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Foreword

Welcome to Watford Borough Council's annual parking enforcement report for 2016/17.

As you will see, we are doing lots of good work in Watford to make sure parking is safe, easy and fair for our residents, businesses and visitors.

Our controlled parking zones help to improve the quality of life for local residents in areas where there is little or no on-street parking, giving people a greater chance of finding a parking space close to their home. We continue to be responsive to requests for changes and additions to parking controls across the town. Over the last year we have carried out various consultations with groups of residents about parking in their area. In deciding whether or not to introduce on-street parking controls we are guided by the views of residents most closely affected.

We have carried out improvements to the operation of controlled parking. Our residents can now order and renew their parking permits online; and we hope to digitise more of our parking services as the year continues.

As you will read, the aim of the Parking Service is to be self-financing, and we continue to be successful in achieving this. That means we don't need to use council tax money to fund the service.

We are always keen to hear what you think; join the conversation on Twitter @WatfordCouncil, email us: watfordcouncil@watford.parkinguk.org or you can write to me directly here at the Town Hall, Watford, WD17 3EX.

Cllr lain Sharpe, **Cabinet Member for Regeneration & Development**

Introduction

This report seeks to explain what we are doing to meet our parking policy objectives, detailing the key operational and financial information of the service.

There are huge and ever increasing demands on the limited road space within Watford, which are more comparable with London Local Authorities, as opposed to a town compacted into an area of just 21-square kilometres.

Watford is home to more than 34,000 households and 90,000 inhabitants, an expanding regional shopping centre attracting in excess of 400,000 visitors each week, a Premier League football club with a home capacity of 21,000 seats and an award winning park, Cassiobury, which receives over 1.2m visits a year. Additionally, the town centre has a vibrant night time economy including a restaurant met quarter, Palace Theatre and Colosseum entertainment venue all bringing in a regular influx of visitors.

Businesses are equally important to the sustainability, economy and appeal of Watford and their ability to receive goods and deliveries is often essential to their operations. Similarly, residents expect to be able to park within a reasonable distance to their homes, particularly with off-street parking being at a premium in many areas throughout the town.

Inevitably, competition amongst the various groups of road users is high and their reasons for parking will often be conflicting.

The council Parking Service bears responsibility for balancing the demands and desires of the various groups against the management of the limited degree of road space available as best as possible, in order to maximise parking opportunities and improve compliance to existing parking regulations.

In accordance with the Traffic Management Act 2004, local authorities that carry out Civil Parking Enforcement (CPE) are expected to be accountable and transparent and as such are required to publish an annual report every financial year.

Further information regarding the Traffic Management Act 2004 and the Department for Transport Operational Guidance to local authorities can be viewed on the website gov.uk/government or via the following link:

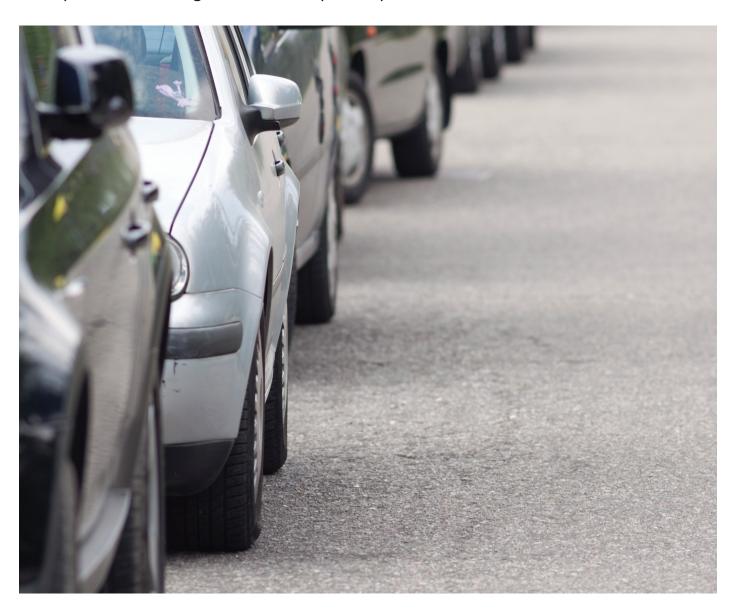
gov.uk/government/publications/operational-guidance-to-local-authorities-parking-policy-andenforcement

Background

In respect of on-street parking enforcement, Watford Borough Council acts on behalf of Hertfordshire County Council (the highway authority) under the terms of a parking agency agreement between the two authorities. As the parking authority Watford Borough Council is responsible for the enforcement of its own off-street car parks.

