

Penalty Charge Notices in the South London FQP area

Study report



Prepared by



On behalf of:



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Penalty Charge Notices in the South London FQP area

Survey report

Prepared by



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Consultants' statement

The views expressed within this report are those presented by stakeholders consulted during the study and of the consultant team, which undertook the project.

Similarly the conclusions and recommendations presented within this report are those developed by the consultant project team.

EXECUTIVE SUMMARY

This study was commissioned by the South London Freight Quality Partnership at the request of the Transport for London Freight Unit, as a part of its 2007/08 activities to work with industry partners to identify the Penalty Charge Notice (PCN) hotspots that cause them most difficulty within the South London FQP area.

Increased provision of legal loading opportunities will result in reduced road congestion, fewer accidents and conflicts with other road users, less noise and an improvement in environmental performance. A reduction in the number of PCNs issued will improve business efficiency and hence support the economy of South London.

The methodology used is a tried and tested mixture of observation, consultation, survey and analysis leading to recommendation and implementation in conjunction with Borough officials. The incorporation of our commercial partners' data in the selection of sites adds weight to the process.

Primary aspects of this research involved analysing and summarising how PCNs were issued in the South London FQP area, and what the local policies regarding them were. The second element of interest of this research consisted of identifying the main PCN hotspots regarding loading/unloading operations.

The key objectives of this research were to:

- Provide feedback on how parking management works in London and conduct a comparative analysis between boroughs regarding the number and the reasons for issuing PCNs.
- Identify the main locations where PCNs are issued involving loading/unloading operations
- Analyse PCN management systems on a Borough by Borough basis, to identify how PCN data are captured and what is expected in the future.
- Determine the key drivers for a reduction in the number of PCNs issued in the South London FQP area and the required changes for upgrading PCN systems.
- Identify the potential barriers to upgrading the PCN capture system.
- Make recommendations as to how PCN data capture systems could be upgraded.

In London, the Road Traffic Act 1991 mentioned that a penalty charge notice must state:

- the grounds on which the parking attendant believes that a penalty charge is payable
- the amount
- time to pay it
- possible reduction in price
- the address to which to send the payment.

In general, when London boroughs issue PCNs, they include additional information such as the location the PCN was issued and the colour or the make of the vehicle.

However, Boroughs admit that this additional information is sometimes inaccurate as it is sometimes partially completed by parking attendants. However, as gathering this additional information is not compulsory drivers who received a PCN can't challenge it regarding this issue.

In 2006, more than 5 million PCNs were issued in the Greater London area, of which, more than 700,000 were issued in the South London FQP area. It is often very difficult to distinguish whether loading / unloading operations are in fact underway i.e. while the driver is away from the vehicle, or if the vehicle has been left parked either in loading bays or as an overstay after legitimate (un)loading on a yellow line. The current list of codes used by parking attendants which categorizes the nature of the prosecution does not allow identification of whether a PCN was issued to a commercial vehicle parked in a bay (overstay / no evidence of delivery staff actually loading / unloading at the time).

It was observed that the number of PCNs which are appealed against is quite often related to the codes used to issue PCN. Indeed when they were consulted, local authorities and businesses said that PCNs issued under Code 25¹ were generally successfully challenged. It is often contested as it is quite easy to prove that delivery staff were operating when the PCN was issued. On the other hand, Codes 02² or PCNs issued on Red Routes are rarely contested.

Each Borough uses a different system to issue PCNs and they can differ greatly from one Borough to another; 4 different systems were identified in this research. Those systems are chosen by local authorities when they negotiate their contract with parking enforcement operators. Some Boroughs expressed their wish to develop an agreed format for collecting the data across all Boroughs; some work in-house and some outsource this service. As a result, as different systems are used, prosecutions vary from one Borough to another.

On-site observation is one of the most used techniques to enforce PCNs, followed by CCTV. For example, in the London Borough of Richmond-upon-Thames, 78% of the PCNs are issued as a result of observations. However, when they were consulted many Boroughs think that CCTV is a positive way to enforce loading bays.

Consultation in Autumn 2007 showed that no Borough in the South London FQP area used a geocode system when they issued PCNs at that time.

We also found that some Boroughs did not see the reason for TfL having an influence in the way they choose to upgrade their PCN data capture; they think that as TfL has no power over yellow lines on Borough controlled roads, they shouldn't be involved in such an upgrade of their PCN systems.

The attitude of local authorities towards upgrading their PCN data capture methods varies from Borough to Borough. Some Boroughs said they did not see a real benefit in upgrading their system as that they work closely with retailers and they study problems on a case by case basis when PCNs are appealed. Incidentally they do not see the benefit of having more information than they will have time to deal with. But

¹ Code 25 indicates that a loading place is used during restricted hours without loading

² On street. Parked or loading/unloading in a restricted street where waiting and loading/unloading restrictions are in force.

for some others (including Croydon, Sutton, Wandsworth and Richmond) said they might be interested in pursuing this idea further although it is not their main priority. In addition some raised concerns about parking attendants being able to establish loading and unloading operations. As a result we think it could be interesting to work with those boroughs that are interested in upgrading their system in 2008/09.

The last, but not least, step of this research consisted of identifying PCN hotspots in the South London FQP area.

The results of this research identified 2 types of sites:

- Sites where we just know the street:
 - Bromley Market Square
 - The Broadway, Tolworth (Kingston)
 - Fife Road, Kingston
 - Deptford High Street, Lewisham
 - St Margaret Road, Twickenham (Richmond)
 - Beddington Gardens, Sutton
 - Wimbledon Village, Merton
 - Northcote Road, Wandsworth.

- Sites where we had detailed information about locations³:
 - Croydon High Street

The key barriers potentially limiting the upgrade of the PCN system and the key measures necessary to overcome some of these barriers have been identified:

- There is a need to train parking attendants as to how urban freight works and delivery staff about how local authorities work. The consultation showed that businesses complained about not being listened to or understood in their activities and that in parallel it was sometimes difficult for parking attendants to distinguish loading and unloading operations. As a result we propose that training is offered, within the framework of the South London FQP, in order to manage 'courses' with parking attendants from the 8 boroughs and local businesses. There is a real need for a close working relationship between Parking services, Planning and Environment services of local authorities.

- Upgrading some PCN data system integrating information presented in table 4.3 (provided by TfL). These systems should include as a core element:
 - the vehicle category,
 - if the PCN is freight related
 - a geographic identifier (geocode) system.In addition we think that it could be interesting to build a flag into the PCN issuing machine that prompts the parking attendant to confirm whether the vehicle that is occupying a loading bay is a delivery vehicle or not.

³ That means that we exactly know where problems with PCNs are (number of the street, in front of which store, house...)

- Develop an agreed and unified format for collecting the PCN data across the London Boroughs. This idea should be developed at a London-wide view.
- Before updating the restrictions, it is essential to understand the logistics patterns of the operators and explain to them the requirements of the residents and general public.
- It would be interesting to follow up the hotspots revealed in this research and see if there is a positive feedback of using the new systems to reduce the number of infractions.

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1. INTRODUCTION & BASELINE

1.1 The National and Regional Context – Penalty Charge Notices

The *Road Traffic Act 1991* and the *Traffic Management Act 2004* permit local authorities to apply for the legal power to take over the enforcement of on-street, as well as off-street car parking regulations from the police. Penalty Charge Notices (PCNs) are distinguished from other Fixed Penalty Notices⁴, by lacking the support of criminal prosecution if the penalty is not paid.

In London, levels of penalty charges may be changed by the London local authorities or, with respect to the Greater London Authority (GLA) roads and GLA side roads, Transport for London, subject to the approval of the Mayor of London and no objection to the changes being expressed by the Secretary of State.

In 2007, London Councils⁵ encouraged local authorities throughout Greater London to increase the time authorised to load and unload on yellow lines (where it is permitted) from 20 to 40 minutes. The '*40 minute policy*' for loading and unloading was originally discussed at a Parking Managers' seminar at London Councils and that it was more than simply a report recommendation.

Reports to the Transport and Environment Committee (TEC) have been written so that the recommendations are for the committee to adopt the proposals. In essence, the '*40 minute*' policy only becomes statutory if / when the relevant Traffic Management Orders (TMOs) are updated; this process depends on the authorities' internal procedures.

