

Transport and Environment Committee

10.00am, Thursday, 25 April 2024

Healthcare Worker and Carer Parking Permits

Executive/routine
Wards

Executive
All

1. Recommendations

- 1.1 It is recommended that the Transport and Environment Committee:
 - 1.1.1 Notes the engagement carried out with key stakeholders, including [VOCAL](#) and those currently using a Healthcare Workers' Permit (HWP), to gather views from both paid and unpaid carers on proposals to introduce parking permits to assist them in their duties and the information gathered from other Local Authorities;
 - 1.1.2 Approves the recommendations set out within this report in regard to: Eligibility Criteria for each permit type; the duration of stay and the proposed permit prices;
 - 1.1.3 Notes that the terms and conditions of all permit schemes will be governed by a Traffic Regulation Order (TRO);
 - 1.1.4 Approves the start of the TRO process to make the changes to the HWPs; and
 - 1.1.5 Approves the start of the TRO process to introduce Carers' parking permits.

Paul Lawrence

Executive Director of Place

Contact: Gavin Brown, Head of Network Management and Enforcement

E-mail: gavin.brown@edinburgh.gov.uk

Healthcare Worker and Carer Parking Permits

2. Executive Summary

- 2.1 This report updates Committee on the results of the engagement on potential changes to the Council's Healthcare Workers' Permit (HWP) and on the proposed introduction of Carers' parking permits. The report seeks approval to commence the necessary legal processes to proceed with changes to the HWP and to introduce two new permit types for Carers.

3. Background

- 3.1 In December 2020, the Council approved a [motion](#) which sought to examine the feasibility of implementing parking support for carers.
- 3.2 The motion was addressed in a [report](#) to the Transport and Environment Committee in November 2021.
- 3.3 The November 2021 report identified where the HWP scheme could be improved and modernised and set out how new permit schemes for both paid and unpaid carers could work.
- 3.4 A further report was provided to Committee on 7 March 2024 where Committee agreed that an amended report should come back to the Committee meeting on 25 April to allow officers to investigate issues raised in amendments submitted and allow further consideration on hours suggested, costs for each permit type and funding for the scheme and visit durations. The report should also include which issues would be covered by the policy and which issues would be covered in Traffic Regulation Order (TRO).
- 3.5 The following amendments were also approved by Committee on 7 March 2024 and are addressed within this report:
- 3.5.1 A follow up report to Committee when the first full year's operation of the new permit types has concluded and the data relating to that first year of operation is available. This report will cover: feedback gathered from unpaid carers' groups, care providers, and trade unions on the operation of the new permits over that first year and levels of uptake of the new types of permit;

- 3.5.2 Information on how we engage with key stakeholders and others mentioned, to determine what changes can be made to public transport provision that would make using Lothian Buses or Edinburgh Trams more attractive, affordable and accessible than a private car.
- 3.5.3 Information on the feasibility of introducing concessionary travel for healthcare workers, paid carers and unpaid carers – through City of Edinburgh issued National Entitlement Cards for example.
- 3.5.4 This information to be shared in a Business Bulletin update by June 2024's Committee meeting.

4. Main report

- 4.1 In considering the proposed approach to supporting healthcare workers, paid carers (who are currently not eligible for an HWP) and carers who are not formally employed by an organisation or who are volunteers (unpaid carers), it is important to recognise the distinction between these types of healthcare professionals and how their needs vary.
- 4.2 Therefore, the proposals outlined below suggest retaining the HWP for NHS employed staff with expanded eligibility criteria to include a limited number of registered charitable organisations who offer complementary support to NHS services (such as the expertise provided by specialist cancer nurses).
- 4.3 In addition, it is proposed to introduce two new permits to cover both paid and unpaid carers. First, a Professional Carers' Permit for employed or paid for carers and secondly, a Personal Carers' Permit (such as) for those providing unpaid care to family or friends.

Engagement Feedback

Healthcare Workers' Permit (HWP)

- 4.4 In addition to the changes identified in the report from November 2021, respondents were asked about the cost of an HWP, the duration of stay period, the terms and conditions of use and the format of the permit.
- 4.5 Regarding cost, most respondents indicated the existing price, set at £10, was about right. However, data from an earlier benchmarking exercise found that the fee for an HWP in Edinburgh was low in comparison to other Local Authorities (LAs)
- 4.6 The current £10 charge for an HWP is approximately 2.5% of the cost of a Business Permit in Edinburgh, whereas in other LAs, healthcare permit costs were equivalent to c. 13% of the cost of business permits (which would equate to over £50 in Edinburgh).
- 4.7 The price of a HWP has not changed since 2008, thus such an increase in permit price may be considered too great by current users. Therefore, taking into account the positive changes and benefits being suggested for the scheme and its users, it is proposed to increase the price of a HWP to £25.00.

