

<b>CORPORATE FINANCE AND PERFORMANCE SCRUTINY PANEL</b>	<b>DATE</b> 07 May 2024	<b>ITEM NO</b> 6
<b>TITLE</b> Street Enforcement/ Kerbside Strategy	<b>WARD (S)</b> ALL	
<b>CHIEF OFFICER</b> Director of Communities, Environment and Central	<b>CABINET MEMBER</b> Deputy Leader of the Council and Cabinet Member for Climate Change, Environment & Transport	
<b>DECISION CLASSIFICATION</b> Non Key Non-exempt	<b>IS THE FINAL DECISION ON THE RECOMMENDATIONS IN THIS REPORT TO BE MADE AT THIS MEETING?</b> Yes	

1. **Decision required**

This report makes the following recommendations to the decision-maker:

- 1.1 To note this update on activity as it related to the council's powers as they relate to its status as an Enforcement Authority

2. **Links to Our Greenwich missions**

- 2.1 This report relates to the Council's agreed missions as follows:

- People's health supports them in living their best life
- People will not experience discrimination
- Those in financial need can access the right support, advice and opportunities to improve their situation
- Children and young people can reach their full potential
- Everyone in Greenwich is safer, and feels safer
- People in Greenwich have access to a safe and secure home that meets their needs
- It is easier, safer and greener to move around the borough and the rest of London
- Development delivers positive change to an area for existing and new communities
- Neighbourhoods are vibrant, safe and attractive with community services that meet the needs of local residents

- Greenwich plays an active role in tackling the climate crisis and improving environmental sustainability, in line with our commitment of being carbon neutral by 2030
- Everyone has the opportunity to secure a good job
- Town centres, high streets and shopping parades are vibrant, prosperous, well-maintained places that meet the needs of local people
- Our economy attracts new high value businesses whilst strengthening its foundations
- The voluntary, community and socially motivated sectors in Greenwich are strengthened and able to provide more support to the most in need
- Our Council is better at listening to communities, and communities feel they are heard
- We develop networks with communities, key partners and businesses to meet need and address challenges together
- We design our services around the needs of our residents
- Our Council is an adaptive organisation, enabling it to navigate the increasing number of challenges it faces while remaining financially sustainable
- Our Council works in the most efficient and effective ways possible
- Our Council is a great place to work, with a diverse workforce who have the right skills and are motivated and empowered to deliver

### **3. Purpose of Report and Executive Summary**

- 3.1 The report provides an overview of Parking and Traffic enforcement activity and insight into a historic £10m adverse budget position which was specifically requested by the committee at Corporate Finance and Scrutiny Panel on 30<sup>th</sup> November 2022.
- 3.2 The Corporate Finance and Performance Scrutiny Panel initially considered an item on budget performance on 30 November 2022. This looked at how the Council manages both revenue and capital budgets and used and Transportation (Revenue)
- 3.3 Members requested a briefing to clarify the figures presented in the tables of the Supplementary Report, with particular emphasis on:
- CCTV PCNs £7m in 2021/22 and projected £10m in 2022/23

- £9.9m projected variance as a Pd 6 in 2022/23, including breakdown of each entry and assumptions that led to those figures.  
Clarification on what each of the following areas delivered:
- Transportation Management, Transportation Strategy, Traffic Management and Parking Management & Off-Street Costs.
- A separate breakdown of the 'Covid Adjustment' element, explaining what funds were received the Council with the purpose of funding the Transport Strategy. Officers are unable to provide this detail and therefore it was removed from the scope.
- Subsequently there has been a further request for officers to include the following within the report:
  - a) A narrative on the rationale for the ~£10mil revenue expected from enforcement activities; what metrics were used to reach this number, are there past indicators etc. *Following a review of this ask, officers have provided an outline of the build up of the PID assumptions in section 9 of the report.*
  - b) A breakdown of each camera location and PCNs issued due to that camera for the last 5 years (if available) vs projections for that camera (if possible). *In response to this request, officers have provided a snapshot of the current sites in the borough and the totality of the PCNs issued. A full review of the full CCTV estate is being conducted and will be reported back via the councils Financial Management Board, until such time it would not be possible to share this information but the last 12 months is included as Appendix F1.*
  - c) Number of reports of illegal parking and how many of these resulted in a PCN. *In response to this query, officers can confirm that the council receives numerous reports of illegal parking, through various channels and reporting of this and records of how this has resulted in enforcement has not been specifically recorded. The service receives circa 1,400 public / 250 Member contacts per year.*
  - d) Numbers of in house wardens vs agency and average number of PCN's per warden (average for in house and average for agency)

	Employed Total	PCNs Projection	Hours At Cost Projection*	PCN/Hour
<i>Permanent CEO</i>	8	22542	15561	1.26
<i>Agency CEO</i>	16	40677	21772	1.62
<i>Total CEO</i>	24	63219	37333	1.47

\*This includes sickness absences charged to the LA above SSP based on whole year of run rate April 2023 to mid February 2024 plus the RBG annual leave entitlement above the statutory minimum (20 days)

- e) How many PCN/FPN are challenged, how many do we defend and how many of these do we win/lose (numbers and percentages) – included in Section 5 and Section 8 of the report.
- f) What do officers feel are the reasons for failing to meet expected revenue/strategies to improve performance to meet expected revenue – *officers have outlined as linked to point a) the details within Section 6 of the report.*

#### **4. Introduction and Background**

- 4.1 The Transport division was moved from the Directorate of Enterprise and Skills (DRES) to the Directorate of Communities, Environment and Central February 2022.

The initial scoping identified a 3-stage plan to mobilise Transformation of the service and was set out below.

- 4.2 Transformational Plan: 1) Stabilise 2) Deliver 3) Excel

##### **1. Stabilisation Phase:**

- a) Mapping current issues and challenges
- b) Building capacity
- c) Building capability
- d) Mapping of the overall system - relevant internal and external policies and strategies
- e) Develop plans for policy framework.
- f) Secure contracts
- g) Safety of assets
- h) Boosting staff morale
- i) Permanent location of division confirmed.

##### **4.3 2. Delivery Phase**

- a) Establishing delivery approach:
- b) Policy, Resources and Staff
- c) Development of programmatic approach to management of schemes

- d) Utilisation and support from the changing capacity of the organisation (Digital, HR, CI, etc.)
- e) Launch Re-organisation
- f) Accountable Leadership and Cultural change
- g) Delivery of scheme and projects
- h) Systematic approach to the division
- i) Vision: be among the best in London

#### **4.4 3. Excel - August 23- ongoing includes:**

- a) Pushing the division and services to the top levels of performance
- b) Recognition through industry awards

4.5 The rationale for progressing this reorganisation is broadly set out above but other reasons why we are doing it include:

##### LIP funding

- 4.6 Transport for London (TfL) funding has been very sparse and limited since covid, following Streetspace funding packages being released. We are now seeing a drop from circa £5m to £1.5m with extra funding in places such as Greenwich Town Centre to £2.1m which is impacting on budget and fees.
- 4.7 TfL's reduced funding has impacted the overall funding opportunity for programme delivery, and in turn this has impacted the amount of funding available to meet budget expectations for resource. This has resulted in the deletion of some posts directly funded by this programme.
- 4.8 It has also resulted in a reduced dependency and delivery programme which has therefore actioned a change of delivery model, to align with the capital delivery of outputs of the Transport Strategy and Carbon Neutral Plan.
- 4.9 **Transport Strategy**  
The adoption of the Transport Strategy in 2022 and associated plans has put more focus and pressure on the Transport service, with a number of capital bids being submitted for further delivery of the actions derived from this. This has enabled a Capital Projects delivery team to be created which will provide more accountability and focus, using a Project Management approach to delivery.

