



Bristol Cycling Campaign
c/o Roll for the Soul
Unit 2 St. Lawrence House
Quay Street
Bristol BS1 2JL
email: secretary@bristolcyclingcampaign.org.uk
mobile: 07884 265 071
website: www.bristolcyclingcampaign.org.uk

February 14 2014

Consultation Co-ordinator
Department for Transport
Zone 1/29 Great Minster House
London SW1P 4DR

**Response to DfT (2013) *Consultation on local authority parking*, HMG London by
Bristol Cycling Campaign**

[The Bristol Cycling Campaign](#) is a membership organisation with 400 members established in 1992. Members take part in a range of activities including social rides, practical workshops and the annual Bristol Cycling Festival. We are affiliated to the [CTC](#), the national cycling charity.

Specialised committees of The Bristol Cycling Campaign focus on aspects of campaigning, promotion and traffic infrastructure and there are a number of links with Bristol City Council through a City-wide Cycling Forum and formal and informal consultation over specific matters of interest to cycling and the promotion of more cycling in the City. Bristol Cycling Campaign played a significant part in supporting the City's funded activity during the Cycling City project between 2008 and 2011 and has made significant contributions to work on the Cycling City Ambition grant, and to recent safety improvements.

Discussion of policies and principles have taken place in membership meetings, in specialised committees and in an open internet forum to which all members can contribute. Discussions with members of the public have taken place over recent months while the Freedom To Ride Manifesto has been promoted at locations around the city.

In the last year the Bristol Cycling Campaign has gathered 3,900 signatures for a City-wide campaign to urge the adoption of a ten point [Freedom To Ride Manifesto](#) by the Mayor and Bristol City Council. The Mayor has indicated support in principle and Bristol City Council are being urged to debate the Manifesto in full session as a result of the numbers who have signed the petition.

Bristol Cycling Campaign has also set out a [Strategy](#) by which the aims of the Manifesto can be realised. The Manifesto and the Strategy make it clear that the promotion of more cycling would be to the benefit of all in reducing congestion, increasing public health and reducing levels of harmful pollution along Bristol's busiest routes.

In the [Strategy](#) document Bristol Cycling Campaign, under the heading "Integration" we say:

"Excessive and inappropriate motor vehicle use must be made less convenient, and fairly priced, e.g. through congestion charging and parking management schemes. Integration with public transport must be made as easy as possible. Development control policies must provide for high levels of cycling, and rigorously applied. A danger reduction strategy to make our roads free from fear and harm must be followed. Transport planning models must ensure cycling is properly valued. Enforcement measures must protect the vulnerable. Integrated signing, mapping and online tools must make the city easy to navigate by bike. All measures should also support walking."

We believe that this paragraph is significant in the context of national guidance on car parking. We would suggest that any general move towards a more permissive environment for short-stay car-parking on or close to busy streets is, on balance, a move in the wrong direction. Walking, cycling and bus journeys are all impeded by short-stay parking on the road, whether that parking is permitted or simply tolerated by virtue of less active enforcement. To that extent any advantages gained by vehicle users and the business premises they are visiting are at the expense of less dangerous, healthier and more sustainable modes of transport. They also create barriers to broader policy objectives on well-being, innovation and growth in local economies. In the wider scheme of things, the immediate convenience of easier parking is likely to result in lower standards of health and prosperity for many of those who have enjoyed the temporary convenience. A short-term expedient will have inhibited long-term improvement.

Under the specific headings of the consultation paper we have added some detailed comments based on our experience of cycling and of encouraging cycling in Bristol over the last two decades. In doing so we take it as read that an increase in cycling (and walking) and a reduction in motoring will help to reduce problems currently experienced by all and will yield benefits to those users of motor vehicles whose journeys remain essential and valuable to the whole community. We think that the ideal balance of transport modes would have less cars than at present, with more walking, more cycling, and more use of public transport. This ambition is also held by the current Mayor of Bristol. It is also reflected in the high proportion of journeys to work made on foot or by cycling in Bristol (17%) as well as the proportion of Bristolians who cycle in Bristol once a month (18%). Both of these figures are rising. Anything that reduces the cost of using a motor vehicle (such as easier car parking on city streets) will be to the longer-term detriment of everyone, including those parking, and to the immediate disadvantage of those trying to travel by other means.

We would also want to refer to current research that, at least, questions the commonly expressed view that easier car parking on roads that are lined with shops contributes to the viability of the shops or other businesses. We appreciate that, when asked, some traders do assert the commercial necessity of easy access to parking near their premises but we also note that the research that has been done does not support and, in some cases, contradicts such a link. The DfT itself would be in a good position to fund high quality research on the question and should do so before encouraging a relaxation of the current low levels of enforcement activity.

