



**Cabinet**  
13 October 2014

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

Wards Affected:  
ALL

**Event Day Parking and Vehicle Removals Pilot, and future  
arrangements for remaining visitor scratch cards**

**1.0 SUMMARY**

- 1.1 In April 2014 the Council's Executive (Cabinet) decided to make some alterations to the Council's methods for removing illegally parked vehicles, and also relax Civil Enforcement Officer deployment on Wembley Stadium Event Days.
- 1.2 This report summarises the impact of the trial on the Council's Vehicle Removal operations, and consequently makes recommendations for future vehicle removal activity.
- 1.3 This report also provides an update on the validity of Visitor Parking Scratch Cards, which were scheduled to be removed from circulation on 31<sup>st</sup> August 2014.

**2.0 RECOMMENDATIONS**

- 2.1 That the Cabinet notes the findings of the Removal Pilot set out in paragraphs 3.5 to 3.11, the changes made between the start and end of the trial, and also the Financial Implications as set out in paragraphs 5.1 to 5.8.
- 2.2 That the Cabinet agrees to continue the use of the revised criteria for vehicle removal which have resulted from operating the trial, and also the implementation of proposed Customer Enhancements.
- 2.3 That the Cabinet delegates to the Operational Director, Environment & Protection authority to make minor amendments to the criteria and arrangements, on a continuing basis in consultation with the Lead Member for Environment. Any such change(s) would be subject to the agreement of the Chief Finance Officer.
- 2.4 That the Executive agrees to extend the validity of visitor parking scratch cards, already in circulation, indefinitely.

### 3.0 Vehicle Removal Pilot

#### Pre-Pilot

- 3.1 The intention of the vehicle removal pilot was to focus the Council's enforcement resource on those offences classified as more serious, and relax the enforcement of offences deemed to be less serious. Those offences considered to be more serious are those which may create traffic congestion, or affect road safety.
- 3.2 Officers also considered those offences where enforcement may be limited to the issue of Penalty Charge Notices. The goal of enforcement is to encourage compliance, and for resident / pay and display bay offences, it was thought that compliance could be achieved without impounding vehicles.
- 3.3 The pilot therefore proposed extensive alterations to the criteria for impounding vehicles. The pilot relaxed the criteria of 13 contravention types prior to the trial beginning.
- 3.4 The pilot commenced at the beginning of May 2014.

#### During Pilot

- 3.5 **May 2014.** The effects of the pilot were felt immediately, with 56% decrease in removal activity between the months of April and May. Most notably, activity fell from parking contraventions incurred in resident parking bays. From an operational perspective, the largest impact was for yellow line offences; concerns were raised that under the revised criteria some vehicles which were obstructive to the flow of traffic were not being effectively managed.

	Yellow Line Offences	Paid For Parking Bay Offences	Resident Bay Offences	Driveway/ Dropped Kerb Offences	Footway Parking Offences	Other Offences	Total
April-2014	81	8	79	35	14	15	232
May-2014	62	2	7	19	0	13	103
% Increase / Decrease	-23%	-75%	-91%	-46%	-100%	-13%	-56%

- 3.6 Following meetings with the Council's main Contractor, Serco to monitor the impact of the pilot, it became clear that the effect of observing a 15 minute period (double yellow lines), and a 1 hour period (single yellow lines) before removing a vehicle was generating unresolved safety issues and congestion on the borough's road network.. Following a recommendation from officers it was agreed that criteria for removing vehicles from yellow lines should be amended, reverting the minimum observation period back to 'instantly' removing vehicles from yellow lines. This change was implemented from the beginning of June. Appendix A records the approval given.
- 3.7 **June 2014.** The monitoring meetings noted that yellow line removals had returned to pre-pilot levels, but that new concerns had arisen regarding the non-removal of vehicles blocking access into resident driveways. Residents complained that they were unable to access their driveways when returning home, and were therefore forced to park on the public highway. Officers therefore recommended reintroducing the pre-existing methods for

this contravention type and this was agreed to be implemented from the beginning of June. Appendix B records the approval given.

- 3.8 **July onwards.** No further changes to the revised removal strategy were recommended by officers on the basis that no negative effects were noted operationally from the relaxation of the 11 other contravention types.