Adoption of the Strategy and associated Framework Policy Action Plans has given strategic direction and prioritisation around what we do and how we do it.

#### 4.10 Carbon Neutral Plan

Transport is the second biggest source of emissions in Royal Greenwich, after buildings. We need to reduce the need to travel and make public transport, walking, and cycling the first choice and support the roll-out of ultra-low emission vehicles.

Alongside the Transport Strategy there are various outputs of the Transport Strategy which link with the Medium-Term Financial Strategy. There are a number of huge challenges and variables that make this budget setting more complex than usual, and a change in any direction could cause significant issues for our finances and the way we run our services.

Transport is tasked with meeting significant savings and is also tasked with meeting budget expectations over the coming years.

4.11 Enforcement of Parking and Traffic offences by Local Authorities in its current form dates back to The Road Traffic Act 1991, which provided for the decriminalisation of certain non-enforceable parking offences in London and allowed Local Authorities outside London to apply to the Secretary of State for similar powers. The cascade of powers inside London was mandatory and London Local Authorities had choice in adopting powers and responsibility that went with them.

4.12 The initial set contraventions transferred to Local Authorities mainly include parking offences on yellow lines and in parking spaces. It did not include enforceable offences and offences related to obstruction which the police retained and still do to this day. In simple terms the transfer of powers related to offences of fact rather than opinion.

4.13 The primary tool made available for enforcement was the Penalty Charge Notice which could be issued by the Local Authority in instances of non-compliance with the prevailing regulations.

4.14 That initial transfer of powers saw the roll out of the first wave of Controlled Parking Zones in London during 1994/95, initially in the more central boroughs, which has steadily expanded to the outer boroughs

year on year. At this point every London Borough operates Controlled Parking Zones (CPZs) with the more central boroughs at or approaching CPZ 100% coverage and the outer boroughs gradually heading in that general direction. Greenwich currently has coverage of approximately 35%.

- 4.15 The further cascades of powers has continued with the key decriminalised workstreams for Local Authorities in London currently being:
- Parking
  - Bus Lanes
  - Moving Traffic
- 4.16 Transport for London and London Councils also issue Penalty Charge Notices for other workstreams such as London Lorry Control Scheme, ULEZ and the Congestion Zone.
- 4.17 There have been numerous updates to the legislation since 1991 with one of the most notable being the introduction of the Traffic Management Act 2004 (introduced in 2008) which remains to date the central piece of legislation governing Civil Enforcement activity and the issue of Penalty Charge Notices.
- 4.18 The Traffic Management Act 2004 introduced the term 'civil parking enforcement' rather than 'decriminalised parking enforcement' although the two are often used interchangeably. It also saw the rebranding of Parking Attendants to Civil Enforcement Officers.
- 4.19 As part of the introduction of the Traffic Management Act 2004, the Department for Transport published binding guidance which Local Authorities must comply with. Section 87 of the TMA 2004 stipulates that local authorities must have regard to this statutory guidance when developing, implementing and reviewing their regimes; and in exercising their functions in connection with the associated enforcement activity, local authorities are expected to follow the guidance unless there is a compelling reason for not doing so.
- 4.20 The Department for Transport used this opportunity to re-enforce that Enforcement authorities should aim to increase compliance with parking restrictions through clear, well-designed, legal and enforced parking

controls. Enforcement authorities should not view it in isolation or as a way of raising revenue.

- 4.21 The binding guidance published by the Department for Transport, specifically stated that “raising revenue should not be an objective of civil parking enforcement, nor should authorities set targets for revenue or the number of Penalty Charge Notices (PCNs) they issue.”
- 4.23 In respect to the consideration of Penalty Charge Notices issued, the Department for Transport through its statutory guidance also provided that “elected members and unauthorised staff should not, under any circumstances, play a part in deciding the outcome of individual challenges or representations”.
- 4.24 The income from on-street charging and any penalty charge payments received (whether for on-street or off-street enforcement) must only be used in accordance with section 55 (as amended) of the Road Traffic Regulation Act 1984, which in simple terms limit its use to transport related activities. In Greenwich the primary use of any surplus is to offset the annual Concessionary Fares bill.
- 4.25 In general terms the TMA 2004 sets out that Enforcement authorities should design their parking policies with particular regard to:
- a) managing the traffic network to ensure expeditious movement of traffic, (including pedestrians and cyclists), as required under section 16 of the TMA, Network Management Duty
  - b) improving road safety
  - c) improving the local environment
  - d) improving the quality and accessibility of public transport
  - e) meeting the needs of people with disabilities, some of whom will be unable to use public transport and depend entirely on the use of a car
  - f) managing and reconciling the competing demands for kerb space
- Within Greenwich this has manifested itself in the recently adopted Transport Strategy and associated Kerbside Management Policy Framework Action Plan.



## 5. PCN Issuance

5.1 The following tables break down the PCN issuance over recent years by month and key workstream.

	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Total
Bus Lane	1635	2372	2461	3771	2502	1734	1785	2103	1895	2303			22561
Moving Traffic	1828	2626	3000	3041	3313	1938	2283	2757	2459	2130			25375
CCTV Parking	494	474	435	847	1175	848	892	927	788	1120			8000
CEO Parking	5363	5760	5399	5354	5267	5344	5477	4984	4517	5185			52650
<b>Total</b>	<b>9320</b>	<b>11232</b>	<b>11295</b>	<b>13013</b>	<b>12257</b>	<b>9864</b>	<b>10437</b>	<b>10771</b>	<b>9659</b>	<b>10738</b>		<b>0</b>	<b>108586</b>

  

2022/23	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Jan-23	Feb-23	Mar-23	Total
Bus Lane	1,409	1,811	1,969	1,846	1,967	1,577	3,096	2,338	2,228	5,396	1,717	2,307	27,661
Moving Traffic	867	1,386	2,963	2,296	2,715	3,705	4,832	4,075	3,660	3,884	2,568	3,026	35,977
Parking CEO	5,539	5,813	5,821	5,820	5,388	4,698	5,534	4,833	4,326	4,995	5,183	5,059	63,009
Parking CCTV	430	406	1,046	1,070	599	395	368	297	381	1,226	766	1,013	7,996
<b>Total</b>	<b>8,245</b>	<b>9,416</b>	<b>11,798</b>	<b>11,032</b>	<b>10,669</b>	<b>10,375</b>	<b>13,830</b>	<b>11,543</b>	<b>10,595</b>	<b>15,501</b>	<b>10,234</b>	<b>11,405</b>	<b>134,643</b>

  

