

**Report for:** Cabinet – 16<sup>th</sup> January 2024

**Title:** Estate Parking Management Scheme (EPMS) – Amendments

**Report authorised by:** David Joyce, Director of Placemaking and Housing

**Lead Officer:** Chris Vavlekis, Head of Estates & Neighbourhoods, 020 8489 3447, [chris.vavlekis@haringey.gov.uk](mailto:chris.vavlekis@haringey.gov.uk)

**Ward(s) affected:** All

**Report for:** **Key Decision**

**1. Describe the issue under consideration**

- 1.1 This report seeks Cabinet approval for amendments to the Estate Parking Management Scheme (EPMS), as approved at Cabinet on 8 December 2020 following the insourcing of the former Homes for Haringey into Haringey Council. This report also seeks approval for funding of the scheme as set out in section 11.
- 1.2 The current Estate Controlled Parking Scheme for Haringey estates is enforced by private contractors (Wing Security Ltd) under provisions of contract law based on terms and conditions displayed on signs at the entrance to each estate included in the scheme. The limitations on enforcement due to changes in legislation and guidance, described in more detail in section 4, have resulted in a scheme which is financially unviable for private contractors that rely on revenue from penalty charge notices (PCNs). Subsequently, there are parking problems on Haringey estates which cannot be addressed under the current arrangements.
- 1.3 A new Estate Parking Management Scheme (EPMS) was approved at Cabinet on 8 December 2020 (the 2020 Report), as described in section 6. This new EPMS will align parking enforcement on housing land with on-street parking, using powers provided to local authorities under the Road Traffic Regulation Act 1984. This would negate difficulties with parking enforcement described in section 4, allowing the Council to properly enforce parking restrictions on estates and collect PCN income. This will also allow an important service to be brought in-house to Haringey Parking Services from a private contractor.
- 1.4 The new scheme will follow the principle that those tenants who benefit from car parking provision will be making a financial contribution to reflect that benefit.

- 1.5 The new EPMS will require engagement with estate residents on the design of parking arrangements on their estate and subsequent statutory consultation for the introduction of traffic management orders (TMOs) needed to implement the new scheme.
- 1.6 There are, however, elements of the original 2020 EPMS proposal that require amendment:
- (a) Permit offer amended to introduce charges for estate resident parking permits in alignment with the charges for controlled parking zone (CPZ) permits and for estate parking permits set by other London Boroughs, to better address parking space availability pressures on estates (a limit of one estate resident permit per household)
  - (b) Permit structure amended to better align the permit offer to that being made to CPZ residents.
  - (c) Resident engagement: amended process of engagement with residents to better reflect the Haringey Deal – employing a resident-led approach to ensure they are fully involved in the process of change in introduction of the EPMS and have the opportunity to engage with wider issues.
  - (d) As the proposed permit offer includes changes to parking which affect practice or policy regarding housing management and the provision of services or amenities to Council tenants, consultation will seek the views of all affected estate residents including secure tenants, non-secure tenants and leaseholders in compliance (so far as secure tenants are concerned) with S105 of the Housing Act 1985.
  - (e) Following the engagement process and S105 consultation, further statutory consultation will be required as a prerequisite to any subsequent decision as to whether to introduce the TMOs prior to implementation and commencement of the EPMS.
  - (f) Approval of the amended EPMS proposal will ensure that, in addition to a financially viable service with the powers to achieve effective enforcement, the scheme will be better focused on resident priorities while ensuring greater consistency with CPZ permit provision.
  - (g) In summary, the amended EPMS will:
    - Deliver a resident-led scheme design focused on each estate.
    - Entail consultation to seek the views of all affected estate residents including secure tenants, non-secure tenants and leaseholders in compliance (so far as secure tenants are concerned) with S105 of the Housing Act 1985
    - Use traffic management orders (TMOs) under the provisions of the Road Traffic Regulation Act 1984. Enforcement will be managed using the powers granted by the Traffic Management Act 2004.

- Be run in-house by Haringey Council's Parking Services, using the Taranto parking management IT system.
- Provide a permit scheme which:
  - Reduces pressures on estate parking availability by limiting estate parking permits to one per household.
  - Households with multiple vehicles will be eligible to purchase CPZ permits, provided their property is not within a car-free development (with associated emissions-based charging and other surcharges to encourage fewer, lower emitting vehicles).
  - Ensure parking provision for residents who are either over the state pension age or have a disability.
  - Offers generic disabled bays, and designated disabled parking bays and adopts the same disabled parking policy as used in the on street CPZs.
  - Provides a full range of carers and support worker permits.
  - Will allow residents to arrange parking for legitimate visitors.

## **2. Cabinet Member Introduction**

- 2.1 The prevalence of abandoned vehicles, illegal parking, and permit fraud on Haringey's estates limits available parking space for estate residents. This new scheme will make estate parking fairer by guaranteeing every household access to one parking permit, providing dedicated disabled parking bays to those who need them, ensuring the swift removal of abandoned cars, and preventing trespassing.
- 2.2 Enforcement of the current scheme, provided by a private company, has become ineffective due to changes to legislation and guidance. There are more than 150 estates included in our current parking scheme but, unfortunately, they are not working for all residents.
- 2.3 The new scheme will be introduced using traffic management orders and enforced by our Parking Services' civil enforcement officers. By insourcing this service, the Council can monitor estate parking more frequently and more effectively. Bringing this service under the direct control of the Council, rather than contracting it out to a private company, is in line with the Council's Corporate Delivery Plan which seeks to provide joined up services that are more accountable to residents.
- 2.4 A limit of one permit per household is proposed to reduce parking pressure on estates and discourage excessive car use in line with our climate and air quality commitments.
- 2.5 To allow social care staff, NHS health professionals, charity, or not-for-profit employees to provide care to residents, the existing Care at Home parking permit will allow parking both on streets and on estates. This is intended to make the parking process more straightforward by bringing estate parking in

line with parking across the borough – meaning there will no longer be a need for two separate permits.

