

Our Ref: RF/SA  
Your Ref:

21 November 2020

Baroness Vere of Norbiton  
Department for Transport  
Great Minster House  
33 Horseferry Road  
LONDON  
SW1P 4DR

Dear Baroness Vere,

### **UTG Response to DfT 'Pavement parking: options for change' consultation**

The Urban Transport Group (UTG) thanks the Department for Transport for the opportunity to respond to this consultation on pavement parking.

UTG represents the seven largest city region strategic transport bodies in England, which, between them, serve over twenty million people in Greater Manchester (Transport for Greater Manchester), London (Transport for London), the Liverpool City region (Merseytravel), Tyne and Wear (Nexus), the Sheffield City region (South Yorkshire Passenger Transport Executive), the West Midlands (Transport for West Midlands) and West Yorkshire (West Yorkshire Combined Authority).

Our members plan, procure, provide and promote public transport in some of Britain's largest city regions, with the aim of delivering integrated transport networks accessible to all.

We very much welcome the Government's ambition to tackle pavement parking.

Pavement parking restricts independent mobility for a wide range of groups, particularly people with certain disabilities, children and young people, and parents with buggies, all of whom require pavements of an adequate width and free of obstruction. Women are also disproportionately affected being more likely to walk as well as more likely to have primary caring responsibilities.

Pavement parking frequently forces pedestrians to step out into the road, putting them at risk of injury or death from motor traffic. The obstruction caused also reduces sightlines, making crossing the road dangerous, particularly for children and young people who can be rendered invisible behind parked cars.

Parking degrades pavement surfaces and verges, increasing the costs of maintenance as well as the likelihood of trips and falls.

By contributing to a wider sense of motor vehicle dominance as well as reducing accessibility, pavement parking discourages walking and all the many benefits it brings for the economy, health, wellbeing and the environment. Living Streets research into 'The Pedestrian Pound', for example, shows that footfall increases 20-35% on streets where the pedestrian experience has been improved and, for well-designed projects, sales can increase by 30% as a result.

Pavements free of parked cars are accessible, safe and inclusive and encourage more walking and physical activity. Reducing pavement parking also helps create the conditions for green, resilient streets, opening up opportunities for street greening and freeing up space for electric vehicle charging infrastructure.

In England outside of London, the current regime for implementing restrictions on pavement parking is unduly onerous, time consuming and costly – we agree that reform is needed.

The consultation presents three options for change. We do not believe that Option 1 alone will be sufficient to tackle pavement parking and so our response focuses on the relative merits of Options 2 and 3.

We recognise that Option 3 has worked well in London and we echo the call of our member, Transport for London, for the Government to ensure that - whatever decisions are made following this consultation with regards to the rest of the country - the pavement parking ban is preserved in the capital.

Option 3 has the benefit of providing clarity and parity across England. It would be easy to understand and less open to interpretation and challenge. However, outside of London the costs of implementing the approach from scratch far exceed the resources available to local authorities as well as any likely income from fixed penalties.

Implementing Option 3 would involve auditing every street and – if a street was exempted from the ban – signage and other infrastructure would be needed. Many streets would need to be excluded, for example, large numbers of traditional streets of terraced housing where alternatives to pavement parking would be unworkable.

With these constraints in mind, we support Option 2 for areas outside of London. Option 2 provides local authorities with the power and flexibility to tackle pavement parking as and when they find it, in a way that is appropriate to local needs and circumstances. Option 2 therefore aligns well with the principles of devolution. It is also the most practical option given limited local authority resources. However, careful thought will need to be given to defining pavement obstruction to provide clarity for the public and enforcement officers and minimise challenges and appeals.

As acknowledged in the consultation document, it is difficult to arrive at a definition of 'unnecessary obstruction of the pavement' that would cover all possible circumstances. Leaving a width of at least 1.5m is, of course, the ideal but unattainable on many pavements, even without the presence of parked cars. Defining 'unnecessary' is particularly problematic as it is very much open to interpretation and therefore challenge. It is relatively easy to see when a pavement is being obstructed but less easy to determine whether that obstruction was avoidable and therefore unnecessary.

Members of the public and civil enforcement officers require a national definition of what constitutes an 'unnecessary obstruction of the pavement' that is clear and simple to

understand on the ground. Arriving at such a definition will need careful thought and further consultation, including with the legal profession. One relatively straightforward example of unnecessary obstruction would be parking on shared footways and cycleways adjacent to a carriageway.

A public awareness raising campaign would also be needed in advance of the new offence being introduced in order to explain what 'unnecessary obstruction of the pavement' means and highlight the need to park with consideration for the movement and safety of others.

Restrictions on pavement parking should go hand-in hand with wider measures to prevent the problem happening in the first place, including:

- Measures to invest in viable, attractive alternatives to car use and car ownership including walking and cycling infrastructure; behavioural change interventions; public transport; park and ride facilities; and car sharing.
- Reversing the trend towards ever larger cars and SUVs which take up more space and render pedestrians, particularly small children, invisible and therefore in danger.
- Incorporating off-street loading bays into new office and retail developments.
- Encouraging greater consolidation of deliveries to minimise the number of vehicles servicing residential and commercial areas.
- Greater use of cargo-cycles for last mile deliveries to reduce pavement parking by delivery vans.

If we can be of any further assistance or if you require any additional information, please do not hesitate to get in touch.

Yours sincerely,

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