2021/22	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Total
Bus Lane	715	738	658	942	1,141	899	993	620	415	562	404	371	8,458
Moving Traffic	1,257	879	827	2,895	4,969	8,002	7,314	3,677	2,368	3,118	2,507	1,853	39,666
Parking CEO	5,131	6,082	5,470	4,486	5,153	4,921	5,611	5,684	4,899	5,144	5,055	5,488	63,124
Parking CCTV	1,607	2,117	1,311	2,151	1,924	1,395	801	639	703	1,286	550	623	15,107
<b>Total</b>	<b>8,710</b>	<b>9,816</b>	<b>8,266</b>	<b>10,474</b>	<b>13,187</b>	<b>15,217</b>	<b>14,719</b>	<b>10,620</b>	<b>8,385</b>	<b>10,110</b>	<b>8,516</b>	<b>8,335</b>	<b>126,355</b>

5.2 In 2020/21 the total number of PCNs issued was 58,839 which included 3,162 Bus Lane and 4,118 Moving Traffic PCNs

5.3 The overall growth in PCN volumes since 2020/21 is predominantly driven by the expansion of MTC CCTV network and currently almost 60% of PCNs are now issued via CCTV.

5.4 The expectation for 2023/24 is that we issue approximately 140,000 PCNs although it is noted that since ULEZ went live (end of August 2023) that the Bus Lane and Moving Traffic PCN volumes have dropped by approximately 2,000 PCNs per month, which if it was to continue may impact the final year end position.

5.5 The table below lists the Top Twenty Locations in the borough for PCN issuance for the most recent 12-month reporting period. Nineteen of the twenty locations are driven by CCTV with Plumstead High Street at sixteen being the exception. Note the total data set population is 137,786 PCNs

Count	Location	PCN Count	Source
1	WOOLWICH ROAD NE BOUND, OPP CHARLTON LANE (144746)	6,108	Bus Lane
2	PLUMSTEAD COMMON ROAD	4,904	Box Junction
3	BLACKWALL LANE STH O/S DYSON HOUSE (145185)	4,793	Bus Lane
4	PEARTREE WAY	4,509	Box Junction
5	BUGSBY WAY - W/B OUTSIDE MAKRO (144678)	4,210	Bus Lane
6	TUNNEL AVENUE	3,782	Prohibition on vehicle type
7	PLUMSTEAD HIGH STREET J/W GARIBALDI STREET	3,755	Box Junction
8	WOOLWICH ROAD SW BOUND, MARYON PARK (147733)	3,708	Bus Lane
9	BLACKWALL LANE JUNCTION WITH SALUTATION ROAD	3,634	Box Junction
10	CHARLTON CHURCH LANE JNC WITH BARNEY CLOSE (144684)	3,450	Bus Lane
11	ROMNEY ROAD - WEIGHT-R	2,812	Weight Restriction
12	ROCHESTER WAY (BUS GATE)	2,673	Prohibition on vehicle type
13	SPRAY STREET JNC WITH TAYLOR'S BUILDINGS (144636)	2,178	No Entry
14	CENTRAL WAY O/S LINTON MEAD (144720)	1,969	Bus Lane
15	MILLENNIUM WAY BUS STOP	1,924	Bus Stop
16	PLUMSTEAD HIGH STREET	1,924	Mixed CEO
17	KIDBROOKE PARK ROAD BUS GATE NB	1,869	Bus Lane
18	A206 VICTORY PARADE O/S NAVAL HOUSE (145046)	1,838	Bus Stop
19	A206 BERESFORD ST / BERESFORD SQUARE (145075)	1,714	Bus Stop
20	PLUMSTEAD ROAD, EASTERN BUS LANE - SE18 7DN	1,699	Bus Lane

## 5.6 The same data set can be displayed by Top Twenty Offence Code

Count	Offence	Volume
1	34J - VEHICLE SEEN CONTRAVENING BUS LANE REG	31,788
2	31J - Stopping on a box junction	18,863
3	12S - Parked in a residents' or shared use parking	14,221
4	01 - PARKED IN A RESTRICTED STREET	12,990
5	52J - Prohibition on vehicle type	9,126
6	47J- PARKED ON A RESTRICTED BUS STOP/STAND	8,039
7	06P - PARKED WITHOUT CLEARLY DISPLAYING VALID P&D	4,515
8	83 - PARKED WITHOUT CLEARLY DISPLAYING P&D	4,500
9	85-IN A PERMIT AREA WITHOUT A PERMIT	3,695
10	30 - PARKED FOR LONGER THAN PERMITTED	3,072
11	624 - ONE OR MORE WHEELS ON URBAN ROAD (ALL WHEEL)	2,251
12	51J - No Entry	2,247
13	12R - Parked in a residents' bay	1,915
14	02 - (UN)LOADING DURING PROHIBITED HOURS	1,575
15	52M - Prohibition on vehicle type (motor vehicles)	1,343
16	25 - PARKED IN A LOADING PLACE	1,262
17	32J - Ignore Blue Sign Arrow (turning wrong way)	1,243
18	622 - ONE OR MORE WHEELS ON URBAN ROAD (PARTLY ON)	1,212
19	50J - Performing a prohibited turn	1,198
20	30F - PARKED FOR LONGER THAN PERMITTED	949

Enforcing Authority	Higher Level Parking PCNs	Lower Level Parking PCNs	Total Parking PCNs	Bus lane PCNs	Moving Traffic PCNs	London Lorry Control Scheme (Operators)	London Lorry Control Scheme (Drivers)	Total PCNs	London Lorry Control Scheme (Observations)	Total Vehicles clamped	Vehicles removed to pound
Lambeth	137,507	16,705	154,212	43,602	157,018			354,832			92
Greenwich	53,747	18,029	71,776	29,152	35,656			136,584			
Ealing	65,647	16,481	82,128	28,914	112,520			223,562			22
Barking & Dagenham	69,144	17,397	86,541	21,312	108,406			216,259			542
Barnet	87,528	22,813	110,341	20,192	73,855			204,388			115
Transport for London	440,227		440,227	16,273	330,734			787,234			
Waltham Forest	105,022	16,457	121,479	15,924	144,926			282,329			3,296
Haringey	153,285	29,159	182,444	15,173	187,078			384,695			3,785
Hammersmith & Fulham	90,584	24,402	114,986	13,776	202,969			331,731			794
Enfield	49,127	13,200	62,327	11,662	76,609			150,598			984
Newham	155,735	19,704	175,439	11,468	130,645			317,552			8,117
Havering	62,984	39,027	102,011	10,812	41,788			154,611			
Bromley	41,315	30,709	72,024	10,590	30,460			113,074			
Kingston	46,711	26,043	72,754	9,190	41,779			123,723			
Brent	98,899	20,262	119,161	8,267	52,745			180,173			2,395
Southwark	74,207	13,762	87,969	8,220	100,096			196,285			63
Harrow	67,932	24,115	92,047	7,530	59,484			159,061			
Merton	48,986	31,142	80,128	6,663	64,007			150,798			

## 6. Budget Proposals

6.1 In February 2020, Council agreed the MTFs for the forthcoming period, with part of that report explaining the Continuous Improvement Model that the council was adopting, including one strand on income optimisation. Importantly, this strand dealt with optimising income rather than a pursuit of maximising income, recognising the fact that maximising income can sometimes have adverse / unintended consequences and there are some areas where income will be generated as a result of decisions made primarily for non financial reasons. The latter point is important in the context of parking, whereby decisions which ultimately raise income should be undertaken for service related reasons and not generate pure income. It is also worth clarifying what is meant by a “surplus”.

