

 the low tax borough	London Borough of Hammersmith & Fulham CABINET 24 JUNE 2013
HOUSING REVENUE ACCOUNT PARKING AND GARAGE STRATEGY	
Report of the Cabinet Member for Housing, Councillor Andrew Johnson	
Open Report	
Classification: For Decision	
Key Decision: yes	
Wards Affected: All	
Accountable Executive Director: Melbourne Barrett, Executive Director of Housing & Regeneration	
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1. EXECUTIVE SUMMARY

- 1.1 The arrangements for parking and management of garages inherited from the Arm's Length Management Organisation (ALMO) were not financially sustainable or appropriate following a change in legislation that stopped the Council from enforcing parking control by towing and clamping cars. As a result the parking enforcement contract was terminated. Income from both car parking charges and garage charges is inadequate to provide an effective service or to manage the assets.
- 1.2 This report sets out the key options and issues for both the management of garages and for the management of parking on Council estates. It recommends new garage charges and a policy for effective management of the asset.
- 1.3 The report also presents the results of resident consultation on potential parking management options including charging and enforcement and a charging policy for garages and the use of garages as HRA assets.

- 1.4 The recommendations for Members to consider are the implementation of a new garage charging policy and a policy for management, disposal and investment in the garage stock. The report asks Members to note the results of the full S105 resident consultation and that further feasibility work on parking options will be the subject of a report to Cabinet following the completion of a full options appraisal.

2. RECOMMENDATIONS.

- 2.1. That the outcome of the formal section 105 consultation with residents on parking and garage options be noted.
- 2.2. That approval be given to the new management arrangements for garages including a new charging policy for garages, which will set a monthly flat fee for garage rent, and advance payment only (three months in advance), as set out in paragraphs 6.8 to 6.14.
- 2.3. That the introduction of a policy for redevelopment, disposal, investment and change of use of garage sites as set out in paragraph 6.13 of this report and Appendix 1 be approved.
- 2.4. That the progress and on-going review of parking control options be noted and that approval be given to the concept that all those that wish to park on HRA housing estates or land must pay a flat fee annual charge to do so.

3. REASONS FOR DECISION

- 3.1. Cabinet approval is required to ensure that garage assets are managed effectively in line with the HRA Asset Management Plan and charging policy is financially sustainable in line with the Medium Term Financial Strategy and the 30 HRA business plan.
- 3.2. That the outcome of the statutory S105 consultation on parking and garage options is noted and that Cabinet notes the intention to carry out further feasibility work on the options to manage estate parking.

4. INTRODUCTION AND BACKGROUND

- 4.1. The management of the Borough's housing stock returned to the Council from the ALMO on 1st April 2011 and on 28th March 2012 HRA reform was implemented nationally. This means that Local Authorities have become "self financing" and have to manage their housing assets, including parking spaces and garages which form part of housing properties, to ensure they can be supported and maintained from Housing Revenue Account (HRA) income. There are a number of financial pressures on the Council's HRA and predicted HRA general reserves as at 1st April 2013

are equivalent in cash terms to less than 4 weeks rental income¹. A Medium Term Financial Strategy (MTFS) savings programme is currently underway to improve the financial position of the HRA overall, freeing up investment for debt repayment, innovation and service improvement. The programme includes scope to increase rents, fees and charges in line with improvements in service quality.

- 4.2. The management of car parking and garages on HRA land falls within the remit of the MTFS programme and as a result the Council began a review of parking and garage provision. As part of the review the Council consulted residents on potential parking management options including a policy for consistent parking charges and options for enforcement and parking control. The consultation also sought resident's views on a new charging policy for garages and a strategy for garage asset management.
- 4.3. The review of garages on housing land is complete and consultation findings have been summarised in the consultation section of the report. The report includes garage rent proposals and for the potential use of garages.
- 4.4. The parking review concluded three main options for the future management of estate parking. These options are summarised in the options appraisal section alongside the approach adopted by other boroughs, further feasibility work is needed to determine the best way forward.
- 4.5. The issues identified in the review for both garages and parking are described below in the proposals and issues section of this report.

