

# Cabinet Member Report

**Date:** 22 February 2017

**Agenda item:** N/A

**Wards:** Borough wide

**Subject:** Emissions Levy – statutory consultation

**Lead officer:** Chris Lee, Director of Environment & Regeneration

**Lead member:** Councillor Martin Whelton, Cabinet Member for Regeneration, Environment and Housing

**Forward Plan reference number:** N/A

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## Recommendations:

That the Cabinet Member considers the issues detailed in this report and

- A. Notes the results of the statutory consultation carried out between 12th January 2017 and 3rd February 2017 on the proposals to:
  - Apply £150 diesel levy to all diesel vehicles that have a Resident, Business or Trade parking permit in addition to the price of the permits itself. The levy will be phased over a 3 year period - £90 in 2017/18, £115 in 2018/19 and £150 in 2019/20.
  - Reduce price of resident permit to £25 for those residents who have an electric vehicle.
- B. Notes and considers the representations received along with officer's comments in respect of the proposals as detailed in Appendix A.
- C. Agrees to proceed with the making of the relevant Traffic Management Orders (TMO) and the implementation of the following proposal set out in section A above.
- E. Agrees to undertake a statutory consultation to apply the diesel levy to Teacher's permit and to apply a reduction of £40 to business and trade permits with electric vehicles.
- D. Agrees to exercise his discretion not to hold a public inquiry on the consultation.

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## 1 PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 This report details the results of the statutory consultation carried out between 12th January 2017 and 3rd February 2017 on the Councils' proposals to introduce:
  - A £150 diesel levy (in addition to the cost of the permit) to all diesel vehicles that have a Resident, Business or Trade parking permit. This will be phased over a 3 year period - £90 in 2017/18, £115 in 2018/19 and £150 in 2019/20.
  - Reduce the price of resident permits for electric vehicles to £25.

- 1.2 It seeks approval to proceed with the making of the relevant Traffic Management Orders (TMO) for the proposed measures.
- 1.3 This report seek Cabinet Member approval to undertake a statutory consultation to add the levy to the Teacher's permit and to apply a reduction of £40 to businesses and trade permits with electric vehicles.

## **2 DETAILS**

- 2.1. On 14<sup>th</sup> November 2016, at Cabinet meeting the following were agreed:
  1. the introduction of a levy charge for all diesel vehicles that have a Resident, Business or Trade parking permit with the introduction of £150 levy phased over a 3 year period - £90 in 2017/18, £115 in 2018/19 and £150 in 2019/20.
  2. Parking permit charge for electric vehicles (resident permit) to be set at a discounted rate of £25 per annum.
  3. The Council to review the impact of the diesel levy for a period of 2 years, with a view to the introduction of comprehensive emissions based parking scheme.
- 2.2 Following the decision's publication, the decision was subject to a Call-in. On the 14<sup>th</sup> December 2016, the decision was scrutinised by the Council's Overview and Scrutiny Commission. The Cabinet's previous decision remained unchanged.

## **3 CONSULTATION**

- 3.1. To implement the above, it was necessary to undertake a statutory consultation to amend all the Traffic Management Orders pertaining to Controlled Parking Zones.
- 3.2. This statutory consultation started on 12th January 2017 concluded on 3rd February 2017. All representations received after this date, have been included within this report. The consultation was carried out by-
  - Advertising in the newspapers
  - Informing all known resident & business associations
  - Depositing documents at The Link at the Civic Centre
  - Placing Notices and leaflets in local libraries & leisure centres, and on Park's Notice Boards.
  - Using Social media (including local radio station Radio Jackie)
  - Publishing full consultation information on the Council's website.
  - At some area based workshops
- 3.3. Due to the extent of the consultation area (across all roads subject to a CPZ) the Council did not erect yellow notices or send individual residents / businesses any newsletters.
- 3.4. Although the closing date was 3 February 2017, all late representations were accepted up to completing this report. 150 representations have been received, 9 of which are in support but have raised some concerns.
- 3.5. In addition to individual representations, an on-line petition consisting of 165 signatures has also been received. This is attached as appendix B.

- 3.6. All representations including the petition along with officer's comments are detailed in Appendices A and B.
- 3.7 Based on the feedback received, it is acknowledged that there is a need to tackle poor air quality however the argument lies with the method of implementation. It is important to note that this is one of many measures being taken across the country, regionally and within London. As a Local Authority LB Merton has very few ways to directly influence driver behaviour and it is understood that for some this will seem unfair. However, there is a need for the Council to make a direct and bold commitment to protect the health and wellbeing of borough residents, visitors and those vulnerable groups.
- 3.8 The Council is aware that the levy will not completely resolve the problem of poor air quality in the borough but it will contribute to a move toward air free of toxic pollution.
- 3.9 Many of those who have submitted representations are aware of the seriousness of the health issues surrounding air quality. They agree that action must be taken and understand that the Council has responsibility for both protecting and improving the health of its residents. However the common themes for objections include:-
- Permit holders having to pay an additional charge for a diesel vehicle that they purchased in good faith at the recommendation of Central Government.
  - They consider that the Council should work with Central Government on air quality measures and not in isolation
  - They question the equality of only charging residents within CPZs
  - They highlight the need to address issues of 'through traffic' which consists, in their opinion, of the more polluting vehicles i.e. buses, taxis, commercial vehicles
  - Lack of forewarning

#### **4. RECOMMENDATION**

- 4.1 It is recommended that the Cabinet Member notes all the representations including the petition along with officer's comments as set out in Appendices A and B within this report and agree to the making of the relevant Traffic Management Orders (TMO) for the following:
- A £150 diesel levy (in addition to the cost of the permit) to all diesel vehicles that have a Resident, Business or Trade parking permit. This will be phased over a 3 year period - £90 in 2017/18, £115 in 2018/19 and £150 in 2019/20.
  - Reduce the price of resident permits only for electric vehicles to £25.
- 4.2 In response to the feedback received, it is recommended that a statutory consultation is carried out for the introduction of £40 reduction to business and trade permits with electric vehicles. This is in line with the reduction that is applied to resident permits for electric vehicles.
- 4.3 It is also recommended that a statutory consultation is carried out to apply the diesel levy to Teacher's permit.
- 4.4 As well as residents parking levys the Council will continually review how it can influence all vehicles in the borough e.g. changes to Merton's own fleets, through non-residential parking, Clear Air Zones or lobbying GLA / TfL for cleaner public transport.

## **5. TIMETABLE**

- 5.1 The TMOs will be made and the levy will be introduced as soon the decision is made by the Cabinet Member and after the Call-In process.
- 5.2 The statutory consultation regarding the Teachers, Trade and business permits will be carried out after April 2017.

## **6. FINANCIAL, RESOURCE AND PROPERTY IMPLICATIONS**

- 6.1 Given that the levy will be introduced incrementally over a three year period and based on the current data held on the number of diesel vehicles within Merton's CPZ, it is estimated that the additional levy charge will generate up to approximately £517K during 2017/18; £660K during 2018/19 and £861K during 2019/20. It is important to note that these figures are based on current numbers of diesel vehicles and it is assumed that the numbers of diesel vehicles are likely to reduce both before and after the initial year of implementation which feeds into the Council's objective to discourage diesel vehicles and therefore better air quality.
- 6.2 By law, any revenue generated from parking must be spent on transport related schemes. These include but are not limited to, traffic management and control schemes, road and infrastructure schemes and Concessionary Fares. Additionally, the council is currently drafting a new air quality action plan which will contain the measures a local authority can take to address poor air quality, this includes better monitoring arrangements, borough fleet actions, localised solutions, delivery servicing and freight, emissions controls through the planning agenda, cleaner transport and awareness campaigns.
- 6.3 All of these measures will be supported by the diesel levy.

## **7. LEGAL AND STATUTORY IMPLICATIONS**

- 7.1 The Traffic Management Orders would be made under Section 6 and Section 45 of the Road Traffic Regulation Act 1984 (as amended). The Council is required by the Local Authorities Traffic Order (Procedure) (England and Wales) Regulations 1996 to give notice of its intention to make a Traffic Order (by publishing a draft traffic order). These regulations also require the Council to consider any representations received as a result of publishing the draft order.
- 7.2 The Council has discretion as to whether or not to hold a public inquiry before deciding whether or not to make a traffic management order or to modify the published draft order. A public inquiry should be held where it would provide further information, which would assist the Council in reaching a decision.
- 7.3 The Council's powers to make Traffic Management Orders arise mainly under sections 6, 45, 46, 122 and 124 and schedules 1 and 9 of the RTRA 1984.

## **8. HUMAN RIGHTS, EQUALITIES & COMMUNITY COHESION IMPLICATIONS**

- 8.1 Bodies representing motorists, including commuters are included in the statutory consultation required for draft traffic management and similar orders published in the local paper and London Gazette.
- 8.2 Improved air quality will benefit the environment and all those within Merton.

## **9. CRIME AND DISORDER IMPLICATIONS**

- 9.1 N/A

## **10. RISK MANAGEMENT AND HEALTH AND SAFETY IMPLICATIONS**

- 10.1 All current data and research around vehicle emissions shows that diesel cars are disproportionately responsible for poor air quality. There is also a clear link made by health professionals between air quality and mortality.
- 10.2 The council has declared the whole borough as an air quality management area, and as such has a legal duty to take action to tackle poor air quality. The Council is reviewing all of the measures that it can take as a local authority to address this problem. One of these measures is to incentivise those with parking permits away from the more polluting vehicles, in the same way as other authorities have.
- 10.3 The Council must take responsibility for the health of its residents including vulnerable groups such as those with existing breathing difficulties, the young and the elderly. It is acknowledged that there are some residents who feel that the levy is unfair but the current research shows that there are thousands of deaths a year in London caused by poor air quality, and therefore the Council must take all possible action to address air quality. The introduction of the levy is one of many.
- 10.4 As well as residents parking levys the Council will continually review how it can influence all vehicles in the borough e.g. through non-residential parking, Clear Air Zones or lobbying GLA / TfL for cleaner public transport.
- 10.5 The risk in not addressing the issue would be irresponsible and could be considered as a failure by the Council to discharge its statutory obligations.

### **APPENDICES –**

Appendix A – Representations plus officer's comments

Appendix B - Petition

### **BACKGROUND PAPERS**

Leader's Strategy Group – report dated 7 November 2016

Consultant's reports prepared by Transport & Travel research Ltd

## APPENDIX A – STATUTORY CONSULTATION REPRESENTATIONS AND OFFICER RESPONSES

Ref	Representation	Officer Response – refer to each point within overarching response
1	<p>As a resident, parent, driver and a cyclist I support all measures to improve air quality. A diesel levy seems reasonable, but I suspect that a significant proportion of the pollution emitted in Merton is by vehicles that are parked outside controlled parking zones. Cycling down Alexandra road on a regular basis I pass many heavy goods vehicles, particularly run by Cappagh, trade vehicles and buses - would these be impacted by a diesel levy? How many commercial vehicles would be impacted by this policy? They are likely to be driven more and therefore have a greater impact on pollution. An argument could be made that the business diesel levy should be higher than the residential levy. I therefore wonder if there is any data to support the introduction of a diesel parking levy to reduce pollution in Merton or other London boroughs? Is there a plan to monitor levels to measure the effect of this policy?</p>	<p>The proposal is that the levy would be the same for affected all groups (Resident, Business and Trade). Currently the business permit charge is £802 per year and is subject to the levy will rise by £90, £115 and £155 additional cost which is considerably higher than the 1<sup>st</sup> residents parking permit charge of £65 per year.</p> <p>Additionally refer to points 1, 4, 7 of officer's comments</p>
2	<p>I am writing to you to voice my objections to the ill thought out stealth tax otherwise known as the diesel levy. Such levy will have no effect on the borough's quality based on the councils ill-conceived statement of reason. Residents will not be encouraged to change their vehicles from diesel to non-diesel vehicles based on the levying of further taxes on residents. Diesel vehicles are often chosen by families as they are cheaper to run than equivalent petrol vehicles and cheaper to purchase and maintain than many hybrid vehicles. How has the council come to this conclusion that it is its own residents polluting the air? What is the extra funding going to be spent on and how will this clean the air? By the council's own statement of reason, this isn't a means to raise funding to combat pollution but is an attempt to deter diesel cars in the borough. Without proper planning, investigation, monitoring and plans for funding, this is a short sighted financial attack by a council that cannot balance its own books on the residents it is supposed to serve.</p>	<p>The Council disagrees that this will not have an effect on the borough's air quality. This is one of a number of measures all of which will impact upon pollution in the Borough.</p> <p>There is no evidence to suggest this policy will impact upon poor families disproportionately.</p> <p>Additionally refer to points 2, 3, 4, 13 of officer's comments</p>
3	<p>I am writing to you on behalf of the Apostles Residents Association which represents 1000 households in the Raynes Park area. We are disappointed to learn about the Council's plans to introduce a levy on diesel cars as a stepped levy to resident parking permits. We appreciate that air pollution is a major issue and it needs to be addressed. However, we believe that this is an unfair and unjust way of tackling this problem for the following reasons:</p> <p>1. All diesel cars add to air pollution, therefore it's unfair to charge only those that have to purchase resident parking permits to park their diesel car and exclude those that are lucky enough to be able to park their cars outside of a CPZ area or on a private driveway. The Apostles area is a series of 12 roads populated with houses that were mainly built in the late 1800s and therefore the only parking available is on the street. This will have a huge impact</p>	<p>Refer to points 1,3, 5, 13 of officer's comments</p>

	<p>on people in the local area.</p> <p>2. During the CPZ consultation in our area, the likelihood of increases to the cost of parking permits of these kinds was not mentioned and therefore it appears that the Council is using this as a money making scheme.</p> <p>3. How can you prove that the money raised from this scheme will go to improving air quality? If not, it really is just a means of making more money?</p>	
4	<p>I understand a levy has been proposed on diesel cars within controlled parking zones in Merton. This is inherently wrong. I agree that the Council and Government need to do more to sustain our environment but this is a very arbitrary measure picking on those who already own diesel cars and may have done for a long period and purely because they live in a controlled parking zone.</p> <p>CPZ are about residents being able to park near their own properties, particularly important for the elderly and young families. This has become an increasing issue due to people trying to avoid parking fees in the few available car parks in the town centres. Parking on my street became a nightmare and I campaigned with my neighbours to get a CPZ. Neighbours were concerned over the permit costs but we were assured by the council permit costs were only ever to cover the cost of running the scheme and to benefit residents by keeping parking available for them. Suddenly the council is backtracking on this assurance and using parking permits as a means to punish residents for the car they bought in the past - especially when people were encouraged to buy diesel as being a cleaner option than petrol.</p> <p>How is it fair to punish drivers based on where they park, those not in a CPZ will have no penalty?</p> <p>These are surely measures that need to be tackled at national level at all drivers and not targeted at those who park responsibly.</p> <p>This is going to cause major problems for streets on the edge of CPZ's where people try to avoid needing a permit and park elsewhere. Please reconsider as this is very unfair</p>	Refer to points 1, 2, 4, 5 of officer's comments
5	<p>It is quite by chance that I was alerted to the council's intention to introduce a diesel levy on cars that have a parking permit. I object to this on the following grounds:</p> <ol style="list-style-type: none"> <li>1. There has been no communication of this levy to residents that have parking permits and will be affected. As a minimum, a letter of intent should have been sent out to all parking permit holders advising of this levy and giving everyone an equal chance to make representations.</li> <li>2. There is nothing on the Council's website that when applying for a parking permit this levy will come into effect.</li> <li>3. This is discriminatory against households that have a parking permit and do not have the luxury of off-street parking.</li> <li>4. Many of us bought diesel cars on the advice of the Brown Government that they were better for the environment. We are now being penalised for a Government initiative.</li> <li>5. The biggest polluters are lorries, vans, buses and coaches but no attempt is being made to make these owners pay for their impact on the environment, instead the Council is going for the easy win against local residents.</li> <li>6. When I provided information on my car to apply for a residents parking permit I did not give the Council</li> </ol>	<p>Given the size and extent of the consultation area, it would have been unfeasible to do a newsletter drop to all properties within all CPZ zones. The statutory consultation was communicated from January 2017 by using the following methods :</p> <ul style="list-style-type: none"> <li>• On the council's website</li> <li>• Advertised in the Local Guardian and the London Gazette newspapers</li> <li>• Via leaflets and posters at libraries, leisure centres and at Merton Link</li> <li>• Via all ward councillors</li> <li>• Via all known resident and business</li> </ul>

	<p>permission to use that information to another end other than issuing a parking permit. Using my car information to determine if it is a diesel car is an abuse of information held by the Council.</p> <p>7. There is no transparent process of how the funds from the levy will be used to reduce air pollution, as is the council's claim. It is impossible that the funds raised will or can be used to implement an effective method of reducing air pollution. Instead I suspect the funds will merely be added to the Council's coffers, having been raised under the misrepresentation of improving local air quality by making the polluters pay. Most car owners cannot afford to change their car and move to a less polluting option.</p> <p>Whilst recognising the need for air quality to be improved, this proposed levy is divisive against a certain group of local residents who may not be the sole contributors to the problem but are being made to be the sole payers. I trust the Council will rethink this proposed Diesel Levy for a more equitable solution.</p>	<p>associations</p> <ul style="list-style-type: none"> <li>• Via local radio station</li> <li>• Via social media including several press release</li> </ul> <p>The information provided by residents has not been disclosed to any other team or organisation. The information provided by residents to Parking services for the purpose of a permit is being used for the purpose of the permit.</p> <p>This is one of a number of measures all of which will impact upon pollution in the Borough.</p> <p>Also refer to points 2, 5, 10,13 of officer's comments</p>
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 108</p>	<p><u>1st Representation</u></p> <p>I should like to register my disagreement of a blanket application of a levy to all diesels for the following reasons:</p> <ol style="list-style-type: none"> <li>1. I agree that cleaner air is desirable in London. It is why we chose a car which more than fulfils the latest Euro 6 emission requirements. Our diesel car is cleaner than most petrol cars, therefore should not incur an additional charge. The Council's Statement of Reason is incomplete in this respect, therefore, incorrect.</li> <li>2. It would be fairer for households with multiple cars to bear a levy as they are more likely to be able to afford the charge.</li> <li>3. The Council should improve its' traffic management. There are queues of standing traffic at off peak times with poor co-ordination.</li> <li>4. Sorting out potholes would benefit cyclists and drivers, not just one group.</li> <li>5. Manage the roadworks. Both utilities and the Borough's works are poorly supervised for efficient completion. This has promoted standing traffic at bottleneck work sites.</li> <li>6. Merton has not produced evidence of a demand for particular Projects that would effectively make our air cleaner.</li> </ol> <p>There is a requirement for this to be tackled by London as a whole, not piecemeal. I will be more than unhappy at being asked to pay a levy when I'm breathing in other borough's fumes. Widen your horizons.</p> <p><u>2nd Representation</u></p>	<p>The council is continually addressing its traffic problems as part of its day to day duty. However it is important not to disconnect the driver's responsibility, the car they use and their personal contribution to poor air quality. This is something all road users are complicit in and this charge is a move towards connecting the driver to their own responsibility for pollution</p> <p>Also refer to points 1, 3, 8,10, 12 of officer's comments</p>



<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 109</p>	<p>I took time to read the recommendations included with, 'The Leader's Strategy Group of 7 November 2016'. It would have been informative if your delegated responder, Councillor Garrod accorded the same consideration to my email and addressed my raised issues. Cleaner air is a good goal.</p> <p>The Strategy Group does not report any consideration of or comment on the Euro Standards for emissions which are applicable to both petrol and diesel vehicles. Euro 6 introduced in September 2015 requires standards as follows. Courtesy of the AA:</p> <p>Euro 6 emission limits (petrol)</p> <ul style="list-style-type: none"> <li>• CO – 1.0 g/km</li> <li>• HC – 0.10 g/km</li> <li>• NOx – 0.06 g/km</li> <li>• PM – 0.005 g/km (direct injection only)</li> <li>• PM – 6.0x10<sup>-11</sup>/km (direct injection only)</li> </ul> <p>Euro 6 emission limits (diesel)</p> <ul style="list-style-type: none"> <li>• CO – 0.50 g/km</li> <li>• HC+ NOx – 0.17 g/km NOx – 0.08 g/km</li> <li>• PM – 0.005 g/km</li> <li>• PM – 6.0x10<sup>-11</sup>/km</li> </ul> <p>Euro 6 diesel and petrol standards for emissions are on a parity. Indeed, under the introduction of the Mayor's forthcoming Ultra Low Emission Zone, my Euro 6 diesel is compliant and will be exempt from charges. Therefore, it is discriminatory to impose a charge on diesel vehicles meeting these standards. Older vehicles which do not have the same credentials should be encouraged to be replaced within a reasonable timescale.</p> <p>The Council's mantra is that the 'Polluter Pays'. Please start by leading the way with demonstrating the Council's commitment to establishing reasoned acceptable standards. Publicly show what the Council is doing to improve air quality in its everyday operations as there is many areas which could be revisited and addressed. Lobby the Mayor to keep his promise of capping London travel charges for the next 4 years. Why is there no informed option C in your Strategy Group document which reflects informed reason?</p>	
<p>7</p>	<p>Whilst I support proposals to improve air quality in London, this is another method of getting the Tax-player to foot the bill for the Governments mistakes, which I strongly do not support. After all, it was the government who encouraged citizens to buy low emitting CO2 diesel vehicles previously, which is why there are so many on the roads. Furthermore, I believe the current range of alternative-fuel vehicles for family sized and commercial grade vehicles are very limited and very expensive; also current petrol alternatives are too expensive to run (mpg-wise). It is therefore not realistic / viable for working class families to switch to such new environmentally friendly vehicles without some financial assistance from the Government/Council.</p>	<p>Refer to points 1, 2, 3 of officer's comments</p> <p>There are discussions underway to</p>

	<p>In addition, the Government has allowed public transport fares to rise astronomically, make this mode of transport also not viable for the average London family. Cars are the only realistic choice.</p> <p>As a civilized nation in the twenty first century, I propose that if this Diesel Levy is introduced, then the government should be providing financial incentives to make alternative fuel vehicles financially viable for the average city dweller, not the privileged few.</p> <p>In conclusion, I think this Diesel Levy has been introduced too soon, without viable vehicle alternatives available on the market. Second hand hybrid and electric vehicles have not yet come down in price to make switching affordable for most families. Please consider delaying this initiative or at the very least, significantly reduce the proposed levy charges.</p>	<p>consider a diesel scrappage scheme</p>
<p>8</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 110</p>	<p>As a resident in Wimbledon Chase, I am alarmed to learn of a proposal from Merton Council for a levy on “all diesel vehicles” with Resident, Business or Trade parking permits within the borough. This levy starting as £90 in 2017/18, before increasing to £115 in 2018/19 and £150 in 2019/20.</p> <p>My car, a diesel BMW, has a Resident Permit for which I currently pay Merton Council £90. The annual road tax I pay to the DVLA for this vehicle is £20 per annum. As a result - subject to appropriate insurance - I am permitted to drive as much as I need to for work or pleasure across the entire United Kingdom for a period of 12 months.</p> <p>I have every confidence in saying that £20 figure has been arrived at by the DVLA at least in part to reflect my vehicle’s excellent emissions results. This in turn would incentivise and reward people whom acquire similar vehicles which achieve equivalent emissions results and efficiencies. As I write this I have seen nothing from the Government or DVLA to suggest this policy is changing.</p> <p>I am aware of and have read reports on the health effects of emissions from diesel vehicles. However, it should be plainly obvious to anyone with an understanding of the subject that all diesel vehicles are not all equal in terms of their emissions. The DVLA are aware of the differences and charge accordingly. Transport for London are aware of the differences and currently charge vehicles entering the LEZ (Low Emissions Zone) which exceed its requirements - I live within the LEZ and am not subject to a charge.</p> <p>You may be interested to learn that my current vehicle would actually be able to enter the planned ULEZ (Ultra Low Emissions Zone, coming into force in 2020) without charge. This is because my diesel vehicle meets the more stringent Euro Standard 6 for emissions. Euro Standard 6 which, for your information, includes restrictions on nitrogen oxide (NOx), carbon monoxide (CO), hydrocarbons (THC and NMHC) and particulate matter (PM).</p> <p>And yet it is Merton Council’s proposal to persecute the resident owners of “all diesel vehicles” equally? The DVLA and TFL are evidently aware of the critical differences in the emissions within diesel vehicle classes and I am sure that they would be able to provide Merton Council with the necessary information enabling you to target the worst offending vehicles, assuming of course that these same vehicles are not already being identified and charged by existing TFL emission zone measures. For the avoidance of doubt, I do not support this levy as proposed. And as a resident I would like written confirmation of what Merton Council knows that the Government,</p>	<p>Refer to points 2, 3 &amp; 5 of officer’s comments</p>

	<p>the DVLA and TFL do not know that could remotely justify such a clumsy, disproportionate local levy. Please note I have also included the dedicated Low Emissions Team of TFL within the circulation of this message as I am sure they too would be disposed to expand their knowledge in this area.</p>	
9	<p>I would urge you not to go ahead with this proposed plan. It seems to me that you are creating a double taxation scheme. The road tax already quite rightly taxes people based on the CO2 emissions of their car. It does not make sense for you to also do the same. Your tax should be based on the space that people are taking up on the kerbside and not on the emissions their vehicle produce. Therefore the tax on parking permits should be the same for all cars, or based on the space they take up.</p> <p>I would also like to see the council promote the use of electric vehicles by providing more charging points. I am pleased to see a few that have been installed in the village, but I would like to see you go further. I would also like to see you encourage a hydrogen fuelling station in Merton. These would be positive steps forward to help people adopt a lower CO2 approach to transport. Penalizing people retrospectively for car purchases they made a number of years ago, i.e. the decision to purchase a diesel car seems unhelpful.</p>	<p>Refer to points 1, 5 &amp; 12 of officer's comments</p> <p>The Council is currently introducing electric charging points across the borough. Thus far 20 charge points have been introduced and another 30 is planned for 2017/18.</p>
10	<p>My comments with regard to the proposal to introduce the levy are as follows. While I appreciate the reasons for implementing a levy and not personally having a diesel vehicle I believe the introduction so quickly for residents is unfair. Many people who use cars for work are already taxed for this privilege and many use diesel for historic reasons and should be given time to consider their position. The cost of changing a car and losing money on any sale should not be ignored. With regard to commercial vehicles surely purchasing petrol vehicles is quite often not an option. Therefore all that will happen is any cost will be passed on to the consumer. Any decision as this should be part of a wider consultation/discussion with central government and the vehicle manufacturing industry and other interested parties so that we have a joined up decision making process. I am all for protecting our health which is what a previous Government thought they were doing when they exhorted people to purchase diesel. As a tax payer and rate payer I wonder why the Local Authority and Central Government have been so slow in tackling this issue.</p>	<p>Refer to point 1 of officer's comments</p> <p>Discussions are currently ongoing with the GLA and DEFRA in respect of commercial vehicle purchase.</p> <p>As part of the statutory consultation, freight and motoring bodies are consulted</p>
11	<p>I am against penalising the owners of diesel vehicles because it is based on a false balance of risk. There is a suggestion that vehicle pollution in the worst area causes a reduction of life expectancy of 6 months. Removing all diesel vehicles would reduce this possibly by 3 or 4 months. However, diesel vehicles are vastly more efficient than petrol, hybrid, LPG or electric if measured from original fuel source.</p> <p>It is certain that if we had not had diesel engines over the last century we would have already have passed the tipping point of global warming. We would not be having this discussion because London would be under the sea.</p> <p>So if you persist in imposing this penalty you are either ignoring the science or just cynically sneaking in another tax.</p>	<p>Refer to points 1, 2, 3 of officer's comments</p>
12	<p>We wish to be part of the consultation for charging some people who own diesel cars an annual tax on the use or even non use of their vehicle for however long or short a period, regardless of size.</p>	<p>Refer to points 1, 2, 5, 10 of officer's</p>

	<p>The shock of receiving this news, indirectly through our neighbours, is not to be underestimated and I am sure will be covered in future car magazines. The desire to remove particulates from our atmosphere is to be supported but the taxing of the few is inappropriate and dictatorial in nature. We make the following points:</p> <ol style="list-style-type: none"> <li>1. This impacts not only on the family budget annually but also the value of the car which was acquired before the current problems of diesel were recognised. It is right to consider reducing new diesel vehicles but why penalise so many who bought their cars in all innocence and with government encouragement.</li> <li>2. It takes no consideration of use and commercial vehicles pose a much greater risk than domestic cars</li> <li>3. When parked on or off the street there is no impact on the environment so as well as use not being considered neither is vehicle size or efficiency. And this is entirely targeted at those with permits. Surely any tax should be aimed at the widest possible population.</li> <li>4. This tax is aimed at diesel users and therefore is very selective and a poor reaction to the problem of health and environmental damage. It is a problem which can be better prevented by controlling future use, driving technique and the use of public transport (on non diesel vehicles where possible) as an alternative. I do not support this action.</li> </ol>	<p>comments</p>
<p>13 Page 112</p>	<p>Regarding the proposal to implement a levy on all diesel cars via the CPZ procedure I have some questions.</p> <ol style="list-style-type: none"> <li>1. You cite (rightly) that air pollution is a major health issue in the UK and London particularly, why is this health issue one you have chosen to prioritise with this initiative vs obesity, dementia, smoking etc?</li> <li>2. Does this initiative have the Mayor of London's support?</li> <li>3. Given that the National Government has until recently been advocating diesel cars as a more efficient alternative to petrol, is it right to penalise Merton's residents who have responded to such advice and incentives for doing so?</li> <li>4. Surely owning a diesel car is only one aspect - parking a diesel car, in and of itself is not a problem to air pollution - in fact if I were to live in a CPZ I would not have a permit for my car because I am driving it daily. Your levy would be another £150/yr to persuade me not to take public transport to work. Do you accept that this could act as a perverse incentive for people to actually drive their cars more? What analysis has the council conducted to estimated the impact on behaviour including unintended consequences?</li> <li>5. What are the council's plans to incentivise people to walk, use public transport or car share to reduce the total number of miles/hours driven in Merton? Parents who drop their children off to school account for a lot of congestion in built up areas, this slows down traffic and increases air pollution - would targeting pinch points like this not be more effective in deterring air polluting and in providing people a mechanism to avoid what they see today as an unavoidable necessity?</li> </ol>	<p>This initiative is supported by the GLA's air quality team</p> <p>Refer to points 1, 2, 7, 12 of officer's comments</p> <p>In line with the aims of the Mayors Transport Strategy and its own policy objectives the Council already promotes the use of more sustainable modes of transport to the private car. These initiatives include cycling and walking schemes, car clubs, improved public transport routes/links, improved public realm, and road safety education.</p>
<p>14</p>	<p>In response to the consultation I write to object to the suggested levy. I bought my new diesel car in 2009 under the government incentive of a low tax band for diesel cars that produce less CO2 than equivalent petrol engines per</p>	<p>Parking permits are not mileage specific</p>

