

Wick Woodlands, Hackney Marshes and the surrounding areas PSPO

London Borough of Hackney Equality Impact Assessment form

Question 1: Why are you making this decision? you might want to consider the reasons behind your decision - is it about finding savings, improving services, integrating functions? What does the decision relate to - is it a policy, practice, service, function or initiative? What is the decision-making route (Cabinet, Executive decision)? What are the timescales? What are the key documents that are being produced?

Answer:

The council successfully introduced a Public Space Protection Order (PSPO) from the area known as Wick Woodland on the 13th of June 2019. Since the PSPO was put in place, there has been a significant decrease in the number of reported incidents of 'raves' or parties in the area of Wick Woodland; however, they have been displaced to other parks and green spaces in the localised area, including Hackney Marshes, Millfields, Daubeney Fields and Mabley Green. This PSPO expired on the 13th of June, 2022.

The Metropolitan Police obtained a closure order on 23rd September 2019 covering Hackney Marshes following the displacement of unlicensed music events from Wick Woodland.

In 2020, following several unauthorised events at Hackney Marshes that disrupted nearby residents, damaged wildlife and put people at risk from coronavirus, the council successfully sought an interim injunction, coupled with a power of arrest. On 13 May 2021, the High Court discharged the injunction order following a request by the Council.

The Community Safety, Enforcement and Business Regulation continue to receive complaints from residents about an ongoing nuisance caused by groups of people gathering, bringing generators, lighting, sound systems and decorations in the Hackney Marshes and surrounding areas. Often consuming alcohol and other substances and 'partying' till the early hours and causing nuisance and damage to the Wick Woodland, Hackney Marshes, Millfields, Daubeney Fields and Mabley Green, all places of natural beauty. The damage and pollution caused include leaving litter, defecating, urinating and breaking trees and shrubbery.

Analysis shows that during the summer months of 2022, the Council's parks and green spaces are the most popular locations for UMEs & large gatherings, particularly those in the E5 area, such as Hackney Marshes, Mabley Green, Daubeney Fields and Wick Woodland.

Therefore the Council's Community Safety & Enforcement Team are seeking to introduce a PSPO to include the Network Rail land near the A12, Hackney Marshes, Millfields, Daubeney Fields and Mabley Green.

To make a PSPO, the Council is required by s. 59 of the Anti-social Behaviour, Crime and Policing Act 2014 to be satisfied on reasonable grounds that the PSPO is necessary to prevent the occurrence or recurrence of the activities specified in the PSPO or to prevent an increase in the frequency or seriousness of those activities.

Question 2: Who are the main groups affected? (Consider staff, residents, business, partner organisations and others). Set out who will be affected by this decision or initiative. This should include as much detail as possible showing how you have considered impacts in terms of discrimination, disadvantage and community relations.

Answer:

The proposed PSPO will deal with a particular nuisance and problem in a prescribed area that is detrimental to the local community's quality of life by imposing conditions on the use of that area that applies to **everyone**.

The proposed PSPO is designed to ensure people can use and enjoy our public spaces safe from anti-social behaviour. The Councils recognise the importance of sociable and cultural use of space balanced against the need to ensure inclusive, respectful use of space that doesn't cause nuisance or harm.

The proposed PSPO will impact all equality groups; thus, before implementing the proposed PSPO, the council must balance the needs of the broader community against those using the space and causing anti-social behaviour. The legitimate aims of the PSPO are to ensure that people are free to use this public space from anti-social behaviour.

Hackney's population is estimated at 281,100 people. Hackney is a relatively young borough with a quarter of its population under 20. The proportion of residents between 20-29 years has grown in the last ten years and now stands at just under 25%. People aged over 55 make up only 15% of the population. Hackney's population will likely grow to 294,300 people by 2028 and 325,600 people by 2050.

Hackney is a culturally diverse area, with significant 'Other White', Black and Turkish/Kurdish communities. A large Charedi Jewish community is concentrated in the North East of the borough and is growing. In 2011, 14.5% of Hackney residents said they were disabled or had a long-term limiting illness. Nine out of ten Hackney residents say that Hackney is a place where people from different backgrounds get on well together. Hackney's diversity and multiculturalism are the main factors contributing to residents feeling proud of the borough. Over a third of Hackney residents were born outside the UK.

