



18 April 2019

Road Safety Inquiry

Dear Transport Select Committee

Written evidence submitted by the British Parking Association.

Executive Summary

The British Parking Association recommends:

- Helping local authorities to more efficiently manage traffic and by extension road safety by standardising and digitising Traffic Regulation Orders (TROs). This will also allow connected and automated vehicles (CAVs and AVs) to navigate roads and kerbsides.
- Giving local authorities outside of London the power to better manage pavement parking so people with prams, wheelchairs, visual impairments and the elderly are not forced to walk on the road. We note the Committee also has a Pavement Parking Inquiry and will respond to it separately.
- Making it legally possible for local authorities to retain unsafe (no MOT), untaxed and uninsured vehicles and impound them for non-payment of parking penalties, even when those parking penalties have been paid. We invite Transport Select Committee members to witness gathering the research evidence, which illustrates why we make this recommendation.
- Improving the management of parking outside schools, including school keep clear zones where children are particularly vulnerable and research the success of implementing so-called 'Bobby Zones' as in Manchester and similar area wide traffic management schemes during school hours.
- Supporting local authorities and allow them to innovate and use new and emerging technologies and systems to both maintain and improve parking patrols which are proven to help keep our streets safe, free from obstruction caused by indiscriminately parked cars; improve road safety, keep children safe when they come out of school, protect spaces for residents and vulnerable groups, high street deliveries, that would become congested if parking wasn't managed.
- Encourage political leaders and people of influence to cut the rhetoric and enable Civil Enforcement Officers (CEOs or parking attendants) to do their job of parking control, free of fear and without physical abuse or verbal harassment; support our campaign to Halt the Hate (#HaltTheHate) of CEOs.
- Increase the deterrent by introducing tougher sentencing for those convicted of assaulting a CEO.

1. Introduction

1.1 The British Parking Association is a not for profit organisation that represents, promotes and influences the parking and traffic management profession throughout the UK and Europe. Our membership of more than 750 organisations and individuals includes local authorities, car park operators, retail parks, healthcare facilities, universities, railway stations, technology providers, trainers and consultants.

1.2 We work with our partners to support growth for our communities, improve compliance by those managing and using parking facilities, and encourage fairness to achieve our vision of excellence in parking for all. Surplus income arising from our work is reinvested to support our members or put into a reserve fund to ensure we can continue to raise standards and encourage professionalism.

2. Our reason for submitting this evidence

We believe our recommendations on effective parking management can help to reduce the number of people who die in road traffic accidents; drivers, passengers, cyclists and pedestrians. Road safety underpins much of the work our members do, over 200 of whom are local authorities.

3. Pavement parking

3.1 We campaign closely with Living Streets, Guide Dogs and the Walking and Cycling Alliance to call on the government to prevent obstructive pavement parking, which is still permissible outside London. We know from talking with our campaign partners and local authority members this is a growing concern especially amongst vulnerable groups. It is not acceptable to have vehicles parked on pavements forcing people to walk on the road, in particular those with prams, wheelchairs, and people with visual impairments.

3.2 London local authorities have the power to prohibit pavement parking by making traffic regulation orders (TROs) under the Road Traffic Regulation Act 1984. They may also use bollards to protect pavements physically. In the summer we campaigned on the basis that that there had been 1000 days of inaction on this issue and the announcement on whether similar or differing powers will be granted to local authorities outside of London is yet to be announced. We will respond in more detail to the Pavement Parking Inquiry.

4. The Positive Parking Agenda (PPA+)

4.1 We support an important local authority initiative called the Positive Parking Agenda (PPA+) which aims to improve the perception and challenge the misconceptions about the parking sector and make the parking experience better for all. One of the seven PPA+ campaign priorities is; to improve road safety, reduce the severity, and number of traffic collisions.