### 6.2 Parking Surplus

If the actual gross income from parking exceeds actual gross expenditure, then a “parking surplus” is generated.

### 6.3 MTFs Surplus

For the MTFs, we budget for the gross expenditure and also for the gross income. If we actually spend less than we budgeted or actually achieve more income than budgeted, then we have “MTFS surplus”. Conversely, if we actually spend more than we budgeted or actually achieve less income than budgeted, then we have “MTFS deficit”.

## 6.4 Benchmarking

During the run up to the 2021/22 budget process, benchmarking across a number of council services was undertaken using a tool that drew its data from that provided by all councils and published by the government for 2018/19 (at that point, the latest available). Under transport, Greenwich was ranked 30/33 lowest for income per head.

Appendix B shows a map of the London Boroughs heat mapped and ranked. The map therefore gave rise to more detailed benchmarking analysis.

6.6 Transport income is largely derived through parking and related activity, so the more detailed analysis concentrated on this area, again using the same datasets as before, but focussing upon “on street parking” and “off street parking”. The analysis also included data relating to statutory concessionary fares – in London this is the Freedom Pass, with boroughs levied a charge based upon the last three years usage. The reason for including this is that actual net parking income arising is ploughed back into transport related activities, of which statutory concessionary fares is recognised as one of those related activities.

From the additional work, Table 9.1 (source: Appendix C) below shows a summary of the rankings by each element analysed.

*Table 9.1 – London Borough Parking Rankings for cost and income (2018/19)*

<b>Appendix</b>	<b>Description</b>	<b>Ranking (out of 33)</b>
C1	gross income from on and off street parking	28
C2	net income from on and off street parking	30
C3	net income from on and off street parking and after concessionary fares	30
C4	gross income to gross expenditure ratio	29

The data showed the Greenwich appeared to be an outlier when ranked purely by cost and income across a number of sub headings within parking. The data was made available to the service so that it could review, amalgamate with performance data and determine what actions, if any, were needed.

## 6.7 Service Proposals

Over the course of several months, the service undertook a review and determined there were several key factors at play. The most significant factor was that the council had only received authority to commence enforcing Moving Traffic Contraventions (MTCs) during 2020 and rollout of the first batch of cameras was underway, with the first sites going live in the Summer of 2020. The service was also in the early stages of developing a Parking & Kerbside Management Strategy (linked to the Carbon Neutral Plan and LIP funding), incorporating further rollout of the use of Controlled Parking Zones and thus additional permits and potential PCNs were all within scope.

The service developed four initiatives, which were incorporated into the budget setting process:

- 1) Controlled Parking Zones (CPZs)
- 2) Permits
- 3) Pay and Display (P&D)
- 4) Moving Traffic Contraventions (MTCs)

The proposals were substantial in value and are shown in Table 9.2 (Appendix D).

*Table 9.2 – Parking proposals for 2021/22 budget / MTFS (£000)*

Ref	Name	21/22	22/23	23/24	24/25
1	CPZ	350	1,000	2,100	2,100
2	Permits	700	1,330	2,000	2,800
3	P&D	565	1,200	1,700	1,700
<b>Sub total</b>		<b>1,615</b>	<b>3,530</b>	<b>5,800</b>	<b>6,600</b>
4	MTCs	7,035	10,000	10,000	10,000
<b>Total</b>		<b>8,650</b>	<b>13,530</b>	<b>15,800</b>	<b>16,600</b>

As such they were subject to challenge and refinement prior to the MTFS being approved by Council in February 2021, to ensure that the total impact upon the MTFS was deliverable. The review showed that the detailed analysis generated £0.250m more than the original proposals which had been published, but acknowledged risks:

### CPZ (£43k greater than originally drafted proposal)

- a) 7% inflationary rise on other on street permits (£78k)
- b) PCN income from two new small zones (£104k)
- c) PCN income from three new larger zones for six months (£211k)

Permits (£202k less than originally drafted proposal)

- a) 7% inflationary rise on existing resident permits (£38k)
- b) 7% inflationary rise for off street permits (£31k)
- c) permit income from 2 new zones in current year 20/21 (£107k)
- d) permit income from 3 new zones in new year 21/22 (£161k)
- e) permit income from 2 new zones in current year 20/21 non residents (£92k)
- f) permit income from 3 new zones in new year 21/22 (£69k)

P&D (£62k greater than originally drafted)

- a) 7% inflationary rise (£186k)
- b) increased P&D for new zones (£141k)
- c) PCN income increase due to rebanding (£300k)

MTCs (£347k greater than originally drafted)

- a) 20 cameras (nos 21-40) 12 months (£4,218k)
- b) 20 cameras (nos 41-60) 9 months (£3,164k)

## **6.8 Risk**

Whilst some of the new zones were provisionally identified, a number of risk elements were quantified, such as:

- i) reliance on tiered permits 2/3 - £328k
- ii) reliance on price increase 2/3 - £192k

However, there were a number of other variables, with some such as implementation, common to each proposal. Others such as error in the calculation of the variable or that actual experience would differ materially from the expectation were also valid. For MTCs, using the departments site list, a combination of internal staff observation (limited time period) and using a professional company (two days) enabled an average estimated number of tickets to be calculated.

Some implementation costs had been calculated as discrete figures and could be met from reserves whilst others such as running costs were baked into the variables.

There was, however, a significant factor which could help mitigate against many of these risks which was the first 20 MTC sites. The 2020/21 original batch of 20 cameras was not budgeted for (the proposal was to widen the coverage

with two extra phases of 20 cameras each so that there would be 60 in total) i.e. income from this batch was not included in the MTFS.

### Summary

The detailed analysis had shown there was the potential for more income than had been put into the MTFS, but there were risks which could see a significant underachievement, however, the existence of the first batch of 20 cameras could provide overall mitigation. The MTFS report therefore proceeded.

It is also worth noting that the proposals were put forward:

- without reference to any LTNs being created
- before emissions based charging came in.

Therefore, any net income arising from those schemes was not factored into the budgeted income.

### **2022/23**

We now have the same datasets available for 2022/23 as those presented in Table 9.1 above.

They show that gross income has risen from £9.4m in 2018/19 (which is two years before the proposals were being worked up) to £12.3m in 2022/23.

Table 9.3 updates the rankings for the headings analysed previously to track changes over the four year period. Detailed rankings can be found at Appendix E.

*Table 9.3 - London Borough Parking Rankings for cost and income (2018/19 v 2022/23)*

Appendix	Description	Ranking (out of 33)	
		22/23	18/19
E1	gross income from on and off street parking	26	28
E2	net income from on and off street parking	26	30
E3	net income from on and off street parking and after concessionary fares	23	30
E4	gross income to gross expenditure ratio	15	29

It became evident that with actual income not keeping up with budgeted income and to allow time for the service to reorganise and determine what a potentially revised realistic income position should look like, whilst acknowledging the substantial pressures that the council finds itself under more widely, measures were needed to delay the rises in income budget, so as not to destabilise the MTFS.

