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Merton Council

Overview and Scrutiny Commission (Call-in)



Date: 14 August 2019

Time: 7.15 pm

Venue: Committee Rooms CDE, Merton Civic Centre, London Road, Morden, SM4 5DX

AGENDA

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Peter McCabe (Vice-Chair)
John Dehaney
Sally Kenny
Paul Kohler
Owen Pritchard
Nick McLean
Edward Gretton
Joan Henry
Natasha Irons

Substitute Members:

David Williams MBE JP
Thomas Barlow
Edward Foley
Ben Butler
David Chung
Simon McGrath

Co-opted Representatives

Helen Forbes, Parent Governor
Representative - Secondary and Special
Sector
Emma Lemon, Parent Governor
Representative - Primary Sector
Colin Powell, Church of England diocese

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Overview and Scrutiny describes the way Merton's scrutiny councillors hold the Council's Executive (the Cabinet) to account to make sure that they take the right decisions for the Borough. Scrutiny panels also carry out reviews of Council services or issues to identify ways the Council can improve or develop new policy to meet the needs of local people. From May 2008, the Overview & Scrutiny Commission and Panels have been restructured and the Panels renamed to reflect the Local Area Agreement strategic themes.

Scrutiny's work falls into four broad areas:

- ⇒ **Call-in:** If three (non-executive) councillors feel that a decision made by the Cabinet is inappropriate they can 'call the decision in' after it has been made to prevent the decision taking immediate effect. They can then interview the Cabinet Member or Council Officers and make recommendations to the decision-maker suggesting improvements.
- ⇒ **Policy Reviews:** The panels carry out detailed, evidence-based assessments of Council services or issues that affect the lives of local people. At the end of the review the panels issue a report setting out their findings and recommendations for improvement and present it to Cabinet and other partner agencies. During the reviews, panels will gather information, evidence and opinions from Council officers, external bodies and organisations and members of the public to help them understand the key issues relating to the review topic.
- ⇒ **One-Off Reviews:** Panels often want to have a quick, one-off review of a topic and will ask Council officers to come and speak to them about a particular service or issue before making recommendations to the Cabinet.
- ⇒ **Scrutiny of Council Documents:** Panels also examine key Council documents, such as the budget, the Business Plan and the Best Value Performance Plan.

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Committee: Overview and Scrutiny Commission

Date: 14 August 2019

Wards: All

Subject: Call-in of “public health, air quality and sustainable transport – a strategic approach to parking charges”

Lead officers: Chris Lee, Director of Environment and Regeneration; and

Dagmar Zeuner, Director of Public Health - Merton

Lead members : Councillor Martin Whelton, Cabinet Member for Regeneration, Housing and Transport; and Councillor Tobin Byers, cabinet member for Adult Social Care, Health and the Environment

Contact officer: Ben Stephens, Head of Parking Services

Recommendations:

- A. That the Overview and Scrutiny Commission consider the information provided in response to the two call-in requests and, separately for each one, decide whether to:
- Refer the decision back to Cabinet for reconsideration; or
 - Determine that the matter is contrary to the policy and/or budget framework and refer the matter to Full Council; or
 - Decide not to refer the matter back to Cabinet, in which case the decision shall take effect immediately.
-

1 PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1. This report provides a response to the points raised in each of the two call-in request relating to the decision taken by Cabinet on 15 July 2019

2 DETAILS

- 2.1. The call-in requests and documents provided in response to this are appended to this report.

3 ALTERNATIVE OPTIONS

- 3.1. The Council’s constitution requires the Commission to select one of the options listed in recommendation A.

4 CONSULTATION UNDERTAKEN OR PROPOSED

- 4.1. None for the purposes of this covering report.

5 TIMETABLE

- 5.1. None for the purposes of this covering report.

6 FINANCIAL, RESOURCE AND PROPERTY IMPLICATIONS

- 6.1. None for the purposes of this covering report.

7 LEGAL AND STATUTORY IMPLICATIONS

7.1. The Council's constitution requires the Commission to select one of the options listed in recommendation A.

8 HUMAN RIGHTS, EQUALITIES AND COMMUNITY COHESION IMPLICATIONS

8.1. None for the purposes of this covering report.

9 CRIME AND DISORDER IMPLICATIONS

9.1. None for the purposes of this covering report.

10 RISK MANAGEMENT AND HEALTH AND SAFETY IMPLICATIONS

10.1. None for the purposes of this covering report.

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

- Appendix A: report received by Cabinet, 15 July 2019
- Appendix B1: call-in request form (Liberal Democrat)
- Appendix B2: call-in request form (Conservative)
- Appendix C1: officers' response to the call-in
- Appendix C2: air quality action plan – weblink
- Appendix C3: annual mean NO2 monitoring results
- Appendix C4: Leader of Merton Council's letter to the Mayor of London
- Appendix C5: emails sent to equalities groups
- Appendix C6: EXEMPT - financial analysis of the parking charges increase
- Appendix D1: submissions received from residents' associations and individual residents
- Appendix D2: submission received from the Alliance of British Drivers
- Appendix D3: submission received from Love Wimbledon
- Appendix D4: submission received from Merton Liberal Democrat Group

12 BACKGROUND PAPERS

12.1. None for the purposes of this covering report.

Committee: Cabinet

Date: 15 July 2019

Wards: All

Subject: Public health, air quality and sustainable transport - a strategic approach to parking charges 4

Lead officers: Chris Lee, Director of Environment & Regeneration
Dagmar Zeuner, Director of Public Health-Merton

Lead members: Cllr Martin Whelton Regeneration, Housing and Transport
Cllr Tobin Byers (Cabinet member for Adult Social Care, Health and the Environment)

Contact officer: Ben Stephens, Head of Parking Services

1. RECOMMENDATIONS: CABINET

- 1.1. Members consider the responses made during the formal consultation process alongside any further references and considerations raised by the Sustainable Communities Overview and Scrutiny Panel.
- 1.2. Further to the consultation process, Members agree to the proposed charges set out in appendix 7 of this report including the following amendments
 - (i) Controlled Parking Zones: VNE, VNS, VN, VQ, VSW, VSW1, and VSW2, be re-categorised from Tier 1 to Tier 2 (as set out in Appendices 7 d & e)
 - (ii) That off street car parking charges in Queens Road Wimbledon and St Georges car park are reduced from the current £3 flat rate fee from 6.00pm to 11 pm to a £2 flat fee (as set out in Appendix 7 b).
 - (iii) The proposed charges for on street parking in appendix 7 (a) are approved.
 - (iv) The proposed charges for off street parking in appendix 7 (b) are approved.
 - (v) The proposed charges for Permits set out in appendix 7 (c-f) are approved.
- 1.3. Members agree to delegate authority to the Director of Environment and Regeneration, in consultation with the Cabinet Member for Regeneration, Housing and Transport, to finalise any operational matters in relation to the implementation of the proposals set out in the report.
- 1.4. To introduce the changes with effect from 1st September 2019, or as soon as practicable thereafter.

2. OVERVIEW

- 2.1. Merton is not prepared to ignore its responsibilities to deliver cleaner local air at a time when the current situation has been described as a global public health emergency. We are delivering a new Air Quality Action Plan that is ambitious in its aims and already demonstrates that we as an authority will use all of the powers available to us, not only to challenge and tackle this problem; but also to work towards delivering our legal responsibilities to protect the public.
- 2.2. The council recognises the part that it has to play in developing and delivering a framework to tackle air quality, demand for parking, and congestion in the borough. It does not stand alone on these issues. All of the other London boroughs are seeking to implement new parking policies to tackle similar problems.
- 2.3. There are very few direct levers available to stimulate a change in driver behaviour, and the council believes that the rationale for setting the new parking charges is about giving people the right nudge and opportunity to make different choices.
- 2.4. From November 2018 through to January 2019, Cabinet considered and agreed a series of reports setting out its approach to Public Health, air quality and sustainable transport – a strategic approach to parking charges. These reports set out the key strategic drivers that will affect parking policy for the future.
- 2.5. Then, and now, Members are requested to exercise their statutory duty to secure the expeditious, convenient and safe movement of traffic, and the provision of suitable and adequate parking facilities in the context of the public health agenda. This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.
- 2.6. This report supports the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.
- 2.7. The report explains the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by '**making the healthy choice the easy choice**'.
- 2.8. In setting out its measures of success, the new charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident

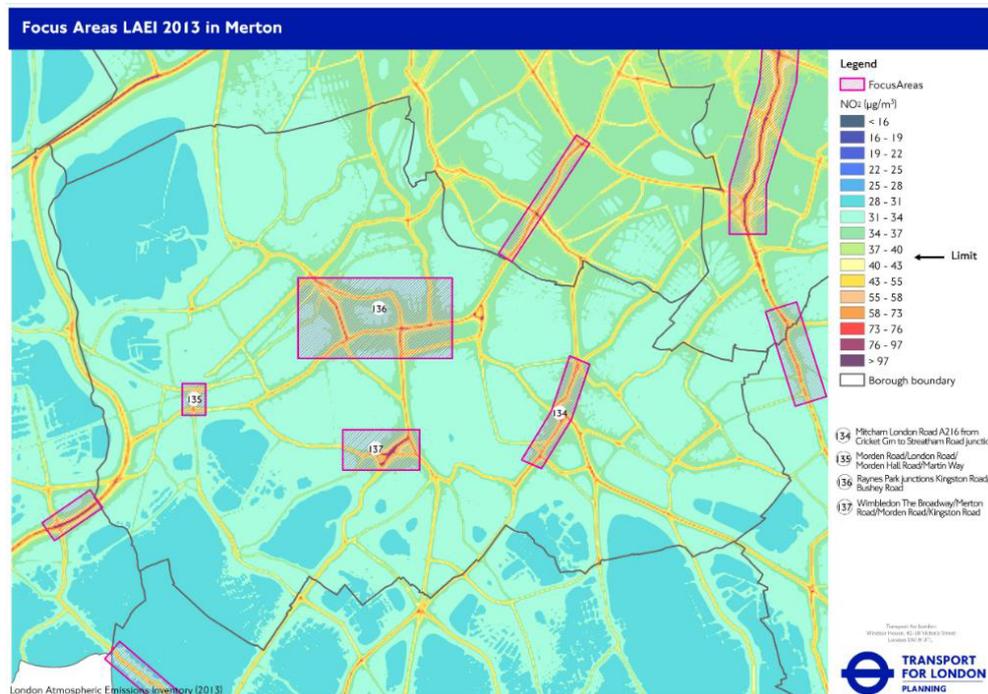
permits and lead to a rebalancing of our streets - to benefit residents and businesses alike.

- 2.9. In January 2019, Cabinet agreed to undertake a borough wide focussed consultation process to seek views on the underlying principles of the review and the proposed new charging structures. The details relating to the consultation process are set out in Section 9 of the report and the comments/detailed responses are set out in Appendices 1, 2, 3.
- 2.10. The purpose of this report is to reiterate the policy framework to support improved public health, air quality and sustainable transport across the Borough. To inform Members of the feedback received from the consultation exercise, to consider the council's rationale for amending its approach to parking charges, and finally to consider any proposed changes for consideration and agreement.
- 2.11. Local authorities are not permitted to use parking charges solely to raise income. When setting charges, we must instead focus on how the charges will contribute to delivering the Council's traffic management and other policy objectives.

3. THE CHALLENGE

- 3.1. We know that over 9,000 Londoners die a premature death through poor air quality. This issue has risen significantly in prominence and importance, where hardly a day goes by without a new article or scheme being proposed. Councils up and down the land are seeking new and bold solutions to what is a huge challenge.
- 3.2. The Mayor for London Sadiq Khan has rightfully placed growth, healthy people and places as the central theme of his adopted Transport Strategy. Merton Council is supportive of the strategy and in particular the adoption of healthy streets indicators when designing public realm improvements to make London's streets healthier places where people can be encouraged to choose walking and cycling as their choice of travel.
- 3.3. The Merton parking service already actively contributes to; and helps deliver the key policies set out in: Merton's Health and Wellbeing Strategy; Merton's Air Quality Action Plan; the Council's Local Implementation Plan; delivering the Governments' carbon reduction targets and the Mayor of London's Transport Strategy.
- 3.4. The London Borough of Merton historically and presently, continues to exceed targets and its legal objectives for local air pollution, including Nitrogen Dioxide (NO₂). The Government, local authorities and policy makers are being continuously challenged around delivering their responsibilities to reduce pollution, and are often criticised for lack of action or being slow to respond.

3.5. Air quality has been identified as a priority both nationally and within London, where pollution levels continue to exceed both EU limit values and UK air quality standards. Pollution concentrations in Merton continue to breach the legally binding air quality limits for both Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀). The air quality-monitoring network, run by Merton, has shown that the UK annual mean NO₂ objective (40µg/m³) continues to be breached at a number of locations across the borough including Colliers Wood, Morden, Tooting and South Wimbledon. In some locations, the NO₂ concentration is also in excess of the UK 1-hour air quality objective, which indicates a risk not only to people living in that area but also for those working or visiting the area. Reducing vehicle numbers (car usage) and different types of vehicle has a direct and tangible benefit on air quality.



- 3.6. In Merton, an Air Quality Management Area (AQMA) has been declared for the whole borough with four locations identified as having high levels of pollution and human exposure. These are in the main centres of Mitcham, Morden, Raynes Park and Wimbledon.
- 3.7. Poor air quality in Merton comes from a number of sources, but our legal exceedances are almost entirely due to road transport. Road transport accounts for approximately 60% of emissions of NO₂ in our borough. Simply put, this is due to traffic including the nature of vehicles on our roads, the volume of vehicles and the number of trips that they take.
- 3.8. By widening the difference in charges between electric vehicles and diesel cars, the proposed charges in part assist in the borough's response to climate change mitigation.

- 3.9. The latest evidence from the intergovernmental panel on climate change (IPCC) [1], and the Committee on Climate Change [2] suggests that deeper and faster cuts are needed to avoid irreversible damaging effects of climate change than in carbon dioxide (CO₂) previously thought. The Mayor of London's updated London Environment Strategy [3] already commits London to being a zero-carbon city by 2050, which goes beyond national requirements [4]. Climate groups have asked local authorities to declare a Climate Emergency and commit a target date to become carbon neutral. A number have already set ambitious decarbonisation targets and are developing their action plans.
- 3.10. There are approximately 88,000 vehicles registered in Merton, with 68% of households owning at least one car or van [5]. To achieve carbon neutral transport, Merton's residents would need to nearly eliminate the use of petrol and diesel cars by drastically reducing car journeys and switching to ultra-low emission vehicles such as electric vehicles. Most actions that support the council's aims to reduce air pollution from vehicles in transport and improve public health (e.g. encouraging increased walking and cycling) also reduce greenhouse gas emissions.

1

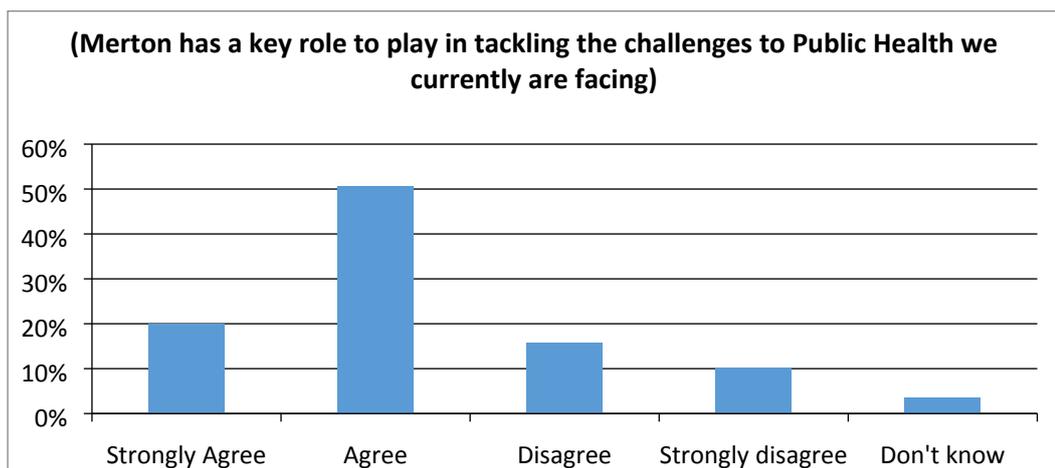
PUBLIC HEALTH

- 3.11. Public Health has a vision to protect and improve physical and mental health outcomes for the whole population in Merton throughout the life course, and to reduce health inequalities
- 3.12. The overall approach to achieving this vision is set out in the Merton Health and Wellbeing Strategy, which is produced by the Merton Health and Wellbeing Board. As explained in the last report to Cabinet, this strategy is being refreshed with a final version of the refreshed strategy expected to be approved by the Health and Wellbeing Board at its meeting on 25 June 2019.

¹ ¹ *List of sources*

1. ^[1] Intergovernmental Panel on Climate Change, Global Warming of 1.5 degrees, special report, October 2018 (<https://www.ipcc.ch/sr15/>)
2. Committee on Climate Change, Net-Zero, May 2019 (<https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/>)
3. ^[1] London Environment Strategy, May 2018 (<https://www.london.gov.uk/what-we-do/environment/london-environment-strategy>)
4. Climate Change Act, 2008, <https://www.legislation.gov.uk/ukpga/2008/27/contents>)
5. (source: VEH0105: Licensed vehicles by body type and local authority: United Kingdom)

- 3.13. Merton has a diverse and growing population. In 2018, Merton had an estimated resident population of 209,400, which is projected to increase by about 3.9% to 217,500 by 2025. The age profile is predicted to shift over this time, with notable growth in the proportions of older people (65 years and older) and a decline in the 0-4-year-old population.
- 3.14. Although current levels of health in Merton are similar or better to London and national averages, forecasts of current trends suggest, increasing burdens from obesity and diabetes and ongoing concerns about diseases related to poor air quality.
- 3.15. The essence of the public health argument for the proposed changes to parking charges are that they will encourage less car use, which in turn reduces two major risks to health: air pollution and sedentary behaviour.
- 3.16. The benefits to health of these reductions in health risks were detailed in the last report to Cabinet. In summary these are:
- Less air pollution. Poor air quality causes respiratory and cardiovascular disease, and the latest evidence shows effects on the brain hastening dementia and cognitive impairment in children.
 - Less sedentary behaviour. From a public health point of view, there is a strong argument for urgent and substantial action. Diabetes in Merton is increasing by about 2% per year, and it is estimated that 90% of new cases are potentially preventable. One in five children entering reception are currently overweight or obese, a figure which increases to one in three leaving primary school in Year 6. Almost 60% of Merton adults are overweight.
 - Healthy places: The 'healthy streets' approach defines a healthy street as one with things to see and do; places to stop and rest; shade and shelter; clean air; and pedestrians from all walks of life. Parking policy has its part to play alongside changes to the built environment to create healthy streets
- 3.17. The graph below is the response from the recent consultation specifically asking if Merton has a key role to play in tackling the challenges to public health we are currently facing.



- 3.18. It is clear from the response shown that over 70% of respondents agree/strongly agree that the Council has a key role to play in tackling the challenges to public health.
- 3.19. Parking policy has the potential to shape and define public health benefits. Improving air quality is important because 6.5% of mortality in Merton is attributable to poor air quality.
<https://fingertips.phe.org.uk/search/air%20pollution#page/0/gid/1/pat/6/par/E12000007/ati/101/are/E09000002/iid/30101/age/230/sex/4>

SUSTAINABLE ACTIVE TRAVEL

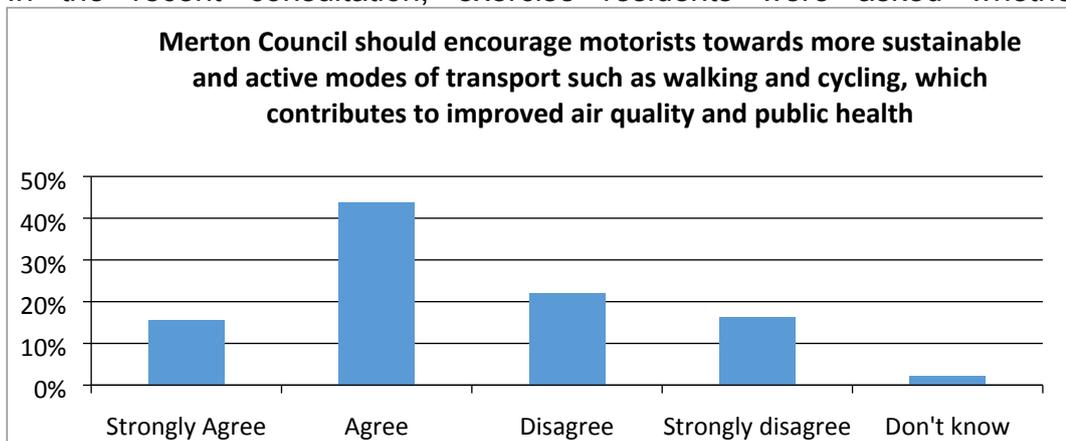
- 3.20. To get more people active, reduce air pollution and to promote healthier lifestyles the council intends to make walking and cycling the easy and preferred choice through the delivery of improved walking and cycling facilities.
- 3.21. In order to meet the Mayors Transport Strategy and to encourage more active travel, each London Borough is required to produce a Local Implementation Plan to focus on delivering tangible walking and cycling improvements. This approach aligns with the London Mayor’s aim that “Londoners do at least the 20 minutes of active travel they need to stay healthy each day” and Transport for London’s (TfL), Healthy Streets approach.
- 3.22. The third Local Implementation Plan (LIP) which is due to be published in the summer, sets out Merton’s Council’s three-year delivery programme for the period 2019/20 to 2020/22.
- 3.23. Over the last 6 years, Merton Council has spent £19.2m on a number of LIP 1 & 2 projects. This includes £4m on cycle related schemes (including cycle training). Approximately 6 km of cycle routes have been delivered alongside 651 additional cycle parking spaces.
- 3.24. The LIP 3 programme is set against a background of predicted employment, population and freight growth and; the demands it places on an increasingly congested transport system and the need to lessen and minimise the impacts on the environment and air quality. The consultation for this document

finished in May 2019 and the findings will be made available in the summer. LIP 3 contains a series of actions through to 2041.

