

Merton Council Overview and Scrutiny Commission



Date: 14 December 2016

Time: 7.15 pm

Venue: Committee rooms D & E - Merton Civic Centre, London Road, Morden SM4 5DX

AGENDA

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| 1 | Apologies for absence | |
| 2 | Declarations of pecuniary interest | |
| 3 | Call-in of the introduction of a diesel surcharge for all types of resident and business parking permits | 1 - 118 |

**This is a public meeting – members of the public are very welcome to attend.
The meeting room will be open to members of the public from 7.00 p.m.**

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Overview and Scrutiny Commission membership

Councillors:

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Peter McCabe
Mike Brunt
John Dehaney
Abigail Jones
Sally Kenny
Dennis Pearce
Oonagh Moulton
David Williams
John Bowcott

Substitute Members:

Michael Bull
Agatha Mary Akyigyina
John Sargeant
Joan Henry
Najeeb Latif

Co-opted Representatives

Helen Forbes, Parent Governor
Representative - Secondary and Special
Sector
Geoffrey Newman (Co-opted member,
non-voting)

Note on declarations of interest

Members are advised to declare any Disclosable Pecuniary Interest in any matter to be considered at the meeting. If a pecuniary interest is declared they should withdraw from the meeting room during the whole of the consideration of that matter and must not participate in any vote on that matter. If members consider they should not participate because of a non-pecuniary interest which may give rise to a perception of bias, they should declare this, withdraw and not participate in consideration of the item. For further advice please speak with the Assistant Director of Corporate Governance.

What is Overview and Scrutiny?

Overview and Scrutiny describes the way Merton's scrutiny councillors hold the Council's Executive (the Cabinet) to account to make sure that they take the right decisions for the Borough. Scrutiny panels also carry out reviews of Council services or issues to identify ways the Council can improve or develop new policy to meet the needs of local people. From May 2008, the Overview & Scrutiny Commission and Panels have been restructured and the Panels renamed to reflect the Local Area Agreement strategic themes.

Scrutiny's work falls into four broad areas:

- ⇒ **Call-in:** If three (non-executive) councillors feel that a decision made by the Cabinet is inappropriate they can 'call the decision in' after it has been made to prevent the decision taking immediate effect. They can then interview the Cabinet Member or Council Officers and make recommendations to the decision-maker suggesting improvements.
- ⇒ **Policy Reviews:** The panels carry out detailed, evidence-based assessments of Council services or issues that affect the lives of local people. At the end of the review the panels issue a report setting out their findings and recommendations for improvement and present it to Cabinet and other partner agencies. During the reviews, panels will gather information, evidence and opinions from Council officers, external bodies and organisations and members of the public to help them understand the key issues relating to the review topic.
- ⇒ **One-Off Reviews:** Panels often want to have a quick, one-off review of a topic and will ask Council officers to come and speak to them about a particular service or issue before making recommendations to the Cabinet.
- ⇒ **Scrutiny of Council Documents:** Panels also examine key Council documents, such as the budget, the Business Plan and the Best Value Performance Plan.

Scrutiny panels need the help of local people, partners and community groups to make sure that Merton delivers effective services. If you think there is something that scrutiny should look at, or have views on current reviews being carried out by scrutiny, let us know.

For more information, please contact the Scrutiny Team on 020 8545 3864 or by e-mail on scrutiny@merton.gov.uk. Alternatively, visit www.merton.gov.uk/scrutiny

Committee: Overview and Scrutiny Commission

Date: 14 December 2016

Wards: All

Subject: Call-in of the introduction of a diesel surcharge for all types of resident and business parking permits

Lead officer: Chris Lee, Director of Environment and Regeneration

Lead member: Councillor Ross Garrod, Cabinet Member for Street Cleanliness and Parking

Contact officer: John Hill, Paul Walshe and Jason Andrews

Recommendations:

- A. That the Overview and Scrutiny Commission consider the information provided in response to the call-in request and decide whether to:
- Refer the decision back to Cabinet for reconsideration; or
 - Determine that the matter is contrary to the policy and/or budget framework and refer the matter to Full Council; or
 - Decide not to refer the matter back to Cabinet, in which case the decision shall take effect immediately.
-

1 PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1. This report provides a response to the points raised in the call-in request relating to the decision taken by Cabinet Member on 7 November 2016.

2 DETAILS

- 2.1. The call-in request and documents provided in response to this are appended to this report.

3 ALTERNATIVE OPTIONS

- 3.1. The Council's constitution requires the Commission to select one of the options listed in recommendation A.

4 CONSULTATION UNDERTAKEN OR PROPOSED

- 4.1. None for the purposes of this covering report.

5 TIMETABLE

- 5.1. None for the purposes of this covering report.

6 FINANCIAL, RESOURCE AND PROPERTY IMPLICATIONS

- 6.1. None for the purposes of this covering report.

7 LEGAL AND STATUTORY IMPLICATIONS

- 7.1. The Council's constitution requires the Commission to select one of the options listed in recommendation A.

- 8 HUMAN RIGHTS, EQUALITIES AND COMMUNITY COHESION IMPLICATIONS**
- 8.1. None for the purposes of this covering report.
- 9 CRIME AND DISORDER IMPLICATIONS**
- 9.1. None for the purposes of this covering report.
- 10 RISK MANAGEMENT AND HEALTH AND SAFETY IMPLICATIONS**
- 10.1. None for the purposes of this covering report.
- 11 APPENDICES – THE FOLLOWING DOCUMENTS ARE TO BE PUBLISHED WITH THIS REPORT AND FORM PART OF THE REPORT**
- Appendix A: report received by Cabinet, 14 November 2016
 - Appendix B: call-in request form
 - Appendix C: officers' response to the call-in
 - Appendix D: submission from Councillor John Sargeant, 5.12.16
 - Appendix E: submission from the Alliance of British Drivers, 3.12.16
- 12 BACKGROUND PAPERS**
- 12.1. None for the purposes of this covering report.

Committee: Cabinet

Date: 07 November 2016

Wards: All

Subject: The introduction of a diesel surcharge for all types of resident and business parking permits

Lead officer: John Hill

Lead member: Councillor Ross Garrod (Cabinet Member for Street Cleanliness and Parking)

Contact officers: John Hill, Paul Walshe and Jason Andrews.

Recommendations:

1. That Cabinet consider the introduction of a levy charge for all diesel vehicles that have a Resident, Business or Trade parking permit with the introduction phased over a period of 3 year period based on one of the following two options:
 - a) £150 surcharge with a phased introduction in 2017/18/19/20 as follows; £100 in 2017/18, £125 in 2018/19 and £150 2019/20.
 - or
 - b) £150 surcharge with a phased introduction in 2017/18/19/20 as follows; £90 in 2017/18, £115 in 2018/19 and £150 in 2019/20.
 2. That Cabinet considers setting the parking permit charge for electric vehicles at a discounted rate of £25 per annum.
 3. That the Council reviews the impact of the diesel surcharge for a period of 2 years, with a view to the introduction of comprehensive emissions based parking scheme.
-

1 PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 To consider the introduction of a diesel surcharge to highlight the disproportionate impact these vehicles have upon local air quality and poor health.

2 DETAILS

- 2.1. Air pollution is increasingly recognised as a major cause of ill health and premature death. The most recent report by The Royal College of Physicians 'Every breath we take: the lifelong impact of air pollution' says that each year in the UK, around 40,000 deaths are attributable to exposure to outdoor air pollution.
- 2.2. Air pollution plays a role in many of the major health challenges of our day, and has been linked to cancer, asthma, stroke and heart disease, diabetes, obesity, and changes linked to dementia.
- 2.3. Neither the concentration limits set by government, nor the World Health Organisation's air quality guidelines, define levels of exposure that are entirely safe for the whole population.

- 2.4. Research by King's College London has estimated that air pollution was responsible for up to 141,000 life years lost, or the equivalent of up to 9,400 deaths in London in 2010, as well as over 3,400 hospital admissions. The total economic cost associated with this was estimated at £3.7 billion.
- 2.5. In recognition of this impact, local authorities are considering what steps it can take challenge poor air quality.
- 2.6. One of the few direct controls that a local authority has to influence change in vehicle choice is through its parking permit system. Many local authorities have been running emissions based parking schemes for a number of years; however these have mainly focused on CO₂ (carbon dioxide) emissions rather than local health based pollutants like nitrogen dioxide and particulate matter. Therefore, some have placed an additional surcharge upon diesel vehicles in recognition of the impact of these particular vehicles.
- 2.7. The overall aim of the scheme is to influence residents and business users to consider changing to lower or zero emission vehicles with any revenue derived from the scheme reinvested to support local sustainable transport initiatives and necessary infrastructure. Successful introduction of this type of scheme demonstrates the local authority's commitment to reducing emissions and improving air quality towards national objectives.
- 2.8. It is very difficult to define at what level a surcharge will directly influence a motorists behaviour as this decision is based upon a number of personal factors including, but not limited to; age of the vehicle, time of renewal, personal preference, family makeup and fuel economy.
- 2.9. The proposed low emissions parking levy, if adopted, would provide the Council with an opportunity to raise resident's awareness of the impact of emissions from their vehicles on local air quality and could provide an effective prompt to those considering changing their vehicle. It also adopts the long standing principle that the Polluter Pays' something that is not recognised in our current scheme.
- 2.10. Merton's parking permit fees have remained relatively unchanged and does not currently represent the specific impact of certain types of vehicle, or the impact of local pollutants that are of concern to health.
- 2.11. The Councils Pollution Team in conjunction with a leading transport research consultant has looked at the vehicle make-up in the borough, and concluded that in Merton, as with many other Boroughs, diesel vehicles contribute disproportionately to local air quality emissions. Crucially, the Merton study was based on data associated with actual on-road emissions as opposed to the manufacturers' specification.
- 2.12. It is true that diesel owners have, in the past, been given conflicting information as to the emissions from their vehicles and this has not helped by the recent manufacturers' vehicle testing scandals. Nonetheless, there is now conclusive evidence to show that diesel vehicles produce a disproportionate amount of harmful pollutants that pose a risk to health. To minimise this risk it is recommended that the Council introduces an emissions levy to encourage owners to switch to less polluting vehicles.

- 2.13. Officers recommend that the Council review its parking permit charges and include a levy for those vehicles that disproportionately contribute to poor air quality and health.
- 2.14. Officers recommend a levy charge for all diesel vehicles that have a Resident, Business or Trade parking permit are phased over a period of 3 years under one of the following two options:
- a) £150 surcharge with a phased introduction in 2017/18/19/20 as follows; £90 in 2017/18, £115 in 2018/19 and £150 2019/20.
 - b) £150 surcharge with a phased introduction in 2017/18/19/20 as follows; £100 in 2017/18, £125 in 2018/19 and £150 in 2019/20

3 ALTERNATIVE OPTIONS

- 3.1. Parking permit scheme to remain unchanged.
- 3.2. Adoption of a more thorough and complete emissions system taking into consideration petrol vehicles.

4 CONSULTATION UNDERTAKEN OR PROPOSED

- 4.1. Depending on the accepted recommendation, a full consultation with residents and partners to seek views and opinions is proposed
- 4.2. The report was presented to the Sustainable Communities Overview & Scrutiny Panel meeting on the 7th September as an item for pre-decision scrutiny. At that meeting Members were asked to comment on the principle of imposing a levy on the most polluting vehicles through a differentiated cost for resident parking permits for diesel vehicles. Additionally, they were asked to comment on the level of the levy to be applied.
- 4.3. There was consensus amongst members of the O&S Panel in supporting the principle of a diesel levy in recognition of the seriousness of the air quality issue in Merton and diesel vehicles being the most polluting. Members also agreed that there is need for officers to give further consideration to how the diesel levy is going to be communicated; members expressed their concern about residents not being given sufficient notice (of at least a year) so they have a chance to change their behaviour before the levy is imposed. Members asked that more should be understood about the imposition of similar policies by other London boroughs, the variation and the extent to which these have and haven't been successful.
- 4.4. The precise value of the levy to be imposed was not discussed in detail. However, there was disagreement amongst members about the recommendation that parking permits should be free for electric cars. Some thought that given the costs of setting up Controlled Parking Zones, especially where these feature charging points for electric cars, then there should be a charge for parking permits for electric cars. However, others thought more should be done to promote the use of electric cars for which making parking permits free would be one option. It was explained to members that differentiated charging based on engine type is not considered appropriate given it isn't possible to rely on manufacturer specifications. It

was suggested that officers consider a differentiated cost for parking permits where households have more than one vehicle. Members also requested that officers to consider other options to address pollution from diesel vehicles that currently aren't parked within Controlled Parking Zones.

5 TIMETABLE

- 5.1. Consideration of report at E&R Departmental Management Team – August 24th 2016.
- 5.2. Consideration of report at Overview & Scrutiny Panel – September 7th 2016 (see 4.2 - 4.4 above).
- 5.3. Consideration of report at Leader's Strategy Group – 7th November 2016
- 5.4. Consideration of report at Cabinet – 14th November 2016

6 FINANCIAL, RESOURCE AND PROPERTY IMPLICATIONS

- 6.1. Attached appendix 2 provides information on the financial implications of the levy charge.
- 6.2. The Council, subject to the outcome of any consultation process, can introduce a change to the borough wide permit traffic management order. The purpose of the surcharge is to reduce the demand for resident and business permits for diesel vehicles.

Three London Councils have successfully introduced a surcharge for parking permits issued to diesel powered vehicles which is in addition to the existing parking permit charges.

LB of Islington	£96 per parking permit
LB of Kensington and Chelsea	£19 per parking permit
LB of Camden	£10 per parking permit

It's important to note that the charges of £10 & £19 levied by Camden and K&C is only an addition to an existing wider charging system emissions based levy which recognises the impact of diesels.

7 LEGAL AND STATUTORY IMPLICATIONS

- 7.1 The key legal framework for allowing for parking operation and enforcement duties comes under the road traffic regulation act 1984 and road traffic act 1991. Designation of parking is achieved through traffic regulation orders.

- 7.2 The road traffic act 1991 provides local authorities with the power to enforce parking activities themselves rather than the police (i.e. decriminalising parking enforcement). Under these powers, local authorities can issue fines or parking tickets. Under sections 45 and 46 of the Road Traffic Regulation Act 1984, councils can designate parking places on the highway, to charge for parking in these places and to make a charge for parking permits for their use. Local Authorities can also introduce differential permit charges between vehicles of different classes based on factors including their level and type of emissions.
- 7.3 In London, local authorities must also have regard to the Mayor of London's Transport Strategy (sections 142 and 144(1)(a) Greater London Authority Act 1999) which emphasises the importance of reducing emissions and improving air quality.
- 7.4 When setting parking charges Local Authorities are entitled to use the tariff or an increase in charges as a legitimate tool in managing demand for all types of resident and business parking permits for diesel powered vehicles. This is particularly relevant as it is the Councils aim to reduce residents and businesses reliance on diesel powered vehicles leading to a reduction in pollution as part of the Councils aim to reduce congestion and associated pollution. This in turn will contribute to the Councils 2020 aims.

8 HUMAN RIGHTS, EQUALITIES AND COMMUNITY COHESION IMPLICATIONS

- 8.1. None

9 CRIME AND DISORDER IMPLICATIONS

- 9.1. None

10 RISK MANAGEMENT AND HEALTH AND SAFETY IMPLICATIONS

- 10.1. None

11 APPENDICES – THE FOLLOWING DOCUMENTS ARE TO BE PUBLISHED WITH THIS REPORT AND FORM PART OF THE REPORT

- Appendix 1: Introduction of an emissions based parking levy: Prepared by Transport & Travel Research Ltd., in partnership with LB Merton.
- Appendix 2: Schedule of options for proposed levy charges.

12 BACKGROUND PAPERS

- 12.1. None

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London Borough Merton:

Introduction of an Emissions Based Parking Levy – Diesel Vehicles

Proposal

Prepared in partnership with
London Borough of Merton

By:



Author(s)	Lisa Hawtin, Kevin Turpin, Anna Savage & Jason Andrews
Quality Control	Venn Chesterton & Jason Andrews
Version	v.10
Date	1st of August 2016
Last edited	20 th of August 2016

This proposal has been prepared in partnership with London Borough of Merton. Transport & Travel Research Ltd cannot accept any responsibility for any use of or reliance on the contents of the report by any third party.



1 EXECUTIVE SUMMARY

Air pollution is increasingly recognised as a major cause of ill health and premature death. The most recent report by The Royal College of Physicians 'Every breath we take: the lifelong impact of air pollution' (February 2016)¹ says that:

- Each year in the UK, around 40,000 deaths are attributable to exposure to outdoor air pollution.
- Air pollution plays a role in many of the major health challenges of our day, and has been linked to cancer, asthma, stroke and heart disease, diabetes, obesity, and changes linked to dementia.
- Neither the concentration limits set by government, nor the World Health Organisation's air quality guidelines, define levels of exposure that are entirely safe for the whole population.

Research by King's College London has estimated that air pollution was responsible for up to 141,000 life years lost, or the equivalent of up to 9,400 deaths in London in 2010, as well as over 3,400 hospital admissions. The total economic cost associated with this was estimated at £3.7 billion.

It is therefore the responsibility for Government, both locally and nationally to take steps to tackle the issue of air quality as well as highlight the impact of pollution.

Along with other Boroughs such as Islington, Camden, Kensington & Chelsea. Merton are considering introducing a residential parking scheme that takes into account vehicle emissions and will place additional charges on those vehicles that contribute disproportionately to poor air quality.

As part the Council's commitment to Air Quality, this study has been commissioned to consider the impacts of introducing an emissions based parking levy for both residential and business parking permits. This scheme would aim to encourage residents and businesses to consider changing to low or zero emission vehicles with revenue derived from the scheme invested to support local sustainable transport initiatives and necessary infrastructure.

The approach for a low emission based parking scheme considered in this study takes into account on-road emissions, rather than simply the manufacturing specification. As this report will show, diesel cars may have low fuel consumption and low CO₂ emissions but produce disproportionately high emissions of local air quality pollutants, such as nitrogen oxides (NO_x) and particulates (PM's).

The study has proposed implementation of an annual parking permit surcharge for all diesel vehicles; no surcharge for petrol vehicles and a free parking arrangement for all 'plug-in' electric and petrol hybrid vehicles.

The objective of imposing a diesel surcharge for parking within the Borough is to make resident's aware of the impact of diesel vehicles on local air quality, and to incentivise those changing their vehicles to consider adopting lower or zero emission technologies. The exemption for petrol vehicles is a recognition that the emissions of Particulate Matter (PM₁₀/PM_{2.5}) and nitrogen dioxide (NO₂) are generally less significant when compared to diesel, and provide a readily available, low cost option for those resident's that are currently unable to make the transition straight to zero emissions technologies.

The rate of the surcharge for diesel vehicles will need to be considered very carefully; this must provide a sufficient incentive to promote long term change as well as come into line with other boroughs, whilst not be seen as punitive to diesel drivers that have been given conflicting advice over the years around diesel emissions.

¹ Royal College of Physicians – Working Party Report (February 2016) <https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution>

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2 BACKGROUND TO THE MERTON AIR QUALITY PARKING PROJECT

Air quality in the London Borough of Merton remains an important public health issue. In 2013, 6.4% of deaths within the borough are considered 'likely' to be attributable to air pollution under the Public Health Outcomes Framework 3.01⁶. The Air Quality Action Plan (AQAP)⁷ developed by the Council as part of their Local Air Quality Management (LAQM) responsibilities has been in place since 2003, but despite half of the 32 action plan measures having been implemented, pollution concentrations in parts of the borough remain in exceedance of the UK air quality objectives for nitrogen dioxide (NO₂). The whole borough of Merton has been declared an Air Quality Management Borough (AQMA) for NO₂ and particulates (PM₁₀).

In London, and other urban areas, attempts to address air pollution have been counteracted by continued growth in traffic, the increase in the proportion of diesel in the passenger vehicle fleet and the poor performance of vehicle emission reduction measures under real world driving conditions. The combination of these factors has meant that reducing pollution levels within AQMAs remains a challenge for many local authorities.

The revised Defra UK Air Quality Plan (2015) details the Government's plan for achieving the European Union (EU) air quality limit values for NO₂ in the UK. It was produced largely in response to the EU infringement proceedings for non-compliance with limit values and sets out targeted local, regional and national measures for reducing NO₂ in towns and cities across the UK. Defra's Air Quality Plan reinforces the requirement for local authorities to focus strongly on local actions to address the problem not only to comply with the UK's legal obligations but fundamentally to protect the health of its residents.

The measures necessary to improve air quality are multifaceted requiring a combination of improvements in vehicle technology and testing regimes but also the means to encourage individuals and businesses to make long term changes to their transport choices. To generate further improvements in air quality the focus needs to be on reducing vehicle miles, improving individual vehicle emissions and incentivising modal shift to public transport and active travel options. To instigate these changes it is generally accepted that there needs to be a combination of incentives and penalties to encourage movement away from higher pollution transport options to more sustainable/ low emission options.

In Merton a range of measures to influence transport choices have been initiated through the AQAP. This study considers whether the introduction of an emissions based parking levy for residential and business permit holders would be an effective means of incentivising the uptake of low or zero emission vehicles and stimulating more residents to switch to public/shared transport and active travel, such as walking and cycling, as an alternative to private car ownership. To do this, charging level of the permits would be based on vehicle emissions with the most polluting vehicles being charged at a higher rate, following the 'polluter pays' principle. Vehicle owners with zero emission cars would benefit by being exempt.

The overall aim of the scheme is to influence residents and business users to consider changing to low or zero emission cars with any revenue derived from the scheme reinvested to support local sustainable transport initiatives and necessary infrastructure. Successful introduction of this type of scheme demonstrates the local authority's commitment to reducing emissions and improving air quality towards national objectives.

⁶ Public Health England – Public Health Outcomes Framework – Merton data <http://www.nepho.org.uk/pdfs/public-health-outcomes-framework/E09000024.pdf>

⁷ London Borough of Merton AQ Action Plan Progress Report 2014 http://www.merton.gov.uk/merton_2014_progress_draft.pdf³ Defra 'Improving air quality in the UK Tackling nitrogen dioxide in our towns and cities' UK overview document December 2015 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/486636/air-quality-plan-2015-overview-document.pdf

3 THE CASE FOR RESIDENTIAL EMISSIONS BASED PARKING LEVIES

3.1 Scope of the project

Exhaust emissions from vehicles are dependent on many factors including the age (and Euro emission standard), type of vehicle, size of engine and fuel type. Emissions will vary according to the speed that the vehicle is driven at and these can be represented by average speed emission factors to compare emissions from the vehicle fleet. In the UK, the recognised emission factors are from the European Environment Agency from their COPERT 4 model (v10).

Error! Reference source not found., Figure 2 and Figure 3 show annualised NO_x, PM₁₀ and CO₂ emissions respectively, from a fleet of vehicles made entirely of diesel cars versus one made entirely of petrol cars (the age of the fleet and Euro standards are from the NAEI - National Atmospheric Emissions Inventory for London in 2016). These graphs show that NO_x emissions from diesel cars are much higher than from petrol cars, particularly at very low or very high speeds. PM₁₀ emissions are less speed dependent but are also higher from diesels, whereas CO₂ emissions show a similar relationship with speed for both fuel type although are slightly higher from petrol cars.