Whilst the value of the proposals in Table 9.2 increases each year until 2024/25, the MTFS for the final two years, through decisions at Council in February 2023 and March 2024, has provided a mechanism for the annual increase to be effectively “deferred” for a year, by using temporary reductions in the concessionary fares levy e.g. for 2023/24 the budgeted increase in income of £2.270m is offset by the levy reduction of £2.314m – the revenue monitor shows these sums together and reports a net total for transport. When it comes to 2024/25, the £2.314m concessionary fare reduction is no longer available. The budgeted sum has increased further by another £0.800m, however, for 2024/25 there is £0.756m available from the reduced levy for the year, so the 2024/25 additional income sum is also deferred for a year. The two key effects of this are:

- a) the budgeted income for 2023/24 is actually slightly less than the previous year
- b) the total budgeted income of £16.600m originally due from 2024/25 has thus moved a year to 2025/26.

For 2023/24 and 2024/25 the smoothing of additional income each year through the MTFS is shown in Tables 9.4a and 9.4b.

*Table 9.4a – Annual impact of smoothing*

<b>Description</b>	<b>21/22</b>	<b>22/23</b>	<b>23/24</b>	<b>24/25</b>	<b>25/26</b>
Annual increase to income (from proposals – Table 9.2)	8,650	4,880	2,270	800	0
MTFS one off in year support to transport income funded from temporary reduction in concessionary fares			(2,314)	(756)	0
Catch up from the previous year				2,270	800
<b>Net additional / (reduction) in annual budgeted income the MTFS is expecting</b>	<b>8,650</b>	<b>4,880</b>	<b>(44)</b>	<b>2,314</b>	<b>800</b>



Table 9.4b – Overall impact of smoothing

<b>Description</b>	<b>21/22</b>	<b>22/23</b>	<b>23/24</b>	<b>24/25</b>	<b>25/26</b>
Annual income budget (from proposals)	8,650	13,530	15,800	16,600	16,600
MTFS one off in year support to transport income funded from temporary reduction in concessionary fares			(2,314)	(756)	0
<b>Net income the MTFS is expecting</b>	<b>8,650</b>	<b>13,530</b>	<b>13,486</b>	<b>15,844</b>	<b>16,600</b>

The tables above provide for the delay in the budget rises, however, actual income is still vastly below budget. Temporarily, the council is using an underspend on Treasury Management to help offset the transport shortfall. This time needs to be used effectively to resolve what is realistic for the transport service going forward.

## 7. Revenue / Budget Expectations

7.1 The table below summarises the actual income since 2019/20 with budget for 2023/24.

<b>Parking Income 2023-24</b>	<b>2019-20 Totals</b>	<b>2020-21 Totals</b>	<b>2021-22 Totals</b>	<b>2022-23 Totals</b>	<b>Income Budget 2023-24</b>
*CCTV PCNs	0	827,766	3,361,241	3,852,678	4,077,000
CEO PCNs On Street	2,775,173	1,733,714	2,772,951	2,660,516	2,773,750
CEO PCNs Off Street	131,008	74,180	159,960	202,504	199,990
<b>Total</b>	<b>2,906,181</b>	<b>1,807,894</b>	<b>2,932,911</b>	<b>2,863,020</b>	<b>2,973,740</b>
Permits On Street	1,666,235	1,292,660	1,497,565	1,702,538	2,459,610
Permits Off Street	448,073	363,645	417,073	474,102	420,910
<b>Total</b>	<b>2,114,308</b>	<b>1,656,305</b>	<b>1,914,638</b>	<b>2,176,640</b>	<b>2,880,520</b>
Paid for Parking On Street	1,370,158	842,546	1,359,346	1,400,640	1,774,680
Paid for Parking Off Street	1,291,751	664,482	1,165,304	1,304,105	1,587,400
<b>Total</b>	<b>2,661,909</b>	<b>1,507,028</b>	<b>2,524,650</b>	<b>2,704,745</b>	<b>3,362,080</b>
Other	544,534	443,387	605,422	671,388	570,000
MTFS Unallocated Savings					10,147,910
<b>Total</b>	<b>8,226,932</b>	<b>6,242,380</b>	<b>11,338,862</b>	<b>12,268,471</b>	<b>24,011,250</b>

The growth in income is consistent with the growth of PCN issuance with 54% of income raised from enforcement in 2022/23. This has risen from 35% in 2019/20.

## 7.2 The in-year position is set out in the table below.

<b>Parking Income 2023-24</b>									
	<b>April</b>	<b>May</b>	<b>June</b>	<b>July</b>	<b>August</b>	<b>September</b>	<b>October</b>	<b>November</b>	<b>December</b>
*CCTV PCNs	260,920	286,039	276,221	252,434	322,165	322,896	295,827	290,386	246,327
CEO PCNs On Street	203,592	214,754	211,018	224,380	201,998	210,429	231,253	209,737	175,341
CEO PCNs Off Street	14,733	19,451	17,564	20,980	17,891	17,843	20,895	19,553	14,833
<b>Total</b>	<b>218,325</b>	<b>234,205</b>	<b>228,582</b>	<b>245,360</b>	<b>219,889</b>	<b>228,272</b>	<b>252,148</b>	<b>229,290</b>	<b>190,174</b>
Permits On Street	120,489	131,921	129,772	138,998	206,144	235,990	210,057	157,969	128,458
Permits Off Street	12,821	31,632	14,042	12,088	10,325	42,618	19,245	8,086	12,427
<b>Total</b>	<b>133,310</b>	<b>163,553</b>	<b>143,814</b>	<b>151,086</b>	<b>216,469</b>	<b>278,608</b>	<b>229,302</b>	<b>166,055</b>	<b>140,885</b>
Paid for Parking On Street	120,899	128,004	127,610	137,363	158,143	165,328	174,892	156,580	158,518
Paid for Parking Off Street	96,810	110,099	105,014	125,670	132,466	122,221	135,761	113,022	141,823
<b>Total</b>	<b>217,709</b>	<b>238,103</b>	<b>232,624</b>	<b>263,033</b>	<b>290,609</b>	<b>287,549</b>	<b>310,653</b>	<b>269,602</b>	<b>300,341</b>
Other	29,766	46,338	38,096	53,309	45,272	32,605	34,357	124,326	8,389
<b>Total</b>	<b>860,030</b>	<b>968,238</b>	<b>919,337</b>	<b>965,222</b>	<b>1,094,404</b>	<b>1,149,930</b>	<b>1,122,287</b>	<b>1,079,659</b>	<b>886,116</b>

An uplift was observed from August onwards across both Permit and Paid for Parking lines following the introduction of Emission Based Parking. The downturn Bus Lane and Moving Traffic offences observed since the introduction of ULEZ in August 2023, is now manifesting itself in the CCTV PCN income line. It is worth noting there is a lag between the occurrence of a contravention and payments showing in the financial system which explained the relatively strong ledger performance in September even though actual Bus Lane and Moving Traffic contravention levels had already dropped.

