



---

**To: Scrutiny Co-ordination Committee**

**Date: 11 April 2024**

**Subject: Parking Enforcement and Road Safety**

---

## **1 Purpose of report**

- 1.1 The purpose of this Briefing Note is to raise awareness of the Council's Civil Parking Enforcement function and to inform Scrutiny Co-ordination Committee of current activities and arrangements relating to parking enforcement by providing an overview of key priorities and performance.

## **2 Recommendations**

- 2.1 Members of the Scrutiny Co-ordination Committee are recommended to:
  - a) Note the actions and initiatives in place to tackle the key parking enforcement priorities.
  - b) Make recommendations as appropriate to the Cabinet Member (Policing and Equalities) and the Cabinet Member (City Services).

## **3 Background and information**

- 3.1 The Council has been responsible for parking enforcement in Coventry since April 2005 when the function was decriminalised and transferred from the West Midlands Police. As a result, the Police have very little day to day involvement with the activity and nowadays their powers are limited to the enforcement of dangerous and obstructive parking in areas that fall outside of the Council's remit, (e.g. where there are no parking restrictions, white zigzags near pedestrian crossings, moving traffic offences).
- 3.2 Since March 2008, Civil Parking Enforcement has operated under Part 6 of the Traffic Management Act 2004. Amongst other things, the legislation requires the Council to ensure its parking policies are effective, appropriate, consistent, fair, and transparent.
- 3.3 The legislation also states that any financial surpluses that are generated from Civil Parking Enforcement are 'ring fenced' and can only be used to fund the service, highway improvements or traffic safety schemes.
- 3.4 Parking Enforcement should not therefore, be used as a means for raising revenue for the Council.

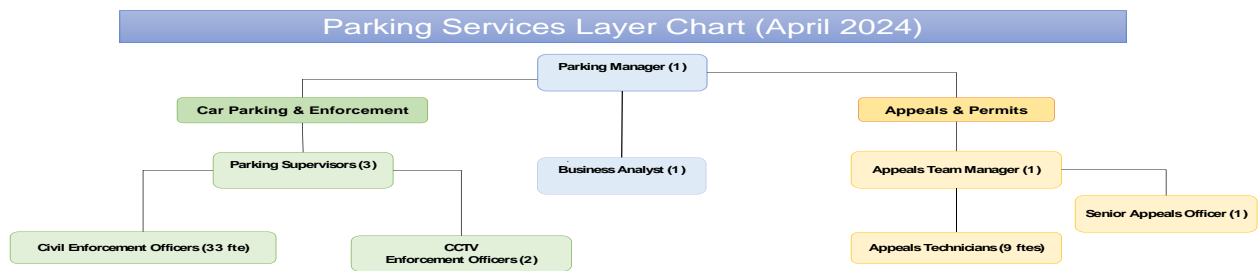
- 3.5 Parking can be an issue for local communities, and members of the public often express concerns about inconsiderate parking, verge and footway parking, obstructive and dangerous parking. It is important therefore, that the approach to parking management is informed by an understanding of the enforcement regime which together with traffic management, provide benefits to road users, including pedestrians, cyclists, motorists in general.
- 3.6 Parking enforcement is integral to the Council's wider transport strategies and the main aims are to:
- Improve road safety
  - Improve access for public transport, public service vehicles and emergency services vehicle
  - Act as a deterrent to inconsiderate and dangerous parking
  - Improve traffic flows
  - Reduce traffic congestion which in turn will improve air quality
- 3.7 The Council's Parking Service undertakes the following functions and activities:
- Civil parking enforcement
  - Bus lane and enforcement
  - Moving traffic enforcement
  - Parking appeals service
  - Resident parking scheme management
  - Car park management
- 3.8 Historically, car park management was undertaken by CV One, the former City Centre Management company. The function was amalgamated into Parking Services in November 2012 when CV One was disbanded. This helped to remove duplication of effort and to deliver significant cost and efficiency savings. As a result, the management of the Council's private and public car parks, and civil parking enforcement duties are undertaken by the in-house Parking Services.
- 3.9 In May 2022, legislation was updated to allow local authorities outside London the power to adopt moving traffic enforcement (e.g. banned left / right and U turns, driving in no entry zones, stopping in yellow box junctions etc.) which historically were enforceable by the Police only. Coventry was granted the powers to carry out MTE during July 2023.

