

## Slough Borough Council

<b>Report To:</b>	Cabinet
<b>Date:</b>	16 June 2025
<b>Subject:</b>	Parking and Traffic Enforcement Review
<b>Lead Member:</b>	Cllr Paul Kelly - Highways, Housing and Transport
<b>Chief Officer:</b>	Pat Hayes - Executive Director Regeneration, Housing and Environment
<b>Contact Officer:</b>	Matthew Hooper – Director Environment and Highways
<b>Ward(s):</b>	All
<b>Key Decision:</b>	YES
<b>Exempt:</b>	NO
<b>Decision Subject To Call In:</b>	YES
<b>Appendices:</b>	Appendix A – Revised CPZ Policy Appendix B – EIA Civil Enforcement Officer Increase Appendix C – EIA Moving Traffic Enforcement Appendix D – <u>Exempt Appendix</u> – Contract Financials Appendix E – Moving Traffic Enforcement Consultation Summary (to follow on 10 <sup>th</sup> June)

### 1.0 Summary and Recommendations

- 1.1 Following Cabinet approval in 2023, SBC has progressed with implementing more Controlled Parking Zones (CPZs) in Slough. This is to allow Slough more opportunity to better manage the highway network and in particular to stop the abuse of unrestricted roads by airport users, commuters and online car sales businesses.
- 1.2 In 2018/19, when SBC began working with its Parking Contractor (SABA) around 130km of our roads had parking restrictions of any sort. In 2025, following the implementation of several new CPZs, the combined length of restricted roads has almost doubled to around 235km. However during this time the number of Civil Enforcement Officers (CEOs) SBC employs via SABA has remained static at 13. There are ten new CPZs planned for imminent implementation this year with more following.
- 1.3 Following multiple Traffic Regulation Order consultations (required prior to implementation of a CPZ) Slough residents have offered consistent feedback that they don't feel the existing parking restrictions are being enforced adequately. For

some, this is a reason they object to CPZs because they feel they will pay for their permit but may not see improved levels of parking control. In summary, residents have offered consistent feedback on the following issues:

- 1.3.1 Insufficient levels of enforcement
- 1.3.2 Vehicles receiving numerous tickets but remaining on street
- 1.3.3 The cost of the first resident parking permit being too high at £75; and the allocation of two resident permits per household is insufficient

- 1.4 In relation to para 1.3.1 above it is now necessary to modify the Saba Parking enforcement contract for the remainder of the contract period (3 years) to deliver greater levels of parking enforcement across Slough.
- 1.5 In relation to para 1.3.2 officers are seeking approval to for an additional modification to the SABA contract to allow SABA to provide a persistent evader vehicle removal service to deal with vehicles which receive multiple parking tickets but do not pay them.
- 1.6 In relation to 1.3.3 it is proposed that the cost of the first resident permit is reduced from £75 to £50 and that households are able to apply for three parking permits as standard.
- 1.7 In addition to the above parking related issues, it is essential that Slough take measures to better manage congestion on its road network and improve air quality. The Traffic Management Act 2004 gives powers to Local Highway Authorities to undertake enforcement in respect of Moving Traffic contraventions in their areas. This means traffic enforcement cameras can be used to enable the Council to enforce a variety of existing traffic restrictions on the borough's roads, to help improve safety and reduce congestion. These restrictions were previously only enforceable by the police and by London Local Authorities but Authorities outside London are now able to apply to the Department for Transport to exercise these powers. Relevant contraventions include driving through a 'No Entry' sign, turning left or right when instructed not to do so (i.e. banned turns), entering yellow box junctions when the exit is not clear, driving where and when motor vehicles are prohibited and school streets.

## **Recommendations:**

Cabinet is recommended to:

- (a) Delegate to the Executive Director of Regeneration, Housing & Environment, in consultation with the Lead Member for Highways, Housing and Transport the issuing of a modification to the Saba Parking contract to allow the recruitment of 20 additional CEOs at a maximum pro rata value of £640,000 this year and £1,209,811 in subsequent years.
- (b) To approve the reduction in the cost of the first resident permit for each household from £75 to £50 per year at a total cost to SBC of £29,450.
- (c) To approve the change in policy to allow up to three resident parking permits for each household within a CPZ as standard.

- (d) To approve a credit of £25 to the accounts of residents who purchased a £75 first parking permit from 1<sup>st</sup> April 2025, at a total cost to SBC of £4,950.
- (e) Delegate to the Executive Director of Regeneration, Housing & Environment. in consultation with the Lead Member for Highways, Housing and Transport, the issuing of a modification to the current contract with Saba Parking to allow them to undertake vehicle removal and storage services in line with all relevant parking and removal vehicle regulations, at a cost of £11,750 in year one and £1,000 in years two and three.
- (f) Delegate to the Executive Director of Regeneration, Housing & Environment. in consultation with the Lead Member for Highways, Housing and Transport, the issuing of a contract modification to Saba Parking for implementation of Moving Traffic Enforcement, at a cost of £45,100 in year one and £75,200 in years two and three. .
- (g) Approve commencement of work to submit the application for Moving Traffic Enforcement (MTE) powers to the Secretary of State for Transport by 7 July 2025.
- (h) Approve the MTE sites identified in the Consultation report (Appendix E) for implementation subject to DfT approval.
- (i) Delegate authority to the Executive Director of Regeneration, Housing and Environment, in consultation with the Lead Member for Highways, Housing and Transport, to agree new MTE locations in the future.

