

Civil Parking Enforcement

To: Highway & Transport Committee

Meeting Date: 7th September 2021

From: Steve Cox - Executive Director, Place and Economy

Electoral division(s): Fenland, Huntingdonshire and South Cambridgeshire

Key decision: Yes

Forward Plan ref: 2021/048

Outcome: To consider the application of Civil Parking Enforcement (CPE) in the Fenland, Huntingdonshire, and South Cambridgeshire districts.

Recommendation: The Committee is asked to:

- a) Authorise Cambridgeshire County Council (CCC) to prepare a Civil Enforcement Area (CEA) or Special Enforcement Area (SEA) application to the Department for Transport for a Designation Order for the introduction of CPE in Fenland, Huntingdonshire, and South Cambridgeshire.
- b) Delegate the approval of Agency Agreements with Fenland, Huntingdonshire and South Cambridgeshire District Councils, a funding agreement with the Greater Cambridge Partnership and the Department for Transport application to the Service Director (Place and Economy), in consultation with the Chair of the Highways and Transport Committee.

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1. Background

- 1.1 Civil Parking Enforcement (CPE) transfers the powers and responsibilities for on-street enforcement from the Police to the Highway Authority in accordance with the Traffic Management Act 2004.
- 1.2 CPE enables local authorities to effectively manage and enforce on and off-street parking areas to prevent inconsiderate parking, improve access, support local economies and business and contributes to the Council's overarching environmental objective to reduce congestion and improve air quality.
- 1.3 This requires the creation of Civil Enforcement Area (CEA) or Special Enforcement Area (SEA) across the whole of the individual district's administration area (A CEA covers civil parking enforcement of waiting and loading restrictions whilst a SEA includes additional powers to also enforce dropped kerb obstruction and double-parking offences).
- 1.4 To take up these powers, Cambridgeshire County Council (CCC) as the Highway Authority is required to make an application to the Secretary of State via Department for Transport (DfT) for a Designation Order which decriminalises parking enforcement across the whole of the application area. Applications are usually considered by the Secretary of State twice yearly, in April and October.
- 1.5 If the application is successful, CCC will be responsible for both the enforcement and administration of any on-street restriction within the approved CEA and/or SEA. All, or part, of these responsibilities can be delegated to the Districts via an Agency Agreement.
- 1.6 Of the 326 Local Authorities in England, 316 have adopted civil enforcement powers. Of 10 remaining, 4 fall within Cambridgeshire: Fenland, Huntingdonshire, South Cambridgeshire, and East Cambridgeshire. Of the remaining 6, 3 are scheduled to be implemented in Oxfordshire by the end of 2021.
- 1.7 CPE was introduced in Cambridge in 2004. Both administration and enforcement of this area is managed by CCC Parking Services Team.
- 1.8 Fenland District Council (FDC) and Huntingdonshire District Council (HDC) have approached CCC regarding the implementation of CPE across their respective administrative areas and developing parking enforcement policies that support all the Councils' transport policy and strategy objectives. Both Districts have sought and received approval to progress and implement on-street CPE through their own democratic processes.
- 1.9 South Cambridgeshire District Council (SCDC) has considered the issue of CPE and through conversations with the Greater Cambridge Partnership (GCP) they have agreed the GCP would fund the delivery of CPE in South Cambridgeshire. The Greater Cambridge Partnership (GCP) have identified

CPE in the South Cambridgeshire area as one of the measures to manage travel demand in the Greater Cambridge Area. A joint project led by CCC will assess and potentially implement CPE across this administrative area. SCDC have indicated they could support the introduction of CPE across their administrative area once the ongoing cost of a scheme was quantified and budgeted.

- 1.10 This report sets out the legal obligations and framework, a project timeline, resource requirements and future financial implications and risks.
- 1.11 East Cambridgeshire District Council (ECDC) are not currently considering the introduction of CPE. DfT have indicated an application for CPE omitting ECDC would be considered.
- 1.12 For further details on powers and responsibilities which will be transferred from the Police to the Highway Authority in accordance with the Traffic Management Act 2004 visit: [Guidance Manual for the Cambridge Parking Scheme - Enforcement](#).

