

NOTICE OF MEETING

ENVIRONMENT AND COMMUNITY SAFETY SCRUTINY PANEL

Monday, 13th September, 2021, 6.30 pm – 40 Cumberland Road

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Members: Councillors Scott Emery, Julia Ogiehor, Kaushika Amin, Gideon Bull, Dana Carlin, Eldridge Culverwell and Preston Tabois

Co-optees/Non-Voting Members: Ian Sygrave (Haringey Association of Neighbourhood Watches)

Quorum: 3

1. FILMING AT MEETINGS

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2. APOLOGIES FOR ABSENCE

3. ITEMS OF URGENT BUSINESS

The Chair will consider the admission of any late items of urgent business (late items will be considered under the agenda item where they appear. New items will be dealt with as noted below).

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/PRESENTATIONS/QUESTIONS

To consider any requests received in accordance with Part 4, Section B, Paragraph 29 of the Council's Constitution.

6. MINUTES (PAGES 1 - 10)

To approve the minutes of the previous meeting on 28th June.

7. CABINET MEMBER Q&A - CABINET MEMBER FOR FOR CUSTOMER SERVICE, WELFARE AND THE PUBLIC REALM

Verbal update

8. WASTE, RECYCLING AND STREET CLEANSING PERFORMANCE (PAGES 11 - 30)

9. BRIEFING ON CHANGES TO WASTE LEGISLATION (PAGES 31 - 46)

10. IMPLEMENTATION OF RECOMMENDATIONS FROM THE REVIEW INTO BLUE BADGES AND SUPPORTING BETTER ACCESS TO PARKING FOR DISABLED PEOPLE (PAGES 47 - 98)

11. UPDATE ON PARKING TRANSFORMATION PROGRAMME. (PAGES 99 - 116)

12. WORK PROGRAMME UPDATE (PAGES 117 - 122)

13. NEW ITEMS OF URGENT BUSINESS

To consider any items admitted at item 3 above.

14. DATES OF FUTURE MEETINGS

11th November 2021

14th December 2021

3rd March 2022

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Fiona Alderman

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River Park House, 225 High Road, Wood Green, N22 8HQ

Friday, 03 September 2021

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MINUTES OF MEETING Environment and Community Safety Scrutiny Panel HELD ON Monday, 28th June, 2021, 6.30 pm

PRESENT:

**Councillors: Scott Emery, Dana Carlin, Eldridge Culverwell and
Preston Tabois**

ALSO ATTENDING: Ian Sygrave

76. FILMING AT MEETINGS

The Chair referred Members present to agenda Item 1 as shown on the agenda in respect of filming at this meeting, and Members noted the information contained therein'.

77. APOLOGIES FOR ABSENCE

Apologies for absence were noted from Cllr Ogiehor.

Cllrs Amin and Bull were present at the meeting virtually so their attendance cannot be formally recorded.

78. ITEMS OF URGENT BUSINESS

There were no items of urgent business.

79. DECLARATIONS OF INTEREST

None

80. DEPUTATIONS/PETITIONS/PRESENTATIONS/QUESTIONS

The Committee received a deputation on behalf of the Haringey Tree Protectors, around their concerns with the felling of trees on Parkland Walk and the need to maintain and enhance the existing tree coverage in the borough. The deputation was given by Giovanna Lozzi and Hannah Pescod. The key points of the deputation are summarised below:

- Parkland Walk was described as a 2.5 miles long former railway, which was home to rare species of flower and fauna, birds, owls, bats. A recent series of tree works was undertaken at this site, which had been deeply unpopular with some local residents, and had resulted in a petition and some local press coverage. It was commented that the works were the biggest intervention at this site since it became a wildlife corridor.

- The deputation party suggested that the planning, commissioning and site-management procedures of those works were beset by serious failings and were fundamentally flawed. It was contended that the Council appeared to take a 'chop down first, ask questions later', approach. A particular point of contention was the process of felling all trees within 5m of a bridge without ascertaining whether the trees were causing structural damage. Given that the world was facing a climate emergency, it was felt that trees needed to be maintained and protected.
- The Deputation party set out that they did not believe that the Parks service adhered adequately to the existing management plan for the site and should have adopted a more localised, nuanced and sensitive approach on a tree-by-tree basis.
- Concerns were raised as to why officers did not seem to be involved in the specification of works, or in carrying out a thorough survey and ecology report, which assessed both the ecological value and potential impact of the work on trees and other vegetation beforehand. Instead, the felling works were carried out by contractors without, it was suggested, any effective monitoring and site-management by the Council.
- A failure to manage the work effectively resulted in: The mistaken felling of a number of 100-year-old oak trees at St James' Bridge; trees being cut down beyond the 5 metre remit; the loss of an array of other local flora, such as bluebells and daffodils; and path widening taking place which exceeded the 5m limit.
- The deputation party requested that OSC look into the works further in order to learn from mistakes. It was also suggested that:
 - There should be enhanced tree protections for trees, with TPOs that are properly enforced.
 - Trees should form a central part of the new Biodiversity Action Plan and Haringey urgently needed a properly implemented and scrutinised trees strategy.
 - There should be well-financed, robust and valued trees department.
 - Trees should be considered as local heritage assets and be treated with equal respect as buildings.
 - Haringey should consult meaningfully with communities on large ecological projects. It was suggested that some residents, whose houses back onto the walk, had not been consulted with or informed the work was being planned.

The following points arose as part of the discussion of the deputation:

- a. The Committee sought clarification around whether deputation party had received any response from the Council on their concerns so far. In response, the Committee was advised that as they understood it, the Council was conducting a retrospective environmental impact analysis and that this was still being completed. The deputation party advised that they had also submitted an FOI request.
- b. The Cabinet Member, Cllr Hakata, thanked the deputation party for their deputation and advised that he was new in post and was unable to respond in detail on some of the historical points. Cllr Hakata advised that he acknowledged the need to learn lessons from this process as well as the need to engage with residents better. The Cabinet Member advised that he would

be developing a community engagement plan going forwards. The Cabinet Member also acknowledged the importance of biodiversity and the role of trees and woodland within that.

- c. The Head of Parks and Leisure advised that he was happy to share the environmental study with the deputation group and would also commit to meeting them in the next few weeks to discuss the findings of the study with them and learning points going forwards.
- d. The Chair set out her concerns with the potential that a number of trees were cut down in error and requested whether a tree audit could be carried out so that there was a record of exactly what was there. In response, officers advised that they needed to go through the environmental study point by point. Officers advised that during the works they adopted a different specification that may have been done in the past whereby all trees within 5 metres of the bridge were felled. The Head of Parks and Leisure advised that he was happy to commit to an individual assessment in future, whereby every tree would be marked up.
- e. The Committee raised concerns with a perceived lack of consultation and engagement around these works and queried why all adjacent residents were not consulted with. In response, officers set out that letters did go out to local residents and that notices were also placed at the appropriate places. Officers also consulted with the Friends of Parkland Walk in advance of the works. In response to a follow-up point, officers agreed to supply the Committee with the communications plan that was used for these works including names and addresses of those engaged with. **(Action: Simon Farrow)**.
- f. The Chair thanked the deputation party for their contribution and advised that this issue would be incorporated into the Panel's work programme going forwards.

81. MINUTES

RESOLVED

That the minutes of the meeting on 4th March were agreed as a correct record.

82. CABINET MEMBER QUESTIONS - CABINET MEMBER FOR ENVIRONMENT, TRANSPORT & CLIMATE EMERGENCY AND DEPUTY LEADER OF THE COUNCIL

The Cabinet Member for Environment, Transport and Climate Emergency, and the Deputy Leader of the Council, Cllr Hakata, attended OSC to give a verbal update on his portfolio, followed by a question and answer session. Rob Krzyszowski, Assistant Director, Planning, Building Standards & Sustainability was also present for this item, along with Maurice Richards, Transport Planning Team Leader and Simon Farrow. Cllr Hakata's portfolio update is summarised as follows:

- A key element of the portfolio was around strategic transport, which included the TfL Street Space programme which had replaced the traditional LIP funding during Covid for the maintenance and upkeep of the borough's roads.

- One of the key drivers behind the Street Space programme was dealing with the issue of a car-led recovery from Covid. TfL modelling suggested that a 3% increase in traffic could lead to a grid lock on London's roads.
- Haringey was committed to being zero carbon by 2041
- Respiratory illnesses were increasing and the primary cause of this was pollution.
- In light of wider health concerns, the Cabinet Member set out that he was committed to pushing people to walk and cycle more and that Haringey would be looking to disincentivise car usage, whilst incentivising cycling and walking.
- The Low Traffic Neighbourhoods (LTN) programme was continuing, and the Cabinet Member advised that he was committed to engaging with local residents on LTNs and ensuring they were part of the process. The first consultation would begin on 8th July, with the others to follow shortly afterwards. This consultation exercise would feed into the decision making process for implementation in the autumn and there would also be a rolling process of consultation to ensure that LTNs achieved their stated purpose.
- LTN's were identified as being just one part of a wider toolkit of interventions, with the examples of School Streets and the Walking and Cycling Action Plan (WCAP) noted. The Council had originally committed to undertake 15 school streets programmes over the 5 period of the WCAP. The Committee was advised that this would in fact be 26.
- The Cabinet Member committed to ensuring a depth of engagement with residents across all the schemes and that he would also be looking to roll out other traffic interventions across the borough as-and-when possible.

The following arose during the discussion of this agenda item:

- a. The Panel welcomed the Cabinet Member's goal of trying to win the hearts and minds of local residents around LTNs. The Committee queried when the WCAP would be in place, in response it was noted that the original implementation of summer 2021 would now likely be delayed slightly to Autumn 2021.
- b. The Panel queried whether in addition to the three proposed LTNs, there was also scope for rolling out smaller self-contained schemes. In response, the Cabinet Member acknowledged that a whole raft of traffic and transport interventions were needed and that a number of bids had been submitted. The Cabinet Member advised that the priority for bids submitted would be pedestrians first, cyclists second and public transport third. LTN micro-schemes would be a part of the overall work programme going forward, if it was feasible.
- c. In response to a question around how schemes were prioritised and what the criteria were, officers advised that the School Streets action plan was agreed by Cabinet last autumn and this set out the detailed criteria used. Officers also advised that the draft Walking and Cycling Action Plan set out the criteria used for determining LTN proposals going forwards. Officers advised that these criteria for prioritising LTNs were developed after the emergency TfL bidding window for new schemes last year and so the current schemes were based on existing proposals and feedback received from residents.

- d. The Panel queried the inherent assumption of increased traffic levels, given the impact of the pandemic and also raised concerns about the displacement effect on traffic to surrounding streets and neighbourhoods. It was also suggested that the impact of LTNs was disproportionately on working class communities who needed to commute work and, in some cases, may have two or three jobs. In response, the Cabinet Member acknowledged that the pandemic had resulted many people working from home but that traffic levels had been increasing steadily since lockdown as more people returned to work and that this would continue as the recovery continued. Within this, pollution levels were continuing to rise and that this had a disproportionate effect on poorer and more vulnerable residents. It was suggested that only 40% of residents owned a car, and this was overwhelmingly more affluent residents. However, less well-off residents, most of whom did not own a car, suffered the most as a result of air pollution. The Cabinet Member also highlighted the prevalence of road traffic accidents in London and the links between this and traffic volumes.
- e. Following a suggestion from the Chair, the Cabinet Member agreed to provide a written answer to the Panel around the impact of LTN's, traffic displacement and the extent to which they disproportionately impacted working class communities.
- f. The Panel cautioned against the law of unintended consequences and residents feeling that this was something that was being foisted upon them. The example of a pastor in Islington was raised and it was commented that the Council needed to consider the detailed impacts of its schemes on adjacent areas. In response, the Cabinet Member acknowledged that LTNs took time to bed-in and that examples in other boroughs had shown that initial negative impacts on traffic volume were not sustained and that these got better afterwards. Long term behaviour change was what was required, and it would take some time to bring this about.
- g. The Panel sought further clarification around attempting to disincentivise drivers and cautioned that a lot of car traffic in the borough was people travelling through the borough, rather than those that lived or worked here, and that this tended to be concentrated in the main thoroughfares. In response, the Cabinet Member advised that whilst disincentivising cars played a role, incentivising other modes of transport, was the most important factor in reducing traffic levels. The Cabinet Member acknowledged that making transport accessible to all was crucial. It was suggested that a lot of traffic in Haringey was being displaced from main roads to side roads, with the resultant impact of big increases in traffic on residential streets. LTN schemes in Walthamstow had seen a reduction in overall traffic and residents moving away from cars to public transport.

RESOLVED

Noted.

83. MEMBERSHIP AND TERMS OF REFERENCE

RESOLVED

That the Panel:

- I. Noted the terms of reference as set out Appendix A of the report and the Scrutiny Protocol set out at Appendix B of the report for the Overview and Scrutiny Committee and its Panels.
- II. Noted the policy areas/remits and membership for each Scrutiny Panel for 2020/21, as set out at Appendix C of the report.

84. APPOINTMENT OF NON-VOTING CO-OPTEE

The Panel received a report which sought approval of the re-appointment of a non-voting co-opted Member to the Panel.

RESOLVED

That a representative from Haringey Association of Neighbourhood Watches be appointed as a non-voting co-opted Member of the Panel for the 2021/22 Municipal Year.

85. TRANSPORT PLANNING UPDATE

The Panel received report which provided an update on the Council's Transport Planning programmes, including the draft Walking and Cycling Action Plan (WCAP), the Low Traffic Neighbourhood (LTN) Programme, Transport for London funding update (post-Covid) and actions being taken to reduce congestion and improve east to west transport links. The report was introduced by Rob Krzyszowski, Assistant Director, Planning, Building Standards & Sustainability and Maurice Richards, Transport Planning Team Leader, as set out in the agenda pack at page 69.

The following arose from the discussion of this item:

- a. The Panel welcomed the Peddle My Wheels scheme, which the Council contributed funding to, that allowed people to try out bikes before deciding to purchase them at a discounted rate. A Panel Member commented that cycleways in neighbouring boroughs seemed to be much better and sought assurances over how recent TfL infrastructure funding had been spent. In response, officers advised that the funding received for last year included £100k of funding from the DfT for bollards and segregation of cyclists on side roads. These works were originally due to be temporary and so some further work would be undertaken to improve these. The Panel was advised that the Street Space Plan was set out on the Haringey website, and this included details of all of the successful funding bids.
- b. As part of a follow up question, the Panel sought assurances around the latest round of TfL bids given the fact they were on a first come first served basis. In response, officers clarified that they had submitted a bid under the most recent bidding process and that this was not a new competitive bidding process. Instead, it was oriented towards schemes that had been submitted

previously where boroughs were already in discussions with TfL. Bids were either through the Street Space Plan or the LIP. Officers advised the Panel that they would provide updates on this round of funding bids, along with future rounds at a future meeting. **(Clerk – to note).**

- c. The Panel also sought clarification from the Cabinet Member about comments he had made previously on social media that other borough's LTN's were better than Haringey's. The Cabinet Member clarified that the point of his remarks was that Haringey did not have any LTNs at present and to emphasise the fact that Haringey could implement schemes that were as good as other boroughs
- d. The Panel sought clarification from the Cabinet Member about whether there was any data available about who was using the different cycling schemes and whether this was concentrated in particular areas. In response, the Cabinet Member highlighted the role of the Peddle my Wheels scheme in providing an opportunity for residents to try cycling and commented that he would like to see this scheme rolled-out further. The Panel was advised that only 3% of residents cycled and the point of building cycle lanes was to provide safe cycling routes for people who felt excluded from cycling because it was considered dangerous. The Cabinet Member advised that LTNs in other boroughs had seen increases in bike ownership because people felt safer and more able to cycle to work, school, doctors' surgeries etcetera.
- e. The Cabinet Member agreed to circulate a breakdown by area on take-up levels for the various different cycling schemes that were in place. **(Action: Cllr Hakata/Rob Krzyszowski).**
- f. The Chair noted that the delivery Plan for the Cycling & Walking Action Plan did not seem to be fully up to date and commented that a number of projects that did not have funding were RAG rated as amber. Furthermore, the Hornsey cycle way, which was part of Liveable Crouch End, was listed as green even though the funding had stopped. The Chair requested that officers updated the delivery plan and that rolling updates on the progress of projects contained within the delivery plan be brought to future panel meetings. The Chair also commented on the fact that cycle hangers for residential parking was also unfunded in the delivery plan. In response, the Cabinet Member acknowledged that the plan was slightly out of date due to the nature of the projects and that the delivery plan would be updated following the latest funding update. The Cabinet Member advised that he would be seeking to produce a rolling delivery plan and that this would help feed into the Panel's request for regular updates. **(Action: Cllr Hakata/Rob Krzyszowski).**
- g. Officers advised that the Walking & Cycling Action Plan was approved by Cabinet as a draft, which would then go out to public consultation and engagement. Officers emphasised the importance of consulting with residents on this document and advised that an updated version would be produced following the engagement process. In regard to having projects on the plan that did not have funding, officers advised that listing those on the plan was beneficial as it supported the submission of future funding bids to TfL and allowed the authority to point to those bids having been engaged upon with residents. Officers noted that some TfL funding had been secured for the design work of the Hornsey cycle way but funding for the implementation had not been secured yet.

- h. The Chair followed up to reiterate the point that officers should look at the RAG rating again on the delivery plan, as it was felt that listing a project as being amber, even though it did not have funding secured, did not seem to accurately reflect the level of risk for that project. The Chair also requested further information at a future meeting about how talks with TfL bus planners were going as the borough had not had any new bus routes in a very long time. The Chair also commented that she would like to see officers engage with residents about where new bus routes should be implemented as well as the prioritisation of locations for development of step-free access at key stations and how far officers had got with these discussions. **(To note - Rob Krzyszowski).**
- i. The Panel requested further information about cycle storage hangers. In response, officers advised that a bid had been submitted for this year under the LIP but due to TfL's funding situation this was currently suspended. A bid had been resubmitted through an alternative funding pot.
- j. The Panel queried whether the funding formula with the company that implemented cycling hangers could be re-examined as it was felt this was quite an expensive process. The Panel enquired whether this was something that could be brought in-house. Officers advised that this work stream was being looked at, including the potential for in-house delivery and that officers were keen to maximise cycle hanger delivery around the borough.
- k. The Panel emphasises the importance of buses and bus routes reflecting the needs of residents. It was commented that there were a whole range of people who were physically unable to use cycle lanes and that in that regard public transport should be seen as just as high a priority as cycling provision.
- l. In regard to cycle storage on housing estates, the Cabinet Member advised that conversations with HfH had taken place and that HfH were looking to re-provision some existing storage/garage facilities to support this.

RESOLVED

That the update was noted.

86. WORK PROGRAMME UPDATE

The Panel received a work programme update report for noting and further discussion around the Panel's work plan for 2021/22. The report was introduced by the clerk as set out in the agenda pack at page 137.

The Panel agreed to postpone indefinitely the proposed Scrutiny Review on Single Use Plastics and instead to undertake a review around the implementation of Low Traffic Neighbourhoods, the scope and boundaries of which would be agreed going forwards. The Chair also set out that in light of the deputation, she would like trees and the trees strategy to be included on the work plan. **(Action: Clerk).**

In response, some members of the Panel emphasised the importance of the Council's single use plastics policy and the need to scrutinise it. It was agreed that a report would come to a future meeting on this subject.

The Chair requested that panel members email the clerk with suggestions and priorities for the work plan. **(Action: All).**

The noted that she would like to see some rolling reports come to the Panel on particular topics.

In response to specific concerns around a piece of land near the Network Rail footbridge in Stroud Green, the Panel suggested that they would like to see a piece of work undertaken that looked at how well the Council worked with partners, such as Network Rail, on adopting a joined up approach to managing land and keeping it clear of litter. Cllr Bull agreed to email the Clerk with some further consideration of this topic, with a view to it being a future agenda item. **(Action: Cllr Bull).**

The Panel also noted that it would like an update from the new administration about a previous agreement to bring in vegetarian school meals once a week.

RESOLVED

- I. That the Panel noted its work programme, attached at Appendix A of the report, and considered whether any amendments are required.
- II. That the Overview and Scrutiny Committee be asked to endorse any amendments at its next meeting.

87. NEW ITEMS OF URGENT BUSINESS

N/A

88. DATES OF FUTURE MEETINGS

Noted as:

20th September 2021, 11th November 2021, 14th December 2021 and 3rd March 2022.

CHAIR:

Signed by Chair

Date

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Report for: Environment and Community Safety Scrutiny Panel, 13th September 2021

Title: Waste, Recycling and Street Cleansing Performance

Report authorised by : Eubert Malcolm - Assistant Director Stronger & Safer Communities

Lead Officer: Beth Waltzer – Interim Head of Waste

Ward(s) affected: All

Report for Key/Non Key Decision: Non Key

1. Describe the issue under consideration

This report provides an update on the borough's waste, recycling and street cleansing performance.

2. Recommendations

- 2.1 That Members are asked to note the content of the report and provide officers with any comments regarding their experience, or reports they have received relating to the waste, recycling, and street cleaning services.

3. Background

- 3.1 The service would like to place on record our acknowledgement of the current unprecedented period that we are in. Not only are there continuing impacts from Covid-19 but a secondary issue relating to HGV shortages has emerged, which is a national issue resulting in suspended and disrupted services across many local authorities. We continue to work closely with our service provider Veolia to minimise the impact these issues have on our environmental services. We are reviewing these impacts daily and have, to date, been able to rely on a full core collection and street cleansing service being delivered across the borough, which is a testament to the commitment of local staff involved in the operations.
- 3.2 The Council delivers waste and street cleansing services through its contract with Veolia Environmental Services. The 14-year contract commenced in 2011, and covers waste collection, street cleansing, graffiti and flyposting clearance, fleet management, leafing, and winter gritting. Veolia also provide services to Homes for Haringey.

3.3 The Council has a statutory duty to collect residential waste from residents. London boroughs have an additional duty to act in general conformity with the London Environment Strategy, prepared by the Mayor of London. This ensure that the methods used for waste and recycling collections are broadly the same across London.

3.4 The Cleaner Haringey Strategy was approved in March 2021 which sets out how we intend to improve our litter and waste related service standards. It contains four priorities relevant to waste and cleansing services which are as follows:

- Fight illegal rubbish dumping
- Keep our streets free from litter and detritus
- Tackle the blight of graffiti and fly posting
- Ensure waste is sufficiently contained in bins

3.5 A new Borough Plan is currently being worked on, for publication in October 2022, the themes it will likely contain and relevant to this report being:

- Improving cleanliness and reducing the level of fly-tipping and
- Minimising the amount of waste generated by our residents and businesses and increase levels of recycling.

4. Performance - Cleansing

4.1 The performance of this contract is measured through a service performance framework which includes a set of Strategic Performance Indicators (SPIs). There are two SPI's directly related to cleansing performance as follows:

- SC2 – Resident Satisfaction
- SC4 – NI195 Performance

4.2 In addition, there are 39 separate Contract Operational Targets (COTS) indicators that are used to manage contractor performance and if necessary, ensure rectification of failures within prescribed timescales.

4.3 Establishing a benchmark against similar authorities is harder to present as the government has abolished the national indicator (NI195) in England for cleanliness, removing the need for councils to formally report. Moving forward, the Council will undertake some benchmarking against other relevant Authorities in early 2022.

4.4 Waste Team Monitoring

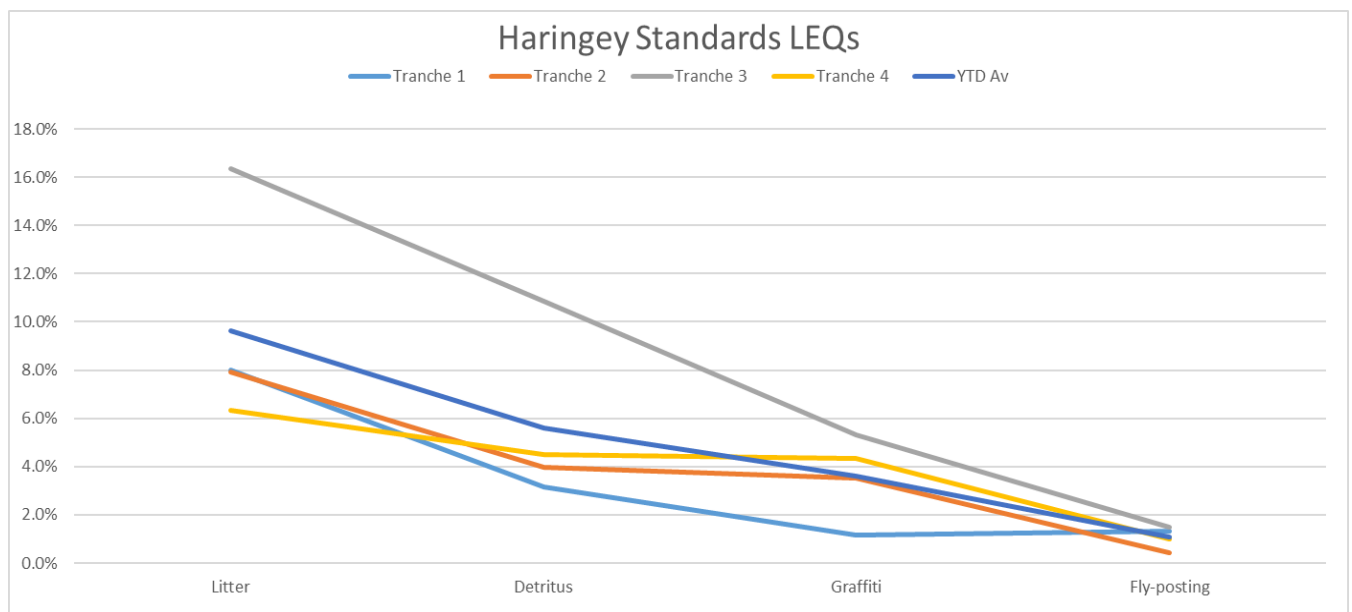
- 4.5 The waste team has three monitoring officers who undertake NI195 and contractual monitoring for street cleansing, waste, and recycling. Table 1 sets out the contractual performance of NI195 from 2015.