### **Reason:**

Section 16 of the Traffic Management Act 2004 places a duty on all Local Authorities to take necessary steps to improve traffic flow and reduce congestion on the local road network. The recommendations within this report are all aimed at improving traffic flow, reducing congestion and improving safety.

### **Commissioner Review**

This report is outside the scope for pre-publication commissioner review; please check the [Commissioners' instruction 5 to CLT to sign off papers](#) for further details.

## **2.0 Report**

### **2.1 Increased Parking Enforcement – Civil Enforcement Officers**

- 2.1.1 The Council under the Traffic Management Act 2004 (TMA 04) is an approved authority for managing parking restrictions under “decriminalised parking”. In 2003 the Council tendered a new contract to manage decriminalised parking enforcement on its behalf, taking the responsibility away from the police. The contract included provision of 13 parking attendants (now referred to as CEOs).
- 2.1.2 In 2018 the contract was awarded to Vinci Park (now called Saba Parking). The contract was awarded for an initial duration of five years with the option to extend for up to another five years. The value of the awarded contract was £1.6m and since that time, due to RPI increases the contract price has increased to £2.4m annually. There have been no contract modifications to expand the scope of the

contract since the original contract was awarded. The contract still maintained the deployment of 13 CEOs, to enforce the whole borough. Since 2018 a number of new restrictions have been placed on the highway and the service has managed the enforcement of these new restrictions, however it is not operationally possible to visit every location daily which is causing a large number of parking contraventions to go unaddressed.

2.1.3 As an indicator of the level of parking non-compliance in Slough, the quarterly contract management meetings with Saba have shown that for each of the 13 CEOs deployed on the contract, the average hourly issuance rate is 1.7 PCNs per hour, per officer. To be clear, this is the level of issuance achieved by Saba without any target being set by SBC. Local Authorities are prohibited from setting PCN targets under the Traffic Management Act. Issuance rates are, however, a valid indicator of the level of parking non-compliance in a given area and 1.7 would be considered high given 1.2 to 1.3 per hour is more typical. Considering that in addition to this the number of PCNs issued has been increasing year on year and we still receive a significant amount of resident and member casework regarding parking issues, there is sufficient evidence to suggest greater levels of enforcement are required. In addition, the Parking Service implemented nine new CPZs last year and plan to implement ten more this year, along with new charges in nine car parks.

## 2.2 Removal of Persistent Evader Vehicles from the Highway

2.2.1 The Council has a network management duty under the Traffic Management Act 2004 (TMA 04) to manage its network for the expeditious movement of traffic across the network. Under part 6 of the TMA 04 Slough Borough Council has the powers to enforce parking regulations on the public highway.

2.2.2 The aim of parking enforcement is to enable all residents and visitors to the borough to use local roads unhindered by the dangerous or inconsiderate parking of others. In a busy, urban area like Slough - which has several arterial routes serving the business areas as well as part of the major route network, it is important to regulate parking so that movement of traffic and sustainable travel are maintained.

2.2.3 The removal of illegally parked vehicles from the highway will contribute to improvements in traffic flow, address access problems for emergency services and waste collection vehicles, encourage sustainable travel and address anti-social behaviour problems linked to inconsiderate parking.

## 2.3 Resident Permit Costs and Allocations

2.3.1 All residents within a CPZ must purchase parking permits annually. Households are permitted to purchase up to two permits, with the option of a third permit in exceptional circumstances and where there is sufficient kerb capacity.

2.3.2 The current cost of a first permit is £75 and the second permit is £125, where third permits have been granted in exceptional circumstances they have been charged at £250.

2.3.3 In order to properly respond to consultation findings, it is proposed that the CPZ Policy is amended to reflect a reduction in the price of a first permit to £50 and that households can apply for up to three permits as standard. However, the revised policy will still state that in certain areas with limited kerb capacity the number of permits allowed per household will be limited to fewer than three.

## 2.4 Moving Traffic Enforcement Powers

- 2.4.1 The aim of moving traffic enforcement is to enable all residents and visitors to the borough, to use local roads unhindered by the dangerous or inconsiderate driving of others. In a busy urban area like Slough, which has several arterial routes serving the business areas as well as part of the major route network, it is important to manage traffic so that movement of vehicles and sustainable modes are maintained.
- 2.4.2 The management of vehicles entering areas enforced under MTE will contribute to improvements in air quality and traffic flow, provide safer streets around schools and neighbourhoods, address access problems for emergency and public services, encourage sustainable travel and address anti-social behaviour problems linked to inconsiderate driving.
- 2.4.3 In line with the guidance set out by the DfT and to ensure fairness, warning notices will be issued to all drivers committing a first offence within the first six months of the scheme being implemented. Thereafter, penalty charge notices (PCN's) will be issued.

### **Local Policies:**

- **The Corporate Improvement and Recovery Plan. Corporate Plan 2023-27 (A fresh start)**
  - i. ***A town where residents can live healthier, safer and more independent lives:*** more robust management of the highway will discourage inconsiderate driving and parking which causes obstruction to traffic and compromises safety of all pedestrians & cyclists. This will contribute to improvements in residential areas and enable better access to e.g. emergency services and street cleansing vehicles.
  - ii. ***A cleaner, healthier and more prosperous Slough.***  
By more effectively managing the number of cars parking in restricted zones, we will help deliver safer routes to places of work, shopping, schools and neighbourhoods.
  - iii. ***A council that lives within our means, balances the budget, and delivers best value for taxpayers and service users:*** the proposals detailed in this report aim to provide the very best value for money to ensure compliance on the highway and improve safety for our residents. In addition we have reduced the cost burden of CPZs on our residents through the first permit discount of £25.
  
