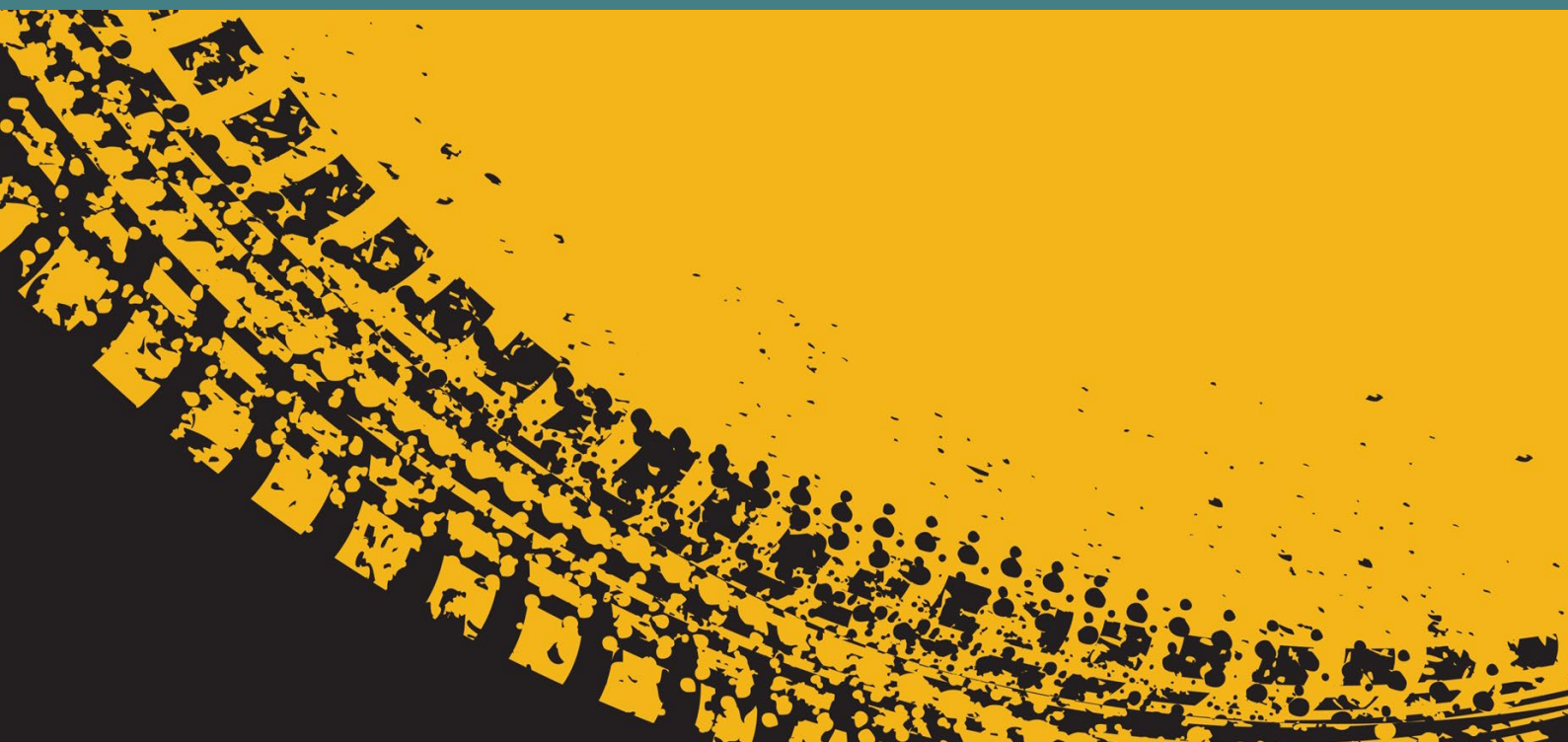




**Traffic Penalty
Tribunal**
England and Wales

Annual Report

2025–26



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Background

The Traffic Penalty Tribunal (TPT) decides motorists' appeals against penalty charge notices (PCNs), issued by local authorities and charging authorities in England (outside London) and Wales, for traffic contraventions.

This includes appeals against PCNs issued by over 300 local authorities in England and Wales for **parking, bus lane** and **moving traffic** contraventions, as well as for **clean air zones** and **littering from vehicles** (England only).

The TPT also decides appeals against penalties from other road user charging schemes in England, including the Dartford-Thurrock River Crossing (**'Dart Charge'**) and the Mersey Gateway and Silver Jubilee Bridge Crossings (**'Merseyflow'**).

Appeals to the TPT are decided by 21 part-time adjudicators, together with the Chief Adjudicator, Caroline Hamilton. All the adjudicators are independent, impartial lawyers, whose appointments are subject to the Lord Chancellor's consent. They are supported by a team of administrative staff.

The independent TPT is funded by a Joint Committee of the 300+ authorities that enforce the traffic restrictions: **Parking and Traffic Regulations Outside London (PATROL)**. These authorities are fulfilling a statutory requirement to make provision for independent adjudication against the civil penalties they issue.

- The TPT decides appeals against ~29,000 PCNs a year.
- Most appeals are completed fully online, with attendance hearings (via telephone or video) also available.
- Appellants unable to get online receive Assisted Digital support by phone, Live Chat or post.
- 25% of cases are completed in 7 days, with over 40% within 14 days.



Chief Adjudicator's Foreword

Caroline Hamilton

The independent adjudicators at the Traffic Penalty Tribunal are pleased to present their 2025–26 Annual Report to the PATROL Joint Committee, providing appeal outcome statistics, information and an insight into the adjudicators' work during the reporting year.