2. Main Issues

CPE Feasibility Studies

- 2.1 CPE feasibility works have been commissioned by both FDC & HDC, to investigate the feasibility of introducing CPE in Fenland and Huntingdonshire respectively. This will enable FDC and HDC to move away from relying on the Police for enforcement to having the ability to focus enforcement on specific areas such as accessibility, traffic capacity, parking turnover as well supporting other policies in both towns and elsewhere across each district.
- 2.2 FDC and HDC have commissioned RTA Associates Ltd, a company who are experienced in decriminalising parking enforcement, to undertake extensive feasibility studies to cover all aspects of Civil Enforcement including:
 - Legal context
 - Benefit and disbenefits
 - Options for operating CPE
 - Financial implications
 - The CEA/SEA application process
- 2.3 These reports conclude that whilst CPE could be rolled out in both Districts which would address on-street parking non-compliance, it would not be financially viable to do so without on-going funding support. Due to impact that persistent and acute inconsiderate parking has on road safety and accessibility, FDC and HDC have taken steps to secure funding to cover the annual shortfall as well as all associated implementation costs. Ideally, CPE should be cost-neutral to an authority, however this is no longer an application requirement.

- 2.4 The GCP has offered to fund the feasibility work for the South Cambridgeshire area which would be led by CCC in consultation with the GCP and SCDC. Early indications suggest that CPE in the South Cambridgeshire area will not initially be financially viable without on-going revenue support. In principle the GCP has indicated that it would consider providing capital funding to cover all survey and associated implementation costs and on-going financial support to cover any revenue shortfalls for a time limited period (to be negotiated) with the assumption that CCC would consider the introduction of on-street parking charges in south Cambridgeshire, where necessary and financially viable, to help reduce any revenue shortfall.
- 2.5 Further survey work will be commissioned across Fenland, Huntingdonshire and South Cambridgeshire to assess the condition of signs and lines indicating the various parking restrictions. This is a requirement for CPE as without compliant signs and lines enforcement is not possible. FDC and HDC will initiate these surveys once the committee has considered the recommendation made in this report. FDC and HDC will fund this survey work. For South Cambridgeshire CCC will need to initiate this review, in consultation with SCDC and the GCP.
- 2.6 A cross-authority officer working group with representatives from CCC, FDC, GCP and HDC will assess the findings of these studies to establish:
- The level of remedial work (physical work) required to ensure signs/lines are brought up to an enforceable standard.
 - The level of work required to ensure all restrictions are underpinned by TROs.
 - A works programme for remedial works.
 - Agency/funding agreements covering On and Off-street enforcement, administration responsibilities and implementation costs.

On and Off-Street enforcement and administration options

- 2.7 To enable CCC to delegate enforcement and administrative responsibilities, FDC and HDC would need to act as agents to CCC. This would be achieved through independent Agency Agreements which would set out the practicalities of the delegation authority of the respective districts. Should any or all services be outsourced by the districts, FDC and HDC would assume full responsibility for all contractual issues.
- 2.8 Initial feasibility work has outlined 3 models for the delivery of enforcement and administration services necessary for the implementation of CPE. These are:
- a) **In-house** - The provision of an in-house services delivery model which would require a Parking Services Processing Team, Enforcement Team and supporting IT.

- b) **Externalisation** – Externalising all services to an established contractor such as CCC who already has end-to-end process and infrastructure in place.
- c) **Hybrid** – using a mix of in-house and externalised services.

2.9 Initial indications have shown that FDC is favouring externalising the service initially and HDC, as they already have their own parking enforcement service, are looking to expand their current operation to facilitate these new services and responsibilities in-house. It is considered that the most cost-effective model for the South Cambridgeshire area would be to extend the role of the existing in-house CCC parking enforcement service given the proximity of the area to Cambridge and the lack of any existing parking enforcement service within SCDC.

2.10 A county wide collaborative parking policy will be required to support parking enforcement across the county, standardising processes where possible but acknowledging there may be the need to tailor processes to address individual districts requirements.

Opportunities and Risk

2.11 This joint project supports the later stages of the Covid-19 'recovery' efforts, both in helping to ensure walking, cycling and bus corridors are free from obstructions, but also to manage a potential increase in car travel and the associated issues that can arise.

2.12 The flexibility CPE brings will enable the targeted enforcement of problematic parking. It will support the economic growth of market towns and help with the creation of successful, well-functioning new communities. It will help manage some of the conflict around parking, use of cycle paths and footways and help to embed good parking behaviours.

2.13 The introduction of CPE also promotes active travel and supports environmental objectives to reduce congestion and improve air quality through proactively managing parking restrictions which will help ensure the highway is safer and clear of obstructions.

