

<b>REPORT TO:</b>	<b>Executive Director PLACE for key decision 15 August 2019</b>
<b>SUBJECT:</b>	<b>OBJECTIONS TO EMISSION-BASED PARKING PERMIT CHARGES AND DIESEL SURCHARGES FOR PERMITS</b>
<b>LEAD OFFICER:</b>	<b>Steve Iles, Director of Public Realm, Place</b>
<b>CABINET MEMBER:</b>	<b>Councillor Stuart King, Acting Cabinet Member for Environment, Transport &amp; Regeneration (Job Share)</b>
<b>WARDS:</b>	<b>All</b>
<b>CORPORATE PRIORITY/POLICY CONTEXT/AMBITIOUS FOR CROYDON:</b>	
<p>The emission-based parking charges contribute towards the aims of the Corporate Plan for a cleaner and more sustainable environment, and happy, healthy and independent lives.</p> <p>The drivers for the emission-based charges are Croydon's Air Quality Action Plan 2017-22, which aims to reduce exposure to air pollution and raising awareness for those who live and work in Croydon, and the Parking Policy incorporating elements of the National Clean Air Strategy 2019, which aims to clean up the UK's air and reduce the damaging impact air pollution has on public health, including the harmful emissions from vehicles amongst other sources, and the Mayor's Transport Strategy 2018, which prioritises public health and aims to reduce car dependency.</p>	
<b>FINANCIAL IMPACT:</b>	
<p>The required capital expenditure of £38k will be funded via a bid to Growth Board. The annual £110k revenue expenditure will be met from revenue generated from the emission-based permit sales. Revenue generated is expected to decline in future years as owners gradually replace vehicles with lower emission models for lower permit charges. It is noted that the Road Traffic Regulation Act 1984 (RTRA) is not a fiscal measure and does not authorise the authority to use its powers to charge local residents for parking in order to raise surplus revenue for other transport purposes.</p>	
<b>FORWARD PLAN REFERENCE: The decision in recommendation 1.2 is a key decision - 0319PL</b>	
<b>RECOMMENDATIONS:</b>	
<p>That in accordance with the delegation from Cabinet dated 25 March 2019, that the Executive Director Place, having consulted with the Cabinet Member for Environment, Transport and Regeneration (Job Share):</p>	
<b>1.1</b>	Consider the responses received to the formal consultation on the proposed introduction of emission-based parking permit charges.
<b>1.2</b>	Agree to introduce emission-based parking permit charges and diesel surcharges for permits as detailed in Appendix 1
<b>1.3</b>	Agree for officers to inform the objectors of the above decision and reasons.

- 2.1** The proposed parking charges structure, see Appendix 1, is a means to influencing car ownership and use. It therefore has a role to play in addressing the borough's air quality and public health challenges.
- 2.2** The introduction of emission-based parking addresses over-arching national, regional and local drivers with an aim of reducing emissions in Croydon.
- 2.3** A Public Notice of consultation was given on 23 May 2019, inviting objections by 20 June 2019. The Notice and proposed parking permit charges are included in Appendix 2.
- 2.4** 1,039 objections were received, equivalent to 10% of parking permit holders by quantity. The consultation has not identified any material objections which officers consider would invalidate the objectives for introducing emission-based parking charges.
- 2.5** The required capital expenditure of £28k in 2019/20 and £10k in 2020/21 will be funded via a bid to Capital Growth. The emission-based parking permit charges will incur additional expenditure and income. The costs of implementing the new charging structure will become operationally self-financing by year 2 and is expected to peak at £162k surplus in 2021/22. This surplus is expected to decline in the following years, as a result of owners gradually replacing vehicles with lower emission models for lower permit charges. It is noted that the Road Traffic Regulation Act 1984 (RTRA) pursuant to which any such changes to parking charges would be introduced, is not a fiscal measure and does not authorise the authority to use its powers to charge local residents for parking in order to raise surplus revenue for other transport purposes.
- 2.6** This report details the objections and officer responses to these objections and recommends support for the introduction of emission-based parking charges and diesel surcharges for permits.

### **3 DETAILS**

#### **3.1 POLICY BACKGROUND**

- 3.1.1** The introduction of emission-based parking charges addresses over-arching national, regional and local drivers with an aim of reducing emissions. The full list of these initiatives can be found in the Cabinet report of 25 March 2019 for the introduction of a Parking Policy, which can be accessed via the following link:

<https://democracy.croydon.gov.uk/documents/s14463/Parking%20Policy%20report.pdf>, however, some specific examples include:

- The National Clean Air Strategy 2019, with aims to clean up the UK's air and reduce the damaging impact air pollution has on public health, including the harmful emissions from vehicles amongst other sources,
- The national Road to Zero Strategy aims for 50-70% new car sales to be Ultra Low Emission Vehicles (ULEVs) by 2030 and to enable the rollout of supporting Electric Vehicle (EV) infrastructure and reduce emissions already on the roads.
- The Mayor's Transport Strategy 2018, which prioritises public health and aims to reduce car dependency,
- Croydon's Air Quality Action Plan 2017-22, which aims to reduce exposure to air pollution and raising awareness for those who live and work in Croydon.

- 3.1.2 As the borough continues to grow in population and density the policy on emission-based parking charges aims to improve the environment by delivering actions that will encourage and enable a lesser reliance on cars, a change to lower emitting vehicles and better management of the demand on the kerbside.
- 3.1.3 The number of cars registered in Croydon grew from 132,572 in 2001 to 148,256 in 2016 (latest analysis). 10,000 of this growth occurred in the latter 3 years.
- 3.1.4 When demand for parking in a location now exceeds the available kerbside space, occupiers are faced with the choice of parking in neighbouring locations or giving up the car. Emission-based charges would help influence the choices of those who are able to give up the car. This includes owners of infrequently used cars, which most of the time obstruct access, and multiple car households, who take up more than a proportionate share of space. The emission-based charges would also encourage a switch to lesser polluting cars, which on average tend to be smaller in size and impact less on available space and public realm.
- 3.1.5 Every car journey starts and ends with a parking space. The parking charges structure is therefore an important means to influencing car ownership and use. Parking management therefore has a role to play in addressing the borough's air quality and public health challenges. Many elements of car ownership and usage costs are already being used to influence behaviours, including road tax, diesel fuel duty and differential congestion charges, but these are national or regional schemes.

There are currently insufficient borough level measures and tools in place to address areas of localised matters in air quality, to support active travel, to reduce external traffic and to accommodate planned and future Growth Zone and suburban intensification.

- 3.1.6 The Cabinet report of 25 March 2019 set out that it was considered that the discount offered, relative to the highest charge band 5, must be sufficient to create a real incentive for a car owner to switch to a lower emission car – i.e. if the charging differential is too low then it would not, in itself, encourage a switch to a lower emission car. By this concept, the lowest charge band 1 must therefore be perceived as exceptionally attractive, while the highest band 5 must be perceived as high.

The proposal for 5 emission bands is a trade-off between system complexity and encouragement effect. 5 bands mirror what most London boroughs have chosen. The lower 2 bands represent zero emission electric vehicles and low emission hybrid vehicles respectively. The upper limit of 75g/km is aligned to the governments low emission car and van grants scheme ([www.gov.uk/plug-in-cars-van-grants](http://www.gov.uk/plug-in-cars-van-grants)). Band 2 covers most Plug-in Hybrid Electric Vehicles (PHEV), Range Extended (REX) hybrids and some Mild Hybrid (electrically assisted for a degree of energy saving) vehicle models. The weblink above demonstrates how some large car and van models will qualify for the reduced Band 2 charges.

In 2018, the government reassessed the CO2 emission figures for some so-called Mild Hybrids and Parallel Hybrid models, which have driver selectable powertrains and can effectively be driven permanently in petrol/diesel mode. As result, several of these models now figure above the 75g/km Band 2 threshold, whereas prior to 2018 they would have been below.

- 3.1.7 Band 3, for all permit types, currently covers the largest proportion of parking permits. The resident permit in Band 3 increases from £80 to £104 (30%), to reflect the objectives for managing kerbside space and air quality. The £80 charge was set in

2013. The ONS Retail Price Index has increased 15% since. The continual growth in car ownership has made space a premium within the parking congested CPZs, resulting in insensitivity to charges and worsening in parking congestion. The £80 charge is therefore no longer effective in managing space demand. Residents with multiple cars or infrequently used cars need encouragement in choosing whether they can do without one or more cars, many of which are parked for longer periods of time taking up kerb space where parking congestion affects access and impacts on public realm. If band 3 was kept at £80, then it would also not present a call or incentive for owners to switch to lower emissions.

3.1.8 There were 10,636 active parking permits at the at the end of 2018, as follows:

- 9,048 resident permits.
- 285 business permits.
- 107 all-zone permits (on-street only).
- 36 all-zone permits (on and off-street).
- 24 doctor bay permits.
- 475 council permits (e.g. Social Services home visiting staff).
- 411 neighbourhood Care permits (e.g. NHS care in the community staff).
- 80 statutory undertaker permits.
- 170 charity permits.
- 1,540 visitor permits (day permits issued over the 2018 calendar year).

3.1.9 Three parking permit types will not be subjected the emissions-charge banding:

1. 6-week temporary resident permit, which is issued while a resident is in process of moving house or changing car, and while the DVLA document for verifying the vehicle's CO2 emission is therefore not available.
2. Disabled companion badge, which in some circumstances is issued to support a disabled blue badge. The badge is exempt from parking charges, although its issue has a small administration fee.
3. Croydon Neighbourhood Care Association permit. This accounts for a small number of free issued permits (currently 6) permits, which are not vehicle specific. They are shared between about 300 charity volunteers supporting the disabled and elderly/frail in the community.

3.1.10 If introduced, the emission-based charges will be launched in three stages (the first 2 stages being the recommendation of this report):

- 1) Residents' permits – from October 2019, when a permit is next up for renewal in the 12-month period that follows.
- 2) Business and other permits, and Diesel surcharging for permits – from April 2020.
- 3) On-street (i.e. in public roads with pay and display bays) and off-street (i.e. in council operated public car parks) parking charges, and Diesel surcharging for on- and off-street parking – from April 2021 (NB: to be developed and consulted on at a later date, see 3.1.11 below).

3.1.11 The time window for consulting on a proposed Traffic Management Order for the introduction of on and off-street emission-based parking charges is not yet open and this stage of the scheme has some technical dependencies that are still to be established. It is envisaged this consultation will take place in 2020-21, in advance of its proposed introduction.

## 3.2 PRIOR ENGAGEMENT

- 3.2.1 A survey the Air Quality Action Plan (AQAP) in July 2017 found 76% of 356 respondents rated their views on air pollution as 'very important' and a further 14% rated their views as 'important'. 88% agreed that the AQAP healthy streets initiatives are important.
- 3.2.2 A survey on the future of transport for the draft third Local Implementation Plan (LIP3) in September 2018 found that 74% of 994 respondents are concerned about air quality in Croydon and 72% agreed that traffic levels should be lowered.
- 3.2.3 An engagement survey on the draft Parking Policy, in March 2019, described the objectives and timeline for introducing emission-based parking charges. In this prior engagement:
- When residents were asked open ended questions on the views and impacts from parking charges, and specifically highlighting emission-based charges:
    - 25% expressed concerns.
    - 16% expressed support.
    - 60% were neutral, neither concerned nor supporting.
  - 11% of respondents expressed a concern that the policy on emission-based charges would impact disproportionately on low income residents, who cannot afford to replace their car.
  - 3% were concerned about the diesel surcharge being unfair to owners, who in the past were encouraged to buy diesel.
  - 3% were concerned emission-based would have a negative impact on Croydon and the High Street economy, including pushing affluent shoppers in big cars out of town.

The various concerns are considered in the final proposal and responses (section 3.3.2 below). As part of the approval of the revised charges, it is proposed, with a view to reducing the complexity of the scheme, to recommend to the Executive Director that the Council permit (mainly Adult and Children Services) and Neighbourhood Care permit (mainly NHS) be merged into a single Community Care permit; and to merge the two All-zones permits into a single one. It is also suggested that the visitor permit is reduced to 3 emission bands, to align with the future envisaged on-street charges structure.

