

Committee: Cabinet

Date: 15 July 2019

Wards: All

Subject: Public health, air quality and sustainable transport - a strategic approach to parking charges 4

Lead officers: Chris Lee, Director of Environment & Regeneration
Dagmar Zeuner, Director of Public Health-Merton

Lead members: Cllr Martin Whelton Regeneration, Housing and Transport
Cllr Tobin Byers (Cabinet member for Adult Social Care, Health and the Environment)

Contact officer: Ben Stephens, Head of Parking Services

1. RECOMMENDATIONS: CABINET

- 1.1. Members consider the responses made during the formal consultation process alongside any further references and considerations raised by the Sustainable Communities Overview and Scrutiny Panel.
- 1.2. Further to the consultation process, Members agree to the proposed charges set out in appendix 7 of this report including the following amendments
 - (i) Controlled Parking Zones: VNE, VNS, VN, VQ, VSW, VSW1, and VSW2, be re-categorised from Tier 1 to Tier 2 (as set out in Appendices 7 d & e)
 - (ii) That off street car parking charges in Queens Road Wimbledon and St Georges car park are reduced from the current £3 flat rate fee from 6.00pm to 11 pm to a £2 flat fee (as set out in Appendix 7 b).
 - (iii) The proposed charges for on street parking in appendix 7 (a) are approved.
 - (iv) The proposed charges for off street parking in appendix 7 (b) are approved.
 - (v) The proposed charges for Permits set out in appendix 7 (c-f) are approved.
- 1.3. Members agree to delegate authority to the Director of Environment and Regeneration, in consultation with the Cabinet Member for Regeneration, Housing and Transport, to finalise any operational matters in relation to the implementation of the proposals set out in the report.
- 1.4. To introduce the changes with effect from 1st September 2019, or as soon as practicable thereafter.

2. OVERVIEW

- 2.1. Merton is not prepared to ignore its responsibilities to deliver cleaner local air at a time when the current situation has been described as a global public health emergency. We are delivering a new Air Quality Action Plan that is ambitious in its aims and already demonstrates that we as an authority will use all of the powers available to us, not only to challenge and tackle this problem; but also to work towards delivering our legal responsibilities to protect the public.
- 2.2. The council recognises the part that it has to play in developing and delivering a framework to tackle air quality, demand for parking, and congestion in the borough. It does not stand alone on these issues. All of the other London boroughs are seeking to implement new parking policies to tackle similar problems.
- 2.3. There are very few direct levers available to stimulate a change in driver behaviour, and the council believes that the rationale for setting the new parking charges is about giving people the right nudge and opportunity to make different choices.
- 2.4. From November 2018 through to January 2019, Cabinet considered and agreed a series of reports setting out its approach to Public Health, air quality and sustainable transport – a strategic approach to parking charges. These reports set out the key strategic drivers that will affect parking policy for the future.
- 2.5. Then, and now, Members are requested to exercise their statutory duty to secure the expeditious, convenient and safe movement of traffic, and the provision of suitable and adequate parking facilities in the context of the public health agenda. This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.
- 2.6. This report supports the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.
- 2.7. The report explains the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by '**making the healthy choice the easy choice**'.
- 2.8. In setting out its measures of success, the new charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident

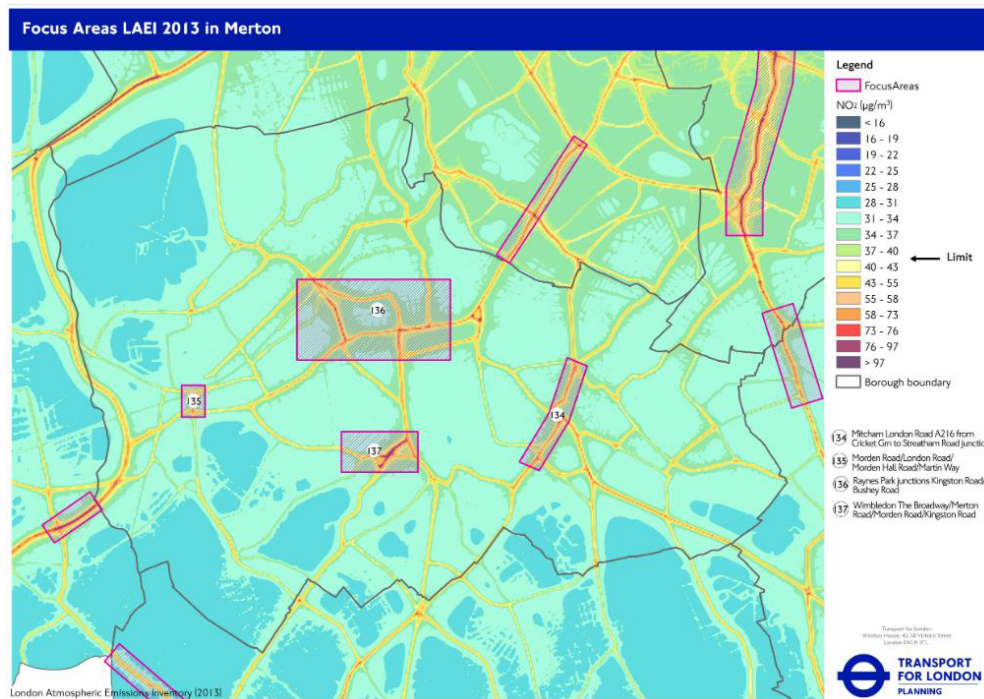
permits and lead to a rebalancing of our streets - to benefit residents and businesses alike.

- 2.9. In January 2019, Cabinet agreed to undertake a borough wide focussed consultation process to seek views on the underlying principles of the review and the proposed new charging structures. The details relating to the consultation process are set out in Section 9 of the report and the comments/detailed responses are set out in Appendices 1, 2, 3.
- 2.10. The purpose of this report is to reiterate the policy framework to support improved public health, air quality and sustainable transport across the Borough. To inform Members of the feedback received from the consultation exercise, to consider the council's rationale for amending its approach to parking charges, and finally to consider any proposed changes for consideration and agreement.
- 2.11. Local authorities are not permitted to use parking charges solely to raise income. When setting charges, we must instead focus on how the charges will contribute to delivering the Council's traffic management and other policy objectives.

3. THE CHALLENGE

- 3.1. We know that over 9,000 Londoners die a premature death through poor air quality. This issue has risen significantly in prominence and importance, where hardly a day goes by without a new article or scheme being proposed. Councils up and down the land are seeking new and bold solutions to what is a huge challenge.
- 3.2. The Mayor for London Sadiq Khan has rightfully placed growth, healthy people and places as the central theme of his adopted Transport Strategy. Merton Council is supportive of the strategy and in particular the adoption of healthy streets indicators when designing public realm improvements to make London's streets healthier places where people can be encouraged to choose walking and cycling as their choice of travel.
- 3.3. The Merton parking service already actively contributes to; and helps deliver the key policies set out in: Merton's Health and Wellbeing Strategy; Merton's Air Quality Action Plan; the Council's Local Implementation Plan; delivering the Governments' carbon reduction targets and the Mayor of London's Transport Strategy.
- 3.4. The London Borough of Merton historically and presently, continues to exceed targets and its legal objectives for local air pollution, including Nitrogen Dioxide (NO₂). The Government, local authorities and policy makers are being continuously challenged around delivering their responsibilities to reduce pollution, and are often criticised for lack of action or being slow to respond.

3.5. Air quality has been identified as a priority both nationally and within London, where pollution levels continue to exceed both EU limit values and UK air quality standards. Pollution concentrations in Merton continue to breach the legally binding air quality limits for both Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀). The air quality-monitoring network, run by Merton, has shown that the UK annual mean NO₂ objective (40µg/m³) continues to be breached at a number of locations across the borough including Colliers Wood, Morden, Tooting and South Wimbledon. In some locations, the NO₂ concentration is also in excess of the UK 1-hour air quality objective, which indicates a risk not only to people living in that area but also for those working or visiting the area. Reducing vehicle numbers (car usage) and different types of vehicle has a direct and tangible benefit on air quality.



- 3.6. In Merton, an Air Quality Management Area (AQMA) has been declared for the whole borough with four locations identified as having high levels of pollution and human exposure. These are in the main centres of Mitcham, Morden, Raynes Park and Wimbledon.
- 3.7. Poor air quality in Merton comes from a number of sources, but our legal exceedances are almost entirely due to road transport. Road transport accounts for approximately 60% of emissions of NO₂ in our borough. Simply put, this is due to traffic including the nature of vehicles on our roads, the volume of vehicles and the number of trips that they take.
- 3.8. By widening the difference in charges between electric vehicles and diesel cars, the proposed charges in part assist in the borough's response to climate change mitigation.

- 3.9. The latest evidence from the intergovernmental panel on climate change (IPCC) [1], and the Committee on Climate Change [2] suggests that deeper and faster cuts are needed to avoid irreversible damaging effects of climate change than in carbon dioxide (CO₂) previously thought. The Mayor of London's updated London Environment Strategy [3] already commits London to being a zero-carbon city by 2050, which goes beyond national requirements [4]. Climate groups have asked local authorities to declare a Climate Emergency and commit a target date to become carbon neutral. A number have already set ambitious decarbonisation targets and are developing their action plans.
- 3.10. There are approximately 88,000 vehicles registered in Merton, with 68% of households owning at least one car or van [5]. To achieve carbon neutral transport, Merton's residents would need to nearly eliminate the use of petrol and diesel cars by drastically reducing car journeys and switching to ultra-low emission vehicles such as electric vehicles. Most actions that support the council's aims to reduce air pollution from vehicles in transport and improve public health (e.g. encouraging increased walking and cycling) also reduce greenhouse gas emissions.

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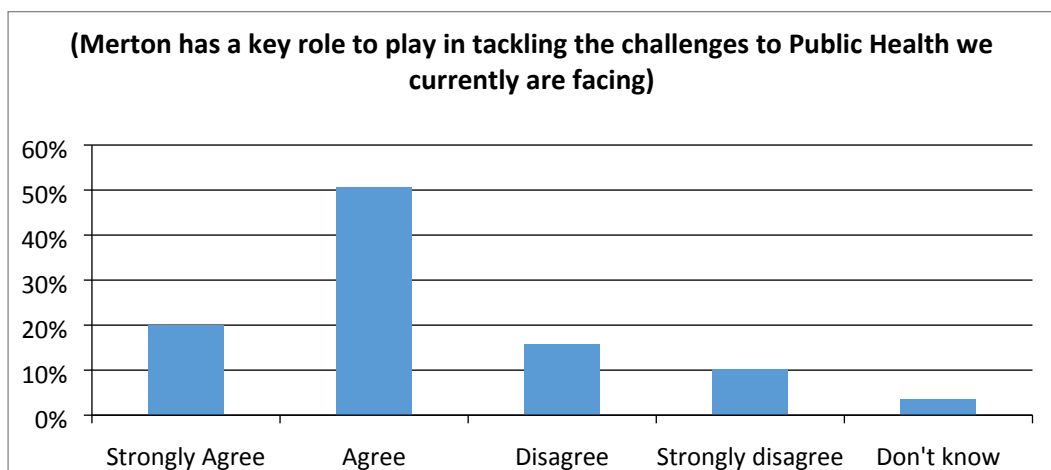
PUBLIC HEALTH

- 3.11. Public Health has a vision to protect and improve physical and mental health outcomes for the whole population in Merton throughout the life course, and to reduce health inequalities
- 3.12. The overall approach to achieving this vision is set out in the Merton Health and Wellbeing Strategy, which is produced by the Merton Health and Wellbeing Board. As explained in the last report to Cabinet, this strategy is being refreshed with a final version of the refreshed strategy expected to be approved by the Health and Wellbeing Board at its meeting on 25 June 2019.

¹ ¹ *List of sources*

1. ^[1] Intergovernmental Panel on Climate Change, Global Warming of 1.5 degrees, special report, October 2018 (<https://www.ipcc.ch/sr15/>)
2. Committee on Climate Change, Net-Zero, May 2019 (<https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/>)
3. ^[1] London Environment Strategy, May 2018 (<https://www.london.gov.uk/what-we-do/environment/london-environment-strategy>)
4. Climate Change Act, 2008, <https://www.legislation.gov.uk/ukpga/2008/27/contents>)
5. (source: VEH0105: Licensed vehicles by body type and local authority: United Kingdom)

- 3.13. Merton has a diverse and growing population. In 2018, Merton had an estimated resident population of 209,400, which is projected to increase by about 3.9% to 217,500 by 2025. The age profile is predicted to shift over this time, with notable growth in the proportions of older people (65 years and older) and a decline in the 0-4-year-old population.
- 3.14. Although current levels of health in Merton are similar or better to London and national averages, forecasts of current trends suggest, increasing burdens from obesity and diabetes and ongoing concerns about diseases related to poor air quality.
- 3.15. The essence of the public health argument for the proposed changes to parking charges are that they will encourage less car use, which in turn reduces two major risks to health: air pollution and sedentary behaviour.
- 3.16. The benefits to health of these reductions in health risks were detailed in the last report to Cabinet. In summary these are:
- Less air pollution. Poor air quality causes respiratory and cardiovascular disease, and the latest evidence shows effects on the brain hastening dementia and cognitive impairment in children.
 - Less sedentary behaviour. From a public health point of view, there is a strong argument for urgent and substantial action. Diabetes in Merton is increasing by about 2% per year, and it is estimated that 90% of new cases are potentially preventable. One in five children entering reception are currently overweight or obese, a figure which increases to one in three leaving primary school in Year 6. Almost 60% of Merton adults are overweight.
 - Healthy places: The 'healthy streets' approach defines a healthy street as one with things to see and do; places to stop and rest; shade and shelter; clean air; and pedestrians from all walks of life. Parking policy has its part to play alongside changes to the built environment to create healthy streets
- 3.17. The graph below is the response from the recent consultation specifically asking if Merton has a key role to play in tackling the challenges to public health we are currently facing.



- 3.18. It is clear from the response shown that over 70% of respondents agree/strongly agree that the Council has a key role to play in tackling the challenges to public health.
- 3.19. Parking policy has the potential to shape and define public health benefits. Improving air quality is important because 6.5% of mortality in Merton is attributable to poor air quality.
<https://fingertips.phe.org.uk/search/air%20pollution#page/0/gid/1/pat/6/par/E12000007/ati/101/are/E09000002/iid/30101/age/230/sex/4>

SUSTAINABLE ACTIVE TRAVEL

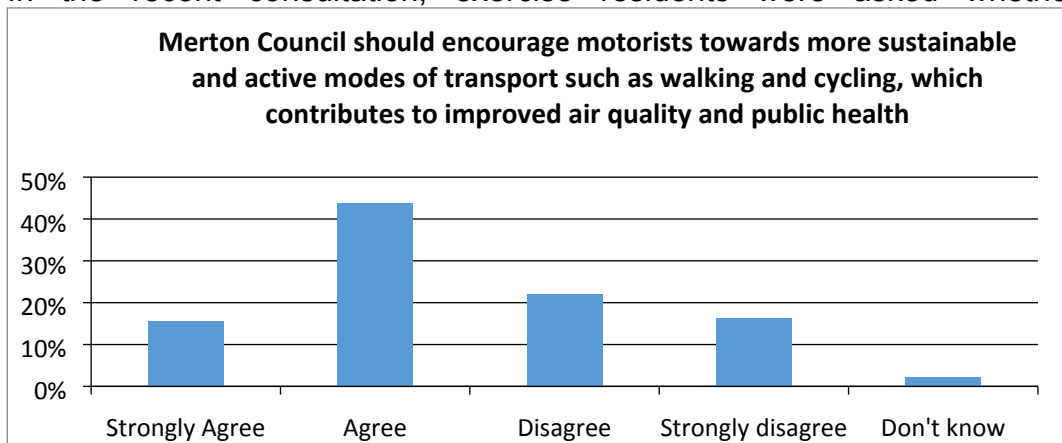
- 3.20. To get more people active, reduce air pollution and to promote healthier lifestyles the council intends to make walking and cycling the easy and preferred choice through the delivery of improved walking and cycling facilities.
- 3.21. In order to meet the Mayors Transport Strategy and to encourage more active travel, each London Borough is required to produce a Local Implementation Plan to focus on delivering tangible walking and cycling improvements. This approach aligns with the London Mayor’s aim that “Londoners do at least the 20 minutes of active travel they need to stay healthy each day” and Transport for London’s (TfL), Healthy Streets approach.
- 3.22. The third Local Implementation Plan (LIP) which is due to be published in the summer, sets out Merton’s Council’s three-year delivery programme for the period 2019/20 to 2020/22.
- 3.23. Over the last 6 years, Merton Council has spent £19.2m on a number of LIP 1 & 2 projects. This includes £4m on cycle related schemes (including cycle training). Approximately 6 km of cycle routes have been delivered alongside 651 additional cycle parking spaces.
- 3.24. The LIP 3 programme is set against a background of predicted employment, population and freight growth and; the demands it places on an increasingly congested transport system and the need to lessen and minimise the impacts on the environment and air quality. The consultation for this document

finished in May 2019 and the findings will be made available in the summer. LIP 3 contains a series of actions through to 2041.

These include:

- Reducing the impacts of climate change and improve local air quality.
- Improving connectivity and whole journey experience to the public transport network, especially for people with restricted mobility to support a more inclusive society.
- Reducing health inequalities
- Making Merton a safer place by reducing the number of collisions on our streets and supporting the Mayor's Vision Zero objective.
- Supporting good growth, especially around the town centres at Colliers Wood and South Wimbledon, Morden and Wimbledon.
- Redefining the way our streets are laid out and used, to encourage the take-up of more active and healthier lifestyles where people feel confident to walk and cycle safely.

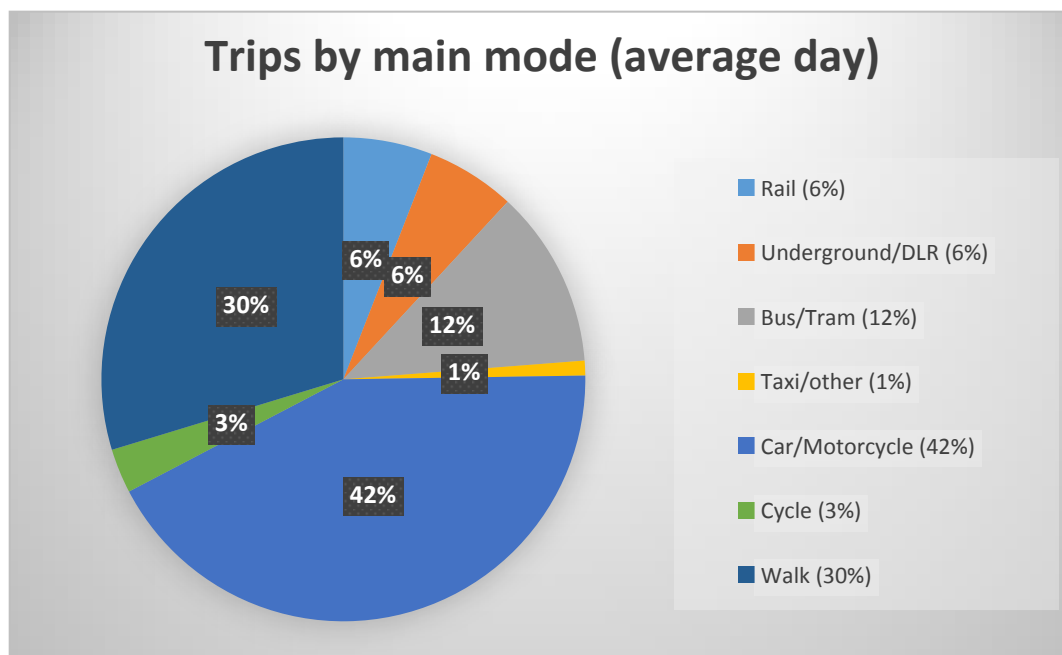
3.25. In the recent consultation, exercise residents were asked whether:



3.26. Just over half (60%) agreed that Merton Council should encourage motorists towards more sustainable and active modes of transport such as walking and cycling, which contributes to improved air quality and public health with (38%) disagreeing. Non-car owners were much more likely to agree (73%).

3.27. In Merton the modal share of walking, cycling and public transport is around 58 percent showing a worrying falling trend compared to previous years (down from 61%) and is just below the London average of 62.1% (source-Travel in London report 10).

3.28. All trips per day by main mode 2014/15 to 2016/17 are shown in the chart below:



- 3.29. In order to meet its share of the Mayor's 80 percent modal target, set at 73 percent for Merton it will be necessary to not only reverse the present trend, but to maintain a year on year increase in sustainable transport modal share. The level of physical activity has also declined in recent years from 38 percent of residents doing at least two x 10 minutes of active travel a day in 2013/14 to 2015/16 to 36 percent in 2014/15 to 2016/17. Furthermore, based on Department for Transport (DfT) statistics for 2016/17 the proportion of adults doing any walking or cycling once a week is 77.9% down from 81.5% for 2015/16.
- 3.30. Over one third of all car trips made by London residents could be walked in up to 25 minutes.
- 3.31. Although the level of cycling is broadly static, there remains significant potential to expand cycling (209,000 cycle trips or one per resident). However, only around 6% of these trips are currently achieved. A significant proportion of these potential cycle trips are undertaken by car, in particular trips to and from town centres, which coincides with the areas of poorest road safety for walking and cycling.
- 3.32. Merton is aiming to ensure that every resident has access to car club vehicles. There are 193,500 car club members in London and around ten car clubs. Transport for London (TfL) has committed to aiming for one million members by 2025. They offer a convenient and affordable service, while at the same time reducing overall car usage.
- 3.33. Car clubs can provide you with an alternative means of accessing a car when you need one, without all the cost or hassle of owning one yourself. You can find car club cars parked on street throughout Merton.

There are three car club companies available to the public in the borough, Bluecity, Zipcar and other TfL operators. There are currently on average over 60 vehicles operating in Merton with over 6,000 members.

- 3.34. The council is also developing its infrastructure for electric vehicles. Merton's ambition by 2021/22 is to facilitate 125 electric charge vehicle points across the borough, including fast, rapid and residential charge points. There are currently 94 in operation.

4. KEY THEMES HIGHLIGHTED IN THE CONSULTATION.

- 4.1. There are a number of key themes that reflect the responses received, following the consultation. This section of the report seeks to address the main points raised. A copy of the detailed consultation results and feedback can be found in Appendices 1-3.

Parking Demand and Supply

- 4.2. A number of comments and feedback suggested that there was no evidence to demonstrate that raising parking charges would reduce car use and lead to improved air quality. The council believes that there is evidence to show that the level of parking charges is likely to stimulate or nudge people into reducing car usage or removing their reliance on needing a car altogether.
- 4.3. The basic law of demand and supply states that more will be demanded at a lower price than that of a higher price. Parking charges have long been used to manage and regulate kerbside activity and provision.
- 4.4. The Canadian Parking Association produced a paper in 2015 titled The Value of Parking that looked at examples from a number of countries. This covers a wide range of points relating to the elasticity of demand for parking and the impact of fees on parking behaviour. The paper is available to read online at <https://canadianparking.ca/the-value-of-parking/>
- 4.5. Key points from the paper include:
- “The importance of parking is widely recognised, but car drivers are reluctant to pay even a small amount of money for parking.”
 - Parking fees are an efficient way of regulating parking. Offering free parking will lead to undesirable effects. The pivotal point in this is the low elasticity of parking demand. Even though parking demand in general is inelastic (meaning that the percentage change in parking demand will be smaller than the percentage change in parking fees) there is still an unequivocal link that increased charges will lead to a reduced demand, even if this is not proportional.
 - Previous reports on price have tended to concentrate on commuter parking only, which has a higher rate of inelasticity. Only a minority of people who use commuter parking facilities would consider alternative forms of transport or not making the trip at all.

