

**Development and Planning Scrutiny Committee**

**Wednesday 5 February 2003**

# **Parking Enforcement**

**Report of the  
Parking Enforcement  
Scrutiny Panel**



## Contents

	<b>Page No</b>
<b>Recommendations</b>	<b>1</b>
1 Introduction	3
2 Derivation of Parking Policy	4
3 Agreed Scope	4
4 Methodology	5
5 Appropriateness of Staffing Levels	5
6 Appropriate Level of Deterrent	7
7 Enforcement Guidelines with Parking Attendants	8
8 Pay and Conditions of Staff	10
9 Financial Case for the Enforcement Service	12
10 Penalty Charge Notices (PCN's)	13
11 Debt Recovery Procedures	13
12 The Impact of Overnight Charges in the City Centre	14
13 Coaches Parking On-Street	14
14 Disabled Parking Enforcement	15
15 Use of CCTV in Parking Enforcement	15
16 Overnight and Emergency Cover	15
17 Alternative Methods of Enforcement	16
18 Topics not within the original scope	16
19 Public survey	17
20 Public hearing and written representations	18
21 Conclusions of the panel	21
22 Acknowledgements	22
Appendix 1 - Car Park Statistics in Canterbury	23
Appendix 2 - Percentage of PCNs appealed against	24
Appendix 3 - Names of attendees at public hearing	25
Appendix 4 - Details of written representatives received	26

## **Recommendations**

### **Appropriateness of Staffing Levels (Paragraph No 5)**

- (1) That the number of Administration staff be urgently reviewed and if necessary increased to allow for the deployment of staff and the flexibility of working practices**
- (2) That Parking Services should co-ordinate with the Parish Councils to ascertain whether patrols are required and at what times of the day.**
- (3) The pairing up of Parking Attendants should be discouraged except for training and safety reasons.**

### **Enforcement Guidance for Parking Attendants (Paragraph No 7)**

- (4) That in the guidance given to the Parking Attendants, the observation times before the issue of a PCN should be a minimum of 5 minutes to a maximum of 10 minutes for off-street and a minimum of 5 minutes to a maximum of 15 minutes for on-street.**
- (5) That a panel of Members should be set up to review all cases where an appeal is made to the National Adjudication Service.**
- (6) That the local method for appealing be reviewed and made more transparent.**

### **Pay and Conditions of Staff (Paragraph No 8)**

- (7) That in order to recruit and retain high quality staff the pay scales of Parking Attendants be reviewed to include the £600 at present paid for added responsibility, thus bringing them in line with the East Kent Standard.**
- (8) The rota system should be reviewed to allow the flexibility needed to give cover across the whole of the District.**
- (9) The quality of feedback of information from Management to the Parking Attendants needs to be addressed.**
- (10) The safe and secure storage of files needs to be urgently addressed, with the additional requirement for the provision of a fire-proof safe for the storage of permits.**
- (11) The provision of security at the windows needs to be urgently investigated.**
- (12) The provision of a dedicated telephone system with a recording facility needs to be urgently investigated.**
- (13) The pay and job descriptions of Parking Administration staff needs to be appraised.**
- (14) The previous recommendation be implemented through a new Council Job Evaluation Scheme which should (amongst other things) reflect issues of volume of work and levels of stress.**

**Debt Recovery Procedures (Paragraph No 11)**

- (15) That a review of persistent defaulters be carried out on a regular basis.

**Coaches Parking On-Street (Paragraph No 13)**

- (16) That whilst this is perceived to be not such a problem now to residents, the Joint Transportation Board be requested to keep this matter under review.

**Overnight and Emergency Cover (Paragraph 16)**

- (17) That the provision of a Stand-By rota be set up to provide for a more efficient and robust cover on Parking related matters and that appropriate payment be made.

**On-Street Visitors Vouchers (Paragraph 18)**

- (18) That a review of the Visitors Voucher system be carried out at the earliest opportunity to ensure that only the correct amount of vouchers can be issued.

- (19) That a valid proof of residency be required to be provided at all times.

**Consolidation of Accounting System (Paragraph 18)**

- (20) That an urgent review be undertaken to reconcile the two accounting systems.

**Public Hearing and Written Representations (Paragraph 20)**

- (21) The area patrolled by Parking Attendants needs to be broadened to cover all relevant areas of the District where parking restrictions exist.

- (22) That guidance, including their ambassadorial role, should be issued to Parking Attendants.

- (23) The abuse of visitor parking permits needs to be investigated to ensure that only the correct amount of vouchers can be issued. (See above recommendation No 18).

- (24) The parking contraventions by particular taxis need to be investigated and licences reviewed in cases of serious or repeated breaches.

- (25) Correspondence to the public to be made more user-friendly and less confrontational.

# **PARKING ENFORCEMENT SCRUTINY PANEL**

## **1 INTRODUCTION**

- 1.1 The Scrutiny Panel, comprising of Councillors Lewis Norris (Chairman), Jennie Bukht and John Purchase, was set up by the Development and Planning Scrutiny Committee at its meeting of 12 June 2002 to look into aspects of the Parking Enforcement Service throughout the District. This followed the Officer recommendation that the Service be reviewed since the introduction of additional staff in September 2001 and the submission of a petition to full Council on 25 July 2002. This was subsequently passed on to the panel from the Development and Planning Scrutiny Committee and was considered with all the other evidence.
- 1.2 Although there may be some references to the income from parking charges received by the Council in this report, the actual charging structures did not form part of this review. The Panel wishes it to be noted, however, that all references made by members of the public about parking structures and charges at the Public Hearing have been passed on to the relevant Officers and Committees for further consideration.
- 1.3 The on-street and off-street parking charges and restrictions throughout the District are the subject of annual reviews and are only introduced after full public consultation and debate. Given this democratic process, it therefore naturally follows that the restrictions that have been agreed need to be correctly enforced. This will always be unpopular with those people who are caught and thus creates a pressured environment for those Officers of the Council who have to carry out the enforcement.
- 1.4 For off-street parking, the restrictions are necessary to ensure a turn over of spaces for the benefit of both car park users and local businesses. They ensure the appropriate use of the limited space within the District and the best use of each car park, either long or short stay, by penalising those vehicles that are parked incorrectly. They also give the Council an income with which to provide the car park service.
- 1.5 For on-street parking the restrictions play an even greater role in ensuring the free flow of traffic and reducing highway danger. Again by applying the restrictions correctly, the turnover of spaces is ensured for the benefit of local businesses and users. In addition to this they ensure that there are free spaces in those areas solely reserved for permit holders.
- 1.6 The work of the Parking Attendants should, therefore, be seen as a “deterrent” to those who abuse the charges and restrictions duly imposed by the Council rather than seeking to catch as many people as they can for the sole use of issuing Penalty Charge Notices (PCN’s).
- 1.7 One of the main aims of the Panel was to see if the Council was employing the right level of deterrence and whether, taking into account public opinion, this was both reasonable and appropriate.
- 1.8 By its very nature, the job of the Enforcement Service should be recognised as one of the most stressful undertaken by the City Council’s employees. The daily enforcement of parking restrictions receives much abuse from aggrieved drivers and needs careful handling if confrontational situations are to be prevented.