Eventually all Boroughs should change their TMOs and enforcement of the 40 minute rule will be a matter for the Boroughs themselves. This rule only applies when yellow lines (single or double) are in operation, and neither on loading bays (which are subject to specific conditions) nor on Red Routes (where it is completely prohibited).

The Road Traffic Act 1991 and the Traffic Management Act 2004 state that local authorities have long been responsible for managing, directly or indirectly, all on-street and some off-street parking. Authorities are also responsible for enforcement and should set and appraise regularly:

- The optimum level of compliance with parking controls
- The level of enforcement necessary to secure such compliance
- The levels of penalty charges
- The need to resource the operation effectively and ensure that all parking staff are appropriately trained.

⁴ Fixed Penalty Notices are originally used by police and traffic wardens and their use was extended to other public officials and authorities, as has the range of offences for which they can be used.

⁵ London Councils federates boroughs.

1.2 Context of the Study

Since September 2006, the South London Freight Quality Partnership has been working to develop solutions for improvements to loading and unloading conditions in the South London FQP area in conjunction with local stakeholders. Improved loading operations and enforcement will result in reduced road congestion, fewer accidents and conflicts with other road users, less noise, a higher quality of work from delivery staff and an improvement in environmental performance. A reduction in the number of PCNs issued will improve business efficiency and support the economy of South London.

In this research the South London FQP has worked with local authorities, businesses and Transport for London (Freight Unit) to identify the PCN hotspots that cause most difficulty within the South London FQP area. The consultation has emphasised to business the importance of proper delivery practices and the significance of freight transport to the functioning of the urban area. For the initial part of this research, it was necessary to draw on localised issues and problems to identify the main "PCN hotspots" in South London. At the same time, TfL is currently working on a London-wide review of PCN hotspots (in the context of delivery vehicles for the purposes of the London Freight Quality Partnerships).

TfL and the South London FQP borough members also wanted to know how PCN data processes for freight vehicles worked in all boroughs.

2 METHODOLOGY

2.1 Project Management

A methodology was proposed by TTR and validated by the client group at the start of the project.

The project client group consisted of the South London FQP Steering Group and Transport for London (Freight Unit).

The project officially started in September 2007 and was agreed to be finished end of March 2008.

Project updates were given at the South London Freight Quality Partnership steering group meetings which took place on September 3rd 2007, January 16th and March 26th 2008. Furthermore, management reports were sent every month to the Client manager.

The method used for this research is a tried and tested mixture of observation, consultation, survey and analysis leading to recommendation and implementation in conjunction with Borough officials. The incorporation of commercial partners' data in the selection of sites adds weight to the process.

2.2 Methods Used

For the initial part of this research, the South London FQP drew on localised issues and problems to help identify the main 'PCN hotspots' in the area. Questionnaires were sent to local authorities and businesses to identify the locations of the main PCN hotspots in the South of London during summer 2007.

In addition, a Legal Loading Initiative Forum was organised in October 2007 with local authorities, Freight Transport Association, London Councils and Transport for London to discuss the '40 minute rule' and methods used by local authorities to issue Penalty Charge Notices.

The methodology used to meet the requirements of the study was based on five main stages:

- ***Analysis of the current PCN system process***

This part involved detailing the history of the PCN system in order to understand how loading / unloading offences were considered in the current PCN process.

A brief overview (press / Internet review) was included to have an informal view of what retailers / drivers thought about PCNs issued for loading and unloading offences.

- ***Feedback on the Legal Loading Initiative***

The Legal Loading Initiative (LLI) project, which was a part of the South London FQP activities, identified six hotspots around the South London FQP area where loading

and unloading were difficult. Recommendations were made and submitted to the boroughs involved before summer 2007. Within the LLI project, PCNs were analysed as a part of the process of developing a full understanding of freight activities. A more-in-depth analysis was carried out for each site and results were compiled to compare problems met by delivery staff.

- **Consultation with local authorities and businesses / Street inventory**

Questionnaires were sent to all boroughs involved in the SLFQP project to identify the locations of the main PCNs hotspots. Additional questionnaires were then sent to business members of the South London FQP. Those questionnaires included questions about the areas where PCNs were most frequently issued, the common official code or categorisation for the PCNs, reasons why PCNs were issued, the typical values of PCNs, the type of vehicles mainly concerned by PCNs, the appeals, etc.). The questions were designed to map the location of the hotspots and to gain a better understanding about where and why PCNs were issued.

Furthermore, contacts have been made with associations of businesses / retailers (for example, South London Business, British Retail Consortium etc...).

- **Site study**

The analysis of the questionnaires allowed the locations of the PCNs hotspots to be identified. More-in-depth research was then conducted on four sites including:

- Case by case analysis of the urban environment of the sites in question.
- Comparison of the number of PCNs issued for loading / unloading offences with the other offences.
- Identification of existing off-street loading / unloading and servicing areas and opportunities for improving these.
- Questioning some retailers and Borough officers (environment, planning, CCTV, transport teams + town centre managers).
- Final analysis of each local case.

- **Reporting and recommendations**

Following the analysis phase of the study, recommendations were made and incorporated in a study report. This section offered the opportunity to propose a series of measures to reduce the number of PCNs issued and to make them more efficient.

Transport for London and the South London FQP Steering Group were regularly informed of the current status of the research and discussion took place with them throughout the duration of the project.

3 PENALTY CHARGE NOTICES ISSUED IN LONDON

3.1 Overview of the Penalty Charge Notices issued in the Greater London

In 1998 Transport for London completed a major review of the levels of the PCNs in the Greater London area. The parking charges were adjusted, in the case of parking PCNs to ensure adequate deterrence, and in the case of other charges, to ensure Councils have their costs fully met by offending motorists.

According to the Road Traffic Act 1991, London Boroughs are responsible for setting charges for permitted parking in the Borough including:

- Parking permits
- Parking meters
- Pay-and-display
- Council owned car parks.

In addition, The Road Traffic Act 1991⁶ mentions that a penalty charge notice must state:

- the grounds on which the parking attendant believes that a penalty charge is payable with respect to the vehicle;
- the amount payable for the penalty charge
- that the penalty charge must be paid before the end of 28 days beginning with the date of the notice;
- that if the penalty charge is paid before the end of the 14 day period beginning with the date of the notice, the amount of the penalty charge will be reduced by the specified proportion; and that, if the penalty charge is not paid before the end of the 28 day period, a notice may be served by the London authority to the registered owner of the vehicle.
- the address to which payment of the penalty charge must be sent.

From 1st July 2007 all London Boroughs adopted a system of '*differential parking penalties*'. From this date the charge made for parking contraventions depended on the severity of the contravention with 'more serious' contraventions charged at a higher level than 'less serious' ones.

In 2006, the number of Penalty Charge Notices issued in Greater London – all types of codes included – was spread as follows⁷:

- Greater London area (excl. Red Routes): **5,075,478**
- London Red Routes (TfL): **304,305**
- Total Greater London: **5,379,783**
- South London FQP area: **707,128**

In 2006 the total number of PCNs issued in the South London FQP was relatively small in comparison with the PCNs issued in the whole Greater London (8 out of 33

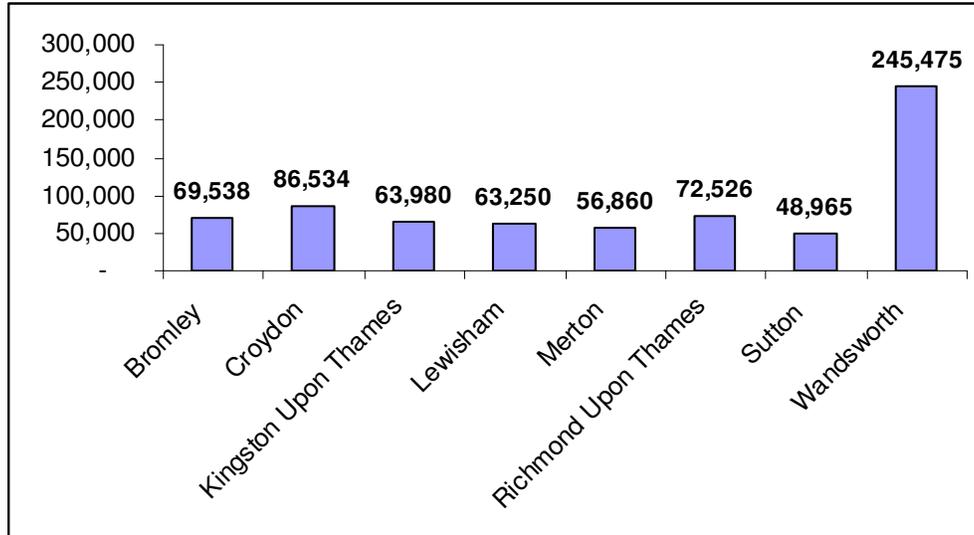
⁶ Road Traffic Act 1991, Part II – Traffic in London, Parking in London section, 66(3).