### **3.3 STATUTORY CONSULTATION**

- 3.3.1 A Public Notice was given on 23 May 2019, with a 4-week consultation period until 20 June 2019 (see Appendix 2). This is 1 week longer than required by the statutory procedure. The Notice details the proposed emission-based parking charges and invites objections. The communication of the Notice have included:
- Publication in the London Gazette on 23 May 2019.
  - Publication in the Croydon Guardian on 23 May 2019.
  - Email notification on 23 May 2019 to 96 interest groups throughout the borough, including the 3 emergency services.
  - Email notification on 24 May to 13,738 current and past parking permit holders, who have provided their email address as a means of contact.
  - Letter notification on 23 May to 310 permit holders, for who an email address is not held.
  - 8 Tweets, spaced about 4 days apart.
  - 1 Facebook post.

- 1 Your Croydon article.
- 1 Our Croydon article.
- 1 Schools Bulletin article.

The first 24 hours following the email communication generated the highest daily number of online survey responses, signifying that the 10,636 active permit holders were effectively reached. It is unavoidable that in a mass-communication, including a portion of historic email and postal addresses, some notifications were not read by the intended recipients. The emails were specifically designed to best avoid the triggers used by common junk mail filters. In other cases, the recipients are no longer active or have gone away. 162 of the emails were rejected as undeliverable.

In the consultation responses, 9 respondents state they did not receive the direct notification about the consultation. Separately, the project has received 3 contacts from permit holders raising concern over not having received the notification email. After verification and follow-up, 1 of the contacts acknowledged that the email may in fact have been received, but it wasn't noticed. Another acknowledged that a defunct email address may have been provided. The third contact did not follow up, but has responded to the consultation.

In the consultation responses, 1 respondent states an opinion that every household in the borough should have been sent a consultation letter about the permit charges, instead of just contacting permit holders.

### 3.3.2 Total 1,149 unique respondents replied end of 20 June 2019:

- 1,039 respondents object or are concerned.
- 62 respondents are in support.
- 48 respondents make comments that are neither an objection nor support.

NB: Multiple unique comments made by the same single respondent are separated and counted as multiple unique comments, including when the respondent made multiple submissions to the consultation. Multiple identical, repeat comments made by the same single respondent are counted as 1 comment. In total, 1149 unique respondents made 1167 unique comments.

All 1,149 responses, are available as Appendix 3 to this report in an anonymised format.

For purpose of making a meaningful report on the extensive consultation and its high number of responses, those statements that are highly similar are grouped into identical summary statements. These statements have been considered collectively and will receive officer comments. Other statements are unique and have been addressed individually below.

30 (3%) addresses have submitted 2 or more responses, from differently named individuals. All of these responses are accepted and considered as individual responses.

91 (9%) respondents have submitted more than one response. The multiple responses from each these 91 individuals are merged into a single response, for each individual, encompassing all of the points they have made. No comments have been ignored, but repeated identical comments from a single individual are counted as one comment, from one respondent.

55 (5%) respondents have provided insufficient address information to enable a reply. All comments in these 55 responses are accepted and considered, but cannot

practically be replied to. The respondents concerned have the opportunity to read the responses made in this report, which is placed in the public domain.

3.3.3 The statutory procedure is to invite and respond to objections. The 62 (5%) responses in support for the emission-based permit charges are noted, but do not require responses under the statutory procedure. They will nonetheless receive a reply acknowledging their contribution. Example responses in support of the proposals include:

- *“I agree with the proposal. We need to encourage the adoption of low/zero emission vehicles and do more to discourage the use of those that are polluting the air quality for residents”.* [ID 118]
- *“I want to support the scheme – it is an excellent idea”.* [ID 396]
- *“After looking at the costs of the permits I think emission based parking is a good idea. We have 2 cars in our family home, one of them registered before 2001. We will be getting rid of this car as we don't really need it, or drive it much. It is a higher polluting vehicle and it will save us money in the long run if we dispose of it and hopefully help our environment. Yippee. Well done Croydon Council”.* [ID 1015]

The 48 (4%) of responses that cannot be reliably interpreted as either for or against emission-based parking charges will receive a reply stating there was no point to consider. Examples of such other responses include:

- *“I have no objection to the policies that the council intend to impose, but how will this reflect on busses, taxis and emergency vehicles?”* [ID 420]
- *“My car is hybrid so limited impact”* [ID 440]
- *“My partner never has anywhere to park close to my house when he visits. I don't own a car, many of my neighbours have 2 or 3!”* [ID 691]

3.3.4 Tables 1 and 2 summarise the 145 similar and unique objections and the project officer's responses.

NB: Multiple unique comments made by the same single respondent are separated and counted as multiple unique comments, including when the respondent made multiple submissions to the consultation. Multiple identical, repeat comments made by the same single respondent are counted as 1 comment.

**Table 1** – Top 37 grounds for objection, which more than 10 respondents have commented on. They are ranked in order of the number of respondents commenting.

Objections and officer's response
<p><b>217 respondents (19%) commented:</b></p> <p><b><i>The Council is only doing this to generate income. It is a stealth tax, taking advantage of car owners.</i></b></p> <p><u>Officer response:</u> Using parking schemes as a means to raise income would be inconsistent with the Road Traffic Regulations Act 1984. The charges are determined to meet the traffic management objectives for reducing the number of cars on the road and air pollution. There is no related experience that will help model the exact effects from the new charges on car ownership and the number of parking permits issued.</p>

Surplus from parking charges are ring-fenced and, for example, contribute significantly to sustaining public transport fare concessions such as the Freedom Pass.

The new charges are considered necessary to influence the otherwise continuing increase in the number of parked and driving cars on the road in the Borough. Since the permit charges were last reviewed in 2013 there has been a 7% growth in the number of vehicles registered in Croydon. This has meant that there is an increasing pressure for parking spaces and drivers have become de-sensitised to the charges applied, hence reducing their effectiveness for demand management. The permit charges set in 2013 are currently too low for achieving the parking management objectives. This is evident in the number of respondents to this consultation saying it is too difficult to find a parking space. This results in residents circulating the neighbourhood in search for a parking space which inevitably adds to congestion and air pollution.

**154 respondents (13%) commented:**

***The emission-based charges are unfair to those who cannot afford a newer car, which includes the poorest, elderly and vulnerable.***

Officer response:

In Croydon an Air Quality Management Area (AQMA) has been declared for the whole of the borough, for failing to meet the EU annual average limit for air pollutants. The national Clean Air Strategy 2019 and the London Mayor's Strategy require actions to reduce NOx and particulate matter emissions mainly at a local level. If parking charges were to be maintained at a lower level, then it is considered unlikely to influence a sufficient number of owners in their next car choices or indeed choices to have two or more vehicles and this in turn would impact negatively on the overarching objectives, as set out in paragraph 3.1.1. Residents and local businesses for whom parking and road congestion have adverse economic and quality of life implications include people who cannot immediately afford to replace their older cars. We must also consider fairness to residents who are vulnerable to air pollution, which disproportionately are the young, the elderly and those who live in some of the poorest areas of the borough. They represent groups that tend to have lower car ownership.

Active encouragement of lower emission vehicles and the underlying reduction in car use, benefits all individuals, families and neighbourhoods. Air pollution is an important and increasingly more high profile public health issue, contributing to illness and shortened life expectancy. It disproportionately impacts on the most vulnerable in the population, in particular the sick, young and elderly. Those at higher risk include those with existing respiratory problems and chronic illnesses such as asthma and chronic obstructive pulmonary disease. People who live or work near busy roads are at particularly high risk of exposure to the health harms of air pollution.

Surplus from parking permit charges are ring-fenced and, for example, contribute significantly to sustaining public transport fare concessions such as the Freedom Pass scheme for the elderly. The parking permit charges therefore indirectly support the portion of the elder population that do not have a car or who choose to use public transport.

The holders of 11,459 individual and 71 organisational blue badges issued in Croydon are exempt from the parking charges.



In context of the 148,256 (in 2016) vehicles registered in Croydon, the higher £300 band on resident permits accounts for 371 vehicles in the highest emission group and 413 that predate Mar 2001. This equates to 8.7% of all active resident parking permits (9,048) as at the end of 2018, which are issued to residents across the whole income spectrum. Proportionally, the higher charge will apply to a very small number of residents on low income. The proposed charges can therefore not be generalised as having a disproportionate effect on residents with low income.

**128 respondents (11%) commented:**

***Oppose or strongly oppose the emission-based parking permit charges, but without providing any grounds.***

Officer response:

The opposition is noted.

**119 respondents (10%) commented:**

***The emissions charges are unfair to owners of little used cars, who offset by frequent walking, cycling or public transport use. Parked cars do not pollute. This is not polluter pay.***

Officer response:

Firstly, the charges are not only increased for the high-polluting vehicles, but they are also substantially reduced for low-polluting vehicles. This presents an opportunity for people who use the car infrequently, to eventually lower their parking costs by choosing a lower emission model at their next car choice.

Cars are generally owned for purpose of driving. When the parked car is driven, it contributes to pollution. All car ownership therefore contributes to pollution, in various amounts. The adoption of lower emission vehicles amongst parked cars will contribute to improved air quality.

A sizable number of respondents in this consultation express concern about daily problems of not being able to find a parking space near to home. Infrequently used cars also occupy the over-subscribed kerbside space in residential roads. They therefore contribute equally to access difficulties and impact on the public realm. A number of respondents to this consultation say it is currently too difficult to find a parking space in their CPZ. The necessity that residents circulate the neighbourhood in search for a parking space adds to congestion and air pollution.

Cars that remain parked for longer periods of time, reduce the number of available parking spaces which indirectly increases the circulation of traffic which is searching for parking spaces. Some of these little used cars, and second or third cars, could be candidates for conversion to shared pool car uses or other alternatives to car ownership. The emission-based charges will help encourage this. The Council has a policy to support the expansion of car share schemes.

The permit charge must be an influencer for those who are able and willing to consider the alternatives to car ownership and the emission-levels in their next car choice. If permit charges were to be set at a lower level then it would not influence a sufficient number of owners in their next car choices or support the objectives as detailed in this report at section 3.1.1.

**65 respondents (6%) commented:**

***Drivers are taxed enough already.***

Officer response:

The continual growth in the number of cars on the road indicates that ownership is overall, becoming more affordable. Many elements of car ownership and usage costs are already being used to influence behaviours, including road tax, diesel fuel duty and differential congestion charges in London. However these are national or regional schemes, which tend to be moderated for the general national denominator and Central London. These measures are insufficient to help stem the number of cars on the roads in Croydon, where the number of vehicles registered in the borough has grown 7% since 2013.

The national Clean Air Strategy 2019 devolves responsibility to further reduce the damaging impact air pollution has on public health, mainly to a local level. The London Mayor's targets for car use reduction in outer boroughs are similarly devolved to local levels. Without the introduction of emissions-based parking charges it is considered that there would be insufficiency in addressing the public health concerns locally.

**64 respondents (6%) commented:**

***Parking and permits are expensive enough already.***

Officer response:

The proposed permit charges for the 2 lower emission bands are lower than the current pre-existing charges of £80, and this represents an opportunity to obtain a lower priced parking permit when next choosing a car. The other 3 bands serve as an encouragement to adopt cars with lower emissions or to reconsider non-essential car ownership.

The forecast model based on assumptions of changing car ownership, shows a net increase of 13.5% remains less than the 15% ONS Retail Price Index increase, since the permit charges were last reviewed in 2013.

Many respondents to this consultation have expressed concern over the lack of availability of parking spaces, which would indicate that current levels of parking control measures are not achieving their objectives for managing access.

The permit charges set in 2013 are currently too low to support access and to encourage a switch to lower emission cars. The differential in the charging bands must be sufficient to encourage low emission and to discourage high emission. Narrowing the charging differential, to lessen the permit charge for high-polluting vehicles and second cars, would detract from meeting the parking management objectives. The new charges are required to influence a necessary change.

**63 respondents (5%) commented:**

***Diesel is getting unfair press and owners were encouraged to buy diesels.***

Officer response:

The diesel surcharge will only apply to vehicles that are more than 4 years old.

The national policy on favouring diesel started to progressively reverse in 2009, when the scrappage scheme was also introduced for older cars. According to the Society of Motor Manufacturers and Traders, the growth in the registrations of new diesel cars levelled off in 2015 and has since been in decline. Diesel currently continue to have a positive role in wider CO2 reduction, in particular for motorway driving where pollution disperses more easily. Older diesel cars, however, contribute disproportionately to NOx in build-up urban areas.

