



London Borough of Enfield

Title:	Approve the Introduction of the Bowes East Controlled Parking Zone
Report to:	Doug Wilkinson – Director of Environment & Streetscene Cllr Rick Jewell - Cabinet Member for Environment
Date of Report briefing:	2 Oct 2023
Directors:	Doug Wilkinson – Director of Environment & Streetscene Simon Pollock – Interim Executive Director of Environment
Report Author:	Jonathan Goodson jonathan.goodson@enfield.gov.uk
Ward(s) affected:	Bowes ward
Classification:	Part I Public

Purpose of Report

1. The report considers the response to the preliminary consultation (August 2022) and statutory consultation (May 2023) on the proposed controlled parking zone in the Bowes East area and recommends that a scheme be implemented, as advertised, on a permanent basis.

Recommendations

- I. **To approve** – the making of a traffic management orders pursuant to the Road Traffic Regulation Act 1984 and the undertaking of all other necessary steps to implement the parking zone shown at Appendix A on a permanent basis, which introduces resident permit controls operating 11am to 1pm, Monday to Friday.
- II. **To approve** – the funding of the estimated £30,000 implementation costs from the Parking Development Fund.

Background and Options

2. Policy Context and Travel Habit Implications: The Council declared a climate emergency in 2019 and has the ambition, as set out in its subsequent climate action plan, of achieving net zero carbon emissions by 2030, including the reduction in use of private vehicles within the borough.
3. In line with the Mayor’s Transport Strategy and its own policy framework, the Council continues to promote active travel via its scheme work and messaging in order to help the community achieve better levels of physical activity whilst reducing the detrimental noise, nuisance and road safety factors associated with excessive car use. The following table sets out the relevant policy context.

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 for new developments.
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.

<p>Enfield Transport Plan (2019)</p>	<p>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, one of which is: <i>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.</i></p>
<p>Climate Action Plan (2020)</p>	<p>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, one of which is: <i>Limit the provision of car parking spaces on new developments in line with the New London Plan and better manage existing kerbside space.</i></p>
<p>Air Quality Action Plan (2022)</p>	<p>The following action – <i>managing growing demand for on-street parking</i> - is one of those set out to help with the air quality priorities identified below:</p> <ul style="list-style-type: none"> • <i>make active travel the natural choice, particularly for those trips less than 2km (1.2 miles).</i> • <i>make more school trips safe, sustainable and healthy.</i> • <i>reduce the impact of private vehicles on our streets (through a reduction in emissions).</i> • <i>make the public transport network more accessible and the natural choice for longer trips.</i> • <i>reduce emissions from both existing buildings and new development.</i>

4. A perceived deficit of domestic parking space is a recurring topic of complaint submitted to the Council. But so too are the issues of main road congestion and excessive levels of traffic using residential streets. Hence, even if it were viable, and within local and regional policy, to provide ample parking space for new homes - or retrofit it to existing streets – doing so would only serve to boost car ownership levels and thereby exacerbate the network's lack of spare capacity for vehicles in motion.

5. Demand for travel will only increase with the growing local population and additionally the use of private cars is the least space efficient form of travel. Furthermore, neither of these or the transition to electric vehicles solve the problem of the use of private cars in growing numbers, resulting in this overwhelming the finite capacity of the network to accommodate them.

6. The view of officers is that residential parking zones can contribute to the set of measures needed to (a) increase the uptake in active travel and (b) moderate demand for private car usage across the community, by bringing the following desirable effects:
 - (i) **Commuters:** Deter mass daily car-based commuting into the area by those accessing train and bus services by removal of 'free parking' in the surrounding residential streets, thus encouraging commuters to switch to active or sustainable forms of travel for this leg of their journeys.
 - (ii) **Residents:** Prompt some occupants of homes within the zone, by the introduction of the modest annual permit prices, to dispose of vehicles they can make do without, encouraging more use of alternative modes of travel by this cohort.
 - (iii) **Domestic visitors:** Persuade visitors to homes within the zone to, likewise, consider alternative modes of travel for these trips, thereby avoiding the modest cost to the zone resident of the necessary visitor parking permits.
 - (iv) **Local retail:** Encourage local store owners and their workers (as with other commuters) to switch to active or sustainable options when travelling to work by removing the option of all-day free parking on nearby streets. Also, to exert a similar influence on the travel habits of customers, whilst retaining some scope for parking outside of the controlled period to assist those customers whose journeys are least easily done without a car.
7. The Council recognises the need for continuing car use by blue badge holders and by those employed to provide care to residents within the neighbourhood. Low-cost permit provision for registered carers is common to all Enfield's parking zones, as are free permits for blue badge holders who keep vehicles registered within the zone.
8. The Council also recognises that not all trips can be made easily without a private car, and that some residents have barriers to selecting active travel options. This notwithstanding, the Council continues to develop its cycling network, and favour interventions that encourage walking. The borough's residents are well served by train services and a network of high frequency bus routes.
9. Recent data (gathered together under Annex A to the June 2021 Enfield Healthy Streets Framework) reveals that 48% of trips in Enfield are made by car, compared to the London average of 35%. More than half of all trips on Enfield's network are less than 5km (3 miles), and hence are considered easily achievable by bicycle, equating to a 20-minute ride. Yet fewer than 1% of trips are, at present, being cycled. Looking just at trips made by car in Enfield, more than one in ten are shorter than 1km; equating to just a 15 to 20 minute walk. Overall, then, there is vast potential for more active travel.
10. Given that the majority of trip-makers will not have significant barriers to other travel options, the obvious conclusion is that a large body of trips in the borough continues to be made by car outside of necessity and probably due to force of habit or simply an excessive preference for the

perceived comfort or convenience of car travel. These habits contribute to local congestion, problems around school entrances, low levels of physical activity, and all the other unwanted effects of traffic-dominance felt by local communities. They also take up road space better left clear for vehicles serving the wider public – such as emergency vehicles and buses - and for those drivers with a genuine need to travel by car.