2.14 There are several risks associated to this project. These include:

- **Approval** - There is the risk that the application for CPE maybe refused by the Secretary of State. This could be on either technical or process grounds and may result in the requirement to resubmit the application. Using experienced consultants to advise on the process will minimise risk.
- **Responsibility** - Once the DfT have approved the Designation Order, there is no way to reverse the process. CCC would have to ensure that systems are in place and any resource and financial deficits are covered.

Establishing mutually acceptable Agency Agreements is an integral element of this process and one that mitigates a certain level of risk. This also carries risks as districts could revoke the agreement.

- **Financial** - The districts predicted operational revenue shortfalls may have been underestimated. The forecasted number of Penalty Charge Notices (PCNs) issued may be less than predicted whilst travelling time between areas more. The time taken to get to a cost-neutral position may be longer than expected.

As CCC are to be responsible for the on-going maintenance and upkeep of all the on-street signs and lines across all the districts, the introduction of CPE will result in increased maintenance costs.

- **Operational** - Districts may not be ready to take over responsibilities particularly in those districts that are opting for CPE in house delivery model.
- **Project Timelines** - Project timelines are dependent on several elements including application approval, analysis of signs and lines, remedial work and Traffic Regulation Orders and Agency Agreement being in place. Any delays including any changes to existing legislation or the introduction of new legislation, will inevitably result in project timeline slippage.

2.15 Certain responsibilities will remain with CCC these include:

- i. The making of Traffic Regulation Orders (TROs) either as a result of the introduction of new restriction or a change in legislation.
- ii. The overarching on-street Parking/Enforcement Policy.
- iii. Ensure compliance with any new national legislation.

Funding

2.16 FDC have anticipated that the successful outcome of a £400k grant from Cambridgeshire and Peterborough Combined Authority (CPCA) would cover all associated set-up costs including any survey and remedial works. It is not envisaged that CPE will be self-funding, FDC would therefore need to cover an estimated annual operational deficit of between £45k-£75k (depending on the delivery model). Whilst it is accepted that a high level of enforcement would be needed from the onset, less enforcement provision will be envisaged as the scheme embeds and driver behaviour changes.

It is anticipated that CCC will continue to be responsible for the on-going maintenance and upkeep of on-street signs and lines.

2.17 For HDC, capital funding investment would cover all associated set-up costs and revenue funding any survey work. Again, it is not envisaged that CPE will be self-funding. HDC would therefore need to cover an estimated annual

operational deficit of between £70k-£80k (depending on the delivery model). HDC are looking to use their off-street parking account to cover this shortfall.

Again, it is accepted that a high level of enforcement would be needed from the onset, with a gradual reduction in enforcement provision as the scheme embeds and driver behaviour changes.

It is anticipated that CCC will continue to be responsible for the on-going maintenance and upkeep of on-street signs and lines.

- 2.18 For South Cambridgeshire, the GCP has in principle, indicated that it would consider providing funding to cover all the associated scheme implementation costs, including surveys/studies and remedial works along with additional financial support to cover any operational revenue shortfall for a time limited period.

Estimated operational costs will form part of the commissioned feasibility study and any shortfall will need to be agreed with GCP in consultation with SCDC.

- 2.19 The above projected annual operational costs are estimated and, as such further financial modelling will be undertaken once all survey/studies have been completed inform the drafting of the Agency Agreements.

Legal

- 2.20 The Traffic Management Act permits Highway Authorities to apply to the Secretary of State to become CEAs or SEAs, usually referred to as a CEA. Once a CEA application is approved, the power to enforce on-street parking restrictions would pass from the Police to the Highway Authority or its agent.
- 2.21 The revenue collected from Penalty Charge Notices (PCNs) for contravention of parking restrictions goes to the Council (or its agent depending on the model implemented) rather than to the Government. It is unlikely that PCN income will generate a surplus, however surplus income from on and off-street parking penalty charges is ring-fenced as defined in Section 55 of the Road Traffic Regulation Act 1984 and may only be used for certain designated highways matters and environmental improvements.
- 2.22 Upon introducing CPE, the local authority must operate its off-street car parks for enforcement purposes, under the Traffic Management Act 2004. The local authority should ensure that all car parks requiring an off-street parking places order have new orders in place before the introduction of CPE.
- 2.23 The Traffic Management Act introduces a process defined by statute for the issue and processing of penalty charge notices which is different to the existing fixed penalty notice system FDC and HDC currently use to enforce its parking areas. The process of application for CEA/SEA is set out in law.