- The report goes on to explain that there is also a difference in price elasticity between short and long-term effects. Car owners can adapt their long-term behaviour more easily than changing their habits on short-term notice. Long-term effects then can be more elastic than short time effects.
 - The report demonstrates that price elasticity for parking demand is strongly connected to the value that the car driver puts on certain types of trips (cross-elasticity). Highly valued trips will still take place, even when the price is high (low elasticity). When the value of a trip is considered lower, a driver may sooner skip the trip or find another solution (higher elasticity). Trips for dining out, recreation and unplanned shopping are likely to benefit from the nudge effect of stimulating drivers to change or amend their behaviours. Emergency trips, by their very nature, are unexpected and likely to account for a small number of overall trips made each day.
- 4.6. This latter point is illustrated in the following example where price increases led to a change in behaviour:
- *Congestion charge in central Stockholm – Findings indicate that the congestion tax in central Stockholm reduced ambient air pollution by 5 to 10 percent. This policy-induced change in pollution has been associated with a significant reduction in the rate of urgent care visits for asthma among children 0 to 5 years of age. Our estimates show that permanent reductions in air pollution from automobiles, even in locations, which have average pollution levels well below the current EPA standards, can have significant positive effects on children’s respiratory health.*
- Emilia Simeonova & Janet Currie & Peter Nilsson & Reed Walker, 2018. "Congestion Pricing, Air Pollution and Children’s Health," NBER Working Papers 24410, National Bureau of Economic Research, Inc.*
- 4.7. Further examples of where increased charges has stimulated direct behavioural change include:
- London Congestion Charge – The congestion charge was the first of its kind in the world. There was no evidence to prove it would be effective prior to its introduction, however its value and effectiveness have been scrutinised since. We know that in the first six months of operation of the charge, 60,000 less vehicle movements were recorded.
 - ULEZ – Since February 2017, when the Mayor announced the introduction of the T- charge as a stepping stone for the ULEZ, there has been a reduction in the total number of vehicles seen in the Central London ULEZ Zone (around 11,000 fewer vehicles per day)
- 4.8. Parking Fees an Economic Perspective – A further paper on the impact of parking charges and behaviour

<http://www.sciedu.ca/journal/index.php/ijba/article/viewFile/6626/3948> talks about the complementary relationship between vehicle parking, increases in parking fees and their proportionality in controlling vehicle growth rates and demand.

Key points include:

- Increased parking fees will lead to the desire to reduce private car travel, prompting people to choose alternative forms of travel
- If travellers expect higher parking fees they will change their route, or use other means of transport to reach their destinations.

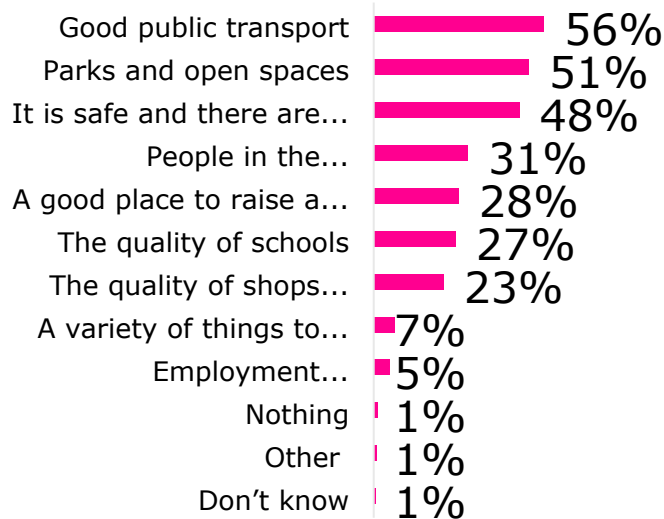
4.9. A comprehensive 2018 policy report by London Councils '**Benefits of Parking Management** in London August 2018' addressed many of these key principles. <https://www.londoncouncils.gov.uk/node/34485> The report stated that:

- Parking management is the only mechanism through which local authorities can ensure stationary vehicles are parked in an amenable and equitable manner, thus solidifying its importance and the benefit it delivers.
- There are many parking management benefits, which include reducing congestion, improving air quality, providing funding for parking and wider transport scheme improvements and ensuring good access and accessibility.
- Of particular significance is the fact that these benefits deliver benefit to everybody, from motorists themselves to the person sat at home, and all road users and non-road users in between.

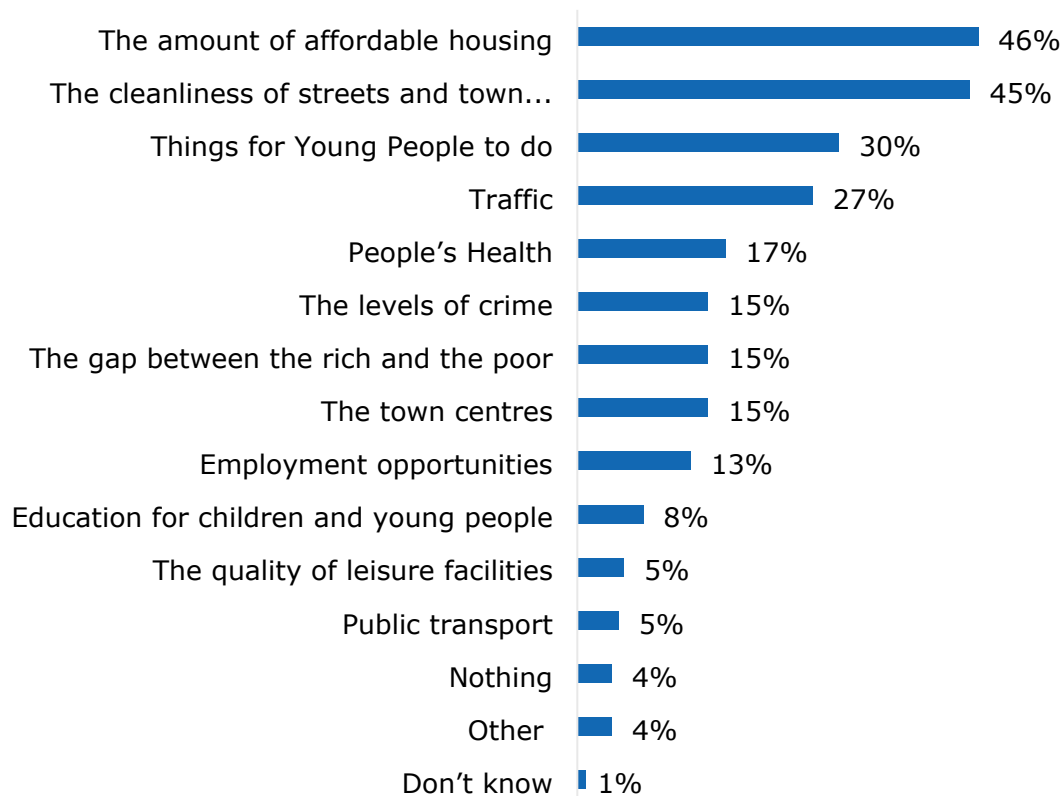
Public Transport Accessibility Levels (PTAL)

- 4.10. In cases where there is a reasonable opportunity to use public transport, or indeed walk or cycle, Merton's aim is to encourage everyone to use these options over the use of a motor vehicle. Generally, charges have been set higher where there is good transport links over less well-served areas. This is applicable to the proposed charges in CPZs, on street and in our car parks.
- 4.11. There is a significant difference in transport infrastructure and accessibility depending on where a resident lives, visits or works within the borough. This is presented in the form of a 'Public Transport Accessibility Levels' (PTAL) as set out by TfL and formed part of the review. TfL have grading's for each area of London – ranging from the highest to the lowest.
- 4.12. It is therefore easier in principle for a person living, visiting or commuting to a high PTAL rated area to use alternative sustainable of transport, compared to residents in low PTAL rated areas.
- 4.13. It should be noted many existing and new developments in high PTAL rated areas, are already car free, and a permit might not be purchased, and this forms part of the current planning process.

- 4.14. A recent residents survey highlighted public transport provision throughout the borough as most valued by residents.
- 4.15. All residents were asked to choose up to three things from a list, that they value the most in the London Borough of Merton. By far the most valued aspect of the borough is its public transport, with 56% choosing this. This is of greater importance to younger residents (61% aged 18-24 and 57% aged 25-44).



- 4.16. Following on from this, all residents were presented with another list and asked to specify which three they felt needed most improvement in the borough. It is encouraging to see that while public transport is the most valued aspect of the borough, only 5% of residents feel this is in need of improvement



- 4.17. Merton is very well connected to the public transport network with 10 mainline rail stations served by Thameslink (Wimbledon Loop), South Western Railway and Southern Rail services. A network of 28 bus routes also serves the borough; including 7 night buses, several of which run 24hrs a day.
- 4.18. Wimbledon Station serves as a sub-regional transport hub and is served by National Rail train services (South Western mainline), London Underground (District Line), London Trams and bus services. The suburban station at Mitcham Eastfields puts the east of the borough within 25 minutes of central London (Victoria and Blackfriars).
- 4.19. The Northern London Underground line also runs through the borough and terminates at Morden, (including a night-time service, which runs on Fridays and Saturdays every 8 minutes between Morden and Camden Town and approximately every 15 minutes from Camden Town to High Barnet/Edgware.
- 4.20. Following the consultation process the council has reviewed the PTAL rating for each CPZ and walking distances to main line, tram and underground stations access, and it is recommended that controlled parking zones VNE, VNS, VN, VQ, VSW, VSW1, VSW2, be re-categorised as Tier 2 from Tier 1. as shown in Appendices 7d - 7f.

Parked Cars

- 4.21. A number of respondents stated that parked cars do not pollute. No car is bought just to be parked; it is bought to be driven. How often and how far does vary, but it will be driven. The principle of charging based on location to public transport and local amenities is that it is easier to travel without the car on a day-to-day basis, than from locations with poorer access to amenities and public transport.

Through Traffic & Congestion

- 4.22. A number of representations highlighted a range of traffic and road safety issues/ concerns, often with a link to the likelihood of individuals choosing cycling and walking over the use of a car. The point was also made that through traffic as opposed to parked cars were the primary contributor to poor air quality. There were also comments about HGVs, Taxi's, buses and other transport being a contributor to the problem, and that the council should look to address these issues.
- 4.23. The council acknowledges there is no one simple solution to the growing problem of poor air quality and other transport related matters caused by increased car ownership and general traffic with the borough and London more widely. The council has a duty and we are addressing the many concerns in respect of 'other factors', which contribute to poor air quality and congestion.
- 4.24. The council will continue to lobby Government and work with TfL to reduce HGV emissions. The Mayor of London is taking action with the new Ultra Low Emission Zones, which has the ambition to push the change towards cleaner and less polluting vehicles as quickly as possible.
- 4.25. In order to nudge people towards active transport we must ensure our streets are safe. We will therefore embrace the Vision Zero targets to eliminate fatal and serious casualties by 2041 and are currently rolling out borough-wide 20 mph speed limit zones.

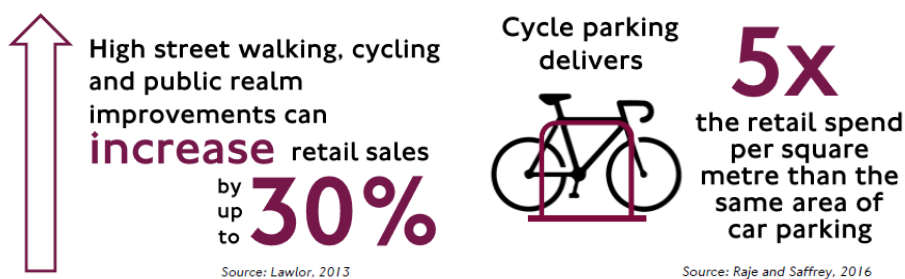
What is the income from parking charges used for?

- 4.26. The council can only spend the money it receives from parking charges in the manner set out in the Road Traffic Regulation Act 1984 (RTRA) which directs that income can be used for certain purposes only.
- 4.27. A number of the responses received questioned what parking revenue is spent on. The RTRA allows authorities to spend income on the day-to-day management of the parking service, to fund Freedom passes, transport related expenditure, environmental improvements, and maintenance and upgrades to carriageways and footpaths within the borough.
- 4.28. The Freedom Pass is London's concessionary travel scheme, which allows free travel for older and disabled people across London's entire public transport network and on local bus services across England during off-peak hours.

- 4.29. The benefit of the Freedom Pass is that it enables older and disabled people right across London to lead more active, happier and healthier lives, facilitating social inclusion and ensuring their continued participation in society. Parking management therefore plays a fundamentally important role in enabling this service to exist.
- 4.30. In 2016/17, the Freedom Pass cost London boroughs £355million. This cost is raised from parking revenue – both charges and penalties. This means that motorists are effectively subsidising the provisions that allow older and disabled people to get about London.
- 4.31. Over the last 3 years Merton has spent approximately £27m on freedom passes.

High street, business and town centre considerations

- 4.32. Further closures of familiar chains and primary department stores continue to be a concern for our high streets. Even with no significant increase in charges for approximately 10 years, alongside the introduction of 20-minute free bays, the impact of online shopping has changed the dynamics of the high street. This has also affected the night-time economy.
- 4.33. The council is mindful of these challenges and received written submissions from the business sector, including the Wimbledon Society and Love Wimbledon BID.
- 4.34. In order to assist businesses and support the night-time economy, the Council recommends a reduction in charges in the underused car parks of St Georges and Queens Road to a flat fee of £2 between 6pm and 11pm.
- 4.35. The council will also continue its commitment to the free twenty-minute parking bays.
- 4.36. Although there is a perceived risk that a reduction in cars to high streets will have a detrimental effect, a recent report by TfL (November 2018) demonstrates the economic benefits of walking and cycling.

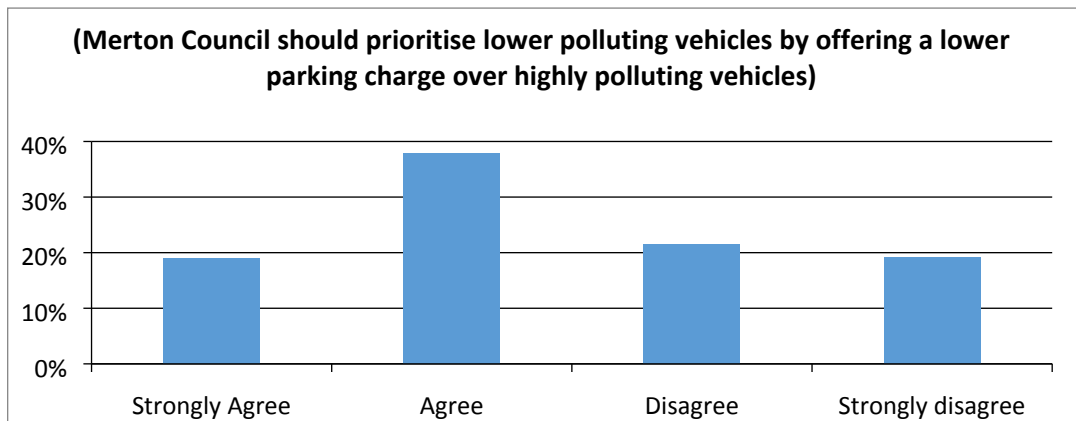


Emissions and Diesel Levy

- 4.37. The council has committed to reviewing the impact of the existing diesel levy and the potential for future emissions based charging within Merton. The report will be presented to Cabinet later this year and all of the comments received in the consultation will be considered in the future review.

- 4.38. Although emissions based charging is not being dealt with in this report, the Council notes the result from the consultation survey set out below.

Data from online survey results



Disabled and carer permits/drivers

- 4.39. Merton is committed to supporting its residents that have mobility issues, and there are a number of ways we currently support this objective.
- 4.40. Merton is a member of the national Blue Badge scheme. The Blue Badge provides a range of parking and other motoring concessions for people who are registered blind or have severe mobility problems. Blue Badge holders can park free of charge in any Merton disabled parking bay, pay & display and shared use bay or permit holder bay.
- 4.41. Later this year the Blue Badge eligibility scheme will be extended to those with a wide range of mental health issues that affect their mobility. This will extend our current provision to support additional residents within the Borough.
- 4.42. A Blue Badge holder in Merton is entitled to apply for a free carer permit under certain conditions. This is to further support those residents with mobility issues and in need of regular support and care. The carer permit eligibility is based on being a Blue Badge holder.

Charging Levels

- 4.43. Charges have been considered and set at levels, which will challenge driver behaviour and choices with the aim of reducing car use and ownership. The council is mindful of economic challenges facing many residents and visitors to the borough, but also needs to meet obligations to reduce poor levels of air quality and improve public health, increase cycling, walking and use of public transport. There have been no increases to parking charges for several years.
- 4.44. A large number of respondents felt that the proposed increased charges were too high. In addition, they were concerned that the charges when the CPZ was set up were initially just to cover costs but now appeared to be an

additional tax. A large number of respondents also highlighted that the proposed increased charges would have a big financial impact on them and that they could not afford to change their vehicle.

- 4.45. The new charges are considered a reasonable amount to nudge residents and visitors to consider their car use and alternative travel choices. For example, in the highest proposed CPZ permit charge area (£150) this equates to 41 pence per day. Over 70% of on street spaces are priced at £3 or under per hour.

5. PROPOSED NEW CHARGES

- 5.1. Like many outer London boroughs, the private car continues to take a leading role in meeting travel demand with around 43% of daily trips by car. There are currently around 88,000 vehicles in Merton or just over one vehicle per household. Car ownership has increased consistently over previous years.
- 5.2. Approximately 31.4% of households have no car (2014/15 -2016/17). Many roads are overcrowded during peak periods adding to air quality, noise and road safety concerns. In addition, annual vehicle kilometres travelled is also increasing.
- 5.3. A number of parking charges have evolved over the years and have met the needs for specific areas and schemes at a particular point in time. There were minor adjustments in 2015, but no significant review has been undertaken since before 2010. However, in this review the opportunity to further simplify the charges has been taken. Likewise, the proposals seek to further strengthen and develop the links between Public Health, air quality and how future charges can moderate parking behaviour.
- 5.4. Over the last 10 years where car parking and permit prices have been frozen the number of cars registered in Merton rose from 69,500 to 71,900. Whilst car ownership in the borough has started to decline over the last 12 months' overall car ownership has risen by approximately 3.3% over the last 10 years.
- 5.5. Future charging levels, that are too low, will not meet our future strategic objectives to improve public health and air quality, increase active travel and see the level of car ownership decrease.
- 5.6. The previous reports set out four basic principles, which set out the rationale that underpin the proposed charging structure:-
 - (i). Ease of access to public transport
 - (ii). Air Quality indicators
 - (iii). Parking demand and space availability
 - (iv). Enforcement requirements

(i) Ease of access to public transport:

5.7. In proposing the grouping and charge levels of each CPZ. Each CPZ was assessed against PTAL levels and as a guide, the criteria set out below:

- CPZs within 20 minutes' walk of an (1) underground **and** (2) mainline station and tram stop are in Tier 1.
- CPZs within 20-minute walk of (1) an underground **or** (2) mainline station are Tier 2.
- CPZs with no access to a mainline or an underground station within an approx. 20-minute walk are Tier 3.
- There are buses in many cases which complement access to train and tram provision within the borough.

(ii) Air Quality:

5.8. Merton's air quality levels are poor. A charging structure, that helps to change habits and car ownership throughout the borough, will have a beneficial medium to long-term effect. A number of hotspots coincide with areas of high parking demand and traffic movement. e.g. Wimbledon Town Centre. These focus areas align themselves with some of the more congested areas of the borough, and support the recommendations, which aim to address air quality issues.

(iii) Areas of high parking demand

5.9. Parking demand varies within the borough. Higher Charges are being proposed in areas of high demand to encourage the journey to be made either by walking, cycling or public transport, rather than by the use of a car.

(iv) Enforcement requirements

5.10. It is recommended to align charges with the hours of operation of the permit bays. For example, permits for a CPZ that are controlled for a shorter period, should cost less than permits for zones that are controlled for a longer period. There is a direct cost of enforcement, dependant on the length of time a scheme is operational. This is reflected in the proposed cost of a permit.

Proposed On Street charging structure

5.11. Based on the above criteria the summary table below shows the proposed charging structure. It is therefore recommended that on street parking be categorised into four broad zones as set out below.

Zone No.	No. of on Street Bays	Description	Air Quality focus area	PTAL level. Access to transport.	Parking demand
Zone 1	255	Wimbledon Town Centre – Primary Shopping zone, Broadway and Wimbledon Bridge & Hill	137	6b, a & 5	High >100
Zone1 a	120	Roads near/off High Street Wimbledon Village to serve as a reduced cost parking area, including The Causeway, South Side Common,		2 & 1	Medium/ High 71%-100%
Zone 2	2547	North of the Borough. Including Wimbledon Village, Wimbledon Park, South Wimbledon, Raynes Park. Colliers Wood,	Part 137	5, 4 & 3	Medium/ High 71%-100%
Zone 3	722	South including, Mitcham, Morden and other areas not specified.	Part 134, 135.	Morden Centre 5, Mitcham 4, Other areas, 3, 2, & 1	0-70% Lower demand

Zone 1 – On Street Parking

5.12. Wimbledon Town Centre has the highest demand for on-street parking in the borough, and greater stimulus will be necessary to manage this compared to on-street locations elsewhere within the Borough. A key issue has been identified at peak times, where vehicles wait for on-street spaces to be freed up, adding to congestion problems. Existing periods of maximum stay would be retained to further help manage turnover of spaces and reduce congestion. In this area, there are 255 bays where the higher charge of £4.50 per hour is applicable. This is in comparison to 3389 pay and display bays across the borough prices at £3 or below.

Zone 1 a – On Street Parking

5.13. There are no car parks in Wimbledon Village and therefore no obvious alternatives for customers to park anywhere other than at the kerbside. To facilitate parking in the vicinity, but off the high street itself, a lower charge is recommended for the bays in The Causeway and South Side Common, to provide an obvious alternative to parking on the congested High Street, and

help maintain the vitality of the area. Of course, the use of sustainable transport or active transport is always preferred, but it is recognised that some car use must be catered for. There are approximately 120 spaces in this area, for which it is proposed to set the lower charge level of £1.50 per hour to encourage parking away from the High Street.

Zone 2 & 3 – On Street Parking

- 5.14. The same principles apply as in Zone 1, but demand and capacity are not as high. Charges are proposed in Zone 2 at £3.00 & Zone 3, at £1.50. It is believed that this charge achieves a regular turnover of spaces, and nudges drivers towards considering alternative more sustainable forms of transport. Many of the shops and businesses in this area serve local residents, which can be visited in many cases by a short walk.
- 5.15. Members are reminded there are a high number of locations within the borough that offer 20 minutes free parking to help with the vitality of local shopping parades. The council subsidises these bays at a cost of circa £300k per year. Many of these bays are in fact the most congested bays in the borough causing significant ‘cruising’ and related congestion.
- 5.16. Notwithstanding the above, the council will continue to support this provision to assist local businesses.
- 5.17. In order to provide further support for local businesses and to support the night time economy, the council recommends a reduction in charges in the underused car parks of St Georges Road and Queens Road to a flat fee of £2 between 6pm and 11pm.

Table of proposed charges.

On-street pay & display	Per Hour
Zone 1 255 bays in Wimbledon town centre	£4.50
Zone 2 Wimbledon Village, Wimbledon Park, South Wimbledon Rayne’s Park. Colliers Wood,	£3.00
Zone 3 Mitcham, Morden and other areas not specified.	£1.50
Zone 1a Wimbledon Common	£1.50

Note: Areas shown are general description.

On Street Benchmarking Data

- 5.18. Only 255 bays (or 7% of all available bays in Merton are in Zone 1 Wimbledon Town Centre) at a charge of £4.50 per hour, which ranks Merton 9th against other London boroughs.

Ranking in order of cost	Borough	Most expensive on-street tariff (per hour)
1	Camden	£7.20
2	Southwark	£6.50
3	Islington	£6.20
4	Lambeth	£5.40
5	Kensington & Chelsea	£5.10
6	Hackney	£5.00
6	Tower Hamlets	£5.00
8	Westminster	£4.90
9	Merton Zone 1	£4.50
10	Bromley	£4.00
11	Wandsworth	£3.40
12	Haringey	£3.30
13	Hammersmith & Fulham	£3.20
14	Richmond	£3.00
14	Greenwich	£3.00
14	Ealing	£3.00
14	Sutton	£3.00
18	Croydon	£2.60
18	Redbridge	£2.60
20	Brent	£2.50
21	Kingston upon Thames	£2.40
21	Harrow	£2.40
21	Hillingdon	£2.40
24	Enfield	£2.00
24	Waltham Forest	£2.00
24	Newham	£2.00
27	Barking & Dagenham	£1.50
28	Bexley	£1.40
29	Havering	£1.00

No available data for Lewisham, Hounslow, Barnet.

