

Wyre Forest DPE Feasibility Study

- Final Report

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- 1 Implementation programme
- 2 PCN recovery process
- 3 DPE SPA/PPA application requirements
- 4 The National Parking Adjudication Joint Committee
- 5 Operational approach to DPE for authorities in England & Wales (outside London)
- 6 Key assumptions and financial summary details

1. INTRODUCTION

1.1 Overview

- 1.1.1 Part of Colin Buchanan's report on the Wyre Forest Parking Review (2004) presented an overview of decriminalised parking enforcement (DPE) and one of that study's recommendations was that a full feasibility study of DPE covering the entire District be carried out. Subsequently Wyre Forest District Council (WFDC) has appointed CB to undertake a preliminary assessment into the feasibility of introducing DPE in the district.

1.2 Issues

- 1.2.1 Illegally parked vehicles can have an impact on:
- Road safety by obstructing sight-lines
 - Traffic flow by reducing capacity
 - Bus operations by reducing capacity and obstructing bus stops and other bus facilities such as bus lanes
 - The local economy by reducing servicing opportunities and opportunities for shoppers to park
 - Cyclists, walkers and the mobility impaired by obstructing pavements, crossing points and other facilities
 - Disabled motorists by reducing opportunities for them to park
 - Local residents, particularly where there is a high level of in-commuting or tourist parking demand
- 1.2.2 Parking enforcement therefore has an impact on almost all aspects of transport policy in urban areas and is becoming increasingly important as the pressure on available road space and the extent of traffic regulation orders both increase. One of the key outcomes of studies into the potential for improving parking enforcement was the 1991 Road Traffic Act, which allowed local authorities to undertake some enforcement duties in place of the Police/Traffic Warden Service (Decriminalised Parking Enforcement).

1.3 Structure of the report

- 1.3.1 This report summarises:
- The general principles of DPE - Chapter 2

- Legal issues and requirements - Chapter 3
- Key features of the existing situation in Wyre Forest - Chapter 4
- An initial estimate of the Business Plan - Chapter 5
- Consultation requirements for DPE - Chapter 6
- Recommendations - Chapter 7

1.3.2 Some of the information contained in this report was also provide in CB's report on the Parking Review. It is however repeated here for completeness.

2. INTRODUCTION

2.1 Introduction to DPE

2.1.1 The Road Traffic Act 1991 (RTA 1991) permitted the decriminalisation of most non-endorsable parking offences for specific areas in the UK. The provisions of the Act may be summarised as:

a) Local highway authorities may apply to the Secretary of State for orders decriminalising offences within particular geographical areas;

b) Within these areas:

- Enforcement ceases to be the responsibility of the police and wardens and becomes the responsibility of the authority
- Parking attendants can place Penalty Charge Notices (PCNs) on vehicles contravening parking regulations
- In appropriate circumstances (and where these powers have been requested by authorities) attendants can authorise the clamping or towing away of vehicles
- Penalty charges are civil debts, due to the authority and enforceable through a streamlined version of the normal civil debt recovery process
- Motorists wishing to contest liability may make representations to the authority
- If these representations are unsuccessful, they may appeal to independent parking adjudicators, whose decision is final
- The local authority retains the proceeds from the penalty charges, which are used to finance the enforcement and adjudication systems and for certain other traffic management purposes as set out under Section 55 of the RTRA 1984 (as amended by the RTA 1991), these being
 - to make good to the general fund any amount charged to the fund for deficits in the proceeding four years
 - for the provision or enhancement of off-street facilities
 - for public transport improvements
 - for highway improvements

2.1.2 An important consequence of DPE is that any transfer of duties from the police to the local authority may be subject to the Transfer of Undertaking Protection

of Employment Regulations (TUPE). Each such case must essentially be considered on its merits, and will need to be reviewed by Council and Police legal departments. A transfer is usually deemed to occur if the entity (people and assets) retains its identity and function on transfer.

2.2 Advantages of DPE

2.2.1 The main advantages of DPE are:

- Local authorities are able to ensure that parking policies are effectively implemented and enforced, with consequent benefits in improved traffic and public transport flow, road safety, use of parking spaces and environmental benefits
- The integration of all enforcement and parking policy provides opportunities for better monitoring and use of enforcement, enabling it to become more responsive to public needs and the authority's requirements
- Local authorities can use the revenue received from penalty charges to fund enforcement and any surplus for transport-related projects

2.3 Permitted Parking and Special Parking Areas

2.3.1 Section 43 and Schedule 3 of the RTA 1991 enable local authorities to apply to the Secretary of State for orders creating:

- Permitted Parking Areas (PPAs) - within these areas contraventions of orders designating permitted on-street parking places (such as meters, resident bays and free bays) will no longer be criminal offences and will become subject to the new arrangements
- Special Parking Area (SPAs) - within these areas most other non-endorsable parking offences (i.e. primarily those relating to yellow line offences and off-street car parking offences) will be decriminalised

2.3.2 Current guidance makes it clear that there is nothing to prevent a PPA or SPA overlapping or having the same boundaries, indeed that this will usually be essential if enforcement is to be effective. The guidance indicates that the proximity of on- and off-street parking controlled by the authority is a key factor in having an overlapping PPA and SPA. It is believed that there are clear advantages in combining a SPA and PPA area. These are:

- Elimination of potential problems due to different enforcement policies by wardens and attendants (e.g. 'migration' of offenders)
- Making the new arrangements easier for the public to understand
- Making enforcement more cost-effective with a unified enforcement force

- 2.3.3 For the purposes of this study therefore all references to a SPA include a conterminous PPA i.e. that these areas will have the same boundaries.

DPE area

- 2.3.4 Most current DPE operations have applied to use RTA 1991 powers for the whole of their Council area – this is usually supported by the police who do not wish to retain a parking enforcement service for only some of a Council area. Key exceptions to this are usually:
- Trunk Roads, where the Secretary of State is the traffic authority and where the low number of illegal parking acts and nature of the road usually makes enforcement by the Police desirable
 - Private roads with traffic regulation orders - airports, Royal Parks etc. - where these orders are made under the appropriate part of the RTRA 1984
 - 'Special' cases such as London's Red Routes, which are still enforced by the Metropolitan Police

2.4 Guidance for local authorities

- 2.4.1 In 1995 the Department of Transport published 'Guidance on Decriminalised Parking Enforcement Outside London' (Local Authority Circular 1/95), which was also endorsed by the then Welsh Office. This guidance built upon the experience of applying the RTA 1991 in London and gives advice to local authorities on the necessary application and operation of a decriminalised enforcement regime.
- 2.4.2 Recently, new guidance has been issued on revised PCN values to be used within a DPE regime at £40, £50 or £60. The appropriate rate to be used is discussed in more detail under revenues in Section 5.2 of this report.

2.5 Provisions of the Road Traffic Act 1991

- 2.5.1 The RTA 1991 was primarily enacted to decriminalise parking offences in London. However, Schedule 3 to the Act enables the Secretary of State, following application by a Council, to make an order designating the area to which the application relates as a Permitted Parking Area (PPA) and a Special Parking Area (SPA). This has the effect of decriminalising parking and bringing about a local authority enforcement system as developed for London.
- 2.5.2 Schedule 3 also requires the Secretary of State to consult the appropriate chief officer of police before making an order. Where the order creates a PPA and a SPA, certain contraventions are decriminalised within the relevant area. These are in respect of offences relating to:

- Orders prohibiting or restricting the waiting, loading and unloading of vehicles (Sections 1 and 9 and 14 of the RTRA 1984)
 - Parking of heavy vehicles on verges, central reservations and footpaths (Section 19 of the RTA 1988)
 - Off-street and free parking places on roads (Sections 35 and 32 of the RTRA 1984)
 - Designated or free parking places (section 32(1)(b) and section 45 of the RTRA 1984)
 - Section 21 of the RTA 1988 prohibiting parking on a cycle track.
- 2.5.3 The Secretary of State may add further provisions in relation to offences in respect of stationary vehicles after appropriate consultation with chief officers of police and associations of local authorities.
- 2.5.4 The RTA 1991 also empowers the Secretary of State to:
- Provide for such provisions (and modifications if any) of the London provisions of the Act as he considers appropriate
 - Make such modifications of any enactment, as he considers appropriate to give effect to the above provisions
- 2.5.5 Over 80 authorities outside of London (where all 33 boroughs were required to decriminalise by 4th July 1994) have already adopted the powers for DPE. Further applications are being processed.
- 2.5.6 An indicative project plan for implementing DPE is included in Appendix 1.

2.6 Other issues arising from the RTA 1991

- 2.6.1 In addition to the main features of the Act as described above there are a number of other consequences of its provisions. These are:
- Application for use of the Act's powers is in the discretion of each local authority
 - While it appears that designation orders giving authorities enforcement powers over decriminalised offences can be revoked and varied, it is likely that the relevant police force would resist the 're-criminalisation' of offences and consequent resumption of enforcement responsibilities, particularly without the resources to match these responsibilities
 - The system of "initial" and "excess" charges is replaced by the Penalty Charge Notice system

- Traffic Regulation Orders must be reviewed and amended to ensure that they match the legal requirements in the RTA 1991 – these changes can be made using the 'shortened' procedure usually used for consolidation orders
 - Endorsable parking offences (broadly those involving dangerous or obstructive parking) will remain criminal and can only be enforced by the police and courts in the traditional manner. The police will also remain responsible for the full range of moving traffic offences, and for taking action against any vehicle where security or other traffic policy issues are involved, including the need to close roads or set up diversions
 - Outside the areas where an authority is enforcing decriminalised parking, all parking offences will remain subject to the criminal law
- 2.6.2 The new decriminalised enforcement did generally not apply to the following offences (unless prohibited in terms of specific Traffic Regulation Orders for that authority):
- Parking on zig-zags at pedestrian crossings
 - Double-parking
 - Parking on footways (with the exception of decriminalised offences involving HGVs)
 - Parking on school keep-clear markings
- 2.6.3 Disabled Badge Holders (DBHs) are generally exempt from most forms of regulation, except where there is a loading ban in force. However DBHs are still required to behave in an appropriate manner when parking – effectively this means that they must not double park or stop at junction corners, park on the pavement or stop on white 'zig-zag' markings. DBH motorists who misuse badges can be fined by the police (S21 of the Chronically Sick and Disabled Persons Act 1970, as amended by the RTA 1991) and have the badge removed by the local authority.
- 2.6.4 Offences relating to DBHs were not decriminalised generally under the RTA 1991. However where an authority suspects that a motorist is not an authorised user (e.g. faded or illegible badge), or where the motorist is parking in contravention of a traffic regulation order (e.g. parking during a loading ban) they can issue a penalty. It may also be possible to word traffic regulation orders in such a way (e.g. require use of DBH as per regulations) that allows more flexibility in the issue of penalties for misuse.

