

# Highways and Transport Committee: Minutes

Date: 1 October 2024

Time: 10.00 a.m. to 1:25 p.m.

Venue: Red Kite Room, New Shire Hall

Present: Councillors Alex Beckett (Chair), Neil Shailer (Vice-Chair), Alex Bulat, Piers Coutts, Claire Daunton, Lorna Dupré, Jan French, Ian Gardener, Anne Hay, Bill Hunt, Simon King, Lucy Nethsingha, Tom Sanderson, and Alan Sharp

## 230. Apologies for Absence and Declarations of Interest

Apologies for absence were received from Councillors Gerri Bird (substituted by Councillor Bulat) and Peter McDonald.

Councillor King declared a non-statutory disclosable interest in Agenda Item 4 (Integrated Transport Block Funding Allocation 2025-26), as a member of Cambridgeshire Local Access Forum.

Councillor Bulat declared a non-statutory disclosable interest in Agenda Item 6 (Local Highway Improvement 2024-25 Programme), as a supporter of some Local Highway Improvement schemes in her division.

Councillor Daunton declared a non-statutory disclosable interest in Agenda Item 8 (St Ives and Fulbourn 20mph Zone and Speed Limit Schemes), as the local Member for the Fulbourn division.

## 231. Minutes – 23 July 2024

The minutes of the meeting held on 23 July 2024 were agreed as a correct record and signed by the Chair.

While reviewing the Minutes Action Log, it was confirmed that the session with town and parish councils, as referred to in Minute 211 (Minutes – 5 March 2024 and Action Log), would be scheduled for late October 2024 or early November 2024, before the Committee received an update on the prioritisation of future Highways investment at its meeting on 3 December 2024.

The Committee noted the Minutes Action Log.

## 232. Petitions and Public Questions

The Committee was informed that nine public questions had been accepted and that the questions would be taken at the start of the relevant agenda items. It was noted that two questions related to agenda item 5 (Procurement of Civil Parking Enforcement Services) and seven questions related to agenda item 8 (St Ives and Fulbourn 20mph Zone and Speed Limit Schemes). A further three public questions had not been accepted because they were not relevant to the agenda items of the meeting.

The Committee was informed that the Council had received a petition with 2779 signatures calling for a reconsideration of the 20mph zone in Ely, attached at Appendix 1 of the minutes, and the petitioner, Ms Anna Bailey, was invited to address the committee. Expressing concern about how the consultation on the scheme had been advertised and carried out, Ms Bailey argued that it did not have majority support of the local community, noting that a significantly greater number of people had signed the petition than had supported the proposed scheme during its consultation. Suggesting that there was insufficient evidence of the need for or the benefits of the proposals, she argued that the scheme should take into account recent guidance on 20mph schemes issued by the government. Expressing concern that the decision to implement the scheme had been taken as an officer delegated decision, rather than by the committee, she asked the Council to undertake a new consultation on the scheme. In response to questions from Members, Ms Bailey clarified that of the 195 responses to the statutory consultation on the proposals, 122 had supported the scheme, while 2779 people had signed the petition calling for the scheme to be reconsidered, which she suggested should be added to the committee's agenda plan. It was confirmed that a response to the petition from the Chair would be sent to the petitioner within ten working days.

## 233. Integrated Transport Block Funding Allocation 2025-26

The Committee received a report on the proposed allocation of £3.215m Integrated Transport Block (ITB) funding for 2025-26, subject to the funding being passed to the Council by the Cambridgeshire and Peterborough Combined Authority (CPCA).

While discussing the report, individual Members:

- Welcomed the proposed additional allocation of funding for minor improvements for accessibility, and highlighted the importance of ensuring residents were aware of the available support and how to apply for it. Members sought clarification on whether such funding could only be used for disabled parking spaces, or whether it could be used for other measures, such as dropped curbs, and queried how many applications for minor improvements for accessibility were received by the Council annually. **Action required**
- Welcomed the proposed additional allocation of funding for minor improvements to Public Rights of Way (PRoWs) and queried how it would affect the wider active travel programme and maintenance of PRoWs, as well as how the schemes would be selected for funding. It was clarified that the proposed additional funding would be for new capital projects and that there was a separate budget for the maintenance of PRoWs. It was agreed to provide Members with an update on how

the minor improvements interacted with the Council's wider active travel programme. **Action required**

