

London Borough of Enfield

Portfolio Report

Report of: Doug Wilkinson, Director of Environment and Operational Services

Subject: Consultation on Changes to Residential Controlled Parking Zone (CPZs) Tariffs

Cabinet Member: Cllr George Savva, Cabinet Member for Licensing & Regulatory Services

Also consulted: Cllr Ian Barnes, Deputy Leader

Executive Director: Sarah Cary, Place

Ward: All

Key Decision: KD 5139

Purpose of Report

1. This report seeks Cabinet Member approval to proceed with consultation in respect of proposed changes to permits and charges for residential CPZs. In line with national and regional policy these changes seek to encourage the transition to the least polluting vehicles and reduce vehicle ownership per household over time..

Proposal(s)

2. That consultation be undertaken in respect of proposed changes to residential changes to permits and charges for residential CPZs:
 - Charges are levied based on vehicle engine emissions with higher charges for higher carbon dioxide emission levels.
 - Graduated permit charges are introduced with higher rates for second and third permits at a property.
 - A maximum of three permits per household will be issued.
 - Alter the structure for visitor's vouchers so the initial allocation per household is based on the hours a CPZ operates and increase charges for additional vouchers.
 - Introduce a paperless permit system for residents parking permits so they no longer need to display a paper permit.

Reason for Proposal(s)

3. The changes proposed will have an impact on our customers so there is a need to consult with them and consider their views before making a decision on what proposals to implement, if any. A future report will set out any proposals for implementing changes.
4. In terms of the changes which will be consulted on, they are intended to address key objectives:
 - Provide consistent and clear charges for permits for residents CPZs.
 - Support the equitable distribution of kerbside space.
 - Ensure that revenue at least covers the cost of operating the residential CPZ permit scheme.
 - Increase the proportion of trips made by active and sustainable modes in line with the Mayor of London's Transport Strategy.
 - Encourage a switch to vehicles which produce less pollutants and greenhouse gases while in use, which will support the carbon reduction targets in the Council's Climate Action Plan.

Relevance to the Council's Corporate Plan

5. Good homes in well-connected neighbourhoods

The proposals which will be consulted on will support good growth by encouraging a switch to more sustainable vehicles and increasing the uptake of active travel modes.

6. Safe, healthy and confident communities

The proposals which will be consulted on will support the delivery of healthy streets by encouraging a switch to more sustainable vehicles and increasing the uptake of active travel modes.

7. An economy that works for everyone

The proposals which will be consulted on will support the delivery of town centres that are vibrant, safe and inclusive by encouraging a switch to more sustainable vehicles and increasing the uptake of active travel modes.

Background

8. This report sets out the background to the proposals, details of the proposals and the related considerations and implications.
9. As set out in Appendix 1 there are a number of CPZs in Enfield. A CPZ is usually introduced to manage specific parking issues and they are generally in areas where on-street parking capacity is limited and / or times when demand for spaces is high,

10. For each CPZ there are various permit types available, including business and residential. Paper permits are issued to identify vehicles which are eligible to park in each CPZ area.
11. This report focuses on residential CPZ permits (hereinafter referred to as 'permit' or 'permits' for the sake of simplicity) which constitute the vast majority of permits issued. These permits have different charges depending on the hours of operation of the parking controls:
- All day – More than 4 hours a day.
 - Part day – 4 or less hours per day.
12. When looking at the total number of CPZ permits issued the parking permit database has been used to provide a snapshot (the number of permits fluctuates on a daily basis as new permits are issued or old ones are cancelled):

<i>CPZ Type</i>	<i>Number of permits issued</i>
All day	2,184
Part day	1,599
Tottenham Hotspur Event Day	3,642
Total	7,425

13. The Tottenham Hotspur Event Day CPZ has been included separately because residents do not currently pay for permits, so there will not be a financial impact on them arising from the proposals. For this reason, the Tottenham Hotspur Event Day CPZ has not been included in the impact analysis within this report.
14. Permits charges are currently based on vehicle engine size with the current bands and prices being:

<i>Band</i>	<i>All Day</i>	<i>Part Day</i>
1000cc or less	£55.00	£27.50
1001cc to 1600cc	£110.00	£55.00
1601cc to 1999cc	£165.00	£82.50
2000cc to 2499cc	£220.00	£110.00
2500cc to 2999cc	£275.00	£137.50
3000cc and above	£330.00	£165.00

15. It should be noted that the issuing of a permit does not confer any right to park in a specific location, instead it allows vehicles to be parked in a wider area or zone. Also, it is not a guarantee that a vehicle can actually park in the area, although this is normally the case.
16. The current tariff structure allows up to three permits per person per household to be issued and there is no limit on the number of permits per area. With increases to the density of housing (including via sub-divisions of residential properties) there is growing demand for residential permits without any commensurate increase in available kerbside space. There are also increasing demands for kerbside space for others uses such as cycle parking

and sustainable urban drainage, so this limited resource needs to be used as effectively as possible to deliver benefits to all users.

17. The cost of permits should cover the administration, compliance and enforcement of any schemes thus making the overall scheme cost neutral. Should there be any surplus, this must be used for transport schemes in the Borough; subsidising concessionary travel costs is currently the main use. These are £11.5m for 2020/21.

18. Since the previous changes (in 2016) there have been significant developments in respect of the approach to private vehicle ownership in London as set out in regional planning and transport policies:

<p>London Plan (2016)</p> <p>Intend to Publish London Plan (2019)</p>	<p>The current London Plan already had policies around managing car parking demand and encouraging shifts to more sustainable modes. The Intend to Publish London Plan (2019), which is still subject to final confirmation, goes further, setting 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 (when compared to the current London Plan) maximum car parking standards for new developments.</p>
<p>Mayor of London's Transport Strategy (2018)</p>	<p>Given London's forecast population and employment growth, the Mayor's Transport Strategy made 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).</p>

19. In addition, 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 (this is predominantly from roads), taking action in this area must be part of the Council's response.

20. Taking into account the above, when reviewing the levels and structure of current residential parking tariffs the objectives have been to:

- Provide consistent and clear charges for permits for residents CPZs.
- Support the equitable distribution of kerbside space.
- Ensure that revenue at least covers the cost of operating the residential CPZ permit scheme.
- Increase the proportion of trips made by active and sustainable modes in line with the Mayor of London's Transport Strategy.
- Encourage a switch to vehicles which produce less pollutants and greenhouse gases while in use, which will support the carbon reduction targets in the Council's Climate Action Plan.