## Overall Effect

- 3.9 In summary, from the point of view of service delivery, the effect of the pilot has been a success. There have been no notable adverse effects from ceasing removals from resident bays; officers have not received complaints about residents struggling to find available parking within CPZs.

- 3.10 Drawing from direct comparisons between the four months preceding the pilot, and the first four months of the pilot, officers have noted the following changes:

- An increase of 14% in vehicles being removed from yellow lines. This may be viewed as a positive effect of the pilot; by not deploying trucks to residential streets, there is an increased capacity to enforce yellow line offences and relieve congestion in the borough.
- A decrease of 97% in the number of vehicles removed from residential streets. The scale of the effect suggests that many of the vehicles being removed pre-pilot were first time contraveners rather than persistent evaders. Officers consider that a PCN is more appropriate in these circumstances and the new arrangements have reduced the risk of impounding those who made genuine mistakes of parking in the wrong zone, not fully understanding the visitor parking arrangements, or forgot to renew their resident permit, rather than customers who purposely avoid paying to park.
- An overall decrease of 45% in the volume of vehicles being removed to the Council's car pound (see table below).

	Yellow Line Offences	Paid For Parking Bay Offences	Resident Bay Offences	Driveway / Dropped Kerb Offences	Footway Parking Offences	Other Offences	Total
<b>4 Months Before Trial</b>	286	27	354	142	49	59	917
<b>4 Months After Trial</b>	327	2	12	96	9	61	507
<b>% Increase/Decrease</b>	14%	-93%	-97%	-32%	-82%	3%	-45%

- 3.11 Overall, it is now forecast that we will remove just over 2,000 vehicles in 2014/15 compared with 3,085 in 2013/14 and an average of 4,000 vehicles over the three years from 2010/11 to 2011/12. Based on the numbers of removals across London in 2013/14 this would have meant that Brent removed the tenth highest number of vehicles compared to our actual position in that year of removing the third highest number of vehicles. Officers plan to closely monitor the effects of the changes for the remainder of the year. Should further

alterations be required to maintain good operational/professional practice, officers propose to make changes in consultation with the Lead Member for Environment.

## **Proposed Customer Enhancements**

- 3.12 Officers have noted the lack of signage for directing our customers to the Council's Car Pound at Whitby Avenue, Park Royal. Officers therefore proposed to erect new directional signage at the following locations: Abbey Road, at its junction with the North Circular Road; Abbey Road at its junction with Whitby Avenue; and Abbey Road at its junction with Coronation Road.
- 3.13 Officers note one of the potential benefits of the new Parking Permit database, is a more accurate record of customer contact details; particularly in respect of email addresses, and mobile telephone numbers. At the moment, customers who return to the place they left their vehicle, need to contact a service provided by London Councils, called TRACE, who will advise them of the location of their vehicle (if the Council have removed it). This can be a fairly stressful experience for the customer, who may think (in the first instance) that their vehicle has been stolen. Officers propose to use customer information more intelligently and where possible contact customers by email / text message to let them know that their vehicle has been taken to the car pound, directions to the car pound, opening hours, proofs required to release their vehicle, and payment information. This enhancement has been introduced from 15 September 2014

## **4.0 Visitor Scratch Cards**

### **Background**

- 4.1 In September 2012, the Council's Executive decided to adopt different methods of interacting with our customers. Principally, this meant replicating and improving the services we offered over the counter, with online services (and some telephone services).
- 4.2 At the beginning of 2013, the Council's parking shops closed, and the Council ceased selling its highest volume product; visitor scratch cards. The alternative, Virtual Visitor Parking Passes became the new method of booking visitor parking.
- 4.3 In order to make a clean break from the old method, and enable enforcement efficiencies (the new visitor parking system has an electronic link to enforcement systems), an expiry date was set for scratch cards to be removed from circulation.
- 4.4 As the Council did not possess extensive records relating to the volume of stock remaining in circulation, the Executive (July 2013) agreed to allow officers to implement a scratch card exchange scheme, in which, holders of scratch cards would be able to exchange them for visitor parking credit on the Council's new database.
- 4.5 Unfortunately, further investigation in partnership with Serco (the Council's principal parking contractor), proved that the cost of implementing an exchange scheme would outweigh the benefit, and there was a risk that some of our residents may miss the opportunity to take advantage of such a scheme. On this basis, a decision was taken to extend the validity of scratch cards to the 31<sup>st</sup> August 2014.
- 4.6 Surveys now indicate that the remaining stock of scratch cards is dwindling; fewer vehicles appear to be displaying the cards. Use of the online visitor parking system continues to grow, with in excess of 30,000 transactions per month. However, a number of scratch cards

are still being displayed, suggesting that the potential effect of invalidating their use may be negative, and create a sudden demand for refunds or exchanges.

