Report for:	Cabinet - 16 January 2024
Title: Report	Feedback to statutory consultation on changes proposed to the Essential Service Permit scheme.
authorised by:	Barry Francis, Director of Environment and Resident Experience
Lead Officer:	Ann Cunningham, Head of Highways and Parking Ann.Cunningham@haringey.gov.uk
	Andrew Bourke, Parking Projects and Policy Manager Highways and Parking <u>Andrew.Bourke@haringey.gov.uk</u>

Ward(s) affected: All

Report for Key / Non-Key Decision: Key Decision

1 Describe the issue under consideration

- 1.1 The Cabinet authorised officers to proceed to statutory consultation on changes to the Essential Service Permit (ESP) scheme in March 2023. This parking permit scheme supports those who rely on car use to deliver essential services to residents. The main users of the scheme are local authority services, NHS health professionals, charities, faith groups, and organisations that provide healthcare, counselling, or social care to Haringey residents.
- 1.2 This report sets out the results of statutory consultation and seeks Cabinet approval to implement those changes, because of unresolved and pertinent objections to those changes.

2 Cabinet Member Introduction

- 2.1 It is important that our parking permit policies evolve to support the Council's ambitions to create healthier streets, reduce harmful emissions from transport and allow a fairer distribution of the kerbside.
- 2.2 The Council is committed to supporting the delivery of essential services to our residents. While sustainable transport options will always be preferred, we recognise that car use is essential to many service providers. The review of the Essential Service Permit scheme has achieved a balance that ensures its longer-term sustainability, as demand for kerb space grows. I am pleased that foster carers are now recognised by the scheme and that arrangements for schools offer an appropriate level of flexibility to support their smooth administration.

3 **Recommendations**

- 3.1 It is recommended that Cabinet considers and approves:
 - (i) Considers all feedback including objections to the proposed order, given during the 2023 consultation, as set out in Appendix 4 of this report
 - (ii) that the Council shall exercise its discretion to not cause a public inquiry to be called
 - (iii) an allocation of 20 parking permits to be issued to schools annually at a flat fee of £200 each, with an additional 10 available subject to a surcharge of £100 each.
 - (iv) Essential Service Permits issued to Council staff being transferable ('Team') permits, with provision retained for vehicle specific permits on a needs basis.
 - (v) access for regulated foster carers with children up to the age of 15 years to the subsidised ESP scheme.
 - (vi) the change to charges as proposed in Appendix 1.
 - (vii) the delegation of authority to the Head of Highways and Parking to take all consequent steps necessary to implement the proposed measures in recommendations 3(iii) to (vi).

4 Reasons for decision.

- 4.1 This scheme allows those delivering essential services to residents to park in controlled parking zones (CPZs). Schools can also access the scheme which is required to support recruitment and retention as well as the efficient operation of the school. The scheme is reviewed periodically to ensure that it remains aligned with the Councils wider transport policies.
- 4.2 This review sought to address residents' concerns about the impact of ESP holders parking on busy roads, without compromising the benefit of the scheme to users. The recommendations in paragraph 3.1 of this report also address the concerns raised by users in particular schools (who need more flexibility to support their wider recruitment and retention challenges) and registered foster carers (who have expressed a need for free or subsidised parking to support them when taking children to appointments). Allowing foster carers to obtain permits under the ESP scheme at the subsided charge is considered reasonable considering the many appointments carers are required to attend when fostering.

5 Alternative options considered.

- 5.1 Retaining current arrangements was considered. This would fail to address the dissatisfaction with the scheme. It would also prevent foster carers accessing the scheme.
- 5.2 Consideration was given to excluding schools from the ESP scheme. Those permits are mainly used by teaching staff to commute to work.

- 5.3 There are growing concerns about transport-related pollution and its impact on air quality near schools. The Council has implemented 23 School Streets to address the growing concerns about transport-related air pollution around schools and the impact on children's health. ESPs for schools inevitably contribute to traffic and congestion and the associated impact on air quality.
- 5.4 While some schools have car parks, others do not and distance from public transport hubs can make it difficult to carry materials or equipment. Those schools therefore feel that parking permits are an important aid to recruitment and retention. The Council aims to support the efficient running of those schools.
- 5.5 Consideration was given to implementing a 2-hour time limit for each ESP parking session. This was considered to minimise the impact of ESP parking on busy roads preventing extended or all-day parking. This would not meet the needs of all users, especially those involved in safeguarding.

6 Background Information

- 6.1 Following an extensive review of the ESP scheme, the Council agreed a number of changes to be implemented.
- 6.2 Those changes sought to address concerns and conflicts arising from the operation of the scheme, as well as aligning charges with current pricing policy. It also proposes that foster carers can access the scheme at the subsidised charge.
- 6.3 Statutory consultation was undertaken on changes to the existing Essential Services Permit. A copy of the Notice of Proposal is attached as Appendix 3. The changes proposed, which has taken account of objections, are set out in the paragraphs that follow.
- 6.4 ESPs issued to Council staff will be transferrable within their respective teams. Due to changes to working patterns. a shared 'Team permit' will suit the needs of most services. It is recognised that some services will need to retain vehicle specific permits and provision will be made for this in the revised operational policy.
- 6.5 This will help services manage the cost of those permits to services and is also likely to reduce the overall number in issue which will help with kerbside management.
- 6.6 ESP charges will increase by 10%, and a new £80 surcharge will apply to dieselfuelled vehicles (see Appendix 1). While all other parking permit charges are reviewed annually, ESP charges have not been reviewed for several years. This charge increase is required to help cover the costs of administration and enforcement. The introduction of a surcharge on diesel-fuelled vehicles will align this permit scheme with wider permit pricing policy. It is intended that ESP charges will be reviewed annually in future.

