



Department
for Transport

Government response to the 'Pavement parking: options for change' consultation



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Department for Transport
Great Minster House
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Ministerial Foreword

Pavement parking is an issue that resonates deeply with communities across our country. From bustling city centres to quiet residential streets, the impact is felt by many; particularly people living with sight-loss, mobility or sensory disabilities, older adults, parents with young children, and anyone who relies on safe, accessible pavements to move around independently.

I am grateful to all those—Members of Parliament, local councillors, advocacy groups, and members of the public—who have campaigned tirelessly to highlight the challenges posed by pavement parking. Your voices have been heard, and your experiences have shaped our understanding of the scale and importance of this issue.

I have heard first hand from individuals and communities who have been affected by this issue for far too long. Their stories were powerful and often deeply personal. They spoke not only of inconvenience, but of exclusion, of fear, and of the loss of confidence that comes when public spaces are no longer accessible. These voices have stayed with me in my role at the Department for Transport, and they have helped shape the approach we are now taking.

The Government is committed to building safer, more inclusive streets. This consultation on pavement parking provided invaluable insights, making clear that this is not a niche concern but a national one: pavement parking undermines safety and restricts mobility.

I know that many people have waited a long time for meaningful action. I understand the frustration, and I share it. But I also believe that when we tackle a problem as complex and widespread as pavement parking, we must do so with care. We needed to listen to campaigners, to local authorities, to those with lived experience and we needed to ensure that any solution would be fair, effective and enduring. That takes time, and I want to thank everyone who has remained engaged and committed throughout this process.

The Government is taking forward a new, devolved approach to pavement parking, reflecting our commitment to decisions being made closer to the communities they affect. Local leaders know their communities best, so they are in the strongest position to figure out how to meet local needs effectively. While the overarching objective to make pavements accessible and safe remains unchanged, rather than introducing a 'one size fits all' national prohibition which was one of the consultation options, we will enable local transport authorities to prohibit pavement parking in their areas at the next legislative opportunity. In Strategic Authority areas outside of London, the power would be vested in the Strategic Authority. In non-Strategic Authority areas, the power will vest in the highest tier of local government in the area, i.e. the unitary authority (which also includes Metropolitan District councils) or county councils. This will support more responsive and inclusive transport planning in the interests of local communities.

In the meantime, we will be enabling local authorities to enforce against unnecessary obstruction of the pavement. This provides a practical and proportionate solution, allowing

councils to act where pavement parking is observed by uniformed civil enforcement officers, while retaining local discretion and flexibility.

These are significant steps, which I am proud to have achieved. But they are also part of a broader journey towards streets which are safer, more inclusive, and more respectful of everyone who uses them. Tackling pavement parking is not just about enforcement; it's about changing attitudes, improving design and recognising that public space should serve the public fairly.

Thank you to everyone who has contributed to this work. Your insight, your persistence and your lived experience have been vital. I remain committed to working alongside you as we continue to build a transport system—and a society—that works for everyone.



Lilian Greenwood MP

Minister for Local Transport

Executive summary: Reforming Pavement Parking Policy in England

The government is committed to ensuring that the road network is safe and accessible for all users. As part of its wider missions to 'Take Back Our Streets' and 'Break Down Barriers to Opportunity', the Department for Transport ('the Department') is supporting greener, more active and sustainable modes of transport, including walking, cycling, public transport and electric vehicles. Reforming the way pavement parking is managed is a key part of this agenda.

Between 31 August and 22 November 2020, the Department consulted on measures to assist local authorities in tackling pavement parking in England (excluding London, where it is already prohibited). The consultation received over 15,000 responses, with a clear majority of individuals (81%) and organisations (96%) reporting pavement parking as a problem in their area. Notably, 41% of individuals said they would leave home more often if pavement parking were addressed.

The consultation set out three options:

Option 1: Improve the existing Traffic Regulation Order (TRO) process.

Option 2: Enable local authorities to enforce against 'unnecessary obstruction' of the pavement.

Option 3: Introduce a national prohibition on pavement parking, with local exemptions.

Option 3 received the most support from individual and organisational respondents to the consultation (71% and 54%), while local authority respondents preferred Option 2 (56%), though this was largely due to concerns about costs. Only 5% of respondents proposed alternative approaches, most of which were variations or combinations of the three options.

It is worth noting that much has changed since the government's consultation on pavement parking was undertaken in 2020. The policy landscape, local authority powers and public attitudes have all evolved significantly. The consultation responses have provided clear evidence of stakeholder views on the issue of pavement parking and the overarching objective to make pavements accessible and safe remains unchanged. Taking into account the need to enable locally appropriate solutions to address pavement parking, and the views from the consultation, we have developed approaches that are better aligned to achieve the policy objectives underpinning Option 3.

The Department is already progressing reforms to the TRO process (Option 1), including digitalisation through the Automated Vehicles Act 2024. However, TROs are not a practical tool for widespread enforcement due to cost, complexity and sign clutter.

Option 2 offers a quicker and less costly route via secondary legislation, allowing targeted enforcement. However, concerns were raised about inconsistent enforcement and ambiguity around what constitutes 'unnecessary obstruction'.

Option 3 could provide a national standard, aiding compliance and enforcement. However, it would require primary legislation, be more costly to implement, and was seen by some as inflexible.

Respondents overwhelmingly believed that both Options 2 and 3 would have a positive or neutral impact on people with protected characteristics, particularly those related to age, disability and pregnancy/maternity.

While the overarching objective to make pavements accessible and safe remains unchanged, the government is pursuing a different approach to a national ban to create powers to enable local transport authorities to prohibit pavement parking in their areas. This will be exercised by the Strategic Authority. In non-Strategic Authority areas, the power will vest in the highest tier of local government in the area, i.e. the unitary authority (which also include metropolitan district councils) or county councils. In parallel, we will proceed with Option 2 via secondary legislation, enabling local authorities with designated civil enforcement powers to enforce against unnecessary obstruction of the pavement.

Background

In this section, we summarise the response received to each of the questions in the consultation titled 'Pavement Parking: Options for Change'.

This government response outlines the consultation proposals, provides a high-level summary of stakeholder responses to the consultation question and highlights some of the key comments from the respondents on the proposed policy options.

Pavement parking carries inherent dangers for all pedestrians. It may force people onto the carriageway and into the flow of traffic and damage pavements and verges, resulting in trip hazards. This is particularly difficult for people with sight or mobility impairments, wheelchair users and those using prams or buggies.

However, many towns and cities were not designed to accommodate today's high traffic levels and at some locations the pavement may be the only place to park without obstructing the carriageway.

Currently, local authorities in England (outside London) can enforce against pavement parking where:

- vehicles are parked in contravention of existing waiting restrictions (for example yellow lines, which also apply to the pavement and verge);
- a designated prohibition has been implemented through a TRO and prescribed, or authorised, traffic signs and bay markings; or
- the vehicle parked is a 'heavy commercial vehicle' with an operating weight of over 7.5 tonnes.

Despite these tools, 92% of local authorities, 80% of commercial businesses, 96% of other organisations and 82% of individuals that responded to the consultation said that pavement parking was a problem in their area. Furthermore, 41% of individuals said they would leave home more often if there was no pavement parking.

The consultation was undertaken to inform policy decisions and does not represent a voting exercise to determine the most popular option; none of the original three consultation options were mutually exclusive.

'Pavement' in this document means the part of a highway which shares its border with the carriageway ('road') on which there is a public right of way on foot. This is the more commonly used term for that part of the road referred to in legislation as the 'footway.' This is distinct from a 'footpath', which does not border a road.

Next steps

Delivering a permanent, devolved solution on pavement parking requires primary legislation followed by the development of a regulatory framework governing how devolved solutions on pavement parking are to be implemented. We will look to legislate on this at the next available opportunity.

Our next steps will focus on delivering swift and precise work to develop powers which will enable local transport authorities to prohibit pavement parking in their areas. This will support more responsive and inclusive transport planning in the interests of local communities. Rather than imposing top-down solutions which fail to account for the needs of local communities, we will listen to local government at all levels, ensuring local voices lead the conversation.

Together, we will bring forward a regulatory framework which is national in scope and local in implementation. It will ensure local authorities can tailor pavement parking solutions which work for their communities. We will work with local government to ensure the framework considers fairly their range of related responsibilities including accessibility, disabled parking provision, and the rollout of electric vehicle charging infrastructure. As far as possible, we will ensure local and regional governments control the scope of their policies, including area-wide prohibitions across local transport authorities where they choose to do so subject to necessary exemptions. We are committed to delivering a genuinely devolved and streamlined framework, ensuring that the exercise of these powers will not require application to the Secretary of State. This represents an ambitious step towards empowering local authorities and avoiding unnecessary bureaucracy.

The Department has commissioned new research to strengthen the evidence base on pavement parking. The research has already begun and will involve a physical measure of the extent of pavement parking and questionnaires to gather insights into its impact across a range of local authorities. This work supports our commitment to evidence-based policy and future evaluation. Findings will be published as early as possible, and no later than 12 weeks after agreeing the final outputs, in line with the government's Social Research Publication Protocol.

We acknowledge that pavement parking is a problem today and local authorities want to address this for their communities. For this reason, we will proceed with Option 2, providing local authorities with the power to enforce against unnecessary obstruction of the pavement. This civil enforcement power will be delivered in due course through secondary legislation and will not require additional traffic signage. It will allow councils to take action against the most egregious examples of obstructive pavement parking in the interim. This power will sit alongside existing TRO powers, enabling councils to enforce pavement parking restrictions both where TROs are in place and in other areas where obstruction occurs. The Department will issue Statutory Guidance to support local authorities in using this power.

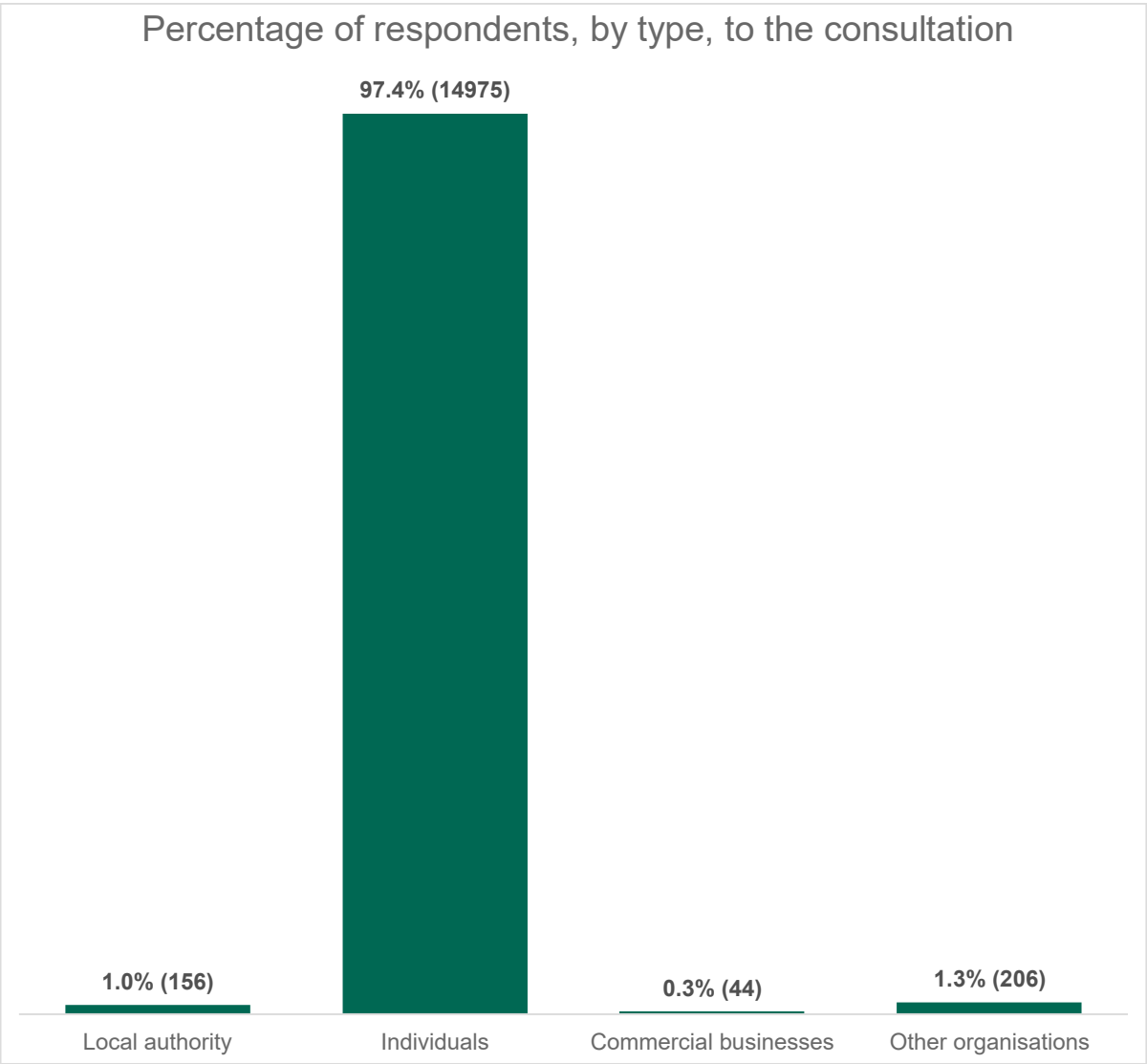
Taken together, these steps will give local authorities the powers they need to address pavement parking effectively, while ensuring consistency, clarity, and fairness for all road users.

Summary of respondents

The Department received a total of 15,381 responses from the public, local authorities, commercial businesses and other organisations. The summary contained in this document describes key themes set out in responses. For the sake of brevity, it does not repeat the full details contained in every response.

The following graph provides a breakdown of those who responded.

Chart 1: Breakdown of responses



The summary below sets out the response to questions asked of individuals and organisations and some specific questions asked of commercial businesses. We also

asked local authorities a series of additional questions to gather data to help us in developing an options assessment. They do not form part of this response.

When we use the following terms in this document, this is what we mean by them.

> 80% of responses to the question	vast majority;
60 - 79%	majority;
30 - 59%	many;
10 - 29%	substantial minority;
< 10%	small minority.

Furthermore, where we might say “Local authorities said...”, for example, we do not mean all local authorities, we are merely distinguishing that it was said by some local authorities as opposed to commercial businesses, other organisations or individuals. Similarly, when stating “commercial businesses said...” or “other organisations said...” we do not mean all of them.

Responses to questions

Do organisations think vehicles being parked on the pavement is a problem in your area?

Table 1: summary of responses to question - Do organisations think vehicles being parked on the pavement is a problem in their area?

	Yes	%	No	%	Don't know	%	Response Total
Local authorities	142	92	10	6	3	2	155
Commercial businesses	35	80	8	18	1	2	44
Other organisations	193	96	8	4	0	0	201

As an individual do you think vehicles being parked on the pavement is a problem in your area?

Table 2: summary of responses to question - As an individual do you think vehicles being parked on the pavement is a problem in your area?

	Yes	%	No	%	Don't know	%	Response Total
Individuals	12201	83	2593	17	181	1	14975

Pavement parking causes you problems because:

Table 3: summary of responses to question - Pavement parking causes you problems because:

You have a sight impairment?	You have a mobility impairment?	You use a buggy or pram to transport children?	Of another issue?	Response Total
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Individuals	596	1764	2394	8828	11821
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Although the above table shows that the total of individual responses received was 11,821, some individuals indicated that pavement parking caused them more than one problem. The total number of problems recorded was 13,582.

Would you leave home more often if there was no pavement parking?

Table 4: summary of responses to question - Would you leave home more often if there was no pavement parking?

	Yes	%	No	%	Don't know	%	Response Total
Individuals	4918	41	4930	41	2285	18	12133

Does your commercial business routinely make deliveries as part of its business?

Table 5: summary of responses to question - Does your commercial business routinely make deliveries as part of its business?

	Yes	%	No	%	Response Total
Commercial businesses	14	32	30	68	44

Do you agree that 20 minutes of pavement parking would be adequate for a delivery?

Table 6: summary of responses to question - Do you agree that 20 minutes of pavement parking would be adequate for a delivery?

	Yes	%	No	%	Response Total
Commercial businesses	9	64	5	36	14

Why not?

Summary of responses

Some **commercial businesses** expressed concerns that the average time spent on site is longer than 20 minutes. The point was made that there are few deliveries that can be unloaded within the suggested 20-minute time limit when the load must be carried up a staircase. It was also suggested that small businesses may not have adequate delivery systems in place, leading to frequent delays.

Placing an arbitrary time limit was not considered helpful, rather, the time allowed for loading should be sufficient for delivery/collection activity to be efficiently and safely undertaken. Forcing deliveries to be rushed could pose a health and safety risk to drivers and pedestrians. It could also lead to increased vehicle movements as deliveries may be split into smaller loads to enable them to be undertaken within the specified time limit. This would add costs to logistics companies, it would also increase congestion and emissions. Many delivery drivers now have to work until 67 or older and slow down with age.

Of all the daily deliveries that you may make, what percentage do you think will take longer than 20 minutes each to be completed?

Table 7: summary of responses to question - Of all the daily deliveries that you may make, what percentage do you think will take longer than 20 minutes each to be completed?