⁷ Data from London Councils, 2006.

boroughs represent **14%** of the total of the PCNs issued)⁸. The London Borough of Westminster⁹ is most affected by the PCNs issued (809,652 in 2006).

In 2006/07, total income before admin costs generated from parking tickets in London was £297.3 million¹⁰, and £112.6 million after admin costs. In the South London boroughs, parking tickets generated £51.1 million of income before admin costs and £18,100 of benefits after admin costs¹¹.

Figure 3.1: Number of PCNs issued in the South London FQP area in 2006



Amongst the Boroughs located in the South London FQP area, Wandsworth is the SLFQP member Borough the most affected by the number of PCNs issued with 35% of the total of PCNs issued in this area. Except for Wandsworth, there is a relative balance between the other boroughs regarding the part they represent in the number of PCNs issued (between 7% (Sutton) and 12% (Croydon)).

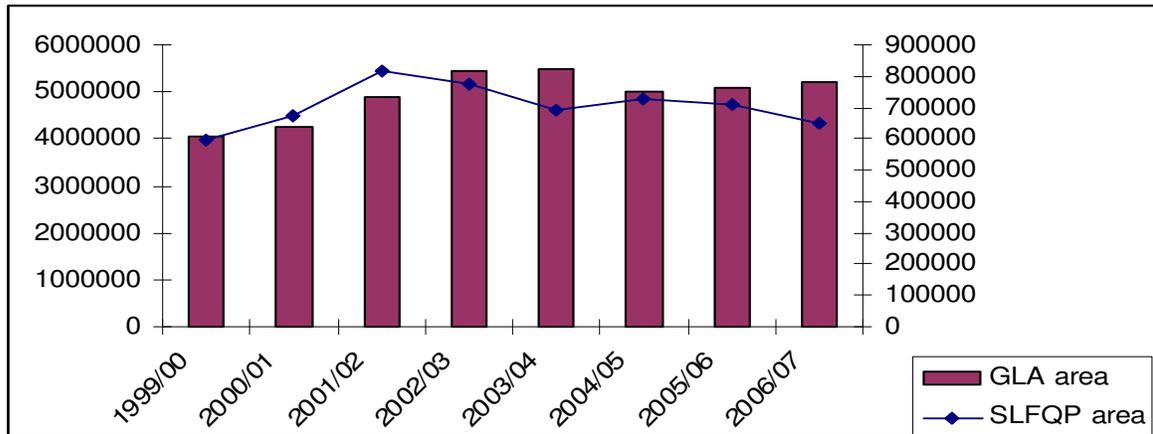
⁸ The figures obtained from London Councils do not separate the kind of PCNs (no spreadsheet per code).

⁹ The borough of Westminster is in the Central London FQP area.

¹⁰ This data do not include the following Boroughs: London Corporation, Ealing, Lambeth and Sutton.

¹¹ London Councils, 2007. .

Figure 3.2: Number of PCNs issued in the Greater London and in the South London FQP area



Data: London Councils, 2007

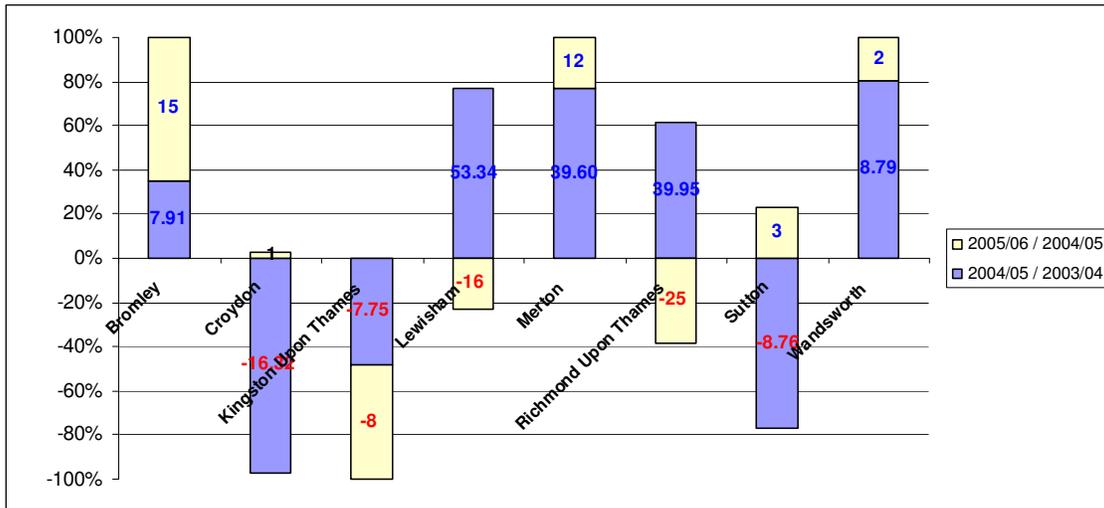
Between 1999 and 2007, the number of PCNs issued increased in both areas with increases of +27% in the Greater London Area and +9.1% in the South London FQP area respectively. During this period, there was a peak in the Greater London Area during 2003/4, and in 2001/2 for the SLFQP Area.

Since the peak in the South London FQP Area, there has been a slight decrease in the number of PCNs issued, whilst in the Greater London Area, the number of PCNs issued appears to be stabilising.

The London-wide increase is mainly explained by the fact that TfL data regarding PCNs issued on Red Routes were only made available from 2002/03. Since then, the number of PCNs issued on the Red Routes has been increasing +89% between 2002/03 and 2006/07, while the number of PCNs issued was reduced by 4.6% in the Greater London area and by 16% in the South London FQP.

Figure 3.3 shows the trends in the numbers of PCNs issued for the individual boroughs between 2003 and 2006. If it was previously observed that PCNs issued in the Greater London were stabilising, and in the South London FQP area were decreasing, the fact still remains that there are clear differences among the Boroughs, with no homogeneity. Indeed some of them (e.g. Bromley) have seen a significant increase of the number of PCNs issued between 2003 and 2006, whilst there are others which see a significant decrease of the number of PCNs issued, such as Croydon. Each case being different it is not possible to explain the trend. A more-in-depth analysis including a consultation with local authorities would be needed to give an explanation to those observations.

Figure 3.3: Evolution of the number of PCNs issued in the South London FQP area¹²



Data: London Councils, 2007

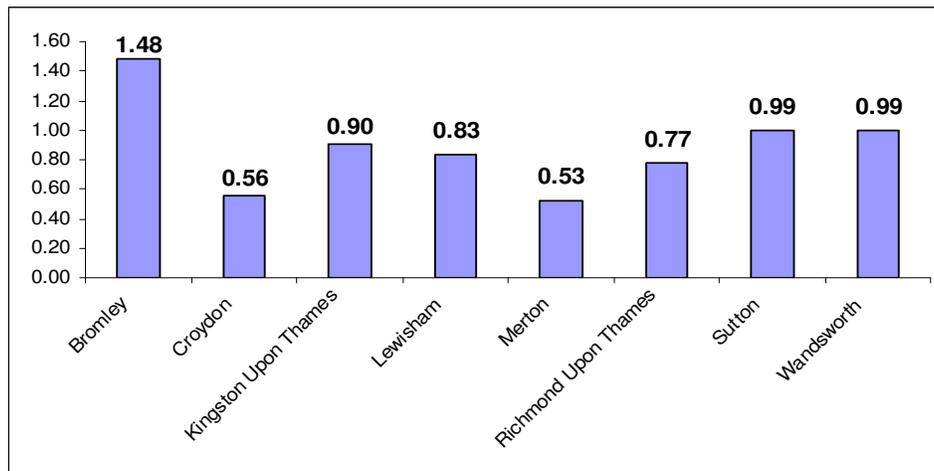
3.2 Penalty Charge Notices Appealed

The Parking and Traffic Appeals Service (PATAS) was established by The Road Traffic Act 1991 to provide administrative support to the Parking Adjudicators. The Parking Adjudicators consider appeals against Penalty Charge Notices issued by the London Boroughs.

