Dear Minister,

Consultation on Local Authority Parking Enforcement

The British Parking Association has considerable concerns with the content of the Government’s consultation.

I enclose a full response to the consultation together with an executive summary, but I think there are some substantial issues which the Government must consider and address which are set out below:

- There is no regulatory impact assessment on these proposals. There can be no doubt that there are very significant impacts on road users (particularly disabled people and children), on local authorities and on businesses, and the Association is very disappointed that no attempt has been made to quantify these impacts. In particular, there is no equality impact assessment.

- The Association cannot see how the Government can introduce any of these measures without primary legislation. Proposals to ban CCTV and to change the basis upon which penalty charge notices are paid will require primary legislation. We do not see how the Government can undermine the will of Parliament, which introduced these changes in base road traffic and traffic management legislation. Both these items will open the government to potential Judicial Review of its decision should it proceed without addressing these items.

- The Consultation is derived from the Department for Communities and Local Government's objective of revitalising the high street. This is a laudable objective and one which our local authority members have always taken very seriously, but traffic and parking management is also about tackling congestion, improving road safety and encouraging more sustainable forms of transport. The Government’s own report indicates that traffic will increase by 43% by 2040. As all local authorities have a network management duty under the Traffic Management Act, how can they be expected to address this forecast increase in traffic, and its consequent impacts on town centres through increased congestion, if some of the tools available to them are to be outlawed?

- The Consultation appears to be based on concerns by a minority of road users who receive penalty charge notices. The Government should understand that a small minority of motorists receive penalty charge notices – most research indicates around 20%. The vast majority (the silent majority) benefit from the activities undertaken by local authorities to address the small minority who park in contravention of parking controls. That is not to say that that minority should not be treated fairly but we do believe that the Government should be proportionate in its response to this minority.
• The Government appears to have derived its consultation from comments by some Ministers about how local authorities are using parking enforcement as a “cash cow”. However, DCLG’s own statistics, which in turn have been analysed by the RAC Foundation, clearly show that not only have penalty charge notices declined in number over the last four years (by over 20% in London alone), but total income from parking has declined in real terms over that period. DCLG figures also show that local authority costs have declined during this period as they seek to be more efficient and provide a better value for money service to their residents.

• An underlying theme of the Consultation is that new technology somehow is a threat to motorists. On the contrary, new technology has significantly improved the offer to motorists, best illustrated by the use of mobile phone parking which enables motorists to be alerted to time expiry and remote topping up of time. In many other areas of Government activity new technology is being embraced positively (like the Cabinet Office’s “Digital by Default” programme) – why is this not the case with parking management?

In almost every area referred to in the Consultation there is the risk of serious unintended consequences. Our members have said to us that the Government should “be careful what they wish for”. Whilst the comments made in our Consultation response are clear, we do urge the Government to undertake a full impact assessment of any proposal to ensure that what they seek to achieve does not have unintended consequences.

As always we are happy to work with government to achieve a mutually constructive way forward.

Yours sincerely

Patrick Troy
Chief Executive
Executive Summary

Q1. Do you consider local authority parking enforcement is being applied fairly and reasonably in your area?

- The BPA believes that parking enforcement is in the main being applied fairly and reasonably throughout the UK.

- Constant criticism from government and the media is neither constructive nor helpful in promoting a rational debate which is why we have arranged a Parking Summit on 27 February 2014.

Q2. The Government intends to abolish the use of CCTV cameras for parking enforcement. Do you have any views or comments on this proposal?

- We are strongly opposed to this proposal. CCTV and ANPR cameras are vital tools to help improve road safety and especially so for enforcement outside schools, bus stops and other locations where there are road hazards.

- Banning the use of cameras for parking enforcement outside schools will put children’s lives at stake!

Q3. Do you think the traffic adjudicators should have wider powers to allow appeals?

- No, we do not feel that this is necessary; Parking and Traffic Adjudicators have wide ranging powers already.

Q4. Do you agree that guidance should be updated to make clear in what circumstances adjudicators may award costs? If so, what should those circumstances be?

- It may be appropriate for statutory guidance to make it clearer when awarding costs might be relevant. Adjudicators always have the discretion to award costs.