- 4.8 This price should ensure that all administrative costs of running the scheme are covered. It is not expected to generate any surplus revenue for the Council.
- 4.9 Currently, the HWP allows for a two-hour maximum stay in one location. Feedback was split on this, with just over half of respondents indicating this was the right amount of time but a similar number suggesting that two hours was too short to carry out their duties.
- 4.10 Therefore, it is proposed to extend the maximum stay duration for the HWP to four hours to ensure that all HWP users have sufficient time to complete their domiciliary visits.
- 4.11 Many respondents said they were confused by where and when they could park whilst using their HWP. For example, the permit can be used to park in pay and display and shared use parking places in all zones except the Central Zones (Zones 1 to 4). This means healthcare workers always need to correctly identify which zone they are parking in and ensure the HWP is valid in that zone which is an additional unnecessary burden.
- 4.12 Therefore, it is proposed to allow all HWP holders to park in pay and display and shared use parking places in all zones, including the Central Zones. This will deliver consistency and reduce confusion.
- 4.13 In addition, changes will be made to allow permits to be used in permit holder parking places within Priority Parking Areas (PPA) due to the scarcity of yellow lines and public parking places in these areas.
- 4.14 These improvements to the HWP will benefit permit holders, with more parking places being made available to them.
- 4.15 HWPs are currently issued in a paper format. All respondents wanted to retain this current format and due to the conditions in place (such as the requirement to set a clock on arrival and the fact the permit is intended to be shared between users) it is recommended to retain the permit in its current format.

Carers' Permits

- 4.16 Research from the benchmarking exercise showed that most comparable LAs allowed a wider range of possible users for their versions of a HWP than are included in Edinburgh's current criteria.
- 4.17 The most common category of permit issued by the other authorities is a Carer Permit. As care is not always provided by an NHS healthcare worker, some carers may feel disadvantaged when it comes to parking within the Controlled Parking Zones (CPZ).
- 4.18 The consultation results demonstrated that both paid (97%) and unpaid (90%) carers were interested in the introduction of a Carers' Permit.
- 4.19 As outlined in the November 2021 report, it is therefore proposed to proceed with the introduction of a Professional Carers' Permit and a Personal Carers' Permit.

4.20 To prevent unnecessary uptake of permits that could potentially encourage the use of private cars within Edinburgh and adversely affect delivery of the City Mobility Plan, permits issued will be limited by relevant eligibility criteria with the aim to support those who most need additional parking support.

Professional Carers' Permit

- 4.21 The eligibility criteria for this permit type was set out in the November 2021 report.
- 4.22 The Permit would be available to applicants who can demonstrate proof of providing care in the community. This would include the requirement to provide an employer/work ID card, from a relevant care providing organisation, to identify the individual along with a letter, signed by their employer confirming they undertake domiciliary visits and their requirement for a permit.
- 4.23 The Permit would be valid in all CPZs and PPAs in Edinburgh and would allow holders to park for up to a maximum of four hours in pay and display, shared use and permit holders parking places.
- 4.24 The benefits available from the proposed Professional Carers' Permit are comparable with the Council's other parking permit schemes and therefore it is proposed to price these permits in a similar manner to the Trades parking permit, which is charged at £1,611.40 per annum from 2024/25.
- 4.25 To reflect the fact the Professional Carers' Permit can be used at multiple locations throughout the day (although each stay is limited to a four-hour maximum per location), it is proposed that the Permit should be priced at £750 per year. The cost of these permits can be reviewed annually as part of the Council's budget setting process each year.
- 4.26 As this permit type will only be available to employed professionals, the cost is not considered unreasonable and is in keeping with the findings from the benchmarking exercise. The permit will be issued to an organisation, or self-employed Professional Carer, and a number of vehicles can be registered to use the permit (although only one vehicle can park at any one time). There is no maximum number of permits that can be purchased. This means a sufficient number of permits can be purchased by organisations and distributed to staff who may need them on a particular day.
- 4.27 Applications for this permit type can be managed by the Council's existing permit management system, with proof of eligibility forming part of the application process.
- 4.28 This permit will be transferrable between vehicles belonging to staff employed by the organisation. All vehicles that are to be associated with the permit must be registered on the permit account. Self-Employed Carers must supply proof that the vehicle is owned or leased to them. The permit has a maximum stay allocation and is proposed to be issued in paper format with an adjustable clock. However, it is recommended that the TRO is drafted such that it allows the permit to be issued in any format should feedback from users support a change to an electronic version.