- 1.9 However, an overzealous enforcement regime, an accusation that has sometimes been levelled at the service, must not be allowed to prevail and more importantly, must be **seen** not to prevail.

## 2 DERIVATION OF PARKING POLICY

- 2.1 The Road Traffic Regulation Act 1984 (as amended) provides the basis upon which the administration of parking functions is carried out. Section 122 of that Act sets out the criteria under which local authorities are to operate.
- 2.2 In Sub-section 1 the prime purpose is to secure *“the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway.”*
- 2.3 In doing this Sub-section 2 requires local authorities to have regard to: -
- (a) the desirability of securing and maintaining reasonable access to premises;
  - (b) the effect on the amenities of any locality affected and the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run;
  - (c) air quality;
  - (d) the importance of enabling the passage of public service vehicles and of securing the safety and convenience of people using, or wishing to use them; and
  - (e) any other matters appearing to the local authority to be relevant.
- 2.4 The two duties in Sub-section 1 (movement and parking) are on occasions at odds with each other. Case law indicates that a local authority must take both considerations into account and balance them. Case law would also indicate that the matters in Sub-section 2 are intended to qualify the first duty in Sub-section 1 to secure the expeditious, convenient and safe movement of traffic.
- 2.5 Section 122 of the Act is of particular relevance to the enforcement of parking restrictions on street because of the close interrelationship between the two Sub-sections. Therefore in shaping an enforcement policy for on-street parking there are a number of different factors to be taken into account. While Section 122 also applies to off-street parking, the **prime** duty is to ensure that the provision of parking is both *“suitable and adequate.”* This clearly includes enforcement, because without observance of parking regulations a car park may cease to become *“suitable and adequate”*.

## 3 AGREED SCOPE

- 3.1 At its initial meeting, the Scrutiny Panel agreed the following scope:-
- The appropriateness of the level of staffing of the enforcement service.
  - Whether the service provides an appropriate level of deterrent.
  - The financial case for the enforcement service.
  - The enforcement guidelines for Parking Attendants.
  - The rota system and beats of the Parking Attendants.

- The effectiveness of the pay supplement in recruiting and retaining staff/reducing sickness absence.
- The pay and conditions of all staff.
- Staff morale.
- Penalty Charge statistics.
- Debt recovery procedure.
- The impact of overnight charging in the City centre.
- The way policy is derived.
- Coaches parking on-street.
- Use of CCTV in parking enforcement.
- Disabled parking enforcement.
- Alternative methods of enforcement in car parks.

3.2 This scope was subsequently agreed by the Development and Planning Scrutiny Committee at its meeting of 4 September 2002 with the addition of the overnight security provision of car parks.

## 4 **METHODOLOGY**

4.1 The review was conducted by face to face interviews with Management and Staff, consideration of both internal and external documents, written representations and comparative information from both neighbouring Council's and the National Parking Adjudication Service (NPAS).

A public hearing, previously advertised in the local press, was also conducted over two days in November 2002.

4.2 At that public hearing the Panel received lively and sometimes conflicting contributions and although disappointed at the lack of response from local large businesses and from the disabled with their particular perspectives on parking enforcement, overall it was felt that there was sufficient information to form a balanced opinion. This report does not set out all the evidence received although the Panel have taken into account all representations in coming to its conclusions. Where items of evidence are referred to, it is by way of illustration and there is no attempt to be exhaustive in our coverage.

4.3 It is not always possible to draw conclusions from this information, but simply present it. In the time available it was not possible to identify those factors of geography, income, expenditure and service requirements which would have enabled a full comparative exercise to be carried out. However, it was felt that simply presenting the information and allowing it to speak for itself had some value.

## 5 **APPROPRIATENESS OF STAFFING LEVELS**

5.1 It should be noted that the Parking Services Section not only covers the Enforcement Service for the whole of the City, the Coastal towns and the Rural areas but the provision and issue of Resident and Visitor parking permits, Season and Parking Cards and processing the vast amounts of correspondence, payments and refunds associated with the PCN process. The financial accounting of permits and PCN's is also carried out by the section.

**Administration** - Parking Services Manager and 9 Administration Staff.

- 5.2 At the inception of decriminalised parking in January 2000, the number of Administration staff was felt to be adequate, although a review of numbers was promised by the Head of Transportation and Engineering after 6 months. As yet this review has not been carried out despite the increase in the numbers of Parking Attendants in September 2001. It naturally follows that the increase in the numbers of PCN's has generated more work for the Administration and the pursuance of those who try to avoid payment. The correspondence throughput of the office, which increases substantially when appeals go to adjudication, is currently running at between 13000 and 14000 letters per year.
- 5.3 It should be noted that, as it is the owner of a vehicle who is responsible for payment of PCN's, then that owner has to be found in order to serve a notice. What is not always appreciated is that the records held by the DVLA are neither computerised nor always fully up to date. Therefore it requires a great deal of staff time to manually check and enter the data from these records onto the Council's database. The correspondence trail thereafter with the owners is also long and complicated and often full of abuse for the Administration staff.
- 5.4 A great deal of responsible work is done in the Section and there is a high level of commitment to be found amongst the staff. That the office runs well is reliant purely on the professionalism of the staff especially as at present there appears to be no slack for sickness or holidays.
- 5.5 It is understood the a new computer system, which could speed up the processing time of PCN's has been under review.

**Parking Attendants** - 1 Senior Supervisor, 5 supervisors and 25 Parking Attendants (Enforcement) and 9 Parking Attendants (Non Enforcement).

- 5.6 Whilst the total number of staff employed by the Council is 34, only 25 can be described as "true" Parking Attendants involved primarily on parking enforcement issues. Of the remaining 9 members of staff, 8 are employed at the Park & Ride and Coach Parks sites and serve no Enforcement role whilst the remaining employee deals exclusively with sign faults and repairs.
- 5.7 Since the increase in numbers of Parking Attendants and the introduction of a new Rota system in September 2001, the levels of absenteeism through sickness has fallen and it is understood that there has been some increase in morale. It has allowed the service to be more flexible by moving Parking Attendants between the City and the Coastal towns during busy periods thus increasing their presence on the streets and the hours on patrol. This visible presence should help to decrease congestion both on-street and in the car parks thus adding to the turn-over of vehicle movements.
- 5.8 Both at the public hearing and in written submissions, concerns were expressed that on occasions Parking Attendants appear to patrol in pairs giving the appearance that they "hunt victims" rather than deter those who prefer to disobey the regulations. Concerns were also raised that, with the exception of Sturry, Fordwich and Bridge, there have been no patrols carried out in the Rural areas.
- 5.9 However, the Panel considers that, given the number of car parks that need to be patrolled and the flexibility required to cover the whole of the Canterbury District, the number of Parking Attendants currently employed is adequate.

