

Delegated decision

November 2020

**Durham County Council response to
Department of Transport (DfT)
consultation on Pavement parking:
options for change**



Ordinary Decision

Report of Corporate Management Team

Amy Harhoff, Corporate Director of Regeneration, Economy and Growth

**Councillor Carl Marshall, Cabinet Portfolio Holder for Economic
Regeneration**

Electoral division(s) affected:

County Wide

Purpose of the Report

- 1 To seek agreement to the content of the Council's response (Appendix 2) to the Department of Transport's (DfT) consultation on 'Pavement parking: options for change'.

Executive summary

- 2 The Government is consulting on different options for restricting pavement parking nationally, due to its negative impact on mobility impaired and disabled people, as well as people with buggies or pushchairs.
- 3 In summary, there are 3 options, of which option 2 (second bullet below) is favoured by Council officers. The three options for change which are intended to limit or prohibit pavement parking are:
 - Option 1 – To rely on the improving the existing Traffic Regulation Order (TRO) process, under which local authorities can already prohibit pavement parking.

- Option 2 - A legislative change to allow local authorities with civil parking enforcement powers to enforce against 'unnecessary obstruction of the pavement'.
 - Option 3 - A legislative change to introduce a London-style pavement parking prohibition throughout England.
- 4 The Council only see a small benefit of option 1. The existing TRO process is slow and burdensome and requires public consultation. It is unlikely any changes to the process would make enough of a material difference to create a step change in how the Council manages obstructive parking.
- 5 The Council would support option 2 set out in the second bullet above. Partially de-criminalising pavement parking without requiring the Council to carry out costly and time-consuming highway audits and subsequent TROs would free up the police to concentrate on criminal investigations and allow the Council to respond to concerns from residents regarding obstructive parking.
- 6 Given the varying demands of our County, we do not believe a national blanket ban on pavement parking set out in Option 3 is the answer. The cost and time implications of the required highway audits, subsequent TRO's, signs and lines and the communications costs for exempt areas would be substantial in a county the size of Durham.
- 7 The Spatial Policy team have been working with Highways and the Equalities team on drafting a detailed response to this consultation. Our response to 44 questions is set out fully in Appendix 2 with the key issue relating to the 3 separate options summarised in the main body of this report. Once delegated approval is given, the consultation response will be submitted online to the Department of Transport's consultation portal by the 22nd November.

Recommendations

- 8 The Director of Regeneration, Economy and Growth is recommended to agree:
- a) the Council's response to the Department of Transport (DfT) consultation on 'Pavement parking: Options for change'.

Background to Consultation

- 9 The Government's 'Inclusive Transport Strategy: achieving equal access for disabled people', (July 2018) aims to create a transport system that provides equal access for disabled people by 2030. According to the Strategy, disabled people will be able to travel confidently, easily and without extra cost. The Strategy specifically contained a commitment to gather evidence on pavement parking, including evidence on the effectiveness of current laws, and potential alternatives.
- 10 In advance of this current 'Pavement parking: options for change' consultation, the Transport Select Committee, in 2019, completed an inquiry to gather evidence on the problems pavement parking causes, the effectiveness of current legislation, and the case for reform. The review included a broad range of stakeholders, including Guide Dogs; Living Streets; the Disabled Persons Transport Advisory Committee; the British Parking Association; the parking adjudicators inside and outside London (London Tribunals and The Traffic Penalty Tribunal respectively); AA and RAC; and Local Government Association, London councils and over 40 local authority parking managers.
- 11 The Transport Committee recommended that the Government consult on allowing local authorities to enforce against obstructive pavement parking, with a view to making such an offence subject to civil enforcement under the Traffic Management Act 2004. They also recommended that, in the long term, the Government legislate for a nationwide prohibition on pavement parking across England, outside London, enforceable by local authorities. This is our response to that consultation.
- 12 The Government is therefore consulting on different options for restricting pavement parking nationally, due to its negative impact on mobility impaired and disabled people, as well as people with buggies or pushchairs, all of whom can be forced into the road by cars parked on the pavement. To further develop its understanding of the pavement parking problem, the DfT is now seeking the Council's views on 3 options for change.