	0%	1 to 10 %	11 to 20 %	21 to 30%	31 to 40 %	41 to 50 %	51 to 60%	61 to 70%	71 to 80%	81 to 90 %	91 to 100 %	Response Total
Commercial businesses	1 (20%)			1 (20%)			1 (20%)	1 (20%)	1 (20%)			5 (100%)

In your opinion, what types of delivery that you make would require greater than 20 minutes?

Summary of responses

Commercial businesses stated that there were several factors that could lead to a delivery requiring more than 20 minutes. These include irregular deliveries with unknown loading and unloading procedures which may not be straight forward, delivery and collection of multiple goods, deliveries to and from small businesses. Specific examples of deliveries requiring longer than 20 minutes included: grocery deliveries (because many stores do not have dedicated goods-in entrances and have products delivered through the

front of the store or through access routes that are not purpose-built), beer deliveries to pubs, home/office removals and delivery of heavy goods that must be carried up a staircase.

Your preferred option for tackling pavement parking is:

Table 8: summary of responses to question - Your preferred option for tackling pavement parking is:

	1, simplification of TRO's but no additional action?	2, in addition to Option 1 allow councils to enforce against 'unnecessary obstruction of the pavement?'	3, in addition to Option 1 introducing an England-wide pavement parking prohibition?	an alternative option?	Response Total
Individuals	1233 (8%)	2351 (16%)	10624 (71%)	767 (5%)	14975
Local authorities	7 (4%)	87 (56%)	48 (31%)	14 (9%)	156
Commercial businesses	3 (7%)	10 (23%)	25 (57%)	6 (13%)	44
Other organisations	7 (3%)	37 (18%)	145 (70%)	17 (8%)	206

Describe your alternative approach

Summary of responses

Individuals

A small minority of responses supported Option 1 with changes, such as delivering Option 1 alongside alternative parking provisions.

A small minority of responses supported Option 2 with some modifications. The most common suggestion for a change to Option 2 was to define an 'unnecessary obstruction' as not leaving a reasonable gap, which was mentioned in many of these responses. Other suggestions, each mentioned in a small minority of the responses suggesting changes to Option 2 included:

- include residents in decision making around exemptions;
- local authorities should not have the power to decide on exemptions;

- no 20-minute loading/unloading exemption;
- an increased list of exemptions, including for those parking on the pavement in order to leave the road clear, those with disabilities, and those who stay close to their vehicle;
- use pavement markings to ensure pedestrians can pass parked cars;
- ensure there is a complaints procedure in place;
- donate revenue from fines to charity;
- also enforce non-vehicular obstructions;
- exemptions for all residential areas;
- ensure there is clear signage in restricted areas; and
- an appeals process with clear guidelines.

When asked to describe their alternative approach, a substantial minority of responses included a suggestion of some version of Option 3, with modifications. The vast majority of these involved changes to the exemptions set out in the consultation document whilst a substantial minority of responses suggested changes to how Option 3 would be delivered and which roads should be included in the prohibition.

Suggested changes to exemptions included:

- local authorities should not have the power to decide on exemptions;
- exemptions for residential streets;
- support for a rural exemption;
- exemptions for business and non-business drop-offs;
- 20-minute exemptions for Blue Badge holders;
- a 20-minute exemption for all vehicles;
- extending the 20-minute exemption for loading/unloading to 30 minutes;
- no 20-minute loading/unloading exemption; and
- limiting loading/unloading to certain times of day.

Suggested changes to delivery of Option 3 included:

- providing alternative parking provisions, including for business;
- allowing pavement parking on one side of the road;
- allowing citizen enforcement;
- increasing the number of dropped kerbs to improve pedestrian access;
- broadening Option 3 to include other obstructions of the pavement such as wheelie bins;
- ensuring there is a complaints procedure in place;
- prohibiting parking on cycle lanes;
- allowing parking on kerbs only (no additional detail provided);
- ensuring bollards are placed between the pavement and road;
- deciding roads included in the prohibition following consultation with residents;
- broadening to include all private and public roads; and
- donating revenue from fines to charities.

Alternative measures to the proposed options were also suggested. The most frequently suggested alternative measure, suggested in a substantial minority of responses, was the introduction of new parking. The vast majority of these responses were advocating increased off-road residential parking at new and existing homes, including through

distributing grants. Many advocated new parking generally, including through introducing underground car parks. A substantial minority of responses also suggested introducing more public parking, rather than private, and ensuring it is affordable.

Another group of alternative suggestions related to road infrastructure changes. A substantial minority of the responses suggested some kind of road infrastructure change in place of the proposed options. Many of these responses suggested road widening. There were several other road infrastructure changes suggested, each suggested in a small minority of responses, including:

- improvements to road markings and signage;
- introducing one-way systems on narrow roads;
- introducing pedestrian priority on narrow roads;
- no additional widening of pavements;
- providing cycle lanes which cannot be parked across;
- increasing the frequency of dropped kerbs;
- reducing speed limits on narrow roads;
- introducing traffic calming measures;
- removing low traffic neighbourhoods;
- removing cycle lanes; and
- improving pedestrian crossings.

Alternative measures relating to better use of existing parking were also proposed in a small minority of responses. The vast majority of these responses related to a change in the layout of parking, including only allowing parking on one side of the street. A substantial minority of responses suggested improved use of residential off-road parking through:

- ensuring driveways are used wherever possible;
- preventing the removal of existing residential off-road parking, for example through converting garages; and
- implementing designated business vehicle parking outside of residential areas.

Organisations

Some **Local authorities** suggested adopting all three options in a phased approach. The phased approach would initially allow targeted enforcement of known hotspots (Option 2) whilst planning the rollout of a national prohibition (Option 3) over the longer term. Councils generally desired the flexibility to set local rules and exemptions.

Some thought Option 2 should include obstructive parking on the carriageway - for instance near junctions – or dangerous parking.

Others said pavement parking should be prevented where subterranean services may be damaged by exemptions from a prohibition.

Some thought the loading exemption should be 10 minutes rather than 20, in line with grace periods.

One council said that instead of pursuing the proposed civil options, to keep the criminal offences and improve the enforcement of them.

Some **commercial businesses** had concerns about a blanket prohibition on all roads and stated that local authorities should instead only be given advice on how to help them manage their road network.

Some thought that there needed to be a focus on reducing the size of vehicles or having vehicle size limits in areas where the problems are greatest i.e. people should not live in a waterfront flat if they have two cars and a Transit van. Numbers of vehicles per household was seen as a huge problem, compounded by poor public transport (especially in rural areas).

Other views included ensuring that local authorities should not profit from fines and placing the burden of proof on the enforcement agency. Drivers should be able to leave a visible phone number that Civil Enforcement Officers (CEOs) must call before taking any action.

The response from **other organisations** was similar to that of local authorities, in that some thought all three options should be employed. The TRO improvements (Option 1) should happen. It was suggested that Option 2 be introduced immediately, in parallel. Some said Option 2 should then automatically be replaced by Option 3 after the necessary preparatory work for Option 3 had taken place. Starting with Option 2 would see some immediate action against pavement parking whilst allowing local authorities the time to review their road networks and identify areas where Option 3 may not be appropriate. Others said the success of Option 2 should be measured and Option 3 only adopted if Option 2 proved ineffective.

Some said that Option 2 should be expanded to allow civil enforcement of obstruction of the highway as well as the pavement; including roads, verges and bridleways. In addition, decriminalising or allowing criminal and civil enforcement of 'driving on footways'.

Other suggestions included: addressing 'overhanging' (where the front or rear of a vehicle, which may be parked on land owned by a householder or business with perhaps none of its wheels being on the pavement, nevertheless projects over the pavement in such a way that it obstructs pedestrians); introducing Option 3 but with emphasis on promoting active travel and affordable public transport; giving Police Community Support Officers extra powers to issue penalties in conjunction with option 1; implementing a 15-mph speed limit on roads identified for pavement parking unless the restrictions applied are such as to prevent obstruction of the footway (for example where parking is permitted on only part of a wide pavement); and councils should by default be required to introduce a pavement and verge parking prohibition on all streets with a 30mph or lower speed limit.

In addition to the chosen option, it was recommended that government at both national and local level puts effort into publicising the antisocial and dangerous consequences of pavement parking.

Some thought the exception for 20 minutes loading would be abused and present some ambiguity which should be closed down. Unloading directly from a vehicle into a property frontage is not a right and there are various means available and in use in some places to manage the last 50 to 200 metres (or even longer) from a designated waiting place e.g. handcarts, pallet trucks, small electric vehicles, cargo bikes, etc.

Another suggested the government go further and introduce a national prohibition with reduced discretion and exemptions.

It was further proposed that a revised Option 3 should allow enforcement by whatever appropriate technologies are available at the time, including devices onboard vehicles and related software e.g. satellite position, cameras including Automatic Number Plate Recognition (ANPR), and third-party reporting of transgressions.

More widely, it was suggested that planning law should ensure at inception that all premises have loading facilities that do not cause obstruction of the footway, cycleway, or indeed of the carriageway. No developments should be permitted that compromise any part of the highway. However, if such facilities are not available then operators should be expected to retrofit them, to use appropriate means to cover the last few metres to the premises, or they should be expected to obstruct the carriageway rather than the footway or cycleway. This requirement would put disabled people with mobility or sensory impairments, pedestrians and then cyclists towards the top of the hierarchy. This requirement could also expedite alternative arrangements for loading or even re-location of businesses unable or unwilling to operate within such requirements, and also to minimise the time of any obstruction.

How would you define an 'unnecessary obstruction of the pavement'?

Summary of responses

Individuals

Of the responses received, the majority suggested that an unnecessary obstruction should be defined by the type of obstruction.

Most of these people felt the defined obstruction should specifically refer to a vehicular obstruction. Examples of vehicle obstruction included:

- wheels on pavement or half the car on the pavement;
- lorries/vans/other large vehicles (only) on pavement, which includes delivery drivers;
- on pavements narrower than the width of a car; and
- business vehicles on pavements longer than 20 minutes.

Many suggested that an unnecessary obstruction refers to the reduction of pavement width. Examples of this included reference to:

- reducing pavement width with reference to wheelchairs, mobility scooters and push chairs;
- full blockage of pavement width;
- less than 70cm available to less than 3m available; and
- more than 10% blocked to more than 80% blocked.

A substantial minority suggested that an unnecessary obstruction of a pavement would include non-vehicle obstructions, such as a wheelie bin on the pavement.

A small minority suggested that any vehicle that parks on pavements near certain infrastructure or buildings should be deemed an unnecessary obstruction. Examples included:

- close proximity to junctions/driveways/dropped kerbs/blind spots/double yellow lines/bus bays;
- close proximity to a dwelling/business property;
- close proximity to a verge/greenery;
- close proximity to a cycle lane;
- close proximity to a school; and
- close proximity to a hospital.

A small minority suggested that cycling on the pavement should be included in the definition, while a further small minority suggested an obstruction could only be considered unnecessary when on specific roads, including on cul-de-sacs.

Of the responses received a substantial minority suggested that the definition of an unnecessary pavement obstruction should relate to the necessity of the parking.

The majority of these people suggested that an unnecessary obstruction of the pavement should include any pavement parking that takes place when alternative (non-pavement) parking is available to be used.

A substantial minority highlighted specific circumstances when pavement parking is an unnecessary obstruction. Examples include when pavement parking is:

- non-essential (i.e. stopping to visit a friend/shop);
- not safety critical;
- left unattended; and
- a commercial vehicle.

A further small minority suggested that unnecessary obstructions should relate to the amount of time a vehicle is parking on the pavement and/or causing an obstruction. Examples included parking on the pavement for:

- more than a few minutes;
- 24 hours or more (including overnight parking); and
- an extended period of time.

Of the responses received another substantial minority suggested an unnecessary obstruction of the pavement definition should refer to the impact. Of these people, the vast majority thought that an unnecessary obstruction should relate to how pedestrians are impacted. Impacts relating to pedestrians included:

- being made to walk on the road;
- vulnerable populations specifically being impacted (including individuals that are elderly; have a disability; or the young); and

- line of sight being blocked.

A small minority expressed they were 'not sure', around half of which had no other comment while others suggested that defining an unnecessary obstruction was too difficult.

Organisations

It was generally recognised by **all types of organisation** that providing a definitive definition for 'unnecessary obstruction' in law would be difficult to achieve as it was partially dependent on the immediate circumstances - time of day, amount of traffic, etc. Nevertheless, respondents stated that a clear definition would be required to avoid confusion to road users and CEOs. Existing case law regarding the definition of 'obstruction' should be examined. We should not assume that there is a 'right' to park on the pavement or at any point on a road.

Some said that any vehicle parked wholly on the pavement is unacceptable in all circumstances, regardless of the space left for pedestrians. Some said if the space left for pedestrians prevented the safe and free movement of pedestrians, or a wheelchair, people using walking aids, wheeling cycles or pushing double buggies, it should be defined as an unnecessary obstruction. Alternative definitions given included: where a vehicle could park on the road without obstructing access (one specified that vehicles of 2.6m width should be able to pass on the road); any stationary vehicle with 2 or more wheels on the pavement; any encroachment by a vehicle on the pavement except during an emergency; non-commercial vehicles parking on the pavement for any length of time; parking on pavements to pop into shops; all overnight parked vehicles; parked on the pavement not loading where the road is wide enough for a fire engine to easily pass the vehicle were it fully on the road; where it is for social, domestic or pleasure reasons and alternative parking is available; where parking on the road would still allow vehicles to pass in at least one direction at a time; any obstruction that the motorist could not justify as necessary; or leaving a vehicle unattended for more than 10 minutes. One authority said it would need to be decided by consultation with local stakeholders and residents and that enforcement should be especially targeted around schools, hospitals and care centres where those who are most affected by such parking are most impacted.

Others said that in streets where the width of the road means that parking on the carriageway is not possible without impeding the flow of traffic it should not follow that pavement parking is necessary in all cases. The alternative parking options available needed to be considered. 'Unnecessary' would imply that the driver has other parking options available to them within a short distance (one suggestion was with 100m) to avoid parking on the pavement. It is only if there are no reasonable alternatives available that pavement parking could be considered necessary to permit the free flow of traffic. Others felt that pavement parking should be deemed unnecessary in all but exceptional circumstances, irrespective of whether there was alternative parking nearby.

There was a view that the proposed 20-minute exception for loading/unloading should only apply where there is a minimum width for pedestrians to pass. Another said that operators should be expected to make alternative arrangements (e.g. handcarting or pallet trucking) and if there is no such option the carriageway should be obstructed rather than the pavement. Another suggestion was that if loading/unloading was to be allowed for up to 20

minutes, it should be within specified times which are widely publicised locally so that disabled people are able to avoid those times.

On the question of whether space for single file or double file traffic should be maintained, one suggestion was that double file should only be required on A roads, B roads or other roads designated by local authorities. On all other streets single file should suffice.

Others suggested that inclusion of the subjective word 'unnecessary' could lead to a large number of appeals. The word 'unnecessary' should be removed to help provide more clarity to the definition. This would mean the CEO only had to determine if the vehicle was causing an obstruction. In this respect, some respondents also mentioned that the definition should include some reference to a minimum width in which a pedestrian, including wheelchair or pram users, could reasonably use the pavement or footway without being forced to walk into the road. The minimum width recommended by respondents ranged from 0.8 metres to 3 metres. One said the minimum width will already be defined by existing street lamps, telephone poles and pavement trees so a line already exists beyond which vehicle parking should be prohibited. Others warned against specifying a minimum width as it risked encouraging this width to become the norm, even in areas where there was adequate space to park on the carriageway, leading to an increase in the level of parking with two wheels on the pavement. Others suggested replacing 'unnecessary' with 'permissible' or 'unreasonable'.

Some thought the government should go further and permit civil enforcement not only for pavement obstruction but also for obstruction of the highway (including obstructing entrances/exits, driveways, junctions and road).

There was support for the idea of seeking to define unnecessary obstruction in guidance, using examples, rather than legislation. This would allow the flexibility to revise the guidance in response to changing circumstances. Examples of where parking on the pavement is necessary could also be included, for example, a vehicle being used for setting down a passenger (and maybe left to escort a disabled or child passenger), loading/unloading heavy goods, etc. A national communications campaign was recommended to aid understanding and compliance and reverse the perception that pavement parking is permitted, while promoting behaviour change and compliance among motorists.

Do you think a warning notice should be given for first time offences of causing an unnecessary obstruction by parking on the pavement?

Table 9: summary of responses to question - Do you think a warning notice should be given for first time offences of causing an unnecessary obstruction by parking on the pavement?

	Yes	%	No	%	Don't know	%	Response Total
Individuals	7234	49	7128	48	414	3	14776

Local authorities	73	48	75	49	5	3	153
Commercial businesses	25	58	18	42	0	0	43
Other organisations	100	51	89	45	7	4	196

What do you think are the advantages and disadvantages associated with this Option 2?

Summary of responses

Advantages

Individuals

Of the responses received many suggested there were advantages associated with Option 2. Many of these people listed advantages associated with the delivery of Option 2, including advantages relating to:

- local decision making and enforcement;
- it being an improvement on the current system;
- guidelines being clear and easy to follow;
- the simple legislation change needed;
- low delivery costs;
- fast implementation;
- job creation;
- less enforcement work for police; and
- ability for improved enforcement.

