

Road User Charging Adjudicators'

Annual report 2018-19



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ULEZ in London



Contents (click on title to view)**Page**

1. <u>Aims and objectives of the Road User Charging Adjudicators</u>	4
2. <u>The role of the Road User Charging Adjudicators</u>	4
3. <u>Statement of requirements</u>	5
4. <u>Chief Adjudicator's foreword</u>	8
5. <u>Adjudicators who currently hear appeals</u>	9
6. <u>Ultra Low Emission Zone</u>	10
7. <u>Unauthorised web sites</u>	13
8. <u>The work of the Duty Adjudicator</u>	13
9. <u>Recent cases in the tribunal</u>	15
10. <u>Useful information</u>	29
- <u>Structure of the Road User Charging Adjudicator Tribunal</u>	29
- <u>The appeal process</u>	30
- <u>Grounds of appeal</u>	31
- <u>London Tribunals' website</u>	32
- <u>Statutory register</u>	33
- <u>Previous annual reports</u>	34
 Appendix 1: <u>Appeals 2003-2019</u>	35
Appendix 2: <u>Appeal decisions (by ground) 2018-19</u>	36
Appendix 3: <u>Congestion charge statistics 2014-2019</u>	37
Appendix 4: <u>Congestion charging map</u>	38
<u>Ultra Low emission zone map</u>	38
<u>Useful addresses</u>	39
<u>Back cover</u> - contact information	



1. Aims and objectives of the Road User Charging Adjudicators

- ♦ To provide all parties to road user charging appeals with independent, impartial and well-considered decisions based on clear findings of fact and the proper application of law.
- ♦ To have the appropriate knowledge, skills and integrity to make those decisions.
- ♦ To ensure that all parties to road user charging appeals are treated equally and fairly regardless of age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief or sex.
- ♦ To enhance the quality and integrity of the road user charging appeals process.



2. The role of the Road User Charging Adjudicators

- ♦ Adjudicators are appointed in accordance with Regulation 3 of the *Road User Charging (Enforcement and Adjudication) (London) Regulations 2001, as amended*.
- ♦ Their role is set out by Regulations 11(2) and 16(2) of the same Regulations which state that an Adjudicator “shall consider the representations in question and any additional representations which are made by the appellant on any of the grounds mentioned in Regulation 10(3) or Regulation 13(3).
- ♦ The Court of Appeal has made it clear, in the case of *R (on the application of Joan Margaret Walmsley) v Transport for London* [2005] EWCA Civ 1540 (17th November 2005), that it is not part of the Adjudicator’s role to consider factors which fall outside of the grounds mentioned in Regulations 10(3) or 13(3) and accordingly what might be described as ‘mitigating factors’ are matters for the Enforcing Authority to consider and are not matters for Road User Charging Adjudicators.



3. “Statement of Requirements”

- as defined by the Greater London Authority (‘GLA’) and setting out the roles of the Chief Adjudicator and Adjudicators. In this Statement any reference to the “Service Provider” is a reference to London Councils which currently operates the Road User Charging Appeals (RUCA) Service under contract with the GLA .

1.Introduction

- 1.1 The Appeal Service is an independent judicial body providing decisions for appeals made against Transport for London (TfL) decisions to reject representations made against Penalty Charge Notices issued under the Road User Charging Scheme(s) operated by TfL.
- 1.2 Currently these schemes are the central London Congestion Charging Scheme and the London Ultra Low Emission Zone. Both Schemes fall under the adjudication provisions set out in the Road User Charging (Enforcement and Adjudication) (London) Regulations 2001 as amended, the “Enforcement Regulations” and the relevant “Schedule” to it.
- 1.3 Adjudicators are appointed by the Lord Chancellor.
- 1.4 Adjudicators are supported by administrative staff and have facilities provided for them to enable them to sit and determine appeals. The GLA, as the authority, are required to make provision for these services and undertake this through appropriate outsourcing.
- 1.5 The Adjudicators are guided and managed by a Chief Adjudicator; subject to the provisions of the Schedule, an adjudicator may regulate his own procedure and this is primarily derived through the Chief Adjudicator.

2. Chief Adjudicator Role

- 2.1 The Chief Adjudicator is a judicially appointed role and is the representative head of the “Tribunal” which encompasses the Adjudicators. The Chief Adjudicator is accountable to the Lord Chancellor by way of appointment but also to the GLA. The Chief Adjudicator is not an employee of either GLA or the Service Provider, albeit that payroll and other such services shall be provided for the Chief Adjudicator and Adjudicators by the Service provider.
- 2.2 The role of the Chief Adjudicator means they work very closely with and in conjunction with the Service Provider and the role aims to ensure a smooth and cost efficient delivery of the Decision making aspects of the Adjudication role. The role extends through to “managing” the Adjudicators in terms of administration and setting and determining policy and procedural guidelines, training and development and dealing with complaints. This also extends to a range of other functions including the consideration and distribution of cases to the Adjudicators for them to hear.

2.3 The Chief Adjudicator has a wide role to play within the operation of the Tribunal with duties covering and not limited to:

- Appointing Adjudicators, with leave of the Lord Chancellor;
- Determining the terms and conditions of such appointments and extending appointments;
- Defending legal proceedings brought against Adjudicators;
- Acting as the point of contact for media relations and promoting the work of the Tribunal.

2.4 The role of the Chief Adjudicator also extends into dealing with complaints made against Adjudicators under the Appeal Service's complaints policy and includes an advisory role in relation to the Proper Officer and the Tribunal's Support Staff.

2.5 In addition the Chief Adjudicator has an advisory and informative role as they are required to produce an Annual Report.



3. Adjudicator Role

3.1 Adjudicators are appointed in accordance with Regulation 3 of the *Road User Charging (Enforcement and Adjudication) (London) Regulations 2001, as amended*.

3.2 Their role is set out by Regulations 11(2) and 16(2) of the same Regulations which state that an Adjudicator “shall consider the representations in question and any additional representations which are made by the appellant or any of the grounds mentioned in Regulation 10(3) or Regulation 13(3).

- 3.3 An Adjudicator's role does not allow them to consider factors which fall outside of the Grounds mentioned in Regulations 10(3) or 13(3), and accordingly what might be described as "mitigating factors". These are matters for TfL;
- 3.4 Adjudicators act and determine Appeals independently. They are not employees of either GLA or the Service Provider;
- 3.5 Adjudicators provide all parties in the Appeals process with independent, impartial and well-considered Decisions based on clear findings of fact and proper application of law;
- 3.6 Adjudicators have and maintain the appropriate knowledge, skills and integrity to make those decisions;
- 3.7 Adjudicators ensure that all parties to Road User Charging Appeals are treated equally and fairly regardless of age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief or sex;
- 3.8 Adjudicators aim to enhance the quality and integrity of the Road User Charging Appeal process.



4. Support Staff Role

- 4.1 The Support Staff provide administrative support to the Adjudicators, including and not limited to:
- Customer Service support;
 - Processing of Appeals and resolving queries over Appeals;
 - Scheduling Hearings.



4. Chief Adjudicator's foreword

I am pleased to present to the Secretary of State this joint report of the Road User (Congestion) Charging Adjudicators for the year 2018-19.

This joint report is required by Regulation 8 of the *Road User Charging (Enforcement and Adjudication) (London) Regulations 2001 (as amended)*.

The Tribunal has now determined more than 183,342 appeals since 2002, and in the last year achieved an average time of 25 minutes to determine a personal appeal and 13 minutes for a postal appeal. The average number of days for an appeal to be listed and decided has remained steady at 56 days.

In the last report I indicated that the Low Emissions surcharge had come into effect in October 2017. This has now been replaced by the Ultra-Low Emission Zone (ULEZ) which came into effect on 8th April 2019. This has already had an impact on the tribunal as several more classes of vehicle have now been brought within the charge – for instance 'L' type vehicles (motorcycles, motor tricycles and quad bikes) and 'M1' class vehicles (for instance car derived vans) are now within the scheme. The scheme operates 7 days a week and 365 days a year. Further details on the operation of the ULEZ scheme are given at Section 6 below.

The tribunal anticipated an upsurge in the number of appeals, which would coincide with the retirement of several adjudicators (who were appointed as long ago as 2004).

The tribunal decided to advertise for in excess of 20 new adjudicators and the process of appointment was begun in 2017.

We are very grateful to the staff of the Judicial Appointments Commission (in particular to Rebecca McKnight, Rachel Billingham) and to the Commissioner Emir Faisal, for their guidance in this process, which is in the last stages of appointment.

The names of the adjudicators recommended for appointment will be known shortly. I would also like to thank those existing adjudicators who gave a good deal of their own time in this recruitment process.

I would like finally to welcome two new members of the Tribunal staff – Anna Cossi and Desiree Pederson – who have already made a positive impact on our work.

Ingrid Persadsingh

Chief Road User Charging Adjudicator



5. Adjudicators who currently hear appeals

Mercy Akman

Jane Anderson

Gordon Cooper

Ian Coutts

Leslie Cuthbert

Anthony Edie

Fiona Henderson

John Lane

Maura Lynch

Isaac Maka

Ian Mohabir

Michael Nathan



Belinda Pearce

Ingrid Persadsingh

Luthfur Rahman

Christopher Rayner

Anita Reece

Timothy Smith

Alison Spicer

Christopher Woolley

6. The Ultra-Low Emission Zone

The implementation of the Ultra Low Emission Zone (ULEZ) from the 8th April 2019 had broader implications for Transport for London. This is because it also brought the expiry of the T-Charge under the Congestion Charging Scheme for all but registered residents of the zone. This had to be delivered alongside any ULEZ development.

TfL therefore had to evaluate the available information that would be available up to and through this transition and how it could inform individuals of their vehicles compliance status. This followed a similar pattern to the launch of the London Low Emission Zone in 2008 and the 'T-charge' for the Congestion Charge Scheme in October 2017. TfL also had to analyse the scheme and plan for all the changes the ULEZ brought.

Special consideration had to be given to certain vehicles which had not been impacted previously by TfL's existing Road User Charging Schemes. These being 'L type' vehicles which apply to motorcycles, tricycles and quadricycles. These types of vehicle currently were either exempt from or able to obtain a discount of the Congestion Charging Scheme and London Low Emission Zone schemes. In addition passenger vehicles, smaller commercial vehicles and petrol fuelled vehicles were now to be impacted by the ULEZ.