#### **4 Civil Parking Enforcement**

- 4.1 Civil Parking enforcement is not always popular and is a contentious and emotive subject. However, it is vital to improve road safety and traffic flows, whilst reducing congestion and improving access for essential public and emergency services vehicles together with public transport.
- 4.2 The parking enforcement function is carried out 364 days a year with Christmas Day the only day when the service is closed.
- 4.3 **Staff Resources**
- 4.4 Coventry's Parking Services are delivered by an in-house team comprising 51 posts as follows:

- Parking Manager [1]
- Parking Supervisors [3]
- Civil Enforcement Officers [33]
- Business Analyst [1]
- Parking Appeals Manager [1]
- Appeals Technicians [10]
- CCTV Enforcement Officers [2]

Please see the organisation chart below:



Total 51 fte

#### 4.5 Civil Enforcement Officers (CEOs)

- 4.6 The CEOs are the public face of parking enforcement and the way that the staff perform their duties is crucial to its success and the public's perception. The officers provide a highly visible, uniformed presence and act as the first port of call to the public.
- 4.7 CEOs need to be professional and efficient, and often deal with difficult and challenging circumstances. Regrettably, CEOs are regularly on the receiving end of verbal and physical assaults from members of the public and this is a nationwide problem in the industry.
- 4.8 It is well known that violence and aggression towards CEOs is on the increase, and this presents a further challenge to the successful recruitment of employees into the role. Suffice to say, it requires a special type of character to be a CEO.
- 4.9 Nowadays, CEOs wear body cameras to help reduce the number of assaults or to capture video evidence to assist with prosecutions when it does happen.
- 4.10 The overarching aim of the CEO is to ensure that parking regulations are observed and enforced in a professional, fair, accurate and consistent manner. Their main duties and responsibilities are:
- To monitor vehicle parking in relation to the restrictions.
  - Encourage considerate parking and discourage inconsiderate parking behaviour.
  - Educate the public to improve parking habits.
  - Minimise illegal parking through enforcement measures where required.
  - Inspecting and repairing parking equipment.

#### **4.11 Operational Arrangements**

- 4.12 The 33 Civil Enforcement Officers (CEOs), formerly known as Traffic Wardens, are organised into three teams of eleven under the day-to-day line management of the three Parking Supervisors.
- 4.13 The CEOs work a rotating shift pattern during Monday to Sunday between 07:30am to 19:15pm.
- 4.14 There are currently 4 vacant CEO posts within the service. Staff recruitment, coupled with high levels of sickness absence, are two of the main operational challenges that the service faces.
- 4.15 Due to staff shortages and demands on the operation, the permanent enforcement staff is supplemented by a cohort of up to eight temporary Civil Enforcement Officers provided by an external contractor (NSL Ltd) who provide cover between 2pm until 10pm.
- 4.16 The parking team enforce on and off-street restrictions where there is traffic regulation order (TRO). A TRO is a legal document that sets out how the Council (or other enforcement authority) will control and regulate the use of the road, including parking arrangements.
- 4.17 Suffice to say that CEOs can only issue PCNs where there is a contravention of a TRO and they do not enforce in line with the Highway Code.
- 4.18 Here are examples of TROs that are enforceable by CEOs are:
- on street restrictions (e.g. single or double yellow / red lines)
  - on and off-street parking places
  - bus lanes / gates
  - resident parking schemes
  - taxi ranks
  - disabled parking bays
  - limited waiting parking places
  - school keep-clears
  - dropped crossing and tactile crossings

