

## **Committee: Sustainable Communities Overview and Scrutiny Panel**

**Date: 25<sup>th</sup> February 2020**

Wards: All

**Subject: Review of Diesel Surcharge and proposals for emission based charges.**

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: for Sustainable Communities Overview and Scrutiny Panel**

1.1. Members to note the findings of the Diesel Levy and Emissions based charging review and comment on the emerging emissions based charging proposals to be considered by Cabinet in March 2020 and implementation in 2021.

1.2. Members to specifically comment on:

- (i) The proposed emission based charging model as set out in appendix A, to include:
  - a. All Permit charges, including Residents, Business, Traders, Teachers, and visitor permits.
  - b. All on and off street tariffs including Season Tickets, bay suspensions and other on street charges.
  - c. The draft Equality Assessment in Appendix 3

1.3. Members to note the review of current Parking machine infrastructure and the current use of scratch cards for visitor permits.

1.4. Members to comment on the proposed consultation process as set out in Section 14 below to engage with a wide range of stakeholders including, residents, resident associations, business, business associations and equality groups.

1.5. A further report following the consultation process will be referred back to Sustainable Communities Overview and Scrutiny Committee later in the year.

---

## 2. OVERVIEW – Terms of reference for Diesel Levy and Emission based charges review.

- 2.1. Cabinet on the 25<sup>th</sup> of March 2019 approved the terms of reference for a review of the diesel levy and emission based charging. The terms are set out in paragraphs 2.3 to 2.14 below.
- 2.2. This report sets out the findings of the review and proposals for a new emission based charging model for the future. A link to that report is given here. <https://democracy.merton.gov.uk/documents/s26899/Diesel%20levy%2026.02.19.pdf>
- 2.3. *Members may recall the Council took the bold decision to introduce the diesel levy surcharge in 2016. The emissions from diesel engines are known to be particularly harmful. At the time of approval, Members requested the effect of the levy be reviewed after 2 years of its operation.*
- 2.4. *Since its introduction in Merton a number of other London Boroughs have followed Merton's lead with the aim of reducing diesel car usage. Currently in Merton, the diesel levy is only charged on Permits, but consideration will be given to extending this to pay and display parking and season tickets.*
- 2.5. *A more recent practice is for councils to use emission based charging as a way of affecting driver behaviour and vehicle ownership. A revised [emissions based] charging approach will be considered as part of the review.*
- 2.6. *Merton parking service already 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; and the Mayor of London's Transport Strategy.*
- 2.7. *The outcome of the review will further help inform Members of these key strategic issues, which will affect parking policy for the future.*
- 2.8. *The review will explore the impact of the diesel levy and the extent to which it has contributed to a change in diesel car ownership.*
- 2.9. *The suggested terms of reference have been amended to include the revised reference set out in the Sustainable Communities Overview and Scrutiny Panel on 26th February 2019.*
- 2.10. *The review will seek to identify the type of behavioural change the levy has influenced, e.g. there might not be a fall in overall applications for permits, but over time there may be a trend for permits e.g. for less polluting vehicles, even though overall permit numbers remain broadly the same.*
- 2.11. *As an example, the list below sets out some of the considerations the review will look at and the wider issues of car ownership and trends.*
- 2.12. *Wider national trends:*
  - *National Car ownership trends in the short and medium term, such as the uptake of Electric Vehicles, walking and cycling.*

- *New car sales and type of vehicles now being purchased nationally and locally [if possible]. Also the life span of car ownership and effect of long-term trends.*
- *Percentage of cars in high-low polluting vehicles and trends.*
- *Other Borough charges and policies.*
- *Timescale for change.*
- *Charging options.*
- *Use of technology to deliver a new charging policy:*
- *The greater use of cashless parking systems and improved/modern P&D machines along with other technologies is known to be instrumental in implementing emission based charging and Members are asked to note section and the ongoing work in this regard.*

*Local data and review:*

- *The review team will consider diesel permit sales in Merton over the two years of operation.*
- *Compare Merton's trends with other boroughs and national trends in diesel vehicle ownership trends over the same period.*
- *Assessment of the impact on the introduction of the diesel levy*
- *Explore the case for change.*

2.13. *The review will also explore the case for a diesel levy on pay and display (on and off-street car parking) by looking at experience and examples elsewhere and how much a levy can be used to reduce diesel vehicle use.*

***Emission based charging***

2.14. *Whilst not an existing or proposed levy, Officers wish to explore the case for emission based charging for resident permits and parking charges generally. The review will explore the experience of other councils in implementing such schemes – the benefits and disadvantages of such a scheme and the impact this can have on driver behaviour and air quality.*

**Merton's existing policy drivers**

2.15. In the context of Merton's existing policies, 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 research undertaken, comparisons with other London Boroughs, to consider the council's rationale for amending its approach to diesel levy and emission charging, and finally to consider any proposed changes for consideration and agreement.

2.16. 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 public health and climate emergency. We are delivering an Air Quality Action Plan (AQAP) 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. Specifically, Action 32 contained within the AQAP states that there would be a review of the impact of our diesel levy\* and consider a review of parking and charges to help reduce combustion engine vehicle use and the consequent emission.  
\*Note: the sustainable communities and transport overview and scrutiny Panel to conduct pre decision scrutiny on the scope of any reviews on parking levies.

Please see link to Merton AQAP 2018-2023

<https://www.merton.gov.uk/assets/Documents/Merton%20AQAP%2020182023.pdf>

- 2.17. The council recognises the role that it has to play in developing and delivering a comprehensive framework to tackle air quality, climate change, the demand for parking, and congestion in the borough. It does not stand alone on these issues; most of the other London boroughs are seeking to implement new parking policies to tackle similar problems.
- 2.18. In July 2019, Merton declared a climate emergency and set an ambitious carbon reduction target which aims to make Merton carbon neutral by 2050 and the council by 2030. The council are in the process of forming a Climate Action Plan to deliver targets.
- 2.19. The evidence for declaring a climate emergency is overwhelming. In October 2018, the Intergovernmental Panel on Climate Change (IPCC) published a special report on the impacts of global warming of 1.5C. The IPCC found a 1.5C world would have significantly lower climate-related risks for natural and human systems than a 2C world, and that global CO2 emissions would need to reach net zero around 2050 in order to have no or limited overshoot beyond 1.5C of climate change. The Committee on Climate Change's Net Zero report stated that in order to become carbon neutral by 2050, a wholesale transformation of road transport would be required. All petrol and diesel vehicles need to be replaced with low carbon alternatives.
- 2.20. The key sources of greenhouse gas emissions in Merton are road transport and domestic and non-domestic heat and electricity. Merton has direct control over a very small proportion of the borough's emissions (around 2.5%) so it is essential that the Council uses every possible means to influence the behavior of residents, business and services to make sustainable transport choices and lead by example.
- 2.21. Transport is responsible for a quarter of Merton's emissions, mainly due to road transport. Consequently reducing the number of car journeys, replacing diesel and petrol cars with electric vehicles and expanding the network of electric vehicle charging points is essential. The Leader of the Council wrote to the Mayor of London in July 2019 to highlight Merton's concerns in respect of air quality and other environmental matters, asking for action, as shown in Appendix 5. Also attached is the Mayors response.
- 2.22. There are very few direct levers available to stimulate a change in driver behaviour, and the council believes that the rationale for reviewing emission charging is about giving people the right nudge and opportunity to make different choices.
- 2.23. 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. This reports set out the key strategic drivers that will affect emissions based charging for the future.
- 2.24. This report supports the rationale for seeking to adjust driver behaviour and to ensure that we can provide modern, efficient and environmentally sustainable transport choices for residents, visitors and businesses, now and in the future in Merton.
- 2.25. 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'.

- 2.26. In setting out its measures of success, the proposed emissions charging policy aims to deliver reduced/changed 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 both residents and businesses alike.
- 2.27. 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, in this case the strategic approach to air quality.
- 2.28. This report concentrates upon our review of the diesel surcharge and emissions based charging proposals.

### **3. THE CHALLENGE**

- 3.1. We know that over 9,000 Londoners die a premature death due to 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 to help tackle the problem. Councils up and down the country need to consider 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 (NO<sub>2</sub>). 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.

#### **Air Quality**

- 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 (NO<sub>2</sub>) and Particulate Matter (PM<sub>10</sub>). The air quality-monitoring network, run by Merton, has shown that the UK annual mean NO<sub>2</sub> objective (40µg/m<sup>3</sup>) continues to be breached at a number of locations across the borough including Colliers Wood, Mitcham, Morden, Tooting, Wimbledon and South Wimbledon. In some locations, the NO<sub>2</sub> 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. Reducing vehicle numbers (car usage) and moving towards less polluting vehicles has a direct and measurable benefit on reducing pollution.

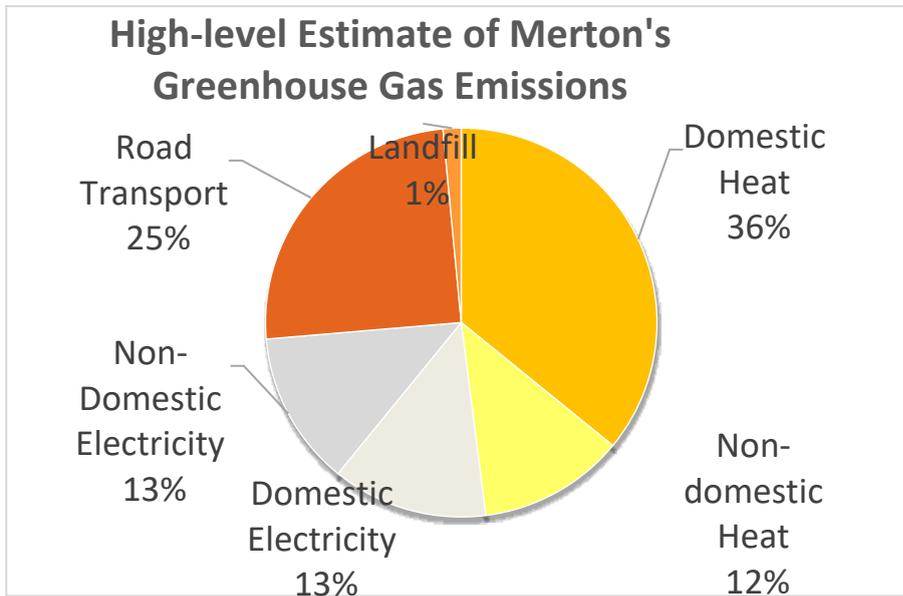


- 3.6. In Merton, an Air Quality Management Area (AQMA) has been declared for the whole borough with four locations identified as having high levels of pollution and human exposure. These are in the main centres of Mitcham, Morden, Raynes Park and Wimbledon.
- 3.7. Poor air quality in Merton comes from a number of sources, but our exceedances are almost entirely due to road transport. Road transport accounts for 66% of emissions of NO<sub>2</sub> 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 diesel, petrol and electric vehicles the proposed charges in part assist in the borough's response to climate change mitigation.

### Climate Change

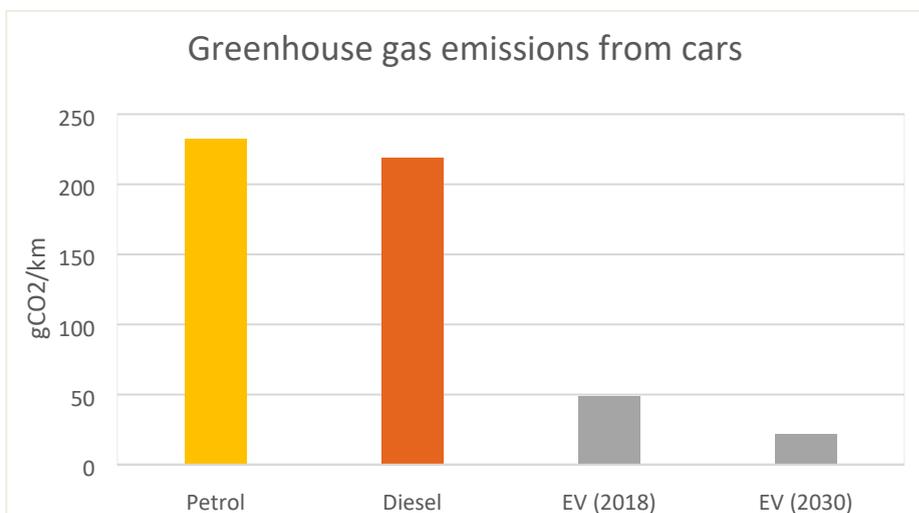
- 3.9. The latest evidence from the intergovernmental panel on climate change (IPCC) shows that deeper and faster cuts are needed to avoid irreversible damaging effects of climate change than previously thought. Committee on Climate Change's Net Zero report states that becoming carbon neutral by 2050 is technically feasible, but requires transformational change to the way we use energy, transport ourselves, and make decisions about what we eat, buy and throw away. This is reflected Mayor of London's updated London Environment Strategy and his 1.5-degree compatible climate action plan, which already commits London to being a zero-carbon city by 2050, consistent with national requirements. The Climate Targets set by Merton Council are consistent with becoming a carbon neutral borough over the same timeframe.

3.10. Depending on estimates, Merton produces between 1/2m and 1m tons CO2e per year. A quarter of greenhouse gas emissions are due to transport, mainly due to the 600M km road traffic each year. Petrol and diesel cars account for around 82% of road traffic, and as such make the greatest contribution to greenhouse gas emissions in the borough.



3.11. There are approximately 88,000 'vehicles' registered in Merton, with 68% of households owning at least one car or van. 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. This means taking around 2,500 cars off the road every year to 2050.

3.12. Where cars cannot be replaced with active travel, electric vehicles produce no air pollution emissions and no direct greenhouse gas emissions. Greenhouse emissions from the production of electricity still offer very substantial savings compared to fossil fuel vehicles. Currently, the proportion of electric vehicles makes up an extremely low proportion (less than 5%) of road transport.



Source: GLA's Zero Carbon Tool

- 3.13. In response to the Climate Emergency, the Council is developing a Climate Action Plan with residents, businesses and other key partners. Transport actions will be consistent with achieving the pace and scale needed to deliver a net zero borough by 2050, and will feed into transport policies across the Council. Many other Local Authorities are taking a similar approach.
- 3.14. There is a growing body of evidence, which helps us to understand the impact of transport on climate, and the actions that need to take place in order to achieve a carbon neutral transport system. There is a high level of consensus about the key transformations that need to happen in order to achieve a net zero transport system. Solutions that deliver greenhouse gas savings will also help with 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. These include:
- A substantial reduction in road transport to be replaced with public transport and active travel.
  - Transport infrastructure that encouraged greater active and sustainable travel.
  - No new sale of petrol and diesel vehicles from 2040.
  - All cars and vans fully electric by 2035.
  - Sufficient electric charge points to meet increase in demand for electric vehicles.
- 3.15. ***There are many actions that can be adopted by Councils to deliver the necessary transformation, and a range of expert bodies are providing advice and case studies to help accelerate the move towards sustainable travel. One example*** being considered by the Climate Emergency Working Group set up to steer the Climate Action Plan ***is the paper drawn up by*** London Living Streets (downloadable at <https://londonlivingstreets.files.wordpress.com/2019/11/climate-emergency-policies-to-decarbonise-road-transport-nov.-2019.pdf>). It recognizes the role of parking charges and the reduction in parking availability to encourage residents and businesses to consider options other than fossil fuel vehicles.

### **3.16. PUBLIC HEALTH**

- 3.16.1. 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
- 3.16.2. 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 previous reports to Cabinet, this strategy is being refreshed with a final version of the refreshed strategy and was approved by the Health and Wellbeing Board at its meeting on 25 June 2019.
- 3.16.3. 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.
- 3.16.4. 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.

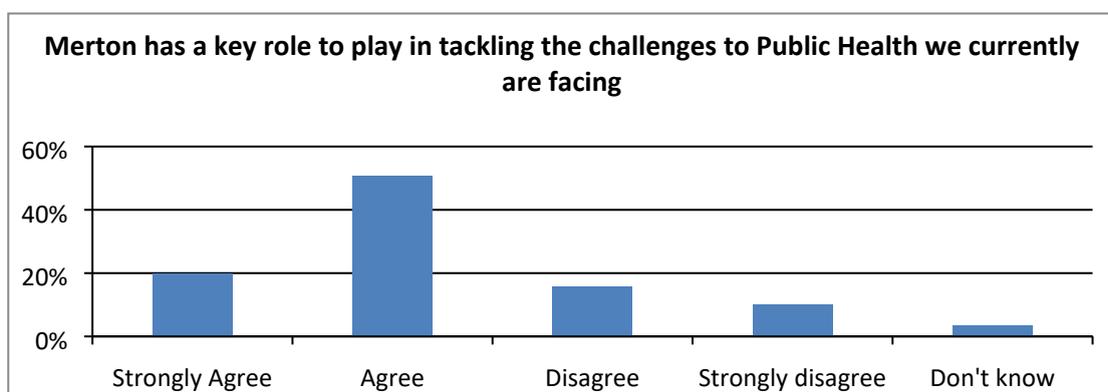
3.16.5. The essence of the public health argument for the proposed changes to diesel surcharge and emission based charges are that they will encourage less car use, which in turn reduces two major risks to health: air pollution and sedentary behaviour.

