



# **West Sussex County Council**

## **Integrated Parking Strategy**

**Picture to Insert**

**2020 – 2025**

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## Introduction

***The average car is parked at home for 80% of the time, parked elsewhere for about 16.5% of the time and only used 3.5% of the time. Source – RAC Foundation***

Parking is a big part of all of our lives. It affects where we go, how we choose to get there and how long we end up staying there. Well managed parking can enable a more mobile society and help our local economies grow but poorly managed parking can cause congestion and create road safety problems by encouraging more car use as well as impact adversely on the local economy. People need to be able to make the trips they need to make but without cluttering up the roads and making our cities, towns and villages ugly and hard to get around.

As the Highway Authority for West Sussex, West Sussex County Council has an Integrated Parking Strategy (IPS) that sets out its approach to managing parking. This mainly includes the management and enforcement of on-street parking controls and regulations but it also sets out the County Council's view and role in off-street parking provision, primarily provided by District and Borough Councils, as well as how its approach to parking management relates to other policies and strategies.

The IPS was last updated in 2014 and this latest review, covering the period from 2020 to 2025, seeks to ensure that the County Council's approach to managing parking remains appropriate and effective at meeting the needs of local communities as well as its other objectives.

## IPS Review Aims & Objectives

The aim of the IPS review is to ensure that the supply, regulation, enforcement and cost of all types of parking in West Sussex continues to be managed and controlled in ways which are consistent with the County Council's other transport, economic and environmental policies.

Policies to manage the demand for car use through the control of on-street parking need to be integrated with and supportive of measures to tackle congestion and pollution, promote alternative modes of transport, enhance the economic viability and vitality of town centres and improve road safety and residential amenity.

As a strategic document the IPS will not set out each and every decision or action that will affect car parking in West Sussex but rather set out the basis on which the County Council will make future decisions and what these should achieve.

The specific objectives of the IPS review are to:

- Collate and review the national/local policies and guidance that influence the County Council's approach to parking management in West Sussex. This will form the second part of the IPS document.
- Set out a number of the County Council's parking management policies for the period 2020 - 2025. This will form the third part of the IPS document.

The first part of the IPS document provides some wider context.

# Part 1

## 1. The West Sussex IPS in Context

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The county of West Sussex sits on the south coast of England, bordering Hampshire, Surrey and East Sussex. The city of Brighton & Hove is on its south-eastern boundary. The county covers an area of 2,024 square kilometres and is predominantly rural in character but with some large towns.

West Sussex is made up of seven Districts and Boroughs and operates under a two-tier system of local government. In terms of size, West Sussex County is the 31<sup>st</sup> largest authority in England and Wales.

The majority of the population lives in the four largest towns, Bognor Regis, Crawley, Horsham and Worthing, yet 42% of the county's resident population, and over half of its businesses are located in rural areas. 87% of the rural population live in small towns and villages, with 13% living in hamlets and dispersed farms and houses.

Over half of the land area of West Sussex is designated as protected countryside. This high percentage is due to a large part of the county falling within the South Downs National Park, which cuts a large swathe right across the area, and two other designated Areas of Outstanding Natural Beauty: Chichester Harbour and the High Weald.

The county has good transport links with London. Mainline rail services between Brighton, Southampton and Portsmouth run through West Sussex with direct links to London Victoria and London Bridge. Other direct services to the west link the county with Bath, Bristol and Cardiff.

The M23/A23 corridor runs down the eastern side of the county connecting Brighton with London and the A27 provides east/west links through the coastal towns. Gatwick Airport offers excellent national and international links for residents and is a major source of employment. While the towns of West Sussex are generally well connected, some rural parts of the county remain relatively isolated from the main transport networks of the South East.

Latest population estimates from the Office for National Statistics (ONS) show that West Sussex is now home to a little over 836,000 people. Arun District has the highest proportion of the county's population at almost 19%. Adur, which is also the smallest district, has the lowest at almost 8%. The population of West Sussex is projected to grow from 828,398 in 2014 to 997,684 in 2039, an increase of 169,286 people or 20.4%. District and Borough populations are projected to grow by between 12,971 people (Adur) and 36,569 people (Arun).

The densest areas of population in West Sussex are found in the coastal towns, and the commuter towns of the A23 corridor. Figures from the ONS show that there has been an almost 16% rise in the county population in the 20 years since 1995. The population has increased more rapidly since then, between 1995 and 2005 it went up by a little over 47,000 people but in the following decade it rose

by almost 65,500. Crawley has seen the largest district percentage increase in 20 years, 19.5%, which equates to just over 18,000 people. In the last decade, however, Mid Sussex has seen the largest rise of any other district – an almost 12% increase, equating to an extra 15,000 people in 10 years. On the whole these increases are seen in the large commuter towns in Mid Sussex, Haywards Heath, Hassocks, Burgess Hill and East Grinstead, all of which have good road and rail links to Central London.

There are around 7.4 million square kilometres of roadside and footways in West Sussex, including 15 A roads totalling 504km, 42 B roads totalling 337km, 315 C roads totalling 1000km and 2200km of unclassified roads. There are also 33 miles of cycle path, 735 miles of bridleway, 79 miles of restricted byway and 8 miles of byway. In total there are 855 miles of dedicated routes in West Sussex where pedal cycles may be ridden.

2011 Census records indicate that there are 413,000 cars and vans in West Sussex compared to 346,000 households. 18% of households have no car or van, 43% have one car or van and 39% have two or more cars or vans. Across West Sussex the average number of cars or vans per household stands at 1.34. The car remains the dominant mode of transport for journeys to work with nearly two thirds of people in employment travelling to work by car and the average distance travelled to work being 17km.

Currently, there are approximately 24,500 parking spaces in West Sussex, including over 6,000 which are free. Approximately 15,000 of these spaces are provided within 7 Controlled Parking Zones, located in Billingshurst, Bognor Regis, Chichester, Crawley, East Grinstead, Horsham and Worthing.

## **1.1 Parking Management in West Sussex**

In the 1980s the County Council's approach towards on-street parking was based upon two main criteria, i.e. that:

- (a) action should be justified on grounds of road safety and/or traffic flow; and
- (b) parking regulations should be mainly self-enforcing and require minimal supervision.

In effect, whilst parking problems in residential area were recognised, the difficulties in resolving them were considered to out-weigh the benefits in taking action. This all changed following a major consultation and policy making exercise held in 1988, where a number of issues were raised:

- (i) there was a pressing need for better enforcement of waiting restrictions;
- (ii) the most constructive approach would be better facilities rather than more waiting bans;
- (iii) parking plans were urgently required in most towns; and
- (iv) environmental /amenity (i.e. residential) problems should be considered and tackled.

Accordingly, a more strategic approach to parking was agreed upon, whereby parking plans would address these issues by "having regard to the customer in the vehicle, whether moving or parked, and the needs of other road users and the environmental effects". This would require "the

appropriate level and means of enforcement, to create a sufficient risk of detection to deter offenders.” This approach formed the basis for the first parking schemes in West Sussex, subsequently implemented in Chichester (1990), Bognor Regis (1992), Horsham (a small residents-only scheme, in 1994), and Worthing (1996).

In 1997, a review of the County Council’s On-Street Parking Policies led to the development of the first Integrated Parking Strategy in July 2000. Incorporated within the Local Transport Plan for West Sussex, the strategy sought to reflect national, regional and local policies as well as establish a forward programme for more effective parking management throughout West Sussex at all levels.

Further reviews of the strategy were undertaken in 2007 and 2014.

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## **Part 2**

### **2. Parking Policy Context**

A wide range of national and local policy and guidance documents have helped the County Council to develop its approach to parking management since the first Integrated Parking Strategy was produced in 2000. These documents enable it to understand the current situation, the challenges it faces and the options it has for tackling them. Whilst the County Council is careful to recognise the particular needs of communities within West Sussex, these documents are important as they provide the County Council with the tools it needs to produce the right parking management approach for West Sussex as a whole.

#### **2.1 National Policy and Legislation**

##### **2.1.1 The Future of Transport White Paper 2004**

This sets out a long-term strategy for a modern, efficient and sustainable transport system backed up by sustained high levels of investment over 15 years. Effective management of the road network is a key part of this.

##### **2.1.2 Full Guidance on Local Transport Plans (2<sup>nd</sup> Edition) 2004**

The guidance says that local authorities should have policies aimed at tackling congestion and changing travel behaviour, and these include restricting and/or charging for car parking on-street.

##### **2.1.3 The Traffic Management Act 2004**

The Traffic Management Act (TMA) takes this a step further and sets out a statutory and network management duty for all local authorities to ensure the effective management of their road networks and details the mechanisms through which this is to be achieved. Of particular importance is Part 6 which provides for the civil enforcement of parking and traffic contraventions. This primary legislation came into effect in 2008 and determines the enforcement mechanisms that can be used by local authorities in order to effectively manage their road networks.

The County Council has adopted these powers for parking enforcement, countywide, through the introduction of Civil Parking Enforcement (CPE).

##### **2.1.4 The Road Traffic Regulation Act 1984**

The Road Traffic Regulation Act is a piece of primary legislation that allows highway authorities to lawfully restrict and manage traffic (including cycling and walking - both considered 'traffic').

In particular it sets out (in Part I) how Traffic Regulation Orders (or Traffic Management Orders) can be employed to limit or prevent the use of the road by a particular form of traffic.

##### **2.1.5 The Traffic Signs Regulations and General Directions 2016**

The Traffic Signs Regulations and General Directions (commonly abbreviated to TSRGD) is the law that sets out the design and conditions of use of official traffic signs that can be lawfully placed on or near roads in Great Britain (England, Scotland and Wales)

The Traffic Signs Manual is a companion guide to the TSRGD which sets out dimensions and other details for using the authorised signs and markings

### **2.1.6 Towards a Sustainable Transport System 2007 and Delivering a Sustainable Transport System 2008**

These documents represent a response to the Stern Review and Eddington Study. The Stern Review examines the potential cost of climate change to the economy and particularly the economic costs and benefits of reducing our greenhouse gas emissions. The Eddington Study explores the links between transport, the economy and the Government's commitment to sustainable development. Five objectives for long term transport investment are put forward in the documents.

- To help our economy grow and compete internationally by providing reliable transport that makes the best use of all of our resources;
- Tackling climate change by reducing transport's emissions of carbon dioxide and other greenhouse gases;
- Make transport safer and healthier by reducing deaths, illnesses and injuries caused by transport and promoting ways of travelling that are good for our health;
- To promote a fairer society and, through transport, allowing everyone to access the opportunities that will help them improve their lives; and
- To promote the aspects of transport that improve our quality of life by helping us access the goods, services and people that we value, whilst reducing the negative effects of these trips on the environment.

Clearly, managing demand for parking is one way of changing the travel choices people have to make, so it is a necessary element in reducing emissions as well as improving the reliability of the transport network and, therefore, the economy.

### **2.1.7 Creating Growth, Cutting Carbon – Making Sustainable Transport Happen White Paper 2011**

The White Paper sets out the need to focus on low-cost, high-value interventions. A package approach is advocated, giving people choice at a local level for short trips and 'nudging' them towards sustainable choices. The view is that for many longer distance trips there is no alternative to the private car; therefore, the paper proposes technological advancement as the major part of the policy to reduce carbon dioxide emissions from transport. It also encourages local authorities to provide electric vehicle charging infrastructure in new developments and suggests that they set aside some residential car parking spaces for car club vehicles.