- Highlighted the importance of community engagement in the process of designing minor improvements to PRowS, and it was confirmed that all such programmes went through various forms of consultation.
- Expressed concern about the proposal to allocate £200k for miscellaneous and contingency costs and £200k for major scheme development, arguing that such costs should be incorporated into individual projects' budgets to maintain transparency and accountability. It was confirmed that any unspent funding that had been allocated for such purposes would be reallocated to prioritised schemes.
- Suggested that any leftover resources from the ITB funding be allocated to already prioritised but currently unfunded Local Highway Improvement projects, noting that there were a large number of such schemes due to funding constraints.

It was resolved unanimously to:

- a) Approve the proposed allocation of the Integrated Transport Block funding for 2025-26, subject to the funding being passed to the County Council by the Cambridgeshire and Peterborough Combined Authority;
- b) Note changes in the funding allocations from previous years; and
- c) Delegate authority to the Executive Director of Place and Sustainability, in consultation with the Chair and Vice Chair of the Highways and Transport Committee, to re-allocate funding to other schemes up to a value of £500,000.

## 234. Procurement of Civil Parking Enforcement Services

The Committee received a report on the procurement of civil parking enforcement services for a five-year contract from 1 August 2025.

Ms Liz Walter was invited to address the committee on behalf of Mill Road 4 People. Suggesting that the Council should define what it considered to be high quality civil parking enforcement services, Ms Walter drew attention to multiple recent infractions on Mill Road, along with widespread instances of parking on double yellow lines, pavements, cycle lanes and junctions, and argued that the current services were not high quality, noting that the report did not address the strengths or weaknesses of the current arrangements. Highlighting repeated calls from local organisations and residents for wider and better enforcement, she queried how the Council would ensure the new provider was able to recruit more officers, particularly given the substantial income provided by enforcement activities, in order to reduce the level of illegal parking. It was emphasised that enforcement could only be carried out in line with legislation, which made it difficult to address issues such as parking on pavements and cycle lanes, although Members were assured that efforts to curtail such behaviour were ongoing. It was also noted that recruitment of Civil Enforcement Officers (CEOs) was made more challenging due to the hostile interactions and inclement weather that were experienced

while carrying out the role. It was clarified that any surplus income from parking enforcement, after funding associated costs, was reinvested in the Highways service.

Ms Linda Jones was invited to address the committee on behalf of Cambridge Living Streets. Emphasising the organisation's support for effective parking enforcement, Ms Jones argued that current arrangements were often ineffective, highlighting infractions such as parking on pedestrian crossings. Expressing concern that the report did not address the need to create safe space for walking and cycling to improve people's health, she suggested that such considerations should be emphasised in the procurement documentation and when training CEOs. It was reiterated that the Council was unable to carry out enforcement on a lot of parking infractions, such as parking in a cycle lane and other controlled zones, including around crossing points, due to current legislation. It was also clarified that CEOs were only employed if they had completed training and were fully qualified, although continuous information was provided to them on the extent of their powers, to ensure they could carry out enforcement and the ambassadorial aspect of their role appropriately.

While discussing the report, individual Members:

- Paid tribute to CEOs for their work in carrying out enforcement, particularly around schools and providing additional patrols when requested by local Members, acknowledging that they often found themselves in unpleasant and sometimes confrontational situations. Members were informed that CEOs wore body cameras and following any incidents, they submitted information and the footage to the Council and were then accompanied by the team leader to speak with the police if appropriate. It was agreed to provide Members with clarification on how many CEOs were operating at any given time. **Action required**
- Queried whether the new contract would require the provider to abide by the Council's expectations for a high quality service. Members were informed that the service level agreement with the current provider included a range of key performance indicators, such as the amount of shift time spent on the street and the number of errors made by CEOs, which would continue to be monitored with a new contract.
- Suggested that the new provider could consider using technological ways to support enforcement, such as the development of a tool for residents to report infractions so that CEOs can respond swiftly and with a targeted approach.
- Queried whether the Council would pay the full cost of the contract, or whether district councils in the areas that benefitted from the services would also contribute financially. It was clarified that as enforcement resulted in more income for the Council than expenditure, it did not represent a net cost to the Council. It was also confirmed that legislation required such income to be ringfenced for Highways spending.
- Noted that civil parking enforcement was currently only carried out in Cambridge and South Cambridgeshire, while other districts had demonstrated support for it to be expanded across the county, although one Member suggested that enforcement was only necessary or appropriate for larger towns and cities.

