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Emailed to: lezconsultation@transport.gov.scot with a copy of your response, along with the Respondent Information Form

Dear Sirs,

Response to the Building Scotland's Low Emission Zones Consultation

About the BPA

We welcome your consultation 'Building Scotland's Low Emission Zones'. The BPA is a not-for-profit membership association and the largest, most established and trusted professional association representing parking and traffic management in Europe. Founded in 1970, we are the recognised authority within the parking profession representing a diverse membership community of around 700 organisations and individuals and provide an extensive range of membership services to support parking professionals in their day-to-day work.

We maintain an active presence in the Scottish transport environment, with our annual exhibition and seminar event provided by our Scottish Group, Parking Scotland. The event gives parking professionals the opportunity to develop knowledge, share expertise, raise issues, challenge current thinking, consider the present and look to the future.

We are committed over the next 5 years to contributing towards supporting and encouraging investment and innovation into sustainable products and services, as laid out in our [Blueprint for Parking](#).

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

BPA response to specific consultation questions

I am pleased to set out below our response made on behalf of our members. The specific sections of this consultation we will be replying to are:

- **Question 1:** the principle of LEZ's
- **Question 2:** relating to the primary objective of the LEZ's
- **Question 6:** relating to our views of Automatic Number Plate Recognition
- **Question 13:** On what actions local or central government could consider in tandem with LEZs
- **Question 15:** On what measures could address road congestion and air pollution.

Technology is revolutionising the way people travel, and we want to drive innovation, investment and social responsibility throughout the parking profession. Parking policy has a major influence on people's travel decisions and on people's mobility. Proper and effective traffic management is vital in our towns and cities; as society evolves and the likelihood of congestion increases it is important to encourage the public to accept and adopt new technology which can help to deliver better and smarter parking solutions, and services which enable a more mobile and accessible society. The majority of road journeys start or end with parking and, as we prepare for a future increasingly dependent and driven by technology and innovation, we want to see parking policy and provision at the heart of future mobility and air quality discussions.

Consultation Response

1. Question 1: Do you support the principle of LEZs to help improve Scottish air quality? Please be as specific as possible in your reasoning.

We support the principal of the Scottish Government utilising LEZ's to try and control air pollution in Scottish cities. We believe that there is a need to adopt emissions based parking policies in all city centres and car parks and areas affected by poor air quality. There should be incentives for those driving ultra-low emission vehicles (ULEV) and a scale of charges associated with vehicle emissions. This would provide everyone with the tools to manage and reduce air quality.

We believe that alongside the use of LEZ's the Scottish Government should look to both utilise and seek to reform Traffic Regulation Orders (TRO). By utilising TRO as means of limiting or reducing traffic, it could help support the operation of LEZ's. But any such use of TRO should coincide with a review of the TRO procedures. This is principally because the current procedures are outdated, fail to recognise modern communication and consultation techniques and as a result are costly and time-consuming, relying upon publication in local newspapers.

2. Question 2: Do you agree that the primary objective of LEZs should be to support the achievement of Scottish Air Quality Objectives? If not, why not?

We would agree with the Scottish Government that the primary objective of LEZs in Scotland should be to support the achievement of Scottish Air Quality Objectives, by reducing the presence of Nitrogen dioxide and particulate matter in the air.

As a minimum any LEZ would be expected to:

- be in response to a clearly defined air quality problem and ensure this is understood locally;
- have in place signs along major access routes to clearly delineate the zone;
- be identified in local strategies including (but not limited to) local plans and policies and local transport plan at the earliest opportunity to ensure consistency with local ambition;
- provide active support ULEV vehicle take up through facilitating their use;
- include a programme of awareness raising and data sharing;
- include local authorities taking a lead in terms of their own and contractor vehicle operations and procurement in line with this framework;
- ensure bus, taxi and private hire vehicle emission standards are improved to meet Clean Air Zone standards using licensing, franchising or partnership approaches as appropriate; and
- support healthy, active travel.

On a wider level we have identified the following themes as outcomes LEZ would be expected to deliver:

- supporting local growth and ambition (decoupling growth and pollution).
- accelerating the transition to a low emission economy.
- immediate action to improve air quality and health.

3. Question 6: What are your views on Automatic Number Plate Recognition enforcement of LEZs?

We are a strong supporter of this technology and believe that government should allow and encourage the use of Automatic Number Plate Recognition (ANPR) by local authorities for parking enforcement as well as other congestion and traffic management measures.

Private car park providers already use these tools successfully across the UK. We see the main advantages of this system being that it enables motorists to park without paying up front, to stay as long as they like and to make payment either on their return or online within, say, 24 hours. This is the same technology behind the current London congestion charging scheme and the Highways England Dart-Charge on the Dartford crossing.

