

Committee: Sustainable Communities Overview and Scrutiny Panel – 8 December 2020

Wards: All

Subject: Emissions based parking charges- a strategic approach

Lead officers:

Chris Lee, Director of Environment & Regeneration

Dagmar Zeuner, Director of Public Health-Merton

Lead members:

Cllr Martin Whelton Cabinet Member for Housing, Regeneration and the Climate Emergency

Cllr Rebecca Lanning Cabinet Member for Adult Social Care and Public Health

Contact officer:

Ben Stephens, Head of Parking Services

1. RECOMMENDATION

- 1.1. Members to note the outcome of consultation on the emissions based charging proposals and comment on the final proposals to be considered by Cabinet in January 2021 for implementation in April 2021 or as soon as practicable thereafter.

2. EXECUTIVE SUMMARY

- 2.1. In March 2020, Cabinet agreed to undertake a borough wide focussed consultation process to seek views on the proposed introduction of emissions based parking charges.
- 2.2. Section 3 of this report reiterates the transport challenges associated with high levels of car use which include; traffic congestion and parking dominance, road safety concerns; public health concerns associated with sedentary lifestyles and vehicular emissions that contribute to local air pollution and climate change. The national and regional transport policy framework sets out a strategic approach to addressing these issues through encouraging a shift away from car use towards more sustainable modes of travel and to lower polluting vehicles.
- 2.3. The Government have recently [announced](#) a range of policies and initiatives to significantly increase the uptake of electric vehicles (EVs) over the coming decade, as well as promoting cycling and walking. Future transport policy may also include consideration of schemes that more effectively tackle car use, such as road pricing at a national or London wide level. However, the Council cannot justify waiting to address local transport problems, particularly those caused by vehicular emissions.

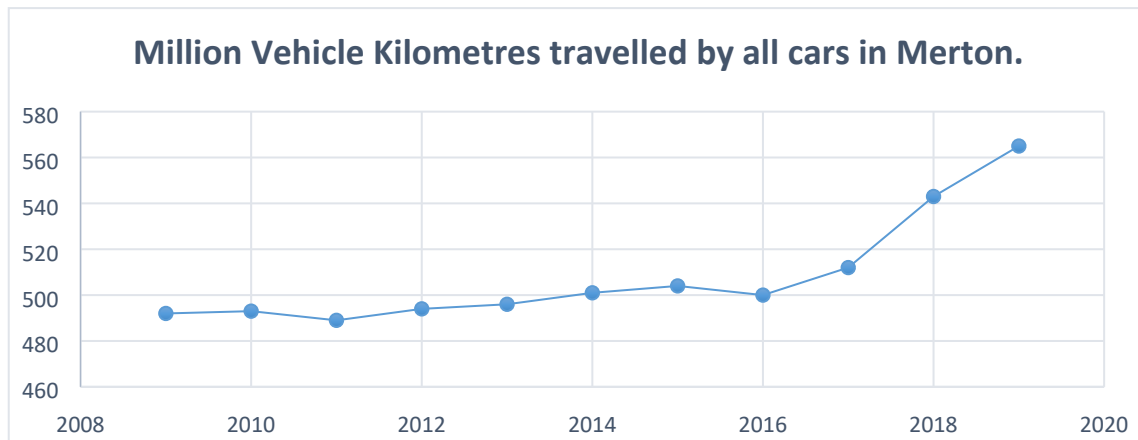
- 2.4. Parking management is one of the few tools currently available to local authorities which can complement measures to provide better active travel and public transport options. Parking prices can influence decisions about whether to own a car and what type of car to purchase (Local Government Association - Climate Smart Parking Policies). Without changes in how parking is managed, progress on mode shift away from cars to sustainable travel modes will likely be limited to well below the levels required to achieve transport, public health and climate change objectives, including reduced emissions.
- 2.5. Management of parking makes a vital contribution towards Merton's strategic objectives and policies as set out in our [Transport Strategy \(LIP3\)](#), [Health and Wellbeing Strategy](#), [Air Quality Action Plan](#), and the [Climate Strategy and Action Plan](#).
- 2.6. The proposals for emission based parking charges, as set out in Section 5, seek to further strengthen Merton's existing parking charge model introduced in January 2020, by introducing two additional elements that specifically target the emissions that contribute towards climate change and air pollution.
- 2.7. The proposals introduce different charging bands for CO2 emissions, which are based on the principles and categories of 'the Government Vehicle Excise Duty (VED) and increase charges as CO2 emission increase. To address local air pollutants, it is proposed replace the existing Diesel Levy surcharge that was introduced in 2017, with one that is based on the TfL Ultra Low Emission Zone (ULEZ) charging model, which uses Euro vehicle emissions standards.
- 2.8. The emission based charging model will be applied to most on street permit types including residential, teacher, business and trader permits. Emission based charging will also be applied to visitor parking permits. Pay and display parking on- street and in Council car parks will be subject to a surcharge for non ULEZ compliant vehicles. A full schedule of the proposed charges are set out in Appendix 7. The proposals will not apply to blue badge holder permits or carer permits so these permits will be unaffected by the proposals.
- 2.9. Under the proposals, an estimated quarter of existing residential permits either will be unaffected (approx. 15%) or have reduced permit costs (10%). A further 40% of permits will be subject to a modest increase of only £20- £60 per annum. The remaining third of permits will be subject to a significant increase of between £150 and £390 per year, which specifically targets the most polluting vehicles. Some newer diesel models will become exempt from paying the additional ULEZ surcharge of £150 although some older more polluting petrol vehicles may also become liable for this.
- 2.10. Section 6 of the report informs Members of the feedback received from the consultation exercise conducted between 10th September and 26th October 2020, to which approximately 1600 responses were received which equates to approximately 2% of car owners in 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 and indicates that the consultation responses were skewed towards car owners.

- 2.11. Whilst a majority of respondents agreed with the over-arching objectives and principles of the proposals to tackle air quality, climate change and encourage sustainable travel, three quarters disagreed with the specific proposal that parking permit charges should be linked to emissions levels of the vehicle.
- 2.12. A number of key themes emerged from the consultation that were raised by large number of respondents including that the charges were being introduced primarily to raise income for the Council and were too high and unaffordable. A significant amount of respondents also felt that they required a car for various reasons and that the proposals were unfair because they only targeted those that parked on street in CPZs. A large number of respondents also felt that the Council should incentivise sustainable travel choice rather than penalise motorists and raised concerns that electric vehicles were not a realistic alternative.
- 2.13. Following due consideration of the consultation responses, as set out in section 6, it has been demonstrated that the proposals are justified, proportionate and necessary in order to achieve the Council's objectives. In response to comments raised in the consultation, a number of additional measures and policies have been identified including measures to directly incentivise residents to surrender permits as well as measures to support sustainable travel such as secure cycle parking. Members are specifically asked to comment on the proposed suggestions as set out in section 7, before detailed proposals are developed for their application in Merton.
- 2.14. It is recognised that, whilst local parking management is one of the only tools currently available to the Council, it does not adequately target all car users across the borough. Achieving our objectives in the longer term will also be highly dependent on policies introduced by the Government and TfL such as pricing mechanisms and public transport improvements. It is also noted that the Government has recently conducted a call for evidence on VED, which may have implications for this proposal. The Council will therefore keep the proposed emissions based scheme under review in light of any relevant changes to national or regional policies or schemes, that either require amendments to the charging model (e.g. changes to VED) or are more effective at managing car use, so make the proposals redundant (e.g. road pricing).
- 2.15. However, at the current time it is considered that the emissions based charging proposals are the only realistic and effective option available to the Council to begin to urgently tackle transport problems in the borough and deliver our strategic objectives particularly on climate change and air pollution. It is therefore recommended that the proposals are approved for implementation in April 2021 or as soon as practicable thereafter.

3. TRANSPORT CHALLENGES

- 3.1. There are approximately 77,000 vehicles registered in Merton, with 68% of households owning at least one car or van. Like many outer London boroughs, the private car continues to take a leading role in meeting travel demand with around

43% of daily trips being made by car (LIP3). The traffic volume of cars in Merton has increased consistently over the last decade and risen more sharply since 2017 as shown in the chart below (source Department for Transport).



- 3.2. It is recognised that there are many benefits to the use of the car, such as convenience, comfort and journey reliability. In addition, the real costs of motoring have actually fallen slightly over the last decade (RAC Foundation) which often makes the car the easy, desirable and relatively cheap travel choice. However, this has led to the over reliance on car use which has a range of negative consequences.

Congestion and Road Safety

- 3.3. Cars require a large amount of space per person transported, so are a very inefficient use of road space. This results in high levels of congestion, which can delay emergency services, essential deliveries and public transport journeys as well as causing inconvenience for all road users.
- 3.4. Major roads that carry heavy and fast flows of traffic, act as physical barriers that can separate communities. Heavy traffic creates a noisy and unpleasant environment and can be intimidating and potentially dangerous for pedestrians and cyclists.

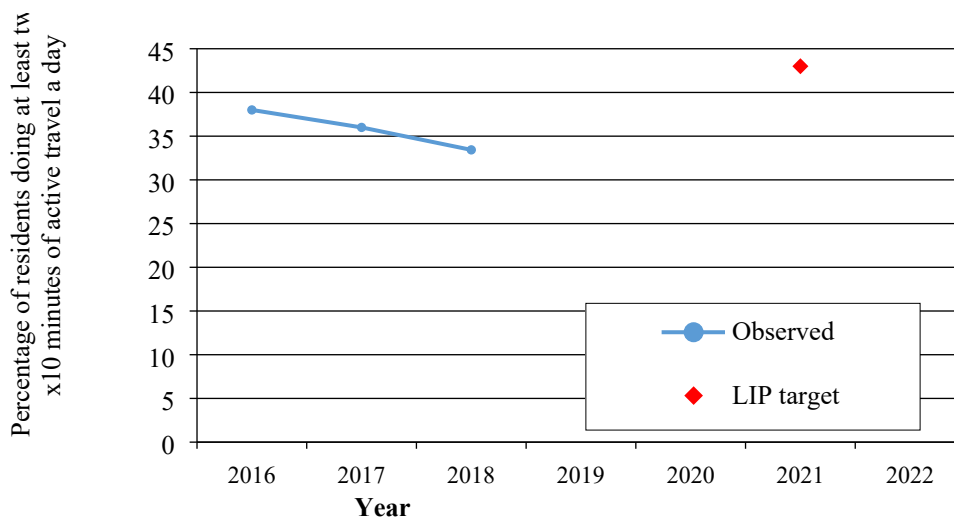
Parking Dominance

- 3.5. Cars also take up a lot of street space when not in use. The increased amount of cars owned in the borough has led to demand outstripping the limited supply of on-street parking space and resulted in many of the street environments in the Borough becoming dominated by parked cars. Where availability is reduced the local highway network can be considered to be at a point of 'parking stress' and this can lead to cruising to find a parking space which in itself contributes to local congestion and air pollution. In London, it is estimated that the average vehicle spends 8 minutes cruising for parking (British Parking Association, 2017).
- 3.6. The demand for parking can result in inconsiderate or even dangerous parking that reduces visibility and blocks crossing opportunities, which is most likely to affect vulnerable pedestrians including the elderly, the disabled and children. The demand for on-street parking also reduces the street space available for the

implementation of sustainable transport schemes such as wider footways, cycle lanes and secure cycle parking.

Public Health

3.7. The overdependence on cars even for relatively short trips ([Transport for London Walking Strategy 2018](#)) also corresponds with low levels of cycling and walking and this has a negative impact on health. Active travel, such as walking and cycling, is one of the easiest ways to exercise because it provides an opportunity to integrate regular activity into daily journeys. The level of active travel has 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 33 percent in 2015/16 to 2017/18 as shown in the chart below.



3.8. Most of the main causes of early death in London are linked to inactivity, including heart disease and cancer (Mayor’s Transport Strategy). Almost 60% of Merton adults are overweight and diabetes cases are increasing by about 2% per year. 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. If every Londoner walked or cycled for 20 minutes each day this would save the NHS £1.7 billion in treatment costs over 25 years.

3.9. COVID-19 has also had an impact on levels of physical activity with one [study](#) reporting that approximately 25% of UK adults living with chronic conditions reported less physical activity than pre-lockdown. Those living with health issues such as diabetes and cardiovascular disease, which can be exacerbated by inactivity, have been disproportionately affected by COVID-19. Nationally, Diabetes and hypertensive heart disease were included in 21.1% and 19.6% of COVID death certificates up from approximately 15% each in non-COVID deaths. Inactivity could have important long-term implications on those living with chronic diseases, increasing the possibility of suffering serious complications from COVID-19 or other health conditions in the future.

Air Pollution

- 3.10. Vehicular traffic is one of the major sources of the vehicular emissions that result in local air pollution including nitrogen dioxide (NO₂) and Particulate matter (PM). These pollutants are recognised as a major contributor to poor health and associated with a range of cardiovascular, respiratory health and cognitive conditions.
- 3.11. Air pollution particularly affects the most vulnerable in society including children, older people, and anyone with long-term health conditions. 6.5% of mortality in Merton is attributable to the harm caused by poor air quality, equivalent to around 75 deaths every year. The impacts of air quality on respiratory health and other associated conditions has also had important implications during the COVID-19 pandemic with 35% of UK COVID deaths occurring in those with a pre-existing respiratory or cardiovascular medical condition.
- 3.12. Air pollution concentrations in Merton continue to breach the legally binding air quality limits for both NO₂ and PM₁₀. In Merton, transport emissions account for approximately 60% of emissions of NO₂. Air pollution is particularly bad in proximity to busy traffic routes including in the town centres of Morden, Mitcham, Wimbledon and Raynes Park.
- 3.13. A recent [study](#) found that the health and social costs of air pollution from roads are £1,173 per person per year in London, which are higher than any other city in Europe. Researchers concluded that PM is responsible for the vast majority of the social costs (82.5% on average), compared with NO₂ (15%) and Ozone (2.5%).
- 3.14. Merton has an Air Quality Action Plan that is ambitious in its aims and demonstrates that we as an authority will use all of the powers available to tackle toxic air in the borough. Action 32 of Merton's Air Quality Action Plan 2018 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.

Climate Change

- 3.15. Transport is a major producer of the greenhouse gas emissions that contribute towards climate change. Cars produce more carbon dioxide emissions (CO₂) than all other modes of transport put together. The use of petrol and diesel vehicles in the borough makes up 19% of Merton's CO₂ emissions as a result of the 600 million kilometres driven in Merton each year.
- 3.16. The latest evidence from the intergovernmental panel on climate change (IPCC) and the Committee on Climate Change suggests that deeper and faster cuts in carbon dioxide (CO₂) are needed to avoid irreversible damaging effects of climate change than previously thought.
- 3.17. In July 2019, Merton agreed to work towards net-zero carbon emissions from the borough by 2050 and have developed a [Climate Strategy and Action Plan](#) which was approved by the Council in November 2020.

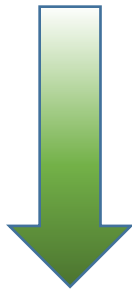
Covid-19 Transport Impacts

- 3.18. The Covid-19 crisis developed just after Cabinet approval of the consultation on emissions based parking charges in March 2020 and has since had a significant impact on work and travel patterns as well as the availability and capacity of public transport.
- 3.19. The initial complete lockdown resulted in a reduction in travel by all modes and a dramatic fall in car use. As the roads became quieter, the levels of cycling and walking increased. Provisional air quality monitoring data indicated a significant improvement in air quality across the borough during the full lockdown period, with levels at most sites reducing to within legal limits. An early [study](#) estimated that across the UK, 1,752 premature deaths attributable to air pollutant exposure were avoided during the 1st month of lockdown alone.
- 3.20. However, this dramatic decline in car use was only temporary and as the lockdown has eased, car use and congestion have increased again and it has been [reported](#) to exceed pre Covid levels in outer London. The associated rise in air pollutants recorded is particularly concerning in light of emerging [reports](#) that high levels of local air pollutants can worsen the health impacts of Covid 19. 35% of UK COVID deaths occur in those with a pre-existing respiratory or cardiovascular medical condition.
- 3.21. Covid 19 has presented an opportunity to embed some dramatic changes to travel behaviour and has demonstrated that when car journeys are reduced the improvements achieved can be significant. However, the crisis also presents a threat to our transport objectives with the potential for an increase in car journeys as people reduce their use of public transport.
- 3.22. This has reinforced the need to act robustly and quickly to ensure that any changes to transport behaviour as a result of Covid do not further contribute to the transport challenges we face. Whilst public transport has been adversely affected during the pandemic this is not expected to be a permanent change and we expect public transport use to return to pre Covid levels over time during 2021.

4. THE STRATEGIC TRANSPORT ROLE OF PARKING MANAGEMENT

Strategic Transport Policy Framework

- 4.1. There is now a growing consensus in transport policy that the only realistic way to tackle the challenges of congestion, air pollution, carbon emissions, and parking dominance is to manage and ultimately reduce car use.
- 4.2. The travel demand management approach advocates the implementation of a comprehensive package of measures that offer better sustainable travel options (carrots) alongside measures to disincentivise car use (sticks). The objective of the travel demand management approach is to achieve the following hierarchy of outcomes:



1st Reducing the need to travel:

remote working, local facilities and services

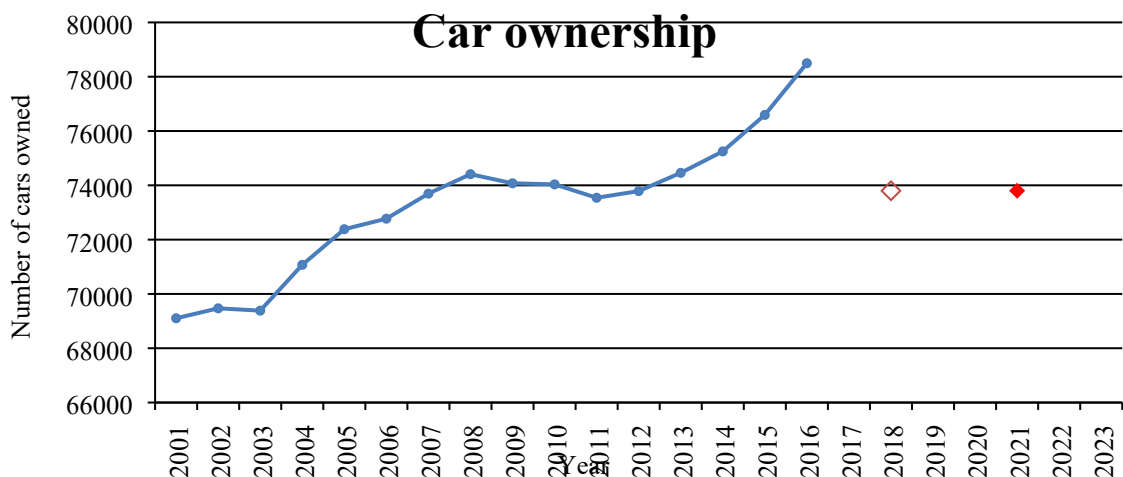
2nd Mode shift:

from car to sustainable modes such as walking, cycling, public transport.

3rd Reduce vehicle emissions:

through shared car use models such as car clubs and adoption of ultra-low emission vehicles (ULEVs).

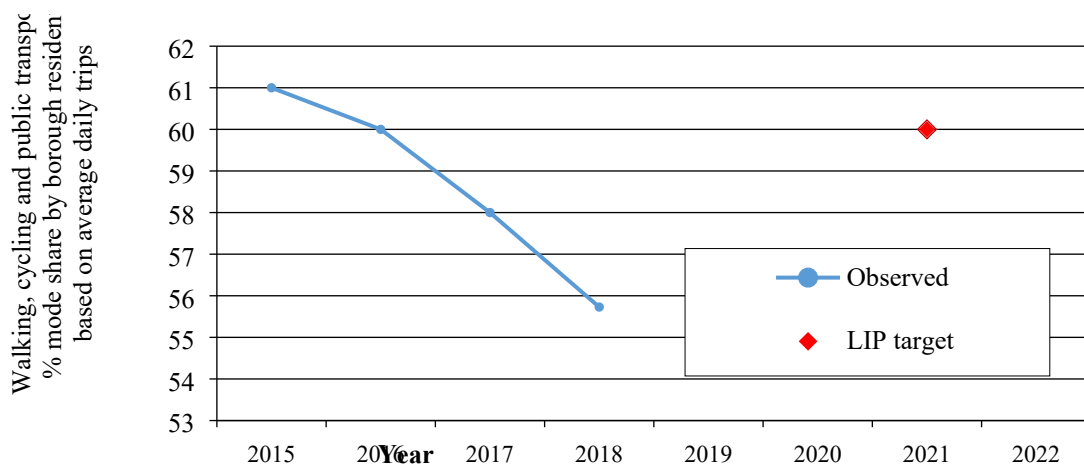
- 4.3. The Government’s strategic approach to transport is set out in a number of policy documents. The Department for Transport have recently released “[Gear Change](#) – a bold vision for walking and cycling” and have recently conducted a consultation on proposals to amend the [Highway Code](#) to include a road user’s hierarchy that prioritises pedestrians, cyclists and public transport over car users.
- 4.4. The government’s policies on ULEVs are set out in [The Road to Zero \(2018\)](#) and its ambition is that by 2030 between 50% and 70% of new car sales will be zero emission. To this end, the government are in the process of consultation on reforming the [Vehicle Excise Duty \(VED\)](#) and have announced that they will bring forward the phase-out date for the sale of new petrol and diesel cars and vans from 2040 to [2030](#).
- 4.5. The [Mayors Transport Strategy](#) sets the regional transport policy framework for London and the Council’s Transport Strategy (Local Implementation Plan 3) has been developed to align with and contribute towards to the delivery of the Mayor’s Transport Objectives. Some of the relevant transport targets that have been set specifically for Merton are shown in the chart below including for vehicle ownership and CO2 emissions from transport. These also show observed data over recent years, which demonstrates the scale of the transport challenges Merton needs to address to meet the targets.



- 4.6. Merton’s Transport strategy also contributes towards to delivering the key policies set out in Merton’s Health and Wellbeing Strategy, Air Quality Action Plan the Climate Change Strategy and Action Plan.

Achieving a Shift to Sustainable Travel

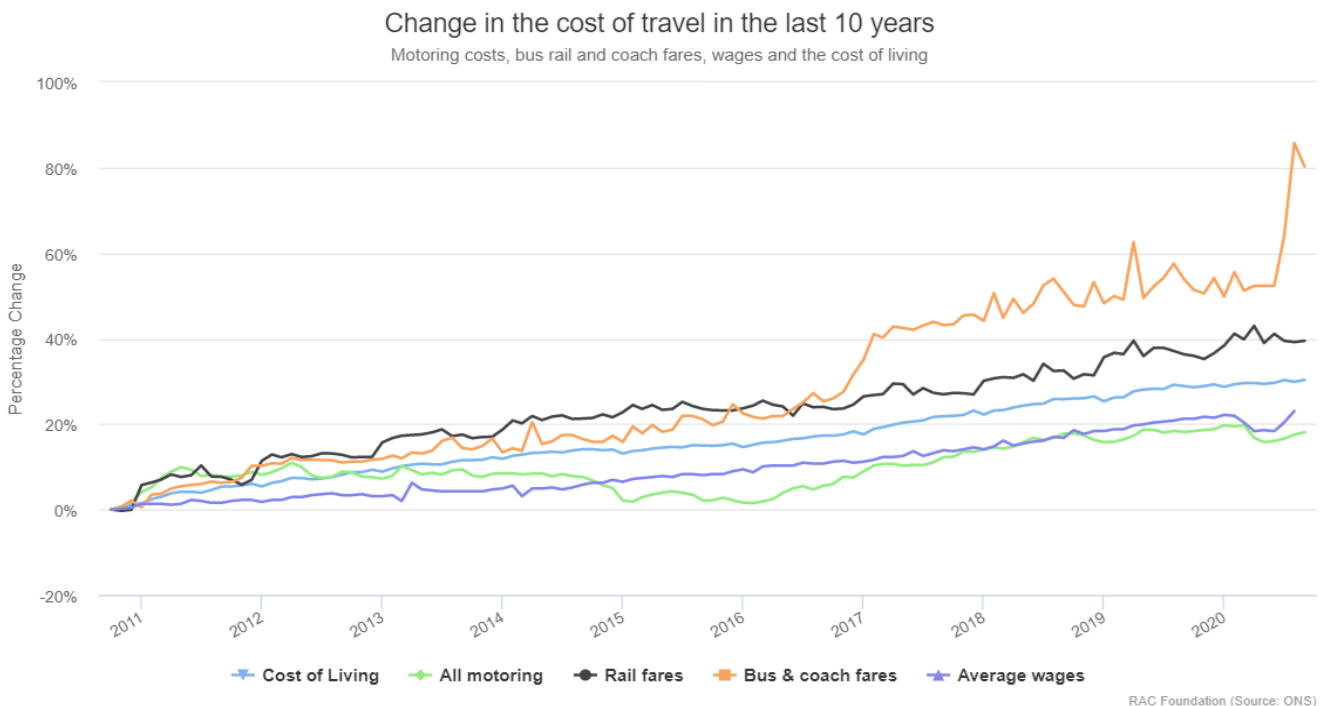
- 4.7. The [Future of Mobility](#) published by the Government Office for Science (2019) set out a range of transport tools that can be used to influence travel choices. “Soft” measures include; providing travel information and awareness campaigns; policies on flexible working; and practical support such as cycle training and workplace cycling facilities. “Hard” measures include major sustainable transport infrastructure and service improvements but also include pricing mechanisms. The report states that to influence behaviour change away from car use a combination of both hard and soft measures are required.
- 4.8. Merton’s Transport Strategy (LIP 3) sets out a range of policies that the Council will implement in conjunction with TfL to support sustainable transport choices. In recent years, Merton Council has spent well over £1 million per annum on delivering sustainable transport initiatives including infrastructure schemes such as pedestrian crossings and cycle routes and supporting measures such as cycle training and school travel plans. Schemes successfully delivered include; the borough wide 20mph speed limit, the Raynes Park to New Malden cycle and pedestrian link, a number of bus priority schemes and major regeneration of Mitcham Town Centre.
- 4.9. Merton benefits from good access to public transport, with the borough served by 10 mainline rail stations, London Underground services, tram link and a network of 28 bus routes. The Council has also facilitated a network of car clubs and provided on- street Electric Vehicle charging points.
- 4.10. However, despite the recent investment and improvement to sustainable transport options in Merton, the sustainable travel modal share (comprised of walking, cycling and public transport) is showing a worrying falling trend compared to previous years (56% down from 61%) and is just below the London average of 62.1% (source TfL).



