



Parks and Greenspaces Policy Pack

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Introduction

This document seeks to codify current working policies and practices in parks. Whilst the policy position is set out to give park users a clear position on a range of issues there may still be further work to complete to empower officers to enforce the policies under relevant legislation.

Each policy position statement has been built up by careful review of the context around the issue, practice elsewhere, and legal position.

The policy position statements all have proposed review frequencies and a next scheduled review date. It may be the case that a review is required sooner than the date indicated.

Once a policy position has been reviewed the agreement of the relevant Cabinet Member will be sought to approve the revised policy position if one is proposed.

At present there are 17 policy areas set out. Over time more will be added. Policies will be updated to reflect changes in thinking, legislation, and best practice.

Name	Barbecues and fires in parks and greenspaces
Policy ref no.	PGSS1
Date adopted	TBA (March 2023)
Review frequency	Initially annually
Next scheduled review date	December 2023 (annually)
Policy position	<ul style="list-style-type: none"> • BBQs are not permitted in any park or greenspace under the management of Haringey Council (unless they are part of a permitted event authorised under the Outdoor Events Policy) • Open fires (including bonfires and braziers) are not permitted in any park or greenspace under the management of Haringey Council. This applies to Council staff and their contractors as well as to park users • Sky lanterns must not be launched from any park or greenspace • Fireworks must not be launched from any park or greenspace (unless part of a permitted event authorised under the Outdoor Events Policy) • Bonfires and barbecues are permitted on Council allotments provided they comply with the existing guidance on good practice and safety
Definitions	<p>For the purposes of this policy a barbecue (BBQ) is any method of grilling/cooking food. It includes disposable foil BBQs and portable/reusable BBQs and includes both charcoal/coal and gas fired BBQs.</p> <p>Open fires (including bonfires, braziers and fire pits) are also the subject of this policy document, whether or not used for cooking.</p> <p>Sky lanterns (sometimes called “Chinese lanterns”) are usually made of paper with a wire or bamboo structure and ‘float’ by means of an open flame burning within.</p>
Context	<p>The Council recognises that a lot of residents without a garden would like the opportunity to have a barbecue. For many the local park seems like a suitable location, especially if they see others having barbecues in the park.</p> <p>Barbecues have proved very popular where permitted in parks by other local authorities, but they bring their own problems including:</p> <ul style="list-style-type: none"> • litter and the additional cost of litter clearance • damage to park furniture and grass • risk of burns to people or dogs • risk of larger fires (of vegetation, bins etc)

- smoke and carbon particulates emitted by barbecues
- smells that can be offensive to some park users

Haringey Council has not previously had a written policy on BBQs but the custom and practice has been to say that BBQs are not permitted. Signs to this effect have been displayed in several parks, but last summer BBQs could regularly be seen in Haringey parks at the weekends. Little enforcement action has been taken in recent years due to budget cuts and a lack of capacity within the enforcement team.

During summer months park operations staff can regularly point to the excess litter generated by such BBQs that are not cleared up, and even bagged waste is often ripped open by foxes who can smell the meat/bones within. Burn damage to parks furniture from disposable barbecues is common as are scorch marks on the grass. There is also a risk of summer grass fires that can become serious incidents.

Practice elsewhere

Most London boroughs do not permit BBQs in their parks. The general resistance to BBQs amongst councils is primarily a combination of food waste and litter, damage to grass and tables/benches (from portable BBQs) and a concern about fire risk. None of these objections appears insurmountable. Concerns about smoke, particulate pollution and intrusive or (for some) offensive smells (especially if meat and perhaps significantly pork is being cooked) are much more difficult to mitigate.

However, the experience in London Fields (which is managed by Hackney Council) is relevant. BBQs had been permitted on London Fields. It became a very popular destination for people - not just a few locals - wanting to have BBQs. The popularity of the park resulted in vast amounts of waste and damage to the park and anti-social behaviour from loud music to public urination. The Council calculated that the additional cost of managing litter, damage and enforcement was £200,000. Their response was to ban BBQs in London Fields in 2019.

In 2019 Camden Council responded to a similar problem by restricting BBQs to two areas in Waterlow Park away from the main meadow and the facilities at Lauderdale House. At the time of writing (June 2021) barbecues are not permitted anywhere in Camden.

In one of Southwark's larger parks (Burgess Park), however, there are eight purpose-built barbecues and 10 more spots for disposable ones. Barbecues are currently not permitted in any Southwark parks, but before Covid-19 restrictions there were clear guidelines as to what is and is not permitted. For example, BBQs had to be extinguished by 9pm and all rubbish cleared. The area was designed for small groups, but could become very busy, and as fewer parks permit BBQs it does mean that those who do are more likely to attract people from further afield.

Cultural and social considerations

As previously stated, BBQs are popular with people of all backgrounds, but the grilling of meat on an open charcoal fire (called a *mangal*) is particularly important to the Turkish, Kurdish and other middle eastern communities. It may also be a rare opportunity for those without gardens and/or with small flats to be able to meet and eat socially with family and /or friends. This illustrates the difficulty in finding a solution that is acceptable to everyone.

It is also easy to demonise BBQs as creating litter, causing damage and attracting anti-social behaviour. Picnics and other social gatherings in parks can cause as much litter and noise nuisance. A picnic is also much easier to clear away (and to take home the rubbish afterwards) than a hot barbecue. Picnics are also less likely to result in damage to park furniture or grass and do not cause smoke and smells that can interfere with others' enjoyment.

Reviewing the policy

The Parks Service will undertake to review this policy on barbecues annually in the context of the policy, practice and experience of other London boroughs.

However, if BBQs are to be permitted in some parks or designated areas of parks at some point in the future, it is essential that there is a code of conduct to avoid problems such as litter, damage to the park, smoke pollution and nuisance and anti-social behaviour; and that this is **strictly enforced**.

Bonfires and open fires

Fires are not permitted in parks for a range of reasons.

They damage the ground and are a potential danger to other park users, dogs and other animals in the park. They can also result in uncontrolled fires that could cause significant damage to vegetation, trees or buildings. Embers from a fire can be transported on the wind and cause a fire elsewhere, especially in dry conditions.

Even when a fire has died down the embers can be hot for hours afterwards and can injure unsuspecting humans or animals.

Fires also generate smoke which is hazardous to health and unpleasant for other park users. Open fires and bonfires also contribute to air pollution and climate change.

Sky lanterns

Sky lanterns are banned on all Council land in Wales but not yet in England. However, they aren't safe for the environment as they present a fire risk especially after a dry period, they cause litter when they land and they can cause injury to animals as a result of entanglement or entrapment.

	<p><u>Fireworks</u></p> <p>It is unlawful to set off fireworks (including sparklers) in any public place. This includes public parks and greenspaces.</p> <p><u>Allotments</u></p> <p>It is permitted to have bonfires and barbecues on allotments (though no bonfires between April and September). The policy and guidance is set out in appendix 2 of the notes for allotment holders.</p>
Legal position	<p>The Council should consider reviewing and updating its byelaws, or consider a Public Spaces Protection Order (PSPO), as there currently (as of August 2022) is no explicit reference to barbecues in the existing byelaws.</p> <p>Fireworks - www.gov.uk/fireworks-the-law</p>
Penalties and enforcement	<p>Any byelaw (or PSPO) should include the scope to issue a fixed penalty notice and/or prosecution.</p>
References	<p>Where to have a BBQ in London's Parks in 2019 - https://londonist.com/london/food/barbecue-bbq-london-parks-where-which-when-rules</p> <p>Time Out guide to BBQs in London parks in 2019 - https://www.timeout.com/london/things-to-do/eight-smokin-london-spots-you-can-barbecue-in-this-summer</p> <p>London Fields BBQ ban 2019 - https://www.hackneygazette.co.uk/news/environment/barbecues-banned-in-london-fields-for-2019-1-5964499</p> <p>Highbury Fields BBQs cause particulate pollution - https://www.telegraph.co.uk/news/2016/05/28/barbecues-make-popular-london-park-more-polluted-than-city-stree/</p> <p>RSPCA, www.rspca.org.uk/adviceandwelfare/litter/chineselanterns</p>

Name	Alcohol in parks and greenspaces
Policy ref no.	PGSS2
Date adopted	TBA (March 2023)
Review frequency	Every three years (12 months before expiry of extant Public Spaces Protection Orders for alcohol control)
Next scheduled review date	October 2023 (12 months before next PSPO consultation)
Policy position	<ul style="list-style-type: none"> • It is permitted for people aged 18 or over to drink alcohol in parks and greenspaces in Haringey. However, it should be consumed responsibly and in moderation. This means the consumption of the alcohol should not have a detrimental effect on the enjoyment or well-being of others using the park or greenspace. • Under the Anti-Social Behaviour, Crime and Policing Act 2014, the Council has obtained Public Spaces Protection Orders (PSPOs) relating to the consumption and carrying of alcohol in 11 of the council's 19 wards. Where a park or greenspace is included within the alcohol control zone PSPO any person who is causing nuisance or behaving anti-socially can be asked by an authorised officer to stop drinking, and their alcohol can be confiscated within that park or greenspace. A person who has been asked to stop drinking or to surrender the alcohol can be given a Fixed Penalty Notice (a fine). Failure to pay within the prescribed time may result in prosecution. The wards covered by the PSPO are listed here. • In those parks and greenspaces that are not subject to PSPOs, the principle remains the same, i.e. that alcohol may be consumed responsibly (by over 18s). However, if the consumption of alcohol results in anti-social or nuisance behaviour the perpetrator may be asked to leave the park. Failure to do so may result in being arrested under other legislation. • People bringing and consuming alcohol in parks and greenspaces must take the containers home or dispose of them in a bin. Failure to do so can result in fines for littering. • Alcohol may <u>not</u> be consumed in children's playgrounds, designated sport courts, and paddling pools. Signs at the entrances to playgrounds, sports courts, paddling pools and some other facilities state that alcohol (or glass bottles) is not permitted. • Most cafes in parks are not licensed for the sale of alcohol; alcohol should not be taken into them or consumed at tables or areas managed by the café. • Those holding official events in parks may apply for a temporary events notice (TEN) or a premises license to serve alcohol. If granted the serving and consumption of alcohol will be regulated by that TEN / premises licence.

	<ul style="list-style-type: none"> Regular street drinkers in the borough will continue to be offered advice and support into treatment services to help them address their addictions, move out of the ‘street lifestyle’ and address their anti-social behaviour. However, the Council will also use the powers listed above to prevent alcohol related anti-social behaviour from street drinkers in parks or greenspaces. This includes the confiscation of alcohol in parks or greenspaces if necessary.
Definitions	Alcohol means any drink (or other substance) containing at least 0.5% alcohol by volume. This includes beer, cider, wine, spirits, cocktails and pre-mixed drinks containing alcohol.
Context	<p>Parks are places to enjoy leisure and for some that may be a picnic with a shared bottle of wine; for others it may be a can of beer on a bench while soaking up the sunshine.</p> <p>The effects of drinking alcohol in volume are well known, and one consequence can be loud, offensive or anti-social behaviour.</p> <p>We are also aware that some people are not comfortable with alcohol or those who are consuming it even if their behaviour is unaffected. This may be based on their personal experience of alcohol or for religious or cultural reasons for example.</p> <p>Striking the right balance is difficult which is why we refer to drinking “responsibly and in moderation” in this policy.</p> <p>The Parks Service would like to see alcohol control public spaces protection orders (PSPOs) introduced in all parks and greenspaces managed by the council. Currently the alcohol control PSPOs in Haringey do <u>not</u> include many of the borough’s parks and greenspaces.</p> <p>The Council provides advice and support to people who misuse alcohol (or for those affected by others’ misuse of alcohol). Information can be found at https://www.haringey.gov.uk/social-care-and-health/health/public-health/alcohol-and-drugs</p>
Legal position	<p>It is unlawful for people under 18 to drink alcohol in any public place (which includes all parks and greenspaces).</p> <p>Where an Alcohol Control Public Spaces Protection Order (PSPO) is in force, a person guilty of an offence may be given a Fixed Penalty Notice of £100 and is liable on summary conviction to a fine not exceeding level 2 on the standard scale (£500). If alcohol is confiscated, it can be disposed of by the person who confiscates it.</p> <p>If the Fixed Penalty Notice is paid within the required timescale no further action will be taken. Failure to pay within this time may result in prosecution for breach of the Order.</p>

	<p>The Order can be enforced by police officers, police community support officers (PCSOs) and authorised persons representing the London Borough of Haringey.</p> <p>These Orders remain in force for a period of three years. The current orders were created in October 2020.</p> <p>Alcohol cannot be confiscated nor can fines be levied in parks and greenspaces that are not within the boundaries of areas subject to an alcohol control PSPO.</p>
Penalties and enforcement	<p>As set out in PSPOs where present. None where PSPO not in operation.</p>
References	<p>None.</p>

Name	Smoking and vaping in parks and greenspaces
Policy ref no.	PGSS3
Date adopted	TBA (March 2023)
Policy	<ul style="list-style-type: none"> • Smoking and vaping are not permitted in designated play areas or in enclosed or substantially enclosed structures and buildings in parks and greenspaces • Smoking and vaping are not permitted within 10m of the curtilage of enclosed or substantially enclosed structures and buildings within parks and greenspaces. • Smoking of illegal drugs (including cannabis) is not permitted in any park or greenspace. • Smoking of cigarettes, cigars, e-cigarettes and vaping is permitted - but strongly discouraged - elsewhere in parks and greenspaces. • Those who do smoke in parks and greenspaces should be considerate of those around them who have a right to expect clean air in a park or greenspace • Smoking and vaping are not permitted within any Council vehicle (including parks vehicles) at any time. • Council staff and contractors undertaking work for the Council should not smoke or vape whilst engaged in their duties for the council.
Context	<p>Smoking (and inhaling second-hand smoke) is deleterious to health, and many people find the smell of second-hand smoke unpleasant. Cigar, shisha and cannabis smoke are particularly strong and noxious.</p> <p>Children in particular are harmed by second-hand smoke.</p> <p>Legislation prohibits smoking in public buildings and workplaces.</p> <p>Haringey Council's public health service provides information on the hazards of smoking and advice on how to get help to quit at www.haringey.gov.uk/social-care-and-health/health/public-health/smoke-free</p>
Legal framework	<p>The Health Act 2006 requires enclosed or substantially enclosed parts of premises that are public places or workplaces to be smoke-free.</p> <p>The Health Act 2006 also includes powers to make non-enclosed places smoke-free if there is a significant risk that people there might be exposed to significant quantities of smoke.</p> <p>Smoking cannabis (and other illegal drugs) is covered by the Misuse of Drugs Act 1971.</p>
Penalties and enforcement	TBA

Name	Dogs and control of dogs in parks and greenspaces
Policy ref no.	PGSS4
Date adopted	TBA (March 2023)
Review frequency	At least every three years, 12 months prior to expiry of existing borough-wide PSPOs relating to dog control
Next review date	January 2023
Policy objective	To encourage responsible dog ownership that allows owners and their dogs to enjoy parks and greenspaces in the borough without infringing on the enjoyment and safety of others.
Preamble	<p>The Council recognises that the majority of dog owners are responsible and that most interaction between dogs and the public is positive. It is also recognised that dogs can and do play a positive role in society and provide enjoyment and health benefits for their owners and their families.</p> <p>Dog owners are one of the most common and most frequent users of parks and greenspaces in Haringey. Their presence adds to the general sense of safety within parks, they are the daily eyes and ears within parks and are often the first to report issues and damage to equipment, trees etc. Many are actively involved in friends of parks groups and other voluntary groups within parks.</p> <p>However, the policy on dogs and dog control also acknowledges that not all dog owners are responsible, and some dogs represent a risk (actual or perceived) to other park users. A significant number of children and adults are uncomfortable in the presence of dogs and can easily be frightened by dogs of any size. It is important to acknowledge this so that a balance can be struck in ensuring the enjoyment of parks and greenspaces by dogs, dog owners and other park users including those who are less at ease with dogs.</p> <p>It is also important to acknowledge that some cultures do not traditionally have dogs as pets and their presence can be unnerving or frightening. In our multi-cultural and diverse borough, it is important that dog owners are aware of, and respect, this too.</p> <p>The policy therefore seeks to achieve a balance between the control and behaviour of dogs in parks and greenspaces and recognition of the community benefits and the benefits of supporting responsible dog ownership.</p>
Policy position	<ul style="list-style-type: none"> • Dogs taken into parks and greenspaces in Haringey must be under control and they must obey commands from their owner, whether on the lead or off the lead. Being under control means they do not cause damage, distress or harm to people, other dogs or wild animals. • Dogs may only enter Haringey parks and greenspaces with a responsible, supervising person who is able to control the dog. The minimum age for this is 10.

