CABINET MEMBER SIGNING

Wednesday, 5th February, 2025, 12.00 pm - George Meehan House 294 High Road Wood Green N22 8JZ (watch the live meeting <u>Here</u>)

Councillor Seema Chandwani – Cabinet Member for Tackling Inequality and Resident Services

Quorum: 1

1. FILMING AT MEETINGS

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2. APOLOGIES FOR ABSENCE

To receive any apologies for absence.

3. URGENT BUSINESS

The Chair will consider the admission of any late items of Urgent Business. (Late items of Urgent Business will be considered under the agenda item where they appear).

4. DECLARATIONS OF INTEREST



A member with a disclosable pecuniary interest or a prejudicial interest in a matter who attends a meeting of the authority at which the matter is considered:

(i) must disclose the interest at the start of the meeting or when the interest becomes apparent, and

(ii) may not participate in any discussion or vote on the matter and must withdraw from the meeting room.

A member who discloses at a meeting a disclosable pecuniary interest which is not registered in the Register of Members' Interests or the subject of a pending notification must notify the Monitoring Officer of the interest within 28 days of the disclosure.

Disclosable pecuniary interests, personal interests and prejudicial interests are defined at Paragraphs 5-7 and Appendix A of the Members' Code of Conduct

5. DEPUTATIONS / PETITIONS / QUESTIONS

To consider any requests received in accordance with Standing Orders.

6. AUTHORITY TO ISSUE REQUIRED DELEGATED AUTHORITY TO ISSUE FPNS AS PART OF ENVIRONMENTAL ENFORCEMENT SERVICES CONTRACT (PAGES 1 - 6)

7. PARKING STRATEGY AND POLICY/CHARGES REVIEW - FEEDBACK TO STATUTORY CONSULTATION (PAGES 7 - 100)

8. NEW ITEMS OF URGENT BUSINESS

As per item 3.

Ayshe Simsek, Democratic Services and Scrutiny Manager Tel – 020 8489 2929 Fax – 020 8881 5218 Email: ayshe.simsek@haringey.gov.uk

Fiona Alderman Assistant Director of Legal & Governance (Monitoring Officer) George Meehan House, 294 High Road, Wood Green, N22 8JZ

Tuesday, 28 January 2025

Agenda Item 6

Report for:	Cabinet Member Signing – Non key decisions
Title:	Authority to issue required Delegated Authority to issue FPNs as part of Environmental Enforcement Services contract
Report authorised by:	Barry Francis
Lead Officer:	Beth Waltzer, Head of Recycling, Waste and Enforcement
Ward(s) affected:	All
Report for Key / Non Key Decision:	Non Key Decision

1. Describe the issue under consideration

- 1.1 This report follows the report to Cabinet at its meeting of 15 November 2024 where it was agreed to award the Environmental Enforcement Services Contract (the Contract) to Kingdom Services Group Limited (Kingdom) for a 1-year contract plus a 1-year extension ("the award decision").
- 1.2 This decision authorises the grant of the authority required for Kingdom, and its employees, to have the authority to issue Fixed Penalty Notices (FPNs) on the behalf of the Authority. This includes authority to issue FPNs under the Environmental Protection Act 1990, Anti-Social Behaviour, Crime and Policing Act 2014 and Highways Act 1980.

2. Cabinet Member Introduction

3. Recommendations

- 3.1 Authorise the Assistant Director Environment to agree variations to the Contract to the extent required to give Kingdom the function and authorise it to issue Fixed Penalty notices and warning notices and require payment of fixed penalties under the legislation set out at 3.2.1 3.2.6.
- 3.2 Authorise the Assistant Director Environment to authorise employees of Kingdom to issue Fixed Penalty Notices and warning notices and require payment of fixed penalties under the legislation set out at 3.2.1 3.2.6.
- 3.2.1 S88(10) of the Environmental Protection Act 1990 (EPA 1990), to issue FPNs under s87(1)of that Act EPA 1990;
- 3.2.2 s33ZA(12) of EPA 1990 to issue FPNs for offences under s33 of that Act

- 3.2.3 s34ZA(12) of EPA 1990 to issue FPNs for offences under s34 of that Act
- 3.2.4 s47ZA(10) of EPA 1990 to issue FPNs for offences under s47 of that Act
- 3.2.5 s68(11) of the Anti-Social Behaviour, Crime and Policing Act 2014 to issue FPNs for offences under s63 and s67 of that Act
- 3.2.6 s21 of the London Local Authorities Act 2003, to issue FPNs under sections 132(1), 137(1), 139(3), 161(1) and 169(5) of the Highways Act 1980

4. Reasons for decision

- 4.1 A procurement process was undertaken to find a suitably qualified organisation to provide environmental enforcement services which resulted in Award of Contract to Kingdom in November 2024.
- 4.2 For Kingdom to undertake the Services as part of the Contract, Kingdom, must have the function of giving notices, and its employees must be authorised to give them.
- 4.3 Litter and fly-tipping are amongst the biggest concerns for the residents of Haringey, and the issues are noticeable across the borough. Education and enforcement have a significant role to play in reducing the amount of litter and fly-tipping on our streets and changing people's behaviours and attitude.
- 4.4 Under the 'A cleaner, low waste Haringey' theme of the Council's Corporate Delivery Plan 2024 -2026, the Council has set an activity for 'Enhanced environmental enforcement, including targeted deployed (Monday Sunday) of proactive litter & waste enforcement patrols in Town Centres and hot spot locations across the borough'.

5. Alternative options considered

- 5.1 The Council could do nothing, and Kingdom will be unable to issue FPN's as detailed. The Council requires support to enforce this legislation and hence will be at risk of failure to do so.
- 5.2 The Council could stop undertaking enforcement action against those who are purposefully dropping litter and dumping waste across the borough. Without education and a deterrent, his could lead to an increase in instances of littering and dumping waste across the borough. This would have impacts on other services, such as the street cleansing, but also impact on the satisfaction of residents, businesses and visitors. This would mean that the Council does not complete an activity as set out within the Corporate Delivery Plan 2024 2026. Therefore, this is not recommended.

6. Background information

6.1 Following a competitive procurement process, the Contract was awarded to Kingdom in November 2024. The services are due to commence in January 2025.

- 6.2 The paper presented to Cabinet on 15 November 2024, contained provision to give delegate authority to Kingdom to have the function of issuing notices under the relevant legislation. However, on a further review, it was determined that the delegation was not strong enough to allow Kingdom employees to issue notices.
- 6.3 The core services of the Contract are to undertake education with residents to reduce littering, but also to undertake enforcement under the applicable legislation for violations, such as littering.
- 6.4 Updated recommendations have been drafted following additional governance advice and to ensure that Kingdom employees are able to deliver against the Contract when it commences in January 2025.

7. Contribution to the Corporate Delivery Plan 2022-2024 High level Strategic outcomes?

- 7.1 This decision relates to the Responding to the Climate Emergency theme of the Corporate Delivery Plan, specifically supporting the outcome areas of A cleaner, low waste Haringey.
- 7.2 This service is set out as an Activity within the Corporate Delivery Plan, to enhance environmental enforcement, including targeted deployed (Monday Sunday) of proactive litter & waste enforcement patrols in Town Centres and hot spot locations across the borough.

8. Carbon and Climate Change

8.1 This decision has no climate change impact, as it solely focuses on a governance requirement for a previous decision.

9. Statutory Officers comments (Director of Finance (procurement), Head of Legal and Governance, Equalities)

Finance

- 9.1 The Environmental Enforcement Contract was awarded to Kingdom Services Group Limited (Kingdom) in November 2024 for an estimated total value of £1,396,212 for a 1-year contract plus 1 year extension in line with CSO 9.07.1(d). The expected value of income to the council is £1,396,212 for one year, which is 65.5% of the total income of £3,216,000 that would be generated from issuing the FPN's. The balance 34.5% of the income estimated at £721,188 per year would be assigned to the contractor to cover the costs of providing the services.
- 9.2 The estimation is based on the contractor issuing 1,072 FPNs each year with an average value of £250. The assumption is that 65% of the FPN's issued would be paid within the year.
- 9.3 There are no risks to the council envisaged at this stage.

Procurement

- 9.4 Strategic Procurement have been consulted in the preparation of this report.
- 9.5 A compliant open tender process was undertaken in accordance with CSO 9.01.2 (a) where an advertisement was placed in the public domain for prospective suppliers to submit their tender proposal.
- 9.6 Strategic Procurement see no reason that the Delegated Authority for this contract is approved in accordance with the report.

Head of Legal & Governance

- 9.7 The Assistant Director Legal and Governance has been consulted in the preparation of this report.
- 9.8 The legislation set out in the recommendations requires the giver of the notices to be given the function of doing so and authorised to do so by the Council.; and employees of such a person must separately be so authorised. This was not dealt with in the award decision.
- 9.9 The award decision was a key decision because of the value involved; The recommendations in this report do not affect the contract value and a decision to adopt them is not otherwise a key decision.
- 9.10 The Assistant Director Legal and Governance sees no legal reasons preventing the approval of the recommendations in the report.

Equality

9.11 This decision has no equality impact, as it solely focuses on a governance requirement for a previous decision.

10.Use of Appendices

10.1 n/a

11.Background papers

11.1 n/a

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Agenda Item 7

Report for:	Cabinet Member signing
Title:	Parking Strategy and Policy/Charges Review – feedback to statutory consultation
Report authorised by:	Barry Francis, Director of Environment and Resident Experience. barry.francis@haringey.gov.uk
Lead Officer:	Ann Cunningham Head of Highways and Parking ann.cunningham@haringey.gov.uk,
	Abdul Sahed, Parking Business Manager abdul1.sahed@haringey.gov.uk

Ward(s) affected: All

Report for Key/ Non-Key Decision: Key decision

1. Describe the issue under consideration

- 1.1. Parking management is an important tool in tackling inequality, responding to the climate emergency and improving health. In July 2024, the Cabinet approved a new Parking Strategy, designed to foster a cohesive and forward-thinking approach to parking management. That strategy provides the framework to alleviate congestion, support local businesses, improve air quality, and enhance the overall vitality of Haringey's diverse community.
- 1.2. At that meeting, Cabinet also approved the proposed changes to parking policy and parking charges to support the delivery of that new strategy, prior to a decision being taken and, following the completion of the required statutory consultation, whether to amend the relevant traffic management orders or not. The changes to parking policy and charges that were approved in the July 2024 Cabinet report are set out in detail in Appendix D of that report, and are summarised below:
 - The introduction of a new parking permit charge band for fully electric vehicles, with a resulting change to all other parking permit charge bands.
 - A new parking permit surcharge for larger vehicles 5% for medium length vehicles (4m-4.49m) and 10% for longer length (4.5m+)vehicles.
 - Surcharges applying to second and subsequent parking permits to become incrementally higher depending on the number of vehicles per household. This surcharge is to extend to business parking permits.
 - The introduction of parking charges for electric vehicles (EVs) using paybyphone and contactless parking bays and when parking in EV charging bays.
 - Administration fees to apply to rejected permit applications and to change of address applications. The introduction of a 21-day temporary vehicle cover (£40) for business, boroughwide and utility, essential service and doctor permits. This already applies to residential parking permits.

- The introduction of hourly business visitor parking permits limited to 100 per annum.
- The introduction of a non-resident Blue Badge holder permit for those who work in the borough.
- The withdrawal of daily visitor parking permits.
- 1.3. This report sets out the results of the statutory consultation on the proposals set out in paragraph 1.2 only as there was no statutory obligation to consult on the Parking Strategy. It seeks approval to proceed with the implementation of all those proposals, except for the withdrawal of daily visitor parking permits.

2. Cabinet Member Introduction

2.1. Not applicable

3. Recommendations

It is recommended that the Cabinet Member for Tackling Inequality and Resident Experience:

- 3.1 Notes the objections to the statutory consultation on proposed changes to parking policy and charges, as set out in Section 8 and Appendix A.
- 3.2 Approves the implementation of the changes set out in Appendix B to give effect to the proposals approved by Cabinet on 16 July 2024 set out in paragraph 1.2 above except for the withdrawal of daily visitor parking permits.
- 3.3 Agrees that the proposal to withdraw daily visitor parking permits shall not progress.
- 3.4 Delegates authority to the Head of Highways and Parking to make all necessary traffic management orders to implement the changes to parking policy and charges in Appendix B.

4. Reasons for decision

- 4.1. The Council is required to consider objections and representations received in response to statutory consultation on changes to parking policy and charges prior to making a decision on whether to proceed with the implementation of proposals.
- 4.2. The proposals support the delivery of the Council's adopted Parking Strategy. The overarching objective of that strategy is to create an efficient, reliable and safe road network - enhancing the safety and efficiency of Haringey's road network.
- 4.3. In line with the Council's overall charging policies, the new charges seek to address the environmental impact of vehicles, considering factors like volume of vehicles and vehicle emissions, and vehicle size. These charges are intended to incentivise more sustainable transport choices, aligning with the commitment to address the climate emergency and deliver healthy streets.

They also aim to reflect the real-world impact of vehicle usage and achieve a full cost recovery of service provision, ensuring financial stability of the service.

5. Alternative options considered

- 5.1. Consideration was given to relying on national and regional levers to influence car ownership and use. This would also result in the Council continuing to respond to pressures and stakeholder requirements on a responsive basis. However, in considering Haringey's transport ambitions and commitment to implement measures that improve the health and well-being opportunities for all borough residents, this option was not recommended for the following reasons:
 - Inadequate response to increasing demands continuing with existing practices would not adequately address the growing pressure on parking and highways as Haringey's population and infrastructure demands increase.
 - Compromise strategic objectives not adopting a strategic approach would undermine the ability to significantly contribute to corporate objectives, which aim to enhance mobility and support sustainable urban development.
 - Risk to service quality and efficiency the lack of a forward-looking strategy could lead to deteriorating service quality, increased congestion, and reduced satisfaction among residents and businesses.
- 5.2. Consideration was given to proceeding to implement proposals to withdraw daily visitor parking permits. Following consideration of the objections received, this is not being progressed further. Those objections highlighted the necessity of those permits, as well as that the withdrawal would have a disproportionate financial impact on some residents living in controlled parking zones (CPZs) with longer operational hours. Those tend to be in the east of the borough.

6. Background information

- 6.1. In July 2024¹, the Cabinet approved a new Parking Strategy, designed to foster a cohesive and forward-thinking approach to parking management. That strategy provides the parking management framework for a growing borough, seeking to alleviate congestion, support local businesses, improve air quality, and enhance the overall vitality of Haringey's diverse community.
- 6.2. At present, 264,000 people call Haringey home, and the population is expected to increase by 6.3% to 280,100 by 2031. As the local highway and parking authority, the Council manages and maintains 355km of streets and over 55,000 on-street parking bays and loading spaces that operate within 42 controlled parking zones (CPZs) that cover approximately 75% of the borough.
- 6.3. The strategy sets an approach for addressing key challenges, with the objectives:

¹ Parking Strategy & Policy / Charges Review, Cabinet July 2024

- Supporting a thriving, welcoming borough focusing on supporting accessibility to cultural, recreational, and commercial areas, and to boost local economy and community engagement.
- Delivering a responsive, effective service for Haringey's people commitment to proactive service delivery that anticipates and adapts to the needs of Haringey's people.
- Supporting residents with additional needs prioritising accessible parking solutions for residents with mobility restrictions or other specific needs to foster an inclusive community environment.
- Creating fairness in road space use strategically managing the allocation of road space to balance the needs of all users, promoting equitable access and minimising congestion, and improving the street environment.
- Delivering an innovative, sustainable parking service implementing advanced, sustainable technologies and practices that lead to more efficient use of resources and better service outcomes.
- 6.4. Alongside the Parking Strategy, in July 2024, Cabinet also authorised officers to proceed to carry out statutory consultation on amending relevant traffic management orders to implement changes to policies and charges. These proposals seek to address the environmental impact of vehicles (considering factors like volume of vehicles and vehicle emissions, and vehicle size), and to incentivise more sustainable transport choices aligning with the commitment to address the climate emergency and deliver healthy streets and to accurately reflect the real-world impact of vehicle usage.
- 6.5. When setting or reviewing parking charges, the Council considers:
 - Its transport and wider policy objectives
 - Statutory or legal requirements that may affect the setting of fees
 - Car ownership patterns
 - The increasing demand for parking
 - Traffic management issues
 - Market conditions for example, parking charges in other boroughs
 - The cost of delivering the service
 - Impact of charges on relevant stakeholders.
- 6.6. The Council has a duty under the Road Traffic Regulation Act 1984 section 122 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 having regard to securing and maintaining access to premises, preserving or improving the amenities of the areas, national air quality, facilitating the passage of public service vehicles and safety and convenience of people using such vehicles as far as practicable." Officers consider that the following are of particular relevance, given the overarching objective of the Parking Strategy:
 - Establishing charging principles promoting improved air quality through reduced emissions including a proposed electric vehicle charging tier,

charges based on vehicle size and incremental charges for additional vehicle permits for the same household.

- The provision of suitable and adequate parking facilities is advanced through business visitor permits.
- The introduction of pay and display charging for electric vehicles to encourage the turnover of parking spaces.
- 6.7. The measures that were proposed included the following (for which full details can be found in Appendix D of the July 2024 Cabinet report):

Updated permit charging structure, to include a new EV charging tier

- 6.8. The introduction of a new charging tier for fully electric vehicles (EVs) recognises that these vehicles do not contribute to local emissions this is in contrast to other vehicles in the current lowest charge tier (up to 100 CO₂ g/km). Circa 4% of current resident permit vehicles are fully electric, and to further encourage the usage of such vehicles, a distinct charge tier should be introduced.
- 6.9. It was proposed that a new lowest charging tier be established for pure electric vehicles, with other emissions band vehicles moved up 1 charging tier.

New permit vehicle size surcharging for a range of permits

- 6.10. The current charging structure focuses on the impact of emissions, however recognising the impact of the size of vehicles on the highway road space should also be considered. This reflects wider corporate objectives to reassess and reprioritise highway space and seeks to drive more efficient use of this space.
- 6.11. It was proposed that a vehicle size surcharge be introduced, with medium length vehicles (4m-4.49m) being charged the prevailing base charge plus 5% surcharge; and large length vehicles (4.5m+) being charged the prevailing base charge plus 10% surcharge.

Incremental subsequent permit surcharging for a range of permits

6.12. Current surcharges apply to resident permits only and consist of a flat charge for each additional permit per household. To further encourage reduced vehicle use, this principle should firstly be more consistently applied across the wider permit offer. Secondly, in line with several equivalent London boroughs, the surcharge structure should be amended to an incremental charge – such that each additional permit has an increased surcharge applied. It was proposed that, per permit type, an incremental surcharge for the 2nd, 3rd, 4th, 5th+ permits be applied per address / household.

Electric vehicle charging bays / parking in pay & display bays

6.13. Where short-term parking is currently offered without charge, this should be reviewed to introduce consistency in the parking offer. In order to manage parking demand and facilitate the turnover of parking spaces, it was proposed that electric vehicles parking in pay & display and EV charging bays – currently

not subject to charges – would be subject to charges in line with established short-term parking.

Change of address administration charge

6.14. This administrative process does not currently attract a charge. The proposal sought to ensure consistency for the service in applying an administration fee, at a prevailing charge (currently £15.00), in the case of a change of address (applies to charged-for permits).

Rejected permit applications administration charge

6.15. Residents parking permits are issued on trust – applicants confirm that they meet the eligibility criteria and provide the necessary supporting evidence. They are automatically provided with parking for one month while they supply this evidence. Some do not, hence applications being subsequently rejected. Therefore, as above, consistency was to be sought for an administrative process which does not currently attract an administrative charge. It was proposed to apply an administration fee for rejected applications at a prevailing charge for refund processing (currently £25.00).

Temporary cover (courtesy car)

6.16. It was proposed to offer this additional administrative permit service across the permit range where appropriate (temporary cover currently offered only on resident permits), at the prevailing charge (currently £40.00).

Business visitor permits

6.17. To offer additional options for local business parking, and to further consistency in the permit offer, it was proposed to introduce visitor permits for local businesses. Initially, this would be provided at a limit of 100 per annum per account, subject to review after a period of implementation. The prevailing short term (pay & display) charges would be applied.

New Blue Badge Holder Permit for those who work in the borough

6.18. To support the Corporate Delivery Plan theme concerning 'A Just Transition', it was proposed to extend the permit offer for disabled drivers to those who live outside the borough but commute to work. This mirrors the benefits of the current Resident Blue Badge Holder Permit – notably offering additional flexibility while reducing Blue Badge theft.

Daily visitor permits

6.19. Circumstantial evidence suggested that daily visitor permits were open to being used for purposes other than intended – typically by commuters using permits to park for the day, or by those residing in properties without entitlement to resident permits. The proposal was to discontinue the option for daily visitor permits for residents who retain hourly visitor permits as an option to provide parking for visitors (as consecutive hourly permits can be used for longer periods).

7. Statutory Consultation

- Page 14
- 7.1. The Council is legally required to undertake a statutory consultation and advertise the appropriate traffic management orders (TMOs) before implementing any changes to parking arrangements, including fees and charges. This requires the Council to advertise proposals in local newspapers and the London Gazette, providing a minimum 21-day period for objections or representations.
- 7.2. The statutory consultation on parking permits and charges commenced on 23 October 2024 and ran until 20 November 2024. Residents and other members of the public were informed of the consultation by the following methods:
 - Notices advertised in the local press and London Gazette
 - Emails sent out to some 43,675 permit holders
 - Dedicated webpage with key information, notification banners on other parking and transport webpages
 - Social media campaign: campaign of social media messages at the start of, and throughout, the consultation period.
 - Haringey People Extra: details published in 4 issues spanning October and November.
 - Haringey Business Bulletin: details published in the 1 November issue.
- 7.3. The Council consulted statutory bodies such as the police, ambulance, fire service, bus operators, the Road Haulage Association and the Freight Transport Association. Other stakeholders, such as cycling, environmental and disability groups, were also notified of proposals with feedback sought.

8. Consultation results

- 8.1. The Council received 3,439 responses to the consultation.
 - 3,318 of responses from residents, businesses and others either object to proposals or make various representations, of which 3,040 are unique responses
 - 95.6% (2,906) of unique responses object to the proposal to the withdrawal of daily visitor parking permits
- 8.2. Statutory consultees were notified of the proposed changes full responses can be found in Appendix A. In summary:
 - Four Haringey Councillors submitted objections to the consultation:
 - Four objections to the proposed discontinuation of daily visitor permits
 - One objection to the proposed incremental subsequent permit surcharging for a range of permits
 - Haringey Cycling Campaign submitted a response to the consultation, supporting the majority of proposed changes, however noting objection to the proposed discontinuation of daily visitor permits.

Updated permit charging structure, to include a new EV charging tier

8.3. The main objections and the Council responses are set out below:

- Concern about the impact of permit costs and/or the cost associated with the transition to an electric vehicle.
- Concern that EVs should not be given preference given they are larger / heavier
- 8.4. **Council response:** encouraging the transition to electric vehicles is a focus of a number of wider Council strategic objectives². This proposal supports this transition through having a distinct charge tier for fully electric vehicles with this tier being lower than charge tiers for internal combustion engine vehicles. Currently, there is no distinct charge tier for fully electric vehicles, so there is less incentive to transition to these vehicles. As set out in Appendix D of the July Cabinet³ report, a number of other London Boroughs operate a permit charging structure which distinguishes fully electric vehicles from internal combustion engine vehicles, and this proposal further brings Haringey in line with this approach.