- **The Local Transport Plan 3**
  - i. This is the over-arching plan for the provision of transport services and infrastructure at a local level, across the borough. The current version (LTP3) is currently under review but will continue to focus on promoting sustainable travel, tackling road safety and improving the public realm.

## Options considered: -

### Option 1: Continuation of current approach

This would result in areas around the borough not being enforced on a daily/regular basis and Slough becoming more congested with slower journey times and deteriorating air quality. The continuation with current operational arrangements would also result in more CPZs being opposed on the basis that there is insufficient enforcement to convince residents CPZs are worthwhile and lead to safer, better managed streets. **This option is not recommended.**

### Option 2: Enhanced Operational Approach

By modifying the parking enforcement contract to allow for greater numbers of CEOs, the facility to remove persistent evader vehicles from the highway and the ability to enforce against those committing moving traffic offences we will enable the Council to better manage Slough's highway network, reducing congestion, providing safer neighbourhoods and reducing inconsiderate parking around the borough. As the CPZ rollout continues to be implemented we will need increasing levels of resource to show residents that the CPZs are effective. The level of CEOs and their productivity will be closely monitored to ensure we do not exceed the required number of CEOs in relation to the level of demand. The cost of the additional measures proposed are fully offset by income and therefore lead to no pressure on the general fund. **This option is recommended.**

## 3. Background

### Increased Parking Enforcement - Civil Enforcement Officers

- 3.1 Slough gained permission from the Secretary of State for Transport in 2003 to manage all decriminalised parking enforcement for the borough, this has enabled Slough to meet the requirements set out in the Traffic Management Act 2004 with regard to parking and expeditious movement on the highway network. These powers allow the Council to provide improved access for all, deal with social / environmental problems and support communities and the business sector.
- 3.2 Effective enforcement of parking restrictions in the Borough reduces congestion on the highway, improves road safety and assists in keeping the road network clear. Before 2003, enforcement of restrictions was managed by Thames Valley Police.
- 3.3 The initial contract let in 2003 has been revised and updated to meet the needs of Slough by updating the code of practice, setting robust key performance indicators (KPIs) which are monitored every month and reviewed annually. These KPIs have included the daily deployment figures to ensure that the minimum number of 13 officers are deployed daily. The number of CEOs employed by Saba Parking is slightly higher to cater for leave, training and shift patterns.
- 3.4 The daily deployment figures have stayed static for more than 20 years but with the increase in CPZs and new restrictions around developments, this has led to the contractor being overly stretched to meet the demands of enforcement in the borough.
- 3.5 To support the rollout of further CPZs and also manage the existing zones, it is proposed the daily deployment be increased incrementally by a further 20 CEOs

taking the daily deployment to 33 officers. The increase in CEOs will enable the contractor to deploy more officers to multiple hot spots on a daily basis, without reducing focus on other locations around the borough.

- 3.6 In relation to contract and financial management, officers have discussed in detail with Saba the likely number of PCNs that will be generated from the additional CEOs. The additional enforcement is expected to result in a further 70,000 PCNs per year being issued in addition to the current number of PCNs, this is subject to the CPZs continuing to be implemented. If approved, the Persistent Evader policy will help increase the percentage of PCNs paid.
- 3.7 As a result of the additional PCNs being issued it is expected that the number of appeals will increase and therefore additional Council Appeals Officers within the parking service will need to be increased to two officers to manage the statutory timelines set by the adjudication service (PATROL) and government.
- 3.13 All additional income/surplus generated from enforcement must by law be re-invested in highway management initiatives.
- 3.14 Full costs in relation to increasing the number of CEOs provided through the Saba Parking contract are set out in the Exempt Appendix to this report.
- 3.15 In addition to Saba's costs, a further two level 5 posts (Appeals Officers) will be needed to manage the increase in PCNs issued, the cost of these two posts combined is £85,000 and takes into account the Moving Traffic Enforcement and Persistent Evader policies that will come into effect this financial year subject to approval.
- 3.16 The costs for the internal and external staff will need to be carefully managed to ensure that the operational costs of the contract do not exceed the PCN income. Therefore, it would be prudent to employ staff on fixed term contracts to limit any future decline in PCNs resulting from compliance.

### **Resident Permit Costs and Allocations**

- 3.17 Based on all permits issued between April '24 to March '25 in the currently live CPZs, the council issued 1,587 permits in total. Breaking this down, we issued 1,178 1<sup>st</sup> permits, 379 2<sup>nd</sup> permits and 30 3<sup>rd</sup> permits. The total income from all permit sales was £143,225. If we reduce the price of the first permit to £50, the total value of first permits will reduce to £58,900 – a reduction of £29,450.