These include:

- Reducing the impacts of climate change and improve local air quality.
- Improving connectivity and whole journey experience to the public transport network, especially for people with restricted mobility to support a more inclusive society.
- Reducing health inequalities
- Making Merton a safer place by reducing the number of collisions on our streets and supporting the Mayor's Vision Zero objective.
- Supporting good growth, especially around the town centres at Colliers Wood and South Wimbledon, Morden and Wimbledon.
- Redefining the way our streets are laid out and used, to encourage the take-up of more active and healthier lifestyles where people feel confident to walk and cycle safely.

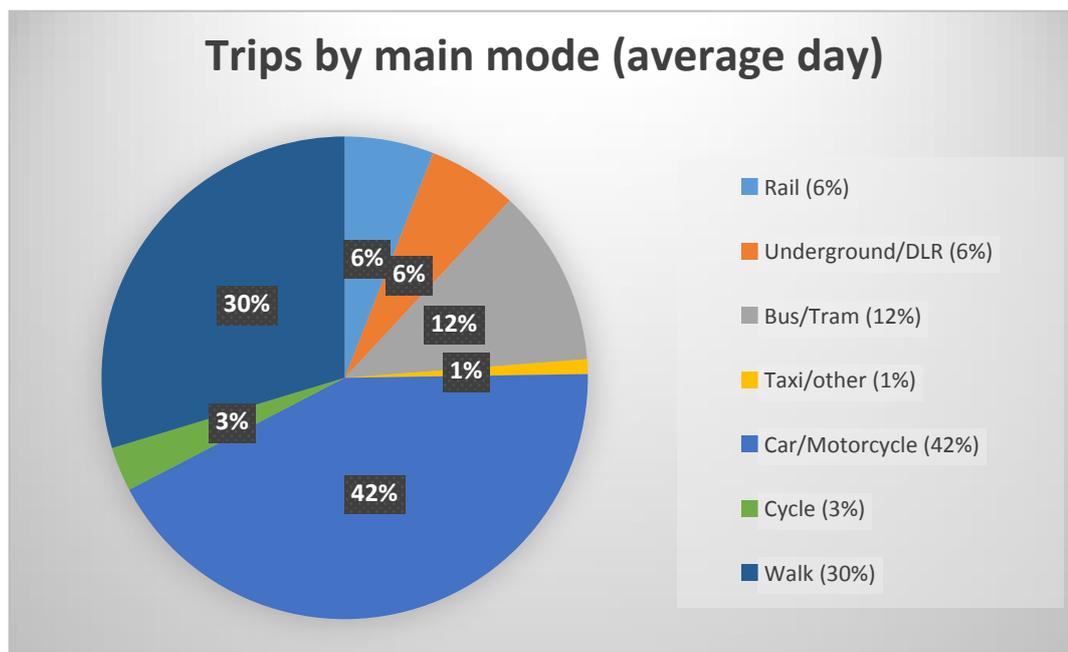
3.25. In the recent consultation, exercise residents were asked whether:



3.26. Just over half (60%) agreed that Merton Council should encourage motorists towards more sustainable and active modes of transport such as walking and cycling, which contributes to improved air quality and public health with (38%) disagreeing. Non-car owners were much more likely to agree (73%).

3.27. In Merton the modal share of walking, cycling and public transport is around 58 percent showing a worrying falling trend compared to previous years (down from 61%) and is just below the London average of 62.1% (source-Travel in London report 10).

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



- 3.29. In order to meet its share of the Mayor's 80 percent modal target, set at 73 percent for Merton it will be necessary to not only reverse the present trend, but to maintain a year on year increase in sustainable transport modal share. The level of physical activity has also declined in recent years from 38 percent of residents doing at least two x 10 minutes of active travel a day in 2013/14 to 2015/16 to 36 percent in 2014/15 to 2016/17. Furthermore, based on Department for Transport (DfT) statistics for 2016/17 the proportion of adults doing any walking or cycling once a week is 77.9% down from 81.5% for 2015/16.
- 3.30. Over one third of all car trips made by London residents could be walked in up to 25 minutes.
- 3.31. Although the level of cycling is broadly static, there remains significant potential to expand cycling (209,000 cycle trips or one per resident). However, only around 6% of these trips are currently achieved. A significant proportion of these potential cycle trips are undertaken by car, in particular trips to and from town centres, which coincides with the areas of poorest road safety for walking and cycling.
- 3.32. Merton is aiming to ensure that every resident has access to car club vehicles. There are 193,500 car club members in London and around ten car clubs. Transport for London (TfL) has committed to aiming for one million members by 2025. They offer a convenient and affordable service, while at the same time reducing overall car usage.
- 3.33. Car clubs can provide you with an alternative means of accessing a car when you need one, without all the cost or hassle of owning one yourself. You can find car club cars parked on street throughout Merton.

There are three car club companies available to the public in the borough, Bluecity, Zipcar and other TfL operators. There are currently on average over 60 vehicles operating in Merton with over 6,000 members.

- 3.34. The council is also developing its infrastructure for electric vehicles. Merton's ambition by 2021/22 is to facilitate 125 electric charge vehicle points across the borough, including fast, rapid and residential charge points. There are currently 94 in operation.

4. KEY THEMES HIGHLIGHTED IN THE CONSULTATION.

- 4.1. There are a number of key themes that reflect the responses received, following the consultation. This section of the report seeks to address the main points raised. A copy of the detailed consultation results and feedback can be found in Appendices 1-3.

Parking Demand and Supply

- 4.2. A number of comments and feedback suggested that there was no evidence to demonstrate that raising parking charges would reduce car use and lead to improved air quality. The council believes that there is evidence to show that the level of parking charges is likely to stimulate or nudge people into reducing car usage or removing their reliance on needing a car altogether.
- 4.3. The basic law of demand and supply states that more will be demanded at a lower price than that of a higher price. Parking charges have long been used to manage and regulate kerbside activity and provision.
- 4.4. The Canadian Parking Association produced a paper in 2015 titled The Value of Parking that looked at examples from a number of countries. This covers a wide range of points relating to the elasticity of demand for parking and the impact of fees on parking behaviour. The paper is available to read online at <https://canadianparking.ca/the-value-of-parking/>
- 4.5. Key points from the paper include:
- “The importance of parking is widely recognised, but car drivers are reluctant to pay even a small amount of money for parking.”
 - Parking fees are an efficient way of regulating parking. Offering free parking will lead to undesirable effects. The pivotal point in this is the low elasticity of parking demand. Even though parking demand in general is inelastic (meaning that the percentage change in parking demand will be smaller than the percentage change in parking fees) there is still an unequivocal link that increased charges will lead to a reduced demand, even if this is not proportional.
 - Previous reports on price have tended to concentrate on commuter parking only, which has a higher rate of inelasticity. Only a minority of people who use commuter parking facilities would consider alternative forms of transport or not making the trip at all.

- The report goes on to explain that there is also a difference in price elasticity between short and long-term effects. Car owners can adapt their long-term behaviour more easily than changing their habits on short-term notice. Long-term effects then can be more elastic than short time effects.
 - The report demonstrates that price elasticity for parking demand is strongly connected to the value that the car driver puts on certain types of trips (cross-elasticity). Highly valued trips will still take place, even when the price is high (low elasticity). When the value of a trip is considered lower, a driver may sooner skip the trip or find another solution (higher elasticity). Trips for dining out, recreation and unplanned shopping are likely to benefit from the nudge effect of stimulating drivers to change or amend their behaviours. Emergency trips, by their very nature, are unexpected and likely to account for a small number of overall trips made each day.
- 4.6. This latter point is illustrated in the following example where price increases led to a change in behaviour:
- *Congestion charge in central Stockholm – Findings indicate that the congestion tax in central Stockholm reduced ambient air pollution by 5 to 10 percent. This policy-induced change in pollution has been associated with a significant reduction in the rate of urgent care visits for asthma among children 0 to 5 years of age. Our estimates show that permanent reductions in air pollution from automobiles, even in locations, which have average pollution levels well below the current EPA standards, can have significant positive effects on children’s respiratory health.*
- Emilia Simeonova & Janet Currie & Peter Nilsson & Reed Walker, 2018. "Congestion Pricing, Air Pollution and Children’s Health," NBER Working Papers 24410, National Bureau of Economic Research, Inc.*
- 4.7. Further examples of where increased charges has stimulated direct behavioural change include:
- London Congestion Charge – The congestion charge was the first of its kind in the world. There was no evidence to prove it would be effective prior to its introduction, however its value and effectiveness have been scrutinised since. We know that in the first six months of operation of the charge, 60,000 less vehicle movements were recorded.
 - ULEZ – Since February 2017, when the Mayor announced the introduction of the T- charge as a stepping stone for the ULEZ, there has been a reduction in the total number of vehicles seen in the Central London ULEZ Zone (around 11,000 fewer vehicles per day)
- 4.8. Parking Fees an Economic Perspective – A further paper on the impact of parking charges and behaviour

<http://www.sciedu.ca/journal/index.php/ijba/article/viewFile/6626/3948> talks about the complementary relationship between vehicle parking, increases in parking fees and their proportionality in controlling vehicle growth rates and demand.

Key points include:

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

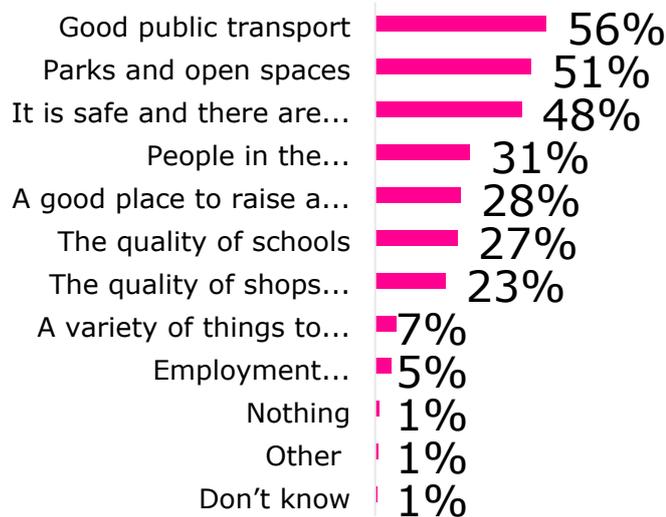
4.9. A comprehensive 2018 policy report by London Councils '**Benefits of Parking Management** in London August 2018' addressed many of these key principles. <https://www.londoncouncils.gov.uk/node/34485> The report stated that:

- Parking management is the only mechanism through which local authorities can ensure stationary vehicles are parked in an amenable and equitable manner, thus solidifying its importance and the benefit it delivers.
- There are many parking management benefits, which include reducing congestion, improving air quality, providing funding for parking and wider transport scheme improvements and ensuring good access and accessibility.
- Of particular significance is the fact that these benefits deliver benefit to everybody, from motorists themselves to the person sat at home, and all road users and non-road users in between.

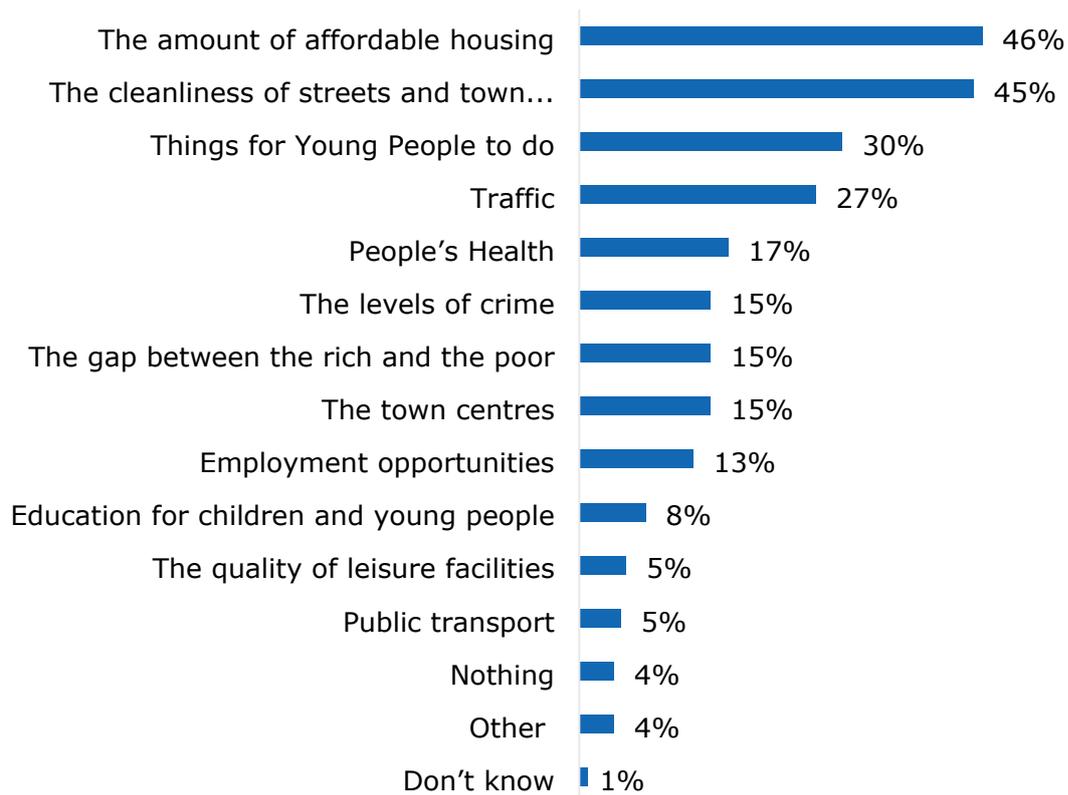
Public Transport Accessibility Levels (PTAL)

- 4.10. In cases where there is a reasonable opportunity to use public transport, or indeed walk or cycle, Merton's aim is to encourage everyone to use these options over the use of a motor vehicle. Generally, charges have been set higher where there is good transport links over less well-served areas. This is applicable to the proposed charges in CPZs, on street and in our car parks.
- 4.11. There is a significant difference in transport infrastructure and accessibility depending on where a resident lives, visits or works within the borough. This is presented in the form of a 'Public Transport Accessibility Levels' (PTAL) as set out by TfL and formed part of the review. TfL have grading's for each area of London – ranging from the highest to the lowest.
- 4.12. It is therefore easier in principle for a person living, visiting or commuting to a high PTAL rated area to use alternative sustainable of transport, compared to residents in low PTAL rated areas.
- 4.13. It should be noted many existing and new developments in high PTAL rated areas, are already car free, and a permit might not be purchased, and this forms part of the current planning process.

- 4.14. A recent residents survey highlighted public transport provision throughout the borough as most valued by residents.
- 4.15. All residents were asked to choose up to three things from a list, that they value the most in the London Borough of Merton. By far the most valued aspect of the borough is its public transport, with 56% choosing this. This is of greater importance to younger residents (61% aged 18-24 and 57% aged 25-44).



- 4.16. Following on from this, all residents were presented with another list and asked to specify which three they felt needed most improvement in the borough. It is encouraging to see that while public transport is the most valued aspect of the borough, only 5% of residents feel this is in need of improvement



- 4.17. Merton is very well connected to the public transport network with 10 mainline rail stations served by Thameslink (Wimbledon Loop), South Western Railway and Southern Rail services. A network of 28 bus routes also serves the borough; including 7 night buses, several of which run 24hrs a day.
- 4.18. Wimbledon Station serves as a sub-regional transport hub and is served by National Rail train services (South Western mainline), London Underground (District Line), London Trams and bus services. The suburban station at Mitcham Eastfields puts the east of the borough within 25 minutes of central London (Victoria and Blackfriars).
- 4.19. The Northern London Underground line also runs through the borough and terminates at Morden, (including a night-time service, which runs on Fridays and Saturdays every 8 minutes between Morden and Camden Town and approximately every 15 minutes from Camden Town to High Barnet/Edgware.
- 4.20. Following the consultation process the council has reviewed the PTAL rating for each CPZ and walking distances to main line, tram and underground stations access, and it is recommended that controlled parking zones VNE, VNS, VN, VQ, VSW, VSW1, VSW2, be re-categorised as Tier 2 from Tier 1. as shown in Appendices 7d - 7f.

Parked Cars

- 4.21. A number of respondents stated that parked cars do not pollute. No car is bought just to be parked; it is bought to be driven. How often and how far does vary, but it will be driven. The principle of charging based on location to public transport and local amenities is that it is easier to travel without the car on a day-to-day basis, than from locations with poorer access to amenities and public transport.

Through Traffic & Congestion

- 4.22. A number of representations highlighted a range of traffic and road safety issues/ concerns, often with a link to the likelihood of individuals choosing cycling and walking over the use of a car. The point was also made that through traffic as opposed to parked cars were the primary contributor to poor air quality. There were also comments about HGVs, Taxi's, buses and other transport being a contributor to the problem, and that the council should look to address these issues.
- 4.23. The council acknowledges there is no one simple solution to the growing problem of poor air quality and other transport related matters caused by increased car ownership and general traffic with the borough and London more widely. The council has a duty and we are addressing the many concerns in respect of 'other factors', which contribute to poor air quality and congestion.
- 4.24. The council will continue to lobby Government and work with TfL to reduce HGV emissions. The Mayor of London is taking action with the new Ultra Low Emission Zones, which has the ambition to push the change towards cleaner and less polluting vehicles as quickly as possible.
- 4.25. In order to nudge people towards active transport we must ensure our streets are safe. We will therefore embrace the Vision Zero targets to eliminate fatal and serious casualties by 2041 and are currently rolling out borough-wide 20 mph speed limit zones.

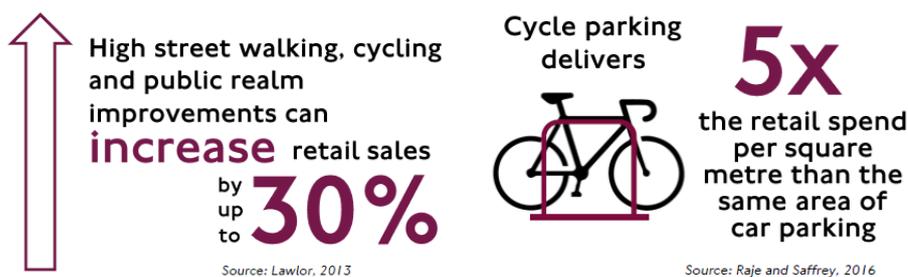
What is the income from parking charges used for?

- 4.26. The council can only spend the money it receives from parking charges in the manner set out in the Road Traffic Regulation Act 1984 (RTRA) which directs that income can be used for certain purposes only.
- 4.27. A number of the responses received questioned what parking revenue is spent on. The RTRA allows authorities to spend income on the day-to-day management of the parking service, to fund Freedom passes, transport related expenditure, environmental improvements, and maintenance and upgrades to carriageways and footpaths within the borough.
- 4.28. The Freedom Pass is London's concessionary travel scheme, which allows free travel for older and disabled people across London's entire public transport network and on local bus services across England during off-peak hours.

- 4.29. The benefit of the Freedom Pass is that it enables older and disabled people right across London to lead more active, happier and healthier lives, facilitating social inclusion and ensuring their continued participation in society. Parking management therefore plays a fundamentally important role in enabling this service to exist.
- 4.30. In 2016/17, the Freedom Pass cost London boroughs £355million. This cost is raised from parking revenue – both charges and penalties. This means that motorists are effectively subsidising the provisions that allow older and disabled people to get about London.
- 4.31. Over the last 3 years Merton has spent approximately £27m on freedom passes.

High street, business and town centre considerations

- 4.32. Further closures of familiar chains and primary department stores continue to be a concern for our high streets. Even with no significant increase in charges for approximately 10 years, alongside the introduction of 20-minute free bays, the impact of online shopping has changed the dynamics of the high street. This has also affected the night-time economy.
- 4.33. The council is mindful of these challenges and received written submissions from the business sector, including the Wimbledon Society and Love Wimbledon BID.
- 4.34. In order to assist businesses and support the night-time economy, the Council recommends a reduction in charges in the underused car parks of St Georges and Queens Road to a flat fee of £2 between 6pm and 11pm.
- 4.35. The council will also continue its commitment to the free twenty-minute parking bays.
- 4.36. Although there is a perceived risk that a reduction in cars to high streets will have a detrimental effect, a recent report by TfL (November 2018) demonstrates the economic benefits of walking and cycling.

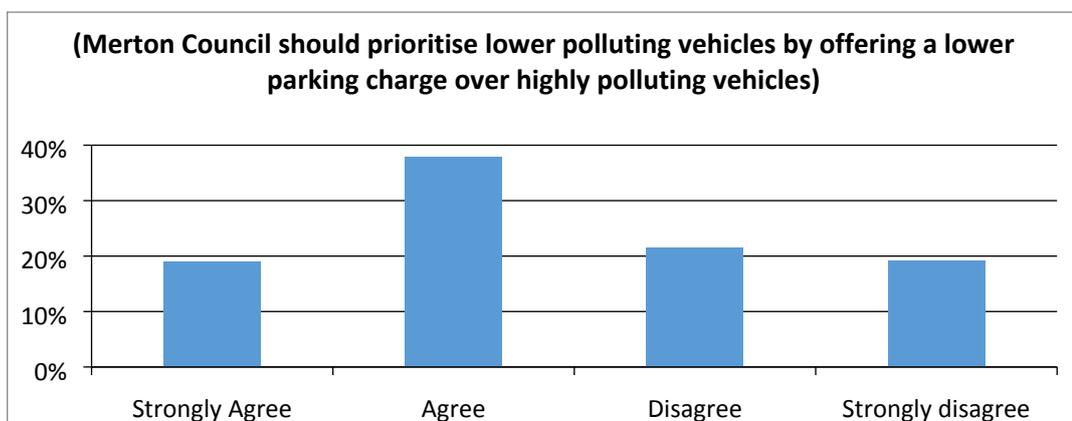


Emissions and Diesel Levy

- 4.37. The council has committed to reviewing the impact of the existing diesel levy and the potential for future emissions based charging within Merton. The report will be presented to Cabinet later this year and all of the comments received in the consultation will be considered in the future review.

