



Executive
19 September 2012

**Report from the Director of
Environment and Neighbourhood
Services**

Wards Affected:
ALL

Parking service simplification and pricing

1. SUMMARY

- 1.1. This report sets out options for simplification of a bewildering range of parking permits and the multiplicity of eligibility criteria. The proposed simplification will make it easier, quicker, and more convenient for customers to obtain parking permits and pay to park. Then the cost of processing applications will reduce and several loop-holes which allow drivers to park in unintended ways that undermine the Borough's parking objectives will be closed.
- 1.2. Options for adoption of new pricing principles and changes in charges are also recommended, in order to eliminate existing inconsistencies and to prevent any future price changes from unwittingly reintroducing unhelpful anomalies.
- 1.3. This report makes a wide range of recommendations to simplify arrangements for permit purchase, and propose fundamental changes to pricing, it should be noted that this report does not seek to consider or change any aspect of Borough traffic or parking policy, including the location, timing or operation of Controlled Parking Zones.

2. RECOMMENDATIONS

Simplification recommendations

Permit durations

- 2.1. That the Executive approve the implementation of a 24 month permit as set out in paragraph 3.7.
- 2.2. That the Executive approve the withdrawal of temporary courtesy permits in favour a new one month permit as set out in paragraph 3.46.
- 2.3. That the Executive approve the implementation of rolling permits as soon as technology allows as set out in paragraphs 3.7.

Permit redesign

- 2.4. That the Executive approve the withdrawal of liveried and non-liveried business permits in favour of a new business permit scheme as set out in paragraphs 3.10 - 12.
- 2.5. That the Executive approve the withdrawal of essential user permits in favour of a new online essential user day pass as set out in paragraph 3.14 – 3.15.
- 2.6. That the Executive approve introduction of online four hour visitor passes as set out in paragraph 3.27, together with the corresponding withdrawal of visitor permits as set out in paragraphs 3.24 – 3.25 and 3.43, and biennial expiry for re-authentication of Temple Visitor permits as set out in paragraph 3.26, together with the introduction of a new cared-for permit as set out in paragraph 3.32 – 3.33.
- 2.7. That the Executive approve the withdrawal of Wembley Stadium Protective Parking Scheme permits and replacement with permits identical except for biennial expiry for re-authentication as set out in paragraphs 3.41 - 3.42.
- 2.8. That the Executive approve revised permit refund arrangements as set out in paragraph 3.51.

Permit withdrawal

- 2.9. That the Executive approve a phased withdrawal of special permits as set out in paragraph 3.18 – 3.19.
- 2.10. That the Executive approve a withdrawal of replacement vehicle permits after virtual permits become universal, save that a maximum replacement period of one month is permitted where the vehicle is a higher emission than the original vehicle as set out in paragraph 3.47.

Suspensions

- 2.11. That the Executive approve the revised suspension arrangements as set out in paragraphs 3.53 - 3.54 and appendix C.

Pricing and payment recommendations

Principles

2.12. That the Executive approve the pricing principles as set out in paragraph 4.4.

Inflationary adjustments

2.13. That the Executive approve an inflationary adjustment of residential permit prices for 2012 on 1st December 2012 as set out in paragraph 4.6

2.14. That the Executive approve automatic annual RPI increases as set out in paragraph 4.7 effective from April 2013.

December 2012 price adjustments

2.15. That the Executive approve pricing for special permits as set out in paragraph 4.25 - 4.26 effective from 1st December 2012.

2.16. That the Executive approve pricing for temporary courtesy permits as set out in paragraph 4.33 effective from 1st December 2012.

2.17. That the Executive approve pricing for replacement vehicle permits as set out in paragraph 4.35 effective from 1st December 2012.

2.18. That the Executive approve pricing for existing business permits, pending replacement with a new business permitting scheme, as set out in paragraph 4.24 effective from 1st December 2012.

2.19. That the Executive approve pricing for essential user passes as set out in paragraph 4.26 and changes to existing permits as described in paragraph 4.28 with effective from 1st December 2012.

Pricing consistency adjustments

2.20. That the Executive approve revised pricing arrangements for residential permit duration pricing as set out in paragraph 4.10.

2.21. That the Executive approve revised pricing arrangements for additional vehicle for residential permits as set out in paragraph 4.11.

2.22. That the Executive approve pricing for dispensations as set out in paragraph 4.38 – 4.40.

2.23. That the Executive approve pricing for suspensions as set out in paragraph 4.42.

New permit type prices

- 2.24. That the Executive approve pricing for cared-for permits as set out in paragraph 4.16 – 4.17.
- 2.25. That the Executive approve pricing for online visitor passes as set out in paragraph 4.15.
- 2.26. That the Executive approve pricing for new business permits as set out in paragraph 4.19 – 4.23.

Biennial renewal administration charge

- 2.27. That the Executive approve a £15 administrative charge for biennial renewal of Wembley Event Day permits as set out in paragraph 4.29.
- 2.28. That the Executive approve a £15 administrative charge for biennial renewal of Temple zone visitor permits as set out in paragraph 4.31.

Payment method arrangements

- 2.29. That the Executive approve new pricing arrangements to encourage use application routes and payment methods that incur least cost to the Council at paragraph 4.12, 4.17, 4.23, 4.26, 4.30, 4.32, 4.34, 4.36, 4.39, 4.43 as explained in paragraph 4.12 – 4.13.
- 2.30. That the Executive approve cessation of cheques as a means of payment for parking services, with the exception of Penalty Charge Notices as set out in paragraphs 3.55.

3. DETAIL - SIMPLIFICATION

- 3.1. There are about 20 different permit types and variations in eligibility criteria across these products too.
- 3.2. This has arisen as a result of cumulative development of parking arrangements, with each new historical solution seeking to address a previously unforeseen parking issue. However, this add-on approach has resulted in a confusing range of options; many anomalies, and complexity in processing. This is a cause of high processing cost, inconsistency (which sometimes leads to customer complaint) and makes development of computer systems complex and costly.
- 3.3. The simplification proposals are in the context of the Borough's 10 transport Objectives¹, and specifically in the case of parking, objective 5 is:

¹ Brent Local Implementation Plan 2011 - 2014

“To introduce a Sustainable Parking Strategy, one which is fairer and more flexible, acknowledging the changing needs of local businesses in their daily operations, and includes a charging regime which recognises lower polluting vehicles. It will prioritise parking controls to support local residents and businesses over event traffic.”

3.4. Below are proposals to fundamentally simplify parking arrangements.

Residential permit length

3.5. Permit periods of 3, 6 or 12 months have the effect of requiring all 20,000 residential permit holders to reapply at least once a year.

Current permit lengths are:

12 month	83%
6 month	9%
3 month	8%

3.6. This arrangement inconveniences customers that have not moved or changed vehicle. Therefore it is proposed to move towards a rolling permit model that encourages customers to setup regular bank transfers - monthly or quarterly - and in return providing a virtual permit on an on-going basis until the customer cancels or has one of the above changes in circumstances.

3.7. The technology necessary for rolling permits this is not yet available. In the meantime the Executive is asked to approve:

- the introductions of a discounted 24 month permit to allow customers to further decrease the inconvenience of frequent renewal; and
- the introduction of rolling permits as soon as technology allows.

Business permit

3.8. Business permits are CPZ specific, and not emission-based. There are two types:

- (i) liveried permit (60 applications p.a.); and
- (ii) business or un-liveried permit (500 applications p.a.)

3.9. Liveried permits, are not offered by many authorities and involve a complex application process which includes the submission of vehicle photographs.

3.10. It is proposed that both existing schemes be withdrawn and replaced by a new single business permit which is priced according to whether the permit is vehicle specific or not.

- 3.11. It is proposed that the permits continue to be specific to the CPZ in which the business is based, but that the number of permits allowed is changed from three per business for the whole borough, to three per business for each CPZ in which they have premises. The scheme is proposed to take no account of any livery and whilst the authority retains an aspiration to move to an emission-based model for business permits, we are not yet in a position to do so.
- 3.12. It is proposed that a more flexible range of business permit durations are offered in the same way as proposed in paragraph 4.10 for residents' permits.

Essential User permit (ESU)

- 3.13. Under this scheme drivers that visit clients in the borough:
- to perform a statutory service on behalf of the Council;
 - to undertake health care whilst employed by the National Health Service; or
 - for a religious or non-profit making charitable organisation
- can apply for an all-zone permit at a cost of £125 per annum. The permits are vehicle specific and are not emission-based. To prevent workplace parking, permits are not valid within 500 metres of the holders stated workplace. About 1,130 permits are in circulation.
- 3.14. It is proposed that this permit be withdrawn and replaced with an online essential user day pass. The pass would continue to be valid in all zones and not be emission-based. Alike with cashless parking, an online account would be applied for together with details of the debit/credit or government procurement card from which payment will be taken. No cash payment option will be available. Approved staff would activate permits online or by telephone.
- 3.15. This proposal will make it easier for approved staff to use for different vehicles, and for infrequent essential use drivers to benefit from the scheme too. It would also be more difficult to fraudulently use ESU in lieu of purchasing a residential CPZ permit, for essential users that also live in a Brent CPZ.