### **2.1.8 The Climate Change Act 2008**

The Climate Change Act 2008 is the basis for the UK's approach to tackling and responding to climate change. It requires that emissions of carbon dioxide and other greenhouse gases (e.g. via transport)

are reduced and that climate change risks are prepared for. The Act also establishes the framework to deliver on these requirements.

The Act supports the UK's commitment to urgent international action to tackle climate change and sets out a target to significantly reduce UK greenhouse gas emissions by 2050 and a path to get there.

### **2.1.9 The Portas Review 2011**

This offers an independent review into the future of our high streets and provides a valuable insight into retailers' parking needs. It explains the role parking can play in making high streets more vibrant and competitive places. The review provides a useful counterpoint to other literature on the role of parking, that should form part of the evidence used when considering parking in (or for) high streets

### **2.1.10 Planning Policy Statements and Guidance Notes**

Planning Policy Statements (PPSs) and their predecessors Planning Policy Guidance Notes (PPGs) are prepared by the Government to explain statutory provisions and provide guidance to local authorities and others on planning policy and the planning system. They also explain the relationship between planning policies and other policies, such as transport, that have an important bearing on issues of development and land use.

PPG13 provides the most comprehensive advice with regard to parking. The guidance aims to secure sustainable development from a transport perspective. PPG13 also places emphasis on the use of parking charges as a control mechanism. Again a co-ordinated approach is recommended so that appropriate charges and restrictions are established that do not undermine the vitality of town centres. PPG13 is clear that any parking controls require comprehensive treatments and adequate enforcement measures for them to be a success.

PPS 3 (Housing) states that Local Planning Authorities should, with stakeholders and communities, develop residential parking policies for their areas, taking account of expected levels of car ownership, the importance of promoting good design and the need to use land efficiently.

PPS4 (Planning for Sustainable Economic Growth) looks to set out the background in which sustainable economic growth can take place. Key to this is supporting sustainable transport, which includes ensuring that parking standards are appropriate to achieve increased levels of non-car travel.

### **2.1.11 National Planning Policy Framework 2019**

Section 9 highlights the need to consider transport in plan-making and in the determination of planning applications. Paragraph 105 states that if local planning authorities set parking standards, they should take account of the following:

- a) the accessibility of the development;
- b) the type, mix and use of development;

- c) the availability of and opportunities for public transport;
- d) local car ownership levels; and
- e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

Paragraph 106 places the onus on authorities to justify the use of maximum parking standards, stating that “Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport”.

## **2.2 Local Policy**

It is important to recognise that the IPS and related parking policies do not exist in a traffic management ‘vacuum’, rather they sit within and contribute towards the County Council’s wider transport, economic, community, environment, and health strategies.

### **2.2.1 The West Sussex Plan**

The West Sussex Plan covers the 5 years between 2017 and 2022 and outlines the County Council’s vision for West Sussex and what it is trying to achieve for its residents and for the county. It also sets out how it will make those differences and how residents will know whether it has been successful in achieving them.

Within the plan, 5 corporate priorities are identified:

- giving our children and young people the best start in life
- ensuring West Sussex is a prosperous place
- our communities being strong, safe and sustainable
- supporting you in later life to remain independent
- being a council that works for our communities.

The IPS will support the corporate priorities by recognising that communities in West Sussex are very diverse both in terms of demography and geography. It will seek to provide flexible solutions to meet local objectives by understanding and balancing the differing needs of the many stakeholders. It will also continue to provide a unified framework and rationale for applying parking policies and practices to communities in a fair and consistent way.

### **2.2.2 West Sussex Transport Plan 2011-2026 (LTP3)**

This sets the County Council’s strategy for guiding future investment in its highways and transport infrastructure. It also sets a framework for considering transport infrastructure requirements associated with future development across the county.

The Plan includes four strategies that guide the County Council’s approach to maintaining, managing and investing in transport and for meeting its main objective of improving the quality of life for West Sussex residents:

1. promoting economic growth
2. tackling climate change
3. providing access to services, employment and housing
4. improving safety, security and health.

The IPS will support LTP priorities by ensuring better traffic management which will maximise the efficiency of the existing network for the benefit of all users including managing parking to reduce obstructions and congestion.

### **2.2.3 West Sussex County Council Guidance on Parking at New Developments 2019**

This replaces the County Council's previous guidance 'Standards and Transport Contributions Methodology' (2003) and 'Guidance for Parking in New Residential Developments' (2010), and sets out its recommended approach to parking in new residential and non-residential developments.

The County Council's overall ambition for parking at new developments is to ensure that sufficient parking is provided to meet the needs of the development while maintaining highway network operations, protecting surrounding communities and pursuing opportunities to encourage use of sustainable modes of transport.

The following principles inform the design of new developments and decision-makers' consideration of proposals for new development. Unless clearly specified, the Guiding Principles apply to both residential and non-residential developments

- Accommodating Parking Demand - parking provision should be sufficient to accommodate parking demand while exploiting the potential for sustainable travel, minimising adverse effects on road safety, and avoiding increased on-street parking demand.
- Electric Vehicle Charging Infrastructure – 'active' charging points for electric vehicles should be provided at a minimum of 20% of all parking spaces with ducting provided at all remaining spaces where appropriate to provide 'passive' provision for these spaces to be upgraded in future. The number of active points will increase overtime in line with EV sales in West Sussex.
- Sustainable Transport - In some locations, limiting parking provision should form part of a strategy to exploit the potential for sustainable transport. In order to realistically promote lower levels of car ownership and use whilst avoiding unacceptable consequences, all of the following should be available or provided - travel plan measures, targeted at reducing vehicle ownership levels such as car clubs, high levels of accessibility to non-car modes of travel and to local amenities and facilities and comprehensive parking controls such as CPZs
- Traffic Regulation Orders - in some circumstances, it may be necessary to regulate on-street parking to manage or mitigate the impact of development. If TROs are required, developers will be expected to fund administration and works costs. It may also be necessary to prevent residents of new development within CPZs from qualifying for residents and visitors parking permits. Residents could qualify for permits, provided spare on-street capacity exists and the issue of permits will not undermine planning policies and travel plan measures.
- Design Considerations - developers will be expected to provide balanced, mixed, and flexible parking provision and ensure that all spaces are useable without creating highway safety

issues. This should reflect best practice as set out in national guidance and best practise, such as 'Manual for Streets', and 'Car Parking: What Works Where' as well as the 'Traffic Signs Regulations and General Directions (2016).

- Sustainable Drainage - parking areas should adopt sustainable drainage systems (SuDS) to minimise the risk of flooding in the County, as part of a drainage strategy for the development.

#### **2.2.4 West Sussex Annual Sustainability Report**

In 2011, the County Council committed to reducing its carbon footprint by 50% by 2022. By 2018/19 it had achieved a 46% reduction in its carbon emissions from the original baseline.

The annual sustainability report shows how the County Council achieved this. It is envisaged that for 2019/20 the figures which will show a likely 52% reduction.

#### **2.2.5 Draft Climate Change Strategy 2020**

In April 2019 a Notice of Motion was passed, which commits the County Council to attempt to be carbon neutral by 2030. As part of this commitment, the County Council is currently preparing a Climate Change Strategy to outline how it will respond to the challenges and opportunities of a changing climate as well as set out a vision for the future with clear commitments and leadership. The strategy will focus on carbon reduction, increasing climate resilience, sustainable resource use, strengthening the green economy and transforming the way the County Council works. Transport issues at present sit under carbon reduction but clearly have links to all other commitments.

The strategy is aligned with the County Council's target to be carbon neutral by 2030. This work contributes to the wider national commitment to be carbon neutral by 2050 and to strengthen the UK's preparedness for climate change.

#### **2.2.6 Healthy and Well in West Sussex - West Sussex Public Health Plan 2012-2017**

The Public Health Plan provides a framework for improving the health and wellbeing of the residents of West Sussex.

Transport policy contributes to the plan in a number of ways by creating and promoting social and environmental conditions that are favourable to health and encouraging lifestyles that promote health, for example promoting exercise through active travel.

#### **2.2.7 Breathing Better Air Quality Plan 2018 (updated 2019)**

The County Council has worked with the District and Borough Councils to produce a county-wide air quality plan. This plan highlights good practice already in place and shows where District and Borough Councils will assess, deliver and review improvements.

Established under the Environment Act 1995, Local Air Quality Management (LAQM) places a duty on all local authorities to regularly review and assess air quality in their areas, and to determine whether or not the national air quality objectives are likely to be achieved. Where an exceedance is considered likely, the local authority must declare an Air Quality Management Area (AQMA) and

prepare an Air Quality Action Plan (AQAP) which sets out the measures it intends to put in place in pursuit of the objectives. In West Sussex, there are currently 11 AQMA's.

### **2.2.8 Electric Vehicle Strategy 2019**

The County Council's overall transport vision for West Sussex remains one based on sustainable transport. It wants to reduce car use overall across the county in favour of public transport and active travel. However it recognises that, for certain activities, cars and vans remain an appropriate mode of transport. Moving these vehicles from petrol and diesel to electric is critical, to reduce the impact of those journeys.

The strategy sets out the County Council's vision for electric vehicles (EV) across the county, and the interventions it will be taking to deliver this vision. It looks forward to 2030, but as EV, and EV charging, is very much an emerging technology it is important for the County Council to be able to adapt to changes and ensure a flexible approach to delivery of the strategy. Therefore, the actions within the strategy focus on the period until 2024 and will be reviewed regularly to ensure adaptability to changes in technology, trends in mobility and financial considerations.

The County Council wants to support EV take up to reduce carbon emissions; improve air quality and generate revenue without risk. To achieve this vision it has three highly ambitious aims:

1. 70% of all new cars in the county to be electric by 2030, but as a minimum it wants to see at least 50% electric.
2. There is sufficient charging infrastructure in place to support the vehicles it predicts will be reliant on public infrastructure to charge.
3. Ensure a renewable energy source for all charging points it enables.

The solution is aimed at both encouraging a quick switch to EV, and addressing the barriers that are preventing the switch. The solution has two strands:

#### Encouraging

- Communication and engagement - Ensure residents understand the options for and benefits of EV ownership, are aware of available grants, and where they can find charging points.
- Incentives - Offer incentives to encourage a switch to electric vehicles as soon as possible.

#### Enabling

- New development Ensure the future long-term sustainability of EV charging by integrating infrastructure into new development
- Provide a comprehensive and cohesive public charging solution on public land. This should include three main types of charging infrastructure - residential charging, rapid hub charging and destination (top Up) charging.

## **2.3 West Sussex Parking Operational Guidance Documents**

The County Council has a suite of operational documents that translate the aims and objectives of the IPS into various actions that shape the day-to-day management of parking operations in West Sussex.

