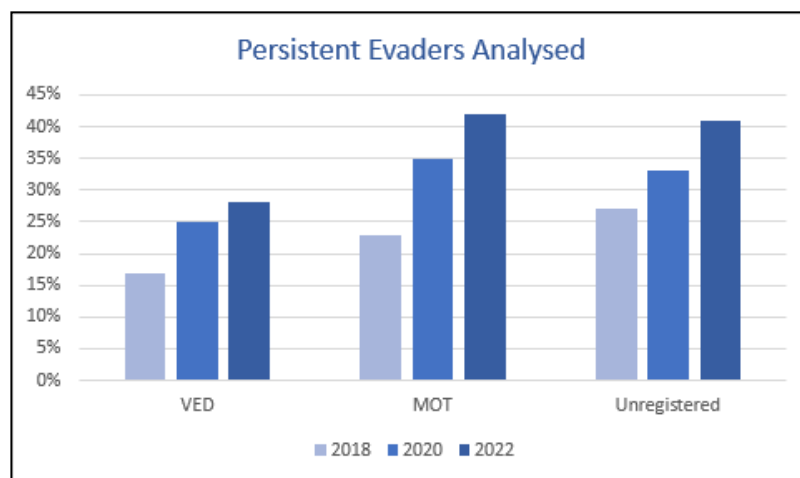


<b>Briefing Note</b>	Parking Services – Impact of Non-Registered Vehicles
Date	08/10/2024
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## 1 Background: Non-registered vehicles

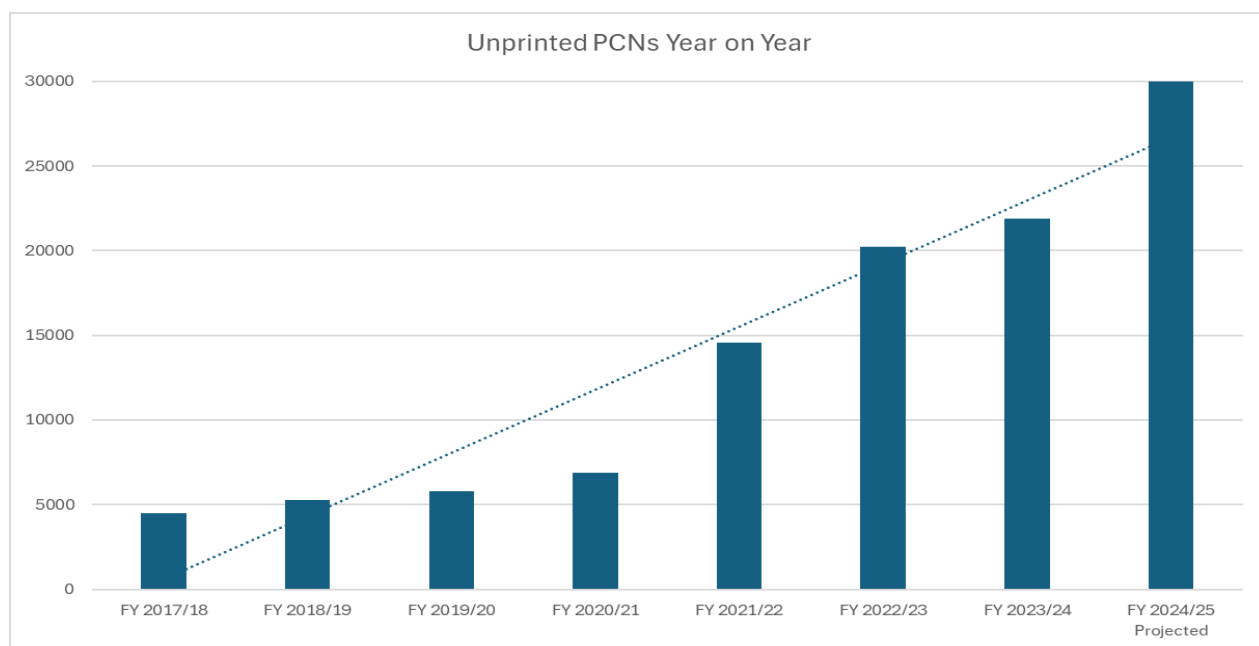
- 1.1.1 Every owner of a vehicle in the UK is required to register their vehicle at the DVLA. Figures of what percent of vehicles on the road that are registered is not readily available. However, it is commonly accepted that as a minimum 10% of vehicles are not registered at any one time.
- 1.1.2 Although legislation allows enforcement and prosecution for not registering a vehicle, unfortunately enforcement in this area is not robust, and the scale of the problem is significant.
- 1.1.3 Industry data shows that vehicles not registered at the DVLA are more likely to be abusing other road and traffic restrictions, such as no tax, insurance or MOT.
- 1.1.4 Further, there is a higher probability that unregistered vehicles contravene Parking and Moving Traffic regulations. The graph below shows the increase in vehicles that have three or more Islington issued Penalty Charge Notices (PCN's) outstanding which do not have valid tax or MOT.



