

Communities Overview and Scrutiny Committee

9 January 2020

On-street Parking Consultation Analysis and Proposed Way Forward

Recommendation(s)

1. That the analysis of the parking consultation feedback as provided in Appendix A is noted.
2. That the proposed changes to on-street parking management as provided in section 2 below are endorsed by the committee and put forward for consideration at Cabinet.
3. That a short-duration Task and Finish Group be established to investigate other aspects of on-street parking management, such as business permitting and environmental considerations.

1.0 Key Issues

- 1.1 Proposals to change the management of on-street parking within the civil parking enforcement (CPE) areas of Warwickshire were presented at Cabinet on 11 April 2019.
- 1.2 The following bullet points summarise the proposals in the above Cabinet report:
 - permit prices to rise in a tiered manner – first permit £35, second permit £55, third permit £80 (see also para 1.6 below)
 - a move away from paper-based permitting to digital virtual permits
 - a limit on the amount of annual visitor parking – 600 or 1200 hours visitor parking options
 - a small increase to guesthouse visitor parking from £3 to £5 per 24 hours
 - suspensions and dispensations to be £15 per day per parking place
 - a small rise to pay and display charges and the reintroduction of linear charging
- 1.3 At that Cabinet meeting it was resolved that wider consultation with stakeholders was necessary and that, subsequently, additional consideration should take place at Communities Overview and Scrutiny Committee.
- 1.4 Accordingly, a period of consultation took place from 22 July 2019 to 22 September 2019.

- 1.5 The main issues consulted upon were potential price rises to residents permits, a change from paper permitting to digital online virtual permitting, potential restrictions on visitor's parking availability and a small increase to pay and display charges.
- 1.6 It should be noted that an additional permit pricing structure option of £80 per permit was added to the consultation exercise. This was not in the original Cabinet paper and was added to reflect the actual administrative cost of running resident's permit schemes.
- 1.7 Over 17,000 permit-eligible residents, guesthouse proprietors and Park and Ride users were contacted directly, advised of the consultation and directed to our Ask Warwickshire online survey site to provide their responses after consideration of the supporting information.
- 1.8 Residents without access to the internet were also catered for, via a paper copy of the questionnaire and associated documentation, which they could obtain by contacting the Council. Alternative languages were available on request.
- 1.9 The News team was briefed to deal with enquiries, the Traffic and Road Safety blog contained information and a link to the survey site and on-site notices were placed at Stratford Park and Ride, alerting users to the proposals.
- 1.10 Two Equality Impact Assessments were produced which considered the potential impacts of the proposals on potentially vulnerable groups. These are live documents and are updated accordingly in response to feedback.
- 1.11 We received contact from Equip Warwickshire: Equality and Inclusion Partnership expressing concerns on behalf of residents from Benn ward. These concerns included the proposed costs of the permits and the impact on child poverty and income deprivation, the nature of the consultation itself including provision for alternative languages, and accessibility of the proposed virtual permitting scheme on religious and age-related grounds.
- 1.12 We have engaged with Equip and responded to their concerns directly and through the updated EqIAs. Our consultation and engagement team have considered the concerns raised by Equip in relation to the nature of the consultation and will continue to work with the Equality, Diversity and Inclusion team to review best practice to ensure consultations remain as accessible as possible.
- 1.13 Residents were asked for opinions on proposed permit price rises, changes to the visitor management process and the move from paper permitting to digital online processes.

- 1.14 2,516 questionnaire responses were received from residents, visitors, guesthouses and Park and Ride users. Of these, the vast majority, 2394, were online. 122 paper copies were returned. An additional 35 comments were received via email and 18 copies of the same letter from Rugby.
- 1.15 The heads of the three district and borough councils currently within CPE which have pay and display parking zones received letters advising them of the proposals to raise pay and display charges and inviting a response.
- 1.16 Local groups representing business interests, such as BID companies and Chambers of Trade, were written to, with details of the proposed increase to pay and display charges and an offer to meet and discuss. In addition to the initial contact, meetings then took place separately with representatives of both Leamington Spa BID and the Leamington Chamber of Trade.
- 1.17 The overall consultation response rate was close to 15%. Many consultations do not receive much more than ten percent response so this would suggest that the consultation was extremely wide-reaching and effective in communicating with its target audiences.
- 1.18 Written responses were also received from Leamington BID and the Leader of Rugby Borough Council, Cllr Lowe.