- 6.7 Regulated foster carers with children up to the age of 15 will be eligible to apply for an ESP at a subsidised charge.
- 6.8 Schools will be allowed an allocation of 20 transferable parking permit at a flat fee of £200 each, with a further allocation of 10 made available, subject to a £100 surcharge. This will introduce the flexibility required to ensure the smooth administration of the school. Those permits can be allocated to any category of school staff. It is expected that those schools will not have car parks or have very limited off-street parking places. Those schools will be Ofsted-registered and will need to have an up-to-date School Travel Plan.
- 6.9 The consultation proposed 10 transferable permits annually for schools at £200 each, with an additional 10 available at a surcharge of £100 each. After considering the objections to the consultation and the fact that schools will need to transition to the arrangement, the number of permits will increase to 30 per school 20 at £200 each and a further 10 at a surcharge of £100. The ESPs currently issued to schools will run through to expiry.
- 6.10 The proposed changes aim to strike a balance by allowing schools complete control over the allocation of those permits, while also ensuring that car use is not seen as more economical than sustainable transport options. The charges at £200 are roughly equivalent to £1 per working day. The charges at £300 (including the surcharge) represent £1.50 at day. It is important that any changes implemented do not result in an increase in demand for permits, hence the need to set a maximum allocation per school.
- 6.11 The Council has a duty under section 122 of the Road Traffic Regulation Act 1984 to "secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway having regard to securing and maintaining access to premises, preserving or improving the amenities of the areas through which school street runs, national air quality, facilitating the passage of public service vehicles and safety and convenience of people using such vehicles as far as practicable." Officers consider that the following are particularly relevant, given the Council's transport and air quality objectives:
 - a) The need to reduce car use and encourage sustainable modes of travel to improve air quality and the health opportunities of all residents.
 - b) The need to manage kerb space and reduce parking pressures in busy roads.
 - c) To address the growing concerns about transport related pollution and its impact on air quality near schools and the associated impact on children's health. School ESP parking inevitably contributes to congestion and poor air quality near schools.

Statutory consultation

- 6.12 Statutory consultation is required prior to changes being legally implemented to parking permit schemes so this was carried out from 21 June 2023 to 12 July 2023.
- 6.13 This process consisted of a Notice of Proposal (Appendix 3) published in the London Gazette and the Enfield and Haringey Independent. A copy of the notice, along with a copy of the draft orders and statement of reasons, were held on deposit at the Council and uploaded to the Council website, allowing members of the public to view and to make any comments or representations to the proposed changes.
- 6.14 As part of the statutory process, the views of the following statutory bodies were also sought:
 - AA
 - London Transport
 - Police (local)
 - Fire Brigade
 - London Ambulance Service
 - Freight Transport Association
 - Road Haulage Association
 - RAC
 - Metropolitan Police (traffic)
 - London Travel Watch
 - Haringey Cycling Campaign
- 6.15 A total of 17 responses were received to the statutory consultation. All responses were objections to the proposed changes. The objections have been summarised below, together with an officer's response on behalf of the Council in each instance.
- 6.16 The most common objection, raised by 13 of the 17 respondents, was a complaint against the overall cost increases for the ESP permit. Specifically, the 10% increase to all ESP charges and the addition of an £80 surcharge for diesel-fuelled vehicles.
- 6.17 It was felt by many that, due to the cost-of-living crisis, many essential services such as schools and healthcare workers are already facing several financial hardships which is making it increasingly difficult to carry out their daily duties. Raising the cost of the ESP would only exacerbate those pressures.
- 6.18 **Council officer response:** While all other parking permit charges are reviewed annually, ESP charges have not been reviewed for several years. The charge increase is therefore required to better align with the cost of administration and enforcement. A surcharge on diesel fuelled cars was introduced for most other permit schemes several years ago and the ESP scheme will now align with wider pricing policy. This surcharge is intended to promote the use of sustainable modes of transport and encourage a move to lower polluting cars, reducing transport-related air pollution, and promoting the health opportunities of all borough residents. Any parking surplus that is generated is ring-fenced and invested back into road maintenance, highway improvements, and concessionary fares.

- 6.19 The second most prevalent objection, raised by nine respondents, ties in closely to the objection to general cost increases. More specifically, the objection theme was against the proposal to remove schools from the reduced charge ESP scheme and allow an allocation of 10 transferable parking permit at a flat fee, with an additional 10 permits at a surcharge.
- 6.20 The third highest objection raised is that many members of school staff who currently utilise ESP permits commute from outside of the borough and therefore rely on driving as their method of transport, due to there not being enough off-street parking available at the schools themselves. As such, the limited number of permits combined with the increased cost of those permits would result in many school staff having to take alternative methods of transport, when commuting, which is seen as unreasonable due to logistical and financial factors. Furthermore, this would impede the schools' efforts to recruit new members of staff by adding a greater restraint on their ability to drive to that place of work.
- 6.21 **Council officer response:** The changes proposed to schools parking arrangements introduces the flexibility that schools require and will help the smooth administration of the school. The number of permits allowed is now increased to a maximum of 30, which will address supply concerns. The charges roughly equate to £1 per working day for the flat rate £200 permit and £1.50 a day for the additional permits at the surcharge. This is a reasonable and proportionate cost for those permits.
- 6.22 The proposed changes aim to strike a balance by allowing schools to continue to access the scheme, while also ensuring that car use is not seen as more economical than sustainable transport options. Consideration is also given to the section 122 duty in the Road Traffic Regulation Act 1984. It is important that any changes implemented to this scheme do not result in an increase in demand for permits, hence the need to set a maximum allocation per school.
- 6.23 The third most common objection raised on four occasions was in relation to the proposed change to make Council staff ESP permits transferrable across their respective teams. Three of the respondents are from the Haringey Young Adults Service, and one from the Haringey Educational Psychology Service.
- 6.24 It is felt that having to share permits across teams as opposed to using them individually would cause greater difficulties for teams carrying out their daily duties. For instance, workflow would be negatively impacted as the new ESP would add a physical and administrative burden on teams having to co-ordinate and share those permits between team members. It is felt that these services would need to put greater resources into ensuring that permit use is not over-scheduled throughout the respective teams.
- 6.25 **Council officer response:** Consultation was undertaken with services to ensure that any proposed changes to this scheme would meet their needs. It was recognised that, while the transferable permit would suit many services, vehicle-

specific and daily ESPs would be retained for those who require them. Applications for vehicle specific ESP will be considered on a needs basis.

- 6.26 Having considered feedback, including objections to the proposed traffic orders, as set out in Appendix 4 of this report, officers recommend that the changes consulted on are implemented.
- 6.27 Given the above, officers recommend that the Council exercise its discretion not to cause a public inquiry to be called on account of the effect of the order, the small number of objections which have been considered against the contribution that those changes will make to achieving a number of policy objectives and that holding a public inquiry would lead to expense and delay while being unlikely to alter the ultimate decision.
- 6.28 The report setting out all objections is attached as Appendix 4.

7 Contribution to the Corporate Delivery Plan 2022-2024 High-Level Strategic Outcomes

- 7.1 The content of this report reflects the aspiration of High-Level Outcome 2 under the Responding to the Climate Emergency Theme by delivering on the action of 'Adapt the Essential Service Permit to more fully reflect current needs'.
- 7.2 The changes proposed to the ESP scheme will also support the delivery of essential services to borough residents and the Council's Transport Strategy and Air Quality Action Plan objectives.