The national Clean Air Strategy 2019 has devolved responsibility for further reducing urban NOx emissions mainly to a local level. The Mayor has introduced ULEZ in Central London and there is a requirement that the outer London boroughs implement local Air Quality Action Plans. NHS data shows that Croydon currently have the highest rate of hospital admissions for childhood (0-9 years) asthma in London. 7.5% of premature deaths in Croydon are linked to air pollution. Failing to address NOx and particulate matter emissions from older diesel (and older petrol) cars in Croydon would deprive many local people of their ability to breathe safe air.

Several manufacturers currently operate diesel scrappage schemes, offering between £2,000 and £6,000 discounts. A national grants scheme for electric vehicles currently covers up to 35% (to max £3,500) of a car's price, or 20% (to max £8,000) for vans. This subsidy opportunity is available to owners of older diesel vehicles.

**42 respondents (4%) commented:**

***The charges are unfair to the poor and vulnerable. People on low and high incomes all have an equal right to park.***

**23 respondents (2%) commented:**

***I cannot afford to pay the increased charges.***

**4 respondents (<1%) commented:**

***This will cause me severe financial hardship. Forces me to sell my house. Forces me to resign from my job and claim benefits instead.***

**1 respondent (<1%) commented:**

***The scheme does not consider the car owner's financial status.***

**1 respondent (<1%) commented:**

***Are people claiming benefits and own a car going to be let off charges?***

Officer response:

Any change to fee structures will have an impact on local residents and it is important to note that the forecast model based on assumptions of changing car ownership, shows a net increase of 13.5% remains less than the 15% ONS Retail Price Index, since the permit charges were last reviewed in 2013.

The permit charge will remain a relatively modest element of the total cost of car ownership. Compared to all other associated costs of owning a car, permit charges would be a minimal percentage of the overall cost.

**41 respondents (4%) commented:**

***Unfair to residents living in a CPZ, while not addressing high-polluting cars outside CPZs. It is unequal and creates divisions in the community.***

Officer response:

The CPZ represents a location where residents have reported significant parking congestion and requested that such congestion is managed. In non-CPZ locations, the congestion either does not exist to the same level or has not been raised as a concern yet and therefore does not need managing at this point in time. The Council does not implement CPZs where they are not necessary. In most cases the need for CPZs are within the higher density geographical areas and less so in lower density areas.

The next phases of the emission-based parking charges will address polluting vehicles traveling within the borough to public parking places in general, and not just in residential CPZs. These additional proposals cannot be immediately implemented, as they depend on the prior uptake in mobile parking payment technology, which is being addressed separately to emissions-based permit charges in CPZs.

**40 respondents (4%) commented:**

***Residents have received insufficient forewarning and time to adjust, when considering that the normal car replacement cycle. The charges could wait until next time a permit holder replaces the car, to enable a fair choice.***

Officer response:

The national Clean Air Strategy 2019 and the London Mayor's Strategy require further actions to reduce urban emissions mainly to a local level. These actions are required to start showing measurable results by 2021. Public Health (NHS) data shows that Croydon currently have the highest rate of hospital admissions for childhood (0-9 years) asthma in London and 7.5% of premature deaths in Croydon are linked to air pollution. Delaying the new charges until the next car replacement would encourage a proportion of car owners to keep their current high-emission vehicle for longer. Failing to address emissions in a timely manner would deprive many local people of safe air.

**38 respondents (3%) commented:**

***There are too few EVCPs (Electric Vehicle Charging Points) to support the transition to electric vehicles.***

Officer response:

The Council is currently rolling out on-street charging points and plan to reach 400 public charging points by 2022.

The government currently offers a £500 grant for home charging points for category 2 and 3 plug-in hybrid vehicles, which are available to new low emission vehicle owners.

**36 respondents (3%) commented:**

***Charging local residents is ineffective and unfair, when emissions are also cause by outsiders driving through or into Croydon.***

Officer response:

The first phase of emission-base parking charges addresses the most parking congested roads within residential CPZs.

The next phases of the proposed emission-based parking charges will look to additionally address polluting vehicles traveling within and into the borough, to public parking places in general. These new proposed charges cannot be immediately implemented, as they depend on the prior uptake in mobile parking payment technology, which is being addressed separately to emissions-based permit charges in CPZs.

**33 respondents (3%) commented:**

***Emissions need lowering, but this is the wrong way to go about it (not specifying an alternative solution).***

Officer response:

The Council will keep an open mind and support emissions-reduction solutions as they are identified in all fields. New solutions could be considered for replacing the emissions-based permit charges. For the emissions and car reduction to show their required effects by 2021, however, the recommended emission-based charges cannot be delayed for yet unknown and unspecified alternative solutions to be developed. Private car transport is just one aspect of local air pollution, but a major contributor to local traffic and parking congestion.

The national Clean Air Strategy 2019 devolves responsibility to further reduce the damaging impact air pollution has on public health, mainly to a local level. The London Mayor's targets for car use reduction in outer boroughs are similarly devolved to local levels. Without the introduction of emissions-based parking charges it is considered that there would be insufficient measures to influence car ownership and to address the public health concerns locally.

**32 respondents (3%) commented:**

***It is unfair to essential car users who work unsocial hours, must drive their children, are vulnerable, carry loads and live in hilly borough.***

Officer response:

Any change to fee structures will have an impact on local residents and it is important to note that the forecast model based on assumptions of changing car ownership, shows a net increase of 13.5% remains less than the 15% ONS Retail Price Index, since the permit charges were last reviewed in 2013.

The permit charge will remain a relatively modest element of the total cost of car ownership. Compared to all other associated costs of owning a car, permit charges would be a minimal percentage of the overall cost. It is, however, important to seek to influence a choice in lower emission vehicles for essential and frequent car users.

The scheme does not automatically assume that the transport of children as being essential. The Third Local Implementation Plan reflects the Croydon local plan and the London Mayors Transport Strategy, including that all local Councils must help children and parents to use cars less and walk, cycle and use public transport more.

The proposed scheme has concessions for Blue Badge holders and care charities and others as detailed in paragraphs 3.1.9 of the report.

**28 respondents (2%) commented:**

***I already pay my council tax and don't want more tax.***

Officer response:

The parking permit charges do not form part of general taxation. They are introduced to influence and achieve traffic management objectives, which include air quality considerations which form part of the national air quality strategy. Any surplus from parking charges are ring-fenced to highways and transport schemes required by the provisions of Section 55 of the RTRA and, for example, contributes significantly to sustaining public transport fare concessions.

**28 respondents (2%) commented:**

***Public transport infrastructure is inadequate, too pricy or too unfriendly to substitute for the car and will need improving first.***

Officer response:

The Council has an ongoing programme of works with the Mayor, Transport for London, Network Rail and Train Operating Companies to improve public transport links to our local high streets, including introducing new routes to better connect Croydon's places and to increase capacity. More details can be found in the Local Implementation Plan:

<https://www.croydon.gov.uk/transportandstreets/policies/third-local-implementation-plan>

**26 respondents (2%) commented:**

***It is unfair to residents who do not have private driveway.***

Officer response:

Most homes in Croydon were built in a comparatively car-free age when house builders in denser populated areas did not need to consider space for private driveways. Traditionally there was a difference in the nature of higher density urban living and lower density sub-urban living. In the future as demand for homes grows there will be an intensification of our suburbs which will require forward planning to manage the parking infrastructure.

The lack of private driveways was not a problem at the time when most residential streets in Croydon were laid out. The problem has only arisen as a result of an excessive increase in car ownership proportionate to the available road space. The solution today should look to stall or reverse the continued growth of the number of cars requiring a parking space and the impacts of car ownership relative to the impact on air quality as detailed in paragraph 3.1.1 above. The emission-based permit charges are intended to help residents re-consider non-essential car ownership.

**25 respondents (2%) commented:**

***It just increases parking costs but does still not guarantee a parking space near to home.***

Officer response:

As the borough continues to grow in population and density the introduction of emission-based parking charges aims to address overarching national, regional and local drivers with an aim of reducing emissions. Such charges would encourage a lesser reliance on cars and a switch to lesser polluting cars, which on average tend to be smaller in size and impact less on available space and public realm.

The solution to better assuring availability to a parking space is to reduce the number of cars requiring a parking space. This would mean that some residents and businesses giving up non-essential car ownership. Infrequently used cars and second and third cars are for example disproportionately occupying the over-subscribed space in residential roads. The residents who have a rarely needed car, including a second car, are candidates for considering the alternatives to car ownership. The emission-based charges will help encourage this.

**23 respondents (2%) commented:**

***There is too much development being permitted in Croydon, which results in more cars.***

Officer response:

Of the developments currently taking place across Croydon, the highest intensity projects are located close to transport and commercial centres. Residents in such developments will be within walking distance of shopping, leisure, work and public transport. The planners have therefore been able to restrict their access to permit parking bays and require more car share schemes. Although the number of residents in Croydon will increase, the developments will help dilute car ownership per head of population.

**21 respondents (2%) commented:**

***The higher £300 represents 375% increase and is unreasonably high.***

Officer response:

In context of the 148,256 (in 2016) vehicles registered in Croydon, the higher £300 band on resident permits accounts for 371 vehicles in the highest emission group and 413 that predate Mar 2001. However, these vehicles add disproportionately

more to emissions in congested residential CPZ streets. It is therefore considered important to enhance the perception of the permit charge differential, to effectively influence car ownership choices.

**18 respondents (2%) commented:**

***This will not reduce emissions. People need their cars and there will still be cars on the road.***

Officer response:

The debate that the current proposal has spurred is already proving helpful. This is exemplified by a few of the respondents to the consultation declaring that they will now give up their cars. One respondent expressed thanks to the Council for its decision to encourage the respondent to give up one of the family cars.

A further phase of emission-based parking charges is being developed to address polluting vehicles traveling within the borough to public parking places in general (i.e. on and off street parking spaces), and not just in residential CPZs. These new proposed charges cannot be immediately implemented, as they depend on the prior uptake in mobile parking payment technology, which is being addressed separately to emissions-based permit charges in CPZs.

**18 respondents (2%) commented:**

***Unfair to pre-2001 cars that have low emission or low mileage.***

**2 respondents (<1%) commented:**

***Raising permits from £80 to £300 for classic and historic cars is unreasonable.***

**1 respondent (<1%) commented:**

***Apply to vehicles registered after 2006 only, to avoid unnecessary scrapping of older cars.***

Officer response:

Standards for measuring and declaring emissions were not introduced in a controlled way until 2001. The DVLA does therefore not hold verifiable CO2 emissions data for older vehicles. Older cars were designed to lower standards and generally pollute significantly more than newer cars.

Cars are generally owned for purpose of driving. When the parked car is driven, it contributes to pollution. All car ownership therefore contributes to pollution, in various amounts. The adoption of lower emission vehicles even amongst parked cars will contribute to improved air quality.

**14 respondents (1%) commented:**

***High charges will put off people visiting Croydon and district high streets.***



Officer response:

The parking permit charges proposed in this consultation do not apply or alter the parking charges for visitors to Croydon and the district centres.

A future phase extension to the emission-based parking charges will be consulted on separately.

**14 respondents (1%) commented:**

***Unfair unless the Council contribute to replacing my car. Fund a scrappage scheme.***

Officer response:

The Council supports the London Mayor's call for a national scrappage scheme to be funded by central government.

Several manufacturers currently operate scrappage schemes, offering between £2,000 and £6,000 discounts, mainly for diesel cars. A national grants scheme for electric vehicles currently covers up to 35% (to max £3,500) of a car's price, or 20% (to max £8,000) for vans. There is also a national grant available for home charges for plug-in hybrid vehicles.

**13 respondents (1%) commented:**

***Emissions charges are not needed. There is no evidence that congestion and air quality is a concern. The AQI in Croydon is well within EU limits.***

**12 respondents (1%) commented:**

***Enough is being done to reduce emissions already and new parking charges are not needed.***

Officer response:

The national Clean Air Strategy 2019 and the London Mayor's Strategy require further actions to reduce urban NOx and particulate matter emissions mainly to a local level. In Croydon an Air Quality Management Area (AQMA) has been declared for the whole of the borough, for failing to meet the EU annual average limit for air pollutants.

Public Health (NHS) data shows that Croydon currently have the highest rate of hospital admissions for childhood (0-9 years) asthma in London. 7.5% of premature deaths in Croydon are linked to air pollution. Failing to address NOx and particulate matter emissions in Croydon would deprive many local people of their fundamental right to safe air.

**12 respondents (1%) commented:**

***If the Council is serious about air pollution then it would shut down the Beddington incinerator.***

Officer response:

The Council does not consider the emission-based parking proposal to be in

conflict to the waste service provided by our contractor, which operates an Energy Recovery Facility in compliance with the Industrial Emissions Directive and regulated by the Environment Agency.