- Observed that people travelled to Cambridge for many purposes, including shopping, education, employment and healthcare, and argued that their needs should be taken into account as well as those of residents, although it was suggested that enforcement also supported the efficient flow of traffic, thereby benefitting all road users.
- Requested further information on enforcement of blue badges. It was confirmed that frequent such enforcement was carried out and that if a badge was confiscated it was dealt with by the blue badge team.
- Expressed concern about the number of repeat offenders, particularly by parcel delivery drivers, and suggested that enforcement should be carried out on repeat offenders in particular, although it was acknowledged that education of the public was also important.
- Highlighted the importance of carrying out enforcement after the implementation of a Traffic Regulation Order or Local Highway Improvement scheme, to educate people and ensure they were immediately aware that enforcement would be carried out on any new restrictions.
- Acknowledged the financial stress that the issuance of penalty charge notices may cause to those of a poor socio-economic background but argued that this was not an excuse for bad parking. Members also expressed concern that the cost of a penalty charge notice was not high enough, particularly given that offenders could pay only half the fine if done swiftly, and drew attention to the fact that the figure was cheaper than most of the parking options available in the centre of Cambridge, which detracted from the possibility of a fine acting as a deterrence.
- Observed the limitations that current legislation placed on enforcement and suggested that the Chair could write to the government to propose changes, particularly on issues including pavement parking restrictions, parking in cycle lanes, the level of fines, and dealing with repeat offenders. It was also noted that Parking and Traffic Regulations Outside London (PATROL) was working on the expansion across the wider country of powers currently restricted to London.
- Confirmed that if the proposed procurement did not take place, the Council would not be able to carry out civil parking enforcement after 30 September 2025.

It was resolved to:

- a) Authorise the Executive Director of Place and Sustainability, in consultation with the Chair and Vice Chair of the Highways and Transport Committee, to commence the procurement for Civil Parking Enforcement Services for a term of five years, with an option to extend for a further five years: and
- b) Delegate authority to the Executive Director of Place and Sustainability, in consultation with the Chair and Vice Chair of the Highways and Transport Committee, to award and execute a contract for the provision of Civil Parking Enforcement Services starting 1 August 2025 and extension periods.

## 235. Local Highway Improvement 2024-25 Programme

The Committee received a report on the outcome of the Local Highway Improvement (LHI) member panels and officer scoring of complex and non-complex LHI applications for the 2024/25 funding round, with the proposed projects listed in the prioritised lists attached at Appendix 1 of the report. It was also proposed that all unsuccessful complex LHI schemes be added to the Transport Planning Database for prioritisation through the Council's Delivering Transport Strategy Aims (DTSA) programme, with authority delegated to the Executive Director of Place and Sustainability, in consultation with Chair and Vice-Chair of the committee, to remove schemes that prove to be undeliverable and add new schemes in their place.

While discussing the report, individual Members:

- Welcomed the applications that had been received, highlighting their importance for local communities and the effort put into their preparation and paid tribute to officers for their work on assessing bids and providing support to applicants in the development stages.
- Expressed concern there was not more funding available to enable support for a higher number of projects, many of which had repeatedly been applying repeatedly for a number of years, and suggested that adding unsuccessful schemes to the underfunded DTSA programme was unlikely to make a difference. Members were informed that, whereas in previous years the unsuccessful schemes were not considered further, adding them to the DTSA programme would ensure they were considered during scoring opportunities if further active travel funds became available, for example through the CPCA.
- Argued that the costs for some of the proposals were higher than expected, and suggested that if such costs could be reduced, funding could become available for a wider number of projects. It was clarified that significant proportions of projects' budgets were sometimes allocated to cover risks, although it was emphasised that such risks did not always manifest and, in such situations, the remaining funds were reallocated appropriately. Notwithstanding, Members were informed that the Council was developing a more measured approach to allocating resources to risk by collating the risks of individual projects into a wider aggregate risk that would allow a higher proportion of resources to be allocated to delivery.
- Sought clarification on whether the lack of future maintenance costs for the Council was considered during the scoring process. **Action required**
- Noted that LHI schemes had to be supported by their local Member, and clarified that all Members would be advised, along with the applicants, of the outcome of the committee's decision on which projects were approved, and would be provided with the opportunity to further discuss both successful and successful applications with officers.

