

## London Borough of Enfield

### Portfolio Report

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

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**Subject:** Changes to Controlled Parking Zone Permit Charges

**Cabinet Member:** Cllr Rick Jewell, Cabinet Member for Environment

**Executive Director:** Joanne Drew (Acting), Place

**Ward:** All

**Key Decision:** KD 5546

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### Purpose of Report

1. This report seeks Cabinet Member approval to amend the price of parking permits applicable in controlled parking zones (CPZs) so that operating costs are fully recovered, and the scheme continues to contribute to the Council's wider transport objectives.

### Proposal

2. That notice is published pursuant to section 25 of the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 to vary existing orders created under section 46 of the Road Traffic Regulation Act 1984 to bring into effect the revised permit charges set out in Tables 5 to 8 in the report from 3<sup>rd</sup> January 2023.

### Reason for Proposal

3. The proposals are designed to support the Council's objectives to encourage active and sustainable transport in the light of a developing policy framework in London and locally. When operating CPZ's, the Council also aims to ensure that the cost of operating CPZs is fully recovered. The recent economic backdrop and inflationary pressures has generated an urgent need to adjust charges.

## Relevance to the Council's Plan

### 4. Good homes in well-connected neighbourhoods

The proposals will support good growth by helping to encourage a switch to more sustainable modes of transport and increasing the uptake of active travel whilst managing the available road network.

### 5. Safe, healthy and confident communities

The proposals will support the delivery of healthy streets by encouraging a switch to more sustainable modes of transport and increasing the uptake of active travel.

### 6. An economy that works for everyone

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

## Background

7. There are currently 28 CPZs across the Borough, including five on Council Housing sites. These comprise a mixture of types of CPZ, with some operating 'All Day' (typically 8am to 6:30 pm) and the others operating "Part-Day" (typically one-hour restrictions around stations to address commuter parking pressures). In addition, a large event-day CPZ was introduced in the south of the borough in August 2018 to help manage on-street parking during events at the Tottenham Stadium.

8. The total number of different permits issued in 2021/22 is set out in the table below:

**Table 1: Current Permits**

Permit Type	Number
Residents All Day*	2,205
Residents Part Day	1,903
Residents - Housing	58
Business All Day	39
Business Part Day	207
Visitor All Day	4,718
Visitor Part Day	2,373
Visitor Event Day	1,036
	12,536

\* Excludes permits for the South Edmonton Event Day CPZ, which are free

9. For each CPZ there are various permit types available, including resident, business and visitor permits.

10. The current permit charges are set out in the tables below:

**Table 2: Resident Permits – annual charge** (charges last amended in September 2016)

<i>Engine Size</i>	<i>All Day</i>	<i>Part Day</i>
1000cc or less (including electric vehicles)	£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

**Table 3: Business Permits** (charges last amended in July 2011)

<i>Duration</i>	<i>All Day</i>	<i>Part Day</i>
3 Months	£165.00	N/A
1 Year	£660.00	£60.00

**Table 4: Visitor Vouchers** (charges last amended in July 2011)

<i>Zone Type</i>	<i>Cost</i>
Part Day	£7.50 for 10 vouchers
All Day	£15.00 for 10 half day vouchers

11. At present, there is a limit of three permits per person, with the cost of second and third permits the same as 1<sup>st</sup> permits.

### **Operating Costs**

12. The cost of operating CPZs comprises both direct and indirect costs, including:

- Civil enforcement officers.
- Inspection and maintenance of signage and line markings.
- LBE staff and administrative costs.
- Contractor business support and overheads.
- LBE support services overheads

13. These costs have increased in recent years as a result of inflation etc, and it is now necessary to increase charges to ensure that costs are fully recovered.

### **Policy Context**

14. Since the previous changes to permit charges (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:

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 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).
Enfield Transport Plan (2019)	<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, including:</p> <ul style="list-style-type: none"> <li>• <b>Manage growing demand for on-street parking</b>, 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</li> </ul>
Climate Action Plan (2020)	<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.</p> <p>The plans sets out a number of actions including:</p> <ul style="list-style-type: none"> <li>• Limit the provision of car parking spaces on new developments in line with the New London Plan and better manage existing kerbside space.</li> </ul>
Air Quality Action Plan (2022)	<p>A number of air quality priorities are identified:</p> <ul style="list-style-type: none"> <li>• <i>make active travel the natural choice, particularly for those trips less than 2km (1.2 miles)</i></li> <li>• <i>make more school trips safe, sustainable and healthy</i></li> <li>• <i>reduce the impact of private vehicles on our streets (through a reduction in emissions)</i></li> </ul>

	<ul style="list-style-type: none"> <li>• <i>make the public transport network more accessible and the natural choice for longer trips</i></li> <li>• <i>reduce emissions from both existing buildings and new development.</i></li> </ul> <p>These priorities are supported by a number of actions, including by <b><i>managing growing demand for on-street parking.</i></b></p>
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15. Taking into account the above policy framework, the key objectives of the review of charges are to:

- Ensure that the cost of operating CPZs are fully recovered.
- Help rebalance kerbside space so that streets are less vehicle dominated.
- 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.
- Provide consistent and clear charges for permits for residents CPZs.