5. PROPOSAL AND ISSUES

5.1. Garages – Current arrangements

- 5.2. The review of garage management has led to 8 key findings.
- 5.3. Disparity of charges: There are four separate types of garage, with separate charges for each type. The charges range from £9.68 per week for a motorbike garage, to £13.69 for a full size and covered garage. The definitions are unclear and confusing.
- 5.4. Unsustainable charges: Current charges are well below private sector market levels which range from £260-£563 per month (£60-£130 per week) in the borough and are lower than other inner London boroughs. For example Kensington and Chelsea Tenant Management Organisation charge between £130-160 per month (£30-£60 per week) for a garage and in Wandsworth charges are zoned but similar garages are £82 per month

¹ More details are available in the HRA Financial Strategy and Rent Increase 2013/14 report which was approved by Cabinet on 11th February 2013.

(£19 a week) with garages in key locations advertised commercially at up to £260 a month (£60 a week). More detail can be seen in Appendix 2.

- 5.5. Under-performance of garage management: It is recognised that under the ALMO, management of the Council's garage stock did not meet expected service standards.
- 5.6. Lack of investment: The garage assets on HRA land have had little or no investment, as a consequence 19.7% of garages are empty and many are in an un-lettable condition.
- 5.7. Lack of demand: There are 1,277 garages of all types of which 252 are void (19.7%), of these 192 are long term, over 6 months and 60 are short term ready for letting. The reasons for the high void rates could be the lack of investment, a lack of demand on some estates or effective marketing. Appendix 3 shows current garage occupancy.
- 5.8. Lack of a clear disposal policy: Empty or abandoned garages are unsightly and are a drain on the HRA and there is a no clear policy on investment, demolition, disposal, redevelopment or change of use of garages.
- 5.9. Inappropriate use: Many garages are not used for the purpose of storing a vehicle instead, in many cases, flammable and inappropriate materials are being stored that create a health and safety hazard and some are being sub-let.
- 5.10. Utility bill charging for garages: The review found that utility charges are not identified on garage rental charges and that some garage sites do not have separate meters, so costs are included in the communal charges for the public parts of the estate rather than charged directly to the resident renting the garage. Action is currently in progress to rectify this situation as sites are identified.
- 5.11. To counter rising arrears and high void levels a new dedicated team has been formed with two garage officers created and recently filled on a permanent basis, they are meeting targets for the collection of garage arrears and letting garages that are of a lettable standard.
- 5.12. **Car Parking - Current arrangement**
- 5.13. The issues relating to the existing estate parking arrangements can be distilled into eight key findings:
- 5.14. An inconsistent service: There are currently a wide range of schemes across our estates, which are set out in Appendix 4 of this report. In summary, residents on 25 estates are charged for a parking bay while on 43 estates residents can park for free. On a further seven estates there is a mixture of free and paid-for bays and parking areas. This situation means that car parking is inequitable, difficult to manage, not in line with parking arrangements for HRA street properties, confusing for vehicle users and has led to complaints and under recovery of parking income.

- 5.15. This is also inconsistent with parking on the public highway across the borough where all but two residential roads are covered by permit based controlled parking schemes.
- 5.16. A lack of clarity on actual parking spaces available: Some estates with parking areas have no defined bays, this means it is difficult to assess overall parking capacity. There are 2,211 numbered parking bays on the Council's IT system and 1,300 free bays. However, it is estimated that vehicle capacity is nearer 4,000 overall.
- 5.17. A 71% void rate on paid-for parking bays: Of the 2,211 paid-for parking bays in the borough 1,565 (71%) are void (extracted from Iworld as at 22/08/12). This high void rate means that the Council generates only £72,931 per annum against a budgeted income of £423,000 under current arrangements.
- 5.18. Demand for parking - Current demand for car parking is difficult to assess, as waiting lists for parking are not consistently kept updated. It is estimated there is capacity for 4,000 vehicles and there are 1,085 garages that are let or available, therefore the total number of vehicles that can be accommodated is around 5,085. Demand from Council residents for parking is assumed to be around at 30-40% of 15,000 households requiring capacity for 4,500 to 6,000 vehicles.
- 5.19. Disparity in charges between HRA estate parking and street parking: The weekly charge for paid for parking bays on HRA land is £2.72 per week, which equates to £141.50 per year. The annual charge for a permit to park on the street is £119 for the first permit and £482 for the second.
- 5.20. Investment requirements: There is currently no cyclical maintenance programme or investment in technology to support enforcement of parking controls. This position means the Council is unable to provide a service that meets customer need or the investment estate parking requires.
- 5.21. Lack of a parking management contract: The contract that was in place to manage parking was terminated because it did not meet new legislative requirements under the Protection of Freedoms Act, meaning the Council is no longer able to tow or clamp on Housing land. This means there is currently no means of enforcing the parking conditions.
- 5.22. Free and subsidised staff parking: A review of staff parking led by the Chief Executive's Office, is currently taking place alongside the HRA review of parking. It is anticipated that this review will deliver savings to the HRA by reducing the number of permits issued to staff and the contribution the HRA currently makes toward staff parking at Kings Mall.

