

BRITISH PARKING ASSOCIATION

DRIVING ISSUES, RAISING STANDARDS



CHELSEA HOUSE, 8-14 THE BROADWAY
HAYWARDS HEATH, WEST SUSSEX, RH16 3AP
TELEPHONE +44 (0) 1444 447300 FAX: +44 (0) 1444 454105
www.britishparking.co.uk info@britishparking.co.uk

Centre for Connected and Autonomous Vehicles
Department for Transport
33 Horseferry Road
London
SW1P 4DR
Emailed to: consultation@ccav.gov.uk

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Dear Sirs,

Remote control parking and motorway assist: proposals for amending regulations and the Highway Code

About the British Parking Association

We welcome your consultation on **Remote Control Parking and Motorway Assist: proposals for amending regulations and the Highway Code**. We are the largest, most established and trusted professional association representing parking and traffic management in Europe, and the recognised authority within the parking profession. We represent the best interests of our members and the parking community and provide an extensive range of membership services to support parking professionals & organisations in their day-to-day work. Our diverse membership community of around 700 organisations includes technology developers & suppliers, equipment manufacturers, learning providers, consultants, structural & refurbishment experts, local authorities and parking on private land operators including retail parks, healthcare facilities, universities, airports and railways stations.

For more information regarding the BPA and our Blueprint please click [here](#).

BPA response to the Consultation

Before we turn to the individual questions in the consultations we wish to make a general point. Parking policy has a major influence on people's travel decisions and therefore on people's mobility. Proper and effective traffic management is vital in our towns and cities and as society evolves and the likelihood of congestion increases, it is important to encourage public acceptance of advances and innovations in new technology helping to deliver parking solutions and services which enable a more mobile society. As such we welcome technological developments that genuinely improve people's mobility options and access to transport.

We are proposing 3 possible options for remote control parking, which is your preferred option?

Option 0: Change nothing

Option 1: Change regulation with use of statutory instrument

Option 2: Change with use of SI and make appropriate changes to the Highway Code

Option 2

Question 1: Are you content with the draft amendments to Regulation 110 (not using hand-held mobile phones while driving) to enable remote control parking?

We are particularly interested in this section of the consultation. We want to ensure the safety of drivers and other road users when the use of hand-held devices is necessary; this includes, any other road users near them and any nearby property, whether personal, private or publicly owned. It is essential that any regulatory framework allows for clear definitions of driver control [of a vehicle] to ensure that there can be clear management and understanding on the part of drivers and clear enforcement actions where this is required.

In the examples for the change in text, it outlines the use of a mobile device to command the vehicle to automatically drive into, or out of a parking space. This may present practical issues for any car park structure, as consideration needs to be given to whether there is appropriate provision for the driver to stand outside the vehicle in a safe place and control its movements. If this approach requires redesign of parking facilities to accommodate this then the costs of doing so must be considered. Having taken this into consideration it must also be recognised that transition arrangements for any adaptations may be prolonged.

Additionally, there is the potential for the adoption of this technology to lead to reduced capacity in parking facilities and for creating additional congestion in the car park, either because some drivers will be standing and operating their remote controls in areas where other cars are manoeuvring, or by [autonomous] cars operating at very low speed and stopping when they identify hazards.

Highway Code ADAS guidance

Question 2 In addition, should we make changes to the Highway Code to reflect this regulatory change?

it is important that the Highway Code is clear about what is and isn't allowed with the use of a mobile device and to reflect any changes in the law with regard to the use of autonomous or semiautonomous vehicles. Consequently, we agree that changes to the Highway Code is the best way provide consistency and wide enough publicity, is generated to ensure that people are properly informed and that clear standards are produced.

Question 2A: Are you content with the text amendments of the Highway Code in a way that would clarify rule:

149, related to use of use of a mobile phone and in-vehicle technology?

The language used is clear and concise, we would suggest that the wording includes the clarification that the driver be within standing distance of the vehicle.

Question 2B: Are you content with the text amendments of the Highway Code in a way that would clarify rule:

150, related to use of driver assistance systems and distraction?

Yes No (If no) Why not?

Yes, we are content with the text amendments they are clear and concise, and continue the current expectation that operators are responsible for their vehicle.

Question 2C: Are you content with the text amendments of the Highway Code in a way that would clarify rule:

160, relating to driving with both hands on the wheel?

It is essential that the regulatory framework clearly defines a position of control to ensure driver understanding and clear enforcement. We would advise the government to be clear in any additional regulations or legislation to manufactures, about the level of control they are expecting from the driver. If we do not have clarity that manufacturers will be conforming to universal standards, then we risk the possibility that there will be subtly different operating procedures, leading to confusion for motorists and the inherent dangers that this presents.