Table 1: Street Cleansing NI195 Results										
	Year									
	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
Litter Target (NI195a)	7	11	11	11	11	11	11	11	11	11
Litter Achievement (NI195a)	4.6	5.2	11.3	7.3	7.7	9.6				
Detritus Target (NI195b)	11	12	12	12	12	12	12	12	12	12
Detritus Achievement (NI195b)	3.9	2.8	12.8	7.7	3.5	5.6				
Graffiti Target (NI195c)	3	4	4	4	4	4	4	4	4	4
Graffiti Achievement (NI195c)	1.3	2.3	3.8	3.3	4.8	3.6				
Flyposting Target (NI195d)	3	3	3	3	3	3	3	3	3	3
Flyposting Achievement (NI195d)	6.7	1.0	1.9	1.2	1.5	1.1				

- 4.6 Table 2 sets out the NI195 monitoring over the last 3 tranches (April 2020 to March 2021)

Table 2: NI195 2020/21 Results				
	Litter	Detritus	Graffiti	Fly-posting
Tranche 1	8.0%	3.2%	1.2%	1.3%
Tranche 2	7.9%	4.0%	3.5%	0.4%
Tranche 3	16.3%	10.8%	5.3%	1.5%
Tranche 4	6.3%	4.5%	4.3%	1.0%
YTD Av	9.6%	5.6%	3.6%	1.1%
Targets	11%	12%	4%	3%

Graph 1 - NI195 Results for April 2020 to March 2021



4.7 Summary of Waste Team Cleansing Monitoring

- The day of sweep monitoring confirmed over 7800 locations monitored April 2020 to January 2021 achieved a 97% pass rate for litter and 100% pass rate for detritus (Grade B and above).
- Monitoring of day of sweep was suspended by the waste team to undertake targeted Covid/Reroute monitoring from January to June 2021, however NI195 monitoring still took place.

- Fail levels monitored 4-7 days after day of sweep were recorded as follows: T1=5% T2=6% T3=6% T4=4% which would suggest that generally cleanliness standards are being maintained between sweeps.
- Inhouse inspections resumed in July 2021.

4.8 Veolia Village Manager Cleansing Inspections

Veolia managers carried out a total of 1568 NI195 style inspections from January – May 2021 inclusive, an average of 313 per month.

- Inspections were carried out on the scheduled day of sweeping at each of the locations.
- The average pass rate for litter and detritus (locations inspected graded at B and above B) across the period was 99% and 99.78% respectively.
- Flyposting and graffiti scores were also observed to be positive with pass rates of 98.59% and 99.93% achieved respectively

5. Commentary on Cleansing Performance

- 5.1 Prompted by the Covid-19 pandemic, with the need to limit reliance of public transport and people needing to get essential exercise, more Londoners have taken to walking and cycling. The 'Centre for London' think tank found 48% of Londoners were walking more and 20% are cycling more.
- 5.2 Whilst it is difficult to establish a direct correlation between increased footfall from Covid and a corresponding detrimental impact on NI195 levels, the figures do confirm a decline in cleanliness over Tranche 2 and 3 when lockdowns were in place. Graffiti and fly posting were also affected detrimentally over this period as illustrated in table 2. However, despite the lower performance within these tranches, due to a higher corresponding performance in the remaining tranches, the contract achieved its NI195 targets as an average overall for 2020/21 (9.6% achievement versus 11% target for litter and 5.6% achievement versus 12% target for detritus).
- 5.3 The Veolia Manager cleansing inspections differ from the Waste Team cleansing inspections results as they are covering different geographical areas and different times of the year but overall, they reiterate that performance is at a high standard in recent months.

6. Planned Improvements – Cleansing

6.1 On Street Containment of Waste

- 6.1.1 In March 2020, the first part of a trial of 'black boxes' began to examine whether the cleanliness of the street scene could be improved by providing residents in flats above shops with some form of containment to use prior to collection.
- 6.1.2 An evaluation of the trial in the summer of 2020 confirmed that thoughtfully placed, well signed, appropriately sized, and well-designed structures like black boxes can store waste safely, contribute to the waste containment challenges Haringey has and improve the street scene overall. The additional waste containment capacity offered to residents and commercial premises had reduced the number of sacks on the street - the monitoring also confirmed that the boxes were either partially or in the case of 15 of the 22 locations fully utilised.
- 6.1.3 The second part of the pilot began in February 2021 which examined how we can containerise trade waste more effectively. The urban nature of the Borough (i.e. congested and narrow in parts pavements) does not support the required capacity of boxes required to contain both residential and trade waste and competition law prevents exclusivity of Veolia Haringey Trade waste. Subsequently the scheme will apply to residential waste only.
- 6.1.4 West Green Road pilot headline findings
- In 91% of instances, household black sacks and carrier bags were presented compliantly, i.e., inside a drop box or next to it if full.
 - 99% inspections of box locations resulted in NI195 passes
 - Boxes reported as full on 14% of inspections, 93% of which occurred after 1st timed collection.
 - Fly tipping reports accounted for 4% of total inspection reports. Most of these instances involved black sacks
 - In the 6-weeks of the trial, 70 enforcement actions were taken resulting in £1,450-worth of fines.
- 6.1.5 As a result of the above, the trial concluded that on-street containment can significantly reduce the number of bags needing to be presented on street and help maintain a cleaner street scene when the capacity provided by the boxes is sufficient and the scheme is supported by enforcement activity.
- 6.1.6 As outlined in the Cleaner Haringey Strategy, the data and "lessons learnt" from both parts of the trial have been used to develop our borough wide roll

out plan for the waste containment scheme has commenced and is due for completion by April 2022.

6.2 Litter Bin Strategy

- 6.2.1 It has been identified that a litter bin strategy needs to be developed which will provide an intelligent approach to our provision, type and strategic location of litter bins thereby improving the overall street scene. Included within this piece of work will be a review of how we can increase recycling from our street litter arisings. The timescale for completion of this work is 2022 to allow for any NLWA and LEL contractual discussions.

6.3 Sweeping Trials

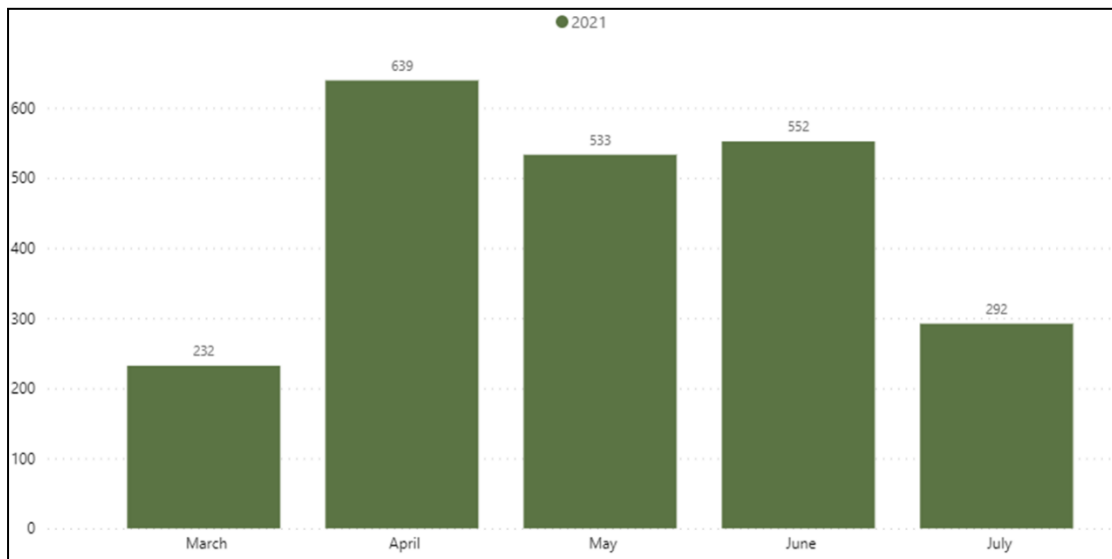
- 6.3.1 Investigative work is ongoing to test whether we can find further efficiencies while ensuring street sweeping schedules are matched to need. The trials will explore opportunities of increased mechanisation of cleansing tasks and re-evaluating the time and focus we need to spend in different parts of the borough to maintain acceptable standards and will be implemented from September 2021.

6.4 Proactive Graffiti Service

- 6.4.1 Officers and Veolia implemented a joint proactive “clear all” graffiti service which has been operating for 6 months from March 2021 targeting the proactive removal of graffiti from all 19 wards. The service started in the East of the borough and focused initially on transport hubs and high streets.

Consultation with relevant resident and community groups was sought as to locations of graffiti.

**Graph 2: Incidents of proactive graffiti and removal since March 29th, 2021
(please note, the service started late March 2021)**



6.4.2 The service has had a positive impact reducing graffiti levels from 3.5% Tranche 2 2020/21 to 2.7% Tranche 1 2021/22. The development of a street art policy is being developed in conjunction with the project and in partnership with the Arts and Culture Manager and due for completion March 2022 as outlined in the Cleaner Haringey Strategy.

7. Waste and Recycling Performance

The performance of this contract is measured through a service performance framework which includes a set of Strategic Performance Indicators (SPIs). There are three SPI's directly related to waste and recycling performance as follows:

- SC1a – Recycling Rate
- SC2 – Resident Satisfaction
- SC5 – Missed collections per 100,000 (refuse and recycling)

7.2 In addition, there are 12 separate Contract Operational Targets (COTS) indicators that are used to manage contractor performance and if necessary, ensure rectification of failures within prescribed timescales.

7.3 The waste and recycling arrangements that Haringey has in place is consistent with the Mayors Environment Strategy. Haringey Council is already one of

London's better recycling performers at 31.18% It is already delivering key policy of:

- A minimum level of service for recycling requiring kerbside recycling of the six core dry recyclables
- A weekly collection of food waste for all kerbside properties (and to flats where feasible).
- Combined with the alternate weekly collection of black bag waste that the Council also undertakes, Haringey are already delivering what is generally considered to be a leading example in terms of services that reduce waste arisings and maximise recycling.

7.4 Table 3 below provides the Council's recycling target and achieved recycling rate each year, from the financial year 2016/17.

Table 3: Recycling Rate V Recycling Target										
Year	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2023/24	2024/25
Recycling Target	35.5%	36%	35%	34%	36%	38%	38%	38%	38%	38%
Recycling Rate Achieved	35.2%	32.9%	30.17%	30.14%	31.18%	-	-	-	-	-

7.5 Table 4 below provides the Council's recycling performance within NLWA partners for 2019/20. Please note confirmation of other Borough's recycling rate for 2020/21 has not been verified yet so the Haringey figure represents the 2019/20 figure for comparable reasons:

Table 4: NLWA Borough Recycling Rates 2019/20	
Authority	Recycling Rate (%)
Enfield	33.1%
Waltham Forest	32.3%
Barnet	32%
Haringey	30.14%
Islington	29.6%
Hackney	28.3%
Camden	26.5%

8. Reroute, Covid and HGV shortage – impacts on waste and recycling service delivery

The reroute operation was implemented in October to separate out kitchen and food waste enabling lower processing costs as each waste stream is cheaper to process separately as opposed to being mixed. By implementing the change in service, the Council is projected to save £159k per annum on disposal costs through the NLWA levy.

- 8.2 Further benefits from the change are a reduction in fleet on the service resulting in reduced operational costs and lower carbon emissions. Despite intensive modelling by Veolia, the implementation of the scheme was hindered by unforeseen Covid related challenges.
- 8.3 The service managed to drive down missed bin rates to near pre reroute levels by April 2021, however in recent weeks, the covid numbers have increased again and this together with national HGV driver shortages have meant that over the last month, some rounds are again unable to complete their work on the scheduled day. This is due to a high dependency on agency staff for Covid and holiday season cover which means staff are unfamiliar with services and routes.
- 8.4 The HGV shortage is a national issue and hourly rates are increasing by up to four or five times average values. Competition is high between the public and the private sector to attract staff with bonuses being offered by the some of the retail companies. The contract currently has 7 HGV vacancies.
- 8.5 The Council and Veolia are working hard to resolve these issues and the following outlines some of the actions taken to tackle these challenges to date:
- Continuation of lock down Covid safety measures for staff despite a relaxation in legislation
 - Joint recruitment day between Haringey Works and Veolia and further ongoing recruitment drives
 - Campaign focus on benefits of localised work as opposed to long distance driving
 - National media recruitment campaign in targeted publications
 - Paid social media campaign on Facebook and Instagram
 - National campaign with online recruitment sites with sponsored adverts
 - Internal apprentice and fast track LGV courses
 - Expansion of agency network through our key supplier Comensura
 - Building a driver attraction campaign with Dept for Work & Pensions and with Pension & Careers Training partnership
 - Introduction of referral bonus
 - Introduction of signing on bonus
 - Holiday buy back options for staff
 - Review of pay and benefits across the board
 - Review of recent leavers/retirees: offer of flexible/part time working
- 8.6 In the meantime, Officers and Veolia are:
- Continuing monitoring by the Waste Team and Veolia management of repeat complaints
 - Undertaking joint visits where safe to do so
 - Asking residents to wait up to 72 hours before reporting a missed collection to allow the services to complete their work.
 - Undertaking a range of actions within the contract improvement plan set out in section 13

- 8.7 Table 5 sets out the missed bin rate per 100,000 for refuse and recycling services. The achievement has been within the target year on year prior to this financial year.

Table 5: SC5 - Missed Bin Rate per 100,000										
	Year									
	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
Target Refuse Missed Bins per 100,000	85	80	75	70	65	60	55	50	50	50
Achievement Refuse Missed Bins per 100,000	50	47.6	41.5	35.5	41.4	45				
Target Missed Bins Recycling per 100,000	85	80	75	70	65	60	55	50	50	50
Achievement Recycling Missed Bins per 100,000	62	65.6	73.6	43.7	52.8	67.8				

- Whilst the missed bin rate figure has missed its target for 2020/21, the service undertakes approximately 315,000 collections per week and therefore the missed collection rate is still a relatively low proportion of collections in total
- It is worth noting that despite all the challenges outlined above, the contract managed to achieve its refuse target for missed bins per 100,000 for 2020/21 and only marginally missed its recycling target for missed bins per 100,000 for 2020/21. Furthermore, we have maintained a full suite of services throughout the last 12 months unlike many councils who have been forced to suspend services in their entirety.

9. Recycling Target Performance Discussion

- 9.1 Table 3 indicates that the recycling target, and recycling performance fluctuated between 2016 and 2018 due to legislative changes and changes to council services.
- 9.2 Legislation and demand led changes are beyond the Council's control; all councils will have experienced the same change in operating environment which, it has been estimated has impacted on recycling performance by up to 4%. Specifically, the change in regulation meant more waste that was initially collected as recycling had to instead be treated as contaminated and subsequently disposed of as refuse. The increased proportion of refuse subsequently reduced the recycling rate.

- 9.3 In 2017, the Council introduced the green waste subscription charge. Garden waste is a statutory service for which a charge can be made. Although the service has grown significantly since introduction and generates approximately £635k per year. There is limited evidence that garden waste may have migrated into the residual waste stream though overall trends do not show this to be significant. There is also tonnage data indicating migration of tonnages to RRC's, but this does not account for the lost tonnage in total.

10 Impact of Covid 19 on Waste and Recycling Tonnage

- 10.1 The recycling rate for 2021/22 is approximately 31.18%. The improvement has been driven by 26% growth in dry recycling (c900t) and a 35% increase in organics (assisted by the separation of food and garden waste). There has also been an increase in the garden waste subscriptions (resulting in an additional c. 500T) compared to the same period last year.
- 10.2 Covid19 has had an important impact on patterns of waste and recycling. As residents spend more time at home due to Government restrictions, they are consuming more goods and services at home. Wastes ordinarily created and disposed of within commercial waste and litter bins are also being disposed of within the household waste stream and although COVID has seen overall waste levels increase by around 2.3%, we have seen greater increases in the proportion of dry recycling and organics (with c.17% growth in dry recycling (c.2,500 tonnes) and a c.16% increase in organics (helped by separate food collection and increase in garden waste subscriptions) (c.870 tonnes) compared to the previous year.
- 10.3 However, recycling tonnages were adversely affected by the temporary closure of public reuse and recycling centres (RRCs) and more limited access thereafter, due to Covid. The combination of factors led to a net increase in the household recycling rate in 2020/21 to 31.18% which represents an increase of 1.04% over the 2019/21 recycling rate.
- 10.4 Based on data available for 2021 so far, we have continued to see above average levels of waste, for dry recycling and organics, but not to the same extent as in 2020. A provisional recycling rate for quarter 1 of 2021/22 will be available at the end of September.
- 10.5 **Contamination**
- 10.5.1 The overall reject rate of the dry recycling we collect is 15.02% for 2020/21. This rate comprises loads being rejected plus any "contaminants" rejected

through the materials recycling facility (MRF) process. This rate has improved from the previous year's contamination rate of 18.57%. Rejected materials are a combination of largely harmless 'non-target' materials that people assume can be recycled that the MRF picks out (eg. Hard plastics), and items that are active contaminants which are both non-recyclable and spoil other clean recyclables too (e.g nappies and food).

11. Revision of the Waste Reduction and Recycling Plan and Consolidating Progress in Recycling Performance

- 11.1 The requirement by the Mayor of London on each borough to produce a Reduction and Recycling Plan gave the council the opportunity to review and reset our recycling aspirations, and in December 2019, the Council adopted a recycling target of 38% for 2022. This was based on external modelling undertaken for the GLA of the maximum rate each borough could achieve and therefore represented a stretch target for the council.
- 11.2 The RRP was reviewed in June 2021 and a full update, including the dashboard of performance, will be undertaken during 2022. The timescale is pending confirmation from the GLA, with the 2022 targets to be measured against the 21/22 recycling rate, which will be available in late 2022.
- 11.3 The panel will note the gap between the Council's published performance targets and its actual performance. Given that the services the Council has in place meet the Mayor's Environment Plan and considering that this is a statutory requirement, the Council's continued focus to increase recycling performance will be through the actions detailed within table 9 below and further detailed modelling will be undertaken within the forthcoming service review which will link into the recent waste consultations.

Table 6: RRP Actions and Associated Timescales

Table 6 RRP Actions and Timescales					
Service	Aim	Deliverables	Timescale	Outcomes	RAG Status
RRP	Review RRP	<ul style="list-style-type: none"> Establish clear objectives, outcomes and timescales 	June 21	<ul style="list-style-type: none"> Updated RRP 	Completed
Food Waste	Increase capture of food waste (inc. targeted actions on Estates)	<ul style="list-style-type: none"> Estate bin survey Increased participation Increased capture Reduced contamination 	Autumn 21	<ul style="list-style-type: none"> Increase in caddy set out rate of 3% on the round receiving a handwritten note and 2% for both rounds receiving personalised postcard or standard leaflet. 	Complete
Garden Waste	Increase garden waste recycling and associated income	<ul style="list-style-type: none"> Undertake Review Develop and Implement Project plan Increased participation Increased capture Increased income 	Spring/Summer 21	<ul style="list-style-type: none"> Subscription numbers are up c.800 for the year to date compared to the same period last year. 	Complete
WEEE Collections	Kerbside WEEE collection pilot	<ul style="list-style-type: none"> Increased recycling rate Increased customer satisfaction 	By March 2022 –	<ul style="list-style-type: none"> To be confirmed following pilot 	Delayed due to the service impacts associated with Covid and HGV driver shortages – pilot to be undertaken by March 2022
Contamination	Develop policy and associated enforcement action	<ul style="list-style-type: none"> Clearly defined process for contamination Reduce contaminated bins Increase recycling 	March 22	<ul style="list-style-type: none"> To be confirmed following options appraisal 	Options appraisal commenced

		<ul style="list-style-type: none"> Reduce associated fly tipping 			
Waste Reduction	Aiming to reduce residual waste from households, from a baseline of 515kgpa to 460kgpa in 2022 and 440kgpa in 2025	Work with NLWA to deliver outputs from the NLWA's waste reduction plan	Ongoing		Broadly, we have seen overall waste levels (i.e. recycling and residual waste) increase since 18/19. During 20/21, because of closures of schools and workplaces and many more people being at home, we have seen a significant increase in the total amount of waste we have had to collect. We will need to understand the trend in tonnages as/when Covid related changes ease to re-assess the challenge for recycling and waste reduction.
Increased recycling from Street Sweeping	Divert recyclables from street cleansing services	<ul style="list-style-type: none"> Increased recycling rate Improved public perception of Borough recycling activities 	Spring 22	To be confirmed in line with the scheme	
Textile Trial	Trial 3 rounds with 2 x branded textiles and shoes Only bags and accompanying comms for a bookable collection service.	<ul style="list-style-type: none"> Increased diversion of textiles from residual waste stream Increased customer satisfaction 	Started July 21	To be reported back once complete	Underway

Fleet	All HGVs in the waste fleet to be Euro VI (diesel) Low Emission Zone compliant by 2021.	Low polluting fleet	Complete		Complete
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Communications

- 12.1 We have an overarching service communications plan as well as a separate bulky and garden waste plan. In addition, we have a robust social media grid which promotes several different campaigns/service updates every week and includes campaigns undertaken by NLWA on waste and recycling communications.
- 12.2 In the meantime, the following activities aimed at increasing our recycling rate are planned over the next 6 months:
- Digital food waste campaign featuring 2 brief animations which will be running in September for street based properties
 - Development of a partnership campaign between HfH and the council for communal food waste containers by early next year
 - Repeat of the digital contamination campaign, featuring 8 animations translated into 6 key languages in October
 - From January we will be undertaking a targeted garden waste campaign aimed at both renewals and new subscriptions following a GIS exercise to identify properties with gardens who are not subscribers
 - Agripa panels promoting the bulky waste service on the side of our refuse and recycling fleet which will be available following the shortly arriving vaccination message
 - Seasonal social media campaigns around leafing season, Halloween, gritting/winter maintenance and the festive period will take place
 - Continued publicity of the bulky waste and graffiti services, staff vox pop videos, the textiles and WEEE collection pilots

13 Contract Improvement Plan

- 13.1 Officers are working with Veolia on a range of contract reporting improvements both for Veolia and the waste team for waste and cleansing to assist in resolving complaints in a more effective manner as well as targeting recurring issues. Phase 1 of the project has been completed which has resulted in a refresh of existing performance data provided to the Council and new data to provide greater contract transparency, i.e. new repeat issue KPI for waste and recycling.
- 13.2 Phase 2 of the project will adapt the Council's monitoring services in line with the forthcoming restructure of the Waste Team allowing for more intelligence led monitoring and effective contract management. The timescale for completion of this is early 2022.

14 Resident Satisfaction – Waste and Cleansing

- 14.1 The level of street cleanliness we achieve meets the expectations of 73% of our residents (Veolia contract customer satisfaction survey) but this is caveated by repeating concerns over litter and dog mess. More than three quarters of residents living in low rise housing are satisfied with our recycling and waste collection services but those living in housing blocks and flats-above-shops clearly feel improvements could be made. There is an overwhelming dislike of seeing sacks of waste along the pavements of our timed collection zones and the mess they create. Timings are inconvenient for some residents living above shops and the businesses below them. Ideally, allowing rubbish to be placed on the pavement is not a message we want to have to give.