2.7 Traffic Management Act 2004

- 2.7.1 The Traffic Management Act 2004 makes provision for civil enforcement areas within which parking contraventions and, potentially, certain moving traffic offences are enforced by local authorities.

- 2.7.2 With respect to parking it added certain offences that were not encompassed by DPE under the RTA 1991. These include parking at taxi stands and parking at or near pedestrian crossings. The Act also gives the Secretary of State powers to require a local authority to make an application for an order designating the whole or part of the authority's area as a civil enforcement area for parking offences.
- 2.7.3 The Act also provides for local authorities outside London (these powers already being available to London authorities) to apply for civil (decriminalised) enforcement powers with respect to:
- Bus lane contraventions
 - Contravention of a range of moving traffic regulations including one-way streets, banned turns, entry prohibitions, box junction markings, cycle lanes, bus/tram/cycle only routes
- 2.7.4 Civil enforcement areas for these offences will however only be designated if they are coextensive with an area already designated for civil parking enforcement. Parking attendants designated under DPE can be designated civil enforcement officers for moving traffic offences.

2.8 Penalty Charge Notice (PCN) process

- 2.8.1 The basic PCN recovery process is set out in Table 2.1. A detailed flowchart of the process is included in Appendix 2.

TABLE 2.1: PCN PROCESS UNDER THE RTA 1991

Stage in process	Timing *
PCN issue by attendant	Start of process
Payment at discounted rate (typically 50%)	Within 14 days
Notice to Owner (NtO) Issued	After 28 days of non-payment.
Representations against PCN	Within 28 days of NtO issue
Appeals	If Representation not accepted by LA, registered keeper can appeal
Charge Certificate (CC)	Sent if no representation or payment within 28 days of NtO. Increases penalty by 50%
Register of Charge Certificate at TEC	After 14 days of CC being served, the authority must allow 21 days from the date the CC was posted before registering it.
LA request TEC for authority to prepare a warrant of execution.	After 21 days have elapsed since service of the registration order was effected.
Production of warrant	Within 7 days of receipt of the authorisation to do so from the TEC and a copy can be given to a certified bailiff for execution

* Most authorities add 5-7 days to each statutory minimum time period to allow for postal delays

2.9 DPE application

2.9.1 A traffic authority must apply to the Secretary of State for the DPE powers. A summary of the application requirements is given in Appendix 3. The procedure can take 4 to 6 months, although based on experience elsewhere this can be reduced. The order must be laid before Parliament twenty-one days before it is due to come into force. The anticipated timescales are therefore:

- Draft application to Secretary of State
- Review of draft by SoS - 4 weeks
- Final version by Council - 2 weeks
- Consultation by SoS - 4 weeks
- Preparation of Designation Order by SoS - 6 weeks
- Designation Order signed by Minister
- Designation Order laid before Parliament - 3 weeks

2.9.2 The Secretary of State also requires that traffic authorities undertake:

- A policy assessment – to review parking policy and traffic regulation orders to ensure that their policies are in line with wider objectives (including the

Local Transport Strategy), that the demand/supply of parking is adequate and the levels of compliance which are required.

- A review of the TROs to ensure that these are accurate, accessible and appropriate.
- A review of road markings and signing to ensure that these match the TROs. The standard of lining and signing varies from location to location within the authority so it is proposed that a full review will be required in preparation for DPE. Any outstanding items can be rectified and a programme of maintenance introduced where required.
- Establishes the views of the police - these are likely to be a key factor in any decision on the application area. Nationally police forces are generally encouraging DPE and transferring traffic wardens to Councils for this operation – however in some cases the Police have retained traffic wardens for other purposes such as traffic control and school crossing patrols. In connection with CB's assessments of DPE in Wyre Forest West Mercia Police indicated that they would want a transfer of powers to be completed as soon as possible.

2.10 Consultation

2.10.1 Some formal consultation on the DPE application is required. Key consultees are:

- The Police – their support for the proposed DPE regime will be important in the decision by the Secretary of State
- Other local authorities – consultation is recommended, but there are unlikely to be any major issues raised
- The public – there is no statutory requirement for this but some local consultation is recommended. In addition the proposed charges under DPE must be published in a local newspaper and be available at council offices at least 14 days before commencement of operations
- Highways Authority – for consultation on the roads to be excluded from the application for DPE

2.10.2 In addition, many authorities also consult with various local interest groups prior to taking a recommendation to Committee.

2.11 Appeals

2.11.1 An authority must satisfy the Secretary of State that an impartial and independent adjudication (appeals) system is in place for DPE. There are three aspects of adjudication to consider:

- The processing and extent of appeals
- Appointment of adjudicators and
- Administration of the service

2.11.2 When a local authority rejects a (statutory) representation made by a motorist, the Council must at the same time supply the motorist with information (effectively an appeals application form) for the appeal process. On receipt of an appeal by the adjudication service, information is requested from the local authority and a hearing (written or oral on the request of the motorist) is arranged. Experience to date is that less than 1% of PCNs give rise to an appeal, and that some 42% of these result in an oral hearing – the remainder are dealt with by an adjudicator on the basis of documents submitted to him/her.

National Parking Adjudication Service

- 2.11.3 The National Parking Adjudication Service for England and Wales is now established for those authorities outside of London that have taken on DPE. Its function is to process and adjudicate on appeals against PCNs issued by councils in England and Wales, under the Road Traffic Act 1991. This involves receiving appeals, collecting information from the Council(s), scheduling a hearing and notifying the Council and motorist of the decision.
- 2.11.4 NPAS is an independent tribunal. Parking Adjudicators are appointed with the express consent of the Lord Chancellor and operate under the supervision of the Council on Tribunals. Parking Adjudicators are lawyers with a minimum of five years legal experience.
- 2.11.5 The Road Traffic Act 1991 requires those councils that operate decriminalised parking enforcement to fund the provision of parking adjudication. Thus the NPAS does not place any form of burden upon the taxpayer. This principal is common in the area of tribunals. The funding mechanism is agreed annually by a joint committee of enforcing councils (the National Parking Adjudication Service Joint Committee).
- 2.11.6 If WFDC proceeds with DPE it will need to action the legal requirement to appoint a Councillor to be its representative on the NPAS Joint Committee. The Council will need to arrange suitable premises within Wyre Forest for oral hearings. These premises should if at all possible be independent of the Council. Hearings are likely to take place on an infrequent basis (say once a month/every two months) and sometimes hotels are used for this purpose.
- 2.11.7 It is assumed that WFDC will join the NPAS. We have budgeted in the financial appraisal (Chapter 5) for a yearly fee of £500, a further £0.65 per PCN issued and cost of £3,000 pa for the provision of accommodation for appeal hearings. Clearly the more authorities that join an administrative

system, the lower the fixed overhead cost of the service per authority will be. The NPAS is explained further in Appendix 4.

2.12 Debt recovery

- 2.12.1 If a penalty remains unpaid 14 days after a charge certificate has been issued the local authority can register the charge certificate with the Traffic Enforcement Centre (TEC). There is a fee for registration of £10, which will be added to the amount to be recovered but which is initially payable by the authority. When registered the TEC will post an authority to recover the amount outstanding. Within seven days the authority must then send an order informing the motorist that, within a further 21 days from receipt of the order, they must either pay the outstanding amount or send to the TEC a statutory declaration that the registration of the unpaid penalty should be revoked. Where the motorist fails to pay or to complete a statutory declaration the local authority can ask the TEC for authority to prepare a warrant of execution. This authorises a certified bailiff to seize and sell goods belonging to the motorist to the value of the outstanding amount plus the costs of the executing warrant.
- 2.12.2 Experience in London has indicated that an authority must use the full debt collection recovery process to encourage compliance with regulations and the PCN process – in authorities where politicians did not initially allow debts to be followed up by bailiffs, recovery rates dropped significantly.

3. DPE OPTIONS

3.1 CCT requirements

- 3.1.1 Prior to 1998, local authorities were required to tender out the issuing of PCNs and wheel clamping and removal activities and pound management. All other activities could be contracted out or remain as 'in-house' operations.
- 3.1.2 Subject to a 'Best Value' review there is no obligation to tender out any of the activities associated with DPE – this is at the discretion of an individual authority. Some aspects of the service cannot be 'contracted out' – see "Legal Duties" below.

3.2 Legal duties

- 3.2.1 Under the Road Traffic Act 1991 (RTA1991- Schedule 6) local authorities have a duty to consider representations made by motorists and to serve on the motorist notice of their decision. In terms of the RTA 1991, a representation is any written appeal made by a motorist who has received a Notice to Owner (NtO).
- 3.2.2 Consequently Department for Transport advice is that this function cannot be contracted out, although some authorities use contractors to make an initial decision which they review. However, given the close relationship between enquiries received prior to NtO and those formal representations received after NtO, many authorities believe there are consequent advantages in handling all correspondence in-house.

3.3 General options

- 3.3.1 The main options for the carrying out of the necessary functions are summarised below:
 - Option 1: All activities in-house: Processing and enforcement carried out in-house – a number of authorities use this model, particularly those with extensive experience in dealing with parking control.
 - Option 2: Processing in-house, enforcement contracted out: This model is used mainly by new DPE operations where authorities do not already have experience and resources available for enforcement at commencement of DPE.
 - Option 3: Enforcement in-house, processing contracted out: This option is not used by any existing operation, probably because of the legal issues concerning the authorities' consideration of representations.

- Option 4: All activities contracted out: This option is generally used by authorities who have little or no experience in parking operations or who do not have the necessary in-house staff or financial resources to accommodate a large scale increase in their existing operations.