- All dogs in parks and greenspaces in Haringey must wear a collar and be microchipped and/or wear a name tag with the owner's contact details.
- A person in charge of a dog must pick up their dog's poo and dispose of it in a waste bin. A person in charge of a dog must also carry the appropriate means to pick up dog poo. In practice taking a few plastic bags (rather than one) is recommended.
- Dogs must be kept on a lead not more than 2m in length at all times in all parks and greenspaces smaller than half a hectare in area, and in all greenspace owned by Homes for Haringey. A list of the parks and greenspaces under half a hectare can be found in Annex 1 below.
- Well-behaved dogs may be walked or exercised freely (off a lead) in all large parks and greenspaces (over half a hectare in area). This promotes healthy exercise for dogs and takes into consideration the needs of the borough's dog owners and the welfare of their dogs. However, dogs that are exercised or walked off-lead must not behave in a way that is likely to cause annoyance or disturbance to any other park users, or to birds or other animals. A person in charge of a dog should put and keep their dog on a lead if they do not feel they can control the dog or if requested to by other park users, and they must do so if requested to by an authorised officer of the council.
- No more than four dogs should be walked or exercised by a single person in parks and greenspaces, whether or not they are on a lead. The exception to this is licensed dog walkers who may walk up to six dogs provided they can be identified as a licensed dog walker. The licensing scheme is to be developed (see policy PGSS15 on permitted activities in parks and greenspaces).
- Dogs must not enter areas designated as "dog exclusion areas". This includes all fenced/enclosed/designated children's play areas and some other enclosed areas such as picnic areas, sports courts, outdoor gyms and other designated places (unless signage explicitly permits dogs).
- Dog owners must not instruct nor encourage their dogs to cause damage to trees, furniture or other inanimate items in parks and greenspaces, nor to harm people, other dogs or wild animals. Doing so indicates that the dog owner is not being responsible and is therefore not in control of their dog.
- Enforcement of the policies relating to dog fouling, control of dogs, the number of dogs under an individual's supervision, dogs on leads and dog exclusion areas in parks and greenspaces will be undertaken under the council's [Dog Control Public Spaces Protection Order](#).
- Park users who are concerned about the behaviour of specific dogs (or dog owners) are encouraged to report this to the council's enforcement team or to the police via 101 or via the [ASB pages of the Council website](#). Other contact details can be found on signage at park entrances.
- Assistance dogs for people with visual disabilities should be under control, but owners are not required to pick up after them, and they may be taken into areas that are prohibited for other dogs.

	<ul style="list-style-type: none"> The parks service encourages dog owners and others to organise events in parks to celebrate and showcase their dogs as a way of demonstrating the benefits of responsible dog ownership to the community.
Definitions	<p>Dog control public spaces protection orders (PSPOs) are powers given to local authorities under the Anti-Social Behaviour, Crime and Police Act 2014 to control the behaviour of those in charge of dogs in public spaces.</p> <p>Parks and greenspaces over half a hectare are those that are larger than 5,000 square metres which is a little larger than half a full-size football pitch.</p>
Context	<p>Dog ownership</p> <p>There are an estimated nine million dogs in the UK with about a quarter of households owning a dog. However, dog ownership in London is much lower. According to statistics from the Pet Food Manufacturers Association (PFMA) fewer than a tenth (9%) of London households own a dog. Applied to Haringey this still represents around 10,000 households with one or more dogs.</p> <p>Dog ownership has been reported as increasing by 16% since the onset of Covid-19. This suggests that the number of dogs using Haringey parks will increase.</p> <p>Dogs under supervision</p> <p>The rationale for the requirement for dogs in Haringey parks and greenspaces to be supervised with a responsible, supervising person who can control the dog is two-fold. Firstly, it is about ensuring the dog is safe and under control. Responsibility of the dog's behaviour must rest with a person who is able to control and restrain the dog (if necessary) and to clear up the dog's waste.</p> <p>The second reason is to identify and remove stray dogs. Any dog without a responsible person will be assumed to be stray.</p> <p>The lower age for being responsible for a dog in parks or greenspaces (or elsewhere) must be at least 10 as this is the age of criminal responsibility. However, some children aged 10 or more may be clearly unable to control the family dog(s). Their parent or carer should not allow their child to exercise a dog in parks or greenspaces over which the child does not have full control.</p> <p>Collars and micro-chipping</p> <p>All dogs in parks and greenspaces in Haringey must wear a collar as this is a requirement of all dogs in public spaces. Similarly, all dogs 8 weeks or older should be microchipped.</p> <p>Dog owners are also required by law to tag their dogs when out in a public place. The parks service therefore expects any dog in its parks to be identifiable by name tag and contact details attached to the collar. This is in addition to being microchipped, which has been a legal requirement since 2016. This means an unaccompanied dog can be identified as such and reunited with its owner. A dog that cannot be identified in this way will be assumed to be a stray. This may</p>

result in kennelling or other fees and after seven days it may be transferred to All Dogs Matter.

Dog poo (faeces)

Over the years the amount of dog poo in parks and greenspaces has substantially reduced. Nowadays most dog owners pick up their dog's poo, bag it and bin it. This is to be welcomed. However, some owners do not do this. Everyone knows how unpleasant it is to step in dog poo. Indeed, it can be - and is - the cause of slips and falls.

Dog poo can cause infection and illness and there is a very small risk of serious parasitic infections (such as toxocariasis round worms).

Responsible dog owners accept their public duty to pick up after their dogs. The same duty should be observed by less responsible dog owners in the interest of public health and clean parks. This is why the public spaces protection order requires dog owners/walkers to pick up after their dog(s).

The policy also requires dog owners/walkers to carry with them a bag (or other means) to pick up if their dog does a poo in parks and greenspaces. This was added to the dog control PSPO in October 2020.

Number of dogs walked

How many dogs is it safe and responsible for one person to walk or exercise in a park or green space? It depends on all sorts of things such as the behaviour, size and breed of the dogs to the physical strength, age, experience and/or control the person in charge of them has. Other factors such as the presence of children, hazards or other dogs or animals can add to the complexity of the issue.

The current dog control PSPO for Haringey specifies that up to six dogs may be walked by a single person. This expires in October 2023, which will be an opportunity to align the policy objective with a new PSPO (subject to wider consultation on the PSPO at the time).

The Kennel Club argues that “an arbitrary maximum number can legitimise and encourage people to walk dogs up to the specified limit, even if at a given time or circumstance, they cannot control that number of dogs”.

Despite this the Council takes the view that there should be an upper limit. Most London boroughs specify a maximum number in their dog control public spaces protection orders (though some do not). These vary from four (for example in the Royal Parks or in parks in Newham) to up to six in Waltham Forest and on Hampstead Heath just to the west of Haringey (which is administered by the City of London Corporation). Lee Valley Park on Haringey's eastern borders limits the number to five.

A significant consideration is whether the dogs are on leads or not. Those that are off lead are much more difficult to control and in woodland in particular (such

as Coldfall Wood or Queens Wood) it can be extremely difficult to keep an eye on all of them, let alone exercise control over them.

It is worth examining the data on the number of households that own more than four dogs. The PFMA figures suggest that well below one percent of all dog owning households nationally have more than four dogs, and it is reasonable to assume the great majority of these are in rural areas. Applying this to Haringey it is likely that the number of households with over four dogs is well below 100, possibly only a dozen or two.

The reason for this calculation is to understand who might want to exercise more than four dogs in Haringey's parks or greenspaces. There will be very few dog owners with over four dogs. Professional dog walkers on the other hand are much more likely to have more than four dogs in their charge (as their income is in proportion to the number of dogs they walk).

The parks service would like to ensure that anyone wanting to walk more than four dogs (but not more than six) in Haringey parks and greenspaces is licensed. They would need to demonstrate they were able to do this safely and responsibly and they would be required to wear an armband indicating that they are licensed whenever they are walking five or six dogs in a Haringey park or greenspace. The detail of this proposal will be developed as part of the permitted activities policy (PGSS15).

The Council has considered reducing this figure to four as, both the Professional Dog Walkers Association (PDWA) and the National Association for Pet Sitters and Dog Walkers (NARPS) recommend that dog walkers should walk no more than four dogs at a time. However, while this is an ideal maximum a licensing scheme for up to six – subject to future review – reflects the position taken by the Council in the past (and many other councils currently) in respect of the number of dogs that can be walked.

Parks for London also support a maximum of four dogs.

The National Association of Pet Sitters and Dog Walkers (NarpsUK) have terms and conditions in place for its dog walking and pet sitting members. Two of these conditions are that no more than four dogs should be walked at one time and that only dogs where you can guarantee their recall should be let off leads.

Dogs on a lead in specified locations

The requirement to keep dogs on a lead in smaller parks (under half a hectare) is because of the size of the space. This has been a condition of the dog control orders and PSPOs for several years.

Dogs on a lead by direction

This requirement has also been a condition of the dog control orders and PSPOs for several years. It is in place to ensure the safety and well-being of other park users, dogs or animals due to the perceived risk or danger presented by the dog(s) in question. Where necessary the authorised officers have the powers to

	<p>direct people to keep their dog on a lead even in spaces bigger than half a hectare.</p> <p>Dog exclusion areas</p> <p>Dogs are not permitted into designated areas with or without a lead. These places are listed on the dog control PSPO. Such places include children’s playgrounds, multi-use games areas (MUGAs) enclosed sports pitches and ball courts, fenced picnic areas, fenced paddling pools and ponds.</p> <p>Dogs may not go into children’s play areas as these areas are exclusively for play. Children should feel safe to run around and play. The presence of a dog (on a lead or not) may frighten or intimidate the child. Dog faeces and urine should not be present in a play area as they could carry infection as well as being unpleasant if encountered. The urine can also damage the soft surfacing that is found in play areas.</p> <p>Some dog owners exercise their dogs in fenced areas such as fenced tennis courts or picnic areas etc. These are intended for these specific purposes and not for exercising dogs. However, it can be difficult for someone wanting to sit in a picnic area or children wanting to use a tennis court to ask a dog owner (who may be older or whose dog may be intimidating) to leave the area.</p> <p>Many sports courts have been built with external funding and the agreements are that they are to be used for intended purpose only.</p> <p>Existing signage in some fenced sports pitches, picnic areas or enclosed sensory or contemplative gardens can be ambiguous, but the presumption is that these should not be used by dogs. The signage should be modified where there is ambiguity.</p> <p>Promoting dogs and dog ownership</p> <p>This policy document does not seek to demonise dogs or dog ownership. Indeed, the parks service is keen to encourage events in parks and greenspaces that promote or showcase local dogs (and their owners!) and it supports the Alpha Dog Training School in Finsbury Park.</p> <p>Other issues</p> <p>If dogs are permitted into park buildings, they must be kept on a short lead at all times. The leases of the buildings may (or may not) make reference to dogs. However, if the building is leased to a third party it is at their discretion whether they permit dogs to enter.</p> <p>Assistance dogs must be granted access (with their owner) to any public building in parks during their normal opening hours.</p>
Legal position	The Anti-Social Behaviour, Crime and Police Act 2014 (gives local authorities the power to make public spaces protection orders (PSPOs). The relevant sections are s59-s75.

	<p>The current Dog Control PSPO can be found at https://www.haringey.gov.uk/community/community-safety-and-engagement/anti-social-behaviour/control-dogs-public#PSPO</p> <p>Dogs Act 1871</p> <p>Dangerous Dogs Act 1991 (and amendments in 1997 and 2014)</p> <p>The Control of Dogs Order 1992</p> <p>The Microchipping of Dogs (England) Regulations 2015</p> <p>Clean Neighbourhood and Environment Act 2005 introduced dog control orders but this was replaced by the ASB, Crime and Policing Act 2014 (PSPOs)</p>
<p>Penalties and enforcement</p>	<p>A person who is guilty of an offence under the Dog Control PSPO may be liable to a fine not exceeding level 3 on the standard scale (currently up to £1,000).</p> <p>A Fixed Penalty Notice of £100 may be issued to offenders, which would discharge any liability to conviction for an offence under Section 67(1) of the Anti-Social Behaviour, Crime and Police Act 2014.</p>
<p>References</p>	<p>LB Haringey dog control orders - https://www.haringey.gov.uk/environment-and-waste/noise-and-animal-control/dog-control-orders</p> <p>https://www.camden.gov.uk/dog-fouling-control#ipvt</p> <p>https://www.brent.gov.uk/services-for-residents/culture-leisure-and-parks/parks-and-allotments/dog-control-orders/</p> <p>https://walthamforest.gov.uk/content/dog-control-orders</p> <p>https://hackney.gov.uk/dogs-in-parks and https://hackney.gov.uk/dog-control-orders</p> <p>Paper on recommended maximum number of dogs walked, Kirsten Dillon (A.Dip CBM), via Parks for London, https://parksforlondon.org.uk/wp-content/uploads/2020/08/IMPACT-STUDY-NUMBER-OF-DOGS-THAT-MAY-BE-WALKED-SAFELY-AT-ONE-TIME..pdf</p> <p>Narps(UK) terms and conditions, 2014 https://parksforlondon.org.uk/wp-content/uploads/2020/08/NARPSUK-Responsible-DogWalking-January-2014.pdf</p> <p>Professional Dog Walkers Association</p> <p>https://www.pfma.org.uk/dog-population-2019</p> <p>https://www.gov.uk/age-of-criminal-responsibility</p> <p>https://professionaldogwalkersassociation.co.uk/index.html</p> <p>https://www.narpsuk.co.uk/static/terms-and-condition</p> <p>http://www.legislation.gov.uk/ukpga/2014/12/part/4/chapter/2/crossheading/supplemental/enacted</p>

Annex 1: Parks and greenspaces managed by Haringey parks service that are under 5,000 sq m (half a hectare) in area

Park or green space	Postcode	Notes
Adams Road To Lordship Lane	N17	Side of footpath
Archway Beds	N6	Archway Rd Opp Police Station
Aylmer Gardens	N6	Junction of Aylmer Rd, Sheldon Ave & North Hill
Barratt Gardens	N22	Junction of Station Road and Mayes Road
Bidwell Gardens	N11	Side of Sunshine Garden Centre Durnsford Road
Blaenhaven Gardens	N22	Junction Fortis Green and Eastern Road
Bounds Green Baptist Church	N22	Front of church jnct Bounds Green Rd and Braemar Ave
Brook Street Playground	N17	Stoneleigh Road
Brunswick Road Open Space	N15	Open Space
Campsbourne Bank	N8	Rectory Gardens/High Street
Caxton Terrace	N22	Station Road / Parkland Road
Chapmans Green	N22	Junction Lordship Lane and Perth Road
Chapmans Green	N22	
Christchurch Hedge	N8	Crescent Road/Crouch End Hill
Cline Road	N22	Cline Road Bounds Green Road
Clyde Road South	N15	Junction Lawrence Road and Bedford Road
Coleridge Gardens	N6	Shepherds Hill/Archway Road
Colney Hatch Lane	N10	Roadside verge
Crescent Road Gardens	N19	Junction Crouch End Hill
Doran Manor Strip	N2	Great North Road Opp Woodside Ave
Durnsford Road Verges	N11	Durnsford Road including Rhys Ave frontage
Durnsford Rockery	N11	Junction of Durnsford Road and Wroxham Gardens
Falkland Fairfax Open Space	N8	Junction Wightman Road and Falkland Road
Finsbury Gardens	N22	Finsbury Road btwn Nightingale and Truro Roads
Florence Gardens	N4	Junction Upper Tollington Park
Graham Road	N15	Triangle
Granville Road Gardens	N4	Granville/Stapleton Hall Road
Granville Road	N22	Open space
Great North Rd Islands	N2	Gt Nth Rd/Aylmer Rd/Archway Rd
Green Gate Common	N15	Opp Ducketts Common
Greenridings Telephone Exchange	N22	High Road/Bounds Green Rd
Grove Lodge Gardens Frontage	N10	Grove Lodge Gardens Frontage Muswell Hill
Harcourt Gardens	N22	Junction Durnsford Road/Albert Road opp Albert Rec
High Road No 294	N22	Corner of Canning Crescent

Park or green space	Postcode	Notes
High Road Gardens	N22	Opposite Civic Centre, Between High Rd/Stuart Crest
High Street Enclosure	N8	High Street Cross Lane
High Street Playground	N8	Hornsey High St opp Middle Lane. Site relandscaped
Hornsey Lane Triangles	N19	Junction Hornsey Lane and Crouch End Hill
Hospital Common	N15	Between Tottenham Green East and High Road.
Ivatt Way to Belmont Road	N22	Space between Ivatt Way/Belmont Rd
Kingsley Place	N6	Junction Southwood Lane
Lordship Recreation	N17	Outside Main Gates
Lydford Road Island	N15	Oulton Road
Lynton Gardens	N11	Junction Blake Road
Marsh Lane	N17	Roadside verge
Middlesex Cricket Entrance	N8	Park Road
Midhurst Gardens	N10	Junction Fortis Green and Midhurst Ave
Muswell Hill Banks	N10	Near subway north and south
Muswell Hill Peace Gardens	N6	Junction Archway Rd/Muswell Hill Road
Neville Place	N22	Neville Place/High Rd N between Trinity and Commerce Rds
New Road Recreation Ground	N22	Between New Road and Norman Avenue
Newnham Slips	N22	Behind Woodside Park from school to White Hart Lane
Page Green Common	N15	Between Ashmount Road and Broad Lane
Page Green Terrace Borders	N15	High Road rom Pembroke Road to Townsend Road
Palace Gardens	N22	Junction of Albert Rd/Alexandra Park Rd
Palace Gates Road	N22	Palace Gates Road junction Crescent Road
Park Grove	N11	Open space
Park House Passage	N6	Park House Passage off North Hill
Park Rd Beds & Maynard Gdns	N8	Junction Park Road and Palace Road
Priory Common	N8	Priory Rd verge from Park Ave North to Redston
Pulford Rd	N15	North End Open Space
Rangemoor/ Herbert Rd	N15	Open Space
Rectory Gardens	N8	Hornsey High Street/Rectory Gardens
Rokesly Gardens	N8	Tottenham Lane/Rokesly Avenue
Russell Park	N22	Russell Avenue
Ryecroft Way	N17	Open space
Manchester Gardens	N15	Between Manchester and Heysham Rd
Shelbourne Junction	N17	Jnct Lansdowne Road
Sheldon Avenue	N6	North end open space
Shepherds Hill Gardens	N6	Shepherds Hill
Somerford Grove Play Area	N17	Adjacent green space
Somerset Gardens	N6	Roadside verge
Southwood Lane	N6	
Springfield Park	N11	Park Road

Park or green space	Postcode	Notes
St Georges Hall	N8	Cranley Gardens / Park Road
St. Albans Crescent	N22	Junction Cranbrook Park
Stainby Road	N15	Junction Monument Way
Stanley Road	N15	Open space

Source: [extension of alcohol dog control pspos.pdf \(haringey.gov.uk\)](#)

Name	Boundaries and security of parks and greenspaces
Policy ref no.	PGSS5
Date adopted	TBA (March 2023)
Review frequency	Initially annually (after the summer period)
Next scheduled review date	October 2023
Policy position	<ul style="list-style-type: none"> • Whether a park or greenspace is fenced or not, a record of the boundaries are maintained by the Council and by the Land Registry. • Parks and greenspaces will usually have a physical boundary, often a fence, hedge or railings, with gates or entrances at appropriate points to enable park users to enter and leave the park at such points. However, the Council does not undertake to ensure each park boundary is fenced (or otherwise secured) in its entirety. Many parks have significant lengths of their boundary that are unfenced. • Open spaces, greens, commons and verges etc are much more likely to be unfenced or partially fenced. This is often a historic legacy, but it also means people can use the space as a route between two places (such as home and a transport node or shops) rather than as a destination. The Council treats each open space on a case-by-case basis, but the presumption is that it will be unfenced or partially fenced. • Only those entrances indicated by a sign (or otherwise specified) are the official entrances to parks and greenspaces. • Boundaries will be maintained by the Council to the best standard possible within available budgets. Priority will be given to maintaining boundaries with roads, railways and other potential hazards to park users. Boundaries with private properties will be maintained at the discretion of the parks service, but with a presumption that the neighbouring property owner will maintain the boundary to meet their own needs for security or privacy. • Gates and gaps in boundary fences and walls that provide access from adjacent private property onto parks or greenspaces will be resisted by the council. Accessing parks and greenspaces from private property, without permission, may be treated as trespass. Such access points from private property will be particularly resisted where the green space is a local nature reserve or has other ecological importance. • Action may involve the installation of a physical barrier. Legal action may also be taken against property owners who create direct access from their property into a park or open space that is not an entrance designated as such by the council.

