**Public Document Pack** 



# ADVANCE PUBLICATION OF REPORTS

This publication gives five clear working days' notice of the decisions listed below.

These decisions are due to be signed by individual Cabinet Members and operational key decision makers.

Once signed all decisions will be published on the Council's Publication of Decisions List.

1. FUTURE APPROACH TO CONTROLLED PARKING ZONES (Pages 1 - 38)

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# London Borough of Enfield

Report Title	Future Approach to Controlled Parking Zones
Report to:	Cllr Rick Jewell, Cabinet Member for Environment
Date of Report:	January 2024
Directors:	Doug Wilkinson, Director of Environment & Street Scene
	Simon Pollock, Executive Director of Environment & Communities
Report Author:	David Taylor, david.b.taylor@enfield.gov.uk
Ward(s) affected:	All
Key Decision Number	KD 5545
Implementation date, if not called in:	January 2024
Classification:	Part I

# Purpose of Report

 The report sets out the Council's current approach as a Highway and Traffic Authority to Controlled Parking Zones (CPZs), summarises the latest policy context, considers the role that CPZs could play in helping to meet both transport and growth objectives; and sets out a new approach to CPZ delivery in the Borough to achieve this.

#### Recommendations

The Cabinet Member for Environment:

- I. Approves the new approach to Controlled Parking Zones across the borough as set out in this report.
- II. Delegates authority to the Director of Environment and Street Scene, in consultation with the Cabinet Member for Environment, to finalise and adjust the programme of CPZ schemes in 2023/24 and future years, taking into account the criteria set out in paragraph 18 of the report.
- III. Approves to the tender for specialist consultancy support to assist with the delivery of the programme of CPZ schemes and delegates the award of the contract to the Director of Environment and Street Scene following evaluation of the tenders in line with procurement procedures.

### **Background and Options**

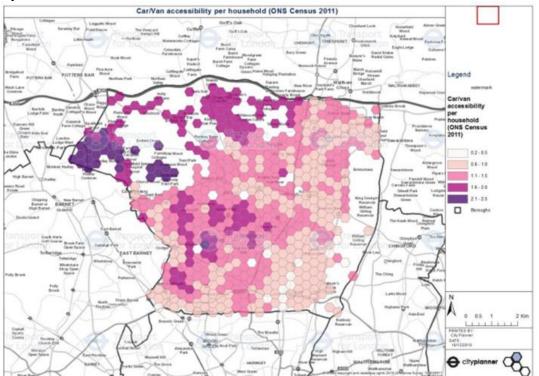
#### Car Ownership

2. The 2021 Census data on cars available to households indicates that car ownership levels in Enfield are similar to those found elsewhere in Outer London:

Number of households with:	LBE No.	LBE %	Outer London %	London %	England %
No cars or vans	37,517	31.0	31.7	42.1	23.3
1 car or van	53,617	44.3	44.2	40.3	41.3
2 cars of vans	22,358	18.5	18.3	13.6	26.2
3 or more cars or vans	7,432	6.1	5.8	4.0	9.2

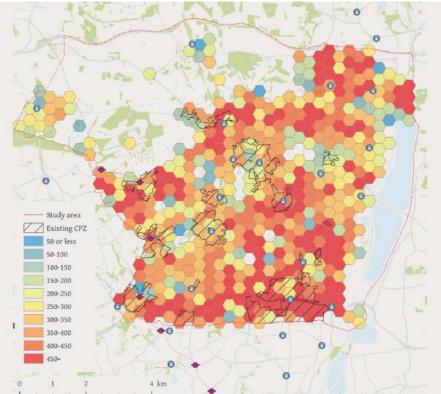
3. The spatial distribution of access to cars/vans varies across the borough, these being generally higher on the western and northern parts of the Borough, as shown in the image below:





#### Spatial distribution of access to cars/vans

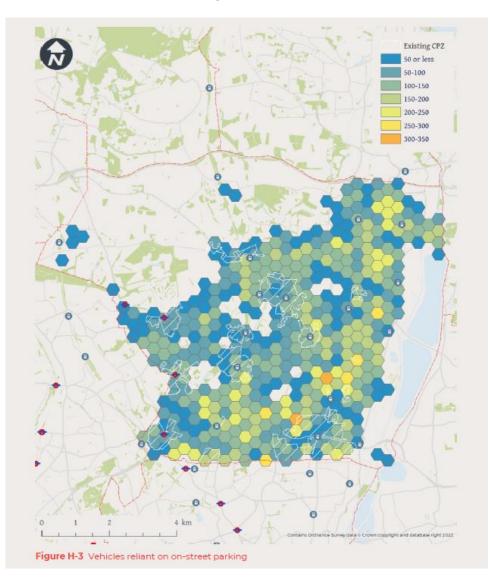
4. However, because population densities are generally higher on the eastern side of the borough, the actual number of cars in each specified area (or 'hex cell') can be higher in the east and southern of the borough, as illustrated on the image below.



Spatial distribution of vehicle densities

5. With the housing stock being different across the Borough, there are also some areas much more dependent on on-street parking than others, as illustrated in the image below. As would be expected, those areas with a greater proportion of terraced housing and flats are more reliant on on-street parking than more suburban parts of the borough.

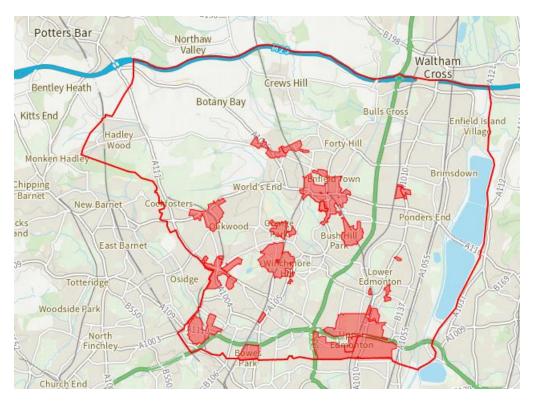
#### **Reliance on On-Street Parking**



#### **Controlled Parking Zones**

- 6. A controlled parking zone is an area where on-street parking is restricted during specified times. The controlled hours are shown on entry signs, with bays marked within the zone to show where parking is permitted and yellow lines to show where it is not. Permits are required to park within the designated bays and are available for residents within the zone, as well as their visitors and carers. In some cases, permits are also available for businesses with the zone.
- 7. There are a number of variations to CPZs, including Restricted Parking Zones and Permit Parking Areas. All are based on some form of zonal control, with a permit needed to park during the restricted hours.

8. Currently, approximately 15% of the borough is covered by a CPZ, as shown on the image below. These are mainly focussed around town centres and other major trip attractors (such as hospitals) and rail and underground stations.



- 9. Generally, the existing CPZs fall into one of two broad categories, either 'all-day' controls around town centres or hospitals etc, or 'part-day' controls, typically designed to deter commuter parking around stations. The zones have grown organically over a number of years, driven in large part by requests from residents. As a result, the restrictions cover a wide variety of different days and time periods.
- 10. CPZs can be seen to offer a number of advantages and disadvantages which have to be taken into account along with wider strategic objectives with our duty as a traffic authority and managing both network and kerbside space:

Advantages of CPZ:

- Prevents all-day commuter parking.
- Reduces the number of abandoned vehicles.
- Improves access for vehicles especially emergency service and refuse vehicles.
- Improves highway safety and reduces inconsiderate and indiscriminate parking.
- Reduces number of vehicles circulating the area looking for parking space, leading to a reduction in congestion, noise and air pollution.
- Generally, improves parking conditions for the community.
- Encourages the use of vehicles that produce lower emissions.
- Can facilitate higher density 'car lite' or car free housing whilst protecting the amenity of existing residents.