OFF STREET (CAR PARK) CHARGES

- 5.19. Existing hourly charges in the borough's car parks vary from 30p to £1.50 per hour. The review has considered these charges and made recommendations, which link, to the geographic area, and transport accessibility and congestion at each car park.
- 5.20. The charge set reflects the level of PTAL rating and level of congestion. If customers have a genuine and easy choice to use public transport, or active transport, this should be encouraged. A higher charge is set at a level, which requires the 'customer to consider' their mode of transport. This is a proven and appropriate transport management tool.
- 5.21. To ensure the usage of the car parks are maximised, lower charges have been set off street than on street, by geographical area. This incentive will help prevent congestion on high streets and busy town centres, resulting in reduced roadside emissions, and addressing key air quality issues in the borough.

Table of proposed charges. - car parks

CAR PARK (Inclusive of VAT).	Current hourly rate/flat fee	Proposed hourly rate/flat fee per day	Amendments Following consultation
WIMBLEDON			
Broadway	£1.00	£2.00	
Hartfield Road	£1.50	£2.00	
Queens Road	£1.00	£1.50	£2 <u>flat</u> fee between 6pm and 11pm.
St Georges Road	£1.40	£1.50	£2 <u>flat</u> fee between 6pm and 11pm.
MORDEN			
Kenley Road (flat fee per day)	£3.50	£7.00	
Morden Park (hourly)	£0.40	£0.60	
Morden Park (flat fee per day)	£5.00	£7.00	
Peel House Lower	£0.40	£0.60	
Peel House Upper (flat fee per day)	£5.00	£7.00	
Peel House Upper (hourly)	£0.50	£0.60	
York Close (flat fee per day)	£5.00	£7.00	
York Close (hourly)	£1.00	£1.20	
MITCHAM			
Elm Nursery	£0.50	£0.60	
Raleigh Gardens	£0.50	£0.60	
St Marks Road	£0.40	£0.60	
Sibthorpe Road	£0.70	£0.90	

Benchmarking Off Street Charges

- 5.22. We aim to have charges that encourage motorists to use car parks rather than on street locations. The table below shows Merton to be competitive when comparing each boroughs highest published charge. We will keep this under review so that it is commensurate with our objectives.

Ranking in order of cost	Borough	Most expensive off-street tariff (per hour)
1	Kensington & Chelsea	£5.10
2	Lambeth	£3.00
2	Greenwich	£3.00
4	Tower Hamlets	£2.40
5	Richmond	£2.35
6	Kingston upon Thames	£2.30
7	Hammersmith & Fulham	£2.20
8	Sutton	£2.00
8	Waltham Forest	£2.00
8	Newham	£2.00
8	Merton (proposed)	£2.00
12	Hackney	£1.60
12	Harrow	£1.60
14	Ealing	£1.50
14	Redbridge	£1.50
14	Brent	£1.50
17	Enfield	£1.40
17	Lewisham	£1.40
19	Croydon	£1.30
20	Haringey	£1.25
21	Bromley	£1.20
21	Bexley	£1.20
23	Southwark	£1.00
23	Hillingdon	£1.00
25	Havering	£0.75

Note: other boroughs either do not own or manage car parks directly or no data is available including: Camden, Islington, Westminster, Wandsworth, Barking & Dagenham

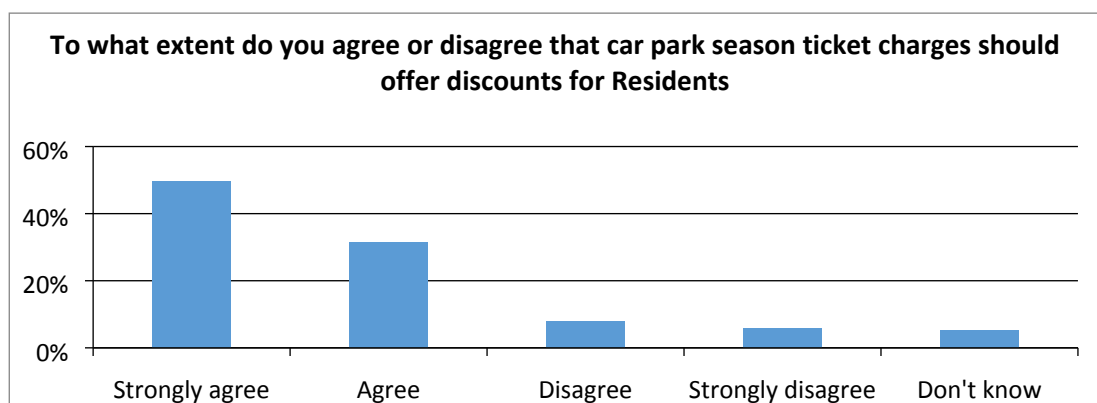
CAR PARK SEASON TICKETS

- 5.23. The cost of a car park season ticket has been frozen for 14 years.
- 5.24. In real terms, there has been a significant reduction in the cost of season tickets. The review considered an appropriate charge to be one that is comparable with other authority charges, and challenges motorists to consider other more sustainable forms of transport.
- 5.25. The current charge for a 12-month season ticket in a Morden car Park is £445. This equates to £1.78 per full days parking, (based on 250 working days per year), a price which does not support our aspirations of active travel and modal shift.
- 5.26. It is proposed to offer a significantly reduced charge of £20 total fee, in our car parks, to 'fully electric vehicles' (for season ticket sales) as a direct incentive to change the nature of vehicle ownership. This offer could provide users with a saving of up to approximately £1,300 per year.
- 5.27. The diesel surcharge on parking permits is not currently applied to car park season tickets. It is recommended that the diesel surcharge of £150 should be applied to customers applying for a season ticket in the same way as a resident purchasing a permit for a CPZ.

Season ticket charges

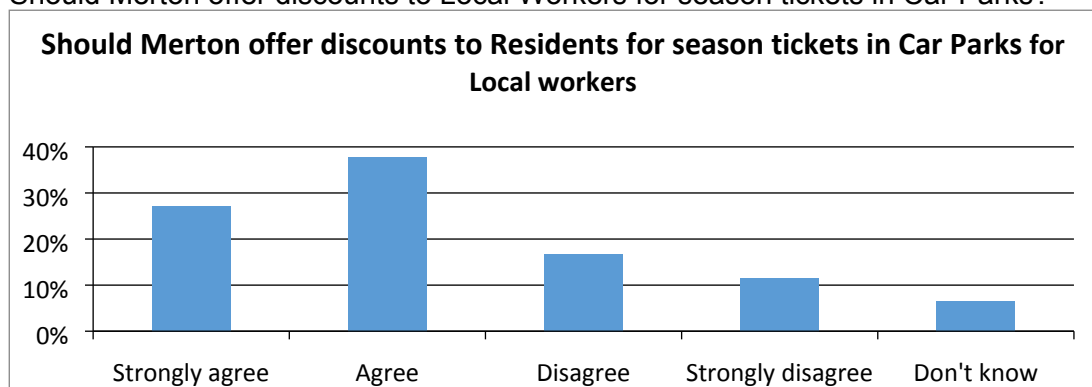
- 5.28. The principle of a discount for purchasing a season ticket already exists. It recognises that not all employees work every day at their office or place of work for various reasons e.g. annual leave. Without a discount, there would be no incentive for customers to buy season tickets, which is a convenience for them, and assists the council with not having to bank and collect cash on a regular basis.
- 5.29. Results from the online survey show that there was clear agreement that car park season tickets should offer discounts to residents,

Should Merton offer discounts to residents for season tickets in car parks?



5.30. In addition, there was further agreement that discounts should be offered to local workers for the purchase of season tickets in car parks. The proposals for a differential between commuters with and onward journey and parkers who either worked locally or are residents of the borough were set out in earlier reports and it is recommended these principles should be approved along with the proposed charges set out in the tables below.

Should Merton offer discounts to Local Workers for season tickets in Car Parks?



Mitcham Car Parks

5.31. Car parks in Mitcham are currently underutilised and do not have the same over use and capacity issues as many other car parks in the borough. Charges have therefore been proposed to reflect the current situation.

Mitcham Car Park	1 Month	+ 1 Month Diesel Surcharge £12.50	6 Months	6 month Diesel Surcharge £75	12 Months	12 Month Diesel Surcharge £150
Current charge	£25	N/A	£150	N/A	£300	N/A
Proposed local worker/ resident	£62.50	£75	£225	£300	£300	£450
Proposed commuter	£62.50	£75	£300	£375	£525	£675

Morden Car Parks

5.32. The charges in the table below show a minor adjustment downwards to the original proposed charges. The charges set out in the table offer a 10% discount for a commuter buying a 3-month season ticket, 20% for a 6-month season ticket and 30% for a 12-month season ticket.

5.33. In the case of a local worker or resident, a discount of 20% for a 3-month season ticket, 40% for a 6-month season ticket, and 60% for a 12-month season ticket will be offered.

Morden	3 Months	3 Month Diesel Surcharge £37.50	6 Months	6 month Diesel Surcharge £75	12 Months	12 Month Diesel Surcharge £150
Current charge	£1111	n/a	£223	n/a	£445	n/a
Proposed local worker/resident	£350	£387.50	£525	£600	£700	£850
Proposed commuter	£393.75	£431.25	£700	£775	£1,225	£1,375

Queens Road Car Park Wimbledon

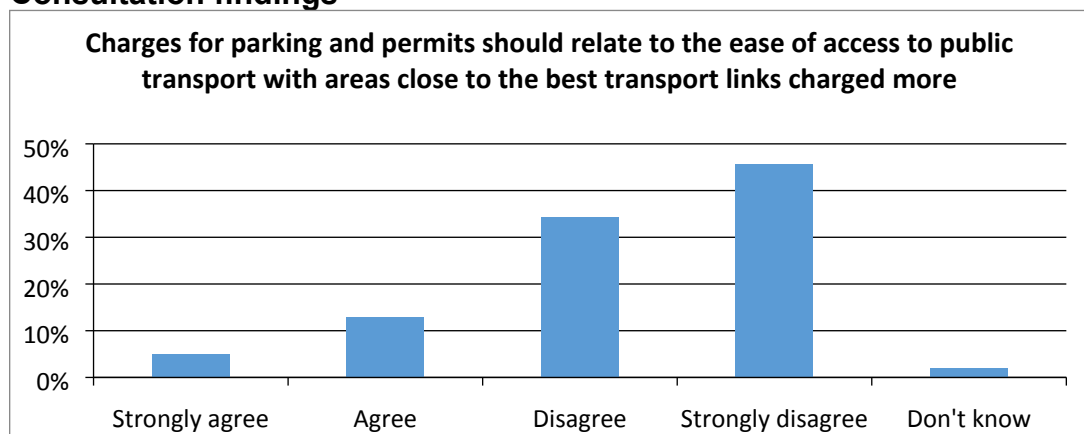
- 5.34. A mixture of commuters and local shoppers uses this car park. Demand varies throughout the year and at different times of the week. Given the nature and use of this car park, the following charges are proposed.

Queens Road -Wimbledon	3 Months	3 Month Diesel Surcharge £37.50	6 Months	6 month Diesel Surcharge £75	12 months	12 Month Diesel Surcharge £150
Current	£240	N/A	£480	N/A	N/A	N/A
Proposed local worker/resident	£300	£337.50	£600	£675	N/A	N/A
Proposed commuter	£337.50	£375	£675	£750	N/A	N/A

RESIDENTIAL PARKING PERMITS

- 5.35. Resident permit charges have been frozen since 2009, which means in real terms they have reduced in price for 10 years.
- 5.36. The review considered an appropriate price to be one that challenges motorists to consider the use of other more sustainable forms of transport.
- 5.37. The sale and price of permits is another way the council can influence car/vehicle use within the borough and directly contribute to the MTP, LIP and AQAP objectives.

Consultation findings



- 5.38. A number of residents highlighted the lack of public transport in specific areas of the borough. Representation highlighted that in some CPZs there could be more than 20-minute walk to reach a main line station or underground station. Although buses may provide alternative transport, it is accepted that access to public transport did vary within each area of the borough. The recent Residents survey referred to the provision of public transport within the borough, as being the most highly valued.
- 5.39. In reviewing the PTAL rating for each CPZ and further analysing walking distances to main line, tram and underground stations access, it is recommended that Controlled Parking Zones VNE, VNS, VN, VQ, VSW, VSW1, VSW2, be re-categorised as Tier 2 from Tier 1 as shown in Appendices 7d – 7f.
- 5.40. A high percentage of respondents did state that they considered the charges too high. Proposed charges took into consideration charge levels in other boroughs and general affordability. Although this increase may not be significant enough to have a direct and dramatic effect in the short term, it is an action the council consider very important in meeting its legal obligations to affect driver behaviour and car ownership for the reasons set out in detail throughout this and previous reports.
- 5.41. The principle of charges based on access to public transport had limited support as shown in the graph above at 6.37. However, some respondents agreed that certain areas are well served by public transport and supported the PTAL approach. The consultation responses did not identify any evidence or argument to undermine the case for charges linked to PTAL.

Zone duration	Tier 1 zones Wimbledon Town Centre	Tier 2 zones Part Colliers Wood/ South Wimbledon/ Rayne's Park/ Morden	Tier 3 zones Mitcham/ Part Colliers Wood	*100% electric vehicles All zones
Long (12 to 14.5 hrs)	£150	£130	£90	£20
Medium (6 to 10 hrs)	£120	£110	£80	£20
Short (1 to 4 hrs)	£110	£100	£70	£20

*The £20 fee is a reduction of £5 on the existing charge.

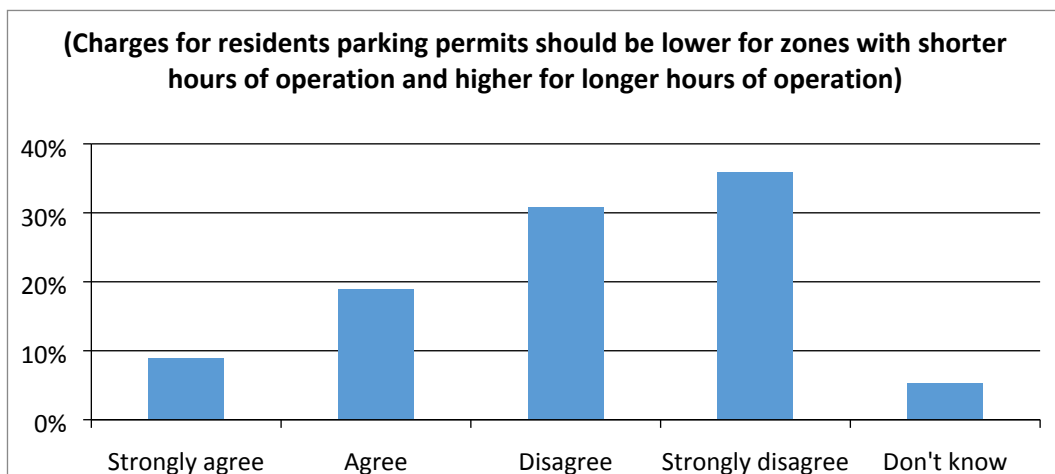
- 5.42. The Council is keen to continue to promote the use of electric vehicles and the new recommended charge for a permit for an electric vehicle is £20.
- 5.43. Note: A surcharge of £150 will continue to apply for diesel vehicles.

Houses with multiple permits.

- 5.44. The proposed charge for a second permit at the same property should incur a £50 surcharge, a third permit a £100 surcharge and a fourth permit at £150 surcharge.
- 5.45. Note: A further surcharge of £150 will continue to apply for diesel vehicles and will be applied to the cost of the original permit and the surcharges listed in 6.44 above.
- 5.46. The purpose of this charging scheme is to discourage multiple cars at one address. In the case of houses with multiple vehicles/permits, it is considered reasonable that those sharing the property could consider some form of car sharing. It is recommended this principle remains and details of the individual charges can be found in appendices 7d – 7f.

Hours of operation/enforcement

- 5.47. It is recommended to align charges with the hours of operation of the permit bays. For example, a CPZ that is controlled for a shorter period should cost less than CPZs that are controlled for a longer period. There is a direct cost of enforcement depending on the length of time a scheme is operational, and it is recommended this should be reflected in the cost of a permit.
- 5.48. Should this be agreed then there will need to be a process of considering amendments to CPZ operating hours. Officers will develop appropriate arrangements allowing residents to petition for changes and for them to be considered appropriately. It should be noted though that hours of operation generally reflect residents' demands, and the prevailing environment and demand. The maximum variable between short and long zones is between £20 & £40 per annum.



Benchmarking Residential Permits:

5.49. The tables below provide a comparison with different London boroughs showing the proposed Merton charges in relation to resident permits.

Cost	Highest priced residential permit by council (2019/20)
£250 - £500	Islington £490, Lambeth £306, Camden £296, Haringey £289, Hackney £264,
£151 - £250	Brent, £241 Kensington & Chelsea £236, Tower Hamlets 186, Wandsworth £183, Enfield, £165,
£0 - £150	Bexley £150, Sutton £150, Merton £150 tier 1 , Westminster £145, Barking and Dagenham £140, Waltham Forest £140, Ealing £125, Lewisham £120, Hammersmith and Fulham £119, Richmond £114, Bromley 100, Greenwich 100, Kinston £90, Croydon £80, Hounslow £80, Harrow £79, Havering £35, Redbridge £20.

Visitor Voucher Charges

5.50. The proposed charges are:

Tier	Half day	Full day
Tier 1 zones	£3.50	£5
Tier 2 zones	£3	£4
Tier 3 zones	£2	£3

Visitor Voucher Charges Benchmarking Data

Cost	Highest priced visitor voucher by council (2019/20)
£5 plus	Hammersmith £18, Islington £15.20, Richmond £8.40, Camden £7.23, Tower Hamlets £5.80, Wandsworth £7.70, Hounslow £7.50, Lambeth £5.37, Lewisham £5.60,
£2 - £5.	Newham £5, Waltham Forest £5, Merton £5 Tier 1 , Brent £4.50. Hackney £4, Croydon £4, Bromley £3.66,

Annual Visitor Permits

5.51. The proposed charges are set out in Appendices 7d – 7f.

6. FINANCIAL, RESOURCE AND PROPERTY IMPLICATIONS

- 6.1. Any increase in parking charges will inevitably have an effect on parking income. This is difficult to accurately predict since we are seeking to change motorists' behaviour and reduce car usage. As such, the current Medium Term Financial Strategy (MTFS) savings of £1.9m in 2019/20 and a further £1.9m in 2020/21 reflect assumptions on estimated decreases in demand across each income stream e.g. resident permits, visitor permits, pay etc. These assumptions will continue to be monitored and updated taking into account any agreed changes in fees and in motorists' behaviour.
- 6.2. The estimated 2019/20 income of £1.9m was based on an implementation Date of 1st October 2019. The overall level of income that will be achieved will be dependent on the actual implementation date and level of charges agreed following due process and consideration. It is important to note that the raising of income is not a contributing factor to any decision making process.
- 6.3. Local authorities are not permitted to use parking charges solely to raise income. When setting charges the focus must be on how the charges will contribute to delivering the Council's traffic management and key sustainability objectives.

7. ALTERNATIVE OPTIONS

- 7.1. This report is to inform Members of the key existing strategic drivers that will affect parking policy for the future. The public health agenda, the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality and

demand for kerbside space form the backdrop of the policy direction set out in this report.

- 7.2. Key strategic Council plans such as the Health and Wellbeing Strategy, Merton's Air Quality Action Plan, Merton's Local Implementation Plan include visions and interventions, which will help to achieve Key Council goals of improving population health, reducing inequalities between east and west Merton, improving air quality and shifting to more sustainable modes of transport. However, they will have limited impact without concurrent changes to parking provision for the future.
- 7.3. This review has looked at a wide range of options to support the above strategic drivers as well as a series of charging options for the future, A lower level of increases, or a 'do nothing' approach would not make any significant contribution towards the Councils strategic objectives. A higher level of increases would, in the view of officers, show insufficient regard for countervailing considerations (such as the need to make provision for those for whom, now, car use remains the only realistic option).
- 7.4. A further option is not to increase charges and accept car ownership and car use will continue to increase the consequent negative impact on air quality and public health. If we do nothing then this will have serious negative consequences on the general health of the local population. Doing nothing is not a recommended option as congestion will increase, we will continue to fail to meet the EU air quality standards and we will not be able to maximise sustainable active travel within the borough.

8. LEGAL AND STATUTORY IMPLICATIONS

Legal and regulatory requirements of Parking and transport management.

Statutory Provisions

- 8.1. The Road Traffic Regulation Act 1984 (s.122) specifies that the functions conferred on local authorities under the Act should be exercised:
"to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway".
- 8.2. This includes (in s.122(1) of the Act)
 - a) The desirability of securing and maintaining reasonable access to premises;
 - b) The effect on the amenities of any locality affected and (without prejudice to the generality of this paragraph) the importance of regulating and restricting the use of roads by heavy commercial

- vehicles, so as to preserve or improve the amenities of the areas through which the roads run;
- c) The strategy prepared under Section 80 of the Environment Act 1995 [National Air Quality Strategy]
 - d) The importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles.
 - e) Any other matters appearing to the local authority to be relevant.
- 8.3. Under Section 45 of the Road Traffic Regulation Act 1984 (RTRA 1984) local authorities may designate parking places and may make charges for vehicles left in a parking place so designated. In exercising its functions under the RTRA 1984, including the setting of charges for parking places, the Council must do so in accordance with Section 122 of the RTRA 1984 above.
- 8.4. In addition s.45(3) of the Act provides that in determining what parking places are to be designated under this section [45] the local authority shall consider both the interests of traffic and those of the owners and occupiers of adjoining property, and in particular the matters to which that authority shall have regard include—
- (a) The need for maintaining the free movement of traffic;
 - (b) The need for maintaining reasonable access to premises; and
 - (c) The extent to which off-street parking accommodation, whether in the open or under cover, is available in the neighbourhood or the provision of such parking accommodation is likely to be encouraged there by the designation of parking places under this section.
- 8.5. In accordance with the council's statutory responsibility under Section 122, the Council must have regard to these relevant considerations in the setting of charges. Setting pricing levels on the basis set out in this Report appears to be consistent with the requirements of the Act (provided that countervailing factors are also taken into consideration, as they have been in the present proposals).

Procedure

- 8.6. Under Section 35C and 46A of the Road Traffic Regulation Act 1984, a Local Authority has powers to vary off and on-street parking charges respectively. The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 contains the order making procedures as well as those to be followed when varying charges by way of a 'notice of variation'.
- 8.7. In this case, the Council decided to undertake a full TMO amendment procedure (rather than a Variation procedure) to enable a comprehensive and

detailed consultation process, as described in the article published by the Council in 'MyMerton'

8.8. Regulation 25 (in addition to requiring the publication in local newspaper) also requires the following:

- (a) For off-street parking, the local authority is required to display in the parking place a copy of the 'notice of variation' and take all reasonable steps to ensure it continues to be displayed in a legible condition (from the date of giving notice until it comes into force); and, if appropriate additional copies are to be displayed within the parking place and in roads giving access to the parking place; and
- (b) For on-street parking, the local authority may, if it thinks fit, display copies of the notice of variation in prominent positions in the road affected.

Fiscal Implications

8.9. The Road Traffic Regulation Act 1984 is not a fiscal or revenue-raising statute. In *Djanogly v Westminster City Council* [2011] RTR 9, Lord Justice Pitchford, in the Administrative Court, held that:

"In my view, when designating and charging for parking places the authority should be governed solely by the s.122 purpose. There is in s.45 no statutory purpose specifically identified for charging. Charging may be justified provided it is aimed at the fulfilment of the statutory purposes which are identified in s.122 (compendiously referred to by the parties as "traffic management purposes"). Such purposes may include but are not limited to, the cost of provision of on-street and off-street parking, the cost of enforcement, the need to "restrain" competition for on-street parking, encouraging vehicles off-street, securing an appropriate balance between different classes of vehicles and users, and selecting charges which reflect periods of high demand. What the authority may not do is introduce charging and charging levels for the purpose, primary or secondary, of raising s.55(4) revenue."

8.10. This was in accordance with the previous Court decision in *Cran v Camden LBC* [1995] RTR 346, and was subsequently approved by the High Court (Mrs Justice Lang DBE) in the case of *R (Attfield) v London Borough of Barnet* [2013] EWHC 2089 (Admin).

Application of Revenue

8.11. In terms of any income that may be generated by the increased charges, the Traffic Management Act 2004 amends section 55 (4) of the Road Traffic Regulation Act 1984 and directs that income should be used:

- (a) *To make good any payment used for parking places,*
- (b) *For the provision of or maintenance of off street parking (whether in the*

Open or not) and

(c) *Where off street parking provision is unnecessary or undesirable:*

(i) To meet the costs of provision of or operation of public passenger transport services, or

(ii) For highway or road improvement projects within the borough, or

(iii) For meeting costs incurred by the authority in respect of the maintenance of roads maintained at the public expense by them,

Or

(iv) For the purposes of environmental improvement in the local authority's area, or

(v) Any other purposes for which the authority may lawfully incur expenditure.

