

Report for: Cabinet Member signing

Title: Parking Strategy and Policy/Charges Review – feedback to statutory consultation

Report
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Ward(s) affected: All

Report for Key/

Non-Key Decision: Key decision

1. Describe the issue under consideration

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

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

2. Cabinet Member Introduction

- 2.1. Not applicable

3. Recommendations

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

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

4. Reasons for decision

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

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

5. Alternative options considered

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

6. Background information

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

¹ [Parking Strategy & Policy / Charges Review, Cabinet July 2024](#)

- Supporting a thriving, welcoming borough - focusing on supporting accessibility to cultural, recreational, and commercial areas, and to boost local economy and community engagement.
- Delivering a responsive, effective service for Haringey's people - commitment to proactive service delivery that anticipates and adapts to the needs of Haringey's people.
- Supporting residents with additional needs - prioritising accessible parking solutions for residents with mobility restrictions or other specific needs to foster an inclusive community environment.
- Creating fairness in road space use - strategically managing the allocation of road space to balance the needs of all users, promoting equitable access and minimising congestion, and improving the street environment.
- Delivering an innovative, sustainable parking service - implementing advanced, sustainable technologies and practices that lead to more efficient use of resources and better service outcomes.

6.4. Alongside the Parking Strategy, in July 2024, Cabinet also authorised officers to proceed to carry out statutory consultation on amending relevant traffic management orders to implement changes to policies and charges. These proposals seek to address the environmental impact of vehicles (considering factors like volume of vehicles and vehicle emissions, and vehicle size), and to incentivise more sustainable transport choices aligning with the commitment to address the climate emergency and deliver healthy streets and to accurately reflect the real-world impact of vehicle usage.

6.5. When setting or reviewing parking charges, the Council considers:

- Its transport and wider policy objectives
- Statutory or legal requirements that may affect the setting of fees
- Car ownership patterns
- The increasing demand for parking
- Traffic management issues
- Market conditions - for example, parking charges in other boroughs
- The cost of delivering the service
- Impact of charges on relevant stakeholders.

6.6. The Council has a duty under the Road Traffic Regulation Act 1984 section 122 to "secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway having regard to securing and maintaining access to premises, preserving or improving the amenities of the areas, national air quality, facilitating the passage of public service vehicles and safety and convenience of people using such vehicles as far as practicable." Officers consider that the following are of particular relevance, given the overarching objective of the Parking Strategy:

- Establishing charging principles promoting improved air quality through reduced emissions including a proposed electric vehicle charging tier,

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

- The provision of suitable and adequate parking facilities is advanced through business visitor permits.
- The introduction of pay and display charging for electric vehicles to encourage the turnover of parking spaces.

6.7. The measures that were proposed included the following (for which full details can be found in Appendix D of the July 2024 Cabinet report):

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

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

6.9. It was proposed that a new lowest charging tier be established for pure electric vehicles, with other emissions band vehicles moved up 1 charging tier.

New permit vehicle size surcharging for a range of permits

6.10. The current charging structure focuses on the impact of emissions, however recognising the impact of the size of vehicles – on the highway road space – should also be considered. This reflects wider corporate objectives to reassess and reprioritise highway space and seeks to drive more efficient use of this space.

6.11. It was proposed that a vehicle size surcharge be introduced, with medium length vehicles (4m-4.49m) being charged the prevailing base charge plus 5% surcharge; and large length vehicles (4.5m+) being charged the prevailing base charge plus 10% surcharge.

Incremental subsequent permit surcharging for a range of permits

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

Electric vehicle charging bays / parking in pay & display bays

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

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

Change of address administration charge

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

Rejected permit applications administration charge

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

Temporary cover (courtesy car)

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

Business visitor permits

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

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

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

Daily visitor permits

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

7. Statutory Consultation

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

8. Consultation results

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

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

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

- Concern about the impact of permit costs and/or the cost associated with the transition to an electric vehicle.
- Concern that EVs should not be given preference given they are larger / heavier

8.4. **Council response:** encouraging the transition to electric vehicles is a focus of a number of wider Council strategic objectives². This proposal supports this transition through having a distinct charge tier for fully electric vehicles – with this tier being lower than charge tiers for internal combustion engine vehicles. Currently, there is no distinct charge tier for fully electric vehicles, so there is less incentive to transition to these vehicles. As set out in Appendix D of the July Cabinet³ report, a number of other London Boroughs operate a permit charging structure which distinguishes fully electric vehicles from internal combustion engine vehicles, and this proposal further brings Haringey in line with this approach.

New permit vehicle size surcharging for a range of permits

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

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

³ [Parking Strategy and Policy/Charges Review](#)

⁴ [Parking Strategy 2024](#); [Walking & Cycling Action Plan 2022](#); [Climate Change Action Plan 2021](#); [Transport Strategy 2018](#)

⁵ Road Traffic Regulation Act 1984 section 122

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

Incremental subsequent permit surcharging for a range of permits

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

Electric vehicle charging bays/parking in pay & display bays

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

⁶ [Parking Permits and Charges – Ultra Low Emission Zone \(ULEZ\) Readiness](#)

⁷ [Transport Strategy 2018](#)

⁸ [Parking Strategy and Policy/Charges Review](#)

⁹ Road Traffic Regulation Act 1984 section 122

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

Change of address

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

Rejected permit applications

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

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

Temporary cover (courtesy car)

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

Business visitor permits

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

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

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

¹⁰ [Corporate Delivery Plan 2023/24](#)

- The proposed scheme may be open to abuse (used for parking other than for work purposes), or that sufficient parking was already available.

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

Daily visitor permits

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

- The proposal would negatively impact residents’ ability to have visitors – for example family / friends, those providing support or care, or trades conducting property maintenance.
- The administrative and financial burden of the proposal. The potential cost increases were cited as significant and would impact the respondents’ ongoing family life. Respondents were concerned that there was a greater administrative requirement to manage hourly visitor permits, for example, needing to add new permits should a visitor stay longer than anticipated.
- The proposal seeks to address potentially fraudulent use of daily visitor permits, but such activities should be addressed through other, more targeted means.
- There would be a disproportionate impact of the proposal across the borough, with CPZ enforcement hours varying from the west (typically shorter hours) to the east (typically longer hours). The proposal therefore has the potential for a differential impact across these CPZs.

8.28. **Council response:** The Council recognises the significant number of responses received concerning this proposal, as well as the nature and content of those responses which set out the potential impact of the proposed change to visitor permits. Through reviewing the consultation responses, the Council has an improved understanding of this potential impact, and how it may change the daily lives of residents across the borough.

8.29. Significant numbers of responses provide detailed information regarding the nature of the potential impact on daily family life and interactions with family and friends, in terms of cost and practicality, and the greater significance of the proposal in different CPZs.

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

Comments on consultation process / evidence

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

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

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

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

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

10. Carbon and Climate Change

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

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

Finance

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

Strategic Procurement

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

Assistant Director Legal & Governance

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

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

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

Equality

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

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

12. Use of Appendices

Appendix A – Statutory consultation report

Appendix B – Proposed parking permits and associated fees

Appendix C – Equality Impact Assessment

13. Background papers

[Parking Strategy and Policy/Charges Review – Cabinet 16th July 2024](#)