Disadvantages of CPZ:

- Possible displacement of parking to nearby uncontrolled roads.
- Having to pay for a parking permit.
- Additional post and signs can add to 'street clutter'.
- Can nominally reduce on-street parking space by removing parking from corners and pinch-points.
- Does not guarantee a parking space to permit holders.

• Might encourage more to convert front gardens to parking areas.

# **Current Approach to CPZs**

- 11. The current CPZs in the borough have been implemented organically over many years, largely in response to requests from residents. This has resulted in a haphazard range of schemes, operating different days and hours. The current CPZs in the Borough are listed in Appendix 2, together with their hours of operation.
- 12. In 2015, the Council reviewed its process for implementing CPZs and put in place a 3 stage approach to consultation, normally triggered by a petition signed by at least 50% of the affected properties. A copy of the consultation 'charter' is included at Appendix 3.
- 13. The approach was intended to ensure that schemes were only taken forward where there was clear local support. However, this approach has proved cumbersome, often taking over 12-18 months from start to finish. It is also resource intensive due to the repeated public engagement involved. In many cases, it has also proved difficult for residents to achieve the desired outcome due to poor or low numbers of response rates.
- 14. Additionally, this approach to introducing new CPZs gave only limited weight to the Council's Network Management Duty and, in particular, our duty as the local Highway and Traffic Authority to actively manage kerb space in the interests of all road users.

### **Policy Context**

- 15. Historically, most boroughs (including Enfield) have treated parking provision mainly as an amenity for residents rather than a policy tool to help achieve wider strategic goals. However, Boroughs have an obligation to produce local transport strategies demonstrating how they will deliver the strategic objectives of the Mayor's Transport Strategy, including mode shift targets, improved air quality, Healthy Streets and carbon reduction targets.
- 16. Whilst residents' amenity is still an important consideration, it is clear that CPZs can play a part in managing car ownership and usage where roadside space is limited as well as supporting the delivery of healthy, quality public places. In addition, the effective management of kerb-side parking can also play any important part in supporting growth by ensuring that the impact of new, higher density residential development can be supported.
- 17. As summarised below, there have been significant developments in respect of the approach to private vehicle ownership in London as set out in local, regional and national planning and transport policies:

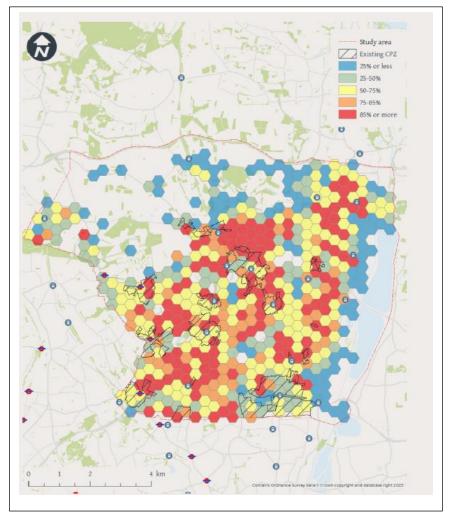
London Plan (2021)	The current London Plan includes policies relating to the management of car parking demand to encourage a shift to more sustainable modes. The Plan goes on to set out how private vehicle ownership should be addressed in spatial planning, by making it clear that low or car free development should be the norm and setting lower maximum car parking standards (fewer if any spaces) for new developments.
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Mayor of London's Transport Strategy (2018)	Given London's forecast population and employment growth, the Mayor's Transport Strategy makes it clear that, in order to deliver this sustainably, the use of active and sustainable transport must be increased and overdependence on private vehicles reduced. One of the measures to achieve this is the prioritising of finite road and kerbside space for the most space efficient modes of transport (with private vehicles being the least efficient). CPZs therefore have an important part to play in contributing to the Mayor's overarching target for 80% of trips to be made by walking, cycling or public transport by 2041.
Enfield Transport Plan (2019)	The policies, programmes and initiatives within the plan aim to improve the ease in which we travel in the borough, encouraging sustainable and active travel to help manage environmental problems related to congestion, local air quality, reduce our impact on climate change and improve health, safety and accessibility. The plan identifies how we will work towards achieving this through the seven transport objectives, including:
	• Manage growing demand for on-street parking, recognising that there is simply not enough road space to safely and efficiently accommodate everyone who wishes to park or drive in Enfield today or in the future.
Climate Action Plan (2020)	The need for urgent action to address climate change has been recognised, with Enfield declaring a Climate Change Emergency in July 2019 and adopting a Climate Action Plan in September 2020. Given that transport contributes around 39% of the Enfield's borough wide energy emissions, taking action in this area must be part of the Council's response.
	The plan sets out a number of actions including:
	<ul> <li>Limit the provision of car parking spaces on new developments in line with the New London Plan and better manage existing kerbside space.</li> </ul>
Air Quality Action Plan (2022)	<ul> <li>A number of air quality priorities are identified:</li> <li>make active travel the natural choice, particularly for those trips less than 2km (1.2 miles)</li> <li>make more school trips safe, sustainable and healthy</li> <li>reduce the impact of private vehicles on our streets (through a reduction in emissions)</li> <li>make the public transport network more accessible and the natural choice for longer trips</li> <li>reduce emissions from both existing buildings and new development.</li> </ul>

These priorities are supported by a number of actions,
including by managing growing demand for on-street
parking.

### **Proposed Future Approach to CPZs**

- 18. In view of the strong policy support for CPZs and the wider benefits that they can deliver, it is proposed to put in place a more strategic approach with new criteria to help guide and manage the prioritising of finite road and kerbside space and the delivery of future CPZs. Rather than solely responding to requests from residents, it is instead proposed that a CPZ would be positively considered in any of the following circumstances:
  - a) Where there is an outstanding commitment to take forward a CPZ, as listed in Appendix 1.
  - b) Where a CPZ would help achieve a mode shift in favour of active travel and/or public transport, either on its own or as part of a wider package of measures
  - c) Where a CPZ would facilitate the delivery of new housing or employment.
  - d) Where a CPZ would help address an existing parking problem, where on-street parking stress exceeds 85%. This is assessed by calculating the demand for



kerbside space as a percentage of supply and is indicated in red on the plan above.

19. Based on the policy context within this report and the data and information already available, Appendix 1 sets out a draft programme of CPZ implementation for 24/25, reflecting schemes already in development, where commitments have been given, or where one or more of the new criteria are met. It is recommended that finalisation of the 24/25 CPZ programme be delegated to the Director of Environment and Street Scene taking into account both the level of funding available and the resources available to deliver the programme.

- 20. To drive forward the delivery of the programme, external support will be required to assist with the design and consultation of the various schemes. The ESPO Framework has been identified as a suitable procurement route and work is underway with both the Council's Procurement and Legal Teams so that the framework can be used to deliver best value.
- 21. A future programme of schemes for 2025/26 and beyond would be delegated to the Director of Environment and Street Scene, in consultation with the Cabinet Member for Environment and again, taking into account the criteria set out in paragraph 18 above.
- 22. Consultation with residents and businesses will remain a key part of the process, helping to inform the development of schemes and to shape detailed designs. As schemes progress, further engagement will also take place as part of the statutory traffic order making process.

#### **Preferred Option and Reasons For Preferred Option**

- 23. A number of options have been considered relating to future CPZs, including maintaining the current reactive, resident-led approach. Whilst this approach has been reasonably effective in addressing residents' concerns about parking in their local area, the haphazard approach has only partially enabled the Council to deliver on the more strategic objectives of wider policies.
- 24. The preferred option is therefore to take a more pro-active strategic and coordinated approach to future CPZs, recognising that the Council has a duty as a Highway and Traffic Authority to effectively manage kerbside space and a responsibility to deliver longer-term local, regional and national policy objectives.