The people most affected by the activities occurring across the borough are those people that have witnessed the behaviours described above; these include other members of the public and those that live nearby. Some people have been deterred from using our public spaces because of the anti-social behaviour witnessed.

The people most affected by the PSPO, which places restrictions on the activities occurring in our open spaces, are all the people engaging in the activities described above. It is hoped

that it will result in a decrease or even a cessation of the nuisance, annoyance and disturbance, allowing everyone to use these public spaces without experiencing witnessing the damage and nuisance caused by these activities.

Based on data on planned housing developments supplied by Hackney Council to the Greater London Authority, Hackney Wick is an area with the highest growth, along with others with significant housing development. The Hackney Wick ward has a 40-59.9% change in population from 2020-2050.

Hackney takes a graduated approach to enforcement, but a small minority of offenders can cause disproportionate nuisance and expense, so in some cases, prosecution or the threat of prosecution will be necessary. The proposed PSPO aims to promote a consistent, effective and fair approach to enforcement to protect the environment for the benefit of the community and provide a safe place to live, work and visit.

Question 3: What information or evidence have you used to make your decision? (Consider things like statistics, outcome of consultations and other dialogue, good practice from elsewhere). For more information about Hackney's population and equality groups within it, please refer to the Hackney Borough Profile at: https://drive.google.com/file/d/1JZLZFzNUSO40I7-vCA_dy9Dk08e6jXa_/view If you need more in-depth analysis about specific issues such as health, education or the economy, this can be accessed via the Council's Single Evidence Base at: <https://hackney.gov.uk/population>. The Equality pages on the Council's website also have information about Hackney's communities including in-depth profiles of particular protected groups like women or disabled people as well as a comprehensive Equality Evidence Base: <https://hackney.gov.uk/equality-diversity/>

Answer:

A PSPO is a tool implemented under the Anti-Social Behaviour, Crime and Policing Act 2014 to ensure the law-abiding majority can use and enjoy public spaces safe for anti-social behaviour. The proposed PSPO will be introduced to ensure that Hackney has an effective response to tackle ASB in the prescribed area, allowing the space to be used as intended.

PSPOs are intended to deal with a particular nuisance or problem in an area that is detrimental to the local community's quality of life by putting conditions on the use of that area that applies to everyone. They are designed to ensure people can use and enjoy public spaces safe from anti-social behaviour.

Councils can make a PSPO after consultation with the Police and other relevant bodies and communities. The legislation sets out a two-pronged test in which a local authority has to be satisfied on reasonable grounds before a PSPO can be made.

These conditions are as follows:

1. The activities carried out in a public place have had a detrimental effect on the quality of life of those in the locality, or they will likely have such an effect.

2. That the effect or the likely effect of the activities:
 - Is (or is likely to be) persistent or continuous.
 - Is (or is likely to be) unreasonable.
 - Justifies the restriction imposed by the notice.

The Council undertook a consultation for seven weeks from 31 May 2022 until 19 July 2022 to gauge support for the introduction of a PSPO, what else it could include and gain a better understanding of residents' experience of ASB in the prescribed area to better protect and promote the space.

The consultation was created and published on the Council's engagement platform Citizen Space. Paper copies of the survey were made available on request.

Printed leaflets were distributed to 1411 properties surrounding the proposed area for the PSPO. Social media advertising was also targeted to residents around E9 5, E5 0, and E5 9. Additional social media advertisements were run on Twitter, Instagram, Facebook and Snapchat.

Community volunteers at Kingsmead estate supported the consultation by asking residents to complete the survey.

The consultation was also featured in Love Hackney, the Council's magazine, on the Council's Consultation Hub website and in the Council newsletter.

A total of 296 respondents took part in the consultation. The accuracy level for this survey was $\pm 5.2\%$ at a 95% confidence interval. Based on the response rate of this survey which had an accuracy level of $\pm 5.2\%$, this is just outside the threshold of $\pm 5\%$ we aim for in terms of being representative.

The majority of respondents, just under 63%, have experienced antisocial behaviour, noise nuisance or environmental damage at Wick Woodland, Hackney Marshes or the surrounding areas. The highest percentage of respondents, just under 17%, have experienced littering. The highest percentage of respondents, just under 34%, have experienced antisocial behaviour (ASB) 3-5 times in the last six months.