New permit vehicle size surcharging for a range of permits

- 8.5. The main objections and the Council responses are set out below:
 - There are already other permit surcharges (e.g. emissions) or wider costs (e.g. insurance, tax) to running a larger vehicle.
 - The proposed size banding either should be adjusted to different thresholds or it added too much complexity.
 - The proposal penalises those who need a larger vehicle (e.g. families with children).
- 8.6. **Council response:** the Council recognises that there may be wider costs associated with a larger vehicle, and that some residents and parking users may require a larger vehicle for various reasons. There are, however, increasing demands for road and kerbside space, and the Council recognises in wider objectives⁴ the need to review, and reallocate, where appropriate, the use of kerbside and highway space. These competing demands place pressure on parking and the Council's responsibilities⁵ to provide suitable and adequate parking facilities. The proposal to recognise the impact of physically larger vehicles on the kerbside and highway space is a means to address these competing demands, by introducing a vehicle size surcharge within the parking permit charge structure.
- 8.7. Analysis was provided in the July 2024 Cabinet report appendices, which sets out the distribution of current permit vehicle sizes; the proposed size bands strike a balance between an approximately equal split of vehicles into 3 bands, with size thresholds which are easily recognisable (4 metres, 4.5 metres). The proposed surcharge is a relatively minor incremental cost (5%, 10%) for larger

² Parking Strategy 2024; Walking & Cycling Action Plan 2022; Climate Change Action Plan 2021; Transport Strategy 2018; Ultra low electric vehicle action plan 2019-2029;

³ Parking Strategy and Policy/Charges Review

⁴ Parking Strategy 2024; Walking & Cycling Action Plan 2022; Climate Change Action Plan 2021; Transport Strategy 2018

⁵ Road Traffic Regulation Act 1984 section 122

vehicles which impacts kerbside and highway space more than smaller vehicles.

Incremental subsequent permit surcharging for a range of permits

- 8.8. The main objections and the Council responses are set out below:
 - The proposal penalises those requiring multiple vehicles for example large families or multi-generational families residing in the same property.
- 8.9. **Council response:** currently, the Council allows individuals and households within CPZs to purchase as many parking permits as they require. A surcharge currently applies to resident permits only and consists of a flat charge for each additional permit per household. This was introduced in 2020⁶ to discourage multiple car ownership, achieve a less congested road network, and raise awareness of the environmental impact of multiple car ownership. There is no restriction on residents parking more than one vehicle.
- 8.10. For residents, the new proposal, therefore, only impacts households with more than 2 resident permits whereby these households would pay an incrementally higher surcharge for the 3rd permit onwards. It is considered that, given wider Council strategic objectives⁷ include encouraging reduced vehicle use, this proposal should be implemented to deliver on these objectives.
- 8.11. This objective is supported by applying the incremental subsequent permit surcharge more consistently across the wider permit offer (in addition to resident permits). As set out in Appendix D of the July 2024 Cabinet⁸ report, this is in line with a number of equivalent London Boroughs where incrementally increasing the surcharge for each additional permit is an established principle.

Electric vehicle charging bays/parking in pay & display bays

- 8.12. The main objections and the Council responses are set out below:
 - The proposal would have a negative impact on EV use / would increase the cost of EV use.
 - The proposal would penalise those who can't charge an EV at their home (typically those without a driveway)
- 8.13. **Council response:** the Council recognises concerns regarding the potential for the proposal to impact the uptake and usage of electric vehicles. However, the Council has a responsibility⁹ 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 having regard to securing and maintaining access to premises, preserving or improving the amenities of the areas, national air quality, facilitating the

⁶ Parking Permits and Charges – Ultra Low Emission Zone (ULEZ) Readiness

⁷ Transport Strategy 2018

⁸ Parking Strategy and Policy/Charges Review

⁹ Road Traffic Regulation Act 1984 section 122

passage of public service vehicles and safety and convenience of people using such vehicles as far as practicable." Ensuring measures are in place to encourage the turnover of parking, therefore, supports this responsibility. In addition, the Council will shortly be commencing a trial of electric vehicle footway charging channels. If successful, this would become a new service that residents would pay for and thereafter enable electric vehicles to be charged at their property (subject to access to the aforementioned channel).

Change of address

- 8.14. The main objections and the Council responses are set out below:
 - The permit charges should cover administration costs including change of address.
 - The proposed charge was unreasonable
 - The proposed charge would disincentivise permit holders to notify the Council of a change of address.
- 8.15. **Council response:** there is an established principle for a fee to apply for wider administration services relating to permits (changes, cancellations and refunds) and this proposal makes clear that this administration fee was previously not applied to change of address but would be introduced going forward. The charge proposed reflects the requirement on the part of the Council to review proof of address (eligibility to park in the new location) and administer changes to all impacted permits and is in line with other administration charges in place.
- 8.16. The Council considered the disincentive potential of the proposal is limited, given that the majority of, for example, home moves will require the permit location validity to be updated (e.g. a CPZ change) and without this update, the resident will not have permission to park in the new location with the associated risk of parking enforcement and the issuance of penalty charge notices.

Rejected permit applications

- 8.17. The main objections and the Council responses are set out below:
 - The proposal would penalise those who misunderstand the application process, the eligibility criteria or the evidence required.
 - The permit charges should cover admin costs including offsetting costs for rejecting permit applications.
- 8.18. **Council response:** The Council understands that there may be concerns regarding the introduction of the measure to apply an administration charge when rejecting ineligible permit applications. This concern should, however, be viewed in the context of the available information regarding eligibility and evidence required which is made available on the Council's website and when progressing through the application process. There is also the option to contact Customer Services within the online permit account to raise queries before the application. The applicant is given a further opportunity post-application to provide the required evidence.

- 8.19. The Council currently offers the benefit of in the case of resident permit applications permission to park while a permit application is pending, ensuring that residents are not inconvenienced while awaiting the issue of a permit. The Council wishes to ensure that the benefit of the offer of permission to park with a pending application is not being abused and this measure is required to address the potential for repeated spurious or vexatious permit applications which have no eligibility basis.
- 8.20. Finally, there is an established principle for a fee to apply for wider administration services relating to permits (changes, cancellations and refunds) and this proposal extends this principle to a further administration service.

Temporary cover (courtesy car)

- 8.21. The main objections and the Council responses are set out below:
 - The proposed period of cover was insufficient, or that the service should not be extended to other permits
- 8.22. **Council response:** temporary cover is a service currently only made available for resident permits, providing an option to temporarily change the vehicle on an existing permit for a charge. The proposal to extend this to other permit types means a wider range of permit holders can take advantage of this service. The period of temporary cover currently available for resident permits is 21 days we are not aware of significant feedback that this period should be amended.

Business visitor permits

- 8.23. The main objection and the Council responses are set out below:
 - The proposal would have a negative effect on the availability of resident parking in their area.
- 8.24. **Council response:** it is considered that the proposal to offer visitor permits to businesses provides additional flexible parking options for local businesses, who may not otherwise be able to park close to their premises. This supports the wider Council strategic objectives¹⁰ to support and promote the local economy. Establishing an annual limit of 100 hourly permits in practice means that each business has less than 2 hours of parking per week for their CPZ. Additionally, the impact of the proposal is to be monitored and reviewed after a period of implementation, at which time the proposed limit may be amended. Given the limited availability, it is considered that any negative impact on resident parking will be minimal, and should any significant impact be identified, the proposed review process will address this.

New Blue Badge Holder Permit for those who work in the borough

8.25. The main objections and the Council responses are set out below:

¹⁰ Corporate Delivery Plan 2023/24

- The proposed scheme may be open to abuse (used for parking other than for work purposes), or that sufficient parking was already available.
- 8.26. **Council response:** a review of responses shows that while a very small number of responses raised specific concerns in the vast majority of cases where objections have been made that concern this proposal, these form part of a response which states an objection to all proposals (see paragraph 8.1 above) without providing specific reasons for objection. The scheme proposed parallels that are currently available for Haringey residents who are Blue Badge holders: these residents may get a free 'Resident Blue Badge Holder' Permit which allows parking permission similar to that available with a Blue Badge, but without the need to display the badge. This reduces the potential for Blue Badge theft and fraud. The current scheme is popular with over 3000 residents holding such a permit, and there is no known issue with abuse of the scheme. The proposal extends this convenience and reduces the risk of theft to other Blue Badge holders.

Daily visitor permits

- 8.27. The main objections and the Council responses are set out below:
 - The proposal would negatively impact residents' ability to have visitors for example family / friends, those providing support or care, or trades conducting property maintenance.
 - The administrative and financial burden of the proposal. The potential cost increases were cited as significant and would impact the respondents' ongoing family life. Respondents were concerned that there was a greater administrative requirement to manage hourly visitor permits, for example, needing to add new permits should a visitor stay longer than anticipated.
 - The proposal seeks to address potentially fraudulent use of daily visitor permits, but such activities should be addressed through other, more targeted means.
 - There would be a disproportionate impact of the proposal across the borough, with CPZ enforcement hours varying from the west (typically shorter hours) to the east (typically longer hours). The proposal therefore has the potential for a differential impact across these CPZs.
- 8.28. **Council response:** The Council recognises the significant number of responses received concerning this proposal, as well as the nature and content of those responses which set out the potential impact of the proposed change to visitor permits. Through reviewing the consultation responses, the Council has an improved understanding of this potential impact, and how it may change the daily lives of residents across the borough.
- 8.29. Significant numbers of responses provide detailed information regarding the nature of the potential impact on daily family life and interactions with family and friends, in terms of cost and practicality, and the greater significance of the proposal in different CPZs.

8.30. It is considered, therefore, that, given the nature and extent of the objections received, it would not be of benefit to the wider Haringey community to proceed with this proposal. Potential gains in addressing the current usage of the daily visitor permit are outweighed by the likely negative impacts of the proposal. Therefore other measures will be considered to address inappropriate usage of daily visitor permits.

Comments on consultation process / evidence

- 8.31. Comments on the policy development or consultation process concerned:
 - Policy development:
 - Concern about policy development and the engagement process which formed part of this
 - Concern that documentation did not sufficiently evidence issues noted / capture the equalities impact of proposed policies
 - Consultation:
 - Concerns that the statutory consultation was not properly / sufficiently well communicated or advertised
 - Concern that the consultation required response in the form of written / email submission
 - Concern that the period of consultation was amended
- 8.32. **Council response:** The proposed parking policy/charge changes form part of the Parking Strategy delivery plan. The strategy and plan were developed from a range of data sources, analysis and review of a range of updated policy options which support the strategic objectives. As part of this wider data gathering and policy development process, an engagement exercise took place in early 2024, seeking feedback across a wide range of parking policy matters. Further engagement took place with elected representatives. This engagement contributed to the development of proposed policy changes, alongside review of other data and service delivery feedback with statutory consultation following, rather than preceding the proposals submitted to the Cabinet in July 2024.
- 8.33. This wider service delivery feedback also considers a range of permit service investigations undertaken at various stages and over a period of time, with varying outcomes information which may be held across various sections of the Council and in various formats documented in a manner which may not be suitable for publication. Similarly, as noted in the initial equalities impact assessment, protected characteristics data is not held on parking permit users and therefore assessment by those characteristics is problematic without relying on inference or assumption.
- 8.34. Statutory consultation undertaken follows the established process regarding proposed highways and parking changes. In this case, the process for communicating and advertising the consultation was significantly beyond the statutory requirement for such consultations. As outlined in paragraph 7.2 above, in addition to the statutory requirement for advertisement in local newspapers, the Council made direct communication with permit holders, advertised in Haringey publications, established dedicated webpages, and ran

a campaign of social media messaging throughout the period of consultation. The form of submission of responses in writing is also standard process and follows statutory requirements.

8.35. A decision was made in the initial days of the statutory consultation period to republish the notice due to a minor amendment required to the TMO clarifying details regarding a limit on visitor permits (the notice itself was not amended). Subsequently, the consultation end date was amended to 21 days following the republishing of the notice.

9. Contribution to the Corporate Delivery Plan 2022-2024 High level Strategic outcomes

- 9.1. Strategy and policy measures proposed in this report support various themes of the Corporate Delivery Plan. The various proposals will contribute to:
 - Arts, culture and heritage are fostered, celebrated and valued, and are woven through everything the council does: parking strategy recognises and supports a growing, thriving borough, and ensures residents and local businesses benefit from this growth.
 - A Just Transition The transition to a low carbon economy is just, equitable and benefits everyone: strategic objectives to ensure Haringey residents continue to benefit from local economic and cultural developments, in addition to maintaining core parking standards for local residents and businesses.
 - A Safer Borough: strategic objectives support safe efficient and reliable operation of the transport network and parking infrastructure.
 - A Greener and Climate Resilient Haringey: Improving measures to address the impact of vehicles and parking, across various policy components, are intended to result in reduced emissions, and impacts of vehicles.

10. Carbon and Climate Change

- 10.1. Parking management contributes positively to carbon emission reduction and mitigates climate change:
 - Reduced vehicle emissions managed parking reduces congestion. Parking controls will help ease congestion, leading to a decrease in emissions and therefore decrease in carbon footprint.
 - Managed parking can improve accessibility for those walking and wheeling, encouraging more walking. This not only reduces greenhouse gas emissions but also promotes a healthier lifestyle, which, in the long run, can reduce healthcare-related conditions linked to sedentary lifestyles.
 - Modal change: Managed parking arrangements can also support modal change. When motorised access is restricted, motorists may choose alternative transportation modes, reducing the number of vehicles on the road and associated emissions. Over time, this can lead to a shift in commuting habits with lasting environmental benefits.

11. Statutory Officers' comments (Director of Finance (procurement), Head of Legal and Governance, Equalities)

Finance

- 11.1 The report seeks approval for the new charging policy to address the environmental impact of vehicles, align with the commitment to address the climate emergency and deliver healthy streets.
- 11.2 Any expenditure incurred in implementing the new charging policy will be financed through the existing service budgets.

Strategic Procurement

- 11.3. Strategic Procurement was consulted in the preparation of this report.
- 11.4 Strategic Procurement notes the recommendations in section 3 of the report and that there are no procurement issues associated with this decision.
- 11.5 Strategic Procurement has no objections to the recommendations in section 3 of the report.

Assistant Director Legal & Governance

- 11.6. The Council has power under the Road Traffic Regulation Act 1984 (RTRA) to vary charges for parking places including charges for the issue or use of permits.
- 11.7. The Council must not set charges for vehicles left in parking places for the purpose of raising revenue. The setting of charges that results in a surplus will not in itself be unlawful provided such surplus is used for the purposes specified in section 55 of the RTRA which includes the cost of provision and maintenance of off-street parking accommodation.
- 11.8. In determining the amount of any charges payable for vehicles left in designated parking places, the Council shall consider both the interests of traffic and those of the owners and occupiers of adjoining property, and in particular the Council shall have regard to the:
 - a) need for maintaining the free movement of traffic;
 - b) need for maintaining reasonable access to the premises; and
 - c) extent to which off-street parking is available in the neighbourhood.
- 11.9. As required, under the Local Authorities' Traffic Orders (Procedure)(England and Wales Regulations 1996, the variations to the charges have been consulted on as set out in section 7 of the report, and as required under section 122 of the RTRA, the factors which point in favour of making the changes to charges are set out in paragraph 6.6 of this report.
- 11.10. The consultation responses received are sent out in Appendix A to this report and officers' consideration of the same set out in section 8 of this report which must be taken into account before the decision whether to vary or not the charges as set out in Appendix B attached to this report is taken. A judgment is to be exercised as to how much weight each representation should carry and

whether or not to approve the proposed variations to the charge in light of those representations.

- 11.11. The Courts have held that a decision maker must consider consultation responses with 'a receptive mind' and be prepared to change course if persuaded by a response but is not under a duty to adopt the views of consultees.
- 11.12. The variation of charges under the RTRA an executive decision that can be exercised by the Cabinet Member for Resident Services & Tackling Inequality in accordance with the Council's Constitution and the delegation given by the Leader of the Council to the Cabinet Member in the Forward Plan published on 7 January 2025.

Equality

- 11.13. The Council has a Public Sector Equality Duty (PSED) under the Equality Act (2010) to have due regard to the need to:
 - Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
 - Advance equality of opportunity between people who share protected characteristics and people who do not
 - Foster good relations between people who share those characteristics and people who do not.
- 11.14. The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.
- 11.15. Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic
- 11.16. The EqIA can be found in Appendix C; proposals contained within this report are in the whole of neutral impact on a majority of individuals with protected characteristics in the borough. Policy and charging proposals, are boroughwide measures and do not target particular groups – except as noted below.
- 11.17. Where potential impacts can be identified, these are potentially positive in nature: firstly, for those with disability and/or additional mobility needs, where additional measures are proposed to improve parking and permit provision; and secondly, for children and older people or pregnant women who may be more impacted by air pollution, proposals further extend existing policy and charging principles which seek to reduce the impact of car emissions.
- 11.18. Policy and charging proposals concern all controlled parking zone areas across the borough. Given this, there is typically no target population profile distinct from the borough profile. Furthermore, data is not held on parking users / parking permit holders' protected characteristics, therefore detailed impact analysis by for these profiles is not possible. Where positive impacts have been noted, it is due to a target profile which can be identified as distinct from the general borough profile: this may be those who are holders of Blue Badges (therefore a profile group which has a disability), groups more impacted by air

pollution (children & older people, pregnant and maternity profiles, and areas of social deprivation), and groups self-identifying as being of a particular community or religious group. Where data on these groups exists – for the specific purposes of impacts of changes to parking strategy, policy and charging – it is provided in the EqIA.

12. Use of Appendices

Appendix A – Statutory consultation report Appendix B – Proposed parking permits and associated fees Appendix C – Equality Impact Assessment

13. Background papers

Parking Strategy and Policy/Charges Review – Cabinet 16th July 2024

Appendix A: Statutory Consultation Report

1. Introduction

- 1.1. The statutory consultation on parking permits and charges commenced on 23 October 2024 and ran until 20 November 2024. Residents and other members of the public were informed of the consultation by the following methods:
 - Notices advertised in the local press and London Gazette
 - Emails sent out to some 43,675 permit holders
 - Dedicated webpage with key information, notification banners on other parking & transport webpages
 - Social media campaign: campaign of social media messages at the start of, and throughout, the consultation period.
 - Haringey People Extra: details published in 4 issues spanning October and November.
 - Haringey Business Bulletin: details published in the 1 November issue.
- 1.2. The Council consulted statutory bodies such as the police, ambulance, fire service, bus operators, the Road Haulage Association and the Freight Transport Association. Other stakeholders, such as cycling, environmental and disability groups were also notified of proposals with feedback sought.
- 1.3. The Council received 3,439 responses to the consultation.
 - 3,318 of responses from residents, businesses and others either objecting to proposals or making various representations, of which 3,040 are unique responses
 - 95.6% (2906) of unique responses objected to the proposal to withdrawal of daily visitor parking permits
- 1.4. Statutory consultees were notified of the proposed changes full responses can be found in section 5. In summary:
 - Four Haringey Councillors submitted objections to the consultation:
 - Four objections to the proposed discontinuation of daily visitor permits
 - One objection to the proposed incremental subsequent permit surcharging for a range of permits
 - Haringey Cycling Campaign submitted a response to the consultation, supporting the majority of proposed changes, however noting objection to the proposed discontinuation of daily visitor permits.

2. **Proposed measures:**

2.1. The measures being proposed and presented for statutory consultation are summarised below:

- The introduction of a new parking permit charge band for fully electric vehicles, with a resulting change to all other parking permit charge bands.
- A new parking permit surcharge for larger vehicles 5% for medium length vehicles and 10% for longer length vehicles.
- Surcharges applying to second and subsequent parking permits to become incrementally higher depending on number of vehicles per household. This surcharge to extend to business parking permits.
- The introduction of parking charges for electric vehicles (EVs) using paybyphone and contactless parking bays and when parking in EV charging bays.
- Administration fees to apply to rejected permit applications and to change of address applications. The introduction of a 21-day temporary vehicle cover (£40) for business, boroughwide and utility, essential service and doctor permits. This already applies to residential parking permits.
- The introduction of hourly business visitor parking permits limited to 100 per annum.
- The introduction of a Non-Resident Blue Badge Holder Permit for those who work in the borough.
- The withdrawal of daily visitor parking permits.

3. Detailed objections and the Council's responses

N.B. reasons given for objection may sum to >100%, as respondents may give more than one reason for objection.

Updated permit charging structure, to include a new EV charging tier

- 3.1. 250 responses, 8.2% of the total unique responses, objected to the proposal to introduce a new charge structure to include a new EV charging tier.
 - 83.6% (209) of those objecting did not provide a reason (typically this covers respondents objecting to all proposals).
 - 12.0% (30) of those objecting were concerned about the impact permit costs and/or the cost associated with transition to an electric vehicle.
 - 4.4% (11) of those objecting suggested EVs should not be given preference given they are larger / heavier
- 3.2. **Council response:** encouraging the transition to electric vehicles is a focus of a number of wider Council strategic objectives¹. This proposal supports this transition through having a distinct charge tier for fully electric vehicles with this tier being lower than charge tiers for internal combustion engine vehicles. Currently, because there is no distinct charge tier for fully electric vehicles,

¹ <u>Parking Strategy 2024;</u> <u>Walking & Cycling Action Plan 2022;</u> <u>Climate Change Action Plan 2021;</u> <u>Transport Strategy 2018;</u> <u>Ultra low electric vehicle action plan 2019-2029;</u>

there is less incentive to transition to these vehicles. As set out in Appendix D of the July Cabinet² report, a number of other London Boroughs operate a permit charging structure which distinguishes fully electric vehicles from internal combustion engine vehicles, and this proposal further brings Haringey in line with this approach.

New permit vehicle size surcharging for a range of permits

- 3.3. 458 responses, 15.1% of the total unique responses, objected to the proposal to introduce a new surcharge linked to vehicle size.
 - 50.4% (231) of those objecting did not provide a reason (typically this covers respondents objecting to all proposals).
 - 11.4% (52) of those objecting considered that there are already other permit surcharges (e.g. emissions) or wider costs (e.g. insurance, tax) to running a larger vehicle.
 - 13.9% (64) of those objecting considered that the proposed size banding either should be adjusted to different thresholds, or added too much complexity
 - 27.5% (126) of those objecting considered that the proposal penalises those who need a larger vehicle (e.g. families with children)
- 3.4. **Council response:** the Council recognises that there may be wider costs associated with a larger vehicle, and that some residents and parking users may require a larger vehicle for various reasons. There are however increasing demands for road and kerbside space, and the Council recognises in wider objectives³ the need to review, and reallocate where appropriate, the use of kerbside and highway space. These competing demands place pressure on parking and the Council's responsibilities⁴ to provide suitable and adequate parking facilities. The proposal to recognise the impact of physically larger vehicles on the kerbside and highway space is a means to address these competing demands, through introducing a vehicle size surcharge within the parking permit charge structure.
- 3.5. Analysis was provided in the July 2024 Cabinet report appendices which sets out the distribution of current permit vehicle sizes; the proposed size bands strike a balance between an approximately equal split of vehicles into 3 bands, with size thresholds which are easily recognisable (4 meters, 4.5 metres). The proposed surcharge is a relatively minor incremental cost (5%, 10%) for larger vehicles which impact kerbside and highway space more than smaller vehicles.