### **Relevance to Council Plans and Strategies**

- 25. The proposals will support the following Council priorities:
  - Clean and Green Spaces by helping to reduce harmful emissions and encourage walking, cycling and public transport.
  - Strong, healthy and safe communities by helping to encourage active travel, particularly for short journeys.
  - More and Better Homes by helping to enable higher density, low car generating development.
- 26. Improved management of the kerbside parking also supports the following Council strategies:
  - Climate Action Plan.
  - Air Quality Action Plan.
  - Local Plan.
  - Enfield Transport Plan.
  - Healthy Streets.
  - Vision Zero.

### **Financial Implications**

- 27. The proposed schemes are wholly funded from existing funding sources as set out in the table below.
- 28. The actual scope and financial implications of each scheme will be subject to the review/adjustments/approval by the Director of Environment and Street Scene in consultation with the Cabinet Member for Environment, taking into account the criteria set out in paragraph 18 of the report.

Cashflow (incl. risk and inflation)				
Phase	Scheme Name	2023/24 £000s	2024/25 £000s	Net 2023/24 & 2024/25 £000s
1	Arnos Grove CPZ	-£68	£8	-£60
1	Bounds Green CPZ	£0	£31	£31
1	Bowes East CPZ	-£20	-£43	-£63
1	Windsor & Osborne CPZ	£0	£49	£49
1	Meridian Water CPZ	-£70	£131	£61
1	Edmonton Green Extension	-£75	£342	£267
1	Alma CPZ	-£68	£14	-£54
1	Electric Quarter CPZ	-£70	£16	-£54
1	Bush Hill CPZ Extension	£0	£67	£67
1	Enfield Town CPZ Extension	£0	£46	£46
1	Cockfosters CPZ	£0	£17	£17
1	New Avenue CPZ	-£75	-£10	-£85
1	Winchmore Hill CPZ Extension	-£20	£15	-£5
2	Silver St / Joyce Ave CPZ	£0	£0	£0
2	Brimsdown CPZ	£0	£0	£0
2	Chase Side CPZ	£0	£0	£0
2	Palmers Green CPZ	£0	£0	£0
2	Hadley Wood CPZ	£0	£0	£0
2	Enfield Lock CPZ	£0	£0	£0
2	Turkey Street CPZ	£0	£0	£0
Total		-£465	£683	£217
		Includes £460k income (S106)		Funding gap £217k

Other Funding Sources (to meet the £217k budget gap)			
1) Parking Development Fund	l Reserve £102k		-£103
2) TFL Grant Claim TBC £100k		-£100	
3) Revenue (Parking Services)		-£14	
Total		-£217	
Funding gap			£0

#### Legal Implications

- 29. By virtue of the Road Traffic Regulation Act 1984 Section 122 the Council has a duty to secure the provision of suitable and adequate parking facilities on and off the highway.
- 30. Using powers provided by Section 45(1) and (2) (b) a local authority may by order make and prescribe charges for vehicles left in designated parking places and in connection with the issue of a permit. Section 46 prescribes that charges shall be made by an order of the Council and Section 46A allows such charges may be varied by notice. The procedure for varying charges pursuant to Section 46A is set out in Regulation 25 of the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996.
- 31. The recommendations set out in this report aim to assist with the Council's network management duty under section 16 of the Traffic Management Act 2004 ("the 2004 Act") mentioned already elsewhere in this report
- 32. The making of charging tariffs must be concerned with the expeditious, convenient and safe movement of traffic and the provision of suitable and adequate parking facilities on and off the highway. The permit charges will generate revenue, but the charging level must not be set with a view to making a surplus. Any surplus that is generated can only be used for the specific purposes set out in Section 55 of the Road Traffic Regulation Act 1984.
- 33. Regard must be had to the Council's public sector equality duty and the impact of the proposals on those with different protected characteristics.
- 34. The recommendations set out in this report are within the Council's powers and duties.

#### **Procurement Implications**

- 35. Any procurement must be undertaken in accordance with the Councils Contract Procedure Rules (CPR's) and the Public Contracts Regulations (PCRs) (2015).
- 36. The service is proposing on undertaking a "call-off" via a mini-competition from the ESPO Framework 664\_21 Consultancy Services.
- 37. Due Diligence has been undertaken by Procurement Services on the proposed Framework Agreement.
- 38. The service must ensure by accessing this framework agreement, that the contract is compliant with the defined rules and procedures of the Framework Agreement.
- 39. The service must ensure that authority to procure has been obtained and must be uploaded onto the London Tenders Portal.
- 40. The award of the contract, including evidence of authority to award, promoting to the Councils Contract Register, and the uploading of executed contracts must be undertaken on the London Tenders Portal including future management of the contract.
- 41. The awarded contract must be promoted to Contracts Finder to comply with the Government's transparency requirements.

### Equalities Implications

42. An equality impact assessment of the proposed changes has been carried out and is appended as Appendix 4.

#### **HR and Workforce Implications**

- 43. Additional CPZs have the potential to impact some Council staff how have no alternative but to use a vehicle to carry out their duties. However, staff permits are available for essential car users to mitigate this risk. In addition, the Council is investing in walking and cycling improvements to provide a safe and attractive alternative to car use for some trips.
- 44. In addition, an increase in the number of CPZs will have impact on the resources needed in Parking Services and their enforcement contractor. However, these additional costs will be off-set by the sale of additional permits.

#### **Environmental and Climate Change Implications**

- 45. In terms of the proposals, the need for urgent action to address climate change has been recognised, with Enfield declaring a Climate Change Emergency in July 2019 and adopting a Climate Action Plan in September 2020. Given that transport contributes around 39% of the Enfield's borough wide energy emissions (442 Kilo tonnes of Carbon Dioxide equivalent), taking action in this area must be part of the Council's response.
- 46. Implementing the CPZ proposals will help achieve a number of benefits:
  - a) Will directly encourage private vehicle owners to move to vehicles with smaller engine sizes, emitting lower levels of carbon.
  - b) It could reduce the number of private vehicles owned per household and associated vehicle use, encouraging low or zero carbon modes instead.
  - c) Controlled Parking Zones can also ensure a fairer use of the public realm.

#### **Public Health Implications**

- 47. Transport is one of the fundamental determinants of health; it may be healthdamaging or health promoting. The proposals as outlined here will make transport in Enfield much more health-promoting by reducing transport emissions and the use of private vehicles. This will reduce the health costs of motorised transport and support people to use active travel modes.
- 48. Achieving a modal shift towards active travel will also reduce the health damaging effects of motorised transport e.g. road traffic injuries, air pollution, community segregation and noise. Such is the effect of physical activity upon health that it has been calculated that a modal shift to levels of active transport in The Netherlands would save the NHS £17 billion per year. This would be achieved through savings in treating Type 2 diabetes, heart disease, stroke, some cancers, musculo-skeletal disease and dementia. Improving the walking and cycle infrastructure would also be

likely to positively impact upon health inequalities as income or wealth would become a less significant factor in a person's ability to travel within the borough e.g. access to employment, healthcare, social networks etc.

- 49. Reducing obesity is a priority for Enfield, as outlined in the Borough's Health and Wellbeing Strategy. 61.4% of adults are classified as overweight or obese (ALS, 2016). Data for academic years 2014/15 to 2016/17 shows that the average prevalence of excess weight in year 6 pupils is 41.5%. This is higher than London (37.9%) and England (33.87%) averages. If left unchanged, this will lead to serious health complications later in life, such as diabetes, heart disease and cancers.
- 50. Creating an environment where people actively choose to walk and cycle as part of everyday life can have a significant impact on public health and has the potential to reduce health inequalities. It is an essential component of a strategic approach to increasing physical activity and may be more cost-effective than other initiatives that promote exercise, sport and active leisure pursuits.
- 51. Shifting trips to active and sustainable transport also has the potential to achieve related policy objectives:
  - Supports local businesses and promotes vibrant town centres
  - Provides a high-quality, appealing public realm
  - Reduces road danger and noise
  - Increases the number of people of all ages out on the streets, making public spaces seem more welcoming and providing opportunities for social interaction and children's play
  - Provides an opportunity for everyone, including people with impairments, to exercise and enjoy the outdoor environment.
- 52. Overall, the proposals will encourage sustainable and active travel, helping us to manage environmental problems related to congestion and local air quality, while also reducing our impact on climate change and improve health, safety and accessibility for all in our communities. This supports Public Health's efforts to embed Health in all Policies across the Council.

