

# Public Document Pack



## Agenda Supplement

Dear Councillor

### **FINANCE, ASSETS, INVESTMENT & RECOVERY COMMITTEE - WEDNESDAY, 12TH JULY, 2023**

I am now able to enclose, for consideration at next Wednesday, 12th July, 2023 meeting of the Finance, Assets, Investment & Recovery Committee, the following reports that were unavailable when the agenda was printed.

<b>Agenda No</b>	<b>Item</b>
------------------	-------------

- |    |  |
|----|--|
| 5. | <b><u>Ultra Low Emission Zone Expansion</u></b> (Pages 3 - 14) |
| 7. | <b><u>Town Hall Car Parking</u></b> (Pages 15 - 22)            |

Yours sincerely



Jonathan Stephenson  
Chief Executive

Encs

**Brentwood Borough Council**, Town Hall, Ingrave Road, Brentwood, Essex CM15 8AY  
**tel** 01277 312 500 **fax** 01277 312 743 **minicom** 01277 312 809 **www.brentwood.gov.uk**





## FINANCE, ASSETS, INVESTMENTS AND RECOVERY COMMITTEE

12 JULY 2023

<b>REPORT TITLE:</b>	Ultra-Low Emission Zone Expansion
<b>REPORT OF:</b>	Greg Campbell, Director of Policy and Delivery

### REPORT SUMMARY

This is an information report that identifies some of the actions being taken by local authorities neighbouring London but not within the new Ultra Low Emission Zone (ULEZ). Further the report outlines the measures the Leader and Administration will propose to the Mayor of London and Transport for London to mitigate the impact on Brentwood residents and small businesses following the expansion of the Ultra-Low Emission Zone (ULEZ) from 29 August 2023 across all London boroughs.

A letter is being drafted to be sent to the Mayor of London and Transport for London. The report gives members understanding of other local authorities' actions and stance on the proposed introduction of the ULEZ Charge. Further that members are aware of the Leaders letter to the Mayor of London and Transport for London expressing our support for Brentwood residents and small businesses to receive the same support as those living in London.

### SUPPORT ING INFORMATION

#### 1.0 BACKGROUND INFORMATION

Launched in 2019 to help clear up London's air, the Ultra-Low Emission Zone (ULEZ) operates 24 hours a day, 7 days a week, every day of the year, except Christmas Day (25 December). The zone currently covers all areas within the North and South Circular Roads.

ULEZ compliant cars are those that meet the emissions standards and includes most petrol cars registered since 2006 and most diesel cars registered since September 2015.

Those with a vehicle that doesn't meet the ULEZ emission standards and isn't exempt, must pay a £12.50 daily charge to drive inside the zone. This applies to:

- Cars, motorcycles, vans and specialist vehicles (up to and including 3.5 tonnes) and minibuses (up to and including 5 tonnes)
- Lorries, vans or specialist heavy vehicles (all over 3.5 tonnes) and buses, minibuses and coaches (all over 5 tonnes) do not need to pay the ULEZ charge. They will need to pay the LEZ charge if they do not meet the Low Emission Zone (LEZ) emissions standard.

The ULEZ is expanding from 29 August 2023 across all London boroughs.

It is also important to note that a Judicial Review being referred to as a 'legal roadblock' is being sought by London Boroughs of Harrow, Hillingdon, Bexley and Bromley and Surrey County Council to the expansion of ULEZ on the 29<sup>th</sup> August. The Court hearing was held on the 4<sup>th</sup> and 5<sup>th</sup> July and it had hoped that the outcome would be made prior to this report being published. However, the outcome was still awaited when this report was published and if able a verbal update will be given to the Committee.

### **Support for London residents and businesses**

Londoners receiving certain low-income, or disability benefits can apply to the Mayor of London's £110 million scrappage scheme. Eligible applicants could receive a payment to scrap their vehicle or choose a lower payment plus one or two TfL Annual Bus & Tram passes.

London-based sole traders, micro-businesses (10 or fewer employees) and registered charities will also be able to apply to scrap or retrofit a van or minibus. There are also exclusive ULEZ support offers for successful scrappage scheme applicants, whether eligible for a scrappage payment or not.