The number of PCNs appealed is generally quite low (less than 1% of the total of the PCNs issued) and the reasons for appealing vary from one Borough to another. According to retailers consulted within this study, this low rate could be the consequence of the fact that for people who are issued with a PCN, there is the opinion that to appeal would not be worthwhile because they feel that the council are not sympathetic to their needs even quoting “Usual outcome - Appeal is rejected”. However, even if the number of PCNs appealed is low, the fact still remains that on average, half of them are reconsidered by the local authority.

¹² London Councils, 2007.

Figure 3.4: PCNs appealed in the South of London FQP area (%)¹³



Data: London Councils, 2007

3.2.1 PCNs appealed: results of consultation

The consultation with stakeholders from the private sector showed that businesses have a bad feeling regarding PCNs issued in the South London FQP area and think that they reduce the quality of work of their delivery staff. Some of them mentioned a difference of treatment between PCNs issued for a breach of the parking restrictions and those issued for loading and unloading operations.

According to the **business sector**¹⁴, the typical outcome for contested tickets is for the appeal to be denied. However, they are more successful contesting the 'Code 25'¹⁵ because they think it is easier to show that the parking attendant made a mistake with details.

Some **retailers** mentioned that they challenged every PCN issued, but soon found that the 'Code 02'¹⁶ and Red routes are never cancelled.

According to **freight operators** consulted, some of them blame the local authority, because when they appealed to the adjudicator, they asked for proof that the original penalty notice had been served legally and correctly but the '*Council fail to produce such evidence and most then get cancelled*'.

According to some South London FQP Boroughs, 'Code 25' can be contested successfully if the Civil Enforcement Officer makes a mistake with details.

Furthermore, during the stakeholder consultation made in the summer 2007, a medicine provider contested the reasons why they often receive PCNs. Most of the times they cannot make deliveries early morning or late afternoon as their clients (i.e.

¹³ Data from London Councils, 2007.

¹⁴ This includes retailers and freight operators.

¹⁵ Code 25: 'On street – Parked in a loading place during restricted hours without loading'. See the table in the Appendix.

¹⁶ Code 2: 'On street – Parked or loading/unloading in a restricted street where waiting and loading/unloading restrictions are in force'. See the table X.X. in the Appendix.

chemists) are not open and most do not have a delivery point except through their front door. The vans have to park on the road and have to be parked as close as possible to their delivery point as they carry controlled drugs.

In addition, some PCNs are appealed if the Adjudicators receive details regarding the loading/unloading operation, and if such actions are permitted in accordance with the parking regulations and restrictions at the location of the alleged contravention. These details include documented proofs to corroborate the circumstances related to the issuing of the PCN, such as an invoice, timed delivery docket/note or similar, and the information tallies with the date/time of the PCN. Information will also be requested should proof not be supplied within the first communication received. Failure to supply appropriate information will result in the continuation of recovery action. The outcome will depend on the evidence people who have received a PCN provide and the evidence gathered by the parking attendant.

4 PENALTY CHARGE NOTICE DATA CAPTURE IN THE SOUTH LONDON FQP AREA

The systems used by local authorities to issue PCN differ greatly from one local authority to another and also within Boroughs (this research has identified 4 or 5 different software support companies being used between all the Boroughs). In fact, the choice of system depends in part upon whether the Council arranges its own parking attendant data capture or if it is outsourced to the private sector. Private sector arrangements also differ greatly.

All of the data were provided by stakeholders during the consultation¹⁷. The information in the following sections was provided by local authorities.

4.1 London Borough of Croydon

Croydon's enforcement capability could allow suitable contravention codes to apply to both *Waiting Restrictions* and to *Loading Restrictions*. Apparently, there is potential to use CCTV footage for instances of loading / unloading and for parking attendants to take digital images of all vehicles that are ticketed. At the end of 2007 the Borough was finalizing contractual arrangements regarding enforcement in the Borough. Due to that reason, the Council did not want to communicate a lot about this issue.

Figure 4.1: Croydon High Street



TTR, 2007

4.1.1 PCN data capture system in Croydon

In terms of locating hotspots, the Borough of Croydon suggested that it would be necessary to build a flag into the machines that prompts the parking attendant to confirm the type of vehicle a ticket is issued for when a vehicle is illegally occupying a delivery bay. This would identify whether the vehicle was a delivery vehicle that has been booked for no evidence of loading/unloading or a car illegally parked in a delivery bay.

¹⁷ See the list of people consulted in the Appendix.

The Council also insisted on the fact they needed for an agreed format for collecting the data across all Boroughs; indeed some Boroughs do the work in-house, others are outsourced. That is one of the reasons why the Borough is concerned about the management and the need for an agreed format for collecting the data across all Boroughs. Technically, they use an in-house RTA system at the moment, but this was on the way out due to the fact that operations were in the process of being outsourced. The new system that will be used is called Glowtech. There was also a need from the Council for a central repository for all data in a uniform format. They raised the idea that perhaps TfL should create a template of how they would like the data collected.

4.2 London Borough of Kingston

In the London Borough of Kingston, the Penalty Charge Notice issued to the motorist records:

- Notice Number
- Date of Notice
- Vehicle Registration Mark (VRM)
- Location of Contravention (road name only)
- Date of Contravention
- Times contravention observed between or at (if no observation period required)
- Vehicle Make
- Vehicle colour
- Issuing parking attendant's identity number
- Contravention Code and description
- Amount of penalty charge and availability of discount.

The total number of parking Penalty Charge Notices issued by the Borough in 2006-07 was 61,073.

4.2.1 PCN data capture system in Kingston

Throughout the Borough, 21 officers are responsible for parking enforcement and there is no CCTV enforcement. At the end of 2007 the Borough used the *Civica Systems Ltd 'Authority Traffic'* for PCN issuing and processing software system. They mentioned that they were using the Politess 600i hardware for PCN issue but will be upgrading to the x600 unit at the start of 2008.

The Borough of Kingston only captures information relating to the name of the road that a vehicle is recorded on (not by location geocode), the make of vehicle and standard parking offence code. Indeed, if a delivery truck is captured, it is not possible to distinguish whether the offending vehicle is indeed a truck or a car. With respect to the parking attendants in charge of enforcement, Kingston Council thinks that it would be very difficult – or impossible - to train staff to recognise vehicles of different sizes.

In addition, some Borough officers think that TfL would need to discuss the requirements with the software suppliers and would need to be clear about the proportion of funding that would be available to the Boroughs to see through this

software change to the data capture machines. They consider the job to be massive due to the different system suppliers across all 33 London Boroughs feeding information into one database, presumably managed by TfL.

4.3 London Borough of Lewisham

Figure 4.3: Lewisham High Street



The information contained within a PCN is statutory for all London Boroughs and is contained with the Road Traffic Act 1991 (Section 3.1). Parking enforcement in Lewisham is carried out fairly and equitably in accordance with the Road Traffic Act 1991.

There is no observation period within the study area. Traffic attendants record vehicle number plates at the time of observation and return 30 minutes later. If the vehicle is in the same space, a PCN can be issued but must be applied to the vehicle and photographed for the PCN to become valid. Parked vehicles along single yellow lines during restricted hours are observed for 10 minutes, if delivery staff cannot be seen, the PCN will be issued at 11 minutes, cars get 5 minutes observation. This is not constant observation and the permitted delivery times are expected to be common knowledge because they are not signposted.

