroughs have already successfully applied to move from Band B to Band A charges for part, or all of their geographical areas of responsibility, the London Borough of Croydon being our closest neighbour to have done so.

3.6.3. Data published by the London Borough of Greenwich in their application to move to Band A charges for the whole borough showed that in the areas where Band A charging was in force, motorists were less likely to commit a higher level contravention than in areas where Band B charges were in force.

3.7. Existing Controls

- 3.7.1. The Council operates 63 Controlled Parking Zones (CPZ) across the borough. Waiting and loading restrictions also apply in many locations outside CPZs.
- 3.7.2. Planning policy is also used to minimise additional parking pressures arising from developments in some areas.
- 3.7.3. The Councils enforcement regime consists of Civil Enforcement Officers (CEO) deployed in mobile enforcement units and on foot. In addition, we have a network of Automatic Number Plate Recognition (ANPR) cameras that are strategically placed throughout the borough to enforce a range of moving traffic and bus lane contraventions. We also have 2 mobile CCTV units.
- 3.7.4. Despite these measures, and employing a robust parking and traffic enforcement regime, the borough continues to experience high levels of non-compliance with its parking regulations.

4. Financial, resource and property implications

- 4.1. Whilst the purpose of any enforcement regime is to improve compliance with the restrictions in force, consideration also needs to be given to any surplus money that may be generated as a result of moving to these charges
- 4.2. Section 55 of the Traffic Management Act (2004) specifies what any surpluses from parking activities may be used for. Surpluses from parking activities are currently used to contribute towards concessionary travel for Merton residents, and carriageway and footway maintenance.
- 4.3. Any additional surplus from a change to the banding charge will continue to contribute towards these activities, but the desired effect of the change is to reduce the number of contraventions.

- 4.4. In the last financial year (2018/19), Parking Services issued 68,573 PCNs for parking contraventions. This was made up of 40,159 higher level PCNs, and 28,414 lower level PCNs.
- 4.5. The Traffic Management Act (2004) recognises that some contraventions are more serious than others, and introduced differential charging in recognition of this e.g. A PCN issued to a vehicle parked on double yellow lines would be a higher level PCN charged at £110 or £55 if paid within 14 days (at Band B charges) whereas a PCN issued to a vehicle that was parked beyond the expiry of a pay and display ticket would be a lower level PCN charged at £60 or £30 if paid within 14 days (at Band B charges).
- 4.6. The total amount of money received in payment for PCNs issued by Civil Enforcement Officers in this period was £3,821,375.

5. ALTERNATIVE OPTIONS

- 5.1. The do nothing option (not increase charges) would not address the problem of motorists taking the risk to park in contravention. An increase in the PCN charge would have a greater effect on reducing illegal parking.
- 5.2. Consideration has been given to apply Band A, only at certain locations within the borough. However, the number of and location of PCNs issued throughout the borough remains high and PCN are issued regularly between the hours of 7am to 11pm.

6. Approval process

- 6.1. A set approval process must be complied with in order to change from Band B to Band A charges. The table below sets out process to be followed;

No.	Approval Body	Description	Date
1.	Approval from Council	It would be necessary for the Council to approve and undertake a resolution to	February 2020

		move from Band B PCN charges to Band A PCN charges.	
2.	Public Consultation	Once approval has been given by the council, it is then necessary for the Council to consult with stakeholders.	March to May 2020.
3.	Approval from the Transport and Environment Committee	Application is made to London Councils requesting the move from Band B to Band A PCN charges, based on the model agreed following consultation. London Councils will prepare the report on behalf of the borough applying for these changes.	May – October 2020
4.	Approval from the Greater London Authority	Transport and Environment Committee need the approval of the Mayor of London. The committees' decisions will be formulated into a set of proposals to be presented to the Mayor of London for approval.	June – October 2020
5.	Approval from the Secretary of State	If the Mayor of London agrees the changes, the Secretary of State has 28 days to exercise a veto over any changes.	July – October 2020
6.	Implementation	Once approval has been given by the Secretary of State for Transport, there is a requirement for the proposed changes to be advertised for at least 3 weeks prior to implementation.	October 2020 - April 2021

7. Consultation Process

- 7.1. Once approval has been given by the Council, it is then necessary for the Council to consult with stakeholders about the resolution to move from Band B to Band A PCN charges. Given that this change will affect residents within the borough, as well as those living outside the borough, it will be necessary to undertake a full borough wide consultation.