- 4.11. To understand why fewer people are using sustainable travel options it’s useful to consider the many factors that influence individual travel choices. These include practical consideration such as geography and family or work requirements, as well as social attitudes to some travel modes. However, financial costs are an

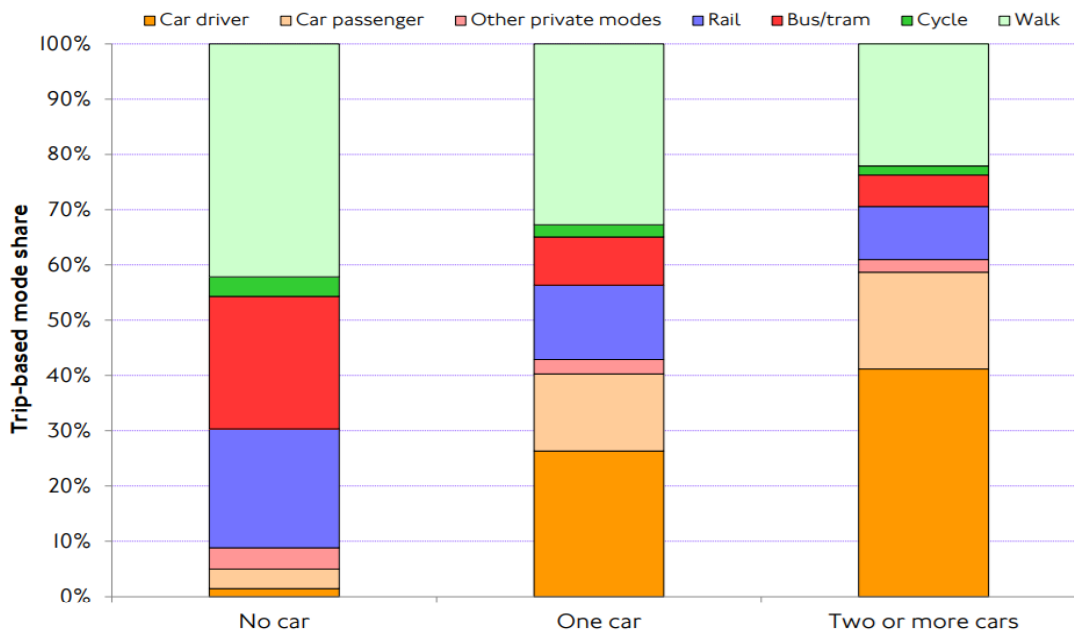
important factor in mobility decisions and travellers are often concerned about how to reduce these costs (The Future of Mobility Government Office for Science 2019).

- 4.12. According to data from the RAC foundation as shown in the graph below, the costs of motoring (shown in green) over the last decade have tracked below both the cost of living (light blue line) and average wages (dark blue line). By comparison, costs for public transport (shown as orange line) have increased significantly, although this is national data and in London the picture is more nuanced as bus fares at least have been frozen whilst cost for mainline rail services have risen significantly.



- 4.13. The relative fall in the price of motoring is due to a combination of market forces but also national and local policy decisions in relation to motorist taxes and parking charges. This has effectively subsidised car use particularly in comparison with public transport costs, which have increased significantly over the same period.
- 4.14. It is likely that pricing is one factor that has had an influence on travel choices and has acted to effectively incentivise car ownership. Evidence shows that once people have invested in the fixed costs of owning a car, they are more inclined to use it as demonstrated in the chart below (TfL Travel in London Report 12). This demonstrates the importance of reducing car ownership as a means to reduce overall levels of car use.

Figure 4.13 Trip-based mode share by household car access, LTDS 2016/17.



Source: Strategic Analysis, TfL City Planning.

Approach to Parking Management and Pricing

- 4.15. The Government [Future of mobility](#) report 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.
- 4.16. There is ongoing debate about the best pricing mechanisms to use to reflect the full costs of car use to society and to disincentivise car use. Road pricing is often identified as the fairest solution in the long term and its effectiveness as a measure has been demonstrated by the implementation of the Congestion Charge and ULEZ. The Mayors Transport Strategy commits to investigating further options for road pricing models (Proposal 21) for the whole of London but this is not likely to happen in the near future. It is not considered feasible for the Council to introduce a road pricing system unilaterally but the Council cannot justify waiting to address transport problems, particularly those caused by vehicular emissions.
- 4.17. 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 mode shift will likely be limited to well below the levels required to achieve transport objectives.
- 4.18. The effectiveness of parking demand management measures in London were established/ demonstrated in a comprehensive 2018 policy report by London Councils [‘Benefits of Parking Management in London’](#).

- 4.19. The price and availability of parking is one of the most important determinants of car use (SPUR Transportation Committee et al., 2004) so control of the supply and price of parking can be used to manage transport demand and make a direct impact on traffic levels. The availability of parking spaces, alongside parking charges influences choices about whether to drive, or even whether to own a car in the first place (Marsden, 2014).
- 4.20. 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. 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 ([Decarbonising Transport: Climate Smart Parking Policies October 2020](#)).
- 4.21. A recent study "[Reclaim the Kerb: The future of parking and kerbside management in London](#)" (March 2020 Centre for London) set out a number of key recommendations including
- “London boroughs should set residential parking permit charges at a level that helps achieve strategic modal shift objectives and fully covers the total operating costs of residential parking. All boroughs should move towards a harmonised emission-based charging structure, alongside escalating charges for additional vehicles”*
- 4.22. Car use results in significant costs to society that are not passed on to drivers. For example, the costs of air pollution alone in London are £1,173 per person per year. An RAC Foundation report on air quality and road transport (2014) argues that the costs of these externalities must be internalised into the prices people pay, a process sometimes known as the ‘polluter pays’ principle.
- 4.23. Pricing levels are likely to be key to influencing decisions and prices should be set with consideration to any cost comparisons with alternative modes of travel including public transport, car club use and lower emissions vehicles.

Parking Management in Merton

- 4.24. The Council has already employed a parking management approach for some years. This has included introducing a number of Controlled Parking Zones (CPZs) in response to requests from residents to control parking in their areas. CPZs in the Borough tend to be located in areas where there is an external demand for parking, particularly town centres and public transport hubs. Standard parking prices for most permits in CPZs had remained unchanged since 2010 and were fairly low until a review was implemented in 2019/20.
- 4.25. The number of residential permits issued for CPZs since 2016/2017 is shown in the table below. As can be seen the total number of permits issued, initially showed an upward trend which may be partly due to new CPZs being introduced. However, in 2019/20 there was a decline in permits issued particularly for diesel vehicles.

Year	Petrol	Diesel	Electric	Total Permits
2016/2017				17541
2017/2018	13,345	5,578	23	18,946
2018/2019	14,332	5,990	51	20,373
2019/2020	14,107	5,025	112	19,244

- 4.26. In April 2017, Merton took the innovative and bold decision to implement a diesel levy to encourage drivers/owners to move away from diesel vehicles. Diesel vehicle ownership as a percentage of permits sold has reduced slightly in nearly all permit zones since the introduction of the diesel levy in April 2017. This is believed to be mainly a result of national and regional policy signals on diesel cars including the London ULEZ zone but the Merton diesel levy may have had an effect in further amplifying this pricing signal.
- 4.27. Permit holders that had changed their vehicles from diesel to petrol were contacted to establish the reason for their change. Customers gave a range of reasons such as, environmental concerns and change in work arrangements. However, price was one of the top reasons cited, particularly in relation to the proposed expansion of ULEZ, which highlights that pricing signals can influence decision making.
- 4.28. In January 2020, Merton introduced a new parking charging structure and increased prices with the aim to influence motorists away from car ownership and use. The pricing structure introduced the principle of differentiating charges by location depending on ease of access to public transport, parking demand and duration of CPZ enforcement.
- 4.29. This scheme involved relatively moderate price increases, and the permit prices remains low in comparison to costs for other transport modes. For example, an annual bus and tram pass costs £848 and a train season ticket costs considerably more.
- 4.30. Provisional data on permits sales in 2020, indicates a further overall decline in the sale of permits, although it is recognised that Covid-19 may have had an impact. In particular, a significant decrease in permit sales of over 300 permits was observed in February 2020 compared to the same month in 2019. This was immediately after prices were increased in January, but before the lockdowns were imposed. However, data also shows that there were an increase in parking permit sales in September and October when the lockdown was lifted, indicating a worrying trend towards car use as an alternative to public transport.

Justification for introduction of emissions based parking charges

- 4.31. In March 2020, Cabinet approved proposals for the introduction of emissions based parking charges. The proposals build on the existing pricing structure and strengthen it to specifically target the emissions that contribute towards air pollution and climate change.
- 4.32. These proposals fulfil actions and policies set out in Merton Council strategies. In particular, the Climate Change Strategy and Action Plan 2020 adopted by Council on 18th November commits to consulting on emission-based parking charges to

discourage the use of higher polluting vehicles by 20/21. 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.

- 4.33. It is considered necessary and justified that charges are set at a level that influences choices about whether to own a vehicle and the type of vehicle to own. Parking charge increases were implemented recently in January 2020 but are still relatively low at a maximum of only £150 per year. This increase was an important step, particularly following a long period of parking prices being frozen since 2010. However, despite this recent increase it is not considered that the maximum amount is high enough to adequately influence travel choices. The current charges are lower than public transport costs and are considerably lower than the maximum charges for residential permits in some other London boroughs.
- 4.34. The proposed scheme builds on the existing parking charge model to add an element to financially incentivise residents to consider switching to a lower emitting vehicle. At a national level the Vehicle Excise Duty (VED) establishes the principle of setting pricing differentials based on emissions to encourage uptake of lower emissions vehicles. Merton's proposals are based on and further reinforce the pricing frameworks set by VED as well the London ultra-low emission zone scheme (ULEZ).
- 4.35. 17 out of the 32 London Boroughs have now introduced some form of emission-based charging using a range of charging structures some of which are shown in Table 1 on page 18. 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.
- 4.36. A number of the responses received to the consultation on the previous parking charges scheme, stated that they felt that parking charges would be fairer if they were based on a polluter pays principle and linked to emissions. More than half agreed that Merton Council should prioritise lower polluting vehicles by offering a lower parking charge over higher polluting vehicles. The introduction of the RingGo parking payment system in early 2020 has provided the technology which now makes it feasible for the Council to introduce emissions based charging scheme.
- 4.37. Under the proposals, an estimated quarter of existing vehicles will either be unaffected (approx. 15%) or have reduced permit costs (10%). A further 40% of permits will be subject to a modest increase of only £20- £60 per annum. The remaining third of permits will be subject to a significant increase of between £150 and £390 per year. It is considered that these higher charges for the higher polluting vehicles in particular will further strengthen the approach of using pricing to disincentivise car ownership, and may particularly have an influence on the ownership of older second vehicles.
- 4.38. For residents that do choose to give up a vehicle, car clubs provide a reasonable alternative to individual ownership by allowing members to use a car on a pay as you go basis for occasional trips without having the cost or hassle of owning the

vehicle. Survey data ([CoMo 2019](#)) indicates that car club members reduce their private car use and slightly increase walking and cycling trips. 41% members said they would have bought a new car had they not joined a car club and the average decrease in annual household car mileage was 286 miles. There is a network of approximately 60 car club vehicles in Merton, mainly located in CPZ areas. Ride hailing applications such as Uber are also becoming an increasing popular option for occasional car use in urban areas.

- 4.39. It is recognised that not all residents will be able to give up a car completely so the proposed scheme adds an element to financially incentivise them to consider switching to a lower emitting vehicle. Although it is acknowledged that residents are unlikely to change their vehicle overnight as a direct result of these proposals, parking charges may form part of the financial considerations when replacing their vehicles.

Electric Vehicles (EVs)

- 4.40. The Government are progressing a strategy to significantly increase the uptake of ULEVs and in particular electric vehicles (EVs) over the coming decades. Following extensive consultation with car manufacturers and sellers, the Government confirmed in [November 2020](#) that the UK will end the sale of new petrol and diesel cars and vans by 2030, ten years earlier than planned. To support this acceleration, the Government has pledged significant investment to accelerate the rollout of charge points for electric vehicles in homes, streets and on motorways across England, so people can more easily and conveniently charge their cars.
- 4.41. The Government has also pledged grants for those buying zero or ultra-low emission vehicles to make them cheaper to buy and incentivise more people to make the transition. EVs have a significantly higher initial purchase cost at the current time although they are projected to achieve cost parity by 2024. In the meantime, when other savings in fuel costs, taxes and other charges are taken into account, then EVs become more financially competitive. It should also be noted that 9 out of 10 newly purchased vehicles are purchased through pay monthly finance schemes, which makes the upfront vehicle cost less of a barrier and associated costs such as tax and parking more relevant to monthly cost calculations. The Government also introduced changes to tax rules in April 2021 that enable EVs to be purchased with tax savings through a workplace salary sacrifice scheme, which some residents may be eligible for through their employer.
- 4.42. The Council's proposals retain the price of permit for an EV at only £20, which provides a significant annual saving for EVs on parking costs. The aim of this aspect of the proposals is to enhance the Government initiatives to provide additional financial incentives for residents to consider investing in purchasing an EV when they make their next vehicle choice.
- 4.43. Merton already has the seventh highest proportion of ULEVs of all London boroughs with around 1000 vehicles registered (approximately 1.2% of the total number of vehicles). However, only 11% of these (112) are registered to

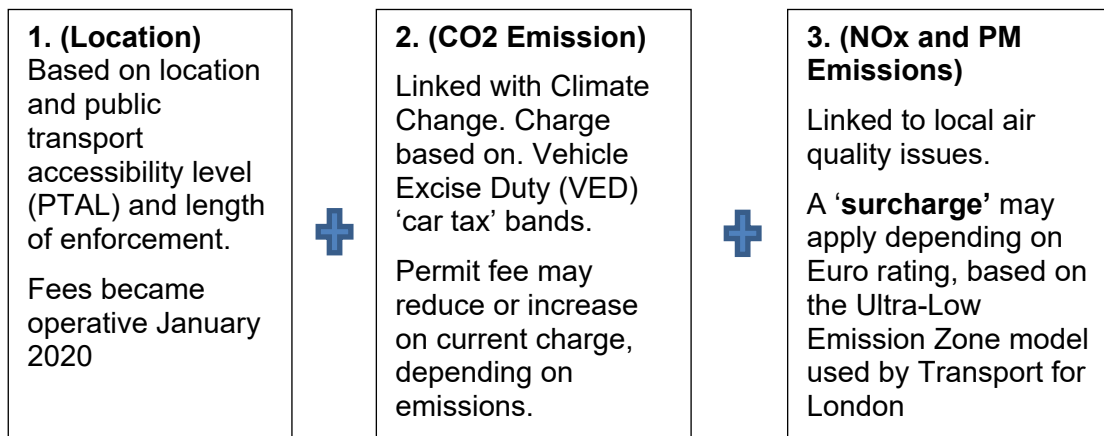
addresses in CPZs which is probably an indication of the difficulties associated with charging EVs in CPZs without a private driveway and access to the residents own domestic electricity supply.

- 4.44. To address this and unlock further potential for EVs the Council is introducing a scheme to install 80 EV charge points in lamp columns in CPZs by April 2021. This will add to the over 100 publicly accessible electric charge points operated by Source London (7kw) and 5 rapid charge stations (50kw) on the TfL road network. Based on current infrastructure and chargers in the pipe line Merton is expect to have around 230 chargers by April 2021.
- 4.45. In November 2020 The International Council on Clean Transport (ICCT) released research to assess the likely demand for EV charge points in London boroughs up to 2035. It estimates that the total number of EVs in London will increase by a factor of at least 5 by 2025 and by 30 times by 2035. The report projects that to meet demand from the growth in EVs Merton will require 686 public slow to fast chargers by 2025 and 1075 by 2030. Merton will also require 48 public rapid chargers by 2025 and 76 by 2030. Based on these projections in the report the council would need to deliver 100 new charge point every year up to and including 2025 to meet demand.

5. EMISSIONS BASED PARKING CHARGES PROPOSALS

- 5.1. The proposal retains key elements of the existing parking charge model introduced in January 2020, which is based on accessibility to public transport and length of time a controlled parking zone is enforced. The proposal builds on and strengthens this model by introducing two additional elements that specifically target the emissions that contribute towards climate change and air pollution.
- 5.2. The proposals introduce different charging bands for CO2 emissions, which are based on the principles and categories of 'the Government Vehicle Excise Duty (VED). 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.
- 5.3. As part of Merton's continued commitment to addressing local pollution it is proposed to replace the existing Diesel Levy surcharge that was introduced in 2017 with one that is based on the TfL ULEZ zone-charging model. Many Merton residents may be affected by the proposed ULEZ extension in October 2021, if they need to travel into this area, so aligning our charges with the TfL model will reinforce and simplify the vehicular requirements residents will need to meet to avoid both charges.
- 5.4. The ULEZ model is based on Euro vehicle emissions standards that set limits for air polluting nitrogen oxides (NOx) and particulate matter (PM) from engines. This is considered to be a fairer model than the previous blanket surcharge for all

diesels and some newer, cleaner diesels will be excluded from the charge whilst some older, dirtier petrol vehicles are now included. It is proposed that the same annual rate of £150 will apply. The diagram below shows the principles applied for new Permit charges.



- 5.5. It is noted that the Government is currently in the process of developing a call for evidence on VED with a view to amending the current charging system. Merton's proposals stand alone and are not dependent on any revised Government scheme. However, it may be prudent for the Council to ensure that the scheme remains aligned with any changes to the Government scheme. It is therefore recommended that approval be given for the Director of Environment and Regeneration, in consultation with the Cabinet Member for Regeneration, Housing and Transport, to keep the emerging changes under review and to make any future minor alterations to the scheme in response to any changes made to VED and ULEZ schemes to ensure continued alignment.
- 5.6. Table 1 on the following page shows the details of the Merton's proposed charges for residential permits. The existing charges are highlighted in green. As can be seen, for vehicles in band (G approximately 17%) charges will stay the same as existing and all vehicles with lower emissions (11%) will actually have a reduction on the current price. A further 40% of current permits in bands H or I will be subject to a modest increase of only £20- £60 per annum. But owners of higher polluting vehicles (approximately one third) will be subject to a significant increase of between £150 and £390 per year.
- 5.7. The table also contains some benchmarking data against other London boroughs that have introduced parking charges based on emissions. Under the proposals the charges between bands G and I, which will affect the majority of residents, are similar to a number of other boroughs and some charges for the least polluting vehicles are lower. The very highest charge level in Merton that aims to tackle the most polluting vehicles will be higher than other London boroughs current charges. However, other boroughs' charges may be subject to further amendment. For example, Camden Council is currently consulting on an increase to their diesel surcharge, which could result in a highest charge for the most polluting vehicles that exceeds Merton's proposed charges.

Table 1: Mertons proposed parking charges benchmarked against other London boroughs' with emissions based charges

		Merton Emissions based charges proposed									Camden	Islington	Lambeth	Croydon	Haringey	Brent	Sutton			
Band	CO2 g/kg	T1 L	T1 M	T1 S	T2 L	T2 M	T2 S	T3 L	T3 M	T3 S										
A	0	£20	20	20	20	20	20	20	20	20	£130.28	Free	£37.29	£6.50	£21	£25	Free			
B	1-50	£100	70	60	80	60	50	40	30	25		£20		£131.03			£65.00	£31	£40	£40
C	51-75	£110	80	70	90	70	60	50	40	30										
D	76-90	£120	90	80	100	80	70	60	50	40		£22	£131.03	£104	£41	£92	£55			
E	91-100	£130	100	90	110	90	80	70	60	50										
F	101-110	£140	110	100	120	100	90	80	70	60		£31.60	167.25	£146	£200	£245	£80			
G	111-130	£150	120	110	130	110	100	90	80	70	£84.20	£146						£227	£245	£110
H	131-150	£170	140	130	150	130	120	110	100	90	£102.80									
I	151-170	£210	180	170	190	170	160	150	140	130	£110.60	£221.87	£196.01	£146	£245	£110				
J	171-190	£300	270	260	280	260	250	240	230	220	£137.90						£291.26	£262.07	£146	£245
K	191-225	£370	340	330	350	330	320	310	300	290	£158.00	£291.26	£262.07	£146	£245	£110				
L	226-255	£450	420	410	430	410	400	390	380	370	£184.90						£475.00	£318.53	£300	£269
M	over 255	£540	510	500	520	500	490	480	470	460	£234.50	£475.00	£318.53	£300	£289	£110				
DIESEL SURCHARGE		£150 ULEZ									21.5% of permit price						N/A	£40	N/A	N/A

- 5.8. The following chart gives an example of the proposed permit prices of residential permits for a range of vehicles. All these permits are shown as in the same tier (tier 2 medium enforcement) so are subject to an existing basic charge of £110 per annum or £260 if the additional £150 diesel levy also applies.

VED Band	Vehicle	Year	Fuel	CO2 g/km	Current charge	Proposed emissions based charge	£150 ULEZ charge	Proposed total charge	Difference +/-
A	Fully Electric		Electric	0g/km	£20	£20	£0	£20	-£0
B	BMW i3	2017	Hybrid	12g/km	£110	£60	£0	£60	-£50
C	Toyota Prius	2016	Hybrid	70g/km	£110	£70	£0	£70	-£40
D	Fiat 500	2016	Petrol	88g/km	£110	£80	£0	£80	-£30
E	Audi A1	2017	Petrol	97g/km	£110	£90	£0	£90	-£20
F	Ford Fiesta	2016	Petrol	104g/km	£110	£100	£0	£100	-£10
G	Smart Car	2008	Petrol	111g/km	£110	£110	£0	£110	£0
H	Mercedes-Benz E-Class	2015	Diesel	147g/km	£260	£130	£150	£280	+£20
I	Ford Focus	2016	Petrol	159g/km	£110	£170	£0	£170	+£60
J	Skoda Yeti	2015	Petrol	184g/km	£110	£260	£0	£260	+£150
K	Mercedes Benz E Class	2008	Diesel	196g/km	£260	£330	£150	£480	+£220
L	Ferrari California	2016	Petrol	251g/km	£110	£410	£0	£410	+£300
M	Mercedes-Benz E Class	1999	Diesel	not recorded	£260	£500	£150	£650	+£390

- 5.9. The CO2 based element, ULEZ supplement will also be applied to all Business, Teacher, Trade permits to park in CPZs. Existing, and proposed charges are shown in full in Appendix 5.

Annual visitor Permit

- 5.10. The Council currently offers an annual visitor permit which is intended to enable parking for residents' regular visitors. Prior to January 2020, the annual visitor permit was not subject to the diesel levy that had been introduced to residents'

permits in 2017. Sales of this permit were relatively high at an average of over 300 sales per month and it is possible that it was being purchased by some residents with a diesel car to avoid the diesel levy. In January 2020, the price of this permit was increased significantly as well as the diesel levy becoming applicable. As a result, monthly sales of these permits fell sharply to under 100 just after the prices increased, and have remained considerably lower since, at around 100-150 per month.

- 5.11. The annual visitors' permits are not vehicle specific so it is not possible to vary the charge based on vehicle emissions in line with the proposals for other types of permit. This again creates a risk of potential loopholes that may enable more polluting vehicles to avoid the proposed charges. It is therefore proposed that the cost of the Annual Visitor Permits should be increased to the highest level of residential permit charge plus the ULEZ supplement, to give a maximum proposed cost of £690 depending on CPZ location.
- 5.12. It is anticipated that this proposed price increase will further reduce sales of this permit. The Council will continue to monitor demand and may consider phasing out this permit type in future subject to the appropriate consultation process.