The main area issued for loading/unloading is Deptford High Street. However, the parking provision is being investigated in this area as part of a wider SRB regeneration scheme.

4.4 London Borough of Merton¹⁸

In Merton, 31 parking attendants patrol all around the Borough area. There is no time limit restriction for the loading and unloading operations, but they officially have a 10 minute observation period before issuing a PCN.

Regarding the idea to distinguish the type of vehicles for the PCN issuing, Merton did not see how it could be possible to distinguish a commercial vehicle from a non-commercial one.

¹⁸ Information obtained from a face-to-face interview with the parking enforcement managers.

4.4.1 PCN data capture system in Merton

On the PCN is written information is recorded about the reasons why the PCN has been issued (using the Contravention Code), the detailed location of where the PCN was issued (street number), the notice number, the date of notice, the VRM, the date of contravention, the issuing parking attendant's identity number... However, neither the weight, nor the type of vehicle appears on the PCN. According to Merton, it is 'illegal' to insert the category of trucks in a PCN as it is not indicated in the Road Traffic Act 1991.

Moreover, it is very difficult for them to identify 'real' hotspots and they do not consider this identification as relevant as they follow the idea that '*there are local restrictions and drivers have to respect them*' (quoted a Borough officer)¹⁹.

During the consultation, Merton insisted on the fact that the Council was not concerned by this change in the loading restrictions (such as the 40 minute rules, etc.). Furthermore, the Borough does not consider time as a restriction for the loading and unloading operations. They do not see the benefit of having a 40 minute rule whilst sometimes it takes more than one hour for an artic to deliver goods²⁰.

4.5 London Borough of Richmond

In Richmond, the Penalty Charge Notices issued to the motorist record the following:

- Time
- Registration Number
- The reasons why a PCN was issued
- Colour of the vehicle
- Where the vehicle was seen
- Parking attendant
- Contravention
- The full penalty charge
- Reduced Penalty
- Penalty Charge Notice Number
- Penalty Charge Notice Date
- Vehicle Registration Number
- Date of Contravention.

¹⁹ Despite this fact, information was given about potential hotspot location. See in section 5.5.

²⁰ The idea to change all local time restrictions to load and unload on the yellow lines (from 20 minutes to 40 minutes) has been proposed by London Councils in March 2007.

4.5.1 PCN data capture system in Richmond

Table 4.1: Enforcement in the London Borough of Richmond upon Thames²¹
Data – April 2007 – September 2007 (inclusive)

Enforcement	Number of PCNs issued in the whole Borough
Observation (1) (issued by a parking attendant)	37,467 (78.3%)
CCTV (CCTV bus lane only)	4,587 (9.6%)
Other recorded equipment (CCTV mobile car)	1,903 (4%)
Other (2) (CCTV Static camera)	3,887 (8.1%)
Total PCNs issued	47,844

(1) Observation periods carried out within the Borough relate to the type of contravention that is being observed. Richmond Council has adopted guidance from London Councils and acts also in the interests of customer care.

(2) Richmond Council at present only use one CCTV static enforcement camera, which is positioned in St Margaret's Road.

Regarding CCTV and PCNs, all of their notices conformed to the directives set by present legislation; however all are pending reviews, particularly regarding the future introduction of the TMA 2004 in 2008.

The Council uses CCTV cameras to enforce loading bays. Thanks to this system, on one of the major used loading bays in Richmond, the average number of PCNs issued is 700 per year, which reflects the effectiveness of the CCTV system in capturing offenders, but also highlights that the system does not act as an efficient deterrent. Shopkeepers seem to be happy with the system put in place by the local authority to improve the quality of loading/unloading operations.

Regarding the idea to introduce the type of vehicles in the PCN format, the Borough recognised that it would be difficult to ascertain if the vehicles are commercial or non-commercial, especially if there isn't any technical information available on the outside of the vehicle, such as weight. This would also make it more difficult to differentiate between the types of vehicles receiving a penalty charge. As a result, the Borough proposed that information was standardised and located in one place on vehicles. If this was introduced, it would result in Parking Attendants spending more time on the carriageway and accordingly, local authorities would need to consider potential H&S issues for Attendants.

Regarding the appeal for PCNs issued, the London Borough of Richmond expresses that if the Penalty Charge Notice is not paid before the end of a determined period, a notice ("*Notice to Owner*") may be served by the Council on the person appearing to

²¹ Data from the Council, 2006.

them to be the owner of the vehicle. The *Notice to Owner* will allow appeals on the following grounds:

- That the recipient was not the owner at the time
- That the charge exceeds the appropriate amount
- That the vehicle was being used without the owner's consent
- That there was no contravention
- That the vehicle was on hire
- That the traffic order was invalid.

On the PCN, no postcode is mentioned and no GPRS positioning is used, only a non-standardised written description of the location where the offence occurred. This is not specific enough to pinpoint where hotspots take place along a particular street or within an area.

One of the main worries raised by some parking attendants in enforcing the PCNs regards defining the 'loading/unloading activities'. As well as this, even if parking attendants make observations, the fact still remains that without a camera; only the work of the parking attendant is applicable as evidence. In addition, they have problems in clearly identifying the weight of a truck.

They are currently discussing the option of developing a Wi-fi / GSM system which is, according to them, more reliable. However, on the topic of upgrading the PCN capture system and TfL involvement, the Borough did not see the reason for TfL having an influence in the way they choose to upgrade their PCN data capture; they think that as TfL has no power over yellow lines, they shouldn't be involved in such an upgrade of their PCN systems.

4.6 London Borough of Sutton

The consultation with the local authorities showed that PCNs were not the main issue to tackle in the Borough, and were not one of the public policy priority tasks. In fact, the number of PCNs issued all around the Borough is quite small – in comparison with the other London Boroughs (Figure 3.1)

In Sutton, the Penalty Charge Notices issued to the motorist records the following information:

- Record the Vehicle Registration Mark (VRM)
- Make and colour
- Excise license number
- Road name
- Time and date
- Parking Attendant number contravention code with description
- Amount due and PCN number.

4.6.1 PCN data capture system in Sutton

The software/hardware provider that they use is *Langdale Systems Ltd* and the manufacturer of the parking attendants hand held computers is DAP.

Sutton is able to capture vehicle information based on the make and colour. The current set up of PCN data capture would only capture the fact that it is a commercial vehicle.

Table 4.2: Enforcement in the London Borough of Sutton²²
Data – September 2006 – September 2007 (inclusive)

Enforcement	Number of PCNs issued in the whole Borough
Parking attendant observation	42,684
CCTV	none
Other recording equipment (Smart car mounted camera)	143 (notices)

The Council mentioned that it would be possible to gain information based on “*Waiting Restriction*” infringements but not for “*Loading Restriction*” infringements. In addition, regarding the idea to add a category about the type of vehicle inside the PCN format, the Borough mentioned that it would be impractical to expect parking attendants to be able to accurately capture the exact size of vehicle, unless it was classified as over or under 3.5 tonnes. However, the Council think that this could easily be added to the enforcement system at Sutton by making a small adjustment via their software company.

4.7 London Borough of Wandsworth

In Wandsworth, observation periods exist for a parking attendant to observe any evidence of loading/unloading taking place in an area where parking is restricted, but loading/unloading is permitted. The length of the observation period depends largely on the type of contravention and often on the vehicle type.

There are 94 parking enforcement officers within the Borough and due to the size of the Borough, it is not easy to enforce parking restrictions all of the time.

Figure 4.2: Northcote Road, Wandsworth



²² Data from the Council, 2006.

4.7.1 PCN data capture system in Wandsworth

Wandsworth Council typically expects parking attendants to provide a minimum 2 minute observation period before issuing any tickets to any vehicle that is parked incorrectly in a bay or along a yellow line that does not have a loading/unloading restriction enforced at the time. The Council would expect parking attendants to provide 5 minute's observation to commercial vehicles before issuing tickets. Parking attendants usually observe vehicles for longer periods and do not issue tickets to vehicles where it is clear that loading / unloading is taking place.