Throughout the ULEZ public consultation stages TfL tracked the suggested scheme options and assessed how they could be implemented. At the same time work was being undertaken to establish what data sources could be used to enable TfL to evaluate all vehicles emission levels.



The Ultra-Low Emission Zone (cont'd)

Whilst the Driver and Vehicle Licensing Agency (DVLA) would be the primary data source we had to consider how gaps may be plugged using the wider availability of vehicle emissions data. This was possible due to changes introduced by the European Union (EU) directives requiring manufacturers to measure and record vehicle emissions data.

This led TfL to the Vehicle Certification Agency (VCA) who was responsible for testing and approving all new vehicles to be sold in the UK. They were able to assist TfL with Particulate Matter (PM) and Nitrogen Oxides (NOx) emissions data for vehicles that could be used by TfL to assist in determining a vehicles compliance status, ULEZ charge and penalty charge levels as defined in the scheme order. This data was then used alongside the DVLA data and some data from vehicle manufacturers to develop an on-line ULEZ compliance checker which was made available many months before the ULEZ began. This resulted in a number of pre scheme enquiries and updates from the public.

TfL had to undertake a significant amount of monitoring to establish the possible vehicle volumes that were and may continue to use the ULEZ. This forecasting would help influence establishing resources required to cater for any increases in volumes. It would also assist in determining the target groups for awareness campaigns to the public for the new scheme.

The information campaign had to reach people who not only used the area of the congestion charging during the week during its charging hours of Monday to Friday, 7am to 6pm, but also those who used the area outside those hours and on a Saturday and a Sunday. It needed to put across the message that the ULEZ applied 24 hours a day, 7 days a week including bank holidays.

TfL made extensive use of the TfL website to promote the ULEZ, how vehicles may be affected, compliance options and wider scheme changes also introduced, supplemented by a broad publicity campaign across a range of media radio, TV and press advertising. It also included posters, on also line media to try and reach people who would be using the ULEZ. Existing customer databases for the Congestion Charge and Oyster were used to send awareness letters and e-mails tailored to the account type setting out the potential impacts of the ULEZ to the account holder and for vehicles associated to the account.

The campaign also set out changes that registered customers needed to be aware of which included the AutoPay services being extended to cover ULEZ charges, that Blue Badge holders were not exempt from the ULEZ and that Residents were initially outside the scope of the ULEZ, that they remained under the T-charge until they transitioned across into the ULEZ at a later date.

The Ultra-Low Emission Zone (cont'd)

Other parties impacted included registered Private Hire Drivers and Large Passenger vehicle registered got the 100% congestion charge discount and who achieved the LEZ emissions standard. In the case of the latter, they were affected by the tighter ULEZ emissions standards. The same information also had to be made available to non UK vehicle owner and drivers.

TfL systems had to be changed and updated to capture all these scheme requirements and changes to ensure the correct information could be relayed to a motorist for their vehicles, and this included confirming if they were impacted by the schemes emissions standards. These changes all had to be developed, tested and implemented in readiness for the 8th April 2019. TfL also had to engage with key stakeholders too throughout all its business processes to ensure that they were aware of any impacts to them and could adapt accordingly.

When looking at the enforcement provisions of the scheme TfL considered there was less to do as the scheme used the same regulatory framework as the existing Congestion Charge and LEZ schemes, and the solutions for those could be replicated for the ULEZ.

ULEZ Signage also needed to be discussed with the Department of Transport. Consideration had to be given to the fact the ULEZ would operate in the same area as the Congestion Charging scheme which had its own signs, and there was no recognised sign in the Traffic Signs and Regulation General Directions that could be used. Those discussions resulted in a new sign type being designed and authorised by the Secretary of State, in the same vein as the London Low Emission Zone sign to be used in conjunction with the congestion charge signs. The authorisation also enabled the use of a 'cover' sign over that could be used before the ULEZ was implemented to provide advance warning of the ULEZ.

To deal with the increased volume of enquiries, registrations and enforcement related correspondence TfL had to quickly expand its call centre and processing teams to firstly meet 'enquiry' volumes and provide responses and updates and to ensure they were trained to deal with the developing ULEZ scheme. This continued through the scheme development and to its implementation.

From a TfL perspective the launch of the ULEZ proved to be successful, with initial data indicating the public has generally taken the scheme on board as the compliance levels have exceeded the initial forecasts.

This is supported by the significant take up of new vehicles to existing or new accounts.

7. Unauthorised web sites

Transport for London have now closed unauthorised websites which offered (often for a fee) to purchase a congestion charge on behalf of a customer.

The only website which a person wanting to purchase a congestion charge needs to use is the dedicated site run by Transport for London.

8. The work of the duty adjudicator

If you were to ask a member of the public what an adjudicator does, he or she would probably reply “adjudicate”, by which they would almost certainly mean to make a decision on a dispute between two conflicting parties. That would not be an incorrect understanding, but there is more to a system of appeals than simply making a final decision in the case.



The public face of the tribunal is not, however, the whole story. There are numerous points to be decided which precede, or follow, the decision to allow or dismiss an appeal.

The task of dealing with many such decisions is known as interlocutory work and is undertaken by duty adjudicators (“interlocutory” meaning a step that is not final in the case).

The parties do not always follow correct procedure.

A penalty charge notice may be the subject of an appeal by the person who has been sent a notice of rejection by Transport for London, but appeals are sometimes submitted by a third party.

Decisions concerning the entitlement of a person to conduct an appeal may need to be referred to the duty adjudicator.

Parties sometimes send in a notice of appeal outside the time limit permitted under the regulations; the duty adjudicator must decide whether or not that appeal should be allowed to proceed.

Either party to an appeal may ask that the case should be rescheduled to a later date. Although administrative staff have authority to allow such a request, that authority is circumscribed, and if the request is outside the limits of administrative authority the request must be referred to the duty adjudicator for determination.

There may, too, be general queries from appellants who seek additional information about the appeal process generally, or about their case in particular. If these are not routine points that can be answered by administrative staff they will be referred to the duty adjudicator.

The work of the duty adjudicator (cont'd)

As well as dealing with matters concerning individual cases, the duty adjudicator will have some oversight on the state of the lists, involving checks to ensure that appropriate numbers of adjudicators are available to deal with the scheduled personal hearings, and that if there is an application to review an adjudicator's decision it will not be listed before that original adjudicator.

It is also an opportunity to monitor cases in which there has been unusual delay, and to take action to ensure that those cases are resolved as quickly as is consistent with the interest of justice.

Another element in the duty adjudicator's role is to deal with statutory declarations. A statutory declaration is a solemn statement made, not on oath, before a person authorised to receive it – a justice of the peace, solicitor or court official. The procedure is designed to rectify problems created when something has gone wrong with the proper progress of a case.

It is possible for the procedure to be utilised once enforcement action has reached the county court stage. It could happen that the person to whom a penalty charge notice has been issued does not receive it; if a statutory declaration to that effect is filed with the county court the enforcement action comes to an end and the matter is referred back to Transport for London who would normally reissue the penalty charge notice. That does not involve the duty adjudicator, but the other two situations in which a statutory declaration can be made do.

One is when the recipient of a penalty charge notice has made representations against the notice, and has not received a notice of rejection from Transport for London – the representations or response may have gone astray. The second is when a person has submitted a notice of appeal, but has had no response from the tribunal – again, the notice or the response may have gone astray. If the county court revokes the enforcement action the duty adjudicator has a wide discretion to make such direction as may be appropriate to the circumstances of the case. This will usually be to schedule an appeal for hearing, or to direct that the applicant pays the penalty charge.

It is not necessarily the end of matters once an adjudicator has made a decision on an appeal. The party receiving an adverse decision may ask for that decision to be reviewed by another adjudicator; the grounds for scheduling a review application are very limited, and the request will be referred in the first instance to a duty adjudicator who must act as a filter, deciding if the case should be listed for a hearing before another adjudicator. There are, too, frequently queries arising from appeal adjudications; if those are not routine they will be referred to a duty adjudicator.

These, and other miscellaneous tasks to support the role of the Chief Adjudicator, make up the work of the duty adjudicator. It may lack the interest of dealing with appellants in person, but it does not lack variety.

9. Recent cases in the tribunal

These two cases illustrate the issues which are currently being decided by the tribunal.

Example 1 - Adjudicator's Decision

This case comes before the adjudicator under Paragraph 12 of the *Schedule to The Road User Charging (Enforcement and Adjudication) (London) Regulations 2001 (as amended)* by way of an application for review of the original decision on the appeal.

The adjudicator, having considered the evidence submitted by the parties, has determined that the appeal against liability for the charge should be refused.

Adjudicator's Reasons

Parties

1. This is an application for review by the Appellant, Mr Morris, against the decision made by another Adjudicator, Mr Edie, on 13 August 2019, refusing the appeal against the penalty imposed by Transport for London, relating to the London Ultra Low Emission Zone (ULEZ).



2. The application for review was scheduled for a personal hearing at 10.00 am on Thursday 17 October 2019. A Mr Garrett, on behalf of Transport for London, attended the personal hearing. Mr Morris had written in, by e-mail on 14 October 2019, indicating that it was his understanding that the review would take place on a paper basis and that in the absence of his supporter, Miss Anderson, who assisted him at the original oral hearing on 13 August 2019, he did not wish to attend and relied upon his written submissions.

Issue

3. The responsibility is upon the Appellant to satisfy me, more likely than not, that one of the grounds justifying a review is made out.

Recent cases in the tribunal (cont'd)

Law

4. The grounds justifying a review under Paragraph 12 of Part II of the Schedule to the *Road User Charging (Enforcement and Adjudication) (London) Regulations 2001, as amended*, are that:

- 1) the decision was wrongly made as a result of an error on the part of the administrative staff;
- 2) that a party failed to appear at a hearing having good and sufficient reason for failing to appear;
- 3) that new evidence has become available that was not reasonably foreseeable at the time of the hearing or
- 4) that a review is required in the interests of justice.