	No issued April '24 to March '25	Income £	Income if First Permit @ £50	Difference £
<b>1st Permit (£75)</b>	1,178	88,350	58,900	-29,450
<b>2nd Permit (£125)</b>	379	47,375	47,375	0
<b>3rd Permit (£250)</b>	30	7,500	7,500	0
<b>TOTAL</b>	<b>1,587</b>	<b>143,225</b>	<b>113,775</b>	<b>-29,450</b>

- 3.18 If the recommendations are approved, from the date of the cabinet meeting all new CPZs will be implemented with the new permit charges and allowances.
- 3.19 In the interests of fairness, it is proposed that any resident who purchased a £75 first permit from 1<sup>st</sup> April 2025 will receive a credit on their account of £25 which

they can claim the next time they renew a permit. 198 accounts renewed a 1<sup>st</sup> permit from 1<sup>st</sup> April meaning the total value of the £25 credits will be £4,950.

- 3.20 The total cost of the parking permit proposals in this report therefore come to £34,400.
- 3.21 With regard to permit allocations, it is difficult to accurately forecast how many additional 3<sup>rd</sup> permits will be purchased once the changes proposed in this report are introduced. The Council does not hold data on the number of private vehicles in the borough therefore it is difficult to anticipate an accurate estimate for the number of third permits which will be purchased.
- 3.22 Given the total cost to SBC is £34,400 this can be reflected as equivalent to the value of 138 3<sup>rd</sup> permits. We can therefore proceed with relative confidence that a significant proportion of the costs will be mitigated through the sale of 3<sup>rd</sup> permits. As the implementation of Controlled Parking Zones continues, due to the new permit allocations we will see the number of permits purchased increasing beyond the currently anticipated levels which will likely more than mitigate the costs.

### **Removal of Persistent Evader Vehicles from the Highway**

- 3.23 With regard to the removal of persistent evader vehicles, parking enforcement is governed by a statutory process. Motorists who contravene parking restrictions can be issued a PCN and have the opportunity to either pay the penalty or appeal the charge. The liable person is the registered keeper of the vehicle and there is a statutory process to follow in relation to issuing notices.
- 3.24 The number of persistent evader vehicles that remain parked on the highway is putting pressure on the parking service and impacts on those who seek to use the highway lawfully. It can also lead to dangerous situations and prevent planned maintenance works continuing. The Department for Transport statutory guidance contains guidance on persistent evaders. This recommends that local authorities adopt strong enforcement policies against such individuals.
- 3.25 The introduction of a removal service will better enable the Network Management team to:
- prioritise parking for residents within the enforcement hours of operation.
  - reduce issues such as obstructive and inconsiderate parking especially at junctions, bends and on footways.
  - control the number of cars parking on the highway
  - contribute to better neighbourhoods by reducing congestion on the highway and clearing the road network
- 3.26 The Council is also seeking to remove vehicles which do not belong to persistent evaders, but which are parked at locations where traffic flow is hindered, causing an obstruction or danger for other highway users or where the vehicle is parked on the basis it has a disabled blue badge, but that this is being misused and therefore preventing legitimate use by another driver.
- 3.27 The new policy also provides for the “disposal” of the vehicle if the owner does not recover the vehicle. In some circumstances the vehicle can be sold at auction at market value. If there is no intrinsic value, then the vehicle will be sent for disposal.
- 3.28 The authority’s current parking contract allows for this service to be delivered at no

additional management fee as this service is related to the current contract and systems are already in place for the processing and collection of income relating to PCNs that have been issued by the contractor.

- 3.29 Saba will overall be responsible for this service as part of the variation of the contract, however the removals and storage of vehicles will be subcontracted to AV Contractors, based in Iver. The site has been visited to ensure it complies with our requirements, the specification for this service and the process for payment and collection of vehicles. The regulation for this service is statutory. Saba is an experienced company and understands this service as they provide it to other clients.
- 3.30 There will be no additional cost to the Council by the Removal Contractor as costs will be retrieved from the vehicle owner. Where vehicles are not collected after the statutory period, depending on the condition they will either be auctioned or disposed of. The removal contractor understands that on occasions the sale cost may not cover the full charge and has agreed to this in writing and will carry the risk. As stated above, the purpose of the regime is to reduce persistent evaders and vehicles causing an obstruction as opposed to seeking to generate revenue.
- 3.31 Council officers have spoken to two neighbouring authorities who have procured this service via their parking contractor. A visit was also made to a Hampshire authority to understand the risk and costs as they run their service in house and have confirmed whilst the service was cost neutral, they are only able to manage this due to the size of team they have for parking. Both authorities visited pay a management fee in addition to the contractor receiving the removal charges. This provides evidence that procuring via open tender is unlikely to deliver best value. The current contractor is prepared to offer the service without an additional management fee due to the current systems already being in place.
- 3.32 The cost to Slough to set up the service will be £11,750 in year one and £1,000 in years two and three. This cost is for five phones which will be integrated with the parking system to allow raising removals from the highway and all parties involved will have access to the live system. Four body cameras will be required for the AV Contractors in order to: (a) capture evidence should there be any conflict on street and (b) record condition of vehicles prior to removal, this is part of the statutory process. All evidence will be stored by Saba as part of contract requirements under GDPR regulations.
- 3.33 The recommendation in this report seeks to modify the existing contract with Saba Parking to allow them to undertake vehicle removal and storage on behalf of SBC. The recommendation in the previous cabinet report (December 2024) was to commence procurement of a removal and disposal company provider. The proposal to modify the existing contract is likely to be the most cost-effective arrangement for the removal and storage of the vehicles as no separate or additional systems are required.
- 3.34 The expansion of the scope of the contract to include vehicle removal and storage has a small impact on the contract value. The proposal is to implement the change from May 2025 through to the end of the contract in April 2028. The cost of implementation of the contract will be £11,750 with an additional annual cost of £1,000 in years 2 and 3.