Special permit

- 3.16. Under this scheme schools can obtain a capped number of annual permits for staff provided the school achieves Transport for London's school travel plan at Bronze standard. There is no requirement to improve beyond bronze and no reduction of provision to reflect the expected reduction of car use that is a key objective of travel planning. Additionally the teacher retention issues that were behind this scheme no longer apply.
- 3.17. In practice, just 12 schools benefit with 157 permits in circulation. The permits cost £75 each.

- 3.18. It is therefore proposed that this permit be withdrawn, and that no new permits be issued once required Traffic Management Orders are made.
- 3.19. However to incentivise travel plan improvements, it is proposed that if a school with existing special permits achieves TfL Silver Travel Plan Standard by October 2013, it will be allowed to renew two-thirds of the existing holding of special permits for a further 24 months. After this period, it is further proposed that these schools have a further option to renew one half of any remaining permits for a final additional 12 months should they achieve the Gold travel planning standard by October 2015.

Visitor permit types

- 3.20. There are three schemes that allow CPZ residents to host visitors.
- (i) The **visitor household permit** provides residents the opportunity to purchase a 3, 6 or 12 month permit, but which is not vehicle specific and applies to just the road in which the householder lives. Officers are not aware of any other authority that offers annual visitor permits. In 2011, 4,527 visitor household permits were sold.
 - (ii) Three CPZ's have unusually extended hours of operation. The (Swaminarayan) Temple zone (T) operates 24 hours a day, seven days a week. The Wembley Hill Road zone and Ealing Road zone operate 18:30-21:00 every day including bank holidays. To avoid disadvantaging residents and visitors that only need parking during extended hours, limited duration visitor permits are available for a one-off charge of £10.
 - (iii) A *daily visitor permit* in the form of **scratch-cards**. Cost is £1 per day for the first 100 days and £2 per day thereafter. About 660,000 are sold per annum.
- 3.21. The existing arrangements are vulnerable to abuse. For example a two car family could buy a standard permit for their low emissions vehicle and get round the higher permit cost for a second vehicle by buying and using a visitors' permit instead. The visitor household permit is cheaper than buying a standard residential permit in 13 out of the 21 price points available and in the worst case a resident could save up to £190 per vehicle per year through this loophole.
- 3.22. Scratch-cards are also easily transferred or sold to people who are not entitled to use them, for example recently a resident close to the Stadium who advertised their private driveway for parking on event days, was caught giving scratch-cards to stadium visitors when their private driveway was full.
- 3.23. Annual visitor permits are based on the emission level of the highest emitting vehicle permit that a resident has purchased, and on the total volume of permits that a resident has purchased. This price only works for households that have residential permits. The variation in charges and complexity of calculation also causes problems for customers and staff.

- 3.24. Therefore with the exception of visitor passes for the 24 hour Temple zone, it is proposed to withdraw all visitor permit types in favour of:
- online visitor passes, each with a new maximum time of four hours and valid throughout the CPZ (existing arrangements are inflexibly limited to just one road); and
 - a new cared-for resident permit to cater for residents that need daily carer visits, as described in paragraph 3.29 – 3.33.
- 3.25. It is proposed that both the new online visitor passes and visitor scratch-cards operate in parallel. It is proposed that sale of scratch-cards ceases soon after the online alternative is available and has been operating successfully (likely to be late October 2012 and that customers will be able to use remaining scratch-cards for a further 12 months. Subsequently it is proposed that any unused scratch-cards will be invalid and ineligible for refund or any other benefit in kind.
- 3.26. It is proposed that visitor permits for the Temple zone are withdrawn and replaced with similar permits with a two year term. This will allow occasional re-authentication and earlier deactivation for vehicles or owners whose circumstances have changed.

Online visitor passes

- 3.27. It is proposed that online visitor passes replace all existing visitor passes and cards described in paragraph 3.20 above. In order to tackle commuter parking abuse, it is proposed that the new passes be of four hours duration.
- 3.28. Customers would need to buy credits for the new online visitor passes in batches (similar to purchasing scratch-cards in books). The easiest way to do so is online. Once a customer has credits, they can book a visitor parking session either online or by sending a text message. Alike with existing visitor permits, it is proposed that online visitor passes be useable by any vehicle, although if adopted the new arrangement would require that vehicle registrations be declared and stored for future fraud analysis.

Cared-for permit

- 3.29. The proposed replacement of the annual visitor parking permit with a short stay online visitor pass will disproportionately impact CPZ residents that require the services of carers. Some residents require visits by a carer up to five times a day.
- 3.30. Brent has eligibility criteria for carer funding. There are four bands of need: critical, substantial, moderate and low. Only those in the critical or substantial need band are eligible.

3.31. Critical or substantial needs can be long term, e.g. terminal illnesses, mental health problems, physical disabilities, drug or alcohol related problems etc; or short-term, e.g. a young man who broke his leg and needed 3 weeks care or post-operative rehabilitation. In 2010/11, 164 people met the eligibility criteria, although analysis of the proportion that lives within a CPZ has not yet been undertaken.

3.32. It is therefore proposed to introduce a two new 'Cared-for' permit types:

- **Annual** – the eligibility criteria would be a pre-existing approval (currently critical or substantial) by Adult Social Care or Brent PCT, and with a future review date of 12 months;
- **Short-term** – the eligibility for which would be either:
 - a. pre-existing approval by Adult Social Care or Brent PCT, and with a future review date of less than 12 months; or
 - b. an application by the cared-for person or a person holding a power of attorney; and
 - c. No previous issue of a short-term cared-for permit in the past three years.

Short term permits can be for any number of full calendar months between one and six. In the case of permits validated through Framework-I, the permit length shall not be longer than the next review date.

As some valid short-term caring needs are difficult to validate, the proposal includes the ability to obtain a short-term permit without proof of need. Whilst the proposal enables certain genuine short term care needs, there is the potential for permits to be obtained inappropriately. To limit this risk, the proposal caps short-term permits to a maximum of six months and one permit every three years.

3.33. It is proposed that the cared-for permit is valid for the CPZ in which the cared-for person resides. These permit will be held by (and only issued to) the person in need of care.

Wembley Stadium Protective Parking Scheme (WSPPS)

3.34. The Wembley Stadium Protective Parking Scheme was created in 2007 and encompasses roads not subject to CPZ controls on non-event days, and other roads that are subject to CPZ controls on non-event days. There are six Wembley event day permit types are illustrated in the table below:

Permit type	Existing event day controls	
	CPZ controls routinely apply	No controls routinely apply
Residents	CPZ residents permit	Event day permit
Visitors	Scratch card	Event day visitor permit
Business	CPZ business permit	Event day business permit
Allotments	-	Event day allotment permit

Schools	Special permit	Event day school permit
Place of worship	-	Event day place of worship permit

- 3.35. All WSPPS permits are not vehicle specific and are exempted from emission-based charges and are subject to a one-off cost of £10 each. As of 2011, about 47,000 WSPPS permits have been issued, and this is increasing at the rate of 1,500 permits a year.
- 3.36. **Event day residents' permit** holders that have moved away are not required to surrender their pass. Thus it is not known how many were originally issued to householders that have since moved away but remain in use. In most cases, these permits will have been thrown away as they are no longer required. However, some are still inappropriately used. This is unsustainable and open to abuse. Residents of private roads in WSPPS are also entitled to permits.
- 3.37. **Event day business permits** are available to legitimate businesses in the WSPPS area. There are 56 passes specifically issued to support Royal Mail and a similar number to support Metropolitan Police operations in the area too.
- 3.38. **Event day school permit** is available to a capped number of staff at schools in roads within the WSPPS that are only subject to parking controls on Wembley event days. There are 166 permits in circulation.
- 3.39. **Event day place of worship permit** is available to some of the congregation at recognised places of worship in roads within the WSPPS that are only subject to parking controls on Wembley event days. It is not available to places of worship on roads that are subject to CPZ controls on non-event days. 171 such permits are in circulation.
- 3.40. **Event day allotment permit** is available to allotment holders at Brent allotments. There are 25 event day allotment permits in circulation, all for Kinch Grove, near Preston Hill.
- 3.41. It is proposed that the above event-day permits described in paragraphs 3.36 - 3.40 are withdrawn and replaced with similar permits with a two year term. In the case of Royal Mail or Metropolitan Police permits, it is proposed that these permits be withdrawn and that the new business criteria are adjusted to accommodate these essential local services. This will allow occasional re-authentication and earlier deactivation for vehicles or owners whose circumstances have changed.
- 3.42. It is proposed that the process of re-authenticating the permits described in paragraphs 3.36 - 3.40 will commence in autumn 2013 / winter 2014, with the objective of having completed the re-authentication process before the first event of the season in Spring 2014. All existing permits would cease to be valid from that point onwards.