Scratch cards and visitor e-permits.

- 5.13. In January 2020 the Council introduced the RingGo cashless parking payment APP which enables visitors to purchase e-permits online. E-permits purchased via the RingGo app have increased to account for 40% of visitor permit sales. This technology enables the Council to now introduce emissions based charges for visitor e-permits as the system will automatically work out the emissions of the vehicle when the registration is entered during the purchase of an e- permit.
- 5.14. The charging rates will be based on the VED CO2 emission bands and will increase by 25 pence for each emission band. For example, for a tier 2 location where the visitor charge is currently £4.50 for a full day, the proposed rate will start at only £3.25 for a low polluting vehicle (Band B), but increase incrementally to £6.00 for the most polluting. A ULEZ supplementary charge of £1.50 per visit will also be applied to non-compliant vehicles. See Appendix 5 for a full schedule of proposed prices. Visitor parking will be free for fully Electric Vehicles (Band A).
- 5.15. Visitor permits are also provided via a scratch card system. However, scratch cards are administratively expensive and do not allow emissions based charges to be applied, which could also provide a loophole to enable more polluting vehicles to avoid higher charges.
- 5.16. It is therefore proposed that scratch cards be priced at the highest rate of VED band, plus the ULEZ charge. This also reflects the additional administrative costs to the Council. The demand for scratch cards will be assessed annually with a view towards phasing these out in the long term as sales via the RingGo APP increase.

On and off-street short-term parking

- 5.17. Merton does not currently have an emissions-based model for motorists that park in pay and display bays on the street or in our car parks. The current charge is a set charge based on location, capacity and duration, with the aim to achieve regular turnover of spaces or permit longer-term commuter parking as appropriate.
- 5.18. It is considered appropriate that an emissions based charging model is applied to our on and off street parking locations in order to discourage parking of high polluting vehicles. It is proposed that non-ULEZ compliant vehicles will incur an additional charge of £1.50 for each short term parking session at all pay and display parking locations, both on street and in council owned car parks.

Pay and Display Machines

- 5.19. 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.
- 5.20. 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 on street emission based charging.
- 5.21. 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.
- 5.22. 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.

Season Tickets

- 5.23. Annual season ticket prices for Merton car parks increased in January 2020 and holders also became liable to pay the diesel levy of £150 if they owned a diesel vehicle. It is proposed that the diesel levy is replaced with the ULEZ based charge.
- 5.24. However, it is recognised that the annual season ticket model does not fully reflect the Council's transport objectives or incorporate the principles of emissions based

charging as is proposed for on-street permits. The existing annual season ticket model needs wider review as it is not considered to be in line with travel demand management best practice because a one-off annual payment for unlimited trips encourages frequent use to obtain the best value for money. A model, which attaches a price to each trip, would better facilitate and encourage a reduction in the number of commuter trips by car. The impact of Covid-19 and increase in remote working makes it even more important that the season ticket model is based on a price per use rather than upfront annual cost.

- 5.25. A flexible or rolling season ticket would enable day tickets to be purchased in batches that can be used anytime. For example, if someone only travelled to the office for 2 days per week they could buy a batch of 10 tickets which would cover their parking for at least one month. Not only are they not paying for the days they don't travel, if they further choose to travel by sustainable modes on any of those days, they can save the day tickets for use at a later date. Horsham Council have for example introduced the "rolling season ticket" option, which enables the purchase of day tickets in batches of up to 25. It would also be possible to use the RingGo APP to apply emissions based charging model to the rolling season ticket.
- 5.26. Proposals for a more robust and consistent approach to season tickets will be developed for further consideration.

6. CONSULTATION RESPONSE

- 6.1. Merton undertook a comprehensive consultation on the proposed emissions based parking charges to gain the views of residents and stakeholders. This consultation formed part of a statutory consultation process which met the Council's legal obligations, which includes a requirement to bring the proposals to as wide an audience as possible.
- 6.2. The consultation was conducted from 10th September to October 26th, which provided sufficient time to fully engage with residents, stakeholders, and community and equality groups.
- 6.3. The Council received no objections to the proposals from Statutory Consultees. The response from TfL was supportive and welcomed the approach proposed and in particular the recognition that the appropriate management of car parking can have wider benefits in terms of mode shift, reduced air quality and carbon emissions and public health. They supported the proposal to replace the diesel levy with a surcharge based on ULEZ compliance, which is a more nuanced approach and has the benefit of using a pre-existing standard, making it more understandable to the public. TfL support the proposal and believe it is appropriate given the significant impacts private vehicles can have, particularly those with high emissions travelling through relatively densely populated urban areas.
- 6.4. As part of the consultation an online survey was made available to all who live, work, study or visit Merton. 1600 responses were received. The questions asked along with an analysis of the responses are shown in Appendix 1.

- 6.5. 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, they may be more likely to give a negative response. Non-car owners that will benefit from the outcomes of the proposal were under represented in the responses.
- 6.6. 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”.
- 6.7. 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.
- 6.8. Approximately 20% of respondents think that the charges have been set at a level that will achieve the sustainable travel objectives. A large majority of respondents did say that the proposals would be unlikely to change their travel behaviour. However, a minority did think it would change their behaviour and it is worth noting that if those percentages are realised across all CPZs it could have a significant transport impact. For example, only 5% of respondents said they would consider getting rid of a vehicle, but this could equate to a reduction of approx. 1000 vehicles. 15% said they would be likely to consider a lower emission vehicle, 10% a fully electric vehicle and 13% said they would be likely to increase their use of sustainable modes.
- 6.9. Respondents were asked about the importance of measures to support sustainable transport choices and the largest proportion felt that better public transport was important (84%) followed by pedestrian facilities (74%). 62% of respondents also felt that both cycle routes and cycle parking facilities were important. Slightly more than half thought that more EV charging points were important.
- 6.10. To ensure the council could generate as much feedback as possible, representations were invited in writing via online consultation web page, or by email to a dedicated email box. Approximately 60% of those completing the online survey also provided additional comments. Appendix 3 contains a summary of and responses to the written representations received.

- 6.11. There are a number of key themes that reflect the written responses received and the following section seeks to address these.

Income generation

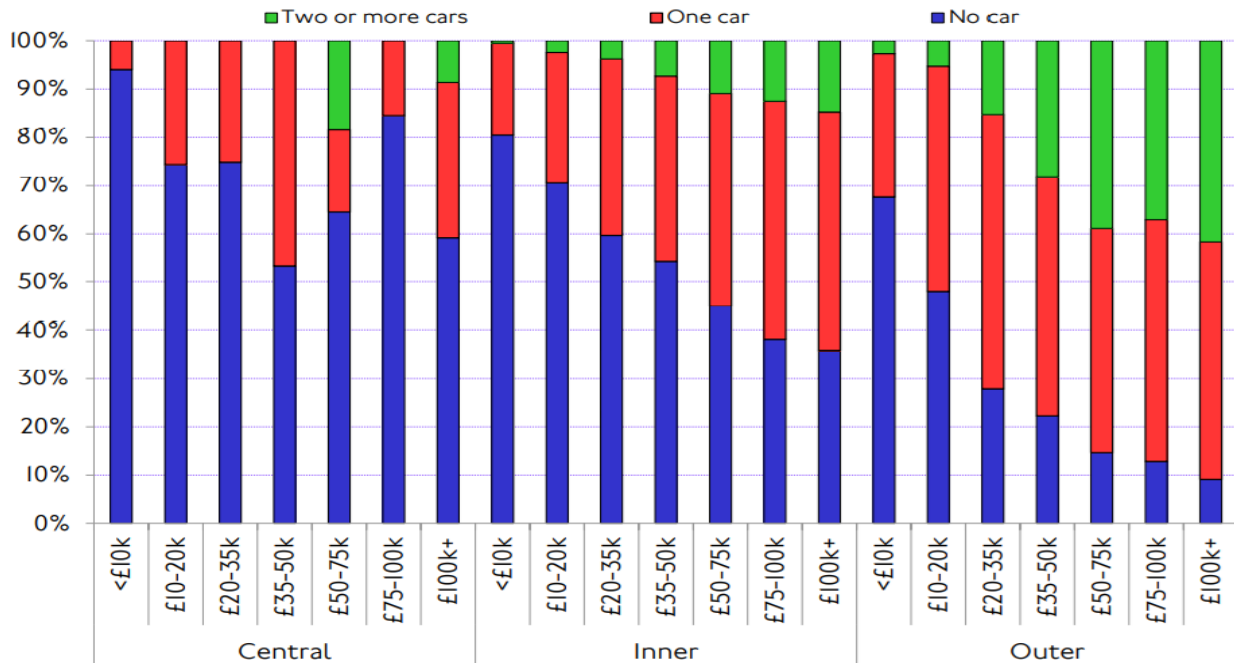
- 6.12. A large number of the respondents felt that the main purpose of the proposals was to generate income and some questioned what parking revenue is spent on. In addition, they were concerned that the charges when the CPZ was set up were initially just to cover costs but now appeared to be used to raise revenue
- 6.13. The primary objective of the proposals is to set pricing signals that incentivise residents to reduce their use and ownership of cars or to consider switching to a lower emission model. It should be noted that as the proposals achieve these objectives and residents change their travel choices, the income from parking permits is projected to decrease.
- 6.14. However, in the short term, the proposals are projected to generate an additional surplus. The council can only spend the money it receives from parking charges in the manner set out in the Road Traffic Regulation Act 1984 (RTRA) which directs that income cannot be used for general Council expenditure. The RTRA only allows authorities to spend surplus income on the day-to-day management of the parking service, public passenger transport services, local road improvement projects, carriage & footway maintenance, and environmental related expenditure. Surpluses from parking activities are currently used to contribute towards the “freedom pass” concessionary travel scheme for Merton residents, and carriageway and footway maintenance.
- 6.15. It is proposed that a proportion of any additional surplus generated by these proposals would also be reinvested directly into measures to financially incentivise residents to give up permits and to support complementary sustainable transport measures, thus further contributing towards the Council’s objectives. Any applicable incentivisation measure, as mentioned in Section 7 of this report, will need to be costed so that the relevant funds can be ‘set aside’ accordingly.

Charging Levels and Affordability

- 6.16. A large number of respondents felt that the charges were too high and concerns were raised that the charges were unaffordable and would have a detrimental financial impact on lower income groups.
- 6.17. Charges have been considered and set at levels, which will disincentivise car ownership and use and encourage consideration of lower emission vehicles. According to data from the RAC foundation the costs of motoring over the last decade have reduced in relation to both the cost of living and average wages. This is in comparison to public transport costs which have increased. This is likely to have incentivised car use and the proposals aim to mitigate against this at a local level.
- 6.18. The council is mindful of economic challenges facing many residents and visitors to the borough, but this needs to be balanced with obligations in relation to poor

levels of air quality and to improve public health. Poor air quality and public health outcomes are known to particularly affect vulnerable groups including those on lower incomes.

6.19. Evidence from Transport from London indicates that lower income groups in Outer London are less likely to own a vehicle (TfL Travel in London report 12). Therefore, lower income groups are much less likely to be affected by the proposals, although they are more likely to suffer the negative impacts of car use.



Source: Strategic Analysis, TfL City Planning.

6.20. It is recognised that in some areas with little transport alternative to owning a car the upfront and annual costs of car ownership can result in people being pushed into transport poverty. This does not tend to apply to London, including significant parts of Merton, where sustainable alternatives tend to be good. Some lower income areas in the Borough that are particularly affected by poorer transport accessibility do consequently have higher levels of car ownership (e.g. Pollards Hill and Longthornton Wards). As these areas do not tend to have CPZs they will not be affected by these proposals. However, 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.

6.21. There are also supporting transport measures in place for low-income groups that will help to mitigate the impact of these proposals. TfL offer a [scrappage grant](#) of £2k to London residents who are on certain benefits and have a car that does not comply with ULEZ standards. TfL also offer [discounts](#) of 50% on some public transport services for London residents on certain benefits, which makes sustainable transport options more affordable.

Disabled residents

- 6.22. Respondents raised concerns about the impact of the proposals on the disabled, carers and the elderly, particularly those that may be affected by social isolation.
- 6.23. Merton is committed to supporting its residents that have mobility issues and is a member of the national Blue Badge scheme, which provides a range of parking and other motoring concessions for people who are registered blind or have severe mobility problems. In 2019 The Blue Badge eligibility scheme was further extended to those with a wide range of hidden health issues that affect their mobility.
- 6.24. A Blue Badge holder in Merton is also entitled to apply for a free carer permit under certain conditions to further support those residents with mobility issues and in need of regular support and care.
- 6.25. Blue Badge holders are unaffected by these proposals and can continue to park free of charge in any Merton disabled parking bay, pay & display and shared use bay or permit holder bay. Carers permits are also unaffected by these proposals and will not be subject to emissions based charges.
- 6.26. Elderly residents are not exempt from the charges unless they have specific mobility issues that entitle them to a blue badge and/ or carers permit. However, it should be noted that car ownership rates begin to decline in those over 70 and fall dramatically amongst those over 80, so that this age group has the lowest rates of car ownership with less than 50% owning a vehicle.
- 6.27. Older and disabled residents are also eligible for the freedom pass that enables them to travel free on all public transport services in London during off-peak hours which is a significant benefit that supports the use of sustainable transport modes.
- 6.28. Other transport schemes including dial a ride and Merton Community Transport are also available to assist Merton residents who have a substantial and permanent physical or sensory disability that affects their mobility and means they are unable to use public transport without extreme difficulty.

Require a car

- 6.29. Many respondents felt that they needed a car due for a variety of work, family or lifestyle reasons. This included parents that mentioned practical difficulties associated with transporting dependent children, particularly for the school drop off and pick up. Some parents of pre-school children also mentioned difficulties, particularly with some public transport services that do not have step free access. It also applied to people requiring a vehicle to access work due to location, shift work or the need to carry equipment.
- 6.30. It is recognised that some residents will continue to need a car for essential work purposes. The main objective of this scheme is to discourage unnecessary car use with the aim of reducing parking pressure and congestion, which will be of benefit to people who do still need to drive for essential purposes.
- 6.31. The Council does appreciate the logistical difficulties raised by parents and it is recognised that some parents may want or need to drive their children to school/

nursery. However, this can make the street environment more intimidating and polluted for other children cycling or walking to school. 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. This highlights the difficult balance that the Council needs to strike to enable parents to access schools whilst improving active travel options and road safety and reducing the impacts of air pollution, all of which particularly affect children.

- 6.32. For these reasons, Merton aims to encourage active travel to school and has been working with schools on implementing school travel plans including measures such as cycle training. Recently the Council has gone further and taken the bold step of implementing school street schemes that prevent parental parking during pick up and drop off times at 27 Schools across the Borough.
- 6.33. It should also be noted that a significant proportion of parents do not own a car. TfL data for London shows that households with children on incomes deciles under £35k, are 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, which has the potential to improve air quality around schools for children.

Require a vehicle for occasional use

- 6.34. A number of respondents felt that the proposal was unfair because it penalised people that only used their car occasionally and that they were not significant contributors to emission because “parked cars do not pollute”.
- 6.35. Infrequently used cars parked on street do cause transport problems by creating streets that are dominated by cars and take up space that can be used for sustainable transport schemes such as cycle lanes and cycle parking. There is also evidence that excess parking demand leads to lack of available spaces and cruising for parking, which causes inconvenience for other residents and adds to congestion and air pollution.
- 6.36. Once residents have invested in the upfront cost of owning a car they will be much more likely to use it, even for short trips. Data from TfL (Travel Demand Report 12) demonstrates that those with a car drive a lot more than those with no car and households with 2 cars drive even more. This supports the Council’s objective to encourage residents to reduce their vehicle ownership.
- 6.37. Car clubs give residents the option of using a car occasionally on a pay as you go basis, without the hassle of owning a car. Merton has a network of up to 60 car club vehicles mainly located within the CPZ areas in the borough.

Non CPZ areas/ should be borough wide

- 6.38. A large number of respondents felt that it was unfair that the proposals only affected areas with CPZs and felt that to be effective the policy should be implemented borough wide.
- 6.39. It is recognised that the current proposals will not address all car users in Merton, but it is not possible for the Council to implement a scheme that achieves this. The

proposal will apply to approximately 30% of vehicles in the borough so has the potential to make a valuable contribution to our transport objectives.

- 6.40. CPZs were implemented to ensure residents had priority access to parking space in response to excessive demand, often from vehicles from outside the area. The CPZs are therefore often in proximity to demand generators such as town centres and transport hubs that people would wish to drive to. For this reason, CPZ areas tend to have better transport accessibility than other parts of the borough, so residents will have better sustainable alternatives transport options available to them.
- 6.41. It should also be noted that any cars from non-CPZ areas driving to another destination and parking in the Council's car parks or pay and display bays will still be affected by the relevant aspects of the proposals, so it may influence them to drive less within the borough.

Private parking and driveways

- 6.42. There were a number of comments received highlighting that it was unfair that residents in CPZ areas who have private driveways were not affected by the current system or the proposed changes.
- 6.43. It is recognised that the current proposals will not address all car use in Merton, but the Council does not have the powers to impose charges on private parking facilities.
- 6.44. Part of the justification for parking charges is to cover the administration, enforcement and maintenance of the CPZ areas. Residents with private drives that do not use CPZ bays would not be expected to meet this operating cost. In addition, cars parked off street do not contribute towards the specific problems associated with on street parking dominance.
- 6.45. Owners of properties with off street parking do have to meet the associated costs of parking themselves including through ongoing maintenance and cost premiums to purchase properties with parking facilities. The costs of installing a driveway and dropped kerb are substantial and many times higher than the cost of an annual permit.

Incentivise sustainable transport

- 6.46. A large number of respondents commented that the Council should follow an approach of incentivising sustainable transport options instead of punishing car drivers.
- 6.47. Merton's Transport Strategy (LIP 3) sets out a range of policies that the Council will implement in conjunction with TfL to support sustainable transport choices. Merton benefits from good access to public transport, with the borough served by 10 mainline rail stations, London Underground services, tram link and a network of 28 bus routes. In recent years, Merton Council has spent well over £1 million per annum on delivering sustainable transport initiatives including infrastructure schemes such as pedestrian crossings and cycle routes and supporting measures such as cycle training and school travel plans. Schemes successfully delivered

include; the borough wide 20mph speed limit, the Raynes Park to New Malden cycle and pedestrian link, a number of bus priority schemes and major regeneration of Mitcham Town Centre.

- 6.48. However, use of sustainable transport has been falling in Merton over recent years, so it appears that the sustainable transport measures implemented are not sufficient on their own and that measures that are more robust are also required to achieve the required modal shift. 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 mode shift will likely be limited to well below the levels required to achieve transport objectives.
- 6.49. In response to the consultation responses requesting incentives for sustainable travel, a number of additional initiatives have been put forward for additional consideration in this report, as set out in section 7. These include a scheme to financially incentivise residents to give up permits and measures to support sustainable transport choices, such as residential cycle parking.

EVs too expensive

- 6.50. A high number of respondents raised the cost of Electric Vehicles as being too high to realistically enable them to change their vehicle.
- 6.51. The Government has recently pledged to continue grants for those buying zero or ultra-low emission vehicles to make them cheaper to buy and incentivise more people to make the transition. EVs do currently have a significantly higher initial purchase cost, although they are projected to achieve cost parity by 2024. In the meantime, when other savings in fuel costs, taxes and other charges are taken into account, then EVs become more financially competitive.
- 6.52. It should also be noted that 9 out of 10 newly purchased vehicles are purchased through pay monthly finance schemes, which makes the upfront vehicle cost less of a barrier and associated costs such as tax and parking more relevant to monthly cost calculations. The Government also introduced changes to tax rules in April 2021 that enable EVs to be purchased with tax savings through a workplace salary sacrifice scheme, which some residents may be eligible for through their employer.

Covid-19 Impacts

- 6.53. A large number of respondents commented upon the impact of Covid-19 on this proposal and felt that it was an inappropriate time to introduce these changes. Respondents particularly felt that the Covid-19 situation creates a greater requirement for personal vehicles in order to avoid public transport in accordance with government advice. They were also concerned that the Covid-19 situation may add to the financial impact of the proposals because of the likelihood of increased unemployment, redundancy and reduced earnings. Due to financial pressures, residents facing an uncertain future may be unwilling or unable to take out loans or increase their debts to purchase a new vehicle. Some residents may

also be directly affected by illness and mental health problems due to feeling isolated.

- 6.54. The Covid-19 crisis developed just after Cabinet approval of the consultation on emissions based parking charges in March 2020. It is recognised that the Covid-19 pandemic has since had a significant impact on work and travel patterns and that people have, for periods, been advised to avoid public transport.
- 6.55. Covid-19 has presented an opportunity to embed some significant changes to travel behaviour such as increased home working and has demonstrated that when car journeys are reduced the improvements achieved can be significant. However, the crisis also presents a threat to our transport objectives with the potential for an increase in car journeys as people reduce their use of public transport. Indeed, parking permit sales increased in September at the end of the first lockdown, which may have been as a result of residents switching to cars to travel. This has reinforced the need to act robustly and quickly to ensure that any changes to transport behaviour as a result of Covid-19 do not further contribute to the transport challenges we face.
- 6.56. It is not proposed to implement the proposal until April 2021, by which time it is hoped that the situation will be improved and restrictions on public transport will be fully lifted. The situation will continue to be monitored and it is proposed that authority is delegated to Director of Environment and Regeneration in consultation with the Cabinet Member for Regeneration, Housing and Climate Change to amend the timing of the implementation as necessary in light of the situation, particularly any restrictions on public transport use.

7. ADDITIONAL PROPOSALS AND IMPLEMENTATION OF SCHEME

- 7.1. The consultation results have been analysed and the overall opposition to the proposals is noted. The responses received have been carefully considered and responses given. It is not considered that the responses raised in opposition to the proposal provide a significant enough justification to outweigh the benefits of implementing the scheme as set out in this report. It is therefore recommended that the scheme be implemented without any significant amendment.
- 7.2. However, a number of further measures and minor amendments are now proposed for further development and consideration in response to comments received. These are set out below and include mitigating measures to support sustainable transport choices which could be funded directly from income raised from the scheme. Further detailed proposals will be developed on individual measures before presentation to Cabinet and any additional costs reflected in a revised financial forecast.

Sustainable travel incentives for surrendering a permit

- 7.3. One of the primary objectives of the emissions based parking proposals is to encourage residents to give up a vehicle. This scheme would directly reward residents that give up a parking permit with the provision of sustainable travel incentives. Similar schemes have been implemented in other boroughs including Camden and Brent.

7.4. To support sustainable travel an incentive package could include a choice of an either an Oyster card loaded with credit for use on public transport or the equivalent contribution towards cost of a bicycle. The package would also include car club membership and driving credit to support residents who may require occasional car use.

7.5. ***Residential Cycle Storage***

7.6. The Council has funding to install 15 secure cycle storage units on street in residential areas during the current financial year. Further units will likely be installed in future years due to a high demand from residents.

7.7. Parking income could be used to subsidise the annual management and maintenance cost that residents have to pay per space in unit (£72). This has already been implemented by other boroughs including Waltham Forest who subsidise the cost to reduce it to £20. This would bring charges in line with our EV charge as it would be inconsistent for cyclists to pay more than this to park a bike.

Parklets

7.8. As demand for parking decreases, the freed-up street space in areas with low parking demand, could be used to install mini public space areas with seating known as “parklets” in parking bays. This would improve the street environment in line with Mayor’s Healthy Streets approach. Further investigation will be conducted into a scheme to fund a number of parklets in CPZ areas in response to demand from residents.

EV charging and car club networks

7.9. Lack of EV charging facilities in CPZ’s was raised as a barrier to uptake in the consultation and more than half of respondents thought this was an important measure. Based on projections in a report by The International Council on Clean Transport (ICCT) Merton will need to install 100 additional charge points per year to meet demand but it is not clear what funding will be available for this. So if necessary, to ensure the charging infrastructure is in place to meet demand the Council may need to consider using any surplus income generated by this scheme to support the provision of EV chargers, particularly in CPZ areas where residents may not be able to use their own domestic supply. In addition, the Council may need to consider changing policy to provide dedicated EV bays adjacent to chargers to ensure that the bays are not taken by other residents.

7.10. There is also the potential to work with car club operators to install more fixed-point car club bays in CPZ areas and to expand existing flexible operating zones to more of the borough. To encourage operators to expand, the Council will explore various options, including reducing the price of car club parking permits, which currently cost up to £1200 per vehicle.

Flexible Season tickets

7.11. The Council will further explore options to update the existing annual season ticket model as set out in more detail in Section 5.