- 4.38. Although emissions based charging is not being dealt with in this report, the Council notes the result from the consultation survey set out below.

Data from online survey results



Disabled and carer permits/drivers

- 4.39. Merton is committed to supporting its residents that have mobility issues, and there are a number of ways we currently support this objective.
- 4.40. Merton is a member of the national Blue Badge scheme. The Blue Badge provides a range of parking and other motoring concessions for people who are registered blind or have severe mobility problems. Blue Badge holders can park free of charge in any Merton disabled parking bay, pay & display and shared use bay or permit holder bay.
- 4.41. Later this year the Blue Badge eligibility scheme will be extended to those with a wide range of mental health issues that affect their mobility. This will extend our current provision to support additional residents within the Borough.
- 4.42. A Blue Badge holder in Merton is entitled to apply for a free carer permit under certain conditions. This is to further support those residents with mobility issues and in need of regular support and care. The carer permit eligibility is based on being a Blue Badge holder.

Charging Levels

- 4.43. Charges have been considered and set at levels, which will challenge driver behaviour and choices with the aim of reducing car use and ownership. The council is mindful of economic challenges facing many residents and visitors to the borough, but also needs to meet obligations to reduce poor levels of air quality and improve public health, increase cycling, walking and use of public transport. There have been no increases to parking charges for several years.
- 4.44. A large number of respondents felt that the proposed increased charges were too high. In addition, they were concerned that the charges when the CPZ was set up were initially just to cover costs but now appeared to be an

additional tax. A large number of respondents also highlighted that the proposed increased charges would have a big financial impact on them and that they could not afford to change their vehicle.

- 4.45. The new charges are considered a reasonable amount to nudge residents and visitors to consider their car use and alternative travel choices. For example, in the highest proposed CPZ permit charge area (£150) this equates to 41 pence per day. Over 70% of on street spaces are priced at £3 or under per hour.

5. PROPOSED NEW CHARGES

- 5.1. Like many outer London boroughs, the private car continues to take a leading role in meeting travel demand with around 43% of daily trips by car. There are currently around 88,000 vehicles in Merton or just over one vehicle per household. Car ownership has increased consistently over previous years.
- 5.2. Approximately 31.4% of households have no car (2014/15 -2016/17). Many roads are overcrowded during peak periods adding to air quality, noise and road safety concerns. In addition, annual vehicle kilometres travelled is also increasing.
- 5.3. A number of parking charges have evolved over the years and have met the needs for specific areas and schemes at a particular point in time. There were minor adjustments in 2015, but no significant review has been undertaken since before 2010. However, in this review the opportunity to further simplify the charges has been taken. Likewise, the proposals seek to further strengthen and develop the links between Public Health, air quality and how future charges can moderate parking behaviour.
- 5.4. Over the last 10 years where car parking and permit prices have been frozen the number of cars registered in Merton rose from 69,500 to 71,900. Whilst car ownership in the borough has started to decline over the last 12 months' overall car ownership has risen by approximately 3.3% over the last 10 years.
- 5.5. Future charging levels, that are too low, will not meet our future strategic objectives to improve public health and air quality, increase active travel and see the level of car ownership decrease.
- 5.6. The previous reports set out four basic principles, which set out the rationale that underpin the proposed charging structure:-
- (i). Ease of access to public transport
 - (ii). Air Quality indicators
 - (iii). Parking demand and space availability
 - (iv). Enforcement requirements

(i) Ease of access to public transport:

5.7. In proposing the grouping and charge levels of each CPZ. Each CPZ was assessed against PTAL levels and as a guide, the criteria set out below:

- CPZs within 20 minutes' walk of an (1) underground **and** (2) mainline station and tram stop are in Tier 1.
- CPZs within 20-minute walk of (1) an underground **or** (2) mainline station are Tier 2.
- CPZs with no access to a mainline or an underground station within an approx. 20-minute walk are Tier 3.
- There are buses in many cases which complement access to train and tram provision within the borough.

(ii) Air Quality:

5.8. Merton's air quality levels are poor. A charging structure, that helps to change habits and car ownership throughout the borough, will have a beneficial medium to long-term effect. A number of hotspots coincide with areas of high parking demand and traffic movement. e.g. Wimbledon Town Centre. These focus areas align themselves with some of the more congested areas of the borough, and support the recommendations, which aim to address air quality issues.

(iii) Areas of high parking demand

5.9. Parking demand varies within the borough. Higher Charges are being proposed in areas of high demand to encourage the journey to be made either by walking, cycling or public transport, rather than by the use of a car.

(iv) Enforcement requirements

5.10. It is recommended to align charges with the hours of operation of the permit bays. For example, permits for a CPZ that are controlled for a shorter period, should cost less than permits for zones that are controlled for a longer period. There is a direct cost of enforcement, dependant on the length of time a scheme is operational. This is reflected in the proposed cost of a permit.

Proposed On Street charging structure

5.11. Based on the above criteria the summary table below shows the proposed charging structure. It is therefore recommended that on street parking be categorised into four broad zones as set out below.

Zone No.	No. of on Street Bays	Description	Air Quality focus area	PTAL level. Access to transport.	Parking demand
Zone 1	255	Wimbledon Town Centre – Primary Shopping zone, Broadway and Wimbledon Bridge & Hill	137	6b, a & 5	High >100
Zone1 a	120	Roads near/off High Street Wimbledon Village to serve as a reduced cost parking area, including The Causeway, South Side Common,		2 & 1	Medium/ High 71%-100%
Zone 2	2547	North of the Borough. Including Wimbledon Village, Wimbledon Park, South Wimbledon, Raynes Park. Colliers Wood,	Part 137	5, 4 & 3	Medium/ High 71%-100%
Zone 3	722	South including, Mitcham, Morden and other areas not specified.	Part 134, 135.	Morden Centre 5, Mitcham 4, Other areas, 3, 2, & 1	0-70% Lower demand

Zone 1 – On Street Parking

5.12. Wimbledon Town Centre has the highest demand for on-street parking in the borough, and greater stimulus will be necessary to manage this compared to on-street locations elsewhere within the Borough. A key issue has been identified at peak times, where vehicles wait for on-street spaces to be freed up, adding to congestion problems. Existing periods of maximum stay would be retained to further help manage turnover of spaces and reduce congestion. In this area, there are 255 bays where the higher charge of £4.50 per hour is applicable. This is in comparison to 3389 pay and display bays across the borough prices at £3 or below.

Zone 1 a – On Street Parking

5.13. There are no car parks in Wimbledon Village and therefore no obvious alternatives for customers to park anywhere other than at the kerbside. To facilitate parking in the vicinity, but off the high street itself, a lower charge is recommended for the bays in The Causeway and South Side Common, to provide an obvious alternative to parking on the congested High Street, and

help maintain the vitality of the area. Of course, the use of sustainable transport or active transport is always preferred, but it is recognised that some car use must be catered for. There are approximately 120 spaces in this area, for which it is proposed to set the lower charge level of £1.50 per hour to encourage parking away from the High Street.

Zone 2 & 3 – On Street Parking

- 5.14. The same principles apply as in Zone 1, but demand and capacity are not as high. Charges are proposed in Zone 2 at £3.00 & Zone 3, at £1.50. It is believed that this charge achieves a regular turnover of spaces, and nudges drivers towards considering alternative more sustainable forms of transport. Many of the shops and businesses in this area serve local residents, which can be visited in many cases by a short walk.
- 5.15. Members are reminded there are a high number of locations within the borough that offer 20 minutes free parking to help with the vitality of local shopping parades. The council subsidises these bays at a cost of circa £300k per year. Many of these bays are in fact the most congested bays in the borough causing significant ‘cruising’ and related congestion.
- 5.16. Notwithstanding the above, the council will continue to support this provision to assist local businesses.
- 5.17. In order to provide further support for local businesses and to support the night time economy, the council recommends a reduction in charges in the underused car parks of St Georges Road and Queens Road to a flat fee of £2 between 6pm and 11pm.

Table of proposed charges.

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

Note: Areas shown are general description.

On Street Benchmarking Data

- 5.18. Only 255 bays (or 7% of all available bays in Merton are in Zone 1 Wimbledon Town Centre) at a charge of £4.50 per hour, which ranks Merton 9th against other London boroughs.

Ranking in order of cost	Borough	Most expensive on-street tariff (per hour)
1	Camden	£7.20
2	Southwark	£6.50
3	Islington	£6.20
4	Lambeth	£5.40
5	Kensington & Chelsea	£5.10
6	Hackney	£5.00
6	Tower Hamlets	£5.00
8	Westminster	£4.90
9	Merton Zone 1	£4.50
10	Bromley	£4.00
11	Wandsworth	£3.40
12	Haringey	£3.30
13	Hammersmith & Fulham	£3.20
14	Richmond	£3.00
14	Greenwich	£3.00
14	Ealing	£3.00
14	Sutton	£3.00
18	Croydon	£2.60
18	Redbridge	£2.60
20	Brent	£2.50
21	Kingston upon Thames	£2.40
21	Harrow	£2.40
21	Hillingdon	£2.40
24	Enfield	£2.00
24	Waltham Forest	£2.00
24	Newham	£2.00
27	Barking & Dagenham	£1.50
28	Bexley	£1.40
29	Havering	£1.00

No available data for Lewisham, Hounslow, Barnet.

OFF STREET (CAR PARK) CHARGES

- 5.19. Existing hourly charges in the borough's car parks vary from 30p to £1.50 per hour. The review has considered these charges and made recommendations, which link, to the geographic area, and transport accessibility and congestion at each car park.
- 5.20. The charge set reflects the level of PTAL rating and level of congestion. If customers have a genuine and easy choice to use public transport, or active transport, this should be encouraged. A higher charge is set at a level, which requires the 'customer to consider' their mode of transport. This is a proven and appropriate transport management tool.
- 5.21. To ensure the usage of the car parks are maximised, lower charges have been set off street than on street, by geographical area. This incentive will help prevent congestion on high streets and busy town centres, resulting in reduced roadside emissions, and addressing key air quality issues in the borough.

Table of proposed charges. - car parks

CAR PARK (Inclusive of VAT).	Current hourly rate/flat fee	Proposed hourly rate/flat fee per day	Amendments Following consultation
WIMBLEDON			
Broadway	£1.00	£2.00	
Hartfield Road	£1.50	£2.00	
Queens Road	£1.00	£1.50	£2 <u>flat</u> fee between 6pm and 11pm.
St Georges Road	£1.40	£1.50	£2 <u>flat</u> fee between 6pm and 11pm.
MORDEN			
Kenley Road (flat fee per day)	£3.50	£7.00	
Morden Park (hourly)	£0.40	£0.60	
Morden Park (flat fee per day)	£5.00	£7.00	
Peel House Lower	£0.40	£0.60	
Peel House Upper (flat fee per day)	£5.00	£7.00	
Peel House Upper (hourly)	£0.50	£0.60	
York Close (flat fee per day)	£5.00	£7.00	
York Close (hourly)	£1.00	£1.20	
MITCHAM			
Elm Nursery	£0.50	£0.60	
Raleigh Gardens	£0.50	£0.60	
St Marks Road	£0.40	£0.60	
Sibthorpe Road	£0.70	£0.90	

Benchmarking Off Street Charges

- 5.22. We aim to have charges that encourage motorists to use car parks rather than on street locations. The table below shows Merton to be competitive when comparing each boroughs highest published charge. We will keep this under review so that it is commensurate with our objectives.

Ranking in order of cost	Borough	Most expensive off-street tariff (per hour)
1	Kensington & Chelsea	£5.10
2	Lambeth	£3.00
2	Greenwich	£3.00
4	Tower Hamlets	£2.40
5	Richmond	£2.35
6	Kingston upon Thames	£2.30
7	Hammersmith & Fulham	£2.20
8	Sutton	£2.00
8	Waltham Forest	£2.00
8	Newham	£2.00
8	Merton (proposed)	£2.00
12	Hackney	£1.60
12	Harrow	£1.60
14	Ealing	£1.50
14	Redbridge	£1.50
14	Brent	£1.50
17	Enfield	£1.40
17	Lewisham	£1.40
19	Croydon	£1.30
20	Haringey	£1.25
21	Bromley	£1.20
21	Bexley	£1.20
23	Southwark	£1.00
23	Hillingdon	£1.00
25	Havering	£0.75

Note: other boroughs either do not own or manage car parks directly or no data is available including: Camden, Islington, Westminster, Wandsworth, Barking & Dagenham

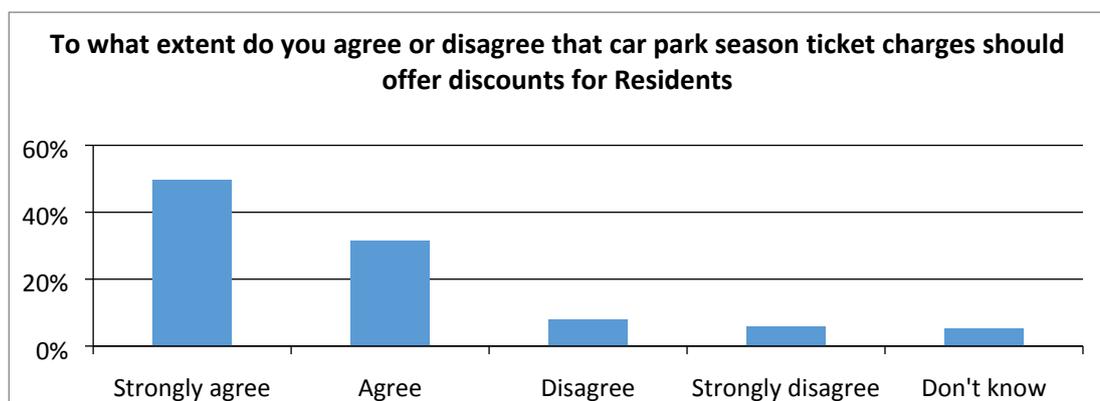
CAR PARK SEASON TICKETS

- 5.23. The cost of a car park season ticket has been frozen for 14 years.
- 5.24. In real terms, there has been a significant reduction in the cost of season tickets. The review considered an appropriate charge to be one that is comparable with other authority charges, and challenges motorists to consider other more sustainable forms of transport.
- 5.25. The current charge for a 12-month season ticket in a Morden car Park is £445. This equates to £1.78 per full days parking, (based on 250 working days per year), a price which does not support our aspirations of active travel and modal shift.
- 5.26. It is proposed to offer a significantly reduced charge of £20 total fee, in our car parks, to 'fully electric vehicles' (for season ticket sales) as a direct incentive to change the nature of vehicle ownership. This offer could provide users with a saving of up to approximately £1,300 per year.
- 5.27. The diesel surcharge on parking permits is not currently applied to car park season tickets. It is recommended that the diesel surcharge of £150 should be applied to customers applying for a season ticket in the same way as a resident purchasing a permit for a CPZ.

Season ticket charges

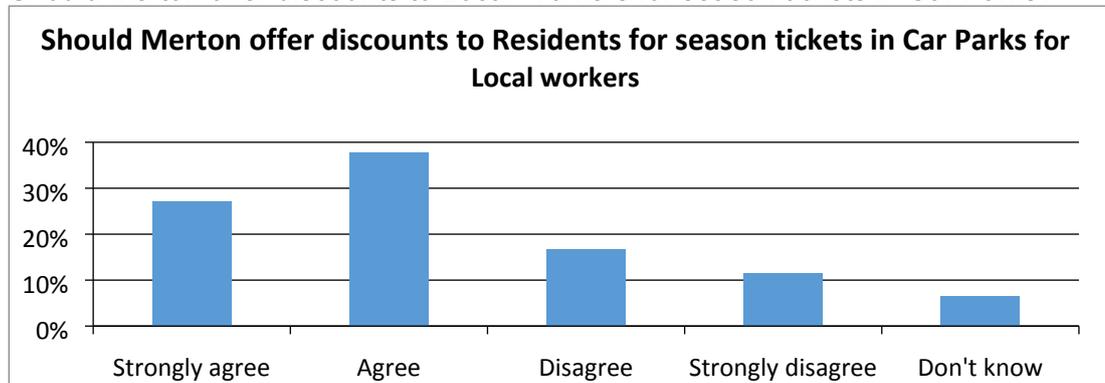
- 5.28. The principle of a discount for purchasing a season ticket already exists. It recognises that not all employees work every day at their office or place of work for various reasons e.g. annual leave. Without a discount, there would be no incentive for customers to buy season tickets, which is a convenience for them, and assists the council with not having to bank and collect cash on a regular basis.
- 5.29. Results from the online survey show that there was clear agreement that car park season tickets should offer discounts to residents,

Should Merton offer discounts to residents for season tickets in car parks?



5.30. In addition, there was further agreement that discounts should be offered to local workers for the purchase of season tickets in car parks. The proposals for a differential between commuters with and onward journey and parkers who either worked locally or are residents of the borough were set out in earlier reports and it is recommended these principles should be approved along with the proposed charges set out in the tables below.

Should Merton offer discounts to Local Workers for season tickets in Car Parks?



Mitcham Car Parks

5.31. Car parks in Mitcham are currently underutilised and do not have the same over use and capacity issues as many other car parks in the borough. Charges have therefore been proposed to reflect the current situation.

Mitcham Car Park	1 Month	+ 1 Month Diesel Surcharge £12.50	6 Months	6 month Diesel Surcharge £75	12 Months	12 Month Diesel Surcharge £150
Current charge	£25	N/A	£150	N/A	£300	N/A
Proposed local worker/ resident	£62.50	£75	£225	£300	£300	£450
Proposed commuter	£62.50	£75	£300	£375	£525	£675

Morden Car Parks

5.32. The charges in the table below show a minor adjustment downwards to the original proposed charges. The charges set out in the table offer a 10% discount for a commuter buying a 3-month season ticket, 20% for a 6-month season ticket and 30% for a 12-month season ticket.

5.33. In the case of a local worker or resident, a discount of 20% for a 3-month season ticket, 40% for a 6-month season ticket, and 60% for a 12-month season ticket will be offered.

Morden	3 Months	3 Month Diesel Surcharge £37.50	6 Months	6 month Diesel Surcharge £75	12 Months	12 Month Diesel Surcharge £150
Current charge	£1111	n/a	£223	n/a	£445	n/a
Proposed local worker/ resident	£350	£387.50	£525	£600	£700	£850
Proposed commuter	£393.75	£431.25	£700	£775	£1,225	£1,375

Queens Road Car Park Wimbledon

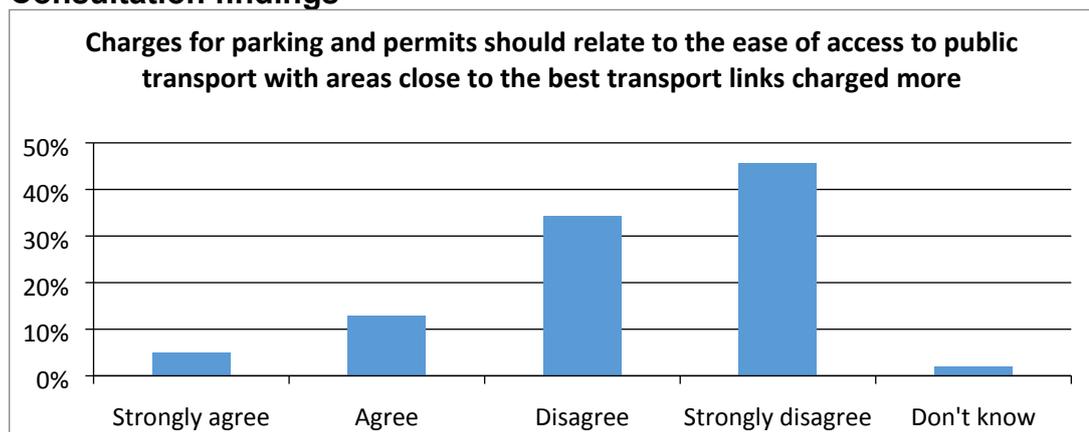
- 5.34. A mixture of commuters and local shoppers uses this car park. Demand varies throughout the year and at different times of the week. Given the nature and use of this car park, the following charges are proposed.

Queens Road -Wimbledon	3 Months	3 Month Diesel Surcharge £37.50	6 Months	6 month Diesel Surcharge £75	12 months	12 Month Diesel Surcharge £150
Current	£240	N/A	£480	N/A	N/A	N/A
Proposed local worker/ resident	£300	£337.50	£600	£675	N/A	N/A
Proposed commuter	£337.50	£375	£675	£750	N/A	N/A

RESIDENTIAL PARKING PERMITS

- 5.35. Resident permit charges have been frozen since 2009, which means in real terms they have reduced in price for 10 years.
- 5.36. The review considered an appropriate price to be one that challenges motorists to consider the use of other more sustainable forms of transport.
- 5.37. The sale and price of permits is another way the council can influence car/vehicle use within the borough and directly contribute to the MTP, LIP and AQAP objectives.