11. Accordingly, it benefits the wider community in the short term, as well as helping avoid gridlock in the longer term, to bring forward interventions that interrupt residents' prevailing habits around excessive car use. Officers see parking zones as a key component in this approach.
12. Single Yellow Lines – Balancing Resident Benefits/Drawbacks: High demand for new parking zones stands in contrast to the number of requests from the community, which is zero or close thereto, for having them removed. This underlines the view that the schemes offer inherent advantage to residents and that most judge the permit costs to offer good value. The controls delete a daily influx of commuter vehicles circulating around the neighbourhood as well as occupying its kerbsides. They cue residents, via graduated permit tariffs, to no longer store their largest vehicles on the street, where some complain they look unsightly and hinder visibility. They deter certain households from taking up unreasonable amounts of space by the ownership of multiple numbers of vehicles. They keep more space clear for visitors and delivery vehicles. And they resolve, at a stroke, issues of little-used vehicles being left on-street in long term storage by those living in the wider neighbourhood.
13. Referring back to section 6, this large degree of advantage to residents poses the risk that the desirable effects applying to the travel habits of the wider community are diluted by the tendency for schemes to free-up parking space and thereby increase the scope for those within the zone to own, and make more regular use of, private cars. Maintaining the convention of adding single yellow lines across driveways within the limits of a parking scheme helps maintain a degree of balance in this regard.
14. The original purpose of adding the single yellow lines – a component explicitly stipulated within previous versions of Department for Transport guidance on parking zones - was to deter inconsiderate drivers from blocking unmarked driveways during the operational period of the zone, instead of taking the somewhat greater risk of parking within a bay with no permit. A single yellow line operating at the same period, thus, removes this temptation. A second benefit is around recognition: the distinctive combination of bays and single yellow lines at crossovers offers confirmation to unfamiliar drivers that they remain within a parking zone. Officers feel these benefits still apply, even though latest government guidance leaves the component as optional.
15. Placing the single yellow line does not stop households continuing to improvise secondary parking positions across their own dropped kerbs overnight, etc, when domestic parking demand is highest. Hence it is not so profound a drawback, in the view of officers, as to outweigh all the advantages a zone offers the households within. But it does present some

helpful limitation (as one objector believes is warranted) on the levels of vehicle ownership within the zone, notably households with dropped kerbs. It addresses, furthermore, two key complaints about balance.

16. Households beyond the zone boundary will often complain about nuisance parking being displaced onto surrounding streets. The Council acknowledges this phenomenon but mitigates the adverse effects by selecting zones with strong boundary features – such as Green Lanes, in this case – and by checking that the streets beyond the boundaries are either covered by alternative controls or better able to accommodate overspill parking than those within; usually by dint of most homes without, on Wolves Lane for example, having off-street parking spaces. However, the addition of the single yellow lines offers a degree of balance in the matter, assigning those within the boundary a small share of the collective drawbacks to a zone being introduced.
17. Households that elect not to modify the original layout of their property by installing frontage parking sometimes take the view, not unreasonably, that they have helped maintain communal kerbsides, local greenery and floodwater attenuation areas while their neighbours, for their own convenience, have done otherwise. And that their neighbour's dropped kerbs effectively afford the household a second kerbside space for their sole use. This grievance is exacerbated with the introduction of parking controls as now the household with the paved frontage can feel the benefit of less densely-parked streets but avoid permit costs that those car-owners without frontage parking have little option but to pay. From this perspective there is better balance to apply the single yellow lines than to omit them, serving as a reminder that parking across one's own dropped kerbs is a freedom, not an entitlement.
18. **Preliminary Consultation for Bowes East CPZ:** The Council first consulted on a parking zone covering the streets shown at Appendix A in November 2021, prompted by petitions submitted from Princes Avenue and Tottenham Road indicating high support for a permit parking scheme. Further interest from the residents and elected representatives followed, despite a pause in the project work to take stock of the low response rate of just 5% to the initial consultation effort.
19. A follow up consultation in August 2022 yielded much greater levels of participation, with a response rate of 22%. Overall good levels of support (59%) were found. Only modest levels of opposition arose, even in the streets where most homes have driveways. In such streets the proposals were always less likely to find favour. Opposition was most pronounced in Grenoble Gardens, for example, but even here only 12 of 105 households were moved to submit comments in opposition.

Street	Approx. Number of Homes	Number of Responses	Response Rate	In Support		Opposed		Not Sure	
				Number	Percentage	Number	Percentage	Number	Percentage
Fairbrook Close	9	1	11%	1	100%	0	0%	0	0%
Princes Avenue	149	53	36%	36	68%	16	30%	1	2%
Tottenham Road	120	36	30%	31	86%	5	14%	0	0%
Grenoble Gardens	105	16	15%	4	25%	12	75%	0	0%
Upsdell Avenue	128	17	13%	7	41%	10	59%	0	0%
Berkshire Gardens	134	17	13%	6	35%	10	59%	1	6%
COMBINED	645	140	22%	85	59%	53	40%	2	1%

20. The following minor amendments were made to the design:

(i) Supplementary proposals to introduce kerbside cycle hangers were deleted from the three positions that attracted adverse comment: on Princes Avenue, Upsdell Avenue and Berkshire Gardens. (The Grenoble Gardens cycle hanger had previously been relocated to an area of footway build out, and the Tottenham Road cycle hanger attracted no objections. Both are thus retained within the final proposals.)

(ii) Two disabled bays were added near the dental practice on Upsdell Avenue in response to the surgery management objecting to the reduction in parking options for their less able patients.

(iii) Various minor alterations were made to the position of bays to account for newly introduced crossovers and similar.

21. **Statutory Consultation for Bowes East CPZ:** In April 2023 the Council ran its statutory consultation exercise on the revised proposals, which included notices published in the London Gazette, in the local newspaper and posted in the street. An updated leaflet was distributed across the zone and an email was sent to individuals whose email addresses had been captured under previous engagement.

22. Believing that the previous consultation established the degree of overall support across the area, the Council conducted its statutory consultation with a primary focus on inviting individuals who opposed the scheme to provide their feedback. The relevant regulations require the Council to consider such representations before proceeding but set no requirement to document messages of support.