Permit caps

- 7.12. A number of consultation responses mentioned introducing limits or caps on the number of permits a household is eligible for. Caps on the number of permits per household are recommended in parking policy guidance. TfL data shows that households with more than 1 car have significantly higher car use, so limiting the number of vehicles owned will contribute towards transport objectives.
- 7.13. In Merton approximately 10 - 15% of permit holders buy a second permit and 2% buy a third. In the existing pricing structure 2nd permits are £50 more than the base charge and a 3rd Permit is £100 more. One option is to increase these supplementary charges further, although the proposals will also require all vehicles, including additional permits per household to pay the full applicable emissions based charge.
- 7.14. In Merton a cap at 2 permits would only affect approx. 250 households but a cap at 1 permit would affect approximately 2 thousand households. A 2 permit cap would therefore be less effective but a 1 permit cap could negatively affect a large number of residents. Rather than retrospectively apply the cap to remove existing permits, it is therefore, recommended that Merton introduces a permit cap only to new applications for additional permits over 1 per household. For example, someone moving into the borough would only be eligible for 1 permit and an existing household with 1 permit couldn't apply for another. In addition, the Council will further investigate whether it's feasible for the cap to include consideration of residents' access to off street parking, so that someone with a driveway would not be eligible for an additional on-street permit.
- 7.15. Members are specifically asked to comment on the options for the introduction of a permit cap to inform the development of more detailed proposals for further consideration. Any further proposals would be subject to the relevant legal requirements in relation to a statutory consultation.

Implementation

- 7.16. It is recommended that Members approve the emissions based parking scheme as set out in this report, to be implemented from April 2021 or as soon as practicable thereafter.
- 7.17. Whilst the target date for implementation of the proposals remains April 2021, the Council is mindful of the current uncertainty caused by the ongoing Covid-19 situation and the impact this might have on proposals. In particular, any ongoing restrictions or concerns on the use of public transport will have an impact on the ability of residents to use sustainable travel alternatives to the car. The situation will continue to be monitored and it is proposed that authority is delegated to Director of Environment and Regeneration in consultation with the Cabinet Member for Regeneration, Housing and Climate Change to amend the timing of

the implementation as necessary in light of the situation, particularly any restrictions on public transport use.

- 7.18. The successful implementation of the scheme will depend on establishing the necessary administrative procedures and systems, particularly in relation to the RingGo online charging app. RingGo have successfully delivered emissions based parking schemes for a number of London boroughs including Camden and Islington. It is recommended that authority be delegated to the Director of Environment and Regeneration in consultation with the Cabinet Member for Regeneration, Housing and Climate Change, to approve the operational details associated with scheme.
- 7.19. This will include setting up an appropriate communications strategy to inform residents and permit holders in advance of details of the parking regime. Due to the complexity of the proposals, particular attention will be given to ensuring that residents are provided with adequate information and support to understand what the proposals mean for them.

Measuring Success

- 7.20. The Council will use a range of measures and indicators to monitor the success of the proposals. Success will primarily be measured as part on the ongoing annual monitoring of Council's transport objectives and targets as set out in Merton's Transport Strategy (LIP3).
- 7.21. As set out in Section 4 of this report, parking charges are part of a package of measures that together will achieve the Council's objectives on transport, public health, air quality and climate change. National and regional policies and initiatives are also expected to have a significant impact on travel choices. When measuring our progress against these objectives it is therefore difficult to assess the precise impact the parking charges have had.
- 7.22. The key LIP3 targets relative to this proposal are set out in the tables below. As can be seen, the Council has not been making significant progress or has even been going backwards in key targets including sustainable mode share, active travel, volume of traffic and car ownership, and has to make significant progress to meet the targets. Despite increases in car traffic, there have still been reductions in total emissions of all pollutants, which has mainly been as a result of improving vehicle technologies, but significant further progress is still required in these areas to meet the LIP targets.
- 7.23. The Council will also annually measure a range of other indicators that demonstrate the success in implementing these proposals. The primary indicator of success will be the amount of permits issued per fuel type and per emissions band. The Council will also measure a range of transport deliverables that contributes to and support this proposal as set out below:
- Number of parking permits issued by fuel type and emissions band
 - Number of EV charge points
 - Number of car club vehicles and active car club members

- Number of cycle parking spaces

	Observed (rolling 3 year averages)				LIP3 target	
	2012/13 to 2014/15	2013/14 to 2015/16	2014/15 to 2016/17	2015/16 to 2017/18	2021	2041
Sustainable mode share: Walking, cycling and public transport % mode share by borough resident	61	60	58	56	60	73
Outcome 1a: Proportion of Londoners doing at least 2x 10 minutes of active travel per day		38	36	33	43	70

	Observed					LIP3 target	
	2013	2014	2015	2016	2017	2021	2041
Outcome 3a: Reduce the volume of traffic. Annual Vehicle Kilometres (millions)	-	575	570	571	571	570	542
Outcome 3c: Reduce car ownership		75,250	76,593	78,497	76,811	73,800	72,500
Outcome 4a: Reduction in CO2 emissions from road transport (tonnes)	131,100			131,400		117,200	29,900
Outcome 4b: Reduction in NOx emissions (tonnes) from road transport	460			390		190	20
Outcome 4c: Reduction in PM10 emissions (tonnes)	48			43		39	21
Outcome 4d: Reduction in PM2.5 emissions (tonnes)	27			23		19	11

8. FINANCIAL, RESOURCE AND PROPERTY IMPLICATIONS

- 8.1. 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 to encourage a reduction in car ownership and a shift to lower emissions models. The financial implications of the proposals have been modelled based on assumptions about the impact of the proposals on behaviour over the next 5 years.
- 8.2. At present, savings ranging from £750k-£1,000k have been proposed for 2021/22 and 2022/23, with growth of £150k-£200k (2023/24) and £135k-£180k (2024/25) proposed for the following two years. These figures are net of additional revenue costs that will be incurred, ranging from additional repair & maintenance costs of machines, DVLA transactions fees, and project support. However, the figures exclude the proposed incentivisation schemes, which will be kept under review and costed as and when they are approved. Capital funding of £500k has been agreed for infrastructure including new and upgraded parking machines.
- 8.3. The overall level of income will be dependent on the actual implementation date, the level of charges agreed following due process and consideration and the subsequent change in motorists' behaviour. It is important to note that the raising of income is not a contributing factor to any decision making process. Local authorities are not permitted to use parking charges as a means of raising income. When setting charges, the focus must be on how the charges will contribute to delivering the Council's traffic management and key sustainability objectives.
- 8.4. 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.
- 8.5. Any additional surplus from emissions based charging will continue to contribute towards these activities. In addition, a portion of any additional surplus generated by these proposals may be reinvested directly into measures to financially incentivise residents to give up permits and to support complementary sustainable transport schemes, thus further contributing towards the Council's objectives.
- 8.6. The Council usually receives a substantial annual financial settlement from Transport from London to deliver a programme of sustainable transport schemes as set out in the Local Implementation Plan (LIP3). Covid-19 has had an impact on finances at all levels of government, particularly affecting the income that TfL receives from public transport fares and this has had an implication on the transport funding Merton has received in 20/21. It is not clear what the impact of Covid-19 on future funding settlements for transport will be, but this may have a detrimental impact on the ability of the Council to deliver planned sustainable transport schemes as set out in LIP3, which are essential to achieving the Council's transport objectives. If necessary, surplus income generated through this proposal could be reinvested into supporting the delivery of sustainable transport schemes, which would also support the aims of this proposal.

9. ALTERNATIVE OPTIONS

- 7.1. To support the Council's strategic transport objectives a number of options were considered as an alternative to the emissions based charging proposals set out for approval in this report.
- 7.2. One option is to not to introduce emissions based charges and either retain the existing scheme. If we do nothing then it is not considered that this will have sufficient influence on travel behaviour, which will have a detrimental impact on Merton's ability to achieve its strategic objectives in relation to transport, public health, air quality, and climate change.
- 7.3. Another option is to use the model proposed but with higher or lower costs. A lower level of increases would not have the influence on behaviour change necessary to achieve the Council's strategic objectives. A higher level of increases could have too great a detrimental financial impact on residents that rely on a car at the current time.
- 7.4. Many London boroughs have now introduced emissions based charges but with varying models, including those that use less charging bands. Whilst this option seems more simplistic, it creates larger "cliff edges" between bands, that may be perceived as unfair by residents. In addition, basing the model on the pre-existing national VED categories will make the model easier for the public to understand.
- 7.5. A further option is to retain the diesel levy and not change to the proposed ULEZ model. This would only have an effect on Diesel vehicles, and would not address the more polluting petrol vehicles that contribute towards climate change emissions. In addition, basing the model on the pre-existing regional ULEZ scheme categories will make the model easier for the public to understand, particularly those residents that may already be affected by a requirement to travel into the expanded ULEZ zone in our neighbouring boroughs.
- 7.6. Another option is to revert to a standardised price for all permits across the borough. This would be a less complex alternative but this would not incorporate an element to incentivise vehicles with lower emissions so would not contribute towards the Council's strategic objectives in this area.

8. LEGAL AND STATUTORY IMPLICATIONS

Legal and regulatory requirements of Parking and transport management.

Statutory Provisions

- 8.1. The Road Traffic Regulation Act 1984 (s.122(1)) specifies that the functions conferred on local authorities under the Act should be exercised:
"to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway".

- 8.2. Those matters to which local authorities are required to have regard when complying with s122(1) are set out in s.122(2) of the Act), namely:
- a) The desirability of securing and maintaining reasonable access to premises;
 - b) The effect on the amenities of any locality affected and (without prejudice to the generality of this paragraph) the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run;
 - c) The strategy prepared under Section 80 of the Environment Act 1995 [National Air Quality Strategy]
 - d) The importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles.
 - e) Any other matters appearing to the local authority to be relevant.
- 8.3. Under Section 45 of the Road Traffic Regulation Act 1984 (RTRA 1984) local authorities may designate parking places and may make charges for vehicles left in a parking place so designated. In exercising its functions under the RTRA 1984, including the setting and variation of charges for parking places, the Council must do so in accordance with Section 122 of the RTRA 1984 above.
- 8.4. In accordance with the council's duty under Section 122, the Council must have regard to these relevant considerations in the setting and variation of charges. Setting pricing levels on the basis set out in this Report appears to be consistent with the requirements of the Act (provided that countervailing factors are also taken into consideration, as they have been in the present proposals).

Procedure

- 8.5. The Council may vary off-street and on-street parking charges by either making traffic management orders or by notices given pursuant to ss35C and 46A, The Road Traffic Regulation. The procedure for do so, by either method, is set out in The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996.
- 8.6. In this case, it is considered appropriate to vary the charges by way of making traffic management orders. Before doing so the Council is required to consult those likely to be affected such orders. This statutory consultation was carried out at the same time as the general wider consultation.
- 8.7. Should the emission based parking charge scheme be approved, the Council is required within 14 days of making the relevant orders to give notice of having done so. It is also required to notify in writing those persons who submitted objections that were not withdrawn or acceded to by the Council. The notification shall include the reasons for the decision.
- 8.8. The current proposal in to adopt the emission based charging scheme as set out in the in the statutory notices of proposal that were published in the local press. The traffic order making regulations allow modifications to be made to proposals in consequence of any objections or otherwise. Before an order is made with

modifications which appear to the Council to make a substantial change in the order the Council is required to take the following steps:

- a) inform person likely to be affected by the modifications;
- b) give those persons an opportunity to make representations; and
- c) ensure that any representations are duly considered by the authority.

10.9 The objections and changed working patterns due to Covid-19 pandemic give rise to two modifications that would improve the emissions based charging scheme, respectively:

- a) a cap on permits for applications (described in paragraphs 7.11 – 7.14). and
- b) the provision of rolling season tickets (described in paragraphs 5.18 – 5.22);

Both modifications appear to make a substantial change in the proposed orders and to require consultation with those likely to be affected, as set out in paragraph 10.8. All those currently residing in properties within a CPZ are affected by modification a); and, all users of off-street car parks for which a season ticket may be purchased are affected by modification b). Two options are available 1) to consult those likely to be affected by the proposal as described in paragraph 10.8 before making traffic orders; or 2) proceed with the proposals without modification and after April 2021 consult on the proposals to make further traffic management order to incorporate the two modifications.

10.10 If the implementation of emission based charging scheme is to be at the discretion of the Director of Environment and Regeneration in consultation with the Cabinet Member (described in paragraph 6.48) the traffic order regulations impose a two-year deadline. The traffic orders may not be made after the expiration of two years beginning with the date of the notice of proposals relating the order was first published.

Fiscal Implications

10.11 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.”

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

Application of Revenue

- 10.13 Section 55, Traffic Regulation Act 1984 sets out the financial provisions relating to designation order (by which on-street and off-street parking places are designated). This includes the requirement for the Council to keep an account of its income and expenditure. Deficits are made good out of the Council's general fund which may be made good in subsequent years from any surplus. Sub-section (4) sets out the purpose for which surpluses may be applied, which include:

(a) To make good the general fund for any expenditure incurred in the previous four years to satisfy deficits which accrued in relation the parking places account,

(b) For the provision of or maintenance of off street parking (whether in the open or not)

(d) 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,

(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.

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

- 10.15 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)

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

- (a) *eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this act;*
- (b) *advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;*
- (c) *foster good relations between persons who share a relevant characteristic and persons who do not share it.*

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

10.17 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

10.18 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.

10.19 The PSED is a duty to have due regard to the specified issues, and not to achieve a particular outcome.

10.20 Members should have due regard to the Council’s Equality Impact Assessment which accompanies this Report.

Decision-making - General Principles of Public Law

10.21 In considering this Report and coming to their decision, Members should ensure that the decision is one which is rational in public law terms.

10.22 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

10.23 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

9. CONSULTATION PROCESS

- 9.1. Merton is committed to undertaking comprehensive consultation to gain the views of residents and stakeholders. This enables the Council to make informed decisions and to develop our policies.
- 9.2. Merton undertook a comprehensive consultation on the proposed emissions based parking charges, which commenced on Thursday 10th September and ended Sunday 26th October 2020. As this consultation formed part of a statutory consultation process, there were a number of legal obligations, as well as a commitment to bringing the proposals to as wide an audience as possible.
- 9.3. The Council's website provided full details of the proposal along with background papers and reports. The pages also included a section, which aimed to address frequently asked questions. An online survey was provided to gather tick box responses to prescribed questions. The response options to each question were Strongly Agree, Agree, or disagree, disagree and strongly disagree and do not know. The questions asked along with the responses are shown in Appendix 1.
- 9.4. In addition, to ensure the council could generate as much feedback as possible, representations were invited as part of the online survey, by email to a dedicated email box or by post.
- 9.5. Altogether approximately 1,600 representations were received.
- 9.6. To inform the public that the consultation was taking place the Council undertook the following:
 - Published a 1-page feature article in My Merton, which was delivered to every household within the borough in September 2020 to align with the consultation period.
 - Attended all five Community Forum meetings during the period of the consultation to discuss the proposal, give a presentation on the proposal and respond to questions and issues raised.
 - Followed the statutory TMO process of displaying notices in roads within all of the CPZ areas, on pay, display machines, and in all council owned car parks.
 - A statutory notice placed in the newspaper.

- Copies of all proposals and background papers were made available on deposit at all libraries and at the Civic Centre for public inspection/reference and included on our website for those that could not access the libraries.
 - Consulted with statutory and non-statutory consultees. Responses received are summarised were received in Appendix 2.
 - On the council's home page, we displayed a link to the consultation web pages. The web pages gave full details of the proposal along with background papers and reports. The pages also included a section, which aimed to address frequently asked questions.
- 9.7. A number of statutory bodies were consulted as part of the Traffic Management Order making process. Two responses were received from Transport for London and the Met Police and are shown in Appendix 3.
- 9.8. As part of the Emission consultation, parking services attended each of the Community Forum meetings as follows:
- Wimbledon Wednesday 23rd September
 - Colliers Wood Thursday 1st October
 - Raynes Park Thursday 6th October
 - Mitcham Thursday 8th October
 - Morden Wednesday 14th October

10. HUMAN RIGHTS, EQUALITIES AND COMMUNITY COHESION IMPLICATIONS

- 10.1. The equalities assessment EA that accompanied the report to Cabinet in March 2020, has been updated following the recent consultation process. The revised EA is attached as a separate document.
- 10.2. The 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.
- 10.3. The council believes that in accordance with the equality assessment guidance, the wide ranging consultation process, the above referenced/linked documentation, and the recent direct consultation with equality groups, that the council has met its requirement to: -
- a) Draw up a list of areas of concern. Review ways to remove or minimise negative impact/discrimination
 - b) Consult appropriate stakeholders as part of the review, in its original consultation as well as the further direct consultation undertaken with

equality groups. The EA provides full details of the consultation undertaken with Equalities Groups.

- c) Formulate an action plan to tackle issues arising from the EA.
- d) Has provided a commitment to keep the EA monitored and agreed by the Director of Environment and Regeneration and the Head of Parking
- e) The 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.
- f) A copy of the outcome of the EA will be published on the councils' website.

11. CRIME AND DISORDER IMPLICATIONS

None

12. RISK MANAGEMENT AND HEALTH AND SAFETY IMPLICATIONS

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

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

Appendix 1	Online survey - Consultation Results
Appendix 1a	Online survey responses– Geographic representation
Appendix 2	Responses from Statutory Consultees, Residents associations, Organisations and Petitions
Appendix 2a	Response from Merton Conservative Group
Appendix 2b	Response from Merton Liberal Democrat Group
Appendix 3	Council response to written representations.
Appendix 4	Map of CPZ zones
Appendix 5	Revised parking charges schedule.
Appendix 6	Number of Residential Permits sold in 2018/19 per VED Category for each Controlled Parking Zone.

ONLINE SURVEY CONSULTATION RESULTS

APPENDIX 1

Parking charges survey detailed analysis

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

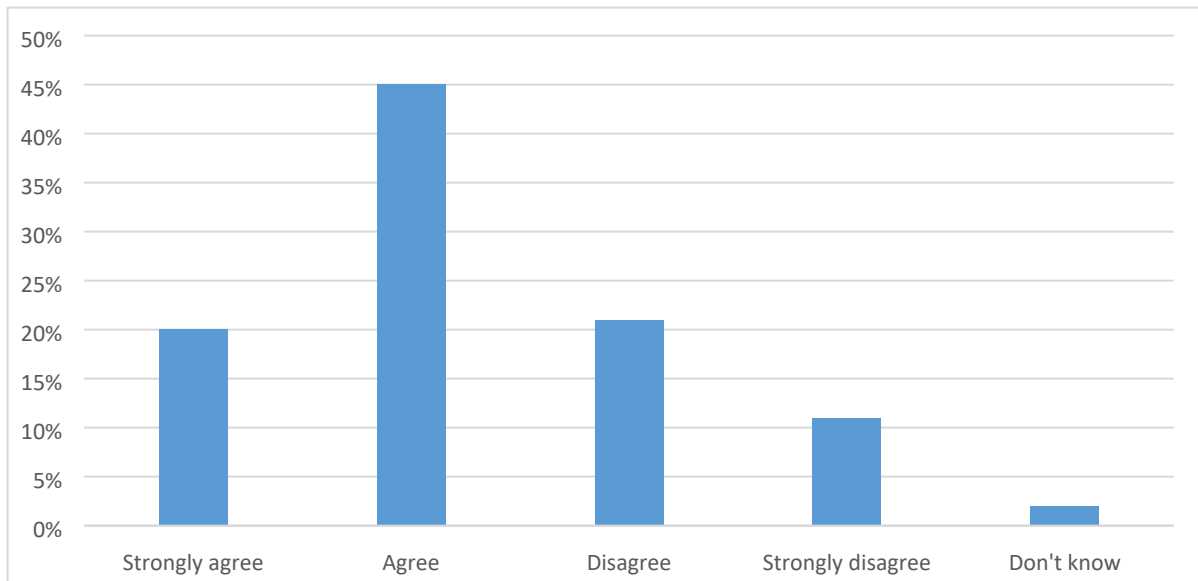
In some cases, we have drawn out a comparison from different 'groups'. This is to show if for example car owners answered the same question differently to non-car owners, the same principle applies for individuals with a disability who responded, and various age groups, etc.

SECTION 1: MERTON'S COMMITMENT TO PUBLIC HEALTH & AIR QUALITY

Summary of results for this section:

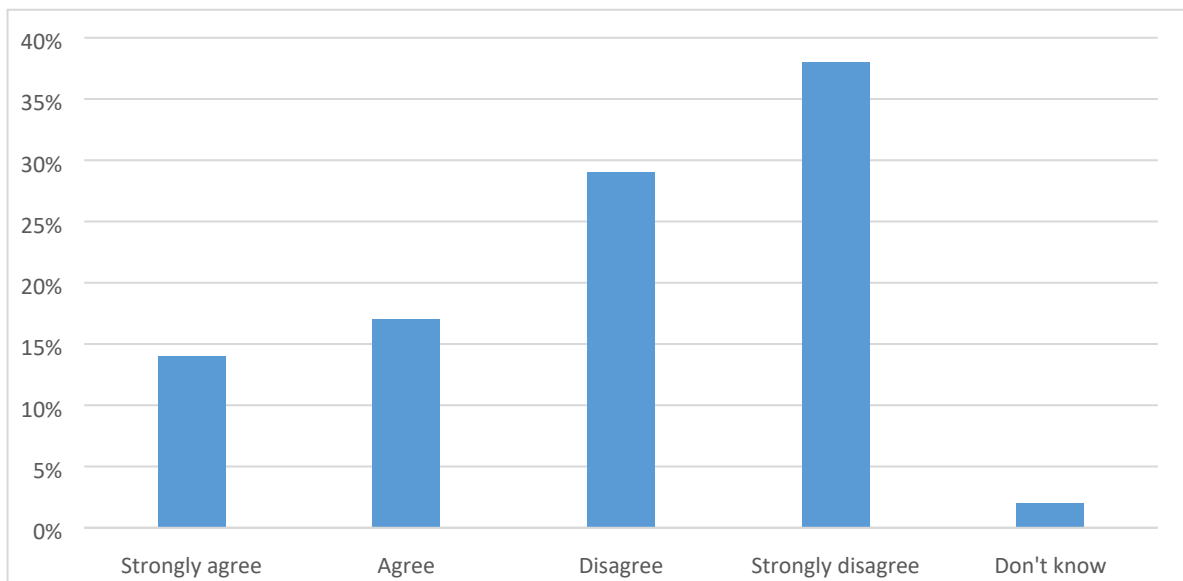
Statement	Agree	Disagree	Respondents were asked to what extent they agreed or disagreed
Merton has a key role to play in tackling the challenges to Air Quality and Climate Change we are facing	65%	32%	
Merton Council should encourage motorists towards more sustainable and active modes of transport such as walking and cycling, which contributes to improved air quality and public health	54%	34%	
Merton Council should prioritise lower polluting vehicles by offering a lower parking charge over highly polluting vehicles	35%	61%	

eed that Merton has a key role to play in tackling the challenges to Air Quality and Climate Change we are facing. There were 1,569 responses to this question.



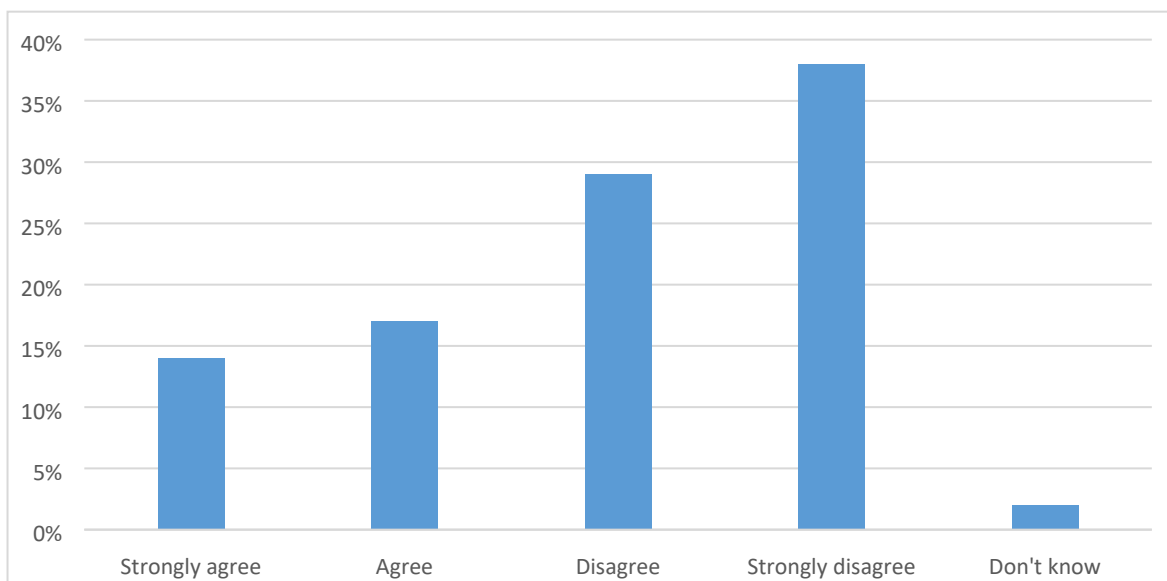
Non-car owners were much more likely to strongly agree, with half of the 94 respondents strongly agreeing. Of the 15 respondents who said they owned four or more cars in their household 33% strongly disagreed. Female respondents were also more likely to agree with 70% net agreement compared to 62% for men. Disabled respondents were more likely to disagree with 45% of the 134 disabled respondents disagreeing or strongly disagreeing.