4. Question 13: What actions should local or central government consider in tandem with LEZs to address air pollution?

We believe that technological innovation is vital to the parking sector. As such we would suggest that a scheme that could run in conjunction with a LEZ would be a Workplace Parking Levy (WPL).

A WPL is a demand management technique, designed to shape the entire journey that consumers make by controlling parking. By designating a price for the use of a [previously free] parking space, it makes use of the price mechanism to guide drivers to make different choices about the relative costs of the type of journey they are making. This shift in perception can in time lead to consumers making different choices about their journey, for example making use of public transportation or carpooling and thus help to address the problem of congestion. At present the only WPL in operation is being pioneered by Nottingham Council.

Other actions which we would suggest for both devolved and national governments to pursue is encouraging the uptake of electric vehicles and an increase in the installation of Electric Vehicle (EV) charge points. Road transport contributes around a fifth of man-made greenhouse gas emissions and the sector's share has been growing. The last three years have seen a remarkable surge in demand for EVs in the UK. There has also been an increase in the number of electric and plug-in hybrid models available in the UK. To build up that growing demand their need to be greater encouragement for firms to provide more recharging points.

Ensuring that the EV charging infrastructure is sufficient to support the needs of EV users is also a challenge, given that convenient access to charging facilities is a necessity and that not all houses have the capacity to install EV chargers. To address this, the Office for Low Emission Vehicles (OLEV) has introduced grant schemes to support homeowners, local authorities and employers with the costs of installing EV charging equipment.

We continue to inform and facilitate changes in the sector and have recently established an EV working group as part of our Parking 20:20 initiative, comprising of charge-point providers, car park operators and key stakeholders. The group has been established to ensure that the parking community supports the increasing use of alternative energy sources for electric vehicles by providing relevant recharging infrastructure. A recent survey of local authorities regarding future plans for installation showed that 51% of authorities are planning to increase the number of EV charging points and of those, 16% are dependent upon funding, 34% currently had no plans for new installations. The survey also revealed heavy imbalances across the country, with 25 authorities having no charging points. Of those Scottish authorities surveyed, a total of 0.60 charging points per car park was revealed, this was higher than the national average of 0.39.

5. Question 15: What measures (including LEZs) would make a difference in addressing both road congestion and air pollution emissions at the same time?

As outlined in our answer to question 13 we would suggest that a WPL scheme as pioneered by Nottingham City Council would be an effective measure to reduce road congestion while working with the LEZs.

Nottingham is the only authority to have launched a WPL in the UK. Our support for the WPL is based upon research we sponsored into the effectiveness of the Nottingham scheme. The research was conducted by Mr Simon Dale, Dr Matthew Frost, Prof. Stephen Ison, Prof. Mohammed Quddusa, and Mr Peter Warren, from the centre for Innovation and Collaborative Construction Engineering at Loughborough University and the highway Metrics Team at Nottingham City Council.

Their research, involved a statistical analysis of car users in Nottingham to see what was motivating their behaviour and how effective the Parking Levy was in changing motorists' actions. Their research indicates that the introduction of the Parking Levy had a statistically significant impact on congestion in Nottingham. The results of their study showed that the charge even after factoring in all other variables, had led to a reduction in average journey time as expressed by the term Delay per Vehicle Mile (DVM), which is a numerical expression of the how long it takes a vehicle to make a journey. Positive results such as the Nottingham scheme demonstrate the potential benefit of such proposals in reducing congestion and improving consumer experience.

We support the principles of a Workplace Parking Levy, the benefits of which are already beginning to be seen in Nottingham. We believe further cities are exploring the opportunity to introduce it. The use of the additional revenue from the scheme can also be used to improve sustainable transport facilities also makes these kinds of charges more acceptable and can provide a so called 'double benefit'

An additional measure which could significantly reduce congestion and pollution would be the integration of technologies and regulations that would support the use of smart parking technologies. With 30% of city centre drivers looking for a parking space at any one time, finding the spaces easily means to helping them motorists park quickly will have a rapid effect upon congestion, pollutants and on greenhouse emissions. There are a variety of technologies in the market place already which aide drivers to book parking spaces and plan their journey. But there is more that government could do to encourage parking operators to take up and support such technology. All of this is set out in our [Blueprint for Parking](#).

In Summary

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.

The importance of this subject is clear by the wide discussion we have encounter across the sector. We hope you find these comments of interest. We are ready to work with the Scottish government to achieve its desired aims and look forward to discussing with you how we can assist in taking these issues forward.

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



Kelvin Reynolds
Director of Corporate and Public Affairs