5. Civil Enforcement Officers

5.1 Effective parking management relies on Local Authority Civil Enforcement Officers (or parking attendants) who are responsible for:

- 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, particularly vulnerable groups
- enabling servicing and deliveries to take place in high streets

All of these actions reduce both congestion and dangerous parking, as parking takes management. Effective parking management keeps roads safe for road users, pedestrians and cyclists and we call on the government to support our Halt the Hate campaign (#HaltTheHate) so that CEOs are able to do their job without fear of physical abuse or verbal harassment. The job of a CEO is often difficult for the same reason that many jobs in the public sector are currently, because of physical and verbal abuse directed at them. Doctors and nurses in hospitals, bus drivers, ambulance paramedics are subject to it too and this stands in the way of them doing their job to the best of their ability. We urge the government and encourage political leaders and people of influence to support CEOs to do their job and support our campaign to Halt the Hate of CEOs. This month a [CEO in Birmingham was physically assaulted](#) for doing their job.

5.2 We recommend increasing the deterrent by introducing tougher sentencing for those convicted of assaulting a CEO.

6. Nuisance motorists

6.1 Ground breaking research being done by ourselves and one of our members, Penham Excel reveals a growing number of drivers are regularly and persistently avoiding paying Penalty Charge Notices (PCNs) from local authorities. If a vehicle owner has three or more PCNs in the last 12 months the DfT describes them as a persistent evader. At first it looked like the key insight from this research would be that local authorities are estimated to be owed over £500m (see our [Politics First article on persistent evaders](#) highlighting this, December 2018, p16 & 17) but in fact a far bigger concern is road safety. As this research also revealed that 40 percent of vehicles with three or more unpaid penalty charge notices were identified to be untaxed or uninsured vehicles or both. Often the vehicle is not registered with the DVLA at all and does not have road tax. Vehicle cloning also appears to be on the increase. Every car that does not have an MOT makes our roads unsafe for other motorists and pedestrians alike. Our member, Penham Excel welcome members of Transport Select Committee to observe them on a research patrol (in a surveillance car mounted with specialist cameras and detection software) at a place that suits them, for example the constituency. The editor of our trade magazine did just this in September 2018 and wrote this article called [Invisible Motorists in Parking News](#).

6.2 We assume people have learnt over time through experience, that local authorities and their enforcement agents can only act against a persistent evader if a PCN is physically stuck to their windscreen. In addition, a local authority can only claim the cost of that singular PCN and any charge for impounding it.

6.3 We published the [research evidence of persistent evaders](#) prior to a high-level Westminster roundtable we held on this topic in December 2018; local authorities, consultants, data analysts, government officials and MPs attended. One outcome has been joint-working with the National Roads Police Intelligence Forum and others, to do more research and we now call on the government to review the existing legislative powers outside of London to help tackle this issue and to help make our streets safer.

7. The TRO (Traffic Regulation Order) Project

7.1 The BPA is part of the TRO Discovery Project, a ground breaking project and unique collaboration between ourselves, the Department for Transport and [GeoPlace](#), to help local authorities make their TROs fully digital and machine readable.

7.2 Currently the way TROs are made and stored means connected and automated vehicles cannot read them and so this project aims for them to be machine readable by navigation systems. This will allow for example, road closures, speeding restrictions, one-way signs to be 'read'; instructions to motorists that make roads safer. The quicker this is achieved the safer our roads will become potentially. We recommend the government continue to support this important project to help local authorities to transform TROs so they can manage traffic and by extension road safety more effectively. This will enable connected and automated vehicles (CAVs and AVs) to navigate roads and kerbsides.

8. Parking outside schools

8.1 We recommend improving the management of parking outside schools, including school keep clear zones where children are particularly vulnerable and research the success of implementing so-called 'Bobby Zones' as in Manchester and similar area wide traffic management schemes during school hours.

In Summary

We work closely with government, especially the Department for Transport and the Ministry of Housing, Communities and Local Government, as well as recently, the Department of Food and Rural Affairs and the Law Commission, to develop parking policy and traffic management. We are happy to assist you with any further information in relation to this very important area of public policy.

Please do not hesitate to contact my colleague **Sarah Greenslade** by emailing consultations@britishparking.co.uk or calling **01444 447 300** if you need more information.

Yours faithfully



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