Most respondents, just over 68%, are concerned about antisocial behaviour in Wick Woodlands, Hackney Marshes and the surrounding areas. Just over 40% are very concerned.

The majority of respondents, just under 64%, support the introduction of a Public Space Protection Order (PSPO) as outlined in the consultation introduction and overview. The majority of respondents, just under 68%, do not think any elements of the proposed PSPO should be removed.

The Council is required by s. 59 of the Anti-social Behaviour, Crime and Policing Act 2014 to be satisfied on reasonable grounds that the PSPO is necessary to prevent the occurrence or recurrence of the activities specified in the PSPO or to prevent an increase in the frequency or seriousness of those activities.

The Cabinet report will include the consultation report produced by the Hackney Consultation Team, Police and Council data produced by the Council's Intelligence Hub and a broader evidence base provided by the Council's Community Safety & Enforcement Team.

During the consultation, the Council's Community Safety & Enforcement Team consulted with the following groups during the statutory consultation;

- Residents in Hackney, with a particular focus on residents who live in the Wick Woodland/Hackney Marsh area
- TFL
- Housing Associations
- Canal and River Trust
- Hackney Marsh Partnership
- Hackney Marsh Users Group
- The local chief officer of police. C/Supt Marcus Barnett.
- The police and crime commissioner. Mayor Sadiq Khan.
- London Borough of Newham.
- London Borough of Tower Hamlets.
- London Borough of Waltham Forest.
- London Legacy Development Corporation.

Impact Statements have been obtained from residents, user groups, and interested parties outlining the detrimental impact these actions have had on the local community and environment.

Various other measures have been tried and/or considered to tackle the detrimental effect that has been evidenced. Council Officers have, in coordination with the Metropolitan Police, taken many actions in response, including:

Designing out ASB: in March 2017, the LBH Parks Team, in partnership with the Police Safer Neighbourhood Team and the Community Payback Unit, planted around 40 trees (donated by the Woodland Trust) in Wick Woodland to constrict the central clearing and make it harder for it to be abused/used by unauthorised events of 300+ people. A small clearing was intentionally preserved so school groups and others could continue to use the area, peaceably enjoying the woodland. Mobile CCTV provisions have been deployed to the area to identify when many people attend the road network surrounding the prescribed area.

Proactive and reactive patrolling: The police and Council officers where resourcing allows have proactively patrolled the location. Enforcement Officers are highly visible uniformed, have high levels of enforcement powers and wear body cameras that record video and audio for evidential purposes. The Enforcement Officers are not designed as a "blue-light response" team. They are tasked using an intelligence-led approach, i.e., according to crime and ASB hot spots identified through information and intelligence through weekly Partnership Tasking and joint briefings with Police SNT. There is a small capacity for response work. However, they are currently operating at maximum capacity, and there is no scope to be able to direct further resources to parks and green spaces within current budgets.

Statutory Noise Nuisance: Officers have visited the location several times and assessed the noise, finding that it was not likely to cause a statutory nuisance; however, a private nuisance may occur, causing a nuisance to neighbouring residents. The difficulty with enforcing a private nuisance is that unknown individuals organise gatherings.

Bylaws: Hackney's bylaws for its parks, gardens and open spaces were approved by the Secretary of State in 1932 - they are now largely out of date, difficult to enforce and not fit for purpose. Antisocial Behaviour (ASB) Warning Forms have been issued for breach of bylaws. These forms are used when Enforcement Officers encounter incidents of ASB not exclusive to rowdy or inconsiderate behaviour. They are not a replacement for Fixed Penalty Notices (FPNs); the relevant FPN should be given when an offence is committed. ASB notices can be issued alongside FPNs and other Formal Notices. Accredited Officers have the power to require people's names and addresses who are causing antisocial behaviour. Although all officers can use the books, refusing to provide details is only an offence when Enforcement Officers are Community Safety Accreditation Scheme (CSAS) accredited.

Injunctions: In 2020, following several unauthorised events at Hackney Marshes that disrupted nearby residents, damaged wildlife and put people at risk from coronavirus, we successfully sought an interim injunction, coupled with a power of arrest, to prevent them while we explored longer-term options. On 13 May 2021, the High Court discharged the injunction order following a request by the Council.

Community Protection Notices: community protection warnings have been issued to individuals engaged in anti-social behaviour.

