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London Borough of Merton  
Overview and Scrutiny Commission

1 August 2019

Public Health, Air Quality and Sustainable Transport – A Strategic Approach to Parking Charges

I refer to the above report and the proposals therein which the Overview and Scrutiny Commission are considering on the 14<sup>th</sup> August. Our comments are as follows – numbered as per the paragraphs in the Cabinet report:

2.8 Adopting a parking charge policy that is aimed at reducing car ownership and usage across the borough is unreasonable and will prejudice many people who rely on private cars for many journeys. In the borough public transport is not readily available in all locations and at all times which is one reason why car ownership is so high in the borough. Even when public transport is nearby for a borough resident, it does not mean that it is available at the other end of any journey many of which will stretch far outside the borough. There are also many people who cannot easily use public transport such as the disabled or elderly.

No doubt the general health of the population would be improved if they took more exercise but that needs to be encouraged by education, not by dictating what transport modes are used.

3.1 The allegation that 9,000 Londoners die a premature death through poor air quality is an unsubstantiated allegation that is simply not true. It is a gross distortion of the scientific evidence. The ABD has recently published a document entitled "Air Quality and Vehicles – The Truth" which spells out facts. It can be obtained from this page of our web site: <https://www.abd.org.uk/air-quality-vehicles-truth/>. Even if all air pollution was removed from London (and that would mean removing all vehicles including buses, trains and airplanes, most business activity, most home heating, etc), lives would only be lengthened by a few days. That's ignoring the fact that a lot of the air pollution in Merton blows in from outside the borough.

3.8 Increasing the differentiation in permit charges between different types of vehicles will have miniscule impact on air pollution, on climate change, on people's choice of travel mode, or on anything else. There is no evidence that such policies have had a positive impact in any part of the UK despite many such claims being made.

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It is also unreasonable to target these policies solely on those who have to park on the street when those with off street parking are not affected at all, and vehicles travelling through the borough from elsewhere are not affected either. Bearing in mind that a high proportion of higher polluting vehicles are buses, HGVs and LGVs which may well come from outside the borough, you can see that the focus on cars subject to permit charges is misconceived and irrational.

This was covered in my previous letter to the Council in December 2016 when higher permit parking charges for diesel vehicles was being considered. I have attached that letter to this one to avoid repeating the same facts.

3.16 The claims noted about respiratory and cardiovascular disease, dementia and cognitive impairment in children are based on very limited scientific reports that are not substantiated by wider evidence. Such reports are often badly researched and based solely on epidemiological evidence that is subject to biases of various kinds that are often not excluded by incompetent researchers.

The claim that diabetes is rising due to sedentary lifestyles is grossly misleading. Diabetes is certainly related to excessive weight but this is primarily diet related, i.e. people are eating too much and the wrong kind of food. As anyone knows who has a weight problem, exercise can only contribute in a very minor way to weight reduction.

3.31 Cycling usage is not growing as pointed out. There is no evidence that encouraging modal shift has any effect on the level of cycling.

4.45 There is some justification for increasing parking charges to keep pace with inflation in administration and enforcement costs. However, the level of proposed increases in Merton is unreasonable as many residents have apparently told you. There is no justification for such increase and it will impose unreasonable hardship on many residents, particularly those who have no alternative transport facilities or capabilities. Some increase may be justifiable if permit parking charges have not increased for some years as alleged, but to double or almost double the charges for a facility upon which many residents rely is not fair nor reasonable.

5.37 I note the strong opposition to the proposals in the consultation findings which Councilors should not ignore. Public consultations are about obtaining the reasoned views of the electorate and should not be ignored simply because Councilors have their own pre-conceived prejudices on the issue. I also note the strong opposition to parking charges being related to ease of access to public transport.

8.1/8.10 The report correctly spells out the legal position regarding parking charges and "revenue raising". The latter is clearly illegal as determined by the *Cran v. Camden* case and subsequent ones. Unfortunately there is nothing in the report that spells out the current revenue from parking to the Council versus the projected revenue taking into account the revised permit parking and other charges. That information should be provided as evidence that the proposals are not based on a revenue raising consideration, in whole or in part, which I every much think is likely to be the case.

To summarise, the proposed changes in permit parking charges are based on a false premise that increasing charges will improve the health of the population, reduce air pollution and otherwise improve the environment. None of those claims are likely to appear in reality.

The proposed increases are simply unreasonable.

Yours sincerely

Roger Lawson  
Campaign Director

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