Event day visitor permit

- 3.43. In line with the proposal to withdraw all other long-length visitor permits with short-stay visitor passes, it is proposed that Wembley event day visitor passes be withdrawn in favour of a new online visitor pass as described at paragraph 3.27 – 3.28. Residents of private roads in WSPPS are not entitled to visitor permits and this is not proposed to change.
- 3.44. In summary proposed Wembley event day arrangements are illustrated in the table below:

Permit type	Proposed event day controls	
	CPZ controls routinely apply	No controls routinely apply
Residents	CPZ residents permit	24 month event day permit
Visitors	Scratch cards	4 hour online visitor passes
Business	CPZ business permit	24 month event day business permit
Allotments	-	24 month event day allotment permit
Schools	-	24 month event day school permit
Place of worship	-	24 month event day place of worship permit

Proposed changes are shaded.

Temporary courtesy permit

- 3.45. These are issued with a month's duration at a cost of £10 pcm. There are 340 such applications per annum and they are not emissions based. Typically the circumstances are:
- (i) just moved into Brent and cannot authenticate their new address;
 - (ii) the short period between buying a new vehicle and selling the old one;
 - (iii) annual permit expired and moving out of Brent in less than three months.
- 3.46. It is proposed that the informal temporary courtesy permit be withdrawn and replaced with a new one month residential permit, which is emission-based. Existing temporary courtesy permits will continue to be valid until they expire.

Replacement vehicle permit

- 3.47. There is a £10 per month charge and this permit accounts for about 250 permits per annum. This is typically used by customers who have temporary use of a garage courtesy car.
- 3.48. It is proposed to retain this service until the introduction of virtual permits in July 2013, after which it is proposed that customers will be able to temporarily change their permitted vehicle online at no cost. In the case of a replacement vehicle with a higher emission rating, a maximum permit replacement of one calendar month is proposed.

Permit refunds

- 3.49. The longstanding arrangement for refunds as set out in Traffic Management Orders is as follows:
- only full months remaining are eligible for refund;
 - annual permits – maximum 4 months refund;
 - 6 month permits - maximum 2 months refund;
 - 3 month permits - maximum 1 months refund;
- 3.50. Following the introduction of emissions charging, the above longstanding arrangements were temporarily relaxed to avoid potential disadvantage to customers that took the opportunity to change to a lower emissions vehicle or that needed a refund between schemes the pre-existing non emission-based charge and new emission-based charges. This relaxation ceased in mid 2012.
- 3.51. Some modifications are proposed to arrangements as follows:
- Refunds are only permissible for residential, business, special and cared-for permits;
 - no refund is payable in respect of rolling permits, 1 or 3 month permits;
 - maximum refund period is one-third of the purchased permit length;
 - only full months remaining are eligible for refund;
 - refunds of permits with less than one-third of the purchased permit length remaining, will be subject to a £15 administrative fee.

Bay suspensions

- 3.52. Suspensions allow restricted parking spaces to be suspended where traffic flow would otherwise be restricted during road works or to accommodate traffic attending special events. Suspensions are also used to facilitate building works, filming, removals, funerals etc.
- 3.53. It is proposed that the scheme is substantially redesigned to:
- simplify administration and charging;
 - introduce charges for unauthorised use of parking bays; and
 - withdraw concessionary rates except Brent Council funded street scene maintenance.
- 3.54. The details of the proposed new arrangements are given at Appendix C.

Cheque payment

- 3.55. Cheques are increasingly costly to process, as they require a great deal of manual processing and occasionally bounce. They are not legal tender. It is therefore proposed that this method of payment be withdrawn for all parking service except payment of Penalty Charge Notices. It is not expected that this will cause any insurmountable access barrier to the discretionary services, as customers are able to cash cheques and pay in cash or other electronic means.

No changes proposed

- 3.56. No operational or administrative changes are proposed in respect of:
- **disabled bay permits** - these relate to about 25 people with a high degree of disability that require provision of a dedicated parking bay. This carries no fee;
 - **doctors' bay permits** - these allow 37 Doctors to park in a designated Doctors' bay and do not permit home visit parking; and
 - **car club bay permits** - these are free to encourage car clubs in line with Borough Transport Policy objectives.
 - **Places of worship and community centres** – with the exception of event-day place of worship permits (only premises that are not in a CPZ are eligible), no permitting or visitor provision is made for places of worship and community centres. Officer discretion has sometimes been used to allow ad-hoc and limited use of scratch-cards in response to representations about difficulties caused. However, this will not be possible in an automated arrangement. Therefore it is recommended that a policy review in respect of future parking provision for these premises commence.

4. DETAIL - PRICING

- 4.1. There are around 20 different permit types, with around 150 separate price points.
- 4.2. Below are proposals to change pricing of parking arrangements. Most of the proposals are progressive in nature, i.e. intended to simplify pricing, remove anomalies and inconsistencies, encourage use of administratively simpler processes, disincentivise misuse, and make inflationary increases gradual by moving away from infrequent, but big price changes.
- 4.3. In order to remove anomalies and inconsistencies, there are inevitably differences in price changes. However it should be noted that majority of recommended changes are not intended to raise additional revenue in real terms.

Principles

- 4.4. The recommended changes have been developed based on general principles. It is recommended that the below principles for parking pricing be adopted in order to guide future pricing.

No change should be made that undermines policy objectives, and subject to this overriding principle:

- (i) A preference for annual inflation-matching price changes, rather than longer periods of static pricing followed by substantial price change, unless the cost of implementing annual inflation is economically unviable;
 - (ii) Where different means of applying or paying for services result in significantly different costs for the Council, customer prices should reflect the different costs;
 - (iii) The general consumer assumption larger or longer purchases should result in a lower unit cost should apply where practicable;
 - (iv) Inconsistent pricing for comparable products should be avoided;
 - (v) Very large anomalies should be eliminated in a staged manner;
 - (vi) The cost of enforcement should, where possible, be met by the income from parking charges and permits, with receipts from contravention penalties being released for wider transport or environmental objectives.
- 4.5. In order to facilitate annual inflation adjustments without reintroducing inconsistencies, many product prices are proposed to be in proportion to the annual price of a band 4 (average) first vehicle for a residential pass.

Residential permit

- 4.6. An annual price rise was not implemented in April 2012. It is therefore proposed to apply the April 2012 RPI increase (3.5%) to permit prices from 1st December 2012.
- 4.7. Permit prices have remained unchanged since April 2011, and prior to this permit prices were unchanged for several years. It is proposed that prices are automatically adjusted on the 1st day of April each year, based on the most recent available RPI data published by the Office for National statistics, and rounded to the nearest pound. This will typically be the January RPI figure, which is published on the 20th of February of each year.
- 4.8. There are unintentionally differing total permit prices for some multi-vehicle households. For example a household with two vehicles one from the most polluting emissions band (band 7) and a second vehicle from the least polluting emissions band (band 1) pay a different total amount for both vehicles depending on which vehicle is their nominated first vehicle. In the above example the total cost of permits for both vehicles are different, namely £300 or £275.
- 4.9. Pricing for shorter duration permits:
- have similar multi vehicle anomalies;
 - do not reflect the true cost of processing a permit for the same vehicle several times a year;
 - do not fully adhere to the principle that buying a longer period permit should be reflected in a lower unit price.
- 4.10. It is therefore proposed to link the price of all residents' permit periods according to the below multiple of the cost of an annual permit:
- 24 month permit 195%
 - 12 month permit 100%
 - 6 month permit 60%
 - 3 month permit 40%
 - 1 month permit 20%
- 4.11. To avoid the anomaly described at 4.5 above, it is proposed that the price of permits for additional vehicles be a flat rate, as shown below for annual permits. The flat rate for permits of different durations would be based on the multipliers proposed in 4.7 above.
- second vehicle £40
 - third vehicle £80

This proposed change will have a variable impact on total price payable for households with more than one vehicle. With thousands of possible price and duration combinations there some combinations will be cheaper under the new proposals and will be some and others will be more costly. Of course a price neutral outcome for all combinations would leave the anomalies in place. However, modelling has identified that the above proposed £40/£80 supplement has a neutral revenue raising impact in terms of the value of combinations that cost more versus those that cost less.

