

REQUEST FOR DIRECTOR DECISION – DD2769

London Borough of Harrow request to change the penalty charge notice levels for parking contraventions

Executive summary:

The London Borough of Harrow (LB Harrow) has asked the GLA to approve its proposal for the level of charges for penalty charge notices (PCNs) for on-and off-street parking contraventions on borough roads in LB Harrow to change from Band B charges to Band A charges. The change to Band A would mean increasing the charge for more serious contraventions from £140 to £160; and for less serious contraventions, from £90 to £110. If approved, the Band A charges would apply uniformly throughout the entire borough.

LB Harrow presented this proposal to London Councils, which approved the request and submitted it to the GLA for approval. This submission included the results of LB Harrow's consultation, in which around a third of respondents agreed with the proposal to increase PCN levels. Consideration of such borough requests was delegated to the Executive Director of Good Growth under MD3328. If the proposal is approved, the Secretary of State for Transport must be notified, in writing, of the proposal; and has up to one month to raise any objections.

Decision:

That the Executive Director of Good Growth (exercising powers delegated to him by the Mayor under cover of MD3328) approves the proposal for the level of charges for PCNs for on and off-street parking contraventions on borough roads in the LB Harrow to change from Band B charges to Band A charges; and notifies the Secretary of State for Transport, in writing, of the proposed change.

AUTHORISING DIRECTOR

I have reviewed the request and am satisfied it is correct and consistent with the Mayor's plans and priorities.

It has my approval.

Name: Philip Graham

Position: Executive Director, Good Growth

Signature:

Date: 12/1/2026



PART I – NON-CONFIDENTIAL FACTS AND ADVICE

Decision required – supporting report

1. Introduction and background

- 1.1. As noted in the London Plan, parking policy can have significant effects in influencing transport choices and addressing congestion. Parking enforcement is required to ensure that the objectives of local parking policies are being achieved.
- 1.2. Further to a delegation from London boroughs, London Councils' Transport and Environment Committee (TEC) is responsible, subject to approval by the Mayor and subject to the Secretary of State for Transport (the Secretary of State) not raising any objections, for setting certain parking charges on borough roads. The Mayor delegated consideration of such borough requests to the Executive Director of Good Growth under MD3328.
- 1.3. These parking charges include:
- penalties for contraventions of parking regulations, including any surcharges or discounts
 - release of a vehicle from a wheel clamp
 - removal of a vehicle from the street
 - vehicle storage charges and disposal fees.
- 1.4. The current penalty charges for on and off-street parking contraventions in Greater London, as implemented from April 2025, are shown in the table below. Higher-band penalties apply to contraventions that are considered more serious – such as parking on yellow lines or causing an obstruction. Lower-band penalties generally apply where parking is permitted, but the regulations have been contravened – such as overstaying on a pay-and-display bay.

	Higher band	Lower band
Band A	£160	£110
Band B	£140	£90

- 1.5. Band A areas have traditionally been concentrated in Central London and urban centres, where the pressures on parking and congestion are often greatest. Band B areas have historically been concentrated in outer London, where pressures on parking tend to be less significant. Due to issues with non-compliance, some outer London authorities have become Band A areas.
- 1.6. Pursuant to a report dated 1 May 2024 from the London Borough of Harrow (LB Harrow), TEC put forward a proposal to introduce Band A charging for PCNs on borough roads in LB Harrow. London Councils considered this request and wrote to the Mayor on 3 June 2024, seeking his approval to change the current charges from Band B to Band A. For reasons related to the consultation on LB Harrow's proposal, its 2024 application was not progressed.
- 1.7. Instead, a further separate application was made by LB Harrow via TEC in a report dated 18 November 2025, seeking approval for LB Harrow to introduce Band A level charging for PCNs on borough roads in LB Harrow. This application followed LB Harrow running a further separate public consultation on this proposal. TEC considered LB Harrow's report on 4 December 2025 and wrote to the GLA on 9 December 2025 to request the GLA's approval of the proposal. Appendix 1 to this Decision is a letter from London Councils requesting the GLA's approval of the LB Harrow's proposed band change. Appendix 2 contains the supporting TEC report, which appends the LB Harrow's request to TEC along

with LB Harrow's materials consulting on the proposal, a summary of the outcome of its consultation and its Equality Impact Assessment.