Respondents were asked to what extent they agreed or disagreed 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.



Again, non-car owners were much more likely to agree with 43% strongly agreeing and a further 31% agreeing. Disabled respondents (134) were less likely to agree (35%) and more likely to disagree (63%).

Respondents were asked if they agreed or disagreed that Merton Council should prioritise lower polluting vehicles by offering a lower parking charge over highly polluting vehicles.



Non-car owners were more likely to agree with 40% strongly agreeing and 26% agreeing.

Section 2 Travelling in Merton

Driving was the most popular mode of transport for respondents. These were the top five modes of transport.

Mode	%
As a driver of a car	42%
Walk	32%
Bicycle	8%
Bus	6%
Train	3%

Nearly all respondents were in households that owned a car.

Number of cars owned by household	%
0	6%
1	66%
2	23%
3	3%
4+	1%

Amongst car owners the majority owned combustion engine vehicles.

Response	Number of Respondents	Percentage of Respondents
Petrol	931	64%
Diesel	428	29%
Hybrid	79	5%
Full Electric	28	2%

Amongst car owners most respondents used their vehicle on a regular basis.

Response	Number of Respondents	Percentage of Respondents
Most days	497	34%
Weekly	506	35%
Occasionally	324	22%
Rarely	123	8%
Never	7	Less than 1%

The majority of respondents who drive do so for social or shopping reasons rather than commuting.

Response	Number of Respondents	Percentage of Respondents
Social or leisure activities	413	29%
Shopping	392	28%
Commuting to work	193	14%
Other	159	11%
To drop off or collect a child from school	136	10%
In the course of work / business	124	9%

When parking at home most respondents said they park in a controlled parking zone.

Response	Number of Respondents	Percentage of Respondents
In a marked on-street bay in a Controlled Parking Zone	929	64%
Privately owned off street parking	415	27%
On street (no parking restrictions)	79	5%
Other	14	1%
Not applicable	10	1%
In a public car park	2	Less than 1%

Whilst two thirds of respondents with a car said they did not park at work most of those who do park at work do so in privately owned facilities.

Response	Number of Respondents	Percentage of Respondents
Not applicable	823	66%
Privately owned off street parking	183	15%
In a marked on-street bay in a Controlled Parking Zone	94	8%
In a public car park	58	5%
On street (no parking restrictions)	50	4%
Other	36	3%

When parking for leisure/retail purposes car parks were the most popular choice for respondents.

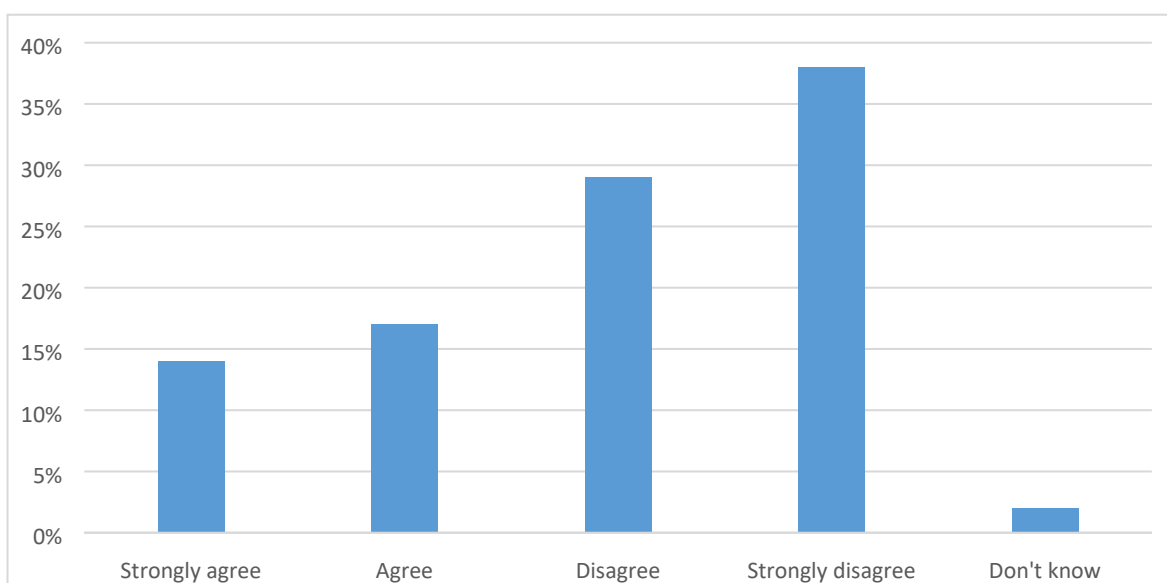
Response	Number of Respondents	Percentage of Respondents
In a public car park	597	47%
Privately owned off street parking	238	19%
In a marked on-street bay in a Controlled Parking Zone	167	13%
Not applicable	161	13%
On street (no parking restrictions)	66	5%
Other	45	4%

For those visiting or caring for friends and family on-street parking options were the most frequently selected.

Response	Number of Respondents	Percentage of Respondents
In a marked on-street bay in a Controlled Parking Zone	367	29%
On street (no parking restrictions)	360	28%
Not applicable	249	19%
Privately owned off street parking	238	19%
In a public car park	16	1%
Other	53	4%

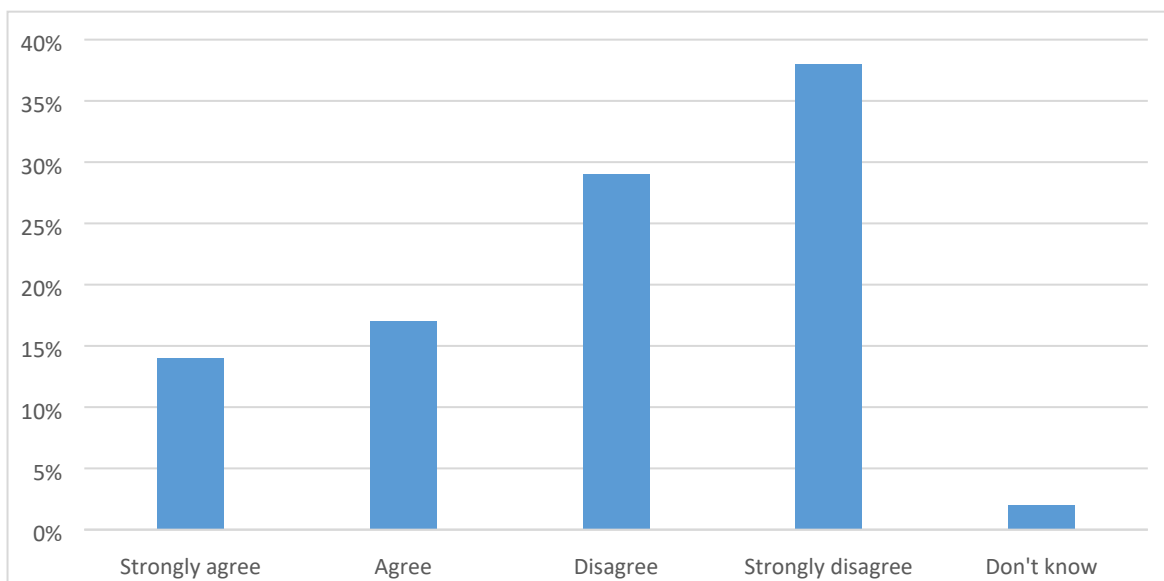
Section 3 Emission based parking charges

Respondents were asked to what extent they agreed with statements that set out the proposed introduction of emission based charging. Firstly if parking permit charges in Merton should be linked to CO2 and NOx emissions levels of the vehicle where a quarter of respondents agreed and nearly three-quarters disagreed.



Non-car owners were more likely to agree with 39% strongly agreeing and 22% agreeing.

Respondents were also asked if they agreed that higher polluting vehicles which do not meet ULEZ standards, should pay a supplement in car parks and at pay and display locations with just under a third agreeing and two-thirds disagreeing.



As before non-car owners were more likely to agree with 37% strongly agreeing, and 25% agreeing.

Asked to what extent they agree that the proposed charges have been set at a level which will help achieve the objectives to encourage active travel and sustainable transport, encourage drivers to change to less polluting vehicles and help reduce congestion and air pollution responses for each charging area are set out below.

Charging area	Agree	Disagree
On-street parking	19%	72%
Car parks	22%	65%
Residents permits	16%	78%
Car park season tickets	21%	59%

Respondents were asked how likely the proposed scheme would be to change their behaviour in the following aspects.

Behaviour	Likely	Unlikely
Reduce the journeys I make by car	11%	84%
Increase the journeys I make by active travel modes (walking and cycling)	13%	81%
Get rid of a vehicle altogether	5%	88%
Change my vehicle for one with lower emissions	14%	77%
Purchase a fully electric vehicle	10%	82%

Respondents were then asked about the importance of other measures to support sustainable travel choices

Action	Important	Unimportant
Better cycle lanes and routes	62%	36%
Better pedestrian routes and facilities including footpaths, lighting and crossings	74%	26%
More secure cycle parking	62%	33%
Better public transport	84%	15%
More availability of car clubs	32%	60%
More Electric Vehicle Charging points	57%	37%

SECTION 4 ABOUT YOU

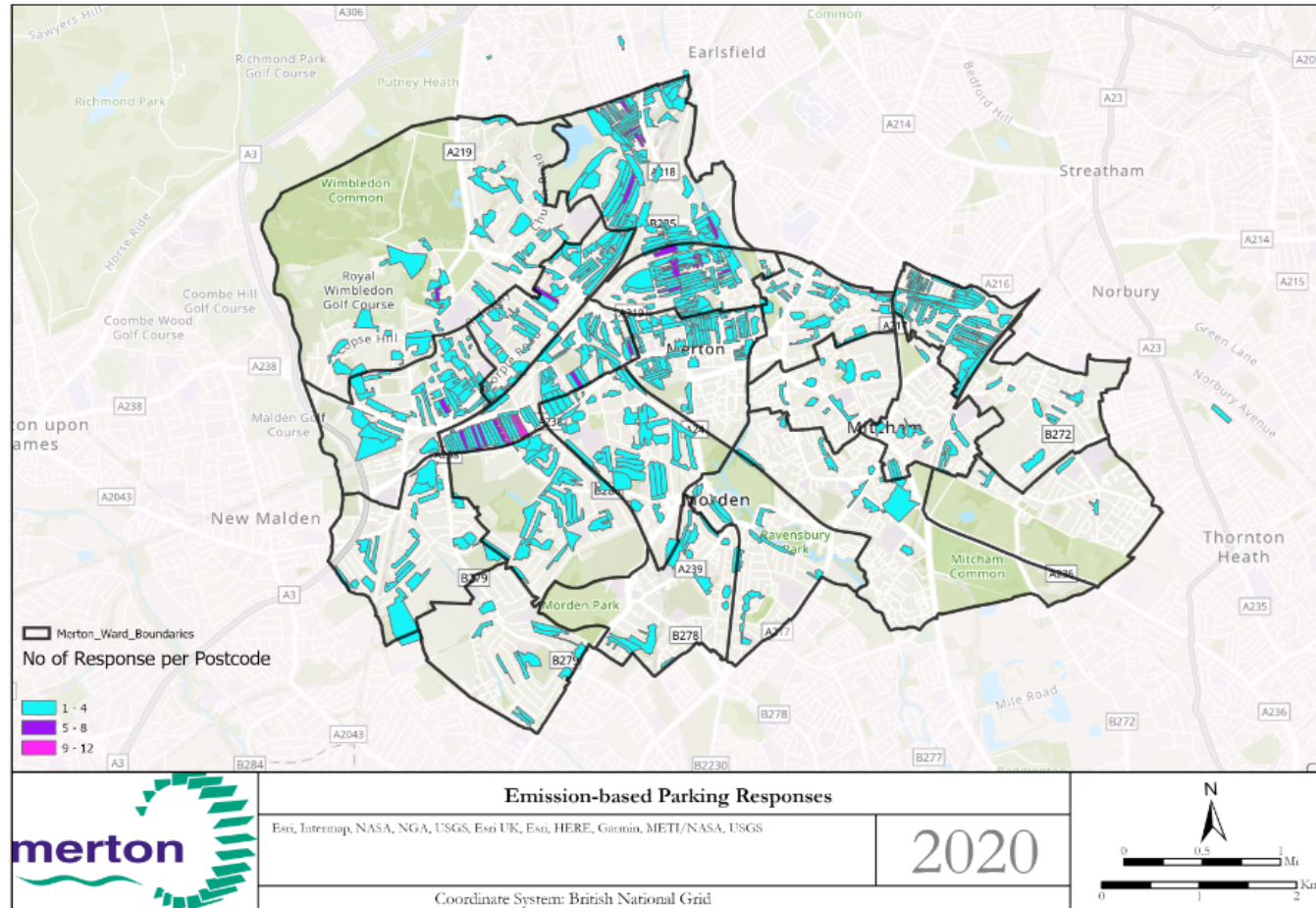
There were slightly more male than female respondents (51% to 49%); 10% said they considered themselves disabled; more than half respondents (53%) were aged 35-54; and 74% said they were white British.

Online survey – Geographic representation

Appendix 1a

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

Page 56



Appendix 2

REPRESENTATIONS FROM STATUTORY BODIES, ORGANISATIONS AND PETITIONS.

STATUTORY CONSULTTEES

There were two responses; the Metropolitan Police and Transport for London (TfL) and their comments are as follows:

Metropolitan Police – have no objection or observation to add with regard to the proposals.

TfL – TfL welcome the approach proposed and in particular the recognition that the appropriate management of car parking can have wider benefits in terms of mode shift, reduced air quality and carbon emissions and public health. This fits well with the Mayor's Transport Strategy and with the current approach set out in the Street space for London programme.

In addition, there was a positive response to the varying charges based on location (including the extent of public transport alternatives) and on vehicle emissions. The proposal to replace the diesel levy with a surcharge based on ULEZ compliance is supported: this is a more nuanced approach and has the benefit of using a pre-existing standard, making it more understandable to the public. TfL support the proposal and believe it is appropriate given the significant impacts private vehicles can have, particularly those with high emissions travelling through relatively densely populated urban areas. The charge for electric vehicles achieves an appropriate balance between incentivizing drivers to switch from conventionally-fueled cars, while reflecting the fact that these vehicles still take up road space and produce non-exhaust emissions. Additionally, we recognise permits have an administration cost for the council.

EMISSIONS BASED PARKING CHARGES PETITION

A petition was submitted to the Council with approximately 1400 signatories. The petition stated:

“We the undersigned call on Merton Council not to impose emissions-based parking charges throughout the borough.

Further, we ask that Merton Council work with residents and develop a fair system for parking charges which does not penalise motorists, many of whom do not have an option to walk, cycle, or use public transport in the current climate.”

THE WIMBLEDON EAST HILLSIDE RESIDENT ASSOCIATION (WEHRA)

WEHRA objects to the proposal on three grounds; fairness, effectiveness and timing as follows:

Fairness – CPZs were set up to control congestion etc. and at an agreed cost of just covering operational costs. Only vehicles in the controlled parking zones and these are only in certain areas of Merton yet all vehicles have emissions. The significant increase proposed in visitor permits will impact on the elderly, infirm etc.

Effectiveness – the objective of the proposal is to improve air quality but no evidence has been produced. Most of the time vehicles are parked and therefore not producing emissions. Concern that the proposal does not cover emissions from flights, buses and HGVs.

Timing – ULEZ good if applied to all vehicles in Merton. However, many need a vehicle, we are living in a global pandemic, recently had a significant increase in parking charges, owners need time to replace vehicles, electric vehicles still being developed, the support infrastructure is not adequate with limited charging points and car clubs are volatile, plus expensive. In addition, there has been no opportunity to review the impact of the recent parking charges increase.

Overall support the need to improve air quality but in an effective manner and one that is fair to all parties/residents in Merton.

THE BELVEDERE RESIDENT ASSOCIATION

Concerns were raised about a number of issues such as parking charges were increased significantly recently, only controlled parking zones affected and it is a tax that only affects residents in certain areas. Particular concern regarding visitor permits, the increased cost and how residents would know what the emission is of the vehicles driven by their visitors.

Some cars are only used infrequently, many residents are dependent on their vehicles, such as the elderly who cannot afford to replace them and do not drive often. Being encouraged to not use public transport and the financial impact of Covid is having a big impact, so the council should be supporting residents.

APOSTLES RESIDENT ASSOCIATION

Object to this increase a) because this additional tax does not apply to those with their own driveway or who live in a non-CPZ area and b) because the CPZ charges (we were told) were about paying the Council for managing the parking arrangements and not to be used as a tax.

RAYNES PARK ASSOCIATION

A number of concerns regarding the impact on businesses in the area. In terms of the characteristics of the borough as a business location, employers in the Raynes Park area are more likely to identify parking as a particular constraint relative to businesses elsewhere. As a result, there needs to be a plan that supports the area, particularly the High street. We conclude that rather than the suggested increases in parking charges in our town centre, there should be a consideration to reducing charges and indeed introducing a longer, say 30 minutes, period of free parking on both the north and south parts of Raynes Park. This would indeed encourage more people to make use of our high streets and thus stimulate economic growth much needed.

COMMUNITY FORUMS

As part of the Emission consultation, parking services attended each of the Community Forum meetings as follows:

- Wimbledon Wednesday 23rd September
- Colliers Wood Thursday 1st October
- Raynes Park Thursday 6th October
- Mitcham Thursday 8th October
- Morden Wednesday 14th October

Community Forum meetings are for anyone with an interest in the local area. They are chaired by local councillors. Issues raised are referred to the responsible organisation to follow up and report back on how problems are resolved. The Director of Environment & Regeneration, Chris Lee gave an overall introduction to our Emissions based proposal and then the Head of Parking Services, Ben Stephens took the forum through a presentation of the Emissions based proposal. Councillor Martin Whelton, Cabinet Member for Regeneration, Housing and Transport, attended some of the Forums and thanked everyone for their contribution and summed up the discussion. He said that Merton wants to improve air quality and make sure the scheme is fairer. The scheme will be a success if fewer people have cars on the road. Cllr Whelton encouraged responses to the consultation and these will be considered by Scrutiny and the Cabinet.

Following the presentation, the attendees at each community forum could raise any questions, concerns and issues. A sample of the questions and points raised are shown below, which are all addressed in the body of this report.

- Residents said they felt this proposal was unfair to people who don't drive regularly or who cannot afford to change cars.
- A resident said Motability only has a small choice of low emission vehicles, and asked if this was taken into account in equalities impact assessment.

- A resident asked if they can vote to remove CPZ or to change operating times.
- It was mentioned a policy would hit local motorists parking on street but there are not enough incentives to move to electric vehicles.
- A resident asked if this just going to penalise poor or elderly residents who cannot afford to buy newer cars.
- A resident asked if any additional income would be spent on improving roads.
- It was mentioned that emission taxes should be fairly applied but this discriminates against CPZ areas, would it be possible to put all areas into a CPZ and then only charge the emissions element

Merton Conservatives oppose the introduction of the emission based parking charges scheme. This is the second time in 18 months that Merton Council has introduced a new tax focused on Wimbledon and Raynes Park under the guise of an air quality measure. When taken with the charging increase last year, some residents will have seen an increase from £65 to £150, and now to £690 over the course of a few years.

The council was never able to produce any conclusive evidence that increasing the price of CPZ permits and other parking charges in 2019 would improve air quality, instead choosing to rely on spurious nudge theory, and irrelevant out of date studies to attempt to justify its tax grab on Wimbledon. It is hardly surprising that evidence from the 2019 parking charges tax hike has not been included in the evidence base to justify this latest tax on Wimbledon. After all, if last year's parking charges increase had actually improved air quality then this new emission based charging scheme would clearly be unnecessary.

The Labour administration claims, for the second year in a row, that this new money making scheme is necessary to improve air quality, and from the lack of action on any other air quality improvement schemes; most notably the low emission bus zones which was voted through council in February 2019, it clearly is not pursuing any other options. The Labour administration has a clear record at the previous two budget council meetings of voting against air quality improvement measures that could have made an immediate impact in combating the pollution crisis in Merton.

This lack of action has stripped this administration of all credibility on the issue of improving air quality.

It is a shame that the administration cannot be honest with local residents about the true nature of these proposals. The emission based charges scheme is simply a tax on the parts of the borough that do not vote for the Labour party, and forms a major part of the council's anti-car agenda. It will have no discernible effect on improving air quality, as has the previous tax hike on Wimbledon that was dressed up as an air quality measure.

We find it deeply concerning that the council's own equality analysis recognises that this new tax could have a negative impact on the disabled, the elderly, and those on low incomes. Residents have been constantly misled over the reason and cost of permits by the Labour administration. Most were told it was to limit commuter parking, with the fees set only to administer and enforce commuter restrictions, and not as a method to fill the council's accounts. The repeated price hikes have been deeply unfair on residents who now feel betrayed.

This new tax hike has come at the worst possible time for many residents across the borough. While many are facing job losses, stretched household budgets and an uncertain financial future due to the Covid19 pandemic, the Labour administration has chosen to put residents under the cosh with a series of new charges that fall on residents at the most financially difficult time many families will have experienced for decades.

This latest tax is clearly the wrong approach to reducing pollution and emissions in the borough, and will disproportionately burden the elderly, the disabled, and those on low incomes. We call on the Labour administration to bring in practical workable solutions, and not to resort to another tax on local residents that will not improve air quality in Merton.

Merton Liberal Democrats believe the Council should be using its powers to encourage residents to use cars less, and switch to less polluting vehicles where possible. However, we do not believe that the current proposals from the Council will be effective in doing this. Instead they appear to have been designed to raise revenue, and to do so in a way which in our opinion still (following the 2019/2020 increases) penalises parts of the Borough that don't tend to return Labour councilors. We need an integrated plan which will:

- Encourage Merton residents to walk, cycle and use public transport more
- Encourage residents to shift to less polluting vehicles and provide them with support to do so
- Recognise that many residents will continue to need to use cars and that some will have low mileage

As we mentioned in our 2019 consultation response, a key factor is providing real, practical help to enable residents to switch to greener transport options. We set out some ideas towards this in our consultation response. If an emissions-based model is to be used, these proposals must be tested and shaped using evidence from the Council's review of the diesel levy and emissions based charges, and learning lessons from similar schemes adopted by other London Boroughs.

We have also encouraged hundreds of residents to complete the consultation directly.

Question 1

To what extent do you agree or disagree with the following statements?

a) Merton has a key role to play in tackling the challenges to Air Quality and Climate Change we are facing

Response: Strongly agree

Comment: We suspect that few would disagree with this. Nonetheless, it clearly doesn't follow that because the Council should do something, it must do what's currently being proposed by the administration.

b) 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

Response: Agree

Comment: Parking charges policy cannot legally be a revenue raising strategy. While we agree that the Council has a key role to play in encouraging people to use sustainable and active modes of transport, it's clear that some residents will need help switching to greener transport options.

c) Merton Council should prioritise lower polluting vehicles by offering a lower parking charge over highly polluting vehicles

Response: Agree

Comment: Encouraging residents to change to less polluting vehicles should clearly be prioritised, but (as for 1b above) we recognise that some residents will need help switching to greener transport options. This is especially true for those who bought diesel vehicles on the understanding that they were more environmentally friendly, based on Government advice. We also believe that “lower polluting vehicles” could and should include all those vehicles that are rarely used (as it’s the driving that causes the pollution) and this should be reflected in the proposals.

If the aim of the proposals is not simply to raise revenue, there are other forms of action that the Council could use to help encourage the purchase of lower polluting vehicles beyond simply the application of higher or lower parking charges. For example, scrappage schemes for older vehicles, or 'Sunrise and sunset provisions' to give residents time and a deadline to change their vehicle i.e. only applying emissions-based charges to new applications (and their subsequent renewals) for residents parking permits.

We feel that an Air Quality Scrutiny Champion, as we proposed in the Council meeting on 6th February 2019, would improve the focus, monitoring and implementation of Merton’s air quality action plan.

Questions 2-7 and 10

These have not been answered as they are about individual travel activities and not appropriate for a response from an organisation/group.

Question 8

To what extent do you agree or disagree with the proposal to introduce the following?

- a) Parking permit charges in Merton should be linked to CO2 and NOx emissions levels of the vehicle*

- b) Higher polluting vehicles which do not meet ULEZ standards, should pay a supplement in car parks and at pay and display locations*

Comment: The aim of any changes should be to encourage residents to change their vehicles to low polluting ones, to reduce carbon emissions and improve air quality. Therefore, the focus should not be whether one supports particular charges on particular types of vehicles. There is little in these proposals which will do that.