Private car transport is of course just one aspect of local air pollution, but a major aspect of local traffic and parking congestion. Regionally, the London Mayor's targets for car use reduction in outer boroughs are devolved to local levels. Without the introduction of emissions-based parking charges it is considered that there would be insufficient local measures to influence car ownership and to address the public health concerns locally.

**10 respondents (1%) commented:**

***I object because the scheme is not aligned with ULEZ. Croydon does not exempt pre-2006 vehicles and new vehicles purchased to comply with ULEZ.***

**9 respondents (1%) commented:**

***Croydon should adopt the ULEZ congestion charge instead.***

**3 respondents (<1%) commented:**

***I object because ULEZ is coming to Croydon in 2 years anyway.***

**1 respondent (<1%) commented:**

***Such moves should at least be London wide if not country wide.***

Officer response:

The proposed scheme is not the same as the London ULEZ, which is a binary charge and is concerned with moving traffic. The London Mayor does not currently have any plan for extending the ULEZ to Croydon. The Mayor instead requires the outer boroughs to define and implement their own schemes, whether they call it ULEZ or something else and to use measures that that are appropriate for local conditions. The aim is a reduction in car ownership and use.

The Central London type congestion charging is very complex and expensive to operate. It would need to be joined up to a London-wide scheme.

Considering that every car journey starts and ends with a parking space, the parking charges structure is considered to be an important means to influencing car ownership and use in Croydon.

Table 2 – 108 grounds for objection or statements of concern, each of which have less than 10 respondents commenting. They are ordered and grouped by subject areas for easier consideration.

**Objections and officer's response**

**2 respondents (<1%) commented:**

***Paying both the ULEZ in London and emissions permits at home is being charged twice for the same thing.***

**1 respondent (<1%) commented:**

***Both Vehicle Excise Duty and Fuel Duty already tax motorists for the CO2 emissions and efficiency. The proposed Croydon charge amounts to double taxation on this basis.***

Officer response:

The national or regional taxation schemes alone are insufficient to help stem the number of cars on the roads in Croydon, which has on the latest data, grown 7% since 2013. The purpose of these charges are as detailed in paragraphs 3.1.1 to 3.1.5.

The proposed charges are about regulating context specific car ownership and use – e.g. someone parking in a congested residential street in Croydon does not necessarily drive into Central London and vice versa.

**1 respondent (<1%) commented:**

***Council data shows that the volume of vehicles traversing the “ladder streets” between Addiscombe Rd and Lower Addiscombe Rd exceeds the number of vehicles owned in the area. Imposing parking permit charges is therefore highly unlikely to have a significant impact on pollution levels in the Inner Areas.***

**1 respondent (<1%) commented:**

***The claims are not supported by any evidence linking car ownership in the CPZ areas and the levels of pollution. In effect Croydon Council applies a form of “apartheid” in terms of services, charges and quality of life that favours residents of Outer Croydon and supports their life style choices.***

Officer response:

The traffic count in the “ladder streets” is undertaken to help address the matter and monitor the effects. It is however wrong to automatically assume that the problem is majority through-traffic. It is well-established that when parking saturation exceeds 85%, then local traffic starts to circulate for finding a vacant parking bay. The Department for Transport quote a study suggesting that the average UK driver spends 90 hours/year (~4 days) searching for parking. Such number varies between locations, but it is reasonable to say that residents and visitors in the “ladder streets” make a not insignificant contribution to the traffic counts. Other respondents to this consultation tell that they too often have to drive around the block until a bay becomes vacant. The high rate of car ownership is a principal contributor to traffic circulation. The emission-based charges alone will not reduce car ownership to a level achieving 85% bays occupancy, to eliminate the needs to search for a space. But even a more modest number of residents choosing the alternative to the car will be helpful. And, if the vehicles circulating the area on average are lower emission, then this will have a more positive impact in terms of air quality than if that vehicle is of a higher emission.

**1 respondent (<1%) commented:**

***This will reduce car ownership, creating clearer roads for increased through traffic with no net effect on air quality.***

Officer response:

The reduction in car ownership will contribute to a reduction in internal traffic and traffic circulating the congested roads in search for a parking space. This will reduce transport related air pollution. Through traffic tends to be confined to the artery roads, as opposed to the internal road network, and it is not considered that arterial volume will increase as a result of introducing emission based parking permit charges and diesel surcharges for permits.

**2 respondents (<1%) commented:**

***This is flawed. You are basing it mostly on CO2 which is harmless to humans.***

**2 respondents (<1%) commented:**

***The Council should help suppress NOx, instead of seeking to reduce CO2 emission. Leave CO2 to national and international agencies.***

Officer response:

Although there is international consensus that transport related CO2 emissions contribute undesirable greenhouse gasses, they are not the primary focus of the Croydon emissions scheme. Greenhouse gas emissions are subject to international treaties, which in the UK are addressed nationally through various policy measures.

The emissions of concern to local public health are NOx and particulates. NOx emissions correlate to CO2 emissions – i.e. high CO2 emission generally means high NOx emission – except for pre-2015 diesel vehicles for which NOx tended to be significantly higher. CO2 is the only verifiable measure that is held on the vehicle registration document, which is the practical reason for using it as the banding variable.

**2 respondents (<1%) commented:**

***Research shows that broadly half of the harmful air pollution emitted by vehicles comes from particulate matter emitted by brakes and tyres, alongside what is sometimes called "road dust", which can account for up to 90% of PM10 in certain urban environments. Every car contributes to this air pollution, regardless of fuel type or carbon emissions.***

Officer response:

Although there is general consensus that the nation should be concerned about 'road dust', the health effects from particulate matter (PM), and particularly the differences between PM10 and PM2.5 (nb: particulate matter is described by its size or aerodynamic diameter which governs how far it can get into the air passages of the respiratory system), is not well understood. There is on the other hand evidence of a correlation between high NOx emission days and hospital

admissions for asthma related exacerbation. NOx and particulates tend to occur together from internal combustion engine road vehicles and are generally considered as a combined problem. The NOx element of this problem, the one confirmed to cause harm, is reduced from lower emission vehicles which is the focus of the proposed changes to parking charges.

The creation and disturbance of 'road dust' relate to car use, which largely relates to car ownership. It is expected that the emission-based parking charges will help to indirectly influence a behaviour change of car use. Many car journeys could easily be walked or cycled instead of driven by car. A subsequent phase will propose emission-based charges in destination parking places, which would further discourage car use – and the creation and disturbance of 'road dust'.

**1 respondent (<1%) commented:**

***The argument that CO2 based parking charge will encourage people to switch to lower emitting vehicles is simply not borne out by the research. The VED was reformed in 2016 to capture the CO2 emissions in the 'first year rate', followed by a flat rate charge, is precisely because research showed that it is up-front price that affects purchase decisions, not the prospect of recurrent charges.***

Officer response:

The proposed scheme is aimed at encouraging behaviour change for the next car choice and it will help overcome the inertia held by many owners of high-polluting vehicles, who know it is bad but do not hear enough about the consequences to consider the alternatives. Already at the consultation stage of the current proposal, respondents have commented that they will now give up their car or change to a lower emission model next.

To create a charging structure that mirrors the current Vehicle Excise Duty (VED) model, i.e. by introducing a significantly higher 'first year rate', when owners change vehicles, would most likely be unacceptable to local permit holders. This is because invariably the 'first year rate' will be higher than the previous year's flat 'subsequent rate'. This would easily end up as an argument for holding out against a switch to lower emissions. Residents need to perceive a reward, not a penalty, from choosing a lower emission vehicle.

**1 respondent (<1%) commented:**

***Why complicate things?***

**9 respondents (1%) commented:**

***I have a car, what will it mean to me? How do I calculate the new charge?***

**6 respondents (1%) commented:**

***I need more details about the scheme.***

**5 respondents (<1%) commented:**

***Visitor permits are becoming too complicated. How will I know the CO2 emission of my visitor's car?***

Officer response:

The proposed emissions bands for this authority are a simplification of the VED bands. The number of bands have to balance incentive, fairness and complexity. Other respondents in this consultation in fact find the 5 bands too complex. The number of 5 bands was selected as a best compromise and which many other London Boroughs have also settled for.

The CO2 emission value and the banding is calculated automatically when entering the vehicle registration number, when applying for a permit or recording a visitor. All the driver has to do is to key in the registration number. The system collects the data electronically from the vehicle registration data held at the DVLA.

**1 respondent (<1%) commented:**

***The emission bands should align to the VED bands. It is unfair to group majority of drivers into the increased middle band charge.***

**1 respondent (<1%) commented:**

***Proposed bands do not reflect the existing car tax bands. Why complicate things?***

**1 respondent (<1%) commented:**

***I object that pre-2001 cars are not banded by engine size.***

Officer response:

The proposed emissions bands are a simplification of the VED bands. The VED has two tables of 13 bands and differentials for the first and subsequent years. This would be a complex system to apply to parking permits locally.

The number of bands have to balance incentive, fairness and complexity. Other respondents in this consultation in fact find the 5 bands too complex. The number of 5 bands was selected as a best compromise and one which more other London Boroughs have also settled for.

**3 respondents (<1%) commented:**

***If the car is zero road tax then it should be zero parking charges.***

Officer response:

The road tax and parking permit charges address different objectives and cannot be automatically correlated. The national or regional taxation schemes alone are insufficient to help stem the number of cars on the roads in Croydon, which has on the latest data, grown 7% since 2013. The purpose of these charges are as detailed in paragraphs 3.1.1 to 3.1.5. The proposed emission charges in Croydon are about regulating specific car ownership and use – e.g. someone parking in a congested residential street in Croydon does not necessarily drive nationally and vice versa.

**2 respondents (<1%) commented:**

***I object because outside the operating times of a Controlled Parking permit zone, within the London Borough of Croydon, it is currently lawful without any financial payment required, to park most motor vehicles, owned by Residents, Businesses and Visitors of and to our borough, unless causing obstruction of the highway, anywhere and at any other time, on a space which is not a bay, for which a permit is required.***

***As a consequence of the greed of the council and unrequited cost to all those above, there would obviously be less revenue to Parking Services due to responsible motorists leaving vehicles in such places above, displaced to, for example yellow lines etc.***

**2 respondents (<1%) commented:**

***This will cause parking displacement into non-CPZ roads.***

Officer response:

The proposed emission-based parking charges do not alter the conditions for where and when a vehicle can park. The CPZ represents a location where residents have reported significant parking congestion and requested that such congestion is managed. Parking displacement into non-controlled roads is occurring already and will continue to grow in pace with car ownership. The proposed emission-based parking permit charges scheme is a long-term measure that will help this, while simultaneously helping to reduce emissions. Parking revenue is not a consideration with the focus on being on behaviour changes.

**9 respondents (1%) commented:**

***Unfair that permit charge will increase for sub-100g/km cars and hybrids, which are just outside Band 2. Raise Band 2 threshold or introduce an intermediate band separating my car from big salon cars.***

Officer response:

The upper limit of 75g/km is aligned to the government's low emission Category 1, 2 and 3 car and van grants scheme ([www.gov.uk/plug-in-cars-van-grants](http://www.gov.uk/plug-in-cars-van-grants)). Emission Band 2 covers most Plug-in Hybrid Electric Vehicles (PHEV), Range Extended (REX) hybrids and some Mild Hybrid (electrically assisted for a degree of energy saving) vehicle models. The weblink above demonstrates how some large car and van models will qualify for the reduced Band 2 charges.

The number of bands have to balance incentive, fairness and complexity. Other respondents in this consultation in fact find the number of bands too complex. The number of 5 bands was selected as a best compromise and one which more other London Boroughs have also settled for.

**3 respondents (<1%) commented:**

***I drive long distances on motorways, including holidaying in Europe, for which a slow recharging electric car is unsuitable. All electric is not an option for me. The scheme discriminates against me.***

Officer response:

The reduced £65 charge band does not preclude certain vehicle models that can be suitable driven for long distances on motorways. Although the recharge time can be an issue for some drivers, it is today not unusual to see vehicles that would fall into the £6.50 band travelling long distances on motorways.

**1 respondent (<1%) commented:**

***Why should a local resident pay an additional charge aimed at curbing congestion or improving air quality when, for instance, parents driving a short school run would escape this charge?***

Officer response:

The Council and TfL have a successfully evolving programme on encouraging parents and children out of the school run where it is not necessary; but there are of course many other types of unnecessarily short distance car uses. The prerequisite for short distance driving is that the travelling person has a car in the first instance. It is expected that the emission-based permit charge will help people re-consider non-essential car ownership and use.