#### **4.19 CEO Deployment**

- 4.20 The city centre is where most traffic congestion occurs and naturally, it requires a greater level of resource than other areas of the city, to enforce effectively. The city centre, including the Council operated car parks, are patrolled by CEOs throughout the day. The officers are also responsible for ensuring that parking equipment is fully operational to minimise downtime and loss of revenue.
- 4.21 Elsewhere, staff deployment arrangements are informed by different factors including:
- Traffic regulation orders
  - Enforcement and road safety data
  - Historic trends and parking patterns
  - Complaints / intel / Elected Member priorities
  - Parking demands
  - School drop-off / pick up times

- Events and sports fixtures
- Reactive response

#### **4.22 Observation Periods and grace periods**

4.23 In most situations the CEO will allow an observation period (normally 5minutes) to elapse between first observing the vehicle and the issue of the PCN. This is to satisfy the officer that loading or unloading is not taking place, where this is permitted.

4.24 With certain contraventions, however, (e.g. stopping on the red route, yellow zigzags outside schools, parking where there is a loading / unloading ban), the observation time is not appropriate and parking tickets can be issued instantly.

4.25 Observation periods are good practice and are not mandatory. Therefore, the Council reserves the right to reduce or remove the observation time to address local parking problems. An example would be where drivers persistently contravene parking restrictions to access a cashpoint, or where short-term waiting on double yellow lines near to schools presents a safety hazard to children.

4.26 Grace periods are fundamentally different to observation periods. A grace period of 10minutes was introduced by Government 10 years ago to prevent drivers from receiving parking tickets for being just a few minutes late back to their vehicle. This applies to time limited parking bays and is a statutory requirement.

#### **4.27 Automatic Number Plate Recognition (ANPR) camera enforcement**

4.28 Legislation allows the Council to enforce a limited number of parking restrictions using CCTV cameras where enforcement using traditional methods is difficult, (e.g. outside schools, red-routes, bus stops). In these situations, penalty notices are issued by post to the vehicle owner.

4.29 During the past few years, Parking Services has operated an enforcement car fitted with an ANPR camera, to assist with the enforcement of yellow zigzag 'School Keep Clear' restrictions outside of schools. The vehicle is clearly liveried to indicate that its intended use for enforcement purposes.

4.30 There are about 115 schools in Coventry, and many have more than one entrance to the school site. As such, there are about two hundred school access restrictions that need to be enforced at the same times of day during the school terms. Inevitably, this means that enforcement resources are stretched.

4.31 The ANPR enforcement car is an efficient way of undertaking 'school keep clear' enforcement and Parking Services aim to ensure that all schools are patrolled on a rotational basis during the school term albeit that certain schools have a bigger parking problem than others and are therefore, visited more often.

4.32 The enforcement car is also used to enforce the red route along the A4600, bus stops clearways, taxi ranks, and locations where there is a loading / unloading ban.

4.33 There are plans to introduce additional static ANPR enforcement cameras across the city later in the year with the aim of enforcing parking outside schools.

4.34 Parking Services uses a static ANPR camera to enforce a section of double red lines comprising about 20metres on the red route in Far Gosford St.

4.35 Furthermore, Parking Services undertakes enforcement of six bus lanes / bus gates across the city using static ANPR cameras under civil enforcement legislation. The

enforcement of these restrictions helps to improve the reliability of the bus service and bus journey times. Bus lanes can also significantly help reduce traffic congestion and air pollution.