- 4.12. To encourage customers to move to the lower cost / higher satisfaction channels, subject to availability of online application options it is proposed to increase the base price of all residential, business, special, cared-for, temporary, replacement, Temple zone visitor permits, Wembley Protective Parking Scheme permits, suspensions and dispensations by £50 and offer the following cumulative discounts:

Channel discount		⇔	Payment method	
Online	£25	PLUS	Debit card	£25
Telephone	£5 (£25 for cared-for permits)	⇔	Credit card	£20

For example:

Application	Online	Online	Telephone	Online	Telephone
Payment by	Debit card	Credit card	Debit card	Cash	Cash
Cumulative discount (£)	50	45	30	25	5

A £25 price rise and compensatory discount approach to pricing was implemented for the Council's pest control service about two years ago. This transformed a service that was very heavily reliant on cash and cheque payments received after the service had been provided, to a service that today has a pre-paid cash/cheque payment rate of 0.01%.

Thus the vast majority of parking customers are expected to benefit from the maximum discount by changing their approach to online debit card payments and this change is expected to have a neutral financial impact on customers, but help the Council to dramatically reduce the cost of processing.

The recommended approach is a base price rise and corresponding discount, rather than a supplement for different methods of processing and payment. This is because the recommended approach is legally safer and will not incur any additional VAT costs for the Council.

- 4.13. It is therefore proposed that the 1.25% supplement for credit card payment be withdrawn.

- 4.14. The effects of all the recommended changes to residential permit prices including the proposed RPI increase from December 2012 are illustrated in appendix D. The illustration does not include the proposed April 2013 inflation adjustment and is based on the vast majority of customers that are expected to apply online and pay by debit card.

Online visitor pass

- 4.15. The online visitor passes proposed in paragraph 3.27 - 3.28, are proposed to be non-refundable and priced at:

- £1 each for online purchases paid for by debit card;
- £1.20 each for online purchases paid for by credit card; or
- £2 each for online purchases paid by cash.

It is proposed that evening and weekend visitor passes for Wembley Hill, and Ealing Road zones be half the standard price (weekday prices in these zones will be at the standard price).

Cared-for permit

- 4.16. It is proposed that the cared-for permit proposed in paragraph 3.24 – 3.25 have a base price of:

- annual - in proportion to half the cost of a band 4 residential first vehicle permit rounded up to the nearest pound (*which would currently mean £50 for a cared-for permit or less than half the cost of the existing visitor household permit which currently fulfils this need*).
- short-term - in proportion to 15% the cost of a band 4 residential first vehicle permit rounded up to the nearest pound for each calendar month (*which would currently mean £8 pcm*).

- 4.17. It is proposed that the scheme for increasing the base price and offering cumulative discounts as described in paragraph 4.10 be adopted for cared for permits, except that a higher discount of £25 for telephone applications be applied to avoid disadvantaging this group of vulnerable customers

Business permits

- 4.18. Business permits are £180 p.a. for liveried permits and £300 otherwise. This is significantly cheaper than many of our neighbours for whom the average charge is about £500 p.a.

4.19. It is proposed that the price of the new unified business permit proposed in paragraph 3.10 – 3.12 be incrementally increased in proportion to the cost of a band 4 residential first vehicle permit, as follows:

- April 2013 400%
- April 2014 450%
- April 2015 500%

4.20. It is proposed that the new business-friendly option of a non-vehicle-specific business permit be subject to an additional supplement of 50%.

4.21. It is proposed that the price of all new business permits be calculated using the same multiple of the cost of an annual permit as described in paragraph 4.5.

4.22. It is proposed that a wider range of business permit durations are offered in the same way as proposed in paragraph 4.9 for residential permits.

4.23. It is proposed that the scheme for increasing the base price and offering cumulative discounts as described in paragraph 4.10 be adopted for business permits.

4.24. Pending the introduction of new business permits, it is proposed to increase the price to £250 for liveried permits and £350 otherwise, effective 1st December 2012.

Special permits

4.25. It is proposed that the price of a special permit, which has been £75 for several years, be incrementally increased in proportion to the cost of a band 4 residential first vehicle permit, as follows:

- November 2012 100%
- April 2013 150%
- April 2014 200%
- April 2015 250%

4.26. It is proposed that the scheme for increasing the base price and offering cumulative discounts as described in paragraph 4.10 be adopted for special permits.

Essential users

4.27. It is proposed that the price of proposed daily essential user passes are as follows:

- £2 for online purchases paid for by debit card;
- £2.20 each for online purchases paid for by credit card.

No cash or cheque payments will be accepted.

- 4.28. In the interim until the new arrangements are implemented, it is proposed that the price of essential user permits be increased from £125 to £130 p.a. effective from 1st December 2012.

Wembley event day permit

- 4.29. It is proposed that a £15 administrative charge be levied for reissue and each biennial renewal. £15 is the average permit processing administrative charge levied by London Boroughs.
- 4.30. It is proposed that the scheme for increasing the base price and offering cumulative discounts as described in paragraph 4.10 be adopted for special permits.

Temple zone visitor permit

- 4.31. It is proposed that a £15 administrative charge be levied for reissues and each biennial renewal. £15 is the average permit processing administrative charge levied by London Boroughs.
- 4.32. It is proposed that the scheme for increasing the base price and offering cumulative discounts as described in paragraph 4.10 be adopted for special permits.

Temporary courtesy permit

- 4.33. This has been £10 for several years. Pending withdrawal of this permit in favour of an emission-based one month permit, it is proposed to increase the price to £15 effective 1st December 2012.
- 4.34. It is proposed that the scheme for increasing the base price and offering cumulative discounts as described in paragraph 4.10 be adopted for special permits.

Replacement vehicle permit

- 4.35. This has been £10 for several years. Pending withdrawal of this permit following introduction of virtual permitting, it is proposed to increase the price to £15 effective 1st December 2012.
- 4.36. It is proposed that the scheme for increasing the base price and offering cumulative discounts as described in paragraph 4.10 be adopted for special permits.

Dispensation

- 4.37. This is for the temporary relaxation of ordinary parking control such as yellow lines for the temporary exclusive use of an individual or organisation, for example during building works. The charge is £15 per vehicle per day, and has been unchanged for many years.

- 4.38. It is proposed that the charge is payable in advance and increased to £25 per vehicle per day effective from 1st December 2012, and that an additional urgent processing fee of £20 be introduced for applications with less than three working days notice (excluding Saturday, Sunday and Bank Holidays).
- 4.39. It is proposed that the scheme for increasing the base price and offering cumulative discounts as described in paragraph 4.10 be adopted for dispensations too.

Suspensions

- 4.40. This is for the removal from general use of one or more parking bays for the temporary exclusive use of an individual or organisation, for example during premises removals. The charge compensates for the loss of income, the cost of making the temporary change, and a higher fee to reflect the undesirable nature of withdrawing the bay from being for the benefit of all the community.
- 4.41. The current charge of £15 per bay per day, plus a £10 administration fee, is considerably lower than that for most other authorities and this is further exacerbated by a variety of concessions, or in some cases no charges at all, for certain utilities.
- 4.42. It is proposed that the changes become payable in advance, in full, and are also changed as follows:

Charge	Unit	Description
£40	per bay, per day	Standard suspension bay rate
£80		Administrative fee for cancellations, early reinstatement and short-notice suspensions
£200	per vehicle	Short-notice suspension, vehicle relocation
£200		Unauthorised bay item return fee , payable in addition to any storage fee
£40	Per day (or part day)	Unauthorised bay item storage fee , payable in addition to any return fee
£800		Unauthorised bay item disposal fee
No charge		Suspension for Brent Council funded street scene maintenance

- 4.43. It is proposed that the scheme for increasing the base price and offering cumulative discounts as described in paragraph 4.10 be adopted for suspensions too.

5. TIMING

- 5.1. Delivery of the recommendations proposed out in this report will require a great deal of complex and inter-related steps involving the changing of computer systems, processing arrangements, customer behaviours and financial transactions. It will also take place during a period when we are preparing for a retendering that could possibly involve a change in contractor, and definitely a change in how the Council requires our parking contractor(s) to operate.
- 5.2. There are some unmoveable milestones: the ending of the existing contract on 3 July 2013; the relocation of some parking services to the Civic Centre in spring 2013; and the expiry of parking shop building leases.
- 5.3. There are some key dependencies such as the delivery of new or revised IT systems and also some operational pressure points, such as the Christmas shut down of some 3rd party suppliers, the Stadium operating season and the school academic year. It is also extremely important that there are no service interruptions as even one days loss of service would cost tens of thousands of pounds.
- 5.4. There are also some very strict legal obligations. The main one is the requirement that any change to parking or traffic controls, prices or arrangements are subject to a statutorily defined change process. There are two routes:
- Traffic order: this typically takes 4 – 9 months and involves a mandatory informal consultation, draft order publication, objection consideration, final order making² and publication by public notice; or
 - Traffic Notice: this typically takes 4 – 6 weeks and is typically reserved for minor changes in detail, such as an inflation price increase.
- 5.5. It is not possible to definitively indicate when each change will be made. However, the likely indicative implementation periods are listed below:

Indicative implementation period	Proposed change
1 month	Suspensions
2 months	<ul style="list-style-type: none"> • Permit base price increase / discount • Flat rate 2nd / 3rd permit price supplement • Permit length price multiplier • Business permit price multiplier • Inflation price adjustment
9 – 15 months	<ul style="list-style-type: none"> • Introduce 1 & 24 month permit • Introduce cared-for permit • Withdraw visitor household permit • Withdraw special permit • Mainstream virtual permitting • WSPPS permits re-authentication

² Delegated to Head of Transportation.