### **Property Implications**

53. There are no direct property implications arising from the proposals in this report.

#### **Crime and Disorder Implications**

54. The additional patrols by civil enforcement officers associated with CPZs may provide additional reassurance to the public.

#### **Other Implications**

#### a) Network Management

55. The Traffic Management Act 2004 places a duty on the Council to manage its roads. This is partly about dealing efficiently with traffic presented on the network – both now and in the future – and the various activities that are causing or have the potential to cause congestion or disruption to the movement of traffic. However, there are various other ways that this duty can be met, including by the regulation of parking and the introduction of demand management measures to encourage walking, cycling and public transport rather than car use. As part of a package of

#### Page 14

measures, the proposed strategic approach to CPZ's is consistent with this network management duty.

#### b) Council Housing

- 56. Council Housing has historically not enforced parking restrictions on estates, resulting in a range of problems, including parking that obstructs access by emergency and service vehicles, parking on footways and grassed areas and parking being taken up by people not living on the estates.
- 57. The Protection of Freedoms Act 2012 (the PoFA) came into force in October 2012 and made it illegal for landowners (including local authorities) to clamp or tow-away unauthorised vehicles parked on their private land. Whilst the Act gave powers to other landowners to impose conditions (such as time limits and charges) for parking on their land and to have recourse to the keeper of the vehicle for payment of a penalty if the driver cannot be found, this was not extended to local authorities. This prevents local authorities from using the provisions of the PoFA and instead, encourages them enforce parking controls by the issue of Penalty Charge Notices (PCNs) under the Traffic Management Act 2004.
- 58. The Government's position on the need for local authorities to enforce parking controls using the provisions of the Traffic Management Act was further reinforced by Robert Goodwill in September 2014, the then Under Secretary of State for Transport.
- 59. In short, it's only the enforcement, under the Traffic Management Act 2004 of restrictions introduced by a traffic management order, that allows the Council access to DVLA records so that non-payment of a PCN can be recovered from the registered keeper of a vehicle.
- 60. Additional on-street parking controls are likely to affect parking on Council Housing estates and vice-versa. Where impacted, Council Housing estates will therefore be included in proposals for CPZs and estate residents consulted accordingly.

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#### **Appendices**

- 1: Draft CPZ delivery programme 2023/24
- 2: Existing CPZs
- 3: CPZ Consultation Charter
- 4: Equality Impact Assessment

#### **Background Papers**

No background papers have been used in preparation of this report.

#### Departmental reference number: PL2223\_26 Appendix 1

Scheme	Reason
Bowes East	Resident request - complete
Windsor & Osborne	Resident request
Elm Park Road	Resident request
Electric Quarter	Housing growth
Alma Road	Housing growth
Arnos Grove	Housing growth

# Schedule 1: Outstanding CPZ Schemes

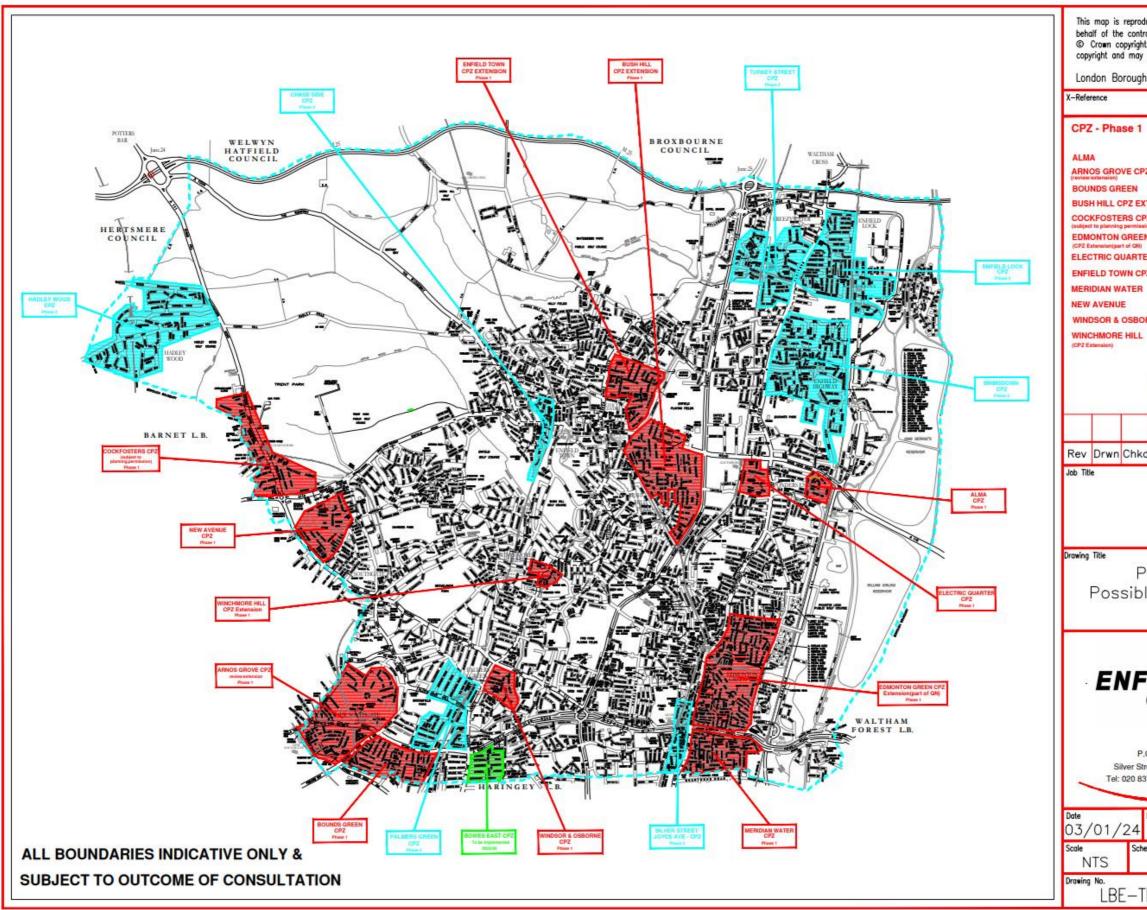
# Schedule 2: New CPZ Schemes

Scheme	Reason
Cockfosters Station	Commuter parking + housing growth + events in Park
Lea Valley Stations	Commuter parking (Enfield Lock, Brimsdown, Ponders End, Meridian Water)
London Overground Stations	Commuter parking (Turkey Street, Southbury, Silver Street + review of existing CPZs)
Great Northern Stations	Commuter parking (Hadley Wood, New Southgate, Palmers Green + review of existing CPZs)
Bounds Green Station	Commuter parking
Enfield Town Extension	Resident request
Bush Hill Park Extension	Resident request
Angel Edmonton (including Joyce & Snells & Raynham Road area)	Town Centre + housing growth
Palmers Green	Town Centre
Edmonton Green	Town Centre + housing growth

