

Appendix A: Exemptions Review

School Streets

Exemption Category	Advantages of Exemption	Disadvantages of Exemption	Practicality	Officer Comments and Recommendations
Residents / Businesses located within the SS	Granting exemptions for residents & businesses will allow them to access / exit their properties without being inconvenienced.	The process of managing the exemption will require a robust system to manage applications and approving permits or exemptions although there may be scope to incorporate this into existing parking permit / PBM systems. Cost implications	Recommendation to have a designated staff member based in Parking Team to collate exemption list for all school streets looking to use Ringo or similar in the future	Grant exemption – YES Officers appreciate the work involved and cost to develop a permit system for the school streets and for a designated member of staff to oversee this but agree it is essential that all residents and businesses located within the SS zone must be able to gain access to their property during the hours of operation
Vehicles of Blue Badge holders, resident within the SS			Resident BB holders exempted as other residents as Permit holders as shown above	Grant exemption – YES As detailed above and the proposed CCTV cameras will help overcome the current obstacles of gaining access when school staff are not present to move the barriers/cones
Blue Badge holders, not resident within the SS	Blue Badge holders will be able to access their properties, or those they are visiting, more readily.	An issue around provision of this exemption is that the holder of the BB may not be the driver of the vehicle.	Impossible to ascertain by camera whether a BB is in use or not If the sign displaying the BB symbol is used then it applies to all BB holders which may become difficult to manage as the CCTV system is only reading the vehicle registration. The alternative is to use the 'permit holder' sign variant as resident BB holders will be exempted in the same way as other residents.	Grant exemption – NO Whilst officers appreciate that these Blue Badge holders may have mobility problems but as they do not live within the SS and require direct access to their home they are able to drive to their destination via an alternative route It was agreed that parents or children attending the school that have a Blue Badge can apply for a permit.
Emergency Blue Light services including London Ambulance Service but not private ambulances	Allowing access will ensure emergency service vehicles to respond as quickly as possible.	There are no clear disadvantages to emergency service vehicles (responding to emergencies) being exempted from the restrictions	'Emergency services' is not a permitted variant of the sign for this restriction without special authorisation from DfT but can be included in the supporting traffic order. Exemption should be discussed with local emergency services	Grant exemption – YES All agreed this is an essential requirement that all emergency services vehicles are exempt to ensure nobody is put at risk as the result on introducing a SS The emergency services will fully support this decision as CCTV camera enforcement was identified as their top priority via feedback from the trials. Note: Police requested we remove the clause ' <i>in an emergency only</i> ' after the orders were already made. This will be addressed when the TMO is reviewed following approval of this report
Delivery vehicles	Vehicles (commercial vehicles) making deliveries to resident / business premises will be able access the respective properties. The exemption may also avoid any issues around the potential for a public inquiry in connection with the possible impact of the timings of the restrictions on loading	Granting exemption would require either a robust permit system to allow exemptions to be applied, which could not be done at short notice or, alternatively, to pick cases up at the review stage before PCNs are issued. Either will require additional resource to either manage exemptions or at the review stage. Other vehicles (i.e. non-commercial) would need to arrange deliveries outside the operational hours of the controls.	Commercial delivery vehicles should be readily identifiable at the review stage to avoid PCNs being issued in error	Grant exemption – YES Officers appreciate managing this element could be very complex and will require careful management at the footage review stage but it was agreed that residents and businesses located within the SS should still be able to have deliveries and whilst the One Network satnav system will highlight restrictions it is not always possible to change the time of a delivery. It should be noted that this is only for deliveries being made within the SS, if a driver is seen using this as a