## 5 Performance Levels

- 5.1 CEOs enforce illegal parking by issuing parking tickets, also known as Penalty Charge Notices (PCNs), to offending vehicles. The number of parking and bus lane PCNs that were issued during the past few years is shown in the table below:

Year	Penalty Charge Notices Issued		
	Parking	Bus Lane	Total
2023/2024	51,000	41,000	92,000
2022/2023	48,000	25,000	73,000
2021/2022	45,000	26,000	71,000
2020/2021 (Covid-19)	20,000	20,000	40,000
2019/2020	45,000	65,000	110,000

### 5.2 Penalty Charge Notices Levels

- 5.3 The aim of parking enforcement is to educate motorists and to dissuade them from breaking parking restrictions with the aim of achieving compliance - it is not about income generation.
- 5.4 The revenue collected through civil parking enforcement activities is 'ring-fenced' in line with legislation and is used to fund the service (e.g. staff salaries, equipment, uniforms, computer systems, professional fees etc.).
- 5.5 Penalty charge levels are set in line with legislation / regulations, and Coventry City Council has adopted the highest charge levels possible which are £70 and £50. These charges are reduced by 50% to £35 or £25 if the penalty charge is paid within 14 days. The charge will increase in line with process if it remains unpaid and is not appealed.
- 5.6 Where necessary, the Council will engage bailiffs [Enforcement Agents] to collect outstanding debts, and this will attract fees that are added to the total amount owed by the motorist.
- 5.7 The cost to deliver the parking enforcement operation is circa £1.2million per year. This includes the cost of the frontline enforcement function, the back-office appeals service, and the associated systems and operational overheads.
- 5.8 About 68% of parking PCNs and 75% of bus lane PCNs are paid, with the remainder being cancelled or written off if the PCN is uncollectable.
- 5.9 On average, the Council receives circa £30 for each PCN that is issued.
- ### 5.10 Enforcement challenges
- 5.11 Parking enforcement is not always popular and can be highly emotive and contentious, but it is vital to improve access to facilities and services. The enforcement function is seen as deterrent to parking problems - but it isn't the cure.

- 5.12 Vehicle ownership has grown exponentially over the decades and the number of vehicles on the roads nowadays is unprecedented. Naturally, this will lead to traffic and enforcement challenges.
- 5.13 Climate change remains a key focus and the Parking and Transport teams contribute to the management of the situation by trying to reduce congestion and ensure the free movement of vehicles, or by developing policies to encourage more sustainable travel and introducing innovative ways of enforcing.

## **6 Enforcement challenges and the plans to deal with them:**

### **6.1 Pavement Parking**

- 6.2 Pavements are constructed and provided for pedestrian use. Vehicles that are parked on pavements can cause a hazard or an obstruction to pedestrians. Those using or pushing wheelchairs or buggies may need the full width of the pavement to get past parked cars without having to negotiate kerbs to use the road. Parking on pavements also creates a danger to blind and visually impaired people.
- 6.3 However, there isn't a city-wide ban on pavement parking in Coventry or in most towns and cities across the UK. Indeed, pavement parking is encouraged in certain narrow streets where parking of cars on either side of the road would make the street inaccessible to other vehicles, especially refuse collectors.
- 6.4 If there are waiting restrictions (e.g. yellow lines) on the highway adjacent to the pavement, a parking ticket could be issued as the restrictions applies to the road and the public footpath or verge area alongside it.
- 6.5 If there are no waiting restrictions on the highway adjacent to the pavement the matter could still be reported to the Police who may deem it an "obstruction of the public highway".

### **6.6 City Centre Restricted Parking Zone (RPZ)**

- 6.7 During 2012, the Council introduced a restricted parking zone across the city centre. At that time, all double and single yellow lines were removed. In certain streets the lines were replaced with designated parking bays. At that juncture it became illegal to park anywhere on-street in the city centre other than in clearly marked designated bays. Traffic signs are located at the start and end of the RPZ to indicate that on-street parking is controlled and that restrictions apply. Smaller repeater signs are located on-street throughout the zone.
- 6.8 Most on-street parking bays in the city centre are chargeable, and drivers must pay the relevant parking fee when parked in a designated on-street parking bay.
- 6.9 The City Centre RPZ is currently being reviewed as part of the wider City Centre Traffic Management Plan (CCTMP) and changes to the existing arrangements are likely to include a red route in the city centre which is expected to be implemented from Spring / Summer 2024. In line with other red routes elsewhere in the city, the intention is to enforce 'no-stopping' on the red route using a combination of ANPR cameras and foot-patrolling CEOs.