Watford Borough Council works in partnership with Three Rivers District Council and Dacorum Borough Council with Watford Borough Council hosting a parking enforcement contract with an external parking enforcement contractor, Indigo Park. This contract provides parking enforcement officers, office functions, pay and display maintenance, permit issue etc.

Three Rivers and Dacorum will each produce their own annual reports. This report covers only the activity of Watford Borough Council for the period April 2016 - March 2017.



The purpose of Civil Parking **Enforcement (CPE)**

"CPE is a means of achieving transport policy objectives...but raising revenue should not be an objective of CPE, nor should authorities set targets for revenue or the number of Penalty Charge Notices they issue"

> (Department for Transport Traffic Management Act 2004) Operational Guidance to Local Authorities)

The primary purpose of CPE, as identified in the statutory guidance, is to support local authorities (county and district) in their delivery of their overall transport objectives in areas such as those detailed below.

- Managing the traffic network to ensure free movement of traffic, (including pedestrians and cyclists), as required under the TMA Network Management Duty.
- Improving road safety.
- Improving the local environment.
- Improving the quality and accessibility of public transport.
- Meeting the needs of people with disabilities, some of whom will be unable to use public transport and depend entirely on the use of a car.
- Managing and reconciling the competing demands for kerb space.

It is not always easy to prove that CPE has a positive effect. Driving along a free-flowing road or walking along a footway without being blocked by parked cars is rarely noted or associated with CPE. Likewise, finding space in a clean, safe, well lit car park is taken for granted. It is often noted, however, when these essential benefits are not available.

CPE in Watford is undertaken by Indigo Park on behalf of the council under a contract that will expire in April 2018. The provision of this contract includes the following:

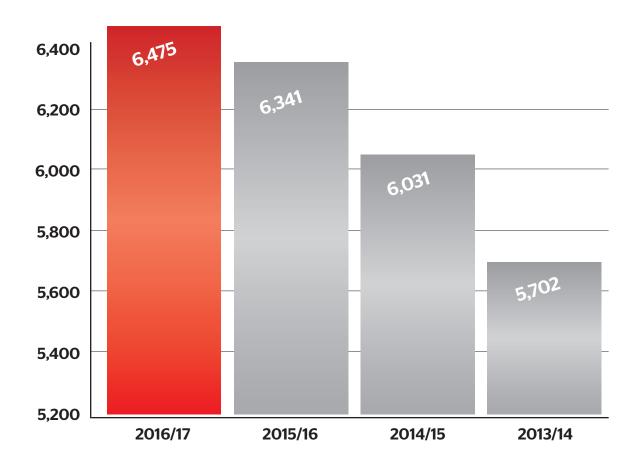
- 23 Civil Enforcement Officers (Watford only)
- Notice Processing staff
- Maintenance and cash collection of Pay and Display machines
- IT hardware/software and support services
- Enforcement vehicles
- Suspension services
- Stationery
- Cleaning

Controlled Parking Zones

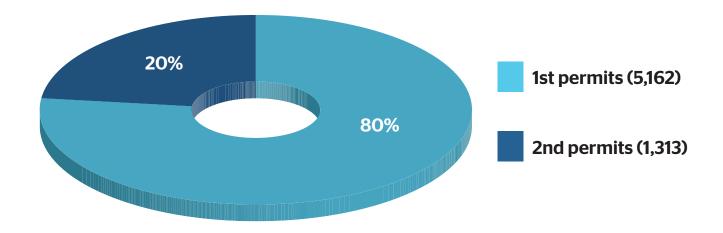
In order to fulfil our obligation to manage kerb side space effectively, Watford Borough Council has introduced a number of Controlled Parking Zones which effectively restrict all on-street space within its boundaries to particular users. There are 16 Controlled Parking Zones in Watford requiring varying hours of enforcement between 8am and 10pm, Monday to Sunday, including Bank Holidays.

Permits

During 2016/17 the following residents' parking permits were issued across the Controlled Parking Zone scheme:



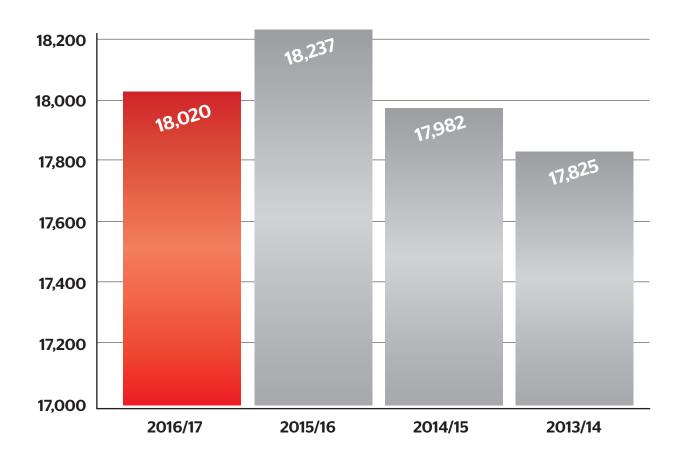
Of the 6,475 residents' permits issued during 2016/17, the following were issued as first and second permits:



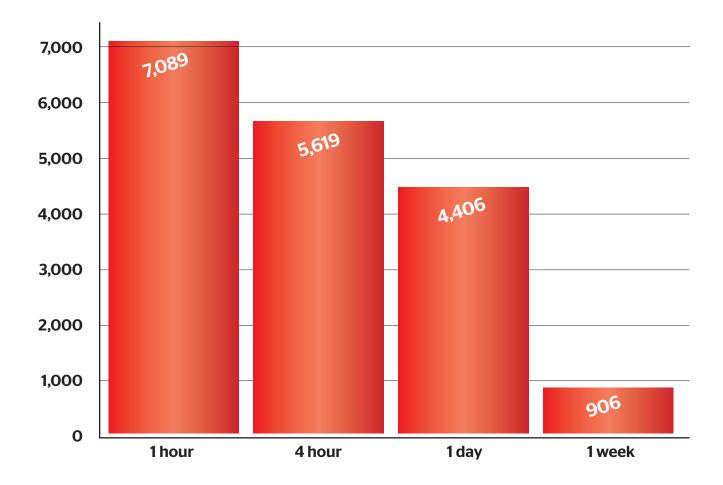
The cost of permits is £25 for the first permit in the household and £55 for the second permit, limited to one per person.

Visitor Vouchers

During 2016/17 the following residents' visitor vouchers were issued across the Controlled Parking Zone scheme:



Of the 18,020 residents' visitors vouchers issued during 2016/17, the following were issued as 1-hour, 4-hour, 1-day, 1-week vouchers:



Further information regarding the Controlled Parking Zone scheme, including a map of the zones throughout Watford, can be found on parking pages of the council website at watford.gov.uk or via the following link:

watford.gov.uk/ccm/navigation/transport-and-streets/parking/parking-permits

Pay and Display & Car Parks

Pay and Display

Pay and display machines are situated throughout the Controlled Parking Zones and close to shopping facilities and local amenities. Permitted durations of stay are generally limited to 1, 2 or 4 hours and on-street charges are commonly £1 per hour (20p for 12-minutes) or £1.50 per hour (30p for 12-minutes).

Those located in the Controlled Parking Zones are highlighted on the zone map, which can be viewed on the parking pages of the council website at watford.gov.uk or via the following link:

watford.gov.uk/ccm/content/parking/watford-controlled-parking-zones-map.en

- There are a total of 75 on-street pay and display machines
- 430,165 on-street transactions during 2016/17

Car Parks

There are 8 off-street pay and display machines situated within the council operated car parks. These are detailed below:

- The Avenue (x2)
- The Town Hall (x2)
- Town Hall Visitors (x1)
- Longspring (x1)
- Central Leisure Centre (x1) (No charges apply)
- Timberlake (x1)

A further machine is located within the Harebreaks on-street car park.

117,261 off-street transactions took place during 2016/17

Pay and display and off-street income is shown under "Financial Information" (see page 24)

Enforcement

"The Secretary of State considers that the exercise of discretion should, in the main, rest with back office staff as part of considering challenges against penalty charges and representations that are made to the local authority. This is to protect civil enforcement officers from allegations of inconsistency, favouritism or suspicion of bribery. It also gives greater consistency in the enforcement of traffic regulations."

(Secretary of State's Statutory Guidance to Local Authorities on the Civil Enforcement of Parking Contraventions)

The council and Indigo Park have entered into a partnership using the British Parking Association model contract, which encourages best practice by ensuring that performance is measured on the quality of the service delivered. All Civil Enforcement Officers are salaried staff and do not work on any form of commission or ticket quota basis. Civil Enforcement Officers are not afforded discretion to ignore a vehicle parked in contravention. The initial objective of a Civil Enforcement Officer is to encourage compliance to the parking regulations or to move a vehicle on and a penalty charge will only be issued where it is evident that no alternative form of action can be taken.

During 2016/17 the following level of enforcement was carried out:

- 30,516 enforcement hours
 Average of 2,534 hours per month
- 381,284 visited locations
 Average of 31,774 visits per month

This enforcement included coverage of over 500 roads, 16 Controlled Parking Zone's, 44 schools, 10 car parks and 21 match days, including bank holidays, Sundays and evenings.

"Enforcement authorities should aim to increase compliance with parking restrictions through clear, well designed, legal and enforced parking controls."