- 2.6 The Council aims to ensure that this policy change does not financially burden estate residents, so permits will be available for less than 14 pence a day. The permit charge is in place solely to cover to cost of the scheme. Under the current scheme, all residents contribute to the cost of upkeep - in this new scheme, only those who use parking bays will pay for parking bays. Parking permits for Blue Badge holders and carers will be free of charge.
- 2.7 We have committed to review the parking schemes annually - this will ensure that we can work with residents to resolve any teething problems or issues should they arise.
- 2.8 In line with the Haringey Deal, this paper gives the green light to start meaningful engagement, where the Council and residents work together to design a parking scheme that benefits everyone.

### **3. Recommendations**

3.1 It is recommended that Cabinet:

1. Notes that, before a final decision to implement the proposals may be taken, any representations submitted to the Council following consultation under s105 Housing Act 1985 must be considered; and delegates authority to the Director of Placemaking and Housing, following consultation with the Cabinet Member for Housing Services, Private Renters and Planning, to consider any representations which have been submitted as a result of S105 consultation and then to take the decision as to whether to implement the EPMS scheme.
2. Notes that Parking Services will assume the responsibility for the operational management and maintenance of the scheme under the provisions of the TMOs, as approved in the 2020 Report, included as Appendix 6 to this report.
3. Approves the proposed EPMS permit offer, as shown in Appendix 1, including new charges for estate resident parking permits, and the required capital expenditure, to be put forward in the 2024 to 2029 HRA Medium Term Financial Strategy (MTFS) budget report for Cabinet in February 2024.
4. Approves the implementation costs as outlined in Appendix 2.
5. Notes that Parking Services, in partnership with the Housing Engagement Team commissioned by Housing Services, manages consultation and engagement with estate residents (which is consistent with Cabinet's decision to approve the 2020 Report, included as Appendix 6).
6. Approves, for all affected housing estates, the amended resident engagement resource model and process, outlined in Appendix 3, which delivers a resident-led scheme focused on each estate, and which will be

utilised to enable the Council to comply with its duty to consult under S105 of the Housing Act 1985.

7. Delegates approval of consultation materials to the Director of Placemaking and Housing.
8. Recommends that statutory consultation, for estate parking TMOs, as outlined in Appendix 3, takes place following the engagement process and that recommendations following statutory consultation are then taken to Cabinet for approval.
9. Agrees development of a new estate parking policy, aligned to the Council's CPZ policy, subject to consultation and engagement to be submitted for Cabinet approval later in 2024.
10. Agrees that the Estate Controlled Parking Scheme adopts the same Disabled Parking Place Policy as used by the CPZ Parking Scheme.
11. In the event that Wing Security Ltd remains operational at the relevant time, notes and approves that the Council shall undertake the prescribed process under the Transfer of Undertaking (Protection of Employment) Regulations 2006 (TUPE) for the insourcing of parking enforcement staff.

#### **4. Reasons for decision**

- 4.1 The current Estate Controlled Parking Scheme (ECPS) is enforced under contract law, with terms and conditions for parking displayed on signs on estates included in the scheme.
- 4.2 The ECPS has become ineffective following the introduction of the Protection of Freedoms Act 2012 and changes to government guidance with vehicle keeper information no longer being provided by the Driver and Vehicle Licensing Agency (DVLA) to private contractors on private land owned by local authorities in London. This means there is no mechanism to contact vehicle owners following issue of penalty charge notices (PCNs) for contravention of parking rules on the estates, with the result that we are unable to effectively collect from PCNs issued. This has also had an impact on the ability to remove abandoned vehicles under tenancy and leaseholder agreements.
- 4.3 These limitations on enforcement have resulted in a scheme which is financially unviable for private contractors that rely on revenue from PCNs. Subsequently, there are parking problems on Haringey estates which cannot be addressed under the current arrangements.
- 4.4 This led to the Council's enforcement agent for estate parking, Wing Parking Ltd., ceasing operation in December 2022. An extension to the enforcement contract has been arranged with the parent company, Wing Security Ltd. to the end of May 2024. Officers are currently reviewing and discussing the possibility for an extension to the start of the new EPMS, pending agreement from the contractor and all parties concerned. Wing Security Ltd currently employs three

enforcement staff; any enforcement staff would need to be given the option to transfer to Haringey Council's Parking Enforcement Team via the TUPE process if Wing Security Ltd is in operational up to the time enforcement operation is assumed by the Haringey Council Parking Enforcement Team.