Consultation findings



- 5.38. A number of residents highlighted the lack of public transport in specific areas of the borough. Representation highlighted that in some CPZs there could be more than 20-minute walk to reach a main line station or underground station. Although buses may provide alternative transport, it is accepted that access to public transport did vary within each area of the borough. The recent Residents survey referred to the provision of public transport within the borough, as being the most highly valued.
- 5.39. In reviewing the PTAL rating for each CPZ and further analysing walking distances to main line, tram and underground stations access, it is recommended that Controlled Parking Zones VNE, VNS, VN, VQ, VSW, VSW1, VSW2, be re-categorised as Tier 2 from Tier 1 as shown in Appendices 7d – 7f.
- 5.40. A high percentage of respondents did state that they considered the charges too high. Proposed charges took into consideration charge levels in other boroughs and general affordability. Although this increase may not be significant enough to have a direct and dramatic effect in the short term, it is an action the council consider very important in meeting its legal obligations to affect driver behaviour and car ownership for the reasons set out in detail throughout this and previous reports.
- 5.41. The principle of charges based on access to public transport had limited support as shown in the graph above at 6.37. However, some respondents agreed that certain areas are well served by public transport and supported the PTAL approach. The consultation responses did not identify any evidence or argument to undermine the case for charges linked to PTAL.

Zone duration	Tier 1 zones Wimbledon Town Centre	Tier 2 zones Part Colliers Wood/ South Wimbledon/ Rayne's Park/ Morden	Tier 3 zones Mitcham/ Part Colliers Wood	*100% electric vehicles All zones
Long (12 to 14.5 hrs)	£150	£130	£90	£20
Medium (6 to 10 hrs)	£120	£110	£80	£20
Short (1 to 4 hrs)	£110	£100	£70	£20

*The £20 fee is a reduction of £5 on the existing charge.

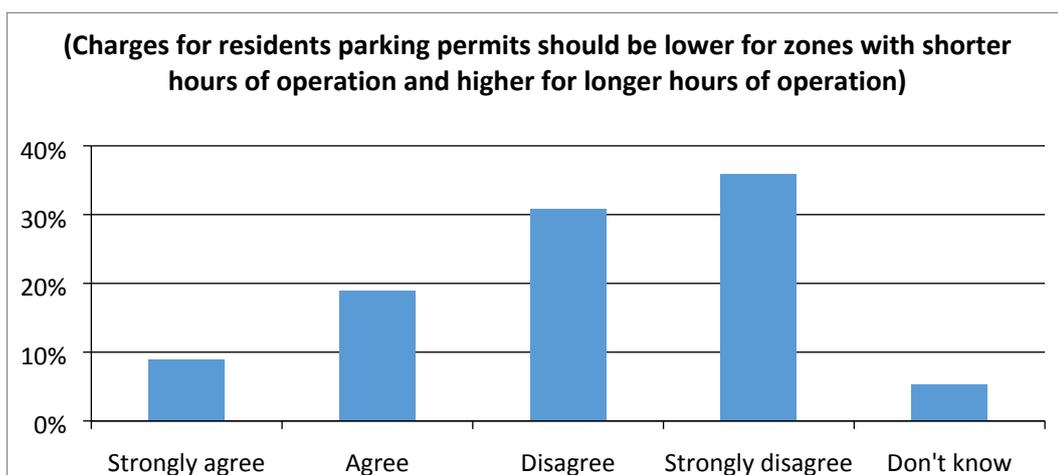
- 5.42. The Council is keen to continue to promote the use of electric vehicles and the new recommended charge for a permit for an electric vehicle is £20.
- 5.43. Note: A surcharge of £150 will continue to apply for diesel vehicles.

Houses with multiple permits.

- 5.44. The proposed charge for a second permit at the same property should incur a £50 surcharge, a third permit a £100 surcharge and a fourth permit at £150 surcharge.
- 5.45. Note: A further surcharge of £150 will continue to apply for diesel vehicles and will be applied to the cost of the original permit and the surcharges listed in 6.44 above.
- 5.46. The purpose of this charging scheme is to discourage multiple cars at one address. In the case of houses with multiple vehicles/permits, it is considered reasonable that those sharing the property could consider some form of car sharing. It is recommended this principle remains and details of the individual charges can be found in appendices 7d – 7f.

Hours of operation/enforcement

- 5.47. It is recommended to align charges with the hours of operation of the permit bays. For example, a CPZ that is controlled for a shorter period should cost less than CPZs that are controlled for a longer period. There is a direct cost of enforcement depending on the length of time a scheme is operational, and it is recommended this should be reflected in the cost of a permit.
- 5.48. Should this be agreed then there will need to be a process of considering amendments to CPZ operating hours. Officers will develop appropriate arrangements allowing residents to petition for changes and for them to be considered appropriately. It should be noted though that hours of operation generally reflect residents' demands, and the prevailing environment and demand. The maximum variable between short and long zones is between £20 & £40 per annum.



Benchmarking Residential Permits:

5.49. The tables below provide a comparison with different London boroughs showing the proposed Merton charges in relation to resident permits.

Cost	Highest priced residential permit by council (2019/20)
£250 - £500	Islington £490, Lambeth £306, Camden £296, Haringey £289, Hackney £264,
£151 - £250	Brent, £241 Kensington & Chelsea £236, Tower Hamlets 186, Wandsworth £183, Enfield, £165,
£0 - £150	Bexley £150, Sutton £150, Merton £150 tier 1 , Westminster £145, Barking and Dagenham £140, Waltham Forest £140, Ealing £125, Lewisham £120, Hammersmith and Fulham £119, Richmond £114, Bromley 100, Greenwich 100, Kinston £90, Croydon £80, Hounslow £80, Harrow £79, Havering £35, Redbridge £20.

Visitor Voucher Charges

5.50. The proposed charges are:

Tier	Half day	Full day
Tier 1 zones	£3.50	£5
Tier 2 zones	£3	£4
Tier 3 zones	£2	£3

Visitor Voucher Charges Benchmarking Data

Cost	Highest priced visitor voucher by council (2019/20)
£5 plus	Hammersmith £18, Islington £15.20, Richmond £8.40, Camden £7.23, Tower Hamlets £5.80, Wandsworth £7.70, Hounslow £7.50, Lambeth £5.37, Lewisham £5.60,
£2 - £5.	Newham £5, Waltham Forest £5, Merton £5 Tier 1 , Brent £4.50. Hackney £4, Croydon £4, Bromley £3.66,

Annual Visitor Permits

5.51. The proposed charges are set out in Appendices 7d – 7f.

6. FINANCIAL, RESOURCE AND PROPERTY IMPLICATIONS

- 6.1. Any increase in parking charges will inevitably have an effect on parking income. This is difficult to accurately predict since we are seeking to change motorists' behaviour and reduce car usage. As such, the current Medium Term Financial Strategy (MTFS) savings of £1.9m in 2019/20 and a further £1.9m in 2020/21 reflect assumptions on estimated decreases in demand across each income stream e.g. resident permits, visitor permits, pay etc. These assumptions will continue to be monitored and updated taking into account any agreed changes in fees and in motorists' behaviour.
- 6.2. The estimated 2019/20 income of £1.9m was based on an implementation Date of 1st October 2019. The overall level of income that will be achieved will be dependent on the actual implementation date and level of charges agreed following due process and consideration. It is important to note that the raising of income is not a contributing factor to any decision making process.
- 6.3. Local authorities are not permitted to use parking charges solely to raise income. When setting charges the focus must be on how the charges will contribute to delivering the Council's traffic management and key sustainability objectives.

7. ALTERNATIVE OPTIONS

- 7.1. This report is to inform Members of the key existing strategic drivers that will affect parking policy for the future. The public health agenda, the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality and

demand for kerbside space form the backdrop of the policy direction set out in this report.

- 7.2. Key strategic Council plans such as the Health and Wellbeing Strategy, Merton's Air Quality Action Plan, Merton's Local Implementation Plan include visions and interventions, which will help to achieve Key Council goals of improving population health, reducing inequalities between east and west Merton, improving air quality and shifting to more sustainable modes of transport. However, they will have limited impact without concurrent changes to parking provision for the future.
- 7.3. This review has looked at a wide range of options to support the above strategic drivers as well as a series of charging options for the future, A lower level of increases, or a 'do nothing' approach would not make any significant contribution towards the Councils strategic objectives. A higher level of increases would, in the view of officers, show insufficient regard for countervailing considerations (such as the need to make provision for those for whom, now, car use remains the only realistic option).
- 7.4. A further option is not to increase charges and accept car ownership and car use will continue to increase the consequent negative impact on air quality and public health. If we do nothing then this will have serious negative consequences on the general health of the local population. Doing nothing is not a recommended option as congestion will increase, we will continue to fail to meet the EU air quality standards and we will not be able to maximise sustainable active travel within the borough.

8. LEGAL AND STATUTORY IMPLICATIONS

Legal and regulatory requirements of Parking and transport management.

Statutory Provisions

- 8.1. The Road Traffic Regulation Act 1984 (s.122) specifies that the functions conferred on local authorities under the Act should be exercised:
"to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway".
- 8.2. This includes (in s.122(1) of the Act)
 - a) The desirability of securing and maintaining reasonable access to premises;
 - b) The effect on the amenities of any locality affected and (without prejudice to the generality of this paragraph) the importance of regulating and restricting the use of roads by heavy commercial

- vehicles, so as to preserve or improve the amenities of the areas through which the roads run;
- c) The strategy prepared under Section 80 of the Environment Act 1995 [National Air Quality Strategy]
 - d) The importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles.
 - e) Any other matters appearing to the local authority to be relevant.
- 8.3. Under Section 45 of the Road Traffic Regulation Act 1984 (RTRA 1984) local authorities may designate parking places and may make charges for vehicles left in a parking place so designated. In exercising its functions under the RTRA 1984, including the setting of charges for parking places, the Council must do so in accordance with Section 122 of the RTRA 1984 above.
- 8.4. In addition s.45(3) of the Act provides that in determining what parking places are to be designated under this section [45] the local authority shall consider both the interests of traffic and those of the owners and occupiers of adjoining property, and in particular the matters to which that authority shall have regard include—
- (a) The need for maintaining the free movement of traffic;
 - (b) The need for maintaining reasonable access to premises; and
 - (c) The extent to which off-street parking accommodation, whether in the open or under cover, is available in the neighbourhood or the provision of such parking accommodation is likely to be encouraged there by the designation of parking places under this section.
- 8.5. In accordance with the council's statutory responsibility under Section 122, the Council must have regard to these relevant considerations in the setting of charges. Setting pricing levels on the basis set out in this Report appears to be consistent with the requirements of the Act (provided that countervailing factors are also taken into consideration, as they have been in the present proposals).

Procedure

- 8.6. Under Section 35C and 46A of the Road Traffic Regulation Act 1984, a Local Authority has powers to vary off and on-street parking charges respectively. The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 contains the order making procedures as well as those to be followed when varying charges by way of a 'notice of variation'.
- 8.7. In this case, the Council decided to undertake a full TMO amendment procedure (rather than a Variation procedure) to enable a comprehensive and

detailed consultation process, as described in the article published by the Council in 'MyMerton'

8.8. Regulation 25 (in addition to requiring the publication in local newspaper) also requires the following:

- (a) For off-street parking, the local authority is required to display in the parking place a copy of the 'notice of variation' and take all reasonable steps to ensure it continues to be displayed in a legible condition (from the date of giving notice until it comes into force); and, if appropriate additional copies are to be displayed within the parking place and in roads giving access to the parking place; and
- (b) For on-street parking, the local authority may, if it thinks fit, display copies of the notice of variation in prominent positions in the road affected.

Fiscal Implications

8.9. The Road Traffic Regulation Act 1984 is not a fiscal or revenue-raising statute. In *Djanogly v Westminster City Council* [2011] RTR 9, Lord Justice Pitchford, in the Administrative Court, held that:

"In my view, when designating and charging for parking places the authority should be governed solely by the s.122 purpose. There is in s.45 no statutory purpose specifically identified for charging. Charging may be justified provided it is aimed at the fulfilment of the statutory purposes which are identified in s.122 (compendiously referred to by the parties as "traffic management purposes"). Such purposes may include but are not limited to, the cost of provision of on-street and off-street parking, the cost of enforcement, the need to "restrain" competition for on-street parking, encouraging vehicles off-street, securing an appropriate balance between different classes of vehicles and users, and selecting charges which reflect periods of high demand. What the authority may not do is introduce charging and charging levels for the purpose, primary or secondary, of raising s.55(4) revenue."

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

Application of Revenue

8.11. In terms of any income that may be generated by the increased charges, the Traffic Management Act 2004 amends section 55 (4) of the Road Traffic Regulation Act 1984 and directs that income should be used:

- (a) To make good any payment used for parking places,
- (b) For the provision of or maintenance of off street parking (whether in the

Open or not) and

(c) *Where off street parking provision is unnecessary or undesirable:*

(i) To meet the costs of provision of or operation of public passenger transport services, or

(ii) For highway or road improvement projects within the borough, or

(iii) For meeting costs incurred by the authority in respect of the maintenance of roads maintained at the public expense by them,

Or

(iv) For the purposes of environmental improvement in the local authority's area, or

(v) Any other purposes for which the authority may lawfully incur expenditure.

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

8.13. However, for the reasons set out above Members must disregard any benefit in terms of the revenue that may be generated by these proposals when making the decision as to whether to proceed or not.

Decision-making: Public Sector Equality Duty (PSED)

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

(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this act;

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

(c) foster good relations between persons who share a relevant characteristic and persons who do not share it.

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

8.15. The characteristics protected by the Act are:

a. age;

b. disability;

- c. gender reassignment;
- d. marriage and civil partnership;
- e. pregnancy and maternity;
- f. race;
- g. religion and belief;
- h. sex; and
- i. sexual orientation

- 8.16. Due regard means that the duty has been considered 'substance, with rigour, and with an open mind' and requires a proper and conscientious focus on the statutory criteria.
- 8.17. The PSED is a duty to have due regard to the specified issues, and not to achieve a particular outcome.
- 8.18. Members should have due regard to the Council's Equality Impact Assessment which accompanies this Report.

Decision-making - General Principles of Public Law

- 8.19. In considering his Report and coming to their decision, Members should ensure that the decision is one which is rational in public law terms.
- 8.20. This requires that Members carefully consider all relevant information, and disregard any information which is irrelevant, and so the proposed policy, the reasons for the proposed charging scheme and pricing should be considered with regard to the statutory purposes of the Road Traffic Regulation Act set out above.

Duty to give conscientious consideration to the consultation results

- 8.21. The Courts have held that a consultation should meet the following standards:
- Consultation must be at a formative stage
 - Sufficient information should have been provided to ensure consultees are able to provide a full response
 - Sufficient time for response should be allowed, and
 - Members should conscientiously take the consultation responses into account

Modifications and Post-decision process for making the proposed Orders

- 8.22. The draft Cabinet report recommends that the TMOs be made with the following modifications:-
- 8.22.1. the permit increase for certain permits in controlled parking zones VNE, VNS, VN, VQ, VSW, VSW1 and VSW2 will be lower than that first proposed and are modified by:-
- (a) For example reducing the cost of the annual visitor permits in VSW1 from £360 to £320; which is a percentage reduction of 11.1%;
 - (b) For example reducing the cost of annual resident permits in VN from £120 to £110, which is a percentage reduction of 9.1%.
- 8.23. For example the overnight parking charges in the Queens Road and St Georges Road Car Park will be amended to a flat fee of £2, instead of £3.
- 8.24. For example the price for season tickets at the Morden Car Parks will be reduced by 6.7% or less.
- 8.25. Before the TMOs are made with modifications the Council is required to consider whether or not the modifications amount to a substantial change in the orders.
- 8.26. If the modifications are regarded as making a substantial change in the orders the Council is required to take the following steps:
- (a) inform persons likely to be affected by the modifications;
 - (b) give those persons an opportunity to make representations; and
 - (c) ensure any such representations are duly considered.
- 8.27. It is considered that these reductions in parking charges are not substantial either in themselves nor having regard to the entire scope of the proposed TMOs.
- 8.28. If Cabinet agree with the officer recommendation that the proposed modifications do not appear to make a substantial change in the TMOs, the orders can be made without further consultation described in paragraph 9.26 above.
- 8.29. The process would be as follows:-
- (a) choose a date to make the TMOs and an operational date for the Orders.
Orders once made are subject to a statutory 6 week judicial review period during which applications can be made to the High Court by persons wishing to question the validity of the Orders on the grounds that they are not within the powers of the Road Traffic Regulation Act 1984 or that the appropriate statutory procedures have not been complied with.
It would be prudent that the new charges come into force after this 6 week period has expired to avoid unnecessary costs that might be

incurred delaying the implementation of the TMOs should a legal challenge be made against the Orders in the High Court.

Please note that the publication of the notice of making the TMOs is not an invitation to make further representations.

- (b) e-mail or write to all Cllrs and associations confirming that the Orders are to be made.
 - (c) within 14 days of making the Orders publish a notice of making in the local press and write to/email all persons/organisations who have made representations to notify them of the making of the Order and where persons have objected to the proposals and the objection(s) have not been wholly acceded to, include the reasons for the decision to make the Order.
 - (d) remove the notices of proposal displayed on site and replace with notices of making.
 - (e) deposit the notice of making and the made Orders at the Civic Centre and at all local libraries for a period of 6 weeks.
 - (f) the Orders would come into force after the 6 weeks legal challenge period.
 - (g) remove the on-site notices of making.
- 8.30. The process of making and implementing the TMOs will likely take up to 8 weeks from the date of final decision.

9. CONSULTATION PROCESS

- 9.1. Merton is committed to undertaking comprehensive consultation to gain the views of residents and stakeholders. This enables the Council to make informed decisions and to develop our policies.
- 9.2. The Parking Charges consultation commenced on Friday 29th March and ended Sunday 5th May 2019. As this consultation formed part of a statutory consultation process, there were a number of legal obligations, as well as a commitment to bringing the proposals to as wide an audience as possible.
- 9.3. To ensure the council could generate as much feedback as possible, representations were invited in writing via the web page, or by email to a dedicated email box.
- 9.4. In addition, an online survey was available which asked prescribed questions and tick box responses, which were recorded. The response options to each question were Strongly Agree, Agree, or disagree, disagree and strongly disagree and do not know. The questions asked along with the responses are shown in Appendices 1, 2 & 3.
- 9.5. Circa 3,000 representations were received.

- 9.6. The Council published a 2-page feature article in My Merton, which was delivered to every household within the borough in March/April 2019 to align with the consultation period.

As well as the online consultation and the My Merton article the council also:

- Attended Community Forum meetings during the period of the consultation
 - Followed the statutory TMO process of displaying notices in roads within all of the CPZ areas, on pay, display machines, and in all council owned car parks.
 - A statutory notice placed in the newspaper
 - Copies of all proposals and background papers were made available on deposit at all libraries and at the Civic Centre for public inspection/reference.
 - Consulted with statutory and non-statutory consultees
 - On the council's home page, we displayed a link to the consultation web pages. The web pages gave full details of the proposal along with background papers and reports. The pages also included a section, which aimed to address frequently asked questions.
- 9.7. A number of statutory bodies were consulted as part of the Traffic Management Order making process. The only response received was from the Metropolitan Police who raised no objections.
- 9.8. Due to the number of responses received, the council extended its review period to the 18th June 2019. This ensured that full consideration was given to all representations, and to allow any further comments from the resident and business associations to be included.

10. HUMAN RIGHTS, EQUALITIES AND COMMUNITY COHESION IMPLICATIONS

The original equalities impact assessment has been updated following the recent consultation process. The revised EIA is attached as Appendix 9

11. CRIME AND DISORDER IMPLICATIONS

None

12. RISK MANAGEMENT AND HEALTH AND SAFETY IMPLICATIONS

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

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

Appendix 1	Online survey - Consultation Results
Appendix 1a	Online survey – Geographic image
Appendix 2	Responses from Residents association and organisations
Appendix 3	Council response to representations.
Appendix 4	Street Charges Map
Appendix 4a	Plan of On street charging zones for Wimbledon Town Centre
Appendix 5	Public Transport Accessibility Levels. (PTAL)
Appendix 6	Map of CPZ zones
Appendix 7a – 7f	Revised parking charges schedule.
Appendix 8	Benefits of walking and cycling.
Appendix 9	Equalities Impact Assessment.