Parking enforcement in the Borough is contracted out to Central Parking System (which trades under the name of Control Plus) and provide basic training to all parking attendants. Following initial training by Control Plus, further training is then provided by the Parking Enforcement department at Wandsworth Borough Council to include details about specific policies.

4.8 PCN issuing systems

Table 4.3 was compiled in order to summarise the different attributes used by the London Boroughs when they issue PCNs. The PCN attributes column on the left was provided by TfL Freight Unit. It was observed that generally the Boroughs followed the indicators written in the RTA 1991 but not one Borough reached all of the targets provided by TfL.

**Table 4.3: Overview of information contained in PCN by South London
Boroughs**

PCN Attributes	Bromley	Croydon	Kingston	Lewisham	Merton	Richmond	Sutton	Wandsworth
PCN Number	✓	✓	✓	✓	✓	✓	✓	✓
Date PCN issued	✓	✓	✓	✓	✓	✓	✓	✓
Time PCN issued		✓	✓			✓	✓	
Street	✓	✓	✓	✓	✓	✓	✓	✓
VRN	✓	✓	✓	✓	✓	✓	✓	✓
Geocode Map Reference								
Contravention Code	✓	✓		✓	✓	✓	✓	✓
Vehicle Attributes								
Vehicle Make			✓					
Vehicle Colour			✓			✓	✓	✓
Foreign Registered Vehicle								
Country Of Origin								
<i>Livery Details</i>								
<i>Vehicle Type</i>								
Location Details								
Line Details								
Box Details								
Casual or Constant Observation								
Observation period from								
Observation period to								
Loading or Unloading Seen?								
Loading or Unloading Details								
Vehicle parked by/Outside								
Additional records from the Boroughs								
Issuing Parking attendants's identity number			✓			✓	✓	✓
Amount of penalty charge and availability of discount	✓		✓	✓	✓	✓	✓	✓
Address to which payment of the penalty charge must be sent	✓			✓	✓			✓

Table 4.3 shows the type of systems used by South London FQP Borough members (commercial names):

TABLE 4.3: PCN DATA CAPTURE SYSTEMS²³

<u>Borough</u>	<u>System Used</u>
Bromley	Civica
Croydon	Spur
Kingston	Civica
Lewisham	Unknown
Merton	Compex
Richmond	Compex
Sutton	IBS
Wandsworth	Civica

PCN systems	Characteristics
Compex	<p>Compex is developing terminals that include Bluetooth/Wifi connectivity, barcode scanners and touch screens, integrated digital camera with Automatic Number Plate Recognition (ANPR) capability.</p> <p>Further enhancements such as geographic user tracking and remote download are available on handheld devices with GPS and GPRS capabilities. These handhelds can be used in conjunction with a portable printer for mobile ticket issue. Imperial Civil Enforcement Solutions can supply handheld computers and printer units from all leading manufacturers, including Casio, Psion, DAP and Symbol, complete with handheld computer software and communications software for full integration.</p>
Ibsopensystems	No information
Spursolutions	<p>Si-Dem is a notice processing software and parking management package designed to support Road Traffic Act enforcement and a broader range of penalty notice initiatives.</p> <p>Si-Dem is designed around a Windows environment, ensuring that local authorities are compliant with the electronic-Government Interoperability Framework (e-GIF) that lies at the heart of the nation's overall e-government strategy.</p> <p>Two million active PCNs and 80 operators simultaneously access the system.</p>
Civica Plc	<p>Installed in both large and small authorities including half of London's Boroughs, Civica's systems provide the facilities necessary to administer all aspects of enforcement for parking and wider street management activity. Integrated capabilities for on-street and office staff include notice issue and processing, permit automated solutions for digital imaging and electronic payments.</p>

²³ Data collected from companies' websites.

5 PENALTY CHARGE NOTICES HOTSPOTS IN THE SOUTH LONDON FQP AREA

5.1 Bromley, Market Square

23 traffic assistants are dedicated to on-street enforcement in the Borough, but only six in the centre of Bromley who concentrate on certain hot spots. Therefore, in order to enforce the area, since November 2005, the Borough uses CCTV to enforce the area and issues PCNs.

The camera crackdown in Market Square went 'live' after the Council's parking team had issued three weeks of warning tickets to motorists flouting the rules. In this period, 300 warning notices were issued. Parking attendants also warned drivers about impending camera enforcement policy. The study made on this area within the framework of the Legal Loading Initiative²⁴ showed that the majority of PCNs issued on Bromley Market Square are linked to loading and unloading operations.

A majority of PCNs are issued to vehicles that are parked without loading or unloading. In this area, it is becoming increasingly difficult for delivery drivers to use the loading bay because most of the time it is occupied illegally by other vehicles (mainly cars) and as a result, more than 50% of the PCNs issued on the site are not due loading and unloading activities.

There are very few appeals due to CCTV evidence. People predominantly use the bays in order to use cash machines, purchase refreshments or another activity that takes only a few minutes. However, given that this is very common, the bay can be occupied the whole day by people parked there illegally.

5.2 Croydon, High Street

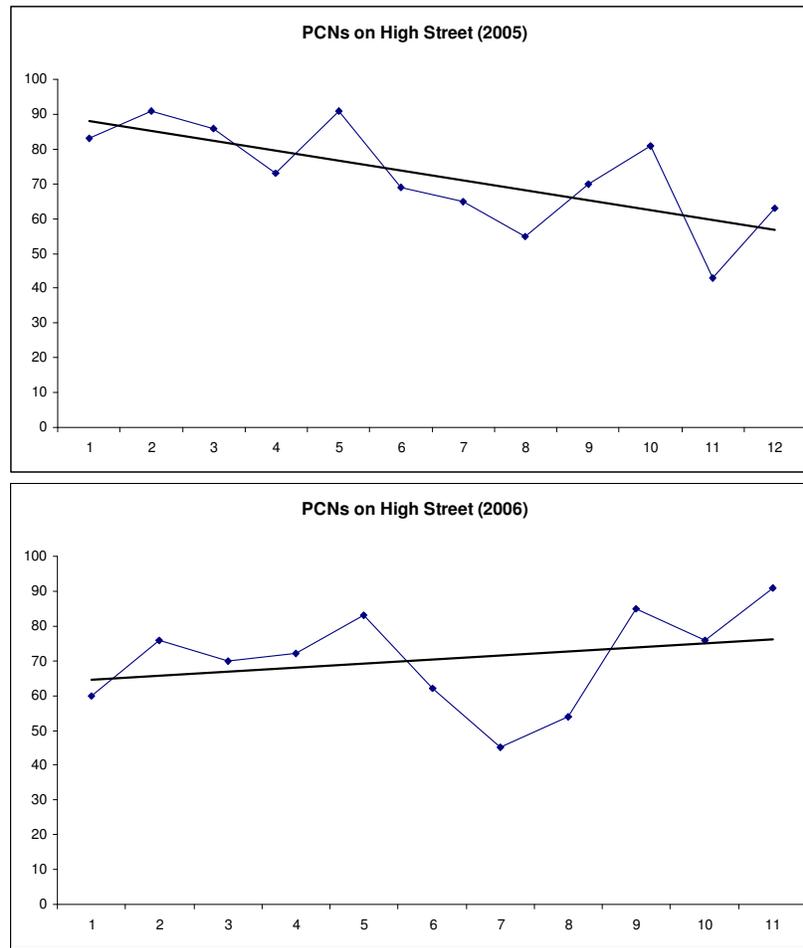
The system used in Croydon allows for the identification of the exact location where PCNs were issued. According to Croydon Council, the High Street is one of the main PCN hotspots throughout the Borough.

From April 2006 to November 2006, 304 PCNs were issued on the High Street (between Number 42 to the Flyover), between January 2005 and December 2006, 1677 PCNs were issued on the whole of the High Street. Unfortunately, it is not possible to know the exact reason why PCNs were issued, i.e. if it is for loading and unloading reasons, or not.

The majority of PCNs are issued outside Millets on the **single yellow line (80%)**. No information has been disclosed as to the reasons for issuing these PCNs. However, it may be due to not respecting the time restrictions. Only one PCN has been issued for parking in the ambulance bay.

²⁴ Bromley Market Square study, TTR on behalf of the South London FQP, 2007.

