

## **APPENDIX 1 – Summary of issues raised by affected district and borough councils**

### **Lack of opportunity to put forward alternative proposals**

1. A number of district and borough councils felt that they were not being given an opportunity to consider how they might contribute to the County Council's costs associated with on-street parking controls. They felt that terminating the agency agreements had not tried to find another way, such as setting a maximum sum for district costs for on-street parking enforcement.

The County Council's response

2. While some district and borough councils have made some progress in reducing their operational deficits, the district agency model is unable to reimburse the County Council for its associated costs including maintaining signs and lining and contributing towards the expenditure of running the district agencies.
3. While it may be possible for district and borough councils to contribute directly to the County Council's costs by increasing parking charges, this could cover where savings and efficiencies are achievable with a single countywide service, potentially losing the opportunity for the most cost-effective service.
4. Whilst the service changes are relatively new in Hampshire, the majority of County Councils in England are either delivering on-street enforcement directly themselves or via a partnership arrangement with a specialist service provider.

### **Loss of efficiency**

5. Concerns were raised that the proposals could lead to less efficient local parking enforcement as the district and borough council services do not differentiate between on and off-street enforcement, undertaking both as part of enforcement beats. The current district agency model for on-street enforcement is provided at a nil cost to the County Council. By terminating the agreements, the cost will transfer to the County Council and is likely to outweigh any financial gain from perceived efficiencies arising from a single countywide on-street parking enforcement service.

The County Council's response

6. The County Council developed a directly managed, modernised on-street parking service as part of the Transformation to 2019 savings proposals, delivering the on-street parking service across Fareham, Gosport, New Forest and Test Valley. The new directly managed parking service is shown to be more efficient than the district delivery model.
7. The proposals will deliver efficiencies in countywide on-street parking enforcement and help the authority recover its associated full costs. It is vital that the County Council is able to deliver services on a full cost recovery basis and

the district agency model does not facilitate this. Looking ahead it is very important that on-street parking does not continue to draw funding away from our limited highway budgets. Any impact on district and borough council's off-street parking service will be limited.

### **Impact on customers**

8. From the customer's perspective, it is not clear which services are provided by the County Council and which are delivered locally by district and borough councils. The apparent duplication between on-street and off-street parking enforcement is likely to appear to residents and businesses as inefficient.
9. A concern has been raised about the potential financial incentivisation for a private sector operator to issue large numbers of PCNs to increase income.
10. Rural areas will be unlikely to receive the same quality of service compared with urban areas as enforcement activities will be concentrated on areas of high traffic and contravention of regulations.
11. Specific concerns were raised about customer expectations not being met for traffic management, with district and borough councils more able to be responsive to local community needs, with local consultation.
12. The County Council's response
13. Similar concerns were expressed prior to ending the agency arrangements in Fareham, New Forest and Test Valley, but experience in practice has shown that these issues do not generally arise. Those who receive a PCN, whether on-street or within car parks, are provided with full details of the issuing authority together with payment and appeal details. The County Council's website has a dedicated parking page that provides extensive information and facilitates a range of functions from payment of PCNs through to purchasing parking permits.
14. The Parking Services contract is based on paid enforcement hours, not PCNs issued, with extensive use of parking technology, such as digital permit systems, to help drive down costs.
15. Whilst it would be expected that the main focus of enforcement activity will be directed to those areas with the most problems, the Parking Services contract includes Key Performance Indicators (KPIs) requiring CEOs to regularly patrol all parking controls.
16. With regard to the specific concern in respect of local traffic management, this will not necessarily be affected as many traffic management functions are not included in the existing agency agreements.

### **Impact on communities**

17. Concerns were raised that in moving to data led deployment of on-street parking enforcement, the County Council would not be able to provide genuinely local

service, undermining community relationships built up over time and leading to reputational damage for both parties. It was felt that, from the local perspective, there would be no benefit in moving to a single, countywide service where the ability to deploy local resources in response to problems could be lost because the number of districts competing for resources will increase.

18. While there was support for the wider policy outcomes, there were also concerns about the impact of a high-level policy led service on nuanced local issues, with a need to ensure meaningful consultation with district and borough councils and recognise the importance of engaging with local communities in constructive dialogue, including reviewing potential options and opportunities that may improve services to residents.
19. Concerns were raised about the impact on local communities and a potential loss of investment in local projects currently provided by district councils, but which the County Council may not necessarily provide in the future.

#### The County Council's response

20. Similar concerns were raised by the district and borough councils in the four areas that the County Council now controls, but such issues have not arisen. The County Council is the sole client for the Parking Services contract and there will be no issue over districts competing for resources. The County Council determines all aspects of the service including the hours of enforcement, priority locations and the policies to which CEOs work to, with contract performance monitored through a range of KPIs. By having complete focus on the on-street service, the County Council is able to flex and adapt frontline resources to deal with demand as necessary, directing a pool of scalable resources to target parking hotspots as and when they arise without resourcing constraints or being tied to district boundaries.
21. The County Council can respond to local issues either reported to CEOs or via the automated enforcement request system whereby residents can report issues themselves via the simple online form.
22. Local complexity in particular parking controls, including resident parking permit schemes, will need to be worked through in detail to understand how the transition will work in practice, and whether any changes to current arrangements are required.
23. With regard to the concern in respect a potential loss of investment in local projects currently provided by district councils, the proposal only relates to ending agency arrangements for civil parking enforcement and for traffic management. Nothing in this proposal limits collaborative working on locally important projects where funding is prioritised for traffic management and parking controls.