# Schedule 3 – Draft Programme

2024/25	2025/26
Arnos Grove	Silver Street/Joyce Avenue
Bounds Green	Brimsdown
Windsor and Osborne	Chase Side
Meridian Water	Palmers Green
Edmonton Green Extension*	Hadley Wood
Alma Estate	Enfield Lock
Electric Quarter	Turkey Street
Bush Hill Extension	
Enfield Town Extension	
Cockfosters*	
New Avenue	
Winchmore Hill Extension	

\*Subject to receipt of s106 funding



This map is reproduced from Ordnance Survey material on behalf of the controller of Her Majesty's Stationary Office © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. London Borough of Enfield LA 086363 2013 None CPZ - Phase 2 ARNOS GROVE CPZ CHASE SIDE ENFIELD LOCK HADLEY WOOD BUSH HILL CPZ EXTENSION PALMERS GREEN COCKFOSTERS CPZ SILVER STREET EDMONTON GREEN TURKEY STREET n(pert of GN) ELECTRIC QUARTER ENFIELD TOWN CPZ EXTENSIO MERIDIAN WATER WINDSOR & OSBORNE WINCHMORE HILL BOWES EAST CPZ To be imp 2023/24 Rev Drwn Chkd Revision Details Date Phasing of Possible Future CPZs ENFIELD Council P.O. Box 52, Civic Centre Silver Street, Enfield, Middx, EN1 3XD. Tel: 020 8379 1000 / Fax: 020 8379 3475 Checked Drawn TS Scheme/File No. Frame Size A3L 

Page 16

# PL2223.26 Appendix 2 – Existing CPZs (excl. Housing Estates)

CPZ	Operational Days/Hours	
Arnos Grove	Mon – Fri 11am – 12pm	
Palmers Green	Mon – Sat 8am – 6.30pm	
Southgate All Day	Mon – Sat 9am – 6.30pm	
Southgate 1 hour	Mon - Fri 11am - noon	
Chase Farm Hospital	Mon – Fri 9am-6.30pm	
Enfield Town (except Sub Zone A)	Mon – Sat 8am-6.30pm	
Enfield Town Sub-Zone A	Mon – Sun 8am-6.30pm	
Grange Park	Mon – Fri 10-11am	
Oakwood	Mon – Fri 2-3pm	
Winchmore Hill	Mon – Fri 10.30-11.30am	
Winchmore Hill (Wilson St Sub-Zone)	Mon – Fri 9am – 6.30pm	
Bush Hill Park	Mon – Fri 1-2pm	
Gordon Hill	Mon – Fri 12-12pm	
Enfield College (Part time)	Mon – Fri 10am-12pm, 2-4pm	
Enfield College (All day)	Mon – Fri 9am – 6.30pm	
Queens Avenue	Mon – Sat 9am – 6.30pm	
Edmonton Green West	Mon – Fri 11am – 12pm	
Edmonton Green East	Mon – Sat 9am – 6.30pm	
Edmonton Green South	Mon – Sun 9am-8pm	
North Middlesex Hospital	Mon - Sat 9am – 8.30pm	
Tramway Avenue	Mon – Sun 8am-10pm	
Bowes Park	Mon – Fri 10am-1pm	
Cedars Road	Mon – Sun 7am-7:30pm	
Manor Road PPA	Mon – Sat 8am-6.30pm	
South Edmonton Event Day	Event Days Noon-9pm	

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## **CPZ Consultation Charter**

#### **Background**

Resident parking schemes or Controlled Parking Zones (CPZ) can help residents and businesses to park near their premises. CPZs tend to be most effective:

- in town centres where there is competition between residents, shoppers and employees for on street space;
- around rail and Underground stations, where there is competition for on-street space between residents and commuters;
- around major trip attractors such as hospitals and sporting venues where there is competition for on-street spaces between residents, commuters and visitors etc.

CPZs work by managing the demand for kerb-side space by defining on-street parking bays for use by specified permit holders, usually either residents or business permits.

Although CPZs can make it easier for residents to park close to their homes, they have a number of disadvantages, including:

- The cost of a permit<sup>1</sup>, which is necessary to cover the administration and enforcement costs associated with a CPZ
- Restrictions need to be introduced in front of dropped kerbs
- Displacing parking to surrounding streets

CPZs are often controversial and residents in the same street will frequently have strongly opposing views. The council's general approach is therefore only to investigate the introduction of a CPZ in the following circumstances:

- Where a CPZ is supported by the majority<sup>2</sup> of people living in an area suffering from high levels of parking stress<sup>3</sup>.
- Where a CPZ has been identified as a necessary measure to protect residents from overspill parking from a new development.
- Where the council is concerned that levels of on-street parking need to be managed in the interests of either road safety or the free flow of traffic.

Even in areas of high parking stress, requests for CPZs will not normally be considered where the majority of residents benefit from off-street parking and the aim is to simply clear streets of unwanted parking.

#### **Consultation**

The consultation area will include not just the area covered by the petition but also the area that could be directly impacted by a CPZ. This is to ensure that the views of those outside the proposed CPZ, who may be affected by displaced parking, are collected as well as those inside the proposed CPZ. Parking surveys will be carried out in order to define the area that could be directly impacted by displaced parking.

<sup>&</sup>lt;sup>1</sup> Information about current permit costs can be downloaded from the council's website at: <u>http://www.enfield.gov.uk/downloads/file/10088/permit\_prices\_based\_on\_co2\_emissions</u>

<sup>&</sup>lt;sup>2</sup> This support needs to be demonstrated using the council's pro-forma, which clearly sets out the advantages and disadvantages of a CPZ. More than 50% of households in the affected street or area must sign the pro-forma before the council commits the necessary resources to investigate the CPZ request

<sup>&</sup>lt;sup>3</sup> As a guide, 'parking stress' tends to occur when the demand for space exceeds 85% of the available number of spaces.

# Page 20

Sometimes proposed CPZs are an extension of an existing CPZ. In these cases households close to the proposed CPZ (say within 50 metres) but within the existing CPZ will be informed of the proposal. However this is only to allow these residents to ask for adjustments to the existing CPZ. Residents who already benefit from a CPZ will not get a vote on deciding if an adjacent area can have a CPZ.

The table over the page sets out our three stage consultation process.

Purpose		Form of Consultation	Threshold to Progress to Next Stage	
Stage 1	<ul> <li>To explore views about current parking issues in the study area and possible solutions</li> <li>To investigate support for the principle of a CPZ, including preferred hours of operation</li> <li>To test whether views in the wider area would change if a CPZ were to be introduced in the 'petition area'</li> </ul>	<ul> <li>Leaflets delivered to all premises in the consultation area</li> <li>At least 21 days will be allowed for responses</li> <li>Responses can be made by post or on-line</li> <li>The consultation will be promoted on the Council's website and by posters displayed on-street throughout the consultation area</li> <li>The results of the consultation will be published on the council's website within 4 weeks of the consultation ending</li> </ul>	Over 50% of responses from within the proposed CPZ must support the idea of a CPZ, based on a response rate of at least 40%. Also, no more than 50% of households in the consultation area outside the proposed CPZ must oppose it. (Note – in all three stages only responses to the Council's consultation will be included in this calculation).	
Stage 2	<ul> <li>To determine support for a preliminary design. This design would take into account the views expressed at Stage 1.</li> <li>The preliminary design will indicate the extent of the proposed CPZ, the operational hours, the location of yellow lines, parking bays and all proposed restricted parking measures.</li> </ul>	As stage 1	Over 50% of responses from within the proposed CPZ must support the idea of a CPZ, based on a response rate of at least 40%. Also, no more than 50% of households in the consultation area outside the proposed CPZ must oppose it.	
Stage 3	<ul> <li>To determine support for a final design. This design would take into account the views expressed at Stage 2.</li> <li>To meet the legal requirement to consider objections and representations to the making of the traffic management order.</li> </ul>	<ul> <li>Leaflets delivered to all premises in the Stage 1/2 consultation areas</li> <li>At least 21 days will be allowed for responses</li> <li>Responses can be made by post or on-line</li> <li>The consultation will be promoted on the Council's website and by posters displayed on-street throughout the consultation area.</li> <li>The traffic management order will be promoted by notices a) erected in every street where parking controls are to be introduced, b) published in a local newspaper and c) published in the London Gazette.</li> <li>The report recommending whether or not to implement the CPZ, including the consultation results, will be published on the council's website.</li> </ul>	For the scheme to be implemented over 50% of responses within the proposed CPZ area must support the proposed design (or a variation) based on a response rate of at least 40%. In addition, all objections and representations must be individually considered.	