21. The proposals which are being considered should meet these objectives:

1.	<p>Residents permit charges will be based on vehicle emissions. The lowest tariff cost should remain as for the current permits, which will cover the cost of administering the system. As previously there will be an exemption for those holding a valid blue badge.</p> <p>It is proposed that the new tariffs will be:</p> <table border="1" data-bbox="351 533 1362 842"> <thead> <tr> <th rowspan="2"><i>Band</i></th> <th colspan="2"><i>CO2 emissions (g/km)</i></th> <th rowspan="2"><i>All Day</i></th> <th rowspan="2"><i>Part Day</i></th> </tr> <tr> <th><i>From</i></th> <th><i>To</i></th> </tr> </thead> <tbody> <tr> <td>A</td> <td>0</td> <td>0</td> <td>£55.00</td> <td>£27.50</td> </tr> <tr> <td>B</td> <td>1</td> <td>150</td> <td>£110.00</td> <td>£55.00</td> </tr> <tr> <td>C</td> <td>151</td> <td>175</td> <td>£165.00</td> <td>£82.50</td> </tr> <tr> <td>D</td> <td>176</td> <td>200</td> <td>£220.00</td> <td>£110.00</td> </tr> <tr> <td>E</td> <td>201</td> <td>225</td> <td>£275.00</td> <td>£137.50</td> </tr> <tr> <td>F</td> <td>226</td> <td>-</td> <td>£330.00</td> <td>£165.00</td> </tr> </tbody> </table> <p>It should be noted that for older vehicles (pre 2001) information on carbon dioxide emissions is not available, so they will continue to be charged based on engine capacity, although with a simpler tariff structure:</p> <table border="1" data-bbox="351 1099 1362 1252"> <thead> <tr> <th><i>Engine Size</i></th> <th><i>All Day</i></th> <th><i>Part Day</i></th> </tr> </thead> <tbody> <tr> <td>Up to 1549cc or less</td> <td>£55.00</td> <td>£27.50</td> </tr> <tr> <td>1550cc to 3000cc</td> <td>£165.00</td> <td>£82.50</td> </tr> <tr> <td>3001cc and above</td> <td>£330.00</td> <td>£165.00</td> </tr> </tbody> </table> <p>These vehicles make up less than three percent of all cars registered in the UK.</p> <p>Using data from two CPZs (Enfield Town and North Middlesex University Hospital), which together make up around 12% of all paid for permits issued, the forecast changes to permit costs would be:</p> <table border="1" data-bbox="351 1547 1251 1704"> <thead> <tr> <th><i>Change in Cost</i></th> <th><i>Number in Sample</i></th> <th><i>% of Sample</i></th> </tr> </thead> <tbody> <tr> <td>Decrease</td> <td>87</td> <td>19%</td> </tr> <tr> <td>None</td> <td>200</td> <td>44%</td> </tr> <tr> <td>Increase</td> <td>172</td> <td>37%</td> </tr> </tbody> </table> <p>More information on potential impacts is included in Appendix B.</p>	<i>Band</i>	<i>CO2 emissions (g/km)</i>		<i>All Day</i>	<i>Part Day</i>	<i>From</i>	<i>To</i>	A	0	0	£55.00	£27.50	B	1	150	£110.00	£55.00	C	151	175	£165.00	£82.50	D	176	200	£220.00	£110.00	E	201	225	£275.00	£137.50	F	226	-	£330.00	£165.00	<i>Engine Size</i>	<i>All Day</i>	<i>Part Day</i>	Up to 1549cc or less	£55.00	£27.50	1550cc to 3000cc	£165.00	£82.50	3001cc and above	£330.00	£165.00	<i>Change in Cost</i>	<i>Number in Sample</i>	<i>% of Sample</i>	Decrease	87	19%	None	200	44%	Increase	172	37%
<i>Band</i>	<i>CO2 emissions (g/km)</i>		<i>All Day</i>	<i>Part Day</i>																																																										
	<i>From</i>	<i>To</i>																																																												
A	0	0	£55.00	£27.50																																																										
B	1	150	£110.00	£55.00																																																										
C	151	175	£165.00	£82.50																																																										
D	176	200	£220.00	£110.00																																																										
E	201	225	£275.00	£137.50																																																										
F	226	-	£330.00	£165.00																																																										
<i>Engine Size</i>	<i>All Day</i>	<i>Part Day</i>																																																												
Up to 1549cc or less	£55.00	£27.50																																																												
1550cc to 3000cc	£165.00	£82.50																																																												
3001cc and above	£330.00	£165.00																																																												
<i>Change in Cost</i>	<i>Number in Sample</i>	<i>% of Sample</i>																																																												
Decrease	87	19%																																																												
None	200	44%																																																												
Increase	172	37%																																																												
2.	<p>The cost of permits for the second and third vehicles in each household will be progressively higher than for a single vehicle. The proposed additional costs have been set at 15% for second vehicles and 30% for third (and fourth) vehicles:</p> <table border="1" data-bbox="351 2000 1362 2033"> <thead> <tr> <th><i>Band</i></th> <th><i>1st Vehicle</i></th> <th><i>2nd Vehicle</i></th> <th><i>3rd and 4th</i></th> </tr> </thead> </table>	<i>Band</i>	<i>1st Vehicle</i>	<i>2nd Vehicle</i>	<i>3rd and 4th</i>																																																									
<i>Band</i>	<i>1st Vehicle</i>	<i>2nd Vehicle</i>	<i>3rd and 4th</i>																																																											

	<i>Charge</i>	<i>Charge</i>	<i>Vehicle Charge</i>
A	£55.00	£63.25	£71.50
B	£110.00	£126.50	£143.00
C	£165.00	£189.75	£214.50
D	£220.00	£253.00	£286.00
E	£275.00	£316.25	£357.50
F	£330.00	£379.50	£429.00

In terms of the possible impact of the proposed changes, analysis indicates that less than 13% of households have more than one permit.

By having a graduated charge of this type, there will be a clear incentive to move to lower emission vehicles. It should be noted that this is not just about buying new electric vehicles, residents purchasing newer second-hand vehicles would qualify for lower charges based on their CO2 emissions.

It should be noted that for older vehicles (pre 2001) information on carbon dioxide emissions is not available, so they will continue to be charged based on engine capacity, although with a simpler tariff structure.

3. Each separate household in a controlled parking zone will be issued a maximum of three residents parking permits. Households which currently have up to four permits issued per household will be able to apply for up to this number for three years.

The direct impact of this will be limited as relatively few households have 3 or more vehicles:

<i>Number of Permits</i>	<i>Estimated Households</i>	<i>Percentage of Households</i>
One permit	3,296	87%
Two permits	424	11%
Three permits	51	1%
Four permits	12	Less than 1%

Whilst the current impact is limited over time this change will help manage the demand for parking within CPZs, particularly where densification and alternative uses, such as Houses of Multiple Occupation, have the potential to increase the number of people living in an area.