- 4.5 A traffic management order (TMO) based scheme is the preferred solution because it is the only option which meets the aims of the estate parking review to deliver a financially viable scheme with the powers to effectively control parking and meets residents' needs as well as assisting in tackling the climate change emergency. In addition, a TMO scheme is the Department for Transport's recommended solution and is operated successfully by neighbouring boroughs including Enfield and Islington.
- 4.6 Bringing the delivery of estate parking enforcement in-house to Haringey Council's own Parking Service meets the objectives of the estate parking review established by Cabinet in the 2020 Report and will not be subject to the limitations which affect the private enforcement of the current EPMS. This will allow Haringey Council to share resources and expertise in a sustainable way to generate efficiencies and savings. In addition, estate parking management will benefit from the improvements delivered by the Parking Transformation Programme including new IT systems, online offers and resource management.
- 4.7 Income generated by permits issued on housing land, and the costs of setting up and managing the scheme must be accounted for within the Housing Revenue Account (HRA) charges. Income generated from enforcement activities and the costs of enforcement are accounted for within the Parking and Highways Budget within the General Fund.
- 4.8 The financial assessment presented in Appendix 2 indicates that income generated by permit sales will be accounted for in the HRA and PCN income will be accounted for in the Parking and Highways Budget, within the General Fund.
- 4.9 Following Cabinet approval of the [EPMS in the 2020 Report](#), presented as Appendix 5, a number of wider changes have taken place which necessitate a review of what the EPMS will deliver, and how the EPMS scheme designs will be determined.
- 4.10 Housing provision previously delivered through Homes for Haringey has now been brought back into the Council. Delivering housing provision through the Council provides an opportunity to better align housing and related services with delivery through one organisation. This includes how parking services and estate parking schemes are designed and delivered.
- 4.11 As part of this transition, the Haringey Deal launched in November 2022 provides an opportunity to reshape how residents are involved in the specifics of EPMS scheme design on their estate. Engagement with residents feeding back to a scheme design will result in a more effective and sustainable service – ensuring schemes better meet the needs and priorities of estate residents.

- 4.12 As the proposal includes changes to parking which affect practice or policy regarding housing management and the provision of services or amenities to Council tenants, consultation will seek the views of all affected estate residents including secure tenants, non-secure tenants and leaseholders in compliance with S105 of the Housing Act 1985.
- 4.13 A further wider change is the implementation in 2021 of the new Taranto parking management IT system, upgraded in November 2023. To ensure there is consistency firstly in permit offer, and secondly in the customer journey to apply for and manage permits, there are some amendments required to specific aspects of the original EPMS permit proposal.
- 4.14 In addition, existing measures will be retained to protect vulnerable groups such as the disabled and elderly to ensure that they have access to a free estate parking permit and to align the scheme with the Disabled Parking Place Policy as used by the CPZ Parking Scheme. The proposal includes measures to tackle the climate emergency by financially incentivising households to consider the number of vehicles they own.

## 5. Alternative options considered

- 5.1 Alternative options to the proposed new EPMS have been considered. These follow from changes in circumstance since the 2020 Report, including the insourcing of the Council's housing stock from Homes for Haringey into Haringey Council.
- **Do Nothing:** this option was discarded as effective parking management is needed to control parking arrangement on estates, particularly where there is high demand for parking space, low availability of parking spaces and/or issues with non-residents taking up parking space, such as displacement from nearby CPZs or demand from events.
  - **Keep existing estate parking arrangements:** this option was discarded as the existing arrangements are difficult to enforce, ineffective, and do not meet the needs of residents or the political and financial objectives of Haringey Council.
  - **Provide traffic management orders for existing scheme arrangements:** This option would have transferred the current arrangements as is to the Haringey Council Parking Enforcement Team. This was discarded as permits would remain free of charge with no mechanism to recoup the cost of implementation including required consultation and provision of new signage. The current permits also do not align with the existing on-street CPZ offer resulting in different customer journeys for residents of estates and other Haringey residents.
  - **Introduce the scheme as originally set out in the 2020 Cabinet Report:** this was discarded as changes to Council policy, such as the Haringey Deal, needed to be included in the approach to resident engagement for the new scheme (see below for the options considered for resident engagement).

Costs of these measures and to introduce the scheme also needed to be reviewed.

5.2 Alternative options for resident engagement have been considered:

- **Continue with the previously approved engagement approach:** the previous approach incorporated a pre-defined structure and content, with limited scope for residents to shape the process. In revising the proposed approach for resident engagement, it is recognised that housing insourcing brings it within scope of the Council's Haringey Deal approach – meaning a co-design approach should be taken to fully engage residents throughout the process.

5.3 A range of options have been considered regarding the most appropriate and effective permit proposal for estate parking. These include the following specific considerations:

- **Continue previously approved permit proposal:** the option to continue the previous permit proposal as approved in 2020 has been impacted by 2 key changes since approval. Firstly, the insourcing of Homes for Haringey in 2022 and, secondly, the introduction of a new parking management IT system in 2021. Each of these factors affects the validity of the previously approved proposal. Firstly, having a different permit offer (in terms of permits offered and associated application customer journeys) is not reflective of a cohesive, unified organisation. Secondly, some specifics of the original permit proposal would not have been deliverable within the new parking management IT system without system development. For these reasons and others noted above, the original proposal is not being pursued.
- **Closest alignment to CPZ permits:** In aligning the permit proposal to CPZ provision, a balanced approach has been taken, accounting for estate parking and residents. An alternative approach would be to fully mirror the CPZ permit offer and pricing structure (albeit with reduced charges overall): this would include, for example, applying charges to resident permits to include a base charge plus surcharges (for second and subsequent vehicles and diesel surcharges).
- **Higher limit for (or unlimited) estate resident permits:** the proposal of the limit of one estate resident permit per household recognises the parking pressures on estates and allows each household a fairer chance of being able to park on their estate, while also contributing toward carbon reduction by encouraging use of alternate modes of transport and/or lower emitting vehicles. An alternative would be to have a higher limit – or no limit at all – on estate resident permits per household, thereby introducing potentially higher pressure on estate parking with reduced fairness.
- **Variations of assumed permit demand:** it is not possible to definitively know the behavioural impact of the introduction of a charged permit scheme – i.e., how many of the current free permits will translate into future charged permits. In permit income modelling underlying the financial model (Appendix 2), a conservative approach has been taken – assuming a 30% reduction in the number of permits issued (applied to all permit types where



there is a known current volume). It may be the case that greater demand is realised following implementation – with this increased revenue improving HRA income.