A [submission from the Cycling Embassy of Great Britain](#) has set out some of the exploratory research that has already been done. We would also point to preliminary work done in Bristol by Sustrans in 2006 and reported in the widely cited "Shoppers And How They Travel" that suggests cycling and walking can contribute significantly to shopping streets like Gloucester Road in Bristol. More recent

Response to DfT (2013) *Consultation on local authority parking*, HMG London by Bristol Cycling Campaign
experience in the city shows that as additional cycle parking is added to shopping streets the cycle racks very quickly become full. With those broader observations in mind our answers to the specific questions published in the Consultation on local authority parking document are as follows:

Q1. Do you consider local authority parking enforcement is being applied fairly and reasonably in your area?

To the extent that the enforcement of parking restrictions is considered to be unaffordable we believe that cyclists and pedestrians are put at an unfair disadvantage relative to those using cars wherever enforcement is neglected. Mandatory and advisory cycle lanes are frequently blocked by parked vehicles while junctions and crossings are often concealed by illegally or carelessly parked vehicles. Parking and loading on pavements are becoming commonplace. Decisions that reduce the enforcement of parking regulations lead to an assumption of permission and normality which creates a hostile environment for pedestrians and cyclists using or crossing local streets.

Our view is that within the budget limits that have been imposed by central government Bristol City Council acts reasonably but the outcome is still unfair to the most vulnerable groups of road users and inimical to wider attempts to reduce congestion and its consequences.

Q2. The Government intends to abolish the use of CCTV cameras for parking enforcement. Do you have any views or comments on this proposal?

CCTV cameras are an essential part of Bristol's traffic management. Without them key bus routes at peak times and traffic control during bridge closures would not work. Bristol roads are already over-capacity and restricted by geographical factors and by heritage buildings. The ongoing introduction of city-wide 20 mph speed limits indicates a political will to control and reduce private motor vehicle traffic in the interests of all citizens, including pedestrians and cyclists. We believe that CCTV cameras will continue to be one important tool in the reduction of speed and in the control of rogue parking in bus and cycle lanes. Even brief transgressions can cause considerable hazards for cyclists and pedestrians. Data on road traffic collisions in Bristol bear this out. Roads with lots of shops and busy commuter traffic (such as Gloucester Road, Whiteladies Road and Fishponds Road in particular) are roads where many cycling casualties occur.

Q3. Do you think the traffic adjudicators should have wider powers to allow appeals?

We are not aware of any improper use of CCTV cameras in the city of Bristol. We can see no reason to increase the powers of adjudicators to intervene when essential regulations that already exist are not fully enforced.

Q4. Do you agree that guidance should be updated to make clear in what circumstances adjudicators may award costs? If so, what should those circumstances be?

We do not agree.

Q5. Do you think motorists who lose an appeal at a parking tribunal should be offered a 25% discount for prompt payment?

This seems like a practical question about the net cost of collection. The option of a discount following unsuccessful appeal would encourage more appeals than are currently made and increase costs accordingly. Bristol Cycling Campaign has no view on the question.

Q6. Do you think local residents and firms should be able to require councils to review yellow lines, parking provision, charges etc in their area? If so, what should the reviews cover and what should be the threshold for triggering a review?

Bristol already has a pattern of Neighbourhood Forums and Partnerships where traffic matters can be discussed and reviewed. At present Resident Parking Schemes are being implemented, with neighbourhood level review periods built into the process. Businesses and residents are given opportunities to raise issues and elected Councillors make decisions within their areas based on judgements made at such meetings.

This pattern offers plenty of opportunity for special interest groups or individuals to make representations but it is clear that people and resources can be spread very thinly when issues like traffic (which affect a whole city) are being discussed and agreed at a micro-level.

Q7. Do you think that authorities should be required by regulation to allow a grace period at the end of paid for parking?

No. Adding ten or fifteen minutes to a published period simply shifts the dispute about "only a minute over" to another moment in time and will encourage longer periods of waiting that will still generate conflict once the grace period has expired.

Q8. Do you think that a grace period should be offered more widely – for example a grace period for overstaying in free parking bays, at the start of pay and display parking and paid for parking bays, and in areas where there are parking restrictions (such as loading restrictions, or single yellow lines)?

No. The same simple argument applies. Clarity, transparency and certainty are valuable qualities in any system of regulation. Discretion and special pleading might already occur within a regime that has no grace periods. It seems unlikely that this pragmatic reality would disappear at a new time with grace period added. If longer periods are thought to be useful and non-detrimental local authorities can make the permitted period longer under current arrangements.

Q9. If allowed, how long do you think the grace period should be?

Not applicable

Q10. Do you think the Government should be considering any further measures to tackle genuinely anti-social parking or driving? If so, what?

Funding for more enforcement officers to keep parking to that which is currently allowed will help those looking for legitimate parking spaces and those whose travel is impeded by illegitimate parking. Cyclists, pedestrians and bus passengers are groups whose numbers are increasing in Bristol and they should not find their more sustainable choices reduced in value by inconsiderate parking that makes their journeys more hazardous or more congested. It is likely that a sustainable future will demand the more severe kinds of restriction already imposed in much of central London.

In summary, the broad thrust of the present Consultation document seems to be an acceleration of negative trends that will make improvements to the urban environment even more difficult to achieve.

Document ends

This Word Document was sent as an email attachment to consultation@dft.gsi.gov.uk February 14 2014