BACKGROUND PAPERS

- **London Borough of Merton’s Air Quality Action Plan 2018-2023**, available here: <https://www2.merton.gov.uk/Merton%20AQAP%2020182023.pdf>
- **Annual Public Health Report 2017-18**, available here: <https://www2.merton.gov.uk/health-social-care/publichealth/annualpublichealthreport.htm>
- **Merton’s Health and Wellbeing Strategy 2015-2018** (please note this is currently being refreshed), available here: <https://www2.merton.gov.uk/merton-health-and-wellbeing-strategy-web.pdf>
- **Mayor’s Transport Strategy 2018**, available here: <https://www.london.gov.uk/sites/default/files/mayors-transport-strategy-2018.pdf>
- **Mayor’s Health Inequalities Strategy 2018**, available here: https://www.london.gov.uk/sites/default/files/health_strategy_2018_low_res_fa1.pdf
- **‘Benefits of Parking Management in London August 2018’**. <https://www.londoncouncils.gov.uk/node/34485>
- **Commission on Climate Change Report. May 2109** <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/>

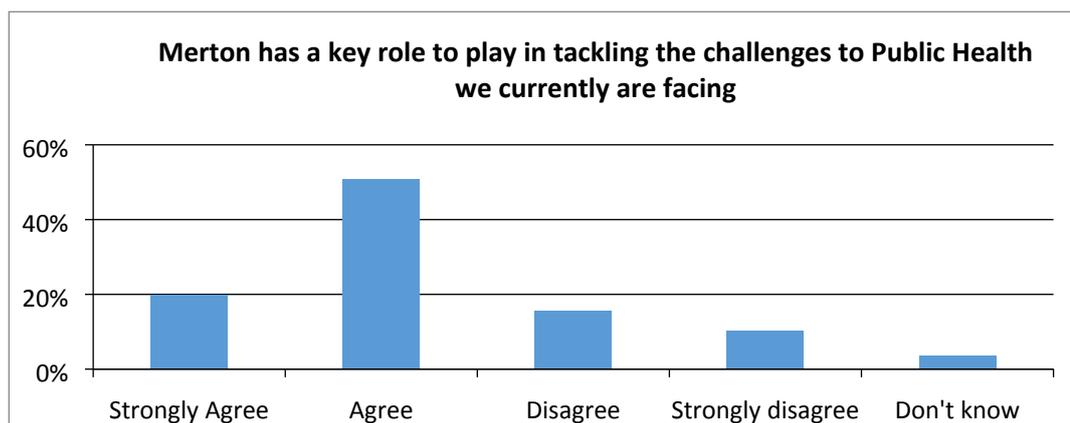
Parking charges survey detailed analysis

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

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

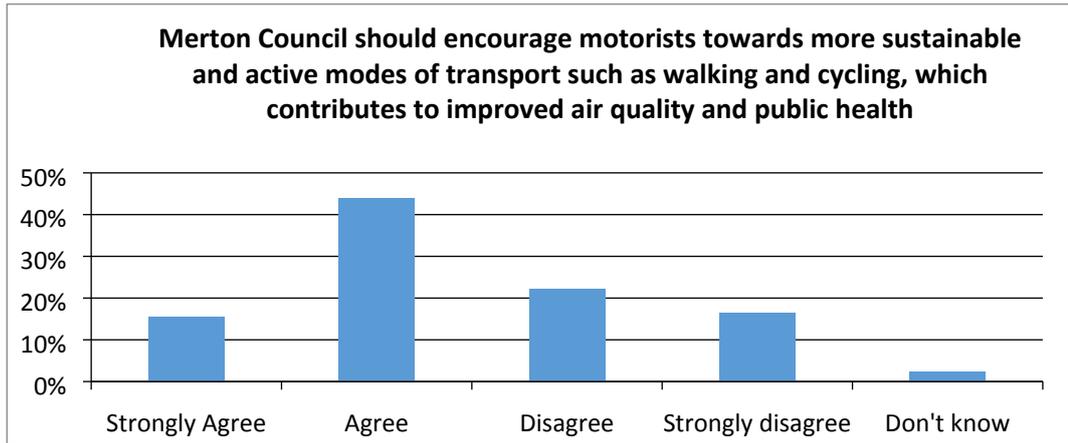
Q1 PUBLIC HEALTH & AIR QUALITY

Nearly three quarters (71%) of respondents agreed with the statement that Merton has a key role to play in tackling the challenges to public health we currently are facing with 26% disagreeing and 4% do not know. Non-car owners were more likely to agree (76%), whilst disabled respondents were less likely to agree (57%).



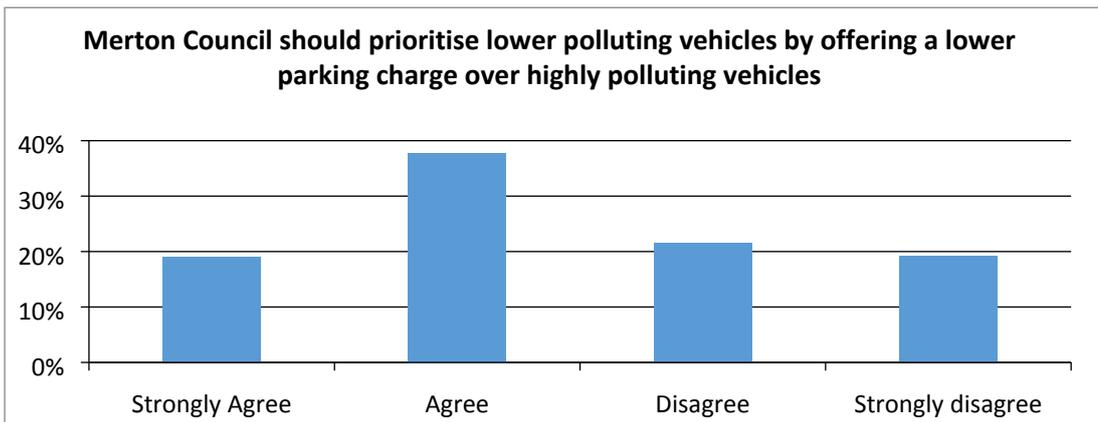
Should Merton encourage active travel and use of public transport?

Just over half (60%) agreed that Merton Council should encourage motorists towards more sustainable and active modes of transport such as walking and cycling, which contributes to improved air quality and public health with 38% disagreeing. Non-car owners were much more likely to agree (73%) as were Asian respondents (70%). Disabled respondents were less likely to agree (49%).



Prioritising vehicle type.

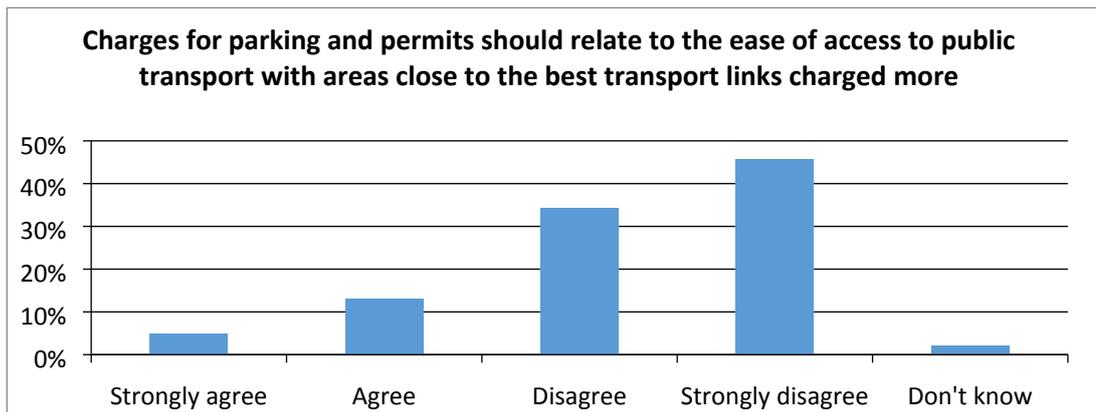
A similar proportion (57%) agreed that Merton Council should prioritise lower polluting vehicles by offering a lower parking charge over highly polluting vehicles. Again non-car owners were much more likely to agree (72%) as were older people with 61% of 66-75 year olds and 80% of over 76 year olds agreeing.



Q2 TRANSPORT MANAGEMENT

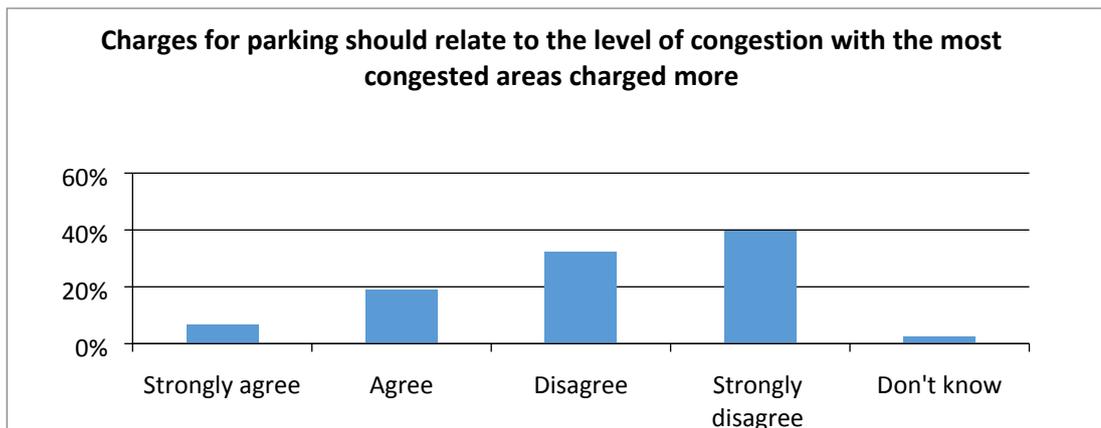
PTAL rationale for Permits and On Street Parking

Four-fifths (80%) disagreed that charges for parking and permits should relate to the ease of access to public transport with only 18% agreeing. Non-car owners were less likely to disagree (64%) and more likely to agree (34%). 36-35 year olds were more likely to disagree (85%) include 54% who strongly disagreed.



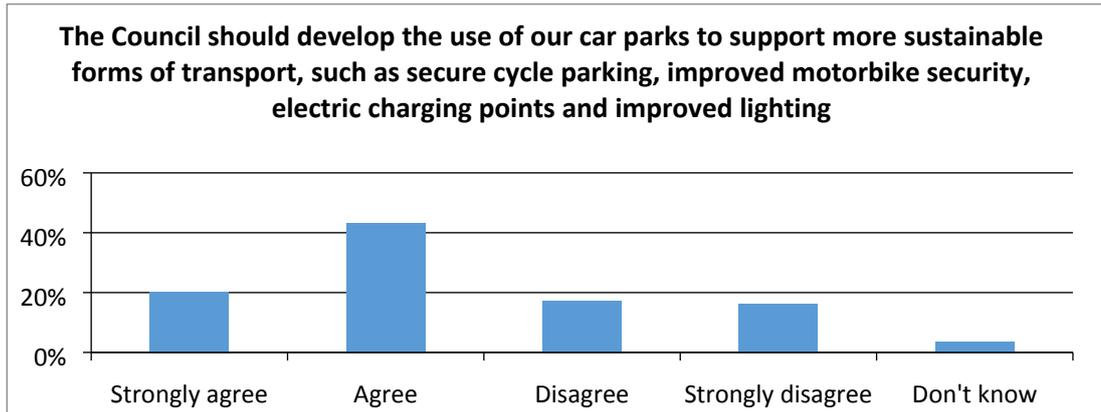
Charges relating to levels of congestion

Nearly three-quarters (72%) of respondents disagreed that charges for parking should relate to the level of congestion with the most congested areas charged more whilst a quarter (26%) agreed. Non-car owners were less likely to disagree (52%) and more likely to agree (45%). Those who work in Merton were more likely to disagree (77%).



Should Merton develop the use of car parks?

Nearly two-thirds (63%) agreed that the Council should develop the use of our car parks to support more sustainable forms of transport with 33% disagreeing. Non-car owners were more likely to agree (72%), where as those who work in Merton were less likely to agree 57% as were disabled respondents (47%).



Q3 CAR PARK SEASON TICKETS

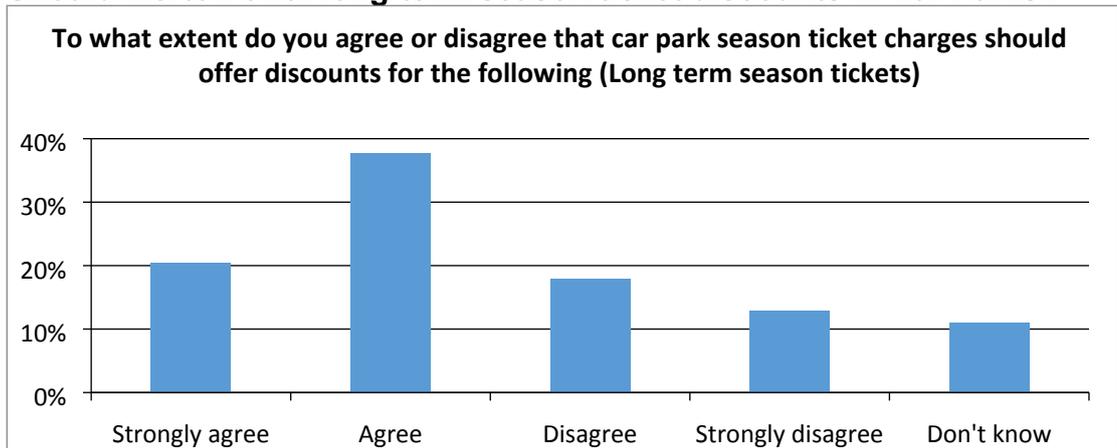
Responders were asked if they agreed that discounts for car park season tickets should be available to the following groups:

- Longer term season tickets
- Electric vehicles
- Residents

Local workers

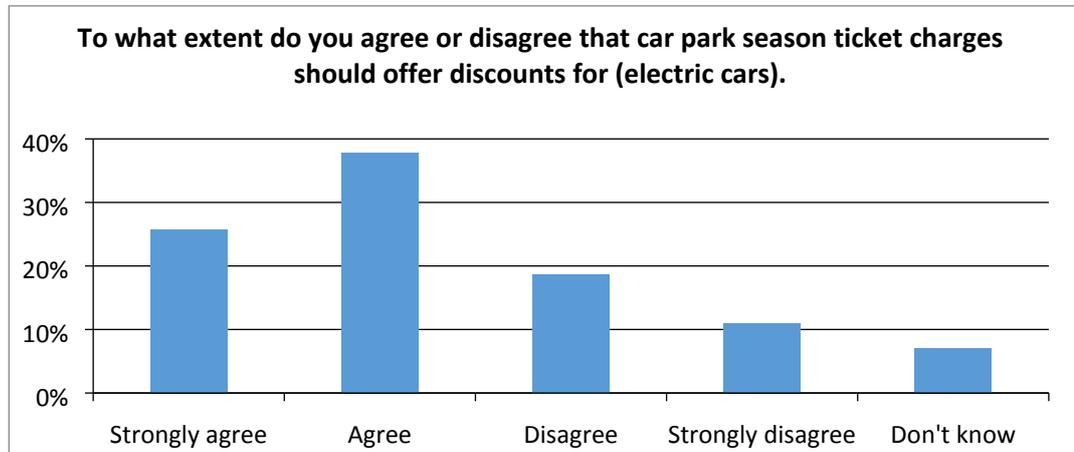
Over half (58%) agreed that discounts should be given to longer-term season tickets with 31% disagreeing. Non-car owners were less likely to agree (48%) and more likely to disagree (42%). Those who working in Merton were more likely to agree (62%), whereas disabled respondents were less likely to agree (52%).

Should Merton offer long-term season ticket discounts in Car Parks?



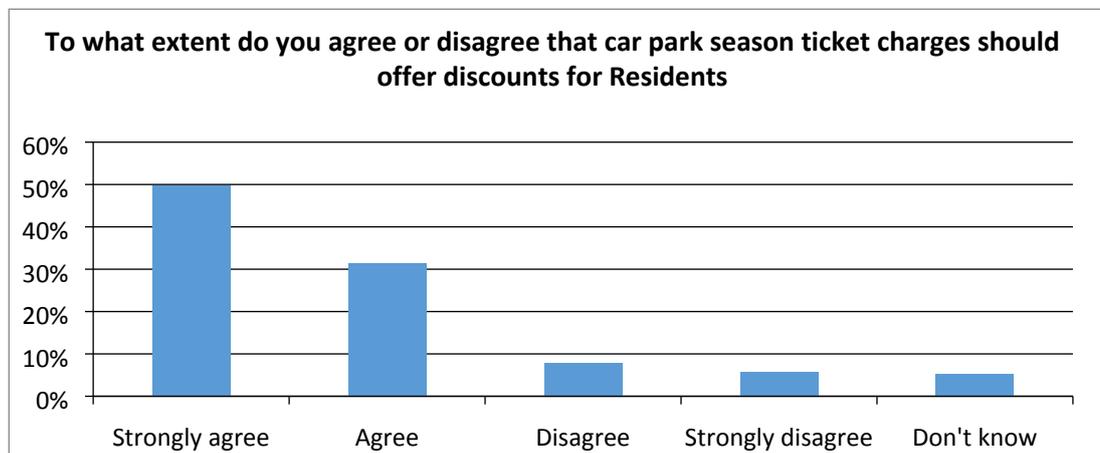
Should Merton offer discounts to Electric vehicles in Car Parks?

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



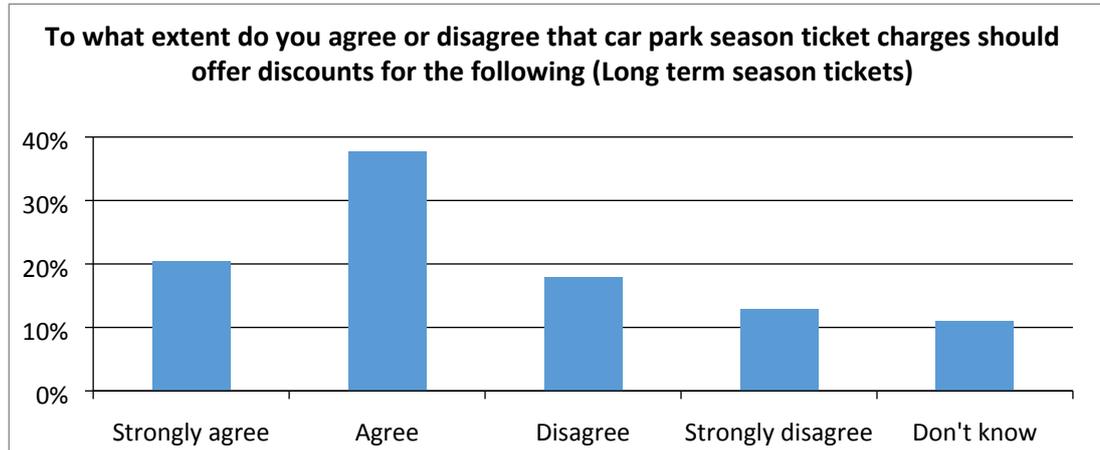
To what extent do you agree or disagree that car park season ticket charges should offer discounts for residents?

More than three-quarters of respondents (81%) agreed that residents should receive a discount on season tickets. Non-car owners were less likely to agree (76%).

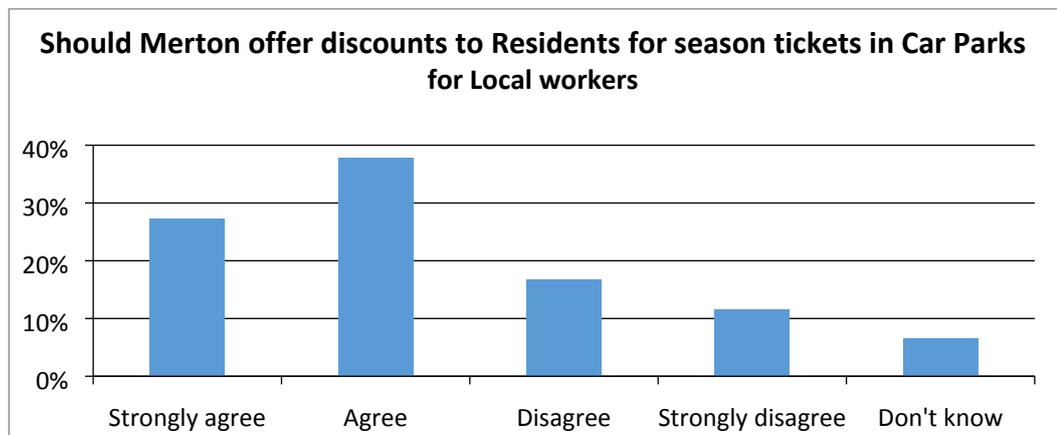


To what extent do you agree or disagree that car park season ticket charges should offer discounts for the following (Long term season tickets)?

Nearly two thirds of respondents (68%) agreed that local workers should receive a discount on season tickets with 31% disagreeing. Non-car owners were less likely to agree (51%) whereas those who worked in Merton were more likely to agree (71%).



Should Merton offer discounts to Local Workers for season tickets in car parks?

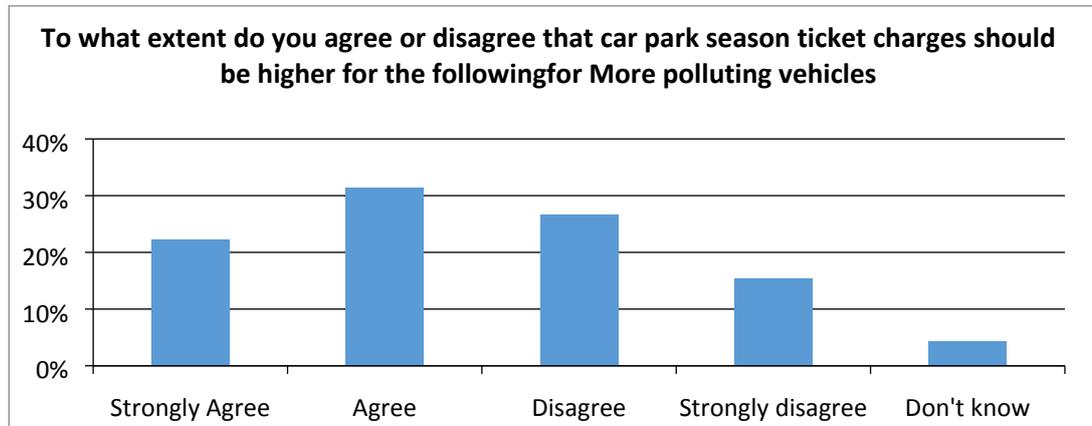


Season ticket holders should be charged more for more polluting vehicles.

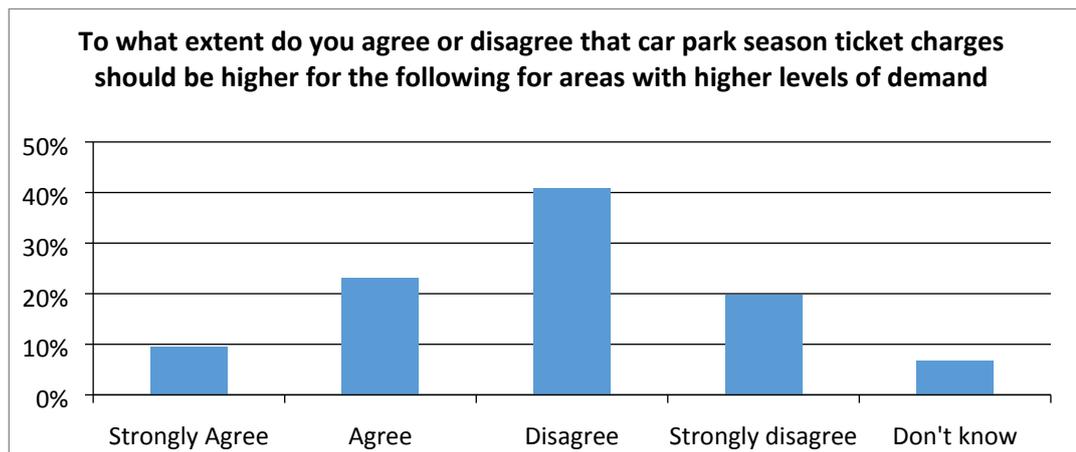
Respondents were asked if they agreed that car park season tickets should be higher for the following groups:

- More polluting vehicles
- Rail heading (those driving into Merton to join the rail network)
- In areas with higher levels of demand

Over half of respondents (53%) agreed that more polluting vehicles should pay more for car park season tickets whilst 42% disagreed. Non-car owners were more likely to agree (68%), whilst those who work in Merton were less likely to agree (48%).



