



The Civil Enforcement of Parking in Worcester City.

Part [6] The Traffic Management Act 2004.

General Guidance for the Civil Enforcement of Parking both On-Street [Highways] and Off-street [car parks] in Worcester City & the cancellation of Penalty Charge Notices.

Parking & Enforcement Services May 2017.

Information set out in the following document is intended to act as advice only. Each Case is considered on it's individual merits and circumstances, taking into account all of the known facts and all of the evidence available.

INTRODUCTION:

Worcester City Council presents the following guidance in respect of Decriminalised Parking Enforcement in Worcester City. This is consistent with best practice and aims to provide clarity, consistency and transparency within the enforcement process and compliance with the **Traffic Penalty Tribunal** [TPT] and the **Local Government Ombudsman**. [LGO].

Worcester City Council enforces on-street parking restrictions by way of a formal agency agreement with Worcestershire County Council, [The Highways Authority]. It also carries out parking enforcement within all of Worcester City Council's car parks, both surface and multi-storey.

These protocols provide a basis on which fairness and discretion may be applied by Worcester City Council when issuing Penalty Charge Notices to vehicles parked unlawfully and when dealing with any subsequent informal appeal by a driver or person who has received the Penalty Charge Notice [PCN].

It is recognised by both the Traffic Penalty Tribunal as well as the Courts that an enforcing authority must not fetter its discretion but must consider each informal appeal on its own individual merits and circumstances that prevailed at the time of issue of the PCN.

Worcester City Council in considering any informal appeal must apply a reasonable approach with objectivity and fairness the guiding principles at all times.

Discounted Period:

You may pay the Penalty Charge in full within **14 days**, if you do so the level of the Penalty Charge will be discounted by **50%**.

£70 discounted to **£35**, or **£50** discounted to **£25** [depending on the particular parking contravention involved].

CHALLENGING THE ISSUE OF A PENALTY CHARGE NOTICE:

There are two distinct parts to the informal challenge process; a motorist who receives a Penalty Charge Notice has a right of appeal.

In the first instance that right of appeal is at an informal stage to the issuing authority [Worcester City Council]. **All appeals must be in writing** [e-mails are accepted] or via the on-line portal at www.worcester.gov.uk this is known as the '**Informal Appeal**'.

The Appeals & Payments team at Worcester City Council will consider challenges and representations in accordance with the following guidance. Contrary to

popular myth, Civil Enforcement Officers do not work to meeting set targets for the numbers of PCNs they issue, where they are issued or to which vehicles they are issued. To do so is unlawful [Traffic Wardens and Parking Attendants Act 2005 [Section 3].].

Neither may Council Managers set targets or quotas, this is also unlawful.

There is a requirement for staff to respond to challenges and representations in a timely manner and to do so courteously and with clarity.

If your written challenge is deemed to be invalid you will be advised in writing that your informal appeal has been unsuccessful and with detail to explain the reasons why. If supporting evidence has been used to reach this decision then you will be advised that this was the case. An additional period of 14 days from the date of reply will be given during which the motorist can still pay at the **discounted rate**.

If the challenge is deemed to be valid you will be advised in writing that the **PCN has been cancelled** the reasons why.

If you disagree with the first decision in respect of your informal appeal and you write a further letter of objection, your case is considered by another different officer, provided though that you have supplied either **new evidence** or made **additional points** or **not all of the points** were considered in your initial appeal.

If you simply reiterate that which you have written before then you will be advised to wait to receive the Notice To Owner. You will be given a final additional period of 14 days from the date of reply during which you can pay at the discounted rate. You will however, be advised that if a Notice To Owner is issued the amount due will revert back to the full charge [i.e. £25 back to £50 or £35 back to £70].

GENERAL REASONS:

Below is a sample list of reasons that some motorists offer as a reason to cancel the PCN issued to them, **appeals based on the following grounds will not be considered as appropriate for cancellation of the PCN.**

INAPPROPRIATE CANCELLATION REASONS/CLAIMS:

Whilst statutory requirements are clear that challenges must be considered based on guidance contained in this information, a fundamental requirement is to consider each appeal on it's individual merits taking into account all of the evidence available.

The following examples will require exceptional circumstances to have been in place at the time of issue of the PCN if a cancellation is to be considered as a result.