- Action may also be taken against property owners in respect of a gate or entrance that was installed in the past, possibly by a previous property owner.
- Unauthorised encroachment by individuals into parks and greenspaces from adjoining properties will not be tolerated. Legal action will be taken if required.
- Park gates providing pedestrian (and cycle and wheelchair) access will not, as a rule, be locked at night.
- In exceptional circumstances the Council may choose to lock a park at night (or at other designated times). In such circumstances a gate locking schedule will be drawn up and published and the reason for locking the park will be stated. However, even where there is a published schedule to lock a specific park at night it may not always be possible to do so, in which case the park may be left unlocked.
- Vehicle gates will be kept locked at night and during the day except where specifically identified in the park management plan as being open for vehicle access. This may include vehicle access for leaseholders of properties accessible only via the park or green space.
- Height barriers will be used to prevent caravans and mobile homes from accessing parks at entrances that are considered to be vulnerable to such intrusions.
- Some entrances may be protected by bollards rather than a gate where it is desirable to enable pedestrian and bicycle access but to deter vehicles. The choice of bollard (permanent or removable) will depend on whether authorised vehicle access is permitted by the council.
- Where vehicle access to a park is needed by an authorised vehicle user (such as by parks staff, contractors, leaseholders or for event set up etc) the bollard and/or vehicle gate and height barrier (if opened) should be locked again immediately after the vehicle has passed through in each direction.
- In exceptional cases pedestrian entrances may be protected by special entrance treatments to prevent motorcycles, but the access needs of disabled and other park users must be considered in such circumstances, as must the requirements of the Disability Discrimination Act 1995 and associated legislation.
- Emergency services vehicles must be able to enter parks and greenspaces without notice if required. At least one designated vehicle entrance in each park will be secured with a lock (or similar) to which the emergency services have a key. The standard we are seeking to develop across all parks is Gerda security locks at all single-opening vehicle gates.
- In exceptional circumstances it may be necessary to lock one or more parks (or park entrances) to prevent public access during the day. Once locked the

	<p>reasons for closure will be posted at entrances and via social media and other electronic means.</p> <ul style="list-style-type: none"> • In the event that a person finds themselves locked in a park they will find contact telephone numbers on park noticeboards including the Council out of hours number 020 8489 1000. If they are unable to raise the alarm, they can call 101 or – in an emergency - 999. • Where new park boundary fences are installed by the Council these will generally be at least 1.2m high to deter people from climbing over and of the design set out in the style guide. Boundary fences pre-dating this policy document may be of a different specification. • All designated under XX playgrounds within parks should be fenced and gated as specified in the Asset Management Plan style guide.
Definitions	<p>Encroachment refers to unauthorised acquisition of land achieved by extending a fence or other boundary marker and to access to greenspaces achieved by entrances other than those designated by the council.</p>
Context	<p>It is important to keep a balance between making parks and greenspaces available to users while protecting them from damage or abuse. Unauthorised vehicle access can cause serious problems including travellers occupying the land, ‘joyriding’, unauthorised parking, dumping and fly tipping. It is particularly important that vehicle entrances are secured to deter all unauthorised vehicles. However, it is much more difficult to prevent motorcycles and powered two-wheel vehicles.</p> <p>Many public open spaces from canal and river towpaths to national parks are open 24/7; so too are many (but not all) other local authority parks and greenspaces. In Haringey the default position is that parks and greenspaces should be open unless there is a compelling, short term local reason for this not to be the case.</p> <p>It is important to state that at the time of developing this policy position some parks and open spaces have little or no fencing (such as Tottenham Green) and/or are without gates at several entrance points (such as Parkland Walk or Hartington Park) while others are enclosed fenced areas that can easily be secured (such as Priory Park or Tower Gardens). Many fall between these descriptions with perhaps bollards or a chicane at entrances that cannot easily be locked to prevent pedestrian access.</p> <p>Although the policy presumes that parks and greenspaces will not be locked at night (or at other times) this document also considers the question of whether - and if so which – parks and greenspaces should (or could) be closed to users and if so when.</p> <p>The first consideration is the circumstances in which it might be desirable to close, lock, fence or secure parks (or areas within parks). Such circumstances might include:</p> <ul style="list-style-type: none"> - To establish clear boundaries so that it is clear to everybody which land is park land and which land belongs to others

- To prevent or deter damage to parks and their assets
- To prevent unauthorised access to or use of parks and greenspaces (such as a rave or other event not sanctioned by the council)
- To prevent nuisance to those living near to parks at night (or other times) such as from noise or vehicle movements
- To prevent the risk of harm coming to park users (from a number of possible causes) such as the risk of trees falling in the event of a predicted extreme storm.
- To ensure that areas designated for specific purposes (such as play, picnics, sport or peaceful reflection) are separated from other activities in the park that could interfere with the enjoyment or safety of users.
- To protect or encourage wildlife.

If there are powerful reasons why a park or greenspace (or part of it) is to be locked, at what times and/or on what days this should occur? And how will this be done? It may only be necessary occasionally due to a scheduled large event for example or in response to a sudden spate of crime at night, or perhaps in winter only.

The practicalities of gate locking should not be overlooked: In the summer if parks are to remain from dawn to dusk the gates must be locked late in the evening and opened very early in the morning.

Neighbouring properties and security issues

It is also worth noting that although many parks have council-owned fencing along their outer perimeter, not **all** boundary fencing belongs to the council. And while the Council aims to maintain its park fencing as far as is practicable, we do not have the resources to keep it all in its original condition or to always be able to quickly repair sections that have become damaged. Instead, the Council has to consider its fencing work alongside other priorities, focusing on the most urgent and important tasks.

The Council recommends that owners of properties bordering parks do not depend on Council fencing. The Council does not have a responsibility to provide security or fencing for neighbouring private property. In most cases it is advisable for owners to maintain the fencing along the boundary (on their own land) of a nature that suits their own security needs.

Encroachment

The council's position is set out in the Cabinet minute (no 174) from the report on Encroachments and Expired Leases on Council Land that was considered on 22 April 2008. In summary it was agreed that:

- enforcement action [should] be taken against all homeowners who had encroached on to Council land at Parkland Walk Local Nature Reserve and Palace Gates Embankment such action to proceed on a case-by-case basis with advice from the Head of Legal Services.
- That as leases of Council land [on Parkland Walk] to private homeowners expired these be re-offered but at full 'market' value and if

	<p>not taken up then the land be returned to the nature reserve with the advice of the Head of Legal Services.</p> <ul style="list-style-type: none"> - the course of action for dealing with encroachments would be applied not only to the two sites identified in the report but to other Council owned land including that being managed by Homes for Haringey. - there might be small parcels of land where granting leases or disposal might be considered and such sites should be considered on a case by case basis. <p>This resolution provides a clear guideline for the approach to encroachment on all Council parks and greenspaces.</p> <p>On some sites - especially nature reserves - encroachment can also be considered to include dumping of garden waste, rubble or other materials on greenspaces. Fly-tipping is covered by policies on enforcement as it is a criminal offence attracting fines on a sliding scale up to £50,000.</p> <p>Prevention of vehicle access to parks and greenspaces makes large-scale fly tipping and dumping less likely.</p> <p><u>Vehicles in parks</u></p> <p>This is dealt with in more detail in a separate policy document (PGSS10). However, it is worth noting the nuisance caused in some parks by motorcycles/mopeds using them as a short cut. This has been reported more frequently since the widespread use of satnav systems especially by people working for food delivery services.</p> <p>Electrically powered cycles and scooters also pose a risk to park users if operated at high speed. It is not lawful to ride such vehicles in public places,</p> <p>Unfortunately measures to prevent them from [easily] accessing parks and greenspaces also impacts on pedestrians, cyclists, wheelchair users people with children in buggies and other perfectly legitimate users. Historically a few entrances (such as at Coldfall Wood and Muswell Hill Playing Fields) have been designed to prevent motorcycle access but this is at the expense of access for other groups. It is preferable to try to try to prevent this through a combination of education and enforcement.</p>
Legal position	<p>Councils are not required under law to lock parks at night.</p> <p>Encroachment without permission on parkland by a neighbouring landowner is a trespass enforceable by injunction and eventually, on continued trespass, by committal to prison.</p> <p>Access to parkland is by licence of the local authority, and there is no automatic right to cross the boundaries at a point of the accessors choice. The Council is entitled to designate access points, and to refuse access elsewhere on the basis that that access is similarly a trespass.</p>
Penalties and	As above.

enforceme nt	
Reference s	Cabinet report and minutes from 22/408 (agenda item 174) https://www.minutes.haringey.gov.uk/ieListDocuments.aspx?CId=118&MId=261&Ver=4

Name	Pesticides and chemicals policy in parks and greenspaces
Policy ref no.	PGSS6
Date adopted	TBA (March 2023)
Review frequency	At least every three years and sooner if there is any change to UK regulations or guidance in respect of glyphosate
Next review date	April 2026
Policy statement	<ul style="list-style-type: none"> • The Parks Service’s goal is to cease using inorganic chemical pesticides and herbicides as far as legally possible by May 2026. • During this period and beyond, the Council will have a duty to act on identification of existing or newly identified tree pests & diseases, in line with DEFRA’s containment strategies. For example, spraying of oak processionary caterpillars as these pose a risk to the health of the tree and the public. • In addition, the Council has a legal duty to stop the spread of invasive non-native plants on land that it owns. Failure to do so will mean that the Council is liable for the damage to other land or property and could be prosecuted. The most commonly found invasive non-native plants include: <ul style="list-style-type: none"> • Japanese knotweed • Giant hogweed • Himalayan balsam • Rhododendron ponticum • New Zealand pygmyweed • Where possible and practicable, the Parks Service will transition to the use of non-herbicide methods of weed control such as hand weeding, mulching, hoeing, mechanical, hot foam and electrocution over the next three years. The Council will adopt a three stage process to: <ol style="list-style-type: none"> 1. Identify a non-pesticide control option as the first choice 2. Consider an integrated management approach (non-pesticide with limited targeted pesticide) 3. As a last resort, choose a pesticide only approach • Under no circumstances will the Council use a residual pesticide designed to stay in the ground to control weed growth. • The Parks Service will only consider the use of chemicals or pesticides that have a current license (under UK law) and which are approved for use by the Health and Safety Executive (HSE). • The Parks Service recognises that, currently, there are certain limited circumstances (e.g., control of oak processionary moth or invasive plant species) where an alternative, non-chemical approach is not available / proven. However, in managing its parks and greenspaces,

the Council's long-term aspiration is to avoid the use of inorganic chemicals and pesticides altogether.

- Pesticides and chemicals (including glyphosate-based herbicides) will only be used in parks and greenspaces where there is an identified need to manage pests or weeds and viable, safe, cost-effective alternatives are not available.
- Staff and contractors using chemicals and pesticides will be appropriately trained and provided with appropriate personal protective equipment and clothing.
- Extreme care will be taken when applying chemical herbicides and pesticides to ensure that only the identified areas for treatment are treated.
- Unless effective, safe, new treatments are developed, the Council will continue to use glyphosate or other inorganic chemicals for the treatment of invasive species that are resistant to other treatments (such as Japanese knotweed) and dangerous pests (such as oak processionary moth). The treatment will be by injection (rather than spraying) wherever possible to maximise the efficacy of the treatment and to minimise the volumes used.
- Eco-plugs that contain a crystalline form of glyphosate may be used by the Council to prevent growth re-emerging from tree stumps after trees are felled. They are inserted into the tree stump close to ground level.
- The Parks Service will only use or permit its contractors to use chemicals and pesticides in the following particularly sensitive sites, following consultation with the relevant Friends group (if any) and with the agreement of the Nature Conservation Officer. This might be in the event, for example, of an invasive species or dangerous pest being identified in:
 - Ancient woodlands
 - Sites of importance for nature conservation (SINCs)
 - Local nature reserves
 - Children's playgrounds
 - Watercourses and water features
- The Parks Service will review and report on its use of glyphosate (and that of its contractors) annually and will monitor and react to any changes in the guidance (or legal position) in relation to the use of glyphosate.
- The Parks Service will monitor and pilot the use of alternative technologies and non-chemical treatments for pests and weeds, to include a cost benefit analysis of such alternatives. These pilots will include:

	<ul style="list-style-type: none"> • Heavy mulching of pilot areas • Increased planting densities and use of ground cover planting • Hot foam weed encapsulation systems • Weed electrocution systems • Chemical-free parks or greenspaces <ul style="list-style-type: none"> • The Council will develop a series of pilot chemical free parks or greenspace projects which friends groups, volunteers and community weeding taskforces. • To develop a detailed local weed management plan for parks and greenspaces, based on the principles set out here and with reference to the Parks for London guidance Integrated Weed Management Guidance - Parks for London, by the end of 2023.
Definitions	<p>A pesticide is any substance that is intended to prevent, destroy or repel any pest, including weed and fungal growth. The definition therefore includes herbicides (which target weeds), pesticides (which target insects and small animal pests) and fungicides (which target fungal infection).</p> <p>Glyphosate is a specific chemical and the primary active ingredient used in most chemical herbicides. It has been subject to considerable debate about its safety which is explored in detail in the context section below.</p>
Context	<p><u>Chemical and pesticide usage</u></p> <p>There is growing concern about the use of chemicals and pesticides and their impact on human health and the environment both locally and globally. The growth of organic agriculture and the demand for organic food in the UK is testament to a shifting in attitudes, though this still remains under 10% of UK food sales by value.</p> <p>The Parks Service in Haringey has made limited use of chemical weedkillers and pesticides as an effective and cost-effective method of managing weed growth, invasive plant species (e.g. Japanese knotweed) and for the control of harmful insects and other pests (e.g. oak processionary moth).</p> <p>Typically, one (or two) application(s) of glyphosate-based herbicides per year may be made in areas where weed growth needs to be controlled. The Parks Service uses a pre-mixed chemical containing glyphosate that is applied by controlled droplet applicators. Staff must be certified before handling the chemicals and spraying any areas. This approach means there is very limited interaction for the operator with the chemical and the amount actually sprayed is limited.</p> <p>Once sprayed, the chemical dries quickly on the area and is inert to humans or pests after it's dry so, should someone decided to sit next to</p>

a tree that had been recently sprayed around, there should be no transfer (unless they sit down immediately afterwards).

The Parks Service has also used traditional methods of weed control such as hand weeding, mulching and hoeing, but they are not as effective in preventing weed growth than glyphosate and are much more labour intensive (and therefore costly).

Acetic acid (vinegar) and nematodes (small round worms that feed on insect pests) have been used on a limited basis as methods tested in Haringey to deter pests and weed growth respectively but neither appears to be as efficacious as chemical alternatives.

Usage elsewhere

A few English local authorities have made commitments to avoid the use of all pesticides (Brighton and Hove) or glyphosate in particular (e.g., Hammersmith and Fulham, Glastonbury) and there are some examples of pesticide-free authorities elsewhere in Europe (e.g. Aalborg in Denmark and Munster in Germany). However, most councils use a range of pest and weed control methods including the use of non-organic chemicals.

Glyphosate

Glyphosate is the active ingredient in the most widely used herbicides over the last forty years, and currently routinely used by Haringey's Parks Service in a range of products. Glyphosate has been in the public eye for some time, but especially since a court finding in the United States in 2018.

Monsanto (which is now owned by Bayer) is the manufacturer of the main glyphosate treatment which is marketed as a product called Roundup. Monsanto was found guilty by a US jury in August 2018 and ordered to pay \$289m in damages because Roundup had caused non-Hodgkin's lymphoma cancer in a former groundskeeper.

