



Bromsgrove Strategic Parking Review

Part Two: Car Park Management Review

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Executive Summary

This report covers Part Two of the Strategic Review of Car Parking in Bromsgrove. As part of this report, we have reviewed car park management arrangements with solutions identified to reduce the need for off-street parking enforcement including an outline of costs, together with operational and enforcement issues. We have also recommended time of day restrictions to address existing parking issues and assess enforcement requirements for identified parking management design options.

During our review, we have considered how Bromsgrove District Council's car parks are currently being managed. This is particularly timely given the town has undergone changes in land use and shopping behaviour over recent years which has impacted upon the popularity and functions of the town centre. Retail developments and regeneration projects in Bromsgrove have impacted on the demand for travel and the popularity of different parking areas, so there is a need to review whether the current parking provision is meeting the needs of the town, both at present and in the future. Currently, all car parks are within reasonable walking distance of most of the town centre, and that residents and visitors have a good range of existing provision to choose from.

The report includes a review of existing car park management strategies in Bromsgrove town centre compared to local authority areas with a similar demographic on social and economic needs. These have been assessed using factors such as existing conditions and enforcement methods. In comparing the effectiveness of different parking management approaches, lessons learned have been established from other areas, and the report determines how these approaches can be adopted by Bromsgrove to meet future needs.

Our proposed management approach recommends that parking enforcement should remain a sufficient deterrent to encourage motorists to comply with the regulations, however the primary purpose of penalty charge notices (PCNs) should only be to encourage compliance with parking restrictions in Bromsgrove, and not for the purposes of revenue generating. Rather, by further improving the parking offer, through offering cashless parking in all Bromsgrove town centre car parks for example, efficiencies can be found which in turn could increase revenue. The main efficiency would come with a potential reduction in the need for Civil Enforcement Officer (CEO) presence in Bromsgrove town centre, if for example the parking infrastructure at certain sites changed to embrace innovative enforcement methods. Also, use of new and existing technologies can enhance the user experience, in making parking easier and providing different ways to pay. There is also the potential to reduce back-office administration and allow for an improved offer relative to season tickets and contract parking.

An analysis of the impacts of future developments on Bromsgrove town centre car parking shows that there are several new residential developments which could influence traffic flow within Bromsgrove town centre, and parking provision, in particular car parks. The primary concern is the potential impact from the Land at Perryfields Road and Whitford Road developments. The larger site is following a phased development approach, and that due to the proximity to the town centre, it can be assumed that many residents will access the centre through sustainable transportation methods. However, the St John Street car park, in particular, could see an increase in traffic leading to the car park capacity being reached, as it is already the most utilised car park from the data analysed. The Recreation Road South car park could also see an increase in usage as it is one of the car parks nearest to new residents. Therefore, the impacts from both developments need to be considered by BDC as part of any future parking strategy for the town centre. Implementation of a zoning system in Bromsgrove to assist with identifying the geographical distribution of town centre developments could help to allocate associated parking demand to appropriate car park locations. When considered alongside a car park pricing strategy, the zoning system could also help to focus

more expensive parking towards the central areas of Bromsgrove, with less expensive parking options located around the edges of the town centre, with the aim of reducing the impact of vehicles penetrating the town centre.

Our review analysed typical CEO enforcement activity in the town centre over a typical weekday period, within a neutral month. We found that some car parks within the town centre were frequently visited by CEOs, with a considerable amount of time spent at the North Bromsgrove and Recreation Road South sites in particular, but very few PCNs were issued at either. This indicates that, whilst the threat of a PCN acts as a deterrent in Bromsgrove town centre, compliance with parking regulations is currently high, and therefore, alternative approaches could be considered to reduce the level of CEO presence and resource required within the town centre. In analysing car park user payment patterns, we have ascertained that car parking in Bromsgrove town centre is suitable for exploring alternative car parking management arrangements. Currently, most payments for parking are made by credit/debit card at the payment machines, however, cash payment remains high across all sites, in particular School Road car park where around 45% of all transactions were cash transactions.

There is a considerable economic case for car parking within Bromsgrove town centre going cashless, as it would reduce maintenance costs for the operation of Pay and Display machines as well as the cost of collecting the cash from the machines. App/online payments are currently very low, so it is further recommended that more information/signage is provided to make users aware that they do not have to necessarily use the pay and display machines to pay for car parking.

As part of our review, a SWOT (*Strengths – Weaknesses – Opportunities – Threats*) analysis of potential car parking management arrangements was conducted. Adopting a “business as usual” approach is not optimal as the only benefits appear to be that the service provider and service users are familiar operating and using the service as it is at present. However, this is far outweighed by factors such as maintaining systems and infrastructure that support cash payment, and security concerns such as protecting revenue in the payment machines. Installing an ANPR system across Bromsgrove town centre car parks offers significant benefits in terms of security, efficiency, and revenue management. From the SWOT analysis, ANPR is deemed the most advantageous method to install at off-street town centre public car parks due to the strengths and weaknesses outweighing the strengths and weaknesses of a barrier system and “business as usual.”

There is a legal framework for BDC to follow to implement fixed ANPR cameras in off-street public car parks in Bromsgrove, if this recommendation is to be pursued. However, before using ANPR cameras in off-street public car parks (under both civil and criminalised regimes), BDC must satisfy themselves that they have the power to install and use the cameras as intended. This is a complex area of the law. It is critical that BDC establish the necessary power to use cameras for parking enforcement, otherwise any enforcement action taken on the basis of evidence generated may be invalid. We advise that BDC involve their legal advisers on this crucial point from the outset.

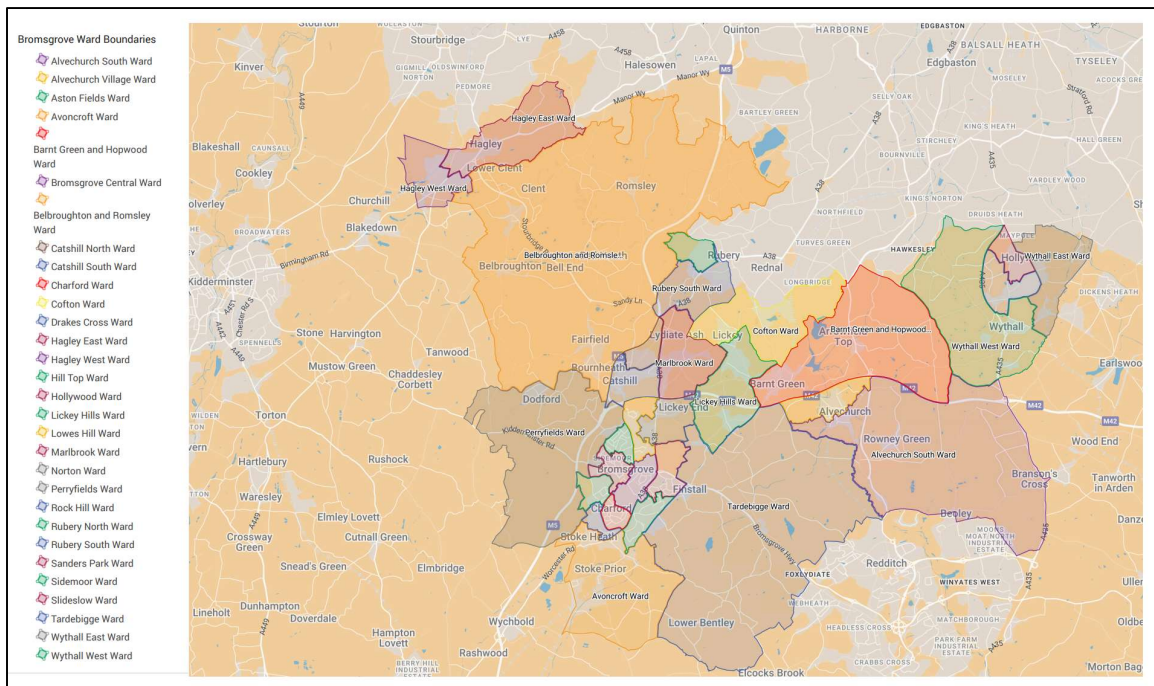
There are cost, maintenance, and potential privacy concerns to overcome, and to maximise the benefits and mitigate the risks, BDC will need to undertake careful planning, compliance with regulations, and robust cybersecurity measures. Integrating ANPR with the existing online payment/smart parking solution could further enhance the user experience and operational efficiency. Furthermore, installation of ANPR offers significant opportunities for BDC to receive detailed data on parking habits across their car parks, helping to make informed decisions on tariffs, redevelopment, and improvements to car parks. Our Management Review has taken revenue generation, costs of installing an ANPR system and the return on investment into account in evaluating the preferred option. Should the current management arrangement be enhanced with ANPR technology in Bromsgrove town centre car parks, the CEO resource could be freed up to patrol other areas of the district with a focus on on-street enforcement.