### **2.3.1 Road Space Audits – Executive Task and Finish Group Report 2017**

This report presents the findings of the Executive Task and Finish Group (TFG) into the potential for the expanded use of Road Space Audits (RSA) across West Sussex

### **2.3.2 WSCC Parking Policy 2018**

This policy document combines and replaces three sets of guidance concerning the operation of Civil Parking Enforcement (CPE) in West Sussex. These are the CPE Enforcement Policy Manual, the Penalty Charge Notice Processing Guide and the Penalty Charge Notice Case Manual. The parking policy seeks to reflect the latest national legislation and guidance while recognising local needs and conditions across the county.

### **2.3.3 WSCC Controlled Parking Zone Management Guide**

The Controlled Parking Zone (CPZ) Management Guide is a guidance note issued by the County Council to the District and Borough Councils, and their contractors, outlining its recommendations on how to manage the seven CPZs (Bognor Regis, Billingshurst, Chichester, Crawley, East Grinstead, Horsham and Worthing). This is a working document that is reviewed regularly in order to ensure that best, and consistent, practice is followed.



## Part 3

### 3. An IPS for West Sussex 2020 - 2025

#### 3.1 The Aim of the IPS

**To bring together a number of different policy influences to commission a joined-up parking service in West Sussex that reflects the objectives of Government, the County Council and Stakeholders and to meet the needs of the Community.**

The County Council is committed to an active role in the overall management of public parking throughout West Sussex. 'Integrated', in this case, refers to the coming together of various parking functions that are the separate responsibility of the County Council and the District and Borough Councils, and the close liaison between those authorities to provide a coordinated and joined-up parking service.

#### 3.2 The Objectives of the IPS

By definition, the objectives of the IPS are broad, encompassing a range of policy influences, namely; Traffic Management, Community, Economic, Health and Wellbeing, Location, Enforcement and Financial.

##### 3.2.1 Traffic Management

1. To manage the free flow of all traffic on the highway and to maintain road safety for all road users.
2. To share out limited kerb space amongst competing user groups, fairly and transparently.
3. To maintain town centre parking charges and controls that provide effective demand management to:
  - protect the needs of residents and their visitors;
  - encourage the turnover of on-street parking of short duration;
  - support local businesses
  - encourage long-stay parking to take place in off-street car parks and/or designated on-street locations; and
  - minimise the effect of circulating traffic 'searching' for spaces.

##### 3.2.2 Community

4. To prioritise parking in residential areas for use by residents and their visitors.
5. To ensure that the parking and transport needs generated by new development are adequately provided for by the development and do not have adverse impacts upon local communities.

### **3.2.3 Economic**

6. To provide sufficient on-street car parking in town and district and village centres to maintain economic vitality and viability without encouraging unnecessary or excessive car use.

### **3.2.4 Health and Wellbeing**

7. To reduce levels of car ownership and reliance on the private car as the principle mode of choice through the promotion and support of alternatives, including car clubs, car sharing, non-car modes and active travel.
8. To facilitate the adoption of less polluting technology, such as electric vehicles, through the development of appropriate support infrastructure.

### **3.2.5 Location**

9. To positively encourage the location of activities in well-served and accessible areas.
10. To locate long-stay parking spaces in off-street car parks or less central on-street areas, subject to the safeguarding of residents' parking needs.
11. To support the provision of out-of-town Park and Ride schemes that reduce long-stay town centre parking.

### **3.2.6 Enforcement**

12. To provide a single integrated parking service, combining on-street and off-street management and enforcement that will be accessible, at a local level within the Districts and Boroughs.
13. To provide the effective enforcement of parking controls.

### **3.2.7 Financial**

14. For parking schemes to be self-financing. Individual schemes should, preferably, recover their set-up costs over a period of time and return a surplus to the On-Street Parking Account to provide for on-going maintenance, monitoring, enforcement, review and extension, where necessary.
15. To review parking charges regularly and to set those charges at levels that cover operating costs and influence short and long stay parking demands, consistent with traffic management and demand management objectives.
16. The County Council's On-Street Parking Account, to which all expenditure and income is assigned, to operate in surplus, as required under Section 55 of the Road Traffic Regulation Act 1984. Any surpluses should be used, in the first instance, to implement or support parking schemes, and subsequently to improve parking facilities and approved transport and environmental improvement schemes, strategically across the County irrespective of where they originated.

### **3.3 IPS Policies 2020 - 2025**

Within the IPS sit a set of policies/priorities that, when applied together, will help deliver the aims and objectives outlined above. Many of these policies/priorities are cross-cutting and the headings under which they are grouped are only intended to aid the narrative and flow of this document and are not intended to limit the application of any to a particular use or area.

#### **3.3.1 Service Integration**

The Department for Transport (DfT) has issued operational guidance which sets out the policy framework within which the Government believes that all English Local Authorities, both inside and outside London, should be setting their parking policies and, if appropriate, enforcing those policies.

While non metropolitan District and Borough Councils in England are not able to apply for Civil Parking Enforcement (CPE) powers the guidance stipulates that there should be very close co-operation between District and Borough Councils and their County Council. The guidance goes on to suggest that a District/Borough Council might, under an agency agreement, carry out parking enforcement on behalf of a County Council.

In most areas with two tiers of local government it is the District/Borough Council that own and operate most local authority off-street car parks. Where a District/Borough Council also acts as an agent for their County Council, there should be significant efficiency gains in having a unified CPE operation.

Accordingly, the County Council has followed this model when introducing CPE in West Sussex between 2006 and 2010 and on-going operations in each District/Borough focus upon the provision of a unified parking service, combining on-street and off-street management and enforcement that is accessible and effective, at a local level.

West Sussex is divided into seven Civil Enforcement Areas (CEAs), which are contiguous with the District and Borough boundaries. The County Council is the Enforcement Authority for the enforcement of all decriminalised on-street parking regulations within the CEAs. The Police remain responsible for parking enforcement in those roads and areas that are excluded from the CEAs and for some other areas of enforcement. The County Council is also the Enforcement Authority for any off-street parking areas and car parks that it operates or controls.

The District and Borough Councils are the Enforcement Authorities for off-street car parks and parking areas that they operate or control. Through the use of Agency Agreements, they have also been delegated the responsibility for the on-street enforcement service and provision of a Controlled Parking Zone (CPZ) management service. Under these joint working arrangements, the County Council is not responsible for the issuing or determination of Penalty Charge Notices (PCN) and any appeal against the issue of a PCN is made to the relevant District or Borough Council.

The County Council is confident that the current CPE service in West Sussex is being delivered fairly and transparently and in accordance with legislative requirements and industry standards, but it is always keen to identify areas for wider strategic and organisational improvement where necessary.

Areas of intended improvement for the period 2020 – 2025 include a reduction of management costs and other overheads, a more streamlined set of processes and therefore lower administrative costs, and more cost effective deployment of staffing resource and thus reduced staffing costs.

In short, the County Council will explore whether its current CPE service can be improved so that service provision is delivered and organised in the most efficient and cost effective way.

*Policy IPS 1 The County Council, together with the District and Borough Councils, will take all reasonable steps to provide a cost-effective and efficient parking service.*

### **3.3.2 Effective Enforcement**

When it comes to the enforcement of on-street (and off-street) parking regulations, there are a number of principles that the DfT endorses and that underpin the Statutory and Operational guidance issued to local authorities. These are:

- The public have a right to expect fair and efficient enforcement
- There is a need for public confidence in a CPE scheme
- Authorities must have appropriate back office systems in place including properly trained staff
- Notice to Owner backlogs must be avoided
- Representations must be dealt with quickly and efficiently
- Mitigating circumstances must be properly considered
- Properly reasoned decisions must be given in response to representations
- Local Authorities must be sure of their ground before they contest appeals

The primary aim of enforcement in West Sussex is to achieve the following;

- To encourage a high level of compliance by motorists with the parking controls and waiting and loading restrictions.
- To integrate traffic management policies with effective on-street enforcement.
- To ensure the equitable distribution and management of the availability of parking space.
- Be responsive to changing priorities, local factors and demand.
- Provide parking permits, exemptions, dispensations and waivers for residents and businesses, the disabled, and others as appropriate.

A good CPE regime is one that uses quality-based standards that the public understands, and which are enforced fairly, accurately and expeditiously. Parking enforcement in West Sussex will therefore be ‘fair but firm’ and community support for or acceptance of parking controls is conditional upon achieving this balance in the enforcement operation. A West Sussex Parking Policy has recently been reviewed and updated to assist in this objective and establishes the “ethos” of CPE. It also seeks to minimise the potential for misunderstanding and dispute over specific parking issues.

Enforcement activity in West Sussex will therefore comply with the following general principles –

- Fairness in applying the legislation and securing compliance.

- Focusing enforcement action where necessary.
- Consistency of approach.
- Transparency about what enforcement action is taken and why.
- Recognition that an effective relationship between all areas of the enforcement operation is needed.

*Policy IPS 2 Civil Parking Enforcement will be quality based and information readily available to help road users understand that enforcement is as fair, accurate and expeditious as possible.*

### **3.3.3 Maintenance**

Key to the successful enforcement of parking is ensuring the correct lining and signing of the parking restrictions as they appear on-street and the expeditious correction of any faults to the lines and signs, when they occur.

The County Council has developed a framework that will form part of the existing CPE agreements with the District and Borough Councils, enabling them to undertake remedial work to the on-street parking lines and signs on behalf of the County Council. The framework will be kept under continuous review so that the provision of this service is delivered and organised in the most efficient and cost effective way.

*Policy IPS 3 Parking signing and lining defects will be corrected as soon as possible after being reported.*

### **3.3.4 On and Off-Street Parking Management**

The management of parking, in particular in built up areas, has become increasingly important for the County Council as the number of vehicles on the roads in West Sussex continues to increase. Residential areas, town/city centres and areas close to railway stations, local attractions or hospitals all experience varied levels of parking pressure and this can lead to conflict between competing user groups, for example between residents, shoppers, deliveries and workers.

The majority of issues raised with the County Council tend to concern either a lack of available parking space or inconsiderate parking, or a combination of the two. Increasing the amount of on-street parking space is rarely possible and so the council has to try and find ways to make the best use of the limited space, providing parking for those that most need it while not ignoring the broader requirements of all road users. By restricting on-street parking where demand exceeds supply, and providing alternative means of access to such areas, the pressure on the space available can be better controlled.

The County Council has no direct control over the provision of off-street parking in West Sussex as this is a matter for the District and Borough Councils as well as private operators. Nevertheless, all parties need to work together in order to ensure that on-street and off-street parking provision complement each other. In many circumstances, the purpose of this is to encourage motorists to park off street, particularly when parking for a long time i.e. while at work.

The cost of off-street parking should therefore be set below that of comparable on-street parking with a similar level of accessibility to facilities, such as shops and services. This creates a pricing mechanism whereby the off-street facilities are used in the first instance, increasing the availability of on-street parking for stays of the shortest duration and/or those trips that require the greatest accessibility. This mechanism makes the most efficient use of both on and off-street parking capacity, generates a turnover of spaces to support the local economy, minimises the effect of circulating traffic, 'cruising' for spaces and maximises on-street access for activities such as the loading and unloading of goods.