7.2. Merton is committed to undertaking comprehensive consultation to gain the views of residents and stakeholders. This enables the Council to make informed decisions and to develop our policies.

7.3. A consultation will take place during the period March 2020 to May 2020. This consultation will form part of a statutory consultation process, and meet the relevant legal obligations to consult, as well as a commitment to bringing the proposals to as wide an audience as possible.

7.4. To ensure the council generates as much feedback as possible, representations will be invited in writing via the web page, or by email to a dedicated email box.

7.5. As well as the online consultation and an article in My Merton article the council will also undertake the following:

- A statutory notice placed in the newspaper.
- Copies of all proposals and background papers will be made available on deposit at all libraries and at the Civic Centre for public inspection/reference.
- Consult with statutory and non-statutory consultees.
- Consult with all recognized Equality Groups in Merton.
- On the council's home page, we will display a link to the consultation web pages. The web pages will give full details of the proposal along with background papers and reports. The pages also included a section, which aimed to address frequently asked questions.

7.6. **Boundary considerations**

7.7. It is the Transport and Environment Committee (TEC) policy that the boundaries between areas of different penalty bands are clearly demarcated to avoid the possibility of having different bands on opposing sides of the same road.

- 7.8. The London Borough of Merton shares boundaries with the London Boroughs of Sutton, Croydon, Lambeth, Wandsworth and the Royal Borough of Kingston upon Thames.
- 7.9. A full list of affected roads is shown in Appendix 1.

8. Legal and statutory implications

Statutory Provisions

- 8.1. The Road Traffic Regulation Act 1984 (s.122) specifies that the functions conferred on local authorities under the Act should be exercised:
- “to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway”.*
- 8.2. This includes (in s.122(1) of the Act)
- a) The desirability of securing and maintaining reasonable access to premises;
 - b) The effect on the amenities of any locality affected and (without prejudice to the generality of this paragraph) the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run;
 - c) The strategy prepared under Section 80 of the Environment Act 1995 [National Air Quality Strategy].
 - d) The importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles.
 - e) Any other matters appearing to the local authority to be relevant.

- 8.3. Under Section 45 of the Road Traffic Regulation Act 1984 (RTRA 1984) local authorities may designate parking places and may make charges for vehicles left in a parking place so designated. In exercising its functions under the RTRA 1984, including the setting of charges for parking places, the Council must do so in accordance with Section 122 of the RTRA 1984 above.
- 8.4. In addition, s.45(3) of the Act provides that in determining what parking places are to be designated under this section [45] the local authority shall consider both the interests of traffic and those of the owners and occupiers of adjoining property, and in particular the matters to which that authority shall have regard include—
- (a) The need for maintaining the free movement of traffic;
 - (b) The need for maintaining reasonable access to premises; and
 - (c) The extent to which off-street parking accommodation, whether in the open or under cover, is available in the neighbourhood or the provision of such parking accommodation is likely to be encouraged there by the designation of parking places under this section.
- 8.5. In accordance with the council's statutory responsibility under Section 122, the Council must have regard to these relevant considerations in the setting of charges. Setting pricing levels on the basis set out in this Report appears to be consistent with the requirements of the Act (provided that countervailing factors are also taken into consideration, as they have been in the present proposals).

Fiscal Implications

- 8.6. The Road Traffic Regulation Act 1984 is not a fiscal or revenue-raising statute. In *Djanogly v Westminster City Council* [2011] RTR 9, Lord Justice Pitchford, in the Administrative Court, held that:

"In my view, when designating and charging for parking places the authority should be governed solely by the s.122 purpose. There is in s.45 no statutory purpose specifically identified for charging. Charging may be justified provided it is aimed at the fulfilment of the statutory purposes which are identified in s.122"

(compendiously referred to by the parties as "traffic management purposes"). Such purposes may include but are not limited to, the cost of provision of on-street and off-street parking, the cost of enforcement, the need to "restrain" competition for on-street parking, encouraging vehicles off-street, securing an appropriate balance between different classes of vehicles and users, and selecting charges which reflect periods of high demand. What the authority may not do is introduce charging and charging levels for the purpose, primary or secondary, of raising s.55(4) revenue."

- 8.7. This was in accordance with the previous Court decision in *Cran v Camden LBC* [1995] RTR 346, and was subsequently approved by the High Court (Mrs Justice Lang DBE) in the case of *R (Attfield) v London Borough of Barnet* [2013] EWHC 2089 (Admin).