	<p>mile. The car is a seven seater family car predominantly used for longer road trips outside of London at weekend and the average mileage is 7000 miles per year. My business mileage last year was 1000 miles and where at all possible we use public transport. I'm not in a position to buy a new electric, hybrid car or petrol car, as my car is still relatively speaking only slightly over halfway through the time I intend to keep the car. I would have thought incentivising people to invest in new technology might be more considerate than levying a largely unavoidable tax on hardworking families living and working in south Wimbledon for example.</p>	<p>Refer to points 2 &amp; 8 of officer's comments</p>
<p>15</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 113</p>	<p>I am shocked and very upset about the Council's proposed diesel levy. I have a resident's parking permit and a diesel car. I bought my car as an essential means of transport for me – I have to travel extensively for my work as a freelance specialist to quite remote parts of the country – and bought my car when the government was recommending purchasing diesel vehicles.</p> <p>It seems more than unfair, in fact outrageous, that having followed government recommendations and their clear and well publicised support for diesel vehicles that I should now be penalised for my car's fuel type. In addition, some people may concrete over their gardens to avoid the levy and cause run off issues – we already have serious flood problems in our area. I only have a small front garden so this would not even be a consideration for me.</p> <p>In addition, as a pensioner on my own, this levy will impact on my financial situation really significantly. I should be retired now at 66, but because of the deteriorating economy, my savings have been eroded to such an extent that I have no alternative but to continue working – which means I have to use my car, and replacing it for a non-diesel model would be financially impossible. It's hard enough to keep the bills paid and carry on supporting myself without an extra totally unfair charge being made. I object to this proposed levy in the strongest possible terms.</p> <p><u>Further Representation</u></p> <p>Thank you for your email reply. While of course I understand and am personally very concerned about the air pollution issues, as you say 'as an authority we should do what we can to limit the impact and exposure of these poisonous substances impacting on the health of residents in the borough' so I must ask you why the Council has not made tackling air pollution a priority before this levy was suggested?</p> <p>You call diesel cars 'poisonous', but in fact all vehicles are poisonous. How about putting extra penalties on all the fleets of lorries that roar through our borough pushing out massive pollution, especially those taking short cuts through residential roads, before you start penalising your own residents? There are also anti-idling restrictions you could impose or consider providing your residents with an incentive to purchase non-diesel vehicles by reducing residents' parking permit fees. I notice you avoid commenting on the fact that many people, including me, were encouraged ((with false information so it now seems!) to buy diesel vehicles by the government. Now the advice has been proved wrong, it is totally unreasonable to penalise those who followed that 'authoritative' but dangerously incorrect advice.</p> <p>There are many alternative measures the Council and the Mayor of London could introduce to tackle these issues, but the diesel levy is just a quick and easy way to raise funds – and in the process victimise residents. As you say,</p>	<p>Refer to points 1, 2, 5, 6, 10, 12 of officer's comments</p>

	you do indeed have a duty to your residents and victimising them in this way is not acceptable	
16	I fully support the proposal for a levy on diesel vehicles.	Thank you for your comment
17	<p>I wish to object to the manner in which the new diesel levy is being introduced. It is being introduced with very little notice to diesel vehicle owners. Many diesel vehicle owners will have purchased their vehicles based on previous guidelines that favoured diesel over petrol vehicles. These people will be unfairly penalised.</p> <p>I suggest if such a levy is to be introduced, it should consist of phased charges depending on when the vehicle was purchased. For example, someone purchasing a diesel vehicle now should pay the full levy. Someone how has owned a diesel vehicle for many years should pay a small percentage or no levy at all. In this manner, you will discourage the purchase of diesel vehicles in the future without unfairly penalising those who in all innocence thought they were doing the best for the environment at the time.</p> <p>Far better, in fact, would be a levy that took into account emissions from all vehicles which could be introduced with sufficient notice, say 2 years, to enable vehicle owners to prepare. The proposed levy will be a heavy burden on those least able to pay.</p> <p>In addition, the levy on parking does not take into account how much pollution the vehicle is producing, ie how much it is being used. Nor does it take into account every vehicle owner in the borough, for example those with off-street parking facilities. I would like to understand how the revenue from this new charge will be used to reduce emissions in the borough. I do not see any correlation between a parking charge and a reduction in pollution.</p>	<p>Refer to points 1, 2, 3, 13 of officer's comments</p> <p>The phasing and application of the levy was discussed very carefully at Cabinet and Scrutiny and it was agreed that it must be applicable across the CPZs. The approach of phased charges on when a vehicle was purchased would not address the issue as a whole.</p> <p>It would not be practical to base a parking permit on vehicle use.</p>
18	<p>I am writing to you regarding the subject of the proposed introduction of a 'so called' ES/Diesel Levy. The proposed scheme is in clear violation of human rights. It vexes and discriminates a minority of people that up to no long ago were incentivised by the government to switch to diesel for the, back then, beneficial characteristics of this type of engine.</p> <p>More importantly it discriminates against a minority of people not rich enough to be able to afford off street parking, it leaves completely unaffected the visiting diesel vehicles and the people paying by the hour. It does not alleviate in the slightest of ways the problem of the majority of diesel cars not belonging to the Merton council passing untaxed within the borders of the Merton Council.</p> <p>Therefore I challenge this decision on the grounds of discrimination, ineffectiveness and its actual applicability.</p>	<p>Refer to points 2 &amp; 5 of officer's comments</p> <p>There is no evidence to show that this charge will disproportionately impact on poor families</p> <p>The council can lawfully apply the use of parking charges for the reasons of tackling poor air quality.</p>
19	<p>The Council's supporting documentation offers no evidence that introducing this fee on residents vehicles will reduce the level of emissions nor does it show that monies raised will be spent on future anti-pollution measures.</p> <p>Following Islington Council's initial diesel levy in 2015 there has been little evidence that it has been successful in deterring the purchase of fuel efficient diesel vehicles nor an improvement in the borough's air quality. Whilst all residents within the Merton borough are anxious to improve the pollution levels in their area, this appears to be a hasty and ill-conceived levy. The approach of punishing every diesel car owner in the borough is entirely unfair.</p>	<p>Refer to points 1, 2, 3, 4, 7, 10 &amp;13 of officer's comments</p> <p>Traffic and road maintenance and servicing is coordinated by the local</p>

	<p>After all, parked cars do not produce emissions.</p> <p>Rather, it is the older cars/vans/buses/taxis that do not have the automatic stationary engine cut-out that should be identified and encouraged to change and upgrade their vehicles. These are the vehicles that should be specifically targeted with a pollution tariff. Often, they are not even residents of the area and are merely passing through the borough yet the Council find it acceptable to punish the local residents.</p> <p>Alternative options should be investigated by the Council to help clean up Merton's air. For example, easing road congestion, with the coordination of road works must be made a priority. All too often, main thoroughfares in the borough are dug up and left for days with stop/go lights causing unnecessary traffic blockages, all contributing to the poor air quality. These roadwork delays caused by a lack of Council supervision is no fault of any diesel driver yet it is the resident who you want to penalise. These highways must be kept clear to alleviate congestion &amp; provide a free flow of traffic in, &amp; more importantly, out of the Merton zone.</p> <p>In summary, there has been little local consultation on this proposed levy and minimal consideration, therefore I would urge further discussion on the matter before the levy is implemented.</p>	<p>authority as part of its normal function</p>
<p>20</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 115</p>	<p>Again, this levy is targeting the 'low hanging fruit' of local residents, is lazily and hastily conceived and ill applied; it is aimed at 'captive' local residents when a significant portion of the pollution is caused by traffic passing through the borough- parked vehicles don't produce emissions.</p> <p>The proposed levy directly discriminates against diesel vehicle owners who followed government policy advice and switched to diesel as it was described as being more environmentally friendly.</p> <p>The council should instead take steps to ease congestion in the borough. For instance, uncoordinated and inadequately supervised road works on major roads should be monitored to make sure that work is continuous and that stop/go lights are not left in position when works have been completed (i.e over weekends and until works sites have been cleared). Roads exiting the borough should be kept clear as a priority, especially at peak times.</p> <p>Please also explain, when the levy is unrelated to usage how a levy will directly influence behaviour when, in the majority of instances, family and small business vehicles are for essential journeys.</p> <p>In summary I feel that inadequate time, little local consultation and minimal consideration has been given to this scheme and, whilst I agree the issue needs addressing, the council should examine all alternatives before penalising its residents</p>	<p>Given the size and extent of the consultation area, it would have been unfeasible to do a newsletter drop to all properties within all CPZ zones. The statutory consultation was communicated from January 2017 by using the following methods :</p> <ul style="list-style-type: none"> <li>• On the council's website</li> <li>• Advertised in the Local Guardian and the London Gazette newspapers</li> <li>• Via leaflets and posters at libraries, leisure centres and at Merton Link</li> <li>• Via all ward councillors</li> <li>• Via all known resident and business associations</li> <li>• Via local radio station</li> <li>• Via social media including several press release</li> </ul> <p>Also refer to points 1, 2, 4, 6 of officer's</p>

		<p>comments</p> <p>It would not be practical to base a parking permit on vehicle use.</p>
21	<p>I am completely opposed to this tax, the main people you are targeting are the poor and vulnerable, people I have spoken to who are local are outraged, I hope you do not go ahead with this as we also have a rise of 3% on council tax and people are struggling. I hope you reconsider even the idea of this.</p>	<p>There is no evidence that this will disproportionately impact upon the poor and vulnerable</p>
22	<p>Our diesel car, the first we have ever had in our lives, was purchased SOLELY because the Government was pushing the population at the time to buy diesel cars, as better for the environment, despite the fact that it was a more expensive purchase compared with a petrol car.</p> <p>It is totally inappropriate now to tax at a different level any parked car, which is not moving, whether electric or diesel - as it's not using any fuel of any sort while parked. If you wish to 'encourage and incentivise diesel vehicle owners to consider adopting lower or zero emission technologies', then why not either tax new diesel cars at a higher rate, or pay diesel owners a reasonable amount to scrap their cars and buy new petrol ones? This proposal definitely won't encourage me to sell my car until I choose to, but pay me a fee towards changing my car (as scrappage schemes run by the Government in the past) would be the only way to encourage me to do so.</p> <p>It is not only totally inappropriate to discriminate against those very purchasers the Government encouraged to buy diesel cars in the first place but to add yet another stealth tax is going too far.</p> <p>Why even bother to ask us now, when you have decided exactly what you are aiming to do? Whatever happened to democracy?</p>	<p>Refer to points 1, 2, 5 of officer's comments</p> <p>The Council is responding to the recent and emerging evidence regarding the impact of diesel vehicles on London and Merton roads</p>
23	<p><u>1<sup>st</sup> Representation</u></p> <p>I am a Merton resident and permit holder in the Wimbledon Park ward and have a few queries with the proposal to introduce a levy to the Parking Permit for diesel vehicles. I'm not sure if you are able to answer all of the queries, it would be appreciated if you could forward the queries to council officers/departments as appropriate and let me know who is dealing with the query.</p> <p>"The introduction of a levy charge for all diesel vehicles that have a Resident, Business or Trade parking permit with the introduction of £150 levy phased over a 3 year period - £90 in 2017/18, £115 in 2018/19 and £150 in 2019/20."</p> <p>1) Can you confirm that, as this is a levy the total cost for diesel owners for parking permits will rise to £155 in 2017/18, £180 in 2018/19 and £215 in 2019/20?</p> <p>2) Can you confirm that the purpose (or one of them) of the levy is to persuade residents to change to vehicles that will produce less air borne particulates (Petrol / Electric)?</p> <p>3) Please comment on intentions for the expected additional revenue of £516,000 in 2017/18 to £861,00 in 2019/20. (noted in appendix 2 of document</p>	<p>Refer to points 4,5,7,12,13 of officer's comments</p> <p>In response to the precise question raised in 1) the answer is No the levy is an additional cost to the type of resident, business and trade permit purchased that is for a diesel powered vehicle.</p> <p>Listed below is the diesel levy effect for three types of parking permits affected based upon the following levy (additional) £90 in the first year, £115 in the second year and £150 in the third</p>



<http://democracy.merton.gov.uk/documents/b8765/Supplementary%20Agenda%20Monday%2014-Nov-2016%2019.15%20Cabinet.pdf?T=9> )

Allowed usage of additional revenue is understood to be:

- 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

How much will be used to reduce stop/start traffic, traffic idling and other measures to reduce traffic pollution? When will these plans be announced?

4) What rebates (if any) will be offered to Motability/disabled badge owners, retired residents, carers etc.?

"That the Council reviews the impact of the diesel levy for a period of 2 years, with a view to the introduction of comprehensive emissions based parking scheme."

- 1) What is the scope of the review?
- 2) What are the targets in reduction of particulates in the borough over the review period?

The introduction of the levy on parking permits will affect residents currently in resident parking zones with in Merton.

As noted in the above document, there has been an increase in the number of diesel vehicles, so diesel ownership across the borough will potentially rise for resident in non-parking zone areas.

- 3) Is there an estimate for the number of vehicles crossing/arriving in the borough from non-Merton residents?
- 4) Is there an estimate (percentage of total) for the borough particulate pollutants generated by the major London road arteries the A3, A24, A217, A236, A237 and A296?

"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"

1) Will this include introducing parking permit schemes across the whole borough, so that all residents can benefit equally from the scheme?

year.

Business Permits currently cost £802 for a 12 month permit which will be subject to the following additional charge for all diesel vehicles of £90 in the first year, £115 in the second year and £150 in the third year.

Trade permits cost £900 for a 12 month permit which will be subject to the following additional charge for all diesel vehicles of £90 in the first year, £115 in the second year and £150 in the third year.

In the case of resident permits there is a separate 3 tier charging policy:

- the first resident permit purchased for an address the charge is £65 plus the diesel levy where applicable
- the 2nd resident permit is £90 plus the diesel levy where applicable
- all subsequent resident permits are £140 plus the diesel levy where applicable

All of the above charges are subject to the 3 year phased increase (1st £90, 2nd £115 and 3rd £159)

The pollution of primary concern and the one that Merton consistently exceeds is NO2.

Blue badge holders will not be charge the diesel levy this exemption does not apply retired residents or carers and will

2nd Representation

Can you kindly let me know how the email below is being treated?

Are the queries forwarded to a central process/committee?

Should I expect a response?

Is there a public meeting that I can attend?

3rd Representation

Thank you for the information below.

Am I correct in my understanding of the council terminology used?

Statutory consultation - let some people know about the proposed changes/plans - and request feedback on concerns.

Cabinet member decision - I'm not clear on this. A cabinet member is a councillor given certain remit to lead (e.g. Environment). Feedback will be given (in an overall document of responses?) once a decision on how to proceed (or not) is finalised by the cabinet?

Will this be when council employees (Environmental officers, Traffic management staff etc) also give their professional opinions on the proposals and likely outcomes?

Called in - found info on the Merton web-site

<http://democracy.merton.gov.uk/documents/s12256/ConstitutionPart4E2016.pdf> - so if the proposals are challenged, then they could potentially be "called in" to have more (outside bodies?) review completed in a scrutiny meeting. As Merton Council want to reduce particulate emissions to improve peoples health, then NHS advisers will review the proposals/assess likely outcomes??

4<sup>th</sup> Representation

Please add the following representation for review in the consultation.

The attached spreadsheet contains information from the London Atmospheric Emissions Inventory 2013.

"The LAEI 2013 is the latest version of the London Atmospheric Emissions Inventory and replaces the previous versions.

Estimates of key pollutants (NOx, PM10, PM2.5 and CO2) are included for the base year 2013 and projected forward to 2020, 2025, and 2030. Emissions for previous years 2008 and 2010 are also provided, to allow comparison with previous versions of the LAEI.

The LAEI area covers the 32 London Boroughs and the City of London and up to the M25 motorway"

be subject to a review after 2 years as part of an introduction of admission based policy.

The Council does not hold data on trip generation by non-Merton residents.

For information on generation of particulate pollutants  
<https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory-2013>

Given the size and extent of the consultation area, it would have been unfeasible to do a newsletter drop to all properties within all CPZ zones. The statutory consultation was communicated from January 2017 by using the following methods :

- On the council's website
- Advertised in the Local Guardian and the London Gazette newspapers
- Via leaflets and posters at libraries, leisure centres and at Merton Link
- Via all ward councillors
- Via all known resident and business associations
- Via local radio station
- Via social media including several press release

This above 2013 data is actual data and is therefore more accurate and recent to the data supplied in the Council Report (14 November 2016).

<http://democracy.merton.gov.uk/documents/b8765/Supplementary%20Agenda%20Monday%2014-Nov-2016%2019.15%20Cabinet.pdf?T=9>

The data supplied in "Table 1: Annualised emissions for 2015 from the LAEI in Merton in tonnes per year" looks to have been supplied from the 2008 report and based on that reports projection for 2015. So these are not actual figures.

The differences between the reports "Published - 2008 data projection for 2015" and actual 2013 data.

Examples for Merton Borough:

Petrol cars produce 8% of total NOx; Latest actual data shows this is 14%

Diesel cars produce 37% of total NOx; Latest actual data shows this is 27%

Petrol cars produce 36% of total CO2; Latest actual data shows this is 42%

Diesel cars produce 31% of total CO2; Latest actual data shows this is 23%

Another troubling aspect of Table 1, is that it only lists pollutants levels from vehicle exhaust emissions (PM10). PM10 (and PM2.5) pollutants come from vehicle exhausts, brakes and tyres. The attached table shows the values for all vehicle types showing pollutants PM10 and PM2.5 from all sources (Exhaust, Brakes and Tyres). The difference in the source and values listed again shows large discrepancies. Examples for Merton Borough:

Petrol cars produce 9% of total PM10 exhaust; Latest actual data shows total PM10 value is 33%

Diesel cars produce 48% of total PM10 exhaust; Latest actual data shows total PM10 value is 30%

Diesel vehicles are dirtier for PM10 and PM2.5 emissions per vehicle, but table 1 in the document massively overstates this, by ignoring the fact that petrol cars produce 97% of their PM10, and 94% of their PM2.5 pollutants from the brakes and tyres. Not something that cars/vans can do without!

Also in attached spreadsheet, are the results of an unscientific street survey I undertook today (between 10:30 and 11:15). The parking tab in the spreadsheet shows the high number of cars parked after the morning rush hour/commute. I did not take in all the P2 CPZ roads - but 85% of cars/vans given permits for the roads surveyed were parked. This should be expected with high numbers of people using the District Line (and local buses) to commute to London & Wimbledon. So the majority of people with diesel cars in Wimbledon Park will be paying a high levy for owning a vehicle but not using it!

Also refer to points 1 of officer's comments

The Cabinet decision was subject to Scrutiny and the original decision was not changed

The use of LAEI 2008 predicted data was chosen as this was standard practice at the time of drafting the report. It is also important to note that this was used to set the scene for the report and the use of 2013 or 2008 data would not have altered any of the conclusions and recommendations of the report

The regulated emission that Merton fails is NOx and not PM. So the focus on brake and tyre wear, although noted, is not necessarily relevant.

Recent studies from the DfT show that all Euro 6 diesel cars understate their real world emissions for NO2. Therefore much worse than we thought.

The analysis of importance carried out by this report was the review of the vehicle makeup that we can influence, or those with permits. We reviewed all of these vehicles based upon the individual vehicle, real world driving and the subsequent emissions. It was very clear that diesel vehicles were the worst pollution for NO2, and therefore the emissions levy was focused upon those

		vehicles, with scope to extending this to all vehicles dependent upon the 2 year review.
24	<p>I am in principle supportive of the initiative to levy a levy on polluting vehicles. However a levy must be levied in a sensible way, especially when it comes to vehicle ownership. Most of us don't buy new cars every year / at three month's notice. Hence it is nearly impossible to change behaviour at such short notice that the council is proposing.</p> <p>By introducing £90 levy starting a few months from now is clearly just a mechanism to raise tax revenues and it is not fair on us residents. If you give the residents a reasonable chance to change behaviour (of at least one year) I can accept this.</p> <p>With most expenses relating to vehicle ownership it is very likely that once people are used to a cost, it is no longer serving as a dis-incentive to the extent expected originally. For example vehicle mileage only has a very small correlation to cost of fuel. Hence if we are already used to paying a fee, we will be less likely to change to petrol vehicles to adhere to the objective.</p> <p>I would like the council to explain why diesel vehicles that use off-street parking (or on-street in an area without CP) are not levied a levy. Are these diesel vehicles somehow deemed less harmful?</p> <p>Also can the council please explain what proportion of harmful pollutants in the area come from diesel vehicles using on-street parking / subject to the levy vs. through traffic and diesel vehicle parking on driveways etc? If the levy simple pushes diesel vehicles to park on driveways (as it will for us and we will park our petrol car on-street) the tax is not properly designed.</p> <p>Finally, if I have paid the levy but change cars to a petrol car mid year, will I get a partial refund? A refund will of course help change behaviour...</p>	<p>Refer to points 1, 4, 5, 7 of officer's comments</p> <p>Any refund will be made as per current refund process</p>
25	<p>My wife and I live at XX XXXXXXXXXXXXXXX and have been resident in Wimbledon for almost 30 years now. We both strongly object to the proposed imposition of a levy for parking permits for diesel vehicles in the Merton area.</p> <p>Ignoring the fact that for many years the public was encouraged to purchase diesel vehicles for economic reasons (and so it seems hypocritical now to levy a tax as a result of following the recommendations), this clearly has nothing to do with the environment but is purely a revenue raising mechanic. It ignores the basic facts that far more environmental harm from pollution is caused by:</p> <ul style="list-style-type: none"> <li>• Constant lorry and heavy vehicle movement through Wimbledon – none of which will be subject to the levy regardless of the fact that they are parked on a regular basis</li> <li>• Public transport – buses in particular – cause far more pollution.</li> </ul> <p>If the Council genuinely wanted to reduce emissions it would restrict the movement of lorries through residential areas. It would also seem appropriate to levy a charge on all commercial lorries and public transport with</p>	<p>Refer to points 1, 2, 10 of officer's comments</p>

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	<p>scheduled use of Merton streets. And an additional levy at public car parks and parking machines. This levy is entirely arbitrary and will make no material impact on the environment: all it does is penalize residents who may have followed previous public recommendations. A wholly irrational and arbitrary suggestion that no reasonable Council would implement. We are emphatically against the proposal.</p>	
26	<p>We have only just been told about Merton's plan to introduced a levy on diesel cars. We were encouraged by the Government to buy a Diesel car nearly 10 years ago and did so, at the time they were considered an environmental friendly option, therefore it is not our fault. We are pensioners and object to this levy.</p>	<p>Refer to point 2 of officer's comments</p>
27	<p><u>1<sup>st</sup> Representation</u>  Thanks for coming back to me - your prompt response is much appreciated. Whilst I do appreciate that there is a need to tackle air pollution in London and that local authorities have limited powers to dissuade use of diesel cars, I do feel that the increase to the cost of residents' permits for diesel car owners in the borough by such a large amount is not only arbitrary but a punitive tax that is likely to hit those who need help with the disposal of their vehicles hardest.</p> <p>The air pollution in Merton does not just come from residents but from the thousands of vehicles that drive through the borough on a daily basis to make deliveries, commute to work or travel on to other boroughs. It also comes from large vehicles and lorries including the council's own contractors who, presumably, are not going to be penalised.</p> <p>Of course, there are also those cars (in particular 4x4s) that are owned by those drivers who live in Merton that are fortunate enough to not have to pay for resident permits because they have their own off-road parking.</p> <p>If the cost of the parking permits is to be increased for diesel car owners then what guarantees can the council give to ensure that those monies are specifically ring-fenced to tackle air pollution? What is this money going to be used for and will there be transparency in how it is used?</p> <p>Thank you for copying in the Traffic and Highways team - by copy of this email to them I would be grateful if someone could respond to these queries and also confirm that my concerns and views are included in the consultation process. The other way that drivers could be dissuaded from driving into Wimbledon Town Centre would be to increase the parking restrictions in the lower half of South Park Road from Trinity Road either to Bridges Road or further on to Haydons Road which could then reduce the air pollution within the borough. (This could also happen in other neighbouring roads).</p> <p>I and other residents of South Park Road have seen a huge increase in the volume of traffic parking on South Park Road - particularly after 6.30 and on Sundays when the parking restrictions end. Vehicles without parking permits often park on this section of South Park Road as it is the first part of the road where the traffic restrictions are relaxed (the other half of South Park Road from Trinity road to the town centre having restrictions until 11pm and on</p>	<p>Refer to points 2, 4, 10 &amp; 13 of officer's comments</p> <p>There is no evidence that this will disproportionately impact upon those who need help with the disposal of their vehicle</p>

<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 122</p>	<p>Sundays).</p> <p>The road is effectively used for free parking being a short walk to the town centre, the theatre, the YMCA, the leisure centre and local restaurants and bars. This will only get worse when the car park next to the theatre closes and the Premier Inn is built (which has no parking for hotel guests included in the plans).</p> <p>We are often told when there is a planning application that has no parking in the plans that this is because Wimbledon has good transport links and that people either do not own cars or do not drive them.</p> <p>Unfortunately, this is simply not the case and unless the Council does not act to make it more difficult for vehicles to park close to the town centre then I cannot see how air pollution is going to reduce. I should be grateful for your views on this and also any comments that the Traffic and Highways team have.</p> <p><u>2<sup>nd</sup> Representation</u></p> <p>Of course this penalises those drivers (like me!) who purchased their cars in 2005 when we were actively encouraged to buy a diesel car as they were supposedly better for the environment than a petrol vehicle! This I did in good faith. If I could afford to change my car to a petrol one I would but it's not possible financially for me.</p> <p>By copy of this email, I would request that Mr Hammond MP and/or Councillor Garrod look into this anomaly and see if there can be any concessions for "innocent" drivers like me who are now to be penalised for relying on misinformation when buying a diesel car was considered to be the right thing to do for the environment.</p>	
<p>28</p>	<p>I am emailing to strongly object to your proposal to add a levy to the parking permit annual charge. We bought our car in good faith that diesel was a cleaner fuel than petrol and it is grossly unfair to punish those who have already bought a car. We do not change our car regularly - we had our last one for at least 10 years - and thoroughly object to this charge. As car owners in a built up area we are already being penalised enough in that we now have to pay for the privilege of parking our car outside our house.</p> <p>We use public transport to go to work so it is not as if we are heavy pollutants in the area. The car we own has an inbuilt mechanism whereby the engine cuts out if the car is stationary. If you are going to introduce this levy it would be fairer to add it to those new applicants who are applying for permits with a diesel car rather than retrospectively.</p>	<p>Refer to points 2 &amp; 5 of officer's comments</p>
<p>29</p>	<p>I am the owner of a diesel car and was upset to see your plans to increase the cost of parking permits.</p> <p>One of the major factors in purchasing a diesel car for me was its fuel efficiency. Also, at the time diesel was considered to be a more eco-friendly alternative to petrol, and a diesel car was even endorsed by the Green Party for environmental reasons around 2008. For these reasons, diesel was generally a more expensive type of car. Your proposal is based on new research that indicates local air quality is negatively impacted by diesel cars.</p>	<p>Refer to points 2 &amp; 5 of officer's comments</p> <p>There are already established recycling facilities for vehicles</p>

	<p>I would like to raise a few points:</p> <ol style="list-style-type: none"> <li>1. If the bill does make people replace their diesel cars, surely the environmental burden of disposing these vehicles and replacing them would be considerable.</li> <li>2. The increase is unlikely to motivate people to replace their cars. Hybrids and electric cars are an expensive category of car. For wealthier vehicle owners, an increase in parking price is unlikely to make them truly consider replacing their vehicle. For the less wealthy, it will simply price them out of owning a car, as they will not have the money to replace the vehicle and may not have the money to pay for an increase in parking fees. This is simply an extra tax on already extremely costly vehicle ownership.</li> <li>3. This is a tax on parking. A parked car is not in use, and thus not polluting the air. The tax is thus extremely indirect. It would make more sense to tax the use of diesel vehicles, not the right to have a space to put it in. A parking place is same for a diesel, petrol or electric car.</li> <li>4. This is a morally unjustified punitive measure for a decision (to buy a diesel car) made in good faith based on the best information available at the time. The tax, if anything, should be for new diesel cars, not old vehicles purchased with good intent before this new research came to light.</li> </ol> <p>These seem entirely reasonable objections, so please take the time to consider them.</p>	
<p>30 Page 123</p>	<p>With reference to the proposed levy to be charged on diesel cars which have parking permits issued by the London Borough of Merton I would like to make my views known on this subject.</p> <p>Under the previous Labour government, a party under which the present borough council has a majority, we as motorists were encouraged to switch to diesel cars which were deemed to be more "environmentally friendly". This people did in their millions to the extent that the majority of cars now sold in this country are diesel.</p> <p>It is also a fact that Euro 6 regulations means that a vast number of diesel cars are CO2 and NOx compliant and in many ways as good or better than their petrol equivalents.</p> <p>We are now told by Merton Council that in order to encourage car owners to move away from diesel (the complete opposite advice from the Labour government) they will "punish" ALL diesel cars and their owners by arbitrarily adding punitive levys on parking permit holders. The fact that other diesel owners who have the good fortune to park off the public highway and buses, taxis, lorries together with all the cars that drive through Merton, which according to the logic of Merton Council cause untold damage and pollution to the environment, will not be subject to any levy.</p> <p>This fact alone proves that the proposals are discriminatory and are being used by the Council to fill their "coffers" and target one section of the motoring public using them as a "cash cow".</p> <p>By attempting to introduce these measures in such a hasty fashion the Council have apparently failed to take in to</p>	<p>Refer to points 2 &amp;3 of officer's comments</p>