A substantial minority highlighted the advantages of better access for those using the pavements, due to the potential in reduced pavement parking:

- accessibility benefits (e.g. wheelchair access);
- accessible pavements in general;
- accessible pavements for walking;
- accessible pavements for push chair access; and
- accessible pavements for cycling.

Another substantial minority noted advantages of Option 2 related to pavement parking still being allowed in certain areas, meaning individuals could retain vehicular access in some circumstances. Retained access was also highlighted for emergency services and deliveries.

A substantial minority highlighted advantages relating to changes in car use and parking. Examples included:

- reduced unnecessary pavement parking;
- reduced car usage;
- reduced congestion; and
- reduced car ownership.

The societal and public benefits of Option 2 were noted by a small minority, including:

- public acceptability;
- provides opportunity to educate motorists;
- social benefits more generally;
- public realm benefits;
- business/economy would be supported;
- public health benefits;
- encourage active travel/investment in active travel initiatives;
- noise pollution benefits;
- encourages introduction of free/affordable alternative parking provisions; and
- pedestrians and vehicles given equal priority.

A small minority suggested that Option 2 would result in road safety benefits.

A small minority also suggested that the fines resulting from Option 2 could be used in an advantageous way, including to fund enforcement and pavement repairs. It was noted that fines would be a good deterrent to reduce pavement parking.

A small minority highlighted that an advantage of Option 2 would include improvements to the physical appearance of streets, including less damage to curbs and pavements as a result of pavement parking; as well as reduced sign clutter as there would not be a need for signage showing areas where pavement parking is permitted.

A small minority suggested there would be a general environmental benefit, including specifically to air quality and CO2 emissions.

Organisations

There was a view from **local authorities** that with appropriate publicity and warning notices, the public would adapt to accepting this approach with less confusion than the other options. It would offer some flexibility for the motorists as pavement parking would still be allowed in some places.

Option 2 would free-up police resource to deal with more serious issues. Implementing Option 2 would make the public aware that local authorities can resolve all enquiries regarding obstruction of a pavement and remove confusion as to whether the local authority or police was the enforcement authority. It would also help if local authorities could enforce against vehicles parking within 10 metres of a junction, removing a burden from the police.

This would not reduce parking supply as much as Option 3 and would avoid widespread displacement of vehicles to alternative parking spaces.

Local authorities said their local knowledge meant they were best placed to adopt measures that would suit their area (including their road network and built environment). Option 2 would allow them to implement a different approach in areas where no alternatives were available to motorists. It would also allow local authorities to enforce with sensitivity relevant to local conditions. This could lead to the new restrictions being known and understood by all. They also pointed out that enforcement could be carried out where necessary without the need for costly TROs and additional signage or road markings.

Commercial businesses stated that Option 2 would enable partial pavement parking where necessary to help maintain the free flow of traffic. This would allow residential or rural roads with low traffic levels to be assessed for accessibility and safety before deciding whether pavement parking should be enforced. This option was more reasonable and fair compared to Option 3, potentially allowing those with genuine reasons, to park.

These discretionary powers were considered more appropriate than blanket prohibition which would just force the problem elsewhere, causing unintended consequences.

A view from **other organisations** was that it may deter people from owning vehicles and nudge people into thinking about using an alternative to driving if there was not somewhere convenient to park.

Some **organisations** said that this option would be quick and relatively inexpensive to implement and the most effective and proportionate way forward, at least in the short term, giving local authorities more flexibility, discretion and power to target serious contraventions that most impact pedestrians. Option 2 takes into consideration that not every street is the same and gives local authorities the chance to target problem areas.

This option would enable councils to issue penalties without having to carry out an extensive audit of the road network to identify roads where pavement parking should be permitted (as required by Option 3), saving significant amounts of resource and administrative time. Also, there would be no need for the costly painting of white lines and signage, increasing street clutter, that would be required to mark out the exemptions in the event of a national prohibition.

Some **organisations** welcomed this option stating that adopting it would eliminate confusion over responsibilities for obstruction (and would free up police resources to deal with more serious issues) and could enable councils to issue PCNs to help tackle the worst instances of inconsiderate obstructive pavement parking. One advantage of civil enforcement over the current system is that obstruction contraventions would be decided on the nature of the parking rather than an actual obstruction proven. CEOs already had some experience of issuing penalties for obstruction in car parks. A national communications campaign would be required to ensure understanding and compliance. This would send a clear message to the public that obstruction would be enforced by the local authority. Regular publishing by local authorities of the locations where enforcement will occur, locally, would make enforcement transparent and raise even greater awareness of the issue. The evaluation and learnings from Option 2, as well as the increased understanding and awareness of the issue from the public, could inform and evidence future consideration of the need for a prohibition on pavement parking (Option 3).

Option 2 was seen as a tool that could tackle “overhanging”. This is where the front or rear of a vehicle, which may be parked on land owned by a householder or business with perhaps none of its wheels being on the pavement, nevertheless projects over the pavement in such a way that pedestrians are obstructed.

Disadvantages

Individuals

Of the responses received the majority suggested there were disadvantages associated with Option 2. The majority of those people highlighted disadvantages associated with enforcement concerns, including:

- no/low levels of enforcement anticipated;
- will not act as a deterrent to pavement parking;
- lack of resources for enforcement;
- inconsistent enforcement anticipated;
- concerns relating to 20-minute loading/unloading exemption;
- concerns over the cost of enforcement;
- concerns that enforcement will be subjective;
- lack of resources for challenges to PCNs;
- two bodies enforcing - confusing for car owner; and
- concerns for the safety of the officers.

Many anticipated disadvantages relating to implementation and delivery of Option 2, including:

- the rules of Option 2 are too subjective/vague/confusing;
- the option would be open to abuse;
- the approach is not national;
- ineffective local council management regarding implementation;
- fines would be used as a money-making scheme;
- fines would result in disproportionate impact on low income populations;
- significant signage would be required;
- limited local decision making;
- benefits of the proposal will take time to become apparent; and
- the proposal would be costly to implement.

A small minority suggested that drivers would be left disadvantaged by Option 2 and they would have reduced parking access. Specifically, these sentiments related to:

- there being nowhere for residents/visitors to park;
- difficulties for deliveries;
- risks damage to vehicles due to lack of pavement parking; and
- reduced property value due to lack of residential parking.

A small minority noted that traffic flow would be negatively impacted by Option 2, specifically relating to congestion concerns and accessibility concerns for emergency vehicles.

A small minority suggested that Option 2 would result in negative social impacts, including:

- driver dissatisfaction/irritation/disputes;
- personal freedoms being impeded;
- anti-social behaviour/crime would be encouraged; and
- pavement parking would spill into other areas if reduced in others.

Another small minority highlighted a disadvantage of the possibility of pavement parking still occurring under Option 2, including:

- accessibility concerns for those with disabilities;
- business exemption is ineffective in stopping pavement parking;
- pavements/kerbs/verges will continue to get damaged; and
- accessibility concerns for those with pushchairs.

A small minority also suggested that Option 2 could result in road safety issues.

A small minority suggested a disadvantage of Option 2 is that it does not support other changes that need to take place, such as:

- improved road design/better infrastructure;
- active travel initiatives, including sustainable last mile deliveries;
- decreased car ownership;
- prioritisation of pedestrians/cyclists on pavements; and
- EV (Electric Vehicle) infrastructure.

Another small minority put forward that Option 2 would result in negative economic outcomes, and more specifically would result in loss of passing trade for businesses and impact on business deliveries.

A small minority also suggested that Option 2 would result in negative impacts on the environment and result in more pollution, due to drivers driving for longer to find a space, and increased congestion, assuming cars would choose to park fully on the road and block access instead of risking a fine.

Another small minority suggested that Option 2 would have a negative impact on the physical appearance of an area.

Organisations

Some **local authorities** expressed concerns about the cost of implementing this option. It was suggested that councils would still need to assess the road network to identify potential hot spots and may need to mark bays on the footway to clarify what is acceptable. Without this, local awareness of where pavement parking would be deemed 'not obstructive', would be limited.

If partial pavement parking is allowed, it could mean that pavements and verges would still be damaged and require repairs. Moreover, additional funding for an appropriate level of resources (e.g. administration and enforcement) would have to come from local authority budgets. This additional burden may mean that some local authorities may find it difficult to implement the scheme. Enforcement levels may be low due to limited resources and so this may not meet public expectation.

Some doubted that the additional income from PCNs would cover the cost of the back-office resource to manage appeals and objections. The reports of obstructive parking could be significant and the public's view of obstructive parking is likely to differ widely from any policy that local authorities put in place. It was suggested that the level of fines would need to be sufficiently high to help cover this cost.

Local authorities were concerned that it may be difficult to define contraventions in each case as the term 'unnecessary obstruction' is ambiguous. This could potentially lead to inconsistencies in interpretation and enforcement across local authorities.

The decision or interpretation of whether an 'unnecessary obstruction' has been caused will be at the discretion of local authority enforcement officers. There may be locations where the minimum access width is not possible and there is no alternative but to enable pavement parking to provide access for emergency vehicles.

It was also stated that the 20 minutes loading exemption would be very difficult for enforcement officers to record and enforce. People could use this to circumvent the restriction. Furthermore, if the 20-minute exemption was only for businesses it would be difficult to enforce if the vehicle was not signed/marked. Consideration should be given to extending the 20-minute exemption to non-business vehicles for unloading shopping etc into houses.

First warnings would require holding personal data on databases to check if a driver had had one before. This posed problems for how long to retain data in anticipation of a second offence. Would drivers get a first warning at each location? Would the warning be for the vehicle or driver? An alternative could be a two-week period for warning notices to be issued before penalties are issued.

Commercial businesses expressed concerns that the 20 minutes exemption period for delivery may be exploited.

Some thought councils may opt not to use the power and that motorists would claim not to understand it. There was some doubt as to whether CEOs would have sufficient people skills or training to use general common sense and listen to genuine requests from motorists. The ambiguity of unnecessary obstruction may encourage people to flout rules more.

Some **other organisations** expressed concerns that implementing Option 2 could cause confusion to roads users if different rules were adopted by local authorities. Without clear rules on when and where pavement parking is prohibited, the impact on driver behaviour was likely to be muted. There would still be parking on pavements impeding pedestrians. Therefore, Option 2 may not significantly improve accessibility. It could result in no change to the current status quo.

The scope for dispute about what is “necessary” was the main disadvantage and could provide people with what they consider an excuse to park across the pavement. Drivers could claim “ignorance”.

A view was expressed that local authorities could not be relied upon to apply judgement fairly thus some people may be wrongly penalised. Also, it would not be clear to visitors as to whether pavement parking is permitted in a given area.

Many of the instances of pavement parking last no more than a few minutes e.g. while someone runs into a shop. The chances of this kind of behaviour being spotted and acted upon in the limited time available was considered very small.

Other organisations argued that to make it work, local authorities would need a proactive approach and sufficient enforcement officers in place to provide a rapid response to complaints. It was also argued that there is no point having a 20 minute exemption period for delivery if enforcement officers are unable to respond within that time. It was also stated that it would prevent private individuals from unloading. Others thought it wrong that a vulnerable pedestrian or person with a pram should have to wait 20 minutes while someone blocks the pavement to unload.

Many would see it as a licence for councils to print money. It could upset the trust in councils and the relationship with residents that is important for community cohesion.

Parking hotspots near big sports and entertainment venues attract high numbers of first-time visitors so the warning notice for first offences is likely to be less effective at solving pavement parking contraventions in these areas in short and long term.

England would be out of line with London and Scotland.

Commercial businesses and Other organisations had concerns about how local authorities would police and enforce Option 2 with minimal resources. They said it may be difficult to get local authorities to enforce obstructive parking, agree its definition and prioritise it. It was highlighted that local authorities may not have the resources to enforce outside of their usual working hours when pavement parking is likely to be more prevalent.

There was a view that even with targeted enforcement, the only long-term route to compliance is clear public understanding and behaviour change that would come with a simple well understood rule for parking on the pavement as provided by Option 3.

Commercial businesses and Other organisations commented on the fact that some over-zealous local authorities could target innocent motorists. To avoid this, it was suggested that guidance be provided to clarify the meaning of ‘unnecessary obstruction’.

All types of Organisations said that lack of clarity with this option could lead to arguments between motorists and CEOs and many appeals. This might lead to a scenario where CEOs even have to carry a tape measure and take photographic evidence of a breach of the obstruction.

Unlike most other parking offences, there would be no traffic signs or bay markings informing motorists of local regulations. For the offence to be understood it was suggested

that publicity and education campaigns would be needed nationally and locally for a period before and after its introduction.

All types of Organisations acknowledged that allowing partial pavement parking would continue to inhibit the safe movement of vulnerable road users such as the elderly, disabled and those with children or prams. They also stated that simply issuing a PCN does not resolve the issue for the pedestrian as the pavement would remain obstructed until the vehicle was moved.

All types of Organisations had concerns that limited availability of parking particularly in rural locations could lead to displacement of parking. This could lead to higher levels of pollution as drivers look for an alternative place to park. If vehicles parked on narrow roads it would impede access for emergency vehicles.

Do you think a national prohibition should apply

Table 10: summary of responses to question - Do you think a national prohibition should apply:

	on no roads (since you are against the proposal)?	on all public roads within the country?	only on roads with speed limits up to 40mph (this includes roads in villages, towns and cities)?	in an alternative way of your description?	Response Total
Individuals	2269 (15%)	9625 (64%)	1944 (13%)	1137 (8%)	14975
Local authorities	52 (33%)	58 (37%)	17 (11%)	29 (19%)	156
Commercial businesses	9 (20%)	25 (57%)	4 (9%)	6 (14%)	44
Other organisations	21 (10%)	130 (63%)	36 (17%)	19 (9%)	206

Describe your alternative approach:

Individuals

Alternative descriptions for where Option 3 should apply were made within a small minority of responses and followed four distinct themes. These are outlined below in order of prevalence.

Option 3 should be applied based on existing road characteristics:

- based on the width of the road, such as in roads with lane separation markings, or where parking in the road would restrict emergency vehicle access;
- based on the width and availability of the pavement, such as in roads with only one available pavement, or where pavement width would be reduced to less than 1.5m if pavement parking were permitted;
- on roads where alternative parking is available on or near the road;
- on all double yellow lines/at all junctions/blind spots/dangerous locations/dropped kerbs;
- on grassed verges;
- on roads with cycle lanes;
- on trunk roads, A roads and main thoroughfares; or
- in areas with street lighting.

Option 3 should be applied based on the type of area:

- on all public and private roads within the country;
- in city centre, town and urban areas only, with support for a rural exemption;
- exemptions for residential areas with support also shown for a prohibition in residential areas;
- in areas near schools, hospitals, community centres, council offices and other public spaces and services; or
- in business park areas.

There should be exemptions for specific groups/circumstances:

- those with disabilities, including those with a Blue Badge; or
- a 20-minute exemption for unloading and loading (with a similar number also rejecting this exemption) and a very small minority suggesting that it should be limited to 10 minutes or increased for house moves. A small minority also showed support for the unloading/loading exemption being broadened to include non-business loading and unloading;
- residents, including suggestions that this exemption should be overnight, or be restricted to one vehicle per household;
- vehicles that have broken down or are assisting a break down; taxi and private hire vehicles; or
- a general concern for the exemptions outlined for Option 3.

Option 3 should be applied based on road speed:

- on roads with speed limits greater than 20mph.
- on roads with speed limits up to 30mph;
- on roads with speed limits greater than 30mph;
- on roads with speed limits greater than 40mph;
- on roads with speed limits up to 50mph; or
- on roads with speed limits greater than 50mph.

A small minority of responses were made in relation to the delivery of Option 3. Of these, the majority of responses asked that Option 3 be delivered with local resident consultation.

In addition, many or less noted that Option 3:

- should only be delivered on one side of the road (many);
- should only be in place at specific times of day, such as early morning or overnight (small minority).

Organisations

An alternative suggested by **local authorities** was managing pavement parking within Controlled Parking Zones (CPZ) where entry signs within an area indicate a general restriction on pavement parking. This would provide road users with clear rules on where pavement parking is allowed. As the signs would only be at the entrance to the area it would reduce the need for a plethora of signs along the road.

A **commercial business** suggested on roads up to 30mph - if there was a problem on 40mph roads then specific measures could still be taken to deal with them on a case-by-case basis. The workload would be more practicable.

Some **other organisations** commented that where people's homes sit alongside roads with speed limits over 40mph, pavements provide the only safe space for pedestrians. Conversely, it was said that as pedestrians are most likely to be travelling along roads up to 40mph, to focus on these roads. This smaller number of roads was likely to take less time and be less costly for local authorities to implement.

Another said that it needs to be more specific and suggested it is applied to roads up to 30mph, but with the ability for areas to 'opt out' where roads are too narrow. It should also be applied on trunk routes and routes involving double yellow lines or 'no overtaking' markings.

Other alternative suggestions provided by **all types of organisations** included on residential roads with speed limits up to 30 mph, on roads over 4 meters wide, in built up areas and on roads with narrow footways of 1.5m width or less.

Should a national prohibition apply to verges:

Table 11: summary of responses to question - Should a national prohibition apply to:

	pavements only?	%	pavements and verges?	%	Response Total
Individuals	3958	31	8629	69	12587
Local authorities	19	19	83	81	102
Commercial businesses	13	38	21	62	34

What are your views on the impact this would have on the built and historic environment?