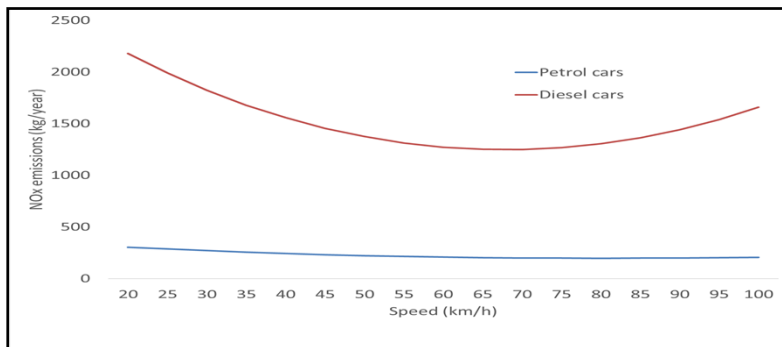


Figure 1: Speed related NO_x emissions, petrol Vs diesel cars in London, 2016

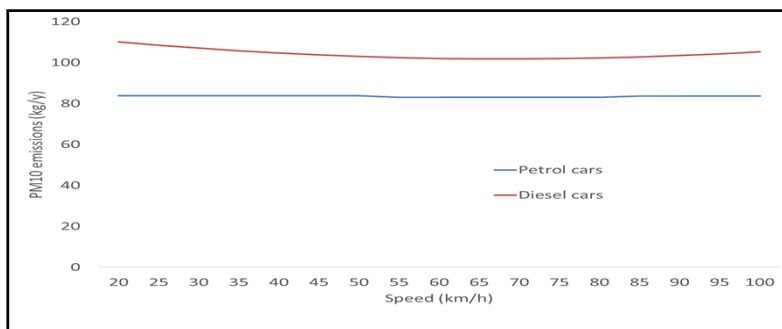


Figure 2: Speed related PM₁₀ emissions, petrol Vs diesel cars in London, 2016

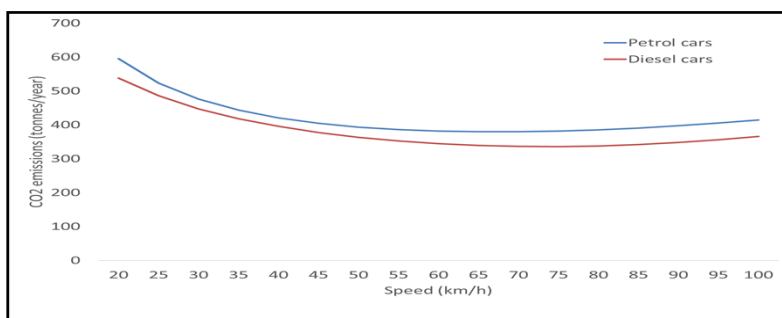


Figure 3: Speed related CO₂ emissions, petrol Vs diesel cars in London, 2016

London Borough of Merton: Air Quality & Parking Project

By comparing more localised and refined data from the London Atmospheric Emissions Inventory (LAEI), the contribution by vehicle type to emissions is illustrated for Merton in Table 1.

Table 1: Annualised emissions for 2015 from the LAEI in Merton in tonnes per year

Vehicle type	Emissions (t/y)		
	CO2	NOx	PM10 exhaust
Motorcycle	1395.7	1.4	0.1
Taxi	1976.6	7.4	0.3
Petrol Car	48566.8	30.1	0.6
Diesel Car	42063.4	141.2	3.3
Petrol LGV	522.9	0.8	0.0
Diesel LGV	13971.1	49.0	1.6
London Bus	8745.4	49.6	0.3
Coach	3100.4	21.7	0.2
Rigid HGV	11484.7	63.6	0.4
Articulated HGV	3396.4	13.8	0.1

This data shows that the highest emissions are from cars which reflect their dominance in the vehicle fleet. For CO₂ emissions, there is a similar contribution from both petrol and diesel cars (around 30-35% each). The next highest contribution is from diesel light goods vans (LGVs) and diesel rigid Heavy Goods Vehicles (HGVs). **For NO_x and PM₁₀ exhaust emissions, it is the diesel cars that dominate emissions.**

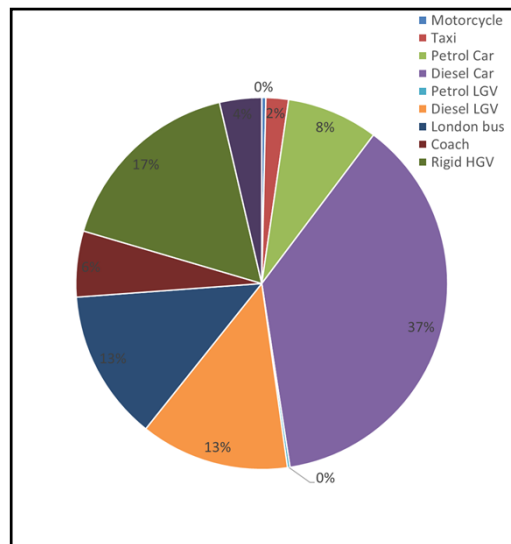


Figure 4: Annual NO_x emissions by vehicle type in Merton, 2015

Based on the findings from this data, the study focuses on a way to use parking controls as a mechanism to reduce the contribution of cars on local emissions. The scope of this study is therefore to primarily investigate introducing an emissions based parking levy for residential parking permits within Merton with an additional consideration of changing the levies for business parking permits.

The study models the effect of introducing a parking levy on residential permits for all diesel vehicles whilst offering free parking permits for all 'plug-in' or other zero emission technologies. The parking charge for petrol vehicles has been held level in the first phase to acknowledge that there is currently insufficient infrastructure to support a mass transition to electric vehicles and that petrol vehicles are generally less polluting in terms of NO₂, PM₁₀ and PM_{2.5} than diesel-fuelled vehicles.

There is scope to consider further differentiation of petrol vehicle emissions by applying different banding systems based on emissions and to consider their likely impacts on local air quality pollutants and CO₂ emissions. This method could be applied to future scenarios to encourage further transition to zero emission vehicles and as the local infrastructure expands to meet future demand. There is a

growing body of evidence suggesting that parking management in regulated car parks and on-street can be applied to create more balanced choices between alternative modes of transport⁸. The RAC has recognised the impact of inefficient parking on congestion and vehicle emissions and has called for better provision of information to ensure efficient vehicle parking, and a more consistent approach to pricing, both to cover the direct costs of parking and as a tool to manage congestion⁹. Parking management can also be used to encourage less-polluting vehicles, by means of establishing priority or dedicated parking, or reduced charges for zero or low emission vehicles. Examples of such policies already implemented in the UK include designated parking for electric vehicles, car-club vehicles and car-share vehicles, or lower parking charges for vehicles that meet a specific emission standard. This kind of scheme represents an alternative to a formal LEZ, and can potentially be enforced more easily through existing parking enforcement powers.

There a number of local authorities that have introduced emissions based charging structure for residential parking, based on CO₂ emissions. Some of these are used to encourage owners to purchase a low or zero emission vehicle by offering a discount to these only (e.g. Milton Keynes, Richmond, Westminster and York), whilst others have introduced a banding system where charges vary based on engine size and/or emissions. The aim of all these schemes are to encourage residents to consider the effect their vehicle has on emissions and effect a behavioural change, i.e. by moving to lower emission vehicles or those with smaller engine sizes.

In London, there are a large number of boroughs that have already introduced differential charges based on emissions, including;

Islington – In 2010, the Council introduced 13 bands based on engine size for older vehicles or CO₂ emissions (based on the Driver Vehicle Licensing Agency, DVLA’s vehicle excise duty, VED bands) for newer vehicles. From 2015, a £96 surcharge was added to diesel vehicles with various exemptions applied. The maximum annual residential parking charge is currently £540 (see summary of annual charges in

Band	Pre-2011 (engine size)	vehiclePost (CO2 g/km)	2011Petrol alternative fuelled cars	orDiesel cars
A	Electric	0-100	Free	N/A
B	1-900	101-110	£15.90	£111.90
C	901-110	111-120	£28.70	£124.70
D	1101-1200	121-130	£75.80	£171.80
E	1201-1300	131-140	£92.15	£188.15
F	1301-1399	141-150	£99.30	£195.30
G	1400-1500	151-165	£123.90	£219.90
H	1501-1650	166-175	£142.50	£238.50
I	1651-1850	176-185	£167.00	£263.00
J	1851-2100	186-200	£211.00	£307.00
K	2101-2500	501-225	£246.00	£342.00
L	2501-2750	226-255	£344.00	£440.00
M	>2751	<256	£444.00	£540.00

Table 2).
- **Camden** – Camden was one of the first boroughs

to introduce this type of scheme in 2007. There are 4 charging bands for older vehicles (before 2001) based on engine size and 4 bands for newer vehicles (after 2001) based on CO₂ emissions with a maximum annual charge of around £270. There is also a diesel surcharge of £10 per vehicle and an additional charge for second or

third car.

- **Kensington and Chelsea** – From 2014, there have been 9 charging bands with a £19 annual surcharge for diesel vehicles. The maximum annual charge for a single owned vehicle is £231. Higher charges are applied for multiple vehicles.

Band	Pre-2011 vehicle (engine size)	Post 2011 (CO ₂ g/km)	Petrol or alternative fuelled cars	Diesel cars
A	Electric	0-100	Free	N/A
B	1-900	101-110	£15.90	£111.90
C	901-110	111-120	£28.70	£124.70
D	1101-1200	121-130	£75.80	£171.80
E	1201-1300	131-140	£92.15	£188.15
F	1301-1399	141-150	£99.30	£195.30
G	1400-1500	151-165	£123.90	£219.90
H	1501-1650	166-175	£142.50	£238.50
I	1651-1850	176-185	£167.00	£263.00
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L	2501-2750	226-255	£344.00	£440.00
M	>2751	<256	£444.00	£540.00

Table 2: Example of an emissions banding residential permit system in Islington (annual charges)

Information from Islington has showed that there has been an increase in the number of lower emission vehicles (Bands A and B) from 6.3% to 13.5% and a decline in the highest banded vehicles (Bands L and M) from 9.2% to 6.7% in the last 7 years (see Figure 5).

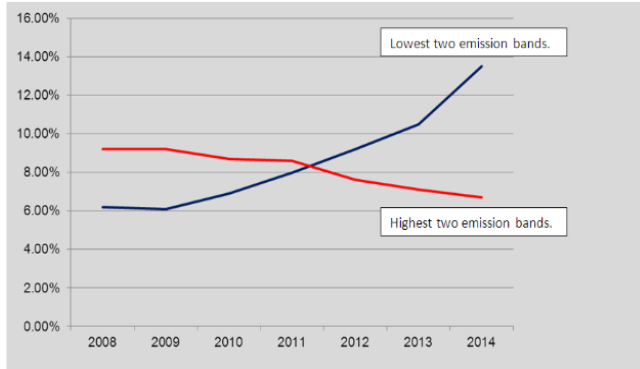


Figure 5: Change in proportion of lowest and highest banded vehicles with residential parking permits in Islington¹⁰

3.2 Current Permit Charges

Vehicle type	Diesel	Electric diesel	Electricity	Gas fuel	Duel	Hybrid electric	Petrol	Grand Total
Motorcycle							5	5
Car	4,731	12	5	14		237	9,274	14,273
Car Van	132						6	138
Van	264			2			20	286
HDV	1							1
Grand Total	5,128	12	5	16		237	9,305	14,703

In Merton, currently an annual residential parking permit costs £65 for the first car, £110 for the second car and £140 for a third car to renew (or half the cost for 6 months). Households can also purchase a single permit for more than one car as long as only one is on the road at one time. Parking permits are provided for specific zones, with some permits applicable to more than one parking zone. There is currently a one off £25 administration fee to purchase a new permit. The Council provided a list of the vehicle registration plates of these vehicles with information on whether the vehicle is the first, second or third or more car.

There are 15,074 unique residential parking permits in Merton. The vehicle registration numbers of these vehicles were sent to the Department for Transport (DfT) to obtain details from the DVLA database on vehicle make and model, fuel type, engine size or gross weight and date of first registration. 371 vehicles could not be matched to the DVLA database. It is likely that these were foreign or diplomatic vehicles, or perhaps that the registration had been recorded incorrectly or an error had been made.

A summary of the matched vehicles by vehicle type is given in Table 3. It can be seen that as expected, the vast majority of residential permits are allocated to cars (97%). Additional information on these vehicles in terms of fuel type is given in Table 4. This data showed that of these vehicles, 63% are petrol and 35% diesel fuelled as illustrated in Figure .

Table 3: Residents parking permits: Vehicles identified from number plate details in Merton, 2015

Vehicle type	Number
Motorcycle	5
Car	14,273
Car Van	138
Van	286
Heavy duty vehicle	1
Grand Total	14,703

Table 4: Residents parking permits: Vehicle split by fuel type

¹⁰ <http://democracy.islington.gov.uk/documents/s3051/Diesel%20Surcharge%20on%20Permits%20Executive%20January%202015.pdf>

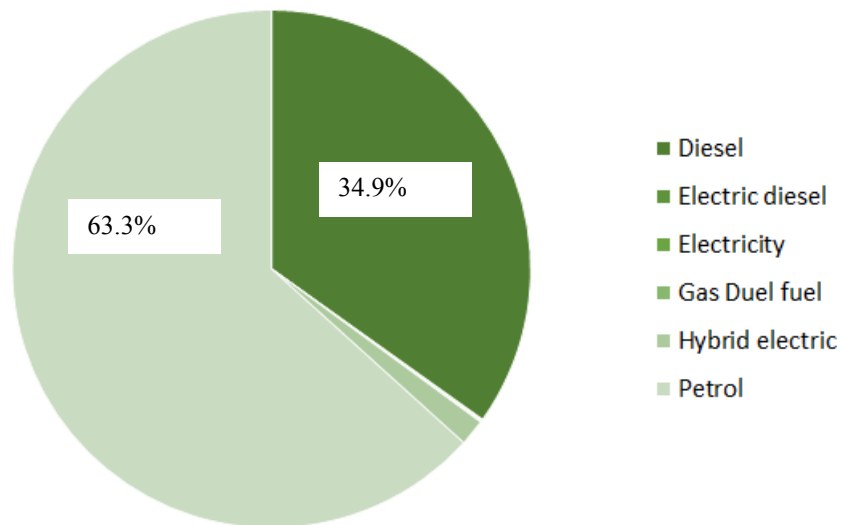


Figure 6: Residents parking permits: The percentage split of fuel use

The study further analysed this data to derive the vehicle’s Euro emission standard. This was determined based on a number of parameters including vehicle type, engine size and date of first registration. This information is presented in Figure 7 for petrol vehicles and Figure 8 for diesel vehicles. The data shows that the majority of petrol vehicles are made up of cars, and these are mainly of Euro 4 standard (i.e approximately 10 years old), with also a high number of Euro 3 (>15 years old) and Euro 5 vehicles (around 5 years old). There are fewer older petrol vehicles (ie. Pre-Euro 2 more than 20 years old) and few of the newest Euro 6 vehicles (vehicles registered after 2014). The diesel fleet was generally newer, with the highest number of Euro 5 vehicles (from 2011) which reflects the recent shift to purchase diesels. The reasons for this may be due to the fact that diesel vehicles have lower CO₂ emissions and have been incentivised by the government through schemes such as discounted car tax to reflect this.

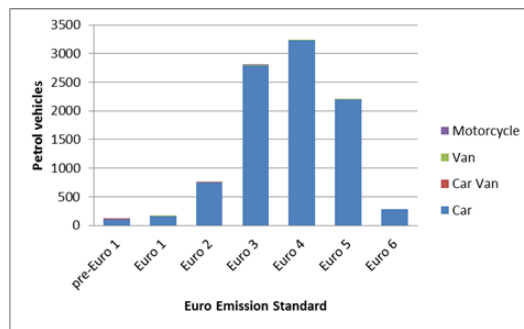


Figure 7: Residents parking permits: Number of petrol vehicles by Euro Standard

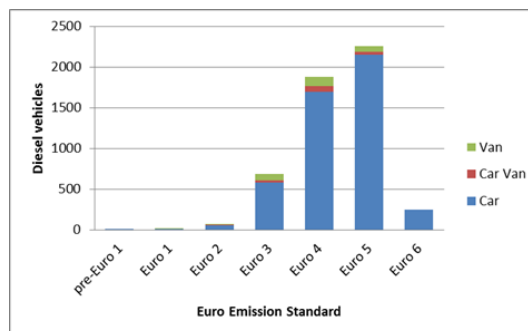


Figure 8: Residents parking permits: Number of diesel vehicles by Euro Standard

3.3 Parking levy options

Based on this data, this study has considered the impact of vehicle emissions in Merton that accounts for both direct and indirect air pollution impacts resulting from vehicle use, i.e. the direct local exposure to NO₂ and particulates and the indirect climatic effects caused by CO₂. This is in contrast to the majority of existing low emission parking schemes which are primarily based on CO₂ emissions or fuel consumption alone.

Recent evidence has shown that some diesel vehicles have very low fuel consumption and hence low CO₂ emissions for a given journey but they produce disproportional emissions such as NO_x and particulates. More so recent evidence is emerging that regulated emissions from certain vehicles on the road are possibly higher than vehicle manufactured specifications suggest. For example, findings from the International Council on Clean Transportation (ICCT) showed that modern diesel cars have low on-road emissions of carbon monoxide and hydrocarbons but unsatisfactory emissions of real world NO_x and PM emissions. Their report showed that the average on-road emissions of NO_x were 7 times the certified emission limit for Euro 6 diesel vehicles and that there was a significant range between the vehicles tested (ICCT, 2014). The reasons for this are partly due to the configuration of engine management systems and also the general performance of devices fitted to vehicles to regulate emissions which degrade over time. Clearly, vehicle emissions are annually tested as part of the MOT but there is currently no test for NO_x.

The low emission vehicle parking levy system ideally should therefore be associated with on road performance rather than manufactured specifications. On this basis this study is recommending an approach which links all vehicles to an acceptable emissions factor database published by the NAEI. The problem is that emissions factors are generally based on a prescribed driving cycle which incorporates changes in speed. Emission factors such as COPERT 4 are then published for a given average speed as described in Section 4.1. In order to derive emissions it was assumed that all vehicles in the Merton parking scheme would be driven at some stage and that 25 km/h is the average speed in most cases. By combining the NO_x and CO₂ emission rates (g/km) at 25 km/h it is possible to derive total vehicle emissions.

3.3.1 Impact of Diesel Surcharge - and exemption for all electric vehicles

The principle of adopting a parking levy has been tested for the purposes of the study by considering the impact of a surcharge on diesel cars and zero charge for electric vehicles. This test does not take into consideration any changes which would occur, sensitivities around this are outlined in tests 1, 2 and 3. Table 4 shows there are 4,731 diesel cars and 132 diesel car derived vans under 3.5 tonnes with residential permits in Merton. The surcharge charge would only apply to these vehicles. There are 264 light goods vehicle vans (over 3.5 tonnes) that have residential parking permits. Under this test, electric vehicles would have zero charge.

3.3.2 Impact of Diesel Parking Levy on emissions

The following three sensitivity tests were considered to look at the change in annualised emissions compared to the base case fleet. For this part of the study vehicles holding an existing parking permit were divided into the following 5 bandings, based on emissions:

- Band 1 (Zero emission vehicles) Electric
- Band 2 (<10 g/km combined NO_x/CO₂)
- Band 3 (<90 g/km combined NO_x/CO₂)
- Band 4 (<170 g/km combined NO_x/CO₂)
- Band 5 (>170 g/km combined NO_x/CO₂)

The vehicle bandings were applied to the existing vehicle base case fleet.

Table 5: Division of current Merton residential permit vehicles into emission bandings.

Vehicle	Engine Size or Gross Vehicle Weight (GVW)	Low emissions			High emissions	
		Band 1	Band 2	Band 3	Band 4	Band 5
Petrol car	<1400 cc	0	1,316	2,449	55	26
Petrol car	1400-2000 cc	0	1,005	3,417	76	48
Petrol car	>2000 cc	0	0	940	127	69
Diesel car	<1400 cc	0	0	1	108	0
Diesel car	1400-2000 cc	0	0	168	2,811	0
Diesel car	>2000 cc	0	0	81	664	959
Petrol car derived van	1400-2000 cc	0	0	1	0	2
Diesel car derived van	<2000 cc	0	0	0	83	0
Petrol Van	<3.5t	0	4	9	0	9
Diesel van	<3.5t	0	0	0	0	264
Electric	Electric	5	0	0	0	0
Grand total						14,697*

Three tests have been applied to the base case to evaluate the impact on emissions of applying a parking levy to diesel vehicles.

- **Test 1.** All diesel cars are removed from the fleet
- **Test 2.** 10% of diesel cars in base year are switched to a minimum Euro 5 petrol variant. It is assumed that this effect is random. To do this, the first 10% vehicles in the database are modified which amounted to 474 vehicles.
- **Test 3.** 30% of diesel cars in base year are switched to a minimum Euro 5 petrol variant. It is assumed that this effect is random. The first 30% vehicles in the database are modified.

It was considered more appropriate to evaluate the impact of these options with respect to the change in annualised NO_x emissions from the base case rather than in terms of the impact on NO₂ concentrations at the roadside (which was originally proposed).

Base case

Annualised NO_x emissions were determined by each emission band for the base case. These results are given in Figure 9.

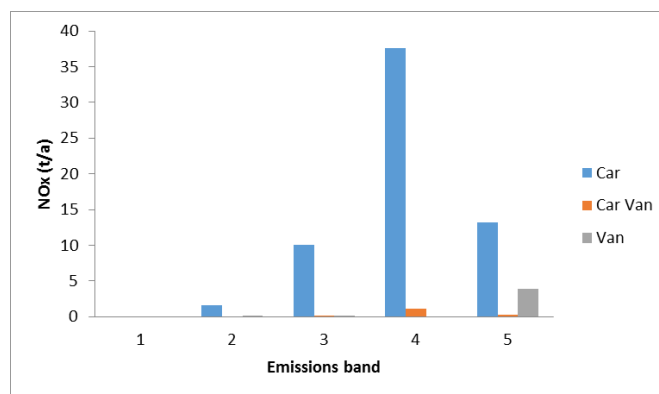


Figure 9 1: Base case annualised NO_x emissions from vehicles with parking permits by emission band (1=cleaner vehicles)

Test 1: Removal of diesel cars

Test 1 involves analysing the effect on emissions if all diesel cars were replaced by petrol variants. The results are shown for NO_x emissions in Figure 9. The reduction in NO_x emissions is quite dramatic, particularly in band 4. Overall, this would result in a reduction of annualised NO_x emissions by approximately 63%.