	<p>account certain difficulties faced by those motorist who will be affected by this.</p> <ol style="list-style-type: none"> <li>1. The number of diesel cars owned, in a lot of cases at great expense, means any attempt to sell them and move to petrol would "flood" the second hand market with cars that are perceived as undesirable and as a consequence prove difficult to sell with possible financial loss.</li> <li>2. Many owners, myself included, have these cars on a fixed term lease and are unable to change until its expiry without financial penalty which I, and I am sure many others, would not be able to bear.</li> <li>3. Many diesel cars are now compliant with Euro 6 and meet the NOx levels which is at odds with Merton Council's claim that they harm the environment and therefore should not punished.</li> </ol> <p>wish to strongly object to the way Merton Council has approached this subject. The fact that these measures are being brought in at such short notice and in such a discriminating way will have serious consequences for many people who have been given no means to avoid this.</p> <p>The fact that all diesel cars with parking permits are being targeted when some actually produce less pollution than some petrol cars is extremely unfair and the Councils plans should be shelved until it is proved to be conducted in a way that takes all these considerations seriously.</p> <p>I would like the Council to reply to points raised and not by the way of a standard bland acknowledgement.</p>	
31	<p>I am responding to the consultation for traffic management orders to CPZs to apply a tax on diesel vehicles.</p> <ol style="list-style-type: none"> <li>1. The imposition of an immediate tax on diesel owners is unjust. I purchased my diesel vehicle less than 2 years ago when diesel vehicles were being advertised as a greener option to petrol. I acted on misinformation spread by central and local government, and the manufacturers.</li> <li>2. I am tied into a 4 year purchase agreement. To tax me immediately does not allow me to change my motoring behaviour, or allow me to see whether I can extract myself from this agreement and buy another car. Whatever I do, I will suffer a financial loss as a direct result of Merton Council's decision.</li> <li>3. Merton Council's policy does not take account of the pollution of non-local vehicles, or of vehicles which are not parked in a CPZ, and therefore it does not apply to all vehicles: it is a selective punitive tax on residents who pay for a car parking facility.</li> </ol> <p>To introduce this change now makes it a clear punitive tax, and not a mechanism for changing people's behaviour, otherwise Merton Council would allow for a period of adjustment and education</p>	<p>Refer to points 2, 4, 5 7 and 10 of officer's comments</p>
32	<p>Successive Labour Governments encouraged the use of diesel vehicles. Having done so</p> <ol style="list-style-type: none"> <li>1. why are placing punitive taxes on those who followed their policy.</li> <li>2. why is this tax being levied disproportionately. It is only being levied on this people in those areas which require Parking Permits</li> </ol>	<p>Refer to points 1 &amp; 5 of officer's comments</p> <p>All Councillors are allowed to park at the Council Offices car park at no</p>



	3. I have been told that Councillors parking near or at the Council Offices are not required to pay for Parking Permits. Is this correct?	charge. 2 senior Councillors are allowed a parking permit to park on street for which a charge is paid.
33	<p>I am shocked to hear about the special parking fees planned by Merton on diesel cars. If the real aim is to reduce pollution and emissions a cross borough and London wide scheme should be adopted. How is a Merton resident's car pollution different from that of a car driven in whole of our neighbourhood by an owner who resides in Mitcham or Wandsworth. We need joint up action instead of penalising just Merton residents.</p> <p>Moreover, as a parking permit holder I have not been consulted at all and presented with facts and choices on this matter. I would urgent the team to reconsider their proposals and follow due process and consultation and also aim to be fair to their own residents instead of aiming to pass back door regressive taxes.</p>	Refer to points 5 & 10 of officer's comments
34	<p>I understand that the Council is proposing to bring in a levy on diesel vehicles as early as this April, with a surcharge for parking permits and business permits, that is likely to increase in future years.</p> <p>Please take this e-mail into account in reply to the public consultation that you are (belatedly) undertaking. While I understand that modern research shows that such vehicles bring health issues, there does need to be a period of time for public education and during which people are able to change vehicles, otherwise the costs to them will be inordinate.</p> <p>Most people change their vehicles only every three years or so, and those who have recently bought such a vehicle will be heavily penalised, given the depreciation in value. If the proposal has merit, it should be introduced over a number of years.</p> <p>The proposal will also hit hardest those who are less well off, as they can ill afford to change their vehicle, simply to avoid extra costs. Further, there seems little evidence of such bad air pollution in Merton that it is vital to introduce this scheme at such speed. I trust that the Council will defer the introduction of the scheme at this time.</p>	<p>Refer to points 1 &amp; 5 of officer's comments</p> <p>There is coordination currently underway within the GLA and nationally through DEFRA</p>
35	<p>I was shocked to learn from the Union of Wimbledon Residents Association's newsletter that Merton Council have decided to introduce a levy of up to £150 on parking permits in Merton if you own a diesel car. This seems an unfair charge for diesel owning residents (it is not a dictatorship). As a pensioner on a fixed income how can I put my hand in my pocket every time someone comes up with a 'money making scheme'. I have a number of questions I would like addressed:-</p> <ol style="list-style-type: none"> <li>1. What will Merton do about diesel cars parked on residents drives, if they do nothing this will be discrimination against residents who have to park on the road?</li> <li>2. What does Merton council propose to do about the diesel cars, vans, lorries, buses and taxis that drive around and through Merton every day? These are the major polluters not residents, so to penalise residents is not going to make one jot of difference as 90 per cent of my journeys are long distance on motorways I would argue that any pollution in Merton from my car is minimal.</li> </ol>	Refer to points 1, 3, 4, 5 & 10 of officer's comments

	<p>3. Every make and model of diesel car needs to be assessed and tested separately and compared to the same petrol car with the same test. My car is a 2016 model with a 'particulate filter' so I would strongly argue it is no more of a pollutant than a petrol car of the same model. This should be taken into account when setting a levy.</p> <p>I find the charges introduced by the London Borough of Kensington &amp; Chelsea (£19 extra per permit) and the London Borough of Camden (£10 extra per permit) more acceptable. As it is I find a rising charge to £150, on top of my parking permit charge, staggering! I look forward to hearing from you.</p>	
36	<p>The proposed levy to be placed on diesel owners in controlled parking zones (CPZs) only is not the answer to the pollution problems in Merton - many lorries, buses, taxis and vans drive through Merton towns on a regular basis - will they have to contribute? The majority of CPZs are in the Wimbledon area again - why should people who own diesel cars, because they do not have an off road parking space, be held to ransom by the council?</p> <p>For my part I have a new diesel car which has a 'particulate filter' I do not drive into Wimbledon town centre - most of my driving is motorway - I am also a pensioner on a fixed income. I do not believe the council have thought the proposal through - I have also been in touch with the national press - as the subject of council's introducing levys (which may not be legal) are being accused of making diesel car drivers into 'cash cows'.</p>	Refer to points 1, 3, 5 & 10 of officer's comments
37	<p><u>1<sup>st</sup> Representation</u></p> <p>Further to an earlier email - I am again writing to you to emphasize the unfairness of the proposed levy on diesel cars in CPZs only. I am going to be penalised for having a diesel car even though it is fitted with a 'particulate filter' - simply because I have to pay to park in my road - can you let me know why? What will the sums raised be used for - will the council be targeting the real polluters i.e. lorries, buses, taxis etc?</p> <p>I feel I am being punished on behalf of the whole borough - this is grossly unjust. How many other cars in the London Borough of Merton will be targeted in this way i.e. the diesel cars in CPZ's only? Is there going to be a consultation on this as it has being implemented a short notice? I look forward to hearing from you</p> <p><u>2nd Representation</u></p> <p>As the cabinet member responsible for the diesel levy can I please have answers to my questions raised in my earlier email addressed to Mr Alambritis as follows:-</p> <p>1. Why are you making diesel car owners in controlled parking zones responsible for the whole of the pollution in Wimbledon town centre? As stated before I have a new diesel car which is fitted with a 'particulate filter' I do not drive into Wimbledon town centre - surely your unrelenting approach to the air quality in our borough should include all diesel vehicles i.e. diesel cars parked on driveways those outside the controlled parking zones, lorries, taxis, buses etc where is the fairness in what you are suggesting?</p> <p>How many controlled parking zones are in the other areas within the London Borough of Merton - or are the diesel owners in Wimbledon to be responsible for the whole of the boroughs air?.</p>	<p>Given the size and extent of the consultation area, it would have been unfeasible to do a newsletter drop to all properties within all CPZ zones. The statutory consultation was communicated from January 2017 by using the following methods :</p> <ul style="list-style-type: none"> <li>• On the council's website</li> <li>• Advertised in the Local Guardian and the London Gazette newspapers</li> <li>• Via leaflets and posters at libraries, leisure centres and at Merton Link</li> <li>• Via all ward councillors</li> <li>• Via all known resident and business associations</li> <li>• Via local radio station</li> <li>• Via social media including several press release</li> </ul>

	<p>2. Westminster council may have approved a levy but it is nowhere near as high as the one which the London Borough of Merton intend to implement - I am not even sure this is legal.</p> <p>I will also be forwarding an email to the Traffic and Highways division of the council.</p> <p>It is not for you or the London Borough of Merton to tell me what I can and cannot drive- your concerns and efforts should be with the manufacturers to produce cleaner diesel vehicles and not punishing people who thought they doing the right thing.</p>	<p>The Charge will apply to all CPZ's</p> <p>The Local Authority is legally entitled to use Parking Fees as a way of tackling air quality</p> <p>Also refer to points 1, 2, 3, 6 &amp; 10 of officer's comments</p>
38	<p>The tax is unfair and discriminatory. Six years ago we bought a diesel car because we thought we were contributing to cleanliness in the environment as a direct result of advice given by the government.</p>	<p>Refer to point 2 of officer's comments</p>
39	<p>I strongly object to the proposed Diesel levy to be introduced from 1 April 2017. The proposal is clearly discriminatory as it only applies to residents who live in a CPZ and have no alternative but to park in the road. Many of the poorer residents of the borough will have to pay while richer residents with off street parking will not. Why is the levy set so high compared to other boroughs in London, this is clearly set to raise money to fill the councils coffers. If it was really about the environment then all diesel vehicles would be paying the Levy. The council is being very two faced about this levy which should only be introduced when the councils 180 odd diesel vehicles have been replaced and we have a level playing field. The dust carts and other Merton vehicle's which are used all day cause far more pollution than private cars that are used far less often. This Labour council should remember that it was past Labour governments which actively encouraged motorists to buy diesel cars.</p>	<p>Refer to points 2, 5, 6 &amp; 11 of officer's comments</p> <p>There is no evidence that this will disproportionately impact upon those poorer residents of the borough</p>
40	<p>I have become aware that Merton Council plan to vote on an increase to the cost of parking permits for the owners of diesel vehicles, which would become effective from April this year, and increase year on year following this.</p> <p>As a Merton resident and an owner of a (2007) diesel car I am extremely concerned about this. Not only does this break an election promise, it seems to me to me nothing more than yet another fund raising exercise on behalf of Merton Council that is disguised as a green levy. I urge you to reject this plan and await your response</p>	<p>Refer to points 1, &amp; 13 of officer's comments</p>
41	<p>Quite frankly this proposal is a disgrace. An immediate penalty for driving a car that up until very recently was vaunted for its 'greener' credentials.</p> <p>How you possibly come up with a penalty based purely on NOX is beyond me. The science of air quality and associated health benefits is purely subjective. You have no 'proof' that NOX is any worse than CO2 for instance.</p> <p>I am not against efforts to improve air quality, far from it, the general initiative is welcome. There must be far fairer ways to achieve this however than a thinly veiled cash grab on undeserving diesel driving residents.</p> <p>At the very least delay the onset for diesel drivers by 3 years to give them a chance of changing their car. Charge the levy for all new diesel cars applying for a permit after 2017 for instance. In the meantime accept that all motor vehicles are contributing to poor air quality and charge a flat £50(for example) to make up your budget shortfall.</p>	<p>Refer to points 1, 2 &amp; 5 of officer's comments</p>

I have been made aware by a local residents' association that there is a consultation under way in to a proposed levy to be applied to parking permits for drivers of diesel cars. Since this would directly affect our household, as we have permits for 2 cars in a CPZ, one petrol and one diesel, I would like to input to the consultation. It would have been preferable if affected households had been informed by letter, since the council obviously holds all the relevant data to administer the parking permit scheme.

I have 3 main objections:

### 1) Fairness

There is a significant annual cost to a relatively small number of residents under the proposal. There is a degree of arbitrariness in which residents would face increased costs, since the cost only falls on those with parking permits and not those living outside CPZs or with off-road parking. This is in contrast to the health impacts the proposal seeks to mitigate, which relate to pollution produced when driving, not when parked. For example, a resident with a diesel car parked in a CPZ who rarely drives far within the borough pays the diesel levy, while another with the same car who parks off-road and daily drives back and forth through busy areas does not. Changing cars is not cheap and many will have been bought when diesels were considered the lesser evil, and indeed incentivised compared to petrol cars.

### 2) Effectiveness

Nowhere in the documents can I find an estimate of what proportion of vehicle journeys made within the borough are actually made by CPZ permit holders. I estimate that it is likely to be a small proportion, since many residents are not in a CPZ or have off-street parking, and many journeys in the borough will start outside the borough anyway. To understand this point, consider that the A3 running through the borough is highlighted as one of the most polluted roads. Clearly only a very small proportion of vehicles driving along it would belong to MBC parking permit holders. Local roads will not be as extreme, but I reckon a fair estimate might be 10-20% of journeys in town centre pollution hotspots could be by parking permit holders, of which 1/3 might be 'in scope'. Further to this, almost all of the most polluting vehicles (diesel HGVs, vans, buses, etc) are not going to be permit holders anyway. So a very high proportion of polluting vehicles will not be affected at all, and the effect of the narrow targeting of the scheme is likely to be de minimus, even if the incentivisation effect were strong.

### 3) Practicality

Introducing the scheme almost immediately means it is effectively a retrospective tax until you can next afford to change car. Only applying the levy to newly registered permits for, say, three years would preserve the incentive to change while allowing some time for residents to do so. Although obviously, given you are parking on-street in a CPZ, a plug-in electric vehicle is not going to be a practical alternative anyway.

So in summary, the proposals are unfair, ineffective and impractical. There is already incentivisation through the vehicle and fuel tax systems related to emissions and driving behaviour. This proposal uses twisted logic to link parking permit charges to pollution reduction, and it will raise a bit of revenue, but it is clear that this is not the most

Given the size and extent of the consultation area, it would have been unfeasible to do a newsletter drop to all properties within all CPZ zones. The statutory consultation was communicated from January 2017 by using the following methods :

- On the council's website
- Advertised in the Local Guardian and the London Gazette newspapers
- Via leaflets and posters at libraries, leisure centres and at Merton Link
- Via all ward councillors
- Via all known resident and business associations
- Via local radio station
- Via social media including several press release

Also refer to points 2, 4, 5 & 10 of officer's comments

	<p>sensible lever to pull but the one within MBC's reach. In terms of reducing pollution, it is analogous to the drunk searching for his lost keys under the lamppost.</p>	
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 129</p>	<p>43 I have read through the proposal to introduce a levy on diesel cars in Merton that have parking permits. As a diesel car household with a parking permit I wish to object on the grounds that this is unfair and discriminatory. What about all other diesel cars owned in Merton who benefit from off-street parking ? How many are there of these?</p> <p>If I had run the research study I would want to find out what the diesel car population of Merton is. What is the proportion of diesel cars with parking permits relative to all diesel cars in the borough? Surely the DVLA could have provided details of all diesel car owners in Merton or would this fall foul of data protection?</p> <p>How people use their diesel cars is also pertinent. We rarely use ours apart from driving long-distances as we were told by the government that diesel was more economic and emission friendly. Electric cars are not an option for us for long-distance travel.</p> <p>We now use public transport where we can and have a small petrol car that we may consider changing to an electric one for around-town driving . Many residents with diesel cars will pollute far more than us if they commute/ do school runs regularly. What about all the commuters in diesel vehicles who travel through Merton polluting our air? What studies have been done to find out how many transiting diesel vehicles are involved?</p> <p>It seems to me that the council has to be seen to be doing something to meet this EU directive and at lowest cost using outsourcing to top-down experts whose report is not easy reading for a lay person and no evidence of validation. Undertaking a full survey of diesel car owners and then generating and evaluating options in the context of Merton's air quality and providing the public with a full review of the air that we all breathe would have been far more equitable and informative given the deaths it is likely to cause. Democracy is not working as all diesel car owners living in Merton and travelling through the Borough are not being treated fairly and those who have parking permits (and whose data readily can be used) having to bear the burden for Merton's air quality.</p>	<p>Refer to points 1, 3, 5 &amp; 10 of officer's comments.</p> <p>The councils study investigated the option of all vehicles being subject to the CPZ charge and Diesel cars were shown to be disproportionately polluting.</p> <p>It would not be practical to introduce a levy based solely on vehicle mileage</p>
<p>44</p>	<p>It seems to me that most of the diesel pollution in Merton is caused by vans and trucks passing through (and particularly those driving over the speed limit and using residential roads illegally as cut throughs from Wimbledon Broadway to Haydens Rd ).</p> <p>You are chasing soft targets, namely those who have smaller diesel cars living in crowded roads where they do not have off street parking ( unlike those driving huge 4 x 4's in larger houses with off street parking). t would be much fairer if you charged a levy on ALL diesel cars registered to owners living in Merton as this would catch the larger vehicles in the larger houses who still drive all over the Borough causing pollution.Also, you could charge a diesel levy on all builders carrying out work in the Borough as their vans are inevitably diesel and the skips/vans/trucks delivering on site are too. I don't drive a diesel but can see the inherent unfairness in targeting those who bought in good faith, believing they were better for the environment. You won't help the pollution by charging extra, you'll just make some hard needed cash for the Council. It will be spent on shortfalls rather than in reducing pollution.</p>	<p>Refer to points 2 &amp; 5 of officer's comments</p>

45	<p><u>1st Representation</u></p> <p>I refer to your plan to victimise drivers of diesel fuelled vehicles by introducing a levy. To be honest Merton council never ceases to amaze me and I would imagine many more captive council tax payers. I have read through your documentation and even you concede that drivers of diesel vehicles were given contradictory advice by the Labour government and as that advice regarding emissions has found to be incorrect you wish to punish those drivers who took it. This is a bit rich even coming from a bunch of councillors.</p> <p>I agree that measures should be taken to remedy this situation but your idea even though it is within the law and naturally adopted by other councils is nothing short of a legalised scam to raise money.</p> <p>I didn't see anything in the documentation to say how this money will be used in the Borough to improve air quality so perhaps you could enlighten me on this. If this is not the case perhaps you could tell me what you intend to use it for in case it is not the daylight robbery I am taking it for.</p> <p><u>2nd Representation</u></p> <p>Would you please acknowledge receipt of this email and let me have an answer to my query.</p>	Refer to points 1, 2 and 13 of officer's comments
46	<p>I am extremely concerned at this proposed levy, which is due to be in place from April this year - just two months away.</p> <p>1. As car owners we were advised, in the past, to purchase diesel cars as they were deemed better for the environment than petrol cars. That is why we originally bought such a car. I fully accept that this has been disproved now, and will certainly not be buying a diesel car in the future, but it is unfair to penalise those of us who bought diesel in good faith. We are more than happy to take your advice over what kind of petrol car is greenest when we come to look to purchase another car in the future - but that is not a financial possibility in the near future, and I imagine will not be for many of us diesel owners. Buying a car is a major expense which doesn't happen often for most of us.</p> <p>2. Whilst I never wanted a CPZ in my road for a number of reasons, not least that it means there is virtually nowhere to park in Merton now during the daytime, which makes visits to older and vulnerable members of our community much more difficult from carers and family members, I accept that they have become part of life. However, to single out those of us who are unable to park off road and already have the additional financial burden of paying for the privilege of parking somewhere in the vicinity of our homes (even if that vicinity is in the next road on occasions) to pay an extra amount is basically unfair. If a diesel tax is essential it should be payable by all those driving a diesel car and not just those who happen to be easy targets because you already have their details.</p> <p>It means that those who are able to afford larger houses with off street parking also benefit from not having to pay the levy - how can that be deemed fair. Added to this the sum of the levy is a considerably amount of money from year 1.</p> <p>3. The timescale. Two months notice from consultation to implementation is hardly fair or reasonable. By all means educate us over the importance of changing cars as soon as practicable, lobby the government to stop</p>	<p>Given the size and extent of the consultation area, it would have been unfeasible to do a newsletter drop to all properties within all CPZ zones. The statutory consultation was communicated from January 2017 by using the following methods :</p> <ul style="list-style-type: none"> <li>• On the council's website</li> <li>• Advertised in the Local Guardian and the London Gazette newspapers</li> <li>• Via leaflets and posters at libraries, leisure centres and at Merton Link</li> <li>• Via all ward councillors</li> <li>• Via all known resident and business associations</li> <li>• Via local radio station</li> <li>• Via social media including several press releases</li> </ul> <p>Also refer to points 1, 2, 5 &amp; 10 of</p>

	production of diesel cars - I will join the lobby, but please be fair on us citizens. I suspect that there are many of us who have not realised that this is even being discussed.	officer's comments
47	I am in favour of the diesel levy. What concerns me more are the awful polluting buses on Ridgeway and through the village. The 200 and the 93 are the worst culprits. What are your plans to deal with these? I try to avoid walking on the Ridgeway with my children it is so bad.	Refer to point 10 of officer's comments
48	I would completely accept that we need to improve London's air quality. However, it does seem completely unfair to introduce this in a borough such as Merton where only about half the borough has a CPZ. There is therefore no incentive for half the borough to reduce diesel car ownership. In somewhere like Islington, nearly all the borough has a CPZ! How much of your Lavender Fields ward has a CPZ?!	Refer to points 1 and 5 of officer's comments
49	I protest against the proposed diesel levy most strongly as it is unfair to those of us who bought diesel cars especially within the last couple of years. Modern diesels have particulate filters to remove unburned fuel and engines consequently work very cleanly. This is a very unfair tax and will affect many of the poorer families who have no way of parking their cars off road. THIS IS UNFAIRLY PUNISHING THOSE WHO BOUGHT DIESEL CARS on the governments recommendation	Refer to points 2 & 3 of officer's comments
50	<p>I wish to record my representation against the proposed diesel levy. As background, my previous car was petrol driven, three years old when I bought it, and it lasted me 21 years until 2010 before rust got the better of it. I consider I have done my bit for the environment by not changing cars too frequently.</p> <p>At that time, late 2010, the Government was putting out dire warnings on global warming due to increased carbon dioxide, and was coercing us to opt for diesel vehicles to reduce CO2 emissions. So, against my personal preference, I followed government advice and chose a diesel car as a replacement to "save the environment."</p> <p>Within six months of my buying it the Government changed its tune and started advising us to avoid diesel vehicles because of nitrogen dioxide exhaust emissions and particulates, and associated cancer risks. I felt conned by the Government.</p> <p>Now, Merton Council intends to impose this increased parking levy. I personally won't be affected because I have off-street parking space. However, if I didn't have such facilities, I would be incensed because this discrimination against diesel vehicles by local government would be adding insult to injury.</p> <p>We are talking about parking here. If the car is parked with the engine switched off it's not putting out any pollution, and it's not taking up any more road space than its petrol equivalent. Why not admit that this is just a fund raising exercise. If Merton Council is going to increase parking tax on diesels, it should do exactly the same for petrol vehicles.</p> <p>If Government really wants to encourage and incentivise diesel vehicle owners to consider adopting lower or zero emission technologies, it should introduce a scrappage scheme for diesels, along the lines of the scrappage scheme for elderly vehicles in 2009-2010.</p>	Refer to points 2 & 5 of officer's comments

<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 132</p>	<p>51 I have read your proposals for the introduction of a diesel levy on residents who own diesel cars and park on the roadside in Merton and wish to lodge an objection to the proposal.</p> <p>Whilst it is a very well-meaning initiative towards reducing air pollution, the introduction of the levy at short notice in April 2017 is unwelcome. It gives an impression of short term financial opportunism by the Council to raise extra cash. It is unjust because it gives residents insufficient time to research the various alternative types of vehicle available and raise the necessary finance. Does the Council intend of offer a scrappage scheme or finance to support this initiative?</p> <p>What is personal irritating is that we bought our diesel car based on the Government advice on the reduction of carbon emissions. Having contributed to the reduction of carbon emissions, the Council are now charging us a levy on the choice of vehicle we made on Government advice.</p> <p>I live in a terrace of 6 houses. Mine is the only property which has a front garden with a small pond, trees, bird feeders and nest boxes. My 5 neighbours have all paved over their gardens and use them for car parking. 4 of my neighbours are two car households, whilst the fifth has a single car parked on its hardstanding. So out of the 10 cars owned by my terrace I will be the only resident who pays the diesel levy because I park on the road. I do accept that some of my neighbours may apply for additional parking permits for visitors etc. However it strikes me that the Councils focus only on those residents who park on the road is discriminatory and as a result the levy will have a limited impact in reducing emissions.</p> <p>To be successful any emissions policy needs to have a broader and joined up scope. What action is the Council taking to ensure that it and all its contractors do not use diesel vehicles for Council duties? Ditto staff travelling on Council business and claiming mileage expenses?</p> <p>What is the Council doing to reduce bus and taxi emissions in the borough particularly near schools, nurseries and care homes for the elderly? Unless co-ordinated policies like these are in place the well-meaning initiative will be an ineffective drop in the air pollution ocean. Delaying introduction of the levy until April 2018 would give residents time to think about their choice of alternative vehicle and see how it fits in with Merton's wider approach to cutting air pollution and also that of the Mayor of London. At the moment introducing the levy in April 2017 comes across as unreasonable and short term financial opportunism. I urge the Council to think again on the timing of the introduction of the levy. In the meantime I am writing to my MP about the Council's proposals and its apparent financial opportunism. I will also contemplate greying my green garden - grey hard standing and two Merton Council wheelie bins – what a sad picture!</p>	<p>Refer to points 1, 5, 10, 11 &amp; 12 of officer's comments</p> <p>Given the size and extent of the consultation area, it would have been unfeasible to do a newsletter drop to all properties within all CPZ zones. The statutory consultation was communicated from January 2017 by using the following methods :</p> <ul style="list-style-type: none"> <li>• On the council's website</li> <li>• Advertised in the Local Guardian and the London Gazette newspapers</li> <li>• Via leaflets and posters at libraries, leisure centres and at Merton Link</li> <li>• Via all ward councillors</li> <li>• Via all known resident and business associations</li> <li>• Via local radio station</li> <li>• Via social media including several press releases</li> </ul>
<p>52</p>	<p>I wanted to let you know that I support your plan to introduce a levy on diesel vehicles. I had some other queries, Would it be possible to introduce something similar for highly polluting petrol vehicles? Could this be extended to council car parks using ANPR to identify diesel vehicles? What will the proceeds of the levy be spent on?</p>	<p>Refer to points 5, 10 &amp; 13 of officer's comments</p>



<p>53</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 133</p>	<p>I object on the following the basis:</p> <p>Overall everyone wants cleaner air. But this needs a central government approach that includes all vehicles. Is Merton air different from Wandsworth air? Well it's probably better run and cheaper...</p> <p>Specifically:</p> <ol style="list-style-type: none"> <li>1. Negative Economic Impact: Increasing the burden on Merton motorists is profoundly unfair and places a further costs on residents, the majority own diesel cars.</li> <li>2. Targets wrong polluters: the most polluting vehicles are vans, buses and lorries passing through the borough. How will they be taxed?</li> <li>3. Change in government advice: Motorist like me were until very recently advised by Government that diesel was good for lower CO2 emissions and economy. I bought my car on that advice. To now be penalised by local government as science has changed seems wrong.</li> <li>4. Undemocratic greenwash tax increase: a major increase in tax was not on the Labour manifesto, indeed it has said it will not increase taxes. Many people voted for labour on that basis. It is disappointing, but not surprising, that you are proposing a tax increase.</li> </ol> <p>I note that it is the type of objection rather than the volume of objections is being applied here. A very arbitrary and fundamentally undemocratic basis for consultation. I guess you rightly assume that people will not vote for tax increases.</p> <p>Overall another example of Council officials trying to scam more money out of hard working people, who will have no chance of avoiding the costs, and no money for a new car. Merton Council once again out of touch with the realities of its tax payers</p>	<p>Refer to points 1, 2, 5 &amp; 10 of officer's comments.</p>
<p>54</p>	<p>I write in response to the statutory consultation in respect of the proposed Diesel Levy. I am in support of measures to reduce harmful emissions, both in terms of greenhouse gases and localised air pollution. However, I object to this scheme for the following reasons:</p> <ol style="list-style-type: none"> <li>1) It is completely contrary to the messages and incentives from central government which encourage diesel cars vs petrol because of lower C02 emissions. Many people, myself included, will have taken this into account when purchasing their vehicle and therefor it is completely unfair, at short notice, to reverse these incentives in this way. Taking into account VED and this levy, I will now be paying more than I was for my old, inefficient petrol vehicle.</li> <li>2) It takes no account of the different classes of diesel vehicles. Surely the scheme should be based on measures such as the European emissions standards – my diesel car meets the latest Euro 6 standards, and is fitted with adblue technology. I believe it is therefore significantly more environmentally friendly, both in terms of C02 and nitrogen oxides, than most older petrol vehicles.</li> <li>3) It is not vehicles per se but use of vehicles that creates air pollution. As a low mileage driver, I am already</li> </ol>	<p>Refer to points 1, 2, 3, 5 &amp; 7 of officer's comments</p>