## Recommendations:

- (1) That the number of Administration staff be urgently reviewed and if necessary increased to allow for the deployment of staff and the flexibility of working practices.
- (2) That Parking Services should co-ordinate with the Parish Councils to ascertain whether patrols are required and at what times of the day.
- (2) The pairing up of Parking Attendants on patrol should be discouraged except for training and safety reasons.

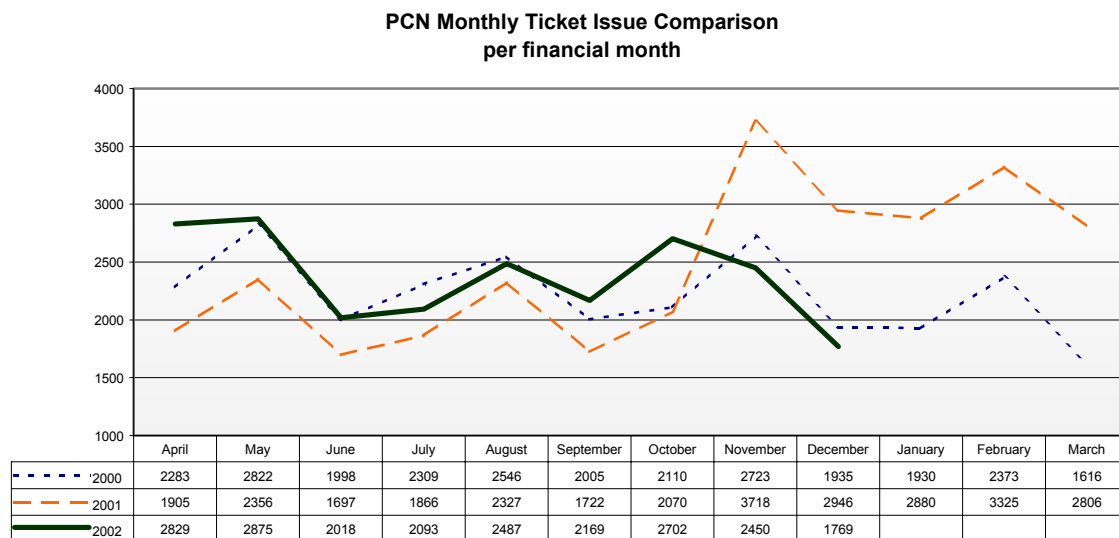
## 6 APPROPRIATE LEVEL OF DETERRENT

- 6.1 The appropriate level of any Enforcement Service is difficult to quantify in statistics alone. One has to ask what would the streets and car parks of the District be like if there were no parking charges or enforcement of regulations? Would there be a better turn-over of vehicles in the car park spaces; would the Residents and Businesses suffer if their permitted areas not be patrolled and would the congestion of our narrow roads and streets be any worse? The Panel think most strongly that it would be considerably worse.
- 6.2 Although there are no figures for the amount of time the Parking Attendants patrol various areas, at the present time the issue of PCN's is spread at about 50:50 between off-street and on-street and the number issued in the year 2001/2002 was 29,568. It could be said that this number is far too great and that it is purely a factor of the strictness of the Enforcement service. Conversely, it could also be said that it is purely a factor of the amount of people who choose to disobey the democratically agreed parking regulations throughout the District.
- 6.3 However, although individual responsibilities may vary across the county, the average number of PCN's issued per Parking Attendant across the District is low compared with those of other neighbouring Local Authorities.

	<b>Number of P/A's</b>	<b>PCN issued</b>	<b>Average Number of PCN's issued Per P/A</b>
Medway	19	48521	2554
Hastings	21	46059	2193
Maidstone	11	21650	1968
Thanet	13	20110	1547
Swale	8	12020	1503
Dover	11	16088	1463
Sevenoaks	6	8009	1335
Shepway	8	10121	1265
Canterbury	22/25*	29568	1344/1182*
Ashford	11	12491	1136

\* Variance in figures due to increase in numbers of Parking Attendants in September 2001 whilst the PCN yearly total is for 2001/02.

6.4 As can be see below, in the first few months following the increase in Parking Attendants numbers in September 2001, the number of PCN's rose dramatically before falling back to those of previous years.



6.5 The number of tickets sold in the car parks throughout the District has also risen dramatically (Daytime 24%, overnight 38%) over the last year, which would indicate that the parking enforcement regime has not deterred people from using the car parks throughout the District. (see appendix 1)

6.6 In the public survey carried out by the Panel, the greater percentage of respondents indicated that proper parking Enforcement aids traffic flow around the District, that it is helpful in making sure that parking spaces are used properly and that the number of Parking Attendants is about right.

## 7 ENFORCEMENT GUIDELINES FOR PARKING ATTENDANTS

7.1 The Panel feel that the word **guidance** should be used in this instance instead of **guidelines**. This would allow the Parking Attendants to apply more freedom in assessing each individual case on its own merits.

7.2 In order for the Parking Attendants to carry out their job in a consistent manner it is clear that they have to be given guidance that allows for flexibility and interpretation.

7.3 However, not all situations are the same and it is crucial that the correct leeway and tolerance are applied in every case. This discretion must be given to the Parking Attendants in such a way that it allows them to judge each case on its merits and only in the final analysis should a Penalty Charge Notice (PCN) be applied.

7.4 Having been given this discretion however it is imperative that the evidence collected by the Parking Attendant is factually correct and legal. The time delay in cases coming to the appeal stage is often long and the evidence written in the Parking Attendant's notebook is the only record of events that can be offered by the Council in defence of that appeal. Although the evidence required to be collected by the Parking Attendant before a PCN is issued has been tightened in recent months, there are some loopholes which should be closed in order to prevent miscarriages of justice in favour of either party.