Figure 5.1: Number of PCNs issued (2006-2005)



The decrease in the number of PCNs issued on the High Street during 2005 was due to a shortage of parking attendants; numbers were low for some time. Levels increased in 2006 due to the introduction of mobile enforcement units.

Table 5.1: Sample of the recorded PCNs on this area

No of PCNs		Location
1	HIGH STREET,CROYDON+	BF BY FURNITURELP012
1	HIGH STREET,CROYDON+	BF BY FURNITUREPD009
3	HIGH STREET,CROYDON+	BF BY FURNITUREPD010
4	HIGH STREET,CROYDON+	BS BY STREETMASONS AVE
2	HIGH STREET,CROYDON+	BS BY STREETSCARBROOK ROAD
11	HIGH STREET,CROYDON+	BS BY STREETTSURREY ST
1	HIGH STREET,CROYDON+	BY AMERICAN EXPRESS
1	HIGH STREET,CROYDON+	O/S 76
1	HIGH STREET,CROYDON+	OP OPPOSITE102-104
1	HIGH STREET,CROYDON+	OP OPPOSITE106
1	HIGH STREET,CROYDON+	OP OPPOSITE108
1	HIGH STREET,CROYDON+	OP OPPOSITE108A
1	HIGH STREET,CROYDON+	OP OPPOSITE71
2	HIGH STREET,CROYDON+	OP OPPOSITE96
1	HIGH STREET,CROYDON+	OP OPPOSITEBEER CIRCUS
4	HIGH STREET,CROYDON+	OP OPPOSITEGALICIA
1	HIGH STREET,CROYDON+	OP OPPOSITEGEORGE ST
30	HIGH STREET,CROYDON+	OP OPPOSITE LEON HOUSE

5.3 Kingston

Market Place

When it was questioned, the Royal Borough of Kingston confirmed that Market Place was one of the main PCN hotspot areas regarding the loading and unloading activities. Indeed the PCNs issued for loading and unloading account for nearly 50% (47.4%)²⁵ of the total issued (code numbers 02 and 03). It highlights three important points:

- Whenever they can, delivery staff do use the loading bays.
- Generally car drivers prefer to park in a loading bay rather than a bay reserved for a disabled person.
- Loading bays are often considered like a good place to park for a short period of time and people perceive that this is not well enforced.

In addition to the Market Place, the Borough also proposed other areas where there were problems with PCNs regarding the loading and unloading activities. However it was not possible to gain information about the exact location where PCNs were issued:

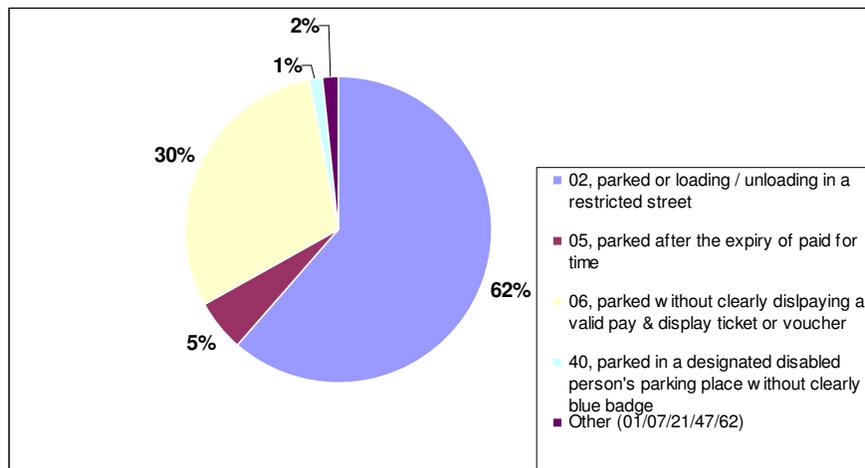
- **The Broadway, Tolworth**
 - ✓ Reasons: 60% on loading restrictions, 35% on P&D parking bays
 - ✓ Number of PCNs issued: 1,368 (Apr.06/Mar.07)
- **Portsmouth Road, Kingston**
 - ✓ Reasons: Over 90% in resident permit parking bays
 - ✓ Number of PCN issued: 1,352 (Apr.06/Mar.2007)
- **Fife Road, Kingston**
 - ✓ Reasons: 33% in P&D bays, 20% on waiting restrictions, 7.5% on loading restrictions, 17% in designated loading bays, 10% in disabled bays.
 - ✓ Number of PCNs issued: 1,344 (Apr.06/Mar.2007).

When they were questioned within the framework of the consultation, businesses proposed other PCN hotspots areas in the Borough regarding loading and unloading activities.

All PCNs were issued by parking attendants on their beat. None were issued via camera or other means.

²⁵ Data from the Council, 2007.

Figure 5.2: PCNs issued in Tolworth Broadway



5.4 Lewisham, Deptford High Street

According to the London Borough of Lewisham, Deptford High Street is one of the main hotspot areas throughout the Borough. The main contravention code used in this area is '26e'.

According to the **businesses** questioned, the main problems regarding PCNs issued for loading/unloading activities are located on the following area:

- **St Johns Hill SW11** (main contravention code, 02).

5.5 Merton, Wimbledon Village

The Council is unable to separate the type of vehicle committing contraventions so cannot advise as to hot spots for delivery vehicle parking. However, one of the main areas for parking contraventions is **Wimbledon Village High Street** but nearly all of the vehicles are private going into the shops/coffee shop.

5.6 Richmond Margaret Road, Twickenham

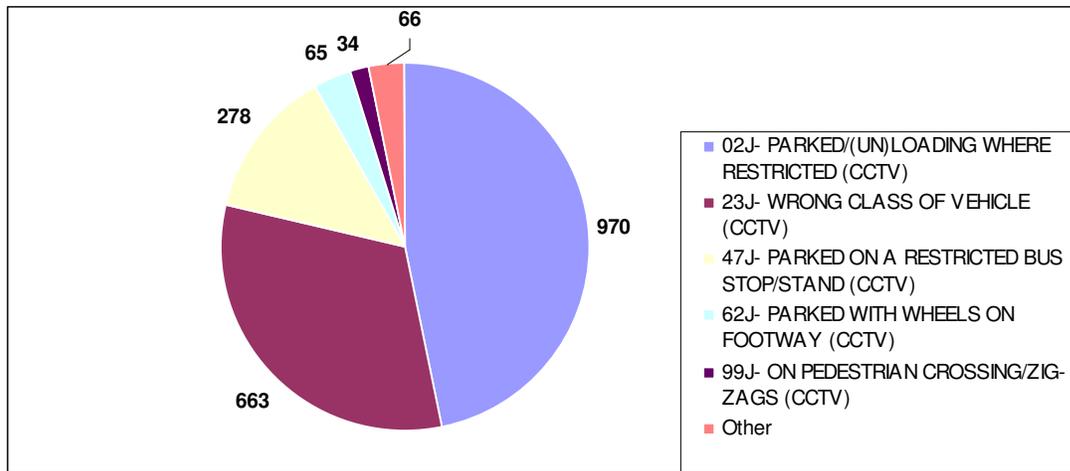
The London Borough of Richmond identified some PCNs hotspots in its area which are spread here below. However it was not possible to gain information about the exact location where PCNs were issued:

- **St Margaret Road, Twickenham** (contravention code 02)
 - ✓ Reasons: Loading/unloading, deliveries, drop offs, boarding/alighting - both private and commercial.
 - ✓ Total of PCNs issued (for 3 months): 2,076.
- **The Green, Richmond** (contravention code, 23)
 - ✓ Reasons: Late to return to vehicle due to extenuating circumstances
- **Sheen Road, Richmond** (contravention code, 05)
 - ✓ Reasons: Dispensations not correctly displayed or failed to displayed
- **Heath Road, Twickenham** (contravention code, 05)

- ✓ Reasons: Unaware of restrictions

On St Margaret Road, the number of PCNs issued is spread as the following one:

Figure 5.2: PCNs issued in St. Margaret Road, Twickenham



The information in figure 5.2 is for the period Apr – Sept 2007, which is more beneficial to the study as various enforcement operations only commenced in 2007, i.e. CCTV static camera and CCTV mobile car.

