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Dear Sir's

Response to the Draft Mayor's Transport Strategy 2017

About the BPA

The British Parking Association (BPA) welcomes your consultation 'Draft Transport Strategy'. As the largest parking professional association in Europe we represent around 700 organisations by promoting and influencing the best interests of these members and the parking and traffic management sector throughout the UK and Europe. These organisations are many and varied and include manufacturers, car park operators, local authorities, health authorities, universities and higher education facilities, airports, railway stations, shopping centres, theme parks, construction companies, learning providers and consultants.

We are committed over the next 5 years to contributing towards the reform of the Blue Badge, as laid out in our [Blueprint for Parking](#). We would welcome changes that would improve the service for Blue Badge holders and the efficiency of Local Authorities' (LA) enforcement of the scheme.

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

BPA response to specific consultation sections and questions

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

- Consultation Question's from Chapter 3: Healthy Streets and Healthy People;
 - Question 3
 - Question 4
 - Question 8
 - Question 9
 - Question 10
 - Question 11
- Consultation Question from Chapter 4: A Good Public Transport Experience;

- Question 12
- Consultation Questions from Chapter 5: New Homes and Jobs;
 - Question 18
 - Question 19
- Consultation Question from Chapter 5: Delivering the Vision
 - Question 21

4) Policy 1 and proposals 1-8 set out the Mayor’s draft plans for improving walking and cycling environments (see pages 46 to 58). – To what extent do you agree or disagree that these plans would achieve an improved environment for walking and cycling? Please also describe any other measures you think should be included.

The BPA is broadly supportive of the Mayor’s plans but has some reservations, which we will set out in this response. We believe that parking on and obstruction of the footway is wrong and we are pleased that London has effective powers to regulate this type of parking to assist pedestrians, disabled people, the elderly and people with baby buggies.

It is a matter of road safety and an important issue and one that affects many communities, these are just some of the reasons why proper and effective management of footway parking is so essential.

While this is an important issue we cannot lose sight of the reason why these situations arise, namely the overwhelming demand for kerbside parking. This is especially the case from residents living in properties where there was little demand or provision for parking facilities when the housing accommodation was originally built.

In light of the Mayor’s proposal we must also point out that simply by redesigning streets and encouraging people to walk and cycle does not necessarily remove the needs or desires for people to own a car, so the continuing provision of parking space needs to remain a part of future planning.

We believe that providing and managing parking on street needs to be seen in the context of delivering a better and fairer service to the pedestrian, resident and motorist. We have worked with and will continue to work with Guide Dogs UK, Disabled Motoring UK, Living Streets, and other organisations to promote the adoption of London’s example development of common standards in the management and enforcement of parking on footways and areas used by pedestrians across the UK.

8) Proposals 18 and 19 set out the Mayor’s proposed approach to road user charging (see pages 81 to 83). – To what extent do you agree or disagree with this proposed approach to road user charges? Please also describe any other measures you think should be included.

We believe that the Mayor’s proposals are innovative and could have a significant impact on congestion in the city. The BPA would in principal support the objectives of a Workplace Parking Levy (WPL) in London, however further consultation is necessary with local authorities and businesses. Principally we support it because of its effectiveness in reducing congestion. Nottingham is the only authority to have launched a WPL in the UK, it is a demand management technique, designed to shape the entire journey 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 cost of their type of journey. This shift in perception can in term lead begin to address the problem of congestion.

The BPA sponsored some research to look at 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 motorist's actions. Their research indicates that the introduction of the Paring 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 and have already begun to see the benefits the Levy has brought to Nottingham. We believe further cities are exploring the opportunity to introduce it. Hypothecation of funds to improve sustainable transport facilities also makes these kinds of charges more acceptable and can provide a so called 'double benefit'.

10) Policies 5 and 6 and proposals 22-40 set out the Mayor's draft plans to reduce emissions from road and rail transport, and other sources, to help London become a zero-carbon city (see pages 86 to 103). – To what extent do you agree or disagree that these plans would help London become a zero-carbon city? Please also describe any other measures you think should be included.

We are a strong supporter of technological innovation in the parking sector. We believe there are opportunities to relieve congestion to improve air quality and access to high streets and town centres through the sustainable use of vehicles and are committed to ensuring that the parking profession understands these demands, reacts to them to provide the infrastructure and services to facilitate these changes, and meets the expectations of government, regulators and customers.