5. If a review is justified then, under Paragraph 12(4) of Part II of the Schedule, the Adjudicator considering the review may direct the original decision be set aside and may substitute such decision as he thinks fit or order a re-determination by either the same or a different adjudicator.



Ground put forward in this application for review

6. The Appellant, in his 8 page application for review dated 18 August 2019, puts forward that a review is required in the interests of justice on the basis that:

- (i) The Adjudicator had failed to apply the law correctly in his decision, specifically at paragraphs 17 - 20 of his decision and
- (ii) that he should not have to pay £160 and not be put to the cost of undertaking Judicial Review proceedings.

Transport for London's position

7. The representative for Transport for London asserted that the original Adjudicator made no error in law and that there was no justification for a review.

Recent cases in the tribunal (cont'd)

Conclusion

8. Dealing with the Appellant's second basis for seeking a review, namely that he should not have to pay the £160 penalty nor incur costs in pursuing judicial review proceedings, if this was a justification for allowing a review then any appellant whose appeal was refused would be able to seek a review since every appellant would then have a penalty or penalties that had to be paid. As for the issue of judicial review proceedings that is a separate matter and should any individual wish to pursue such proceedings that is a choice for them, however, the prospect of judicial review proceedings cannot be a basis for arguing that a decision should be reviewed 'in the interests of justice' since, again, anyone suggesting that they intend to potentially judicially review a decision would then automatically be entitled to a review of the decision relating to their appeal.

9. Turning to the Appellant's first basis for seeking a review, namely that the previous Adjudicator, Mr Edie, failed to apply the law correctly, if this submission is correct then this would indeed be a justification for a review.

10. In considering whether Mr Edie erred in law I took into consideration both the Appellant's original representations and his representations seeking a review in which he again referred to an article in The Mail on Sunday newspaper, as well as two High Court decisions relating to penalties imposed in respect of contraventions relating to parking and travelling in bus lanes.

Whilst I accept that these decisions may be analogous to penalties imposed in relation to the Ultra Low Emission Zone they do not relate to the same statute or regulations. I also note that the Appellant accepts that "the majority" of what Mr Edie set out in his decision was accurate.

The Appellant makes particular reference to paragraph 5 of Mr Edie's decision which does not relate to an analysis of the law but rather expresses a view as to the newspaper article produced by the Appellant.

He also points out that the Adjudicator, in paragraphs 7 and 8 of the original decision, refers to certain paragraphs of the two High Court decisions but does not refer to paragraphs which Mr Morris set out in his case summary.

Whilst I accept that the Adjudicator did not do so it is not a requirement that everything contained within a party's submissions, or indeed that all paragraphs of an authority which is cited, must be reiterated in an Adjudicator's decision.

Recent cases in the tribunal (cont'd)

Mr Morris also drew attention to paragraph 63 of the decision in *Oxfordshire County Council v The Bus Lane Adjudicator* [2010] EWHC 894 (Admin), which he had not specifically referred to in his original submissions, but which is the essence of his case namely that there is a duty to place signs providing adequate information in relation to a penalty scheme, a concept which Mr Edie distinctly referred to in his decision.

11. In respect of paragraphs 17 - 20, where Mr Morris specifically states that Mr Edie got the law wrong, in paragraph 17 the point Mr Morris makes is that the Controlled Zone sign does refer to parking, by use of the symbol, whilst Mr Edie states that there is no reference to parking on the sign. It is correct that there is no word for parking contained on the sign but I equally recognise Mr Morris's point that the symbol may well be recognised by many people as one used to denote something to do with parking. However, this sign is not the one which is relevant to this case and whether Mr Edie's interpretation or Mr Morris's is correct in relation to that sign has no bearing on the Ultra Low Emission Zone penalty and is not indicative of an error of law by Mr Edie.



12. Paragraph 18 merely states factually the difference between an Ultra Low Emission Zone sign and a Low Emission Zone sign and therefore is not wrong in law.

13. Paragraph 19 of Mr Edie's decision refers to the authorisation of the signage used by Transport for London by The Secretary of State for Department of Transport and accurately reflects that Mr Morris does not assert that the signage does not conform to the requirements of that authorisation nor suggests that signs were placed in a way that meant that they were not visible at all entry approaches to the Ultra Low Emission Zone.

14. However, Mr Morris, on page 7 of his request for a review, refers to the 'Oxfordshire' High Court decision as precedent for the principle that, "The fact that signs are prescribed or authorised DOES NOT MEAN they are sufficient for securing adequate information as to the effect of the order".

Recent cases in the tribunal (cont'd)

Accordingly, I take this to mean that Mr Morris considers that an Adjudicator may conclude, despite authorisation by the Secretary of State, that a sign contains inadequate information as required by Regulation 18 of the *Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996*. However, this works on the assumption that such Regulations do indeed relate to signs which cover the Ultra Low Emission Zone. I am not satisfied that such Regulations do apply since such Regulations flow from the *Road Traffic Regulation Act 1984* whilst the Ultra Low Emissions Zone comes from the *Greater London Authority Act 1999*.

However, proceeding on the basis that signage relating to the ULEZ ought to comply with Regulation 18 of the *Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996*, as Mr Edie appears to have concluded, Transport for London has provided a document with the reference GT50/139/0171 being the 'Authorisation of Traffic Signs and Special Directions' signed by the Secretary of State for the Department of Transport and dated 7 August 2018. This specifically sets out that the signs which have been erected by Transport for London were authorised without prejudice to any regulations made under paragraph 22(1)(e) of Schedule 9 to the *Road Traffic Regulation Act 1984 which the Local Authorities' Traffic Orders (Procedure) England and Wales) Regulations 1996* were.



Accordingly, the Secretary of State, by authorising the signage to be displayed as shown by Transport for London in its case summary, must have formed the view that the signage did comply with The *Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996* by containing adequate information as to the effect of the order and that they were being placed in such positions to ensure that such information was made available to persons using the roads.

In my judgment it is not within my power or jurisdiction, or that of any Adjudicator, to act contrary to the will of Parliament in the form of the opinion of the Secretary of State for the Department of Transport.

Recent cases in the tribunal (cont'd)

15. However, if I am incorrect and it is open to an Adjudicator to potentially find signage to be inadequate, despite the Secretary of State's authorisation, Mr Edie, at paragraph 20 of his decision, specifically finds that, "the signage gave adequate notice to the user that there was a restriction on emissions. In my view the Appellant should have been put on notice, if he had seen the signs, that a restriction existed concerning his vehicle emissions which applied 'At all times'." This is not an error of law but rather is Mr Edie's conclusion applying the facts of the case to the law. Mr Morris may disagree with Mr Edie's conclusion as to the adequacy of the signage but that is a disagreement as to the application of the facts to the law - not an error in law itself.

16. Accordingly, as I am satisfied that none of the grounds justifying a review under Paragraph 12 of Part II of the Schedule to the Regulations is made out, I refuse the application for a review. The original decision made by Mr Edie, which I set out below, remains in force.

Mr Edie's original decision

Parties

1. The Appellant, Mr Robert Morris, attended for a personal hearing and presented his case with assistance from Miss Catherine Anderson who had helped in researching the legal background to the case. The appeal is against the penalty imposed by the Authority relating to the Ultra Low Emission Zone. The Authority did not appear and was not represented.

Issue

2. The responsibility is upon the Authority initially to demonstrate that there may have been a 'contravention', that is a breach, of the Ultra Low Emission Zone scheme (ULEZ). If I am satisfied from the evidence that there has been a potential contravention then the responsibility moves to the Appellant to satisfy me, more likely than not, that one of the six grounds of appeal as set out in the relevant regulations is made out.

Law

3. The law relating to penalties imposed in regards to the Ultra Low Emission Zone (ULEZ) is set out in the *Greater London Low Emission Zone Charging Order 2006* as amended. The relevant regulations relating to the possible grounds of appeal are Regulation 13(3) of the *Road User Charging (Enforcement and Adjudication) (London) Regulations 2001, as amended*.

Recent cases in the tribunal (cont'd)

Ground of appeal in this appeal

4. The Appellant's grounds of Appeal are that in the circumstances of the case, no penalty charge is payable. The Appellant travelled to London on Wednesday 15th May 2019 during the evening and returned on Friday 17th May 2019. It was only after going online to pay the Congestion charge that the Appellant realised that there was a ULEZ scheme in operation. There is a link on the website which drew his attention to the scheme. The Appellant made further enquiries and was able to pay a ULEZ charge for 17th May but discovered that he was unable to pay the charge for the 15th May because the payment window had expired.

5. Put briefly the Appellant's case is that the information shown on the ULEZ signage was inadequate. The signs do not refer to a charge being payable. Neither do the signs say when or how that charge has to be paid. The Appellant also pointed out that disproportionate numbers of users have been confused by the signage as evidenced by newspaper articles and activity on the internet.

6. The Appellant argued that the road signs were not compliant with the requirements of Regulation 18 of the *Local Authorities Traffic Orders (Procedure) Regulations 1996* which provide that an authority must insure that 'adequate information as to the effect of the order is made available to persons using the road'.

The Appellant further argued that his case was supported by the decisions in 2 cases namely *Herron -v- Parking Adjudicators and Sunderland City Council* [2011] EWCA Civ 905 ('Herron') and *Oxfordshire County Council -v- The Bus Lane Adjudicator* [2010] EWHC 894 (Admin) ('Oxford').

'Herron'

7. Particular reference was made to the passage at paragraph 35 of the judgement of Stanley Burnton LJ:-

'35. It has long been recognised that the enforceability of a TRO requires that adequate notice of the applicable restriction is given to the road user. This principle is derived from the duty imposed by Regulation 18 of the Procedure Regulations, which I have set out above.

In *Macleod v Hamilton* 1965 S.L.T. 305 Lord Clyde said, at 308:

Recent cases in the tribunal (cont'd)

'It was an integral part of the statutory scheme for a traffic regulation order that notice by means of traffic signs should be given to the public using the roads which were restricted so as to warn users of their obligations. Unless these traffic signs were there accordingly and the opportunity was thus afforded to the public to know what they could not legally do, no offence would be committed. It would, indeed, be anomalous and absurd were the position otherwise.'

Lord Migdale said, at.309:

'. . . the order is not effective unless and until the council complies with Regulation 15(c) and erects road signs at the locus. Signs were erected but they were not the proper ones nor were they clear.

