



EUROPEAN PARKING ASSOCIATION

Response to the European Commission's Green paper on urban mobility

The European Parking Association (EPA), represents the parking industry from private and public sector with membership of national parking associations from 21 European countries. EPA is very happy to respond to the issues, raised in the public consultation Green Paper "Towards a new culture for urban mobility" of September 25th 2007.

Although EPA represents the parking industry in Europe, we are particularly conscious of the fact that parking is an integral part of the total mobility chain, supportive of human wellbeing and economic life.

Parking is not only about the needs of private cars in city centres. It is about managing limited space for vehicles in our cities, both on and off street, for the best interest of travellers, deliveries, residents, visitors and businesses. It is also about regulating and controlling the access for those visitors that for various reasons need to access the central areas by vehicle, to achieve the best value to the city area. Effective traffic management is critical to enable the main functions of cities in Europe, living, working and entertainment for residents and visitors are to be maintained and enhanced. Thus accessibility in the widest sense and variety is crucial for economic welfare and traditional urban life. Parking is a key part of this and can be an essential tool for public decision makers to achieve the best outcomes for the city.

Using price mechanisms by charging for parking in the central urban areas and moving parked cars from on-street and surface facilities to purpose-built parking structures (underground or multi storey car parks) is already a common practice to improve the environment in historic inner-cities – and has been so for many years, with regulated on-street parking in streets with lower traffic densities. Public authorities (setting the policies) and private, public and mixed parties (operations execution, enforcement and financing) are working closely together in partnerships to achieve this and more. This approach is also vital to prioritising the use of limited parking space, such as for residents in housing areas or for shoppers and deliveries in shopping areas.

The European Parking Association is the platform where public authorities, operators, vendors and consultants from the parking industry in 21 member countries meet to exchange experience. The European Parking Association itself has no direct financial or political interest in the parking business in any of the EC countries.



The parking community, represented by EPA can contribute to the challenges outlined in the Green Paper in the following way:

- Contributing to the economic and environmental quality of inner-cities by supporting and operating according to parking and pricing policies to achieve prioritised access to sensitive areas.
- Managing roads and parking spaces to ensure that agreed priorities are effectively implemented.
- Creating investment funding by working under concessions, where the public sector stays in control by setting the policies while partners in the public, private and mixed sectors provide the operational expertise
- Providing innovation capacity within the parking industry (both operators and suppliers) to interpret and respond to user needs offering operational and technological tools and instruments.
- Contributing significantly to the proposed European Mobility Observatory through its network of parking professionals in 21 European countries.

In the next section the challenges, as formulated in the paragraphs 2.1 to 2.5 of the Green Paper “Towards a new culture for urban mobility” , will be addressed more specifically, with reference to the individual questions, raised in the Green Paper document:

2.1 Towards free flowing towns and cities

Q1: Should a “labelling” scheme be envisaged to recognise the efforts of pioneering cities to combat congestion and improve living conditions?

EPA would support such an initiative

Q2: What measures could be taken to promote walking and cycling as real alternatives to car?

Parking infrastructure is not just about car parking. It can be a focal point of activities and mobility as at park and ride and similar sites. It can also be used for bicycle parking and can promote cycling and walking from there, including bicycle parking, ‘bike and ride’ and bicycle hire.

Q3: What could be done to promote a modal shift towards sustainable transport modes in cities?

The Green Paper emphasises the need for an adequate parking policy to reduce the use of cars in city centres. It is to be stated clearly that it is not the aim of the parking industry to maximize the parking capacity but to optimise the use of the (limited) capacity provided, especially on street.



Parking enforcement, an integrated pricing strategy related to parking fees and access charges, an increase in the quality of public transport together with the application of co-modality notions are the solution to most of the mobility headaches. Differentiated fees should reflect the limited availability of public space and parking capacity in the central urban areas and prioritised uses. There is little value in such low fees, that available parking spaces are oversubscribed with extensive searching traffic, Not only does this add to congestion and environmental pollution but detracts from a city's attractiveness as surveys have shown that motorists place availability of a parking space as more important than the price of that space. At the same time fees that are too high, leaving spaces empty, are of no use. Getting the right balance ensures that parking spaces are available at the lowest realistic price, as influenced by the market.