Any change should:

- Focus on the benefit it brings to the borough in terms of improved air quality and reduced carbon emissions – ideally with targets to enable measurement

- Treat vehicles the same, regardless of where they are parked - i.e. not charge a different amount on an identical vehicle in different parts of the Borough
- Offer a discount for vehicles which are not driven very much. Many residents feel they need to have a car but don't use them very much – anecdotally particularly older residents. Cars which are not driven are not producing pollution, and any charging system should recognise this.
- Additional money raised by the changes should be earmarked for the Council's climate emergency response, or air quality improvements

We feel that the administration's current proposals have been designed to raise revenue – and to raise it largely from the parts of the Borough that tend not to elect Labour councilors. This has led to a hugely complicated scheme with charges depending on location, the hours the CPZ is in operation as well as the vehicle's CO2 and NOx emissions and whether it meets ULEZ standards. This won't help residents understand the best vehicles to switch to when they are changing their vehicles.

Question 9

To what extent do you agree or disagree that the proposed charges have been set at a level which will help achieve the objectives to encourage active travel and sustainable transport, encourage drivers to change to less polluting vehicles and help reduce congestion and air pollution.

- *On-street parking*
- *Car parks*
- *Residents permits*
- *Car park season tickets*

Response: Disagree

Comment: The administration quotes the success of ULEZ as evidence that the measures they're bringing forward will have the effects outlined above.

However, the scheme proposed is completely different to that.

As such, we do not agree that the charges outlined have been set to help achieve these objectives but rather to increase revenue. Although not listed here, the proposals around visitor permits seem particularly unlikely to result in an increase in active travel, a reduction in congestion or an improvement in air quality.

Question 11

An emission based charging scheme is only one part of the actions we can take to encourage more sustainable and active travel. We are interested in your views about other options to support this objective. How important do you think the following measures are to support sustainable travel choices?

- *Better cycle lanes and routes*
- *Better pedestrian routes and facilities including footpaths, lighting and crossings.*
- *More secure cycle parking*
- *Better public transport*
- *More availability of car clubs*
- *More Electric Vehicle charging points*

Response: very important

Comment: All of these are important and should be part of an integrated plan to encourage more sustainable and active travel. We note particularly that EVCPs tend to be installed at the request of the supplier, rather than any overall strategy being applied.

Question 12

Please tell us if you have any other comments about the proposal to implement emission based charging or would like to provide any formal representation.

Comment: Further to all the comments relating to specific questions above: Merton is proposing a hugely complicated scheme that we feel will have little effect on reducing pollution/improving air quality, and which we are concerned has been designed solely with the objective of increasing revenue. Part of this is because there is no effort to set targets for improvement against which the scheme could be measured.

There is no logic in saying that a polluting vehicle should be charged less in some part of the Borough than others, nor in assuming that the response of car owners will be to instantly change their vehicle. Equally, the more complex the scheme the less likely it is to change behaviour.

In order to be effective in encouraging residents to change their vehicles there should (ideally) be a scrappage scheme, and residents should be given an appropriate amount of time to switch their vehicle. Sunrise and sunset clauses should be used to manage this, with the new charges only being brought in gradually for existing permits, with the full rate only applying to permits for vehicles acquired after the scheme is in operation. We would also like to see residents being given the opportunity to give up their right to a permit in exchange for free membership of a car club. Online tools should be developed to enable residents to quickly determine the charges applied to any particular vehicle.

Visitor Permits

There doesn't seem any logical mechanism by which charging someone based on the type of car their visitor arrives in will result in improved air quality or fewer carbon emissions. As such we question whether it's genuinely possible to apply these principles to visitor permits.

Furthermore, whilst we understand that the scratch cards and annual visitor permits are essentially legacy and will be phased out, we make the following comments in relation to the interim measures applied to these.

There is a very substantial increase in the price of visitor permits for which no real justification is given. Residents who need/continue to use scratch cards are being charged enormous increases. For example, in zones where the scratch cards are currently £5 a day, it is being increased to £8.50, in those where it is £2 it is going to £5.50. It will most strongly affected those residents not able to buy permits through RingGo.

Similarly, there are enormous increases in the charges for annual visitor permits – doubling the charge in some cases by charging the same as for the highest polluting vehicle in the most expensive CPZ. Again no real justification is given for this (we feel it should be possible to look at other ways to prevent people ‘gaming’ the system and using a visitors permit for their car by for example banning a visitor permit being used in respect of any car registered to anyone living in the address to which the visitor permit is issued). We also feel that there could be equality impacts (see below).

Equality Impact

We understand that the Council holds no demographic data on who purchases annual visitor permits. As such it’s impossible to determine if an appropriate Equality Impact Assessment has been carried out. There will be similar issues relating to the move from scratch cards for day/half day visitor permits, and those who use any new system through RingGo.

Although not a protected status, Merton usually looks at socio-economic status as part of its EIA and yet by their nature, these proposals affect those who have no off-street parking more than those who do. Although a broad characterisation, smaller, cheaper housing is less likely to have off street parking.

Similarly, it was only at the request of the Sustainable Communities Panel (and only reluctantly by that Panel, with administration councilors abstaining on the point) that the distribution of vehicle age across the borough was looked at. The administration regularly uses the east and west of the borough as a proxy for socio-economic status (“bridging the gap”) and yet it hadn’t looked at this evidence as a starting point of the impact of their proposals – i.e. if more older, and thereby heavier polluting, vehicles were in the east of the borough, these proposals might impact socio-economic status negatively.

A more general criticism of the Council’s approach to Equality Impact Assessment in the field of parking charges is it tends to assume that the measures taken will necessarily improve air quality/ reduce carbon emissions. This thereby automatically gives a positive Equality Impact Assessment. We contend this is the wrong way to approach the EIA. It cannot be a starting point when looking at the impact and any necessary mitigation, that the measures proposed will have the positive affects wished for. This, in our opinion,

skews the Assessment in the favour of making the changes, and robs the process of any real effectiveness.

RESPONSES TO WRITTEN REPRESENTATIONS

Appendix 3

PERMIT CHARGES

The section below addresses the majority of points raised in the consultation.

Rational/Principals of scheme	
<p>Do not support proposal</p> <p>A large number of comments stated that they do not support the proposals.</p> <p>Council response:</p> <p>The opposition to the proposal is noted.</p>	<p>136 comments</p>
<p>Do support proposal</p> <p>A number of comments stated that they do support the proposals. It should be noted that a number of these responses stated that they supported the objectives and aims of proposal but felt the proposed increase was too high.</p> <p>Council response:</p> <p>The support for the proposal is noted. The level of the charges will have an impact on the effectiveness of the scheme and have been set at the proposed levels in order will achieve the objectives to reduce car ownership and use.</p>	<p>79 comments</p>
<p>Dropped kerb properties unaffected</p> <p>There were a number of comments received highlighting that it was unfair that residents in CPZ areas who have private driveways were not affected by the current system or the proposed changes.</p> <p>Council response:</p> <p>It is recognised that the current proposals will not address all car use in Merton, but the Council does not have the powers to impose charges on private parking facilities.</p> <p>Part of the justification for parking charges is to cover the administration, enforcement and maintenance of the CPZ areas. Residents with private drives that do not use CPZ bays wouldn't be expected to meet this operating cost. In addition, cars parked off street do not contribute towards the specific problems associated with on street parking dominance.</p> <p>Owners of properties with off street parking do have to meet the associated costs of parking themselves including through ongoing maintenance and cost premiums of up to 10% (citation) to purchase properties with parking facilities. The costs of installing a driveway and dropped kerb are substantial and many times higher than the cost of an annual permit.</p>	<p>225 comments</p>
<p>Only penalising those in CPZs</p>	<p>144 comments</p>

A large number of respondents felt that it was unfair that the proposals only affected areas with CPZs and felt that to be effective the policy should be implemented borough wide.

Council response:

It is recognised that the current proposals will not address all car users in Merton, but it is not possible for the Council to implement a scheme that achieves this. The proposal will still apply to approximately 30% of vehicles in the borough so has the potential to make a valuable contribution to our transport objectives.

CPZs were implemented to ensure residents had priority access to parking space in response to excessive demand, often from vehicles from outside the area. The CPZs are therefore often in proximity to demand generators such as town centres and transport hubs that people would wish to drive to. For this reason, CPZ areas tend to have better transport accessibility than other parts of the borough, so residents will have better sustainable alternatives transport options available to them.

It should also be noted that any cars from non CPZ areas driving to destination and parking in the Council's car parks or pay and display bays will still be affected by the relevant aspects of the proposals, so it may influence them to drive less within the borough.

Parked cars do no pollute

121 comments

A number of respondents felt that the proposal was unfair because parked cars do not pollute so it penalises people that only used their car occasionally.

Council response:

Infrequently used cars parked on street do cause transport problems by creating streets that are dominated by cars and take up space that can be used for sustainable transport schemes such as cycle lanes and cycle parking. There is also evidence that excess parking demand leading to lack of available spaces and cruising for parking which causes inconvenience for other residents and adds to congestion and air pollution.

Once residents have invested in the upfront cost of owning a car they will be much more likely to use it, even for short trips. Data from TfL (Travel Demand Report 12) demonstrates that those with a car drive a lot more than those with no car and households with 2 cars drive even more. This supports the Council's objective to encourage residents to reduce their vehicle ownership.

Car clubs give residents the option of using a car occasionally on a pay as you go basis, without the hassle of owning a car. Merton has a network of up to 60 car club vehicles mainly located within the CPZ areas in the borough.

Incentivise not penalise motorists

210 comments

A large number of respondents commented that the Council should follow an approach of incentivising sustainable transport options instead of punishing car drivers.

Council response:

Merton's Transport Strategy (LIP 3) sets out a range of policies that the Council will implement in conjunction with TfL to support sustainable transport choices. Merton benefits from relatively good access to public transport, with the borough served by 10 mainline rail stations, London Underground services, tram link and a network of 28 bus routes. Over the last 6 years, Merton Council has spent £19.2m on sustainable transport schemes to encourage and support cycling and walking. These include physical infrastructure such as pedestrian crossings and cycle routes; and supporting measures such as cycle training and

school travel plans. Approximately 6 km of cycle routes that have been delivered alongside hundreds of additional cycle parking spaces.

However, use of sustainable transport has been falling in Merton over recent years, so it appears that the sustainable transport measures implemented are not sufficient on their own and that more robust measures are also required to achieve the required modal shift. 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 mode shift will likely be limited to well below the levels required to achieve transport objectives.

In response to this consultation responses, it is proposed that the Council enhance the scheme by introducing measures to offer some direct sustainable transport incentives to residents to give up a parking permit.

Introduce toll roads/ extend congestion charge

56 comments

A number of representations suggested the introduction of toll roads or road pricing schemes and also suggested the expansion of the congestion and ULEZ zones to cover Merton.

Council response:

It is not currently feasible for the Council to implement a system such as road pricing or congestion charging outside of a national or regional scheme. At the current time, the only realistic option for the Council to try to influence car use is through the management of the parking spaces it controls.

Doesn't address through traffic

91 comments

A number of representations highlighted that the proposals do not target through traffic which adds to congestion and emissions.

Council response:

It is recognised that the current proposals will not address all car use in Merton, but there is no feasible way for the Council to implement a system such as road pricing which would achieve this. At the current time, the only realistic option for the Council to try to influence car use is through the management of the parking spaces it controls. It should be noted that any cars driving into the borough and parking in Council controlled parking spaces will also be affected by the proposals.

Government said buy diesel/scrap scheme

103 comments

Some comments noted the fact the public had previously been encouraged by the government to buy diesel cars as evidence then indicated they were better for the environment. For this reason, many felt that the proposals unfairly targeted diesel cars and some were also wary of similar current advice regarding electric vehicles.

Council response:

In 2001, excise duty (VED) system was introduced which made road tax charges cheaper for vehicles, which emitted less CO2 emissions. However, despite diesel cars emitting less CO2, they do produce disproportionately high emissions of nitrogen dioxides (NOx) and particulates, both of which contribute greatly to local pollution levels and poor air quality.

<p>Although an element of the proposals is based on VED bands, the ULEZ supplementary charge element of the proposed parking charges, is aimed at also targeting vehicles that emit a high level of the pollutants that contribute towards air pollution, including older diesel vehicles.</p> <p>Merton Council acknowledges that previous governments encouraged the uptake of diesel vehicles to help reduce carbon emissions and that this advice has now changed. The Council is in agreement with current government approach in relation to phasing out the use of petrol and diesel cars and encouraging uptake of electric vehicles.</p>	
<p>Negative impact on High Street</p> <p>A number of responses highlighted the impact of increased parking charges on high streets.</p> <p>Council response:</p> <p>The impact of online shopping has changed the dynamics of the high street and closures of familiar chains and primary department stores continue to be a concern for our high streets. It should be noted that this trend was happening even with no significant increase in charges for approximately 10 years and despite the introduction of 20-minute free bays. The trend also appears to have been further accelerated by the recent Covid-19 crisis.</p> <p>In a study of three different UK town centres, no systematic relationship was found between levels and convenience of parking provision and economic performance. A recent report by TfL (November 2018) also demonstrated that public realm improvements and schemes that support walking and cycling bring economic benefits and can increase retail sales by 30%.</p> <p>High Streets that are dominated by large volumes of fast traffic, such as Wimbledon High Street and Morden are less likely to be considered pleasant destinations for shopping and leisure. It is interesting to, compare with nearby centres such as Kingston and Croydon that have high parking charges but are still very successful.</p>	<p>50 comments</p>
<p>Does not address the issue of air quality / counterproductive</p> <p>Some respondents felt that the proposal did not address the issue of air quality as vehicle emission was only one reason for the air quality. If residents were paying such high costs they would use the car more than they currently did to ensure value for money which was counterproductive to the aims of the proposal.</p> <p>Council response:</p> <p>Pollution concentrations in Merton continue to breach the legally binding air quality limits for both Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀). The air quality-monitoring network, run by Merton, has shown that the UK annual mean NO₂ objective (40µg/m³) continues to be breached at a number of locations across the borough including Colliers Wood, Morden, Tooting and South Wimbledon. Poor air quality in Merton comes from a number of sources, but our legal exceedances are almost entirely due to road transport. Road transport accounts for approximately 60% of emissions of NO₂ in our Borough.</p> <p>Once residents have purchased a permit for an annual upfront fee they will be more likely to drive more often because they have a vehicle available to use and these proposals are designed to address this. However, the Council is not aware of any evidence that shows that once purchased, people will drive more depending on the level of the fee that was paid.</p>	<p>116 comments</p>
<p>Size of car</p>	<p>115 comments</p>

A high number of respondents raised the problems associated with larger vehicles such as SUVs that may not necessarily be in the highest emissions band so not affected by these proposals.

Council response:

It is recognised that the increasing size of domestic vehicles have wider transport impacts by taking up more road and parking space. They can also have a detrimental impact on road safety by reducing visibility for and of other road users' particularly vulnerable road users such as cyclists and pedestrians.

However, it is not considered feasible for the Council to introduce parking charges based on the size of a vehicle. But there is often a correlation between the size of the vehicle and emissions, which means that these larger vehicles will be more likely to be affected by the higher charges.

How will emissions be known?

21 comments

Some respondents were concerned about how they would know the emission base of their own vehicle or their visitor's vehicles (including tradespeople).

Council response:

The proposal will enable the emissions to be worked out automatically when entering the vehicle registration number into the RingGo payment app. This applies to both residents purchasing annual permits and visitors purchasing e-permits via the RingGo app. It will not be possible for emissions to be worked out for annual visitors permit or visitor scratch cards, which is why it is proposed for the charge for these to be based on an assumption of the highest emissions. Customers using pay and display bays can also use the RingGo app which will work out their emission and it is proposed that 100 of the most frequently used pay and display machines in CPZs will be converted to able to work out a customer's emissions.

Removal/ amendment of CPZs

A number of comments at resident's forums asked if it would be possible to remove Controlled Parking Zones (CPZs) if residents no longer wanted them because the costs had become too high. Questions were also asked about whether it would be possible to amend the hours of the CPZ to reduce charges.

Council response:

CPZs are introduced in response to demand from residents to manage parking to alleviate pressure from parking from non-residents. This is why CPZs tend to be located around trip generators such as town centres, stations, hospitals, educational establishments or leisure facilities. Before being implemented a consultation is conducted with local residents to establish support for the scheme. On the same basis, it would be possible for local residents to seek a consultation on removal or amendment of a CPZ. However, residents should be aware that this may result in an increased parking demand that puts pressure on the availability of residential spaces.

Residents could also request a consultation to reduce the operational hours of the CPZ with the aim of still deterring day long commuters whilst reducing cost. However, in some areas this could still lead to increased short stay use of resident parking bays for shopping or leisure. The difference between short and long term enforcement is only a maximum of £40 per year or 10 pence per day to residents, so they would have to assess if that cost saving was worth the inconvenience and increased local traffic and air pollution.

Finance/ Timing

Revenue generator

516 comments

A large number of the respondents felt that the main purpose of the proposals was to generate income and some questioned what parking revenue is spent on. In addition, they were concerned that the charges when the CPZ was set up were initially just to cover costs but now appeared to be used to raise revenue

Council response:

The primary objective of the proposals is to set pricing signals that incentivise residents to reduce their use and ownership of cars or to consider switching to a lower emission model. It should be noted that as the proposals achieve these objectives and residents change their travel choices, the Council will begin to lose revenue.

However, in the short term, the proposals are projected to generate an additional surplus. The council can only spend the money it receives from parking charges in the manner set out in the Road Traffic Regulation Act 1984 (RTRA) which directs that income cannot be used for general Council expenditure. The RTRA only allows authorities to spend surplus income on the day-to-day management of the parking service and transport and environmental related expenditure. Part of any surplus generated by these proposals will be reinvested directly into measures to support sustainable transport choices thus further contributing towards the Council's objectives.

Repeated tax/ already pay VED

96 comments

A number of respondents stated that the proposals were unfair because they already paid car tax so this was an additional and repeated form of tax. Some also objected to the Council taking the proposed action to influence vehicle choice and felt it should be left to the Government.

Council response:

The VED scheme (or car tax) levied by the Government is a national scheme so does not take account of local circumstances in relation to congestion and air quality. The current rate of change is too slow to address Merton's high levels of congestion and air pollution with the urgency required, so it is considered appropriate that the Council apply a supplementary local charge via parking prices with the aim of increasing the speed of modal shift in our area.

Provide financial information on spending

5 comments

Some respondents wanted to know what the additional revenue raised would be spent on.

Council response:

Too soon after increase in Jan 2020

82 comments

A number of respondents felt that these proposed increases were too soon after the last set of increases in January 2020 due to the financial impact. In addition, it was felt that there had not been enough time to assess if the January 2020 increases were sufficient and assess their impact on permits allocation.

Council response:

It is considered necessary and justified that charges are set at a level that influences choices about whether to own a vehicle and the type of vehicle to own. Parking charge increases were implemented recently in January 2020 but are still relatively low at a maximum of only

<p>£150 per year. This increase was an important step, particularly following a long period of parking prices being frozen since 2010. However, despite this recent increase it is not considered that the maximum amount is high enough to adequately influence travel choices. The current charges are lower than public transport costs and are also considerably lower than the maximum charges for residential permits in some other London boroughs.</p>	
<p>Impact of Covid-19 on proposal and timing</p> <p>A large number of respondents commented upon the impact of Covid-19 on this proposal and felt that it was an inappropriate time to introduce these changes. They felt that the Covid situation may add to the financial impact of the proposals because of the likelihood of increased unemployment, redundancy and reduced earnings. Due to financial pressures, residents facing an uncertain future may be unwilling or unable to take out loans or increase their debts to purchase a new vehicle. Some residents may also be directly affected by illness and mental health problems. feeling isolated and</p> <p>In addition, respondents particularly felt that the Covid situation creates a greater requirement for personal vehicles in order to avoid public transport in response to government advice.</p> <p>Council response:</p> <p>The Covid-19 crisis developed just after Cabinet approval of the consultation on emissions based parking charges in March 2020. It is recognised that the Covid-19 pandemic has since had a significant impact on work and travel patterns and that people have, for periods, been advised to avoid public transport.</p> <p>Covid 19 has presented an opportunity embed some significant changes to travel behaviour such as increased home working and has demonstrated that when car journeys are reduced the improvements achieved can be significant. However, the crisis also presents a threat to our transport objectives with the potential for an increase in car journeys as people reduce their use of public transport. This has reinforced the need to act robustly and quickly to ensure that any changes to transport behaviour as a result of Covid-19 do not further contribute to the transport challenges we face.</p> <p>However, it is not proposed to implement the proposal until after April 2021, by which time it is hoped that the situation will be improved and restrictions on public transport will be lifted. The situation will continue to be monitored and it is proposed that the Director of Environment and Regeneration in consultation with the Cabinet Member be given discretion over the timing of the implementation, so this can be extended if necessary in light of the situation, particularly any restrictions on public transport use.</p>	<p>221 comments</p>
<p>Makes me consider moving out of Merton</p> <p>Some respondents stated that if the proposal was introduced they would move out of Merton including because it would be unaffordable.</p> <p>Council response:</p> <p>There are many factors to consider when deciding where to live including transport options and costs. Merton benefits from a good access to public transport and surveys have identified this as one of the factors the residents most value about living in the borough. However, urban environments can become congested and local authorities may take measures such as parking charges to address this for the benefit of all residents.</p>	<p>27 comments</p>
<p>RingGo system poor/ difficult</p>	<p>11 comments</p>

Some highlighted that greater dependence on the RingGo system would be difficult as it had a number of problems and was not user friendly.

Council response:

The new permit system was successfully introduced in January 2020 and council staff have now processed in addition of 20,000 Permits and thousands of other self-service activity has taken place. Initial teething issues have been worked through and we will continue to work with RingGo to further improve the software further. Specifically in respect of Emission Based Charging our supplier has already successfully delivered a variety of emissions based parking schemes for a number of London boroughs including: Westminster City Council , City of London, LB Islington, LB Camden, LB Tower Hamlets.

Proposed Charges

Too High

240 comments

A large number of respondents felt that the charges were too high.

Council response:

Charges have been considered and set at levels which will disincentivise car ownership and use and encourage consideration of alternative transport options. According to data from the RAC foundation the costs of motoring over the last decade has reduced in relation to both the cost of living and average wages which is likely to have incentivised car use.

It should be noted that under the proposals, permit costs for just over a quarter of existing vehicles which have low emissions will actually reduce (11%) or stay the same (16.5%). A further 40% of permits will be subject to a modest increase of only £20- £60 per annum. The remaining third of permits will be subject to a significant increase of between £150 and £390 per year. It is considered that these higher charges for the higher polluting vehicles in particular will further strengthen the approach of using pricing to disincentivise car ownership, and may particularly have an influence on the ownership of older second vehicles.

Cannot afford

356 comments

A large number of respondents raised concerns that the charges were unaffordable and would have a detrimental financial impact on lower income groups.

Council response:

The council is mindful of economic challenges facing many residents and visitors to the borough, but this needs to be balanced with obligations to due poor levels of air quality and improve public health. Poor air quality and public health is known to particularly affect vulnerable groups including those on lower incomes. Lower income groups in outer London are also less likely to own a vehicle (TfL Travel in London report 12). Therefore, lower income groups are much less likely to be affected by the proposals but are more likely to suffer the negative impacts of car use.

It is recognised that in some areas with little transport alternative to owning a car the upfront and annual costs of car ownership can result in people being pushed into transport poverty. This does not tend to apply to London including significant parts of Merton where sustainable alternatives tend to be good There are some lower income areas in the Borough affected by poorer transport accessibility that have higher levels of car ownership (e.g. Pollards Hill Ward), but these do not tend to have CPZs so not be affected by these proposals. However,

<p>across most the 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.</p> <p>There are also supporting transport measures in place for low income groups that will help to mitigate the impact of these proposals. TfL offer a scrappage grant of £2k to London residents who are on certain benefits and have a car that does not comply with ULEZ standards. TfL also offer discounts of 50% on some public transport services for London residents on certain benefits, which makes sustainable transport options more affordable.</p>	
<p>Too Low</p>	<p>7 comments</p>
<p>There were a few comments received from respondents recording their views that they felt the cost of resident permits were too low. These respondents felt that the resident permits despite the increases, were still too low in order to achieve the objectives in the proposed policy.</p> <p>Council response:</p> <p>The council notes the support for the principle of increasing charges to discourage car use. The Council considers that a reasonable balance has been struck in setting the charges that are significantly higher for the most polluting vehicles. Once the charges are implemented, the council will monitor their effectiveness.</p>	
<p>Cap permits/ Higher 2nd/3rd Charge</p>	
<p>26 comments</p>	
<p>A small number of respondents stated the issue of resident permits should be limited. The respondents felt that multiple vehicle ownership creates a higher demand on the supply of available parking bays within a given address/CPZ often causing difficulties in finding a parking bay near to where the vehicle owner resides.</p> <p>Council response:</p> <p>Multiple vehicle ownership creates a higher demand on the supply of available parking bays and adds to the problems associated with parking dominance in residential streets.</p> <p>The council introduced supplementary charges for additional permits per household in January 2020. Under the current proposals these supplementary changes will remain and the permit holder will also have to pay the full charge for each vehicle based on emissions.</p> <p>In addition, the Council will further investigate introducing a permit cap for new applications for permits over one per household.</p>	
<p>Expensive for and discourages traders and visitors</p>	
<p>127 comments</p>	
<p>A significant number of comments raised concerns about the proposed increase to the annual visitor permit and to pay per visit parking, particularly the scratch cards. It was felt that the cost of visitor permits will discourage visitors which some vulnerable residents are dependent on for their physical and mental wellbeing.</p> <p>Concern was also expressed the extra expense that the proposals will incur for residents having traders visit.</p> <p>Council response:</p> <p>The proposed annual visitor permit and scratch cards offer flexibility by not being vehicle specific, but this means that vehicle emissions cannot be established. The higher charges</p>	

are therefore based on an assumption that the vehicles are of the highest category of emissions which is necessary or these types of permits could be used by higher emitting vehicles to avoid the charges.