Option 1 - Improving the Traffic Regulation Order (TRO) process, under which local authorities can already prohibit pavement parking.

Option 2 - A legislative change to allow local authorities with civil parking enforcement powers to enforce against 'unnecessary obstruction of the pavement'.

Option 3 - A legislative change to introduce a London-style pavement parking prohibition throughout England.

Summary of Council Response to Consultation

Option 1 - To rely on the improving the existing Traffic Regulation Order (TRO) process, under which local authorities can already prohibit pavement parking

- 13 Local authorities make TROs for many reasons, for example, to restrict traffic manoeuvres (one-way or banned turns) or to set speed limits. TROs can also allow local authorities the freedom to decide if and how they wish to restrict or prohibit pavement parking in their local area. However, In the last 10 years, the Council has undertaken only one TRO relating to prohibiting pavement parking. It took 45 weeks to implement.
- 14 The Council therefore see limited benefit with Option 1. The existing TRO process is slow and burdensome and requires public consultation. It is unlikely any changes to the process would make enough of a difference to create a step change in how the Council manages obstructive parking.

Option 2 - A legislative change to allow local authorities with civil parking enforcement powers to enforce against 'unnecessary obstruction of the pavement'.

- 15 Pavement parking is very common throughout County Durham and is often a necessity in some of our more rural areas. It allows the traffic to flow and is essential to allow emergency vehicles, delivery vehicles and refuse collection to occur safely on many of our residential streets.
- 16 Option 2 partially decriminalises pavement parking by passing the majority of the responsibility for enforcing pavement parking to the local authority and away from the police. It allows local authorities with Civil Parking Enforcement powers to enforce against 'unnecessary obstruction of the pavement' by allowing officers to make a judgment call on individual cases rather than preventing all pavement parking in all areas and circumstances as proposed in Option 3.
- 17 Under Option 2, pavement parking would not become an offence in all cases, so local authorities would not need to carry out costly and time-consuming audits of their road networks; nor would it be necessary to place traffic signs and bay markings to indicate where pavement parking would still be permitted. This is particularly relevant in rural areas where pavement parking is less likely to be a problem, and where placing signs to permit it would be disproportionate.
- 18 The Council do recognise the danger presented by obstructive parking on the pavement and believe that if the powers to enforce obstructive parking was passed to the local authorities, it would allow us to address the concerns of our residents and make the road and footway network safer for both pedestrians and motorists. The police would only use these obstructions powers in extreme circumstances, so giving the Council these powers would provide better customer service to residents who may have a genuine issue with obstructive pavement parking.
- 19 The definition of 'unnecessary obstruction of the pavement' then becomes the main challenge with Option 2. In response to Q8, the Council define unnecessary obstruction as 'Where there is insufficient space to allow

pedestrians to move safely past vehicles parked on the pavement and that a space of approximately 1.2 meters would usually be required to allow somebody to pass with a push chair or a wheelchair without having to go on the road. The Council would also ask for updated Statutory Guidance for local authorities on this matter, along with a national public awareness campaign.

- 20 Option 2 would have resource implications as the Council would have to react to public complaints especially on residential areas and any enforcement would be open to challenge and appeals.
- 21 Notwithstanding the implications for extra resource, Option 2 would be less resource intensive when compared to Option 3. There would be little in the way of signing and lining when compared with both the other options. It would also mean less auditing and less consultation in rural areas that don't have parking issues the vast majority of the time. In response to Q29, officers have advised that the Council would use these civil enforcement powers if we were permitted to do so.

Option 3 - A legislative change to introduce a London-style pavement parking prohibition throughout England.