4. Alter the structure for visitor's vouchers so the initial annual allocation of permits is proportionate to when the CPZ operates:

<i>Days per week CPZ operates</i>	<i>Annual days of operation</i>	<i>Annual allocation of vouchers per household</i>
<5	260	50

	6	312	60
	7	364	70
	<p>There will also be a higher charge for additional permits once the annual allocation has been used. This will affect relatively few residents (circa 70 out of around 7,700 permit holders) and should not impact on the delivery of social services, with Council staff having access to CPZ permits for all areas, which means they can park without needing to use visitor permits.</p> <p>The charge for additional all-day visitor vouchers (above those already available to households as part of their annual allocation) will be set so that it acts as a deterrent to misuse.</p> <p>In addition, visitors permits will cover the hours of operation of the related CPZ rather than requiring multiple permits.</p>		
5.	<p>Introduce a paperless permit system for residents parking permits so there is no need to display a physical permit. This is a similar approach as for Vehicle Excise Duty (car tax) and will reduce the cost of administering the system. People will still be able to apply online and by post.</p>		

22. Consideration has been given to the setting of a separate diesel surcharge. This has not been pursued because:

- New diesel vehicles have seen similar reductions in their emissions compared to petrol equivalents so it would be inconsistent to levy an additional charge on one and not the other:

<i>Euro 6 emission limits (petrol)</i>	<i>Euro 6 emission limits (diesel)</i>
CO – 1.0 g/km	CO – 0.50 g/km
NOx – 0.06 g/km	NOx – 0.08 g/km
PM – 0.005 g/km (direct injection)	PM – 0.005 g/km

- Central Government taxes on new diesel vehicles and diesel fuel already act as a disincentive to buy diesel vehicles with registration data showing a fall in new diesel vehicles. The number of diesel cars registered for the first time in Great Britain during 2019 declined by 18% compared to 2018, to the lowest annual number since 2001. There was a 26% increase in the number of alternative fuel cars over the same time period.
- Another charge would add additional complexity to the permit system and potentially increases costs disproportionately for some households, particularly given the other progressive charges being proposed.
- Diesel vehicles have the same cost of enforcement as their petrol counterparts.

23. It should be noted that the proposals, which it is proposed form part of the consultation, are part of the Council's wider efforts to encourage active and sustainable travel, as set out in the Climate Action Plan. This includes investment in schemes which make it safer and more convenient to walk and cycle (in line with the Mayor London's target to get 80% of trips being made

by active and sustainable modes), as well as the delivery of electric vehicle charging points in line with the target to have at least an additional 250 sockets in place by 2025.

24. Prior to implementing these changes there will be an 8-week consultation. The duration of the consultation is in line with previous parking changes consultations and is appropriate for the changes proposed. The consultation itself will involve:

- Putting the consultation on the Council's website including providing answers to frequently asked questions.
- Additional promotional activity such as Council e-newsletter, social media and notice in local press.
- Sending out a letter to all properties in areas covered by Controlled Parking Zones with the exception of the Tottenham Hotspur Event Day area where people do not currently pay for their permits as revenue from penalty charges during events covers the cost.

25. Once the consultation is completed there will be analysis of the results before approval is sought for the implementation of any changes. The indicative timescales and actions for the consultation and related reporting are:

<i>Activity</i>	<i>Date</i>
Project management and drafting consultation materials (questionnaire, letter to permit holders, FAQs and webpage content)	September – November 2020
Sign-off consultation materials	December 2020
Letters and emails sent to permit holders informing them of the consultation	December 2020
Consultation made available on the Council website ('Consultation' section)	December 2020
First wave of promotional activity (for example, sign-posted through Council e-newsletter, social media and notice in local press)	December 2020
Email reminder sent to permit holders	January 2021
Second wave of promotional activity	January 2021
End of consultation period	February 2021
Toplines and data tables available	February 2021
Text available for report	February 2021

26. The current timescales for the overall process are:

<i>Timescale</i>	<i>Task</i>	<i>Notes</i>
November 2020	Internal approval of decision to consult	Will take around 4 weeks including Cabinet Member

	report	briefings, internal consultation and 5 day public notice period
December 2020 to February 2021	Consultation period	8 week public consultation period in line with previous report changing approach to tariffs
February 2021	Consultation review and final report preparation	Review consultation responses and prepare final report
February 2021	Internal approval of decision to implement report	Will take around 4 weeks for internal consultation and public notice period
March 2021	Pre-implementation	Amending and advertising traffic orders (circa 4 weeks), mobilising parking contractor and notifying permit holders
1 st April 2021	Implementation	Parking provider begins charging new rates for parking permits

Main Considerations for the Council

27. Below are set out implications in respect of:

- Safeguarding – None identified.
- Public Health – Consultation in itself will have no impact. If implemented the proposals in the consultation will be beneficial.
- Equalities – Consultation will be delivered in accordance with the Council’s related guidance and best practice. Initial analysis has identified some potential equalities impacts if the proposals are implemented so these will be considered, alongside information from consultation responses, before any changes are implemented to make sure there is suitable mitigation of the impact is minimised.
- Environment and climate change – Consultation in itself has a minor negative impact due to resources required to deliver it. If implemented the proposals in the consultation will be beneficial.
- Financial – Neutral as they confirm that the cost of consultation can be covered by existing revenue. If implemented the proposals in the consultation will cover related costs.
- Legal – Neutral as they confirm the proposals are within the Council’s powers and duties.

Safeguarding Implications

28. None identified.

Public Health Implications

29. Transport is one of the fundamental determinants of health; it may be health-damaging or health promoting. The proposals as outlined here will make transport in Enfield much more health-promoting by reducing transport

emissions the use of private vehicles. This will reduce the health costs of motorised transport and support people to use active travel modes.

30. 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.
31. 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.
32. 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.
33. 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.
34. Overall the proposals which are being consulted on 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.

Equalities Impact of the Proposals

35. The core proposal is for a consultation on changes to CPZ charges and related changes to processes. The consultation is an opportunity to assess the equalities impacts and adjust any changes so that they mitigate and / or minimise any negative impacts ahead of implementation. It will be delivered in accordance with the Council's related guidance and best practice.

36. Despite this, the analysis of the proposed changes does include equalities impacts with three main areas being identified:

<i>Area</i>	<i>Potential Impact</i>	<i>Mitigation</i>
Age	Access to e-permit system.	Will be available via phone and post.
Disability	Ability to park within CPZs.	Blue Badge holders will still be able to park in CPZs without charge.
Economic	Additional costs for owners of more polluting vehicles and households with multiple vehicles.	Initial analysis indicates that, whilst in areas with higher levels of deprivation there is more dependence on parking on-street (so potentially higher demand for CPZ permits), private vehicle ownership per household is lower in these areas. Despite this there will be close monitoring of consultation responses to see if there is evidence of significant adverse impacts.