The adjudicators are independent, impartial office holders appointed under the terms of the *Traffic Management Act 2004* and the *Transport Act 2000* (for road user charging schemes) to determine appeals against civil fixed traffic penalties issued by authorities in England (outside London) and Wales.

Although it is a statutory requirement for adjudicators to present an annual report to the Joint Committee, the Tribunal is pleased to take the opportunity to promote a wider understanding of the appeal process and the work of the adjudicators. This not only supports open and transparent justice, with appeal statistics and annual reports all published on the Tribunal's website at tpt.gov.uk, but also aims to remove misunderstanding by sharing clear information on the appeal process and its legal requirements to all stakeholders.

Open access to our work also promotes public confidence in the Tribunal by providing motorists with a fuller understanding of the statutory fixed penalty scheme, representation and appeal process, and the remit of the independent adjudicators.

Gaining a better understanding of the law and its application is crucial in this jurisdiction, where motorists frequently incur civil penalties because of misinformation or error, rather than simply disregarding the regulations or restrictions. Motorists without a proper understanding of their obligations, or the process underpinning the enforcement of a civil penalty under a fixed penalty scheme, may be further disappointed by the outcome of an appeal – the limited nature of the appeal jurisdiction not being intuitive.

To further assist motorists in this respect, the Tribunal (with the support of the PATROL Joint Committee) launched the *Traff-iCase* key cases website, available at keycases.info. This site provides online access to all traffic tribunal adjudicator and Court determinations that clarify the law and illustrate motorists' rights and obligations in clear, straightforward terms, potentially reducing the number of unwitting contraventions and appeals without merit. A report on the *Traff-iCase* site, now in its second year, is available on Page 15.

The function of the impartial adjudicator determining an appeal is restricted to the assessment of the evidence submitted by the parties to the appeal, making findings of fact on that evidence and applying the law as it stands to those facts. Their power is similarly limited by the statutory provisions.

An adjudicator's obligation – further to the assessment of the facts – is to apply the law. They are impartial, have no discretion and cannot take mitigating circumstances into account. They are required to apply the law even if they may have sympathy with the facts as presented by a motorist or enforcement authority officer. This limitation can mean that their role is challenging, and that they receive unwarranted criticism for simply carrying out their function as required and defined by law.

With this report, the adjudicators welcome the opportunity of promoting open justice and increasing public understanding of our work.

Caroline Hamilton
April 2026



1. Workload

1.1 New schemes

This reporting year has seen increases in authorities enforcing across all penalty jurisdictions for which the Traffic Penalty Tribunal adjudicators decide appeals. This includes 30 new authorities implementing moving traffic enforcement powers, the launch of the Oxford Congestion Charge and more councils now enforcing littering from vehicles restrictions.

Parking



One additional council, Huntingdonshire District Council, commenced civil parking enforcement in the reporting year.

Parking PCNs are usually issued to vehicles by a civil enforcement officer. In certain, regulated circumstances, however, they may be issued by post and / or based on evidence from an approved camera device and automatic number plate recognition (ANPR); for example, outside schools or on Red Routes.

Moving traffic and bus lanes



Moving traffic enforcement has significantly extended in the reporting year with the following authority areas in England and Wales approved for, or commencing, enforcement: Bolton, Brighton & Hove, Bury, Calderdale, Cornwall, Devon, Dorset, Dudley, Hull, Kirklees, Knowsley, Leicestershire, Merthyr Tydfil, Milton Keynes, North Somerset, North Yorkshire, Nottinghamshire, Plymouth, Portsmouth, Sandwell, Sefton, Slough, Solihull, Southend-on-Sea, Stockport, Suffolk, Sunderland, Wiltshire, Wolverhampton and York.

Additionally, bus lane contraventions are now enforced by the county councils of East Sussex and West Sussex.

Enforcement and adjudication proceedings for parking, bus lane and moving traffic PCNs are governed by the *Civil Enforcement of Road Traffic Contraventions (Representations and Appeals) (England) Regulations 2022* (England) and the *Civil Enforcement of Road Traffic Contraventions (Representations and Appeals) (Wales) Regulations 2013* (Wales).

More information on these regulations and those for other civil traffic restrictions can be found on the *Traff-iCase* website at: keycases.info/legislation-and-regulations.



Road user charging schemes

The Tribunal determines appeals arising from PCNs issued to vehicles having failed to pay for use of several road user charging schemes outside London, including clean air zones. Enforcement and adjudication proceedings for road user charging schemes are governed by the *Road User Charging Schemes (Penalty Charges, Adjudication and Enforcement) (England) Regulations 2013*.

Dart Charge



Appeals relating to PCNs issued to vehicles having failed to pay the crossing charges that apply at the Queen Elizabeth II Bridge and through the Dartford Tunnels, which cross the River Thames between Dartford, Kent, and Thurrock, Essex. The charging authority and respondent to an appeal is the Secretary of State for Transport.

Merseyflow



Appeals relating to PCNs issued to vehicles having failed to pay the crossing charges that apply for travel across both the Mersey Gateway and Silver Jubilee Bridges, which cross the River Mersey between Runcorn and Widnes, Cheshire. The charging authority is Halton Borough Council.

Congestion charging schemes



- **Durham Road User Charge Zone:**
Appeals relating to non-payment for entry into the Durham City Centre Peninsula, where the charging authority is Durham County Council.
- **Oxford Congestion Charge:**
Appeals relating to non-payment for use of certain vehicles at six temporary locations in the city centre of Oxford, where the charging authority is Oxfordshire County Council.

Clean air zones

The adjudicators determine appeals from zones in Bath, Birmingham, Bradford, Bristol, Newcastle/Gateshead, Oxford (Zero Emission Zone), Portsmouth and Sheffield. There are four types of clean air zone:



A: Applying to buses, coaches, taxis and private hire vehicles (PHVs).