#### **Consultation 2020/21**

16. The following proposals relating to CPZ permits were consulted on between December 2020 and February 2021:

- Moving back to residents permit charges being linked directly to vehicle emissions rather than engine size.
- Increasing the cost of permits for the second and third vehicles in each household.
- Introducing a cap of three residents permits per household (rather than three per person per household).
- Changing the structure for visitor's vouchers so the initial annual allocation of permits is proportionate to hours when the CPZ operates. A higher charge was also proposed for additional permits once the annual allocation has been used.
- Introducing a paperless permit system for residents parking permits so there is no need to display a physical permit.

17. A total of 890 respondents completed the questionnaire, with the vast majority living in a property within a CPZ. The consultation prompted a mixed response with no clear consensus emerging. The table below sets out the original proposals and an assessment of these based on the responses received to the consultation and taking into account a range of operational factors:

Original Proposal	Assessment
A. Base residents' permit charges on vehicle emissions.	<p>There was some support for this approach. However, there were also points raised by respondents as well as wider considerations, which need to be taken into account:</p> <ul style="list-style-type: none"> <li>• Controlled Parking Zones currently cover a small proportion of the borough (around 15% of streets) so the wider impact of any changes will be limited.</li> <li>• Vehicle Excise Duty is already charged based on vehicle emissions so there is a general incentive to use less polluting vehicles.</li> <li>• The recently extended Ultra Low Emission Zone is already based on vehicle emissions.</li> <li>• Basing the charge to engine size retains an indirect link with emissions and also factors in use of kerb-side space (as vehicles with a larger engine size will tend to take up more space).</li> </ul> <p><b>Recommendation:</b> Retain current link between permit price and engine size.</p>
B. Increase the cost of permits for the second and third vehicles in each household.	<p>There was support for this approach. However, there were also points raised by respondents as well as wider considerations, which need to be taken into account:</p> <ul style="list-style-type: none"> <li>• The changes could have a financial impact on low-income households with two adults who both drive a vehicle as part of their work.</li> <li>• Some ethnic groups have larger household sizes. Whilst this is true, it must be balanced against the wider needs of local communities, including the circa 33% of people who do not own a vehicle.</li> </ul> <p><b>Recommendation:</b> Introduce uplift for 2<sup>nd</sup> and 3<sup>rd</sup> permits.</p>
C. Each separate household in a controlled parking zone will be issued a maximum of three residents parking permits.	<p>There was support for this approach. However, there were also points raised by respondents as well as wider considerations, which need to be taken into account:</p> <ul style="list-style-type: none"> <li>• This proposal would have an impact on people living in HMOs, where the household is made up of adults.</li> <li>• The proposal would have a disproportionate impact on certain ethnic groups, which have a higher propensity to live in larger households.</li> </ul> <p><b>Recommendation:</b> Defer introduction of the household cap whilst carry out further review.</p>



D. Alter the structure for visitor's vouchers.	<p>There was support for this approach, although it was not overwhelming, and a number of concerns were raised about the details of the proposal.</p> <p><b>Recommendation:</b> Defer introduction of changes to visitor permit structure.</p>
E. Introduce a paperless permit system.	<p>There was support for this approach, although there were a number of people raising concerns about how they would know if a vehicle had a valid permit.</p> <p><b>Recommendation:</b> Continue to issue physical permits in the short-term.</p>

### Proposed Permit Prices

18. Parking charges must not be used to raise revenue. However, it is also the case that the objective when setting charges does not necessarily have to be revenue neutrality. Nevertheless, the approach adopted by the Council is to ensure that both the direct and indirect costs of operating permit parking schemes are fully recovered. Should there be any surplus, the Road Traffic Regulation Act 1984 specifies that this can only be used for specified transport and highway purposes.

### Residents Permits

19. Various alternative options have been considered but, taking into account the consultation responses, it is proposed to retain the current link between permit price and engine size as this offers a number of advantages:

- It is already a well-established approach, understood by residents.
- It provides a proxy for vehicle size, maintaining a link to the amount of road space they occupy.
- It maintains a link to air quality, with larger/heavier vehicles tending to produce higher levels of emissions and harmful particulates.

20. To simplify the structure and to deter use of the largest vehicles, the number of bands is reduced from six to four, with any vehicles over 2,000cc being in the same band.

21. Since September 2016, CPZ operational costs have increased and are forecast to increase further during 2023/24. It is proposed that prices should reflect these increases. In addition, an uplift of 25% is proposed for second and third permits to deter car ownership and support the Council's wider strategic aims to promote active travel.