The last face to face survey was undertaken in 2018 (Residents' Survey)

<https://www.haringey.gov.uk/local-democracy/have-your-say-haringey/residents-survey> and was commissioned and compiled through the results of 1,900 face-to-face interviews with residents from across the borough, acknowledged the level of positivity held among the people of Haringey. More than four in five residents are satisfied with their local area as a place to live. Key dislikes included crime or antisocial behaviour and litter, as cited by a third of all respondents.

14.2 Contract Satisfaction Rates

Table 7 sets out the results of the Veolia resident satisfaction survey. The drop-in satisfaction rates and associated targets from year 2016 for street cleansing represent the implementation of a reduction in street cleansing frequency from twice weekly to once weekly. The results have steadily increased since that point and demonstrate satisfaction levels from this survey are exceeding targets:

Table 7: Veolia Contract Satisfaction Survey Results										
	Year									
	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
Street Cleansing Satisfaction Target	65%	62%	62%	62%	62%	62%	62%	62%	62%	62%
Street Cleansing Satisfaction Results	75%	62%	66%	67%	68%	73%	-	-	-	-
Refuse Satisfaction Target	70%	72.5%	70%	70%	75%	75%	75%	75%	75%	75%

Refuse Satisfaction Results	76%	71%	74%	72%	77%	80%	-	-	-	-
Recycling Satisfaction Target	75%	75%	70%	70%	75%	75%	75%	75%	75%	75%
Recycling Satisfaction Results	86%	81%	77%	76%	81%	81%	-	-	-	-

15 Contribution to strategic outcomes

- 15.1 Waste, Recycling and Cleansing outcomes supports the Place Priority of the Borough Plan, specifically “A cleaner, accessible and attractive place” with the objective to improve cleanliness and “minimising the amount of waste generated by our residents and businesses and increase levels of recycling”. It also aligns with the existing and prospective Community Safety Strategy for Haringey.

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Report for: Environment and Community Safety Scrutiny Panel, 13th September 2021

Title: Briefing on the changes to Waste Legislation

Report

authorised by: Eubert Malcolm - Assistant Director Stronger & Safer Communities

Lead Officer: Beth Waltzer – Interim Head of Waste

Ward(s) affected: All

Report for Key/

Non Key Decision: Non Key

1 Describe the issue under consideration

- 1.1 This report updates the panel on the Extended Producer Responsibility Consultation (EPR) 2021, the Deposit Return Scheme (DRS) 2021 and the Household and Business Consistency in Recycling Consultation 2021.

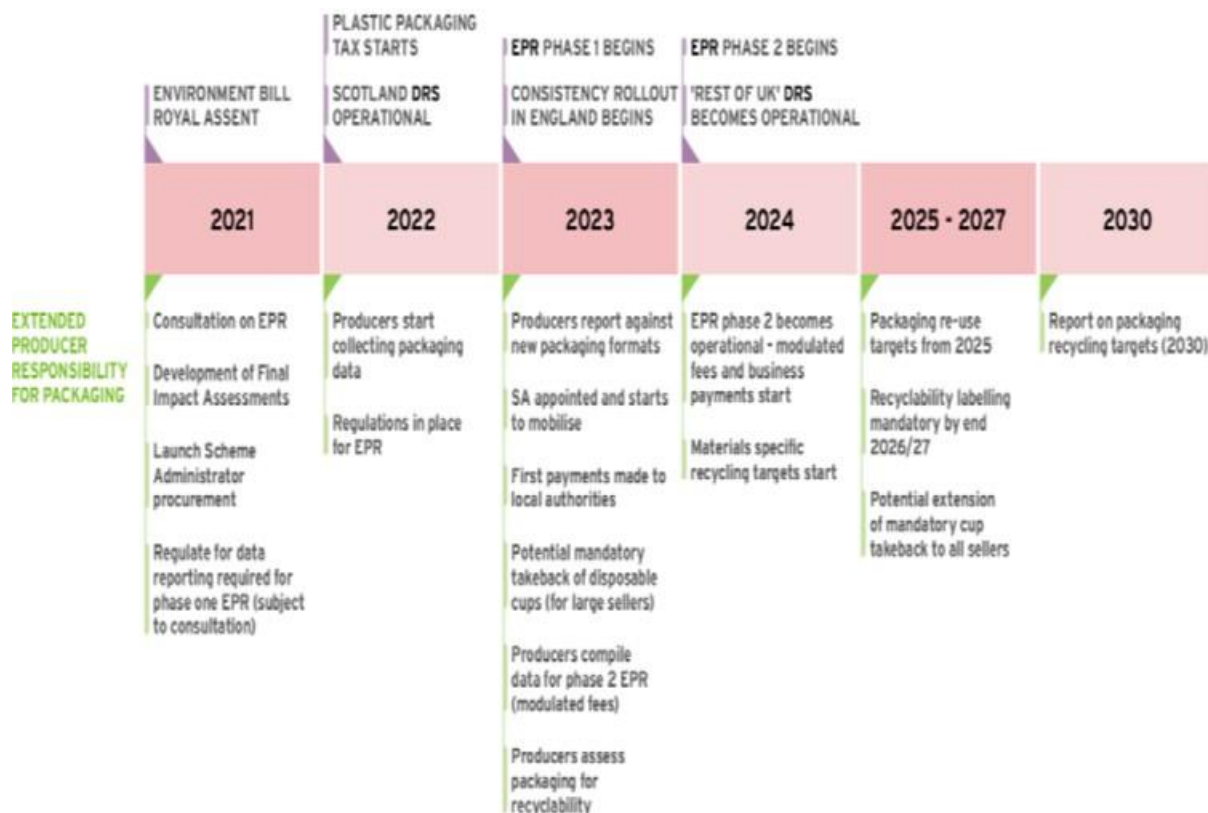
2 Recommendations

- 2.1 That Members are asked to note the content of the report. No decisions required yet other than to note contents of the report and that the Board agrees to receive further updates as appropriate.

3 Background

- 3.1 These consultations follow on from the DEFRA Resources and Waste Strategy (RAWS) in December 2018, related consultations in 2019 and the Environment Bill progression through parliament.
- 3.2. The RAWS contains some significant changes in waste policy across the UK that will have some fundamental impacts on waste management services Nationally.
- 3.3. There have been four interlinking consultations relating to the RAWS. These relate to a Plastic Packaging Tax, Extended Producer Responsibility, the Deposit Return Scheme (closing date for responses for EPR and DRS was Friday 4 June 2021) and the consultation on Consistency of Collections (closing date was 4th July 2021).
- 3.4 Understanding the full impacts of the consultations was driven/influenced by responses from NLWA, LEDNET and London Councils, ALCO, LARAC and NAWDO though the final response was in line with our WDA - NLWA. The full responses from LBH to the EPR, DRS and Consistency Consultations can be provided by the waste team if required.

- 3.5 The figure below summarises the planned timescale for the introduction of the EPR and DRS. It is envisaged the first payments to LA's will be in the second half of 2023. The timescale for the consistency regulations is also from 2023.



4 EPR

- 4.1 On March 24th 2021, Defra published its second consultation on proposals for the introduction of a new Extended Producer Responsibility system. The Government recognises the current system needs reform and wants to make packaging producers “responsible for the full net cost of managing packaging once it becomes waste”. The consultation summarises proposals and options for these reforms and poses 104 questions for consultees to consider.
- 4.2. The principle aim of the EPR is to make the producers of packaging responsible for costs of managing the waste with the aim of reducing packaging in the first instance and making the remaining waste as recyclable as possible. A secondary aim is to contribute to less packaging being littered
- 4.3. In the consultation Defra defines five overarching principles for packaging EPR:
- Producers are incentivised through the fees they pay or by other complementary measures to reduce unnecessary and difficult-to-recycle packaging, to design and use packaging that is recyclable and to promote reusable or refillable packaging where it is a feasible option
 - Producers will pay into the system either directly or through the price they are charged by others in the supply chain consistent with the ‘polluter pays’ principle

- Producers will bear the full net cost of managing the packaging they handle or place on the market including at end-of-life to achieve agreed targets and outcomes
- Costs paid by producers will support a cost-effective and efficient system for managing packaging waste, including the collection of a common set of packaging materials for recycling from households and businesses
- Actions by producers will enable consumers to play their part and correctly manage packaging waste through access to good services, labelling and other means that tell consumers how to recycle and dispose of packaging, and enhanced communications campaigns.

4.4. The desired outcomes from EPR are listed as:

- That unnecessary packaging - packaging that is not required to protect a product or excess packaging - is avoided; this will help reduce packaging and packaging waste
- That opportunities to replace single-use packaging with reusable or refillable packaging increase, particularly for consumer products
- That more packaging is designed to be recyclable, so packaging that cannot be recycled because of the material or the materials it is made from, or due to its format, will cease to be used where it can be avoided
- That packaging waste recycling increases proposing that by 2030, 73% of all packaging placed on the UK market and in scope of packaging EPR will be recycled
- That the quality of packaging materials presented for recycling increases across the packaging value chain and more packaging is recycled into higher value and closed loop applications; and
- That packaging EPR and the deposit return scheme contribute to less packaging littering.

5. Material Scope and Targets

- 5.1. The consultation proposes minimum recycling targets for the six packaging materials (plastics, paper/card, steel, aluminium, glass, and wood). These equate to an overall recycling rate for EPR packaging of 73% by 2030. The consultation indicates the intention to consider whether 'closed loop' recycling targets for materials, in addition to glass, are required to drive quality and end markets, and to introduce obligations, possibly in the form of targets, to increase the use of reusable/refillable packaging.
- 5.2. Plastic film and flexible packaging such as single-use carrier bags, bread bags, and wrappers make up a third of plastic packaging placed on the market annually in the UK. However only a small proportion is recycled due to challenges with collection, sorting and recycling as well as end markets. Government recognises that it needs to give a clear signal to help stimulate investment in sorting and reprocessing infrastructure. Subsequently, the proposal sets out the introduction of collections and

recycling for all plastic films and flexibles (F+F) no later than the end of financial year 2026/27, with collections of F+F from businesses no later than 2024/25.

- 5.3. Currently the Council does not have access to plastic film recycling at NLWA and therefore this would need to be acquired by NLWA. An additional issue with this material is that there is a high likelihood of contamination created from residue on films potentially compromising all recyclables. Exact contamination levels at Haringey by material type are unknown and therefore difficult to quantify potential impacts from the inclusion of this material.
- 5.4. Biodegradable plastics are not proposed to be included. Presently there are challenges associated with the use and management of compostable and biodegradable packaging and evidence suggests that some of these types of materials do not fully biodegrade in the open environment and some require specific treatment at the end of their life. Subsequently, the consultation proposes that biodegradable, bio-based and compostable plastic packaging to be deemed non-recyclable until such point that the state of evidence, collections and infrastructure for this packaging can be improved and therefore this material will attract higher fee rates.
- 5.5. The recycling target for fibre-based composite packaging e.g. disposable drinks cups, sandwich boxes (skillets) and food and drink cartons and mandatory disposable paper cup takeback/collections - e.g. for businesses selling takeaway coffee is proposed at a later date of 2025/27. The consultation seeks views on whether a mandatory cup takeback and recycling requirement should be placed on businesses selling filled disposable paper cups to provide for the separate collection of used cups (either generated in-store or consumed 'on-the-go'). This could be through both instore and front of shop collection points and would extend to accepting all disposable paper cups at these collection points irrespective of brand or where the drink was purchased.

6. Administration

- 6.1. There are two proposals for how the scheme should be governed: 1) Single body administrator or 2) Single body administrator and producer compliance schemes. The general LA response is to propose a single body administrator (on a not for profit basis).
- 6.2. The administration and governance arrangements for EPR will need to support producers in complying with their obligations and have robust process and financial flows and outcomes transparent whilst providing flexibility for producers to decide how best to meet their obligations.

7. Obligations and Responsibilities

- 7.1. For the EPR, Government proposes the introduction of a single point of obligation (i.e. a single producer is responsible for the cost of managing a piece of packaging) as opposed to the current model where the obligation for a single item of packaging is shared across multiple businesses. This will focus the obligations onto those who are best placed to reduce and/or increase the recyclability of the packaging they use.

- 7.2. The consultation details the proposed obligations for reporting and payment of costs for the different types of obligated producer. The consultation proposes that the fees producers will pay to cover the disposal costs of their packaging should be varied to reflect criteria such as recyclability. For instance, producers whose packaging is easily recyclable will pay lower fee rates, while fee rates for packaging which does not contribute positively to scheme outcomes will be increased (for example polystyrene).
- 7.3. There is a proposal to lower the existing small business de-minimis threshold, and for unfilled packaging sold to small businesses under a lower de-minimis, to obligate wholesalers/manufacturers selling direct to these businesses. This effectively means that smaller business will not be exempt from the requirements.
- 7.4. There is a proposal to place obligations on online marketplaces for any filled packaging that is imported through their platform and sold directly to customers in the UK, by their clients.

8. Full Net Costs

- 8.1. The proposals for the full net costs of managing packaging waste cover the following elements and Officers have calculated the associated values though the exact apportionment of funding between Local Authorities is not known at this stage:
- The collection, sorting and recycling of packaging waste from households and businesses - £726m when Extended Producer Responsibility is fully operational, increasing to £915m in 2032
 - The collection and disposal of packaging in the residual waste stream from households only - £289m when Extended Producer Responsibility is fully operational, reducing to £251m in 2032
 - Litter and refuse management costs, including bin and ground litter - £200m for the first year

9. Payments to LA's for Waste and Recycling Management

- 9.1. Proposals are for modulated fee revenues to be paid to LA's by the Producers to support additional collection of materials, upgrade recycling infrastructure and reimburse revenue losses from DRS under "necessary costs"
- 9.2. The basis of payments to Local Authorities to manage the waste is termed "full cost recovery" and the intention is to have the first phase of EPR established in 2023 which would enable "full cost recovery" payments to local authorities to be made from October 2023.
- 9.3. The consultation sets broad principles underpinning the implementation of payment mechanisms. These include the scope of necessary costs which include the following activities:
- Operational costs to collect, manage and dispose of packaging waste such as direct vehicle, staff, and container costs (capital and revenue) for all collection methods (household and commercial waste kerbside
 - Bring banks

- HWRCs
 - Litter management
 - Maintaining and operating depots, transfer stations and other facilities required to support collection and disposal of packaging
 - Costs associated with transportation, sorting, sampling, processing and the preparation of packaging waste for recycling, reuse and/or disposal (capital and revenue expenditure)
 - Income received through the selling of materials to be netted-off (perhaps using a published indices)
 - Maintenance of capital items above
 - Associated overheads (e.g. HR, IT financial services) and materials marketing costs
 - Support costs in achieving scheme outcomes and targets, including communications and provision of public information on waste prevention and recycling, efficiency reviews, data gathering and reporting, performance incentives, and supporting local authorities in contract negotiations and variations with service providers.
- 9.4. The consultation proposes that necessary costs that LA's incur will be met through delivery of 'efficient and effective' services. However, it is not clear exactly what this means other than the proposals set out intentions for services to be designed and delivered around good practice.
- 9.5. Producers should not be expected to pay for what the Government terms "poorly designed or implemented services". However, in doing so necessary costs will account for geographic, socioeconomic and other factors that influence cost and performance. There are proposals that "family groups" already in existence are utilised to dictate the system of payments which will be based on benchmarking rather than actual cost approaches.
- 9.6. As a result of this, there is a risk that some Local Authorities may lose out financially if the modelled costs are lower than actual costs when the "family group" does not recognise fully the differing demographics, for example a London Borough versus a peer based in a different part of the Country.
- 9.7. There is also a risk on funding if the collection systems are not efficient and therefore are higher than benchmarked costs of services.
- 9.8. If an authority performs below its benchmarked performance then it will receive less than its full payment (the Government proposes a limit of 80%). However, the consultation sets out proposals for provision of support through unallocated payments to those failing to meet its performance benchmarks as well financially rewarding those who outperform their benchmark.
- 9.9. It is proposed that any costs paid will be net of income from the sale of recycling (the value based on the monthly or quarterly application of published indices). This may not reflect the full net cost recovery and therefore may leave LA's in deficit. Payments could be made a year in arrears on a quarterly basis

9.10. The definition and scope of necessary costs excludes some costs all of which apply to the Council, for example:

- Additional disposal costs
- Additional procurement costs
- Costs associated with waste compositional change
- Transitional costs for service changes

10. Payments to LA's for Litter Management

10.1. There is little detail on the calculation for used for litter payments except it will be linked to cleanliness standards. It is recognised that the data reporting on cleanliness standards needs to improve to understand a baseline and ongoing situation. The consultation does refer to payments being linked to "Litter Management Strategies".

10.2. In line with the waste and recycling payments, Local Authority responses have stressed the need to target funding for need for improvement as well as rewarding success

10.3. Other bodies such as litter authorities and charities may be brought into scope (i.e., National Trust) and it is important they are not held to lower standards or have costs calculated on an advantageous basis

10.4. There is no mention of enforcement within the consultation which will be needed for high compliance rates and this has been raised as a significant risk to achieve the EPR requirements across LA responses.

11. Payment to Businesses

11.1. Payments for packaging waste collected from businesses are proposed from 2024 and there are currently three proposals for payment mechanisms for packaging waste collected from businesses:

- A compliance based scheme based on a per tonne payment administered by a single body
- A compliance based scheme based on a per tonne payment administered by compliance schemes
- A "free bin" where all businesses would be entitled to free collection of packaging waste.

11.2. The views of local government and some of the other stakeholders are crystallising in support of an alternative 'Option 4'. At its core it involves Waste Collection Authorities being responsible for the collection of packaging waste for recycling through a 'free bin' system from small and micro-businesses in their area with the option for larger businesses to join this at their discretion (otherwise they would access the free bin system delivered by another provider). Within the consistency consultation there are

proposals around zoning/franchising and, potentially, direct/localised business and it is felt this would dovetail in well.

12. Communications

- 12.1. The consultation document does not define exactly what communications support will be available, however it is mentioned as a “necessary cost” thereby it is likely to receive an element of funding
- 12.2. Only producers who are paying waste management costs are likely to contribute to communications campaigns and it is likely that campaigns will need to follow national (and possibly local) guidance, for example WRAP iconography.
- 12.3. The communications element of the consultation is strongly linked to the labelling proposals and support is generally for a single scheme due to its ease of use for consumers. Officers have stated the need for labelling to be clearly defined to avoid confusion amongst residents, i.e. recyclable, not recyclable (for example OPRL scheme)

13. Data

- 13.1. It is recognised by Government that a detailed understanding of how much obligated packaging is put on the market and in which stream (recycling or residual waste) is required. This includes collection and disposal services/facilities for households and businesses served.
- 13.2. Waste composition analysis vital to determine packaging quantities and proportions and up to date data is not available to all LA's (included Haringey). Businesses generally have even less waste compositional data. Local Authorities have voiced this need for significant compositional data sampling to allow for accurate payments accordingly.
- 13.3. It is not clear exactly what data reporting system will be used except that it will need to be provided to the Scheme Administrator through a “fit for purpose” system. There is a view that it is likely to mirror the “Waste Data Flow” system

14. DRS

- 14.1. A Deposit Return Scheme (DRS) for drinks containers was proposed by the Government in the Resources & Waste Strategy (RWS) of 2018 and enabling powers for the introduction of a DRS are included in the Environment Bill.
- 14.2. A DRS will be a form of Extended Producer Responsibility (EPR) which comes from the EU's Circular Economy Package and the UK Government's Resources & Waste Strategy.
- 14.3. The principle aim of the DRS is to collect recyclable drinks containers through a redeemable deposit system. All retailers of drinks in in-scope containers will be required to take back empty containers from consumers and give them back their deposit (noncash); this will include small ‘corner-shops’ as well as major retailers by

hosting a return point (e.g. via reverse vending machine (RVM) or manual return points) and refund the deposit fee.

- 14.4. The consultation summarises proposals and options for these reforms and posed 78 questions for consultees to consider.

15. Material Scope and Targets

- 15.1. The scope of the scheme is to capture PET plastic bottles, glass bottles (optional) and steel and aluminium cans through incentivising return via a deposit on the container. HDPE bottles, beverage cartons, sachets and pouches are excluded and disposable cups form part of the later EPR regulations as set out earlier.
- 15.2. The value of the deposit is out for consultation and whether it is an 'all in' scheme - containers up to 3 litres (currently preferred option for Wales) or an 'on the go' scheme – containers up to 750ml remains undetermined for England and Northern Ireland now. There are also options for the inclusion or exclusion of multi packs.
- 15.3. The consultation sets out a cost benefit analysis and benefits as well as the disadvantages of each scheme and asks for responses to support the analysis and state what our preferred option would be and why we have concluded that. The Council has supported an "all in scheme" as it is deemed less confusing for residents as well as being easier to manage in terms of capture from litter.
- 15.4. There are no recycling targets as such within the proposal, instead the onus is for the Deposit Management Organisation (DMO) to achieve a 90% collection rate after three years from introduction. The DMO will be legally obligated to provide evidence that all materials collected through the DRS have been passed onto a reprocessor.

16. Administration and Funding of the Scheme

- 16.1. A Deposit Management Organisation (DMO) will administer DRS in England, Wales and Northern Ireland and will be paid for by the drinks container industry. The Government proposes that the DMO is financed by a combination of: a) the income it receives for selling recyclable containers to reprocessors; b) the fees it charges to producers; and c) the proportion of deposit income that is not redeemed by consumers.
- 16.2. The consultation asks for feedback on the approach to funding the scheme, particularly around the unredeemed deposits and seeks views on the amount the deposit should be set at. Point C in 2.1 is likely to be the responsibility of LA's and therefore LA's have voiced the need to ensure any such costs are met accordingly through the EPR.
- 16.3. The consultation proposes that the DMO will be held accountable for the scheme using a combination of regulations, the tender process to appoint the DMO and a series of key performance indicators. The consultation asks for feedback on contract length for the DMO, the scope within the tender specification and contract management

17. Regulation

- 17.1. It is proposed that the overall scheme will be regulated by the Environment Agency but that the retailer's compliance will be overseen by Local Authority Trading Standards Officers.

18. Deposit Schemes and Collection from LA Kerbside Services

- 18.1. The consultation details proposals for retailers who sell in scope drink containers to be obligated to accept returns of in scope materials by hosting a return point, most likely via a reverse vending machine or through instore returns.
- 18.2. In relation to material not collected through these systems and that remain in kerbside collection systems, there are three options proposed within the consultation:
- Do Nothing - LA's redeem DRS deposits from containers collected in their waste streams
 - The DMO makes payments for deposit return scheme containers appearing in all local authority waste streams (Like EPR) plus any deposits (supported)
 - Hybrid - DMO pays a deposit value on containers that are returned and any additional scheme material in LA waste streams is covered under option 2.
- 18.3. The Government's preferred option is option 2 to be taken forward for final scheme design and this is generally supported by Local Authorities as being the most effective way to ensure there are no financial losses for authorities as well as ease of use for the residents.
- 18.4. The consultation outlines digital solutions for residents to scan items into their kerbside collections as to recover their deposit, but further clarity is required on how this would work in terms of items not being scanned or impacts on residents who do not have the technological ability to do this. The consultation considers how to minimise fraud by ensuring that once containers are scanned and returned, they lose their deposit value and cannot be returned again.

19. Potential Impacts on Local Authorities – Kerbside Collections

- 19.1. Cartons are currently excluded due to concerns on infrastructure, but these make up a significant element of take away products. If the scheme is material based rather than product based it may lead to confusion and contamination of waste streams. It is unclear how contamination will be managed.
- 19.2. The material scope may lead to increase of materials not included – i.e. pouches etc being used by producers to avoid the scheme. Currently these are not included in Haringey's recycling service and therefore may negatively impact on residual waste tonnage.
- 19.3. The glass in option may impact on current tonnage driven recycling rate resulting in decreases in recycling rates. There is a lack of clarity on whether recycle tonnage captured by DRS will be reported back to LA's which impacts on London Environment Strategy achievements

- 19.4. The value of what local authorities deliver to sorting facilities (MRFs) may be reduced by the materials being removed and this may lead to a negative cost impact although the impacts of this are unknown at this stage

20. Possible Impacts on Local Authority Street Scene

- 20.1. The Impact analysis makes a correlation between reduction in litter and cost savings for street cleansing which may not be practical as there is still a given area to cover albeit it quicker.
- 20.2. For take back schemes in store, there is a potential storage issue in areas with insufficient space which is particularly relevant to a borough like Haringey. "Bin Diving" from these bins (and household bins) may become an issue as people seek out containers for money.
- 20.3. The installation of the proposed reverse vending machines (RVMs) under permitted development rules; particularly with a scheme for containers up to 3ltr, such RVMs could be very large
- 20.4. There are concerns about street scene arising from the RVM's from fly tipping as well as placement on pavements that may already be congested

21. Possible other Impacts on Local Authority Resources

- 21.1. It is proposed that Local Authority Trading Standards Officers will be responsible for enforcing legislation for retailer requirements and this is a resource implication for LBH
- 21.2. If RVM's require planning permission, there is a possible resource implication for approval processes.
- 21.3. There is a likelihood that complaints/queries about the scheme are directed back to the Council.