- **Adopt CPZ costs for Estate Resident Parking Permits with no discount:** the proposed limit of one permit per household and limitations on the availability of parking space on the estates mean that residents may also need to buy CPZ permits to park. The proposal to offer Estate Resident Parking Permits at a discounted rate mitigates the cost impact of this to residents.

## 6. Background information

- 6.1 Haringey Council has operated an Estate Controlled Parking Scheme (ECPS) since 1998. With the establishment of Homes for Haringey in 2006, day-to-day management of the scheme was a function delegated to Homes for Haringey under the management agreement that applied at the time. The ECPS operates on more than 150 estates boroughwide covering over 11,000 properties and garages.
- 6.2 The limitations on enforcement described in Section 4 have resulted in a scheme which is financially unviable for private contractors that rely on revenue from PCNs. Subsequently, there are parking problems on Haringey estates which cannot be addressed under the current arrangements. The proposed new scheme would be enforced by Haringey Council's in-house Parking Service, as previously approved by the 2020 report. As this scheme would be implemented using TMOs, it would not be subject to the limitations on enforcement of the current scheme.
- 6.3 Estate resident parking permits for the current ECPS are paper permits provided free of charge to residents of the estates where their vehicles are registered to their address. Residents who are disabled may also apply for a Haringey disabled resident parking permit which would allow them to park in a disabled parking bay on the estate without displaying a Blue Badge.
- 6.4 Visitor permits are available to residents as
- one hour scratch cards (limited to 32 hours per 12 month period),
  - weekend parking permits (limited to 3 permits in any 12 month period)
  - two-week visitor parking permits (1 permit in any 12 month period).
- 6.5 Concessions are available to residents over 60 years old or registered disabled people, which double the number of hours/permits available in a 12 month period.
- 6.6 These permits may be applied for via an online form or at customer service locations (Wood Green Library, Marcus Garvey Library).
- 6.7 Enforcement has been delivered by an external contractor, Wing Parking Ltd. (Wing), since 1999 under contracts procured by Haringey Council. Wing Parking Ltd ceased trading on 31 December 2022. A contract extension has

been arranged with the parent company Wing Security Ltd. to continue enforcement on the estates until May 2024.

- 6.8 Officers are currently reviewing and discussing the possibility for a further extension up to the start date of the new scheme pending agreement from the contractor and all parties concerned.
- 6.9 Wing Security Ltd currently employs three enforcement staff who work on the existing contract. These individuals could potentially have employment rights with Haringey Council subject to the timing of events. If Wing Security Ltd continues to provide the enforcement service until it is brought in-house, its staff assigned to the service will be offered the opportunity to transfer to Haringey Council's Parking Enforcement Team automatically by operation of TUPE. They have the option not to transfer and, if they so decided, they would not transfer to Haringey Council.
- 6.10 In 2018/19, at the request of Haringey Council, Homes for Haringey undertook an options appraisal to consider the possible solutions for addressing the apparent deficiencies in the ECPS. The research confirmed that a traffic management order scheme provides the powers required to meet stakeholder needs to improve enforcement, increase parking controls, encourage vehicle reduction, and promote modal shift in transport.
- 6.11 The options appraisal informed the proposal for an estate parking review which was approved by Cabinet in July 2019 with a proposal for a wide-ranging consultation and engagement exercise. This consultation – as required by S105 of the Housing Act 1985 - was undertaken in the autumn of 2019. The outcome of this review and consultation was presented in a report to Cabinet in December 2020, which proposed the new EPMS.
- 6.12 When approving the estate parking management review in July 2019, Cabinet set the following eight core objectives for any new estate parking management scheme:
  - (a) A scheme that does not place a financial burden on residents that do not use it.
  - (b) A scheme that can be operated in-house by Haringey Council Parking Services
  - (c) An enforceable and financially viable scheme, self-financing where possible.
  - (d) Where charges are necessary, aim to set them at a reasonable level and no more than the charges levied of controlled parking zones.
  - (e) A scheme capable of generating a net revenue, wherever possible, for reinvestment.
  - (f) A service that offers an improved range of customer access options.
  - (g) A solution that prioritises the parking needs of vulnerable and disabled residents and complies with the Council's wider policy on disabled parking.

- (h) A scheme that provides the enforcement options that both meets customer needs and that supports the greenest borough agenda, agenda, including:
- Rules to encourage a reduction in vehicles per household.
  - Rules to promote a reduction in carbon emitting journeys per household.
  - Anti-fraud measures, particularly around permit tampering and reselling.
  - Rules to stop non-residents and businesses abusing the parking.
  - A wider range of enforcement times that cover peak usage periods.
  - A wider range of enforcement options that address antisocial activities. including the abandonment of vehicles on estates.

6.13 These objectives agreed previously by Cabinet provide the framework for proceeding with EPMS programme. (see section 7.8 of the 2020 Report, included as Appendix 6 for more information.

6.14 There have been a number of factors behind the delay of the proposed new EPMS being introduced, particularly the effects of the COVID lockdown and the decision to bring Housing Services back in-house to Haringey Council.

## **7. The proposal for a new estate parking management scheme**

7.1 The proposals are to introduce a new Estate Parking Management Scheme (EPMS) operated via traffic management orders (TMO) using powers provided to local authorities under the Road Traffic Regulation Act 1984.