8.12. In addition, for London authorities, this includes the costs of doing anything “which facilitates the implementation of the London transport strategy”

8.13. However, for the reasons set out above Members must disregard any benefit in terms of the revenue that may be generated by these proposals when making the decision as to whether to proceed or not.

Decision-making: Public Sector Equality Duty (PSED)

8.14. In considering this Report and coming to their Decision, Members should have due regard to the need to:

(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this act;

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

(c) foster good relations between persons who share a relevant characteristic and persons who do not share it.

(Public Sector Equality Duty (s.149 Equality Act 2010))

8.15. The characteristics protected by the Act are:

a. age;

b. disability;

- c. gender reassignment;
- d. marriage and civil partnership;
- e. pregnancy and maternity;
- f. race;
- g. religion and belief;
- h. sex; and
- i. sexual orientation

- 8.16. Due regard means that the duty has been considered 'substance, with rigour, and with an open mind' and requires a proper and conscientious focus on the statutory criteria.
- 8.17. The PSED is a duty to have due regard to the specified issues, and not to achieve a particular outcome.
- 8.18. Members should have due regard to the Council's Equality Impact Assessment which accompanies this Report.

Decision-making - General Principles of Public Law

- 8.19. In considering his Report and coming to their decision, Members should ensure that the decision is one which is rational in public law terms.
- 8.20. This requires that Members carefully consider all relevant information, and disregard any information which is irrelevant, and so the proposed policy, the reasons for the proposed charging scheme and pricing should be considered with regard to the statutory purposes of the Road Traffic Regulation Act set out above.

Duty to give conscientious consideration to the consultation results

- 8.21. The Courts have held that a consultation should meet the following standards:
- Consultation must be at a formative stage
 - Sufficient information should have been provided to ensure consultees are able to provide a full response
 - Sufficient time for response should be allowed, and
 - Members should conscientiously take the consultation responses into account

Modifications and Post-decision process for making the proposed Orders

- 8.22. The draft Cabinet report recommends that the TMOs be made with the following modifications:-
- 8.22.1. the permit increase for certain permits in controlled parking zones VNE, VNS, VN, VQ, VSW, VSW1 and VSW2 will be lower than that first proposed and are modified by:-
- (a) For example reducing the cost of the annual visitor permits in VSW1 from £360 to £320; which is a percentage reduction of 11.1%;
 - (b) For example reducing the cost of annual resident permits in VN from £120 to £110, which is a percentage reduction of 9.1%.
- 8.23. For example the overnight parking charges in the Queens Road and St Georges Road Car Park will be amended to a flat fee of £2, instead of £3.
- 8.24. For example the price for season tickets at the Morden Car Parks will be reduced by 6.7% or less.
- 8.25. Before the TMOs are made with modifications the Council is required to consider whether or not the modifications amount to a substantial change in the orders.
- 8.26. If the modifications are regarded as making a substantial change in the orders the Council is required to take the following steps:
- (a) inform persons likely to be affected by the modifications;
 - (b) give those persons an opportunity to make representations; and
 - (c) ensure any such representations are duly considered.
- 8.27. It is considered that these reductions in parking charges are not substantial either in themselves nor having regard to the entire scope of the proposed TMOs.
- 8.28. If Cabinet agree with the officer recommendation that the proposed modifications do not appear to make a substantial change in the TMOs, the orders can be made without further consultation described in paragraph 9.26 above.
- 8.29. The process would be as follows:-
- (a) choose a date to make the TMOs and an operational date for the Orders.
Orders once made are subject to a statutory 6 week judicial review period during which applications can be made to the High Court by persons wishing to question the validity of the Orders on the grounds that they are not within the powers of the Road Traffic Regulation Act 1984 or that the appropriate statutory procedures have not been complied with.
It would be prudent that the new charges come into force after this 6 week period has expired to avoid unnecessary costs that might be

incurred delaying the implementation of the TMOs should a legal challenge be made against the Orders in the High Court.

Please note that the publication of the notice of making the TMOs is not an invitation to make further representations.

- (b) e-mail or write to all Cllrs and associations confirming that the Orders are to be made.
 - (c) within 14 days of making the Orders publish a notice of making in the local press and write to/email all persons/organisations who have made representations to notify them of the making of the Order and where persons have objected to the proposals and the objection(s) have not been wholly acceded to, include the reasons for the decision to make the Order.
 - (d) remove the notices of proposal displayed on site and replace with notices of making.
 - (e) deposit the notice of making and the made Orders at the Civic Centre and at all local libraries for a period of 6 weeks.
 - (f) the Orders would come into force after the 6 weeks legal challenge period.
 - (g) remove the on-site notices of making.
- 8.30. The process of making and implementing the TMOs will likely take up to 8 weeks from the date of final decision.

9. CONSULTATION PROCESS

- 9.1. Merton is committed to undertaking comprehensive consultation to gain the views of residents and stakeholders. This enables the Council to make informed decisions and to develop our policies.
- 9.2. The Parking Charges consultation commenced on Friday 29th March and ended Sunday 5th May 2019. As this consultation formed part of a statutory consultation process, there were a number of legal obligations, as well as a commitment to bringing the proposals to as wide an audience as possible.
- 9.3. To ensure the council could generate as much feedback as possible, representations were invited in writing via the web page, or by email to a dedicated email box.
- 9.4. In addition, an online survey was available which asked prescribed questions and tick box responses, which were recorded. The response options to each question were Strongly Agree, Agree, or disagree, disagree and strongly disagree and do not know. The questions asked along with the responses are shown in Appendices 1, 2 & 3.
- 9.5. Circa 3,000 representations were received.

- 9.6. The Council published a 2-page feature article in My Merton, which was delivered to every household within the borough in March/April 2019 to align with the consultation period.

As well as the online consultation and the My Merton article the council also:

- Attended Community Forum meetings during the period of the consultation
 - Followed the statutory TMO process of displaying notices in roads within all of the CPZ areas, on pay, display machines, and in all council owned car parks.
 - A statutory notice placed in the newspaper
 - Copies of all proposals and background papers were made available on deposit at all libraries and at the Civic Centre for public inspection/reference.
 - Consulted with statutory and non-statutory consultees
 - On the council's home page, we displayed a link to the consultation web pages. The web pages gave full details of the proposal along with background papers and reports. The pages also included a section, which aimed to address frequently asked questions.
- 9.7. A number of statutory bodies were consulted as part of the Traffic Management Order making process. The only response received was from the Metropolitan Police who raised no objections.
- 9.8. Due to the number of responses received, the council extended its review period to the 18th June 2019. This ensured that full consideration was given to all representations, and to allow any further comments from the resident and business associations to be included.

10. HUMAN RIGHTS, EQUALITIES AND COMMUNITY COHESION IMPLICATIONS

The original equalities impact assessment has been updated following the recent consultation process. The revised EIA is attached as Appendix 9

11. CRIME AND DISORDER IMPLICATIONS

None

12. RISK MANAGEMENT AND HEALTH AND SAFETY IMPLICATIONS

There are no health and safety implications associated with this report at present.

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

Appendix 1	Online survey - Consultation Results
Appendix 1a	Online survey – Geographic image
Appendix 2	Responses from Residents association and organisations
Appendix 3	Council response to representations.
Appendix 4	Street Charges Map
Appendix 4a	Plan of On street charging zones for Wimbledon Town Centre
Appendix 5	Public Transport Accessibility Levels. (PTAL)
Appendix 6	Map of CPZ zones
Appendix 7a – 7f	Revised parking charges schedule.
Appendix 8	Benefits of walking and cycling.
Appendix 9	Equalities Impact Assessment.

BACKGROUND PAPERS

- **London Borough of Merton’s Air Quality Action Plan 2018-2023**, available here: <https://www2.merton.gov.uk/Merton%20AQAP%2020182023.pdf>
- **Annual Public Health Report 2017-18**, available here: <https://www2.merton.gov.uk/health-social-care/publichealth/annualpublichealthreport.htm>
- **Merton’s Health and Wellbeing Strategy 2015-2018** (please note this is currently being refreshed), available here: <https://www2.merton.gov.uk/merton-health-and-wellbeing-strategy-web.pdf>
- **Mayor’s Transport Strategy 2018**, available here: <https://www.london.gov.uk/sites/default/files/mayors-transport-strategy-2018.pdf>
- **Mayor’s Health Inequalities Strategy 2018**, available here: https://www.london.gov.uk/sites/default/files/health_strategy_2018_low_res_fa1.pdf
- **‘Benefits of Parking Management in London August 2018’**. <https://www.londoncouncils.gov.uk/node/34485>
- **Commission on Climate Change Report. May 2109** <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/>

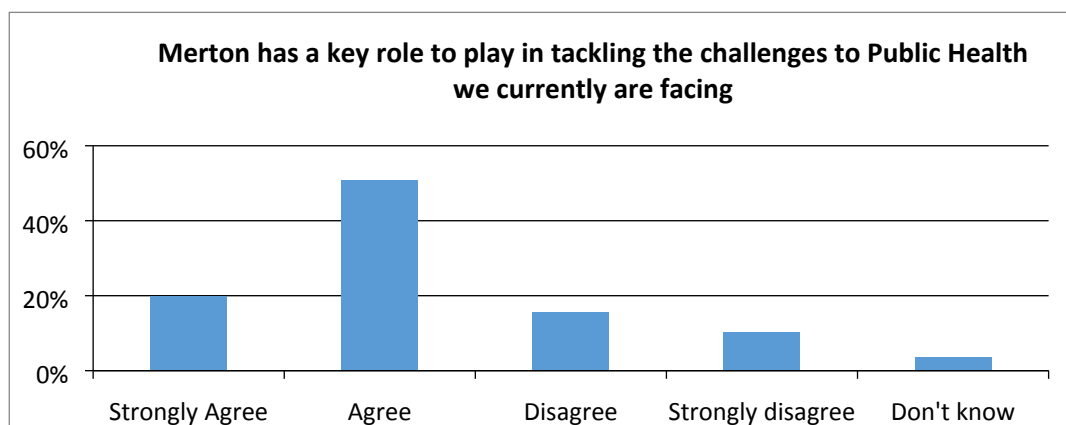
Parking charges survey detailed analysis

The sections below summarise the findings associated with each question and provide a graph for convenience. In all cases where it is stated respondents agreed, the figure given includes those that agreed and strongly agreed. Likewise, in the cases where we have stated respondents disagreed, this figure includes those who have either disagreed or strongly disagreed.

In some cases, we have drawn out a comparison from different ‘groups’. This is to show if for example car owners answered the same question differently to non-car owners, the same principle applies for individuals with a disability who responded, and various age groups, etc.

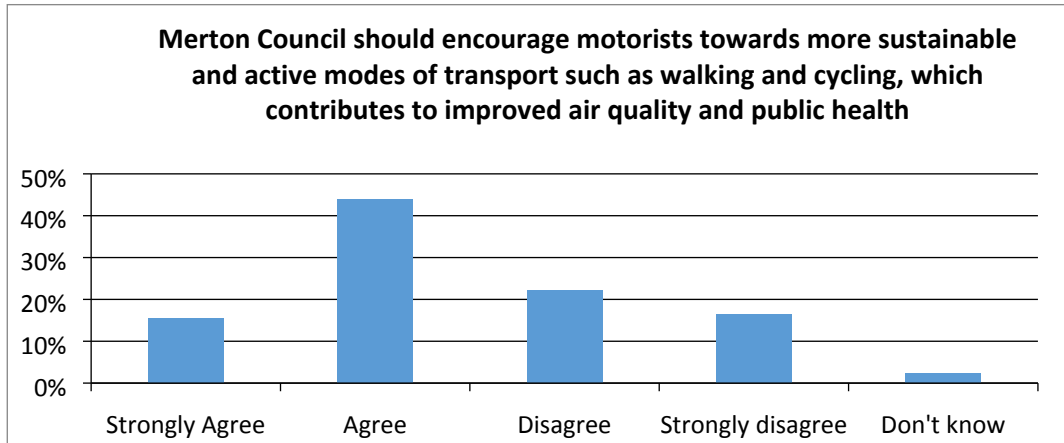
Q1 PUBLIC HEALTH & AIR QUALITY

Nearly three quarters (71%) of respondents agreed with the statement that Merton has a key role to play in tackling the challenges to public health we currently are facing with 26% disagreeing and 4% do not know. Non-car owners were more likely to agree (76%), whilst disabled respondents were less likely to agree (57%).



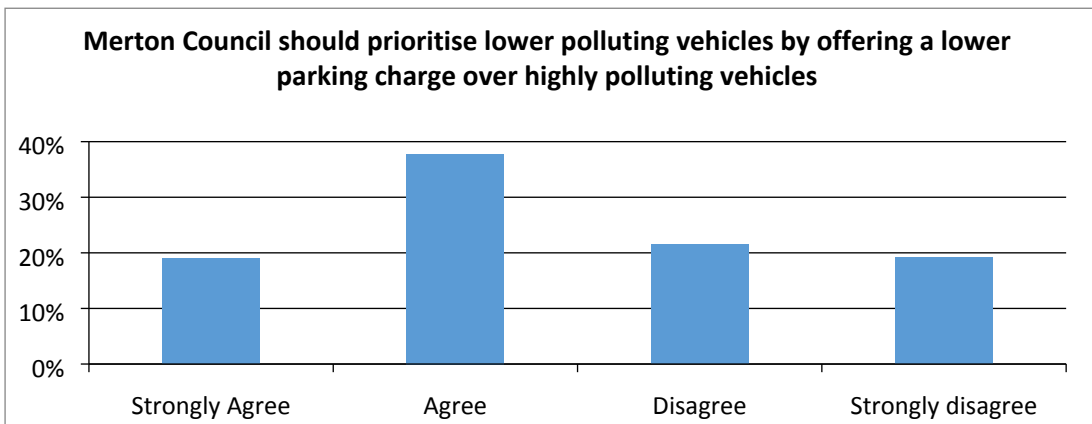
Should Merton encourage active travel and use of public transport?

Just over half (60%) agreed that Merton Council should encourage motorists towards more sustainable and active modes of transport such as walking and cycling, which contributes to improved air quality and public health with 38% disagreeing. Non-car owners were much more likely to agree (73%) as were Asian respondents (70%). Disabled respondents were less likely to agree (49%).



Prioritising vehicle type.

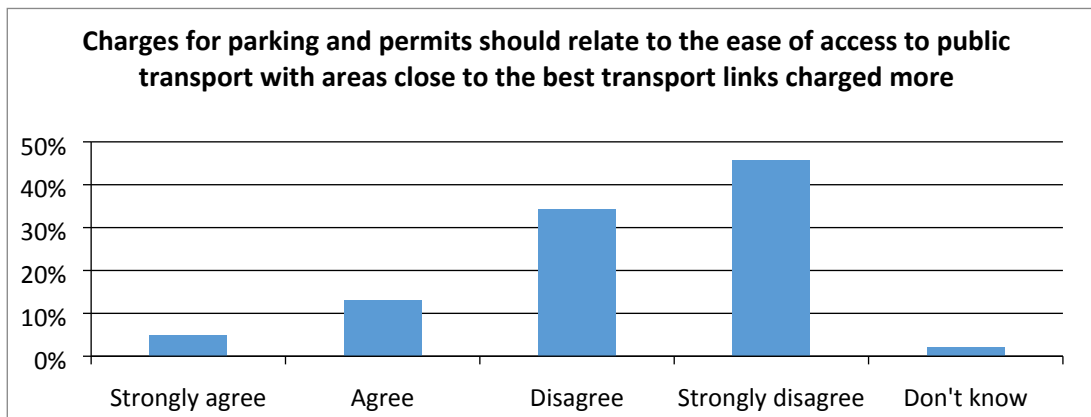
A similar proportion (57%) agreed that Merton Council should prioritise lower polluting vehicles by offering a lower parking charge over highly polluting vehicles. Again non-car owners were much more likely to agree (72%) as were older people with 61% of 66-75 year olds and 80% of over 76 year olds agreeing.



Q2 TRANSPORT MANAGEMENT

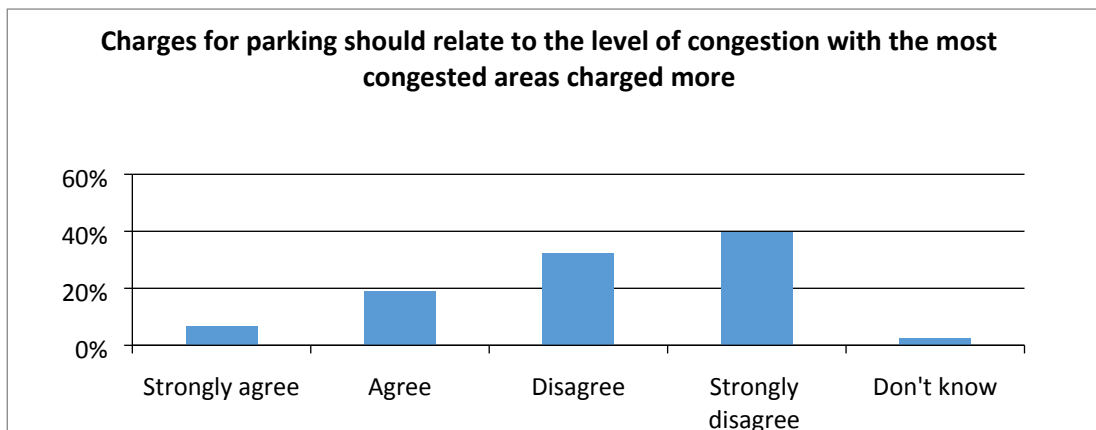
PTAL rationale for Permits and On Street Parking

Four-fifths (80%) disagreed that charges for parking and permits should relate to the ease of access to public transport with only 18% agreeing. Non-car owners were less likely to disagree (64%) and more likely to agree (34%). 36-35 year olds were more likely to disagree (85%) include 54% who strongly disagreed.



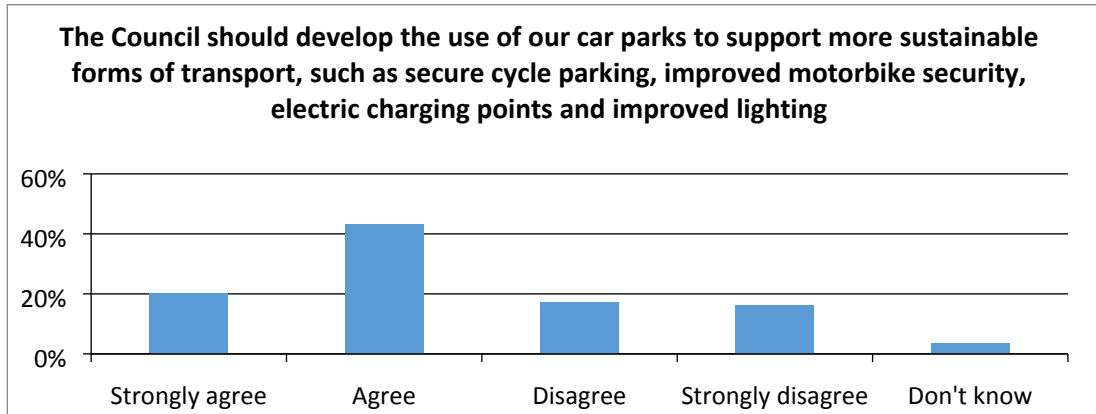
Charges relating to levels of congestion

Nearly three-quarters (72%) of respondents disagreed that charges for parking should relate to the level of congestion with the most congested areas charged more whilst a quarter (26%) agreed. Non-car owners were less likely to disagree (52%) and more likely to agree (45%). Those who work in Merton were more likely to disagree (77%).



Should Merton develop the use of car parks?

Nearly two-thirds (63%) agreed that the Council should develop the use of our car parks to support more sustainable forms of transport with 33% disagreeing. Non-car owners were more likely to agree (72%), where as those who work in Merton were less likely to agree 57% as were disabled respondents (47%).



Q3 CAR PARK SEASON TICKETS

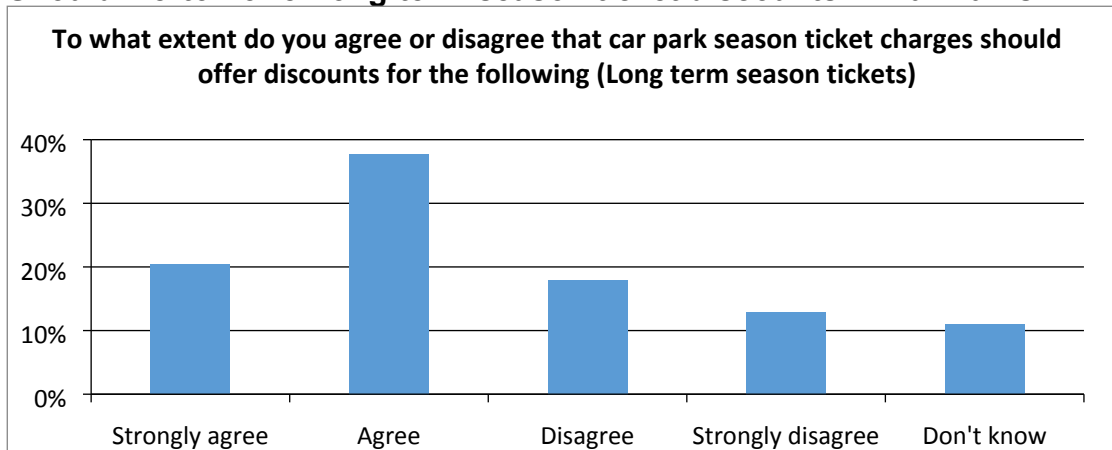
Responders were asked if they agreed that discounts for car park season tickets should be available to the following groups:

- Longer term season tickets
- Electric vehicles
- Residents

Local workers

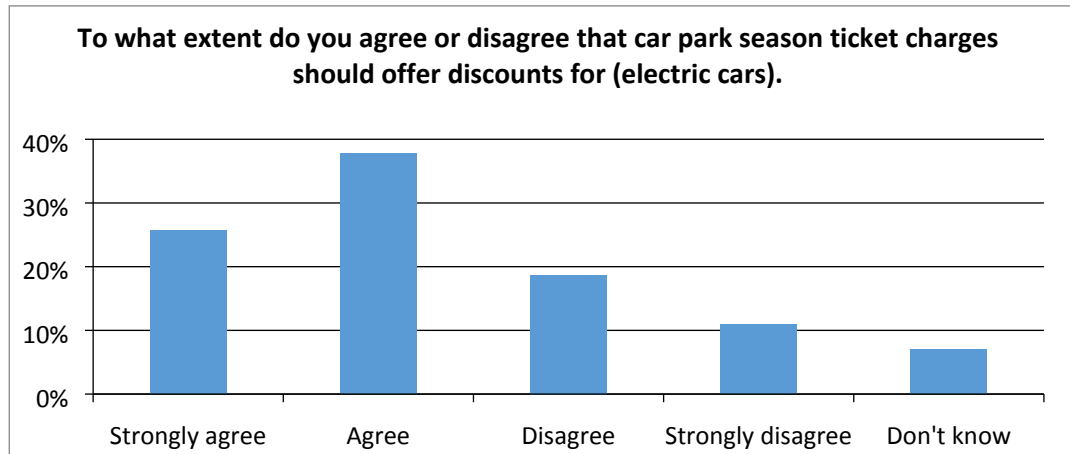
Over half (58%) agreed that discounts should be given to longer-term season tickets with 31% disagreeing. Non-car owners were less likely to agree (48%) and more likely to disagree (42%). Those who working in Merton were more likely to agree (62%), whereas disabled respondents were less likely to agree (52%).

Should Merton offer long-term season ticket discounts in Car Parks?