- 7.5 It was also found that not all the lessons learnt from appeal cases, both locally and nationally, are fed back to the Parking Attendants to enable them to make the correct judgements and thus prevent future appeals.
- 7.6 Under normal circumstances, when a case is simple or fits the pattern of previous cases, the decision to allow a local appeal against a PCN is carried out by the Parking Services Manager. Each case is judged on its merits and often the advice and experience of a senior Parking Services Officer is sought to confirm the decision. Very few appeals, including those of a sensitive nature or those that go to the National Adjudication Service are taken to the Head of Transportation and Engineering for discussion.
- 7.7 It has been the policy of the Parking Services that in all cases, appeals that are heard by the National Adjudication Service are defended by written submission only, even though they are usually heard locally. However, in some recent cases it has become apparent that the adjudicator has placed more reliance on the evidence given by the appellant, particularly if they appear in person. The Panel felt that, although the evidence submitted by the Council is in itself sound, it could benefit from an impartial review at an early stage by others elsewhere in the Council.

### **Observation periods**

- 7.8 Of all the discretionary powers that should be given to Parking Attendants, the timing of the observation period is not only the most controversial but also the most important. The results from the public survey, written submissions and those interviewed are inconclusive because of the wide variance of opinion. More importantly there are no national guidelines to follow. The National Parking Adjudication Service merely states that “a reasonable time” must be allowed for loading and unloading and that “any vehicle must be allowed to wait for as long as may be necessary” for such a purpose.
- 7.9 Given that to do nothing would aggravate the situation and the fact that there are no national guidelines laid down, the Panel feel that the Council should attempt to define the word “reasonable” in the context of waiting times. For instance, “a reasonable time” should be to allow a person to obtain a parking ticket from a machine, but not to go across town on the pretext of getting change for the machine. It should also be a time which will allow for the activity of loading or unloading of goods to be observed, whatever the size and quantity of the goods or to the destination to which they are being delivered.
- 7.10 The Panel therefore recommend, that the reasonable observation time in car parks should be 10 minutes and for the loading and unloading of goods on-street a reasonable time should be 15 minutes. It should be made clear that this time allowance is merely for the Parking Attendant to observe that activity is actually taking place before taking any further action.

### **Recommendations:**

- (1) That in the guidance given to the Parking Attendants, the observation times before the issue of a PCN should be a minimum of 5 minutes to a maximum of 10 minutes for off-street and minimum of 5 minutes to a maximum of 15 minutes for on-street.**
- (2) That a panel of Members should be set up to review all cases where an appeal is made to the National Adjudication Service.**

- (3) That the local method for appealing be reviewed and made more transparent.

## 8 PAY AND CONDITIONS OF STAFF

- 8.1 At present the pay of Parking Attendants is set at Scale 2. In addition a market supplement, agreed in September 2001, is paid to all staff irrespective of whether they are employed on parking enforcement or on non-enforcement issues such as Park & Ride and Coach Parks.

The supplement is applied as follows:- £480 payable to all staff with fewer than 5 days absence due to sickness per year and £240 if sickness is up to 10 days per year. Nothing is paid if sickness exceeds these figures. In addition to this and in recognition of the added responsibilities, the enforcement staff receive an additional sum of £600 per year.

- 8.2 From the above figures it would seem that the East Kent average seems to be £12540 - £15098. The pay scales in Canterbury fall below these figures by approximately the amount of the added responsibility pay.

	Salary Range £	Overtime	Remarks
Ashford	13554 – 14601	Yes	7days/wk Mon-Fri 6-45am-10pm
Canterbury	13092 – 13779 (13692 – 14379 inc. supp)	No	7 days/wk 8am-6-30pm (Some evenings until 9pm)
Dartford	12045 – 15222	No	7 days/wk 8-15am–10pm
Gravesham	13122-14040 (+London weighting)	Rarely	7 days/wk Mon-Sat 7-30am-8pm
Hastings	12291 – 13395	W/ends only	7 days/wk 7am-midnight (Hours after 6pm @ time + one third)
Maidstone	12642 – 13872	Yes	7 days/wk 7-45am-10pm
Medway	12549 – 15957	??	Mon-Sat 7am-9pm
Shepway	9950 – 16245	W/ends only	7 days/wk 8am-5pm (40hr wk)
Swale	12230 – 15298	Limited	7 days/wk 8am-9pm (39hr wk)
Thanet	14352 – 15402	Yes	7 days/wk 8am-6pm (W/ends & evenings @ time + one third)

- 8.3 The current rota system introduced in September 2001 would appear to be somewhat inflexible and has been received with mixed feelings by the staff. Some feel it doesn't work whilst others feel that, with some minor modification, it works well. For instance, the rotas for the coastal towns are different to that in the City, which causes a differing pattern of days off between the two. On the coast there are occasions when the Parking Attendants work a different shift pattern to the Supervisors leaving them totally unsupervised for some of their shift.

- 8.4 What **is** clear however, is that the volume of traffic movements across the District is flexible (ie the coastal towns are busy during the summer months whilst the City is somewhat quieter during the University holidays) and there is a need to cover the Rural areas and evenings in the City.
- 8.5 It was found that the supervision of the Parking Attendants seemed to be inflexible in its delivery and that communications should be improved. The Parking Attendants were concerned that they were not always given full consultation on issues relating to cancelled PCN's and the reasons for not issuing them in certain areas.
- 8.6 There were concerns raised that the Parking Attendant's uniform was too militaristic and could lead to immediate confrontation with drivers. Concerns were also raised that certain aspects of the uniform were cumbersome and in the summer months uncomfortable.
- 8.7 However, the Panel feel that a uniform is appropriate given the importance of visual identification that is needed in both the enforcement and ambassadorial roles carried out by the Parking Attendants.

**Recommendations:**

- (1) That in order to recruit and retain high quality staff the pay scales of Parking Attendants be reviewed to include the £600 at present paid for added responsibility, thus bringing them in line with the East Kent Standard.**
- (2) The rota system should be reviewed to allow the flexibility needed to give cover across the whole of the District.**
- (3) The quality of feedback of information from Management to the Parking Attendants needs to be addressed.**

**Administration Staff -**

- 8.8 The pay structure of the Administration staff has been informally evaluated under the present Job Evaluation Scheme.
- 8.9 The Panel noted during the scrutiny process, that one member of staff left to go into another Department in a similar post and pay scale where the work and stress of the job was considerably less.
- 8.10 The Administration office is situated in a building which, although adequate for its purpose, has some fundamental problems that need to be addressed. It is a lightweight and temporary structure, fitted out with desks and furniture that have been mostly discarded by other Departments. It does little to inspire a team whose activities are one of the most high profile public services of the Council.
- 8.11 The files of PCN investigations containing customer account details together with various letters and forms relative to the case are, due to the shortage of space, openly stored in bags in the entrance to the Administration Office. The storage of Parking Attendants notebooks, vital in any adjudication procedure, are stored on open shelves within the office and there is no secure provision for the storage of parking permits.