- 4.7 Officers have tentatively revised the validity date extending scratch card validity to December 2014, but are now seeking to extend the validity of scratch cards indefinitely. There seems to be little merit in extending the scheme validity for short periods, when scratch card circulation will naturally reduce as users finish their stock.

## 5.0 FINANCIAL IMPLICATIONS

- 5.1 The financial implications for the service are significant, although they were anticipated when the pilot was envisaged.
- 5.2 In order to ensure good governance, the Council has carried out the following forecast of expenditure and income. It is not, however, an objective of the Council's civil parking enforcement policy to raise revenue.

### Expenditure

- 5.3 The reduced income from fewer vehicle removals cannot be offset by an equivalent reduction in expenditure on the basis that the Council's removal operation had been designed against historical volumes of work and removal protocols. Many of the equipment costs, including the cost of providing removal trucks, are depreciated over the term of the enforcement contract. The Council also have commitments in terms of the Council's car pound at Whitby Avenue, which is leased by Contractors Serco, and shared with the London Borough of Hounslow.
- 5.4 Rather than reduce budgeted expenditure on removals, mainly made up of accommodation costs, and deployed hours, officers are working with Serco to identify further efficiencies in the Service; potentially using the trucks to perform additional functions, or shared duties.

### Income

- 5.5 The relaxation of enforcement methods has generated a pressure in the parking account. The budgeted revenue expectations are based upon historical patterns, and the 2014/15 budget for vehicle removal income is £800k p.a. This revenue is anticipated from removal fees (£200 per removal) and storage fees (£40 per 24 hours).
- 5.6 The effects of the Pilot are demonstrated in the table below:

	Vehicles Removed	Receipts £	12m Extrapolation £
4 Months Before Trial	917	180,461	721,846
4 Months After Trial	507	104,580	418,320
% Increase/Decrease	-44.71%	-42.05%	-42.05%

- 5.7 The four months preceding the trial suggest that there were pre-existing pressures on the parking account of approximately £80k p.a. (as demonstrated in table 5.6; the budgeted figure of £800k minus £721k). Officers believe this to be a direct effect of a lower volume of on-street issuance in general terms; all enforcement activity is intrinsically linked. That is to say that the majority of removals are pre-identified by Civil Enforcement Officers rather than self-generated by the staff working on the truck.

- 5.8 The effect of the pilot has been to reduce the income generated from vehicle removal operations. The full year cost of this is estimated to be £303k. The total pressure on the account is therefore £382k.

## **Pressure**

- 5.9 The Parking Account is performing well for the year to date, and may produce a modest surplus even with the forecast pressure on vehicle removal income. If the recommendations in this report are agreed, it is proposed that the Service manages the pressure for the remainder of the current year. For 2015-16 this income reduction of £303k would be additional growth for the Council's budget, and would add £303k to the Council's existing savings target of £33m for 2014-15 (which has not yet been bridged)

## **6.0 LEGAL IMPLICATIONS**

- 6.1 The details of a local authority's power to remove illegally parked vehicles is set out in the following legislation:
- The Civil Enforcement of Parking Contraventions (England) General Regulations 2007 (SI 2007/3483);
  - The Civil Enforcement of Parking Contraventions (Representations and Appeals) (England) Regulations 2007 (SI 2007/3482);
  - The Removal and Disposal of Vehicles (Amendment) (England) Regulations 2007 (SI 2007/3484);
  - The Traffic Management Act 2004.
- 6.2 Consideration also needs to be given to the Statutory Guidance from the Department for Transport which addresses the issue of the removal of vehicles by local authorities to enhance and improve the enforcement of parking regulations and the Penalty Charge Notice system, to assist payment of Penalty Charge Notices and to reinforce existing transport policies (for example, by targeting vehicle removal operations in bus lanes).