- I thought I was parked legally but made a genuine mistake.
- There was nowhere else to park.
- This is the first time I have ever had a parking ticket/ I will not do it again / I will be more careful next time.
- I only stopped for a minute.
- There was no need for a yellow line at that location.
- I did not see the signs or lines.
- I was parked outside my own house/property.
- I went to get change for the Pay & Display machine and it took a long time.
- I got lost and so could not return in time to my vehicle.
- Other vehicles were also parked illegally and I did not see them get a ticket.
- I was doing work at the property and there was nowhere else to park.
- I lent the car to a friend and they will not pay the PCN!!
- I was delayed at an important meeting.

Below are the grounds on which you may wish to base you informal appeal on.
Please note that this list is not an exhaustive one. It is important to note however, that this is not a guarantee of achieving a cancellation of your PCN

1. Informal Appeal Reason	The Vehicle was not in the location described in the parking contravention.
May be cancelled if.	Details of the vehicle excise licence are supplied.
2. Informal Appeal Reason.	I was not aware parking restrictions applied at that location.
May be cancelled if.	The signs and/or lines did not indicate the parking restriction[s] for which the PCN was issued. [OR] Signing and/or lining were not that which lawfully permits the issue of a PCN.
3. Informal Appeal Reason.	The vehicle Had Broken Down or immobilised following a collision/incident.
May be cancelled if.	Due to vehicle breakdown it either could not be moved from the parking place where restrictions apply or it had to be left when it was broken down to await recovery/removal. Documentary evidence supplied to support this claim, such as recovery note etc.
4. Informal	Passenger or driver was taken ill or some other emergency

Appeal Reason.	circumstances were involved which was beyond the control of the driver and prevented the vehicle from being removed.
May be cancelled if.	Documentary evidence supplied to support this claim such as Doctors appointment/note or Hospital admittance note etc.
5. Informal Appeal Reason.	Unmarked vehicle being used by the Emergency Services.
May be cancelled if.	Unmarked vehicle or marked vehicles being used for an Emergency service purpose – evidence supplied to support this claim such as operational log or supervisor confirmation.
6. Informal Appeal Reason.	The vehicle was stolen at the time.
May be cancelled if.	Documentary Evidence supplied such as a Police Crime report number or insurance claim number.
7. Informal Appeal Reason.	I over stayed the time permitted at that parking place.
May be cancelled if.	In order for an informal appeal to be allowed there must be mitigating circumstances which could not have been foreseen at the time of parking. Documentary evidence to support such a claim to be provided.
8. Informal Appeal Reason.	Loading or un-loading was Taking Place.
May be cancelled if.	<p>To qualify for loading or un-loading the activity involved must meet the following criteria; -</p> <ul style="list-style-type: none"> • It Must be continuous. <ul style="list-style-type: none"> • The motorist should not stop the activity unnecessarily, for example to have a cup of tea or chat etc. However, this does not mean that activities such as completing paperwork [delivery notes etc.] or locating goods within premises being visited is not part of the loading or un-loading process. • The removal or delivery of the goods involved must require the presence of the motor vehicle. • The goods being loaded or un-loaded must be of such weight or bulk that they cannot reasonable be carried other than by means of a motor vehicle. The goods must be of a type that cannot easily be carried by one person in one trip. However, in some circumstances

	<p>goods may be several items that are individually lightweight when delivered in the course of a trade or business. In these instances, delivery and collection will be considered in the same manner as loading or un-loading.</p> <ul style="list-style-type: none"> • Timely. • The activity should be completed without undue delay. • The Civil Enforcement Officers are trained to place vehicles under observations on yellow lines for a period of not less than five minutes in order to establish beyond reasonable doubt whether any loading or un-loading is taking place either to or from the vehicle. If no such activity is witnessed during this period a Penalty Charge Notice may be issued. • There are certain places where loading or un-loading is not permitted. In such cases signs and kerb markings will be in place to indicate this. Details of such signs may be found in the Highway Code publications Page 116 refers.
9. Informal Appeal Reason.	I stopped to drop off or pick up passengers.
May be cancelled if.	See Page 115 current version of Highway Code. To qualify for this exemption the driver must stay with the vehicle. If they have left the vehicle for whatever reason then they cannot claim this exemption.
10. Informal Appeal Reason.	The Vehicle Was Being Used By A Utility Company.
May be cancelled if.	<ul style="list-style-type: none"> • Vehicles relating to the usual providers of Gas, Water, Electricity or telephony may be exempt and these vehicles will usually be marked with the relevant company logos/signs. Exemptions sit within most Traffic Regulation Orders for such suppliers to carry their necessary works. • If a PCN is issued, then detailed information will be required for cancellation of works being undertaken submitted on headed paper or via E-mail. • The vehicle must be parked within a reasonable distance of visible works, which could reasonable be connected with the works and those works must be on going and active.