## 7.3 Overall at the end of Q2 2023/24 the account was showing an adverse pressure of £876k.

Parking Income 2023-24	Income Budget 2023-24	Income to date 2023-24	Projected Income 2023-24	Projected Variance 2023- 24
CCTV PCNs	4,077,000	2,016,502	3,800,000	277,000
CEO PCNs On Street	2,773,750	1,497,424	2,469,990	303,760
CEO PCNs Off Street	199,990	129,357	205,075	(5,085)
<b>Total</b>	<b>2,973,740</b>	<b>1,626,781</b>	<b>2,675,065</b>	<b>298,675</b>
Permits On Street	2,459,610	1,173,371	2,203,942	255,668
Permits Off Street	420,910	142,771	484,454	(63,544)
<b>Total</b>	<b>2,880,520</b>	<b>1,316,142</b>	<b>2,688,396</b>	<b>192,124</b>
Paid for Parking On Street	1,774,680	1,012,239	1,741,966	32,714
Paid for Parking Off Street	1,587,400	828,041	1,516,847	70,553
<b>Total</b>	<b>3,362,080</b>	<b>1,840,280</b>	<b>3,258,813</b>	<b>103,267</b>
Other	570,000	279,743	564,478	5,522
<b>Total</b>	<b>13,863,340</b>	<b>7,079,448</b>	<b>12,986,752</b>	<b>876,588</b>

7.4 Should Bus Lane and Moving Traffic workstreams stabilise it is likely that the current budget position will close as the Permit & Paid for Parking lines are performing strongly.

## 8. Recovery rates

8.1 The table below sets out the current 12 Month Rolling Recovery Rate for all PCNs. The table below sets out the current 12 Month Rolling Recovery Rate for all PCNs. When considering the recovery rates it should be noted that there are no exclusions in the Greenwich calculations. Typically some boroughs will exclude certain categories of PCNs from their calculations which artificially increases the recovery rate calculation. This makes comparison from one authority to another difficult, as you are typically not comparing like for like. There is no consistent approach to exclusions but quite often they would include:

- a) Stolen Vehicles
- b) Diplomatic Vehicles
- c) Foreign Vehicles
- d) No Trace at DVLA

	Jan-24	Dec-23	Nov-23	Oct-23	Sep-23	Aug-23	Jul-23	Jun-23	May-23	Apr-23
All PCNs										
Total Issued	131137	133327	135305	137786	139023	138655	138415	138903	137966	136584
Open	36,397	36,860	36,861	37,715	39,046	39,387	38,867	38,562	37,914	37,607
Closed	94,740	96467	98444	100071	99977	99268	99548	100341	100052	98977
Paid	81,647	83033	84841	86440	86946	86369	86927	87545	86976	86023
Paid %	62.26%	62.28%	62.70%	62.73%	62.54%	62.29%	62.80%	63.03%	63.04%	62.98%
Paid £	£ 5,949,908.31	£ 6,054,387.81	£ 6,216,767.65	£ 6,343,228.29	£ 6,368,313.95	£ 6,314,647.72	£ 6,343,611.82	£ 6,382,662.71	£ 6,345,123.56	£ 6,266,245.76
Average Value	£ 45.37	£ 45.41	£ 45.95	£ 46.04	£ 45.81	£ 45.54	£ 45.83	£ 45.95	£ 45.99	£ 45.88
Average Paid Value	£ 72.87	£ 72.92	£ 73.28	£ 73.38	£ 73.24	£ 73.11	£ 72.98	£ 72.91	£ 72.95	£ 72.84

This can be further subdivided by key workstreams

## 8.2 Bus Lanes

Bus Lane	Jan-24	Dec-23	Nov-23	Oct-23	Sep-23	Aug-23	Jul-23	Jun-23	May-23	Apr-23
Total Issued	28885	30158	30751	31789	32136	31746	30523	29843	29243	29152
Open	7044	7184	7285	7622	8347	8769	8078	7780	7379	7109
Closed	21841	22974	23466	24167	23789	22977	22445	22063	21864	22043
Paid	16248	17146	17642	18408	18604	18232	18398	18349	18221	18516
Paid %	56.3%	56.9%	57.4%	57.9%	57.9%	57.4%	60.3%	61.5%	62.3%	63.5%
Paid £	£ 1,243,256.13	£ 1,312,780.48	£ 1,355,385.48	£ 1,413,335.48	£ 1,411,643.30	£ 1,380,039.60	£ 1,360,389.30	£ 1,355,534.30	£ 1,347,906.30	£ 1,366,713.95
Average Value	£ 43.04	£ 43.53	£ 44.08	£ 44.46	£ 43.93	£ 43.47	£ 44.57	£ 45.42	£ 46.09	£ 46.88
Average Paid Value	£ 76.52	£ 76.56	£ 76.83	£ 76.78	£ 75.88	£ 75.69	£ 73.94	£ 73.88	£ 73.98	£ 73.81

## 8.3 Moving Traffic

Moving Traffic	Jan-24	Dec-23	Nov-23	Oct-23	Sep-23	Aug-23	Jul-23	Jun-23	May-23	Apr-23
Total Issued	28508	29621	31608	33561	36976	36231	36771	36012	36934	35539
Open	7440	7804	8135	8695	9833	9614	9788	9310	9752	9495
Closed	21068	21817	23473	24866	27143	26617	26983	26702	27182	26044
Paid	20325	21050	22641	23933	26033	25635	25927	25480	25911	24853
Paid %	71.3%	71.1%	71.6%	71.3%	70.4%	70.8%	70.5%	70.8%	70.2%	69.9%
Paid £	£ 1,556,643.04	£ 1,611,101.29	£ 1,745,924.64	£ 1,849,873.64	£ 2,012,695.45	£ 1,975,884.15	£ 2,007,985.70	£ 1,972,336.05	£ 2,008,932.00	£ 1,922,826.05
Average Value	£ 54.60	£ 54.39	£ 55.24	£ 55.12	£ 54.43	£ 54.54	£ 54.61	£ 54.77	£ 54.39	£ 54.10
Average Paid Value	£ 76.59	£ 76.54	£ 77.11	£ 77.29	£ 77.31	£ 77.08	£ 77.45	£ 77.41	£ 77.53	£ 77.37

## 8.4 Parking Civil Enforcement Officers

Parking CEO	Jan-24	Dec-23	Nov-23	Oct-23	Sep-23	Aug-23	Jul-23	Jun-23	May-23	Apr-23
Total Issued	64483	64366	64167	64172	62237	62203	63632	63274	63496	63551
Open	36787	36788	36788	36788	36788	19046	19473	19233	19200	19377
Closed	44567	44386	44511	44523	43024	43157	44159	44041	44296	44174
Paid	38324	38119	38162	38139	37424	36773	37436	37166	37168	36984
Paid %	59.4%	59.2%	59.5%	59.4%	60.1%	59.1%	58.8%	58.7%	58.5%	58.2%
Paid £	£ 2,655,279.94	£ 2,637,641.84	£ 2,644,888.98	£ 2,643,250.62	£ 2,537,095.20	£ 2,538,473.97	£ 2,580,106.17	£ 2,614,861.06	£ 2,544,598.96	£ 2,538,779.46
Average Value	£ 41.18	£ 40.98	£ 41.22	£ 41.19	£ 40.77	£ 40.81	£ 40.55	£ 41.33	£ 40.07	£ 39.95
Average Paid Value	£ 69.29	£ 69.19	£ 69.31	£ 69.31	£ 67.79	£ 69.03	£ 68.92	£ 70.36	£ 68.46	£ 68.65