It should be noted that the formulation of Roundup in the USA includes POE-tallowamine. This substance was banned by the EU for use in glyphosate-based herbicides in 2015. The ban followed EU research that found that POE-tallowamine was found to be more hazardous than glyphosate. This suggests that the formula used in Europe is different to that used in the US.

Glyphosate is licensed for use in the EU (and in the UK, subject to any post-Brexit changes to legislation or regulations). When the EU licence for glyphosate expired in 2017, it was not renewed (which would have given a licence until 2032), but it was extended for 5 years up until December 2022.

An application was made [by glyphosate manufacturers] in December 2019 for an extension to the license. An extension to the license for the

use of glyphosate will be subject to an EU regulatory process taking into account progress in science and technology and experience gained since the active substance was last reviewed. Glyphosate will be assessed in terms of its safety for humans, animals and the environment. It is unclear how – or when - the UK government will respond.

Austria went glyphosate-free from 1 January 2020 and France set a target to phase out its use by 2021 except where no viable alternatives existed. Other countries, including Belgium and Germany are looking to ban glyphosate.

There have, however, been over 800 studies done which fail to show a direct link between glyphosate and cancer although, in 2015, the WHO's International Agency for Research on Cancer concluded that glyphosate 'probably' causes cancer – the same year that the European Food Safety Authority concluded it 'unlikely' to do so. It is worth noting that while the carcinogenic properties of glyphosate are unproven, several foodstuffs (such as processed meat, alcohol and acrylamide (in coffee) etc) are acknowledged carcinogens.

Several studies have looked at the association between glyphosate and the risk of non-Hodgkin's-lymphoma (NHL). [A meta-analysis conducted in 2019](#) concluded that there was an increased risk of NHL for those with the very highest levels of exposure to glyphosate. Many of these studies look at the rate of adverse events in those with high levels of exposure, for example agricultural workers or glyphosate handlers.

Haringey Council's public health team, in reporting to the Friends of Parks Forum, reached the conclusion that "on balance, the risk to park users is very low. Those using Finsbury Park for leisure purposes [for example] are unlikely to come into contact with high levels of this chemical".

The team added that "risks to park staff using glyphosate herbicides are mitigated using modern systems and safety measures to keep the operative away from the chemical".

The team also cited evidence and FAQs collated by the Health and Safety Executive which is listed in the references below.

If glyphosate were to be phased out of use in Haringey, effective alternatives will need to be found. The Parks Service has already reduced dependence on mechanical weed control (strimming for example) due to hand-arm vibration syndrome (HAVS) implications. Effective chemical alternatives do not appear to be available, with the possible exception of Chikara, which is effective on pre-emerged weeds but not suitable for actively growing weeds, when it is recommended to combine with glyphosate which would defeat the object.

Alternatives to glyphosate

The Pesticide Action Network UK publication *Alternatives to glyphosate in weed management* – includes a range of non-chemical alternatives, but does not suggest alternative chemical products, suggesting that replacing one chemical for another is not a favoured option – by that group at least.

Many local authorities have tried alternatives. However, unless weeds are removed manually then the alternatives introduce new issues. For example, the most common alternative is a hot foam system that encases the weeds in a hot foam and damages the plant due to the applied heat. This system (whilst removing the chemical) introduces a vehicle with emissions, a large diesel / propane generator on the truck to heat the water, large amounts of water and then mixed oil to produce the foam.

Equally, thermal control (flamers and steamers) raises questions over the use of fossil fuel when the Council is seeking to reduce carbon impact and also consider the safety of use.

Tolerance of weeds

One way to reduce the use of herbicides is to take a more tolerant approach to weed management. This should be an early consideration in any weed management policy. Considerations include:

- Is the weed invasive, and is its removal essential to prevent ecological harm or damage to assets such as pathways or buildings?
- Does the weed growth have a detrimental effect on the aesthetics of a space (such as a formal garden)?
- Does the weed growth accumulate detritus or litter that may result in adverse impacts such as blockage of gutters or drains?
- Is the weed growth benign and can therefore be tolerated?
- If the weed cannot be tolerated can it be designed out (though planting, mulching or other approaches)?

Parks for London's Guide for Integrated Weed Management

Parks for London published *A Reference Guide for Integrated Weed Management in Amenity Spaces and Public Realm*¹ in March 2020. This document provides a thoughtful and considered approach “to help landowners and managers to prepare [their own] integrated weed management plans”.

This is a substantial document with plenty of good advice. A simplified approach to integrated weed management is set out on pages 5 and 6. It is about exploring other options, such as mechanical, biological, or

horticultural weed control methods before considering chemical or herbicidal weed control methods. The approach is simplified below into four questions:

- Can the weed be tolerated or managed? If not ...
- Can the weeds be designed out (such as mulching or a weed-suppressing membrane)? If not
- Can the weeds be managed without the use of chemicals such as manual or mechanical methods (such as hoeing), thermal methods and/or biological weed control methods? If not ...
- Is chemical control the only suitable method?

The following table provides an assessment of alternatives available to be considered:-

Method	Use	Advantages	Disadvantages
Hot Foam	Weeds in hard surfaces Moss on hard surfaces and play area safety surfacing, Grass growth around trees, non chemical graffiti removal.	Foam holds hot water against plant. Pesticide free. Can be used in all weather. Kills 95% of targeted weeds.	New technology – needs refinement. Expensive to purchase Additional cost of plant oil extract, diesel consumption and pollution.
Hot Water / Steam	Weeds in hard surfaces, play area surfacing, non chemical graffiti removal.	Lower initial purchase cost.	Requires more treatments as heat is not held onto the plant. Diesel consumption and pollution.
Propane / Flame gun	Weeds on hard surfaces	Relatively cheap to purchase	Health and Safety Risks. Not particularly effective.
Manual Weeding	Weeds in general	Very effective if done well. Low set up costs (excluding labour).	Very time consuming. Requires large amount of labour which adds to the cost.
Mulching – bark and or membrane.	Weed control within shrub borders, under trees etc.	Improves appearance of the site and retains moisture in the soil to aid plant growth.	Can be labour intensive. May be expensive depending on supply of material.
Mowing and hand pulling	Undesirable weeds in sensitive natural habitats and on farmland	No licence required and no damage to the environment	Can be labour intensive to carry out and expensive for disposal of specific species
Nematodes	Control of pests such as slugs.	Can be very effective. Does not have the negative visual effect of slug pellets or potential harmful effect on birds.	Can be expensive.
Intensive grazing	Undesirable weeds in sensitive natural habitats and on farmland	Wildlife friendly with sufficient control	Not suitable for all ground conditions and can damage sensitive soils.
Vinegar based solutions	Weeds in hard surfaces	No licence required for application.	Has been trialled, but has not been effective. Strong smell, can give operator headache.

	In addition to the those listed above the use of electrocution has been shown to be effective on invasive non-native species and other pernicious weeds.
Legal position	<p>The Council only uses chemicals and pesticides that are licensed for use in the UK.</p> <p>Glyphosate is the active ingredient of most herbicides of which Roundup is the best known. Glyphosate is currently approved as an active substance on the EU Pesticides Database until 15 December 2023. Local authorities were therefore legally permitted to use glyphosate at the time of Brexit (and remain permitted to do so subject to any post-Brexit change of UK regulations). Its use remains subject to Health and Safety Executive regulations about its storage, supply and use.</p>
Penalties and enforcement	Not applicable for all licensed chemicals and pesticides.
References	<p>Parks for London, A Reference Guide for Integrated Weed Management in Amenity Spaces and Public Realm, March 2020</p> <p>Issues associated with the use of the herbicide glyphosate, Health and Safety Executive website</p> <p>APSE briefing: 'Glyphosate - Where do local authorities stand?', APSE, 2019</p> <p>World Health Organisations, International Agency for Research on Cancer, Q&A on glyphosate, March 2016</p> <p>London Environment Directors Network briefing on Glyphosate, unpublished, Oct 2019</p> <p>Reducing the use of pesticides, Brighton and Hove Council (ETS Committee), 26 November 2019.</p> <p>A Reference Guide for Integrated Weed Management in Amenity Spaces and Public Realm, parks for London, March 2020</p> <p>Organic Food and Drink Sales in UK, The Guardian, Feb 2020</p>

Name	Invasive non-native species (INNS)
Policy ref no.	PGSS7
Date adopted	TBA (March 2023)
Review frequency	At least every three years and sooner if there is any change to UK regulations or guidance.
Next review date	December 2025
Policy	<ul style="list-style-type: none"> • The Nature Conservation Officer will maintain a list of known INNS that are permanently present in the borough • To alert the Nature Conservation Officer to the presence of significant occurrences of any INNS. • Where possible and practicable to manage the presence of unwanted INNS with biological and organic interventions. • To maintain a record of the location of Japanese knotweed and giant hogweed on land owned or managed by the Parks Service. • To remove (or monitor the growth of) Japanese knotweed that is identified in parks and greenspaces. The preferred method for removal of Japanese knotweed is chemical injection of a suitable herbicide by an approved contractor. • Where Japanese Knotweed is being monitored it will be fenced off with appropriate signage to mitigate the risk of being accidentally spread., • Any Japanese knotweed or giant hogweed that is removed from parks or greenspaces managed by the Parks Service will be disposed of in accordance with Defra regulations. This includes that removed by private contractors. • To chemically treat infestations of oak processionary moth on trees in parks and greenspaces where this represents a significant hazard to park users. Where the hazard is considered significant, signage should be erected to warn users of its presence. • Known infestations of oak processionary moth above 3m high, or those lower than 3m that are not considered a hazard to park users, will not be treated. but will be reported to the Forestry Commission. • Action will be taken to improve plant health and biosecurity management systems into parks or greenspaces in the borough. • Enforcement or criminal action will be taken against anyone deliberately introducing INNS to Haringey parks and greenspaces.

	<ul style="list-style-type: none"> • The parks service will seek to educate and inform park users and residents about the risks associated with the introduction of INNS in parks, greenspaces (and the associated waterways). • The parks service will seek to raise awareness of the presence, risks and management of INNS by developing guidelines and advice for staff, contractors, partners and Friends groups.
Context	<p>The Wildlife and Countryside Act 1981 recognised the need to control certain species of invasive plants and animals already causing a problem in the UK, listing them in Schedule 9. Originally only giant hogweed (<i>Heracleum mantegazzianum</i>) and Japanese knotweed (<i>Fallopia japonica</i>) were listed. However, in April 2010 a further 36 plants were added onto Schedule 9 on the Act. The full list can be found here.</p> <p>Many of the listed plants are common species (such as the Spanish bluebell, virginia creeper and montbretia) often seen growing in the wild and and/or cultivated in gardens.</p> <p>Some invasive species can be particularly hazardous such as giant hogweed (which can cause series sunlight-induced burns to skin) and Japanese knotweed (whose roots can damage buildings or other built structures including paths in parks).</p> <p>Oak processionary moth (OPM) larvae (caterpillars) can also be hazardous to humans (and animals) if disturbed. The caterpillar has toxic hairs that can cause severe skin (or eye) irritation or lung irritation if inhaled. Contact is most likely to occur between May and August.</p> <p>Both plant species are known to be present in parks and greenspaces in Haringey and OPM has been found on park trees. To treat each and every occurrence would be extremely costly. A typical treatment cycle for either of these plants by a specialist contractor requires annual visits over 3-5 years and can cost in the order of £1,400+ (depending on the extent of its presence). The cost of treating OPM varies according to the size and location of the tree and the extent of the infestation.</p> <p>It is important to note that Japanese knotweed was introduced to Britain in the eighteenth century, but it still remains relatively unusual. It can survive dormant (or undetected) for decades, and may burst into life as a result of the ground being disturbed. Or it can be imported into a park in top soil or through the illegal dumping of garden waste or even inadvertently on a shoe.</p> <p>The judgement call for the parks service to make is whether there is a likelihood that any given INNS will – or may - cause harm. For Japanese knotweed this is primarily related to its proximity to buildings (or to sensitive nature conservation sites) while for giant hogweed and oak processionary moth it is the risk that people will come into contact with it.</p>

	<p>The policy position reflects the fact that the site, size, scale and risk of inadvertent spreading of any given strand of Japanese knotweed or giant hogweed or infestation of OPM should inform the action that is taken.</p> <p><u>Aquatic invasive species</u></p> <p>The Be Plant Wise campaign and guidance identifies a range of biological interventions that can be used to treat some of the word offending aquatic plants like floating pennywort and azolla..</p> <p><u>Protecting local biodiversity</u></p> <p>To support and influence the Biodiversity Action Plan, the Local Plan policies and targets etc the Council should develop and provide guidelines for Council staff, contractors, partners and friends groups.</p> <p>Such guidance might cover:</p> <ul style="list-style-type: none"> • Risk and liability - Avoiding civil liability and lessons learnt from ‘case studies’ • Budget. - understanding and estimating the cost of INNS control and choosing the right method (wrong method=more expense) • Biodiversity net gain (or loss) - Species recovery. • Planning and Development - conditions for planning applications. • Environmental impact - impact of inappropriate use of herbicide etc • INNS surveying – include in borough habitat and species survey; future-proof against encroachment onto Council land. • Ecological value and impact • Building resilience - working with key and statutory partners.
<p>Legal framework</p>	<p>Wildlife and Countryside Act 1981 (with special reference to schedule 9) Environmental Protection Act 1990 Anti-Social behaviour Crime and Policy Act, 2104 Infrastructure Act 2015 (for species control orders) <u>Guidance on preventing the spread of Japanese knotweed</u></p>
<p>Penalties and enforcement</p>	<p>Allowing Japanese knotweed or soil contaminated with the plant to spread into the wild is an offence and could result in a fine of up to £5000, or a prison sentence of up to 2 years. Homeowners who fail to control Japanese knotweed on their property can face a fine of up to £2,500.</p>

Name	Permanent lighting in parks and greenspaces
Policy ref no.	PGSS8
Date adopted	TBA (March 2023)
Review frequency	Every three years
Next scheduled review date	December 2024
Policy position	<ul style="list-style-type: none"> • For the benefit of nature conservation, parks will remain unlit unless there is a compelling reason to provide lighting • Some parks (Ducketts Common, Woodside Park, Downhills Park etc) include public footpaths maintained by Highways and these paths are lit as standard. • All decisions to install new park lighting will take account of habitats, wildlife (including bats) and nature conservation • Parks will only be lit along important pedestrian routes and between facilities in the park that are open at night and one or more park entrances • External down-lighting may be fitted to buildings in parks (including leased buildings) and temporary structures (for events etc) as a security feature • The nature of temporary lighting for events in parks will be set out in the event management plan and is managed separately to this policy. • Upward and lateral light spillage from all lights in parks will be minimised through the choice of suitable lighting designs and/or shielding • All new lights will have LED bulbs and all existing lights will have LED bulbs fitted when the existing bulb fails or as part of routine maintenance • Where possible and cost-effective solar (or dual solar battery) powered lighting should be used • New floodlighting on sports courts will minimise light spillage and have motion detectors or use other technology to prevent lighting the courts when they are not in use. • Modern floodlighting will be provided at sports courts and operated within the hours specified for within the granted planning permission.
Definitions	Lighting refers to all artificial, night time illumination in parks and greenspaces
Context	<p>Most people use parks during daylight hours when artificial lighting is not necessary. However, some parks are lit at night. This is usually for one of two reasons. Firstly, to illuminate a popular route – usually a short-cut – through a park during hours of darkness, and secondly to illuminate a route between a facility (such as a sports court or a community centre) in a park and one or more of the park entrances to enable people to attend and leave the facility.</p> <p>Twenty-two Haringey parks have at least one ‘street’ light and in total there are 278 in Council parks.</p> <p>Floodlights are also used to enable sports facilities in parks to be used at night. There are 58 floodlights across 11 parks sites.</p>

Animals that live, forage and hunt in parks at night are affected by any artificial lighting. It can affect their sleeping, feeding and their safety at night. Parks and greenspaces should be oases of night darkness in a highly-lit urban environment such as that found in Haringey.

It is because of the impact on habitats, wildlife and nature conservation that the Parks Service starts with a presumption of not having lighting in parks unless there is a compelling reason to provide it.

Where there is a request for new lighting in parks consideration must be given to the impact on habitats, wildlife and nature conservation. Any potential impact on bats in particular must be considered as they are protected by law. This includes any impact on their roosts, travel or feeding corridors. It may be necessary to undertake a preliminary ecological assessment to understand the impact that new lighting may have on bats and other wildlife.

Where lighting is provided in parks it should be provided “in a safe and efficient manner” and in accordance with British Standards. This to ensure that people can see – and avoid – hazards. All lighting in parks will be installed/commissioned by, or with the advice of, the council’s street lighting team.

Light spillage

This refers to light that is directed away from where it is required, such as light that ‘escapes’ towards the sky where it serves no beneficial purpose and may have a damaging impact on bats, birds or insects. All lighting in parks should be directed downwards and onto the surfaces where illumination is required. Light shields may be used to prevent lateral spillage if the lantern design does not achieve this.

Other options considered

Bollard lighting is used in Finsbury Park but it is used to show a routeway rather than to provide more general illumination. The Finsbury Park bollard lighting is designed to show users of the athletics track the route to the park exit with minimal impact on wildlife. Bollard lighting does light up anything above the height of the bollards and does not enable facial recognition, and is therefore less safe than lighting on lamp posts.

A case can be made not to light parks at all, and that they should not be used for short cuts at night (or in the early morning while it is still dark). There would be a benefit to wildlife, and indeed most parks are not lit. But some are and will be used at night, and not lighting them would present a risk to the safety and wellbeing of those who choose to walk through.