The BPA Parking 20:20 project has identified a need to explore the various opportunities in technology as well as potential threats and challenges that face the parking profession and those working within it. There is little doubt that we are witnessing a major shift which will transport us from what is perceived by many motorists as a relatively 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.

The BPA is keen to connect emerging technology to people's mobility aspirations through developing new parking policy. The BPA has formed a new group of parking and transport

experts to explore these exciting and yet thought-provoking opportunities, commissioning research to identify trends in future in so-called intelligent mobility.

Our report Parking 20:20 follows research commissioned to explore the future of parking and intelligent mobility. Conducted by Imperial College Graduate Justus Loebler, the report identifies seven key areas where the BPA's 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 designed, provided, 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 existing 'norms' and some aspects of the parking profession. As the leading association for parking professionals, the BPA is committed to supporting our members, and helping to identify the opportunities and threats that change and innovation will bring to the sector.

We believe that by establishing links to other stakeholders including, but not limited to, electric vehicle manufacturers and charge point suppliers, 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.

The BPA will be conducting further research to focus on establishing progressive standards for the usage of new technology within the parking sector. Also, it will showcase where the parking profession has an important impact on the development and deployment of future intelligent mobility. Parking policy has a major influence on people's travel decisions and therefore on how people move and become mobile. Technology is revolutionising the way people travel, and we want to drive innovation, investment and social responsibility in the parking profession. 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 mobile society.

The BPA believes the biggest contribution that the parking community can make towards your strategy is improving the user experience and speeding up the process through which customers can park. With 30% of city centre drivers looking for a parking space at any one time, finding the spaces easily means helping motorists park quickly will have a rapid effect upon congestion and on greenhouse emissions. By being more flexible in how they manage their assets then both local authorities and private providers can make a significant

contribution towards easing congestion and lowering greenhouse gas emissions. All of this is set out in our Blueprint for Parking.

One of the key technologies already in use with private car providers is Automatic number plate recognition (ANPR), which enables motorists to park without paying, to stay as long as they like but to make payment either on their return or online within, say, 24 hours. This is the same technology behind the current 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.

We have long campaigned on this issue and urge the government to revisit this issue 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. Such technology is readily used in private car parks and we believe local authorities should be able to use it too.

The use of ANPR also opens the door to other new technologies and techniques. Through linking the data from cameras, it is possible to maintain a real-time count on the number of spaces available in any given street or car park. This data can be used by consumers to plan journeys before they leave but also on the way to their destination. Indeed, we are already seeing the development of and uptake of Apps, that show consumers what parking spaces are available, the difference in pricing allowing them to make comparisons as well as purchase a discounted ticket before they arrive.

Beyond some of the innovative uses of data capture and analysis we are seeing the increasing integration of other technologies into the parking landscape. As noted in our Blueprint for Parking, we are already promoting the installation and adoption of electric vehicle charge points and other alternative fuel systems into existing parking infrastructure, as well as the implementation of sustainable structures, including low-energy lighting and solar panels. Indeed, the need to speed up this integration process is becoming more and more important with an electric car being registered every 3 minutes in the first 3 months of 2017¹.

Everything we have said thus far assumes that car ownership and use remains as projected. However, techniques and opportunities exist to alter car ownership models and to limit car use to relieve congestion. Consequently, it should be remembered that parking policy, and for example pricing, can be used as a demand management tool helping to reduce and relieve congestion as demonstrated in Nottingham. This is where we feel that the Mayor's proposals really could have the most impact.

11) Policies 7 and 8 and proposals 41- 47 set out the Mayor's draft plans to protect the natural and built environment, to ensure transport resilience to climate change, and to minimise transport-related noise and vibration (see pages 104 to 111). – To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included. Maroon

¹ Electric car market statistics from Next Green Car <http://www.nextgreencar.com/electric-cars/statistics/>

We actively promote the parking sector by advancing knowledge, raising standards and professionalism, and using our influence to deliver excellence for the benefit of all.

Some 20 years ago, there was a major failure in the structure of a UK car park (the Pipers Row failure) fortunately without the loss of life. Since then our members have placed much focus on the structural integrity of parking facilities and this costs money.

We believe that good quality, well designed and properly maintained car parks can contribute significantly to the prosperity of Britain's towns and cities. We have worked diligently towards this by sharing best practice, encouraging fair, reasonable and legitimate parking enforcement, and the promotion of safer parking through the Safer Parking Scheme and Park Mark award². In light of the challenge of climate change, we encourage our members to adopt a range of energy saving and green technologies as outlined in our answer to question 10.