## 8.5 Parking CCTV

CCTV Parking	Jan-24	Dec-23	Nov-23	Oct-23	Sep-23	Aug-23	Jul-23	Jun-23	May-23	Apr-23
Total Issued	9260	9185	8782	8212	7677	7338	7438	8272	8423	8345
Open	1995	1892	1785	1730	1653	1587	1521	1567	1613	1626
Closed	7265	7293	6997	6482	6024	5751	5917	6705	6810	6719
Paid	6751	6721	6399	5935	5524	5081	5126	5745	5760	5673
Paid %	72.9%	73.2%	72.9%	72.3%	72.0%	69.2%	68.9%	69.5%	68.4%	68.0%
Paid £	£ 494,469.20	£ 492,864.20	£ 470,568.55	£ 436,768.55	£ 406,880.00	£ 373,420.00	£ 391,750.65	£ 439,571.30	£ 443,686.30	£ 437,926.30
Average Value	£ 53.40	£ 53.66	£ 53.58	£ 53.19	£ 53.00	£ 50.89	£ 52.67	£ 53.14	£ 52.68	£ 52.48
Average Paid Value	£ 73.24	£ 73.33	£ 73.54	£ 73.59	£ 73.66	£ 73.49	£ 76.42	£ 76.51	£ 77.03	£ 77.19

8.6 It can be noted from the tables that the three CCTV workstreams have a substantially higher recovery rate (both in value and percentage) than the CEO one. This is driven by two factors:

- Typical lower value of the CEO PCNs (value)
- Less mitigating reasons for the CCTV offences (percentage)
- Lower value of parking PCNs compared with Bus Lane and MTC in absolute terms
- Greater provision for statutory exemptions and mitigating circumstances in parking PCNs due to the nature of the contraventions vs the more clear cut moving traffic contraventions and bus lane infractions.

- All CCTV PCNs issued have the non-compliance with DVLA registration of the fleet of vehicles contravening pre-filtered before issuance, as they cannot be issued a PCN without a DVLA entry so never enter the initial total, whereas an on street PCN has an amount that are going to come back as no DVLA entry/foreign vehicles/clones/illegal plates that then comes of the initial total.

## **9. Service Challenges**

- 9.1` There are several pressing issues that impact the service including:
- a) Overall Structure / Resourcing
  - b) Civil Enforcement Service
  - c) Pay & Display network
- 9.2 The service is structured and resourced substantially as it was before CCTV was introduced resulting in a substantial mismatch between workloads within the back office compared to resource available and service delivery. Particularly in the back office where PCN challenges and appeals are delt with in addition the border general administration of the service, including permit administration, general enquiries and bay suspension.
- 9.3 Budget provision was made in the 2023/24 account for a significant restructure of Parking Services and wider Transport teams. The restructure has not been implemented as yet and as at the date of this report is awaiting decision; if approved, implementation will take place following the approval, with any consultation with affected staff undertaken in accordance with the Council's procedures.

Subject to the above process and when implemented, the re-structure would see substantial changes to senior management structure and back-office elements of Parking Services and in addition to an increase in headcount, would address of the historical low pay point of the Back Office officers who at Scale 4–5 are believed to be the lowest in London.

- 9.4 The CEO service operates from offices based in Calderwood Street Car Park and comprises of:
- a) 32 Front Line Staff
  - b) 3 Supervisors,
  - c) 2 Managers

9.5 In respect to the CEOs specifically there is a split of FTE (12) & Agency (17) as an informal hybrid model , with 3 current vacancies.

Operationally the service is adequate (but not leading), is under resourced and typically not meeting Resident or Members Demands (circa 1,400 public / 250 Member contacts per year)

9.6 For many years the service was behind the curve compared to other London Boroughs. It is catching up, as has been demonstrated over the past circa 2 years the division has introduced new policies, systems and back office capacity/functionality have or are being addressed.

9.7 Future challenges will include:  
Expansion of Controlled Parking Zones which will generate fluctuating waves of activity but will mostly result in the need to increase to 50+ CEOs and therefore the potential for a second operational base will be required.

9.8 Growth of Night-Time Economy, this will result in the need for Late night / overnight Enforcement and therefore a change in use / contractual arrangements for existing staff.

9.9 Other challenges will include the growth of Home Delivery Services and the use of Scooters in Residential areas and therefore will lead to an increased expectation from residents.

9.10 Continual requests for additional enforcement both in and outside CPZ areas are received and we have a low presence in / at:

- a) Schools
- b) Evenings / Nights
- c) Hot Spots such as Horn Link / Norman Way
- d) Residential areas outside core CPZ network

9.11 The service has numerous challenges that include (but not limited to)

- a) Expansion of Controlled Parking Zones
- b) Growth of Night-Time Economy
- c) Growth of Home Delivery Services

- 9.12 At the Scale 5 pay point (the CEO pay grade) the transport and hospitality sectors in particular run almost open ended recruitment campaigns with sign-on bonuses and funded retraining opportunities. In simple terms an agency worker at Scale 5 can quite readily find full time alternative employment and there is a lack of candidates when a agency vacancy does arise. The service will face substantial challenges meeting the requirements of the Transport Strategy in terms of flexibility, scale and ability to deliver innovation and transformation
- 9.13 It is noted that the use of Pay & Display machines has been steadily reducing year on year and we expect that less than 10% of our casual parking income will be collected via the Pay & Display Machines this year (with 90% collected via phone parking) .  
The most recent actuals are:
- a) August 8.2%
  - b) September 10.2%
  - c) October 7.7%
  - d) November 11.00%
  - e) December 7.73%
  - f) January 8.72%
  - g) February 8.31%
  - h) March 7.59%
- 9.14 The Pay & Display infrastructure is in many cases over ten years old with numerous machines approaching the twenty-year mark.
- 9.15 Last year (2022/23), the cost of maintaining the current Pay & Display infrastructure equated to approximately 50% of the total actual cash the network of machines collects i.e. we pay out 50p for every £1 put in the machines in direct cost.
- 9.16 This year we expect that equation to pass the 65% mark and be above 80% with a relatively short timeframe i.e. for every £1 we collect we will pay out 80 pence in direct cost.
- 9.17 Our current position of retaining our Pay & Display machines is at stark contrast to an increasing number of boroughs (including our neighbours Bromley ) who have removed their Pay & Display machines already or are actively planning to do so. Link to Bromley's decision linked here:

9.18 Some proposed parking fees changes, intended to ensure that the traffic management effect of our charging regime it maintained relative to other charges and other Boroughs, are forecast to generate a surplus income. As well as these, some cost saving initiatives have been proposed which together will help to close the gap. These are set out in the MTFs savings from 2024/25 or later onwards (see chart) agreed by Cabinet in February 2024. The scale is relatively modest compared to the gap but represents a realistic take on the opportunity presented. These are set out below.

