

Audit and Governance Committee



25 September 2025

Title	Traffic Regulation Orders - update
Purpose of the report	To make a decision
Report status	Public report
Report author	Michael Graham, Monitoring Officer
Lead Councillor	Cllr Liz Terry, Leader of the Council
Corporate priority	Not applicable, but still requires a decision
Recommendations	<p>That Audit and Committee:</p> <ol style="list-style-type: none">1. Notes the progress made by officers to address the issues reported to Council on 15 October 2024, and ongoing actions2. Notes the progress made on the Action Plan at Appendix 23. Resolves to close the Restitution Scheme4. Resolves to add the outstanding actions on the Action Plan to the Committee's Audit Tracker5. Notes that further claims which would have been allowable under the Restitution Scheme can still be made directly by motorists to Parking Services and will still be payable if they meet the published conditions

1. Executive Summary

- 1.1. On 15 October 2024, a report was presented to Council about irregularities in relation to certain historic Traffic Regulation Orders (TROs). As part of that report, an Action Plan was agreed by Council. This Committee has been delegated authority to receive reports about the implementation of that Action Plan and to monitor its effectiveness.
- 1.2. An update was brought to Audit and Governance Committee in January 2025 and then again on 9 April 2025 where it was agreed:
 - That the Executive Director of Economic Growth and Neighbourhood Services update the management response to the APSE report to address the recommendations regarding the Traffic Management Sub-Committee;
 - That, at its next meeting, the Committee consider setting a deadline for closing the formal Restitution Scheme and the Committee's monitoring of the Action Plan.
- 1.3. In October 2024, Council also delegated authority to the Audit and Governance Committee to decide when to close the Restitution Scheme. This is now being recommended, and the reasons why are explained in this report.

2. Policy Context

- 2.1. The Council has approximately 240 TROs that enforce various highway restrictions in the Borough.

2.2. The Road Traffic Regulation Act 1984 (RTRA) sets out the legal basis for making TROs. It gives local authorities the power to make TROs to regulate or restrict traffic as needed for:

- (a) avoiding danger to persons or other traffic using the road or any other road or for preventing the likelihood of any such danger arising, or
- (b) preventing damage to the road or to any building on or near the road, or
- (c) facilitating the passage on the road or any other road of any class of traffic (including pedestrians), or
- (d) preventing the use of the road by vehicular traffic of a kind which, or its use by vehicular traffic in a manner which, is unsuitable having regard to the existing character of the road or adjoining property, or
- (e) preserving the character of the road in a case where it is especially suitable for use by persons on horseback or on foot, or
- (f) preserving or improving the amenities of the area through which the road runs, or
- (g) any of the purposes specified in paragraphs (a) to (c) of subsection (1) of section 87 of the Environment Act 1995

2.3. The Council Plan (2025/2028) theme of *Deliver a sustainable and healthy environment and reduce Reading's carbon footprint* aligns closely with the provisions of the Road Traffic Regulation Act 1984 (RTRA), as both seek to improve public wellbeing and sustainable development.

2.4. In addition, the Council has recently agreed its Local Transport Plan 2024 – 2040, which sets out an ambitious vision to create healthier, greener and more equal communities through the future provision of travel options in Reading. The Strategy is focused on promoting sustainable transport options as a realistic alternative to the private car, setting out how transport facilities and services in Reading will be developed to 2040 to help achieve our wider objectives for the town, including the Reading 2050 Vision and the objectives of the Climate Emergency Strategy. TROs which address the issues (a) – (g) above have an important part to play in the delivery of this Transport Plan.

3. Update on Action Plan

Appendix 1 contains the original Action Plan approved by Council on 15 October 2024.

Appendix 2 Provides a summary of progress in implementing the Action Plan with RAG ratings applied. Further detail on some of the key activities is outlined below. The six headings below mirror the Action Plan headings.