So overall, it is important to recognise that on and off-street parking management offers one of the main means of regulating the total flow of traffic to and from or within a built up area. Whilst policies can be adapted to local circumstances; the underlying principles that will be followed by the County Council are widely applicable. These are:

- parking policies should positively encourage the location of activities in well-served and accessible areas;
- management of all public parking spaces should complement transport and planning policies to discourage car use in congested urban areas;
- tight parking control regimes should be the norm for town centres to enable charges and restrictions to be used as effective demand management tools;
- effective enforcement of on-street parking regulations is required and there is a general recognition that CPE is the most suitable mechanism;
- greater priority should be given to short stay shopper and visitor demand which add most value to the viability of the town centre;
- emphasis should be on ensuring rapid turnover of spaces in most convenient shopper car parks by a more consistent approach to parking charges;
- where possible, the needs of residents and their visitors should be given the highest priority
- restrictive parking management regimes are likely to be acceptable only if there is seen to be investment in public transport alternatives;
- parking standards for new development provide a consistent level of provision across the County.

<i>Policy IPS 4</i>	<i>Parking management in town centres and around other attractors will seek to balance the needs of the various competing user groups and maintain the economic viability of those areas.</i>
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<i>Policy IPS 5</i>	<i>Management of all on-street parking spaces should complement other transport and planning policies to discourage car use in congested urban areas.</i>
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### **3.3.5 Demand Management and Parking Charges**

Demand management is perhaps best understood when described in terms of the 'carrot and stick' approach to transport planning. Much of the County Council's Local Transport Plan is about improving travel alternatives and encouraging people to change their travel habits as a matter of personal choice - this is the 'carrot' part of demand management.

However, there is widespread agreement that transport capacity is increasingly a scarce resource and an argument that private car use that is virtually free at the point of use can be controlled best by charging. Many people believe that with traffic levels continuing to rise there will come a time when charging is preferable to the costs of ever-increasing congestion – this is the ‘stick’ part of demand management.

The County Council’s overall approach to managing demand utilises a mix of 'soft' measures such as road improvements and bus priority schemes, and 'harder' measures such as some form of road user charging. The IPS provides the platform for the introduction of the 'harder' type demand management measures.

On-Street parking charges enable the County Council to deliver its wider objectives for parking. Amongst other things, the availability and cost of on-street parking is important in supporting the economic vitality of town centres and reducing traffic congestion. Achieving the correct level of charges is not an exact science, and there is no ‘one size fits all’ approach. Instead, many factors need to be balanced in order to arrive at an appropriate level of charging.

- Parking charges can help to curb unnecessary car use where there is adequate public transport or where car-sharing, walking and cycling are realistic alternatives, for example, in town centres;
- Charges can reflect the value of kerb-space, encouraging all but short-term parking to take place in nearby off-street car parks where available. Charges at a prime parking space in a busy town centre should normally be higher than those either at nearby off-street car parks or at designated places in more distant residential areas. Such a hierarchy needs to be as simple as practicable and applied consistently so that charge levels are readily understandable and acceptable to both regular and occasional users;
- Charges should be set at levels that encourage compliance with parking restrictions. If charges are set too high they could encourage drivers to risk non-compliance or to park in unsuitable areas, possibly in contravention of parking restrictions. In certain cases they could encourage motorists to park in a neighbouring area which may not have the capacity to handle the extra vehicles. In commercial districts this may have a negative impact on business in the area;
- If on-street charges are set too low, they could attract higher levels of traffic than are desirable. They could discourage the use of off-street car parks and cause the demand for parking spaces to exceed supply, so that drivers have to spend longer finding a vacant space. This will also inevitably lead to increased congestion and reduce the accessibility of the area.

For the period 2020-2025 the County Council will develop, implement and operate a differential parking and permit administration charges mechanism that will encourage the ownership, take-up and use of zero and low emission vehicles, while discouraging the ownership and use of noxious and high emission vehicles. The emission-based charging is proposed to be consulted on in accordance with the emergence of the enabling technologies to assess its applicability and impact on residents

and road users within West Sussex with a view to promoting the use of low or zero emission vehicles.

On that basis, on-street parking charges will be reviewed regularly (i.e. annually or bi-annually) to ensure that they remain in balance with off-street charges, that all operational costs are met and that wider parking and environmental objectives are being met.

<i>Policy IPS 6</i>	<i>Parking charges will be levied for traffic management purposes - to maximise capacity by stimulating turnover, encourage the use of off-street car parks and to act as a demand management tool.</i>
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<i>Policy IPS 7</i>	<i>Parking charges will be reviewed regularly and set at an appropriate level to cover operating costs and influence parking demands, consistent with traffic management and environmental objectives.</i>
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### **3.3.6 Controlled Parking Zones**

Controlled Parking Zones (CPZs) are a vital component of the County Council's approach to on-street parking management and are a key demand management tool, in that they can control and manage parking over a wide area.

CPZs are already established in Billingshurst, Bognor Regis, Chichester, Crawley, East Grinstead, Horsham and Worthing and operate primarily to assist people living in areas where they experience difficulty in parking close to their homes, for example, as a result of existing waiting restrictions or non-residents who park for long periods in nearby roads. CPZs are designed to prevent or manage all day on-street parking by non-residents, make it easier for residents, shoppers and visitors to park, enhance road safety, and remove obstructions to private accesses by eliminating indiscriminate parking.

Within CPZs, large signs are located at all zone entry points. These inform motorists of the hours during which parking is controlled within the area they are entering. During the hours of control, parking is permitted only in designated parking bays (marked with white lines). Signs are positioned adjacent to all parking bays showing the hours of parking control and the type of parking permitted, e.g. Permit Holders only.

Residents holding a permit can park a vehicle in any parking bay where permit parking is allowed, within the zone that is specified on the permit. Normally this would be within their own street or close to their home. Wherever possible parking bays are located outside or near residential properties in order to try to ensure that residents can park close to their own property, although parking in a particular space cannot be guaranteed.

Within CPZs there may also be free limited waiting and/or Pay & Display parking bays which are clearly indicated by road signs. These may be used without the need for a permit and are designed to allow more people to use local shops and facilities. Some of these bays may also be used by permit holders for unlimited stays i.e. Shared use bays, where signs permit shared use. Double and single yellow lines may also prohibit parking on junctions and along certain lengths of road at certain (or all) times.



The provision of just yellow lines and/or limited waiting bays may improve the parking situation in certain roads but these restrictions apply to all road users. CPZs allow particular users, such as residents, to park for longer periods.

Residents' parking permits are not provided free of charge, partly because experience elsewhere shows that free schemes are more likely to be abused (by permits being acquired when they are not intended for use by residents but are passed on to non-residents), but also because free or cheap parking does not help to regulate demand and the congestion that results. Residents should make a payment which covers at least the administration costs involved and, if possible, contribute towards the cost of enforcement to avoid the costs of providing and operating the scheme being passed to the general rate payer.

Therefore, residents' permit prices in areas that are subject to short periods of restriction (such as one hour in the morning and/or afternoon rather than all of the working day) can be charged at a lower rate than an area where parking controls operate all day, to reflect the lower enforcement requirement.

Parking permits do not entitle residents to park in a particular place on the highway but operate within a specific zone, which will usually cover a number of roads in the locality. This enables space to be shared out within a community where, for example, main arterial roads might have limited parking with most of the available parking constrained to neighbouring residential roads.

Waiting lists will be kept if demand for spaces exceeds the spaces available for residents by more than an appropriate margin. This margin is usually 10%, but may vary in light of experience, as a proportion of residents will be away at any given time.

More than one permit may be issued per household (subject to waiting lists), but priority will be given to one per household and second and subsequent permits will be at an incrementally higher price (typically double and triple, etc. the price of the first permit).

Residents may purchase Visitor Permits for their guests, which enable visitors to park in residents' parking bays. These are limited to the particular zone in which the resident lives and are, typically, valid for two hours. In zones with two hours of control – an hour in the morning and an hour in the afternoon – a single permit is valid for the entire day (i.e. for both hours of residents' parking).

Where there are roads with sufficient space available during the working day, permits may be sold to non-residents, at a premium price. As such, a Non-Residents' Permit would be restricted to a specified road(s). These permits can help to address the needs of other user groups, for example, commuters, who might not have adequate or suitable off-street parking available for their use and this can help to manage parking that might otherwise be 'displaced' to roads surrounding the zone, by bringing the vehicles into the zone, in a managed and controlled way.

Whilst the mobility benefits that car ownership brings are acknowledged, it is important that other transport options are not overlooked and CPZs can also be used to facilitate some of these. Such options can be tailored to suit the specific situation and could include:

- encouraging, developing and supporting community car clubs as an alternative to individual car ownership. This can be done by providing car club parking bays at appropriate locations;

- actively promoting car sharing schemes to residents;
- actively promoting public transport through information, discounts and journey planning;
- actively promoting cycling and walking through an awareness of the health benefits, information on safer cycling routes and group discounts;
- minor infrastructure improvements, such as cycle parking facilities; and
- other promotions and incentives, such as group discounts on supermarket deliveries.

These strands are inter-dependant and together can provide a package of measures for the improvement of the community.

*Policy IPS 8 CPZs will be periodically reviewed to ensure that they are achieving the desired effect and responding adequately to any changes in parking activity that may have arisen since the last time they were reviewed.*

### **3.3.7 Place Based Planning**

In many areas, the introduction of waiting restrictions, including CPZs, has facilitated some degree of traffic management but invariably, parking problems have merely been moved into nearby unrestricted areas. Beyond this, the level of new development is already exacerbating these parking problems in many areas.

A different and more progressive approach, known as a Road Space Audit (RSA) has been adopted by the County Council in order to determine if there are other ways to consider existing and future parking demands.

In order to ensure that its local parking policies take into account a whole 'place' both now and in the future, the County Council will place more emphasis on wider place/locality based planning. RSAs will therefore be used to inform the production of a strategic blueprint for a particular place that defines how parking, various alternative travel solutions (bus, rail, cycling, walking etc), infrastructure improvements, safety considerations and future development (e.g. housing) can be integrated so that the road network is used and managed in the most efficient way possible.

RSAs will provide essential technical data that identifies and assesses the current demands upon the road network and parking stock (i.e. how it is currently being used), whether these demands are actually being met as well as residents and users views. RSAs will identify potential future demands/pressures and may make recommendations for improvement. RSAs may also assess what measures and resources might be required in order to meet these challenges, adjust supply and ultimately optimise the efficiency of the road network and parking stock.

It is accepted that the need for RSAs and other parking studies exceeds the Council's ability to meet concurrently in terms of both funding and staff resources. A method has therefore been developed by which the resources of the County Council will be focused on priority locations whilst also allowing other Council teams or external authorities to also progress such studies. The priority locations will have the following characteristics:

- Larger urban areas as defined in the County's Economic Growth Strategy.

- The extent to which an area has a clear vision for how the residents and businesses want a place to evolve, as a RSA can then serve to enable that vision and make the case for reallocating road space.
- High level of agreement and support from local authorities and key stakeholders.

A three tier programme of RSAs has been established for West Sussex.

### **Priority Growth Areas**

Chichester, Crawley, Burgess Hill, Worthing – significant growth programmes for these areas have been prioritised for further capital investment and form a key part of the County Council’s forward economic vision. RSAs are seen as integral to the development of each growth programme.