The regulation to which Lord Migdale referred was in the same terms, so far as material, as Regulation 18 of the Procedure Regulations.'

'Oxford'

8. Again in Oxford the principle was restated in the judgement of Beatson J at paragraph 65:-

'65. The Defendant's submission that the fact that signs are prescribed or authorised does not mean they are sufficient for securing adequate information as to the effect of an order is made available to road users is clearly correct. If the signs do not in fact provide adequate information no offence is committed; see *James v Cavey* [1967] 2 QB 676. Such information is a requirement and, as Jackson J stated in *R (Barnett LBC) v Parking Adjudicator* [2006] EWHC 2357 (Admin) at [41], if the statutory conditions are not met the financial liability does not arise.'

Authority's case

9. The Authority asserts that the signs are adequate. The ULEZ signs were placed and orientated to ensure that they would be visible on all entry approaches to the ULEZ. Although the ULEZ signs do not appear in The Traffic Signs Regulations and General Directions 2016 (TSRGD) they are subject to special authorisation. They also have a supporting lower panel or 'time plate' however there are numerous examples of Regulatory signs which do not include a 'time plate' because the principle in place is that where there is no time or day information provided on a traffic sign, drivers should generally make the automatic presumption that the sign applies at all times.

Recent cases in the tribunal (cont'd)

10. The Authority also asserts that signing best practice requires signs be as concise and clear as possible so additional unnecessary information should be avoided. However although the ULEZ operates in exactly the same area as Congestion Charging, Congestion Charging only operates on Mon-Fri from 7am - 6pm. Because the signs would be placed adjacent to each other the additional text "At All Times" was added in the lower panel to ensure clarity and ensure that drivers did not think the ULEZ applied at the same hours as Congestion Charging or vice versa.

11. The Special Authorisation directs that ULEZ entry signs (Types A & B) must be placed to indicate the entry to the scheme. These are the only sign types that are mandatory. Sign Type A is used where the ULEZ signs are mounted alone. Sign Type B is used where the 'Transport for London' header is not required because the signs are mounted directly below a Congestion charging sign (which already bears the TfL header).

12. With regard to publicity the Authority states as follows:-

'The major publicity campaign we launched in May 2018 aimed to promote the ULEZ and to ensure drivers and businesses are ready for the ULEZ. Since June 2018 we have sent 3.3 million awareness emails to customers in our databases, including congestion charging and oyster card account holders. At the point of the scheme commencement we had issued 5.3 million e-mails. Additionally we sent over 600,000 letters through the DVLA to vehicle owners whose vehicle had been within the central London Congestion Charge Zone since October 2017. These letters were sent to vehicles considered to be non-complaint with the ULEZ.

We have also undertaken a multimedia campaign that has included Posters using large digital formats, roadside and sites across the TfL network. We have also placed reminders of the ULEZ on the Congestion Charge payment receipt's we have issued. We have also run radio adverts across 10 London channels. Undertaken a wider ranging press campaign using both National and London press and into Trade press publications too, such as Fleet World, Motor Cycle News and Truck and Driver. We have extended advertising across 'Google search adverts' that directed those interested to the TfL website for further information, Additionally to Petrol station screens and nozzles, used online videos targeting London drivers to get them ready for launch. We have also developed a partnership with 'Waze' (a global driving app) to make 1 million London drivers aware of the new ULEZ boundary.

Recent cases in the tribunal (cont'd)

Subsequently our online vehicle checker had been accessed over 3.3 million times up to the schemes launch. The checker sets out our view of the vehicles status under the ULEZ. Fuller details of our campaign and examples of the publicity are shown in 'ULEZ Publicity campaign' document the appended to this case summary.

Motorists are made aware when they are about to enter the ULEZ through the use of regulatory 'Ultra Low Emission Zone' entry signs. We have installed over 300 new ULEZ signs at the side of every road that enters the ULEZ. They are placed on or near the boundary in accordance with the Department for Transport (DfT) authorisation GT50/139/0171. At least one entry sign has been placed on each entry road with larger multi-lane roads generally having two signs. The number, location and orientation of the ULEZ signs required were considered carefully to ensure the regulatory signs would be visible on all entry approaches to the ULEZ.'

Facts not in dispute

13. There is no dispute that the vehicle was registered to the Appellant, as is also confirmed by the evidence I have been provided with from the Driver and Vehicle Licensing Agency (DLVA). The DVLA also confirm that vehicle uses diesel fuel.



14. It is also not disputed that the vehicle was used in Gower Street South on 15th May 2019, within the Ultra Low Emission Zone, when no payment for that vehicle, for that date, was received by Transport for London.

15. The signage was authorised by the Secretary of State at the Department of Transport on 1st August 2018.

Conclusion

16. I have carefully considered the evidence and accept the principle set out in the case of 'Herron' by Stanley Burnton LJ 'that the enforceability of a TRO requires that adequate notice of the applicable restriction is given to the road user.' However in deciding what amounts to 'adequate notice of the applicable restriction' I have to take into account and accept that 'best practice requires signs be as concise and clear as possible so additional unnecessary information should be avoided'.

Recent cases in the tribunal (cont'd)

17. In 'Herron' at paragraph 12 the sign illustrated in the Traffic Signs Regulations and General Directions 2002 (TSRGD), diagram 663 is referred to. The only words appearing on the sign are 'Controlled Zone' and the lower panel, which includes details of the times of restriction, may 'be omitted where the restrictions apply at all times'. The sign makes no reference to parking.

Similarly the sign used for the Low Emission Zone only includes the words 'Low Emission Zone' and does not include a reference to the times of operation.

18. The sign in question is identical in content to the Low Emission sign but also includes the words 'At all times' for the reasons referred to above.

19. There is no suggestion in this case that the signage does not conform to the requirements of the authorisation or that they were not placed and orientated to ensure that they would be visible on all entry approaches to the ULEZ.



20. I conclude that the signage gave adequate notice to the user that there was a restriction on emissions. In my view the Appellant should have been put on notice, if he had seen the signs, that a restriction existed concerning his vehicle emissions which applied 'At all times'.

21. Whilst I have no doubt of the truthfulness of the Appellant's account of not being aware of the existence of the Ultra Low Emission Zone or of needing to purchase the appropriate daily charge to drive their vehicle within the Ultra Low Emission Zone these facts do not amount to a ground of appeal as set out in Regulation 13(3) of the *Road User Charging (Enforcement and Adjudication) (London) Regulations 2001, as amended*.

22. The vehicle is a Land Rover type vehicle, which uses diesel fuel, and was manufactured in 2002 and I am satisfied that the vehicle was liable to the Ultra Low Emission scheme and was required to pay a daily charge to avoid a penalty. The evidence shows that the vehicle was used within the Ultra Low Emission Zone and that no daily charge was purchased. A penalty charge was therefore issued.



Recent cases in the tribunal (cont'd)

23. The Ultra Low Emission scheme came into force on 8 April 2019 and applies to all vehicles that do not meet the relevant emissions standards as set out in the Charging Order, as amended.

24. The Appellant has referred to mitigating circumstances but the Authority has chosen not to exercise its discretion to waive the penalty in this case. No such discretion is available to me [Walmsley v TfL & Others. EWCA Civ 1540].

25. Accordingly, since I am satisfied that none of the grounds of appeal under the Regulations are made out, having considered all six, not simply the grounds of appeal raised by the Appellant,

I therefore have no option but to find in favour of the Authority and must refuse the appeal.

Amount to be paid

26. The penalty is £160.00 if paid within 28 days. If full payment has not been made within 28 days of the date of this letter, the penalty amount will increase by 50% and the Authority will be able to pursue its normal enforcement procedures.



Recent cases in the tribunal (cont'd)

ii) Appeal example 2 - Adjudicator's Reasons

This appeal is brought under Regulation 13(3) (f) of the Road User Charging (Enforcement and Adjudication) (London) Regulations 2001, that the Appellant is a vehicle hire firm and the vehicle in question was hired under a valid hire agreement.

The Appellant requested a personal hearing due to commence at 12noon. Mr Shaffiq, a partner in the company, appeared to present the case at 12.30.

Most of the facts of are agreed. The case concerns a penalty arising on 12th and 13th June, 2019 in respect of vehicle registration WR68 TZD. The Appellant is Simple Self Drive which is the registered keeper.

Mr Shafiq who runs the vehicle hire company, asserts Simple Self Drive conducts approximately 95% of its business with PCO drivers. He asserts it transferred liability via a valid hiring agreement made with a third party, this agreement being typical of many which have not been rejected until recent changes on 8th April, 2019 when PCO drivers were no longer exempt from the congestion charge.



The agreement in question was submitted in representations to TfL on 27th June, 2019. Mr Shafiq argues the agreement is compliant with the regulations because in all cases vehicles are actually returned within the less than six month limitation period even though the initial period of hire shown on the agreement might be longer. Periods in excess of six months are recorded to satisfy insurance, UBER and other taxi organisation requirements, but do not represent the reality or the hire agreement.

Transport for London (TfL) asserts that the hire agreement produced in evidence is invalid and incapable of transferring liability because, at the time of making it, the hire period exceeded the statutory limit of less than six months.

Regulation 6 (2) of the Road User Charging (Charges and Penalty Charges) (London) Regulations, 2001 establishes that the registered keeper is liable for penalties unless certain exceptions apply.

Subsection (6) applies in this case so that liability is only transferred where the registered keeper is a vehicle hire firm, where the relevant vehicle is hired under a hiring agreement and where the hirer signs a statement of liability in respect of charges and penalty charges which may be incurred under the Congestion Charging Scheme.

Recent cases in the tribunal (cont'd)

The agreement must fulfil the requirements of Section 66(7) Road Traffic Offenders Act 1988, so that:

- (a) the agreement must be for less than six months; and
- (b) the hirer must have signed a statement of liability for any penalty charges incurred during the currency of the hiring agreement.



The agreement must also specify particulars in Schedule 2 of the Road Traffic (Owner Liability) Regulations 2000:

- (a) particulars of the person signing statement of liability, and
- (b) particulars of hiring agreement-registration, make and model of vehicle hired or substituted under the hiring agreement and the time and date of any change or substitution; time and date of commencement of original hire period and time and date of expected expiry; the time and date of commencement of any authorised extension and the expected time and date of expiry of that extension; and, finally, the actual time and date of return of vehicle.

