

APPENDIX D

RESPONSE TO THE CALL IN REQUEST – EMISSIONS BASED PARKING CHARGES– A STRATEGIC APPROACH

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

We – the signatories – are in favour of air quality measures that will have a proven ability to reduce the levels of harmful emission in Merton.

This decision to move to an emissions based charging model for parking prices has not been an open decision informed by evidence, but one taken behind closed doors, without proper scrutiny, and without any consideration of the alternatives.

Response:

Merton Council places a high priority on protecting the health and well being of local communities by tackling the issues of poor air quality associated with vehicle emissions.

The Council acknowledges there is no one simple solution that will be effective in isolation in addressing these problems but that a comprehensive package of measures is required and will be used.

The decision to implement emissions based parking charges has been based on a range of research and evidence, including from the ULEZ scheme, that demonstrates that pricing mechanisms can be effective in influencing travel choices, as set out in more detail under section (a).

The proposals for emission based parking charges fulfils actions and policies set out in a number of Council strategies including Merton's [Transport Strategy \(LIP3\)](#), [Air Quality Action Plan](#), and the [Climate Strategy and Action Plan](#). All of these Strategies which incorporate actions in relation to emissions based parking charges, have involved public consultation and been subject to an open, democratic and thorough Committee process of scrutiny and approval.

Action 32 of the Air Quality Action Plan ([AQAP](#)) states that the Council would consider a review of parking and charges to help reduce combustion engine vehicle use and the consequent emissions. The Climate Change Strategy and Action Plan 2020 adopted by Council on 18th November also commits to consulting on emission-based parking charges to discourage the use of higher polluting vehicles by 20/21.

The proposal for emissions based parking charges itself has been subject to the following comprehensive timetable of open meetings and public consultation where appropriate scrutiny of the proposal has been carried out:

- Sustainable Communities Overview and Scrutiny Panel- 25th February 2020
- Cabinet- 23rd March 2020
- Public consultation -10th September to October 26th
- Sustainable Communities Overview and Scrutiny Panel- 8th December 2020
- Cabinet- 18th January 2021

We fully recognise the seriousness of the air pollution problem in Merton and would wish to see this urgently addressed. However the blunt instrument of raising the cost of parking in a small proportion of the borough is not backed up by sufficient evidence to allow us to support the proposals. The proposals also discriminate against residents of Wimbledon and Raynes Park which has less pollution than the problem areas in the borough in Mitcham and Morden.

The Council welcomes the recognition of the seriousness of the problem of poor air quality in the borough and the support for urgent action to tackle air pollution, which

is a legal duty that the Council must fulfil and is open to challenge and scrutiny on.

Air pollution particularly affects the most vulnerable in society including children, older people, and anyone with long-term health conditions. According to a recent study by [Imperial College London](#) up to 100 deaths per year in Merton are attributable to the harm caused by poor air quality.

A recent high profile case which records air pollution as a contributing factor to the death of a London child, Ella Kissi-Debrah, has added increased pressure on Local Authorities to ensure that they are taking all the actions possible to tackle this health emergency.

Refer to relevant responses under sections a, e and f below.

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

The decision to proceed with the emissions based charges increase in car parking costs and permit prices is disproportionate to the desired outcome. The claimed outcome that a reduction in emissions will occur as residents will switch away from private vehicles is not supported by credible evidence. If this was the case then the previous increase in parking charges would make this second increase unnecessary.

Response:

The report cited a range of research papers that set out evidence that parking price mechanisms are an effective tool in influencing travel choices.

A research paper by the Local Government, Association Decarbonising Transport: Climate Smart Parking Policies (October 2020), states that where there are good alternatives available to the car, intervening to raise parking costs can reduce car ownership and pricing structures can also be used to encourage less-polluting vehicles. As people take decisions about whether to own a car and what type of car to purchase, having a comprehensive and coherent parking management approach and pricing structure in place is essential.

Analysis of Merton parking permits recently undertaken, shows that approximately 45% of current permits are for vehicles that were not registered on the permit system a year ago. This high level of turnover in vehicles is most likely due to a combination of existing permit holders changing a vehicle and new residents moving into the borough and registering a vehicle for the first time. Both of these scenarios offer an opportunity to influence travel choices. In particular, moving to a new location when regular travel habits have not yet become established, is the time when people may be most likely to consider a change of travel behaviour to more sustainable modes, particularly if parking prices act as a disincentive to continued car ownership and good alternative travel options are available.