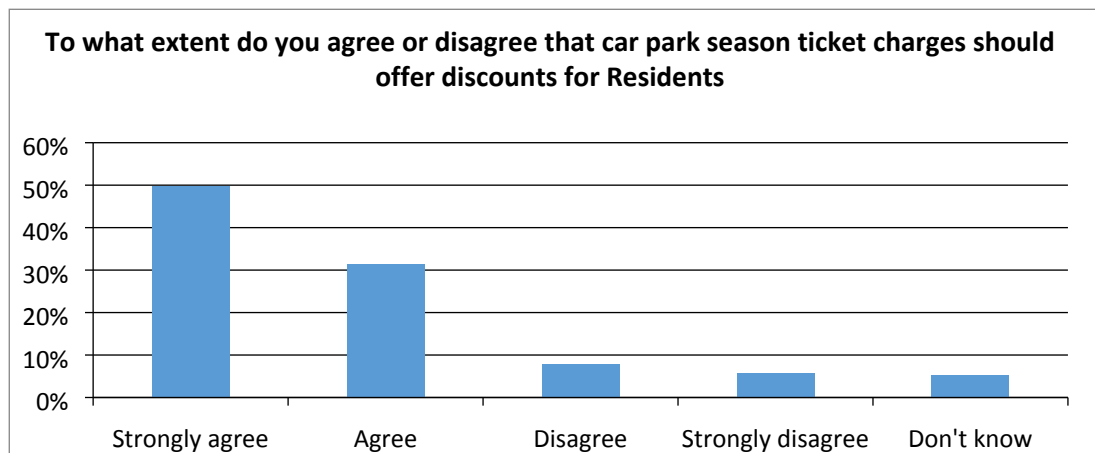
Should Merton offer discounts to Electric vehicles in Car Parks?

Nearly two thirds of respondents (64%) agreed that electric vehicles should receive a discount on season tickets with 30% disagreeing. Non-car owners were more likely to agree (69%).



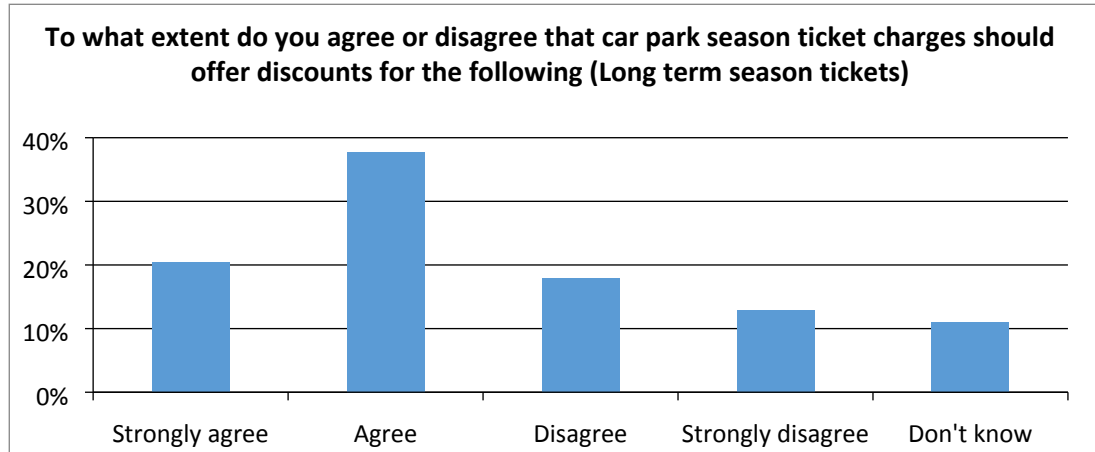
To what extent do you agree or disagree that car park season ticket charges should offer discounts for residents?

More than three-quarters of respondents (81%) agreed that residents should receive a discount on season tickets. Non-car owners were less likely to agree (76%).

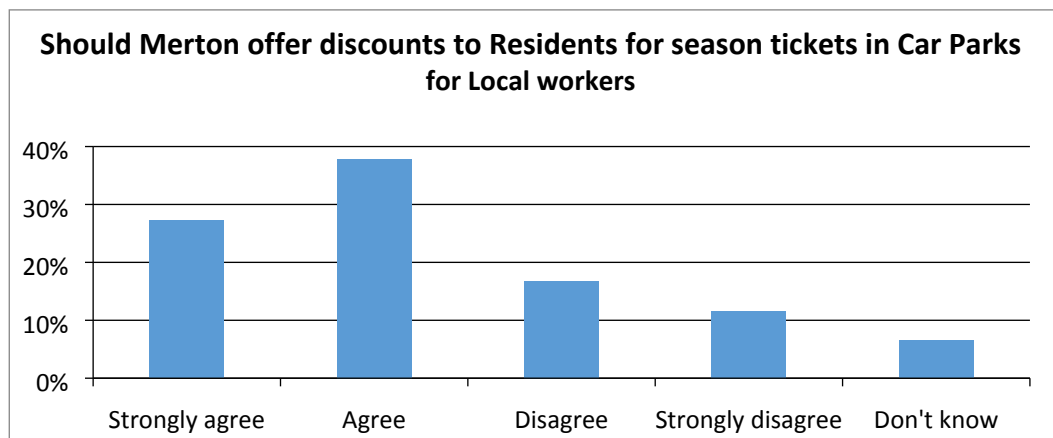


To what extent do you agree or disagree that car park season ticket charges should offer discounts for the following (Long term season tickets)?

Nearly two thirds of respondents (68%) agreed that local workers should receive a discount on season tickets with 31% disagreeing. Non-car owners were less likely to agree (51%) whereas those who worked in Merton were more likely to agree (71%).



Should Merton offer discounts to Local Workers for season tickets in car parks?

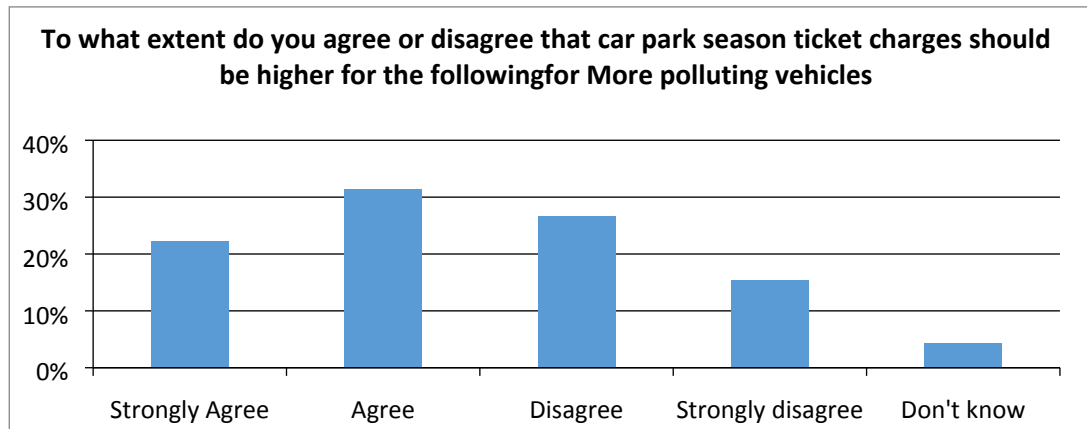


Season ticket holders should be charged more for more polluting vehicles.

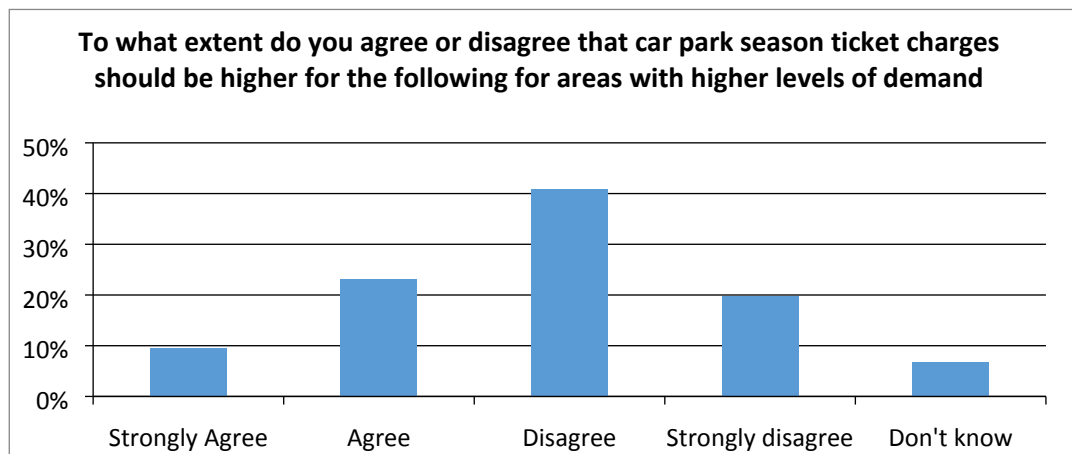
Respondents were asked if they agreed that car park season tickets should be higher for the following groups:

- More polluting vehicles
- Rail heading (those driving into Merton to join the rail network)
- In areas with higher levels of demand

Over half of respondents (53%) agreed that more polluting vehicles should pay more for car park season tickets whilst 42% disagreed. Non-car owners were more likely to agree (68%), whilst those who work in Merton were less likely to agree (48%).



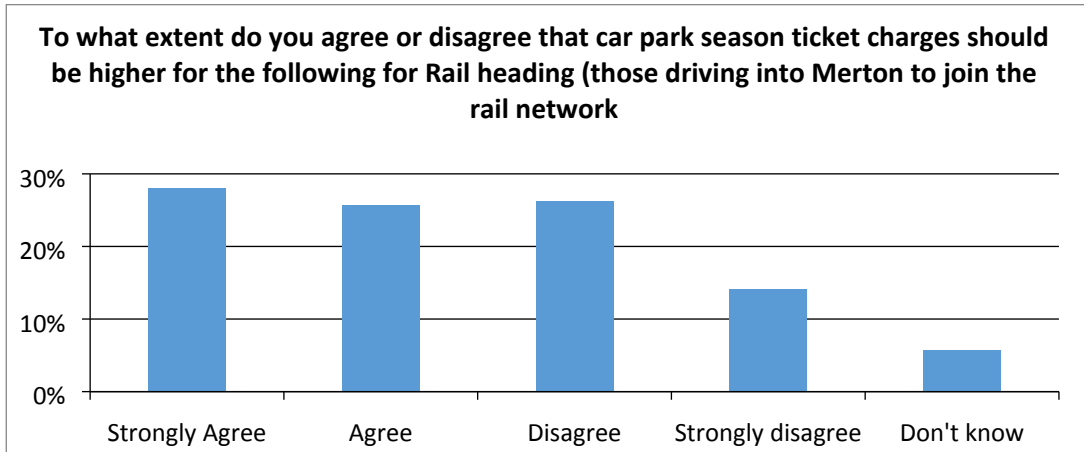
Higher charges for areas with higher levels of demand.



Higher charges for commuter parking

Over half of respondents (54%) agreed that those Rail heading should pay more for car park season tickets whilst 40% disagreed. Those who work in Merton were less likely to disagree (49%) as were those aged 25-36 (47%) and disabled respondents (50%).

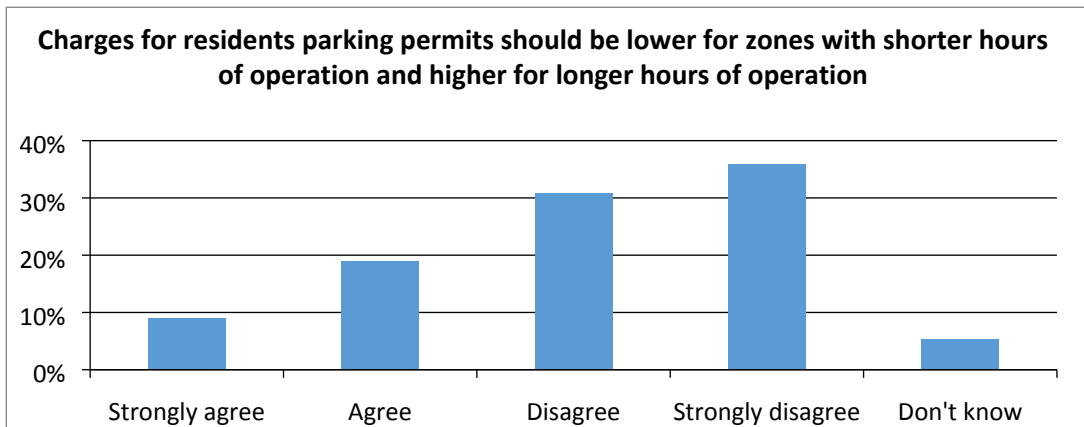
Nearly two-thirds (61%) disagreed that car park season tickets should be higher in areas with higher levels of demand with 33% agreeing. Non-car owners were more likely to agree (40%) and less likely to disagree (50%). Those who work in Merton were more likely to disagree (66%) and disabled respondents were less likely to agree (28%).



Q4 RESIDENT PARKING PERMITS

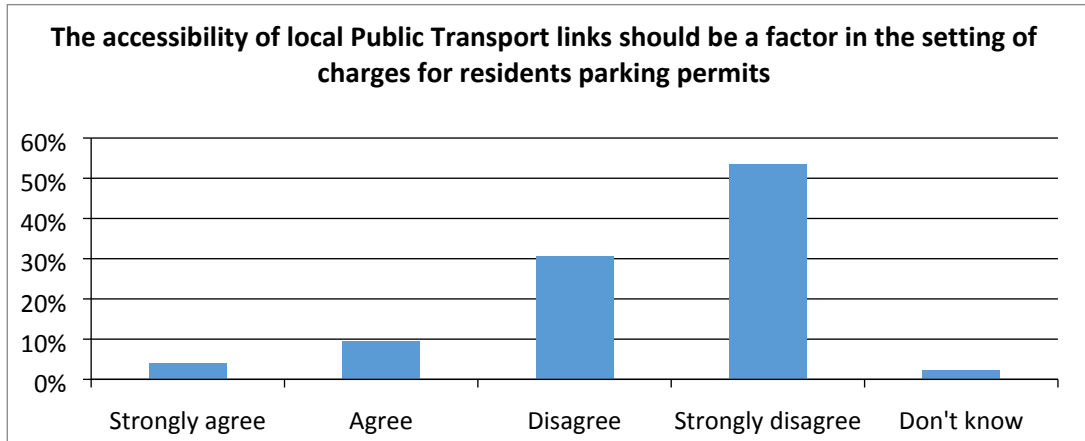
Hours of operation

Two-thirds (67%) of respondents disagreed that charges for residents parking permits should be lower for zones with shorter hours of operation. The level of disagreement was slightly higher (71%) for those who live in controlled parking zones and for those aged 26-35 (72%). Those aged 66-75 (63%) and over 75 (47%) were less likely to disagree.



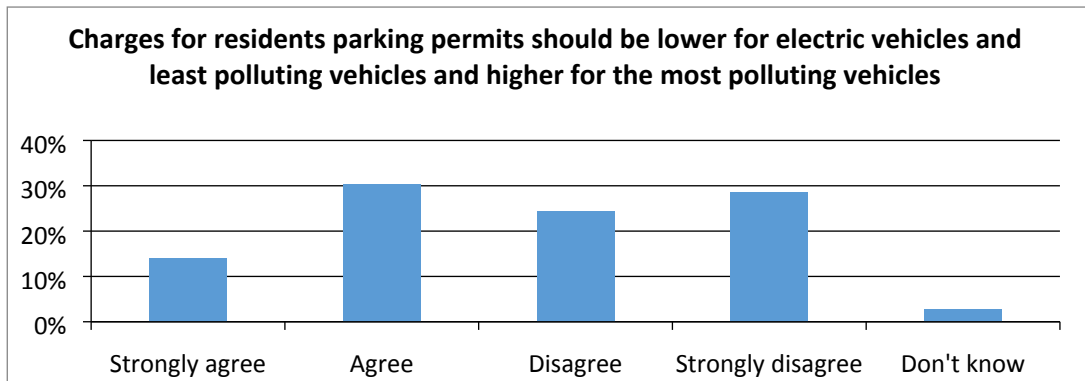
PTAL (Transport accessibility)

The vast majority of respondents (85%) disagreed that the accessibility of local Public Transport links should be a factor in the setting of charges for residents parking permits, with just over half (54%) strongly disagreeing. 14% agreed with the statement. Non-car owners were less likely to disagree (70%) and more likely to agree (28%). Those who live in a controlled parking zone were more likely to disagree (88%) and strongly disagree (58%). Those aged 25-36 were more likely to disagree (88%) whilst those aged over 75 were less likely to do so (63%).



Car Fuel Type

Just over half of respondents (52%) disagreed that charges for residents parking permits should be lower for electric vehicles and least polluting vehicles and higher for the most polluting vehicles whilst 44% agreed with the statement. Non-car owners were more likely to agree (58%) and less likely to disagree (38%). Residents aged 26-35 were more likely to agree (50%) as were those aged over 75 (58%)

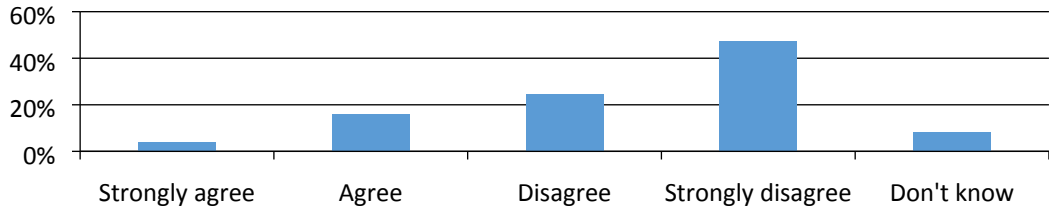


Q5 PROPOSED CHARGES

On Street Parking

Just under three quarters (71%) of respondents disagreed with the proposed charges for on-street parking with 20% agreeing. Non-car owners were more likely to agree (28%) and less likely to disagree (63%). Those who work in Merton were slightly more likely to disagree (74%) as were disabled respondents (78%).

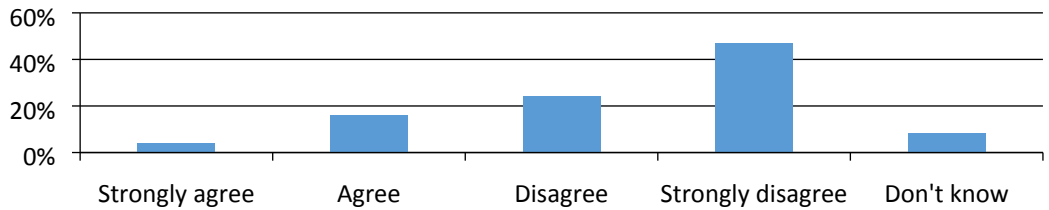
To what extent do you agree or disagree that the proposed charges have been set at a level which will help achieve the objectives to encourage active travel and sustainable transport, and help reduce congestion and air pollution (On Street Parking).



Car Parks

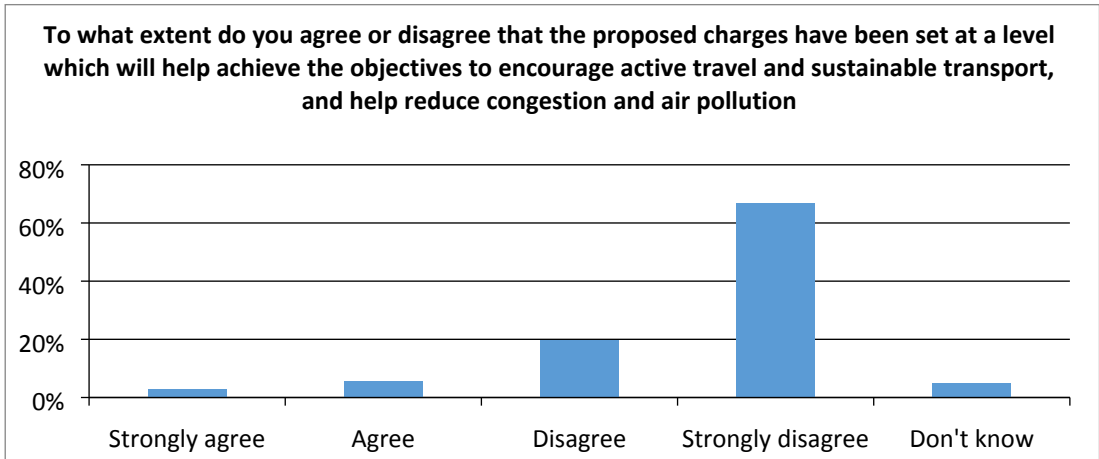
Over half of respondents (56%) disagreed with proposed charges in car parks charges, with 28% agreeing. Those who work in Merton were more likely to disagree (60%) as were disabled respondents (67%).

To what extent do you agree or disagree that the proposed charges have been set at a level which will help achieve the objectives to encourage active travel and sustainable transport, and help reduce congestion and air pollution (On Street Parking).



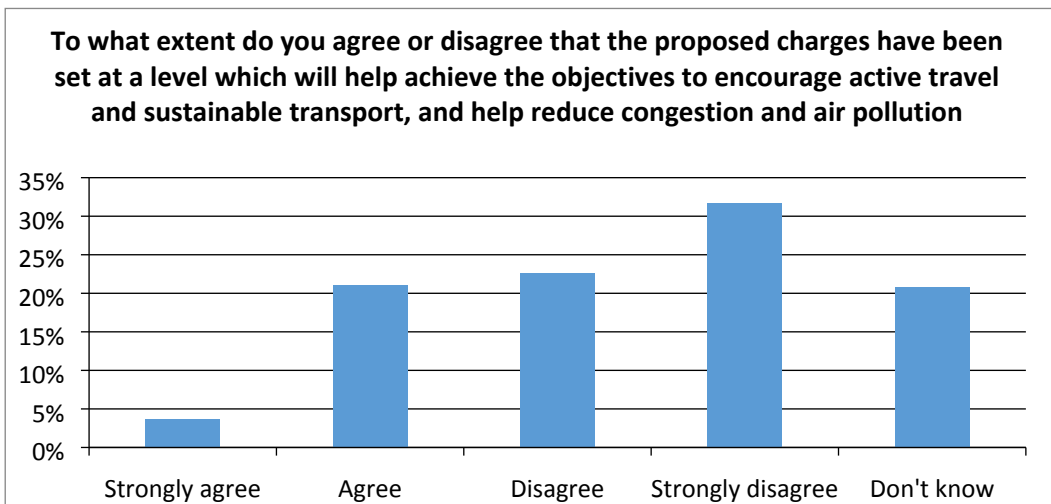
Residents Permits

A large majority (87%) disagreed with proposed charges for resident's permits with two-thirds (67%) strongly disagreeing and only 9% agreeing. Non-car owners were more likely to agree (19%) or disagree (73%). Those who live in controlled parking zones were more likely to disagree (90%) whereas those who work in Merton were less likely to disagree (81%).