Proforma Number	Title	Saving (£ '000)			
		24/25	25/26	26/27	27/28
19	Optimisation of Parking Enforcement Operations (inhouse/outsourcing review)	298	298	298	298
20	Review Non-Residential Permit Charges	25	50	50	50
21	Make motorcycles buy a Resident Permit	0	40	40	40
22	Remove all Pay & Display Machines and move to 'Cashless Only'	85	185	185	185

9.19 A further initiative to see an inflationary revision of the PCN levels is a lobbying position for the Council but is outside our power to grant, being reserved to the Secretary of State for Transport in consultation with London Council's Transport and Environment committee (TEC). There are strong traffic management grounds to review the charges but the Westminster political impact of that change is one that has seen PCNs frozen for well over a decade and therefore significantly reduced as a result of inflation in terms of their deterrent impact to motorists. This is however allocated to the service in the MTFs and will represent a



pressure as there are no present indications it will be approved by central government.

Proforma Number	Title	Saving (£ '000)			
12	Statutory review of Level of Penalty Charge Notices charge	298	298	298	298

## 9.20 Summary

In summary assumptions and subsequently expected decisions being made in changing environment haven't actualised.

As a result our programmes are being reviewed collectively with new assumptions with a more realistic view on what is achievable but more realistic outlook. Within the Council's ability to generate a surplus through its ability to provide Traffic Management schemes, officers will work with members to develop new plans, with their ultimate goal to achieving compliance and align with our policies and strategies.

### 10. Available Options

Not applicable – this is an information only report.

### 11. Preferred Option

Not applicable – this is an information only report.

### 12. Reasons for Recommendations

Not applicable – this is an information only report.

### 13. Consultation Results

None required and none undertaken.

#### 14. Cross-Cutting Issues and Implications

<b>Issue</b>	<b>Implications</b>	<b>Sign-off</b>
<b>Legal</b> including Human Rights Act	The Panel is asked to note the overview provided by this report of parking and traffic enforcement activity. There are no legal implications arising directly from the report.	Eleanor Penn, Assistant Head of Legal Services (Planning & Procurement), 23 <sup>rd</sup> April 2024 Ref: 95842
<b>Finance</b> and other resources	The purpose of this report is to update the Corporate Finance & Performance Scrutiny Panel on the Street Enforcement/ Kerbside Strategy activity in relation to the council's powers as they relate to its status as an Enforcement Authority This report provides information for the Scrutiny Panel to note and there are no formal decisions required. Therefore, there are no direct financial implications arising from this report. Any future decisions arising would be subject to separate reporting.	Sue Rock Accountancy Business Change Manager 23/04/2024
<b>Equalities</b>	There is no decision required beyond noting the contents and as such this paper has a remote or low relevance to the substance of the Equality Act. It is noted however that surplus income from on-street charging and any penalty charge payments received (whether for on-street or off-street enforcement) must only be used in accordance with section 55 (as amended) of the Road Traffic Regulation Act 1984, which in simple terms limit its use to transport	Ryan Nibbs 27 <sup>th</sup> March 2024

	<p>related activities. In Greenwich the primary use this surplus is to offset the annual Concessionary Fares bill which in effect is a service for elderly residents and therefore an indirect beneficial link to the Council's Equality and Equity Charter and the Council's Equality Objectives 2020-2024</p> <p><b><i>This report recommends no new action. Therefore, the recommendations of this paper have a remote or low relevance to the substance of the Equality Act; and there is no apparent equality impact on end users. Similarly, the recommendations do not contribute to the Council's Equality and Equity Charter, and the Council's Equality Objectives 2020-24.</i></b></p> <p><b><i>The development of the Transport Strategy referred to above has however been subject to a full Equalities Impact Assessment. The separate decision report considering its adoption set out how equalities were considered in the decision pursuant to that report, and what contribution it made to the Council's Equality and Equity Charter, and the Council's Equality Objectives 2020-24.</i></b></p>	
<p><b>Climate change</b></p>	<p>The enforcement activity contributes to the smooth operation of the borough network which reduces congestion, a primary cause of tailpipe emissions thereby linking directly to the Greenwich Carbon</p>	<p>Ryan Nibbs 27<sup>th</sup> March 2024</p>

	<p>Neutral Plan agreed by Cabinet on 18 November 2020</p> <p>This report recommends no new action, so it would not have a direct impact on climate change or the Carbon Neutral Plan as agreed by Council on 24<sup>th</sup> November 2021.</p> <p>The development of the Transport Strategy referred to above responds directly to actions set out in the Council's adopted Carbon Neutral Plan and explicitly contributes to the Carbon Neutral Plan commitment.</p> <p>The separate decision report considering its adoption set out how the decision pursuant to that report contributed to the Council's adopted Carbon Neutral Plan and the Carbon Neutral Plan commitment.</p>	
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## 11. **Report Appendices**

11.1 The following documents are to be published with and form part of the report:

- A PCN Issuance 2022/23 in London
- B Transport income per head (2018/19)
- C1 Gross income on and off street parking (London and by authority type) 2018/19
- C2 Net income on and off street parking (London and by authority type) 2018/19
- C3 Net after concessionary fares (London and by authority type) 2018/19
- C4 Income to expenditure ration for on and off street parking (London and by authority type) 2018/19
- D Cabinet 2021 proposals
- E1 Gross income on and off street parking (London and by authority type) 2022/23

- E2 Net income on and off street parking (London and by authority type) 2022/23
- E3 Net after concessionary fares (London and by authority type) 2022/23
- E4 Income to expenditure ratio for on and off street parking (London and by authority type) 2022/23

## **12. Background Papers**

Council 26 February 2020

Council 25 February 2021

Council 24 February 2022

Council 23 February 2023

Council 6 March 2024

Road Traffic Regulation Act 1984

Road Traffic Act 1991

Traffic Management Act 2004 (Part 6)

London Local Authorities Act 1996

The Civil Enforcement of Road Traffic Contraventions (Approved Devices, Charging Guidelines and General Provisions) (England) Regulations 2022 (S.I. 2022/71)

The Civil Enforcement of Road Traffic Contraventions (Representations and Appeals) (England) Regulations 2022 (S.I. 2022/576)

The Civil Enforcement Officers (Wearing of Uniforms) (England) Regulations 2007 (S.I. 2007/3485)

[Tribunals, Courts and Enforcement Act 2007](#)

[Taking Control of Goods Regulations 2013](#)

Report Author: Ryan Nibbs  
Job Title: Assistant Director Transportation  
Tel: 020 8921 2397  
Email: ryan.nibbs@royalgreenwich.gov.uk

Reporting to: Mirsad Bakalovic  
Job Title: Director of Communities, Environment and Central  
Tel: 020 8921 6432  
Email: Mirsad.bakalovic@royalgreenwich.gov.uk

Chief Officer: Mirsad Bakalovic  
Job Title: Director of Communities, Environment and Central  
Tel: 020 8921 6432  
Email: mirsad.bakalovic@royalgreenwich.gov.uk

Chief Officer: Damon Cook  
Job Title: Director of Finance  
Tel: 020 8921 3508  
Email: damon.cook@royalgreenwich.gov.uk