22 Consistency In Household and Business Recycling

- 22.1 The first consultation on Consistency was run in the spring of 2019 and they are linked to the EPR/DRS regulations with timescales of implementation from 2023 – 2031. The main aim of the regulations is to establish more consistent recycling collections across England by standardising services.
- 22.2 The regulations focus on the range of materials that local authorities collect and the design of collection systems, as well as some issues around frequency and charging whilst for businesses, the Consistency proposals also extend to making the segregation of certain recyclable materials mandatory.
- 22.3 The regulations have a requirement for the separate collection of glass bottles and jars, paper, card (exc. disposable cups), plastic bottles, pots, tubs, trays, metal drinks and food cans.
- 22.4 The consultation sought views on the inclusion and necessary transitional measures required to collect additional materials including aluminium foil, trays and

tubes, aerosols, jar/bottle lids, cartons (in plastics stream) and plastic films inc. carrier bags (by end of 26/27). Further materials have been looked at for inclusion i.e. WEEE, textiles and batteries through the regulations when necessary tests (i.e. infrastructure and markets availability) are met.

22.5 On the issue of residual waste frequency, the Government is not making a firm commitment to any policy direction at this stage. However, the frequent use of the term “efficient and effective systems” in the EPR consultation, appears to suggest that fortnightly residual waste collections (alongside weekly food waste and whatever frequency of dry recycling collection is appropriate) may become the default for any legislation arising from this consultation.

25. New Burdens Funding

25.1 There is a continued commitment to fund the net additional cost to local authorities of the new statutory duties placed on them in line with new burdens guidance. New burdens are defined as any change in a central Government policy or initiative that imposes a net cost on local government and could lead to an increase in council tax

25.2 Whilst there is a commitment to fund net additional capital costs (for example containers, vehicles), and transitional costs such as communications and re-routing vehicles, to implement the new consistent collection measures, ongoing operational costs are mentioned in some places but not others and further clarity is required to understand the funding possibilities.

26 Separate Collections

26.1 The Government is legislating through the Environment Bill to require local authorities to collect glass, metal, plastic, paper and card separately, with provisions for guidance to be issued that provides further details about this requirement.

26.2 There already exists (from 2011 regulations) a statutory requirement for the different recyclable streams (paper, plastic, glass etc.) to be separately collected from one another, except where it is either not necessary to maintain material quality, or where not technically, economically, or environmentally practicable to do so. This concept is generally known as TEEP.

26.3 The TEEP requirement created concern at its inception around 2015 when it came into force but has not been followed through owing to a lack of funding for its regulation.

26.4 The Environment Bill and Consistency proposals resurrect the TEEP requirements but alter the environmental practicability assessment to instead be one of “no significant environmental benefit”. There is also likely to be tests on practicability and economically practicability. Under the 2015 TEEP, it was relatively simple to prove that a service was not “practical” or “economical”, for example having a source

separated collection for urban areas where space is an issue and that offering more frequent collections to reduce the overall space required would then not be “economically practical”. However, with potential new burdens funding available, previous exclusions may be more difficult to justify.

- 26.5 The Government wishes to standardise the assessment procedure and is proposing to provide a template for written assessments in statutory guidance, as well as details on the type and standard of evidence needed to support such an assessment.
- 26.6 It is also proposed to consider how to reduce the burden on both local authorities and the regulator (Environment Agency) through allowing multi-authority assessments where local circumstances (treatment infrastructure) have resulted in the use of the same collection systems.

27 Food Waste

- 27.1 As expected, the Government has used the consultation to set out its plans for introducing a requirement for local authorities to provide at least a weekly separate collection of food waste from households by 2024/25 at the latest (subject to contracts)
- 27.2 The Council already provides this service; however the proposals are likely to include flats above shops which is likely to present challenges in urban areas in terms of placement and contamination. The Government has recognised that there are barriers to providing this type of service for some properties but has not allowed for any exemptions on the requirements because of this. The costs for setting up separate food waste collections may be covered by New Burdens funding (outlined below), which will be based on benchmarking and modelling. Ongoing operational costs are unclear at this stage.
- 27.3 Treatment is expected to be by AD rather than IVC or MBT which is in line with the Council’s current arrangements through NLWA.
- 27.4 Biodegradable plastic collections are not required but collected separately where collected and caddy liners promoted as good practice though unlikely to be requirement

28 Garden Waste

- 28.1 The Environment Bill requires a separate proposal for a minimum fortnightly garden waste service with a maximum 240litre wheeled bin service only to homes with gardens from 2023/24. There is no mention of the growing season which indicates it would be a year round service.
- 28.2 The Government had previously consulted on introducing a requirement for free garden waste collections for householders which has received mixed support for universal free collections in the first consultation and low support from local authorities.

- 28.3 The consultation provides updated costs and benefits presented include an estimated 5% recycling rate increase through the provision of free garden waste collections.
- 28.4 Views are sought on the carbon and recycling benefits of a free fortnightly service, as well as alternative methods for managing garden waste that could operate alongside or instead of the proposed free service, for example charges for increased collection or capacity.
- 28.5 Local authorities are likely to retain the provision to charge beyond this (e.g. increased collection frequency or increased capacity) and the consultation does ask for views on alternative models to free of charge services, for example setting a maximum rate for the charge (WRAP suggests £18-£30) and/or promoting home composting beyond the current estimated rate of 20%.
- 28.6 It is not clear if the new burdens cover all costs and any potential loss of income where charging is in place for the collection (but not treatment) of household garden waste which is allowable under the Controlled Waste Regulations 2012.

29 MRF Regulations

- 29.1 There are proposals to amend Environmental Permitting Regulations 2016 to increase the amount of sampling undertaken at MRFs with more frequent and robust audits as well as better guidance on target materials. This links to the increased data requirements that the EPR proposals will create.

30 Non Household Municipal Waste

- 30.1 The proposals have the same requirements as householders to segregate recyclable waste for separate collection with the same scope of materials (ex garden) and the same timescales though there is a shorter transition for plastic film (24/25) and possibly also food waste.
- 30.2 There are also the same proposals in terms of a requirement for TEEP assessment by the waste collector (with input from producer) although there is a proposal for a blanket exemption or two year delay for micro firms (<10 FTE). The TEEP requirement may be a significant burden for SME's however the consultation proposes that WRAP will develop online business support and that there could be a collaborative approach – i.e. BIDS between businesses. There are also proposals for franchising/zoning with the local authority providing possible administration (possibly business support) which may represent a new burden and therefore funding may be available.

30.3 The proposals will create a requirement for more commercial recycling services to be provided across the country. This, along with the EPR proposals are likely to mean significant changes to the commercial waste market. The local impacts of these changes are harder to predict than for the household waste proposals, given it is not clear how the commercial waste market will change however it is likely that the council will need to consider investment to expand commercial waste services both in area coverage and material scope provision. Again, it is not clear at this stage how funding will be available to undertake this.

31. Other Proposals

- There are also proposals to consult on non-binding targets and carbon based metrics
- The Recycling Credits regime may be amended or abolished through the introduction of EPR payments which may impact on community groups through NLWA funding
- Bin colour standardisation has been abandoned
- There is some wording on communication and implementation though little detail is provided on how this would work in practice

32 Summary

- 32.1 Arising legislative changes from these consultations have the potential to change the landscape of the waste industry significantly. The timescales for implementation are from 2023 but full impacts of all three consultations are not fully known yet and Officers will report back to Council as further information is released.
- 32.2 The current Waste Management contract with Veolia expires April 2025 and a service Review is starting imminently which will review the natural end of the contract and assess viability of a number of options. Legislative changes resulting from these consultations will feed into that process to determine the methodology to future proof waste and recycling management collection systems for the council.

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Report for: Environment and Community Safety Scrutiny Panel

Title: Implementation of recommendations from the Review into Blue Badges and Supporting Better Access to Parking for Disabled People.

Report authorised by Stephen McDonnell, Director of Environment and Neighbourhoods

Lead Officer: Ann Cunningham, Head of Highways & Parking
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Ward(s) affected: All

Non-Key Decision

1 Describe the issue under consideration

- 1.1 To provide an update on implementation of the recommendations of the Environment and Community Safety Scrutiny review – Blue Badges and Supporting Better Access to Parking for Disabled People agreed in 2020.

2 Cabinet Member Introduction

N/A

3. Recommendations

- 3.1 That the Environment and Community Safety Scrutiny Panel notes the content of this report.

4. Background

- 4.1 Parking provision, including the 'Blue Badge' scheme, makes a considerable contribution to the independence and social inclusion of disabled residents. The Blue Badge scheme provides a range of on-street parking concessions, providing free parking without a time limit in otherwise restricted environments. These concessions exist to help those who qualify under the scheme to park close to local services and facilities. In addition, Local authorities are required to provide disabled parking bays that may be used solely by holders of Blue Badges.
- 4.2 The progress being made in implementing the recommendations of the Environmental and Community Safety Scrutiny Panel is positive. The Covid-19 pandemic presented challenges to day-to-day service delivery. It also hindered the delivery of some new developments. Mobility assessments which account for approximately 60% of Blue Badge applications, ceased during lockdown periods, where guidance prohibited face to face contact. This resulted in some Blue Badge applications being put on hold.

Whittington Health Trust colleagues assisted with desk-based assessments, where medical evidence permitted eligibility to be determined. Unfortunately, this only applied to a small number of cases. The remaining 40% of applications meeting the automatic qualification criteria, were processed as normal by Council staff.

- 4.3 Progress on implementation of each recommendation is attached as Appendix 1. In summary, a new Blue Badge Case Management System (CMS) went live on 12 August 2021. This introduced online payments, as well as integrating communications to customers at relevant stages of the application process - for example, requests for further information, referral for assessment, and request for payments.
- 4.4. 130 out of the 1700 disabled parking bays are currently live on the ground as dedicated disabled bays. The majority of these dedicated disabled parking bays were provided to new applicants, with the conversion of some existing disabled parking bays. It is expected that demand for the conversion of existing bays will increase as awareness of the service continues to be raised. A further 43 dedicated disabled bays are being progressed for delivery.
- 4.5 The recent introduction of map-based traffic management orders provides an effective monitoring tool to ensure that conversion rates of those bays will not impact on wider disabled parking provision in areas of high demand, including town centres. This tool has allowed the service to identify potential redundant disabled parking bays. The service will seek to remove those bays subject to consultation bringing the infrastructure up to date.
- 4.6 The new parking IT system offers Blue Badge holders who reside within the borough a free virtual residential permit for their home Controlled Parking Zone (CPZ). Online and paper applications are available. Online applications automatically validate a customer's residency and Blue Badge status, with a free permit issued instantly. This was based on arrangements in two neighbouring boroughs, replacing the previous 'Companion Badge' scheme. The Companion Badge granted exemptions boroughwide.
- 4.6 Concerns have been raised by existing Companion Badge holders that limiting the new offer to the individual's home CPZ does not grant the protections required. As a consequence, this new scheme is being reviewed through the normal governance arrangements.
- 4.7 Many discussions have taken place with Whittington Trust colleagues to establish how the mobility assessment process can be streamlined and improved. While those discussions have not yet concluded, some changes are being implemented. Further improvements will be delivered in the near future, now that they have caught up with the backlog of assessments.
- 4.8 Improvements have been made to communications with Blue Badge holders, including new applicants. This includes a more detailed explanation of the mobility assessment process. This allows applicants to understand the need for the assessment and arrive better prepared, in particular, bringing along any required medical information. This is expected to improve the experience for applicants as well as reducing missed

appointments and the need to reschedule meetings where the necessary information is not available.

- 4.9 There is an ongoing development plan, as set out in the Disabled Parking Action Plan approved by Cabinet in March 2021. An additional £200k investment was agreed through this process to fund a programme to extend the length of disabled parking bays to meet statutory requirements, making them more useable by those needing wheelchairs or other walking aids.
- 4.10 These extended disabled parking bays are being considered in batches, in tandem with controlled parking zone (CPZ) consultations to provide efficiencies in resourcing. The first batch consists of 22 bays in 4 CPZs – Alexandra Palace, St Luke's, Fortis Green and Tower Gardens. The statutory consultation for these ended in mid-August, so a report is currently being finalised and a formal decision is due to be taken in September.
- 4.11 It should also be noted that the Council has successfully implemented the extension to the Blue Badge scheme to include people with 'hidden disabilities', such as people who are autistic, have a learning disability, dementia or a mental illness. This involved a smooth implementation, with 450 Blue Badges issued under this category since 2019.

5 Contribution to strategic outcomes

5.1 Disabled parking facilities supports two key Themes within the Borough Plan 2019-2023:

- People Theme: A Haringey where strong families, strong networks and strong communities nurture all residents to live well and achieve their potential. Disabled parking facilities makes a considerable contribution to the independence and social inclusion of disabled residents.
- Place Theme: A place with strong, resilient & connected communities where people can lead active and healthy lives in an environment that is safe, clean and green. Disabled Parking facilities enables access to those with severe mobility issues or other conditions who need to travel by car.

6 Statutory Officers' comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

Finance

There are no specific Finance issues arising from this report.

Procurement

There are no specific Procurement issues arising from this report.

Legal

There are no specific Legal issues arising from this report.

Equality

There are no specific Equalities issues arising from this report.

7. Use of Appendices

Appendix 1 - Scrutiny Recommendations Update September 2021

8. Local Government (Access to Information) Act 1985

- Disabled Parking Action Plan March 2021 Cabinet report.
- Environment and Community Safety Scrutiny Review – Blue Badges and Supporting Better Access to Parking for Disabled People

Scrutiny Recommendations Update September 2021

Recommendation	Status	Notes
<p><u>Disabled Bays and Provision of Dedicated Disabled Bays</u></p> <p>That Cabinet undertake to monitor the implementation and conversion of dedicated disabled bays going forward, with particular focus on the impact on the overall availability and distribution of disabled parking bays.</p>	Monitoring processes in place	<p>The dedicated disabled bay provision is now widely communicated, encouraging take up, with conversion levels being monitored. While the conversion of those bays is unlikely to directly impact on non-dedicated disabled provision in places of high interest, including town centres, monitoring will ensure that there is no gap in provision.</p> <p>The recent introduction of map-based traffic management orders makes this process easier and more efficient. This involved a full survey of all parking bays and restrictions borough wide prior to implementation. This now provides a full inventory and map of all disabled bays – at dedicated and non-dedicated locations. This allows officers to easily keep abreast of any changes on a street-by-street basis.</p>
<p>That Cabinet reconsider the eligibility criteria for disabled bays and the use of automatic entitlement based upon whether the person is in receipt of higher rate/enhanced rate benefit payments.</p>	Complete	<p>The eligibility criteria for dedicated disabled parking bays has been extended to include an entitlement subject to further assessment. This brings the assessment process for dedicated disabled parking bays more in line with the National Disabled Blue Badge scheme. Where required applicants with severe mobility restrictions may be assessed by expert assessors to determine eligibility. Those assessments are undertaken by the expert assessors who deal with Blue Badge assessments and are structured in a manner that covers eligibility for both services, where possible reducing bureaucracy and the need to undergo multiple assessments.</p>
<p><u>Applying for and renewing a Blue Badge</u></p> <p>That Cabinet undertake to explore ways of ensuring that online payments can be made</p>	Complete	<p>The new parking management IT system (PMIS) is largely implemented, with one implementation yet to be complete. This included a new Blue Badge Case Management System (CMS). The CMS provides for online payments as well as gaps in other administrative processes that sit between the Department for Transport's (DfT) Blue Badge system (which accepts the application) and the production of the Blue Badge at the latter stage of the process.</p>

Recommendation	Status	Notes
for Blue Badges. At present the £10 administration fee can only be paid via cheque which causes unnecessary delays. This may require engaging with the DfT and seeking changes to the government website. It is suggested that Local Members of Parliament could be engaged on this issue and their influence sought.		
That provision be put in place for Blue Badge applicants to be able to speak to the Concessionary Travel team directly.	complete	This arrangement is now in place and the telephony system allows applicants direct access to the officers dealing with their applications. This is in addition to the main Council contact number and set options to the Blue Badge team which allows an applicant to speak with the team. There is an online contact form on haringey.gov.uk that also offers direct online contact to the Concessionary Travel Team.
That Cabinet explore ways in order to make the process of applying, renewing and being assessed for a Blue Badge more streamlined and less disjointed. Specifically, the Panel would like Cabinet to consider:		

Recommendation	Status	Notes
Whether regular updates could be provided to applicants on the status of their application?	Complete	The Blue Badge CMS integrates communications to customers at relevant stages of the application process, including where the status of their application changes (for example, request for further information, referral for assessment, request for payment etc.)
Whether this could be automated?	Complete	
Ensuring that applicants can upload documents online.	In place	Online document upload for the initial application is provided through the DfT solution, with these applications and all associated uploads being received in the CMS for processing. Further future development of the CMS solution may include an option for upload of any further documents should this be necessary for the customer. At present, the option to upload documents after the initial application is offered through the Concessionary Travel online contact form on haringey.gov.uk
That provision of an automatic renewal reminder email/letter to Blue Badge holders at the appropriate point, be explored?	Complete	The new Blue Badge CMS solution provides the functionality to automatically send renewal reminders to customers by post and email. This is configured to send reminders to customers 12 weeks in advance of the date of their badge expiry. This provides sufficient time for the customer's application to be reviewed and any assessments to be carried out.
<u>Enforcement and Blue Badge related crime</u> That the Council should prioritise tougher enforcement of Blue Badge fraud in order to ensure that those will genuine mobility issues are able to use their vehicles. Training should be provided for Enforcement officers and		The service has undertaken enforcement of the fraudulent use of Blue Badges for several years. Those operations are led by service experts supported where necessary by the police and Civil Enforcement Officers (CEOs). Those operations involve proactive onsite investigation of Blue Badge usage, as well as the investigation of irregularities reported by CEOs and residents. CEOs play a role in identifying potential abuse. The functionality of the new IT system allows validation of Blue Badges using the handheld software, which will link into the national database. It is appreciated that not all disabilities are visible, so adopting an appropriate degree of sensitivity in handling such matters is therefore sought.

Recommendation	Status	Notes
processes put in place so that any Blue Badge identified by a CEO was inspected and the badge holders' details cross referenced with the back office for possible misuse. The Panel heard evidence from Bromley that this could take as little as 30 seconds.		While identification of the abuse can be done by CEOs, dedicated resources are required in the back office to deal with all follow up actions which can be quite complex. The new operating model being implemented as part of the parking transformation programme will increase capacity across the service and support increased enforcement in this area.
Consideration should be given to how the Council, working with police and partners, could support the rollout of theft prevention devices for Blue Badges.	Ongoing	The service is raising awareness of the availability of theft prevention devices and how they may be purchased, as part of an overall campaign to raise awareness of the scheme, as well as reducing abuse and its associated crime.
The Panel received evidence that these were particularly effective and cost between £30 & £40. Cabinet should consider whether providing these was cheaper than the administration costs associated with replacing a stolen Blue Badge.	Not agreed	An analysis of costs of providing those devices was undertaken and it would exceed available service budgets. The Blue Badge service is not a means-tested service and, as a consequence, many badge holders will have the resources required to purchase those devices themselves if required.

Recommendation	Status	Notes
That the Council works closely with the police to reduce proliferation of Blue Badge related crime. The Panel received evidence that Blue Badge theft from vehicles has risen over 600% in the last three years. It is suggested that the Community Safety Partnership could examine this issue as part of its work programme for 2020/21.	Not agreed	The Council already works with the police on misuse of Blue Badges, and this is done in the context of many priorities. Investigating Blue Badge theft does not connect with the terms of reference of the Community Safety Partnership as its role is mainly strategic. However, there is the intention to establish a quarterly strategic partnership forum that will include police representatives would also serve to ensure that the impact of Blue Badge-related crime is continually raised.
That the Council explores the feasibility of issuing virtual permits instead of Companion Badges. Cabinet should also ensure that provision of paper applications is retained on some level in order to ensure residents without access to IT are not unduly disadvantaged.	In place	<p>The new parking IT system offers Resident Blue Badge Holder Permits – a free virtual permit for Haringey Blue Badge holders to park in their home Controlled Parking Zone (CPZ). Online and paper applications are available. Online applications automatically validate a customer's residency and Blue Badge status – where they are automatically validated, their free permit will be issued instantly. Paper applications will be available to those who may have problems with digital access – with virtual permits issued and the customer notified by letter.</p> <p>There have been complaints from existing Companion Badge holders that limiting this new concession to the individual's home CPZ does not grant the protections required – the Companion Badge could be used borough-wide. Those concerns are being considered through formal processes with a view to extending concessions, but with the necessary checks and balances ensure the integrity of the scheme.</p>
The Cabinet Member should engage with other Boroughs that have	Ongoing	The Council is represented at the London Councils Transport Executive Committee (TEC). The TEC also provides the opportunity to seek consistency in transport issues.

Recommendation	Status	Notes
<p>implemented virtual permits to see what lessons can be learnt. Engagement should also be sought with the Mayor's Office and London Councils to encourage adoption at a pan-London level and explore the feasibility of having a more integrated system across London.</p>		<p>The parking service also collaborates and shares experience with other boroughs and this is reflected in the approach to delivery of the new parking IT system. In particular, the new Resident Blue Badge Holder Permit was based on arrangements successfully implemented in two neighbouring boroughs, who limit the virtual concessions to the individual's home CPZ.</p>
<p><u>Correspondence and Communication</u> That a commitment is given that the Council will carry out a review of the letters and communications that it sends to residents to ensure that they are clear, courteous and without the use of intimidating language</p>	Complete	<p>Following the outcomes of the Scrutiny report, all correspondence to Blue Badge residents were immediately reviewed and tweaked. Additional letters were introduced to explain the assessment process and why it is required. The service also kept applicants waiting for assessments updated through the pandemic.</p> <p>All communications to customers sent as part of the Blue Badge or permits applications process have been reviewed and updated as part of the implementation of the new parking management system.</p>
<p>That the Council implement provision for residents to report disabled bays that were no longer in use and that processes are put in place for adequate</p>	Processes in place	<p>The removal of unused disabled parking bays is subject to statutory consultation and therefore carried out as part of a managed process. In many cases, the statutory consultation can identify issues, which need to be resolved or overcome in some manner, before proceeding. This makes it quite difficult to give clear timelines for resolution.</p>

Recommendation	Status	Notes
monitoring of disabled bays and whether they were being used. Once a bay is identified as being unused there should be a clear timeline for its removal. A campaign should be launched through Haringey People and our website to 'report an unused disabled bay'.		However, to bring existing infrastructure up to date, an analysis of disabled parking bay provision and Blue Badge issue by street has been concluded. This analysis was conducted using the new map-based order system. This has identified disabled parking bays in residential streets with no current registered Blue Badge holders, suggesting that those bays are no longer required. Removal of those bays will be sought, subject to the outcome of statutory consultation, which gives any resident the opportunity to object if necessary.
That the Council should send out a booklet of key information to residents as soon as they are assessed as needing a Blue Badge.	Complete	The national Blue Badge information booklet is provided to each new applicant to ensure a comprehensive understanding of the scheme. Local concessions are set out in the letter that agrees qualification for the scheme.
That the Council explore ways in which an automatic reminder could be issued, along with the existing information given to the next of kin, to cancel a Blue Badge when a death is registered	Complete	The Council does not hold next of kin data on Blue Badge holders. The Council does however subscribe to the Government's 'Tell Us Once' service, which allows relatives registering a death to notify several services at that one point of contact. Those notifications are also used to cancel Blue Badges. It may also be helpful to note that the maximum number of years that badges are valid is three years.
A communications campaign should be implemented across the Blue Badge agenda	Ongoing	This is included as part of the wider Highways and Parking service communications plan.