8 Carbon and Climate Change

8.1 Parking policy is a vital tool in reducing transport related carbon emissions and mitigating climate change. The changes recommended in this report will reduce the number of parking permits issued to this category of permit user, encouraging the use of sustainable transport.

9 Statutory Officers' Comments

Financial

- 9.1 This report is for Cabinet to approve the recommendations set out in paragraph 3 of this report. The suggested changes may not impact income. There has been a decline in income since the Covid-19 pandemic, mainly due to changes in working patterns.
- 9.2 The number of Essential Service Permits issued in 2022/23 were as follows:

Category	Numbers	
Schools	250	

Non-schools	260
Transferable	11
Faith Groups	21

This equated to circa £137k income. It is anticipated that the changes being made will have a neutral impact on income.

Legal

- 9.3 The Council may, under sections 45 and 46 of the Road Traffic Regulation Act 1984 (the 1984 Act), amend the classes of persons eligible for an Essential Service Permit and (b) vary applicable charges identified in the relevant traffic orders.
- 9.4 A consultation on the changes proposed to the essential permit scheme has been undertaken as required under the 1984 Act and the Local Authorities' Traffic Orders (Procedure)(England and Wales) Regulations 1996 (the 1996 Regulations) and the objections received set out in the Objection Report attached to this report at Appendix 4 and summarised in the body of this report, which must be taken into account before the decision whether to approve the proposed changes to the said scheme is taken.
- 9.5 In R (on the application of Moseley) v London Borough of Haringey [2014] UKSC 56, the Supreme Court considered the requirements of public consultation. It approved a list of four legal requirements relating to public consultation, which had previously been approved by the Court of Appeal in R v Brent London Borough Council ex parte Gunning (1985) 84 LGR 168—and therefore often referred to as the 'Gunning' or 'Sedley' requirements. These are that:
 - (i) consultation must be at a time when the authority's proposals are still at a formative stage;
 - (ii) the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response;
 - (iii) adequate time must be given for consideration and response; and
 - (iv) the product of consultation must be conscientiously taken into account in finalising any proposals.

In terms of point (iv), the decision maker must consider consultation responses with 'a receptive mind' (R v Camden London Borough Council ex parte Cran [1995] EWHC 13 (Admin)) and be prepared to change course if persuaded (R v London Borough of Barnet ex p B [1994] ELR 357). But there is no duty to adopt the views of consultees (R (Smith) v East Kent Hospital NHS Trust [2002] EWHC 2640 (Admin)).

- 9.6 Regulation 9(1) of the 1996 Regulations sets out when an authority must hold a public inquiry before making an order and when it has a discretion to hold one. Given that the proposals concern the making of an order under sections 45 and 46 of the 1984 Act, there is a discretion but no obligation in this case to hold an inquiry. Having considered the objections to the proposal, it would be lawful for the Council to decide not to hold a public inquiry having regard to among other matters the following: the scheme will contribute towards achieving a number of the Council's policy objectives and holding a public inquiry would lead to expense and delay while being unlikely to alter the ultimate decision. As required under section 122(1) of the 1984 Act, the factors which have pointed in favour of making the changes proposed to the essential permit scheme are set out in this report.
- 9.7 Approving the making of the changes proposed to the essential permit scheme is an executive decision that can be taken by the Cabinet in accordance with the Council's Constitution.

9.8 **Procurement**

Strategic Procurement note the contents of this report and confirm there are no procurement related matters preventing Cabinet from agreeing the Recommendations stated in Section 3 of this report.

Equalities

- 9.9 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.
- 9.10 The three parts of the Duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status apply to the first part of the Duty.
- 9.11 Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.
- 9.12 The review of the ESP scheme sought to ensure that those who need to access the scheme can do so. Foster carers will be allowed access to the scheme at the subsidies charge. It proposes team (transferable) permits for Council services but retains the vehicle specific and daily permit for those who need them. The main users of this scheme were consulted on options and those proposed will not negatively impact those with protected characteristics. Allowing foster carers to use

the scheme is likely to have a positive impact on groups which share the protected characteristic of 'age', as children are disproportionately likely to benefit from foster carers being able to carry out their duties more effectively.

- 9.13 The changes proposed for schools allows them greater flexibility over their parking arrangements. The cap on permit numbers that will be issued has been increased following consideration of objections, but still ensure that those changes do not result in a net increase in the number of vehicles parked in roads near schools.
- 9.14 Those changes also aim to ensure that sustainable transport options are always promoted and that conflict between ESP permit users and those residing in CPZs are minimised. Robust measures are therefore proposed to deal with any non-essential use or abuse of those permits.
- 9.15 The charge increase proposed is the first increase for several years. A surcharge will apply to diesel-fuelled vehicles, bringing this scheme in line with other parking permit charges. This is intended to promote the use of lower polluting cars, reducing air pollution and promoting health opportunities of all borough residents.

10. Use of Appendices/background documents

Appendix 1 – ESP Charges (current and proposed)
 Appendix 2 – School permit charges in other boroughs
 Appendix 3 – Notice of Proposal
 Appendix 4 – Objection report

11. Background Papers

- The review of the Essential Service Permit Scheme March 2023.
- Haringey Transport Strategy 2018-2028

Appendix 1: Charges

ESP charges (current and proposed)

CO ₂ emission band	Current charge	Proposed new charge	
(CO ₂ g/km)	(per annum)	(per annum)	
Up to 100	£165	£182	
101 - 110	£207	£228	
111 – 120	£248	£273	
121 – 130	£289	£318	
131 - 140	£331	£364	
141 - 150	£372	£409	+ £80 diesel
151 - 165	£517	£569	surcharge if
166 - 175	£558	£614	applicable
176 – 185	£599	£659	
186 - 200	£640	£704	
201-225	£682	£750]
226 - 255	£723	£795]
over 255	£764	£840	

Team (transferable) ESP

Current Charge (annual)	Proposed charge
	(annual)
£764	£851

Daily ESP

Current Charge	Proposed charge	
£11	£12	

Reduced (concessionary) charge ESP charges – Current and Proposed.