(Secretary of State's Statutory Guidance to Local Authorities on the Civil Enforcement of Parking Contraventions)

An intensive lining and signing program is maintained in Watford, in line with the requirements of the Traffic Signs Regulations and General Directions 2016, to ensure that restrictions are communicated to motorists as clearly and concisely as possible so that the receipt of Penalty Charge Notices can be avoided, further achieving the objectives of the CPE regime.

Penalty Charge Notices

"The purpose of penalty charges is to dissuade motorists from breaking compliance...the objective of CPE should be for 100 per cent compliance, with no penalty charges."

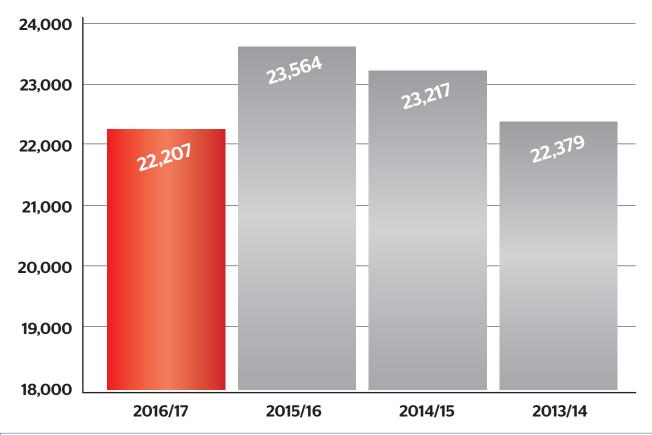
> (Department for Transport Traffic Management Act 2004) Operational Guidance to Local Authorities)

The Traffic Management Act 2004 became operational in April 2008 and introduced differential penalty charges. The intention being to create a perception of fairness through proportionally applying a lower (£50) or higher (£70) charge according to the perceived seriousness of the contravention i.e. parking on a double yellow line or within a disabled bay (without the required blue badge) attracts a higher penalty than overstaying paid for time in a pay and display bay.

Details of parking contraventions enforced in Watford during 2016/17 and their associated penalty charge are detailed in The Penalty Charge Notice Cancellation and Guidance Policy, which can be found on the parking pages of the council's website at watford.gov.uk or via the following link:

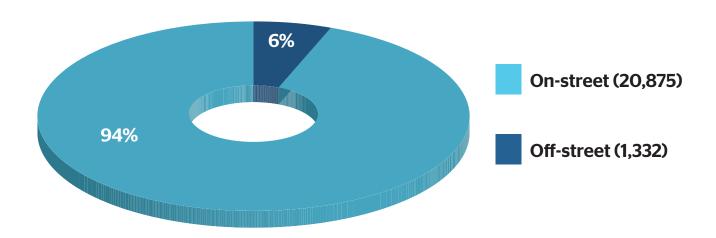
watford.gov.uk/ccm/content/parking/penalty-charge-notice-guidance-and-cancellation-policydocument.en

During 2016/17 the following Penalty Charge Notices were issued:

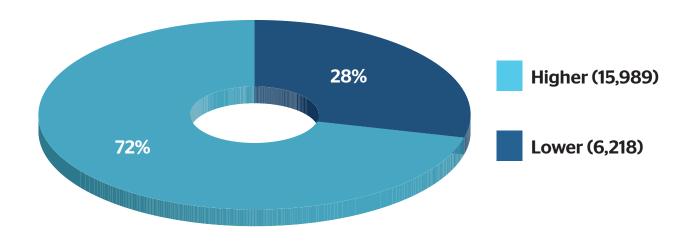


The volume of penalties issued each year has been fairly consistent at around 20,000 as motorists have recognised that parking enforcement is in place and the compliance level grows. Increases to this trend will commonly occur following the introduction of new schemes or extended hours of enforcement, such as Sunday enforcement around the Cassiobury Park area and daily evening enforcement of the met quarter in King Street, which has continued to take place in 2016/17, further to the introduction of new zones and zone extensions.