1. Introduction

The Brief

- 1.1 Waterman Infrastructure & Environment ('Waterman') have been commissioned by Bromsgrove District Council to undertake a Car Park Management Review of Bromsgrove Town Centre and the surrounding areas.
- 1.2 As part of this review, we have considered existing car park management arrangements with solutions identified to reduce the need for off-street parking enforcement, including an outline of costs, together with operational and enforcement issues. We have also recommended time of day restrictions to address existing parking issues and assess enforcement requirements for identified parking management design options.
- 1.3 The district boundary and the respective wards within Bromsgrove are illustrated in **Figure 1**.

Figure 1: Bromsgrove Wards



Background

- 1.4 This Management Review considers how Bromsgrove District Council's car parks are being managed. This is particularly timely given the town has undergone changes in land use and shopping behaviour over recent years which has impacted upon the popularity and functions of the town centre.
- 1.5 Retail developments and regeneration projects in Bromsgrove have impacted on the demand for travel and the popularity of different parking areas, so there is a need to review whether the current parking provision is meeting the needs of the town, both at present and in the future.
- 1.6 This study includes a review of existing car park management strategies in Bromsgrove town centre and local wards compared to local authority areas with a similar demographic on social and economic needs. These have been assessed using factors such as existing conditions and enforcement methods.

- 1.7 Additionally, the report provides solutions to address car parking management, reducing the need for off street parking enforcement at certain locations allowing wardens to cover greater distances outside of the town centre. This is also discussed in the On-Street Parking Enforcement Review report.
- 1.8 Further in this Management Review, the possibility of Automatic Number Plate Recognition (ANPR) camera use is explored, outlining the costs, as well as operational and enforcement issues.

Report Format

- 1.9 The structure of this report is as follows:
- **Section 2** reviews other local authorities car park management strategies.
 - **Section 3** presents the existing parking provision.
 - **Section 4** reviews proposed developments across the Bromsgrove District Council Boundary.
 - **Section 5** analyses the current payment trends across the car parks managed by Bromsgrove District Council.
 - **Section 6** conducts a SWOT analysis of the preferred management method.
 - **Section 7** considers the alternative parking strategy measures and presents the recommended strategy; and
 - **Section 8** provides a summary of the report findings.

2. Car Park Management Approach Comparisons

Introduction

- 2.1 The purpose of this section is to compare the effectiveness of different parking management approaches from local authority areas, to establish any lessons learned from other areas, and to determine how these approaches can be adopted by Bromsgrove to meet future needs.
- 2.2 Bromsgrove is a traditional market town located in Worcestershire, with a population of approximately 99,200 (Census, 2021). Bromsgrove borders the built-up area of Birmingham to the north. Other towns and villages in the district include Alvechurch, Aston Fields, Belbroughton, Catshill, Clent, Hagley, Rubery, Stoke Prior and Wythall.
- 2.3 For Bromsgrove District Council, currently off-street car parking enforcement is contracted to Wychavon District Council (WDC) to administer. They have a finite resource of 5.5 Full-Time Equivalent (FTE) Civil Enforcement Officers (CEOs) spread across the district and CEOs are based out of Bromsgrove town centre.
- 2.4 From analysis of the beat patterns of the Civil Enforcement Officers, which was covered in the Strategic Review, the most common areas being enforced are within Bromsgrove town centre, notably public car parks within the core town centre area.
- 2.5 A review has been undertaken of the car parking management arrangements of the following three local authorities who have recently either completed a 5-year plan for car parking, renegotiated their parking enforcement contracts, or have recently updated their car parking strategies to meet parking needs both for the present and in the future:
- Bracknell Forest
 - Oldham
 - Cheshire West and Chester
- 2.6 The three areas were chosen as comparators, as they have similar values to Bromsgrove in terms of demographics, as well as social and economic needs. These have been assessed using factors such as existing conditions and enforcement methods.

Bracknell Forest

- 2.7 The Enforcement and Parking Management Strategy for Bracknell Forest Council between 2019 – 2024 has been reviewed. Lessons learned from Bracknell's approach, and how it could be applied in Bromsgrove's approach, are as follows:
- In terms of enforcement and management, enforcement should remain an important part of delivering a parking strategy for Bromsgrove, as a sufficient deterrent to encourage motorists to comply with the regulations.
 - Parking measures should be used to support continued economic growth and increasing dwell times, manage traffic and secure enough revenue to cover the cost of car parking. However, the primary purpose of penalty charge notices should be to encourage 100% compliance with parking restrictions, and as such raising revenue should not be an objective of parking enforcement, and therefore, going forward, targets should not be set in respect of numbers of PCNs issued or revenue collected from PCNs.
 - There is no doubt that contract efficiencies could be made via a redefinition of staffing roles and responsibilities whereby existing roles are combined; this also provides a great resilience for redeployment of staff.

- The traditional approach has been to ensure a physical presence of staff, but modern technological capabilities and infrastructure allow for a reduction in workforce with the move to central control and automation as is the industry norm. There is however a balance to be struck as a move such as this is likely to have a perceived reduction in customer service.
- Use a Variable Messaging System (VMS), located at key entry points into Bromsgrove town centre; this would provide information to motorists about parking availability in the main town centre car parks. VMS data counters can record all entries and exits to estimate occupancy. This can be used to direct and control parking (at busy times and for large events) and reduce congestion at key times.
- Offer cashless parking in all Bromsgrove's car parks. By further improving the offer, Bracknell found efficiencies which in turn could increase revenue. The main efficiency would come with a potential reduction in civil enforcement officer staffing if for example the parking infrastructure at certain sites changed from pay and display to ANPR.
- Use new and existing technologies to enhance the user experience, in making parking easier and providing different ways to pay. Digital technology can be used to better inform motorists of the choices available to them and parking availability information.
- Consider the development of an online portal system, which will have the potential to reduce back-office administration and allow for an improved offer relative to season tickets and contract parking. The intention is that this web-based system could enable the user to make an application for either a single season ticket on an individual basis or for several season tickets on behalf of a company. There is the potential that this system could also allow for a complete cashless parking solution whereby a bank card is registered and debited each time a registered vehicle leaves the car park.

Oldham

2.8 Oldham Town Centre is situated in a similar location to Bromsgrove, both being in close proximity to a major city. Population sizes are also similar with both their town centres and surrounding wards having a population of approximately 100,000. Lessons learned from Oldham's approach, and how it could be applied in Bromsgrove's approach, are as follows:

- Implement of a zoning system to assist with identifying the geographical distribution of town centre developments and help to allocate associated parking demand to appropriate car park locations.
- The aim of this zonal system would be to create a more evenly distributed provision of car parking spaces around the town centre. When combined with a complementary routeing and signage strategy, this will allow drivers to be guided quickly to an appropriate car park depending on the direction from which they approach the town centre. This should reduce incidences of traffic circulating the town centre searching for a car parking space.
- When considered alongside a car park pricing strategy, a zoning system could also help to focus more expensive parking towards the central areas, with less expensive parking options located around the edges of the town centre, with the aim of reducing the impact of vehicles penetrating the town centre.

Cheshire West & Chester

- 2.9 Cheshire West and Chester Council (CWCC) operates both on and off-street parking within its boundary. It had historically operated its off-street car park using pay and display except for one car park in Chester, which had pay and display on some floors and pay on exit on the remainder.
- 2.10 Due to issues with the pay on exit system, CWCC considered options for its replacement and the potential to extend the system to other car parks in Chester. Lessons learned from CWCC's approach, and how it could be applied in Bromsgrove's approach, are as follows:
- To install a Pay on Foot and ANPR (licence plate recognition) system at designated car parks with functionality including recognition of season ticket/pre-payment card holders with barriers raising automatically, resident Blue Badge Holders parking free for up to 4 hours using a chip system applied to the badge which the pay on foot system recognises.
 - Implement a web-based application that allows businesses to pay towards or for its customers' parking.
 - A flexible maintenance contract, supported by front line maintenance from Bromsgrove officers if required. Since installation, CWCC found that revenue increased significantly with the capital costs being recouped within 12 months. The system could also help with Bromsgrove's' parking enforcement operations, allowing WDC to focus more resources on enforcing on-street parking contraventions to keep traffic moving in the district.

Summary

- 2.11 In this section we have compared the effectiveness of different parking management approaches, to establish any lessons learned from other areas, and to determine how these approaches can be adopted by Bromsgrove to meet future needs. In areas that have similar values to Bromsgrove in terms of demographics, as well as social and economic needs, existing conditions and enforcement methods were reviewed.
- 2.12 It was found that parking enforcement should remain a sufficient deterrent to encourage motorists to comply with the regulations, however the primary purpose of penalty charge notices should only be to encourage compliance with parking restrictions, and not to raise revenue; thereby targets should not be set in respect of numbers of PCNs issued or revenue collected.
- 2.13 Contract efficiencies can be made via a redefinition of staffing roles and responsibilities whereby existing roles are combined; this also provides a great resilience for redeployment of staff. Modern technological capabilities and infrastructure allow for a reduction in workforce with the move to central control and automation as is the industry norm. There is however a balance to be struck as a move such as this is likely to have a perceived reduction in customer service.
- 2.14 At key entry points into Bromsgrove town centre, use a Variable Messaging System (VMS) could provide information to motorists about parking availability in the main town centre car parks. This can be used to direct and control parking (at busy times and for large events) and reduce congestion at key times.
- 2.15 By further improving the parking offer through offering cashless parking in all Bromsgrove's car parks, efficiencies could be found which in turn could increase revenue. The main efficiency would come with a potential reduction in civil enforcement officer staffing if for example the parking infrastructure at certain sites changed from pay and display to ANPR. Use new and existing technologies to enhance the user experience, in making parking easier and providing different ways to pay.