Incremental subsequent permit surcharging for a range of permits

² Parking Strategy and Policy/Charges Review

³ Parking Strategy 2024; Walking & Cycling Action Plan 2022; Climate Change Action Plan 2021; Transport Strategy 2018

⁴ Road Traffic Regulation Act 1984 section 122

- 3.6. 356 responses, 11.7% of the total unique responses, objected to the proposal to introduce an extended subsequent permit surcharge for a range of permits.
 - 72.5% (258) of those objecting did not provide a reason (typically this covers respondents objecting to all proposals).
 - 27.5% (98) of those objecting were concerned that the proposal penalises those requiring multiple vehicles for example large families or multi-generational families residing in the same property.
- 3.7. **Council response:** currently, the Council allows individuals and households within CPZs to purchase as many parking permits as they require. A surcharge currently applies to resident permits only and consists of a flat charge for each additional permit per household. This was introduced in 2020⁵ to discourage multiple car ownership, achieve a less congested road network, and raise awareness of the environmental impact of multiple car ownership. There is no restriction on residents parking more than one vehicle.
- 3.8. For residents, the new proposal therefore only impacts households with more than 2 resident permits whereby these households would pay an incrementally higher surcharge for the 3rd permit onwards. It is considered that, given wider Council strategic objectives⁶ include encouraging reduced vehicle use, this proposal should be implemented to deliver on these objectives.
- 3.9. This objective is supported by applying the incremental subsequent permit surcharge more consistently across the wider permit offer (in addition to resident permits). As set out in Appendix D of the July Cabinet⁷ report, this is in line with a number of equivalent London boroughs where incrementally increasing the surcharge for each additional permit is an established principle.

Electric vehicle charging bays / parking in pay & display bays

- 3.10. 413 responses, 13.6% of the total unique responses, objected to the proposal to introduce an administration charge for change of address.
 - 53.5% (221) of those objecting did not provide a reason (typically this covers respondents objecting to all proposals)
 - 43.0% (178) of those objecting considered the proposal would have negative impact on EV use / would increase the cost of EV use.
 - 17.3% (72) of those objecting considered the proposal would penalise those who can't charge an EV at their home (typically those without a driveway)
- 3.11. **Council response:** the Council recognises concerns regarding the potential for the proposal to impact the uptake and usage of electric vehicles. However the Council has a responsibility⁸ to "secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the

⁵ Parking Permits and Charges – Ultra Low Emission Zone (ULEZ) Readiness

⁶ Transport Strategy 2018

⁷ Parking Strategy and Policy/Charges Review

⁸ Road Traffic Regulation Act 1984 section 122

provision of suitable and adequate parking facilities on and off the highway having regard to securing and maintaining access to premises, preserving or improving the amenities of the areas, national air quality, facilitating the passage of public service vehicles and safety and convenience of people using such vehicles as far as practicable." Ensuring measures are in place to encourage the turnover of parking therefore supports this responsibility. In addition, the Council will shortly be commencing a trial of electric vehicle footway charging channels. If successful, this would become a new service that residents would pay for and thereafter enable electric vehicles to be charged at their property (subject to access to the aforementioned channel).

Change of address

- 3.12. 410 responses, 13.5% of the total unique responses, objected to the proposal to introduce an administration charge for change of address.
 - 67.0% (275) of those objecting did not provide a reason (typically this covers respondents objecting to all proposals)
 - 27.0% (111) of those objecting considered that the permit charges should cover admin costs including change of address.
 - 7.3% (30) of those objecting considered the proposed charge was unreasonable
 - 1.0% (4) of those objecting considered that the proposed charge would disincentivise permit holders to notify the Council of a change of address.
- 3.13. **Council response:** there is an established principle for a fee to apply for wider administration services relating to permits (changes, cancellations and refunds) and this proposal makes clear that this administration fee previously not applied to change of address will be introduced going forward. The charge proposed reflects the requirement on the part of the Council to review proof of address (eligibility to park in the new location) and administer changes to all impacted permits and is in line with other administration charges in place.
- 3.14. The Council considered the disincentive potential of the proposal is limited, given that the majority of, for example, home moves will require the permit location validity to be updated (e.g. a CPZ change) and without this update the resident will not have permission to park in the new location with the associated risk of parking enforcement and the issuance of penalty charge notices.

Rejected permit applications

- 3.15. 418 number of responses, 13.8% of the total unique responses, objected to the proposal to introduce an administration charge for rejected permit applications.
 - 62.0% (259) of those objecting did not provide a reason (typically this covers respondents objecting to all proposals)

- 25.6% (107) of those objecting were concerned that the proposal would penalise those who misunderstand the application process, the eligibility criteria or evidence required.
- 12.9% (54) of those objecting considered that the permit charges should cover admin costs including offsetting costs for rejecting permit applications.
- 3.16. **Council response:** the Council understands that there may be concern regarding the introduction of the measure to apply an administration charge when rejecting ineligible permit applications. This concern should, however, be viewed in the context of the available information regarding eligibility and evidence required which is made available on the Council website and when progressing through the application process. There is also the option to contact Customer Services within the online permit account to raise queries pre-application. The applicant is given a further opportunity post-application to provide the required evidence.
- 3.17. The Council currently offers the benefit of in the case of resident permit applications permission to park while a permit application is pending, ensuring that residents are not inconvenienced while awaiting the issue of a permit. The Council wishes to ensure that the benefit of the offer of permission to park with a pending application is not being abused and this measure is required to address the potential for repeated spurious or vexatious permit applications which have no eligibility basis.
- 3.18. Finally, there is an established principle for a fee to apply for wider administration services relating to permits (changes, cancellations and refunds) and this proposal extends this principle to a further administration service.

Temporary cover (courtesy car)

- 3.19. 203 responses, 6.7% of the total unique responses, objected to the proposal to extend the temporary cover (courtesy car) option to a wider range of permits.
 - 97.0% (197) of those objecting did not provide a reason (typically this covers respondents objecting to all proposals)
 - 3.0% (6) of those objecting were concerned that the proposed period of cover was insufficient, that the service is too expensive or should not be extended to other permits
- 3.20. **Council response:** temporary cover is a service currently only made available for resident permits, providing an option to temporarily change the vehicle on an existing permit for a charge. The proposal to extend this to other permit types means a wider range of permit holders can take advantage of this service. The period of temporary cover currently available for resident permits is 21 days we are not aware of significant feedback that this period should be amended.

Business visitor permits

- 3.21. 235 responses, 7.7% of the total unique responses, objected to the proposal to introduce business visitor permits for local businesses, initially at a limit of 100 per annum per account (subject to review after a period of implementation).
 - 86.8% (204) of those objecting did not provide a reason (typically this covers respondents objecting to all proposals).
 - 14.3% (34) of those objecting were concerned that the proposal would have a negative effect on the availability of resident parking in their area.
- 3.22. **Council response:** it is considered that the proposal to offer visitor permits to businesses provides additional flexible parking options for local businesses, who may not otherwise be able to park close to their premises. This supports the wider Council strategic objectives⁹ to support and promote the local economy. Establishing an annual limit of 100 hourly permits in practice means that each business has less than 2 hours of parking per week for their CPZ. Additionally, the impact of the proposal is to be monitored and reviewed after a period of implementation, at which time the proposed limit may be amended. Given the limited availability it is considered that any negative impact on resident parking will be minimal, and should any significant impact be identified, the proposed review process will address this.

New Non-Resident Blue Badge Holder Permit for those who work in the borough

- 3.23. 190 responses, 6.3% of the total unique responses, objected to the proposal to introduce a new Non-Resident Blue Badge Holder Permit for those that work in the borough.
 - 97.9% (186) of those objecting did not provide a reason (typically this covers respondents objecting to all proposals).
 - 2.1% (4) of those objecting were concerned that the proposed scheme may be open to abuse (used for parking other than for work purposes), or that sufficient parking was alread0y available.
- 3.24. **Council response:** a review of responses shows that while a very small number of responses raise specific concerns in the vast majority of cases where objections have been made which concern this proposal, these form part of a response which states an objection to all proposals (see paragraph 1.3 above) without providing specific reasons for objection. The scheme proposed parallels that currently available for Haringey residents who are Blue Badge holders: these residents may get a free 'Resident Blue Badge Holder Permit' which allows parking permission similar to that available with a Blue Badge, but without the need to display the badge. This reduces the potential for Blue Badge theft and fraud. The current scheme is popular with over 3000 residents holding such a permit, and there is no known issue with abuse of the scheme. The proposal extends this convenience and reduced risk of theft to other Blue Badge holders.

⁹ Corporate Delivery Plan 2023/24

Daily visitor permits

- 3.25. 2906 responses, 95.6% of the total unique responses, objected to the proposal to withdraw the daily visitor permit.
 - 12.0% (349) of those objecting did not provide a reason (typically this covers respondents objecting to all proposals).
 - 67.9% (1973) of those objecting were concerned that the proposal would negatively impact their ability to have visitors – for example family / friends, those providing support or care, or trades conducting property maintenance.
 - 70.1% (2036) of those objecting were concerned about the administrative and financial burden of the proposal. The potential cost increases were cited as significant and would impact the respondents' ongoing family life. Respondents were concerned that there was a greater administrative requirement to manage hourly visitor permits, for example needing to add new permits should a visitor stay longer than anticipated.
 - 24.7% (719) of those objecting suggested that if the proposal seeks to address potentially fraudulent use of daily visitor permits, such activities should be addressed through other, more targeted means.
 - 33.3% (966) of those objecting were concerned about the disproportionate impact of the proposal across the borough, with CPZ enforcement hours varying from west (typically shorter hours) to east (typically longer hours). The proposal therefore has the potential for a differential impact across these CPZs.
- 3.26. **Council response:** the Council recognises the significant number of responses received concerning this proposal, as well as the nature and content of those responses which set out the potential impact of the proposed change to visitor permits. Through reviewing the consultation responses, the Council has an improved understanding of this potential impact, and how it may change the daily lives of residents across the borough.
- 3.27. Significant numbers of responses provide detailed information regarding the nature of the potential impact on daily family life and interactions with family and friends, in terms of cost and practicality, and the greater significance of the proposal in different CPZs.
- 3.28. It is considered therefore that, given the nature and extent of the objections received, it would not be of benefit to the wider Haringey community to proceed with this proposal. Potential gains in addressing the current usage of the daily visitor permit are outweighed by the likely negative impacts of the proposal, and therefore other measures will be considered to address inappropriate usage of daily visitor permits.

Comments on consultation process / evidence

- 3.29. 280 responses, 9.2% of the total unique responses, commented on the policy development or consultation process.
 - Consultation:
 - Concerns that the consultation was not properly / sufficiently well communicated or advertised
 - Concern that the consultation required response in the form of written / email submission
 - Concern that the period of consultation was amended
 - Policy development:
 - Concern about policy development and the engagement process which formed part of this
 - Concern that documentation did not sufficiently evidence issues noted / capture the equalities impact of proposed policies
- 3.30. **Council response:** the consultation undertaken follows the established process for statutory consultations regarding proposed highways and parking changes. In this case the process for communicating and advertising the consultation was significantly beyond the statutory requirement for such consultations. As outlined in paragraph 1.1 above, in addition to the statutory requirement for advertisement in local newspapers, the Council made direct communication with permit holders, advertised in Haringey publications, established dedicated webpages, and ran a campaign of social media messaging throughout the period of consultation. The form of submission of responses in writing is also standard process and follows statutory requirements.
- 3.31. A decision was made in the initial days of the statutory consultation period to republish the notice due to a minor amendment required to the TMO clarifying details regarding a limit on visitor permits (the notice itself was not amended). Subsequently, the consultation end date was amended to 21 days following the republishing of the notice.
- 3.32. The proposed parking policy/charge changes form part of the Parking Strategy delivery plan. The strategy and plan were developed from a range of data sources, analysis and review of a range of updated policy options which support the strategic objectives. As part of this wider data gathering and policy development process, an engagement exercise took place in early 2024, seeking feedback across a wide range of parking policy matters. Further engagement took place with elected representatives. This engagement contributed to the development of proposed policy changes, alongside review of other data and service delivery feedback with statutory consultation following, rather than preceding the proposals submitted to the Cabinet in July 2024.
- 3.33. This wider service delivery feedback also considers a range of permit service investigations undertaken at various stages and over a period of time, with varying outcomes information which may be held across various sections of the council and in various formats documented in a manner which may not be suitable for publication. Similarly, as noted in the initial equalities impact

assessment, protected characteristics data is not held on parking permit users – and therefore assessment by those characteristics is problematic without relying on inference or assumption.

4. Examples of comments submitted in support of the proposed measures

4.1. Example supportive comments on proposed measures

Reason for support / comment

I think charging more for permits for bigger vehicles seems fair.

I'm in favour for the proposal to introduce a parking permit surcharge that reflects the size of a vehicle.

By the way I really support the production of vehicle size surcharging, and as a disabled driver, the workplace Virtual blue badge permit. Great ideas!

I support many of the proposals in this plan, including additional BEV charging bays and surcharging by vehicle size

From an environmental perspective, this is a very good proposal. These vehicles take up more space, consume more fuel and are more polluting, so every effort should be made to discourage their use.

This seems fair and proportionate as a concept, provided the rate of the charges set is reasonable.

Very enthusiastic about vehicle size surcharging. Larger vehicles should definitely be charged more for parking.

I mostly agree with the proposals included in the new parking strategy. I believe they are fair--especially when dealing with subsequent parking permits and the size of vehicles.

I strongly support moves that get the pricing of road space closer to a market rate, including increases as proposed.

I agree with a permit surcharge that reflects size of the vehicle. In the parking zone CEA, for example, many large vans, camper vans, caravans are often parked to the detriment of residents whether trying to park in their own areas of parking to use the local Crouch End shops. Larger vehicles cause problems with congestion and to road surfaces.

I am in support of the principle of this proposal. My concern would be that the surcharges are very low and certainly not of a level that would influence buying decisions and steer drivers towards smaller cars. I would like to see higher surcharges being imposed based on vehicle size/weight.

we agree that there should be additional charges for larger vehicles but we think they should increase much more steeply with size, by 25% and 50% not 5%.

I support the introduction of business visitor permits. This would be a helpful option for local businesses, allowing short-stay parking for their visitors, which mirrors successful systems already in place in other London boroughs. The

Reason for support / comment

annual limit of 100 per account seems reasonable and can always be reviewed if demand dictates a change.

I support to introduce business visitor permits to offer additional short stay options for local business parking.

Workplace virtual Blue Badge and Business visitor permits. As a disabled person with a Blue badge, I would welcome this change, as it would assist a disabled person and promote local businesses and community.

Business Visitor Permits are a great idea, if kept to a decent price. I work for a small business in N17 and we always struggle to have our visitors park locally.

The Workplace Virtual Blue Badge Permit is an extremely good idea, so I fully support that change.

I support the introduction of a Workplace Virtual Blue Badge Permit for Blue Badge holders who work in the borough but live outside it. This measure not only addresses security concerns by preventing theft of physical Blue Badges but also provides disabled workers with an accessible and practical parking solution near their workplace.

Blue badge permit esp for those licing outside haringey is great same as business permits

Introducing a new Workplace Virtual Blue Badge Permit - Support: This seems like a hugely positive step to help support those with recognised mobility difficulties.

I support introducing a new Workplace Virtual Blue Badge Permit, as this will prevent the theft of Blue Badges. Similarly, I think all blue badges should be virtual and registered onto vehicle number plates virtually, as this will not only prevent theft across the borough or outside one's property but also ensure their intended use. If this were the case, the Blue Badge holders would only need to display the parking time.

One proposal I do support is for Introducing a new Workplace Virtual Blue Badge Permit. This is a positive step in encouraging a diverse work force and supporting people with disabilities to be part of the work force and the positive impacts of this.

I agree with the proposal to introduce charges for short-term parking in electric vehicle charging bays. This change would encourage turnover and ensure that the limited number of charging bays are available to more users, supporting broader access to EV charging infrastructure.

Proposal: to introduce charges for Electric Vehicle (EVs) short-term parking and electric charging bays. – I think this is a good idea to increase the usage of the electric charging points. Currently please park there all day as if it is a private space.

I support the introduction of innovative charging for EV spaces to encourage access to these spaces.

Reason for support / comment

I agree with the proposed surcharge structure for subsequent permits within households. This would discourage excessive vehicle ownership, which contributes to congestion and pollution, while promoting a more balanced use of parking spaces across the borough.

I support additional charges for second and subsequent residents permits per household. However, I think the increments are too lenient. The hike should be significantly higher, possible the second permit double the cost of first, triple for the third. It is unfair to other residents when one household dominates the kerbside, preventing neighbours from parking near their homes.

Again, I am in support of the principle of this proposal but believe that the surcharge, particularly for three cars and above, should be higher.

I support the principle the surcharges for subsequent permits particularly if some households have 3,4,5 cars or more. It seems excessive.

Overall it is clear charges will be going up for households with multiple vehicles/larger vehicles which I agree with.

5. Responses / objections from statutory consultees:

- 5.1. Statutory consultees were notified of the proposed changes.
- 5.2. Four Haringey Councillors submitted objections to the consultation:

Reason for objection / comment

Dear Traffic Management Group,

(Resending due to missing image under point 2.)

In my capacity as the local councillor for Harringay ward, I am writing to express my strong objection to the proposed removal of daily visitor parking permits. I wish to emphasise that the concerns raised below are widely shared among residents in the ward I was elected to represent, hundreds of whom have contacted me since the proposed measure was announced.

1. The introduction of hourly visitor parking permits will bring the cost of one day of parking in my ward up from £5 to £13.20. This is a financially prohibitive cost, which will be especially difficult to bear for low-income residents. The effect of this significant price increase will be to limit the number of visits that residents on modest incomes can receive each month, which will pose an especially significant hardship for certain groups of people in our community. For instance, I have been contacted by several elderly residents with a modest pension who have outlined that this proposed measure would limit the number of visits they can receive from family members, thus putting them at risk of loneliness and social isolation. I have also been contacted by new mothers on statutory maternity pay (£184.03 per week) – including mothers of babies requiring special care and support – who have pointed out that this high cost could limit their ability to regularly seek support from friends and family at a time when this is especially needed.

Reason for objection / comment

2.

3. The proposed measure is also inequitable as it will have a far greater financial impact on residents in those wards in our Borough that face the highest levels of deprivation. The removal of daily visitor permits will disproportionately impact wards in the east of the Borough where CPZs are in effect all day. Meanwhile, residents in more affluent wards like Crouch End and Muswell Hill, where parking restrictions apply for a much shorter time, will need to purchase fewer hourly permits. The image below, which a Harringay resident shared with me, highlights that the highest costs for a full day of visitor parking will be paid by residents in wards in the highest deciles of deprivation. 4. The proposed measure would also impose an unreasonable administrative burden on residents. In Harringay ward, where parking controls are enforced for 10.5 hours per day, residents would be required to obtain eleven consecutive permits just to cover one day. This is excessively time-consuming and will inevitably lead to human error and resultant fines.

5. Finally, I am unconvinced that sufficient evidence has been brought forward to justify this proposal. Haringey Council's Highways & amp; Parking Service has confirmed that the proposal is only supported by anecdotal evidence of incidents of misuse of parking permits. Anecdotal evidence is insufficient to justify the introduction of a measure that will impose such significant financial and administrative burdens on residents. Moreover, while it is no doubt true that a minority of residents misuse the parking permit system, it is unfair to increase the costs faced by all residents to curb the abuses of a small non-compliant minority. It would be more appropriate to address these incidents of misuse through enforcement measures.

While thanking you for kindly considering my objection, I strongly urge you not to proceed with the introduction of this measure.

Regards,

Cllr Anna Abela (Harringay ward)

To whom it may concern,

I am writing to raise my objection as a ward councillor (Tottenham Central Ward) to elements of the consultation as highlighted below.

Remove Daily Visitor Permits

I am extremely concerned that the proposal to remove daily visitor parking permits and only have hourly visitor parking permits available will severely impact residents living in the East of the borough where the majority of streets have CPZs in operation Monday to Saturday 8am to 6.30pm (8.5 hours), and on days were events are taking place at the Tottenham Hotspur Stadium restrictions may be in place from 8am to 8pm (12 hours).

£1.20 an hour might not seem like a lot of money however for residents living in the East of the borough where CPZs are in operation for much longer hours than the West of the borough where CPZs are in place for two hours this becomes a lot. For a resident living in the East of the borough that has family or friends visiting, if you multiply the hourly fee by 8.5 (standard Monday to Saturday operating hours) that amounts to £10.20 a day; £5.20 more than the current £5 daily permit. For match or event days that amounts to £14.40 a day; £9.40 more than current £5 daily permit. These residents do not have the

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Reason for objection / comment

luxury of asking visitors to visit them at certain hours during the day where a visitor permit would not be required. The only time for them is at nighttime. For residents aged 65 or over and those registered as disabled, and especially those living in the East of the borough, the 50% reduction to the hourly rate will still have a negative impact.

This proposal not only disproportionately affects residents living in the East of the borough, it affects those on low income, vulnerable, and elderly who may have family or friends visiting them. It is going to have a negative impact on residents already struggling with the cost-of-living crisis where energy costs, cost of food and cost of basic essentials continue to rise. I therefore object to this proposal.

Subsequent permit charging

While I welcome elements of the council's green agenda, I am concerned about the introduction subsequent parking permit surcharges, and particularly the proposed cost of additional permits. The proposal appears to apply an additional £65 per extra vehicle. Households that require more than one vehicle will struggle with this. I urge the council to reconsider the amount charged for extra vehicles.

Kind regards,

- Felicia -

Cllr Felicia Opoku

Labour Councillor for Tottenham Central ward

Dear Traffic Orders,

I am ward Councillor for Harringay ward and am writing to submit my formal objection to the proposal to stop issuing daily parking permits.

This proposal would impose a very significant increase in parking costs for local residents in areas of the borough which have long hours of parking restrictions. This includes my ward where there are at minimum 10 hour restrictions six days a week. Most of these areas are in the east or centre of the borough and would impact poorer residents. This cannot be fair as has been illustrated by the EIA.

Aside from massive cost increases this change to hourly permits would impact family life and impact the costs of a whole range of services to residents such as building works, household repairs.

Finally I would ask that allegations of abuse of daily permits should be properly investigated and evidenced.

Zena Brabazon

Councillor, Harringay ward

Visitor permits feedback from Woodside ward residents

I thought I'd share that some residents in my ward have been very vocally against the proposed changes to daily visitor permits.

One matter that they raise in particular is that people in some of our poorest parts of the borough like parts of my ward nearest wood green have much longer CPZ hours and therefore the change in the permits will affect them disproportionately. Some are older people who rely on visitors for their social life. I think it's disappointing that the equality assessment didn't flag this as a significant factor.

Reason for objection / comment

As a result, residents in some parts of the ward are now querying what they see as 'long' CPZ hours and want to know what would be a process if they wanted these to change.