6. OPTIONS AND ANALYSIS OF OPTIONS

6.1. Options for Garages

6.2. The option appraisal for garages looked at two options:

- Option 1 Retain current arrangements; and
- Option 2 Simplify rental arrangements and agree a policy for the redevelopment, disposal, improvement and change of use of garages **(recommended for implementation)**.

6.3. Option 1 - Retain current arrangements

6.4. This would mean low weekly charges for garages, rent payable weekly (often in arrears), no investment in garages and no consistent allocation policy for garages.

6.5. The strengths of retaining current arrangements are that those residents that have a garage support keeping arrangements as they are.

6.6. The considerations of retaining current arrangements are:

- Low rental charges have led to a lack of investment in the asset leading to high void rates, which will continue to increase if the condition of the asset deteriorates and overall rental income will reduce further.
- Weekly charges are often paid in arrears and collection costs are high.
- In order to improve garages, the HRA would have to subsidise the cost. This would benefit a minority of council and private residents who rent garages.
- By not increasing charges to levels closer to neighbouring boroughs, there is an increased risk of inappropriate garage subletting. Further resources would be required to ensure garages are not sub-let or used for purposes other than the storage of a vehicle.
- It is recognised that under the ALMO, management of the Council's garage stock did not meet expected service standards.
- Some garage sites are unsightly and accessible to those who may potentially use them for anti-social behaviour which may impact on resident's feelings of security and the general appearance of the neighbourhood.
- The Council is not maximising the opportunity to develop more homes for local residents or reinvest in the garage stock through increasing capital resources available to the HRA from disposal of garages sites, where it is economically unviable to retain them.
- Utility charges are not identified on garage rental charges and some garage sites do not have separate meters, so costs are included in the

communal charges for the public parts of the estate rather than charged directly to the resident renting the garage.

- 6.7. **Option 2 - Simplify rental arrangements and agree a policy for the redevelopment, disposal, improvement and change of use of garages.**
- 6.8. The recommendation is to reduce the types of garages from 4 to 2 and let garages on a monthly basis at a flat rate of £100 for a garage and £75 for a motorcycle garage. This compares to the current average weekly garage rent let to a Council resident of £13.69, which equates to £59.32 a month.
- 6.9. The proposed charges remain below other neighbouring London boroughs. For example Kensington and Chelsea Tenant Management Organisation charge between £30-£60 for a garage per week (£130 to £260 per month) and in Wandsworth charges are zoned but in key locations advertised commercially at up to £60 a week.
- 6.10. As a condition of all garage lettings, payment would be three months in advance and by direct debit or standing order only, with payment for utility charges where appropriate.
- 6.11. It is expected that income in 2013/14 will be broadly in line with the current year's budget of £845k at between £818k and £880k. This is because implementation is likely to take place from December 2013 and a number of garage sites are likely to be taken out of commission and some will require upgrading before they can be re-let. Predicted garage income in 2014/15 is between £870k and £1.055m.
- 6.12. Where demand is high the allocation of a garage will be limited to one per household and only if all criteria are met for example that:
- no monies are owed to the HRA or the council in general
 - the vehicle is registered to the person applying at the address given and proof of residence and ownership is provided and other conditions set out in the licence agreement are met.
- 6.13. A clear policy has been developed to make informed choices about the use of garage sites based on financial viability. The policy prioritises potential sites for housing redevelopment and, as part of the process, will look at alternative parking facilities; the policy also assesses the viability of investing in retained garage site or changing their use. The policy is attached at Appendix 1 of this report, it is recommended that this policy is agreed and implemented immediately. £250k of funding has been allocated within the 2013/14 HRA Capital Programme to improve garages and enable them to be let effectively. On-going maintenance and management costs will be met from future rental income from garages.
- 6.14. Finally, option 2 will introduce an effective method of marketing empty garages to publicise their availability and the allocation policy.