### **Support for Brentwood residents and businesses**

The expanded ULEZ will now extend to the M25 boarder, affecting many more people, including Brentwood residents visiting or working in Greater London. In a response to the expanding ULEZ, the Council agreed at its meeting of Ordinary Council 15<sup>th</sup> March 2023 Min 419 that:

“This Council opposes the expansion proposal and supports Essex County Council in not co-operating with the installation of any signage to support such an expansion.”

Further and again in response to this expansion the Leader of the Council will be writing on behalf of the Administration to the Mayor of London and Transport for London asking that the same support afforded to residents and businesses in London is extended to Brentwood residents and its small businesses. These opportunities include but not limited to receiving financial assistance to scrap the highest polluting cars and avoid the daily ULEZ charge.

Further, within this letter the Leader of the Council will request a meeting with the Mayor of London and Transport for London and / or ULEZ to discuss ways to mitigate the impact of the ULEZ expansion on Brentwood residents and businesses and to explore options for improving public transport into and out of London.

The points that will be raised in the letter from the Leader of Brentwood Joint Administration Group are set out below for information:

- Recognise the challenges and aspirations of improving air quality but suggests that greater support is necessary for the boroughs that surround London
- Targeted exemptions are necessary and fair before implementation of the extended scheme during the cost-of-living crisis
- Brentwood residents and businesses have no access to the car or van scrappage scheme
- Brentwood residents and businesses, particularly those in rural areas, have heavily reduced access to public transport links to Havering, not least for access to Queens Hospital, and support for improving the public transport system, at least on a transitional basis, would benefit individual health outcomes
- TfL's support of the 498 route is welcome, but consideration is requested for an additional route from Brentwood to Upminster station to access the c2c line when there are engineering works on the Greater Anglia or Elizabeth Line.

The letter will ask for the Mayor of London's office to engage with the Administration, Essex County Council, and central government to support our residents who would be financially affected by the proposals. Its letter will therefore further seek:

- The existing scrappage scheme should be extended to all the district and borough authorities on the boundary to the newly developed ULEZ

- There should be an increase in the amount of financing available for the scrappage scheme, which should be substantially funded by central government
- TfL and the Government should provide funding to improve public transport and cycle routes connecting London Boroughs to those authorities on the boundary of ULEZ.

The letter will also inform the Mayor of London and Transport for London that Brentwood are exploring what action we can take to limit the negative impacts of the expansion, working with other affected councils.

### **Other Authorities' Approaches**

The Council has conducted research to understand the approach that other authorities that boarder the extended Ultra-Low Emission Zone have taken and has established the following:

<b>Local Authority</b>	<b>Approach</b>
Essex County Council	ECC will not allow any other areas to use the County Council's land for cameras or other equipment related to the proposed expansion of the Ultra-Low Emission Zone.
Thurrock Council	Motion carried condemning plans to extend the ULEZ. Meeting scheduled with Transport for London on 03.07.23
Kent County Council	KCC has written to the Mayor of London to discuss proposals and how mitigating measures can be put in place to ease the burden on vulnerable people and groups in Kent.
Dartford Borough Council	Proposed a motion to call upon the Mayor of London to reverse the policy
Sevenoaks District Council	Expressed concern to TfL that residents may travel to alternative towns to avoid the ULEZ charge, thereby increasing their journey time and emissions through the district. SDC ask TFL to consider including residents and businesses on the fringe of the ULEZ (up to the M25) in any schemes that help address inequalities caused by the expansion of the ULEZ (i.e., scrappage schemes).
Tandridge District Council	Submitted an objection to the ULEZ consultation proposed extension, fearing that high emission vehicles will make detours into the district to avoid the charges, leading to more air pollution. TDC request that consideration is given to making an exemption for