When existing permit holders change a vehicle, pricing signals such as the proposed parking charges may be particularly influential in vehicle choice, especially when reinforcing the pricing signals related to emission as set in the national VED and the ULEZ schemes. The Government is currently considering amendments to VED including an increase the costs for higher polluting vehicles, which further supports the arguments for using pricing to influence vehicle choice.

Evidence shows that households that have access to a vehicle make more trips by car (TfL Travel in London Report 12) which demonstrates the importance of reducing car ownership as a means to reduce overall levels of car use but also to encourage a shift to lower emissions models to reduce emissions where cars are essential.

A recent study "Reclaim the Kerb: The future of parking and kerbside management in London" (March 2020 Centre for London) recommended that London boroughs

should set residential parking permit charges at a level that helps achieve strategic modal shift objectives and should move towards a harmonised emission-based charging structure, alongside escalating charges for additional vehicles.

17 out of the 32 London Boroughs have also introduced some form of emission-based charging, although as these are mostly recent developments, there is limited data available on the outcomes of these schemes. Camden Council who have introduced 4 tariff charges based on CO2 emissions, including a diesel surcharge have, however, seen a decrease in permit sales of 6% from 2017 to 2018.

The Ultra Low Emission Zone (ULEZ) was implemented in central London in April 2019, and has seen the number of vehicles meeting the tough emission standards rise from 39% in February 2017 to more than 80%. It has also had a transformational impact on air pollution, contributing to a 44% reduction in roadside nitrogen dioxide within its boundaries.

Data on permits sales in Merton does indicate that the increased parking charges introduced in January 2020 were beginning to have a positive effect on transport choices. A significant reduction in permit sales was observed immediately after prices increased, with sales in February 2020 reduced by more than 300 compared to the same month in 2019. A further overall decline in the sale of permits has been observed throughout the remainder of 2020, although it is recognised that Covid-19 may have distorted the picture.

The previous parking charges were aimed primarily at discouraging car use in areas with good accessibility but did not offer a price differential to influence vehicle choice in relation to vehicular emissions. The effectiveness of a pricing mechanism on influencing behaviour depends on the level at which it is set. In relation to transport choices the cost of the alternatives must be taken into account when setting parking prices, including consideration of the often higher upfront costs of lower polluting vehicles.

The decision does not offer any practical solutions to deal with the pollution hot spots in Mitcham and Morden and nor does it offer support for low emission bus zones or other air quality mitigation measures that have been shown to work.

Response:

See section f below.

This policy as proposed is a blunt instrument which doesn't appear to necessarily to target the behaviour which is causing the borough's air pollution problems.

Response:

Rather than the blunt tool of a uniform increase in parking charges, the proposed charging model introduces differential rates to take account of the accessibility to alternative sustainable travel modes and the emissions of the vehicle. This is a fairer, more nuanced approach to parking charges that incorporates the polluter pays principle.

Under the proposals, an estimated 50% of existing residential annual permits either will be unaffected or will have a reduced permit cost. A further 18% of permits will be subject to a modest increase of only £60 per annum. The remaining third of permits will be subject to a significant increase of between £150 and £390 per year.

The policy therefore specifically targets the most polluting vehicles with the aim of either disincentivising ownership of these vehicles altogether or incentivising a switch to a lower polluting model. Vehicles most affected by the proposals will include older vehicles and larger vehicles such as Sports Utility Vehicles (SUVs) which tend to produce more emissions because they are heavier and less

aerodynamic, as well as taking up more parking space in CPZs. SUVs have been the [second largest cause of rising global carbon emissions](#) over the previous decade. However, worryingly their share of car sales in the UK has [tripled](#) over the past 10 years, indicating that people are still choosing these vehicles despite their greater emissions and an increased public understanding of the problems this causes.

It is considered that this price rise on the most polluting vehicles will be effective as part of a comprehensive package of measures and is considered proportionate and necessary in light of the urgency of the issues the proposal is seeking to address.

(c) respect for human rights and equalities;

The equalities analysis clearly states that this policy is detrimental to the elderly, those who are pregnant and those with a low socio-economic status.