2.0 Options and Proposals

- 2.1. Analysis of the consultation feedback was carried out by our Insight Team and is available as a report as **Appendix A**.
- 2.2. The **headline** responses from residents in relation to the proposed changes to permitting were as follows:
- 2.3. Approximately 85% of respondents disagreed with the proposal to increase permit prices to the flat rate option of £80 per permit, with just seven percent in agreement.
- 2.4. The proposal to increase permit prices in accordance with the tiered pricing structure had a broader range of response, with 46% in broad agreement and 39% against.
- 2.5. Faced with a binary choice between the two options, 81% preferred a tiered charging approach with 18% opting for a flat rate option. Respondents were asked whether they preferred a flat rate or a tiered rate. Choice of preferred approach was not taken as an indication of agreement with the proposed prices.
- 2.6. Comments received as part of the feedback indicated that there was broad opposition to raise permit prices at all, with both pricing options seen as too high and questions over the lack of parking spaces, poor enforcement and value for money.

- 2.7. With regard to the proposed switch to an online permit management system, 74% of respondents stated that they would use such a system with 11% saying that they would not.
- 2.8. Interestingly, these figures are broadly in line with national internet usage figures provided by the Office for National Statistics in 2018 which indicated that just ten percent of UK citizens do not use the internet.
- 2.9. Those respondents who requested and returned paper questionnaires were far more likely to prefer not to use an online permit management system.
- 2.10. Permit eligible consultees were also asked for their opinion on controlling the misuse of visitor's permits through a proposed switch to online digital processes.
- 2.11. 49% of respondents agreed with these proposals to manage visitor permit misuse in this way with 36% in opposition.
- 2.12. However, 31% of respondents to the visitor parking question stated their opposition to the proposals to restrict visitor parking through an annual allowance of days or annualised hours. The most frequent response here was that this restriction was unfair.
- 2.13. The majority of guesthouse respondents were not in favour of a move to online permitting. Comments concerned ease of use and impacts on the viability of businesses.
- 2.14. The leader of Rugby Borough Council wrote to express his view that the proposed permit prices were too high.
- 2.15. Leamington BID and Leamington Chamber of Trade both provided responses which considered the potential price rises to pay and display charges. Their responses were broadly critical of the proposed rise to pay and display charges, indicating that this might have a negative impact on footfall within the town and that any rise was not supported by evidence of service improvements or increasing costs.
- 2.16. No other formal responses were received.

Proposals

Residents permit pricing

- 2.17. The consultation feedback has demonstrated that the option to increase permit prices at all is generally unwelcome, with a significant number of negative comments.

- 2.18. The potential introduction of a flat rate of £80 per permit, despite making the permitting scheme self-financing and being reasonable in the national context of permit prices, is a substantial rise on the existing charges and attracted most opposition.
- 2.19. Of the two consulted upon options the least unwelcome is the tiered approach which would have seen a staggered permit pricing system of £35 for the first permit, £55 for a second permit and £80 for a third permit.
- 2.20. However, it is recognised that the proposed increases come at a time when family finances are under pressure and that there are areas of Warwickshire suffering from deprivation which would be most affected by the proposals.
- 2.21. Therefore, despite the requirement to introduce a permitting scheme which is as self-financing as possible, it is proposed to amend the permit pricing proposal as follows:
- 2.22. Residents' permits will rise by five pounds to £30 for the first permit. Second and third permits will cost £50. A maximum of three residents permits will be available per eligible property, as is the case currently. It is proposed to introduce this increase from 6 April 2020 or as soon as the variation to the relevant traffic regulation orders has taken place after this date.
- 2.23. The majority of households in Warwickshire, close to 75%, have one permit only. The proposed pricing scheme therefore limits the price rise for the majority of households to just £5. It also recognises that heavier users of the system and those who take up more carriageway space should pay for doing so and this is borne out by the consultation feedback.
- 2.24. This proposal would therefore see all day all year round on-street parking rise from under **seven** pence per day currently to just over **eight** pence for the vast majority of permit holders who have just one permit.
- 2.25. Thereafter prices are proposed to rise by an amount which considers inflationary pressure.
- 2.26. This approach considers and accommodates much of the feedback we have received during the period of the consultation and spreads the cost of the permit pricing increases over additional years, while addressing the requirement to make the permitting scheme more self-financing.
- 2.27. There was a degree of feedback which indicated that the current system was not value for money since "civil enforcement officers [CEOs] were never seen" and "there was never anywhere to park despite having a permit".
- 2.28. Our CEOs carry out regular patrols of residents parking zones and issue penalty charge notices were necessary. Overall on-street parking compliance within the CPE areas of Warwickshire is at approximately 90%. This figure indicates the success of the current enforcement strategy.