- 22 Pavement parking is essential for many residents in the County where 40% of the housing stock has no access to off-street parking. A national prohibition of pavement parking would have extensive resource implications for the Council. To exclude areas in the County from the prohibition, hundreds, possibly thousands of Traffic Regulation Orders (TROs) would need to be created and consulted on in areas of the County where a prohibition would be unpopular with residents and inappropriate to maintain essential traffic flow.
- 23 The exclusion of areas from the national prohibition would require mass signing and lining to identify streets where pavement parking was permitted leading to extra street clutter in our historic areas including a negative visual impact on 93 conservation areas. In addition, the extra signage could have equality impacts as extra signing and street clutter is an issue for those with poor visibility and other disabilities. Other equalities issues are identified in our response to Q17 of the full response as set out in Appendix 2.
- 24 The prohibition of pavement parking without these exclusions would lead to the displacement of parking, with additional tarmacked land required for new car parks. It is likely that open space, previously reserved for amenity would be needed to convert to parking areas. In more urban areas, it may be difficult to identify appropriate locations for additional parking zones. A prohibition of pavement parking would also impact on general traffic flow and create access problems for emergency vehicles, refuse trucks and delivery vans.
- 25 Given the varying demands of our county, we do not believe a blanket ban on pavement parking is therefore the answer. The cost and bureaucracy of implementing and maintaining the necessary TRO's, signs and lines required

for exempt areas would be significant. It would also take years to recoup the initial capital outlay from the surplus generated by the Council's current civil parking enforcement regime. It would also be very resource intensive, taking up a large proportion of officer time.

Conclusion

- 26 For the reasons set out above, the Council support Option 2. Partially de-criminalising pavement parking would free up the police to concentrate on criminal investigations and provide the Council with a mechanism to respond to obstructive parking.
- 27 This report has provided an overview of the Department of Transport's (DfT) consultation on 'Pavement parking: options for change', and the summary of the key messages as contained within the Council's full response which is set out in detail in Appendix 2.

Next Steps

- 28 It is proposed to submit the Council's response in support of Option 2 before the consultation deadline on November 22nd, 2020.

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Appendix 1: Implications

Legal Implications

This is only a consultation at this stage. If the Government were to implement any of the Options outlined above, a change in legislation would be required.

Finance

As this is a consultation there are no financial implications at this stage. However, Option 2 would be less resource intensive when compared to Option 3. Option 3 would have significant finance implications due to the requirement for extensive highway audits, additional TRO's and new signage and lineage. There would be little in the way of signing and lining in Option 2 when compared to Option 3.

Option 1 would have significant resource implication depending on the number of TROs the Council chose to implement. The only previous TRO the Council implemented of this nature took 45 weeks to process.

Consultation

This a Department for Transport (DfT) consultation to which the council is responding. Consultation has been undertaken with Members and a copy of our response has been shared with the Transport North East Strategy Unit representing the NECA.

Equality and Diversity / Public Sector Equality Duty

Several equalities issues surrounding parking pavement relate to the protected characteristics of age, disability and pregnancy and maternity. Appendix 2 (Q17) covers issues relating to those with protected characteristics. The response to Q17 of the consultation was completed after liaising with our equalities team.

Human Rights

None.

Crime and Disorder

Partially de-criminalising pavement parking would free up the police to concentrate on criminal investigations and provide the Council with a mechanism to respond to obstructive parking.

Staffing

All of the three main options would have resources implications. Option 3 would likely be the most resource intensive of the Options, with Option 1 dependent on the number of TRO's the Council decide to implement.

The Council's favoured option, Option 2, would not require new TROs. It would have some resource implications as the Council would have to react to public complaints especially on residential areas and any enforcement would be open to challenge and appeals.

Notwithstanding the implications for extra resource, Option 2 would be less resource intensive when compared to Options 1 and 3. There would be little in the way of signing and lining when compared with the other options. It would also mean less auditing and less consultation in areas that doesn't have parking issues the vast majority of the time

In response to Q30, around 8 DCC officers would be required to learn new enforcement guidance while working with enforcement contractors who administer the Civil Enforcement. Potential income would potentially cover the cost of any additional resource.

More Council budget would be required into communications to inform the media and to facilitate consultation events.

Accommodation

None.

Risk

Most financial, resource and highway safety risk would be with Option 3. A prohibition of pavement parking would impact on general traffic flow and create access problems for emergency vehicles, refuse trucks and delivery vans.