**Table 5: Proposed Price for Residents Permit in All-Day CPZ (>4 Hours)**

Engine Size	1 <sup>st</sup> Permit	2 <sup>nd</sup> Permit +
1000cc or less + EVs	£77	£95
1001cc to 1600cc	£155	£195
1601cc to 1999cc	£230	£290



>2000cc	£395	£495
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**Table 6: Proposed Price for Residents Permit in Part-Day CPZ (<4 Hours)**

Engine Size	1 <sup>st</sup> Permit	2 <sup>nd</sup> Permit +
1000cc or less + EVs	£38.50	£47.50
1001cc to 1600cc	£77.50	£97.50
1601cc to 1999cc	£115	£145
>2000cc	£197.50	£249

### Visitor Permits

22. The price of visitor permits has not increased since 2011, making them effectively a third cheaper now in real terms. It is therefore proposed to increase the price of visitor permits in line with the increase in our cost base.

**Table 7: Proposed Prices for Visitor Permits (Vouchers)**

Zone Type	Cost
Part Day	£10.50 for 10 vouchers
All Day	£21.00 for 10 half-day vouchers

23. To assist residents, it is proposed to remove the current cap of 50 visitor vouchers per year. The impact of this change will be monitored, and vouchers may be restricted if it is clear that they are not being used for personal use.

### Business Permits

24. The number of business permits in the Borough is relatively low, with 39 permits issued for All-Day zones and 210 for Part-Day Zones, over half of which are for the Winchmore Hill CPZ.

25. The cost of business permits has not increased since 2011 and to reflect our cost base these must now increase as follows:

**Table 8: Proposed Prices for Business Permits**

Duration	All Day	Part Day
3 Months	£230	N/A
1 Year	£920	£85

### Main Considerations for the Council

26. The main considerations for the council are whether the proposed changes meet the 5 key objectives set out in paragraph 13 above.

Objective		Comment
Help rebalance kerbside space so that streets are less vehicle dominated.	✓	Retaining the link between permit price and engine size will help ensure that larger, more dominant vehicles pay more for permits. This will help act a deterrent to ownership of such vehicles.

Increase the proportion of trips made by active and sustainable modes in line with the Mayor of London's Transport Strategy.	✓	Increasing the price of permits should help, as part of a wider strategy, to promote sustainable travel, making it clear that kerb-side space is a valuable, finite resource.
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.	✓	Although engine size is not directly linked to vehicle emissions, it nevertheless provides a useful proxy for emissions that also factors take-up of kerbside space. Increasing permit prices will therefore help promote a switch to more efficient vehicles.
Provide consistent and clear charges for permits for residents CPZs.	✓	The existing link to engine size is well understood by residents and has been simplified further by reducing the number of charging bands from six to four. The reduction in the number of bands also means that the largest vehicles pay proportionately more for a permit.
Ensure that the cost of operating CPZs are fully recovered.	✓	The uplift in permit prices will help ensure that permit parking schemes are covering their total costs.

### **Safeguarding Implications**

27. None identified.

### **Public Health Implications**

28. 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.

29. 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.

30. 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.
31. 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.
32. 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.
33. Overall, the proposals will encourage sustainable and active travel, helping us to manage environmental problems related to congestion and local air quality, while also reducing our impact on climate change and improve health, safety and accessibility for all in our communities. This supports Public Health's efforts to embed Health in all Policies across the Council.

### **Equalities Impact of the Proposal**

34. An equality impact assessment of the proposed changes has been carried out and is appended as Appendix 1. The key remaining impacts on protected groups are:

<i>Area</i>	<i>Potential Impact</i>	<i>Mitigation</i>
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). However, private vehicle ownership per household is lower in these areas reducing the overall negative impact.

35. As a result of the impact assessment, the original proposal to limit the number of permits per household is not being taken forward at this stage to enable further investigation to determine whether this would disadvantage large, multi-generational households.

### **Environmental and Climate Change Considerations**

36. 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.

37. Implementing the proposals will achieve a number of benefits:

<i>Proposal</i>	<i>Carbon Emissions Impact</i>
Increased charges linked to engine size.	Will directly encourage private vehicle owners to move to low carbon and carbon neutral vehicles.
Graduated permit charges are introduced with higher rates for second and third permits.	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.
Lower charge for electric vehicles	Will help incentivise uptake of electric vehicles.

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

38. These risks have been identified:

<b>Risk Category</b>	<b>Risks</b>
<b>Financial</b>	Not fully recovering the cost of providing, enforcing and maintaining CPZs.
<b>Reputational and Strategic</b>	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, or other key strategic transport objectives.