I have considered the documentary evidence supplied in this case and particularly the hiring agreement. It is the documentary agreement which is crucial here. The agreement shows that there is a clear non-compliance with section 66(7) above in that the term of hire, commencing 28th March, 2019 and ending 13th December, 2019 (with actual return on 28th August, 2019) exceeds the statutory maximum of less than six months. The agreement must show that, at the time of making it, 28th March, 2019, the period of hire is less than six months. I have no discretion here and am unable to take into account any arrangement or practice which otherwise purports to give compliance to section 66(7) above.

In the absence of a valid agreement made between a hire company and a third party fully compliant with these legislative requirements throughout a specified hiring period of less than six months, I am obliged to uphold the legislative assertion contained in Regulation 6, above, that the registered keeper is liable for charges and penalty charges.

The appeal is refused. TfL agrees to payment at the discounted rate of £80 for each penalty (total £160) for fourteen days from the date of this decision, and then at the full rate of £160 (total £320) for a further fourteen days. Thereafter, the full penalties will increase by 50%.

10. Useful Information

The structure of the Road User Charging Adjudicators' Tribunal

What is 'RUCAT'?

RUCAT is the 'Road User Charging Adjudicators Tribunal'. It is an independent tribunal which decides appeals against Congestion Charge and Ultra Low Emission Zone penalties in London.

Who are London Tribunals?

London Tribunals provides administrative support to the Road User Charging Adjudicators. Under the *Road Traffic Act 1991* and the *Traffic Management Act 2004*, London Councils is required to provide this service to the Environment and Traffic Adjudicators and provides the same service for the Road User Charging Adjudicators under contract to the GLA.

The following diagram explains the structure of RUCAT and London Tribunals:



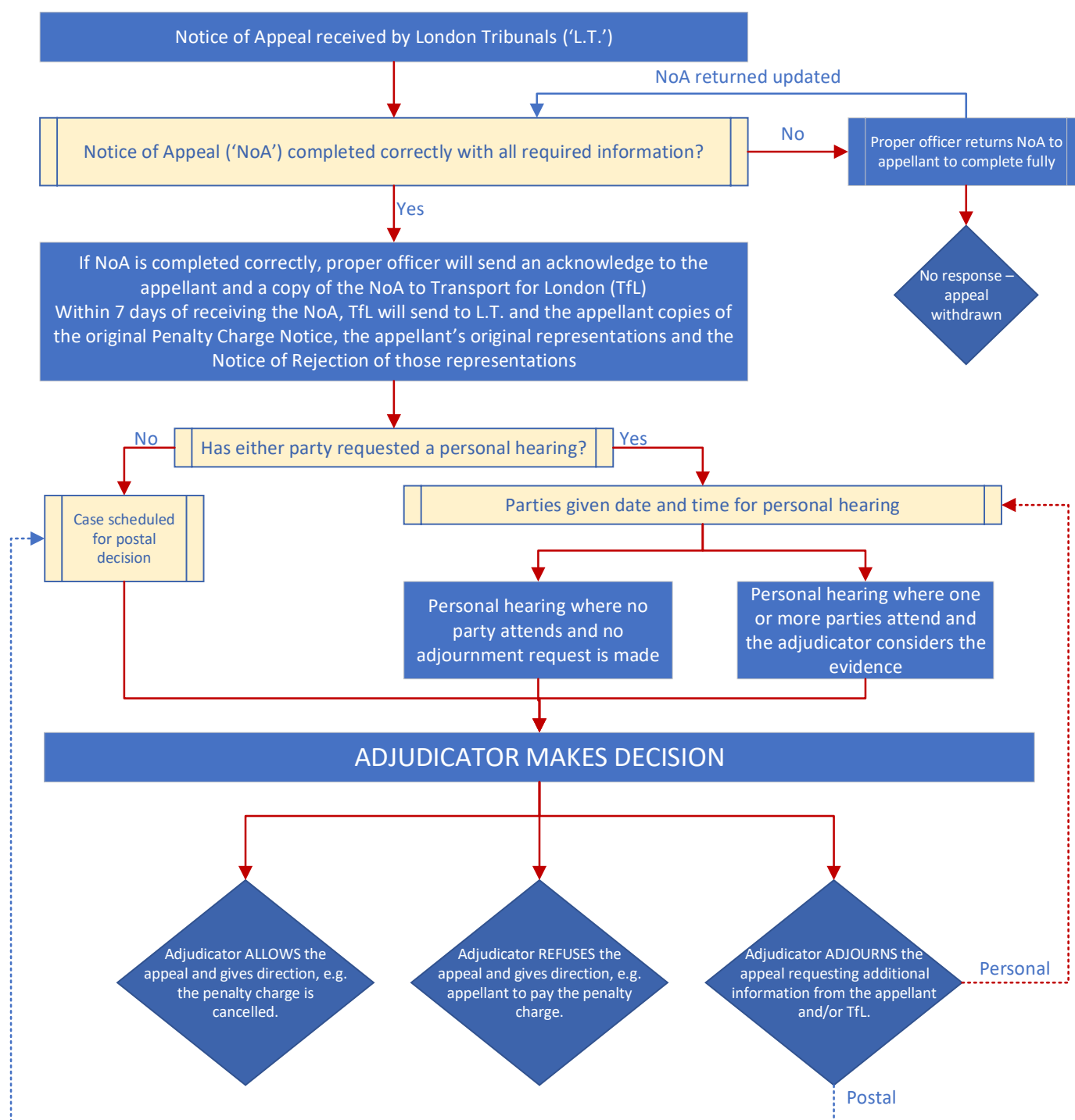
The appeal process

If Transport for London ('TfL') serves a Penalty Charge Notice ('PCN') arising from an alleged Congestion Charge or Ultra Low Emission Zone contravention, the registered keeper of the vehicle is entitled to contest the penalty charge by making written representations to TfL.

If TfL accepts those representations, then the PCN will be cancelled.

If TfL rejects the representations, the registered keeper of the vehicle may APPEAL to the Road User Charging Adjudicator. The APPEAL is an appeal against TfL's decision to reject the written representations.

The following diagram explains the process of an appeal once it is received by London Tribunals ('L.T.').



Grounds of appeal

Initially the responsibility is on Transport for London ('TfL') to demonstrate that a contravention has occurred.

This means that TfL must produce evidence to the Adjudicator to prove that:

- 1) A relevant vehicle;
- 2) was used or kept within the congestion charge area or low emission zone;
- 3) during the designated hours of a particular date; and
- 4) that the appellant is the registered keeper of the vehicle; and
- 5) that the correct payment for that vehicle for that date has not been received by TfL or that the vehicle was not subject to an exemption.

If TfL produces this evidence, the onus will shift to the appellant to satisfy the Adjudicator that, on the balance of probabilities, one or more of the six statutory grounds of appeal applies.

These grounds are:

(a) that the recipient -

- (i) never was the registered keeper in relation to the vehicle in question; or
- (ii) had ceased to be the person liable before the date on which the vehicle was used or kept on a road in a charging area; or
- (iii) became the person liable after that date.

(b) that the charge payable for the use or keeping of the vehicle on a road on the occasion in question was paid at the time and in the manner required by the charging scheme.

(c) that no penalty charge is payable under the charging scheme.

(d) that the vehicle had been used or kept, or permitted to be used or kept on a road by a person who was in control of the vehicle without the consent of the registered keeper.

(e) that the penalty charge exceeded the amount applicable in the circumstances of the case.

(f) that the recipient is a vehicle hire-firm and;

- (i) the vehicle in question was at the material time hired from that firm under a hiring agreement; and
- (ii) the person hiring it had signed a statement of liability acknowledging his liability in respect of any penalty charge notice imposed in relation to the vehicle during the currency of the hiring agreement.

These grounds apply to both alleged congestion charge and ultra low emission zone contraventions.

The Adjudicator CANNOT consider mitigating factors. This has been upheld by the High Court.