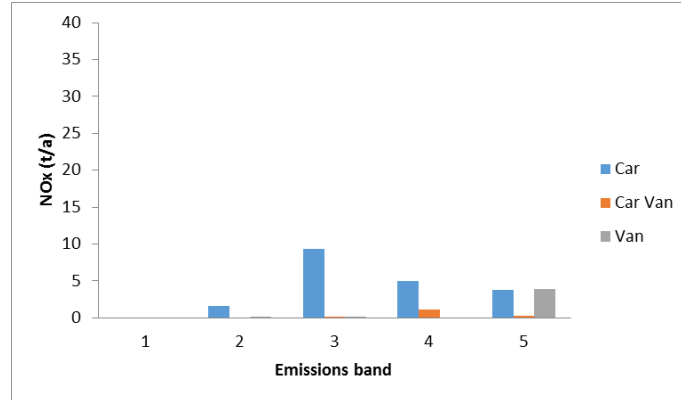


Figure 10: Test 1 - Annualised NO_x emissions with zero diesel cars in the parking permit fleet

Test 2 – 10% diesel cars switched to Euro 5 petrol equivalent

Test 2 analyses the effect on NO_x emissions if 10% of residential permit holders could be persuaded to switch their diesel car to a Euro 5 petrol equivalent. The impact on NO_x emissions are shown in Figure 11.

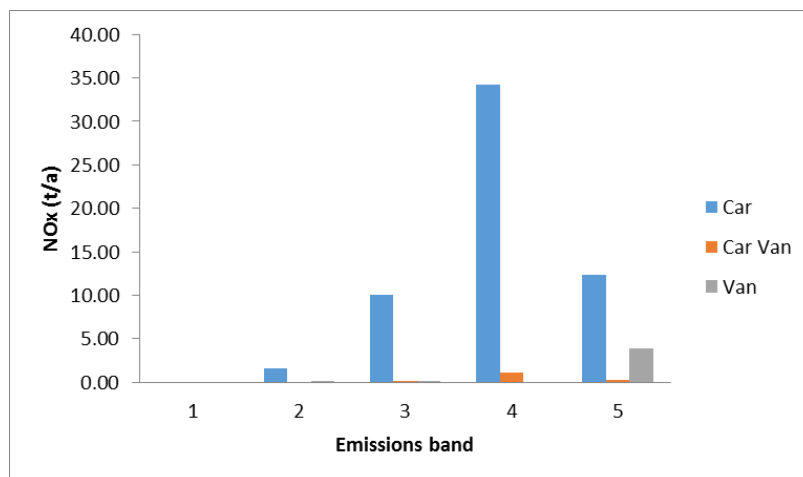


Figure 21: Test 2 - Annualised NO_x emissions with 10% diesel cars switching to petrol equivalent

Test 3 – 30% diesel cars switched to Euro 5 petrol equivalent

Test 3 is similar in principle to Test 2. This analyses the effect on NO_x emissions if 30% of residential permit holders could be persuaded to switch their diesel car to a Euro 5 petrol equivalent. The impact on NO_x emissions are shown in Figure 12.

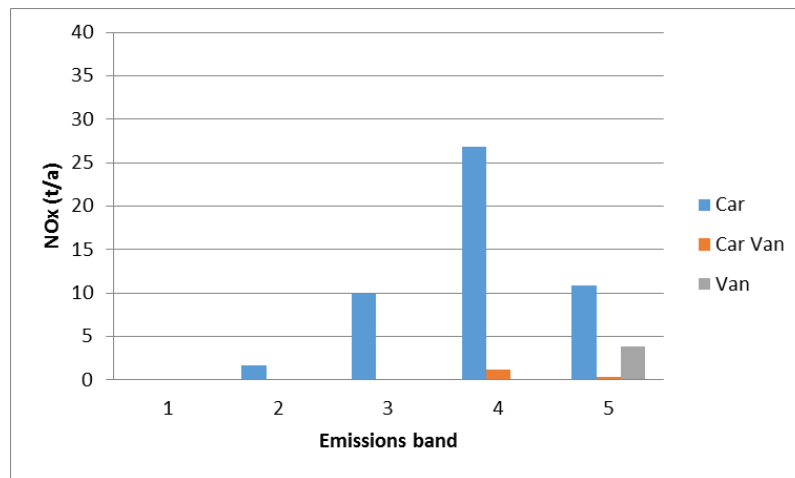


Figure 12: Test 3 - Annualised NO_x emissions with 30% diesel cars switching to Euro 5 petrol equivalent

Figure 11 shows that this test could reduce NO_x emissions from diesel vehicles in bands 4 and 5 as expected. The switch appears to have a negligible effect on bands 2 and 3 where the majority of petrol vehicles are due to the fact that the test assumes a shift to Euro 5 petrol. Overall the test estimates a 20% reduction in NO_x emissions.

3.3.3 Transition to Low/Zero Emission Vehicles

It is difficult to evaluate the impact of implementing a diesel parking levy on the uptake of zero/low emission vehicles. People that decide to purchase an electric vehicle are probably less influenced by preferential parking charges and more so by the way their vehicle is used on a daily basis and are likely to have an element of altruism in terms of their buying behaviour. There is also the need to consider the capacity of existing infrastructure, which may limit the opportunity for residents to adopt low emission vehicle technology in the short term.

Introducing a low emission parking permit scheme for residential parking provides an incentive to discourage the most polluting vehicles. This can be an effective means of promoting behaviour change but can also be accompanied by complementary measures and incentives to encourage residents to choose other sustainable transport options. These may include purchasing Ultra Low Emission vehicles (ULEV) and reducing car use by switching to other modes of transport.

The rate of adoption of ULEVs is determined by a number of factors but primarily comes down to cost and convenience for the motorist. Government subsidies for the purchase of ULEVs has increased uptake of electric vehicles across the UK with registrations rising from 500 per month at the start of 2014 to an average of around 2,400 per month during 2015. As a percentage of new car registrations, electric cars now represent just over 1% of the total new car market in the UK (Society of Motor Manufacturers and Traders 2016). However, it is acknowledged that the cost of purchasing a new vehicle is still prohibitively expensive for a large section of society.

In terms of convenience, the accessibility of charging facilities also has a bearing on the attractiveness of adopting ULEVs. TfL has produced a fact sheet detailing charging facilities by London Borough and there are currently 1,400 charging points across London. There is currently a

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lack of charging infrastructure in south London, for example Merton currently only has 6 public charging points, Richmond has 10, Sutton has 19 and Wandsworth has 24. This lack of local charging points could be seen as barrier to increasing the uptake of electric and hybrid vehicles in the short term and therefore improvements to the necessary infrastructure should be provided.

Other sustainable transport options have been promoted through the Merton AQAP including two public car clubs, the London Cycle Network, Walk-it scheme and development of green travel plans for businesses and schools. Merton is also committed to improving access to public transport and has used planning agreements to generate new car free developments as part of their overall plan to improve air quality.

The proposed low emissions parking levy, if adopted, would provide the Council with an opportunity to raise resident's awareness of the impact of emissions from their vehicles on local air quality and could provide an effective prompt to those considering changing their vehicle.

The scheme would benefit from additional public engagement prior to implementation to ensure that permit holders understand the justification for changes in the permit costs and are fully aware of the available opportunities for reducing emissions and minimising the personal impact of the levy.

3.4 Summary

This analysis was conducted to understand what effect the implementation of a resident's parking permit levy on diesel cars would have on reducing direct and indirect emissions. Emissions were calculated as a function of NO_x s over a limited number of vehicle types driven at a constant average speed and over a distance each year.

The idea behind this approach was to provide a parking levy system that reflects road emissions rather than the manufacturing specification.

To test the impact of implementing a diesel parking levy on revenue, a surcharge was applied to the existing residential parking permit fleet. Three further tests were undertaken to investigate the sensitivity on emissions for certain shifts in vehicle ownership due to the proposed parking levy.

The change in annual emissions was not estimated for the surcharge option as there is no real understanding as to people's preference to pay versus the preference to change vehicle types.

This could only realistically be achieved via public consultation to understand these preferences. For example, if the surcharge of £100 for diesel parking permits was found to be sufficient for everyone to switch to petrol variants (i.e. eliminating diesel cars and car vans), then an estimated reduction in annualised NO_x emissions of 60% (Test 3) would be possible.

4 BUSINESS EMISSION BASED PARKING LEVIES

4.1 Introduction

Business parking permits are only issued in Merton for vehicles that are essential for business and there is a limit of two permits per business. The business parking permits are issued for six months at a cost of £331 for all zones except for Wimbledon town centre where permits cost £376. There is a £25 administration fee for new permits, as for the residential permit system. The London Borough of Merton provided a list of the number plates and tariffs paid for all vehicles registered in the scheme, of which there were 324 unique vehicles. These number plates were sent to the DfT for analysis against the 2015 DVLA database whereby 311 vehicles were able to be matched and 13 unmatched. Nine of the 13 unmatched vehicles were registered in 2016 so vehicle details of these had to be determined manually the remaining four were discounted as having misread plate details. Of these matched vehicles, 90% of the vehicles were cars. A summary of the vehicle statistics are given in Table 6.

Table 6: Business parking permits – summary of vehicle types

Vehicle type	Number
Motorcycle	1
Car	288
Car derived van	14
Van	17
Heavy duty vehicle	0
Grand Total	320

The split of petrol and diesel vehicles was relatively even with 51% petrol and 49% diesels. This was in contrast to the residential permits where 64% of vehicles were petrol. This higher number of diesel vehicles for business use is likely to be due to company tax incentives and the higher mileage driven by businesses. The breakdown of these vehicles by Euro emission standard is shown for petrol and diesel vehicles in **Error! Reference source not found.3**. The analysis shows that petrol vehicles are dominated by cars of which there are mainly Euro 4 and Euro 5 vehicles. As for the residential permits, there are a higher number of newer diesel vehicles in the fleet with primarily Euro 5 vehicles but a lower number of the newest Euro 6 vehicles which may be reflecting a recent switch away from diesels.

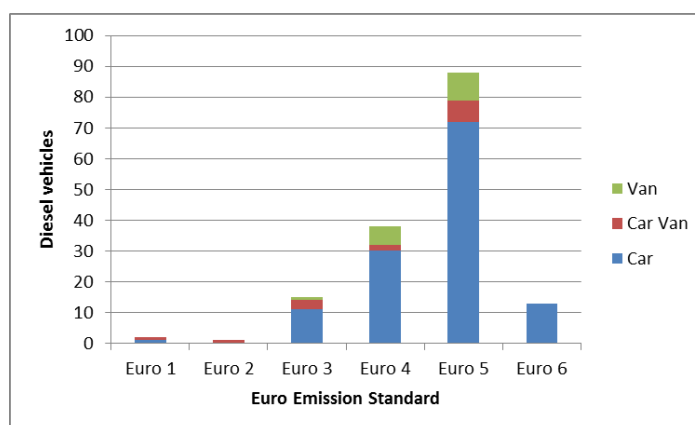


Figure 13: Business parking permits: Number of diesel vehicles by Euro Standard

*Excluding the motorbike from analysis

Impact –of surcharge for diesel cars and exemption for all electric vehicles

The impact of an annual surcharge on diesel cars was modelled. It is noted that car derived vans and LGVs are excluded because there currently no practical alternative variants for owners to procure. In the case of business permits, as these are paid every six months it is assumed that this surcharge equates to each six months. It is noted that at present there are no electric vehicles with business permits.

4.2 Impacts of options on emissions

In the same manner as for the residential parking permits, the following five sensitivity tests were considered to examine the change in annualised emissions compared to the base case fleet.

- **Test 1.** All diesel cars are removed from the fleet
- **Test 2.** 10% of diesel cars in base year are switched to a minimum Euro 5 petrol variant. It is assumed that this effect is random. To do this, the first 10% vehicles in the database are modified which amounted to 474 vehicles.
- **Test 3.** 30% of diesel cars in base year are switched to a minimum Euro 5 petrol variant. It is assumed that this effect is random. The first 30% vehicles in the database are modified.

To determine annualised emissions it was assumed that each vehicle travelled an average distance each year of (~32,000 kilometres) for business usage at an average speed (25 km/h) to be able to compare the impacts of each option.

Base case

Annualised NO_x emissions were determined by each emission band for the base case. These results are given in Figure 14.

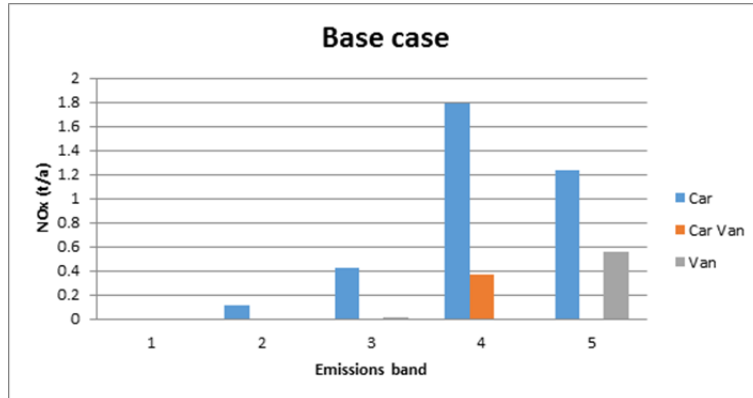


Figure 14: Base case annualised NO_x emissions from vehicles with parking permits by emission band (1=cleaner vehicles)

Test 1: Removal of diesel cars

Test 1 involves analysing the effect on emissions if all diesel cars were converted to petrol variants. The results are shown for NO_x Figure 15. Overall, this policy would result in a reduction of annualised NO_x emissions by approximately 63%.

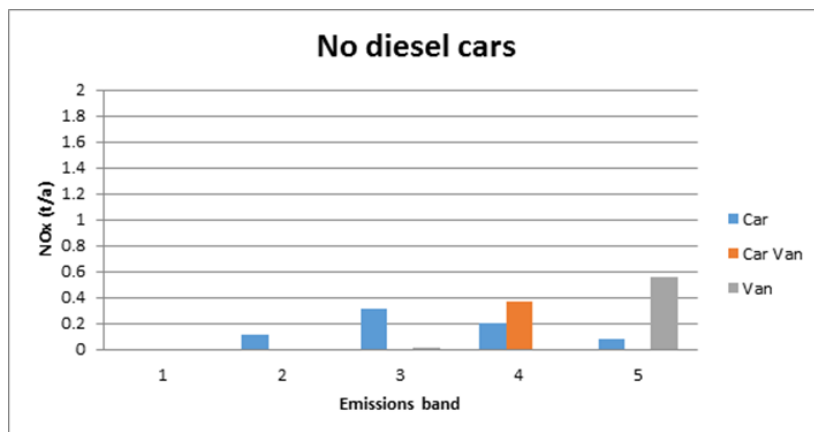


Figure 15: Test 1 - Annualised NO_x emissions with zero diesel cars in the parking permit fleet

Test 2 – 10% diesel cars switched to Euro 5 petrol equivalent

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Test 2 analyses the effect on NO_x if 10% of business permit holders could be persuaded to switch their diesel car to a Euro 5 petrol equivalent. The impact on NO_x emissions are shown in Figure 16.

The change in the profile of emissions from the base case is not immediately obvious from the figures compared to the baseline. However, there would be an overall reduction in NO_x emissions by 6% compared to the base case.

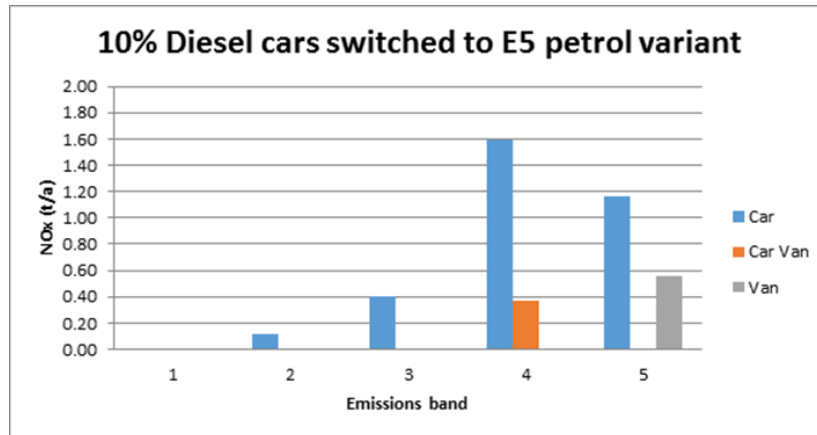


Figure 16: Test 2 - Annualised NO_x emissions with 10% diesel cars switching to petrol equivalent

Test 3 – 30% diesel cars switched to Euro 5 petrol equivalent

Test 3 is similar in principle to Test 2. This analyses the effect on NO_x emissions if 30% of business permit holders could be persuaded to switch their diesel car to a Euro 5 petrol equivalent. The impact on NO_x emissions are shown in Figure 17.

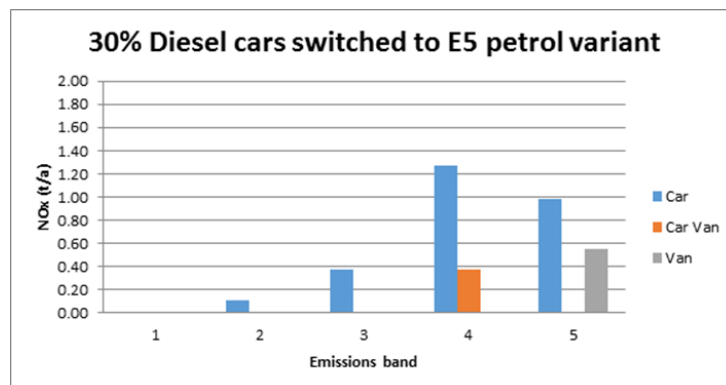


Figure 173: Test 3 - Annualised NO_x emissions with 30% diesel cars switching to Euro 5 petrol equivalent

This shows that this test could reduce NO_x emissions from diesel vehicles in bands 4 and 5 as expected. The switch appears to have a negligible effect on bands 2 and 3 compared to Test 4 where the majority of petrol vehicles are due to the fact that the test assumes a shift to Euro 5 petrol. Overall the test estimates that there would be an 18% reduction in NO_x emissions compared to the base.

5 CONCLUSION - MAXIMISING OPPORTUNITIES AND RECOMMENDATIONS

The whole of the London Borough of Merton is declared an Air Quality Management Area for nitrogen dioxide (NO₂) and PM₁₀ which demonstrates that local air quality is therefore a key public health issue. The local authority has an Air Quality Action Plan that sets out a number of measures to reduce emissions and pollutant concentrations in the borough and to work with the local community and neighbouring or wider authorities to achieve this.

This study has demonstrated an approach for a low emission based residential and business parking permit system in Merton that considers on-road emissions rather than the manufacturing specification. Recent evidence has shown that although modern diesel vehicles (primarily cars) have very low fuel consumption and hence low CO₂ emissions they produce high emissions of local air quality pollutants such as NO_x. The approach taken in this study therefore takes into account the impacts of these pollutants and is considered to be more thorough and rational to many of the low emission parking schemes which are being used by local authorities as these are primarily based on CO₂ emissions or fuel consumption.

The study has considered the impact of implementing a surcharge on all diesel vehicles in the residential and business parking permit fleet. This together with a zero fee for all plug-in electric or hybrid vehicles is designed to encourage local residents to make a transition from diesel to zero/low emission vehicles. A surcharge is not proposed in the early stages of the scheme for petrol vehicles as it is acknowledged that a mass transition to electric/hybrid vehicles is unlikely to be achieved in the short term and petrol provides a viable alternative to diesel given generally lower emissions of air quality pollutants such as NO_x and particulates.

The approach adopted for calculating the impact of applying the diesel surcharge is based on dividing the fleet into 5 emission bands based on a combined emission rates for local air quality pollutants and carbon dioxide. The proposed surcharge scheme means that Merton can continue to charge differing amounts for second and third cars and different amounts for resident and business permits if they wish. It is also clear that the approach also needs to provide a fair system that benefits the environment but that isn't too detrimental to vehicle users. Although there may be an increase in revenue in the first year of a surcharge being applied, it is anticipated that over time this revenue will decline as the diesel fleet decreases, but this has not been tested.

The study has provided a number of recommendations which are summarised below.

1. Further analysis to consider the impact on revenue over a five year period as the fleet improves over time.
2. Consider impact of introducing different parking levies for petrol vehicles based on emission banding to encourage transition of higher emission petrol vehicles to zero/low emission alternatives in the medium to long term.
3. Consider the impact of different surcharge rates on revenue to take into account increased administrative burden to introduce this system and to provide additional investment in infrastructure to meet the needs of residents adopting zero/low emission vehicle technologies.
4. Consider preference surveys or behavioural analysis of residents and businesses to understand the preference of owners to either pay a higher permit charge versus the preference to change their vehicle to pay a lower charge. This could help identify what percentage change to charges may be needed to result in the desired change and improvement in emissions.

GLOSSARY

AQAP	Air Quality Action Plan
AQMA	Air Quality Management Area
CAZ	Clean Air Zone
CO ₂	Carbon dioxide
COPERT	Computer Programme to Calculate Emissions from Road Transport
Defra	Department of Environment, Food and Rural Affairs
DfT	Department for Transport
DVLA	Driver Vehicle Licensing Agency
EU	European Union
GLA	Greater London Authority
GVW	Gross Vehicle Weight
HGV	Heavy Goods Vehicle
LAEI	London Atmospheric Emissions Inventory
LAQM	Local Air Quality Management
LEZ	Low Emission Zone
LGV	Light Goods Vehicle
LIP	Local Implementation Plan
NAEI	National Atmospheric Emissions Inventory
NHS	National Health Service
NO ₂	Nitrogen Dioxide
NO _x	Nitrogen Oxides
PM ₁₀	Fine particles with a diameter of less than 10 µm
PM _{2.5}	Fine particles with a diameter of less than 2.5 µm
TfL	Transport for London
ULEV	Ultra Low Emission Vehicle
ULEZ	Ultra Low Emission Zone

APPENDIX A - AIR QUALITY OVERVIEW

National Air Pollution and Public Health Evidence

Air pollution is increasingly recognised as a major cause of ill health and premature death. The most recent report by The Royal College of Physicians 'Every breath we take: the lifelong impact of air pollution' (February 2016)¹¹ says that:

- Each year in the UK, around 40,000 deaths are attributable to exposure to outdoor air pollution, with more linked to exposure to indoor pollutants
- Air pollution plays a role in many of the major health challenges of our day, and has been linked to cancer, asthma, stroke and heart disease, diabetes, obesity, and changes linked to dementia.
- Neither the concentration limits set by government, nor the World Health Organisation's air quality guidelines, define levels of exposure that are entirely safe for the whole population.

Ongoing research provides evidence that the impact of poor air quality on an individual's health can start in the womb and continue through childhood affecting the development of the lungs and other major organs. These effects can have a lasting effect into adulthood, compromising a person's health further as the individual ages and becomes increasingly vulnerable to the effects of air pollution.

The financial cost of air pollution to the United Kingdom has been valued at more than £20 billion per year. This cost is related to the annual mortality burden in the UK from exposure to outdoor air pollution (equivalent to around 40,000 deaths per year) together with the additional impacts of exposure to indoor air pollution such as radon and passive smoking. Poor health caused by air pollution has wide impacts on society, business, and the health service and on individuals who suffer from illness and premature death.