## 2 Effect on Islington Parking Services.

2.1.1 If a Penalty Change Notice (PCN) is to be collected, Islington must issue a legal notice called a “Notice to Owner”. This legal document informs the owner they must pay or appeal. However, before being able to do this Islington must obtain the owner details from the DVLA.

2.1.2 It is estimated in 2024/25 that a minimum of 30,000 PCNs will not be issued because the DVLA does not have the owners’ details on file this amounts to a loss of £1.4m. Islington are currently projecting PCN issuance in 2024/25 to be in excess of 430,000.



2.1.2 This demonstrates that nearly 7% of all PCNs issued will never be served on the owner. The average value of a PCN is approximately £49. Therefore, the potential loss to Islington in 2024/25 will be c£1.4m. It should be noted that this figure would be less if the vehicles were indeed registered as the drivers would be receiving the PCNs, this would act as a deterrent and improve their driving behaviours.

2.1.3 This increasing issue has been built into the PCN income projections.

## 2.2 Trend analysis.

2.2.1 The graph above shows in recent years the significant increase in PCNs issued to non-registered vehicles year on year. This has coincided with the expansion of CCTV enforcement cameras. Motorists have identified that if they are not registered at the

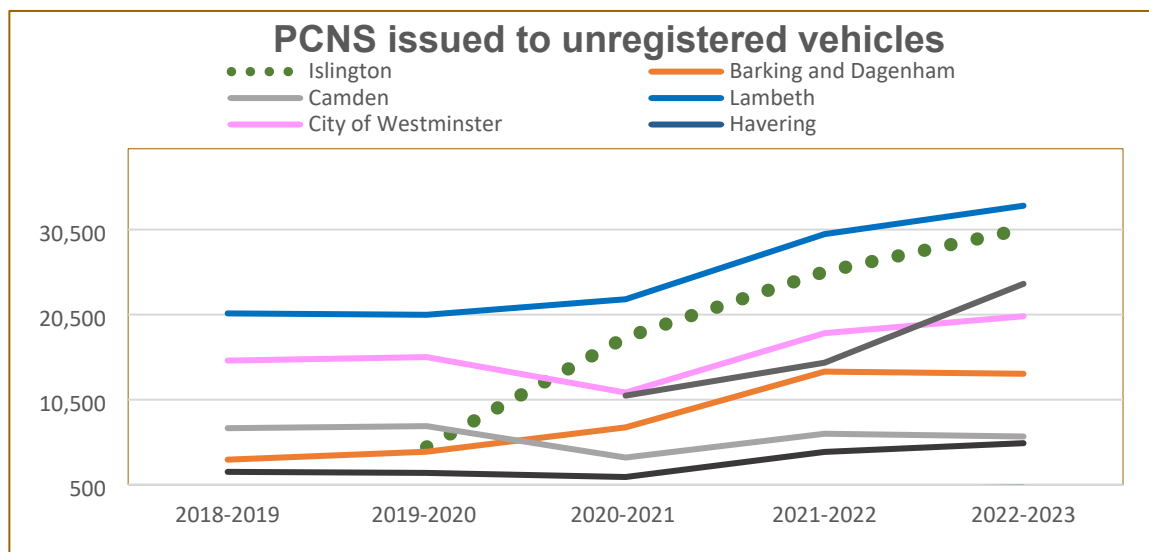
DVLA they can drive through any location enforced by CCTV with impunity. These include Low Traffic Neighbourhoods, School Friendly Streets, Bus Lanes, Yellow box junctions, banned turns etc

2.2.2 Data analysed shows that the issue is the cause by a relatively few number of individuals committing multiple offences. On average each vehicle received 7 PCNs. However, there are individuals that have accumulated many 100s of PCNs in a year.

### 2.3 London and National problem.

2.3.1 Islington has benchmarked data with other London Authorities as shown in the table below. The results show that it is a similar trend throughout London.