Q5. Do you think motorists who lose an appeal at a parking tribunal should be offered a 25% discount for prompt payment?

- No, we do not agree; it completely misunderstands and undermines the purpose of the penalty charge in the first place.

- Is the government really advocating a 25% discount on the statutory parking penalty charge for parking illegally and losing an appeal?
Q6. Do you think local residents and firms should be able to require councils to review yellow lines, parking provision, charges etc in their area? If so, what should the reviews cover and what should be the threshold for triggering a review?

- There are no parking controls in place that have not been sanctioned and approved by locally elected politicians. Locally elected politicians already have the powers to decide when and where parking controls are deployed and how they are enforced.

Q7. Do you think that authorities should be required by regulation to allow a grace period at the end of paid for parking?

- The majority of local authorities already allow a grace period within their parking enforcement; therefore there is no need to regulate it. Typically grace periods vary according to the circumstances. It would be wrong to mandate something which is best determined locally.

Q8. Do you think that a grace period should be offered more widely – for example a grace period for overstaying in free parking bays, at the start of pay and display parking and paid for parking bays, and in areas where there are parking restrictions (such as loading restrictions, or single yellow lines)?

- We agree, in principle, grace periods could be offered in ALL permitted parking bays: many local authority parking policies offer this already. There is no need to regulate it. The prospect of introducing grace periods for prohibited parking is unworkable; if there is room for people to park without causing a danger or obstruction to others then prohibited parking should be converted to permitted parking.

Q9. If allowed, how long do you think the grace period should be?

- Mandatory grace periods become the expected norm and give rise to further claims of unfairness if the grace period is exceeded by short periods.

Q10. Do you think the Government should be considering any further measures to tackle genuinely anti-social parking or driving? If so, what?

There are a number of objectives in the BPA Master Plan for Parking 2013/14 which support and underpin the objective to tackle genuinely anti-social parking or driving. Some of them are listed below and further details are set out towards the end of this response and in our Master Plan published at www.britishparking.co.uk.
• Everyone should know the rules and how to park compliantly

• Proper and effective parking and traffic management is essential to support sustainable growth in our high streets.

• Every parking and traffic Order should be easy to understand and simple to implement.

• No one should be able to avoid legitimate enforcement action by driving unregistered or untraceable vehicles.

• Everyone should respect parking concessions for people with disabilities, which should be more effectively managed.

• Parking on footways causes obstruction and damage and should be properly managed.

• Every Penalty Charge Notice should look the same

Impact on Business and Investment

Our covering letter sets out some fundamental concerns which we have in regard to this consultation, the government’s proposals and the scope of legislative powers to achieve them. In addition we have a serious concern about the impact the uncertainty that this consultation gives to the future of civil parking enforcement in particular and parking management in general. This uncertainty gives rise to significant concern in the business community and both our members and others advise us that it is becoming impossible for them to plan investment and plan for growth in manufacturing and innovation. If the government is serious about supporting business innovation and growth it will remove the very significant uncertainty and ambiguity which exists in a sector which employs 80,000 people in the UK.
Consultation Questions

Q1. Do you consider local authority parking enforcement is being applied fairly and reasonably in your area?

The BPA believes that parking enforcement is in the main being applied fairly and reasonably throughout the UK. There is always room for improvement and innovation, and one of our key roles is to promote knowledge sharing and best practice. Constant criticism from government and the media is neither constructive nor helpful in promoting a rational debate, which is why we have arranged a Parking Summit on 27 February 2014.

In particular we are concerned about the assumptions behind the questions in the consultation. There is no evidence offered as to why there is a need to ask such questions, the presumption being that there is something inherently wrong with the current system which has not been backed up by any evidence. Indeed, it is the only consultation we can think of where, in certain sections, the government is actively seeking to make it easier for motorists to break the law.

We have received a consistent response to this question from many of our members stating that they also believe local authority parking enforcement is being applied fairly and reasonably in their area. Some of these responses have come directly from the authorities themselves, providing evidence of their successful parking enforcement, as well as others coming from private parking professionals and motorists. BPA Members are clear that parking management is about keeping our streets safe, free from obstruction caused by indiscriminately parked cars, improving road safety, keeping children safe when they come out of school, protecting spaces for residents or particular groups of users such as disabled people and enabling servicing and deliveries to take place in high streets that would become congested if parking wasn’t properly and effectively managed.