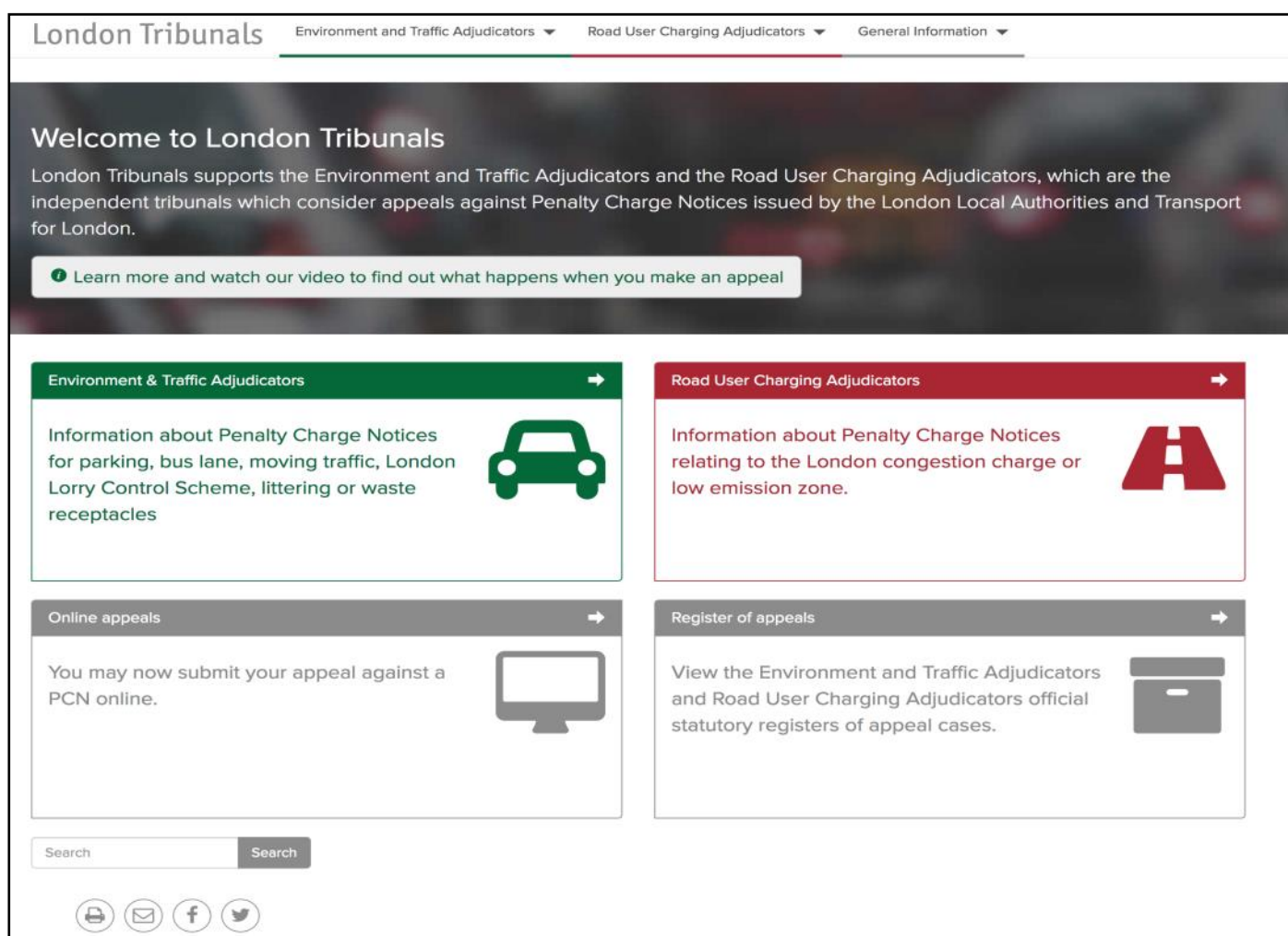
London Tribunal's website

London Tribunals maintains a website (www.londontribunals.gov.uk) with the aim of providing information, guidance and assistance to anyone intending to appeal to the tribunal.

The daily lists of each day's cases before the tribunal can be viewed, as well as maps and travel advice on getting to the hearing centre.

The website offers a useful guide to each stage of the enforcement process, explaining the options available to the appellant at each stage.

The Statutory Register (see page 33) can also be accessed through this website.



Statutory register

This is the official register of cases at the Road User Charging Tribunal, kept under Section 21 of the Schedule to the *Road User Charging (Enforcement and Adjudication) (London) Regulations 2001 (as amended)*.

It is a register of all appeals and the decisions made on them.

The Register can be viewed online at <https://www.londontribunals.gov.uk/> and can be browsed for one day of appeals at a time, or a more specific search (looking, for instance, at the appellant's name) can be made.

The Register can also be examined at the hearing centre.

Environment and Traffic Adjudicators (ETA)

The **Browse** link allows you to browse backwards and forwards through the **Environment & Traffic Adjudicators** register day by day.

[Browse](#)

The **Search** link allows you to search the register by:

- Case reference
- Appellant last name
- Appellant first name(s) (Must supply at least one more search value)
- Appellant company
- Enforcing authority (Must supply at least one more search value)
- PCN
- Date of decision (Must supply a date range)
- Decision (Must supply at least one more search value)

Note that a maximum of the first 500 cases are returned for any search.

[Search](#)

Road User Charging Adjudicators (RUCA)

The **Browse** link allows you to browse backwards and forwards through the **Road User Charging Adjudicators** register day by day.

[Browse](#)

The **Search** link allows you to search the register by:

- Case reference
- Appellant last name
- Appellant first name(s) (Must supply at least one more search value)
- Appellant company
- Enforcing authority (Must supply at least one more search value)
- PCN
- Date of decision (Must supply a date range)
- PCN location (Must supply at least one more search value)
- Decision (Must supply at least one more search value)

Note that a maximum of the first 500 cases are returned for any search.

[Search](#)

Previous annual reports *(click on year button to view report)*



2003-04



2004-05



2005-06



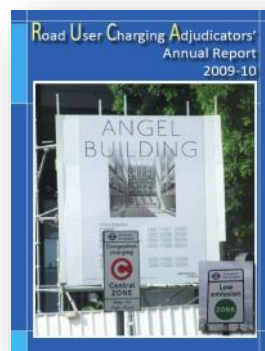
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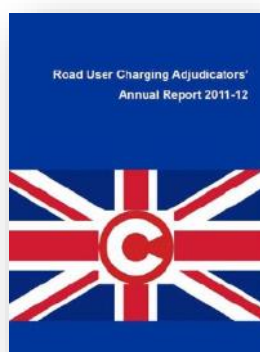
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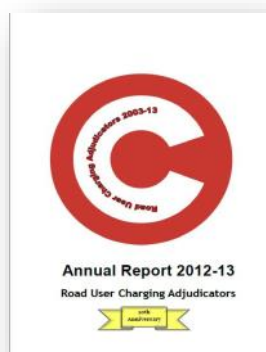
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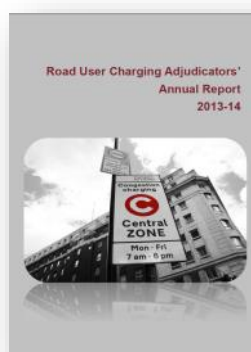
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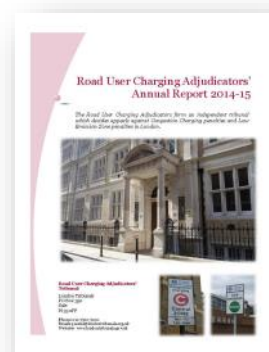
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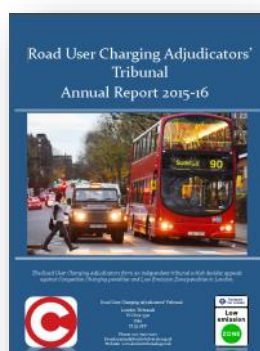
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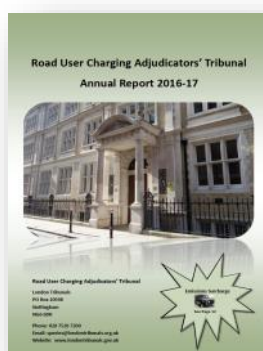
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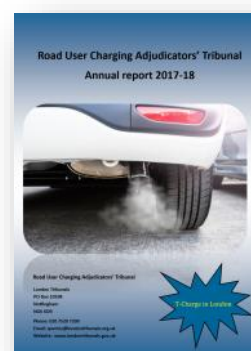
2014-15