Parking should be seen as part of the mobility management chain and the parking industry is ready to take a share and the responsibility in this management role.

Examples can also be found in Park & Ride facilities at railway and bus stations in suburban areas, where secured parking is provided at low cost. If this results in losses, these may be recovered by higher charges in parking facilities in inner-cities.

The parking industry, under direction of local public authorities and private land owners, is increasingly responsible for its own enforcement. This is both far more effective than conventional police enforcement and also releases scarce police resources for higher priorities.

2.2 Towards greener towns and cities

Q4: How could the use of clean and energy efficient technologies in urban areas be further increased?

Concentration of parking and adequate guidance contribute to reduced 'searching traffic', looking for vacant on-street spaces and air pollutant emissions. In inner-cities as much as 50% of the traffic is in search of a parking space. Reducing traffic in inner cities should be seen as more important than the reduction of emissions of the traffic in inner cities.

Eco-driving could be supported by installing networks of electrical recharging points in car parks and pick-up & drop-off points for electrical city cars in the car parks at the edge of the urban areas and in the city centre. This would ensure a reduction in the amount of conventional traffic in city centres as these could be left on the edge of these areas. Parking infrastructure provides a focal point for this type of transfer and can also be used to encourage car sharing and car clubs, with the same effect.



New technology allows us to build car parks today, using pollution reducing materials such as special absorbent coatings on the walls of entry/exit ramps or collection of particulates using innovative electrostatic systems.

Q5: How could joint green procurement be promoted?

EPA has no specific views on this question.

Q6: Should criteria or guidance be set out for the definition of Green Zones and their restriction measures? What is the best way to ensure their compatibility with free circulation? Is there an issue of cross border enforcement of local rules governing Green Zones?

Greener towns and cities are also supported by parking policies and pricing strategy, where high parking fees in the central urban areas discourage parking of cars in the city centre for those, who do not have the highest priority. In on-street areas parking enforcement must be part of the implementation of the mobility policy, to ensure its effectiveness. European action to enable cross border enforcement of these regulations is urgently needed as foreign registered vehicles are effectively immune from must enforcement. Without this, increasing volumes of foreign registered vehicles will wholly undermine initiatives such as green zones and other enforcement.

Q7: How could eco-driving be further promoted?

As we have pointed out in response to question 4, parking infrastructure can be used as a focal point to provide incentives for electric and similar eco-friendly vehicles.

2.3 Towards smarter urban transport

Q8: Should better information services for travellers be developed and promoted?

Cruising traffic, searching for a parking space is a major issue for congestion, quality of life, pollution and safety in inner cities: according to surveys this could be up to 50% of the traffic in inner city areas. No one better but the parking industry can provide actual data about parking space availability and conditions, to discourage search traffic. This can be done through further use of conventional parking guidance systems but also through incorporating live parking information in satellite navigation systems.



Q9: Are further actions needed to ensure standardisation of interfaces and interoperability of ITS applications in towns and cities. Which applications should take priority when action is taken?

Even before standard interfaces and interoperability of ITS applications, common approaches to regulations and support organisations is crucial for successful and market-wide implementation. This will enable investment in ITS systems to be worthwhile and data updated, as the market will be consistent and wide enough for effective financing. Priority should be given to common electronic payment systems both for electronic tolls and road user charging. These same systems should also be used to allow for parking payments.

Q10: Regarding ITS, how could the exchange of information and best practices between all involved parties be improved?

Parking installations and equipment today have already reached significant levels of efficiency. Plugging in information related to parking availability is already possible today. What needs to be developed is further integration of this information into a context and format, that is more useful and better understandable for the citizens.

Access control systems of the car parks is already today linked to traffic information systems to provide guidance to travellers, moving into the city, where to park. Thus overload of the city centre area can be avoided and remote parking at less sensible locations can be promoted. Information about availability and pricing (higher fees for city centre parking, progressing in line with duration) can be added to information for on-board-units (OBU's) and navigation systems, in order to influence the choice where to park.