23. Nonetheless 15 submissions of support were submitted within the 62 total responses. The 43 objections from within the zone represent around 7% of households. The 47 objections in total were split across the area as shown:

Princes Avenue	Tottenham Road	Grenoble Gardens	Upsdell Avenue	Berkshire Gardens	Outside Zone
17	6	8	6	6	4

24. **Addressing Recurring Objections:** Typically for such schemes, the cohort of objectors submit overlapping points of opposition, with some responses featuring a multitude of those points. The table below captures and addresses the 11 recurring points of objection that were submitted.

Objection 1: The Proposals Are Not Wanted

Paying to park in the street, along with other drawbacks, is unwanted.

Parking zone schemes are prone to polarise opinion and will never be universally welcomed. They will always suit the circumstances of some households better than others depending on what shifts the occupants work, how many vehicles they own, what off-street parking options they enjoy, how many visitors they receive or simply what end of the street they live at. Even so, a clear conclusion drawn from the previous 20 parking zones Enfield Council has introduced is that schemes are well valued by residents once in place. This is demonstrated by how many requests for new parking zones are received by the Council each year and how few requests (possibly none at all) are ever submitted seeking their removal.

The Council sets out, above, the wider benefits to the community of such schemes, and the specific advantages that tend to apply to those living within the zone. While 43 correspondents inside the zone have written to say the scheme is not wanted, unsolicited petitions for permit parking controls from the 2019/20 period featured signatures from 78 homes in Tottenham Road and 65 from Princes Avenue, together outnumbering the eventual set of statutory stage objectors more than 3 to 1. The consultation exercise that followed found, similarly, more households in favour (85 altogether) than households against (53).

The Council must balance the wider benefits of a scheme against the disbenefits to individual households. A good case can be made to proceed, even in light of a very mixed set of responses, in order to capture those benefits as well as to give residents the opportunity to see how the reality of living in a permit parking area differs from their most strongly expressed fears.

Government affords local authorities the powers to introduce permit parking zones without setting minimum levels of local support, and their placement across public streets has long been entirely commonplace. A council that takes reasonable steps to avoid proposals that are highly unpopular or unsuitable, and that seeks to avoid or mitigate any particular localised drawbacks that are identified, operates within its rightful powers to advance such proposals to implementation.

Objection 2: Permit Costs

Permits are unaffordable, should be free or at least cheaper, should not vary by engine size, are unfair, are high compared to the relatively short duration (2 hours) of the controlled period, are too costly for this neighbourhood, will prompt anxiety and poor mental health.

Summary of Permit Prices in Enfield Parking Zones

For the sake of consistency and fairness, zonal permit prices are standardised across all 20 of Enfield's across-the-week resident parking zones. Prices are halved for short hour zones, relative to all day zones, hence the relatively short duration of the favoured controlled period is

accounted for in the pricing. (Topic discussed further at Objection 5.)

Resident permits - 1-to-4 hour zones		
Engine size	First permit	Second and third permit
1000cc or less, and electric vehicles	£38.50	£47.50
1001cc to 1600cc	£77.50	£97.50
1601cc to 1999cc	£115	£145
2000cc or more	£197.50	£249

The ascending price based on engine size reflects the tendency for vehicles with larger engines to occupy more space and to pollute more. The roughly 25% surcharge on second or third permits is to provide some limiting factor on excessive car ownership within the zone. The revised pricing regime was decided by a recent Council decision on the matter, effective January 2023, and was subject to the normal approval and scrutiny procedures. Across all zones permits can be acquired free of charge by resident blue badge holders. So-called 'essential permits' can be purchased for £25 upon application and their eligibility covers registered carers.

Justification for Charging for Permits

It is typical across London that residents are asked to pay for permits for such schemes to match the cost of scheme administration and additional enforcement activity. Government advice directs councils to ensure their parking control accounts are self-financing. Permit prices are therefore set, borough wide, with the aim of breaking even.

Local authorities must publish details of their parking revenue accounts annually and must keep an account of their income and expenditure in respect of parking places. Any surplus is ringfenced under section 55 of the Road Traffic Regulation Act with approved uses including meeting costs incurred for public passenger transport services, and for road maintenance or highway improvement works.

The prevailing convention in the UK is that any driver can park at the side of a public road, so long as this is not obstructive and there are no restrictions to say otherwise. Curtailing this convention to favour residents is a discretionary power and the Council must balance the benefits to residents against the potential disbenefits to the wider public. Zonal controls can be viewed as an intervention that offer the most direct benefit to local car-owners, and offer only indirect benefits to the roughly one third of households that do not own a car. It is appropriate to ask those who benefit most from the intervention to help pay for it, thus making any such scheme a viable proposition.

The Argument for Permit Charges Being Reasonable & Affordable

Section 12 sets out why residents in existing zonal parking areas should find the controls good value for money. The annual permit price for a small hatchback in Bowes East CPZ will be £77.50, which equates to

just £1.50 per week. This is dwarfed by many other weekly transport costs people typically incur like oyster fares or fuelling their cars.

Ongoing costs associated with keeping and running a car (setting aside the cost to purchase one) can easily reach £1000 per year, when considering vehicle tax, insurance, MOT and maintenance, sundry parking fees, and the cost of fuel. Permit prices were recently reviewed by the Council and new charges came into effect from January 2023, informed by a detailed equality impact assessment. The charges are set to ensure that the cost of administering, operating and enforcing CPZs is fully covered.

As set out in the equality impact assessment, households for whom annual permit charges might not be affordable are likely to be relatively small in number. However, it is acknowledged that permit cost could be an issue for some. This is mitigated to some extent by the fact that:

- If applicable, permits are free to blue badge holders;
- The controlled hours only operate between 11am-1pm Monday to Friday, enabling some to avoid the need to purchase a permit if they are not at home during these hours;
- On-street parking is still available outside the zone, a relatively short walk away.