Many of negatives of the emission based parking charges will be borne by elderly residents of Merton. Page 16 states “Any increase in parking charges has the potential to negatively impact on those who are older and are more likely to have physical and health conditions. Older people are more likely to be affected by social isolation and loneliness.”

This clearly shows that there is a greater risk of loneliness and social isolation as well as an impact on physical and health conditions. The Covid19 pandemic has had a similar effect on the lives of the elderly and by introducing the emission based parking charges Merton Council will be adding to these problems for some of the most vulnerable an isolated residents in Merton.

Pregnant women will also suffer if the emission based parking charges are implemented. Page 25 states “It has been identified that those within this group could potentially be negatively impacted by this as while we are trying to encourage greater use of public travel, there are still some stations that do not have step free access, and this can be difficult to access with a buggy or young children. In addition, those with larger families may be more dependent on a personal vehicle, and as a result of that, have to pay more for their parking.”

Page 34 states “Any increase in parking charges has the potential to negatively impact on those from certain socio economic backgrounds. Significant social inequalities exist within Merton. The eastern half has a younger, less affluent and more ethnically mixed population. The western half is less ethnically mixed, older and more affluent. Largely as a result, people in East Merton have worse health and shorter lives. In the parking charges review, it was identified that those in this group are more likely to live in areas where access to public transport is not as good as in other areas of the borough.”

The effects of raising the cost of parking permits will also have an additional negative impact on the elderly, and those who are pregnant as it will prevent family and friends from visiting these vulnerable groups when they are most in need.

At a time when many families are dealing with the economic consequences of the Covid 19 pandemic, increasing the burdens on young families and those on low incomes as a result of the emission based parking charges will add to the problems that so many have faced over the last ten months.

We also consider that the introduction of emissions based parking charges would breach the Public Sector Equality Duty and therefore also the council’s own Equalities Strategy, as the emission based parking charges clearly discriminate against vulnerable groups in Merton.

The Public Sector Equality Duty is a duty to have “due regard” to impacts on protected characteristics groups. The EA did identify some limited detrimental impacts for some groups based on age, socio-economic status and pregnancy and maternity. However, in light of the mitigation measures set out in the EA, the impact was assessed to be low and proportionate to the legitimate aim of the policy. Any negative impacts have to be balanced against the positive impacts that of the proposals in mitigating the disproportionate impacts of vehicle emissions on protected characteristic groups as further set out below. The Council believes that it has met the legal duty imposed by the Public Sector Equality Duty and will continue to seek ways to mitigate any negative impact.

A report just released by [Imperial College London](#)'s Environmental Research Group, found that the greatest number of deaths attributable to air pollution were in outer London boroughs and are mainly due to the higher proportion of elderly people in these areas, who are more vulnerable to the impacts of air pollution.

City Hall research shows that those exposed to the worst air pollution are more likely to be deprived Londoners and from Black, Asian and Minority Ethnic communities. There is also emerging evidence linking air pollution with an increased vulnerability to the most severe impacts of COVID-19.

According to a report by [Unicef](#) babies and young children are particularly vulnerable to the effects of air pollution which can lead to or exacerbate respiratory illnesses in developing lungs.

The EA identified that the proposals for emissions based charging for visitors may have a particularly detrimental impact on the elderly that may be more likely to suffer from both social isolation and digital exclusion. To mitigate this the proposals were amended to provide a concession to those residents living in a CPZ that are over 75 and are registered on the Council tax register as a single occupant and in receipt of Council Tax benefit. These residents will be entitled to 12 visitor permits/ scratchcards per year at 50% discount.

The EA did not identify any particular detrimental impact on pregnant women but some potential impact on parents with very young children reliant on buggies which may struggle to access stations that do not have step free access including Raynes Park. It should also be noted that a significant proportion of parents do not own a car with lone parents having particularly low levels of car ownership. TfL data shows that households with children on incomes deciles under £35k, are actually less likely to own a car than households without children. For parents that cannot realistically travel actively, the proposals do incentivise switching to lower emissions vehicles.

It was also identified that pregnant women and new parents may be more reliant on visitors, so be affected by the proposed visitor charges. However, it was not considered that this group would be particularly prone to digital exclusion so will not be dependent on purchasing scratchcards for visitors and therefore not subject to the associated higher price increases.