Resourcing Restitution

3.1. Council approved the scheme of restitution on 5 October 2024, and the website went live on 15 October 2024 with claims being submitted from 16 October 2024. The go live was accompanied by press and communications to draw as much attention as possible to the opportunity to submit a claim.

3.2. A priority for the Council was to directly contact those individuals who were subject to enforcement action. A total of 147 cases had been referred to Enforcement Agents (formerly known as Bailiffs). Each of the individuals or businesses were written to in October 2024. Of these, 63 responded and have been fully refunded.

3.3. Officers put in place arrangements to attempt to trace the remaining individuals through credit reference agencies, such as Experian. The Enforcement Agents have now successfully located 69 of the 147 and made restitution. The remaining individuals have either not responded or cannot be traced. This element of the plan is now complete.

3.4. The metrics show that; 1,141 claims related to PCNs have been submitted to date. Of those (at the time of preparing this report) a total of 714 have been approved for refund. In total across both Enforcement agents and PCN cases £68k has been refunded as at the end August 2025 including Time and Trouble and interest payments.

PCN Metrics	No.
Claims Made	1,141
Claims resulting in refund	528
Claims pending refund – awaiting bank details	186
Total claims approved for refund	714
Claims not approved for refund – awaiting further information	131
Claims rejected	296
Enforcement Case Metrics (cases that went to bailiff)	No.
Total claims	69
Total approved	69
Paid	69
Rejected	0

Month	No. Enf. Claims	No. PCN Claims
October 2024	44	89
November 2024	15	70
December 2024	4	326
January 2025	3	396
February 2025	2	90
March 2025	1	31
April 2025	0	22
May 2025	0	12
June 2025	0	12
July 2025	0	14
August 2025	0	13

(Note this table includes 3 test cases not counting towards the total)

3.5. The Council has taken further proactive action and written to 2,235 customers who were subject to a Penalty Charge Notice (PCN) but not enforcement action. This involved contact to recent customers where we had contact details on file. The Council has now interrogated all data held by it and carried out searches through credit reference agencies to locate other claimants. There are no further databases we can search and therefore no further proactive enquiries can be made to search for possible claimants.

3.6. All temporary staff who were employed to deal with the initial rush of claims (and expected claims) have now been let go. Any remaining claims that do come in, and the ongoing work to seek additional information and verify payment details of the claims

shown in the tables above, are now managed with existing resources in Parking Services. Any new claims that now emerge can be dealt with by existing resources.

3.7. Prior to the reintroduction of live enforcement, warning notices were issued for a period of 2 weeks. Since the commencement of enforcement on the affected Red Routes, and parking bays, there have been 1161 PCN issued.

Communications

3.8. Communications activity carried out to date highlighting residents' ability to make a claim is set out below.

3.9. Press release issued with media interviews with BBC South, ITV Meridian, Reading Chronicle and Greatest Hits Radio – 7 October 2024

Communication	Channel	Date
Media Interviews	BBC South, ITC, Reading Chronicle, Radio	7 Oct 24
Social Media	Next Door, Facebook, X	8 Oct 24
Residents Newsletter	Email with details of scheme and how to claim	16 Oct 24
Internal RBC Communications	Email	7,10,16 Oct 2024
Berkshire Councils media	Berkshire councils and South Oxfordshire and Vale of White Horse District Councils	29 Oct 24
<i>Direct correspondence</i>	<i>Enforcement Agents wrote to all eligible claimants where addresses were held offering a refund.</i>	<i>October 2024</i>
Residents Newsletter	Email with details of scheme and how to claim	7 Nov 24
Paid for media campaign	Facebook users within 50km (2 weeks)	13 Nov 24
Residents Newsletter	Email with details of scheme and how to claim	28 Nov 24
<i>Direct correspondence</i>	<i>Enforcement Agents carried out credit searches on those subject to enforcement who had not responded to letter in October. A second letter was sent where addresses were assessed to be current. 15 were considered likely to be at the same address. There were no further responses.</i>	<i>December 24</i>
Paid for media campaign	Paid for social media campaign for users in 50km area – 14 January - 31 January which received more than 85,000 views and 1,280 clicks through to the webpage.	14-31 Jan 25
Berkshire Councils media	Reminder to Berkshire councils and South Oxfordshire and Vale of White Horse District Councils to share content	14 Jan 25
Press Release	Scheme reminder which was published in the Reading Chronicle, Reading Today, BBC South Online and Greatest Hits Radio.	15 Jan 25
Social Media	A social media message with a link to the appropriate Council webpage has been pinned at the top of the Council's X/Twitter account since October 2024 and remains there now.	Ongoing