Procurement

None at this stage.

Climate Change

None.

Appendix 2: Durham County Council Response

Pavement Parking: Options for Change – DCC response to Consultation

Annex C: full list of consultation questions -

Introductory Questions

Question 1

For contact purposes only:

- Your name – Peter Ollivere, Durham County Council
- Your email – peter.ollivere@durham.gov.uk

Question 2

Are you responding as:

- an individual?
- **on behalf of an organisation?** Durham County Council (DCC)

Questions for individuals (DCC don't answer)

Question 3

Do you think vehicles being parked on the pavement is a problem in your area?

- Yes
- No
- Don't know

Question 4

Pavement parking causes you problems because:

- you have a sight impairment
- you have a mobility impairment
- you use a buggy or pram to transport children
- another issue

Question 5

Would you leave home more often if there was no pavement parking?

- Yes
- No

Questions for all respondents

Question 6

Do you think vehicles parked on the pavement is a problem in your area?

- Yes
- No
- Don't know

Question 7

Do you prefer:

- option 1?
- **option 2?**
- option 3?
- an alternative option? (please describe it)

Option 2 - to allow local authorities with CPE powers to enforce against 'Unnecessary obstruction of the pavement'

Question 8

How would you define an 'unnecessary obstruction of the pavement'?

Where there is insufficient space to allow pedestrians to move safely past vehicles parked on the pavement. For example, a space of approximately 1.2 meters would usually be required to allow somebody to pass with a push chair or a wheelchair without having to go on the road.

Question 9

Do you think a warning notice should be given for first-time offences of causing an unnecessary obstruction by parking on the pavement?

- Yes
- **No**
- Don't know

Question 10

What do you think are the advantages and disadvantages associated with Option 2?

County Durham is a large county with a wide range of settlements and landscapes. As a result, we receive a variety of enforcement and traffic management demands, arising from our towns, old mining villages and popular tourist destinations throughout the county.

Given the above, pavement parking is very common throughout County Durham, and is sometimes a necessity in some of our more rural areas. However, we do recognise the danger presented by obstructive parking on the pavement and believe that if the powers to

enforce obstructive parking was passed to the local authorities, it would allow us to address the concerns of our residents and make the road and footway network safer for both pedestrians and motorists. We believe there should be set guidance for the civil enforcement officers to follow, including an enforceable footway width that needs to be maintained by motorists. 1.2m would provide sufficient route width for wheelchairs, pushchairs and people with mobility issues etc. We would also ask for updated Statutory Guidance for local authorities on this matter, along with a national public awareness campaign.

We feel that the local police service should still be able to retain some responsibility, to cover emergency situations and out of hours working. We feel that a shared approach between ourselves and the Police (similar to the zebra crossing offence shared penalty – PCN code 99 – already in existence) would be a good approach.

Advantages of Option 2

- The police only use these obstructions powers in extreme circumstances, so giving the Council these powers would provide better customer service to residents who may have a genuine issue with obstructive pavement parking.
- According to national research, older people and over 90% of wheelchair users are put off leaving the house because of pavement parking. This would imply that some powers need to be given to local authorities to intervene when necessary.
- It is less resource intensive when compared to options 1 and 3. There would be little in the way of signing and lining when compared with the other options.
- Local Councils could use their discretion as to when it is appropriate to take action.
- Option 2 would mean less signage clutter, less auditing and less consultation in areas that doesn't have parking issues the vast majority of the time.
- Option 2 would be the sensible approach, particularly in rural locations.

Disadvantages of Option 2

- The challenge for LAs is to have a definition of what exactly an obstruction is – we will need photographic evidence and set guidance for the civil enforcement officers to follow.
- DCC will be open to challenge and there will be many appeals.
- DCC will have to react to public complaints especially on residential areas.
- There is test cases from law for police on what obstruction is.
- The public do not understand why the Council don't enforce pavement parking.