- 3.35 The total additional cost of the contract is to increase by £11,750 in year 1 and £1,000 in years 2 and 3 of the contract as a result of these recommendations. There are a number of previous decisions whereby the Council had agreed to vary the scope of the SABA contract with an inferred increase in the Contract cost but this was not reflected in the recommendations of those reports to change the contract value. The service is finalising a report that will seek to extend the length of the contract and regularise the contract value.
- 3.36 The previous decision determined that the Council would fund the cost of the removal service through the parking revenue budget. It is estimated that between 100-150 vehicles would be removed per financial year at an estimated initial cost to the Council of £150k, and that the scheme would generate an annual income of £165k generating a potential small surplus of £15k per year to cover administration costs.
- 3.37 The current proposal is clearer and passes the financial risk on to the contractor. They will therefore want to ensure that the most cost-effective arrangements are in place for the removal and storage of the vehicles. Whilst the registered keeper should be responsible for the cost of recovery and storage, the terms of the contract may mean that these costs together with the cost of disposal fall to the contractor if the vehicle is not reclaimed. It is improbable that the car can be reclaimed if fraudulent documents have been used and in these circumstances the contractor will need to bear the costs and ensure that these are minimised by an effective disposal approach.
- 3.38 PCN charges will be payable directly to the Parking account. There will be cases whereby the vehicle is not collected; the vehicle will then be disposed of and any income will first offset the contractor's costs. Should there be any remaining surplus this will be retained by the contractor. This will need to be monitored through the remaining term of the contract such that an informed decision can be taken when considering the scope of a new procurement to be completed by 2028.
- 3.39 Parking income forms part of a ringfenced parking account and can only be used for prescribed purposes. This includes the provision of off-street parking accommodation, public passenger transport services and highway or road improvement projects.

### **Moving Traffic Enforcement**

- 3.40 In 2022, the Government granted powers to make moving traffic Enforcement powers (under Part 6 of the Traffic Management Act 2004) available to local authorities outside of London and Wales.
- 3.41 Before this date, enforcement of moving traffic restrictions outside London and Wales such as yellow box junction markings, banned turns, access restrictions etc. could only be carried out by the Police.
- 3.42 To be granted the powers, local authorities are required to make an application to the Secretary of State for Transport requesting for the borough to be designated as Civil enforcement area for moving traffic enforcement under Part 6 of the TMA 2004. The borough will also need to demonstrate that they have completed some of the prerequisite requirements set out by the Department of Transport (DfT) within their published guidance. These are as follows:

- Consulted the appropriate Chief Officer of Police.
- Carried out a minimum six-week public consultation on the detail of planned civil enforcement of moving traffic contraventions (rather than whether people agree with the principle of moving traffic enforcement), including the types of restrictions to be enforced and the location(s) in question.
- Considered all objections raised and has taken such steps the council considers reasonable to resolve any disputes.
- Carried out effective public communication and engagement as the council considers appropriate.
- Ensured all moving traffic restrictions to be enforced will be underpinned by accurate TROs, where applicable, and indicated by lawful traffic signs and road markings.
- Ensured all the relevant equipment has been certified by the Vehicle Certification Agency (VCA) specifically for moving traffic contraventions.
- As part of ensuring that TROs and traffic signs are accurate and lawful, applicant local authorities are encouraged to take the opportunity to identify and remove any signs that are either obsolete or no longer necessary, whether or not relating directly to the restriction being enforced.

3.43 The DfT have also set out guidelines in the form of statutory guidance that local authorities should follow when deciding where to use traffic enforcement cameras. Key requirements include:

- A survey of the existing road layout particularly road signs and markings to determine if they are visible or potentially confusing to motorists. This should also determine whether the restriction can be readily adhered to.
- A determination of compliance levels observed or recorded at the location. This could come from several sources including accident data or police records or surveys. It would not be necessary or cost effective to install a potentially expensive camera in a location if compliance levels were already generally good.
- A minimum six-week public consultation about the placement and use of each proposed enforcement camera will also be required in advance. This could also pick up feedback and observations from the public/highway users about traffic behaviour at the location and might indicate alternative solutions would be preferable.

In addition, the DfT have also provided guidance on the type of cameras to be used. Therefore, all sites will be enforced via the use of Automatic Number Plate Recognition (ANPR) cameras and will be Vehicle Certification Agency compliant. Any vehicles recorded to be contravening the proposed restrictions will be issued a PCN via post to the 'Registered Keeper' of the vehicle

3.44 An initial review of roads in Slough has identified twelve locations where better management through enforcement would be beneficial for safety and flow of traffic. The road safety team reviewed all the proposed sites where there have been complaints from residents, motorists and councillors over the years, these specifically with regard to school streets related to congestion or non-compliance with One-way signs. These locations were subject to consultation and will form part of the application submitted to the DfT on 7th July 2025.