Recommendation	Status	Notes
which clearly sets out the Council's enforcement message. It is suggested that disability access representatives and the Council's Equalities Steering Group should be involved in developing this campaign and that consideration should be given to highlighting awareness around the fact that not all disabilities are visible.		
<u>Health Assessments for Blue Badges</u> That consideration should be given on to how to minimise delays within the assessment process, including ensuring that assessment bundles can be transferred to Stuart Crescent electronically.	Complete.	Those files are now transferred electronically.
That the Council should work with Stuart Crescent Health Centre to ensure that the current 5-minute deadline for late arrivals was	Complete	The appointment letter issued by the Whittington Health Trust has been reviewed and fundamentally changed. Applicants arriving slightly late are not refused their assessment. Like all Whittington Trust services, appointments are scheduled according to available resources. There may be occasions where appointments need to be rescheduled due to lateness, where seeing that applicant will impact on all other scheduled appointments. In saying that, there are very few occasions where this has occurred. Applicants are also

Recommendation	Status	Notes
extended and a greater degree of flexibility afforded to applicants, given the mobility levels of the people being assessed and the lack of available parking facilities.		able to change and reschedule appointments they unexpectedly find themselves unable to attend at the arranged time.
Cabinet should work with the Whittington Trust to ensure that residents were provided with an alternative date when an appointment was missed.	Complete	A main consideration for the Trust is to reduce missed appointments. This service is being conducted within available Trust resources and missed appointments do present challenges. Blue Badge holders may change and reschedule appointments if required and a missed appointment should therefore only arise in exceptional circumstances. The revised appointment letters do encourage applicants to reschedule when required. Applicants who do miss an appointment are offered an alternative date.
That Cabinet ensures that monitoring of the current 23-day timescale for applications to be processed is undertaken.	Ongoing	We currently aim to process all completed applications within 30 working days. This allows 23 days for face-to-face mobility assessments to be conducted. This exceeds the DfT guidance which allows up to 12 weeks for application handling. We have done much work with the Trust to understand why the current 23-day deadline is missed on some appointments. There are varying factors, which includes applicants arriving without the necessary information, and the assessment needing to be rescheduled and where appointments are missed and need to be rescheduled. The Trust has therefore been worked with to ensure applicants understand the process and come prepared. This will improve the customer experience, as well as avoiding delays where appointments need to be rescheduled.
That Cabinet also explores recommissioning of the current contract to provide assessments for discretionary Blue Badge applications as it was last	Complete	<p>The Council delivers this service through a partnership arrangement with the Whittington Health Trust. This is not a formal tendered arrangement, but a negotiated arrangement with costs borne by the Trust.</p> <p>Market research was conducted to establish the private sector offer. This was established that this would require significant investment with little overall benefit.</p>

Recommendation	Status	Notes
<p>done over 10 years ago. The Panel recommends that consideration is given to commissioning additional providers for the assessment process for greater flexibility and distribution across the borough. The Council should explore ways of ensuring that those residents have a choice of which centre they attend and that there is some provision in the west of the Borough as well as in Tottenham. The Panel suggests that recommissioning this service could potentially provide an opportunity to speed up the assessment process and minimise delays.</p>		<p>The Council is working with the Trust to identify a suitable assessment centre in the east of the borough. There are no suitable sites available at present, but Whittington colleagues remain supportive. If a site becomes available, officers will work with them to offer a choice to Haringey residents. In the meantime, the Stuart Crescent centre is reasonably centrally located and is accessible.</p>



Scrutiny Review: Blue Badges and Supporting Better Access to Parking for Disabled People

A Scrutiny Review by the Environment and Community Safety
Scrutiny Panel
2019/20

Panel Membership	Cllr Adam Jogee (Chair)
	Cllr Eldridge Culverwell
	Cllr Barbara Blake
	Cllr Peray Ahmet
	Cllr Julie Davies
	Cllr Julia Ogiehor
	Cllr Scott Emery
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CHAIR'S FOREWORD

The remit of the Environment and Community Safety Scrutiny Panel is such that the options for reviews to focus on, issues to unpick and policies to test are almost innumerable. As Chair, working with my colleagues, I wanted to ensure that we focused on issues of importance to the community, issues that affected the lives of our people and issues where we could deliver real change. That vision remains my priority and will do so every day I serve as a Councillor here in the London Borough of Haringey.

There are many responsibilities of the Council to the people who live, learn and work in our community. Among those important responsibilities to the people of Haringey is the fight to ensure that our Borough – east and west – is accessible, inclusive, safe and welcoming.

Those aims and objectives underpin why we chose to look at the issue of disabled bays and Blue Badges. The application process, used by many residents in our Borough, have long been inefficient, inaccessible and in some cases, not fit for purpose. A Cabinet level decision was made in early 2019 to review a range of parking related issues in line with the new Transport Strategy. Our panel wanted to play our part and engaged with the review in as open and reflective a way as possible. At a meeting of our panel in April 2019, we heard from members of the public, officers of the council, relevant stakeholders and many others that action was needed on disabled bays and blue badges.

Since then, we have met with and seen first hand the processes and structures in London Boroughs across our capital city. We have brought residents into the Council to share their experiences, to explain their thoughts and to work together to develop a set of recommendations that will deliver real and meaningful change. And we have met with representatives of community organisations, disability charities and other bodies relevant to this matter.

The Panel is grateful to the Cabinet Member for taking the time and effort to listen to our deliberations and work constructively with us over recent weeks and months. The progress made on dedicated disabled bays that went to Cabinet in September 2019 is the first step to delivering real change and we will continue to monitor this important area in the coming weeks and months.

The real change proposed in our review will lead to a better deal for disabled people, and those who require assistance with their mobility, so that they are able to go about their day-to-day life without obstruction or inconvenience. This is an important report that deserves to be taken seriously and we have put together a set of recommendations that I hope will receive full support from the Cabinet.

I would like to thank Philip Slawther, our Clerk, for his work and support. Those thanks are extended to all the officers here at the London Borough of Haringey who have assisted us from the start of the process to the publication of this review.

Lastly, I would like to thank my colleagues on the Panel. It has been a useful,

interesting, challenging and motivating experience and I am grateful to Cllr Eldridge Culverwell, Cllr Scott Emery, Cllr Barbara Blake, Cllr Peray Ahmet, Cllr Julie Davies, Cllr Julie Ogiehor and Ian Sygrave for their individual, and combined, contribution.

Councillor Adam Jogee

Labour Member for Hornsey

Chair, Environment and Community Safety Scrutiny Panel

RECOMMENDATIONS:

1. Cabinet to give consideration as to how future Scrutiny Reviews could be best supported and common timelines agreed that allow Scrutiny to carry out its investigative work fully.

Disabled Bays and Provision of Dedicated Disabled Bays

2. That Cabinet undertake to monitor the implementation and conversion of dedicated disabled bays going forward, with particular focus on the impact on the overall availability and distribution of disabled parking bays.
3. That Cabinet reconsider the eligibility criteria for disabled bays and the use of automatic entitlement based upon whether the person is in receipt of higher rate/enhanced rate benefit payments.

Applying for and renewing a Blue Badge

4. That Cabinet undertake to explore ways of ensuring that online payments can be made for Blue Badges. At present the £10 administration fee can only be paid via cheque which causes unnecessary delays. This may require engaging with the DfT and seeking changes to the government website. It is suggested that Local Members of Parliament could be engaged on this issue and their influence sought.
5. That provision be put in place for Blue Badge applicants to be able to speak to the Concessionary Travel team directly.
6. That Cabinet explore ways in order to make the process of applying, renewing and being assessed for a Blue Badge more streamlined and less disjointed. Specifically, the Panel would like Cabinet to consider:
 - Whether regular updates could be provided to applicants on the status of their application?
 - Whether this could be automated?
 - Ensuring that applicants can upload documents online.
 - That provision of an automatic renewal reminder email/letter to Blue Badge holders at the appropriate point, be explored?
7. That the Cabinet Member should have a greater oversight of the overall process from start to finish. The Cabinet Member should receive regular performance monitoring updates from the different areas and an action plan should be developed to improve monitoring and ensure delays are minimised.
8. That the Cabinet Member undertake to arrange a quarterly strategic partnership forum with key stakeholders, including the Council, the Whittington, Police and DfT to ensure that the overall journey is streamlined and made more accessible. This

would also provide a partnership forum to address Blue Badge related crime as per Recommendation 11.

Enforcement and Blue Badge Related Crime.

9. That the Council should prioritise tougher enforcement of Blue Badge fraud in order to ensure that those with genuine mobility issues are able to use their vehicles. Training should be provided for Enforcement officers and processes put in place so that any Blue Badge identified by a CEO was inspected and the badge holders' details cross referenced with the back office for possible misuse. The Panel heard evidence from Bromley that this could take as little as 30 seconds.
10. Consideration should be given to how the Council, working with police and partners, could support the rollout of theft prevention devices for Blue Badges. The Panel received evidence that these were particularly effective and cost between £30 & £40. Cabinet should consider whether providing these was cheaper than the administration costs associated with replacing a stolen Blue Badge.
11. That the Council works closely with the police to reduce proliferation of Blue Badge related crime. The Panel received evidence that Blue Badge theft from vehicles has risen over 600% in the last three years. It is suggested that the Community Safety Partnership could examine this issue as part of its work programme for 2020/21.
12. That the Council explores the feasibility of issuing virtual permits instead of Companion Badges. Cabinet should also ensure that provision of paper applications is retained on some level in order to ensure residents without access to IT are not unduly disadvantaged.
13. The Cabinet Member should engage with other Boroughs that have implemented virtual permits to see what lessons can be learnt. Engagement should also be sought with the Mayor's Office and London Councils to encourage adoption at a pan-London level and explore the feasibility of having a more integrated system across London.

Correspondence and Communications

14. That a commitment is given that the Council will carry out a review of the letters and communications that it sends to residents to ensure that they are clear, courteous and without the use of intimidating language.
15. That the Council implement provision for residents to report disabled bays that were no longer in use and that processes are put in place for adequate monitoring of disabled bays and whether they were being used. Once a bay is identified as being unused there should be a clear timeline for its removal. A campaign should be launched through Haringey People and our website to 'report an unused disabled bay'.

16. That the Council should send out a booklet of key information to residents as soon as they are assessed as needing a Blue Badge.
17. That the Council explore ways in which an automatic reminder could be issued, along with the existing information given to the next of kin, to cancel a Blue Badge when a death is registered.
18. A communications campaign should be implemented across the Blue Badge agenda which clearly sets out the Council's enforcement message. It is suggested that disability access representatives and the Council's Equalities Steering Group should be involved in developing this campaign and that consideration should be given to highlighting awareness around the fact that not all disabilities are visible.

Health Assessments for Blue Badges

19. That consideration should be given on to how to minimise delays within the assessment process, including ensuring that assessment bundles can be transferred to Stuart Crescent electronically.
20. It is recommended that, the Council should work with Stuart Crescent Health Centre to ensure that the current 5 minute deadline for late arrivals was extended and a greater degree of flexibility afforded to applicants, given the mobility levels of the people being assessed and the lack of available parking facilities. Cabinet should work with the Whittington Trust to ensure that residents were provided with an alternative date when an appointment was missed.
21. That Cabinet ensures that monitoring of the current 23 day timescale for applications to be processed is undertaken. That Cabinet also explores recommissioning of the current contract to provide assessments for discretionary Blue Badge applications as it was last done over 10 years ago. The Panel recommends that consideration is given to commissioning additional providers for the assessment process for greater flexibility and distribution across the borough. The Council should explore ways of ensuring that that residents have a choice of which centre they attend and that there is some provision in the west of the Borough as well as in Tottenham. The Panel suggests that recommissioning this service could potentially provide an opportunity to speed up the assessment process and minimise delays.

1. Background

Introduction

- 1.1 The Panel were approached by the then Cabinet Member for Environment and the Interim AD for Environment and Neighbourhoods, who outlined proposals for the service to review a range of parking related issues in line with the Transport Strategy. The Parking Service were looking at updating a range of policies and operational practices as part of this. The impetus was a combination of a widening of existing Blue Badge eligibility criteria and opportunities arising from a scheduled upgrade to the Council's Civic IT system for parking, which would support additional online payment opportunities and maximise recovery of income from Parking Control Notices (PCNs). As part of this programme of work, it was felt that there were a number of opportunities for Scrutiny to be involved in a policy development role. Most Scrutiny Reviews are retrospective in nature and the Panel welcomed the opportunity to feed into an emerging policy area.
- 1.2 At its meeting on 30th April 2019, the Overview and Scrutiny Committee agreed to set up a review that looked into how the Council could provide better access to disabled parking services, with a particular focus on Blue Badge provision. During the Scrutiny Panel meeting on the 8th April 2019 the Panel undertook a discussion around parking services and some of the barriers faced by disabled people in accessing these services. The Panel heard from members of the public, majority and minority group Councillors and the Cabinet Member on this issue. The Panel received evidence that the process of getting a Blue Badge could be long and involve dealing a number of different agencies. This evidence reinforced some of the concerns that the Panel Members had come across through their individual surgeries and case work. Following the discussion at the April meeting of the Environment and Community Safety Panel, it was felt that there was a real need for a review of current processes and scope to make recommendations on how these could be improved.
- 1.3 One of the key issues that was highlighted at this stage was around the problems that some residents had experienced with getting a replacement Blue Badge in the eventuality that it was either lost or stolen. The Panel were keen to understand what could be done to speed this process up. Throughout the evidence gathering process for this review it was made clear that for many residents, having a Blue Badge, and the improved accessibility it afforded, could be life changing. The Panel were keen to hear from a range of stakeholders to better understand the problems that existed and evaluate where improvements could be made.

Scrutiny and Cabinet

- 1.4 Following Annual Council in May 2019, the portfolio holder for parking services changed and the Cabinet Member for Neighbourhoods became responsible for this area. The Cabinet Member for Neighbourhoods had given evidence to the Scrutiny Review and was engaged with the issue from the outset. The Panel would like to thank the Cabinet Member for Neighbourhoods for her contribution to this review, both as a backbencher and as the Cabinet Member and the level of support and enthusiasm that she has showed towards the issues raised.

- 1.5 Following a number of the evidence gathering sessions, the Cabinet Member made clear that she was keen to progress some of the issues that had been identified and was concerned that the scrutiny process was taking longer than she would have ideally liked. At this juncture the Cabinet Member took a decision that, rather than wait for the conclusion of the Scrutiny Review, she would seek to bring an initial phase of service improvements through the Council's Cabinet and that the recommendations of the Scrutiny Review would help inform subsequent stages of the wider operational review. The initial phase of changes to existing service provision were focused on the introduction of a dedicated disabled bay scheme and a upgrade to the Civica Parking Management IT System to underpin further improvements to the parking infrastructure in the future.
- 1.6 The Panel are aware that some of the proposals were time sensitive, particularly in respect of the expiry of the existing Civica contract. The Panel also recognise that this is a long-term process and that the reports that went to Cabinet in September 2019 set out the wider strategy and vision for the years ahead. The Panel understands the Cabinet Member's desire to bring about improvements and do to do so within a defined time period, but believe that the introduction of dedicated disabled bays was done without the Scrutiny Panel having completed its review of this scheme and without adequate opportunity to speak to other boroughs that had introduced similar schemes. The scheme has a cost implication to the Council and the Panel would have liked further opportunity to assure itself of the merits of introducing a dedicated a disabled bay scheme and to understand how and where this has been successful.
- 1.7 The Panel would like to see a close working relationship between Cabinet and Scrutiny and that both elements continue to explore opportunities to work in conjunction with one another and that there is a continued role for, and involvement in, policy development for Scrutiny.

Recommendation:

That Cabinet give consideration as to how future Scrutiny Reviews could be best supported and common timelines agreed that allow Scrutiny to carry out its investigative work fully.

Aims of the Review

- 1.8 The Panel was mindful that that parking is a complex and wide ranging policy area. It was felt that the review was most likely to be effective if it focussed on Blue Badges as this was a vital area of parking policy for those with disabilities and could be a life line for vulnerable residents who relied on the independence and ability to undertake day-to-day tasks that it affords. The Scrutiny Review also looked into the issue of dedicated disabled parking bays and whether these should be offered to residents.

1.9 The review aimed to establish:

- What are residents' experiences of accessing and using a Blue Badge?
- How can the process of issuing Blue Badges and replacement Blue Badges be improved? What, if any, are the delays involved in the process?
- What is the current process around issuing of companion Blue Badges and the barriers involved;
- Should the Council offer designated disabled parking bays;
- How Haringey compares with other local authorities and what can be learned from their experiences;
- How could improvements be made to the written correspondence received by residents in relation to disabled parking services and Blue Badges;

Scope/Terms of Reference

1.10 The terms of reference for the review were as follows:

“To consider and make recommendations to Cabinet on what barriers exist in getting and using a Blue Badge? What are the experiences of disabled service users in accessing parking services, particularly Blue Badges and how and where improvements can be made?”

Sources of Evidence:

1.11 Sources of evidence were:

- Experience of residents and service users.
- Relevant data sources, including information on current Council processes and procedures.
- Research information.
- Performance information.
- Interviews with relevant key Council officers
- Disability access groups and voluntary sector organisations such as Disabled Motoring UK and Transport for All.¹
- Best practice within the sector

1.12 A full list of all those who provided evidence is attached as Appendix A.

Membership

1.13 The membership of the Panel is as follows:

Councillors: Adam Jogee (Chair), Peray Ahmet, Julie Davies, Eldridge Culverwell, Barbara Blake, Scott Emery & Julia Ogiehor.
Co-opted Members: Ian Sygrave (Chair of Haringey Association of Neighbourhood Watches).

¹ Transport for All were initially keen to be involved in the process but subsequently declined our invitation to give evidence.

2. Introduction

- 2.1 There are around 2500 Blue Badge applications and renewals a year in Haringey and approximately 2800 disabled bays. There are around 250 applications received a year and Parking Services introduce 50 new bays and remove 20 redundant bays every 3 months. Haringey offers a Companion Badge that can be used instead of the Blue Badge and was brought in to reduce Blue Badge theft. Disabled drivers are able to park using a Blue Badge or a Companion Badge. However, the Blue Badge is valid for use across the UK, whilst the Companion Badge is only valid within Haringey. Blue Badge holders and Companion badge holders are permitted to park in all permit and shared use bays and on yellow lines for up three hours and free of charge. A Blue Badge is issued for three years before a renewal is required.
- 2.2 The process of applying for a Blue Badge is done through a government website. In Haringey residents can also make a paper based application through the Customer Service Centres. Haringey Customer Services also offer Digital Assistance for residents at its Customer Service Centre, which was originally set up to assist with Universal Credit applications but is being extended to all online transactions in support of the FOBO programme.
- 2.3 Applications for Blue Badges, either online or via a paper application, are assessed by Haringey Customer Services staff. Applicants are deemed to be eligible for automatic entitlement based on set criteria which, if met and payment is received, will result in a Blue Badge being processed on that day and the DfT usually issuing the badge within 7 working days. Including postage and delivery, this process can take up to 10 working days. If the applicant does not meet the automatic criteria then their application is considered discretionary and further evidence is requested or a physical assessment of their mobility is undertaken.
- 2.4 The criteria for Blue Badge eligibility is set externally by the Department for Transport and is not something the Council has control over. All boroughs use this criteria for Blue Badge applications. Local authorities are, however, responsible for organising the assessment for discretionary applications, based on DfT criteria, as well as the day-to-day administration and enforcement of Blue Badge schemes.

Blue Badge eligibility as set by the DfT² is based on:

- a) Entitlement without further assessment if at least one of the following applies (automatic entitlement):

² <https://www.gov.uk/government/publications/blue-badge-can-i-get-one/can-i-get-a-blue-badge>

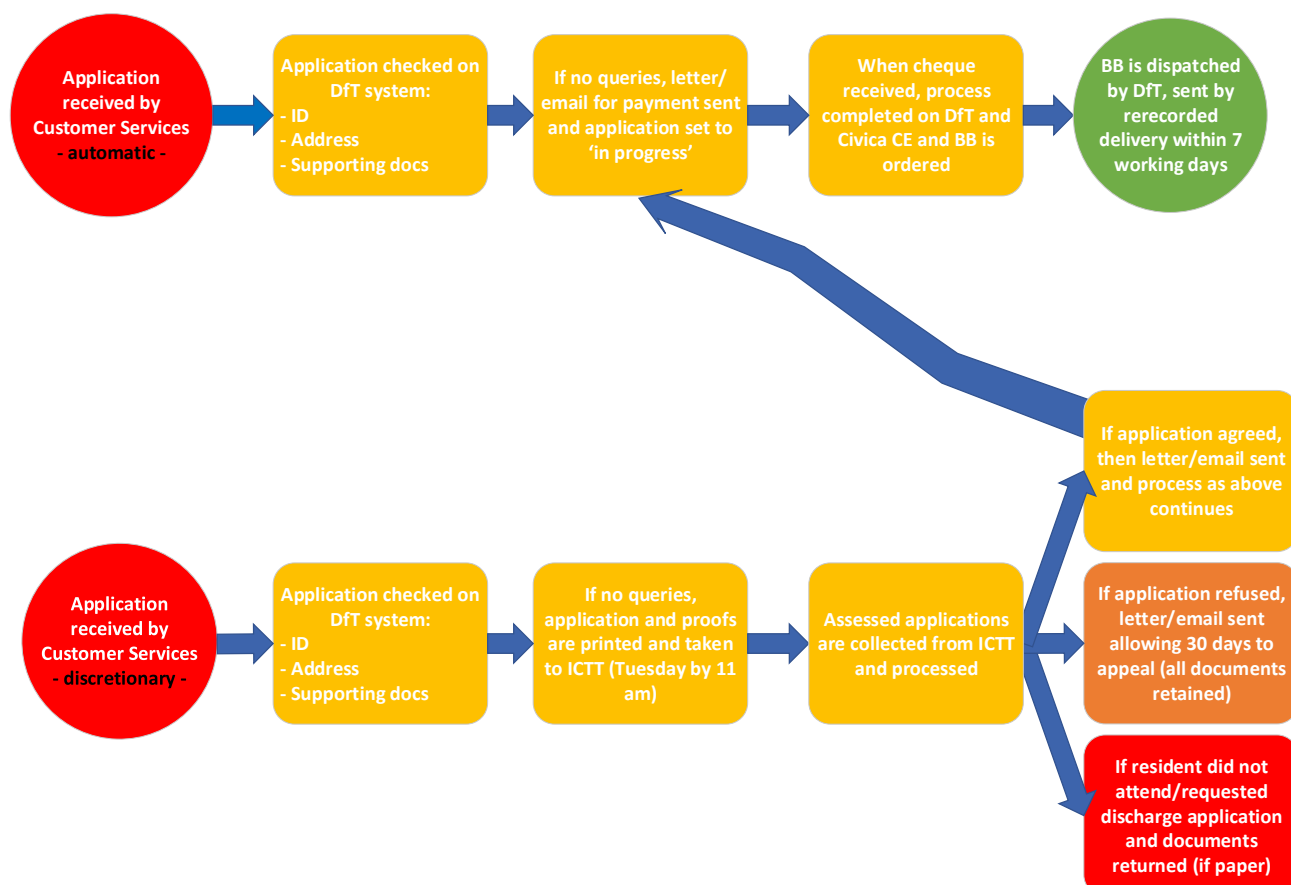
- In receipt of the higher rate of the mobility component of the Disability Living Allowance (DLA).
- In receipt of Personal Independence Payment (PIP) because you can't walk more than 50 metres (a score of 8 points or more under the 'moving around' activity of the mobility component).
- Registered blind (severely sight impaired).
- In receipt of a War Pensioner's Mobility Supplement.
- Receives a lump sum benefit within tariff levels 1-8 of the Armed Forces and Reserve Forces (Compensation) Scheme and have been certified as having a permanent and substantial disability which causes inability to walk or very considerable difficulty in walking.
- In receipt of the mobility component of PIP and have obtained 10 points specifically for descriptor E under the 'planning and following journeys' activity, on the grounds that you are unable to undertake any journey because it would cause you overwhelming psychological distress.

Or

b) Entitlement subject to further assessment. This is determined based on evidence and assessment. The DfT set out the following criteria:

- A person is unable to walk at all.
- A person is unable to walk without help from someone else or using mobility aids.
- A person finds walking very difficult due to pain, breathlessness or the time it takes.
- Walking is dangerous to their health and safety.
- A person has a terminal illness, which means they are unable to walk or find walking very difficult and have a DS1500 form.
- A person has a severe disability in both arms and drives regularly, but cannot operate pay-and-display parking machines.
- A person with a child under the age of 3 with a medical condition that means the child always needs to be accompanied by bulky medical equipment.
- A person with a child under the age of 3 with a medical condition that means the child must always be kept near a vehicle in case they need emergency medical treatment.
- A person struggles severely to plan or follow a journey.
- A person finds it difficult or impossible to control their actions and lack awareness of the impact they could have on others.
- A person regularly experiences intense and overwhelming responses to situations causing temporary loss of behavioral control.

2.5 Table 1. Application Process in Haringey for a Blue Badge - Automatic versus Discretionary process.*



*Discretionary assessments are carried out by Integrated Community Therapy Team (ICTT), which is part of the Whittington Trust.

Changes to the Blue Badge Scheme in June 2019

- 2.6 On 15th June 2019 the government released new guidance on Blue Badges which included changes to the eligibility criteria. These changes then came into force from 30th August 2019. Blue Badge eligibility criteria was extended to include hidden disabilities and includes people who are unable to walk as part of a journey without considerable psychological distress or the risk of serious harm. The expanded scheme coincided with the launch of a new task force to toughen up enforcement of the scheme and prevent misuse. To date, very little progress seems to have been made in relation to this task force.
- 2.7 In announcing the new guidance, the government set out that this was the biggest change to the scheme since its creation in the 1970s. The Panel received evidence from DMUK that a significant uptake in Badges was anticipated as a result of these changes. A funding pot of £1.7m was set up by the government to help councils with the expected increase in applications.