37. Any proposals that are developed following the consultation will be done so with potential equalities impacts including EQuality Impact Assessment (EQIA) scoping and, if required, a full EQIA.

Environmental and Climate Change Considerations

38. The proposed consultation will have a slight negative impact on carbon emissions because it will require the use of resources to prepare, publish and analyse the related information. Despite the use of online communications and recycled materials for physical communications, there will be some related carbon emissions and it will not be possible to directly offset this impact, so these will be accounted for as part of the Council's emissions.

39. 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.

40. By implementing the proposals that are being consulted on this will be achieved:

<i>Proposal</i>	<i>Carbon Emissions Impact</i>
Charges are levied based on vehicle engine emissions with higher charges for higher carbon dioxide emission	Will directly encourage private vehicle owners to move to low carbon and carbon neutral vehicles.

levels.	
Graduated permit charges are introduced with higher rates for second and third permits at a property.	Will directly encourage private vehicle owners to move to low carbon and carbon neutral vehicles. It could also reduce the number of private vehicles owned per household and related use, which makes it more conducive to use active and sustainable travel, which are low or zero carbon.
A maximum of three permits per household will be issued.	Will limit private vehicle ownership per household and related use, which makes it more conducive to use active and sustainable travel, which are low or zero carbon.
Alter the structure for visitor's vouchers so the initial allocation per household is based on the hours a CPZ operates and increase charges for additional vouchers.	This proposal will not have any specific impact.
Introduce a paperless permit system for residents parking permits so they no longer need to display a paper permit.	The level of resources (and related emissions) required to administer and enforce a paperless CPZ permit system is lower.

Risks that may arise if the proposed decision and related work is not taken

41. These risks have been identified:

Risk Category	Risks
Reputational and Regulatory	By not consulting on the proposals outlined, the Council will not meet statutory requirements, which will lead to potential challenge and reputational damage.
Reputational and Strategic	By not taking action in respect of overdependence on private vehicles and related emissions, the Council cannot deliver its Climate Action Plan target for the borough to be carbon neutral by 2040.

Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

42. These risks have been identified:

Risk Category	Comments/Mitigation
Reputational	Risk: The consultation does not reach the intended audience and / or it is not understood by consultees.

Risk Category	Comments/Mitigation
	<p>Mitigation: The consultation is being undertaken with support from the Council's in-house experts and will include direct and indirect communications, which will be kept simple and made available in different formats if requested.</p>
Regulatory	<p>Risk: The consultation does not meet statutory requirements.</p> <p>Mitigation: The proposed duration and approach in respect of the consultation will be designed to meet statutory requirements and will be informed by previous consultations on similar changes.</p>
Strategic	<p>Risk: The proposals being consulted upon are the subject of a significant number of changes due to consultee feedback.</p> <p>Mitigation: The proposals identified can be altered to address significant issues highlighted in the consultation process. Changes will be assessed to check whether they meet outcomes including those relating to climate action, equalities and finance.</p>
Financial	<p>Risk: The proposals do not generate sufficient revenue.</p> <p>Mitigation: There will be a further assessment of the financial impacts of any proposals once the consultation has informed their development.</p>

Financial Implications

43. The proposed consultation will, based on the most recent consultation on CPZ charges, cost circa £10,000 to deliver. This cost will be met from existing Parking Services budgets.
44. Whilst not within the scope of this report, an assessment of the revenue implications of the proposed changes has been undertaken and, based on the proposals as outlined, there will be a slight positive impact. Once there has been consultation on the proposals and this has informed the changes that might be taken forward, further work will be undertaken to assess the financial implications arising from implementation.

Legal Implications

45. The power to charge for on-street parking is set out in s45 of the Road Traffic Regulation Act 1984 (RTRA1984). However, the Council has a duty under s122 of the RTRA1984 to only exercise such powers, so far as practicable

having regard to matters (a) to (d) below to “secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway”. The relevant matters are:

- (a) the desirability of securing and maintaining reasonable access to premises;
- (b) the effect on the amenities of any locality affected and (without prejudice to the generality of this paragraph) the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run;
- (bb) the strategy prepared under section 80 of the Environment Act 1995 (national air quality strategy);
- (c) the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles; and
- (d) any other matters appearing to the strategic highways company or] the local authority to be relevant.

In short, permit charges must relate to the above duty and cannot be set for any other purpose.

The proposals which are to be consulted on are in line with this duty and are within the powers the Council can exercise as set out in legislation.

Workforce Implications

46. None identified.

Property Implications

47. None Identified.

Other Implications

48. None identified.

Options Considered

49. Other than those highlighted in the report, the only other option considered was do nothing. This was not the preferred approach because the current approach to CPZ parking tariffs does not encourage the use of more sustainable vehicles or limit vehicle ownership per household in areas with high demand for on-street parking. This means they do not support delivery against national, regional and local targets in respect of good growth and climate action.

Conclusions

50. The proposed consultation will provide residents with an opportunity to inform proposals relating to changes to CPZ charges, which are being put forward to

support the Council's priorities. The consultation and related proposals meet statutory requirements and also support the Council's vision to be bold, make a difference and show we care.

51. If taken forward the proposals in the report should help reduce the significant contribution that road transport makes to carbon emissions (in Enfield in 2018 it accounted for 430 KtCO₂e out of the total borough emissions of 1,097 KtCO₂e) which is a priority at all levels of government.

Report Author: Dominic Millen
Group Leader – Transport Planning and Policy
Dominic.millen@enfield.gov.uk
020 8132 0987