In a next phase, currently planned for consultation in 2021, the emission-based parking charges would be extended to destination parking. This will help reduce short distance, high-emission driving to the most parking congested streets.

**1 respondent (<1%) commented:**

***Concern that by being Borough wide the proposals fail to address the particular air pollution problems along and off the London Road running through Norbury & Pollards Hill Ward.***

Officer response:

This scheme is an initial phase & is intended to influence an uptake in lower emission vehicles amongst Croydon residents living within CPZs south of Norbury and commuting by car through London Road in Norbury. The subsequent proposed phase of emission-based destination parking charges and the wider public opinions formed by the proposals are also likely to stimulate an uptake in lower emissions amongst car commuters who do not live within a CPZ. The fact that the average emissions from cars travelling through Norbury is being lowered, would help improve air quality along London Road.

The Council is taking parallel measures to discourage the school run, which also contributes to peak time traffic in London Road, with currently proposed School Street restrictions in Abingdon Road, Norbury, and consideration to identifying other candidate schools in the area.

**4 respondents (<1%) commented:**

***The scheme needs to be combined with tree planting initiatives and creation of space for trees, including specifying mature trees as a planning requirement.***



Officer response:

The Council has a policy on tree planting, although it is not directly linked to emission-based parking charges. The council's active tree planting program aims to plant 650 trees each year & this year alone it is expected to deliver 1200 trees.

**4 respondents (<1%) commented:**

***This will encourage people to concrete over and park in their front gardens which will have environmental impact.***

Officer response:

Restrictions apply to making a pavement cross-overs and hardstandings for parking on private property, and these take into consideration road conditions, dimensions, underground services and surface water effects. The required works to strengthen a foot path and install a pavement cross-over tend to be extensive and, in many cases, may require prior planning consent and the associated cost is significantly higher than a parking permit charge. The Government's Planning Portal states that specific rules apply for householders wanting to pave over their front gardens, such as if the surface to be covered is more than five square metres then planning permission will be needed for laying traditional, impermeable driveways that do not provide for the water to run to a permeable area.

Residents who choose to install pavement cross-overs do so to secure access, not to avoid the permit charge and need to obtain permission from the council to drop the kerb and strengthen the pavement. The emission-based permit charge scheme has potential for helping to reduce the number of cars parked in a road, hence improving access and reducing the incentive for residents to concrete over their front gardens.

**1 respondent (<1%) commented:**

***This will discourage the use of public transport, because people need to drive to the train station and pay to park. Now they will drive to London instead.***

Officer response:

The parking permit charges being consulted are not associated with parking charges at train stations.

**4 respondents (<1%) commented:**

***Cycling infrastructure is inadequate to provide an alternative to the car.***

**1 respondent (<1%) commented:**

***Why not put money into more cycle lanes instead?***

Officer response:

The Council has a cycling strategy and is developing cycling routes. This will be done in addition to encouraging drivers out of the car.

**3 respondents (<1%) commented:**

***Car share infrastructure is inadequate. Why do you not make it easier to park hire cars on an ad-hoc basis.***

Officer response:

The Council's planning and transport plans include requirements and objectives for expanding the car share parking infrastructure, to encourage uptake in local schemes.

**9 respondents (1%) commented:**

***It is unfair to introduce for residents first, while businesses and others can wait until later.***

Officer response:

The first reason for phasing the residential CPZs first is that they represent the most parking congested streets in the borough. The growing amount of car ownership in the borough places particular pressure on residential CPZ. Many respondents to the current consultation raise concern that permits spaces are oversubscribed. High car ownership in the residential CPZs adds to air pollution, through internal traffic and residents circulating in search for a vacant space.

The second reason is that the technology for introducing emissions-based charges to other payment types and locations will need further development time. For the emissions and car reduction to show their required effects by 2021, the recommended emission-based charges cannot be delayed until all other charging modes are developed.

**8 respondents (1%) commented:**

***This is a big burden on local businesses at already difficult times.***

**1 respondent (<1%) commented:**

***I am concerned about levels of traffic and the ability of small and micro businesses to continue in operation.***

**1 respondent (<1%) commented:**

***Parking permits are another tax on business with no legitimate benefit to anyone in Croydon. Taxes based on fake science kills business.***

Officer response:

Business would become negligibly affected (in the range from positive to negative) by the scheme. There are just 285 business permits in use and each presents an opportunity for a permit charge reduction. The later phase of emissions charges proposed for destination parking comes with new Smart Parking technology, which has potential for better guiding drivers to vacant parking bays. This is designed to reduce congestion and air pollution from cars circulating for space; but it also looks

to make the visit easier. The reduced parking difficulties has potential to support traders and businesses in Croydon.

**1 respondent (<1%) commented:**

***Does not address commercial vans parked in residential roads.***

Officer response:

The emission-based parking charges are not intended to address this. The new Parking Policy 2019-2022 has an objective for reviewing and addressing the kerb side share between different road user groups.

**9 respondents (1%) commented:**

***Too much stick, not enough carrot. Oppose the increases for the higher bands; but supports the reductions in lower bands, to help reduce emissions.***

**6 respondents (1%) commented:**

***Residents should have free permit in CPZs, not emission charges.***

**7 respondents (1%) commented:**

***30% increase in band 3 is unreasonable.***

**4 respondents (<1%) commented:**

***Give free permits to residents and instead make the income from pay and display.***

Officer response:

The decision to recommend emission-based charges is taken in context of demands from the community and over-arching national and regional policy. The differential in the charging bands must be sufficient to encourage low emission and to discourage high emission. Narrowing the charging differential, to lessen the permit charge for high-polluting vehicles, would detract from meeting the decision objectives.

The parking of vehicles needs to be managed as the demands for access exceeds available space in certain areas and furthermore aligns with the Council's duty under the Road Traffic Act 2004 to keep the roads open and kerb side accessible, while securing road safety.

The incentive is naturally present in the individual motivation to make choices in the interest of public health and neighbourly fair parking policy – i.e. not claiming any more than a fair share of the available kerbside space.

The deterrent of the cost will remain a relatively modest element of the total cost of car ownership. It has a symbolic effect, already stimulating a public debate about emissions and choices. The debate that the current proposal has spurred is helpful. This is exemplified by a few of the respondents to the consultation declaring that they will now give up one of their cars. One respondent expresses a

thank you to the Council for its decision to encourage the respondent to give up one of the family cars.

**1 respondent (<1%) commented:**

***Why not make a meaningful reduction in pollution by only allocating one parking permit per household?***

**1 respondent (<1%) commented:**

***Don't reduce the surcharge for the third residential permit, In fact, you should increase it.***

Officer response:

The second permit surcharge is increased by 9% to £50 and the third permit has been withdrawn for new applications. Just 27 third permits now exist in the borough. These third permits are already in process of fading away and the higher surcharge is therefore no longer required.

It is already planning policy that new developments in high intensity areas where good alternative transport exists will have more severely restricted access to on-street parking permits.

**1 respondent (<1%) commented:**

***Unfair on single car households. Restrict the number of cars per household outside CPZs instead.***

Officer response:

The CPZ represents a location where residents have reported significant parking congestion and requested that such congestion is managed. Kerb side space is less of a problem outside CPZs. It is not within the Council's authority to restrict cars per household however the current measures are designed to encourage households to self-select their reduction in car ownership.

**1 respondent (<1%) commented:**

***Second permit surcharge for 2 electric cars is a dis-incentive. It charges the second EV as a gas-guzzler.***

Officer response:

The scheme has a two-fold objective, namely to reduce emissions and to reduce the number of cars on the road. An electric vehicle contributes equally to parking congestion in a residential CPZ. Nonetheless, the permit charge for an electric second car would be £56.50, whereas the charge for a gas-guzzling second car would be £350. Where a household essentially need 2 cars, then the incentive remains to make the second car lower emission.

**1 respondent (<1%) commented:**

***I object because we have a number of cars at our home and need to park on the road.***

**1 respondent (<1%) commented:**

***This will price one of our cars off the road.***

Officer response:

The view conflicts with the comments received from many other residents expressing concerns that too many cars are parked in residential streets. The scheme must balance the needs of all road users.

**1 respondent (<1%) commented:**

***Object because it will cause a switch from diesel to petrol. All recent science shows that diesel engines are environmentally friendlier.***

**1 respondent (<1%) commented:**

***Object because the scheme encourages a switch to diesel, due to its lower CO2 emission. Ironically diesel emissions cause more harm.***

Officer response:

The national policy on favouring diesel started to progressively reverse in 2009, when the scrappage scheme was also introduced for older cars. According to the Society of Motor Manufacturers and Traders, the growth in the registrations of new diesel cars levelled off in 2015 and has since been in decline. Diesel currently continue to have a positive role in wider CO2 reduction, in particular for motorway driving where pollution disperses more easily. Older diesel cars, however, contribute disproportionately to NOx in build-up urban areas.

The national Clean Air Strategy 2019 has devolved responsibility for further reducing urban NOx emissions mainly to a local level. The Mayor has introduced ULEZ in Central London and there is a requirement that the outer London boroughs implement local Air Quality Action Plans. NHS data shows that Croydon currently have the highest rate of hospital admissions for childhood (0-9 years) asthma in London. 7.5% of premature deaths in Croydon are linked to air pollution. Failing to address NOx and particulate matter emissions from older diesel (and older petrol) cars in Croydon would deprive many local people of their ability to breathe safe air.

Several manufacturers currently operate diesel scrappage schemes, offering between £2,000 and £6,000 discounts. A national grants scheme for electric vehicles currently covers up to 35% (to max £3,500) of a car's price, or 20% (to max £8,000) for vans. This subsidy opportunity is available to owners of older diesel vehicles.

**2 respondents (<1%) commented:**

***Unfair that my single car in band 4 will increase to £146, while a second gas-guzzling car in band 5 will be £96.***

Officer response:

A second car in band 5 would attract a £350 permit charge.

**1 respondent (<1%) commented:**

***Why not just keep band 3 at the original permit price of £80 and slowly phase it up to £104.***

Officer response:

Many respondents to this consultation have expressed concern over the lack of availability of parking spaces, which would indicate that current levels of parking control measures are not achieving their objectives for managing access. The £80 permit charges set in 2013 are currently too low to influence car ownership and to encourage a switch to lower emission cars.

The national Clean Air Strategy 2019 and the London Mayor's Strategy require further actions to reduce urban NOx emissions mainly to a local level. These actions are required to start showing measurable results by 2021. Public Health (NHS) data shows that Croydon currently have the highest rate of hospital admissions for childhood (0-9 years) asthma in London and 7.5% of premature deaths in Croydon are linked to air pollution. Phasing in the charges more slowly would fail to address NOx and particulate matter emissions in a timely manner would deprive many local people of their fundamental right to safe air.

**1 respondent (<1%) commented:**

***If a 2009 model of a vehicle is in the same band as a cleaner 2019 model of the same vehicle then the scheme is flawed. There is no incentive to upgrade to a cleaner car.***

Officer response:

The proposal has sought to strike a balance in the proposal - too many charging bands and the incentive to change is less; too few and the steps between bands can be more dramatic. The increase from £80 to £104 in the middle band 3, where most cars resides, should encourage owners to consider a model that falls into a lower emission when next choosing a car.

**1 respondent (<1%) commented:**

***Objects because when buying a black cab 4 years ago the emission was determined by requirement to comply with TfL hire license terms.***

Officer response:

The vehicle is presumably registered around the time of September 2015 and will be charged as other vehicles with similar emission levels from this time.

**2 respondents (<1%) commented:**

***The charges per band do not increase linearly and too polarised.***

Officer response:

They are designed to be non-linear, to help enhance the perception of the differential and more effectively influence car ownership choices.

**1 respondent (<1%) commented:**

***The £50 charge is in not proportionate to the £300 upper CO2 band. Because diesel vehicles tend to have significantly lower CO2 emissions than many petrol vehicles, the likely effect is that people driving around older, dirtier diesels could pay significantly less than those driving newer petrol vehicles. This make no sense from an air quality perspective.***

Officer response:

The £50 diesel surcharge applies to pre-September 2015 vehicles only. This date reflects the introduction of a lower NOx emission standard. Although diesel prior to this date may emit less CO2, their NOx emission is not verifiably recorded to the latest low emission standard. Whereas NOx is harmful to local public health, the CO2 greenhouse gas has low direct impact on public health.