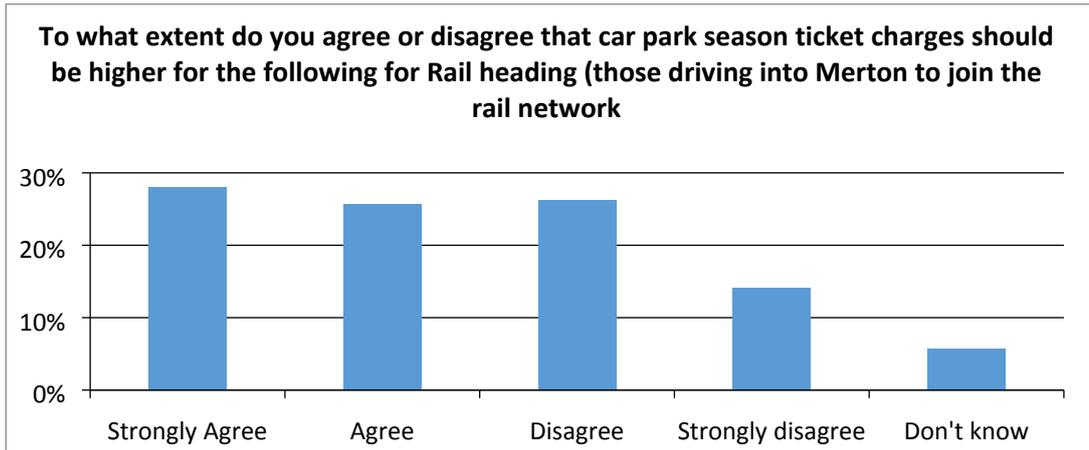
Higher charges for areas with higher levels of demand.



Higher charges for commuter parking

Over half of respondents (54%) agreed that those Rail heading should pay more for car park season tickets whilst 40% disagreed. Those who work in Merton were less likely to disagree (49%) as were those aged 25-36 (47%) and disabled respondents (50%).

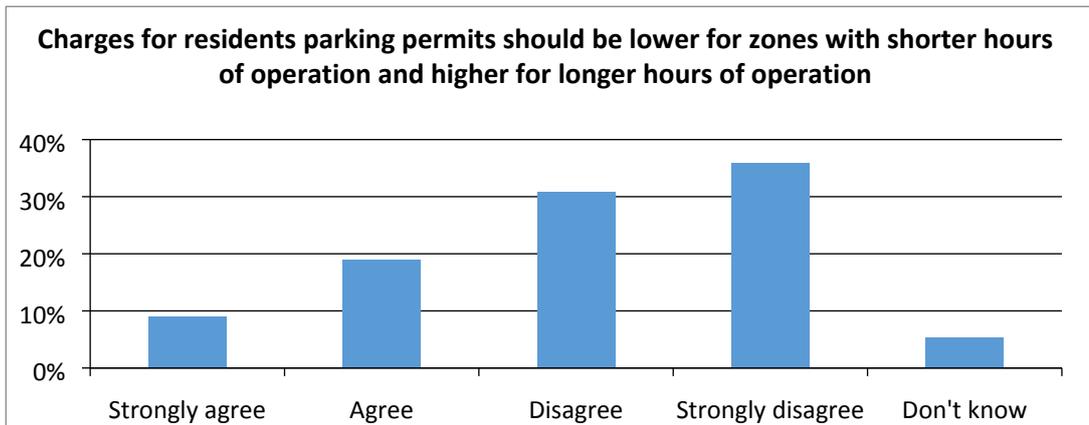
Nearly two-thirds (61%) disagreed that car park season tickets should be higher in areas with higher levels of demand with 33% agreeing. Non-car owners were more likely to agree (40%) and less likely to disagree (50%). Those who work in Merton were more likely to disagree (66%) and disabled respondents were less likely to agree (28%).



Q4 RESIDENT PARKING PERMITS

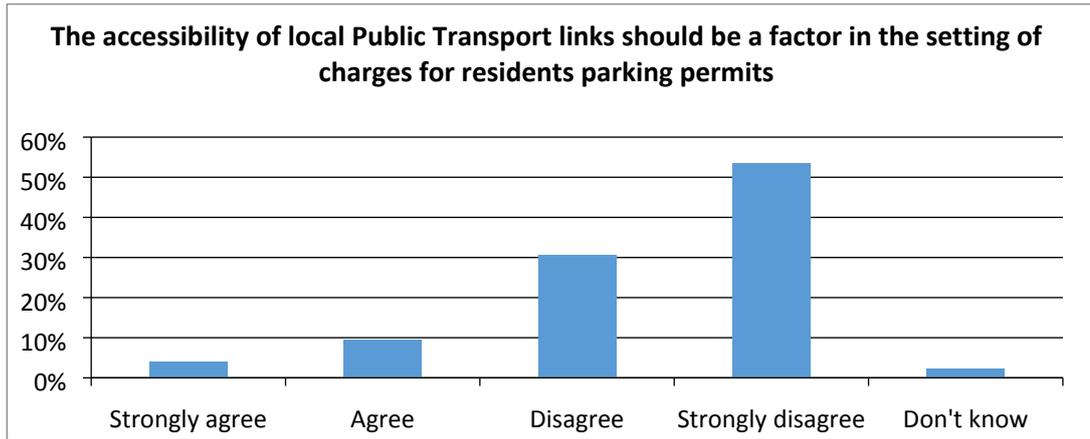
Hours of operation

Two-thirds (67%) of respondents disagreed that charges for residents parking permits should be lower for zones with shorter hours of operation. The level of disagreement was slightly higher (71%) for those who live in controlled parking zones and for those aged 26-35 (72%). Those aged 66-75 (63%) and over 75 (47%) were less likely to disagree.



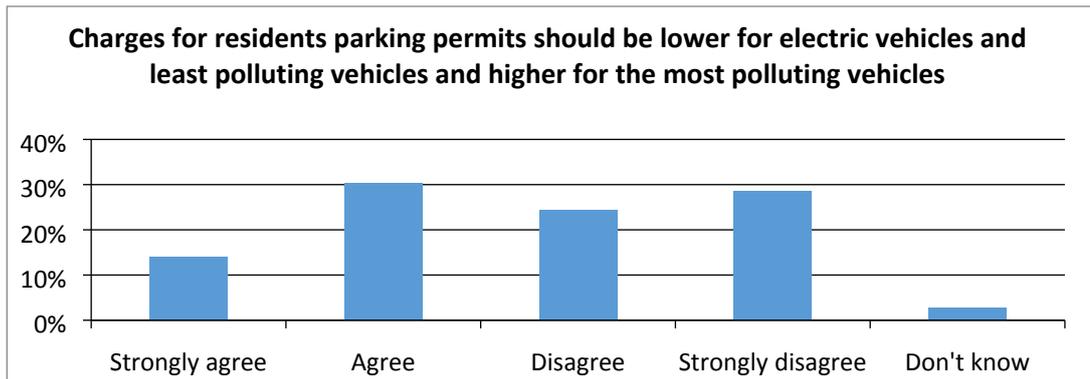
PTAL (Transport accessibility)

The vast majority of respondents (85%) disagreed that the accessibility of local Public Transport links should be a factor in the setting of charges for residents parking permits, with just over half (54%) strongly disagreeing. 14% agreed with the statement. Non-car owners were less likely to disagree (70%) and more likely to agree (28%). Those who live in a controlled parking zone were more likely to disagree (88%) and strongly disagree (58%). Those aged 25-36 were more likely to disagree (88%) whilst those aged over 75 were less likely to do so (63%).



Car Fuel Type

Just over half of respondents (52%) disagreed that charges for residents parking permits should be lower for electric vehicles and least polluting vehicles and higher for the most polluting vehicles whilst 44% agreed with the statement. Non-car owners were more likely to agree (58%) and less likely to disagree (38%). Residents aged 26-35 were more likely to agree (50%) as were those aged over 75 (58%)

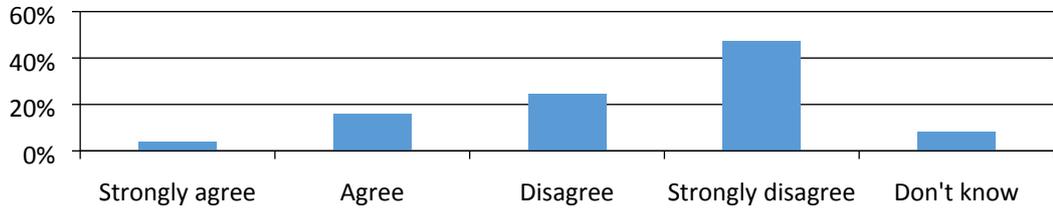


Q5 PROPOSED CHARGES

On Street Parking

Just under three quarters (71%) of respondents disagreed with the proposed charges for on-street parking with 20% agreeing. Non-car owners were more likely to agree (28%) and less likely to disagree (63%). Those who work in Merton were slightly more likely to disagree (74%) as were disabled respondents (78%).

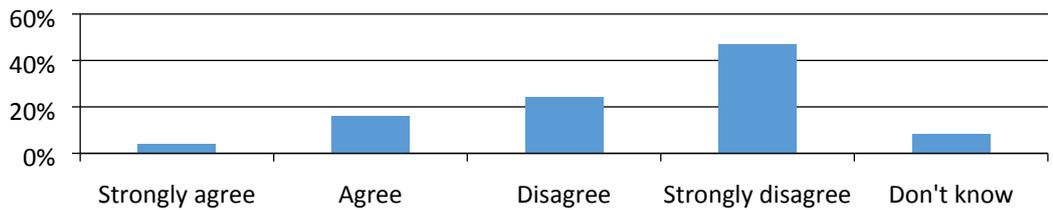
To what extent do you agree or disagree that the proposed charges have been set at a level which will help achieve the objectives to encourage active travel and sustainable transport, and help reduce congestion and air pollution (On Street Parking).



Car Parks

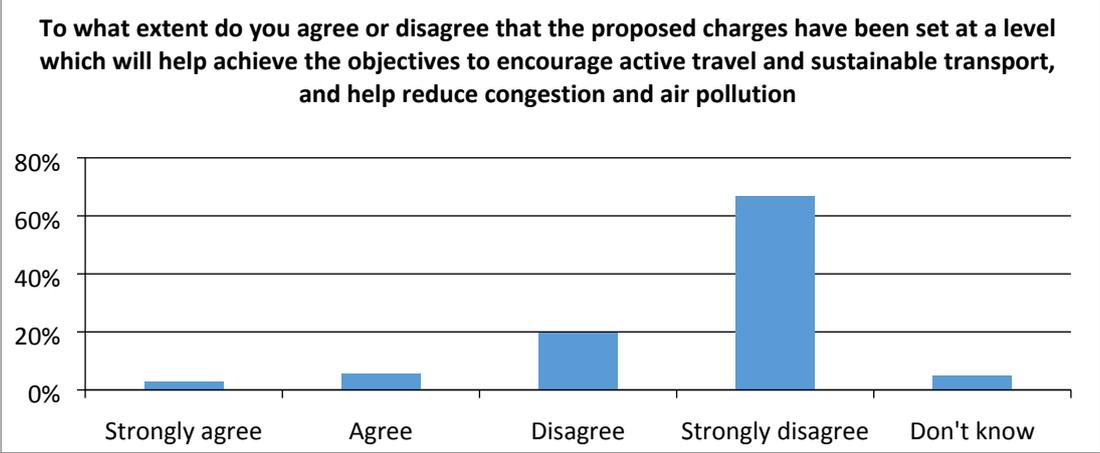
Over half of respondents (56%) disagreed with proposed charges in car parks charges, with 28% agreeing. Those who work in Merton were more likely to disagree (60%) as were disabled respondents (67%).

To what extent do you agree or disagree that the proposed charges have been set at a level which will help achieve the objectives to encourage active travel and sustainable transport, and help reduce congestion and air pollution (On Street Parking).



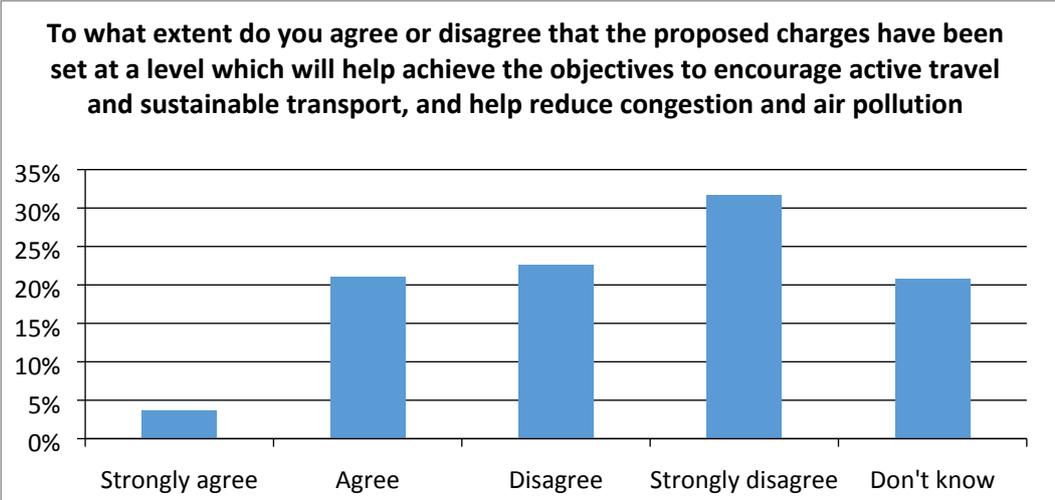
Residents Permits

A large majority (87%) disagreed with proposed charges for resident's permits with two-thirds (67%) strongly disagreeing and only 9% agreeing. Non-car owners were more likely to agree (19%) or disagree (73%). Those who live in controlled parking zones were more likely to disagree (90%) whereas those who work in Merton were less likely to disagree (81%).

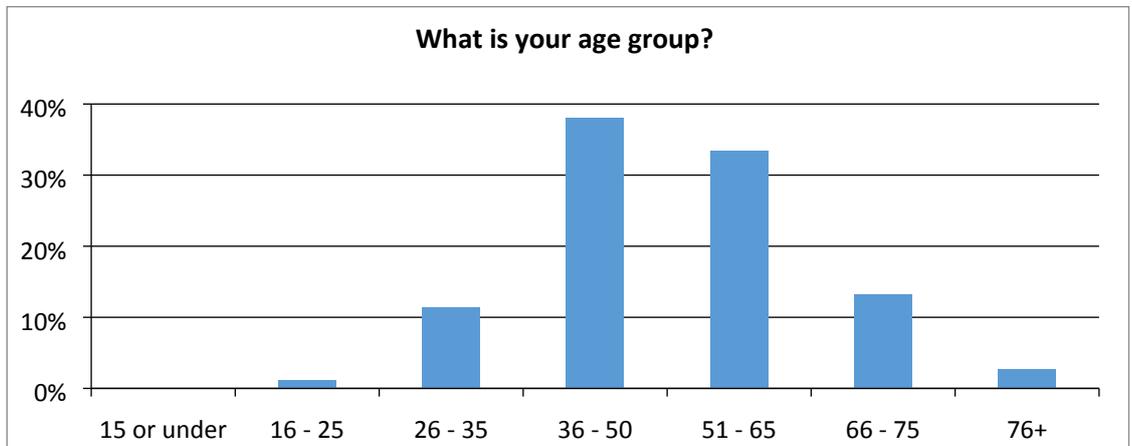
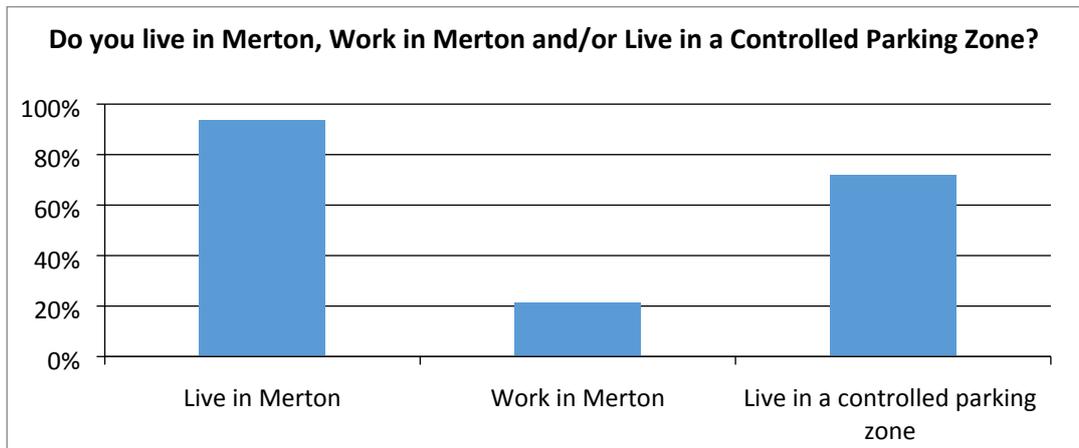
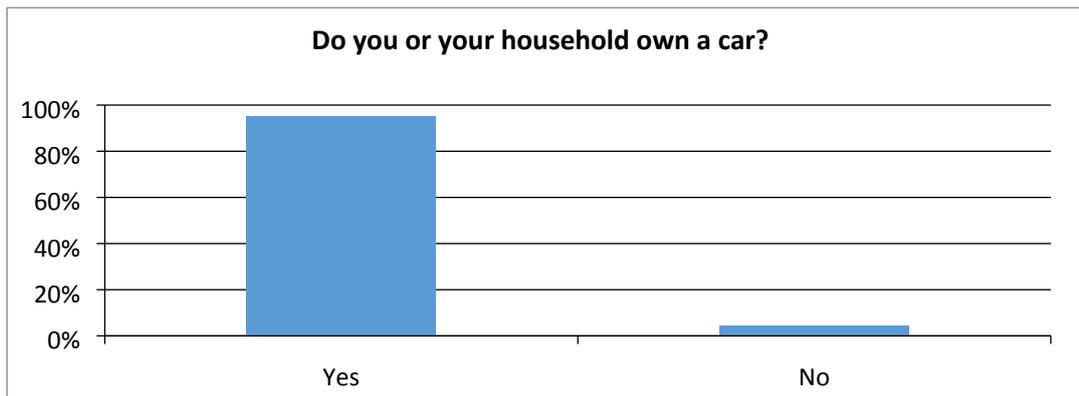


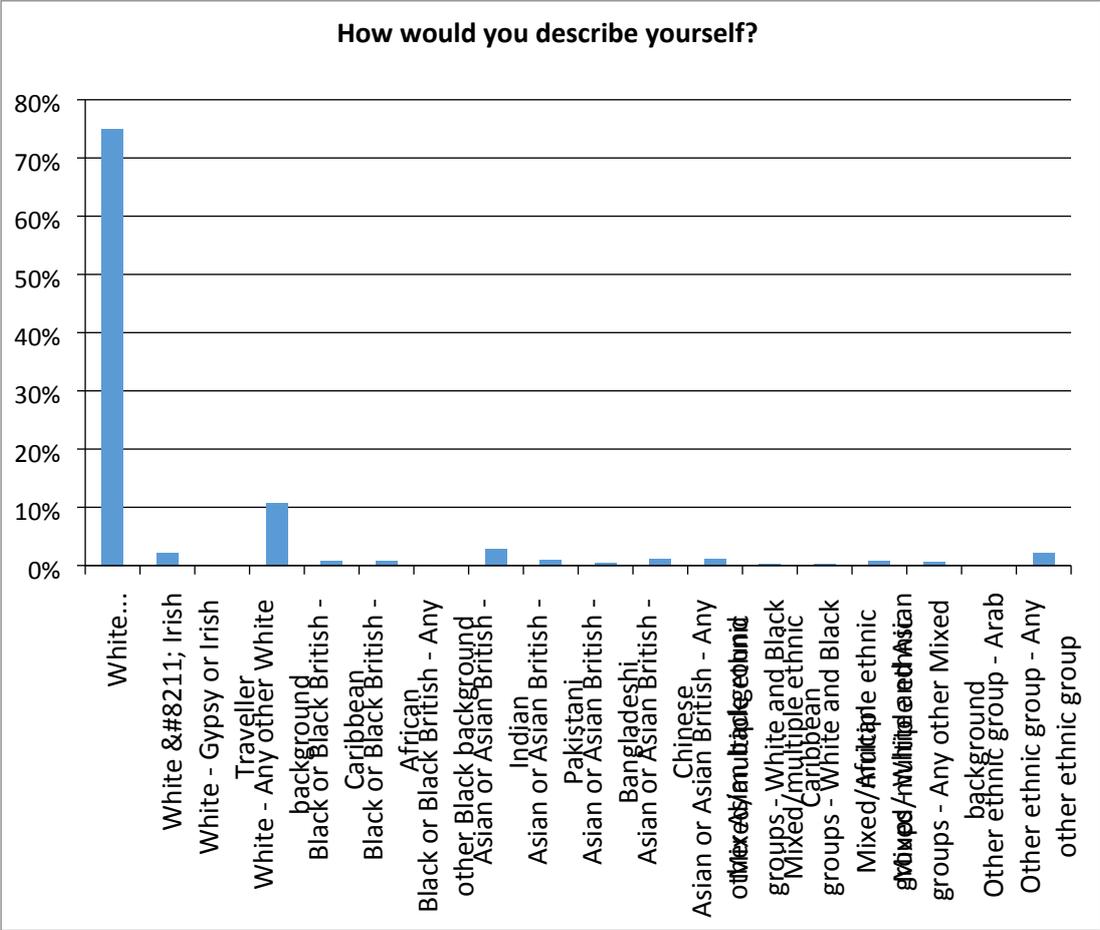
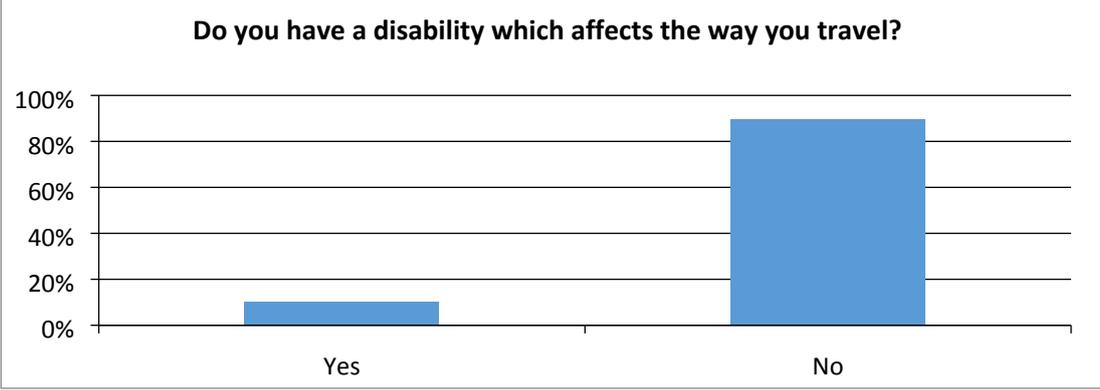
Season Tickets

Just over half of respondents (55%) disagreed with proposed charges for car park season tickets with 25% agreeing and 21% saying they do not know. Those who work in Merton were more likely to disagree (59%), as were disabled respondents (63%).