3.16.6. Air pollution is recognised as a major contributor to poor health with more than 9000 premature deaths attributed to poor air quality in London Air pollution is associated with a number of adverse health impacts: it is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality are often less affluent.

3.16.7. The benefits to health of these reductions in health risks are 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.

3.16.8. The graph below is the response from the recent consultation (from May – June 2019 in relation to Parking Charges) specifically asking if Merton has a key role to play in tackling the challenges to public health we are currently facing.



3.16.9. It is clear from the response shown above that over 70% of respondents agree/strongly agree that the Council has a key role to play in tackling the challenges to public health.

- 3.16.10. 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.

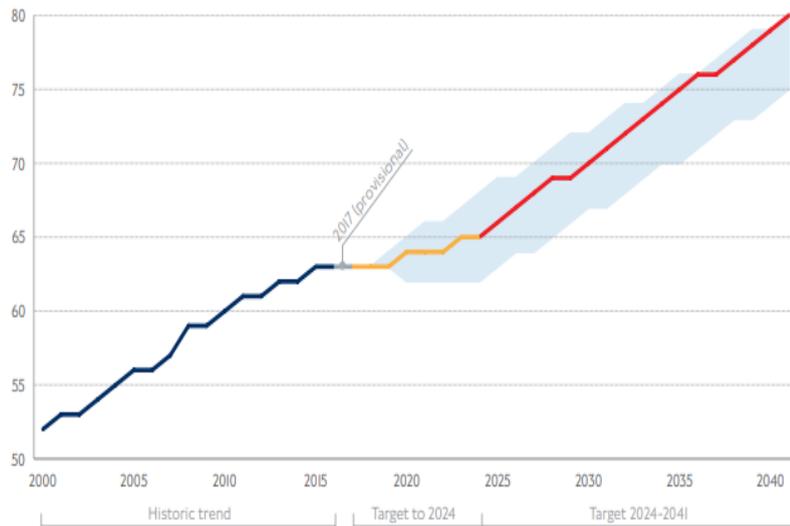
<https://fingertips.phe.org.uk/search/air%20pollution#page/0/gid/1/pat/6/par/E12000007/ati/101/are/E09000002/iid/30101/age/230/sex/4>

- 3.17. London Living Streets recognizes the role of parking charges and the reduction in parking availability to encourage residents and businesses to consider options other than fossil fuel vehicles.

<https://londonlivingstreets.files.wordpress.com/2019/11/climate-emergency-policies-to-decarbonise-road-transport-nov.-2019.pdf>

### **3.18. SUSTAINABLE ACTIVE TRAVEL**

- 3.18.1. TfL are investing record amounts in walking and cycling, supporting efficient and healthy ways to get around the city. Nearly half of car trips by Londoners could be cycled in around 10 minutes, and more than a third could be walked in under 25 minutes. The aim is to give people to have the opportunity to do two 10-minute periods of brisk walking or cycling a day, which is enough to avoid the greatest health risks associated with inactivity. We want to enable more than one million additional walking trips a day by 2024.
- 3.18.2. TfL are investing £2.3bn on Healthy Streets. This will fund transformative projects to enable more walking and cycling across London. This includes investment in Liveable Neighbourhoods in local areas and the Safer Junctions programme to reduce road danger
- 3.18.3. Our new Healthy Streets Activation programme brings together the most effective and proven measures, such as projects at schools, to support people using new infrastructure and help Londoners from all communities enjoy walking and cycling.
- 3.18.4. 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.
- 3.18.5. 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.
- 3.18.6. The figure below shows the expected path to achieving the Mayor's Transport aim that 80% of trips will be made by foot, by cycle or using public transport by 2041.



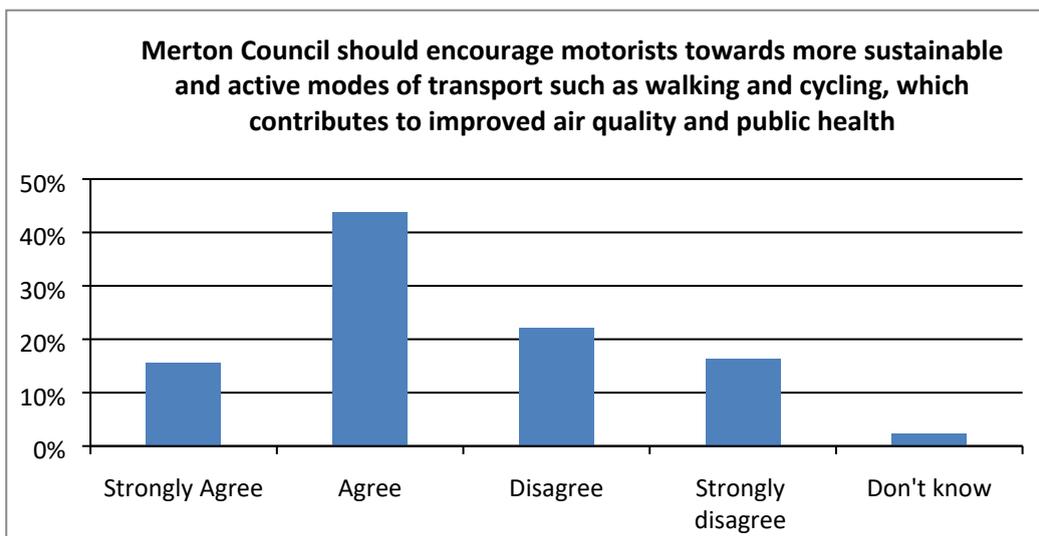
The shaded region shows the range of outcomes and risk to achieving the target.

- 3.18.7. The third Local Implementation Plan (LIP) sets out Merton’s Council’s three-year delivery programme for the period 2019/20 to 2020/22.
- 3.18.8. Over the last 6 years, Merton Council has spent £19.2m on 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.
- 3.18.9. 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. 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.

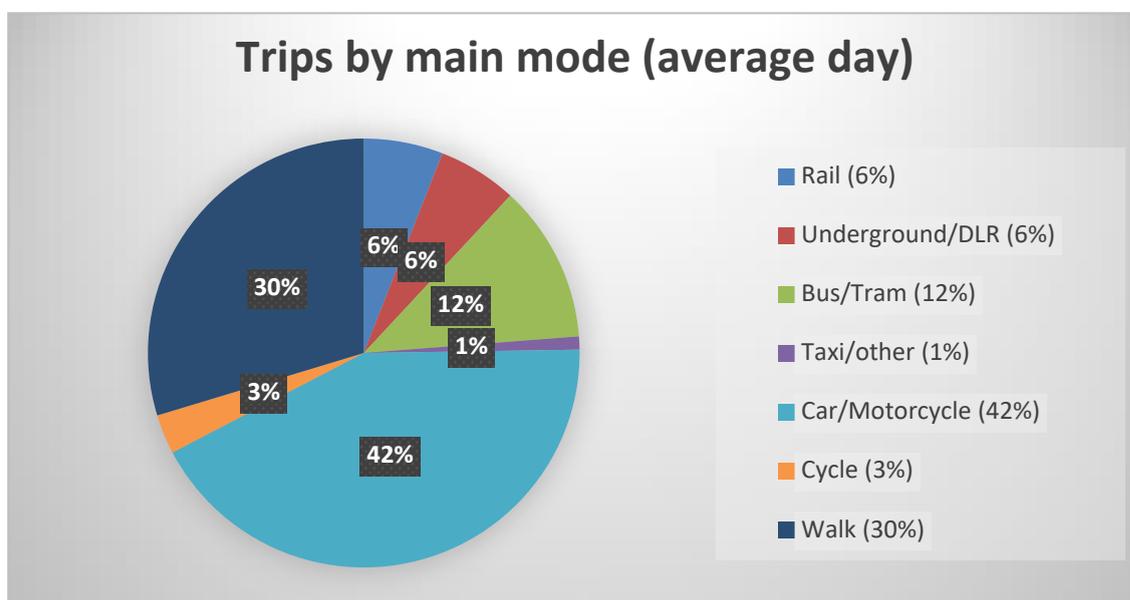
- 3.18.10. In the recent consultation exercise (from May – June 2019 in relation to Parking Charges) residents were asked whether:



3.18.11. 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%).

3.18.12. 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).

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



3.18.14. 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.

- 3.18.15. Walks of up to 25 minutes could replace over one third of all car trips made by London residents.
- 3.18.16. 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.
- 3.18.17. 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.
- 3.18.18. 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 many streets across Merton.
- 3.18.19. The council is also developing its infrastructure for electric vehicles. Merton's ambition by 2021/22 is to facilitate 143 electric charge vehicle points across the borough, including fast, rapid and residential charge points. There are currently 94 in operation.
- 3.18.20. 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.
- 3.18.21. 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).
- 3.18.22. The Northern London Underground line also runs through the borough and terminates at Morden, (including a nighttime 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).
- 3.18.23. Further examples of where increased charges has stimulated direct behavioural change include:
- 3.18.24. 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.
- 3.18.25. 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).
- 3.18.26. 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:

- 3.18.27. Increased parking fees will lead to the desire to reduce private car travel, prompting people to choose alternative forms of travel
- 3.18.28. If travelers expect higher parking fees they will change their route, or use other means of transport to reach their destinations.
- 3.18.29. 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:
- 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.

#### **4. Healthy Streets: Common aims and working in partnership with TfL**

- 4.1. The Healthy Streets Approach and the 10 Indicators of a Healthy Street were first included in Transport for London (TfL) policy in the first Health Action Plan in 2014 and TfL has been working on how to deliver this approach in London. The Mayor expects the Healthy Streets Approach to be delivered by all parts of the GLA family, as set out in A City for All Londoners and Healthy Streets for London.
- 4.2. These indicators are essential for making streets work well for all people. Delivering these Indicators will ensure everyone can access and enjoy using the Capital’s streets and lead active, healthy lives. Each Indicator is backed by scientific evidence that it improves health, reduces inequalities and encourages people to walk and cycle.
- 4.3. The ten indicators are as follows:
- People chose to walk, cycle and use public transport
  - Pedestrians from all walks of life
  - Clean Air
  - People feel safe
  - Not too noisy
  - Easy to cross
  - Places to stop and rest
  - Shade & shelter
  - People feel relaxed
  - Things to see and do
- 4.4. The new London Boroughs Healthy Streets Scorecard was launched in November 2019.
- 4.5. The scorecard is an entire report – but the overall rankings are eight metrics, four “inputs” that are things boroughs can do rapidly and largely cheaply to make streets healthier, and four “outputs” that reflect the long-term progress boroughs have made on their streets.

- 4.6. Inputs include things like the level of modal filtering a borough has done, the km of cycle tracks built in the borough and the coverage of the borough in controlled parking zones (CPZs). Outputs cover things like risk to those walking or cycling suffering a serious collision, the “mode share” of walking, cycling and public transport vs car use, and the proportion of residents regularly walking and cycling.
- 4.7. The graphic below from the TfL plans from the report Transport for London Business Plan 2019/20 to 2023/24 clearly sets out their priorities for the future.

### Healthy Streets and healthy people

Investment will focus on improving the experience of being in the places where people live, work, go to school, spend time and travel. Reducing traffic dominance

and prioritising walking, cycling and public transport use will help Londoners live active, healthy lives and help create a city that works well for all of its residents.

**More** cycling and walking

**Transform** junctions for pedestrians and cyclists

**Vision Zero** target for road safety

Work towards nobody killed on or by a bus by **2030**

Purchase only **zero-emission** single-deck buses from 2020

Develop the infrastructure for **electric taxis**

**World's first** Ultra Low Emission Zone launches

**More** integrated deliveries

### A good public transport experience

The right investment will ensure that public transport becomes an increasingly attractive alternative to using a car. Proper planning for the whole journey will help integrate public transport and

street-level investment. Making sure the right services are available where people need them, reducing overcrowding and keeping fares affordable will help to reduce car dependency.

Keep all TfL fares **frozen** until 2020

**More** bus services for outer London

**100%** step-free access on the Elizabeth line

**More** automatic refunds for maximum fares

**4** London Underground lines to get extra capacity

**54** new state-of-the-art trains for London Overground

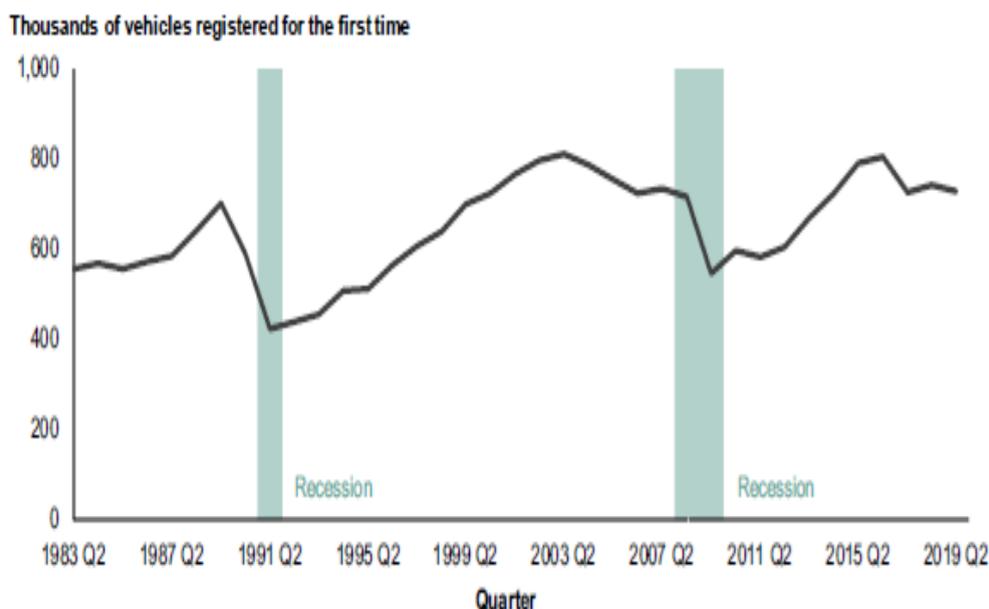
**Improve** taxi rank accessibility

4.8. TfL investment programme will make it easier and more attractive to travel by sustainable methods of transport. TfL expect the percentage of trips made on foot, bicycle or public transport to increase from 63 per cent currently to around 65 per cent by 2024, although this could be slightly higher or lower depending on the factors described above. This is up from 52 per cent in 2000 and would be the highest this has been in London since TfL was formed.

## 5. REVIEW OF FINDINGS

5.1. The review considered the wider issues of car ownership and trends both nationally and locally, including types of car by emission type. This report also set out examples of other boroughs charging policies. The review also explored the impact of the diesel levy and the extent to which it has contributed to a change in diesel ownership, specifically in relation to parking permits in Merton.

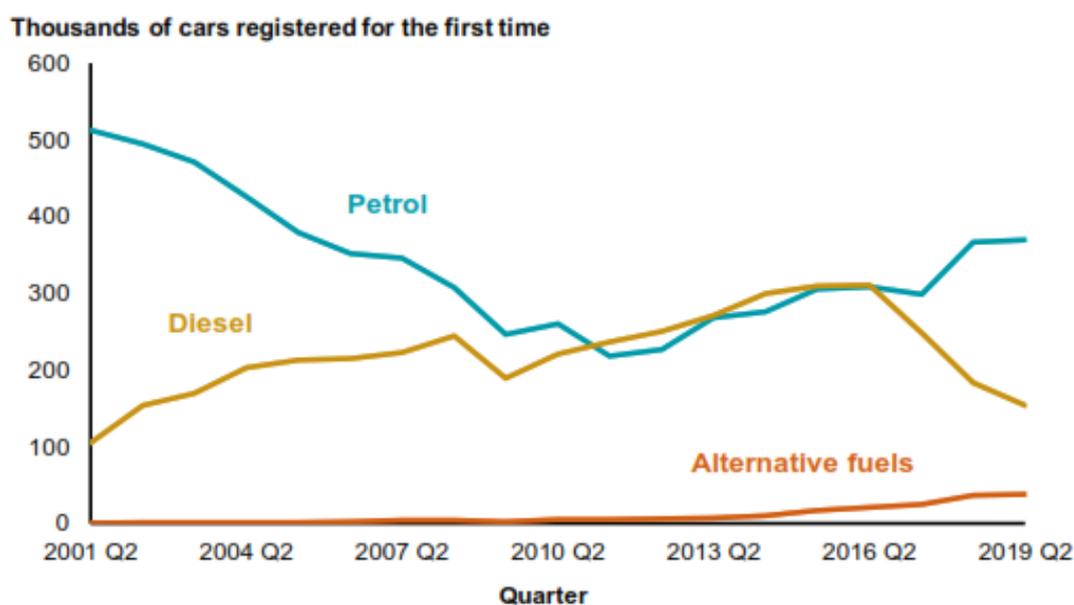
5.2. At the end of June 2019, there were 38.7 million licensed vehicles in Great Britain, an increase of 1.3% compared to the end of June 2018. The total number of licensed vehicles has increased in all but one year (1992), since the end of the Second World War. Cars make up the majority of new registrations, accounting for 77.2% of all new registrations in 2019 Q2.