CO ₂ emission band	Current charge	Proposed new charge (aligned with residential parking charges).		
(CO ₂ g/km)	(per annum)	residential par	king charges).	
Up to 100	£21	£34.10		
101 -110	£31	£45.10		
111 – 120	£41	£56.10		
121 – 130	£62	£79.20		
131 -140	£83	£102.30		
141 -150	£103	£124.30	+ £80 diesel	
151 -165	£145	£170.50	surcharge, if	
166 -175	£165	£192.50	applicable	
176 – 185	£186	£215.60		
186- 200	£207	£238.70		
201-225	£227	£260.70		
226-255	£269	£306.90		
over 255	£289	£328.90		

Engine size

Not over 1540cc	£72	£90.20	+ £80 diesel
1550 cc to 3000cc	£186	£215.60	surcharge, if
3001cc and above	£289	£328.90	applicable

Proposed school (transferable) ESP charges

Number of permits issued to school	Proposed charge (per annum)
1 to 10 permits	£200 per permit
11 to 20 (maximum number) permits	£300 per permit

Appendix 2: Comparative charges for school permits in other boroughs

School permit allocation in other boroughs

Borough	Charge and conditions
Islington	£406 – Maximum 3. Cannot be used for commuting
Barnet	£209- School parking scheme – subject to availability of on-street parking.
Redbridge	£396- ESP for making visits - not for commuting
Waltham Forest	£210 to £720 – 3 charge bands based on vehicle CO2 emissions.
Lambeth	£435.44 – teaching staff only.
Brent	£424 – ESP for business use only. Cannot be used for workplace parking.
Barking and Dagenham	Sold daily or monthly - Annual equivalent $\pounds120$ (very low polluting cars) to $\pounds192$ + additional $\pounds72$ for diesel cars.
Revised Haringey Scheme	A maximum of 20 permits at £200 (annual). An additional 10 at £300. May be used for commuting. Permits transferable and may be shared.

- The revised charge at £200 would equate to £1 a day (based on 195 school days). With surcharge added (£300) this increases to £1.50 a day. This flat fee and transferable permit will allow schools the flexibility required for the smooth running of their school.

Appendix 3: Notice of Proposal

Public Notice

HARINGEY COUNCIL – PUBLIC NOTICE PROPOSED CHANGES TO ESSENTIAL SERVICE PERMIT The Haringey (Charged for Parking Places) (Amendment No. *) Order 202*

T20

- Notice is hereby given that the Council of the London Borough of Haringey proposes to make the above mentioned Orders under sections 45, 46, 49 and 124 of and Part IV of Schedule 9 to the Road Traffic Regulation Act 1984, as amended.
- The general effect of the Order: To make the following changes to the Essential Service Permit (ESP) to facilitate those who need to use a motor vehicle to deliver essential services to Haringey residents:
 - a) ESPs issued to Council staff will be transferrable
 - ESP charges will increase by inflation (10%) and a new £80 surcharge will be applied to diesel fuelled vehicles, see Schedule below.
 - c) Schools are to be removed from the reduced charge ESP scheme. An annual allocation of transferable school (ESP) permits, which can be allocated as and when required, will be made available to schools that are Ofsted-registered and have an up-to-date School Travel Plan. The permit will be limited in use to specific streets close to the school. It is proposed that an allocation of 10 ESPs is made available at a charge of £200 per permit annually. Those requiring a higher allocation will be limited in total to 20 per school. Each additional permit (above the standard 10 allocation) will attract a surcharge of £100 per annum.
 - d) Foster carers appointed by the Council to provide temporary custody or guardianship for children under the age of 15 years, whose parents are unable to look after them will be eligible to apply for an ESP at a reduced (concessionary) charge.
- 3. A copy of the proposed Orders, a copy of this notice and a copy of the Council's statement of reasons for making the proposed Orders can be viewed online <u>https://www.haringey.gov.uk/parking-roads-and-travel/roads-and-streets/traffic-management-orders/traffic-management-orders/traffic-management-orders-2023#proposed</u> Alternatively, an appointment can be made, by emailing <u>traffic.orders@haringey.gov.uk</u> to inspect these documents during normal office hours at the reception desk of Alexandra House, 10 Station Road, Wood Green, N22 7TR. Appointments to inspect the documents will be available until the end of a period of 6 weeks from the date on which the Orders are made or the Council decides not to make the Orders.
- 4. Any person wishing to object to the proposed Orders or make other representation should send grounds for their objection via email <u>traffic.orders@haringey.gov.uk</u> or write to Traffic Management Group, Alexandra House, 4th floor, 10 Station Road, Wood Green, N22 7TR quoting reference 2023-T20, by 12th July 2023.

Dated: 21st June 2023

Ann Cunningham Head of Highways & Parking

Appendix 4: Objection Report

Comments	From	Number
Whittington Health NHS Trust's Response to the Essential Service Parking Permit Consultation:	Whittington Health NHS Trust	1
Whilst moves to encourage the adoption of green travel modes are laudable, the proposed increases represent a cost increase to the Trust of between 10 and 58% on the Trust's current permit expenditure for its essential users of Haringey permits. This is a cost increase in excess of the inflation funding received by the Trust. This additional cost represents resource which could no longer be used by the Trust to provide patient care, should the increase proceed in the form currently proposed.	Tust	
Given the stated aim of the change, stated in Haringey's consultation as " to strike a balance that meets the needs of users while ensuring that associated impacts on busy roads is minimised", it is regrettable that the percentage increase as proposed is uniform across the range of CO2 emissions and that the Authority has not taken the opportunity to propose a greater increase to the most heavily polluting vehicles, whilst rewarding the least polluting with a lower charge.		
The addition of a flat-rate additional charge for diesel vehicles is in effect a regressive charge, impacting smaller-engined and less-polluting diesel vehicles disproportionately compared to the increase applying to larger-engined and more-polluting diesel vehicles.		
The proposal in its current form offers no incentive to essential users to switch to hybrid or electric vehicles.		
In line with the aim of encouraging greener modes of transport, it would be preferable for the charges to be realigned so as to offer an incentive for the adoption of less-polluting vehicles.		
Given the budgetary challenge that the proposed change presents to local health service providers, it would be helpful if a concession could be made for staff delivering essential health services within the Borough- such staff pay for their permits themselves and reclaim through Trust expenses.		
It would be appreciated if these points could be taken into consideration when the final decision is taken as to the proposed increase.		
I am writing to complain of the recent proposed changes to parking permits, on the surrounding roads, outside Lordship Lane Primary School.	Lordship Lane Primary School	2
From my understanding, schools are to be removed from the reduced charge ESP scheme. Also, permits will only be made available on allocation of 10 ESPs at a charge of £200 per permit annually (currently £103) and those that require a higher allocation will be limited, in total, to 20 per school. Each additional permit will be £300 per annum.	Assistant Headteacher	
I find these changes absolutely absurd and despotic. I have been teaching at the school for a number of years and have paid the already extortionate annual fee. There have never been any deductions to your charges, despite myself and my colleagues being public sector workers, who also worked tirelessly throughout the pandemic.		
Surely, you can not believe that teachers and teaching staff were only seen as essential workers through the pandemic; I beg to differ. Being a teacher or any part of the teaching profession is paramount to society and is always essential. I urge you to reconsider this drastic change in fee increase and amount of allocated spaces.		
I am writing to complain about the recent changes of the parking permits surrounding roads outside Lordship Lane Primary School. From the email that was sent to us regarding that Schools will be removed from reduced changes ESP scheme, however permits of £200 per permit and those required higher	Lordship Lane Primary School	3