Date of report: 19/11/2020

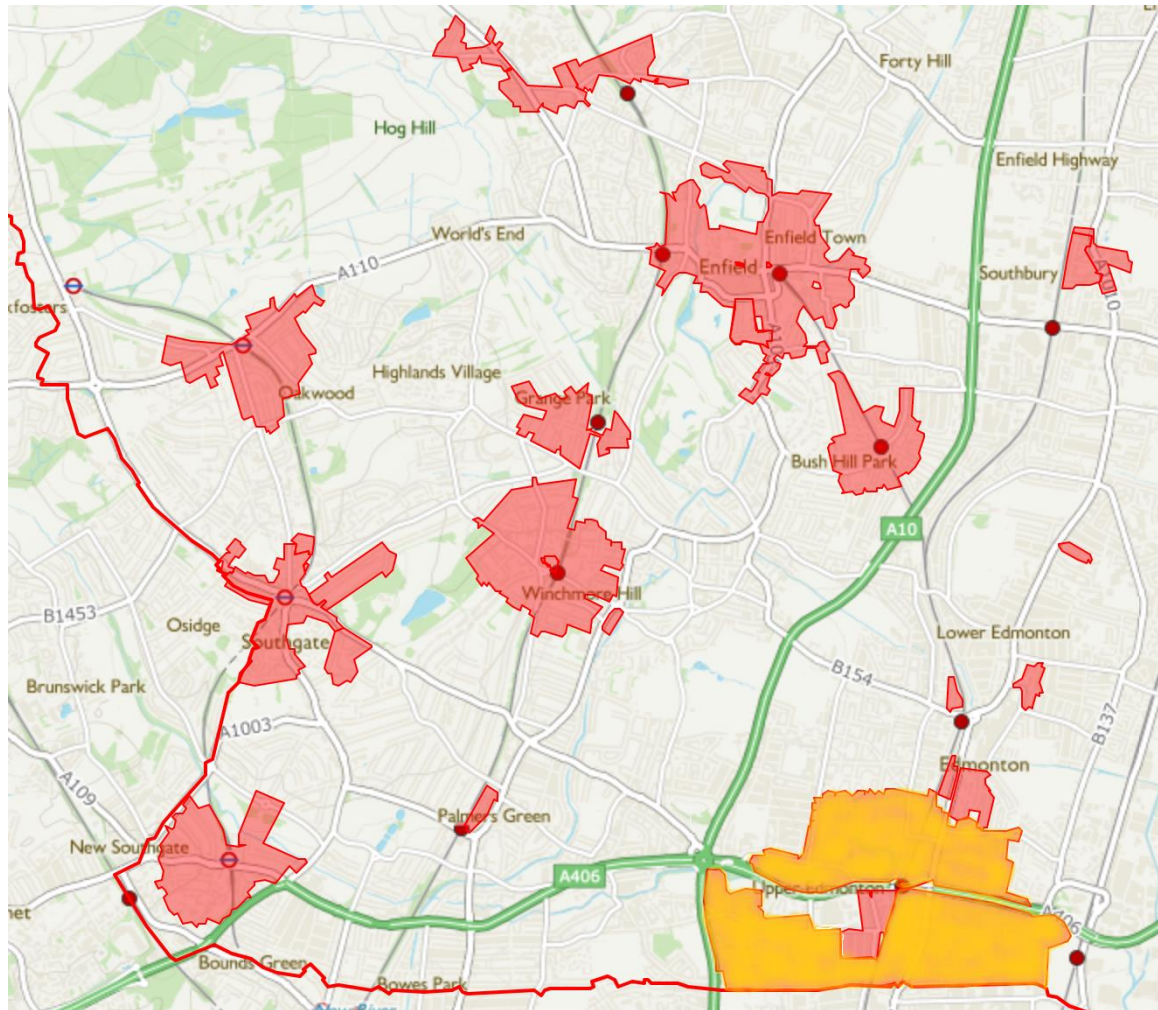
Appendices

- A. Controlled Parking Zones in Enfield**
- B. Proposals in Detail**
- C. Mapping of Index of Multiple Deprivation, On-Street Parking Demand and Car Ownership**

Background Papers

No additional documents have been relied on in the preparation of this report.

Appendix A – Controlled Parking Zones in Enfield



CPZs where residents pay for permits are highlighted in red.

The yellow area is the Tottenham Hotspur Event Day CPZ where residents do not currently pay for permits.

The specific hours of operation are:

<i>Zone</i>	<i>Hours</i>	<i>Days</i>
Arnos Grove	11 am - Noon	Mon – Fri
Bowes Park	10 am – 1 pm	Mon - Fri
Bush Hill Park	1 pm - 2 pm	Mon – Fri
Chase Farm Hospital	9 am - 6.30 pm	Mon – Fri
Edmonton Green East (E)	9 am - 6.30 pm	Mon – Sun
Edmonton Green West (W)	11 am - Noon	Mon – Fri
Edmonton Green South (S)	9 am - 8 pm	Mon – Sun
Enfield Town (Except roads below in sub zone A)	8 am - 6.30 pm	Mon – Sat
Enfield Town – Sub Zone A (Essex Road, Raleigh Road, Sydney Road & Tiptree Drive)	8 am - 6.30 pm	Mon – Sun

<i>Zone</i>	<i>Hours</i>	<i>Days</i>
Enfield College (All day)	9 am - 6.30 pm	Mon – Fri
Enfield College (Part time)	10 am - Noon & 2 pm – 4 pm	Mon – Fri
Gordon Hill	12 noon – 1 pm	Mon – Fri
Grange Park	10 am - 11 am	Mon – Fri
North Middx Hospital	9 am - 8.30 pm	Mon – Sun
Oakwood	2 pm - 3 pm	Mon – Fri
Palmers Green	8 am - 6.30 pm	Mon – Sat
Queens Avenue	9am - 6.30 pm	Mon – Sat
Southgate (All day)	9am - 6.30 pm	Mon - Sat
Southgate (One hour)	11am - Noon	Mon – Fri
South Edmonton Event Day	Noon – 9 pm	Event days only
Tramway Avenue	8 am – 10 pm	Mon - Sun
Winchmore Hill	10.30 am - 11.30 am	Mon – Fri
Winchmore Hill - Sub Zone (Wilson St)	9 am - 6.30 pm	Mon – Fri

Appendix B – Proposals in Detail

1. Charges are levied based on vehicle engine emissions with higher charges for higher carbon dioxide emission levels.

Currently CPZ permit charges relate to the engine capacity of a vehicle. The intention of this approach was that those who drive smaller vehicles, which arguably pollute less, would be able to purchase a cheaper permit than those who drive vehicles with larger engines. The charging schedule reflects this:

<i>Band</i>	<i>All Day</i>	<i>Part Day</i>
1000cc or less	£55.00	£27.50
1001cc to 1600cc	£110.00	£55.00
1601cc to 1999cc	£165.00	£82.50
2000cc to 2499cc	£220.00	£110.00
2500cc to 2999cc	£275.00	£137.50
3000cc and above	£330.00	£165.00

However, with the increase in efficiency of diesel and petrol engines as well as greater availability of low and zero emission vehicles, there is no longer as close a link between engine size and emissions. This means that the current approach is not effective in reducing the significant contribution that road transport makes to carbon emissions (in Enfield in 2018 it accounted for 430 KtCO₂e out of the total borough emissions of 1,097 KtCO₂e) which is a priority at all levels of government.

Therefore, it is proposed that permits charges are linked to a vehicle's CO₂ emissions, which is consistent with national, regional and local strategies and plans:

- London Plan (2016)
- The Road to Zero (2018)
- Mayor's Transport Strategy (2018)
- Enfield Transport Plan (2019)
- Enfield Climate Action Plan (2020).

It also aligns with the introduction of the Ultra Low Emission zone eXtension (ULEX) in 2021. This will see the existing Ultra

Low Emission Zone in central London extended to the North Circular Road. Three wards in Enfield will be included which means drivers of non-compliant vehicles will have to pay a charge to use them in the zone.