It is also noted that there has been no call to remove permit controls from streets across the Bowes Park CPZ, since being introduced to the west of Green Lanes in 2019. Streets therein like Marlborough Road and Whittington Road bear comparison in character and housing stock to Princes Avenue and Tottenham Road; these are the two streets with highest housing density in the proposed Bowes East CPZ. A measure that appears to be affordable and well valued in one zone, should prove likewise in the other. Similarly, the comparable set of streets found to the south of the borough boundary in Haringey are subject to long-established permit parking schemes of their own.

For context, a rather less affordable option for vehicle owners seeking betterment to their parking options is to pay for a domestic crossover. Records show that 44 of these were added in the wider N13 postcode in the previous financial year. Five have been newly installed within the Bowes East area recently enough to have necessitated updates to the drawings since the original consultation: three in Upsdell Avenue, one each in Princes Avenue and Grenoble Gardens. The typical one-off cost of installing a crossover – which is £2,300 at latest prices - equates to 30 years' worth of annual permits at £77.50 for a small hatchback.

Objection 3: Scheme is Revenue Motivated, Not Needed/Justified

There are few parking issues, there is little commuter or shopper use of the streets, the closest train stations are too distant to attract commuters, it is a money-making idea for the Council, no evidence has been issued proving community support.

Deterring On-Street Commuter Parking

The need to compete for on-street parking space with a cohort of drivers who were strongly suspected to be daily commuters was the main factor that is understood to have prompted residents of Princes Avenue and Tottenham Road to first undertake petitioning. From these streets came the main body of support for a parking zone when the neighbourhood was later consulted. Comments submitted in writing and by telephone from these residents left little doubt that commuter parking activity was prevalent, with workers heading to the nearby bus depot being one group mentioned often.

It was, likewise, commuter activity that prompted the introduction of the Bowes Park CPZ in 2019, which can be thought of as the twin of the proposed Bowes East zone lying immediately to the west of Green Lanes. In Bowes Park, the commuter parking was identified as city-bound bus and station users, along with a certain amount of high street outlet workers or customers. It is a reasonable assumption that the parking habits of these same commuter groups apply similarly on the streets to the east of Green Lanes, especially now those streets to the west are under permit control. Southbound bus stops directly adjacent to the zone boundary on Green Lanes offer boarding, across 4 high-frequency services, equating to 20 buses every hour heading towards the city. One southbound bus every three minutes represents a significant draw to commuters when free all-day parking is to be found in close proximity. Kerbsides at the western limit of the proposed zone are within a 15-minute walk of Bowes Park Overground Station. This is not overly far when considering that the 2018 event day zone for the new stadium at Tottenham came with parking controls that covered streets within a 30-minute walk.

Supporters of the scheme in the streets south of Tottenham Road report nuisance parking activity by commuters, in addition to vehicles associated with main road premises, and residents from Haringey storing vehicles in Berkshire Gardens etc to avoid the permit charges that apply in their own streets.

Altogether, there is little doubt that the streets are attracting drivers from beyond the area seeking free on-street parking, and in sufficient numbers to merit an intervention to capture the first benefit listed at section 6 above. When large numbers of residents are raising petitions, submitting requests via their ward councillors, and responding positively to Council consultations to expedite the introduction of a permit system they will need to help pay for – and citing commuter parking as a key issue – there is little cause for the Council to expend public money on a further study to verify it.

Addressing the assertion that evidence of support has not been made public, submitted petitions and consultation responses are, in essence, lists of residents' personal details and signatures. The extent of redaction required to make them suitable for sharing with the public, without contravening data protection regulations and basic good practice around privacy, would render them all but meaningless to the

reader. Ward councillors are independent figures who can confirm the prevailing views of their constituents on the topic.

It is likely, however, that the degree of non-domestic parking activity will vary across the zone, so a spectrum of reports on its prevalence is to be expected. Being persuaded that commuter parking is occurring and having proposed a parking zone to address it, any council would seek to draw a suitable zone boundary that minimises displacement of unwanted parking activity to the streets immediately beyond and provides coherence to the driving public. This may well leave the furthest homes covered by the zone at significant remove from the focal points (the train station, for example) of the commuter activity. Nevertheless, drawing a zone boundary to leave a coherent area enclosed within should generally take precedence over drawing one to, say, an arbitrary point in the street that falls further than a 20-minute walk from the nearest train station.

Tendency of Objectors to Overlook Wider Benefits

Section 6 sets out beneficial effects on local travel habits that officers link to the introduction of zonal parking measures, but that residents are unlikely to have in mind when weighing up what direct benefit the scheme would bring them and their street.

With an estimated one third of households (borough-wide) not owning vehicles, and roughly half the homes in this particular zone having off-street parking, it is to be expected that several hundred households from the 645 inside the proposed boundary might not judge the proposal to offer a strong direct benefit to their parking arrangements. From which cohort, 43 following-through and submitting objections to make that point is not especially high nor unexpected.

The Council acknowledges that the two streets nearest the North Circular Road (Princes Avenue and Tottenham Road) are somewhat dissimilar to the three parallel streets further south in terms of the amount of off-street parking capacity. With the two northernmost streets having little capacity, they represent classic parking zone territory. The other three, with so many of their homes having frontage parking, rather less so. However, it remains the view of officers that it would be illogical and imprudent to cover only the first two streets with the parking controls under this exercise, thus leaving the others sandwiched between large blocks of housing covered by zonal controls to the north, west and south. Moreover, given the benefits parking zones can bring to local travel habits, as set out at sections 6 to 11, the Council should seek to introduce such controls with a proactive mindset going forward, not only where the highest levels of support are first identified.

To recap, a local authority has legitimate powers to charge for permits to enable parking within CPZs, as well as rules it must follow in re-allocating any identified surplus. Sections 6 to 11 set out the wider benefits to the community that the Council attributes to introducing parking zones. The schemes, as set out in section 12, offer a particular

set of advantages to residents within the zone. Accordingly, the Council acts reasonably and within its powers to advance such schemes and to use receipts from permit sales to help fund their introduction and ongoing administration and enforcement activity. Not least when the majority view within the area of interest is in support of the action.

Objection 4: Impediment to Visitors

The controls will deter friends and family from visiting loved ones living within the zone, those with care needs will be affected, mental wellbeing will be affected.