Page 22



# Enfield Equality Impact Assessment (EqIA)

# Introduction

The purpose of an Equality Impact Assessment (EqIA) is to help Enfield Council make sure it does not discriminate against service users, residents and staff, and that we promote equality where possible. Completing the assessment is a way to make sure everyone involved in a decision or activity thinks carefully about the likely impact of their work and that we take appropriate action in response to this analysis.

The EqIA provides a way to systematically assess and record the likely equality impact of an activity, policy, strategy, budget change or any other decision.

The assessment helps us to focus on the impact on people who share one of the different nine protected characteristics as defined by the Equality Act 2010 as well as on people who are disadvantaged due to socio-economic factors. The assessment involves anticipating the consequences of the activity or decision on different groups of people and making sure that:

- unlawful discrimination is eliminated
- opportunities for advancing equal opportunities are maximised
- opportunities for fostering good relations are maximised.

The EqIA is carried out by completing this form. To complete it you will need to:

- use local or national research which relates to how the activity/ policy/ strategy/ budget change or decision being made may impact on different people in different ways based on their protected characteristic or socioeconomic status;
- where possible, analyse any equality data we have on the people in Enfield who will be affected eg equality data on service users and/or equality data on the Enfield population;
- refer to the engagement and/ or consultation you have carried out with stakeholders, including the community and/or voluntary and community sector groups you consulted and their views. Consider what this engagement showed us about the likely impact of the activity/ policy/ strategy/ budget change or decision on different groups.

The results of the EqIA should be used to inform the proposal/ recommended decision and changes should be made to the proposal/ recommended decision as a result of the assessment where required. Any ongoing/ future mitigating actions required should be set out in the action plan at the end of the assessment.



# Section 1 – Equality analysis details

Title of service activity / policy/ strategy/ budget change/ decision that you are assessing	Future approach to introduction of controlled parking zones.
Team/ Department	David Taylor
Executive Director	Simon Pollock
Cabinet Member	Cllr Rick Jewell
Author(s) name(s) and contact details	David B Taylor
	david.b.taylor@enfield.gov.uk
Committee name and date of decision	

Date the EqIA was reviewed by the	30.05.23
Corporate Strategy Service Name of Head of Service responsible	David B Taylor
for implementing the EqIA actions (if	
any)	
Name of Director who has approved	Doug Wilkinson
the EqIA	

The completed EqIA should be included as an appendix to relevant EMT/ Delegated Authority/ Cabinet/ Council reports regarding the service activity/ policy/ strategy/ budget change/ decision. Decision-makers should be confident that a robust EqIA has taken place, that any necessary mitigating action has been taken and that there are robust arrangements in place to ensure any necessary ongoing actions are delivered.

# Section 2 – Summary of proposal

Please give a brief summary of the proposed service change / policy/ strategy/ budget change/project plan/ key decision

### Please summarise briefly:

What is the proposed decision or change? What are the reasons for the decision or change? What outcomes are you hoping to achieve from this change?



Who will be impacted by the project or change - staff, service users, or the wider community?

#### Summary of Proposal

In view of the strong policy support for CPZs and the wider benefits that they can deliver, it is proposed to put in place a more strategic approach with new criteria to help guide and manage the prioritising of finite road and kerbside space and the delivery of future CPZs. Rather than solely responding to requests for CPZs from residents, it is instead proposed that a CPZ would be positively considered in any of the following circumstances:

- a) Where there is an outstanding commitment to take forward a CPZ, as listed in the report.
- b) Where a CPZ would help achieve a mode shift in favour of active travel and/or public transport, either on its own or as part of a wider package of measures
- c) Where a CPZ would facilitate the delivery of new housing or employment.
- d) Where a CPZ would help address an existing parking problem, where on-street parking stress exceeds 85%.

A provisional programme of CPZ schemes for delivery in 2024/25 is set out in the report.

As at present, each new CPZ would be subject to consultation with affected residents and businesses.

#### **Background Information**

Analysis by TfL<sup>1</sup> indicates that the following factors are most closely associated with higher than average car ownership:

- living in outer London;
- lower levels of public transport accessibility;
- higher income;
- children in the household;
- more than one adult in the household;
- in full time employment;
- Western European nationality.

At an individual level, car ownership varies by age and gender.

- Broadly, car ownership increases with age up to around 50-60 years old and then declines beyond that.
- On average, 46 per cent of men and 34 per cent of women have access to a car in London.
- Across all age bands, car ownership is lower amongst women, with this gap increasing

<sup>&</sup>lt;sup>1</sup> <u>https://content.tfl.gov.uk/technical-note-12-how-many-cars-are-there-in-london.pdf</u>



beyond age 40.

Car ownership also varies with ethnicity:

- Car ownership is highest amongst London residents of White ethnic origin, with car ownership around a third lower amongst Black and Mixed or Other ethnic groups.
- Asian families are more likely than other ethnic minority groups to own a car, although car ownership patterns vary substantially between different groups within the 'Asian' categorisation.

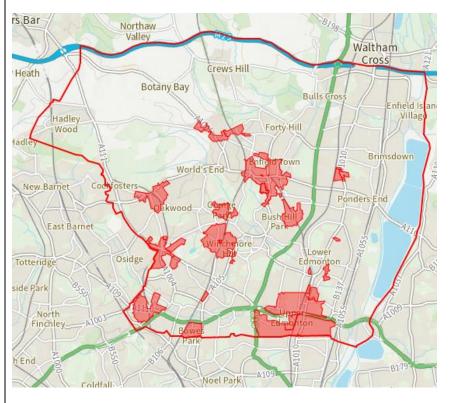
Multi-generational households

 Many minority ethnic groups in the UK have greater proportions of multigenerational households compared with the White ethnic group. Which may mean that they are more likely to have multiple cars at one property. <u>https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/fa</u> milies/adhocs/12005householdsbyagecompositionandethnicityuk2018

#### Local Data

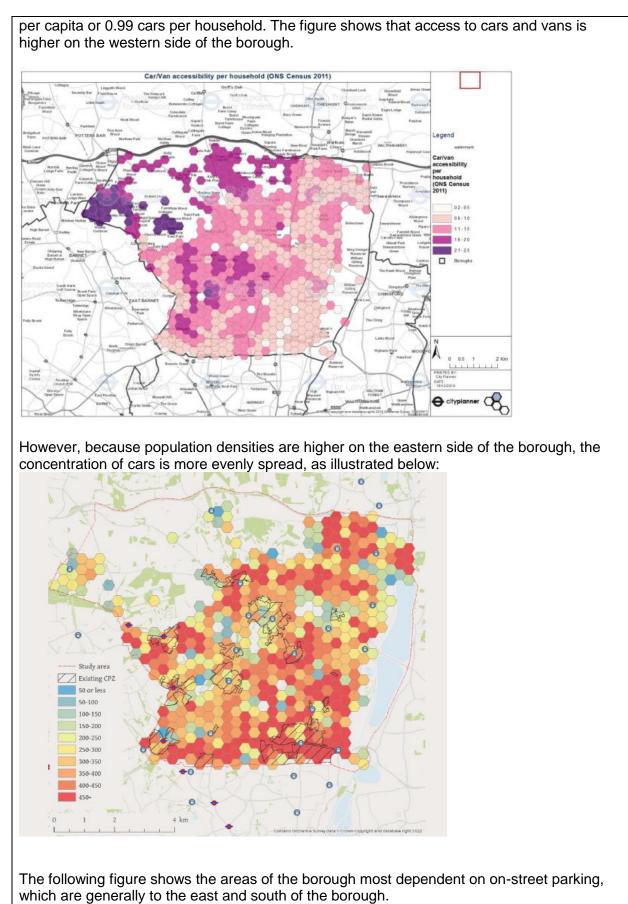
Data regarding the protected characteristics of permit holders in not currently held.

