



**Decision maker:** Tony Singh, Head of Highways



**Date:** 14<sup>th</sup> July 2025

**Subject:** Stop and Shop+ Parking Scheme – Consultation Recommendations

**Report of:** Tom Gallagher, Head of Parking (Interim)

**Report author:** Tom Gallagher, Head of Parking (Interim)

**Responsible Director:** Earl McKenzie, Assistant Director (Street Services)

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## SUMMARY

Between the 23<sup>rd</sup> April and 14<sup>th</sup> May 2025 the Council undertook a statutory consultation on proposals to convert the remaining short-stay free “Stop & Shop” bays to 30-minute free-then-pay S&S+ bays (plus ancillary cashless and shared-use bays).

Following this statutory consultation, 791 unique responses were received, once duplicates were removed, representing 0.26% of Ealing's population (16+). Of those, 66% originated within the borough boundary. Spatial analysis shows the highest concentration of comments came from the Pitshanger ward. Across the 791 unique responses, there were 12% in favour, or supportive of the proposals, 82% opposed, and 6% neutral or seeking more information.

The top concerns were potential impacts on local businesses (73% of responses), and the perceived exclusion of digitally disadvantaged users (31%). A kerbside activity study at 19 locations revealed significant misuse of the existing free bays, with non-compliance rates reaching 65% in some locations. The concentrated response patterns from W5 postcodes (particularly Pitshanger Lane) suggest organized local campaigns rather than borough-wide opposition.

74 respondents identified themselves as business respondents, which is 9% of the total responses. Of these, 10 (14%) expressed support, 60 (81%) objected and 4 (5%) were neutral.

While legitimate concerns about digital exclusion and vulnerable users require mitigation measures, these can be addressed through phased implementation and appropriate alternatives without undermining the policy objectives.

Having examined the consultation feedback, the traffic data and relevant policy objectives, I am satisfied that the S&S+ scheme (as already designed) remains the most proportionate, enforceable and strategically aligned solution. I therefore recommend that we proceed to implementation without material alteration.

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## RECOMMENDATIONS

1. To acknowledge the consultation response analysis, which shows showing 791 responses with key concerns around business impact (73%), vulnerable users (35%) and digital exclusion (31%).
2. Approve implementation of the Stop & Shop+ scheme, including associated cashless and shared-use conversions, exactly as advertised during the statutory consultation.
3. To implement appropriate mitigation measures including non-digital alternatives and methods for vulnerable users, and include transition periods of non-enforcement after implementation.

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## Wards Affected: All

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Strategic Objectives	Summary of how this report aligns to the <a href="#">Ealing Council Plan 2022 - 2026</a> and Ealing's strategic objectives.
Creating Good Jobs	<i>The scheme aims to increase parking turnover supporting local businesses by ensuring customer access. Current non-compliance reduces available parking for shoppers. Improved turnover will support high street vitality and business sustainability.</i>
Tackling the Climate Crisis	<i>Addresses transport emissions (32% of borough CO2) by encouraging active travel for short trips. Proper enforcement of time limits reduces circling for parking spaces and associated emissions. Supports modal shift objectives in Climate Strategy.</i>
Fighting Inequality	<i>Requires careful implementation to avoid digital exclusion. Mitigation measures will ensure vulnerable groups maintain access. Revenue can support improved public realm and active travel infrastructure benefiting all residents.</i>

## Proposals and analysis of options

1. The proposals involve converting 710 existing free Stop and Shop parking bays (about 1,742 bays) across Ealing into three categories: Stop and Shop+ (343 locations), shared use bays (267 locations), and cashless parking bays (100

locations). Stop and Shop+ will offer a single, borough-wide offer of 30 minutes' free parking. With drivers now being required to register their stay via the PayByPhone app, or via a phone line, or via one of 197 PayPoints across the Borough. Drivers' will have the option to pay for additional time beyond the free period at the normal cashless tariffs. This replaces the current inconsistent system where free parking ranges from 30 minutes to 3 hours with varying return restrictions and minimal enforcement capability. Drivers now must also register for their initial free 30-minute parking session, thus enabling Officers to distinguish legitimate short stops from overstays and thus protecting bay turn over. Kerb-side surveys show that where no registration was required under the previous rules of this scheme, that the average dwell time of a vehicle exceeded the posted limits by up to 60%, leading to chronic bay saturation in some areas. This undermines the Stop & Scheme altogether.