6.15. **Garage Management arrangements**

6.16. The management of garage assets under the ALMO did not meet expected service standards. This has been a priority area for improvement and as part of the review of Housing Services a new dedicated team has been formed with two garage officers created and recently filled on a permanent basis. There has been a marked improvement under the existing garage management arrangements with arrears steadily decreasing early intervention measures such as standing order and direct debit arrangements put in place to help improve income collection. The team will implement the new policy and those currently renting garages will be required to meet the new criteria and to sign new licence agreements. The team will ensure record keeping is accurate and up to date and vacant garage spaces are marketed effectively and let quickly. Located in the central Client Team the garage officers will be best placed to work with other Council departments such as repairs and income collection as well as with the neighbourhood housing teams.

6.17. **Options for Car Parking**

6.18. There are three main options for parking on housing estates, enforcement through the use of parking charge notices using contract and tort law; implementing Traffic Management Orders or; to continue with the current arrangements.

6.19. This report summarises the options and expands on the attached summary table in Appendix 5 which describes the route other boroughs have taken or are planning to implement.

6.20. It is evident from the review and the range of solutions implemented by other London boroughs that there are strengths and weaknesses to all options. A suitable parking solution for Hammersmith and Fulham estates still requires further work and may require the implementation of a single or mixed approach. Further feasibility work is required to assess these options in more detail, balance them against the aims of the Council and the outcome of the consultation results.

6.21. **Option 1 - Parking charge notices**

6.22. The Protection of Freedoms (PoF) Act received Royal Assent in May 2012, banning clamping on private land with effect from October 2012.

6.23. From October onwards parking control through the application of trespass and tort law has only been possible by issuing civil parking charge notices. These notices are issued on the basis of driver liability.

6.24. Government committed to enabling schedule 4 of the PoF Act, subject to there being a suitable appeals process. This appeals process is now managed by the British Parking Authority and has led to the establishment of statutory procedures allowing private landowners to enforce Parking

Charge Notices against the registered keepers, where a driver cannot be identified.

6.25. Other boroughs

6.26. Contract law Parking Charge Notices (CPCN) are used or will be used by half of London boroughs surveyed. 12 currently use a private contractor to issue CPCN and a further three are in the process of procuring a contractor.

6.27. K&C have been issuing CPCN since January 2013 and in that time 34% of tickets issued have been paid. This is income received from the issuing of tickets alone, without any follow up action. K&C are in the process of implementing a traffic management order covering all estates, moving away from CPCNs.

6.28. Westminster use a private contractor to enforce CPCN and have no plans to move to a TMO to control parking arrangements at present.

6.29. **Option 2 - Traffic Management Order under the Road Traffic Regulations Act.**

6.30. The current advice from London Councils is that all local authorities should create Traffic Management Orders (TMO) using the Road Traffic Regulation Act 1984 in order to control parking on private land in their ownership.

6.31. To do so would require:

- Drafting an order, which is a standardised document covering estates and stating how and where the enforcement arrangements will operate.
- Statutory consultation over the terms of the order, including public advertising.
- New signage to all estates and, in some cases, improved road marking to ensure the terms on which parking is permitted are clearly visible and adhere to the order.
- No individual bays can be reserved on highways so all parking areas have to be for generic parking use with the appropriate demarcation of parking areas rather than individual bays.

6.32. If approved, enforcement would be carried out via the issue of Penalty Charge Notices, a form of ticket backed by statutory law. It would be possible for the Council to procure a private contractor to deliver this service or for its own highways department to do so.

6.33. Other boroughs

6.34. Five of the 30 London boroughs surveyed use TMOs to regulate parking on their estates. These include Hackney, Croydon, Barnet, Ealing and Southwark.