Option 3 - England-wide pavement parking prohibition

Question 11

Do you think a national prohibition should apply:

- **on no roads (since you are against the proposal)?**
- on all public roads within the country?
- only on roads with speed limits up to 40mph (this includes roads in villages, towns and cities); or
- in an alternative way of your description? (please describe)

Question 12

Should a national prohibition apply to:

- pavements only?
- **pavements and verges?**

DCC don't believe a national prohibition should apply but if it does, it should apply to pavements and verges, for a two key reasons.

Firstly, we need safe walking routes to schools, and these often include verges.

Secondly, the Council need to maintain verges as part of ongoing maintenance. Parked cars will also damage the verges creating more maintenance issues.

Question 13

What are your views on the impact this would have on the built and historic environment?

- Cluttering of streets is particularly a problem in our historic Durham City but also in our historic towns such as Bishop Auckland and Barnard Castle which are prominent tourist destinations.
- It would be an issue in all of our 93 conservation areas, in our rural areas, much of which is an Area of Outstanding Natural Beauty (AONB).
- Extra signing and clutter is an issue for those with poor visibility and other disabilities that can already find movement challenging in our historic areas.
- Extra signing is at cross purposes with the general principals of central government's policy to de-clutter the streets.
- Clutter of the of the pavement is self-defeating as often in creates less space for pavement parking in those area that may the permit pavement parking.

Question 14

What do you think are the advantages and disadvantages of Option 3:

- for rural areas including villages?
- for suburban areas?
- for town and city centres?
- overall?

Disadvantages of option 3

Given the varying demands of our county, we do not believe a blanket ban on pavement parking is the answer. The cost of implementing the necessary TRO's, signs and lines required for exempt areas would be massive, and it would take years to recoup the initial

capital outlay from the surplus generated by the Council's current civil parking enforcement regime. It would also be very resource intensive, taking up a large proportion of officer time.

Advantages of Option 3

- The only advantage is a simple message not to park on any pavements, but this will cause chaos until the TROs are in place, as parking will be displaced inappropriately to difficult locations.
- There would be no advantages of prohibiting pavement parking in our rural areas.

Disadvantages of Option 3

- Pavement parking is essential for many residents. In County Durham, 71% people drive to work (2011 census data) so are heavily dependent on cars for economic and social reasons.
- Banning pavement parking would make access awkward for refuse vehicles/emergency vehicles in many residential areas in the County
- Banning pavement parking would have a negative impact on general traffic flow
- Option 3 would create significant resource issues for every local authority who would need to audit each street and then introduce TROs on streets that were exempt from the new prohibition.
- Option 3 would be unpopular and create a highly bureaucratic process as residents would complain if their street was earmarked for a prohibition of pavement parking. This could lead to lengthy TRO applications and a heavy workload for officers involved in responding to complaints.
- Cost would increase disproportionately on old industrial areas such as County Durham where there are many terraced houses, in our ex mining communities. As much as 40% of our housing stock is terraced. We also have many rural areas with more spaced out agricultural villages. We would therefore have to produce a substantial amount of TRO's because of our urban streets, which are often in rural settings where ex-mining and ex-agricultural villages co-exist.
- Cluttering of streets is particularly a problem in our historic Durham City but also in our historic town such as Bishop Auckland and Barnard Castle which are currently prominent tourist destinations. It would be an issue in all of our conservation areas where extra signing is at cross purposes with the central governments policy to de-clutter the streets.
- Ongoing maintenance would be a huge cost for DCC with maintaining the signage and lineage over a long period of time

Question 15

Do you believe Option 2 or Option 3 would have an impact on the environment?

Option 2

- **Yes**
- No

- Don't know

Option 3

- **Yes**
- No
- Don't know

If answering “Yes” to an option, please explain the impact you think will occur and whether it is positive or negative.

Cluttering, people will still need to park somewhere so parking will be displaced to green areas.

Question 16

For both options 2 and 3, we propose exceptions for those vehicles listed in Annex B. (The final listed exception applies to option 3 only.)