B: Applying to buses, coaches, taxis, PHVs and heavy goods vehicles (HGVs).

C: Applying to buses, coaches, taxis, PHVs, HGVs, vans and minibuses.

D: Applying to buses, coaches, taxis, PHVs, HGVs, vans and minibuses, as well as private cars (also an option to include motorcycles).

The schemes are self-declaratory, the responsibility resting with the motorist to check their vehicle's status to establish if a charge is due at: gov.uk/clean-air-zones.

Littering from vehicles



The Tribunal determines appeals relating to penalty notices issued under the *Littering From Vehicles Outside London (Keepers: Civil Penalties) Regulations 2018* (made under the *Environmental Protection Act 1990*). Enforcement and adjudication are governed by the Schedule to the *Road User Charging Schemes (Penalty Charges, Adjudication and Enforcement) (England) Regulations 2013*, as if each reference to charging authority were a reference to the litter authority.

A littering offence is committed when litter is thrown, dropped or otherwise deposited from a vehicle (whether or not by the vehicle's keeper). Penalties may be up to £500. Local authority areas currently enforcing are: Amber Valley, Bedford, Blackburn with Darwen, Bradford, Buckinghamshire, Hinckley and Bosworth, Canterbury, Charnwood, Cumberland, Dover, Dorset, Hartlepool, Leicester, Manchester, Mid Devon, Milton Keynes, Mole Valley, Newcastle, North West Leicester, South Gloucestershire, Stroud, Sunderland, Teignbridge, Telford & Wrekin, Wigan and Wychavon.

1.2 Appeal volumes and outcomes

Though this reporting year has seen a modest decrease in the overall number of appeals, there has been a significant increase in moving traffic enforcement as more local authorities adopt powers to enforce these restrictions using approved cameras.

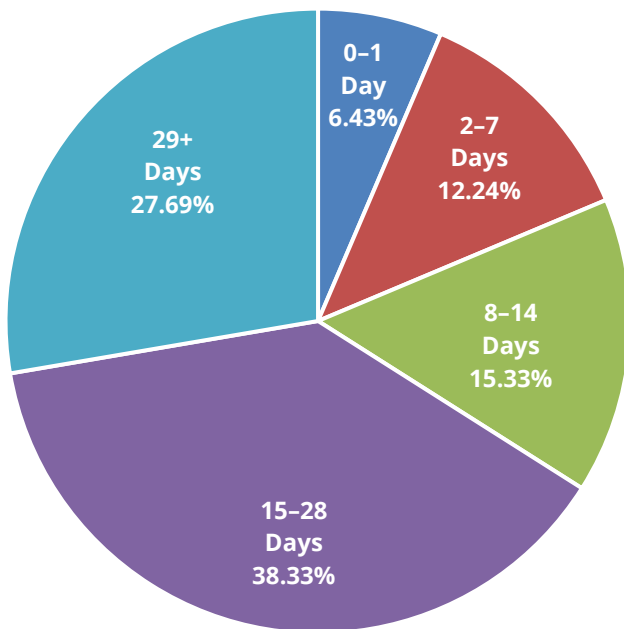
The number of clean air zone and road user charging appeals has decreased, however, reflecting motorists' growing knowledge of these schemes and likely familiarity with the signage and conditions in place (these signs are now included in the Department for Transport's *Know your traffic signs* publication at: gov.uk/government/publications/know-your-traffic-signs).

Total appeals, 2025–26 (previous year shown in brackets)

- Appeals registered by adjudicator: 24,357 (24,825)
- Statutory Declarations / Witness Statements: 3,468 (3,555)
- Appeals determined: 21,514 (21,780)
- Appeals allowed: 7,152 (7,789), of which 4,831 (5,465) were not contested
- Appeals refused: 10,029 (8,570), of which 337 (245) were withdrawn

TOTAL: 27,825 (28,300)

**Chart: Case closure at the Tribunal 2025-26
(% of cases against number of days open)**



- 0-1 Day
- 2-7 Days
- 8-14 Days
- 15-28 Days
- 29+ Days

A note on the data

The statistics in this section of the report detail the number of appeals received, registered and determined at the Tribunal.

Please note: Some appeals will have been registered before the reporting period began (1 April 2025) but determined in the reporting year; others will have been registered in the reporting year but not yet determined when the report was prepared.

Some registered appeals contain multiple linked PCNs; for example, for bridge crossings or other road user charging schemes involving multiple journeys. Each of these PCNs are separately appealed and determined, with some cases including both allowed and dismissed PCNs. This can create a perceived discrepancy in registration and outcome figures, which are presented by case.

Finally, the Tribunal strives to determine appeals efficiently and does not have a backlog of cases. Delays may arise, however, when settlement offers are made by a respondent with a view to disposing of a matter by Consent Order (see following page).

Appeals process

A statutory right of appeal only arises when the requirements of Part 2 of Schedule 1 to *The Civil Enforcement of Road Traffic Contraventions (Representations and Appeals) (England) Regulations 2022* (the '2022 Appeals Regulations') or Part 2 of *The Road User Charging Schemes (Penalty Charges, Adjudication and Enforcement) (England) Regulations 2013* (the '2013 RUC Regulations') – applying to littering from vehicles, as well as road user charging – are met. In Wales, *The Civil Enforcement of Road Traffic Contraventions (Representations and Appeals) (Wales) Regulations 2013* (the '2013 Welsh Regulations') apply.

Appeals made at the wrong time, from the wrong person or without adequate information may be rejected. In 2025–26, **1,367** (1,339 previous year) **appeals were received at the Tribunal, which due to a deficiency, were not registered** by the Proper Officer or independent adjudicator. If an appeal is rejected, the prospective appellant is provided with reasons, allowing them to correct any failures or provide further information allowing the registration of the appeal to be re-assessed.

