

APCOA Parking (UK) Limited

Subject: Formal Appeal Against "Parking Charge" STN<REDACTED> - Vehicle Registration <REDACTED>

Dear Sir/Madam,

I am writing to formally appeal the purported Parking Charge STN<REDACTED> issued for vehicle <REDACTED> at London Stansted Airport on <date>. I am the registered keeper of this vehicle.

My grounds for appeal are as follows:

1. **Non-Relevant Land (Statutory Control by Byelaws):** The alleged parking contravention occurred within the Pick Up/Drop Off zone at London Stansted Airport. This land is subject to statutory control in the form of Airport Byelaws (e.g., the Airport Byelaws 1991, or subsequent revisions). As such, this land is explicitly excluded from the definition of "relevant land" under Schedule 4(3) of the Protection of Freedoms Act 2012 (POFA 2012). Consequently, APCOA Parking cannot rely on POFA 2012 to pursue the registered keeper of the vehicle for this purported charge. As the land is not "relevant land" under POFA, the registered keeper (myself) is not liable for this alleged charge, and I am under no obligation to disclose the identity of the driver.
2. **Failure to Establish Keeper Liability under POFA 2012 – No POFA Declaration and Assumption of Driver:**
As the registered keeper, it cannot be inferred that I was the driver of the vehicle at the time of the alleged contravention. The vehicle has multiple authorised drivers. The purported Parking Charge fails to properly establish keeper liability as required by POFA 2012. Specifically, the document does not contain the mandatory POFA declaration clearly stating that the keeper will be held liable for any purported charges if the conditions within POFA Schedule 4, Paragraph 8(2)(f) and (g) are met.
3. **Inadequate and Questionable Evidential Photos:**
The alleged contravention photos provided are woefully inadequate and cast significant doubt on the validity of this purported charge. They do not show anything beyond the vehicle itself; there is no discernible indication of the location, nor any visible road markings relevant to the alleged contravention. It appears, as far as I, the registered keeper, can discern, that these images could have been taken by a child with a disposable camera, lacking any professional or reliable context.
Furthermore, the time stamp is not natively imposed on the image itself, but rather appears to be added in a manner that raises serious concerns about the integrity of the evidence. This method provides no means to ensure the images are tamper-proof, leading me to cast doubt on whether these images have been manually reviewed or even subject to alteration.

I therefore require you to cancel this purported Parking Charge.

Yours faithfully,

<REDACTED>