Especially at potential interchange areas adequate information on parking facilities in combination with public transport can promote the modal shift from private car to public transport. Those transfer points could change either the main transport mode (at short distance from departure) or the local transport mode near the end of the trip. Those interchange points can also be used for other services provided at the car park, such as car sharing, bicycle rental, pick up points for delivery goods (i.e. internet shopping) etc.

2.4 Towards accessible urban transport

Q11: How can the quality of collective transport in European towns and cities be increased?

Accessibility of collective urban transport of good quality is greatly enhanced by the presence of off street parking facilities, enabling the road to be used for more efficient public transport service, such as



through bus lanes. It is a matter of managing the collective road space adequately and promoting the construction of off-street structures may enable this to happen.

The parking industry can facilitate areas where specific types of parking is allowed and regulated, both on-street and off-street. These regulations must be safeguarded by proper enforcement. Thus obstructions, both to general traffic flows and to specific facilities such as bus lanes, by illegally parked cars can be avoided.

Q12: Should the development of dedicated lanes for collective transport be encouraged?

The provision of facilities such as bus lanes can provide significant improvements to the quality of public transport and can enable public transport vehicles to penetrate parts of cities where general traffic is excluded. To achieve these, it may be necessary to provide new off-street parking to take vehicles displaced from streets where bus lanes are needed. However, as mentioned in response to question 11, dedicated lanes must be effectively enforced to be worthwhile, and in some countries the parking industry does this enforcement very efficiently.

Q13: Is there a need to introduce a European Charter on rights and obligations for passengers using collective transport?

EPA has no specific views on this question.

Q14: What measures could be undertaken to better integrate passenger and freight transport in research and in urban mobility planning?

Enforcement management include improper use of on-street parking facilities and on-street delivery spaces. Keeping up the availability of on-street delivery spaces improves both the conditions for good deliveries and the free flow of traffic in the inner city area.

One of the major challenges related to internet shopping is the potential replacement of bulk good deliveries to shops by individual deliveries to the end customer. Parking infrastructure, as a concentration point of activities and mobility nodes, can be used as pick-up point for deliveries from internet shops.

Q15: How can better co-ordination between urban and interurban transport and land use planning be achieved? What type of organisational structure could be appropriate?

It is crucial to integrate land use and urban planning with traffic and transport planning at an early stage. This includes planning parking provisions. Well balanced parking provision, not just covering individual



activities but based on integral activities in the specific local environment, can have major effects on land use related to every new infrastructure. This parking balance should be secured in local and regional land use planning procedures.

2.5 Towards safe and secure urban transport

Q16: What further actions should be undertaken to help cities and towns meet their road safety and personal security challenges in urban transport?

The parking industry today provides efficient and good quality infrastructure, where citizens feel comfortable: a good overview and spacious feeling, well lit, clean and safe. Clean and well maintained facilities are a very important indicator for safe feeling of the actual and potential users of those facilities where otherwise there may be reluctance to use them. Quality is a collective target for managers of the public area, public transport facilities and parking facilities.

Urban transport, safety and free flow of traffic (including public transport and cyclists) is further improved by avoiding illegal parking, either by providing good quality parking facilities, on street management and enforcement of illegal parked cars (this includes the need to address the general issue of cross border enforcement).

Q17: How can operators and citizens be better informed on the potential of advanced infrastructure management and vehicle technologies for safety?

EPA and its country member organisations are striving for quality by promoting quality standards and issuing quality awards for on-street and off-street car parks. Customer surveys show that the perception of security in parking facilities, both for vehicles and pedestrians is the most important factor for a quality car park. Environmental consciousness and sustainability of the construction and operation of car parks are also part of the quality criteria.

Q18: Should automatic radar devices adapted to the urban environment be developed and should their use be promoted?

EPA has no specific views on this question.

Q19: Is video surveillance a good tool for safety and security in urban transport?

The use of video surveillance for safety, security and customer support is already common practice in parking structures. The use of the images is subject to privacy protection regulations and under circumstances the material can be at disposal for the local police. As presence of video



surveillance is clearly announced and offenders could be recognised, this also reduces crime in the parking structures.