- 2.16 More prevalent utilisation of digital technology can be used to better inform motorists of the choices available to them and parking availability information. Also, to consider the development of an online portal system, which will have the potential to reduce back-office administration and allow for an improved offer relative to season tickets and contract parking.
- 2.17 Implement of a zoning system in Bromsgrove to assist with identifying the geographical distribution of town centre developments and help to allocate associated parking demand to appropriate car park locations. When considered alongside a car park pricing strategy, the zoning system could also help to focus more expensive parking towards the central areas, with less expensive parking options located around the edges of the town centre, with the aim of reducing the impact of vehicles penetrating the town centre.

3. Review of Existing Car Parking Provision

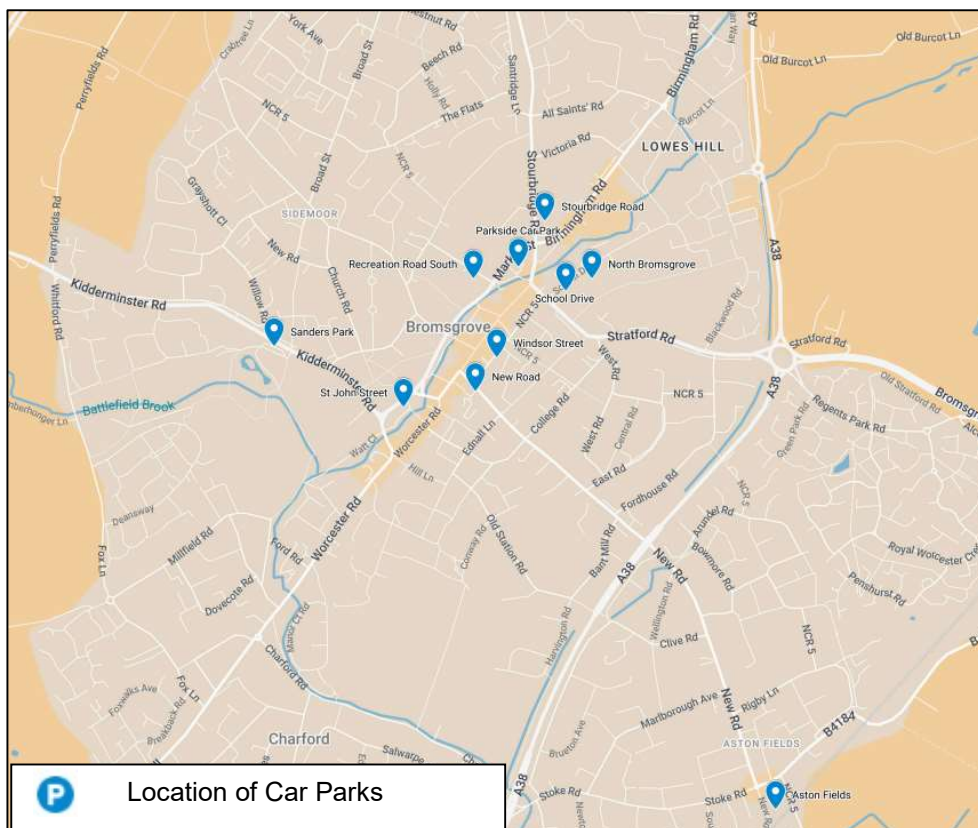
Introduction

- 3.1 In this section we have undertaken a review of existing off-street car parking provision within Bromsgrove town centre, including the spatial distribution of off-street car parks.
- 3.2 Our review has also looked at typical CEO enforcement activity over a typical weekday period, within a neutral month. This was to ascertain a baseline for typical enforcement activity within the town centre.
- 3.3 We have analysed the number of visits to each location and compared this with the number of PCNs issued. We have also analysed the average time spent monitoring each car park by CEOs, and where particular locations attract the highest resources. We have given the approximate total time spent monitoring by enforcement officers over the 7-day period and an average time spent in each car park.
- 3.4 To help predict future trends and management propositions, we have provided various reasons users park at each car park within the town centre. This is in order to make the case for change for an enforcement approach at these locations.

Off-Street Car Parking Enforcement

- 3.5 Bromsgrove town centre and surrounding wards have 10 car parks. **Figure 2** below shows the locations of the Off-Street car parks in Bromsgrove town centre.

Figure 2: Bromsgrove Parking Locations Enforced by Bromsgrove District Council



3.6 **Table 1** overleaf shows the off-street areas featured in the **Figure 2**, monitored by enforcement officers between 22/04/24 – 28/04/24. **Figure 3** below shows the number of enforcement notices issued between 22/04/24 – 28/04/24 in Bromsgrove Town Centre.

Figure 3: Bromsgrove Town Centre Enforcement Notices Issued 22/04/24 – 28/04/24

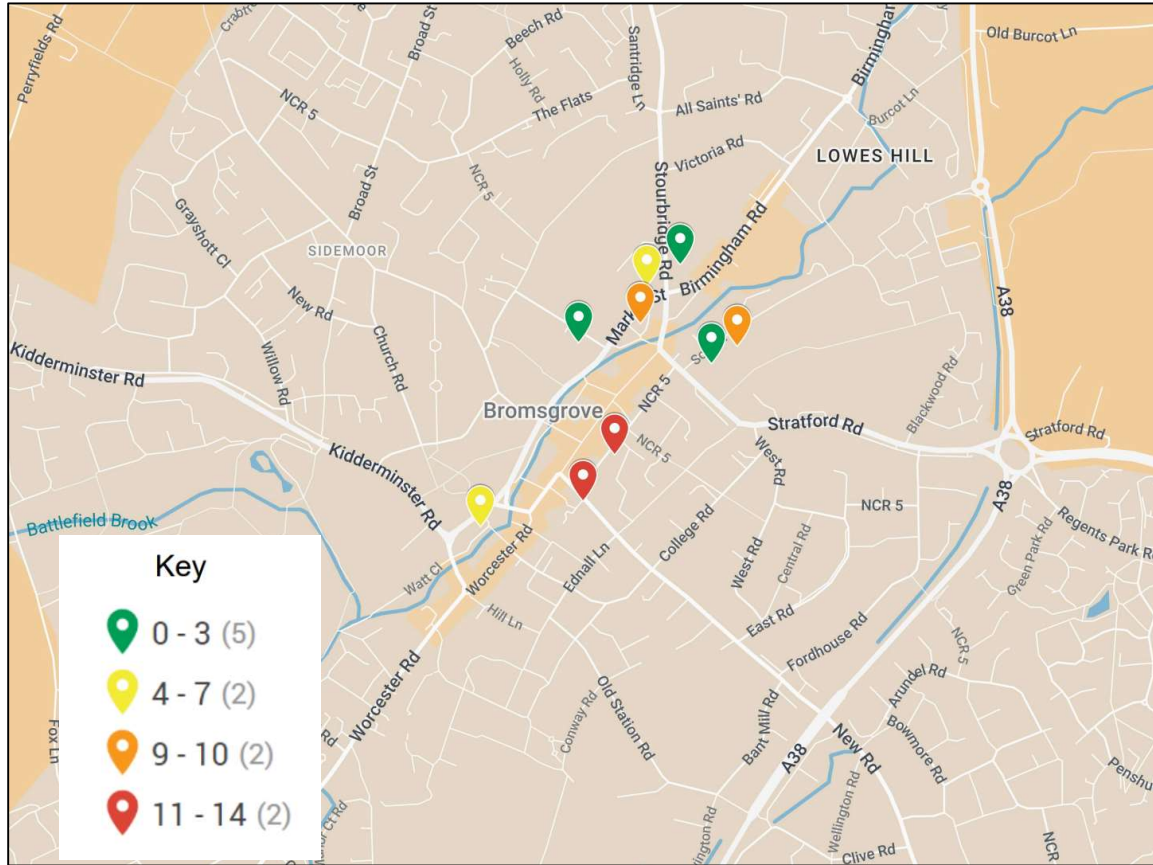


Table 1: Car Park Enforcement 22/04/24 – 28/04/24

Location	Number of Visits	Observed Vehicle Count	Notices Issued	Average Time	Total Time
Alvechurch Tanyard Lane Car Park	5	3	3	00:03:59	00:19:57
Aston Fields Car Park	9	4	1	00:05:20	00:47:59
New Road Car Park	18	16	11	00:08:08	02:26:15
North Bromsgrove Car Park	15	26	10	00:12:03	03:00:45
Parkside Car Park	38	22	9	00:06:14	03:56:50