### **Pipeline Areas**

Horsham, Bognor Regis, Littlehampton and Shoreham – growth plans for potential investment and the progression of strategic development locations will continue for these areas and in due course, a prioritised programme will emerge. RSAs would be appropriate as required to feed into this overall programme. In addition and depending on local development requirements RSAs may be considered for those towns where there is a train station and attempts to address parking issues at one station, may have knock –on effects at nearby stations

### **Locally Identified Areas**

Ad hoc RSAs or Parking Management Plans\*\* to be undertaken by District/Borough/Parish Councils e.g. Barnham, East Grinstead.

\*\* Smaller towns or villages present a different set of issues and could be better suited to a light touch version of RSA process, which could incorporate the core components but the level of detail for the data collected, range of solutions available and scale of consultations would need to be commensurate to the study area. In this respect population, local employment, attractors, place function, extent of parking stress and transport issues would be important criteria for scoping the study. It may be that in some cases more localised issues can be resolved through a single scheme (e.g. a parking management plan) without requiring a more comprehensive strategy.

*Policy IPS 9 Road Space Audits will be made available as the primary approach to parking management across West Sussex.*

### **3.3.8 Verge and Pavement parking**

Most footways and verges are only designed and constructed to take the weight of pedestrians, mobility scooters and wheel chairs. The weight of a car or goods vehicle parking on a footway or verge (i.e. where one or more wheels are on the footway or verge) can cause considerable damage as well as other problems:

- Obstructing vulnerable road users who use the verge or footway;
- Obstructing road users entering and leaving properties;
- Causing congestion by parking on narrow streets without suitable provision (i.e. half on the footway, half on the carriageway);
- Reducing visibility at junctions, bends and narrow roads;

- Parking on footways is unsightly and can cause environmental damage;
- Causing damage to underlying drainage and utility services networks;
- Parking prevention measures such as marker posts require maintenance and add to street clutter and can also impact upon grass cutting etc.

It is generally accepted that it is legal to park at the side of the road (including a grass verge or footway) unless a Traffic Regulation Order (TRO) or Byelaw is in place, an obstruction is caused or if the vehicle is a heavy goods vehicle. However, it is a criminal offence (under section 72 of the Highways Act 1835) to drive onto a footway or verge, whether with intention to park or not, although there have long been concerns about the extent to which this is enforced by the Police.

Enforcement of obstructions is the responsibility of the Police who may issue a Fixed Penalty Notice (FPN) if there is considered to be an actual (rather than perceived) offence and a high risk of harm to an individual or individuals e.g. pedestrians or wheelchair users who are prevented from moving freely. The Police can also remove vehicles which are causing an obstruction.

Goods vehicles are prohibited from parking on verges, footpaths or the central reservations of roads under section 19 of the Road Traffic Act 1988. The maximum penalty for committing an offence under section 19 is a £1,000 fine. In West Sussex, a PCN may also be issued to a heavy goods vehicle if it is parked wholly or partly on a footway, verge or on land between two carriageways, irrespective of whether there are waiting restrictions in place. The accepted means of identification of a heavy goods vehicle is any goods vehicle which has an operating weight exceeding 7.5 tonnes and the external display of striped yellow or red or LONG VEHICLE rear markings.

In cases where the County Council wishes to take action, a TRO is the most effective way to enforce footway or verge parking. Where a TRO is in place on the carriageway of a road, adjacent to the area where verge or footway parking takes place, and if the order restricts waiting in any way (e.g. yellow lines), then a Penalty Charge Notice (PCN) can be issued against a vehicle parked on the adjacent verge or footway. This is because the power of a yellow line applies not just to the carriageway, but to the back of the highway boundary. In any cases where a TRO on the carriageway does not restrict waiting (i.e. a permit holder bay) an additional TRO that restricts loading/waiting may also be applied to the footway or verge.

It is also possible to deter footway and verge parking and clearly indicate where people can park through a variety of physical measures. The choice between these measures depends on desired effect, location, access requirements and the need to consider requirements of disabled people, safety factors, aesthetic considerations and the funds available.

Standard guard rails can be used to prevent pavement parking although their disadvantage is that they limit where pedestrians can cross a road or where people from parked vehicles can get onto the pavement. They are not generally suitable unless for safety reasons the aim is to channel pedestrians to particular crossing points.

Bollards are particularly useful at raised junctions, where the carriageway is level with the pavement. They can be positioned to demarcate the edge of the carriageway, and provided gaps between bollards are not greater than 1.5m, vehicles are prevented from mounting the pavement. Where

pedestrians are intended to cross, the gap may need to be greater to accommodate the pedestrian flow, or to meet the regulatory requirements of a controlled crossing.

If space allows, fixed or movable planters can be used to form an effective barrier to vehicles parking on pavements. The design should avoid causing problems for visually impaired pedestrians: the height and positioning are particularly important. The planters should not make it difficult for pedestrians to see or be seen by approaching traffic.

The County Council ensures that grass verges are maintained within its agreed Safety Policy. Bollards and posts deemed to be necessary to mitigate risk to highway users (hazard marker posts) can be provided at sites identified by highway inspections. Any existing verge marker deemed to be ineffective or pose a hazard to members of the public can also be removed and made safe.

The County Council no longer subsidises the installation of verge marker posts in order to prevent parking and improve the street scene. However, it will continue to work closely with residents (on a case by case basis) to seek an alternative approach that is either self-funding or eliminates the need for verge marker posts altogether.

The County Council discourages indiscriminate verge and footway parking where it can but it also recognises that in some situations where on-street parking capacity can't meet demand, verges and footways are often utilised as overflow parking. Whilst this is not ideal, it is often necessary to prevent roads from being obstructed by vehicles. In cases where no serious damage is being caused (e.g. ruts in a verge that are less than 100mm) the County Council may choose not to take any action.

If the footway is wide enough, a TRO can be made to allow parking partly or wholly on defined sections of footway. It is suggested that this should only be considered where a clear width of 2 metres would still remain for pedestrians. There would still be a need to strengthen the footway and the kerbs and to make sure that pedestrians (particularly partially sighted pedestrians) have a clear route around the cars. The County Council would also have to be satisfied that pedestrians would not be endangered as the vehicles manoeuvre into the spaces.

The Council may also introduce a variety of alternative treatments in roads where footway parking is commonplace. Works of this nature can be expensive, but there may be opportunities to introduce them when maintenance schemes are undertaken e.g. carriageway widening, shared surface arrangements. By redefining the road space, there is no need for a footway parking order and the associated signs.

At a national level, the Pavement Parking (Protection of Vulnerable Pedestrians) Bill was first debated in Parliament in 2015 and since that time, investigations have been on-going regarding the potential to prevent footway/verge parking across wide areas in the same way as it currently happens in London, whereby all parking is restricted unless signs/markings indicate otherwise. A Transport Select Committee have recently considered the issue of footway parking in general and have made the following recommendations:

- That the Department for Transport plan, fund and deploy a national awareness campaign to highlight that driving onto the pavement is illegal, and to show the negative consequences of pavement parking for pedestrians including older people, disabled people and children. This campaign should highlight the physical dangers involved in pavement parking; how it can cause social isolation; and aim to reduce the instances of pavement parking.
- That the Government bring forward proposals to reform the TRO process—to make it cheaper and easier for local authorities to use—and bring forward any required secondary legislation, if necessary, by spring 2020.
- That the Government abolish the requirement to advertise TROs in a local newspaper. It should replace this with a requirement for the local authority to maximise the reach of its advertising to the largest number of people by whatever media would best achieve this. The Government should commit to achieving this by spring 2020: it should be delivered alongside the wider reforms to TROs recommended above.
- That the Government undertake actions to ensure that local authorities and police forces have access to the correct information about who enforces which offences and they are clear about their responsibilities. They should also commit to publicise to the general public who enforces which offences as part of the public awareness campaign we recommended above.
- That the Government consult on a new offence of obstructive pavement parking, with a view to making such an offence subject to civil enforcement under the Traffic Management Act 2004 and introducing the relevant legislation by summer 2020.
- That, in the long term, the Government legislate for a nationwide ban on pavement parking across England, outside London. The legislation should give the Secretary of State for Transport powers to make secondary legislation setting out exemptions that local authorities can make from a nationwide ban. We recommend that the Government include in the legislation a provision for a new exemption order process based on the London model. The specific nature of those exemptions should only be determined following public consultation and the full involvement of local authorities across England. It should include a full impact assessment to weigh the resource implications to local authorities of different options. The enforcement of this ban should lie with local authorities and not the police who do not have time to enforce parking offences.

The PATROL (Parking and Traffic Regulations Outside London) Joint Committee has consulted its member authorities on the issue of pavement parking during a series of workshops in Autumn 2018. These workshops brought together 75 Councillors and Officers representing district, county and unitary authorities outside London, to explore the challenges of pavement parking and the powers that would help them manage it in a way that would respond to the particular needs of their communities.

The workshops confirmed that pavement parking remains an issue; however, the challenge differs from authority to authority, and a 'one-size-fits-all' approach, such as a nationwide pavement parking ban, could create additional challenges for communities.

A number of practical concerns were raised by members during the course of the workshops, including:

- Inflexibility, in terms of the varying needs of local communities and their built environment, and the implications for dis-applying the statutory instrument, should a nationwide ban not be appropriate in a specific locality. There will inevitably be some streets where there will be a range of views, implications of road layout and use factors that contribute to the debate about whether pavement parking should/could be banned or not;
- the significant costs associated with dis-applying the statutory instrument to allow pavement parking within particular areas of a local community (inc. surveys, Traffic Regulation Orders and consultation);
- the increased signage that would accompany the introduction of such areas of permitted pavement parking.

Member authorities have therefore proposed a more locally responsive approach, which would enable them to draw on a range of options to manage pavement parking in their communities. Under existing powers, this could include enforcing against vehicles parked in contravention of existing waiting restrictions and / or the current approach of introducing pavement parking bans within designated areas, based on TROs and signage.

The further solution proposed by PATROL authorities of adding obstruction of the highway to the list of contraventions for which civil enforcement applies, contained in Part 1 of Schedule 7 of the Traffic Management Act 2004, is a readily available and empowering option.

By using secondary legislation in this way, the Government could take immediate action on pavement parking, while considering the implications and feasibility of other approaches. There are a number of actions that would be key to the success of the introduction of highway obstruction to the list of contraventions for which civil enforcement applies:

- Statutory Guidance on civil parking enforcement to reflect the additional power.
- Meaningful local consultation with stakeholders and local publicity ahead of changes to local enforcement policy.
- Public information to reinforce that inconsiderate pavement parking is not acceptable.
- The use of warning notices on the first occasion a vehicle is identified

It would be a matter for each authority to formulate and publish policies on the type of obstruction they propose to target in their area. The Secretary of State would issue Statutory Guidance under Section 87 of the Traffic Management Act concerning appropriate considerations and application of the additional power.

The Guidance could address the types of obstruction that should typically be subject to civil enforcement, as well as recommend that a warning notice should be issued on the first occasion a vehicle is identified as causing an obstruction. Local authority civil enforcement teams have more than enough experience to make a judgement as to what constitutes obstruction.

- Civil Enforcement Officers (CEOs) are already undertaking dropped kerb enforcement and have demonstrated that this can be done proportionately.
- Dealing with obstruction in car parks is commonplace.