The registration of an appeal is an ongoing period of review for the respondent authorities.

Some appeals are submitted with supporting evidence not provided to the authority at the representation stage (e.g. evidence of sale or hire, medical evidence or bank statements). This evidence will be considered by the authority and, if satisfactory, an appeal will not be contested by that authority and the penalty cancelled. Having considered the grounds of appeal, the respondent authority may also exercise a discretion in the motorist's favour by offering to accept a reduced penalty amount for a further period, or – in such cases that apply – indicating that it is willing to accept a late road user charge.

Appellants are also able to withdraw a registered appeal before its determination. This can arise when evidence submitted by the council is viewed further or more closely (in particular, CCTV recordings that the motorist may not have accessed on the council's website, or CCTV evidence showing the location, signs and markings in place).

Once withdrawn, the appellant has 14 days to settle the penalty amount.

Consent Orders can also be achieved via the appeals portal. Adjudicators may seek clarification on an issue or provide a party with details of established case law that may result in a better understanding and a compromise of proceedings before the appeal is determined by the adjudicator. **1,070** (1,670 previous year) **Consent Orders** were issued in the reporting year.

Referrals from the County Court

Orders issued by the Traffic Enforcement Centre are referred to the adjudicator under Regulation 23 of *The Civil Enforcement of Road Traffic Contraventions (Approved Devices, Charging Guidelines and General Provisions) (England) Regulations 2022* (the '2022 Enforcement Regulations') or Regulation 19 of the 2013 RUC Regulations and the 2013 Welsh Regulations.

The Order of the County Court does not cancel the PCN or a motorist's liability to a charging authority for a road user charge, and this process should not be used unless one of the Grounds for referral to the adjudicator is established:

- (a) that representations were made but a Notice of Rejection was not received
- (b) that an appeal had been lodged to the adjudicator but no response had been received / the appeal outcome is pending / the appeal has been allowed
- (c) the penalty has been paid.

On receipt of the referral, the adjudicator will determine whether a statutory right of appeal has been established, or whether a direction, including a payment direction, should be issued.

In the reporting year, **2,571** (1,824 previous year) **payment directions** were made further to the referral of an Order issued by the Traffic Enforcement Centre.

Further information on the appeals and enforcement process for penalties under the jurisdiction of the adjudicators can be found on the Traffic Penalty Tribunal website at: [tpt.gov.uk](https://www.tpt.gov.uk).

The individual appeal types (parking, bus lane, moving traffic, clean air zones, road user charging and littering from vehicles) had the following numbers and outcomes (previous year shown in brackets).

Parking



Received: 11,156 (9,724). Determined: 9,787

Appeals allowed:	3,519 (3,363), inc. 2,064 (1,892) not contested
Appeals refused:	5,309 (4,119), inc. 111 (65) withdrawn

Bus Lane



Received: 3,667 (3,869). Determined: 3,299

Appeals allowed:	1,160 (1,337), inc. 866 (963) not contested
Appeals refused:	1,650 (1,545), inc. 86 (36) withdrawn

Moving Traffic



Received: 1,963 (852). Determined: 1,850

Appeals allowed:	531 (247), inc. 321 (161) not contested
Appeals refused:	1,033 (415), inc. 49 (8) withdrawn

Clean Air Zone



Received: 4,701 (6,010). Determined: 3,726

Appeals allowed:	1,681 (1,211), inc. 1,337 (893) not contested
Appeals refused:	1,856 (2,305), inc. 32 (65) withdrawn

Dart Charge



Received: 2,390 (3,861). Determined: 2,384

Appeals allowed:	467 (788), inc. 450 (754) not contested
Appeals refused:	93 (134), inc. 46 (61) withdrawn

Merseyflow



Received: 385 (471). Determined: 393

Appeals allowed:	236 (363), inc. 228 (353) not contested
Appeals refused:	46 (27), inc. 11 (9) withdrawn

Durham RUC* Zone



Received: 18 (9). Determined: 19

Appeals allowed:	6 (2), inc. 1 (1) not contested
Appeals refused:	11 (8), inc. 0 (0) withdrawn

Oxford Cong** Charge



Received: 28. Determined: 11

Appeals allowed:	4 , inc. 4 not contested
Appeals refused:	7 , inc. 1 withdrawn

Littering from Vehicles



Received: 49 (30). Determined: 45

Appeals allowed:	18 (8), inc. 4 (4) not contested
Appeals refused:	27 (19), inc. 1 (0) withdrawn

* RUC: Road User Charge

** Cong: Congestion

1.3 Method of decisions

The automated case management system: Fast Online Appeals Management (FOAM)

The Tribunal's online appeals system was created with the aim of providing a service that is user-focused, efficient, timely, helpful and readily accessible. FOAM has proven to be reliable and efficient, being embraced by Tribunal users – nearly 95% of appellants choose to carry out their appeal fully online. The adjudicators respect, however, that using an online system does not suit all users. To ensure access to justice remains for this group, appeals to the Tribunal may still be lodged by post or email. In the reporting year, 5.6% of appeals (a small rise on 4.63% in 2024–25) were lodged in this way. When an 'offline' appeal is received at the Tribunal, the administrative team transfers the notice of appeal to FOAM, allowing the authority to respond to the appeal in the usual way, but with evidence and communications sent to the appellant by post or email.