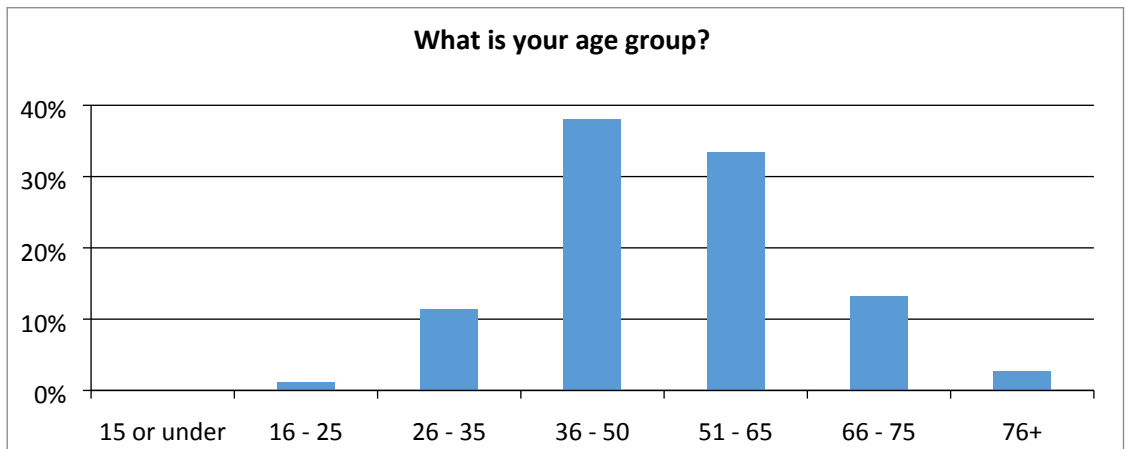
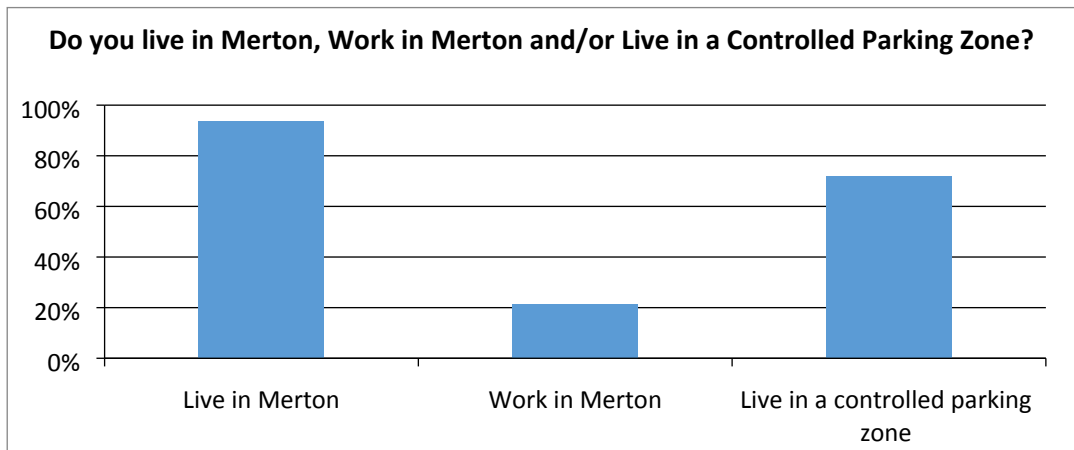
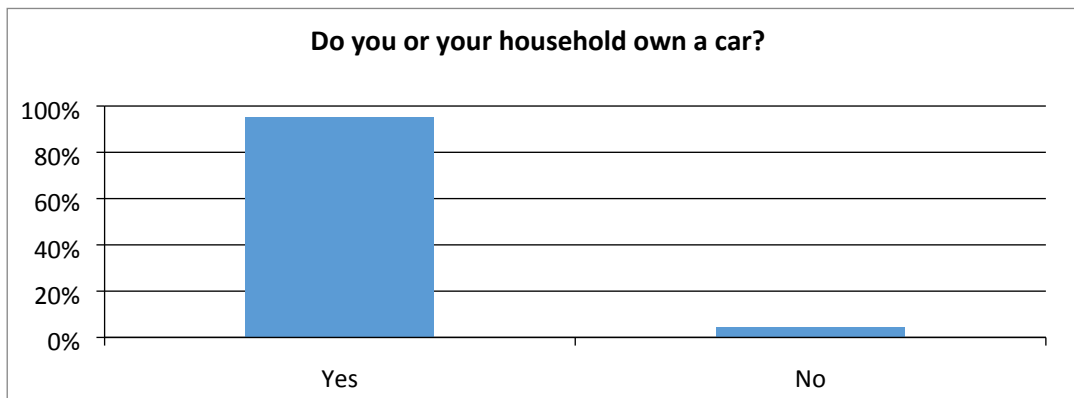


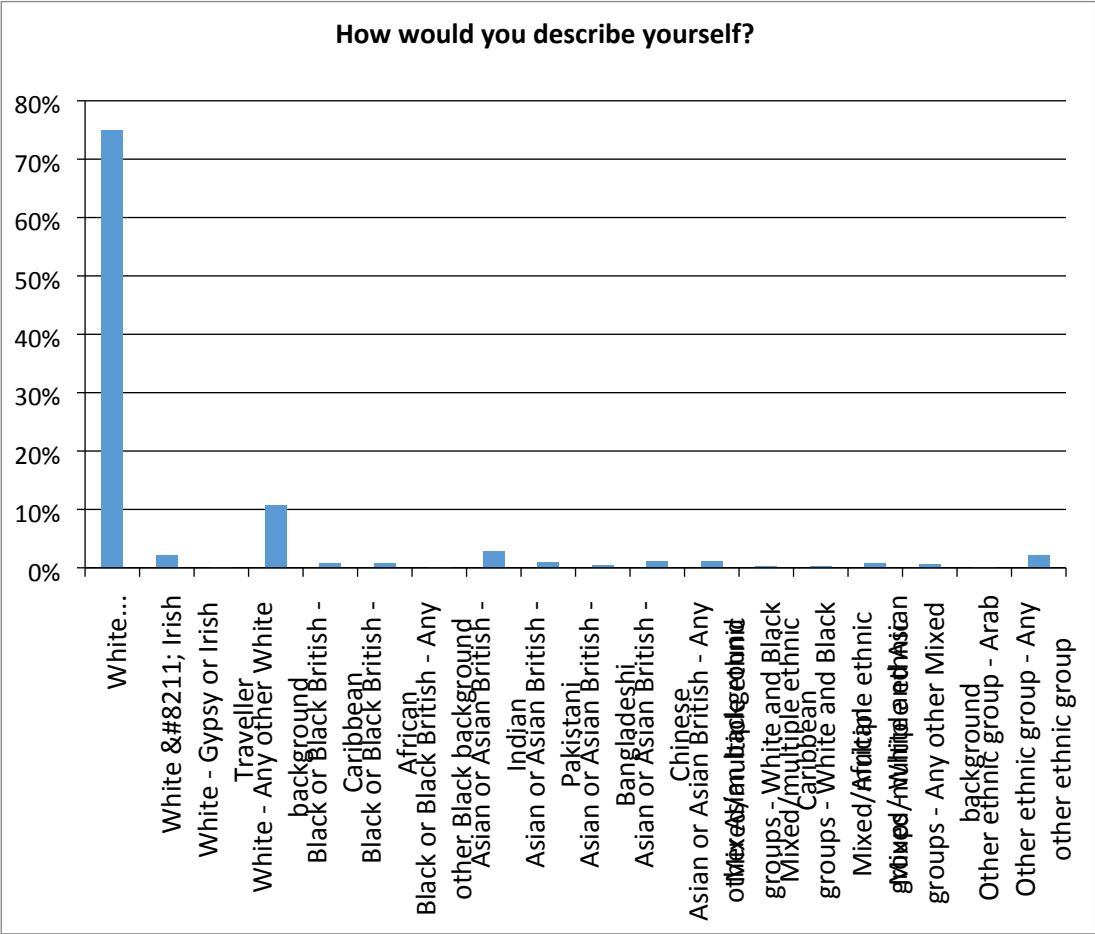
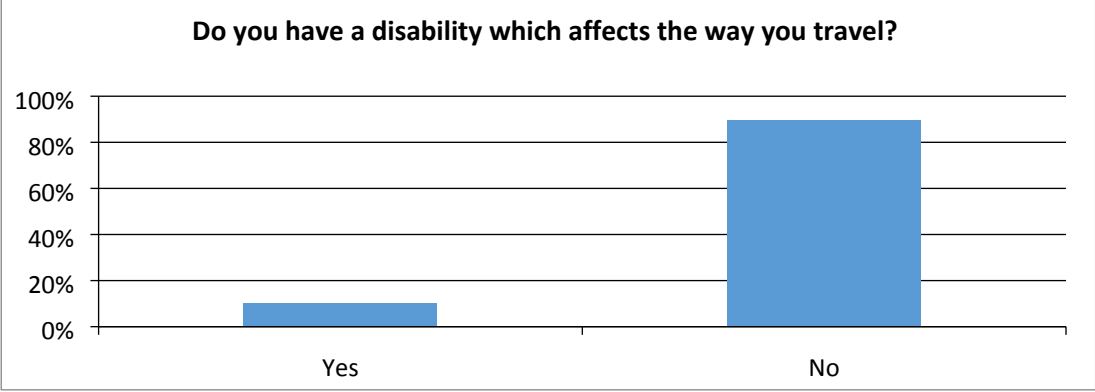
Season Tickets

Just over half of respondents (55%) disagreed with proposed charges for car park season tickets with 25% agreeing and 21% saying they do not know. Those who work in Merton were more likely to disagree (59%), as were disabled respondents (63%).

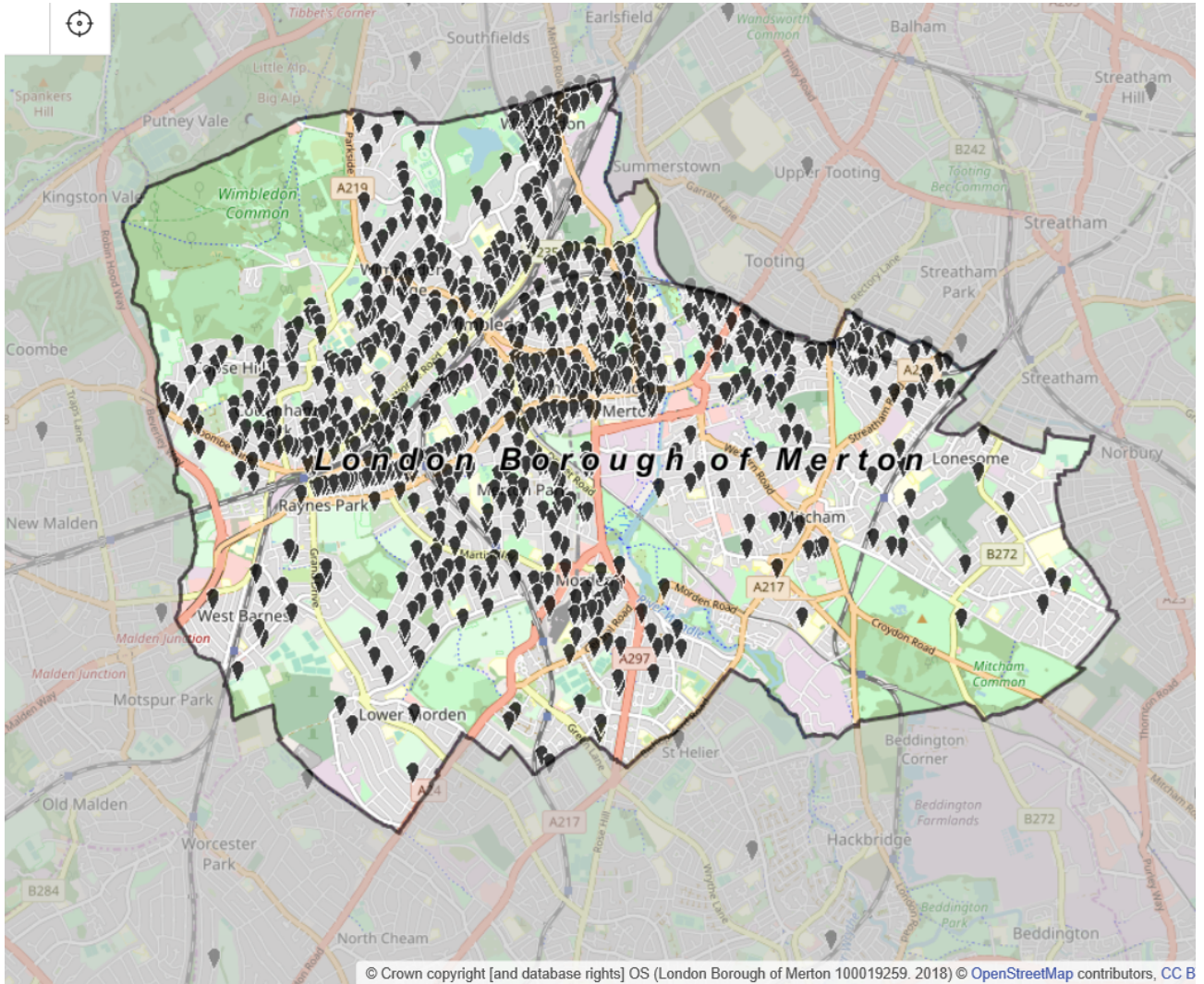


Details of Online Summary - Information about who responded.





The image below shows gives a geographic image of representations received via the online consultation survey.



REPRESENTATIONS FROM STATUTORY BODIES, ORGANISATIONS AND PETITIONS.

MERTON LIBERAL DEMOCRATS

The Liberal Democrats submitted a petition of 1,092 signatures opposing the proposal to increase parking charges. A detailed Representation was also submitted addressing each of the questions within the online survey.

There was agreement that Merton has a key role to play in improving public health, air quality and reducing congestion. Concerns were raised that the policy should be mindful of people who may not easily be able to use public transport / walk / cycle, such as those with mobility issues or young children. They further suggested that support to make the desired change in behaviour, such as scrappage deals, or only applying emissions charges to new permits or renewals, would be more effective.

They questioned the council's approach to the use of PTAL ratings, and believe that the introduction of emissions based charging, a more appropriate policy.

The submission challenges some of the academic findings in the earlier report. They suggested that the council also looked at its own staff parking policies and how parking is provided for their work force.

LOVE WIMBLEDON (BUSINESS IMPROVEMENT DISTRICT)

Fully support improving air quality in Merton and are actively working to assist this objective. They believe there are four key issues that are causing poor air quality such as through traffic, number of diesel buses and taxis often left idling and school traffic.

They are concerned about the impact on our high streets and town centres believing the increased charges will have a negative impact. Car park charges are already high enough and they would like to see evidence of the frequency of cars circling for car parking spaces. They have highlighted that the current car parks require improvements.

In addition, they highlight that the comparative data may be misleading as for example Merton is one of the few boroughs that have restrictions until 11pm, most end at 6.30pm.

Love Wimbledon are very happy to work with Merton and have suggested a number of initiatives where we could work together on in order to improve air quality.

LOCAL FAITH GROUP

A petition has been presented with 184 signatures. The petition stated 'This is going to affect many of our congregation who attend for prayers.

THE WIMBLEDON SOCIETY

The Wimbledon Society supports the objective of improving air quality, particularly in highly populated areas. They believe the objectives could also be achieved by environmental improvements, pedestrian high streets, and reducing traffic from key congested areas.

They are concerned that CPZs were originally set up with a charging scheme that covered all costs associated with the CPZ. Any excess (if produced) would be reinvested for improvements. If there is increased revenue in the future then this must be transparent to residents and accounted for.

Further concerns raised were in relation to the impact on front gardens and shopping areas, particularly small parades etc. They believe that more front gardens will be paved over and suggest that this should be restricted. In addition, to secure no reduction to customers to shops and small parades there should be free 30 minute parking options in order to reduce the impact on local retail establishments.

ST JOHNS AREA RESIDENTS ASSOCIATION.

The Association objects to the proposals because the increased charges are significantly above inflation and are not borough wide. They will have a detrimental financial effect on certain residents/visitors and they believe there is no level of assurance that they offer value for money. In addition, the association would like information regarding how the additional revenue will be spent.

THE WIMBLEDON EAST HILLSIDE RESIDENT ASSOCIATION (WEHRA)

WEHRA fully support the objective of improving air quality. However, they would like more evidence of the problem in order to have a level of reassurance that the proposals adequately address the issues raised.

They are concerned about the number of HGVs around Wimbledon because of a concrete facility in Weir Road. They would also like to be provided with further information about the council's response to the proposed expansion at Heathrow.

They suggest that Merton could help to meet their objectives by improving cycling opportunities in the borough, reviewing planning applications that adversely affect air quality, and by improvements to public transport.

NORTH WEST WIMBLEDON RESIDENTS ASSOCIATION (NWWRA)

NWWRA fully support the objective of improving air quality. However, in order to have a level of reassurance that the proposals address the issues, they have asked for evidence that higher permit charges lead to a reduction in car ownership.

They felt that residents in CPZs with no off street parking, would be unfairly burdened, those in a CPZ for less than a year should not be subject to these increases and some CPZs should be in different PTAL zones. In addition, hybrid vehicles should be recognised and awarded discounts similar to those offered to electric vehicles.

They suggest that Merton Council could help to meet their objectives by stopping idling cars, campaigns to promote alternative transport methods, improvements in public transport and interventions that reduce the number of highly polluting vehicles on the roads in Merton.

SOUTH RIDGWAY RESIDENTS ASSOCIATION

The Association felt that the proposed charges were too high, unfair, did not affect those with a drive or garage and unduly disadvantaged those in a CPZ despite the fact that all motorists contributed to air quality and pollution. In addition, they were concerned that when the original CPZ charges were introduced, they were initially just to cover costs. The new proposals appear to be an additional tax.

They were also concerned about the impact on the high street and retail generally. In conclusion, they felt that charges should be kept as low as possible and were therefore opposed to the proposed increases.

APOSTLES RESIDENT ASSOCIATION

The Association were opposed to the proposed increases as they are too high, did not affect those with a drive or garage and unduly disadvantaged those in a CPZ zone. As such, they feel that the rationale to reduce pollution was not supported. They also raised concerns that the charges when the CPZ was set up; were initially just to cover costs but now appeared to be an additional tax.

Finally, if the proposed charges were to be approved and implemented, then any additional funds generated should be spent on road improvements.

RAYNES PARK RESIDENTS ASSOCIATION

The Association were opposed to the proposed increases as they are too high, did not impact on those with a drive or garage unduly disadvantaged those in a CPZ, despite the fact that all motorists contributed to air quality and pollution. In addition, they were concerned that the charges when the CPZ was set up were initially just to cover costs but now appeared to be an additional tax.

The Association was opposed to the proposed increases with regard to on street parking, because of the impact felt by the retail outlets in the Town Centre.

The Association had requested more free 20-minute parking bays in certain areas within Raynes Park. They felt that the shopping experience within Merton should be supported, rather than being hindered, by increased parking charges.

THE RESIDENTS ASSOCIATION OF WEST WIMBLEDON RAWW

RAWW stated that the proposed increases are not fair for three main reasons:

- The negative impact on local shopkeepers and businesses.
- Housebound residents
- Residents who do not have off street parking, particularly those employed in essential services.

STOP PARKING CHARGES INCREASES!

An anonymous petition with approximately 200 signatures. The text reads. *'The council are proposing to increase the hourly parking charge from £1.20 to £3.00 per hour. This will have a devastating effect on our business, so we are asking you if you will support us opposing these increased charges.'*

STATUTORY CONSULTEES

There was only one response, from the Metropolitan Police, who raised no objections.

PERMIT CHARGES

The sections below addresses the points raised in the consultation.

<p>Permit charge too high & ability to pay</p>	<p>Respondents stated that the proposed permit charges are too high. There were a wide range of reasons recorded, the following are the key reasons:</p> <ul style="list-style-type: none"> - too high an increase - charges being used as a tax - proposed charges are well above inflation - the council tax has already increased significantly so the impact of increased car parking charges is a further financial blow - the proposed increase would not change driver behaviours and car ownership. <p>Many respondents stated that for a variety of reasons, they needed a vehicle and consequently the proposed charges would have a significant impact on their budget.</p> <p>Council response: The proposed charges are seeking to achieve the key policy objectives set out in the report.</p> <p>The council has to strike a balance in achieving its obligation to improve air quality, public health outcomes, management of the highway and sustainable active travel.</p> <p>The council is proposing a range of charges, which will challenge driver choice of travel across the borough, but also make it easier to use public transport and waling/cycling instead of the car.</p> <p>There are very few direct levers available to stimulate driver behaviour, and the council believes the rationale for setting the new parking charges is about giving people the right nudge and opportunity to make the right choices.</p> <p>In setting out its measures of success, the new charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets – to benefit residents and businesses alike.</p> <p>Local authorities are not permitted to use parking charges solely to raise income. When setting charges, we must instead focus on how the charges will contribute to delivering the councils traffic management and other policy objectives.</p>
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<p>Permit charge emission based</p>	<p>We received a high number of comments from respondents suggesting charges should be emission based and reflecting the size of the vehicle. The comments regarding this subject were wide ranging and included the following:</p> <ul style="list-style-type: none"> - There should be direct links made between the vehicle and the contribution to pollution etc. based on their emission. - A number of comments related to the size of the vehicle as there are large disparities and this can be significant re parking bay usage. <p>Overall respondents felt that the owners of vehicles contributing the most to pollution should pay the most, rather than a standard charge for all diesel or petrol resident permits.</p> <p>Council response: The council acknowledges these views and is currently undertaking a review of emission based charging. The report will be presented to Cabinet later in the year and all the comments received in this consultation will be considered as part of this review.</p>
<p>Cheaper first permit</p>	<p>A small number of respondents stated that they felt the first permit in each household should be free or a lot cheaper.</p> <p>Council response: Charges have been considered and set at levels, that will challenge driver behaviour and choice with the aim of reducing car use and ownership. The council is mindful of economic challenges facing many residents and visitors to the borough, but also needs to meet obligations to reduce poor levels of air quality and improve public health, increase cycling, walking and use of public transport. There have been no increases to parking charges for several years.</p> <p>The new charges are considered a reasonable amount to nudge residents and visitors to consider their car use and alternative travel choices.</p>
<p>Permit charge should be a borough wide charge</p> <p>Only penalising those in CPZs</p>	<p>A number of respondents stated that the charges should be borough wide. Respondents felt that all CPZ residents permit charges should be the same, rather than the charges based on location/CPZ and the period of the controlled parking.</p> <p>A number of respondents commented that the proposals are only penalising those that reside within CPZs although all motorists within the borough contribute to the poor air quality, congestion etc.</p> <p>Council response: The council acknowledges that there are differences in the proposed charges. The PTAL ratings and the period of the controlled parking is the basis for the proposed permit charges with the objective of encouraging motorists to use alternatives such as public transport. The charge reflects the ease of the option to use for example, public transport and/or the demand within the CPZ for parking.</p>
<p>PTAL supported</p>	<p>We received a limited number of comments supporting the PTAL basis of our proposal. Respondents agreed that certain areas in Merton are well served by public transport and understood/supported PTAL. Because of other comments,</p>

	<p>received regarding PTAL we have reviewed the proposed tiers based on PTAL CPZs to reflect the ratings.</p> <p>Council response: The Council acknowledges this support by a number of respondents.</p>
<p>PTAL not supported</p>	<p>There were a number of respondents stating that they did not support PTAL. The main reasons for not supporting PTAL are as follows:</p> <ul style="list-style-type: none"> - Public transport is not a substitute for all vehicle journeys - Residents stated they already pay a premium to live near good transport links and use them as much as the can but public transport does not meet every journey need. - Living near public transport does not mean it is easily accessible for all – lack of lifts, escalators, etc. not user friendly for families, those needing to carry goods/buggies or with mobility problems. <p>A key theme was those that live near public transport use their cars less because of the links; but still need a car for those journeys that public transport does not cover.</p> <p>Council response: There is a significant difference in transport infrastructure and accessibility dependent on where a resident lives, visits or works within the Borough. This is presented in the form of a ‘Public Transport Accessibility Levels’ (PTAL) as set out by TfL and formed part of the review. TfL have grading’s for each area of London – ranging from the highest to the lowest.</p> <p>It is therefore easier in principle for a person living, visiting or commuting to a high PTAL rated area to use alternative sustainable of transport, compared to residents in low PTAL rated areas.</p> <p>It should be noted many existing and new developments in high PTAL rated areas are already car free and a Permit might not be purchased, and this forms part of the current planning process.</p> <p>A recent Residents Survey highlighted public transport provision throughout the borough as most valued by residents.</p> <p>Merton is very well connected to the public transport network with 10 mainline rail stations served by Thameslink (Wimbledon Loop), South Western Railway and Southern Rail services. A network of 28 bus routes also serves the borough; including 7 night buses, several of which run 24hrs a day.</p> <p>Wimbledon Station serves as a sub-regional transport hub and is served by National Rail train services (South Western mainline), London Underground (District Line), London Trams and bus services. The suburban station at Mitcham Eastfields puts the east of the borough within 25 minutes of central London (Victoria and Blackfriars).</p> <p>The Northern London Underground line also runs through the borough and terminates at Morden, (including night-time service, which runs on Fridays and Saturdays every 8 minutes between Morden and Camden Town and</p>