Currently, obstruction attracts light-touch enforcement by the police. Each authority would need to publish its own policies and priorities for enforcement (e.g. certain streets, and examples of unsociable parking that create problems for other road users and people with disabilities). This would ensure that enforcement would not be perceived as arbitrary beyond the scope of the published policies.

With developments in technology, if a CEO is in doubt about whether a vehicle is obstructing, photos can instantly be sent to superiors for confirmation. There would also need to be public information that this additional power had been given to local authorities, together with illustrations of the type of parking that would attract a penalty for obstruction.

Taking all of this into account, the County Council will wait for any further consultation and/or legislation on the national stage before looking at any further detailed work on footway/verge parking. In the meantime, it will continue to consider and promote TROs to prevent footway/verge parking within a specified area.

*Policy IPS 10    Verge and footway parking TROs may be implemented to prevent or prohibit parking that causes damage to the verge and/or footway or that causes an obstruction to other road users.*

### **3.3.9 Blue Badge (Disabled Persons Parking) Scheme**

The Equality Act 2010 protects disabled people from direct or indirect discrimination. Sections 20-22 of the Act, imposes a duty to make reasonable adjustments to ensure that a disabled person is not put at a disadvantage in comparison with persons who are not disabled.

The County Council attaches particular importance to catering for disabled people. The Department for Work and Pensions reports that 44% of state pension adults, 19% of working age adults and 8% of children are disabled. It is therefore an important part of parking policy that disabled people who severely struggle to access the community, should be able to travel with the minimum of difficulty.

The Blue Badge Scheme is a National Concession, managed by the Department for Transport and administered in West Sussex by the County Council. The scheme is governed by legislation and eligibility criteria set by central government. The Scheme provides a range of national on-street parking concessions for eligible disabled people with visible and non-visible ('hidden') disabilities to assist them to access goods and services, by allowing them to park close to their destination. Blue Badge holders may travel as either the driver or passenger in accordance with the rules of the scheme.

The parking concessions available to Blue Badge holders continue to apply automatically when CPE is introduced. The County Council supports Blue Badge holders by facilitating parking:

- Free of charge and without time limit at on-street pay-and display spaces;



- As long as they wish where others may park only for a limited time, unless there is a traffic regulation order in place specifically time-limiting parking for Blue Badge holders;
- On single or double yellow lines for up to three hours except where there is a ban on loading and unloading.

Blue Badge holders, like other road users, must obey the Highway Code. For example, they are not entitled to park:

- In loading bays during the hours of operation;
- On pedestrian crossings (including zigzag area);
- On bus stop clearways; and
- On school 'keep clear' markings during hours of operation.

Blue Badge holders should also not park where it would endanger, inconvenience, or obstruct pedestrians or other road users. This includes on a bend, close to a junction or where the kerb has been lowered, or the road raised for wheelchair users. Further information may be found in the Department for Transport booklet *The Blue Badge Scheme: rights and responsibilities*.

Vehicles displaying a valid Blue Badge will not be immobilised (clamped). Police constables and CEOs have the power to inspect Blue Badges and if they have good reason to suspect misuse, the power to retain the badge.

Holders of a valid Blue Badge do not have statutory exemption from removal (tow-away) action as they do from clamping. However, disabled people frequently rely heavily or completely upon their vehicles and removal can cause them great inconvenience. The Secretary of State recommends that vehicles displaying a valid Blue Badge are only removed if there is an emergency, security or ceremonial reason, or the vehicle is causing a serious safety hazard or obstruction. In any event, the County Council does not currently operate a CPE clamping or removals policy.

### **Abuse of the Blue Badge scheme**

There are several ways in which Blue Badges can be misused. These include:

- Misuse of a valid badge by a friend or relative, with or without the badge holder's knowledge or permission;
- Misuse of a badge issued to a person who has since passed away;
- Fraudulently altering a badge in order to make it appear valid (such as altering the expiry date);
- Use of a badge that has been reported lost or stolen – possibly to obtain another badge for a friend or relation; and
- Use of a badge that is no longer valid.

### **Enforcement Action Day operations**

In 2019, 99% of prosecutions for Blue Badge misuse in the UK were non-badge holders using another person's badge. Blue Badge Investigators may be employed by the County Council to detect and investigate misuse on specific action days, which will likely to involve checking Blue Badges in use and where misuse is suspected, retaining badges for further investigation and possible legal action.

CEO's and local parking teams will be able to support these operations to share knowledge and knowhow.

### **Targeted surveillance operations**

Where this is a clear problem (and there is a business case for tackling it) District and Borough Councils may, either individually or as a group, set up a specialist Blue Badge enforcement team to carry out undercover surveillance work. The team may identify suspected systematic abuse and apply for permission to carry out undercover surveillance in order to build up evidence that can later be used to prosecute the individual in the Magistrates Court.

### **Working with Sussex Police**

Misuse of a Blue Badge is a criminal offence and the County Council will continue to work alongside Sussex Police to monitor such activity. This may involve working on joint enforcement operations. Additionally, the County Council can work with local police teams in use of Community Resolutions as an educational tool and formal warning to deal with low level misuse.

### **Day-to-day enforcement inspections**

CEOs can play an important part in identifying lost, stolen and fraudulent badges. Whenever a CEO suspects misuse or abuse of a badge, they will deal with the badge holder in a sensitive manner. CEOs undertaking this role will have been trained to an appropriate level in disability awareness.

### **Withdrawing badges due to repeated misuse**

District and Borough Councils can withdraw a Blue Badge if the holder has had a relevant conviction for misuse. They can also request the return of a badge if they are satisfied that it was falsely obtained. They will also issue a warning notice to a badge holder who is misusing a badge, or allowing their badge to be misused, before considering withdrawing the badge.

### **Reciprocal arrangements for disabled drivers from other countries**

Currently the UK has reciprocal arrangements with all European Union Member States for use of Disabled Person's Blue Badges. These give badge holders the right to parking concessions provided in the host country by displaying a badge issued under their own national scheme.

Although the County Council currently does not know whether these or new national reciprocal agreements will be in place after the UK leaves the EU, in West Sussex, CEOs will continue to treat vehicles displaying the Blue Badge of a participating EU country as if it were displaying a UK Blue Badge. If a vehicle displays a Blue Badge equivalent from a country outside of the EU, then the Blue Badge exemptions need not apply unless the County Council has agreed to recognise badges from that country. However, it is acknowledged that the general obligation in the Equality Act still applies if a vehicle is believed to be used by a disabled person. The County Council will take great care to ensure that it meets its obligations.

### **Parking Provision for Blue Badge Holders**

Within a CPZ, resident blue badge holders may be issued with a free first Resident's Permit. They may also be entitled to a mandatory on-street disabled bay (backed up by a traffic regulation order and enforced by Civil Enforcement Officers), subject to an application process. Blue Badge holders may not park in permit-holder only bays in a CPZ unless they have a resident or visitor's permit.

Elsewhere, outside of a CPZ, advisory disabled bays may be provided, subject to application. These are not supported by a traffic regulation order and are reliant upon consideration from other road users not to abuse the disabled parking bay. In most situations this enables the most efficient response to a request for a disabled bay and the advisory nature of the bay is respected by most road users. That said, the County Council is investigating whether there is merit in supporting more/all of these bays with a traffic regulation order so that enforcement can take place.

In town centres, in accordance with the national concession, Blue Badge Holders may use charged on-street parking and free limited waiting bays without charge and without time limit, unless there are signs indicating to the contrary, and on yellow lines for periods of up to 3-hours.

In order to maintain access to shops and services for Blue Badge Holders, disabled bays are provided at key access locations in town and village centres.

Separate guidance exists to inform decision makers of the requirements of disabled people when considering planning proposals for new developments.

Policy IPS 11 The County Council will promote improved access for Blue Badge holders through the provision of designated on-street spaces and by working with the owners of off-street car parks to ensure that well designed spaces are provided

### **3.3.10 Additional Enforcement Powers within the Traffic Management Act**

#### **Regulation 10 Penalty Charge Notices**

Regulation 10 of the Traffic Management Act 2004 (TMA) allows a Penalty Charge Notice (PCN) to be sent in the post to the registered keeper/owner of a vehicle. This can be used when a Civil Enforcement Officer (CEO) is unable to affix the PCN to the vehicle. This is not a new contravention but just a new way of issuing a PCN and it can be implemented in two ways.

- a) If the CEO attempts to serve the completed PCN by affixing it to the vehicle but is prevented from doing so by someone or is unable to serve the PCN due to the vehicle being driven away
- b) If the CEO begins to write the PCN but the vehicle is driven away before the PCN can be served.

Regulation 10 PCNs for on-street parking contraventions have been issued by District and Borough Councils in West Sussex since April 2018 although the County Council has decided only to apply option a).

PCN's being sent in the post demonstrate that anyone committing a parking contravention is subject to the same enforcement response. Continuing with this approach should reduce the number of evaded PCNs and promote increased compliance with the on-street regulations. This in turn should contribute to improving road safety, reducing public transport journey times and reducing congestion.

## **Use of CCTV**

The Traffic Management Act also allows for enforcement of parking contraventions by CCTV cameras. Various other acts and regulations allow councils to install structures and equipment on or near a highway for the detection of contraventions of TROs. Councils may use the information provided by that equipment to serve a PCN (by post) on the registered keeper of a vehicle which contravenes the TRO.

The County Council will examine the feasibility of CCTV enforcement, particularly in relation to parking contraventions outside of schools. School parking enforcement builds upon the work delivered through Safer Routes to School, Road Safety Education and School Travel Planning as part of the County Council's wider approach to Behavioural Change. The main objectives are to build confidence in sustainable travel for the journey to and from school by protecting key access points to schools, improving visibility and reducing the potential of casualties. Most importantly, enforcement is used to deal with poor and illegal parking behaviours around school gates at drop off and pick up times, which directly addresses common issues raised by school communities.

If camera enforcement in West Sussex is to progress, the objectives behind it and the rules by which it would be operated would need to be made absolutely clear to stakeholders and the public. A Code of Practice would need to be prepared that ensured that issues such as privacy, integrity and fairness were properly dealt with. This would also set a minimum standard to be adhered to by the County Council for enforcing TROs using CCTV cameras to ensure public confidence in the scheme.

## **Bus Lanes**

In addition to its parking enforcement powers, the County Council has the power to enforce bus lanes under the Transport Act 2000 although it has not yet decided to enact this power. For the time being bus lane enforcement remains the responsibility of Sussex Police.

The County Council will examine the feasibility of bus lane and bus gate enforcement as part of a programme of measures to reduce congestion and pollution, and to improve the reliability and punctuality of public transport. The aim of enforcement would be to give priority to certain groups of road user by excluding others during prescribed hours.

## **Double Parking and Dropped kerbs**

The TMA also enables authorities with CPE powers to enforce prohibitions of double parking and parking at dropped footways without the need for a TRO or traffic signs. The purpose of these powers are to help prevent inconsiderate and selfish parking causing congestion and road safety problems.

Parking more than 50cm from the edge of the carriageway may not cause problems for smaller vehicles, but can obstruct the passage of ambulances, fire engines, buses, waste collection vehicles and other essential vehicles. The contravention of double parking applies when a vehicle parks on any part of the carriageway and no part of the vehicle is within 50 cm of the edge of the carriageway, subject to the exemptions in part 6 of the TMA.