	<ul style="list-style-type: none"> For clarification case law qualifies the application of this exemption to work which is being undertaken within the confines of the highway. Works that are being carried out within a building is not covered by this exemption and the vehicle must park lawfully elsewhere or via a formal Parking Dispensation [one or seven day].
11. Informal Appeal Reason.	Working on a Property and needed access to the vehicle at all times.
May be cancelled if.	<ul style="list-style-type: none"> This will apply as an example, to those vehicles used by persons in the building trade or contractor's to public utilities. These vehicles have no automatic exemption and have to comply with parking regulations. A temporary one or seven day Parking Dispensation may be granted if the driver seeks the consent of the Parking Office or Enforcement Team on the day they wish to park or in advance. If a PCN is issued then reference may be made to the unique number of the Parking Dispensation issued. <ul style="list-style-type: none"> For dispensation telephone 01905 722233.
12, Informal Appeal Reason.	Entitled To Park In Blue Badge Disabled Persons Bay.
May be cancelled if.	<p>If this is the first time that a PCN has been issued to the vehicle and the motorist supplies copies of both sides of the blue badge that would entitled their parking at that location and the badge is in date and valid, then the PCN may be cancelled.</p> <p>It is the badge holder's responsibility to ensure that the Blue badge is displayed correctly at all times when parked in a Disabled Persons parking space or bay.</p>
13. Informal Appeal Reason.	Entitled To Park In resident`s Space or Bay.
May Be Cancelled if.	<p>Resident's Vehicle Parking Permit: If the PCN has been issued to a vehicle that has previously qualified to hold a resident's parking permit and the motorist supplies details to confirm that the permit is valid then the PCN may be cancelled.</p> <p>It is the permit holder`s responsibility to ensure that the permit is correctly displayed.</p>

	<p>Visitor Scratch Permits: In order for the PCN to be cancelled the following must apply; -</p> <ul style="list-style-type: none"> • There must be photographic evidence to link the permit on display to the one provided in evidence. <p>The PCN will not be cancelled if the following applies; -</p> <ul style="list-style-type: none"> • It was not on display at the time that the PCN was issued.
14. Informal Appeal Reason.	Parked in an 'On-Street bay' other than for that class of vehicle.
May be cancelled if.	<p>There are three types of parking bays where parking is restricted to specific users, being; -</p> <p>1. Blue Badge Disabled Persons Parking Bays: These bays are solely for the use by holders of a Blue badge [disabled persons] and no other vehicles not displaying such a badge may park there. A PCN issued to a vehicle where the motorist is unable to provide evidence of holding a valid blue badge will be upheld and not cancelled.</p> <p>2. Goods Vehicle Only Loading Bays: In order to park in these spaces a vehicle must be classified as a Goods Vehicle [that is a mechanically propelled vehicle constructed or adapted for the carriage of goods or burden being intended or adapted for use on a road]. No other non-goods vehicles are permitted to park in these bays, even for loading or un-loading.</p> <p>Note: Motorists may claim that their vehicle qualifies as a Goods vehicle due to it being taxed under the vehicles excise scheme as private/light goods or is insured for business purposes. This may be the case but if the vehicle is not actually a Goods vehicle [see previous definition] it cannot park there/</p> <p>Section 58 of The Goods Vehicles [Licensing of Operators] Act 1995 defines a goods vehicle as a motor vehicle which is 'Any adaptation must be substantial and permanent.</p> <p>An estate car with the rear seats folded down is not classed as a Goods vehicle as this is not a significant or permanent adaptation and the principal use of the vehicle is for the conveyance of persons.</p> <p>3. Taxi Bays: Only licensed Hackney Carriages [Taxis] plying for hire are permitted to park in these</p>