- 2.29. Approximately 43% of Warwickshire's housing stock has little or no off-street parking provision. On-street parking demand is therefore a competition between residents, visitors, commuters, shoppers, tourists, businesses and tradespeople.
- 2.30. In order to manage these competing demands and provide a degree of support to our town centre economies, our residents permit zones are necessarily shared use, with time-limited parking available for general use.

Digital online permitting

- 2.31. The switch to a digital online permitting system was broadly supported both in terms of using it to manage their own permit applications and to control the misuse of visitors permits. 74% of respondents indicated that they would use such a system to manage their own permits, with 49% in agreement that visitor permit misuse should be tackled this way and 36% against.
- 2.32. Comments from respondents emphasised the requirement to provide a responsive and reliable digital permitting system.
- 2.33. Paper based permitting systems are increasingly rare in the marketplace with more and more operations switching over to digital systems. These include vehicle excise duty, tv licensing and passport applications. Last year more rail tickets were used digitally than via traditional paper tickets.
- 2.34. The relative lack of paper based permitting systems on the market will lead to additional costs for Warwickshire CC in sourcing a replacement to the existing system. There is also the question of technical support which is unlikely to be developed further for such systems.
- 2.35. The provision of a digital online process has been identified as a move towards greater efficiency and, because such efficiency requirements have been built into the contract with the service provider, this is cost neutral in procurement terms to the council. This would not be the case with a replacement paper-based permit system.
- 2.36. There was some criticism of the proposal to move to online digital permitting systems from respondents who had no access to the internet. Analysis shows that this was a fairly common comment from elderly respondents. Our approach, as outlined in the consultation documentation, is to provide a phone service to manage the small number of permit holders to whom this applies.
- 2.37. An alternative approach might be for friends or family to manage the account holder's account on their behalf.
- 2.38. It is proposed to introduce the online digital permitting system from the start of the next financial year 2020/21 or as soon as the variation to the relevant traffic regulation orders has taken place after this date.

Proposals - Visitors

- 2.39. The cost of purchasing visitor's parking allowance will rise to £30 per annum. This is an increase of £5 and matches the proposed rise to the resident's permit price.
- 2.40. The increasing scarcity of paper-based permitting systems and the likely additional costs faced by the council in sourcing and implementing a system which will need to be technically supported throughout the lifetime of the contract means that a switch to a digital system for managing visitor's permits is necessary and proposed.
- 2.41. It is intended therefore to manage visitor parking through the online digital permitting system requiring the visitor's registration number to be logged. This is purely so that civil enforcement officers (CEOs) can see, via their handheld devices, which cars are parked legitimately.
- 2.42. The introduction of the online digital permitting system is proposed from the start of the next financial year 2020/21 or as soon as the variation to the relevant traffic regulation orders has taken place after this date. We will retain a phone management service for those without internet access.
- 2.43. Alternatively, family members may wish, with the agreement of the account holder, to manage the service on their relative's behalf. We intend to address any concerns over ease of use with detailed communication before the new system goes live.
- 2.44. There was significant disagreement with the proposal to limit visitor's parking through an annual allowance of hours. Despite this being intended to free up kerbside space for residents and genuine visitors, many respondents did not want to limit visitors in this way, with concerns about fairness and the impact on the elderly and vulnerable being of particular importance.
- 2.45. It is intended, therefore, to remove the proposed restriction on the visitor's annual parking allowance. In this way, the new online management system will effectively mirror the current arrangement. One visitor will be permissible at any one time and their parking will be managed through the registering of the visitor's car registration number.
- 2.46. Further visits from new visitors would be possible by logging their vehicle details once the previous visitor had left – this is no different to the current system of passing on the visitor's permit to a new arrival. The absence of paper permitting does require a system where parked vehicles can be checked digitally.
- 2.47. There was some disquiet about why visitor's vehicle details are required and privacy issues. At no point will the visitor's car registration details be used for any purpose other than allowing CEOs to check that the visitor's vehicle is parked legitimately on-street at any given time.