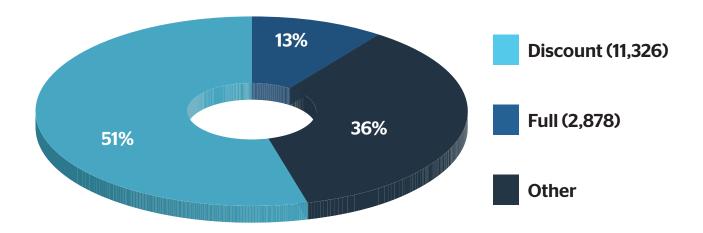
Of the 22,207 penalties issued during 2016/17, the following were issued on and off-street:



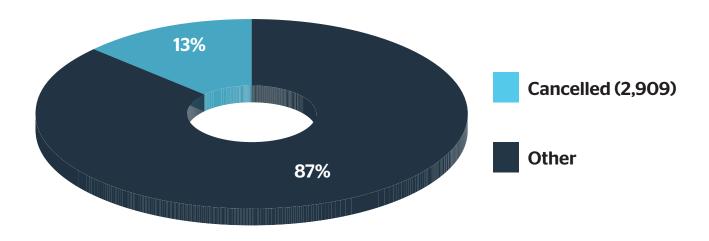
Of the 22,207 penalties issued during 2016/17, the following were issued as lower or higher charge contraventions:



Of the 22,207 penalties issued during 2016/17, the following were paid at the discounted or the full charge:



Of the 22,207 penalties issued during 2016/17, the following were cancelled:



Penalty charge levels are set by a specific Order outlined by regulation for inside and outside of London. Watford has adopted the Band 2 level.

PCN levels outside of London from 31 March 2008					
Band Higher level penalty		Lower level penalty			
1	£60	£40			
2	£70	£50			

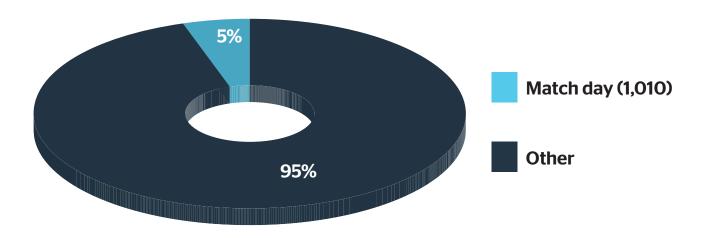
PCN levels in London from July 2007						
Band Higher level penalty Lower level p						
1	£120	£80				
2	£100	£60				
3	£80	£40				

Match Days

A number of zones are subject to match day restrictions when first team Watford FC matches are played at the Vicarage Road Stadium. These games may take place on Saturdays, weekday evenings, Sundays or bank holidays.

The number of home fixtures requiring enforcement will vary from season to season depending upon the clubs success in cup competitions or the league that they are in. Fewer fixtures apply in the Premier League because there are fewer teams.

Of the 22,207 penalties issued during 2016/17, the following were issued on match days:



A total of 20 fixtures were subject to match enforcement during 2016/17 and 1,010 penalties were issued. This information relates to the football season taking place between August 2016 and May 2017.

4,803 Watford Football Club fixtures were hand-delivered to Controlled Parking Zone residents.

83 Controlled Parking Zone entry match day sign plates were changed regularly throughout the year to inform motorists when fixtures were being played and match day restrictions applied.

Penalties Issued by Contravention

The number of PCNs issued during 2016/17 for the main on-street and off-street parking contraventions is shown opposite;

On street contraventions & codes	Number
O1 - Parked in a restricted street (yellow lines)	7,448
O2 - Parked where loading/unloading is not permitted	1,344
O5 - Parked after expiry of pay and display ticket.	928
06 - Parked without a valid pay and display ticket/voucher	1,508
12 - Parked in a permit/shared use bay without permit/voucher/ticket	4,854
19 - Parked in permit/shared use bay with an invalid permit/voucher/ticket	2,708
25 - Parked in a loading place without loading.	1,164
27 - Parked adjacent to a dropped kerb	202
30 - Parked for longer than permitted	344
40 - Parked in a disabled bay/space without valid blue badge	542
47 - Parked at a bus stop or stand	172

Off street contraventions & codes	Number
82 - Parked after expiry of paid for time	123
83 - Parked in a car park without a valid ticket/voucher	556
84 - Parked with additional payment to extend stay (meter feeding)	18
85 - Parked in a permit bay without displaying valid permit	194
86 - Parked beyond bay markings	164
87 - Parked in a disabled bay without a valid blue badge	72
91 - Parked in area not designated for that class of vehicle	50

Challenges, Representations and Appeals

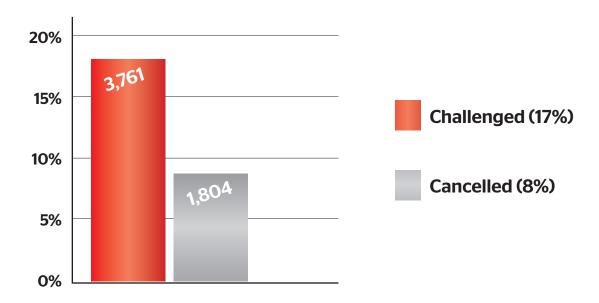
"The process of considering challenges, representations and defence of appeals is a legal process that requires officers dealing with these aspects to be trained in the relevant legislation and how to apply it."