Application of Revenue

- 8.8. In terms of any income that may be generated by the increased charges, the Traffic Management Act 2004 amends section 55 (4) of the Road Traffic Regulation Act 1984 and directs that income should be used:

- (a) To make good any payment used for parking places,*
- (b) For the provision of or maintenance of off street parking (whether in the Open or not) and*
- (c) Where off street parking provision is unnecessary or undesirable:*
 - (i) To meet the costs of provision of or operation of public passenger transport services, or*
 - (ii) For highway or road improvement projects within the borough, or*
 - (iii) For meeting costs incurred by the authority in respect of the maintenance of roads maintained at the public expense by them,*
- Or*
- (iv) For the purposes of environmental improvement in the local authority's area, or*
- (v) Any other purposes for which the authority may lawfully incur expenditure.*

- 8.9. In addition, for London authorities, this includes the costs of doing anything “which facilitates the implementation of the London transport strategy”
- 8.10. However, for the reasons set out above Members must disregard any benefit in terms of the revenue that may be generated by these proposals when making the decision as to whether to proceed or not.

Decision-making: Public Sector Equality Duty (PSED)

- 8.11. In considering this Report and coming to their Decision, Members should 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 characteristic and persons who do not share it.

(Public Sector Equality Duty (s.149 Equality Act 2010))

- 8.12. The characteristics protected by the Act are:

- a. age;
- b. disability;
- c. gender reassignment;
- d. marriage and civil partnership;
- e. pregnancy and maternity;
- f. race;
- g. religion and belief;
- h. sex; and
- i. sexual orientation

- 8.13. Due regard means that the duty has been considered ‘substance, with rigour, and with an open mind’ and requires a proper and conscientious focus on the statutory criteria.
- 8.14. The PSED is a duty to have due regard to the specified issues, and not to achieve a particular outcome.
- 8.15. Members should have due regard to the Council’s Equality Impact Assessment which accompanies this Report.

Decision-making - General Principles of Public Law

- 8.16. In considering his Report and coming to their decision, Members should ensure that the decision is one which is rational in public law terms.
- 8.17. This requires that Members carefully consider all relevant information, and disregard any information which is irrelevant, and so the proposed policy, the reasons for the proposed charging scheme and pricing should be considered with regard to the statutory purposes of the Road Traffic Regulation Act set out above.

Duty to give conscientious consideration to the consultation results

- 8.18. The Courts have held that a consultation should meet the following standards:
- Consultation must be at a formative stage
 - Sufficient information should have been provided to ensure consultees are able to provide a full response
 - Sufficient time for response should be allowed, and
 - Members should conscientiously take the consultation responses into account

Modifications and Post-decision process for making the proposed Orders

- 8.19. The draft Cabinet report recommends that the TMOs be made with the following modifications: -

- 8.20. If Cabinet agree with the officer recommendation that the proposed modifications do not appear to make a substantial change in the TMOs, the orders can be made without further consultation described in paragraph 9.26 above.
- 8.21. The process would be as follows: -
- (a) Choose a date to make the TMOs and an operational date for the Orders.
- 8.22. Orders once made are subject to a statutory 6-week judicial review period during which applications can be made to the High Court by persons wishing to question the validity of the Orders on the grounds that they are not within the powers of the Road Traffic Regulation Act 1984 or that the appropriate statutory procedures have not been complied with.
- 8.23. It would be prudent that the new charges come into force after this 6-week period has expired to avoid unnecessary costs that might be incurred delaying the implementation of the TMOs should a legal challenge be made against the Orders in the High Court.
- 8.24. Please note that the publication of the notice of making the TMOS is not an invitation to make further representations.
- (b) e-mail or write to all Cllrs and associations confirming that the Orders are to be made.
 - (c) within 14 days of making the Orders publish a notice of making in the local press and write to/email all persons/organisations who have made representations to notify them of the making of the Order and where persons have objected to the proposals and the objection(s) have not been wholly acceded to, include the reasons for the decision to make the Order.
 - (d) remove the notices of proposal displayed on site and replace with notices of making.
 - (e) deposit the notice of making and the made Orders at the Civic Centre and at all local libraries for a period of 6 weeks.

(f) the Orders would come into force after the 6 weeks' legal challenge period.

(g) remove the on-site notices of making.

8.25. The process of making and implementing the TMOs will likely take up to 8 weeks from the date of final decision.

9. Human rights, equalities and community cohesion

9.1. The EIA is attached as Appendix 2

9.2. The EIA sets out the overarching aims objectives and desired outcome of the proposal and their contribution to the council's corporate priorities. It also includes a detailed background on who will be affected by this proposal and the evidence the council has considered as part of its assessment.