It's also clear many residents don't know about the permit exemptions for carers, and LTN exemptions for blue badge holders. I think these could do with being promoted more and we could link up the traffic/parking teams and the social care teams to help us reach more people who need this assistance. Thanks,

Lucia

Lucia das Neves

Councillor for Woodside ward

Cabinet member for health, social care and wellbeing in Haringey

5.3. Council response:

- Response to objections relating to the proposed discontinuation of daily visitor permits can be found in paragraphs 3.25 to 3.28.
- Response to objections relating to the proposed Incremental subsequent permit surcharging for a range of permits can be found in paragraphs 3.6 to 3.9.
- Response to comments on consultation process / evidence can be found in paragraphs 3.29 to 3.33.
- 5.4. Haringey Cycling Campaign submitted a response to the consultation:

Reason for objection / comment

Thank you for consulting Haringey Cycling Campaign. I confirm HCC's support for the majority of the proposed changes, however a number of our members have questioned the fairness of removing the visitor's day permit, as the daily parking cost in some CPZ's, for making family visits etc, could be very high. Could there be a case for retaining visitor's day permits, but priced in such a way that makes people think carefully about whether brining a car is the best choice? For example the permit might be priced higher than the TfL daily PAYG fare for zones 1-3, \pounds 10.

Removing the visitor's day permit could lead to a general backlash against all of the proposed changes. Could this be reconsidered? Best regards,

Michael Poteliakhoff

Consultations Coordinator HCC

5.5. Council response:

• Response to objections relating to the proposed discontinuation of daily visitor permits can be found in paragraphs 3.25 to 3.28.

6. Detailed comments

6.1. Example comments and objections on proposed measures

Proposal: Updated permit charging structure, to include a new EV charging tier

Reason for objection / comment

Currently I object to this proposal. There are insufficient EV charging facilities to make the large scale switch for those dependent on on-street parking (I live in a second floor flat without parking on site). EV drivers will generate demand for spaces regardless of the emissions and many EVs are quite large.

While it is true that BEVs do not contribute to local emissions, it is also true that they are heavier and more powerful than equivalent internal combustion engined vehicles causing increased wear and tear on the highway infrastructure. I cannot see the justification for a reduced band.

I do not agree with the introduction of a new permit charging tier for fully electric vehicles. While I understand the need to incentivise environmentally friendly choices, electric vehicles remain financially out of reach for many people. Creating a tier that benefits only those who can afford to transition to electric vehicles could unfairly disadvantage lower-income residents who are unable to make this shift. A more balanced approach would be to continue incentivising electric vehicle use without creating undue financial pressure on those still using low-emission vehicles.

Do not agree. Not everyone has the funds to buy an electric car and some residents rarely use their cars therefore not contributing much to local emissions.

The proposed shifting of pricing bands by 1 level for all vehicles excluding EVs represents approximately a 30% increase in parking cost for lower emission vehicles, (e.g. £100 increasing to £130) when the increases are smaller on a percentage basis for higher polluting vehicles. This punishes residents who own the more efficient petrol vehicles. A flat percentage increase would be more fair as it would penalise higher emission vehicles more than lower. This policy is counter to the councils goals of encouraging residents to adopt lower emission vehicles.

First, it's not true to assert that Electric Vehicles don't contribute to local emissions. Electric Vehicles are only as clean as the infrastructure currently used to generate electricity (which still uses fossil fuels in the UK). Second, this runs the risk of putting the cart before the horse. There is virtually no charging infrastructure in Haringey. Friends who own electric vehicles must have access to workplace charging or need to run cables from flats / terraced houses to the street. Personally, I don't believe it's the Council's role to try and incentivise resident's purchasing decisions but if the council insists on doing so it needs to provide the infrastructure first.

Affects the most wealthy - who can afford a new electric car?

EVs are better for the environment but are more expensive and more likely to be purchased by people with a higher household income. This punishes people who are not trading up their vehicles.

Proposal: Updated permit charging structure, to include a new EV charging tier

Reason for objection / comment

We are living through a cost of living crisis and not many people can afford EVs (or their upkeep). Punishing people for this does not feel right.

Electric vehicle drivers should pay a charge to reflect the fact that their vehicles are considerably heavier and cause a lot of damage to the road surface.

Electric Vehicles should be charged as per any other vehicle (they have lower emissions but their increased weight causes more damage to roads and their batteries are more damaging to the environment)

I object to hybrid vehicles being charged a higher rate than EV's.

Proposal: New permit vehicle size surcharging for a range of permits

Reason for objection / comment

I feel that charging extra for larger vehicles would be unfair to those who need a larger vehicle for work (eg delivery or trade van).

This would penalise businesses and tradesmen who live in the area and require the use of vans or estate cars.

The charging by size of vehicle, although in principle is a good idea, I see that a standard size car is included in the higher price of the "medium" car.

This approach is an unfair approach, these vehicle owners are already facing higher surcharges through their Road tax and insurances

I do feel that the proposed charging structure needs to be developed further beyond 3 categories of length and a modest 10% premium for the longest vehicles compared with an almost 10-fold differential for CO2 emission categories.

Please keep it a simple system - one car one permit. Some of the larger cars are used by tradespeople, and it's not fair to put yet another charge out there.

This will disadvantage people with bigger families and accessibility needs that do not have a blue badge. As an example, I am currently pregnant and we've had to get a bigger car as there will be another family member that we'll need space for. If we have more children then we may need more space but it seems like despite paying council tax, feeding into the local economy and actually working for the borough via the NHS, we'd be penalised for this. I also have friends who have parents/grandparents in wheelchairs that they help bring to appointments. They won't have blue badges as they are unofficial carers. There are many reasons people have bigger cars and by blindly ignoring this you are further exacerbating inequalities that they'll already face.

With the size of average cars getting bigger, this isn't Very fair to charge someone based on this.

Reason for objection / comment

This I believe is unfair as some residents have large families and need a larger vehicle, other residents may need a larger vehicle for transportation of work equipment. It is unfair to put a surcharge on larger vehicles who already pay higher vehicle tax levies. There is no mention that a smaller car would get a reduction in its Parking Charge. One fee for all!

First, the threshold for large cars is too low. 4.5m lumps 'normal' family cars - like a VW Golf estate or Ford Mondeo - with large SUVs, and discounts weight, which is what wears out the road. Could the threshold be 30cm longer? A standard parking bay is 5m after all. I also think a year's lead time would be appropriate for residents to change vehicles to respond to your incentives.

Also feels like this unfairly impacts EV drivers which tend to be heavier cars due to battery infrastructure. Agreed that wider vehicles, vans and HGVs have negative local impact and increase road wear. Context should take emissions and size into account rather than simply being one measurement

I understand the case for surcharges for larger cars, but the thresholds seem to be set too low. Even cars as small as a VW Golf (4.3m) or Polo (4.1m) are more than 4m long, and would suffer the "medium" surcharge, while a Ford Mondeo (4.9m) and Toyota Prius (4.6m) would suffer the "large" surcharge. But a Range Rover (length 5.1-5.3m) would cost no more than a Mondeo or Prius.

Disagree - this could unfairly impact larger families who require a larger vehicle to transport their families. If making best use of parking spaces was the actual concern, painting lines delineating each parking space would be a fairer solution.

I strongly oppose this change. If this goes ahead, families with multiple children to whom bigger cars is sometimes essential will be penalised when they are the one who often are under the most financial stress.

Please think about the vehicle size idea. e.g. We have two cars: one small petrol and one large diesel. The diesel gives off less CO2 and waste gases than the smaller petrol car. it is the same weight (within 10%) Please consider and clearly define what you are taxing.

This will negatively affect poorer residents who need a larger car

The other main objection is charging on length of car. This is where everything starts to get over-complicated. I have no idea how long my car is so I don't know what band I'd fall into. People just won't understand what charge will apply to them.

Penalizing owners of larger vehicles with higher permit charges is not a fair or effective solution. Larger vehicles, such as family cars or vans used for work, are often essential for many residents. Disproportionately increasing the cost of permits for these vehicles places an unnecessary financial burden on families and businesses. This policy assumes that people have the flexibility to choose smaller cars, but for many, this simply isn't feasible. Additionally,

Reason for objection / comment

this surcharge may disproportionately impact those who need larger vehicles for accessibility or occupational reasons, leading to an inequitable system.

Currently all vehicles are under the same umbrella and from what I recall it's based on emissions. While size definitely is a concern for in street parking as parking can be scarce in some areas, I believe it would be a more worthwhile investment of change to introduce different rates for different classes of vehicles. By that I mean commercial used vehicles such as vans, small lorries which are seen parking compared to people's private vehicles which can be negatively impacted once again by the proposed changes. In my experience the only issues I personally had to deal with in my small area were vans and other larger goods carrying and commercial vehicles that parked on the road taking up a massive, massive chuck of the space available.

Unfair - larger families would suffer and those with work vans

Charging more for larger vehicles: this adds complexity and confusion into a system that is already over complicated. It's a pointless proposal when existing measures already determine environmental impact.

I have a large car that can transport 7 people, usually filled with my kids and often other people's in order to ferry them around the borough when walking or using public transport is not appropriate (Often due to the age of the kids). Therefore by having a slightly larger than average vehicle I am actually reducing the amount of cars on the road. This should be seen as a positive act and not something that should necessitate an additional cost via an additional tariff.

I object to any surcharges to residential parking permits for any standard size vehicles other than large-length vehicles such as vans

This again seems like another way to increase prices by introducing overly complex rules.

I couldn't believe my eyes when I read this for the first time. There is a massive amount of parking space where I live because the current system stops anyone to park anywhere. So introducing a charge depending on the vehicle size doesn't make sense. It also discriminates against larger families. Families with children, or those who require larger vehicles for mobility aids, often need larger cars to accommodate their needs. Charging extra for larger vehicles can disproportionately impact those who rely on these cars for essential daily activities. It would impact more lower-income residents, and those who have no practical choice but to own larger vehicles. Abolish the vehicle size surcharging.

The proposal to introduce a surcharge based on vehicle size raises concerns, particularly for larger families or those who require more space for mobility aids. Families with young children or elderly relatives often need larger vehicles, and imposing a fee based on vehicle size could disproportionately affect those already struggling financially.

Reason for objection / comment

This would also place an additional burden on those who have no choice but to own a larger vehicle, particularly in lower-income areas. I understand that you have campaigned for policies that support working families and those with specific mobility needs—how does this proposal align with your vision for a fairer, more inclusive borough?

Larger cars are typically required for families with young children or disabled persons and therefore it is unfair to charge on this basis.

This proposal is ludicrous and attacks the vast majority of residents due to the criteria suggested for the dimensions of a 'medium length vehicle' as this will apply to most, if not all, households with a vehicle that is able to seat more than 2 passengers. Immediately, this penalizes families and without valid justification. To my understanding, the size of the bays currently marked within Haringey for residents are based on being suitable for 'medium length vehicles' as vehicles from 4-4.49m are a societal norm, this does not warrant a surcharge as there is no additional strain on space or road conditions. A surcharge for 'large length vehicles' e.g. a van is reasonable and understood as such vehicles require more parking space and therefore reduce availability for others.

I object to the proposal. Each car still takes one parking space, regardless of size, and sometimes even small cars manage to occupy two, if parked incorrectly. Charging for size makes the permit system more complicated. Exceptionally big vehicles, such as vans, camper vans and trucks which take more than one full bay should indeed be in a different category, if this is not yet the case.

Charging per length of car should not be part of charging structure. Agreed it could be reasonable to charge more for vans or lorries.

I strongly object to this as there are already existing surcharges e.g. emission charge for the vehicle as well as additional extra charge for additional cars per household. Charging by the size of the car is extremely obscure, is a stealth tax on large families who require a larger vehicle as well as unnecessary as there is no size differential in the parking bays at present. Therefore, in my opinion this surcharge would be nothing more than the council looking for ways to increase revenue taking yet again from its residents.

This is simply a tax on families. Larger cars are necessary for additional passengers and storage e.g., children, groceries for a family of 5, etc...In addition to this, larger cars are safer than smaller ones.

Permits are already scaled in fee according to vehicle emissions.

I strongly object to this proposal, as there are already existing surcharges, such as the emission charge for vehicles and additional fees for extra cars per household. Charging based on the size of the car is both unreasonable and unfair—it's essentially a stealth tax that disproportionately affects larger families who need bigger vehicles. Furthermore, it is unnecessary, given that there are currently no size restrictions on parking bays. In my view, this

Reason for objection / comment

surcharge would simply be another attempt by the council to increase revenue at the expense of its residents.

I am broadly in favour of this. However, I would like to know that there would be an exception for those with access needs, or with 4+ children, who need a larger vehicle.

The change doesn't actually reflect the size of vehicle, merely its length. While this is understandable from a pure parking perspective (it is the length which determines how much linear distance a parked vehicle takes up), it has the risk of penalising those who might legitimately need a longer vehicle (eg families who need the extra space).

Larger vehicles are already paying more for road tax and resident parking due to higher emissions, so should not have yet another charge

The proposals of charges related to vehicle size will penalise families, and the larger families most as those that are the group that need the larger cars to support their family. Many journeys are not feasible, particularly those associated with youth sprots clubs. In addition the carrying of sports equipment and kit, for amater clubs, needs a vehcile with suitable space.

Proposal: Incremental subsequent permit surcharging for a range of permits

Reason for objection / comment

This is a very blunt instrument and could be seen to discriminate against large households, particularly multi generational households.

Disagree, unfair bias to larger families or groups.

This would be unfair on the larger families or multi occupancy houses that any additional vehicle is charged extra. A fee is already received, why punish further. Each vehicle registered to the same address should be at the same rate.

Increasing surcharges for additional permits could disproportionately affect larger households or multi-generational families living together. A fairer approach might involve assessing household needs individually rather than applying blanket surcharges.

Very unfair on households which have a number of adults living together. If three adults each have a car in such a household they would pay a surcharge while if the house was split into three flats they would not.

If the intention is to isolate people from family and impact their wellbeing, then having this change will do that. There are families that have more that 4 people in it.

Having more than one car in a household is at times is a necessity. Already paying, insurance, maintenance, tax on 2nd car is quite expensive. In most

Proposal: Incremental subsequent permit surcharging for a range of permits

Reason for objection / comment

cases the car actually is not worth the amount you pay to have it. However, in our circumstances for example, we have 3 special needs children and having a 2nd car gives us a bit of flexibility in transportation. I take one car to work where other car is available for school runs etc. please consider this charge.

Unfair — if permits are being given to carers or helpers for example

Places an excessive financial burden on residents and local businesses, disproportionately affecting families and essential services. This punitive approach to vehicle size penalizes households with larger vehicles, who often require them for legitimate reasons, such as larger families or occupational needs, without offering sufficient alternatives.

Introducing surcharges for additional permits unfairly targets households with more vehicles, particularly multi-generational families or shared accommodations. This fails to consider that different households may require multiple vehicles for valid reasons, such as work, caregiving responsibilities, or household logistics. This surcharge is overly punitive and adds further financial pressure on families.

We already pay a surcharge for an additional car ; again any planned increase in this is surely just a revenue gain mechanism and unfair on working families with 2 cars

Considering that all our details are already on file for the first permit why should there be any more charges? Many people have multiple vehicles for different purposes, and should not be penalised for living in our area.

This seems excessive and unnecessary. It does not take into account the number of residents in a house (which could affect the number of visitors), personal circumstances, size of extended family and friendship group or any other extenuating circumstances.

Increasing surcharges for households with multiple vehicles unfairly penalizes car-owning residents. This seems like a revenue-generating tactic rather than a solution to parking issues.

The proposed surcharge for subsequent permits will unfairly penalise larger households or those with multiple drivers, leading to higher costs that might not reflect their actual parking needs.

While I appreciate the aim of managing permit allocation, this new structure is excessively punitive. The escalating costs for households needing more than one permit, especially in multi-car families, will disproportionately affect larger households and those who may not have other practical transport alternatives. The flat-fee structure currently in place provides a more equitable solution and should remain unchanged to prevent unnecessary financial burden on residents.

Proposal: Incremental subsequent permit surcharging for a range of permits

Reason for objection / comment

I cannot agree. Some houses are house shares and have multiple familes under one roof, this would then punish them Vs other people who have their own house.

Again, I understand the thinking behind this, but worry it penalises young people who are more likely to live in housing with multiple young people. This is a different need case to a family and makes it even more expensive for young people who already have difficulty with housing. I would resist this, especially for HMOs.

Additional Costs for Larger Households: The surcharge for multiple permits in a household may increase costs for families or residents sharing multi-vehicle homes.

Objection: The amount of permits that a household requires makes no impact on the amount of cars needing to be parked. This proposal has no credible reason for implementation and only serves to place an undue financial burden on households who require multiple permits. There is no reason for households who need more than one permit to be financially punished.

I contest this proposal, as it imposes an unfair financial burden on residents who may have legitimate needs for multiple permits. For instance, in caregiving situations like mine, the requirement for multiple permits is unavoidable. Implementing surcharges without accounting for individual circumstances fails to consider the varied needs of residents. At a time when many are already facing financial hardship, this measure appears inequitable and unreasonable.

Introducing new surcharge for additional permits is likely to deter people from buying more cars and will only add burden to people and households that have a genuine need for additional cars.

The proposal to surcharge additional permits feels like a punitive measure, particularly for larger households who may need more than one vehicle permit. Many families, including mine, rely on the flexibility of additional permits, and the proposed surcharge creates an additional cost that could be a significant burden. Given the existing financial pressures on families, this policy appears to unfairly penalise those who need more permits to accommodate their daily life. How does the Council justify this surcharge in the context of supporting local families and reducing financial inequality?

Two cars are often required as one is a work van or car and therefore a second car is necessary to be able to commute etc.

As I am sure that Haringey are aware, we are currently subject to a cost of living crisis. The rapidly increasing cost and shortage of housing means that more and more people are forced to live within shared accommodation all under one address. It is unfair to have a surcharge based on the number of permits allocated to a household as a rising number of addresses do not contain a nuclear family. I would like to know what explanation Haringey would

Proposal: Incremental subsequent permit surcharging for a range of permits

Reason for objection / comment

provide for e.g. a house share with 3 separate individuals who would like to know why they are all paying a different price for the exact same permit. In addition to this, again due to the cost of living crisis, it is not feasible for the majority of people to car share due to increases in working hours and childcare commitments. For example two full time working parents with a child/children more often than not need to be in two different places simultaneously and therefore need more than one vehicle which they should not be punished for. This same sentiment also affects local businesses within the area. Furthermore, if Haringey residents are able to use alternative ecofriendly methods of travel, by creating subsequent permit charges, it seems that vehicle owners are still being penalized even when their vehicles are stationary at home.

This is an extremely unfair taxation of families and others who for financial reasons do not have a choice but to share one household. In addition, there is already a surcharge for additional vehicles. So what the council is proposing is to pay a progressively increasing surcharge whilst we the residents are still paying Council tax, Road tax, Income tax with no additional services being provided. The roads will not be any cleaner, the parking bays will not be any larger, the increased traffic congestion due to the introduction of the LTN will not be relieved, the increased clutter and hazards caused by the Lime bikes will not be dealt with yet I and others are expected to pay more for parking our cars which are necessary in order to earn income in order to pay for services not provided!

If residents are vulnerable in anyway and need carers/regular visits from family and friends, then this proposal disadvantages them in a way that I would not support.

I support the spirit of the proposed idea, but households with multiple drivers should not be disproportionately penalised.

The addition of a surcharge for multiple permits per residence is unfair. Some residents who may still be living with their parents, hence are short on money, require a vehicle in order to travel to and from work. Additionally, if all members of the family work different jobs which are based in different locations around the UK a different vehicle is required in order for adequate transportation. Adding a charge to a basic daily need is unnecessary and unfair.

Proposal: Electric vehicle charging bays / parking in Pay & Display bays

Reason for objection / comment

I am concerned to see introduction of charges for EVs and hope this considers the wider impact in encouraging uptake of EVs and improved air quality. People should not have to pay twice - for their resident permit and for their EV charging.

Proposal: Electric vehicle charging bays / parking in Pay & Display bays

Reason for objection / comment

It seems very unfair for people who have done the right thing in buying an electric car but cannot charge at their property so have to use the Council's charging points.

I am concerned that your plan to introduce pay and display for EV charging bays would penalise EV drivers and discourage people from switching away from petrol and diesel vehicles, which would undermine your clean air strategy. Few houses in the borough have off-street parking and are able to charge from their home, so residents who buy electric cars have to pay a premium for using commercial chargers. If they had to pay an additional fee each time they charged their car this would add considerably to the cost of running an EV. At the least, I would urge you to allow residents to use chargers within their CPZ without having to pay a parking fee.

Charging EV's to park whilst charging is an odd way to encourage the use of EV's in a borough where so many properties cannot fit their own. There is no other way these cars can charge yet you are proposing they have to pay again for the privilege. Already these vehicles bring a willingness of dedicated behaviour change without the necessary infrastructure to support it. You are proposing to charge people twice: to park at home and then again to charge their car. How is this anything but a money-making scheme?

This is not an incentive to keep the EV transition plus users are already paying for their electricity charging.

We are already paying for the charging facility and it is costly to leave the car charging when the battery is already full. This is already a big incentive not to leave the car on a charge longer than it needs. We were encouraged to buy low emission vehicles and now are being penalised for it.

This is contrary to the councils's green ambitions and will disincentivise electric vehicle take up. This will disproportionately affect less wealthy individuals that cannot afford off-street parking. Electric vehicle users who rely on these bays already indirectly pay the council to use them through higher kWh rates. Why are electric vehicles being targeted when the council already uses the leasing of electric bays as a source of revenue?

1. A large proportion of residents in haringey live in properties without access to off street parking. This means that, owing to laws against running cables across public footpaths it is impossible to charge an EV without using a public charger. To add this parking fee will make owning an EV less attractive as it will become more costly and 'topping up' is already fairly inconvenient if you have to walk to a public charger in the first place. 2. Source london charge idle fees already! This I believe is the correct way to ensure that people don't hog charging bays. It seems wrong to charge a parking fee when the users intent is not always to park it is to charge!

- This would mean EV owners would effectively pay twice for EV charging. Once for the charging itself, which is already at a much higher cost per kWh than domestic tariffs, and which Haringey is likely already making money from Proposal: Electric vehicle charging bays / parking in Pay & Display bays Reason for objection / comment

through licensing of the spaces to the EV charge point operators. And secondly for the pay and display parking charge.

- Many of the existing Source London charge points in Haringey are 7kW, an EV with average battery size of 80kWh would take up to 12 hours to fully charge. Therefore the pay and display parking charge could be excessive (the other 22kW chargers are more suited for pay and display charging, as full charge would take around 4 hours).

- These measures could provide a further disincentive in Haringey for EV ownership, which already has a much lower number of properties with off-street parking

- Haringey should look to other boroughs like Hackney, where EV charging points are incorporated in regular lamp posts (ubitricity.com), so residents can charge their EVs overnight or longer while parked in regular resident parking areas.

While increasing turnover and access to EV charging bays is important, introducing charges could deter EV adoption, contradicting broader environmental goals. A more balanced approach might involve a tiered pricing structure that encourages short-term use while still supporting long-term sustainability goals.