Individuals

The majority of responses made reference to the impact of signage and road markings permitting pavement parking on the built and historic environment, indicating:

- the impact would be positive;
- the impact would be negative;
- there would be no or only a minimal impact; or
- commented on the management and delivery of signs and road markings.

Of the many responses noting a positive impact on the built and historic environment of signs and road markings permitting pavement parking, many highlighted specific benefits of a prohibition on pavement parking on the physical appearance of the built and historic environment. Specifically, responses noted that there would be reduced visual blight from reduced pavement parking, reduced pavement damage and fewer cars on the road generally, including due to reduced car ownership as a result of the proposal.

A similar number of responses suggested that the signage and road markings permitting pavement parking would be better, visually, than mass pavement parking, or that the impact would be positive, without further detail.

In contrast, of the substantial minority of responses noting a negative impact on the built and historic environment, the vast majority raised concerns for visual blight caused by the following (in order of prevalence):

- the signs and road markings themselves;
- the ongoing use of the pavement for parking;
- continued damage to the curb/pavement/road, as a result of pavement parking;
- other, existing street furniture, such as wheelie bins and EV charge points, which will not be regulated by the proposals;
- any changes to street infrastructure and character as a result of accommodating parking (not including the signs and road markings themselves); and
- increased car use through the area, as a result of drivers looking for places to park.

A very small minority showed concern for damage to buildings due to increased use of the areas permitting pavement parking, specifically, pollution damage and disruption of foundations from increased vibrations.

A substantial minority of comments were made on the management and delivery of signs and road markings, with many focused on how the signs and road markings should look. Suggestions included:

- ensuring road markings and signage are used sparingly and sensitively, including by using existing lampposts for signage, coloured bricks, studs or dotted road markings, rather than solid white or yellow lines, or electronic signage. A very small minority suggested that Option 3 should be delivered alongside policy to remove unnecessary signage; and
- a preference for road markings over signage, and vice versa.

Organisations

Some **local authorities** were concerned that there would need to be additional signage in areas that already have other parking signage in place. This could cause conflict between the need to sign sufficiently and the need to reduce sign clutter. Further signage would be an obstacle to vulnerable pedestrians. However, others said that there are already a significant number of residential streets with parking restrictions so an increase in signage and road markings would have minimal impact on the environment. The impact would be limited if designed correctly, for example different post heights in keeping with the environment. Consideration should be given to entrance treatment for streets where pavement parking is permissible in marked bays. Marked bays are less intrusive, but likely to be subject to ongoing maintenance costs as they become worn.

Local authorities recognised that road markings in historical/conservation areas would not suit the street scene. This could have an impact on the natural character of an area and make it less attractive. It was also stated that it is very difficult to mark out and maintain road markings in a cobbled street. No road markings, just signs on lamp posts was suggested.

Conversely, the reduction in vehicles on the pavement would improve the aesthetic value, accessibility and environmental quality of built and historic environments, contribute towards the 'place-making' objective and encourage better integration and cohesion amongst communities. The measure would reduce physical damage to the environment by reducing vibration, impact and pollution. It would be better to have signs than vehicles and the measure would reduce the overall amount of parking in historic environments.

Local authorities mentioned that pavement parking causes damage to pavements making the environment unattractive, especially around historic places where pavements are made from historic materials. This often leads to the replacement of footway materials with more modern materials which detract from the character of the historic environment.

Local authorities mentioned that air quality and CO₂ emissions would improve because there would be less vehicles in the area if pavement parking was restricted. Conversely, they were also concerned that it could lead to congestion as people look for places to park resulting in increased air pollution.

It was also recognised by **local authorities** that a national prohibition could lead to parking displacement in many areas as drivers look for alternative parking places. Due to limited parking options it was suggested that some residents may decide to pave over their gardens to create off street parking. This could cause a loss of biodiversity and create flooding and drainage issues.

Commercial businesses were concerned that a national prohibition could lead to narrower streets as vehicles would be parked on the road rather than the pavement. This could potentially impede delivery and emergency vehicles. Slowing traffic flow would cause pollution. Conversely, others said that forcing drivers to park on the road and narrowing the road space would reduce speed and so make the roads safer and more attractive to walking and cycling.

Other comments made by **commercial businesses** included the risk of increased street clutter having a detrimental impact in historical areas. However, by keeping it simple the sign clutter could be minimised. In highly sensitive areas the marking of bays could possibly be achieved using white or light stone blocks. Local policies of sensitive sign mounting could be developed.

Some **other organisations** thought the visual appearance would be adversely affected, especially in Conservation Areas. In some streets additional signs and lines would be needed to indicate where pavement parking was permitted. These could be quite widespread in areas of narrow residential streets with little off-road parking. However, others saw the Option 3 prohibition as an excellent opportunity to remove unsightly vehicle clutter. Removing pavement parking in historic towns and villages would enhance and protect the streetscape. Controlled and organised bay parking and signs, would be better for the environment than vehicles on pavements. Careful design using minimal signs and markings in the smallest sizes could help minimise the adverse visual impact of clutter in sensitive areas. Some thought that road markings should be used instead of signs, as this would be visually more pleasing and help to open street views. More pole signage could create more hazards for disabled people especially for those with visual impairments. Others felt that lines on road may not be needed if appropriate signs are placed at the start and finish of a length of road or zone. Consideration should be given to employing signage on an area basis rather than street by street. Bay markings would only be needed if parking was only to be permitted in certain spots within the street/zone. It was felt that traffic signs could be very minimal and placed on lamp columns and other existing infrastructure to reduce both the cost and street clutter. Exemptions to pavement parking should be used sparingly where necessary, minimising any effect on the built and historic environment. Signs and bay markings are already in place and being used in London without significant negative impacts on the built environment.

It was said by **other organisations** that pavement parking can cause extensive damage to very old and historic pavements. A national prohibition would help to preserve these. Where pavement parking was necessary, councils should introduce time restrictions for deliveries in order to avoid the pavement being obstructed during busy times of the day when the street would be busy.

They suggested benefits including: Parking being difficult could make people think more about not using or owning cars, and this should be the long-term aim for authorities. Over time, parking and loading restrictions will dynamically change both property selection and mobility decisions. Councils could develop this by restricting parking permits to 2 per household, providing alternative residents parking in the area, and charging a premium for larger or polluting vehicles. Such steps would facilitate parallel policies in respect of air quality, noise, congestion, road safety, active travel, public health, and combating isolation and loneliness.

It was expressed that having no pavement parking associated with terraced housing without driveways would reduce property values and so greatly help to create availability of genuinely affordable housing. Focus should be given to car alternatives including active transport and passenger transport.

It was also noted that the creation of alternative parking options may impact on the availability of green space.

What do you think are the advantages and disadvantages of Option 3:

[Note: The majority of comments from individuals were common across each of the area types described below and have been recorded under the 'Overall' section. Where there was a specific reference to an area type, it has been included in the relevant section]

for rural areas including villages?

Advantages

Individuals

The environment:

- reduced impact on wildlife and reduced waste crime was anticipated.

Socio-economic factors:

- reduced house prices, allowing people to join the property ladder; and
- increased house prices, due to improved visual appearance of properties and roads.

Organisations

Local authorities believed this option would ensure that roads are kept clear at beauty spots and in National Parks where cars often block roads meaning that local farm traffic, deliveries or emergency vehicles are unable to get through.

Commercial businesses acknowledged that there may be less pressure to park on pavements in rural areas when compared to other areas, however, it was recognised that they still have the same fundamental issues. They stated that a national prohibition would stop people ruining villages by parking indiscriminately. This would help to keep grass verges protected and clear to walk on. It would also help provide better accessibility for wheelchair users and prams, allow traffic to flow faster and get more people to walk and cycle.

Other organisations acknowledged that rural areas and villages are affected by pavement parking too; some streets only have a pavement on one side forcing pedestrians into the carriageway. A national prohibition on pavement parking would create an obligation for local authorities to consider the needs of vulnerable rural pedestrians.

Moving vehicles from the pavement to on-street parking could promote traffic calming as vehicles would have to reduce their speed. Including verges in the prohibition would protect green spaces and help beautify the environment.

All types of organisations were of the view that a national prohibition would keep the pavements clear and therefore provide a safer environment for pedestrians to walk. The traffic can be faster on rural roads so it would be more dangerous to be forced onto the road. A prohibition could preserve the character of villages and restore a more pleasant and tranquil way of life.

Disadvantages

Organisations

Local authorities felt that applying a national prohibition in rural areas could be disproportionate as pavement obstructions were not a significant issue in many rural locations. Implementation on rural roads would be particularly onerous and disproportionate to the parking issues experienced in many of these areas.

It could have a detrimental impact on the elderly, disabled people and parents with prams or young children who may be deprived access to village amenities as many villages do not have space for car parks near shops, churches and sports facilities. This could potentially result in the loss of trade for small businesses.

In a rural county, forcing vehicles to park on the carriageway may make some roads impassable creating accident risks for cyclists and horse riders. In some rural villages the only place to park is on verges and footways. Prohibiting footway parking could require extensive and expensive carriageway controls to combat unintended consequences of removing this parking. Work may be needed to ensure that parking on the road is safe, has increased lighting and enhanced village gateways.

The public would expect enforcement but it would be difficult and costly in widely dispersed areas, requiring significant additional resources. Villages can vary considerably and it would be far more difficult to adopt a consistent approach across the country.

Other comments from **local authorities** included: busy roads through villages may become less safe; it may impact on local event promotions; there may be difficulty in using white markings especially on cobbled streets; it may cause more parking on grass verges unless the prohibition was applied there; levels of car ownership may be high in such locations due to lack of access to public transport creating a greater demand on available parking space.

Commercial businesses said pavement parking is not the same as in densely populated areas. It was suggested that applying the prohibition to narrow roads could potentially

result in the loss of trade for small businesses who do not have space for car parks. They said that special provisions may be required to negate this issue. Applying this in rural areas might prevent almost all village community events etc.

They also stated that emergency and large vehicles or agricultural machinery could find it difficult to navigate narrow streets due to the obstruction caused by vehicles parked on narrow roads.

Other organisations said that local authorities would need to assess each area individually as many small villages have no option but for the residents to park on the pavements.

Other organisations said villages do not often have defined pavements so it might be easier to enforce against inconsiderate parking rather than prohibit all sensible pavement parking. They considered that it would be expensive to implement and difficult to enforce. If exemptions were not properly implemented, vehicles could be pushed fully onto narrower country roads causing obstruction (particularly larger vehicles e.g. agricultural vehicles) and congestion, creating hazards where the speed limit is 40mph and the roads have bends. Concerns were also raised regarding the likelihood of effective enforcement occurring in rural areas.

It was believed that implementing Option 3 in rural areas would require additional signage which would spoil the environment.

Another suggested that verges may become car parks, harming the vegetation and ecology, if they were not included in the prohibition.

A view from **other organisations** was that good accessible transport services were required in rural areas where there is currently a reliance on private cars, which have to be parked somewhere. Given a lack of off-street residents parking, a restriction on pavement parking could cause difficulty especially where residents have a disability. It was also suggested that reduced parking provisions could affect village shops.

Local authorities and commercial businesses also suggested that reduced parking provisions could affect village shops.

All types of organisations stated that a national prohibition could prove to be unpopular with residents if they are unable to park outside their homes. This could lead to a displacement of parking which could result in conflict and disagreements between residents. Moreover, they stated that due to inadequate public transport in rural areas car ownership per household tends to be higher resulting in greater dependency on private car use.

for suburban areas?

Advantages

Individuals

Socio-economic factors:

- increased house prices, due to improved visual appearance of properties and roads.

Road safety:

- reduced need to walk in the road and improved safety from reduced pavement damage.

Behavioural change:

- encouragement of small car ownership.

Visual appearance:

- reduction in damage to vehicles.

Type of proposal:

- would be easier to enforce and quick to implement.

Organisations

Local authorities believe a prohibition would force them to review their on-street parking provisions. It would give them the opportunity to identify roads that should be exempt from the prohibition and improve their ability to enforce anti-social parking.

Although it was felt that this option was inflexible, **local authorities** acknowledged that it would be easier to implement, as no TROs would be required. They stated that the rules would provide a clear national message, avoiding ambiguity, that would be clearly understood by all road users and therefore easier to enforce. This aligned with the current regulations governing pavement parking in London and Scotland.

They stated that a national prohibition on pavement parking would provide a safer environment for pedestrians by reducing the likelihood of them having to walk in the road. They suggested that parking on the road would have the additional benefit of acting as a traffic calming mechanism as vehicles would have to reduce their speed.

Commercial businesses said that a national prohibition would help keep the footway clear and create a safer and more accessible environment for pedestrians. It would encourage people to walk and cycle more whilst helping stop damage to pavements and grass verges caused by vehicles. Many more people are affected by pavement parking in suburban areas due to higher footfall and would benefit from this measure.

Other organisations believed that a national pavement parking prohibition would provide safe use of the pavements for all pedestrians. A national prohibition on pavement parking would remind all residents that pavements are not private property and are for everyone to use. It would provide all roads users with a clear universal message that would be understood by all. In suburban areas, the higher concentration of vulnerable pedestrians will benefit where pavements are particularly hindered by parked vehicles.

By removing the ambiguity associated with Option 2 (“unnecessary obstruction”), it would ensure a more consistent and fairer approach to local authority enforcement. This option would allow local authorities to adopt a more sensitive approach to the specific needs of certain areas within their boundary.

Other organisations stated that prohibiting pavement parking could lead to less people driving to inner cities to park their vehicles. This could result in more parking spaces becoming available to install EV charging points for electric vehicles.

Other comments included better emergency vehicle and bus access; and that it places the onus on local authorities to make exemptions.

Local authorities and commercial businesses also suggested that it may encourage residents to park on their driveways rather than on verges thereby helping to protect green spaces.

Local authorities and other organisations believed that it would improve accessibility for vulnerable road users who would find it much easier to access their local community. It could also lead to greater play areas for children to play in. The higher density of people in suburban areas means the benefits to pedestrians are greater here.

All types of organisations said that prohibiting vehicles from parking on the pavement will improve the visual appearance and pleasantness of the local environment and reduce the damage to pavements and verges.

All types of organisations claimed that a national pavement parking prohibition could potentially make people consider whether car ownership is necessary or encourage them to buy smaller vehicles. This could result in greater support for active travel with more people deciding to walk, cycle or use public transport. Less car use would result in a reduction of air pollution and enable pedestrians to make short journeys without being impeded by parked cars or having to contend with damaged pavements.

Disadvantages

Organisations

Local authorities argued that in many suburban locations pavement parking is not a significant problem and therefore a prohibition on all roads is unnecessary.

They stated that vehicles parked fully on the road could have a negative impact on the provision of public transport services. Bus routes could be impeded by vehicles and this could impact on bus service performance and lead to services being delayed, re-routed or

cancelled. It could also lead to a loss of revenue. Road parking may also affect cycle routes near the kerbside.

The measure may cause overflow issues. It would mean demand for additional hardstanding and potential blocking of side roads to emergency vehicles because of the overspill.

Other comments from **local authorities** included deliveries being affected; and that the layout of some suburban areas may not meet the requirements set in Traffic Signs Regulations and General Directions 2016 (TSRGD).

Other organisations believed that there could be substantial opposition to any attempt to restrict car use as the current infrastructure for public transport provision is inadequate. Reliable, accessible transport services would be needed to encourage people not to use their cars. They also said that a prohibition could have an adverse impact in low income areas where in many cases off-street parking is not available. With multiple car ownership in many households some suburban areas could see more cars parking on verges.

They said that there would be unnecessary substantial initial setup costs as each local authority would have to review their road network to determine which areas or roads require pavement parking exemptions. This would mean that the introduction of a national prohibition would require a significant implementation period to ensure the right roads are identified.

Other organisations believed that an England wide prohibition could lead to more obstructions on roads leading to increased traffic congestion and traffic incidents between vehicles.

They also said that people may have to walk further due to parking a longer distance away from their destination. This may not be appropriate for vulnerable motorists and so they may struggle to access local amenities.

They stated that a national prohibition in suburban areas is not feasible due to the lack of alternative parking facilities. Many suburban areas do not have adequate parking for modern living, most homes now have two or more cars. The demand for vehicles in these areas is high and implementing a prohibition could cause displacement and conflict within local communities. It could lead to more vehicles parking inappropriately on green spaces which could affect the biodiversity within the area or residents converting their gardens into driveways which could present an additional flood risk.

Local authorities and commercial businesses suggested that a national pavement parking prohibition would lead to an increase in sign clutter on exempted roads and place an additional maintenance and enforcement burden on local authorities.

Commercial businesses and other organisations had concerns that residents living in terraced houses with no off-street parking facilities may be forced to park further away from their homes. This could possibly affect house prices and eventually lead to some residents moving away. It would be worse for elderly and disabled people; those with Blue Badges may need to be exempt from the prohibition. They also suggested that reduced parking provisions could affect high street businesses as passing traffic would be discouraged from stopping. Residents and visitors from other areas, who would be

potential customers, may have nowhere to park and decide to take their custom elsewhere where adequate parking or loading is available.

Residential areas can be overwhelmed with parking and in these areas alternative provision would be needed.

for town and city centres?

Advantages

Individuals

Behavioural change:

- encouragement of small car ownership.

Visual appearance:

- reduction in damage to vehicles.

Type of proposal:

- would be easier to enforce here.