- **What, if any, other additional vehicles or services would you like to exempt and why?**

None

Questions on the equality duty

Question 17

In respect of people who share any of the following protected characteristics:

- **age**
- **disability**
- gender reassignment
- **pregnancy and maternity**
- race
- religion/belief
- sex
- sexual orientation

Please describe any negative impacts that the options in this document might have on these objectives:

- **eliminating discrimination**
- **advancing equality of opportunity**
- **fostering good relations**

Please clearly identify the specific consultation option, the protected characteristic affected, which objective is affected and the nature of any negative impact.

- A ban on pavement parking could negatively impact on older and/or disabled people as they would potentially have to park further away from home/shops etc than they would if pavement parking was an option.
- A ban on pavement parking may negatively impact on disabled people who rely on level access to transfer to a wheelchair. A change in level from highway to pavement may create difficulty/prevent a safe transfer.
- Pavement parking may be safer for some older people, disabled people and parents (predominantly women) with small children e.g. in rural areas, outside schools/nurseries etc
- Parking on the highway would require suitable dropped kerb provision for some disabled people to access the pavement.
- There may be exceptions where pavement parking is required e.g. outside school/doctors etc for a blue badge holder where parking on the road would obstruct highway.
- Blue badge holders may rely on pavement parking – although not allowed within the scheme a ban on pavement parking may have a disproportionate impact.

Final comments for all respondents

Question 18

Do you have any other comments?

Question for 19 -24 – For organisations other than Local Authorities

Questions for local authorities

Question 25

Are you representing a council?

- Yes
- No

Question 26

Has your authority introduced a TRO, or TROs, to implement pavement parking restrictions?

- Yes

- Don't know
- No

If you answered 'No', why not?

If you answered 'Yes': * How many has your authority introduced in each of the last 10 years?

1 pavement parking TRO in last 10 years *

Typically, how long does a TRO take for you to put into place (in weeks)?

The Council have only prepared one and it took 45 Weeks.

What was the average monetary cost (to the nearest £) of introducing a single TRO? (please breakdown costs eg administration, legal, advertising, traffic sign purchase / installation & road marking creation).

£5,000. A breakdown would depend on individual site characteristics and level of public involvement.

Question 27

Could you please provide where possible, for each of the 5 years 2015-2019, figures or estimates (please specify which) for your local authority:

- the number of injury claims made to your local authority
- the number of injury claims made due to pavement parking
- the number of injury claims for which compensation was paid
- the number of injury claims made due to pavement parking for which compensation was paid
- the total compensation paid for injury claims
- the total compensation paid due to pavement parking

The Council do not have a record of such claims.

Question 28

What was the:

- **total spend on pavement repairs for each of the 5 years 2015 to 2019?**

Approximately £1m per year on defect repairs.

- **the percentage of this total spend due to pavement parking: for each of the 5 years 2015 to 2019?**

It is impossible to confirm how much of the £1m is attributable directly as a consequence of pavement parking although the authority can confirm pavement parking definitely

contributes to the acceleration of the deterioration of a footpath. Especially paving stone footpaths.

Option 2

Question 29

If your council has civil enforcement powers and was permitted to enforce the offence of ‘unnecessary obstruction’, would your council elect to do this?

- Yes
- No
- Don’t know

Question 30

If you answered “Yes” or “Don’t know”, what number of staff, in your authority, would need to learn the new enforcement guidance?

8 staff in our authority would need to learn the new guidance so they can work with contractors who would administer the Civil Enforcement and Penalty Charge Notices.

Question 31

Can you foresee any additional, unfunded costs outside of the normal issuing and processing of PCNs?

- Yes
- No
- Don’t know

Question 32

What are these costs (list the individual costs and the total average expenditure based on a per annum basis)?

Significant additional officer time dealing with appeals and re-acting to complaints from residents.

Option 3

Question 33

In your authority area, estimate based on your total road network, on how much road is pavement parking necessary to ensure free-flowing traffic is maintained? Give the amount:

- in kilometres

County Durham is a large geographic area covering 223,000 hectares (862 square miles) and is bordered by the major conurbations of Tyne and Wear to the north and Tees Valley

to the south. It has a population of over 500,000 and is the 8th largest authority in England by population. Most of the county is rural in nature, with settlement patterns centred on main towns, smaller towns and larger villages. There are almost 200 other smaller settlements, many of them former colliery villages.