Personal Carers' Permit

- 4.29 This permit would be available to applicants who can evidence that they receive Department of Work and Pensions (DWP) Carers' Allowance or Carers' Credit.
- 4.30 The Permit would be valid for use within shared use and permit holders parking places within a single zone or PPA in which the cared-for person resides.
- 4.31 This permit will offer similar parking benefits to a residential parking permit, thus it is proposed that the Personal Carers' Permit is priced at a similar level.
- 4.32 [Residents' permit prices](#) are based on the zone or PPA for which they are applying and on the CO2 emissions or engine size of the vehicle and are subject to a diesel surcharge, with exactly the same approach being proposed for the Personal Carers Permit.
- 4.33 The price of a permit will be reviewed annually in line with the Fees and Charges agreed by the Council each year as part of the budget setting process.
- 4.34 Only one permit will be issued for the cared-for persons address, however a maximum of two vehicles can be registered to use the permit. This is known as a merged permit. In the case of a merged permit, only one registered vehicle can use the permit at a time. The permit must be switched between vehicles, depending on which one needs to park. This can be done quickly and easily via the online account. Prices for merged permits will be based on the vehicle with the higher CO2 emissions or engine size band.
- 4.35 The carer(s) must supply evidence to prove they own or lease the vehicle for which they are applying. There will be no maximum stay imposed on this permit type which means that carers can spend as much time with their family or friend as required.
- 4.36 Applications for this permit type can be managed by the Council's existing permit management system, with proof of eligibility required as part of the application process.
- 4.37 As it is proposed to issue this permit in a similar way to a Residents' Permit, it will be issued in an electronic format. This means that permit validity will be available for Parking Attendants to verify on their handheld devices.

Permit Terms and Conditions

- 4.38 The TRO will govern all elements of the proposed permit schemes, including where the permits can be used for parking and elements such as permit pricing, permit allocations, eligibility and maximum stay periods.

5. Next Steps

- 5.1 If Committee approves the recommendations set out in this report, officers will commence the necessary legal process to make changes to the HWPs and introduce Carers' parking permits.

- 5.2 Council officers will continue to follow up on Committee's request to review accessibility on Edinburgh Tram and Lothian Buses along with National Entitlement Card eligibility for carers. An update on this will be provided in the Business Bulletin for Committee in June 2024.
- 5.3 A follow up report will be submitted to Committee after the first year of operation of the new permit types and will provide relevant data, for instance on permit uptake and feedback from users, such as: unpaid carers' groups, care providers and trade unions.

6. Financial impact

- 6.1 Costs associated with the next steps of this process, including TRO processes, will be met from within the existing Council budget for 2024/25.
- 6.2 There may also be costs associated with developing the permit management software to add new permit types, process applications and payments and costs associated with the stationery and printing associated with the Professional Carers Permit.
- 6.3 It is currently estimated that all costs for enforcement and delivery of the service will be covered by income generated by the sale of the new permit types.
- 6.4 Permit income will be monitored, with a view to minimising costs to help carers where possible, however there is unlikely to be any surplus generated. All parking permit income is ring-fenced to fund the delivery of parking operations and enforcement services, the cost of which currently exceeds the value of permit income.

7. Equality and Poverty Impact

- 7.1 All of the [Integrated Impact Assessments](#) relating to the Council's Parking Action Plan and associated projects can be found on the Council's website.
- 7.2 An IIA has been drafted for the amendments to the HWP and introduction of Carers' permits. This concluded the changes would be mainly positive to help carers park closer to their destination and allow people to stay in their own homes with the care provision they require.

8. Climate and Nature Emergency Implications

- 8.1 As a public body, the Council has statutory duties relating to climate emissions and biodiversity. The Council

“must, in exercising its functions, act in the way best calculated to contribute to the delivery of emissions reduction targets”

(Climate Change (Emissions Reductions Targets) (Scotland) Act 2019), and
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“in exercising any functions, to further the conservation of biodiversity so far as it is consistent with the proper exercise of those functions”

(Nature Conservation (Scotland) Act 2004)

- 8.2 The City of Edinburgh Council declared a Climate Emergency in 2019 and committed to work towards a target of net zero emissions by 2030 for both city and corporate emissions and embedded this as a core priority of the Council Business Plan 2023-27. The Council also declared a Nature Emergency in 2023.

Environmental Impacts

- 8.3 There is a concern that new parking permits may make parking easier and encourage unnecessary private car travel. Therefore, strict eligibility and price controls are required to manage demand and ensure permits are only used by those who need them and currently use a vehicle to undertake their caring duties. This will minimise the impact on the climate and support the Council's City Mobility Plan, Net Zero ambitions and allow cared for people to stay in their own homes for longer.

9. Risk, policy, compliance, governance and community impact

- 9.1 These proposals have been discussed with key stakeholders as part of a consultation which ran from 6 March until 30 April 2023. The survey received 554 responses in total.
- 9.2 Respondents were given the opportunity to complete an online survey to share their views on the HWP and proposals to introduce two new carer permits.
- 9.3 Stakeholders from GP surgeries, community and healthcare organisations were also invited to book a virtual meeting with our independent project team to share their feedback and to ask questions about the project and consultation. A total of six meetings took place between 22 and 28 March 2023.

10. Background reading/external references

- 10.1 [Healthcare Worker and Carer \(Parking\) Permits](#) reported to the Transport and Environment Committee on 11 November 2021
- 10.2 [Controlled Parking Scheme - Edinburgh Healthcare Worker's Parking Permits](#) reported to the Transport, Infrastructure and Environment Committee on 29 July 2008.
- 10.3 [Controlled Parking Scheme - Update on Edinburgh Healthcare Workers' Permits](#) reported to the Transport, Infrastructure and Environment Committee on 25 November 2008.

11. Appendices

None.