				short cut or if a PCN is issued and evidence cannot be provided to show a delivery was being made the PCN will be upheld.
Carers	Allowing an exemption for carers may allow access to clients to be undertaken more readily.	Granting exemption here is likely to require a robust permit system to allow exemptions to be applied for, possibly at short notice, and which may require additional resource to manage.	Need to allow access to carers who are visiting residents. A dedicated email and phone number should be made available for residents to arrange visits	Grant exemption – YES Officers understand that this could be complex to manage especially if different carers are visiting the resident and also some family members carry out this role. It agree that carers should be allowed access as they are providing essential services to residents and it is not possible to arrange this outside of the SS hours of operation as most clients often require early morning visits to assist them with getting up, dressed etc.
Licensed Taxis (black cabs)	Taxis form an important transport option for many with mobility and visual impairments and recognise the Taxicard scheme which offers subsidised travel in licensed taxis to London residents with serious mobility impairments or who are severely sight impaired. It may be the case that taxis are not given a physical exemption as such but as they are readily identifiable from other traffic, PCNs could be cancelled at the review stage	It is unlikely to be possible to determine whether the passenger in the taxi is using the Taxicard or not and therefore the exemption could be subject to abuse.	UK regulations define a hackney carriage (black cab) as a taxicab allowed to ply the streets looking for passengers to pick up, as opposed to private hire vehicles (sometimes called minicabs), which may pick up only passengers who have previously booked or who visit the taxi operator's office. Black cabs should be readily identifiable at the review stage of any potential contraventions to ensure PCNs are not issued incorrectly	Grant exemption – YES Agreed to allow access as they provide a vital service for elderly and disabled residents and are easily identifiable
SEND / Taxicard transport services (school transport)	Allowing an exemption for medical appointment vehicles may allow access to clients to be undertaken more readily. SEND children will have safe access to school and their parents will not have to worry about them walking the last phase of the journey if they are capable of doing so.	It is not possible to determine whether the passenger in the vehicle is using the Taxicard or not and therefore a PCN would be issued (to the keeper of the vehicle) and an appeal required.	These vehicles are arranged by the school and should therefore have information to notify the council in advance of their arrival. Council or liveried vehicles should be readily identifiable at review stage	Grant exemption – YES Agreed access should be allowed as children using SEND transport have been assessed and alternative modes of travel are not a viable option. Some arrive in wheelchairs and others are only able to walk short distances. The vehicles are managed by the Council and easily identifiable at the review stage if the regular minibus isn't in use. With regards to Taxicard use it was agreed these vehicles should be exempt as they are providing a vital service for residents that have serious mobility or visual impairments
Council operational vehicles (undertaking statutory services)	Allowing access for certain council vehicles will allow statutory functions to be undertaken as effectively as possible. The impact of the restrictions on refuse collection, street cleaning etc. would be significant if they had to be curtailed at the point of the restriction.	As the exemption to council vehicles isn't displayed it could lead to complaints around these vehicles seemingly ignoring the restriction, particularly if liveried as council vehicles. The term 'authorised vehicles' has been used on signs in some boroughs but requires special authorisation by DfT	Details of any relevant council vehicles should be able to be added to exempt list in advance or readily identifiable at review stage This is not a permitted variant of the sign for this restriction but can be included in the Traffic Order	Grant exemption – YES It was agreed these vehicles should be allowed access to ensure residents have access to statutory council services such as refuse collection. As no alternative route is available during the times of operation it could lead to significant delays providing these services.
Council and other public service staff with Essential User permits using their own vehicles (while undertaking statutory services) Non-essential services	These drivers would not have to plan or use an alternative or reschedule their visits	It is not possible to determine whether the vehicle has an ESU permit or not and therefore a PCN would be issued and an appeal required.		Grant exemption – NO As these officers are not carrying out statutory duties they can reschedule their visits around the restricted times or park outside of the SS zone and walk. These Council workers should lead by example and consider other modes of travel such as walking or cycling. This would help support Brent's travel and Climate Emergency Delivery plan.