	bays. Unless the motorist can provide evidence to support that the vehicle qualifies under this requirement, the PCN will be upheld and the appeal dismissed.
15. Informal Appeal Reason.	Parked in a Bus Stop.
May Be Cancelled if.	Only buses are permitted to park in and use designated bus stops or lay-overs and a PCN issued to any other vehicle not being a 'bus' will be upheld and the appeal dismissed.
16. Informal Appeal Reason.	Re-Parked in the Same Bay Within The Time Restricted Period [i.e. no return within 2 hours].
May be cancelled if.	<p>Many on-street parking bays have a maximum time limit during which the vehicle can remain parked together with a period during which the vehicle having left the parking space may not return and park again.</p> <p>It is unlikely that there will a valid and qualifying reason to cancel a PCN in relation to this contravention of return within the restricted time period.</p>
17. Informal Appeal Reason.	Overstayed The Parking Time Purchased.
May be cancelled if.	<p>In order for an appeal to be considered, there must be mitigating circumstances that either could not be foreseen at the time of parking or that arose after parking commenced.</p> <p>Documentary evidence to support any such appeal would be expected in order to challenge the issue of the PCN.</p>
18. Informal Appeal Reason.	Parked In A Car Park Bay Not Designated For That Class/type Of Vehicle.
May be cancelled if.	<p>If the vehicle is parked in a permit or reserved space parking bay and the motorist cannot produce a valid permit the PCN will be upheld and the appeal dismissed.</p> <p>If a vehicle is parked in a disabled persons blue badge parking space and the driver cannot produce valid disabled persons blue badge the PCN will be upheld and the appeal dismissed.</p> <p>If this is the first time that a PCN has been issued to the vehicles and the motorist has supplied copies of both sides of their disabled persons blue badge to confirm it`s validity, then the PCN may be cancelled.</p>
19. Informal Appeal Reason.	Could Not Or Did Not Park Within The Marked Out Bay.

<p>May be cancelled if.</p>	<p>Motorists who park in all Worcester City Council car parks are expected to park within the clearly marked out bays. Vehicles should park wholly within the bay.</p> <p>Parking out of a bay due to another vehicle parking incorrectly or inconsiderately is not a valid reason for you to do so. If this is the case the driver should park elsewhere where they can park within a bay.</p> <p>Worcester City Council will only issue a PCN to a vehicle parked 'out-of-bay' where the vehicle intrudes into another bay and prevents that other bay from being used.</p>
<p>20. Informal Appeal Reason.</p>	<p>No Valid Pay & Display Ticket Seen on Windscreen or Did Not/Could Not Purchase a Pay & Display Ticket.</p>
<p>May be cancelled if.</p>	<p>All Worcester City Council car parks are Pay & Display and there are ample signs in every car park that indicates this is the case. It is unlikely that an informal appeal will be allowed on the basis that a driver was unaware that there was a requirement to Pay to Park either by purchasing a Pay & Display ticker or paying via the cashless parking system known as 'RingGo'.</p> <p>If the motorist claims that the Pay & Display machine was not working, the PCN may be cancelled provided that the machine has been reported as having a fault or not operating correctly on that day, [or immediately before that day], prior to the issue of the PCN.</p> <p>If a car park has more than Pay & Display machine there is a reasonable expectation that the driver buys the Pay & Display ticket from another machine that is working.</p> <p>Motorists are expected to confirm that the Pay & Display ticket they have purchased and removed from the machine to display in their vehicle shows the correct details including the time and the vehicle registration numbers. It is their responsibility to enter the correct details into the Pay and Display machine when confirming registration numbers.</p> <p>Motorists must also ensure that they have paid for the correct amount of time and that all coins inserted into the machine have been registered.</p> <p>If a motorists receives a PCN and claims they had left the Pay & Display machine to obtain change / coins it is unlikely that the informal appeal will be cancelled.</p> <p>The Pay & Display ticket must be clearly displayed in the front windscreen of the vehicle in order that it may be viewed from outside of the vehicle by a patrolling Civil</p>