	<p>approximately every 15 minutes from Camden Town to High Barnet and Edgware).</p> <p>Following the consultation process, the council has reviewed the PTAL rating for each CPZ and walking distances to main line, tram and underground stations access, and it is recommended that Controlled Parking Zones VNE, VNS, VN, VQ, VSW, VSW1, VSW2, be re-categorised as Tier 2 from Tier 1. as shown in Appendices 7, 7a, 7b and 7c.</p>
2nd & 3rd Higher charge	<p>We received a number of comments in relation to the cost/charge for the 2nd, 3rd, plus, resident permit. The respondents felt that one vehicle per address was reasonable but multiple vehicle ownership had a significant impact on all residents at a given area/CPZ. Multiple vehicle ownership creates a higher demand on the supply of available parking bays within a given address/CPZ often causing difficulties in finding a parking bay near to where the vehicle owner resides. Consequently, the respondents felt that if the second third fourth etc. resident permit significantly increased in cost this would deter multiple vehicle ownership unless essential.</p> <p>Council response: The council has reviewed the above response, notes the support and has decided to progress with the current proposed charges for second, third and fourth resident permits.</p>
Too low	<p>There were a number of comments received from respondents recording their views that they felt the cost of resident permits were too low. These respondents felt that the resident permits despite the increases, were still too low in order to achieve the objectives in the proposed policy.</p> <p>Council response: The council notes the support for its proposed charges. Once they are implemented, the council will monitor their effectiveness.</p>
Annual Visitor Permit	<p>We received comments regarding the annual visitor proposal. The comments raised concerns about the proposed increase to the annual visitor permit.</p> <p>The respondents indicated that they have currently purchased the permit for their use (particularly if they own or have access to a variety of vehicles), personal visitors, visiting tradespeople and on occasion staff such as nannies, carers etc. The respondents felt that the proposed increase is too high.</p> <p>Council response: The proposed annual visitor permit is charged at a premium because of the flexibility it offers by not being vehicle specific hence the limit of one per address. It should be noted that the council acknowledges that for certain residents this permit is not the ideal permit and they have options as part of the amendments following consultation as follows:</p> <ul style="list-style-type: none"> - Where the current annual visitor permit is used for and by carers; they will be able (if eligibility met) to apply for a Blue Badge. - In certain cases, it may be more financially feasible for residents with current annual visitor permits to move to visitor permits (half day or full

	day) if used for ad hoc visitor or tradespeople.
Limit the number of permits per address	<p>A number of respondents stated the issue of resident permits should be limited. The respondents felt that one vehicle per address was reasonable but multiple vehicle ownership had a significant impact on all residents at a given address. Multiple vehicle ownership creates a higher demand on the supply of available parking bays within a given address/CPZ often causing difficulties in finding a parking bay near to where the vehicle owner resides. Consequently, restricting the number of permits issued to any address would reduce the demand on parking bays.</p> <p>Council response: The current proposal does not include limiting the number of resident permits per address, but does include charging more for each resident permit purchased.</p>

Charging Rationale

<p>Does not address the issue of air quality</p>	<p>A number of Respondents stated that they felt the proposals would not address the issue of improving air quality. They made a variety of suggestions as to other factors that had an impact on air quality opposed to car use.</p> <p>Council response:</p> <p>The London Borough of Merton historically and presently, continues to exceed targets and its legal objectives for local air pollution, including Nitrogen Dioxide (NO₂). The Government, local authorities and policy makers are being continuously challenged around delivering their responsibilities to reduce pollution, and are often criticised for lack of action or being slow to respond.</p> <p>Air quality has been identified as a priority both nationally and within London, where pollution levels continue to exceed both EU limit values and UK air quality standards. Pollution concentrations in Merton continue to breach the legally binding air quality limits for both Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀). The air quality-monitoring network, run by Merton, has shown that the UK annual mean NO₂ objective (40µg/m³) continues to be breached at a number of locations across the borough including Colliers Wood, Morden, Tooting and South Wimbledon. In some locations, the NO₂ concentration is also in excess of the UK 1-hour air quality objective, which indicates a risk not only to people living in that area but also for those working or visiting the area. Reducing vehicle numbers (car usage) and different types of vehicle has a direct and tangible benefit on air quality.</p> <p>In Merton, an Air Quality Management Area (AQMA) has been declared for the whole Borough with four locations identified as having high levels of pollution and human exposure. These are in the main centres of Mitcham, Morden, Raynes Park and Wimbledon.</p> <p>Poor air quality in Merton comes from a number of sources, but our legal exceedances are almost entirely due to road transport. Road transport accounts for approximately 60% of emissions of NO₂ in our Borough. Simply put, this is due to traffic including the nature of vehicles on our roads, the volume of vehicles and the number of trips that they take.</p>
<p>Dropped kerb properties unaffected</p>	<p>There were a number of comments received highlighting that residents who have dropped kerbs were not affected by the current system or the proposed changes. Respondents felt that it was unfair that those properties with dropped kerbs and/or other available off street parking such as garages, despite having one or more vehicles would not have to purchase any permits. Consequently, these residents will not be subject to the proposals thereby contributing to the objectives of the proposals.</p>

	<p>Council response: The council notes these points and wishes to address the reliance and use of vehicles across the borough, not just within CPZs. A key reason, why on street and car park charges are also being proposed at the same time, is to deliver a cohesive policy to encourage a change in driver behaviour.</p> <p>Unfortunately, we have very limited powers but do use them when we can. One example is, many existing and new developments in areas close to good public transport provision are already 'car free' and a permit may not be purchased, and this forms part of the current planning process.</p> <p>CPZs are traditionally areas where there are good transport links and have been implemented because of congestion and demand for spaces, often from vehicles from outside the area to access transport. The proposed charges are also calculated on enforcement cost and higher charges have been set to unforce CPZs that have longer hours of operation.</p>
Tier structure / not fair	<p>We received comments stating that the tier structure in the proposal is unfair. The respondents felt that the current proposal was unfair for a number of reasons. The reasons ranged from for example, disparity based on geographical, vehicle, financial, whether in CPZ or not and PTAL ratings. Most respondents felt that the charges should be equal across the borough and not dependent on any particular disparity because all vehicles add to pollution, congestion and therefore air quality.</p> <p>Council response: The council's proposal is based on a number of key factors in order to ensure that the greatest impact is achieved on behaviour where the resident has the best alternatives available. For example, where a resident has access to the best transport links in the borough the permit is more expensive. If the council charged all residents the same price, we would have less leverage on changing behaviour in those areas where there are alternatives available.</p> <p>The council has a duty and responsibility to protect and promote good living conditions throughout the borough they also need to tackle the poor air quality.</p>
Parked cars do no pollute	<p>We received comments stating that parked cars do not pollute. The council understands this view, but vehicles are not purchased to never be used; hence, all vehicles are used to varying degrees. It could be argued that the less a vehicle is used the greater the scope to use alternative options such as car club, public transport etc.</p> <p>Council response: No car is bought just to be parked; it is bought to be driven. How often and how far does vary, but it will be driven. The principle of charging based on location to public transport and local amenities is that it is easier to travel without the car on a day-to-day basis, than from locations with poorer access to amenities and public transport.</p>

<p>Negative impact on business</p>	<p>Respondents were concerned about how the proposed charges will affect the high street and retail generally within Merton. In particular, the sole trader running a small retail shop. There is concern that the increased 'on street charges' will result in less visitors to certain areas and as a consequence a reduction in their income.</p> <p>Council response: The council is mindful of these challenges and received written submissions from the business sector, including the Wimbledon Society and Love Wimbledon BID.</p> <p>Merton actively supports all businesses in the borough and works with a number of businesses and organisations in development initiatives.</p> <p>In order to assist businesses and support the nighttime economy, the Council recommends a reduction in charges in the underused car parks of St Georges Road and Queens Road to a flat fee of £2 between 6pm and 11pm.</p> <p>The Council will also continue to continue its commitment to the free twenty-minute bay parking.</p> <p>Research shows that when streets are improved, retail values increase, more retail space is filled and there is a 93% in people walking in the streets, compared to locations that have been improved. The research has also found that people walking, cycling and using public transport spend the most in their local shops, 40 per cent more each month than car drivers do.</p>
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Through Traffic

<p>Congestion traffic flow / traffic management 20mph</p> <p>Through traffic</p> <p>ULEZ (extended congestion charge)</p>	<p>Respondents raised issues regarding the impact of traffic flow, traffic management schemes within the borough including the 20 mile per hour initiative and ULEZ (extended congestion charge). All of these issues the respondents believed also had an impact on air quality within the borough.</p> <p>Council response: Merton Council's transport policies are focused towards mitigating against congestion, car use and road safety through a range of physical and educational measures with a strong emphasis on road safety and encouraging sustainable transport alternatives for short trips.</p> <p>The council will continue to adopt initiatives that will continue to address congestion, air quality and road safety.</p> <p>The Mayor for London has rightly placed growth, healthy people and places as the central theme of his adopted transport strategy. Merton Council is supportive of this strategy and in particular the adoption of healthy street indicators when designing public realm improvements.</p> <p>The Mayor of London's ambition is to make London a zero carbon city by 2050. As a local authority Merton will be following this lead in improving air quality and consider initiatives such as the ULEZ charge which targets older and higher polluting diesel and petrol vehicles. Processes are in place to</p>
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	<p>phase out purchasing of diesel buses; introduce hybrids and electric buses; Retrofit scheme outside central London. 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. We are also working with TfL to identify suitable sites Rapid Charging points for taxis.</p> <p>The London Mayor is committed to making London's bus fleet cleaner with all TfL buses expected to be electric or hydrogen by 2037. The council believes that TfL's bus replacement does not go far enough and should be accelerated so that the whole of greater London can enjoy the benefits of cleaner buses much sooner. It will continue to lobby TfL to make buses in Merton cleaner</p>
Address rat runs	<p>Some respondents felt that the 'rat runs' within the borough that added to the congestion issues should be addressed.</p> <p>Council response: There are areas across the borough where motorists rat-run through local streets or cruise streets looking for parking spaces. The council will work with residents to investigate and implement measures to reduce through traffic on local roads, including measures, such as filtered permeability schemes where access is restricted to cyclists only as part of a wider healthy neighbourhood proposal.</p>
ULEZ	<p>Respondents suggested that Merton should implement ULEZ within the borough.</p> <p>Council response: We are currently undertaking a project to consider the use of Clean Air Zones in the borough to tackle through traffic. This commitment forms a part of our Air Quality Action Plan and shows that we are committed to using all the powers we have available to us to tackle transport pollution.</p>

Public Transport

Public transport infrastructure weakness	<p>Respondents recorded comments regarding the public transport infrastructure. There were a wide range of reasons recorded, such as reliability, buses are full in peak hours, and the number of closures over the weekend in particular, strike action, lack of links between key routes and general accessibility issues.</p> <p>Council response: The Council will continue to lobby TfL to improve bus services in areas currently poorly served by public transport to provide a reliable alternative to car ownership and increase access to employment and services. The cost of bus travel in London has been frozen and the Mayor has introduced 'Hopper' tickets allowing passengers to use more than one bus to complete their journey.</p> <p>Transport for London continues to explore options for increasing public transport capacity across the capital, including potential extension to the</p>
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	<p>tram network in Merton (Sutton Link) and other capacity enhancements to the underground network, all of which are supported by the council.</p> <p>The council works closely with TfL and Network Rail in ensuring that the highway infrastructure accommodates the efficiency of the public transport services. This include accessibility; bus stops, bus shelters; countdowns etc.</p> <p>The council has recently supported South Western Railways in its “Access for All bid” to the Department of Transport for step free access at Rayne’s Park and Motspur Park Stations. The council is also pushing for step free access at Wimbledon Chase Station through the planning process and delivery of a westbound access ramp for Haydon’s Road Station. Opportunity is also available to provide a second step free access for Morden Road Tram Stop.</p> <p>Improving connectivity in areas with a low Public Transport Accessibility Level (PTAL) score, especially by bus or other demand lead services offers an effective approach to support growth, access to employment and services as well as reducing reliance on private cars.</p>
<p>Electric buses/ taxi/ tram and hybrids.</p>	<p>A number of respondents stated that certain vehicle types are a major cause of air pollution and other environmental concerns.</p> <p>Council response: The London Mayor is committed to making London’s bus fleet cleaner with all TfL buses expected to be electric or hydrogen by 2037. The council believes that TfL’s bus replacement does not go far enough and should be accelerated so that the whole of greater London can enjoy the benefits of cleaner buses much sooner. We will continue to lobby TfL to make buses in Merton cleaner.</p> <p>The Council will lobby TfL, GLA and London Mayor to significantly accelerate the roll out of electric and hydrogen buses in outer London.</p>
<p>Public space air quality</p>	<p>Representations were made specifically in respect of the improvement made in Putney High Street and air quality. The information below shows the range of actions required to make a difference. All are action Merton would possibly consider and take appropriate action.</p> <ul style="list-style-type: none"> - Marked reduction in air pollutant levels along Putney High Street – this is particularly over the last 2-3 years and followed a study carried out some 5-6 years ago which showed that the bus fleet was responsible for many of the pollution issues in the local area. - This was not helped by the canyon layout of the street, which restricted dispersal of pollutants. The council and local groups successfully lobbied TfL to trial a fleet of low emission buses. This is now a permanent feature of Putney High Street and TfL has since introduced low emission bus zones in a few other select spots including near Clapham Junction also in Wandsworth Borough. - Last year, TfL also piloted new smart technology, which improved traffic flows along Putney High Street and reduced the numbers of

	<p>vehicles tailing back on the high street. Whilst this does not reduce the volume of vehicles, it does prevent the build of pollutants in a high pollution area as vehicles are generally held elsewhere and the flow along Putney High Street is relatively free.</p> <ul style="list-style-type: none"> - This pilot is also now a permanent feature on Putney High Street. The figures for pollutant levels have noticeably reduced and while still over recommended guidance levels, it is much closer to compliance and it is anticipated that this will continue as these new measures continue to have an effect. - Loading and unloading restrictions were also introduced in Putney High Street. This also has been the first of its kind for a London borough.
Cost of public transport	<p>Respondents highlighted that they currently did not use public transport due to the cost.</p> <p>Council response: The Council does not have any jurisdiction over the cost of public transport although the Council does work with TfL to lobby for value for money transport solutions for its residents.</p>

Sustainable Transport

More electric vehicles and charging bays	<p>Respondents highlighted that there were reasons why they had not to date seriously considered or purchased an electric vehicle. The two main reasons was the cost of electric vehicles and that concerned about limited electric charging stations.</p> <p>Council response: The council is also developing its infrastructure for electric vehicles. Merton's ambition by 2021/22 is to facilitate 125 electric charge vehicle points across the borough, including fast, rapid and residential charge points. There are currently 94 in operation.</p> <p>To encourage the uptake of electric vehicles, Merton Council is working with Source London, London Councils and Transport for London to put in place a mix of electric vehicle charging solutions. The London Plan and Merton's own Local Plan also requires that developers install a percentage of electric vehicle charging points within any new development with off-street parking.</p> <p>The council is working toward a target of 85% of all households being within 10-minute walk or 800m of a charge point by 2020/2021. To date there are around 94 active electric vehicle charge points in the borough, including 3 rapid charge stations.</p>
More car sharing, including Car Clubs	<p>Respondents stated that they would be likely to use car clubs if there were more car club bays, pick up/drop off points and charges were less. They felt that the car club availability would directly influence them to use a car club option rather than owning a personal vehicle.</p> <p>Council response: Merton is aiming to ensure that every resident has access to car club vehicles. There are 193,500 car club members in London and around ten car clubs. Transport for London (TfL) has committed to aiming for one million</p>

	<p>members by 2025. They offer a convenient and affordable service, while at the same time reducing overall car usage.</p> <p>Car clubs can provide you with an alternative means of accessing a car when you need one, without all the cost or hassle of owning one yourself. You can find car club cars parked on street throughout Merton.</p> <p>There are three car club companies available to the public in the borough, Bluecity, Zipcar and other TfL operators. There are currently on average over 60 vehicles operating in Merton with over 6,000 members.</p> <p>Providers will also be encouraged to adopt a greater proportion of all electric vehicles and move towards common access approaches e.g. single booking apps and sharing of data to boroughs and TfL.</p>
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Representations stating a need to own/access a car

<p>Disabled / elderly/ family/ work/ shopping/ weekend / visits to recycle centres / occasional use</p>	<p>Many respondents recorded that for a variety of reasons they required a car or access to a car:</p> <ul style="list-style-type: none"> - work purposes; often tradespeople/workers that had equipment for example required for their work that they would not be able to carry on public transport. - required access to a vehicle in order to transport family members, disabled relatives/friends, to meet carer needs, and undertake journeys that were not possible on public transport. - required access to a car so that they could undertake long journeys often at weekends. <p>Council response: The council accepts current life styles are often based around the convenient use of the car. This is an issue, which has evolved over many years, and the car is part of day-to-day life. However, current car use and numbers along with associated emissions are no longer sustainable; car use in London simply has to reduce. The council will continue to work with partners to help make the move away from car ownership easier. The council will however identify groups and individuals where the need to have easy and convenient access is high and ownership is still required.</p> <p>Improving connectivity in areas with a low Public Transport Accessibility Level (PTAL) score, especially by bus or other demand lead services offers an effective approach to support growth, access to employment and services as well as reducing reliance on private cars.</p> <p>Those residents who only require a car at the weekends could use the car club facilities in Merton.</p>
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Cycling

<p>Cycle lane improvement & promotion</p>	<p>A number of respondents stated that they would consider cycling as an alternative source of transport if there were more cycle lanes available, cycle lanes were segregated and the existing cycle lanes were improved. Segregated cycle lanes would encourage greater use by a wider range of cyclists.</p> <p>A number of respondents felt that Merton could encourage more motorists to cycle by promotion campaigns highlighting the cycle lanes in Merton and the advantages of cycling.</p> <p>Council response: Over the last 6 years, Merton Council has spent £19.2m on a number of LIP 1 & 2 projects. This includes £4m on cycle related schemes (including cycle training). Approximately 6 km of cycle routes have been delivered alongside 651 additional cycle parking spaces.</p> <p>The Council has limited annual funding to improve cycle provisions throughout the borough. This includes improvements to existing cycle lane; new cycle lanes; Quietways; cycle parking; road safety and cycle training.</p> <p>The Council will continue to be committed to promoting cycling.</p> <p>We offer training sessions to teaching staff and parents, supplying training bikes if necessary and have supported the Met Police with the Changing Places Programme showing HGV drivers and cyclist sight line dangers when cycling on road. Dr Bike Maintenance days are provided at 2 town centres to enable more cycling in the borough. We provide information on the Recycle A Cycle Scheme, which advises victims of bike theft to obtain a recycled bike.</p>
<p>Cycle safety</p>	<p>A number of respondents raised concerns about safe cycling within the borough.</p> <p>Council response: The council will continue to undertake reviews of cycle safety, invest in cycling infrastructure, closely monitor accident statistics and take steps to continually improve cycle safety, which includes training as mentioned above.</p>
<p>Better cycle parking facilities</p>	<p>Respondents highlighted that increasing the number of parking opportunities in Merton and access to bikes would encourage them to cycle within the borough.</p> <p>Council response: Cycling - as part of an integrated transport solution and to contribute to modal shift. Working with colleagues in Future Merton a number of options and costings are being considered including covered cycle parking areas with improved security and lighting in each of or car parks, again with the view to increasing the provision in the future.</p> <p>Approximately 6 km of additional cycle lanes have been delivered as well as 651 new cycle parking spaces.</p>
<p>Hire</p>	<p>Respondents stated that it would encourage them to cycle if they were able to hire bikes within Merton.</p> <p>Council response: There is significant potential to encourage residents to cycle more, especially for short commuter and leisure trips. The council is therefore working with TfL and neighbouring boroughs to facilitate a dock-</p>

	<p>less cycle hire scheme in Merton. This will enable residents to collect a hire bike from a number of designated cycle collection/drop off points across the borough and cycle to their destination.</p> <p>It is likely that a future Merton cycle hire scheme will operate from dedicated, predominately on-street collection/drop off bays. The council would particularly welcome operators that include electric bikes within their offer to help reach a wider mix of users, who might not otherwise cycle.</p>
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Environmental Considerations

<p>Idling/engine running</p> <p>More environmental/trees and green spaces</p> <p>Will encourage more dropped kerbs/ Less front gardens with greenery</p> <p>Road humps</p> <p>Car free/ pedestrianisation</p> <p>Heathrow</p> <p>Wimbledon Taxi</p> <p>Planning</p>	<p>Respondents raised a number of concerns regarding vehicles in relation to the environment within Merton. For example, their concerns ranged from vehicles with their engines idling, residents paving over front gardens thereby reducing the green spaces, they would like to see more trees and green spaces and a review of the number of road humps. There were some specific concerns regarding Merton's response to the possible expansion to Heathrow, the number of Taxis in Wimbledon and the possibility of increasing the number of car free or pedestrian only areas.</p> <p>Council response: Merton has a clear commitment to tackle anti-idling and have installed 100 signs at locations in the borough with a further 100 planned. We are organising anti-idling events throughout the borough and will be formalising the enforcement process this year.</p> <p>Through its spatial policies contained in the London Plan and the Council's own emerging Local Plan the council proactively encourages permit free development, especially around town centre locations and where access to public transport is good or could be improved through funded investment. The council is looking to rebalance the way streets are used so that they become places where people choose to walk or cycle and are not dominated by private cars and service vehicles. This could include the provision of small parklets or public spaces where people can sit and socialise.</p> <p>The provision of a third runway and expansion of Heathrow Airport recently cleared a major legal hurdle, which increases the likelihood that the plans will proceed. Whilst the council does not support this expansion. Should proposal pass the planning stage the council will work with neighbouring boroughs to ensure that transport impacts are mitigated as far as possible.</p> <p>The Mayor of London's ambition is to make London a zero carbon city by 2050. As a local authority Merton will be following the Mayor of London's lead in improving air quality and consider initiatives, such as the future expansion of the Ultra-Low Emission Zone, London-wide Low Emission Zone and Clean Air Zones, which target older and higher polluting diesel and petrol vehicles.</p>
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	<p>TfL is phasing diesel buses in favour of hybrids, electric and hydrogen buses. The Council will continue to lobby TfL to accelerate the pace of transition to these cleaner vehicles.</p> <p>As of 2018, all new black taxis must be zero emission capable and these vehicles cannot be older than 8 years. The Mayor for London has put in place incentives to speed up this transition.</p> <p>We are also working with TfL and Source London to identify suitable sites for rapid charge stations for taxis and other high usage vehicles. The council will work with the London Taxi Office to try to reduce the amount of engine idling.</p> <p>Where applications for residential crossovers meet the required access and design criteria the council cannot unreasonably refuse requests.</p> <p>The council's broader approach to off-street parking places is to encourage the retention of planting and the use of permeable surface materials.</p> <p>Road Humps - Historically area wide traffic calming measures in the form of horizontal and vertical deflections were introduced to reduce speed and rat running. With the borough wide 20mph speed limit, existing traffic calming features will ensure that motorists travel at lower speed.</p> <p>New development can allow us to establish sustainable travel patterns at the outset by helping to deliver better supporting infrastructure through financial or in-kind contributions, such as wider footways and land dedication to provide new facilities or linkages. The council will encourage developers to look beyond their site boundaries when seeking to mitigate the impacts of their proposals.</p> <p>The council is keen to promote more cycling and to optimise cycling potential in the borough, especially around town centres and other areas with good connectivity by public transport. This means ensuring that new development provides good quality cycle parking integral within the proposals, including ensure that visits are also confident in cycling to a location by installing secure short stay cycle parking.</p>
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Vehicles

<p>Government said buy diesel</p>	<p>A number of respondents highlighted that they were encouraged by the government to purchase diesel vehicles.</p> <p>Council response: In 2001, a vehicle excise duty (VED) system was introduced which made road tax charges cheaper for vehicles, which emitted less CO2 emissions. Typically, diesel vehicles emit less carbon dioxide (CO2) emissions than petrol cars, which saw more people, opt for diesels because they were cheaper to tax and perceived to be better for the environment.</p>
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	<p>However, despite diesel cars emitting less CO2, they do produce disproportionately high emissions of nitrogen dioxides (NOx) and particulates, both of which contribute greatly to local pollution levels and poor air quality.</p> <p>Merton Council accepts that previous governments encouraged the uptake of diesel vehicles to help reduce carbon emissions. That position has now reversed.</p>
EURO 6 Rating	<p>A number of respondents stated that they felt Euro 6 accredited vehicles should be acknowledged and reflected in the proposed parking charges. Effectively the respondents felt that despite buying a more efficient vehicle there was no benefit in the permit tariffs.</p> <p>Council response: It is widely known that diesel vehicles produce disproportionately high emissions of local air quality pollutants such as nitrogen dioxides and particulates. Under Euro classifications, certain newer diesel vehicles were purported to be less polluting.</p> <p>The council acknowledges these views and is currently undertaking a review of emission based charging. The report will be presented to Cabinet later in the year and all the comments received in this consultation will be considered as part of this review.</p>
HGV	<p>A number of respondents highlighted that there were a large number of HGV vehicles travelling within the borough. Some specific areas in the borough attract more HGV vehicles on a regular basis. The respondents felt that they were adding significantly to the poor air quality.</p> <p>Council response: We accept that HGV's contribute to poor air quality. There are existing controls to regulate these vehicles through a London wide Low Emission Zone which is currently being tightened by the GLA.</p>