Provision exists for those employed as carers who make visits to the neighbourhood to apply for an annual 'essential permit', at a cost of £25. Permit applications by those offering regular care visits on a 'friends and family' basis will also be accepted; the standard annual permit charges, which are only modest, apply to these applicants. Drivers, whatever the reason for their visit, who display a valid blue badge will not attract enforcement activity for parking in any of Enfield's resident-permit holder bays.

For visiting activity, more generally, section 6 sets out the wider benefits around local travel habits in there being a certain degree of deterrent around visitors driving to the neighbourhood. People undertaking such trips by car fall within that group of drivers who; "take up road space better left clear for vehicles serving the wider public – such as emergency vehicles and buses - and for those drivers with a genuine need to travel by car."

However, visitor permits are available to all households within the zones. These cost £10.50 for a book of 10 and there is no restriction on the number of visitor permits that can be obtained. In addition, under the future arrangements, visitors are more likely to find vacant kerbsides easier when they arrive.

None of the controls prohibit a driver stopping briefly to pick up or set down a passenger – where they plan to go out together for lunch, say - so visitor permits should not be required for such activity. Visitors who did not want to make use of visitor permits still have the option of visiting by car at weekends, or outside of the 11am to 1pm controlled period on weekdays, or by visiting without their car by active travel options or taking advantage of the excellent public transport options serving the location. Altogether, there are many reasonable options for visitors to exhaust before deciding the visit is no longer worth making.

Anxieties around permit controls cutting off visitors to vulnerable or older residents was a prominent concern raised at the same stage when the Bowes Park CPZ was being taken forward. To officers' best knowledge, the topic never resurfaced in communications with the Council once the scheme was implemented. Certainly, no request has ever been submitted to remove the controls on these grounds or any other. It is likely that the experience in the Bowes East area will prove similar; what is offered as a point of objection at the consultation stage, likewise, will

not translate into an ongoing point of concern once a scheme has bedded in.

The one third of households in the borough who do not own a car will include people who are older, or who have mobility restrictions, or who have young children to transport, or who make visits to vulnerable people and so forth. For such people the experience of making journeys without the facility to travel by car and park for free immediately outside the destination will be routine. The complaint that the proposed parking controls place undue restriction on visitors should be considered in that context.

Objection 5: The Controlled Period is Too Short

Finding parking space is hardest in the evenings, non-domestic parking activity occurs across the day not just between 11am and 1pm, permit costs are excessive for only 2 hours of benefit.

The Council uses experienced officers and other practitioners to advise on the most suitable controlled periods of its proposed parking zones. Where the primary unwanted parking activity is all-day commuters, short middle-of-the-day controlled periods will generally suffice. When the city-bound worker, for example, no longer chooses to leave their vehicle in the street in the middle of the day for fear of receiving a parking fine then, naturally, it will no longer be amongst the vehicles occupying spaces in the early evening either. All day controls are typically favoured around major retail centres, where numerous visitors could otherwise travel by car to undertake business in the town centre avoiding the shorter controlled period. The Bowes East area fits best in the former category; hence the shorter hours are favoured.

It is, similarly, incorrect to think of the degree of utility a zone offers its residents to be directly proportional to the duration of the controls. A zone operating across the 8 hours from 9am to 5pm around a town centre would delete almost all non-domestic parking, for example, as drivers are not typically heading out to seek parking spaces in other people's streets in the period from 5pm to 9am the following morning. A zone across the same area that operated, not for just 8 hours, but 24 hours day and night would not be 3 times more effective merely for the 3-fold increase in duration.

The controlled period of 11am to 1pm, weekdays only was chosen to match up with the hours of the pre-existing Woodside West parking zone, which covers numerous streets immediately south of Berkshire Gardens and the borough boundary. This matches the approach taken with the introduction of the Bowes Park CPZ in 2019, west of Green Lanes, which was bordered by Haringey streets with 10am to 1pm controls.

Despite similar fears about the utility of shorter controls arising prior to the implementation of the Bowes Park CPZ, the experience was that residents reported a transformational change in the amount of vacant kerbside seen after the scheme went live. The same rationale that

proved valid for Bowes Park is likely to be proven valid again for Bowes East CPZ. Legitimate domestic parking activity is still likely to peak in the evenings, when residents are most likely to be home, and their cars parked in the street. However, the total available space for these vehicles will no longer be shared with residents of Haringey storing vehicles there to avoid permit charges in their own street; nor any commuters who now need to avoid the 11am to 1pm period; nor as many vehicles currently stored on street by residents but which they need little and will choose not to retain and buy permits for.

Accordingly, even though the middle-of-the-day controlled period will not prevent each and every non-resident from seeking parking space in the street towards the end of the day, it will afford permit holders the ability to dominate use of the space, and will strip away other vehicles in such numbers that the benefits will be clearly apparent.

Objection 6: Impact on High Street Businesses

Businesses will close or suffer if side-street parking is removed.

Section 6 above sets out the deliberate intention that the controls will present a deterrent to staff of local businesses, as with other daily commuters, on driving into the area and seeking free all-day parking in the adjacent side streets. It would be better if these journeys were made by other means.

While some benefits in deterring visits by customers in private cars is also identified, this is mitigated by the zone's shorter hours. Customers in cars retain the freedom to seek side road parking spaces all day at weekends and most of the day on weekdays providing visits end before 11am or commence after 1pm. The proposals also retain pre-existing paid parking places at the western end of the ladder roads, intended to serve a small number of customers driving to the shops. In terms of servicing, none of the new zonal controls prohibit short-duration loading activity. One effect of the scheme may, indeed, be to leave more kerbside vacant to accommodate such activity.

Small commercial and retail units in a local high street setting may be less reliant on large amounts of adjacent customer parking space than the public imagines. Zonal parking controls applied to the side streets on the west side of Green Lanes in 2019 do not appear to have damaged the viability of the stores that continue to trade from units on the west side of the main road. And nor are the similar sections of high street found on Green Lanes to the south, and bordered both sides by Haringey's long-established permit parking zones, seen to be bereft of retail outlets. This may explain why very little comment has been made on the proposals across various consultation phases from nearby traders, but instead appears mostly as a supplementary point of opposition submitted by objecting residents.