The government has encouraged local councils to take over parking enforcement from police freeing the latter to deal with more serious crime; it continues to do so and also encourages local councils to be more efficient and yet is surprised when local authority parking managers actually get on with the job. Effective parking enforcement benefits the majority of motorists and is needed because of a minority of selfish motorists.

Our members are working hard to implement processes to ensure parking enforcement is fair and reasonable for residents and motorists; see some of the following examples we received in our consultation responses:

- Harrogate Council, like many others, operates a ‘first offence’ policy for some contraventions (non display of P&D tickets, misplaced/expired blue badge, etc), giving the motorists the benefit of the doubt having made a genuine mistake. Even with this in place, they have an 82% payment rate.

- Public compliance in Cambridge has consistently been in the region of 75-80% for nearly ten years.

- Sandwell Council regularly consult with the community and local businesses through ‘town tasking teams’ when reviewing TROs.
• Brighton and Hove council conducted a citywide parking review in 2013, which found that 93% of residents felt that their resident parking scheme was enforced. Also, their numbers of PCNs have fallen from 168,000 annually in 2003/4 to 115,000 in 2012/3—which indicates that as compliance increases the level of enforcement activity declines.

• Across the whole of London this is also true where PCN issuance has dropped over 20% in the past four years.

**Q2. The Government intends to abolish the use of CCTV cameras for parking enforcement. Do you have any views or comments on this proposal?**

We are strongly opposed to this proposal. The perception that CCTV and ANPR enforcement is automatic is wrong; a Civil Enforcement Officer (CEO) reviews and decides whether to issue a penalty charge notice based on evidence acquired using CCTV and ANPR. It is the CEO’s observations that are the primary evidence produced to prove a contravention has taken place. No penalty charge notices are issued automatically.

There is a paradox in the Government’s proposal, in that the consultation document states in section 4.3 that:

> “Drivers are also concerned that they may receive a parking ticket in the post weeks later, giving them no opportunity to examine the parking location as it was at the time of the alleged contravention.”

However, this concern is equally valid for safety cameras, congestion charging and road tolling, where the Government is the single largest user of these techniques and proposes that they continue to be deployed and their use expanded.

**Outside schools**

CCTV and ANPR cameras are vital tools to help improve road safety and especially so for enforcement outside schools, bus stops and other locations where there are road hazards.

The use of CCTV and ANPR cameras outside schools is in place to ensure the safety of the local community. There is a further paradox in the consultation document where it states in 4.17 “Localism is not just about power to councils, it is about empowering local communities”. It is well known that CCTV and ANPR cameras are commonly deployed at the request of the local community and school children themselves who want to be protected from selfish and often dangerous parking by a tiny minority. Upon consulting with our membership on this point, an overwhelming majority of our responses confirmed that their local communities particularly appreciated and praised the use of CCTV cameras when themselves and their children’s safety was concerned.

Interestingly, in his recent response to Karen Lumley MP who tabled a question on legislative proposals to reduce congestion around primary schools, the Minister Robert Goodwill MP referred to the Network Management Duty in the Traffic Management Act 2004 and its role in managing congestion outside schools; that's exactly what most local authorities use ANPR and CCTV systems for. In recent
years there are examples where Government has funded through grants the delivery and implementation of such systems.

Banning the use of cameras for parking enforcement outside schools will put children’s lives at stake.

- A key example of this positive use of CCTV is Oldham Council; after an 11 year old school girl was nearly hit by a car outside her school in 2012, she began to lobby the council to provide more enforcement of restrictions outside schools. The council responded by enlisting the help of all the schools in Oldham to launch a competition to name the very first School Safety Vehicle; after over 700 entries were submitted, Oscar (Oldham Safety Car) began to enforce outside schools, reducing the number of injuries and raising awareness of the serious problems that obstructive parking and congestion are causing on a daily basis in reducing visibility for children crossing the road. (See Appendix A

- Southend Council publish a list of locations on their website that are covered by CCTV enforcement and the reasons why. Members of the public take this opportunity to request locations to be added to the list.

