

Overview and Scrutiny Committee – 24 May 2023

Officer Response: Conservative Group Call-in by Cllr Alessandro Georgiou of Decision List 57 (22-23) - Key Decision 5588 - On & Off-Street Parking Charges

Reasons for the “Call in” are detailed below:

Reason for call-in
<p>Now is not the right time – At a time when thousands in Enfield are struggling it is morally unjust to be increasing parking charges to shop, care for loved ones or even visit the civic centre.</p>
Officer response
<p>The Council is both the statutory Highway and Traffic Authority for all public roads in the Borough, apart from the M25, A10 and A406. As such, the Council has a duty pursuant to the Traffic Management Act 2004 to manage its network with a view to achieving (so far as may be reasonably practicable having regard to their other obligations, policies and objectives) the following objectives:</p> <ul style="list-style-type: none">(a) securing the expeditious movement of traffic on the authority's road network; and(b) facilitating the expeditious movement of traffic on road networks for which another authority is the traffic authority <p>The legislation makes clear that the term “traffic” includes pedestrians. So the duty requires Local Traffic Authorities to consider the movement of all road users: pedestrians and cyclists, as well as motorised vehicles – whether engaged in the transport of people or goods.</p> <p>This statutory duty echoes that set out in Section 122 of the Road Traffic Regulation Act 1984, which requires the Council 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’.</p> <p>Whilst the current pressures on cost of living are recognised, the Council nevertheless has a duty to actively manage its network, including by reviewing parking charges to meet wider strategic objectives.</p> <p>The impact of proposed charges on people who are disadvantaged due to socio-economic factors is considered in the Equality Impact Assessment. This acknowledges that there could be some impact on people on low incomes, but also highlights that there are times when parking remains free and outlines alternative options to car use.</p>

Reason for call-in
<p>The ‘stress test’ - this stress test was undertaken in December. It is obvious that during December people are shopping for Christmas presents or visiting their family and friends. It would appear that the test being done during this period is unfair and seeks to deliberately skew the results. Furthermore, the use of this method of judging</p>

increases is perverse. We will be penalising residents because during this period parking was being used. The Council should not be in the business of attempting to artificially limit supply due to increased demand. We are not a business, we are a civic service provider.

Officer response

The Chartered Institution of Highways and Transportation (CIHT) document 'Parking Strategies and Management'¹ makes reference to the need to manage parking demand and to setting charges and controls at a level that 'will keep peak demand at no more than about 85% of capacity'. Although published in 2005, this remains a widely adopted threshold when assessing appropriate charges as above this level the risks set out in paragraph 9 of the report are increasingly likely.

Usage surveys were carried out on Saturday 3rd December and Wednesday 7th December, before the busiest pre-Christmas period.

On-street prices are also set higher than off-street spaces to encourage motorists to park in car parks, freeing up the highway to facilitate the movement of both people, buses and other vehicles.

Reason for call-in

Standardising parking charges – it is obvious that we should be encouraging investment into those parts of the borough that are more deprived. If you increase parking charges in a more deprived part of the borough to equalise the parking rates to the level of a less deprived area you will reduce vital money being spent in those local communities. Surely this policy would act as a deterrent to those wishing to shop in businesses that desperately need more customers.

Officer response

The London Plan (Policy SD6) emphasises the need to promote town centre vitality and viability by a range of means including by delivering '*sustainable access to a competitive range of services and activities by walking, cycling and public transport*'. This is developed further in the emerging Local Plan where, for example, Draft Strategic Policy TC1 sets out how the long term vitality and viability of Enfield's town centres will be secured by, amongst other things, '*managing streets and spaces to facilitate pedestrian and cycle movement, improve links to surrounding areas and reduce traffic flows along key routes*'.

It should also be noted that the Council does not manage all of the car parks within the various town centres. The table below summarises the management and cost of town centre parking, assuming a stay of up to 3 hours:

¹ https://www.britishparking.co.uk/write/Documents/Library/Parking_Management_and_Strategies-IHT.pdf