- 8.12 There are no bars at the windows and, together with the fact that the computer terminals hold a vast amount of personal details, in the event of a fire or a break-in, both of these storage spaces would be vulnerable and the enforcement of PCN's would be severely disabled.
- 8.13 It should be pointed out that there is a little used office next door which could be utilised to great effect in the provision of storage.
- 8.14 The telephone system, although adequate, is far from ideal for members of the public to access in order to speak directly to the person dealing with their particular problem. When dealing with PCN's the staff frequently suffer abuse and because there is no monitoring system fitted, unless they actually hang up, the staff have to suffer the stress alone.

#### **Recommendations:**

- (1) The safe and secure storage of files needs to be urgently addressed, with the additional requirement for the provision of a fire-proof safe for the storage of permits.**
- (2) The provision of security at the windows needs to be urgently investigated.**
- (3) The provision of a dedicated telephone system with a recording facility needs to be urgently investigated.**
- (4) The pay and job descriptions of Parking Administration staff needs to be appraised.**
- (5) The previous recommendation be implemented through a new Council Job Evaluation Scheme which should (amongst other things) reflect issues of volume of work and levels of stress.**

## **9 FINANCIAL CASE FOR THE ENFORCEMENT SERVICE**

- 9.1 Contrary to a popular misconception, the money collected from the issue of on-street PCN's, Residents and Visitor Permits can **only** be used for local traffic management related purposes.
- 9.2 The total income received by the Council for the year 2001-02 from the above was £582,900. The expenditure set against this included salaries, costs of premises, supplies and services, capital charges and a central administration recharge which all came to £595,600; a deficit of £12,700. Also in 2001/02 was the cost of repayment to the CCC for the initial setting up of the de-criminalised service and this has now been fully re-paid.
- 9.3 The *projected* balance of income against expenditure for 2002-03 shows a net profit of £118,500. Given that the repayments to set up the Enforcement Service have now finished, it should be noted that this money could now be used for local transport management purposes.
- 9.4 The Panel would like to stress that they are satisfied that the Parking Attendants are not given targets for the issue of PCN's.

## 10 PENALTY CHARGE NOTICES (PCN's)

- 10.1 The total number of PCN's issued in 2001-02 throughout the District was 29,568. Of these 216 were appealed to the National Adjudication Service and of those 23 were classified as errors by the Parking Attendants. Comparisons to other neighbouring Local Authorities are as follows:-

	<b>PCN's issued</b>	<b>Number appealed</b>	<b>Refused by Adjudicator</b>	<b>PCN's allowed</b>	<b>Not contested by the Council</b>
Medway	48521	204	62	141*	73
Hastings	46059	53	18	35	9
Canterbury	29568	216	52	161*	134
Maidstone	21650	83	41	39	9
Thanet	20110	82	42	39*	15
Dover	16088	15	10	5	0
Ashford	12491	32	15	16*	13
Swale	12020	7	2	5	2
Shepway	10121	19	12	6*	4
Gravesham	9600	22	10	12	2

\* Denotes some appeals still awaiting decision.

- 10.2 The percentage of PCN's appealed against is shown at Appendix 2. It should be noted that, of the 161 appeals in Canterbury allowed by the Adjudicator, 134 were not contested by the Council. This was due mainly to either the inaccuracies of vehicle ownership derived from original information supplied by the DVLA or by the late submission of evidence not originally supplied to the Council by the appellant (ie production of permits, tickets/vouchers and disabled permits, proof of illness, abandoned vehicle etc). Of the remaining 27 appeals allowed, 23 were due to Parking Attendant errors, with only 1 due to Administration error and 1 allowed because of inappropriately applied loading and unloading restrictions.

## 11 DEBT RECOVERY PROCEDURES

- 11.1 As at 30 November 2002 there is an outstanding debt of £642,044 to the Council in unpaid fines. The majority of the fines will be paid off in due course. However, included in the £642,044 are balances of £58,068 from the calendar year 2000 and £176,728 from calendar year 2001. A decision will be taken soon on how much of these balances should be written off. At least £30,000 is owed by owners with 5 or more unpaid penalties. The recovery of these debts is dependant on the ability to trace the offenders and the procedures are long and often complicated. At the present time the pressure of work in the Administration section has led to a backlog of debt recovery files. In cases where there is persistent abuse by known offenders and there is no doubt about their place of residence, then the case is passed over to the bailiffs at a reasonably small cost to the Council.

**Recommendation: That a review of persistent defaulters be carried out on a regular basis.**

## 12 THE IMPACT OF OVERNIGHT CHARGES IN THE CITY CENTRE

- 12.1 As can be seen from the table below, since the introduction of the overnight charging structure in the City Centre car parks, the actual number of vehicle movements has increased by an average of 38%.

	Sept 01	Sept 02	Diff	%
<b>Short Stay</b>				
Watling Street	1068	1286	218	20%
Pound Lane	1579	2273	694	44%
Castle Street	112	194	82	73%
Dover Street	413	529	116	28%
Longport	184	348	164	89%
Millers Field	406	635	229	56%
Northgate	212	197	-15	-7%
North Lane	685	780	95	14%
Queningate	894	1091	197	22%
Rosemary Lane	114	78	-36	-32%
St Radigunds	1505	2506	1001	67%
<b>Long Stay</b>				
Castle Row	628	854	226	36%
Holmans Meadow	1079	1108	29	3%
Station Rd West	427	832	405	95%
St Johns Nursery	42	165	123	293%
<b>Sub Total</b>	<b>9348</b>	<b>12867</b>	<b>3528</b>	<b>38%</b>

## 13 COACHES PARKING ON-STREET

- 13.1 Where the regulations and road conditions allow, the setting down and picking-up of passengers is perfectly legal, although this is a dangerous practice for foreign coaches as the passengers are exiting into the road. The City Council is committed to providing for both dropping off and parking for coaches and this is the subject of ongoing debate by the Council Members. Like all other vehicles, empty coaches can park anywhere on unrestricted roads providing they do not cause an obstruction.

### **Recommendation**

**That whilst this is perceived to be not such a problem now to residents, the Joint Transportation Board be requested to keep this matter under review.**

## **14 DISABLED PARKING ENFORCEMENT**

- 14.1 Despite the lack of comment from disabled permit holders, the following are the views of the Panel.
- 14.2 Both the abuse of disabled parking bays and the misuse of the disabled permit system is a national problem which is difficult to enforce and even harder to prevent.
- 14.3 The difficulty for the Enforcement Service is that the driver of a vehicle does not have to be the holder of the permit, providing they are dropping off or picking up the permit holder. Although the misuse of parking bays by non-permit holders is easier to enforce there are, unfortunately, some people who still abuse the system by fraudulently using permits. Again this is not easy to enforce.
- 14.4 On the occasions where disabled permits are displayed incorrectly for whatever reason and the Parking Attendants issue a PCN, the Parking Services Manager will normally rescind the notice. A letter is then sent to the holder reminding them of the reason that the PCN was issued and this may unfortunately cause distress and confusion. However, if a further breach of the regulations takes place by a permit holder, then another PCN will be issued.