Location	Number of Visits	Observed Vehicle Count	Notices Issued	Average Time	Total Time
Parkside Offices Car Park	7	4	4	00:05:07	00:35:51
Recreation Road South Car Park	73	11	3	00:06:39	08:05:39
School Drive Car Park	27	8	3	00:08:25	03:47:10
St John Street Car Park	19	19	7	00:09:16	02:55:58
Stourbridge Road Car Park	5	0	0	00:05:21	00:26:43
Windsor Street Car Park	37	42	14	00:07:19	04:30:54

- 3.7 As can be seen in **Table 1** above, 'Recreation Road South' car park is the most visited car park by enforcement officers with 73 visits over the 7-day period, this comes to approximately 10 visits per day. Despite the high number of visits from enforcement officers, and the fact the car park is the busiest in Bromsgrove town centre and surrounding wards, there are a low number of notices issued with just 3.
- 3.8 The car parks with the highest notices issued are, 'Windsor Street Car Park,' 'New Road Car Park' and 'North Road Car Park' with 14, 11 and 10 Notices issued by enforcement officers. 'Stourbridge Road Car Park' and 'Aston Fields Car Park' have the lowest number of Notices Issued with 0 and 1. A number of car parks have 3 Notices issued including 'Recreation Road South'.
- 3.9 The car park with the highest average time spent monitoring by enforcement officers is 'North Bromsgrove Car Park' with an average time of 00:12:03 each visit. Therefore, 'North Bromsgrove Car Park' is the car park where enforcement officers spend the most time in a week with just over 3 hours being spent there.
- 3.10 To conclude, the approximate total time spent monitoring by enforcement officers over the 7-day period is 30:54:01, with an average time spent in each car park of 00:07:05.

Car Park User Preferences

- 3.11 With 9 car parks within reasonable walking distance of most of the town centre, Bromsgrove residents and visitors have a range of car parks to choose from.
- 3.12 To help predict future trends and management propositions **Table 2** below shows a number of reasons users park at each car park within the centre.

Table 2: Benefits of Parking in each Car Park

Car Park	Possible Reasons of Parking here	Possible Reasons to Avoid
New Road Car Park	Easy walking distance to High Street	Majority of Car Park on a slope
North Bromsgrove Car Park	Main Car Park for the Leisure Centre	
Parkside Car Park	Easy walking distance to High Street	
Parkside Offices Car Park	Facilities nearby such as Churchfields Surgery and Bromsgrove Library	Further out from town centre
Recreation Road South Car Park	Proximity to Asda Superstore. Large site and easy to navigate, easy walking distance to High Street	
School Drive Car Park	Proximity to Leisure Centre	Likely to park in 'North Bromsgrove Car Park' for Leisure Centre
St John Street Car Park	Proximity to Waitrose Car Park, within reasonable walking distance to High Street	Reputation of being busy
Stourbridge Road Car Park	Possible Aldi Overflow	More likely to park in Aldi Car Park for Aldi, Condition is not as appealing as nearby alternatives. Parking available over the road
Windsor Street Car Park	Easy walking distance to High Street	Reputation of being busy

- 3.13 As seen in the figures and tables above, many car parks within the town centre share similar reasons to park there, thus the choice of usage comes down to user preferences (including start/end destination) for visitors to Bromsgrove town centre. The car parks are well used, compliance with regulations appears to be high, and therefore, alternative approaches could be considered to reduce CEO resource at these locations.
- 3.14 'Stourbridge Road Car Park' and 'School Drive Car Park' lack direct incentives to park and would therefore be classed as back-up / overflow car parks only.

Summary

- 3.1 In this section we have undertaken a review of existing off-street car parking provision within Bromsgrove town centre, including the spatial distribution of off-street car parks. We have found that all car parks are within reasonable walking distance of most of the town centre, and that residents and visitors have a good range of existing provision to choose from.

- 3.2 Our review has also analysed typical CEO enforcement activity in the town centre over a typical weekday period, within a neutral month. We found that some car parks within the town centre were frequently visited by CEOs, with a considerable amount of time spent at the Recreation Road South site in particular, but very few PCNs were issued.
- 3.3 This indicates that, whilst the threat of a PCN acts as a deterrent, compliance with parking regulations is currently high, and therefore, alternative approaches could be considered to reduce the level of CEO presence and resource required within the town centre.
- 3.4 We have provided various reasons users park at each car park within the town centre. Many car parks within the town centre share similar reasons to park there, thus ultimately coming down to user preferences (including start/end destination). They are well used, compliance with regulations appears to be high, and therefore, alternative approaches could be considered to reduce CEO resource at these locations.

4. Meeting Future Car Parking Needs

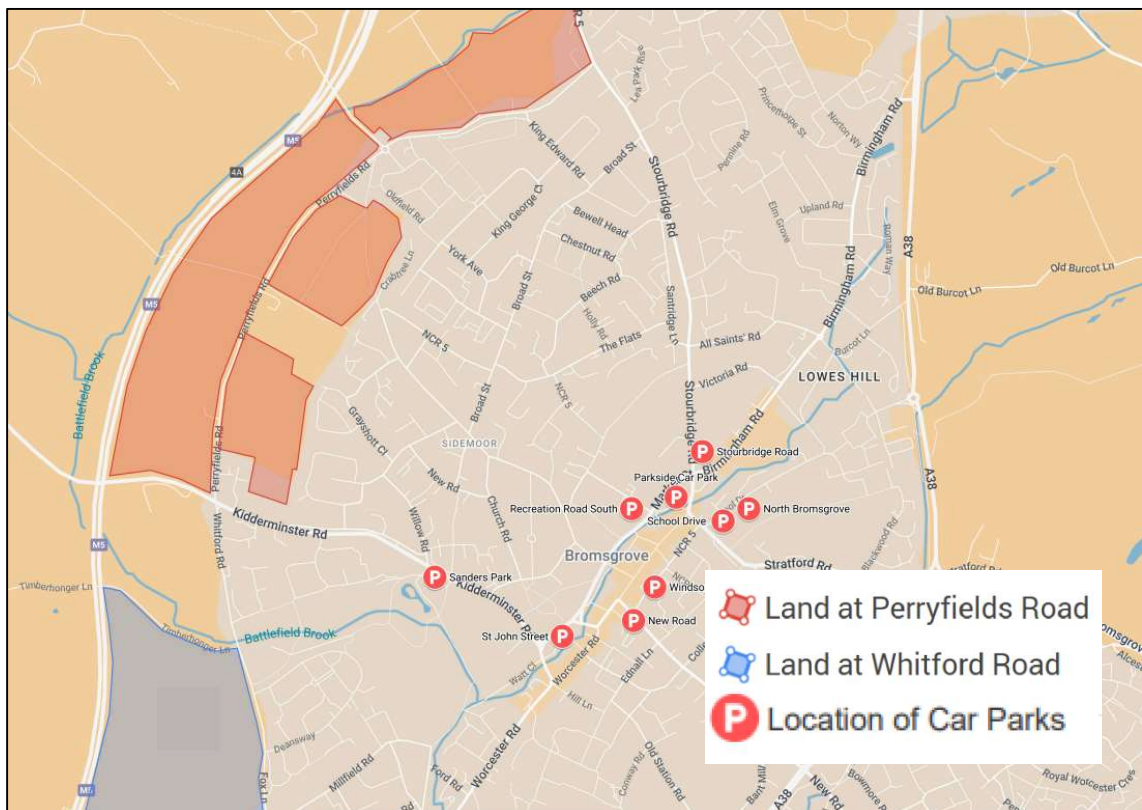
Introduction

- 4.1 As part of our Management Review, we have investigated whether Bromsgrove town centre car parking provision is fit to meet the future needs of residents and visitors, and whether additional provision is required.
- 4.2 In this section, we have reviewed the impacts of future developments as outlined in the adopted Bromsgrove Local Development Plan 2011-2030. These future developments are identified as “Committed Developments” in the LDP and therefore, BDC has confidence in these coming forward within the plan period.

Impacts of Committed Developments

- 4.3 From analysing the spatial distribution of committed developments, we have identified that there are several new residential developments which could have an effect on traffic flow within Bromsgrove town centre and parking provision in particular car parks.
- 4.4 Primarily amongst these is the impacts derived from the following developments as found in **Figure 4** below.

Figure 4: Committed Developments in vicinity of Bromsgrove Town Centre



- 4.5 As can be seen in the figure above, there are two developments on the western side of Bromsgrove Town Centre which could have an impact on future provision:
- Land at Perryfields Road development - phased development for up to 1,300 dwellings
 - Whitford Road - up to 490 dwellings

4.6 The development of these sites would naturally increase parking occupancy within the town centre. Due to the proximity to the town centre, it can be assumed that many residents would access the centre through sustainable transportation methods, however despite this, the St John Street car park could see an increase in traffic leading to the car park capacity being reached, moreover as it is already the most utilised car park across the 3 days analysed.