2.3.2 Lewisham appear to have a particular recent problem which appears greater than others, but even with removing Lewisham data who have reported over 150,000 PCNs could not be issued due to this issue, the graph below confirms the significant increase in many authorities.



### 2.1 Government and Action by the Parking Sector.

2.1.1 The source issue is out of Islington's control and requires direct action by Central Government. This may require a change in legislation and / or a fundamental shift in the enforcement activity of the police and other agencies against unregistered, untaxed, uninsured vehicles and those without MOT

2.1.2 The British Parking Association and London Councils are all fully aware of the issue and taking what action they can to lobby policy and law makers, but their powers are limited. The Parking industry is beginning to share data and databases such as the National Persistent Evaders Database (NPED) [NPED - National Persistent Evader Database](#) which will help identify vehicles across borough boundaries, and work within the sector does continue with the police to join up data and analysis.

## 2.2 Direct action being taken by Islington.

2.2.1 Islington has been very active in addressing the problem at a local level. Specifically targeting vehicles with multiple PCNs outstanding on a vehicle that have been issued by Islington. Below are some of the actions Islington have taken so far.

- **Clamping and Removal.** Parking Services have set up a clamping and removal operation. The clamping vehicle will target vehicles with multiple outstanding PCNs. Many of which will not be registered at the DVLA. Once a vehicle is clamped and removed the owner will be required to provide proof of name and address. We can then serve outstanding PCNs on the owner. If they remain unpaid, the Enforcement Agents (Bailiffs) then have a name and address to collect the debt against. If the vehicle is not collected from the pound within 28 days and there has been no contact, the vehicle is either sold at auction or disposed of.
- **Joint Venture with DVLA** – The Parking team have started to share data with the DVLA on persistent evaders that are untaxed or SORN, along with their likely parking locations based on our data analysis. The DVLA attend the borough once a month and use this information to locate and act against these vehicles.
- **Aged debt collections** – Parking have set up a civil debt collection process with the Enforcement Agents for expired warrants. £60k has been collected through this new process in 2024/25.
- **Cloned vehicles** – Parking have introduced a new process on a trial basis. This involves obtaining the keeper details using the vehicle's Vehicle Identification Number (VIN) number, rather than the cloned registration number displayed on the vehicle. This will allow identification of the person responsible for paying the PCNs and carry out enforcement action if necessary. Before every removal, the officer carries out a HPI and VIN check. If the vehicle has been reported stolen, the police are notified, they then collect the vehicle from the pound.
- If the vehicle is not stolen but is a clone (VIN check shows different true VRM), the vehicle is removed to the pound and the Police are advised they provide any details they

may have available. The officers contact the insurance company who usually makes payment to release the vehicle if not, the vehicle is disposed of.

- **RingGo (cashless data)** – A new process has been introduced to cross reference the list of persistent evaders with live RingGo (cashless pay & display) data showing where vehicles are parked. If any persistent evaders are identified to be parked in the borough and have warrants issued to them, the relevant Enforcement Agent (bailiff) is notified of the vehicle's location so that they can attempt to remove it.
- **Pre debt proactive communications** – The Parking team send communications to drivers with multiple PCNs outstanding to ask them to contact the Council to arrange payment of their PCNs, warning them that we may take enforcement action via our Enforcement Agents (bailiffs) if they do not. This action is for vehicles for which we have managed to obtain the registered keeper details.
- **Permits** – Consideration is being given to blocking permit applications for identified persistent evaders. We are also considering a new alert that will direct residents with outstanding PCNs to settle these before applying for a permit.
- **Clamping and removals** – Parking are introducing a clamping operation to increase the enforcement capacity, targeting vehicles that avoid payment e.g. unregistered vehicles, foreign vehicles. The 3-month pilot is due to commence on 21<sup>st</sup> October 2024.
- **Payment plans** – Payment plans have now been introduced where customers request this. The team are also exploring ways to offer self-service payment plans. This should result in more PCNs being settled before debt registration, saving on costs to the Council and the motorist.

### 3 Summary.

- 3.1.1 The issue of unregistered vehicles is caused by vehicles not being registered at the DVLA and limited resources by government to enforce those who are not registered. This is a national problem
- 3.1.2 The inability to be able to serve statutory documents on the owner of the vehicle means PCN's cannot be served and then remain unpaid. It is estimated that the value of lost income for 2024/25 will be £1.4m.
- 3.1.3 Islington has taken direct action and will continue to do so to alleviate these issues in Borough, the team will share the successes and experiences with other local authorities and work with other agencies to tackle this growing issue

END.