- Tunbridge Wells Borough Council introduced CCTV enforcement at the request of the schools in the area – upon introduction outside 17 schools, they’ve already seen the PCN levels drop to half what they were previously.

- The London Borough of Bromley won an award at the British Parking Awards 2013 for their ‘zig-zag study’, consulting with the school community and undertaking research and analysis as to how the community and the members of the public understand and feel towards the usage of school zig-zags. Photographs and a press clipping of this study can be seen in Appendix B, and a press release from the council can be seen here.

**New technology**

- **Safety of lone workers**

  CCTV in the form of body-worn video can be highly beneficial in the protection of CEOs and others involved in parking enforcement, such as bailiffs, whilst at work; their safety should be paramount.

- **Park Now, Pay Later**

  ANPR systems are increasingly being considered for replacing barrier controlled car parks, improving accessibility for people with disabilities and allowing motorists to pay for their parking after leaving the car park. This compares with London congestion charging, where the motorist has until midnight of the next charging day to pay, to avoid a penalty charge.

- **Contextual view**

  Typically representations and appeals against PCNs are half of those issued by foot patrols because the recipient is able to view the contravention both as a still photograph and, on application, by video. This helps PCN recipients decide whether the PCN was fair because it offers a contextual view of the
circumstances surrounding the contravention which cannot be available so easily with a traditionally-issued PCN.

- **Cost to business**

  Local authorities that have already invested in camera technology could see a significant financial impact by abandoning this method of enforcement. For example, each fully kitted-out CCTV car costs between £50k and £60k.

**The way forward**

Cameras (CCTV and ANPR) are useful tools to properly manage parking. Everyone should use CCTV and ANPR fairly and responsibly. We believe that Government should not ban them but should properly regulate their use for specific, locally-defined purposes.

In the Coalition Agreement, Government committed to ‘further regulation of CCTV’. It did not commit to ban CCTV. Instead, it appointed a Camera Surveillance Commissioner. The newly appointed Commissioner has produced a Code of Practice which could be used to provide proper and effective guidance about where and when CCTV and ANPR can be used for the management of parking. We believe Government should be clearer about where and when CCTV is used, rather than banning it for all circumstances. Motorists who park legally have nothing to fear regarding CCTV and ANPR; they are used for the good of the community.

CCTV & ANPR is particularly useful when managing so called ‘no stopping’ contraventions e.g. those situations like Bus Stops, School Keep Clear and Bus Lanes, loading bays and loading bans etc. It can also be used in off street environments to provide a better service to users (yet its use in car parks is not permitted under current legislation). We propose the government chairs a review of the use of CCTV for parking purposes, examining each kind of contravention enforced and whether they are appropriate for CCTV enforcement.

**Q3. Do you think the traffic adjudicators should have wider powers to allow appeals?**

No, we do not feel that this is necessary; Parking and Traffic Adjudicators have wide ranging powers already. They can and do refer cases back to the Chief Executive of the issuing authority where compelling mitigating circumstances might apply with directions to reconsider the case, and adjudicators already have discretion to award costs. The grounds of appeal set out in the Traffic Management Act are sufficient.

Statutory guidance is something which local authorities must have due regard to and is not compulsory. It promotes consistency and yet supports localism. It would be inappropriate for adjudicators to be able to punish local authorities who, for good reason, depart from statutory guidance.

Statutory guidance is just that: “guidance”. If Parliament wanted to make it compulsory then it would have enshrined it in primary legislation. It would be inappropriate to use secondary legislation as if it were primary and thus usurp the will of Parliament. We believe that to do so would open the government to a Judicial Review.
Q4. Do you agree that guidance should be updated to make clear in what circumstances adjudicators may award costs? If so, what should those circumstances be?

Adjudicators always have the discretion to award costs. It may be appropriate for statutory guidance to make it clearer when awarding costs might be relevant.

We support the following statement, made by London Councils in their consultation response on this matter;

“If the plan would be to widen the grounds for adjudicators to award costs, this would give the appellant further incentive to appeal a Notice of Rejection, irrespective of their situation. This would lead to significant additional costs for authorities and the adjudication service. Currently costs are only awarded in 0.2 per cent of appeal cases at an average of £79 per appeal, at a total of £9,234 in 2011-12. The extra cost burden would therefore be largely down to the cost of the additional appeals generated rather the actual cost awards.”