Parking alongside a drooped footway can cause considerable inconvenience to vehicles trying to enter/leave a premises but it can also put vulnerable road users at greater risk of being involved in a road traffic accident.

The contravention of parking adjacent to a dropped footway applies where a vehicle parks on the carriageway next to a place where the footway, cycle track or verge has been lowered to the level of the carriageway (or where the carriageway has been raised to the level of the footway, cycle track or verge) to assist pedestrians crossing the carriageway, cyclists entering or leaving the carriageway or vehicles entering or leaving the carriageway across the footway, cycle track or verge.

The County Council will examine the feasibility of double parking and dropped kerb enforcement. If the powers are to be applied, they will need to be clearly communicated to the public and used reasonably and with circumspection. Ideally, they would only be taken if a vehicle was causing or likely to cause a road safety hazard or obstruction to other road users or pedestrians. Restrictions on the situations in which an authority can use these powers mean that they may be more suitable for tackling persistent problems than occasional ones.

### **Vehicle Removal**

The County Council has the power, under the TMA, to operate the removal of vehicles that are parked in contravention of the parking regulations but has decided not to enact these powers to date.

Consideration will be given to vehicle removal in cases where a vehicle is causing a serious hazard or obstruction or where it is preventing essential highways works (i.e. resurfacing) from being undertaken. Vehicle removal could also be considered in cases where a vehicle is subject to numerous PCNs (i.e. a persistent evader) or where it is untaxed.

Other agencies, including the Police, the DVLA and Enforcement Agents acting under the jurisdiction of a County Court, may operate removal of vehicles under separate powers and without the need for the County Council's consent or approval.

### **The Continuing Role of Sussex Police**

Under CPE the police service has been specifically excluded from yellow line parking enforcement although it retains responsibility for certain non-yellow line parking offences:

- Those offences for which a motorist can receive endorsements on their driving licence, such as dangerous parking, obstruction, and for failure to comply with police 'no parking' signs placed in emergencies;
- Moving traffic offences and infringements, including bus lane enforcement;
- Acting against any vehicle where security or other traffic policing issues are involved, including parking enforcement at Gatwick Airport and the need to close roads or set up diversions; and
- All parking restrictions on roads outside CEAs (including the trunk roads and high speed roads).

The County Council will continue to work closely with Sussex Police.

Policy IPS 12 The County Council will give consideration to moving traffic enforcement as well as to widening its parking enforcement powers in order to improve compliance, improve road safety, reduce public transport journey times and reduce congestion.

### **3.3.11 Technology and Innovation**

We are now considered to be a 'Smartphone Society' with Ofcom reporting that 76% of adults own a Smartphone. Smartphones have overtaken laptops as the most popular device for getting online with faster 4G connections helping change the way people make transactions and communicate. In-car technology and connectivity have also seen unparalleled growth in recent times with industry experts predicting that over the next 5 to 10 years vehicle transport will change more than it has in the last 100 years.

This surge in technology has extended to the parking industry which has resulted in convergence, development and innovation. Customers now expect to be able to access flexible and convenient services on-line and be able to make quick and easy parking transactions when using parking facilities

Technological developments have the potential to improve the service that is offered to customers as well as the effectiveness of managing that service. Developments that are currently being implemented by the County Council and/or being considered for the next five year period are detailed below.

#### **Pay & Display**

Pay & Display (P&D) is not new in itself, but the on-going development in technology is improving the customer interface, payment systems and the quality of data that is available for parking management. The County Council currently operates P&D in all of its CPZs and has established a replacement/upgrade programme (whereby existing cash only machines will be upgraded to take cash/card/contactless payments) in order to improve the accessibility and transparency of its on-street parking, reduce cash collection and on-going upgrade/repair costs as well as give customers a better experience

As processing power and screen technology improves, it becomes easier to present instructions and information on larger and clearer screens and in a range of languages. So newer machines will benefit users in West Sussex, where the population demographic varies and where there is a developed tourist economy.

The development of the internet, of .net computer platforms and mobile phone networks has already led to much easier networking of on-street equipment across mobile phone networks. This has allowed all P &D machines in West Sussex to be linked to their operational base and for the machines to send data reports and alerts. The management of the equipment becomes much more effective as an operator may respond to an alert (i.e. to empty a machine's cashbox or to refill its ticket roll) when it is necessary to do so rather than check each machine on a daily (or more frequent) basis. This also creates a log of any mechanical breakdown enabling a faster response time

and thereby reducing lost revenue. A record of breakdowns can also be cross-referenced to provide evidence to defend parking appeals when it is claimed that a machine was not operational.

Networking also allows a flow of data that can be analysed to determine parking patterns and to identify parking trends. This becomes a powerful modelling tool when the data from the on-street and off-street environments are combined in a single back-office system. Integrating on-street systems with those of the District and Borough Councils enables the County Council to gain a more comprehensive understanding of parking behaviour across a town centre and to understand patterns in more detail i.e. parking bay turnover. In the future, this data will provide a better tool for modelling changes in parking controls or parking charges.

### **Mobile Phone Payments**

There is little doubt that a significant proportion of the population have mobile phones that are able to make payments for parking and that many are willing to do so. However, the rapid growth in mobile phone payments has predominantly been in off-street car parks and on-street in London. In both of these situations, the parking charges are of a level that justifies the payment of a transaction fee by the customer. To date, the County Council has been of the view that payment of a transaction charge would not be attractive in West Sussex where charged parking is predominantly short stay (1 hour max) and the associated charges are relatively low.

There are some notable exceptions where mobile phone payments might be taken up more readily. These include parts of the Billingshurst CPZ and hotel parking areas in The Steyne and Steyne Gardens in Worthing town centre. The County Council will examine options to pilot the introduction of mobile phone payment technology in these locations as well as others emerging via the RSA programme.

### **Virtual Permits**

These can be issued to customers who submit an online permit application and attach scanned supporting documentation. Once an online authorisation has been granted for the permit and payment has been made, the permit can be added to a database of current virtual permits. On-street enforcement staff are then able to interrogate the database to check whether a vehicle holds a valid permit.

The benefits of virtual permits are the ease of application and rapid authorisation of a live permit without requiring a bureaucratic administrative process and the necessity for customers to wait for a physical permit to arrive in the post. The ease of holding data on a database removes problems of permits that fall off windscreens or get stolen, changing permits when changing vehicles and updating details when residents change addresses.

The County Council is currently examining options to introduce virtual on-street permits across the county.

### **Back Office Centralisation**

Developments in 'cloud' computing provide the opportunity for greater centralisation of the back office systems used by the District and Borough Councils for the management of CPE. Centralisation can provide a single system, hosted by the system provider – on a 'cloud' – and accessed via the

internet. Partitioning the system protects each council's data whilst the County Council has access to view headline data across all sites. This greatly improves access to data for monitoring and reporting and facilitates the unification of equipment, such as handheld computers, and stationery – providing greater purchasing power, increasing efficiency and reducing costs.

The County Council will ensure that a single cloud based system is in place across West Sussex by the end of 2020.

### **Ultra-Low Emission Vehicles (ULEV)**

The Government sees ULEVs as 'a vital part of the government's plans for a modern transport system that promotes economic growth whilst benefiting the environment'. Whilst ULEVs in themselves do not contribute to reducing congestion on the network they can impact positively on lowering emissions and pollution in cities.

Vehicles include hydrogen fuel cell and electric (plug in) vehicles for both private and commercial use. These require an effective recharging infrastructure to encourage the technology to develop and for the vehicles to be used more widely.

It is recognised that the majority of vehicle charging is likely to be undertaken at home and in the workplace which currently makes a significant public recharging infrastructure uneconomic. The Government has instead proposed that public infrastructure be targeted at key destinations such as supermarkets, retail centres and car parks. They have further suggested that there should be a focused amount of on-street infrastructure, aimed at residents without off-street parking.

On-street charging points may represent a potential future development in West Sussex but do not currently provide an economically viable option. Key to developing ULEV use will be on-street potential to provide a complimentary resource to investment by the private sector and to home charging technology.

West Sussex County Council will explore how Ultra Low Emission Vehicle charging points can be integrated with existing resources (in car parks and on-street) at an appropriate time, and in the first instance consideration will be given to supporting and encouraging the technology for car clubs. A partnership approach is likely to be the most appropriate one in developing this technology in the future.

### **Car Clubs**

Car Clubs have been established in Chichester and Horsham. Car Clubs enable people to make use of a vehicle when they need to rather than maintaining a personal vehicle. Car Club vehicles are parked in dedicated bays on-street thereby removing the need to search for a parking space. Short and long term hire options are available.

West Sussex County Council is committed to encouraging the development of car clubs, both on-street and in new developments. In this way the numbers of vehicles seeking to park in already



oversubscribed areas can be reduced. There is also evidence to suggest that car club members make more use of public transport, walking and cycling than people who own their vehicle.

### **Variable or Demand Responsive Charging**

Technology for variable pricing of parking has been explored, developed and piloted in San Francisco. The 'SFpark' system uses new technologies and policies to improve parking in San Francisco. The benefits are cited as follows:

- More parking availability makes streets less congested and safer.
- Meters that accept credit and debit cards reduce frustration and parking citations.

Smart pricing enables drivers in San Francisco to quickly find open spaces. To help achieve the right level of parking availability, SFpark periodically adjusts meter and garage pricing up and down to match demand. This 'demand-responsive pricing' encourages drivers to park in underused areas and garages, reducing demand in overused areas and helps to readjust parking patterns in the city so that parking is easier to find. The changes in pricing are always advertised in advance and the system works using an app/website so that drivers can plan ahead.

This approach to charging for parking may be considered in parts of West Sussex at an appropriate time. Should such a scheme be considered in the future it will be subject to full consultation in line with government advice

Policy IPS 13	The County Council will embrace technological innovations which help customers to better access services and aid the efficiency of parking operations.
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### **3.3.12 Financial and Operational Accountability**

CPE in West Sussex is a means of achieving transport policy objectives. Raising revenue is not an objective of CPE, nor will West Sussex CPE authorities set targets for revenue or the number of Penalty Charge Notices (PCNs) they issue. For good governance, West Sussex enforcement authorities need to forecast CPE revenue and expenditure in advance.

If a surplus is generated, the legislation does allow authorities to fund certain activities from a prescribed list and the County Council's practices are consistent with this legislation. The judgement in *R v LB Camden (ex parte Cran)* makes clear that the Road Traffic Regulation Act 1984 is not a revenue raising Act and this is a useful reminder in times of financial strain on local authority budgets.

West Sussex enforcement authorities will run their CPE operations (both on and off-street) as efficiently, effectively and economically as possible. The purpose of penalty charges is to dissuade motorists from contravening parking restrictions. The objective of CPE should ultimately be for 100 per cent compliance, with no penalty charges, however it is unlikely that it will ever reach this position. Parking charges and penalty charges are aimed to be proportionate, and so authorities seek not to set them at unreasonable levels. Any penalty charge payments received (whether for on-

street or off-street enforcement) must only be used in accordance with section 55 (as amended) of the Road Traffic Regulation Act 1984 and again this is a useful reminder in times of financial strain.