**8 respondents (1%) commented:**

***Charges should be based on MOT certificate emission test measurement, not by the vehicle age.***

Officer response:

The MOT emissions test measurements can vary according to environmental conditions and how busy the test centre is – i.e. how long it allows for the engine to 'run in'. Vehicles with emissions in the boundary between 2 charge bands could easily obtain different test results year on year. Also, identical car models may obtain different results at different test centres. Such a system would be open to an annual anxiety and potential disputes – some fairly and some unfairly. The DVLA emission record, although not a reflection of an individual vehicles state of repair, is a constant and is made under more controlled conditions.

**4 respondents (<1%) commented:**

***Unfair to penalise people with cleaner Euro6 diesel engines. How do you differentiate?***

Officer response:

Vehicles registered from September 2015 when the Euro6 standard was formally introduced are exempt from the diesel surcharge. The vehicle's registration document from the DVLA states the date of registration. These vehicles are not differentiated from other vehicles.

**1 respondent (<1%) commented:**

***Petrol cars must also be in the scheme, they pollute the air just the same. Why are they not included?***

Officer response:  
Petrol cars are in the scheme.

**1 respondent (<1%) commented:**

***The scheme should be extended to charge for car length, where longer cars pay more.***

Officer response:

This would be a practically difficult measure. Although the length of a vehicle may relate to parking congestion, it does not universally correlate to air quality.

**7 respondents (1%) commented:**

***Vehicles that make repeat and multiple stop journeys such as busses, taxis, commercial vans and construction traffic cause pollution, not parked cars.***

**5 respondents (<1%) commented:**

***Take dirty diesel busses off the road instead.***

**4 respondents (<1%) commented:**

***Charge diesel cars only.***

**5 respondents (<1%) commented:**

***Emissions reduction should target those who can afford it such as big business replacing cars frequently.***

**2 respondents (<1%) commented:**

***Significantly increase business permit charges instead of increasing resident permits.***

**2 respondents (<1%) commented:**

***Consider other ways to improve air quality such as review transport links, smart traffic lights, reduce speed humps and reduce one-way systems.***

**1 respondent (<1%) commented:**

***Start instead with the biggest polluters not as it appears with the largest pool of payees. Look to the endless building sites with their deliveries, diesel generators, transient work forces. How is their carbon foot print offset? Do they bear any share of the load or are they as investors 'too important'?***

**1 respondent (<1%) commented:**

***Alter the flow of traffic away from the most vulnerable instead.***



**5 respondents (<1%) commented:**

***In fairness, charge motorcycles, mopeds and cyclists as well.***

Officer response:

Becoming a greener borough will not be achieved by any one action. The proposal to introduce emission-based parking charges would form one part of a range of actions that are required at a community, borough, London and national level.

The per-person congestion and emission from a diesel bus passenger is already less than the per person effects from a car driver. Transport for London have a programme for converting busses to electrics by 2030 for further improvements.

**5 respondents (<1%) commented:**

***Charge or regulate the car manufacturers instead, for selling polluting cars.***

**2 respondents (<1%) commented:**

***Responsibility should be taken by government and the energy companies to tackle climate change, investing in natural energy (wind/tidal) and closing air polluting coal based per stations.***

**1 respondent (<1%) commented:**

***Unfair to be penalised for car brands not being up to scratch with their CO2 emissions.***

Officer response:

The suggestion is outside the Council's authority. The Council supports the London Mayor in lobbying for national measures.

**1 respondent (<1%) commented:**

***The Council has created the emission problem because 20mph zones cause congestion and run engines colder, less efficient.***

Officer response:

Driving at 20mph is more fuel efficient than driving at 30mph, both in terms of air/road friction and engine temperature.

**1 respondent (<1%) commented:**

***This will force the export of dirty cars to unregulated countries, exacerbating the global problem. Needs a global, not local solution.***

**1 respondent (<1%) commented:**

***This will cause sell-off of cars people cannot afford to keep, flooding the market and depressing their sales values.***

Officer response:

The Council supports the London Mayor's call for a national scrappage scheme to be funded by central government.

**8 respondents (1%) commented:**

***New replacement vehicles and batteries manufacturing will cause pollution.***

**2 respondents (<1%) commented:**

***This will cause consumerism. The manufacturing of replacement cars cause pollution.***

Officer response:

The purpose of introducing the emissions based parking permit charges and diesel surcharges is to address the issue of air pollution by putting in place measures that will help to achieve better air quality and improve public health in Croydon. National policies are in place to regulate recycling and manufacturing resources use.

**2 respondents (<1%) commented:**

***I rarely drive, but mostly use public transport instead. The new charges will cause me to drive more.***

Officer response:

The comment reflects a minority view. The scheme could present an opportunity to replace the car with alternatives, such as car pool.

**1 respondent (<1%) commented:**

***With the prevailing S/W wind at 7m/sec the air in Croydon is completely replaced on average every 29 minutes. This is why the Air Quality Action Plan 2017-22 is totally flawed.***

**1 respondent (<1%) commented:**

***Those in the community who are concerned about air quality do not represent the majority of residents and they were deceived by the question not asked.***

**1 respondent (<1%) commented:**

***This affects a larger demographic and will not assist residents.***

**1 respondent (<1%) commented:**

***There is currently no evidence that air pollution causes asthma; although it is likely to be a 'trigger' and can worsen symptoms.***

Officer response:

Air pollution does not immediately disperse. The comments do not accord with NHS public health data, which report links between air pollution and childhood asthma admissions and premature death. Asthma related exacerbation, triggered by air pollution, can be a cause of death.

**1 respondent (<1%) commented:**

***Every car driving on a given stretch of road at a given moment contributes equally to congestion, irrespective of its CO2 emissions. Follow that local residents should foot higher residential parking permits when there is no necessary link between the fact of their car ownership and local congestion.***

Officer response:

The introduction of Emission-Based Parking Permit Charges and Diesel surcharges for Permits, are intended to encourage motorists to consider more active and sustainable forms of transport, or to switch to zero or low emission vehicles instead. Such behaviour change would reduce the overall demand pressure as well as help to drive improvements in our public health and air quality objectives.

**6 respondents (1%) commented:**

***Object because was never asked when prior survey on air pollution and traffic congestion was conducted. Residents didn't agree to reductions.***

**2 respondents (<1%) commented:**

***The council have not carried out proper consultations and do not have a mandate for this.***

**1 respondent (<1%) commented:**

***There must have been a study on expected revenue, but it has not been made public.***

**1 respondent (<1%) commented:**

***It's a survey so I'm expecting questions so you know my views.***

**1 respondent (<1%) commented:**

***I feel more discussion is needed before a decision is made.***

Officer response:

The current consultation follows the statutory procedure under the Road Traffic Regulations Act 1984, for inviting and responding to objections to a draft Traffic Management Order. Respondents are able to express their views. More than 100 unique views were received in this consultation.

More open-ended questions, and multiple options with scoring scales, were asked in the prior engagements on air quality in July 2017, on the transportation strategy implementation plan in September 2018 and on the parking policy on emission-based charges in April 2019. These prior engagements have helped define the proposal subject to the current consultation asking for comments and objections.

The revenue and capital consequences together with risks were reported to a Cabinet meeting on 25 March and the report is available as a public record (<https://democracy.croydon.gov.uk/documents/s14463/Parking%20Policy%20report.pdf>). This report provides a 3-year medium term revenue and capital forecast of effect from all permit charges.

**3 respondents (<1%) commented:**

***This will devalue houses and could hinder house sales.***

Officer response:

House values are affected by a number of variables, including accessibility and the local environment. The emission-based charges are intended to help improve access and the local environment.

**5 respondents (<1%) commented:**

***It is not the council business to try modify lifestyle and free choice.***

**1 respondent (<1%) commented:**

***In a free country parking permits should be easier to obtain and cheaper.***

Officer response:

The purpose of introducing the emissions based parking permit charges and diesel surcharges is to address the issue of air pollution by putting in place measures that will help to achieve better air quality and improve public health in Croydon by encouraging motorists to consider more active and sustainable forms of transport, or to switch to zero or low emission vehicles instead.

The Council has a duty under the Road Traffic Act 2004 to keep the roads open and kerb side accessible, while securing road safety.

**1 respondent (<1%) commented:**

***I want to understand what you plan to spend the additional tax revenue on? Surely on improving air quality and green space.***

**1 respondent (<1%) commented:**

***How can you legally charge me £300 to park in my road?***

**1 respondent (<1%) commented:**

***The scheme should only be allowed to recoup the cost of implementation. Introducing the charges is an unlawful use of power.***

Officer response:

The Council has a duty under the Road Traffic Act 2004 to secure an effective and efficient road network. Local authorities have powers under the Road Traffic Regulations Act 1984 to use parking charges as a means to manage the parking and traffic objectives, including air quality, which is has the duty to secure.

Any surplus from parking charges are ring-fenced to the purposes set out in section 55 of the RTRA and, for example, contributes significantly to sustaining public transport fare concessions such as the Freedom Pass.

**1 respondent (<1%) commented:**

***I question the legality of using DVLA data to determine the short-term rent on land (vehicle bay).***

Officer response:

The parking charge is not a rental fee. It is a charge introduced to manage the use of public highway or land and it implemented in accordance with powers under the Road Traffic Regulations Act 1984. Vehicle model CO2 emission data is public information. The Council will require the permit holder to verifiably provide a vehicle's CO2 emission figure, from the DVLA issued registration document, before being able to issue an emission-based permit.

**1 respondent (<1%) commented:**

***I object because this proposes to charge people for parking in their own driveways.***

Officer response:

The scheme is concerned with parking permits for on-street parking within controlled zones. It will not charge car owners for parking on their own driveways. However, there is no automatic right to park on any part of the street or pavement, which constitutes the public Highway.

**8 respondents (1%) commented:**

***Proposed large Westfield car park will cause pollution. Policy is inconsistent.***

Officer response:

The Council does not consider the emission-based parking proposal to be in conflict with developing Croydon's commercial centre.

**9 respondents (1%) commented:**

***I have a parking permit and have not received direct notification about this consultation.***

**5 respondents (<1%) commented:**

***None of the current permit holders were written to.***

**3 respondents (<1%) commented:**

***Letters were not sent to every household about the proposed charges, not every resident was given a chance to voice an opinion.***

Officer response:

The statutory requirement for consulting on an amendment to a Traffic Management Order is to advertise a Public Notice in local press, which the Council did on 23 May 2019 as detailed in paragraph 3.3.1. It further advertised the consultation in Your Croydon and extensively on social media. The Council emailed 13,738 past and present permit holders who have provided their address for such communication and wrote letters to the 310 for whom an email address is not held. The recipients immediately started to respond to the online survey. The Council considers that residents affected by the proposals were effectively reached.

**2 respondents (<1%) commented:**

***Survey is limited to 800 characters, I have more to say.***

Officer response:

The consultation was not limited to online submissions alone. The Public Notice that was provided on the survey site included the email and postal addresses for making unlimited length comments. Experience, which was validated following the first 582 submissions, shows that 50% of respondents made their comments in less than 300 characters and 80% in less than 500 characters. Of 1,146 responses received, 1,133 were submitted online. 13 respondents that had more to say submitted their responses by email or letter. The longest response accepted was 69,600 characters.

**2 respondents (<1%) commented:**

***My child will become a victim of knife crime on public transport in Croydon if you discourage me from driving them.***

Officer response:

Compared to other London boroughs, violence, particularly youth violence and weapon enabled violence in Croydon has been falling at a greater rate in 2018/19 compared to the London average. The borough's new Violence Reduction Network will build on this success, adopting what is known as a 'public health' approach to tackling crime. This means local agencies such as the council, police, health

services, and voluntary and community groups, working together to tackle the root causes of crime, addressing issues such as poverty, education, health and housing.

The Council is also serious about child road safety. Children in cars can also be harmed in driving incidents and from air pollution.

**2 respondents (<1%) commented:**

***Charges will have an unacceptable impact on blue badge holders.***

**1 respondent (<1%) commented:**

***Charity permit is not currently vehicle specific. Charities are now forced to purchase the highest band to cover all eventualities.***

Officer response:

The Blue Badge, its companion badge and non-vehicle specific charity badges for volunteers who visit vulnerable residents are exempt from parking charges under the proposed Traffic Management Order in the same manner which they historically were. This will not change under current proposals.