Also, the Local Government Ombudsman has powers to deal with maladministration where a local authority acts unlawfully.

Q5. Do you think motorists who lose an appeal at a parking tribunal should be offered a 25% discount for prompt payment?

No, we do not agree; it completely misunderstands and undermines the purpose of the penalty charge in the first place. Additionally, it's likely to be costly to implement and operate, and more importantly, result in confusion for everyone. Is the government really advocating a 25% discount on the statutory parking penalty charge for parking illegally and losing an appeal?

We support the following statement, made by London Councils in their consultation response on this matter;

“It is not implausible that a further discount could triple the number of appeals to the adjudicator as motorists would have something to gain, even if the appeal was refused. This could lead to 200,000 appeals to the PATAS workstream a year, costing more than £30 million in the additional administrative overheads for London boroughs.”

If this further discount were introduced, it would be unfair on those motorists who have accepted the consequences of their actions and paid the PCN at an earlier stage. This may then deter motorists from paying the initial discount payment and it may promote vexatious or extraneous appeals which would overload the adjudication system and further add significantly to the costs of the service.

This additional discount undermines the effectiveness of the original penalty charge, since everyone who appeals and loses will, in effect, only pay 75% of the penalty charge. This will encourage additional appeals, as motorists may believe they have less to lose and give them false hope, and would then end up paying 75% of the penalty charge instead of the 50% initial discount charge.
Local Councils already have the option to accept the initial discount payment later than 14 days when motorists make representations to have the penalty charge cancelled. Most councils re-offer the discount for early payment when they reject representations; upon consultation within our membership, some of the representatives of our local authority members responded to this consultation stating that, under appropriate circumstances, they already offer motorists whose representations have been rejected at a parking tribunal a discount as a gesture of goodwill. This is not something that should be offered by default, but at the discretion of the councils as and when it is appropriate. This is local authorities exercising their discretion to reflect local circumstances and decisions.

The actual Penalty Charge set by law is the higher amount. We are unaware of any other justice system that parallels this procedure of being rewarded for losing your case.

Q6. Do you think local residents and firms should be able to require councils to review yellow lines, parking provision, charges etc in their area? If so, what should the reviews cover and what should be the threshold for triggering a review?

It is important to understand that there are no parking controls in place that have not been sanctioned and approved by locally elected Council members. We would, however, encourage regular reviews of all parking controls to ensure that they remain relevant. Locally elected Council members already have the powers to decide when and where parking controls are deployed and how they are enforced.

The way forward

We suggest that local authorities could run ‘partnership meetings’ to consult with residents, traders and local business in the communities, an opportunity to discuss matters such as this and canvass opinion on those affected by the decisions made. A similar procedure is already in place under Sections 5-7 of the Crime and Disorder Act 1998, which sees Community Safety Partnerships made up of representatives from police, fire and rescue authorities, probation service and the local authorities.

Q7. Do you think that authorities should be required by regulation to allow a grace period at the end of paid for parking?

Q7 and Q8 appear to overlap and are muddled in their approach. For clarity, essentially there are two types of parking control;

- **Permitted parking** where parking is allowed and sometimes controlled by time limit and which may be paid for or free (typically marked by white parking bays) and;
- **Prohibited parking** where parking is not allowed – all yellow lines. A double yellow line (DYL) indicates a 24/7 prohibition and a single yellow line (SYL) indicates a prohibition which is not 24/7. Otherwise there is no difference between a DYL and SYL prohibition.
There also might be loading controls in place shown by yellow kerb markings and associated signage.

Additionally, there is a fundamental difference between observation periods and grace periods, which are often confused. Observation periods are required and used every time a potential contravention takes place to ensure that, for example, loading and unloading is not taking place where such activity is not banned. However, a grace period is a period allowed after the permitted parking has taken place. The BPA produces a Parking Practice Note which explains the difference between a grace period and an observation period – this can be accessed here.