- Observed that there were a range of desired projects that were either too large to be an LHI scheme or too small to be treated as a major individual project, and suggested that consideration be given to how current arrangements could be modified to ensure such schemes could potentially be supported and funded.
- Drew attention to the high number of unsuccessful applications for additional street lighting that were received annually, and suggested that it was an issue that could be addressed separately from the LHI programme, noting that the current contract made it difficult to make progress.

It was resolved unanimously to:

- a) Approve the projects detailed in the prioritised lists attached at Appendix 1 to this report, to be designed and delivered;
- b) Agree that all unsuccessful complex LHI schemes should be added to the Transport Planning Database for prioritisation through the Council's Delivering Transport Strategy Aims programme, as set out in paragraph 3.6 of the report;
- c) Delegate authority to the Executive Director of Place and Sustainability, in consultation with Chair and Vice-Chair of the Highways and Transport Committee, to remove schemes that prove to be undeliverable and add new schemes in their place, as outlined in the report, to enable them to be designed and delivered; and
- d) Note that these schemes will be delivered through existing approved and compliant procurement arrangements.

## 236. Local 20mph 2024-2025 Programme

The Committee received a report on the outcome of the 20mph prioritisation process, with the proposed projects for the 2024/25 20mph design and delivery programme listed in the prioritised list attached at Appendix 1 of the report.

While discussing the report, individual Members:

- Welcomed the grass roots nature of the programme and suggested the extensive list of applications demonstrated broad enthusiasm for 20mph zones and other traffic calming measures. Notwithstanding, it was argued that consultations on proposed schemes could be wider, while the importance of local Members supporting applications in their division was highlighted.
- Suggested that the implementation of schemes across the county was likely to have already saved lives, although it was argued that 20mph limits were not just about protecting children outside schools or avoiding accidents, but about creating calmer, safer environments that would encourage more people to walk, cycle and be outside.

- Drew attention to the high number of applications for village wide schemes, including the five highest ranked schemes. However, it was suggested that the circumstances and design of each individual village and town affected whether a village wide scheme or a more targeted approach would be more appropriate and effective. It was argued that implementing fewer village wide schemes would allow a greater number of smaller schemes to be implemented, although it was emphasised that the size of the proposed schemes was at the discretion of applicants.
- Expressed concern about the estimated costs of schemes and queried why a large number of the projects had an identical cost of £18k, regardless of their area or size. It was clarified that the estimate costs were based on the previous average costs of implementing village wide schemes, and that more accurate figures could not be calculated until the schemes were designed and consulted on.
- Queried how the schemes would be monitored, noting that police forces had indicated they would not commit resources to enforcement. It was clarified that the police would be responsible for monitoring and enforcement, and that the Cambridgeshire and Peterborough Police and Crime Commissioner would be responsible for installing any additional speed cameras. Notwithstanding, Members suggested that 20mph zones statistically led to fewer casualties even without enforcement, and it was noted that a review of the effectiveness of all the 20mph schemes across the county would be carried out after two years.

It was resolved to:

- a) Approve the projects detailed in the prioritised lists attached to this report at Appendix 1;
- b) Delegate authority to the Executive Director of Place and Sustainability, in consultation with the Chair and Vice-Chair of the Highways and Transport Committee, to add and remove individual projects from the 20mph delivery programme as required; and
- c) Note that these schemes will be delivered through existing and compliant procurement arrangements.

## 237. St Ives and Fulbourn 20mph Zone and Speed Limit Schemes

The Committee received a report which proposed the installation of a 20mph zone in the southern half of St Ives and a 20mph speed limit and 40mph buffer zones in Fulbourn, with the objections and representations set out in the report and appendices.

Dr Chris Loughlan was invited to address the committee. Highlighting the significant number of applications for 20mph schemes across the county, Mr Loughlan drew attention to the involvement of parish councillors in the development of the Fulbourn application and the wide consultation of affected organisations and residents that had been carried out. Suggesting that the application represented a low cost, minimal intervention for maximum impact, he highlighted the number of vehicles that passed



through the village and argued that reducing their speed would increase safety, reduce noise, and improve the overall environment.