### **6.10 Burges and Trinity Street**

- 6.11 The 'loop' comprising Trinity Street, Ironmonger Row and Burges has historically been a parking hotspot and notoriously difficult to enforce. Consequently, the area was often heavily congested with vehicles, including buses and taxis, which were unable to navigate a way through the congestion.

6.12 During the summer 2023, a new bus gate restriction was introduced on Hales Street which limits access to the area between 10am – 6pm daily. This has had a noticeable benefit on traffic flows and the environment as there are far fewer vehicles using the street making it safer to use and improving it for pedestrians.

### 6.13 **Parking Hotspots**

6.14 Aside from the city centre and parking outside schools, there are district centres and locations across the city that attract large numbers of vehicles which present different enforcement challenges throughout the day, including:

- Walsgrave Rd (Ball Hill)
- Walsgrave Hospital
- Foleshill Rd
- Stoney Stanton Rd
- Hillfields
- Earlsdon
- Cheylesmore
- Coventry Building Society Arena
- Jubilee Crescent in Radford
- Coundon
- Resident parking schemes (about 30)

6.15 Although the impacts of parking problems are similar across the city, there is no panacea or single solution to the issues and each situation must be considered based on its specific circumstances.









### 6.16 **Moving Traffic Enforcement (MTE)**


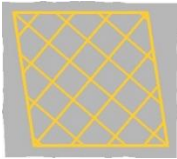
6.17 Changes to legislation came into effect in May 2022 meaning local authorities outside of London can apply to adopt powers to enforce certain moving traffic offences, which traditionally have only been enforceable by the Police. The changes to legislation grant Councils the ability to issue fines for the following traffic (not parking offences) offences:

- banned right or left turns
- blocking a yellow box junction
- travelling the wrong way in a one-way street
- no entry zones
- illegal U turns
- driving in pedestrian zones
- driving in bus and pedal cycle lanes
- one way traffic
- goods vehicles exceeding maximum weight limits

6.18 Here are examples of the restrictions and signs that are enforceable under the legislation:



Description	
No right turn for vehicular traffic	
No left turn for vehicular traffic	
No U-turns for vehicular traffic	
No entry for vehicular traffic (when the restriction or prohibition is one that may be indicated by another traffic sign subject to civil enforcement)	
Entry to and waiting in a pedestrian zone restricted	
Entry to and waiting in a pedestrian and cycle zone restricted	
Motor vehicles except solo motorcycles prohibited	
Solo motorcycles prohibited	

Description	
Goods vehicles exceeding the maximum gross weight indicated on the goods vehicle symbol prohibited	
Box junction markings	

6.19 Coventry City Council submitted a successful application to the DfT in 2023 and is now able to implement MTE measures. This will require the installation and use of static ANPR cameras at known locations to help tackle the issues which present a risk to road safety and add to traffic congestion.

## 7 Health Inequalities Impact

- 7.1 Tackling illegal parking and traffic manoeuvres through enforcement initiatives will help to reduce congestion and improve air quality by reducing pollution, whilst improving road safety.
- 7.2 A transition from petrol and diesel vehicles to low emission vehicles, and promoting active travel e.g. cycling or walking, will help to improve the air quality and generate public health benefits from increased physical activity.

### Report Author(s):

**Paul Bowman**  
 Parking Manager (Parking Services)  
 Transportation and Highways

Telephone: 024 76 972200  
 Email: [paul.bowman@coventry.gov.uk](mailto:paul.bowman@coventry.gov.uk)