Furthermore, it is well established practice to set charges and controls at a level that will keep peak demand at no more than about 85% of capacity. This is because higher occupancy causes frustration and “searching” traffic, which is inefficient and environmentally damaging, whilst lower occupancy is not making efficient use of available space and is detrimental to the economic wellbeing of the locality.

The majority of local authorities already allow a grace period on permitted parking within their parking enforcement; therefore there is no need to regulate it. Typically grace periods vary according to the circumstances. It would be wrong to mandate something which is best determined locally.

If a set grace period time is documented in regulation, this takes away the ability to apply grace periods that are better suited to the local circumstances. If the government is truly concerned with revitalising the high street, it will leave local authorities to make this decision locally in the best interest of their communities.

One of our members explained in their consultation response that they offer grace periods in a number of their car parks; however, when it comes to free parking spaces on the high street, there is too high a demand for the spaces and it would be unfair to allow grace periods in a space which is already one, two, three or even four hours parking for free and in high demand by many other motorists.

If the ability to offer appropriate local grace periods is taken away, not only will this ensure that the grace periods are potentially unsuitable and therefore less effective, it will undermine the gesture of goodwill that a grace period offers.

Stipulated grace periods become the accepted norm. A regulated grace period of, for example, five minutes, will become known and accepted by motorists – a paid-for 1 hour parking ticket will then become 1 hour and 5 minutes. This will encourage motorists to ‘chance their luck’ on returning to their vehicle even later, which may put them at a higher risk of overstaying their allotted time and subsequently receiving a penalty charge. Additionally, there will be claims that "I was only six minutes - that's unfair".

The consultation question does not recognise the opportunities available with new technologies such as mobile phone parking apps, enabling motorists to be informed of expiry paid for times and the abilities for topping up remotely.

Q8. Do you think that a grace period should be offered more widely – for example a grace period for overstaying in free parking bays, at the start of pay and display parking and paid for parking bays, and in areas where there are parking restrictions (such as loading restrictions, or single yellow lines)?
The prospect of introducing grace periods for **prohibited parking** is unworkable; if there is room for people to park without causing a danger or obstruction to others then prohibited parking should be converted to permitted parking.

Grace periods in areas where parking is prohibited for traffic management or road safety purposes is counter-intuitive; they can also be counter-productive, since it will encourage people to disregard prohibited parking controls in general. This would encourage high volumes of “5 minute grace period parkers” to occupy kerb space, thereby preventing blue badge holders and delivery drivers from enjoying their statutory concessions. This will damage the revival of the high street.

**Q9. If allowed, how long do you think the grace period should be?**

The majority of the responses our members provided to this question stated that they offered a grace period on permitted parking, typically of 5 minutes. This inevitably varies, depending on the local needs and circumstances. This is why it should not be regulated. Mandatory grace periods become the expected norm and give rise to further claims of unfairness if the grace period is exceeded by short periods. Publishing a grace period exacerbates the situation. The very term grace period suggests that its application should be discretionary.

**Q.10 Do you think the Government should be considering any further measures to tackle genuinely anti-social parking or driving? If so, what?**

There are a number of objectives in the BPA Master Plan for Parking 2013/14 which support and underpin the objective to tackle genuinely anti-social parking or driving. Some of them are listed below and further details can be found in our Master Plan published at [www.britishparking.co.uk](http://www.britishparking.co.uk).

- **Everyone should know the rules and how to park compliantly**

  We believe that everyone who drives should know and understand why parking is managed and what the rules are. We believe the Driving Standards Agency, those who teach people to drive and other motoring and consumer organisations, informing motorists of parking law and best parking practice, have a role to play here.

  For example, approximately 650,000 new drivers join the roads every year, and we want to see emphasis placed on effective training and testing to ensure that all understand the importance of responsible parking and the effects this has on keeping our roads safe and congestion-free.

- **Every parking and traffic Order should be easy to understand and simple to implement.**

  We want to see a simplification of the Order making process to allow local councils to be more responsive to local needs. Government proposals to streamline the Order-making procedures which were scrapped in face of opposition from the newspaper industry in early 2013 should be resurrected. This would provide for greater transparency in the way in which parking controls were designed and implemented as local authorities could be more creative in the way in which they consulted the public instead of spending unnecessary funds on mandatory complex legal notices.
• No one should be able to avoid legitimate enforcement action by driving unregistered or untraceable vehicles.