Park lighting at night could be limited to set hours, so that there is no lighting between, say, 1am and 5am (roughly when the Underground stops and start running). Remotely controlling individual lights will

	become possible, subject to funding, once the Centralised Lighting Management System(CMS) is implemented. It may be possible to pilot this approach once the CMS system is functioning.
Legal position	The Council is not required to provide lighting in parks or greenspaces. Wildlife and Countryside Act, 1981 The Conservation of Habitats and Species Regulations 2017
Penalties and enforcement	Not applicable.
References	Campaign for Rural England campaign for dark skies

Name	Closed Circuit Television (CCTV) cameras in parks and greenspaces
Policy ref no.	PGSS9
Date adopted	TBA (March 2023)
Review frequency	Every three years or if relevant legislation changes
Next scheduled review date	October 2025
Policy position	<ul style="list-style-type: none"> • CCTV camera surveillance will be avoided in parks unless there is an identified need to support community safety and/or to tackle localised crime or anti-social behaviour or to protect buildings or structures in parks. • CCTV will be utilised at operational depots to deter theft from depots and buildings. • Temporary CCTV cameras may be used in parks to deter and/or collect evidence in relation to fly-tipping, anti-social behaviour or suspected criminal behaviour in parks. • Temporary CCTV cameras may be used during permitted events in parks. • Permanent CCTV cameras will only be used in parks where there is a clear need for a permanent installation. • The use of CCTV in parks will be in agreement with the council's Community Safety team. • All Council CCTV cameras in parks should be part of the corporate CCTV system and linked to the borough CCTV control room. • Signage will be displayed where Council CCTV cameras may capture images of park users. • CCTV cameras should be removed (or decommissioned) if they are no longer needed in that location. • Where leased buildings or facilities in parks are protected by CCTV cameras on local or private networks, the leaseholder is responsible for ensuring that the use of CCTV is compliant with data protection legislation and guidance from the Information Commissioners Office.
Definitions	A CCTV camera is any recording device used to collect images that may be stored for a defined period.
Context	There are an estimated 4-6 million CCTV cameras in the UK. They can be found in most public places, such as in shopping centres, tube stations, buses, museums, sports stadia and numerous public buildings.

Generally public parks have few, if any, CCTV cameras. This is because parks are safe places without the need for CCTV surveillance of park users. Survey evidence indicates that the vast majority of park users feel safe in parks, especially during the day, so CCTV cameras are rarely needed.

However, there are some circumstances in which it may be appropriate to install CCTV in parks. The more likely reasons are:

- To deter flytipping in 'hotspots' and/or to collect evidence about fly tippers
- To deter anti-social behaviour in 'hotspots' and/or to collect evidence about perpetrators
- To deter suspected criminal behaviour and/or to collect evidence about perpetrators
- To protect parks buildings by acting as a deterrent and/or to provide evidence about perpetrators.

Permanent CCTV cameras have been located in Finsbury Park, Down Lane Park, Ducketts Common and Russell Park. These are all in response to crime prevention and community safety. In terms of parks and greenspaces these are very much the exception rather than the rule.

Temporary (or "redeployable") CCTV cameras have been (or are) deployed in some parks to address local issues. These include a site in Markfield Park that has regularly been used for unlicensed music events (UMEs) that cause noise and nuisance to local residents and litter and damage within the park. Another example is associated with a pattern of drug dealing and anti-social behaviour within and by the entrance to another park. In both cases the planned deployment is temporary.

CCTV cameras have long been used in fly-tipping hotspots around the borough and have been used to spot and/or deter flytipping in hotspots near park entrances such as on Netherton Road by the entrance to Tewkesbury Road Open Space in Seven Sisters.

Decisions to deploy temporary CCTV cameras are usually made through the joint council/police Partnership Problem Solving Group if other solutions to address anti-social behaviour, crime etc have not been effective. At the time of writing the Council has 26 redeployable cameras for such use for the whole borough, so the opportunity for using redeployable cameras in parks will be limited by their availability.

Where CCTV is installed, there should be a presumption that it is temporary unless otherwise stated at the time. If a problem is resolved through the use or presence of a CCTV camera it can be removed and redeployed to another site (in parks or elsewhere) where the camera can be put to better use.

Public support for CCTV in parks has not been formally tested borough-wide, but 77% of people responding to a survey in 2019 about

	<p>improvements in Finsbury Park agreed or strongly agreed with the introduction of CCTV in the park.</p> <p><u>Use of CCTV evidence</u></p> <p>The use of CCTV evidence is carefully controlled and subject to legislation and guidance from the Information Commissioner’s Office (ICO). The Council will provide the CCTV images to the police if they are needed for the investigation or prosecution of a crime. The Council will not provide them to anyone else, unless they are entitled to them under the Data Protection Act. More detail on CCTV and data protection can be found on the council web site.</p> <p><u>Council policy and practice</u></p> <p>Haringey Council uses CCTV cameras in various locations in the borough to help prevent and detect crime, antisocial behaviour and disorder and to help enforce traffic and parking regulations. CCTV images may be provided to the police if they are needed for the investigation or prosecution of a crime. It is Council policy not to provide CCTV images to anyone else unless they are entitled to them under the Data Protection Act. The images collected from any Council CCTV cameras in parks are subject to this policy.</p> <p><u>Leased buildings in parks</u></p> <p>In some parks, buildings are leased to third parties, such as cafes or community centres. The leaseholders may choose to use CCTV to protect their property etc. Where this is the case the leaseholder is responsible for ensuring they are complying with the requirements of the Data Protection Act and the requirements of the Information Commissioner’s Office. This includes ensuring that the CCTV cameras do not collect images of park users who are not within the curtilage of the leased premises.</p>
Legal position	<p>The Data Protection Act 1998 governs the use of CCTV equipment and any data produced or stored by it.</p> <p>Where covert surveillance by CCTV is intended or anticipated, this requires authorisation under the Regulation of Investigatory Powers Act 2000</p>
Penalties and enforcement	Not applicable.
References	<p>CCTV, freedom of information and data protection in Haringey, LB Haringey, Nov 2020 (last updated)</p> <p>Installing CCTV: things you need to do first, Information Commissioners Office</p>

Name	Vehicles in parks and greenspaces
Policy ref no.	PGSS10
Date adopted	TBA (March 2023)
Review frequency	Every three years
Next scheduled review date	December 2025
Policy position	<p><u>Strategic outcomes</u></p> <ul style="list-style-type: none"> • Provide a safe walking experience for users of our parks • Promote safe and responsible cycling within our parks • Minimise the movement of private and operational vehicles within our parks • Reduce the speed of all vehicles within our parks <p><u>General</u></p> <ul style="list-style-type: none"> • We encourage people to visit our parks and greenspaces using sustainable modes of transport (ideally by foot or cycle or using public transport) • The safety of pedestrians and wheelchair users is the primary obligation of anybody in control of a vehicle inside a park or greenspace. • The speed of all vehicles in parks should not exceed 10mph, except Finsbury Park where there is an old bye law stipulating a 12mph limit <p><u>Powered vehicles</u></p> <ul style="list-style-type: none"> • Powered vehicles (including cars, vans, motorcycles are personal powered vehicles) are not permitted in parks and greenspaces with the following exceptions: <ul style="list-style-type: none"> • Parks and other Council service vehicles driven by authorised staff • Parks staff arriving at or leaving work who are driving to an authorised parking bay within a dedicated staff depot • Contractor vehicles where works are being undertaken on behalf of the parks service • Third party contractors and utilities where access has been agreed in writing with authorised parks staff • Event set-up or take-down where access has been agreed in writing with authorised parks staff • Authorised filming in parks and greenspaces • Leaseholders of premises in parks where this is permitted in the lease <ul style="list-style-type: none"> • Deliveries to leaseholders where this is permitted in the lease

- Contractors working on behalf of site leaseholders where this has been agreed in writing with authorised parks staff
 - Other permitted events and activities (such as for filming or special event) where access has been agreed in advance in writing with authorised parks staff
 - Blue badge holders and taxis who are transporting disabled people to or from organised activities/events in parks (or to an authorised parking bay)
 - Emergency services' vehicles
 - Public use where car parking is permitted and only on the roadway to and from the car park
 - Mobility scooters.
- Drivers of permitted powered vehicles should be mindful of other park users, and must be in full control of their vehicle, at all times.
- Journey distances and the time spent within parks and greenspaces should be minimised and/or confined to wide carriageways.
- Powered vehicles must be driven at no more than 10mph in parks except Finsbury Park where there is a bye law stipulating a 12mph limit
- Powered vehicles on footpaths should have hazard lights on at all times, and right of way must always be given to pedestrians (and cyclists).
- Vehicles should not be driven on grass or other soft surfaces except where this is required to undertake work in the park.
- Authorised vehicles should park in dedicated parking bays/places where available.
- The engine of any authorised parked vehicles must be turned off when stationary, waiting or parked in a park. Keys should be removed from the ignition.
- Where public car parking is provided, parking bays must be used and the owner/driver of the vehicle must not leave the park while the vehicle remains parked.
- Vehicles must not be left overnight (other than within a locked, secure area or other area as agreed in writing in advance with the council).
- The Parks Service does not provide car parking for park users, though it may provide parking for authorised on-site users and blue badge holders.
- Blue badge holders (or taxis carrying a disabled passenger) may only enter the following parks and must use an authorised parking bay or drop off point:

- Finsbury Park
- Markfield Park
- Lordship Recreation Ground (for activities at the Hub only)
- Chestnuts Park (to access Chestnuts Community Centre only)

- Caravans and camper vans are not permitted in any park or greenspace, unless they are part of a permitted event, managed through the Outdoor Events Policy.
- Parking enforcement services may be used to manage parking in parks.

Bicycles

- Bicycles and cyclists are welcome in all Council parks and greenspaces, but cycling is not permitted in local nature reserves and ancient woodland (Parkland Walk, Queens Wood, Railway Fields, Coldfall Wood and Bluebell Wood) that are managed by the council, other than on permitted, signed routes. These sites are not to be used for mountain biking, BMX or other 'off-road' cycling.
- Cyclists should stick to roadways and paths or other designated areas for cycles. Cycling on the grass or other soft surfaces should be avoided, especially in wet or muddy conditions.
- Bicycles must not be cycled in excess of 10mph anywhere within Council parks and greenspaces.
- Cyclists should be mindful of other park users, and in full control of their cycle, at all times. At night they should have lights and be visible to other park users.
- Bicycles should be locked if left unguarded. Bicycle stands are provided in most larger parks.
- Hire cycles (such as Santander, Uber, Lime cycles etc) should not be left in parks. They may be left on highways near the park entrance.

E-scooters, power assisted bicycles and other powered personal transport

- Electric scooters, and other powered personal transport methods are not permitted.
- Power assisted bicycles are permitted provided they are cycled responsibly and within specified speed limits.

Skateboards, roller blades and roller skates

- Skateboards, roller blades and roller skates should only be used in designated skate parks, or locations away from pedestrians and other park users.

	<p><u>Scooters</u></p> <ul style="list-style-type: none"> • Push scooters may be used on pathway in parks but with care and attention and at no more than 5mph. • Young children on push scooters should be supervised by a responsible adult.
Definitions	<p>Vehicles relate to all wheeled vehicles or means of propulsion with the following categorisation:</p> <ul style="list-style-type: none"> i) Powered vehicles - all powered vehicles for one or more person. This includes, but is not limited to, motorcycles and mopeds, e-bikes, electrically assisted cycles, Segways and e-scooters, cars and taxis, camper vans, caravans, vans, trucks and lorries, quad bikes and powered buggies ii) Cycles - pedal-powered vehicles including bicycles, tricycles, cargo bikes etc iii) Other self-propelled 'vehicles' - including push-scooters, skateboards, roller blades and roller skates.
Context	<p>The principle underlying this policy document is that the safety and enjoyment of parks by pedestrian and wheelchair users is of primary importance. Vehicle users in parks (including cyclists) must ensure that this principle is achieved.</p> <p>This policy sets out the purposes for which vehicles may use parks and how such vehicles should be driven (and parked) responsibly and safely.</p> <p>Most motorised vehicles are noisy, and all can be driven at speeds that could be a danger to park users. However, it would not be practical (or desirable) to ban all motorised (or unmotorised) vehicles from parks. Service vehicles are essential to the smooth-running of parks as are those of contractors and others providing a service.</p> <p>Private motorised vehicles are not permitted in parks unless they have been explicitly authorised (e.g. to undertake planned works or in connection with an authorised event or activity) or if this is explicitly permitted via signage. Currently only Markfield Park has vehicle parking on site.</p> <p>Most park users live within walking distance. We encourage people to travel to and from parks by foot or cycle as these are the most sustainable and greenest forms of transport. A survey in 2020-21 found that nine in ten park users walk or cycle to the park. Five percent of those surveyed said they drive. Park visitors who do choose drive to our parks should find a car park or street parking nearby.</p> <p>Caravans and camper vans are not permitted in parks at any time. This is also covered by the policy on camping (and rough sleeping) in parks.</p>

Disabled park users who hold a blue badge may park in designated areas in a small number of parks. Blue badge holders may also park, without charge, close to park entrances park in resident parking bays, pay by phone bays, and in shared use bays administered by Haringey Council.

Authorised vehicles in parks

The drivers of authorised vehicles in parks must be highly alert to park users (including children and dogs) and adhere to speed limits at all times. Park users do not expect to encounter vehicles and may be unaware of its presence. The responsibility for the safety of park users is entirely with the driver of the vehicle.

As well as being a potential hazard to park users, vehicles can cause damage to the grass and other soft areas if driven across them. Tyre tracks are sometimes seen on the grass adjacent to narrow paths especially after wet weather. Although the grass will recover it is unsightly, often becomes muddy and attracts puddles after further rain. The driver of all authorised drivers in parks must keep to roads and tarmac paths wherever possible to minimise this damage. Where this is unavoidable mats or other temporary protection should be used to protect the grass.

Disability access

In two of the larger parks (Finsbury and Markfield) blue badge drivers are able to enter the park and park in a designated parking bay. Taxis carrying disabled passengers are also able to enter these parks to drop off (and collect). They may take disabled passengers to events at the Hub in Lordship Recreation ground and the community centre in Chestnuts Park provided they adhere to the guidelines set out above. Access should be pre-arranged with the service provider at the Hub or Chestnuts Community Centre.

Bicycles and cyclists

As well as destination for cyclists, parks are often used as a safe, off-road short cut and some parks are part of established cycle networks. While cyclists are welcome in parks, they must respect other users and travel at low speed, especially on shared paths when other pedestrians (or dogs, children etc) are nearby.

Electronic cycles have the capacity to go at high speed. They are permitted in parks if cycled responsibly and at low speed.

Skateboards, roller blades and roller skates may not be thought of as 'vehicles', but the user may be travelling fast and may not be in control. A collision with a pedestrian could result in serious injury (for both parties). Some larger parks have dedicated skate parks which are intended for such activities. There is byelaw prohibiting roller skating on public footways in Haringey.

	<p>Small children may ride a bike or a push-scooter in parks, but they must be supervised by a responsible adult who is mindful of other park users. Even a small child at low speed can cause a serious trip or fall. If there isn't space, or a path is busy, the responsible adult should not permit the scooter or bicycle to be used.</p> <p><u>Local nature reserves and woodland</u></p> <p>Off-road cycling is not permitted in the council's local nature reserves and woods. This is to protect the habitats of such sites but also for the safety of other users. Cycling is presumed not to be permitted in such sites, though cycling may be allowed where signage specifically permits cycling.</p> <p><u>Powered transporters</u></p> <p>By law powered transporters including e-scooters, Segways, hover boards etc are permitted neither on roads nor on pavements or other pedestrian areas (by section 34, Road Traffic Act 1988). These vehicles are therefore not permitted in parks and greenspaces.</p>
Legal position	<p>Park roads are roads accessible to the public and therefore relevant traffic laws apply. Where there are no lamp posts, park roads are not automatically restricted roads; but the Council as highway authority can by order under s84 of the Road Traffic Regulations Act 1984 impose speed limits on such roads (where it has not already done so), with appropriate signage.</p>
Penalties and enforcement	<p>Members of Council staff who do not comply with the vehicle policy will be warned about future behaviour and may be subject to disciplinary action.</p> <p>Contractors and other authorised users who do not comply with the policy will be warned and may be subject to penalties under the terms of their contract or to have their contracts terminated.</p> <p>Unauthorised users of motorised vehicles in parks will be reported to the police and may be subject to criminal proceedings.</p> <p>Where covered by legislation or bye-laws enforcement action may be taken by the council's Enforcement Team.</p> <p>Unauthorised parked vehicles in parks may be clamped or towed away without warning.</p> <p>LB Haringey Byelaws, January 1976 do not prohibit cycling on footpaths (unless there is visible signage to this effect)</p>
References	<p>Powered transporters - www.gov.uk/government/publications/powered-transporters/information-sheet-guidance-on-powered-transporters</p>

	Guidance on electrically assisted bicycles - www.gov.uk/government/publications/electrically-assisted-pedal-cycles-eapcs
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Name	Sustainable waste management policy for parks and greenspaces
Policy ref no.	PGSS11
Date adopted	TBA (March 2023)
Review frequency	Every three years
Next scheduled review date	December 2025
Policy position	<p>The Council aims to keep its parks and greenspaces clean, tidy and predominantly free of litter.</p> <p>The policy position underpinning this aim is:</p> <ul style="list-style-type: none"> • To minimise the amount of waste generated in parks (including green waste) • To maximise the amount of waste recycled or taken home by park users • To minimise the cost of collecting and disposing of waste in parks • To review processes so that litter and waste is dealt with more efficiently • To work with the community to educate and encourage people not to litter in parks • To encourage community groups and volunteers to litter pick and act as champions for non-littering • To take action against those who drop or leave litter in parks • To take action against those who fly tip and dump bulky waste in parks • To remove all dog waste bins (as all waste goes into the same waste stream)
Definitions	<p>Waste – items (such as containers, wrappers, bottles) brought to (or purchased in) parks by park users that are no longer wanted by the user</p> <p>Litter – unwanted waste in parks that is not taken home or disposed of in an appropriate receptacle.</p> <p>Waste stream – the process by which waste reaches the point where it is eventually destroyed (though burning or landfill etc)</p> <p>Recycling – waste that can be removed from the waste stream and reused or repurposed before it is eventually destroyed</p> <p>Green waste – loose waste resulting from the vegetation growing in (or beside) the park such as leaves, twigs, seed pods that is locations where it is unwanted</p>
Context	<p>This policy will be underpinned by a delivery plan that is under development (as June 2022).</p> <p>The delivery plan will be in relation to all waste (both unwanted and recyclable/reusable) that is generated in parks and greenspaces managed by the Parks Service. This includes waste brought to the park or generated by:</p>

- | | |
|--|---|
| | <ul style="list-style-type: none">- users and visitors to parks and greenspaces (including those passing through)- by cafes and other food and drink outlets in parks and greenspaces- events held in parks and greenspaces.- dog owners (bagged dog poo)- council staff and contractors in parks and greenspaces- grounds maintenance and tree works in parks and greenspaces.- fly tipping or dumping of waste inside parks and greenspaces that was generated outside the park or green space.- existing waste that is currently stored/accumulated within parks and greenspaces. |
|--|---|

The aim is to reduce (and minimise) the amount of waste in parks the Council has to process, and to reduce (or minimise) the cost of processing that waste.