- 3.3.2 One authority (LB Camden) ran both in-house and contracted-out enforcement teams at the same time, albeit for different geographic areas. It is believed that this step was initially taken to ensure that sufficient resources were available in a short time scale for commencement of DPE – it also allows for some 'benchmarking' between the two operations. However the in-house operation subsequently lost the bid in the re-tendering process.
- 3.3.3 The above models are used in a number of different authorities (for those in England and Wales see Appendix 5). There is little clear-cut evidence that any one model will perform better across all authorities. The decision must be based on the individual circumstances at each authority, and the section below highlights key issues that will assist in making this decision.

3.4 Key issues

- 3.4.1 Existing operations: Where a Council has a well-established existing operation that is performing to a high standard, there are advantages in retaining this. The staff is experienced in local issues and policies and is a 'known quantity' – they typically have confidence in applying local regulations and in operating the existing IT system. While some staff may transfer to a contractor, the generally lower private sector rates of pay and benefits are likely to lead to a loss of the experienced staff.
- 3.4.2 Where an authority has no previous experience, there may be opportunity costs (and time constraints) in acquiring expertise – significant management resources will also be required. In these circumstances the decision to contract out parts of the service may have benefits.
- 3.4.3 Integrated approach: Experience in other operations indicates that a successful DPE operation is one that is as integrated as possible, with close links between the enforcement and processing operations. This can lead to efficiencies and cost savings in respect of staff, IT and customer relations.
- 3.4.4 Experience elsewhere: At least two major DPE operations (LB Wandsworth and RB Kensington and Chelsea) have moved from a contracted-out situation to one in which only enforcement is contracted out. Their experience was that in-house processing offered clear advantages to the local authority on both practical and financial terms.
- 3.4.5 Public acceptance of enforcement action: some authorities believe that the public are less inclined to complain about services being performed by contractors. However experience in some other operations (e.g. Manchester, Edinburgh) indicate that this may not always be the case.

- 3.4.6 Public acceptance of processing decisions: There are indications from other operations that drivers will try to 'play off' the Council and a contractor by appealing to the Council after the contractor has made a decision they do not like. While this can be a way of reviewing a previous decision, it inevitably leads to more correspondence and council resources being used.
- 3.4.7 Locally based staff: Some contractors process PCNs and phone calls at centralised locations where they can achieve economies of scale. This can lead to staff responding to the public without a good knowledge of the area and Council procedures. This can be avoided by requiring a local base for the processing operation in the contract, but this will probably reduce any economies of scale and potential cost savings over an in-house operation.
- 3.4.8 IT system: An efficient IT system is usually critical to the success of a DPE operation. In an in-house operation the Council has considerable influence on which system is used. When operations are contracted out, they generally use the Contractors IT system – however this can lead to problems when a Council has special features (e.g. a complex permit system) and when there is a change between contractors.
- 3.4.9 Flexibility: While there are a number of contracted out operations which operate very successfully, in many other cases the contractual obligation between the parties can lead to a level of inflexibility in adapting to local situations and changes. Where a local parking control system is complex, there are advantages in a more co-operative in-house operation.
- 3.4.10 Continuity: Most contracts are for 3-5 years, and may lead to a change in contractor after this period. This can lead to continuity problems, with staff not always "following" the contract.
- 3.4.11 Timescale: Most DPE operations are of the size that requires European Union procedures to be used to advertise and select tenderers. This procedure can typically take 12 months from advertisement to the start of operations.
- 3.4.12 Financial transparency: Some authorities claim that outsourcing can give greater financial transparency – however given the statutory requirement to retain a separate parking account, it is unlikely that these advantages are significant.
- 3.4.13 Other local issues: In circumstances where local parking controls are complex and where parking attendants are required to undertake other duties (such as assisting tourists, checking security of motor vehicles), an in-house operation is likely to offer advantages, particularly where there is an established operation.

Summary:

- 3.4.14 There are many different issues to consider in deciding on in-house or contracted-out activities. Key aspects are likely to be the existence of an

existing operation, and the local requirements for enforcement, particularly where there is a complex system of controls and where the needs of, for example, tourists require special attention.

3.5 Financial considerations

- 3.5.1 A key advantage behind contracting out activities is the avoidance of set-up costs by the local authority (although these will form part of the overall costs paid by the authority to a contractor). In the case of an existing operation, many of the set-up costs have already been incurred. It is also possible to reduce the initial impact of some set-up costs by leasing capital equipment rather than purchasing.
- 3.5.2 Another possible advantage with a contracted out service could be productivity and/or lower operating costs of the service – however these cost savings must be greater than the profit margin of the private sector operator to result in a net saving to the authority.
- 3.5.3 It is difficult to obtain a representative estimate of private sector cost of running enforcement and processing operations. This information is commercially sensitive, varies between contracts and between operators and must also be used with an indication of the quality of the service.
- 3.5.4 While many private sector operators claim a higher level of efficiency in enforcing and processing PCNs, there is little clear-cut evidence to substantiate this. While some in-house operations appear to be less efficient, those with strong management and good organisation and technology are amongst the best performing in the country. An example is the LB Wandsworth operation, which has an in-house processing unit achieving the highest levels of PCN recovery.

3.6 Conclusion

- 3.6.1 It has been assumed for the purpose of this study that Wyre Forest DC will initially consider expanding its existing off-street operations for DPE enforcement and processing in-house, given that they already have established in-house operations for both. This leaves open the option to contract out. Contracting out would only be considered if it was felt to be more economical than in-house operations. Therefore, subsequently taking this option should not change the outcome regarding financial viability derived from an analysis of in-house operations.

4. DPE OPERATIONS

4.1 Existing restrictions and enforcement

- 4.1.1 Table 4.1 shows there are some 522kms of highway in Wyre Forest. Of this some 81km of kerb length is subject to restrictions and parking place orders which require enforcement

TABLE 4.1: CLASSIFICATION OF WYRE FOREST'S HIGHWAY NETWORK

Road category	Kms
A roads	68
B roads	36
C roads	119
Unclassified	299
Total network	522
Regulated kerb length *	81

*Data extracted from WCC's Inventory of Road Markings
Source: Worcestershire County Council (WCC)

- 4.1.2 Some restrictions apply "at any time" which means 24 hours each day for seven days per week. Other restrictions apply for part of the week or at specific times to address specific problems. Consideration could be given to rationalising these across Wyre Forest to help with public awareness/understanding.
- 4.1.3 The on-street waiting and loading controls are enforced by West Mercia Police with the Police issuing Fixed Penalty Notices (FPNs) in relation to waiting or parking place contraventions.
- 4.1.4 In the course of the Parking Review CB was informed by a representative of the Chief Constable of West Mercia Police that three (subsequently reduced to two) Traffic Wardens were employed to cover North Worcestershire which includes Wyre Forest, Bromsgrove, Redditch and surrounding areas. In terms of allocation of resources the Wardens were utilised on a priority basis.
- 4.1.5 The Police stated that the existing resources were not sufficient to adequately enforce the existing TROs. However where safety and/or congestion issues related to parking are evident then the Police will deal with these. The Police representative also stated that enforcement is made more difficult by the fact that the on-street signs and lines often do not match the published TROs.
- 4.1.6 The Police stated that it is their intention not to actively employ any further traffic wardens and the Chief Constable is keen for local authorities to assume responsibility for on-street parking enforcement.
- 4.1.7 CB has contacted West Mercia Police as part of this study and discussions reveal that the comments received from the earlier consultation remain.

- 4.1.8 CB's report "Wyre Forest Parking Review" (February 2004) highlighted the potential scale of non-compliance, concluding

"It appears from observations on the surveys that the town centres are suffering from the lack of Traffic Warden enforcement. Many vehicles were observed parked in contravention of regulations over extended periods.....A reasonable enforcement presence would result in a rapid modification of this type of parking behaviour and increased compliance with the parking regulations".

4.2 Requirements for on-street enforcement

- 4.2.1 The lengths of different types of parking regulation in the authority area have been analysed to estimate the number of parking attendants required. This data has been analysed by both restriction type (Table 4.2) and by location (Table 4.3) using the following broad area categorisations:

- Main towns: Kidderminster, Stourport and Bewdley
- Other areas/district centres: Remaining settlements of Blakedown, Clows, Cookley, Hartlebury, Lower Broadheath, Shatterford, Stone, Upper Arley, Wolverley

- 4.2.2 By relating the length of regulations to be patrolled with the predicted speed of enforcement and the frequency of patrols required, which varies according to the type of restriction being enforced and its location, we can estimate the total enforcement time required.

TABLE 4.2: TYPE OF REGULATIONS - APPROXIMATE KERB LENGTH (METRES)

Type	Main towns	Other areas	Total
Clearways	18,902		18,902
Double yellow lines	43,440	5,414	48,854
Single yellow lines	10,001	35	10,036
Limited waiting	2,027	571	2,598
Disable parking	182		
Total	74,552	6,020	80,572

Source: Data extracted from Worcestershire County Council's Inventory of Road Markings

TABLE 4.3: LENGTH OF REGULATION BY LOCATION - APPROXIMATE KERB LENGTH (METRES)

Town	Main	Other
Bewdley	13739	
Blakedown		958
Clows		80
Cookley		1940
Hartlebury		60
Kidderminster	48086	
Lower Broadheath		28
Shatterford		35
Stone		458
Stourport	12726	
Upper Arley		1171
Wolverley		1290
Grand Total	74551	6020

Source: Data extracted from Worcestershire County Council's Inventory of Road Markings

- 4.2.3 Following the implementation of decriminalised parking control the authority will be obliged to enforce all parking regulations and restrictions within its boundary. This obligation includes providing enforcement cover for 24 hours a day seven days a week for "at any time" restrictions. However, enforcement is expected to be concentrated primarily at the normal (or core) hours of operation, i.e. Monday to Saturday 8am to 6pm. At this stage it has been assumed that any special events, early morning or evening enforcement requirements would be minimal, and would be undertaken on an ad hoc basis as required within the standard resources estimated. The financial appraisal has included an element of overtime to cover for this.
- 4.2.4 The frequency of enforcement assumed for different types of regulation is set out in Appendix 6.
- 4.2.5 In order to calculate the number of Parking Attendants required, patrol speeds derived from surveys and knowledge of other DPE operations were used – this takes into account time required to check vehicles e.g. P&D tickets, permits and note registration plates. At yellow lines the Parking Attendants will usually be able to monitor greater lengths of restriction in a given time as there is usually a much lower density of parked vehicles to check and some streets can be checked as clear from a junction.
- 4.2.6 The average kerb length covered by an attendant is typically some 10 km per patrol day. Mobile patrols can typically cover some 50 km per patrol day. A patrol day assumes six hours active enforcement out of the 7.5 hours worked - this allows for travel to site, admin, breaks etc. An additional 15-20% is usually included in PA requirements to cover leave, sickness, training etc.
- 4.2.7 The estimated on-street PA numbers and PCNs issued are summarised in Table 4.4.