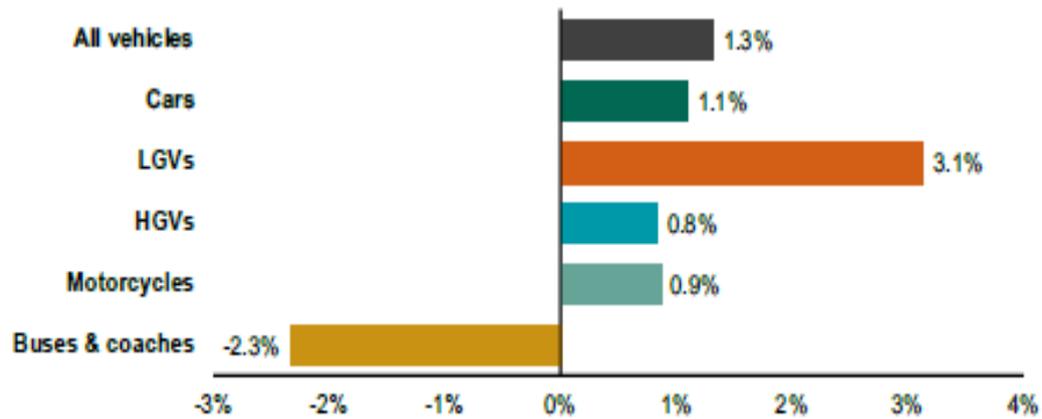
5.3. Over the last 10 years car parking and permit prices have been frozen in Merton and the number of 'cars' registered in Merton rose from 69,500 to 71,900. Whilst car ownership in the borough has started to decline over the last 12 months' overall car ownership has risen by approximately 3.3% over the last 10 years. The total number of vehicles registered in Merton from Driving Vehicles Licensing Agency (DVLA) records is 88,000. In January 2020 a new charging structure including on and off street charges and Residential Permits, was introduced with the aim to nudge motorist away from car ownership and use. Also in 2019 the Diesel Levy surcharge also increased from £110 to £150. The effect of the new charges will continue to be under review.

## 5.4. New car sales in Great Britain

- 5.4.1. The graph below illustrates the number of vehicles being registered for the first time in Great Britain; source Driving Vehicles Licensing Agency (DVLA).
- 5.4.2. In 2019, the registration of new diesel cars continued to fall rapidly. Diesel cars accounted for 49% of all new car registrations in the second quarter of 2016, which has dropped to 27% in the second quarter of 2019.
- 5.4.3. In 1997, the Kyoto protocol climate change agreement legally obligated major nations to reduce their CO2 emissions. Because diesels produce less CO2 than petrol vehicles, they were seen as a fast solution to this demand. Accordingly, the government of the time introduced a new Vehicle Excise Duty (VED) tax policy, which cut taxes on diesels. Sales of new diesels soared, with diesel market share in the UK rising from less than 10% in 1995 to nearly 50% in 2016.
- 5.4.4. Although diesels produce 15% less CO2 than petrol cars, they emit four times more nitrogen dioxide (NO2) as well 22 times more particulate matter or PM – tiny particles that penetrate the brain, lungs and heart.

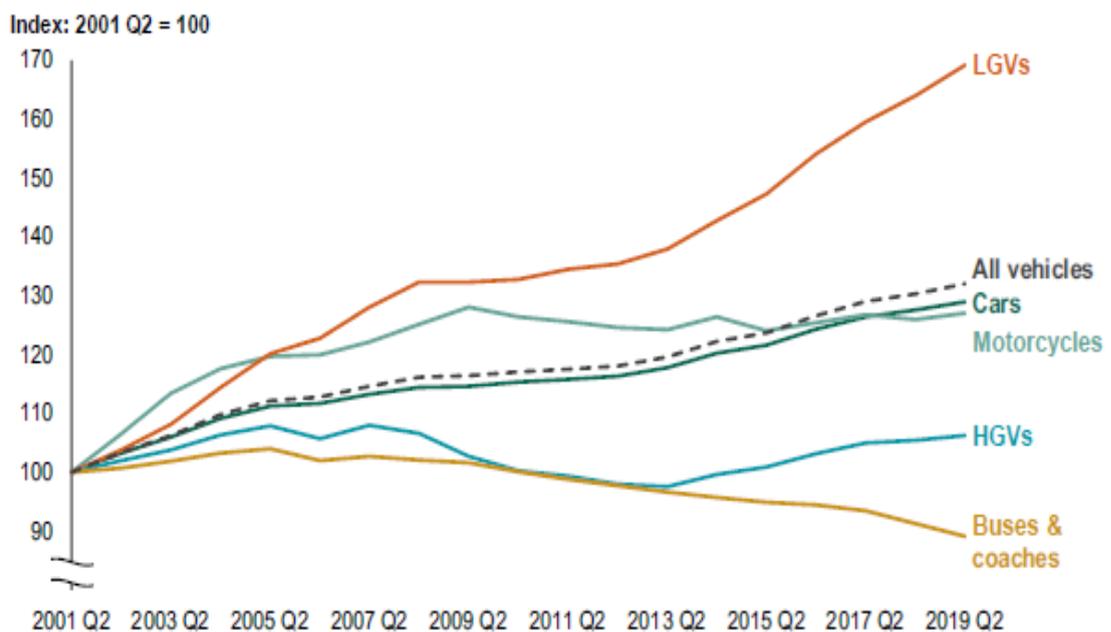


- 5.4.5. Cars registered for the first time declined by 4.1% in 2019 Q2 compared to 2018 Q2, which may have reference to the uncertainty of Brexit and making a commitment to purchase a new car. Both light and heavy goods vehicles saw a large increase of 8.2% and 36.7% respectively. The increase for heavy goods vehicles (HGVs) was likely affected by the introduction of mandatory smart tachographs from 15 June onwards.
- 5.4.6. The image below shows the annual change in licensed vehicles by body type, Great Britain, end June 2019.



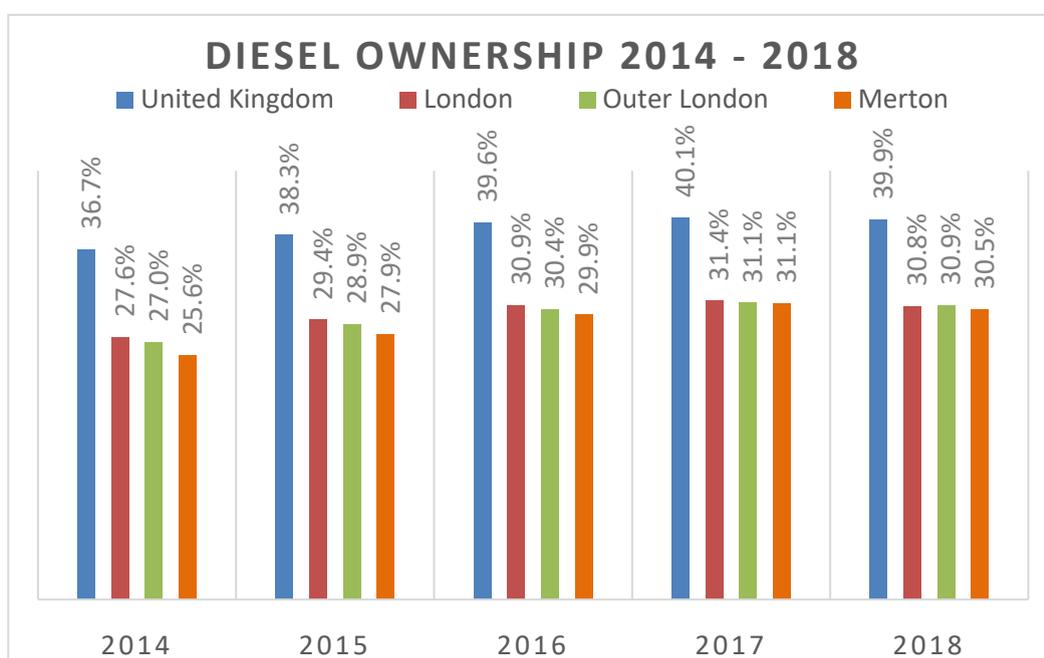
### 5.5. Car ownership by type in Great Britain

- 5.5.1. Cars make up the majority of licensed vehicles. There were 31.8 million cars (82.3%), 4.1 million LGVs (10.6%), 0.51 million HGVs (1.3%), 1.3 million motorcycles (3.4%), 0.15 million buses & coaches (0.4%), and 0.76 million other vehicles (2.0%) licensed at the end of June 2019.
- 5.5.2. All body types apart from buses & coaches saw an increase in overall registered vehicles since the end of June 2018. The largest percentage increase was for LGVs at 3.1%, followed by cars at 1.1%, and motorcycles at 0.9% and HGVs at 0.8%. Buses & coaches fell by 2.3%, which reflects the decline in new registrations.
- 5.5.3. The image below shows the index of licensed vehicles at the end of the quarter by body type, Great Britain, 2001 Q2 to 2019 Q2.



### 5.6. Diesel car ownership in Merton

- 5.6.1. National Trends show no significant change of diesel car ownership on street within the last two years; however, diesel ownership in Merton is 9.4% below the national average, but has only seen a 0.6% decrease from 2017 to 2018 in diesel ownership.
- 5.6.2. In 2018 at 30.5%, Merton is slightly below the London and outer London averages for diesel ownership of 30.8% and 30.9% respectively.
- 5.6.3. Despite purchasing of new diesel cars in the United Kingdom reducing over recent years, the ownership of diesel cars has not significantly reduced as can be seen in the table below. One reason is because the life span of a diesel vehicle is on average 12 years and the public continue to use diesel vehicles, as it is often considered the most financially advantageous option when buying or changing a car. From 2014 to 2017, the percentage of diesel car ownership increased in Merton but has seen a very small decline from 2017 to 2018. There is no obvious significant decline in diesel car ownership in Merton.

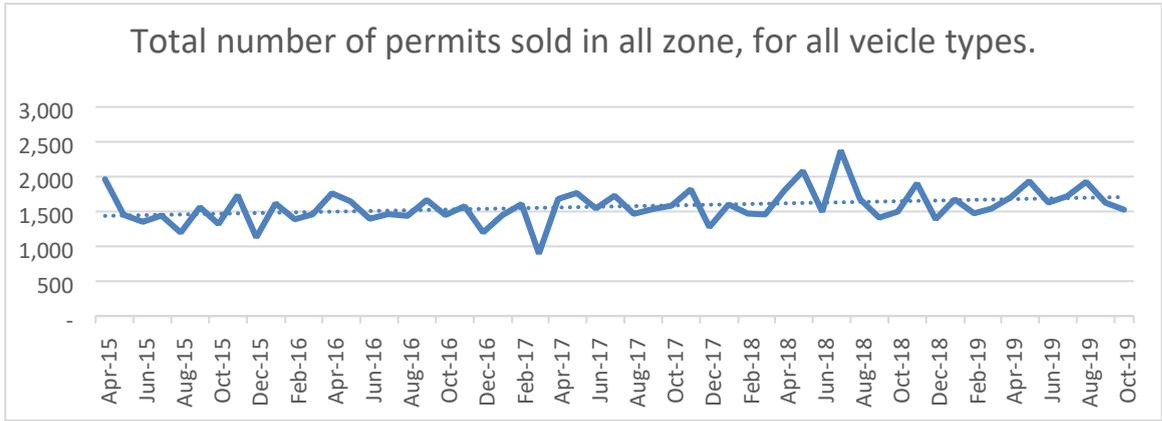


### 5.7. Merton Diesel Levy

- 5.7.1. In April 2017, Merton implemented a diesel levy to encourage drivers/owners to move away from diesel vehicles. The diesel levy was implemented for resident, teacher, and business permits. It was phased in over a 3 year period and the charges were £90 - 2017/18, £115 in 2018/19 and £150 in 2019/20 respectively.

### Total Permit sales

- 5.7.2. The table below shows total residential permit sales for 2015/16 to date. The graph shows an overall increase in Permit sales. A key factor is the increase in the number of CPZ over the same period. Other factors such as housing development and no sign of a decline in car ownership has also contributed to this rise. Indeed, another CPZ is due to be implemented in February 2020 with approx. 1,200 properties entitled to purchase permits. Some of which may buy multiple permits if more than one car is owned/registered at the property.

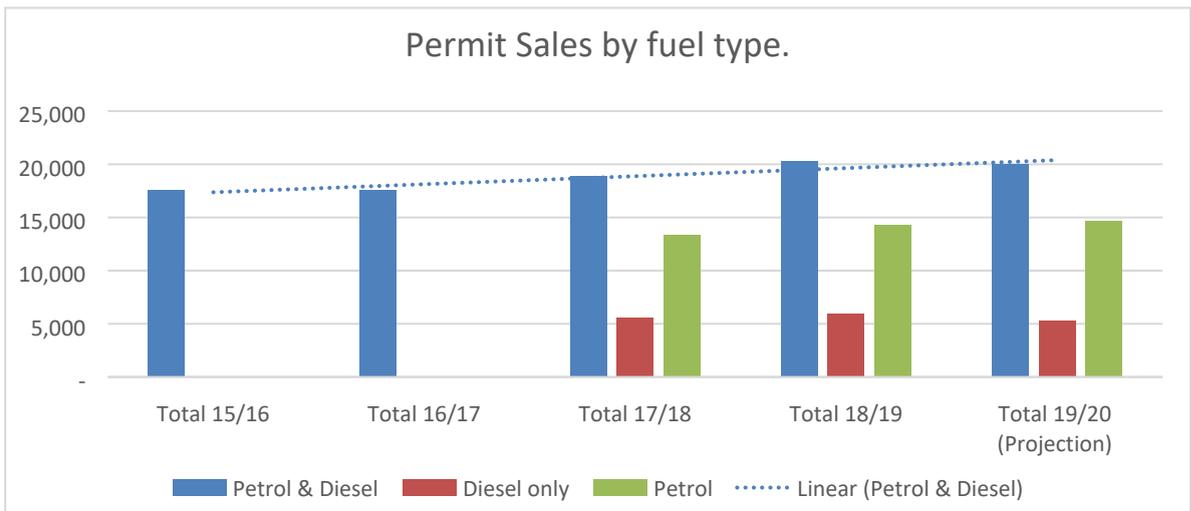


\*The data for total permits sales in 2017 is subject to mathematical adjustment based on historic trends and known future sales. This is due to reporting issues and the introduction in the diesel level in early 2017/18.

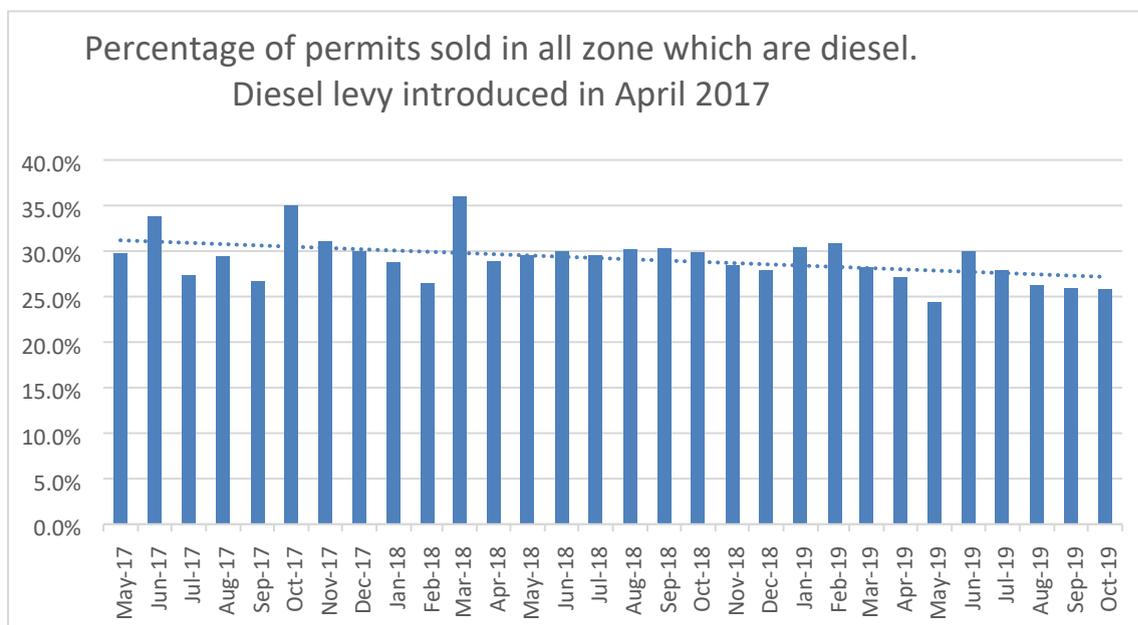
5.7.3. The diesel level was introduced in April 2017. Because of the implementation of a number of new Controlled Parking Zones (CPZ), total number of permits and in deed diesel permits have risen. However the projected number of permits to be sold for 2019/20 is slightly down on 2018/19 @ 20,003, 14,667 Petrol and 5,337 diesel. This figure however may increase if the new CPZ planning for February is implemented.