2. Additionally, approximately 400 existing permit-only spaces will be converted to shared use bays, allowing both permit holders and pay-by-phone users to park, increasing flexibility particularly in underutilized locations. The changes aim to improve parking turnover, support local businesses, enable effective enforcement, and encourage modal shift to active travel while maintaining a consistent borough-wide approach to kerbside management. This is achieved also without altering kerb-space or carriageway layout.
3. The consultation generated 791 unique valid responses after removing 63 duplicates from 854 total submissions. This represents 0.2% of Ealing's population which sits within the expected range for large catchment consultations locally and nationally.

## Options

4. **Option A** - Implement S&S+. Provides borough-wide consistency, protects short-stay turnover, enables targeted enforcement and aligns with policy goals.  
**RECOMMENDED**
5. Option B - Retain status quo. Fails to address high non-compliance, inequitable bay distribution and enforcement inefficiencies.
6. Option C - Redesign scheme (*e.g., extend free period*). This overlooks that the consultation objections were thematic rather than technical; extending free time would perpetuate stay-length mismatch.

## Analysis of Consultation Themes

7. Geographic analysis reveals concentrated response patterns with W5 postcodes generating 42% of all Ealing responses. Pitshanger Lane (W5 1QX/1QY) alone generated 30 responses suggesting organized local campaigns. Areas with established shopping parades generated 3-4 times more responses than residential zones.

8. Business impact concerns dominated responses at 73% (573 responses). These clustered around established shopping parades - Pitshanger Lane (30), Lindfield Road (16), Barnfield Road (10). Concerns focused on reduced elderly customers, decreased spontaneous shopping and complexity deterring trade. However, the kerbside activity study provides compelling evidence for change. Non-compliance rates vary from 2.84% (Bilton Road) to 65% (Wadsworth Road) with 9 of 19 locations showing rates above 25%. Average parking durations in 30-minute bays range from 2-4 hours representing 400-800% overstay rates. This underscores the need for consistent controls.
9. Digital exclusion concerns appeared in 31% of responses (244) with even distribution across the borough suggesting universal rather than localized concern. Issues include no smartphone ownership, no internet access, no bank account for app registration and poor mobile signal coverage.
10. Vulnerable user impacts featured in 35% of responses (273) with highest concentrations in wards with older demographic profiles. Cleveland ward showed 22% of local responses mentioning this theme. Specific concerns covered elderly residents without smartphones, disabled users needing longer parking times and carers requiring flexibility.
11. Legitimate technical issues include PayByPhone reliability (178 responses citing 12% call failure rates in other boroughs), 30-minute limits being insufficient (140 responses supported by 47-minute average transaction times) and first-time registration friction (69 responses noting 8-minute average setup).
12. Context is required for some concerns. Revenue generation claims (126 responses) should note projected £305k represents only 0.8% of £36m parking budget. Consultation process concerns (183 responses) should recognize statutory requirements were met. Claims the current system works (242 responses) are contradicted by non-compliance data.

## Reasons for decision

13. The evidence strongly supports proceeding with Stop and Shop+ implementation. Current non-compliance rates up to 65% demonstrate system breakdown. The scheme directly supports council objectives on emissions reduction, active travel promotion and high street vitality. Consultation concerns while valid are manageable through appropriate mitigation without undermining core policy objectives.

Please see in the appendix below **Table A**, which provides a summary of all the 27 key themes identified from the consultation responses, along with the Council's formal response and rationale for each.

## Financial impact

14. The projected annual income of £305k is based on 15% paid usage rate, £1.20 average transaction value and 250 operational days. Implementation costs of £113k include TRO advertising (£2k) and signage (£111k).
15. Revenue projections should be considered conservative given uncertainty around behavioural change and displacement effects. Based on comparable schemes, realistic projections suggest Year 1: £142,500 (approx.), Year 2: £305,000 (approx.).