Dispersal zones: the police have previously put in place dispersal zones at the request of Council officers following receipt of intelligence. This requires procedural steps to be followed in advance and resourcing by the police to enforce when police resources are limited. There are limitations to using dispersal zones as they can last for a maximum of 48 hours per s.35(4).

Closure Orders: the police have previously used a closure order to prohibit access to all persons except recreational users (other than those attending to organise/attend events playing amplified music).

PSPO: In June 2019, the council introduced a PSPO to protect Hackney Wick Woodland from environmental damage and limit the disturbance caused by loud music and antisocial behaviour resulting from illegal raves in the area. The PSPO expires in June 2022.

From September 2021, Hackney Council has received 490 complaints about unauthorised events. The Council's Intelligence Hub performed a search of anything that refers to a "rave" UME or large gathering. The extract below summarises all reported UMEs to the council (noise) and the Police DARIS (only where they are reported with an ASB classification) since September 2021. Note that the council only has the Police Data from September 2021 and noise from January 2022, so it is most reliable between January and August this year.

Mabley Green - 50 reports.

Hackney Marshes - 38 reports.

Wick Woodland - 19 reports.

Daubeney Fields - 16 reports.

Millfields Park - 19 reports.

North Millfields Parks - 19 reports.

Green spaces suffer disproportionately from reported raves and UMEs. This data is based on call data, not the case/complainant data so that some calls may relate to the same events.

Intelligence suggests that unauthorised events are much greater than the number of formal complaints received, with residents citing repeated incidents over the summer months.

Complaints have raised concerns about large gatherings of sometimes hundreds of individuals, lasting for up to 48 hours, resulting in

- Noise from amplified music often until and beyond the early hours of the morning (disturbing residents and risking negative impacts on nesting birds and nocturnal wildlife)
- Alleged supply and consumption of illegal drugs
- Associated littering, including empty laughing gas canisters
- Open fires
- Damage to the ecology through the creation of clearings, removal of newly planted trees and damage to the environment.

These events go back a long time. The Community Safety & Enforcement Team has restricted the details to events since 2020 and refers to some incidents that occurred in 2019 within their evidence base. They have listed specific incidents that have been taking place since 2020 in chronological order. We will deal with the most recent events taking place in 2022 first.

Evidence shows that the Wick Woodland PSPO generally had invaluable and beneficial impacts on the local environmental quality; however, it did not eliminate UME in the prescribed area. It is acknowledged that simply having an Order in place is unlikely to resolve an issue overnight. Council Officers & Police The Wick Woodland PSPO responded to breaches of the PSPO and found that warnings and words of advice were sufficient to resolve the ASB at the earliest possible opportunity. This demonstrates that the PSPO is an effective method of reducing the identified problems.

The Wick Woodland PSPO and Hackney Marshes Injunction sent out a clear message to residents and users of our parks and open spaces that the detrimental behaviours included in the orders would not be tolerated and helped reassure the community that the council was taking action to address unreasonable conduct.

The introduction of the PSPO and Injunction was supported by a communications plan that relied heavily on social media and signage that helped residents and visitors understand the orders and reduced the need to rely on enforcement measures.

The proposed PSPO is designed to ensure people can use and enjoy our public spaces safe from anti-social behaviour.

The Community Safety & Enforcement Team recommend this PSPO be introduced as it will foster good relations between people by enabling those with protected characteristics and those without to enjoy the council's open spaces without being detrimentally affected by the behaviours prohibited by the order. It is believed that the proposed PSPO will positively impact people's ability to use public spaces safely and without fear of nuisance, annoyance or other anti-social behaviour.

For a richer image of the incidents, please click [here](#).

Question 4: What positive impacts will this decision have? (Consider impacts on different equality groups, community relations, health and economic wellbeing)

Answer:

A PSPO is a tool implemented under the Anti-Social Behaviour, Crime and Policing Act 2014 to ensure the law-abiding majority can use and enjoy public spaces safe and free from anti-social behaviour. The proposed PSPO will be imposed to ensure that Hackney has an effective response to tackle ASB in the prescribed area allowing the space to be used as intended.

PSPOs are intended to deal with a particular nuisance or problem in an area that is detrimental to the local community's quality of life by imposing conditions on the use of that area that applies to everyone. They are designed to ensure people can use and enjoy public spaces safe from anti-social behaviour.

The PSPO Consultation provides a precise analysis of the respondents.