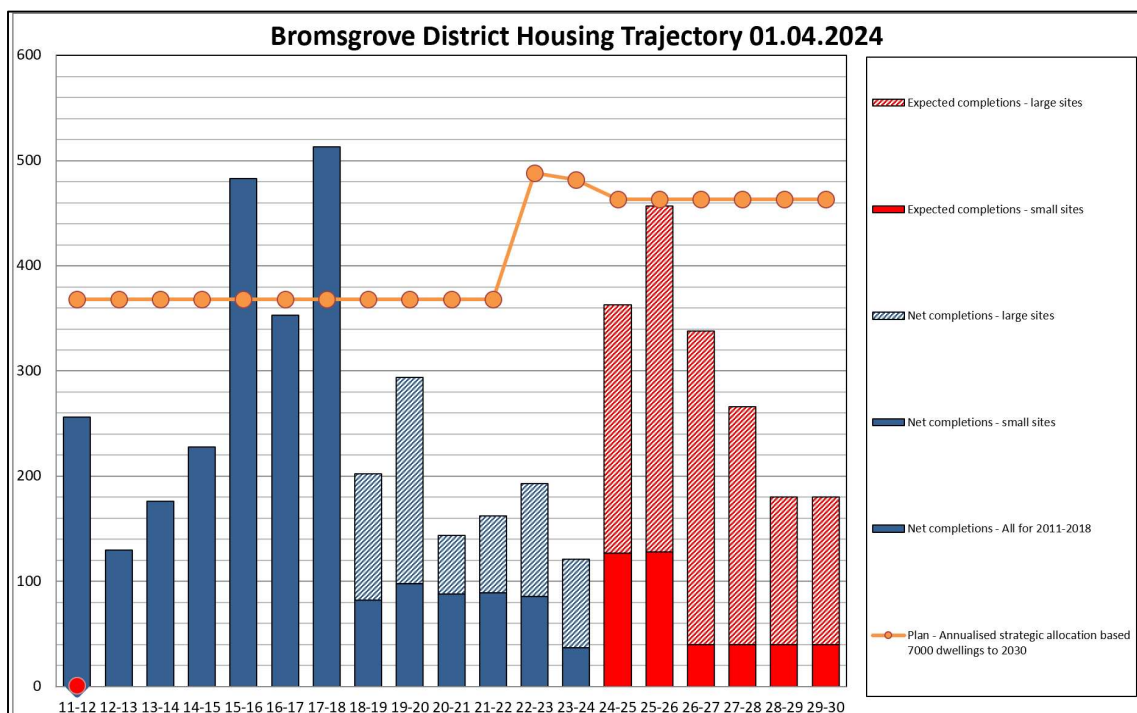
4.7 **Table 3** shows the previous 3 years of dwellings delivered compared to the requirements:

Table 3: Previous Three Years Housing Delivery

Year	Completions	Plan requirement
2020 / 21	144	368
2021 / 22	162	368
2022 / 23	193	368
Total	499	1104

4.8 The total delivery of houses is 499. The total planned requirements were 1,104. Therefore, 45% of proposed houses have been built within the district. This indicates that development is not currently coming forward as planned, although impacts need to be considered as part of an overall parking strategy. This is further portrayed in **Figure 5** below:

Figure 5: Bromsgrove District Housing Trajectory



Summary

- 4.9 As part of our Management Review, we have reviewed the impacts of future developments as outlined in the adopted Bromsgrove Local Development Plan 2011-2030.
- 4.10 We have identified that there are several new residential developments which could influence traffic flow within Bromsgrove town centre and parking provision in particular car parks. The primary concern is the potential impact from the Land at Perryfields Road and Whitford Road developments.
- 4.11 The development quantum for both sites combined is nearly 2,000 homes, and these will naturally increase parking occupancy within the town centre.
- 4.12 The larger site is following a phased development approach, and that due to the proximity to the town centre, it can be assumed that many residents will access the centre through sustainable transportation methods.
- 4.13 However, the St John Street car park in particular could see an increase in traffic leading to the car park capacity being reached, as it is already the most utilised car park across the 3 days analysed. The Recreation Road South car park could also see an increase in usage as it is one of the car parks nearest to new residents.
- 4.14 Therefore, the impacts from both developments need to be considered by BDC as part of any future parking strategies for the town centre.

5. Analysis of Existing Payment Patterns

Introduction

- 5.1 To ascertain the suitability of exploring alternative management arrangements for Bromsgrove town centre car parks, we have analysed user payment behaviour to understand payment patterns.
- 5.2 In this section, we analyse the paid council operated car parks to ascertain the proportion of transactions that are made by cash or card at a pay and display machine, or by online payments which BDC have recently commenced operating.

Payment Patterns

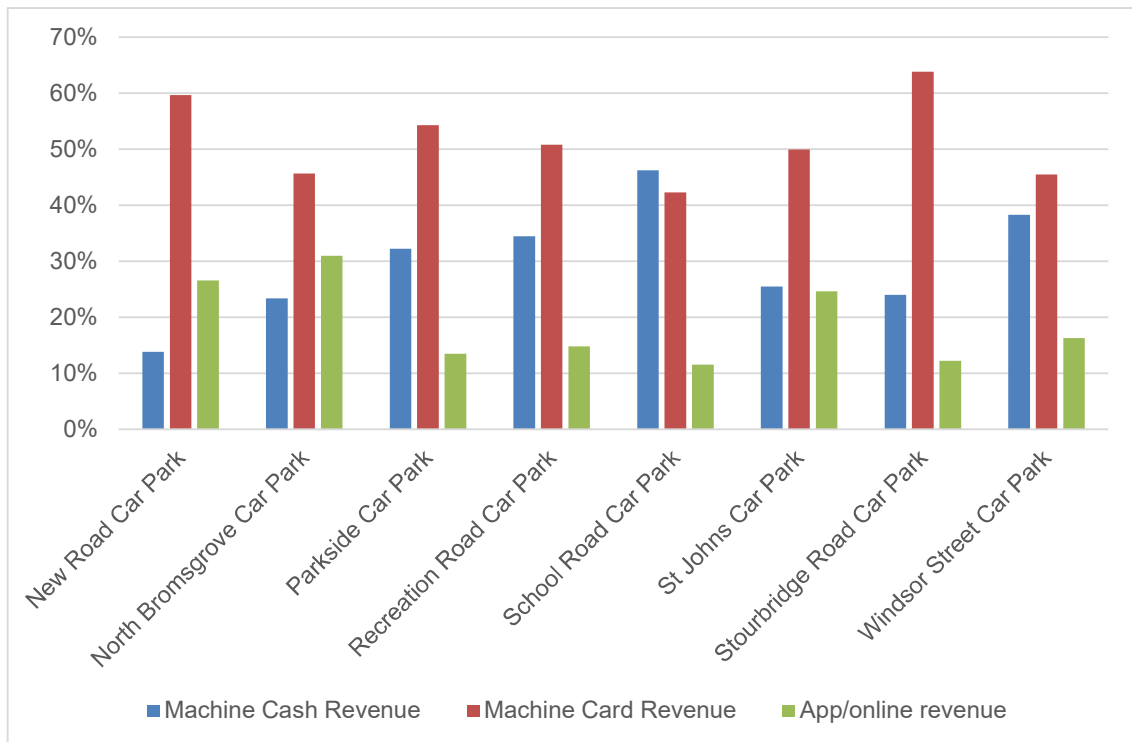
- 5.3 The analysis was conducted between the dates 22/04/2024 and 28/04/2024. The dates were chosen due to it being within a neutral month, with no school holidays or public holidays to impact the findings. This was so a realistic representation could be made of the payment methods that are currently used in a typical week.
- 5.4 Overall, the split of transactions for the chosen week can be seen below in **Table 4**.

Table 4: Percentage of Revenue by Method

Payment Method	Percentage of Revenue
Cash at Machine	31%
Card at Machine	50%
App/Online Payments	19%

- 5.5 From the data analysed, around 50% of users choose to pay with a debit/credit card when paying for parking in car parks across Bromsgrove town centre. Significantly, 31% of users still choose to pay by cash, with App/Online payments only being 19%.
- 5.6 A further, in-depth review of the current payments received from the specific car parks around Bromsgrove is provided in **Figure 7**.

Figure 5: Payment Type by Car Park



- 5.7 **Figure 7** shows that most payments during a typical week in a neutral month were made by paying by credit/debit card at payment machines. However, cash payment remains high across all sites, in particular School Road Car Park where around 45% of all transactions were cash transactions. This is the most popular method of payment at this site.
- 5.8 New Road Car Park which has the lowest proportion of cash transactions at 13% and one of the highest card transaction proportions at 59%.
- 5.9 A common trend is that app/online payments are below 35% on all car parks with the lowest being 11% at School Road. This is most likely due to people not being aware that they are able to pay by app/online.