Types of hearing

The Tribunal provides the parties to an appeal an opportunity to select their preferred type of hearing: either by giving oral evidence (**personal hearing**) or without attendance (**postal ['e-Decision']**, based solely on submitted evidence). In this summary jurisdiction, there is not usually a need for evidence to be tested by cross-examination or supplementary oral submissions. Most appeals are justly determined without attendance, but it is recognised that some motorists prefer to speak directly to an adjudicator. If no hearing type is selected, the case will be automatically allocated to an adjudicator for a postal determination on the evidence submitted by the parties. The adjudicator can, however, mandate attendance of 'any person including a party to the appeal', if necessary.

Postal ('e-Decisions'):

13,232 in reporting year (12,681 in 2024–25).

Personal hearings:

3,297 in reporting year (3,283 in 2024–25):
2,141 (2,146): phone; **1,156** (1,137): video.

Parties to the appeal wishing to present evidence orally can do so by attendance at a personal hearing by telephone or video.

Adjudicators are responsible for managing the hearings and, under the 2022 Appeals Regulations, the 2013 Welsh Regulations and the 2013 RUC Regulations, must conduct proceedings '*...in the manner most suitable to the clarification of the issues and generally to the just handing of the proceedings...*' Whether personal or postal hearing, the adjudicator – having considered evidence submitted by the parties – provides full written reasons for the decision.

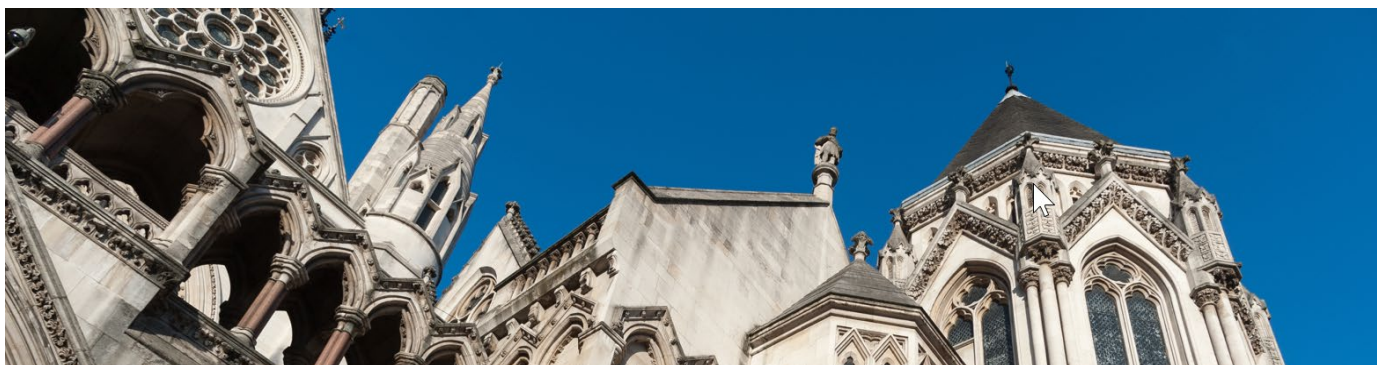
1.4 Costs

The 2022 Appeal Regulations, the 2013 Welsh Regulations and the 2013 RUC Regulations state:

- (1) An adjudicator must not normally make an order awarding costs and expenses.
- (2) But, subject to sub-paragraph (3), an adjudicator may make an order awarding costs and expenses—
 - (a) against a party (including an appellant who has withdrawn an appeal or an enforcement authority which has consented to an appeal being allowed), if the adjudicator considers that—
 - (i) the party has acted frivolously or vexatiously, or
 - (ii) the party's conduct in making, pursuing or resisting an appeal was wholly unreasonable;
 - (b) against an enforcement authority, where the adjudicator considers that the disputed decision was wholly unreasonable.
- (3) An order must not be made against a party unless that party has been given an opportunity to make representations against the making of the order.
- (4) An order must require the party against whom it is made to pay to the other party a specified sum in respect of the costs and expenses incurred by that other party in connection with the proceedings.

The recipient of a Notice of Rejection of Representations served by an authority has a statutory right of appeal to the adjudicator without having to pay an issuing or application fee. Unlike other Courts or tribunals, an award of costs in favour of a successful party does not routinely apply. This is to ensure that the Tribunal is accessible to all, with motorists not discouraged from appealing through fear of further charges or being ordered to pay costs. Costs may be awarded under the regulations only if the opposing party acts in a way that is found by the adjudicator to be '*frivolous, vexatious or wholly unreasonable*'. This is a high threshold of improper conduct – costs in this jurisdiction are not the norm. Costs can also only reflect expenses that have been incurred regarding the actual appeal, with no powers to make an award of compensation.

A limited number of applications (**72** from appellants / **0** from authorities, compared with 96 / 4 in the previous reporting year, respectively), as well as the lack of costs awarded, in the reporting year (down from 6 awards last year) reflects the high threshold required and the adjudicators' limited powers.



2. Judicial Review

An inherent part of the statutory scheme is that proceedings before the adjudicator are final. The review process under the regulations is limited. It is not a fresh or further appeal. It is the High Court that oversees the work of the adjudicators by way of judicial review.

Judicial review is also designed to be limited, allowing a decision of the expert tribunal to be challenged on only three grounds:

- (a) The decision is unlawful, that it is a decision the adjudicator was not entitled to make.
- (b) The decision is a decision that no reasonable tribunal would have made in the circumstances; or
- (c) The decision has been made in a procedurally unfair manner.

The High Court Judge will review the lawfulness of the decision and may uphold it, quash it or return a case to the adjudicator for re-determination. Decisions of the High Court are in turn appealable on a point of law to the Court of Appeal (and beyond).

Adjudicators welcome decisions of the higher Courts as they provide finality and clear direction as to the correct application of the law. This allows cases to be determined consistently; adjudicators being obliged to apply binding interpretations furnished by detailed judgments. Clarity on the law in turn provides motorists and councils with respective clarity on their obligations, rights and responsibilities.