> (Department for Transport Traffic Management Act 2004) Operational Guidance to Local Authorities)

Informal Challenge

Written correspondence received following the initial issue of the penalty, usually within the first 14 days, is regarded as an "informal" challenge.

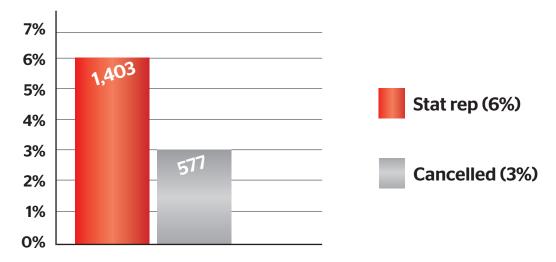
Of the 22,207 penalties issued during 2016/17, the following were subject to informal challenge and cancellation:



Statutory Representation

Motorists are served with a Notice to Owner document if the initial penalty charge is not paid or challenged. This document allows "formal" representations to be made against the issue of the penalty on a number of statutory grounds, or where other mitigating circumstances may apply.

Of the 22,207 penalties issued during 2016/17, the following were subject to statutory representation and cancellation:



Traffic Penalty Tribunal Appeals

Motorists are issued with a statutory Notice of Rejection when formal representations made to the council are not accepted. The Notice is accompanied with a form allowing them to refer their case to the Traffic Penalty Tribunal in order to appeal against the council's decision. A final binding decision will be made by an independent adjudicator.

The Traffic Penalty Tribunal may allow or dismiss an appeal and recognises that local authorities may not contest appeals on occasion, primarily when additional evidence comes to light during the appeals process.

Of the 22,207 PCN's issued in 2016/17:

- 1. 45 were the subject of an appeal to the Independent Parking Adjudicator an appeal rate of 0.20%.
- 2. Of these 45 appeals, 10 (22%) were upheld by the adjudicator (33% including those not contested by the council) and 30 (67%) were rejected by the adjudicator (won by the council).

The following tables illustrate Watford Council's performance at appeal in 2015/16 and 2016/17:

Appeals 2016/17	No. of appeals	Rate of appeal per PCN	Not contested by council	Allowed by Adjudicator	Allowed by Adjudicator inc. not contested	Refused by Adjudicator (council win)	Awaiting decision
Watford	45	0.20%	11%	22%	33%	67%	0%
Appeals 2015/16	No. of appeals	Rate of appeal per PCN	Not contested by council	Allowed by Adjudicator	Allowed by Adjudicator inc. not contested	Refused by Adjudicator (council win)	Awaiting decision
Watford	68	0.28%	22%	26%	48%	51%	0%

Cancellation by Reason

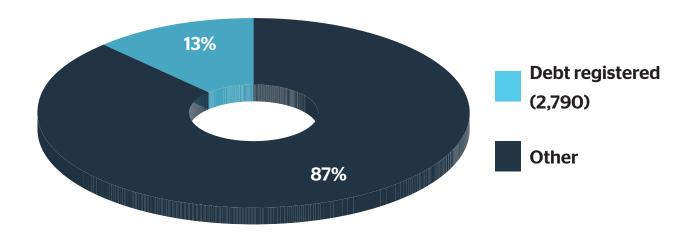
Principle reasons for cancellation of Penalty Charge Notices during 2016/17 are shown below:

Reason for Cancellation	Number of penalties cancelled
Disabled badge - first contravention	463
Council decision	95
Valid Pay and Display ticket produced	290
CEO error	127
Valid permit/season ticket produced	303
Processing errors	11
Loading evidence provided	60
Other evidence provided	113
Signs and lines defects	5

Debt Recovery & Bailiffs

If a penalty is not paid or successfully challenged the statutory process allows for the case to become registered as a debt at the Traffic Enforcement Centre (Northampton County Court). The motorist is served an Order for Recovery and is liable for full payment of the outstanding penalty and the additional court registration fee. Alternatively, a witness statement may be filed only if one of the four outlined grounds is applicable.