Most respondents of the consultation, just over 76%, stated that they live in the area (215). This is followed by "other" (42), "I commute through here" (16) and "I work here" (9). Respondents who stated "other" were asked to specify their connection to the area (base 62):

Age - The highest percentage of respondents, just under 33%, stated that they are aged 35-44 (95). This is followed by 25-33 (59), 45-54 (52), 55-64 (45), 65-74 (22), 75-84 (6), 18-24 (5), 16-17 (4), under 16 (3) and over 85+ (1).

The impact on all of the community, including the elderly, young people and children, has been taken into account in implementing the PSPO, not least the impact on young people who live in the borough who have felt increasingly excluded from being able to access and enjoy open spaces. For the avoidance of doubt, this does not just refer to young children whose parents have felt unable to allow them to play in open spaces due to littering, urination, defecation and anti-social behaviour, but also older young people. At least 80% of the time of those aged 70 and over is spent in their home and immediate area. Older people spend more time in their close neighbourhood than any other generational group. Walking and a neighbourhood's walkability have been directly linked to improved fitness, enhanced

cognitive function, protection from further mobility loss and can 'buffer' against depression in older age. Safety is a concern for all age groups; therefore, the proposed PSPO should positively impact all generations. All ages will benefit from improved cleanliness and reduction in noise.

Disability - The majority of respondents, just over 95%, stated that they do not consider themselves to be disabled (242). Just under 5% of respondents believe themselves to be disabled (42).

It is recognised that this group may be less able than others to use alternative places due to a potentially restricted ability to reach other public spaces. The proposed PSPO will encourage more responsible use of our open space, especially prohibiting the destruction or damage of trees, shrubs, plants or other flora, fauna, woodland or wildlife which has previously caused interruption to users of our parks and green spaces.

Gender - Most respondents, just over 57%, stated they were female (162). Just under 43% of respondents said they were male (120). If respondents preferred to use their terms, they were asked to provide this. One respondent stated that they are non-binary. Most respondents, just over 94%, said their gender is the same as the sex they were assumed to be at birth (260). Just under 6% of respondents stated that their gender is different to the sex they were assumed to be at birth (16).

Transgender people, including those who have gone through or are going through gender reassignment, experience high levels of hate crime and discrimination. Safety concerns all genders; therefore, the proposed PSPO should positively impact all ages. All genders will benefit from improved cleanliness and reduction in noise and associated anti-social behaviour.

Marriage and civil partnership - The proposed PSPO is expected to have a neutral effect on this group.

Pregnancy and maternity - The proposed PSPO is expected to have a neutral effect on this group.

Race - The majority of respondents, 81%, stated that they are White or White British (222). This is followed by other ethnic groups (18), mixed background (13), Black or Black British (15), and Asian or Asian British (6).

The proposed PSPO will encourage more responsible use of our open space, especially the alcohol-fuelled antisocial behaviour. The proposals are believed to impact those with this protected characteristic positively.

Religion or belief - The majority of respondents, just under 75%, stated that they are Atheist or have no religious belief (192). This is followed by Christian (44), secular beliefs (9), Jewish (5), Muslim (4) and Buddhist (3).

The proposed PSPO is expected to have a neutral effect on this group.

Sexual Orientation - The majority of respondents, just under 79%, stated that they are heterosexual (193). This is followed by bisexual (19), gay man (21) and lesbian or gay woman (12).

The proposed PSPO is expected to have a neutral effect on this group.

Therefore, the proposed PSPO would prevent the area from being misused and provide immediate relief to the residents, improving their safety and quality of life and deterring those who are participating in and organising gatherings which are causing severe nuisance and antisocial behaviour, increasing the fear of crime and perception of safety within the community.

Question 5: What possible negative impacts could there be? Please explain how these are justified and/or what actions will be taken to address them.

Answer:

The proposed PSPO sets out a range of powers available to the Council and how these will be legally applied. Its use will be determined by the behaviour occurring and is not directed at any protected group.

Regarding the rights protected by the Human Rights Act 1988, the 2014 Act requires the Council to have *particular* regard for Article 10 (freedom of expression) and Article 11 (freedom of assembly/association). The possible right that might be engaged in Article 11.

The proposed Borough-wide restrictions restrict *how* people can use our open spaces, not their ability to use them or gather there.