Objection 7: Nuisance Parking at Dropped Kerbs

The Council currently struggles to deter drivers blocking dropped kerbs, so why should a permit zone be any better observed?

Reports of drivers blocking crossovers are, sadly, fairly common across the network. Near local retail centres it is especially prevalent, although typically only for short duration visits. Enforcement officers cannot take action on sight for this type of offence, but only upon receipt of a complaint, which enables them to distinguish inconsiderate parking at crossovers from lawful domestic parking activity.

Once the zonal marking regime is in place, the yellow lines at crossovers will offer an additional deterrent factor on drivers blocking private access points and represent a restriction enforceable on sight if contravened. Moreover, a greater presence of patrolling enforcement staff is likely, and more easily justified, once the large set of parking controls is in place. Altogether, any residents finding this a recurring problem should welcome the introduction of the parking zone, rather than oppose it.

Objection 8: Single Yellow Lines Not Wanted / Capacity Concerns

The finite on-street parking capacity weighed against the number of potential permits sold, fails to give confidence that a space will be available when sought. The presence of single yellow lines will further reduce parking capacity.

Sections above set out officers' view that the small limitation on households parking second cars at crossovers is seen as one of the wider benefits of a parking zone as well as (section 15 to 17) helping to address issues of balance. The deterrent on unwanted crossover blocking at Objection 7 is a further advantage.

In terms of anxieties about overall parking capacity, Council messaging around parking zones is consistent in saying that all schemes have drawbacks and limitations and that – while introducing a scheme generally benefits residents with no off-street parking options – purchasing a permit never guarantees finding a convenient space near the home. Rather, the idea of permits being valid across the area underlines the principle that the kerbsides remain communal (within the cohort of permit holders, during the controlled period) and that car owners may need to seek second-choice positions when their closest ones are found occupied. Overall, they are given advantage over non-residents as a result of the scheme, and on most occasions, this will improve their parking options.

Objection 9: Penalising Households Without Frontage Parking

The parking zone penalises households with no frontage parking, who have fewer options to avoid buying permits but may not currently struggle to find spaces.

Section 17 discusses the perceived imbalance between households with and without frontage parking. It acknowledges that applying permit controls can exacerbate the sense of imbalance, and sets out why the conventional regime of applying single yellow lines across driveways offers a token of redress, as well as providing other benefits.

However, the argument that the parking zone exacerbates the disadvantage of those without frontage parking is, generally speaking, looking at the broader issues back-to-front. It is in streets where few homes have frontage parking that zonal controls offer most direct benefit to residents. This is by deterring various forms of non-domestic parking from occupying scarce kerbside space upon which they, of all residents, most rely, and also by deterring excessive car ownership within the zone. Hence, this is why petitioning first arose amongst residents of Princes Avenue and Tottenham Road, not amongst the other streets.

Terraced streets with no frontage parking are the obvious territory for zonal controls. But, unavoidably, most zones include a mix of housing types. The Council sees a particular benefit to those residents without frontage parking, as well as to the wider community, in placing the controls. But the status quo position of some homes having frontage parking, others not, is outside the remit of the scheme to address. To argue that a scheme should not go forward because those it benefits most continue to lack all the pre-existing advantages of those fortunate enough to have frontage parking is fundamentally illogical. Households to the west of the zone with no frontage parking are likely to face more competition for spaces at present than counterparts to the east – the latter may thus see less benefit to the scheme, and a greater sense of imposition. However, taken as a group, they will see a net benefit from the controls being placed.

Objection 10: Failure to Tackle Other Traffic Issues

The streets have problems with nuisance vehicle activity at school times, high levels of traffic and pollution, speeding, lawless use of mopeds, and poor maintenance of road surfaces.

All such problems fall outside the scope of the project to address and should be considered side issues to the central argument as to whether the parking zone should or should not be introduced. Future project work is likely to look at issues around the school as well as the speed and volume of traffic in the area. The sections above sets out the likely benefit in curtailing some traffic, and hence lowering pollution, by dissuading drivers from entering the area to seek free parking space. There is no coherent argument to say that any of these factors will be notably exacerbated merely by better regulation of parking activity at the existing kerbsides.

Objection 11: Parking Will Be Displaced East of Wolves Lane

Displaced vehicles will occupy on-street space on streets east of the zone including Wolves Lane and Tottenham Road (East).

Wolves Lane/Mellville Gardens has been selected as the eastern boundary of the zone reflecting that it is a busier road (thus a more obvious boundary feature) and that homes thereon adjacent to the proposed zone are generally well-served by off-street parking space, which buffers occupants from any displaced parking.

East of Wolves Lane, Norfolk Avenue, Medesenge Way and Princes Avenue (East) are similarly well-buffered by good levels of off-street parking. The section of Tottenham Road between Wolves Lane and Beale Close is the exception within the set, having few homes with off-street parking and generally being rather constrained in terms of road space due to the lack of width and need to accommodate the W4 bus service. This is somewhat mitigated by footway parking provision and by the overspill capacity offered by the streets of St Paul's Rise etc for domestic parking activity.

On balance, however, officers feel that retaining Wolves Lane as the boundary offers greatest coherence. Adding in a section of Tottenham Road (East) to the proposals would have made it harder for road users to understand the limits of the zone whilst also drawing within the scope of the proposals a set of households from whom little has been heard hitherto about seeking zonal parking controls. Officers feel, furthermore, that any drivers who do seek, henceforth, to store cars on streets to the east will likely look first for spaces on the other streets listed above, where more capacity is to be found and parking spots are less intrusively set directly in front of other householders' windows, and the risk of damage from passing buses does not apply. In conclusion, the adverse effects should manifest little on the section of street where they would be most intrusive.