	<p>disproportionately penalised via VED versus high mileage drivers – this will only add to this. I believe strongly that all environmental taxes on vehicles should be collected via fuel levies, not ownership levies.</p> <p>4) It is completely inexplicable why such a levy should only apply to those living in a CPZ. If this is a genuine issue, it should be applied to all diesel vehicles registered in the borough.</p> <p>Accepting that the council as a local government body may not have the means to address point 3, I would propose a much fairer and more effective scheme would exclude diesel vehicles which meet the latest Euro 6 emission standard and / or are fitted with adblue technology, which breaks down nitrous oxides into harmless nitrogen and oxygen.</p> <p>The scheme should also take account of the fact that most people operate on a 3-4 year replacement cycle for their vehicles therefore should not be implemented at such short notice. The scheme in its present form appear to be a lazy effort by the council to raise additional revenue, attacking only ‘low hanging fruit’ rather than something that will drive change and impact all residents of the borough in a fair way.</p>	
<p>55</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 134</p>	<p>Thanks for publishing your consultation on the proposed diesel levy. I’m writing to register my opposition to the proposal, on the basis that it seems an unnecessarily blunt instrument that will penalise local residents who don’t have the financial means to replace their vehicles at short notice and that won’t necessarily achieve the desired outcome of reducing harmful emissions (which is certainly a laudable aim that I share). I would much rather see a sliding scale for vehicles on the basis of their actual emissions, rather than lumping together all diesels, including the latest low-emissions models, as “bad”, and all petrol engines, including old, large, more-polluting models as “good”.</p> <p>Many people chose diesel cars on the basis of their significantly lower CO2 emissions compared to petrol alternatives, and this continues to be promoted through significantly lower rates of vehicle tax – the increased vehicle tax of switching to a petrol alternative would be roughly equivalent to the proposed hike in parking rates for a diesel, and plug-in electric vehicles are not an option for many who live on roads with no off-street parking given the relative lack of charging points locally.</p>	<p>Refer to points 1,2 &amp; 3 of officer’s comments.</p>
<p>56</p>	<p>I am writing to you in relation to the proposed ES/DIESELLEVY. Your statement of reason states: The proposals will encourage and incentivise diesel vehicle owners to consider adopting lower or zero emission technologies.</p> <p>I changed from a petrol Renault Clio 1.2 to a Diesel Renault Clio 1.5 on the basis I had been led to believe they were better for the environment as the CO2 emissions were so low, the Government Road Tax was very cheap and the fuel efficiencies were very good. I thought that by managing to do more miles to the gallon would mean less emissions.</p> <p>To now be told I am wrong after I paid an extra £1500 for a diesel model and that I will now start to be financially penalised in frustrating. Luckily, I do have off street parking at the moment, however, I question the fact that you think that adding a levy of £90 increasing to £150 will incentivise a driver to change their car.</p>	<p>Refer to points 1,2, 5, 11, 12 &amp; 13 of officers comments</p>

	<p>I strongly suspect with the anti diesel rhetoric in the press and by councils at the moment that the residual value in my existing car will now be reduced which will make it harder to fund the purchase of another car. Also replacing my car will cost significantly more than £90-£150. Surely a better way to work forward will be to work with the car industry to reduce the production of diesel cars and work towards making greener vehicles more affordable. I have looked at a hybrid car but can not afford to buy one.</p> <p>What affirmative action is Merton Council taking to ensure the reduction in diesel vehicles used directly by the council or by their service providers? How will the additional levy be spent? Will it be used on green projects or will it just be absorbed into general income? Are senior staff at the council leading by example and adopting lower or zero emission technologies?</p> <p>To summarise I strongly object to this additional charge and under no circumstance do I think it encourages or incentivises drivers to change car.</p>	
<p>57</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 135</p>	<p>The planned introduction of the diesel levy on parking permits states that its intention is to:</p> <p>"...encourage and incentivise diesel vehicle owners to consider adopting lower or zero emission technologies. This will lead to reduced harmful emissions, particularly nitrogen dioxide and particulate matter within the borough and thereby mitigate their adverse impact on the health of residents"</p> <p>I completely agree that high emission vehicles are damaging to health and the environment and that action is required to reduce emissions across the board, however I strongly object to the approach being taken by the council on this matter for the following reasons:</p> <ul style="list-style-type: none"> <li>- This levy penalises all diesel car owners without reference to the actual emissions that each car generates. There are many diesel cars (mine included) that use Urea (AdBlue) to capture the nitrogen oxide / nitrogen dioxide and greatly reduce emissions. The emissions of these diesel cars are therefore often much lower than petrol equivalent car.</li> <li>- The levy only penalises those residents who require a parking permit and not those with access to off-street parking. This in variably penalises those who live in smaller houses or flats.</li> <li>- The levy penalises diesel car ownership and not the actual process of driving a car which is what produces the emissions. A car owner who drivers little is penalised as much as an owner who drives extensively.</li> <li>- The decision to impose the levy has not been done with sufficient notice to allow car owners to plan a change of vehicle. With less than 3 months between the announcement and planned introduction of the levy residents cannot be expected to purchase new vehicles to avoid the levy.</li> <li>- A policy to reduce the number of diesel vehicles should be a London-wide policy and part of a much wider strategy on air pollution and low emissions vehicles, not applied in isolation by some boroughs</li> <li>- At the proposed level the levy looks like a revenue generation process rather than an instrument to change behaviour and reduce emissions (levy costs vary considerably between boroughs, £90 in Merton, £10 in Camden,</li> </ul>	<p>Refer to points 1,3,4,5 &amp; 6 of officer's comments</p>

	<p>£19 in Kensington &amp; Chelsea).</p> <p>The approach being taken by the council here is a very blunt instrument that arbitrarily penalises a segment of the Merton population. A much better and fairer approach to this type of issue would be to adopt a progressive levy based on car emissions across all engine types (much like the road tax levy). This would be easily enacted as all residents requesting a parking permit are required to provide the vehicle registration document that contains emission level details.</p> <p>Finally, I am very angry that the council is trying to enforce this levy without sufficient notice or proper consultation. This has been poorly thought through and is being arbitrarily applied.</p> <p>I am aware that public bodies, such as the council, must follow certain procedures in their decision making process. Please forward me any information relevant to this case.</p> <p>Please keep me informed about any developments on this subject.</p>	
58	<p>Your diesel levy leaflet invites residents to give their views. Here are mine:</p> <p>Like most people I am concerned to protect and enhance the environment and do my best to contribute personally. Many residents including me bought their diesel car when we were encouraged by Government to do so through tax breaks etc., diesels then being considered cleaner and greener than petrol vehicles. Even now, the Government road tax on cars depends on CO2 emissions only, and does not penalise diesel.</p> <p>However, it seems the thinking has recently changed. You now want to penalise drivers for doing something that until recently was encouraged because it was “green”. This seems unfair.</p> <p>Your proposal would be ineffective because it penalises the wrong thing; parking not driving. Cars do not pollute by being parked, only by being driven. As far as I can see, this levy would not even apply to parking meter parking or Council car parks. Cars parked in non-CPZ's or on private land cause the same pollution as those in a CPZ. It is hard to understand how this levy can be considered equitable or effective.</p> <p>It would be unfair, being a binary yes / no levy on diesel, irrespective on engine size, size and age of car and mileage driven. I wonder what owners of two vehicles, one diesel one petrol, and one off-street parking place will do. By choosing to park the diesel off the street will they be contributing to easing pollution?</p>	Refer to points 2,4,5,10 & 12 of officer's comments
	<p>The levy would not affect large commercial vans, trucks, coaches and busses, which are largely parked off street. These vehicles are responsible for the vast bulk of harmful emissions. I note that the Council and its contractors are major diesel fleet operators. What is planned here?</p> <p>In summary would be taxing the wrong thing by introducing a discriminatory diesel parking levy, which would be unfair and likely to be ineffective.</p> <p>Here are some constructive alternative suggestions:</p>	The Council promotes sustainable modes of transport including cycling. Merton works in partnership with TfL to improve cycle infrastructure including cycle lanes, shared surface, cycle parking etc.

	<ul style="list-style-type: none"> <li>• raise the levy on mileage and emissions, or at least a toll for entering polluted parts of the Borough, not on parking</li> <li>• introduce a scrappage programme to encourage replacing diesels by low-polluting vehicles</li> <li>• encourage cycling by making it easier and safer</li> </ul> <p>I contend that your whole concept is inequitable and, in my opinion, unlikely to be affective. I urge you to drop the plan</p>	
59	<p>I am writing having heard about the proposal to penalise residents for owning diesel cars.</p> <p>Whilst the aim of improving air quality in the borough is laudable, approaching it in this way would appear to be the council picking an easy target rather than the main cause of the problem.</p> <p>As we are all well aware, the Wimbledon end of the borough is a very heavily used cut through by commuter traffic, a significant proportion of which will be diesel. Add to this the busses that travel throughout the borough and the numerous lorries and vans delivering to the local area and I believe that you will find where the majority of the diesel pollution comes from. Finally, I would guess that in the Wimbledon half of the borough (which has the many more CPZ's) typically the cars are more modern and less polluting; having DPFs, urea injection and other innovations.</p> <p>I would ask you to reconsider this proposal and, instead, concentrate on reducing the volume of traffic through the borough (especially that generated by people just transiting the area) and in identifying the polluting vehicles and either taxing them or removing them from the roads.</p>	Refer to points 1,3,5 & 10 of officer's comments
60	<p>Yet another 2014 election promise broken by our Labour Council. Please explain</p> <ol style="list-style-type: none"> <li>why is the tax considerably more expensive than in other boroughs?</li> <li>why does it only apply to diesel vehicles in CPZ zones and not to all diesel vehicles if the idea is to reduce pollution from such vehicles?</li> <li>why did Merton ignore the advice of its own consultants in not consulting with residents on the impact of such a high levy, with it being argued that residents could seek to avoid it by concreting over their front gardens to create more off street parking. Is Merton Council out of its mind in supporting yet more people concrete over their gardens to create off-street parking and add to climate change twice over?</li> <li>what evidence is there to show the tax will improve the quality of the air?</li> <li>what guarantee can Merton give that the money raised will be used for environmental purposes and improve air quality and not to boost its own coffers?</li> </ol> <p>It smacks of a desperate money grabbing exercise the only purpose of which is to squeeze yet more money out of ordinary residents for the council to have more to squander. We therefore object to this diesel levy in the strongest possible terms.</p>	<p>Refer to points 4,5,6 &amp; 13 of officer's comments</p> <p>The consultant's advice for further resident engagement was carefully considered. It was felt that this would be both counterproductive and would delay in taking urgent the urgent action necessary.</p>

61	<p>I wish to strongly object to this unfair and punitive money making charge on the following grounds:</p> <ol style="list-style-type: none"> <li>1. This levy is not a blanket charge for all diesel vehicles registered in Merton. It only applies to those diesel vehicles who are unfortunate enough to have a CPZ. Those who have off street parking and those who do not have a CPZ and own a diesel car will not be charged anything.</li> <li>2. Anyone living outside the borough who owns a diesel car will still use Merton's roads and cause pollution. Most lorries are diesel and they not the cars are the major output of diesel in Merton, they will not be charged.</li> <li>3. Those on low incomes will be disproportionately affected by such a high charge (£150) and they are the least able to afford the change to a petrol car.</li> <li>4. The new diesel cars are much cleaner than the old engines and this is a blanket charge taking no account of the new cleaner diesel engines.</li> <li>5. I am afraid, as usual, this is purely a money making scheme for Merton picking on a small segment of the community.</li> </ol>	<p>Refer to points 3,5,10 &amp; 13 of officer's comments</p> <p>There is no evidence that this levy will disproportionately impact on those on a low income.</p>
62	<p>I am writing to protest the council's proposed diesel levy for CPZ resident permits. We bought our car in 2012 and although we chose to buy a car with a diesel engine, we made sure we bought one which included a number of BlueMotion energy-saving technologies which cut fuel consumption and reduce harmful emissions. We took this very seriously and now feel we are being penalised for making a very responsible decision about a subject that both my husband and I feel very strongly about. The levy is disproportionately expensive especially when compared to other London boroughs where traffic congestion is more of a concern than it is in Merton, for example in Camden it is just £10 and in Kensington and Chelsea it is £19. The charge, at £90 in the first year, represents a 238% increase in parking permits for those with diesel cars with just a five-month notice period, which is totally unacceptable.</p> <p>We care about the environment and are happy that the council is trying to improve the air quality in the borough but this smacks of an easy fundraising scheme. Will the funds collected under this levy truly be ring-fenced to provide better, environmentally friendly transport options?</p> <p>This scheme penalises those in the borough who bought their supposedly more environmentally friendly cars, like us, in good faith. We cannot afford to change our car so are now forced to pay this disproportionate charge, which will increase from £65 a year to £215 in just two years, which is outrageous. This charge is both disproportionate and the timing totally unfair to Merton residents</p>	<p>Refer to points 2,3,6 &amp; 13 of officer's comments</p>
63	<p>I object to the proposal by The London Borough of Merton announced in the 13 January press release to introduce a new diesel levy in April 2017.</p> <p>This proposal is said to be in response to a national health emergency and the Mayor of London's pledge to cut air pollution in the capital accept there is a need to improve the quality of the air in all our cities throughout the world. However, I oppose strongly the piecemeal approach being suggested, the ignoring of open communication to residents requested by members of the Sustainable Communities Overview and Scrutiny Panel and turning this global environmental matter into a political issue so that car owning residents trapped in CPZs are treated by Merton as "cash cows."</p>	<p>Given the size and extent of the consultation area, it would have been unfeasible to do a newsletter drop to all properties within all CPZ zones. The statutory consultation was communicated from January 2017 by using the following methods :</p>

My objections are set out below.

1. In section 2.11 of the paper “The introduction of a diesel levy for all types of resident and business parking permits” discussed by the Scrutiny panel on the 7 November 2016, the statement is made “...The Council's 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....” But Merton is not an island. The Borough is surrounded by the London Boroughs of Kingston, Wandsworth, Lambeth and Sutton and intersected by several major trunk roads which bring commercial and private vehicles into the area from all over Europe, other parts of London and the country.

The composition of the atmosphere in Merton does not remain fixed as the proposal assumes. The atmosphere is changing constantly with the weather systems. Therefore any pollution at a particular location in Merton will be affected by the movement of vehicles, industrial processes.....anywhere, and not just in this Borough. There is very little value in trying to clean up atmosphere in Merton if the neighbouring Boroughs are continuing to pollute the environment so their dirty air continues to move through this area.

If there is an intention to seek to reduce the atmospheric pollution in Merton, then it should be done as part of a scheme for London as a whole and not by the piecemeal approach proposed.

2. I object to the speed with which this proposal is being rushed through. The announcement of this proposal by Merton was made on the 13 January 2017, requesting any comments by the 3 February 2017, before introduction in April 2017.

This timetable is in conflict with the reported views of the majority of the Scrutiny Panel at their recent meetings.

The Panel minutes of the meeting of the 7 September 2016 and the Emissions Levy Paper produced for the meeting on the 7 November 2016 state clearly that “....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....”

This communication does not appear to have been carried out. Instead the residents in the CPZ areas affected have been ignored while Merton Council attempts to steamroller through its short sighted proposal which must be stopped until everyone affected has been notified directly, their views collected and an open public discussion conducted and a way forward agreed, rather than allowing them to be treated as “cash cows.” This is for the benefit of Merton and London as a whole and not one particular area.

3. This proposal by Merton Council has turned the issue of local atmospheric pollution from an environmental problem into a political matter. Section 6 of the minutes of the Scrutiny Panel held on the 7 September states “....Currently there are more Controlled Parking Zones in the west of the borough but that demand for these is growing in the east. This will mean the impact of this policy will be uneven initially but will become more equal over

- On the council’s website
- Advertised in the Local Guardian and the London Gazette newspapers
- Via leaflets and posters at libraries, leisure centres and at Merton Link
- Via all ward councillors
- Via all known resident and business associations
- Via local radio station
- Via social media including several press releases

The Council is not obliged to undertake any informal consultation. However, the Council has undertaken a statutory consultation for the introduction of the proposed levy and the fact that representations have been received including this one, it can be considered that the Council has succeeded in its consultation and therefore consulted with its residents.

Also refer to points 1,5, & 10 of officer’s comments

	<p>time.....” But the Wards in the west of Merton are Conservative while those in the east are mainly Labour controlled. Furthermore the phrase “... will become equal over time...” is meaningless and simply illustrates the political nature of the proposed action by Merton Council.</p> <p>Merton Council are attempting to penalise the residents of Merton, failing to communicate with residents in a democratic manner. Most CPZ bound residents of Merton do not know this proposal exists. This issue should be resolved for London as a whole and NOT as a piecemeal approach by individual Boroughs.</p>	
64	Great idea! I hope you implement it. Pump the money raised from it into social care!	Noted
65	<p>As a resident in Merton I am writing to you as Leader of the Council to object to the proposed discriminatory rise in parking permits for owners of Diesel cars. This strikes me as extremely biased and unfair and smells rather like a cynical way to raise revenues in the guise of a green agenda. Clearly pollution must be reduced. And so surely all pollution sources, petrol and diesel should be equally targeted.</p> <p>Any rise in charges/levies/permits etc should apply equally to all petrol and diesel users. To single out diesel is definitely discriminatory and unfair. Especially since most diesel owners bought their vehicles with the prevailing understanding (now found to be untrue) that they were less polluting than petrol. Why should they now be disproportionately penalised?</p> <p>If you do decide to go ahead with this measure, then surely it should only apply to vehicles registered after the date of the legislation as these owners would be buying diesel vehicles in full knowledge of the problems and associated penalties.</p>	Refer to points 1,2,3 & 4 of officer's comments
66	<p>We are the Charity and local amenity society for Merton Park, and we discussed the proposed diesel levy at our Committee Meeting last night. We would like to put it on record that as a Committee we wholeheartedly support the proposed levy and look forward to its early implementation.</p> <p>We consider the evidence is overwhelming that diesel particulates cause serious health problems. We hope the levy will help to make people aware of the damage choice of a diesel vehicle can do and that as motorists replace their vehicles, they will consider alternative fuels.</p>	Noted
67	<p>I am emailing with regard to the proposed levy on all diesel vehicles registered in CPZs in Merton, and I am against such a proposal for the following reasons</p> <ol style="list-style-type: none"> <li>1) Insufficient notice given to those effected, to enable car owners to pre-plan whether to have a petrol or diesel vehicle.</li> <li>2) In essence, the proposed levy penalises the poorer in the community, as those who have off street parking, private driveways etc., which tend to be at higher valued properties, will avoid such proposed levy.</li> <li>3) Has no consideration as to the actual annual mileage driven by the vehicle involved, and is therefore grossly</li> </ol>	<p>Refer to points 1,5 &amp; 6 of officer's comments</p> <p>It is not possible at this time to introduce a mileage based parking charge</p>



	<p>unfair.</p> <p>4) The level of the proposed levy is substantially higher than that in other London boroughs.</p>	
<p>68</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 141</p>	<p>I am writing to express my ardent disapproval of Merton's Labour Councillors' decision to vote through an increase to the cost of parking permits for owners of diesel vehicles. The reasons for my dissent are as follows:</p> <ul style="list-style-type: none"> <li>- The unjustifiable increase to the levy: how can Merton Council rationalise an increase which at its height in 2019/20 (£150) will be substantially higher than other levys in London (15x that of Camden, more than 7x that of Kensington &amp; Chelsea etc.)?</li> </ul> <p>Is Merton's air pollution that much worse to warrant such an excessive penalty on the borough's diesel vehicle owners? If so, please provide the evidence. The unparalleled nature of Merton's increase suggests that the decision is more about raising funds (perhaps to fill a budget deficit??) than abating any environmental concerns. By 2019/20, the levy will generate almost £1 million (£861,150) and hence almost 4x the figure (£250,000) first muted in the summer of last year. (Not to mention Labour's promise in its 2014 manifesto to "freeze the cost of resident and visitor parking permits for another 4 years").</p> <ul style="list-style-type: none"> <li>- Its environmental message is inconsistent: whilst the levy has been advertised as an environmental and anti-pollution measure (Statement of Reasons), it will have the opposite effect of encouraging even more residents to concrete over their front gardens in order to create more off-street parking. Already half of London's front gardens are completely paved over (RHS) and we know that this has caused not only a loss of greenery and plants in urban environments but also a substantially increased risk of flooding.</li> <li>- It is socially regressive: the levy will place a disproportionately higher burden on lower-income residents since it unfairly penalises those diesel vehicle owners who do not have garages or off-road parking (typically those living in flats and smaller houses) and who cannot afford to update their vehicles</li> </ul> <p>For the above reasons, I urge Merton's Labour Councillors' to reconsider the magnitude of the levy and, in doing so, demonstrate that otherwise worthy environmental measures can, and should, be taken for their own sake and not as covert means to plug a budget gap.</p>	<p>Refer to points 4,5,6 &amp; 13 of officer's comments</p> <p>There is no evidence that this levy will disproportionately impact on those on a low income</p>
<p>69</p>	<p>I write to object to the arbitrary decision to penalise without due notice and on a somewhat random basis, the owners of diesel cars living in CPZ areas in the Borough, mainly in the West of Merton.</p> <p>Citizens of this country were encouraged to buy diesel cars in past years as Westminster led us to believe that they were better for the environment. Indeed the proportion of diesel cars sold in the UK has exceeded petrol engined cars for the past few years. We bought our first diesel car only 5 years ago in line with this guidance. Now, one suspect at least partly because of the faking of emission tests by a large number of car manufacturers, we are led to believe that diesel cars are no longer good for the environment.</p> <p>We all want to take care of the environment but the proposed levy on residents living in Merton's CPZ's seems to</p>	<p>Refer to points 1,2,3,5 &amp; 10 of officer's comments</p> <p>It is not always possible to determine if a vehicle is diesel. Administering a charge at parking meters is not physically possible. However, the approach of charging diesel vehicles when parked at a meter could also be</p>

	<p>hardly to address the overall issue of pollution in Inner and Outer London. It looks to the electorate much more like a fund-raising exercise.</p> <p>Why not charge anyone parking a diesel car on a meter in Merton extra as they are proposing in Westminster? This would raise the revenue the Council needs and should deter the driving of diesel cars in and out of Merton, which is presumably a leading contributor to local pollution, and not static parked cars belonging to the residents of the CPZ's.</p>	<p>considered as part of the 2 year review and full emissions based permit system</p>
70	<p>I understand there are plans to levy a charge on diesel vehicles in the borough that have Merton parking permits. I have not received official notice of this (just word of mouth), as a permit holder - are you planning to go to public consultation on this matter?</p> <p>I am all in favour of discouraging the use of diesel engines, we have been misled by government into thinking they were less polluting, but I think it is very unfair and unjust of Merton to charge permit holders this levy, without charging all other owners of diesel vehicles in Merton. I certainly will be switching away from diesel with my next car purchase but not because you might be charging a levy.</p> <p>Clearly the difficulty is identifying such owners, you only know who the permit holders are, unless you are given access to the full DVLA records - unlikely I would have thought.</p> <p>So this is inherently unfair - my neighbour who drives a diesel car but has no permit will not be charged as he parks off road during controlled hours - but is often on-street parking during evenings and Sundays (and driving in the borough naturally). He won't be charged.</p> <p>It is not the parking that causes the pollution but the driving... and you don't appear to be planning to levy a higher rate to those vehicles which are more polluting than smaller cars with lower emission rates. Another unfairness.</p> <p>I hope you will re-consider this matter - perhaps suggest to the Mayor of London that there is a capital wide levy on all diesel vehicles, on a sliding scale, that would be much fairer.</p>	<p>Given the size and extent of the consultation area, it would have been unfeasible to do a newsletter drop to all properties within all CPZ zones. The statutory consultation was communicated from January 2017 by using the following methods :</p> <ul style="list-style-type: none"> <li>• On the council's website</li> <li>• Advertised in the Local Guardian and the London Gazette newspapers</li> <li>• Via leaflets and posters at libraries, leisure centres and at Merton Link</li> <li>• Via all ward councillors</li> <li>• Via all known resident and business associations</li> <li>• Via local radio station</li> <li>• Via social media including several press releases</li> </ul> <p>Also refer to points 2,3 &amp; 5 of officer's comments</p>
71	<p>Whilst I applaud your aim of reducing emissions, but your proposal to raise a high levy is unfair and short sighted. It penalises vehicle owners whose properties are too small to have off street parking and will encourage people with green front gardens to pave them over</p>	<p>Refer to points of 1 &amp; 5 of officer's comments</p>
72	<p>This is an unfair tax on owners of diesel vehicles and does not take into account the fact that in the not so distant past one was encouraged to purchase diesel vehicles. Also it does not take into account that not everyone is lucky</p>	<p>Refer to points of 2 &amp; 5 of officer's</p>

	enough to have access to off street parking. I personally drive a petrol vehicle	comments
73	<p>I wish to strongly object to the proposed diesel levy proposed by Merton Council. The reasons for this objection are:</p> <ol style="list-style-type: none"> <li>1. I was encouraged to buy a diesel car through government encouragement (car tax, fuel tax etc) as it was then seen to be an environmental responsible choice. Why should I be penalised for following that encouragement and advice by the UK government.</li> <li>2. When parking permit consultations occurred we were informed by Merton Council that the costs would be reasonable and were to cover administration costs, it was not positioned as a tax or levy. It is clear from the annual accounts of Merton Council that this is now a revenue raising exercise as the revenue is greater than the costs to administer. An additional levy would only reinforce this position.</li> <li>3. The parking permit was not introduced as a method of influencing travel choices but as a cost to help manage the demand for parking for residents. To change the rationale of the resident parking aim without consultation is undemocratic.</li> <li>4. Any substantial changes to the rationale and pricing levels of residents parking should require a re-consultation exercise with the residents as to whether they still want CPZs.</li> <li>5. The proposed charging levels for diesel vehicles are extremely high and are phased in over a very short time period which are not in keeping with the long term purchasing asset of a car. Most people are not able to change their vehicles on a frequent basis to suit such short term changes that the Council is proposing to make.</li> <li>6. There may well be further changes made in two years time post the review, as it is unclear whether petrol cars will be impacted and will face an additional levy as well. Therefore any decision about which type of car to purchase instead of diesel is impossible to make with this complete lack of predictability and transparency.</li> <li>7. This will impact the value of an important asset for residents. This needs to be compensated by the Council.</li> <li>8. These proposals were not made visible at either the time of the Council elections or at the time of the CPZ extension into SW20 and therefore do not reflect the views of the residents.</li> </ol>	<p>Refer to points 1,2 &amp; 4 of officers comments</p> <p>Given the size and extent of the consultation area, it would have been unfeasible to do a newsletter drop to all properties within all CPZ zones. The statutory consultation was communicated from January 2017 by using the following methods :</p> <ul style="list-style-type: none"> <li>• On the council's website</li> <li>• Advertised in the Local Guardian and the London Gazette newspapers</li> <li>• Via leaflets and posters at libraries, leisure centres and at Merton Link</li> <li>• Via all ward councillors</li> <li>• Via all known resident and business associations</li> <li>• Via local radio station</li> <li>• Via social media including several press releases</li> </ul>
74	<p>I am writing to you to object strongly about your plans to impose a levy on owners of diesel cars wishing to park in one of the CPZs. This levy is wholly unfair for these reasons:</p> <ol style="list-style-type: none"> <li>1) The levy is discriminatory and imposes no tax on people who are able to park on their own property or who live in an area without a CPZ</li> <li>2) Many of us were encouraged to purchase our diesel cars by the Government who at the time encouraged us by telling us diesel was more environmentally friendly. How is it fair that we will now be fined?</li> <li>3) When many of us were consulted on Controlled Parking, there was never any indication that there could be the possibility of charging us for anything other than parking</li> </ol>	<p>Refer to points 2 &amp; 5 of officer's comments</p>