Delivery

- 2.24 Should the request to proceed with an application to the DfT to implement CPE be approved, a full consultation of key stakeholders will be undertaken. If a successful application is made, a formal communications strategy will then be developed to support the implementation of CPE.
- 2.25 An Indicative timetable for implementation is as follows:

Milestone	Date
Committee approval sought in-line with the recommendations of this report.	Sept 21
Draft Agency Agreements	Oct 21 – Jan 22
Approval of Agency Agreement	Feb 22 – Jun 22
Commence review of existing signs, lines, and TROs.	Mar 22 – May 22
Draft application developed for the introduction of CEA/SEA in districts.	Feb 21 – Sept 22
Raise purchase orders & commission remedial works.	Jun 22 – Aug 22
Commence remedial works	Sept 22 – Sept 23
Establish 'Back Office' (Enforcement/processing Team/IT).	Jul 22 – Sept 23
Application submitted to the DfT	Oct 22
Dft Review & parliamentary process.	Oct 22 – Mar 23
Commence the Statutory Consultation process.	Apr 23 – Jun 23
Designation Order created Order and CPE brought into effect.	Oct 23

Summary

- 2.26 It is proposed CCC officers in consultation with HDC, FDC and SCDC prepare a CEA/SEA application to the Department for Transport for the introduction of CPE in Fenland, Huntingdonshire, and South Cambridgeshire.
- 2.27 It is proposed that officers work with partners to draft agency agreements and a funding agreement with FDC and HDC and a funding agreement with the GCP which will, as far as reasonably practicable, mitigate CCC exposure to operational and financial risk.
- 2.28 It is proposed that the Service Director (Place and Economy) be delegated to approve the agreements with FDC, HDC and the GCP, in consultation with the Chair of the Highways and Transport Committee.

3. Alignment with corporate priorities

The introduction of CPE will enable the Councils to move away from relying on the Police for parking enforcement to having the ability to focus enforcement on specific areas. Areas where traffic flow, accessibility, and safety is compromised by persistent obstructive parking and where congestion and air pollution are high and parking turnover is essential to supporting local business.

3.1 Communities at the heart of everything we do

The following bullet points set out details of implications identified by officers:

- Releases community Policing resources.
- Address persistent, dangerous, obstructive parking to ensure traffic flow and parking turnover.
- Improved access for all who use the highway (including pavements)
- Support the local economies
- Reduce congestion and improve air pollution

3.2 A good quality of life for everyone

The following bullet points set out details of implications identified by officers:

- Address persistent, dangerous, obstructive parking as well as supporting other policies in both towns and elsewhere across each district.
- Improved access for all who use the highway (including pavements)
- Reduce congestion and improve air pollution

3.3 Helping our children learn, develop and live life to the full

There are no significant implications for this priority

3.4 Cambridgeshire: a well-connected, safe, clean, green environment

The following bullet points set out details of implications identified by officers:

- Address persistent, dangerous, obstructive parking to ensure the free flow of traffic
- Improved access for all who use the highway (inc. footways)
- Reduce congestion and improve air pollution

3.5 Protecting and caring for those who need us

Addresses obstructive parking, improves accessibility and safety for all that use the highway (including pavements).

4. Significant Implications

4.1 Resource Implications

The following bullet points set out details of significant implications identified by officers:

- Once CEA/SEA have been approved by the DfT, there is no way to

reverse the process. CCC would need to ensure that systems are in place to provide enforcement and administration services and resource and financial deficits covered.

- Establishing Agency Agreements with the districts will mitigate a certain level of risk. FDC and HDC have indicated they would cover all associated set-up costs and any operational deficit. For South Cambridgeshire, the GCP has indicated that it will cover the associated set-up costs and any operational deficit for a time limited period. Enforcement and administration responsibility could also be delegated to the districts, where appropriate.
- There is the risk that the districts may have underestimated operational shortfalls and that any agency agreement could be revoked.
- Resources would need to be made available by CCC to cover the project management, Policy review, TROs alignment and consultation, drafting and submitting the CPE application and facilitating enforcement and administrative services if required.
- The CCC maintenance budget would need to be reviewed and additional funding sought to cover the on-going maintenance and upkeep of any additional on-street signs and lines.