Date	Petrol & Diesel	Diesel only	Petrol	% Diesel	of which are new zones
Total 15/16	17,613	-	-		334
Total 16/17	17,541	-	-		565
Total 17/18	18,932	5,578	13,345	29.46%	Limited Data
Total 18/19	20,322	5,990	14,332	29.48%	1213
Total 19/20 (Projection)	20,003	5,337	14,667	26.68%	

The data in the far right hand column shown the number of permits sold in CPZs, which were implemented in each year.



5.7.4. The table below shows the percentage of permits sold in all zones, which are diesel. There is a downward trend of diesel permit sales as a percentage and in more recent months of 2019/20 since the diesel surcharge was raised to £150 permit sales on a month-by-month basis are less than the same period in 2018/19. Another contributing factor could also be the drop off in national new diesel car sales (shown in 5.7.3) that are now filtering into car ownership within Merton CPZs and residents considering car choice purchases based on diesel levy surcharge.



5.7.5. There has been a reduction in the percentage of diesel permits sold against petrol. The data below shows there has been a greater decrease in diesel sales as a percentage during the period April 2019 to September 2019 than in the same period in 2017/18. This is believed to be a combination of the £150 diesel levy change since April 2019, national car sales trends, (reduction in diesel) filtering through, and more general awareness of problems caused to the environment by vehicles through the media.

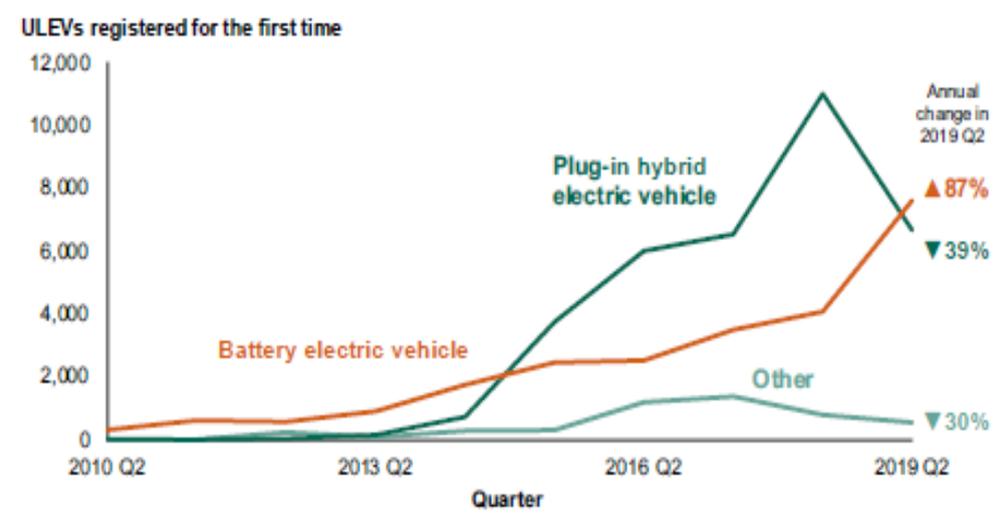
Date	Petrol & Diesel	Diesel only	Petrol	Diesel %
Apr-18	1801	519	1282	28.8%
May-18	2081	614	1467	29.5%
Jun-18	1496	449	1047	30.0%
Jul-18	2376	702	1674	29.5%
Aug-18	1678	506	1172	30.2%
Sep-18	1411	427	984	30.3%
<b>TOTALS APRIL-SEP 2018</b>	<b>10843</b>	<b>3217</b>	<b>7626</b>	<b>29.7%</b>
Apr-19	1,702	461	1,241	27.1%
May-19	1,936	471	1,465	24.3%
Jun-19	1,628	487	1,141	29.9%
Jul-19	1,718	479	1,239	27.9%
Aug-19	1,926	505	1,421	26.2%
Sep-19	1,626	421	1,205	25.9%
<b>TOTALS APRIL-SEP 2019</b>	<b>10,536</b>	<b>2,824</b>	<b>7,712</b>	<b>26.8%</b>

- 5.7.6. Diesel vehicle ownership as a percentage has reduced in nearly all permit zones since the introduction of the diesel levy in April 2017. There were 50 controlled parking zones when the diesel levy was implemented in April 2017. After two years of the diesel levy being in place there was a reduction in the number of diesel vehicles in 46 out of the 50 original controlled parking zones.
- 5.7.7. To understand further residents/customers reasons for changing their vehicles from Diesel to Petrol or Petrol to Diesel we wrote to a number to establish the reason for their change. Customers were happy to reply and gave a range of reasons such as cost, environmental concerns and change in work arrangements. A sample of responses are shown in Appendix 4.

**5.8. Electric vehicles**

- 5.8.1. Electric vehicles are a more sustainable form of transport than diesel or petrol. Due to increasing options the purchase of electric vehicles are growing in popularity, as both cost of purchase and maintenance charges are reducing. However, the speed of take up of Ultra Low Emission Vehicles is substantially slower than needed to achieve the rapid reduction of fossil fuel vehicles needed to achieve our aspirations on climate and air quality.
- 5.8.2. New fully electric sales continue to increase generally but Hybrid numbers in the UK declined in the last quarter. In 2019 Q2, 14,811 ULEVs were registered for the first time in the United Kingdom, and accounted for 2.0% of all new vehicle registrations. From a low base it is predicted that electric vehicle sales will grow rapidly in the coming years.

**Figure 4: ULEVs registered for the first time by fuel type, UK, 2010 Q2 to 2019 Q2**



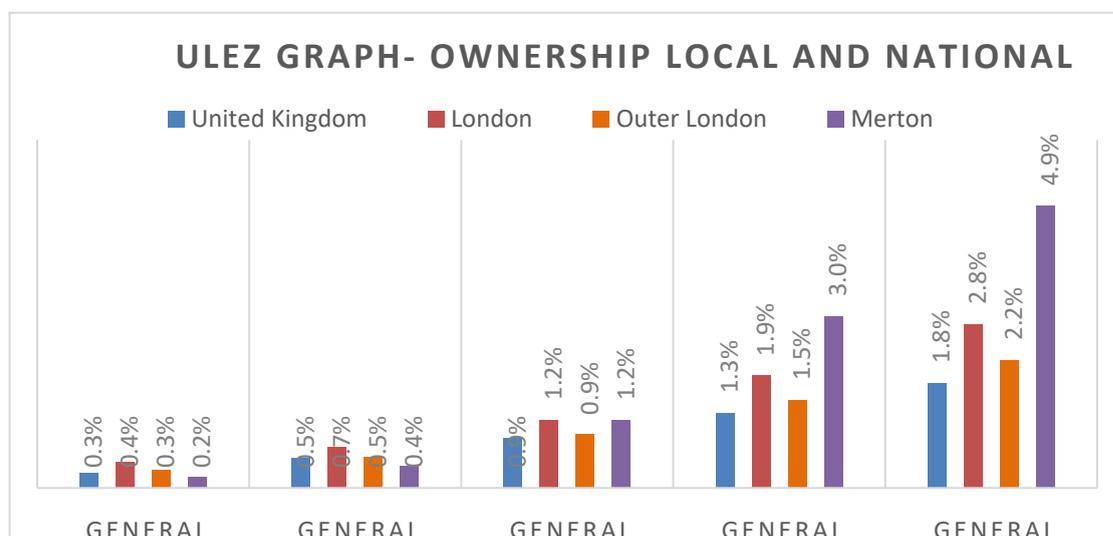
**5.9. Electric cars in Merton’s CPZs.**

- 5.9.1. Merton in 2018 issued 51 fully electric resident permits compared to 32 in 2017. Figures for November 2019 show a further increase in electric car ownership with 75 permits active. The price of an electric vehicle permit is £20 which continues to show Merton’s commitment to more sustainable forms of transport.

Electric permits issued:	Total
2017/18	32
2018/19	51
As at 3 <sup>rd</sup> December 2019	75

**5.10. Ultra-low emissions vehicles (Electric and Hybrid vehicles)**

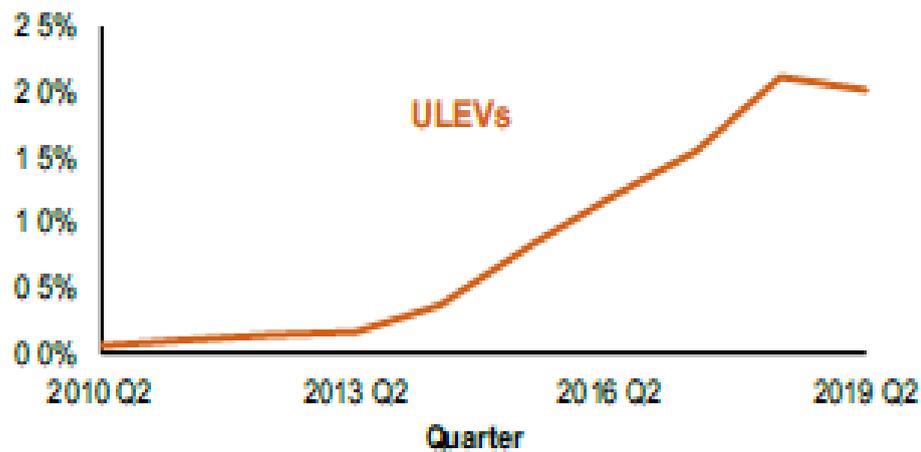
- 5.10.1. Ultra-low emission vehicles (ULEVs) are vehicles that emit less than 75g of carbon dioxide (CO2) from the tailpipe for every kilometre travelled. The term typically refers to battery electric, plug-in hybrid electric and fuel cell electric vehicles.
- 5.10.2. Merton has the seventh highest proportion of ULE vehicles of all London boroughs; the proportion of vehicles in Merton has increased from 0.2% to 4.9% since 2014.
- 5.10.3. In 2018, 4.9% of vehicles registered in Merton were classed as ultra-low emissions, compared to 1.8% nationwide, 2.8% in London and 2.2% in outer London.
- 5.10.4. The graph below illustrates the total ownership of ultra-low emissions, compared to the national trend and London wide trends.



List of source - <https://www.gov.uk/government/statistical-data-sets/all-vehicles-veh01>

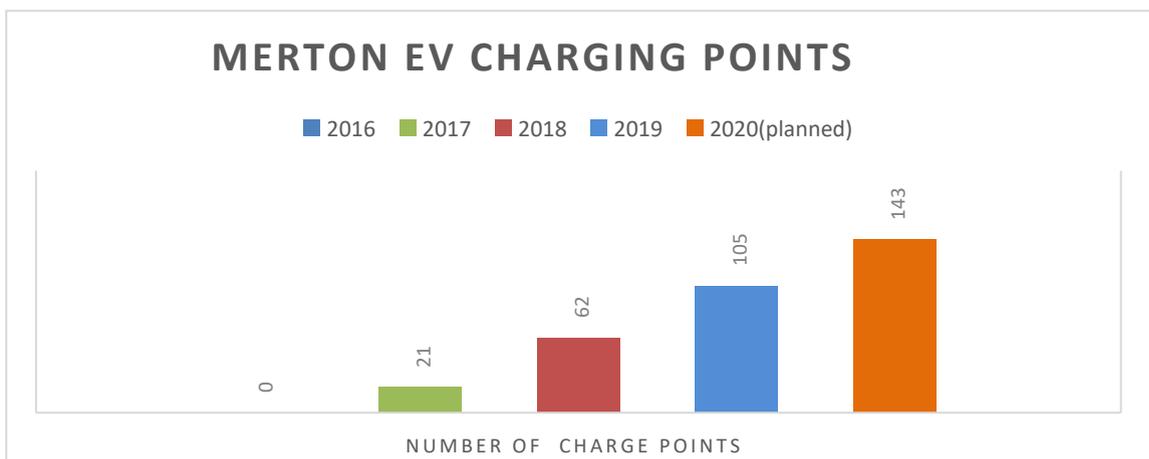
- 5.10.5. A hybrid car is one that uses two different energy sources to maximise efficiency. This usually means combining electrical energy stored in batteries, with the combustion energy of petrol or diesel fuel.
- 5.10.6. Evidence shows an indication that the hybrid electric and plug in hybrid cars were the most preferred purchase when it comes to alternative fuel up until 2018. All Hybrid vehicles had seen a 23% rise in new vehicle registered in the last two years from 2017 to 2018.

Proportion of vehicles registered for the first time



### 5.11. Electric vehicle charge points

- 5.11.1. London has seen a very rapid expansion of electric vehicles (EV) charging points to support the growth in EV car ownership and TfL have a number of projects to meet the demand. The Climate action plan is considering whether this increase is sufficient to support the anticipated increase in electric vehicle sales.
- 5.11.2. Merton has also recognised the growing infrastructure for electric charging points. In 2017, Merton had 21 charging points at nine locations; two years on these numbers have increased by 400% to 106 charging points across 41 locations throughout the borough. This is ahead of the London and national average per head of population. Merton plans to increase to 143 charging points across 62 locations throughout the borough during 2019/20.



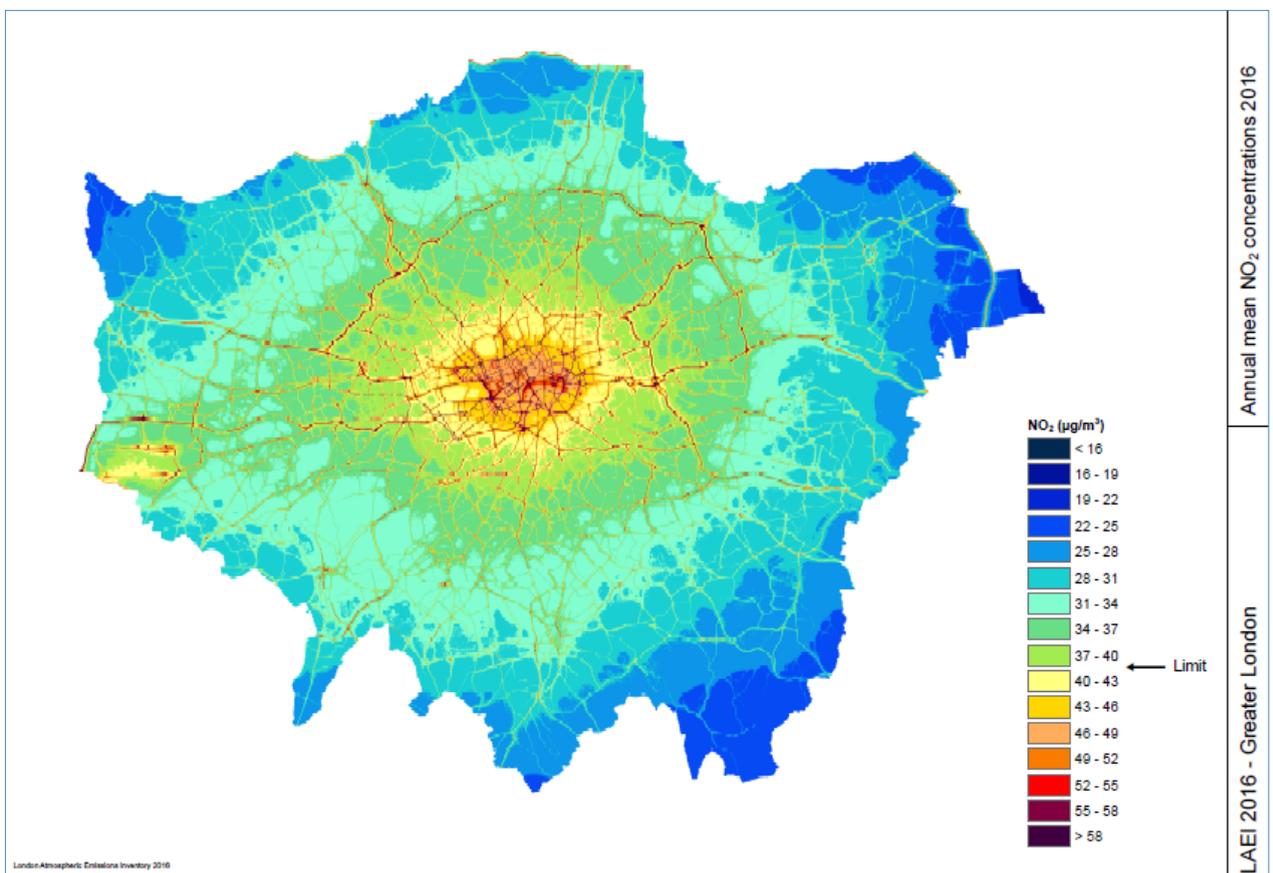
- 5.11.3. There are currently 106 publically accessible electric charge points in Merton as follows:
  - 101 Source London 7 kW chargers (96 on street and a further 5 serving Morden Leisure centre).
  - Five Rapid (50 kW) charge station (on the Transport for London Road network (TLRN)).