The Secretary of State will not expect either national or local taxpayers to meet any deficit and for this reason all CPE schemes in West Sussex have clear mechanisms to manage any projected deficits.

### **The On-Street Parking account**

On-street parking charges, which include pay & display and permit charges as well as penalties from CPE accrue to the County Council's On-Street Parking account. The costs and expenses associated with introducing, managing and maintaining on-street parking are all drawn from this account.

This account is managed in accordance with the requirements of the Road Traffic Regulation Act 1984, which sets out the purposes for which the County Council may levy on-street parking charges and how any surplus may be spent. It is important to note that parking charges may be levied for traffic management objectives and they are not to be made for the purpose of raising revenue. If a surplus is generated, the legislation does allow authorities to fund certain activities from a prescribed list. The County Council's practices are consistent with the legislation.

As a Highway Authority, the County Council's responsibilities are strategic as well as local and they extend across the entire County. As such, the County Council manages a single On-Street Parking account and we invest surpluses strategically across the County, irrespective of where they originated.

### **Reporting**

Clearly, reporting is an important part of accountability. The transparency given by regular and consistent reporting will help the public understand and accept CPE. Monitoring also provides the West Sussex CPE authorities with management information for performance evaluation and helps to identify where they might need to improve the CPE regimes. It provides a framework for performance comparisons between councils and this report includes a section showing the benefits that any net parking income has helped to pay for through the WSCC On-Street Parking Account.

In addition to providing regular performance reports to the County Council, West Sussex CPE enforcement authorities will produce an annual report about their enforcement activities. The report will be published and as a minimum it will cover the financial, statistical and other data necessary to illustrate the performance of the respective CPE schemes. The annual report will be developed over time to ensure that it is fully 'fit for purpose', transparent, easily understood and above all informative.

West Sussex CPE enforcement authorities will make annual returns to the Government about the number and speed of payment of PCNs. All West Sussex CPE authorities use the Traffic Penalty Tribunal which is an independent adjudication service and so they will also advise the adjudication service in a timely fashion how many PCNs they have issued.

West Sussex CPE authorities are seeking to develop and include information that will allow their performance to be assessed over time and measured against each other and also against other

comparable authorities. Each authority will publish the report on their website and place copies in civic offices and local libraries.

West Sussex CPE authorities expect benefits from collecting and comparing management information on other aspects of civil parking enforcement operations. Examples include the grounds on which representations and appeals are made, the number of CEOs employed or deployed, and perhaps the average number of appeals per officer.

Policy IPS 14 The County Council and the District/Borough Councils will be open and transparent about how the CPE Service works and how decisions are made. As part of this commitment, Annual Parking Reports will be published.

### **3.3.13 Best practice and Lobbying**

As the professional body representing the parking industry, the British Parking Association (BPA) represents both the public and private sector to inform and influence Government policy. As a member of the BPA, the County Council already supports the development of best practice within parking

The County Council will continue to be an enthusiastic supporter of the work that the BPA carries out not only on behalf of local authorities, but also the commercial sector. The resultant interface is vital in ensuring West Sussex remains up to date with developments particularly in technology and the industry as a whole.

The interface between the BPA and government, particularly with the DfT and the Home Office, is most valuable for it enables not only disparate local authorities to approach issues with one voice, but adds the weight of the business sector to representations. The inputs of the BPA to TMA operational guidance has proven valuable – work which continues today. Such lobbying causes government to consider matters presented to it with greater attention.

The County Council has been pleased to base its agency agreements on the BPA's model contract. Helpful in the case of Worthing which alone of all the districts and boroughs, decided to appoint a contractor to undertake enforcement (for which the model contract was originally designed), and elsewhere forming the core of service level agreements which detail the operational standards and responsibilities expected from each District and Borough.

The BPA has been instrumental in developing the City & Guilds course for the training of CEOs and the County Council requires each of its Districts and Boroughs to ensure their CEOs gain this qualification. There has also been an enthusiastic uptake in applications for Park Mark safer parking status in many of the off-street car parks operated by the District and Borough Councils.

As well as for its own interests, the County Council will continue to actively encourage its Districts and Boroughs to participate in the various exhibitions, seminars and workshops offered by the BPA. The Local Authority Special Interest Group (LASIG) is an excellent national forum for networking and exchanging news and views. The Regional Groups likewise provide opportunities for members at a more local level.

It is vital that all local authorities keep abreast of issues such as the fraudulent use Blue Badges, developments with the Traffic Enforcement Centre handling of registrations and warrants, and best practise with regard to bailiffs. The experiences of other authorities in having adopted cashless parking, ANPR and CCTV technologies are recent examples of important learning for the County Council.

The County Council is a champion of firm but fair enforcement and for transparency in all aspects of parking enforcement – qualities which it is pleased that the BPA also supports on behalf of all in the industry, for example, through its development of best practice guidelines on producing the CPE Annual Report and the consumer’s guide to parking. The County Council will therefore continue to support the BPA’s work and have no hesitation in recommending active membership to all those engaged in the parking industry.

Policy IPS 15	As a member of the BPA, the County Council will continue to add its voice to those of other local authorities when lobbying Government or responding to government consultations on parking issues.
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### 3.4 IPS Action Plan 2020 – 2025

IPS Policy	IPS Objectives Met	Specific Actions	Timescales	Monitoring
<p>1. The County Council, together with the District and Borough Councils, will take all reasonable steps to provide a cost-effective and efficient parking service.</p>	<p>Traffic Management Community Economic Health and Wellbeing Location Enforcement Financial</p>	<p>Undertake a comprehensive review of the County Council’s CPE service</p> <p>Introduction of a new back office case management system (Chipside)</p>	<p>Draft report expected Spring 2020</p> <p>Chipside to be introduced countywide by December 2020</p>	<p>On-going</p>
<p>2. Civil Parking Enforcement will be quality based and information readily available to help road users understand that enforcement is as fair, accurate and expeditious as possible.</p>	<p>Traffic Management Community Economic Health and Wellbeing Location Enforcement Financial</p>	<p>Publication of the County Council’s IPS and Parking Policy as well as the District and Borough Council Annual Parking Reports</p> <p>Production (internal) of CPE performance reports for each District/Borough. With key information to be fed into annual parking reports.</p>	<p>To be published by March 2021. Annual Reports to be re-published every March.</p> <p>Quarterly</p>	<p>On-going</p>
<p>3. Parking signing and lining defects will be corrected as soon as possible after being reported.</p>	<p>Traffic Management Economic Enforcement</p>	<p>Quarterly review (internal) of sign/line defect expenditure as well as PCN cancellations attributed to sign/line defects</p>	<p>Quarterly</p>	<p>On-going</p>
<p>4. Parking management in town centres and around other attractors will seek to balance the needs of the various competing user groups and</p>	<p>Traffic Management Community Economic Health and Wellbeing Location</p>		<p>On-going</p>	<p>On-going</p>

maintain the economic viability of those areas.	Enforcement Financial			
5. Management of all on-street parking spaces should complement other transport and planning policies to discourage car use in congested urban areas	Traffic Management Community Economic Health and Wellbeing Location Enforcement Financial	Parking Standards Review  Review of internal processes related to Section 278 agreements  Review of permit eligibility criteria for new residential developments located within CPZs	During 2020  During 2020  During 2020	On-going  On-going  On-going
6. Parking charges will be levied for traffic management purposes - to maximise capacity by stimulating turnover, encourage the use of off-street car parks and to act as a demand management tool.	Traffic Management Economic Location Enforcement Financial		On-going	On-going
7. Parking charges will be reviewed regularly and set at an appropriate level to cover operating costs and influence parking demands, consistent with traffic management and environmental objectives.	Traffic Management Economic Location Enforcement Financial	Undertake countywide on-street parking charges review	Changes to be implemented each September	On-going
8. CPZs will be periodically reviewed to ensure that they are achieving the desired effect and responding adequately to any changes in parking activity that may have	Traffic Management Community Economic Health and Wellbeing Location	Additional parking provision for Blue Badge holders as well as motor cycles will be provided where possible.	As and when required	On-going

arisen since the last time they were reviewed.	Enforcement Financial			
9. Road Space Audits will be made available as the primary approach to parking management across West Sussex.	Traffic Management Community Economic Health and Wellbeing Location Enforcement Financial	Undertake RSA projects in Chichester, Crawley (including Manor Royal), Burgess Hill, Shoreham, Horsham and Worthing.	In accordance with the RSA programme	On-going
10. Verge and footway parking TROs may be implemented to prevent or prohibit parking that causes damage to the verge and/or footway or that causes an obstruction to other road users.	Traffic Management Community Enforcement	Undertake feasibility study relating to a road specific or area wide footway parking ban (dependent on location)	During 2020	On-going
11. The County Council will promote improved access for Blue Badge holders through the provision of designated on-street spaces and by working with the owners of off-street car parks to ensure that well designed spaces are provided	Traffic Management Community Health and Wellbeing Location	Undertake feasibility study relating to supporting advisory disabled bays with traffic regulation orders	During 2020 and In accordance with RSA/CPZ programme.	On-going
12. The County Council will give consideration to moving traffic enforcement as well as to widening its parking enforcement powers in order to improve compliance,	Traffic Management Health and Wellbeing Location Enforcement	Feasibility study relating to CCTV enforcement of School Keep Clears and Bus Stops outside schools (dependent on location)	During 2021	On-going

<p>improve road safety, reduce public transport journey times and reduce congestion.</p>		<p>Feasibility study relating to CCTV enforcement of Bus Lanes/Gates</p> <p>Feasibility study relating to the enforcement of double/drop kerb parking</p> <p>Feasibility study relating to operating vehicle removal</p>	<p>During 2020</p> <p>During 2021</p> <p>During 2021</p>	<p>On-going</p> <p>On-going</p> <p>On-going</p>
<p>13. The County Council will embrace technological innovations which help customers to better access services and aid the efficiency of parking operations.</p>	<p>Traffic Management Community Economic Health and Wellbeing Enforcement Financial</p>	<p>Implementation of On-Street Pay and Display upgrade programme (incorporating card and contactless payments)</p> <p>Introduction of virtual parking permits</p> <p>Introduction of a new back office case management system (Chipside)</p> <p>Provision for car clubs will be provided where appropriate.</p> <p>New TRO database (Parkmap)?</p>	<p>Replacement programme runs from 2020 – 2026</p> <p>During 2020</p> <p>System to be introduced countywide by June 2020</p> <p>As per CPZ review programme</p> <p>Date to be confirmed</p>	<p>On-going</p> <p>On-going</p> <p>On-going</p> <p>On-going</p>
<p>14. The County Council and the District/Borough Councils will be open and transparent about how the CPE Service works and how decisions are made. As part of this commitment, Annual Parking</p>	<p>Traffic Management Financial</p>	<p>All District/Borough Councils to produce an Annual Report</p> <p>County Council to produce annual statement of parking accounts</p>	<p>By March each year</p> <p>By June each year</p>	<p>On-going</p> <p>On-going</p>



Reports will be published.				
15. As a member of the BPA, the County Council will continue to add its voice to those of other local authorities when lobbying Government or responding to government consultations on parking issues.	Traffic Management		On-going	On-going

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