

BRITISH PARKING ASSOCIATION

DRIVING ISSUES, RAISING STANDARDS



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Emailed to: consultation@ccav.gov.uk

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Dear Mr MacHugh

Driverless vehicles: connected and autonomous technologies

The British Parking Association (BPA) welcomes your inquiry regarding connected and autonomous technologies. As the largest professional parking association in Europe we represent around 690 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 have 250 local authorities amongst our members.

For more information about the BPA please see the [endnote](#).

Accessibility continues to underpin economic regeneration, as shown in the BPA's [Master Plan for Parking](#). Our response provides proposals on how encouraging innovation and investment, and the fair and effective use of technology will improve the delivery and management of parking services for the benefit of all.

Parking must be remembered in technology. Technology is revolutionising the way people travel, and we want to drive innovation, investment and social responsibility in the parking profession. Parking policy has a major influence on people's travel decisions and therefore on how people move and become mobile. 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.

Remote Control Parking

The BPA is particularly interested in the section of the consultation on remote control parking. We want to ensure the safety of drivers using these systems and that of the road users surrounding them.

With the vehicle programmed to carry out a minimum risk manoeuvre such as pulling over to a safe parking place, if the driver is no longer in control, then the vehicle must be able to identify a safe parking place and understand parking terms and conditions.

It is essential that the regulatory framework clearly defines a position of control to ensure the understanding of the driver and clear enforcement of this.

The government needs to take into consideration that this regulatory framework may affect the altering of car park structures to ensure they cater for these needs; the cost of which may be vast and cannot be undertaken by car park operators immediately.

As the driver will need to get out of the vehicle and, using a mobile device command it to automatically drive itself into, or out of, a parking space the car park structure may need to be altered to provide a place for the driver to stand.

It is essential to ensure that the technology does not impair things rather than improve things. For example good parking management is vital to ensure that parking facilities remain accessible and provide access to town and city centres. This technology has the potential to cause congestion in the car park, either by many drivers standing and operating their remote controls, or by cars operating at very low speed and stopping when they identify hazards.

To inform our response to this consultation we have consulted with members of the BPA.

Some of the feedback we have received has suggested this proposal is limited in its scope and suggests the government should think bigger and with a wider vision on other technology. It is worth noting that this may be old technology by the time the UK's regulatory framework to support remote control parking has been agreed, and the rest of the world may have moved on.

Our response to your specific questions is provided in the [Appendix](#).

Camera technology in parking

As the Department for Transport and Department for Business Innovation and Skills are looking at the UK's regulatory framework to support remote control parking, we suggest they alter regulations to support other technology in parking too.

Much of the work we have done demonstrates that there is a need for local authorities and private operators managing parking to be flexible in how they manage their car parks where they make a charge. 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 and the increasing use in the private sector of 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 principle as applies to London's 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.

Surveillance cameras play an important role in the management and use of parking facilities. We set out in our [Master Plan](#) that it is important that the use of cameras and surveillance technologies is fair and responsible, in accordance with Data Protection rules, and providing benefits to operators and motorists, with protocols in place to identify unfair or inappropriate enforcement activity.

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.

Safeguards need to be put in place to ensure such technology is not used simply for enforcement but as much technology is readily used in private car parks we believe local authorities should be able to use it too.

Research into technology and innovation in parking

The BPA 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 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 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, 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.

Taking action 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 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 Government's National Innovation Plan in order 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.

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.

With the majority of trips starting or ending with parking, parking must be at the heart of future mobility discussions as we prepare for a future increasingly dependent and driven by technology.

The type of technology to utilise and how the public, businesses, and local government access the data will significantly alter the provision of parking as we know it. What it will look like ultimately depend on everyone working together to provide an exceptional experience for the end user.

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 intelligent mobility is realised throughout our membership.

The BPA is always very willing to work with government to develop car parking policy and the Association is at your disposal to assist with any further information, advice or support in relation to this very important area of public policy.

We hope you will find these comments of interest. The BPA is ready to work with the government to achieve these desired aims and we look forward to discussing with you how we can assist in taking these issues forward.

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

Yours sincerely



Patrick Troy
Chief Executive

Appendix

BPA response to specific consultation questions

I am pleased to set out below our response to your specific questions made on behalf of the membership of the BPA.

Do you agree with the proposed approach to enable remote control parking by clarifying:

Regulation 104 (the driver should be in a position to be able to control the vehicle)?

Yes. Clarification is necessary to ensure the driver understands when he is and is not in a position of control, for example the standing distance from the vehicle.

Regulation 107 (switching off the engine when the vehicle is not attended)?

Yes, safety is paramount. If the driver is not in a position of control then the vehicle's engine should be switched off.

Regulation 110 (not using hand-held mobile phones while driving)?

Yes. Clarification is necessary to ensure the driver is not seated within the vehicle.

Why?

We agree with the above proposals; however the enforcement of the regulations is crucial to ensure everyone's safety.

Endnote

About the British Parking Association:

The British Parking Association (BPA) is the largest professional association in Europe, representing around 690 organisations 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 railways 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](#).