Name	Amplified music and speech in parks
Policy ref no.	PGSS12
Date adopted	TBA (March 2023)
Policy	<ul style="list-style-type: none"> • Loud amplified music is not permitted in parks or greenspaces unless previously agreed as part of a permitted event or activity in the park. • Unlicensed music events in parks or greenspaces are not permitted. • Other loud and continuous noise in parks or greenspaces are not permitted unless they are caused by machinery required for maintenance of the park or its assets, or the set up (or take-down) of a permitted event. • Anti-social noise in parks or greenspaces should be reported to the council's noise team or by calling the police on 101.
Context	<p>People visit parks for lots of reasons, but one is for peace, tranquillity and relaxation. They do not want to be subjected to continuous sounds – especially continuous, loud sounds – that they would not expect to hear when they set out on their journey to the park. This includes amplified music arising from other park users.</p> <p>The other view of this is that some people may want to listen to music whilst enjoying the park, perhaps with a couple of friends on a warm day with a cooling breeze and a cold drink.</p> <p>However, the Parks Service view is that if someone plays amplified music in a park, they may be the only person enjoying it but many of those within the radius that the music can be heard are likely to be disturbed and/or annoyed by it. It is not enough to say that those people who don't like it should move away or complain. The whole park is for the enjoyment of all and should not be spoiled by a minority. It is a matter of respecting other park users.</p> <p>The same applies to buskers or those entertaining themselves with musical instrument(s) and/or a microphone attached to an amplifier.</p> <p>This is the interpretation of Council byelaw 5 that says that “any person [causing] a noise which is so loud and so continuous or repeated as to give reasonable cause of annoyance to other persons ... shall be guilty of an offence”.</p> <p>The Council view is that private individuals should not play loud amplified music (or speech – see below) in parks unless they have obtained a permit to do so in advance – for example for a permitted outdoor exercise class.</p> <p><u>Amplified music at licensed events</u></p> <p>The Council permits events in parks from small community gatherings to music festivals with 50,000 in attendance. Amplified music (and speech) is permitted if the event organiser has requested it and it has</p>

been agreed in advance by the parks service as an agreed condition of the event, subject to the start and end times in the agreement.

Where a premises license is required to provide regulated activity for a major event, the council's licensing team will always specify the times (and dates) between which amplified music may be played and how loud it may be. They may monitor the volume and insist it is turned down or off if it breaches pre-agreed sound levels or timings.

Unlicensed music events (UMEs) in events

Parks have sometimes been used as locations for unlicensed music events, such as parties or raves, usually at night. These events often involve loud music and a large - usually paying - clientele. They are not licensed or authorised by the Council and should be stopped, ideally before the loud music starts. Anybody witnessing (or suspecting) a UME in a park or green space should report it to the council's noise team on 020 8489 1335 (or 020 8489 1000 at night) or the police on 101.

Amplified speech

Nuisance to park users can be caused by amplified speech such as radios or podcasts that are played through a loudspeaker to political or social campaigning that may be made through a megaphone or a microphone. If it is amplified, it is likely to cause nuisance.

As with loud amplified music if it has been authorised as part of a planned event in a park it is permitted.

Other loud sounds

It is worth noting that a visit to a park is rarely noise-free. There may be shouts from children playing or a dog being called back; or the scream of a siren from a passing emergency vehicle. These are for the most part short-lived bursts of sounds and to be expected in any park in an urban setting.

If maintenance works are being undertaken in the park there may be the hum of a mower or even the scream of chainsaw. These are unavoidable if the park is to be well maintained.

It is possible that other loud and ongoing sound that is not amplified (such as drumming or repeated chanting) causes annoyance to park users. This policy cannot legislate for every sound in parks but if it can reasonably be considered to cause annoyance to others (ie as set out in the byelaws for the borough) it is not permitted.

Noise reporting

Parks staff may ask people to turn off loud music but they do not have the powers to prevent the noise or to fine or arrest the perpetrator.

	<p>The council's noise team will respond to complaints about noise throughout the borough including in parks. They can be contacted on 020 8489 1335 during office hours and on 020 8489 0000 between 6pm to 2am Thursday to Sunday. More details are available at https://www.haringey.gov.uk/environment-and-waste/noise-and-animal-control/noise-control</p> <p>Anti-social behaviour can be reported to the police on 101 but the speed of response will depend on other calls and priorities at the time.</p>
<p>Legal framework</p>	<p>Noise Act, 1996 (relates to buildings and licensed premises) Environment Protection Act, 1990 (s79-80) LB Haringey byelaws – Good Rule and Government 14th November 1975</p> <p>The council's byelaws include a byelaw relating to “Wireless sets, gramophones etc” which is still relevant as it states that:</p> <p>“Any person who by operating or causing or suffering to be operated any wireless set, gramophone, amplifier or similar instrument in or on any street or public place makes or causes or suffers to be made any noise which is so loud and so continuous or repeated as to give reasonable cause of annoyance to other persons ... shall be guilty of an offence”.</p> <p>Byelaw 5 under s.235 of the 1972 Local Government Act , confirmed by the Secretary of State on 14 November 1975. Under the Anti-social Behaviour, Crime and Policing Act 2014) a Community Protection Notice can be served on an individual (or body) where the conduct of the individual (or body) is having a detrimental effect, of a persistent or continuing nature, on the quality of life of those in the locality, and the conduct is unreasonable. This particularly applies, but not solely, where it is commercial.</p>
<p>Penalties and enforcement</p>	

Name	Camping and sleeping rough in parks and greenspaces
Policy ref no.	PGSS13
Date adopted	TBA (March 2023)
Review frequency	Every three years
Next scheduled review date	October 2026
Policy position	<ul style="list-style-type: none"> • Tents may not be pitched for overnight use in parks and greenspaces owned by Haringey Council without the express permission of the council. • Parks staff will try to engage with anyone with a tent pitched in a park or greenspace to establish if they are experiencing homelessness or not. • Any person experiencing homelessness known or seen to be sleeping overnight in a park or green space (whether or not in a tent) should be reported to local outreach services via StreetLink (London). The report can be made by anyone including park users and parks staff. • Following a visit(s) by outreach workers, enforcement action will be taken against any person sleeping rough in a park or greenspaces who refuses to leave having been offered help. • Vacated/abandoned tents and other discarded items (mattresses, clothing etc) used by people experiencing homelessness should be reported to the Hygiene Team to clear. If known to the service, the person sleeping rough should be given the opportunity to clear the site within 24 hours after which time the Hygiene Team will clear the site. Anything that has been abandoned and/or that may present a danger to park users will be removed immediately. • Any person camping in a park or greenspace (who is not homeless) must take their tent down and leave immediately on being asked to do so by an authorised officer. Refusal to remove the tent may be treated as fly tipping (and treated accordingly); refusal to vacate the tent will be regarded as trespass (and will be treated accordingly). • Caravans and camper vans are not permitted in parks at any time (see vehicle policy) and therefore may not be used for overnight stays.
Definitions	<p>Sleeping Rough is defined by the Government as “people sleeping, or bedded down, in the open air (such as on the streets, or in doorways, parks or bus shelters); people in buildings or other places not designed for habitation (such as barns, sheds, car parks, cars, derelict boats, stations, or ‘bashes’)”.</p> <p>Homeless – There are many forms of homelessness, but for the purpose of this document it is defined the same as “Sleeping Rough” above.</p> <p>Camping is defined as an outdoor activity involving overnight stays away from home in a shelter, such as a tent.</p>

	<p>Many homeless people use a tent for shelter. For the purposes of this document this is considered to be sleeping rough as the homeless person is not camping “away from home”.</p> <p>An authorised officer is a police officer or an officer of the Council employed by the enforcement team.</p>
Context	<p>During 2021-22 a total of 268 people were seen by outreach services to have slept rough in Haringey. This was 34% less people than the previous year. 62% were new to the borough and nearly all (87%) were men.</p> <p>People sleeping rough are often found in parks and greenspaces. More are found in parks and greenspaces in summer than in winter.</p> <p>The council’s Rough Sleeping Strategy 2018 provides more detail on the causes of (and action that can be taken to address) people sleeping rough. What is clear is that a variety of issues and reasons may lead a person to sleep rough in a park or green space. The most obvious reason is that they have no permanent place to sleep and they are homeless. A park or green space may offer more safety, privacy or tranquility to a person who is homeless than many other outdoor places.</p> <p>However, this should not be a reason to encourage people to sleep rough in parks and greenspaces.</p> <p><u>Why don’t we let people sleep rough in our parks?</u></p> <p>People sleeping rough are often without income and risk being drawn into exploitative situations such as prostitution, begging, anti-social behavior, or crime. It is a dangerous and isolating experience. People sleeping rough are more likely to be victims of crime and almost 17 times more likely to have been victims of violence (in the past year compared to the general public). Women are particularly vulnerable, nearly 1 in 4 have been sexually assaulted whilst rough sleeping.</p> <p>35% of known people sleeping rough in Haringey in 2021-22 misused alcohol and 33% had drug dependency. Alcohol and drug misuse can lead to anti-social behavior and for broken glass and drug paraphernalia (including syringes) to be discarded in the park. This again represents a health and safety risk to park users and to animals.</p> <p>Nearly half (48%) of people sleeping rough who had an assessment following outreach contact had mental health concerns. Prolonged periods of rough sleeping have a significant impact on someone's mental and physical health. The longer someone experiences rough sleeping for, the more likely it is they will develop additional mental and physical health needs and substance misuse issues.</p> <p>Most parks do not offer toilets (and those that do are usually closed at night). A person sleeping rough in a park may have no choice but to use the grounds as a toilet. This is not acceptable and represents a risk to</p>

the health of other park users and a cost to the Parks Service in clearing up (see policy on toilets, defecation and urination).

Historically, if one person sets up a tent, then other people will do the same nearby (often as this give a sense of security /safety in numbers) The unfortunate result is that all the issues outlined above are compounded, and it becomes far more difficult to engage with them and move them into accommodation.

However, even if a person who sleeps rough presents none of the concerns listed above, we still have a duty of care towards them. There are a range of services and support for individuals in these circumstances (see below). Outreach workers can link them to these, which range from temporary housing solutions to help with benefits, treatment for physical and mental health problems and support for drug and alcohol misuse and more.

Most people who sleep rough in Haringey (56%) are not from the UK. Many become homeless simply because they do not have the language skills to access services. The sooner they are reported via StreetLink, the sooner their specialist outreach teams are able to communicate and link them to services that they had hitherto been unable to access.

What to do if you are encounter somebody sleeping rough

The following is provided for anyone wanting to know how to contact outreach services. If you are sleeping rough or are aware of somebody sleeping rough, you can either:

1. Alert the local authority and outreach services by making a referral to Streetlink on 0300 500 0914 or via the StreetLink phone app. Streetlink is run in partnership between Homeless Link and St. Mungo's that connects members of the public and their knowledge of rough sleepers, to the local services.
2. Support or advise the person to present as homeless at a Haringey Council Customer Service Centre at either Wood Green Library or Marcus Garvey Library
3. Mulberry Junction, 332 High Road, N15 4BN provides a range of drop-in services for single homeless people aged (18-50) from a hot shower to advice and support.

Camping in parks

Occasionally people set up have set up unauthorised overnight camps in parks. Most commonly this is during major events in the vicinity (such as a major music event in Finsbury Park or a concert at the Emirates Stadium for example) and takes place in the summer.

In addition to the hygiene and safety issues referred to in the section on sleeping rough, camping may cause damage to the park through the pitching of a tent and trampling of vegetation. It is likely to lead to littering

	<p>and potentially to the use of fires or cooking in the park, both of which are not permitted.</p> <p>Camping may be permitted as part of an arranged event under the Outdoor Events Policy. This is only with the express permission of the council.</p>
Legal position	<p>The Vagrancy Act 1824 still applies.</p> <p>A Public Spaces Protection Order (PSPO) could be developed to create a clear framework of penalties and enforcement for unauthorised camping</p>
Penalties and enforcement	<p>See Legal position.</p>
References	<p>Haringey Rough Sleeping Strategy, 2018 Combined Homelessness and Information Network reports, https://data.london.gov.uk/dataset/chain-reports</p>

Name	Toilets, urination and defaecation in parks and greenspaces
Policy ref no.	PGSS14
Date adopted	TBA (March 2023)
Review frequency	Every three years
Next scheduled review date	December 2025
Policy position	<ul style="list-style-type: none"> • Public toilets, including at least one accessible toilet, will be provided in the three district (A2) parks (Finsbury Park, Lordship Recreation Ground and Queens Wood). • Public toilet facilities will be provided in local (A3) parks where possible • Public toilets will not be provided in A4 (small site) parks and greenspaces but may be available nearby. • Changing Places toilet facilities will be provided in A2 (district parks) from 2022. Access may be via key, keypad or other means. • Toilets in parks should be clean, working, serviced and safe and inspected as part of routine park inspections. • Toilets in parks will include contact details for reporting defects or missing consumables • New toilets in parks will be provided and maintained by on-site providers or leaseholders (e.g. café or community centre etc). • The opening hours of toilets in parks will vary from park to park, with the normal opening hours published, but they will be locked at night unless otherwise stated • Smoking, drinking, drug use, sexual activity and other anti-social behaviour are not permitted in park toilets. • Signage to and information about public toilets in (or near) to parks will be provided • Defaecation in parks and greenspaces is neither permitted nor tolerated • Urination in parks is not permitted • Human faeces found in parks will be removed within 24 hours if reported to the Parks Hygiene Team.
Definitions	<p>An “accessible toilet” is designed for people with physical disabilities and/or mobility impairment. The toilet is larger than a standard cubicle (to provide movement for a wheelchair and/or space for a carer) has a raised toilet bowl, grab rail(s) and a wide door.</p> <p>“Changing Places” toilets are designed for people who are unable to weight-bear and who therefore need to be changed or help to use the toilet. As well as a toilet with support bars, Changing Places units have a changing bench and a hoist to assist with lifting. They also have a shower and wash basin</p>
Context	<p>This policy document deals with two related issues:</p> <ol style="list-style-type: none"> a) The provision of toilets in parks b) The use of parks by some people as a toilet

Toilets in Parks

We recognise that for many the provision of toilets in parks is an access issue. Without toilets, suited to the needs of the individual, a park becomes inaccessible to many residents.

In an ideal world all local parks would have public toilets for their users. Over the years some have closed due to vandalism, misuse or an inability to maintain it. Other parks were too small to justify the expense of a public toilet and never had one.

We have retained public toilets in some parks and have ensured that toilets are available to park users in other by making them available in cafes or community buildings in the parks.

We aim to provide toilets in the larger parks as they are more likely to be destinations to which users travel more than, say, 10 minutes from home. For this reason we try to provide toilets, at least during the main body of the day, in our larger parks.

Public toilets should be safe, lockable, clean, well-lit and supplied with the essentials (paper, soap and water and a means of drying hands and disposing of towels (if offered) as a minimum. Where possible we aim to provide sanitary waste disposal facilities and if space permits a baby change area and suitable disposal arrangements.

Where possible the Council will try to provide separate male and female toilets, but this is not always possible because of limitations of existing buildings and/or cost. Where shared-use toilets are provided cubicles will be lockable, secure and private. Accessible toilets in parks are not gender-specific may be used by anyone.

Where male and female toilets are provided in a park, trans-gender people may use the toilet that they feel is most appropriate to them.

We are aware of the importance of the need for suitable facilities for adults and children with disabilities who are unable to weight-bear or who cannot use a toilet and have to be changed. We have committed to installing a Changing Places toilet and changing facility in two of our three main parks - Finsbury Park and Lordship Rec - before the end of 2022. A facility will be provided in the third (Queens Woods) when funding permits. We think this will improve the quality of lives of numerous people and that these parks will become destinations for people with such disabilities and their families and friends.

Where we have cafes in parks with toilets, the café leases always include a clause permitting public use of toilets during the advertised opening hours, whether or not the user is a customer of the café. This currently includes: Bruce Castle Park, Chestnuts Park, Downhills Park, Down Lane Park, Ducketts Common (from 2021), Finsbury Park, Lordship Rec, Markfield Park, OR Tambo Rec, Priory Park, Queens

Wood and Russell Park. The lease requires the toilet to be kept clean, hygienic and supplied with consumables.