- 3.10. A number of, but not all, the communication activities above have resulted in small peaks in traffic to the website and claim activity. Following the update report to this Committee in April 2025 further articles were generated in the Reading Chronicle and Reading Today. Articles have also been published by Reading Chronicle and BBC Berkshire in response to the Traffic Management Sub-Committee in September 2025 which updated councillors about the TRO rectification programme (see below). The issue has therefore been in the public domain with sufficient attention for almost a year.
- 3.11. Mindful of the need to advise Audit and Governance Committee on the eventual closure of the Scheme, it seems that we have now reached the point where officers can recommend the current scheme can safely close. This is discussed further below.

Remaking of Traffic Regulation Orders

- 3.12. Officers have completed a detailed review of the restrictions and measurements to be included in the new draft TROs, alongside conducting a review of the TRO Articles, considering the issues discovered with the TRO, as identified in the October 2024 report to Council.
- 3.13. Statutory processes have now been undertaken and have resulted in new or amended TROs being put in place for all of the items reported in the October 2024 meeting.
- 3.14. Progress has been reported to the Lead Councillor, Chair of Traffic Management Sub-Committee and Ward Councillors. Additionally, the first in a series of update reports was noted at Traffic Management Sub-Committee (TMSC) in November 2024. Further reports have been taken to each subsequent meeting of TMSC up to, and including, September 2025.
- 3.15. The following table reports the dates at which the TROs came into effect and when enforcement commenced:

Item	Progress (Indicative Key Milestones. Subject to Change)
TRO 1 (Red Route East)	TRO made and came into effect on 3 February 2025. Enforcement, following warning notices, commenced from 2 March 2025.
TRO 2 (Swainstone / Waldeck)	TRO made and came into effect on 24 April 2025. Enforcement, following warning notices, commenced from 15 May 2025.
TRO 3	Not Applicable.
TRO 4 (Red Route West)	TRO amended by statutory notice and made on 4 September 2025. Enforceability was not impacted by the identified issue and had not ceased.
TRO 5 (Southcote Verge & Footway)	TRO made and came into effect on 28 April 2025. Enforcement, following warning notices, commenced from 15 May 2025.
TRO 6 (Tilehurst & Kentwood Verge & Footway)	TRO made and came into effect on 28 April 2025. Enforcement, following warning notices, commenced from 15 May 2025.
TRO 7 (London Road)	TRO made and came into effect on 2 June 2025. Enforcement, following warning notices, commenced from 17 June 2025.

Item	Progress (Indicative Key Milestones. Subject to Change)
TRO 8 (Hosier Street & St Marys Butts)	TRO made and came into effect on 28 April 2025. Enforcement, following warning notices, commenced from 15 May 2025.
TRO 9 (A33 bus lanes)	TRO made and came into effect on 28 April 2025. Enforcement, following warning notices, commenced from 15 May 2025.
TRO 10 (Redlands Road)	TRO made and came into effect on 28 April 2025. Enforcement, following warning notices, commenced from 15 May 2025.

- 3.16. Enforcement recommenced at least two weeks after the making of each TRO, following an initial period of issuing warning notices. This is with the exception of TRO 4, where the validity and enforceability of the TRO was not considered to be compromised by the issue identified.
- 3.17. Enforcement activity has returned to normal levels witnessed before the suspension of enforcement; there are no other notable patterns to report upon resuming enforcement.