- 6.35. These councils have introduced TMOs on an estate-by-estate basis and only where there is demand. Authorities are obliged to implement a TMO only where consultation defines there is a majority supporting the proposal.
- 6.36. No borough currently has a blanket TMO covering all estates or all of its estates contained within local residential zones.
- 6.37. K&C, Wandsworth and Southwark are planning to implement a borough-wide approach. Southwark are rolling this out gradually whereas K&C and Wandsworth are proposing to implement a scheme on all estates at once.
- 6.38. In general the HRA has underwritten the cost risk in all TMO schemes.
- 6.39. All boroughs have funded the capital set up costs of the TMO schemes from the HRA. The borough-wide scheme in K&C is estimated to cost £205K for all estates.
- 6.40. **Option 3 – retain current arrangements**
- 6.41. The final option is to continue with the current arrangement and to have no enforcement on HRA land.
- 6.42. Five London boroughs have no estate parking enforcement, and a number of other boroughs have large proportions of their estate stock left without parking control. These boroughs are generally outer London boroughs where there is less demand for parking on estate roads or on the surrounding highways.
- 6.43. The principle benefits are that estate residents would have free parking and the council could wait for further clarity on the Protection of Freedoms Act (PoFA) and review the success of schemes in K&C, Southwark and Wandsworth before deciding how to move forward.
- 6.44. The dis-benefits include:
- 6.45. Parity of services: The majority of roads in the borough are controlled by traffic management orders. Only two, both near Wormwood Scrubs, are not controlled in some way. This option would also contradict the Council's aim to deliver tenure neutral neighbourhood services. Private residents would pay for parking permits while housing tenants and leaseholders receive a free and subsidised service. It may also lead to a displacement of parking from street to council housing estates by those who wish to avoid paying to park.
- 6.46. Loss of income: The council has an income target of £423k for parking in 2013/14 and this would not be met, leaving a gap in the HRA budget. The Council would still be required to maintain parking areas and road surfaces on estates, but without any related income.

6.47. Resident satisfaction: Resident dissatisfaction and complaints are increasing as knowledge of the lack of enforcement becomes more widely known, with use of estate parking by non-residents rising over time. Residents who currently pay for a bay to park are giving these up because controls are not enforced. Consultation highlighted general support for parking enforcement and this would also not be delivered.

6.48. **Recommended Proposals for Car Parking**

6.49. Further appraisal of options 1 and 2 is required to assess the viability and appropriateness in relation to the consultation feedback. It is recommended that the option of retaining the current arrangements is not sustainable or desirable in the long term.

7. **CONSULTATION**

7.1. Details of the potential garage and parking options were sent to every resident (tenant, leaseholder, and freeholder) and were posted on the Resident Involvement page of the Council's website. Two questions were asked about car parking in relation to charging policy and enforcement and two about garages also in relation to charging policy and management of the asset. Residents of Fulham and Lancaster Court estates were asked different questions about car parking because it was envisaged that a pilot arrangement to include the estates in the local Controlled Parking Zone (CPZ) would support the aim to deliver tenure neutral services and open up the estates to the surrounding neighbourhoods. The proposal for Fulham Court would complement the current Housing Estate Investment Programme for the Estate. It was also to gauge the appetite for this option among residents.

7.2. The consultation process was conducted in compliance with the statutory requirements placed upon the Council under s105 of the Housing Act 1985. The Housing Act requires the Council to consult with tenants who are likely to be substantially affected by a matter of housing management and the Council has an obligation to take due regard to the responses received. It is for this reason that Members are asked to note the outcome of the consultation.

7.3. A summary of the outcome of the consultation is detailed below: 15,040 letters were sent as part of the consultation and 635 responses were received, a 4.2% response rate. Of these 35 were emails, 61 telephone calls and 539 returned survey forms. White City Estate was excluded as a TMO was done in 2004 to allow for enforcement by Penalty Charge Notice.

7.4. Although disability information was not requested 54 residents advised us that they were disabled (8.5% of those that responded).

- 7.5. **Proposal 1 – to have a standard charge for a permit to park**
- 7.6. 366 (58%) people responded and commented on this proposal and 285 had no comment. Of those that commented 46% (168) supported the proposal and 54% (195) had objections, 85 people objected because they currently do not pay to park and do not want to pay, or they thought the charge was too high, 74 people rent an individual bay and want to retain it and 36 people just had a general objection to the proposal.
- 7.7. **Proposal 2 – Enforcement**
- 7.8. 187 people commented (30%) and 444 people had no comment. Of those that commented 82% (154) supported the proposal and 18% (33) had objections.
- 7.9. **Proposal 3 – Increase garage charge**
- 7.10. 151 (24%) of those that responded commented on this proposal, 480 did not comment. Of those that commented 97 (64%) supported the proposal and 54 (36%) had objections. Many of those that supported the proposal thought it was fair to charge more but did not want rates to reflect commercial charges, which they considered would be too high because of property valuation rates in the borough.
- 7.11. **Proposal 4 - Garage improvement**
- 7.12. 122 (20%) commented on this proposal and 509 (80%) did not comment. Of those that commented 105 of 122 (86%) supported the proposal and 17 (14%) had objections. Of those that objected many wanted improvements but did not want to pay especially if their garage was already in good condition.
- 7.13. **Fulham Court and Lancaster Court Estates**
- 7.14. 550 letters were sent and 36 (7%) responses were received of these seven made no comment.
- 7.15. **Fulham Court and Lancaster Court Estates: Proposal 1 - to include estates in local CPZ**
- 7.16. 29 commented on this proposal and of these 12 (41%) supported the proposal and 17 (59%) had objections, seven people did not comment on this proposal.
- 7.17. The main issue was from residents who pay for a bay and want to retain it. Many residents did not mind the charge. A few complained of additional traffic on the estate and their children's security. Many objected because of concerns about football fans parking on the estate on match days, consequently residents wanted enforcement until 8 or 9pm and at weekends on match days.

