

BRITISH PARKING ASSOCIATION

DRIVING ISSUES, RAISING STANDARDS



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Mr Pedro Pinto
Civil Aviation Authority,
Aviation House,
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West Sussex,
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Emailed to: economicregulation@caa.co.uk

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Dear Mr Pinto

Surface Access to Airports

The British Parking Association (BPA) welcomes your inquiry regarding surface access to Airports. As the largest professional parking association in Europe we represent around 700 organisations by promoting and influencing the best interests of these members and the parking and traffic management sector throughout the UK and Europe. These organisations are many and varied and include manufacturers, car park operators, local authorities, health authorities, universities and higher education facilities, airports, railway stations, shopping centres, theme parks, construction companies, learning providers and consultants. We have 144 members managing parking on private land and 250 local authorities amongst our members.

For more information about the BPA please see the endnote.

The BPA wants to make certain that parking management is undertaken fairly, reasonably and responsibly. A number of BPA members are involved in delivering services to Airports; including car park operators, parking management companies, contractors, security firms and enforcement agencies, access control and equipment manufacturers and suppliers etc. Therefore, we have a keen interest in the various parking activities at and associated with Airports and address these below in our response.

The Safer Parking Scheme

The BPA manages the Safer Parking Scheme and its registered trade mark Park Mark on behalf of the Association of Chief Police Officers CPI. The scheme is for public and private operators' car parks and aims at reducing crime and the fear of crime in parking facilities. Safer parking status, Park Mark, is awarded to parking facilities that have met the requirements of a risk assessment conducted by the Police. These requirements mean the parking operator has put in place measures that help to deter criminal activity and anti-social behaviour, thereby doing everything they can to prevent crime and reduce the fear of crime in their parking facility.

In the UK, a quarter of car parks have achieved the Park Mark Award. That's around 5,000 of an estimated 17,000 - 20,000 car parks across the country where people regularly park their vehicles. The Safer Parking Scheme is particularly important at airports. Apart from leaving the car at home, airport car parks are one of the few places where cars are left for long periods of time and as a result, security and safety are highly valued by motorists. Currently 194 car parks at airports across the UK have the Park Mark accreditation.

Research by Looking4Parking found that 94% of their customers said the Park Mark award was important to them. It is perhaps no surprise then to find there is a Park Mark car park somewhere at every airport in the UK, large or small. Hotels and Meet & Greet operators have also found that having Park Mark accreditation enhances customer satisfaction and peace of mind.

Research focusing on car parks in the Safer Parking Scheme (*Key Issues for Drivers*), and *Re-Think! Parking on the High Street* by the Association of Town & City Management, British Parking Association, Parking Data & Research International, Springboard Research Ltd, both seen [here](#), shows safety to be consumers' main priority, behind convenience, when choosing somewhere to park.

The distinctive Park Mark signage helps drivers find car parks where they can confidently leave their vehicle, knowing the environment is safer for them, their passengers and vehicle.

The success of Park Mark has also come at a price: the logo gets hijacked by comparison price websites and other parking operators to entice a trusting public, particularly online. Unfortunately this compromises the Park Mark brand and to encourage motorists to check we continually promote the Park Mark award and explain that the Park Mark website: www.parkmark.co.uk is the only website that can guarantee that the car park has a genuine Park Mark award. The CAA and airports in general can assist in this regard by promoting Park Mark on websites and in terminal buildings and reporting any misuse of the logo.

Park Mark is a registered trademark ®. Both the tick type and the words Park Mark may only be used under license. Therefore, we take it very seriously when the logo is used incorrectly and take action to prevent its misuse; this includes asking the company to remove it, informing Trading Standards and the Competition and Markets Authority.

Meet and Greet operators

The BPA is currently developing the Professionalism in Parking Accreditation or PiPA for individuals and organisations working in the parking profession. PiPA will reflect universal principles and individual sector requirements.

Initially, we have launched PiPA for the Healthcare parking sector and it is intended to drive standards higher in the hospital parking sector to encourage Health Trusts to provide an excellent service to their car park users. I enclose a PiPA [pack](#) which sets out some of the standards that we would now expect of any Trusts applying for PiPA.

I am delighted that two Trusts have already been awarded PiPA and the award presentation was made at the House of Commons launch of the scheme at which MPs were present.

We worked closely with officials at the Department for Health during the development of PiPA, and in the revision of Parking Guidance issued by the Department in March 2015 to ensure that PiPA is directly relevant to the government's expectation of Trusts in relation to car parking and more generally in relation to the guidance given by the Department for Health to Trusts.

We hope that PiPA will continue to gain traction within the Healthcare sector thus driving standards higher. Healthcare PiPA is a starting point for expanding PiPA across other car parking sectors, we are now adapting PiPA for Higher Education, and will be exploring other sectors such as Meet and Greet and Local Authorities.

The award comprises a single organisational audit, in two parts; Overarching, high-level principles applicable to all sectors (e.g. Healthcare or Meet and Greet) and innovative accreditation. The award will recognise achievement and boost reputation.

It was noted at your recent stakeholder engagement workshop that CAA has proposals to create an auditing scheme of some kind for measuring surface access to airports and the BPA would be a willing partner in this work should you wish to take up this offer. We see a significant synergy between what you are thinking about and our PiPA and we would be pleased to explore it further with you.