25. **Individual Objection – Upsdell Avenue Dental Surgery:** Messages representing the dental surgery at 1b Upsdell Avenue were received in previous consultation exercises. An anxiety about loss of customer and staff parking prompted the query as to whether a business bay could be provided. An explicit objection was also placed reading: “The proposed scheme will severely impact access to NHS care. Many of our patients have mobility issues and public transport is not an option for them. They rely on nearby parking in order to access our services.”
26. Business bays are sometimes provided in parking zones for use by traders who have routine need to make trips to and from the premises across the business day in a vehicle, such as a locksmith, and who would otherwise need to store said vehicle at significant distance from the workplace, hindering their operational activities. With no other registered businesses within the zone boundary, provision of business permits and bays was not favoured. Nor are they intended to be used as customer parking places (business bay permits are linked to vehicles registered to the premises) not for use of staff merely to facilitate travel to work by car, as this represents a bypass of the intended overall deterrent on commuter parking.
27. These being the rules applied across Enfield parking zones, and with business bays and permits not favoured, the dental practice would not be eligible for an annual permit nor for visitor permits. These are only available to domestic premises inside the zone. They could still leave vehicles across their own dropped kerbs, but not during the operational period when the yellow line becomes effective.

28. Officers did not feel that the car-based commuting preferences of surgery staff – for the various reasons given above - was a good reason to abandon the scheme or attempt to contrive a layout that excluded the western end of Upsdell Avenue.
29. In terms of visitor parking, officers noted that the surgery features one off-street parking space that could be allocated to less able customers when appointments are issued. In light of the concerns around less able visitors, the design was amended to include two disabled bays immediately adjacent to the premises; one replacing what had previously been shown as a cycle hanger, but that would otherwise have been a standard resident bay, the other within a section of double yellow line near the junction with Green Lanes. (With movements here inbound only since circa 2010, but the junction markings dating from the period when two-way traffic was still accommodated, the designers judged this section of double yellow line to be non-essential.)
30. Seeing that the premises are modest in size and that the practice's website refers to 3 surgeries running therefrom, officers felt that parking provision accommodating, potentially, three blue badge holder vehicles at once (whether driven by the patient or the person bringing them) would fully mitigate the concern that vulnerable patients would be denied access to dental services and would, in fact, represent relatively good levels of parking provision for less able visitors.
31. Further mitigation around the ease with which vulnerable patients can visit the surgery, before and after a parking zone is in place, is offered by the following points:
- (i) The controlled period only applies at 11am to 1pm on weekdays, hence the surgery could steer patients who did not have blue badges but still felt they could only travel by car to visit outside those times when issuing appointments.
 - (ii) At all other times, any driver can park in the permit holder bays and the overall effect of the scheme should be that more positions are found vacant than they were in the years before. Under the present scenario - with unrestricted usage of kerbsides by commuters, Haringey residents, customers and staff of main road stores, and so forth – the number of nearby on-street spaces the surgery can reliably tell visitors, blue badge holders or otherwise, they will find vacant upon arrival is zero. And off-street spaces, only one.
 - (iii) When a third of households across the borough make do without cars - which must logically include people who are aged, or who have infirmities, or who need to travel with small children - it cannot be accepted that the absence of parking facilities presents a definitive obstacle to their ability to travel or access services.
 - (iv) A driver displaying a blue badge can park in any of Enfield's permit holder bays without fear of receiving a ticket even during the zone's operational period.
 - (v) In the case of patients being driven to the surgery who are not blue badge holders, none of the new controls prohibit setting down of

passengers, but they are quite likely to leave more gaps at the kerbside for such activity to take place with greater ease.

32. The surgery followed up with a statutory stage objection. Their anxieties about the effect of the scheme on wider business viability is addressed at Objection 6 above. The loss of freedom for their staff or invited visitors to park across their dropped kerb is mitigated by this limitation only applying for two hours each weekday, and is addressed more broadly at sections 15 to 17 above. Their dissatisfaction at a non-domestic enterprise being ineligible to apply for a resident permit is noted, but this limitation applies across all Enfield's parking zones and the reasons for business bay provision not being added in this specific case is fair and logical, as explained at sections 26 and 27 above.
33. The message rejects the addition of the two disabled bays stating: *"The proposed blue bays outside the practice will cause more disruption and will lead to a greater number of missed appointments [by visitors who lack the blue badge designation to be able to make use of them, officers infer]."* In the view of officers this is an unreasonable response to the design having been modified to directly address the primary point of concern the practice first submitted.
34. At the present time, from the perspective of a surgery visitor, one of the two spots is sterilised in terms of parking activity by the double yellow line, and the second could be found already occupied by a driver who had left a vehicle there for any number of different reasons. In future, a blue badge holder will likely find at least one of the disabled bays empty and be able to use it. If not they can use any resident permit holder bay, although these may be further afield. Any other visitor will need to factor in time to find a parking space and walk back from it to the surgery, exactly as they would need to do under the present arrangements. But with the likelihood that parking space will be more easily found, except in the 11am to 1pm period on weekdays, which they can easily plan to avoid when making their appointment if they are determined to travel there only by car. Hence, to conclude that the addition of the two disabled bays will lead to a great number of missed appointments is unreasonable.
35. The message restates the point about hindering access to NHS services, which is addressed at section 31 above and addressed, furthermore, by the very amendments to the design the surgery now writes to oppose. It states "We serve thousands of patients in the local and surrounding areas..." While this may be true, the practice does not need to accommodate parking activity for more than a handful of patients at any one time, even if every one of them travelled by car.
36. The message asserts that the arrangements "will be a hugely destructive measure and could lead to the collapse of our business". The view of officers is that, ultimately, the dental practice is a small business operating from a location where visitor parking has always been limited and largely impossible to guarantee. In common with the premises on the high street, it retains its viability due to the good set of alternative travel options visitors have available and due, in reality, to never having been reliant on

better parking provision to attract customers. Patients with genuine mobility limitations and independent travel difficulties will, by the provision of the disabled bays, find superior parking options in future. Other patients who come by car but avoid the 2-hour restricted period, should also find more space available near the surgery. By these factors, the hindrance to visitor parking by non blue-badge holders during the operational period (which is less than 30% of the working week) is easily and suitably offset.