	vehicles that are registered in adjoining authorities. TDC have no plans to make a representation for support.
Surrey County Council	Launched a legal big against Transport for London and Mayor of London, along with London boroughs of Bexley, Bromley, Hillingdon, and Harrow.
Reigate and Banstead Borough Council	No information available
Epsom and Ewell Borough Council	E&EBC asks that <ul style="list-style-type: none"> <li>• provision is required for exempt routes which enable access to essential places and roads, such as the M25</li> <li>• Owners of non-exempt vehicles in EEBC to be included in any scrappage scheme that the Mayor of London is requesting from central government for London borough residents.</li> </ul>
Mole Valley District Council	Wrote to the Mayor of London to advise that help needs to be given to those who live in Mole Valley, work within the expended zone, and need to update their vehicle. This should be done through an extension to the scrappage scheme to residents beyond the expansion zone boundary. Mole Valley is also concerned about the potential impacts of traffic seeking to avoid the expanded zone.
Elmbridge Borough Council	Motion passed against the ULEZ proposals and supporting the extension of Zone 6 to all the Borough. The Council has successfully secured meetings with Transport for London to discuss the concerns of Elmbridge residents and businesses, together with effective measures to mitigate the impact. EBC will match the approach taken by Surrey County Council to withhold use or access to all Council owned or controlled land for the use of infrastructure or signage associated with the expansion of ULEZ; and (subject to the discussions referred to above) no Council officer or financial resource (including assets) will be made available to facilitate ULEZ expansion without seeking agreement of Full Council.
Spelthorne Borough Council	Transport for London and the Mayor of London must work with SBC and with Surrey County Council to improve local public transport and cycle ways and other sustainable travel initiatives such as the expansion of TFL's Zone 6.

	SBC want the scrappage scheme extended into Spelthorne
Slough Borough Council	Raised concerns about the impact of the expanded ULEZ and stated it wishes for the wider benefits of sustainable transport to be invested in the town to balance the expected impacts on major transport links to and from London.
Buckinghamshire Council	<p>Concerned about the impact the extension of the scheme will have locally, Buckinghamshire Council is calling for the proposals to be reconsidered or scrapped altogether. If the ULEZ is to be expanded, Buckinghamshire Council would like to see:</p> <ul style="list-style-type: none"> <li>• An extension of the scrappage scheme being given to those living in London so people and businesses within Buckinghamshire are given the same benefits and incentives for upgrading their vehicles to cleaner models</li> <li>• Coordination with neighbouring local authorities to expand and improve public transport options and improve active travel routes between Greater London and Buckinghamshire</li> <li>• A commitment that a proportion of the revenue from the extended ULEZ would be reinvested, to support the improvement of public transport and active travel options into and out of London</li> <li>• Highlighting alternative transport options available directly to Buckinghamshire residents</li> </ul> <p>We are also concerned about the potential increased number of vehicles redirecting onto our local roads to avoid entering the ULEZ. Not only does this impact on traffic and road surfaces, but it also has the potential to see more polluting vehicles travelling on our roads, worsening air quality for our residents.</p> <p>Alongside a number of local authorities in Greater London and the home counties, Buckinghamshire Council is refusing to sign an agreement to allow TfL to install street signs and cameras along its highways in order to enforce the expanded Ultra Low Emission Zone.</p>
Three Rivers District Council	No information available
Watford Borough Council	Watford Council calls for:



	<ul style="list-style-type: none"> <li>• The immediate announcement from the Labour Mayor of London that ULEZ expansion will be halted or delayed.</li> <li>• Watford residents to be included in TfL's scrappage scheme to enable the transition from polluting vehicles to ULEZ compliant vehicles.</li> <li>• Investment from TfL and Hertfordshire County Council in public transport in order to help the switch from private to public transport</li> <li>• The inclusion of Watford stations into zone 6 of the TfL network to reduce costs for local residents.</li> </ul>
Hertsmere Borough Council	<p>Approved a motion that called for the Mayor of London to reconsider the expansion of the zone. The motion also called for the restoration of a bus service between the borough and Barnet to mitigate the impact of the ULEZ expansion zone, particularly the impact on local hospital patients and key workers.</p> <p>The motion also called for support to be sought from Hertfordshire County Council, London Borough of Barnet councillors, London Assembly Member, and for a public meeting with Transport for London to be held to discuss how to bring about a replacement route.</p> <p>The Cabinet will be meeting with TfL to discuss the cross-boundary issues, yet to be arranged. A positive cross-party meeting with the Deputy Mayor for Transport has also taken place and dialogue is ongoing.</p> <p>HBC support the idea that Hertsmere residents should also benefit from a scrappage scheme like residents of the London Boroughs, however we believe that this will need to be funded by central government in the same way that they have provided scrappage funding in other cities, including Birmingham, Bristol and Portsmouth.</p> <p>The Cabinet are not opposed to the expansion but will continue to press for mitigations and dispensations for our residents in addition to seeking greater investment in cross-boundary bus services.</p>
Welwyn Hatfield Borough Council	No information available
Broxbourne Borough Council	No information available
Hertfordshire County Council	HCC would welcome any support for a wider scrappage scheme. They do not accept that any signage, cameras