Technology and innovation

One of the most effective ways of making it easier for motorists to park without the stress of having to worry about how long they are parking is to embrace new technology to improve vehicular access. The increasing use in the private sector of automatic number plate recognition which enables motorists to park without paying, to stay as long as they like but to make payment either on their return or online within, say, 24 hours. This is the same principle as applies to London's congestion charging scheme and the governments' Dart-charge on the Dartford crossing.

Additionally, BPA member companies are active in developing on-line and mobile Apps to search, locate, book and pay for parking facilities and this will increasingly play a role in surface access to airports. Almost all car parking at UK Airports is provided by BPA Member companies and so are the access control and payment systems associated with them.

Communication

We would advise all drivers considering using airport parking and meet and greet services, to of course, seek out Park Mark and AOS approved operators.

We believe in better communication with the public to ensure they understand parking regulations, why car parking often has to be charged for, how to appeal against parking tickets and also how to park considerately and sensibly. It is important to encourage consistency and parity between public and private parking operations to try and minimise confusion for motorists. The BPA has produced A Guide to Parking in conjunction with the consumer association Which? In 2014 we launched our [Know Your Parking Rights](#) information service and website at the House of Commons, and attended by and endorsed by Penny Mourdant, then High Streets Minister and Transport Minister, Robert Goodwill.

The Approved Operator Scheme

Where parking on private land relies on trust and /or payment of fees and charges, without specific access controls and the potential for enforcement, and the need to acquire keeper details from the DVLA arises, the BPA has developed an Approved Operator Scheme, (AOS) with a Code of Practice (CoP), a scheme of sanctions, (which includes expulsion) and an annual external audit of all members to ensure operators comply with the code. The CoP was developed by a Panel which, comprised of consumer representatives, including people with disabilities, motorists, consumer organisations, vehicle hire companies and freight operators as well as BPA officials and Approved Operators members. The code is designed to continually raise standards in the private parking sector and as such this can be expanded with POPLA included to provide a fair system of enforcement.

Over recent years, seven companies have been expelled for serious breaches of the code. A few airport parking companies are members of the BPA's Scheme.

In addition, the BPA has established POPLA, the Parking on Private Land Appeals serviceⁱ, which came into being at the same time as The Protection of Freedoms Act in 2012 and since its launch over 92,000 appeals have been submitted. This is the equivalent of 1% of all parking charge notices issued on private land and compares favourably with the levels of appeal to the statutory traffic penalty tribunals in London and in England and Wales. POPLA is judicially independent, with an Independent Scrutiny Board guaranteeing absolute independence.

We are concerned that neither the Department for Transport nor DVLA have performed a standard-setting role in this context and consequently we believe the Government can help motorists and landowners alike by establishing a standard setting body (SSB), accountable to Government which will regulate parking on private land.

We believe that government should establish a standard-setting body (SSB), which reports to the Department for Communities and Local Government (with whom the responsibility for off-street parking now falls). The Body must be accountable to government, be fully funded by the private parking sector and should enhance standards through a single enforceable code of practice, a single scheme of sanctions and single independent appeals service for motorists. There should also be an independent scrutiny board which oversees the appeals service.

An SSB would replace the role of the DVLA as the body accrediting operator schemes but instead would authorise DVLA to release keeper data to operators and landowners by the SSB which in turn would only give such authorisation when it believed the applicant was fully compliant with the code.

Conclusion

Appropriate parking control is vital to ensure that parking facilities remain accessible and provide value for money, both for the airports providing access, and for the drivers accessing the airports.

We would be pleased to provide any written evidence, reports, images or published materials that may be of use to you in the course of the inquiry.

In addition, I would also be delighted to offer the services of a representative to give oral evidence as part of the process

We hope you will find these comments of interest the BPA is ready to work with the government to achieve these desired aims and we look forward to discussing with you how we can assist in taking these issues forward.

Please do not hesitate to contact my colleague Kathryn Shipman by emailing consultations@britishparking.co.uk or calling 01444 447 317 if you require any information.

Yours sincerely



Patrick Troy
Chief Executive

Endnote

About the British Parking Association:

The British Parking Association (BPA) is the largest professional association in Europe, representing around 700 organisations in the parking and traffic management profession. Our members include manufacturers, learning providers, consultants, local authorities, car park operators, including those managing parking on private land such as retail parks, healthcare facilities, universities and railway stations. We have 144 members managing parking on private land and 250 local authority members. We provide our members with knowledge and a range of benefits and resources that assist them in their day to day work.

As the recognised authority within the parking profession, we represent, promote and influence the best interests of the parking and traffic management profession throughout the UK and Europe. We also manage initiatives for the sector including the Safer Parking Scheme (on behalf of the Association of Chief Police Officers), the Approved Operator Scheme (for those managing parking on private, unregulated land) and our stakeholder engagement group, the Parking Forum.

We place the consumer at the heart of our thinking and as the recognised authority in parking we actively represent and promote the sector by advancing knowledge, raising standards and professionalism, and using our influence to deliver excellence for the benefit of all.

For more information regarding us here at the BPA, please click [here](#).

ⁱ The processes of POPLA

The motorist has 28 days to appeal to POPLA from an operator's rejection of their representations. This is for POPLA to decide and will then feed back to the BPA to investigate any breaches identified. POPLA operates as an independent resolution for non-statutory parking charges. POPLA is independent of all parties to appeals, including the operator and the BPA.

Once the appeal is lodged, the operator has 28 days to submit evidence they allege proves the breach. POPLA is free to the motorist.