	Now that we have scientific evidence of the harm caused by diesel omissions, it is right that such vehicles are phased out. (Next time we need to purchase a car it will be, for those reasons, a petrol car.) The way forward is to levy new diesel vehicles brought on the market, or for the Government to make some financial assistance to those of us it wrongly encouraged to purchase these cars in the first place so that we can make the change to a petrol car.	
75	I just want to formally register my disappointment in the unfair new diesel tax for parking permits in merton. No one let me know about the poor diesel emissions issues when I bought the car. Indeed it was seen as efficient at the time. This tax should not apply to existing owners only to buyers of new cars.	Refer to point 2 of officer's comments
76	I wish to object to the proposed scheme, it is well intentioned but will not achieve its aims and will punish Merton residents and businesses. Many diesel owners bought these vehicles years ago when the widely held belief was that diesel cars were more efficient and therefore good for the environment, you cannot impose such a scheme at short notice, Merton has to give at least three years notice of intent. The biggest polluting diesel vehicles in the Borough are those of Black Cabs and delivery vehicles, they would be immune from your proposals, which is ridiculous.	Refer to points 1,2 & 10 of officer's comments
77	While I welcome the idea of lower pollution in Merton. I feel this proposal will NOT address the real problem. All it will do is force diesels off the road and on to hard-standing, garages and alleyways that don't need parking permits. If this is new policy is enforced, I expect to see more hard-standing instead of front gardens and more diesel cars and large white vans parked on them, which will spoil the look of the Merton Park area and damage the grass verge. Your policy will NOT address or stop the long-term problem of people that run their car and van engines, (petrol and diesel) with no-one in the cars and vans (both on the road and on hard-standing) or for the people that stop driving to check and use their phones, while leaving their engines running. What is needed is a proactive policy to stop unnecessary, anti-social parked engine idling and encourage social responsibility for lower pollution and improved air quality.	Refer to points 4,5 & 12 of officer's comments
78	There can be no question that the reduction of diesel particulates in our atmosphere to improve public health is the right long-term objective. In the short-term, however, it is important that if the costs of the measures implemented are to be borne by rate-paying diesel car owners alone they are as fair as possible to that specific category which was, after all, historically encouraged to purchase diesel cars by central government. We believe the current proposal is flawed for the following reasons:  1. All diesel-powered cars pollute. Only levying the charge upon the holder of a resident's parking permit is completely unfair as a neighbour parking a diesel-powered car off-road (without the need for a permit) escapes scott free and has no incentive to change to petrol or electric propulsion.  2. All diesel-powered cars pollute regardless of their registered location. Levying the levy solely upon those areas of the borough subject to CPZs means large numbers of residents, again, for no good reason, escape scott free.	Refer to points 5 7 10 of officer's comments  There is no legal mechanism to include all diesel-powered vehicle registered to owners throughout Merton

	<p>3. Commercial vehicles of all types will be major contributors to pollution and untold numbers of them based outside Merton pass through the borough every day: they will not be levied.</p> <p>We fully understand the Council feels a responsibility to act: but this is a serious issue and needs more careful thought. Accepting the fact the Council couldn't afford the technology required to levy a charge on vehicles transiting through the borough it is axiomatic the heavy burden must fall upon residents - many of whom could be hard-pressed financially. Our conclusion is the proposal has been rushed and should be sent back to the drawing-board to achieve a much more even-handed, fairer result.</p> <p>Specifically: The introduction of a levy on all diesel-powered vehicles registered to owners throughout Merton: to be introduced on a sliding-scale over a period of three years with an associated resident's parking permit concession for electrically-powered vehicles. We strongly oppose the current proposal.</p>	
79	<p>I write in response to the proposed Diesel Levy charge in Merton as proposed by Merton Council. I strongly oppose this idea. The government encouraged citizens to buy low emitting CO2 diesel vehicles previously, which is why there are so many on the roads...With public transport fares are still rising, my diesel car is the only realistic choice for a young family</p>	<p>Refer to point 2 of officer's comments</p>
80	<p>1. This levy will not affect business's and residents who have garages or off-road parking, although their cars are equally responsible for diesel pollution. Residents with garages and off road parking are generally wealthier, probably driving larger (and therefore less fuel efficient) vehicles. This levy will hurt poorer residents more.</p> <p>2. A great many older diesel vehicles were bought when government was encouraging diesel vehicles as being more efficient and having a less damaging effect on global warming. Apparently this doesn't matter any more, but it is unfair to motorists who bought their diesel cars for ethical reasons. I therefore think that diesel cars more than, say, 6 years old, should be exempt.</p>	<p>Refer to points 2 &amp; 5 of officer's comments</p> <p>There is no evidence that this levy will disproportionately impact poorer residents</p>
81	<p>I am writing to object the planning changes on diesel car parking permit levy. Although I am concerning the air quality within Merton, but I am not completely agreed with the methods introduced because of the following reasons. Firstly, I am living at Braeside Avenue where 99% of the residents are driving a diesel car and have to use on-street parking. The residents are using these cars mainly during the weekend. Hence, I am not convinced that we are contributing much to the excessive air pollution, but if the new policy is in place, we all have to pay for extra just for parking the car on street for 5 days a week.</p> <p>Secondly, this change will have no impact on most of the people having a drive way. They will still drive their cars and contributing nothing to the claimed disproportionally air pollution.</p> <p>Thirdly, the price is much more comparing to other boroughs and is unfair to local residents. Local resident should have a discount comparing to business parking permit holders because commercial establishment should contribute more financially.</p> <p>Last but the least, I didn't see too much charging post around Braeside Avenue and it's impossible for residents</p>	<p>The diesel levy is set at a level along with a phased increase over 3 years to bring about change in the type of vehicle that permits holders drive. Business and Trade permits are charged in excess of 10 times the rate of the Residents Permits and therefore they do contribute financially more.</p> <p>The roll-out of electric charging points across the borough is currently underway</p>

	<p>using on-street parking space to install charging post by themselves or run a cable from their home.</p> <p>Based on the above concerns, I plead the council to reconsider the decision and how it should be exercised.</p>	<p>Also refer to points 5 &amp; 6 of officer's comments</p>
<p>82</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 146</p>	<p><b>OBJECTION TO PROPOSED DIESEL LEVY FOR CPZ PERMIT HOLDERS - Summary</b></p> <ul style="list-style-type: none"> <li>- Only 4,000 – 6,500 diesel vehicles have borough parking permits; a very small proportion of those diesel vehicles actually owned by borough residents</li> <li>- Unfair to penalise such a small proportion of borough resident-parked cars</li> <li>- Studies on which the policy has been based cannot be considered to be valid, as they only look at resident parking permit vehicles, and not those actually driving within the borough</li> <li>- Proposed policy takes no account of the diesel cars/taxis/lorries etc. that actually drive within the borough and pollute daily – assume many tens or probably hundreds of thousands across Merton</li> <li>- Proposed policy takes no account of diesel resident-permit cars' mileage, nor their driving habits and routes (i.e. where there journeys are made, within or outside the Borough)</li> <li>- Any sensible and effective policy should correctly target the real polluters – i.e. the diesel vehicles that are driven within the borough, not those that are merely forced to have a resident's parking permit</li> <li>- Surcharging multiple vehicles per household is also unfair, as many would not be being driven simultaneously – and especially not within the borough</li> </ul> <p>I am writing to object strongly to the proposed introduction of a parking permit levy to those residents who are were encouraged by relatively recent government policy to purchase more efficient diesel cars, and who are also unable to park off-road and therefore forced to purchase a resident's parking permit.</p> <p>This proposed policy is one of the bluntest instruments that could be wielded to resolve what I would agree though is a very important issue.</p> <p>The two documents linked above – which I believe are the studies that you undertook – appear to make absolutely no reference whatsoever to the actual numbers of diesel cars, lorries, taxis, vans and HGV's that are the real polluting vehicles that drive through this borough on a daily basis – of which there must be tens of thousands daily, and which are therefore those that are polluting the borough (i.e. Not just those diesel vehicles that happen to have a CPZ permit...). For any professional research study to be considered valid, it MUST surely consider the actual polluters, as it is surely these vehicles that are responsible for the emissions into the local environment – and NOT those that just happen to have a resident's parking permit, merely because they happen to have a diesel vehicle and cannot park off-road.</p> <p>According to your study documents there are only between 4,000 and 6,500 (depending on which document is correct) diesel vehicle permit holders within the borough of Merton. Those diesel cars that have resident's permits</p>	<p>Refer to points 1, 2, 5 &amp; 10 of officer's comments</p> <p>It is not possible to implement a mileage based parking system</p> <p>The local authority has very few powers or regulatory controls it can use to try to change driver behaviour. The use of an emissions based parking system is the most significant. As legislation changes and we see the introduction of things like Clean Air Zones, we will use this to help in tackling other vehicles as they pass through the borough.</p> <p>The proposed CW3 CPZ will include the southern side of Victoria Road within the Lavender Fields ward</p> <p>As with any new charging mechanisms we can sometimes only make assumptions of its impact and how this translates to the real world. To assess the impact of the new emissions levy we will look carefully at a number of areas including, but not limited to; the change in vehicles types associated with the CPZ's, impact to parking outside the areas, any changes to off-road parking and reduction in emissions at the tailpipe. We also intend to look at a wider more holistic charging system that will capture all types of</p>

can only be a very small proportion of those diesel vehicles that are actually owned by borough residents – as there are many that are parked off-road, in driveways or garages, or in roads where resident parking is not (yet) in force. So you are also intending to only penalise those residents who are actually unable to park off-road, and are forced to pay for a parking permit.

This has to be seen as extremely inequitable and unfair. This proposal will undoubtedly also have the effect of losing yet more front gardens to driveways – to avoid paying outrageous charges just to park outside one's own house. Paving over front gardens is becoming an increasingly prevalent non-green activity, which should also be actively discouraged.

The fact that a driver has a resident's parking permit also does not consider how much mileage he/she does in reality per year – nor indeed whether that mileage is either within the borough or outside – which merely serves to demonstrate what a very badly thought through policy is being proposed.

I do intend to revert to a petrol car when my current vehicle is due for replacement – but to penalise the few for the 'sins' of many cannot be considered fair, and to provide less than 3 months' notice is patently far too short a period for the vast majority to make any changes that might be possible – before even considering the cost of purchasing an alternative petrol/electric vehicle. I find it staggering to understand how Merton Council really believes that so few CPZ permit holders are actually responsible for all the pollution within the borough, and that they should be penalised for it.

#### 2nd Further Representation

As a resident of West Wimbledon for over 25 years, who will be affected by the proposal to implement a diesel levy to the small minority of Merton residents who live in a CPZ and are forced to pay for a Resident's Parking Permit, I thought I should write to you to provide you with a personal copy of my objections that I lodged last week - and to request a response to my questions below.

Since submitting my formal objection, I have been made aware that you are the councillor who has overall responsibility for this proposal, so I would like to believe that if you really consider what you are intending to do, that you re-think this, and scrap the whole idea.

In principle I have no objection to your views that diesel cars pollute far more than we were led to believe when we were persuaded in various ways that they were the correct type of car to purchase some years ago. And when I come to replace my car in due course, I will almost certainly revert to a petrol powered vehicle. However, in the meantime your method of trying to reduce the Borough pollution levels, and to 'influence' Merton residents is so far wide of the mark, that it beggars belief. I have read the minutes of a couple of the 2016 council meetings on this proposal, and there are some statements that I would be concerned about if they were made at a secondary school, let alone by councillors whom we pay to serve us locally. Any impartial observer can only come to the conclusion that this proposed scheme is just another revenue generating idea for the council, under the guise of a green policy to improve the air quality within the Borough. Surely the only fair way to reduce diesel car ownership and therefore

vehicles; including petrol, hybrids and electric.

At this stage the Council is using all available tools to address air quality and the CPZ permits fall under the Council's jurisdiction which can be used as such a tool.

By law, any revenue generated from parking must be spent on transport related schemes. These include but are not limited to, traffic management and control schemes, road and infrastructure schemes and Concessionary Fares.

The Council is aware that the pollution in the borough is not solely due to residents in CPZ's, we know that there is traffic passing through the borough and our residents contribute to this.

There are many initiatives, regulations both old and proposed that are aimed at tackling air pollution caused by freight traffic, buses and taxis, however very few aimed specifically at cars.

We know that diesel cars disproportionately contribute to poor air quality and as such we need to address this where we can.

As other initiatives develop that will enable us to tackle through traffic and other vehicles outside the CPZ's we will consider carefully how we can use this to help reduce poor air quality.

pollution would be to nationally raise the car tax paid by all UK diesel car owners, in the same way that this was reduced some years ago (– for what at that time was a similar reason!). Your efforts should be focussed in this direction.

I look forward to hearing from you please with answers to the following points:-

1. [http://www.merton.gov.uk/z11-25-02\\_cpz\\_work\\_in\\_progress-overview.pdf](http://www.merton.gov.uk/z11-25-02_cpz_work_in_progress-overview.pdf)

Is it true that the map of Merton's CPZs clearly demonstrates that you are unfairly targeting just a small minority of the residents within the Borough?

2. Is it also true that your own ward (Lavender Fields) will remain almost totally unaffected?

3. Do you agree that even within CPZ's – many diesel owning residents are able to park off-road, and would therefore remain unaffected?

4. Do you think that this proposed policy will also result in the 'paving over' of yet more front gardens within the Borough to avoid a resident's parking charge?

5. <http://democracy.merton.gov.uk/documents/s13962/>

[Diesel%20levy%20OS%20Report%20FINAL%20august%2026%2016.pdf](#)

Para 2.9 within this document states about the levy introduction

"It also adopts the long standing principle that the 'Polluter Pays' something that is not recognised in our current scheme."

Could you please confirm precisely how your proposed levy targets all diesel owners within the borough – let alone all those from outside that drive through Merton on a daily basis?

6. Para 2.11 states "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."

How did this study connect the above statement to just those diesel cars owned by residents within CPZ's who are not able to park off-road? i.e. Those that will be subject to the proposed levy.

7. <https://democracy.merton.gov.uk/documents/s15436/>

[Appendix%20C%20officer%20response.pdf](#)

Section 1.5 "It is correct to say that if everyone who owns a diesel vehicle in a CPZ bought a permit with the levy added on, it would not single-handedly reduce air pollution rather, the funds generated would be available to

Given the size and extent of the consultation area, it would have been unfeasible to do a newsletter drop to all properties within all CPZ zones. The statutory consultation was communicated from January 2017 by using the following methods :

- On the council's website
- Advertised in the Local Guardian and the London Gazette newspapers
- Via leaflets and posters at libraries, leisure centres and at Merton Link
- Via all ward councillors
- Via all known resident and business associations
- Via local radio station
- Via social media including several press releases

All arguments put to Scrutiny were considered and addressed accordingly



mitigate the pollution created."

Please could you confirm precisely how you propose to mitigate this pollution with the funds generated?

8. <https://democracy.merton.gov.uk/mgAi.aspx?ID=6402> These minutes include a comment by you:-

"He drew the Commission's attention to information (on page 52 onwards) showing the overlap between air quality hotspots and CPZs".

Are you really of the opinion that there is a causal link between these air quality hotspots and CPZ's? - therefore implying that residents within these CPZs, who happen to own diesel cars and have to pay for a parking permit, spend all day driving around their CPZ polluting their neighbourhood? Or is it actually the general traffic of cars, taxis and lorries from elsewhere outside the borough who are causing this pollution whilst driving through? I live quite near to the A3, which I am sure causes significant local pollution – but this is clearly nothing to do with the CPZ residents who happen to live close by.

9. Further "Councillor Ross Garrod said that he could only take measures that were within the council's power and that communication would take place with affected residents in CPZs."

To my knowledge this household has received no communication about this proposal whatsoever – and if any announcement has been made in the local newspaper, I can confirm that we have not had one delivered since well before Christmas. Their delivery is very erratic and infrequent.

10. Please explain why you appear to have totally ignored the powerful and rational arguments contained within both of the attached documents:-

<https://democracy.merton.gov.uk/documents/s15438/Appendix%20E%20submission%20from%20Alliance%20of%20British%20Drivers.pdf>

<https://democracy.merton.gov.uk/documents/s15584/submission%20from%20RAC%2009.12.16.pdf>

My questions above – and letter of objection below are probably best summed up by your own council observations within the following (p44). I find it quite staggering that you can seemingly just choose to ignore these totally valid council raised comments.

<https://democracy.merton.gov.uk/documents/s15435/Appendix%20B%20call-in%20request%20form.pdf>

(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

<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 150</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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. I look forward to your reply</p>	
<p>83</p>	<p>Entirely agree with this proposal. It has been clear for many years that diesel is environmentally unsound. No reason to pamper to those who were stupid enough to ignore the evidence and buy a diesel car.</p>	<p>Noted</p>
<p>84</p>	<p>Regarding the introduction of a diesel levy, I would agree that this is a good idea and will discourage people purchasing diesel cars. I'm very interested however in how to promote clean alternatives. Reduction of the permit for electric is great however the biggest problem that I see still with electric is the ability to charge for the majority of people who have no off-street parking.</p> <p>I've been following the potential introduction of charging infrastructure and while initially very encouraged by the plans I've now discovered a major issue. The contract with Source-London and the associated costs rule out the solution from a cost perspective. It will cost more money to "park and charge" on our street than to fill up with petrol for the same mileage range, and that's without the monthly membership charge, and at the same time we would need to give up our parking spaces for this company to make money from, presumably for non-residents coming</p>	<p>Refer to point 13 of officer's comments</p> <p>Cheaper alternative methods of charging are being trialled (socket networks) which utilise existing street furniture for those locations not viable for Source London charge points</p>

	<p>into London to park on. This is a massive shame and great opportunity lost.</p> <p>The reason therefore for writing are to explore alternatives for charging from home. At my own expense, are there proposals or options to install pavement channels from a house border to the kerb with removable covers to allow a cable safely from the property to a charging car on the kerbside when parked outside the house?</p> <p>If this or an alternative solution was supported by the council I could see real potential for people to feel and make a difference to air pollution in Merton.</p> <p>I've added Councillor Andrew Judge as cc as I've been discussing the charging points and I thought he would also be interested to know that the actual solution that's being implemented is not fit for the purpose for local residents and seems to be aimed at people driving into Merton to park from outside. This is most likely going to increase local traffic and pollution as well as reduce local parking, which seems like a poor result for the street and local planning.</p> <p>Hopefully you can provide a ray of hope in finding a solution that benefits the environment without compromising any local residents.</p>	
85	<p>I hereby register objection against the Council's plan to introduce unfair Diesel Levy for All CPZ Resident, Business and Trade Permits and a Discounted Rate for Electric Vehicle Parking Permits</p> <p>I have been a resident in Dandonald and in lack of a parking space, have had no choice but to apply for a resident parking. Based on scientific evidences that may be different from the ones that you are using, I have decided to purchase a small car with a 1200cc diesel engine which is said to be cleaner than petrol engines.</p> <p>If you believe that the diesel engine is more halm to health than petrol ones, people who can afford to pay for a private parking space should be charged or penalized rather than people with limited financial ability who cannot afford to pay for a private car parking space. it would be much more fairer if you impose more diesel tax at the time they purchase diesel fuels. This should make sense; more diesel fuel to consume, more tax to pay for.</p>	Refer to points 3 & 5 of officer's comments
86	<p>I read the recent news release on the introduction of the levy on parking permits for diesel cars with interest - I am very supportive of this. I note also the press release mentioned the installation of electric car charging points - I see a number were installed on Dudley Road before Christmas, but are not yet available for use - can you please let me know when you expect them to be activated?</p>	Noted Electric charging points will be activated end of April
87	<p>I am responding to the Merton Borough Council's consultation on the proposed levy charge on diesel vehicles. My concerns about this charge are set out below. Whilst fully appreciating the concerns about the effects of diesel emissions in London and the need to reduce them, I am opposed to the Merton proposals for an additional levy on parking permits for residents with diesel vehicles. If I understand the proposals correctly, this would provide at best a partial and limited reduction in diesel emissions, whilst imposing a heavy (some might say "punitive") burden on a proportion of diesel car owners, whereas many others who drive diesel vehicles in Merton would be exempt from the charge. Moreover, to justify such a significant charge, one would expect to see more substantial and detailed evidence of the current emissions problem as it specifically affects Merton and the extent to which it would be</p>	Refer to points 1,2,3,4,5 & 6 of officer's comments It is not currently possible to introduce a mileage based parking system

reduced by the proposed levy. These observations are amplified below.

#### Evidence

Much of the argument for introducing a levy seems to rely on research into emissions across London as a whole. It is not clear to me to what extent the proposals are underpinned by a extensive monitoring and in-depth analysis of the actual conditions in Merton. Trunk routes which traverse the borough like the A3 are clearly major contributors of emissions, but much (if not the bulk) of the traffic on these roads is through traffic, which will not be affected by the proposed charge. It seems to me that any estimate of potential reductions in emissions as a result of the levy must be treated with caution.

#### Fairness

Since the proposed charge would apply only to Merton residents who have diesel vehicles with parking permits, it follows that residents who own such vehicles, but who are fortunate (and possibly wealthy) enough to have private driveways or other off street parking, would be exempt.

So too would hundreds, if not thousands, of other drivers who pass through Merton from out of borough. This hardly seems fair. The charge would also have a particular impact on less wealthy residents, who already face the prospect of an increase in Council Tax and inflationary cost-of-living increases, and for whom the option of switching to a new electric or less-polluting petrol car may simply be unrealistic, particularly if the value of their diesel vehicle has fallen as a consequence.

#### Usage

The proposed charge appears not to take account, at least initially, of fact that the latest diesel vehicles are less polluting (notwithstanding the recent controversy over manufacturers' claims) and that increasing numbers of vehicles now switch off their engines when stationary.

Also the pattern of usage can vary significantly, with some residents using their vehicles daily for commuting or business, while others may use them relatively sparingly, for example at weekends. A "one size fits all" charge would be a very blunt instrument, particularly when it is only applied in relation to resident parking permits and not based on actual vehicle usage/fuel consumption.

Although Merton appears to envisage the eventual introduction of a "comprehensive emissions-based parking system", it is not clear how this would operate, whether it would apply more generally than to permit holders, and how the issue of "through traffic" would be addressed.

#### What is needed

Instead of a piece-meal, "patchwork" approach that leaves it local authorities to impose charges (in a way which risks being seen as a revenue-raising exercise), I believe there needs to be a comprehensive strategy at the national level aimed at reducing diesel car emissions, through an appropriate mix of taxation on new diesel vehicles (unless or until they meet acceptable standards), changes to road fund tax and diesel fuel duty (the latter to

	encourage less consumption), and incentives for people to buy petrol or electric cars, including a scrappage scheme for existing diesel vehicles (at least the more polluting ones). Only central Government can do this whilst, of course, working closely with local authorities. I hope that the Council will reconsider its proposals for imposing a levy on diesel cars owned by residents with parking permits, pending further debate of these issues at the national and local level.	
88	<p>This proposed levy on Diesel cars is totally outrageous.</p> <ol style="list-style-type: none"> <li>1. Only a few years ago we were told that diesel fuel was less harmful than any other fuel. Diesel cars 3 years and onwards have to undergo a yearly MOT, of which emissions is a very important part of the test. As does all petrol vehicles.</li> <li>2. Why should only owners of diesel cars in CPZ areas be liable for this levy, and not those where there is free parking? Do we see this as selective environmental issues? "This is Discriminator"</li> <li>3. How will raising this money affect the environment? Where will this money go to, and how will it be used?</li> <li>4. It is not only diesel cars that pollute the air. Lets point out the real offenders. <ol style="list-style-type: none"> <li>(a) Aircraft – Heathrow – Gatwick – City Airports</li> <li>(b) Buses – London Transport etc</li> <li>(c) Large lorries, small lorries, Delivery vans to all major super markets, shops etc</li> <li>(d) Construction lorries and machinery etc</li> </ol> </li> <li>5. Will the Council be accountable for this extra money raised from the levy on diesel cars? Will the public be able to access information showing how the extra funds are being used?</li> <li>6. Diesel cars in CPZ liable for diesel levy which will increase "OFF ROAD PARKING" in CPZ in same borough "NO LEVY" why? All cars are driven and produce fumes</li> <li>7. Diesel cars in "FREE" parking zones in same borough "SAME POLLUTION" but no LEVY Why?</li> <li>8. This is blatant DISCRIMINATION however you see it</li> <li>9. If Councils so wish to impose a levy on diesel cars why not consider a fairer way to the motorists eg start with vehicles 10 years and over. This would and should be implemented on ALL VEHICLES in ALL AREAS. That way motorist can move over to the more efficient modern type of car.</li> </ol> <p>To change a car now 1-&gt;2-&gt;3 years old incurs a huge loss to the owner. I hope that Merton Council will reconsider their proposals regarding this unfair diesel levy. The general public were unaware of the proposal until recently, and feel that there should have been more open consultation</p>	<p>Refer to points 10 &amp; 13 of officer's comments</p> <p>Given the size and extent of the consultation area, it would have been unfeasible to do a newsletter drop to all properties within all CPZ zones. The statutory consultation was communicated from January 2017 by using the following methods :</p> <ul style="list-style-type: none"> <li>• On the council's website</li> <li>• Advertised in the Local Guardian and the London Gazette newspapers</li> <li>• Via leaflets and posters at libraries, leisure centres and at Merton Link</li> <li>• Via all ward councillors</li> <li>• Via all known resident and business associations</li> <li>• Via local radio station</li> <li>• Via social media including several press releases</li> </ul>
89	I write to register my dissatisfaction with Merton Councils proposal to increase to the cost of parking permits for the owners of diesel vehicles. For the sake of completeness I am against the proposal. (not a duplicate)	Refer to point 1 of officer's comments
90	I write to register my dissatisfaction with Merton Councils proposal to increase to the cost of parking permits for the owners of diesel vehicles. For the sake of completeness I am against the proposal. (not a duplicate)	Refer to point 1 of officer's comments
91	A few years ago it was encouraged to get a diesel car and now diesel is terrible and a levy is being looked at. People are being penalised in having a diesel car even though it was encouraged. The levy should be charged on	Refer to point 2 of officer's comments

	vehicles over a certain limit as they would cause more pollution than cars.	
92	<p>I think that it is inappropriate for London Borough of Merton to penalise residents like ourselves with this levy. We bought a diesel car based on the current environmental information at the time in 2013, when the government were promoting diesel cars as a greener alternative to petrol ones. Merton's proposed diesel levy is penalising people retrospectively for doing what was seen to be the right thing for the environment. Unfortunately we cannot afford to change our car just because LBM have decided to apply an increased levy to diesel cars; perhaps Merton should compensate us for the devaluation in the resale value of our car by their proposed actions.</p> <p>It would be fairer to introduce the higher rates for people who buy a diesel car from today onwards, knowing Merton's policy. It is not right to apply this to current owners of diesel cars, who acted in good faith when they bought their cars. Please take this email as an objection to London Borough of Merton's current proposal to increase the cost of permits for owners of diesel cars. We have included our ward councillors in our response and expect them to express our views at future council meetings</p>	<p>Refer to point 1 &amp; 2 of officer's comments</p> <p>The introduction of higher rates for people who buy a diesel car in the future would not be an incentive for a change away from diesel</p>
93	<p>1. I strongly agree that polluting diesel vehicles should be discouraged - but there should also be more control over all vehicles parked by drivers with their engines left running whether petrol or diesel types - including commercial vehicles of all types eg coaches bringing people to Wimbledon Theatre have often parked nearby in Wimbledon Broadway with engines running and their drivers just sitting waiting for passengers near the end of performances. In a major traffic artery in the Borough these substantially add to the pollution problems in the area. More control also generally needs to be done about the number of such coaches parked up on these occasions and it is more obvious at pantomime time with parties of school children.</p> <p>2. Coaches have obstructed line of sight for vehicles at junctions entering or exiting Wimbledon Broadway, for example, which has been dangerous and there is no control, policing or other monitoring of this situation. Under the new scheme, the Council should also liaise more with the Theatre to reduce numbers of these large commercial vehicles coming into the area and control them more. This would also help reduce pollution in Central Wimbledon.</p> <p>3. It is noticeable that many private car drivers just generally park and lazily sit in their vehicles with engines running while using their mobile phones etc - this is a London and UK-wide problem and needs to be addressed by all boroughs - this is also a major source of pollution. Perhaps Merton could lead the way in tackling this nuisance.</p> <p>4. In your e mail you say.."The Council will review the effectiveness of the levy in two years' time with a view of introducing a comprehensive emissions-based parking scheme which could link permit pricing to the vehicle's environmental performance".</p> <p>In this regard when considering Residents' Parking permits, I think the Council will have to be careful about how they introduce this scheme covering petrol vehicles - after all whether based on emissions or not, asic smaller cars cannot possibly be compared with large engined Audi or BMW type cars or Range Rovers - to take a few examples of vehicles used by residents and visitors. This will have to be discussed in due course. A 1.1L engine will generally have far fewer emissions than a 1.6L or more for example.</p>	<p>Refer to points 4,12 &amp; 13 of officer's comments</p> <p>At this moment in time visitor permits can be used in any vehicle petrol or diesel so there is not a process to identify the relevant diesel vehicles</p>

	<p>5. Finally, would there be diesel-engine related cost changes for visitors' permits in CPZ's? In fairness this perhaps also has to be considered in conjunction with residents' permit charges.</p> <p>I hope these initial comments about the new scheme are helpful.</p>	
<p>92</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 155</p>	<p>In answer to a question from a member of the public on 1 Feb 2017, the Cabinet Member for Regeneration, Environment and Housing stated that "Air Pollution in London has been described as a 'Public Health emergency'". We agree, and that's why Merton Liberal Democrats would welcome a focus on improving the borough's air quality.</p> <p>We have long been advocates of improving air quality through reduced traffic and congestion – we've supported improved cycling facilities, better public transport and living streets. For example, in early 2012, Merton's Liberal Democrat councillors led the council in calling for the administration to open negotiations with the Mayor about extending the cycle hire scheme. Later that year, Lib Dem councillors proposed a borough-wide "default" 20mph speed limit on residential roads. This has various safety benefits, but limiting the need for acceleration and braking also reduces fuel consumption. Sadly, this option was rejected by the administration and the Conservative opposition. Any proposal needs to be judged on impact and fairness and we would like to know the following of the administration's diesel levy:</p> <ol style="list-style-type: none"> <li>1. Given that air pollution is a "public health emergency", what other options for improving air quality have been considered (whether these are measures to reduce the number of diesel vehicles or otherwise)? And why have they been rejected as against the administration's current proposals? We understand that Kensington &amp; Chelsea and Camden already have emissions-based parking charges in place, and wonder why Merton is simply looking at this as a long-term possibility, when example schemes already exist?</li> <li>2. What is the expected reduction in diesel vehicle numbers resulting from the increased levy? From the report provided, this doesn't appear to have been modelled and should be – it's a significant flaw in the plans.</li> </ol> <p>According to the Cabinet Member, "Encouraging vehicle owners to move away from diesel cars is essential to reducing poor air quality in our borough and in London as a whole." And yet there has been no analysis as to whether this scheme will change behaviour. Indeed, the Cabinet Member's response to a question on this bordered on complacent: "I would consider any shift away from polluting vehicles as a success." The scheme is to be reviewed, but without any idea of what success looks like. A proper framework for review should be put in place.</p> <ol style="list-style-type: none"> <li>3. Has a full equality impact assessment been carried out? Para 8.1 of the report states that that there are no implications of the scheme on "human rights, equalities and community cohesion". We disagree. In broad terms, larger, more expensive properties tend to have off-street parking and so will not be affected by the plans. Furthermore, the levy could be a factor in residents rejecting new controlled parking zones.</li> <li>4. What is the revenue from the levy going to be used for? We feel it should be additional funds for improving air quality and the local environment, and stronger support for walking strategies and electric vehicle infrastructure.</li> </ol>	<p>Refer to points 4,7,12 &amp; 13 of officer's comments</p> <p>A full equality impact assessment has been undertaken</p>

