FINANCE COMMITTEE CALL FOR EVIDENCE

DISABLED PERSON’S PARKING BADGES (SCOTLAND) BILL: FINANCIAL MEMORANDUM

SUBMISSION FROM STIRLING COUNCIL

Did you take part in the consultation exercise which preceded the Bill and, if so, did you comment on the financial assumptions made?
1. Stirling Council Officers responded to the consultation, dated Dec 2012, in February 2013. This included a response to a general question related to financial implications. Stirling Council Officers also responded to the consultation “Call for Evidence - Potential Extension to Eligibility Criteria” in December 2013.

Do you believe your comments on the financial assumptions have been accurately reflected in the FM?
2. The FM recognises that there are additional costs associated with enforcement and administering a statutory review process. However it does not reflect that, for many small local authorities, there is no business case for introducing decriminalised parking enforcement (DPE). The current proposals from Police Scotland to withdraw Traffic Wardens, means that Stirling Council will be required to introduce DPE as soon as possible. However DPE is unlikely to be cost neutral.

Did you have sufficient time to contribute to the consultation exercise?
3. Yes

Costs

If the Bill has any financial implications for your organisation, do you believe that they have been accurately reflected in the FM? If not, please provide details.
4. The FM recognises that the Bill will result in additional duties and responsibilities being placed on Local Authorities, which in turn will result in additional costs.

Do you consider that the estimated costs and savings set out in the FM are reasonable and accurate?
5. The FM includes information on the direct annual costs for employing an enforcement Officer, which seem reasonable. However, it does not include the overall costs to small local authorities of establishing and operating DPE. No consideration is given to overhead costs including software, hardware, accommodation, transport, uniforms, line management, training etc.

If relevant, are you content that your organisation can meet the financial costs associated with the Bill which it will incur? If not, how do you think these costs should be met?
6. As there are significant margins of uncertainty around the overall costs for enforcement it is not possible to predict if the Council will incur additional costs related to this part of the Bill. Regarding the establishment of a formal review process, as we already have a review process in place, I consider we will be able to
update our process to accord with the legislation without incurring any significant additional costs.

7. If there are any additional costs, these could be met by raising the maximum allowable charge for a blue badge, currently £20.

*Does the FM accurately reflect the margins of uncertainty associated with the estimates and the timescales over which such costs would be expected to arise?*

8. Costs directly associated with the Bill are reasonably captured. Indirectly associated costs, related to DPE are not.

**Wider Issues**

*Do you believe that the FM reasonably captures costs associated with the Bill? If not, which other costs might be incurred and by whom?*

9. The FM does not reflect the margins of uncertainty of the wider issues related to the costs of establishing DPE.

*Do you believe that there may be future costs associated with the Bill, for example through subordinate legislation? If so, is it possible to quantify these costs?*

10. Response to previous questions refer.