As an alternative to purchasing scratch cards, a visitor with a lower emitting vehicle can reduce the cost by purchase an e-permit using the RingGo app. It is acknowledged that some vulnerable residents, including the elderly, may be used to purchasing scratch cards for guest and may be less likely, to have access to a smart device. However, unlike scratch cards their visitors will be able to access the RingGo app directly themselves? And the same applies for traders.

The uptake of the annual visitor permit has declined since the price increases in January 2020. 40% of visitor permits are now purchased through RingGo since its introduction in January 2020 and that is projected to rise further. The uptake of annual visitor permits and scratch cards will continue to be monitored.

Charges too complex

A number of respondents stated that the proposal was over complicated and they struggled to fully understand it.

Council response:

The proposed charging scheme does incorporate a range of elements that attempt to reflect some of the complexities in transport choices. This includes an element related to public transport accessibility variations that reflects the sustainable transport options available to residents in that areas. The new proposals incorporate a further element to target the most polluting vehicles and this was raised by many residents in a previous consultation that felt a polluter pays principle would be fairer. The less complex alternative would be to have one set rate for all vehicles, but this would not incorporate an element to incentivise vehicles with lower emissions.

Need for a car

Disabled / carers / elderly plus social isolation 169 comments

A large number of respondents raised concerns about the impact of the proposals on the disabled, carers and the elderly particularly those that may be affected by social isolation.

Council response:

Merton is committed to supporting its residents that have mobility issues and is a member of the national Blue Badge scheme which provides a range of parking and other motoring concessions for people who are registered blind or have severe mobility problems. In 2019? The Blue Badge eligibility scheme was further extended to those with a wide range of mental health issues that affect their mobility. Blue Badge holders are unaffected by these proposals and can continue to park free of charge in any Merton disabled parking bay, pay & display and shared use bay or permit holder bay.

A Blue Badge holder in Merton is also entitled to apply for a free carer permit under certain conditions to further support those residents with mobility issues and in need of regular support and care. Carers permits are also unaffected by these proposals and will not be subject to emissions based charges.

To further support accessibility for older and disabled residents it should be noted that they are also eligible for the freedom pass that enables them to travel free on all public transport services in London during off-peak hours.

<p>Family</p> <p>Many respondents felt that they needed a car for family reasons, including parents that face practical difficulties associated with transporting dependent children, particularly for the school drop off and pick up.</p> <p>Council response:</p> <p>The Council does appreciate the logistical difficulties raised by parents, but this issue highlights the difficult balance that the Council needs to strike to reduce the impacts of air pollution and road safety, which particularly affect children. 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.</p> <p>It is recognised that some parents may want or need to drive their children to school/ nursery. But this creates a catch 22 situation that makes the street environment more intimidating and polluted for other children cycling or walking to school. For this reason, Merton aims to encourage active travel to school and has been working with schools on implementing school travel plans including measures such as cycle training. Recently the Council has gone further and taken the bold step of implementing school street schemes that prevent parental parking during pick up and drop off times at 27 Schools across the Borough.</p>	<p>137 comments</p>
<p>Work purposes</p> <p>Many respondents felt that they required a vehicle to access work due to location, shift work or the need to carry equipment.</p> <p>Council response:</p> <p>It is recognised that some residents will continue to need a car for essential work purposes. The main objective of this scheme is to discourage unnecessary car use with the aim of reducing parking pressure and congestion, which will be of benefit to people who do still need to drive for essential purposes.</p>	<p>100 comments</p>
<p>Occasional use</p> <p>A number of respondents felt that the proposal was unfair it penalised people that required a car for essential weekend/ shopping/ recycling trips but only used their car occasionally so did not make a significant contribution to pollution.</p> <p>Council response:</p> <p>Once residents have invested in the upfront cost of owning a car they will be much more likely to use it, even for short trips. Data from TfL (Travel Demand Report 12) demonstrates that those with a car drive a lot more than those with no car and households with 2 cars drive even more. This supports the Council's objective to encourage residents to reduce their vehicle ownership.</p> <p>The increasing availability of online shopping and deliveries provides an alternative to transporting bulky items by car. Car clubs also give residents the option of using a car occasionally on a pay as you go basis, without the hassle of owning a car. Merton has a network of up to 60 car club vehicles mainly located within the CPZ areas in the borough.</p>	<p>142 comments</p>
<p style="text-align: center;">Sustainable Transport</p>	
<p>Electric Vehicles too expensive</p> <p>A large number of concerns were raised regarding the cost of electric cars.</p>	<p>196 comments</p>

Council response:	
<p>ULEVs and in particular electric vehicles have a significantly higher initial purchase cost at the current time. The EV market is evolving rapidly and there are likely to be further technology advances over the coming years, particularly in relation to batteries that will lower cost. EVs are projected to achieve cost parity by 2024 (citation). In the meantime, when other savings in fuel costs, taxes and other charges are taken into account, then EVs become more financially competitive.</p> <p>These proposals retain the price of permit for an EV at only £20 which provides a significant annual saving for EVs on parking costs. It should also be noted that 9 out of 10 newly purchased vehicles are purchased through pay monthly finance schemes, which makes the upfront vehicle cost less of a barrier and associated costs such as tax and parking more relevant to monthly cost calculations.</p>	
More EV charging	102 comments
<p>Respondents were concerned about limited electric charging facilities, particularly in CPZ areas where residents don't have access to their own driveways.</p> <p>Council response:</p> <p>To encourage the uptake of electric vehicles, Merton Council is working with Source London, London Councils and Transport for London to put in place a mix of electric vehicle charging solutions.</p> <p>The Council is introducing a scheme to install 80 EV charge points in lamp columns in CPZs by April 2021. This will add to the 100 publicly accessible electric charge points operated by Source London (7kw) and 5 rapid charge stations (50kw) on the TfL road network.</p> <p>The EV charging technology and the accompanying market is evolving rapidly and there are likely to be further technology advances over the coming years. The Council will continue to assess developments in technology in relation to future proposals for charging facilities.</p>	
Negative environmental impact of EVs	52 comments
<p>Respondents felt that the negative issues of electric cars had not been adequately covered, particularly the manufacture of electric vehicles and the disposal of batteries. Some questioned whether Electric Vehicles (EVs) really produced less emissions when manufacturing and electricity production was taken into account.</p> <p>Council response:</p> <p>The Council is in agreement with the Government's current policy framework as set out in "The Road to Zero" which is supportive of increasing EVs and phasing out petrol and diesel. There is consensus that EVs certainly produce lower emissions direct from the tailpipe which will reduce the urban air pollution associated with health problems. There has however been a lot of debate about how the whole-life energy costs of building and running an EV compared to a standard vehicle, largely related to battery production and producing the electricity to recharge them.</p> <p>A study from Imperial College London has found that the increased use of renewable and low-carbon energy generation in the U K means that, on average, charging an EV produces just a quarter of the CO2 emitted by a petrol or diesel engine. Taking into account the production of an EV's battery as well the CO2 emissions associated with charging it over its lifetime, the study found an EV's CO2 contribution was around half that of an equivalent</p>	

internal combustion engine (ICE) vehicle. It found that after two to three years the lack of tailpipe emissions from the most efficient EV models would have balanced out the CO2 emitted in their battery production. It also suggested that the “decarbonising” of the UK’s electricity supply could reduce their environmental impact further.

More car sharing/ car clubs

14 comments

Respondents stated that they would be likely to use car clubs if there were more car club bays, pick up/drop off points and charges were less. A few respondents mentioned the emissions of car club vehicles themselves.

Council response:

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. There is a network of approximately 60 car club vehicles in Merton, mainly located in CPZ areas.

Although individual trips via a car club can seem expensive, users do not have to pay for all the upfront annual costs of car ownership such as insurance, tax and parking so it will often work out to be a cheaper option overall for infrequent drivers. The main car club operators offer different tariffs that can lower the costs depending on how often you need to use a vehicle and for what purpose. For example, for short trips one way trips it may be possible to hire a car on a pay per minute tariff. For longer hires, hourly and daily rates are available.

The main environmental benefit of car clubs is that users reduce their overall mileage and hence emissions. The main car club operator in Merton has committed to fully electrifying their fleet by 2025.

Public transport network needs improvement

67 comments

Many respondents raised general issues about access to public transport across the Borough and highlighted the lack of public transport in specific areas of the borough. In the survey 84% of residents thought that the better public transport was very important. Some residents raised specific issues that affect accessibility such as the lack of step free access at Raynes Park station.

Council response:

The comments about the accessibility of public transport services are acknowledged. Merton is not directly responsible for public transport services but in accordance with its Transport Strategy will continue to lobby for improvements to services within the borough.

Merton is considered to have good access to the public transport network, although it is acknowledged that this varies. Merton is officially classified as an outer London borough, but it sits between inner and outer London and its public transport accessibility levels vary in accordance with this. The areas of good public transport accessibility generally align with CPZ areas which are affected by these proposals.

Transport for London continues to explore options for increasing public transport capacity across the capital, including potential extension to the tram network in Merton (Sutton Link) and other capacity enhancements to the underground network, all of which are supported by the council.

The council works closely with TfL and Network Rail in ensuring that the highway infrastructure accommodates the efficiency of the public transport services including bus stops.

Improving connectivity in areas with a low Public Transport Accessibility Level (PTAL) score, especially by bus or other demand lead services offers an effective approach to support growth, access to employment and services as well as reducing reliance on private cars. The Council will continue to lobby TfL to improve bus services in areas currently poorly served by public transport to provide a reliable alternative to car ownership and increase access to employment and services.

The council has recently supported South Western Railways in its "Access for All bid" to the Department of Transport for step free access at Rayne's Park and Motspur Park Stations.

Public transport costs

24 comments

A number of respondents raised the cost and affordability of public transport services as a barrier to use.

Council response:

The comments about the cost of public transport services are acknowledged and it is recognised that the cost of some public transport services have risen in recent years. This is particularly the case for mainline rail services which will affect residents in some parts of the borough that are primarily served by mainline rail. However, the cost of bus travel in London has been frozen by TfL and 'Hopper' tickets are available that allow passengers to use more than one bus to complete their journey.

Merton is not directly responsible for the costs of public transport services but in accordance with its Transport Strategy will continue to lobby to keep the costs of services affordable. This will include issues such the introduction of flexible season tickets that reflect the reduced need to travel as a result of Covid-19 and increased remote working. The Council will also lobby to retain free and discounted travel schemes including the freedom pass and free travel for children.

Public transport emissions

28 comments

Comments were received about the need to tackle emissions from public transport, particularly buses.

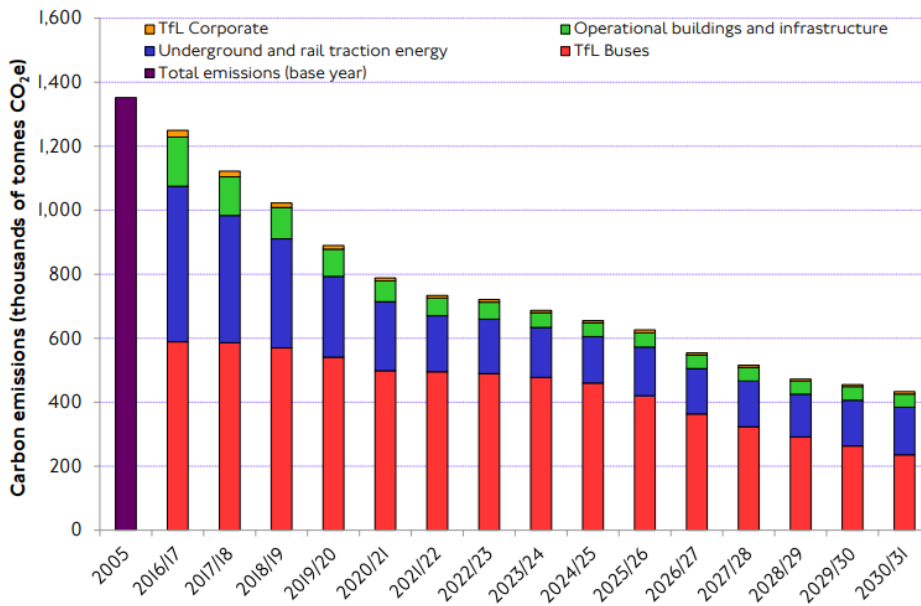
Council response:

It is recognised that buses, particularly older diesel models can produce a significant amount of emissions. However, because public transport carries many more people the emissions per person are less than those produced by most private vehicles.

TfL are responsible for emissions from their public transport services that operate in the borough including buses.

The Mayor's Transport Strategy sets out a comprehensive set of policies and targets for reducing emissions from public transport sources and sets the following trajectory as shown below. The Council will continue to lobby TfL to significantly accelerate the roll out of electric and hydrogen buses in outer London.

Figure I0.7 Trajectory for reductions in attributable CO₂ emissions for transport in London.



Source: Strategic Analysis, TFL City Planning.

Better cycle lanes/ network

65

A number of comments suggested that more segregated cycle lanes were needed to support active travel and 60% of survey responses also replied that cycle lanes were important.

Council response:

Merton Council’s transport strategy (LIP3) aims to increase levels of cycling in the borough to tackle traffic congestion, improve air quality, promote active travel and improve accessibility. This is in line with regional policies set out in the Mayor’s Transport Strategy and the recent government guidance document “gear change”.

To facilitate an increase in cycling, Merton is committed to improving the cycle network as set out in detail in the LIP. Merton has already invested a significant amount into improving the cycle network and has delivered approximately 6 km of cycle routes over the last 6 years. Additional schemes including segregated routes have been implemented in the current financial year, particularly in response to Covid-19 and more are planned by April 21.

However, it is recognised that it will be necessary for the Council to make further improvements to the cycle network. The Council is committed to producing an updated cycling strategy by 2022 as set out in the Climate Change Strategy and Action Plan.

Cycle lanes causing congestion

27 comments

Some respondents felt that cycle infrastructure had taken highway space, particularly in response to Covid-19, which had caused congestion which would add to pollution.

Council response:

Merton Council’s transport strategy (LIP3) aims to increase levels of cycling in the borough to tackle traffic congestion, improve air quality, promote active travel and improve accessibility. This is in line with regional policies set out in the Mayor’s Transport Strategy and the recent government guidance document “gear change”.

To facilitate an increase in cycling, Merton is committed to improving the cycle network as set out in detail in the LIP. 60% of respondents to the survey thought this was important and a number of comments stated that they wanted more cycle lanes and that they felt cycling on the existing road network was dangerous.

To overcome these barriers to cycling the Council in conjunction with TfL must act to provide better cycle networks, including segregated lanes to encourage people to consider cycling. Bicycles take up significantly less road space than cars so are a more efficient use of road space so can contribute towards reducing congestion in the long term as more people take up cycling. However, it may take some time for the mode shift to cycling to occur.

It should be noted that within Merton no traffic lanes have been fully removed to accommodate cycle lanes in response to Covid-19. Some works have been carried out to improve cycling facilities and some disruption may be caused during the works and for some time afterwards as people get used to the new traffic arrangements. The increased amount of cars on the road since the lockdown was eased are a major cause of any recent congestion observed in the borough. This emphasises the need for modal shift away from car use as there is no realistic way that the existing urban road system in Merton can be engineered to accommodate demand for motor vehicles.

Better cycle parking/ no storage for a bike

31 comments

Over 60% of survey respondents thought that better cycle parking facilities were important and 31 comments were received that mentioned lack of secure cycle parking, particularly at home. It should also be noted that the Council has received over 90 requests for secure residential cycle parking during 2020.

Council response:

The provision of adequate and convenient cycle parking is vital in encouraging cycling as a viable travel option. A lack of suitable cycle parking and an associated fear of cycle theft is one of the main barriers to cycling. When cycle theft occurs, 34 per cent of victims stop cycling temporarily or altogether as a result.

Merton has a significant amount of existing housing stock that has inadequate space to store a bicycle and this is often in areas with CPZs. Unfortunately, these locations often coincide with areas of the Borough where the population demographics and cycle route infrastructure otherwise offer the greatest potential for an increase in cycling rates.

To help overcome this barrier the Council will aim to install secure cycle storage units on-street in areas with high demand. The Council has funding to install 15 units by April 2021, which will accommodate a total of 90 bicycles. It is likely that further units will be installed in future years' subject to demand and funding availability.

It is proposed that surplus parking revenue generated by this scheme will be used to subsidise annual management and maintenance cost that residents have to pay per space in unit (£72). It is proposed to reduce the annual cost to residents to £20 which has been done in other boroughs including Waltham Forest. This would bring charge in line with our EV charge as it would be inconsistent for cyclists to pay more than this to park a bike.

The Council is also identifying locations which may require more on-street cycle parking, including high streets and stations and these will be installed as part of the Council's ongoing highway improvement programme.

Promote cycling

21 comments

<p>A number of respondents thought that the Council could do more to promote cycling to residents.</p> <p>Council response:</p> <p>Merton Council's implements a range of measures to promote and support cycling and will continue to do so. These include an extensive cycle training programme for all ages, regular events such as "Dr Bike" maintenance sessions and schemes such as "try before you bike". The Council also promotes cycling as part of regular communications to residents including articles in My Merton magazine.</p>	
<p>Cycle hire schemes</p> <p>Respondents stated that it would encourage them to cycle if they were able to hire bikes within Merton.</p> <p>Council response: The council is working with TfL and neighbouring boroughs to investigate the introduction of a dock-less cycle and electric scooter hire schemes in Merton. This will enable residents to collect a hire bike or scooter from a number of designated cycle collection/drop off points across the borough and cycle to their destination.</p>	<p>2 comments</p>
<p>Cycling dangerous</p> <p>A number of comments raised concerns over the safety of cycling.</p> <p>Council response:</p> <p>The council will continue to undertake reviews of cycle safety, closely monitor accident statistics and take steps to continually improve cycle safety. This includes cycle training and through investing in cycling infrastructure, particularly segregated lanes and off road tracks.</p>	<p>39 comments</p>
<p>Walking unpleasant/ dangerous</p> <p>Some respondents stated that walking in Merton, particularly in some areas was not pleasant. There were a variety of reasons such as volume of traffic, roadworks (limiting kerb space), poor signage, poor street lighting and rubbish in the roads.</p> <p>Council response:</p> <p>The most direct and convenient walking routes between town centres and key attractors are often along difficult to cross, busy, traffic dominated connector streets and junctions. The Council already has and will continue to invest in infrastructure to overcome these barrier including pedestrian crossings and junction treatments.</p> <p>This proposal is aimed at contributing towards a reduction in the traffic dominance and emissions that can make walking unpleasant.</p>	<p>21 comments</p>
<p>Walking/ cycling not an option for everyone</p> <p>A number of respondents stated that they supported sustainable travel options but that walking and cycling was not an option for everyone. For example, the elderly cannot all cycle and walking to shops can be difficult if you are limited how much you can carry.</p> <p>Council response:</p> <p>It is acknowledged that not all residents will be able to use active travel modes for a variety of reasons. However, one third of trips made by Londoners by car could be walked in 25 mins (TfL Walking Action Plan 2018). TfL has identified that only 5% or cyclable trips in Outer</p>	<p>95 comments</p>

<p>London are currently cycled. These proposals are aimed at encouraging as many people that can to choose active alternatives.</p> <p>Merton already has the blue badge scheme in place to assist people with mobility difficulties but it would be difficult for the Council to introduce a scheme that took account of other reasons for requiring a car.</p> <p>The outcomes of reduced congestion and parking demand and lower emissions, should also improve the transport experience and health outcomes for those residents that have no choice by to use a vehicle.</p>	
<p>Sustainable travel to schools</p> <p>A number of respondents raised a number of issues around travel to school.</p> <p>Council response:</p> <p>Too many parents still choose to take their children to school by car increasing congestion on the road network and in close proximity to the school. At school home time, parents frequently arrive early to obtain nearby parking spaces and then sit waiting in their cars with engines running (or idling), all of which contributes to poor air pollution in Merton and across London. Merton also has a number of schools that tend to have wider catchment areas across borough boundaries. This results in higher numbers of parents choosing to drive their children to school.</p> <p>The council in partnership with the Police, Transport for London and schools themselves, works to improve road safety and sustainable travel to school. The council has a rolling programme of works which includes engineering measures such as school “zig zag” markings and localised 20mph speed limits to make the area outside the school safer.</p> <p>Recently the Council has taken the bold step of implementing school street schemes, that prevent parental parking during pick up and drop off times, at 27 Schools across the Borough.</p> <p>The Council also supports schools with developing their travel plans through the TfL STARS programme. The council will facilitate a programme of behaviour, road safety and educational initiatives, such as Junior Travel Ambassadors, scooter/cycle training and kerb craft. The council has also supported schools in providing and expanding on-site cycle and scooter parking facilities for pupils and staff.</p>	<p>25 comments</p>
<p>General traffic issues</p>	
<p>Engines idling</p> <p>Respondents raised a number of concerns regarding vehicles leaving their engines idling, which creates unnecessary emissions.</p> <p>Council response:</p> <p>Merton has a clear commitment to tackle anti-idling and are part of a multi borough scheme funded by the Mayor of London. This project includes communications and Merton have installed 200 signs in the borough in key locations.</p> <p>There is also a funded project focusing on behavioural insights around the best messaging to prevent idling at schools.</p> <p>Enforcement officers have been trained on enforcement of anti-idling and when on the ground activities restart following Covid-19 they will be focussed around schools.</p>	<p>12 comments</p>
<p>Other polluting vehicles</p>	

<p>A number of respondents highlighted the pollution from other types of vehicles including HGVs and taxis.</p> <p>Council response:</p> <p>The Council accepts that HGV's contribute disproportionately to poor air quality but has limited powers to address this directly. The council will continue to lobby Government and work with TfL to reduce HGV emissions from freight. The Mayor's Transport Strategy sets out policies in relation to freight vehicles, which include the London wide Low Emission Zone.</p> <p>As of 2018, all new black taxis must be zero emission capable and these vehicles cannot be older than 8 years. The Mayor for London has put in place incentives to speed up this transition. We are also working with TfL and Source London to identify suitable sites for rapid charge stations for taxis and other high usage vehicles. The council will work with the London Taxi Office to try to reduce the amount of engine idling.</p>	
<p>Traffic management/Road humps</p> <p>Respondents raised a number of issues regarding general traffic management and highway design issues that they believed had an impact on air quality, including 20 mile per hour zones, traffic calming measures and low traffic neighbourhoods.</p> <p>Council response:</p> <p>Merton Council's traffic management policies are focused towards ensuring road safety and promoting sustainable travel choices as well as reducing congestion and emissions.</p> <p>A 2018 report by TfL found that 20mph zones have no net negative effect on emissions.</p>	
<p>Address rat runs</p> <p>Some respondents felt that the 'rat runs' within the borough that added to the congestion issues should be addressed.</p> <p>Council response: There are areas across the borough where motorists rat-run through local streets or cruise streets looking for parking spaces. The council will work with residents to investigate and implement measures to reduce through traffic on local roads, including measures, such as filtered permeability schemes where access is restricted to cyclists only as part of a wider healthy neighbourhood proposal. The Council has implemented several low traffic neighbourhoods this year in response to the Covid-19 crisis and will consider making these permanent.</p>	<p>10 comments</p>
<p>Environment</p>	
<p>Will encourage conversion of front gardens to driveways</p> <p>Respondents raised concerns that the proposal could encourage more conversion of front gardens to private drives to avoid the charges.</p> <p>Council response:</p> <p>The costs of installing a driveway and dropped kerb are substantial and many times higher than the cost of an annual permit, so it will not necessarily be financially beneficial to install a new driveway to avoid the proposed charges.</p> <p>Where applications for residential crossovers meet the required access and design criteria the council cannot unreasonably refuse requests. However, through the planning process</p>	<p>48 comments</p>

where applicable the Council will encourage the retention of planting and the use of permeable surface materials.	
More trees	17 comments
Some respondents suggested more trees to tackle emissions.	
Council response:	
At 28%, Merton has one of the highest proportions of tree cover of any London borough. Vegetation in Merton, particularly our ~220,000 trees, only captures a small fraction (0.1%) of Merton's emissions each year. However, trees can play an important role in increasing our resilience to the impacts of climate change (such as overheating and flooding), improving air quality, and providing wildlife habitats which help maintain and increase biodiversity.	
Merton will aim to increase tree cover by 10% by 2050, potentially equivalent to planting around 800 trees every year to 2050. The main opportunities to plant trees are likely to be on private land such as gardens, which hold around two thirds of the trees in Merton.	
Bonfires	3 comments
A small number of residents raised the contribution of bonfires to local air pollution and suggested these be tackled.	
Council response:	
Merton strongly encourages residents not to have bonfires because they contribute to poor air quality and can affect people with respiratory problems. Although there are no direct byelaws covering bonfires in the borough, if a bonfire is considered to be a nuisance the Council could take formal action. See Merton's website for further details.	
The Council are also lobbying Government for a new Clean Air Act that will provide better powers to local authorities to proactively tackle wood burners and bonfires.	
Heathrow expansion	
There were a few specific concerns regarding Merton's response to the possible expansion to Heathrow and the impact that this has on pollution.	
Council response:	
The Council actively engaged on consultations on the expansion of Heathrow and the full response to the consultation can be viewed here .	
Council Processes	
Process/ proposal discriminatory	69 comments
The respondents felt that the proposal was discriminatory as it only affects certain groups in Merton despite those not being the only groups contributing to air quality.	
Council response:	
It is recognised that the current proposals will not address all car owners in Merton equally, but the Council only has the powers to manage the parking spaces it controls.	
A full Equality Assessment has been published alongside this report that assesses the impacts of the proposal on protected characteristics.	
Council vehicles/ staff travel behaviour	22 comments

A number of responses mentioned the emissions from the Council's own fleet of vehicles and asked what action was being taken to address Council staff travelling to work by car.