Future Assurance

- 3.18. A system has been put in place between Network Services, Parking Enforcement and Legal Services to review new TROs and monitor any issues that arise that may affect enforcement of existing TROs in order to put in place appropriate actions.
- 3.19. Through this process, further issues have been identified. These have been reported through the 'TRO Rectification Update' reports at TMSC. Officers have been transparent about the identified issue, and, where applicable, enforcement activities have been suspended at the point where the issue came to light.
- 3.20. Where remedy has required new or amended TROs to be proposed through statutory consultation, progress on these processes has been reported to TMSC.
- 3.21. At the time of writing, two additional issues are progressing: the Town Centre Red Route (TRO Article issues involving typos) amendment order has been consulted and is in the process of being made. The statutory consultation amending the London Street southbound bus lane (TRO schedule and signing mismatch) is underway, and any objections will be considered by TMSC in November 2025.
- 3.22. All draft TROs are now circulated to Parking Services for comment and for their input into the Articles. The proposed site is walked by officers to compare the TRO with the actual restrictions. Any contradictions or omissions are noted and passed back to the Service delivering the TRO for amendment.
- 3.23. A new 'Digital TRO' project has been initiated and is underway. This project seeks to implement a map-based TRO management system that will not only improve the availability, ease of reference and consistency of Highway TROs, but will provide a significant risk mitigation against future TRO inaccuracies. The starting point for this new system is expected to be the creation of three themed Boroughwide TROs, covering all waiting restrictions, moving traffic restrictions and speed limits respectively, with comprehensive overarching TRO Articles applying to each.
- 3.24. This is a substantial project, for which it is expected that the waiting restriction TRO will take circa 18 months to introduce, with moving traffic and speed limit restrictions to follow as smaller packages.
- 3.25. Following a procurement exercise, the software provider has been appointed, and it is anticipated that the initial on-street surveys of all restrictions will commence before

October 2025. As these initial stages of the project progress, officers will be able to map out projected activity timelines with greater confidence and intend to provide updates to TMSC.

Governance Arrangements

- 3.26. One of the issues identified in the report to Council was the lack of opportunity to discover these mistakes at an earlier point as there was no report back to TMSC about implementation of the Councillors' previous decisions and the proper implementation of the same. Whilst this might not have caught all the errors identified in the Audit report, it would certainly have helped to tighten up these procedures. Two matters have now been instigated as a result:
- 3.27. Firstly, Committee Services have undertaken a review of Delegated Decisions since October 2022 (when the Constitution changed, and officer delegations were rationalised). As a result of this, further work is taking place and will be ongoing as part of business as usual, to ensure that Officer Decision Notices (ODN) are completed where expected and filed in the appropriate Council system.
- 3.28. Secondly, a new Agenda item will be placed on all Committees to follow up previous decisions. Where a Committee makes a specific delegation to an Officer this will be reported to the next Committee, so that councillors can see when the appropriate ODN has been made (or if it is still pending). Where no ODN is published, councillors will be able to question Officers and follow up. The Monitoring Officer will keep this new system under review to ensure it achieves its objectives.

Review of TRO process and Team Capacity

- 3.29. In line with the Action Plan, in November 2024 the Council commissioned a review of structures, processes and working practices across those teams involved in the preparation and execution of Traffic Regulation Orders. APSE (Association for Public Service Excellence) was appointed to carry out the review.
- 3.30. This report and the management response was considered at your April 2025 Committee.
- 3.31. At your committee on 9 April 2025 it was agreed:
 - That the Executive Director of Economic Growth and Neighbourhood Services update the management response to the APSE report to address the recommendations regarding the Traffic Management Sub-Committee;
- 3.32. Since that time the Executive Director has discussed with the Council leadership the remit and process for resident and Sub-Committee requests being presented to TMSC. Officers are working on a new triage process which will be presented to TMSC. This should address the Audit and Governance Committee's view that local matters should be heard at TM Sub whilst not creating unrealistic expectations for residents which may not be resourced for delivery.
- 3.33. At your April meeting it was also reported that the Government was consulting on a requirement to digitise all new and temporary (but not existing) TROs to be provided to the Department for Transport in a digital format for use within a central database. The consultation considered implementation of the new requirement in either July or October 2025. Officers responded to that consultation and in summary indicated, that this would be insufficient time to procure and implement a solution. At the time of writing a date has not been set by Government for implementation.