7.2 A new permit offer is proposed, based on alignment with the existing CPZ permit offer while considering the priorities outlined in the 2020 Cabinet report. This new permit offer is detailed in section 8.

7.3 As residents of Council estates may also need to purchase CPZ permits, due to limitations on availability of space and the proposed limit of one parking permit per household, the proposed permit offer is based on an initial 60% discount to the current CPZ resident permit cost to mitigate against this.

7.4 Using TMOs on housing land will align parking management policy across all Haringey Council land as this is how controlled parking zones are managed. The delivery and management of TMOs requires a range of resources with specialist expertise. The proposal is therefore to transfer estate parking management to Haringey Parking Services.

7.5 The new Estate Parking Management Scheme will use statutory powers to enforce the scheme rules. As income derived from enforcement is not collectable by the Housing Revenue Account (HRA), the scheme will be split between the HRA and the Parking and Highways Budget in the General Fund. Haringey Parking Services will deliver day to day management of the Estate Parking Management Scheme and will use the income derived from penalty

charge notices (PCNs) to meet any costs incurred. Income generated from the sale of parking permits will be collectable by the HRA and be used to cover costs relating to management of the permit scheme. The financial assessment at Appendix 2 indicates that both the Housing Revenue Account and Parking and Highways Budget will be able to meet the costs of service delivery over a long-term period.

7.6 Following implementation, Parking Services will assume the responsibility for the operational management, maintenance and costs of the scheme under the provisions of the TMOs.

## **8. Proposed permit offer**

8.1 The full proposed permit offer is presented in Appendix 1. This includes proposed costs for Estate Resident Parking Permits. This is a change to the proposal presented in the 2020 Cabinet Report (presented in Appendix 6), which included the offer of one free resident permit per household regardless of emissions level.

8.2 To offset the cost to implement the EPMS, costs for estate resident permits are proposed as set out in Appendix 1. These costs have been set based on:

- A review of costs for estate parking permits in neighbouring London Boroughs
- Consideration of the impact of charges on Haringey Residents and the objective for the 2020 Cabinet Report that charges for permit charges be kept to a minimum while ensuring that the scheme is financially viable.
- Consideration of the cost of CPZ permits and to encourage residents to purchase estate parking permits in preference to CPZ where possible to minimise impact of estate residents parking in CPZ areas on-street.
- Consideration of the limited number of parking spaces in estate areas.
- The impact on the HRA, as assessed via the financial model included in Appendix 2.

8.3 The following objectives included in the 2020 Cabinet Report have been prioritised when developing the EPMS.

- a) A scheme that does not place a financial burden on residents that do not use it.
- b) A scheme that can be operated in-house by Haringey Council Parking Services
- c) An enforceable and financially viable scheme, self-financing where possible.
- d) Where charges are necessary, aim to set them at a reasonable level and no more than the charges levied of controlled parking zones.
- e) A scheme capable of generating a net revenue. Consideration has been given to the limited availability of parking on Haringey estates and that the

impact of higher costs for resident permits could result in residents obtaining on-street CPZ permits in place of estate permits, which would increase parking pressure on street and result in lower permit income for the proposed scheme.

8.4 The proposed EPMS permit offer has been reviewed and updated to account for changes since the original Cabinet report (as noted in sections **Error! Reference source not found.** & **Error! Reference source not found.**). Updates to the permit offer are in three key areas:

- Resident permit offer: to address pressure on estate parking, limit estate resident permits to one per household, introduce a nominal charge for resident permits based on vehicle emissions; continue to offer CPZ resident permits to estate residents at standard CPZ charging excluding car free developments.
- Alignment with CPZ offer: better alignment of the permit offer and associated charging with the CPZ permit offer.
- Extended CPZ permit validity where appropriate: streamline permits for particular Essential Service Permit customers, providing services to residents across estates and street properties – such that one permit allows parking on estates and streets. These permits are for use by NHS health professionals, Haringey Council (e.g., social care staff), charity or not-for-profit employees who provide counselling or social care to resident.

8.5 Costs for estate parking resident permits in neighbouring boroughs include:

<b>London Borough</b>	<b>No. of emission bands</b>	<b>Annual estate resident permit charge (p.a.)</b>
Brent	Not banded	£50
Camden	4	£33.36 to £153 p.a. depending on vehicle emissions
Greenwich	Not banded	£57
Hackney	5	£42 to £156 p.a. depending on vehicle emissions plus £200; surcharge for diesel vehicles
Islington	7	£148.72 to £326.04 p.a., depending on vehicle emissions plus £160p.a. surcharge for diesel vehicles
Lewisham	Not banded	Annual resident permit charge on estates varies from £10 to £30 depending on the estate
Waltham Forest	3	£45 to £185 p.a. for each of first and second vehicles depending on vehicle emissions with higher charges up to £ 650 for a 3rd or subsequent vehicle.

*Table 1 - Estate parking in other London Boroughs*

- 8.6 The proposed new estate parking permits range from £49.72 to £86.24 per year across four permit bands based on vehicle emissions. There is an additional surcharge for diesel vehicles of £80 for each permit.
- 8.7 The full permit offer can be found in Appendix 1.

