

Sight Scotland
Call for views: Scotland’s Pavement Parking Prohibitions: Consultation on Enforcement Regulations for Local Authorities
A public consultation has been published on the proposed content of the Enforcement Regulations for the new parking prohibitions
July 2023

About Sight Scotland

At Sight Scotland we’re tackling vision loss together. Our mission is to reach everyone in Scotland with sight loss – where and when they need us. We are here for everyone affected by vision loss in Scotland. We offer support and advice, campaign for equal rights and fund medical research. We provide learning, care, accessible formats and support blind and partially sighted people in their communities.

Our services include The Royal Blind School and education outreach services in mainstream schools, residential care for children and adults, the provision of formats which enable equal access to the written word for people with sight loss, emotional support and information to anyone living with or impacted by sight loss through our support line and community service, and expert rehabilitation and mobility training to enable people to regain independence after sight loss.

To get free support you can call Sight Scotland on 0800 024 8973. You can also get in touch by emailing us at help@sightscotland.org.uk, or by visiting our website Sightscotland.org.uk.

**Sight Scotland and Sight Scotland Veterans response to Pavement Parking consultation**

Sight Scotland and Sight Scotland Veterans responded to the consultation on the proposed Parking and the Transport (Scotland) Act 2019 and supported the introduction of a pavement parking ban. We are pleased to now have the opportunity to respond to the consultation on enforcing the pavement parking prohibitions.

As Scotland’s largest sight loss charities, we are passionate about making streets as safe as possible for people with visual impairment and recognise that pavement parking is a large barrier preventing this. We want blind and partially sighted people to be able to travel independently, comfortably, and safely and are committed to working towards this. We echo other disability organisations and support calls to review the evidence and ideas presented by Living Streets Scotland, RNIB Scotland, Guide Dogs Scotland and other disability charities to ensure the approach taken meets the aims of creating accessible and safer streets for everyone.

We know first hand the challenges faced by blind and partially sighted people when having to navigate vehicles that are parked on pavement, dropped kerbs or double parked. These present obstacles to navigation that cannot be foreseen and obstruct public footways. These scenarios make it dangerous for blind and partially sighted people to make journeys and can also add to decreased confidence when navigating public spaces.

1. **Do you agree or disagree that local authorities should be required to keep accounts for a parking prohibition contravention, similar to the process, detailed above?**

We support introducing a requirement that local authorities must keep track of accounts for a parking prohibition contravention.

We believe it would be useful to categorise what the PCN has been given for (Pavement Parking, Dropped Kerb Parking, Double Parking), as to monitor the types of dangerous parking which have occurred. Being aware of what types of parking the fines have been given for will allow us to gather specific data to assess how effective the PCNs are as a tool for enforcement on the legislation in different local authorities and/or what other methods can be put in place alongside. This data will also be useful to create and target awareness campaigns on the ban and how best to support blind and partially sighted people.

1. **Do you agree or disagree that any surplus made by local authorities for the enforcement of the parking prohibitions should be ring-fenced and used for certain transport-related purposes, similar to the process detailed above?**

We support the ring-fencing of any surplus made by local authorities, and that this should be used to make streets increasingly accessible. We would advise that the surplus money should be used to ensure streets are kept up to date and safe. For example, that there are no gaps in the pavement, that they are all flat, and that no streetlights, trees or other parts of the streets have fallen down. Alongside this, it would be worth using some of the surplus money to ensure that there is tactile paving and colour contrast lines on the streets.

From a visual impairment perspective, having tactile paving and colour contrast on streets means that blind and partially sighted people can travel independently and safely. Independence and freedom cannot be underestimated; we are aware that the numbers of people with visual impairment experiencing loneliness are very high [add statistic]. Using the surplus money to make a few changes would help to tackle this.

1. **Do you agree or disagree that local authorities should be required to submit their accounts in relation to the enforcement of the parking prohibitions, similar to the process, detailed above?**

We support the call that local authorities should be required to submit their accounts. We believe that local authorities should have to submit both the statistics of PCN’s issued, and how they enforced the regulations and parking prohibitions.

In addition to this, we support calls to gather and publish further data regarding the settlement of PCN’s to assess how effective this method is to enforce the pavement parking ban and how this is enforced.

It is essential that alongside the ban, a national public awareness campaign (e.g. public information campaigns, signs, painted white lines, and other notices) is rolled out to ensure drivers are aware of the new legislation and the consequences if breached. We’re concerned the consultation makes no reference to this as this is imperative to ensure enforcement and compliance with the legislation.

Sharing best practice among local authorities will be useful to ensure pavement parking is not subject to a ‘postcode lottery’ of enforcement. Data must be collected therefore on what methods are most effective at enforcing and implementing parking prohibitions.

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