	<ul style="list-style-type: none"> • WSPPS visitor permit replacement • Business permit replacement • Essential User pass changes • Revised refund arrangements
9 – 18 months	<ul style="list-style-type: none"> • Rolling permits

6. LEGAL IMPLICATIONS

6.1. The Council is empowered by the Road Traffic Regulation Act 1984 (as amended) and the Road Traffic Act 1991 to provide parking places on and off the highway and to charge for their use. The proposals would be introduced by the promotion of a Traffic Regulation Order under the Road Traffic Regulation Act 1984.

7. FINANCIAL IMPLICATIONS

7.1. This report seeks to make changes in support of the OneCouncil Parking Project (OCP). The OCP expects to make financial savings through several work-streams including: future savings from retendering the parking contract, closing the parking shops, improving the collection rate for Penalty Charge Notices and reducing back-office costs through automation. This report - simplification - is just one work-stream. Collectively all OCP work-streams aim to make the following financial betterments:

- 2012/13: £277k; and
- 2013/14: £300k.

7.2. The financial forecasts of the impact of the above proposals are complex and very dependent on second-guessing how driver and customer behaviour will change. However they include some assumptions:

- No change in volumes;
- No new IT costs in 2012/13;
- No overhanging leases to service;
- No capital cost requirement; and
- No redundancy costs.

- 7.3. Estimated changes to income as a consequence of the recommended changes in this report are set out below. It should be noted that some recommended price-changes can only be implemented at the end of a lengthy legal process and thus cannot be taken into account in 2012/13.

Permit price change	2012/13 (£000's)	2013/14 (£000's)
Residential permit inflation	16	50
Residential permit duration pricing	2	10
Business permit	6	70
Special permits	0.5	(5)
Essential users	1	-
Visitor passes / Cared for permit	neutral	neutral
WSPPS	-	-
Suspension	-	10
Dispensation	2	25
Temporary permits	0.3	-
Replacement permits	0.3	-
Total	28	160

- 7.4. The key change to expenditure arises from the interaction of these changes with the closure of the parking shop, which includes a back-office arrangement that undertakes permit processing. A 33k p.c.m. reduction in expenditure will arise from the closing of both parking shops (Oct 2012 – Feb 2013). However this is offset by likely additional £5k p.c.m. costs in telephone handling. Giving an estimated net saving of £28k p.c.m. During the period between the parking shop closure and the introduction of virtual permits at the start of the new contract, there will be an additional monthly cost estimated £8k for printing and posting of paper permits.

- 7.5. Assuming a worst case scenario of parking shop closure in Feb 2013, this gives savings of:

Month	Net efficiency
Mar 2013	20
April 2013	20
May 2013	20
June 2013	20

From July 2013, we will have a new parking contractual arrangement in place and the tendered prices for this are not yet know. However, it seems highly likely that these sorts of efficiencies are likely to be reflected in the new contract price.

- 7.6. The costs involved in the proposed introduction of rolling permits are not yet known. However it is likely that IT development will be delivered through the forthcoming new parking contract. The use of rolling permits is likely to further reduce authentication and transaction costs.

7.7. Changes to permit arrangements require Traffic Management Orders to be substantially changed. It is likely that the best approach will be their wholesale rewriting and reissue. This presents an opportunity to: write TMOs in a more modular way which makes future change easier; and to digitise all TMOs. However, this is an undertaking that goes beyond our in-house TMO capacity and specialist support will be needed at a likely cost of £40k in 2012/13.

8. DIVERSITY AND EQUALITIES IMPLICATIONS

8.1. The public sector duty is set out at Section 149 of the Equality Act 2010. It requires the Council, when exercising its functions, to have due regard to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, and to advance equality of opportunity and foster good relations between those who share a protected characteristic and those who do not share that protected characteristic.

8.2. A protected characteristic is defined in the Act as:

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race;(including ethnic or national origins, colour or nationality)
- religion or belief;
- sex;
- sexual orientation.

8.3. Marriage and civil partnership are also a protected characteristic for the purposes of the duty to eliminate discrimination. The previous public sector equalities duties only covered race, disability and gender.

8.4. Having due regard to the need to advance equality of opportunity between those who share a protected characteristic and those who do not includes having due regard to the need to remove or minimise disadvantages suffered by them. Due regard must also be had to the need to take steps to meet the needs of such persons where those needs are different from persons who do not have that characteristic, and encourage those who have a protected characteristic to participate in public life.

8.5. The steps involved in meeting the needs of disabled persons include steps to take account of the persons' disabilities.

8.6. The Council's duty under Section 149 of the Act is to have 'due regard' to the matters set out in relation to equalities when considering and making decisions. Accordingly due regard to the need to eliminate discrimination, advance equality, and foster good relations must form an integral part of the decision making process. Members must consider the effect that implementing a particular policy will have in relation to equality before making a decision.

- 8.7. There is no prescribed manner in which the equality duty must be exercised. However, the council must have an adequate evidence base for its decision making. This can be achieved by gathering details and statistics on who use the service and how the service is used. The potential equality impact of the proposed changes has been assessed, and that assessment is found at Appendix A.
- 8.8. Data on protected characteristics in direct connection with car usage is limited and therefore use is made of wider datasets. The attached EIA identifies that many of the proposals do not requires equalities assessment, including: inflation adjustments, essential users permits, suspensions and dispensations and business permits because they are universal in impact or impact solely on businesses rather than individuals.
- 8.9. Whilst the attached EIA assessment identifies that there is likely to be a differential impact on the grounds of race, disability and age, the proposal includes measures to mitigate the impact as described in section 6 of the EIA, including:
- Telephone access and public internet access at Brent libraries and local internet cafes for users with no internet access at home or on a smart phone;
 - W3C website compliance and telephone access for disabled internet users;
 - appointment-based one to one support in Council parking office, for customers with very low computer literacy or particular disability;
 - cash payment option for drivers with no bank account;
 - a new cared-for permit, that is priced lower than the existing arrangement, for residents that have a high number of otherwise costly parking requirements for their carer(s)
 - development of a shorter permit durations that accommodate the need for lower priced and short duration payment;
 - development of longer permit duration with better value-for-money payment arrangements;
 - new arrangement to facilitate cash payments at a number of local retailers to replace the existing arrangement for cash at just two Council premises;
 - gradual and phased implementation of changes;
 - a communications campaign to increase understanding of changes and mitigations available; and
 - retention of existing arrangements for no cost disabled permits.
- 8.10 After the extensive mitigation measures described above have been considered, there may be some remaining impact. However, this is likely to be negligible given that it is increasingly difficult to legally buy a car, obtain annual

insurance, obtain a driving licence, obtain car tax etc, without a bank account or electronic means of payment or with language difficulties. The council is entitled to consider countervailing factors when deciding what further steps could be taken to further mitigate any impact, or in deciding whether to proceed with the proposals, such factors include the budgetary and practical constraints upon the Council. In the circumstances members are advised that it is reasonable to proceed as proposed.

9. STAFFING IMPLICATIONS

9.1. The changes are expected to reduce the extent of some work streams for the in-house parking client team, for example time spent processing refunds and Essential User permits. However, the increasing number of FPN representations that cannot be out-sourced (CCTV issuance) is having a much greater impact on resources. Any efficiency will therefore be redirected into processing CCTV representations.