	<p>Enforcement Officer of Worcester City Council or any other authorised office of the Council.</p> <p>If this is the first time that a PCN has been issued to the vehicle for failing to display a valid Pay & Display ticket and the patrolling CEO confirm that was a Pay & Display ticket within the vehicle that could not be readily inspected [i.e. turned over or fallen onto the seat/floor etc.] and the driver produces a Pay & Display ticket that covered the date and time in question for the vehicle concerned, then the informal appeal may be allowed, on this first occasion only.</p> <p>If a vehicle receives a PCN in similar circumstance's to that above but produces a valid Season Parking Permit and this is the first time this has happened involving that vehicle, then the informal appeal may be allowed. [as season tickets are now managed in the virtual platform it is possible that the patrolling CEO due to network issues for example was not able to inspect or confirm the presence of the season ticket on the Chipside 'MiPermit' system.</p> <p>The same will apply to circumstances where a driver has paid for their parking using the cashless parking system known as 'RingGo'. The same criteria will apply, being this is the first occasion and the driver produces evidence to support their purchase of the parking times via RingGo for example a 'screen-dump'.</p>
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STAGE TWO: FORMAL APPEAL [REPRESENTATIONS].

If you wish to make a formal appeal, after Worcester City Council has rejected your informal appeal, then you may do so to the Independent Adjudicator. You are unable to do this until you have received the **Notice To Owner [NTO]** form that is issued to the registered keeper of the vehicle.

STATUTORY GROUNDS ON WHICH TO MAKE FORMAL REPRESENTATIONS.

Part 6. The Traffic Management Act 2004.

1: General Information.

- 1:2 If the **Penalty Charge Notice [PCN]** is not paid after the **14** day discount period has expired; the balance will revert to the full charge. After **28** days, if the PCN remains unpaid, Worcester City Council will request keeper details from the **DVLA** for the keeper at the time of the

contravention occurring. A **Notice To Owner** [NTO] will then be issued to the person or company named by the DVLA as the registered keeper/owner.

- The Notice To Owner [NTO] will be issued if; -
- No payment has been received.
- The payment made was insufficient to clear the Penalty Charge, e.g. the charge was paid after the expiry of the 14 day discount period.

The NTO will be issued by **first class post** and will be taken to have been served on the **second working day after** the date of posting. The rules relating to service may be found in Regulation 3 of The Civil Enforcement Of Parking Contraventions [England] General Regulations 2007.

The NTO will provide full details of the parking contravention, the amount payable and the options available to the recipient are; -

- ***Pay the full amount outstanding as shown in the Notice To Owner***
[or]
- ***Make representations under one of the grounds listed on the Notice to Owner.***

Formal representations must be made to Worcester City Council within **28** days beginning with the **date that the Notice to Owner was served**.

Representations must be made using the form supplied as this ensures that all of the requisite information is provided. However, they can be made by letter or e-mail but the ground[s] under which the representation is made must be stated. Supporting information should be supplied where necessary and appropriate. E.g. proof of sale of the vehicle.

Once a representation has been received, Worcester City Council must reply formally in writing within **56** days beginning with the date on which the representation was received by the Council. If further information is required in order to deal with and consider the representation then the **56** days will start from the date that information was received. Worcester City Council aims to respond to and acknowledge all representations within **30** days.

If the representations are rejected, the registered keeper/owner will receive a Notice of Rejection and then has the right of appeal against that decision to the Independent Adjudicator. An appeal form will be included with the Notice of Rejection and explains what to do next.

There are no circumstances where an appeal can lawfully be made without a Notice of Rejection being issued relating to representations against the Notice To Owner.

The statutory grounds on which representations may be made are explained in more detail in the following section. Full details of the reasons for the representations and why the Penalty Charge Notice should be reconsidered must be provided.

2: BURDEN OF PROOF:

2:1 In all proceedings relating to the Enforcement of Civil Parking Enforcement in England the burden of necessary at Civil Law in order to establish the facts and whether or not a Parking Contravention occurred is known as '**On the balance of probabilities**'. This burden of proof must be followed at all times by enforcing authorities and Independent Adjudicators.

3: STATUTORY GROUNDS:

3:1 'The alleged contravention did not occur.'

You will need to provide as much evidence as possible to support your view that the PCN should not have been issued. If you are relying on the evidence of a Pay & Display ticket, a permit or a disabled persons/ blue badge as your evidence, you must supply legible copies with your representation.

3:2 If you tick the relevant box but then do not provide any evidence you will be invited to do so. If you do not, your representations are likely to be rejected.

4: 'I was not the owner of the vehicle in question.'

4:1 Whilst it is unlikely that any information can be provided to support this statement, if any is available, it should be included with the representation. However, the Notice To Owner is sent to the registered keeper of the vehicle at the time of the contravention as supplied by either the DVLA, a hire/lease company or a motor trader and documentary evidence of this will be held by the Council.