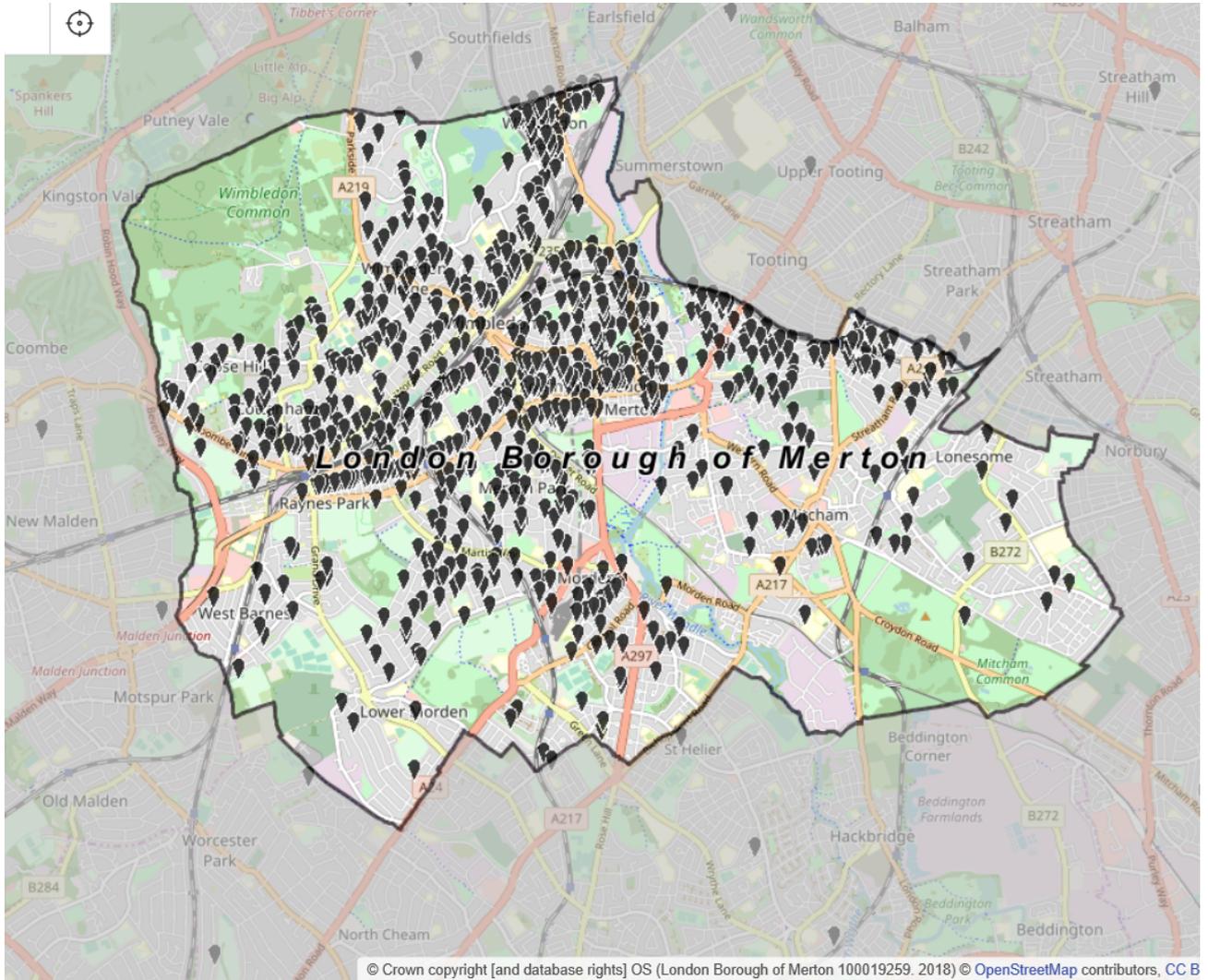


Details of Online Summary - Information about who responded.





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



REPRESENTATIONS FROM STATUTORY BODIES, ORGANISATIONS AND PETITIONS.

MERTON LIBERAL DEMOCRATS

The Liberal Democrats submitted a petition of 1,092 signatures opposing the proposal to increase parking charges. A detailed Representation was also submitted addressing each of the questions within the online survey.

There was agreement that Merton has a key role to play in improving public health, air quality and reducing congestion. Concerns were raised that the policy should be mindful of people who may not easily be able to use public transport / walk / cycle, such as those with mobility issues or young children. They further suggested that support to make the desired change in behaviour, such as scrappage deals, or only applying emissions charges to new permits or renewals, would be more effective.

They questioned the council's approach to the use of PTAL ratings, and believe that the introduction of emissions based charging, a more appropriate policy.

The submission challenges some of the academic findings in the earlier report. They suggested that the council also looked at its own staff parking policies and how parking is provided for their work force.

LOVE WIMBLEDON (BUSINESS IMPROVEMENT DISTRICT)

Fully support improving air quality in Merton and are actively working to assist this objective. They believe there are four key issues that are causing poor air quality such as through traffic, number of diesel buses and taxis often left idling and school traffic.

They are concerned about the impact on our high streets and town centres believing the increased charges will have a negative impact. Car park charges are already high enough and they would like to see evidence of the frequency of cars circling for car parking spaces. They have highlighted that the current car parks require improvements.

In addition, they highlight that the comparative data may be misleading as for example Merton is one of the few boroughs that have restrictions until 11pm, most end at 6.30pm.

Love Wimbledon are very happy to work with Merton and have suggested a number of initiatives where we could work together on in order to improve air quality.

LOCAL FAITH GROUP

A petition has been presented with 184 signatures. The petition stated 'This is going to affect many of our congregation who attend for prayers.

THE WIMBLEDON SOCIETY

The Wimbledon Society supports the objective of improving air quality, particularly in highly populated areas. They believe the objectives could also be achieved by environmental improvements, pedestrian high streets, and reducing traffic from key congested areas.

They are concerned that CPZs were originally set up with a charging scheme that covered all costs associated with the CPZ. Any excess (if produced) would be reinvested for improvements. If there is increased revenue in the future then this must be transparent to residents and accounted for.

Further concerns raised were in relation to the impact on front gardens and shopping areas, particularly small parades etc. They believe that more front gardens will be paved over and suggest that this should be restricted. In addition, to secure no reduction to customers to shops and small parades there should be free 30 minute parking options in order to reduce the impact on local retail establishments.

ST JOHNS AREA RESIDENTS ASSOCIATION.

The Association objects to the proposals because the increased charges are significantly above inflation and are not borough wide. They will have a detrimental financial effect on certain residents/visitors and they believe there is no level of assurance that they offer value for money. In addition, the association would like information regarding how the additional revenue will be spent.

THE WIMBLEDON EAST HILLSIDE RESIDENT ASSOCIATION (WEHRA)

WEHRA fully support the objective of improving air quality. However, they would like more evidence of the problem in order to have a level of reassurance that the proposals adequately address the issues raised.

They are concerned about the number of HGVs around Wimbledon because of a concrete facility in Weir Road. They would also like to be provided with further information about the council's response to the proposed expansion at Heathrow.

They suggest that Merton could help to meet their objectives by improving cycling opportunities in the borough, reviewing planning applications that adversely affect air quality, and by improvements to public transport.

NORTH WEST WIMBLEDON RESIDENTS ASSOCIATION (NWWRA)

NWWRA fully support the objective of improving air quality. However, in order to have a level of reassurance that the proposals address the issues, they have asked for evidence that higher permit charges lead to a reduction in car ownership.

They felt that residents in CPZs with no off street parking, would be unfairly burdened, those in a CPZ for less than a year should not be subject to these increases and some CPZs should be in different PTAL zones. In addition, hybrid vehicles should be recognised and awarded discounts similar to those offered to electric vehicles.

They suggest that Merton Council could help to meet their objectives by stopping idling cars, campaigns to promote alternative transport methods, improvements in public transport and interventions that reduce the number of highly polluting vehicles on the roads in Merton.

SOUTH RIDGWAY RESIDENTS ASSOCIATION

The Association felt that the proposed charges were too high, unfair, did not affect those with a drive or garage and unduly disadvantaged those in a CPZ despite the fact that all motorists contributed to air quality and pollution. In addition, they were concerned that when the original CPZ charges were introduced, they were initially just to cover costs. The new proposals appear to be an additional tax.

They were also concerned about the impact on the high street and retail generally. In conclusion, they felt that charges should be kept as low as possible and were therefore opposed to the proposed increases.

APOSTLES RESIDENT ASSOCIATION

The Association were opposed to the proposed increases as they are too high, did not affect those with a drive or garage and unduly disadvantaged those in a CPZ zone. As such, they feel that the rationale to reduce pollution was not supported. They also raised concerns that the charges when the CPZ was set up; were initially just to cover costs but now appeared to be an additional tax.

Finally, if the proposed charges were to be approved and implemented, then any additional funds generated should be spent on road improvements.

RAYNES PARK RESIDENTS ASSOCIATION

The Association were opposed to the proposed increases as they are too high, did not impact on those with a drive or garage unduly disadvantaged those in a CPZ, despite the fact that all motorists contributed to air quality and pollution. In addition, they were concerned that the charges when the CPZ was set up were initially just to cover costs but now appeared to be an additional tax.

The Association was opposed to the proposed increases with regard to on street parking, because of the impact felt by the retail outlets in the Town Centre.

The Association had requested more free 20-minute parking bays in certain areas within Raynes Park. They felt that the shopping experience within Merton should be supported, rather than being hindered, by increased parking charges.

THE RESIDENTS ASSOCIATION OF WEST WIMBLEDON RAWW

RAWW stated that the proposed increases are not fair for three main reasons:

- The negative impact on local shopkeepers and businesses.
- Housebound residents
- Residents who do not have off street parking, particularly those employed in essential services.

STOP PARKING CHARGES INCREASES!

An anonymous petition with approximately 200 signatures. The text reads. *'The council are proposing to increase the hourly parking charge from £1.20 to £3.00 per hour. This will have a devastating effect on our business, so we are asking you if you will support us opposing these increased charges.'*

STATUTORY CONSULTEES

There was only one response, from the Metropolitan Police, who raised no objections.

PERMIT CHARGES

The sections below addresses the points raised in the consultation.

<p>Permit charge too high & ability to pay</p>	<p>Respondents stated that the proposed permit charges are too high. There were a wide range of reasons recorded, the following are the key reasons:</p> <ul style="list-style-type: none"> - too high an increase - charges being used as a tax - proposed charges are well above inflation - the council tax has already increased significantly so the impact of increased car parking charges is a further financial blow - the proposed increase would not change driver behaviours and car ownership. <p>Many respondents stated that for a variety of reasons, they needed a vehicle and consequently the proposed charges would have a significant impact on their budget.</p> <p>Council response: The proposed charges are seeking to achieve the key policy objectives set out in the report.</p> <p>The council has to strike a balance in achieving its obligation to improve air quality, public health outcomes, management of the highway and sustainable active travel.</p> <p>The council is proposing a range of charges, which will challenge driver choice of travel across the borough, but also make it easier to use public transport and waling/cycling instead of the car.</p> <p>There are very few direct levers available to stimulate driver behaviour, and the council believes the rationale for setting the new parking charges is about giving people the right nudge and opportunity to make the right choices.</p> <p>In setting out its measures of success, the new charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets – to benefit residents and businesses alike.</p> <p>Local authorities are not permitted to use parking charges solely to raise income. When setting charges, we must instead focus on how the charges will contribute to delivering the councils traffic management and other policy objectives.</p>
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<p>Permit charge emission based</p>	<p>We received a high number of comments from respondents suggesting charges should be emission based and reflecting the size of the vehicle. The comments regarding this subject were wide ranging and included the following:</p> <ul style="list-style-type: none"> - There should be direct links made between the vehicle and the contribution to pollution etc. based on their emission. - A number of comments related to the size of the vehicle as there are large disparities and this can be significant re parking bay usage. <p>Overall respondents felt that the owners of vehicles contributing the most to pollution should pay the most, rather than a standard charge for all diesel or petrol resident permits.</p> <p>Council response: The council acknowledges these views and is currently undertaking a review of emission based charging. The report will be presented to Cabinet later in the year and all the comments received in this consultation will be considered as part of this review.</p>
<p>Cheaper first permit</p>	<p>A small number of respondents stated that they felt the first permit in each household should be free or a lot cheaper.</p> <p>Council response: Charges have been considered and set at levels, that will challenge driver behaviour and choice with the aim of reducing car use and ownership. The council is mindful of economic challenges facing many residents and visitors to the borough, but also needs to meet obligations to reduce poor levels of air quality and improve public health, increase cycling, walking and use of public transport. There have been no increases to parking charges for several years.</p> <p>The new charges are considered a reasonable amount to nudge residents and visitors to consider their car use and alternative travel choices.</p>
<p>Permit charge should be a borough wide charge</p> <p>Only penalising those in CPZs</p>	<p>A number of respondents stated that the charges should be borough wide. Respondents felt that all CPZ residents permit charges should be the same, rather than the charges based on location/CPZ and the period of the controlled parking.</p> <p>A number of respondents commented that the proposals are only penalising those that reside within CPZs although all motorists within the borough contribute to the poor air quality, congestion etc.</p> <p>Council response: The council acknowledges that there are differences in the proposed charges. The PTAL ratings and the period of the controlled parking is the basis for the proposed permit charges with the objective of encouraging motorists to use alternatives such as public transport. The charge reflects the ease of the option to use for example, public transport and/or the demand within the CPZ for parking.</p>
<p>PTAL supported</p>	<p>We received a limited number of comments supporting the PTAL basis of our proposal. Respondents agreed that certain areas in Merton are well served by public transport and understood/supported PTAL. Because of other comments,</p>

	<p>received regarding PTAL we have reviewed the proposed tiers based on PTAL CPZs to reflect the ratings.</p> <p>Council response: The Council acknowledges this support by a number of respondents.</p>
<p>PTAL not supported</p>	<p>There were a number of respondents stating that they did not support PTAL. The main reasons for not supporting PTAL are as follows:</p> <ul style="list-style-type: none"> - Public transport is not a substitute for all vehicle journeys - Residents stated they already pay a premium to live near good transport links and use them as much as the can but public transport does not meet every journey need. - Living near public transport does not mean it is easily accessible for all – lack of lifts, escalators, etc. not user friendly for families, those needing to carry goods/buggies or with mobility problems. <p>A key theme was those that live near public transport use their cars less because of the links; but still need a car for those journeys that public transport does not cover.</p> <p>Council response: There is a significant difference in transport infrastructure and accessibility dependent on where a resident lives, visits or works within the Borough. This is presented in the form of a ‘Public Transport Accessibility Levels’ (PTAL) as set out by TfL and formed part of the review. TfL have grading’s for each area of London – ranging from the highest to the lowest.</p> <p>It is therefore easier in principle for a person living, visiting or commuting to a high PTAL rated area to use alternative sustainable of transport, compared to residents in low PTAL rated areas.</p> <p>It should be noted many existing and new developments in high PTAL rated areas are already car free and a Permit might not be purchased, and this forms part of the current planning process.</p> <p>A recent Residents Survey highlighted public transport provision throughout the borough as most valued by residents.</p> <p>Merton is very well connected to the public transport network with 10 mainline rail stations served by Thameslink (Wimbledon Loop), South Western Railway and Southern Rail services. A network of 28 bus routes also serves the borough; including 7 night buses, several of which run 24hrs a day.</p> <p>Wimbledon Station serves as a sub-regional transport hub and is served by National Rail train services (South Western mainline), London Underground (District Line), London Trams and bus services. The suburban station at Mitcham Eastfields puts the east of the borough within 25 minutes of central London (Victoria and Blackfriars).</p> <p>The Northern London Underground line also runs through the borough and terminates at Morden, (including night-time service, which runs on Fridays and Saturdays every 8 minutes between Morden and Camden Town and</p>

	<p>approximately every 15 minutes from Camden Town to High Barnet and Edgware).</p> <p>Following the consultation process, the council has reviewed the PTAL rating for each CPZ and walking distances to main line, tram and underground stations access, and it is recommended that Controlled Parking Zones VNE, VNS, VN, VQ, VSW, VSW1, VSW2, be re-categorised as Tier 2 from Tier 1. as shown in Appendices 7, 7a, 7b and 7c.</p>
2nd & 3rd Higher charge	<p>We received a number of comments in relation to the cost/charge for the 2nd, 3rd, plus, resident permit. The respondents felt that one vehicle per address was reasonable but multiple vehicle ownership had a significant impact on all residents at a given area/CPZ. Multiple vehicle ownership creates a higher demand on the supply of available parking bays within a given address/CPZ often causing difficulties in finding a parking bay near to where the vehicle owner resides. Consequently, the respondents felt that if the second third fourth etc. resident permit significantly increased in cost this would deter multiple vehicle ownership unless essential.</p> <p>Council response: The council has reviewed the above response, notes the support and has decided to progress with the current proposed charges for second, third and fourth resident permits.</p>
Too low	<p>There were a number of comments received from respondents recording their views that they felt the cost of resident permits were too low. These respondents felt that the resident permits despite the increases, were still too low in order to achieve the objectives in the proposed policy.</p> <p>Council response: The council notes the support for its proposed charges. Once they are implemented, the council will monitor their effectiveness.</p>
Annual Visitor Permit	<p>We received comments regarding the annual visitor proposal. The comments raised concerns about the proposed increase to the annual visitor permit.</p> <p>The respondents indicated that they have currently purchased the permit for their use (particularly if they own or have access to a variety of vehicles), personal visitors, visiting tradespeople and on occasion staff such as nannies, carers etc. The respondents felt that the proposed increase is too high.</p> <p>Council response: The proposed annual visitor permit is charged at a premium because of the flexibility it offers by not being vehicle specific hence the limit of one per address. It should be noted that the council acknowledges that for certain residents this permit is not the ideal permit and they have options as part of the amendments following consultation as follows:</p> <ul style="list-style-type: none"> - Where the current annual visitor permit is used for and by carers; they will be able (if eligibility met) to apply for a Blue Badge. - In certain cases, it may be more financially feasible for residents with current annual visitor permits to move to visitor permits (half day or full

	day) if used for ad hoc visitor or tradespeople.
Limit the number of permits per address	<p>A number of respondents stated the issue of resident permits should be limited. The respondents felt that one vehicle per address was reasonable but multiple vehicle ownership had a significant impact on all residents at a given address. Multiple vehicle ownership creates a higher demand on the supply of available parking bays within a given address/CPZ often causing difficulties in finding a parking bay near to where the vehicle owner resides. Consequently, restricting the number of permits issued to any address would reduce the demand on parking bays.</p> <p>Council response: The current proposal does not include limiting the number of resident permits per address, but does include charging more for each resident permit purchased.</p>

Charging Rationale

<p>Does not address the issue of air quality</p>	<p>A number of Respondents stated that they felt the proposals would not address the issue of improving air quality. They made a variety of suggestions as to other factors that had an impact on air quality opposed to car use.</p> <p>Council response:</p> <p>The London Borough of Merton historically and presently, continues to exceed targets and its legal objectives for local air pollution, including Nitrogen Dioxide (NO₂). The Government, local authorities and policy makers are being continuously challenged around delivering their responsibilities to reduce pollution, and are often criticised for lack of action or being slow to respond.</p> <p>Air quality has been identified as a priority both nationally and within London, where pollution levels continue to exceed both EU limit values and UK air quality standards. Pollution concentrations in Merton continue to breach the legally binding air quality limits for both Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀). The air quality-monitoring network, run by Merton, has shown that the UK annual mean NO₂ objective (40µg/m³) continues to be breached at a number of locations across the borough including Colliers Wood, Morden, Tooting and South Wimbledon. In some locations, the NO₂ concentration is also in excess of the UK 1-hour air quality objective, which indicates a risk not only to people living in that area but also for those working or visiting the area. Reducing vehicle numbers (car usage) and different types of vehicle has a direct and tangible benefit on air quality.</p> <p>In Merton, an Air Quality Management Area (AQMA) has been declared for the whole Borough with four locations identified as having high levels of pollution and human exposure. These are in the main centres of Mitcham, Morden, Raynes Park and Wimbledon.</p> <p>Poor air quality in Merton comes from a number of sources, but our legal exceedances are almost entirely due to road transport. Road transport accounts for approximately 60% of emissions of NO₂ in our Borough. Simply put, this is due to traffic including the nature of vehicles on our roads, the volume of vehicles and the number of trips that they take.</p>
<p>Dropped kerb properties unaffected</p>	<p>There were a number of comments received highlighting that residents who have dropped kerbs were not affected by the current system or the proposed changes. Respondents felt that it was unfair that those properties with dropped kerbs and/or other available off street parking such as garages, despite having one or more vehicles would not have to purchase any permits. Consequently, these residents will not be subject to the proposals thereby contributing to the objectives of the proposals.</p>