10. PROPERTY IMPLICATIONS

10.1. There are no property implications.

Background Papers

- 23 April 2012 Executive report proposing closure of parking shops³

Contact officers


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³ <http://democracy.brent.gov.uk/mglIssueHistoryHome.aspx?IId=7054&Opt=0>

Appendix A – Equalities Impact Assessment

Department: Environment and Neighbourhood	Person Responsible: Christopher Taylor
Service Area: Safer Streets	Timescale for Equality Impact Assessment :
Date: 20 July 2012	Completion date:
Name of service/policy/procedure/project etc: One Council: Parking Project	Is the service/policy/procedure/project etc: New <input checked="" type="checkbox"/> Old <input type="checkbox"/>
Predictive <input checked="" type="checkbox"/> Retrospective <input type="checkbox"/>	Adverse impact <input type="checkbox"/> Not found <input checked="" type="checkbox"/> Found <input type="checkbox"/> Service/policy/procedure/project etc, amended to stop or reduce adverse impact Yes <input type="checkbox"/> No <input type="checkbox"/>
Is there likely to be a differential impact on any group? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Please state below:
1. Grounds of race: Ethnicity, nationality or national origin e.g. people of different ethnic backgrounds including Gypsies and Travellers and Refugees/ Asylum Seekers Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	2. Grounds of gender: Sex, marital status, transgendered people and people with caring responsibilities Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
3. Grounds of disability: Physical or sensory impairment, mental disability or learning disability Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	4. Grounds of faith or belief: Religion/faith including people who do not have a religion Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
• Grounds of sexual orientation: Lesbian, Gay and bisexual Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	• Grounds of age: Older people, children and young People Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Consultation conducted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Person responsible for arranging the review: David Thrale	Person responsible for publishing results of Equality Impact Assessment: David Thrale
Person responsible for monitoring: David Thrale	Date results due to be published and where: Executive report 19 September 2012
Signed: 	Date: 28 August 2012

Please note that you must complete this form if you are undertaking a formal Impact Needs/Requirement Assessment. You may also wish to use this form for guidance to undertake an initial assessment, please indicate.

1. What is the service/policy/procedure/project etc to be assessed?

Parking– Simplification, pricing and access arrangements for parking permits and similar parking services

2. Briefly describe the aim of the service/policy etc? What needs or duties is it designed to meet? How does it differ from any existing services/ policies etc in this area

Introduction

A revision of the pricing scheme for parking permits forms part of a wider Parking Project aimed at changing the way we deliver our Parking Service.

There are about 20 different permit types, with most being available on a three, six or 12 month basis. With the introduction of emissions based pricing for resident permits, there are now around 150 separate price points for permits. There are also variations in eligibility criteria across these products too.

The current permit pricing system is unnecessarily complex and the Parking Service has adopted principles to fundamentally simplify local parking options (paragraph 4.4 of the Executive Report). A new pricing scheme for the following permits is proposed, to ensure that the service reflects these adopted principles:

Residential permits (paragraphs 4.6 - 4.14 of the Executive Report)

Visitor pass (paragraph 4.15 of the Executive Report)

Cared-for permits (paragraphs 4.16 – 4.17 of the Executive Report)

Business permits (paragraphs 4.18 – 4.24 of the Executive Report)

Special permits (paragraphs 4.25 – 4.26 of the Executive Report)

Essential users (paragraph 4.27 – 4.28 of the Executive Report)

Wembley Event Day permits (paragraph 4.29 -4.30 of the Executive Report)

Temple zone visitor permit (paragraph 4.31 – 4.32 of the Executive Report)

Temporary courtesy permit (paragraph 4.35 – 4.36 of the Executive Report)

Replacement vehicle permit (paragraph 4.33 – 4.34 of the Executive Report)

Dispensations (paragraphs 4.37 – 4.39 of the Executive Report)

Suspensions (paragraphs 4.40 – 4.43 & appendix c of the Executive Report)

3. Are the aims consistent with the council's Comprehensive Equality Policy?

This project is consistent with the Council's aim to ensure that the services provided are relevant to the needs of the community. The EIA is carried out to support good decision-making and to understand how different people will be affected by the revision of the parking permit pricing scheme.

The project is consistent with the aim of the council's Equality Policy to ensure that: "services must be relevant, responsive and sensitive and that the council must be perceived as fair and equitable in its provision of services".

Later on in this EIA we will attempt to identify any of eight "protected characteristic" groups that might be affected by the revision of the parking permit pricing scheme.

4. Is there any evidence to suggest that this could affect some groups of people? Is there an adverse impact around race/gender/disability/faith/sexual orientation/health etc? What are the reasons for this adverse impact?

This Equality Assessment has been undertaken to determine the impact of revising the parking permit prices on Brent residents who purchase parking permits. This generally includes residents who own cars and live in Controlled Parking Zones (CPZs), and residents in CPZs who require visitor's parking permits.

This assessment has considered the 8 protected characteristics covered by the Public Sector Equality Duty as well as those considered to be economically poorer, as a revision of permit pricing may have a significant impact on those who fall within this group.

Age

Analysis shows that 23.16% of the population within the CPZs, are over 60 years old. This is less than the national average of 32.80%. However, it is estimated that 5663 people over the age of 60 are non-internet users (4.58% of the total population within the CPZs) and may therefore be affected by changes that will result in non-internet based permit applications costing more. The Mosaic Interactive Guide also shows that these mosaic types generally have a low likelihood to self-service.

Elderly residents on pensions may have tight budgets and prefer to buy shorter length permits as they can't afford the outlay for an annual permit. These residents will be affected by the change that will result in shorter length permits attracting a higher proportionate charge.

The data for those mosaic types which have the highest proportion of elderly households (> 25%) was analysed to determine what percentage do not have access to a direct payment bank account for online or telephone payments. All of these mosaic types (except type 41) are below the national average (5.61%) for households without bank accounts. However it is not possible to determine what percentage of those without bank accounts fall into the >60years age group.

What is also not clear is the number of elderly residents who own cars and require permits. It is not unreasonable to assume that a large proportion of pensioners in Brent prefer to make use of public transport and their free bus passes. These particular residents will however be impacted by the changes for buying Visitor Parking Permits.

The introduction of the new visitor pass scheme (paragraph 3.27 of the Executive Report) will disproportionately impact elderly CPZ residents that require the services of carers. Some elderly residents require up to five carer visits per day. As such, the Cared-for permit (paragraphs 3.29 – 3.33, and 4.16 – 4.17 of the Executive Report) is proposed, to mitigate this impact.

Although it is difficult to fully determine the extent of the impact of the permit pricing changes, it is fair to say that it will have an impact on some elderly residents, although this is mitigated by proposals that the Cared-for permit be priced significantly lower than the existing arrangement for carer parking (paragraph 4.16 – 4.17 of the Executive Report)..

Disability

Analysis of the data shows that there are 1021 people claiming disability benefits within the CPZ areas. Disabled parking permits (or Blue Badges) are issued by Social Services and do not form part of these proposed permit price changes.

Disabled residents in CPZs will however have to purchase Visitor Parking Permits. These are available to purchase online at the standard rate (£1 for 4 hours), and at twice the standard rate if bought using cash. Disabled residents with visual impairment may not find the internet fully accessible while those with a physical impairment may find it difficult to use a mouse to navigate the web. Residents with learning difficulties may also struggle to complete service requests via the internet. Residents, who are deaf, have speech impediments or learning difficulties may not be able to

complete transactions on the phone.

The introduction of the new visitor pass scheme (paragraph 4.15 of the Executive Report) will disproportionately impact disabled CPZ residents that require the services of carers. Some disabled residents require up to 5 carer visits per day. As such, the Cared-for permit (paragraphs 3.29 – 3.33, and 4.16 – 4.17 of the Executive Report) is proposed, to mitigate this impact.

Gender reassignment

No impact identified.

Pregnancy and maternity

No impact identified.

Race

According to the analysis of the Mosaic data, there are 23,459 households within the CPZs of non-British backgrounds. This equates to 43.5% of the households within the CPZs. Some Mosaic types such as type 42, have as much as 94.5% of residents from non-British backgrounds. This is likely to have an impact on the residents' ability to speak English and will therefore impact on their ability to pay for permits online and by phone.

The seven mosaic types within the CPZs with greater than 50% of households with a non-British background are 20, 40, 42, 62, 63, 64 and 65. According to the data, 28.1% are non-internet user households, which is less than the national average of 29.9%. The Mosaic Interactive Guide also shows that these mosaic types have an average to very-low likelihood to self-service.

According to the data all of these seven mosaic types are above the national mean (5.61%) for households without bank accounts. The average for these seven types is 9.6% with mosaic type 42 (South Asian communities experiencing social deprivation) averaging 18%. In terms of numbers within the CPZs however, the number of households within these seven mosaic types that do not have bank accounts is 1714 or 3.21% of all households. The mosaic types with the highest number of non-British households, are also amongst the highest with household income less than £15,000.

Taking the above into account, a higher proportion of households with residents of non-British backgrounds are likely to pay for their permits in cash, which will incur the cash-payment supplements. However, these mosaic types also have a high % of households without cars, in some instances more than 4 times higher than the national mean of 13.33%.

The CPZs W and E have extended hours of operation and residents receive a visitor's permit for this extended time period. The proposal is to withdraw these permits, and visitors will pay 50% of the cost of a virtual visitor pass during the extended time period (paragraph 4.15 of the Executive Report). Data shows that there are 2029 households within these CPZs and 59% of them are from 2 mosaic types (20 and 40) which are dominated by households of non-British (mainly Asian) backgrounds.

Religion or belief

No impact identified.

Sex

No impact identified.

Sexual orientation

No impact identified.