	<p>aimed at fining their drivers should be based in Hertfordshire.</p>
<p>Epping Forest District Council</p>	<p>In response to the TfL consultation on the proposals to extend the ULEZ, EFDC advised in principle they support the aims of the expansion put forth by TfL but also have concerns that TfL and the Mayor of London need to address:</p> <ul style="list-style-type: none"> <li>• Traffic displacement - EFDC ask that TfL model for this or at least provide additional information to demonstrate whether the hypothesis of traffic displacement is valid and if so, propose measures to mitigate the negative impacts</li> <li>• Creation of a pollution corridor - EFDC ask that TfL model for this or at least provide further information to demonstrate if the hypothesis of a pollution corridor is valid and if so, propose measures to mitigate the negative impacts.</li> <li>• Impact on Air Quality Management Area - EFDC ask that TfL provide more detailed information regarding the proposed ULEZ expansion's impact on AQMA and whether this expansion will delay the time it will take for our AQMA to be revoked</li> <li>• Impact on Special Area of Conservation - EFDC ask that TfL model for the impact of the ULEZ expansion on the EFSAC in relation to ammonia concentrations.</li> <li>• Impact on the current public transport system and road network - EFDC ask that TfL keep the provision of public transport in the district under review to ensure that residents and people who commute to and from the District for work, education and leisure are not negatively affected should commuter usage increase as a result of the ULEZ expansion; and to avoid an increase in vehicular traffic in our District.</li> <li>• Insufficient time and scrappage scheme - EFDC ask that TfL and the Mayor of London expand the scrappage scheme radius to boroughs/Districts that directly border the Greater London border to maximise the effectiveness of the scheme. We also ask that a sunset period extending past the August 2023 implementation date is offered to residents and businesses who reside/operate in boroughs/Districts that directly border Greater London.</li> </ul>

	<ul style="list-style-type: none"><li>• Poor provision of EV charge points in TfL car park - EFDC ask that TfL install EV charge points for taxis and public use at their car parks situated in the District</li></ul>
--	--

## **2.0 FINANCIAL IMPLICATIONS**

**Name & Title: Tim Willis, Director – Resources & Section 151 Officer**  
**Tel & Email: 01277 312500 / tim.willis@brentwood.rochford.gov.uk**

There are no direct financial implications arising from this report.

## **3.0 LEGAL IMPLICATIONS**

**Name & Title: Claire Mayhew, Joint Acting Director – People & Governance & Monitoring Officer**  
**Tel & Email: 01277 312500 / claire.mayhew@brentwood.rochford.gov.uk**

There are no direct legal implications arising from this report.

## **4.0 RESOURCE IMPLICATIONS: STAFFING, ICT AND ASSETS**

None

## **5.0 RELEVANT RISKS**

None

## **6.0 ENGAGEMENT/CONSULTATION**

This update report and subsequent feedback from members will be used to inform the content of the letter from the council.

## **7.0 EQUALITY & HEALTH IMPLICATIONS**

**Name & Title: Kim Anderson, Corporate Manager - Communities, Leisure and Health**  
**Tel & Email: 01277 312500 / kim.anderson@brentwood.gov.uk**

The Public Sector Equality Duty applies to the Council when it makes decisions. The duty requires us to have regard to the need to:

- a) Eliminate unlawful discrimination, harassment and victimisation and other behaviour prohibited by the Act. In summary, the Act makes discrimination etc. on the grounds of a protected characteristic unlawful

- b) Advance equality of opportunity between people who share a protected characteristic and those who do not.
- c) Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.

The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion or belief, gender, and sexual orientation. The Act states that 'marriage and civil partnership' is not a relevant protected characteristic for b) or c), although it is relevant for a).