Comments	From	Number
allocation will be limited I total to 20 per school. Each additional permit will be £300 per annum. These changes are absolutely disgraceful and absurd! I have worked for numerous of years and having to pay to park my car on the road as well paying insurance and road tax to keep my car on the road. Also I take folders home to get resources ready for the children and I need to put them in the car. On my behalf and my colleagues have worked relentlessly to keep the school open during difficult times (pandemic) to provide for the children education and keep our children safe who were vulnerable. We are essential workers.	Teaching Assistant	
We are essential workers. With these dramatic increase changes of the fees is appalling! I am writing to complain about the recent changes of the parking permits, surrounding the roads outside of Lordship Lane Primary School: Ellenborough Road and Granville Road. It has been brought to my attention that schools will be removed from the reduced charge ESP scheme, resulting to an excessive increase of parking permits annually. Not only do I already pay to go to work, in order to provide an education for our children in the community, but I also rely on driving as a form of transport to commute to work. I have been working at Lordship Lane Primary School for six years and I have never seen the roads busy nor do staff acquire much of the road space for parking. Therefore, it is unfair and beyond inconsiderate to us staff to now suffer and be charged beyond measures to park a vehicle. Not only is there plenty of parking in the surrounded roads, it is essential that us staff are permitted a parking permit - at a fair price - as we carry books to and from school for marking. The price that you wish to now charge us is not attainable and therefore will severely impact our ability to provide a high-quality education for our pupils. This is unjust! Additionally, changes to this scheme will greatly impact those who are unable to financially pay for a permit and therefore will have their work affected due to an increased travel time when commuting - resulting to poor performance at work. How would you feel to know that a child of yours is impacted from this? I myself, along with fellow colleagues of mine at Lordship Lane Primary School, have	Lordship Lane Primary School staff	4
worked relentlessly throughout difficult times; including the pandemic - all to educate and keep our children safe! I strongly object to this proposal. Many of my school staff, who live out of borough, need this flexibility of travel to balance their work and life commitments. Bruce Grove Primary School does not have a car park, therefore this policy change seems arbitrary and discriminatory in its nature. Furthermore, this measure would have a detrimental effect on retaining and recruiting staff. There is a cost of living crisis and many people are striking for more pay and this proposal would increase the financial burden on many school staff.	Bruce Grove Primary School Headteacher	5
 I do hope you will reconsider this proposal. I am writing to express my objection to the idea of sharing our parking permits with other team members. As someone who values the efficiency and convenience of having individual permits, I believe that sharing them would only complicate matters and create unnecessary difficulties for all of us. Allow me to outline a few reasons to support my objection: 1. Emergencies and Unforeseen Circumstances: We visit young people as part of our work, and these visits often occur at different times throughout the day. In situations where there is an emergency or urgent need to attend a visit, having a dedicated parking permit allows for quick and hassle-free access to parking. Sharing permits would make it challenging to co-ordinate our activities efficiently during these critical situations. 2. Unreliable Permit Availability: Sharing permits among six or seven people would increase the likelihood of permit unavailability when needed. Inevitably, there will be 	Haringey Young Adults Service staff Wood Green	6

Comments	From	Number
others without the necessary permit. Such uncertainty creates unnecessary stress and could disrupt our daily workflow.		
3. Increased Administrative Burden: Implementing a shared permit system would undoubtedly introduce administrative complexities. Co-ordinating the allocation, retrieval, and transfer of permits among team members would require additional time and effort. This time could be better spent focusing on our primary responsibilities and providing quality support to the young people we serve.		
4. Accountability and Responsibility: Individual permits promote a sense of accountability and responsibility. Each team member is responsible for managing their own permit, ensuring it is valid, and using it for authorised visits. Sharing permits could potentially diminish this sense of ownership, making it difficult to track permit usage and address any issues that arise.		
Considering these factors, I kindly request that our parking permits remain individualised to each team member. This arrangement has proven to be effective in ensuring efficient operations and maintaining flexibility for any unexpected circumstances that may arise.		
Thank you for taking the time to consider my objection. I genuinely believe that retaining individual parking permits will contribute to a smoother workflow and enable us to better fulfil our duties. If you have any further concerns or would like to discuss this matter, I am more than willing to have a conversation at your convenience.		
I currently work for the Young Adults Service and as such have a permit to enable visits to our care leavers. I understand that the view is to pool permits to make them available for the whole team, we tried that recently with Oyster cards and it did not work particularly because most worker work from home which delays the return of the card or takes them out of their way/takes up valuable time to come to the office to drop off a card or they cannot return it as they have several visit booked.	Haringey Young Adults Service staff	7
My recent experience, I received a call from a distressed care leaver who needed to get to the hospital, she has called an ambulance and they said minimum of 2 hours so she called me. I was able to get to her within 10 minutes and rush her to the hospital, once she was seem she was rushed down for an emergency surgery. If I did not have a permit, my car would not have been parked locally and it would not have been possible to get he to hospital for life saving surgery. We also often use our vehicles to move our care leavers and their belongings, we also on short notice have unaccompanied minors whom we will need to place at short notice often late in the evening.		
Our client group is very unpredictable and vulnerable therefore normally require immediate response, if we are going to be left without the means to carry out our support, this will impact our service users. I do not think pooling permits is a good idea and will not work for our service.		
I would like to object the proposal regarding the pool parking permits. My view is driven by the amount of inconvenience this will bring to social workers, especially those who needs to do statutory visits within the Borough. I believe day to day management of the permits will bring a lot of friction among team members.	Haringey Young Adults Service staff	8
I hope this letter finds you well. I am writing to express my deep concern and disappointment regarding the recent announcement of a significant increase in the price for the essential service permit. As a teacher in the area and someone directly impacted by this decision, I feel compelled to voice my discontent and shed light on the potential negative consequences it may bring to the community.	School staff	9
Firstly, I would like to draw your attention to the ongoing cost of living crisis that has affected countless individuals and families in our area. With the steady increase in prices for basic necessities, housing, and transportation, many are already struggling to make ends meet. The sudden and substantial rise in the essential service permit fees only exacerbates this burden and places an additional financial strain on people that care for and work in the community.		