The proposed charges are:

<i>Band</i>	<i>CO2 emissions (g/km)</i>		<i>Charge</i>
	<i>From</i>	<i>To</i>	
A	0	0	£55
B	1	150	£110
C	151	175	£165
D	176	200	£220
E	201	225	£275
F	226	-	£330

This approach is based on the current Vehicle Excise Duty standards, albeit with fewer bands to make it simpler to understand and administer. The amount charged for permits in each band has not changed and the number of bands is the same as for the current system.

The emission levels have been set so that the number of vehicles in each band is forecast to be broadly similar (plus or minus up to 10%) to the current approach. This should smooth the transition and make sure that revenue does not change significantly.

For older vehicles (pre 2001) information on carbon dioxide emissions is not available, so they will be charged based on engine capacity, although with a simpler tariff structure:

<i>Engine Size</i>	<i>All Day</i>	<i>Part Day</i>
Up to 1549cc or less	£55.00	£27.50
1550cc to 3000cc	£165.00	£82.50
3001cc and above	£330.00	£165.00

These vehicles make up less than three percent of all cars registered in the UK so are unlikely to make up a significant number of those registered for permits.

As there is currently, there will be an exemption for blue badge holders.

There will not be exemptions for zero or low emission vehicles. This is because their use still has negative environmental impacts, including from the resources required to manufacture them and the PM2.5 particles arising from their use. There is also an administration cost associated with issuing permits for these vehicle types. However, they will be charged the lowest permit rate to reflect their positive impact on carbon and other types of emissions.

Using data from two CPZs (Enfield Town and North Middlesex University Hospital), which together make up around 12% of all paid for permits issued, the changes to permit costs would be:

<i>Change in Cost</i>	<i>Number in Sample</i>	<i>% of Sample</i>
Decrease	87	19%
None	200	44%
Increase	172	37%

Where there is an increase, for 81% of permit holders it will be by one band (£55.00), for 16% it will be by two bands (£110.00) and for around 3% it will be by three bands (£165.00). Where there is a decrease, for 75% of permit holders it will be by one band (£55.00), for 19% it will be by two bands (£110.00) and for around 8% it will be by more than three bands (over £165.00 reduction).

Consideration has been given to the possible impact that the changes will have on low income households and, whilst it is difficult to assess without having access to detailed vehicle ownership data, given the dispersed locations of the existing controlled parking areas in Enfield, there is no reason to conclude that any specific social group will be impacted disproportionately. It should also be noted that vehicle ownership is lowest in those areas which have high levels of deprivation, so any increase in charges should not have a disproportionate impact on those living in more deprived areas. More information on this is included at Appendix C.

It should also be borne in mind that people could switch from older vehicles, to newer second-hand vehicles which have lower emissions. This would reduce their permit charges without needing significant investment in a new all electric vehicle.

2. Graduated permit charges are introduced with higher rates for second and third permits at a property.

In order to increase the rate of change to low and zero emission vehicles, it is proposed that the cost of permits for second and third vehicles in each household will be progressively higher than for a single vehicle. The tables below are based on the second permit being 15% more than the first, while the third permit is 30% more than the first:

All Day CPZs

<i>Band</i>	<i>1st Vehicle Charge</i>	<i>2nd Vehicle Charge</i>	<i>3rd and 4th Vehicle Charge</i>
A	£55.00	£63.25	£71.50
B	£110.00	£126.50	£143.00
C	£165.00	£189.75	£214.50
D	£220.00	£253.00	£286.00
E	£275.00	£316.25	£357.50
F	£330.00	£379.50	£429.00

Part Day CPZs

<i>Band</i>	<i>1st Vehicle Charge</i>	<i>2nd Vehicle Charge</i>	<i>3rd and 4th Vehicle Charge</i>
A	£27.50	£31.63	£35.75
B	£55.00	63.25	£71.50
C	£82.50	£94.88	£107.25
D	£110.00	£126.50	£143.00
E	£137.50	£158.13	£178.75
F	£165.00	£189.75	£214.50

For households with four vehicles it is proposed that that the fourth vehicle charge is calculated using the third vehicle band.

The level of charge will be based on the order in which permits are issued starting from 1st April each year.

It should be noted that for older vehicles (pre 2001) information on carbon dioxide emissions is not available, so they will continue to be charged based on engine capacity, although with a simpler tariff structure:

All Day CPZs

<i>Band</i>	<i>1st Vehicle Charge</i>	<i>2nd Vehicle Charge</i>	<i>3rd and 4th Vehicle Charge</i>
Up to 1549cc or less	£55.00	£63.25	£71.50
1550cc to 3000cc	£165.00	£189.75	£214.50
3001cc and above	£330.00	£379.50	£429.00

Part Day CPZs

<i>Band</i>	<i>1st Vehicle Charge</i>	<i>2nd Vehicle Charge</i>	<i>3rd and 4th Vehicle Charge</i>
Up to 1549cc or less	£27.50	£31.63	£35.75
1550cc to 3000cc	£82.50	£94.88	£107.25
3001cc and above	£165.00	£189.75	£214.50

These vehicles make up less than three percent of all cars registered in the UK.

By using the cost of permits to discourage car ownership beyond one per household, the Council will be taking action to reduce the use of private vehicles and all of the negative environmental and health impacts they have. However, the tariff structure also supports the use of the least polluting vehicles.

The breakdown of a sample (459) of the total number of paid for permits in Enfield (3,783) suggests that the vast majority of households only have one vehicle, with very few having three or more vehicles:

<i>Number of Permits</i>	<i>Estimated Households</i>	<i>Percentage of Households</i>
One permit	3,296	87%
Two permits	424	11%
Three permits	51	1%
Four permits	12	Less than 1%

This means that there will be no impact for the vast majority of households. For those households with more than one vehicle, the maximum impact will be an increase of £49.50 for those with two cars and £148.50 for those with 3 cars. Given the small number of households with 4 cars, it is proposed that the 4th vehicle charge is the same as for the 3rd vehicle so the maximum impact would be £247.50.

Appendix C includes mapping in relation to various indicators which highlight general trends:

Index of Multiple Deprivation – Least deprived areas in west of borough with most deprived in east.

On-Street Parking Demand – Lower demand in west of borough and higher in the east.

Car Ownership per Household – Higher in west of borough and lower in east.

This would indicate that in the east of the borough the most deprived areas (which it is assumed include a higher proportion of low income households) have a greater reliance on on-street parking but lower levels of car ownership per household. Taken alongside the fact that the majority of paid for CPZs are in the west of the borough, this would indicate that there will not be a disproportionate impact on low income households.

For other groups, given the dispersed locations of the existing controlled parking areas in Enfield, there is no reason to conclude that any specific group will be impacted disproportionately.