Council response:

In June 2019 the Council made a Climate Emergency Declaration which set a challenging target to decarbonise the Council's buildings and services by 2030. A Climate Change Strategy and Action Plan has been developed in response to this and was approved in November. This has an action to develop a staff travel plan consistent with the 2030 decarbonisation target, which will effectively mean that the Council is not able to use petrol or diesel vehicles on Council business by 2030. The Council is in the process of developing a set of staff travel policies that will achieve this objective and encourage staff to reduce car journeys and use sustainable travel alternatives. The Council is also developing strategies for replacing its fleet vehicle with electric models and will do that as soon as practicable before 2030.

Planning applications/ new development

10 comments

Some respondents raised the issue of new development increasing pressure on parking and the transport network and questioned why the Council was approving applications.

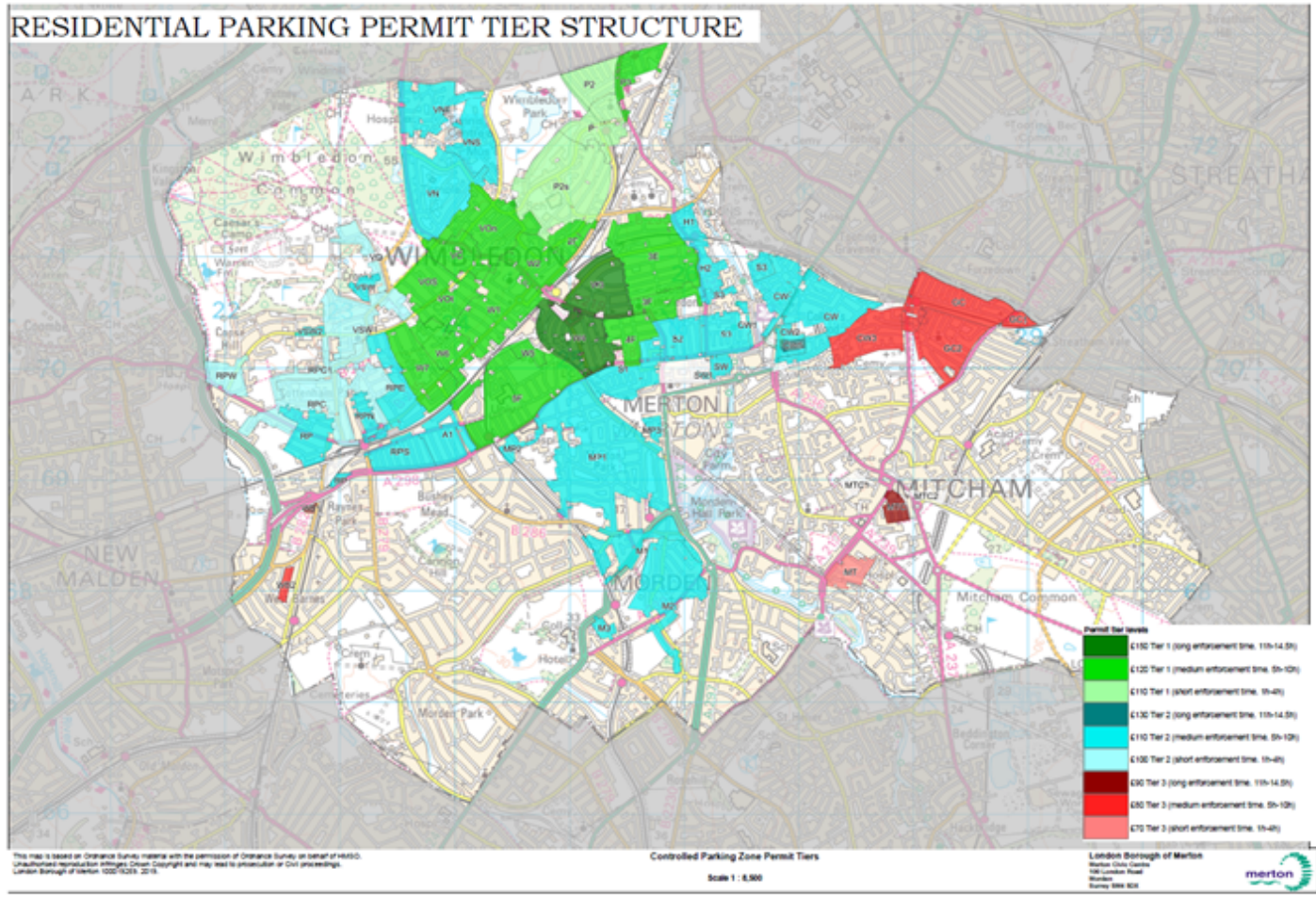
Council response:

New development can allow us to establish sustainable travel patterns at the outset by helping to deliver better supporting infrastructure through financial or in-kind contributions, such as wider footways and land dedication to provide new facilities or linkages. The council will encourage developers to look beyond their site boundaries when seeking to mitigate the impacts of their proposals.

Through its spatial policies contained in the London Plan and the Council's own emerging Local Plan the council proactively encourages permit free development, especially around town centre locations and where access to public transport is good or could be improved through funded investment.

All applications for new development will be assessed in relation to their transport impact and are required to put in place mitigating measures to support sustainable transport, such as cycle parking and car club membership.

It should be noted many existing and new developments, particularly in areas with good public transport accessibility levels (PTAL) are car free and residents are prohibited from purchasing parking permits.



Schedule of Proposed Parking Charges

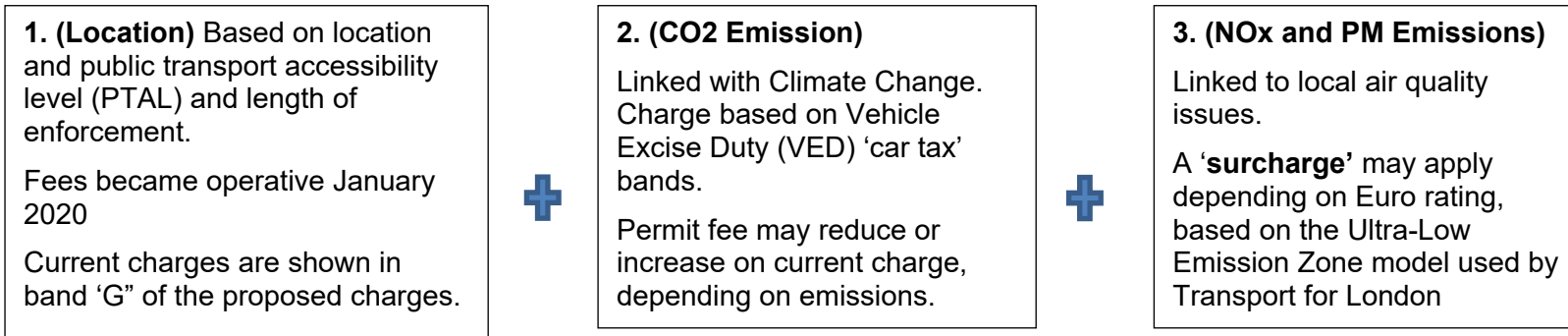
Appendix 5

The proposal retains key elements of the existing parking charge model introduced in January 2020, which is based on accessibility to public transport and length of time a controlled parking zone is enforced.

The current Permit charge for each permit type are shown in Band 'G' in each table.

The diagram below shows the principles applied for new Permit charges

Page 90



To find out what the charge for a particular vehicle:

1. In table 1, **Controlled Parking Zone and Tier identifier** please identify the Tier and Length of the period of enforcement in your Controlled Parking Zone.
2. Within the table of charges below, (tables 3 to 9) identify the Band your vehicle is in, based on Co2 emissions. This will show you your basic permit charge.
3. Check to see if your vehicle is subject to the ULEZ based charge shown in table 2.

Index of tables

Table 1 – Controlled Parking Zone and Tier identifier.

Table 2. ULEZ based surcharge

Table 3. Proposed resident permit charges

Table 4. Visitor permits

Table 5. Annual visitor permits

Table 6. Business Permits

Table 7. Trader permits

Table 8. Teacher permits

Table 9. On- and off-street parking –

Table 9a. ULEZ surcharge for on and off street individual parking sessions

Table 10. Season Tickets in Car Parks

Table 10a. ULEZ surcharge for season tickets

Table 1 – Controlled Parking Zone and Tier identifier

Tier	Length of enforcement	Controlled parking zone
Tier 1	Long	W3,W4
Tier 1	Medium	2F, 3E, 3F, 4F, 5F, VC, VOn, VOs, VOt, W2, W5, W6, W7, P3
Tier 1	Short	P1, P2 ,P2s
Tier 2	Long	CW5, MP4
Tier 2	Medium	CW, CW1, CW2, CW4, M1, M2, M3, MP1, MP2, MP3, S1, S2, S3, SW, SW1, A1, RP, RPE, RPN, RPS, H1, H2, VN, VSW, VSW2, W1, VNe, VNs
Tier 2	Short	RPW, RPC, RPC1, VSW1, VQ, CH.
Tier 3	Long	MTC, WB1
Tier 3	Medium	CW3, GC, GC1, GC2, GC3, WB2, MTC1, MTC2
Tier 3	Short	MT

Page 92

Table 1

Table 2. ULEZ based surcharge

-Type of vehicle	Surcharge per Permit
Petrol or diesel - Pre 2006 (EURO 1/2/3 and not applicable vehicles)	£150
Diesel - Between 2006 - August 2015 (Euro 4/5)	£150
Petrol - Between 2006 - August 2015 (Euro 4/5)	No charge
Petrol or diesel - Post September 2015 (Euro 6)	No charge

Table 2

Table 3. Proposed resident permit charges

The charges below are for the first resident permit at an address

Parking zone and enforcement length	Fully electric (A)	1-50 (B)	51-75 (C)	76-90 (D)	91-100 (E)	101-110 (F)	111-130 (G)* Current charge	131-150 (H)	151-170 (I)	171-190 (J)	191-225 (K)	226-255 (L)	Over 255 (M)
Tier 1 Long	£20	£100	£110	£120	£130	£140	£150	£170	£210	£300	£370	£450	£540
Tier 1 Medium	£20	£70	£80	£90	£100	£110	£120	£140	£180	£270	£340	£420	£510
Tier 1 Short	£20	£60	£70	£80	£90	£100	£110	£130	£170	£260	£330	£410	£500
Tier 2 Long	£20	£80	£90	£100	£110	£120	£130	£150	£190	£280	£350	£430	£520
Tier 2 Medium	£20	£60	£70	£80	£90	£100	£110	£130	£170	£260	£330	£410	£500
Tier 2 Short	£20	£50	£60	£70	£80	£90	£100	£120	£160	£250	£320	£400	£490
Tier 3 Long	£20	£40	£50	£60	£70	£80	£90	£110	£150	£240	£310	£390	£480
Tier 3 Medium	£20	£30	£40	£50	£60	£70	£80	£100	£140	£230	£300	£380	£470
Tier 3 Short	£20	£25	£30	£40	£50	£60	£70	£90	£130	£220	£290	£370	£460

Table 3

- The current Permit charge for each Tier is shown in band G and in bold
- Note: ULEZ based surcharge of £150 may also apply as set out in table 2

Table 4. Visitor permits

Zone and type of permit	0 g/km (A)	1-50	51-75 (C)	76-90 (D)	91-100 (E)	101-110 (F)	111-130 (G) Current Charge	131-150 (H)	151-170 (I)	171-190 (J)	191-225 (K)	226-255 (L)	Over 255 (M)	Scratch cards
Tier 1 Full day	£0	£4.25	£4.50	£4.75	£5.00	£5.25	£5.50	£5.75	£6.00	£6.25	£6.50	£6.75	£7.00	£8.50
Tier 1 Half day	£0	£2.75	£3.00	£3.25	£3.50	£3.75	£4.00	£4.25	£4.50	£4.75	£5.00	£5.25	£5.50	£7.00
Tier 2 Full day	£0	£3.25	£3.50	£3.75	£4.00	£4.25	£4.50	£4.75	£5.00	£5.25	£5.50	£5.75	£6.00	£7.50
Tier 2 Half day	£0	£2.25	£2.50	£2.75	£3.00	£3.25	£3.50	£3.75	£4.00	£4.25	£4.50	£4.75	£5.00	£6.50
Tier 3 Full day	£0	£2.25	£2.50	£2.75	£3.00	£3.25	£3.50	£3.75	£4.00	£4.25	£4.50	£4.75	£5.00	£6.50
Tier 3 Half day	£0	£1.25	£1.50	£1.75	£2.00	£2.25	£2.50	£2.75	£3.00	£3.25	£3.50	£3.75	£4.00	£5.50

Table 4

- The current Permit charge for each Tier is shown in band G and in bold
- Note: ULEZ based surcharge of £150 may also apply as set out in table 2

Table 5. Annual Visitor Permits

As the Annual Visitor permits are not vehicle specific it is not possible to vary the charge based on vehicle emissions. It is recommended that Annual Visitor Permits should reflect the highest charge plus the ULEZ surcharge, because they are not vehicle specific.

Page 95

Zone	Current charge 2020	Proposed Highest Tier Charge VED	Total Proposed Charge with £150 ULEZ based surcharge
Tier 1 Long	£400	£540	£690
Tier 1 Medium	£370	£510	£660
Tier 1 Short	£360	£500	£650
Tier 2 Long	£380	£520	£670
Tier 2 Medium	£360	£500	£650
Tier 2 Short	£320	£490	£640
Tier 3 Long	£340	£480	£630
Tier 3 Medium	£330	£470	£620
Tier 3 Short	£320	£460	£610

Table 5

Table 6. Business Permits

Charge for 6-month period.

CO2 Emission (g/km)	Emission Band	Current charge Zones W1-W5	Zones W1-W5	Current charge - Other Zones	Other Zones
0	A	376	£20	£331	£20
1 to 50	B	376	£176	£331	£131
51-75	C	376	£236	£331	£191
76-90	D	376	£286	£331	£241
91-100	E	376	£326	£331	£281
101-110	F	376	£356	£331	£311
111-130 Current charge	G	376	£376	£331	£331
131-150	H	376	£416	£331	£371
151-170	I	376	£466	£331	£421
171-190	J	376	£526	£331	£481
191-225	K	376	£596	£331	£551
226-255	L	376	£676	£331	£631
Over 255	M	376	£766	£331	£721

Table 6.

- The current Permit charge for each Tier is shown in band G and in bold.
- Note: ULEZ based surcharge of £150 may also apply as set out in table 2

Table 7. Trader permits

Based on 12 months

CO2 Emission (g/km)	Emission Band	All Zones
0	A	£20
1 to 50	B	£600
51-75	C	£680
76-90	D	£750
91-100	E	£810
101-110	F	£860
111-130 Current charge	G	£900
131-150	H	£940
151-170	I	£990
171-190	J	£1,050
191-225	K	£1,120
226-255	L	£1,200
Over 255	M	£1,290

Table 7

- The current Permit charge for each Tier is shown in band G and in bold.
- Note: ULEZ based surcharge of £150 may also apply as set out in table 2

Table 8. Teacher permits

Based on 12 months.

CO2 Emission (g/km)	Emission Band	All Zones
0	A	£20
1 to 50	B	£138
51-75	C	£148
76-90	D	£158
91-100	E	£168
101-110	F	£178
111-130 Current charge	G	£188
131-150	H	£198
151-170	I	£208
171-190	J	£218
191-225	K	£228
226-255	L	£238
Over 255	M	£248

Table 8.

- The current Permit charge for each Tier is shown in band G and in bold.
- Note: ULEZ based surcharge of £150 may also apply as set out in table 2

Table 9. On- and off-street parking - ULEZ based charging tiers

A one-off surcharge of £1.50 is proposed to 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.

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

Table 9

ULEZ based surcharge -Type of vehicle	Surcharge per Permit
Petrol or diesel - Pre 2006 (EURO 1/2/3 and not applicable vehicles)	£1.50
Diesel - Between 2006 - August 2015 (Euro 4/5)	£1.50
Petrol - Between 2006 - August 2015 (Euro 4/5)	No charge
Petrol or diesel - Post September 2015 (Euro 6)	No charge

Table 9a

Table 10. Season Tickets in Car Parks.

A one-off surcharge of £150 (based on 12 months) to be applied on top of the cost of a season ticket, based on the ULEZ model.

Area - for residents and local workers	Current price	Local price Residents/local workers
Mitcham		
12 months with 60% discount	£300	£300
6 months with 40% discount	£150	£225
1 month with 20% discount	£25	£62.50
Morden		
12 months with c. 60% discount	£445	£700
6 months with c. 40% discount	£222.50	£500
3 months with 20% discount	£111.25	£375
Queens Road (Wimbledon)*		
6 months (based on local competition)	£480	£500
3 months (based on local competition)	£240	£250

Table 10

ULEZ based surcharge -Type of vehicle	Surcharge per Permit
Petrol or diesel - Pre 2006 (EURO 1/2/3 and not applicable vehicles)	£150
Diesel - Between 2006 - August 2015 (Euro 4/5)	£150
Petrol - Between 2006 - August 2015 (Euro 4/5)	No charge
Petrol or diesel - Post September 2015 (Euro 6)	No charge

NUMBER OF RESIDENTIAL PERMITS SOLD IN 2018/19 PER VED CATOGORY FOR EACH CONTROLLED PARKING ZONE.

Appendix 6

CO2 Emission (g/km)	0	1-50	51-75	76-90	91-100	101-110	111-130	131-150	151-170	171-190	191-225	226-255	over 255 and N/A
VED Band	A	B	C	D	E	F	G	H	I	J	K	L	M
ZONE 1													
SHORT													
P1	1	1	2	3	10	24	75	96	79	47	48	14	55
P2	1	2	0	3	11	37	129	156	117	77	45	23	95
P2S	1	0	0	3	16	36	104	112	89	63	65	32	62
T1 short	3	3	2	9	37	97	308	364	285	187	158	69	212
MEDIUM													
2F	1	2	0	1	12	17	39	61	63	38	26	11	49
3E	1	8	3	8	29	91	204	298	245	147	140	41	119
3F	1	0	1	0	9	25	71	70	85	44	33	14	32
4F	1	2	0	2	10	16	48	45	50	27	17	3	23
5F	1	4	4	4	42	74	173	227	182	147	98	23	107
P3	1	0	0	3	10	14	64	68	64	50	35	10	36
VC	0	2	0	1	11	21	45	52	33	22	18	16	33
VOn	3	5	1	1	7	14	37	49	40	34	26	10	41
VOs	5	3	1	1	4	7	11	25	28	12	31	7	18
VOT	5	0	0	1	9	13	36	54	42	25	25	14	47
W1	1	9	0	1	9	25	57	47	41	28	18	16	41
W2	1	1	0	2	10	4	35	44	34	19	15	13	17
W5	0	3	0	2	3	9	35	42	24	15	12	5	15
W6	0	1	0	0	4	14	26	25	29	17	12	5	22
W7	0	7	1	4	19	22	58	75	58	44	47	17	48
T1med	21	47	11	31	188	366	939	1182	1018	669	553	205	648
LONG													
W3	4	3	0	2	17	14	41	58	43	30	26	13	36
W4	1	8	0	4	26	33	129	155	128	89	59	24	69
Tier 1 Long	5	11	0	6	43	47	170	213	171	119	85	37	105
ZONE 2													
SHORT													
RPC	1	2	0	3	14	27	65	83	85	43	32	9	45
RPC1	0	1	0	0	1	3	8	16	9	10	14	2	9
RPW	1	1	1	1	4	15	17	15	18	10	6	6	9
VQ	0	0	0	0	3	2	21	21	21	19	12	3	12
VSW1	1	3	1	1	3	14	32	53	40	28	14	5	36
T 2 Short	3	7	2	5	25	61	143	188	173	110	78	25	111
MEDIUM													
A1	0	4	0	14	14	42	123	141	112	51	51	16	54
CW	0	9	1	11	54	136	263	373	298	154	121	37	165
CW1	0	0	0	0	0	1	7	7	6	2	2	1	2
CW2	0	0	0	0	1	1	6	8	4	4	1	1	5
CW4	0	0	0	1	0	6	1	8	5	1	5	0	4
H1	0	1	0	2	9	15	43	42	46	29	26	4	23
H2	1	1	1	1	10	23	52	52	52	30	24	7	31
M1	1	0	0	7	2	13	23	24	27	17	12	3	19
M2	0	0	1	3	21	24	66	93	86	53	31	13	56
M3	0	0	0	0	0	0	2	3	4	1	3	0	1
MP1	0	6	0	3	14	30	93	117	95	64	39	17	60
MP2	0	1	0	4	4	3	25	22	21	12	13	0	14
MP3	0	0	0	1	5	12	15	17	25	21	13	2	13
RP	0	1	0	1	4	16	56	54	36	22	25	6	20
RPE	2	2	0	3	17	28	51	73	58	36	42	8	56
RPN	0	0	0	2	15	13	41	50	37	21	18	6	27
RPS	0	0	2	4	21	37	127	150	129	59	35	8	62
S1	0	7	0	4	22	37	123	139	113	76	56	18	80
S2	0	7	3	5	22	26	116	132	97	44	36	12	43
S3	0	3	1	1	11	34	70	80	57	29	36	9	48
SW	0	0	1	3	6	15	23	31	23	17	16	3	24
SW1	0	0	0	0	1	0	4	1	0	1	0	0	2
VN	0	2	1	1	1	7	11	26	12	12	18	8	16
VNe	0	1	0	1	9	5	19	12	13	6	8	4	7
VNs	0	0	0	0	0	0	5	9	6	1	9	1	13
VSW	0	1	0	0	3	0	9	8	9	12	12	3	5
VSW2	0	0	0	0	2	4	3	9	1	4	5	3	4
T 2 Medium	4	46	11	72	268	528	1377	1681	1372	779	657	190	854
LONG													
CW5	0	0	0	2	2	4	10	13	4	3	2	1	0
T 2 Long	0	0	0	2	2	4	10	13	4	3	2	1	0
ZONE 3													
SHORT													
MT	0	0	1	1	0	0	12	17	14	10	10	3	5
T 3 Short	0	0	1	1	0	0	12	17	14	10	10	3	5
MEDIUM													
CW3	1	0	3	2	11	25	67	89	75	54	44	15	48
GC	1	4	7	9	29	58	130	206	183	114	86	24	103
GC1	0	0	0	0	3	0	12	20	12	16	7	1	7
GC2	1	6	1	12	36	52	142	236	220	143	89	36	132
WB2	1	0	0	0	8	9	15	20	8	3	5	3	3
T 2 Medium	4	10	11	23	79	143	360	566	510	335	229	81	293
LONG													
CH	0	0	0	0	0	1	1	0	2	0	1	0	0
MTC	0	0	0	2	10	16	37	29	35	26	29	7	18
WB1	0	0	0	3	3	2	2	2	1	1	5	0	0
T 3 Long	0	0	0	2	13	20	40	31	38	27	35	7	18
No. Permits	40	124	38	151	655	1266	3359	4255	3585	2239	1807	618	2246
%	0.2%	0.6%	0.2%	0.7%	3.2%	6.2%	16.5%	20.9%	17.8%	11.0%	8.9%	3.0%	11.0%