Socio-economic/income

This is not a specific protected characteristic group but may be a factor for a range of protected characteristic groups. According to the analysis, those households with an income less than £15,000 tend to also be those with a higher percentage of residents without bank accounts, on benefits and non-internet users. These residents are therefore more likely to prefer cash payments and are less likely to be able to afford the outlay for annual tickets. They will therefore be impacted by higher prices for permits bought with cash, and higher proportionate charges for shorter length permits.

However it is fair to deduce that those households on low income may not be able to afford a car. For example mosaic type 62 has the highest number of households with an income < £15,000. 52.69% of the households within this mosaic type do not have cars, which is significantly above the national average of 13.33%.

It is not possible to analyse the data in such a way that you can see how many households on low income own cars, but do not have internet access or direct payment accounts. However, the upper scale of the issue can be demonstrated by the following numbers:

There are 53,336 households in the CPZs (as part of this analysis, 44 were removed to simplify the dataset and 403 were unknown)

33,112 households have cars (20,224 households do not)

12,554 are non-internet using households.

8,551 Households have a household income less than £15,000 a year.

3,408 households have no direct payment account

5. Please describe the evidence you have used to make your judgement. What existing data for example (qualitative or quantitative) have you used to form your judgement? Please supply us with the evidence you used to make you judgement separately (by race, gender and disability etc).

The evidence below has been represented by the proposed pricing revisions.

Increasing permit prices by inflation

Increasing prices annually by the rate of inflation affects all residents across all CPZs. The annual prices rises will be dictated by the Retail Pricing Index, an index that is applies to many government services, including social housing rent increases. The rise in price by the RPI will ensure that the permit prices remain consistent with national inflation, and therefore ensure that the Council's income generation through parking permits remains consistent. This is not deemed to require an Equalities Assessment.

Residents permits

Simplification of emissions bands for multi-car households

The simplified proposal to have a single pricing band based on vehicle emissions and a £40 supplement for a second car, and a £80 supplement for a third car is effectively an overall "cost-neutral" change. It is therefore not deemed to have a significant impact on residents. Given the various combinations of vehicles that households may have, some combinations will cost slightly more than before, and others slightly less. The two examples below demonstrate this:

Scheme	Emissions band			Supplements	Total	Difference
	1st car	2nd car	3rd car			
	5	3	1			
Current	125	113	100	0	338	
Proposed	125	75	0	40 + 80 = 120	320	-18

The proposed new pricing scheme will cost £18 less for this combination of cars.

Scheme	Emissions band			Supplement	Total	Difference
	1st car	2nd car	-			
	4	2	-			
Current	100	75		0	175	
Proposed	100	50		40	190	15

The proposed new pricing scheme will cost £15 more for this combination of cars.

Given that the overall price changes from this pricing simplification will be "cost-neutral" in terms of income generation for the Council, this specific proposal is not deemed to have an equalities impact.

The parking shops currently do not gather equality information of users of the service, therefore the issues / impacts analysis is largely based on the Mosaic Public Sector 2009 Grand Index (updated November 2010) to cover all residents living in the CPZ areas. The following parking permit price changes will have an impact on residents:

- *Shorter length permits attracting a higher proportionate cost*
- *Supplements for phone-based transactions and cash-based payments*
- *Admin fee for renewing permits in the Wembley Event Day Protected Parking Scheme*
- *Visitor passes*

To analyse this impact on residents, the following indicators were assessed from the Mosaic Grand Index:

Source	Indicator	Description
Mosaic	Mosaic types	To identify how many households falling within each Mosaic type live within the CPZ areas, also expressed as a percentage of the total number of households in all CPZ areas. The Mosaic customer type was also referenced against corresponding equalities characteristics.
	Likelihood to self service	This indicator provides an insight as to whether customers are likely to take up the proposed service offer
	Service channels preference	This indicator provides an insight as to whether customers are more or less receptive to using online or phone services
Mosaic Public Sector 2009 Grand Index (updated Nov 2010)	Internet Usage	This indicator provides an insight as to whether customers tend to use the Internet
	General finances	This indicator provides an insight as to whether customer within a Mosaic type tend to own credit or debit card(s) or whether they have no direct payment account
	Benefit claimants	The percentage of people on benefits by mosaic type.
	Net annual income	The net annual household income.
	Disability	Percentage of households claiming disability benefit.
	Cars per household	Number of cars per household based on mosaic type.
	Ethnicity	Provides a breakdown of the percentages of ethnic groups by Mosaic type,
	Age	Provides a percentage breakdown of the population within the mosaic types. Age categories greater than 60 years have been considered.

In summary, there are 59 mosaic types within the CPZs. In order to simplify the data analysis all those mosaic types which represented less than 0.1% of the households in the CPZs were removed. This accounted for 28 mosaic types and in total, 0.70% of the households in the CPZs. A further mosaic type "Unknown – 99" was also removed as this did not contain any data to analyse.

Essential user day pass

This affects anyone carrying out statutory duties on behalf of the council, community care, NHS or charities and is therefore not deemed to be an equalities issue.

Bay suspensions

The majority of these permits are for businesses undertaking works on the road, placing skips etc. and is not deemed to be an equalities issue.

Business permits and associated changes

This is not deemed to be an equalities issue.

The data analysis undertaken is available to view and is presented in the following documents/spreadsheets:

- Mosaic type by CPZ.xlsx
- Likelihood to self service.xlsx
- Mosaic Grand Index.xlsx
- Mosaic Grand Index Data Analysis.docx
- Current emissions example calculation.docx

6. Are there any unmet needs/requirements that can be identified that affect specific groups? (Please refer to provisions of the Disability Discrimination Act and the regulations on sexual orientation and faith, Age regulations/legislation if applicable)

The key issues likely to impact on protected characteristic groups identified in Part 4 are:

- Difficulties for those on lower income, who can't afford the outlay for annual permits.
- Difficulties for those who don't have internet access, have difficulty using the internet and have no computer literacy.
- Difficulties for those who don't have a direct payment bank account.

The following table presents mitigation measures to address the above impacts:

Equalities trait	Impact	Mitigation
Age Race Socio-economic	Shorter length permits attract a higher proportionate charge.	None.
Age Disability Race Socio-economic	No home access to the internet	Applying for permits can be completed over the telephone. Free computer and internet access is available at Brent Libraries. Internet Cafes are also available at many locations throughout the Borough.
Disability	Application and payment online for those with visual impairment, physical impairment, hearing impairment and learning difficulties.	The Brent website has been designed to follow the accessibility guidelines issued by the World Wide Web Consortium (W3C) and the Royal National Institute of Blind People (RNIB). Text size for the site can also be changed using the browser. Access keys are available on Brent's website to help users move around the key pages of the site without having to use a mouse. Applying for permits and setting up/topping up a visitor permit account can be completed over the telephone.

		One to one support in completing parking transactions can be provided in local Council offices.
Age Disability Race	No computer literacy	One to one support in completing parking transactions can be provided in local Council offices
Age Race Socio-economic	No direct payment bank account	Option available to pay in cash.

In addition to the above, this assessment also identified potentially high visitor parking costs for those who require the services of carers. These residents would fall into the Age and Disability protected groups. The introduction of a Cared-for permit will mitigate this impact.

7. Have you consulted externally as part of your assessment? Who have you consulted with? What methods did you use? What have you done with the results i.e. how do you intend to use the information gathered as part of the consultation?

No.

8. Have you published the results of the consultation, if so where?

No.

9. Is there a public concern (in the media etc) that this function or policy is being operated in a discriminatory manner?

There has been some coverage in local newspapers expressing concern about the parking shops closing, highlighting how customers without access to the internet will obtain parking permits. However this has not specifically highlighted a discriminatory concern.

10. If in your judgement, the proposed service/policy etc does have an adverse impact, can that impact be justified? You need to think about whether the proposed service/policy etc will have a positive or negative effect on the promotion of equality of opportunity, if it will help eliminate discrimination in any way, or encourage or hinder community relations.

There is a potential impact for some groups on grounds of age, race, disability and socio-economic status. Those that have not been mitigated in section 6, are justified below:

Change	Impact	Justification
Shorter length permits attract a higher proportionate charge	Age Race Socio-economic	For those who can't afford the price of an annual parking permit upfront, shorter length permits are available for 3 and 6 months, albeit at a higher proportional cost. It is also proposed to introduce a new 1 month permit. This change better reflects the true cost of processing a permit for the same vehicle several times a year and adheres to the principle that buying a longer period permit should be reflected in a lower unit price.
Higher cost for permit applications made over the phone	Age Disability Race Socio-economic	This supplement is to account for administrative costs associated with applications made over the phone. It is also to encourage customers to move to the lower cost/higher satisfaction online channel.