However the funding is only available in the in the first year of the programme. If the expected uptake in applications is sustained over longer period, Cabinet may need to consider additional funding to support this.

3 Dedicated Disabled Bays

Dedicated Disabled Bays

- 3.1 Cabinet adopted dedicated disabled bays at its meeting on 10th September 2019. All new disabled parking bays that the Council installs, at the request of residents, as of January 2020 are for the sole use of the applicant. Each bay will be marked by an identifying number, which corresponds to the user's permit. If a non-permitted Blue Badge holder uses this bay then they will be liable to receive a Penalty Charge Notice (PCN). Residents will also be able to submit an application to have their existing disabled bay converted into a dedicated bay. The Council's Disabled Parking Place Policy sets out that the Council will continue to install Disabled Parking Bays in town centres and other places of interest that can be used by any holder of a Blue Badge.³
- 3.2 The Panel received significant evidence from a range of contributors as to the importance that access to parking can make to people with disabilities in allowing them to park near their home or place of work. Access to disabled parking ensures that residents with disabilities are able to use their vehicle to undertake a range of day-to-day activities. Conversely, without access to parking many residents are fearful of going out and using their vehicle for fear that they will be unable to park upon their return. For those with significantly reduced mobility and a diminished capacity to walk even short distances unaided, this is a source of significant anxiety. The importance of a Blue Badge and access to parking on the health and wellbeing of users should not be underestimated and a number of those who gave evidence to panel characterised it as an essential part of their lives.
- 3.3 The evidence we received from Disability Motoring UK set out very clearly that one of the main concerns for disabled motorists was around a lack of enforcement and lack of available parking. The vast majority of Blue Badge holders respect the scheme and use their badges appropriately. However, with the introduction of more lenient eligibility criteria for Blue Badges by the DfT in August 2019, it is anticipated that the demand on existing disabled bays would increase significantly. This additional pressure is likely to be exacerbated in London by sustained population growth. The Panel also received evidence that when marking out disabled bays authorities needed to be mindful of the additional room required by vehicles with a disability ramp and that the of placing more than two bays in a line should be avoided for this reason.
- 3.4 Overall, the Panel broadly welcomes the introduction of dedicated disabled bays and is cognisant of the impact these may have on the quality of life for an individual Blue Badge user. However, the Panel is also concerned that the ongoing conversion of disabled bays to be used by a specific person at a specific location will have a significant effect on the overall availability of disabled bays across the borough. Given the increasing demand pressures expected on disabled bays and parking spaces in general, the Panel is concerned that the move to dedicated disabled bays will place additional strain on a limited resource. A Blue Badge

³ <https://www.haringey.gov.uk/sites/haringeygovuk/files/disabled-parking-place-policy.pdf>

holder may be able to park their car outside their residence but they will also need available parking at the other end of their journey. The Panel notes the adoption of an 'Opt-in' approach, partly in response to similar concerns, but feels that most users will seek to utilise this service once it becomes widely known.

Recommendation:

That Cabinet undertake to monitor the implementation and conversion of dedicated disabled bays going forward, with a particular focus on its impact on the overall availability and distribution of disabled parking bays.

Appeals Process

- 3.5 The Panel welcomes the adoption of an appeals process for rejected disabled bays and some of the evidence it received during this Scrutiny Review related to the lack of an appeals process and a perception that the process could feel arbitrary. There was also a general lack of understanding from residents on the rules and criteria behind disabled bays and why, if you had a Blue Badge, you we're automatically entitled to a disabled bay. The Panel noted concerns about a lack of joined-up thinking on Blue Badges and disabled bays. There was a feeling among some of the contributors to this review that the process for applying for a disabled bay should be made easier, given the amount of evidence required when applying for a Blue Badge.

Disabled Bay Eligibility Criteria

- 3.6 Eligibility criteria for disabled bays is set by the Council but is based on the automatic entitlement for a Blue Badge set out in Paragraph 2.3 of this report. The Panel is broadly supportive of the Cabinet's decision to introduce an assessment process for those who do not qualify automatically, in as much as it is felt that criteria for automatic entitlement is not a suitable determinant on its own. The Panel is keenly aware of the fact that mobility should be a determining factor when it comes to eligibility for a disabled bay however, it is concerned by the fact that this is largely determined on receipt of enhanced rate disability benefits. The Panel are concerned that many people who require a disabled bay will not be in receipt of benefits and are also concerned about the age restriction for eligibility for PIP and the potential disadvantage that causes to those over the state pension age.
- 3.7 It is not felt that that the introduction of an assessment process similar to the one used for Blue Badges adequately addresses these concerns. Particularly as going through an assessment process will create additional delays to the application process as well as the additional time and resource pressures on already stretched services. The Panel feel that that the eligibility criteria should be amended so as not to be based on the extent to which a person receives benefits. Significant concerns exist about the government's handling of benefit entitlement and the inherent unfairness of this system. The Panel does not feel sufficiently assured that the current arrangements provide the necessary safeguards to protect disabled residents who are not in receipt of benefits.

Recommendation:

That Cabinet reconsider the eligibility criteria for disabled bays and the use of automatic entitlement based upon whether the person is in receipt of higher rate/enhanced rate benefit payments.

4 Applying for and renewing a Blue Badge

Process/Online Applications

4.1 When a resident contacts the Council about a Blue Badge the applicant is signposted to a government website in order to fill out an online application. The specific section of the gov.uk website that relates to Blue Badges is run by Northgate, an external supplier that the DfT have commissioned to manage this. In order to undertake the application process the following information is required:

- A recent digital photo showing their head and shoulders.
- A photo or scanned copy their:
 - Proof of identity (such as a birth certificate, passport or driving licence).
 - Proof of address (such as a Council Tax bill or government letter).
 - Proof of benefits (if you get any).
- The applicant also needs to provide:
 - National Insurance number.
 - Details of their current Blue Badge (if they're reapplying for a Blue Badge).

4.2 The Panel were pleased to hear from officers that residents could still make a paper application and that digital support in undertaking the online application was offered to residents at Customer Service Centres. The Panel felt strongly that paper applications need to be retained for those without access to IT or those without the requisite knowledge and skills to undertake an online application process and welcomed the assurances they received to that effect. The Panel broadly endorses a digital default approach and recognises that this is part of a wider reshaping of Customer Services through the FOBO programme, provided that this comes with the continued safeguard of paper copies being available as well.

4.3 The Council are responsible for the administration process of assessing eligibility and processing the application. As part of the online application process, applicants are requested to pay a £10 administration fee which goes to the Council to cover the cost of Customer Services staff processing and administering the Blue Badge. The £10 administration fee is the maximum allowed in England as set out in statute and the Panel received evidence that it was debatable whether £10 was sufficient to meet all of the costs of administering the badge.

4.4 The Panel were surprised to hear that the £10 administration fee for the application could only be done via cheque, which was made payable to the Council. It was felt that cheques were becoming increasingly obsolete and that this was entirely out of sync with having an online application process. A number of Panel Members remarked that they were unsure whether they even owned a cheque book. The Panel also received evidence that the use of cheques to make the payments caused significant delays to the process.

- 4.5 The online system used for processing applications was commissioned by the DfT and the fact that applicants can't make online payments in support of their applications may be largely outside of the Council's control. The Panel heard evidence that the Council had previously used its own system for Blue Badge applications and that this had included the facility to make online payments. The decision to migrate to the DfT system was taken on the basis of greater functionality. Incidentally, the Panel was advised that, apart from the lack of online payments, the DfT system was a significant upgrade on the previous system and was much easier to use.
- 4.6 As part of the upgrade to Civica it is anticipated that there will be significant opportunity to improve the Council's service offer and make it more user-friendly. The Panel welcomes plans to improve systems to avoid duplication and allow IT systems to 'talk' to one another. It is hoped that this will reduce the number of times residents are asked to supply the same information to the Council and reduce costs. It is anticipated that this will make processing new badges and renewals quicker and much easier for residents. However, a fundamental part of this is developing online payments for Blue Badges. The Panel was advised that if the online application process took online payments, application that met the automatic criteria would take approximately 10 minutes to process and then 7 working days for the DfT to issue the badge.

Recommendation:

That Cabinet undertake to explore ways of ensuring that online payments can be made for Blue Badges. At present the £10 administration fee can only be paid via cheque which causes unnecessary delays.

This may require engaging with the DfT and seeking changes to the government website. It is suggested that Local Members of Parliament could be engaged on this issue and their influence sought.

Improvements

- 4.7 The Panel would like to see a process whereby Blue Badge applicants received regular updates on the status of their application and that this could be automated, so as to minimise the impact on staff resources. The application for a Blue Badge can take up to six weeks and it is anticipated that generating automatic updates on the status of applications would close the feedback loop to residents and also reduce pressure on the Council's Customer Services.
- 4.8 One of the recurring themes from the evidence that the Panel received was around a lack of joined up services when it came to applying for a Blue Badge. The fact that the process involves both Customer Services and the Concessionary Travel team within the Council, which in itself can involve multiple phone calls, emails and even visits to the Customer Service Centre, as well as dealing with a DfT managed IT system and NHS primary care services is identified as a source of significant frustration for service users. The fact that the process involves dealing with multiple agencies leads to delays and applicants having to relay the same

information several times. It also increases the likelihood of documents being lost in the system. The Panel feels that there is significant scope to improve joined-up working in this area and that in an ideal world this would all be managed by one agency.

- 4.9 The Panel received evidence that a number of residents had experienced a situation where a Blue Badge holder had reported their badge stolen and had applied for a replacement but had still received a PCN from a Civil Enforcement Officer (CEO). Residents also reported significant problems when it came to uploading documents as part of the online application process. Uploading photos was often straightforward, but attempts to upload documentary evidence were often unsuccessful. This could require phone calls to more than one department or agency to resolve. The applicant is usually directed to send the missing information to the local authority by post or in person. A further example of the disjointed nature of the process is the fact that the Haringey website states that the process takes up to six weeks whilst the gov.uk websites advised that this can take up to 12 weeks.
- 4.10 The Panel heard evidence from Brian Leveson, who is a local resident and the parent of a severely disabled child. Mr Leveson emphasised the importance to the quality of life for his family that the Blue Badge provided, as well as the fragmented nature of applying for the badge and a perception that each service/agency worked in silo. Mr Leveson set out that delays to the application process had a significant effect on his family, especially in the context of needing to attend regular hospital appointments. Mr Leveson was registered for Council Tax and with the SEND transport service, whilst his son was enrolled in a local school. Despite the authority holding all of the relevant information, Mr Leveson was still required to provide the information again when renewing the Blue Badge.
- 4.11 The Panel feels that the Council should be doing everything it can to remove obstacles for Blue Badge users but it was concerned that sometimes it seemed as though the Council was actually putting additional obstacles in the way. One example relayed to the Panel was of a resident having to attend the Customer Service Centre to deal with the a Blue Badge application in person only to be sent away as they did not have the full DLA letter from the DWP, despite the fact that it was only the first page that contained the relevant information.
- 4.12 The Panel heard evidence from Mr Leveson that in comparison to applying for other services, applying for a Blue Badge could be frustrating but that this was partly due to only having to do it every three years, so exposure to the process was limited. It also meant that the process could have changed since the last application. The Panel was advised that one of the main sources of frustration was not being able to speak to the concessionary travel team directly and having to go through Customer Services instead, as this caused delays and generated multiple contacts with the Council unnecessarily. The Panel feels that there should be some provision to speak to the Concessionary Travel team directly, given the vulnerable nature of some of the applicants for Blue Badges and the impact delays can have.

Recommendation:

That provision be put in place for Blue Badge applicants to be able to speak to the Concessionary Travel team directly.

4.13 *Badge Renewal*

The process for renewing a Blue Badge is largely the same as applying for the first time and the Panel notes that it is not necessary to resend the old badge away when applying for a replacement. During evidence gathering, a number of residents raised the issue of a lack of a reminder letter that a Blue Badge was due for renewal. The Panel heard evidence that there had not been a conscious decision to stop sending out reminder letters to residents. However, unlike the previous Bevis system, the system used by the DfT simply did not have the functionality to send out reminder letters automatically at present. The Panel were advised that the DfT system was still in development and had effectively been a beta site for some time. It was anticipated that the facility to generate reminder letters should be forthcoming. The Panel would like to see automatic reminder emails and letters sent out to Blue Badge holders.

Replacement Blue Badges

4.14 The Panel welcomed the fact that there was a specific process in place for reissuing Blue Badges that had been stolen. Badge holders were required to report the theft to the Police and provide a crime reference number. The badge would normally take 7 working days to issue. A number of people who spoke to the Panel as part of this review complained about the length of time that renewals and replacement Blue Badges took. The Panel advocates that the Council should look at ways to speed up the process and explore how lost or stolen Blue Badges could be turned around more quickly. The Panel hopes that the upgrade of the Parking Management IT system may facilitate this.

Recommendation:

That Cabinet explore ways in order to make the process of applying, renewing and being assessed for, a Blue Badge more streamlined and less disjointed. Specifically, the Panel would like Cabinet to consider:

- **Whether updates could be provided to applicants on the status of their application?**
- **Whether this could be automated?**
- **Ensuring that applicants can upload documents online.**
- **That provision of an automatic renewal reminder email/letter to Blue Badge holders at the appropriate point, be explored?**

- 4.15 Throughout the evidence gathering process, it was made clear to the Panel that one of the main concerns from Blue Badge users was around delays and the inherent difficulties involved in having to deal with more than one agency. It was also evident that the Council was the agency that bore the brunt of complaints and was largely held responsible when delays occurred. However, Customer Services process the vast majority of applications on the day they are received. In light of the perception and the fact that the authority has some leverage to try and improve the process, the Panel feel that the Council should take more of a hands-on approach to monitoring the overall journey of applications and ensure that there is a more integrated approach taken by all parties. It is felt that the Council is perhaps best placed to take a leading role on breaking down operational silos.
- 4.16 It is suggested that the Cabinet Member should undertake a piece of work to see what could be done around minimising delays and ensuring that the Council monitors the application process from start to finish. It is felt that bringing responsibility for the whole process under one person will facilitate improvements through a more robust monitoring process. The Panel would like to see the Cabinet Member receive regular performance monitoring updates as part of their portfolio. This will provide relevant data on where delays occur and allow us to better understand where further improvements could be made. Some of the data already exists such as that presented to the Panel by Customer Services. However, there are a number of stages in the process where performance is not collected. As an example, the Panel heard that Stuart Crescent did not collect data on missed appointments for the assessments visits. Missed appointments usually resulted in the application being sent back to the Council and delays occurring as a result.

Recommendation:

That the Cabinet Member should have a greater oversight of the overall process from start to finish. The Cabinet Member should receive regular performance monitoring updates from the different areas and an action plan should be developed to improve monitoring and ensure delays are minimised.

- 4.17 It is felt that there is a gap at the partnership level around monitoring this issue and that it would benefit from the development of a more co-ordinated multi-agency response. As well as the Cabinet Member looking at how they can take a greater role in monitoring the process as a whole, it is evident that the Council can't resolve this issue on its own and needs to work with partners to improve outcomes for service users. To that end, the Panel would like to see the Cabinet Member meet with key stakeholders on a quarterly basis as part of strategic partnership forum to ensure that the overall application process is done in a way that is joined-up and made more accessible. The Council has a number of partnership forums that it uses to develop a multi-agency response and it is felt that this could build on that network. It is suggested that the forum outlined could even be established on a time-limited basis.
- 4.18 The forum would likely be made up of Council representatives, health colleagues, police and the DfT. This would provide an additional level of accountability as well as a dedicated body to ensure that a more integrated and considered approach is

taken. It is suggested that this would also provide an ideal forum for addressing Blue Badge related crime. The Panel feels that this is a major concern and one that requires a partnership level response.

Recommendation:

That the Cabinet Member undertake to arrange a quarterly strategic partnership forum with key stakeholders, including the Council, the Whittington, Police and DfT to ensure that the overall journey is streamlined and made more accessible. This would also provide a partnership forum to address Blue Badge related crime as per recommendation 11.

5 Enforcement and Blue Badge Related Crime

- 5.1 The Panel received a significant amount of evidence around the rise of Blue Badge related crime as well as a rise in the misuse of Blue Badges. A stolen Blue Badge could be worth a reasonable amount of money given that Blue Badge holders can often park free of charge and free from parking restrictions, such as disabled bays or yellow lines. Nationally, Blue Badge theft from vehicles has risen over 600% in the last three years. As the perceived value of a Blue Badge has increased (especially with an ever increasing pressure on London's parking infrastructure), there has been a rise in the number of fraudulent Blue Badges in circulation. The Blue Badge scheme operates across 27 different EU states (plus the UK) and their design can vary from country to country. This provides significant scope for forgery, particularly in the context of the fact that the Badges could be in one of 20 plus languages.

Enforcement

- 5.2 Disabled Motoring UK advised the Panel that the largest amount of complaints they received from Blue Badge holders were around a lack of enforcement of the scheme and the consequent impact on availability of parking spaces and a fear of negative perceptions towards 'genuine' Blue Badge holders. Concerns were also noted that without a proactive enforcement approach, this could lead to members of the public taking it on themselves to police the system and the inherent risks of a rise in vigilantism.
- 5.3 The Panel considered that Blue Badge abuse and misuse is rising due to a number of factors:
- Lack of enforcement
 - Lack of understanding of the rules for the scheme (such as Badge holders allowing family members to use their badge).
 - Failure to return Badges, such as when a family member passes away.
 - A rise in the number of Blue Badges being used from other EU countries fraudulently.
- 5.4 A number of Local Authorities have undertaken various schemes for tackling Blue Badge abuse, ranging from increased enforcement patrols, encouraging the reporting of misuse, communications campaigns and improvements to technology and IT systems. During this Review the Panel visited the London Borough of Bromley to hear from officers from their shared parking service (Bromley and Bexley) about the adoption of a zero tolerance approach to Blue Badge misuse. This came about as a result of concerns from local residents and Blue Badge holders about widespread misuse of Blue Badges in the Borough and it has been up and running for around two and a half years to date.
- 5.5 The scheme involves providing additional training for Civil Enforcement Officers (CEOs) and encouraging them to inspect any Blue Badge they come across during the course of their duties and cross referencing the numerical information on the Badge with information held on the badge holder, such as name and D.O.B. (as

well as the person who was observed using it). The CEO would call up the back office to check with the team for possible misuse and then if anything was considered out of place an investigation would be carried out by the back office. This would usually involve telephoning the registered Blue Badge holder and asking if they were using the badge at the time. Prosecution would depend on whether officers could prove misuse, through the CEO witnessing it or through CCTV footage, for example. We received evidence that the GLC General Powers Act 1972 provides Local Authorities with the ability to request disclosure of the drivers' details and if they failed to provide those, the Local Authority is able to prosecute the registered keeper.

- 5.6 Bromley estimates that around 90% of misuse is carried out by family members. One of the other issues identified was around the fact that it was relatively easy to get a replacement Blue Badge and the original could then often be found again, increasing the number in circulation. A replacement Blue Badge is not marked as a replacement and it is not possible to tell just by looking at the badge. In both instances, it was only when the CEO checked with the back-office that possible misuse could be identified. Bromley also outlined a number of examples of where Blue Badge fraud was symptomatic of wider fraudulent behaviour or criminality; including cases where the investigation also led to instances of housing benefit fraud and illegal sub-letting of a property being identified.
- 5.7 In addition to the enforcement element, a number of communications activities were undertaken as part of the zero-tolerance approach in Bromley, including press releases of successful prosecutions and newsletters to Blue Badge holders to publicise the zero tolerance approach. Bromley also introduced a poster campaign in car parks warning drivers of the risk of prosecution and the likely fines imposed. It was reported to the Panel that, overall the scheme had been overwhelmingly successful and had a positive effect on behaviour change as well as generating the Local Authority significant amount of goodwill and positive press coverage. The scheme was overwhelmingly popular with residents and Blue Badge holders. The naming and shaming of offenders was also well received. Bromley are in the process of expanding the scheme to include an anti-idling campaign, outside local schools.

Recommendation:

That the Council should prioritise tougher enforcement of Blue Badge fraud in order to ensure that those with genuine mobility issues are able to use their vehicles. Training should be provided for Enforcement officers and processes put in place so that any Blue Badge identified by a CEO was inspected and the badge holders' details cross referenced with the back office for possible misuse. The Panel heard evidence that this could take as little as 30 seconds.

Companion Blue Badges

- 5.8 Haringey currently operates a companion Blue Badge scheme which incorporates the vehicle registration number and can be used instead of the Blue Badge. The companion badge has no intrinsic value as it can only be used on the designated vehicle and is aimed at preventing theft of Blue Badges. As part of the application process for this, the resident has to be a Blue Badge holder and provide proof of address in Haringey. The vehicle registration document must be registered to that address and the Companion Badge is only valid for one vehicle. However, unlike the Blue Badge which valid throughout the UK, the Companion Badge was only valid within Haringey. Furthermore, the Panel notes that the Companion Badge is also not valid for TfL managed roads within Haringey.
- 5.9 The Panel is supportive of the Companion Badge scheme and welcomes attempts to tackle Blue Badge related crime. The Panel notes that the Companion Badge costs £30, as opposed to the £10 fee for a Blue Badge. Some of the contributors to the review felt that this was an inconsistency. However, on balance, the Panel is sympathetic to the fact that the Council has to be able to cover the costs of producing and administering the badge. The Council has seen year-on-year budget cuts since 2010 and, the Council has to make difficult choices about which services it is able to subsidise.

Theft of Blue Badges

- 5.10 As outlined, theft of Blue Badges from motor vehicles is a growing concern for Blue Badge users. The Panel heard evidence from some residents that theirs had been stolen on multiple occasions. Aside from the obvious inconvenience of having your vehicle broken in to and the badge stolen, there were also concerns outlined above about length of time it took to get a replacement especially as the process could suffer from delays and there was no facility to track the progress of a Blue Badge application.
- 5.11 The Panel received evidence from Graham Day, secretary of St Ann's and Haringey joint Ward Panel on his experiences as a Blue Badge holder in the borough. Mr Day suggested that theft of Blue Badges was a recurring issue raised at Ward Panel meetings and he had suggested that based on the figures in Harringay ward, there was probably around 700 incidents a year borough wide. Mr Day advised the Panel that he had a device which attached to the steering wheel and locked the Blue Badge in place. The device cost between £30 & £40 and had prevented any further thefts of his Blue Badge taking place. The Panel considered the relative cost of theft prevention devices against the administration costs of renewing stolen badges, sometimes on multiple occasions. The Panel feels that there is a clear case for the Council looking at how it could provide these devices for Blue Badge users, perhaps on an 'invest to save' basis, given the administration costs of providing replacements. It is anticipated that the Council could be able to take advantage of being able to receive a reduced unit cost from buying in bulk. At the very least, the Council should be promoting these devices to its Blue Badge users as part of the application process.

- 5.12 Theft of Blue Badges and Blue Badge-related crime will require working with police colleagues and other key partners to resolve. There is ample evidence of the proliferation of this type of crime and the Panel feels that this needs to be higher up the political agenda. The Council already has a partnership body that looks into crime and community safety and it is suggested that the Community Safety Partnership could provide leadership on this issue and monitor efforts to tackle it going forwards.

Recommendation:

Consideration should be given to how the Council, working with police and partners, could support the rollout of theft prevention devices for Blue Badges. The Panel received evidence that these were particularly effective and cost between £30 & £40. Cabinet should consider whether providing these was cheaper than the administration costs associated with replacing a stolen Blue Badge.

Recommendation:

That the Council works closely with the police to reduce proliferation of Blue Badge related crime. The Panel received evidence that Blue Badge theft from vehicles has risen over 600% in the last three years. It is suggested that the Community Safety Partnership could examine this issue as part of its work programme for 2020/21.