Site	Location	Contravention
1	Windsor Road service road	No Entry
2	Stoke Road/ Stanley Cottages	Yellow box junction
3	High Street/Alpha Street North	No Entry
4	Tuns Lane junction	Yellow box junction
5	Park Street/High Street	No Entry
6	Dennis Way	School Street
7	Wexham school	School Street
8	Holy Family school	School Street
9	Langley Road/London Road	Yellow box junction
10	High Street, Langley/A4 London Road	Yellow box junction
11	Farnham Road/Sheffield Road	Yellow box junction
12	Farnham Road/ Buckingham Avenue	Yellow box junction

3.45 The list of locations is not exhaustive, but the initial review has identified roads or schools where there have been on-going safety problems or non-adherence to traffic signs and markings. The list above has been produced following correspondence with Thames Valley Police, officers and complaints/concerns raised by members and the public. Any future sites will need to meet the following criteria:

- Improve road safety
- Encourage active travel choices
- Tackle network congestion
- Increase public transport reliability
- Improve air quality
- Increase lifespan of highway assets i.e weight restrictions on roads and bridges.

3.46 To ensure fairness and in line with guidance, warning notices will be issued to all drivers committing a first offence within the first six months of the powers being implemented. Thereafter, a PCN will be issued to all drivers.

3.47 The PCN charge for offences through MTE is set to Level 2 as per the table below.

Band	PCN Charge	Payment within 14 days discount	PCN charge after 30 days
2	£70	£35	£105

3.48 Officers have visited Derby Council who were one of the first Councils to receive these powers. Derby have been working with the British Parking Association assisting Councils who are applying for powers. Open days have been arranged to understand the application process, how to evidence need and how to select sites.

3.49 For details of the results of the statutory public consultation regarding the proposed introduction of moving traffic offences, refer to Appendix E – MTE Consultation Summary.

3.50 Subject to approval from the DfT and as part of the implementation process, officers alongside the police will review all the road markings, signs and general layouts prior to preparing the Traffic Regulation Order consultations to ensure they are clear for all motorists.

- 3.51 Officers from the service and Communications will liaise with the Lead Member for Highways, Housing and Transport in advance of the enforcement start date to ensure the travelling public are aware. This will also include advance warning signs at each affected site.
- 3.52 The Cost of implementing MTE will be funded through the existing capital and revenue grant received from the DfT as part of the Integrated Transport and Highways block. This budget will cover the purchase and deployment of new ANPR cameras at the locations covered in the report. There are also a number of sites that will fall under the planned major transport schemes on the A4 and Farnham Road and the capital cost will be funded from these grants. It is intended to purchase a smaller number of mobile cameras for the remaining sites and rotate them at this stage as it is expected after time there will be compliance.
- 3.53 The DfT has set out that the income from MTE in some circumstances will not cover the operational costs and therefore only locations where non-compliance is evident, should there be camera enforcement. Any surplus generated over the operational costs must be invested back into the service such as covering the following areas:
- Public transport improvements
  - Maintaining the public highway
  - Improving active travel
- 3.54 A forecast of estimated operational costs covering cameras, IT equipment and contractor staff is listed below. Officers have visited a number of local authorities who are currently using the MTE powers and have proposed due to the six month “grace” period it is more cost effective to deploy mobile cameras before deciding on fixed cameras. The range in camera cost varies from £9k for a mobile camera to £40k for a fixed camera.
- 3.55 To facilitate the enforcement of Moving Traffic Enforcement (MTE), the Council’s contractor will be required to procure the MTE-specific IT module. This module is an add-on to the existing parking IT system and is essential for the effective processing and management of MTE cases. The estimated cost of the module is £10,000 and will be met from within existing service budgets. In addition to the IT requirements, there may be a need to recruit two Full-Time Equivalent (FTE) posts: one position within the contractor’s team to review new footage, and one Council officer to manage representations and appeals. The requirement for these posts will become clearer once enforcement has commenced and the six-month grace period has concluded. Should the need for these roles be confirmed, funding will be drawn from Penalty Charge Notice (PCN) income.
- 3.56 Experience from other local authorities that have implemented similar powers indicates a high level of compliance following the issuance of initial warning notices. Should the service demonstrate the need for additional staffing resources, the Council will consider recruiting on a fixed-term basis, with decisions informed by PCN volumes and the outcomes of the grace period.
- 3.57 Year one shows an estimated £45,000 operational cost, this includes variable costs to the council from the contract for processing payment of PCNs and banking charges. It is unknown yet how many live PCNs will be issued due to the 6-month grace period. In year two (26/27) there may be camera maintenance charges to

consider showing an increased cost however the grace period will be over and this will increase PCN issue rates. This will be monitored closely with finance.

	<b>2025/6</b> 3,000 PCNs	<b>2026/7</b> 7,000 PCNs	<b>2027/8</b> 7,000 PCNs
<b>Software</b>	£24,500	£4,000	£4,000
<b>Banking Charges</b> (£0.44 per PCN)	£5,280	£8,800	£8,800
<b>Processing Charges</b> (£1.62 per PCN)	£19,440	£32,400	£32,400
<b>CCTV Review Officer</b>	n/a	£30,000	£30,000
<b>Total</b>	<b>£45,100</b>	<b>£75,200</b>	<b>£75,200</b>
<b>MTE Income Estimate</b>	<b>£63,000</b>	<b>£147,000</b>	<b>£147,000</b>

3.58 The forecast is approximate as this type of enforcement has not been undertaken in the borough before. Officers have been in contact with neighbouring authorities who submitted applications to the DfT in the first and second phase. The general view from these authorities and the authorities in the midlands that officers visited, was to reduce the operational costs by using mobile cameras as the level of compliance achieved will determine the ongoing level of revenue.