Currently, approximately 15% of the borough falls with a CPZ, as shown on the image below:

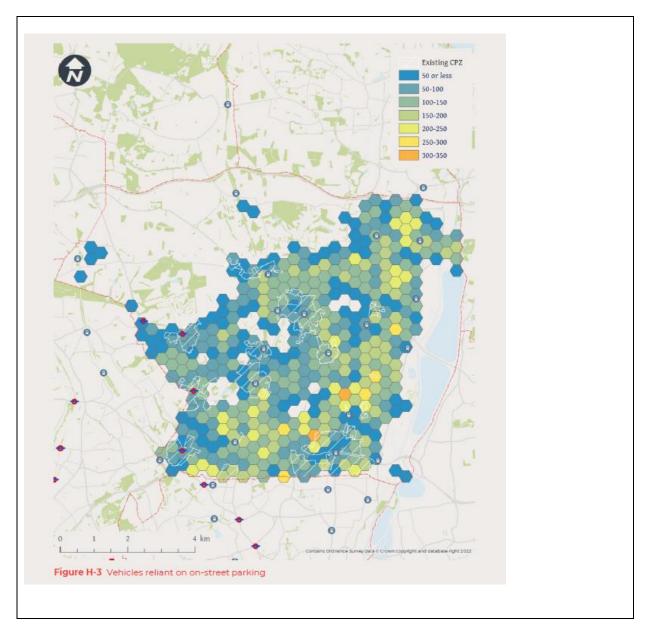


The spatial distribution of access to cars/vans across the borough, based on 2011 Census data, is shown below. At this time 19,653 cars were recorded, which equates to 0.38 cars

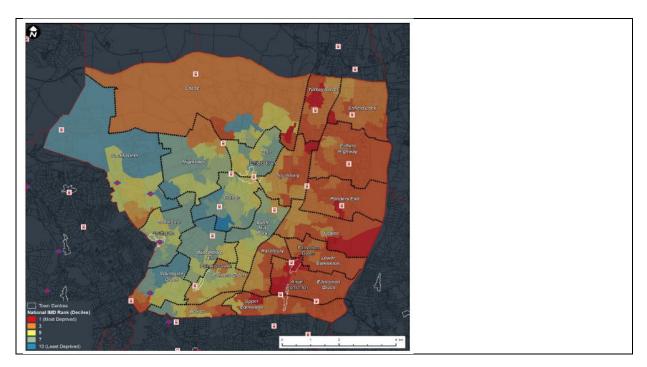












# Section 3 – Equality analysis

#### Age

This can refer to people of a specific age e.g. 18-year olds, or age range e.g. 0-18 year olds.

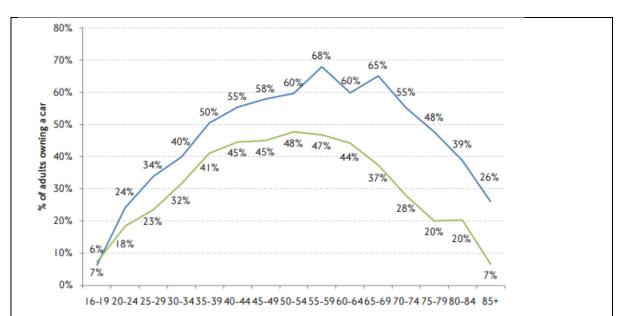
Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people of a specific age or age group (e.g. older or younger people)?

Please provide evidence to explain why this group may be particularly affected. Broadly, car ownership in London increases with age up to around 50-60 years old and then declines beyond that.<sup>2</sup> However, the proposals to extend the coverage of CPZs will affect all car users living in these zones equally, regardless of their age.

Figure 1: Car ownership in London by age and gender

<sup>&</sup>lt;sup>2</sup> <u>https://content.tfl.gov.uk/technical-note-12-how-many-cars-are-there-in-london.pdf</u>





Nationally, we know that there has been a large in increase in the number of older people in England holding a full driving licence. Between 1995/1997 and 2020 the proportion of people aged 70+ holding a licence increased from 39% to 77%. We are aware that some older people with a pensionable income may have a fixed income and could potentially be disproportionality impacted by new CPZs. However, it should be noted that permit prices are a relatively small proportion of the cost of running a car when considering other running costs (insurance, fuel, maintenance etc.) Furthermore, as an affordable alternative to car ownership for residents, older people of pensionable age are eligible for free travel across London and free local bus journeys nationally. The Council has also put in place 'brown badge' bays in certain car parks to assist older (70+) residents that don't qualify for a blue badge.

#### Mitigating actions to be taken

Effective consultation on individual schemes to ensure that the views of people of all ages are captured.

#### Disability

A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on the person's ability to carry out normal day-day activities.

This could include: physical impairment, hearing impairment, visual impairment, learning difficulties, long-standing illness or health condition, mental illness, substance abuse or other impairments.

Will the proposed change to service/policy/budget have a differential impact



[positive or negative] on people with disabilities?

Please provide evidence to explain why this group may be particularly affected. At the 2021 Census, 44,900 Enfield residents (13.6% of the total) reported having a disability, with 7.2% of people have their day-to-day activities limited a little; 6.4% have them limited a lot.

Data on disability among the working age population estimated that in the year ending December 2020, 52,700 (nearly 25%) Enfield residents aged 16-64 were estimated to have a disability, higher than London (17.9%) and England (22.4%).<sup>3</sup> In terms of our population of children and young people, Enfield currently maintains Education, Health and Care Plans for 3.5% of 0–25-year-olds in Enfield, and around 10.6% of school age children and young people receive Special Educational Needs (SEN) Support at school.

There are currently 11,588 blue badge holders in Enfield, some of whom will live in controlled parking zones. Disabled residents living in new CPZ zones with a Blue Badge will not be impacted, as they will be entitled to a free resident's permit. Disabled people who are blue badge holders living outside the CPZ will also be able to park for free in designated bays in the CPZ while displaying their blue badge.

To mitigate the impact of increased CPZ coverage on people who care for disabled people living in a CPZ, care permits will remain free of charge to enable a carer regular home visits to residents in a CPZ.<sup>4</sup>

#### Mitigating actions to be taken

Effective consultation on individual schemes to ensure that the views of people with disabilities are captured.

#### **Gender Reassignment**

This refers to people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on transgender people?

Please provide evidence to explain why this group may be particularly affected.

There is no evidence to suggest this will have an adverse impact on the ground of

<sup>&</sup>lt;sup>3</sup> Enfield Council, <u>Borough Profile</u>, 2021

<sup>&</sup>lt;sup>4</sup> <u>https://www.enfield.gov.uk/ data/assets/pdf file/0016/4363/carer-permits-terms-and-conditions-parking.pdf</u>



gender reassignment.

# Mitigating actions to be taken N/A

#### Marriage and Civil Partnership

Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, where-as a marriage can be conducted through either religious or civil ceremonies. In the U.K both marriages and civil partnerships can be same sex or mixed sex. Civil partners must be treated the same as married couples on a wide range of legal matters.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people in a marriage or civil partnership?