Virtual Permits

- 5.13 The Panel would like to see the Council move to a position of issuing virtual permits instead of a physical Blue Badge and believe that this should be the long term aim of for Haringey. The Panel envisage that this would work in a similar way to car tax, in that all of the information is stored electronically and there is no longer any need to physically display a tax disc on a vehicle's windscreen. All of the necessary documentation is already supplied to the Council as part of the Companion Badge application process. It would simply be a case of the CEO scanning the vehicle registration into a device and an electronic database would hold all of the relevant information, including whether that person held a Blue Badge. The clear advantage of having a system of virtual permits is that there is nothing to steal and there is no risk of forgery. Consequently, it is anticipated that that this would have significant impact on the theft of Blue Badges overnight. It would also negate the need for separate Companion Badges to be issued.
- 5.14 Although a virtual Blue Badge permit would fulfil a similar role to the existing Companion Badge scheme, it is felt that there are a number of distinct advantages. Having a virtual permit system for Blue Badges would minimise any delays associated with processing and delivery and permits could presumably be issued instantly. Having an online database that allowed the CEO instant real-time access to whether or not that person held a valid Blue Badge would also eliminate mistakes and the risk of CEO's incorrectly issuing PCN's for failing to display a Blue Badge or Companion Badge. As has been outlined elsewhere in this report, this is an issue

especially when the holder has had their Blue Badge stolen. Virtual permits would assist with the Council's carbon reduction targets as there would be no need for a paper Companion Badge to be produced, as well as the associated reduction from not having to undertake postage and delivery. It is also expected that there would be savings available from moving to virtual permits through streamlining processes and reducing administration.

- 5.15 The Panel recognise that introducing a system of virtual permits is not something that can be done overnight and that this is a long term aspiration. It would take some time to develop our processes in support of this and there would likely be costs involved in upgrading the functionality of the IT systems and the hand held devices used by CEOs. It is hoped that the decision to upgrade the Parking Management IT System will provide opportunities to explore how this could be done and at what cost. Alongside virtual permits the Panel feel strongly that the Council should also retain some provision of a paper application process as there are significant equalities considerations when moving to an online application system only.

Recommendation:

That the Council explores the feasibility of issuing virtual permits instead of Companion Badges. Cabinet should also ensure that provision of paper applications is retained on some level in order to ensure residents without access to IT are not unduly disadvantaged.

- 5.16 The London Borough of Bromley have moved to a position of virtual permits and advised that they had achieved significant cost savings as a result. There are a number of examples of authorities that have transitioned to a similar system and the Panel would like to see the Cabinet Member engage with other boroughs that have implemented virtual permits to see what lessons could be learnt.

- 5.17 The Panel would also like to see virtual permits encouraged at a pan-London level and believe that the Mayor and London Councils should be engaged to promote this issue. Exploration of the feasibility of adopting a more integrated approach across London is encouraged, albeit it is recognised as a long term outcome. The Panel would like to see a situation where a virtual permit issued to a Haringey resident could be used across London. In order to achieve optimal results in tackling the theft of Blue Badges we need co-ordination at a London-wide level in order to ensure that the IT systems are joined up and that processes are integrated.

Recommendation:

The Cabinet Member should engage with other boroughs that have implemented virtual permits to see what lessons can be learnt. Engagement should also be sought with the Mayor's Office and London Councils to encourage adoption at a Pan-London level and explore the feasibility of having a more integrated system across London.

6 Correspondence and Communication

Correspondence with Residents

- 6.1 The Panel received evidence around a variable quality in the letters and other forms of communication issued by the Council around Blue Badges and associated parking services. Residents were concerned about the tone of some of the communications especially in reference to where that person was required to do something or had failed to provide what was requested. It was felt that the language used could be quite intimidating and a disproportionate emphasis was placed upon the potential sanction or penalty, rather than simply providing the information requested. One example we received was around a straightforward request for information around a Blue Badge renewal, the response to which was unduly focused on highlighting the possible penalties to that person from continuing to use the badge after its expiry. The person was directed to the gov.uk website but no additional information was provided about how long the process could take or what documentation was required.
- 6.2 Other concerns highlighted to the Panel were around a lack of clear advice when it came to communications and concerns that letters and emails were not always set out in a way that made them easy to understand. We also received evidence of instances where the Council treated what was essentially a recurring service request as a complaint. In one instance, a service user wanted to know if and when they would receive a disabled parking bay, but were instead directed through a complaints process. The resident in question also commented that, after receiving approval, they never received any contact from the Council telling them when the bay was going to be installed. Frustrations from residents at automated telephone messages advising people to go online were also relayed to the Panel. It is felt that for those with severe disabilities, it is not always as easy to access online services and that some consideration should be given as to how appropriate this message is in these circumstances.
- 6.3 It is felt that the issues raised in relation to the quality and tone of correspondence are likely to be broader than just Blue Badges and that the issues raised as part of this review will likely have a resonance across the organisation. It is therefore suggested that a review should be undertaken of the correspondence from across the organisation that Council sends out to its residents.

Recommendation:

That a commitment is given that the Council will carry out a review of the letters and communications that it sends to residents to ensure that they are clear, courteous and without the use of intimidating language.

Reporting a Disabled Bay that is no longer in use.

- 6.4 The Panel heard evidence from local residents and ward councillors that removing a disabled bay that was no longer in use could be quite a long and drawn out process. Many Disabled Bays have been in place for a number of years and in many instances the original applicant may well no longer living there. Given the decision to implement Dedicated Disabled Bays and the anticipated increase in demand for disabled parking spaces, it is felt that there is an imperative to monitor and remove obsolete disabled bays as promptly as possible. The Panel understands that notice has to be given for a removal of a bay and that this can take some time. However, the panel heard anecdotal evidence of the process taking over six months in some cases.
- 6.5 The Panel were keen to see some communications activity undertaken on this issue to engage with residents and encourage them to report bays that were no longer in use. The Panel suggest that there could be a dedicated web page on the Council's home website where residents could 'Report an Unused Disabled Bay.' This could be supported through press releases and other communications activity.

Recommendation:

That the Council implement provision for residents to report disabled bays that were no longer in use and that processes are put in place for adequate monitoring of disabled bays and whether they were being used. Once a bay is identified as being unused there should be a clear timeline for its removal. A campaign should be launched through Haringey People and our website to "report an unused disabled bay".

Communications Activity

- 6.6 In light of concerns from residents that applying for or renewing Blue Badge could be a complicated process and involve liaising with different services and agencies, the Panel would like to see the Council send out a booklet of key information to residents as soon as they are assessed as meeting either the automatic or discretionary criteria. It is anticipated that this booklet will provide a range of information, advice and guidance on the process and the anticipated timescales involved. It would also provide an opportunity for the Council to provide information on other services such as how to apply for a Dedicated Disabled Bay.

Recommendation:

That the Council should send out a booklet of key information to residents as soon as they are assessed as being eligible for a Blue Badge.

- 6.7 The Panel also feel that there is scope for the Council to take a more proactive approach in issuing reminders to cancel a Blue Badge when a death is registered. The Council's Register Office is responsible for the recording of a death. This is usually undertaken by a relative and should be done within 5 days (in England).

As part of this process, a raft of information is given to the next of kin about who to contact and what to do next, including information on pensions, taxes and benefits. The Panel suggests that a reminder around cancelling Blue Badges could be easily incorporated into that process. As has been highlighted elsewhere in this report, a significant amount of misuse of Blue Badges is done by family members including continuing to use the badge after that person is deceased. Cancelling a Blue Badge is unlikely to be at the forefront of a person's mind when registering a death. Providing a gentle reminder at this juncture is felt to be appropriate and in keeping with other forms of information provided.

Recommendation:

That the Council explore ways in which an automatic reminder could be issued to cancel a Blue Badge, along with the existing information given to the next of kin when a death is registered.

- 6.8 Following on from Recommendation 9 in respect of adopting a more proactive enforcement approach to Blue Badges, the Panel feels that a communications campaign should be implemented across the Blue Badge agenda which clearly sets out the Council's enforcement message. This would also provide an ideal opportunity to promote some of the other recommendations from this review such as use of anti-theft devices as well as other pertinent information in relation to parking.
- 6.9 During the course of this review the Panel heard from a representative of the Equalities Steering Group for Haringey staff. The representative advised that she had a non-visible disability and was reluctant to apply for a Blue Badge, due to the fact that she did not 'look' as though she had a disability. It was reported to the Panel that many staff members had encountered hostility from people who perceived that they didn't fit the stereotype of what a disabled person should be. Consequently, a number of staff in Haringey were reluctant to acknowledge their disability and didn't feel entitled to apply for a Blue Badge. The Panel also heard evidence that there were a number of cases disabilities where the symptoms and mobility levels a person has could vary significantly over a short timescale and that basing an assessment on mobility at a fixed point in time was flawed.
- 6.10 The Panel recommends that Cabinet seek to include disability access representatives and the Equalities Steering Group in developing a communications campaign. As part of the campaign, consideration should be given to awareness raising around disability and that staff can access advice and support in applying for a Blue Badge. The Panel suggests that one of the topics of the campaign should focus on raising awareness that not all disabilities are visible.

Recommendation:

A communications campaign should be implemented across the Blue Badge agenda which clearly sets out the Council's enforcement message. It is suggested that disability access representatives and the Council's Equalities Steering Group should be involved in developing this campaign and that consideration should be given highlighting awareness around the fact that not all disabilities are visible.

7 Assessments for Discretionary Blue Badge Applications

Discretionary Application Process

- 7.1 If the applicant does not meet the automatic eligibility criteria for a Blue Badge, Customer Services will refer the applicant for an assessment. In Haringey, Assessment for non-automatic or discretionary entitlement is carried out by a qualified assessor through the Integrated Community Therapy Team (ICTT), at the Whittington Trust, which is located at Stuart Crescent Health Centre. The Panel received evidence from Adeola Akano, Clinical Services Manager for ICTT that the clinic held slots on a Wednesday and Thursday to undertake the assessments, with six members of staff working on them (depending on the number of referrals received). Ultimately, it was the responsibility of the Senior Therapist to make a clinical judgement on whether someone was assessed as qualifying for a Blue Badge and this was done through reviewing the application bundle and consideration of the assessment score. The Panel were advised that the Senior Technician did not undertake the mobility assessment or have direct contact with the applicant (unless it was an appeal). The criteria used in determining eligibility for a discretionary entitlement is set out at Paragraph 2.4 of this report.
- 7.2 Applications for discretionary assessment are taken to Stuart Crescent once a week on a Tuesday by Customer Service staff. When the applications are dropped off, completed assessments are collected at the same time. If the application was approved, payment is requested by Customer Services in order to process the application. The Panel were advised by Customer Service that the application was processed on the day payment was received. Customer Services are not allowed to process Blue Badge applications without receiving payment and could not undertake any part of the process until they knew the applicant had been assessed as meeting the eligibility criteria. Once payment is received, the application is processed and it takes 7 working days for the DfT to issue the badge, as per applications that met the automatic eligibility criteria.
- 7.3 If the application is refused and the person is assessed as not meeting the criteria, Customer Services would then contact that person to advise that their application has been refused and that they have a 30 day window in which to appeal. All of the documents that have been received were retained during the 30 day window in order to support any potential appeal. During an appeal, the applicant could be asked to provide further evidence and could also be asked to repeat the mobility assessment. An appeal is undertaken by the Senior Therapist or the Team Leader at Stuart Crescent. If the appeal is unsuccessful, the application is withdrawn or applicant does not attend the assessment then the case is closed and Customer Services return all of the documents to the applicant.

Electronic Applications and Improving the Process.

- 7.4 The Panel considered the fact that applications were only sent to Stuart Crescent once a week and believes that this is source of delay. Further delays are then caused by the completed assessments also being collected once a week. The Panel were advised that Customer Services did not monitor the time between dropping off and collecting applications but applicants are advised that the process can take up to 6 weeks. The application bundles that are provided to Stuart Crescent are hard copies and the first task that staff at Stuart Crescent have to undertake is to manually key in all of the information from the bundle on to a spreadsheet. The feels like quite an antiquated approach and the Panel are surprised that printed hard copies of the application and documentary evidence are still used. One way to speed up the process and reduce the level of administration is to transfer the information to Stuart Crescent electronically. It is suggested that this would also have the advantage of being able to be undertaken at any time rather than waiting until a Tuesday morning. The Panel heard evidence that the issue revolved around the old IT system used at Stuart Crescent and concerns about information security. The Panel were advised that the Whittington Trust were in discussions to develop a secure system for document transfer.

Missed Appointments

- 7.5 The Panel noted with some concern that the window for late arrival to the assessment appointment was five minutes. If the appointment was missed Stuart Crescent advised that they would usually allow the applicant to reschedule the appointment once, but that after this the application was sent back to the Council. The Panel are clear in their view that an alternative slot has to be provided to applicants if they are unable to attend the appointment and that the Council should ensure that this takes place. The Panel feels that having an inflexible approach will contribute to further delays and that this should be reconsidered. The Panel received evidence from residents that a five minute was a very narrow threshold, particularly for people with limited mobility. Furthermore, this is exacerbated by a lack of parking facilities, including disabled bays, at the site and the fact that it is a walk to the nearest bus stop which involves crossing a very busy road.
- 7.6 The Panel received slightly conflicting evidence from Stuart Crescent as to the flexibility with which staff enforce the five minute window for late appointments. The Panel were initially informed that this was a necessity and that applicants were clearly advised that they could not be late and should arrive early for appointments. After some follow up questions, Ms Akano indicated that there was some degree of flexibility in this. However the experiences of residents that we heard from suggested that this contributed to delays and provided an added level of stress and anxiety for those attending the clinic. The Panel were interested to know what percentage of people had their appointments rescheduled and applications returned due to being late, but were advised that this information was not collected. The Panel feel that this is something that the Cabinet Member for Neighbourhoods may want to follow up on.
- 7.7 The Panel is sympathetic to the pressures that NHS services are under and the fact that delayed appointments have a knock-on effect, but emphasise the need

for common sense to be used. Especially in light the fact that a number of applicants that attend the assessments will have severe disabilities. The Panel would also like to highlight the fact that people attending GP appointments are afforded a 10 minute window. Overall, the Panel believes that there is scope for the Council to work with the ICTT team to improve the service and make it more responsive to residents' needs. It is suggested that the Cabinet Member having greater oversight of this process could be a key driver.

Recommendation:

That consideration should be given on to how to minimise delays within the assessment process, including ensuring that assessment bundles can be transferred to Stuart Crescent electronically.

Recommendation:

It is recommended that, the Council should work with Stuart Crescent Health Centre to ensure that the current 5 minute deadline for late arrivals was extended and a greater degree of flexibility afforded to applicants, given the mobility levels of the people being assessed and the lack of available parking facilities.

The Cabinet should work with the Whittington Trust to ensure that residents were provided with an alternative date when an appointment was missed.

Location of Assessment Site

- 7.8 The Panel raised concerns about the accessibility of the current site at Stuart Crescent given the limited parking available and considered whether alternative sites could be sought. In response, we were advised that there is an alternative site used at Gordon Road and that appointments alternated between Stuart Crescent and the Gordon Road site on a weekly basis. Residents are able to request the Gordon Road site that has more parking available, however this is not advertised and residents would have to call up the clinic to reschedule to then be offered a later appointment at Gordon Road. The Panel notes that the initial letter sent to applicants only refers to the Stuart Crescent site. It is felt that the fact there is a second location to undergo an assessment from could be better communicated to residents and that residents should be given more of a choice between the two.
- 7.9 The Panel would also like to see additional sites sourced across the borough, particularly as both current sites are fairly central and east-west transport links can be slow. It is suggested that commissioning more than one provider to undertake assessments would also provide an additional level of flexibility. Residents should be able to have a choice of location for their assessment. The panel would like to see a site in Tottenham as well as in the west of the borough. The Panel were advised by management at Stuart Crescent that there is not enough capacity at the Hornsey site at present to undertake assessments.

- 7.10 The Panel were advised that Customers Services were commissioned by Parking Services to undertake processing and administration of Blue Badge applications and that Parking also commissioned the Integrated Community Therapy Team to provide discretionary assessments at Stuart Crescent. The current 23 day time scale to undertake assessments was agreed when the contract was last commissioned. This contract was commissioned in 2009/10 and the Panel feel that this should be looked at and consideration be given to recommissioning it given the timescales involved and the fact that increased demand for Blue Badges is anticipated following the recent changes to the eligibility criteria.

Recommendation:

That Cabinet ensures that monitoring of the current 23 day timescale for applications to be processed is undertaken.

That Cabinet also explores recommissioning of the current contract to provide assessments for discretionary Blue Badge applications as it was last done over 10 years ago. The Panel recommends that consideration is given to commissioning additional providers for the assessment process for greater flexibility and distribution across the borough. The Council should explore ways of ensuring that residents have a choice of which centre they attend and that there is some provision in the west of the Borough as well as in Tottenham. The Panel suggests that recommissioning this service could potentially provide an opportunity to speed up the assessment process and minimise delays.

Appendix A

Participants in the Review:

Adeola Akano, Integrated Community Therapy Team Clinical Service Manager from Stuart Crescent Health Centre

Gossica Anichebe, Interim Policy and Programme Manager – LB Hackney

Sofia Bouceddour, Transport Planner – LB Camden

Laura Berryman

Cllr Zena Brabazon

Andy Briggs, AD for Customer Services and Libraries

Cllr Dana Carlin

Cllr Seema Chandwani, Cabinet Member for Neighbourhoods

Cllr Pippa Connor

Ann Cunningham, Head of Operations

Graham Day, Secretary of the St Ann and Haringay joint Ward Panel

Fred Fernandes, Parking Operations Manager

Graham Footer, Chief Executive – Disabled Motoring UK

Cllr Kirsten Hearn, Cabinet Member for Climate Change and Sustainability

Dawn Hunter, Concessionary Travel Manager

Brian Leveson

Carly Norris, Project Manager – LB Hackney

Elaine Prado, Head of Business Change, Customer Services.

Shereen Tennant, Haringey Equalities Steering Group

Chloe Wenbourne, Interim Head of Service - Shared Parking Service (Bromley and Bexley)

David Wray, Blue Badge and Fraud Enforcement Officer - Shared Parking Service (Bromley and Bexley)

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Report for: Environment and Community Safety Scrutiny Panel

Title: Update on Parking Transformation Programme.

Report authorised by Stephen McDonnell, Director of Environment and Neighbourhoods

Lead Officer: Ann Cunningham, Head of Highways & Parking
0208 489 1355
Ann.Cunningham@haringey.gov.uk

Ward(s) affected: All

Non-Key Decision

1 Describe the issue under consideration

- 1.1 To provide the Environment and Community Safety Scrutiny Panel an update on the progress of the Parking Transformation Programme.

2 Cabinet Member Introduction

N/A

3. Recommendations

- 3.1 That the Environment and Community Safety Scrutiny Panel notes the content of this report.

4. Background

- 4.1 The Council's Transport Strategy included the requirement for a Parking Action Plan to support the delivery of modal shift aspirations. Those actions were taken forward through an accelerated improvement programme. This included:

- Procurement of a new Parking Management IT System (PMIS)
- New operating model
- Extension of parking controls and moving traffic enforcement.
- Improved access to disabled parking services
- Introduction of contactless parking
- The introduction of map-based traffic management orders
- The review of parking policy
- Recommissioning of the Nuisance Vehicle Contract

New Parking Management IT System (PMIS)

- 4.2 The new Parking Management IT System (PMIS) is the most significant development and will underpin most service improvements. This will not only improve the efficiency of the on-street and back-office services but will have direct and tangible benefits for anyone accessing our service.
- 4.3 A presentation (attached as Appendix 1) sets out progress made to date.

The New Operating Model

- 4.4 The new operating model has been agreed and is currently being implemented. This will unlock the benefits and efficiencies offered by the new IT system. It will also ensure that adequate staffing resources are available to deal with increasing demand and respond to customers and stakeholders in a timely and positive manner.
- 4.5 This new operating model includes business development resources. This team will ensure that the service continues to adapt to a fast-changing commercial, legislative and technological environment. It will ensure the insight and analysis required to understand influences, as well as building strong networking arrangements with external agencies and collaborating with partners to influence and unlock future funding streams and investment opportunities.

Extension of parking controls and moving traffic enforcement

- 4.6 The Council has operated and managed controlled parking zones (CPZs) since 1999. At present, approximately 75% of the Borough is subject to CPZs. A new policy was agreed by Cabinet in 2020. This policy formalised arrangements that had evolved over time. Whilst priority will still be given to areas requiring new controls, the new policy provides for the review of long-standing CPZs, to ensure that they continue to meet community needs. It is intended that CPZs are reviewed every 5 years. The annual programme makes provision for this.
- 4.7 The extension of moving traffic enforcement continues, and this includes the enforcement of weight restrictions. All moving traffic enforcement is undertaken through CCTV cameras. The programme was expanded over the past year due to the School Streets programme. 23 new cameras were installed earlier this year, with a further 17 due to be commissioned in September 2021. Additional weight restrictions cameras will be installed early in the new year.

Improved Access to Disabled Parking Services

- 4.8 Improvements in this area are covered in a separate report 'Implementation of recommendations from the Review into Blue Badges and Supporting Better Access to Parking for Disabled People', being presented to the Environment and Community Safety Scrutiny Panel at the meeting on 13th September 2021.

Contactless Parking

- 4.9 Contactless (card) payment terminals are now available at 101 busy locations borough wide. This is in addition to the existing paybyphone arrangements, increasing access for those who prefer to use card payments. This has resulted in the following interactions:

TIME PERIOD	TOTAL TRANSACTIONS	DAILY AVERAGE
19 th to 31 st July	3823	294
1 st to 31 st August	8853	286
1 st September	317	-

Map-Based Traffic Management Orders

- 4.10 A new map-based traffic management order system is now in place. This has allowed the service to digitally map all parking restrictions and develop an interactive map that allows any interested party to establish parking arrangements in advance of any visit or, indeed, moving to the borough.

Review of Policy

- 4.11 A major review of parking policy was undertaken in 2020. The Parking Permits and Charges – Ultra Low Emission Zone (ULEZ) Readiness Report was presented to Cabinet in March 2020, setting out a range of changes to policy, including a surcharge on diesel fuelled vehicles. The policy continues to incentivise the use of lower polluting vehicles but with incrementally higher charge for permits in households with more than one vehicle per household. These changes were implemented in August 2021 through the new PMIS.

Retendering the Nuisance Vehicle Contract

- 4.12 The Cabinet agreed an award of contract for a new nuisance vehicle removal operation in October 2019. This contract was awarded for a period of 4 years with optional extensions up to a maximum contract term of 8 years. This contract was awarded following a commissioning exercise that considered a number of service delivery options, including bringing the service back in-house. Whilst in-house delivery was the preferred option, it was entirely contingent on the Council finding a suitable pound site. Unfortunately, after an extensive search, it was not possible to find a suitable site either in the borough or close to the borough boundary with Enfield. Efforts will continue to identify a Haringey pound site and, if those searches are successful, a transition to in-house delivery will be made as the contract reaches the 4-year anniversary.

5 Contribution to strategic outcomes

- 5.1 The parking transformation programme supports two key Themes within the Borough Plan 2019-2023:
- People Theme: A Haringey where strong families, strong networks and strong communities nurture all residents to live well and achieve their potential. A shift to sustainable modes of transport including walking and cycling will improve road safety, reduce pollution and prioritise parking spaces for those who need them.

- Place Theme: A place with strong, resilient & connected communities where people can lead active and healthy lives in an environment that is safe, clean and green. A shift to sustainable modes of transport including walking and cycling will improve road safety, reduce pollution and prioritise parking spaces for those who need them.

6 Statutory Officers' comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

Finance

There are no specific Finance issues arising from this report.

Procurement

There are no specific Procurement issues arising from this report.

Legal

There are no specific Legal issues arising from this report.

Equality

There are no specific Equalities issues arising from this report.