#### **Impact on staff**

24. All districts and borough councils noted the impact on staff and wanted early clarification on staff transfer, roles and responsibilities in the new County Council team. Clarification would also be required for the transfer of asset.
25. Some district and borough councils expressed a concern that the resources needed to run the service had been underestimated, with the scope for savings exaggerated.

#### The County Council's response

26. Formal discussions on staff transition cannot commence before serving notice to terminate the agency agreements. The County Council will work with district and borough council colleagues to provide the desired clarity on the staff transition arrangements.
27. Should TUPE requirements arise from the withdrawal of the agreements, all appropriate HR and Legal processes will be followed, including engagement with affected staff.
28. The County Council will also work with district and borough council colleagues on the transition of parking assets.
29. Efficiencies will accrue from economies of scale and not necessarily through reducing resourcing across each district. It is recognised that each district/borough is different and has different demands.

#### **Loss of local ambassadorial role of Civil Enforcement Officers**

30. Some district and borough councils cited the added ambassadorial role of CEOs in signposting local services and felt that integrating on and off-street enforcement in CEO beats enhanced this added ambassadorial role.
31. The County Council's response
32. This ambassadorial role is equally or more applicable to other highways functions such as reporting potholes or defective street lighting, and to wider County Council functions.

#### **How civic events will be managed in the future**

33. Some district and borough councils asked how civic events will be managed in the future, noting that they currently manage these events in-house. They were concerned that while they will retain powers to close roads under the Town and Police Clauses Act, they may not be able to sustain the technical resource in the future if the responsibility for processing other temporary Traffic Regulation Orders transfers to the County Council. There was also a concern about coordinating parking related suspensions as it will no longer be one internal team.

34. A number of district and borough councils identified examples of civic events where an increased CEO presence has been helpful, and which has been straightforward to arrange as a district delivered service. Concerns were raised about how these events might be supported in the future, particularly around costs and availability of resource

The County Council's response

35. While there would not be scope for CEOs to act as marshals for civic events, where there are enforceable parking restrictions for CEOs to patrol and/or parking suspensions to be administered, then there may be scope to assist.
36. Where there will be an impact on managing major events e.g., traffic management involvement with the Safety Advisory Group (SAG), then this will be provided by the County Council's Highways Service in addition to their current role in the SAG.
37. Where there are local concerns about a smaller event's impact on a community, such as school parents' evenings etc, then the County Council's Parking Service can provide sensitive management of traffic and parking to support this.
38. Support for planning significant civic events and coordinating associated road closures and parking suspensions can be provided subject to local funding.

#### **Future collaborative management of on and off-street parking**

39. A number of district and borough councils feel that in implementing the countywide service, the County Council should give consideration to the role of parking in achieving policy objectives at a local level, specifically how the County Council proposes to engage with partners on this and also provide an appropriate degree of responsiveness to local issues. District and borough councils wanted to be reassured that the County Council will work collaboratively with them to achieve ambitions in areas like air quality, climate change and town centre management, and will not frustrate their plans.

The County Council's response

40. In the future, there will need to be positive engagement with the district and borough councils on parking and traffic management, and consultation on pricing strategy for on and off-street parking, with sufficient time for a dialogue with district and borough council colleagues prior to making any changes. We propose to develop partnership working with district and borough councils on future parking and access plans to support this.

#### **Policy**

41. While district and borough councils generally agreed with the County Council's emerging transport and climate change policies, some felt that there would be considerable local variation, not least between rural and urban locations, that would require a more nuanced approach.

#### The County Council's response

42. The current agency arrangement for civil parking enforcement and for traffic management is not a devolved service, and there is no change in the policy arrangements, which have always been for the County Council to determine.
43. It is agreed that no two Hampshire districts are the same. The County Council's soon to be published Local Transport Plan 4 will set out the vision, outcomes and guiding principles for transport in Hampshire. A modern and efficient traffic enforcement service will be a key element to the future of transport in the County.

#### Timings

44. A number of districts and boroughs felt that transferring the on-street parking enforcement service would be simplified by timing this to take place with the start of a new financial year. Some districts and boroughs felt that ending the agency agreements for traffic management could happen sooner than the twelve-month notice period, but that there will need to be a dialogue on data transfer for Traffic Regulation Orders and for residents parking.
45. There will also need to be communications strategy to prepare residents for the change.

#### The County Council's response

46. There may be scope to reduce the individual notice periods to coincide with the start of a new financial year i.e., 1 April 2023, but the actual time required will be subject to completing any staff transfer processes, which will be reliant on all parties' active participation. Extending notice periods to coincide with the end of the financial year i.e., 31 March 2024 may be possible where there are specific transition issues that could be resolved by extending the notice period.
47. A communications plan to support the change will be developed in collaboration with district and borough council colleagues. Similar concerns were expressed with the earlier ending of agency arrangement in Fareham, New Forest and Test Valley, and with the commencement of civil parking enforcement in Gosport, and the County Council planned ahead and publicised these changes through various media channels coupled with direct communication to residents where needed.