

The British Parking Association (BPA) welcomes your consultation regarding the Motoring Services Strategy. I am pleased to set out below the Association's response.

This is a response made on behalf of the membership of the BPA and we have therefore provided responses to those questions that we feel are relevant to the Association.

These views expressed below and further information can also be found in our Annual Master Plan for Parking 2012-13.

The plan to move a greater delivery of the services offered by these agencies online or by other digital means will help the BPA in our dealings with the respective agencies

Although we do not have direct dealings with the DSA or VOSA, as a DVLA Accredited Trade Association, the BPA has regular dealings with the DVLA on a daily basis. Through the course of providing parking enforcement and management services, our members regularly exchange vehicle keeper details. Sometimes our members use the Vehicle Certification agency.

The BPA therefore agrees with the vision for digital services outlined in the consultation and is confident that online data exchange will be very useful for the BPA and its members.

We believe proposals to reform VCA and create a more responsive organisation will assist and enable it to respond to emerging technologies in a more reactive way. Defining these organisations to deliver better services will create efficiencies and a less cumbersome and more streamlined service will be of benefit to all.

The BPA lobbies for an educational programme on parking through the DSA, and we believe that driver training and the Driving Test are perfect opportunities to provide information about how parking enforcement and legislation works. This is also an opportunity to educate young drivers about the BPA's Safer Parking Scheme, for example, and other relevant parking initiatives.

One of the BPA key objectives is to increase public confidence in parking and parking management through the setting and raising of standards across the sector.

This will include a public information campaign to inform motorists of parking law and best practice to improve parking behaviour and compliance. We are also aware of the need to enhance the parking sector's understanding of competing customers' needs to deliver better services to motorists. We would like to work with the DSA as it updates and publishes future editions of the Highway Code.

As stated in our Master Plan, **the BPA want to see the UK's town and city centres revitalised and the role of effective parking and traffic management in achieving this properly recognised.**

**This includes the need to allow local authorities to enforce moving traffic contraventions which will reduce congestion and accidents and improve accessibility.**

Proper and effective traffic management is absolutely essential; without this our high streets will become more congested and costs to local authorities will increase without significant economic benefits. Congestion is bad for the environment and also costly to business and commerce so Government is seeking to reinvigorate town centres. We will work with the Association of Town Centre Management and others to bring about a better understanding of the contribution that effective traffic and parking management can provide to town and city centres. Traffic authorities in England and Wales should be able to carry out enforcement of moving traffic contraventions as well as providing and controlling parking services.

Increasingly, products used in the provision of parking enforcement, such as ANPR camera technology, must meet a minimum set of regulatory, technical and safety requirements ensuring that the evidence is trustworthy and appropriate for the nature of the enforcement being undertaken. In practice this is likely to mean the use of 'Approved Devices' within the meaning of the Road Traffic Regulations Act 1984 and associated legislation. We want to see a reduction in red tape and believe that the VCA should approve a model certification for approved devices. We believe that The VCA, could help streamline the process of certification of approved devices. The BPA is lobbying for trusted third parties to play an integral role in identifying keepers thereby improving data accuracy of the keeper database. Our Master Plan objective states that:

**We want to see better enforcement of non-compliance with vehicle and driver registration laws, improvements in the accuracy of vehicle and keeper registers at the DVLA and access to EU keeper databases via the DVLA.**

The BPA works closely with the DVLA to ensure that motorists' data is properly safeguarded, and where data is released for parking enforcement purposes, that it is used appropriately and in accordance with the law. It is unfair on law abiding motorists that some people can avoid enforcement action by not complying with traffic and parking laws and by being 'invisible' or 'untraceable' because they fail to register themselves and/or their vehicles properly and in accordance with the law. Vehicles registered in EU countries should also be subject to the same laws so access to databases in other countries must be made available on a reciprocal basis. We also have some concerns that the DVLA should be more proportionate in its management of the BPA's Approved Operator Scheme. The BPA wishes to work with DVLA to co-operate on raising standards in the management of parking on private land for everyone's benefit, but what we do in this regard must be fair and reasonable to all. Additionally, we believe that the Vehicle Registration Act needs closer examination and improvement to ensure that agency staff are able to challenge clearly inaccurate information provide by vehicle registrants. For example, fictitious name are often used and the law currently requires these details to be entered into the databases which is absurd.

The closure of DVLA local offices will improve the efficiency of services but this should not compromise the ability for motorists to register their vehicles efficiently. However the move to the provision of online digital services may counter any negative effect that results because of this.

As you may know, the British Parking Association (BPA) is the largest professional association in Europe representing organisations in the parking and traffic management sector. 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.

Currently we have over 710 members, equally split between the public and private sectors. As the recognised authority within the parking profession, the BPA represents, promotes and influences the best interests of the parking and traffic management sectors throughout the UK and Europe. As well as this work, the BPA provides its members with a range of benefits aimed at helping the professional in their day to day work.

The BPA also manages initiatives for the sector including the Safer Parking Scheme (on behalf of the Associations of Chief Police Officers), the Approved Operator Scheme (for those managing and enforcing parking on private, unregulated land) and the Parking Forum.