There is no doubt that air pollution has improved significantly in the UK since the smogs of the 1940s & 50s, mainly as a result of the Clean Air Act 1956. However, whilst there has been a reduction in smoke and sulphur dioxide emissions in line with the decrease in coal burning, the change in our lifestyles and the increase in road transport means that many people are now more exposed to NO₂ and particulate matter arising primarily from the transport sector.

In 2012, road traffic in the UK was ten times higher than in 1949 and the total average distance walked each year decreased by 30% between 1995 and 2013. (RCP 2016)⁴

Previous fuel regulations have been effective in reducing sulphur and lead in diesel and petrol but NO₂ and particulates from diesel engines have been poorly controlled and these remain a problem. In the UK today nearly all buses, vans, lorries and approximately 50% of passenger cars run on diesel.

The Environment Act 1995 and associated regulations established the LAQM system, under which all local authorities in England, Wales and Scotland are required to regularly review and assess air quality in their areas against objectives for several pollutants of particular concern for human health.

Where a local authority has identified areas with pollution concentrations in excess of the objectives it is required to designate an AQMA and produce an Air Quality Action Plan (AQAP) detailing the remedial measures to be adopted to tackle the problem within the AQMA. Currently there are more than **700 AQMAs** in UK mostly related to exceedances of NO₂ as illustrated in **Error! Reference source not found.**

In addition to the LAQM process, the European Union, through the 2008 [ambient Air Quality Directive](#), sets legally binding limits for concentrations in outdoor air of major air pollutants that impact public health such as particulate matter (PM₁₀ and PM_{2.5}) and NO₂. The EU Air Quality Directive divides the UK into 43 zones and agglomerations with the UK failing to meet the annual mean limit

¹¹ Royal College of Physicians – Working Party Report (February 2016) <https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution>

London Borough of Merton: Air Quality & Parking Project

value for NO₂ in 38 of the 43 zones. In addition some parts of London also breached the European hourly NO₂ limit with the maximum limit for more than 18 hours per year being breached within the first few weeks of 2016.

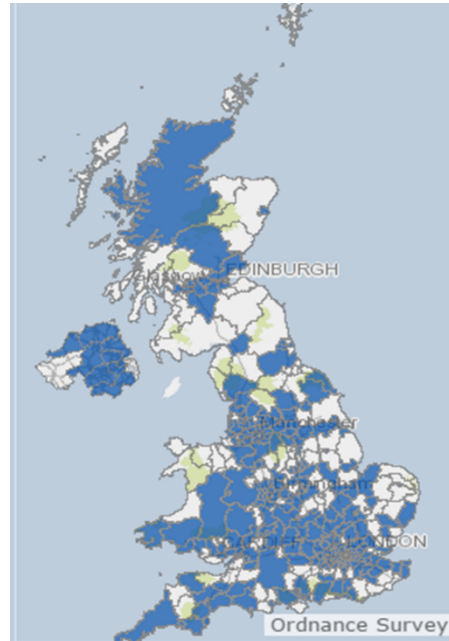


Figure 4: Map of UK Local Authorities with AQMAs (Source: Defra)

As a consequence of the failure to comply with the limit values the UK is currently subject to EU infringement proceedings which may result in the imposition of substantial fines. The UK government have indicated that any fines imposed by the EU may be passed down to local authorities through the discretionary powers under Part 2 of the Localism Act.

In April 2015, the UK Supreme Court ordered the Government to redraft the national action plan to ensure compliance with legal NO₂ limits as soon as possible. Defra's Air Quality Plan aims to try and achieve compliance with the limit values in the shortest time possible. The plan includes the introduction of a national framework for the introduction of Clean Air Zones (CAZs), together with a range of other measures to deliver effective vehicle emission standards and to accelerate the uptake of ultra-low emission vehicles.

APPENDIX B – LONDON AIR QUALITY

Research by King's College London has estimated that air pollution was responsible for up to 141,000 life years lost or the equivalent of up to 9,400 deaths in London in 2010, as well as over 3,400 hospital admissions. The total economic cost associated with this was estimated at £3.7 billion¹² In addition, analysis by Policy Exchange¹³ has established that 328,000 children attend schools in London where annual mean NO₂ concentrations exceed the health based objective. This number represents nearly 25% of all pupils in London.

Much has already been done across London to address the air quality problem both at a strategic level and within local boroughs but the magnitude of the problem means that significant improvements still need to be made. The Mayor's first Air Quality Strategy in 2001 instigated the London Congestion Charge Zone, provided investment in public transport and introduced measures to reduce emissions from buses, taxis and HGVs. It also paved the way for introduction of the Low Emission Zone (LEZ) in 2008.

The Mayor's Air Quality Strategy was updated in 2010 introducing additional measures including imposing an age limit for black cabs and private hire vehicles; investment in cleaner hybrid and hydrogen buses; retrofitting/replacing older buses, and investment in public transport. The Mayor's Clean Air Fund also provided £5m to promote innovative pollution reduction measures, such as dust suppressants, green walls and other green infrastructure, and a no engine idling campaign across Central London.

In 2013 the Mayor further extended the Strategy to introduce the London Ultra Low Emission Zone (ULEZ). The ULEZ comes into force in 2020 and will increase restrictions on vehicles travelling in the congestion charge zone. The ULEZ charge will be dependent on vehicle emission standards with only diesel vehicles meeting Euro 6 standards, and petrol vehicles meeting Euro 4 standard being exempt from the additional charge.

In July 2016 the new Mayor of London started consultation on a number of air quality initiatives including the potential extension of and earlier start to the implementation of the ULEZ.

¹²¹² 3.8 million people work in parts of London which are above legal limits for NO₂ pollution, representing 44% of London's workday population (policy exchange)⁶

¹³ Policy Exchange – Capital City Foundation 'UP IN THE AIR: How to Solve London's Air Quality Crisis: Part 1' Richard Howard (2015) <http://www.policyexchange.org.uk/publications/category/item/up-in-the-air-how-to-solve-london-s-air-quality-crisis-part-1>

APPENDIX C – MERTON AIR QUALITY

The London Borough of Merton is a south London borough covering an area of 15 square miles and a population of 203 200 (Office of National Statistics 2014). It is a predominantly residential area with the main commercial areas centred in Mitcham, Morden and Wimbledon. Merton declared a borough-wide AQMA in 2003, based on exceedance of the annual mean objectives for both NO₂ and PM₁₀. The Detailed Assessment report¹⁴ produced by Merton identified the main source of pollution as being from road traffic particularly on busy and congested routes within the borough together with elevated background levels generated from the wider surrounding urban areas. The pollution contour map reproduced in **Error! Reference source not found.**1 provides the predicted annual mean NO₂ concentrations for 2015 from this report and clearly identifies elevated concentrations on the principal roads through the Borough including the A3 trunk road, the A24, the A217, A236, A237 and A296.

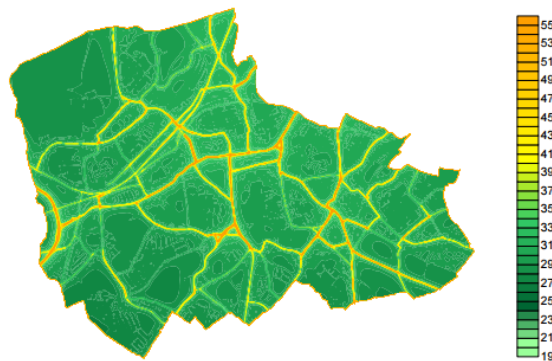


Figure 1: Modelled annual mean NO₂ concentrations (µg/m³) in Merton, 2015

Figure 2 shows that the number of days exceeding the daily mean PM₁₀ objective (of no more than 35 days) is only likely to be exceeded on a small section of the London Road (A236) on the south east boundary of the borough.

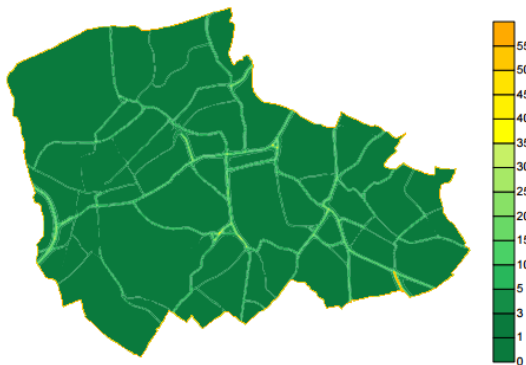


Figure 2: Modelled daily mean PM₁₀ (number of days exceeding 50 µg/m³) in Merton, 2015.

Merton produced their AQAP in 2003 setting out measures to improve air quality across the borough and ultimately to achieve compliance with the UK air quality objectives. Sixteen of the 32 original action plan measures have been completed, are ongoing as statutory functions undertaken by the Council, or have become redundant due to changes implemented by others. Completed actions include improving the Council's vehicle fleet; establishing two public car clubs; the introduction of a number of 20mph 'Home zones'; the adoption of supplementary planning guidance on air quality and the use of Section 106 planning agreements to bring forward 6 car free developments. Other

¹⁴ London Borough of Merton Air Quality Detailed Assessment, 2003

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measures have promoted active travel campaigns and supported the development of sustainable school and business travel plans.

Ongoing and current action plan measures include the introduction of controlled parking zones; improving access to sustainable travel modes and development of Freight Quality Partnerships through work with the local business community. Merton have tracked the progress of individual action plan measures since inception and continue to monitor air pollution across the borough through the monitoring network based on two long term automatic stations and a series of diffusion tube sites.

The latest available monitoring data is available from the 2015 Updating and Screening Assessment, which indicates that the annual mean NO₂ objective was exceeded at six monitoring sites during 2014, these were all roadside sites at various locations across the borough including Morden, Wimbledon, Merton High Street, Colliers Wood and Raynes Park. There were no measured exceedances of either the short or long term PM₁₀ objectives in 2014.¹⁵

¹⁵ London Borough of Merton Air Quality Updating and Screening Assessment in fulfilment of Part IV of the Environment Act 1995 LAQM (June 2015).

APPENDIX D – LOCAL POLICY DRIVERS

In addition to the AQAP there are additional local policy drivers linking transport and health. This includes the Merton Annual Public Health Report 2015 entitled, '*The Time for Prevention is Now - Keeping People Healthy Reduces Health Inequalities*'¹⁶. This is the second annual public health report for Merton which makes the case for prevention and recognises the work of the Public Health team and its partners since the transition of public health from the NHS to local government.

Within the report, Theme 5: 'A good natural and built environment' encourages the transition to more sustainable transport initiatives within the borough by, 'Promoting and enabling sustainable 'active' travel modes such as walking, cycling and using public transport, enables people to integrate increased physical activity levels into their everyday lives'.

By coordinating efforts to increase active travel and reduce dependence on car travel there are clear benefits to health, both in terms of increasing physical activity but also in reducing harmful emissions to air.

¹⁶ Merton Annual Public Health Report 2015 entitled, '*The Time for Prevention is Now - Keeping People Healthy Reduces Health Inequalities*'. <http://www.merton.gov.uk/annualpublichealthreport2015-web.pdf>

APPENDIX E - LEGAL FRAMEWORK FOR EMISSIONS BASED PARKING LEVIES

The key legal framework for allowing for parking operation and enforcement duties comes under the Road Traffic Regulation Act 1984 and Road Traffic Act 1991. Designation of parking is achieved through traffic regulation orders.

The Road Traffic Act 1991 provides local authorities with the power to enforce parking activities themselves rather than the police (i.e. decriminalising parking enforcement). Under these powers, local authorities can issue fines or parking tickets. Under Sections 45 and 46 of the Road Traffic Regulation Act 1984, Councils can designate parking places on the highway, to charge for parking in these places and to make a charge for parking permits for their use. Local authorities can also introduce differential permit charges between vehicles of different classes based on factors including their level and type of emissions. Exemptions to these charges may be granted, for example for disabled drivers, carers, tradespeople including taxis.

Under this act, the function of setting charges for permits and vouchers must, be exercised to "secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking on and off the highway..." so far as practicable having regard to:

- a) the desirability of securing and maintaining reasonable access to premises;
- b) The effect on the amenities of any locality affected and the strategy prepared under section 80 of the Environment Act 1995 (national air quality strategy);
- c) the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles; and
- d) any other matters appearing to the local authority to be relevant (section 122 of the 1984 Act)

In London, local authorities must also have regard to the Mayor of London's Transport Strategy (sections 142 and 144(1)(a) Greater London Authority Act 1999) which emphasises the importance of reducing emissions and improving air quality.

Other relevant guidance for consideration include the Secretary of State's non statutory Operational Guidance on Parking that recommends that authorities set charges which are consistent with the aims of their transport strategy including road safety and traffic management strategies. For example, Merton's Sustainable Transport Strategy and Local Implementation Plan (LIP) for 2011-2026 states that they will review, introduce or enhance existing parking controls subject to consultation. The LIP also has an important role in supporting Merton's Air Quality Action Plan in working to reduce emissions associated with transport¹⁷.

It is unlawful for a Council to set or increase charges for parking permits for the purpose of generating additional income to fund its traffic management functions. In the event that the impact of the proposed new charges generates a surplus over and above the cost of the on street parking scheme and its administration and enforcement, the Road Traffic Regulation Act 1984 requires that surpluses are used for specific transport purposes as listed in section 55(4) of this act and amended by more recent regulations including the Greater London Authority Act 1999, the London Local Authorities and TfL Act 2003 and the Traffic Management Act 2004. These schemes include:

- Provision and maintenance of off-street parking facilities
- Provision and operation of (or facilities for) public transport services
- Highway improvements
- Other schemes that facilitate the implementation of the Mayor's Transport Strategy
- Roads maintenance
- Environmental improvements

Any shortfall or deficit as a result of the emission based parking scheme is required to be made good from the general rate fund (i.e. the Council tax).

¹⁷ <http://www.merton.gov.uk/merton-lip2-only-web.pdf>

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There is already precedent set for introducing emissions based parking permits or providing discounts for low emission vehicles under provisions given in the Road Traffic Regulation Act 1984. Currently at least ten London Boroughs have successfully introduced or are considering such schemes as part of measures to reduce road vehicle related emissions set out in their Air Quality Action Plans and LIPs.

Appendix 2

Listed below in table 1 are a range of surcharges for consideration

Permit Type	Number of permits currently issued	Number of Diesel vehicles	Current first permit charges PA	Phased Introduction at £100			Phased Introduction at £90		
				Surcharge 2017/18 £100	Surcharge 2018/19 £125	Surcharge 2019/20 £150	Surcharge 2017/18 £90	Surcharge 2018/19 £115	Surcharge 2019/20 £150
Resident Parking Permit	16,136	5,486	£65	£548,600	£685,750	£822,900	£493,740	£630,890	£822,900
Business Parking Permit	523	182	£752 inner zones £662 outer zones	£18,200	£22,750	£27,300	£16,380	£20,930	£27,300
Trades Permit	211	73	£900 (Full Year) £600 (6mnths) £375 (3mnths) £150 (1mnth) £50 (1 wk)	£7,300	£9,125	£10,950	£6,570	£8,395	£10,950
Total	16,870	5,741		£574,100	£717,625	£861,150	£516,690	£660,215	£861,150

Permit charges for 1st residents and 1st Business permits for all London Boroughs

	Residents	Business	
Havering	£25	£200	
Enfield	£40	£660	Emissions based
Redbridge	£45	£265	
Hounslow	£80	£753.75	
Barking & Dagenham	£36	£261	Emissions based band D (1601 - 1800 CC)
Barnet	£40	£525	Emissions based
Bexley	£100	£150	
Barnet	£111	£366	Emissions based band 4 (1551 - 1800 CC)
Bromley	£80	£100	
Camden	£124.27	£328.45	Emissions based band 2 (1300 - 1849 CC)
Croydon	£80	£382	
Ealing	£98	£800	
Greenwich	£57	£216	
Hackney	£112	£540	Emissions based (1200 - 2000 CC)
Hammersmith & Fulham	£119	£791	
Haringey	£114.20	£309	Emissions based (1550 - 3000 CC)
Harrow	£70		NO info online RE business permits
Hillingdon	£0	£480	
Islington	£144	£1,150	Emissions based (1501 - 1650

			CC)
Kensington & Chelsea	£135	not offered	Emissions based (151-165g/km)
Kingston upon Thames	£90	£340	
Lambeth	£175.50	£600	Emissions based (1550 - 3000 CC)
Lewisham	£120	£500	
Merton	£65	£662	
Newham	£0	£600	
Richmond	£99	£554	
Southwark	£125	£577.50	
Sutton	£51	not offered	
Tower Hamlets	£103	£726	Emissions Based (1601 - 1800 CC)
Waltham Forest	£35	£405	Emissions Based (up to 1549 CC)
Wandsworth	£160	£895	
Westminster	£141	not offered	

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Merton Council - call-in request form

1. Decision to be called in: (required)

Emissions Levy – The introduction of a diesel surcharge for all types of resident and business parking permits

2. Which of the principles of decision making in Article 13 of the constitution has not been applied? (required)

Required by part 4E Section 16(c)(a)(ii) of the constitution - tick all that apply:

(a) proportionality (i.e. the action must be proportionate to the desired outcome);	X
(b) due consultation and the taking of professional advice from officers;	X
(c) respect for human rights and equalities;	X
(d) a presumption in favour of openness;	X
(e) clarity of aims and desired outcomes;	X
(f) consideration and evaluation of alternatives;	X
(g) irrelevant matters must be ignored.	

3. Desired outcome

Part 4E Section 16(f) of the constitution- select one:

(a) The Panel/Commission to refer the decision back to the decision making person or body for reconsideration, setting out in writing the nature of its concerns.	X
(b) To refer the matter to full Council where the Commission/Panel determines that the decision is contrary to the Policy and/or Budget Framework	
(c) The Panel/Commission to decide not to refer the matter back to the decision making person or body *	
* If you select (c) please explain the purpose of calling in the decision.	



4. Evidence which demonstrates the alleged breach(es) indicated in 2 above (required)

Required by part 4E Section 16(c)(a)(ii) of the constitution:

We – the signatories – are in favour of the principle that the polluter should pay. We fully recognise the seriousness of the air pollution problem in Merton and would wish to see this urgently addressed. We also recognise that diesel vehicles are now widely accepted as being the most polluting vehicles. We agree that the council should therefore encourage a transition away from diesel/petrol towards electric cars. However, we are concerned about the implementation and effectiveness of the specifics of this proposed policy and would question the motivation of the decision making process on the following grounds:

(a) proportionality (i.e. the action must be proportionate to the desired outcome);

The decision to proceed with the emissions levy is disproportionate to the desired outcome. The claimed outcome is a reduction in diesel pollution in the borough and the council claims this could be done by targeting diesel car owners who live in Controlled Parking Zones (CPZs) and have purchased a permit. Nowhere in the reports to Cabinet or the Sustainable Communities scrutiny panel does it state categorically that specifically reducing the number of Merton residents living in a CPZ and purchasing a permit for their diesel vehicle would cause a drop in air pollution. The air pollution maps presented to the scrutiny panel and Cabinet clearly show that the residential areas where most of these CPZ and diesel owners live continue to have low pollution levels.

The decision does not establish the principal sources of the air pollution in Merton. It is not clear what proportion of air pollution is coming from the vehicles affected and what proportion is emanating from either diesel vehicles in other parts of the borough without a CPZ or from vehicles simply travelling through the borough but whose owners live elsewhere.

This policy as proposed is a blunt instrument which doesn't appear necessarily to target the behaviour which is causing the borough's air pollution problems. The levy simply penalises residents with a diesel car who live in a CPZ regardless of how much they actually drive their vehicle. It also unfairly penalises those who have no off road parking at their property since they will have to buy a permit. If two residents have diesel

cars, but one needs to buy a permit and the other doesn't, this says nothing about how much each of them drives around and how polluting each of them is.

Nor does it say anything about how many non- Merton residents with diesel cars drive through Merton. Merton is often described as a commuter borough in that people are often travelling through or starting journeys here. Many of the hotspots are on the major roads (often managed by Transport for London) or those residential streets which people use as shortcuts. The people using these roads are contributing towards air pollution in the borough and yet this policy imposes no penalty on them for this.

As was raised in pre-decision scrutiny, there is no mechanism proposed to charge on through users, including heavy goods vehicles etc., nor even to charge all diesel vehicle owners in Merton. The risk is that this levy will have no significant impact on air pollution on the key road networks in the borough where air pollution is worst and therefore is a disproportionate measure to impose on a minority of residents.

(b) due consultation and the taking of professional advice from officers;

It has not been demonstrated by the Cabinet that there has been any consultation on this. It was slipped in as a potential idea in the MTFIS in 2015/16 with no details provided and the majority of Members most likely did not know about it.

More worryingly, the public has no idea this will hit them from April 2017. This is deeply unreasonable and not fair to residents.

At pre-decision scrutiny, Members agreed that officers needed to give further consideration to how the diesel levy is going to be communicated as there was concern about residents not being given sufficient notice of at least a year to allow them to change their behaviour before the surcharge is imposed (see 4.3). There is no evidence in the report to Cabinet that this work has been done and, if it has, that Cabinet considered it in reaching a decision.

Moreover, it appears that the Cabinet has not taken the professional advice of the authors of the TTR study appended to the Cabinet report. This clearly recommended consultation on any proposals to raise awareness among residents and yet no such consultation has taken place prior to a decision being reached.

(c) respect for human rights and equalities;

There has been no impact assessment and review of how only certain areas of people will be disproportionately affected. What assessment has

been made on the elderly or disabled who may need their cars for example?

At 8.1 the report states there are no human rights, equalities and community cohesion implications and yet this policy clearly targets residents in the west of the borough more than those in the east since it is clearly acknowledged that the majority of the CPZs are located in the west of Merton. Again this demonstrates a lack of fairness.

This decision also risks having a disproportionate impact on those residents on low incomes since they may have an older and more polluting vehicle and yet cannot easily or quickly afford to upgrade their vehicle to one which would not be subject to this proposed surcharge.

(d) a presumption in favour of openness;

This decision has not been open, the details are vague and the relevant consultation and engagement with residents that is recommended in the TTR study to determine what would be most effective in altering the behaviour of diesel vehicle drivers in the borough has not occurred. The risk is that the perception of residents is that this decision has been taken predominantly in order to generate revenue for the council and to deliver on the savings proposal included in the MTFS.

(e) clarity of aims and desired outcomes

The Cabinet Member says this is about reducing air pollution, but the report itself details where in the borough the air pollution is worst, and there is no detail on specific clean air measures the council will spend the money on. It all just appears to go in the general funds of the E&R department to spend on whatever transport or environmental items it determines. The report should have set down precisely what anti-pollution measures would be implemented with this additional revenue, i.e. new tree planting, cycle and walking infrastructure improvements, pollution abatement outside key school sites etc.

It appears from the report that the key aim and outcome is to fill a budget gap. The predicted revenue projected in the 2015/16 budget round indicated £250,000, but this new plan will raise £516,000 alone in its first year, rising towards £900,000 in 2019/20. This is a gross change of outcome that no one knew about beforehand. It also differs hugely to what was said at the Sustainable Communities panel meeting in September 2016. Price points of around £50 were spoken of then, and £0 for electric vehicles.