As such, the PSPO does not interfere with Article 11 rights to assemble and/or associate with others. However, even if Article 11 were interfered with, the interference would be justified as being prescribed by law and in pursuance of a legitimate aim (namely, in the interests of public safety, the protection of public health, the prevention of crime and disorder, and the protection of the rights and freedoms of others). The terms of the proposed PSPO are proportionate and necessary.

In response to the issues raised by respondents to the consultation, the Council has taken account of these, and the richer response is detailed [here](#)

Identifying any emerging or actual hotspots and the tasking of Police and Enforcement resources remains a standing agenda item of the monthly Partnership Tasking Group chaired by the Community Safety Partnership Manager. There is also more granular activity through the Anti-Social Behaviour Action Panels meetings, which address singularly impacted issues at the individual level with specific agencies, particularly Housing.

Hackney Enforcement Officers are tasked weekly at the internal weekly taking meeting co-ordinated by the Intelligence Hub, the purpose of which is to:

- Coordinate deployment of staff using an evidence-based approach to provide targeted action and patrols, including planning for upcoming events, and seasonal peaks of activity that require action on a cyclical basis
- Highlight emerging patterns and trends and plan targeted early intervention and activities.
- Provide a staff briefing
- Enable a more joined-up and efficient use of Service provision in Hackney
- Provide a transparent and auditable decision-making process that will stand up to scrutiny and justify how / why decisions have been reached. Provide a full list of all actions/taskings completed and actions taken to resolve issues.

Partnership Tasking takes place monthly and is aligned more closely with the Police tasking process. The Intelligence Hub raises issues with the Police (as a by-product of the weekly tasking). Any requests to or from the Police for assistance will be discussed at this meeting if a multi-agency problem-solving approach is better suited.

The proposed PSPO operation will be reviewed at the meeting of the tasking mentioned above. The advice, warnings and enforcement of the proposed PSPO will be logged in the pocket notebooks of Officers and on Council and Police databases.

The Authorised Officers who will enforce the proposed PSPO will continue to consider the needs of the individuals and their circumstances to make an informed and balanced decision on the appropriateness of action to take. Officers will continue to receive training on equality and diversity.

The performance of the proposed PSPO will be reported to the Corporate Committee annually to ensure a balance between proportionate enforcement and acceptable behaviour in the borough.

The proposed PSPO sets out a range of powers available to the Council and how these will be legally applied. The PSPO reflects national legislation, and the various powers would have been assessed for their impact on equality as part of the consultation and development process before the legislation was enacted. Its use will be determined by the behaviour rather than any protected group.

Question 6: Describe the recommended decision

Answer:

The introduction of the proposed PSPO will impact the lives of people who live, work and visit Hackney. The proposed restrictions will positively impact people whose protective characteristics are impacted by the anti-social behaviour the order is designed to address. This action is proportionate and necessary.

Please list specific actions which set out how you will address equality and cohesion issues identified by this assessment. For example, practical steps or actions that you will take to enhance positive impacts and mitigate against negative impacts (identified in Section 4 above). Your actions should also be included in any action plan or report connected to this assessment, such as a delegated powers report, savings template, business case or Cabinet report.

Answer:

I can confirm that the Council has had due regard to the public sector equality duty found in s.149 of the Equality Act 2010. In particular, the PSPO will foster good relations between people by enabling those with protected characteristics and those without to enjoy the Council's open spaces without being detrimentally affected by the behaviour described in this report. It is believed that the proposed PSPO will positively impact people's ability to use public spaces safely and without fear of nuisance, annoyance or other anti-social behaviour.

Any abuse of discretion when enforcing the proposed PSPO will be dealt with swiftly using internal procedures, which could include additional training or management action.

Anyone who is issued Fixed Penalty Notices given for breach of the proposed PSPO may make representation or lodge a corporate complaint which would be investigated and responded to by a Senior Manager.

It is important to note that there are no formal grounds for appeal against a Fixed Penalty Notice (FPN). It is an invitation for an individual to discharge their liability to prosecution. In essence, this means that whilst this is not an admission of an individual's guilt, it is an agreement that the individuals accept that an offence has been committed and that by paying the sum of money specified, no further action will be taken by, or on behalf of the Council. This method of dealing with offences saves time for everyone involved in prosecuting cases at court, and the cost associated with an FPN is likely to be substantially lower than any fine imposed by the courts.