Higher cost for cash payment	Age Race Socio-economic	This supplement is to account for additional costs associated with the new cash payment system. It is also to encourage customers to move to the lower cost/higher satisfaction online channel.
£15 renewal admin fee for Wembley Event Day Permits	Race	This fee is to cover the administrative costs associated with re-authenticating and issuing the permits. The charge is the average administrative charge levied by London Boroughs.
Daily visitor permits to be £1 for 4 hours instead of 1 day, and £2 for those bought using cash.	Age Disability Race Socio-economic	The change to four hours is to ensure that resident parking is better protected. The higher cash price is to account for additional costs associated with the cash payment system. It is also to encourage customers to move to the lower cost/higher satisfaction online channel.
Paying for visitor passes at the 50% discount rate for the extended hours of operation of the W, E & T CPZs.	Race Socio-economic	The change is to ensure that resident parking is better protected. The discounted rate is not deemed to have a significant financial impact.

11. If the impact cannot be justified, how do you intend to deal with it?

This EIA shows that the impacts can be either mitigated or justified.

12. What can be done to improve access to/take up of services?

A clear and effective communication strategy will improve take up of the services. The impact and effectiveness of the changes must also be monitored to ensure continuous improvement.

13. What is the justification for taking these measures?

The council needs to respond effectively to the central government changes to local authority funding and still deliver a high quality, consistent customer service offer to all residents despite tighter financial constraints and the need to make budgetary savings. The proposed changes to parking permit prices ensures that the pricing structure is simpler, and encourages a shift towards online processing and payment which is a lower cost with higher customer satisfaction.

14. Please provide us with separate evidence of how you intend to monitor in the future. Please give the name of the person who will be responsible for this on the front page.

The general equality duty is a continuing one, and equality considerations will be taken into account both when decisions are made and after the changes have been put in place. Equalities data is not currently captured within the Parking Service, and monitoring mechanisms will be introduced going forward.

Post implementation of the changes, there will be detailed analysis of key performance indicators including transaction volumes, transaction types, processing time and take up of the various service options by protected characteristic groups. This will enable the service to respond to issues that are identified. Responsibility for this will rest with David Thrane, Head of Safer Streets.

15. What are your recommendations based on the conclusions and comments of this assessment?

Current non-internet users may use the Councils free internet in Brent Libraries to process and pay for their parking permits. Although the actual numbers are unclear, there are around 12,554 non-internet using households within the CPZs. This could potentially have an impact on the limited

number of computers available at Brent Libraries.

Should the Council:

1. Take any immediate action? **No**
2. Develop equality objectives and targets based on the conclusions? **No**
3. Carry out further research? **No**

16. If equality objectives and targets need to be developed, please list them here.

Not applicable.

17. What will your resource allocation for action comprise of?

Signed by the manager undertaking the assessment:



Full name (in capitals please): David Thrall

Date: 16 August 2012

Service Area and position in the council: Head of Service. Safer Streets. Environment and Neighbourhood Services

Details of others involved in the assessment - auditing team/peer review: Christopher Taylor, Enforcement Officer, Safer Streets. Environment and Neighbourhood Services

Appendix B – Example communications



Park **Online**

it's e-easy

Renew a permit
Pay a fine
Instant and secure



Brent

www.brent.gov.uk/parking

Appendix C – proposed bay suspension arrangements

Suspensions - standard

- Minimum of 14 days notice required to allow parkers sufficient time to remove vehicle before suspension.
- Vehicles left in suspended bays, removed upon implementation.
- Removal costs payable by vehicle keeper.

Suspensions – short notice

- Short notice suspensions are ordinarily not permissible, to avoid removal of overstaying vehicles without sufficient advance warning. However, there are some emergencies and where public safety or security requirements take precedence, and therefore short notice suspensions are at the sole discretion of the Council.
- A short-notice administrative fee is payable in addition to standard bay charges.
- Removal of vehicles from short-notice suspensions can be arranged at the applicant's request. Vehicles parked in bays at time warning notices are erected cannot be removed as a parking offence, but can be relocated for a relocation fee payable in advance by the applicant. Vehicles parked in bay after warning notices are erected may be removed as a parking offence and the costs of removal will fall to the vehicle owner in the normal way.

Bay hijacking

When a bay is obstructed without authorisation, any unauthorised items removed from bays will be subject to a return fee, storage fee and disposal fee.

Cancellations and early reinstatement

Cancellations and early finishes (returning bays back to public use earlier than planned) are permissible provided at least one working days notice is given. A administrative fee will be deducted from any refunds due. Refunds can only be made for full days.

Appendix D – proposed resident permit prices illustrated

Band	1	2	3	4	5	6	7
Emissions (gCO ₂ /km)	<110	110-130	131-150	151-175	176-200	201-255	255+
	<110	1101-	1201-	1551-	1801-	2401-	3000
Engine size (cc)	0	1200	1550	1800	2400	3000	+
24 month permit							
1st vehicle	0	101	152	203	252	302	404
2nd vehicle	78	179	230	281	330	380	482
3rd vehicle	156	257	308	359	408	458	560
12 month permit							
1st vehicle	0	52	78	104	129	155	207
2nd vehicle	40	92	118	144	169	195	247
3rd vehicle	80	132	158	184	209	235	287
6 month permit							
1st vehicle	0	31	47	62	77	93	124
2nd vehicle	24	55	71	86	101	117	148
3rd vehicle	48	79	95	110	125	141	172
3 month permit							
1st vehicle	0	21	31	42	52	62	83
2nd vehicle	16	37	47	58	68	78	99
3rd vehicle	32	53	63	74	84	94	115
1 month permit							
1st vehicle	0	10	16	21	26	31	41
2nd vehicle	8	18	24	29	34	39	49
3rd vehicle	16	26	32	38	42	47	57

The base price on which all others are based, is an annual permit for a mid-range vehicle and is shown above circled.

Appendix E – current permit prices

Brent Band	1	2	3	4	5	6	7
For vehicles registered on or after 1st of March 2001							
Vehicle Emissions (gCO2/km)	<110	110-130	131-150	151-175	176-200	201-255	255>
Brent Band	1	2	3	4	5	6	7
For vehicles registered before 1st of March 2001							
Vehicle Engine Size (cc)	<1100	1101-1200	1201-1550	1551-1800	1801-2400	2401-3000	3000>
Resident Permit for 1 Year	1	2	3	4	5	6	7
1st Resident Permit	£0	£50	£75	£100	£125	£150	£200
Visitor Permit charges are in brackets	(£110)	(£110)	(£110)	(£110)	(£135)	(£160)	(£210)
2nd Resident Permit	£75	£75	£113	£150	£188	£225	£300
Visitor Permit charges are in brackets	(£110)	(£110)	(£123)	(£160)	(£198)	(£235)	(£300)
3rd Resident Permit	£100	£100	£150	£200	£250	£300	£300
Visitor Permit charges are in brackets	(£110)	(£110)	(£160)	(£210)	(£260)	(£300)	(£300)
Resident Permit for 6 Months	1	2	3	4	5	6	7
1st Resident Permit	£0	£31	£43.50	£56	£68.50	£81	£106
Visitor Permit charges are in brackets	(£56)	(£56)	(£56)	(£56)	(£68.50)	(£81)	(£106)
2nd Resident Permit	£43.50	£43.50	£62.50	£81	£100	£118.50	£156
Visitor Permit charges are in brackets	(£56)	(£56)	(£81)	(£81)	(£100)	(£118.50)	(£156)
3rd Resident Permit	£56	£56	£81	£106	£131	£156	£156
Visitor Permit charges are in brackets	(£56)	(£56)	(£81)	(£106)	(£131)	(£156)	(£156)
Resident Permit for 3 Months	1	2	3	4	5	6	7
1st Resident Permit	£0	£18.50	£24.75	£31	£37.25	£43.50	£56
Visitor Permit charges are in brackets	(£31)	(£31)	(£31)	(£31)	(£37.25)	(£43.50)	(£56)
2nd Resident Permit	£24.75	£24.75	£34.25	£43.50	£53	£62.25	£81
Visitor Permit charges are in brackets	(£31)	(£31)	(£34.25)	(£43.50)	(£53)	(£62.25)	(£81)
3rd Resident Permit	£31	£31	£43.50	£56	£68.50	£81	£81
Visitor Permit charges are in brackets	(£31)	(£31)	(£43.50)	(£56)	(£68.50)	(£81)	(£81)
Visitor Household Permit Band	1	2	3	4	5	6	7
Visitor Household Permit Charges are marked in brackets (only one permit per household can be issued)	As above	As above	As above	As above	As above	As above	As above
All Other Vehicles	3 Months		6 Months		1 Year		
Business Livered Permit	£60		£100		£180		
Business Permit	£90		£160		£300		
Doctor's Exempt Permit	£150 per Year						
Temporary Permit	£10 per Month						
Replacement Permit (Lost, stolen, or defaced permit)	£10 per re-print						