Organisations

Commercial businesses stated that pavement parking exemptions on narrow roads would ensure the road was not obstructed and traffic flow not impeded e.g. allowing pavement parking on one side of the road. It was acknowledged that pavement obstruction should be addressed in shopping and central areas. It gives a strong message that pedestrians matter.

Other organisations said that a national prohibition would free inner cities from overcrowded parking. Less vehicles seeking to park in cities could result in less pollution and improved air quality. Reducing parking on footways in town and city centres is particularly important in enabling the welcome movement towards more vehicle-free spaces and vehicle-free times of day. They stated that the provision of public transport in these areas is adequate and that people have the additional option to walk or cycle short distances. They also mentioned that this option places the onus on local authorities to identify exempted roads and ensure they are appropriately signed to show where parking is permitted.

Some **local authorities and other organisations** felt that a complete prohibition would be easier to implement and enforce, especially as exemptions would not require TROs. This option provides a clear national message which would be understood by all road users and avoids the ambiguity associated with Option 2 ('unnecessary obstruction'). It may be more conducive to larger city centres with better funded transport systems and lower levels of car ownership.

They said it would also align with the current legislation governing pavement parking in London and Scotland.

All types of organisations said that a national pavement parking prohibition would provide a safer environment for pedestrians especially the elderly, disabled and those with young families. It would allow them to use the pavement without the risk of having to walk in the road to avoid parked vehicles and provide them with easier access to local amenities. It would result in less damage to pavements, promote active travel and improve the visual aspects of the environment. On-street parking could also act as a traffic management tool to reduce speed limits on certain roads. Clearer pavements could also free up space for the installation of EV charging points.

As several cities have park and ride facilities, **all types of organisations** recognised that a national prohibition could help promote more active and sustainable travel to city or town centres. Exemptions such as priority parking could be made for those with mobility issues allowing them to park closer to amenities. Also, having an adequate and reliable public transport system in place in these areas may encourage people to consider whether car ownership is necessary.

Disadvantages

Individuals

Socio-economic factors:

- increased cost of alternative parking in city centres and towns, which could have a personal financial impact; and
- public health concerns from increased use of public transport in city centres and towns, rather than use of the private car, in the context of the Covid-19 pandemic.

Visual blight:

- visual impact of alternative parking provision in city centres and towns.

Organisations

Local authorities said this could be disproportionate. They would need to carry out consultations with residents in respect of roads proposed for an exemption. This could be divisive within the local community. Furthermore, there may be significant opposition in environmentally sensitive areas to increased road signs showing where parking is to be allowed. They also suggested that a nationwide prohibition may be an unpopular choice due to urbanisation.

They also said it could negatively impact people living in low income areas, in terraced streets with no off-street parking facility.

Commercial businesses stated that enforcement of a national prohibition would be down to local authority discretion.

It was acknowledged by **local authorities and commercial businesses** that most town centres already have restrictions in place to tackle parking in certain areas, so a national prohibition may be easier to enforce but it may not necessarily make a difference. Compliance may be better achieved via a good national campaign and raising driving awareness to the issues surrounding pavement parking.

Local authorities and other organisations believed a nationwide prohibition could lead to parking displacement to other areas requiring the expense of additional parking restrictions or controls - especially where space is at a premium. At a cost, local authorities would need to provide more parking provision to avoid traffic congestion.

Local authorities and other organisations stated that Option 3 could adversely impact businesses such as shops and pubs as it could discourage passing traffic from using their services. This could have a severe economic effect on town and city centres. Furthermore, deliveries and removals could be problematic if drivers cannot park in front of the property. The consequence of this could be another form of displacement as delivery drivers find nearby exempted roads to park.

All types of organisations stated that choosing Option 3 would lead to an increase in sign clutter and additional maintenance and enforcement burdens. They also stated that increased street clutter goes against the Department's traffic signs policy review which has the aim of reducing traffic sign clutter.

All types of organisations commented that the initial setup costs associated with implementing a national prohibition would be substantial and unnecessary. Councils would need to review their road network and introduce traffic management solutions in certain areas, such as narrow roads, where a total prohibition is not practical. Although they recognised that this option would provide all road users with simple, universally understood rules, they also believed that it would be inflexible.

All types of organisations said that a national prohibition would result in limited parking options and residents may not be able to park close to their homes or visitors park in the area. This would be a particular issue for people with mobility difficulties such as Blue Badge holders who would have to park further away from their homes and amenities. It could result in vehicles parking on footpaths, verges and land off the highway, which in some cases would not be enforceable by CEOs. More obstructions on the carriageway could impede traffic flow, especially for large vehicles, and cause congestion and pollution.

Overall?

Advantages

Individuals

The majority of responses noted benefits to access emerging from Option 3. Specifically, many responses noted that pavements in particular would be more accessible, with drivers parking more appropriately and pedestrian groups benefitting greatly from this, including those with disabilities; those with young children and using pushchairs; and the elderly. A very small minority of responses also suggested that cyclists could benefit from Option 3.

A substantial minority noted benefits to access in relation to improved vehicular access, including decreased congestion and ease of access for deliveries and emergency services. A small minority also indicated that vehicular access and parking would be retained in areas where pavement parking was permitted by the local authority. To ensure ongoing availability of parking at households, a small minority noted that there could be investments in alternative parking provisions where a prohibition is in place, and changes to development planning regulations for new developments, particularly in rural areas.

Furthermore, a substantial minority or less of responses noted advantages in relation to the following (in order of prevalence):

Road safety:

- a general statement of road safety benefits, without additional detail;
- slower vehicle speeds;
- for cyclists, due to fewer obstructions to cycle paths and an assumption that there could be fewer vehicles using the roads; and
- driver sight lines no longer being blocked.

Behavioural change:

- decreased car use, with people encouraged to walk instead;
- investment in and encouragement of active travel and public transport; decreased car ownership; and
- in all but rural areas, encouragement of small car ownership.

Visual appearance:

- reduced damage to verges and the pavement;
- a general statement on visual appearance benefits, without additional detail; and
- reduced cars on the road.

The type of proposal:

- clear guidelines and easy to follow;
- the inclusion of local decision making in the Option 3 proposal;
- Option 3 being a national approach; and
- suggestions that Option 3 would be easier to enforce in towns and city centres and suburban areas.

The environment:

- general environmental benefits, due to less damage to verges and reduced pollution, especially due to the assumption that there would be fewer car journeys, as more people would be encouraged to walk;
- improvements to the public realm; and
- reductions in noise pollution.

Socio-economic factors:

- social benefits, such as children being able to play outside their homes;
- public health benefits, such as encouragement of a healthy lifestyle;
- economic benefits to local authorities, who could use fines as a revenue creator, and who will need to undertake fewer works to fix damaged pavements; and
- economic benefits, including increased tourism and access to local businesses.

Organisations

The **local authority** response saw a benefit from providing a more consistent approach as it would align more closely with the pavement parking legislation in London and Scotland. It was felt that it would also encourage local authorities to review their on-street parking provision and plan locations for pavement parking. This would allow local authorities to manage these sites and use suitable materials to prevent and reduce damage to pavements, reducing maintenance costs.

Option 3 would be easier to implement as it removes the requirement for making expensive TROs.

This option would also reduce the need to provide and maintain posts and bollards, reducing costs. At the same time this removes a further obstruction to pedestrians.

It provides a clear message that can be easily communicated - 'parking on pavements is not allowed' unless signs indicate otherwise. It has benefits in terms of improving the character of areas as less cars will enhance the visual aspect, whilst generating a safer environment (vulnerable pedestrians not having to enter the carriageway to divert around footway parking). The speed of traffic would also reduce if cars were parked on the road.

It would improve accessibility for disabled people, the visually impaired, and people with pushchairs and may encourage more people to make journeys.

Other organisations acknowledged that it could encourage motorists to plan their journeys and be more considerate to vulnerable road users. It will make it clear to motorists that they need to find a designated place to park. It may lead to fewer short car journeys. Prohibiting pavement parking may persuade people to consider other modes of transport, reducing traffic emissions.

Option 3 creates legal consistency and sends a clear, fair message that motorists are not entitled to park on pavements when it suits them. The potential for argument about whether or not obstruction is "necessary" (Option 2) is replaced by the exercise of local authority decision-making which is clearer and more capable of adjustment to the needs of individual areas. This should ensure a high level of compliance.

People with sight loss would be able to plan their route with confidence to avoid pavement parking locations, removing uncertainty from journeys. Vehicles moved to the carriageway would act as chicanes and therefore slow down traffic speeds and improve road safety. It will encourage more walking and cycling, helping to reduce obesity. It would improve the appearance of streets and public places.

Another stated that the law must be accompanied by policies and investment to make non-motorised transport more convenient, safer, and attractive such as fully inclusive cycle hire schemes and cycle parking. It was also recommended that there should be prioritisation of accessible car parking for disabled drivers and short-term parking for key workers.

Other organisations recommended that more public parking should be made available and stated that businesses would need to consider where customers could park.

Other organisations stated that it could encourage delivery businesses to adopt a 'last mile cycle' approach to deliveries. They also suggested that Option 3 would be easier to enforce and could therefore discourage delivery drivers from casually parking on the pavements for a considerable time.

Other specific comments from **other organisations** included: schools should be prioritised for pupil safety; it would help to decarbonise transport; and it highlights government commitment.

Local authorities and other organisations said that Option 3 would foster active management of pavement space e.g. for cycle routes. It could reduce the risk of injury to people using the pavement, reduce pavement related tripping accident claims and reduce the costs of repairing footways.

Disadvantages

Individuals

Many responses noted concerns for access emerging from Option 3. Specifically, that driver access would be reduced, with removal of pavement parking meaning residents and visitors would lack parking outside their homes. A lack of parking in close proximity to a place of residence was thought to be especially detrimental to those with disabilities or those using a pushchair and to EV charging. As a result of parking being removed, responses suggested that alternative parking provision and insufficient public transport, especially in rural areas, would need to be addressed, including ensuring alternatives are affordable.

Furthermore, the spill of parking into the road, in more inappropriate places, or into other areas was of concern for driver access, and a substantial minority raised concerns for increased congestion and journey time, especially for emergency services and deliveries.

Pedestrian and cyclist access was also raised as a concern by a small minority, especially in areas where pavement parking would be permitted, as vehicles would still be able to park on the pavement and signs and road markings may cause pavement clutter. Responses noted that these concerns were likely to be greater in rural areas, due to an assumption that permitted pavement parking would be more frequent.

A substantial minority or less of responses noted the following disadvantages of Option 3 (in order of prevalence):

Enforcement concerns:

- overall concern for enforcement being difficult;
- cost and resources required for enforcement;
- enforcement would not be delivered uniformly across areas, or would not be undertaken at all;
- difficulty enforcing the 20-minute loading / unloading exemption; and
- a concern that the proposals will not act as a deterrent to pavement parking.

Socio-economic factors:

- negative economic impacts, including on business and tourism, due to reduced vehicular access, with tourism impacts noted specifically in rural areas;
- fines would have a negative financial impact on individuals, and, as noted by a very small minority of responses, could just be used by the relevant local authority to raise revenue;
- homeowners could see reductions in property value, due to reduced parking outside their homes;
- increased anti-social behaviour from individuals choosing to use pavements as a social space; and
- increased theft and damage of vehicles and their contents, as cars can no longer be parked in plain view of a property.

Driver confusion / dissatisfaction:

- driver dissatisfaction / irritation / disputes; and
- confusion over rules, especially for those unfamiliar with the area.

Visual blight:

- general concern for visual blight; and
- in areas where pavement parking is permitted, impacts on the character of the area due to signage and road markings and ongoing pavement parking and damage.

Delivery concerns:

- anticipated lack of local decision making;
- long timescales are anticipated;
- costs and resources to deliver; and
- suggestions that exemptions make the proposal ineffective.

Road safety:

- general road safety concerns, including: reduced driver, pedestrian and cyclist visibility due to increased cars on roads; and increased risk of road accidents.

Environmental concerns:

- land use, including front gardens and surrounding fields, and pollution associated with the delivery of alternative parking provision;
- increased car use, and pollution due to longer time spent looking for a parking space; and

- reduced access for low emission vehicles.

Organisations

Overall **local authorities** stated that more resources may be required if Option 3 is preferred, compared to Option 2 which appears easier to adopt. They suggested that a national prohibition was inflexible and is more suited to urban areas at present but could be expanded in future to other areas (rural and suburban) if necessary. The impact of applying Option 3 in rural areas is unknown especially where civil parking enforcement is not in place. They expressed concerns that a blanket approach could potentially alienate communities. It may be difficult for the public to understand the rationale for the prohibition on certain roads especially if the numbers of pedestrian movements observed are low. It was requested that guidance and legislation be clarified to ensure the rules and definitions such as 'what is essential pavement parking' are clearly understood by all. A behavioural change about pavement parking would need to be encouraged along with a move towards a more sustainable society.

Concerns were also raised by **local authorities** regarding the building of new developments. They said that new build properties have insufficient provisions for parking and therefore place further pressure on the availability of parking in the local area. This could lead to displacement of parking and increase the levels of air pollution.

Local authorities generally said that implementing Option 3 would be a substantial task requiring significant funding which they do not have. External funding and support from government would be required to cover the additional costs associated with adopting a national prohibition. Additional costs mentioned included: a review of the road network (roads vary in width and characteristics along their length so this has the potential to be extremely time consuming/resource intensive); the implementation of signs and bay markings to show where pavement parking would still be allowed (and their continued maintenance); a need for new parking restrictions to be installed to address narrower roads and enable traffic flow to continue (i.e. to stop cars moving off the pavement and parking on the road); need to strengthen the pavement where pavement parking was to be allowed; additional resource for enforcement, especially in rural areas; investment in new parking provisions such as car parks or special bays where cars park diagonally to create more parking; and use of camera enforcement. They also suggested that a review of TSRGD and the appropriate distances to repeat signage may be required.

Local authorities suggested that although Option 3 could eventually provide a very long-term solution it may have an unintentional impact on the environment. Careful planning of parking and public transport solutions would be required to mitigate any such impact. However, it was recognised that it may not always be possible to design an appropriate solution and obtain local community consensus for implementation. A national prohibition would be a huge logistical burden and may displace parking (leading to greater demand for additional parking provision at the expense of green space or amenity land) or prevent access for emergency services or residents where pavement parking was not previously problematic. Forcing vehicles off pavements could obstruct the roads. New signage and bay markings would lead to more street clutter detracting from the street scene. Additional signs in sensitive heritage areas, such as historic towns, would impact upon the aesthetic quality of the place.

It was stated that a total pavement parking prohibition could remove the flexibility to accommodate spikes in parking demand that comes with some community events, festivals, etc. The prohibition of pavement parking could mean that, for such events, there would be less capacity for vehicle parking unless alternative parking solutions were found. Option 3 could lead to an overall reduction in amount of kerb space available for parking due to introduction of parking restrictions to manage traffic flow and access.

Commercial businesses were concerned with the high cost associated with implementing a national prohibition. They also mentioned that choosing this option could inadvertently lead to additional sign clutter and a lack of parking provision.

They believed that alternative methods to implementing new laws should be employed such as introducing higher curbs, bollards and pedestrian zones. A blanket prohibition is a one size fits all approach. It might create some difficult passing situations on the road, whilst keeping footways clear for the pedestrians. It could lead to more illegal or inconsiderate parking on roads.

One **commercial business** stated that numerous exemptions may need to be made by local authorities permitting pavement parking in areas where carriageway widths do not support local parking demand. Permissible pavement parking would increase access issues for utility companies as there are many utility assets installed in pavements and verges and this may result in significant delays and increased costs. It would also impact the cost and pace of full fibre network delivery and more layers of administration (e.g. lengthening the process for suspending parking bays). It was also suggested that implementing exemptions by administrative resolutions does not include consultation of apparatus owners or take into consideration the substantial impacts on apparatus and service.

Commercial businesses also noted that there would be additional costs associated with upgrading the pavement construction to withstand vehicles where they are permitted or repairs would soon be necessary.

Other organisations stated that a national pavement parking prohibition would attract significant opposition from people who believe it is their right to drive anywhere and park close to their destination.

They were concerned that applying a blanket prohibition on pavement parking may be disproportionate. They said that preparations in Scotland for a similar prohibition was already raising concerns around parking displacement and the additional burden on local authorities.

It was recommended that where there are no alternative options for vehicles to unload goods, support would be required. It was suggested that special delivery parking bays should be created.

As Option 3 would require primary legislation, it would take some time to implement and local authorities could potentially be left for some years with no enforcement options. Most authorities would need to identify areas where pavement parking must be permitted and would need to undertake consultation exercises. Local authorities could be overwhelmed with requests from residents for exemptions.

Others said the exemptions mean that disabled people and pushchair users would still be disadvantaged. Traffic flow should not be prioritised over pedestrian movements in narrow streets.

It would also involve local authorities taking costly and resource intensive steps to mitigate against its effects in different areas and increase the regulatory burden on local authorities. For example, taking steps to introduce permitted parking (with the signs and lines required to do this) in rural areas – where pavement parking may not have as much impact – would divert resources away from more pressing demands on transport budgets.

Other comments from **other organisations** included: it would allow motor-lobby councils to skirt the prohibition at their discretion; it would be a system that requires an element of compromise; it would cause a reduction in parking provision and people parking much further away from their homes; people will spend more time in their vehicles looking for somewhere to park which will have emissions/environmental implications; pavement parking signs must be accompanied by marked parking bays, otherwise cars park at any angle and the pavement is often impassable; we should not be relying on councils, instead the police should be given the powers to act.