Mr David Cottee was invited to address the committee. Drawing attention to a survey carried out by Fulbourn Forum which resulted in 153 people supporting the proposals and only 8 people opposing them, Mr Cottee suggested the high speed limits of the roads approaching Fulbourn encouraged through traffic to travel faster. Highlighting the regular occurrence of accidents and near misses in the village, with tight corners exacerbating wider problems, he argued that a uniform 20mph limit throughout the village would provide uniformity and clarity while requiring less signage. Mr Cottee also noted that a further 300 houses were under construction in the village and suggested that the proposed scheme would incentivise more residents to walk and cycle.

Mr John Cooter-Baker was invited to address the committee. Drawing attention to the unpredictable and sometimes dangerous driving in Fulbourn caused by parked cars effectively reducing approach roads to one lane, Mr Cooter-Baker informed Members that residents were often anxious about crossing roads, particularly if using buggies or mobility scooters. He suggested that a 20mph limit would encourage smoother driving in general, while also reducing air pollution. Acknowledging that widespread monitoring and enforcement of the scheme would be difficult, Mr Cooter-Baker also argued that drivers would observe the limit due to the behaviour of other vehicles, as was the case in 30mph zones and other 20mph zones.

Dr Caroline Zwierzchowska-Dod was invited to address the committee. Emphasising that not all roads in the village were included in the proposed scheme's area, Dr Zwierzchowska-Dod highlighted the reasons behind the implementation of the Fulbourn scheme, as set out in the report, alongside evidence published by Living Street that suggested the scheme would bring tangible benefits to the local community. She argued that concerns about non-compliance were over-exaggerated and that evidence suggested average speeds reduced in areas where 20mph limits had been implemented, regardless of the level of enforcement. Arguing that the proposals enjoyed wide public support within Fulbourn, Dr Zwierzchowska-Dod challenged the suggestion that lower speeds resulted in higher pollution and suggested instead that they resulted in less damage to road surfaces.

Mr Jose Quiroz was invited to address the committee. Highlighting the high proportion of non-resident vehicles that passed through Fulbourn at high speed on their way to or from Cambridge, Mr Quiroz argued that reducing the speed limit would reduce the number and the seriousness of collisions that occurred in the village. He also suggested that drivers would travel at a lower speed, whether they fully complied with the restriction or not, and regardless of the level of enforcement.

Mr James Moore was invited to address the committee. Noting how the volume of traffic in Fulbourn had increased over recent decades, Mr Moore drew attention to regular collisions that occurred and welcomed the proposal to introduce a 20mph speed limit and a buffer zone on the edge of the village. However, he expressed concern that there were no plans for active enforcement of the proposals and suggested that consideration should be given on how to ensure compliance.

Councillor John Williams, the South Cambridge District Councillor for Fen Ditton and Fulbourn, was invited to address the committee. Welcoming the proposal to implement a 20mph scheme across the village of Fulbourn, Councillor Williams highlighted the popularity of cycling in the community and argued that a reduced speed limit would make active travel safer, as well as improving the lives of the wider community. He suggested that 20mph schemes worked even without enforcement because compliant vehicles slowed down other vehicles behind them and were therefore effectively self-enforcing.

While discussing the report, individual Members:

- Welcomed the proposed schemes in Fulbourn and St Ives and highlighted the importance of reports detailing and addressing objections to such proposals.
- Highlighted the significant issues experienced in Fulbourn due to approach roads having high speed limits, and argued that the complex layout of Fulbourn meant that the implementation of a 20mph limit that was not village wide was unlikely to be effective or successful, although it was suggested that some of the buffer zone's boundaries could be closer to the village than proposed.
- Observed that the proposed zone included only some of the cul-de-sacs in Fulbourn and sought clarification on why it was considered necessary to include them in the first place, and why some had not been included. Members were informed that some of the roads in Fulbourn were unadopted and therefore could not be included in the scheme without the relevant owner's consent. It was also noted that additional termination signs would increase the project's cost for little benefit, which is why some cul-de-sacs had been included despite the roads not presenting any particular speeding issues themselves.
- Noted that the local Member for St Ives South and Needingworth, Councillor Kevin Reynolds, did not support a blanket 20mph limit in St Ives and was concerned that such a measure could lessen the impact in places where there was more evident need for speed restrictions, with insufficient resources for monitoring or enforcing a scheme also meaning there would likely be a high level of non-compliance. It was clarified that the proposed scheme was for the southern part of St Ives, rather than the whole town.
- Welcomed the refinements to the originally proposed scheme in St Ives, noting that significant opposition to a town wide scheme had resulted in a more targeted scheme in St Ives South being adopted instead, which enjoyed the support of St Ives Town Council. It was also observed that there were a number of areas within St Ives that had already had traffic calming measures in place. Notwithstanding, some Members expressed concern that the scheme did not appear to have the same level of support as the scheme in Fulbourn.
- Sought clarification on why the two stretches of Green Leys that were perpendicular to Paragon Road were not included in the scheme. **Action required**