Support for staff

- 3.34. It is recognised that although the Council has many existing ways in which staff can speak up if they are aware of errors, poor practice or improvements that could be made, more can be done to publicise these channels. A 'Speaking Up' campaign was

launched in late March 2025 to bring together all of the various ways in which concerns can be raised. These channels include formal channels such as the whistleblowing process and via formal HR casework/trades unions as well as informal channels such as 1:1s and via staff groups. Please note that this campaign fully addresses the relevant recommendations recently set out by the Chair of the Committee on Standards in Public Life in the report '[Recognising and Responding to Early Warning Signs in Public Sector Bodies](#)' which is designed to support public leaders to reflect on how they can best equip staff to identify and resolve problems or issues that might get in the way of delivering the core purpose of an organisation). Whilst it is difficult to track the impact of the campaign (given it focuses on encouraging staff to speak up via existing – rather than new – channels, it is certainly the case that the whistleblowing and HR casework channels have seen an increase in volumes following the launch of the Speaking Up campaign. Regular reminders about the value of Speaking up are included in staff newsletters.

Continuity of the Restitution Scheme

- 3.35. Given the low numbers of new referrals into the scheme and the work which has been done so far to publicise the ability to claim refunds, it is now proposed to discontinue the scheme. This should not diminish the ability of any member of the public to claim a refund for an historic PCN if they have not already done so. Existing claims which are awaiting further information, or verified claims which are awaiting payment details will be honoured. So to that extent, the Parking Services element of the plan will continue as a business as usual activity.
- 3.36. Reports on the Digital TRO process will be submitted routinely to TMSC as part and parcel of agreeing the new Orders, maps, articles etc which will be necessary for the Project. This means that the ongoing work of improving all of the Council's TROs will still be visible to councillors and the public.
- 3.37. The Action Plan at **Appendix 2** is now substantially complete and significant progress against the plan can be evidenced since it was first published (as Appendix 1) in October 2024.
- 3.38. There are two future matters on the Action Plan which can be added to the Committee's Audit Tracker to ensure they are reviewed in the future:
 - Following the APSE report it was envisaged that there would be a further follow up Audit which was scheduled for Q2 25/26. This is in hand. The outcome will be reported through the usual mechanisms to Audit and Governance Committee quarterly updates of the Chief Internal Auditor.
 - A wider review of the Council's systems against the CIPFA / SOLACE Code of Corporate Governance was recommended. This was last reviewed in 2021/22. The timing of this is a matter for the Committee to determine.
- 3.39. In conclusion, as
 - the Action Plan is now broadly complete
 - monitoring at TMSC and Audit and Governance has been effective
 - remaining actions can be overseen by Audit and Governance, and
 - there is no prejudice to the rights of residents and motorists to claim historic PCNsit is now proposed that the Restitution Scheme is closed.

4. Contribution to Strategic Aims

- 4.1. The Council Plan has established five priorities for the years 2025/28. These priorities are:

- Promote more equal communities in Reading
- Secure Reading's economic and cultural success
- Deliver a sustainable and healthy environment and reduce our carbon footprint
- Safeguard and support the health and wellbeing of Reading's adults and children
- Ensure Reading Borough Council is fit for the future

4.2. In delivering these priorities, we will be guided by the following set of principles:

- Putting residents first
- Building on strong foundations
- Recognising, respecting, and nurturing all our diverse communities
- Involving, collaborating, and empowering residents
- Being proudly ambitious for Reading

4.3. Full details of the Council Plan and the projects which will deliver these priorities are published on the Council's website - [Council plan - Reading Borough Council](#). These priorities and the Council Plan demonstrate how the Council meets its legal obligation to be efficient, effective and economical.