I don't think this is fair at all. As a fellow EV charging user, I believe its very unfair to be charged a fee on top of charging fees. As informed by Sorce London, our charging fees include parking fees and you pay £4 a month if you live in the borough which I pay. To introduce fees to park in a charging bay and charge would be an extortion and that would mean I am being double charged. I think this is such a scam. The government encourages us to drive lower emission vehicles now it seems that you people are now trying to get more money out of us for doing so and I think it is very unfair. I most certainly do not agree with this proposal. You may argue that some people stay for long in these charging bays so a fee for parking in there would deter people from doing so but at the same time, you are only allowed to stay for a certain amount of time and if you leave your vehicle plugged in on full charge you are then charged a idle fee. There is no acceptable reason to charging for parking in a EV charging bay and charging your vehicle.

These vehicles need to be encouraged, this seems like a discouragement

The new proposal to have these bays be Pay and Display would significantly increase the cost, and feels punitive when I am already paying for a resident parking permit for the car, as well as the cost of the electricity to charge.

How can removing the free parking, and charging for EV charging bays and for permits encourage people to buy them?

We should be doing everything we can to encourage a move to EVs. Petrol cars are never charged for the time they are stationary while refulling, penalising electric cars while undertaking the same activity doesn't seem to tie into the boroughs effort to reduce Co2 emmissions.

Proposal: Electric vehicle charging bays / parking in Pay & Display bays Reason for objection / comment

This could discourage EV use, which contradicts environmental goals. Charging residents for using these spaces, especially when they are already paying for vehicle permits and electricity, adds an unnecessary financial burden. I believe EV spaces should remain free or discounted to encourage the transition to cleaner vehicles.

If the intention here is to increase turnover, rather than increase fees, then an alternative approach could be used. It seems unfair to charge the drivers twice as they are already paying to charge. I don't know how long it takes to charge an electric car but you could make the bays eg 'max 90 minutes' which would also increase turn over

This new charge is a non-sense because the people charging their EVs are already being charged by the electricity provider an idle fee per minute as soon as the vehicle is full and still connected to the charging point. For example: Source London charges its costumers 4p/min in idle fees (after a 10 minutes grace period). So the intensive is there to remove the car as soon as it is charged. I am a frequent user of their service and I never experienced a problem with turnover and access to these places. Where does that information comes from? What are the facts on this? Charging electric vehicle (EV) owners to use designated charging bays, in addition to the cost of electricity, is both inequitable and counterproductive to the Council's environmental goals. EV owners are already paying for the electricity they use, which is typically billed at a rate higher than residential electricity to reflect the infrastructure and maintenance costs associated with public charging. Introducing an additional fee simply for occupying the charging bay would be an excessive financial burden, particularly for residents who have made the transition to electric vehicles in support of Haringey's sustainability objectives. Further, this additional charge could discourage EV adoption, as residents may see rising costs and limited support as barriers to switching from petrol or diesel vehicles. Penalizing EV owners with extra parking fees in addition to charging costs would undermine efforts to reduce local air pollution and meet carbon reduction targets. In this context, the Council should focus on making EV charging affordable and accessible, incentivizing the shift toward cleaner transport options rather than imposing an additional fee that could stall the adoption of greener vehicles and undermine Haringey's environmental ambitions. Abolish that charge and ask the energy provider (like Source London) to transfer you all the idle fees they perceive, instead of charging the residents.

I object to the proposal. It will further deter motorists from buying EVs. What the council really needs is more charging sockets, ideally in each lamp post and next to each parking bay. They do not have to be powerful. As long as they can charge vehicles overnight, they will be more convenient than going to and waiting at dedicated stations/bays and should serve the intended purpose of promoting EVs. I am not switching to an EV myself primarily because of difficulties with charging it.

Proposal: Electric vehicle charging bays / parking in Pay & Display bays

Reason for objection / comment

I do not agree with Charging electric cars parking charges at the Charging bays - that is counter productive , it will not encourage drivers to purchase electric cars.

Charging a driver for parking in a space that is needed to recharge his/her car would be no different to charging a driver for parking on a gas station forecourt in order to put fuel in his/her tank!!!

Disincentivising EV ownership - adding a charge for EV owners for temporary and/or bay parking merely disincentivises replacing petrol vehicles with electric ones. Harming the environment in the long-term.

An additional cost to charging could make owning the EV unviable as I cannot charge domestically. The proposal cites turnover as a reason for the policy, however I've never had to wait for a free charging bay so there is currently no issue there.

The proposal is supposedly to increase turnover and access to these spaces, though as an electric vehicle user for the last 3 1/2 years I have not noticed any issue with such access, especially with the increase in their numbers over the last few years. Many, indeed most, owners of electric vehicles do not have the ability to charge their cars at home in the Borough, and charging at the on-street public charging points, the cheapest and most convenient way to recharge, are mostly of the low power variety, typically 5kwH or 7kwH, meaning that charging necessarily takes a number of hours. I cannot see any reason for parking charges to be levied on EV charging bays, no more than you would charge a petrol or diesel car owner for entering a filling station. If the Borough wants to encourage more electric car usage/ownership, levying additional costs such as proposed seems to be a very strange way of going about it. This, by the way is in addition to additional charges about to be introduced for Vehicle Excise Duty, and the ending of the Congestion Charge exemption, which will add to costs for EV owners who already have to pay the higher costs of EV purchase in the first place. Please reconsider these proposals, at the very least to allow residents who have parking permits to use EV charging bays in their zone without additional cost. Not to allow at least this would seem counter-productive to encouraging the switch to EV vehicles which I thought was part of the plan for Government Net Zero targets.

The lack of exemptions for residents using EVCPs within their own CPZs is particularly punitive and undermines the council's commitment to promoting electric vehicle use.

In the era of encouraging the world to convert to ev, i think to keep as many incentives as possible at this crucial time is essential (the take up has been far slower than the government first anticipated, and targets are being missed annually)

The charging services provided by Source London are already incredibly expensive. They went up rapidly when electricity prices spiked post Russia's invasion of Ukraine, and have not come down despite the sharp fall in electricity prices since. There are also plenty of bays (at least in my

Proposal: Electric vehicle charging bays / parking in Pay & Display bays Reason for objection / comment

experience of the Highgate / Crouch End area), so the incentive for residents to move their cars quickly is simply unnecessary. If you wanted to disincentivise people lingering in these spaces, it would make more sense to increase the idle charges applied via the electric charging point itself. Simply increasing the cost of charging is going to further disincentivise the use of electric vehicles. This is particularly relevant for plug in hybrid EVs. The cost of the charge with Source London already makes it uneconomical to use any electric charging - it would be cheaper to simply use petrol. A decision to add to this cost would create further challenges to the council's desire to create a cleaner area.

This is a double cost, once for charging the EV, one for parking and discourages the use of EVs. Measures to discourage people from parking in these bays even when the car has finished charging would be more reasonable

This is simply not needed and will discourage drivers from converting to electric vehicles, thus reducing emissions. Parking in these bays is already very expensive because of the Source contract that haringey have, leading to inflated charges by Source (other companies in London are significantly cheaper). To make people also pay to park in these bays is adding a secondary charge. I have never had a problem parking in these bays and most companies already have 'idle' fees (source do this). There is no evidence (or sound logic) that these charges will improve turnover.

To charge someone a fee for using a paid service of an electrical charging is ridiculous and unfair. I thought you would like to promote a cleaner less polluted borough and to encourage tenants to think about changing to electric cars not to penalise them.

Proposal: Change of address administrative charge

Reason for objection / comment

It's already hugely expensive to buy a new home and the costs associated with moving home are significant. This admin fee appears to be very petty.

It is the same as charging for registering for council tax at a new address. Changes could be handled automatically and corroborated with council tax bill information in the IT system.

Paying to park in front of our door is already a significant expense, and this alone should cover all costs involved. However, the additional charge for something as routine as updating an address is a burden that unfairly targets permit holders who are already paying substantial fees for the permits themselves. This change will lead to an unnecessary financial burden, particularly for those who must move more often due to personal or economic circumstances.

Proposal: Change of address administrative charge

Reason for objection / comment

Why would this be considered fair especially as the individual is also paying Council tax as well which ought to be covering any administrative fees incurred by the council in doing their job in the first place.

Please do not do this - nobody moves for fun and there are enough associated costs for moving without being charged for the change of address on your parking permit.

I do not agree with this, because people do not move for the pleasure of it. It is a very stressful process and most time, people do not have the choice as to when and if they move. They do this out of necessity. By imposing charges, the council will only be adding to the burden.

A simple process of changing address on an existing electronic permit should not attract an administrative charge.

The administrate charges seem unfair as all changes are made electronically online.

Introducing an administrative charge for a change of address may disproportionately affect those who are low-income or elderly, who might struggle with additional costs.

To introduce administrative charges for the processing of parking permits when there is a cost of living crisis is appalling. The council should be encouraging people to do the right thing and apply but now you are proposing they have to pay for a service that their council tax should cover. Its double dipping.

There is already a charge for permits and there doesn't seem to be any good reason for requiring an extra charge for a change of address within the borough.

1. Can the council demonstrate the cost to them for a user to change their address on the portal when it will all be completed by the resident? 2. Surely the cost of the permit covers the cost of administering the permit?

Why? Since it's all done online, what exactly is the additional admin? Given how difficult it usually is to get any service from Haringey online or off without having to spend an excessive amount of time dealing with glitches and the failure of the system to accept the simplest of answers, we should be allowed to charge Haringey an administrative cost for wasting our time.

The additional charge for something as routine as updating an address is a burden that unfairly targets permit holders who are already paying substantial fees for the permits themselves. This change will lead to an unnecessary financial burden, particularly for those who must move more often due to personal or economic circumstances. Furthermore, the process of updating an address in modern administrative systems is often automated and requires minimal labour or resources, especially if done online. Charging for such a minor update is nothing but an unnecessary revenue-generating measure rather than a necessary cost recovery. Instead, the local authority should look

Proposal: Change of address administrative charge

Reason for objection / comment

into streamlining or automating these processes to keep costs low without passing fees on to us as users.

The additional work caused by this is minimal.

An administrative surcharge should not be implemented, over and above the charge that permit holders pay to have a permit. The amount of administration it takes for the council to implement a change of address is not proportionate to the proposal to introduce an administrative charge. This should fall under the services offered by the council through council tax.

This just seems another way to make money for the council. If one moves house and changes to eg council tax are made, why can this not automatically feed through to all other council admin processes? There should be no charge.

There should be no charge for this as this making changes is part of the job of the council. We are essentially having to pay for a service that we already pay for through our taxes. It also penalises people on low incomes and those of us who live on our own and struggle financially.

If people move within the same parking area they will be very unlikely to pay to change address. How difficult and costly can it be to administer a change of address now that the permits are all electronic, there will not be any postal charges, it should take a minimal amount of time. I can never understand why you ask for proof of address when you must surely have access to the list of people paying council tax at a property.

This should not be necessary. The permit fee should cover administration.

Strongly disagree, this should be provided free of charge

Our permit charges already cover administration - why should you charge more for these aspects?

Why, everything is done on line so why is there a charge? If it does happen the charge needs to be minimal eg a similar amount to what a cinema charges for online bookings

Proposal: Rejected permit applications administrative charge

Reason for objection / comment

I have really struggled when it comes to providing the required documents, sometimes because I just don't have them and sometimes because your system just won't recognise my fully legitimate documents. I have had to send emails and complaints in order to be able to verify my identity and address. I don't think it's fair to charge for failed application unless these glitches in your systems are addressed.

This should be limited to dishonest or fraudulent applications.

Proposal: Rejected permit applications administrative charge

Reason for objection / comment

Parking users are already covering these admin fees plus the prices to apply sometimes takes too long so I think is so unfair if additionally you could also be charged for simply using your right of applying.

My fear is that this will disproportionately impact on people with lower literacy or English not as a first language

This is just a way for you to reject everything for no apparent reason and make money . if you reject their application , they dont get the permit, why should you make money from their rejection if you are not providing a service and they are not getting a benefit. I think this is a ludicrous suggestion.

There may be residents who do not have English as a first language or may not be technologically advanced enough to scan and upload documents (especially older residents). This sounds like penalising someone for not understanding the online system either due issues surrounding language, technology skills and/or potentially many others.

Your revenue should come from the purchase of parking permits for residents and/or visitors.

While I understand the desire to recover costs, this proposal may discourage residents from applying, particularly if they are unsure about eligibility but need to apply out of necessity. Instead of penalising applicants, the focus should be on better educating residents on the criteria or improving the guidance provided to reduce the likelihood of rejections.

You are essentially making people pay for something they are not even receiving which is not fair. I do understand that assessing permit applications does take time and money but this is one of the council services that is paid for via our council tax.

This is incredibly unfair. Some residents are less IT literate and will unknowingly make mistakes when applying for or renewing a permit. It doesn't cost Harringay more to administer these rejected applications.

Quite often people who are applying apply in good faith and accidentally make an error in the application, perhaps misunderstanding the instructions. This seems very harsh to be charging them for this type of error.

This is an awkward and frustrating process made purposely difficult in order to gain this fee. It costs the council nothing therefore no monies should be due.

I have had one application rejected although I met the criteria and sent in the relevant documentation only to be told it was rejected but not on what grounds. This is contrary to natural justice and people acting in good faith should not be financially penalised.

Charging an administration fee for rejected applications penalizes applicants who may have made honest mistakes or misunderstandings regarding eligibility criteria. Instead of imposing a fee, I suggest providing clearer guidelines and support during the application process to minimize rejections.

Proposal: Rejected permit applications administrative charge

Reason for objection / comment

This fee should be collected from the permit refund amount rather than being an additional charge for people to pay. This will avoid an extra cost of living in the current crisis which the council will be adding to.

This is absurd. We all make mistakes. Why should someone be penalised because they misunderstood their eligibility?

Given I've had a handful of erroneously rejected applications from Haringey over the years, this feels seems laughable. * If a permit is rightfully rejected due to fake/false information then it's a fair fee * If a permit is rejected due to erroneous document submission a fee should be waived due to honest mistakes * If a permit is rejected due to failure by Haringey council the fee should be waived and/or refunded if a citizen has had to contest

While I understand the need to manage ineligible applications, I believe an administrative fee for rejected permits is unnecessary. Instead, improving clarity around eligibility criteria and supporting applicants through clearer instructions would reduce rejections without the need for a punitive fee.

Theoretically, applications can be rejected based on many different factors that might not be relevant to the application itself. Unless you can assure that requirements for the application is clearly defined, it's really easy sometimes to reject applicant, producing unnecessary fees. This could also encourage legitimate people to not apply. People may be less likely to apply if they fear they might lose money in the event of rejection. I would object to this change.

If an application is flawed and the applicant is not entitled to a permit then it is appropriate to make an admin charge. But where the error is a simple error and a permit is ultimately issued there should be no error fee.

The fee for a rejected permit should be subject to an appeals process. Whereby application failures caused by something that could be addressed by a process improvement, can be identified.

No extra charges, just do not povide permits without evidence - this will ensure comliance without further rules / taxes / charges - strive for simple.

Your criteria is often unclear. I have had permits rejected in the past based on a tick box exercise. You should be supporting residents to collate the right evidence not fining them. Your rationale to fine makes no sense. The permit is ultimately rejected. Perhaps a limit on the number of times people can apply without submitting evidence would stop abusers. But genuine people who are trying to submit the right evidence should not be penalised.

I think the other admin charges are unnecessary unless it reflects in a reduction in the base cost of a permit.

A specific administration fee for reject permits is most likely going to disproportionately affect those who have had trouble understanding or making the application. There are two reasons for this - firstly, that the person making the application is disadvantaged somehow (language, disability, cognitive problems, mental health etc), or that the forms are poorly designed or have

Proposal: Rejected permit applications administrative charge

Reason for objection / comment

been made needlessly complex by Haringey Council. In both of the former cases, a Rejected Permit fee is not going to solve the problem of incorrectly filled in applications, nor is it likely deter potentially fraudulent applications. Furthermore, unless Haringey Council determines that a particular large amount of money (in the tens or hundreds of pounds) is charged as their punishment levy for incorrectly filled applications, which would be grossly disproportionate and punitive, then the revenue generated from this would be minimal at best.

Proposal: Temporary cover (courtesy car)

Reason for objection / comment

The proposal to introduce a 21-day temporary courtesy and hire car permit across a wider range of permits is not practical or useful. Based on personal experience, when my car was in an accident, it took over two months to repair and resolve the claim, far exceeding this proposed 21-day period. The current rules already impose significant costs on local residents in such situations, and this change would only add further complications and financial burdens. Instead of offering meaningful support, this would leave residents with inadequate coverage, making an already difficult and expensive process even worse.

Extending temporary cover permits does not seem necessary or particularly beneficial. The current system is adequate for most residents, and there is little justification for expanding it to other types of permits. This proposal complicates the permit structure without providing significant benefits to the wider community.

Proposal: Business visitor permits

Reason for objection / comment

Business Visitor Permits- we are struggling with space & you'll will add more commercial parking!

I strongly object to this proposal, particularly in areas like the Gardens where parking congestion is already a serious issue. This area is frequently used by employees from nearby restaurants, who take up valuable parking spaces. Allowing additional permits risks significantly increasing the volume of parked cars, further inconveniencing residents. To mitigate this, there must be strict enforcement measures in place. Any business visitor permit holders found parking in resident-only spaces should be heavily fined to discourage misuse and protect resident parking access.

I can see this potentially affecting the parking here ... just off Green Lanes – and can see it being abused too. (It is open to potential abuse as much if not more than the one-day visitors' permits for residents!) We already do get a lot of parking by visitors to the local restaurants and businesses on Green

Proposal: Business visitor permits

Reason for objection / comment

Lanes. I am not convinced this is proposal about extra visitor permits for the businesses is necessary.

I object - it's hard for us residents to find a parking space anyway.

I also specifically object to the plan to allow for local business permits as this will put a further strain on the already limited number of spaces available to residents.

At a time when the stated priority list has residents above businesses (as listed in your strategy document), and parking is already difficult, it seems unjustified to be allowing additional business-related vehicles without good justification.

Proposal: New Non-Resident Blue Badge Holder Permit for those who work in the borough

Reason for objection / comment

This is challenging and on balance I believe could be open to abuse. i.e. the use of blue badges other than for work purposes only.

While the intention to prevent theft of Blue Badges is understandable, this proposal is unnecessary. Blue Badge holders can already park in designated spaces, and further permits risk complicating the system. Instead, more robust enforcement and anti-theft measures could be implemented to deter theft, rather than creating new layers of permits.

I object as such a scheme is too open to corruption/abuse and likely to become a free-for all for any council worker to be granted a Blue Badge permit.

Proposal: Discontinuation of daily visitor permits

Reason for objection / comment

The removal of daily visitor permits penalises those of us who only use or welcome cars into the area for necessary journeys. We live without a car, but this necessarily means we occasionally need one - for family travel or for visitors / visiting workers etc. Removal of daily visitor permits increases the daily cost here to £13.20, which is out of proportion with other London boroughs, as well as introducing an added admin burden (11 permits needed per day). It sounds like you are trying to solve a problem of people using them fraudulently by removing them from everyone, which does not seem fair, and also I do not see the reasoning of how it will work to prevent misuse.

The Idea to cancel Daily Parking Ticket it's not a good idea. If that would be done that would mean that no one can receive any visitors anymore. That it's very unsocial and not fair. Some times people get family visits and they are coming from far and they could be now in the future no more visit.

Reason for objection / comment

I object to this. Although it is not something I use regularly, it can be necessary from time to time for the benefit of residents' family and friends etc.

1. If we discontinue the daily visitor passes for residents and replace them with multiple hourly passes, this will hike the cost of having a visitor for a day to between £10.80 and £16.20, depending on your location. 2. £3.37 for a business visitor permit per hour is a huge increase. This is not an "incremental" price increase; instead 168% is a steep price hike. 3. The proposal would allow residents to buy "up to 40 visitor permits may be purchased per annum", so only 40 hours of visitor permits per year! That's 4 days. In some CPZ's, and especially during busy event weeks - this means if you have family visiting for more than 4 days, there is no other solution and we would be forced to break the law. The portal won't issue you more than 4 days of permits, per year. 4. The proposal expects residents with CPZ from 8am to 6.30pm to book out 11 x 1hr visitor permits per day via the portal and this is not technologically possible. The website often glitches and is not always reliable. Having to purchase 11 permits per day will likely result in parking fines. Not everyone has the time or the luxury to take time off to go purchase permits in person at one of the Council offices. 5. Haringey's daily permit rates are amongst the highest in neighbouring boroughs. The current cost for a visitor to park in CPZ of other boroughs for a day are as follows: Camden: £8.79 Islington: £7.20 - £8.00 Greenwich: Tradesmen £18.50 per week, Waltham Forest: £8.00 (at £1.00 per hour) Hackney: £5.30 Haringey: £13.20 6. The stadium has also announced 24 more event days so permits for people living here are even more needed. This is in contrast to the proposed policy, which is limiting the possibility to welcome visitors (e.g. family members). 7. Last but not least, the CPZ's in West areas like Muswell Hill, Alexandra Palace, Highgate, Crouch End - are all about 2 hours a day. CPZ's in Tottenham are nearly all 8am-6:30pm full day restrictions. This will penalise residents of the less affluent parts of the Borough and let the richer parts remain richer. This is not fair on residents, especially those living in less affluent parts, and I kindly beg to object to this proposal.

Your consultation talks about doing so to ensure these permits aren't used for anything than their intended purpose, but I'd suggest if there is any misuse it would just be a fraction of the many residents who rely on these and who use them in a completely correct manner. If there is misuse, then why not reduce the number of permits allowed per year from the ridiculously high 999, to something more sensible like 100? Also, only having the availability of one hour permits would be completely impractical when having builders or other tradespeople doing work. To have to check every single hour whether they need an extension? That is not how life works -- it can't always be definite how long a job will take to complete.

This restricts the number of visitors per household per year. This will have serious implications for the elderly or disabled with visiting carers or family. The different time restraints in CPZ's within the Borough means that there is obvious inequality in how the hourly permits will be used and in the cost per

Reason for objection / comment

day in using the hourly permits: Daily use in Highgate or Crouch End will cost £2.40 whilst in Tottenham or Green Lanes will cost £13.20. At the cost of £40.00 residents in Highgate or Crouch End will have 20 visitor days while in Tottenham and Green Lanes only 3.6 visitor days. At a glance one can see that residents in the more affluent areas will pay less than those living in the poorer areas and will be able to receive more visitors. On a practical note this will make work more difficult visiting carers, builders, decorators etc. It is important there is parity / equity within the Borough and it is therefore the Council's responsibility to reduce any inequities.

For those who have family and friends who live outside the borough - which I would assume is a lot of people - they would like the option to have family and friends visit them overnight, and possibly for a few days. The ability to book a few days is a great way to ensure they can drive down - especially for those of us who need cars due to mobility issues but not classified as disabled. Moving this to an hourly service feels like you are adding in more complexity, trying to take more money and not thinking of those who actually use it for the right reasons. A permission to Park permit is already £25 for tradepeople which I think is very steep. I don't want to have to pay this for family members also.