## **9. Resident consultation and engagement**

- 9.1 Previous consultations in 2019 and 2020 informed the 2020 Cabinet report. Information about these consultations can be found in Appendix 1.
- 9.2 The methodology for resident consultation and engagement was originally set out in the 2020 Report before the Council's housing stock that had been managed by Homes for Haringey was brought back under direct Council control in June 2022. The revised permit offer described in Appendix 1 needs to be communicated to estate residents.
- 9.3 As the proposed permit offer includes changes to parking which affect practice or policy regarding housing management and the provision of services or amenities to Council tenants, consultation will seek the views of all affected estate residents including secure tenants, non-secure tenants and leaseholders in compliance (so far as secure tenants are concerned) with S105 of the Housing Act 1985. Any representations submitted to the Council following consultation must be considered under authority that it is recommended be delegated to the Director of Placemaking and Housing.
- 9.4 Engagement with residents will ensure that residents are fully involved in the process of the introduction of the EPMS and bring it into scope with the Council's Haringey Deal approach. Details on the consultation methodology can be found in Appendix 3.
- 9.5 Following the engagement process, additional statutory consultation on the scheme under the provisions of the RTRA 1984 will need to take place before decisions may be taken as to whether TMOs for the parking restrictions may be introduced and implementation of the EPMS.

## **10. Implementing the new Estate Parking Management Scheme**

- 10.1 Given the nature of the proposed changes to the EPMS, a revised implementation programme is necessary. The programme has been updated to incorporate the following:
- Engagement will be more extensive to accommodate the required level of engagement across the multiple sites in scope. Appendix 3 sets out the nature of the engagement exercise, the various activities required for each estate, thereby necessitating a phased approach for implementation of all estates.

- IT system configuration: the required configuration to the Taranto parking management IT system to accommodate: all new permit types with associated locations and pricing; updated enforcement configuration; management of abandoned vehicles etc.; associated testing as required for these systems changes.
- Customer journey: assessment of the customer journey for estate residents, particularly for permits, ensuring greatest consistency with wider Council customer journeys – impacting Taranto IT system configuration, website updates, all associated communications etc.
- Change management: impact assess and manage all associated changes affecting internal stakeholders – particularly with regard to Customer Services.
- Policy: ensuring all related policy documentation and associated procedures are updated to capture, in particular, changes to permits and enforcement on estates.
- Communications: develop and implement a comprehensive communications strategy for all stakeholders, to encompass all stages of engagement, implementation, and post-implementation activities.
- Site surveys: to encompass all required surveying activities, review, and amendment of site designs.
- Statutory consultation: development of all required TMO schedules, the required consultation activities for statutory consultation.

10.2 The below table provides an overview of the high-level programme milestones of the provisional implementation programme.

Milestone	Activity	Commence	Completion
1	Project initiation document (PID) approval		January 2024
2	Cabinet approval		16 Jan 2024
3	Design of resident engagement / consultation and materials	January 2024	February 2024
4	Pre-engagement	January 2024	March 2024
5	Informal engagement priority estates	March 2024	May 2024
6	Informal engagement all other estates	June 2024	December 2024
7	S105 consultation	January 2025	March 2025
7	Customer journey review & approval		January 2024
8	Taranto IT system specification approval		April 2024

Milestone	Activity	Commence	Completion
9	Taranto IT system change control notice (CCN) approval		April 2024
10	Taranto IT system testing & sign off		May 2024
11	TMO - Statutory consultation process priority estates	July 2024	October 2024
12	Works on site priority estates	October 2024	December 2024
13	Go live (priority estates)		December 2024
14	TMO - statutory consultation process all other estates	October 2024	January 2025
15	Works on site	February 2025	June 2025
16	Go-live (all other estates)		Summer 2025

*Table 2 - High level milestones*

## **11. Programme implementation costs & income models**

- 11.1 The current Estate Controlled Parking Scheme (ECPS) became harder to enforce with the introduction of the Protection of Freedoms of Act 2012.
- 11.2 When the scheme was introduced, it was self-funding at no additional cost to the HRA. However, as time progressed, changes to legislation and guidance resulted in the scheme costing the HRA as show in section 14.2.
- 11.3 Two potential income streams are being considered in this new scheme. Permits and fee incomes are estimated to generate a net average revenue of £372,680 per annum, over a 5-year analysis period from the start of the new scheme.
- 11.4 Parking enforcement incomes via penalty charge notices (PCNs) are estimated to generate approximately a net £540k per annum over a 5-year period from the start of the scheme.
- 11.5 Future net income from permits will be wholly attributed to the HRA and future net income from PCNs to the Parking and Highways Budget.
- 11.6 Permit income estimates are based on projected permit volumes and proposed permit prices.
- 11.7 Assessment assumes there will be a 30% reduction in demand for specific permits, given that permits were previously non-chargeable. Future permit income is set out in Appendix 2.
- 11.8 The ongoing operational cost of enforcement will be funded from the Parking and Highways Budget using the projected income from issuing and collecting PCNs on estates. The annual PCN income will be used to pay the scheme's annual operating costs. This includes a requirement for additional civil



enforcement officers (CEOs) to effectively patrol the estates -this could include enforcement staff transferring from Wing Security Ltd via the TUPE process should they continue to manage the enforcement operation up to the point of transfer of the service to Haringey’s Parking Enforcement Team. Any remaining enforcement staff (or all if no Wing staff transfer) would be recruited.

- 11.9 It is estimated that the cost of implementing this scheme will be approximately £1.24m.

Table 3 summarises the different elements contributing to the overall project implementation costs, over a two-year period. These are one-off costs and will be funded by the HRA.