2.48. The information will be held securely on our service provider's servers in much the same way that existing data for resident's permits is managed.

Proposals - Guesthouse visitors

- 2.49. There was some concern from local residents that guesthouses were able to provide on-street parking for visitors at all. It was highlighted that this entitlement removes kerbside space for residents. Currently, with the exception of guesthouses, businesses are not part of the permit parking scheme.
- 2.50. It is not proposed at the current time to remove guesthouse eligibility from the on-street parking permit scheme.
- 2.51. A small number of guesthouses use the current permit scratchcard scheme and these were contacted as part of the consultation.
- 2.52. The response from guesthouses was broadly critical. There was opposition to the price rise and some questioned how the digital approach would work in practice.
- 2.53. The change to guesthouse permitting is recommended to proceed as advertised. Guesthouse owners will therefore pay £5 for each 24-hour visitor parking session and this will replace the current £3 scratch card arrangement. This represents both a significant saving on all day parking in local off-street car parks and is intended as a help to the local tourist industry.
- 2.54. This is the first rise in guesthouse visitor parking since civil parking enforcement was introduced in Stratford in 2004/5.
- 2.55. Guesthouses will be required to manage their visitors' parking through the new online digital permitting system, and this is intended to be introduced from 6 April 2020 or as soon as the variation to the relevant traffic regulation orders has taken place after this date.

Proposals - Stratford Park and Ride

- 2.56. Some respondents queried the absence of a visible paper permit. This is a concern which is reflected elsewhere, with the criticism centred around not being able to tell if other vehicles are legitimately parked.
- 2.57. The critical aspect is whether or not our CEOs can see if vehicles are parked correctly and then take appropriate action, not whether members of the public can do so.
- 2.58. Users of quarterly and annual season tickets at Stratford Park and Ride will be required to use the online digital permitting system, which will allow them to park on site and board the bus into Stratford.

Proposals - Pay and Display Charges

- 2.59. It is recommended to increase the on-street pay and display charges in line with the proposals contained within the Cabinet report of 11 April 2019.
- 2.60. The small proposed increase to pay and display parking prices will harmonise charges across the county and re-introduce linear charging which will make payment and time-keeping much easier for users. The current pricing plan of 55p per 30 minutes and multiples thereof is awkward and not transparent for customers. The proposal provides welcome clarity.
- 2.61. Our Local Transport Plan (LTP3) states that parking charges should not be used as a competitive tool between towns within Warwickshire and this harmonised approach addresses this, removing the existing price discrepancy between Kenilworth and other towns in Warwickshire.
- 2.62. The proposed prices create a bigger differential between on-street and off-street parking which will help to encourage uptake of parking in district and borough town centre car parks and free up kerbside space. This is in line with our parking policy and LTP3.
- 2.63. The introduction of pay and display charges for short stay on-street parking in parts of Warwickshire has contributed directly to the delivery of a proportionate enforcement response which, in turn, has increased turnover of kerbside space. This has had a beneficial impact on trade within the town, as shoppers vacate kerbside parking places at regular, frequent intervals throughout the day.
- 2.64. In meetings with Leamington BID it was recognised that a closer working relationship was desirable to promote town centre vitality and, subsequent to the consultation, meetings have taken place to explore possible parking solutions and to seek ways in which parking management can assist with town centre economic success.
- 2.65. The proposed increase to pay and display charges should be introduced early in the new financial year 2020/21, once the changes have been duly advertised.

Proposals - Parking dispensations and bay suspensions

- 2.66. It was highlighted in the 11 April Cabinet report that parking dispensations would be put on the same statutory footing as the existing bay suspensions.
- 2.67. It was further proposed that the charges for both bay suspensions and dispensations would be harmonised and amended to £15 per day per bay. This is in line with existing charges nationally and those of neighbouring authorities.