## **15 USE OF CCTV IN PARKING ENFORCEMENT**

- 15.1 The Panel were informed that the CCTV system was covered by a strict Code of Practice and was used purely for public safety and the prevention of crime. Amongst other things it is used to observe vehicles where there may be a problem with safety, traffic flows and where Parking Attendants were concerned for their personal safety.
- 15.2 Whilst there have been instances where the operators have directed the Parking Attendants to a particular vehicle, this is only done where there is a perceived traffic problem. The only observation times noted in the CCTV room are put in the operators individual logs for legal reasons and are not used for any other purpose. Although traffic management is a legitimate use of the system, it has never been used in the pursuance of a PCN nor have the CCTV records ever been requested as evidence.
- 15.3 There is regular contact between the Parking Attendants and the system operators but that is both for personal safety reasons (the Parking Attendants personal alarms go directly to the operators) and to allow for a free flow of traffic in the cramped streets of the City. It was also reported to the Panel that any individual is always able to contact the CCTV operation room at any time and that visits are more than welcome but have to be by prior arrangement.

## **16 OVERNIGHT AND EMERGENCY COVER**

- 16.1 At present there is no "out of office hours" cover and Senior members of the Parking Services Section are frequently called out to deal with a very wide range of problems and emergencies; not all of which are service related. Call-outs have ranged from technical problems in car parks, dangerous/abandoned vehicles, IT issues with

programmes and ticket machines to homeless people, fire and floods, vandalism and even enquiries from Councillors.

- 16.2 At present these call-outs are carried out by the good will of the Officers concerned and no extra payment is made for these services.

**Recommendation: That the provision of a Stand-By rota be set up to provide for a more efficient and robust cover on Parking related matters and that appropriate payment be made.**

## 17 **ALTERNATIVE METHODS OF ENFORCEMENT**

Whilst this topic was in the original scope of the review, the Panel felt that the implications went beyond its defined remit. Essentially, alternative methods apply to off-street parking might include a barrier is used to prevent a vehicle from exiting unless payment is made. Whilst there are attractions with such methods, not all car parks lend themselves easily to the machinery required and in those that do there are serious implications for capital spending. The Panel therefore decided simply to suggest that this needs to be the subject of a detailed study at a later date.

## 18 **TOPICS NOT WITHIN THE ORIGINAL SCOPE**

### **On-street Visitors Vouchers**

- 18.1 The scheme allows for 6 vouchers at a charge of £1.50 each that allow residents' visitors to park for up to 24 hours in certain places at a reduced rate. The purchaser has to produce some form of evidence that they live in the District before the vouchers are issued. They can be purchased at either of the Reception Desks or at the Cashiers Desk in the Council Offices.
- 18.2 It came to light during the Scrutiny process there appears to be a lack of control of the voucher scheme. The vouchers can be purchased at each of the desks and can be bought as many times as is wished in any one day with proof of residency not always required. It is alleged that certain tradesmen are using the system to allow for cheaper parking whilst carrying out their trade in the District.

### **Consolidation of the Accounting System**

- 18.3 When decriminalised parking was introduced in January 2000, a computer software program ("Langdale") was adopted because, although incompatible with the Council's Management Information System (Integra), it provided the Parking Services with a database ideal for the storage of all the required information relating to PCNs from issue through to cancellation.
- 18.4 Since that time however, full reconciliation of the two systems has not been achieved in order to confirm that debits and credits are correctly reported in the accounts. Despite several requests for audit reports by the Administration staff, there is still no regular balance kept between the money reportedly in the system and that received by the Council.

- 18.5 The amount of income generated by PCNs is quite substantial and other than the Administration accounts, there is no way of knowing its true value to the Council. This exposes the staff to accusations of false accounting and the Council to a high risk of criticism from outside auditors.

**Recommendations:**

- (1) That a review of the Visitors Voucher system be carried out at the earliest opportunity to ensure that only the correct amount of vouchers can be issued.**
- (2) That a valid proof of residency be required to be provided at all times.**
- (3) That an urgent review be undertaken to reconcile the two accounting systems.**

**19 PUBLIC SURVEY**

- 19.1 As well as a Public Hearing the Panel sent out 71 short questionnaires to both large and small businesses throughout the District, together with a selection of members of the public. They were also distributed to the police and Local Council Members although not all questions were answered by all respondents.

- 19.2 The number of respondents to the survey was 47 and the results to the questions are as follows -

- 1) Do you think that correct and proper Parking Enforcement aids traffic flow in and around the District?

Yes	-	40 (85.1%)
No	-	5 (10.6%)
Don't know	-	2 (4.3%)

- 2) Do you think that correct and proper Parking Enforcement is helpful in making sure that parking spaces are available to as many people as possible and in encouraging visitors to the District?

Helpful	-	35 (74.9%)
Not helpful	-	5 (10.6%)
Don't know	-	4 (8.5%)

- 3) Do you think that Parking Attendants provide an effective deterrent to illegal parking?

Yes	-	34 (72.3%)
No	-	11 (23.4%)

- 4) What is your impression of the general number of Parking Attendants in the District?

Too many	-	3 (6.8%)
Not enough	-	18 (38.3%)
About right	-	25 (53.2%)

- 5) Which of the following problem areas do you think should be covered by regular daily Parking Enforcement?

Outside schools	-	32 (68.1%)
City/Town main shopping areas	-	33 (70.2%)
Pedestrianised areas	-	32 (68.1%)
Residential streets	-	13 (27.7%)
Villages	-	10 (21.3%)
All areas	-	8 (17.0%)

- 6) How much leeway do you think Parking Attendants should allow for drivers whose parking time has expired?

None	-	2
5 mins	-	19
10 mins	-	8
15 mins	-	15
Each on its merits	-	3

- 7) Do you think that night time charges in the City has had a significant effect on the number of people visiting the City during the evenings?

Yes	-	19
No	-	18
Don't know	-	9

- 8) Have you had any direct contact with the Parking Services section in the past 2 years?

Yes	-	28 (59.6%)
No	-	16 (34.0%)

- 9) If yes, how did you find the staff?

		<b>Yes</b>	<b>No</b>
Helpful	-	24 (51.1%)	1 (2.1%)
Polite	-	27 (57.4%)	0
Professional	-	26 (55.3%)	0

- 10) Would you be interested in meeting the Panel personally?

Yes	-	19 (40.4%)
No	-	16 (34.0%)

## 20 PUBLIC HEARING AND WRITTEN REPRESENTATIONS

- 20.1 With the exception of one or two points, the comments in the written representations were, unfortunately, too specific and not within the remit of the Panel. The relevant comments are contained below.