Medical appointment transport	Allowing an exemption for medical appointment vehicles may allow access to clients to be undertaken more readily.	Granting exemption here is likely to require a robust permit system to allow exemptions to be applied, possibly at short notice	A dedicated email and phone number should be made available for residents / providers to arrange visits	Grant Exemption – YES Whilst officers appreciate it is not easy to identify these vehicles and requests for permit could be requested at short notice it is vital that residents living within the SS zone are able to access medical appointment related transport as they may not be able to walk to the end of the zone to meet up with the vehicle.
Covid19 volunteers	Allowing an exemption for Covid19 volunteers' vehicles may allow access to clients to be undertaken more readily.	Granting exemption here is likely to require a robust permit system to allow exemptions to be applied, possibly at short notice.		Grant exemption – NO Although the Covid19 volunteers are no longer operating in the borough it was agreed that if reinstated as with other Council officers they should lead by example and use alternative routes or modes of travel.
Dial-a-Ride	Allowing an exemption for Dial-a-Ride vehicles may allow access to clients to be undertaken more readily.		Dial-a-ride are clearly identifiable and should therefore be readily identified at the review stage to avoid PCN being issued.	Grant exemption – YES Agreed as they provide a vital service for elderly residents and those with mobility problems
Royal Mail	Allowing an exemption for Royal Mail vehicles may allow access for deliveries / collections to be undertaken more readily	As the exemption to Royal Mail vehicles isn't displayed it could lead to complaints around these vehicles seemingly ignoring the restriction. The term 'authorised vehicles' has been used on signs in some boroughs but requires special authorisation by DfT	Royal Mail vehicles are clearly liveried and can be identified at the review stage and contraventions not progressed to PCNs (i.e. effectively cancelled).	Grant exemption – YES As with delivery vehicles it was agreed Royal Mail vehicles should be exempt as they can be easily identified at the review stage, however it should be made clear to The Royal Mail that this is for deliveries being undertaken within the school street and not just to pass through.
Trades vehicles (builders etc.)	Allowing an exemption may allow trades persons to access their customers more readily.	Providing exemptions for the numerous vehicles that could fall within this category could negate the benefits of the scheme and could place a significant burden on the team checking applications etc.	Exemption not extended to this category and access would need to be arranged outside the operation of the restrictions	Grant exemption – NO Agreed that access can be arranged before and after the hours of operation.
Medical practitioner	Allowing an exemption for medical practitioners' vehicles may allow access to patients to be undertaken more readily.	It is unlikely to be possible to determine whether the vehicle is being used in relation to medical appointments or not and therefore the exemption could be subject to abuse. However, the provision of access in this case may be necessary to respond to emergency calls. These may have to be dealt with on appeal where PCN is issued	Essential for welfare visits	Grant exemption – YES Agreed this is essential for welfare visits and medical practitioners should have access to their patients at all times
Utility Providers	Allowing an exemption may allow utility providers to access their equipment and customers readily.	Providing exemptions for the numerous vehicles that would fall within this category could negate the benefits of the scheme and could place a significant burden on the team checking applications etc.	Emergencies only. Exemption may have to be provided but in the event of an emergency there may not be an opportunity to arrange / apply so any PCNs may need to be dealt with at appeal, possibly with supporting evidence of attending an emergency.	Grant exemption – NO Officers agreed that these drivers can gain access outside of the hours of operation, however access could be arranged in emergency circumstances such as burst water pipes and power cuts.
School Staff	Providing school staff an exemption will allow them to access the school premises / on-street parking within the HN more easily	Not providing an exemption may prevent staff from accessing parking facilities on the school grounds which may add difficulties for those carrying school materials, books etc.	For access to on-site parking on the school premises or on-street parking that staff have permits for	Grant exemption – NO As with Council workers school staff should be leading by example, promoting active travel and where possible using alternative modes of travel. This will help to support their school travel plan activities and hopefully encourage parents and children to do the same.

				As most school staff start work before the school street is in operation this will not affect them gaining access to on site car parks. In exceptional circumstances it would be possible to arrange emergency access providing this is to park on the school premises.
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