Comments	From	Number
One particular concern I have is the removal of schools from the reduced concessionary charge. By doing so, you are not only putting an unfair financial burden on teachers who have chosen to work in this area, but also jeopardising the quality of education provided in our schools. Teachers who are unable to afford the increased expense of the permit may be forced to seek employment elsewhere, resulting in a significant loss of experienced and dedicated educators. This, in turn, hampers the educational development of our children and hinders the growth and progress of this community.		
Personally, as someone employed in the area, the rising price of the essential service permit presents a considerable challenge for me. Due to the increased cost, I would have no choice but to endure a lengthy daily commute of one and a half hours each way on public transportation. This situation is simply not viable, particularly considering the responsibilities I have as a parent with a young family of my own. Such an arrangement would undoubtedly have a negative impact on my well-being, work-life balance, and ability to actively contribute to the community.		
In light of the aforementioned concerns, I implore you to reconsider the decision to raise the price for the essential service permit. I understand that there may be financial considerations and constraints, but it is essential to take into account the long-term effects and the potential damage to our community's well-being and prosperity. It is my sincere hope that alternative solutions can be explored, such as gradual increases, subsidies, or finding additional revenue streams, to alleviate the burden on residents and maintain the appeal of our area for teachers and other essential service providers.		
I kindly request that you take my concerns and the concerns of many others into serious consideration. Our community's future, the well-being of its residents, and the quality of education for our children are at stake. I am confident that by working together, we can find a fair and sustainable solution that will benefit all parties involved.		
The email informing me about the proposed changes to the ESP emailed to me this week by the head teacher. All ESP holders should be sent this email, especially after reading that the cost for the permit will triple in my case. The head spoke to me in passing about the email and presumed that all the ESP holders in school had been sent one. ONLY the head had been sent this email.	Bruce Grove Primary School Teaching Staff	10
I have worked as a teacher for Haringey at Bruce Grove Primary for over 30 years. I have served this community for nearly all my teaching career. I have loved working in Bruce Grove and serving this community. I feel completely undervalued with this huge price hike. However, I can see that ministers ESP has not been affected by the new proposed changes. This is a discrimination against teachers. The general cost of living has rocketed, salaries for teachers have stayed the same, and the Council are now considering tripling the amount we pay! Teachers will be discouraged to work in this area and this will definitely have a negative impact on this community.		
Many of the teachers in our school live out of borough, I myself like to get to work at 7 in the morning by public transport this would take me 50 minutes from my home and half the time by car. As an early years teacher I always have lots to heavy resources to take to school. As you know are budgets are so stretched and therefore I have to rely on resources from a variety of sources which I pay for out of my own money and consequently I need my car to transport these to my work place. I also pick up another member of staff every morning. This price hike is totally unfair and unjust. I am hoping this does not progress any further, as teachers at Bruce Grove Primary (where there is no staff car park) we D0 "need to use a motor vehicle to deliver essential services to Haringey residents". For most of the teachers working at Bruce Grove, driving to work is a necessity and not a luxury.		
I would like you to reconsider the decision to raise the price for the essential service permit. I am shocked how the news of this proposal has affected the staff that have an ESP at my school. It is damaging to our emotional and mental wellbeing. Teachers are struggling to make ends meet and this is not helping the matter.		
I am writing to object to the proposed changes to the allocation of essential services permits to schools. I have included your email address, as well as the suggested address	Chestnuts Primary	11

Comments	From	Number
for lodging complaints, as I am a little suspicious of generic email addresses and the prospect of acknowledgement and response.	School Headteacher	
Firstly, it is hard for me to understand the proper rationale for these changes, as the document which is supposed to provide reasons does not provide any. It makes the standard rationale about reducing traffic while balancing the need for essential workers to use cars when needed, but does not clarify why school staff have made a particular exception.		
There is a recruitment crisis in schools. Any sort of limitations on current staff, or prospective staff, means Haringey schools have an additional unnecessary barrier in attracting and retaining good staff.		
In addition, the cost of living crisis means many of our staff are not in a position to absorb the burden of additional cost that the increase in prices will cause them. Removing the discount rate for school staff permits seems a particularly cruel twist given the wider landscape of increasing prices. This coupled with a funding crisis in schools means that pushing the responsibility onto schools to pay and claim money back from employees is nonsensical. How will this work		
in practice and why should it be the Headteachers responsibility to decide who can park? There are many local schools who will not be affected as they have on site car parking. However, for those schools with no such option this policy change seems discriminatory and unjust.		
and unjust.		
I am writing to object to the proposed changes to the allocation of essential services permits to schools. I write on behalf of myself and all of the staff who purchase essential service permits at West Green Primary School.	West Green Primary School Headteacher	12
Our first objection is that there seems to be no clear nor understandable rationale provided for these changes – the document given to outline the reasons, does not provide any clarification. Whilst it makes the standard rationale about reducing traffic while balancing the need for essential workers to use cars when needed, it does not clarify why school staff have been made a particular exception.		
Secondly, there is a well-publicised recruitment crisis in schools currently, in London in particular. Any sort of limitations on current staff, or prospective staff, means Haringey schools have an additional unnecessary barrier in attracting and retaining good staff. As some schools have on-site parking facilities, for those that do not, this policy change feels like an unfair disadvantage in the challenge of recruitment. As a school, we have already experienced prospective staff turning down positions offered due to the cost of parking (as we have no car park).		
Thirdly, the cost of living crisis means many of our staff are not in a position to absorb the burden of additional cost that the increase in prices will cause them. Given the wider landscape of increasing prices and the ongoing disputes and strikes regarding pay that reflects inflation, this seems to be an inappropriate time to be considering such a change. This cost burden may also leave staff with no choice but to strongly consider leaving West Green and seeking alternative employment closer to their homes, further adding to the recruitment and retention difficulties mentioned above.		
Finally, all of our current staff (and prospective staff) are essential workers providing an essential service. Those that use cars to attend work, do so because they have no alternative. Any limitations, either by cost or number of permits issued, will adversely affect the capacity of staff to carry out their essential roles. This may affect their wellbeing and impact on their family life (as they need to make changes to balance their household budgets). Furthermore, this will potentially impact the quality and continuity of staff we can attract and retain to deliver the best education to the children of West Green.		
I am writing to object to the proposals and consultation taking place that takes away the discounted permit to those of us who work in schools in Haringey, especially near Finsbury Park. I am about to work at a school near Finsbury Park, and I need to be able to drive. I	Staff	13