The EA identified that as the proposal will result in increased parking charges for those that own more polluting vehicles it has the potential to have a negative financial impact on some individuals with lower incomes, particularly those that may have cheaper vehicles that are older and more polluting. However, as the EA set out there are already equalities impacts associated with the costs of car ownership which means that lower income groups in outer London are already far less likely to own a car (TfL Travel in London 12). Only 30% of outer Londoners in the lowest income decile own a car compared to over 90% in the top income decile, so lower income groups will be less likely to be affected by the proposals. Across most of Merton it is observed that car ownership rates tend to be lower in the wards with a

higher proportion of residents in lower income deciles levels.

The EA also set out a range of mitigating measures for low income groups including frozen bus fares, discounts on public transport services and the TfL [scrappage grant](#) of £2k to London residents who are on certain benefits and have a car that does not comply with ULEZ standards. Within this price range, it is possible to purchase a range of second hand vehicles with low emissions that will attract either a decrease, no increase or only a modest increase in parking charge.

(d) a presumption in favour of openness;

This decision to introduce emission based parking charges has been taken and put to a consultation that will not have a bearing on the outcome of the decision.

1,600 responses were received during the consultation. As we can see from the responses to the questions below the council has paid no attention to the results of its own consultations, which showed that clear majorities opposed the principle of emissions based parking charges.

When asked if Merton Council should prioritise lower polluting vehicles by offering a lower parking charge over highly polluting vehicles 61% disagreed.

84% said that the proposals were unlikely to make them reduce the journeys made by car.

No consideration has been given to their responses which support scrapping the charges. The council has therefore not listened to the residents who have decided to engage with the consultation and has therefore displayed a close minded approach, and has shown that the decision has not been made through an open process of engagement.

The decision has been sent through the scrutiny process even though the decision has already been made in the Leader's Strategy Group and Cabinet in January. It is clear that the meetings of the Sustainable Communities Overview & Scrutiny Panel which was asked to look at this was also just for show for the council as no attempt was made by the council or the cabinet to listen to feedback from residents who spoke at the meeting and members of the panel.

Following the publication of the responses to the consultation, it is clear that the perception of residents is that this decision has been taken predominantly in order to generate revenue for the council.

Response:

A statutory consultation, as enshrined within existing legislation, is not a referendum and therefore the numbers of responses is not a key factor in itself. The Council is required to give consideration to the nature and content of representations but not necessarily the quantity. The 1600 responses received represented less than 1% of the population of the borough and are not necessarily fully representative of the population characteristic of the borough.

96% of respondents to the survey were car owners which is far higher than the 68% of Borough residents that own a vehicle. More than a quarter of respondents owned 2 cars or more, which again is higher than the borough average. This indicates that the consultation responses were skewed towards car owners and as they are more likely to be affected by the price increase, they may be more likely to give a negative response. Non-car owners that will only benefit from the positive outcomes of the proposals were under represented in the responses.

A majority of respondents agreed with the over-arching objectives of the proposal with two thirds agreeing with the statement that “Merton has a key role to play in tackling the challenges to Air Quality and Climate Change we are facing”. More than half 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”.

However, respondents were less likely to agree with statements that more specifically linked to these proposals, with only one quarter agreeing with the statement that “parking permit charges in Merton should be linked to CO2 and NOx emissions levels of the vehicle”. Only one third agreed that “Merton Council should prioritise lower polluting vehicles by offering a lower parking charge over highly polluting vehicles”. In comparison, in the consultation conducted on the parking charges implemented in January 2020, 57% of respondents agreed with the same statement, indicating that support for the principle reduces when it is linked to a firm proposal that may have direct financial implications.

Feedback from residents and members of the Sustainable Communities and Overview panel was taken into account and amendments to the scheme made in response, specifically in relation to the introduction of a concession on visitor permits for older more vulnerable residents.