All types of organisations thought a nationwide prohibition does not allow local authority discretion or flexibility in individual situations. It could have an adverse economic impact through a loss of business and reduced footfall. There could be a reduction in passing trade for retail businesses for example newsagents and convenience stores.

Do you believe Option 2 would have an impact on the environment?

Table 12: summary of responses to question - Do you believe Option 2 would have an impact on the environment?

	Yes	%	No	%	Don't know	%	Response Total
Individuals	4778	32	5021	34	4969	34	14768
Local authorities	70	45	51	33	33	21	154
Commercial businesses	16	36	16	36	12	27	44
Other organisations	98	50	50	25	50	25	198

What impact?

Individuals

Positive Impacts

When asked about the impact of Option 2 on the environment, many responses suggested it would have a positive impact. The vast majority of the views expressed in the responses fell into three broad categories (each expressed in many responses):

- Option 2 would lead to decreased car use and/or ownership;
- Option 2 would lead to an increase in active travel, including walking, cycling, and use of public transport; and
- Option 2 would lead to a decrease in pollution.

Other positive environmental impacts of Option 2, each expressed in a small minority of responses, include:

- improved physical appearance of the environment;
- decreased congestion;
- benefits to wildlife;
- fewer necessary pavement works; and
- increased use of environmentally friendly modes, including for deliveries.

A small minority of responses also expressed that Option 2 would only have a positive impact on the environment if delivered alongside active travel solutions.

Other positive impacts of Option 2, not relating to environmental benefits, were also identified in a substantial minority of responses. Many of these responses related to the road safety benefits of the proposal, and a substantial minority suggested Option 2 would have accessibility benefits, or reduce damage to the kerb, pavement, or road. Also suggested, at a lower frequency, was that Option 2 would lead to reduced pavement parking.

Other suggestions as to the positive impacts of Option 2, each made in a small minority of responses, included:

- public realm benefits;
- public health benefits;
- visual appearance benefits;
- social benefits;
- increased investment in alternative parking or transport options;
- allowing local decision making;
- improved access for vehicles, including emergency services;
- fewer unused / unlicensed cars taking up parking spaces;
- providing clear and easy to follow guidelines;
- reducing damage to buildings; and
- prioritising pedestrians over car users.

Negative Impacts

Conversely, a substantial minority of responses suggested that Option 2 would have a negative impact on the environment. The vast majority of views expressed in these responses fell into two broad categories, each expressed in many responses:

- Option 2 would lead to increased pollution, for example through manufacture of signs or increased development of alternative parking provision; and
- Option 2 would lead to increased congestion and journey times.

Other negative environmental impacts of Option 2, suggested at a lower frequency, included:

- increased car use, due to people having to drive around looking for an appropriate place to park;
- negative impacts on wildlife and greenery, especially if parking on verges is still permitted;
- increased flood risks due to the development of new parking; and
- reduced ownership of electric vehicles, due to reduced access to on-street charging from homes without drives.

A small minority of responses did not specify why they felt Option 2 would have a negative impact on the environment, and a much smaller number of responses expressed the opinion that Option 2 would have the same environmental impact as unregulated parking.

Other negative impacts of Option 2 were also identified in a small minority of responses. The vast majority of these responses fell into four broad categories:

- Option 2 would have a negative impact on the physical appearance of the environment due to cars still being parked sporadically on pavements. A very small minority also showed a concern for the impact of signage and road markings under Option 2;
- concerns over implementation and/or enforcement of Option 2;
- concerns over the impacts of the reduced availability of parking; and
- accessibility concerns.

Other negative impacts of Option 2, each expressed in a substantial minority of responses or less, included:

- concerns over ongoing damage to the pavement, kerb, or road (substantial minority);
- road safety concerns, due to reduced pavement access and impact on line of sight (small minority);
- social concerns (small minority);
- economic impacts of reduced access to local amenities (small minority);
- public realm concerns (small minority);
- public health concerns, due to reduced pavement space in light of social distancing (small minority);
- a decrease in active travel due to reduced pavement space (small minority);
- an increase in noise pollution (small minority); and
- an increase in anti-social behaviour / crime (small minority).

Organisations

Local authorities stated that adopting Option 2 would not require additional road signage to prohibit or permit pavement parking.

Prohibiting pavement parking where streets are narrow may improve the air and visual quality of the local environment by forcing drivers to park elsewhere thus enabling free traffic flow on a more regular basis.

Other **local authorities** said it could cause parking displacement into areas that do not currently have a problem with pavement/footway parking. This could result in disputes and conflicts within local communities and environmental damage in those areas.

Some **local authorities** suggested that if Option 2 was the preferred choice, the ambiguity surrounding what would be classified as an 'unnecessary obstruction' would make it difficult to enforce and it would have no significant impact on the environment.

Other **local authority** comments included: it could discourage multiple car ownership due to a lack of parking spaces and provide opportunities to improve biodiversity; may lead to obstruction of carriageways and therefore increase emissions as tail backs occur.

Commercial businesses stated that Option 2 would hopefully help to get more people using public transport. It may also make drivers consider purchasing smaller vehicles in the future.

Other **commercial businesses** said that people will shop outside of towns at the larger shopping centres where adequate parking facilities are available. This could cause high street shops to close.

Other organisations stated that it would help reduce damage to the historic environment and improve the aesthetic appearance.

It was suggested that it would increase accessibility of green space and help historical areas in retaining green flag status. It may also deter people from owning more than one vehicle.

The measure was seen to support the government's objective to make walking (and cycling) the natural choice for short journeys contributing to the decarbonisation of transport – as set out in the 'Cycling and Walking Investment Strategy'¹; 'Decarbonising Transport: Setting the Challenge'² and; 'Gear Change: a Bold Vision for Cycling and Walking'³.

However, some **other organisations** believed Option 2 would not cause people to significantly reconsider how they travel. Option 2 was subjective and relies on interpretation by CEOs as to what constitutes 'obstructing a pavement'. They believed

¹ See <https://www.gov.uk/government/publications/cycling-and-walking-investment-strategy>

² See https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf

³ Ibid. <https://www.gov.uk/government/publications/cycling-and-walking-plan-for-england>

some people would consider they had a 'necessary' reason to obstruct the pavement. Others said there would be no impact because it would not be enforced.

Local authorities and commercial businesses thought that it could lead to a reduction in the availability of car parking spaces. This could result in many drivers driving further and longer to find spaces and possibly lead to greater CO2 emissions. Furthermore, the construction of new car parks could inadvertently impact the biodiversity in some areas as new car parking provisions may be built in open green spaces.

Some **local authorities and other organisations** believed that choosing Option 2 would still lead to additional street clutter and road markings which would require maintenance. This could inadvertently have an impact on the visual aspect of the environment. Others said there would be fewer signs needed for exemptions than Option 3. It would improve the aesthetic environment by removing unsightly vehicles and unsightly damaged pavements and verges.

Local authorities and other organisations stated that the positive impact would be limited by the degree to which local authorities enforced the measure.

All types of organisations believed that choosing Option 2 would create a safer environment for pedestrians and improvements in wellbeing. It may deter people from making car journeys if parking is difficult and there is the threat of receiving a Penalty Charge Notice. This could help promote active travel by encouraging the use of public transport, walking and cycling. This change in behaviour could lead to a reduction in noise and air pollution.

However, **all types of organisations** also said that forcing vehicles to park wholly on the carriageway could lead to impeded traffic flow, localised traffic congestion hot spots and an increase in noise and air pollution.

All types of organisations recognised that partially prohibiting pavement parking could prevent damage to pavements and grass verges and lead to an improvement in roadside habitats. Less damage to pavements would also lead to a reduction in trip hazards and claims. However, others said Option 2 would still allow vehicles to park on pavements and grass verges, affecting flora and fauna (wildlife corridors).

Do you believe Option 3 would have an impact on the environment?

Table 13: summary of responses to question - Do you believe Option 3 would have an impact on the environment?

	Yes	%	No	%	Don't know	%	Response Total
Individuals	7477	51	3794	26	3354	23	14625

Local authorities	102	67	24	16	26	17	152
Commercial businesses	25	58	8	19	10	23	43
Other organisations	131	66	28	14	40	20	199

What impact?

Individuals

Positive impacts:

When asked about the impact of Option 3 on the environment, the majority of responses suggested it would have a positive impact on the environment. Whilst a substantial minority of responses did not specify what kind of positive impact Option 3 would have, the vast majority identified specific environmental impacts which fell into three main categories (each expressed in many responses):

- Option 3 would increase active travel, including walking and cycling;
- Option 3 would lead to a decrease in car use and/or ownership, partly due to the decrease in available parking; and
- Option 3 would lead to a general reduction in pollution.

Other suggestions as to the positive impacts of Option 3 on the environment (each expressed in a small minority of responses) included:

- decreased congestion;
- positive impacts on wildlife;
- less works required to fix damaged pavements;
- reduced damage to verges, aiding in water management; and
- an increase in the use of environmentally friendly modes.

A small minority of responses also felt that the positive environmental impacts of Option 3 would be conditional on Option 3 being delivered alongside investment in active travel solutions, public transport, and/or public amenities.

Negative impacts:

Conversely, a substantial minority of responses identified negative environmental impacts of Option 3. Many of these identified increased pollution as a negative environmental impact, including from the manufacture and installation of signage. A substantial minority of the negative responses identified increased congestion and increased journey time. Other negative environmental impacts identified less frequently (each arising in a small minority of responses) included:

- negative impacts on wildlife and greenery which may be destroyed in the development of alternative parking provision, or by drivers parking in green spaces;
- increased flood risk from the development of alternative parking provision, specifically due to increased hard surface areas, such as driveways, increasing chances of surface flooding and sewage/water run off issues;
- reduced ownership of electric vehicles due to reduced access to EV charging outside of homes without parking provision;
- exemptions in Option 3 allowing pavement parking to continue; and
- noise pollution concerns.

Organisations

Commercial businesses expressed concern that Option 3 would penalise businesses that rely on passing trade, especially in town centres. This could inadvertently spell the end for certain town centres.

Another said Option 3 increased the potential for abortive visits on utility works. Wasted truck rolls would increase carbon footprint. There was an increased possibility that there would be more damage to apparatus, footways and reinstatements. These would all require additional maintenance involving vehicle movements and materials which could lead to an increase in carbon footprint.

Commercial businesses also thought there would be a reduction in shorter length car journeys and greater use of public transport.

Other organisations said that a national prohibition would create room for more public EV charging points for electric vehicles. Vehicle charging points could be placed on charge poles or within the pavement.

Other organisations were of the view that a pavement parking prohibition could provide the impetus for the development of better parking infrastructure in the future.

It was also thought that clearer pavements would help facilitate better pavement cleaning. This was especially relevant in the autumn when fallen leaves are a hazard for pedestrians.

There was a view that Option 3 supported the government's objective to make walking (and cycling) the natural choice for short journeys contributing to the decarbonisation of transport – as set out in the 'Cycling and Walking Investment Strategy'⁴; 'Decarbonising Transport: Setting the Challenge'⁵ and; 'Gear Change: a Bold Vision for Cycling and Walking'⁶.

Local authorities and other organisations suggested that more demand on limited parking provisions could make people reassess the number and size of vehicles they need and encourage greater use of public transport. This could lead to a reduction in car

⁴ See <https://www.gov.uk/government/publications/cycling-and-walking-investment-strategy>

⁵ See https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf

⁶ Ibid. <https://www.gov.uk/government/publications/cycling-and-walking-plan-for-england>

ownership and journeys in some places. However, it was also recognised that car ownership is high in some areas due to inadequate public transport.

Local authorities and other organisations were concerned that a lack of parking spaces could cause parking displacement which may result in vehicles parking in places where it does not currently occur such as grass verges. Conversely, there would be an improvement in the condition of roadside habitats if verges were included in the prohibition.

Local authorities and other organisations said that additional sign clutter would impact the environment. Unsightly posts and signs are detrimental to local environments and could impede vulnerable road users. Local authorities stated that there are already significant levels of street furniture in many areas and that they have started making efforts to reduce this where possible.

All types of organisations said that it would improve access to walking routes allowing pedestrians to move around the environment more easily and safely. It could help improve quality of spaces and reduce damage to the historic environment.

It may also support a behavioural change and encourage active travel with people opting to walk or cycle more, rather than drive, leading to improved public health and a reduction in emissions. A more sustainable transport system is the way forward and a national prohibition could provide an opportunity to reassess the way public transport use is encouraged. For example, park and ride might become a more popular method of access into cities. Prohibiting pavement parking would also create the demand for appropriate public transport provision. Option 3 would work in unison with redesigning civic spaces to facilitate walking, cycling and discourage private vehicle use where possible.

All types of organisations said that a national prohibition could help reduce unsightly and dangerous pavement and verge damage and therefore require less expenditure on repairs and maintenance. There would also be a reduction in demand for the materials required to undertake the repair (which has a cumulative environmental benefit in terms of energy and emissions spent on sourcing and preparing the product). Planted verges would not be destroyed and would flourish providing vital habitat for wild animals.

All types of organisations said that an England wide prohibition could discourage people from using vehicles, improving traffic flow and air pollution. Conversely, it was thought that more parked vehicles on the carriageway could negatively impact traffic flow and congestion causing localised pollution and carbon emissions from vehicles. Idling vehicles or vehicles driving further in search of an acceptable place to park may also result in increased traffic congestion and air and noise pollution.

All types of organisations were concerned that a blanket pavement parking prohibition could cause problems in residential areas with narrow roads where properties have no off-road parking. It could lead to the conversion of front gardens into hard standing parking which could impact on wildlife and on water drainage potentially increasing the risk of flooding. The conversion of green spaces to provide alternative parking could also lead to loss of habitat and biodiversity.

What, if any, other additional vehicles or services would you like to exempt from Options 2 and 3 and why?

Individuals

Of the responses received to this question, many suggested that no additional vehicles to those already specified should be exempt. Some made a comment that there should be a reduction to the list of exemptions, others suggested that only emergency service vehicles should be exempt, and some thought there should be no vehicle exemptions.

In contrast, many suggested additional vehicles and services they would like to be exempt. Of these responses, many supported exemptions for vehicles and services used by individuals with specific needs, such as:

- Blue Badge holders;
- vehicles with elderly/disabled/vulnerable passengers; and
- families with young children.

A substantial minority suggested that there should be more exemptions specifically in relation to residential needs, i.e. for:

- residents (general);
- vehicles for domestic building/maintenance work;
- individuals visiting residents;
- vehicles picking up/dropping off passengers;
- residents with no private parking facilities;
- residential exemptions for overnight parking only;
- residential exemptions when outside own home only;
- residential exemptions due to car insurance concerns; and
- residential exemption for the purpose of car repairs.

A substantial minority suggested that exemptions should apply to vehicles, services or locations relating to health care or medical reasons:

- carers (formal/informal);
- areas surrounding NHS/Social Care premises;
- general Practitioners (GPs)/District Nurses/Midwives;
- those providing Social Care/Mental health services;
- Vets;
- all blood, organ and medicine transport vehicles;
- all vehicles making way for emergency services; and
- RSPCA.

A substantial minority suggested that modes (other than private cars) should be exempt, including:

- taxis/PHVs;
- motorcycles/scooters;

- bicycles;
- mobility scooters;
- coaches/minibuses;
- buses;
- driving instructors;
- car club/car share vehicles;
- rental vehicles;
- vans; and
- animal drawn carts.

A small minority suggested that exemptions should be applicable under specific circumstances, including for:

- vehicles during funerals, weddings and other similar events;
- those taking rest breaks/stopping for personal emergency;
- those stopping during extreme weather conditions; and
- vehicles where the owner is in attendance.

A further small minority suggested vehicles providing the following essential services should be exempt:

- essential council services;
- other emergency services (e.g. mountain rescue, lifeboat, coastguard);
- armed forces;
- civil enforcement officer vehicles;
- Network Rail staff/contractors undertaking emergency work on railway lines;
- National Highways traffic officers;
- vehicles on government business;
- private companies that provide similar services to the council;
- bus shelter cleaning/maintenance (council and non-council); and
- vehicles carrying detained criminals.

Similarly, a small minority suggested that exemptions should apply to vehicles providing the following services:

- all vehicles used for charity purposes;
- key workers – unspecified;
- vehicles on educational visits (e.g. school trips);
- mobile libraries;
- guide dog training vehicles;
- vehicles used for faith/religion; and
- 20-minute exemptions for non-business-related deliveries/loading/unloading.

A further small minority put forward that there should be more exemptions relating to businesses, which included:

- all vehicles for business purposes;
- agricultural vehicles;

- all vehicles selling food (e.g. kebab/burger van);
- cash in transit vehicles;
- skips; and
- journalists and news broadcasters.

Other suggestions made by a small minority were for:

- any vehicle authorised by the council to be parked in a specified place at a specified time for Option 2;
- electric vehicles;
- caravans, horse boxes, mobile homes;
- parking in accordance with a direction given by a Civil Enforcement Officer; and
- automatic cars.