The TTR study makes clear that the authors cannot say what the optimum level of the surcharge would be to influence behaviour change without further behavioural analysis and consultation which has not been undertaken. Yet the report shows that the level of levy determined by the Cabinet is higher than other boroughs in London with similar schemes despite the TTR study clearly saying that it should be in line with other

boroughs.

This again casts doubt on the aims of the Cabinet decision, which looks more like it will penalise people unfairly without offering the correct incentives to change residents' behaviour and reduce air pollution.

Also, the TTR proposals are all predicated on no charge for zero and low emissions vehicles yet the Cabinet has rejected making permits for electric vehicles free which undermines the stated aim and outcome of the whole scheme.

(f) consideration and evaluation of alternatives;

No significant thought or effort seems to have been given to alternatives. There are other areas the council could focus on to bring down high levels of air pollution, instead of targeting residents who are unlikely to be able to avoid this additional charge by the council – at least not initially – without a considerable capital outlay themselves.

2.6 refers to other direct controls that councils can use to influence change in vehicle choice but it isn't made clear what these are.

There is no reason given for imposing a blanket surcharge on all diesel vehicle owners living in a CPZ when it is clearly acknowledged that brand new diesel vehicles are considerably cleaner than older ones. Why has a more targeted approach not been adopted?

At 3.1, only two alternative options are listed and yet there are other possibilities such as introducing a zero emissions zone or imposing the surcharge on ownership of diesel vehicles across the borough rather than only on parking permits. None of these appear to have been explored in the report of recommendations to Cabinet.

It is also not clear why the Cabinet has not given serious consideration to the adoption of a more thorough and complete emissions system taking into account petrol vehicles too (as has happened in a number of other London boroughs). If the prime aim of this decision were to tackle air pollution across the borough, surely this would have been a more holistic approach. Yet no reasons are given as to why the Cabinet has delayed that for 2 years. This delay causes a lack of clarity for vehicle owners in CPZs as it makes it difficult for them to plan their next vehicle purchase given that the comprehensive emissions system is still at least two years away. Understandably they would not wish to purchase a vehicle that in 2 years' time is again caught by additional charges and so they may conclude that it is better simply to retain their existing, polluting vehicle until such a system has been introduced.

Similarly, there is no clear rationale set out for why the Cabinet has rejected the idea of free permits for electric vehicles. This again suggests the policy is a revenue raising measure as much as a serious attempt to tackle air pollution

We believe the council should fully investigate other options that are less of a blunt tool and will have a greater impact on the air pollution issues facing the borough before confirming this decision hence the reason for the call in.

5. Documents requested

All papers provided to the Director of Environment and Regeneration/Director of Corporate Services and relevant Cabinet Members prior to, during and subsequent to the decision making process on the emissions levy and the refusal to make parking permits for electric vehicles free.

All emails, reports and associated documentation relating to the decision on the emissions levy and the refusal to make parking permits for electric vehicles free provided to the relevant Cabinet Members, Leader of the Council, Chief Executive, Director of Environment and Regeneration, Director of Corporate Services and other council officers.

Meeting notes of all meetings between officers / Cabinet Members and any third parties on the emissions levy and the refusal to make parking permits for electric vehicles free.

Any correspondence between the council and organisations lobbying on the emissions levy and the refusal to make parking permits for electric vehicles free.

The Equality Impact Assessment (or any other equalities analysis carried out) in relation to the emissions levy and the refusal to make parking permits for electric vehicles free.

The risk analysis conducted in relation to the emissions levy and the refusal to make parking permits for electric vehicles free.

Detailed financial analysis of the emissions levy, and in particular the impact on council revenue over the medium term.

Detailed financial analysis of the refusal to make parking permits for

electric vehicles free, including how much money is currently generated by electric vehicles' parking permits and how much this would be if the permits were a) free and b) £25.

Analysis undertaken of a) the age and b) the emissions level of the vehicles impacted by the proposed emissions levy in CPZs compared to the age and the emissions level of all vehicles recorded on Merton's roads in general (including red routes and outside of CPZs).

All analysis undertaken to address the 4 recommendations outlined at the conclusion of the TTR study (shown on page 27 of the Cabinet report).

A breakdown of:

- All other direct controls that councils have to influence change in vehicle choice (as per 2.6)
- Precise details of how the revenue generated from the proposed emissions levy will be spent
- Other methods by which the council could raise residents' awareness of the impact of emissions from their vehicles on local air quality

6. Witnesses requested

Cllr Ross Garrod, Cabinet Member for Street Cleanliness and Parking

Cllr Judy Saunders, former Cabinet Member for Street Cleanliness and Parking

Chris Lee, Director of Environment and Regeneration, LB Merton

John Hill, Head of Public Protection, LB Merton

Paul Walshe, Head of Parking and CCTV Services, LB Merton

Lisa Hawtin, Kevin Turpin, Anna Savage and Jason Andrews, Authors of the Transport & Travel Research Ltd. proposal prepared in partnership with the London Borough of Merton

Representative of Wimbledon Union of Residents' Associations (WURA)

Sally Gibbons, Chair of the Edge Hill Residents' Association

Representatives of The Alliance of British Drivers; the RAC Foundation;
and the AA

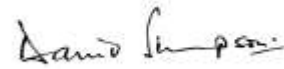
7. Signed (not required if sent by email):



Cllr Daniel Holden



Cllr Abdul Latif



Cllr David Simpson

8. Notes – see part 4E section 16 of the constitution

Call-ins must be supported by at least three members of the Council.

The call in form and supporting requests must be received by 12 Noon on the third working day following the publication of the decision.

The form and/or supporting requests must be sent:

- **EITHER** by email from a Councillor's email account (no signature required) to democratic.services@merton.gov.uk
- **OR** as a signed paper copy to the Head of Democracy Services, 7th floor, Civic Centre, London Road, Morden SM4 5DX.

For further information or advice contact the Head of Democracy Services on 020 8545 3864

Appendix C

Response to Merton Council call-in request regarding the introduction of a diesel surcharge for all types of resident and business parking permits.

Section 4

1. Proportionality

1.1 Air Pollution is now considered a social, political and health priority and the Mayor of London is currently consulting on urgent measures to address poor air quality and describes the problem as a 'public health emergency' after it was revealed that almost 10,000 Londoners die from long-term exposure to air pollution every year.

1.2 Measures to tackle poor air quality in London are not the sole responsibility of the Mayor and it is expected that every tier of government including local authorities take the action they can to assist, even if this includes difficult and controversial decisions.

1.3 The government has recently been challenged for non-compliance with its own air quality objectives and the new government action plan was recently rejected by the High Court following a further challenge. It is therefore a priority that every tier of government takes the action that it can to help address this urgent problem. Merton, like many local authorities has historically and presently failed to comply with the air quality objectives and the control measures previously taken by the authority have had little impact in driving down pollution.

1.4 The Diesel surcharge is one of a number of measures proposed as part of Merton Council's new Air Quality Action Plan which is currently being drafted and will be subject to public consultation. If people change from the most polluting vehicles it will have a positive impact in reducing air pollution both inside and outside our borough. This approach shows leadership, and indicates a direction of travel for diesel vehicles. In the USA, Volkswagen has announced that they will no longer sell diesel cars. It is reasonable to make the assumption that actions which encourage less diesel car ownership in residential areas will lead to fewer diesel cars in hot spot areas. It is well understood that diesel vehicles contribute more to poor air quality than petrol cars and this fact is recognised by the mayors of four of the world's biggest cities (Paris, Madrid, Athens and Mexico City) who are set to ban diesel

vehicles from their centres within the next decade, as a means of tackling air pollution, with campaigners urging other city leaders to follow suit.

1.5 It is right to say that diesel vehicles in Controlled Parking Zones (CPZs) are one of many sources of vehicle emissions in the borough however it is one of the few sources of emissions which the council has the ability to control. It is correct to say that if everyone who owns a diesel vehicle in a CPZ bought a permit with the surcharge added on, it would not single-handedly reduce air pollution rather, the funds generated would be available to mitigate the pollution created. With regard to the suggestion of a wider levy being applied to all borough residents who are owners of all diesel vehicles, this simply is not possible since local authorities are not required to hold details of vehicle ownership nor do we currently have the legal power. In addition, it should be noted that this is not just a Merton problem as these cars can, it is assumed, drive beyond the borough boundary causing air pollution across London and beyond. By taking this action we are assisting in the Capital's drive to improve quality.

1.6 The behaviour we want to change is the ownership and use of diesel vehicles in London. The proposed surcharge does not go far enough to tackle the massive problem we face but it is incorrect to state that it does not target the behaviour which is causing the borough's air pollution. If this policy encourages motorists to sell or change their cars for less polluting models it will have had a beneficial impact. If residents are not using their diesel vehicles very much then the nudge to change behaviour may be felt more greatly and encourage the changes required more effectively and quickly. We currently do not have the powers or through traffic or off-road parking. What we are seeking to address is those matters within our direct control.

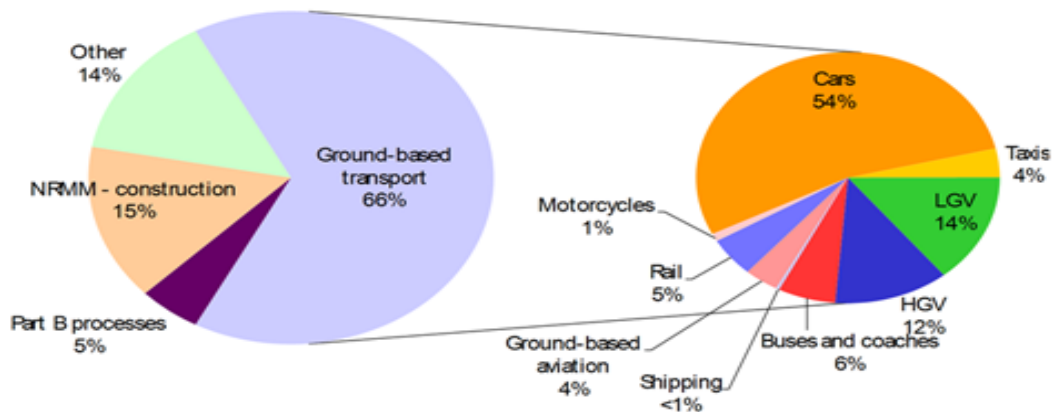
1.7 An estimated 30% of the borough's CPZs are adjacent to the current air quality hotspots within the borough. It should be noted that there are some small sections of main through routes around South Wimbledon/Colliers Wood and Morden Town Centre that are TfL Red Routes but the majority are LB Merton roads.

1.8 Respiratory disease - In 2013, mortality (see Appendix 7) from respiratory disease accounted for 180 (rounded to nearest 10) of recorded deaths; this equates to 15% of all deaths after the age of 28 days. One of the five wards in Merton that has the highest mortality rates from respiratory diseases (data 2011-2014) is Colliers Wood which is located within one of the air quality hotspots within the borough as well as containing a significant number of CPZs.

Emissions source apportionment for London which demonstrates the principal sources of air pollution in Merton

The data below demonstrates that there is a high degree of damaging air pollution from diesel vehicles. It is accepted that there is pollution caused by other vehicles that pass through the borough. However, we have no immediate powers at our disposal to tackle these and so we are focussing on what we can do.

Particulate Matter (PM)



Nitrogen Dioxide (NO2)

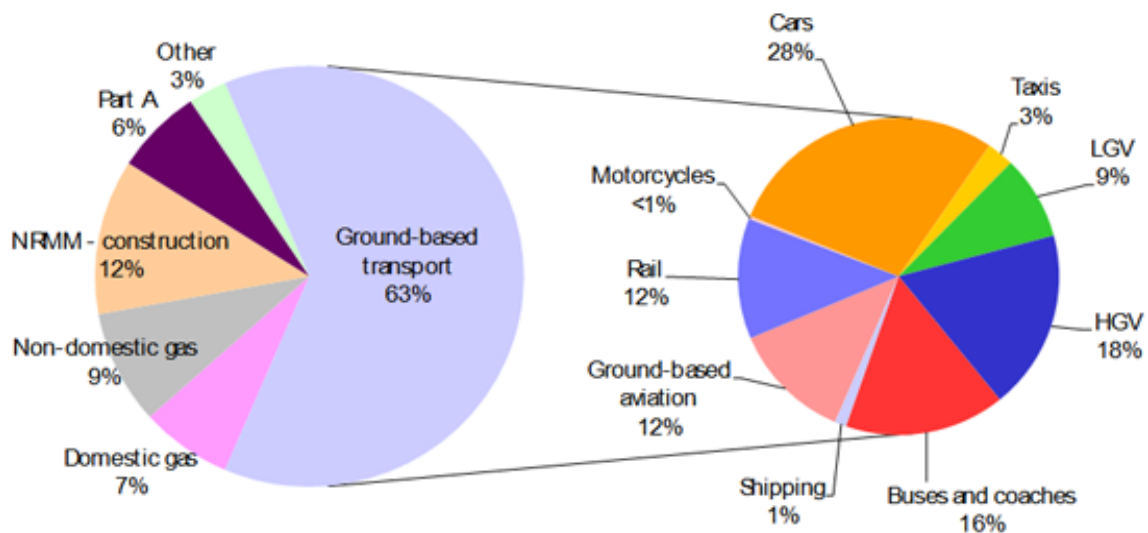


Table 1. Annualised emissions for 2015 from the London Atmospheric Emissions Inventory in Merton in tonnes per year

Vehicle type	Emissions (t/y)		
	CO2	NOx	PM10 exhaust
Motorcycle	1395.7	1.4	0.1
Taxi	1976.6	7.4	0.3
Petrol Car	48566.8	30.1	0.6
Diesel Car	42063.4	141.2	3.3
Petrol LGV	522.9	0.8	0.0
Diesel LGV	13971.1	49.0	1.6
London Bus	8745.4	49.6	0.3
Coach	3100.4	21.7	0.2
Rigid HGV	11484.7	63.6	0.4
Articulated HGV	3396.4	13.8	0.1

1.9 This data shows that the highest emissions are from cars which reflect their dominance in the vehicle fleet. For CO2 emissions, there is a similar contribution from both petrol and diesel cars (around 30-35% each). The next highest contribution is from diesel light goods vans (LGVs) and diesel rigid Heavy Goods Vehicles (HGVs). For NOx and PM10 exhaust emissions, it is the diesel cars that dominate emissions.

Nitrogen Oxides (NOx) and Particulate Matter (PM10) exhaust emissions, It is the diesel cars that dominate emissions in the borough.

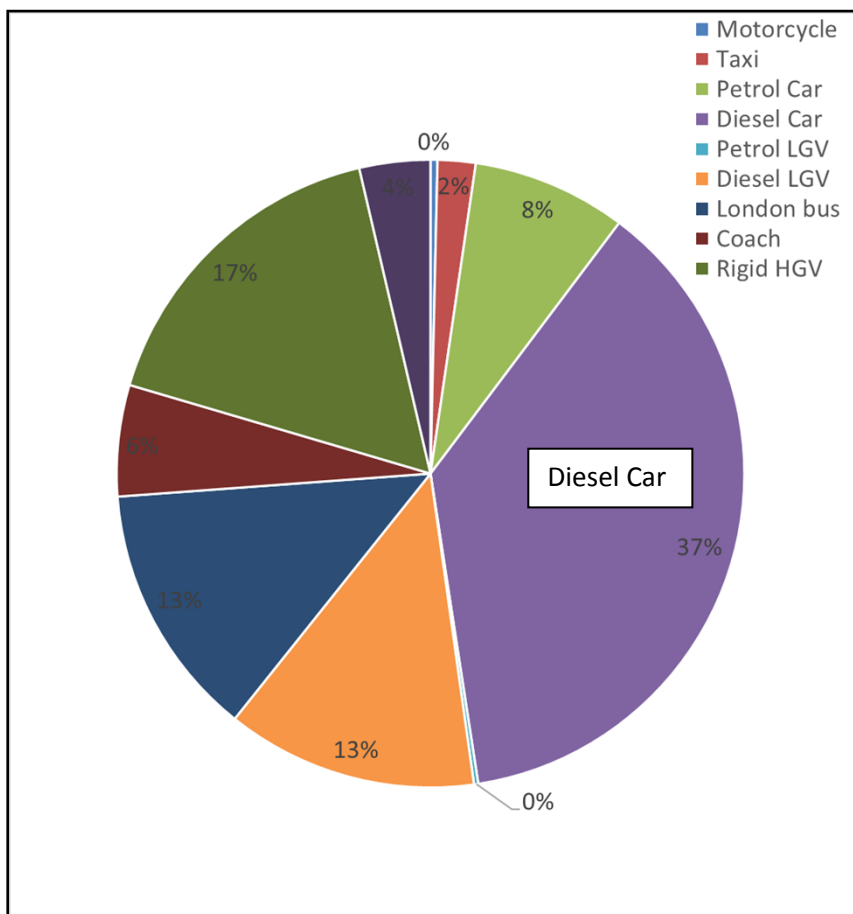


Table 2. Division of current Merton residential permit vehicles into emission bandings.

Vehicle	Engine Size or Gross Vehicle Weight (GVW)	Low emissions			High emissions	
		Band 1	Band 2	Band 3	Band 4	Band 5
Petrol car	<1400 cc	0	1,316	2,449	55	26
Petrol car	1400-2000 cc	0	1,005	3,417	76	48
Petrol car	>2000 cc	0	0	940	127	69
Diesel car	<1400 cc	0	0	1	108	0
Diesel car	1400-2000 cc	0	0	168	2,811	0
Diesel car	>2000 cc	0	0	81	664	959
Petrol car derived van	1400-2000 cc	0	0	1	0	2
Diesel car derived van	<2000 cc	0	0	0	83	0
Petrol Van	<3.5t	0	4	9	0	9
Diesel van	<3.5t	0	0	0	0	264
Electric	Electric	5	0	0	0	0
Grand total						14,697*

1.10 For this part of the study vehicles holding an existing parking permit were divided into the following 5 bandings, based on emissions:

- Band 1 (Zero emission vehicles) Electric
- Band 2 (<10 g/km combined NOx/CO2)
- Band 3 (<90 g/km combined NOx/CO2)
- Band 4 (<170 g/km combined NOx/CO2)
- Band 5 (>170 g/km combined NOx/CO2)

The vehicle bandings were applied to the existing vehicle base case fleet. The chart shows that the most polluting vehicles will be those captured by the levy.

1.11 Imposing the diesel surcharge is one of the few direct influences that local authorities have to change driver behaviour. The model used averaged the usage of a vehicle and this was based upon the assumption of 'normal' driving behaviour. It would have been impractical to contact all owners of diesel vehicle to request and scrutinise their vehicle mileage. The strategy not only helps improve Merton's air quality but it also contributes towards a pan London improvement.

1.12 The GLA (Appendix 6) has applauded Merton's leadership over in introducing this measure and they believe that the approach being taken by Merton and other London boroughs will help broaden its appeal.

2. Due consultation and the taking of professional advice from officers

2.1 The proposal has been included as part of the budget setting process from late 2015 and considered by Sustainable Communities and Transport Scrutiny Panel as well as Overview and Scrutiny Commission as part of the budget setting process before proceeding to Cabinet and Council in early 2016 as part of the budget setting process and MTFS . The proposed policy approach was also covered in pre-decision scrutiny on 7th September 2016.

2.2 We are giving notice that the charge will be £150 in 2 years so that motorists are given time to adjust to this increased charge. As part of this measure we are offering a discounted rate which will increase incrementally over 2 years to allow changes in behaviour / ownership to be made.

2.3 We will undertake public consultation and implement a communications campaign to publicise the changes which will take place via the statutory requirement¹ to advertise any changes to existing Traffic Management Orders.

2.4 These proposed changes would be introduced under Sections 6 and 46 of the Road Traffic Regulation Act 1984, and the Order making process would be carried out using the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 (S.I. 1996/No. 2489).

2.5 The statutory consultation process requires the Council to advertise in a local newspaper and, if necessary, in the London Gazette. A minimum of 21 days for representation is required. In addition to this, we would also consult all ward members, resident & business associations and advertise the Council's intentions on its website and in My Merton (subject to publication date).

2.6 Because the health based air quality standards are being exceeded for nitrogen dioxide in parts of the borough, the Council is also statutorily obliged to consult the public in respect of any changes to its Air Quality Action Plan.²

2.7 The surcharge is intended to change residents' behaviour and it is felt that delaying its introduction for one year would not incentivise that change. We intend to review the policy after two years where the numbers of vehicles and their impact can be assessed. At the end of this review period the matter will be referred back to Scrutiny Committee to consider the matter before referring it to Cabinet for

¹ Sections 6 and 46 of the Road Traffic Regulation Act 1984, Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996

² Part IV of the Environment Act 1995.

consideration. Options at that time could include: keeping, amending or scrapping the policy.

2.8 Whilst we recognise that this represents an increased charge to some motorists, the £90 initial surcharge needs to be considered in the context of the total cost of running a car as well as the relatively low levels of residents' charges in Merton compared to other boroughs.

2.9 With regards to the 4 points raised by the TTR report we considered the following.

1. A review period of 2 years was agreed as the 5 year period was considered too long,.
2. See section of the TTR report, there will still be an option to address this after the 2 year period.
3. Financial analysis is included in the document
4. This was considered and felt to be impractical, exceptionally costly and counter-productive. The change in behaviours can be assessed during and after the 2 year review period.

3. Respect for human rights and equalities

3.1 An Equality Analysis (Appendix 2) has been carried out which concluded that the policy is robust and shows no potential for discrimination.

4. A presumption in favour of openness

4.1 The policy was trailed in 2015 budget setting process and referred to Scrutiny for pre-decision scrutiny for the purposes of transparency and openness .

4.2 The proposed emissions levy is part of the Council's wider strategy to improve air quality and it is one of a number of control measures contained in the Air Quality Action Plan (AQAP) which we are statutorily obliged to consult residents and businesses on. Part of that consultation will seek to understand the preference of vehicle owners to either pay a higher permit charge or change their vehicle to pay a lower permit tariff. In addition, we also intend to review the policy after two years.

5. Clarity of aims and outcomes

5.1 By law, any revenue generated must be used for transport related purposes including measures to improve air quality. These can include tree planting, promoting sustainable transport and other measures e.g. a contribution to concessionary fares, day-to-day carriageway and footway maintenance.

5.2 It is very difficult to determine the extent of change that this policy will deliver. There are a number of factors that influence car owners to change their vehicles, and these include: personal circumstance, age of the vehicle and efficiency. Therefore any change must be sufficient to drive change and not be easily absorbed as part of normal car ownership.

5.3 With regards to the £25 discounted tariff for electric vehicles, it should be recognised that an Ultra Low Emission Vehicle (ULEV) is still a car and will impact upon roads and congestion and available parking spaces in resident and shared use parking bays where permit holders and others can park. The Council still has to cover its reasonable costs associated with the management of CPZs e.g. staff, pay & display machines and yellow lines. Cycling and walking are still the most desirable modes of transport. The Council is introducing electric charging points at On Street parking locations with the aim to encourage car drivers to move away from combustion engines to electric powered motors.