Town Centre	Non-LBE Car Parks	LBE Car Parks (spaces)
Enfield Town	Palace Exchange (500 spaces) £2.80 for up to 3 hours	Palace Gardens (523) Little Park Gardens (99) Sydney Road (67) New River Loop (46) Church Lane (16) Genotin Road (96) ² £2.80 for up to 3 hours Free for 3 hours on Sundays
Edmonton Green	Shopping Centre (994) £3 for up to 3 hours Free for Asda customers spending >£10	Lion Road (19) £2.80 for up to 3 hours Free for 3 hours on Sundays
Southgate	Asda Free for customers for max. 2 hours. Penalty charge if stay >2hours	Minchenden (100) £2.80 for 3 hours Free for 3 hours on Sundays
Angel Edmonton	Lidl Free for customers for max. 1.5 hours. Penalty charge if stay >1.5 hours	Raynham Road (53) Fairfield Road (27) £2.80 for 3 hours Free for 3 hours on Sundays
Palmers Green	Morrisons Free for customers for max. 2 hours. Penalty charge if stay >2hours	Lodge Drive (171) £2.80 for 3 hours 20 bays - free 45 mins

This indicates that the proposed charges for Council operated car parks are broadly consistent with privately operated car parks. However, a key difference is that all Council operated car parks continue to offer free parking for up to 3 hours on Sundays.

The table below summarises the number of on-street Paid for Parking² (PfP) bays in the east of the Borough:

Area	No. PfP Bays
Angel Edmonton	90
Edmonton Green	36
Enfield Highway	2
Ponders End	24

Both Ponders End and Edmonton Green have a relatively small number of PfP bays, and alternative off-street opportunities in the form of Tesco in Ponders End and the Shopping Centre in Edmonton Green. Angel Edmonton and Enfield Highway have more significant levels of PfP bays and therefore

² Formerly Pay & Display bays

perhaps more sensitive to the increase in charges. However, both of these area experience relatively high levels of stress, with Angel Edmonton reaching 97% (Saturday) and 92% (weekday) and Enfield Highway reaching 95% (Saturday) and 88% (weekday), justifying the need for the price increase.

Reason for call-in

Shorter parking – one of the stated aims is to encourage shorter parking periods. This does not require increases in charging to deter commuters. Simply reduce the parking period if that is the stated aim. To make clear we do not endorse that policy but it provides an alternative when clearly none have been comprehensively explored.

Officer response

All on-street PFP bays have a maximum stay of 2 hours, apart from the 23 bays in the vicinity of the North Middlesex Hospital which allow parking for up to 4 hours to reflect the fact that visitors to the hospital may need longer to attend appointments or to visit friends and relatives.

Paragraphs 22-25 of the report set out a number of other options that were considered, including reducing the maximum length of stay. However, this was not recommended as a one hour limit, for instance, might benefit some high street businesses but could have an adverse impact on others that rely on longer stays, such as restaurants and hair dressers.

Reason for call-in

Public transport – clearly whoever drafted this report has not fully understood the limited transport links in some parts of Enfield.

Officer response

The main areas impacted by the new charges are town centres, i.e. Enfield Town, Edmonton Green, Angel Edmonton, Palmers Green and Southgate.

Public transport accessibility can be measured using an index developed by Transport for London which categorises London into Public Transport Access Levels. As can be seen, in the image attached, the PTAL score for each of the town centres is relatively good, indicating that public transport is a realistic option for many people. The PTAL score for each town centre is:

Enfield Town – PTAL 6a
Edmonton Green – PTAL 6a
Angel Edmonton – PTAL 5
Palmers Green – PTAL 3
Southgate – PTAL 6a

It is acknowledged that not all of the PFP bays are within the main town centres, with several bays also in Ponders End (24), Enfield Highway (56), Cockfosters (140) and Winchmore Hill (47). Whilst the PTAL scores for these locations are generally lower than those for the town centres, all are accessible by public transport.

Ponders End – PTAL 4
Enfield Highway – PTAL 2
Cockfosters – PTAL 3

Reason for call-in

Reputational mitigation – this is the most disturbing part of the report. The Council is admitting is charging people more to force them out of the cars. If you are pregnant, disabled, elderly have children or are a carer and do not qualify for a blue badge or other permissions you are being told that the method of transport that is most accessible to you is no longer a viable financial option.

Officer response

The report summarises the current transport policy context and the overarching aim to increase the proportion of trips utilising public transport and active travel modes. Managing the supply and demand for parking forms part of the strategy to influence mode choice, along with investment in active travel measures in recent years.