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

39. These risks have been identified:

Risk Category	Comments/Mitigation
<b>Reputational</b>	<p><b>Risk:</b> Public criticism of increased charges at a time of pressures on household budgets.</p> <p><b>Mitigation:</b> Charges have not been increased since 2016 (residents permits) and since 2011 (business and visitor permits). Discount proposed for those in receipt of Council Tax Support</p>
<b>Regulatory</b>	<p><b>Risk:</b> Incorrect procedure for implementing new charges.</p> <p><b>Mitigation:</b> Legal advice obtained to confirm correct procedure</p>
<b>Financial</b>	<p><b>Risk:</b> Costs of operating CPZs not fully recovered.</p> <p><b>Mitigation:</b> Regular monitoring of parking accounts takes place and further adjustments to charges could be made if necessary.</p>

## Financial Implications

40. An assessment of the revenue implications of the proposed changes has been undertaken and, based on the proposals as outlined, it is estimated that an additional £211k will need to be generated in order to ensure cost recovery for this function.

41. The current costs and receipts are summarised in the table below, along with the net budget gap/deficit of £211k and forecast effect of the proposed increase in permit prices, which brings the Council's current budget deficit of £211k to a neutral position:

<b>Current Estimated Permit Costs and Income</b>	
	<b>Estimated Costs (000s)</b>
Staffing and Management Cost	£73
Service Operating Costs	£2
Total CEO Enforcement Costs	£514
NSL Other Costs	£462
Premises Costs	£13
Central Support Services	£24
<b>Total Cost</b>	<b>£1,089</b>

	<b>Estimated Income (000s)</b>
Residents Permits Receipts	-£398
Visitors Scratch Receipts	-£101
Business Permits	-£33
Permits/CPZ PCN Receipts	-£346
<b>Total Receipts</b>	<b>-£877</b>
<b>Net Estimated Budget Gap/Deficit</b>	<b>£211</b>
Note: Council needs to increase permit and scratch card costs by £211k to mitigate the loss incurred in providing the service	
<b>Proposed Estimated Permit Income</b>	
	<b>Estimated Income (000s)</b>
Table 5: Proposed Price for Residents Permit in All-Day CPZ (>4 Hours)	-£379
Table 6: Proposed Price for Residents Permit in Part-Day CPZ (<4 Hours)	-£169
Table 7: Proposed Prices for Visitor Permits (vouchers)	-£141
Table 8: Proposed Prices for Business Permits	-£54
CPZ PCN Receipts	-£346
<b>Total Receipts</b>	<b>-£1,089</b>
<b>Revised Budget Gap/Deficit (with effect of proposed price uplifts)</b>	<b>£0</b>

## Legal Implications

42. By virtue of the Road Traffic Regulation Act 1984 Section 122 the Council has a duty to secure the provision of suitable and adequate parking facilities on and off the highway.
43. Using powers provided by Section 45(1) and (2) (b) a local authority may by order make and prescribe charges for vehicles left in designated parking places and in connection with the issue of a permit. Section 46 prescribes that charges shall be made by an order of the Council and Section 46A allows such charges may be varied by notice. The procedure for varying charges pursuant to Section 46A is set out in Regulation 25 of the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996.
44. The making of charging tariffs must be concerned with the expeditious, convenient and safe movement of traffic and the provision of suitable and adequate parking facilities on and off the highway. The permit charges will generate revenue, but the charging level must not be set with a view to making a surplus. Any surplus that is generated can only be used for the

specific purposes set out in Section 55 of the Road Traffic Regulation Act 1984.

45. Regard must be had to the Council's public sector equality duty and the impact of the proposals on those with different protected characteristics.

### **Workforce Implications**

46. None identified

### **Property Implications**

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

### **Other Implications**

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

### **Options Considered**

49. A number of alternative options have been considered, as summarised in the table below:

Flat rate for residents' permits (e.g. £150 for All Day Zones and £75 for Part Day Zones)	Whilst this simplifies the current charging structure, it means that those with the smallest vehicles face an increase in charges whilst those with the largest vehicles would see a reduction.
Discount for electric vehicles	With electric vehicles still relatively expensive, a discount is unlikely to be a major factor when choosing whether or not to purchase an electric vehicle. In addition, a discount is likely to benefit those on higher incomes.
Direct link to CO <sub>2</sub> emissions	A direct link to offers some benefit but, on balance, is not recommended as both VED and the ULEZ already take emissions into account. Retaining the link to engine size provides a proxy for both emission and vehicle size.

## **Conclusions**

50. The proposed increase in permit prices seeks to ensure that the cost of implementing, operating, enforcing and maintaining CPZs are fully recovered. In addition, the suggested prices have been set to discourage use of the larger vehicles, as well as multiple car ownership, to help the Council meet its wider climate and transport objectives.

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## **Appendices**

1. Equality Impact Assessment

## **Background Papers**

No background papers have been relied on in the preparation of this report.