It was resolved to:

- a) Determine the formal objections to the St Ives South and Needingworth Speed Limit Order without holding a public inquiry, and for the reasons set out in the report and Appendix 4 (Statement of Reasons), approve the proposed speed limits as advertised;
- b) Inform the objectors to the St Ives South and Needingworth Speed Limit Order accordingly;
- c) Determine the formal objections to the Fulbourn Speed Limit Order without holding a public inquiry, and for the reasons set out in the report and Appendix 8 (Statement of Reasons), approve the proposed speed limits as advertised; and
- d) Inform the objectors to the Fulbourn Speed Limit Order accordingly.

## 238. Finance Monitoring Report – August 2024

The Committee received the Finance Monitoring Report to the end of August 2024 for the services within its remit, which reported a forecast revenue overspend of £3.9m, and a £3.9m slippage compared to the budgeted capital programme variation.

While discussing the report, individual Members:

- Noted that slippage related to the A14 de-trunking was due to the initial over-allocation of risk provision, rather than non-delivery, and that Members would shortly be provided with an update on the ongoing works.
- Requested further information on delays related to street lighting and queried whether any potential savings could be reallocated to support additional street lighting installation. Members were informed that the delays were a result of the complex nature of the Private Finance Initiative contract, although they were assured that efforts were ongoing to resolve the issues. It was clarified that the forecast savings were linked to a reduction in energy costs, and as they were related to revenue, they could not be reallocated to capital projects, such as the installation of additional lighting.
- Requested further information on the forecast underspend in safety inspection support and vehicles for Highways Asset Management. **Action required**
- Requested further information on the three items on the savings tracker in the Finance Monitoring Report that had a black RAG rating. Members were informed that the item relating to management efficiencies was the result of a recently implemented senior management restructure, and that savings would be achieved on a recurrent basis from the following financial year. The two items relating to Highways recycling were the result of further investigation concluding that a planned materials recycling facility at one of the Council's Highways depots was not deliverable or would not deliver the level of revenue that was outlined in its original business case.

It was resolved unanimously to:

Review and comment on the report.

239. Highways and Transport Committee Agenda Plan and Appointments to Outside Bodies

While discussing the committee's agenda plan, Members:

- Sought clarification on whether another report would be presented to the committee on A1421 traffic management and road safety options. **Action required**
- Requested an update on action taken following the Council's approval of a motion in July 2024 related to flooding issues in Little Paxton. **Action required**

Chair  
3 December 2024

## Petition - Reconsider the Ely's 20mph Zone

We, the undersigned, support 20mph speed limits in places such as outside Schools and in high pedestrian areas, where the evidence shows it is needed and will improve road safety.

We do not support the use of blanket 20mph zones like that imposed in Ely in March 2024, where the consultation was poorly executed, and where thousands of people that stood to be affected were unaware of the proposal and wide community support was not demonstrated.

We believe that the decision to implement the Ely 20mph zone being taken by a single Officer of Cambridgeshire County Council in a "delegated decision meeting" in consultation with the two County Councillors for Ely was wrong. We believe that such a decision should be taken by elected politicians in an open and transparent manner in a meeting that is open to the public to attend.

We call on Cambridgeshire County Council to reconsider the locations for 20mph speed limits in Ely, taking into account new Government guidance, and to properly evidence its proposals. This should also take into consideration whether and what type of on road engineering solutions are required in locations proposed for 20mph speed limits in order to secure maximum possible compliance.

Following this, we call on Cambridgeshire County Council to carry out a new comprehensive and well publicised consultation on the proposals in accordance with Government guidance.