The proposals in this report will not have a disproportionately adverse impact on any people with a particular characteristic.

## **9.0 ECONOMIC AND CLIMATE IMPLICATIONS**

**Name & Title: Phil Drane, Director - Place**

**Tel & Email: 01277 312500 / phil.drane@brentwood.rochford.gov.uk**

The environmental and climate implications of the ULEZ expansion are central to the proposal: to improve air quality by reducing/restricting carbon emissions from vehicles. As is raised in this report and supported by some other local authorities surrounding Greater London, these overarching environmental aims are to be recognised. However, the economic implications of expansion felt by residents and businesses in Brentwood borough are increased by the lack of concessions and/or exemptions available to those within Greater London. To best mitigate economic implications for the borough, the letter seeks additional investment in public transport links with Greater London, which would benefit both the local economy and wider London and South East economic links.

**REPORT AUTHOR:** Name: Greg Campbell  
Title: Director of Policy & Delivery  
Phone: 01277 312500  
Email: greg.campbell@brentwood.rochford.gov.uk

## **APPENDICES**

None

## BACKGROUND PAPERS

None

## SUBJECT HISTORY (last 3 years)

<b>Council Meeting</b>	<b>Date</b>
Ordinary Council	24/02/2023
Ordinary Council	15/03/2023

This page is intentionally left blank



**COMMITTEE TITLE:** Finance, Assets, Investments & Recovery Committee

**DATE:** 12 July 2023

<b>REPORT TITLE:</b>	Town Hall Car Park
<b>REPORT OF:</b>	Phoebe Barnes, Director Assets and Investments

## REPORT SUMMARY

The demand on staff parking is increasing. The North Car park at the Town Hall Ingrave Road, is predominantly allocated for staff however it currently is an allocated public car park in the borough. Staff, members, and visitors travelling to the town hall are unable to park as the public utilise the spaces. To manage the parking effectively at the Town hall it is recommended that Zone A is returned to a staff car park Monday – Friday and that the car park be made for public parking at weekends only.

## RECOMMENDATIONS

**That the Council's off-street parking order is amended for the Town Hall (North Car Park) Zone A Car Park in Appendix A to the following:**

- **Staff Permit Parking Only Monday to Friday.**
- **Public parking at weekend only.**

**Car Parks Zone B (Visitors) and Zone C (South car park) to remain as they currently are.**

## SUPPORT ING INFORMATION

### 1.0 REASONS FOR RECOMMENDATIONS

To ensure that the Council as an organisation, operating from the Town Hall has the appropriate car parking provision that can be managed effectively.

### 2.0 OTHER OPTIONS CONSIDERED

For the parking provision to remain as it is and staff or members to park at the Multi Storey Car Park.

For evening charges to be applied of an evening during the week and the car park to be staff only from 7am-7pm Monday to Friday.

### **3.0 BACKGROUND INFORMATION**

#### **Main Report**

#### **Introduction and Background**

1. On the 10th of July 2019, the Policy, Resources & Economic development Committee amended the parking order relating to the Town Hall site.
2. This was following the redevelopment of the town hall and the asset itself being occupied by multiple users requiring parking provision.
3. The Town hall car parks were zoned and divided as follows:
  - Zone A (The North car park) this is predominantly the staff car park including bays for staff with either health or mobility issues
  - Zone B (the visitors car park) this is a public car park. There are a total of 4 disabled bays for visitors.
  - Zone C (the South Car park) this is for permit holder's car park reserved for businesses, residents, and partners in the building.
4. As the organisations recover from the pandemic, the utilisation of office space by staff and face to face meetings increase. This is putting demand on staff parking in the North Car Park.
5. Staff, visitors, and members have struggled to park in the North Car Park due to the increase in the public in paying to park in the car park. Predominantly it has been noticed that students at the Brentwood Private School are paying to park in the North Car park.

#### **Issue, Options and Analysis of Options**

6. There are a total of 64 spaces in the north car park. Including the disabled bays and electric vehicle charging bays. 3 of these spaces are allocated for Police vehicles and one space is allocated for the Council's enforcement vehicle, with a further space allocated for the Chief Executive. Therefore, 59 spaces remain.
7. The parking team have been enforcing on the car parks at the town hall over a number of weeks. On average there has been 16 spaces that have been



paid to park and 5 vehicles on average that have had Penalty Charge Notices (PCN's) issued for not paying to park in the car park. 21 spaces on average are being utilised by the public.