4.2 Procurement/Contractual/Council Contract Procedure Rules Implications

There are no significant implications within this category.

4.3 Statutory, Legal and Risk Implications

Once an CEA/SEA has been approved by the DfT, there is no way to reverse the process. CCC would have to ensure that systems are in place to provide enforcement and administration services and resource and financial deficits covered.

Establishing Agency Agreements with the districts will mitigate a certain level of risk. FDC and HDC have indicated that they will cover all the associated set-up costs along with any operational deficit. For South Cambridgeshire, the GCP has indicated that it will cover the associated set-up costs and any operation deficit for a time limited period.

There is the risk that the districts may have underestimated operational shortfalls and that any agency agreement could be revoked.

4.4 Equality and Diversity Implications

There are no significant implications with this priority. An Equality Impact Assessment is attached in appendix 1.

4.5 Engagement and Communications Implications

In the event we proceed with the implementation of CPE and in-line with DfT recommendations, we will consult the Police neighbouring local authorities

and other interested parties which would include but not limited to Highways England, Emergency Services and the Driver and Vehicle Licensing Agency (DVLA). Consultation will form part of the implementation phase.

4.6 Localism and Local Member Involvement

There are no significant implications within this category

4.7 Public Health Implications

There are no significant implications within this category

4.8 Environment and Climate Change Implications on Priority Areas

4.8.1 Implication 1: Energy efficient, low carbon buildings.

Positive/neutral/negative Status: **Neutral**

Explanation:

4.8.2 Implication 2: Low carbon transport.

Positive/neutral/negative Status: **Neutral**

Explanation:

4.8.3 Implication 3: Green spaces, peatland, afforestation, habitats and land management.

Positive/neutral/negative Status: **Neutral**

Explanation:

4.8.4 Implication 4: Waste Management and Tackling Plastic Pollution.

Positive/neutral/negative Status: **Neutral**

Explanation:

4.8.5 Implication 5: Water use, availability and management:

Positive/neutral/negative Status: **Neutral**

Explanation:

4.8.6 Implication 6: Air Pollution.

Positive/neutral/negative Status: **Positive**

Explanation: CPE enables local authorities to effectively manage and enforce on and off-street parking areas to prevent inconsiderate and obstructive parking which help to keep traffic moving and reduces vehicle emissions.

4.8.7 Implication 7: Resilience of our services and infrastructure and supporting vulnerable people to cope with climate change.

Positive/neutral/negative Status: **Neutral**

Explanation:

Have the resource implications been cleared by Finance?

Yes

Name of Financial Officer: Sarah Heywood

Have the procurement/contractual/ Council Contract Procedure Rules implications been cleared by the Head of Procurement?

Yes

Name of Officer: Henry Swan

Has the impact on statutory, legal and risk implications been cleared by the Council's Monitoring Officer or LGSS Law?

Yes

Name of Legal Officer: Fiona McMillan

Have the equality and diversity implications been cleared by your Service Contact?

Yes

Name of Officer: Elsa Evans

Have any engagement and communication implications been cleared by Communications?

Yes

Name of Officer: Sarah Silk

Have any localism and Local Member involvement issues been cleared by your Service Contact?

Yes

Name of Officer: David Allatt

Have any Public Health implications been cleared by Public Health?

Yes

Name of Officer: Iain Green

If a Key decision, have any Environment and Climate Change implications been cleared by the Climate Change Officer?

Yes

Name of Officer: Emily Bolton

5. Source documents guidance

5.1 Source documents

- TMA Enforcement Manual May 2015
- Fenland District Councils Cabinet report. Meeting date 22nd March 2021, item 7, Civil Parking Enforcements Update.
- Huntingdonshire District Council Overview and Scrutiny Panel report. Meeting date 4th February 2021, item 40, Civil Parking Enforcement.
- Greater Cambridge Partnership Executive Board. Meeting date 18th March 2021, item 2.1, (b)

5.2 Location

[Guidance Manual for the Cambridge Parking Scheme - Enforcement](#)

[Fenland District Council Cabinet Agenda - 22 March 2021](#)

[Huntingdonshire District Council's Overview and Scrutiny Panel - 4 February 2021](#)

[Greater Cambridge Partnership Executive Board - 18 March 2021](#)