Summary

- 5.10 In this section, through analysing car park user payment patterns, we have ascertained that car parking in Bromsgrove town centre is suitable for exploring alternative car parking management arrangements.
- 5.11 Currently, most payments for parking are made by credit/debit card at the payment machines, however, cash payment remains high across all sites, in particular School Road car park where around 45% of all transactions were cash transactions.
- 5.12 There is a considerable economic case for car parking within Bromsgrove town centre going cashless, as it would reduce maintenance costs for the operation of Pay and Display machines as well as the cost of collecting the cash from the machines.
- 5.13 Operating a cashless system across all car parks would allow for revenue to be protected as well as reducing operating costs. To implement this however, users' habits of choosing to pay with cash would need to change. App/online payments are currently very low, so it is further recommended that more information/signage is provided to make users aware that they do not have to necessarily use the pay and display machines to pay for car parking.

6. Car Park Management Options Appraisal

Introduction

- 6.1 Having established that Bromsgrove town centre car parks are suitable for exploring alternative car parking management arrangements, in this section we explore options for alternative arrangements through a SWOT (Strengths, Weaknesses, Opportunities, and Threats) Analysis
- 6.2 This has been conducted for Option 1 – Implementing an ANPR system, and Option 2 – Installation of Ticketed Barriers, as well as a “Do Nothing” (Business as Usual) option.
- 6.3 This has been conducted to formulate an options appraisal through leveraging strengths, addressing weaknesses, exploiting opportunities, and mitigating threats:

Do Nothing (Business as Usual)

<p>Strengths</p> <ul style="list-style-type: none"> 1. Organisational Familiarity 2. Familiarity for Users 	<p>Weaknesses</p> <ul style="list-style-type: none"> 1. Maintenance and Technical Issues 2. Dependence on Existing Systems 3. Technological Obsolescence 4. Revenue Protection Risks
<p>Opportunities</p> <ul style="list-style-type: none"> 1. Continuity of service 	<p>Threats</p> <ul style="list-style-type: none"> 1. Regulatory Changes 2. Technological Obsolescence 3. Revenue Protection Risks

The SWOT analysis above shows that the Strengths in adopting a “business as usual” approach would be organisational familiarity with operating the service as it is at present. This approach would also give existing users familiarity, in that the approach would not be changed. This may best support the users who currently pay by cash.

Opportunities derived from adopting a “business as usual” approach come from the continuity of service it would provide for the existing operation.

Weaknesses and Threats concern an ongoing requirement to maintain the systems and infrastructure that support cash payment. There would be a dependence on maintaining existing systems and infrastructure which may become obsolete with advances in payment methods and parts to maintain them. Protecting revenue in the payment machines is also an ongoing weakness and threat in that they are currently, or could be in the future, a target for criminal activity, given that they are currently a source of cash.

Option 1: Implementing an ANPR system

Introduction

- 6.4 An automatic number plate recognition (ANPR) system captures the vehicle registration number of vehicles when they drive in and out of a car park. Rather than buy a ticket when the customer arrives, they will need to pay before they exit the car park, so there will be no ticket to display. A receipt can be printed from the payment machines.
- 6.5 When paying at the machines the customer will need to put in their registration number into the machine, and the machine will calculate how long they have been in the car park. They allow for credit/debit card payment (including contactless).
- 6.6 A system is typically set to allow for vehicles to pick up/drop off or find a space. If the customer spends longer than the limit, they will need to pay for parking. If they do not pay for parking, they can get issued with a PCN.

<p>Strengths</p> <ol style="list-style-type: none"> 1. Improved Security 2. Efficiency in Parking Management 3. Enhanced Revenue Management 4. Data Collection 5. Convenience for Users 	<p>Weaknesses</p> <ol style="list-style-type: none"> 1. High Initial Cost 2. Maintenance and Technical Issues 3. Privacy Concerns 4. Dependence on Technology
<p>Opportunities</p> <ol style="list-style-type: none"> 1. Integration with Smart Parking Solutions 2. Enhanced Customer Service 3. Futureproofing 	<p>Threats</p> <ol style="list-style-type: none"> 1. Regulatory Changes 2. Public Resistance 3. Technological Obsolescence 4. Cybersecurity Risks

In terms of implementing an ANPR system for car parks in Bromsgrove, the Strengths are in improved security - Automatic Number Plate Recognition (ANPR) systems can enhance the security of a car park by identifying and recording all vehicles entering and exiting. This helps in deterring criminal activities such as theft and vandalism. The strengths also provide efficiency in parking management; ANPR systems streamline parking operations by automating entry and exit processes. This will reduce the need for manual checks and can speed up the flow of traffic, reducing congestion at peak times. Also, enhanced revenue management can be derived from an ANPR system; it could be integrated with payment systems to enforce parking fees accurately, ensuring all users are charged correctly. This minimises revenue loss due to unpaid parking. Data collection is also a strength, as the systems can provide valuable data on parking usage patterns, helping to optimise space utilisation and inform future improvements. Finally, it is a convenient option, in that users could benefit from a smoother and quicker parking experience as ANPR reduces the need for physical tickets and barriers.

In terms of Weaknesses, there is a high initial cost. The installation and setup of ANPR systems can be expensive, requiring significant upfront investment in hardware, software, and infrastructure. ANPR systems require regular maintenance and updates to ensure accuracy and functionality.

Technical failures could lead to operational disruptions. The use of ANPR involves the collection and storage of vehicle data, which can raise privacy issues among users. Compliance with data protection regulations like GDPR will be essential. Also, over-reliance on ANPR technology can be problematic if there are system failures or power outages, potentially causing operational bottlenecks.

Opportunities derived from installing an ANPR system allow for integration with smart parking solutions; these systems can be integrated with other smart parking technologies, such as real-time space availability indicators, mobile app payments, and reservation systems, enhancing the overall user experience. Enhanced customer service can also be derived, with data from ANPR able to be used to offer personalised services, such as loyalty programs for frequent users or targeted promotions. Moreso, implementing ANPR systems position BDC to adapt to future developments in automated and connected vehicle technologies.

In terms of Threats, regulatory changes such as potential future changes in data protection and privacy regulations could impose additional compliance requirements or restrict the use of ANPR technology. Users may also have concerns about privacy and data security, leading to resistance or reduced patronage if they feel their personal information is not adequately protected. Rapid advancements in technology could render current ANPR systems obsolete, necessitating further investment in upgrades or replacements. Also, ANPR systems are vulnerable to cyber-attacks, which could compromise sensitive data and disrupt operations. Robust cybersecurity measures are essential to mitigate this threat.

Summary

- 6.7 Installing an ANPR system in a car park offers significant benefits in terms of security, efficiency, and revenue management. However, it also entails high costs, maintenance requirements, and potential privacy concerns.

Option 2 – Installation of Ticketed Barriers

- 6.8 A barrier-controlled car park is a parking facility that uses barriers to regulate vehicle access and exit. Typically, vehicles must pass through a barrier that raises or lowers based on specific conditions, such as payment status or the presence of a valid parking ticket.
- 6.9 Vehicles must stop at the barrier, which either raises automatically after payment is made or allows exit after the driver presents a ticket or validates their stay. Payments can be made at machines located near the entrance or exit, or through mobile apps. Some systems may also allow for pre-booking. Many barrier-controlled car parks are equipped with surveillance cameras and other security measures to enhance safety and monitor activity. These car parks often charge based on the duration of stay, making it easier to manage parking time and fees.
- 6.10 This type of system helps to manage parking availability, reduce congestion, and ensure that only paying customers have access to the parking facility.

<p>Strengths</p> <ol style="list-style-type: none"> 1. Improved Security 2. Revenue Management 3. Reduced Theft and Vandalism 	<p>Weaknesses</p> <ol style="list-style-type: none"> 1. High Installation Costs: 2. Maintenance Requirements: 3. Operational Disruptions: 4. Limited Scalability 5. User Inconvenience
<p>Opportunities</p> <ol style="list-style-type: none"> 1. Integration with Modern Technology 2. Enhanced Customer Service 3. Data Collection 	<p>Threats</p> <ol style="list-style-type: none"> 1. Technological Obsolescence: 2. Regulatory Changes: 3. Public Resistance: 4. Competition from Alternative Solutions: <ul style="list-style-type: none"> •

In terms of implementing ticketed barriers to car parks in Bromsgrove town centre, the Strengths of this approach are the security benefits; barrier systems control entry and exit points, reducing unauthorised access to car parks and enhancing overall security. Also, they would ensure accurate fee collection by controlling vehicle entry and exit based on payment or validation, and function as a deterrent to potential thieves and vandals by creating a controlled environment.

Weaknesses include the significant initial investment required for the purchase and installation of barrier systems. Ongoing maintenance would be necessary to keep the barriers operational, which could incur additional costs. Also, barrier malfunctions could cause delays and operational disruptions, leading to user dissatisfaction. A traditional barrier system may not be easily scalable or adaptable to future technological advancements. Finally, physical barriers can be seen as inconvenient by users, particularly during peak times when queues may form.