This reporting year saw a number of judicial review applications and outcomes.

2.1 Outcomes – permission granted

The King on the application of Dr Jason Piper v The Adjudicator and Thurrock Council (interested party) AC-2025-LON-004079

**Original Traffic Penalty Tribunal Appeal:
*Dr Jason Piper v Thurrock Council (TPT TK00114-2509)***

Continuation notices are awaited

2.2 Applications – permission refused / case not progressed

The King on the application of Aleksandra Oksztel v The Traffic Penalty Tribunal and Rotherham Metropolitan Borough Council (interested party) AC-2024-LDS-000104

Original Traffic Penalty Tribunal Appeal:

Aleksandra Oksztel v Rotherham Metropolitan Borough Council (TPT RH00001-2401)

The appeal decision

The appeal was refused by the independent adjudicator for the following reasons:

“

1. *This appeal was submitted on behalf of Ms Oksztel by her father, Dr Robert Oksztel. Dr Oksztel said that, while his daughter was driving, a warning light came on in her car and she did not know what it meant. She was suffering from anxiety from a previous car accident, and felt she had to stop immediately so pulled into the parking bay.*
2. *He went on to say that she then contacted her father who told her that it was the battery in her key fob. She was unable to re-start the car. He had spare batteries so drove to where she had parked and changed the battery for her a few minutes later. He had purchased the battery in advance and provided a receipt which was dated some time before the date of the alleged contravention.*
3. *He did not explain why Ms Oksztel was not waiting with the car for him to arrive.*
4. *The council rejected the representations because of the date of the receipt for the replacement battery and they said that it was a driver's responsibility to ensure that the car is not parked in breach of restrictions before it was left unattended.*
5. *A failed battery in a key fob is not an emergency which justifies parking in a restricted parking bay and, had Ms Oksztel felt it necessary to pull in immediately the warning light came on, I would have expected her to remain with the car, if her father was only a few minutes away. Had she done so, she could simply have explained what had happened to the officer.*
6. *I therefore find that the contravention did occur and I dismiss the appeal. Ms Oksztel is required to pay the penalty charge to the council within 28 days.”*

The application for review

The reviewing adjudicator identified no ground for review.

The application for judicial review

The Court identified no realistic prospect of success in establishing that the decision was irrational, cogent reasons having been provided by the original and reviewing adjudicator. The adjudicator has no power to alter the level of penalty imposed.

A renewal application was rejected on 9 January 2026. An application to set that rejection aside was made by the claimant on 21 January. This was refused on 31 March, the Court noting that the prospects for success in the claim were nil.

Original Traffic Penalty Tribunal Appeal:

Mr Syed Azhar Qazmi v Nottingham City Council TPT NG00012-2501

The appeal decision

The appeal was refused by the independent adjudicator for the following reasons:

“

1. *It is not in issue that Mr Qazmi drove his car in this bus lane on the date mentioned on the PCN. Mr Qazmi appealed on the basis that the car is a licensed private hire vehicle (PHV) and PHVs are permitted in the bus lane from 7pm to 7am. He states he sent the required documentation when requested to the Council but they said they never received it. In support of his representations, he provides photographs of his PHV licence permitting him to work as a PHV driver, and a screenshot of a job sheet for the relevant date, together with a photograph of the vehicle displaying a City of Wolverhampton PHV identification plate.*
2. *The Council contests the appeal. They accept that between 7pm-7am PHVs are permitted to use the bus gate but state the appellant produced a photograph showing a City of Wolverhampton PHV identification plate which had expired on 22.1.2024. They add once Mr Qazmi served his notice of appeal, they requested via the messaging facility on the case, a copy of his PHV licence for vehicle registration KE630XF and photographs of the vehicle displaying the City of Wolverhampton Council identification plate. But Mr Qazmi failed to provide this evidence.*
3. *From the evidence provided by the appellant it is clear he is a licensed by the City of Wolverhampton as PHV driver until 6.7.2025. But to have the benefit of the exemption for authorised vehicles it is for Mr Qazmi to prove (on the balance of probabilities) that the vehicle KE63 OXF, seen in the footage using the bus gate, was at the time licensed as a PHV and was also being used as such.*
4. *In order to do so Mr Qazmi has provided to the Tribunal an undated photograph of the vehicle displaying the appropriate PHV plate issued by the City of Wolverhampton showing an expiry date of 23.7.2025. He has not served a copy of the PHV licence issued for the vehicle KE63 OXF, showing the date of issue and expiry date. He has given no explanation for his failure to do so or why when requested by the Council to provide the PHV licence for the vehicle he failed to do so and instead uploaded an image of the vehicle with a PHV plate on it showing an expiry date of 22.1.2024, well before use of the bus gate.*
5. *I accept there is a job sheet for the correct date and time and insurance cover for the vehicle to be used as a PHV and an image of the vehicle with a PHV plate that is valid now, but I have no evidence from Mr Qazmi to show on 11.12.2024 the vehicle had a valid PHV licence. If it did, I cannot understand why a copy of the PHV licence for the vehicle has not been produced to the Council or to this Tribunal and why an image of an out of date plate on the vehicle was provided in the formal representations made in December 2024.*
6. *In the light of such discrepancies, I would expect a clear explanation from Mr Qazmi as to the licensing history of the vehicle KE63 OXH, particularly an outline of when the PHV licence for the vehicle was renewed following expiry in January 2024 and reasons why the PHV licence for the vehicle (as opposed to his PHV driving licence) is not available. Without this evidence Mr Qazmi has not shown that the vehicle was a licensed PHV at the time it was used in the bus gate on 11.12.2024.*
7. *I therefore find insufficient evidence to prove the vehicle was entitled to be exempted from the clearly signed bus gate restriction. I find the contravention occurred.*
8. *The appeal is dismissed. Mr Qazmi is liable to pay the penalty charge.”*

The application for review

The reviewing adjudicator identified no ground for review.