**2 respondents (<1%) commented:**

***Will Council and NHS vehicles get taxed as well?***

Officer response:

The permits established for public services, healthcare professionals and community care charities permit parking in all zones. They can tend to involve extensive car travel across the borough and it is important to still encourage the relevant organisations to choose lower emission vehicles. The Council and NHS service functions are therefore also charged according to emission levels as other permit holders.

**1 respondent (<1%) commented:**

***I need to drive in my job to provide essential healthcare to children with asthma. Unfair that I have to pay for my parking.***

Officer response:

If the essential role is performed in a professional capacity, then it would be reasonable to expect the employer to pay the Community Care permit. If the essential role is performed in a voluntary capacity, then a substantially discounted charity permit is, subject to application and qualification for such a permit, available.

**1 respondent (<1%) commented:**

***This will disproportionately hit the poorer North of the borough.***

Officer response:

Permits apply where residents have requested controlled parking, due to parking congestion. Although the concentration of traffic tends to be higher in the North of the borough, CPZs are in fact distributed throughout the borough.

**2 respondents (<1%) commented:**

***This will discourage visitors to residents.***

Officer response:

The visitor permit scheme would operate as previously, but applying a -90% reduction on lowest emission vehicles and a +30% increase for the top band vehicles. This differential is less than for other permit types. The charge is calculated automatically when keying the visitor's vehicle registration number into the mobile permit app.

**1 respondent (1%) commented:**

***CPZs should be significantly expanded.***

Officer response:

The emission-based charges are not concerned with expanding the CPZs. The Council generally introduce a CPZ where residents have requested it in response to concerns regarding parking issues.

**1 respondent (<1%) commented:**

***You are the only borough as far as I know who charges for parking 24/7, not even in central London.***

Officer response:

The purpose of introducing the emissions based parking permit charges and diesel surcharges is to address the issue of air pollution by putting in place measures that will help to achieve better air quality and improve public health in Croydon by encouraging motorists to consider more active and sustainable forms of transport, or to switch to zero or low emission vehicles instead.

The majority of charged parking in the Borough is in on-street parking bays which are mainly shared between permit holders and Pay & Display / Pay by Phone users. This maximises flexibility for drivers ensuring that there are opportunities for visitors and customers to local businesses whilst giving priority to resident permit holders. Charges are a necessity in meeting supply and demand.

The introduction of emissions based parking charges for on-street bays and public car parks is still being developed and when proposals are at an appropriate stage they will be open for public consultation.

**1 respondent (<1%) commented:**

***There isn't enough parking on the council estate and you have not made it clear what the new charges will be for council estates.***



Officer response:

Parking places in private and public housing estates are not subject to the Traffic Management Order being consulted on. Parking on housing estates is normally managed by the landlord.

**1 respondent (<1%) commented:**

***Collect emission-charges from council tax instead.***

Officer response:

The idea could have merit, but is too complicated for a timely solution. There would need to be a way to affirmatively tie a vehicle to an address.

- 3.3.5 The statutory consultation is primarily concerned with inviting opposing comments and objections. Parking permit holders and the wider public were notified extensively about the consultation. It must be considered that although the scheme will impact on 10,636 parking permit holders, only 1,039 have expressed objections or concerns. The other roughly 90% of permit holders are by default mostly indifferent, unconcerned, in agreement or otherwise unperturbed by the scheme.
- 3.3.6 Of those respondents opposing the increase in parking charges, many have simultaneously acknowledged that air pollution and parking congestion should be addressed. Only a comparatively small number of respondents say that air pollution and parking congestion is not a problem and does not need addressing. This agrees with findings from past engagements, in which a majority of Croydon residents recognise a need to address air pollution and the number of cars on the road.
- 3.3.7 In light of the comments and objections received and the matters detailed within this report, it is considered that the reasons for introducing emissions-based parking charges outweighs the reasons for not implementing them.
- 3.3.8 In conclusion, the consultation has not identified sufficient or material objections that would invalidate the objectives for introducing emission-based parking charges.
- 3.3.9 Subject to the Executive Director, Place agreeing to the recommendations in this report, each of the objectors will receive one or more responses based on the officer comments in Table 1 or 2, to address the total subject matter in the individual objection.

### **3.4 IMPLEMENTATION**

- 3.4.1 Subject to the Executive Director Place agreeing to the recommendations in this report, Parking Services will work with their software supplier to upgrade the online permit application, review, printing and issuing processes. This work has commenced, with the detailed specification for the works already completed. The commitment to the expenditure with the software developer can only be committed to following a decision to proceed.

It is considered feasible to have the new resident permit module ready for testing and work processes development by 1 September 2019. This presents a tight but

achievable turnaround in debugging and training staff in the revised processes in readiness for 1 October 2019.

#### 4 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

Implementing the recommendations of this report will commit the Council to £38k Capital expenditure over the next two years for the purchase of equipment and approximately £110k revenue expenditure each year to fund three new employee posts to deliver the service. The capital expenditure will be funded via a bid to Growth Board, the revenue expenditure will be wholly funded from the revenue generated from the emission-based permit sales.

##### 1 Revenue and Capital consequences of report recommendations

	Current year	Medium Term Financial Strategy – 3 year forecast		
	2019/20	2020/21	2021/22	2022/23
	£'000	£'000	£'000	£'000
<b>Revenue Budget available</b>				
Expenditure	0	0	0	0
Income	0	0	0	0
<b>Effect of decision from report</b>				
Expenditure	54	110	112	114
Income	(65)	(185)	(274)	(247)
<b>Remaining budget</b>	<u>(11)</u>	<u>(75)</u>	<u>(162)</u>	<u>(133)</u>
<b>Capital Budget available</b>				
Expenditure	0	0	0	0
<b>Effect of decision from report</b>				
Expenditure	28	10	0	0
<b>Remaining budget</b>	<u>28</u>	<u>10</u>	<u>0</u>	<u>0</u>

##### 2 The effect of the decision

The emission-based charges will be introduced in phases, anticipated to commence in October 2019. The new charges are applied at the time of renewal only – i.e. will have half effect over the first 12 months following introduction. The year 2019-2020 income effect from emission-based charges will be about £65k. The year 2020/21 considers the continued renewals of resident permits and introduction of other permit types and diesel surcharges, again on a gradually ramping renewal basis.

The following table details the revenue forecast by the different categories of parking charges. The table should be read in context of the number of permits issued in each category (see section 3.1.8).

	2019/20	2020/21	2021/22	2022/23
Resident permits	(65)	(120)	(124)	(113)
Visitor permits (days)	0	0	0	0
Business permits	0	(2)	(4)	(3)
Other permits	0	(41)	(91)	(82)
Diesel surcharge	0	(23)	(54)	(48)

The costs of implementing the new charging structure will become operationally self-financing.

The emission-based charges for on-street and off-street parking places remains to be developed and consulted on at a later date.

### **3 Risks**

As permit holders switch cars to lower emission bands it will affect a reduction in revenue generated. The discounting for lower emission bands is non-linear, meaning that a, say, 5% switch into the lowest band will have greater than 5% revenue reduction effect. The forecasted reduction in revenue between 2021/22 and 2022/23 reflects a set of assumptions about changes in car ownership behaviour. The changes in car ownership will be gradual and it is presently impossible to reliably forecast the effects. The change can however be assumed to be gradual over multiple years, as opposed to sudden and immediately significant. This affords for timely adjustments to the policy and charges be made, if and when necessary.

### **4 Options**

The required capital expenditure of £28k in 2019/20 and £10k in 2020/21 will be funded via a bid to Capital Growth.

### **5 Future savings/efficiencies**

The later phases of emission-based charges include the development of new approaches and the adoption of new technologies, which are expected to be less resource demanding, more efficient approach to parking management.

### **6 *Approved by, Kate Bingham, Head of Finance on behalf of the Director of Finance, Investment and Risk and S151 Officer.***

## **5 LEGAL CONSIDERATIONS**

**5.1** The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that Sections 6, 45, 46, 47, 49, 124 and Part IV of Schedule 9 of the Road Traffic Regulation Act 1984 (RTRA) provides the Council with the power to implement the changes proposed in this report. This legislation gives a local authority the power to make Traffic Management Orders (TMO) to control parking by designating on-street parking places, charging for their use and imposing waiting and loading restrictions on vehicles of all or certain classes at all times or otherwise.

**5.2** In making such Orders, the Council must follow the procedures set out at Schedule 9, Part III of the Road Traffic Regulation Act 1984 and detailed in the Local

Authorities Traffic Orders (Procedure)(England and Wales) Regulations 1996 (the 1996 Regulations). The said Regulations, prescribe inter alia, specific publication, consultation and notification requirements that must be strictly observed. It is incumbent on the Council to take account of any representations made during the consultation stage and any material objections received to the making of the Order, must be reported back to the decision maker before the Order is made.

- 5.3** By virtue of section 122 of the RTRA, the Council must exercise its powers under that Act so as 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. These powers must be exercised so far as practicable having regard to the following matters:-
- the desirability of securing and maintaining reasonable access to premises.
  - the effect on the amenities of any locality affected including the regulation and restriction of heavy commercial traffic so as to preserve or improve amenity.
  - the national air quality strategy.
  - 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.
  - any other matters appearing to the Council to be relevant.
- 5.4** The High Court has confirmed that the Council must have proper regard to the matters set out at s 122(1) and (2) and specifically document its analysis of all relevant section 122 considerations when reaching any decision.
- 5.5** Finally it should be noted that the Courts have been clear that the Road Traffic Regulation Act 1984 is not a fiscal measure and does not authorise a local authority to use its powers to charge local residents for parking in order to raise surplus revenue for other transport purposes.
- 5.6** When designating and charging for parking places the authority should be governed solely by the section 122 purpose. There is in section 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 section 122 (broadly referred to 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 section 55(4) revenue.

*(Approved by, Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Law and Governance & Deputy Monitoring Officer)*

## **6 HUMAN RESOURCES IMPACT**

- 6.1** The changes and perceived complexity with the emission-based charges will increase the number of enquiries and processes involved in the issuance of parking permits. A review of the activity index calculates that 3 additional FTE posts will be required initially, to enable the introduction of emission-based permits. This number can be reduced over 12 to 18 months, as the transitions from the old to the new charging structure has settled and the self-service portal has been fully upgraded.

The posts must be in place at least 1 month in advance of the new charging structure commencing, while capacity for completing prior induction and training exists.

- 6.2** There will be an HR impact in terms of recruitment and this will be managed under the Council's policies and procedures.

*Approved by: Jennifer Sankar, Head of HR Place & GSE on behalf of Sue Moorman, Director of HR*

## **7 EQUALITIES IMPACT**

- 7.1** An overarching Equality Analysis (EA) has been undertaken in respect of the Parking Policy and its associated action plan which includes a specific objective to introduce emission based parking charges, and this EA has subsequently been reviewed in response to the consultation. The EA identified a potential negative impact on the people living with a disability who showed some elevated level of concern for parking charges and some concern about insufficiency in the parking bays accessible for the disabled. To note, disabled Blue badges and disabled companion badges are both exempt from these proposed charges. In Croydon there are 11,459 individual and 71 organisational blue badges. To mitigate the impact, the EA concludes that the council will adopt either the Disabled Parking Accreditation or London Plan, whichever is the highest standard for the provision of disabled parking bays various locations. The Parking Policy and its associated action plan also has objectives to deliver School Streets, which will afford eligibility of carers and relatives to drive during the restricted hours, to visit the vulnerable. The proposed change will improve air quality & public health for all residents and visitors by implementing parking related measures.

*Approved by: Yvonne Okiyo, Equalities Officer*

## **8 ENVIRONMENTAL IMPACT**

- 8.1** The emission-based parking charges are designed to contribute to the Air Quality Actions Plan.

## **9 CRIME AND DISORDER REDUCTION IMPACT**

- 9.1** There are no foreseeable impacts on this.

## **10 REASONS FOR RECOMMENDATIONS/PROPOSED DECISION**

- 10.1** There are currently insufficient borough level measures and tools in place to address specific areas of localised matters in air quality, to support active travel, to reduce external traffic and to accommodate planned and future Growth Zone and suburban intensification.
- 10.2** Although the proposed charges will impact on 10,636 parking permit holders, only 1,039 have expressed objections or concerns during the consultation period. The other roughly 90% of permit holders are by default mostly indifferent, unconcerned, in agreement or otherwise unperturbed by the scheme.

