

BRITISH PARKING ASSOCIATION

DRIVING ISSUES, RAISING STANDARDS



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Committee Chair Maria Miller
Women and Equalities Committee
House of Commons
London
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Dear Ms Miller

Disability and the built environment

The British Parking Association (BPA) welcomes your inquiry regarding disability and the built environment. As the largest professional parking 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.

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](#). The BPA has produced a Master Plan for Parking for the UK which sets out our agenda to 'Enable a Mobile Society' by setting standards, promoting professionalism, advocating sustainability, challenging perceptions and encouraging innovation, we aim to achieve the best outcome for the motorist and the wider parking profession.

Parking services impact on everyone, for people who travel about, regardless of their mode of transport, few things impact on people's daily lives more so than parking services. Even pedestrians can be affected by poorly parked vehicles, obstruction of footways, dropped kerbs road crossings and junctions and parking at bus stops can impede access to public transport services.

Improving parking services and ensuring equality in parking is ingrained in the BPA and the entire work of the Association. We have an appointed 'Equalities Champion' for the parking community, our Director of Policy and Public Affairs, Kelvin Reynolds. Mr Reynolds is not only ensuring we consider equality in everything we do just as an organisation but also across the entire parking community. At head office and in our governance we are doing it all

the time. Every report, to our BPA Board and Service Boards includes an equality statement, which causes us to think about the impact of what we are discussing in terms of equality.

We advocate best practice and encourage our members and staff to ensure equality and inclusivity across the profession. Our response is detailed below and divided into the various areas in which we work.

The Equalities Acts and related Regulations

A disability can mean anything from hearing or sight impediment to being in a wheelchair. All of these customer requirements need to be met in parking facilities.

The BPA works hard to raise awareness of disabilities across the parking community to improve services and accessibility. This includes encouraging our members to produce parking equipment and services that meets the needs of people with disabilities.

We collaborate with DMUK on a whole range of activities to raise awareness of disabled access, this includes being a Specialist Advisor to the DMUK Magazine and jointly participating in the Joint Committee on Mobility for Disabled People to influence and inform government of the accessibility disabled motorists require.

This includes educating operators in what 'reasonable adjustments' means when accommodating the needs of people with disabilities. Fundamentally these adjustments can also benefit the elderly, people with baby buggies, and others.

We believe people drawing up specifications for equipment or services need to be more involved in deciding what is required, what it needs to do and what needs should be catered for and then seek appropriate design and provision accordingly. Improving access as much as possible, not just the minimum amount. Then service specifications can be better written to ensure that the supplier understands what needs to be delivered.

Accreditations

Accrediting operators is a fundamental way in which the BPA work to raise standards in parking.

We would like to see Government support for the accreditations to ensure all parking operators work to raise the standards in their car parks and continue to meet customer needs, these include; Professionalism in Parking Accreditation or PiPAⁱ (especially in the healthcare sector), the Disabled Parking Accreditation and Park Mark.

The BPA is currently developing the Professionalism in Parking Accreditation for individuals and organisations working in the parking profession. With access and equalities in mind PiPA reflects universal principles and individual sector requirements.

Services should consistently meet customer requirements and quality should consistently be improved. By improving access and improving facilities the accreditation works to improve

the journey for all, it requires organisations and staff to understand the needs of every motorist.

The standards include enforcement of disabled bays and the monitoring of Blue Badge use to prevent misuse. Those misusing spaces are depriving spaces for those who actually need them. For disabled people, Blue Badges are a vital lifeline that help them get out and about to visit shops or family and friends, misuse of the badge is a criminal offence.

To improve parking for disabled people and reduce abuse of disabled spaces the [Disabled Parking Accreditation](#) (DPA)ⁱⁱ, a national accreditation scheme, was launched by Disabled Motoring UK (DMUK) and which the BPA now manages on their behalf.

Disabled motorists want to access car parking independently, and whilst increasing numbers of disabled people are now able to drive their own vehicles, being able to actually access a car park when they arrive at their destination is another matter entirely. The lack of step-free access of course is a prime concern, but other issues such as a lack of staff and general staff awareness can also create challenges.

This accreditation is often coupled with the Park Markⁱⁱⁱ, an accreditation aimed at reducing crime and the fear of crime in parking facilities.

By improving access and reducing crime in parking facilities the operators are improving their car parks for all users; ensuring services continue to meet the needs of every motorist.

Blue Badge Scheme

Inequality can be caused in the abuse, misuse and fraudulent use of Blue Badges. Continued misuse and abuse of the scheme means fewer spaces are available for genuine badge holders and brings the scheme itself in to disrepute.

We want to see changes that allow genuine Blue Badge holders an improved service, and provide local authorities the means to more effectively manage and enforce the scheme.

We participate in the Blue Badge Improvement Service Management Group. The BPA lobbied for and welcomed the introduction of the new enforcement powers across the UK and we now encourage greater use of these powers to more effectively manage and enforce the Blue Badge Scheme.

We have consulted with members of the BPA and those working in Blue Badge enforcement; they have strongly reiterated the need for strict controls to be in place to avoid misuse, including regular assessments of motorists with a Blue Badge to improve enforcement in cases of abuse and misuse of the Blue Badge Scheme.

Although the Blue Badge Scheme has no statutory value in off-street car parks, many operators allow badges and provide designated spaces in order to follow the Equalities Act. The badge is often accepted as proof of the motorist's eligibility to use these disabled spaces. We promote and encourage consistency in the way in which concessions for Blue Badge holders are applied and advertised.