3. A maximum of three permits per household will be issued.

Currently each person in a household can be issued with up to three permits. This means that technically two people in a one bedroom flat could park six vehicles in a CPZ.

Whilst this is not generally the case (there are relatively few households with four or more permits issued), it does allow for car ownership disproportionate to the size of property and in excess of London Plan maximum limits for new dwellings:

Maximum residential parking standards - From Table 6.2 Car parking standards			
<i>Bedrooms</i>	4 or more	3	1 to 2
<i>Parking spaces</i>	Up to 2 per unit	Up to 1.5 per unit	Less than 1 per unit

This Policy recognises that as London grows the ongoing provision of scarce space for the storage of private vehicles is unsustainable. This is particularly the case where there is intensification of existing buildings so that there is increased demand for car parking without a similar increase in available kerbside space.

The direct impact of this proposal will be limited as analysis of a sample of existing permits indicates that relatively few households have 3 or more vehicles:

<i>Number of Permits</i>	<i>Percentage of Households</i>
One permit	87%
Two permits	11%
Three permits	1%
Four permits	Less than 1%

This approach will also simplify the permitting system because details will be based on household addresses, rather than a resident's name and household address.

4. Alter the structure for visitor's vouchers so the initial allocation per household is based on the hours a CPZ operates and increase charges for additional vouchers.

To allow visitors to park in controlled parking zones when they are in operation there is a voucher system. Each resident in a controlled parking zone can purchase up to 5 books of 10 vouchers so they have a maximum of 50 in total. However,

requests for additional vouchers are considered on a case by case basis. The limit is in place to try and balance the genuine needs of residents against the risk of permits being passed on to non-residents, undermining the effectiveness of the controls.

Currently only around 70 residents, out of the total 7,700 (this figure includes the Tottenham Hotspur controlled parking area which currently has free resident's permits) with permits, request additional visitor vouchers.

At present, there are two types of vouchers:

- For part-day CPZs (operating for between 1 and 4 hours): £7.50 for a book of 10 one-hour vouchers.
- For all-day CPZs (operating more than 4 hours): £15 for a book of 10, with each voucher valid for half a day.

The current structure means that someone living in a part-day CPZ (<4 hours) needs a single voucher for a visitor to park for an hour, which costs £0.75; someone living in an all-day CPZ would have to use a half day voucher costing £1.50. Alternatively, someone living in a four hour CPZ would have to pay £3.00 for someone to park for 4 hours, while someone in an all day CPZ would pay £1.50.

Therefore, it is proposed that vouchers cover the hours of operation of the related CPZ (so all the hours of operation for all day CPZs and up to 4 hours for part time CPZs).

In addition, the current system does not take into account the fact that CPZs operate on different days, with some weekdays only and others covering weekends as well.

It is therefore proposed to change the allocation of visitor permits as follows:

<i>Days per week CPZ operates</i>	<i>Annual days of operation</i>	<i>Number of vouchers</i>
<5	260	50
6	312	60
7	364	70

The current 50 voucher limit meets the needs of the vast majority of residents. However, it is recognised that there may be

occasions when additional visitor permits are desirable. In order to discourage excessive visits by private vehicles and the onward selling of visitor vouchers, for example to allow commuter parking, it is proposed that the prices for any additional all-day vouchers are set at higher rates:

- For part-day CPZs (operating for between 1 and 4 hours): £30.00 for a book of 10 vouchers covering hours of operation.
- For all-day CPZs (operating more than 4 hours): £60.00 for a book of 10 covering hours of operation.

On an hourly basis, these rates are mainly equivalent to or lower than those currently charged for using pay and display bays:

<i>Time</i>	<i>Enfield Town</i>	<i>Other Areas</i>
1 hour	£2.00	£1.50
2 hours	£4.00	£3.00

It should be noted that as part of the parking permit system there are permits available for carers and blue badge holders are not required to have a permit to park in controlled parking zone bays. Therefore, the provision of social services or access for those with disabilities will not be adversely impacted.

5. Introduce a paperless permit system for residents parking permits so they no longer need to display a paper permit.

Currently permit holders need to display a paper permit in their vehicles in clear sight so that enforcement officers can see it.

The proposal is more a paperless system to be introduced whereby there is no longer a need to display a paper permit and the unique vehicle registration number is used to check whether a valid permit is being used.

The introduction of a paperless permit system will have several advantages:

- Makes the issuing of permits and related enforcement more efficient.
- Encourages more people to access Council services online.
- Avoids the inconvenience of having to replace damaged and lost permits.
- More environmentally friendly.