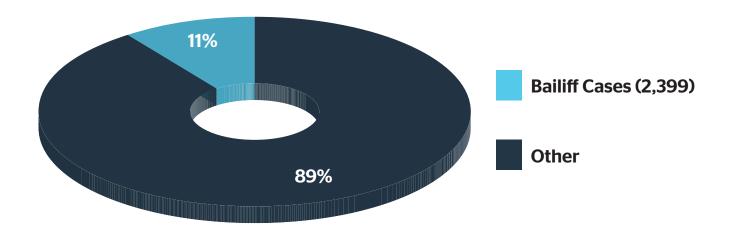
Of the 22,207 penalties issued during 2016/17, the following were registered as a debt:



The final stage of the Traffic Management Act 2004 statutory process allows Local Authorities to apply to the Traffic Enforcement Centre for the authorisation of a warrant to enable Enforcement Agents (formerly bailiffs) to recover the debt. By the time that a case is passed to an Enforcement Agent the following statutory notices will have been served to the motorist:

- Penalty Charge Notice (14/28 days to respond)
- Notice to Owner (28 days to respond)
- Notice of Rejection (28 days to refer case to independent Traffic Penalty Tribunal)
- Charge Certificate (14 days to respond)
- Order for Recovery/Witness Statement (21 days to respond)

Of the 22,207 penalties issued during 2016/17, the following were referred to Enforcement Agents (formerly bailiffs):

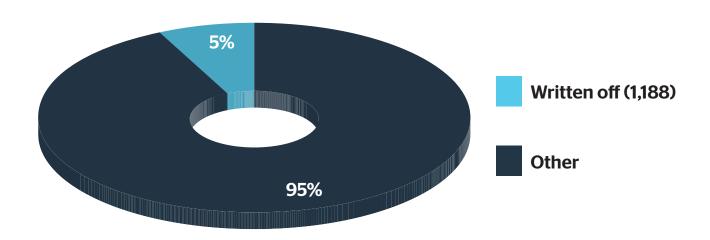


A total of £73,506 has been recovered through Enforcement Agent action in 2016/17.

At the stage that a case is passed to the Enforcement Agent for recovery the motorist becomes additionally liable for the payment of their fees, which are set and capped by statute (Taking Control of Goods (Fees) Regulations 2014), as outlined below:

- Compliance stage £75
- Enforcement stage £235
- Removal stage £110

Of the 22,207 penalties issued during 2016/17, the following were written off:



It is generally expected that 30% of cases subject to Enforcement Agent action will be recovered. The recovery rate in Watford during 2016/17 was an average of 35%.

From January 2015, Watford added Newlyn PLC to our contract of instructed Enforcement Agents, which continues to include Marston Group and Equita PLC.

Further information regarding the governing requirements applicable to Enforcement Agents can be found at the following websites and links:

gov.uk (Bailiff and Enforcement Agents: National Standards 2014)

gov.uk/government/publications/bailiffs-and-enforcement-agents-national-standards

legislation.gov.uk (Taking Control of Goods (Fees) Regulations 2014)

legislation.gov.uk/uksi/2014/1/contents/made

Financial Information

"CPE is a means of achieving transport policy objectives...but raising revenue should not be an objective of CPE, nor should authorities set targets for revenue or the number of Penalty Charge Notices they issue"

> (Department for Transport Traffic Management Act 2004) Operational Guidance to Local Authorities)

The income from on-street charging, which includes all Controlled Parking Zone scheme permits and vouchers etc. and all on and off-street Penalty Charge Notices is ring-fenced and must only be used in accordance with the provisions of section 55 of the Road Traffic Regulation Act 1984 (as amended). This restricts the use of any surplus generated strictly to re-investment in the service or other transport related purposes, which commonly includes the improvement, extension and maintenance of the existing parking schemes, car parks and infrastructure as well as funding new parking restrictions that are requested by residents, members and the emergency services.

The aim of the Parking Service is to ensure that it is self-financing and sustained by the revenue that it raises so that it does not seek support from local taxpayers. However, it is intended that the charges remain proportionate and are not set at unreasonable levels.

On-Street

Year	Contract costs - (net of income recovered from TRDC and Dacorum)	Staffing, supplies & other costs	PCN income	Permit Income	Pay & Display income On Street	(Surplus)/ Deficit
2006/07	677,984	386,765	(602,007)	(214,197)	(416,633)	(168,088)
2007/08	681,459	444,684	(592,963)	(199,699)	(473,335)	(139,854)
2008/09	672,341	442,956	(625,518)	(209,322)	(482,494)	(202,037)
2009/10	683,393	605,736	(773,374)	(214,943)	(470,230)	(169,417)
2010/11	686,486	564,079	(559,381)	(213,127)	(446,739)	31,318
2011/12	696,052	459,509	(544,471)	(221,034)	(461,413)	(71,357)
2012/13	758,432	521,468	(558,314)	(244,982)	(482,471)	(5,867)
2013/14	751,926	603,780	(627,455)	(261,920)	(499,914)	(33,583)
2014/15	815,158	508,522	(673,969)	(272,858)	(282,673)	94,180
2015/16	780,485	654,329	(609,604)	(299,570)	(313,862)	211,778
2016/17	724,746	661,435	(835,022)	(312,319)	(287,620)	(48,780)