TABLE 4.4: ESTIMATED ON-STREET PA NUMBERS AND PCN ISSUED

All Year	Main towns	Other areas	Total
Enforcement hours required per week	262.3	2.6	264.9
Employed PAs	10.8	0.1	10.9
Deployed PAs	7.2	0.1	7.3
Estimated PCNs/PA/day	8	1	9
Average PCNs issued / week	346	1	347
Annual PCNs	17992	52	18044

Note: Employed PAs represents the number required to achieve the number of PAs deployed taking account of absence, holidays, illness and shift working.

- 4.2.8 It is difficult to prescribe exact enforcement requirements without more detailed knowledge of current and future parking activity and illegality levels. Any estimate will also need to be adjusted following commencement of operations, as parking behaviour will change with enforcement. While an approximate visit frequency can be used as a starting point, it is more difficult to estimate the coverage by a PA per hour, as this depends heavily on the number of vehicles parked per kilometre and type of restriction.
- 4.2.9 Subject to these reservations, the estimated total time required to enforce the restrictions in each area is a reasonable basis for estimating the PA resources required. The simple process of dividing the total enforcement hours required by the effective enforcement hours of each PA provides the number of deployed enforcement staff required. Allowance must then be made for an absence factor comprising annual leave, sickness, training and non-enforcement duties to derive the number of PAs that will need to be employed to maintain the required deployed force.
- 4.2.10 Given the number of PAs that will need to be deployed in the relevant areas we can consider the likely number of PCNs that will be issued on an average day based on "issue rates" per PA experienced elsewhere. This enables a projection to be made of the PCN annual volumes arising.

4.3 Off-street enforcement

- 4.3.1 Off-street car parks are enforced by the Authority's five full time Parking Attendants who issue Excess Charge Notices (ECNs) in relation to contraventions at a cost of £30.00. The Profit and Loss Accounts show an income of £25,000 (2004/2005) equating to some 800 issues per annum. CB are informed that around 2,000 ECNs are issued and around 50% are written off.
- 4.3.2 Table 4.5 details the existing off -street parking provision and current annual ECNs issued.

TABLE 4.5: OFF-STREET CAR PARKS

Free car park spaces	122
Charged car parks:	
Long-stay spaces	1,414
Medium-stay spaces	588
Medium/Long-stay spaces	656
Short-stay spaces	189
Total charged spaces	2,847
Annual ECN income	£25,000
ECN issues	2,000

4.3.3 It is assumed that over time the deployment in off-street car parks has been matched to the enforcement requirements and it is unlikely that there will be any need to initially change the levels of enforcement off-street under DPE. This position will need to be monitored post-implementation if there is a significant shift from on-street to off-street parking.

4.3.4 It is proposed that under DPE attendants would be deployed as a single force. This helps ensure a consistent approach to enforcement and secures efficiency gains by incorporating on-street enforcement between off-street car parks around the town.

4.4 Operational summary

4.4.1 It is recommended that the enforcement resources be deployed as a combined unit covering both on and off-street. The authority currently has enforcement and notice processing functions that can be expanded to cover the additional workloads required under DPE.

4.4.2 Tables 4.6 and 4.7 detail the establishment after DPE that it is estimated will be required along with the details of the current notice levels and the PCN projection used with the financial appraisal. Further discussion is required with the Council officers to understand more fully the current operations and to define more accurately the DPE establishment.

TABLE 4.6: ESTABLISHMENT - ESTIMATED REQUIREMENTS FOR ADDITIONAL STAFF

Establishment	Additional required
Parking Manager	0 ¹
Assistant Manager	1
Senior Parking Attendants	1
Parking Attendants	11
Admin. Assts. Processing	3
Total additional establishment	16

¹ Salary increase allowed for

TABLE 4.7: PCN VOLUMES

	Current notices	Estimated additions	PCN volumes
On-street – Notices (Police FPNs)	Not known	18044	18044
Off-street – Notices (Authority ECNs)	2000	0	2000
Total			20004

4.4.3 For comparative purposes current Parking Attendant numbers and PCN issue rates at some non-London decriminalised parking enforcement operations are shown in Table 4.8.

TABLE 4.8: COMPARATIVE PCN ISSUE RATES

Town	Population	No. PA's	PCNs issued	PCN per day⁽²⁾
Maidstone	140,000	14	27,000	9 per PA
Oxford	140,000	24	40-50,000	8-9 per PA
Luton	180,000	25	37,500 ⁽¹⁾	7 per PA
Portsmouth	175,000	45	48,000	4 per PA
Edinburgh	400,000	65 ⁽³⁾	220,000	15 per PA

(1) Mid point between 35,000 and 40,000.

(2) Assumes 220 working days per PA per year

(3) Estimate- actual depends on staff turnover

4.4.4 It can be seen from the above that the rates of PCN issue per PA included within the assumptions for Wyre Forest are reasonable in comparison with those achieved in other authorities. Although not included within the financial appraisal, it is likely that the first few months of DPE will give rise to higher than expected PCN issue rates until parking behaviour modifies and compliance with regulations improves. The rates projected here are those considered to be sustainable under a balanced regime of enforcement and on-going levels of non-compliant parking behaviour.

4.5 Special events

4.5.1 Special events can cover a variety of situations when DPE enforcement is required. However these events can only be enforced by PAs when the necessary legal powers apply i.e. the statute used must have been specifically referred to in the Designation Order laid before Parliament, and the relevant event must have been covered by a traffic regulation order issued under this statute. This can include:

- Football matches;
- Smaller sporting events such as rugby matches, tournaments;
- Special occasions such as marches, processions;
- Some road works and temporary restrictions;

- Other potential requirements for e.g. statutory undertakers, furniture removals etc.
- 4.5.2 If all temporary restrictions are to be included in DPE, this can add significantly to the cost of preparing relevant TROs, managing the required resources and enforcing them. Most event enforcement does not generate sufficient income to cover the costs. A 10% overtime estimate has been included in the Financial Appraisal to cover for additional enforcement activity related to such events. It is assumed that traffic control and the removal of vehicles causing an obstruction will remain the responsibility of the West Mercia Police.
- 4.5.3 Another potential resource issue is dispensations. If a formal system of giving written dispensations to traders etc. is used, this can add considerably to the resources required. An alternative would be to allow an element of Parking Management discretion rather than introducing written dispensations. It might be appropriate to use this initially and review it at a later stage.

4.6 Parking organisation

- 4.6.1 There are a number of other parking functions that could be amalgamated with parking processing and enforcement. They include:
- Traffic Regulation Order (TRO) making and maintenance. This could use the same software as the processing unit, and would allow constant interaction between the people responsible for developing TROs and those enforcing them.
 - Requests for bay suspensions could also be included in the operation
 - Public Interface ('Parking Shop') – it is advantageous to have an easy access point for the public where all parking related requirements can be catered for e.g. the issuing of parking permits, the issuing of parking season tickets, and the issuing of dispensations (if used). It also provides a location to deal with public complaints about penalties, receipt of representations and PCN payments.
 - Signs, road markings and machine maintenance – faults can be reported by PAs (possibly on the same software system as maintenance technicians) and information on rectifications, signs and line quality (when challenged) and machine faults can be exchanged with the processing unit.
 - Cash collection and bay suspension operations

5. BUSINESS PLAN

5.1 Financial evaluation

- 5.1.1 The financial impact of DPE has been evaluated for a base case that reflects CB's 'best estimates' of revenues, operational costs and start-up costs. However given the uncertainties in these estimates and the financial risks implied by such uncertainties the impact of costs being higher than estimated or revenues being lower has also been explored.
- 5.1.2 Section 5.2 discusses the estimation of DPE costs while revenues are discussed in 5.3. The base case financial evaluation is summarised in 5.4. The sensitivity of the forecast evaluation to variation in costs or revenues is considered in 5.5.

5.2 Costs

- 5.2.1 The following have been considered:

a) Operational costs:

- Additional staffing costs for enforcement and notice processing
- Additional processing costs for increased volumes of notices
- Adjudication costs and debt registration fees

b) Start-up costs:

- Switching from manual notice issue to Hand Held Computers
- Training/re-training of enforcement and notice processing staff
- Upgrade of notice processing systems to PCN from ECN
- TRO review, TRO modifications and line and sign rectification work
- Changing bilingual P&D information plates
- TRO management / access by GIS
- Publicity campaign costs
- Consultancy support for implementation
- 10% contingency for additional costs

- 5.2.2 The start-up costs include both the initial start-up costs, as detailed above, and the operational start-up costs, which have been estimated as one twelfth of the estimated annual operational costs. This latter sum is intended to cover the period before DPE goes live when salary and other expenses will be incurred while training and preparing for live operations.
- 5.2.3 Staff costs are of course the principal element of annual operating costs. The additional staff costs due to DPE need more detailed analysis particularly in terms of the potential economies to be gained through integration with off-street enforcement operations. We have assumed an additional three administrative staff to deal with the processing which would include: letters, telephone calls, dealing with representations, payment processing etc. (see Table 4.6). After the introduction of DPE prosecutions for non-payment of ECNs is no longer applicable. All debt collection will be handled by the PCN processing team and there should be no requirement for legal department resources, other than for processing TROs which would already be part of their normal activity.
- 5.2.4 Calculations relating to salaries and staff structure are based on information provided by and in consultation with WFDC officers. All costs associated with staffing are additional to existing costs. It is assumed that normal work shifts will cover the enforcement of daytime restrictions. Outside of these hours enforcement of 'at any time' restrictions would only be carried out in exceptional circumstances with a view to tackling specific problems. The costs of this are covered in the financial evaluation by a 10% overtime allowance for enforcement staff
- 5.2.5 The potential impacts of TUPE are not included within the calculations – which can have a significant impact on the rates for parking attendants. The Police have stated that although the staff transfer under TUPE can be complicated they are still in favour of DPE. The letter identifies the alternative of offering Wardens redeployment within West Mercia Police.
- 5.2.6 Further details on the cost inputs can be found in Appendix 6 together with a summary of some of the key assumptions behind the base case figures.