- This represent around 0.51 chargers per 1000 population.
- 5.11.4. A further 41 charge points are expected to be delivered by the end of 2019/early 2020, including (37 x 7kw) Source charge points, 2 x 22kw Source charge points and 2 x 50kw rapid charge stations (provider unknown at this stage).
  - 5.11.5. This will bring Merton's total to 147 or 0.74 electric vehicle charge points per 1000 population. Please note that Rapid and 22kw chargers are time limited to 2 hours to encourage turnover.
  - 5.11.6. Merton believes in delivering a mix of charging infrastructure to serve different needs of residents, visitors and businesses. The Council continues to receive a slow but steady number of requests for electric vehicles charge points
  - 5.11.7. There were 26 electric vehicle registrations in 2014 (SMMT data); predictions for 2019 are for between 600 and 650 EV registrations (this follows a noticeable drop off in 2018 compared to 2017).
  - 5.11.8. The usage of the charge points across the borough is generally increasing, particularly in the northern half of the borough. Many properties in the northern half of the borough have no access to off-street parking. Future sites will be mostly demand led and/or the expansion of existing locations where utilisation in high.
  - 5.11.9. The majority of charge points to date have been delivered in close partnership with Source London and SSE. Similarly, strong working relationships have also been established with TfL and London Councils.
  - 5.11.10. Merton has submitted an application to London Council's for a stage 2 Go Ultra Low City Scheme (GULCS) funding for up 25 electric vehicle lamp column chargers to meet emerging demand in quieter residential streets. These are anticipated to be delivered in mid-2020, subject to a successful GULCS bid. Additional Lamp column chargers are expected to be installed in future years.

## **6. EMISSION BASED CHARGING CONSIDERATIONS**

- 6.1. The evidence shows that fossil fuel vehicles give out emissions, which effect CO<sub>2</sub> and NO<sub>x</sub> levels. The emissions of individual cars depend on the fuel type, age of vehicle, design and the fuel used.
  - 6.2. TfL and 17 of the 32 London boroughs use a form of emission based charging model. These models have changed over the years to reflect the changes in vehicle manufacturing practices and improved knowledge the damage caused by different fuel types and engine design.
  - 6.3. Originally, the car tax banding was based very much on CO<sub>2</sub> emissions; however, since 2017 their charging bands now also reflect specifically diesel cars. In particular, newly registered el cars (TC49) that meet the RDE2 standard are charged at the same rate of many petrol cars, but diesel cars that do not meet the standard have to pay a higher rate. However, this does not however address the issue of older vehicles.
- 6.4. Air polluting nitrogen oxides (NO<sub>x</sub>) based charging by TfL**
- 6.4.1. In London, in addition to CO<sub>2</sub> there are two pollutants, which Merton wants to tackle as a priority because they have a major impact on health:

- 6.4.2. Nitrogen dioxide (NO<sub>2</sub>): At high concentrations, NO<sub>2</sub> causes inflammation of the airways. Breathing in high levels of NO<sub>2</sub> over a long period of time is associated with an increase in symptoms of bronchitis in asthmatic children and reduced lung development and function
- 6.4.3. Particulate matter (PM): Breathing in high levels of PM over a long period contributes to the risk of developing cardiovascular and respiratory diseases, including lung cancer. Research shows that small particles (those with a diameter of 10 microns and smaller) – PM<sub>10</sub> – are likely to be inhaled deep into the respiratory tract. The health impacts of the smallest particles (those with a diameter of 2.5 microns or smaller) – PM<sub>2.5</sub> – are especially significant, as smaller particles can penetrate even deeper
- 6.4.4. The scale of the air pollution crisis in London means further action is vital. NO<sub>2</sub> concentrations in 2016 are shown in the map below. Road transport is a significant source of nitrogen oxides (NO<sub>x</sub>), which forms harmful NO<sub>2</sub> in the atmosphere. At roadside areas where people are more exposed to air pollution, the contribution of transport is significantly greater.



## 6.5. CO<sub>2</sub> emission based charging by central government.

- 6.5.1. Vehicle Excise Duty (VED) – also known as vehicle tax, car tax or road tax – is essentially a tax for using a vehicle on public roads. It was introduced in 1937 and replaced the old system of road tax, which traces its roots back to the taxation of Hackney Carriages in the 17th century. The tax disc was introduced in 1921 and, until 1974; local authorities handled car taxation.

- 6.5.2. The government through their car tax changing policy is linked to CO2 emissions. Car tax bands allow different rates to be charged for different types of vehicle. Vehicles registered before March 2001 pay duty based on the size of the vehicle's engine. Vehicles registered after March 2001 pay vehicle tax based on a more detailed assessment of both fuel type and CO2 emissions. Newer, energy efficient vehicles pay less car tax generally than vehicles with larger, older engines.
- 6.5.3. More recently, the government introduced a higher charge for diesel cars (TC49) which do not meet the Real Driving Emissions 2 (RDE2) standard. You have to pay a higher rate for diesel cars that do not meet RDE2 standard for nitrogen oxide emissions. However, diesel cars who do meet the standard are not liable for the charge. Please see link to the VED tax bandings and charges. <https://www.gov.uk/vehicle-tax-rate-tables>

## **6.6. Clean Air Zones (CAZs)**

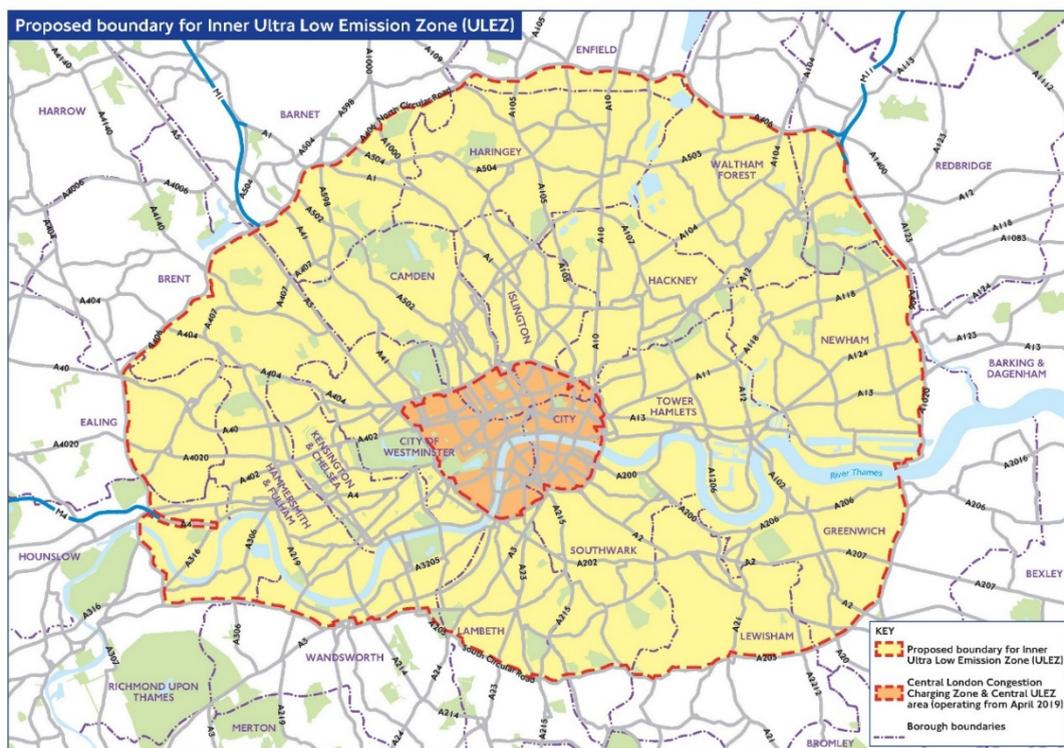
- 6.6.1. Merton's AQAP action point 27 refers to a feasibility study to consider the use of Clean Air Zones (CAZ's) or a Merton specific Ultra Low Emission Zone for Focus areas and beyond.
- 6.6.2. Several cities, including Birmingham, Nottingham, Southampton, Derby and Leeds, are also considering setting up Clean Air Zones in, with other cities to follow. Leeds only plans to charge Lorries, taxis and buses to enter the zone, but other cities could impose a daily surcharge for anyone driving a diesel car not conforming to the latest Euro 6 emissions standards. In Scotland, the major cities of Glasgow, Edinburgh, Aberdeen and Dundee are planning to introduce Low Emission Zones within the next year.

## **6.7. Councils approves plans to ban all diesel cars by 2021.**

- 6.7.1. BRISTOL is on track to become the first place in the UK to issue a blanket ban on all diesel-powered cars entering its city centre after Bristol City Council approved plans.
- 6.7.2. Bristol could forbid any privately registered car with a diesel engine, including ones that meet the Euro 6 emissions regulations that came into force in September 2015, from driving into the city from April 2021, should the idea get the final green light from parliament.
- 6.7.3. According to the council, the ban has been devised so the city can stick to its government-mandated emissions reducing targets, and ensure the city's average annual emissions of toxic nitrogen oxides, including nitrogen dioxide (NO<sub>2</sub>), do not exceed 40 micrograms per cubic metre by 2021.
- Source: Article published 07 November 2019, by James Allen.
- 6.7.4. Oxford is set to introduce a Zero Emission Zone, charging vehicles that produce any emissions to drive into the heart of the city centre, by the end of this year. The proposal will be consulted on from 31st January but likely to include charges for vehicles that do not meet Euro 6 diesel or Euro 4 petrol emissions standards.
- 6.7.5. The City of York's council has approved plans to ban private car journeys from its centre within three years as it attempts to become Britain's first car-free city. In an effort to cut carbon emissions, the council wants to end all 'non-essential' car journeys within the city walls from 2023.

## **6.8. Why introduce an Ultra-Low Emission Zone?**

- 6.8.1. The original Ultra Low Emission Zone (ULEZ) consultation took place between the 27th October 2014 and 9th January 2015.
- [https://consultations.tfl.gov.uk/environment/ultra-low-emission-zone/user\\_uploads/ulez-consultation-report-to-the-mayor.pdf-1](https://consultations.tfl.gov.uk/environment/ultra-low-emission-zone/user_uploads/ulez-consultation-report-to-the-mayor.pdf-1)
- 6.8.2. In the March 2015 TfL report to the Mayor of London the following was stated:
- 6.8.3. London has a policy framework in relation to improving air quality and reducing greenhouse gas emissions based on EU and UK law. The policies are set out in the London Plan (the Mayor's special strategy and in the Mayor's Transport Strategy, the Climate Change Mitigation and Energy Strategy and Mayor's Air Quality Strategy.
- 6.8.4. The Department for Environment, Food and Rural Affairs (Defra) has reported compliance with particulate matter limits for 2013 across England and Wales with most non-reportable sites in London also falling below legal limits. However, health evidence suggests that further reductions, especially for PM2.5, will bring about improvements in health and quality of life for Londoners, Crucially. Large sections of the Capital continue to exceed both the annual mean and hourly legal limits for NO2, which is likely to continue to occur beyond 2020 and this is why more action needs to be taken
- 6.8.5. The ULEZ was proposed to be the most efficient way to achieve further reductions of the most harmful road transport generated emissions in central London and across the Capital.
- 6.8.6. The Ultra-Low Emission Zone (ULEZ) replaced the T-Charge on 8 April 2019. It operates 24 hours a day, 7 days a week, every day of the year, within the same area as the Congestion Charge zone. Most vehicles, including cars and vans, need to meet the ULEZ emissions standards or their drivers must pay a daily charge to drive within the zone.



## **6.9. Central London Ultra Low Emission Zone – six month report published 21.10.19**

[https://www.london.gov.uk/sites/default/files/ulez\\_six\\_month\\_evaluation\\_report\\_final\\_oct.pdf](https://www.london.gov.uk/sites/default/files/ulez_six_month_evaluation_report_final_oct.pdf)

- 6.9.1. This report evaluates the impact of the central London Ultra Low Emission Zone (ULEZ) in its first six months of operation. A number of measures are used to assess the impacts of introducing the ULEZ on air pollution concentrations, including air pollution emissions, traffic flows and vehicle compliance.
- 6.9.2. Between February 2017 and September 2019, there has been a 32 micrograms per cubic metre reduction in roadside concentrations of nitrogen dioxide in the central zone, a reduction of 36 per cent. Trend analysis shows that, for the period July to September 2019, NO<sub>2</sub> concentrations at roadside locations in central London were on average 24 ug m<sup>-3</sup> lower, equating to a reduction of 29 per cent, compared to a scenario where there was no ULEZ.
- 6.9.3. In September 2019, the average compliance rate with the ULEZ standards was around 77 per cent in a 24-hour period (and 74 per cent in congestion charging hours). This is much higher than 39 per cent in February 2017 and the 61 per cent in March 2019 (congestion charging hours).

## **6.10. Air quality (ULEZ)**

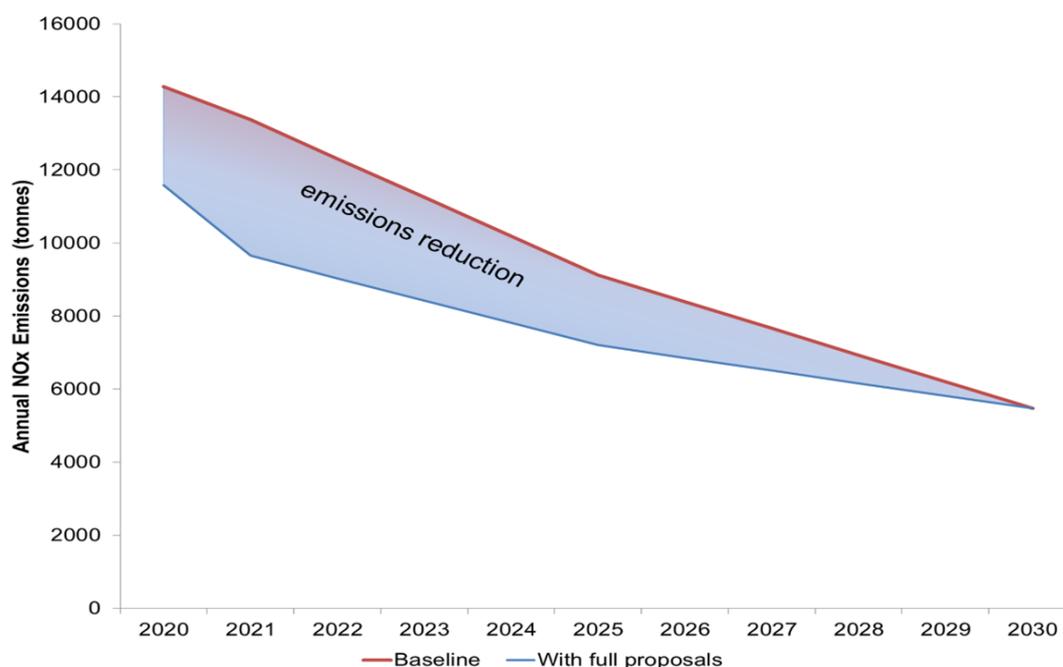
- 6.10.1. The Mayor of London, Sadiq Khan, said: “These figures prove without a doubt that ULEZ is exceeding expectations, reducing polluting vehicles and cleaning up our lethal air. I am determined to stop Londoners breathing air so filthy it is damaging their lungs and causing thousands of premature deaths.
- 6.10.2. “The ULEZ shows what we can achieve if we are brave enough to implement such ambitious policies. I now hope the Government will match my ambition and amend their environment bill to ensure it has the legally binding WHO recommended limits to be achieved by 2030 that we need to protect public health.”
- 6.10.3. Alex Williams, Transport for London's Director of City Planning, said: “The introduction of the ULEZ this year was a significant moment for Londoners' health, as the evidence of its first six months clearly shows. Nearly four out of every five vehicles now entering the zone meets the tough emissions standards, reducing harmful NO<sub>2</sub> pollution by almost a third. The early evidence suggests that the ULEZ is not only encouraging people to use cleaner private cars but also to use more sustainable alternatives such as walking, cycling and public transport. The ULEZ is also helping to reduce its impact on climate change – with an estimated reduction of road-based carbon dioxide by nearly 100,000 tonnes.”

## **6.11. British Lung Foundation (ULEZ)**

- 6.11.1. Dr Penny Woods, Chief Executive of the British Lung Foundation, said: “*The success of the Ultra-Low Emission Zone (ULEZ) is a fantastic example of the difference Clean Air Zones that charge the most-polluting vehicles, can make in reducing levels of pollution. We now want to see the ULEZ expanded to every polluted London borough to protect the lungs of every Londoner. In addition, critically, we know dirty air is not just a problem in London. Most UK cities have illegal and unsafe levels of pollution, which seriously effects the health and quality of life of the millions who have a lung disease and puts children at risk of developing a lung condition. That's why similar Clean Air Zones must be urgently rolled out across the country to protect everyone's lungs.*”

Source: London's Ultra Low Emissions Zone has caused 13,500 cars a day reduction.  
Article written by Brian Shillibeer.

- 6.11.2. The proposed changes to LEZ and ULEZ would bring significant emissions reductions to a wider area of London. There would be a 20 per cent reduction in NOx emissions London-wide in 2020. The graph illustrates the London-wide impact of these proposals to 2030. In inner London, there would be a 30 per cent reduction in NOx in 2021.