6. Consideration & evaluation of alternatives

6.1 There are very few alternatives within our control. Consideration was originally given to a wider emission levy to incorporate all vehicles. However, emissions' charging is now to a large extent, overtaken by Vehicle Excise Duty. Recognising this, it was considered more appropriate to focus on diesel cars as they produce disproportionately higher emissions of local air quality pollutants, such as nitrogen oxides and particulates which are most harmful to health. The policy also allows for a change to petrol vehicles as a readily available, low cost option for those residents and businesses currently unable to make the transition straight to zero emissions technologies. The proposed 2 year review period will consider potentially extending the charge to incorporate all vehicles subject to residential parking fees as well as allowing a broader review of emissions based charging as an option.

6.2 Recent research undertaken by the Department for Transport shows that on average Euro 6 diesel NO₂ emissions are 6 times higher than the limit for Euro 6. The new drive cycles which include an element of real world emissions testing have not been agreed yet and at best will impact on vehicles sold from 2019 onwards. This can be addressed in the two year policy review period.

6.3 A Euro 4 petrol vehicle has similar Nitrogen Oxide (NOx) emissions standard as a current Euro 6 diesel based on the current drive cycle. Petrol vehicles are much cleaner than diesel, when you take into account the deeply flawed nature of the emissions testing on diesel cars, the case for excluding diesel is even stronger.

6.4 There is little difference from a NOx point of view between a Euro 6 petrol and an electric vehicle (EV). This is because Euro 6 petrol has such low NOx levels. EVs should be promoted for CO2 reasons. Before Merton encourage the on street parking of EVs there would need to be a mechanism for charging them. At present there is no such mechanism in Merton for developing an on street charging network. Perhaps a few years into the Go Ultra Low Cities research, when more is known about the needs of EV users this could be explored. At present it is fair to say that there are still some unknowns about how On Street residential charging should be supported.

6.5 The Council currently has no legal power to levy a borough wide surcharge outside of the Controlled Parking Zones.

7. Documents requested (see appendices)

Appendix 1 – Equality Analysis

Appendix 2 – Risk Analysis

Appendix 3 – Financial Analysis

Appendix 4 - Comparison with other London boroughs emission schemes

Appendix 5 - Letter from the GLA

Appendix 6 – Respiratory Disease

Appendix 7 - Emails

Appendix 8 - Notes of meetings



Equality Analysis

06 E&R Parking Services (Ref No. TBC)

What are the proposals being assessed?	Development of an emissions based charging Policy for resident/business permits
Which Department/ Division has the responsibility for this?	Envf & Regeneration /Public Protection/Parking and CCTV Services

Stage 1: Overview	
Name and job title of lead officer	Paul Walshe Head of Parking and CCTV Services
1. What are the aims, objectives and desired outcomes of your proposal? (Also explain proposals e.g. reduction/removal of service, deletion of posts, changing criteria etc)	To encourage cleaner air quality and contribute to the public health agenda
2. How does this contribute to the council's corporate priorities?	To improve the health of the Community.

3. Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc.	Residents and Businesses who purchase a parking permit
4. Is the responsibility shared with another department, authority or organisation? If so, who are the partners and who has overall responsibility?	The responsibility is not shared with any other department. The section will work closely with the Shared Regulatory Service Pollution Team when implementing the proposal.

Stage 2: Collecting evidence/ data

5. What evidence have you considered as part of this assessment?

Provide details of the information you have reviewed to determine the impact your proposal would have on the protected characteristics (equality groups).

- It is not believed that levels of vehicle emissions have a correlation with motorists with protected characteristics. If, during the implementing of the policy, it becomes evident that this is not the case, this assessment will be reviewed.
- Residents in possession of a “Blue Badge” will be exempt from the surcharge.

Stage 3: Assessing impact and analysis

6. From the evidence you have considered, what areas of concern have you identified regarding the potential negative and positive impact on one or more protected characteristics (equality groups)?

Protected characteristic (equality group)	Tick which applies		Tick which applies		Reason Briefly explain what positive or negative impact has been identified
	Positive impact		Potential negative impact		
	Yes	No	Yes	No	
Age		X		X	
Disability		X		X	No surcharge will be applied to a vehicle used by a Blue Badge holder
Gender Reassignment		X		X	
Marriage and Civil Partnership		X		X	
Pregnancy and Maternity		X		X	
Race		X		X	
Religion/ belief		X		X	
Sex (Gender)		X		X	
Sexual orientation		X		X	
Socio-economic status		X		X	

7. Equality Analysis Improvement Action Plan template – Making adjustments for negative impact

This action plan should be completed after the analysis and should outline action(s) to be taken to mitigate the potential negative impact identified (expanding on information provided in Section 7 above).

Negative impact/ gap in information identified in the Equality Analysis	Action required to mitigate	How will you know this is achieved? e.g. performance measure/ target)	By when	Existing or additional resources?	Lead Officer	Action added to divisional/ team plan?
N/A						
N/A						
N/A						

Note that the full impact of the decision may only be known after the proposals have been implemented; therefore it is important the effective monitoring is in place to assess the impact.

Stage 4: Conclusion of the Equality Analysis

8. Which of the following statements best describe the outcome of the EA (Tick one box only)

Please refer to the guidance for carrying out Equality Impact Assessments is available on the intranet for further information about these outcomes and what they mean for your proposal

OUTCOME 1

OUTCOME 2

OUTCOME 3

OUTCOME 4

Stage 5: Sign off by Director/ Head of Service

Stage 5: Sign off by Director/ Head of Service

Assessment completed by	Paul Walshe Head of Parking and CCTV Services	Signature:	Date: 10th Nov 2015
Improvement action plan signed off by Director/ Head of Service	John Hill Head of Public Protection	Signature:	Date:

Appendix 2

Risk Analysis

Service/Section	Parking Services	2017/18 Saving £000	2017/18 Risk Status (RAG)
Description	Development of emissions based charging policy for resident/business permits recognising the damage particularly from diesel engined motor vehicles.	250	A
Service Implication	Will have no impact on service - same volume of permits will still be issued but greater variety. Links with DVLA will provide information.		
Staffing Implications	Initially resource intensive to develop policy, but there after little impact expected.		
Business Plan implications	Will encourage cleaner air quality and contribute to public health agenda.		
Impact on other departments	Potential impact initially on EH (P) team during development of policy.		
Equalities Implications	None anticipated as vehicle emissions has no known correlation with equalities groups.		

Appendix 3

Financial Analysis

Permit Type	Number of permits currently issued	Number of Diesel vehicles	Current first permit charges PA	Phased Introduction at £100			Phased Introduction at £90		
				Surcharge 2017/18 £100	Surcharge 2018/19 £125	Surcharge 2019/20 £150	Surcharge 2017/18 £90	Surcharge 2018/19 £115	Surcharge 2019/20 £150
Resident Parking Permit	16,136	5,486	£65	£548,600	£685,750	£822,900	£493,740	£630,890	£822,900
Business Parking Permit	523	182	£752 inner zones £662 outer zones	£18,200	£22,750	£27,300	£16,380	£20,930	£27,300
Trades Permit	211	73	£900 (Full Year) £600 (6 months) £375 (3 months) £150 (1 month) £50 (1 week)	£7,300	£9,125	£10,950	£6,570	£8,395	£10,950
Total	16,870	5,741		£574,100	£717,625	£861,150	£516,690	£660,215	£861,150

Appendix 4

Comparison with other London boroughs' emissions schemes

Borough	Emissions permit price range (per annum)	Diesel surcharge
Islington	£17 to £449	£96 flat rate
Camden	£85.80 to £282.47	£20.60 to £59.73 depending upon emissions band
Kensington & Chelsea	£78 to £214	£40 flat rate

Appendix 5
Letter from the GLA

GREATERLONDONAUTHORITY
Development, Enterprise and Environment

Chris Lee

5th December 2016

Director of Environment & Regeneration

London Boroughs of Merton and Richmond upon

Thames

Civic Centre

London Road

Morden

SW 5DX

Dear Chris,

I am writing regarding Merton's plans to introduce a residential parking permit surcharge for diesel vehicles and heavy discounts for electric vehicles.

Addressing London's pollution problem is a key priority for the Mayor, which is why he is proposing the boldest set of air quality measures of any major city, including:

- **Implementing an Emissions Surcharge (dubbed the 'T-charge') on older polluting vehicles entering central London in Congestion Charging hours from 2017.**
- **Bringing forward the introduction of the Ultra Low Emission Zone (ULEZ) in central London from 2020 to 2019.**
- **Extending the ULEZ beyond central London in 2019 or later: for motorcycles, cars and vans, to the North and South Circular roads; for lorries, buses and coaches, London-wide.**

TfL are currently consulting on these proposals, including a statutory consultation on the T-charge,

and I would invite you to contribute via www.tfl.gov.uk/airquality-consultation by 18th December 2016.

The Mayor also expects TfL to lead by example with a comprehensive plan to transform the capital's bus fleet. This includes:

- Making sure all double decker buses operating in the central Ultra Low Emission Zone comply a year earlier by 2019, meaning each of the 3,100 double-deck buses operating in the zone will be Euro VI hybrid and roughly 300 single-deck buses will be zero emission at tailpipe.
- Expanding the ULEZ retrofit programme to 5,000 buses in total, so all buses meet the Euro VI standard.
- Aiming to procure only hybrid or zero-emission double-deck buses from 2018.
- Introducing Low Emission Bus Zones tackling the worst pollution hotspots by concentrating cleaner buses on the dirtiest routes.

However, air quality is such a major health crisis that these bold measures alone will not deliver the necessary reductions in pollution. We need all tiers of Government to play their part; the Mayor has recently written to the Secretary of State for Environment, Food and Rural Affairs detailing a list of action and support that is required at the national level.

Local authorities also have a key role to play. Through the new London Local Air Quality Management (LLAQM) framework boroughs are required to monitor pollution and take action to reduce it. Parking is one of the key levers that local authorities have at their control, and differential parking charges are a way in which councils can send a message to drivers to purchase cleaner vehicles. Your plan to take this step highlights your commitment to LLAQM.

We have learned from feedback from other boroughs who have delivered these kinds of interventions that it is important to clearly communicate the reasons for the revised charges to residents, and that it is also important to ensure that the price differential is significant enough to impact on behaviour. I look forward to hearing from you about the impact of initiative once implemented.

If you have any questions or would like any further information please contact my colleague poppy.lyle@london.gov.uk, who looks after our LLAQM framework.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Elliot Treharne', written over a light grey grid background.

Elliot Treharne
Air Quality Manager

Appendix 6 Respiratory Disease Data

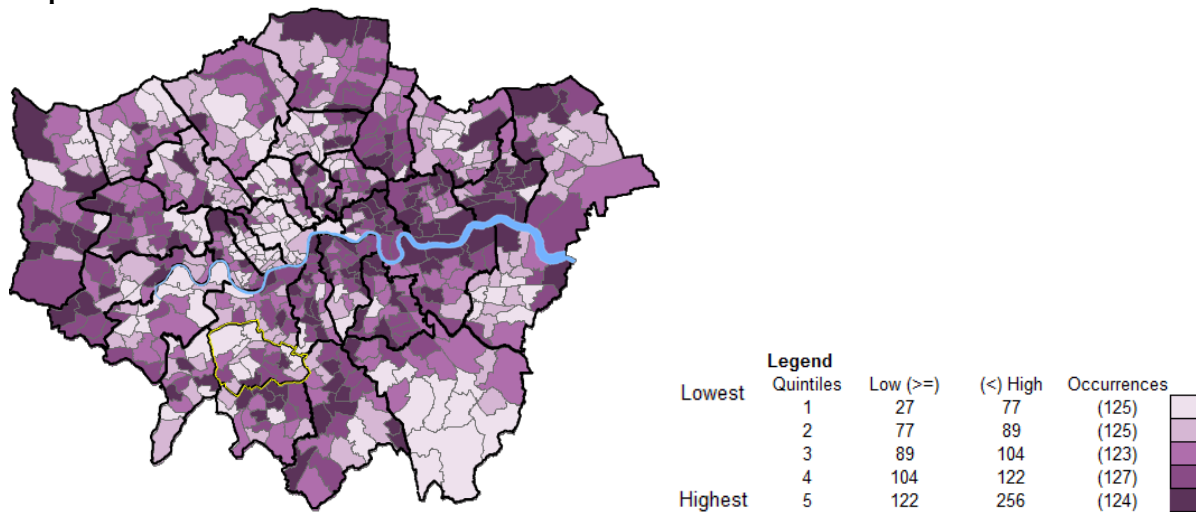
December 10th, 2015

Respiratory disease

In 2013, mortality from respiratory disease accounted for 180 (rounded to nearest 10) of recorded deaths; this equates to 15% of all deaths after the age of 28 days.

Standardised mortality ratio for respiratory diseases (ICD10 J00-J99), all ages, persons (2008 – 2012), by ward in London

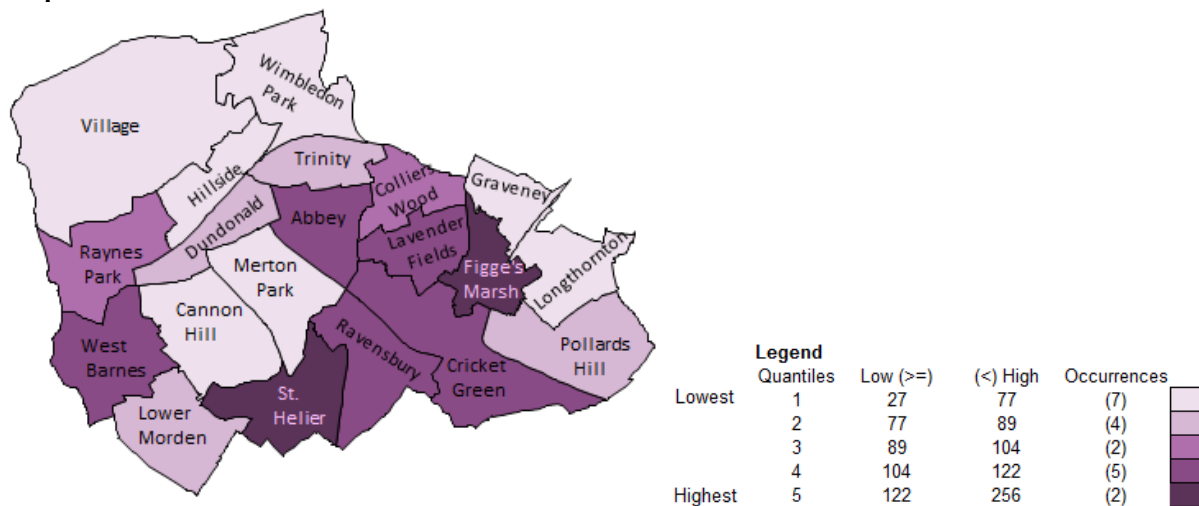
Map 1



Source: Public Health England, Local Health (www.localhealth.org)

Standardised mortality ratio for respiratory diseases (ICD10 J00-J99), all ages, persons (2008 – 2012), by ward in Merton

Map 2



Source: Public Health England, Local Health (www.localhealth.org)

Metric

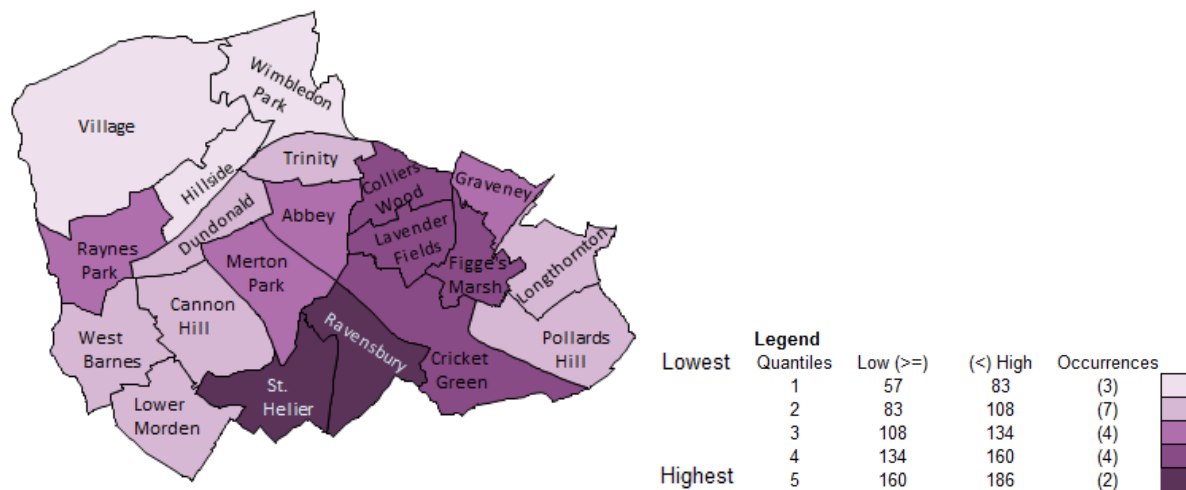
Mortality data by sex and five-year age group were extracted from annual files supplied to Public Health England (PHE) by the Office for National Statistics (ONS). The deaths were registered in the calendar years 2008-12 and allocated to the deceased's output area (OA) of usual residence using the November 2013 version of the National Statistics Postcode Lookup. Counts of deaths for years up to and including 2010 were adjusted to take account of the ICD-10 coding change introduced in 2011. Population data are mid-year population estimates for OAs, by sex and quinary age group, supplied by ONS. OA deaths and population estimates were aggregated to higher geographies using standard geographical lookup tables obtained from ONS Geography.

Expected deaths were calculated by applying age-specific death rates for England in 2008-12 to each area's population.

$$SMR = (\text{Observed total deaths in the area} / \text{Expected deaths}) \times 100$$

Directly standardised mortality ratio for respiratory diseases (ICD10 J00-J99), all ages, persons (2011 – 2014), by ward in Merton

Map 3



Source: Primary Care Mortality Database (PCMD) via Open Exeter

Metric

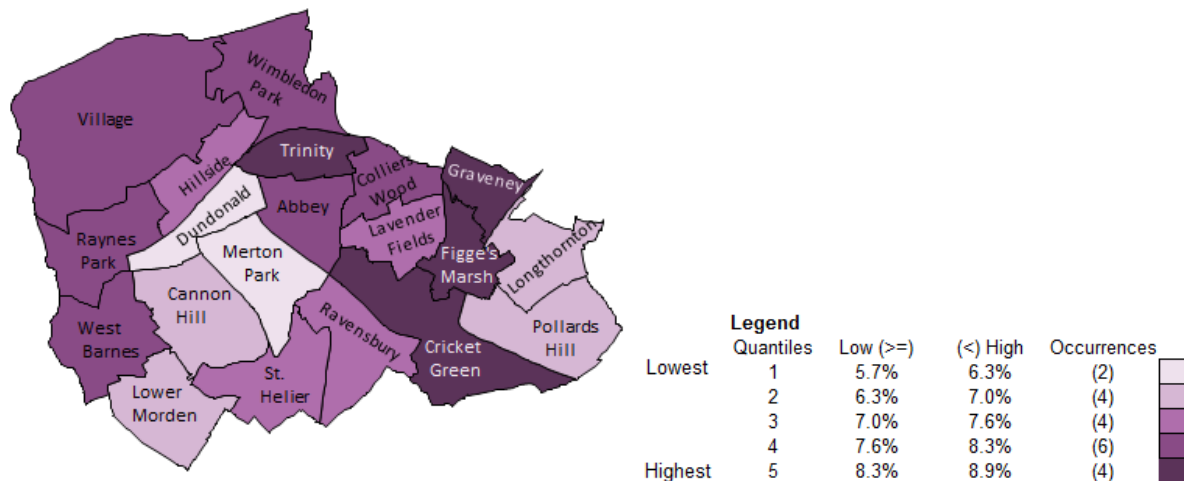
Mortality data by age and sex were extracted from the PCMD. The deaths occurred in the calendar years 2011 to 2014 and allocated to the deceased’s ward of usual residence. The population estimates used in the calculation were the Greater London Authority 2013 round of estimates for wards by quinary age group for the years 2011 to 2014.

The age-specific mortality rates were calculated for each quinary age-band.

$$\text{DSR per 100,000} = \text{Sum of (age-specific mortality rate} \times \text{European standard population)}$$

The proportion of the ward's elective + emergency admissions for respiratory diseases (ICD10 J00-J99), all ages, persons (2013/14 and 2014/15), by ward in Merton

Map 4



Source: SUS extract

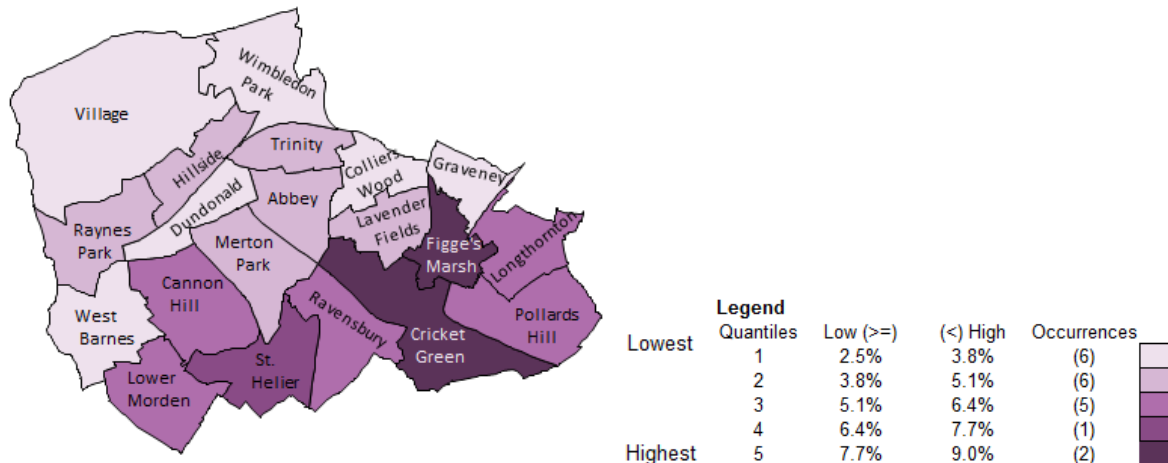
Metric for ward

The proportion of elective and emergency admissions for respiratory conditions (ICD10 J00-99) 2013-14 to 2014/15 (2-year pooled) as a percentage of all elective and emergency admissions in the ward.

Note: the denominator is the number of all elective and emergency admissions in each individual ward in Merton.

The proportion of Merton's elective + emergency admissions for respiratory diseases (ICD10 J00-J99), all ages, persons (2013/14 and 2014/15), by ward in Merton

Map 5



Source: SUS extract

Metric

The proportion of elective and emergency admissions for respiratory conditions (ICD10 J00-99) 2013-14 to 2014/15 (2-year pooled) as a percentage of all elective and emergency admissions for respiratory conditions in Merton.

Note: the denominator is the number of all elective and emergency admissions in Merton as a whole.