Other cost considerations

- 5.2.7 It is CB's view, based on the current operations, that clamping and removal measures will not be necessary in Wyre Forest from the outset of DPE. It may however be worth considering including these powers within the application to the Secretary of State so that it would be possible to introduce these measures in the future if they did become necessary.
- 5.2.8 Clamping and removing operations are very expensive measures, given the high capital costs of introduction and the high operational costs. Most authorities outside of London and major cities have not found it necessary to introduce such measures and it is CB's view that they will not be required within Wyre Forest for the foreseeable future.

5.3 Revenue

5.3.1 Factors that are critical to the estimation of revenues from DPE are:

- The number of PCNs issued
- The PCN value adopted
- The PCN recovery rate – that is the proportion of those issued that are paid and the proportions paid at full and discount rates

PCN issue rate

5.3.2 The PCN issue rate has been discussed above and is assumed to be eight per PA per day for the base case financial appraisal. This figure is based on experience elsewhere.

PCN value

- 5.3.3 The PCN value can be set at the rates approved by the Secretary of State from time to time. In 2001 these were increased to the current bands of £40, £50 and £60. Authorities are advised through the DfT Guidance to select the lowest band which is consistent with securing a high level of compliance and with attempting to meet the objective of producing a system of decriminalised parking enforcement which becomes self-financing as soon as practicable. On this basis it is CB's recommendation that WFDC should select the £60 band, discounted to £30 for payment within 14 days. Although sensitivity analyses indicate that a small operational surplus may generated from the £50 band, with this rate it would take just short of 30 years to recover the start-up costs.
- 5.3.4 From discussions with the DfT and National Adjudication Service for England & Wales CB has established that some 75% of authorities outside of London that have decriminalised have gone for the £60 rate and those currently considering decriminalisation have applied for the £60 band.
- 5.3.5 Consideration could be given to applying to use two bands with the PCN value being dependent on the seriousness of the contravention committed. For example, over-staying for less than one hour in a charged or limited waiting parking place could be considered a lesser contravention than parking on a no waiting restriction. As far as CB is aware, there are no DPE authorities with this type of differential PCN value.

PCN recovery rate

- 5.3.6 The estimates of revenue collected from PCNs issued takes account of unpaid PCNs, assumed to be 28% of all issues. These arise from cancellations, failures to trace vehicle owners, write-offs of non-collectable PCNs (foreign vehicles) etc. Although a non-recovery rate of 30% is currently experienced by WFDC with ECNs issued in the off-street car parks a higher rate of recovery is typical of existing DPE operations and there is no reason to expect Wyre Forest to be untypical. The 28% non-recovery rate is based on experience elsewhere (Table 5.1) and is therefore considered the appropriate base assumption.
- 5.3.7 Of the 72% of PCNs paid, we have assumed this comprises 60% being paid at the discounted rate, 8% at the face value and 4% at the incremented rate. This results in an average collection from each PCN issued of £26.40. A comparison of these assumptions to results from other authorities is set out in Table 5.1.
- 5.3.8 Revenues are initially based on the estimated total number of PCNs issued on-street and in the off-street car parks. However, WFDC is currently issuing ECNs that already give rise to revenue. This is deducted from the PCN revenue so that only the net increase from undertaking DPE is considered.

TABLE 5.1: PCN RECOVERY RATES

PCN stages	London DPE Average ***	Mature London DPE Operation*	Outside London**	Edinburgh %
Discounted ticket (50% of value in DPE)	45%	62%	60%	53%
Full (100%)	15%	12%	8%	15%
Charge Certificate (150%)	5%	6%	4%	5%
Non-recovery	35%	20%	28%	29%****
Average PCN Income		£20.80 (£40 PCN)	£26.40 (£60 PCN)	£28.05 (£60 PCN)

* LB of Wandsworth – ‘mature’ efficient operation

** Recent DPE authority

*** DTLR guidance

**** Includes cancelled and warning notices.

Other revenue considerations

- 5.3.9 Many authorities that have taken on DPE have seen improvements in on-street compliance with the parking regulations. Some of the previously illegally parked vehicles have been displaced into off-street car parks and, where these are owned by the local authority, this has given rise to increased parking revenues of up to 7%. Given the evidence of non-compliant on-street parking identified on the compliance surveys undertaken as part of an earlier study it is felt that the potential increase in parking revenues could be more than 7%. This potential additional revenue has not been taken into account in the financial appraisal.

- 5.3.10 ECNs issued in off-street car parks are subject to VAT as they are deemed to represent an additional parking charge by the Customs and Excise. PCNs issued in off-street car parks under DPE are deemed to be a penalty and are therefore not subject to VAT. Where a PCN replaces an off-street ECN, a greater proportion of the revenue received will now go towards income for the authority.
- 5.3.11 Finally, off-street parking revenues are normally fully accounted for as a contribution to the General Fund. It is therefore unlikely that funds can be found from this source to finance DPE without any changes. If charging policy is expected to support the objectives of the transport strategy, it would seem appropriate to use a proportion of any increases to support more effective enforcement.

5.4 Financial evaluation for the base case

- 5.4.1 The base case financial evaluation is shown in Table 5.2. It shows that with each parking attendant assumed to issue eight PCNs per day in the three main towns, just over 2,000 PCNs are estimated to be issued a year, which yields an estimated annual operating surplus of around £96,000. The cash flow summary shows that by the end of Year 3 the accumulated annual operating surpluses will have been sufficient to have recovered the total start-up costs the initial investment to implement DPE.
- 5.4.2 This base case is not an 'optimistic' assessment. It is a prudent assessment erring on the cautious side where appropriate. CB would also make the following points:
- The calculations of PCNs issued within the base case reflect expectations once the scheme has "bedded in" and driver behaviour has adjusted to the new enforcement regime. PCN issue rates prior to this may be higher or lower depending on the initial enforcement regime.
 - The costs in the base case are additional to existing costs
 - The calculations do not take into account future inflation - cost inflation may erode net revenues to an extent if PCN charges are not adjusted upwards regularly
 - If the financial outcomes are found over time not to match up to predictions then enforcement and processing resources can be adjusted accordingly.
 - The information on parking restrictions gained from the County Council and used in the model may not be 100% accurate and errors in this data may impact positively or negatively on the financial evaluation

TABLE 5.2: SUMMARY OF THE BASE CASE FINANCIAL APPRAISAL OF DPE OPERATION

PCN issue rate Main towns	8
PCN issue rate-Out-lying areas	1
PCN Rate	£60

Estimate of PCNs issued	20,044
Payment rates	
Unpaid	28%
Discounted	60%
Face value	8%
Incremented	4%
Average revenue per PCN	£26
Revenue (£000s)	
PCN revenue	£529,162
Less current ECN income	£25,000
Additional revenue	£504,162
Additional operational costs	£407,842
Operational surplus	£96,320
Start-up costs	
Enforcement (excluding IT)	£34,400
Notice processing (excluding IT)	£11,608
Systems & IT equipment	£21,205
General - signs & lines	£74,600
General - publicity	£5,000
General - consultancy	£25,000
General – other	£4,500
Capital start-up contingency	£17,631
Total start-up costs	£193,944
Cash flow summary	
Capital start up costs	£193,944
Operational start-up costs (1 month)	£33,987
Total start-up costs	£227,931
Year end balance 1st Year end	-£131,611
Year end balance 2nd Year end	-£35,291
Year end balance 3 rd Year end	£61,029
Year end balance 4 th Year end	£157,349
Year end balance 5 th Year end	£253,669

5.5 Sensitivity tests

5.5.1 The sensitivity of the projected annual operating surplus has been tested for:

- Operating costs being 15% higher than estimated in the base case – this reduces the annual operating surplus to £35,000 and increases the 'pay back period' (the time required to recoup implementation costs) to seven years
- A lower PCN issue rate of six PCN per attendant per day – this produces an annual operating deficit of around £12,400
- Costs being 15% higher and PCN issue rates reduced to six per PA per day – under this scenario there would be an estimated annual deficit of some £72,200

6. CONSULTATION

6.1 Changes for staff with DPE

- 6.1.1 One of the main groups affected by DPE are the existing enforcement and processing staff in the Council and the Police, and it is important to involve them in any consultation on a proposed DPE operation. In the vast majority of cases DPE has led to an increase in employment and a higher level of financial resources for such things as training, and equipment, and the integration of operations has generally been achieved without significant problems.

6.2 Changes for the public with DPE

- 6.2.1 For the public the main changes will be:
- The switch from traffic wardens to PAs and possible changes in enforcement attitudes and procedures
 - A higher level of enforcement on yellow lines
 - Changes in fine values
 - Different contact points for payments, queries
 - Different procedures – representations, appeals, debt collection; and
 - Payment by debit/credit card.
- 6.2.2 These differences will need to be clearly explained to the public.
- 6.2.3 It is also essential that the change to the TROs for DPE and the PCN rate are advertised prior to the DPE commencement date. Failure to do this could result in all PCNs issued being invalid and the authority having to refund any penalties collected.

6.3 Consultation strategy

- 6.3.1 The reasons behind the move to DPE need to be clearly explained in the context of WFDC's overall strategy and the transport strategy in particular. It is preferable to control the agenda and debate over DPE where this is possible by using a proactive consultation strategy.
- 6.3.2 There are three basic elements to a consultation strategy:

- Internal communications within the Council – ensuring that all Council officers and public interfaces are aware of the new arrangements and the reasons for them
- Political communication – ensuring that elected members understand the reasons for the change and the processes involved – of particular importance is the appeals procedures
- External communication and consultation – with the general public and interest groups

6.3.3 Authorities have adopted many different approaches to communicating the change to DPE, including the following examples:

- Local radio interviews
- Local press advertising
- Distribution of leaflets to local residences and businesses
- Bill-board and bus advertising
- Entry signs notifying motorists of move to DPE
- A pre-live distribution of warning notices to vehicles parked in contravention over a period of say two weeks (this can be an integral part of the PA training)

6.3.4 It is recommended that specific planning on the extent and approach of publicity will be required during the implementation phase.