The use of parking charges to influence mode choice is consistent with local, London-wide and national policy and widely used by most authorities. The charges of adjoining boroughs have been assessed to benchmark the proposed increases. These are set out in Appendix 1 of the report and summarised below for selected key times:

On-Street:

Authority	On-Street – Up to 1 Hour	On Street – Up to 2 hours
Enfield (Proposed)	£2.80	£5.60
Waltham Forest	£2.50 cashless £2.70 cash	£4.20 cashless (up to 3 hours)
Barnet	£1.41-£2.86	£2.11-£6.41
Haringey	Band 1 - £3.30 (£4.13 diesel) Band 2 - £2.10 (£2.63 diesel) Band 3 – 1.30 (£1.63 diesel)	Band 1 - £6.60 (£8.25 diesel) Band 2 - £4.20 (£5.25 diesel) Band 3 – £2.60 (£3.25 diesel)

Off-Street

Authority	Off-Street – Up to 2 Hours	Off-Street – Up to 3 hours
Enfield (Proposed)	£2.80	£2.80
Waltham Forest	£2.70-£4.40	£3.70-£6.00
Barnet	£1.41-£2.82	£2.11-£7.05
Haringey	£2.40 (£3 diesel)	£2.40 (£3 diesel)

Finally, the impact of the proposed charges on people with protected characteristics was set out in the Equality Impact Assessment and is considered further below.

The EQIA's were developed, considered and reviewed by Parking Services with assistance from the

Council's team who have specialised knowledge and experience in this field. The EQIA was also reviewed by our legal experts to ensure compliance with the Equality Act 2010

Reason for call-in

EQIA – Older residents - Any parking charge increase may affect those motorists who rely on a pension

Officer response

The EQIA acknowledges this when considering the impact of the proposals on people of a specific age or age group:

'Any parking charge increase may affect those motorists who rely on a pension however the Council has a responsibility to manage kerb space. As an affordable alternative to car ownership for residents, older people of pensionable age are eligible for free travel across London and free local bus journeys nationally'.

Reason for call-in

EQIA – Blue badge holders – not all disabled residents have a blue badge. The EQIA conveniently fails to mention this and is another key reason why this decision should not proceed as is.

Officer response

People will automatically qualify for a blue badge if they meet one of the specified criteria³. However, there are a number of other factors that may lead to a blue badge being issued, mainly relating to difficulty either planning or undertaking journeys due to limited mobility.

Residents are signposted to the blue badge application process on the Council website to help determine eligibility. We will continue to encourage those who believe that they require a blue badge to apply to receive the relevant help they are entitled to.

Reason for call-in

EQIA – Pregnancy – Once again another disgraceful bit of misleading nonsense. We are talking about parking charges across the whole Borough and not just around the North Middlesex Hospital. Pregnant women who may need to use their cars will be penalised.

Officer response

The EQIA did not identify any differential negative impact on those who are pregnant, but this will continue to be monitored.

³ <https://www.gov.uk/government/publications/blue-badge-can-i-get-one/can-i-get-a-blue-badge>

The North Middlesex Hospital example was used to show that provision is made for parking for up to four hours to cater for those attending or visiting the hospital who might need to stay longer than the normal maximum two hours permitted in Pay for Parking bays.

It should also be noted that the longer on-street tariffs (3-4 hours in length) are only available around North Middlesex with all other off-street bays being limited to a maximum of 2 hours. This is to further assist those who require longer to park whilst visiting the Hospital.

Reason for call-in

EQIA – Socio Economic Deprivation – According to the EQIA “Any parking charge increase may affect those motorists whose may have a low household income”. Obviously, and for this reason this policy should be stopped.

Officer response

As the EQIA states: ‘any parking charge increase may affect those motorists who may have a low household income. However, the Council has a responsibility to manage kerb space’. This is in line with the Council’s Network Management Duty pursuant to the Traffic Management Act 2004.

The EQIA also makes it clear that according to TfL’s data the most commonly used form of transport for those earning below £20,000 is walking followed by public transport (buses) with only 42% of Londoners earning £20,000 or less owning a vehicle. It should also be noted that parking is currently it is still free for three hours on Sundays in all Council car parks.

There is a clear inverse relationship between car ownership and socio-economic deprivation, with the following wards having particularly low levels of car ownership:

Ward	% No Cars/Vans in Household⁴
Edmonton Green	50%
Lower Edmonton	43%
Upper Edmonton	43%
Borough Average	31%

Finally, the EQIA emphasises that the Council is also investing in various cycle schemes to provide a healthy and cheap alternative to car use.

Proposal: Councillor Georgiou has asked that the decision is referred back to the decision maker.

⁴ Based on 2021 Census

Public Transport Access Levels (PTALs)

2019

Enfield

Legend

PTAL

- 0
- 1a
- 1b
- 2
- 3
- 4
- 5
- 6a
- 6b

- Rail Stations
- LU Stations
- DLR Stations
- Tram Stops

For more information, including analysis assumptions and caveats, please consult WebCAT, TfL's connectivity toolkit. <https://tfl.gov.uk/webcat>

Drawn by: SGC Date: 10/02/2020