The application for judicial review

The Claimant served a notice of discontinuance on 9 January 2026 and the case was closed.

2.3 Applications received – application issued, outcome pending

The King on the application of Unipex Aggregate Recovery Ltd v The Traffic Penalty Tribunal and Vale of Glamorgan Council (interested party) AC-2026-CDF-000053

Original Traffic Penalty Tribunal Appeal:

Unipex Aggregate Recovery Ltd v Vale of Glamorgan Council VG00005-2601

The appeal decision

The appeal was refused by the independent adjudicator for the following reasons:

“Parties

1. *This is an appeal regarding a penalty charge notice (PCN) issued by Vale of Glamorgan Council.*

The Appellant’s case

2. *The Appellant has provided a full explanation of the grounds of appeal under the heading ‘explanation’ on the online system and in their document at evidence item 1. Representations were made at the informal and formal stages. I have read all of these in full.*
3. *The Appellant’s case before this Tribunal is that the vehicle broke down at approximately 8.30pm on the 9th November 2025. The Appellant and a colleague returned the following day (10th November 2025) at approximately 2.30pm to attend to the vehicle. The delay in attending was due to the need to charge a battery pack which the Appellant says took 12 hours. The Appellant purchased a new battery a few days later and may have a receipt but has not provided this. The Appellant submits that ‘mechanical assistance’ referred to in the informal representations meant that the assistance provided by a colleague was mechanical in nature. The colleague has not provided a written statement. The Appellant confirmed, in the formal representations, that the vehicle did not require professional assistance.*
4. *The Appellant submits that although the Council does not need to disprove the Appellant’s case, the Council cannot question the Appellant’s account of events in a situation where the Council refuses to obtain and examine the CCTV. The Appellant says that only the Council can obtain CCTV and therefore the Appellant has been prejudiced by the refusal to do so and the Council has not been able to properly exercise their discretion. The Appellant contends that in refusing to obtain the CCTV, the Council has failed to exercise their public law duty and has behaved in a manner that is too rigid.*
5. *The Appellant states that regarding the statutory grounds of appeal, as the vehicle had broken down, the Appellant was not in control of the vehicle.*

The Council’s Case

6. *The Council’s case is that the PCN was issued because the vehicle was seen parked for longer than permitted at the location.*

7. *The Council's case is that the vehicle was first observed at 10.42am and the PCN was issued at 11.50am.*
8. *The Council submits that CCTV is for the use of public protection and not for parking matters.*

Findings of Fact

9. *I have considered all the evidence submitted, including the representations from the Appellant.*
10. *If I accept that the vehicle had broken down, I then need to consider whether this provides a ground of appeal and whether the lack of CCTV means that the Council did not properly exercise their discretion not to cancel the PCN. I do not find either of these to be the case for the reasons set out below.*
11. *I do not accept that the Appellant had no other option but to wait for a battery pack to be charged or that this necessitated a delay until 2.30pm the following day. The Appellant has demonstrated a relaxed approach to attempting to move the vehicle which did not include leaving a note with the vehicle or attempting to contact the Council to explain the situation. The Appellant (or someone on their behalf) could have returned to the vehicle on the morning of the 10th November 2025 so as to provide an explanation to anyone lawfully requiring an explanation (the CEO). I find that the vehicle was parked at the location in contravention of the restrictions in place and that the vehicle was under the control of the Appellant. The CCTV showing the vehicle being recovered at 2.30pm does not therefore have a material bearing on the outcome of the case. The Council were justified in not obtaining the CCTV and have demonstrated that they did consider the representations made by the Appellant.*

Outcome of the Appeal

12. *The Council has considered the representations made by the Appellant and have declined to exercise their discretion to cancel the penalty charge. It is not open to me as an adjudicator to exercise such a discretion. I must apply the grounds of appeal as set out in the regulations.*
13. *The Appellant's representations do not satisfy any of the grounds of appeal and amounts to mitigation only. As an adjudicator, I do not have discretion to consider mitigating circumstances. I do not find compelling reasons to refer the case back to the Council.*
14. *The appeal is dismissed. I decide this appeal in favour of the Council as I am satisfied, from the evidence before me, that the penalty was validly imposed in relation to the use of the vehicle and that none of the grounds of appeal are made out.*

Amount to be paid

15. *The amount to be paid is the sum of £50. This Tribunal does not have the power to reduce the amount outstanding."*

The application for review

The reviewing adjudicator identified no ground for review.

Traff-iCase

Parking and Traffic Tribunal Key Cases



3. *Traff-iCase* Website: Two-Year Update

The *Traff-iCase* website (keycases.info) is a publicly accessible library of key cases from civil traffic enforcement appeals across the UK, together with related Court judgments. Launched in March 2024, the site is curated by the Traffic Penalty Tribunal adjudicators.

3.1 Aims and objectives

The website's purpose is to provide a reliable, searchable body of cases to help explain and clarify the law and issues of traffic enforcement that frequently confuse and divide opinion, and which are often misinterpreted. Its target users are motorists – particularly so to illustrate their obligations clearly – and local authorities, as well as the media and other stakeholders.

A case is included on the website only if it provides guidance regarding the interpretation and application of the law and regulations. The expectation is that clear, straightforward information presented through the cases will ultimately lead to a reduction in the number of unwitting contraventions or appeals without merit. The site allows motorists not accepting of the authority's application or assessment of the law (as detailed in a formal Notice of Rejection of Representations document) to research issues that might relate to their case and consider the law independently before deciding whether to lodge an appeal.