7. SUMMARY AND RECOMMENDATIONS

7.1 Overview

7.1.1 This report has:

- Detailed the general principles, legal issues and requirements of DPE
- Outlined the key features and potential consequences of DPE
- Outlined key features of the existing situation
- Evaluated a potential DPE enforcement and processing operation
- Provided an initial estimate of a potential Business Plan, which concludes that an operating surplus can be achieved from a DPE regime across the district
- Outlined the consultation requirements for DPE

7.2 General principles

7.2.1 The Road Traffic Act 1991 (RTA 1991) permits the decriminalisation of most non-endorsable parking offences for specific areas in the UK.

7.2.2 The benefits of this is that it allows local authorities to ensure that parking policies are effectively implemented and enforced, with consequent benefits in improvements in traffic and public transport flow, road safety, use of parking spaces, environmental benefits and possible financial benefits.

7.3 DPE options

7.3.1 CB has identified four options for DPE:

- All activities in-house
- Processing in-house, enforcement contracted out
- Enforcement in-house, processing contracted out
- All activities contracted out

7.3.2 CB has assumed that WFDC will initially consider expanding its existing operations for DPE enforcement and processing in-house, given that they already have established in-house operations for both.

7.4 Existing operations

- 7.4.1 There are some 522 kms of highway network in the district, of which 81 km of kerb length is subject to parking restrictions. The enforcement of on-street parking regulations is carried out by the Police/Traffic Warden service. However parking enforcement is no longer a core policing issue.
- 7.4.2 Off-street enforcement is carried out by WFDC. The Council's parking team monitors 122 free and 2847 pay and display spaces, and issues around 2000 ECNs a year of which approximately 50% are written off.

7.5 On-street enforcement under DPE

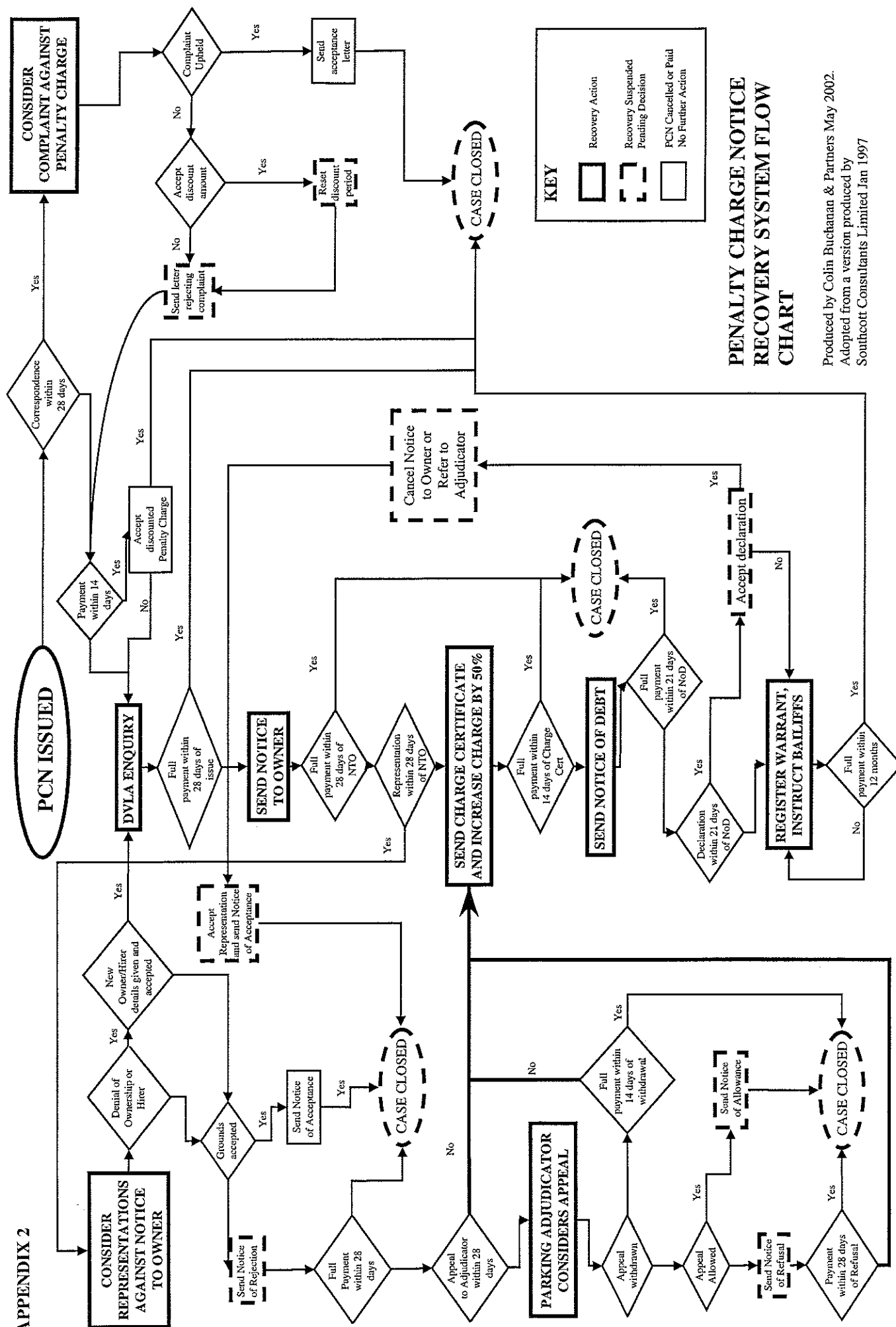
- 7.5.1 The number of additional Parking Attendants required for DPE has been calculated from the length of regulations to be patrolled, predicted speeds of enforcement and the frequency of patrols required. Thus it is estimated that an additional 16 staff will be required and that in a full year that staff will issue an estimated 18044 on-street PCNs.
- 7.5.2 It has been assumed that the existing off-street deployment would remain at the current levels.
- 7.5.3 It is recommended that the enforcement resources be deployed as a combined unit covering both on- and off-street operations. The authority currently has enforcement and notice processing functions that can be expanded to cover the additional workloads required under DPE.

7.6 Financial summary

- 7.6.1 Based on CB's recommendation that WFDC selects the £60 PCN band, discounted to £30 for payment within 14 days, the base case financial analysis shows that DPE will generate an annual operating surplus and that the period taken to recover the start-up costs would be less than three years. This suggests WFDC should be able to operate DPE, given the current assumptions, and cover its costs by income generated.
- 7.6.2 Sensitivity tests indicate that if operating costs were 15% higher than estimated then an annual surplus would still be generated. However if the assumed PCN issue rate of eight per parking attendant per day fell to six per day, then an annual operating deficit is predicted the scheme would not be financially viable.
- 7.6.3 Some of the costs input to this analysis require further examination in discussion with the Council's current Parking Manager. This will permit a more accurate estimate of net staff and accommodation costs.

7.7 Conclusion

- 7.7.1 The report has not identified any significant barriers to the introduction of DPE in Wyre Forest although there is always some element of financial risk in developing such an operation.
- 7.7.2 There are many advantages in having a combined enforcement team for both on and off-street in a Council DPE operation. This enables traffic regulation and management to be closely related to enforcement, bringing together different elements of current Council and Police operations in an integrated way, and providing resources for a well-equipped and trained enforcement operation. Elsewhere DPE has generally worked well and has enabled more effective achievement of transportation objectives.
- 7.7.3 In conclusion, it is considered that DPE is feasible and financially viable for the district, albeit with an element of risk. At this stage the authority should consider the question as to whether or not to proceed to implementation. If there is a decision to proceed, a project steering group should be appointed to take the decisions required throughout implementation. That steering group should determine the detailed programme for implementation and the earliest possible target live date that can be achieved. They should consult widely before finalising the target date given the practical, economic and political considerations that may have a bearing on the date selected.



APPENDIX 3

DPE Application Requirements (As per LA Circular 1/95)

1. Information on whether the application is for a SPA, a PPA or both
2. Proposed Commencement date
3. Area of application including any excluded roads
4. Evidence of a review of parking policies
5. Confirmation that TRO's, signs and lines and equipment will be converted by commencement to accord with the new regime
6. Details of the proposed level of PCN's
7. Financial evaluation
8. Review of exemptions, dispensations etc.
9. Correspondence with police and other authorities where relevant
10. Details of enforcement operation
11. Confirmation that suitable documentation will be used
12. Confirmation that standard contravention codes will be used
13. Description of payment facilities for motorists
14. Details of Processing arrangements and liaison with the DVLA
15. Details of adjudication process
16. Confirmation that nationally required statistics will be kept

APPENDIX 5

SPAs Operating in England & Wales

Authority	Start Date	Enforcement	Processing	IT
ENGLAND:				
Winchester	May 1996	In-house	In-house	Compex
Oxford	Feb 1997	Control Plus	Control Plus	Civica
High Wycombe	Mar 1997	Vinci Park	Vinci Park	Compex
Maidstone	Sep 1997	In-house	In-house	Civica
Watford	Oct 1997	Vinci Park	Vinci Park	Compex
Luton	Jan 1999	In-house	In-house	Civica
Manchester	Apr 1999	Control Plus	Control Plus	Civica
Portsmouth	Apr 1999	In-house	In-house	Compex
Hastings	May 1999	In-house	In-house	Langdale
Cantebury	Jan 2000	In-house	In-house	Langdale
Gravesham	Jan 2000	In-house	In-house	Civica
Medway	Jan 2000	In-house	In-house	Langdale
Sevenoaks	Jan 2000	In-house	In-house	Langdale
Swale	Jan 2000	In-house	In-house	Langdale
Thanet	Jan 2000	In-house	In-house	Langdale
Tunbridge Wells	Jan 2000	In-house	In-house	Langdale
Sefton	Feb 2000	Legion	In-house	Compex
Bristol	Apr 2000	In-house	In-house	Spur
Sandwell	Apr 2000	Vinci Park	Vinci Park	Compex
Shepway	Apr 2000	In-house	In-house	Langdale
Bolton	Sep 2000	APCOA	In-house	Langdale
Tonbridge & Malling	Sep 2000	In-house	In-house	Langdale
Ashford	Oct 2000	In-house	In-house	Langdale
Reading	Oct 2000	Vinci Park	Vinci Park	Langdale
York	Oct 2000	In-house	In-house	Langdale
Bedford	Nov 2000	In-house	In-house	Langdale
Dover	Jan 2001	In-house	In-house	Langdale
Trafford	Jan 2001	NCP	In-house	Langdale
Taunton Deane	Feb 2001	In-house	In-house	In-house
Plymouth	Apr 2001	In-house	In-house	Langdale
Salford	Apr 2001	Control Plus	Control Plus	Civica
Salisbury	Apr 2001	In-house	In-house	Compex
Brighton & Hove	Jul 2001	NCP	In-house/NCP	Civica
Dartford	Jul 2001	In-house	In-house	Langdale

APPENDIX 4

The details below were provided to Colin Buchanan and Partners by the NPAS in July 2002. NPAS noted that since the handout was written, Executive Arrangements have come into force, which has radically altered most council's committee structures. In councils which have adopted Executive Arrangements the Member, or Deputy Member, does not have to be a member of the Cabinet, although in all cases there will need to be a clear line of authority (possibly delegated), leading to the choice of Member to serve on the NPAS Joint Committee.