In terms of Opportunities, a barrier system could be integrated with technologies like ANPR, RFID, or contactless payment systems to enhance functionality and user experience. By implementing automated ticketing and payment systems, the parking process could be streamlined, improving customer satisfaction. Also, barrier systems can collect data on parking usage patterns, which could be used to optimise parking management operations and inform future improvements.

Threats come from the technological obsolescence that could occur from implementing such a system; rapid advancements in technology could render existing barrier systems obsolete, necessitating further investment in upgrades. Changes in regulations regarding access control and data privacy could impact the use and functionality of barrier systems. Also, users may resist the installation of barriers due to perceived inconvenience or privacy concerns. Finally, increasing availability of alternative parking management solutions, such as ANPR-only systems or app-based entry systems, could reduce the attractiveness of traditional barrier systems.

Summary

- 6.11 Installing a barrier system in Bromsgrove town centre car parks could offer several strengths, including enhanced security, effective access control, and better revenue management. However,

it also comes with weaknesses such as high initial and ongoing costs, potential for operational disruptions, and user inconvenience.

Recommendation of Preferred Option for Car Park Management

- 6.12 The SWOT analysis shows that adopting a “business as usual” approach is not optimal as the only benefits appear to be that the service provider and service users are familiar operating and using the service as it is at present. However, this is far outweighed by factors such as maintaining systems and infrastructure that support cash payment, and security concerns such as protecting revenue in the payment machines.
- 6.13 Installing an ANPR system across Bromsgrove town centre car parks offers significant benefits in terms of security, efficiency, and revenue management. There are cost, maintenance, and potential privacy concerns to overcome, and to maximise the benefits and mitigate the risks, BDC will need to undertake careful planning, compliance with regulations, and robust cybersecurity measures. Integrating ANPR with the existing online payment/smart parking solution could further enhance the user experience and operational efficiency.
- 6.14 Installing a barrier system in Bromsgrove town centre car parks could offer several strengths, including enhanced security, effective access control, and better revenue management. However, it also comes with weaknesses such as high initial and ongoing costs, potential for operational disruptions, and user inconvenience.
- 6.15 Therefore, from the SWOT analysis, ANPR is deemed the most advantageous method to install at off-street town centre public car parks due to the strengths and weaknesses outweighing the strengths and weaknesses of a barrier system and “business as usual.” Furthermore, installation of ANPR also offers significant opportunity for BDC to receive detailed data on parking habits across their car parks, helping them to make informed decisions on tariffs, redevelopment, and improvements to car parks.

7. Costs and ROI of Preferred Car Park Management Option

Introduction

- 7.1 In this section we explore the preferred option to improve car park management within the district through installing an ANPR system at Bromsgrove town centre public car parks.
- 7.2 The installation of ANPR cameras would provide a system to monitor vehicles entering and exiting the car parks and would provide information on length of stay (without the requirement for the installation of a barrier at the entrance and exit of the car park). The estimated cost of installing ANPR cameras and the legal framework to implement the system is detailed in the sections below.

Cost of an ANPR System

- 7.3 The cost of installing and maintaining an ANPR parking management system depends upon several variables and factors that need to be considered. However, we have given a broad order of magnitude cost of the elements that would be involved in the installation. These are broken down below:
- Video Camera Cost (Not including server and software) - £470 - £700.
 - Specialised ANPR Camera Cost (One off) - £1,000 - £3,000
 - Average Installation Cost Range: £700 - £1,000
 - Barrier or Gate Installation Cost Range: £1,500 - £3,000
 - Server / software – £35,000 - £55,000
 - Maintenance – Variable depending on contractor

Legal Framework to Implement an ANPR System

- 7.4 Broadly speaking, there are two scenarios when fixed ANPR cameras may be deployed in off-street public car parks in Bromsgrove. These are:
- **within a civil or special enforcement area (C/SEA) where enforcement is undertaken using powers set out in the Traffic Management Act 2004 (civil regime); and**
 - **within areas where parking enforcement is undertaken using powers set out in the Road Traffic Regulation Act 1984 (criminalised regime).**
- 7.5 In either the civil or criminalised regime, car parks should be provided on the basis of proper orders under the Road Traffic Regulation Act (RTRA) 1984 (e.g. the powers in Section 32 and 33 with Orders under Section 35 and Contraventions under Section 35A).
- 7.6 Before using ANPR cameras in off-street public car parks (under both civil and criminalised regimes), BDC must satisfy themselves that they have the power to install and use the cameras as intended. This is a complex area of the law. BDC should carefully consider the provisions of Section 35 of the RTRA 1984 and decide whether they enable an order to be made by the authority for the use of ANPR cameras at particular locations.
- 7.7 BDC might also consider the potential use of more general or ancillary powers, for example, under the Local Government Act 1972 or the Localism Act 2011. It is critical that BDC establish the necessary power to use cameras for parking enforcement, otherwise any enforcement action taken on the basis of evidence generated may be invalid. We advise that BDC involve their legal advisers on this crucial point from the outset.

- 7.8 Regulated car parks that are within a Civil or Special Enforcement Area (C/SEA) must be managed in accordance with the powers set out in the Traffic Management Act (TMA) 2004. As noted above, TMA 2004 enforcement still requires a Traffic Order (TRO/TMO) or Parking Places Order to be made under the RTRA 1984.
- 7.9 The Government confirmed a major set of reforms amending the TMA in the form of the Deregulation Act in April 2015 to make parking policy in England more motorist-friendly via restrictions on camera enforcement by local authorities. However, the reforms mainly concerned on-street parking only.
- 7.10 In C/SEA where parking contraventions only carry civil financial penalties BDC must still satisfy themselves that the same points discussed above regarding the need to establish the power to use the camera, and to ensure its use is lawful. In addition, cameras may only be used to capture evidence upon which a penalty charge is issued if they are 'approved devices'.
- 7.11 In summary, the key points for C/SEA are that:
- The car parks are within a C/SEA as specified in schedule 8 of the TMA (Greater London), or by an order made by the Secretary of State under Schedule 8. The way any such order is couched is important. If the order is only couched in terms of roads then arguably it may not apply to off-street parking. However, provided the order is defined in terms of an area (or areas) then it is likely that this encompasses any off-street car parks within the area(s). Alternatively specific car parks may be identified in CEA Orders.
 - The PCN level has been set in accordance with Schedule 9 of the TMA. The vehicle owner's copy of the PCN should be fixed to the windscreen, so it must be weatherproof or able to fit a weatherproof envelope. It should be fixed in such a way that it cannot easily be removed by wind or passers-by.
 - The cameras are 'approved devices' as required by the General Directions and meet the requirements in the Approved Devices Regulations.
 - BDC has due regard to the relevant Statutory Guidance issued by the Department for Transport (or Welsh Ministers in Wales), and other relevant considerations such as data protection and privacy law.
- 7.12 The rationale for the previous points regarding the use of ANPR cameras within a C/SEA are as follows:
- The TMA and associated Regulations and Orders**
- 7.13 The government confirmed a major set of reforms amending the TMA 2004 in the form of the Deregulation Act 2015 to make parking policy in England more motorist-friendly via restrictions on camera enforcement by local authorities.
- 7.14 So far as off-street parking is concerned, the Secretary of State for Transport wrote to all English local authorities in September 2014 indicating that the Government opinion was that it was unlawful for local authorities to use CCTV/ANPR in public car parks and informed them that DVLA would not supply information in those circumstances. That remains the Government's position.
- 7.15 However, local authorities have challenged this position and claim to have legal opinion to the contrary. English local authorities such as Lichfield and Crawley have already installed ANPR in their off-street car parks and it is recommended that BDC engage with both authorities on their approach and lessons learned.
- 7.16 Part 6 of the TMA sets out a regime for the civil enforcement of road traffic violations. Section 73 sets out the types of road traffic contravention which are subject to civil enforcement, including

parking contraventions. Section 74 and Schedule 8 make provisions about which areas are civil enforcement areas or may be designated civil enforcement areas. Paragraph 1 of Part 1 of Schedule 8 states that the whole of Greater London is a civil enforcement area for parking violations, and paragraph 1 of Part 2 states that the appropriate national authority (i.e. the Secretary of State for Transport in England or the Welsh Ministers in Wales) may designate other areas as civil or special enforcement areas.

- 7.17 Section 72 of the Act empowers the appropriate national authority to make regulations regarding the imposition and payment of penalty charges. The relevant regulation in this context is the Civil Enforcement of Parking Contraventions (England) General Regulations 2007 (the 'English Regulations').
- 7.18 Section 92 (1) of the TMA 2004 defines an 'approved device' simply as 'a device of a description specified in an order made by the appropriate national authority'. Further provisions about this process of approval are contained in Orders (made under sections 89 and 92 of the TMA), which is the Civil Enforcement of Parking Contraventions (Approved Devices) (England) Order 2007.
- 7.19 In this case the Orders contain a schedule which sets out various technical requirements which approved ANPR devices must meet (such as that the device must include a securely mounted camera that is connected to a recording system and so on). The Orders state (at article 2) that an approved device is simply a device which has been certified by the Secretary of State as meeting the technical requirements set out in the Schedule.
- 7.20 In England the approval of devices is undertaken by the Vehicle Certification Authority on behalf of the Department for Transport. The British Parking Association (BPA) has a list of certifications of approved devices.