Most park toilets are, and will be, within staffed buildings (such as cafes) and only open during the building opening hours. This improves the security and management of the toilets, but the downside is that they may not be available early or late in the day. The normal opening hours of the toilets will be published.

Planned or unplanned closure of toilets may be unavoidable due to anything from planned repairs to floods or other unexpected events. The Council will try to alert park users and signpost the nearest alternative toilets in these circumstances.

People should know whether a park has toilets and where they are. Signage and information should be provided at obvious locations (such as on noticeboards). If toilets are in cafes signage should explain that any park user may use the toilet. The Council will provide such information, but the extent of signage may be subject to available budgets.

Many parks without toilets are located within reach of other places with public toilets, such as libraries and community centres that provide public toilet facilities. For example, [Hornsey Vale Community Centre](#), which is less than 100m from Stationers Park, offers its toilet facilities to park users when the centre is open, and [St Ann's Library](#), which is about 500m from both Chestnuts Park and Paignton Park. Where there is no toilet in the park, the Council will try to signpost other nearby facilities and opening hours. Local cafes and restaurants are usually willing to offer their toilets to non-paying customers who are in distress.

Inappropriate use of toilets in parks

Over the years public toilets nationally have attracted some more negative connotations such as being dirty, broken vandalised or being associated with drug use or sexual activity. One of the reasons for aiming to locate park toilets in staffed buildings is to avoid any of these issues.

To deter inappropriate use of and vandalism to self-contained toilets in parks (such as those in Finsbury Park) they will be locked at night and visited daily to ensure they are functioning and suitably supplied.

Temporary toilets

When events are held in parks it may be necessary to temporarily increase the toilet capacity to meet the needs of the expected attendees. This will be considered at the time the event is planned. The event organiser will be required to make additional provision and to empty and remove the temporary toilets after the event. This is covered by the event application process

Covid and public toilets

During the lockdowns of 2020 and early 2021 most public toilets were closed including those in parks. They were only kept open where social distancing and adequate hygiene precautions could be exercised. This included sanitising taps, handles, doors and other touch points. Inevitably this meant that many park toilets remained closed, and the consequences – especially in the summer of 2020 – was that the park became used as toilets.

Managing the provision of toilets in the event of future lockdowns will require consideration of the future design of toilets and toilet facilities.

Alternatives toilet facilities considered

Consideration has been given to building self-contained toilet blocks in some larger parks, but the capital and maintenance costs are prohibitive.

The use of prefabricated, stand-alone toilet units in parks (such as the 'sanisette' and other brands) has been considered but again the purchase cost and maintenance are too high. They need to be sited near to power and water and sewerage lines, which in parks is usually close to existing buildings. Many people also feel uncomfortable with toilets with automated doors. On the plus side they are available 24/7 (unless vandalised or broken) and arguably are less likely to be a source of Covid infection, but on balance using existing buildings seems to be the better option.

Defecation in parks

Surprising as it may be to some, defecation (pooing) in parks is not unusual. During the lockdown of 2020, when park toilets were mostly closed, there was a marked increase in this. The locations are usually hidden away in bushes or undergrowth or in quiet areas of the park.

Apart from the smell and inherent disgust that it generates in others, human faeces are a vector for parasites and bacteria that can cause anything from diarrhoea and vomiting (norovirus) to severe conditions such as hepatitis A and parasitic gut infections such as threadworms or *cyclospora*.

There is also the matter of human decency and respect of others. Defecating in parks shows neither of these qualities and risks a park user having an unpleasant - -and potentially unhealthy – encounter.

Those defecating in parks include rough sleepers in parks and park users who are 'caught short' or who cannot be bothered to go elsewhere. There is some evidence to suggest that passers-by, delivery drivers etc use green space near roads for this purpose.

Use of cocaine and cocaine derivatives is associated with an urgent need to defecate (though opiates, like heroin, tend to cause constipation)

and the frequent presence of drug paraphernalia near human faeces in parks indicates that this is a cause.

The rather shocking photograph below shows an enclosed area in bushes in a Haringey park that was used as a toilet by a rough sleeper.



As suggested earlier, park users who are neither sleeping rough nor using drugs defecated in parks last summer because toilets were closed or queues were too long.

None of this is an excuse and the parks service will take action against anyone found defecating in Haringey parks.

Urination in parks

It is unhygienic to urinate in parks, especially if the same spot is regularly used, and there are issues of public decency associated with public urination as well as the strong smell from sites that are frequently used. Parks users, if asked, do not want their parks used as a toilet.

Urination in parks (and other public places) can be an offence but there is not a law against urination in public. The Public Order Act, 1986 can be enforced, enabling a fine to be levied. Other legislation could be used depending on the circumstances (such as public decency or exposure).

However, the Parks Service acknowledges that some people have medical conditions that may cause them to need to urinate urgently or frequently, and small children often leave it too late to make a visit to a public toilet. In such circumstances judgement will be used by parks or enforcement officers, but public decency must be respected at all times.

Legal position

There is no current byelaw that explicitly covers defecation or urination in parks or public spaces. However, Haringey byelaw 12 states that: "No person shall in any street or public place to the annoyance of residents or passengers commit any nuisance contrary to public decency or propriety".

	<p>There is a case for seeking a borough-wide Public Spaces Protection Order for all Haringey parks including specific reference to defecation and urination. It could cover highways and other public spaces. Evidence of the scale of the problem and the likelihood of it being an ongoing problem would need to be provided to secure a PSPO.</p> <p>Although they are last-resort powers, it is also open to the Council to adopt (with the consent of the Secretary of State) byelaws specifically addressing the issue.</p>
<p>Penalties and enforcement</p>	<p>Taking enforcement action against urination and defaecation in parks is difficult unless someone is caught 'in the act' by a police officer or an authorised officer of the council.</p> <p>PSPOs – if adopted - are enforceable by prosecution, with a maximum fine on scale 3; a Fixed Penalty notice of £100 can be issued allowing an offender the opportunity to avoid prosecution.</p> <p>Byelaws are publishable by a fine on scale 2; and, again, an Fixed Penalty Notice can be issued.</p>
<p>References</p>	<p>Best Practice Advice, British Toilet Association, 2010 Changing Places web site (and links) www.changing-places.org Impact of toilet closures during lockdown, The Guardian, June 2020.</p>

Name	Permitted activities for commercial gain in parks and greenspaces
Policy ref no.	PGSS15
Date adopted	TBA (March 2023)
Next review	Every three years
Next scheduled review date	March 2026
Policy	To ensure that commercial activities that take place in the borough's parks are 'permitted' within a transparent framework that ensures that these activities contribute financially to the parks service and that that safety and comfort of park and greenspace visitors is properly considered when assessing applications for Permitted Activities.
Context	<p><u>Introduction</u></p> <p>Haringey's parks and greenspaces are for the enjoyment of all residents and those who work within the borough. There are a diverse range of leisure and sport activities that take place within these spaces. These activities are generally free and include formal and informal sport, walking, dog walking, enjoying nature, picnicking, meeting friends and family, play and relaxing.</p> <p>In more recent times Haringey's parks and greenspaces have also been utilised by individuals and organisations for commercial gain. These activities include (but are not necessarily confined to):</p> <ul style="list-style-type: none"> • Personal training of groups or individuals • Group exercise classes • Dog walking • Forest Schools • Specific training for sport e.g., tennis coaching, football academies <p><u>Background</u></p> <p>Haringey wants parks and greenspaces that are well used by all sections of the community, particularly the most disadvantaged. This is because, all our residents and particularly disadvantaged residents, will gain health and social benefits that accrue from visiting a park.</p> <p>Parks and greenspaces cost a considerable amount to be welcoming, safe and attractive. We also know that to widen participation and attract the most disadvantaged residents to enjoy the benefits of visiting parks; a budget is required to carry out the engagement work with these residents, that is vital to ensure they get the maximum benefit from this universal free service.</p> <p>The overall Parks and Greenspaces budget is primarily focussed on ensuring that our portfolio is safe and welcoming. Therefore, other funding needs to be generated for engagement activity. One of the tenets of the developing Parks and Greenspaces Fees and Charges Policy is that those using Haringey parks and greenspaces for commercial gain should pay a fee. Furthermore, to ensure that this activity is carried out safely and that the Council is not put at risk there must be a due diligence process undertaken for these commercial activities.</p>

Fees generated from charging those engaged in commercial activities in the borough's parks and greenspaces (and other fees generated from sports park hire etc) can be utilised to provide for engagement activity and in some cases improve maintenance regimes on sports courts and pitches.

Haringey has had a price list for 'Park Based Organised Exercise / personal training'. The fees are graduated dependent on the numbers attending the sessions over the course of a year.

Benchmarking and Pricing

Around 50% of London boroughs charge fees for commercial activity such as personal training. While all the boroughs that charge for these activities, structure their pricing slightly differently, overall Haringey's price list is generally in line with what other boroughs charge:

It is proposed, with some minimal tweaking, that the price list (see Appendix C) is also used for other commercial activities carried out in parks – except for Forest Schools.

Forest Schools are charged on a percentage basis related to the fees that the schools charge the students for attending. This was set at 7.5% of the overall child rate charged by the schools in the 2021-22. Prices will rise to 10% of the child rate in 2022-23. Environmental Activities are charged per session 7.5% of the per day child rate charged by the schools in the 2021-22. Prices will rise to 10% of the per day child rate in 2022-23.

Activities, Qualifications, and other Due Diligence

Park based organised exercise/Personal Training: This activity is carried out by companies or individuals in any part of a park that is suitable. Generally, the training is on a 1 to 1 basis but there is also group training (Group Exercise/Circuit Training outdoors).

Those carrying out this activity must have the following and make it available to the Parks and Leisure Team for scrutiny and filing so that a 'Permit' can be issued to the individual/organisation:

- Suitable British Personal Training Qualification or British Group Exercise Qualification depending on the activity undertaken
- Valid and comprehensive first aid training certificate e.g. First Aid at Work adapted for Sports
- Public Liability Insurance - £5M
- Employer Liability Insurance - £5M (if employing staff or utilising volunteers)
- DBS – issued in the last 3 years (number and date of issue required)
- Permit Application Form completed
- Customer SAP form (the Council's Finance System) completed
- Method Statement/s and Risk Assessment/s completed

Dog Walking: This activity is carried out by companies or individuals who use Haringey parks to walk dogs, other than their own, for commercial gain. A Dog Walker with a Permit from the Council may walk up to 6 dogs at a time. The Permitted Dog Walker must comply with all relevant aspects of the Dogs and Control of Dogs: Parks and Greenspaces Policy (PGSS4).

Those carrying out this activity must have the following and make it available to the Parks and Leisure Team for scrutiny so that a 'Permit' can be issued to the individual/organisation:

- Public Liability Insurance - £5M
- Employer Liability Insurance - £5M (if employing staff or utilising volunteers)
- Risk Assessment and Method Statement related to the activity location/s
- Customer SAP form (the Council's Finance System) completed
- Method Statement/s and Risk Assessment/s completed
-

Forest Schools and Environment Sessions: This activity is carried out by private and Haringey schools. Where a school charges a fee for overall school attendance or for an environmental session then as detailed above, charges will be applied on a percentage basis.

With this category, of more importance than payment, is ensuring the school groups are treating the borough's ancient woodlands and other areas of Special Scientific Interest with due care. Thus, it is important that all schools wishing to undertake this activity on a regular or one-off basis, contact the Parks and Leisure Service for a 'Permit' which will outline the rules of use and good practice. Furthermore, such is the delicate state of some of these areas the system of contacting the Department will ensure that sensitive areas are not overwhelmed with visitors and that visits are rationed as appropriate. Where possible schools will be directed to less environmentally sensitive areas within our portfolio to conduct these activities.

In terms of due diligence Haringey schools will be required to submit the following to the Parks Team for scrutiny and filing so that a 'Permit' and the 'Forest School Code of Practise' can be issued to the school:

- Name and contact details including mobile phone number of the staff member in charge of the group
- Numbers and age group of the students
- Risk Assessment and Lesson Plan related to the activity completed
- Permit Application Form completed
- Customer SAP form (the Council's Finance System) completed

For private fee charging schools the above information is required as well as:

- Public Liability Insurance - £10M
- Employer Liability Insurance - £10M
- OFSTED registration details

Sports Specific Training and Other Commercial Activity

Generally, the system detailed under 'Park based organised exercise/Personal Training' applies to this group. Exceptions are pitch based team sports who should refer to the 'Terms & Conditions of Pitch and Other Park Sports Facility Hire' and the 'Parks Pitch and Sports Facility Prices.'

General Conditions

Personal Trainers, Dog Walkers and similar providers should wear a tabard (or other highly visible clothing) with the permit number visibly and clearly displayed. This enables other park users to see that they are permitted to be carrying out the activity and to be able to make a formal complaint if they have cause for concern about the behaviour.

If appropriate the Council may advertise those individuals and organisations permitted to deliver activities in the borough's parks and greenspaces.

The engagement with individuals and organisations utilising the parks and greenspaces for their business will also afford the Council the opportunity to monitor the delivery with reference to Safeguarding, health and safety, general behaviour standards and ensuring respect for the park environment. As well if it is considered for a range of reasons that too many permits are requested for particular activities in certain locations e.g., Forest Schools, then the Council can choose not to permit a business to be conducted on the borough's premises. Reasons to refuse or terminate a Permit include:

- Applicant does not pass the due diligence requirements
- Environmental concerns related to overcrowding in sensitive areas
- Overcrowding on facilities e.g., Outdoor Gyms
- Non-payment of fees
- Non-compliance with conditions of the permit

Permits must be renewed annually. Renewal applications can be made up to six weeks before the expiry date of the permit. Renewal applications will be considered within 40 days of receipt of the application.

Charities/Activities Delivered for Free/Low Cost

All organisations no matter how constituted must pay the appropriate fee to carry out commercial activities in Haringey's parks and greenspaces.

If activities are being delivered free, then subject to all the due diligence being satisfactory a Permit will be issued, and no payment taken for the period of free delivery.

If activities are being delivered at below market rates the appropriate deduction will be calculated to arrive at the relevant fee. Once this fee is agreed and the due diligence is satisfactory a Permit will be issued for the period of discounted delivery.

Communications

Individuals and organisations issued permits may advertise their activities via social media. For physical advertising at park locations (banners, leaflets,

	<p>posters etc) specific permission must be sought and generally an additional fee paid.</p> <p>The Council may choose to advertise those with Permits and the activity their Permit is valid for; to demonstrate to the public that those with Permits have passed due diligence requirements</p> <p>From time to time the officer responsible for issuing Permits will send a list of Permit Holders to all other relevant Parks and Leisure staff.</p>
Legal framework	<p>The Council has the power under the Public Health Act 1925 to charge for use of the park/open space to and there is an existing pricing schedule.</p> <p>The Council also has a duty under various Acts of Parliament to ensure that any business carried out on Council land is compliant in terms of safeguarding, possession of public liability insurance, and in addition complies with the byelaws and policies the Council has in place and as determined from time to time. Where any business involves unsupervised contact with vulnerable adults or children an up-to-date Disclosure and Barring (DBS) certificate is required.</p>
Penalties and enforcement	<p>Parks and Leisure staff as part of their normal duties will approach those conducting activity to check if they have a Permit. If no Permit is produced the individual will be asked to stop conducting their business on Council property.</p> <p>Ideally the staff member will also give the 'Parks Commercial Activity – Initial Contact Letter' (Appendix E) to the individual.</p> <p>At key times, e.g., spring/early summer; staff will carry out specific 'sweeps' of the main parks to check Permits and to engage those without Permits.</p> <p>If an individual or organisation repeatedly refuses to either stop their commercial activity or refuses seek a Permit the Council will consider taking that individual or organisation to court.</p> <p>If it is considered that commercial activity without a Permit is becoming endemic in a particular park the Council may consider a programme of continuous checks to disrupt the activity allied with publicity warning the public against being trained by people without the Council checking their credentials.</p>
Appendices	<p>The detail of these is to be developed:</p> <p>Appendix A: Permit Application Form Appendix B: Customer form for SAP (the Council's Finance system) Appendix C: Summary Parks Fees & Charges Appendix D: Terms and Conditions for Personal Training and Park Based Exercise Appendix E: Forest School and Environmental Activities Code of Practise for Schools Appendix F: Parks Commercial Activity – Initial Contact Letter</p>

Name	Graffiti, flyposting, advertising and banners in parks and greenspaces
Policy ref no.	PGSS16
Date adopted	TBA
Policy	<ul style="list-style-type: none"> • Graffiti is not permitted on any surface in parks and greenspaces • Art graffiti may be tolerated in those locations identified in Annex 1 to this policy document. • Graffiti in parks and greenspaces will be removed within 5 days of being reported; offensive and racist graffiti will be removed within 24 hours of being reported • Fly posting is not permitted in any park or greenspace. • Fly posted notices and signs in parks and greenspaces will be removed within 5 days of being reported; offensive and racist fly posters and notices will be removed within 24 hours of being reported • Banners and publicity material by third parties may only be put up in parks and greenspaces with the written permission of the Parks Events Team. A fee may be charged. • Action may be taken against those that put up notices, banners and signs in parks and greenspaces without the permission of the council.
Context	<p><u>Graffiti</u></p> <p>Graffiti comes in many forms but is generally unwanted marks on physical assets in public places. The marks are often, but not necessarily, made with a permanent or semi-permanent material such paint.</p> <p>Some graffiti is valued for its artistic, creative and/or other qualities. Most famously street art graffiti by Banksy would fall into this category.</p> <p>However, most graffiti in Haringey's parks and greenspaces is unwanted, unauthorised and unattractive. Most commonly it is in the form of 'tagging' - initials, symbols or names of the perpetrator.</p> <p>In some parks and greenspaces graffiti has occurred over many years, such as by the BMX/skate area in the NE corner of Markfield Park where it becomes a feature of the urban environment. This does not mean it is permitted, but it may be tolerated in some places.</p> <p>Graffiti that is obscene, offensive or racist is always unacceptable and will be prioritised for removal. It is the council's target to remove such graffiti within 24 hours of being reported.</p> <p>In order to deter further graffiti criminal action may be taken against those who are caught putting graffiti in parks and greenspaces.</p>