Organisations

Local authorities suggested that the following vehicles or services be exempted:

- diplomatic vehicles;
- wedding/funeral cars and their cortège;
- all blue light emergency vehicles including HM Coastguard, Special Forces (bomb disposal team), military; etc
- consideration should be given to amending the term emergency health care to essential health care and to widen this to support workers, healthcare visitors and personal carers;
- street stalls and market traders;
- cash deliveries for banks, building societies, ATMs;
- vehicles operating within the area defined by a licence issued by the local authority i.e. S169 or 171 of Highways Act 1980;
- vehicles being used for the purposes of traffic/pedestrian/cycle monitoring;
- enforcement action by, or on behalf of, the council. This would allow the local authority to undertake enforcement action (including pavement parking) in remote areas where their patrol vehicle will be with them;
- any vehicle authorised by the council to be parked in a specified place at a specified time;
- delivery of building materials;
- there should be discretion for local authorities to increase the length of time for vehicles such as removal firms e.g. a permit system for longer than 20mins (however pavement parking should only be permitted if there isn't room on the highway for these exempt vehicles);
- a 20-minute exemption for people dropping shopping and other heavy items into their houses;
- dial-a-ride type services;
- visitors – where the household does not own a vehicle or on a case by case basis, rather than a national exemption for visitors;
- “inspection of the highway” for pavement parking;
- a vehicle which has been told to wait by a police constable or has to stop in order to avoid an accident or any related traffic management reason;

- mobility scooters;
- window cleaning vehicles;
- private hire vehicles/hackney carriages - this would only be for the purpose of unloading/loading a fare.

There was also a view that the proposed list of exemptions was too comprehensive and that most did not need to park on the pavement. Including the proposed list would undermine the efficacy of a prohibition. Anyone challenging a penalty should have to prove the necessity of their pavement parking.

Another view was that loading/unloading should not be exempt. Deliveries cause many of the pavement parking problems including obstruction and damage to pavements and verges.

Commercial businesses suggested that the following vehicles or services be exempted:

- Blue Badge holders;
- chemist deliveries;
- nurses/healthcare visitors and registered care workers;
- emergency vehicles;
- local authority and community transport minibus and coach services such as "home to school" and services for disabled passengers;
- Meals on Wheels;
- school buses;
- undertakers;
- vehicles attending domestic emergencies e.g. water, gas, etc;
- delivery/collection/loading/unloading of goods for domestic purposes (such as delivering food/goods, moving home without a removal service, etc);
- telecoms vehicles supporting work on gigabit capable networks.

Other organisations suggested that the following vehicles or services be exempted:

- disabled drivers/Blue Badge holders;
- mobility scooters;
- residents or carers picking up/ dropping off elderly, disabled or otherwise vulnerable people;
- loading/unloading of wheelchair-accessible vehicles;
- volunteer drivers for the elderly in rural areas (an essential service when there are no rural buses);
- doctors and other medical professionals on urgent business;
- health care professionals (not necessarily in an emergency);
- RSPCA;
- other emergency services e.g. mountain rescue, lifeboat, etc;
- motorised bicycles;
- taxi (pick up or drop off);
- utility companies undertaking any statutory obligations;
- cash in transit collections;
- maintenance vehicles (maintenance of property adjacent to the highway);
- DVSA enforcement activity;

- vehicles used in connection with environmental enforcement;
- private vehicles for limited period (e.g. 20-minutes) for loading/unloading;
- community group vehicles (planting verges etc);
- wedding cars;
- street stalls and market traders;
- mobile libraries;
- agricultural machinery and trailers;
- hearses and funeral cars;
- delivery vehicles serving grocery retail premises;
- broken down vehicles;
- military vehicles;
- Meals on Wheels services;
- motorcycles;
- telecommunications engineers;
- local Church officers providing essential pastoral care;
- customers for local businesses/pubs that have no customer parking.

Some **other organisations** said that the list of exemptions was too wide. It was suggested the list be reduced and any exceptions should only be allowed where parking on the road is impossible.

One view was that the default of using part of the carriageway rather than the footway should be promoted. If a motor vehicle cannot stop anywhere other than immediately outside a property with no off-road storage or waiting space, they should default to stopping on the carriageway. This default would be more likely than footway parking to limit the length of a stay and to make it happen at a convenient time, and it would be more likely to cause alternative arrangements to be developed including moving to more suitable premises.

Another said exceptions should not be possible for deliveries in high-traffic or red route areas, except for emergencies or planned and well-publicised roadworks. Another said that exemptions for delivery vehicles and scheduled works must only apply where there is a minimum width for pedestrians to pass by on the pavement.

Another said more than 20 minutes may be needed for deliveries: the time allowed for loading should be sufficient for delivery/collection activity to be efficiently and safely undertaken.

It was suggested that smaller vehicles including cycles, e-cycles, motorcycles and small motor vehicles could be used for many of the functions and scenarios in the exemption list proposed in the consultation. Even loading and delivery can be conducted using smaller devices for the last few metres from where a larger vehicle is parked (for example postal services can be operated using small handcarts, and small cargo cycles).

How do you think "Option 2" will affect people who share the following protected characteristics of eliminating discrimination; advancing equality of opportunity; and fostering good relations between people:

12,539 people answered the questions shown in tables 14 to 16 and 2,842 did not answer. The tables show the breakdown of the answers.

Table 14: summary of responses to question - How do you think Option 2 will affect people who share the following protected characteristics of eliminating discrimination?

	Positively	Negatively	No effect	Don't know	Response Total
age, in respect of:	44.0% (5384)	9.6% (1179)	35.3% (4317)	11.0% (1346)	12226
disability, in respect of:	57.2% (6911)	11.6% (1405)	22.3% (2692)	8.9% (1070)	12078
gender reassignment, in respect of:	7.5% (880)	2.9% (333)	71.4% (8332)	18.2% (2127)	11672
pregnancy or maternity, in respect of:	48.8% (5740)	9.3% (1092)	31.6% (3718)	10.4% (1219)	11769
race, in respect of:	10.4% (1198)	4.1% (471)	71.7% (8291)	13.8% (1597)	11557
religion or belief, in respect of:	7.6% (866)	3.4% (385)	75.4% (8640)	13.7% (1566)	11457
sex, in respect of:	13.4% (1529)	3.5% (406)	70.6% (8079)	12.5% (1428)	11442
sexual orientation to:	6.7% (760)	2.8% (313)	75.9% (8617)	14.6% (1656)	11346

Table 15: summary of responses to question - How do you think Option 2 will affect people who share the following protected characteristics of advancing equality of opportunity?

age, in respect of:	42.3% (5111)	8.2% (989)	37.7% (4550)	11.8% (1419)	12069
disability, in respect of:	54.4% (6473)	10.0% (1187)	25.6% (3049)	10.0% (1194)	11903
gender reassignment, in respect of:	8.3% (958)	2.9% (330)	70.8% (8162)	18.1% (2084)	11534
pregnancy or maternity, in respect of:	45.6% (5304)	8.2% (953)	34.8% (4045)	11.4% (1329)	11631

race, in respect of:	10.7% (1225)	3.8% (430)	71.5% (8164)	14.0% (1605)	11424
religion or belief, in respect of:	7.7% (879)	3.1% (354)	75.3% (8542)	13.8% (1568)	11343
sex, in respect of:	13.3% (1498)	3.6% (405)	70.6% (7977)	12.6% (1418)	11298
sexual orientation to:	6.9% (778)	2.8% (309)	75.7% (8504)	14.6% (1639)	11230

Table 16: summary of responses to question - How do you think Option 2 will affect people who share the following protected characteristics of fostering good relations between people?

age, in respect of:	43.6% (5270)	15.4% (1859)	26.8% (3239)	14.3% (1729)	12097
disability, in respect of:	48.0% (5727)	15.9% (1892)	22.6% (2699)	13.5% (1607)	11925
gender reassignment, in respect of:	10.9% (1258)	5.1% (590)	65.3% (7559)	18.7% (2169)	11576
pregnancy or maternity, in respect of:	41.8% (4881)	10.8% (1260)	33.2% (3871)	14.2% (1658)	11670
race, in respect of:	13.4% (1532)	6.2% (709)	65.3% (7487)	15.1% (1733)	11461
religion or belief, in respect of:	10.4% (1189)	5.1% (582)	69.8% (7951)	14.6% (1666)	11388
sex, in respect of:	14.3% (1624)	5.3% (600)	66.5% (7544)	13.9% (1575)	11343
sexual orientation to:	9.2% (1035)	4.5% (509)	70.7% (7984)	15.7% (1771)	11299

Where you indicated negative impact, describe your reasons why

Individuals

Of those responses that suggested a negative impact resulting from Option 2 on those with protected characteristics, many responses highlighted that the proposals could lead to poor relations, including due to disputes over parking between neighbours and disputes between pedestrians and drivers. Furthermore, a substantial minority or less of responses noted concerns for (in order of prevalence):

Reduced parking being available impacting:

- those with disabilities, particularly mobility impairments;

- the elderly;
- those experiencing pregnancy or maternity;
- the young;
- those following religion or belief;
- those using pushchairs;
- females;
- those from ethnic minority backgrounds;
- low income groups; and
- those with sensory disability.

Reduced pavement access in areas where pavement parking is permitted impacting:

- those with disabilities, particularly mobility impairments;
- age, especially the elderly;
- those experiencing pregnancy or maternity;
- those using pushchairs;
- those with sensory disability;
- those following religion or belief;
- females; and
- based on race.

Biases in enforcement (these groups will be more likely to park on a pavement and be penalised and/or CEOs could deliberately target these groups):

- those with disabilities, particularly mobility impairments;
- the elderly;
- race, especially for those from ethnic minority backgrounds;
- those experiencing pregnancy or maternity;
- the young;
- those following religion or belief;
- females;
- those using pushchairs;
- those identifying as people with gender reassignment; and
- sexual orientation.

Road safety impacting:

- those with disabilities, including both mobility and sensory impairments;
- age, especially the elderly;
- those experiencing pregnancy or maternity;
- those using pushchairs;
- females;
- race, especially those from ethnic minority backgrounds; and
- those identifying as people with gender reassignment.

Fines having a disproportionate impact on:

- all people, regardless of personal characteristics;
- those with disabilities;

- those experiencing pregnancy or maternity; the elderly; and
- low income groups.

LA delivery costs taking resources away from other vital services:

- all people, regardless of personal characteristics.

Organisations

Comments from some **local authorities** included that on the basis of pregnancy/maternity, age and disability, people may need to park close to their homes and may be disproportionately affected by restrictions to pavement parking in certain areas.

Conversely, there was a view that as Option 2 would not be as effective at controlling pavement parking as Option 3, so the elderly and disabled people would continue to be disadvantaged by cars parked on pavements.

As ‘unnecessary obstruction’ is difficult to define. It was said that Option 2 could lead to arguments rather than fostering good relations between people with protected characteristics. Motorists may also consider the loss of parking to be the result of lobbying by disability pressure groups.

Option 2 could affect religion/belief groups. Where there is limited parking, faith centres may see a reduction in visitors if parking is difficult.

Some **commercial businesses** thought that disabled people were more likely to need to park on the footway to reduce walking distance. People with mental health disabilities could also find their condition exacerbated by having further to walk to reach their car.

They also noted that parking on kerbs would affect users of buggies and pregnant women and the elderly were more likely to need to park on the footway to reduce walking distance.

There was a view that people from ethnic minority backgrounds live disproportionately in built-up residential areas so would be impacted more by the reduction in parking provision and enforcement measures.

Some **other organisations** said that a reduction in parking provision could mean disabled residents, the elderly and pregnant women may have to park their vehicles in areas much further away from their homes. Implementing Option 2 could also cause a safety issue for these groups if they have to park on busy roads.

Conversely, where Option 2 allows a considerable range of discretion in enforcement, the impact on pavement parking would be less and those with protected characteristics would continue to be disadvantaged by vehicular obstructions. Removing exemptions would mean people with protected characteristics would benefit more in terms of improvements in access, road safety, air quality, healthy activity, etc.

Similarly, there was a view that motorists would abuse a 20-minute loading exemption and that pavement parking would not be improved for the benefit of those with protected characteristics.

The terminology of Option 2 was ambiguous and would cause problems rather than foster good relations between groups of people.

How do you think "Option 3" will affect people who share the following protected characteristics of eliminating discrimination; advancing equality of opportunity; and fostering good relations between people:

11,301 people answered the questions shown in tables 17 to 19 and 4,080 did not answer. The tables show the breakdown of the answers.

Table 17: summary of responses to question - How do you think Option 3 will affect people who share the following protected characteristics of eliminating discrimination?

	Positively	Negatively	No effect	Don't know	Response Total
age, in respect of:	61.0% (6681)	7.4% (815)	24.2% (2644)	7.3% (804)	10944
disability, in respect of:	69.3% (7593)	8.6% (942)	15.8% (1727)	6.3% (695)	10957
gender reassignment, in respect of:	11.6% (1205)	2.4% (254)	70.7% (7375)	15.3% (1591)	10425
pregnancy or maternity, in respect of:	58.0% (6189)	6.2% (662)	27.5% (2938)	8.2% (878)	10667
race, in respect of:	15.6% (1623)	3.0% (309)	69.2% (7215)	12.3% (1284)	10431
religion or belief, in respect of:	11.8% (1226)	2.9% (301)	72.9% (7560)	12.4% (1289)	10376
sex, in respect of:	19.3% (2002)	2.6% (269)	66.9% (6954)	11.2% (1169)	10394
sexual orientation to:	10.8% (1115)	2.4% (244)	73.2% (7583)	13.6% (1412)	10354

Table 18: summary of responses to question - How do you think Option 3 will affect people who share the following protected characteristics of advancing equality of opportunity?

age, in respect of:	59.8% (6465)	6.5% (705)	26.0% (2810)	7.7% (829)	10809
disability, in respect of:	68.0% (7379)	7.4% (804)	17.9% (1939)	6.8% (733)	10855
gender reassignment, in respect of:	12.1% (1250)	2.3% (241)	70.4% (7264)	15.2% (1564)	10319
pregnancy or maternity, in respect of:	55.7% (5886)	5.5% (582)	30.1% (3184)	8.6% (909)	10561
race, in respect of:	16.0% (1649)	2.8% (291)	68.8% (7112)	12.4% (1277)	10329
religion or belief, in respect of:	12.1% (1250)	2.6% (273)	72.6% (7476)	12.6% (1303)	10302
sex, in respect of:	19.5% (2013)	2.6% (263)	66.6% (6857)	11.3% (1165)	10298
sexual orientation to:	11.2% (1150)	2.3% (239)	72.7% (7470)	13.8% (1413)	10272

Table 18: summary of responses to question - How do you think Option 3 will affect people who share the following protected characteristics of fostering good relations between people?

age, in respect of:	55.7% (6041)	9.7% (1050)	23.5% (2549)	11.0% (1196)	10836
disability, in respect of:	60.4% (6550)	10.4% (1133)	18.7% (2029)	10.4% (1132)	10844
gender reassignment, in respect of:	15.2% (1574)	3.8% (395)	64.9% (6730)	16.1% (1667)	10366
pregnancy or maternity, in respect of:	51.5% (5461)	7.0% (737)	29.8% (3157)	11.7% (1242)	10597
race, in respect of:	18.6% (1932)	4.4% (454)	63.5% (6595)	13.6% (1410)	10391
religion or belief, in respect of:	15.3% (1578)	4.2% (430)	66.8% (6911)	13.8% (1423)	10342
sex, in respect of:	20.6% (2137)	3.9% (403)	62.5% (6478)	12.9% (1339)	10357
sexual orientation to:	14.1% (1461)	3.6% (369)	67.5% (6971)	14.8% (1529)	10330

A total number of 11301 people answered this question, and 4080 did not.

Where you indicated negative impact, describe your reasons why

Individuals

Of those responses that suggested a negative impact on those with protected characteristics resulting from Option 3, many responses highlighted that the proposals could lead to poor relations, including due to disputes over parking between neighbours and disputes between pedestrians and drivers. Furthermore, a small minority of responses noted concerns for (in order of prevalence):

Biases in enforcement (these groups will be more likely to park on a pavement and be penalised and/or CEOs could deliberately target these groups):

- those with disabilities, particularly mobility impairments;
- the elderly;
- those experiencing pregnancy or maternity;
- race, including for those from ethnic minority backgrounds;
- those following religion or belief;
- females and those identifying as people with gender reassignment; and
- sexual orientation.

Reduced parking being available impacting:

- those with disabilities, particularly mobility impairments;
- age, especially the elderly;
- those experiencing pregnancy or maternity;
- those following religion or belief;
- those using pushchairs;
- race, especially those from ethnic minority backgrounds;
- low income groups;
- females and those identifying as people with gender reassignment; and
- sexual orientation.

Road and personal safety, due to reduced pavement access where pavement parking is still permitted and/or having to park further away from destination, impacting:

- all people, regardless of personal characteristics;
- those with disabilities, including both mobility and sensory impairments;
- age, especially the elderly;
- those experiencing pregnancy or maternity;
- those using pushchairs;
- those following religion or belief;
- females and those identifying as people with gender reassignment;
- race; and
- sexual orientation.

Fines having a disproportionate impact on:

- all people, regardless of personal characteristics;
- low income groups;
- age, especially the very young and elderly;
- those with disabilities; and
- those from ethnic minority backgrounds.

LA delivery costs taking resources away from other vital services:

- all people, regardless of personal characteristics;
- the elderly; and
- those with disabilities.

Organisations

A **local authority** suggested that on grounds of age, disability or maternity, people may need to park close to their destination.