37. Individual Objection – Upsdell Avenue Van Owner: The objection from a van owner of Upsdell Avenue explained that the vehicle, which is sometimes in use for overnight shift patterns, does not fit in their frontage parking space but is generally accommodated across their dropped kerbs. Under the proposals, the van would be liable to receive a ticket when so parked, potentially while the driver was asleep following night work. On occasions, therefore, it would have to be left elsewhere. While the nuisance factor is acknowledged, officers do not see sufficient case to abandon the whole scheme or create a precedent of leaving the kerbs unmarked.

38. The experience of needing to leave domestic vehicles which cannot be accommodated in the frontage of the home at distance therefrom is not unusual in the neighbourhood, or the wider urban network. One effect of the scheme will be to reduce the nuisance value of this for the numerous homes in the zone without crossovers, by the deterring of less essential parking activity. Officers feel the scenario in question must be accepted as one of the cases where the proposals offer drawbacks, as well as benefits. While the particular anxiety around leaving vans beyond sight of the home is noted, this too is commonplace. Vans kept at the kerbside are much in evidence on Enfield's network and can themselves be the subject of complaint from fellow residents or road users due to hindering visibility and so forth. One van kept on the street amongst so many others is not particularly vulnerable, therefore, and the potential wrongdoer will not necessarily know that the van seen is not in front of the property occupied by its owner.

Preferred Option and Reasons For Preferred Option

39. Sections 6 to 12 above set out why the Council prefers to proceed with introducing a parking zone as advertised in preference to abandoning the proposals in the face of objections, as further supported by the previous indications of overall support across the area. In short, to capture helpful benefits in moderating local car use habits whilst also offering better balance between the parking options of residents and other drivers.

40. Sections 12 to 17 set out why the commonplace, but now optional, approach of marking single yellow lines at crossovers is preferred to omitting them. This is, in short, for deterring blocking of driveways and offering better balance to overall parking arrangements.

41. The option of proceeding with the 11am to 1pm weekdays only operational period is preferred over the option of extending the operational period and needing to commence the statutory consultation exercise afresh. There

are strong reasons for anticipating that the favoured hours will achieve the desired effects, as set out under Objection 5, whilst helping minimise certain concerns submitted by the objecting parties relative to a longer controlled period.

Relevance to Council Plans and Strategies

42. The scheme 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.

43. Improved management of 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

44. The report considers the response to the preliminary consultation (August 2022) and statutory consultation (May 2023) on the proposed controlled parking zone in the Bowes East area and recommends that a scheme be implemented, as advertised, on a permanent basis. The funding of the estimated £30k implementation costs to come from the Parking Development Fund.

Legal Implications

45. Section 122 of the Road Traffic Regulation Act (RTRA) 1984 places a duty on the Council to secure, as far as reasonably practicable, 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'. The proposed changes to the waiting restrictions are in accordance with the discharge of this duty.

Section 6 of the RTRA enables traffic management orders to be made on a permanent basis.

Section 45 of the RTRA 1984 provides authority for the Council to designate parking places on the highways and section 46 enables charges to be introduced for vehicles left in a parking place.

Section 55 of the 1984 Act sets out financial provisions relating to designation orders, requiring an account to be kept of income and expenditure in respect of parking places. Any surplus in the Parking Places Revenue Account can only be spent on the items specified in s55(4) (a)-(f).

The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 prescribe the procedure to be followed in making a traffic management order. Any written objections or representations received during the period following the publication of a notice of proposals must be conscientiously taken into account before deciding whether the proposed order should be formally made.

The recommendations contained within the report are in accordance with the Council's powers and duties as the Highway Authority.

Equalities Implications

46. An equality impact assessment at Appendix B discusses the equality implications in depth, as applying to the ten identified groups. In brief, no differential impacts are identified applying to the following 6 groups: 'gender reassignment', 'marriage and civil partnership', 'pregnancy and maternity', 'religion and belief', 'sex', and 'sexual orientation'. While the lingual and ethnic diversity of the area is acknowledged, no differential impacts are identified under 'race', however the issue of multigenerational households is explored with respect to the need to purchase multiple permits per home.
47. Detailed consideration is given to a set of somewhat overlapping potential impacts applying to the following groups: 'age', 'disability', and 'socio-economic deprivation'. The standard provision in Enfield's parking zones for care visits and blue badge holder parking is concluded to mitigate concerns around vulnerable residents being left more isolated by the parking restrictions. Visiting is not made unduly difficult by the measures proposed. Similarly, access to the dental surgery on Upsdell Avenue is not deemed to be made unduly problematic for the less able, rather parking and dropping-off options should be marginally better under the scheme.
48. Around the affordability of permits, especially as it might apply to older people on fixed incomes, the assessment concludes that sufficient mitigation is in place due to the annual permit prices being modest relative to typical annual car-ownership costs, and due to the good alternative (free) travel options available to older people in this location.

Environmental and Climate Change Implications

49. Sections 6 to 11 above set out how the introduction of parking zones helps, on balance, to interrupt certain unhelpful travel habits and the community's present over-reliance on the use of private cars. This will tackle transport-based emissions and tackle the varied environmental impacts of car-dominance, even when the transition to electric vehicles is more firmly established. The Council's Climate Action and Sustainability

lead officer concurs with the above and adds that controlled parking zones also contribute to a fairer use of the public realm.

Public Health Implications

50. Interrupting the community's over-reliance on the use of private cars will encourage more use of active travel, which brings public health benefits in terms of lower emissions and greater levels of physical activity, as residents can fit periods of walking or cycling into their routine journeys. A shift from private cars to more use of public transport also offers health benefits with regard to creating a reduced scope for road user injuries to occur, due to poor driving or other types of driver error.

Other Implications – Procurement Implications

51. Any expenditure in relation to the implementation of these measures must be in line with the Council Contract Procedure Rules and the Procurement Regulations 2015. Any contracts let or accessed must be managed in accordance with the Contract Management Framework.

Report Author: Jonathan Goodson
Traffic Engineering Manager
jonathan.goodson@enfield.gov.uk
0208 132 0988

Appendices

Appendix A – Scheme Proposals Drawing

Appendix B – Equality Impact Assessment

Background Papers

None.