- The draft EA draws up a list of areas of concern and ways to remove or minimise negative impact/discrimination
- To consult appropriate stakeholders as part of the review. Formulate an action plan to tackle issues arising from the EA.
- A copy of the outcome of the EA will be published on the councils' website.
- The EA Plan will be reviewed in 12 months' time, notwithstanding this, it should be noted that if approved, the policy would be kept under review and representatives of the affected groups would be consulted with to assess ongoing impact and consider further mitigation. Adjustments would be brought forward for Members' consideration as appropriate.

10. Equality Groups

10.1. Advice will be sought on the appropriate equality groups with protected characteristics, relevant to this proposal, in order to consult with directly to seek view and opinions.

- 10.2. In addition, a copy of the consultation documentation will be sent to Merton Voluntary Sector Council act (MVSC) who in themselves have direct links to over 800 voluntary groups and organisations in Merton.

11. Crime and Disorder implications

- 11.1. None

12. Risk management and health and safety implications

- 12.1. There are no health and safety implications associated with this report at present.

Appendix 1

The London Borough of Lambeth issue PCNs under both Band A and Band B charges. Band A charges apply to all roads north of the A205 and all roads in CPZs. Band B charges are those roads south of the A205 and not in a CPZ.

The following roads are shared with, or adjoin the border between the London Borough of Merton and the London Borough of Lambeth;

Allen Close, CR4	- Adjoining road
Briggs Close, CR4	- Adjoining road
Greyhound Terrace, SW16	- Adjoining road
Grove Road, CR4	- Adjoining road
Lacrosse Way, SW16	- Adjoining road
Leonard Road, SW16	- Adjoining road

The London Borough of Wandsworth issue PCNs under both Band A and Band B charges. Band A charges apply to the north of the borough bounded by the A205 and the A3. Band B charges apply to the remainder of the borough.

The following roads are shared with, or adjoin the border between the London Borough of Merton and the London Borough of Wandsworth;

Bathgate Road, SW19	- Shared road
Church Road, SW19	- Adjoining road
Eastbourne Road, SW16	- Shared road
London Road, SW16 (A217)	- Shared road
Parkside, SW19 (A219)	- Shared road
Plough Lane, SW17	- Adjoining road
Queensmere Road, SW19	- Shared road
Revelstoke Road, SW18	- Shared road
Seely Road, SW16	- Adjoining road

The London Borough of Croydon issue PCNs under both Band A and Band B charges. Band A charges apply to all roads within the borough, with the exception of roads that are a boundary road with a neighbouring borough, and Band B charges apply to these roads only.

The following roads are shared with, or adjoin the border between the London Borough of Merton and the London Borough of Croydon;

Croydon Road, CR4 (A236)	- Adjoining road (clearway)
Galpin's Road, CR4	- Shared road
Northborough Road, SW16	- Shared road
South Lodge Avenue, CR4	- Adjoining road
Stanford Road, SW16	- Shared road
Turtle Road, SW16	- Shared road

The London Borough of Sutton only issue PCNs under Band B charges.

The following roads are shared with, or adjoin the border between the London Borough of Merton and the London Borough of Sutton;

Beddington Lane, CR4	- Shared road
Bishopford Road, SM4 (A217)	- Shared road
Carshalton Road, CR4 (A237)	- Adjoining road
Love Lane, SM4	- Shared road
Garth Road, SM4	- Adjoining road
Goat Road, CR4	- Shared road
Green Lane, SM4	- Shared road
Kingsbridge Road, SM4	- Adjoining road
Lower Morden Lane, SM4	- Adjoining road
Malmesbury Road, SM4	- Shared road
Middleton Road, SM4	- Shared road
Netley Road, SM4	- Adjoining road
Newhouse Walk, SM4	- Adjoining road
Newminster Road, SM4	- Adjoining road
Nova Mews, SM4	- Adjoining road
Stonecott Hill, SM4 (A24)	- Shared road (Red Route)
Tudor Drive, SM4	- Adjoining road
Wates Way, CR4	- Adjoining road

The Royal Borough of Kingston upon Thames only issue PCNs under Band B charges.

The following roads are shared with, or adjoin the border between the London Borough of Merton and the Royal Borough of Kingston upon Thames;

Blakes Lane, KT3	- Adjoining road
Burlington Road, KT3	- Shared road