2015-16



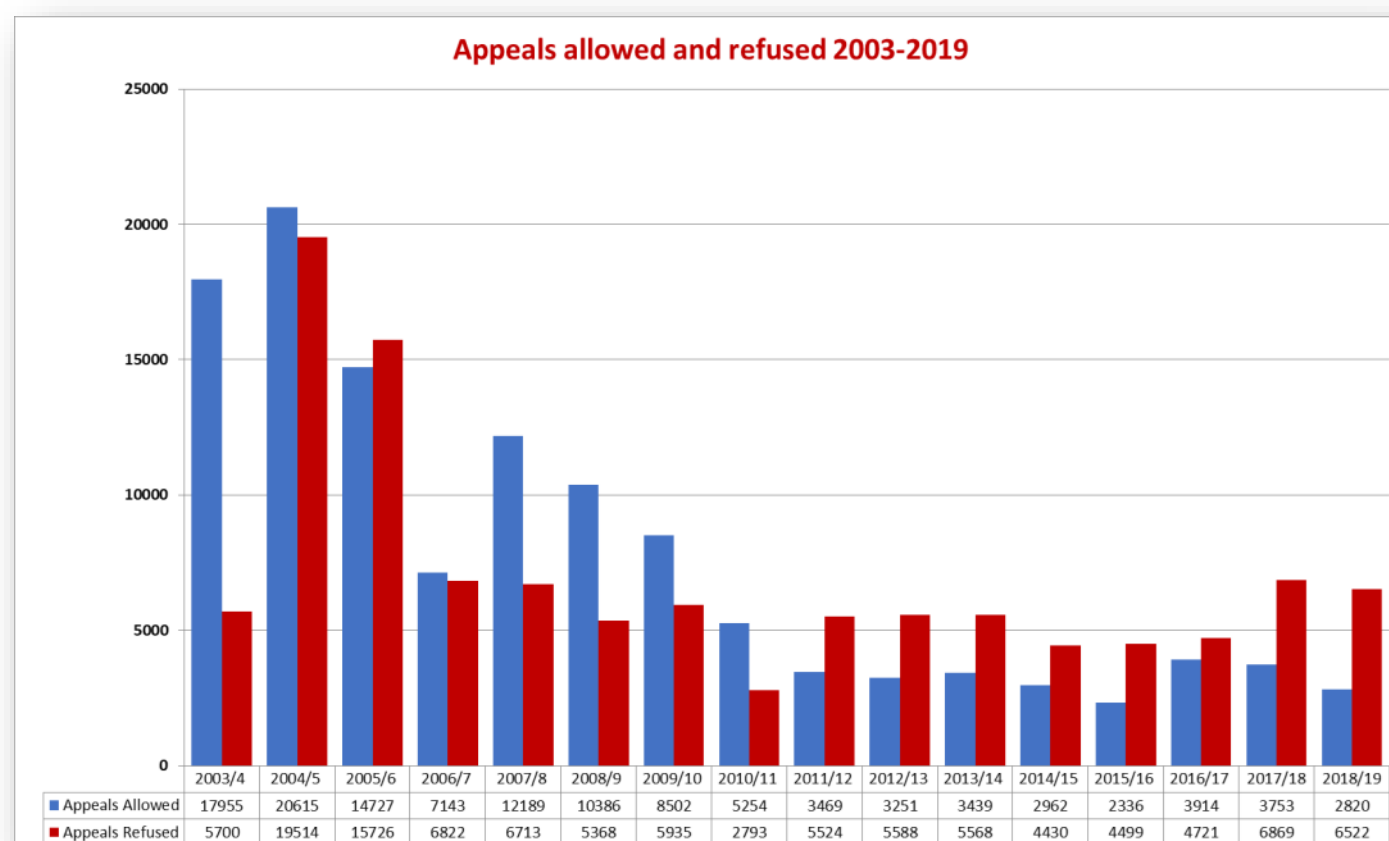
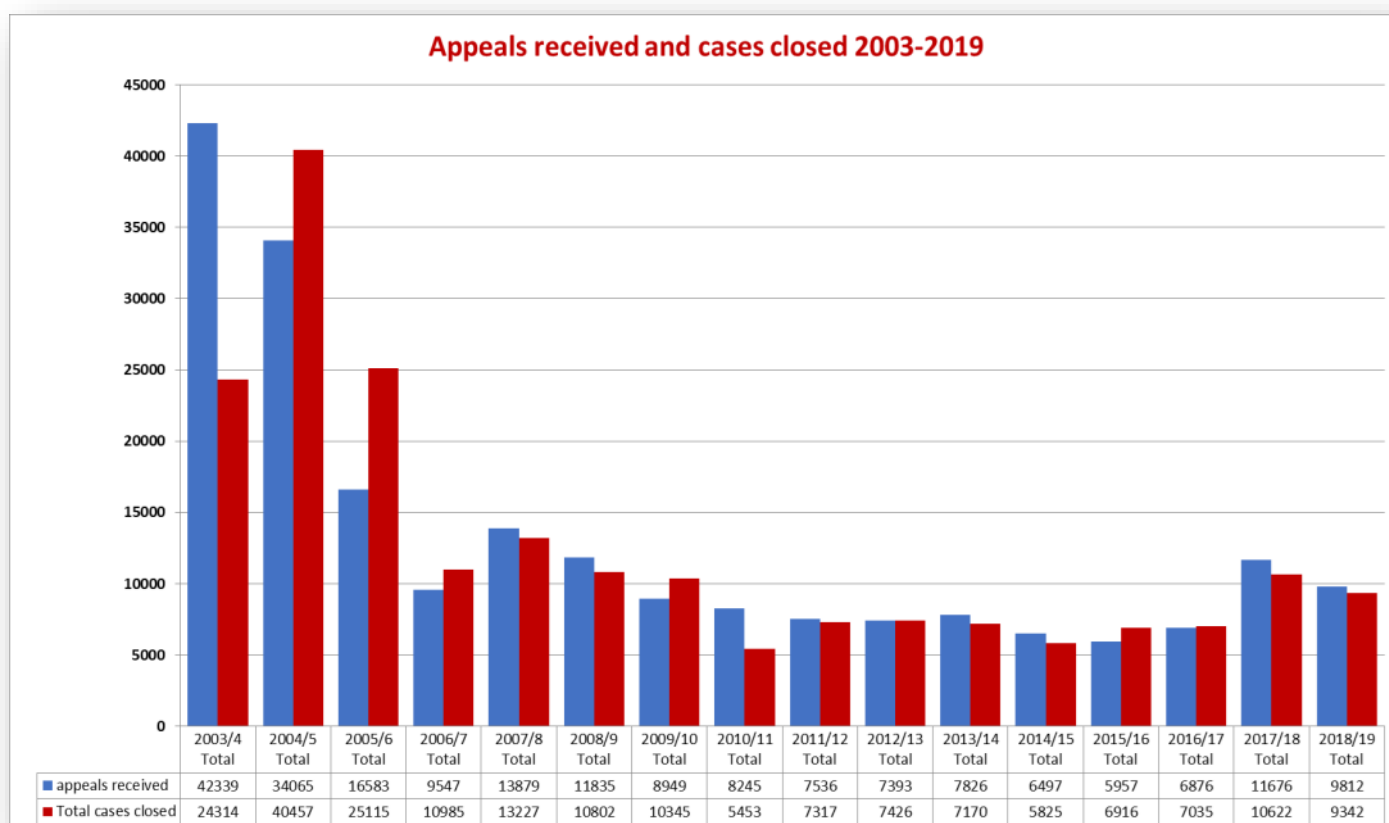
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2017-18

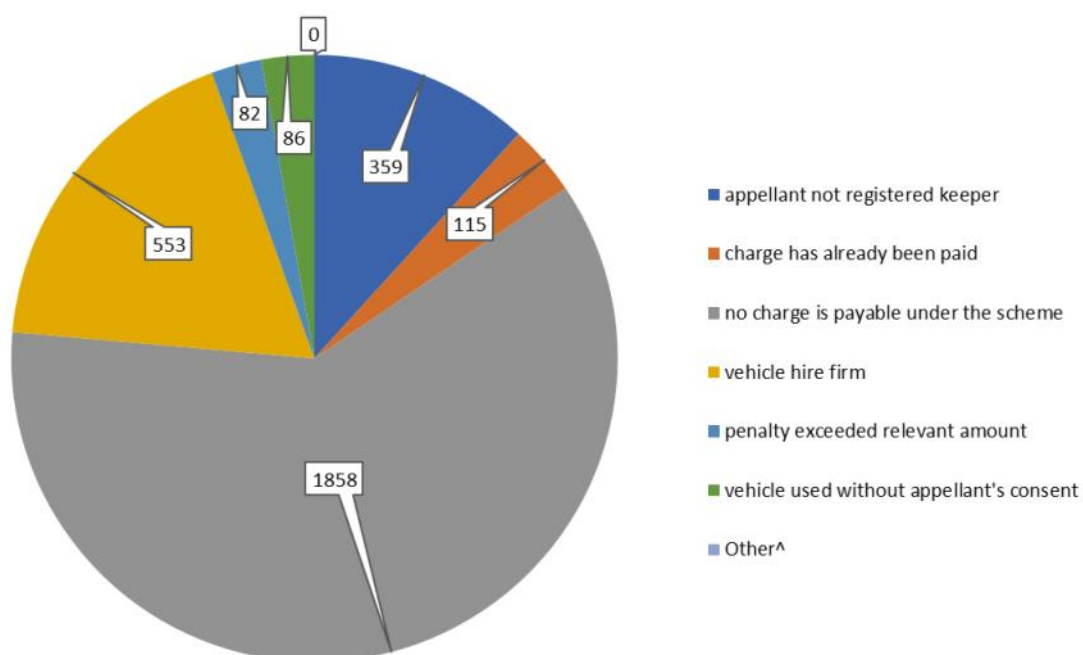


Appendix 1 — Appeals 2003—2019

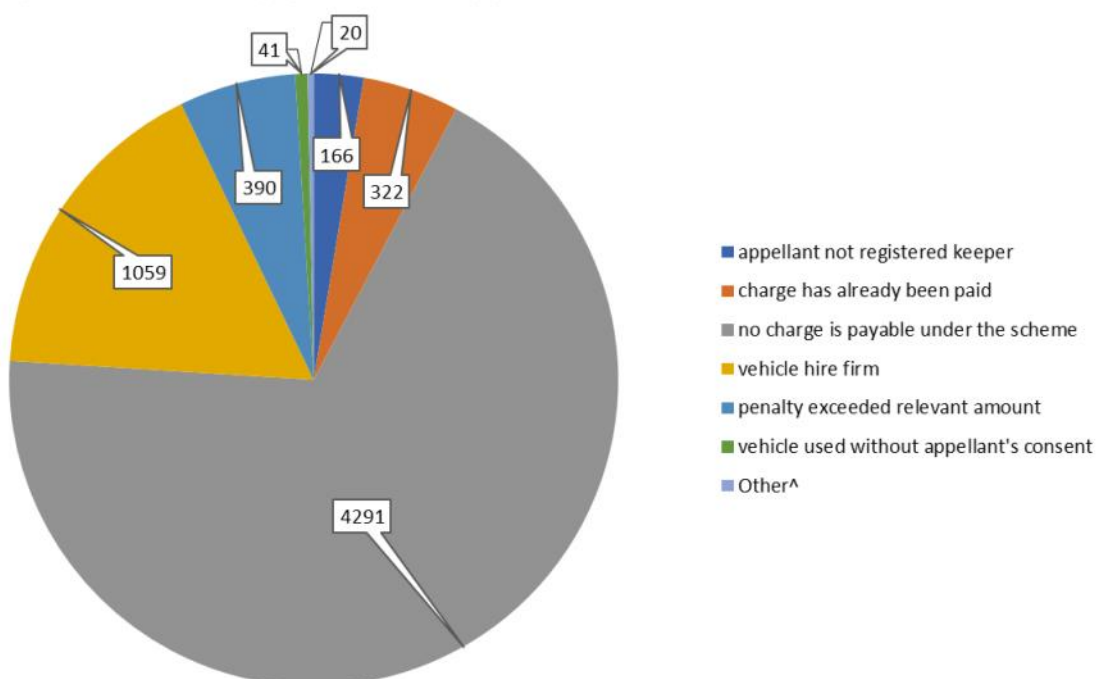


Appendix 2 - Appeal decisions (by ground) 2018-19

Summary of decisions by ground of appeal (allowed) 2018/19



Summary of decisions by ground of appeal (refused) 2018/19



Appendix 3 - Congestion charging statistics 2014-19

(see previous reports for figures prior to 2014)

	2014/15	2015/16	2016/17	2017/18	2018/19
Appeals received	6497	5957	6876	11676	9812
Total cases closed	5825	6916	7035	10622	9342
Appeals withdrawn by appellants	188	205	174	132	235
Appeals not contested by TfL	1382	1066	1496	2738	1756
Appeals refused postal	3255	3560	3258	4572	4326
Appeals allowed postal*	1117	1199	1797	3152	1703
Appeals refused personal	987	734	1289	2297	2196
Appeals allowed personal*	463	71	621	601	1117
Closed administratively	3	81	70	0	0
Appeals adjourned	129	146	139	326	237
Review decisions	114	74	64	269	311
Costs decisions	73	24	4	9	25
Postal cases ready for adjudication at end of year	591	956	824	791	427
Personal hearings scheduled	922	508	705	629	606
% Withdrawn by appellants	3%	3%	2%	1%	3%
% Not contested by TfL	24%	15%	21%	26%	19%
% Refused postal	56%	51%	46%	43%	46%
% Allowed postal*	19%	17%	26%	30%	18%
% Refused personal	17%	11%	18%	22%	24%
% Allowed personal*	8%	1%	9%	6%	12%
% Closed administratively	0%	1%	1%	0%	0%
% of cases allowed	27%	34%	34%	35%	30%
Average postal hearing (mins) ^^	26	19	12	11	13
Average personal hearing (mins) ^^	31	27	22	14	25
% of cases 1st considered within 56 days	36%	n/a	n/a	n/a	n/a
Average days delay	n/a	54	55	53	56
% of hearings within 15 mins	79%	79%	84%	85%	85%