(e) clarity of aims and desired outcomes

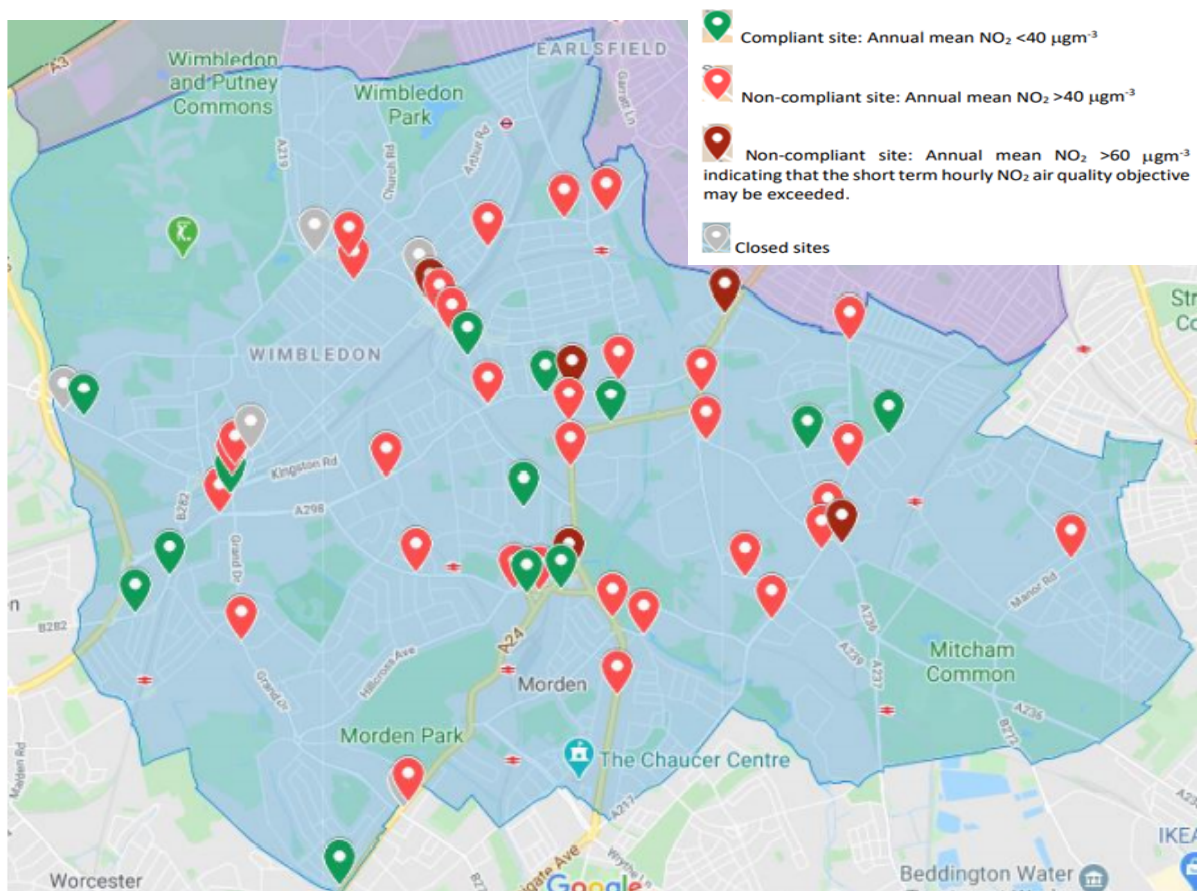
The Cabinet Member says that the increase is about improving public health and reducing air pollution across the whole of the borough. The report details pollution hot spots, of which there are a few locations in Wimbledon, however many of the serious levels of pollution are in Mitcham and Morden, these are outside of the scope of the increased charges, and therefore the rationale that air quality will be improved by residents shifting away from car usage will not occur in some of the worst affected areas of the borough.

We do not see how using a hike in parking charges will actually achieve the stated aim of improving air quality. The proposed tax takes no account of the through traffic from other boroughs, industrial users, buses, HGVs and taxis. Therefore it is hard to conclude how introducing emissions based parking charges will materially make a difference to air quality, and the report does not clearly make this link and is not backed up with credible evidence.

We do not see how increasing the cost of parking in Wimbledon and Raynes Park will achieve the aim of encouraging more people to walk in the borough, as the report deliberately misunderstands why people own cars in the first place. Little to no thought has been given in the report to realise that a large number of residents in Wimbledon and Raynes Park already walk a lot, and in non-pandemic times use public transport for commutes and local trips. What extra desired outcome is the council expecting in Raynes Park and Wimbledon. Levels of walking have been very high over the last year, as anyone would observe visiting any park in the borough.