Car parks

More car parks and improvements	<p>A number of respondents felt that Merton should increase the number of car parks available throughout the borough and the current car parks should be improved.</p> <p>Council response Merton is committed to continue improving its car parks and one of our objectives is to secure an accreditation for our car parks. This accreditation will deliver improvements such as; improved lighting in car parks, access, security, increased cycle spaces and more signage.</p>
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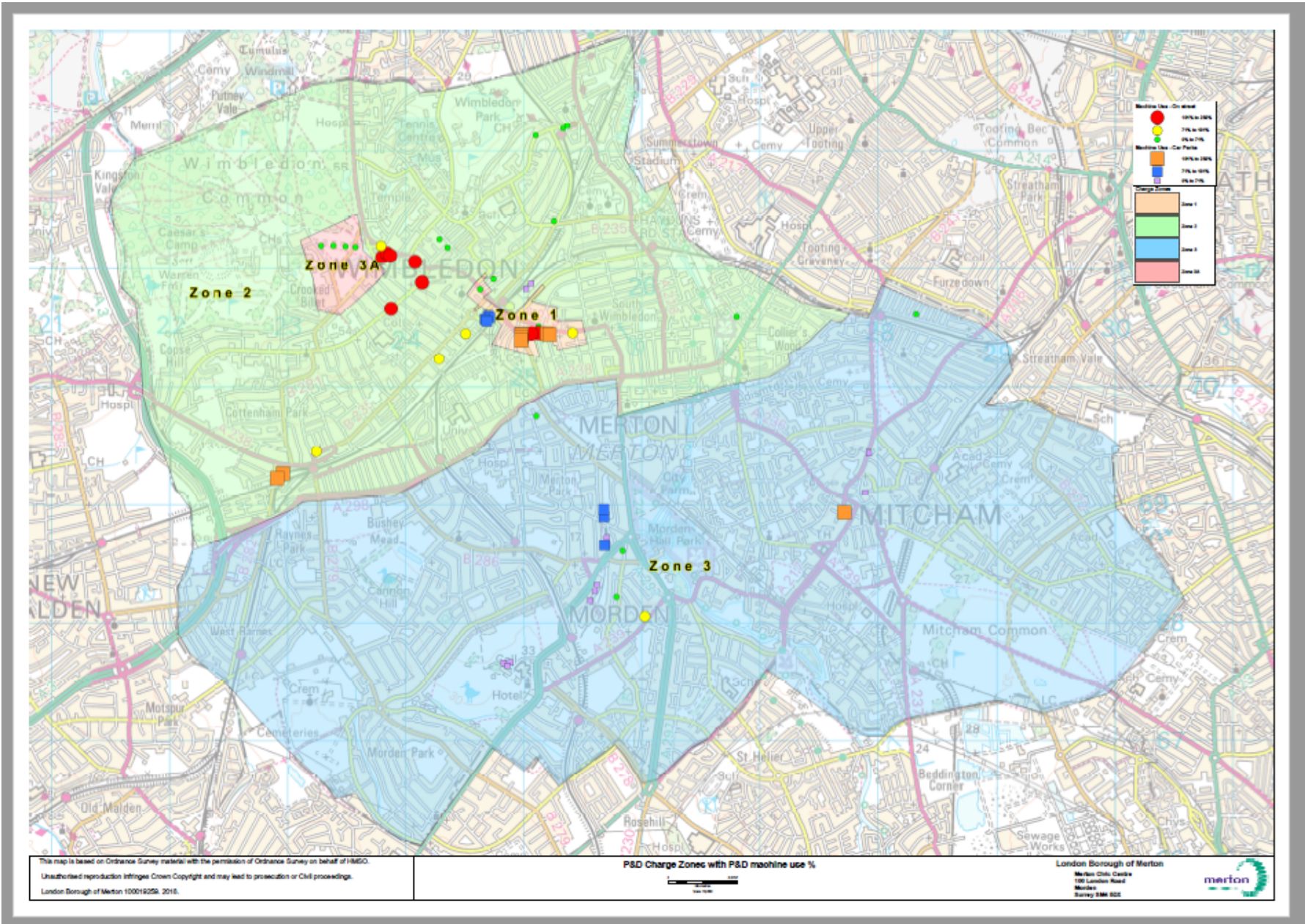
Schools

Car Free School Zones	<p>A number of respondents included comments on schools, including:</p> <ul style="list-style-type: none"> - increased traffic with children being driven to school - during the school holidays the roads were significantly less congested - imposing car free zones around schools would be beneficial. - a number of respondents recommended that children should be encouraged to walk or travel to school by public transport.
Catchment area/ walk to school	<p>Council response: The Council has identified four areas to trial temporary road closures outside schools during morning and afternoon peak periods.</p> <p>The council in partnership with the Police, Transport for London and schools themselves, work to improve road safety near schools.</p> <p>The management of road safety is in line with the Mayor of London’s strategy for healthy streets. The council has a rolling programme of works with individual schools that includes engineering measures:</p> <ul style="list-style-type: none"> - including localised 20mph speed limits to make the area outside the school safer; - support the school with their travel plans - provide soft measures such as cycles and scooter training as well as Kerbcraft. <p>All initiatives are designed to encourage a reduction on congestion generated by school traffic.</p> <p>Too many parents still choose to take their children to school by car increasing congestion on the road network and in close proximity to the school, especially during the morning and evening peak. At school home time, parents frequently arrive early to obtain nearby parking spaces and then sit waiting in their cars with engines running (or idling), all of which contributes to poor air pollution in Merton and across London.</p> <p>Merton also has a number of schools, that tend to have wider catchment areas across borough boundaries. This results in higher numbers of parents choosing to drive their children to school. By complementing school travel plans with a mix of physical and enforcement interventions, more of these trips could be made by foot for some or the entire journey. Improving the reliability and capacity of bus services could also support modal change.</p> <p>The council will proactively engage with public, private and special educational needs school’s to promote sustainable modes to work towards obtaining STARS school travel accreditation and that where schools are already engaged to push for a minimum Silver level accreditation.</p> <p>When development proposals for new educational facilities or school are submitted to the council, there will be a planning condition requirement for the new development to achieve a minimum bronze standard (STARS).</p> <p>The council will facilitate a programme of behaviour, road safety and educational initiatives, such as Junior Travel Ambassadors, scooter/cycle and kerb craft will continue to be offered. The council will support existing schools</p>

	wishing to expand on-site cycle and scooter parking facilities for pupils and staff through their travel plans.
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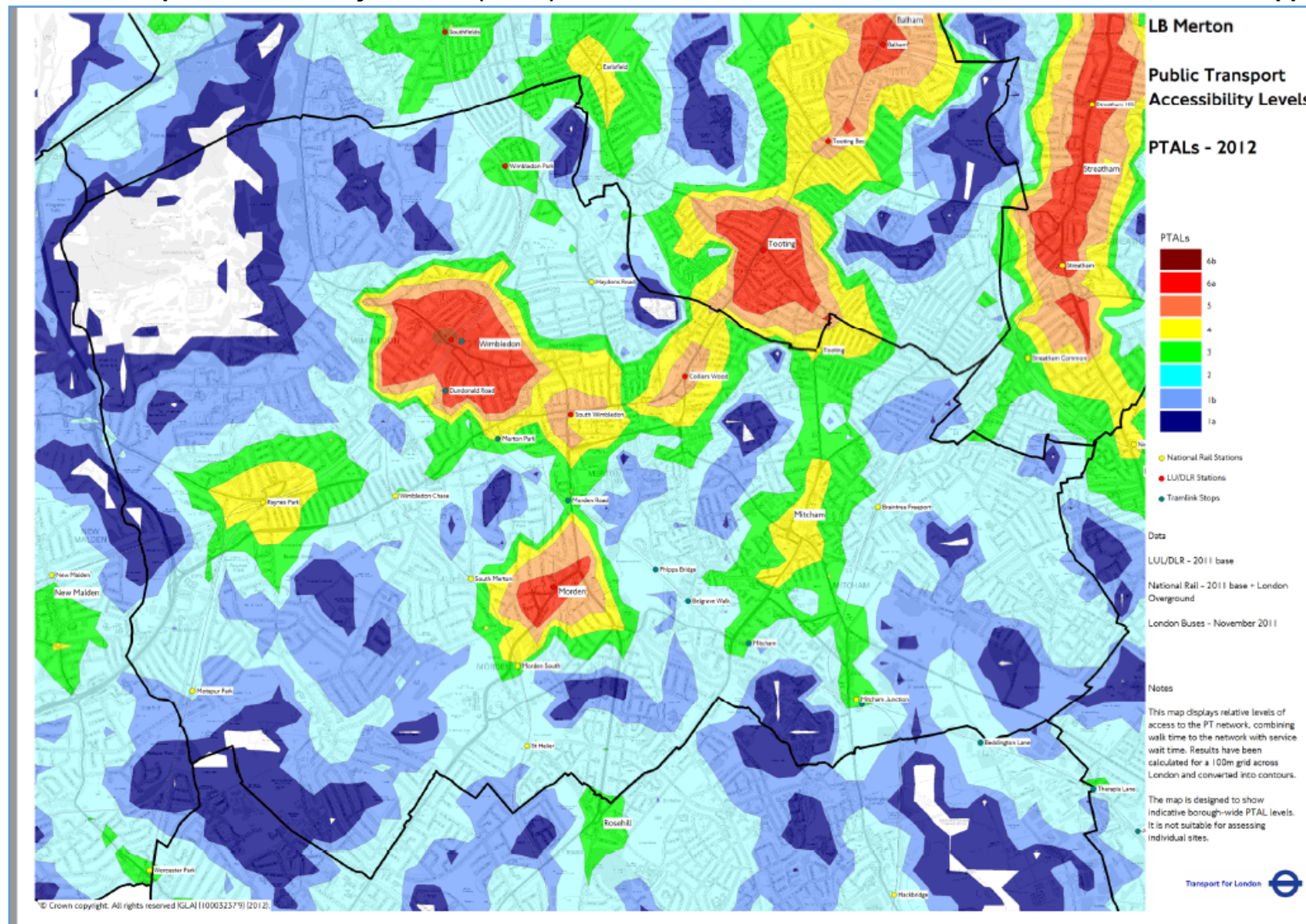
Walking

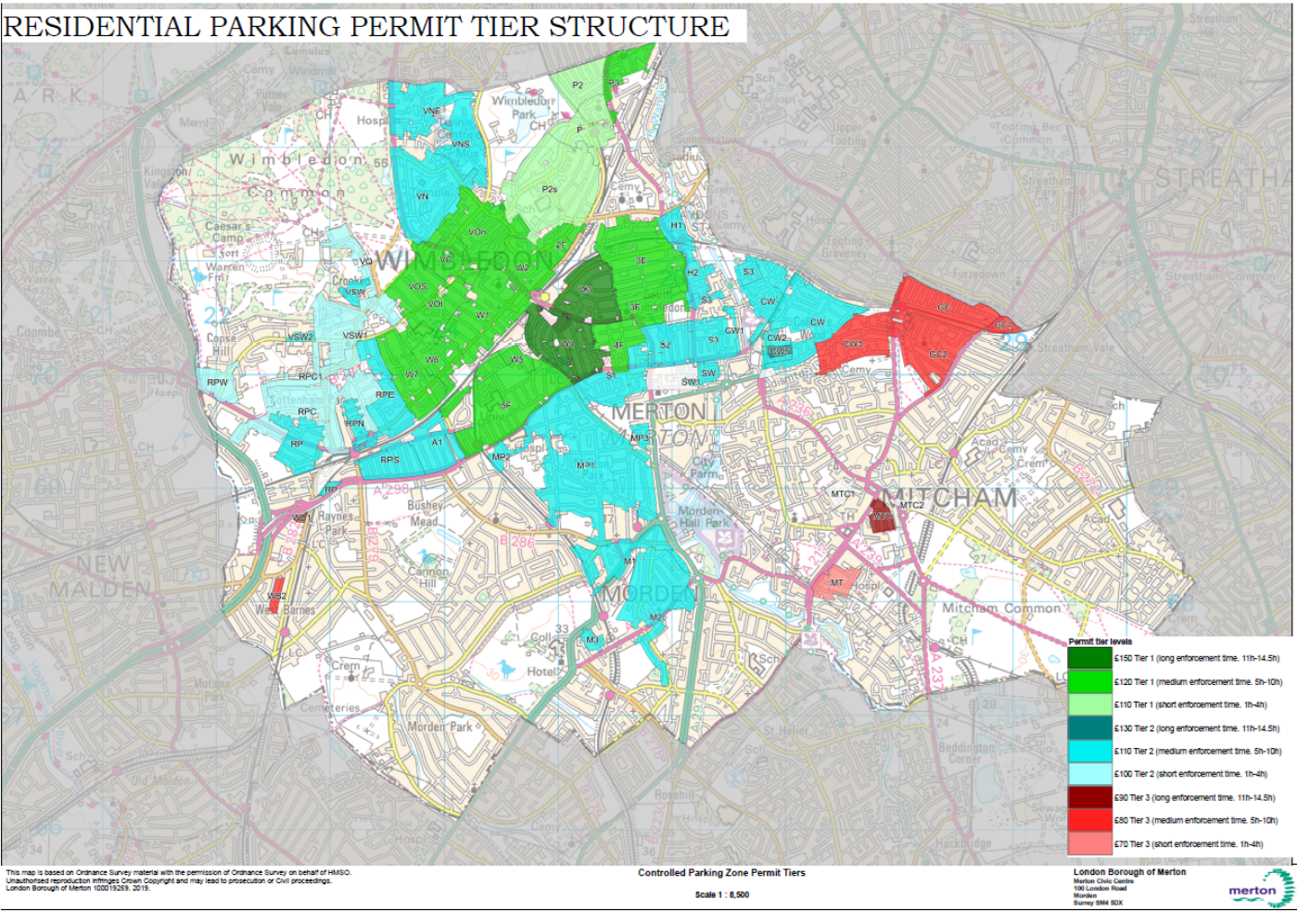
Walking in the borough	<p>Some respondents stated that walking in Merton, particularly in some areas was not pleasant. There were a variety of reasons such as volume of traffic, roadworks (limiting kerb space), poor signage, densely populated, poor street lighting and rubbish in the roads.</p> <p>Council response: The most direct and convenient walking routes between town centres and key attractors are often along difficult to cross, busy, traffic dominated connector streets and junctions. Focusing on some of these barriers and improving the wider journey experience should encourage more journeys by foot.</p> <p>Another disincentive to walking and cycling is the perceived dominance and speed of road traffic and lack of safe crossing places. Reducing traffic speed can reduce the severity of collisions and make streets more appealing places to walk and cycle especially for more vulnerable people who might otherwise be discouraged</p>
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London Borough of Merton 103010296, 2018.





Appendix 7a

Proposed Charges, On Street, Car Parks and residential Permits.

On Street Pay and Display.

On-street pay & display	Per Hour
Zone 1 255 bays in Wimbledon Town Centre	£4.50
Zone 2 Wimbledon Village, Wimbledon Park, South Wimbledon Rayne's Park. Colliers Wood,	£3.00
Zone 3 Mitcham, Morden and other areas not specified.	£1.50
Zone 1a Wimbledon Common	£1.50

Table of proposed charges. - Car Parks

Appendix 7b

CAR PARK (Inclusive of VAT).	Current hourly rate/flat fee	Proposed hourly rate/flat fee	Amendments Following consultation
WIMBLEDON			
Broadway	£1.00	£2.00	
Hartfield Road	£1.50	£2.00	
Queens Road	£1.00	£1.50	£2 flat fee between 6.00pm and 11pm
St Georges Road	£1.40	£1.50	£2 flat fee between 6.00pm and 11pm
MORDEN			
Kenley Road (flat fee)	£3.50	£7.00	
Morden Park (hourly)	£0.40	£0.60	
Morden Park (flat fee)	£5.00	£7.00	
Peel House Lower	£0.40	£0.60	
Peel House Upper (flat fee)	£5.00	£7.00	
Peel House Upper (hourly)	£0.50	£0.60	
York Close (flat fee)	£5.00	£7.00	
York Close (hourly)	£1.00	£1.20	
MITCHAM			
Elm Nursery	£0.50	£0.60	
Raleigh Gardens	£0.50	£0.60	
St Marks Road	£0.40	£0.60	
Sibthorpe Road	£0.70	£0.90	

Season Tickets

Mitcham Car Parks.

Mitcham Car Park	1 Month	+ 1 Month Diesel Surcharge £12.50	6 Months	6 month Diesel Surcharge £75	12 Months	12 Month Diesel Surcharge £150
Current charge	£25	N/A	£150	N/A	£300	N/A
Proposed local worker/ resident	£62.50	£75	£225	£300	£300	£450
Proposed commuter	£62.50	£75	£300	£375	£525	£675

Morden Car Parks

Morden	3 Months	3 Month Diesel Surcharge £37.50	6 Months	6 month Diesel Surcharge £75	12 Months	12 Month Diesel Surcharge £150
Current charge	£111	n/a	£223	n/a	£445	n/a
Proposed local worker/ resident	£350	£387.50	£525	£600	£700	£850
Proposed commuter	£393.75	£431.25	£700	£775	£1,225	£1,375

Queens Road Car Park Wimbledon

Queens Road - Wimbledon	3 Months	3 Month Diesel Surcharge £37.50	6 Months	6 month Diesel Surcharge £75	12 months	12 Month Diesel Surcharge £150
Current	£240	N/A	£480	N/A	N/A	N/A
Proposed local worker/ resident	£300	£337.50	£600	£675	N/A	N/A
Proposed commuter	£337.50	£375	£675	£750	N/A	N/A

RESIDENTIAL PARKING PERMITS

Zone duration	Tier 1 zones Wimbledon Town Centre	Tier 2 zones Part Colliers Wood/ South Wimbledon/ Rayne's Park/ Morden	Tier 3 zones Mitcham/ Part Colliers Wood	*100% electric vehicles All zones
Long (12 to 14.5 hrs)	£150	£130	£90	£20
Medium (6 to 10 hrs)	£120	£110	£80	£20
Short (1 to 4 hrs)	£110	£100	£70	£20

*The £20 fee is a reduction of £5 on the existing charge.

Note: A surcharge of £150 will continue to apply for all diesel vehicles.

Houses with multiple permits.

A second permit at the same property should incur a £50 surcharge, a third property a £100 surcharge, a 4th permit at £150.

Note: A surcharge of £150 will continue to apply for all diesel vehicles.

Visitor Voucher Charges

Tier	Half day	Full day
Tier 1 zones	£3.50	£5
Tier 2 zones	£3	£4
Tier 3 zones	£2	£3

Zone	Area	Tier 1	Time	Permit	New	Hours per	Annual
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			Group	price	Charge	weekday	visitor charge
W3	Wimbledon	Tier 1	Long	£65	£150	14.50	£400
W4	Wimbledon	Tier 1	Long	£65	£150	14.50	£400
2F	Wimbledon	Tier 1	Medium	£65	£120	10	£370
3E	Wimbledon	Tier 1	Medium	£65	£120	10	£370
3F	Wimbledon	Tier 1	Medium	£65	£120	10	£370
4F	Wimbledon	Tier 1	Medium	£65	£120	10	£370
5F	Wimbledon	Tier 1	Medium	£65	£120	10	£370
VC	Wimbledon Village	Tier 1	Medium	£65	£120	10	£370
VN*	Wimbledon	Tier 1	Medium	£65	£120	10	£370
Von	Wimbledon Village	Tier 1	Medium	£65	£120	10	£370
VOs	Wimbledon Village	Tier 1	Medium	£65	£120	10	£370
VOt	Wimbledon Village	Tier 1	Medium	£65	£120	10	£370
VSW*	Wimbledon	Tier 1	Medium	£65	£120	10	£370
VSW2*	Wimbledon	Tier 1	Medium	£65	£120	10	£370
W1	Wimbledon	Tier 1	Medium	£65	£120	10	£370
W2	Wimbledon	Tier 1	Medium	£65	£120	10	£370
W5	Wimbledon	Tier 1	Medium	£65	£120	10	£370
W6	Wimbledon	Tier 1	Medium	£65	£120	10	£370
W7	Wimbledon	Tier 1	Medium	£65	£120	10	£370
P3	Wimbledon Park	Tier 1	Medium	£65	£120	7	£370
VNe*	Wimbledon	Tier 1	Medium	£65	£120	6	£370
VNs*	Wimbledon	Tier 1	Medium	£65	£120	6	£370
		Tier 1					
P1	Wimbledon Park	Tier 1	Short	£65	£110	4	£360
P2	Wimbledon Park	Tier 1	Short	£65	£110	4	£360
P2S	Wimbledon Park	Tier 1	Short	£65	£110	4	£360
VSW1*	Wimbledon	Tier 1	Short	£65	£110	4	£360
VQ*	Wimbledon	Tier 1	Short	£65	£110	3	£350

Controlled Parking Zone charges Tier 1

Appendix 7d

* Moved to tier 2.

Controlled Parking Zone charges Tier 2

Appendix 7e

Zone	Area	Level	Time Group	Permit price	New Charge	Hours per weekday	Annual visitor charge
CW5	Colliers Wood	Tier 2	Long	£65	£130	12.5	£380
CW	Colliers Wood	Tier 2	Medium	£65	£110	10	£360
CW1	Colliers Wood	Tier 2	Medium	£65	£110	10	£360
CW2	Colliers Wood	Tier 2	Medium	£65	£110	10	£360
CW4	Colliers Wood	Tier 2	Medium	£65	£110	10	£360
M1	Morden	Tier 2	Medium	£65	£110	6	£360
M2	Morden	Tier 2	Medium	£65	£110	6	£360
M3	Morden	Tier 2	Medium	£65	£110	10	£360
MP2	Merton Park	Tier 2	Medium	£65	£110	10	£360
MP3	Merton Park	Tier 2	Medium	£65	£110	10	£360
S1	South Wimbledon	Tier 2	Medium	£65	£110	10	£360
S2	South Wimbledon	Tier 2	Medium	£65	£110	10	£360
S3	South Wimbledon	Tier 2	Medium	£65	£110	10	£360
SW	South Wimbledon	Tier 2	Medium	£65	£110	10	£360
MP1	Merton Park	Tier 2	Medium	£65	£110	6	£360
A1	Rayne's park	Tier 2	Medium	£65	£110	10	£360
RP	Rayne's Park	Tier 2	Medium	£65	£110	10	£360
RPE	Rayne's Park	Tier 2	Medium	£65	£110	10	£360
RPN	Rayne's Park	Tier 2	Medium	£65	£110	10	£360
RPS	Rayne's Park	Tier 2	Medium	£65	£110	10	£360
H1	Haydon Road SW19	Tier 2	Medium	£65	£110	10	£360
H2	Haydon Road SW20	Tier 2	Medium	£65	£110	10	£360
VN*	Wimbledon	Tier 2	Medium	£65	£110	10	£330
VSW2*	Wimbledon	Tier 2	Medium	£65	£110	10	£330
VSW*	Wimbledon	Tier 2	Medium	£65	£110	10	£330
VNe*	Wimbledon	Tier 2	Medium	£65	£110	6	£330
VNs*	Wimbledon	Tier 2	Medium	£65	£110	6	£330
RPW	Rayne's Park	Tier 2	Short	£65	£100	4	£320
RPC	Rayne's Park	Tier 2	Short	£65	£100	1	£320
RPC1	Rayne's Park	Tier 2	Short	£65	£100	1	£320
MT	Mitcham	Tier 2	Short	£65	£100	4	£320
VSW1*	Wimbledon	Tier 2	Short	£65	£100	4	£320
VQ*	Wimbledon	Tier 2	Short	£65	£100	3	£320

*Denotes was previously in Tier 1 now recommended as Tier 2.

Zone	Area	Level	Time Group	Permit price	New Charge	Hours per weekday	Annual visitor charge
MTC	Mitcham	Tier 3	Long	£65	£90	14.5	£340
CH	Cannon Hill	Tier 3	Long	£65	£90	12	£340
WB1	West Barnes	Tier 3	Long	£65	£90	12	£340
CW3	Colliers Wood	Tier 3	Medium	£65	£80	10	£330
GC	Mitcham	Tier 3	Medium	£65	£80	10	£330
GC1	Mitcham	Tier 3	Medium	£65	£80	10	£330
GC2	Mitcham	Tier 3	Medium	£65	£80	10	£330
WB2	West Barnes	Tier 3	Medium	£65	£80	6	£330
MT	Mitcham	Tier 3	Short	£65	£70	4	£320

Benefits of walking and cycling

Please see attached document.

Appendix 8