7.18. Fulham Court and Lancaster Court Estates: Proposal 2 – Enforcement

7.19. 34 (6%) commented on this proposal and of these four supported the proposal, no one had any objections and 30 did not comment.

7.20. Other consultation: TRA and Housing Forum meetings

7.21. In addition to this consultation exercise, officers also attended a number of Tenant Resident Association meetings and Forum meetings to discuss proposals and capture resident feedback. A summary of the feedback alongside officer comments is included in Appendix 6 of this report.

8. EQUALITY IMPLICATIONS

8.1. An EIA is attached with this report and is available electronically.

9. LEGAL IMPLICATIONS

9.1. The Regulation and control of the parking of vehicles on housing estates is part of the proper functions of a local authority in managing a housing estate under the Housing Act 1985 s.21(1). In addition, or alternatively it is conducive or incidental to a local authority's management of the houses of the estates within the Local Government Act 1972 s111.

9.2. As set out in the report the Council has a statutory obligation to consult with secure tenants and consider any representations made by them before making a decision.

9.3. Implications verified/completed by: Janette Mullins, Head of Litigation (telephone: 020 8753 2744)

10. FINANCIAL AND RESOURCES IMPLICATIONS

10.1. Viability studies to assess the cost of upgrading, disposal, redeveloping or changing the use of garages have yet to be carried out, but income from the asset base could be ring-fenced for improvement of garages that are financially sustainable to retain.

10.2. Income from the new garage arrangements in 2013/14 is predicted to be between £290k and £352k if the new arrangements are implemented by December 2013 (providing 4 months income), assuming a 10% void rate and the decommissioning of between 15% and 30% of current garage stock (following completion of the viability studies mentioned above). Income from the current garage arrangements will generate £528k for the first 8 months of the financial year based on a current void rate of 15%. Therefore, total predicted net income for 2013/14 is between £818k and £880k compared to a current budget of £845k.

- 10.3. Predicted garage income in 2014/15, assuming a void rate of 10% and the decommissioning of between 15% and 30% of current garage stock, is between £870k and £1.055m and should result in business plan HRA MTF5 targets being achieved.
- 10.4. Finance officers will be closely involved in monitoring and assessing the financial impact of the new garage charging policy and the policy covering the management, disposal and investment in the garage stock from inception and on an on-going basis.
- 10.5. Implications verified/completed by: Kath Corbett, Director, Finance and Resources - telephone: 020 8753 303.1

11. RISK MANAGEMENT

- 11.1. The report content sets out the risks associated with the proposed changes and contributes positively to the management of risk number two of the Enterprise Wide Risk Register, Managing the Business Objectives (public needs and expectations).
- 11.2. These risks can be summarised as:
 - High garage void levels until a programme of improvement is implemented.
 - Differing levels of demand than expected:
 - Higher demand for garages than capacity causing parking stress on surrounding streets.
 - Lower levels of demand will impact on budgeted income.
- 11.3. There will need to be sufficient time and resources made available for staff training and associated changes to information and communications technology applications.
- 11.4. A risk register will need to be prepared, to be managed within the project, to record additional risks identified in the report. This can also accommodate and escalate any emerging risks and issues as they arise

12. PROCUREMENT AND IT STRATEGY IMPLICATIONS

- 12.1. There are no specific procurement implications arising from this report.

LOCAL GOVERNMENT ACT 2000
LIST OF BACKGROUND PAPERS USED IN PREPARING THIS REPORT

No.	Description of Background Papers	Name/Ext of holder of file/copy	Department/ Location
	None		

LIST OF APPENDICES:

1. Garage Redevelopment Policy
2. Benchmarking of Garage Charges
3. Garage Use
4. Parking Schemes by Ward
5. London authorities parking arrangements
6. Responses to Consultation