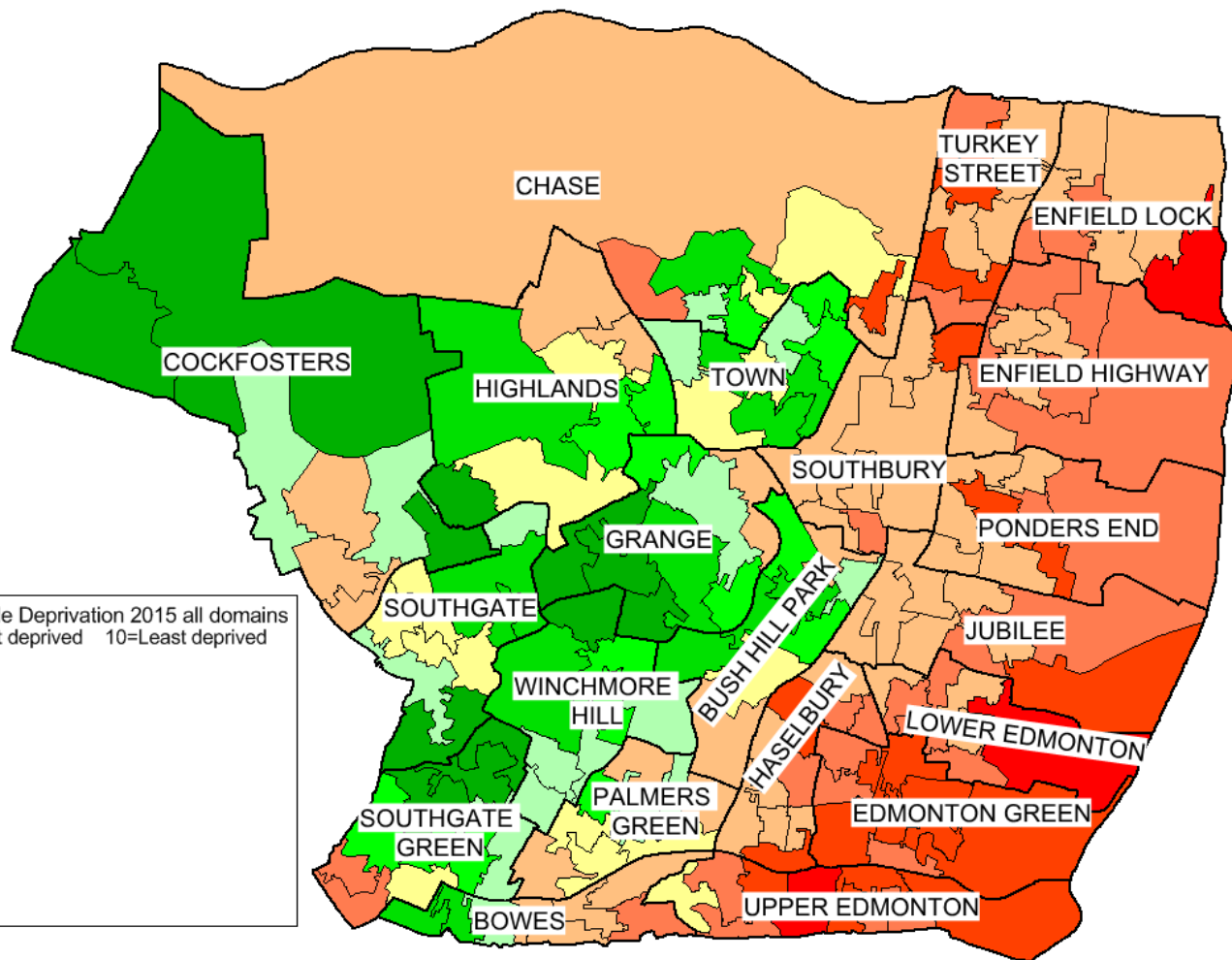
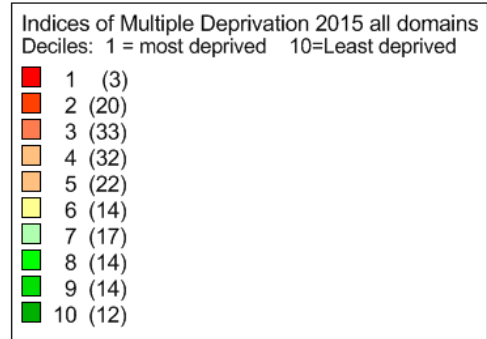
The main issue identified with this approach is access to the permit system for those who do not operate online. To mitigate this, people will be able to choose how they get renewal reminders (posted letters or email) and paper applications will be accepted.

It should be noted that the traffic orders for a number of controlled parking zones will have to be amended to allow for paperless permits. This will cost up to £10,000, which will be funded by income from the issuing of permits.

Appendix C – Mapping of Index of Multiple Deprivation, On-Street Parking Demand and Car Ownership

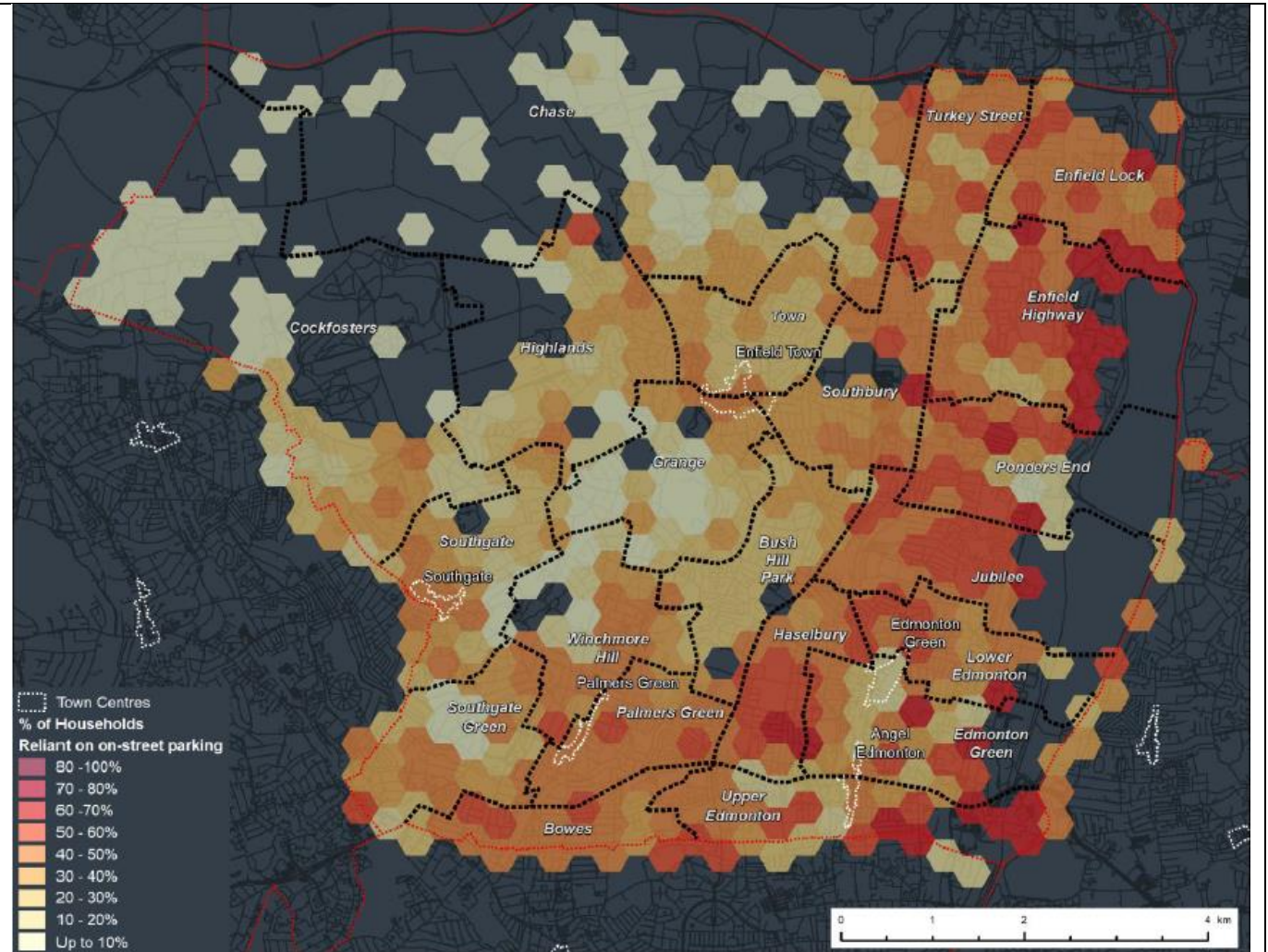
Index of Multiple Deprivation 2015

Source: ONS Update of Census 2011



% of Households Reliant on on-street parking

Source: Experian Mosaic Data



Car Ownership per Household

Source: 2011 Census