Table 1: Revenue implications

Income	2025/26	2026/27
Conversion of free bays to Stop & Shop+ / cashless / shared-use	£82,500	£180,000
Additional paid for parking after initial free 30-min session	£24,000	£50,000
Conversion of permit bays to shared use	£36,000	£75,000
<b>Total</b>	<b>£142,500*</b>	<b>£305,000**</b>

\*Income for September 2025 – March 2026

\*Income for April 2026 to March 2027

16. The total costs of implementing these changes will be £113,000, which will include £2,000 for the drafting and publishing of the Traffic Management Orders, and £111,000 for installing the new regulatory signage. There are no on-going costs associated with this above and beyond the normal costs of highways maintenance and upkeep.

## Legal Implications

17. The Traffic Management Act 2004 places duties on local authorities to manage road networks securing expeditious movement of traffic. The Road Traffic Regulation Act 1984 provides powers to create and modify parking restrictions through Traffic Regulation Orders.
18. Statutory consultation requirements under the Local Authorities Traffic Orders (Procedure) (England and Wales) Regulations 1996 have been met with 21-day consultation period exceeded. The Equality Act 2010 requires consideration of impacts on protected characteristics which has been addressed through equality impact assessment.

## **Equality implications**

19. An equality impact assessment identifies potential indirect discrimination through digital requirements affecting age (smartphone ownership drops from 95% under-55 to 65% over-70) and disability (23% lack internet access vs 11% general population).
20. Mitigation measures including non-digital alternatives, such as option to use a telephone number and make a phone call to register a parking session or using a physical PayPoint (197 across the Borough), initial grace periods without enforcement, will address these impacts. Regular monitoring of usage by protected characteristics will ensure ongoing compliance with Public Sector Equality Duty.
21. The rights of blue badge holders are completely unaffected by these changes and they can park in Stop & Shop+ bays for an unrestricted amount of time and without needing to register their vehicle.
22. As part of our commitment to inclusive policy development, officers engaged with both the Ealing Older People's Partnership Board and the Ealing Disability Equality Partnership Board during the development of the Stop & Shop+ proposals. These discussions provided valuable insight into the potential impacts on elderly and disabled residents, particularly around digital access and mobility needs. Feedback from these sessions directly informed the inclusion of non-digital registration options and the exemption of Blue Badge holders from registration requirements.
23. To assess the potential impact of the Stop & Shop+ changes on local businesses, officers held discussions with representatives from Ealing's Business Improvement Districts (BIDs). These conversations helped shape our understanding of business concerns around customer access, parking turnover, and operational flexibility. The feedback received was considered in the final design of the scheme, including the retention of a 30-minute free period and the introduction of consistent, enforceable bay management to support high street vitality.

## **Risk Management Implications**

24. Key risks include reputational damage from perceived discrimination, legal challenge on equality grounds and operational failure of payment systems. These are mitigated through comprehensive alternatives, phased implementation and robust testing protocols.

## **Climate and Sustainability Implications**

25. The scheme supports climate objectives by encouraging modal shift for short journeys, reducing circling for parking spaces and associated emissions.

Improved turnover reduces vehicle movements and supports 15-minute neighbourhood concepts.

Consultation

- 26. Statutory consultation ran from the 23<sup>rd</sup> April to 14 May 2025, fulfilled the 21-day requirement. Responses were received via email (791) with analysis showing geographic clustering and thematic concerns. Business representatives were engaged through direct meetings.
- 27. While 23% cited inadequate consultation, the process met all statutory requirements and achieved higher than typical response rates for parking consultations. Late submission patterns (78% in final week) suggest awareness building throughout period.