4.4. The recommendations in this report align with the Council's values and objectives in the Council Plan, namely:

Deliver a sustainable and healthy environment and reduce our carbon footprint

4.5. The Road Traffic Regulation Act enables the Council to introduce measures like speed limits, low-emission zones, or restrictions on certain vehicles. These provisions directly support reducing pollution, improving air quality and creating spaces where people feel the benefits of clean air and active travel like walking and cycling. By implementing TROs, the Council can create more green spaces and pedestrian friendly areas, aligning with its goal of promoting a healthy environment which has a positive impact on the life of every resident – making Reading a greener, more attractive place to live, with a tangible impact on physical and mental health and life expectancy.

4.6. TROs can enhance road safety through measures like traffic calming, safer pedestrian crossings, or reduced speed limits, making neighbourhoods safer and more liveable. This fosters a sense of connectivity in communities. These actions also support accessibility and mobility, which are key to thriving, connected communities, ensuring everyone including the vulnerable and excluded can safely use public spaces, regardless of age or ability.

Secure Reading's economic and cultural success

4.7. By managing traffic to reduce congestion and improve public transport flow, the Council can boost local economic activities and make it easier for everyone to access education, skills and training and good jobs.

Ensure Reading Borough Council is fit for the future

4.8. Our approach to the scheme of restitution demonstrates strong use of digital first, creating an online route to claims which was easy to use and allowed the Council to track metrics on key data points. We also maintained an in-person option so as to be accessible to those who needed support with the claims process. The work towards procurement of a replacement digital approach to TRO will also enable digital improvements to process.

5. Environmental and Climate Implications

- 5.1. The Council declared a Climate Emergency at its meeting on 26 February 2019 (Minute 48 refers).
- 5.2. A climate impact assessment has not been considered necessary for this report. The TRO rectification and associated climate considerations are described in reports to Traffic Management Sub Committee. In general, the link between poor air quality, the

climate emergency and emissions from vehicles is well documented and evidenced. Effective control and management of car parking can have a positive impact in reducing the effects of transport on the environment. A robust process for setting out restrictions and allowing for effective enforcement is therefore essential.

6. Community Engagement

- 6.1. Please see paragraph 3.7 for the community engagement undertaken to ensure there is public awareness of the Restitution Scheme.
- 6.2. For rectification of TRO, the draft TROs will be advertised in compliance with statutory regulations and an opportunity provided for objections to be made.

7. Equality Implications

- 7.1. Under the Equality Act 2010, Section 149, a public authority must, in the exercise of its functions, have due regard to the need to -
 - eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

- 7.2. An EqIA is not relevant for this update report. No impacts on the public sector equality duty have been identified.

8. Other Relevant Considerations

- 8.1. None to report.

9. Legal Implications

- 9.1. The legal implications relating to TROs and the discrepancies uncovered were reported in full to Council in October 2024. No further legal implications arise in this update report.

10. Financial Implications

- 10.1. As set out in the main body of this report, a grand total of £68k of claims have been paid to August 2025. These payments and future ones will be funded from earmarked reserves.

11. Timetable for Implementation

- 11.1. If councillors are minded to agree the recommendation, the Restitution Scheme will now close and further claims about historic claims will be handled as business as usual activity. Whilst the Council will no longer pro-actively promote the issue, this will not prevent valid claims being brought forward.

12. Background Papers

- 12.1. There are none.

Appendices

1. Original Action Plan as approved at Council on 15 October 2024
2. Updated Action Plan showing progress with RAG status