	<p>Can the administration guarantee this will be the case?</p> <p>We're not convinced the case has been made that this proposal will make the impact suggested: there is no work to show this, and no detail on how the levy will be spent. It would be fundamentally dishonest of the administration to be simply using this as a 'backdoor' means to increase Council revenue, and it would undermine the stated aim to increase public education on these matters.</p>	
94	<p>I write to express my objection to the manner of the diesel levy that is proposed from April 2017. I understand the need to reduce emissions and I have no objection to this. I do feel, however, that the way in which you are implementing it is unfair on existing owners. As you are well aware, in 2001 the Labour Government encouraged diesel ownership due to lower CO2 emissions by offering tax breaks and it is for this reason the number of diesel cars on the roads increased significantly. I view it as entirely unreasonable to penalise existing owners of diesel cars who followed the Government's advice only to find out the government had made a huge mistake. It would seem far more sensible to charge the levy in full on all news cars registered after April 2017, as those users have a choice on the type of car they buy and will be fully aware of the tax implications resulting from that choice. I therefore urge you to reconsider.</p>	<p>Refer to point 2 of officer's comments</p> <p>The approach to charge the full Levy for all new cars registered after April 2017 would provide no incentive for owners to change their vehicles</p>
95	<p>This levy is unfair to those who were encouraged to buy diesel cars. Our car has an added substance every few thousand miles to neutralise the diesel which is already a large expense, it therefore seems unfair to have to pay even more. When we had a drive this would not have to be paid, therefore you are punishing those of us who have down sized our houses, and therefore have to park on residents permits. I thought you wanted to encourage the elderly to downsize! Diesel cars also last far longer than petrol cars and are therefore kinder on the environment as they are not replaced as often!</p>	<p>Also refer to points 2,5 &amp; 6 of officer's comments</p>
96	<p>I wish to strongly oppose your proposed changes to parking charges for diesel cars. I think it is unfair and unjustified. It punishes those who bought diesel cars to reduce fuel usage and improve economy to try and be more environmental. This increase for diesel cars should not be allowed.</p>	<p>Refer to points 1 &amp; 2 of officer's comments</p>
97	<p>I strongly object to the new Diesel Tax Levy being introduced in the London Borough of Merton from April 2017. We were encouraged to buy a Diesel car by the Government to reduce the CO2 omissions and save the planet. Now we are being told the emissions are harmful, and the manufacturers gave out in correct figures. We should therefore not be penalised and made to pay more to park in our own CPZ.</p> <p>We have seen no consultations on this matter and wholeheartedly object to the new levy which is grossly unfair on people who have to park in the street.</p>	<p>Given the size and extent of the consultation area, it would have been unfeasible to do a newsletter drop to all properties within all CPZ zones. The statutory consultation was communicated from January 2017 by using the following methods :</p> <ul style="list-style-type: none"> <li>• On the council's website</li> <li>• Advertised in the Local Guardian and the London Gazette newspapers</li> </ul>



		<ul style="list-style-type: none"> <li>• Via leaflets and posters at libraries, leisure centres and at Merton Link</li> <li>• Via all ward councillors</li> <li>• Via all known resident and business associations</li> <li>• Via local radio station</li> <li>• Via social media including several press releases</li> </ul>
98	I support the diesel levy.	Thank you for your comments
99	<p>I write with representations concerning the Merton Council's proposed annual levy on Merton Residents who own/possess diesel vehicles. I am a Merton resident and have owned a diesel car for the last 9 yrs. I object to the levy because:</p> <ol style="list-style-type: none"> <li>1. It discriminates against residents who own existing diesel vehicles that were purchased before they became aware of the initiative.</li> <li>2. While the charge itself is not retrospective it is, in effect, a retrospective tax, resulting from a purchase made without knowledge that the tax would be imposed.</li> <li>3. It would leave residents with the choice of accepting the charge or, disposing of the vehicle at a much discounted price and so at further financial penalty.</li> <li>4. It would add £150 to the cost of my Residents Parking Permit.</li> <li>5. Since the charge is not being proposed by the GLA as part of a Greater London scheme, it discriminates against residents (and thus property values) in Merton relative to other London Boroughs.</li> </ol> <p>I would support a levy that applies from the date the levy is introduced, to diesel vehicles for which a first application for a Residents Parking Permit is made. Such vehicles would also attract the levy on subsequent yearly applications.</p> <p>Diesel vehicles owned by a resident and possessing a Residents Parking Permit at the date of the introduction would be exempt until disposed of by the resident. The levy should not apply to Visitors Permits. (i.e. there should not be a two tier charge for petrol/diesel vehicles).</p>	Refer to points 2 & 6 of officer's comments
100	I am totally opposed to the proposed increase in parking permit cost for diesel cars as I don't think it's fair	Refer to point 1 of officer's comments
101	<p><u>1<sup>st</sup> Representation</u></p> <p>With respect, the Council's discriminatory proposal to levy an extra 'tax' on hapless owners of diesel vehicles</p>	Refer to points 1 & 4 of officer's

<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 158</p>	<p>seems unfair, impractical and futile. The manner of imposing this measure is probably wrong in law. I share the views expressed by Mr XXXXX in his representations in opposing your proposals. I urge you to find some other route to raise revenue –which I suspect is your aim – and/or protect the environment.</p> <p>Experience must have shown you that ‘punitive taxation’ does little to change the habits of addicts. Air quality cannot be controlled by piecemeal measures based on arbitrary administrative boundaries. The hapless owners of Diesel vehicles were encouraged fairly recently to adopt this mode as being better for the environment. To penalise them at short notice seems unfair.</p> <p>Your delegated powers under The Road Traffic Acts (parking provisions etc) should surely only address the purposes of that Act – safety, traffic flows, preventing obstructions etc. The charges you impose for these purposes are fees – which are accountable – and should relate to the service you provide. To assume powers for other purposes, such as changing the habits or preferences of the citizens, seems to go beyond the law. Please think again, and find a better and legal way to achieve your purpose</p> <p><u>2nd Representation</u></p> <p>I cannot get too upset about the increase in charges, or LBM’s efforts to increase its revenue, but I suspect that Council is trying to use the wrong law to do so. The relevant street management law is aimed at avoiding obstructions to traffic. It is not intended as a measure to improve air quality, and avoid climate change. Therefore, the type of propulsion motor of a parked car should not be considered relevant. It is the size of the car that matters.</p> <p>Too often Councils use the street management powers as revenue gathering measures. This is a gross misuse of their delegated powers – which should only be used for the purpose the law is intended to address.</p>	<p>comments</p> <p>The Council can legally use parking legislation to help improve air quality</p>
<p>10278</p>	<p>I would like to express my opinion about the suggested Diesel levy. When I bought my diesel car 10 years ago, I specifically chose it because it had low emissions and therefore it was more environmentally friendly option than equivalent petrol cars. Now all of the sudden it's quite the opposite.</p> <p>I totally agree that the pollution levels should decrease and get under control, but I don't agree that people who bought their cars with good intent should be made to pay. I know this levy will be rolled in regardless, so the only thing I ask you to consider is that there are people who cannot afford a penny more expenses than they are paying already on top of their rents and rates. These are people on low incomes, benefits, disabilities etc. People with no money won't pay for all the costs involved in owning a car for nothing so the car is most likely vital for them, but changing it to a petrol or electric car is simply not an option due to the costs involved.</p> <p>As always, the wealthy part of the community avoids paying the levy as lots of them do not pay for permits anyway as they have private parking facilities. In Wimbledon Village there are tons of huge Range Rovers parked on private roads and driveways. The levy is not going to encourage them to change their behaviour. Please consider people who cannot afford to pay the new levy and introduce either a exemption or a reduced rate for car owners on benefits or low income.</p>	<p>Refer to points 2 &amp; 6 officer’s comments</p> <p>There is no evidence that this levy will disproportionately impact on residents on benefits or low income</p>

103	<p>May I object in the strongest possible terms to your proposed diesel levy.</p> <ol style="list-style-type: none"> <li>1. I bought a diesel car because the government said that it was the green and environmentally responsible choice. You now intend to penalise me for following that advice.</li> <li>2. The parking permit was not introduced as a method of controlling residents purchasing choices or implementing Council policy.</li> <li>3. When we were asked whether we wanted to bring in parking controls, the council informed us that the cost would be at a reasonable level to cover administration costs. We were not told that they would used as a revenue raising device.</li> <li>4. If these changes are to be made, residents should be re-consulted about whether they want a controlled parking zone.</li> <li>5. If punitive charges are to made for owning certain types of vehicles, these should be introduced with a reasonable time warning. Cars are a long term purchase, so at least 10 years would be reasonable.</li> <li>6. These measures will reduce the value of a significant asset. These losses will be the responsibility of the Council.</li> </ol>	<p>Refer to points 1 &amp; 2 of officer's comments</p> <p>The Council can legally use parking legislation to influence air quality</p>
104	<p>I understand it is proposed to tax those who have diesel cars and Merton parking permits in the borough. The stated aim is to discourage diesel vehicles to reduce Nitrous Oxide and other emissions. I agree that this is an issue. BUT: Given that this is a singular action with no joined-up thinking on the totality of diesel usage in the borough it can only be seen as a cynical and very discriminatory tax.</p> <ol style="list-style-type: none"> <li>1. UNFAIR DISCRIMINATION: I live in a semi-detached house where given the size of the front garden am unable to park my diesel car (It is the only diesel car I have ever owned and was purchased as a direct result of national and local government and other campaigns to encourage diesel usage). I have no option but to park it in the street and pay for a parking permit. My neighbour directly opposite me has exactly the same diesel car, lives in a large detached house with a driveway, and does not have a parking permit. They will continue to live and drive in the borough with a diesel car and will not be taxed.</li> <li>2. OTHER DIESEL USERS NOT TAXED: I see no attempt in this proposal to tax other users in the borough who do not have a parking permit but will by definition be the larger number of users..."white vans", trucks, lorries, buses, taxis etc etc....and all the other residents of the borough where there is street parking without permits.</li> <li>3. SIMPLY PUNITIVE AND DOES NOT DELIVER STATED AIM: Given the small target number of vehicles that will be taxed relative to the total number of diesel vehicles in the borough and driving through the borough every day this tax will not deliver the sated aim anyway. What are the calculations...?</li> </ol> <p>I urge that this very cynical tax is reconsidered in favour of a borough-wide, strategically planned and fair approach to dealing with the issue.</p>	<p>Refer to points 1,2,4,5 &amp; 10 of officer's comments</p>

105	<p>I wish to protest in the strongest terms about the unfairness of the proposed levy, which in the case of residents plainly discriminates against one segment of the Merton residential community. There are numerous residents in the Borough with diesel cars; if the aim is to reduce diesel emissions then it would be appropriate to tackle all diesel car owners, not just those who are already paying for the right to park in their own road.</p> <p>Furthermore given the limited extent of resident parking (restricted as it is to the more affluent areas and not all areas which need it) this can only be viewed as a vindictive and politically cynical action. It will raise a limited amount of money which doubtless will not be ringfenced in order to be employed in air quality improvement measures for the benefit of the Borough but just go into the overall Merton tax pot. I urge you to reconsider this unfair and inappropriate proposal</p>	Refer to points 1,2,5 & 13 of officer's comments
106	<p>I wish to register my opposition to this proposed levy, which would be both unfair and ineffective. It would be unfair because it would be retrospective. It seeks to penalise current owners of diesel vehicles despite the fact that when they bought their vehicles they did so in good faith, often believing that diesel cars were better for the environment. They had no idea that they might have to pay a "pollution" levy at a later date. It's also unfair that all diesel owners would be asked to pay the same charge notwithstanding that some pollute far more than others. What about cars that are rarely driven, and/or meet the Euro 6 pollution standard?</p> <p>The levy would be ineffective, at least initially, because it would not change behaviour. Merton residents have to park their cars. Imposing a levy on diesel cars would be rather like chaining someone to a lamppost and then charging them with loitering. The conclusion must be that the proposed levy is not about pollution but about raising revenue. I think the levy would be more defensible if the levy were to apply just to additional cars brought into the borough.</p>	Refer to points 2,3,5 & 13 of officer's comments
107	<p>I am disappointed and surprised to learn that Merton Council has decided to impose a levy on owners of diesel vehicles who pay for residents' parking permits in the borough. I consider this action to be punitive, ill-considered and unfair. It would appear that Merton Council is confident to act outside of the remit of our elected Government who control MOT testing stations, levels of emissions and ultimately VED rates. In 2012 I purchased a diesel car because the emissions were low and for the first year of ownership I paid zero road fund tax. I am a pensioner on a fixed income and I have to consider all costs.</p> <p>My vehicle is currently in VED Band (B) so for 2016/2017 I paid £20.00 road tax. This proves that the vehicle does have extremely low CO2 emission rate. I acknowledge that diesel engines do emit more particulates and NO2 and accept that this has to be tackled by Governments and manufacturers</p> <p>Perhaps this should be the priority before councils get involved with imposing an unfair levy on residents. As you have records of vehicles owned by residents that have to purchase residents' parking permits it seems easy for you to target those who own diesel vehicles.</p> <p>There are other groups of motorists in the borough who may own diesel vehicles that you do not appear to be targeting, as follows:</p>	Refer to points 2,3,5 & 10 of officer's comments

	<ul style="list-style-type: none"> <li>• Merton residents who have off street parking yet own a diesel vehicle</li> <li>• Visitors to the Borough with diesel vehicles who park with visitors' parking permits, on parking meters or in council car parks</li> <li>• People with diesel vehicle who work in the Borough and drive into the borough on a daily basis</li> <li>• Large numbers of battered and elderly vehicles owned by the building industry and service vehicles that are regular road users in the Borough</li> <li>• Motorists from outside the Borough who may own diesel vehicle and "rat run" on a regular basis</li> <li>• Hundreds of diesel trains running through huge ares of the Borough daily</li> </ul> <p>If you are serious about reducing emissions from diesel vehicle to reduce air pollution then please do it in a fair and just way. By picking on me, and fellow residents like me, would seem to be an easy option for you. Perhaps you should consider putting a levy on the Council tax that everyone pays.</p> <p>I urge you to rethink this planned legislation but continue to seek ways to combat air pollution, not in a way that punishes those diesel owners that you have on your database, but in a way affects all diesel vehicle owners/users in the borough. I look forward to hearing your views.</p>	
<p>108</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 161</p>	<p>I am writing in response to the Council's consultation on its proposal for levy on all diesel vehicles registered in Controlled Parking Zones in Merton. I object to this most strongly, on several grounds:</p> <p>1. Firstly, I am somewhat surprised the Council has the powers to do this.</p> <p>When the controlled parking zone in Rayleigh Road was brought in, my understanding was that the charge was to allow me to continue to park my car in the road (which had been free up to that time), and that the revenues would be used to cover the costs, not as a way of raising revenue for the Council, for which there is an established route - the Council tax.</p> <p>Now the proposal is to use the new levy to raise money, albeit that the Council says the money will be spent on "tackling air pollution, local sustainable transport initiatives and necessary infrastructure such as cycle lanes". Isn't that what the Council tax is for?</p> <p>[Is the Council legally able to levy an additional charge on say all red cars, or all cars with a wheel diameter greater than a certain size, and just because they already have to pay for a parking permit?]</p> <p>2. The amounts to be levied are exorbitant - an extra £90 from April 2017, rising to £115 in April 2018 and topping out at £150 from April 2019 onwards. And these are considerably higher than those for diesel cars in other London boroughs (eg £10 in Camden, £19 in Kensington &amp; Chelsea and £96 in Islington). How were these figures arrived at?</p> <p>3. The Council will rake in money and then have to find ways to spend it, whether or not that expenditure is</p>	<p>Refer to points 2,4,5,6,10 &amp; 13 of officer's comments</p>

warranted.

4. As I understand it, the Council also ignored the advice of its own consultants in not consulting with residents on the impact of such a high a levy, with it being argued that residents could seek to avoid it by concreting over their front gardens to create more off street parking.

5. So one impact is expected to be that front gardens will be concreted over. This is environmentally unsound as (on a large scale) it will result in fewer plants, less wild life and additional water run-off into the roads and drains, leading to flooding. Has this impact been assessed?

6. I strongly suspect (and I guess the Council does not know either) that most of the diesel pollution that is in Merton air comes from buses, taxis, vans, and those (plus cars) that originate from outside Merton – none of which would be subject to the levy. So the impact of the levy on the quality of Merton air will be small.

7. The levy will not apply to a large house with a forecourt (and maybe several diesel 4X4s). How fair is that?

8. I agree that the polluter should pay. However this scheme would be far from meeting that aim. It has no relation to how much pollution any one person/car actually creates; it would be much better to raise money (if it is needed), and to change behaviour, via a general increase on the duty on diesel. (And for central government to pass that on to local Councils, ideally in a way that relates to the actual pollution in each borough).

9. It seems likely that Central government will anyway act in some way to make diesel vehicles less attractive, and then Merton residents will be hit by a double-whammy. Would the Council then withdraw the levy? (I bet not).

10. The Government has for many years encouraged car buyers to buy diesel-powered vehicles on the grounds that they were better for the environment (global warming) as they emitted less CO2 than petrol. Diesel cars owners are now being penalised for following this steer. Cars are expensive and are not something most people sell and buy frequently, at least new ones. And the second-hand value is likely to fall.

11. If the Council wants to reduce pollution in Merton, it should remove all the speed bumps. These have been shown to increase pollution as vehicles tend to brake as they approach them and then accelerate away.

12. Finally, these consultations are flawed, as essentially whatever feedback the Council gets, it will do what it wants. (The Council has 'form' - for example in building on Dundonald Recreation Ground and now the proposal to introduce wheelie bins). There is nothing to say in advance what would persuade the Council not to introduce this levy.

In my view, it should be a requirement that all responders should 'declare an interest' in that they should be asked whether they own a vehicle and if so whether it is diesel. I can't see that anyone affected would do other than argue against the proposal, and anyone not affected would argue in favour. The latter group are probably less likely to respond, so my guess is that the responses against will outnumber the responses in favour, but the Council will find some kind of rationale to go ahead anyway. I hope Labour is not counting on my vote in the next local elections

109	<p>I live at XXXXXXXX in Zone 4f. Since the parking zones were changed several years ago, parking on the border of the zone is an absolute nightmare which negatively impacts the residents quality of life.</p> <p>We often cannot park after 6:15pm during the week, people sit in their cars waiting for the end of restrictions (you never see a warden) and on Sundays. The NHS building on the Broadway have been given free permits which now means they use the permit bays during the day. I used to have to drive to work but because of the parking situation had to leave earlier than I would have liked in order to park, this was unfair on me and the company and I no longer have this job. We get very little for our permits, we often cannot park, the neighbouring streets use our zone for their visitors and also pay less per hour for their visitors parking permits. To increase permit fees for diesel vehicles, (which many people are stuck with because of the VW emissions problem) without consultation, adds insult to injury. Please review parking in the borough to ensure it is fair to everyone.</p>	<p>Refer to point 5 of officer's comments</p> <p>Should the residents within a CPZ require a change in hours of operation that would provide further protection against non-permit holders, they would need submit a petition and the Council will consult accordingly.</p>
110	<p><u>Res Association</u></p> <p>We think any reduction in diesel emissions is a good thing in Merton and the rest of London. However, a parking levy will not reduce emissions, but will increase revenue for Merton Council of course. The only way to reduce emissions is to extend the low emissions zone to all vehicles. Why not propose this to the Mayor?</p> <p>Then Merton Council vehicles such as dust carts, coaches and lorries should be converted to electric NOW. All London buses and taxis should be converted from diesel to electric NOW. All local delivery vehicles should be converted NOW.</p>	<p>Refer to points 1,5 &amp; 10 of officer's comments</p>
111	<p>I would like to register my unhappiness with the diesel parking price increase (ref ES/Diesel Levy). I dont doubt that those polluting should pay more but I have always been told by the council that the parking permit is purely there to pay for the costs to ensure that traffic wardens can enforce the parking rules so that those with permits can park. That made good sense. At no point has it been stated that it is a tax raising power or it is an anti pollution tax. So why is it more expensive to monitor the parking of a diesel car vs a non diesel car? Or was the previous stated aims of the parking permit fee now been changed into a tax raising / pollution tax?</p> <p>This rule does not impact any diesel car owner that has a parking space so if it is a anti pollution tax then it seems to be only targeting the people that cant afford the luxury of having off street parking. So smaller houses and flat owners. The rich dont seem to be impacted by this rule. It feels the council is not being entirely honest in the past or maybe not now and it appears to be a money grabbing approach using the stealth of a vice / sin tax so people cant complain.</p> <p>Can the council think of a more straightforward, open and fair approach to either raising taxes or in their anti pollution policy especially as it does not take into account how much the car is used or the pollution produced.</p>	<p>Refer to points 1, 5 &amp; 10 of officer's comments</p>
112	<p>This household is FIRMLY OPPOSED to the proposal to put a levy on diesel permits because</p> <p>1. Only 5 years ago central government were encouraging us to BUY diesel cars - that advice was misguided but it is not easy to ditch a car and change our ownership policies when the 2nd hand market is so poor. We may have</p>	<p>Refer to points 1,2,5 &amp; 10 of officer's comments</p>

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	<p>little choice but to use the car until its value can be written off the household balance sheet.</p> <p>2. Surely it is inappropriate for a London Borough to take unilateral action against a small sector of the ratepayer community. Are you taking action against the diesel taxis that chug past our house several times an hour? Or the diesel van owners? If not why not?</p> <p>3. So you are proposing a unilateral tax on ownership but not usage. But not all owners but those who have to park on street and are not lucky enough to have a garage or driveway. Those diesel car owners are being unfairly taxed. A proposal to tax all diesel owners in Merton might at least offer consistency and punish all owners, not just those without driveways or garages</p>	
113	<p>I am delighted to hear of the planned increased parking levy on diesel cars. It is good to know that something is being done in Merton to reduce the worryingly high levels of air pollution</p>	<p>Thank you for your comments</p>
114	<p>We hereby set out our objections to the proposed diesel levy proposed to be introduced by the London Borough of Merton. Our objection is divided into three separate areas:</p> <ol style="list-style-type: none"> <li>1. Disproportionate impact on residents located within controlled parking zones;</li> <li>2. Unreasonable decision by the Council including non-provision of alternatives; and</li> <li>3. Breach of human rights of local residents.</li> </ol> <p>The first issue that we have with the proposal is that it will only apply to residents within CPZ. Of course, these residents already pay additional charges over and above residents that do not live within such areas. The purpose of creating CPZs is to deter commuters, however, this new measure will deter existing residents, who may be reliant on a car from owning a car. This is clearly totally unreasonable and will not achieve the purpose of the measure. The only way for Merton to achieve a real and proportionate reduction in diesel car ownership is by a borough-wide tax and not penalising people for where they live.</p> <p>The second issue is that the Council's approach for taxation is wholly unreasonable given that no alternatives have been promoted by the Council. This tax on local residents is premature and wholly unreasonable. Should the Council had implemented a wide range of measures to allow for local residents to achieve a move towards local carbon vehicles, then this measure may have been acceptable. However, the Council has done nothing of the sort.</p> <p>There are no hydrogen filling stations in the Borough and the electric charging point system is extremely patchy. The decision to invest in additional charging points has only just been made <a href="http://democracy.merton.gov.uk/ieDecisionDetails.aspx?Id=394">http://democracy.merton.gov.uk/ieDecisionDetails.aspx?Id=394</a> and these have not yet be installed. As such, it is our view that this tax is premature and the Council should invest in carbon reducing technologies rather than tax a limited number of residents. Furthermore, this measure may lead to residents in these areas moving towards petrol cars rather than low carbon alternatives, thus making the entire tax wholly contradictory and, in fact, making the</p>	<p>Refer to points 1,5,10 &amp; 12 of officer's comments</p> <p>The council is legally entitled to use the parking permit system to address issues of poor air quality</p> <p>We do not consider that the introduction of this levy is in conflict with residents' human rights</p>



<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 165</p>	<p>situation worse.</p> <p>Finally the third issue is that the proposal breaches the Human Rights Act 1998 and the EU Convention on Human Rights. In particular, there is a breach of: PART II THE FIRST PROTOCOL ARTICLE 1 Protection of property</p> <p>Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law.</p> <p>The preceding provisions shall not, however, in any way impair the right of a State to enforce such laws as it deems necessary to control the use of property in accordance with the general interest or to secure the payment of taxes or other contributions or penalties.</p> <p>The proposed unfair and unreasonable tax on a limited amount of people is more than likely going to lead to some people having to relinquish their possessions (cars) without any alternative. This tax will lead the Council depriving people of their possession, and whilst there is public interest in reducing air pollution, the discriminatory and unreasonable measure proposed by the Council means that this is targeted at specific people rather than providing an overall response.</p> <p>To conclude, we consider that this tax on certain residents in the London Borough of Merton is wholly unreasonable, unfair, discriminates against some residents and will not achieve the purpose of the tax. It is also premature and ineffective and may lead to increased emissions rather than reduced ones.</p> <p>We urge you to drop this ill-conceived tax and work on a proportionate and effective plan that does not penalise a small fraction of local residents.</p>	
<p>115</p>	<p>I have no doubt that if you are determined to introduce the additional levy on diesel vehicles via the parking permit scheme then you will do it. However I feel that it unfairly penalises residents such as myself who have diesel MPV cars of only 2 years old with relatively clean and efficient engines, who only do short journeys 2 or 3 times a week.</p> <p>We are also not in central London with a high concentration of traffic. If you could phase road works and traffic light timings in a better manner to reduce traffic cues or introduce hybrid buses which do not run on diesel this would be a better option. Until the government introduces a ban on the sale of all diesel cars and the price of second hand diesel cars starts to come down significantly we will still have this problem. In fact several years ago we were encouraged to buy diesel cars rather than petrol. I feel you are tickling around the edges with what is basically a stealth tax.</p> <p>We are already penalised by higher fuel costs. As a family we get the bus more than we used to and walk more. This needs a rethink. The cost of parking will simply be passed on. What about delivery vans which have no parking permits – no charge there!</p> <p>I feel there has been a lack of publicity about this. I never received a leaflet. This is under the radar stuff. Please</p>	<p>Given the size and extent of the consultation area, it would have been unfeasible to do a newsletter drop to all properties within all CPZ zones. The statutory consultation was communicated from January 2017 by using the following methods :</p> <ul style="list-style-type: none"> <li>• On the council’s website</li> <li>• Advertised in the Local Guardian and the London Gazette newspapers</li> <li>• Via leaflets and posters at libraries, leisure centres and at Merton Link</li> </ul>

	reconsider.	<ul style="list-style-type: none"> <li>• Via all ward councillors</li> <li>• Via all known resident and business associations</li> <li>• Via local radio station</li> <li>• Via social media including several press releases</li> </ul> <p>Also refer to points 1,3,6,10 &amp; 12 of officer's comments</p>
116	The diesel levy is an excellent idea, there is now so much clear evidence that the pollution from this fuel is causing harm. Many will complain but diesel is indefensible and it is unjust for people to suffer poor health and premature mortality because of flawed government policy incentivising diesel in the past. My only comments would be that it would be good to put the levy on all vehicles registered in the Borough rather than just those who park in CPZ zones. Is there a way you could do this working with the DVLA? It may also be worth considering a discount for electric and small volume turbo engine vehicles.	Refer to point 5 of officer's comments
117	<p>The statement of reason for the introduction of the diesel levy on parking permits state that its intention is to "...encourage and incentivise diesel vehicle owners to consider adopting lower or zero emission technologies. This will lead to reduced harmful emissions, particularly nitrogen dioxide and particulate matter within the borough and thereby mitigate their adverse impact on the health of residents".</p> <p>There is no doubt about the significant impact of vehicle emissions on air quality and health and I believe strong action is needed to improve emissions for both climate change and health reasons. However I strongly object to this diesel levy and the way this is being introduced on the following grounds.</p> <ul style="list-style-type: none"> <li>- It penalises parking not the use of the vehicle and distance driven, I could have much lower emissions from my car because I hardly use it than someone using a petrol car every day.</li> <li>- It is an extremely unfair levy as those that have garages and/or off-street parking (and do not need a parking permit) for diesel cars produce emissions in the same way as those having to park on the street, so those in smaller houses or flats are penalised disproportionately.</li> <li>- It does not give fair warning to actually encourage and enable financing of a different car, the levy is proposed to come into force in less than 3 months; most people cannot afford to simply buy a different car in a short time period.</li> <li>- A policy to reduce the number of diesel vehicles should be a national or at least London-wide policy and part of a much wider strategy on air pollution and low emissions vehicles (cost vary considerably between boroughs, £90 in Merton, £10 in Camden, £19 in Kensington &amp; Chelsea). It is an extremely blunt legislative instrument and seems to be more about raising income for the council. What is the evidence base on which this decision is made in terms of</li> </ul>	<p>Given the size and extent of the consultation area, it would have been unfeasible to do a newsletter drop to all properties within all CPZ zones. The statutory consultation was communicated from January 2017 by using the following methods :</p> <ul style="list-style-type: none"> <li>• On the council's website</li> <li>• Advertised in the Local Guardian and the London Gazette newspapers</li> <li>• Via leaflets and posters at libraries, leisure centres and at Merton Link</li> <li>• Via all ward councillors</li> <li>• Via all known resident and business associations</li> <li>• Via local radio station</li> <li>• Via social media including several</li> </ul>