Question 2D: Are you content with the text amendments of the Highway Code in a way that would clarify rule:

239, relating to parking technique? * Yes * No

Yes. The safety of the driver using these systems, road users surrounding them and people's property, should be paramount in any changes to the Code. As we laid out in our answer to question 1, while we wish to support the development of technology and innovation, we must emphasise that we would like to see safety made a priority.

Question 3: Should we include a recommendation within the Highway Code that vehicle operators confirm with the manufacturer if the remote-control device/app they plan to use is compliant with the international standard?

We would recommend that the government ensure that all manufacturers confirm to internationally recognised standards for remote-controlled features. There are not too many sectors where consistency is not encouraged, we hope the Government would always push for the highest regulatory and operational standards, particularly in a field where there is so much investment and research being conducted.

Question 4: What other advanced driver assistance systems or automated vehicle technologies that are likely to come to the UK market in the next 2-4 years should we be considering? What are these systems?

Camera technology in parking

We suggest that the government look at altering the regulations to support other technology in parking. One of the most effective ways of making it easier for motorists to park without the stress of having to worry about how long they are parking, is to embrace new technology such as automatic number plate recognition (ANPR). The use of ANPR enables motorists to park without immediately paying, to stay as long as they like and make payment either on their return or online within, say, 24 hours. This technology is already in widespread use in the private sector, the London congestion charging scheme, and the governments' Dart-charge on the Dartford crossing.

However, local authorities do not have the powers to use ANPR in this way, the Deregulation Act placed restrictions on the use of CCTV by local authorities operating Civil Enforcement Powers under the Traffic Management Act. Cameras (CCTV and ANPR) are useful tools to properly manage parking and Government should not ban them but should properly regulate their use for specific, locally-defined purposes. In some areas where the use of a Civil Enforcement Officer is not practical, the use of cameras can be helpful.

We urge the government to revisit this issue as part of this discussion and to recognise the value such technology brings particularly to users in pre-booking technology, paying on departure and improved access for people with disabilities, and most particularly in relation to hard pressed traders and shopkeepers who rely on trade from car-borne customers in many UK towns and cities.

Research into technology and innovation in parking

Beyond the above example, we have identified a need to explore the various opportunities which technology presents to the parking sector and those working within it. We are witnessing a major shift which will evolve from a very fragmented way of delivering parking services to something which is consistent, simpler, aided by technology, and where practitioners and providers can deliver a much more holistic service that benefits everyone.

Our report [Parking 20:20](#) follows research commissioned to explore the future of parking and intelligent mobility, identifying seven key areas where our efforts must be directed:

- **Data and Apps**
- **Payment**
- **Integration**
- **Real-Time Data**
- **Shared Mobility and Car Clubs**
- **Electric Vehicle Charging**
- **Autonomous Vehicles**

The research seeks to identify the future role of parking and the impact of changes in technology and mobility, pointing to changes in the way that parking services are being managed and delivered.

The future of parking will change rapidly over the coming years and new products and services will enter the market, disrupting many aspects of the parking profession. As the leading association for parking professionals, we are committed to supporting our members, and helping to identify the opportunities and threats that change, and innovation will bring to the sector.

Acting in fields such as data integration, innovation in payment processes, autonomous and electric vehicles will ensure parking is at the heart of future mobility discussion and that the parking profession is well prepared for the future. The research suggests that despite most trips starting or ending with parking, the parking profession needs progressive integration with the rest of the Transport Network. We therefore want to ensure that the parking profession and the services it provides are integral to that and support the creation of a more holistic transport policy, that meet local needs and address environmental concerns.

We believe that by establishing links to other stakeholders including, but not limited to, intelligent mobility groups, mobile phone companies, car manufacturers, intelligent transport providers, academia, government, local authorities, health trusts and the private sector, we can together build a policy consensus and ensure that the parking profession is integrated with the rest of the Transport Network.

We will be conducting further research to focus on establishing progressive standards for the use of new technology within the parking sector and help to showcase where the parking

sector has an important role to play on the development and deployment of future intelligent mobility.

In Summary

The development of this type of technology is exciting and creates benefits and opportunities for motorists and those managing parking. However, we believe that Government must manage the implementation of that technology in the most effective and coherent way possible.

We are always very willing to work with Government to develop parking policy and are at your disposal to assist with any further information, advice or support in relation to this very important area of public policy.

Please do not hesitate to contact my colleague **Glenn Dives** by emailing consultations@britishparking.co.uk or calling **01444 447 300** if you require any further information.

Yours faithfully

A handwritten signature in black ink that reads "Kelvin Reynolds". The signature is written in a cursive style with a horizontal line extending to the right.

Kelvin Reynolds
Director of Corporate and Public Affairs