## 4. Implications of the Recommendation

### 4.2 Financial Implications:

4.2.1 It is proposed that Cabinet agrees to the variation of Saba's Parking contract to include the recruitment of 20 new civil enforcement officers (CEO), as highway restrictions across the borough requiring enforcement has grown significantly since the original contract, undertaking the persistent evader vehicle removal and storage service, to deal with vehicles with multiple unpaid parking tickets, and the management of the Moving Traffic Enforcement (MTE) to improve air quality and traffic flow. The additional contract costs are set out below

#### **Additional contract costs**

<b>Service Description</b>	<b>2025/26</b> £m	<b>2026/27</b> £m	<b>2027/28</b> £m
Additional Civil Enforcement Officers (CEO)	£0.640	£1.210	£1.210
Persistent evader vehicle removals & storage	£0.011	£0.001	£0.000
Moving Traffic Enforcement (MTE)	£0.045	£0.075	£0.075
<b>Total Expenditure</b>	<b>£0.696</b>	<b>£1.286</b>	<b>£1.285</b>
Annual change to contract value	£0.696	£0.590	

4.2.2 The current contract value is expected to increase by £0.696m in 2025/26 reflecting part year increase while the subsequent years will reflect full year increase. As a result, additional expenditure budget requirement for the contract will include the new services as above of £0.696m plus existing budget pressure of £0.555m, a total of £1.251m in 2025/26.

4.2.3 The additional 20 CEOs and MTE powers is estimated to generate additional PCN income as set out below

## Additional Income

Service Description	2025/26	2026/27	2027/28
	£m	£m	£m
Additional Civil Enforcement Officers (CEO)	£0.737	£1.474	£1.474
Moving Traffic Enforcement (MTE)	£0.013	£0.097	0.097
<b>Total Income</b>	<b>£0.750</b>	<b>£1.571</b>	<b>£1.571</b>
Additional annual Income	£0.750	£0.821	

The proposed contract variations value is expected to generate additional PCN income of £0.750m in 2025/26 reflecting part year increase while the subsequent years will reflect full year income. As a result, annual additional income budget requirement for the contract variation is estimated to be £0.750m in 2025/26 and £0.821m in 2026/27.

4.2.4 In addition, it is proposed that cabinet agree to reduce the cost of the first resident permit fee from £75 to £50 per year and allow up to three parking permits for each household as standard. This will benefit large families with multiple cars and help traffic flow. The fee reduction will apply to existing and future resident permit schemes. The proposal as it stands is estimated to lose income of £0.030m annually on the 1st permit and will cost an additional £0.004m to implement resulting in a total scheme budget pressure of £0.034m. It is however anticipated that a potential but unquantified increase in demand for 2<sup>nd</sup> and 3<sup>rd</sup> permits may well generate more income to fully mitigate the total pressure.

4.2.5 The budget requirements resulting from the new services and current budget pressure is set out below

### Budget Implication

Service Description	2025/26			2026/27			2027/28		
	£m	£m	£m	£m	£m	£m	£m	£m	£m
	<b>Costs</b>	<b>Income</b>	<b>variance</b>	<b>Costs</b>	<b>Income</b>	<b>variance</b>	<b>Costs</b>	<b>Income</b>	<b>variance</b>
Current Contract budget pressure	£0.555	0	£0.555						
Additional Civil Enforcement Officers	£0.640	£0.737	-£0.097	£1.210	£1.474	-£0.264	£1.210	£1.474	-£0.264
Persistent evader vehicle removals &	£0.011	£0.000	£0.011	£0.001	£0.000	£0.001	£0.001	£0.000	£0.001
Moving Traffic Enforcement (MTE)	£0.045	£0.013	£0.032	£0.075	£0.097	-£0.022	£0.075	£0.097	-£0.022
Resident Permit schemes	£0.034	£0.034	£0.000	£0.000	£0.000	£0.000	£0.000	£0.000	£0.000
<b>Net Budget requirement</b>	<b>£1.285</b>	<b>£0.784</b>	<b>£0.501</b>	<b>£1.286</b>	<b>£1.571</b>	<b>-£0.285</b>	<b>£1.286</b>	<b>£1.571</b>	<b>-£0.285</b>
<b>Annual Budget requirement</b>	<b>£1.285</b>	<b>£0.784</b>	<b>£0.501</b>	<b>£0.556</b>	<b>£0.787</b>	<b>-£0.231</b>			

All four proposals plus the current contract budget pressure would require a total additional gross expenditure budgets of £1.285m in 2025/26 and £0.556m in 2026/27, and a gross income budgets £0.784m in 2025/26 and £0.787m in 2026/27 or a net budget of £0.501m in 2025/26 and (£0.231m) in 2026/27. The budget gap is to be mitigated as follows:

	2025/26	2026/27	2027/28
	£m	£m	£m
Budget gap	£0.501	£0.501	£0.270
In year service savings	-£0.501	-£0.270	-£0.270
Excess Income budget virement		-£0.231	0
<b>Adjusted budget requirement</b>	<b>£0.000</b>	<b>£0.000</b>	<b>£0.000</b>

4.2.6 Failure to generate sufficient income to offset the additional costs will require the Executive Director for Regeneration, Housing and Environment to identify alternative mitigating savings from within the Directorate. It is therefore vital for robust and timely monitoring and forecasting of the income position, so that those decisions can be taken in time for the appropriate mitigations to be managed.