<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 167</p>	<p>being an effective policy tool to improve air quality?</p> <p>I am also extremely angry about the way this is being done without proper consultation. I have not received any information to my address informing me of the plans of the council and/or the deadline for representations.</p> <p><u>Further Representation</u></p> <p>I absolutely agree that air pollution needs to be tackled in London and I am fully aware that in many areas the annual limits are breached by January. This is not disputed.</p> <p>As you are probably aware, the government has recently lost its judicial review brought by ClientEarth with regards to the quality of its plans for improving air quality as soon as possible. Furthermore, last week plans for a diesel car scrappage scheme were announced. This suggests that in the near future a better targeted and more effective policy will be introduced to reduce the number of diesel cars in London which very likely will support the intended policy outcome of reducing harmful particle emissions and therefore improving air quality and health.</p> <p>This stands in marked contrast to the regressive policy of the diesel parking levy which disproportionately affects those on lower incomes who cannot afford a driveway, garage, or to replace their car at relatively short notice. In reference to your comments below, you were hoping that government would take the lead on air quality and it seems likely that this will now happen.</p> <p>With regards to the consultation, I am extremely disappointed that you consider the way the information was available a sufficient process to be considered a consultation. I live on the edge of Merton Council and use more facilities in Wandsworth than Merton. Considering the council is perfectly able to remind all residents who currently require a parking permit of their renewal dates, a letter pointing out the proposed plans with references to additional information would have been a simple solution to ensure awareness and engagement. I sincerely hope the council will reconsider its plans in the light of new government policy which has been announced and either abandon its regressive policy or delay it to coincide with financial incentives to replace diesel cars. I look forward to your response</p>	<p>press releases</p> <p>Also refer to points 1,5 &amp; 6 of officer's comments</p>
<p>118</p>	<ul style="list-style-type: none"> <li>• Totally agree that more needs to be done (nationally) to reduce diesel pollution</li> <li>• BUT this penalises those without off-street parking. Most polluting diesel cars in Wimbledon are the huge 4X4's in the village and surrounds. They have off-street parking/ driveways/ garages so won't be penalised. Poorer people are paying for their pollution . This is a regressive tax and surprising from a Labour Council</li> <li>• The above link is not clearly worded and seems to imply that all CPZ permit costs will be rising. Please clarify that these price increases apply only to permits for diesel vehicles and that the cost for petrol engine cars will remain at £65pa for the foreseeable future</li> </ul>	<p>Refer to points 4 &amp; 5 of officer's comments</p> <p>The levy will only apply to diesel vehicles.</p>
<p>119</p>	<p>I am very concerned about the stealth tax you are introducing. Which in 2014 you promised you wouldn't. This is yet another stealth tax on the working class. I have a 1.3 litre. What about the bigger engines.</p>	<p>Refer to points 1 &amp; 6 of officer's</p>

	I can't afford off street parking. I live in a small flat. What about the huge Land Rover fuel guzzlers all the rich people drive. I need my van to make a living. How about, if you are so concerned, giving people a finical incentive to change instead of taking money out of their families mouths. I will never be voting labour again.	comments
120	<p>I have picked up from Stephen Hammond's newsletter that Merton intends to levy all residents living in a CPZ area for diesel owned cars.</p> <p>We have not been consulted on this issue and despite the claims of the Council when the parking zones were first introduced against the wishes of many residents, we were assured that the council would not look to make a profit from the scheme. This is now clearly not the case.</p> <p>The vast majority of the CPZ schemes are located to the West of the borough and here in the Village area all the streets are subject to the order. This levy (the highest by far in London) will unfairly penalise residents who do not live in a large house with off street parking. In our own road off street parking is impossible for the vast majority of the residents and therefore we will be expected to pay huge sums of money to drive our vehicles that only a short time ago, we were encouraged to purchase by the Government.</p> <p>My own diesel vehicles was purchased by my company as an eco-friendly car with very low emissions. How will this be treated by the scheme? The Council surely cannot be serious in addressing the issue of pollution if this is the best you can come up with? Much of the borough's pollution comes from commuter traffic, lorries and buses. This scheme will do nothing to assist and will only further alienate the very people that you are in your role to represent.</p> <p>This charge will of course add greatly to the Council coffers and no doubt that was foremost in evaluated the levy. The council should not be in the business of unfairly discriminating against residents who do not have off street parking and I will looking to take this matter further. As a minimum the council should have ensured that every household in a CPZ area had clear notification that this was being proposed as none of my neighbours knew anything about it.</p>	<p>Given the size and extent of the consultation area, it would have been unfeasible to do a newsletter drop to all properties within all CPZ zones.</p> <p>The statutory consultation was communicated from January 2017 by using the following methods :</p> <ul style="list-style-type: none"> <li>• On the council's website</li> <li>• Advertised in the Local Guardian and the London Gazette newspapers</li> <li>• Via leaflets and posters at libraries, leisure centres and at Merton Link</li> <li>• Via all ward councillors</li> <li>• Via all known resident and business associations</li> <li>• Via local radio station</li> <li>• Via social media including several press releases</li> </ul> <p>Also refer to points 3,5,6 &amp; 10 of officer's comments</p>
121	I am objecting to the extreme rise in cost of Parking Permits for residents who have diesel cars. This must be deemed very unfair on the owners. Not everyone can throw a car away and replace it just like that. I would have thought that the Council should be helping these owners to get rid of theirs diesel cars by offering a scheme similar to the scrappage scheme of yesteryear, rather than penalising them for having cars that the Government/Council encouraged them to have.	Refer to points 1,2 & 6 of officer's comments
122	I wish to object most strongly to the proposed diesel levy to be introduced on 1st April, 2017. The proposal is, apart from anything else, contrary to the manifesto of the ruling party on the Merton Council in 2014 to 'continue to freeze the cost of resident and visitor parking permits for another four years', there is little evidence that it will actually help	Refer to points 1,2,4,5,6,10,11 & 13 of officer's comments

<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 169</p>	<p>improve the air quality in the borough and no guarantee that the extra money raised will be used for environmental or anti-pollution measures.</p> <p>Successive central governments of both political persuasion have encouraged the purchase of diesel cars in order to reduce the emissions concerns about petrol powered vehicles. It is totally unacceptable to penalise those who have followed this encouragement</p> <p>The proposed levy is a 'one size fits-all' levy covered the oldest and most inefficient and polluting vehicles as well as much more recent Euro 5 and Euro 6 complaint diesel engines which have very low levels of polluting emissions.</p> <p>We have specifically bought a new car with a Euro 6 diesel engine for this reason and see no reason why we should be penalised for having done so. The vehicle does very little mileage in congested urban areas, mainly being used out of London.</p> <p>If this levy is imposed, as far as we are concerned, Merton Council will be the net loser. We have off street parking and purchase a parking permit for infrequent parking in local restricted areas when we have visitors. If the levy is introduced, we shall no longer purchase a parking permit but will keep the vehicle off the road on our private drive. Thus not only will Merton Council not get the 'Diesel levy' but it will lose the revenue from the existing parking permit. What a big win for Merton Council!</p> <p>If Merton Council is so concerned about diesel emissions, can you please advise me:</p> <ol style="list-style-type: none"> <li>1. When will Merton Council have phased out all diesel vehicles from its vehicle fleet and required all of its contractors to do likewise e.g. waste collection vehicles and what will the cost be, no doubt to the Council Tax payer, or maybe more services will be cut back.</li> <li>2. When will Merton Council prohibit the geriatric and filthy black cabs from the Borough, particularly those parked at Wimbledon Station with their engines running, pumping out great quantities of noxious emissions.</li> <li>3. When will Merton Council ban all non-Euro 5 and Euro 6 commercial vehicles, including vans, from the Borough. These are the vehicles that sit for hours in dense traffic pouring out noxious fumes.</li> </ol> <p>Should you not respond satisfactorily to these questions, I will table a Freedom of Information request.</p> <p>I trust forlornly that Merton Council will change its mind on this matter and direct its energies to more useful and pressing matters rather than jumping on yet another politically correct bandwagon.</p>	
<p>123</p>	<p>I object to the proposed levy--please advise the legislation that you claim allows this charge by a local council? which wards do the proposals affect?</p>	<p>Given the size and extent of the consultation area, it would have been unfeasible to do a newsletter drop to all</p>

	<p>why has there been no advance consultation?</p>	<p>properties within all CPZ zones. The statutory consultation was communicated from January 2017 by using the following methods :</p> <ul style="list-style-type: none"> <li>• On the council’s website</li> <li>• Advertised in the Local Guardian and the London Gazette newspapers</li> <li>• Via leaflets and posters at libraries, leisure centres and at Merton Link</li> <li>• Via all ward councillors</li> <li>• Via all known resident and business associations</li> <li>• Via local radio station</li> <li>• Via social media including several press releases</li> </ul> <p>The Charge will affect all wards where CPZ’s operate</p>
<p>12470</p>	<p>Thank you for publishing the consultation on the diesel levy.</p> <p>This is a highly disappointing move which will penalise a broad class of drivers as a blunt instrument. The proposed levy does not reflect the difference between newer and older cars, or take a broader overview of how to tackle all emissions in a positive way. It would penalise the owners of lower emission vehicles which happen to be diesel whilst not discouraging ownership of older more polluting petrol vehicles.</p> <p>This is also contrary to the direction of travel taken in general on emissions, where the overall level of emissions is the key driver (as it reflected in VED).</p> <p>The size and scale of the levy also seems highly disproportionate when compared to others who have introduced something similar.</p> <p>The move to introduce the levy in large steps over a short space of time also penalises owners of vehicles who are not able to replace them at short notice, and imposes an additional cost on families who are already struggling with the increased cost of fuel in an environment when wages are reducing in real terms.</p> <p>It is also surprising that a broader scale consultation was not undertaken, given the impact that this will have on residents and businesses</p>	<p>Given the size and extent of the consultation area, it would have been unfeasible to do a newsletter drop to all properties within all CPZ zones. The statutory consultation was communicated from January 2017 by using the following methods :</p> <ul style="list-style-type: none"> <li>• On the council’s website</li> <li>• Advertised in the Local Guardian and the London Gazette newspapers</li> <li>• Via leaflets and posters at libraries, leisure centres and at Merton Link</li> <li>• Via all ward councillors</li> <li>• Via all known resident and business</li> </ul>

		<p>associations</p> <ul style="list-style-type: none"> <li>• Via local radio station</li> <li>• Via social media including several press releases</li> </ul> <p>Also refer to points 3 &amp; 6 of officer's comments</p>
125	<p>My views as requested for the Diesel Levy consultation:</p> <p>I believe strongly that air quality is a major issue for London and that effective measures to improve it should be taken capital-wide. However, I do not believe that Merton's plans to introduce a diesel levy are the answer, for the following reasons:</p> <ol style="list-style-type: none"> <li>1. Surcharging residents who already have a parking permit will not in itself help improve air quality. My car is used maybe twice a week; the rest of the time I and my family travel throughout the borough and beyond by bicycle. My static (modern diesel) vehicle causes less pollution than the many vehicles that pass down Haydons Road every day yet they won't pay and I will. This makes the proposed levy both unfair and ineffective.</li> <li>2. The charge levels are significantly higher than other boroughs and thus unfair. Council officers when questioned seem unsure how effective this new measure will be. Introducing a random levy without any clear idea of what 'success' will look like is unscientific and ineffective.</li> <li>3. Air quality monitoring in this borough appears sporadic and random. If Merton Council is serious about reducing pollution in the borough it should have a more radical approach to encouraging motorists to drive less. This could include improved cycle lane provision and publicity, and an end to the offer of free parking to lure drivers into centres including Raynes Park and Wimbledon.</li> </ol> <p>In summary, I believe that the proposed diesel levy is an ineffective, ill-thought out measure that will have a minimal effect on air quality in the borough and should therefore be shelved pending a more thorough investigation into how better to reduce pollution and support more sustainable transport solutions across Merton.</p>	<p>Refer to points 1,5,6 &amp; 12 of officer's comments</p>
126	<p>As a local resident and owner of a diesel car I am shocked and disappointed that you choose to tax me for driving my car. When I bought the car in 2011 it was on the basis that it had such low emissions that I do not pay road tax nor the Congestion Charge. Since then the Mayor of London has removed the latter advantage with a 3 year notice period that ended in 2016.</p> <p>Government guidance at the time of my purchase was that my decision to buy diesel and low emission was the best one for the environment. Yet now you expect me to pay for that privilege or buy a new car. In this current economic climate neither is helpful.</p> <p>An incremental introduction is not fair either and whilst I recognise that views on the impact of diesel have changed</p>	<p>Refer to points 1,2 &amp; 6 of officer's comments</p>

	<p>over the past 6 years it would be much fairer to give 3 years notice as the Mayor of London did before introducing the charge. I also run a small local business and along with other charges and tax increases from both local and central government it will have an impact on our operations and likely lead to a reduction in the people we employ locally.</p>	
<p>127</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 172</p>	<p>I have become aware of our Labour councillors decision to not only breach their election promise but to do so without consultation against the advise of their own paid advisors (good use of public funds there then).</p> <p>I object strongly to this blatant revenue generating scheme whereby Labour seek to penalise the owners of Diesel cars under the pretence of caring about the environment.</p> <ol style="list-style-type: none"> <li>1. A parked car does not produce any emission's, diesel or otherwise, so linking this levy to a parking permit shows a staggering lack of common sense.</li> <li>2. If I am rich enough to have a large drive way then I don't pay anything. So even if you think the argument about linking the levy to parking is valid then the idea that a car parked on a drive way wont get taxed but one on the road will is simply idiotic.</li> <li>3. Are you going to issue two different types of visitors passes or don't you care about people driving into the borough in Diesel cars?</li> <li>4. I have a permit that covers two cars - one petrol and one diesel - will my permit only incur half the levy?</li> </ol> <p>Given the national nature of car ownership, i.e. the fact that car owners don't simply drive around their local area this proposed levy is nonsensical in the extreme and typical of Labour.</p> <p>If you wish to go it alone on protecting the local environment from the evils of diesel then here are some suggestions from my 7 year old that she came up with in less than 10 minutes;</p> <ul style="list-style-type: none"> <li>* Ban black cabs from the area.</li> <li>* Ban black cabs from sitting in taxi ranks with their engine running.</li> <li>* Ban the highly polluting buses from the streets and invest in clean energy versions. I assume that's very achievable as you seem to think it should be for individual citizens.</li> <li>* Apply the levy based on diesel ownership rather than where we park.</li> <li>* Apply the levy to all diesel traffic that passes through the borough.</li> <li>* Increase the cost of parking in all borough car parks for diesel cars versus non diesel cars.</li> <li>* Target old cars rather than modern diesel cars with top end catalytic converters.</li> <li>* Get rid of the sleeping policeman so you don't need a 4 wheel drive to avoid damaging your suspension on every journey.</li> </ul>	<p>Refer to points 1,4,5,10 &amp; 13 of officer's comments</p> <p>The levy is based upon a diesel vehicle regardless of the amount of use.</p>



	<p>* Petition the government to penalise non environmentally friendly cars with higher road tax. oh hang on a minute .. they already do!</p> <p>* Penalise local businesses that use Diesel transport.</p> <p>I don't hold out much hope of common sense prevailing from Labour but I would like clear, direct, and concise answers to the following please;</p> <ol style="list-style-type: none"> <li>1. Why are you breaking your election pledge.</li> <li>2. Why do you think it is logical to penalise hard working white van man that can't afford a house with a drive way while ignoring a rich man with a fleet of diesel cars and a large driveway. Hardly seems in line with you socialist rhetoric.</li> <li>3. Are you going to ensure that all revenue raised is used for environmental protection without reducing the existing budget.</li> <li>4. Why don't you tackle the real cause of diesel pollution in Merton which is black cabs and buses.</li> </ol>	
<p>128</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 173</p>	<p>This is a cynical, unilateral revenue increase proposal which, logically, has little to do with environmental protection and blatantly and unashamedly penalises those who have legitimately followed Government advice to drive diesel vehicles and just happen to hold residents parking permit versus those who don't have permits (by far the greater number) and it is LBM who have chosen which areas have resident parking and those who have not; so it is also completely arbitrary. The lack of logic and fairness is demonstrated by the following points:</p> <ul style="list-style-type: none"> <li>• Cars do not pollute by being parked, only by being driven, yet the levy is on parking not driving. If a vehicle leaves the borough for the majority of its driving life the pollution is not in Merton, so when did Merton become the conscience of the UK or wider world?</li> <li>• This is a flat rate, not graduated, so smaller vehicles are charged the same rate as larger ones which is both unfair and penalises disproportionately. I assume the administrative effort in determining a graduated levy would not be cost effective in raising additional revenue, which is what this is all about.</li> <li>• Many motorists bought their diesel car when they were encouraged by government a few years ago to do so through tax breaks etc. diesels then being considered greener than petrol vehicles. However, the scientific thinking has now changed but many people haven't switched cars as recognised by Government and maybe better technology in particulate capture will make this levy obsolete anyway.</li> <li>• Will those driving through Merton be charged as they are polluting as much as, or more than, resident permit holders? Of course they won't because they are a more difficult target.</li> <li>• Cars parked in non-controlled zones or on private land cause the same pollution as those in Residents' Parking Zones; but they will not be subject to this levy, which seems unfair and will certainly reduce the effectiveness of the levy, if a proportion of those who have permits decide against renewing them and parking on their drive instead of in</li> </ul>	<p>Refer to points 1,2,3,5,6 &amp; 10 of officer's comments</p>

	<p>controlled bays adjacent to their residence</p> <ul style="list-style-type: none"> <li>• If Merton wish to tax diesel vehicles they should ask DVLA to add a Tax to all diesel vehicles registered in the borough, but that would also be undemocratic as it would penalise LBM resident compared with all other LA's in the country and this, in effect, is a Governmental issue not a local issue</li> <li>• The net result of this proposal is likely to be a reduction in resident parking revenues, not pollution; as this undemocratic, disproportional and ill-considered proposal will undoubtedly result in current permit holders finding alternative parking arrangements on their own property. If that involves paving front gardens then this will also reduce green space.</li> </ul> <p>If Merton wish to tax diesel vehicles they should ask DVLA to add a Tax to all diesel vehicles registered in the borough, but that would also be undemocratic as it would penalise LBM resident compared with all other LA's in the country and make Merton less desirable to live in; as will this proposed levy. This whole proposal is an ill thought out revenue capture mechanism, will be ineffective in reducing pollution in the short and medium term and will most probably reduce resident parking income for Merton in the short and long term.</p>	
129	<p>I believe the current proposals to introduce a diesel parking permit is unfair. Serially governments have stoked demand for diesel cars by reducing rates of company car tax for diesel vehicles. Both this and the reduced diesel fuel duty were introduced to encourage drivers into diesels for their lower CO2 emissions. While I understand recently, the ongoing emissions scandal has brought the negative effects of NOx emissions into the public eye. The tax breaks, which were introduced by Gordon Brown and helped to bolster diesel sales considerably, are now being recognised as a mistake, given the harmful properties of NOx, even with the reduced CO2 levels taken into consideration. I believe manufacturing and sales should change and thereby bring about the required changes more fairly.</p>	Refer to points 1 & 2 of officer's comments
130	<p>I have been told that Merton Council intends to impose an increase in parking permits for owners of diesel vehicles, effective from April.</p> <p>The purpose of my e-mail is to elicit if there is to be any formal notification &amp; consultation process with those of us potentially affected?</p>	<p>Given the size and extent of the consultation area, it would have been unfeasible to do a newsletter drop to all properties within all CPZ zones. The statutory consultation was communicated from January 2017 by using the following methods :</p> <ul style="list-style-type: none"> <li>• On the council's website</li> <li>• Advertised in the Local Guardian and the London Gazette newspapers</li> <li>• Via leaflets and posters at libraries, leisure centres and at Merton Link</li> </ul>

		<ul style="list-style-type: none"> <li>• Via all ward councillors</li> <li>• Via all known resident and business associations</li> <li>• Via local radio station</li> <li>• Via social media including several press releases</li> </ul>
131	<p>It is now well established that air pollution is a major cause of premature death. In particular, in London it leads in the region of 9000 premature deaths every year [1]. The main causes are</p> <ul style="list-style-type: none"> <li>- oxides of nitrogen (NOx ) which leads to asthma and lung infections and so to about 5,900 premature deaths in London of which there are about 140 in Merton each year [1].</li> <li>- small particulates (PM2.5 and PM10) which leads to asthma, impaired lung function, cardiovascular mortality and so to about 3,500 premature deaths in London of which there are about 80 in Merton each year [1].</li> </ul> <p>By far the main local source of both these are exhausts from diesel vehicles. Petrol cars emit very little of these pollutants, see [3] page 31.</p> <p>To put it in perspective, the yearly death toll in London due to air pollution is equivalent to a poorly controlled outbreak of ebola, as happened in Sierra Leone. Alternatively, the death toll is equivalent to having a major terrorist attack several times a week.</p> <p>Another way to view the matter is that air pollution leads to more than 7% of all premature deaths in Merton. In contrast your risk of dying on a given trip by plane is about 0.00001 %.</p> <p>Of course it is true that people who brought diesel cars in the distant past benefitted from a subsidy, however, it is now clear that diesel vehicles are causing massive loss of life, as well as many hospital admissions. Is it reasonable to stand by and do nothing, or should we not accept responsibility for our own actions and help our neighbors and perhaps even ourselves.</p> <p>In view of the above comments I strongly support the actions of Merton Council to discourage the use of diesel cars.</p> <p>References: Some reliable sources of the above information are</p> <p>[1] H. Walton, D. Dajnak, S. Beevers, M. Williams, P. Watkiss and A. Hunt, Understanding the Health Impacts of Air Pollution in London written for Transport for London and the Greater London Authority.</p> <p><a href="http://www.kcl.ac.uk/lsm/research/divisions/aes/research/ERG/researchprojects/HIAinLondonKingsReport14072015final.pdf">http://www.kcl.ac.uk/lsm/research/divisions/aes/research/ERG/researchprojects/HIAinLondonKingsReport14072015final.pdf</a></p>	Refer to point 1 of officer's comments

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	<p>[2] K. Kelly and J. Fusell, Air pollution and public health: emergin hazards and improved understanding of risk, Environ Geochem Health 2015 37: 631.</p> <p><a href="http://link.springer.com/article/10.1007/s10653-015-9720-1?wt_mc=email.event.1">http://link.springer.com/article/10.1007/s10653-015-9720-1?wt_mc=email.event.1</a>. SEM.ArticleAuthorAssignedToIssue1</p> <p>[3] Department for Environment Food and Rural Affairs, Improving air quality in the UK, tackling nitrogen dioxide in our towns and cities, December 2015,</p> <p><a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/486636/aq-plan-2015-overview-document.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/486636/aq-plan-2015-overview-document.pdf</a></p>	
132	<p>This tax is deeply unfair. Owners of diesel cars purchased them as they were viewed as more environmentally friendly. Now this thinking is viewed as incorrect, the prices of these vehicles have plummeted.</p> <p>To further compound this loss, the council wishes to further penalise us with a tax which bears no reflection as to the amount of pollution a vehicle causes. Our car is never used during the week, and drives very few miles in Wimbledon. A heavily polluting bus or delivery vehicle goes untaxed, as does an identical vehicle parked off street.</p> <p>If you need to raise more tax, please find a fairer way. for example, a permit application could be accompanied by an MOT certificate which shows how many miles have been driven in any year, and the tax applied proportionately.</p> <p>Either way this appears to be an unfair revenue raising opportunity which punishes unfortunate residents, rather than acting in our interests.</p>	Refer to points 2,5,6 & 10 of officer's comments
133	<p>Whilst I comprehend the reasons that the Cabinet has put forward for the imposition of a levy on the resident parking permit for diesel cars I object to its imposition at such short notice and would ask that it be introduced in 2017/8. It is disingenuous to say that other councils have imposed a similar levy without any indication of the amount they are charging, which I understand is usually considerably less than Merton plans to charge. I believe that the level of levy indicates that Merton is using this as a revenue raiser, which they are not allowed to do</p>	Refer to points 1,6,& 13 of officer's comments
134	<p>I am writing in connection with the Council's plan is to introduce a levy charge for all diesel vehicles that have a Resident, Business or Trade parking permit with the introduction of £150 levy phased over a 3 year period - £90 in 2017/18, £115 in 2018/19 and £150 in 2019/20.</p> <p>My wife and I strongly object to this proposal and urge the Council to reverse the decision. We have a diesel car and were encouraged to buy it by the Government as the consensus a few years ago was that diesel cars are greener as they are much more fuel efficient than petrol cars. Government policy has not changed yet the Council is proposing to do something now that goes against what we were all encouraged to do. The proposed flat rate approach is grossly unfair as smaller more efficient vehicles will be charged the same as bigger more inefficient and dirtier vehicles.</p> <p>Also this is effectively a penalty on those residents who live in a CPZ and do not have access to private land to</p>	Refer to points 2,3,4,5 & 6 of officer's comments

	<p>park their vehicles. In the latter case neighbours with diesel cars but one of whom can park on their drive and one who does not have access to private parking will be treated differently even though they both drive diesel cars which the Council believes pollute. Also if you have a diesel car but do not live in a CPZ you will escape the levy. Again this is very inconsistent and unfair. For these reasons we object to the proposal.</p>	
135	<p>This hasn't been thought through. The public have, over the past decade or so, been acquiring diesel vehicles on the basis of advice provided by the government. The government is now saying they got it wrong. It isn't financially feasible to change cars so quickly (how long ago was it officially declared 'wrong' to own a diesel car?), and many of the residents who the council are employed to represent won't be able to do so.</p> <p>It seems to me that rather than charging those who took the advice provided, the government should probably be providing financial assistance to those who were wrongly advised in the first place to make switching to a more environmentally friendly alternative a possibility.</p> <p>Whilst I accept this might not be realistic, I do NOT accept that those who have based a decision on advice provided should be penalised for erroneous advice previously provided.</p> <p>Personally, I am fortunate enough to be able to stomach this charge without seeing a significant detrimental effect to my life, but many residents won't be. I would appreciate a response explaining the "thought process" if there has been one.</p>	Refer to points 1 & 2 of officer's comments
136	<p>I feel that as the Labour Leader you are out of order with a levy on diesel re parking permits the increase is massive and affects the working class. Van drivers Mini Cabs the poor in our community that can only afford old diesel cars. Labours Mr Gordon Brown told us to buy diesel now you wish to punish us as does our new Labour Mayor. What you are doing is not fair if you reply re fumes kill people so does well done toast. Fact is so called experts wish to get taxpayers money to fund them. you are using their nonsenses to unfairly tax Residents. Parked cars do not give out fumes.</p>	Refer to points 1 & 2 of officer's comments
137	<p>Thank you for you reply. I note that you stated that the 9000 people killed by diesel fumes is an estimated figure not an actual real figure. so would you have any proof of these deaths and how many have occurred in Merton. Over 8 million people live in London. You did not address the issue of taxing the poor, van driver, mini cabs, most of which are diesel. I agree with your statement about pollution but that was all you gave a statement with no facts. If the Mayor was worried about pollution why have a new year fire work display which causes a great deal of pollution. I think you don't have answers but do try to reply.</p>	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.
138	<p>I am a resident of Merton with 2 cars, one of them being diesel and both requiring parking permits. While I fully support a shift towards renewables and electric powered cars, I feel that this fee is unfair. Cars parked in ones own drive do not incur any penalty. Also, we use our cars only for school runs and weekends. As such our annual mileage is much lower than average.</p> <p>Charging this fee not based on NOx output also seems unfair. Its also unclear whether hybrids are counted as electric? Since there are few electric options out there none of them work for us as we have a large family and</p>	Refer to points 1 & 6 of officer's comments

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	<p>require a larger car. So at this time I would petition the Council to drop this diesel levy in its current form and investigate a fairer system.</p>	
139	<p>I write as Chairman of the Raynes Park and West Barnes Residents' Association. I understand that the Council is proposing to bring in a levy on diesel vehicles as early as this April, with a levy for parking permits and business permits, that is likely to increase in future years. Please take this e-mail into account in reply to the public consultation that you are (belatedly) undertaking.</p> <p>While I understand that modern research shows that such vehicles bring health issues, there does need to be a period of time for public education and during which people are able to change vehicles, otherwise the costs to them will be inordinate. Most people change their vehicles only every three years or so, and those who have recently bought such a vehicle will be heavily penalised, given the depreciation in value. If the proposal has merit, it should be introduced over a number of years. The proposal will also hit hardest those who are less well off, as they can ill afford to change their vehicle, simply to avoid extra costs.</p> <p>Further, there seems little evidence of such bad air pollution in Merton that it is vital to introduce this scheme at such speed. I trust that the Council will defer the introduction of the scheme at this time. Please acknowledge receipt.</p>	<p>Refer to point 1 of officer's comments</p> <p>There is no evidence that this policy will impact the less well off.</p> <p>Merton has historically and continues to exceed its air quality objectives</p>
140 Page 178	<p>I have only just found out about this proposal and wish to make a couple of points that I hope will help lead to a fairer implementation. I do not object to the principle of increased levies on diesel vehicles as one way to try to improve air quality. But I find the cost and the timescales for this are unjustly punitive to many people who will be simply unable to act upon this "encouragement" to move away from diesels in anything like the short timescales in which this proposal is to be introduced..</p> <p>I have a diesel vehicle. It is a company car provided to me under a 4 year lease. I have no way of changing this vehicle until the lease is expired. An extra £90 in the first year more than doubles the cost of my parking permit, rising thereafter, and I am therefore a hostage to these proposals, I have no alternative unless I either resign from my job or move house. It seems to me grossly unfair and draconian. As an aside, my commute is on public transport or bicycle already, so I, like many others, am doing what I can to contribute to a cleaner borough already.</p> <p>With your decision being made in November 2016 and an implementation date of April 2017, you are giving people little advance warning or time to make any changes before we are hit with this massive increase. How did you arrive at this rising fee structure? A starting point of 60% of the final levy seems to me to be an attempt purely at maximising the revenue you can make on this scheme in the coming financial year, rather than an equitable starting point for encouraging a long term change in behaviour and improving the air quality in the borough.</p> <p>A lower starting point, and a more gradual ramp up, would be a much fairer way of tackling the issues this is intended to address. Residents would be much more likely to actively embrace these kinds of behaviours rather than balk at the imposition of a harsh increase if this were to go ahead as it is.</p> <p>I strongly urge you to review the fee structure and the timing of this implementation before any final decision is</p>	<p>Refer to points 1 &amp; 6 of officer's comments</p>

	made, and to publish the rationale for the existing fee proposals.	
141	<p>I am responding to the Council's three-week consultation about the imposition of a levy on people owning diesel cars who live in CPZs and do not have driveways or other off-road parking. I oppose this measure for the following reasons.</p> <ol style="list-style-type: none"> <li>1. The measure is unfairly discriminatory against a restricted class of people who live in CPZs and do not have driveways or other off-street parking. As the "Cabinet" paper dated 7 November 2016 freely admits (para 2.6) it is only those who are unfortunate to live in CPZs over whom the Council has any power to impose measures to support their vague ant-pollution policy. The discrimination is not rational and is probably unlawful.</li> <li>2. It is an abuse of legislation intended to deal with parking congestion to use it to "nudge" an arbitrarily restricted class of people towards "behaviour" which has no direct connection with parking in one particular place within the borough rather than another.</li> <li>3. As the "Cabinet" paper (2.8) concedes "it is very difficult to define at what level a levy will directly influence a motorist's behaviour". People who have bought relatively expensive diesel cars, having been encouraged to do so because they reduced CO2 emissions, will not necessarily be able to afford to replace them within a few years at the whim of the Council. Although the levy will be onerous for many people the cost of buying a new car at the Council's nudge would be disproportionately more onerous, so they will have to put up with what they will suspect to be mainly a disguised revenue-raising exercise. The phased introduction is too short and too steep.</li> </ol> <p>I would add that this inadequately justified proposal, together with the short and poorly publicised consultation, seems to be another example of the contempt of the Council for the very people whom it is supposed to serve (and who pay for it). An earlier proposal for the introduction of a CPZ in Raynes Park had to be withdrawn when it was demonstrated that the consultation had been wholly inadequate.</p> <p>Because I have only just heard of this proposal I make this submission at a very late stage in the consultation period, just before its expiry. Please acknowledge receipt of this submission.</p>	Refer to points 1,5 & 6 of officer's comments
142	I am writing in support of the proposals for a diesel levy that funds incentives for reduction in local air-pollution.	Refer to point 13 of officer's comments
143	<p>Re. Diesel Levy - As a residents of this Borough, we would like to ask Merton Council to re-consider its decision to introduce a levy on certain categories of deisel-powered car owners. Actions in favour of clean air are of course wholly supported for both human health and the environment at large. The manner in which Merton Council is seeking to bring this about in the present scheme is unfortunately:</p> <ol style="list-style-type: none"> <li>1. Unfairly discriminatory in several ways and</li> <li>2. The intended improvement to clean air appears to be minimal.</li> </ol> <p>Specifically:</p>	Refer to points 1,2,3,5,6 & 10 of officer's comments

Unfairly discriminatory -

a) Within the Borough

It is unjustified to impose charges only on those diesel vehicles having a Residents', Business or Trade parking permit. Why is this?