- 20.2 Despite the recent press coverage in which the Enforcement regime of the City Council was described as being too draconian, the Panel found that the number of people who attended the Public Hearing was somewhat disappointing. With the exception of members of the Parking Reform Action Group and the Canterbury Independent Traders Association, the only other attendees were four independent members of the public and five City Councillors.
- 20.3 It must be stated at this point that some of the information submitted to the Panel from the members of both PRAG and CITA was both speculative and unsubstantiated. The overall impression given by both groups was that the effect of the policy of the Enforcement Service was to drive the motorists away from the City and that, as a result of this policy, the smaller traders were suffering and being forced out of business. It was also alleged that the Parking Attendants were over-zealous in their duties and that the use of CCTV was often used to identify breaches of parking control.
- 20.4 In light of these accusations, the Panel felt that it was only right to give time for both PRAG and CITA to collect any evidence that they might have and allowed an extension of three weeks for the submission of this evidence. With the exception of one letter from a member of CITA pointing out numerous closed businesses in the St Dunstan's area, Northgate and Palace Street, there has been no new evidence forthcoming. This letter does not contain any evidence, however, to suggest that these businesses were forced to close because of the Enforcement policies of the Council.
- 20.5 A summary of the **relevant** points raised in the Hearing are as follows:-
- 20.6 **Disabled parking provision was being abused** - Members of the public are abusing disabled parking bays either by totally ignoring the signs or by misusing disabled parking permits.
- 20.7 **The profile of the Parking Attendants needs to be raised** - despite the difficulties of the job, it was felt that the initial approach of the Parking Attendants is vital in the public perception of their duties. There is a great need to counter the accusations that they are employed purely to obtain an income for the Council and at any cost.
- 20.8 **There needs to be consistency in observation times** - this is covered earlier in this report.
- 20.9 **Areas covered by the Parking Attendants needs to be broadened** - the whole of the District should be covered by enforcement and better use could be made of Parish Councils to enable the Enforcement team to cover the rural areas at times and dates suited to problem areas.
- 20.10 **Loading and unloading at business premises** - it was stated that Parking Attendants specifically targeted the businesses in Palace Street and thus disrupted deliveries. Some method ought to be devised whereby delivery vans should be allowed a permit to be displayed whilst loading and unloading. (See observation times above -pages 9 and 10).
- 20.11 **The specific use of CCTV by Parking Attendants in their observations** - this statement led to the Scrutiny Panel conducting an interview with the Principal Community Development Officer responsible for CCTV operation followed by a visit to the CCTV room - See Section 16.

- 20.12 **The effects on theatre ticket sales due to overnight charges** - The Director of the Marlowe theatre informed the Panel that approximately 80% of his customers travel by car and that ticket sales had actually increased since de-criminalisation. He also stated that, although he had voiced reservations when the charges were introduced, the fact is that the sale of tickets have increased in the last 12 months by 8.2% to approximately 265,000. This means that some 200,000 persons have travelled to the theatre by car in that time.
- 20.13 Other statements put to the Panel on this were :-
- (i) initially there was a communication problem over the charges because the signage was not very clear about overnight parking, but these have been largely overcome as people have become used to it. However, there are still some issues over the display of information, especially relating to the time at which the charges begin.
  - (ii) It was considered that the time allowed for overnight parking should be increased from 7-30am to 8-30am.
- 20.14 **Abuse of Resident and Visitors permits** - points were raised about how easy it was for tradesmen to obtain visitor permits to enable them to park more cheaply during the day (See pages 16 and 17) and that there was abuse by some drivers parking in bays specifically reserved for residents. In both cases it was felt that Enforcement of the rules should be tightened and if necessary more Parking Attendants employed to carry out this enforcement.
- 20.15 **Parking abuse by taxis** - it was stated that although the number of taxis throughout the District was on the increase, there seemed to be very little enforcement despite the number of taxis apparently parking other than in taxi ranks. In some cases, notably in the St. Dunstan's area, the problem is getting worse leading specifically to traffic congestion.
- 20.16 It should be noted that the following PCNs were issued to taxis since the introduction of de-criminalisation:-
- |                                    |   |                                  |
|------------------------------------|---|----------------------------------|
| Hackney Carriages (214 registered) | - | 58 vehicles issued with 102 PCNs |
| Private Hire (110 vehicles)        | - | 11 vehicles issued with 20 PCNs  |
- 20.17 **Policy and appeals process of other adjacent local authorities** - the point was raised that the Council should look into the way other adjacent local authorities determine appeals against PCN's and whether any lessons could be learnt.
- Subsequent action by the Panel**
- 20.18 The local authorities consulted were Shepway, Thanet, Dover and Ashford. In all cases appeals at the local level are decided by the Parking Services Departments and, with the exception of Ashford, there appear to be no laid down policies. In Ashford the policy was approved by the leaders of the Political groups and, being confidential, only the Administration staff have access to it.
- 20.19 **Parking guidelines and Enforcement** - with the exception of PRAG and CITA there was a general feeling that, in order to give an balanced and even-handed service, guidelines should be issued to Parking Attendants.

- 20.20 Whilst it was stated that these guidelines should be flexible enough to allow some discretion to the Parking Attendants, it was also stated on several occasions that they should be implemented strictly.
- 20.21 **Impersonal and confrontational content of correspondence from Parking Services** - this was touched on by several people and was also pointed out strongly in the written evidence submitted to the Panel.
- 20.22 The letters from Parking Services often seem curt and by no means user-friendly and in a certain case were construed by the recipient to be rude and dismissive. The anxiety and distress caused cannot be overstated, particularly with the elderly.

**Recommendations:**

- (1) **The area patrolled by Parking Attendants needs to be broadened to cover all relevant areas of the District where parking restrictions exist.**
- (2) **That guidance, including on their ambassadorial role, should be issued to Parking Attendants.**
- (3) **The abuse of visitor parking permits needs to be investigated to ensure that only the correct amount of vouchers can be issued.**
- (4) **The parking contraventions by particular taxis need to be investigated and licences reviewed in cases of serious or repeated breaches.**
- (5) **Correspondence to the public to be made more user-friendly and less confrontational.**

The names of attendees are in Appendix 3. The notes of the public sessions have been agreed with the attendees and are available if required. Details of the written representations received are shown in Appendix 4 and these are available if required.