The proposed policy seems poorly thought out and disproportionately affects residents due to concerns about a small percentage of households that may exceed a specific usage threshold. If necessary, such cases could be managed individually rather than implementing a blanket policy. Effectively, this proposal will control and restrict many residents from hosting visitors, limiting them to only a few days per year at an increased cost. Have you considered that many visitors come from outside London and find travel by car to be the most convenient option? For residents like myself, whose visitors sometimes come from areas with limited public transport options, this change is particularly problematic. For instance, I have family members in areas with infrequent bus services that require advance booking and do not run seven days a week, making spontaneous visits challenging. The discontinuation of daily visitor passes for residents and replace them with multiple hourly will hike the cost of having a visitor for a day to between £10.80 and £16.20, depending on location. £3.37 for a business visitor permit per hour is a large increase. I question whether this policy truly addresses traffic management. The recent implementation of LTNs and adjustments to CPZs have already impacted parking control. These additional measures unfairly target residents in the east of the borough. The proposed changes are extremely unfair, I vehemently object to your proposal.

It is of no benefit to residents to remove daily parking permits. The road does not suffer from over parking. There is ample space for residents & visitors. This is nothing more than an attempt to raise funds at the expense of hard working people. It penalises hard working people which goes against Labours promises. We value the daily parking permits & half day permits so friends & family can visit. The system at present works & people willing pay the

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permits. The proposal to move to hourly permits for trades people is ludicrous. It assumes usees are investigated & repaired within the hour. This is a rare occurrence and reflects no reality of day to day house maintenance & repairs. It is another attempt to penalise hard working people.

My partner and I are pensioners, do not own a car and rely on the Daily Visitors Permits on the several occasions during the year that our children and grandchildren (who do not live in London) come to visit and stay with us on weekdays either side of Sundays and holidays. Having to resort to using solely hourly permits at these times would be both expensive and tedious and our family's having to park further away from our house (where there are no parking restrictions) would be inconvenient and ill-advised due to the propensity of car theft and vandalism in this area. Moreover, there are a good number of elderly (and, indeed, younger) people who live on this and surrounding streets for whom the proposed removal of Daily Visitors Permits would presumably pose similar issues when their families wish or need to visit. The background papers provided for this consultation suggest that the reason for doing away with Daily Visitors Permits is to reduce their abuse. But while I accept there may be concern for this, it is unclear where, why and to what extent in the Borough this is the case and, thus, whether there is sufficient evidence/justification for those of us who are legitimate users of the permits to be deprived of them. For example, could there not be a more targeted approach to tackling the abuse rather than a blanket policy which means everyone must be penalised?

Eliminating daily passes significantly limits the ability of family and friends to visit, which is crucial for maintaining social connections and mental well-being. I believe that instead of removing this option entirely, more effective solutions could be considered, such as imposing a cap on the number of daily permits that can be purchased, rather than allowing up to 999. This would address potential misuse while still enabling residents to host visitors.

Furthermore, I am concerned that this policy change appears to prioritize revenue generation over the needs of our local community. With hourly permits priced at £1.20 and daily permits at £5, the financial burden on residents could increase, exacerbating feelings of loneliness and isolation. It is essential to prioritise mental health and well-being by allowing residents to maintain their social connections.

My principal objections are as follows:-- lack of equity across the borough, see chart above (given the very different times that permits are needed for in different parts of the borough). The proposed maximum of 40 permits per year greatly exacerbates this. In some areas this would make it impossible to have work or repairs done on your home, (where daily permits are needed for contractors), let alone to have regular help or company from friends or relatives outside the area. It is almost as if you are trying to prevent poor or vulnerable people from having visitors! In my view this proposal is not only very badly thought through, it is also discriminatory. - Substantially increased cost of permits. Again, this will disproportionately affect those in poorer areas.

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- Disproportionately impact on those without a car (who are therefore more likely to have visitors with cars who can help them with transport) Substantially increased inconvenience. If I need permits (for friends or relatives visiting, (or more likely, for workmen doing house repairs) it is much more complicated to use hourly permits. Your visitor is also more likely to make a mistake, and therefore get an unnecessary fine. Inadequate evidence. I understand that the reasoning for this change is based upon only circumstantial evidence of misuse of daily permits. To enact such a comprehensive and impactful change, which will make life more difficult for many of your constituents, we could reasonably expect that the Council has sought hard evidence, has conducted an impact assessment of the changes, researched alternative solutions, and sought evidence for how effective the various solutions would be at solving the problem. It seems none of this has been done - no properly conducted research into the problem, no alternative solutions, no impact assessment, no assessment of the effectiveness of the solution. And no attempt to mitigate the harms to deprived or vulnerable residents.

This will have a serious impact on many users, particularly those living in zones where all day parking restrictions apply. As always, it will be the most vulnerable people who will be disadvantaged: notably those without easy access to mobile apps who may not know the precise times of their visitors' arrival or departure. Just think of the inconvenience of having to set up 10 separate hourly parking permits when you have a visitor or carer making an all-day visit. I cannot see any overriding need for such a measure.

1) The proposal to discontinue the daily visitors permits, with an option to only pay for hourly permits, is a HUGE increase in price. We regularly have family and friends visiting and my parents help with childcare to enable us to work. This price increase is completely unfair in the cost of living crisis. 2) The proposal expects some residents with a CPZ from 8am - 6.30pm to book out hourly permits, on a website that frequently crashes. 3) Haringey's daily permits would be higher than neighbouring boroughs. 4) The proposals affect those in the east/more deprived areas of the borough so much more than those in the west/affluent side of the borough. This is due to the hours that the CPZs are in effect per day. This penalises the less affluent residents. 5) There has been NO evidence given of the 'misuse' of daily parking permits, so this simply can't be used as a reason to stop daily permits.

As a resident, I make regular use of these permits when visited by close family members who live outside of London. To have to cover entire days using only hourly permits would be more expensive, laborious and in my view greatly increases the likelihood of mistakes that might cost residents a fine.

I object to this purpose change to parking this would cause a lot of problems when I have work men in to do repairs

I object to not having the option for cheaper daily visitor parking permits both for friends and family visiting who don't live locally and also for trade work

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which might happen over multiple days. This is a clear revenue increase that taxes both social and family aspects of the local community.

Removing these permits will be putting a lot of financial strain on residents as the cost of a daily permit will now more than double. There are occasions where my father in law visits from Birmingham during the festival period and I have to put a daily permit on his car. This will now cost me more than double previous £5 now under the new rules it will cost £12 and on match days £14.40. Please reconsider this as this is just another tax on the poor. This will now mean residents can have less and less visitors. My mum is in her 70's and my siblings come to visit. Now they will not be able to come as much.

Instead, I suggest you limit these to a reasonable amount, if you are concerned that there is abuse of the current system. I heavily rely on these daily permits for family visits and tradespeople. Being able to only use hourly tickets is unsustainable, unnecessarily expensive and confusing. Please think about the majority of decent residents rather than the minority who might be abusing the system (which you don't have proof is happening in the first instance!). Daily permits are a lifeline for those of with family who live elsewhere.

This decision will hinder families from reuniting for special occasions and holidays, a vital aspect of maintaining family bonds. The impacts of COVID-19 have already led to significant disruptions in family connections, and with the ongoing financial challenges, it is crucial that families be given the opportunity to spend quality time together. These interactions are essential for mental health and overall well-being, especially in these trying times.

I often require daily visitor permits for tradespeople to do maintenance work / building work to my property, or for elderly relatives when they visit for the day. The proposal to scrap daily permits and suggestion to use hourly permits instead would more than double the cost and would be a significant financial impact to me. This is unreasonable and unjustified especially when the proposal is based on "circumstantial evidence of daily parking permit misuse" - where is the documented evidence and thorough analysis of this evidence?

To remove the daily permits for residents to access will dramatically restrict those coming to visit for various reasons. But especially those who need care.

Frequently, workmen need a day or more to complete repairs or deliver heavy materials and putting in hourly details isn't practical. I don't see abuse of the scheme in my street. Also, if I do buy more permits, I should pay less, rather than more.

Removing daily permits will mean that it is more expensive if visitors or workers have to park for the full day. It will also mean there is more administration for me to do if the length of visitors parking changes. There is no rationale provided for why this change will ensure permits are used for their intended purpose, it just makes things more difficult and expensive for residents.

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While these are more expensive than the hourly rate, they are essential as visits are rarely for an hour or less * Since living in my residence in MHW these are the only type of visitors permits I've ever used as an hour is never long enough * If they are not able to be kept, then the hourly permits need to be able to be used for multiple hours, and made clear that this is the case (as it's not currently clear) * An alternative could also be to make the day permits "24hour" so they can be used for an overnight stay which would currently require two day permits if a visitor stays 12noon - 12noon in the MHW CPZ for example

This change would make a having a visitor to my home cost £13.20 a day as opposed to £5.00 it is at the moment. I understand that the reason for doing this is to stop people selling on passes to commuters and football fans (in the Tottenham area) Wouldn't it be a fairer solution to limit the number of daily passes to 50 per year per house hold? Also I am sure you are aware that this only affects the east of the borough of Haringey which is already having to pay for permits, the more affluent areas only have short restrictions or none at all. I am very disappointed that a Labour council (which I voted for) can be so unfair to half of the borough . Everyone I have spoken to thinks this is a very unfair proposal and are outraged at the price hike . People are already facing financial hardships don't make it harder. Please re consider this plan and take into consideration the community you represent.

Cost - Abolition of daily visitor parking permits increases the cost of all-day parking for visitors from £5 to £13.20, almost tripling the cost. This price rise is completely unjustifiable and will impact poorer households disproportionally. Abuse of daily permits - If a selfish minority are abusing the system of daily permits it is the responsibility of the council to come up with a method of stopping the abuse without the wholesale cancellation of daily permits. The law-abiding majority should not be indiscriminately penalised for the actions of a minority.

I visit an elderly friend regularly and she leads quite an isolated life having very poor eyesight and mobility. She relies on visits. If we learned anything from Covid it was that isolation is seriously damaging to people in her situation. Family and friends must be able to visit their loved ones easily and without restrictions. If there has been abuse of permits tackle this another way instead of penalising the most vulnerable. We have an aging population so the need for direct social support and contact is only going to increase.

Reasonably priced daily parking is really important for carers and supporters of the many vulnerable people in the area, not to mention visiting family. Also, if you have tradespeople doing renovations on a property they need will be present for the whole working day, usually 8am to 4pm. An hourly permit will not be practical and will be unreasonably expensive. Capping the number of daily passes someone can purchase in a year is reasonable, but it must be remembered that many people need formal and informal support from visiting individuals that need to park near to that person a few times a week, every week.

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This is the only objection I have why would you want to scrap these when a lot of our visitors are with us for quite a bit longer than one hour! Is this just a money making scheme? The two hourly visitors vouchers were scrapped some time ago and these were of more use than just the hourly vouchers. Daily vouchers are also used for any workmen you may have or need in your property. Very often these men are only needed for a day or two in order to carry out repairs in your home. What alternative is there for daily visitors that may have travelled a distance to see you and want to spend the best part of the day with you.

I object to the removal of the daily visitor pass. I car share with mum who lives in a different borough as we wanted to reduce traffic in London by sharing a car and to help the environment by sharing a car. It currently costs my £5 a day to park outside my house, this cost would go up to £13 if I were to pay hourly. I am a new mother to be and I need a car. This proposal is ridiculous. It's gone up from £3.80 a day to potentially £13 a day over the past 3 years. There are always parking spaces so I don't know who this scheme is to benefit, certainly not the residents. Furthermore limiting the passes to 40 a year I object to. What gives you the right to limit residents on visitors. Many people who drive are elderly, many have families, and many are too scared to go out at night on public transport and walking the streets due to the crime rates which have increased dramatically making London unsafe. Instead of wasting your time proposing unbeneficial schemes why don't you tackle the real issues around Harringey for residents which is knife crime, robberies and drugs.

This is a completely wrong and unfair proposal. It is said that it is to stop misuse of permits but no one I know has been able to find clear evidence of widespread misuse. The increase in price if you have visitors in our area is absolutely shocking - but would involve no increase for those with the 2 hour restrictions. This then disproportionately affects the poorest in the borough. Surely something the council would want to avoid ? If vulnerable people or someone who is ill for a week and needs help from friends or family they may not be able to afford the frighteningly large increase. Please please reconsider.

Unless you are reducing the price of the Hourly passes removing Daily Passes doesn't feel very fair. We often have family coming to visit, and all this is doing is making this cost more than double the cost!

I live in a poor ward close to the mall, which has controlled hours of 8am-10pm. To remove daily permits would make it prohibitively expensive for family from out of London to stay over. This proposal adversely affects the poorest in the borough and is a terrible proposal.

Has Haringey at all undertook a survey to see how many residents have unpaid carers. Many people care for their elderly as opposed to putting them in a home. Have you checked with your adults social services team as to how many residents have their own families care for them in Haringey To remove

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the daily permits and expect families to pay extortionate amounts in hourly per.its to care for their loved ones to me goes against all the principles of a council to protect disabled vulnerable people. Families may not be in a position to afford this.

We don't own a car. We are fortunate that our relatives from out of London are mostly able to use public transport when visiting us. However I would like to strongly object to the proposal to stop issuing day visitor permits and move to hourly permits. I'm sure many other residents will be quoting the sums for you so I won't repeat them here, but the cost of individual hourly permits for a whole day (when our restricted hours are so long) is an incredible amount more than a daily permit. For us the most typical use would be for my mum, who doesn't live in London, to stay with us for several days. If she needs to use the car to bring things she can't carry on the train, or to help us out with something, she needs to park on the street for the full duration of the time she's here. It's not right that having my mum to visit should cost so much in parking. There may or may not be an issue with misuse of daily permits (an FOI request to the council revealed 'anecdotal evidence'), but if this issue exists, it is for the council to solve innovatively, not by drastically increasing the cost to residents who are using the system properly. The most important point here though is the incredible cost disparity across the borough. You will have seen the map of social depravation and parking charges, it's incredible, it looks like something children should study in geography lessons. Everyone across the borough has someone they want to give visitor permits to. I personally can afford to pay extortionate parking charges to have my mum stay, but what about the people who can't? Why is it fair to make it so that people in the poorest areas have to decide whether they can afford to have visitors?

If I have building renovations taking place, I need to give the builders a daily visitor permit. The new proposal, with a cap, would mean that I could not facilitate builders renovating my home. Is Haringey strategy to prevent housing stock in the borough from being renovated? i do not have a car. The proposals would be onerous and seem to target those who do not drive but have visitors. Why is Haringey targeting people without cars?

These are essential for ensuring that tradespersons such as plumbers/electricians and visiting relatives can park legally and safely in the street with an appropriate not excessive payment. Please do not cancel the possibility of a daily visitor permit.

I am concerned that the removal of daily visitor permits will make it more expensive for when we have builders and other tradesmen as well as friends and relatives visiting for a few days.

While I understand the council's intent to ensure that permits are used correctly, I believe that removing daily permits entirely would create considerable inconvenience and challenges for residents and their visitors. Daily visitor permits provide crucial flexibility for residents, particularly when

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hosting family, friends, or service providers who need parking for extended periods. The proposal to limit visitors to hourly permits would not only be inconvenient but also burdensome, as it would require constant renewals throughout the day. This could be particularly challenging for residents who are unable to monitor the time closely due to work, health reasons, or other obligations. Additionally, hourly permits may disproportionately impact vulnerable residents, including the elderly, those with mobility difficulties, and those who depend on longer visits from carers or health professionals. The need to manage hourly permits could place unnecessary stress on these individuals and their visitors, particularly those providing essential care. If the misuse of daily permits is a concern, I respectfully suggest that the council consider alternative measures to address this issue without restricting residents' options. Measures such as stricter permit tracking or limiting the number of daily permits issued per household could help achieve the intended purpose while still allowing for the flexibility that daily permits provide.

Daily passes are needed for local people to allow us to have family over to care for kids and the sick. Their needed for trades people to help us maintain and improve our homes. It's frustrating that you want to remove the concept simply because a small number of people are abusing the system. Put better measures in place to stop those abusers, but don't cancel the right to park for local people. There are a lot of people in the borough who need care and support, those people will be the ones most affected by this change, and unable to financially cover the jump in costs.

1. This change would mean the cost to me for hosting my two children (who grew up up here) and grandchildre for an occasional family get-together, would increase from £10 to up to £30. 2. The same should i need a builder or carer in the future. 3. This doesn't apply to wealthier areas of Crouch End, Muswell Hill, etc. 4. It's based on assumptions about permit misuse (with no evidence cited) which could easily be stamped out with a little business application. All the data is there on exactly which houses bought what permits on what dates, why not go after these individuals? The practice would soon stop if you did.

I think, given that there are restrictions on parking, many residents find it useful to have the option of daily visitor parking permits for things such as building work or renovation to their property in which workers arrive by or need to use a car, or for any work involving tradesmen or women being there for a day or more, or for friends or relatives visiting by car. The purported reason given - that it would be intended to prevent the permits being used for other than their intended purpose - is so vague as not to make any sense at all. With hourly permits, would you have to return every hour to put a new one up? If so, that would create mayhem if you have a lot of people arriving in cars for a children's party, for example. Either way, it would be far less stressful to have a daily permit so it could be put on the car and then forgotten-about.

These are essential for those who rely on families for childcare or care or are having work done on their property to maintain it. Hourly parking unfairly

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penalises those who live in areas with long controlled parking hours (mostly the poorest parts of the borough). It would appear that this strategy is punishing the vast majority of residents who use the daily permits in the way that they are intended in order to stop a small minority abusing the system. Surely if this is the main concern alternative measures can be found?

This proposed change disadvantages those of us that have decided not to own a car but may occasionally need to borrow or hire one. This goes against the council policy of discouraging car use in favour of other forms of transport. A full day using hourly permits would cost £12, or more on match days, which is unreasonable. This is even more unreasonable when compared to the cost of a permit or even an additional car permit. It would be cheaper to get a permit for a full year than use a visitor permit for just 4 days. It would even be cheaper to get a permit for a 2nd car than use visitor permits for just 10 full days. Although this cross-over point would be a bit higher for higher polluting cars, it should not be the case that a person without a permit ends up paying more for such little use time. This is exacerbated by the excessive length of the CPZ in our area, nearby are areas that are restricted for just 2 hours a day which would be far more reasonable. There are lots of situations where it might be needed to have a permit for a few days rather than a few hours, such as a relative staying for a couple of weeks or having repairs done to the house. Repair work is expensive enough without adding potentially a hundred pounds just for permits for 8 days work. More extensive work that involved multiple people could add many hundreds to already expensive projects. The proposal seems to have not considered these common use requirements. The justification in the proposal is just Circumstantial evidence suggests daily visitor permits are open to being used for purposes other than intended... circumstantial evidence should not be a reason to implement such a large change in policy. If the council can not provide proper evidence it should conduct further research not disadvantage many residents on what may be entirely incorrect assumptions. If they are being abused then those who are abusing them should have their right to permits removed, not punishing everybody else doing the right thing.

If the reason is to stop use for other than the intended purpose - firstly what is the evidence that this is happening at a level that needs to be tackled, secondly what is the evidence that it's happening on every street, and thirdly how will this stop it? This is introducing significant extra expense to residents who rely on visitor parking for people who work in their homes in a care capacity or for doing work and repairs, as well as those having people to stay. It is also introducing inconvenience to have to judge the exact time a person is going to arrive and leave to avoid paying for extra time. It is discriminating against those of us with long hours of restrictions in place compared to those with one or 2 hours in the middle of the day. Why not level the playing field and make the whole borough pay for 10.5 hours a day if you want to raise more revenue instead of generating it from the unlucky areas?

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I have family members come and visit me and my wife and they have to use their cars to get here as they travel from quite far away, so if you do away with the visitors parking permits they will have nowhere to park, so on behalf of the residents please don't do away with visitor parking permits.

I have elderly parents that take enjoyment at coming over for the day, as they can park outside our house. If they thought I was having to pay per hours they would find this incredibly upsetting and would reduce them coming to see us. Having contractors round to have work done would be very hard to estimate the length of time they would require - thus pushing the cost of daily parking up to exorbitant unacceptable rate.

Please do not remove this option from residents. If you do, it is a very deliberate attempt to either stop our families visiting our homes or a not very subtle attempt to make us pay double. If my mother wants to visit for the full day on a Friday to see here granddaughter, and stay as a guest overnight on occasion, you are saying rather than currently paying $2 \times \pounds 5$ (already a large % increase on previous daily price), that she must now pay $\pounds 26!$ ($10x\pounds 1.20 + 12x\pounds 1.20$) I am generally supportive of most of the other proportionate measure but there must be another way to solve the issue your are trying to here, as this suggestion is completely unfair and will end up forcing many families to spend less time together.

This would be very expensive for residents having family and friends to stay or having work done on their property etc.. It is bad enough no longer having 2-hour permits. As everything is now done electronically it would be very easy to track any misuse over a period of time.

All of the proposals, except one seem very sensible to us and we support them as we think they will improve parking. The one where we would like to make a comment is in relation to the removal of daily visitor permits - these make a lot of sense when we have friends and family visiting for a day or two and are much more efficient than having to buy hourly permits. Therefore we would prefer to retain this facility.

I have family visit me, whom live outside London and stay over a few day's. In addition, as and when I have work done to my house, then the cost of hourly permit would become truly expensive. I am very dubious about the consultation, as I feel Haringey just want to tick boxes and do what they want irrespective of so called consultation!

If there is any evidence of abuse of parking permits, then this should be investigated and prosecuted appropriately. It should not result in significant financial punishment of other residents. Having my parents visit for a for two days would cost £26.40, vs the current £10, an utterly appalling scenario and a vile idea. Should we require childcare then the cost would increase exponentially. We are currently having our kitchen improved, and the cost of parking alone would increase the overall cost of our project by another £160. We want people in this area to be improving their homes, and this places another completely unnecessary financial burden on doing so. There is then

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the actual system issue. Currently booking consecutive days for visitors is easy. Having to book 22 hours slots does not automatically do two days, it does 22 consecutive hours even if these hours are outside of the restrictions. This is in addition to the 30 minutes of redundant permits per day the council would essentially be stealing.

Disagree, if you can buy an hour you can buy a day. A pointless mechanism designed to fix a problem not within the

My mum is an elderly resident and if she has friends to visit she uses the daily permits as they are more economical. If you get rid of these will you be reducing the price of the hourly permits? If this situation not the case then you are impacting vulnerable groups negatively.

In particular the visitor permit: £5 per day is already enough. Why look at hourly? This is just a rip off.

1. Objection to the discontinuation of daily visitor permits, on the basis that this is an unjustified increase of costs of residents without any material benefit gains towards the parking strategy. A. Only 'circumstantial evidence' was loosely cited as the reasoning behind this in the Council minutes, with no source, size or impact provided in any documentation. Therefore insufficient evidence has been provided to justify the change. B. The removal of daily permits will make no material difference to the ability of any potential misuse that is cited (without evidence), given the continued availability of hourly permits which could be simply purchased instead. C. The cost of hourly permits means that a full day of hourly permits costs more than a daily permit. Therefore the removal of daily permits will only increase the charge to residents, and as noted above with no material difference to any potential misuse given the continued availability of hourly permits under the same purchase criteria D. I therefore cannot see any benefit to this change other than to raise more funds for the Council. The Council itself states that 'The Council must not set charges for vehicles left in parking places for the purpose of raising revenue.' I submit that given there is no benefit from removing daily permits other than to simply raise revenue, the council is therefore contravening this statement. E. Given parking zone restrictions apply for more hours in the east of the borough than west, this will have a disporportionate financial impact on residents in the east of the borough, who are more likely to be from lower socio-economic groups and be from other disadvantaged groups. This policy therefore discriminates unfairly and unjustly those disadvantaged groups.