The Statutory Guidance

- 7.21 Section 87 of the TMA requires local authorities to 'have regard' to guidance issued by the appropriate national authority as to how they should exercise their civil enforcement functions. The relevant guidance in England is the 'Secretary of State's Statutory Guidance to Local Authorities on the Civil Enforcement of Parking Contraventions' dated 28 February 2008 (the 'English Guidance').
- 7.22 Paragraphs 48 to 50 of the English Guidance concern enforcement using approved devices. Paragraph 48 states:
- 'The Secretary of State recommends that approved devices are used only where enforcement is difficult or sensitive and CEO enforcement is not practical. Approved devices should not be used where permits or exemptions (such as resident permits or Blue Badges) are not visible to the equipment may apply.'*
- 7.23 This part of the Guidance potentially creates restrictions on the use of ANPR cameras which are not contained in the legislation. The effect of this part of the Guidance is not straight forward and would ultimately need to be considered in the particular context in which BDC would be thinking of using the cameras.
- 7.24 All the parking Penalty Charge Notices, regardless of whether the contravention was detected by person or camera, must be issued by a human. CEOs must check the validity of any contraventions captured by camera before agreeing to serve a PCN. The CEO may potentially become a witness in any subsequent adjudication or court action.

Return on Investment (ROI) of an ANPR system

- 7.25 Despite the initial outlay, ANPR cameras would provide a return on investment in several ways after they are installed. The returns fall within the following four categories:
- **Improved Security:** ANPR systems can significantly enhance security measures, potentially reducing crime rates and associated costs.
 - **Efficient Traffic Management:** These systems can streamline traffic flow and reduce congestion, leading to time and fuel savings for citizens.
 - **Automated Revenue Collection:** ANPR can automate toll collection and parking fee management, potentially increasing revenue and reducing operational costs.
 - **Data-Driven Decision Making:** The data collected by ANPR systems can inform urban planning and policy decisions, leading to long-term cost savings.
- 7.26 They also offer benefits in terms of:
- Automated Vehicle Access;
 - Easy User Experience;
 - Opportunity to grow revenue allowing pre-booking;
 - Can filter vehicles that are charged at the car park, authorised vehicles that effectively have a permit can automatically be approved to the desired parking rate;
 - Drivers do not need any technology attached or equipped to vehicles.
 - Can temporarily store data until a condition is met (such as paying a parking ticket).
- 7.27 The installation of ANPR cameras at the significant car parks around Bromsgrove town centre would allow for CEOs to dedicate more resource towards enforcing on-street parking issues.

Recommended Locations for ANPR systems

- 7.28 ANPR parking systems are recommended at the following car parks:
- **Recreation Road South Car Park;**
 - **Windsor Street Car Park;**
 - **St John Street Car Park;**
 - **New Road Car Park;**
 - **Parkside Car Park;**
 - **North Bromsgrove Car Park;**
 - **School Drive Car Park; and,**
 - **Aston Fields Car Park.**
- 7.29 These car parks have been selected as there is sufficient parking demand, on a regular basis, for an ANPR system to be beneficial.

Income & Costs

- 7.30 **Table 5** shows a breakdown of the income from parking charges and penalty charges, exclusive of VAT, per year, for the last 3 years that data is available:

Table 5: Income from Parking Charges

Year	Income from parking charges exclusive of VAT	Income from penalty charges exclusive of VAT
2021 – 22	£470,183.61	£20,571.42
2022 – 23	£1,004,128.92	£48,547.31
2023 – 24	£875,133.54	£45,068.88

7.31 As can be seen above, taking the most recent year in a post Covid-19 economy, £875,133.54 was generated from parking charges and £45,068.88 from penalty charges for Bromsgrove District Council. Using these figures, a standard week generates £16,830 from parking charges and £866 from penalty charges.

7.32 An ANPR camera is estimated to cost circa £5,700 for full installation per car park (excluding maintenance/software etc).

7.33 If installed at 8 car parks as proposed above, this would cost Bromsgrove District Council £45,600 plus between £35,000 and £55,000 to establish a server, with variable maintenance costs.

Installation & Signage

7.34 Examples of how cameras can be positioned as well as the signage required can be seen below.

Photograph 1: Example of ANPR Camera



Summary

- 7.35 In this section, we have outlined the preferred option to improve car park management within the district through installing an ANPR system at Bromsgrove town centre public car parks.
- 7.36 The estimated cost of installing ANPR cameras, if installed at 8 car parks as proposed above, would cost Bromsgrove District Council a broad order of magnitude £46,000 plus between £35,000 and £55,000 for establishing a server, not including maintenance costs. This cost could be offset against roughly £925,000 of annual income generated from parking charges and penalty charges combined.
- 7.37 There is a legal framework for BDC to follow to implement fixed ANPR cameras in off-street public car parks in Bromsgrove, if this recommendation is to be pursued. However, before using ANPR cameras in off-street public car parks (under both civil and criminalised regimes), BDC must satisfy themselves that they have the power to install and use the cameras as intended. This is a complex area of the law. BDC should carefully consider the provisions of Section 35 of the RTRA 1984 and decide whether they enable an order to be made by the authority for the use of ANPR cameras at particular locations.
- 7.38 BDC might also consider the potential use of more general or ancillary powers, for example, under the Local Government Act 1972 or the Localism Act 2011. It is critical that BDC establish the necessary power to use cameras for parking enforcement, otherwise any enforcement action taken on the basis of evidence generated may be invalid. We advise that BDC involve their legal advisers on this crucial point from the outset.
- 7.39 Despite the initial outlay, ANPR cameras could provide a return on investment in several ways after they are installed, including improved security, efficient traffic management, automated revenue collection and data-driven decision making.

8. Summary and Recommendations

- 8.1 The study includes a review of existing car park management strategies in Bromsgrove. We have assessed the existing conditions and enforcement methods and have provided the basis of solutions to address car parking management in the town centre, reducing the need for off-street car parking enforcement at certain locations allowing CEOs to cover greater distances outside of the town centre.
- 8.2 There is a large amount of parking in Bromsgrove town centre, of a similar scale to comparator towns of similar populations. Committed developments in the pipeline may affect the number of parking spaces that need to be provided and the demand for public parking in the town centre.
- 8.3 There is a need to achieve the best balance between the sometimes-conflicting requirements of a parking strategy, i.e. its role in supporting the town centre economy, the public realm, income to Bromsgrove District Council and other operators, traffic congestion and the objective to encourage sustainable transport and development. In developing a future parking strategy there is a need to avoid causing unintended consequences.
- 8.4 Bromsgrove District Council CEO enforcement data was analysed between 22nd April 2024 and 28th April 2024. This was to ascertain a baseline for typical CEO enforcement activity over a typical weekday period, within a neutral month. The data analysed shows Recreation Road South to be the most visited car park by CEOs with 73 visits over the 7-day period. The car park with the highest average time spent monitoring by CEOs was found to be North Bromsgrove Car Park with an average time of over 12 minutes for each visit. This town centre car park is the car park where enforcement officers spend the most time in a week, with just over 3 hours being spent there. The approximate total time spent monitoring Bromsgrove town centre car parks by CEOs over the 7-day period we analysed was 30 hours per CEO, with an average time spent in each car park being roughly 7 minutes.
- 8.5 Our recommendation to improve car parking management is to install ANPR parking cameras at town centre car parks. This would provide a system to monitor vehicles entering and exiting the car park at all times of the day, the length of stay, and payment. This hugely reduces the chances of cars that have overstayed being missed, since the cameras would operate 24 hours a day, 7 days a week.
- 8.6 Broadly speaking, there is a legal framework for BDC to follow to implement fixed ANPR cameras in off-street public car parks in Bromsgrove, if this recommendation is to be pursued. However, before using ANPR cameras in off-street public car parks (under both civil and criminalised regimes), BDC must satisfy themselves that they have the power to install and use the cameras as intended. This is a complex area of the law. BDC should carefully consider the provisions of Section 35 of the RTRA 1984 and decide whether they enable an order to be made by the authority for the use of ANPR cameras at particular locations. BDC might also consider the potential use of more general or ancillary powers, for example, under the Local Government Act 1972 or the Localism Act 2011. It is critical that BDC establish the necessary power to use cameras for parking enforcement, otherwise any enforcement action taken on the basis of evidence generated may be invalid. We advise that BDC involve their legal advisers on this crucial point from the outset.
- 8.7 A drawback to the ANPR camera proposal is that there is a considerable initial cost of buying and installing the infrastructure, but despite this, the benefits provided appear to outweigh the initial cost.
- 8.8 Should the current management arrangement be enhanced with ANPR technology in Bromsgrove town centre car parks, CEO resource could be freed up to patrol other areas of the district with a focus on on-street enforcement.

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