How the National Parking Adjudication Service Joint Committee was established

The National Parking Adjudication Service Joint Committee (NPASJC) has been established to enable constituent Councils to exercise their functions appointing Adjudicators, etc. under Section 73 of the Road Traffic Act 1991. These functions are exercised jointly with the other NPASJC councils in accordance with the requirements of the Order designating their council to be a Special Parking Area/Permitted Parking Area.

The object of the NPASJC is to provide a national Joint Committee of Councils having SPA/PPA areas for the purpose of appointing independent adjudicators as a Tribunal to provide fair, consistent and equitable adjudication for Appellants and Councils, in line with government advice contained in Circular 1/95, (Welsh Office Circular 26/95). Its remit is limited to these matters and it is not intended at this stage that the NPASJC should have a wider transportation/parking role.

Initially the arrangements were set up by Kent, Hampshire, Winchester and Manchester to fulfil a pressing need for independent adjudication within these areas. It has always been a primary objective that the arrangements made should be open to all other Councils who wish to participate and avail themselves of the national adjudication service and consultation took place with other Councils and the DETR (now DLTR) to achieve this aim.

The Agreement that regulates the setting up of the Joint Committee provides for one elected Member for each constituent Council. If the nominated Member cannot attend the meeting, provision is made for a named substitute to attend in his/her place. The Joint Committee is scheduled to meet at least twice a year although it has recently established an Executive Sub-Committee that means under normal circumstances it now need only meet annually in September. Meetings have been held in both Manchester and more recently in Birmingham.

The role of Members of the Joint Committee is to oversee the functions of NPAS as an Independent Tribunal. There is not a role as such in respect of the parking enforcement activities of the Local Authority they represent on the Joint Committee.

The Joint Committee has delegated decision making in relation to the majority of day to day matters to a "Lead Officer" (initially the Lead Officer is the Chief Executive of

APPENDIX 4

Manchester) or to the Chief Parking Adjudicator, depending on the subject matter. For the most part the NPAS Service Director acts on behalf of the "Lead Officer".

Except in the case of urgent business the Lead Officer, in exercising the functions delegated to him is required to consult with an officer working party (the Management Board) comprising officers currently nominated by the Councils of Birmingham, Hampshire, Winchester, Neath Port Talbot, Manchester and Kent.

A representative of the DTLR has been appointed a member of the Management Board.

Because the Joint Committee has no corporate status and cannot therefore contract, one of the constituent Councils has been appointed Lead Authority to enable goods and services to be provided on behalf of the Joint Committee. Initially Manchester has been appointed the Lead Authority.

The form of the NPASJC Agreement has been the subject of detailed negotiations between the initial parties, its final form has been approved by leading Counsel. For this reason it is requested that joining councils do not seek to make changes to the terms of the Agreement.

Whilst the Agreement provides for the terms on which the Joint Committee is to operate, including making provision for the joining of new members and for the appointment of a Lead Authority, it does not set out in detail the amount of contributions required from member councils. These contributions were decided by the Joint Committee at its first meeting and were set at a level which should not be prohibitive to any council wishing to join the Joint Committee. These charges will be reviewed annually by the Joint Committee at their January meeting.

The charges for year 2001/2 have been fixed at:

£0.70 per Penalty Charge Notice
£500.00 Annual Fee
£nil Case Charge

If you have a query which is of a general nature please contact:

Bob Tinsley
Service Director
National Parking Adjudication Service
Barlow House
Minshull Street
MANCHESTER
M1 3DZ

Tel: 0161 242 5270
Fax: 0161 242 5254
Email: btinsley@parking-adjudication.gov.uk

APPENDIX 5

Northampton	Jul 2001	In-house	In-house	Compex
Authority	Start Date	Enforcement	Processing	IT
ENGLAND: (cont.)				
Three Rivers	Jul 2001	Vinci Park	In-house	Compex
Barrow-in-Furness	Sep 2001	In-house	In-house	Compex
Birmingham	Sep 2001	Control Plus	In-house	Compex
Bournemouth	Sep 2001	In-house	In-house	Langdale
Southend-on-Sea	Sep 2001	Control Plus	In-house	Civica
Oldham	Oct 2001	Euro Car Parks	In-house	Traffic Support
Stoke-on-Trent	Oct 2001	In-house	In-house	Traffic Support
Carlisle	Nov 2001	In-house	In-house	Compex
Hereford	Nov 2001	In-house	In-house	Cinergic
Norwich	Feb 2001	In-house	In-house	Langdale
Milton Keynes	Mar 2002	Vinci Park	In-house	Compex
Southampton	Mar 2002	In-house	In-house	Langdale
South Lakeland	Mar 2002	In-house	In-house	Traffic Support
Poole	Apr 2002	In-house	In-house	Compex
WALES:				
Neath Port Talbot	Jun 1999	Vinci Park	Vinci Park	Compex

Source: PARKINGReview June 2002

Distribution of organisations carrying-out Enforcement, Processing and IT Supply in SPAs operating in England & Wales

Organisation	Enforcement		Processing		IT	
	No.	%	No.	%	No.	%
In-house	33	66%	41.5	83%	1	2%
Control Plus	5	10%	3	6%		
Vinci Park	7	14%	5	10%		
Legion	1	2%				
APCOA	1	2%				
NCP	2	4%	0.5	1%		
Euro Car parks	1	2%				
Compex					15	30%
Civica					8	16%
Langdale					21	42%
Spur					1	2%
Cinergic					1	2%
Traffic Support					3	6%
	50	100%	50	100%	50	100%

Source: CBP based on above data

APPENDIX 6: Assumptions and financial summary details

1. Patrol speeds

Patrol code / speed	PA speed mtrs/hr
Waiting restrictions	4,700
Waiting & loading restrictions	3,000
Permitted parking	1,400
Limited waiting	900
Other restrictions	4,700
Pay & display	1,400
Clearways	9,000
Mobile patrols	9,000

2. Staff salaries

Enforcement staffing	Additional No's	Salary (£)	Source
Assistant Manager	1	21,000	CBP/WFDC
Senior parking officer	1	14,500	CBP/WFDC
Parking Attendants (All Year)	11	10,668	WFDC
Processing staff	Additional No's	Salary	Source
Parking Manager	0	3,502 ⁱ	CBP
Admin. Assistants	3	13,000	CBP/WFDC
Total	16		

ⁱ Part salary of existing manager

APPENDIX 6: Assumptions and financial summary details

3. Financial summary details

Additional operating costs

Cost	£
<i>Enforcement</i>	
Additional enforcement staff salary costs sub total	192,018
NI and Superannuation (20%)	38,404
Total enforcement additional staff costs	230,422
Vehicle expenses	20,235
Radios	4,320
Uniforms	2,700
Training /recruitment	1,350
Premises/stationery/utilities	6,541
Total other enforcement costs sub total	35,146
Total enforcement operating costs	265,568
<i>Processing</i>	
Additional processing staff salary costs sub total	42,502
NI and Superannuation (20%)	8,500
Total processing staff salary costs	51,002
Office equipment	1,772
Admin costs (warrants/stationery/postage/appeals etc)	47,181
IT annual costs	17,447
Training/recruitment	2,500
Legal advice	3,000
Total other processing costs sub total	71,850
Total processing operating costs	122,853
Total additional operating costs sub total	388,421
External overhead (5%)	19,421
Total additional operating costs	407,842

Operation start up costs 1 month

Cost	£
Total additional operating costs	407,842
Divide by 12 months	
Operation start up costs 1 month	33,987

APPENDIX 6: Assumptions and financial summary details

Start up costs

Uniforms	5,400
Training	9,000
Premises fit-out	20,000
Enforcement sub total	34,400
Premises fit-out	5,000
Furniture, office equipment	6,608
Notice processing sub total	11,608
Services/implementation	2,605
Software	12,800
Hardware	5,800
Systems & IT sub total	21,205
TRO GIS mapping and data entry	15,100
Signs and lines review	20,000
TRO amendments / signing and lining rectification	39,500
General - signs & lines sub total	74,600
General - publicity sub total	5,000
General - consultancy sub total	25,000
General – other sub total	4,500
Total capital start up costs sub total	176,313
Capital start-up contingency sub total (10%)	17,631
Total capital start up costs	193,944

4. FREQUENCIES OF ENFORCEMENT

MONDAYS - SATURDAYS	DAYS	KEY URBAN AREAS		DISTRICT CENTRES	
		TIMES	UNIT	TIMES	UNIT
TYPE OF REGULATION					
CLEARWAY EXCL PUBLIC SERVICE VEHICLES	n/a	n/a	n/a	n/a	n/a
CLEARWAY 7AM-7PM EXCL PUBLIC SERVICE VEHICLES	n/a	n/a	n/a	n/a	n/a
CLEARWAY	n/a	n/a	n/a	n/a	n/a
LW 10 MINUTES NO RETURN WITHIN 1 HOUR	6	4	Day	6	Week
LW 30 MINUTES NO RETURN WITHIN 2 HOURS 8AM-6.30PM	6	4	Day	6	Week
LW 30 MINUTES NO RETURN WITHIN 30 MINUTES	6	4	Day	6	Week
LW 30 MINUTES NO RETURN WITHIN 30 MINUTES 7AM-7PM	6	4	Day	6	Week
LW 30 MINUTES NO RETURN WITHIN 30 MINUTES 8AM-6.30PM	6	4	Day	6	Week