Off-Street

Year	Contract costs	Staffing, supplies & other costs	PCN income	Three Rivers & Dacorum	Pay & Display income Off Street	(Surplus) / Deficit
2009/10	152,324	33,007	(67,250)	(92,898)	incl in on street	25,183
2010/11	256,359	29,756	(48,642)	(196,665)	incl in on street	40,808
2011/12	183,370	23,669	(47,346)	(122,843)	incl in on street	36,850
2012/13	167,175	24,658	(48,549)	(101,224)	incl in on street	42,060
2013/14	164,534	23,365	(40,050)	(116,538)	incl in on street	31,311
2014/15	146,549	21,372	(43,019)	(94,518)	(260,318)	(229,934)
2015/16	140,143	28,584	(45,884)	(81,397)	(241,905)	(200,459)
2016/17	152,507	21,305	(53,299)	(106,247)	(219,970)	(205,704)

It is a commonly held belief that parking enforcement is a purely revenue raising exercise; however it will be seen that (in common with many smaller local authorities) Watford Borough Council does not break even on its enforcement activities, alone.

However, the above deficit is effectively made good from the income from off-street pay and display parking, permit charges and management fees from Dacorum Council and Three Rivers Council for hosting and managing the parking contract.

Future Plans & Summary

During 2017/18 the council intends to review the current charges in the car parks it directly manages and controls to determine whether amendments are necessary to fully fund the operating costs of the sites. Any changes to tariffs will be introduced at the beginning of the year.

The council has been in discussions with Hertfordshire County Council (HCC) regarding HCCs proposal for a Public Realm enhancement scheme on the section of Clarendon Road fronting the Palace Theatre in the town centre. In order to address formal objections to the proposals, HCC has requested that the Borough Council develop a parking management scheme for Watford House Lane, a private road connecting to Clarendon Road. The council will progress this scheme during 2017/18.

A major redevelopment of the Charter Place shopping centre in the town centre has stimulated the council to bring forward plans for a Public Realm enhancement scheme for the section of the High Street which fronts the new development. Although plans for the council sponsored scheme are still at an early stage, the council is aiming to develop and consult on proposals and implement the scheme to coincide with the opening of the new Charter Place in late 2018. It is expected that the final scheme will result in changes to parking & traffic management arrangements in and around the town centre and these changes will be taken forward in parallel with the design work on the Public Realm scheme.

During2016/17, the council worked with HCC to secure funds to carry out an enhancement scheme to the Goodwood Parade shops in Courtlands Drive. The scheme is programmed to be constructed during 17/18 and a small number of additional parking bays are due to be built as part of the scheme. It is intended that these bays will be managed to limit the length of stay to 1 hour during the working day to ensure turn-over to the benefit of the shops. The traffic order to support this limited stay provision will be progressed once work on site is substantially complete in the latter part of 2017/18.

Each year the council receives a large number of requests for minor changes to parking controls in the borough. In order to address these requests more rapidly the council has brought in additional staff resources. It is now intended to investigate and where appropriate design minor schemes for consultation & implementation within 6 months of receipt of report/request.

A review of the channels used by customers contacting the Parking Service has shown a steady decline in the numbers visiting the Parking Shop to transact business face to face whilst on-line & telephone contact has increased. To reflect this migration, the council is proposing to progressively reduce the opening hours of the Parking Shop with a view to full closure if migration to the alternative channels successfully accommodates customer preferences. The programme will be subject to review and is being managed against the background of a relocation of the Parking Service from its current operating base in Market Street to new premises within the Town Hall when the lease on the current premises expires. When implemented this move will realise significant savings and will also support greater integration with other council services.

The council's Parking Enforcement Contract is due to expire in spring 2018 and work commenced on the procurement of the new contract in 2016. This work will continue through 2017/18 with the new contractor programmed to be appointed towards the end of 2017 in advance of the new contract commencing in April 2018. As part of the procurement process, the council is reviewing current operations to identify areas where efficiencies can be made. As part of this it will be exploring the feasibility of introducing 'virtual' permits.

Looking further ahead, major developments and infrastructure schemes in the borough, in particular the Hospital Campus Development, Metropolitan Line Extension, Western Gateway and Watford Junction/ Clarendon Road are likely to be the stimulus for revisions to parking controls in the affected areas to reflect changing demands brought about by those schemes. Challenging housing targets set for the borough by Government are likely to increase on-street parking pressures and a review of policies to manage these pressures is programmed to commence during 2017/18

"Once authorities have finalised their parking enforcement policies, they should publish and promote them openly."

> (Secretary of State's Statutory Guidance to Local Authorities on the Civil Enforcement of Parking Contraventions)