5: 'I had ceased to be the owner of the vehicle before the date on which the alleged parking contravention occurred'.

5:1 You need to provide proof that the vehicle was disposed of before the contravention, such as a bill of sale, vehicle registration documents, vehicle insurance documents or letters from the DVLA. You also need to provide the name and address [if known] of the person or company to

which the vehicle was sold. If documentary evidence is not received, **your representations will be rejected.**

6: 'I became the vehicle's owner after the date on which the alleged contravention occurred.'

6:1 You will need to provide proof that the vehicle was purchased after the contravention, i.e. a Bill of sale, registration documents, insurance documents or a letter from the DVLA. You will also need to provide the name and address of the person/company to who you sold the vehicle. If documentary or other supporting information is not received your informal appeal / representations will be rejected.

7: The vehicle had been permitted to remain at rest in the place in question by a person who was in control of the vehicle without the consent of the owner.

7:1 If the vehicle had been stolen or taken without the owner's consent, then you will need to provide a Police Crime reference number when you reported it's loss to the Police.

7:2 If the vehicle was being driven by a third party and not actually reported as stolen to the Police then the registered keeper is always liable for the Penalty Charge Notice payment and your representations will be rejected.

8: We are a vehicle hire/leasing firm and the vehicle was on hire/lease under a hiring/lease agreement and the hirer/person leasing the vehicle has signed a statement acknowledging liability for any Penalty Charge Notice issued to the vehicle during that hiring period.

8:1 You must supply a copy of the hiring or leasing agreement which must contain certain prescribed information.

8:2 If the vehicle is a courtesy car supplied to a customer then unless they have a signed agreement that contains the same prescribed details as required by a hiring agreement then the registered keeper will remain liable for payment of the Penalty Charge Notice.

9: The Penalty Charge Exceeded the amount applicable in the circumstances of the case.

9:1 If you think that you are required to pay more than is required by law, you need to explain in detail why. If you tick the box, but do not provide a supporting explanation you will be asked to do so. If you do not, your informal appeal/representations will be rejected.

10: There has been a procedural impropriety by the enforcement authority [Worcester City Council].

10:1 A representation may only be made on these grounds if you believe that Worcester City Council has failed to comply with any requirements imposed by the Traffic Management Act 2004, The Civil Enforcement Of Parking Regulations [England], the Representations and Appeals Regulations 2007 or the Civil Enforcement of Parking Contraventions[England] General Regulations 2007.

10:2 When making your representation you have to set out the statutory requirement, time limit or other procedural step with which you believe the Council has failed to comply with.

10:3 If you tick the box but do not provide any supporting information you will be asked to do so. If you do not, your informal appeal/representation will be rejected.

11: The Order which is alleged to have been contravened is invalid.

11:1 You must explain why you believe the Order in question is invalid. This means the Traffic Regulation Order [TRO] made by the Highways Authority [Worcestershire County Council] for the location where the contravention occurred.

11:3 If you tick the box but do not provide this information you will be asked to do so. If not, your informal appeal/representation will be rejected.

12: This Notice should not be served because the penalty charge has already been paid.

12:1 [i] In full; - [or]

[ii] At the discounted rate set in accordance with Schedule 9 to the Traffic Management Act 2004 and within the time specified in paragraph 1[h] of the Schedule to the Civil Enforcement of Parking Contraventions[England] General Regulations 2007.

You will need to confirm the amount of payment already made, when and how it was paid and include any supporting documentary evidence such as a receipt or bank statement. If you are unable to supply a bank statement you will need to provide the date that the payment cleared your account.

The discounted rate was 50% of the Penalty Charge and should have been paid not later than the last day of the period of 14 days beginning with the date on which the PCN was served, i.e. the date of the parking contravention. If a challenge to the PCN was made and rejected, then the 14 day discount period started from the date on the rejection letter.

If you believe that you paid the discounted amount within the 14 days of either the date of the parking contravention or the date on the rejection letter, then you will need to provide evidence to support this.

13: Other Grounds [non statutory].

13:1 Worcester City Council will always give consideration to all representations received, whether or not they fall within one of the eight statutory grounds for cancellation.

**Worcester City Council Parking & Enforcement Services.
May 2017.**

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