We believe guidance on the designated provision of disabled bays should be included in the Blue Badge Scheme. A fundamental review of the current guidance, [Inclusive Mobility](#) published by the Department for Transport (DfT), is long overdue, many of the figures are inaccurate, in some places excessive encouraging provision and subsequent misuse of the designated bays.

The BPA, Disabled Motoring UK and BSCS (formerly British Council of Shopping Centres) undertook major research in partnership with DfT in 2009, which indicated that the 6% one size fits all approach leads to oversupply in some situations and undersupply in others. We are urging DfT to update their guidance as per the research.

Technology

Technology is an enabler of equality and improved access and services in parking. The use of ANPR in car parks in particular is a technology which enables the delivery of many new customer friendly systems and improves accessibility for the elderly and disabled motorists by enabling hands free entry and exit and the use of internet based pre-booking systems and parking accounts.

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 improve 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 this technology is readily available and used in private car parks we believe local authorities should be able to use it too.

Footway Parking

We believe that parking on and obstruction of the footway is wrong and should be prevented to assist pedestrians, disabled pedestrians, the elderly and people with baby buggies. Road safety is an important issue and one that affects many communities.

Obstruction of dropped kerbs, access ramps and other areas used by pedestrians cause equal if not more difficulty for these people. These are just some of the reasons why proper and effective management of footway parking is so essential.

The demand for parking, especially from residents living in properties where there was little demand for parking facilities when the housing accommodation was originally built, has begun to create problems in some areas.

In some narrow streets it is not unusual to see vehicles parked partly on the pavement. This then restricts the safe passage of pedestrians especially those in wheelchairs, with sight disabilities and those in charge of young children. Parking on the pavement can also cause damage to the footway, adding costs for local authorities in repair bills.

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. The BPA is a supporter, along with Living Streets, DMUK, and Guide Dogs UK, of a Private Members Bill intending to provide powers for local authorities to properly manage and regulate parking on the footway. We have supported the proposals for a new law since it was first proposed by Ross Finnie MSP in 2010; we are also supporting the Footway Parking Bill in Scotland.

We will continue to work with Guide Dogs UK, Disabled Motoring UK, Living Streets, and other organisations to promote the development of common standards in the management and enforcement of parking on footways and areas used by pedestrians across the UK.

Women in parking

Women are under-represented in the parking community and opportunities can be improved through investment in qualifications and learning opportunities.

The BPA has established a number of special interest groups to provide members with the opportunity to develop within and without their field of expertise. Members share best practice and further promote and develop their interests individually and their respective field.

We launched the *Women in Parking Group* in 2007 to encourage diversity within the workplace. The group developed ideas and projects to promote best practice to educate and break down barriers within organisations.

This debate is now ingrained within all of our membership and groups.

Conclusion

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.

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 would be delighted to give oral evidence of best practice in the parking community if it was helpful to the Committee and inquiry.

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

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 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](#).

Professionalism in Parking Accreditation (PiPA)

Initially, we have launched PiPA for the Healthcare and Higher Education parking sector and it is intended to drive standards higher in the hospital parking sector to encourage Health Trusts to provide an excellent service to their car park users. I enclose a PiPA [pack](#) which sets out some of the standards that we would now expect of any Trusts applying for PiPA.

The award comprises a single organisational audit, of both the internal and external practices, in two parts; Overarching, high-level principles applicable to all sectors (e.g. Healthcare) and innovative accreditation. The award will recognise achievement and boost reputation.

I am delighted that three Trusts have already been awarded PiPA and the first awards were presented at the House of Commons launch of the scheme at which MPs were present.

We worked closely with officials at the Department for Health during the development of PiPA, and in the revision of Parking Guidance issued by the Department in March 2015 to ensure that PiPA is directly relevant to the government's expectation of Trusts in relation to car parking and more generally in relation to the guidance given by the Department for Health to Trusts.

Two assessment standards organisations must prove they uphold to achieve PiPA; 'customer service and stakeholder relationships' and 'social responsibility and equality of service delivery' review the extent organisations uphold equality in the provision for employees and customers.

Organisations must describe their approach to equal opportunities, both in terms of employment to ensure inclusivity, and prevention of age, disability or gender discrimination, and in terms of service delivery.

We hope that PiPA will continue to gain traction within the Healthcare sector thus driving standards higher. Healthcare PiPA is a starting point for expanding PiPA across other car parking sectors; we are now adapting PiPA for Higher Education, and will be exploring other sectors such as Local Authorities.

ii Disabled Parking Accreditation (DPA)

In order to qualify for the scheme, car parks are rigorously assessed to examine the physical aspects of the car park and check that the right management practices are in place. The criteria set by DMUK requires car park owners/operators to meet a number of [criteria](#).

The DPA in improving access aims to assist those who often find it hard to locate appropriate and accessible parking in their towns, cities and at other locations such as hospitals. This includes the elderly, people with baby buggies and those with disabilities.

iii Park Mark Award

The BPA manages the Safer Parking Scheme and its registered trade mark Park Mark on behalf of the Association of Chief Police Officers CPI. The scheme is for public and private operators' car parks. 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.

During the accreditation process, police assessors recommend changes that are known to deter offenders, such as perimeter fencing, surveillance and good lighting. If incidents do occur, operators and assessors together identify the causes and take appropriate action to reduce or eliminate the risk of a recurrence.

Vehicle and vehicle related crime has been falling since its peak in the mid 1990s. The targeted approach that the Safer Parking Scheme employs ensures that incidents remain low to zero.