18) Policy 19 and proposals 75 to 77 set out the Mayor's draft plans to ensure that new homes and jobs are delivered in line with the transport principles of 'good growth' (see pages 193 to 200). – To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included.

Whilst we agree with the environmental aspirations of the proposals, we nevertheless would express concerns about the plans which aim to eliminate all parking provision at new builds near to transport links and limit them for the other new builds. As elaborated earlier, we would have reservations around the likely demise of the motor car. The reason for our reticence towards the proposal is the concern that limiting or removing the provision of parking spaces, may have the opposite effect to the one that is intended; namely reducing congestion and encouraging residents to walk, cycle or use public transport.

We say this because we cannot assume that the greater provision of improved transport links and encouragement to walk or cycle will lead inexorably towards a reduced demand for parking. Indeed, with the rise of new technologies we could see the continuation of existing demand or even its expansion - hybrid cars, electric cars and even self-driving cars are already disrupting the car market. With some estimates suggesting that there could be 21 million self-driving cars on the world's roads by 2035³, without considering the remaining non-self-driving cars, there is still going to be a large demand for cars that require parking spaces.

A policy that seeks to remove parking spaces from new build, no matter how well intentioned, must remain flexible to meet the demands of ordinary people or else it may only increase the prevalence of parking on pavements.

² The BPA manage the Safer Parking Scheme and the registered Park Mark on behalf of the Association of Chief Police Officers. The scheme is for public and private operators and aims at reducing crime and the fear of crime in parking facilities. Safer parking status, Park Mark, is awarded to parking facilities that have met the requirements of a risk assessment conducted by the Police. These requirements mean the parking operator has put in place measures that help to deter criminal activity and anti-social behaviour, thereby doing everything they can to prevent crime and reduce the fear of crime in their parking facility.

³ IHS Automotive, June 2016

21) Policy 21 and proposals 97 to 101 set out the Mayor's proposed approach to responding to changing technology, including new transport services, such connected and autonomous vehicles (see pages 258 to 262). – To what extent do you agree or disagree with this proposed approach? Is there anything else that the Mayor should consider when finalising his approach?

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.

Our Parking 20:20 research suggests that despite the majority of 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 the Transport Strategy to create holistic transport policies 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 usage of new technology within the parking sector. Also, it will showcase where the parking profession has an important impact on the development and deployment of future intelligent mobility.

Conclusion

Appropriate parking control is vital to ensure that parking facilities remain accessible and provide value for money, both for the town and city centres providing access, and for the drivers accessing the facilities.

Encouraging innovation, investment and the fair and effective use of technology will improve the delivery and management of parking services and keep the consumer at the heart of our thinking.

By building a consensus with all stakeholders and informing and influencing government, we will ensure that the opportunity presented by future intelligent mobility is realised throughout our membership.

The BPA is always very willing to work with the Mayor of London and Transport for London to develop car parking policy, manage congestion better and support the fight against climate change. The Association is at your disposal to assist with any further information, advice or support in relation to your proposals.

Please do not hesitate to contact my colleague Glenn Dives by emailing consultations@britishparking.co.uk or calling 01444 447 317 if you require any further information.

Yours sincerely



Kelvin Reynolds
Director of Policy and Public Affairs

Endnote

About the British Parking Association:

The British Parking Association (BPA) is the largest professional association in Europe, representing around 700 members in the parking and traffic management profession. Our members include manufacturers, learning providers, consultants, local authorities, car park operators, including those managing parking on private land such as retail parks, healthcare facilities, universities and railway stations. We have 144 members managing parking on private land and 250 local authority members. We provide our members with knowledge and a range of benefits and resources that assist them in their day to day work.

As the recognised authority within the parking profession, we represent, promote and influence the best interests of the parking and traffic management profession throughout the UK and Europe. We also manage initiatives for the sector including the Safer Parking Scheme (on behalf of the Association of Chief Police Officers), the Approved Operator Scheme (for those managing parking on private, unregulated land) and our stakeholder engagement group, the Parking Forum.

We place the consumer at the heart of our thinking and as the recognised authority in parking we actively represent and promote the sector by advancing knowledge, raising standards and professionalism, and using our influence to deliver excellence for the benefit of all.

For more information regarding us here at the BPA, please click [here](#).