## 5. Legal implications

- 5.1 Section 16(1) of the Traffic Management Act 2024 (“TMA 2024”) states that: “It is the duty of a local traffic authority to manage their road network with a view to achieving, so far as may be reasonably practicable having regard to their other obligations, policies and objectives, the following objectives: securing the expeditious movement of traffic on the authority’s road network; and, facilitating the expeditious movement of traffic on road networks for which another authority is the traffic authority.”
- 5.2 If the application to the Secretary of State for designation as a civil enforcement area for moving traffic enforcement is approved, the moving traffic enforcement powers granted will play a role in helping the Council meet its network management duty by enabling improved enforcement with consequential benefits to road safety, congestion and air quality.
- 5.3 The Council must have regard to the statutory guidance for civil enforcement of bus lane and moving traffic contraventions issued by the Secretary of State for Transport on 21 October 2022 when developing, implementing and reviewing its moving traffic enforcement regime. The Secretary of State may refuse to approve the application if the guidance is not followed.
- 5.4 Part 6 of the TMA Section 73 contains offences which may be regarded as parking contraventions and subject to civil enforcement.
- 5.5 The Council can charge for residents' parking permits under powers granted by the Road Traffic Regulation Act 1984 which allows local authorities to designate parking places, issue permits, and set charges for their use.
- 5.6 The Council must comply with its Constitution, Contract Procedure Rules, and as this contractual arrangement falls within the relevant procurement threshold for ‘services’, the council must also comply with the *Public Contract Regulations 2015 (PCRs 2015)*.
- 5.7 The Council is seeking to rely on Regulation 72 of the *PCRs 2015* in relation to the proposed extension and variations to the contract.

5.8 Part 4 of the Council’s Constitution (4.6.1 - Contract Procedure Rules), Table 1 ‘ Authorisation and Acceptance Thresholds’ expects that for arrangements of the proposed value outlined in this report, Cabinet approval will be required.

5.9 The Council shall ensure that HB Public Law is instructed to provide legal advice and support, should the recommendations outlined in this report, be approved.

**6.0 Risk management implications**

6.1 Enforcement has been in place for more than 20 years however this proposed increase in enforcement will lead to a change within our neighbourhoods.

<b>Description of risk</b>	<b>Risk/Threats/Opportunities</b>	<b>Current Controls</b>	<b>Proposed future controls</b>
Current supplier cannot meet the requirements of the service	Low Unlikely as experienced parking contractor in place.	Contract in place with strong KPIs	LOW
Costs exceed estimated financial envelope	Low	Review contract costs prior to employing additional staff	MEDUIM
PCNs generated are not as originally forecasted	Medium	Limit exposure by ensuring additional staff are on fixed term contracts.	LOW

**6.4 Environmental implications**

6.4.1 It is expected that with compliance; the streets of Slough will be better maintained with regard to highway maintenance and street cleaning. General cleanliness in neighbourhoods will result in reduced costs for the council but also provide a sense of pride to those living in areas that are blighted by inconsiderate parking.

6.4.2 An improvement to enforcement at key locations will also contribute to those travelling by public transport and will in turn improve bus journey times and minimise the risk of service changes due to delays.

**6.5 Equality implications**

6.5.1 An equalities impact assessment has been undertaken for each of the increase in CEOs and MTE proposals and are attached at appendixes B and C. An EIA has already been completed for the Vehicle Removals proposal which was approved at Cabinet in December 2024. From the assessments there are no negative impacts on protected groups. Positive impacts are expected in terms of reducing congestion, improving road safety and providing safer neighbourhoods.

## 6.6 *Procurement implications*

- 6.6.1 The enforcement contract in place with Saba was let in 2018 and is a ten-year contract including five potential one-year extensions. This will expire to 2028. The service has stated that it will be extending the contract and modifying it. The total value of the contract at the point it was let, before adding the inflation increases allowed under the contract was £16m. The proposal here is for a modification valued at £3,059,622. This is to fund additional civil enforcement officers and expand the service into other areas, such as bus lanes and vehicle removal.
- 6.6.2 The Council's Contract Procedure Rules under which this contract was let (Rule 13.3.2) states that modifications can be made to the a contract when "new services, supplies and services need to be purchased from the supplier, and a change of supplier cannot be realistically made, for economical or technical reasons and would cause significant inconvenience or substantial duplication of the Council's costs. This is subject to the provision that each change does not increase the contract value by more than 50% as a result".
- 6.6.3 The service has advised that these criteria have been met and that the total value of all modifications made, and anticipated, will relate to the work set out in the original contract, and will not exceed 50% of the original value when adjusted for inflation.

## 6.7 *Workforce implications*

- 6.7.1 There are no workforce implications to the contractor. Staff employed will be taken on as per a contract variation and the incremental deployment will be managed.
- 6.7.2 Due to the potential increase in Councils appeals process, it is proposed to increase the number of appeals officers by two posts. This will be an 18-month fixed term post allowing time for the service to determine if the workload is still likely to be high.

## 6.8 *Property implications*

- 6.8.1 There are no property implications.

## 7.0 **Background Papers**

None