APPENDIX 6: Assumptions and financial summary details

LW 30 MINUTES NO RETURN WITHIN 30 MINUTES MON-SAT 8AM-6.30PM	6	4	Day	6	Week
LW 45 MINUTES NO RETURN WITHIN 1 HOUR 8AM-6.30PM	6	4	Day	6	Week
LW 60 MINUTES NO RETURN WITHIN 1 HOUR 8AM-6.30PM	6	4	Day	6	Week
LW 60 MINUTES NO RETURN WITHIN 1 HOUR 8AM-6PM	6	4	Day	6	Week
LW 60 MINUTES NO RETURN WITHIN 1 HOUR MON-SAT 8AM-6.30PM	6	4	Day	6	Week
LW 60 MINUTES NO RETURN WITHIN 2 HOURS 8AM-4.30PM	6	4	Day	6	Week
LW 15 MINUTES NO RETURN WITHIN 2 HOURS	6	4	Day	6	Week
LW 60 MINUTES NO RETURN WITHIN 2 HOURS 8AM-6.30PM	6	4	Day	6	Week
LW 60 MINUTES NO RETURN WITHIN 2 HOURS 8AM-6PM	6	4	Day	6	Week
LW 8AM-6.30PM (NO DETAILS)	6	4	Day	6	Week
LW NO RETURN WITHIN 1 HOUR 8AM-6.30PM (NO DETAILS)	6	4	Day	6	Week
LW 15 MINUTES NO RETURN WITHIN 2 HOURS 8AM-6.30PM MON-SAT	6	4	Day	6	Week
LW 20 MINUTES NO RETURN WITHIN 2 HOURS 8AM-6.30PM	6	4	Day	6	Week
LW 30 MINUTES	6	4	Day	6	Week
LW 30 MINUTES NO RETURN WITHIN 1 HOUR	6	4	Day	6	Week
LW 30 MINUTES NO RETURN WITHIN 1 HOUR 7AM-7PM	5	4	Day	5	Week
LW 30 MINUTES NO RETURN WITHIN 1 HOUR 8AM-6.30PM	6	4	Day	6	Week
LW 30 MINUTES NO RETURN WITHIN 1 HOUR MON-SAT 8.30AM-6PM	6	4	Day	6	Week
NO WAITING AT ANY TIME	6	3	Day	3	Week
NW AT ANY TIME MON-SAT	6	3	Day	3	Week
NW MON-FRI 8AM-4.30PM	5	2	Day	3	Week
NW MON-SAT 8.30AM-6PM	6	2	Day	3	Week
NW MON-SAT 8AM-6.30PM	6	2	Day	3	Week
NW 4.30PM-6.30PM	6	2	Day	3	Week
NW 7AM-7PM	6	2	Day	3	Week
NW 8AM-6.30PM	6	2	Day	3	Week
NW 8AM-6.30PM MON-FRI	5	2	Day	3	Week
NW 8AM-6PM	5	2	Day	3	Week
NW 8AM-6PM MON-FRI	5	2	Day	3	Week
NW 8AM-8PM	6	2	Day	3	Week
NW 8PM-8AM	6	2	Day	3	Week
DISABLED PARKING	6	3	Day	6	Week
DISABLED PARKING 1 HOUR LIMIT	6	3	Day	6	Week
DISABLED PARKING MON-SAT 5.30PM-8.00AM UNLIMITED MON-SAT 8.00AM-5.30PM 3 hr NO RETURN 2HRS SUNDAY ANY TIME NO LIMIT	6	3	Day	6	Week
NO WAITING AT ANY TIME NO LOADING MON-FRI INCLUSIVE 8.00AM-9.30AM, 12.00AM-1.15PM & 3PM-3.45PM	2	3	Day	6	Week
NO WAITING LOADING OR UNLOADING 8AM-9AM AND 4.30PM-6PM MON-SAT INCLUSIVE	6	2	Day	6	Week
NW AT ANY TIME NO LOADING 7.30AM-9AM 4.30PM-6PM ON ANY DAY	6	2	Day	6	Week
NW MON-SUN 30MIN LOADING 10.30-5.30PM	6	2	Day	6	Week
NW NO LOADING 8AM-9AM 11AM-3PM 4.30PM-6PM	6	3	Day	3	Week
NW NO LOADING 8AM-9AM 4.30PM-6PM MON-SAT INCLUSIVE	6	2	Day	3	Week

SUNDAYS	-	KEY URBAN AREAS		OTHER AREAS	
		TIMES	UNIT	TIMES	UNIT
CLEARWAY EXCL PUBLIC SERVICE VEHICLES	n/a	n/a	n/a	n/a	n/a
CLEARWAY 7AM-7PM EXCL PUBLIC SERVICE VEHICLES	n/a	n/a	n/a	n/a	n/a
CLEARWAY	n/a	n/a	n/a	n/a	n/a
LW 10 MINUTES NO RETURN WITHIN 1 HOUR	1	2	Day	2	Fortnight
LW 30 MINUTES NO RETURN WITHIN 2 HOURS 8AM-6.30PM	1	2	Day	2	Fortnight
LW 30 MINUTES NO RETURN WITHIN 30 MINUTES	1	2	n/a	2	Fortnight
LW 30 MINUTES NO RETURN WITHIN 30 MINUTES 7AM-7PM	1	2	Day	2	Fortnight
LW 30 MINUTES NO RETURN WITHIN 30 MINUTES 8AM-6.30PM	1	2	n/a	2	Fortnight
LW 30 MINUTES NO RETURN WITHIN 30 MINUTES MON-SAT 8AM-6.30PM	n/a	n/a	n/a	n/a	n/a
LW 45 MINUTES NO RETURN WITHIN 1 HOUR 8AM-6.30PM	1	2	n/a	2	Fortnight

APPENDIX 6: Assumptions and financial summary details

LW 60 MINUTES NO RETURN WITHIN 1 HOUR 8AM-6.30PM	1	2	Day	2	Fortnight
LW 60 MINUTES NO RETURN WITHIN 1 HOUR 8AM-6.PM	1	2	Day	2	Fortnight
LW 60 MINUTES NO RETURN WITHIN 1 HOUR MON-SAT 8AM-6.30PM	n/a	n/a	n/a	n/a	n/a
LW 60 MINUTES NO RETURN WITHIN 2 HOURS 8AM-4.30PM	1	2	Day	2	Fortnight
LW 15 MINUTES NO RETURN WITHIN 2 HOURS	1	2	Day	2	Fortnight
LW 60 MINUTES NO RETURN WITHIN 2 HOURS 8AM-6.30PM	1	2	Day	2	Fortnight
LW 60 MINUTES NO RETURN WITHIN 2 HOURS 8AM-6.PM	1	2	Day	2	Fortnight
LW 8AM-6.30PM (NO DETAILS)	1	2	Day	2	Fortnight
LW NO RETURN WITHIN 1 HOUR 8AM-6.30PM (NO DETAILS)	1	2	Day	2	Fortnight
LW 15 MINUTES NO RETURN WITHIN 2 HOURS 8AM-6.30PM MON-SAT	n/a	n/a	n/a	n/a	n/a
LW 20 MINUTES NO RETURN WITHIN 2 HOURS 8AM-6.30PM	1	2	Day	2	Fortnight
LW 30 MINUTES	1	2	Day	2	Fortnight
LW 30 MINUTES NO RETURN WITHIN 1 HOUR	1	2	Day	2	Fortnight
LW 30 MINUTES NO RETURN WITHIN 1 HOUR 7AM-7PM	1	2	Day	2	Fortnight
LW 30 MINUTES NO RETURN WITHIN 1 HOUR 8AM-6.30PM	1	2	Day	2	Fortnight
LW 30 MINUTES NO RETURN WITHIN 1 HOUR MON-SAT 8.30AM-6PM	n/a	n/a	n/a	n/a	n/a
NO WAITING AT ANY TIME	1	1	Day	1	Fortnight
NW AT ANY TIME MON-SAT	n/a	n/a	n/a	n/a	n/a
NW MON-FRI 8AM-4.30PM	n/a	n/a	n/a	n/a	n/a
NW MON-SAT 8.30AM-6PM	n/a	n/a	n/a	n/a	n/a
NW MON-SAT 8AM-6.30PM	n/a	n/a	n/a	n/a	n/a
NW 4.30PM-6.30PM	1	1	Day	1	Fortnight
NW 7AM-7PM	1	1	Day	1	Fortnight
NW 8AM-6.30PM	1	1	Day	1	Fortnight
NW 8AM-6.30PM MON-FRI	n/a	n/a	n/a	n/a	n/a
NW 8AM-6PM	1	1	Day	1	Fortnight
NW 8AM-6PM MON-FRI	n/a	n/a	n/a	n/a	n/a
NW 8AM-8PM	1	1	Day	1	Fortnight
NW 8PM-8AM	1	1	Day	1	Fortnight
DISABLED PARKING	1	1	Day	1	Fortnight
DISABLED PARKING 1 HOUR LIMIT	1	1	Day	1	Fortnight
DISABLED PARKING MON-SAT 5.30PM-8.00AM UNLIMITED MON-SAT 8.00AM-5.30PM 3 hr NO RETURN 2HRS SUNDAY ANY TIME NO LIMIT	1	1	Day	1	Fortnight
NO WAITING AT ANY TIME NO LOADING MON-FRI INCLUSIVE 8.00AM-9.30AM, 12.00AM-1.15PM & 3PM-3.45PM	n/a	n/a	n/a	n/a	n/a
NO WAITING LOADING OR UNLOADING 8AM-9AM AND 4.30PM-6PM MON-SAT INCLUSIVE	n/a	n/a	n/a	n/a	n/a
NW AT ANY TIME NO LOADING 7.30AM-9AM 4.30PM-6PM ON ANY DAY	1	1	Day	1	Fortnight
NW MON-SUN 30MIN LOADING 10.30-5.30PM	1	1	Day	1	Fortnight
NW NO LOADING 8AM-9AM 11AM-3PM 4.30PM-6PM	1	1	Day	1	Fortnight
NW NO LOADING 8AM-9AM 4.30PM-6PM MON-SAT INCLUSIVE	n/a	n/a	n/a	n/a	n/a