Comments	From	Number
may have to give up my job and choose a different school if the discounted permit is taken		
 away. I hope this letter finds you well. I am writing to express my deep concern and dissatisfaction regarding the recent decision to significantly increase the price of the essential service permit. As a member of the school community directly impacted by this change, I feel compelled to voice my grievances and shed light on the potential negative consequences it may have on our school and its teachers. First and foremost, I would like to draw your attention to the ongoing cost of living crisis that is affecting numerous individuals and families in our area. With the constant rise in prices for basic necessities, housing, and transportation, many of our teachers are already facing financial hardships. The sudden and substantial increase in the essential service permit fees only adds to their burden and places an additional strain on their livelihoods. This not only impacts their financial stability but also their overall well-being and ability to provide quality education to our students. 	Teaching staff	14
Moreover, I am deeply concerned about the removal of schools from the reduced concessionary charge. This decision puts an unfair financial burden on our teachers and compromises the quality of education we can offer. Teachers who cannot afford the heightened expense of the permit may be compelled to seek employment elsewhere, resulting in a significant loss of experienced and dedicated educators. The prospect of losing valued members of our teaching staff is deeply distressing, as it undermines the educational development of our students and jeopardises the overall academic environment of our school.		
It is disheartening to note that due to the substantial rise in the essential service permit price, teachers at our school are now considering leaving the area as a viable option. This situation not only affects the morale and job satisfaction of our teachers but also impacts the stability and continuity of education for our students. Additionally, the exorbitant expense of working in this area acts as a deterrent for attracting new teachers in the future, thus hindering the growth and progress of our school community.		
Considering the aforementioned concerns, I urge you to reconsider the decision to increase the price of the essential service permit. I understand that financial considerations and constraints may come into play, but it is crucial to recognise the long-term implications and the potential damage it may cause to our school community. I implore you to explore alternative solutions, such as implementing more reasonable fee increases, providing subsidies or grants for teachers, or identifying additional revenue streams, in order to alleviate the financial burden on our educators and preserve the quality of education our students deserve. I kindly request that you give serious consideration to my concerns and those shared by the teachers in our school community. The future of our school, the well-being of its teachers, and the academic development of our students are all at stake. I firmly believe that through open dialogue and collaborative efforts, we can find a fair and sustainable solution that benefits everyone involved.		
"I wish to object to some of the proposed changes to the ESP scheme. It is unrealistic for Haringey Council to expect residents and/or Council employees to change a personal infrastructure overnight! An infrastructure built around family, support networks, childcare and school, work, adequate and affordable housing and access to amenities and recreational facilities. Such arrangements are often planned and thought out to be maintained for a considerable length of time. For example, while you're saving to buy a house, or a bigger house, while you need parents/family to provide affordable childcare, while your children are in school, while you're training to improve your job prospects, while you are caring for elderly dependents.	Bruce Grove Primary School Staff	15
If the Council wants us to change our habits, they first need to improve their infrastructure; better and affordable housing, effective and reliable public transport, improved pay and conditions and improved job security, reliable and affordable childcare, sufficient and flexible wrap-around care via schools, consistent across every postcode. They need to make it attractive and worth making a major change in our circumstances so that residents		

Comments	From	Number
and employees would buy into the Council's ideals, because it offers an alternative that is as good if not better.		
Instead, the Council seems to have taken the approach of throwing its residents and employees in at the deep end and charging us extortionate amounts of money when we are unable to change our circumstances at the drop of a hat!		
I object to the proposed change to the cost of ESP for school staff by removing them from the list of people who are eligible for the concessionary price rate.		
I object to the blanket surcharge of £80 for all diesel vehicles.		
The proposal to remove school staff from the concessionary rate for ESPs is a decision that fails to consider the circumstances faced by staff in schools. While I understand the Council's objective of discouraging car usage and promoting sustainable means of transportation, it is crucial to recognise the challenges faced by school staff in their daily lives.		
 Distance of employees: a. Many school staff members do not live locally to the school due to various reasons, including affordable housing, personal circumstances, or family needs. b. Removing school staff from the reduced charge scheme disregards the fact that commuting to work is a common reality for many teachers and support staff and changing this is not an option. c. The introduction of Low Traffic Neighbourhoods (LTNs) in the area clearly does not prioritise the use of public transport. Consequently, relying solely on public transportation to get to and from work becomes impractical and inconvenient, especially considering the negative impact LTNs have had on bus schedules during 'Rush Hours'. d. School staff often face significant limitations when it comes to working from home or having flexible hours. Unlike certain professions that can adapt to remote work or via Zoom, school staff are generally required to be physically present at the school before and after the children arrive and leave. This lack of flexibility in work arrangements can pose challenges for individuals with personal responsibilities, such as dependents or other commitments. 		
 Recruitment and Retention Challenges: a. The education industry already faces significant difficulties in recruiting and retaining staff. Removing the reduced charge scheme for parking permits further diminishes the attractiveness of these positions. b. The lack of affordable parking options can deter potential candidates, limiting the pool of qualified individuals willing to work in schools. c. Retaining experienced staff members is equally vital for providing stable and quality education to students (residence of Haringey). Removing the reduced charge scheme may push current staff to seek employment opportunities elsewhere, exacerbating the existing retention challenges. 		
Limited and Shrinking Budgets: a. Schools often face constrained budgets, resulting in a shortage of resources and supplies for classrooms. b. Many dedicated school staff members regularly dip their hands into their own pockets to bridge the funding gap and provide essential resources so as to enable them to effectively deliver the curriculum to their students. c. Removing the reduced charge scheme for parking permits ignores the financial strain already placed on educators and support staff, forcing them to allocate even more of their own money towards providing their essential service. d. In addition to financial contributions, it is widely recognised that school staff, teachers and support staff alike, regularly devote countless hours of unpaid overtime to meet the		
demands of their roles. They often exceed the time allocated within their contracted hours, requiring them to work beyond their official schedules. This expectation to go above and beyond without proper compensation has become a common occurrence in the education sector.		