Please provide evidence to explain why this group may be particularly affected.

There is no evidence to suggest this will have an adverse impact on the ground of marriage and civil partnership.

Mitigating actions to be taken

N/A

#### Pregnancy and maternity

Pregnancy refers to the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on pregnancy and maternity?

Please provide evidence to explain why this group may be particularly affected.

There is no evidence to suggest this will have an adverse impact on the ground of pregnancy and maternity.

Mitigating actions to be taken N/A



#### Race

This refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people of a certain race?

Please provide evidence to explain why this group may be particularly affected.

The proposals to increase the CPZ coverage will affect all car users living in these zones, regardless of their race.

Based on the 2021 Census, residents from White British backgrounds make up 31.3% of Enfield's inhabitants with other White groups (including White Irish) combined at 28.7%. Mixed Ethnic Groups account for 5.9%, Asian Groups for 11.5% and Black groups for 18.5% of Enfield's population.<sup>5</sup>

Based on average travel modes from the London Travel Demand Survey (LTDS) data in Enfield all ethnic groups except for 'Other Ethnic Group' are more than likely to drive or be driven in a car or van than use any other mode. It is important to note that the sample size of LTDS data is small, therefore these percentages may not precisely reflect the travel behaviours of each ethnic group.

It is possible that the additional CPZ coverage may have a greater impact on households with multiple cars registered at one house, which may have a disproportionate impact on ethnic minority communities. This is because minority ethnic groups in the UK have greater proportions of multigenerational households compared with the White ethnic group. Which may mean that they are more likely to have multiple cars at one property.<sup>6</sup>

#### Mitigating actions to be taken

Ensure that engagement regarding specific schemes is accessible to people of representative ethic groups.

<sup>&</sup>lt;sup>5</sup>https://enfield365.sharepoint.com/sites/Intranetchiefexec/SiteAssets/Forms/AllItems.aspx?id=%2Fsites%2FIn tranetchiefexec%2FSiteAssets%2FSitePages%2FPopulation%2D%26%2DDemography%2F2021%2DCensus%2D %2D%2DEnfield%2DHeadline%2DReport%2Epdf&parent=%2Fsites%2FIntranetchiefexec%2FSiteAssets%2FSite Pages%2FPopulation%2D%26%2DDemography

<sup>&</sup>lt;sup>6</sup>https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/families/adhocs/12005 householdsbyagecompositionandethnicityuk2018



#### Religion and belief

Religion refers to a person's faith (e.g. Buddhism, Islam, Christianity, Judaism, Sikhism, Hinduism). Belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who follow a religion or belief, including lack of belief?

Please provide evidence to explain why this group may be particularly affected.

The proposal is not expected to have an adverse impact on grounds of religion or belief. However, places of worship may fall within CPZs where additional kerbside parking controls are proposed. Places of worship will therefore be consulted as part of the design of individual CPZ schemes to help understand any specific requirements.

Mitigating actions to be taken

Ensure that engagement regarding specific schemes includes places of worship.

#### Sex

Sex refers to whether you are a female or male.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on females or males?

Please provide evidence to explain why this group may be particularly affected.

According to the Census 2021, in Enfield 52.3% of residents identify as female and 47.7% as male. This is very similar to the percentage split for London as a whole (49 per cent male, 51 per cent female). On average, in London, 46% of men and 34% of women have access to a car.<sup>7</sup> The proposal to increase the spread of CPZs will affect all car users living in these zones, regardless of their sex.

#### Mitigating actions to be taken

Ensure that engagement regarding specific schemes achieves an appropriate gender balance.

<sup>&</sup>lt;sup>7</sup> <u>https://content.tfl.gov.uk/technical-note-12-how-many-cars-are-there-in-london.pdf</u>



#### **Sexual Orientation**

This refers to whether a person is sexually attracted to people of the same sex or a different sex to themselves. Please consider the impact on people who identify as heterosexual, bisexual, gay, lesbian, non-binary or asexual.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people with a particular sexual orientation?

Please provide evidence to explain why this group may be particularly affected.

There is no evidence to suggest this will have an adverse impact on the ground of sexual orientation.

Mitigating actions to be taken N/A

#### Socio-economic deprivation

This refers to people who are disadvantaged due to socio-economic factors e.g. unemployment, low income, low academic qualifications or living in a deprived area, social housing or unstable housing.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who are socio-economically disadvantaged?

Please provide evidence to explain why this group may be particularly affected.

Enfield's IMD ranking compared with the 316 other local authorities in England dropped from 2015 to 2019: Enfield is now the 74th most deprived local authority in England overall, so still within the most deprived 25% of all districts. Enfield's average deprivation score has not worsened. However, Enfield has become relatively more deprived when compared with other London boroughs. In 2015, Enfield was the 12th most deprived borough in London, whereas in 2019 it was the 9th most deprived.

The increase in CPZ coverage will affect all car users living in these zones and may have a disproportionate impact on those who are socio-economically disadvantaged. However, it should be noted that permit prices are a relatively small proportion of the cost of running a car when considering other running costs (insurance, fuel, maintenance etc.)

Nationally, we know that car ownership in England depends heavily on household income. According to the Department for Transport's 2019 National Travel Survey,



45% of households in the lowest real income level quintile do not own a car or van compared with 14% of households in the highest real income level quintile.<sup>8</sup>

Furthermore, according to research undertaken by Transport for London, the most commonly used form of transport for Londoners with lower household incomes (below £20,000) is walking. The bus is the next most used form of transport with 69% of people with lower household incomes taking the bus at least once a week compared to 59% of all Londoners. In addition, 42% of Londoners with a household income of less than £20,000 have household access to a car compared with 65% of Londoners overall, declining to 27% of Londoners in the lowest household income bracket (less than £5,000).<sup>9</sup>

A number of existing CPZs coincide with deprived areas, particularly those around Edmonton Green. In addition, it is noted that some of the proposed new CPZs also impact some areas of deprivation in the east of the borough where there is a greater reliance on on-street parking.

Most of the borough provides a good level of public transport accessibility, providing a cost-effective alternative to car ownership. In addition, the Council is investing in improving cycle facilities across the borough, providing a healthy and cheap means of active travel. This will help some residents to travel without the need to use a car.

#### Mitigating actions to be taken.

Effective consultation on individual schemes to ensure that the views of people of all socio-economic backgrounds are captured. In addition, the Council will continue to invest in active travel measure in the east of the borough to provide a costeffective alternative to car ownership. The Council will also continue to work with Transport for London to improve bus services across the borough, but in areas of low car ownership in particular.

<sup>&</sup>lt;sup>8</sup> Department for Transport, <u>National Travel Survey</u>, 2019

<sup>&</sup>lt;sup>9</sup> Transport for London, <u>Travel in London: Understanding our diverse communities</u>, 2019



# Section 4 – Monitoring and review

How do you intend to monitor and review the effects of this proposal?

Who will be responsible for assessing the effects of this proposal?

Obtain additional information about uptake of permits by people with different protected characteristics to enable better assessment of impacts in future.

Monitor characteristics of consultation responses to ensure representative views are being captured.

The impact of the proposal will be assessed by the Highways, Traffic and Parking Service, supported by their consultants.



# Section 5 – Action plan for mitigating actions

Any actions that are already completed should be captured in the equality analysis section above. Any actions that will be implemented once the decision has been made should be captured here.

Identified Issue	Action Required	Lead officer	Timescale/By When	Costs	Review Date/Comments
Data on characteristics of permit holders not currently held.	Review options for obtaining better information about characteristics of permit holders.	David Morris	September 2024	TBC	
Public engagement	Develop and implement inclusive approach to consultation	David Taylor	Spring 2024	Funded as part of project costs	