I am totally opposed to this change. I visit my grandchildren and go from one part of Haringey to another which is virtually impossible by public transport. Improve public transport first!

If, as stated, the purpose of the proposal is to stop notional re-selling of permits by residents to commuters and event-goers I fail to see how these changes will make a difference. I can see these changes will affect whoever is reselling permits in two ways: 1. Sellers have to do more administration for

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each customer by completing multiple 1-hour permits instead of just one daily permit 2. Sellers have to charge more (>£5 today rising to >£12) to customers. I don't see how the above will become big enough barriers to those in the resale industry. I think they will continue. If, as suspected (but not published), an objective is for Haringey Council to increase income from parking charges, may I suggest a simple increase the cost of a daily permit from £5 to £10, £15 - whatever is palatable to you. The administrative burden of buying and individually completing 15 one-hour parking permits when my parents drive from outside London to stay overnight to visit their grandchild every fortnight seems completely unnecessary. I understand the objective may be for people like them to use public transport, but unless the parking charge was >£100 it's unlikely that would ever be a cost-effective option. I am happy to pay more to park, so please either improve the website so residents can get it done quickly, or keep the daily permits.

As someone with elderly family who come and stay with me on a regular bases and also as a parent who needs to access grandparents for childcare I use the daily permits frequently. Quite often people stay for a number of days and I do not wish to incur the extra cost and time to keep adding hourly permits for longer term visitors. The Daily permits are also hugely useful for tradespeople who only need a few days cover (e.g. someone who had to paint my house recently) and someone who came to replace my boiler

This is a very stupid idea and will mean it makes it harder for friends and family to visits.

Whilst I generally support the parking policy changes, I want to object to the removal of daily parking permits. This will increase costs for visitors and tradespeople and disproportionately affect those on lower incomes in the borough.

The daily visitor permits, as well as the one-hour visitor permits, are incredibly useful to us residents. If the daily visitor parking permits are to be removed, then should we have friends / family visiting for the day, the hourly visitor permits would cost substantially more, as I'm sure you're aware. You say the reason for this proposal is because there is evidence to suggest daily visitor permits are open to being used for purposes other than intended i.e. by commuters using permits to park for the day, or by those residing in properties without entitlement to resident permits. If this is true, then this is clearly the minority of cases, and the majority of people using daily visitor parking permits are residents who are absolutely not abusing the system and are using the permits as intended. It is clear that Haringey Council are merely trying to find ways to charge residents a huge amount more for visitor parking and I find that despicable. Removing the daily visitor parking permits, or limiting the number per household, would be penalising residents and would be completely unjust. I, along with many of my neighbours who I have spoken to, am absolutely appalled by Haringey Council's suggestion to do so and by its disregard and lack of empathy for its residents in this matter.

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I would like to understand why you think it's acceptable to limit the amount of time visitors can spend with a resident and what about Tradespeople? Haringey council trying to control its residents.

I consider the proposed change to be unreasonable and unlikely to achieve the declared purpose. It is discriminatory to those living in areas where the parking restrictions are in place for the majority of the day - (inducing an extraordinary rise in costs from £5 to £13.20 per day) and I cannot be convinced that this will serve its declared purpose to deter people from selling visitors permits commercially - presumably the cost to the purchaser would simply rise accordingly. This will also disproportionately impact families, for example, where relatives are providing regular care to children, elderly parents and the unwell, and there does not appear to be any provision for tradesmen or significant works requiring vehicle attendance.

This seems like an ill thought out policy change, providing daily parking permits provides an option for people who are working on a house etc, the proposal to change this by using multiple hourly permits would be an exorbitant price increase. This comes off the back of a large rise in the price of hourly and daily parking permits. This proposed change would be hitting people in the pockets in a way which won't see a drastic change in the numbers of cars parked (as often these vehicles depart at the end of the day, thus opening the parking spaces up for those returning from work). I would argue this is yet another attempt to take more money from council tax paying residents.

I think it is unfair to take away daily parking permits for visitors of residents. If visitors are staying overnight this will create greater chance for permits to missed by accident. Residents and their visitors shouldn't be penalised for the area they live in and this just makes it more difficult.

I have needed to use these when visiting friends ,in some cases who were unwell. To have the worry of watching the clock instead of spending whatever time we wished would have been stressful. It seems disproportionate to impose further restrictions on social visiting to residents in their own homes. Use of such permits for 'other uses ' is mentioned as justification without any further detail of what that actually means. Any 'misuse' would have to be a high proportion of permits granted to justify the stress and inconvenience caused to residents welcoming visitors to their homes. If indeed it could be shown that this type of permit is being widely used for other purposes it would indicate that there might be a need to look at that and make some adjustments.

The ridiculously high increase in parking charges is set to be imposed on only the poorest half of the borough. The LTN only impacts the same half. The two halves of the borough are treated differently, with the only reason being the less affluent side has less of a voice so higher charges and restrictions are imposed. I would now need to pay £13.20 a day for my mum (who lives in Wembley and drives as there are no direct transport routes) to come and

Reason for objection / comment

look after my children so I can work. This increase is far too high for me to afford it. Yet, I have no other option. My elderly mum can't get the bus of public transport to mine, and a taxi is too expensive. She can't possibly walk or ride a bike. The removal of daily visitor permits discriminates against the elderly and families with young children.

These are required for our visitors but also for tradespeople many of whom will be small local businesses. It is surely not beyond the abilities of the department to identify unusual patterns of purchasing and use of day passes and suspend day passes for these accounts only. This solution punishes the majority for the suspected crimes of a minority.

I object to the proposed change to resident permits because the rationale for the change has not been clearly explained. The stated rationale says that this is to stop permit misuse. I don't understand why hourly permits are less open to misuse than daily permits? If the only reason is price then be clear on that and keep the daily permits but charging more. Even better would be to try and stop misuse in a way (e.g. capping usage) that doesn't penalize people who are using the permits appropriately.

I want to express my opposition to the proposal of removing the daily visitor permits. Not only will it make it more expense for those of us who have genuine day visitors but it will not achieve the intended purpose (to prevent permits being used for other than their intended use). Those wanting to abuse the system will continue to do so with the hourly permits.

I have used daily permits previously for visitors (previously paper and now online) and have found it to be a cost effective way of paying for parking for friends/family and tradespeople. i also use the hourly option when it is relevant, but the majority of my visitors come for the whole day and this will become more expensive for me. I'm not sure I understand how moving to an hourly process would improve the issue of permits not being used for intended purpose.

I reject that change. Unless the 24hr charge is equal to the current daily permit cost.

This is an efficient and more cost effective means of registering by visitor parking for genuine visitors. I don't believe removing this type of permit serves any real benefit.

Living residents should not be restricted to costly hourly visitor permit instead of the daily one off cheaper fee if visited by family members, friends or staying over for leisure or emergency purpose

It's not needed and will be painful for organising trade people to attend my home, or having visitors visiting and will just end up being insanely costly and cumbersome to me.

I think getting rid of daily's will affect a lot of people. Residents have family who live far that want to visit for the say, also some people have carers or workers.

Reason for objection / comment

The idea is clearly a money making scam for Haringey council and I find it disgusting that you would consider doing this to residents in an area with so many low income families such as ours. I have a young child and I have family visiting to help me care for her and the additional cost of using hourly permits is not affordable for me. I think it's a terrible decision and clearly a money making scheme for the council. I 100% object to this, please keep the daily visitor vouchers.

The reason being - for example - a few months ago I had some building work done. It was so much easier paying & activating a daily permit for the builders - rather than having to activate hourly permits. The latter would have been a long - cumbersome process having to go online several times during the day - with a strong possibility that I or they may forget - consequently landing them with a PCN - that I would have to pay. It would be too stressful for me being a disabled person.

I strongly disagree with the removal of the option of daily permits-I use them for when trades people are working on my house and also for when friends or family stay and park their car in the road...to keep adding an hourly permit is not pragmatic if I am away or busy with work and I think this is unfair and will it be more expensive? I think this could lead to mistakes and forgetting and then parking charges to friends and family? What if plans change-the daily parking permit works well and I cannot understand why you would change it? This seems punitive and unnecessary and will definitely lead to errors and parking tickets which is not fair or just. I want this to be stopped and thought through.

It would be hugely cumbersome to move to hour passes for having family members or tradespeople at our homes. We should have more parking pass options, not less and I would request we change the options to be able to access one hour, three hour and all day passes.

We are home owners and are constantly having remedial and new building work done to our houses. It costs a huge amount of money to pay for the parking of any labourers, even with the daily visitor parking, so to remove this and offer only hourly parking would be catastrophic and prohibitively expensive for anyone having work done, especially an extension which can often take months.

This is problematic as most contractors and service providers have no way to park in Haringey other than to use daily visitor parking permits. This will further hinder the ability to do business in Haringey

Stopping visiting permits and only issuing hourly permits means your visitors will be on a timer and you will end up playing more in the long run especially if your restriction is up until 10pm It feels too much, a way for haringey to rip off their residents even more.

Removal of day-long visitor permits would have a negative effect on our family. We use them for those who have childcare responsibilities for our children. Charging by the hour would increase costs unreasonably.

Reason for objection / comment

I appose and object strongly to the parking changes Haringey wish to enforce taking away the daily permits for residents visitors is a very costly thing for all increasing permit prices that have doubled over the years the proposals are unfair for a majority of residents and I think this is unfair and costly on what is a very costly borough to live in the roads are appauling traffic is in some areas gridlocked access roads not being able to be used as penalty notices are given but the big question is for what ?

Objection to / comment on consultation process / evidence

Reason for objection / comment

I believe that the way in which Haringey first sought to introduce these changes was undemocratic and discriminatory. It might appear that there was an intention to let it slip through unnoticed by residents and without true consultation. There has been no wide door to door advice to residents, those who are not computer literate may not have been properly informed of the changes nor understand the implications. The document published online is complex, not easy to absorb and process. The shifting time frame allowing extra time for submitting views supports that many stakeholders have felt the Ouch factor.

Equity Concerns: The new policy will disproportionately impact residents in Haringey's eastern areas, where parking restrictions are generally longer. These communities, already facing greater socio-economic challenges, will experience higher cumulative costs compared to more affluent areas with shorter parking restrictions. This disparity was not adequately addressed in the council's Equality Impact Assessment.

I would like to add my objection to the 100s of residents who are VERY opposed to your proposal to get rid of daily parking permits for residents. Why?

1. The idea affects people in the poorer parts of the borough. You do not mention any Equality Impact Assessment.

2. You give no evidence of daily permit misuse!!!

3. You have not followed your own policy process.

4. You ignore the 2nd principle of Gunning. No sufficient reasons given.

5. You set a dangerous precedent & amp; are not being transparent & amp; so you damage confidence in the council in our eyes.

Please drop this extremely flawed idea.

1. Inaccessibility of Consultation Documents: The consultation documents are lengthy, jargon-filled, and difficult for the average resident to understand. The shift from user-friendly platforms to email submissions increases the risk of errors and disregarded feedback. Why was this manual approach chosen over more reliable methods like survey forms?

2. Confusing Deadlines: Haringey's Facebook page mentions a 13th November deadline, while an email and council webpage state 20th November. With residents being given less than a month to respond, this

Objection to / comment on consultation process / evidence

Reason for objection / comment

inconsistency adds confusion. What is the correct deadline, and who decided on this short timeframe?

3. Co-Design Process: The council claims that the parking strategy was codesigned with the community, yet many residents were unaware of this. How were residents selected for this process, and what was the demographic and geographical representation?

4. Impartiality of Feedback Consideration: There is little trust in the impartiality of the council's decision-making, given that they are both the proposer and decider of these changes. Who will be making these decisions, and what measures ensure impartiality?

Inequity: This policy change has significant financial implications for residents, and will only affect the poorest areas of the borough. The analysis below clearly illustrates the huge discrepancy in daily parking charges that this policy will introduce. The darker blue the ward, the more deprived, according to the Haringey 2024 state of the borough report. You can see from this graphic that this cabinet-endorsed decision will disproportionately impact the poorer parts of the borough. Full analysis is attached. It is of great concern that the Equality Impact Assessment did not identify this issue, and this illustrates that the cabinet was not provided with sufficient information to make an informed decision.

Lack of Evidence: The decision was made based upon 'circumstantial evidence' of daily parking permit misuse. This evidence was not presented to the Cabinet. Upon receipt of a Freedom of information request, Haringey Council have admitted that that have no record of this problem: "The Cabinet report stated circumstantial evidence for the proposal, and this is in the form of anecdotal information which has been brought forward from a range of sources over a number of years. While various sections of the council may hold information, it is not held in a format, nor was it intended to be documented, in manner to be used to supply for such a response'. You can see the full response here. Why is a decision with such meaningful, borough wide, impact being taken to consultation to solve a problem that has not been robustly documented or analysed by the Council? Given that there is no understanding of the scope or nature of permit misuse, how can an assessment of alternative options have been conducted? This is a requirement of a policy change, and no details of alternative options considered were presented in the policy package. Again, this illustrates that the Cabinet was not provided with sufficient information to make an informed decision.

Failure to follow due process: The Parking Schemes – Resident Engagement Policy provides (quote) " a framework for future residential parking scheme design and review". The Framework requires the following steps: 1. Prepublic engagement 2. Public Engagement (co-design stage) 3. Statutory Consultation 4. Decision. This policy process has not been followed as part 2 Public Engagement (co-design) did not occur. An online Parking Policy Review consultation took place. This did not meet the criteria of "Public Engagement" because: * Letters and public engagement packs were not

Reason for objection / comment

provided to all registered properties within the defined area * No street notices were erected * Ward councillors were not be notified of the outcome and the proposed recommendations

Furthermore, the policy states that "The Council will need a minimum response rate of 10% to the public engagement, before any decision can be considered." Only 100 individuals responded to the online consultation. This does not represent 10% of the adult population affected by this decision

1. Lack of evidence leading to an unreasonable and disproportionate impact The proposal to scrap daily visitor permits was made in absence of any robust or reasonable evidence base.

The decision was made based upon 'circumstantial evidence' of daily parking permit misuse. This evidence was not presented to the Cabinet.

Upon receipt of a Freedom of information request, Haringey Council have admitted that that have no record of this problem: "The Cabinet report stated circumstantial evidence for the proposal, and this is in the form of anecdotal information which has been brought forward from a range of sources over a number of years. While various sections of the council may hold information, it is not held in a format, nor was it intended to be documented, in manner to be used to supply for such a response".

The policy is unreasonable and will have a negative impact on the local community and local residents. Furthermore, the Council is not following its own best practice for public engagement and consultation. There has been insufficient engagement with the local community – the survey that was mentioned was poorly advertised and not known about locally in my local community.

This proposal seems to be based on 'anecdotal' evidence of permit abuse, however the council doesn't appear to have any evidence to back it up. It would appear to be very bad practice for the council base a policy on hearsay, surely it would be necessary to investigate such claims, putting forward a borough-wide consultation to determine if such a problem really exists, and consider a range of measures, potentially trialling them, to deal with any issues.

I object to the removal of the daily parking ticket, ref 2024 - T35. I think it is really troubling that I only found out about the Council's plans to remove the daily parking ticket from the press. I have seen no publicity from or information to residents explaining the policy, proposals and how to have a say or object.

I also object to the fact that the consultation was conducted online only, so I only became aware of it today. Please re-run the consultation and send out full information by post.

The decision to remove permits was taken at cabinet meeting on 16th July. Although councillors and council officers repeatedly say there will be a legal consultation this proposal is not going back to cabinet for agreement. Consultation that did take place before cabinet meeting was certainly not broad enough. 100 participants. Council stated there was misuse of daily

Objection to / comment on consultation process / evidence

Reason for objection / comment

parking permits yet from freedom of information request could not produce evidence of misuse. The parking system is computerised. The council should hold to account those potential residents misusing rather than punishing all residents. Council has not followed its own procedures in producing these proposals.

the secrecy in which this consultation has been carried out quite obviously negates any conclusions which may be drawn from it. how many thousands more residents are totally unaware of the secret of this consultation?

Furthermore, you have not sent the consultation by post. How would I be expected to comment on this if I am not aware. I don't think this is a fair consultation

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Appendix B: Proposed parking permits and associated fees

1. Residential Parking Permits

Fuel type/CO ₂ Emission Band (CO ₂ g/km)	Current Charge Annual	New Charge – Small Vehicles (<4m) Annual	New Charge – Medium Vehicles (4m- 4.49m): 5% Surcharge Annual	New Charge – Large Vehicles (4.5m+): 10% Surcharge Annual	Current Charge 6- Monthly	New Charge – Small Vehicles (<4m) 6-Monthly	New Charge – Medium Vehicles (4m- 4.49m): 5% Surcharge 6-Monthly	New Charge – Large Vehicles (4.5m+): 10% Surcharge 6-Monthly	Permit Surcharge for subsequent vehicles per Household	Diesel Vehicle Surcharge
Battery Electric Vehicle (BEV)	£45	£45	£47.25	£49.50	£22.50	£22.50	£23.63	£24.75	Annual surcharge:	£100 - annual diesel
Up to 100	£45	£55	£57.75	£60.50	£22.50	£27.50	£28.88	£30.25	2 nd permit - £65	surcharge on
101 -110	£55	£70	£73.50	£77	£27.50	£35	£36.75	£38.50	3 rd permit - £130 4 th permit – £195	top of permit
111 - 120	£70	£100	£105	£110	£35	£50	£52.50	£55	5^{th} + permit - £195	charge
121 - 130	£100	£130	£136.50	£143	£50	£65	£68.25	£71.50		£50 - 6-month
131 -140	£130	£160	£168	£176	£65	£80	£84	£88	<u>6-month</u>	diesel
141 -150	£160	£190	£199.50	£209	£80	£95	£99.75	£104.50	surcharge:	surcharge on
151 -165	£190	£230	£241.50	£253	£95	£115	£120.75	£126.50	2 nd pormit 622 50	top of permit
166 -175	£230	£270	£283.50	£297	£115	£135	£141.75	£148.50	2 nd permit - £32.50 charge 3 rd permit - £65 4 th permit – £97.50	charge ມັ ເວັ ເບ
176 - 185	£270	£310	£325.50	£341	£135	£155	£162.75	£170.50		je
186- 200	£310	£350	£367.50	£385	£155	£175	£183.75	£192.50	5 th + permit - £130	8
201-225	£350	£390	£409.50	£429	£175	£195	£204.75	£214.50		
226-255	£390	£430	£451.50	£473	£195	£215	£225.75	£236.50		
over 255	£430	£470	£493.50	£517	£215	£235	£246.75	£258.50	_	
Vehicles registe						•	•	-	_	
Engine Size	Current Charge Annual	New Charge – Small Vehicles (<4m) Annual	New Charge – Medium Vehicles (4m- 4.49m): 5% Surcharge Annual	New Charge – Large Vehicles (4.5m+): 10% Surcharge Annual	Current Charge 6- Monthly	New Charge – Small Vehicles (<4m) 6-Monthly	New Charge – Medium Vehicles (4m- 4.49m): 5% Surcharge 6-Monthly	New Charge – Large Vehicles (4.5m+): 10% Surcharge 6-Monthly		
1549cc or less	£110	£110	£115.50	£121.00	£55	£55.00	£57.75	£60.50		
1550cc to 3000cc	£263	£263	£276.15	£289.30	£131.50	£131.50	£138.08	£144.65		
3001cc and above	£430	£430	£451.50	£473.00	£215	£215.00	£225.75	£236.50		

2. Business CPZ Permits

CO ₂ Emission	Current	New	New	New	Permit Surcharge for	Diesel Vehicle
Band (CO ₂ g/km)	Charge	Charge – Small Vehicles (<4m)	Charge – Medium Vehicles (4m- 4.49m): 5% Surcharge Annual	Charge – Large Vehicles (4.5m+): 10% Surcharge	subsequent vehicles per Address	Surcharge
Battery Electric	£150	£150	£157.50	£165		£100 - annual diesel
Battery Electric Vehicle (BEV)	£150	£150	£157.50	£105	Annual surcharge:	surcharge on top of
					2 nd permit - £65	permit charge
Up to 100	£150	£200	£210	£220	3 rd permit - £130	permit charge
101 -110	£200	£250	£262.50	£275	4^{th} permit – £195	
111 – 120	£250	£300	£315	£330	5 th + permit - £260	
121 – 130	£300	£350	£367.50	£385		
131 -140	£350	£400	£420	£440		
141 -150	£400	£450	£472.50	£495		
151 -165	£450	£500	£525	£550		
166 -175	£500	£550	£577.50	£605		
176 – 185	£550	£600	£630	£660		
186- 200	£600	£650	£682	£715		
201-225	£650	£700	£735	£770		
226-255	£700	£750	£787.50	£825		
over 255	£750	£800	£840	£880		
Vehicles registered		rch 2001				
Engine size	Current	New	New	New		
	Charge	Charge –	Charge –	Charge –		
		Small	Medium	Large		
		Vehicles	Vehicles	Vehicles		
		(<4m)	(4m-	(4.5m+):		
			4.49m): 5%	10%		
			Surcharge	Surcharge		
	Annual	Annual	Annual	Annual		
1549cc or less	£346	£346	£363.30	£380.60	1	
1550cc to 3000cc	£484	£484	£508.20	£532.40	1	
3001cc and above	£750	£750	£787.50	£825.00	1	
Where a CO ₂ emiss	sion cannot be	demonstrate	d the highest	charge will ap	ply.	·

3. Borough Wide and Utility Permits

CO ₂ Emission	Current	New	New	New	Permit Surcharge for	Diesel Vehicle
Band (CO₂ g/km)	Charge	Charge – Small Vehicles (<4m)	Charge – Medium Vehicles (4m- 4.49m): 5% Surcharge	Charge – Large Vehicles (4.5m+): 10% Surcharge	subsequent vehicles per Address	Surcharge
	Annual	Annual	Annual	Annual		
Battery Electric	£150	£150	£157.50	£165	Annual surcharge:	£100 - annual diesel
Vehicle (BEV)						surcharge on top of
Up to 100	£150	£200	£210	£220	2 nd permit - £65	permit charge
101 -110	£200	£250	£262.50	£275	3 rd permit - £130	
111 – 120	£250	£300	£315	£330	4 th permit – £195	
121 – 130	£300	£350	£367.50	£385	5 th + permit - £260	
131 -140	£350	£400	£420	£440		
141 -150	£400	£450	£472.50	£495		
151 -165	£450	£500	£525	£550		
166 -175	£500	£550	£577.50	£605		
176 – 185	£550	£600	£630	£660		
186- 200	£600	£650	£682	£715		
201-225	£650	£700	£735	£770		
226-255	£700	£750	£787.50	£825		
over 255	£750	£800	£840	£880		
Vehicles registere						
Engine size	Current	New	New	New		
	Charge	Charge –	Charge –	Charge –		
		Small Vehicles	Medium	Large Vehicles		
		(<4m)	Vehicles (4m-	(4.5m+):		
		(<4111)	4.49m): 5%	10%		
			Surcharge	Surcharge		
			o al ollar go	e al estal ge		
	Annual	Annual	Annual	Annual		
1549cc or less	£651	£651	£683.55	£716.10		
1550cc to 3000cc	£956	£956	£1,003.80	£1,051.60		
3001cc and above	£1320	£1320	£1,386	£1,452		
Where a CO ₂ emis	sion cannot be	demonstrate	d the highest	charge will ap	oply.	