## 6.12. Cleaner bus routes for London

- 6.12.1. Low Emission Bus Zones are a key part of reducing London bus emissions and support the Mayor's wider target of raising our entire fleet to at least the ultra-clean Euro VI engine emission standard by 2020.
- 6.12.2. Together with the Mayor, TfL are leading by example by implementing 12 Low Emission Bus Zones to tackle the worst pollution hotspots outside central London. TfL are doing this by concentrating the cleanest buses on the dirtiest corridors. As of autumn 2018, seven zones are live:
- Putney High Street
  - Brixton to Streatham
  - High Road to Green Lanes
  - Camberwell to New Cross
  - Wandsworth to St John's Hill
  - A12 Eastern Avenue to Homerton Road
  - A5 Edgware Road, Kilburn to Maida Vale

- 6.12.3. The Low Emission Bus Zones represent the most extensive network of low emission zones of any major world city. Within these hotspots, Londoners have been exposed to some of the highest levels of nitrogen dioxide (NO<sub>2</sub>) pollution, with older buses contributing to roadside emissions.
- 6.12.4. All of TfL's scheduled buses travelling along the Low Emission Bus Zones will meet at least the cleanest engine standard, through a combination of new vehicles and upgrading mid-life buses with ultra-clean exhaust systems.
- 6.12.5. TfL are working to launch more zones and continue to retrofit specialist equipment to older buses along the Low Emission Bus Zones and introduce new buses in line with new contracts. This is bringing immediate benefits to those areas as each retrofitted bus emits a fraction of the harmful emissions, while others are brought up to this ultra-clean standard.
- 6.12.6. The benefits of operating cleaner buses will be felt across the capital, as the full length of bus routes take them beyond the Low Emission Bus Zones and further from the centre of London. The changes are expected to reduce bus emissions across the 12 zones by up to 80 per cent.



- 6.12.7. TfL plan to lead the way with their own network and have introduced seven Low Emission Bus Zones, which are already recording lower pollution levels on some of London's dirtiest traffic corridors. By the end of 2019, a further five zones will - this is earlier than the Mayor's previous target of 2020. Every new double-decker bus entering the fleet is now either a hybrid or zero-emission vehicle and from 2020, all single-deck buses entering the fleet will be zero emission. TfL are also delivering Europe's biggest electric double-deck bus fleet, helping London to become a zero-carbon city and improve air quality. Currently there are more than 150 zero emission buses in London and TfL are working toward making all buses zero emission at tailpipe by 2037.

By 2023/24...

 **790km**  
of track on our rail  
and Underground  
routes (from 725 km  
in 2018/19)

 **100%**  
of the bus fleet  
will have Euro VI  
engines (from  
65% in 2018/19)

**2** new, auto-mooring,  
accessible, hybrid-  
powered ferries  


**985**  
trains on our  
network (from  
970 in 2018/19)  


**32,000**  
daily cycle hire  
journeys (from  
29,000 in 2018/19)  


### 6.13. Mayor delivers £25m polluting car fund for low-income Londoners in October 2019

- 6.13.1. The Mayor of London, Sadiq Khan has delivered his latest measure to reduce London's harmful air - a £25m 'scrap for cash' dirty vehicle scheme for low-income and disabled Londoners. Motorists can get up to £2,000 for scrapping an older, more polluting car or motorcycle.  
<https://tfl.gov.uk/modes/driving/ultra-low-emission-zone/car-and-motorcycle-scrappage-scheme>
- 6.13.2. The new scheme is to run alongside the existing £23m fund for micro businesses, sole traders and charity owners who want to scrap older vans.
- 6.13.3. Polluting vehicles account for around 50 per cent of London's harmful NOx air emissions. Air pollution has an economic cost to the capital of up to £3.7 billion every year, and £20 billion cost to the country every year.
- 6.13.4. The scrappage scheme aims to help Londoners on low incomes or with disabilities, ahead of the Ultra-Low Emission Zone expansion in 2021 up to the North and South Circular roads. The scheme will run alongside the existing £23m fund for micro businesses, sole traders and charity owners who want to scrap older vans.
- 6.13.5. Motorists can apply for £1,000 for scrapping a motorcycle or moped and £2,000 for scrapping a car.
- 6.13.6. Alongside this, eligible applicants will be able to take advantage of a number of other offers and benefits such as one year's free membership of Santander Cycles for all journeys up to 30 minutes.
- 6.13.7. The Mayor of London, Sadiq Khan said: "Air pollution is a national health crisis that is stunting the lung development of our children and leading to thousands of premature deaths. City leaders across the world are united in raising the alarm about the dangers posed by poor air quality. Here in London with our bold plans we have already cut pollution by a third in central London where we have implemented the world's first Ultra Low Emission Zone and worked tirelessly to clean up the bus and taxi fleet.

- 6.13.8. “Despite the lack of Government support, our car and motorcycle scrappage scheme will enable low-income and disabled Londoners to scrap their older, polluting vehicles and switch to cleaner versions.
- 6.13.9. The applicant must also reside within the Greater London Authority boundary. TfL have an online tool to help people check whether their vehicle meets the ULEZ standards, which has been used almost 3.5 million times: [www.tfl.gov.uk/ulez](http://www.tfl.gov.uk/ulez).

#### **6.14. Euro standards and ULEZ**

- 6.14.1. To help standardise emission controls ‘Euro standards’ first appeared in 1992 - and are a range of emission controls that set limits for air polluting nitrogen oxides (NOx) and particulate matter (PM) from engines. New vehicles and road vehicle engines must show that they meet these limits to be approved for sale.
- 6.14.2. NOx emissions generally on newer cars are improving and the review considered the charging models adopted by TfL for their Ultra Low Emission Zone charging policy.
- 6.14.3. Petrol cars that meet the ULEZ standards are generally those first registered with the DVLA after 2005, although cars that meet the standards have been available since 2001.
- 6.14.4. Diesel cars that meet the standards are generally those first registered with the DVLA after September 2015.
- 6.14.5. Specifically to be exempt from charges and meet the ULEZ standards a vehicle must be:
- Euro 3 for motorcycles, mopeds, motorised tricycles and quadricycles (L category)
  - Euro 4 (NOx) for petrol cars, vans, minibuses and other specialist vehicles
  - Euro 6 (NOx and PM) for diesel cars, vans and minibuses and other specialist vehicles
  - Euro VI (NOx and PM) for Lorries, buses and coaches and other specialist heavy vehicles (NOx and PM).
  - Euro 3 became mandatory for all new motorcycles in 2007.
  - Euro 4 became mandatory for all new cars in 2005 and light vans in 2006.
  - Euro 6 became mandatory for all new heavy duty engines for goods vehicles and buses from January 2014, September 2015 for cars and light vans, and September 2016 for larger vans up to and including 3.5 tonnes gross vehicle weight.
- 6.14.6. The figure below shows the charges approved by TfL for entering the ULEZ zone, and how each vehicle type is charged. For example, the first column highlights the vehicles groups (Euro Rating) and the second column identifies the cost dependent upon whether the vehicle is petrol or diesel type.

ULEZ	
from 08/04/2019 24 Hours, 365 days	
<b>Most cars registered before 2006</b> EURO EMISSION STANDARD <b>1</b> <b>2</b> <b>3</b>	Petrol car <b>£12.50</b> Diesel car <b>£12.50</b>
<b>Most cars registered 2006 - August 2015</b> EURO EMISSION STANDARD <b>4</b> <b>5</b>	Petrol car <b>FREE</b> Diesel car <b>£12.50</b>
<b>All cars registered since September 2015</b> EURO EMISSION STANDARD <b>6</b>	Petrol car <b>FREE</b> Diesel car <b>FREE</b>

6.14.7. The enforcers behind London's Ultra Low Emissions Zone say the scheme has already brought about a reduction of 13,500 cars a day - and thus cut toxic air pollution by a third.

Since introducing the Ultra-Low Emission Zone (ULEZ), new data reveals that:

#### Key Findings

On 8 April 2019, the Mayor of London launched the world's first Ultra Low Emission Zone (ULEZ). Six months on, data indicates the scheme is having a significant impact – although further analysis will be needed to fully assess the long-term impacts.

This report includes data from February 2017 (when the Mayor confirmed the T charge and the accelerated change in the vehicle fleet began); March 2019 (the month before the scheme was introduced) and April – September 2019 (the first six months of the scheme).

Key findings from the first six months of operation are:

- After the first six months of operation the average compliance rate with the ULEZ standards was 77 per cent in a 24-hour period (74 per cent in congestion charging hours). This is significantly higher than 39 per cent in February 2017 and the 61 per cent in March 2019 during congestion charging hours
- Between February 2017 and September 2019, there has been a 32 micrograms per cubic metre (ug m-3) reduction in roadside concentrations of nitrogen dioxide (NO2) in the central zone, a reduction of 36 per cent
- Trend analysis shows that, for the period July to September 2019, NO2 concentrations at roadside locations in central London were on average 24 ug m-3 lower, equating to a reduction of 29 per cent, compared to a scenario where there was no ULEZ
- Preliminary estimates indicate that after six months NOx emissions from road transport in the central zone have reduced by 31 per cent (200 tonnes) compared to a scenario where there was no ULEZ. This is ahead of schedule to meet the 45 per cent NOx emissions reduction expected in the first year

- Preliminary estimates indicate that after six months CO2 emissions from road transport in the central zone have reduced by 4 per cent (9,800 tonnes) compared to a scenario where there was no ULEZ. When compared to 2016, this equates to a 13 per cent reduction, assuming current compliance rates continue for the remainder of the first year of operation
- None of the air quality monitoring stations located on ULEZ boundary roads have measured an increase in NO2 concentrations since the introduction of the ULEZ
- Preliminary analysis of traffic flows indicate that the introduction of the central London ULEZ has contributed to a reduction in traffic flows in central London from May to September 2019 of between 3 – 9 per cent when compared to 2018, though further analysis is needed to better understand long term complex changes in traffic flows as a result of ULEZ
- From March to September 2019 there was a large reduction in the number of older, more polluting, non-compliant vehicles detected in the zone: some 13,500 fewer on an average day, a reduction of 38 per cent in congestion charging hours. This is higher than the 9,400 reduction reported after one month and the 12,500 reduction reported after four months
- There was a 34 per cent decrease in the proportion of vehicles in the central zone that were non-compliant from March 2019 to September 2019 in congestion charging hours

To fully understand the impact of the scheme it is necessary to take into account pre-compliance (i.e. people and businesses preparing ahead of time for the start of the new scheme). With this in mind, the changes between February 2017 and September 2019 were as follows:

- There was a large reduction in the number of older, more polluting, non-compliant vehicles detected in the zone: a reduction of 40,200 vehicles on an average day, equating to a 65 per cent reduction
- There was an 89 per cent increase in the proportion of vehicles detected in the central zone that were compliant from February 2017 to September 2019

## **6.15. Expansion (ULEZ)**

- 6.15.1. From 25 October 2021, the ULEZ boundary will be extended to create a single larger zone bounded by the North and South Circular Roads. If you are driving any petrol or diesel vehicle within the expansion, you will also need to meet the tighter emissions standards or pay a daily charge. This daily charge is in addition to the weekday Congestion Charge if you drive in central London as well. Vehicles using the North and South Circular Roads and not going into the ULEZ will not be charged.

## **6.16. Emission based charging by other London boroughs**

- 6.16.1. Building on the principles and rationale of the charges introduced in January 2020, officers have explored the case for emission based charging for resident permits and parking charges for on and off street in our car parks. The review looked at experience of other councils in implementing such schemes – the benefits and disadvantages of such a scheme and the potential impact this can have on driver behavior and air quality.
- 6.16.2. A total of 17 out of the 32 London Boroughs have now introduced some form of emission based charging. A wide range of different charging structures has been introduced throughout each borough.
- 6.16.3. The review considered the benefits of emissions based charging that has been adopted by other London Boroughs in respect of parking permits. There are 13 categories, which can be used for emission based charging, as currently used by the Government for the taxing of vehicles. Some authorities have adopted a charging model, which operate this verbatim; others have grouped these categories together to reduce the number of categories.
- 6.16.4. For example, Barnet Council has five different emission based structures from a 'Green' band to higher band along with a diesel levy surcharge whereas Haringey have their emission charge based across 13 different bands, which only address Co2 emissions.
- 6.16.5. Camden Council who have introduced 4 tariff charges based on CO2 emissions, including a diesel surcharge to their permits, have seen a decrease in Permit sales 6% from 2017 to 2018. The highest decrease of any other London council where data is available. As well as charging residents and business permits, Camden have introduced these charges to doctor permits and market traders.
- 6.16.6. Currently in Merton, the diesel levy is charged on Residential, Business, Teacher and Trade Permits. If a VED emission based only charging model for permits was adopted this would limit Merton's ability to address the NOx emissions caused by diesel vehicles.

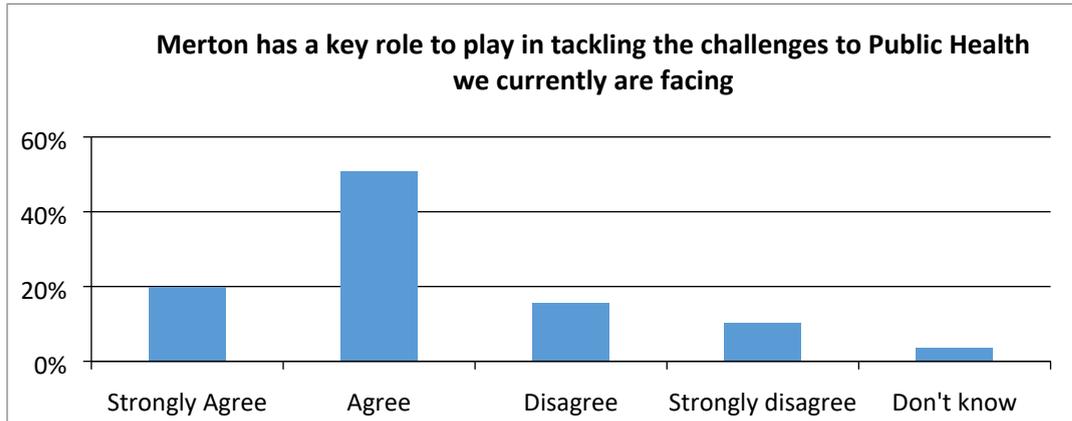
## **7. Current charging principles from 14 January 2020**

- 7.1.1. In considering a model of emission based charging, it is important to consider the existing strategic approach to parking charges, and complement our existing policies.
- 7.1.2. Further to an extensive consultation, Merton took the decision in 2019 to simplify the charges and sought to further strengthen and develop the links between Public Health, air quality, and climate agenda and how future charges can moderate parking behavior.
- 7.1.3. Because of this decision, a new charging structure became operational in January 2020, based on four basic principles:
  - (i) Ease of access to public transport
  - (ii) Air Quality and climate indicators
  - (iii) Parking demand and space availability
  - (iv) Enforcement requirements.

7.1.4. The review considered the recent consultation in respect of public health, air quality and sustainable transport – a strategic approach to parking charges, which had very useful information. Appendix 1 contains and extract from the parking charges consultation from May 2019, which are relevant to this report.

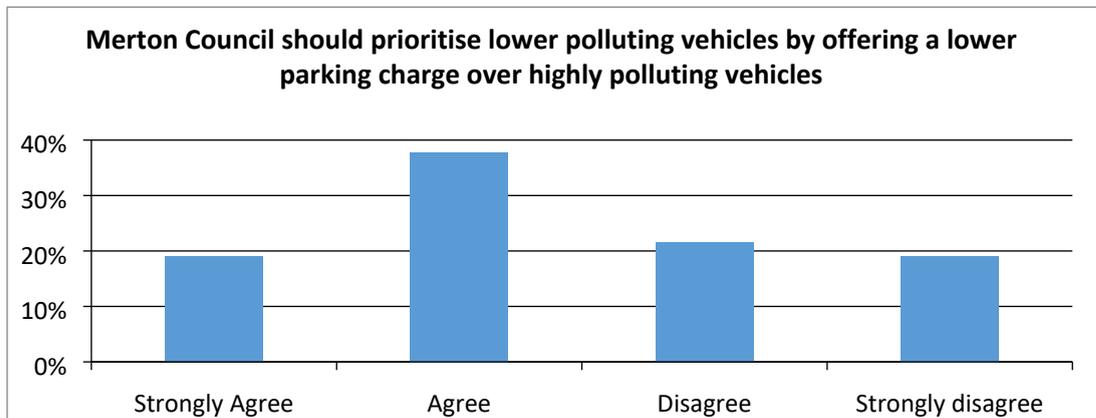
**Public Health & Air Quality**

7.1.5. 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%).



**Prioritising vehicle type.**

7.1.6. 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.



**8. Proposed emission based charging options**

8.1. The model recommended below, builds on the existing principles set out in 30.1.3, which includes the location of a property in relation to Public Transport, known as (PTAL), and length of time a controlled parking zone is enforced for. The principle of a Permit charge based on the location of a property in relation to transport links forms an integral and complimentary part of the proposed emission based model. Merton is keen for residents and visitors alike to first and foremost use active transport such as walking and cycling. If however a vehicle is required, the vehicle should be as least polluting as possible.