## **7.0 DIVERSITY IMPLICATIONS**

- 7.1 The Council is mindful of its duty under s.149 Equality Act 2010 (the 'Public Sector Equality Duty'). In the present case, there are no adverse diversity or equality implications. In particular, there are no adverse issues affecting blue badge users or disabled people who rely heavily on their vehicles for mobility.

## **8.0 STAFFING / ACCOMMODATION IMPLICATIONS**

- 8.1 None

## **BACKGROUND PAPERS**

Event Day Parking and Vehicle Removals – Executive, 22<sup>nd</sup> April 2014

(<http://democracy.brent.gov.uk/documents/s23139/en-event-day-parking.pdf>)

Parking service simplification and pricing – Executive, 19<sup>th</sup> September 2012

(<http://democracy.brent.gov.uk/documents/s9446/ens-parking-permits.pdf>)

Statutory consultation on proposed changes to parking tariffs charges and permits – Executive, 15<sup>th</sup> July 2013

(<http://democracy.brent.gov.uk/documents/s18275/en-parking-consultation.pdf>)

## **CONTACT OFFICERS**

Michael Read

Operational Director, Environment & Protection

[michael.read@brent.gov.uk](mailto:michael.read@brent.gov.uk)

020 8937 5302

SUE HARPER

Strategic Director Environment and Neighbourhood Services

## **APPENDIX A**

### **Event Day Parking and Vehicle Removals**

#### **Change Control 1**

This document executes changes to the criteria used to guide the Council's parking contractor in respect of vehicle removal operations. Due to the variability of the new pilot approach, the impact on residents and the associated risks, it is proposed that adjustments to the pilot approach outlined in the Executive report be adjusted on the monitored outcome.

#### **Review Period**

May 2014

#### **Commentary**

The Head of Parking and Street Lighting has reviewed the impact of the pilot for the period 1st May 2014 to 31<sup>st</sup> May 2014 and concluded the effect of the pilot to date has been substantial. There has been a reduction in enforcement in almost all contravention types. The most significant reductions have been in the removal of vehicles from Resident Parking Bays and the removal of vehicles from Yellow Lines.

#### **Proposed Changes**

It is of note that the operational impact of the piloted changes on the removal of vehicles from yellow lines has detrimental traffic management (Network Management Duty) implications for the Council. The piloted change provides an observation period of an hour for vehicles parked on single yellow lines, and an observation period of 15 minutes on double yellow lines. Officers request that these observation periods are reverted back to 'instant' removal; the Council require to move dangerous/obstructive parking in the fastest possible time.

If agreed, this change shall be implemented from the 1<sup>st</sup> June 2014.

Proposal agreed by

Jay Judge  
Interim Head of Parking & Street Lighting  
Environment & Neighbourhoods



Michael Read  
Operational Director, Environment & Protection  
Environment & Neighbourhoods



## **APPENDIX B**

### **Event Day Parking and Vehicle Removals**

#### **Change Control 2**

This document executes changes to the criteria used to guide the Council's parking contractor in respect of vehicle removal operations.

Due to the variability of the new pilot approach, the impact on residents and the associated risks, it is proposed that adjustments to the pilot approach outlined in the Executive report be adjusted on the monitored outcome.

#### **Review Period**

June 2014

#### **Commentary**

The Head of Parking and Street Lighting has reviewed the impact of the pilot for the period 1st June 2014 to 30<sup>th</sup> June 2014 and concluded the effect of the pilot to date has been substantial. There has been a reduction in enforcement in almost all contravention types. The most significant reductions continue to be in the removal of vehicles from Resident Parking Bays, although the effect on the removal of vehicles from Yellow Lines has reduced since the last reporting period. Officers and their Contractor have also noted an increasing number of complaints generated from residents who are unable to access their driveway.

#### **Proposed Changes**

The pilot proposed changes to the criteria for removing vehicles blocking access to driveways; if residents are blocked into their driveways, the Council will provide a removal service, however, if residents are blocked out of their driveway the Council would not provide a service. This policy change has been to the detriment of our resident's experience from the Council's Parking Service. It is proposed that the Council re-establish the methods used before the pilot began. If agreed, this change shall be implemented from the 1<sup>st</sup> June 2014.

Proposal agreed by

Jay Judge  
Interim Head of Parking & Street Lighting  
Environment & Neighbourhoods



Michael Read  
Operational Director, Environment & Protection  
Environment & Neighbourhoods