**21. CONCLUSIONS OF THE PANEL**

- 21.1 After a full and robust scrutiny of the Parking Enforcement Service, the Members of the Panel feel that, notwithstanding the recommendations contained in this report, the Enforcement regime is effective and provides a good level of deterrent.
- 21.2 Although difficult to quantify, given the size of the District, the unsuitability of many of the narrow streets for vehicular traffic and the number of car parks to be covered, it is felt that the present number of Parking Attendants employed by the Council is set at the correct level. The fact that the number of vehicle movements throughout the District has steadily risen over the past 18 months is also indicative that the level of Enforcement employed is not discouraging trade.
- 21.3 There is, however, a perception by some that the service is too draconian. Whilst there are some concerns that the service needs to be made more transparent and accessible, the Panel nevertheless feel that the correct balance must be struck in addressing these and that in so doing the present level of Enforcement should be maintained.

## **ACKNOWLEDGEMENTS**

The Panel would like to express their thanks to all the Officers, members and the public who have been involved in assisting their recommendations.

F:\textprod\wpcttee\REPORTS\w16\parking Scrutiny report.doc

# Appendix 1

## Canterbury Car Park Statistics - Based on Tickets Sold September 2002 compared to September 2001

	Sept 01	Sept 02	Diff	%
<b>Short Stay Premium</b>				
<b>Overnight Overnight</b>				
Walling Street Surface	1068	1288	218	20%
Pound Lane	1579	2273	694	44%
<b>Short Stay</b>				
Castle St. MSCP	112	194	82	73%
Dover Street	413	529	116	28%
Longport	184	348	164	89%
Millers Field	406	635	229	56%
Northgate	212	197	-15	-7%
North lane	685	780	95	14%
Queningate	894	1091	197	22%
Rosemary Lane	114	78	-36	-32%
St. Radigunds	1505	2506	1001	67%
<b>Long Stay</b>				
Castle Row	628	854	226	36%
Holmans Meadow	1079	1108	29	3%
Station Rd West	427	832	405	95%
St. Johns Nursery	42	165	123	293%
Sub Total	9348	12876	3528	38%
<b>Park &amp; Ride Sites</b>				
Wincheap				
Sturry Road				
New Dover Road				
Sub Total				
Grand Total	9348	12876	3528	38%

	Sept 01	Sept 02	Diff	%
<b>Daytime Daytime</b>				
	27227	27751	524	2%
	13871	17363	3492	25%
	14222	31098	16876	119%
	4079	4112	33	1%
	2254	5889	3635	161%
	3819	4453	634	17%
	4271	3758	-513	-12%
	6036	6342	306	5%
	10921	12007	1086	10%
	2134	1795	-339	-16%
	11426	12412	986	9%
	4755	4693	-62	-1%
	7805	6762	-1043	-13%
	4170	6300	2130	51%
	2808	3616	808	29%
Sub Total	119798	148351	28553	24%
	16063	14013	-2050	-13%
	13746	13763	17	0%
	8420	13625	5205	62%
Sub Total	38229	41401	3172	8%
Grand Total	158027	189752	31725	20%

	Sept 01	Sept 02	Diff	%
<b>Totals Totals</b>				
	28295	29037	742	3%
	15450	19636	4186	27%
	14334	31292	16958	118%
	4492	4641	149	3%
	2438	6237	3799	156%
	4225	5088	863	20%
	4483	3955	-528	-12%
	6721	7122	401	6%
	11815	13098	1283	11%
	2248	1873	-375	-17%
	12931	14918	1987	15%
	5383	5547	164	3%
	8884	7870	-1014	-11%
	4597	7132	2535	55%
	2850	3781	931	33%
Sub Total	129146	161227	32081	25%
	16063	14013	-2050	-13%
	13746	13763	17	0%
	8420	13625	5205	62%
	0	0	0	0%
Sub Total	38229	41401	3172	8%
Grand Total	167375	202628	35253	21%

## Appendix 2

### Percentage of PCNs appealed against

Enforcement Areas	Total PCN appealed	PCN's Issued	%PCN's Appealed
Manchester	902	125747	0.72
Brighton	31	100730	0.03
Birmingham	29	73624	0.04
Northampton	76	61451	0.12
Bristol	166	61317	0.27
Reading	611	58254	1.05
Bolton	98	51229	0.19
Oxford	143	50387	0.28
Medway	204	48521	0.42
Luton	92	48153	0.19
Portsmouth	363	46634	0.78
Hastings	53	46059	0.12
Plymouth	298	43148	0.69
Sefton	53	40527	0.13
Sandwell	118	38816	0.3
Trafford	43	38463	0.11
Watford	73	37313	0.2
Canterbury	216	29568	0.73
Southend	50	27254	0.18
Tunbridge	114	27107	0.42
Salford	38	26258	0.14
York	22	25525	0.09
Bedford	68	22777	0.3
Salisbury	49	22386	0.22
Maidstone	83	21650	0.38
Winchester	18	20888	0.09
Thanet	82	20110	0.41
Neath	76	19644	0.39
Taunton	31	18829	0.16
Stoke	127	17413	0.73
B'mouth	23	17377	0.13
Oldham	0	16567	0
Dover	15	16088	0.09
Bucks	39	14036	0.28
Tonbridge	13	12829	0.1
Ashford	23	12491	0.26
Swale	7	12020	0.06
Shepway	19	10121	0.19
Carlisle	0	9623	0
Gravesham	22	9600	0.23
Sevenoaks	1	8009	0.01
Hereford	4	6978	0.06
Barrow	9	6101	0.15
Dartford	5	5087	0.1
3 Rivers	1	4275	0.02
Norwich	0	2995	0
S'hampton	0	2371	0
S/Lakeland	0	180	0
M'Keynes	0	0	0

## **Appendix 3**

### **Names of attendees at public meetings**

Mr D Lee  
Ms D Barwick  
Mr W Feather  
Mr G Thomas  
Mr S Disleris-Beck  
Mr M Everett  
Mr I Robinson Ferrars  
Councillor N Eden-Green  
Councillor Miss J Samper  
Councillor W A Oakey  
Councillor M J Vye  
Councillor B R Hunter  
Councillor R H Cragg  
Mr M Rundell  
Bob Bounds  
Graham Redman  
Mr J Jeffrey

## **Appendix 4**

### **Details of written representations received**

Councillor Halfpenny - congestion and obstruction in Whitstable High Street, enforcement protocols in the vicinity of schools, loading and unloading and observation times, parking on yellow lines by disabled badge holders and alternative tariffs.

Mr M Hoar - parking in Brunswick Square, Herne Bay

Mrs K Hook - parking in Sea Street, Herne Bay

Inspector Carver, Kent Police - enforcement of regulations and loading and unloading

Councillor Eden-Green - attitude of Parking Attendants, being Euro-Friendly, Parking Attendants being seen in pairs, nationally applied standards of enforcement.

T W Marsh - residents' parking in Cromwell Road, Whitstable

Councillor Mrs Attwood - unnecessary issue of parking tickets, content of letters from Parking Services and overnight parking vouchers

parking Scrutiny report.doc