5.7 Sutton, Beddington Gardens

The London Borough of Sutton identified some PCNs hotspots in its area which are spread as below. However it was not possible to gain information about the exact location where PCNs were issued:

- **Brighton Road – Sutton** (contravention code: 01)
 - ✓ Number of PCNs issued: 952 (mostly for parking on a waiting restriction)
- **Thornton Road – Sutton** (main contravention code: 62)
 - ✓ Number of PCNs issued: 805 (mainly footway parking)
- **Beddington Gardens – Wallington** (main contravention code: 02)
 - ✓ Number of PCN issued: 744 (mainly parked on a loading restriction).

As parking attendants only record the make and colour of each vehicle the Council is unable to advise on whether the vehicles are commercial or private.

Unfortunately the only code for which the Borough records whether a vehicle is commercial or private is code 01 (as a commercial vehicle is given more observation time), and in Beddington Gardens, only 12 PCNs, and 4 in Thornton Road, have been issued to commercial vehicles in the '01 restriction'. In Beddington Gardens and Thornton Road, there are loading restrictions and footway parking restrictions respectively, but as a result, the Borough is not able to say how many of the other PCNs were issued to commercial vehicles.

5.8 Wandsworth

The London Borough of Wandsworth identified some PCNs hotspots in its area which are spread as below. However it was not possible to gain information about the exact location where PCNs were issued:

- **Northcote Road** (main contravention codes: 01, 05, 40, 47, 99)
 - ✓ Number of PCNs issued: 2,295 (May06-Nov.06)
- **Queestown Road, SW8 Battersea** (main contravention code: 47)
- **Werter Road, SW15 Putney** (main contravention code: no)
- **Preston Road, SW11 (Wandsworth)** (main contravention code: 45)

Northcote Road, Wandsworth

Northcote Road was one of the six sites identified within the Legal loading Initiative project conducted during the Summer 2007.

On this road, drivers are usually allowed to stop to load or unload. Commercial vehicles are allowed to collect and deliver goods.

Nearly 40% of all PCNs issued on Northcote Road were due to the vehicle being parked during prohibited hours. A further 25% were issued because the vehicle was parked beyond the time for which it had paid for. In the case of delivery vehicles, the latter contravention would not apply because tickets would not be purchased for delivery vehicles loading / unloading.

During the six month period from May 2006 to November 2006, there were a total of 2,297 PCNs issued for parking-related offences on Northcote Road. Whilst it was not possible to break this number down into the types of vehicles that received PCNs, it was possible for the data to be broken down by type of contravention.

Approximately 10% of all PCNs issued throughout the London Borough of Wandsworth were appealed.

6 CONCLUSIONS AND RECOMMENDATIONS

6.1 Conclusions

- The consultation phase of the study was a very good opportunity for Boroughs to express their point of view regarding parking management. All stakeholders were consulted and individual forums were organised with 5 of them.

The Road Traffic Act 1991 gives instructions to local authorities to issue PCNs. Some of them go further in the information contained in tickets they issue but the extra information can't be challenged either by a prosecutor or by drivers fined. Incidentally it is not possible to identify the real number of PCNs issued on commercial vehicles as no realistic indication is collected on vans to know if they are commercial ones or not.

- In 2006, nearly 15% of the total of PCNs issued in the Greater London was issued in the South London FQP area. This relatively low percentage directly impacts on the fact that the Boroughs generally do not consider problems to park as a great problem for them. They often compared their situation to what happens in Westminster where the number of PCNs issued is very high in comparison with their area. Wandsworth is the Borough most affected by PCNs issued.

- Between 2002/03 and 2006/07 the number of PCNs issued in the South London FQP area decreased by -16% and by -4.6% in the Greater London area. The number of PCNs appealed is quite low and generally the code the most challenged is the Code 25²⁶. As a result, legal solutions should be found to change the codes and give to them more details.

- Regarding how to improve PCN data capture, some Boroughs were interested in technically upgrading their systems and think that a harmonization of the PCN format would be a very useful thing to follow on.

When looking at the detail of the responses given during this consultation, this last clearly highlighted that 2 kinds of Borough appear:

- Boroughs that really want to improve technique they use to capture data and who insist on the fact that technology can help them to reduce the number of infringements. By technology, they mean more CCTV enforcement with new (quicker) technology and GPRS in order to analyse where and why problems regarding PCN happen in a specific area. Those Boroughs are interested in being involved in an upgrade of their PCN systems in the coming years.
 - Boroughs who think that this is not their current priority and who prefer to stay with their current technique as they do not consider the introduction of new data in their PCN systems as something useful right now.
- The London Borough of Croydon agreed to upgrade its PCN issue and management software in 2007/8 and the Boroughs of Wandsworth, Sutton and

²⁶ Code 25 indicates that a loading place is used during restricted hours without loading

Richmond-upon-Thames claimed to be interested in upgrading their PCN data capture, possibly in 2008/9. They could be negotiated in the next financial year.

6.2 Recommendations

- There is a need to train parking attendants and delivery staff so they understand each other and their respective difficulties when they work. Indeed the consultation showed that business complained of being not listened or understood in their activity and in parallel Boroughs admitted that it was sometimes difficult for parking attendants to distinguish loading / unloading and parking operations.

As a result we propose that trainers are offered within the framework of the co-operation in London between TfL, the subregional FQPs and the Boroughs in order to manage 'courses' with attendants from the 8 Boroughs and with local businesses. Those trainers would respect the guidance contained within the London Loading & Unloading Code of Practice.

There is a real need to develop a closer working relationship between Parking services, Planning and Environment services within the Boroughs.

- Upgrading some PCN data system integrating information presented in the table 4.3 and provided by TfL. These systems should include as one of the principle part:
 - the vehicle category,
 - if the PCN is freight related
 - GPRS.

In addition we think that it would be interesting to build a flag into the machines that prompts the parking attendant to confirm that when the ticket is issued for a vehicle occupying a loading bay, it is confirmed that the vehicle was really a delivery vehicle.

- Develop an agreed PCN format for collecting the data across the London Boroughs. This idea should be developed at a London-wide view by TfL or London Councils.
- Before updating the restrictions, it is essential to understand the logistics patterns of the operators and discuss with them the requirements of the residents and the needs of other public space.
- It would be interesting to back up the hotspots revealed in this research and to see if there is a positive feedback of using those new systems or other delivery options to reduce the number of infractions.

APPENDIX

Main contravention codes used to issue PCNs linked with loading and unloading activities

Code	Description
01	On street- Parked in a restricted street during prescribed hours
02	On street- Parked or loading/unloading in a restricted street where waiting and loading/unloading restrictions are in force.
05	On street- Parked after the expiry of paid for time
20	On street- Parked in a loading gap marked by a yellow line
23	On street- Parked in a parking place or area not designated for that class of vehicle
25	On street- Parked in a loading place during restricted hours without loading
26	On street- Vehicle parked more than 50cm (or other specified distance) from the edge of the carriageway and not within a designated parking place
40	On street- Parked in a designated disabled person's parking place without clearly displaying a valid disabled person's badge.
45	On street- Parked on a taxi rank
47	On street- Stopped on a restricted bus stop/stand
62	On street- Parked with one or more wheels on any part of an urban road other than a carriageway (footway parking)
70	Off street- Parked in a loading area during restricted hours without reasonable excuse
99	On street- (London only) Stopped on a pedestrian crossing and/or crossing area marked by zigzags

List of the people consulted

Organisation	Position
LB of Bromley	Head of Traffic Engineering
	Interim Parking Services Manager
LB of Croydon	Senior Engineer
LB of Kingston-upon-Thames	Parking Services Manager
LB of Lewisham	Parking & Road Safety Manager
	Transport Planner
LB of Merton	Direct line Manager
LB of Richmond-upon-Thames	Principal Engineer
	Transport & Policy Programme – Section Manager
	Performance Manager
LB of Sutton	Contract Monitoring Officer
LB of Wandsworth	Senior Transport Planner
	Contract & Operations manager – Parking enforcement
Wilson James	Project Manager
Musgrave	Transport Manager
Unichem	Branch Secretary
Sainsbury's	Environment Manager