- 10.3** In light of the comments and objections received during the consultation period and the matters detailed within this report, it is considered that the reasons for introducing emissions-based parking charges outweighs the reasons for not implementing them.
- 10.4** It is the recommendation of officers that emission-based parking permit charges and diesel surcharges for permits (as detailed in Appendix 1) be introduced as a measure to help address air pollution.
- 10.5** The statutory procedure is to respond to objections to inform the objectors of the above decision and reasons.

## **11 OPTIONS CONSIDERED AND REJECTED**

- 11.1** The alternative option of not implementing emission-based parking charges would result in the Council failing to meet its obligations under nationally and regionally devolved responsibilities to improve the borough's air quality and public health objectives. Nor would we be able to achieve the Council's obligations under the Mayor's Transport Strategy to reduce car dependency and other objectives such as reduced traffic.
- 11.2** An option could be to wait and see if national and regional drivers alone are enough to make a difference in improving air quality for Croydon but realistically this would take far longer to achieve any significant improvements and in light of an estimated 205 deaths a year in Croydon that are attributable to air pollution, this is not a viable option.

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### **CONTACT OFFICER:**

- Steve Iles, Director of Public Realm;
- Anupa Patel, Head of Strategic Projects;
- Sarah Randall, Head of Parking Services.

### **APPENDICES TO THIS REPORT**

- Appendix 1 – Proposed emission-based parking permit charges and diesel surcharges for permits for approval.
- Appendix 2 – Public Notice, displaying the emission-based parking charges structure.

### **BACKGROUND PAPERS:**

- Equalities Analysis for Parking Policy (July 2019).
- Total responses to the Emission Based Parking Charges consultation
- ED Place Key Decision report Parking Policy  
(<https://www.croydon.gov.uk/sites/default/files/0419PL-Parking-Policy-KeyDecisionNotice.pdf>)

## APPENDIX 1

### Residents parking permits (annual, 12 months) – From October 2019

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£6.50	£80
	Band 2	1 – 75	£65	
	Band 3	76 – 165	£104	
	Band 4	166 – 225	£146	
	Band 5	>225	£300	
Before March 2001	n/a	n/a	£300	
Surcharge for a second permit at the same address, whatever the charging band.			£50	£46
Surcharge for a third permit at the same address, whatever the charging band. [note*]			£150	£225

\* Implemented on a renewal basis. First time permit admin fee applies. The third residents permit is no longer available for new permit applications. The third permit is available on a renewal basis only.

### Business parking permits (annual, 12 months) – From April 2020

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£50	£382
	Band 2	1 – 75	£100	
	Band 3	76 – 165	£400	
	Band 4	166 – 225	£500	
	Band 5	>225	£750	
Before March 2001	n/a	n/a	£750	
Surcharge for a second permit at the same address, whatever the charging band.			£50	Nil
Surcharge for a third permit at the same address, whatever the charging band. [note*]			£150	£178
Surcharge for a fourth permit at the same address, whatever the charging band. [note*]			£500	£528

\* Implemented on renewal basis. First time permit admin fee applies. The third and fourth business permits are not available at addresses within the Croydon Central CPZ (i.e. the North, N1, South, East Outer, East Inner, E2 and West permit zones).

### Business parking permits (quarterly, 3 months) – From April 2020

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£16	£123
	Band 2	1 – 75	£32	
	Band 3	76 – 165	£130	
	Band 4	166 – 225	£160	
	Band 5	>225	£240	
Before March 2001	n/a	n/a	£240	
Surcharge for a second permit at the same address, whatever the charging band.			£16	Nil
Surcharge for a third permit at the same address, whatever the charging band. [note*]			£48	Nil
Surcharge for a fourth permit at the same address, whatever the charging band. [note*]			£160	Nil

\* Implemented on renewal basis. First time permit admin fee applies. The third and fourth business permits are not available at addresses within the Croydon Central CPZ (i.e. the North, N1, South, East Outer, East Inner, E2 and West permit zones).

### Diesel surcharge on parking permits – From April 2020

Date diesel vehicle registered	Proposed new surcharge (1/2 day)	Proposed new surcharge (3 months)	Proposed new surcharge (6 months)	Proposed new surcharge (12 months)	Pre-existing charge
From September 2015	Nil	Nil	Nil	Nil	Nil
Before September 2015	£0.50	£16	£30	£50	Nil

\* The diesel surcharge is applied to any permit type, new application or renewal, whatever the charging band and in addition to any other surcharges already being applied.

### Resident's visitor permit (half day) for inner zones (i.e. the North, N1, South, East Outer, East Inner, E2 and West permit zones) – From April 2020

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£0.30	£2.00
	Band 2	1 – 185	£2.00	
	Band 3	>185	£3.00	
Before March 2001	n/a	n/a	£3.00	

\* Diesel surcharge also applies.



**Resident's visitor permit, (half day) for outer zones** (i.e. all permit zones within Croydon not listed above) – **From April 2020**

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£0.20	£1.30
	Band 2	1 – 185	£1.30	
	Band 3	>185	£1.90	
Before March 2001	n/a	n/a	£1.90	

\* Diesel surcharge also applies.

**All Zones on and off-street parking permit (annual, 12 months) – From April 2020**

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£100	£980
	Band 2	1 – 75	£300	
	Band 3	76 – 165	£1,000	
	Band 4	166 – 225	£1,300	
	Band 5	>225	£1,600	
Before March 2001	n/a	n/a	£1,600	

\* Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies. **This permit replaces the All-Zones on-street annual permit, which is being withdrawn.**

**All Zones on and off-street parking permit (half year, 6 months) – From April 2020**

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£60	£500
	Band 2	1 – 75	£180	
	Band 3	76 – 165	£600	
	Band 4	166 – 225	£780	
	Band 5	>225	£960	
Before March 2001	n/a	n/a	£960	

\* Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies. **This permit replaces the All-Zones on-street six month permit, which is being withdrawn.**

**Doctor's bay parking permit, initial (annual, 12 months) – From April 2020**

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£60	£400
	Band 2	1 – 75	£180	
	Band 3	76 – 165	£600	
	Band 4	166 – 225	£780	
	Band 5	>225	£960	
Before March 2001	n/a	n/a	£960	

\* Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies.

**Doctor's bay parking permit, subsequent (annual, 12 months) – From April 2020**

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£6	£40
	Band 2	1 – 75	£18	
	Band 3	76 – 165	£60	
	Band 4	166 – 225	£78	
	Band 5	>225	£96	
Before March 2001	n/a	n/a	£96	

\* Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies.

**Community Care parking permit (half year, 6 months) – From April 2020**

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£30	Nil*
	Band 2	1 – 75	£90	
	Band 3	76 – 165	£300	
	Band 4	166 – 225	£390	
	Band 5	>225	£480	
Before March 2001	n/a	n/a	£480	

\* This new permit replaces the Neighbourhood Care (NHS) and Council (Social Care etc.) Permits. Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies.

### Statutory Undertaker parking permit (annual, 12 months) – From April 2020

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£60	£480
	Band 2	1 – 75	£180	
	Band 3	76 – 165	£600	
	Band 4	166 – 225	£780	
	Band 5	>225	£960	
Before March 2001	n/a	n/a	£960	

\* Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies.

### Charity parking permit (annual, 12 months) – From April 2020

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£10	£80
	Band 2	1 – 75	£25	
	Band 3	76 – 165	£85	
	Band 4	166 – 225	£105	
	Band 5	>225	£160	
Before March 2001	n/a	n/a	£160	

\* Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies.

# PUBLIC NOTICE

## CROYDON COUNCIL

### PROPOSED CHANGES TO THE STRUCTURE OF CHARGES FOR PARKING PERMITS IN CONTROLLED PARKING PERMIT ZONES

#### The Croydon (Parking Places) (Further Provisions) (No. K16) Order 2019

1. NOTICE IS HEREBY GIVEN that Croydon Council propose to make the above Traffic Order under the relevant sections of the Road Traffic Regulation Act 1984, as amended by the Traffic Management Act 2004 and all other enabling powers.
2. **The general effect of the Order would be:-**
  - a) to introduce emissions based charges for all parking permits and a diesel surcharge, as detailed in the Schedule to this notice, which would apply throughout all Controlled Parking permit zones within the London Borough of Croydon.
  - b) to amend existing Traffic Management Orders to include the new charges.
3. Copies of the proposed Order, of all related Orders and of the Council's statement of reasons for proposing to make the Order, can be inspected from 9am to 4pm on Mondays to Fridays inclusive until the last day of a period of six weeks beginning with the date on which the Orders were made or, as the case may be, the Council decides not to make the Orders, at the Enquiry Counter, 'Access Croydon' Facility, Bernard Weatherill House, 8 Mint Walk, Croydon, CR0 1EA.
4. Further information may be obtained by telephoning Parking Services, Place Department, telephone number: 020 8726 7100.
5. Persons desiring to object to the proposed Order should make a statement in writing of their objection and the grounds thereof on the "Have your say" page at [www.croydon.gov.uk](http://www.croydon.gov.uk). Alternatively write to the Parking Design Section, Place Department, 6th Floor, Zone C, Bernard Weatherill House, 8 Mint Walk, Croydon, CR0 1EA or email [Parking.Design@croydon.gov.uk](mailto:Parking.Design@croydon.gov.uk) quoting the reference PD/CH/K16 by 20 June 2019.
6. The Order is intended to introduce emissions based parking permit charges and a diesel surcharge. The changes are intended to encourage motorists to consider more active and sustainable forms of transport, or to switch to zero or low emission vehicles, helping to drive improvements in our public health and air quality objectives and achieve a cleaner and more sustainable environment.

Dated this 23 May 2019

Mike Barton,

Highway Improvements Manager,

Place Department

### Residents parking permits (annual, 12 months) – From October 2019

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Before March 2001	n/a	n/a	£300	
Surcharge for a second permit at the same address, whatever the charging band.			£50	£46
Surcharge for a third permit at the same address, whatever the charging band. [note*]			£150	£225

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From September 2015	Nil	Nil	Nil	Nil	Nil
Before September 2015	£0.50	£16	£30	£50	Nil

- \* The diesel surcharge is applied to any permit type, new application or renewal, whatever the charging band and in addition to any other surcharges already being applied.

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Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
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Before March 2001	n/a	n/a	£1.90	

\* Diesel surcharge also applies.

**All Zones on and off-street parking permit (annual, 12 months) – From April 2020**

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	Band 5	>225	£1,600	
Before March 2001	n/a	n/a	£1,600	

\* Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies. **This permit replaces the All-Zones on-street annual permit, which is being withdrawn.**

**All Zones on and off-street parking permit (half year, 6 months) – From April 2020**

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£60	£500
	Band 2	1 – 75	£180	
	Band 3	76 – 165	£600	
	Band 4	166 – 225	£780	
	Band 5	>225	£960	
Before March 2001	n/a	n/a	£960	

\* Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies. **This permit replaces the All-Zones on-street six month permit, which is being withdrawn.**

**Doctor's bay parking permit, initial (annual, 12 months) – From April 2020**

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£60	£400
	Band 2	1 – 75	£180	
	Band 3	76 – 165	£600	
	Band 4	166 – 225	£780	
	Band 5	>225	£960	
Before March 2001	n/a	n/a	£960	

\* Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies.



**Doctor's bay parking permit, subsequent (annual, 12 months) – From April 2020**

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£6	£40
	Band 2	1 – 75	£18	
	Band 3	76 – 165	£60	
	Band 4	166 – 225	£78	
	Band 5	>225	£96	
Before March 2001	n/a	n/a	£96	

\* Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies.

**Community Care parking permit (half year, 6 months) – From April 2020**

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£30	Nil*
	Band 2	1 – 75	£90	
	Band 3	76 – 165	£300	
	Band 4	166 – 225	£390	
	Band 5	>225	£480	
Before March 2001	n/a	n/a	£480	

\* This new permit replaces the Neighbourhood Care (NHS) and Council (Social Care etc.) Permits. Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies.

**Statutory Undertaker parking permit (annual, 12 months) – From April 2020**

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£60	£480
	Band 2	1 – 75	£180	
	Band 3	76 – 165	£600	
	Band 4	166 – 225	£780	
	Band 5	>225	£960	
Before March 2001	n/a	n/a	£960	

\* Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies.

**Charity parking permit (annual, 12 months) – From April 2020**

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£10	£80
	Band 2	1 – 75	£25	
	Band 3	76 – 165	£85	
	Band 4	166 – 225	£105	
	Band 5	>225	£160	
Before March 2001	n/a	n/a	£160	

\* Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies.

PUBLIC NOTICE END