

Consultation on emission-based parking charges

Response from the Liberal Democrat group

Summary

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 councillors.

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 ie 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 - ie 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 councillors. 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 councillors 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 – ie 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.