Video surveillance is also an increasingly effective tool for both parking and traffic enforcement, enabling streets to be managed effectively and facilities such as dedicated bus lanes, to work properly, as set out in our answer to question 12

Q20: Should all stakeholders work together in developing a new mobility culture in Europe? Based on the model of the European Road Safety Observatory, could a European Observatory on Urban Mobility be a useful initiative to support this cooperation?

Nothing can be more true than the need of working together of all stakeholders. Due to the nature of urban mobility and the parties involved in urban mobility and urban development, those aspects should be tied together in an observatory organisation. EPA would be keen to be involved in such an observatory and the parking industry can contribute to its work generally.

Financial resources

Q21: How could existing financial instruments such as structural and cohesion funds be better used in a coherent way to support integrated and sustainable urban transport?

EPA has previously made clear that parking should be seen as an integral part of urban mobility. Structural and cohesion funds can, and should, therefore, be used to promote parking facilities either individually as part of a clustered project with other functions. Typically the parking industry works well in a partnership fashion with the public authorities setting out policies and defining concessions where either public, private or mixed sector operators can invest and work effectively. Some work is needed in this area to ensure that such projects are undertaken in a transparent and legally coherent way.

Q22: How could economic instruments, in particular market-based instruments, support clean and energy efficient urban transport?

In our introduction we have set out how parking fees and charges can be used effectively (provided there is adequate enforcement) to prioritise access to city centres and reduce the impact of unnecessary traffic (such as 'searching' traffic). Similarly such fees can be used to encourage the use of electric and similar fuelled vehicles, by providing preferential rates.



Q23: How could targeted research activities help more in integrating urban constraints and urban traffic development?

The parking industry is a very fragmented industry, where on a European basis the top-ten operators cover only about 7% of the total business, almost 50% is covered by local public authority operators and the remaining part is covered by small private parties. As information and decision support only makes sense, when based on complete and up-to-date information, industry organisation is essential for proper data collection and information provision to policy makers and the mobility users. This can be encouraged by EPA and national parking organisations with support from the European Commission.

An example is the necessity to elaborate national parking studies that periodically review the global parking offer and the relative parking strategies within the context of a general urban mobility concept. These reviews can be elaborated every two or three years. The presence of the European Parking Association in 21 European countries offers important data collection opportunities.

Q24: Should towns and cities be encouraged to use urban charging? Is there a need for a general framework and/or guidance for urban charging? Should the revenues be earmarked to improve collective urban transport? Should external costs be internalised?

The basic goal of urban mobility planning should be to achieve liveable towns and cities with balanced economic health and accessibility. Towns and cities should organise strategies and policies to make more rationalised use of vehicles and public space. The way of achieving this is inevitably different for every city, depending on local circumstances. EPA does not, therefore, think there should be a general policy either to encourage or discourage the use of urban charging, although cities could be encouraged to consider urban charging, but not necessarily adopt or implement the concept. Urban charging is not a general applicable solution for every town or city and it certainly can not replace parking management – which is essential for every city.

Parking operations must also be recognized as a part of the public infrastructure, and many of the operations are the subject of public investment or generate public funds. According to UK legislation, any net surplus of parking fees or mincome from parking penalties can be allocated only to funding desirable improvements of parking facilities, public transport and highways. Public opinion surveys show that this is a politically attractive use of such income. At the same time, these surveys show that income from car use in city centres is the most acceptable way of funding better public transport.

Those types of legislation and guidance help to improve the acceptance of the measurements by the public as it helps to turn parking and access fees from taxation for general use to paid services, where the benefits



can be recognised clearly in terms of better accessibility and environment in the inner-cities.

Q25: What added value could, in the longer term, targeted European support for financing clean and energy efficient urban transport bring?

Revitalising inner cities into preferred and recommended areas for business, shopping, leisure and as a residential area for citizens, preferring the inner city lifestyle.

The European Parking Association will be happy to explain the potential of the parking industry to support the challenges addressed in the Green Paper. We are looking forward to further discussions with EC representatives in the public consultation and preparation of the Action Plan.

Cologne, 13th March 2008