It is therefore impractical (without spending a significant amount of resource) to respond to this question. Because of the scale of the County, the Council would find it difficult to support option 3.

- **as a percentage of the total road length**

See above.

Question 34

What do you expect an assessment of your road network, to identify exemptions, to cost overall and how do the costs break down individually (£)?

County Durham is a large geographic area covering 223,000 hectares (862 square miles) and is bordered by the major conurbations of Tyne and Wear to the north and Tees Valley to the south. It has a population of over 500,000 and is the 8th largest authority in England by population. Most of the county is rural in nature, with settlement patterns centred on main towns, smaller towns and larger villages. There are almost 200 other smaller settlements, many of them former colliery villages.

It is therefore impractical (without spending a significant amount of resource) to respond to this question. Because of the scale of the County, the Council would find it difficult to support option 3.

Question 35

Would your authority need to provide more parking provision to implement option 3?

- **Yes**
- No
- Don't know

Please provide any relevant evidence to support this view.

Given the varying demands of our county, we do not believe a blanket ban on pavement parking is the answer. The cost of implementing the necessary TRO's, signs and lines required for exempt areas would be massive, and it would take years to recoup the initial capital outlay from the surplus generated by the Council's current civil parking enforcement regime. It would also be very resource intensive, taking up a large proportion of officer time.

The parking displacement caused by implementing Option 3 would create the need for additional tarmacked parking areas in rural areas. In more urban areas, it may be difficult to identify appropriate locations for additional parking zones.

Question 36

Please provide an estimate of the cost of implementing exemptions in your area, including:

- **staff costs**
- **traffic signing costs**
- **bay marking costs**
- **removal of traffic signing for previously implemented TROs restricting pavement parking in your area**

Impossible to an answer without a County-wide audit.

Question 37

Can you foresee any additional, unfunded costs beyond the normal costs of issuing and processing PCNs?

- **Yes**
- **No**
- **Don't know**

Additional staff time will be required to deal with more appeals, complaints and queries.

Question 38

Give an explanation and breakdown of the number of additional:

- **staff for your local authority?**
- **salary costs for your local authority?**
- **hiring costs for your local authority?**
- **training costs for your local authority?**

Q38 Impossible to an answer without a County wide audit.

Question 39

What additional staff roles do you envisage?

Additional will be required to deal with appeals, trainings, enforcement (more CEO's) and more Council to staff to process and react to complaints.

Question 40

Do you expect any other, non-staff, costs to arise from a national pavement parking prohibition?

- **Yes**
- **No**

- Don't know

More Council budget would be required into communications to inform the media and to facilitate consultation events.

Question 41

What are these costs (list the individual costs and the total average expenditure based on a per annum basis)?

Given the varying demands of our county, we do not believe a blanket ban on pavement parking is the answer. The cost of implementing the necessary TRO's, signs and lines required and the communications costs for exempt areas would be substantial. It's impossible to an answer Q41 without a County wide audit.

Question 42

What potential benefits, if any, do you think there will be for your authority from a national pavement parking prohibition (such as existing costs being reduced)? Provide any monetary benefit where possible.

The Council see now obvious advantage or benefits to this option.

Question 43

The government is looking to local authorities to introduce more cycle facilities to encourage active travel. Do you think this will cause issues for a national pavement parking prohibition?

- Yes
- No
- Don't know?

If you answered "Yes", please describe the issues.

Yes, parking will be displaced as vehicles could not park on the pavement or on adjacent cycle lanes. This could therefore constrain the allocation of new cycle ways.

Final comments

Question 44

Do you have any other comments?

For the reasons set out above, the council would support Option 2. Decriminalising pavement parking would free up the police to concentrate on criminal investigations and provide the Council with a mechanism to respond to obstructive parking and therefore customer needs.