- 1.8. Paragraph 4 of Schedule 9 to the Traffic Management Act 2004 (TMA 2004) provides that the Secretary of State for Transport must be notified of the levels of charges, should a change be proposed. The revised charges shall not come into force until at least one month after the notification date, or earlier if the Secretary of State so allows. The Secretary of State may, before the end of that period, give notice that they object to the charge levels because some or all of them are excessive. If they do so, those charge levels shall not come into force unless and until the objection has been withdrawn. If the Secretary of State thinks the level is excessive, they may make regulations setting the charge levels. A proposed draft of the letter to be sent to the Secretary of State is included at Appendix 3.

2. Objectives and expected outcomes

- 2.1. As stated in LB Harrow's report to TEC, the reason for seeking to change charging levels in the borough, from Band B to Band A, is to help improve compliance with essential traffic and parking management measures. Despite deploying a robust parking and traffic enforcement regime, the borough has seen a rise in non-compliance with parking regulations.
- 2.2. Granting the request would mean the whole borough is subject to Band A charges. However, Band B charges will still apply on roads bordering other boroughs where Band B charging levels apply, and where signage does not exist to mark the boundary. LB Harrow has boundaries with three Band A authorities (LB Barnet, LB Brent and LB Ealing) and one Band B authority (LB Hillingdon; boundary roads with this borough will continue to be enforced as Band B). The borough also shares boundaries with the Hertfordshire districts of Three Rivers and Hertsmere to the north. The TEC report notes that the same policy will be applied to these, as to those in adjoining London boroughs.
- 2.3. Further information was provided in LB Harrow's report addressed to London Councils (Appendix 2, part B) and is summarised below:
 - LB Harrow's civil parking enforcement seeks to manage traffic and improve the quality of public transport; improve road safety and the local environment; and manage demands for kerb space. Since 2015, the use of CCTV has been deregulated for most parking contraventions across London. As a result, LB Harrow has invested in more robust on-street parking enforcement; but non-compliance has continued to grow.
 - LB Harrow has provided a breakdown of parking PCNs. This shows a small decrease in the total number of parking PCNs between 2018-19 (104,547) and 2023-24 (102,327). However, the number of PCNs has increased consistently overall since the COVID pandemic. In 2024-25, 118,055 PCNs were issued – exceeding, for the first time, the number reached in 2018-19 (by 13,000). This also exceeded the number in the previous year, 2023-24, by 15,700 (a 15 per cent increase).
 - On 7 April 2025 LB Harrow began issuing Band B charges at a higher level, following changes to the London-wide charging regime set by London Councils and approved by the Mayor in MD3289. However, this failed to address the increase in parking PCNs across the borough. In 2025, the overall parking PCNs issued per month was higher than in 2024: data showed an average increase of approximately 10 per cent in the five-month period from May to September 2025 (the latest data available when the report was prepared for London Councils), compared with the same period in 2024.
 - Between 15 September and 26 October 2025, LB Harrow conducted a second consultation on the proposals. Half of respondents agreed that further action from LB Harrow is required to discourage illegal parking offences. However, 62 per cent opposed LB Harrow's proposal to change the parking band level from Band B to Band A.

- The consultation responses noted that enforcement is needed in the borough, with LB Harrow's report noting: "It is clear from our consultation responses, that there is a general consensus that more could be done to improve parking behaviours." The borough notes that, although it has deployed significant additional civil enforcement (and reviewed this deployment), there are still particular areas of concern that have not been successfully tackled.
- The borough acknowledges that the consultation lacked a majority supporting the proposals to change the band level. It concluded:

"In the absence of suitable alternatives, the implementation of Band A penalty charges will act as an effective and appropriate method to improve compliance and will address the fact that more needs to be done to promote good parking practices."
- LB Harrow noted that three bordering boroughs (LB Barnet, LB Brent and LB Ealing) are already Band A boroughs. LB Hillingdon (the fourth bordering borough) is a Band B borough. LB Harrow consulted all four boroughs. The TEC report notes that none raised any objections to their proposal.