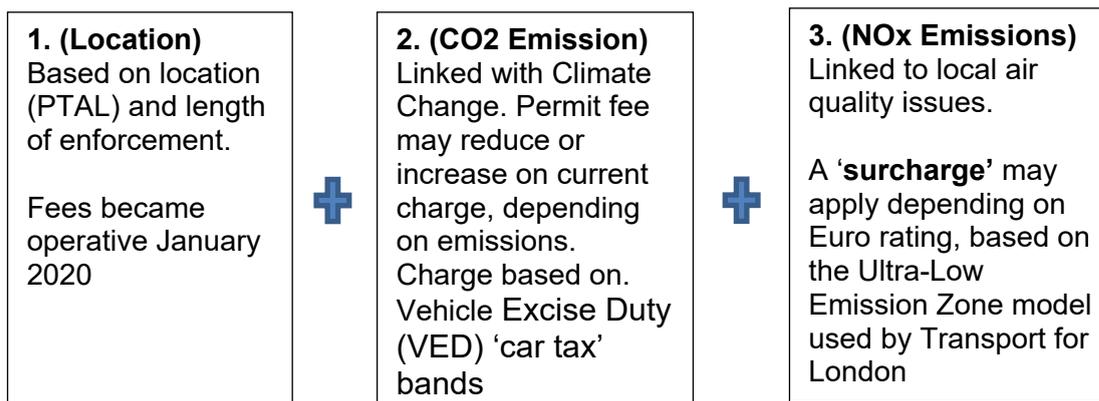
The table below shows the current cost for a permit in each respective Controlled Parking Zone.

<b>Zone duration</b>	<b>Tier 1 zones</b> Wimbledon Town Centre	<b>Tier 2 zones</b> Part Colliers Wood/ South Wimbledon/ Rayne's Park/ Morden	<b>Tier 3 zones</b> Mitcham/ Part Colliers Wood	<b>*100% electric vehicles</b> 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

8.2. Based on the evidence in this report and as an outcome of the review, it is recommended that Merton updates its charging policy to reflect and address:

1. Public Transport Access Level (PTAL) & length of enforcement,
2. CO2 emissions, and
3. NOx emissions

8.3. Example of the principles applied for Permit charges.



**8.4. Vehicle Excise Duty (VED) model - addressing CO2 emissions.**

8.5. It is recommended to introduce a VED model, which is based on the principles of the 'car tax'. The car tax bandings range from A to M, with category 'A' being for the least polluting vehicles and M the highest. VED was introduced by the government to move vehicle owners away from higher CO2 polluting vehicles and is familiar to motorists.

8.6. VED charging may result in some permits actually being reduced in price to reflect the emissions of the vehicle, but for owners of higher polluting vehicles a higher charge may be applicable. Proposed models are shown in Appendix 2.

**8.7. ULEZ based model addressing NOx emissions.**

8.7.1. As part of Merton's commitment to addressing local pollution caused by NOx and particulates emissions, it is recommended an appropriate 'surcharge' will also be applied based on the TfL model. The ULEZ based model, which is recommended, will replace the existing Diesel Levy surcharge.

- For all vehicles manufactured before 2006 (which are primarily rated EURO 1, 2 & 3s) a proposed surcharge would be applicable, e.g. £150.
- For **petrol** vehicles registered between 2006 and September 2015, which are EURO 4 and 5 rated, there is no surcharge.
- For **diesel** vehicles registered between 2006 and September 2015, which are EURO 4 and 5 rated, a proposed surcharge would be applicable, e.g. £150.
- Euro 6 cars which are manufactured since September 2015 will not have a ULEZ charge applied in line with TfLs model.

The table below is an illustrative example to show how the above ULEZ type surcharge would be applied.

	<b>PETROL + DIESEL</b>	<b>PETROL</b>	<b>DIESEL</b>	<b>PETROL + DIESEL + ELECTRIC</b>
	Pre 2006 (EURO 1/2/3)	Between 2006 - August 2015 (Euro 4/5)	Between 2006 - August 2015 (Euro 4/5)	Post September 2015 (Euro 6)
Illustrative surcharge	£150.00	No Charge	£150.00	No Charge

## 8.8. Proposed Emission based charging models for each permit type.

8.9. Appendix 2 sets out an illustrative model to reflect the structure and type of emissions based charging model that is being proposed, including:

- Residents Permits
- Business & Traders Permits
- Teachers Permits
- Annual Visitor Permits
- Half/full day visitor permits
- On street Parking
- Off Street (Car Park Parking).

8.10. A full consultation process will be undertaken as part of this review on the new proposed emission based charging model and will include Residents, Businesses, key stakeholders, and community and equality groups. The details surrounding the consultation is set out in section 14 below.

8.11. The illustrative figures contained in appendix 2 will be subject to further review by the Sustainable Communities Overview and Scrutiny Committee and Cabinet following the consultation exercise. The model remains in draft at this stage and will be developed as the proposals go through further democratic and public oversight. The Sustainable Communities Overview and Scrutiny

Committee at this stage, is not being asked to propose and agree a final set of charges, but to examine in detail the policy rationale that this paper sets out. Notwithstanding this, Members may wish to include their emerging thoughts for Cabinet consideration.

### **Residential, Business, Teacher and Trade Permits.**

- 8.12. As set out above in 8.3 Residential, Business, Teacher and Trade permits charges will be a combination of a VED charge and a ULEZ based surcharge depending on vehicle emission and Euro rating.

### **Annual visitor Permit**

- 8.13. Annual Visitor Permits are not vehicle specific. It is therefore not possible to know which vehicle the permit is being used in and how polluting it is. Charges have therefore been set from January 2020 to include the existing diesel levy surcharge. The Annual visitor Permit in the proposals in this report will be linked to the higher emission charge and will include a ULEZ based surcharge in the standard price.
- 8.14. As part of an emission based charging policy, a permit should be linked to individual vehicles. It is therefore recommended that Annual Visitor Permits are phased out by no later than April 2021, or the charge should reflect the VED charge plus a ULEZ surcharge

### **Scratch cards and visitor e-permits.**

- 8.15. Similar to the annual visitor voucher 8.12 also applies to Visitor Scratch Cards
- 8.16. The principle of emission based charging will also need to be applied to all Visitor Permits. At present, there is a flat fee irrespective of the type of vehicle the visitor permit is being used in.
- 8.17. It is recommended that there is a phased removal of scratch cards by April 2021. As part of the consultation, there will be a specific focus, with equality groups, to consider the impact on customers who are unable to buy vehicle specific permits online or via a smart phone. An alternative method of providing scratch cards may be through libraries, partner groups e.g. Age UK Merton, and other customer access points.
- 8.18. In January 2020, Merton introduced the ability to sell e-visitor permits via the RingGo APP and online as an alternative to the traditional scratch card. Officers will continue to review the uptake of 'virtual/electronic' visitor permits.

### **On and off street**

- 8.19. Merton does not currently have an emissions-based model for motorists that park on the street or in our car parks for business or leisure purposes. The current charge is based on location, capacity and duration, with the aim to achieve regular turnover of spaces or permit longer-term commuter parking as appropriate. The current charges do not take into account consideration of the type of vehicle driven and parked and the environmental damage being caused because of the journey. In order to encourage motorists to change behaviours it is considered appropriate that a charging model is implemented to discourage parking of high polluting vehicles across the borough.
- 8.20. Members are reminded of the Sustainable Communities Overview and Scrutiny Panel of 15<sup>th</sup> March 2017 in which a proposed charge for diesel vehicles be applied to council car parks. At the time, technology limited the ability to

introduce such a charge. However, as set out below in 8.21 to 8.26, the technology now exists and an infrastructure upgrade is being planned.

- 8.21. As an illustration a one of charge of £1.50 would be applied on top of the cost of each short term parking session, based on the ULEZ model at all pay and display parking locations, both on street and in council owned car parks.
- 8.22. In respect of Season Tickets in Car Parks, in January 2020 vehicles buying a 'season ticket in council owned car parks became liable to pay the diesel levy surcharge. As an illustration a charge of £150 could be applied in a ULEZ based model.

### **Emission based charging – operational considerations**

- 8.23. In order for any emission based charging for pay & display parking Merton will need to replace our current stock of pay & display machines, as they are not capable of determining vehicle type. New machines are required to allow a vehicle registration number to be entered and for an appropriate fee to be charged based on the emission of the individual vehicle.
- 8.24. There are currently 429 pay & display machines in Merton. Analysis shows that 80% of all transactions are achieved through 100 machines. Officers will be undertaking a review of the existing parking machine provision with a view to rationalising underutilised machines. New parking machines will need to be purchased and installed prior to the implementation of any emission based charging scheme.
- 8.25. At locations where there is no pay & display machines customers can use the RingGo service to pay for their parking. The current RingGo parking system, which is currently used by the majority of parking customers, is capable of charging an appropriate fee based on vehicle emissions and type of vehicle.
- 8.26. It is acknowledged, that a number of customers still use cash to pay for their parking and provision for these customers should continue. The removal of all machines and a 100% cashless parking system throughout Merton, which has occurred in some London boroughs, will remain under review. In locations where there is limited use, machines may be removed.

### **Bay suspensions and 'Permitted Parking' applications**

- 8.27. Parking Services also offer a Bay Suspension and 'Permitted Parking' Services, which are in high demand. These services are used by residents moving house or undertaking maintenance work at their own property, domestic removals, mobile workshops to larger companies doing necessary utility works around the borough and special events. There is considerable administration cost involved, not only for the back office but for the Engineers who implement the suspensions on street with signs, notices and cones as appropriate. These charges have not been reviewed for a number of years and benchmarking information is shown below.

#### Bay suspensions

- 8.28. At present there is a £25 administration fee that is applied to every application. This charge has not been reviewed in a number of years and does not reply the actual cost involved in processing the application. It is recommended an administrative fee of £50 is applied for all standard applications.
- 8.29. In order to check and process these applications Parking Services requires a minimum of 7 full working days' notice (excluding weekends/bank holidays or

the day the application was sent). Unfortunately many late applications are received and although we endeavor to accommodate these requests there is an additional cost to the council.

- 8.30. It is therefore recommended that to cover cost, a premium charge is implemented, for application made between 3 and 6 days before the suspension is required. (Less than 3 days is not possible). If after assessing the feasibility of the application, we can accommodate the request, a premium charge of £100 is recommended. Adding this new additional service to accept late applications would be beneficial to utility companies or applicants who need a suspension on such short notice. There is also a set price of £25 per bay per day and it is recommended this charge is increased to £40.

#### 'Permitted Parking'

- 8.31. Permission is given by Parking Services for customers to park on single yellow lines and other locations which do not cause traffic hazards or safety issues. The current charge is a flat rate of £13.20 per day, which does not reflect the administration cost of the service. It is therefore recommended that the charge be increased to a one off payment of £25 per day.

### **9. Financial, resource and property implications**

- 9.1. 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. At this stage, the proposed model is very formative, and will require further analysis once the results of the consultation exercise are known.
- 9.2. A revised emissions based charging model with full projected financial implications will be presented to Members in summer 2020 after the consultation period and results have been analysed.
- 9.3. 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.
- 9.4. 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 statutory traffic management and key sustainability objectives.

### **10. ALTERNATIVE OPTIONS**

- 10.1. Change the price of the existing diesel levy, by increasing the surcharge. This would only have an effect on Diesel vehicles, and would not address the more polluting petrol vehicles.
- 10.2. There are a significant amount of variables contained in the proposed emissions model, i.e. you could use less bands, or the range of charges could vary for example, from the figures proposed. The figures could be higher or lower however it is important that the charging prices are set at an appropriate level to encourage the right behaviors.

- 10.3. Use an alternative to a ULEZ based model. As set out in the report some UK towns are looking to ban cars at certain location or have 'zones' which allow only certain vehicle types. These may be appropriate for other areas of the country, but not considered practical in Merton due to its many boundaries with neighboring boroughs. In addition, there is considerable through traffic within Merton, whereas in many of the 'zone' type schemes, the zone is often the final destination.
- 10.4. A further option is not to implement an emissions-based model 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.

## 11. Legal and statutory implications

Legal and regulatory requirements of Parking and transport management.

### Statutory Provisions

- 11.1. 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”.*
- 11.2. 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.
- 11.3. 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.
- 11.4. 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 neighborhood or the provision of such parking accommodation is likely to be encouraged there by the designation of parking places under this section.

11.5. 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

- 11.6. 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'.
- 11.7. In this case, it is recommended to undertake a full TMO amendment procedure (rather than a Variation procedure) to enable a comprehensive and detailed consultation process.
- 11.8. Regulation 7, The Local Authorities Traffic Orders (Procedure) (England & Wales) Regulations 1996 provides for a 'notice of proposals' to be published in a local newspapers and London Gazette, and take such other steps to publicise the proposed Order which may include street notices or letters to affected addresses

#### Fiscal Implications

11.9. 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."*

11.10. 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 (Atfield) v London Borough of Barnet* [2013] EWHC 2089 (Admin).

#### Application of Revenue

- 11.11. 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.*
- 11.12. In addition, for London authorities, this includes the costs of doing anything “which facilitates the implementation of the London transport strategy”
- 11.13. 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)

- 11.14. 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.
  - (d) (Public Sector Equality Duty (s.149 Equality Act 2010))
- 11.15. 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
- 11.16. 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.

- 11.17. The PSED is a duty to have due regard to the specified issues, and not to achieve a particular outcome.
- 11.18. Members should have due regard to the Council's draft Equality Assessment which accompanies this report.

#### Decision-making - General Principles of Public Law

- 11.19. In considering his Report and coming to their decision, Members should ensure that the decision is one, which is rational in public law terms.
- 11.20. 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

- 11.21. 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

## **12. Consultation Process**

- 12.1. 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.
- 12.2. The consultation period will start in May 2020 to ensure that there is sufficient time to fully engage with residents, stakeholders, and community and equality groups. To complete this exercise in advance of May is difficult given the Easter holiday during mid-April and the start of the purdah period from late March.
- 12.3. In addition, the council extended its consultation period in 2019 with regard to the new parking charges proposal to ensure sufficient time so that full consideration could be given to all representations.
- 12.4. This consultation will form part of a statutory consultation process, and meet the council legal obligations, which includes a requirement to bring the proposals to as wide an audience as possible.
- 12.5. To ensure the council generates as much feedback as possible, representations will be invited in writing, online via the web page, or by email to a dedicated email box. In addition, an online survey will be available.
- 12.6. As well as the online consultation, the council will also:
  - Attend Community Forum meetings during the period of the consultation
  - Follow the statutory Traffic Management Order (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 will be made available on deposit at all libraries and at the Civic Centre for public inspection/reference.
- Consult with statutory and non-statutory consultees, including Businesses, Business Improvement Districts and the Chamber of Commerce.
- On the council's home page, we will display a link to the consultation web pages. The web pages gave full details of the proposal along with background papers and reports. The pages will also include a section, which aims to address frequently asked questions.

12.7. A number of statutory bodies will be consulted as part of the Traffic Management Order making process.

### **13. Human rights, equalities and community cohesion**

1.1. The draft EA is attached as Appendix 3

1.2. The draft EA sets out the overarching aims objectives and desired outcome of the proposal and their contribution to the council's corporate priorities. It also includes a detailed background on who will be affected by this proposal and the evidence the council has considered as part of its assessment.

- The draft EA draws up a list of areas of concern and ways to remove or minimise negative impact/discrimination
- To consult appropriate stakeholders as part of the review. Formulate an action plan to tackle issues arising from the draft EA.
- A copy of the outcome of the draft EA will be published on the councils' website.
- The draft EA Plan will be reviewed in 12 months' time, notwithstanding this, it should be noted that if approved, the policy would be kept under review and representatives of the affected groups would be consulted with to assess ongoing impact and consider further mitigation. Adjustments would be brought forward for Members' consideration as appropriate.

#### **Equality Groups**

1.3. Advice will be sought on the appropriate equality groups with protected characteristics, relevant to this proposal, in order to consult with directly to seek view and opinions.

1.4. In addition, a copy of the consultation documentation will be sent to Merton Voluntary Sector Council act (MVSC) who in themselves have direct links to over 800 voluntary groups and organisations in Merton.

### **2. Crime and Disorder implications**

2.1. None

### **3. Risk management and health and safety implications**

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

## 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** <https://democracy.merton.gov.uk/documents/s28218/HWS%20Appendix%201.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](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 2019** <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/>

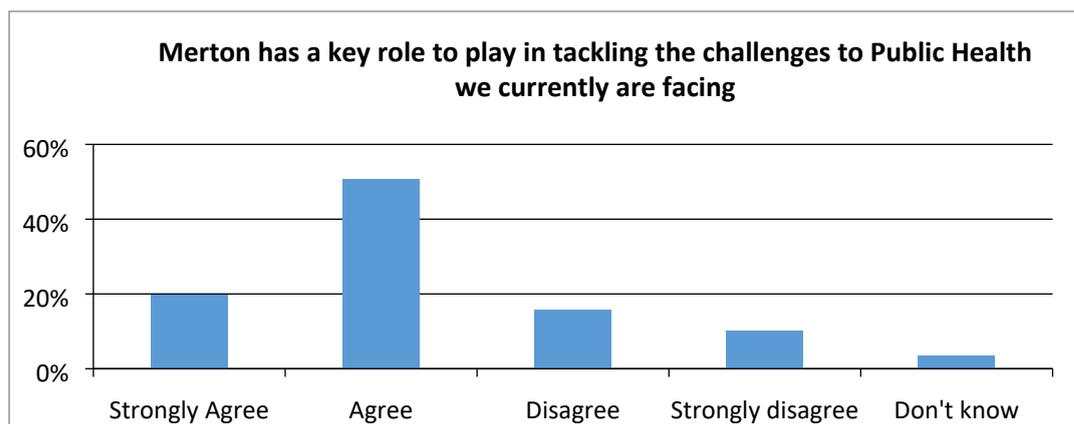
**EXTRACT FROM ONLINE SURVEY CONSULTATION RESULTS MAY 2019**

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.