Summary of decisions by ground of appeal (allowed)	2014/15	2015/16	2016/17	2017/18	2018/19
Appellant not registered keeper	59	326	352	273	359
Charge has already been paid	7	52	106	308	115
No charge is payable under the scheme	133	535	1408	2306	1858
Vehicle hire firm	15	283	418	711	553
Penalty exceeded relevant amount	10	47	93	125	82
Vehicle used without appellant's consent	13	23	33	29	86
Other^		4	8	1	0

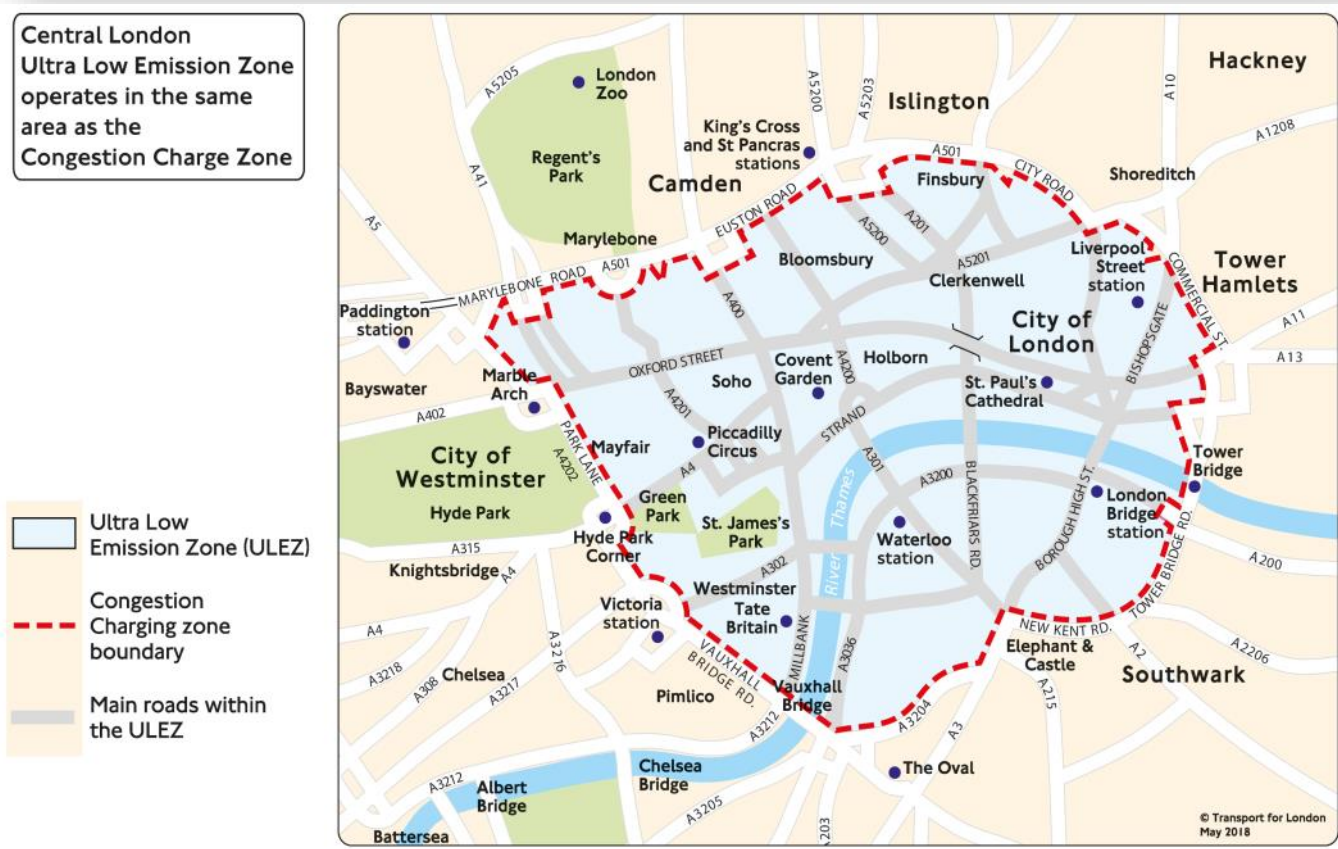
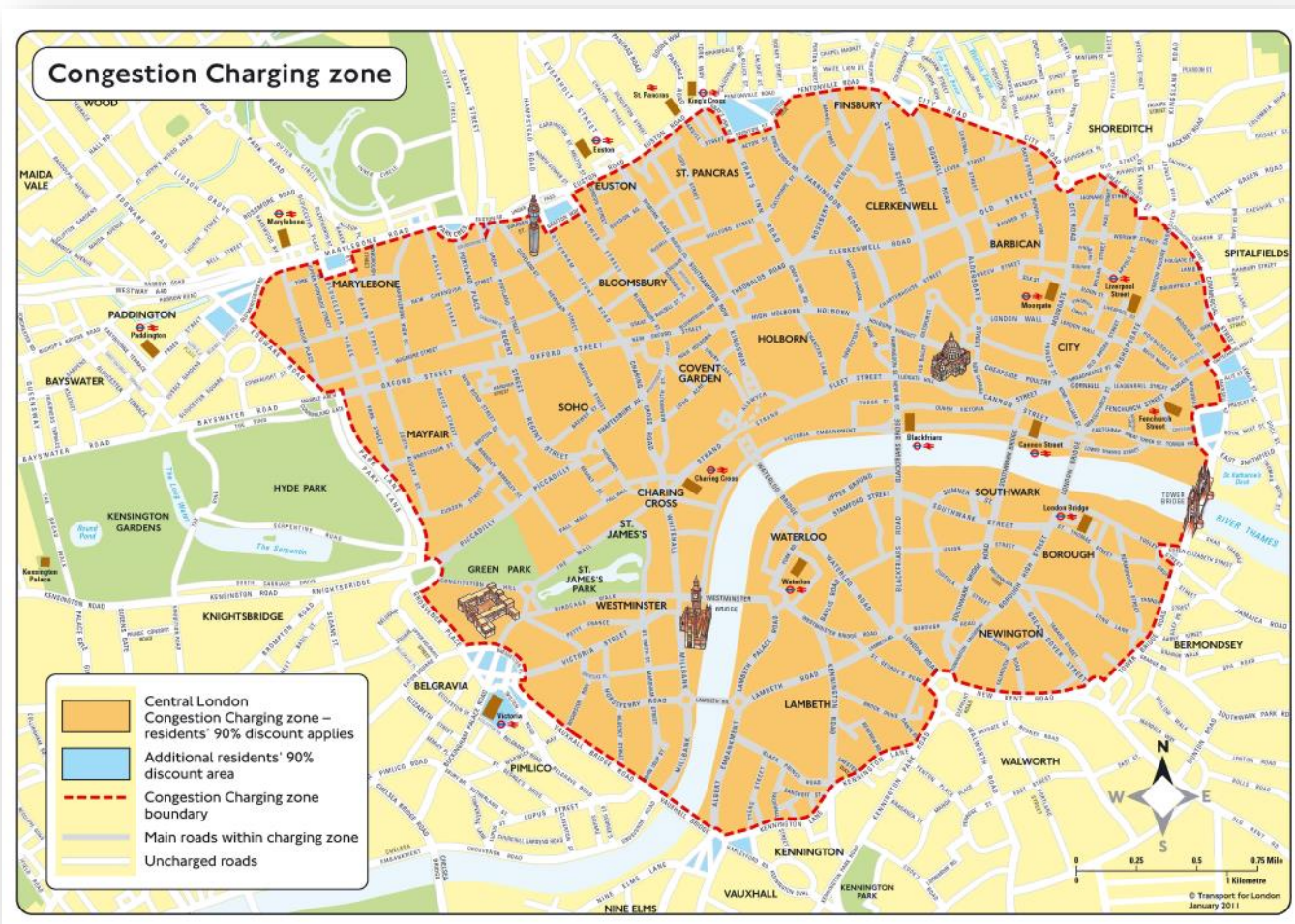
Summary of decisions by ground of appeal (refused)	2014/15	2015/16	2016/17	2017/18	2018/19
Appellant not registered keeper	240	208	183	130	166
Charge has already been paid	319	291	201	299	322
No charge is payable under the scheme	2009	2364	2949	4416	4291
Vehicle hire firm	656	792	827	1407	1059
Penalty exceeded relevant amount	688	590	316	490	390
Vehicle used without appellant's consent	42	36	44	60	41
Other^		13	27	67	20

* 2015/16 figures exclude DNCs.

^ Cases where the ground of appeal is not recorded

^^ The way in which this time is recorded changed in 2015/16

Appendix 4 - Congestion Charge and Ultra Low Emission Zone maps





Useful addresses

Office for Judicial Complaints

10th Floor Tower 10.52

102 Petty France

London

SW1H 9AJ

Telephone: +44-(0) 203 334 2555

Fax: +44-(0) 203 334 2541

E-mail: customer@ojc.gsi.gov.uk

Website: <http://judicialcomplaints.judiciary.gov.uk/>

Office of the Judicial Appointments and Conduct Ombudsman

9.53, 9th Floor Tower

102 Petty France

London

SW1H 9AJ

Website: <http://www.justice.gov.uk/about/jaco.htm>



**Road User Charging Adjudicators (RUCA)
London Tribunals
PO Box 10598
Nottingham
NG6 6DR**

Telephone: +44-(0) 207 520 7200
*(Monday to Thursday 8.00 am to 6.30 pm, Friday 8.00 am to 6.00 pm and
Saturday 8.30 am to 2 pm, excluding bank holidays)*

**e-mail: queries@londontribunals.org.uk
Website: <http://londontribunals.gov.uk/>**

**Hearing Centre at:
Chancery Exchange (Ground Floor)
10 Fumival Street,
London
EC4A 1YH**