2.4 LB Harrow is of the view that:

- making no changes to the current penalty charge level is inconsistent with its policy objective of successfully managing road traffic in Harrow
- the current levels are too low.
- the increase to Band A charges will align with charges in place on the Transport for London Road Network; and in the adjoining boroughs of Barnet, Brent and Ealing (which have been Band A boroughs since 2020). The increase in charge levels (16.7 per cent) would make them consistent with these other enforcement authority areas. The low level of the increase could also have a lesser detrimental impact on payment and recovery rates. Taking these factors into account, Harrow is of the view that the proposal to re-band to Band A achieves compliance with the Statutory Guidance "that enforcement authorities should adopt the lowest charge level consistent with a high level of acceptability and compliance".

3. Equality comments

- 3.1 Under section 149 of the Equality Act 2010 (the Equality Act), the GLA must have due regard, when making a decision, to the need to eliminate unlawful discrimination, harassment and victimisation any other conduct prohibited by or under the Act; and to advance equality of opportunity, and foster good relations, between people who share a protected characteristic and those who do not. Protected characteristics under the Equality Act are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage or civil partnership status (the duty in respect of this last characteristic is to eliminate unlawful discrimination only).
- 3.2 In considering the matters set out in section 149 of the Equality Act, the GLA should take into account the Equalities Analysis and information provided by LB Harrow. LB Harrow undertook an Equality Impact Assessment (EIA) (included at Appendix 2: part B, iv) and found no potential for unlawful conduct or disproportionate impact. The EIA found some positive impacts for older people, younger people, and people with disabilities, who – where they are bus passengers and pedestrians, as is more likely for these groups – would benefit from greater compliance with restrictions.
- 3.3 LB Harrow considers that the proposal will have no negative impact on those with protected characteristics. However, its analysis notes possible positive impact on those with the following protected characteristics:

- Age: children and the elderly are more likely to be bus users; this group will see improvements as parking compliance improves.
- Disability: wheelchair users and those with mobility difficulties could benefit from a reduction in footway parking contraventions.
- Race/ethnicity: people with this protected characteristic are more likely to be pedestrians and bus users, so may see benefits as parking compliance improves.
- Religion or belief: People sharing this protected characteristic may benefit when visiting places of worship, as compliance with parking restrictions improves and parking availability improves.
- Sex: women are more likely to be pedestrians or bus users, and may see improvements as parking compliance improves.

3.4 Income is not a protected characteristic; however, age, disability and race are strongly linked to having lower incomes. The impact of the increased parking-related fees is mitigated by the following:

- a PCN is only issued to motorists that have failed to follow the parking regulations, and will be reduced by 50 per cent if paid within 14 days
- a motorist has the right to appeal a PCN to an independent adjudicator if they feel it was unfairly issued.

3.5 While not raised in LB Harrow's EIA or the consultation, it is possible that people with some protected characteristics may be more likely to incur penalty charges than others. For example, older people are more likely to have cognitive impairments from diseases such as dementia or Alzheimers; and so are more likely to make a mistake that incurs a penalty charge. The same is potentially true of disabled people with learning disabilities or autism; and of ethnic groups whose first language is not English. Older people and some other protected groups may also be more likely to experience difficulty, and incur a penalty charge at any locations where it is only possible to pay by mobile devices or apps. It is considered that these potential issues can be suitably mitigated, including through:

- the 50 per cent discount for early payment
- the ability to make representations to the issuing authority to cancel PCNs that have been improperly issued
- ultimately, recourse to a tribunal to appeal the decision, and have the opportunity for the charge to be cancelled.

4. Other considerations

Key risks and issues

4.1. Officers have reviewed LB Harrow's proposal, including analysing its consultation materials, the responses to the consultation, and the LB Harrow's EIA.

Links to Mayoral strategies and priorities

4.2. As noted in the London Plan, parking policy can have significant effects in influencing transport choices and addressing congestion. Parking enforcement is required to ensure that the objectives of local parking policies are being achieved.

4.3. The Mayor's Transport Strategy seeks to discourage unnecessary car journeys. Parking policy changes may help to discourage car use.