3.2 Scope of cases

The case library has grown to 81 key cases from England (inside and outside London), Wales and Scotland, covering 106 distinct issues across the full range of civil traffic restrictions: parking, bus lanes, moving traffic, clean air and congestion charge schemes, bridge crossings and littering from vehicles. The most searched issues include mitigating circumstances, signs and lines, Blue Badges, service of PCNs and the 50% discount.

3.3 User acquisition and activity

Links to *Traff-iCase* are available to users via the Traffic Penalty Tribunal's website and the appeals management system, with authorities also encouraged to include the link in their correspondence to motorists. Further efforts have been made to seed the link in popular consumer channels, including the leading consumer advice service, Money Saving Expert, established earlier this year.

The site has attracted 8,000 unique users to date. Users average five page views per active visit and spend nearly seven minutes on the site per session. These figures are consistent with purposeful, task-oriented use rather than incidental browsing. 38% of all user sessions result in a key case being opened and read – the primary action the site is designed to facilitate – while returning users account for 30% of all traffic, indicating an established base of repeat visitors.

3.4 Looking ahead

The aim is to extend the geographic reach of *Traff-iCase* to include Northern Ireland, as well as incorporating more traffic schemes, such as Merseyflow and new congestion charging schemes in England. Elsewhere, with the Government's announcements this year on new civil enforcement powers for local authorities targeting pavement parking, adjudicator guidance and, in time, decisions, will be central to clarifying their appropriate application in line with regulations. *Traff-iCase* is well placed to serve as a reference channel for both motorists and authorities as this work develops.

4. Training and Appraisal

4.1 Training

The adjudicators attended their annual training conference in Wilmslow on 1 December 2025. The mandatory session allows the adjudicators, who work remotely, to meet and exchange experiences, sharing knowledge and best practice. It is also an opportunity for those who usually only communicate via the case management system or email – adjudicators and staff alike – to meet in person.

Discussions were held on case management issues, ancillary applications, administrative needs and support, as well as data protection. Focused sessions on enforcement camera certification and the *Equality Act 2010* followed.

The Tribunal is fortunate to benefit from the knowledge brought by several adjudicators holding appointments in the wider Courts and Tribunals Judiciary. Sharing and adopting approaches that have proved efficient in other jurisdictions allows the adjudicators to learn from each other, achieving the most efficient appeal journey possible for Tribunal users.

Additional virtual group meetings are held bi-annually (or when the need arises), in order to supplement the in-person training. These meetings provide adjudicators with further opportunities to raise issues that could benefit from discussion; for example, new key cases or processes ensuring that regulations are interpreted and applied consistently.

4.2 Appraisal

Appraisal is mandatory at the Tribunal, with the organisation following the judicial skills and abilities framework issued to Courts and Tribunal Judiciary and reviewed in 2025 by the Lady Chief Justice and the Senior President of Tribunals.

Appraisal is an opportunity for adjudicators to reflect on and review their work, ensuring that standards are maintained and that knowledge is kept up to date. The appraisal exercise also assists in maintaining public confidence in judicial performance, with expected standards kept under review and the law and regulations applied consistently.

Appraisals that were due in July 2025 took place as planned and were completed by September 2025. The skills and abilities scrutinised included:

- (a) Legal and judicial skills – including: legal knowledge and analytical skills, sound judgment and decisiveness.
- (b) Communication skills and personal qualities – including: effective active listening, written communication skills, appropriate authority in the conduct of a hearing and an efficient use of judicial resources.
- (c) Effective working – including: diligence and efficiency, timely decisions and a collegiate and inclusive approach.

Appraisal is welcomed by adjudicators, who recognise that a review of their work is always helpful, however experienced they may be. Appraisal discussions assist in their development and progression, should they wish to develop their work and judicial career by applying for other Courts and Tribunals appointments.

Thanks are extended to senior adjudicator Michael Greenslade, from London Tribunals, who assisted in the appraisal exercise. The Tribunal's next round of appraisals is due in July 2028.



5. The Adjudicators

The Tribunal endeavours to work closely with colleagues at London Tribunals and a number of adjudicators are office holders at both tribunals (including Transport for London's Road User Charging Tribunal).

Current full adjudicator list:

1. Philippa Alderson**
2. Andrew Barfoot
3. David Binns
4. Teresa Brennan*
5. Michael Burke*
6. Joanne Coombe**
7. George Dodd**
8. Cordelia Fantinic*
9. Bhopinder Gandham
10. Joanne Garbett
11. Natalie Goffe**
12. Toby Halliwell
13. Caroline Hamilton*
14. Martin Hoare*
15. Annie Hockaday
16. Judith Ordish
17. Belinda Pearce**
18. James Richardson
19. Mackenzie Robinson*
20. Timothy Thorne*
21. Sarah Tozzi
22. Rhys Williams

The Tribunal is also grateful to its administrative support teams, their hard work and efficiency allowing the adjudicators to focus on determining appeals in a timely, proportionate manner.

Retirements and adjudicator recruitment

This reporting year saw the retirement of adjudicators Katherine Cartwright, Gillian Ekins and Jill Yates, who we thank for their strong commitment to the Tribunal. We wish them a long and happy retirement.

These retirements, coupled with appeal numbers having risen in the reporting year, led to a recruitment exercise being launched in January 2026. Candidates, who must meet the judicial appointment eligibility requirement, have been identified and the final stages of appointment are underway.

The expectation is that 11 newly appointed adjudicators will undergo training in July 2026.

* Environment and Traffic Adjudicators at London Tribunals

** Road User Charging Adjudicators and Environment and Traffic Adjudicators at London Tribunals



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Tribunal**
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