8. Staff that are carrying out site visits are becoming frustrated that on completing site visits as part of their role they cannot return to the office as there is not a space available.
9. There is an increasing amount of anxiety amongst staff who are worrying about where to park if they cannot find a space in the North Car park.
10. An alternative has been offered to staff, to park at the Multi-Storey Car Park located on Coptfold road. However, staff have to build in extra travelling time throughout the day to travel to and from their car. In addition, the parking team and CCTV team have to man the exit barrier if the ANPR system does not recognise the vehicle registration allocated to permits for Zone A.
11. In addition, staff who then attend evening meetings must move their car back to the Town Hall so that they do not get locked in the MSCP.
12. By changing the car park to a staff only car park Monday to Friday, the space in the car park that are not designated bays can be utilised by staff if they wish to be 'blocked' in. Allowing more staff to park on site. As the car park is a public car park anyone parking out of bay including staff and members with permits will be issued with a PCN.
13. The Council recently introduced a reduced term-time season ticket for King Georges Playing Field. Council Officers will reach out to the school users of the town hall car park to encourage them to take up this alternative offer.

#### **4.0 FINANCIAL IMPLICATIONS**

**Name & Title: Tim Willis, Director – Resources & Section 151 Officer**  
**Tel & Email: 01277 312500 / tim.willis@brentwood.rochford.gov.uk**

There will be an expected loss of income of £16,100. In total the Town Hall Car Park generates approximately £17,400 income per annum. It is expected that the public users however will park elsewhere, utilising the Multi-Storey Car Park and potentially King Georges. Therefore, the loss of income should be less than calculated. Finance will monitor the actual income against the budget and variances will be reported through the budget monitoring updates.

Consulting and changing the parking charges for this site including replacing signage can be covered within existing budgets.

## **5.0 LEGAL IMPLICATIONS**

**Name & Title: Claire Mayhew, Acting Joint Director – People & Governance & Monitoring Officer**

**Tel & Email 01277 312500 / Claire.mayhew@brentwood.rochford.gov.uk**

The Council has powers within an existing legal framework to control parking and formally designate sites within a parking order. The provisions for varying Off Street Parking Orders are set out in the Road Traffic Regulation Act 1984 and the Traffic Management Act 2004. The Council is obliged to formally consult with the County Council and the Police when seeking to vary an existing Parking Order

The Council must have regard to relevant statutory guidance in the exercise of its functions in connection with the control of parking.

## **6.0 RELEVANT RISKS**

- Risk of any changes have been considered. There is a small reputational risk of the Council as an organisation redistributing current public users of the car park.

## **7.0 ENGAGEMENT/CONSULTATION**

This amendment will come into force again once consultation has been completed. Consultation includes advertising the changes in the local paper and then the parking order can be amended and enforced.

## **8.0 EQUALITY IMPLICATIONS**

**Name & Title: Kim Anderson, Corporate Manager – Communities, Leisure and Health**

**Tel & Email 01277 312500 kim.anderson@brentwood.gov.uk**

Public users are able to use the disabled car parking bays currently in the North Car Park. However, these are predominantly used by staff. A review has been undertaken and there is a need to provide 3 additional disabled bays to support staff that are blue badge holders. Public users still can utilise the 5 disabled bays allocated in the other zones at the town hall.

The Council has a duty to promote equality both in service delivery and employment to ensure greater efficiency, effectiveness and fairness to its residents.

## **9.0 ECONOMIC AND CLIMATE IMPLICATIONS**

**Name & Title: Phil Drane, Director – Place**

**Tel & Email 01277 312500 / phil.drane@brentwood.rochford.gov.uk**

There are no direct economic implications. Provision of town centre car parking supports the local economy, but this recommendation does not impact on wider car parking availability. Staff working at the Town Hall have a role to play supporting local businesses. There are no direct environmental or climate implications.