We acknowledge that forcing people out of their cars leaves them with little choice but to use public transport, or walk or cycle. However, this will not be applied to large parts of Mitcham which are not in CPZ areas. The proposed charges will not help Mitcham health levels to improve which your own report has stated is far worse than Wimbledon.

The map below showing London Borough of Merton NO₂ concentrations for 2019, indicates that there are air pollution hotspots in all parts of the borough and that there is not a significant difference between the East and West of the borough.



It should be noted that some areas in pollution hotspots in the East of the borough are covered by CPZs so will be subject to the proposals, particularly in Colliers Wood and Graveney Wards.

It is recognised in the report that the Council only has the powers to apply the proposals to parking it controls and that it cannot apply this to all vehicles in the borough or to through traffic. Emission of air pollutants from vehicles are not restricted to the area the car is registered in as most vehicles will travel into the wider surrounding area. Therefore, the whole borough will benefit to some extent from an overall reduction in vehicular emissions. The proposal also aims to achieve an overall reduction in the borough's emissions of the carbon dioxide that contributes to climate change and these emissions are not area specific.

The air quality hotspots in Mitcham and Morden are mainly focused around the main traffic routes (including A24 and A216/7) that in addition to local traffic, carry large volumes of through traffic into and out of inner London. The expansion of the ULEZ zone into the neighbouring boroughs of Lambeth and Wandsworth in October 2021, will help to tackle the emissions of a proportion of the vehicles that travel through Merton on these routes. TfL will also be introducing tighter standards for heavy vehicles across the entire city and are continuing to roll out zero emission buses including converting route 200 to electric in Summer 2021. TfL have also recently announced that they will conduct further research into a proposal to charge motorists that enter Greater London, which may potentially reduce the amount of through traffic in Merton in the longer term.

The proposals for emissions based charging are part of a comprehensive package of measures that together aim to tackle poor air quality, as well as CO2 emissions and traffic congestion. Many of these measures apply equally to the whole of the borough and sustainable travel schemes have been implemented in parts of the borough not covered by CPZs, notably the recent major regeneration of Mitcham town centre.

TfL data (Travel in London Report 12) confirms that households without access to a car make a far lower proportion of trips by car and data from the last Census indicates a general trend that wards in the Mitcham area of the borough already tend to have lower rates of car ownership than in the West of the borough. For example over 40% of households in Cricket Green and Figge's Marsh Wards did not own a vehicle, compared to just 16% in Village, 27% in Wimbledon Park and 28% in Raynes Park.

There are no specific measures to define what reductions of emission are aimed for, what metrics on increased public transport use, and no indication of what metrics will be used to measure the increase in public health across the borough.

Response

The desired outcomes of the proposal as set out clearly in the report are to reduce car ownership and use and to encourage the uptake of lower polluting vehicles. The objectives are to:

- Reduce the CO2 emissions the contribute towards climate change
- Reduce the vehicular emissions of local air pollutants
- Reduce congestion
- Reduce parking pressure and dominance
- Improve public health outcomes through increased uptake of active travel modes
- Improve road safety outcomes

Detailed measurable transport targets as set out in the Council's transport strategy are shown on pages 40 and 41 of the Cabinet report, which includes targets for reductions in emissions of both CO2 and local air pollutants; vehicle ownership; mode share of sustainable modes and amount of active travel. This proposal is expected to contribute towards all of the targets shown as part of a wider package of transport measures which include schemes that are being implemented to support sustainable transport.

It appears to any casual reader of the report that the actual desired outcome is to achieve a budget gain to close a gap in the council's finances.

The revenue that will be received all just appears to go in the general funds of the E&R department to spend on whatever transport or environmental items it determines. The report should have set down precisely what anti-pollution measures would be implemented with this additional revenue, i.e. new tree planting, cycle and walking infrastructure improvements, pollution abatement outside key school sites etc.

Response:

Local authorities are not permitted to use parking charges as a means of raising income. Section 55 of the Road Traffic Regulation Act 1984 specifies what any surpluses from parking activities may be used for. Surpluses from parking activities are currently used to contribute towards the "freedom pass" concessionary travel scheme for Merton residents, and carriageway and footway maintenance. For example, in 2019/20 the audited Parking Account notionally contributed c£8.9m to concessionary fares, and c£1.2m to carriageway and footway maintenance.