	<p><u>Fly posting, banners and advertising</u></p> <p>Putting up posters, signs, banners or messages in or on the boundary of parks and greenspaces is not permitted unless agreed in advance with the parks service.</p> <p>As well as keeping the park free of visual clutter and confused messaging it is to ensure that unlawful, racist, offensive, political and other unwanted messaging is not present in parks.</p> <p>Such notices may be taken down or removed immediately.</p> <p>Banners may be put up in parks with the agreement of the parks service. A fee may be charged to do so.</p> <p>Park noticeboards may only be used by the parks service and the relevant friends of parks group.</p> <p>Enforcement action may be taken against those who persistently or wilfully put up banners, signs or fly post in parks or on park boundaries.</p>
Legal framework	Anti-Social Behaviour Act, 2003 Town and Country Planning Act, 1990
Penalties and enforcement	

Name	Enforcement in parks and greenspaces
Policy ref no.	PGSS17
Date adopted	TBC (March 2023)
Review frequency	Every three years (aligned with Public Spaces Protection Orders renewal cycle)
Next scheduled review date	January 2023
Policy position	<ul style="list-style-type: none"> • The Council will seek the compliance with park policies through the engagement, education and encouragement of park users. • If engagement, education and encouragement is not effective the council may take enforcement action to secure compliance. • Authorised enforcement officers will have a presence in parks and greenspaces across the borough to engage, educate, encourage and if necessary, and where lawful, to enforce compliance with park (and Council) policies. • A police response will be sought where an unlawful activity or behaviour occurs in a park or greenspace that is not within the powers of Council officers to act. • Enforcement action will only be taken where the powers to enforce are present in the form of legislation, byelaws or public spaces protection orders (PSPOs). • Where necessary the Council will seek further powers in the form of additional byelaws or PSPOs.
Definitions	<p>Public Spaces Protection Order (PSPO) – is a legal Order that gives a local authority powers “to tackle activities carried on in a public place which have a detrimental effect on the quality of life of those in its locality”. PSPOs were first introduced in the Anti-Social Behaviour, Crime and Police Act 2014. They are for a maximum period of three years, but may be renewed for a further three year period.</p> <p>Byelaw – a local law applying within some or all of the local authority area. Any new byelaw requires the personal authorisation of the Secretary of State for Housing, Communities and Local Government</p> <p>Fixed Penalty Notice (FPN) - An FPN is in effect a fine that must be paid within a fixed period. Failure to pay the FPN can result in criminal prosecution.</p>
Context	<p>The council has policies relating to parks and greenspaces. While some are concerned with how the council manages and maintains parks, many deal with those activities and behaviour that is not permitted in parks and greenspaces. These include things such as littering, lighting fires or camping.</p> <p>Where a particular behaviour is not permitted it is necessary to set out what action – including enforcement action – may be taken if, and when, such behaviour occurs. These can loosely be described as the four E’s – engagement, education, encouragement and enforcement.</p> <p>Engagement is simply about talking to the person. It can be followed up with education to explain why the behaviour is not permitted.</p> <p>Encouragement is used to try to achieve a change in that behaviour.</p>

Finally **enforcement** is the last resort which can take form of a penalty such as a fine or potentially a criminal conviction.

Education and encouragement is often communicated to park users through signage and notices such “Do not feed the ducks” or “No cycling”. Sometimes there will be an explanation to encourage behaviour change.

This policy document is primarily concerned with **enforcement** of the policies, laws, byelaws and public spaces protection orders (PSPOs) that apply in council parks and greenspaces.

Breaches of laws that apply anywhere (but which may occur in parks), such as drug dealing or robbery, are not included. These are a police matter and should be reported to the police by calling 101 or, in an emergency, 999.

Who can take enforcement action in parks and greenspaces?

Enforcement action may only be taken where a law, a byelaw or a public spaces protection order (PSPO) explicitly says the behaviour is unlawful or not permitted in that location.

Whilst any employee of the parks service can seek to engage, educate and encourage people in parks and greenspaces to change their behaviour (such as to pick up a piece of discarded litter), they do not have the power in law to issue fines or take other enforcement action.

The parks service is keen to establish a permanent, trained and authorised staffing resource to take enforcement action in parks and greenspaces.

At present the council has an anti-social behaviour (ASB) enforcement team. Council ASB enforcement officers have the power in law to issue fixed penalty notices (FPNs) and in some cases confiscate or remove items (such as alcohol) from people in breach of laws, byelaws or PSPOs. However, their responsibilities are for the whole borough, and not just parks and open spaces, and inevitably they are more often than not engaged in dealing with enforcement issues elsewhere in the borough.

Other council enforcement officers – such as the civil enforcement officers who are usually seen dealing with traffic and parking violations – have the same powers as the ASB enforcement officers. Again, their role is directed towards road traffic issues.

Police officers and police community support officers also have powers, which they may exercise in parks and greenspaces. Police officers also have the power to arrest people who are in breach of laws, byelaws or PSPOs in parks and greenspaces.

	Appendix 1 sets out how those policies relating to the behaviour of people in parks and greenspaces may be enforced.
Legal position	Enforcement action may only be taken where a law, a byelaw or a public spaces protection order (PSPO) explicitly says the behaviour is unlawful or not permitted in that location.
Penalties and enforcement	See Appendix 1
References	PSPOs: Guidance for Councils , Local Government Association

Appendix 1: Enforcement action that may be taken in parks and greenspaces

Policy	Ref	Basis for enforcement	Penalty	Ease of enforcem't	Priority for action	Who to act/enforce	Notes
BBQs in parks	PGSS 1	Encouragement	None	varied	High	???	Target bigger parks on sunny weekends. Needs PSPO
Fires in parks	PGSS 1	Encouragement	None	Difficult	High	???	Often after dark. Needs PSPO
Release of sky lanterns	PGSS 1	Encouragement	None	Difficult	Low	???	After dark so difficult
Discharge of fireworks	PGSS 1	Fireworks Act 2003	FPN £90 to six months prison	Difficult	Low	Police?	After dark so difficult
Alcohol-related ASB in parks in Alcohol Control Zone	PGSS 2	PSPO	Confiscation/FPN	Medium	High	Police and authorised council enforcement officers	Only where current PSPO applies
Alcohol-related ASB in parks <u>not</u> located in Alcohol Control Zone	PGSS 2	Criminal Justice act 1967, s90.	FPN	Medium	High	Police only	Where PSPO does not apply, law for drunken behaviour in a public place can be applied
Not disposing of alcohol containers – littering	PGSS 2	EPA, 1990	FPN	Medium	Medium	Police and authorised council enforcement officers	
Consumption of alcohol in playgrounds, MUGAs etc	PGSS 2	Varies	None	Difficult	Medium	Parks staff	Depends if a PSPO is in place.
Sale of alcohol by park cafe	PGSS 2	Licensing law	???	Easy	Low	Licensing	This has not been an issue in parks
Consumption of alcohol brought to the park, in cafes or on outdoor café tables	PGSS 2	Persuasion	None?	Medium	Low	Café leaseholder	Café owner should deal with this. Possible licensing issue

Policy	Ref	Basis for enforcement	Penalty	Ease of enforcement	Priority for action	Who to act/enforce	Notes
Sale of alcohol at unlicensed and/or unauthorised events in parks	PGSS 2	Licensing law	???	Medium	High	Licensing or police?	This does happen but such events tend to be after dark.
Smoking in enclosed buildings	PGSS 3	Health Act 2006		Medium	Medium	Police?	Although covered by law encouragement should be used if this occurs.
Vaping in enclosed buildings	PGSS 3	Encouragement	None	None	Medium	Parks staff	Encouragement should be used if this occurs.
Smoking or vaping within 10m of buildings	PGSS 3	Encouragement	None	None	Low	Parks staff	Encouragement should be used if this occurs.
Smoking or vaping in playgrounds	PGSS 3	Encouragement	None	None	Low	Parks staff	Encouragement should be used if this occurs.
Smoking of cannabis in parks	PGSS 3	Issue of Drugs Act 1971	FPN for possession	Medium	Low	Police	Police can issue a warning or an on-the-spot fine if you're found with cannabis.
Consideration of others when smoking in parks	PGSS 3	Encouragement	None	None	Medium	Parks staff	Encouragement to desist should be used if this occurs.
Smoking or vaping within council vehicles	PGSS 3	Health Act 2006; terms and conditions of employment	Management action	Easy	Medium	Parks management	Agency staff should be warned and may have contract terminated
Smoking or vaping by parks staff or contractors while working	PGSS 3	conditions of employment	Management action	Easy	Low	Parks management	How are breaks treated?
Dogs must be under control	PGSS 4	PSPO (Dog control)	FPN	Easy	Medium	Police and authorised council enforcement officers	This might apply to adults and children over 10 who are not physically able to control their dog
Dogs must not be supervised by anyone under 10	PGSS 4	Encouragement	None	Easy	High	Parks staff	The age of criminal responsibility is 10. For anyone

Policy	Ref	Basis for enforcement	Penalty	Ease of enforcement	Priority for action	Who to act/enforce	Notes
							under 10 the responsible adult must be identified or contacted.
All dogs in parks to be microchipped and/or wear a name tag	PGSS 4	Microchipping of Dogs regulations, 2015	Fine (up to £500)	Difficult	Low	Enforcement	Legislation says it is not for the police to enforce this law
All dogs in parks to wear a collar	PGSS 4	Control of Dogs Order 1992 (Animal Health Act 1981)		Easy	Medium	Enforcement	
Dog fouling	PGSS 4	PSPO (Dog control)	FPN	Easy	Medium	Police and authorised council enforcement officers	
Dogs on a lead in parks and greenspaces under 0.5 hectare,	PGSS 4	PSPO (Dog control)	FPN	Easy	Medium	Police and authorised council enforcement officers	
Dogs on a lead by direction	PGSS 4	PSPO (Dog control)	FPN	Easy	Medium	Police and authorised council enforcement officers	
Number of dogs walked by a single person	PGSS 4	Permitted activities policy; PSPO (Dog control)	FPN	Easy	Medium	Police and authorised council enforcement officers	Current PSPO is for walking up to six dogs. The permitted activities policy requires a permit for anyone walking

Policy	Ref	Basis for enforcement	Penalty	Ease of enforcement	Priority for action	Who to act/enforce	Notes
							more than four dogs (but no more than six)
Dogs in dog exclusion areas	PGSS 4	PSPO (Dog control)	FPN	Easy	Medium	Police and authorised council enforcement officers	
Dogs damaging trees or assets in parks	PGSS 4	PSPO (Dog control)	FPN			Police and authorised council enforcement officers	This is covered by the dogs under control element of the dog control PSPO.
Access via gates and gaps in boundary fences	PGSS 5	Trespass	Civil action	Medium	Varies	Enforcement Team	Enforcement priority given to local nature reserves and ancient woodlands. Access can be blocked on the 'park side' of the boundary.
Unauthorised encroachment by individuals	PGSS 5	Trespass	Civil action	Hard	Low	Parks staff or enforcement team	Parks staff to advise the individual if seen but to refer repeated or reluctant transgressors to the Enforcement team
Vehicle gates left open by staff	PGSS 5	Encouragement	Disciplinary action (see notes)	Easy	Low	Parks management	Disciplinary action is an option for managers if it is repeated behaviour
Vehicle gates left open by contractors	PGSS 5	Encouragement	None	Easy	Low	Client for the contract	Ultimate sanction is to not award future work
Vehicle gates left open by leaseholders	PGSS 5	Encouragement	None	Easy	Low	Park Projects Officer (PPO)	Ultimate sanction is to ask for the keys or to change the locks

Policy	Ref	Basis for enforcement	Penalty	Ease of enforcement	Priority for action	Who to act/enforce	Notes
Vehicle gates left open by events staff or management	PGSS 5	Encouragement	None	Easy	Low	Events manager	Ultimate sanction is to not award future work.
Enforcement or criminal action will be taken against anyone deliberately introducing INNS to Haringey parks and greenspaces	PGSS 5	The Wildlife and Countryside Act 1981	Up to £5,000 fine or up to two years in prison	Hard	High	NCO/PPO to instruct Legal or report to police	Nature Conservation Officer (NCO) / Nature Conservation Manager would need to support or request enforcement action
Habitat degradation	PGSS 1 PGSS 5 PGSS 11	Various (see notes)	Various	Hard	High	Depends (NCO, PPO or Enforcement Team)	This covers degradation of local nature reserves or SINCS (e.g. by having fires, fly tipping, cycling on protected areas etc)
Maximum speed of authorised vehicles in parks	PGSS 10	Contracts with staff, contractors etc	None?	Easy	Low	Parks management (staff or contractors speeding); others???	Requires PSPO or byelaw in all parks except Finsbury where an old GLC byelaw is in place.
Unauthorised powered vehicles in parks and greenspaces (inc motorcycles)	PGSS 10		None?	Easy	Medium	???	Requires PSPO or byelaw.
Caravans and camper vans in parks and greenspaces	PGSS 10		None?	Easy	High	???	Requires PSPO or byelaw.
Use of hazard lights by authorised vehicles	PGSS 10	Encouragement		Easy	Low	Parks staff	Requires PSPO or byelaw.
Not driving on grass	PGSS 10	Encouragement	None?	Easy	High	Parks staff	Requires PSPO or byelaw.
Turning engines off while stationary	PGSS 10	Encouragement	None?	Easy	Low	Parks staff	Requires PSPO or byelaw.

Policy	Ref	Basis for enforcement	Penalty	Ease of enforcem't	Priority for action	Who to act/enforce	Notes
Parking in marked bays only	PGSS 10	Parking enforcement arrangements	FPN	Easy	Low	Parking enforcement contractor	Parking regulations (where applicable)
Cycling in prohibited places	PGSS 10	Encouragement LBH Byelaw 24	FPN	Medium	Medium	Authorised council enforcement officers	Bye laws say no cycling on footpaths where notices say it is prohibited
Cycling over 10mph	PGSS 10	Encouragement	None	Easy	Medium	???	Requires PSPO or byelaw.
Cyclists with lights/visible when dark	PGSS 10	Encouragement	None?	Easy	Low	Parks staff	Not appropriate to enforce
Leave hire cycles outside parks	PGSS 10	Encouragement	None?	Medium	Low	Parks staff	Not appropriate to enforce
Use of personal powered transport devices in parks (e.g. e-scooters)	PGSS 10		Fine	Medium	Low	???	Requires PSPO or byelaw.
To take action against those who drop litter in parks	PGSS 11	Environment Protection Act 1990, s.87	FPN	Medium	High	Authorised council enforcement officer	Best achieved by targeted action at pre-determined times and places
To take action against those who fly tip in parks	PGSS 11	Environment Protection Act 1990	Unlimited fine; imprisonment	Difficult	High	Authorised council enforcement officer	Use of CCTV in hotspots to collect evidence
Amplified music or speech	PGSS 12	Environment Protection Act 1990 and byelaws	FPN	Easy	High	Authorised council enforcement officer	Encouragement should be used before considering enforcement action.
Unlicensed music events	PGSS 12	Environment Protection Act	FPN	Easy	High	Police and authorised council	These often take place late at night

Policy	Ref	Basis for enforcement	Penalty	Ease of enforcem't	Priority for action	Who to act/enforce	Notes
		1990 and byelaws				enforcement officers	
Other loud or continuous anti-social noise	PGSS 12	Environment Protection Act 1990 and byelaws	???	Easy	High	Authorised council enforcement officer	Encouragement should be used before considering enforcement action
Tents may not be pitched for overnight use	PGSS 13			Varies	High	Police and authorised council enforcement officers	Requires PSPO or byelaw. Encouragement should be used before considering enforcement action. Refusal to take down and remove a tent could constitute fly tipping
Smoking, drinking, drug use, sexual activity and other anti-social behaviour in park toilets.	PGSS 14	Various		Difficult	High	Police and authorised council enforcement officers	Requires PSPO or byelaw. The basis for enforcement depends on the activity. Most park toilets are within cafes and should be managed by the leaseholder;
Defaecation in parks and greenspaces	PGSS 14	Byelaw 12	FPN	Difficult	High	Police and authorised council enforcement officers	There is a case for a PSPO on defaecation in parks and greenspaces. The current Byelaw 12 says "No person shall in any street or public place to the annoyance of residents or passengers commit any nuisance contrary to public decency or propriety".
Urination in parks and greenspaces	PGSS 14	Encouragement	FPN	Difficult	High	Police and authorised council	There is a case for a PSPO or byelaw on defaecation in parks and greenspaces.

Policy	Ref	Basis for enforcement	Penalty	Ease of enforcem't	Priority for action	Who to act/enforce	Notes
						enforcement officers	Encouragement should be used before considering enforcement action.
Graffiti	PGSS 16	ASB Act 2003	FPN	Difficult	Medium	Police and authorised council enforcement officers	
Flyposting	PGSS 16	Town and Country Planning Act 1990	FPN	Difficult	Medium	Police and authorised council enforcement officers	