The ward of Graveney had the lowest number of admissions (103 = 2.5%) and the ward of *Cricket Green* had the highest number of admissions (368 = 9.0%).

Conclusion

The five wards in Merton that have the highest mortality rates from respiratory diseases (data 2011-2014) are:

St Helier, Ravensbury, Colliers Wood, Figge's Marsh, and Lavender Fields

The five wards in Merton that have the highest mortality rates from respiratory diseases (via *Local Health* data 2008-2012) are:

St Helier, Figge's Marsh, Ravensbury, Abbey, and Lavender Fields

London boroughs



Appendix 7

Emails

From: Chris Lee

Sent: 08 November 2016 09:16

To: John Hill; Paul Walshe

Subject: RE: Reports for LSG Diesel emission surcharge

Thanks , the surcharge columns on 2nd table add nothing nor does the final column really so I suggest deleting those

Simplify first table by only including the 3 permits we will actually only add surcharge to

Comms needs to deal with the council fleet as well

Chris

From: John Hill

Sent: 07 November 2016 18:32

To: Chris Lee; Paul Walshe

Subject: FW: Reports for LSG Diesel emission surcharge

Chris/Paul,

Just checked back to the 7th September O&S agenda and can confirm that the appendix 2 which details a whole range of options was part of the papers for that meeting. This means that the revised schedule that we are now tabling tonight is amended from that considered at O&S on 7th September. I think unless it was already explained at the meeting on the 7th, we simply say that the original appendix 2 was intended to give members an idea of the level of charge that could be applied to all categories of permit, including the 3 that we are now proposing.

John (H)

From: Paul Walshe
Sent: 08 November 2016 08:09
To: Chris Lee; John Hill
Cc: Sophie Poole
Subject: RE: Diesel surcharge

Chris

Noted we also need to meet with Paul Mc to discuss changing the TMOs as this will need some considerable lead in time.

Paul

----Original Message-----

From: Chris Lee

Sent: Tuesday, November 08, 2016 07:54 AM GMT Standard Time

To: John Hill; Paul Walshe

Cc: Sophie Poole

Subject: Diesel surcharge

Could you please finalise the report and clear via Cllr Garrod today .

In particular :

- Make clear in the report that the surcharge applies to the specific permits we discussed
- Bring the 2 charge options into the recommendations so members can select either a or b in the recs
- In appendix 2 amend to show just the permit prices for the other boroughs - I am not sure what the surcharge columns are for but they don't add anything .
- Discuss with Sophie the comms messages and whether we issue a press statement or just react to press inquiries

I am in meetings till 12 then most of pm .happy to discuss

Thanks

Chris

From: Paul Walshe
Sent: 04 October 2016 09:31
To: Councillor Ross Garrod
Cc: John Hill; Chris Lee
Subject: RE: Diesel Emissions Vehicles
Attachments: Diesel surcharge OS Report FINAL august 26 16.doc; TTR Merton Parking Project DIESEL report v110 ja.docx

Councillor,

I have left a copy of the borough map in your post box in the majority room, the map shows CPZ's and over laid are the ward boundaries. It should be noted that the map was up to date as of the 30th September but new CPZ's will continue to come on line between now and March 2017 and into the 2017 2018 financial year.

From the information in the attached TTR report it shows that 34% of Resident parking permits are for diesel vehicles, another point worth noting is that the number of resident permits have increased from 14,703 to the current number of 16,575 the difference in numbers is due to the increase in CPZ's since this report was commissioned.

Using the figure 34% of 16,575 then the average for each of the current 43 CPZ's is 5,635 for all CPZ's with an average of 131 for each CPZ.

I have attached for your information the **TTR** report and the OS report that went to Overview and Scrutiny.

Hope that helps any further questions please let me know.

Paul.

Paul Walshe

Head of Parking and CCTV Services

London Borough of Merton

0208 545 4189

Paul.Walshe@Merton.Gov.UK

From: Councillor Ross Garrod

Sent: 03 October 2016 13:20

To: Paul Walshe

Cc: John Hill; Chris Lee

Subject: RE: Diesel Emissions Vehicles

Thank you Paul for this. A rough estimate would suffice.

Best wishes

Ross

-----Original Message-----

From: Paul Walshe

Sent: Monday, October 03, 2016 11:59 AM GMT Standard Time

To: Councillor Ross Garrod

Cc: John Hill; Chris Lee

Subject: Diesel Emissions Vehicles

Councillor,

Thanks for your phone call last week, I have as requested obtained a drawing showing the CPZ's overlaid with the ward boundaries.

The area I am struggling with is the exact number diesel vehicles in each of the ward/CPZ boundaries the reason was that when this report was commissioned from external sources they

took a copy of the Parkings permit data using only the VRM (car registrations) the reason was that because of data protection we excluded personal details such as names and addresses.

The best I can achieve in the time frame (this week) is just to average the number of vehicles affected across all wards, is that sufficient.

I have attached the latest response from the consultants regarding this matter.

Paul.

Paul Walshe

Head of Parking and CCTV Services

London Borough of Merton

0208 545 4189

Paul.Walshe@Merton.Gov.UK

From: Paul Walshe

Sent: 04 October 2016 09:31

To: Councillor Ross Garrod**Cc:** John Hill; Chris Lee

Councillor,

I have left a copy of the borough map in your post box in the majority room, the map shows CPZ's and overlaid are the ward boundaries. It should be noted that the map was up to date as of the 30th September but new CPZ's will continue to come on line between now and March 2017 and into the 2017/2018 financial year.

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I have attached for your information the TTR report and the OS report that went to Overview and Scrutiny. Hope that helps any further questions please let me know.

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Paul Walshe

Head of Parking and CCTV Services

London Borough of Merton

0208 545 4189

Paul.Walshe@Merton.Gov.UK

From: Councillor Ross Garrod

Sent: 03 October 2016 13:20

To: Paul Walshe

Cc: John Hill; Chris Lee

Subject: RE: Diesel Emissions Vehicles

Thank you Paul for this. A rough estimate would suffice.

Best wishes

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From: Paul Walshe
Sent: Monday, October 03, 2016 11:59 AM GMT Standard Time
To: Councillor Ross Garrod
Cc: John Hill; Chris Lee
Subject: Diesel Emissions Vehicles

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The area I am struggling with is the exact number diesel vehicles in each of the ward/CPZ boundaries the reason was that when this report was commissioned from external sources they took a copy of the Parkings permit data using only the VRM (car registrations) the reason was that because of data protection we excluded personal details such as names and addresses.

The best I can achieve in the time frame (this week) is just to average the number of vehicles affected across all wards, is that sufficient.

I have attached the latest response from the consultants regarding this matter.

Paul.

Paul Walshe
Head of Parking and CCTV Services
London Borough of Merton
0208 545 4189
Paul.Walshe@Merton.Gov.UK

From: Councillor Ross Garrod
Sent: 13 October 2016 12:31
To: Paul Walshe
Cc: John Hill; Jim Rogers; Paul Foster; Jason Andrews
Subject: RE: Diesel Car Proposal

Dear Paul

Thank you for the response.

Could you let me know if at all possible the current percentage of permits that are renewed in Feb, March, April, May and June please.

Best wishes

Ross

-----Original Message-----

From: Paul Walshe

Sent: Thursday, October 13, 2016 11:21 AM GMT Standard Time

To: Councillor Ross Garrod

Cc: John Hill; Jim Rogers; Paul Foster; Jason Andrews

Subject: RE: Diesel Car Proposal

Councillor,

Yes that is correct resident permits are renewed based upon the length of time purchase which can be 6 monthly or 12 monthly for example if you purchase your permit to run from the 29th August then it would be up for renewal 6 or 12 months from that date dependant upon the time purchased.

The same rationale applies to business permits except you can only purchase them for a period of 6 months.

Hope that helps

Paul.

Paul Walshe

Head of Parking and CCTV Services

London Borough of Merton

0208 545 4189

Paul.WalsheaMerton.Gov.UK

From: Councillor Ross Garrod
Sent: 13 October 2016 10:08
To: Paul Walshe
Subject: Diesel Car Proposal

Dear Paul,

It may not be your area so I apologise in advance if this is the case. But my understanding is that resident permits are renewed at differing times - they are not all renewed say on 1st April. Is this a correct assertion?

Best wishes

Ross

From: Chris Lee
Sent: 21 September 2016 12:34
To: Paul Foster; Paul Walshe
Subject: Diesel surcharge

I spoke today with Cllr Garrod , he is asking that we defer this to Nov Cabinet as he wants to better understand the impact on car owners and their geographical distribution.

Can you advise what the implications of a month's delay are asap so that I can quickly advise him if it is not feasible for an April introduction.

Thanks

Chris Lee I Director of Environment & Regeneration

London Borough of Merton

Merton Civic Centre, London Road, Morden, Surrey SM4 5DX

Direct: 020 8545 3050 I Switchboard: 020 8274 4901

From: Chris Lee
Sent: 16 August 2016 11:14
To: Jason Andrews; Paul Foster; John Hill; Paul Walshe
Subject: RE: Deisel Levy

Thanks , Would it be possible for us to look at the options for surcharge and a draft report for Scrutiny with the recommended option at next week's DMT alongside the science.

Thanks

Chris

From: Jason Andrews
Sent: 16 August 2016 10:29
To: Chris Lee; Paul Foster; John Hill; Paul Walshe

i Chris

The revenue raising part of the levy is very simple we know the numbers of vehicles so can calculate potential income.

What we can't provide is the information at what rate of Levy will change behaviour, the model in the document looks at behavioural change in Islington which is the only one that has been established long enough.

The influences for change behaviour are too complex to properly assess as these involved individual decision making by vehicle owners. The report does cover this and says that the only real way of doing this is to carry out impact surveys of diesel owners throughout this borough. Having spoken to colleagues that have been through this process the rate of Levy was agreed through the consultation process, where residents, members and businesses have a chance for their say.

Does this help clarify?

What the report does very well is to say we have a problem with these vehicles and paves the way for the introduction of the Levy charge

Kindest regards

Jason Andrews

From: Chris Lee

Sent: 15 August 2016 17:35

To: Jason Andrews; Paul Foster; John Hill; Paul Walshe

Subject: RE: Deisel Levy

Thanks, I have skim read this and the case for change is made and the report is very helpful in that regard. However, it needs to sit alongside the financial case — what level of surcharge creates behaviour change and what are we recommending . I would like this alongside the science when we discuss at DMT otherwise the report is not complete . Could you arrange please.

Many thanks

Chris

From: Jason Andrews

Sent: 15 August 2016 16:48

To: Chris Lee; Paul Foster; John Hill; Paul Walshe

Subject: Deisel Levy

Hello

Please find a re-write for discussion prior to DMT. The important parts are the Executive Summary and Conclusion. I have moved most references to the appendices for ease of reading.

In my view this provides sound justification for the introduction of a diesel levy in Merton, but omits the revenue information which I felt needed to be separate from the pollution case.

Please let me know your thoughts.

Kindest regards

Jason Andrews

EH Pollution Manager

Regulatory Services Partnership

London Boroughs of Merton and Richmond upon Thames

Civic Centre, London Road, Morden SM4 5DX

Tel. 0208 5453859

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From: Chris Lee
Sent: 13 June 2016 09:51
To: Paul Walshe; Jason Andrews; John Hill
Subject: RE: Emissions based parking

Thanks for copying to me .

Whilst I accept that all [non electric] vehicles are polluters , diesel vehicles are the current bete noir and there is growing public awareness and concern about the problems they create and as such a public appetite that we need to do more to .

I am impressed by the Islington results , though it is difficult to isolate cause and effect .

Our permit charges are already very low [worth comparing in any report to show how they compare to others across London] and as such any surcharge has less of an effect on an already modest annual fee .

The report does not say enough about what changes behaviour — which is what this is all about , and I would like a little more input on what level of surcharge would actually drive a change in behaviour and vehicle type . If Islington managed it at £95 on top of an already high feed why do we believe 50 pounds will create any behaviour change here ?

I suggest the report is modelled for 75 and 100 surcharges on diesel vehicles only with zero rated for elec[and hybrid ?]

Any covering report to Members will want to recommend a level of surcharge but give some analysis on different levels and the impact on vehicle owner behaviour .

Perhaps the repport [covering] could also talk about extension of the ULEZ as wll as poss diesel scrappage as other means by which we can change behaviour .

Happy to discuss

Thanks

Chris

From: Jason Andrews

Page 35 of 59

Sent: 08 June 2016 10:41

To: John Hill; Paul Foster; Paul Walshe

Subject: Emissions based parking

Importance: High

Hi all

Please find draft report, in general it looks at the present thinking about parking and emissions charging, the state of AQ in the borough, the make-up of vehicles and provides a number of scenarios and potential impacts (based upon assumptions).

If we go either way; diesel surcharge or banding based, we will need to consider the charge rates, this will be a political decision as to what's considered palatable.

In my view a banding system is fairer and doesn't isolate the large portion of diesel vehicle owners but unless considered carefully by the accountants this could reduce revenue and increase administration.

I would suggest this is limited circulation until you chaps are happy. Any final report you need to be happy with before it goes public.

Kindest regards

Jason Andrews

EH Pollution Manager

From: Paul Walshe
Sent: 01 February 2016 16:37
To: Tom Davis; 'Chesterton, Venn'; Jennifer Bishop
Cc: Jason Andrews; 'Turpin, Kevin I'
Subject: RE: Parking data requirements

Dear All,

This is to confirm Tom's comments this is not about generating revenue this is about the formulation of an emission based policy with particular reference to pollution caused by diesel emissions and concerns parking permits purchased by residents and businesses.

Tom and Jens involvement is purely to provide you with the raw data future estimates on permit data should be directed to me.

Page 36 of 59

Paul.

Paul Walshe

Head of Parking and CCTV Services

London Borough of Merton

From: Tom Davis

Sent: 01 February 2016 14:09

To: Chesterton, Venn; Jennifer Bishop

Cc: Jason Andrews; Paul Walshe; Turpin, Kevin I

Subject: RE: Parking data requirements

Venn,

This is why we can't make any changes to the scheme with the intention of raising revenue

<http://www.dailymail.co.uk/news/article-2373711/Barnet-Council-parking-permits-price-hike-ruled-illegal-stealth-tax.html>

Regards,

Tom

From: Chesterton, Venn [fmailto:Venn.Chesterton@ttr-ltd.com](mailto:Venn.Chesterton@ttr-ltd.com)

Sent: 29 January 2016 14:20

To: Tom Davis; Jennifer Bishop

Cc: Jason Andrews; Paul Walshe; Turpin, Kevin I

Subject: RE: Parking data requirements

Ok, let's do 1.30 on Monday — **I** will set up a conference call and send an invitation.

Outline agenda, please feel free to add other items:

- 1) Introduction (all)

- 2) Residents permit back office mechanism (Merton)
- 3) Overview of current charging regime and revenue (Merton)
- 4) Overview of the study (TTR)
- 5) Data requirements (TTR)
- 6) AOB (all)

Best

Venn

Venn Chesterton

Divisional Manager — Energy & Environment

Transport & Travel Research Ltd

Phone: +44 (0) 20 7953 4069

Mobile: +44 (0) 7751 644597

Skype: venn.chesterton.ttr



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www.ttr-ltd.com

From: Tom Davis [fmailto:Tom.Davis@merton.gov.uk](mailto:Tom.Davis@merton.gov.uk)

Sent: 29 January 2016 14:11

To: Chesterton, Venn <Venn.Chesterton@ttr-ltd.com>; Jennifer Bishop <Jennifer.Bishop@merton.gov.uk>

Cc: Jason Andrews <Jason.Andrews@merton.gov.uk>; Paul Walshe <Paul.Walshe@merton.gov.uk>; Turpin, Kevin I <kturpin@trl.co.uk>

Subject: RE: Parking data requirements

Hi Venn,

Monday before 3pm is fine or any time Tuesday.

2

Kind regards,

Tom Davis I Parking & CCTV Infrastructure Manager

Parking Services I Environment and Regeneration

London Borough of Merton

Merton Civic Centre, London Rd, Morden, Surrey SM4 5DX.

(020) 8545 3073 I 07580 813 888 I

From: Chesterton, Venn [[mailto:Venn.Chesterton\(@ttr-ltd.com\)](mailto:Venn.Chesterton(@ttr-ltd.com))]

Sent: 27 January 2016 16:43

To: Jennifer Bishop; Tom Davis

Cc: Jason Andrews; Paul Walshe; Turpin, Kevin I

Subject: RE: Parking data requirements

Hi Jennifer.

Yes, and that may give enough time for data Tom has requested to be delivered.

Kevin and I are both free next Monday early afternoon or Tuesday most of the day.

Best

Venn

Venn Chesterton

Divisional Manager— Energy & Environment

Transport & Travel Research Ltd

Phone: +44 (0) 20 7953 4069

Mobile: +44 (0) 7751 644597

Skype: venn.chesterton.ttr



Transport & Travel Research Ltd.

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Offices at Bristol, Didcot, Edinburgh, Lichfield, London and Nottingham.

Transport & Travel Research Ltd is registered in the UK No. 2667976
Registered Office: Garrick Suite, 15 Market Street, Lichfield WS13 6.1X

From: Jennifer Bishop (<mailto:Jennifer.Bishop@merton.gov.uk>)

Sent: 27 January 2016 16:25

To: Tom Davis <Tom.Davis@merton.gov.uk>; Chesterton, Venn <Venn.Chesterton@ttr-ltd.com>

Cc: Jason Andrews <Jason.Andrews@merton.gov.uk>; Paul Walshe <Paul.Walshe@merton.gov.uk>; Turpin, Kevin I <kturpin@trl.co.uk>

Subject: RE: Parking data requirements

Hi Venn,

I am unable to do Friday.

Can this be moved to a day next week possibly?

Many Thanks

Jennifer Bishop

Principal Permit Officer

Jenniferbishop@merton.gov.uk

From: Tom Davis

Sent: 27 January 2016 12:14

To: 'Chesterton, Venn'; Jennifer Bishop

Cc: Jason Andrews; Paul Walshe; Turpin, Kevin I

Page 41 of 59

Subject: RE: Parking data requirements

Hi Venn,

I'm free on Friday afternoon.

I have actually just commissioned a piece of work to identify the fuel type and emissions of every that we have issued a permit to, which should hopefully make things easier. I'm waiting for that data from our supplier but should hopefully have it by Friday.

Kind regards,

Tom Davis | Parking & CCTV Infrastructure Manager

Parking Services | Environment and Regeneration

London Borough of Merton

Merton Civic Centre, London Rd, Morden, Surrey SM4 5DX.

(020) 8545 3073 | 07580 813 888 | tom.davismerton.gov.uk

From: Chesterton, Venn [fmailto:Venn.Chesterton@ttr-ltd.com](mailto:Venn.Chesterton@ttr-ltd.com)

Sent: 26 January 2016 17:27

To: Jennifer Bishop; Tom Davis

Cc: Jason Andrews; Paul Walshe; Turpin, Kevin |

Subject: Parking data requirements

Dear Jennifer and Tom.

I hope you are well.

TTR have been commissioned by Jason Andrews (EH Pollution Manager) to investigate the introduction of an emissions based parking levy in Merton.

To do this we will need to understand the current parking enforcement method and have access to some of the information you hold on vehicles and permits.

Please can we arrange a teleconference in the next few days to discuss?

I am on leave for the next two days, but my colleague Kevin and I are free all day on Friday.

Best

Venn

Venn Chesterton

Divisional Manager— Energy & Environment

Transport & Travel Research Ltd

231 Vauxhall Bridge Road

London

SW1V 1AD

Phone: +44 (0) 20 7953 4069

Mobile: +44 (0) 7751 644597

Skype: venn.chesterton.ttr



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www.ttr-ltd.com

From: Paul Foster
Sent: 06 January 2016 17:02
To: Chris Lee
Cc: Jason Andrews; Chris Chowns; James McGinlay
Subject: RE: Proposed Diesel Levy

Hi Chris,

It's already underway, we've made contact with the consultants, Transport & Travel Research Ltd

Regards

Page 43 of 59

Paul

Paul Foster

Head of the Regulatory Services Partnership
London Boroughs of Merton and Richmond upon Thames
Civic Centre, London Road, Morden SM4 5DX
Tel. 020 8545 3077

From: Chris Lee

Sent: 06 January 2016 16:51

To: Chris Chowns; James McGinlay

Cc: Paul Foster

Subject: RE: Proposed Diesel Levy

Thanks , Paul we need to get cracking and commission / have the work completed this year Ta

Chris Lee I Director of Environment & Regeneration

London Borough of Merton

Merton Civic Centre, London Road, Morden, Surrey SM4 5DX

Direct: 020 8545 3050 I Switchboard: 020 8274 4901

chris.lee@merton.gov.uk

From: Chris Chowns

Sent: 06 January 2016 15:58

To: James McGinlay

Cc: Paul Foster; Chris Lee

Subject: RE: Proposed Diesel Levy

Hi James

TfL have just approved reallocation of 10k within 2015/16 budget for the scheme in principal. Just need to set scheme details on TfL's portal. Funding will need to be spent and invoiced before end March 2016.

Chris

From: James McGinlay

Sent: 05 January 2016 15:56

To: Chris Chowns

Subject: RE: Proposed Diesel Levy

Hi Chris.

Can you see if we can get funds to spend this year.

Ta.

James McGinlay

Head of Sustainable Communities
Environment and Regeneration
Merton Council

Tel: 020 8545 3889

From: Chris Chowns **Sent:** 05 January 2016 15:46 **To:** James McGinlay **Subject:** RE: Proposed Diesel Levy
James, Yes - There is 10K available in next year's LIP to explore the impacts of a diesel levy. I am sure we can reallocate some unspent funding from this year's LIP to bring the project forward (just needs an email to tf). I will also do a bit of digging in those boroughs where similar measures are being taken forward. The business case may not be huge as a lot of the diesel vehicles may be through traffic or parked in areas without a CPZ. So this is perhaps more about making a statement of direction.

From: James McGinlay

Sent: 05 January 2016 15:12

To: Chris Chowns

Subject: FW: Proposed Diesel Levy

Hi Chris.

Can you confirm?

Many thanks.

James

James McGinlay

Head of Sustainable Communities
Environment and Regeneration
Merton Council

Tel: 020 8545 3889

From: Chris Lee

Sent: 04 January 2016 17:55

To: James McGinlay

Cc: Paul Foster

Subject: FW: Proposed Diesel Levy

James , Jason believes there is 10k in next year's LIP for research on this matter . I asked we look to b/f to this year . Can we release some of the LIP this year to ge this research underway sooner ?

Thanks

Chris Lee I Director of Environment & Regeneration

London Borough of Merton

Merton Civic Centre, London Road, Morden, Surrey SM4 5DX

Direct: 020 8545 3050 I Switchboard: 020 8274 4901

chris.lee@merton.gov.uk

From: Paul Foster

Sent: 04 January 2016 16:53

To: Chris Lee

Subject: Proposed Diesel Levy

Page 46 of 59

Chris,

Pollution documents attached.

As soon as you get clearance to release the £10k, please let me and Jason know and we'll go ahead and commission the work.