The aims of introducing EBC include reducing congestion and improving air quality through changes in motorists' behaviour, and the current financial modelling reflects this. By Year 4 (2024/25), the associated revenue at the lower end of the range is currently only expected to be in the region of £300k, with further reductions possible beyond this. Therefore, it would be too early to agree to any measures that commit the Council to expenditure that cannot be funded in the medium to long term.

However, the report highlights examples of other measures that could be adopted once EBC has been implemented and officers have had an opportunity to analyse sufficient data on the effects on driver behaviour. The report also mentions that any surplus generated by these proposals may be reinvested directly into additional measures to mitigate the impact of the proposals and to support and incentivise sustainable travel choices, but these would need to be separately costed to ensure they can be funded in both the short and long term.

The report also proposes that the scheme be reviewed and reported to Cabinet no later than 24 months after implementation of the proposals, which could include proposals for further anti-pollution measures.

(f) consideration and evaluation of alternatives;

No significant thought or effort seems to have been given to alternatives. There are other areas the council could focus on to bring down high levels of air pollution, instead of placing an additional burden on some residents.

This appears to be a single-minded exercise to raise extra income with no specific alternative having been tested or considered.

The Sustainable Communities Overview and Scrutiny panel suggested and offered various ideas and suggestions to make the policy fit-for-purpose (and officers had asked for suggestions), but was summarily dismissed by the administration's own councillors and again by the cabinet.

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

Response:

Merton Council places a high priority on tackling the growing problems associated with increased car ownership and traffic volumes within the borough, so has considered all available alternative options to address this, as has been set out in previous reports.

The Council acknowledges there is no one simple solution that will be effective in isolation in achieving the objectives, but that a comprehensive package of measures is required and will be used. Merton's [Transport Strategy \(LIP3\)](#), [Air Quality Action Plan](#), and the [Climate Strategy and Action Plan](#) all set out a large number of measures that alongside emission based charging, will contribute towards achieving the outcomes of tackling air pollution, climate change emissions and traffic congestion.

Merton Council has already introduced and is continuing to deliver many of these measures including a range of sustainable transport infrastructure schemes such as pedestrian crossings and cycle routes and supporting measures such as cycle training and school travel plans. However, despite the recent investment and improvement to sustainable transport options in Merton, car use is continuing to rise and use of sustainable travel modes is showing a worrying falling trend.

Indeed, the Government report [Future of mobility](#), states that while soft incentives to promote sustainable travel can be effective, they are unlikely to lead to substantial change in travel behaviour unless they are accompanied by hard factors, such as pricing mechanisms.

Road pricing is often identified as the fairest and most effective pricing mechanism solution to influence transport choices and The Mayors Transport Strategy does commit to investigating further options for road pricing models (Proposal 21). However, it is not considered feasible for the Council to introduce a road pricing system unilaterally at this time as an alternative option and the Council cannot justify waiting to address transport problems.

According to the Local Government Association ([Decarbonising Transport: Climate Smart Parking Policies October 2020](#)) parking management is one of the few 'sticks' available to local authorities which can complement the 'carrots' of better active travel and public transport options. Without changes in how parking is managed, progress on travel behaviour change will likely be limited to well below the levels required to achieve transport objectives. In 2018 The GLA (London governing body for Air Quality) produced a list of measures that Local Authorities should take to tackle poor air quality and the use of parking policy to reduce pollution emissions is considered of 'High Benefit'.

The Council does not view the proposals as an alternative to other measures but as an essential part of comprehensive action plan that will seek to use all tools available. Indeed, the Council believes that the research evidence set out demonstrates that emissions based charging proposals will be vital in ensuring that our strategies are robust enough to be effective in achieving our the outcomes required to tackle vehicle emissions.

Rather than the blunt tool of raising parking charges to a uniform level, the proposed charging model introduces differential rates to take account of the accessibility to alternative sustainable travel modes and the emissions of the vehicle. This is considered to be a fairer and more effective approach to parking charges that incorporates the polluter pays principle.

The alternative option of scrapping the proposal is not considered acceptable because the Council is not prepared to ignore its responsibilities to address the urgent issues of poor air pollution and climate change.

The Council considers that the proposals are justified, proportionate and necessary and that there are no realistic alternatives available at the current time that will be as effective in achieving the Council's strategic objectives.

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