**REPORT AUTHOR:**      **Name:**      Phoebe Barnes  
   **Title:**      Town Hall Car Park  
   **Phone:**      01277 312500  
   **Email:**  
   phoebe.barnes@brentwood.rochford.gov.uk

#### **APPENDICES**

- **Appendix A – Town Hall Car Park Map.**

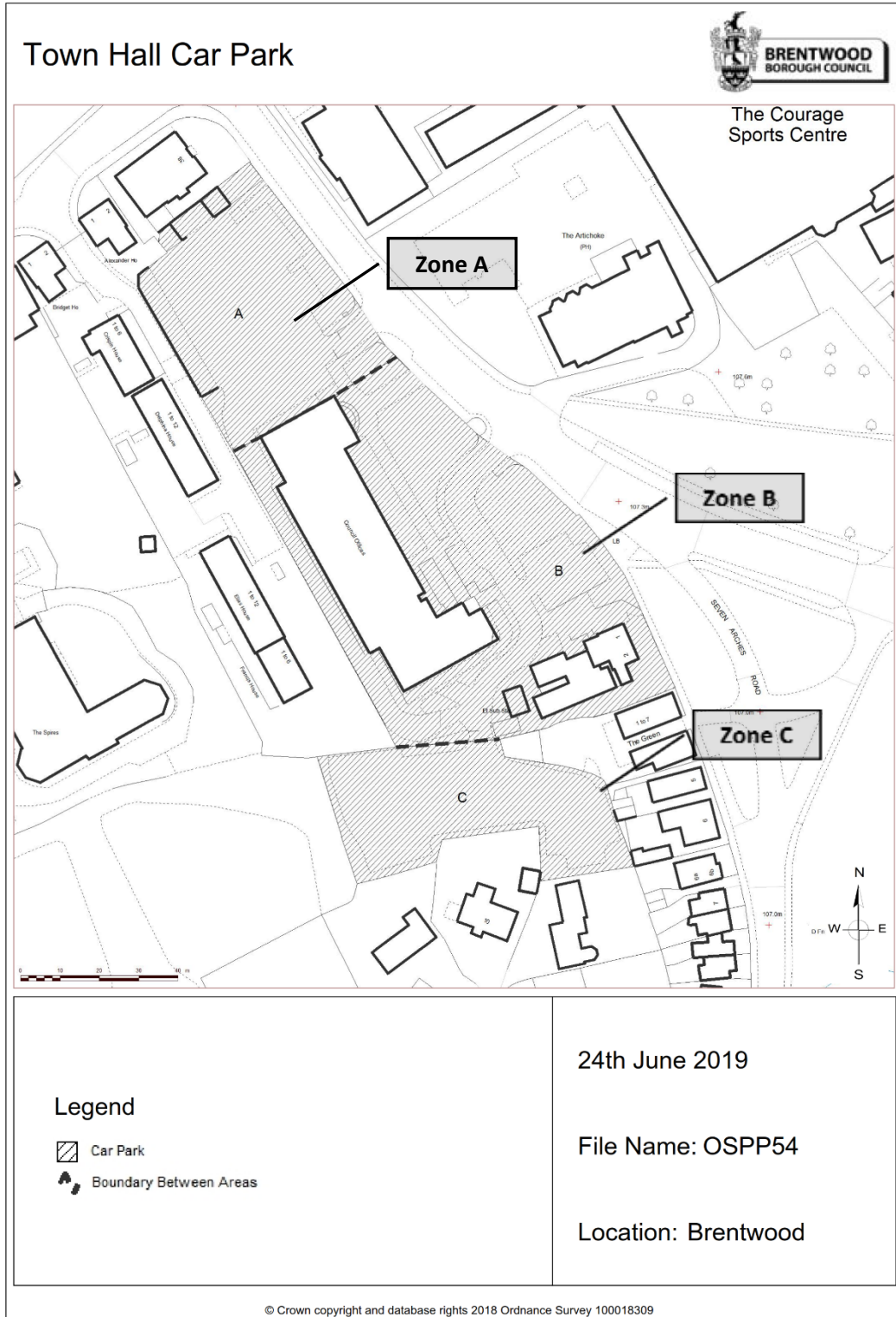
#### **BACKGROUND PAPERS**

- None

This page is intentionally left blank

Town Hall Car Park

Showing Amended boundary and Zones



This page is intentionally left blank