Regards

Paul

Paul Foster

Head of the Regulatory Services Partnership

From: Paul Walshe
Sent: 23 December 2015 11:48
To: Jason Andrews
Cc: Paul Foster; John Hill
Subject: RE: Diesel Emission

Jason/Paul,

Spoke with Chris this morning he needs a briefing note regarding the above for the 7th January 2016 Scrutiny meeting about the benefits health etc. regarding a reduction in pollution from vehicles particularly Diesel emissions this document is going to be used as aide-memoire and will not be given to members. I will be there but he has also asked that one of you are in attendance.

Thanks.

Paul.

Paul Walshe

Head of Parking and CCTV Services

London Borough of Merton

020 8545 4189

Paul.Walshe@Merton.Gov.UK

From: Jason Andrews
Sent: 17 December 2015 09:52
To: Paul Walshe
Cc: Paul Foster
Subject: RE: Diesel Emission

Hi Paul

I agree, cart before the horse and all that, not really sure, my stance has been much the same, we do have the money from LIP to do the work but this isn't until 2016, so we could do this and pay ourselves back, and would this work necessarily change the budget forecast or just provide justification?

Kindest regards

Jason Andrews

EH Pollution Manager

Regulatory Services Partnership

London Boroughs of Merton and Richmond upon Thames

From: Paul Walshe

Sent: 17 December 2015 09:39

To: Jason Andrews

Cc: Paul Foster; John Hill

Subject: RE: Diesel Emission

Jason,

Thanks, however I will need to forward Chris your comments as I am not certain how that should be presented to scrutiny as the budget forecast was based upon simple sums in advanced of your work. My experience of scrutiny is that they may say your work should have been completed before any budgetary proposals were put forward.

Paul.

Paul Walshe

Head of Parking and CCTV Services

London Borough of Merton

020 8545 4189

Paul.Walshe@Merton.Gov.UK

From: Jason Andrews

Sent: 17 December 2015 09:32

To: Paul Walshe

Cc: Paul Foster

Subject: RE: Diesel Emission

Hi Paul

My comments are as before, that considering the sensitivity and that this relates to a 'diesel levy' (rather than 002) that we need to commission a paper to provide options and enable a measured justification. This is obviously a lot of work and somewhat outside our resourcing capability. The work can be done via consultancy and very quickly, the cost of this is around 10K.

Kindest regards

Jason Andrews

From: Paul Walshe
Sent: 17 December 2015 09:12
To: Paul Foster; Jason Andrews
Cc: John Hill
Subject: FW: Diesel Emission

Paul/Jason,

Please see below I would appreciate your comments this is as a result of DMT on the 16th December 2015 so I am afraid it is urgent.

Paul Walshe
Head of Parking and CCTV Services
London Borough of Merton
020 8545 4189
Paul.Walshe@Merton.Gov.UK

From: Paul Walshe
Sent: 17 December 2015 09:10
To: Jennifer Bishop; Jim Rogers; Adrian Rutkowski
Cc: Tom Davis
Subject: Diesel Emission

Dear All,

I was advised yesterday that I have to prepare a briefing report to go to scrutiny on the 7th January 2016, to date the only draft that exists is the document attached that Adrian put together and which I will need further data on.

Adrian

Can you update your report as I seem to remember that there maybe some new Councils who were going to introduce a surcharge on parking permits for Diesel vehicles and some were also going to increase their existing charge.

In the budget draft it refers to a possible saving of 250K for the 2017 2018 financial year but the numbers used were based upon Adrian's report which quoted that " According to the Society of Motor Manufacturers and Traders (SMMT) around 35% of all the vehicles in Britain are diesel powered, which gives a rough estimate of 4,900 diesel vehicles in Merton".

For the scrutiny committee meeting I need the following: A process including timescales of finding out the number of vehicles that have a resident or business permit that will be affected.

I am afraid this is now urgent.
Paul.

From: Paul Walshe
Sent: 17 December 2015 09:10
To: Jennifer Bishop; Jim Rogers; Adrian Rutkowski
Cc: Tom Davis
Subject: Diesel Emission

Dear All,

I was advised yesterday that I have to prepare a briefing report to go to scrutiny on the 7th January 2016, to date the only draft that exists is the document attached that Adrian put together and which I will need further data on.

Adrian

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For the scrutiny committee meeting I need the following:

A process including timescales of finding out the number of vehicles that have a resident or business permit that will be affected.

I am afraid this is now urgent.

Paul.

Paul Walshe

Head of Parking and CCTV Services

London Borough of Merton

020 8545 4189

Paul.Walshe@Merton.Gov.UK

From: Paul Walshe
Sent: 05 November 2015 11:32
To: Mitra Dubet; Eric Marchais
Subject: Diesel Emission Parking Permits

Mitra,

As discussed I have been asked to provide a paper to the December Cabinet on the above can you provide me with answers to the following questions which will form part of the report to Cabinet.

The proposal is to introduce a surcharge to the current range of parking permits so the current charge would remain, but an additional charge would be levied for Diesel vehicles, this will apply to all CPZ's and Car Parks.

It should be noted that the pollution team will need to buy in a resource to draft a report and some elements of that report may impact on the details in the consultation process

Questions

Does fundamental change need to be consulted upon if yes:

- Please estimate the length of time the process will take once resources are in place
- The number of resources needed to meet the above time frame
- The cost of resources needed

As I have to draft a report for the December Cabinet I would appreciate your response asap.

Thanks.

Paul.

Paul Walshe

Head of Parking and CCTV Services

London Borough of Merton

020 8545 4189

Paul.Walshe@Merton.Gov.UK

From: Councillor Judy Saunders
Sent: 15 October 2015 07:44
To: John Hill; Paul Walshe
Cc: Chris Lee
Subject: Diesel Emissions

Page 54 of 59

John / Paul

Further to our conversation yesterday regarding diesel emissions. I have spoken to Andrew and it is something he is aware of and I believe discussed with Chris. Andrew is the lead on air quality, however, I'd be grateful to be kept in the loop on this.

Kind regards,

Judy Saunders

Cabinet Member for Environmental Cleanliness & Parking

London Borough Merton

From: Jason Andrews
Sent: 08 May 2015 11:22
To: Adrian Rutkowski; Paul Walshe
Cc: Paul Foster
Subject: Diesel Levy on Parking Permits.
Attachments: UKSC_2012_0179 Judgment.pdf; national-measures for AQ.pdf

Hi Chaps

Further to our meeting this morning, I can confirm that I have requested information from my colleague at Islington around their work on an identical project, this may save re-inventing the wheel.

With regard to planning for any new air quality measures; I need to point out that following a supreme court ruling in April this year 'the Government' was ordered by a unanimous judgment, to prepare and consult on new air quality plans under article 23(1) for submission to the European Commission no later an 31 December 2015." (Judgement Attached)

In practical terms and as AQ practitioners we are waiting to see a draft consultation of the plan, this may provide a central steer to local authorities around the measures it may need to adopt.

These measures could mean a complete re-think or a centralised plan to tackle AQ and its monitoring. We have some ideas what this would involve, there are measures outlined in the document attached but I personally think we could see emission levies, and a push for Ultra Low Emissions zones (my opinion)

Before any real decisions are made, especially controversial ones, I think it may be prudent to wait. This said, I don't see that there is a problem preparing for a diesel levy, this may be part of the government's response, and therefore make our decision making process easier.

Kindest Regards

Jason Andrews

EH Pollution Manager

Regulatory Services Partnership

London Boroughs of Merton and Richmond upon Thames

Civic Centre, London Road, Morden SM4 5DX

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Appendix 8

Notes of Meetings

17 August 2016

Present: John Hill, Paul Foster, Jason Andrews, Paul Walshe

Matters discussed:

- Full consultation process (to be led by Future Merton) across each of the 40 Controlled Parking Zones
 - Report format for Scrutiny committee
 - Paul W to produce permit stats and also to speak to the Traffic & Highways team
 - LB Islington's diesel levy. Only recently introduced so no data available yet
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24 August 2016

(E&R DMT)

Present: Chris Lee, John Hill, Paul Foster, Jason Andrews

Matters discussed:

- Results of the scientific report conducted by Transport and Travel research Limited.
 - Vehicle emission schemes currently operational in other London Boroughs
 - Number of electric vehicle parking permits in Merton (currently 5)
 - Estimated total cost of parking permits compared to other London Boroughs
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Diesel Premium

I am unable to attend the Call-in on 14 December but I hope that members of the Overview and Scrutiny Commission can consider these comments:

In summary, a much lower surcharge would still grab attention; properly announced, a delayed introduction of the surcharge would still result in a marked shift from diesel. The surcharge schedule as proposed is disproportionate and unfair. It will be seen as a purely revenue-raising measure penalising captive residents. Cabinet should review their decision.

1. Amount and speed of introduction of the surcharge

As a member of the Sustainable Communities Scrutiny Panel I took part in the pre-decision scrutiny of an emissions levy on 7 September. The discussion revolved around a paper to cabinet suggesting a diesel surcharge of £50 to £100. The cabinet decision is for a surcharge, in just a few months' time, pitched almost at the top of this range and then increasing significantly.

Although cabinet was under no obligation to follow Panel advice, such a draconian introduction to the levy is not consistent with the Scrutiny Panel's discussion, pitched as it was around a potential £50 surcharge. Nor does it reflect the Panel's consensus over timing: *"members expressed their concern about residents not being given sufficient notice (of at least a year) so they have a chance to change their behaviour before the levy is imposed."* (Item 6 in the minutes.)

2. Changing behaviour and maintaining fairness

Cabinet has the opportunity to signal very clearly that an emissions surcharge will be introduced in the future. Vehicle owners can and will adapt. (This is precisely the approach announced on 2 December by the mayors of Paris, Mexico City, Madrid and Athens when they committed to excluding all diesel-powered cars and trucks by 2025.)

Instead, the effect of the Cabinet decision would be to punish owners of diesel vehicles. But in many cases their decision to purchase a diesel car was encouraged by government policy as the consultants' report to cabinet noted: *"The diesel fleet was generally newer, with the highest number of Euro 5 vehicles (from 2011) which reflects the recent shift to purchase diesels. The reasons for this may be due to the fact that diesel vehicles have lower CO2 emissions and have been incentivised by the government through schemes such as discounted car tax to reflect this."* (Report page 8.)

What impact might the announcement of a future surcharge have? Although the report conducted several hypothetical calculations, strangely it did not consider the likely impact that announcing a future surcharge might have on residents' car purchases. Presumably this was excluded from the consultants' remit but **such professional advice should have been obtained so that this key alternative could have been properly considered.**

Cllr John Sargeant

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The Alliance of British Drivers

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Attn Julia Regan
London Borough of Merton

Via email: Julia.Regan@merton.gov.uk

3 December 2016

Scrutiny of Decision to Implement Permit Parking Surcharge for Diesel Vehicles.

Dear Julia

Please accept this as our submission to the Scrutiny Meeting on the 14th December.

The Alliance of British Drivers (ABD) is a national body that promotes and represents the interests of motorists. I am responsible for the London Region of the ABD and for certain campaigns.

Before addressing the specific questions that councillors wish answered, let me give our general views on the question of air pollution in London.

We accept that there are serious problems with air pollution in London that affects the health of the population, and severely in some cases. But air pollution tends to be a problem concentrated in the central London boroughs and on specific locations only in the outer London boroughs (for example where there are large numbers of HGVs/LGVs and buses).

These problems have been made worse in recent years in relation to NOX because of the encouragement of diesel vehicles by taxation that involved a focus on CO2 emissions to the exclusion of other parameters. This has meant that vehicle owners have tended to purchase diesel vehicles for tax reasons and also because of the good fuel economy they provide. The negative aspects of diesel vehicles and their emissions have only become apparent in the last couple of years, wrong-footing both consumers and vehicle manufacturers (the latter have long lead times on model changes).

It would seem that Merton intends to penalise those residents who responded to past (and indeed current) Government incentives for a "greener" and more "sustainable" economy which is very unfortunate.

As regards the actual impact of air pollution in boroughs such as Merton, and in London as a whole, regrettably the position is often exaggerated. For example, the Agenda for the Meeting on the 7th November said "around 40,000 deaths are attributable to exposure to outdoor air pollution" (Page 1). That gave a lot of evidence on the damaging effects of air pollution but was more of a polemic as it simplified a lot of the evidence.

Kings College London who have produced some data on air pollution in London have also fallen into this trap. Their original estimates were based on the likely shortening of lifespan that results from air pollution (i.e. premature deaths). This was necessary because there are almost no cases where specific deaths are attributable to air pollution. So allegations of simple numbers of deaths are simply wrong.

The other problem with a lot of these allegations is that the estimates on which the "premature deaths" (or number of years of life lost) are based are exceedingly suspect and not based on good science. Even the producers of these estimates acknowledge that the "confidence" limits in statistical terms are wide.

It is worth bearing in mind that emissions from vehicles have been falling quite rapidly as the vehicle fleet is replaced with newer purchases and older vehicles scrapped. Indeed the historic data on the negative effects of air pollution may already be out of date. The Mayor of London has of course encouraged the purchase of newer vehicles with his proposals for the Ultra Low Emission Zone (ULEZ) and where there will also be a surcharge very soon for older, more polluting, vehicles.

We concede that it would be preferable from what is now known to encourage vehicle purchasers to upgrade to a modern vehicle which is either petrol or electric powered, or the latest standard for diesel (Euro 6). The Mayor of London is encouraging the Government to introduce a "scrappage" scheme for diesel vehicles which we support, although whether the Government will agree to this seems doubtful because of the cost.

The Mayor of London is introducing the Ultra Low Emission Zone (ULEZ) and this will actually extend to the whole of London within the M25 so will cover the borough of Merton. We do not understand why the Borough of Merton wishes to compound these efforts by introducing a scheme that will have little impact and will be exceedingly costly for a minority of residents (effectively those unlucky enough to have purchased a diesel vehicle and who rely on on-street parking).

Legal Issues Regarding Revenue Raising from Permit Parking Charges

We suspect the motivation for imposing charges on diesel vehicle owners is not simply health concerns but economic. With council budgets under such pressure of late, it might clearly be advantageous to raise the income from permit parking charges. But Councillors are reminded that on-street parking charges cannot be used as a "revenue raising" measure because the Act of Parliament that enables such charges to be imposed does not support that. Only administration costs can be recovered. This has been upheld in legal cases such as Camden v Cran and in more recent cases such as the attempt by Barnet Council to raise charges.

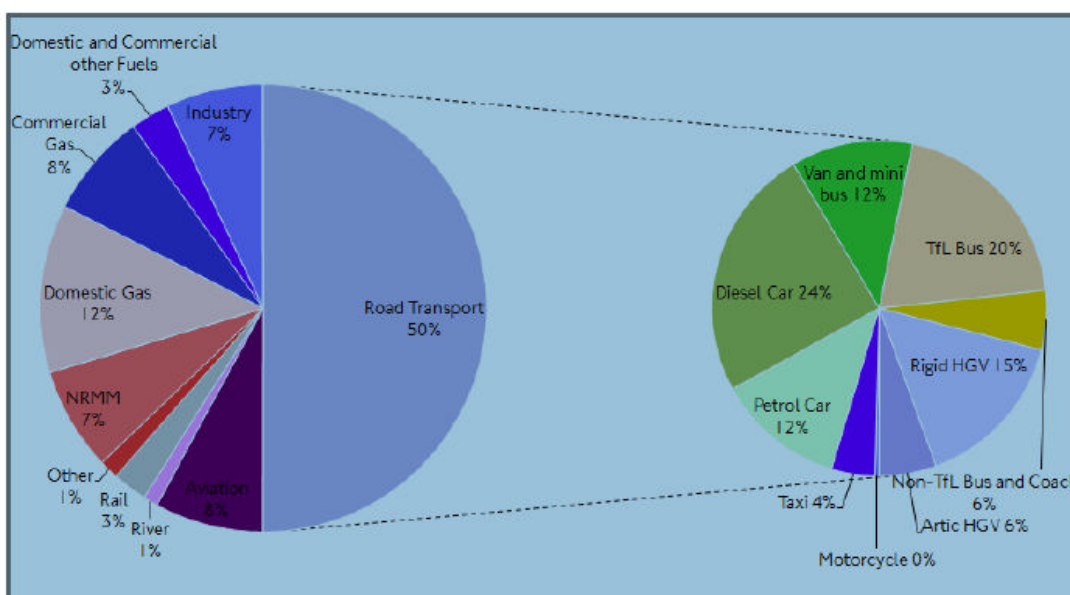
The Council's proposals for Merton will increase overall revenue from permit parking charges by as much as £861,150 dependent on the actual "surcharge" for diesel vehicles (see page 37 of the report). That might be offset to some extent by the discount for electric vehicles, but there are very few of those at present, and of course by possible reductions in future if people switch from diesel to electric or other vehicles. However that is not likely to take place rapidly as few people can afford to immediately replace their vehicles. In the meantime the council would be obtaining a large additional surplus from permit parking charges that would be illegal. This could only be rectified by introducing a discount for petrol fueled vehicles to offset the increased charges on diesel vehicles. The extended phase-in of the diesel charges may assist of course, but there is no estimation of the likely changes in overall revenue in the TTR report which is a major omission which should be rectified.

The Overall Impact of a Diesel Vehicle Surcharge on NOX in Merton

The TTR report also has another major omission in that there is no estimation of the likely impact of a diesel permit parking surcharge on NOX emissions across the borough. These factors need to be taken into account when considering the impact:

a - What proportion of vehicle emissions in the borough arise from private cars as opposed to the bigger polluters which tend to be HGVs, buses, taxis, LGVs etc, and other air pollution generators such as industry, offices, homes and other buildings? Indeed one factor to look at is what proportion of the air pollution actually blows in from surrounding boroughs or further afield. The TTR report says nothing on these matters. But there is data on the sources of air pollution in London in the recent Consultation Report on the ULEZ from TfL - see page 21 : https://consultations.tfl.gov.uk/environment/air-quality-consultation-phase-2/user_uploads/consultation-information-document.pdf-1 . Below is a chart from that document that shows that road transport only represents 50% of NOX emissions and diesel cars only 24% of that 50%, i.e. 12%.

Figure 3: NO_x sources in Greater London in 2013 (LAEI 2013)²⁰



As those figures cover the whole of Greater London, it is likely that they are representative of the data for Merton.

b - Another factor to consider is what proportion of cars on the roads of Merton which may be causing NOX pollution are actually owners of a parking permit from the Council. Clearly a number of the vehicles will have driven in from outside the borough, and in addition any vehicle owner who has off-street parking will not be affected by the proposed surcharge. What proportion of vehicles owned and parked in the borough actually have a parking permit? This should be a simple question for the Council to answer but is not in the TTR report so far as I can see.

When the similar borough of Richmond proposed to introduce a similar "emission-based permit charge", one Councillor suggested only one sixth of vehicles in the borough would be affected by it.

So if one assumes a similar figure for Merton, then the overall impact on emissions might be one sixth of 12%, i.e. 2%.

But that assumes that all NOX emissions from diesel vehicles will be removed which would only happen if all such owners converted to electric vehicles or stopped owning cars altogether. It is surely more likely that half might pay the increased permit charge, while another half move to petrol vehicles (which are not NOX free, but only reduce emissions by 63% over diesels according to the TTR report - page 19).

So taking those additional factors into account means that the overall reduction in NOX emissions might be 0.4% (40% of the 50% who respond, from the 2% above).

So this policy if implemented might result in a reduction of 0.4% in overall NOX emissions in the borough of Merton.

This is a ridiculously small figure which not only will be difficult to even measure (given the variation in NOX figures, the accuracy of equipment to use it, and the fact that more general trends might make it indiscernible), but can surely not be justified in terms of the cost and inconvenience imposed on local residents who have the misfortune to own diesel vehicles.

The Experience of Richmond

It is worth reminding Councillors of what happened in the London Borough of Richmond when they proposed to introduce an Emissions Based permit parking charge scheme. At the time they were a Liberal Democrat controlled council and had been for some years. They undertook widespread public consultation on the proposals and held public meetings on it, but despite widespread objections decided to proceed and implemented it. Subsequently this was surely one factor in the Liberal Democrats losing control of the council to the Conservatives with leader Serge Lourie also losing his seat in 2010. Their irrational anti-car policies were the source of many complaints. Subsequently the Conservative led council in Richmond scrapped the emission based permit scheme, although they have retained discounts for zero and very low emission vehicles. That would surely be a wiser policy for Merton to adopt.

Answers to Councillors Questions

Below are our specific answers to the questions posed by Councillors:

a - What experience does ABD have from elsewhere of schemes of this nature?

Answer: I have covered the experience in Richmond above - more information is present here: <http://www.freedomfordrivers.org/Richmond.htm> which was aimed to control CO2 emissions but would not have succeeded. We do not have experience of the few London boroughs who have attacked diesel cars and are certainly not aware of any evidence that they have reduced NOX emissions.

b - What the impact has been for the residents in question elsewhere in the country?

Answer: None so far as we are aware.

c - What does ABD believe would be a fair level of levy for diesel vehicle owners living in CPZs?

Answer: We do not believe that any "surcharge" for diesel vehicles would be fair, bearing in mind that the ULEZ scheme is likely to be implemented and will provide incentives to change vehicles.

d - What does ABD believe should be the timeframe of implementation for a levy of this kind?

Answer: Never.

e - What does ABD think would be a fairer approach for diesel vehicle owners living in CPZs?

Answer: There should be no prejudice against diesel vehicle owners who require on-street parking. These are matters for the national Government to cover and we should not encourage such local schemes that are the result of "gesture politics" which will have negligible impact on emissions.

f - What alternative suggestions ABD would make to improve air quality in the borough and reduce diesel emissions?

Answer: Encourage the national Government to discourage diesel vehicles by taxation adjustments, and tackle the many other sources of air pollution other than private car owners who happen to have a parking permit.

g - How should any revenue from this surcharge be spent to improve air quality?

Answer: Apart from the fact that raising extra revenue from such a policy would be illegal, we have no particular suggestions to make in this regard.

h - Does ABD believe this policy is a sufficient incentive to encourage greater take up of electric vehicles in the borough?

Answer: No at this present time. The lack of attractiveness of electric vehicles depends on their relative inflexibility and the fact that they currently cost significantly more than the equivalent petrol or diesel power vehicle. Even hybrids are somewhat more expensive. These costs may improve over time as more electric vehicles are owned. However, total environmental costs of electric vehicles are no better than petrol vehicles because of the high production costs (resources used) and the fact that electricity generation is not emissions free - however it does tend to move the environmental impact elsewhere (a kind of "beggar thy neighbour" approach) while reducing emissions in cities.

Conclusion

Our response on this matter has unfortunately had to be relatively brief due to pressure of time on a topic that is complex and difficult for those unfamiliar with this policy area to understand. But in essence we do not see any significant benefit in resulting NOX emissions by introducing a diesel surcharge on permit parking fees in Merton. Even introducing such a change will of course incur administration costs which will be a wasted and unproductive cost.

Councillors should at least request that more work be done on the TTR report to give more specific evidence on the likely benefit (if any) of such a scheme, as explained above, before any such proposal is taken forward.

Yours sincerely

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