- 2.68. The amendment to the charging scheme for dispensations and suspensions is designed to encourage swifter resolution of on-street works by businesses and a prompt return of the affected parking bays to general parking availability.
- 2.69. At the present time the charges have the unintended consequence of encouraging longer periods of parking space occupancy, rather than acting as an incentive to move on promptly, as should be the case. The changes will promote more efficient working practices and help to free up kerbside space for residents.
- 2.70. It is recommended that these proposals should proceed as per the above Cabinet report.

3.0 Financial Implications

- 3.1 It is anticipated that the switch to digital online permitting will take place within the forthcoming financial year 2020/21. Our service provider, NSL, is funding the procurement of the new permitting system, PermitSmart, as a result of their contractual commitments.
- 3.2 The purchase of a new digital permitting system has been identified as a requirement of the contractual arrangement between NSL and WCC and will incur no additional cost to the Council.
- 3.3 Failure to adopt new digital technology is likely to incur additional financial cost and delay for the council as it would be required to seek, through a tendering process, whether a replacement paper-based permitting system is available.
- 3.4 This is also likely to have impacts on the ability of residents to apply for, renew and pay for permits as the existing paper permit system becomes increasingly obsolete and technically unsupported. The council may be forced to seek temporary replacement processes at additional cost while new systems are sought.
- 3.5 The abandonment of the £35/£55/£80 tiered approach to permit pricing, as consulted upon, will result in a cost to the council in terms of reduced income of £127,425 in the forthcoming year when compared to the current permit pricing structure of £25 per permit.
- 3.6 In comparison to the existing £25 per permit structure, the abandonment of the proposed flat rate permit pricing option of £80 per permit will result in reduced income of £432,575.
- 3.7 The current proposal to raise permit prices from 6 April 2020 or soon thereafter, starting with a £5 rise to £30 for the first resident's permit, and £50 for the second and third permits, will generate an additional £104,375 in the next financial year, when compared with the existing £25 per permit.

- 3.8 Any income arising from civil parking enforcement may only be spent on the management of CPE itself plus highways improvements, public transport and environmental improvement.

4.0 Environmental Implications

- 4.1 Warwickshire CC declared a climate emergency on 25 July 2019. The County's approach is to put environmental issues at the heart of its decision making.
- 4.2 The switch to digital permitting will result in reduced use of paper, as permits and letters will be greatly reduced in number.
- 4.3 On average a private motor car spends 94% of its time parked. It is right that those residents with several cars taking up kerbside space should contribute more to the parking permit system. The proposed pricing scheme which introduces higher permit rates for additional cars may also contribute to a modal shift away from private car use towards public transport.
- 4.4 The proposed Task and Finish Review will consider environmental issues as part of its remit, with a view to encouraging more sustainable forms of transport.

5.0 Timescales associated with the decision and next steps

- 5.1 It is intended to present a report to Cabinet at its March 19 2020 meeting for consideration of the new proposed changes to on-street parking management.
- 5.2 Subject to Cabinet approval, work to vary the relevant traffic regulation orders to implement the agreed on-street parking changes will start immediately following the decision at Cabinet.
- 5.3 The variations will formalise the permit price changes, the switch to digital permitting and the regulation of suspensions and dispensations.
- 5.4 It is intended that these changes will be in place from 6 April 2020 or as soon as the variation to the relevant traffic regulation orders has taken place after this date.
- 5.5 The proposed increase and harmonisation of pay and display charges across Warwickshire will, subject to Cabinet approval, be implemented following advertisement by Notice on or after 6 April 2020.
- 5.6 In response to the climate emergency unanimously declared at Warwickshire County Council, work will start to consider possible future amendments to the permit scheme which favour low emission vehicles and other environmental benefits.

- 5.7 There has been some demand from local businesses for parking permits. Warwickshire’s Vision includes a commitment towards a vibrant economy, including the drive to make the County an attractive place to do business, with a strong local economy and infrastructure.
- 5.8 In light of the above considerations and the requirement to address town centre transport issues, including parking, it is further proposed to establish a short-term Task and Finish Review to consider wider issues which will benefit Warwickshire’s residents, businesses and the environment.

Appendices

Appendix A - Parking consultation analysis report – WCC Insight team

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