



Wales Safer Communities Network  
4<sup>th</sup> Floor, One Canal Parade  
Dumballs Road  
Cardiff  
CF10 5BF  
[Safer.communities@wlga.gov.uk](mailto:Safer.communities@wlga.gov.uk)  
05 October 2023

## **Wales Safer Communities Network response to the Private parking code of practice: call for evidence**

Please note, no response to Sections 1, 2 and 5 have been given as they do not apply to the Network.

### **Section 3: Benefits to motorists, parking operators and landowners**

#### **3.1. Are you able to provide any evidence of benefits arising from the code to drivers and/or registered vehicle keepers that can be monetised?**

We are unable to offer evidence, however, from a community safety perspective it may be appropriate to link in with the National Fire Chiefs Council or/and the National Police Chiefs' Council; we understand they have completed significant work in respect of the quantitative cost of reacting to emergency service call outs. By maintaining transparency and clear codes of conduct the public may be less inclined to park in unmanaged, potentially less safe parking spaces that may place motorists or their property at risk of harm (i.e. less lighting, lack of CCTV, less footfall could lead to more break-ins, vehicle theft or damage, muggings or assaults etc.)

#### **3.2. Are you able to provide any evidence of benefits arising from the code to parking operators that can be monetised?**

We are unable to offer evidence, however, anecdotally if services and charges are fair and proportionate then there will be trust between the local community and the parking operator. Consequently, it is likely that more people would use the facility. We know from speaking to our Anti-Social Behaviour practitioner colleagues that places that have higher footfall, good lighting, CCTV deterrent and security attendance is less likely to attract Antisocial behaviour and illegal activity including car parks.

#### **3.3. Are you able to provide any evidence of benefits arising from the code to landowners that can be monetised?**

See our answer to question 3.2.



**3.4. Are you able to provide any additional information on any benefits arising from the code to either drivers, registered vehicle keepers, parking operators or landowners that can be expressed in non-monetised terms (which is not currently presented in the draft impact assessment)?**

Whilst in principle, we support the code and support the desire to increase fairness we wish to ensure accessibility is also recognised which would benefit all parties. Signage must be clearly displayed with jargon free language to assist all members of the public to understand what they are agreeing to. We also wish to highlight the need for access to letters and information in the Welsh language, for services operated in Wales. We would direct you to the [Welsh language standards \(welshlanguagecommissioner.wales\)](http://welshlanguagecommissioner.wales) for more information should you require any additional information or assistance.

**Section 4: Questions relating to behavioural change**

**4.1 The deterrent effect is frequently cited as a reason to maintain existing parking charge and debt recovery fee levels. The general argument here suggests that existing parking charge limits provide a deterrent against non-compliant parking, with existing debt recovery fee limits providing an additional deterrent for those who do receive charges to pay those charges before it progresses to the debt recovery stage.**

- a) If you agree that existing parking charge limits provide an effective deterrent against non-compliant parking, please provide evidence to support this view.
- b) If you agree that existing debt recovery fee limits provide an effective deterrent against non-payment of issued parking charges, please provide evidence to support this view.
- c) More generally, can you provide any additional evidence on behavioural responses to changes in parking charges and/or debt recovery fees?

**c)** Whilst as a Network we are unable to provide evidence, we would however agree with your analysis within the Impact Assessment which recognises that despite any changes there will be a small percentage of people who will refuse to pay the fee even when instructed to do so in court.

As a Network, we would agree with the code of Practice you have drafted in principle, allowing for changes to accessibility and incorporating the Welsh language.

**4.2 If the code is adopted using the current limits on parking charges and debt recovery fees (i.e. option 1), how would you anticipate the number of parking charges issued would change over time? Please provide evidence to support your response.**

The Network does not have any detail on how this could impact over time.



**4.3 Would you anticipate that a reduction in the level at which parking charges are set would lead to an increase in non-compliant parking? If so, how would this vary at different levels of parking charge? Please provide further evidence to support your response.**

As a Network we feel that anecdotally those people who will breach the rules will do so anyway, reducing the parking charges will make it much fairer and easier for members of the public to comply especially during the difficult financial climate. There is a risk that if the fees are increased too high or the terms are deemed to harsh that people will choose not to park in the car park but to park in other areas which could have a detrimental impact on the flow of traffic and on the ability for wider vehicles, such as emergency vehicles (such as Fire and Ambulance) to be able to pass to reach an emergency that could be life threatening.

**4.4 Would you anticipate that a reduction in the level at which debt recovery fees are set, or removing debt recovery fees for private parking charges altogether, would reduce the overall proportion of parking charges which are paid? If so, how would this vary at different levels of debt recovery fee? Please provide further evidence to support your response.**

As a Network we feel the removal of such services should be led by the industry, however we can see a benefit in reducing/ removing costs to decrease the amount of payment enforced onto members of the public making the payment more attainable and possibly more likely to be paid especially in light of the cost of living squeezing availability of finances to pay.

**4.5 Would you agree or disagree that lowering or removing debt recovery fees would lead to more county court claims? If so, to what extent? Please provide further evidence to support your response.**

We are unable to agree or disagree specifically. As a Network we would anticipate that from the arguments laid out in the Impact Assessment there may be a slight increase, however this may depend on how it is managed locally and how well signage and local communication with users is carried out.

## **Section 6: About you**

**6.1. What is your name or name of organisation on behalf of which you are responding?**

**6.2. I am responding primarily as a:**

e) Other (please specify)

**Wales Safer Communities Network** (which is made up of members from Policing, Local Authorities, Fire and Rescue, Probation and Third Sector)

**6.3. For parking operator respondents – which trade association do you belong to?** This does not apply to the Network.



**6.4. How many parking sites does your company manage?**

This does not apply to the Network.

**6.5. Where in the UK is/are your site/s located?**

The Network is based in Cardiff, hosted by the Wales Local Government Association, but represents the views of our members from across Wales.

**6.6. What proportion of your car parks are (in percentage terms)**

This does not apply to the Network.