Impact assessments and consultations

- 4.4. As required, LB Harrow presented its proposal to TEC.
- 4.5. Should the Executive Director approve the application by LB Harrow, he will be required to notify the Secretary of State of the charge levels (a draft letter is included as Appendix 3).
- 4.6. Between 15 September and 26 October 2025, LB Harrow conducted a consultation on the proposals; this received 690 responses. Half of respondents agreed that further action was needed by the council to improve parking behaviours. However, 62 per cent of respondents opposed the specific proposal to change from Band B to Band A to discourage parking offences. Approximately 30 per cent were in favour of the proposal. Having considered the responses, the borough concluded:

“In the absence of suitable alternatives, the implementation of Band A penalty charges will act as an effective and appropriate method to improve compliance and will address the fact that more needs to be done to promote good parking practices.”

Conflicts of interest

- 4.7. There are no conflicts of interest to declare from any of those involved in the drafting or clearance of this Decision Form.

5. Financial comments

- 5.1. There are no direct financial consequences for the GLA arising from this decision.

6. Legal comments

- 6.1. Paragraph 2 (1) (b) of Schedule 9 of the TMA 2004 provides that it is the duty of London local authorities to set the levels of charges relating to contraventions on, or adjacent to, roads other than GLA roads. Paragraph 2 (2) provides that different levels of charges may be set for different areas in London, and for different cases or classes of cases.
- 6.2. Paragraph 3 (1) of Schedule 9 provides that London local authorities must submit to the Mayor, for approval, the levels of charges that they propose to set. This request, in respect of LB Harrow, is set out at Appendices 1 and 2. In MD3328, the Mayor has delegated to the Executive Director of Good Growth the functions conferred on the Mayor under the TMA 2004, Schedule 9, Part 2, paragraph 3(1) of approving changes proposed by the London local authorities to the level of parking penalty charges on borough roads. Accordingly, the Executive Director of Good Growth has delegated authority to make the decision requested of them in this Decision.
- 6.3. If the Executive Director approves the levels of charges, paragraph 4 of Schedule 9 provides that the Secretary of State must be notified of the levels of charges so approved. The levels of charges shall not come into force until at least one month after the notification date, or earlier if the Secretary of State allows. The Secretary of State may, before the end of that period, give notice that they object to the charge levels on the grounds that some or all of them are excessive. If they do so, those charge levels shall not come into force unless and until the objection has been withdrawn. If the Secretary of State thinks the level is excessive, they may make regulations setting the level of charges.
- 6.4. The Executive Director must:
 - take into account the reasons provided by LB Harrow and London Councils, having read all the papers provided with this report
 - comply with the Public Sector Equality Duty, when considering this proposal. In this regard, the Executive Director is referred in particular to section 3 of this Decision, above.

7. Planned delivery approach and next steps

Activity	Timeline
LB Harrow recommendation considered by the Executive Director	January 2026
Letter to Secretary of State, if approved	January 2026
Secretary of State for Transport review period	One month from the date of the Executive Director's letter
LB Harrow implement increased charges	After Secretary of State review period (proposed March 2026)

Appendices and supporting papers:

- Appendix 1: Letter from London Councils requesting approval of Harrow's band change
- Appendix 2: TEC report, appended with LB Harrow's request to TEC (labelled report appendix 1) which includes:
 - consultation summary (labelled report appendix A1)
 - consultation materials (labelled report appendix A2)
 - CPZ map (labelled report appendix B)
 - Equality Impact Assessment (labelled report appendix C)
- Appendix 3: Draft letter to the Secretary of State

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will be published either within one working day after it has been approved or on the defer date.

Strategic Programmes

Does this decision seek approval for activity falling within the remit of a programme delivery plan? NO

Part 1 – Deferral

Is the publication of Part 1 of this approval to be deferred? NO

Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under the FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form? NO

ORIGINATING OFFICER DECLARATION:

Drafting officer to confirm the following (✓)

Drafting officer:

Claire Hamilton has drafted this report in accordance with GLA procedures and confirms the following:

✓

Assistant Director/Head of Service:

Elliot Treharne has reviewed the documentation and is satisfied for it to be referred to the Sponsoring Director for approval.

✓

Financial and Legal advice:

The Finance and Legal teams have commented on this proposal, and this decision reflects their comments.

✓

Mayoral Delivery Board

A summary of this decision was reviewed by the Mayoral Delivery Board on 12 January 2026.

CHIEF FINANCE OFFICER:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

Signature

Date: 12/1/2026