The Government should recommence negotiations to enable the sharing of Registered Keeper / Vehicle Owner information throughout the EU.

We want to see better enforcement of the Vehicle Registration Acts. If a vehicle is properly registered outside the United Kingdom but elsewhere in the EU, it should still be traceable from the UK.

It is unfair that some people can avoid enforcement action by not complying with traffic and parking laws by failure to register themselves and/or their vehicles properly in accordance with the law.

The powers currently available to local authorities in London to address the serious problem of persistent evaders should be introduced nationwide.

• Everyone should respect parking concessions for people with disabilities, which should be more effectively managed.

We want to see better management and administration in the issue and distribution of Blue Badges. We welcome the introduction of new powers for local authorities to deal with abuse, misuse and fraudulent use of Blue Badges and we will work to encourage a greater use of these new powers. Improvements to the assessment of eligibility will ensure only those who have genuine need for a Blue Badge have access to designated spaces and facilities.

• Parking on footways causes obstruction and damage and should be properly managed.

We will support the call for uniformity and for local authorities everywhere to be able to manage footway parking more cost-effectively. People with disabilities or similar mobility challenges and those with baby buggies sometimes experience real difficulty in negotiating safe routes due to inappropriate and selfish obstruction of footways. Additionally, the costs for maintaining damaged footways are significant in some cases and may not be sustainable. In London, parking on the footway is prohibited except where the highway authority deems that it is safe to do so and traffic signs indicate this. The reverse is true in the remainder of the UK causing confusion amongst motorists and inconsistency in enforcement.

• Every Penalty Charge Notice should look the same

We want to see the introduction of a standardised document for Penalty Charge Notices (PN) and other statutory notices used in local authority parking enforcement. There is a precedent for this in Wales from 2013 and we encourage its adoption throughout the UK. A standardised PCN simplify the administration and delivery of civil parking enforcement and adjudication thus promoting fairness and transparency for everyone.

• Proper and effective parking and traffic management is essential to support sustainable growth in our high streets

We want to see that local traffic authorities across the UK have the power and the tools to effectively manage traffic and parking. The importance of the contribution of
effective parking and traffic management needs to be properly embraced, including the need to allow local authorities to enforce moving traffic contraventions to reduce congestion, improve accessibility and reduce accidents. Energy efficiency is also an important aspect of the operation of parking services and we will encourage the adoption of sustainable energy systems and support the provision of facilities for low emission vehicles.

- **Every car park should be properly serviced and maintained**

  We want to see more emphasis on life care planning for all of Britain’s car parks and appropriate funds should be set aside to ensure that they can be properly serviced and maintained. Premature or unplanned closure of multi-storey car parks has a detrimental effect on the communities the car parks serve and works against the regeneration of town centres. Owners and operators should prepare and implement a Life-Care Plan and undertake regular structural safety inspections which will identify defects and prompt repairs to minimise the risk of structural failure. The BPA is concerned that many ageing car parks are not properly serviced and maintained. Too many are being closed for safety reasons and are therefore prematurely reaching the end of their useful life.
Appendix A – Photos and journalism promoting the Oldham CCTV Safety Car
Double trouble
School in fresh safety plea after same two drivers return to flout strict parking laws

School-run drivers face fines for illegal parking

Oscar winner Mikey
Appendix B – photos and journalism promoting the Bromley zig-zag study

NEW warning signs are being put up outside schools across the borough urging drivers to steer clear of zig-zag road markings.

The yellow and black signs will be attached to lampposts to remind motorists they face a £120 fine for parking on the zig-zag lines.

Executive councillor for the environment Councillor Colin Smith said: "Thoughtless and selfish drivers who choose to park on the zig-zags are being warned of the consequences of their actions."

"These markings are in place to ensure approaching drivers can see children entering and leaving the school and children can see passing vehicles."

"Potentially fatal accidents can be avoided if motorists park their vehicles correctly near schools."

The first signs have been put outside Crofton infant and junior schools in Towncourt Lane, Petts Wood.

Find more education news at

newsshopper.co.uk/education