If a levy is introduced, it should be on all diesel vehicles and their owners across the Borough.

a) How does the Council intend to capture a levy from diesel vehicles in transit through the Borough?

b) Higher levy cost compared to other Boroughs outside

Official sources indicate that Merton Council has pegged the levy rates relatively high compared to other Boroughs. Why is this? Again, if a levy is introduced, it should be done evenly across all districts on a national scale

c) Euro 6 emission standard vehicles

Car manufacturers now produce new diesel vehicles conforming to the Euro 6 standard. Has Merton Council considered the low level of NOx emission from these new vehicles? Their NOx level of modern diesel compares well with that for petrol-powered vehicles. This penalises excessively those who drive low polluting diesel vehicles. The levy does not reflect the differences between types of diesel efficiency.

d) Breach of good faith purchases

In the last few years, the government has incentivised drivers to purchase diesel vehicles through eg.lower taxation and public rhetoric. Petrol cars produce more CO emissions than diesel-fuelled vehicles and public policy focussed on this type of pollutant. Consequently, car manufacturers have greatly improved engine efficiency for diesel and diesel-powered vehicles and now, diesel vehicles consume less fuel per km. than petrol as well as producing less CO than their petrol counter-part. Vehicle owners have been encouraged over several years to purchase diesel power and done so in good faith. In a swift move, they are now penalised and it is outside most people's financial ability to purchase a different model (petrol or electric) quickly or at all, or even to support the levy.

2. Minimal effect on intended improvement of air quality

Has Merton Council considered the complex balance between NOx emission rates (the source of the diesel levy issue), CO emission rates, hydrocarbons and particulate matter and the discrepancies between fuel consumption efficiency? The picture is not at all clear that by itself, modern diesel-powered vehicles are greater air pollutants than petrol-powered cars (which still only need conform to Euro 5 for NOx emission).

What evidence is there of the individual quality type and levels of pollution reduction equation that will result?

Correspondingly, what evidence currently exists to show an overall enhancement to air quality following the specific measures the Council has decided upon?

Revision of diesel levy with regard to its measures and their process. The speed and discriminatory nature of the



	Council's vote is unfair and so partial as to limit useful findings. It appears too little consideration has been given to achieving a useful result and in the process will penalise those it has chosen to target. We urge the Council to re-think this action as part of its drive for clean air in the Borough.	
144	<p>I am writing to express my disagreement with the diesel levy that Merton Council is intending to impose on some of its residents. My objections are as follows:</p> <ul style="list-style-type: none"> <li>• It was a Labour Government that encouraged us to buy diesel cars because of their lower CO2 emissions. It is now a Labour Council that wants to punish some, but not all, of its diesel driving residents for the failure of a past Labour Government to understand the science of diesel engines. If central or local Government want to reduce the number of diesel cars on the road they should between them introduce a scrappage scheme.</li> <li>• Merton Council is seeking to levy a tax on those residents who do not have off-street parking and live in a CPZ. If the Council had a genuine desire to reduce the number of diesel cars in Merton it should devise a scheme which taxes all diesel cars registered to owners in Merton or introduce number plate recognition cameras to identify and tax those diesel car owners that actually drive in the borough rather than just park their cars in it.</li> <li>• The proposed diesel levy is just a cynical attempt to raise tax from a small segment of the population. The richest people in the borough who will live in properties with offstreet parking will not be taxed at all - where is the fairness in that? You are exempting the richest people in the borough from a tax - those are not the principles of the Labour Party.</li> <li>• If the proposed levy goes ahead you will presumably use the money so raised for the purpose of reducing vehicle emissions in the Borough.</li> </ul>	Refer to points 1,2,5 & 13 of officer's comments
145	What consideration if any has been given to diesel vehicles with emission cleansing technology that are cleaner than many petrol driven vehicles? Why are diesel vehicle owners in CPZ only being charged?	Refer to points 3 & 3 of officer's comments
146	<p>I object to the Council's proposal in administering the diesel levy through permits. My reasons for objecting include</p> <ol style="list-style-type: none"> <li>1. Cabinet decision - having read through the report which is devoid of any real justification, it states that a full consultation will be carried out to seek views of residents and stakeholders. I have been informed that no such consultation has been carried out. can it be explained as to who made the decision not to informally consult, why and where is this decision published. If this consultation was carried out, when and with whom</li> <li>2. The same report refers to a statutory obligation to consult under the Air quality Action plan. Has this been done and when. what was the outcome? If not, why not and under what authority was this decision taken.</li> <li>3. Financial implications within the report does not include cost of implementation, administration etc and above all, the income that would be generated. How much income does the Council believe this would generate. Why was this omitted from same the report. How will this be spent</li> <li>4. How exactly would this income be managed and a mere 'on air quality' does not suffice. At this stage the Council</li> </ol>	<p>Given the size and extent of the consultation area, it would have been unfeasible to do a newsletter drop to all properties within all CPZ zones.</p> <p>The statutory consultation was communicated from January 2017 by using the following methods :</p> <ul style="list-style-type: none"> <li>• On the council's website</li> <li>• Advertised in the Local Guardian and the London Gazette newspapers</li> <li>• Via leaflets and posters at libraries,</li> </ul>

must have a plan or programme. where are these published. how would expenditure be prioritised?

5. The report does not identify discrimination against owners of diesel vehicles. I put to you that not only are you discriminating against diesel car owners but against those who reside in controlled parking zones. There are many new diesel technology that are cleaner than some old petrol vehicles. so how can it be claimed that this is linked to air quality which the Council is determined to address as a matter of urgency. I therefore surmise that you are discriminating against diesel vehicle owners who reside in a CPZ.

6. The report refers to a fee of £25 for electric vehicles. There is no where in the report or within the published decision that refers to any specific permit holder with an electric vehicle. However, I have been advised that this only applies to residents but not business permits. However, the report refers to electric vehicles and not a specific permit, unlike the Diesel levy that the report clearly spells out which specific permit it applies to. Please explain why the Council is now distinguishing between various permit holders for electric vehicles. who made this decision and why. where was this published. under what power or authority is the Council making such distinction when it was not identified within the report and cabinet decision. This is a clear discrimination against businesses and how can this be linked with your objective of improving air quality, surely a resident with an electric car has the same impact as a business with an electric car.

7. I have also learnt that the levy does not apply to all permits such as teachers permit. why is that. Teachers are commuters and they should not have a permit any way but why are they exempt?

8. The Council claims that the levy is being administered as a matter of urgency. But this is not a reasonable explanation in response to not providing diesel car owners sufficient time to change their vehicles. Many will only realise the levy when they apply for their permits either new or renewal. How can anyone consider this to be fair and unreasonable.

9. I have been advised that one person will be making a final decision. How can this be. With such a high profile and discriminatory measure, why is the decision being made behind closed doors. where is the opportunity to debate and challenge the method of adoption and discrepancies.

10. The Council claims openness and transparency. Can you please explain what steps have been taken to demonstrate this statement

I look forward to a comprehensive explanation to the points I have raised. I do hope that I am not fogged off with a generic standard response.

I do appreciate that this representation is a few days late and wish for its consideration regardless. Reason for lateness is that I only just learned of the consultation

leisure centres and at Merton Link

- Via all ward councillors
- Via all known resident and business associations
- Via local radio station
- Via social media including several press releases

The consultation to introduce the diesel levy is separate to the Air Quality Action Plan, the levy is introduced as one of the measures that has been put forward as part of this plan; there is a duty to consult on the overall action plan which will be available for consultation in March. The AQAP would not be a mechanism to override the statutory obligation or as a method of overturning the levy.

Also refer to points 1, 3, 5, 12 & 13 of officer's comments

The Council will be introducing a reduction of £40 to Trade and Business permits with electric vehicles

The Council will be applying the levy to Teachers permits

The levy applies to applications from resident and businesses whose addresses are within Controlled Parking Zones

The decision to introduce this levy has been through Cabinet, Scrutiny and was 'called in' and at every stage it has

		been open to discussion and debate.
147	<p>I've just been told by my neighbour about this proposed levy as I have a Diesel car. This was news to me so I am disappointed the council did not write to me about this proposal. You did when you proposed changes to the CPZ a few years ago but strangely not for this issue. Please add my name to any list of those not in favour of the levy,</p> <p>My car is legal, passes all emission standards set by the Government and I do very few miles each year. How will taxing the residents of Merton with a parking permit levy change the air quality?. Will you be monitoring this? Have you studied who drives down Wimbledon Broadway i.e. permit holders vrs others, i doubt it. How will you manage non-Merton Diesel traffic?</p> <p>I'm sure you have heard these points and more before but if Diesel is that bad the Government should be managing this issue. This proposed levy is discriminatory. I think the council should be trying to improve traffic flow around the borough to reduce the amount of standing vehicles to minimize the impact of non-permit holding diesel traffic</p>	Refer to points 4,6 & 10 of officer's comments
148	<p>It is grossly unfair to attack diesel car owners who have bought their cars in response to recommendations from Government when they said diesel cars were less polluting than petrol cars. In any case most of the pollution comes from buses and lorries not cars. The same 'experts' who are saying diesel cars are causing the pollution are the same 'experts' who recommended the Government to push diesel vehicles. Why should we believe them now? You are just jumping on the a very unfair bandwagon in order to make money.</p>	Refer to point 2 of officer's comments
149	<p><u>The introduction of a diesel levy for all types of resident and business parking permits</u></p> <p>I refer to the "consultation" on the above matter which closed on the 3rd February 2017. Following my contact with the Council officials I was advised that my views would be considered if submitted by the 15th February 2017. The views expressed are not exhaustive given the time available to me.</p> <p>Addressing the issue of poor air quality is probably one of the most important factors within the modern age so it with great regret that I cannot support this proposal. I have outlined the reasons below.</p> <p>1) The has been no meaningful consultation regarding the introduction of this scheme. I only found out about this report after the close of the consultation. If you are going to raise parking permits by £90 to £150 it is only reasonable to contact those who face this charge and ask their opinion directly. If you were raising the council tax by this sort of amount a referendum would be needed. The issue of appropriate consultation has apparently been raised by the Overview and Scrutiny Committee who took the view 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". These views do not appear to have been taken into account. No time has been allowed for alternative arrangements to be made.</p> <p>2) The consultants note that " The scheme would benefit from additional public engagement prior to implementation to ensure that permit holders understand the justification for changes in the</p>	<p>Given the size and extent of the consultation area, it would have been unfeasible to do a newsletter drop to all properties within all CPZ zones.</p> <p>The statutory consultation was communicated from January 2017 by using the following methods :</p> <ul style="list-style-type: none"> <li>• On the council's website</li> <li>• Advertised in the Local Guardian and the London Gazette newspapers</li> <li>• Via leaflets and posters at libraries, leisure centres and at Merton Link</li> <li>• Via all ward councillors</li> <li>• Via all known resident and business associations</li> </ul>

<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 184</p>	<p>permit costs and are fully aware of the available opportunities for reducing emissions and minimising the personal impact of the levy" (Technical Report paragraph 3.3.3 ). This has not been carried out which in my view makes the whole scheme bereft of any legitimacy.</p> <p>3) This is a retrospective tax. People made their choices on information available at the time and are now being penalised even though they may have acted on the best available knowledge. It would be much more reasonable to introduce a scaled charge for new applicants.</p> <p>4) The scheme is crude. It is quite easy to determine emissions banding and charge accordingly. There should be a link between the amount charged, the age of the vehicle and the pollution produced.</p> <p>5) The scheme focuses wholly on those within CPZ. This is manifestly unfair. Many of those in CPZ live where they live because they are in easy reach of sustainable transport systems which they use regularly. They are therefore being penalised for doing the right thing. Those who live father from public transport are more likely to drive and therefore emit pollution more regularly. To miss these people out of the scheme is divisive and nonsensical. I find this approach most disconcerting as there is effectively no alternative in terms of infrastructure i.e. electric vehicle charging points and therefore no alternative apart from a petrol vehicle. Who is to say that a similar emissions scandal will not affect petrol cars in the future?</p> <p>6) The research is report is incomplete stating " It is very difficult to define at what level a levy 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." The suggested pricing structure is therefore arbitrary and not related to emissions at all.</p> <p>Given these points I invite the Council to reconsider the scheme taking forward the alternative option outlined in paragraph 3.2 i.e. " Adoption of a more thorough and complete emissions system taking into consideration petrol vehicles". Furthermore it is suggested that this is taken forward with full and detailed consultation with those affected. Note that I will be continuing my discussions regarding the consultation process for this report with your officers. Also, whilst I am happy for my comments to go into the public domain I require my name and address redacted.</p>	<ul style="list-style-type: none"> <li>• Via local radio station</li> <li>• Via social media including several press releases</li> </ul> <p>Also refer to points 1,2,3,4,&amp; 5 of officer's comments</p>
<p>150</p>	<p><u>Revision to parking fees for diesel vehicles</u></p> <p>I object to the proposed parking levy on all diesel vehicles. I am not the owner of a diesel car but I have a neighbour, who is very conscientious about air pollution, and changed his petrol car for a diesel model a few years ago on the government assurance that it was less polluting. Not only will he be penalised for following this government recommendation but he will find it more difficult to sell his car and replace it with a petrol or electric model and a parking levy will not help.</p> <p>Instead of being penalised he should now be offered compensation for having followed this false advice.</p> <p>Electric cars are now being recommended as being environmentally friendly, How long will it take the government to</p>	<p>Refer to point 2 of officer's comments</p> <p>Electric vehicles are charged through the normal electrical infrastructure which does not impact upon local street pollution, the main concern with regards air quality. We are aware that this pollution is off set but it does reduce local toxic pollutants caused by traffic.</p>

realise that the pollution level of a car depends not on its engine but upon the power supply used to charge its batteries. Is an electric car that is charged from a gas or oil fired power station environmentally friendly? How can you ensure that electric cars can only be recharged from wind farms or solar panels?	
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**Officer's response- point of reference to common themes raised within representations:**

**1. Timing of the charge and the consultation.**

The issue of poor air quality in London is now considered a priority; it has been described as a public health crisis by both the Mayor of London and in the Houses of Parliament as a Public Health Emergency. The government has also been successfully legally challenged by ClientEarth for failing to adhere to our air quality targets. As a result of this challenge all tiers of government are being challenged as to what steps they are taking to assist in improving air quality.

This has all given greater importance to air quality over the past year. Air quality is a health concern for our residents, visitors and particularly vulnerable groups, such as children and those suffering respiratory illnesses.

It is not simply a matter for central government to address, but all local and regional authorities to play their part, even if this includes difficult and controversial decisions. It is not an option to simply wait to introduce measures if the council is aware it is failing in its duties.

**2. The previous promotion of diesel by Government.**

It is true that in order to help reduce carbon emissions (CO<sub>2</sub>) successive central governments, and to a certain extent, local government did incentivise the use of diesel cars. It is now clear that this has had a significant impact on local toxic air pollution levels and even though it was previously incentivised, we cannot ignore the current health situation or the present move away from these types of vehicles.

Merton's current residential parking schemes are not linked to carbon emissions and did not incentivise diesel. However, in a situation which has been described as a public health crisis the council must use the mechanisms available to help tackle this problem. More recent scientific evidence has shown the significant contribution that diesel vehicles make to poor air quality. This is in addition to the well publicised difference between manufacturers reported and 'real life' emissions

### 3. **The reason for including all diesel vehicles.**

In the face of concerns over poor air quality the council decided to explore the residents parking permits system as a way of trying to influence a move away from more polluting vehicles. This is something well established in other boroughs.

Merton's original report proposed an emission based system which looked at all types of vehicles. However, throughout this process it was very clear that diesel cars were highlighted as those that were significantly more polluting.

It was decided that initially any new emissions charging system would focus specifically on the most polluting vehicles. It was also decided that this policy and its effectiveness would be carefully reviewed over the next two years. This review would also consider expanding the emissions charges to including other types of vehicle.

Whilst there is significant investment in the infrastructure required to incentivise electric vehicles there is a need to be pragmatic and phase this process in over a period of time.

As part of the review the removal of certain diesel vehicles which under certain Euro classifications purported to be less polluting was carefully considered. However, following the emission cheating scandal and in the light of the recent Department of Transport report, this clearly shows that even modern diesel vehicles produce on average 6 times the tested emissions when driven under real world scenarios, therefore there was a lack of confidence that these vehicles were cleaner.

There is a current move to introduce 'real world testing' of vehicles, when this is established the Council will consider reviewing the vehicle types subject to the charge.

### 4. **The 2 year review of the Levy**

As with any new charging mechanisms a local Authority is only able to make assumptions about their impact and how this will translate to the real world. To assess the impact of the new emissions levy the Council will look carefully at a number of areas including, but not limited to;

- the change in vehicles types associated with the CPZ's;
- impact on parking outside the CPZ's;
- any changes to off-road parking; and
- the reduction in emissions at the tailpipe.

Merton also intends to look at a wider more holistic emissions charging system that will potentially capture all types of vehicles including petrol, hybrids and electric.

## 5. The reason we are only applying this to parking permits in the CPZ's

The local authority has very few powers or regulatory controls it can use to try to change driver behaviour. The use of an emissions based parking system is the most significant. As legislation changes and the introduction of initiatives such as Clean Air Zones are promoted, the Council will consider using these to help in tackling other vehicles as they pass through the borough.

## 6. The level of charge including permit costs

Many boroughs operate a well-established emissions based resident parking system. In addition to these established charges, some local authorities have added an additional charge specifically aimed at diesel vehicles in recognition of their impact on poor air quality. Therefore, what would seem to be a high charge is not in relative terms when considering the overall cost of the permit.

London Borough of Merton has frozen the prices of all parking permits including resident, business, and trade parking permits and reduced visitor permits since 2010.

The levy fees for diesel vehicles will be phased over three years; this is equivalent of £1.73 per week for the first year, £2.21 per week for the second year and £2.88 per week for the third year. The first resident permit charge is £65, the 2nd resident permit charge is £110 and all subsequent resident permits are £140. The diesel levy will apply on top of the basic cost dependent on designation and if the resident permit is an initial application or renewal, see below

Permit	Initial application cost for one year	Renewal cost for one year	Initial application cost for 6 months	Renewal cost for 6 months
First residents permit	£90.00	£65.00	£57.50	£32.50
Second residents permit	£135.00	£110.00	£80.00	£55.00
Third residents permit	£165.00	£140.00	£95.00	£70.00

**7. Will this drive a change in behaviour?**

This is a nascent policy across London and therefore it is hard to evidence change in behaviour, hence Council's intention of a full review over the next 2 years. There is confidence that a levy will drive a change in behaviour and a reduction in diesel vehicles.

As well as adopting the principle of the 'polluter pays' the Council hopes that this new charge will incentivise borough residents to consider moving away from polluting vehicles, something that will be assessed within the review period.

The level of charge was debated very carefully as this should not be so low that it is simply absorbed into everyday motoring, but not too high that it is seen as 'punitive'. Consequently, the Council considers that the present level is appropriate to attempt to change behaviour.

Irrespective, any resources generated from the levy will be used for transport schemes and improvements in air quality.

**8. The principle of the polluter pays**

The 'polluters pay' principle is the commonly accepted practice that those who produce pollution should bear the costs of managing it to prevent damage to human health or the environment. This has underpinned policies and regulation for many years and should be applied to vehicles.

**9. Policy change and previous election promise.**

The Council is responding to the recent and emerging evidence regarding the impact of diesel vehicles on London and Merton roads.

**10. Tackling other vehicles in the borough e.g. buses, taxis and commercial vehicles & other initiatives**

The Council accepts that pollution in the borough is not solely due to residents in CPZ's and is aware that there is traffic passing through the borough and other residents contribute to this. There are a variety of initiatives aimed at tackling air pollution caused by freight traffic, buses and taxis, however very little legislation is in place specifically for the private car.

Given that diesel cars disproportionately contribute to poor air quality there is a need to address this issue through whatever mechanisms available. As other initiatives develop that will enable through traffic and other vehicles outside the CPZ's the Council will consider carefully how these can be employed to help reduce poor air quality.

It is, however, important to note that the Council has a number of programmes to tackle congestion and pollution. These include promoting healthier streets by improving cycling and walking provisions; improve public transport, car clubs, electric vehicle charging points, travel plans, parking management, works coordination, new developments etc.



The Mayor of London's ambition is to make London a zero carbon city by 2050. As a local authority Merton will be following Mayor of London's lead in improving air quality and consider initiatives such as the Toxicity charge which targets older and higher polluting diesel and petrol vehicles.

Merton will continue to work in partnership with TfL to implement other initiatives as

- Phasing out purchasing diesel buses by 2018
- Introduction of hybrids and electric buses
- Retrofit scheme outside central London by 2020

As of 2018 all new black taxis must be zero emission capable and given that these vehicles cannot be older than 8 years, the phasing of existing air polluters is inevitable.

#### **11. What action is being taken to manage the Council fleet?**

Merton's current fleet consists of 185 vehicles, of which the majority are currently diesel powered. The Council is in the process of reviewing the current use of vehicles across the Authority, and as part of that process is looking at the most appropriate fuel for each vehicle and task, with a view to moving away from diesel towards low emission and ultra low emission vehicles. To date a pool car has already been replaced with an electric vehicle and this programme will be expanded over the next 2 to 4 years. There are some vehicles where currently there is no viable alternative to the diesel engine. These are gradually being replaced with the latest low emissions engines (currently Euro 6). The Council will continue to monitor the development of new technologies and will look to adopt these where they prove suitable.

#### **12. Air Quality Action Plan**

There are thousands of deaths a year in London caused by poor air quality. The Council must take responsibility for the health of its residents including vulnerable groups such as those with existing breathing difficulties, the young and the elderly on which poor air quality will impact the most .

The Council has declared the whole borough as an Air Quality Management Area and, as such, has a legal duty to take action to tackle poor air quality. By not addressing this issue the Council could be viewed as failing to discharge its statutory obligations.

The Council is reviewing all of the measures that it can take as a local authority to address this problem, one of which is to incentivise those with parking permits away from the more polluting vehicles, in the same way as other authorities have. The Council will continue to review how it can influence all vehicles in the borough e.g. through non-residential parking, Clear Air Zones or lobbying GLA / TfL for cleaner public transport.

The Council is currently developing a new Air Quality Action Plan which will cover many of the measures, including anti idling legislation that the Council can take locally through planning and transport to deliver better air quality. It is hoped that this will be available for general consultation in March 2017.

**13. What will revenue be used for**

By law, any revenue generated from parking must be spent on transport related schemes. These include but are not limited to, traffic management and control schemes, road and infrastructure schemes and Concessionary Fares.

The Council is currently drafting a new Air Quality Action Plan which will contain the measures that a local authority can take to address poor air quality, this includes:

- improved monitoring arrangements
- borough fleet actions
- localised solutions
- delivery and freight servicing
- emissions control through the planning agenda
- cleaner transport and awareness campaigns.

**14. Consultation**

An informal consultation has not been carried out as the Council believes that the harm from poor air quality requires urgent attention and it is a statutory obligation for the Council to act. The statutory consultation has been carried out and given the level of representations received, it can be considered that the Council has succeeded in engaging with its residents.

To create a sustainable change in behaviour, the Council will be applying the levy incrementally over a 3 year period which it believes will allow sufficient time for residents to act. That is to say that the full charge of £150 levy will not be applied upon the first year of its introduction.

## Appendix B

### PETITION FROM COUNCILLOR HOLDEN – 165 SIGNATURES

#### Extract from SW19 website

Many residents' shock that Merton Labour will shortly be slapping a new tax on some diesel vehicle owners is entirely understandable. The council has done its very best not to publicise these plans until the eleventh hour.

Indeed the Labour administration even ignored the advice of its own consultants in deciding not to consult with residents on the potential impact of this levy BEFORE deciding to implement it. They are only consulting now because they are legally obliged to in order to amend all the traffic management orders.

By voting through an increase to the cost of parking permits for the owners of diesel vehicles in CPZs, Labour councillors have broken yet another of their 2014 election promises. Far from freezing the cost of permits until 2018, Merton's new levy will be considerably higher than other London boroughs leading to concerns this is predominantly a revenue-raising measure. Conservatives challenged this decision at a 'call in' meeting held last month. Of course we appreciate the need to reduce air pollution in the borough and support the principle that the polluter should pay. However, Merton Labour's proposal to hike up costs for diesel vehicles is a blunt instrument designed mainly to plug their own budget gap. There is little evidence it will actually help improve Merton's air quality and no guarantee that the extra money raised will be used for environmental or anti-pollution measures.

What it will do is unfairly penalise diesel vehicle owners - particularly in the west of the borough where the majority of CPZs are located - regardless of how much they actually drive their cars. Perversely it will hit hardest those on lower incomes who can't necessarily afford to upgrade their cars and also risks encouraging residents to concrete over front gardens to create more off street parking. By rushing this in very little notice, Labour councillors are once again treating captive residents as a cash cow to cover up their own financial mismanagement. That's why we have set up a petition to urge the administration to re-think its policy. I encourage all concerned residents to sign up at [www.surveymonkey.co.uk/r/mertondieseltax](http://www.surveymonkey.co.uk/r/mertondieseltax)

#### Survey Monkey Petition Prayer

We, as residents of Merton, petition the Council:

To abandon plans to introduce a Diesel Levy in April 2017, which is a punitive and unfair tax that entraps innocent residents in CPZ's who have no access to off-street parking and never envisaged such a change to the terms of the parking permits.

We think the Council should concentrate their efforts on other more effective methods to reduce air pollution in the Borough, and, to honour their 2014 pledge to not increase the cost of parking in Merton."

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