4. Essential Service All Zones Vehicle Specific Permits

CO ₂ Emission	Current	New	New	New	Diesel Vehicle
Band	Charge	Charge –	Charge –	Charge –	Surcharge
(CO ₂ g/km)		Small	Medium	Large	
		Vehicles	Vehicles	Vehicles	
		(<4m)	(4m-	(4.5m+):	
			4.49m): 5%	10%	
			Surcharge	Surcharge	
	Annual	Annual	Annual	Annual	
Battery Electric	£182	£182	£191.10	£200.20	£80 - annual diesel
Vehicle (BEV)					surcharge on top of
Up to 100	£182	£228	£239.40	£250.80	permit charge
101 -110	£228	£273	£286.65	£300.30	
111 – 120	£273	£318	£333.90	£349.80	
121 – 130	£318	£364	£382.20	£400.40	
131 -140	£364	£409	£429.45	£449.90	
141 -150	£409	£569	£597.45	£625.90	
151 -165	£569	£614	£644.70	£675.40	
166 -175	£614	£659	£691.95	£724.90	
176 – 185	£659	£704	£739.20	£774.40	
186-200	£704	£750	£787.50	£825	
201-225	£750	£795	£834.75	£874.50	
226-255	£795	£840	£882	£924	
over 255	£840	£885	£929.25	£973.50	
Vehicles registere					
Engine size	Current	New	New	New	
	Charge	Charge –	Charge –	Charge –	
		Small	Medium	Large	
		Vehicles	Vehicles	Vehicles	
		(<4m)	(4m-	(4.5m+):	
			4.49m): 5%	10%	
			Surcharge	Surcharge	
	Annual	Annual	Annual	Annual	
	7.111.000	,	7.11144	/	
1549cc or less	£372	£372	£390.60	£409.20	1
1550cc to 3000cc	£599	£599	£628.95	£658.90]
3001cc and	£764	£764	£802.20	£840.40	
above					
Where a CO ₂ emission cannot be demonstrated the highest charge will apply.					

5. Reduced (concessionary) ESP charges – Ministers of religion and foster carers

CO ₂ Emission	Current	New	New	New	Diesel Vehicle
Band	Charge	Charge –	Charge –	Charge –	Surcharge
$(CO_2 g/km)$	Charge	Small	Medium	Large	Surcharge
(CO2 g/KIII)		Vehicles	Vehicles	Vehicles	
		(<4m)	(4m-	(4.5m+):	
		((()))	4.49m): 5%	10%	
			Surcharge	Surcharge	
			Ū	C C	
	Annual	Annual	Annual	Annual	
Battery Electric	£34.10	£34.10	£35.81	£37.51	£80 - annual diesel
Vehicle (BEV)					surcharge on top of
Up to 100	£34.10	£45.10	£47.36	£49.61	permit charge
101 -110	£45.10	£56.10	£58.91	£61.71	
111 – 120	£56.10	£79.20	£83.16	£87.12	
121 – 130	£79.20	£102.30	£107.42	£112.53	
131 -140	£102.30	£124.30	£130.52	£136.73	
141 -150	£124.30	£170.50	£179.03	£187.55	
151 -165	£170.50	£192.50	£202.13	£211.75	
166 -175	£192.50	£215.60	£226.38	£237.16	
176 – 185	£215.60	£238.70	£250.64	£262.57	
186-200	£238.70	£260.70	£273.74	£286.77	
201-225	£260.70	£306.90	£322.25	£337.59	
226-255	£306.90	£328.90	£345.35	£361.79	
over 255	£328.90	£350.90	£368.45	£385.99	
Vehicles registere					
Engine size	Current	New	New	New	
	Charge	Charge –	Charge –	Charge –	
		Small	Medium	Large	
		Vehicles	Vehicles	Vehicles	
		(<4m)	(4m- 4.49m): 5%	(4.5m+): 10%	
			Surcharge	Surcharge	
			Surcharge	Surcharge	
	Annual	Annual	Annual	Annual	
1549cc or less	£90.20	£90.20	£94.71	£99.22	
1550cc to 3000cc	£215.60	£215.60	£226.38	£237.16	
3001cc and above	£328.90	£328.90	£345.35	£361.79	
Where a CO ₂ emission cannot be demonstrated the highest charge will apply.					

6. Visitor Vouchers

Visitor permit type	Current charge - 1 hour	Current charge - All day	New charge - 1 hour		Discount for over 65s and registered disabled
Business visitor permit	n/a	n/a	£3.63	n/a	n/a

7. Administration charges

	Current charge	New charge
Duplicate permits and amendment of permits (including change of address)	£15	£15
Rejected permit applications	n/a	£25



Equality Impact Assessment (EqIA)

The Equality Impact Assessment (EqIA) form is a template for analysing a policy or proposed decision for its potential effects on individuals with protected characteristics covered by the Equality Act 2010.

The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not

The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

1. Responsibility for the Equality Impact Assessment

Name of proposal:	Parking Strategy and
	Policy/Charges Review –
	feedback to statutory consultation
Service Area:	Parking Service
Officer Completing Assessment:	Simon Robertson
Equalities Advisor:	Diptasri Basu
Cabinet meeting date (if applicable):	N/A
Director/Assistant Director	Mark Stevens

2. Executive summary

The Cabinet Member signing report sets out the results of the statutory consultation regarding several proposed changes to parking policy and parking charges, and seeks approval to proceed with the implementation of a number of those proposals.

Parking policy and charges proposals:

- Concerns a range of parking users who may be impacted by proposed permit changes, across the controlled parking zones
- Policy proposals do not in general have a target population profile, except:



- Populations who have a disability a proposed new Non-Resident Blue Badge Holder Permit for non-Haringey residents who may work in the borough and would benefit from more flexible parking, with reduced potential for fraud
- Populations who may be more impacted by air pollution proposed permit charging measures to positively address air pollution through incentives for reduced car use / use of cars with lower emissions
- Results of analysis:
 - New Non-Resident Blue Badge Holder Permit for those who work in the borough
 - Positive offering a new permit for Blue Badge holders who work in the borough provides additional benefit to such parking users (in terms of flexibility in parking, and potential for reduced fraud), directly positively impacting those with disability and an older profile
 - Updated permit charging structure, to include a new EV charging tier & incremental subsequent permit surcharging for a range of permits:
 - Positive introducing incentives to further reduce vehicle emissions and thereby address air quality, will positively impact areas which with more prevalent social deprivation, where there is a correlation with poor air quality¹

3. Consultation and engagement

3a. How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff? Detail how your approach will facilitate the inclusion of protected groups likely to be impacted by the decision.

Parking policy and charges proposals form part of the Parking Strategy Delivery Plan, as approved at Cabinet in July 2024. The strategy and associated plan were developed in part following an engagement exercise in early 2024. The Parking Service uses engagement methods which facilitate the inclusion of protected groups where these are known to be impacted by a particular service or proposal. Parking has a particular importance for residents and other users who have mobility issues, where easy access to a home or other facility is key. The Parking Service users, with close engagement taking place early in policy development and service design.

These key contacts and groups were invited to engage with an informal consultation which took place in early 2024 concerning parking policy. In addition to the generic communications undertaken to engage people in the consultation, targeted communications were made to these groups to alert them to the consultation and

¹ Haringey Air Quality Action Plan 2019-2024



ensure they responded with concerns and interests in the consultation process. The online consultation allowed responses from individuals and representatives of groups, such as those representing service users with mobility requirements who may be particularly impacted by parking policy.

3b. Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

Parking policy consultation undertaken in early 2024 sought views on a wide range of parking policy issues, and response data can be taken forward and support various aspects of service development – supporting further objectives of the Parking Strategy where appropriate. Initial parking policy and permit charge updates subject to statutory consultation use aspects of the consultation feedback to support continuing and extending established permit charge principles – including emissions based charging, and surcharges for higher numbers of vehicles per household / address.

4. Data and Impact Analysis

Note: officers may want to complement their analysis with data from the State of the Borough and ward profiles, found here: <u>https://www.haringey.gov.uk/local-democracy/about-council/state-of-the-borough</u>.

Please consider how the proposed change will affect people with protected characteristics.

4a. Age Data Borough Profile²

- 54,422: 0-17 (21%)
- 71,660: 18-34 (27%)
- 63,930: 35-49 (24%)
- 46,516: 50-64 (18%)
- 27,706: 65+ (10%)

Target Population Profile

Parking policy proposals concern the borough as a whole or, in the case of parking permit proposals, for all controlled parking zone areas. Given this, there is no target population profile distinct from the borough profile. Furthermore, data is not held on parking users / parking permit holders' age, therefore detailed impact analysis is not possible.

² Census, 2021 – <u>Population and household estimates, England and Wales - Office for National</u> <u>Statistics (ons.gov.uk)</u>



Potential Impacts

- Updated permit charging structure, to include a new EV charging tier
 - Neutral strategic objectives are focus primarily on drivers, and therefore impact those 18+, however also detailed is the role of parking in supporting an effective transport network – which has a wider population
- New permit vehicle size surcharging for a range of permits
 - Neutral strategic objectives are focus primarily on drivers, and therefore impact those 18+, however also detailed is the role of parking in supporting an effective transport network – which has a wider population
- New Non-Resident Blue Badge Holder Permit for those who work in the borough
 - Positive offering a new permit for Blue Badge holders who work in the borough provides additional benefit to such parking users (in terms of flexibility in parking, and potential for reduced fraud), the impact of which may be weighted towards older profile
- Other proposals:
 - Neutral impact no data to suggest this group would be disproportionately impacted

4b. Disability

Data

Borough Profile

- Disabled under Equality Act 13.7%³
 - \circ Day to day activities limited a lot 6.1%
 - $\circ~$ Day to day activities limited a little 7.5%
- 7.5% of residents people diagnosed with depression⁴
- 1.7% of residents diagnosed with a severe mental illness⁵
- 0.4% of people in Haringey have a learning disability⁶

Target Population Profile

Parking policy proposals concern the borough as a whole or, in the case of parking permit proposals, for all controlled parking zone areas. Given this, there is no target population profile distinct from the borough profile – except where noted below with

³ Census, 2021 – Disability, England and Wales - Office for National Statistics (ons.gov.uk)

⁴ NHS Quality Outcomes Framework – <u>Prevalence of diagnosed depression among GP registered population age</u> 18+

⁵ NHS Quality Outcomes Framework – <u>Prevalence of diagnosed mental health diagnosis among GP registered</u> population age 18+

⁶ PHE Learning disability profiles – <u>https://fingertips.phe.org.uk/learning-</u> disabilities#page/0/gid/1938132702/pat/6/par/E12000007/ati/102/are/E09000014

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regard to Blue Badge holders. Furthermore, data is not held on parking users / parking permit holders' disability, therefore detailed impact analysis is not possible.

Blue Badge holders: specific measures concern Blue Badge holders, and while holding a Blue Badge is not a direct corollary for disability, holders will by definition have a condition which justifies prioritised parking access due to a health or mobility issue. Therefore, holders are considered a target population for the purposes of related policy proposals:

- Blue Badge holders^{7 8}
 - London average 3.1% of the population
 - Haringey 3.4% population)

Potential Impacts

- New Non-Resident Blue Badge Holder Permit for those who work in the borough
 - Positive offering a new permit for Blue Badge holders who work in the borough provides additional benefit to such parking users (in terms of flexibility in parking, and potential for reduced fraud), directly positively impacting those with disability
- Other proposals:
 - Neutral impact no data to suggest this group would be disproportionately impacted

4c. Gender Reassignment

Data

Borough Profile⁹

- Gender Identity different from sex registered at birth but no specific identity given – 0.5%
- Trans woman 0.1%
- Trans man 0.1%

Target Population Profile

Parking policy proposals concern the borough as a whole or, in the case of parking permit proposals, for all controlled parking zone areas. Given this, there is no target population profile distinct from the borough profile. Furthermore, data is not held on parking users / parking permit holders' gender profile, therefore detailed impact analysis is not possible.

Potential Impacts

• All proposals:

⁷ DfT Valid Blue Badges issued and held by category by region and local authority in England

⁸ ONS Estimates of the population for the UK

⁹ Census, 2021 – <u>Gender identity, England and Wales - Office for National Statistics (ons.gov.uk)</u>



 Neutral impact – no data to suggest this group would be disproportionately impacted

4d. Marriage and Civil Partnership

Note: Only the first part of the equality duty ("*Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act*") applies to this protected characteristic.

Data

Borough Profile ¹⁰

- Divorced or formerly in a same-sex civil partnership which is now legally dissolved: (9.9%)
- Married or registered civil partnership: (35.8%)
- Separated (but still legally married or still legally in a same-sex civil partnership): (2.9%%)
- Single (never married or never registered a same-sex civil partnership): (45.3%)
- Widowed or surviving partner from a same-sex civil partnership: (6.1%)

Target Population Profile

Parking policy proposals concern the borough as a whole or, in the case of parking permit proposals, for all controlled parking zone areas. Given this, there is no target population profile distinct from the borough profile. Furthermore, data is not held on parking users / parking permit holders' marital or civil partnership status, therefore detailed impact analysis is not possible.

Potential Impacts

- All proposals:
 - Neutral impact no data to suggest this group would be disproportionately impacted

4e. Pregnancy and Maternity

Note¹¹:

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

¹⁰ Census, 2021 – <u>Marriage and civil partnership status in England and Wales - Office for National Statistics</u> (ons.gov.uk)

¹¹ Equality and Human Rights Commission, 2022 – <u>Pregnancy and maternity discrimination</u>.



Data Borough Profile¹² Live Births in Haringey 2021: 3,376

Target Population Profile

Parking policy proposals concern the borough as a whole or, in the case of parking permit proposals, for all controlled parking zone areas. Given this, there is no target population profile distinct from the borough profile. Furthermore, data is not held on parking users / parking permit holders' pregnancy or maternity status, therefore detailed impact analysis is not possible.

Potential Impacts

- All proposals:
 - Neutral impact no data to suggest this group would be disproportionately impacted

4f. Race

In the Equality Act 2010, race can mean ethnic or national origins, which may or may not be the same as a person's current nationality.¹³

Data

Borough Profile ¹⁴

<u>Arab: 1.0%</u>

• Any other ethnic group: 8.7%

<u>Asian: 8.7%</u>

- Bangladeshi: 1.8%
- Chinese: 1.5%
- Indian: 2.2%
- Pakistani: 0.8%
- Other Asian: 2.4%

Black: 17.6%

- African: 9.4%
- Caribbean: 6.2%
- Other Black: 2.0%

<u>Mixed:</u> 7.0%

• White and Asian: 1.5%

¹² Births by Borough (ONS)

¹³ Race discrimination | Equality and Human Rights Commission (equalityhumanrights.com)

¹⁴ Census 2021 - Ethnic group, England and Wales - Office for National Statistics (ons.gov.uk)



- White and Black African:1.0%
- White and Black Caribbean: 2.0%
- Other Mixed: 2.5%

White: 57.0% in total

- English/Welsh/Scottish/Norther Irish/British: 31.9%
- Irish: 2.2%
- Gypsy or Irish Traveller: 0.1%
- Roma: 0.8%
- Other White: 22.1%

Target Population Profile

Parking policy proposals concern the borough as a whole or, in the case of parking permit proposals, for all controlled parking zone areas. Given this, there is no target population profile distinct from the borough profile. Furthermore, data is not held on parking users / parking permit holders' ethnicity, therefore detailed impact analysis is not possible.

Potential Impacts

- Updated permit charging structure, to include a new EV charging tier:
 - Positive introducing incentives to further reduce vehicle emissions and thereby address air quality, will positively impact areas with more prevalent social deprivation, where there is a correlation with poor air quality¹⁵ and where there is an alignment with higher proportion of nonwhite residents¹⁶
- Incremental subsequent permit surcharging for a range of permits
 - Positive introducing incentives to further reduce vehicle numbers and thereby address air quality through reduced emissions, will positively impact areas which with more prevalent social deprivation, where there is a correlation with poor air quality¹⁷ and where there is an alignment with higher proportion of non-white residents¹⁸
- Other proposals:
 - Neutral impact no data to suggest this group would be disproportionately impacted.

4g. Religion or belief Data

¹⁵ Haringey Air Quality Action Plan 2019-2024

¹⁶ Haringey Local Implementation Plan (LIP3)

¹⁷ Haringey Air Quality Action Plan 2019-2024

¹⁸ Haringey Local Implementation Plan (LIP3)

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Borough Profile 19

- Christian: 39%
- Buddhist: 0.9%
- Hindu:1.3%
- Jewish: 3.6%
- Muslim: 12.6%
- No religion: 31.6%
- Other religion: 2.3%
- Religion not stated: 8.0%
- Sikh: 0.3%

Target Population Profile

Parking policy proposals concern the borough as a whole or, in the case of parking permit proposals, for all controlled parking zone areas. Given this, there is no target population profile distinct from the borough profile. Furthermore, data is not held on parking users / parking permit holders' religions or beliefs, therefore detailed impact analysis is not possible.

Potential Impacts

- All proposals:
 - Unknown impact no data to suggest this group would be disproportionately impacted

4h. Sex Data Borough profile ²⁰

- Females: (51.8%)
- Males: (48.2%)

Target Population Profile

Parking policy proposals concern the borough as a whole or, in the case of parking permit proposals, for all controlled parking zone areas. Given this, there is no target population profile distinct from the borough profile. Furthermore, data is not held on parking users / parking permit holders' sex, therefore detailed impact analysis is not possible.

Potential Impacts

• All proposals:

¹⁹ Census, 2021 – <u>Religion, England and Wales - Office for National Statistics (ons.gov.uk)</u>

²⁰ Census 2021 – Gender identity: age and sex, England and Wales - Office for National Statistics (ons.gov.uk)



 Neutral impact – no data to suggest this group would be disproportionately impacted

4i. Sexual Orientation

Data

Borough profile ²¹

- Straight or heterosexual: 83.4%
- Gay or Lesbian: 2.7%
- Bisexual: 2.1%
- All other sexual orientations: 0.8%
- Not answered: 11.0%

Target Population Profile

Parking policy proposals concern the borough as a whole or, in the case of parking permit proposals, for all controlled parking zone areas. Given this, there is no target population profile distinct from the borough profile. Furthermore, data is not held on parking users / parking permit holders' sexual orientation, therefore detailed impact analysis is not possible.

Potential Impacts

- All proposals:
 - Neutral impact no data to suggest this group would be disproportionately impacted

4j. Socioeconomic Status Data

Borough profile

Income

- 6.9% of the population of Haringey were claiming unemployment benefit as of April 2023²²
- 19.6% of residents were claiming Universal Credit as of March 2023²³
- 29.3% of jobs in Haringey are paid below the London Living Wage²⁴

Area Deprivation

- ²¹ Census, 2021 <u>Sexual orientation, England and Wales Office for National Statistics (ons.gov.uk)</u>
- 22 ONS ONS Claimant Count
- ²³ DWP, StatXplore <u>Universal Credit statistics</u>, 29 April 2013 to 9 March 2023 GOV.UK (www.gov.uk)
- ²⁴ ONS <u>Annual Survey of Hours and Earnings (ASHE)</u> <u>Estimates of the number and proportion of employee</u> jobs with hourly pay below the living wage, by work geography, local authority and parliamentary constituency, UK, April 2017 and April 2018 - Office for National Statistics

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Haringey is the 4th most deprived in London as measured by the IMD score 2019. The most deprived LSOAs (Lower Super Output Areas, or small neighbourhood areas) are more heavily concentrated in the east of the borough, where more than half of the LSOAs fall into the 20% most deprived in the country.²⁵

Target Population Profile

Parking policy proposals concern the borough as a whole or, in the case of parking permit proposals, for all controlled parking zone areas. Given this, there is no target population profile distinct from the borough profile. Furthermore, data is not held on parking users / parking permit holders' socioeconomic status, therefore detailed impact analysis is not possible.

Potential Impacts

- Updated permit charging structure, to include a new EV charging tier:
 - Positive introducing incentives to further reduce vehicle emissions and thereby address air quality, will positively impact areas which with more prevalent social deprivation, where there is a correlation with poor air quality²⁶
- Incremental subsequent permit surcharging for a range of permits
 - Positive introducing incentives to further reduce vehicle numbers and thereby address air quality through reduced emissions, will positively impact areas which with more prevalent social deprivation, where there is a correlation with poor air quality²⁷
- Other proposals:
 - Unknown impact no data to suggest this group would be disproportionately impacted

5. Key Impacts Summary

5a. Outline the key findings of your data analysis.

The proposals are not going to result in any direct/indirect discrimination for any group that shares the relevant protected characteristics.

The proposals include measures to meet the specific parking needs of relevant protected groups such as pregnant women and young children, older / disabled people and those with long-term limiting illnesses/conditions.

It is not anticipated that the proposals will have an impact on good community relations.

5b. Intersectionality

²⁵ IMD 2019 – English indices of deprivation 2019 - GOV.UK (www.gov.uk)

²⁶ Haringey Air Quality Action Plan 2019-2024

²⁷ Haringey Air Quality Action Plan 2019-2024



As noted in section 4, data is not held on parking permit holders' protected characteristics, therefore detailed impact analysis – including that to consider intersectionality – is not possible for specific permit policy proposals.

In this context, parking policy proposals are expected to have an overall positive impact, focusing on particular groups for whom parking supports their mobility needs. This intersects in particular older age profiles and Blue Badge holders, who have health concerns or a disability profile.

5c. Data Gaps

Based on your data are there any relevant groups who have not yet been consulted or engaged? Please explain how you will address this

Parking has a particular importance for residents and other users who have mobility issues, where easy access to a home or other facility is key. The Parking Service has an established group of organisations and key contacts for such service users, with close engagement taking place early in policy development and service design. Parking policy consultation undertaken in early 2024 sought views on a wide range of parking policy issues, and these key contacts and groups were invited to engage with the consultation.

6. Overall impact of the policy for the Public Sector Equality Duty

The proposals are not going to result in any direct/indirect discrimination for any group that shares the relevant protected characteristics.

Parking policy proposals seek to advance positive impacts for identified groups: firstly, those of younger and older age profiles, and those in areas with higher social deprivation, where there is a correlation with or who suffer most from poor air quality; secondly, Blue Badge holders who will benefit from improved parking permit offers, with improved flexibility and reduced potential for reduced fraud; thirdly, in strategic objectives to deliver improved parking and enforcement for community and religious events across the borough.

It is not anticipated that the proposals will have an impact on good community relations.

7. Amendments and mitigations

7a. What changes, if any, do you plan to make to your proposal because of the Equality Impact Assessment?

No major change to the proposal: the EqIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote

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equality have been taken. Policy proposals seek to further promote existing established charging principles, supporting air quality improvements, which positively impact in particular older and younger age profiles.

7. Ongoing monitoring

Proposals for permit policy take forward established charging principles, and where appropriate equalities impact screening will be included as part of permitting fees and charges annual review.

Date of EqIA monitoring review:

In line with specific parking programmes of work.

8. Authorisation

EqIA approved by (Assistant Director/ Director)

Mark Stevens, Assistant Director of Resident Experience

Date

22nd of January 2025

9. Publication

Please ensure the completed EqIA is published in accordance with the Council's policy.

Please contact the Policy & Strategy Team for any feedback on the EQIA process.

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