Report Author: Tom Gallagher (Head of Parking Interim)

Appendix

Table A

Themes from the Stop and Shop+ Parking Bays Consultation		Council Response and Rationale
These proposals will negatively impact local businesses in the area	73% (573)	Requiring registration for the free period enables enforcement and improves bay turnover, ensuring more customers can access shops throughout the day.
These proposals are not considerate of disabled, elderly and/or vulnerable motor vehicle users	35% (273)	Non-digital options and exempted Blue Badge holders to ensure the scheme remains accessible to all users.
Stop and Shop+ parking spaces are discriminatory and exclude those who are not IT literate and/or have no access to digital devices/services	31% (244)	The scheme includes three registration methods—app, phone, and PayPoint—to ensure full accessibility regardless of digital access.
The current parking system works well and should not be changed	31% (242)	Kerbside studies show widespread non-compliance under the current system, which the new scheme addresses through enforceable consistency.
There was a lack of meaningful consultation in	23% (183)	The consultation met all statutory requirements and received a strong

relation to Stop and Shop+ parking proposals		response rate, with all feedback reviewed and addressed.
PaybyPhone services are inconvenient and unreliable for users	23% (178)	Alternatives to PayByPhone, including a phone line and PayPoints, ensure users can register without relying on a smartphone or app.
These proposals will negatively impact parking availability in the area	19% (148)	The scheme improves availability by reducing long-term overstay and increasing bay turnover.
30 minutes is not enough time to carry out essential tasks in the area	18% (140)	The 30-minute free period supports quick visits, with the option to extend stays at standard rates for longer tasks.
These proposals are a revenue generating scheme for Ealing Council	16% (126)	Revenue is not the driver; the scheme supports better bay management and any income is reinvested into local transport improvements.
30 minutes is not enough time for vital leisure/social activities	10% (79)	Users can extend their stay beyond the free period, ensuring flexibility for longer visits while maintaining bay availability.
Stop and Shop+ parking spaces are not entirely free due to a 20p first-time registration charge	9% (69)	The 20p fee is a one-time charge for your very first registration. After that, all future 30-minute free parking sessions are completely free—no additional 20p fees.
Suggestions on enforcement and whether the impact of any changes will be reviewed after implementation	7% (57)	A grace period will follow implementation to allow users to adjust. The scheme will be continuously monitored, with a formal review after 12 months.
These proposals are not supported by meaningful evidence or data analysis	5% (39)	The scheme is based on kerbside studies showing high non-compliance and overstay rates, justifying the need for change.
General Opposition to the Stop and Shop+ parking proposals	4% (35)	While opposition is noted, the scheme addresses systemic issues and includes safeguards for vulnerable and digitally excluded users.
Stop and Shop+ parking should have a minimum of 1-hour free parking	4% (29)	A longer free period would reduce turnover and availability; 30 minutes balances access with effective bay management.
These proposals discriminate against low-income households who cannot afford paid-for-parking	3% (24)	The scheme provides 30 minutes of free parking to all users, with no digital or financial barriers to access.
Questions concerning the proposals	3% (20)	All questions have been reviewed and answered in a comprehensive Q&A to ensure clarity and transparency.
These proposals will not be beneficial to the Council's environmental goals	2% (16)	The scheme reduces circling for parking and supports modal shift, aligning with Ealing's Climate Strategy.



These proposals are not considerate visitors and/or carers in the area	2% (14)	Visitors and carers can use the free period and extend their stay, with further support options under review.
Concerns over data-retention policies of PaybyPhone parking services	2% (13)	PayByPhone is GDPR-compliant and data is retained only for operational and legal purposes.
These proposals will increase motor vehicle traffic and pollution in the area	2% (12)	By reducing time spent searching for parking, the scheme helps lower emissions and supports sustainability.
Comments that do not concern the proposal in question	1% (9)	These have been noted and referred to the appropriate teams where relevant.
These proposals will negatively impact motor vehicle journey lengths in the area	1% (6)	Improved bay availability is expected to reduce journey times by minimising time spent searching for parking.
These proposals will improve active travel and community spaces in the area	1% (6)	The scheme supports short-stay parking and modal shift, contributing to more walkable, community-friendly streets.
These proposals will negatively impact road safety for pedestrians in the area	2% (5)	No changes are being made to kerb layouts, and improved enforcement may enhance pedestrian safety.
These proposals will help reduce car dependencies for short journeys in the area	1% (4)	Encouraging short stays and turnover supports walking and cycling for local trips.
These proposals will improve motor vehicle turnover rates in parking bays	0.4% (3)	Yes—this is a core objective of the scheme, enabled by the requirement to register even for free stays.