Appendix 1

Equality Impact Assessment For employees and/or communities

Section 1: Proposal details

Directorate / Service Area:		Person undertaking the assessment:	
Place & Economy		Name:	Nicola Gardner
Proposal being assessed:		Job Title:	Parking Policy Manager
The introduction of Civil Parking Enforcement in Fenland, Huntingdonshire and South Cambridgeshire.		Contact details:	01223 727912
Business Plan Proposal Number: (if relevant)	N/A	Date commenced:	05/07/21
		Date completed:	04/08/21
Key service delivery objectives:			
To make a Civil Parking Enforcement (CPE) application to the Secretary of State via Department for Transport (DfT) which will create Civil Enforcement Area (CEA) or Special Enforcement Area (SEA) across Fenland, Huntingdonshire, and South Cambridgeshire.			
Key service outcomes:			
The effective management and enforcement of on and off-street parking areas across the above-mentioned administrative areas to address habitual inconsiderate parking, support local economies and contributes to the Councils overarching environmental objective to reduce congestion and improve air quality.			
What is the proposal?			
<p>Currently parking enforcement outside of Cambridge City is undertaken by the Police. With stretched resources, policing parking contraventions is understandably not a high priority. The introduction of CPE will move these powers and responsibilities from the Police to the Highway Authority, Cambridgeshire County Council (CCC), in accordance with the Traffic Management Act 2004.</p> <p>Through individual Agency Agreements, CCC will delegate some/all enforcements and administrative responsibilities which will enable the local authorities to focus enforcement where it is most appropriate.</p>			
What information did you use to assess who would be affected by this proposal?			
Feasibility studies undertaken by Fenland District Council (FDC) and Huntingdonshire District Council (HDC).			
Are there any gaps in the information you used to assess who would be affected by this proposal?			

No

Who will be affected by this proposal?

Local Authorities will have enforcement flexibility however they will need to consider additional staff to cover the increased workloads and secure funding to cover set-up and ongoing costs.

Reduced pressure on limited Police resources

With the free flow of traffic local communities should see reduced congestion and air pollution and improved access to local amenities. With the enforcement of time-limited bays, an uplift in footfall to local business.

For those who hold a valid blue badge, greater parking opportunities particularly close to local facilities.

Drivers should see improved journey time, better access to local amenities/ shops and Penalty Charge Notice (parking ticket) being issued to those who park in contravention.

Section 2: Identifying impacts on specific minority/disadvantaged groups

Scope of Equality Impact Assessment					
*	Age	<input type="checkbox"/>	*	Disability	<input type="checkbox"/>
*	Gender reassignment	<input type="checkbox"/>	*	Marriage and civil partnership	<input type="checkbox"/>
*	Pregnancy and maternity	<input type="checkbox"/>	*	Race	<input type="checkbox"/>
*	Religion or belief (including no belief)	<input type="checkbox"/>	*	Sex	<input type="checkbox"/>
*	Sexual orientation	<input type="checkbox"/>			
	Rural isolation	<input type="checkbox"/>		Poverty	<input type="checkbox"/>

Section 3: Explanation of 'no foreseeable risk' EIA screening

		Characteristic / group of people	Explanation of why this proposal will not have a foreseeable risk of negative impact
1	*	Age	The proposal is a change in the enforcement responsibility from the Police to the local authorities. This does not change the parking policy itself, nor access to parking provision
2	*	Disability	As per 'Age' above. And for those who hold a valid blue badge, greater parking opportunities particularly close to local facilities.
3	*	Gender reassignment	As per 'Age' above.
4	*	Marriage and civil partnership	As per 'Age' above.
5	*	Pregnancy and maternity	As per 'Age' above.
6	*	Race	As per 'Age' above.
7	*	Religion or belief (including no belief)	As per 'Age' above.
8	*	Sex	As per 'Age' above.
9	*	Sexual orientation	As per 'Age' above.
10		Rural isolation	As per 'Age' above.
11		Poverty	As per 'Age' above.

Section 4: Approval

I confirm that I have assessed that a full Equality Impact Assessment is not required.

Name of person who completed this EIA:	Nicola Gardner
Signature:	Signature removed for publication
Job title:	Parking Policy Manager
Date:	04/08/21

I have reviewed this Equality Impact Assessment – Screening Form, and I agree that a full Equality Impact Assessment is not required.

Name:	Elsa Evans
Signature:	Signature removed for publication
Job title:	Funding and Innovation Programme Manager (authorised officer for signing off equality impact assessment)
Date:	06/08/21