It was stated that the further signage required for Option 3 could create an additional obstruction on the pavements to wheelchair users and the visually impaired.

It was also suggested that parking on the carriageway could impact on disabled people who rely on level access to transfer to a wheelchair. A change in level from highway to pavement may create difficulty or prevent a safe transfer.

Good relations could be affected if motorists consider the pavement parking prohibition to be the result of lobbying by disability pressure groups.

Some **commercial businesses** thought that disabled people were more likely to need to park on the footway to reduce walking distance. People with mental health disabilities could also find their condition exacerbated by having further to walk to reach their car.

They also noted that parking on kerbs would affect those pushing buggies and pregnant women and the elderly were more likely to need to park on footway to reduce walking distance.

There was a view that people from ethnic minority backgrounds live disproportionately in built-up residential areas so would be impacted more by the reduction in parking provision and enforcement measures.

Some **other organisations** also commented on problems for elderly and disabled residents potentially having to park much further away from their homes. A disabled person could also be negatively impacted if services like Ring and Ride/dial a ride/ patient transport could not park on the pavement to pick up/drop off. Special provision for Blue Badge holders should be considered.

An alternative view was that people with protected characteristics were more likely to benefit from access to pavements offered by the proposed measures but would remain disadvantaged by the exemptions that might be permitted. Removing the exemptions

would mean people with protected characteristics would benefit more in terms of improvements in access, air quality, road safety, healthy activity, etc.

Any other comments?

Individuals

Option 1

Responses relating to Option 1 occurred at slightly lower frequency than responses relating to Option 2, and a much lower frequency than Option 3. The most common response relating to Option 1 was general support. A slightly smaller number of responses expressed a general rejection of Option 1.

Option 2

A small minority of all responses related to Option 2. The most common response being support of Option 2, especially in relation to its consistent guidance and positive impact on accessibility. A small minority of responses supporting Option 2 were conditional on:

- allowing exemptions for certain roads;
- requiring a defined pavement width to remain accessible;
- high and/or frequent penalties;
- Option 2 only being implemented in rural areas; and
- Option 2 only being implemented in urban areas.

Responses rejecting Option 2 occurred at a slightly lower frequency, with the vast majority of these responses outright rejecting Option 2, and a small minority specifying that they felt Option 2 was too subjective, or that it should not be implemented in rural areas.

Made at a much lower frequency were suggestions in relation to the delivery of Option 2, including:

- Option 2 should include residential exemptions by default;
- measures should be put in place to prevent over-enforcement;
- enforcement for non-residents should be lenient; and
- enforcement should not be outsourced.

Option 3

The majority of responses about Option 3 were in support. Of the responses in support of Option 3, the vast majority offered outright support, especially in regard to road safety and accessibility benefits. A small minority of the supportive responses offered support for Option 3 with an inclusion of clear limits on permissible pavement obstructions in the legislation.

A much lower frequency of responses relating to Option 3, although a substantial minority, rejected Option 3. The vast majority of these responses rejected this option outright, especially due to a view that pavement parking is necessary, and concerns over enforcement.

A substantial minority of responses relating to Option 3 included specific comments relating to various aspects of Option 3. These responses are summarised below:

Exemption Comments

- rejection of a 20-minute loading / unloading exemption;
- rejection of all exemptions;
- rejection of local authority exemptions;
- only emergency vehicles should be exempt;
- support for reducing the number of exemptions;
- ensure there is a clear process for exemption applications;
- residential exemptions should be included; and
- against exemptions for those with disabilities.

Suggestions to be delivered alongside Option 3

- delivered alongside alternative parking, including for business;
- delivered alongside affordable public transport;
- delivered alongside improved pavements/pavement building; and
- delivered alongside measures to better enforce property boundaries.

Enforcement of Option 3

- general concerns around enforcement; and
- support for citizen enforcement.

Option 3 should be broadened

- to include obstructions to cycle lanes/cycle paths/cycle ways;
- to include other obstructions of the pavement (e.g. wheelie bins; EV charge points);
- to include obstructions to verges/grassed areas; and
- to include all public and private roads.

Implementation of Option 3

- lay out clear timescales for the implementation of Option 3;

- ban use of mobility scooters on road in areas with pavement parking prohibition;
- consult with residents prior to implementation;
- do not include grassed verges; and
- implement Option 3 as quickly as possible.

Other Measures

A substantial minority of the responses included suggestions for alternative measures to be implemented in place of the proposed options. Many of these responses supported the introduction of measures to reduce car usage or ownership, especially through investment in public transport, walking, and cycling. A substantial minority included suggestions to increase the amount of available private residential and public parking provision. Measures to better enforce other offences were suggested at a similar frequency, with enforcement of pavement cycling and parking offences being mentioned most frequently. A substantial minority of responses included a suggestion to make better use of existing parking, especially through altering the layout of existing parking.

Other suggestions made at a lower frequency, mentioned in a small minority of responses each, included:

- road infrastructure changes, such as road widening or reinforcement;
- measures to support the use of more environmentally friendly modes, such as electric vehicles and bicycles;
- launching an education campaign on considerate parking and air quality;
- increasing the number of one-way streets;
- measures to improve road safety;
- measures to improve accessibility;
- suggestions that the government should follow examples of managing parking in other countries;
- supporting drivers' abilities to use common sense;
- removing low traffic neighbourhoods;
- measures to increase trees/greenery;
- measures to manage population size;
- introduction of affordable gyms;
- introduction of a delivery vehicle tax to fund pavement repairs;
- introduction of motorised walkways;
- adjusting compensation regulations for trips/falls;
- measures to allow social distancing;
- restrictions on the use of mobility scooters/invalid carriages;
- measures to prevent destruction of wildlife; and
- giving pay rises to key workers.

Organisations

Final comments made by **local authorities** included:

- will there be sufficient land to provide parking for every car displaced from a street?

- the demand for parking needs to be addressed. The careful balance between parking, active travel provision and public transport accessibility will vary from place to place and may require a phased approach, to keep street allocation in step with lowering car ownership and car usage levels. However, it was recognised that the introduction of a national pavement parking prohibition could potentially encourage the provision of measures to help improve sustainable and active travel;
- removing pavement parking will need to be addressed at both a national and local planning policy level. New housing developments must take this into account and ensure sufficient parking provision and alternative sustainable transport alternatives. Some said that to ensure the design of developments and parking standards do not exacerbate pavement parking issues, national guidance should be provided regarding planning policy and carriageway widths;
- these measures could lead to abuse and assault of CEOs, and an increase in neighbour disputes. Anti-social parking may be a consequence if a lack of parking space leads to drive crossings and garages being obstructed by parked vehicles or overspill into neighbouring areas;
- to be effective the government needs to inject the necessary resources. Support should be provided to local authorities to enable both assessment of current on-street parking and implementation of appropriate measures to facilitate permissive pavement parking where required. Enforcement could be very expensive in large rural areas compared to a more compact metropolitan authority. Penalty levels should be set locally to cover enforcement costs;
- camera enforcement would assist with the cost of enforcement, especially out of hours. It was also suggested that there should be joint enforcement between the local authority and Police;
- there was a call for a national campaign highlighting the new enforcement powers, aimed at changing current attitudes and behaviour with regards to pavement parking. Without a strong publicity and enforcement campaign it would generally be ignored. The government would need to be engaged with this process;
- there was a call to ensure a reasonable timescale by which to undertake street assessments and surveys necessary to introduce formal controls and sufficient financial resource to enable this to be delivered alongside normal parking management service delivery. This period would also need to allow for adequate consultation with stakeholders to identify problem streets and to decide whether to take alternative appropriate parking control measures. Consultation would also be needed on a clear enforcement protocol clearly defining what would and would not be allowed;
- it was said that some levels of pavement parking will need to be permitted in suburban areas but a total prohibition may be possible in city centres unless for maintenance, repairs, etc. Some very rural areas have no public transport so cars are a necessity to access local amenities. Additionally, some towns consist of a more ageing population and are geographically located in hilly areas which may not be conducive to cycling;
- some would like to see new council powers extended to all forms of obstructive parking, including near junctions in the carriageway;
- it was suggested that legislation is conflicting in so far as driving on a pavement is illegal, but parking on a pavement outside London is not;
- it was recommended that the Department should consider ways to help minimise the impact of additional sign clutter and road markings especially in sensitive

environments such as conservation areas. Measures for reducing signage could include pavement parking permitted zones with an entry sign and exit sign, similar to controlled parking zones;

- some were of the view that the efficiency of a pavement parking prohibition could be undermined if all of the proposed vehicle exemptions are included. Any vehicle used for street works should be included as part of street works permit applications. There were also concerns that exemptions related to larger vehicles such as refuse vehicles could cause damage to pavements and verges. However, consideration should be given to providing adequate disabled access and access for parents with young children;
- it was recommended that the proposed changes to pavement parking should first be piloted across communities comprising of hugely different road networks and built environments. This way local authorities could decide on a local solution on the best way forward based on data gained from the pilot rather than the outcome of this consultation;
- the current TRO process is not fit for purpose. The costs for making TROs are prohibitive and the amount of signs required under the TSRGD conflicts with the commitment of reducing sign clutter;
- with the government's drive towards encouraging more use of electric cars there would be an associated increase in on-street EV charging points which may put pressure on local authorities to allow pavement parking;
- in certain situations where there is sufficient width of pavement, properly constructed insets to accommodate parking could be introduced to the street at intervals to break up lines of parked vehicles. 'Build outs' of the pavement could be included, at the ends of the parking insets, to narrow the street for pedestrians to cross.

Commercial businesses

There were a number of additional comments from **commercial businesses**:

- there is a growing lack of consideration by planners when giving planning consent to developers who insist on creating estates with ridiculously winding and narrow roads, making it not only difficult to navigate, but extremely dangerous for pedestrians. This needs to be addressed - whenever a new road is created, consent should be conditional on it being wide enough for cars to pass when on road parking exists on both sides;
- prohibiting pavement parking would make sense if other parts of the country had London style infrastructure (or population density), but they do not. They rely on dated infrastructure, and easy access to a car fills in the gaps whilst development catches up;
- would it not be more effective to introduce limited parking permit zones or invest in infrastructure to encourage people out of cars and into public transport. Unless there is a very effective public transport infrastructure, people will continue to use cars as their choice of transport;
- the policy will incentivise local authorities to act by providing them with a revenue stream from penalty charges. Councils may use the powers to raise revenue. Those in poorer areas will live in housing where pavement parking is more prevalent and may be affected disproportionately. There should be engagement with people living in these areas;

- publicity would be required to educate drivers about the issues and the selected option. It is also unclear if waiting (driver in vehicle) has been considered in this exercise. Waiting can also be a problem for pedestrians. Firm and clear enforcement is key to any approach;
- more money should be spent now on road and pavement repairs;
- government should think about introducing a cap on new vehicle registrations and new cars should only be registered if an old car is scrapped;
- this will put pressure on vehicle owners in residential areas to provide off-road parking and that involves issues including land drainage and flooding. Grant funding would help. More lay-bys should be provided in rural areas. In town and village centres the obstruction caused by A-boards should be tackled;
- this policy has not been considered holistically in line with other DfT work. In conjunction with Active Travel developments, Emergency Active Travel Fund, Gear Change strategy, and Decarbonisation plans, the proposal to reduce parking adds to a broader picture of war on the motorist. Many drivers are totally reliant on cars as the public transport network is paltry in much of the country away from urban conurbations. This will ramp up costs further for drivers, forcing them to park away from homes or away from their destination, and then be forced to rely on poor connections to complete their journeys. This policy is premature and will be met poorly;
- businesses need to make collections and deliveries. Business vehicles must be permitted to load and unload. The pandemic has demonstrated the need and value of home deliveries;
- the definition of a business vehicle would need to be clearer. It may be difficult to identify a business vehicle with no logos e.g. a food delivery driver;
- pavement parking may also lead to conflicts of interest with Active Travel initiatives - could reducing the width of a pavement for vehicles have a negative impact on potential cycle paths and footway?
- should a general prohibition be implemented, a process needs to exist whereby utility companies become statutory consultees to the change, so that full consideration can be given to the impact on the utility network. It was suggested that utility work would need to be treated in the same way that other highway works are treated under s83-86 of the New Roads and Street Works Act (NRSWA). Agreement should be reached on the measures necessary to allow utility companies to maintain access to their apparatus. In some cases there may be a justification to divert apparatus entirely. Furthermore, if pavement space is allocated for vehicular parking it will increase the over-run of surfaces that were not designed for such wear. Fillets around footway chambers are more prone to damage from significant vehicular over-run and apparatus designed for and currently installed for footway use will be compromised under increased vehicular over-run. This creates additional burdens for utilities under s81 of NRSWA and potential difficulties with reinstatement performance. Any impacts in the latter regard also need to be considered in the context of the Specification for Reinstatement of Highways and the guarantee period for such work. If, following this consultation, the solution taken forward is Option 3, it is particularly important that the exemptions are extended to cover utility companies and their contractors. as all of the legitimate activities of utility companies and their suppliers in building a full fibre network, and in maintaining existing services to the businesses and residences of the UK are not clearly identifiable as street works. Whichever option is implemented, there needs to be robust guidance to ensure that the impacts on the assets and essential activities of utility companies are mitigated.

Other organisations

Additional comments included:

- It was recommended that consideration be given to amending some related legislation to give more enforcement powers to local authorities:
 - Decriminalise 'driving on footways' by amending Section 72 of the Highways Act 1835;
 - Decriminalise the obstruction offence in Section 137 of The Highways Act 1980.
- for the Penalty Charge to function as a sufficient deterrent the value of the PCN should be regularly reviewed;
- councils might need additional enforcement capacity and would have to weigh this against expected income from fines. Councils might need a larger financial settlement to respond to residents' expectations;
- councils should introduce systems whereby the public can report offenders to the local council – online - in a similar way that potholes can be reported. Online facilities should enable the public to submit photos of the offenders for prosecution;
- alongside these proposals, the government should consider a wider scale review of parking and traffic restrictions. Surveying parking provision and digitally mapping all current TROs would facilitate the rollout of autonomous and connected vehicle technologies within the UK;
- there is little quantitative data on the safety implications for pedestrians. It was suggested that the Department considers whether current reporting practices on non-fatal road-traffic collisions are effective;
- pavement parking may amount to a breach of the Equality Act 2010. We need to help drivers consider the impact of parking their vehicle. For the health and well-being of everyone we must reduce private car ownership and make it inexpensive, convenient and attractive for people to travel instead on foot, by bike and by public transport. It is precisely on narrow, terraced streets that people need room to walk unimpeded;
- prohibiting pavement parking is one element in reducing car ownership. Restrictions on pavement parking should go hand-in hand with wider measures to prevent the problem happening in the first place, including:
 - measures to invest in viable, attractive alternatives to car use and car ownership including walking and cycling infrastructure; behavioural change interventions; public transport; park and ride facilities; and car sharing;
 - reversing the trend towards ever larger cars and SUVs which take up more space and render small children invisible and therefore in danger;
 - incorporating off-street loading bays into new office and retail developments;
 - encouraging greater consolidation of deliveries to minimise the number of vehicles servicing residential and commercial areas;
 - greater use of cargo-cycles for last mile deliveries to reduce pavement parking by delivery vans.
- living streets should be encouraged, where there is no distinction between the footway and the carriageway and the conflict between pedestrians and vehicles is resolved by slowing vehicles through creating obstacles including the use of street furniture and parking bays;

- as in Japan, a licence should not be issued without a dedicated parking space;
- the introduction of electric cars has led to a proliferation of unprotected and unmarked trailing leads across pavements, often overnight. This is a clear trip hazard even for sighted pedestrians and should be regarded as an illegal pavement obstruction. As the ownership of electric vehicles is set to increase, this needs to be part of any plan to make pavements safer for all users;
- at local authority level, the issue of pavement parking should not be considered in isolation. It should be part of a broader policy on parking, which includes issues such as use of double yellow lines, neighbourhood parking zones and on and off-street parking charges;
- Option 3 would need to be backed by an effective public education campaign - the sense of entitlement by many motorists is something that needs serious attention;
- the cost of employing sufficient CEOs to deal with Option 2 in a proactive way is unlikely to be cost effective in itself. However, if other Highway Act parking (or even speeding) offences could be dealt with by CEOs the costs could be recovered. Examples of offences currently ignored include:

- parking facing traffic on bus routes;
- parking on yellow lines or on verges inside lines;
- parking too close to or even on road junctions;
- parking across crossing points (including tactile pavement).

- give the Police the Powers to act, especially out of hours;
- these provisions must include land that is not in the ownership or under the control of a local authority. Otherwise organisations responsible for public safety on land adjacent to the highway which is in their ownership but serves as a pavement with full public access, will not be able to make use of the provisions;
- pavement parking tends to obstruct cycleways where they exist. More enforcement is needed where physically-separated cycleways are not in place;
- consideration needs to be given to whether Civil Enforcement can remove a vehicle from a pavement where it would force disabled people into the road;
- the issue of rental e-bikes blocking pavements needs to be addressed as they cause an unnecessary obstruction of the pavement and restrict the movement of disabled pedestrians;
- the current Highway Code text on pavement parking is inconsistent, confusing and dangerous. Section 244 should be changed to "You MUST NOT park partially or wholly on the pavement unless signs permit it" since driving on the pavement is prohibited.