Comments	From	Number
 e. Along with financial contributions and unpaid overtime many staff members – predominantly support staff – are often asked to work above their pay scale to cover staff shortages without receiving any additional payment. f. Moreover, support staff are typically paid significantly less than teachers, despite their crucial roles in the school community. This policy fails to acknowledge the wage disparity and unfairly burdens support staff with additional expenses, adding to their overall financial challenges. 		
Providing an essential service to Haringey residents:		
According to the Department for Education (DfE) in the United Kingdom, as of 2021, the average percentage of pupils with identified SEN in English state-funded primary schools was approximately 15.3%. This figure includes pupils with statements of special educational needs or education, health and care (EHC) plans, as well as those without formal plans but with identified needs and support. Based on this average, in a class of 30 students, it would be expected that approximately 4-5 students would have some form of SEN. In Haringey this figure could be as high as 50% of a class. There should be no question that school staff provides an essential service to Haringey residents. Unlike certain professions where permits are provided for members of a team or the cost can be claimed back eg. for elected members , education staff often face challenges in obtaining permits and bearing the associated costs. Schools, which typically operate with limited budgets, may find it difficult to absorb this substantial expense. If the cost was to remain at the concessionary rate individuals would be more likely to be able to absorb the cost themselves without creating a significant financial burden.		
In Haringey, there are 100 schools, comprising 30 secondary and 70 primary schools. Assuming most secondary schools have a carpark and some primary schools do as well, let's estimate that around 50% of schools have parking facilities. There are 350 ESP holders, resulting in an average of 3.5 cars per school. For the estimated schools without a carpark, number of cars per school is 7. While these cars may contribute to local traffic, the impact on pollution and congestion is unlikely to be significant and it works out at just over one car per street, so the impact it would have on residence living on surrounding streets is negligible. The impact of the 'park and shop' bays which seemed to pop up all over the borough shortly before the LTNs were introduced would be of greater significance. These bays cannot be used by residence and leave space for 3 – 4 cars.		
Staff who work in schools are being discriminated against, especially those who work in schools without off street parking.		
My personal circumstances. I am an unpaid (and undervalued) carer for my elderly Mum who has dementia, is deaf and was massively deskilled while living in a shielding household during covid. With a lot of support from me she can live independently in her own home – she is effectively housebound without me. I am constantly on call should she need me. I need to be able to get to my Mum quickly in an emergency. I also need to get to her in a timely fashion should she need support attending an appointment – ideally missing the least amount of time off work as necessary (I have already explained how stretched staff is in schools). I need to have my car near by wherever I am in case I need to reach her quickly. She is a blue badge holder – so I would need to have my car to take her on any further journey.		
I would also like to know why the Council charges more for ESPs than it does for a residence permit for the same vehicle on the same road?		
£80 surcharge on diesel vehicles		
ULEZ Compliance: Diesel vehicles that meet the ULEZ standards have undergone modifications or have advanced emission control technologies to significantly reduce their emissions. ULEZ compliance indicates that these vehicles meet the required environmental standards and contribute less to air pollution and emissions compared to non-compliant diesel vehicles.		

Comments	From	Number
Punitive Measure: Implementing a blanket surcharge for all diesel vehicles, including those that are ULEZ compliant, can be seen as a punitive measure that fails to recognise and incentivise the positive efforts made by owners of compliant diesel vehicles. It undermines the purpose of ULEZ compliance and disincentivises individuals from adopting cleaner diesel technologies.		
Financial Impact: The surcharge imposes an additional financial burden on individuals who own diesel vehicles, irrespective of their compliance with ULEZ standards.		
Inconsistency in Policy: Penalising ULEZ-compliant diesel vehicles conflicts with the Mayor of London and TFL's own standards and policies. The ULEZ framework was designed to encourage the use of cleaner vehicles, and owners of compliant diesel vehicles have already made efforts to align with these standards. Imposing a blanket surcharge contradicts the underlying principle of rewarding compliance.		
I take issue with the way in which the information regarding the proposed changes to ESPs was shared.		
The meeting regarding the changes was held in February 2023 but the Council did not share the information until the end of June 2023. You shared the information on the same day that the consultation went live and you shared it at one of the busiest times of the school year. Additionally, you chose to share it only with head teachers rather than directly with all the permit holders.		
There is no doubt that implementing these proposed changes will have a detrimental impact on the quality of service provided to some of the borough's most vulnerable residents. Furthermore, it is likely to further deflate the morale of an already undervalued workforce within the education sector. The mental well-being of school staff is likely to be significantly affected by the additional financial burden and the lack of recognition for their dedication and hard work. It is crucial to consider the potential negative consequences on both the service received by vulnerable residents and the overall well-being of school staff when making decisions that directly impact their work and personal lives.		
In conclusion, there are several valid objections to the proposed changes to the Essential Services Permit (ESP) scheme. Haringey Council must consider the realistic challenges faced by employees before implementing such changes. It is essential to first improve infrastructure, including affordable housing, reliable public transport, and increased job security, before expecting individuals to change their circumstances. The proposed removal of school staff from the concessionary rate for ESPs and the blanket surcharge on diesel vehicles fail to acknowledge the unique circumstances and financial strain faced by individuals and schools. A more comprehensive and supportive approach is needed, one that takes into account the recruitment and retention challenges in the education sector, limited budgets, and the dedication of school staff who often go above and beyond to meet the needs of the children in their care. Balancing environmental considerations with the needs and well-being of school employees should be the focus, ensuring that any changes are fair, practical, and incentivise positive actions.		
I am writing to object to the proposed changes to the allocation of essential services permits to schools. I have included your email address, as well as the suggested address for lodging complaints, as I am a little suspicious of generic email addresses and the prospect of acknowledgement and response.	South Harringey School Headteacher	16
Firstly, it is hard for me to understand the proper rationale for these changes, as the document which is supposed to provide reasons does not provide any. It makes the standard rationale about reducing traffic while balancing the need for essential workers to use cars when needed, but does not clarify why school staff have made a particular exception.		
There is a recruitment crisis in schools. Any sort of limitations on current staff, or prospective staff, means Haringey schools have an additional unnecessary barrier in attracting and retaining good staff.		

Comments	From	Number
In addition, the costs of living crisis means many of our staff are not in a position to absorb the burden of additional cost that the increase in prices will cause them. Removing the discount rate for school staff permits seems a particularly cruel twist given the wider landscape of increasing prices.		
There are many local schools who were not be affected as they have on site car parking. However, for those schools with no such option this policy change seems discriminatory and unjust.		
The Educational Psychology Service is an essential service to Haringey. This is a peripatetic team who undertake statutory Local Authority and traded service duties. Their role as Educational Psychologists requires them to travel from place to place for relatively short periods of time during the day to undertake assessments, meet with staff and families and carry out training. They carry a lot of equipment and assessment materials to schools, colleges, children's centres, Childrens homes and family homes in order to complete their assessments contributing to their EHC Plan in line with statutory guidelines and deadlines. Each Educational Psychologist requires their own individual permit as each have their own list of schools and children allocated to them. Sharing a permit would not work for our service as each educational psychologist is undertaking their own individual large workload at the same time in different settings (at least 2/3 a day) across the whole borough of Haringey and travel from one location to another without going to the office for time efficiency. A shared permit would severely impact on the team's ability to fulfil their statutory duties.	Haringey Educational Psychology Service	17