7 Use of Appendices

Appendix 1 – PMIS presentation

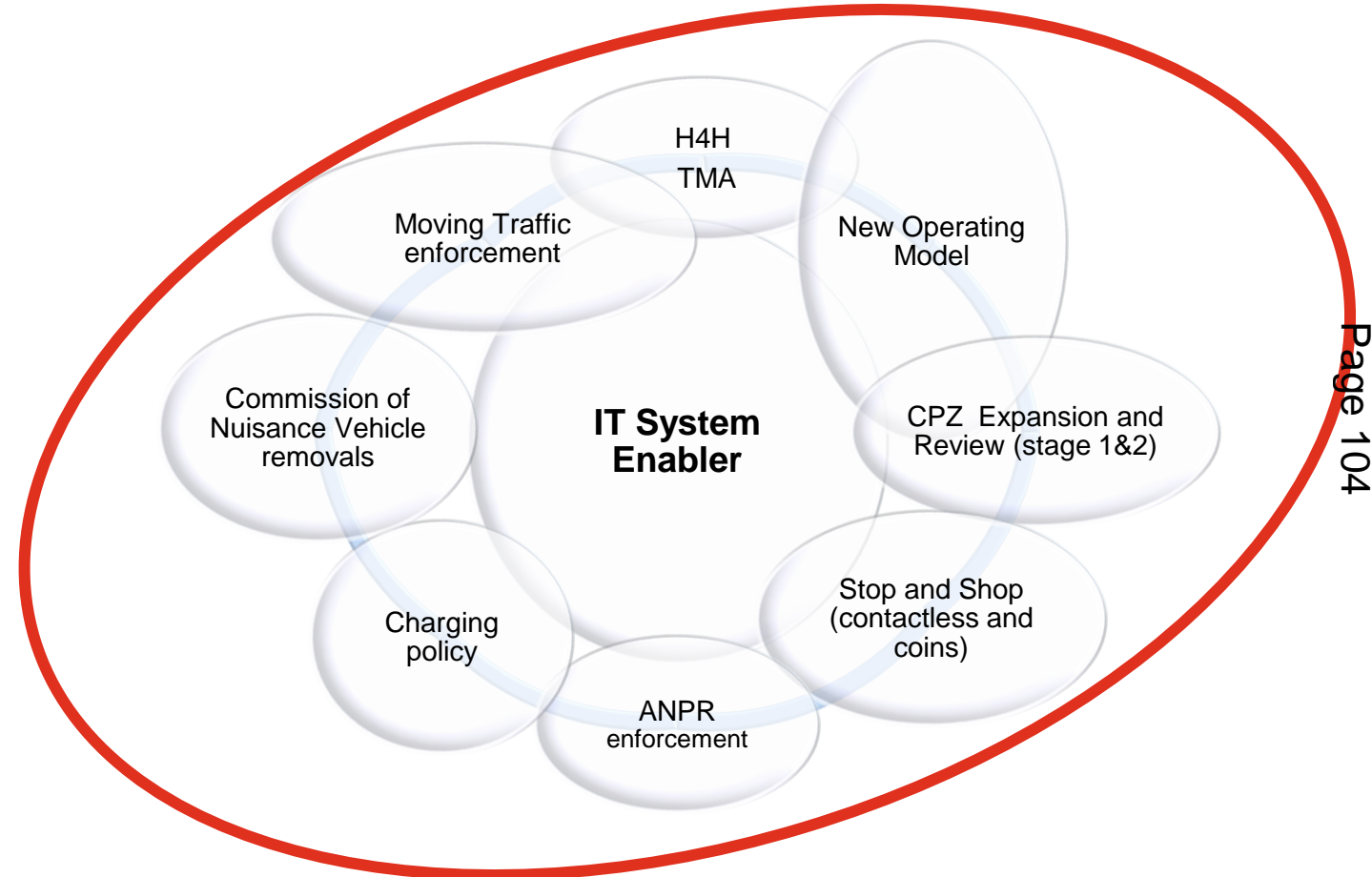
8. Local Government (Access to Information) Act 1985

- Controlled Parking Zone Policy March 2020
- Contract Award – Nuisance Vehicle Contract October 2019
- Parking Permits and Charges – Ultra Low Emission Zone (ULEZ) Readiness
- Implementation of recommendations from the Review into Blue Badges and Supporting Better Access to Parking for Disabled People September 2021.

Parking Management Information System (PMIS)

Update for Environment and Community Safety Scrutiny Panel

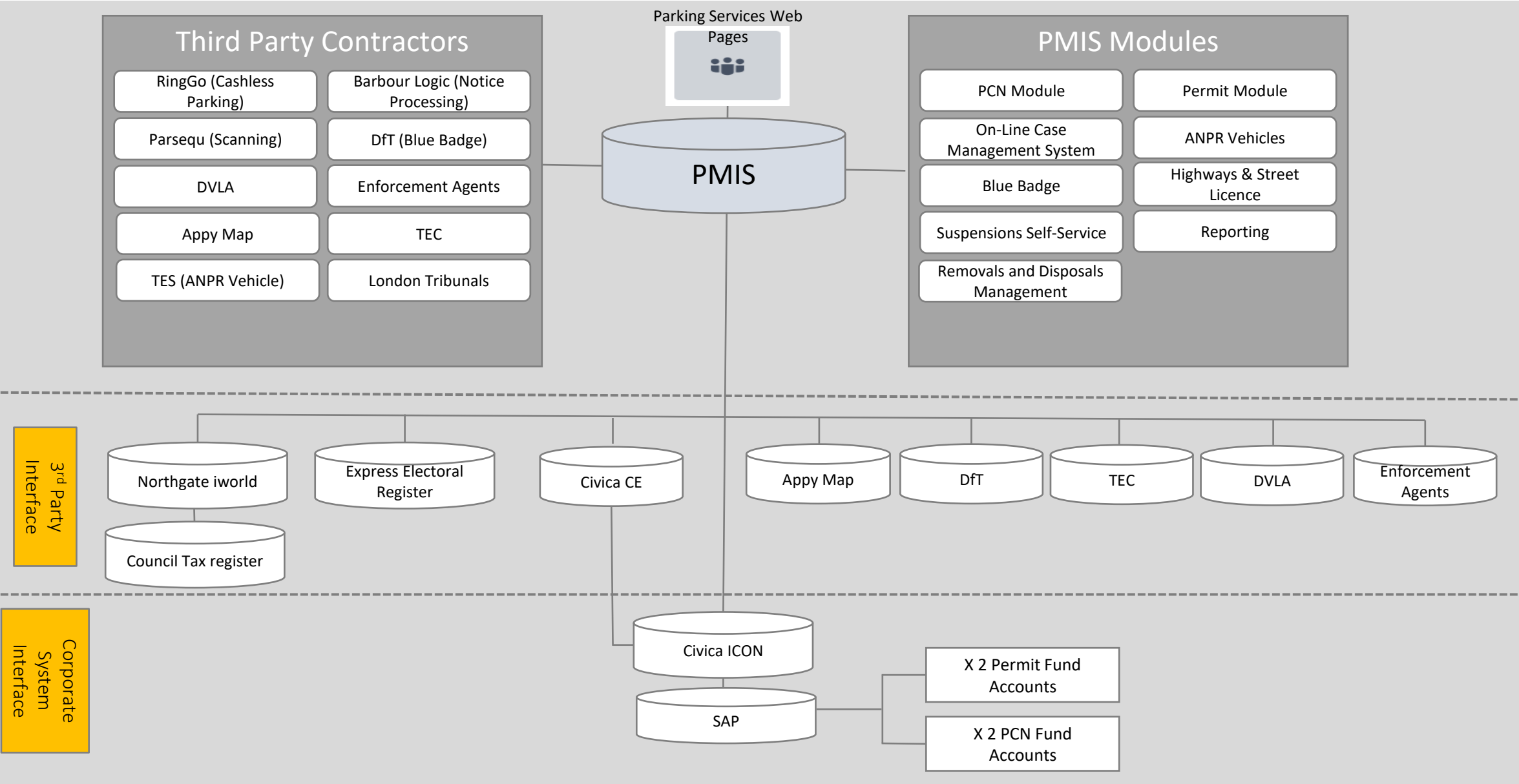
- The PMIS is pivotal to running the service and underpins all parking activities and parking income – an annual parking income budget of £26m. PMIS will unlock new ways of working which will improve the use of resources and drive out further income. PMIS is the enabler to achieve parking strategy MTFS savings and deliver back office efficiencies.
- Developed a bespoke, innovative and complex service specification that will ensure the new parking system is sustainable for the next ten years.
- A dedicated PMIS specialist project team (led by Parking and Digital Services) has been selected to work with the new IT supplier, WSP, stakeholders and partners to design, develop, configure, test and roll out a new Parking Management Information System.



The new system will deliver:

- End to end self-service, with automatic validation, of permits applications or other similar services i.e. suspensions & dispensations.
- Back-up support services for those who cannot self-serve.
- Electronic permits – no printing or use of paper
- An effective work flow management system aiding efficiency in back office processing and in the handling of 56,000 (annual) statutory representations and appeals.
- ANPR-enabled mobile enforcement applications, with real-time parking information and compliance checking, which will also support the use of ANPR enabled cars / bikes, reducing reliance on foot patrols. Those applications will also provide robust data, supporting an intelligence-led enforcement offer.
- Improve communications with frontline enforcement staff, enabling remote briefings as well as access to Council (intranet) information that is currently available to all office-based staff. It will improve efficiency by allowing access to electronic rosters, as well as annual leave booking etc.
- Flexibility and ability to develop and automatically apply complex charging models – permits and short-stay parking.

A Complex System Architecture



Programme Timetable

Phase 1 Enforcement - Go Live 6th April

- New handheld devices
- New printers
- Updated Parking PCN web pages
- Make a challenge using Online Case Management System (Ticket Viewer)
- Pay by phone, online or at the car pound
- Back office staff can respond to challenges and questions from motorists

Phase 2 Permits Go Live -2nd August

- RingGo Go-Live - 26th April
- Removals - 11th May
- CCTV - 27th June
- Permits Go-Live - 2nd August
- Blue Badge Case Management System - 12th August

Phase 3 Go Live - November

- Suspension
- Skip licencing
- Automatic number plate recognition vehicle

* *Review pre-project close*

Key Dependencies

- Go-Live dates subject to the parking system provider meeting development deadlines
- Parking system passing the Council's user acceptance testing (UAT)

Additional Workstreams

- Communications Strategy
- Change Management Strategy
 - Training and information for staff

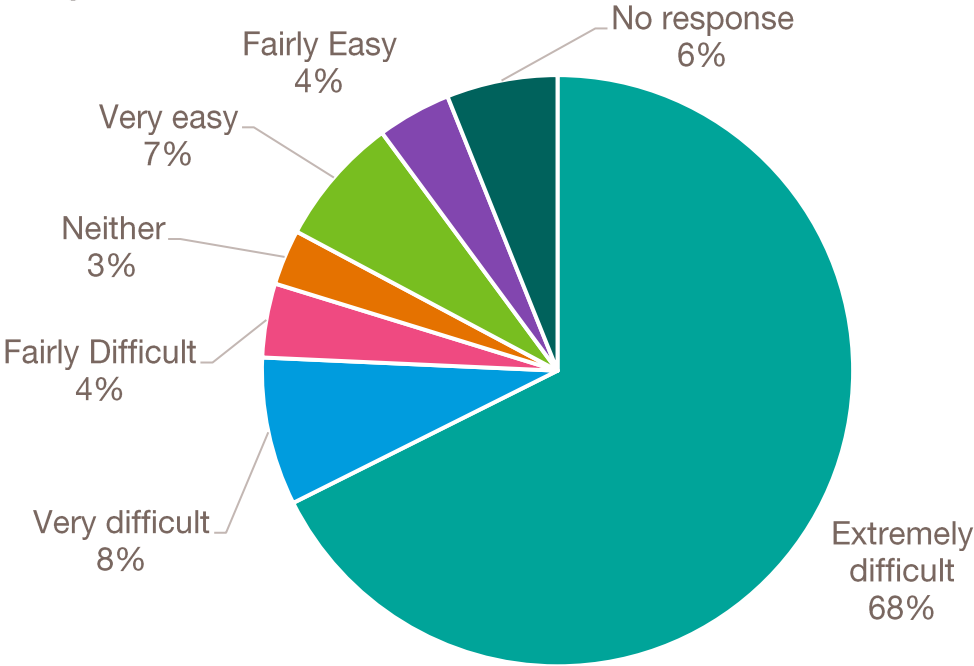
Work completed to date

ITEM	AREA
1	Parking UX/Accessibility/Design
2	Parking web pages (80+ pages) reviewed <ul style="list-style-type: none"> • PCN Video • Permit • Visitor Voucher
3	Civica Icon Payment Interface <ul style="list-style-type: none"> • PCNs • Permits • 25 Financial Processes Reviewed and Updated
4	Disaster Recover and Business Continuity Plan
5	Service Desk Management Procedure
6	Training material for 78 CEOs and 20 back office staff / Customer Service <ul style="list-style-type: none"> • H&S assessment completed • Covid-19 assessment completed • Training schedule in place
7	<ul style="list-style-type: none"> • DPIA Completed with SMEs and subject to approval by the Council's Information Governance Officer
8	Electoral Roll Data Sharing Agreement has now been provided by Counsel, supporting the Council's intention to share personal data between Parking Services and the Electoral Roll team.
9	New CCTV locations to improve recovery rate
10	Updating all parking-related documentation including all Notice Processing documentation (CCTV and on-street).
11	Finalised communications documents for go-live including letters to permit holder, and publicity material for switch from PBP to RingGo.

Improving the Customer Journey

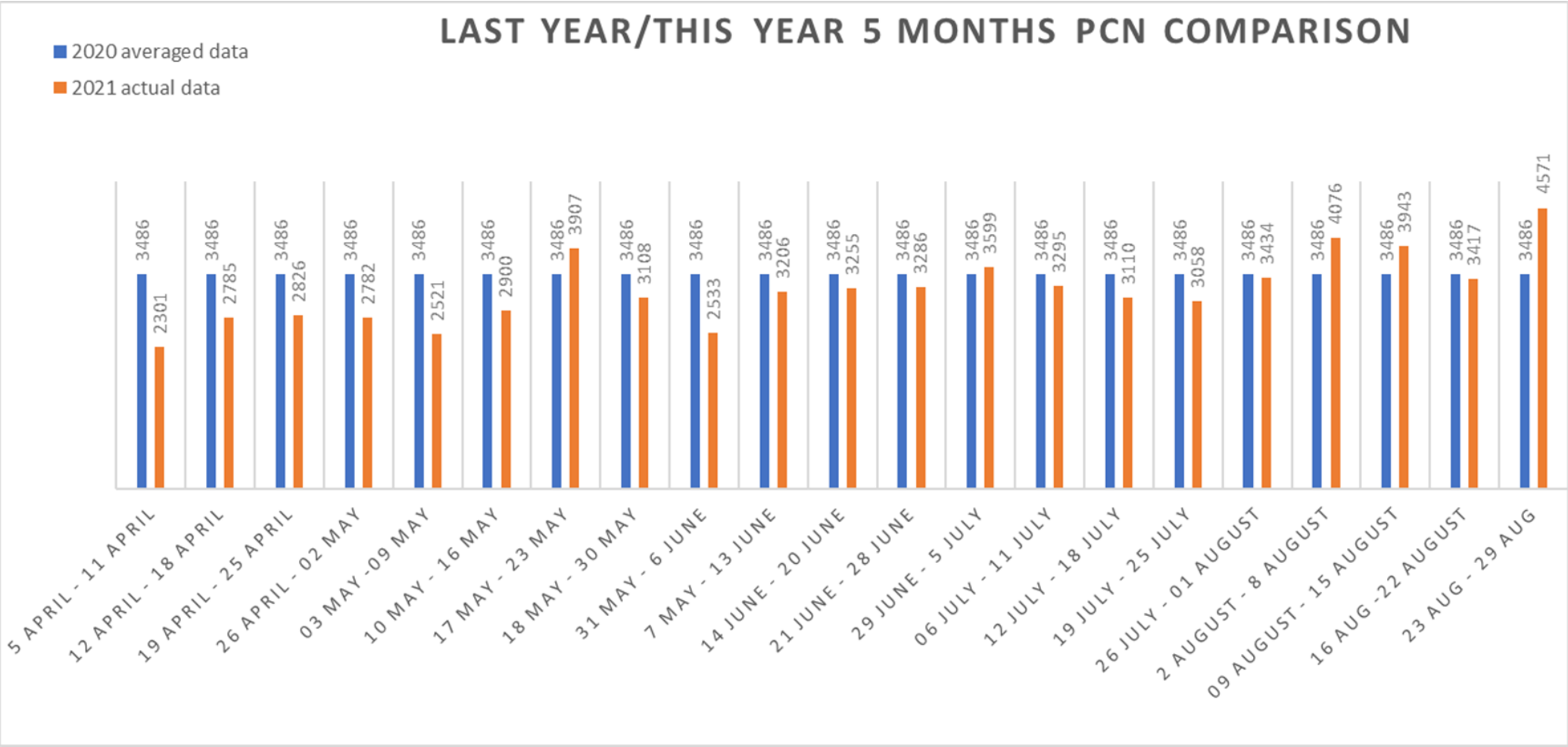
Parking web pages – 6 months service user feedback 2146 records from November 2019 to May 2020

Parking website ease of use



Extremely difficult / very difficult
Not accessible
Not easy to navigate
Not intuitive; not user-friendly
Can't check status of permit
Not enough time to challenge a PCN-timed out
Link Not working
Not enough instructions trying to challenge a PCN
System not allowing for comment
Difficulties in paying, don't know how to pay
Unclear how to apply
Can't buy a car park season ticket
No link on menu to challenge PCN
Not suitable for people with cognitive, aphasia or mobility issues
Not Ipad friendly, difficult to get files on Ipad.
No acknowledgement of receipt
Difficulty navigating how to pay for a PCN
Website not helpful for those wishing to ask questions

Number of PCNs issued by CEOs between April and August in 2020 and 2021



Enforcement data – Taranto

The table below shows the number of informal and formal representations received from motorists between 6th April 2021 and 31st August 2021.

Month	Number of PCNs issued (Taranto)	Challenges/rep/correspondence received
Apr	8540	1283
May	12851	2836
Jun	13655	3889
Jul	16599	4300
Aug	21122	2785
Grand Total	72767	15093

PCN recovery rate - Taranto

The table below shows the number of PCNs issued (via Taranto) and the current recovery rate between 6th April 2021 and 31st August 2021

Month	Cancelled PCN	Open PCN	Paid PCN	Total PCN issued	Recovery Rate
April	1164	2909	4467	8540	60.56%
May	1462	4317	7072	12851	62.10%
June	1343	5191	7121	13655	57.84%
July	1055	7477	8067	16599	51.90%
August	337	13203	7582	21122	36.48%
Grand Total	5361	33097	34309	72767	50.90%

Note:

- Recovery rates excludes PCNs issued in Civica CE and then paid by customers.
- There is a time lag between PCNs issued and customer paying for PCNs and therefore anticipate recovery rate to increase over the next few months.
- HGV 52(g) PCN issuance - 294 PCNs were issued using contravention 52(g) via Taranto up to 31st August 2021

Number of applications received / issued vs expired

Since going live with Taranto system on 2nd August 2021, the table below shows the number of applications that have been issued/and or received (up-to 31st August 2021) -v- number of expired permits.

Permit Type	Civica Number of permits expired (August 21)	Civica Number of permits issued	Taranto Number of permits issued/application received
Resident Permit	3968	615	3429
Resident Permit - Event Day Zone	593	403	885
Grand Total	4561	1018	4314

Permits issued - Taranto

The table below shows the number of different permits issued between 02/08/21 and 31/08/21.

Permit Type	Taranto Number of permit issued
Resident Permit. *	3429
Resident Permit - Event Day Zone. **	885
Resident Blue Badge Holder.	66
Resident Carers.	3
Business Permit - Borough Wide (All Zones)	8
Business Permit - CPZ Specific	26
Car Club (flexible)	1
Doctors Permit	1
Essential Service - All Zones, Vehicle Specific	1
Essential Service - Minister of Religion	1
Essential Service - Teacher	24
Permission to Park	273
Season Ticket - Brunswick Road Car Park, N17	1
Season Ticket - Bury Road Multi-storey Car Park, N22	1
Season Ticket - Stoneleigh Road (A) Car Park, N17	1
Season Ticket - Stoneleigh Road (C) Car Park, N17	1
Season Ticket - Summerland Gardens, N10	1
Season Ticket - Westerfield Road Car Park, N15'	1
Total	4724

* Resident permit data includes issued and in-progress permits

** Resident Permit – Event Day Zone data includes issued and in-progress permits

Number of customer applications auto validated and issued - up to 31/08/21

The table below shows the number of applications that have been auto validated and issued by the system:

- 2131 resident permits auto validated – Without back office validation
- 1826 visitor vouchers – mixture of auto-validated and validated by back office staff

Permit Type	Number of permit
.Resident Concessionary Qualification	2
.Resident Permit - Event Day Zone	622
.Resident Permit	2131
.Resident Qualification	1826
Essential Service - Voucher Permit	1
Permission to Park	275
Season Ticket - Brunswick Road Car Park, N17	1
Season Ticket - Bury Road Multi-storey Car Park, N22	1
Season Ticket - Stoneleigh Road (A) Car Park, N17	1
Grand Total	4863

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Environment and Community Safety Scrutiny Panel - Work Plan 2020-22

<p>▪ Scrutiny review projects; These are dealt with through a combination of specific evidence gathering meetings that will be arranged as and when required and other activities, such as visits. Should there not be sufficient capacity to cover all of these issues through in-depth pieces of work, they could instead be addressed through a “one-off” item at a scheduled meeting of the Panel. These issues will be subject to further development and scoping. It is proposed that the Committee consider issues that are “cross cutting” in nature for review by itself i.e. ones that cover the terms of reference of more than one of the panels.</p>		
Project	Comments	Priority
Low Traffic Neighbourhoods	Examining the Council’s plans to implement Low Traffic Neighbourhoods and examining pilot schemes that have been undertaken such as Liveable Crouch End to see how improvements could be made and how resident engagement could be improved. What lessons can be learned from other local authorities who have successfully implemented similar schemes?	

Date of meeting	Potential Items
3 rd September 2020	<ul style="list-style-type: none"> • Membership & Terms of Reference. • Appointment of Non-Voting Co-opted Member • Covid-19 Recovery update

	<ul style="list-style-type: none"> • Update on Youth at Risk Strategy • Gangs, Knife Crime & Hotspot locations. (MOPAC Performance update?). <ul style="list-style-type: none"> ▪ Transport hubs as hotspot locations for crime, especially Finsbury Park, Turnpike Lane, Seven Sisters and surrounding areas, particularly drug-dealing, knife crime. ▪ Update on the Ducketts Common stakeholder Strategic Group • Work Programme: To agree items for the work plan for the Panel for this year. • Cabinet Member Questions; Communities, Safety and Engagement (to cover areas within the Panel's terms of reference that are within that portfolio).
3 rd November 2020	<ul style="list-style-type: none"> • Cabinet Member Questions; Climate Change and Sustainability • Improving Air Quality & reducing pollution • Street Trees & Update on Queens Wood • Update on Single Use Plastics Policy • Recycling Rate • Update on Parks and Green Spaces Strategy • Parks Performance • Membership and Terms of Reference

	<ul style="list-style-type: none"> • Appointment of non-voting co-optee • Work Plan
Budget Scrutiny 10 th December 2020	<ul style="list-style-type: none"> • Budget Scrutiny • Police Priorities in Haringey & Community Safety Partnership Update; To invite comments from the Panel on current performance issues and priorities for the borough's Community Safety Partnership. • Update on Haringey & Enfield BCU integration. • Additional Police numbers in Haringey • Cabinet Member Questions: Communities, Safety and Engagement (to cover areas within the Panel's terms of reference that are within that portfolio).
4 th March 2021	<ul style="list-style-type: none"> • Cabinet Member Q&A – Cabinet Member for Transformation and Public Realm Investment. To question the Cabinet Member on current issues and plans arising for her portfolio. • Waste, recycling and street cleansing data • Update on Fly Tipping Strategy • Planned and Reactive Highways maintenance Performance • Work Plan update

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28 th June 2021	<ul style="list-style-type: none"> • Membership & Terms of Reference. • Appointment of Non-Voting Co-opted Member. • Work Programme • Cabinet Member Q&A – Cabinet Member Questions; Cabinet Member for Environment, Transport and the Climate Emergency and Deputy Leader of the Council • Strategic Transport update: <ul style="list-style-type: none"> ▪ TfL funding (post Covid) ▪ Reducing Congestion (Better west to east transport links) • Liveable Neighbourhoods
9 th September 2021	<ul style="list-style-type: none"> • Cabinet Member Q&A – Cabinet Member for for Customer Service, Welfare and the Public Realm. • Waste, recycling and street cleansing data. • Briefing on the changes to Waste Legislation • 12 month update on the recommendations from the Review into Blue Badges and Supporting Better Access to Parking for Disabled People. Inc update on implementation of designated disabled bays. • Update on Parking Transformation Programme (inc. the new permit system).

<p>11th November 2021</p>	<ul style="list-style-type: none"> • Cabinet Member Q&A – Leader of the Council (N.B. questions which related to the Leader’s portfolio which the Panel has responsibility for i.e. Community Safety and Serious Youth violence). • Police Priorities in Haringey & Community Safety Partnership Update; To invite comments from the Panel on current performance issues and priorities for the borough’s Community Safety Partnership.
<p>14th December 2021 (Budget Scrutiny)</p>	<ul style="list-style-type: none"> • Budget Scrutiny • Cabinet Member Q&A – Cabinet Member for Environment, Transport and the Climate Emergency and Deputy Leader of the Council. • Low Traffic Neighbourhoods including introduction of small schemes • Tree Strategy update – (Queen’s Wood, Parkland Walk [lessons learnt], staffing resources within Trees team, removal of street trees, funding for new trees)
<p>3rd March 2021</p>	<ul style="list-style-type: none"> • Update on CPZ coverage, Visitor permits and use of permits by staff • Update on Fly-tipping strategy • Overview of Traffic Management including enforcement of 20mph speed limit (Improving traffic flow, Reduction in HGVs and preventing rat running) • Cabinet Member Questions; Cabinet Member for for Customer Service, Welfare and the Public Realm

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