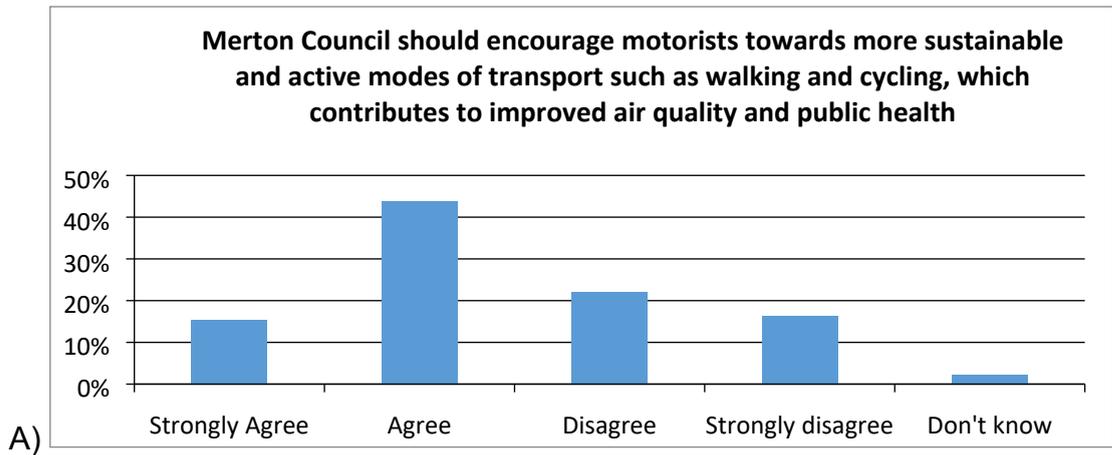
**Q1 PUBLIC HEALTH & AIR QUALITY**

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%).



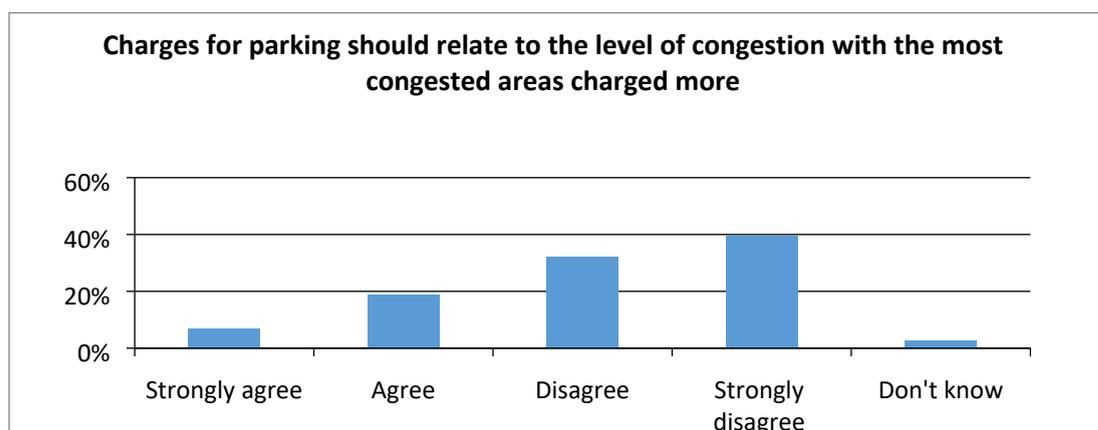
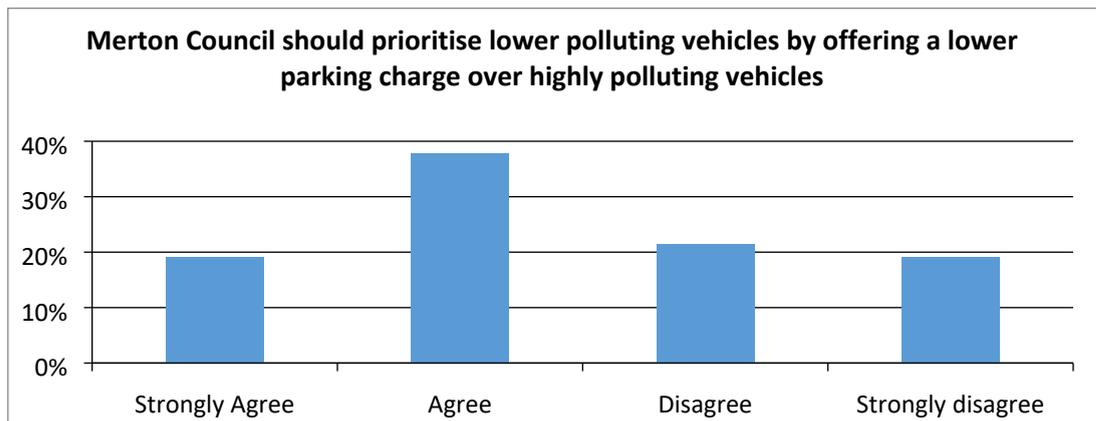
**Should Merton encourage active travel and use of public transport?**

A) 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%).



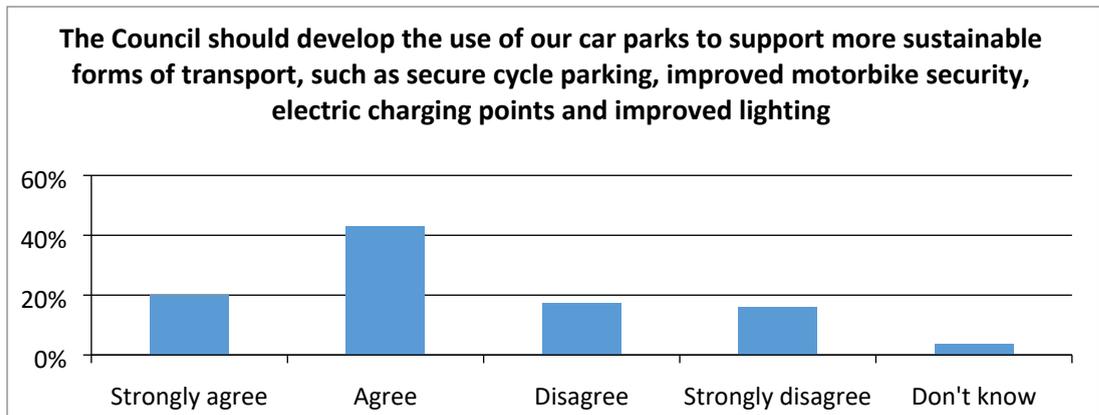
**Prioritising vehicle type.**

A) 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.



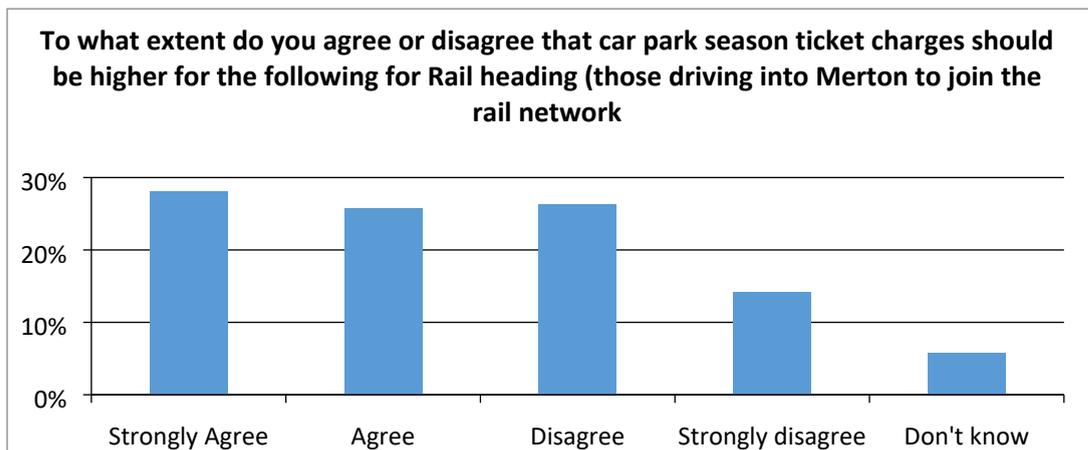
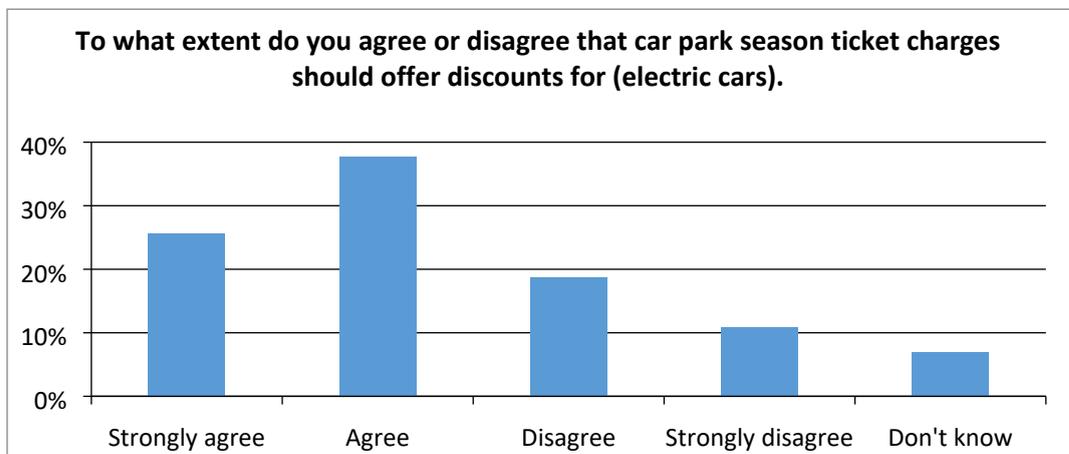
**Should Merton develop the use of car parks?**

A) 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%).



**Should Merton offer discounts to Electric vehicles in Car Parks?**

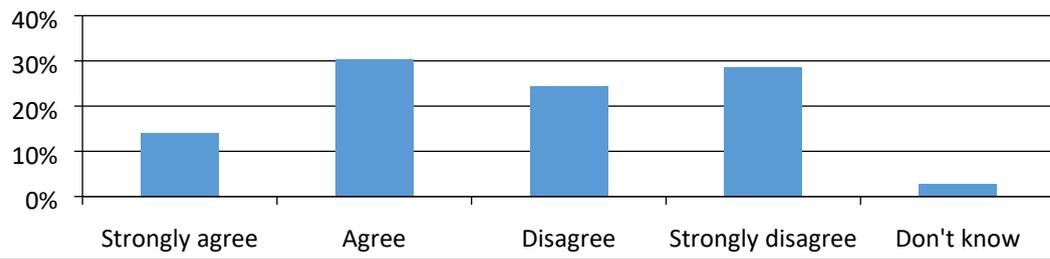
A) Nearly two thirds of respondents (64%) agreed that electric vehicles should receive a discount on season tickets with 30% disagreeing. Non-car owners were more likely to agree (69%).



**Car Fuel Type**

A) 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%)

**Charges for residents parking permits should be lower for electric vehicles and least polluting vehicles and higher for the most polluting vehicles**



## LIST OF REASONS WHY CUSTOMERS HAVE RECENTLY CHANGED THEIR VEHICLES

<b>Diesel to Petrol</b>
Impending ULEZ expansion, Permit cost for petrol is reduced, wanted a petrol car with a Direct Shift Gear
I was not happy with the choice of a diesel car due to pollutants. This was the primary reason for the change.
The old car needed work so was cost effective to change it. The new petrol engines are as fuel efficient as the diesels and therefore as petrol is cheaper it makes sense to change
I bought a diesel car because the Labour Government urged us to do so. The diesel car is more economical to run than a petrol one. I bought a petrol car because of the cost of my parking permit.
I changed permits type because your charge was so high for diesel cars..... next media hype will probably say that petrol cars are worse than diesel !!!!!
I will try to avoid diesel cars in the future as it now appears that they are worse for the environment than had hitherto been thought. The ULEZ charge is also a significant factor. Local parking charges are less of a factor.
Changed my car from diesel to petrol because tax and insurance are cheaper and I am helping environment a bit more with the petrol. My next step would be getting a hybrid or a fully electric.
My initial reason for changing my car was so I could drive in the ULEZ zone and also keep my cost down on road tax and parking cost. I only use my car at the weekend.
More cost effective
Do not drive much and more cost effective
Cheaper
Emissions and costs
Diesel surcharge & ULEZ
Cheaper to park because of the levy
Diesel levy too high especially with new parking charges
Hybrid, better for environment and cheaper permit
<b>Petrol to Diesel - Reply</b>
This is a temporary change as I am expecting a plug in hybrid, which is my preferred choice over diesel.
My Petrol car was old and needed replacing - I now have a fuel efficient EURO 6 diesel engine, there was no petrol alternative available at that price.
My PCP car agreement ended, and instead of getting another petrol, I got a diesel car.
Needed a new car. I checked that new diesel car was ULEZ compliant and low polluting prior to purchase so was disappointed to find I was penalised by Merton
My previous car was stolen, that is why I bought a new one.
We needed a 7 seater car - there are very few 7 seat petrol powered vehicles available (and no EV options either). The diesel car we bought is a 2019 model so is the most advanced Diesel engine available. I expect our next car will have a different powertrain. At that point we will likely consider an EV but there would need to be significantly more charging infrastructure available before we made that leap.

I would love to have been able to change to an electric Tesla, however that is beyond my budget.
I needed a larger 4x4 car which was cheap. If electric cars were cheaper I would buy one. It was a cost issue.
I bought a new car. I wasn't specifically looking for a diesel car - it met all my requirements and just happened to be a diesel rather than a petrol car.
The car is diesel hybrid - which means it is environmentally friendly in cities.
I changed my car to a diesel because it is more economical plus its eco 2 supposed to be environmentally friendly and the petrol car was costing me more money, if I could afford to buy an electric car there would be no hesitation,
Diesel more cost effective for long journeys
Electric is too expensive, diesel vans are cleaner and they do not have petrol vans

## LETTER FROM LEADER OF THE COUNCIL TO THE MAYOR OF LONDON

COUNCILLOR STEPHEN ALAMBRITIS  
LEADER OF THE COUNCIL  
(Labour, Ravensbury Ward)



London Borough of Merton  
Merton Civic Centre  
London Road  
Morden SM4 5DX

Tel: 020 8545 3424  
Mob: 07958 139 496

Email: [stephen.alambritis@merton.gov.uk](mailto:stephen.alambritis@merton.gov.uk)

Date: 22 July 2019

Sadiq Khan  
Mayor of London  
City Hall  
Queen's Walk  
SE1 2AA

**Re: Air Quality**

As Leader of Merton Council, I, along with my Cabinet, have prioritised improving the poor air quality across the borough in recent years. We adopted our ambitious Air Quality Action Plan in 2018, and its 70 actions are all now being delivered. This includes action to tackle motorists who idle their car engines, implementing car free streets in close proximity to schools, investing in electric vehicle charging across the borough and promoting car sharing clubs. For your information, I have appended our Air Quality Action Plan.

In addition, we are currently in the process of introducing a new approach to car parking and resident permit charges, designed to encourage motorists to travel more sustainably more actively, improving both air quality and promoting more active and healthier lifestyles. The new charging approach follows on from the introduction of a diesel levy in 2017, which we are in the process of reviewing to assess its effectiveness.

During consultation on the new charges we received a significant amount of feedback from both residents and businesses who wanted to see London's bus fleet cleaned up far more quickly than the 2041 date currently proposed in your Transport Strategy. Residents cited the positive example of TfL's approach to Putney High Street and the impact the removal of diesel buses has had on the environment there as evidence of what could be achieved in Merton.

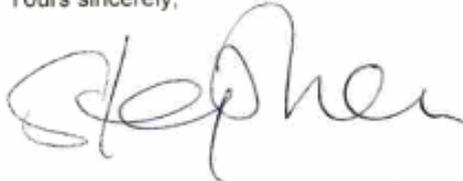
I know that my officers have raised this on several occasions with TfL but I would like to express my strong desire that the process of cleaning up of the bus fleet is accelerated right across Merton, but particularly in town centres and known Air Quality Focus Areas. With the introduction of the ULEZ there is a real concern that more polluting private vehicles and the older TfL bus fleet are now more likely to travel in outer London.

In addition, whilst we are encouraging residents to give up their cars we need to be more confident that there will be safe and accessible public transport options available. The lack of step free access at some of our busy train stations, particularly Raynes Park and Motspur Park, is a cause for concern, and any action you could take to expedite step action here would be appreciated.

TfL supported us in our unsuccessful bid earlier this year to the Department for Transport for Access for all monies and I would like to seek your support for future bids or alternate funds that we can sue to provide step free access to all public transport across the borough.

I look forward to hearing from you

Yours sincerely,

A handwritten signature in black ink that reads "Stephen". The signature is written in a cursive style with a large, looped 'S' at the beginning.

**Councillor Stephen Alambritis**  
**Leader of the Council**