Area	Implementation costs over three years (£)
EPMS implementation (IT, surveys, estate signs and lines, TMO production, Appyway Estate Parking Module set up and configuration)	£496,999
Project management resources	£510,936
Consultation and Engagement	£233,000
<b>Total</b>	<b>£1,240,935</b>

*Table 3 – Implementation Costs*

- 11.10 Based on current permit cash flow projections (see Appendix 2), the payback period will be 7 years (2029/30).
- 11.11 It is anticipated that there will be a reduction in the general permit applications against current volumes, given that permits were previously non-chargeable. The detailed modelling underpinning this report will be the subject of regular review.
- 11.12 Historical PCN volumes and payment data have been used to project future PCN volumes and income for the scheme. This will be monitored on a monthly basis.

## **12. Contribution to the Corporate Delivery Plan 2022-2024 High Level Strategic Outcomes**

- 12.1 The approach for the new ECPS contributes to Theme 1 of the Corporate Delivery Plan: “Resident experience, participation and collaboration”, by encouraging inclusive public participation, and enabling community participation through adoption of the Haringey Deal. Insourcing of parking enforcement from Wing, a private company, to the Council’s own parking enforcement service also contributes to this Theme.
- 12.2 Integration of estate parking management with on-street parking management contributes to Theme 2 of the Corporate Delivery Plan “Responding to the climate emergency” and enables retention of access to disabled parking.

### **13. Carbon and Climate Change**

- 13.1 Motor vehicles contribute to climate change via the emission of greenhouse gases, such as CO<sub>2</sub> and other pollutants including NO<sub>x</sub> and particulates.
- 13.2 The introduction of emissions based permit charging for parking in estates by residents, visitors, contractors and Council staff is intended to encourage a switch to vehicles which produce less pollutants and greenhouse gases while in use, which will support the carbon reduction targets in the Haringey Climate Change Action Plan. The limit of a single permit per household may result in estate residents reducing the number of vehicles they own.
- 13.3 Improvements to enforcement are expected to reduce the number of abandoned and illegally parked cars on the estates with a positive environmental impact.
- 13.4 The proposal to limit the number of estate parking permits to one per household is expected to have an impact on the number of vehicles parked on the estates.

### **14. Statutory officers' comments (Director of Finance (procurement), Head of Legal and Governance, Equalities)**

#### **Finance**

- 14.1 The existing estate parking is currently managed through an external contract procured many years ago. The contractor issues PCNs and collects the income. There is currently no charge for estate permits.
- 14.2 At its inception, this service was operated at no cost to the HRA (except for incidental costs such as signage replacement, vehicle removal, etc) for which there is a £71k budget for these items in the HRA. However, this budget was overspent in 2021/22 and 2022/23 by £6k and £24k respectively. Legislative changes have rendered the management of estate parking problematic and expensive.
- 14.3 With the proposed EPMS, LBH parking service will deliver day to day management of the estate parking scheme (both permit and PCN issuance).
- 14.4 Permit income, net of any costs, will be attributed to the HRA, as the scheme is on HRA land. The PCN income, net of cost, will be attributed to the Parking and Highways Budget.
- 14.5 The cost of enforcement will be met from the Parking and Highways Budget. Incidental and operational costs of running the scheme, such as maintenance of road markings, signs and mapping software will be funded from the HRA.

*HRA capital implication*

- 14.6 The total cost of implementing the proposed scheme will be £1.24m as shown in the table below. This will be financed by HRA borrowing. It is estimated that there will be a payback period of 7 years. The total cost of implementation will be added to the HRA capital programme expenditure and reflected in the 2024-29 MTFS for February 2024.

	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	Total
	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
CapEx financed by borrowing	254	859	128	-	-	-	-	1,241

*Table 4 – HRA Capital implication*

- 14.7 Estimated HRA income and expenditure from permits is as shown below:

	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	Total
	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Operating Costs	-	-	22	32	33	33	34	154
Financing costs	14	62	72	62	45	26	6	287
Operating income HRA (permits)	-	-	-202	-413	-421	-430	-438	-1,905
Net Expenditure/(Income)	14	62	-108	-318	-344	-371	-399	-1,464

*Table 5 – HRA Revenue implication*

- 14.8 The scheme is expected to contribute an average annual net income of £0.35m to the HRA. However, there is a risk of reduced HRA annual net income should the estimated income from parking permits fall below the projected level.

*General Fund revenue implication*

- 14.9 The issuance and processing of PCNs will be handled through the Council's Taranto system. It is anticipated that the cost of enforcing the EPMS will be an average of c£0.447m per annum once fully operational, there will be an average of c£0.540m PCN income once fully operational., and net income average net income of £ 0.093m per annum once fully operational.

*Table 6 – General Fund revenue Implication*

	2025/26	2026/27	2027/28	2028/29	2029/30
	£000's	£000's	£000's	£000's	£000's
Operating cost	218	434	443	451	460
PCN Income	-270	-540	-540	-540	-540
Net Income	-52	-106	-97	-89	-80

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## Procurement

14.10 Strategic Procurement note the contents of the report and recommendations in section 3 which do not require a procurement activity.

## Head of Legal & Governance

14.11 The Head of Legal and Governance has been consulted in the drafting of this report and has the following comments.

### *Traffic management orders*

14.12 The new controls will be introduced on an estate-by-estate programme. Each estate will first need to be carefully assessed and the exact status of each area to which the controls are to apply will need to be ascertained. The controls will be introduced by a number of individual traffic management orders made under the Road Traffic Regulation Act 1984 for both on-street and off-street car parking. It is possible that parts of some estates, although currently managed and maintained by Housing, are by operation of law highways maintainable at public expense and will need to be treated in terms of the orders necessary to control parking slightly differently, but in practical terms there need be no difference in the rules applicable unless there is some other reason to differentiate between parking areas.

14.13 Introduction of these controls will need to be the subject of public notice as set out in the Local Authorities Traffic Orders (Procedure)(England and Wales) Regulations 1996 in respect of each proposal, inviting representations and the Council will be obliged to consider those representations, in the light of the duty under Section 122 of the Road Traffic Regulation Act 1984 notwithstanding any previous consultation process carried out under the Housing Act (See below).

### *Consultation*

14.14 S105 of the Housing Act 1985 requires that secure tenants be consulted on these proposals; while there is (at this stage) no statutory requirement to consult with leaseholders and non-secure tenants, it is the Council's practice to do so.

14.15 Consultation with secure tenants in accordance with the Council's published arrangements (the "Arrangements") is required under s105 of the Housing Act 1985.

14.16 The Arrangements include:

- Provision of sufficient information to understand the proposals.
  - In writing by providing an Information Pack (including the Arrangements)
  - By a dedicated webpage on the Haringey website
  - By holding at least one meeting
- Arrangements for comment by providing:
  - A feedback form
  - An email address
  - A postal address
  - A telephone number
  - Publishing a date by when secure tenants should make their views known.

14.17 The Council's usual policy is for such consultations to last for a period of 6 weeks. It is however open to the Council to depart from that policy where it considers that proper consultation can be achieved in a shorter period.

14.18 Before making a final decision, the Council will consider and take conscientious account of all representations made by secure tenants in accordance with the Arrangements, and by other tenants and leaseholders as part of the consultation.

#### *Ring-fenced accounts*

14.19 There are two separate ring-fenced accounts within which the income and expenditure associated with the EPMS must be accounted; the Housing Revenue Account (HRA) provided for by s74 of the Local Government and Housing Act 1989, and the Parking and Highways Budget provided for by s55 of the Road Traffic Regulation Act 1984 (RTRA).

14.20 Broadly, income deriving from permits and parking charges generally are to be accounted for within the HRA; together with the costs of setting up and managing the scheme.

14.21 Income derived from enforcement of the EPMS must be accounted for within the (General Fund) Parking and Highways Budget under s55 RTRA, together with relevant enforcement expenditure.

#### **TUPE**

14.22 The proposals in the report at 6.5 could give rise to TUPE protection if there's a service provision change within the legal criteria.

- 14.23 Under regulations 3 (1) (b) (iii) and 3 (3) of the Transfer of Undertaking (Protection of Employment) Regulations 2006/246, TUPE will apply in a situation where activities cease to be carried out by a contractor and it reverts back to the contracting body, in this instance the Council and immediately before the change there is an organised group of employees which has as its principal purpose the carrying out of the activities concerned.
- 14.24 The effect of the Regulations if applicable, is that the Council will acquire the existing employees of Wing Security Ltd carrying out parking enforcement on their existing terms and conditions of employment with Wing Security Ltd. However, such employees would not be obliged to transfer to the Council.
- 14.25 Further analysis will need to be undertaken in order to determine whether the current arrangement with the contractor would attract TUPE protection for its employees if the service were brought back in house.
- 14.26 If TUPE applies, Wing Security Ltd must under the TUPE regulations provide the Council with certain information (employer's liability information) about the affected employees at least 28 days before the service is brought back in house. This is to enable the Council to comply with its duty to inform and consult affected employees. The duty to consult affected employees arises if the Council envisages taking measures which will affect the employees. Consultation must be with a recognised trade union of the affected employees (if there is one). If not, with a representative of the affected employees. Where there are fewer than ten employees, the employees can be informed and consulted directly.

### *Conclusion*

- 14.27 The Head of Legal and Governance sees no legal reasons preventing Cabinet from approving the recommendations in the report.

### **Equality**

- 14.28 The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:
- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act.
  - Advance equality of opportunity between people who share those protected characteristics and people who do not.
  - Foster good relations between people who share those characteristics and people who do not.
- 14.29 The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation.

- 14.30 Marriage and civil partnership status applies to the first part of the duty.
- 14.31 Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.
- 14.32 The equality implications of policy changes arising from the proposals have been considered and a full Equalities Impact Assessment undertaken prior to Cabinet considering these proposals (see Appendix 4).
- 14.33 No direct or indirect negative impacts are anticipated for people who share the protected characteristics. While the new scheme does introduce permit charges which could be expected to have a disproportionate effect on older people, those with a low socio-economic status, or people with disabilities or who may have mobility issues. This is mitigated by including provision to meet the specific parking needs of these groups by providing permits at no cost to the resident for parking in disabled bays, the provision of dedicated disabled bays, care at home permits and allowing the use of Essential Service Permits on estates.
- 14.34 The new scheme will follow the principle that those tenants who benefit from car parking provision will be making a financial contribution to reflect that benefit. The proposals are designed to ensure better management of parking for the benefit of all estate residents.

## 15. Use of Appendices

- Appendix 1 – Proposed permit offer
- Appendix 2 – Finance Model
- Appendix 3 – Consultation and Engagement
- Appendix 4 – Equalities Impact Assessment
- Appendix 5 – Estates included in the EPMS
- Appendix 6 – Cabinet Report 2020 – ‘Council Housing Parking Estate Changes’

## 16. Background papers

- 16.1 **Cabinet report of 8 December 2020** entitled ‘Council Housing Parking Estate Changes’ <https://www.minutes.haringey.gov.uk/mgAi.aspx?ID=65947>
- 16.2 **Cabinet report of 9 July 2019** entitled ‘Improving the management of Estate Parking - Approval to undertake formal consultation’  
<https://www.minutes.haringey.gov.uk/ielssueDetails.aspx?IId=66840&PlanId=0&Opt=3#AI61835>