	<p>Council response: The council notes these points and wishes to address the reliance and use of vehicles across the borough, not just within CPZs. A key reason, why on street and car park charges are also being proposed at the same time, is to deliver a cohesive policy to encourage a change in driver behaviour.</p> <p>Unfortunately, we have very limited powers but do use them when we can. One example is, many existing and new developments in areas close to good public transport provision are already 'car free' and a permit may not be purchased, and this forms part of the current planning process.</p> <p>CPZs are traditionally areas where there are good transport links and have been implemented because of congestion and demand for spaces, often from vehicles from outside the area to access transport. The proposed charges are also calculated on enforcement cost and higher charges have been set to unforce CPZs that have longer hours of operation.</p>
Tier structure / not fair	<p>We received comments stating that the tier structure in the proposal is unfair. The respondents felt that the current proposal was unfair for a number of reasons. The reasons ranged from for example, disparity based on geographical, vehicle, financial, whether in CPZ or not and PTAL ratings. Most respondents felt that the charges should be equal across the borough and not dependent on any particular disparity because all vehicles add to pollution, congestion and therefore air quality.</p> <p>Council response: The council's proposal is based on a number of key factors in order to ensure that the greatest impact is achieved on behaviour where the resident has the best alternatives available. For example, where a resident has access to the best transport links in the borough the permit is more expensive. If the council charged all residents the same price, we would have less leverage on changing behaviour in those areas where there are alternatives available.</p> <p>The council has a duty and responsibility to protect and promote good living conditions throughout the borough they also need to tackle the poor air quality.</p>
Parked cars do no pollute	<p>We received comments stating that parked cars do not pollute. The council understands this view, but vehicles are not purchased to never be used; hence, all vehicles are used to varying degrees. It could be argued that the less a vehicle is used the greater the scope to use alternative options such as car club, public transport etc.</p> <p>Council response: No car is bought just to be parked; it is bought to be driven. How often and how far does vary, but it will be driven. The principle of charging based on location to public transport and local amenities is that it is easier to travel without the car on a day-to-day basis, than from locations with poorer access to amenities and public transport.</p>

<p>Negative impact on business</p>	<p>Respondents were concerned about how the proposed charges will affect the high street and retail generally within Merton. In particular, the sole trader running a small retail shop. There is concern that the increased 'on street charges' will result in less visitors to certain areas and as a consequence a reduction in their income.</p> <p>Council response: The council is mindful of these challenges and received written submissions from the business sector, including the Wimbledon Society and Love Wimbledon BID.</p> <p>Merton actively supports all businesses in the borough and works with a number of businesses and organisations in development initiatives.</p> <p>In order to assist businesses and support the nighttime economy, the Council recommends a reduction in charges in the underused car parks of St Georges Road and Queens Road to a flat fee of £2 between 6pm and 11pm.</p> <p>The Council will also continue to continue its commitment to the free twenty-minute bay parking.</p> <p>Research shows that when streets are improved, retail values increase, more retail space is filled and there is a 93% in people walking in the streets, compared to locations that have been improved. The research has also found that people walking, cycling and using public transport spend the most in their local shops, 40 per cent more each month than car drivers do.</p>
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Through Traffic

<p>Congestion traffic flow / traffic management 20mph</p> <p>Through traffic</p> <p>ULEZ (extended congestion charge)</p>	<p>Respondents raised issues regarding the impact of traffic flow, traffic management schemes within the borough including the 20 mile per hour initiative and ULEZ (extended congestion charge). All of these issues the respondents believed also had an impact on air quality within the borough.</p> <p>Council response: Merton Council's transport policies are focused towards mitigating against congestion, car use and road safety through a range of physical and educational measures with a strong emphasis on road safety and encouraging sustainable transport alternatives for short trips.</p> <p>The council will continue to adopt initiatives that will continue to address congestion, air quality and road safety.</p> <p>The Mayor for London has rightly placed growth, healthy people and places as the central theme of his adopted transport strategy. Merton Council is supportive of this strategy and in particular the adoption of healthy street indicators when designing public realm improvements.</p> <p>The Mayor of London's ambition is to make London a zero carbon city by 2050. As a local authority Merton will be following this lead in improving air quality and consider initiatives such as the ULEZ charge which targets older and higher polluting diesel and petrol vehicles. Processes are in place to</p>
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	<p>phase out purchasing of diesel buses; introduce hybrids and electric buses; Retrofit scheme outside central London. As of 2018, all new black taxis must be zero emission capable and given that these vehicles cannot be older than 8 years, the phasing of existing air polluters is inevitable. We are also working with TfL to identify suitable sites Rapid Charging points for taxis.</p> <p>The London Mayor is committed to making London's bus fleet cleaner with all TfL buses expected to be electric or hydrogen by 2037. The council believes that TfL's bus replacement does not go far enough and should be accelerated so that the whole of greater London can enjoy the benefits of cleaner buses much sooner. It will continue to lobby TfL to make buses in Merton cleaner</p>
Address rat runs	<p>Some respondents felt that the 'rat runs' within the borough that added to the congestion issues should be addressed.</p> <p>Council response: There are areas across the borough where motorists rat-run through local streets or cruise streets looking for parking spaces. The council will work with residents to investigate and implement measures to reduce through traffic on local roads, including measures, such as filtered permeability schemes where access is restricted to cyclists only as part of a wider healthy neighbourhood proposal.</p>
ULEZ	<p>Respondents suggested that Merton should implement ULEZ within the borough.</p> <p>Council response: We are currently undertaking a project to consider the use of Clean Air Zones in the borough to tackle through traffic. This commitment forms a part of our Air Quality Action Plan and shows that we are committed to using all the powers we have available to us to tackle transport pollution.</p>

Public Transport

Public transport infrastructure weakness	<p>Respondents recorded comments regarding the public transport infrastructure. There were a wide range of reasons recorded, such as reliability, buses are full in peak hours, and the number of closures over the weekend in particular, strike action, lack of links between key routes and general accessibility issues.</p> <p>Council response: The Council will continue to lobby TfL to improve bus services in areas currently poorly served by public transport to provide a reliable alternative to car ownership and increase access to employment and services. The cost of bus travel in London has been frozen and the Mayor has introduced 'Hopper' tickets allowing passengers to use more than one bus to complete their journey.</p> <p>Transport for London continues to explore options for increasing public transport capacity across the capital, including potential extension to the</p>
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	<p>tram network in Merton (Sutton Link) and other capacity enhancements to the underground network, all of which are supported by the council.</p> <p>The council works closely with TfL and Network Rail in ensuring that the highway infrastructure accommodates the efficiency of the public transport services. This include accessibility; bus stops, bus shelters; countdowns etc.</p> <p>The council has recently supported South Western Railways in its “Access for All bid” to the Department of Transport for step free access at Rayne’s Park and Motspur Park Stations. The council is also pushing for step free access at Wimbledon Chase Station through the planning process and delivery of a westbound access ramp for Haydon’s Road Station. Opportunity is also available to provide a second step free access for Morden Road Tram Stop.</p> <p>Improving connectivity in areas with a low Public Transport Accessibility Level (PTAL) score, especially by bus or other demand lead services offers an effective approach to support growth, access to employment and services as well as reducing reliance on private cars.</p>
<p>Electric buses/ taxi/ tram and hybrids.</p>	<p>A number of respondents stated that certain vehicle types are a major cause of air pollution and other environmental concerns.</p> <p>Council response: The London Mayor is committed to making London’s bus fleet cleaner with all TfL buses expected to be electric or hydrogen by 2037. The council believes that TfL’s bus replacement does not go far enough and should be accelerated so that the whole of greater London can enjoy the benefits of cleaner buses much sooner. We will continue to lobby TfL to make buses in Merton cleaner.</p> <p>The Council will lobby TfL, GLA and London Mayor to significantly accelerate the roll out of electric and hydrogen buses in outer London.</p>
<p>Public space air quality</p>	<p>Representations were made specifically in respect of the improvement made in Putney High Street and air quality. The information below shows the range of actions required to make a difference. All are action Merton would possibly consider and take appropriate action.</p> <ul style="list-style-type: none"> - Marked reduction in air pollutant levels along Putney High Street – this is particularly over the last 2-3 years and followed a study carried out some 5-6 years ago which showed that the bus fleet was responsible for many of the pollution issues in the local area. - This was not helped by the canyon layout of the street, which restricted dispersal of pollutants. The council and local groups successfully lobbied TfL to trial a fleet of low emission buses. This is now a permanent feature of Putney High Street and TfL has since introduced low emission bus zones in a few other select spots including near Clapham Junction also in Wandsworth Borough. - Last year, TfL also piloted new smart technology, which improved traffic flows along Putney High Street and reduced the numbers of

	<p>vehicles tailing back on the high street. Whilst this does not reduce the volume of vehicles, it does prevent the build of pollutants in a high pollution area as vehicles are generally held elsewhere and the flow along Putney High Street is relatively free.</p> <ul style="list-style-type: none"> - This pilot is also now a permanent feature on Putney High Street. The figures for pollutant levels have noticeably reduced and while still over recommended guidance levels, it is much closer to compliance and it is anticipated that this will continue as these new measures continue to have an effect. - Loading and unloading restrictions were also introduced in Putney High Street. This also has been the first of its kind for a London borough.
Cost of public transport	<p>Respondents highlighted that they currently did not use public transport due to the cost.</p> <p>Council response: The Council does not have any jurisdiction over the cost of public transport although the Council does work with TfL to lobby for value for money transport solutions for its residents.</p>

Sustainable Transport

More electric vehicles and charging bays	<p>Respondents highlighted that there were reasons why they had not to date seriously considered or purchased an electric vehicle. The two main reasons was the cost of electric vehicles and that concerned about limited electric charging stations.</p> <p>Council response: The council is also developing its infrastructure for electric vehicles. Merton's ambition by 2021/22 is to facilitate 125 electric charge vehicle points across the borough, including fast, rapid and residential charge points. There are currently 94 in operation.</p> <p>To encourage the uptake of electric vehicles, Merton Council is working with Source London, London Councils and Transport for London to put in place a mix of electric vehicle charging solutions. The London Plan and Merton's own Local Plan also requires that developers install a percentage of electric vehicle charging points within any new development with off-street parking.</p> <p>The council is working toward a target of 85% of all households being within 10-minute walk or 800m of a charge point by 2020/2021. To date there are around 94 active electric vehicle charge points in the borough, including 3 rapid charge stations.</p>
More car sharing, including Car Clubs	<p>Respondents stated that they would be likely to use car clubs if there were more car club bays, pick up/drop off points and charges were less. They felt that the car club availability would directly influence them to use a car club option rather than owning a personal vehicle.</p> <p>Council response: Merton is aiming to ensure that every resident has access to car club vehicles. There are 193,500 car club members in London and around ten car clubs. Transport for London (TfL) has committed to aiming for one million</p>

	<p>members by 2025. They offer a convenient and affordable service, while at the same time reducing overall car usage.</p> <p>Car clubs can provide you with an alternative means of accessing a car when you need one, without all the cost or hassle of owning one yourself. You can find car club cars parked on street throughout Merton.</p> <p>There are three car club companies available to the public in the borough, Bluecity, Zipcar and other TfL operators. There are currently on average over 60 vehicles operating in Merton with over 6,000 members.</p> <p>Providers will also be encouraged to adopt a greater proportion of all electric vehicles and move towards common access approaches e.g. single booking apps and sharing of data to boroughs and TfL.</p>
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Representations stating a need to own/access a car

<p>Disabled / elderly/ family/ work/ shopping/ weekend / visits to recycle centres / occasional use</p>	<p>Many respondents recorded that for a variety of reasons they required a car or access to a car:</p> <ul style="list-style-type: none"> - work purposes; often tradespeople/workers that had equipment for example required for their work that they would not be able to carry on public transport. - required access to a vehicle in order to transport family members, disabled relatives/friends, to meet carer needs, and undertake journeys that were not possible on public transport. - required access to a car so that they could undertake long journeys often at weekends. <p>Council response: The council accepts current life styles are often based around the convenient use of the car. This is an issue, which has evolved over many years, and the car is part of day-to-day life. However, current car use and numbers along with associated emissions are no longer sustainable; car use in London simply has to reduce. The council will continue to work with partners to help make the move away from car ownership easier. The council will however identify groups and individuals where the need to have easy and convenient access is high and ownership is still required.</p> <p>Improving connectivity in areas with a low Public Transport Accessibility Level (PTAL) score, especially by bus or other demand lead services offers an effective approach to support growth, access to employment and services as well as reducing reliance on private cars.</p> <p>Those residents who only require a car at the weekends could use the car club facilities in Merton.</p>
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Cycling

<p>Cycle lane improvement & promotion</p>	<p>A number of respondents stated that they would consider cycling as an alternative source of transport if there were more cycle lanes available, cycle lanes were segregated and the existing cycle lanes were improved. Segregated cycle lanes would encourage greater use by a wider range of cyclists.</p> <p>A number of respondents felt that Merton could encourage more motorists to cycle by promotion campaigns highlighting the cycle lanes in Merton and the advantages of cycling.</p> <p>Council response: Over the last 6 years, Merton Council has spent £19.2m on a number of LIP 1 & 2 projects. This includes £4m on cycle related schemes (including cycle training). Approximately 6 km of cycle routes have been delivered alongside 651 additional cycle parking spaces.</p> <p>The Council has limited annual funding to improve cycle provisions throughout the borough. This includes improvements to existing cycle lane; new cycle lanes; Quietways; cycle parking; road safety and cycle training.</p> <p>The Council will continue to be committed to promoting cycling.</p> <p>We offer training sessions to teaching staff and parents, supplying training bikes if necessary and have supported the Met Police with the Changing Places Programme showing HGV drivers and cyclist sight line dangers when cycling on road. Dr Bike Maintenance days are provided at 2 town centres to enable more cycling in the borough. We provide information on the Recycle A Cycle Scheme, which advises victims of bike theft to obtain a recycled bike.</p>
<p>Cycle safety</p>	<p>A number of respondents raised concerns about safe cycling within the borough.</p> <p>Council response: The council will continue to undertake reviews of cycle safety, invest in cycling infrastructure, closely monitor accident statistics and take steps to continually improve cycle safety, which includes training as mentioned above.</p>
<p>Better cycle parking facilities</p>	<p>Respondents highlighted that increasing the number of parking opportunities in Merton and access to bikes would encourage them to cycle within the borough.</p> <p>Council response: Cycling - as part of an integrated transport solution and to contribute to modal shift. Working with colleagues in Future Merton a number of options and costings are being considered including covered cycle parking areas with improved security and lighting in each of or car parks, again with the view to increasing the provision in the future.</p> <p>Approximately 6 km of additional cycle lanes have been delivered as well as 651 new cycle parking spaces.</p>
<p>Hire</p>	<p>Respondents stated that it would encourage them to cycle if they were able to hire bikes within Merton.</p> <p>Council response: There is significant potential to encourage residents to cycle more, especially for short commuter and leisure trips. The council is therefore working with TfL and neighbouring boroughs to facilitate a dock-</p>

	<p>less cycle hire scheme in Merton. This will enable residents to collect a hire bike from a number of designated cycle collection/drop off points across the borough and cycle to their destination.</p> <p>It is likely that a future Merton cycle hire scheme will operate from dedicated, predominately on-street collection/drop off bays. The council would particularly welcome operators that include electric bikes within their offer to help reach a wider mix of users, who might not otherwise cycle.</p>
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Environmental Considerations

<p>Idling/engine running</p> <p>More environmental/trees and green spaces</p> <p>Will encourage more dropped kerbs/ Less front gardens with greenery</p> <p>Road humps</p> <p>Car free/ pedestrianisation</p> <p>Heathrow</p> <p>Wimbledon Taxi</p> <p>Planning</p>	<p>Respondents raised a number of concerns regarding vehicles in relation to the environment within Merton. For example, their concerns ranged from vehicles with their engines idling, residents paving over front gardens thereby reducing the green spaces, they would like to see more trees and green spaces and a review of the number of road humps. There were some specific concerns regarding Merton’s response to the possible expansion to Heathrow, the number of Taxis in Wimbledon and the possibility of increasing the number of car free or pedestrian only areas.</p> <p>Council response: Merton has a clear commitment to tackle anti-idling and have installed 100 signs at locations in the borough with a further 100 planned. We are organising anti-idling events throughout the borough and will be formalising the enforcement process this year.</p> <p>Through its spatial policies contained in the London Plan and the Council’s own emerging Local Plan the council proactively encourages permit free development, especially around town centre locations and where access to public transport is good or could be improved through funded investment. The council is looking to rebalance the way streets are used so that they become places where people choose to walk or cycle and are not dominated by private cars and service vehicles. This could include the provision of small parklets or public spaces where people can sit and socialise.</p> <p>The provision of a third runway and expansion of Heathrow Airport recently cleared a major legal hurdle, which increases the likelihood that the plans will proceed. Whilst the council does not support this expansion. Should proposal pass the planning stage the council will work with neighbouring boroughs to ensure that transport impacts are mitigated as far as possible.</p> <p>The Mayor of London’s ambition is to make London a zero carbon city by 2050. As a local authority Merton will be following the Mayor of London’s lead in improving air quality and consider initiatives, such as the future expansion of the Ultra-Low Emission Zone, London-wide Low Emission Zone and Clean Air Zones, which target older and higher polluting diesel and petrol vehicles.</p>
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	<p>TfL is phasing diesel buses in favour of hybrids, electric and hydrogen buses. The Council will continue to lobby TfL to accelerate the pace of transition to these cleaner vehicles.</p> <p>As of 2018, all new black taxis must be zero emission capable and these vehicles cannot be older than 8 years. The Mayor for London has put in place incentives to speed up this transition.</p> <p>We are also working with TfL and Source London to identify suitable sites for rapid charge stations for taxis and other high usage vehicles. The council will work with the London Taxi Office to try to reduce the amount of engine idling.</p> <p>Where applications for residential crossovers meet the required access and design criteria the council cannot unreasonably refuse requests.</p> <p>The council's broader approach to off-street parking places is to encourage the retention of planting and the use of permeable surface materials.</p> <p>Road Humps - Historically area wide traffic calming measures in the form of horizontal and vertical deflections were introduced to reduce speed and rat running. With the borough wide 20mph speed limit, existing traffic calming features will ensure that motorists travel at lower speed.</p> <p>New development can allow us to establish sustainable travel patterns at the outset by helping to deliver better supporting infrastructure through financial or in-kind contributions, such as wider footways and land dedication to provide new facilities or linkages. The council will encourage developers to look beyond their site boundaries when seeking to mitigate the impacts of their proposals.</p> <p>The council is keen to promote more cycling and to optimise cycling potential in the borough, especially around town centres and other areas with good connectivity by public transport. This means ensuring that new development provides good quality cycle parking integral within the proposals, including ensure that visits are also confident in cycling to a location by installing secure short stay cycle parking.</p>
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Vehicles

<p>Government said buy diesel</p>	<p>A number of respondents highlighted that they were encouraged by the government to purchase diesel vehicles.</p> <p>Council response: In 2001, a vehicle excise duty (VED) system was introduced which made road tax charges cheaper for vehicles, which emitted less CO2 emissions. Typically, diesel vehicles emit less carbon dioxide (CO2) emissions than petrol cars, which saw more people, opt for diesels because they were cheaper to tax and perceived to be better for the environment.</p>
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	<p>However, despite diesel cars emitting less CO₂, they do produce disproportionately high emissions of nitrogen dioxides (NO_x) and particulates, both of which contribute greatly to local pollution levels and poor air quality.</p> <p>Merton Council accepts that previous governments encouraged the uptake of diesel vehicles to help reduce carbon emissions. That position has now reversed.</p>
EURO 6 Rating	<p>A number of respondents stated that they felt Euro 6 accredited vehicles should be acknowledged and reflected in the proposed parking charges. Effectively the respondents felt that despite buying a more efficient vehicle there was no benefit in the permit tariffs.</p> <p>Council response: It is widely known that diesel vehicles produce disproportionately high emissions of local air quality pollutants such as nitrogen dioxides and particulates. Under Euro classifications, certain newer diesel vehicles were purported to be less polluting.</p> <p>The council acknowledges these views and is currently undertaking a review of emission based charging. The report will be presented to Cabinet later in the year and all the comments received in this consultation will be considered as part of this review.</p>
HGV	<p>A number of respondents highlighted that there were a large number of HGV vehicles travelling within the borough. Some specific areas in the borough attract more HGV vehicles on a regular basis. The respondents felt that they were adding significantly to the poor air quality.</p> <p>Council response: We accept that HGV's contribute to poor air quality. There are existing controls to regulate these vehicles through a London wide Low Emission Zone which is currently being tightened by the GLA.</p>

Car parks

More car parks and improvements	<p>A number of respondents felt that Merton should increase the number of car parks available throughout the borough and the current car parks should be improved.</p> <p>Council response Merton is committed to continue improving its car parks and one of our objectives is to secure an accreditation for our car parks. This accreditation will deliver improvements such as; improved lighting in car parks, access, security, increased cycle spaces and more signage.</p>
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Schools

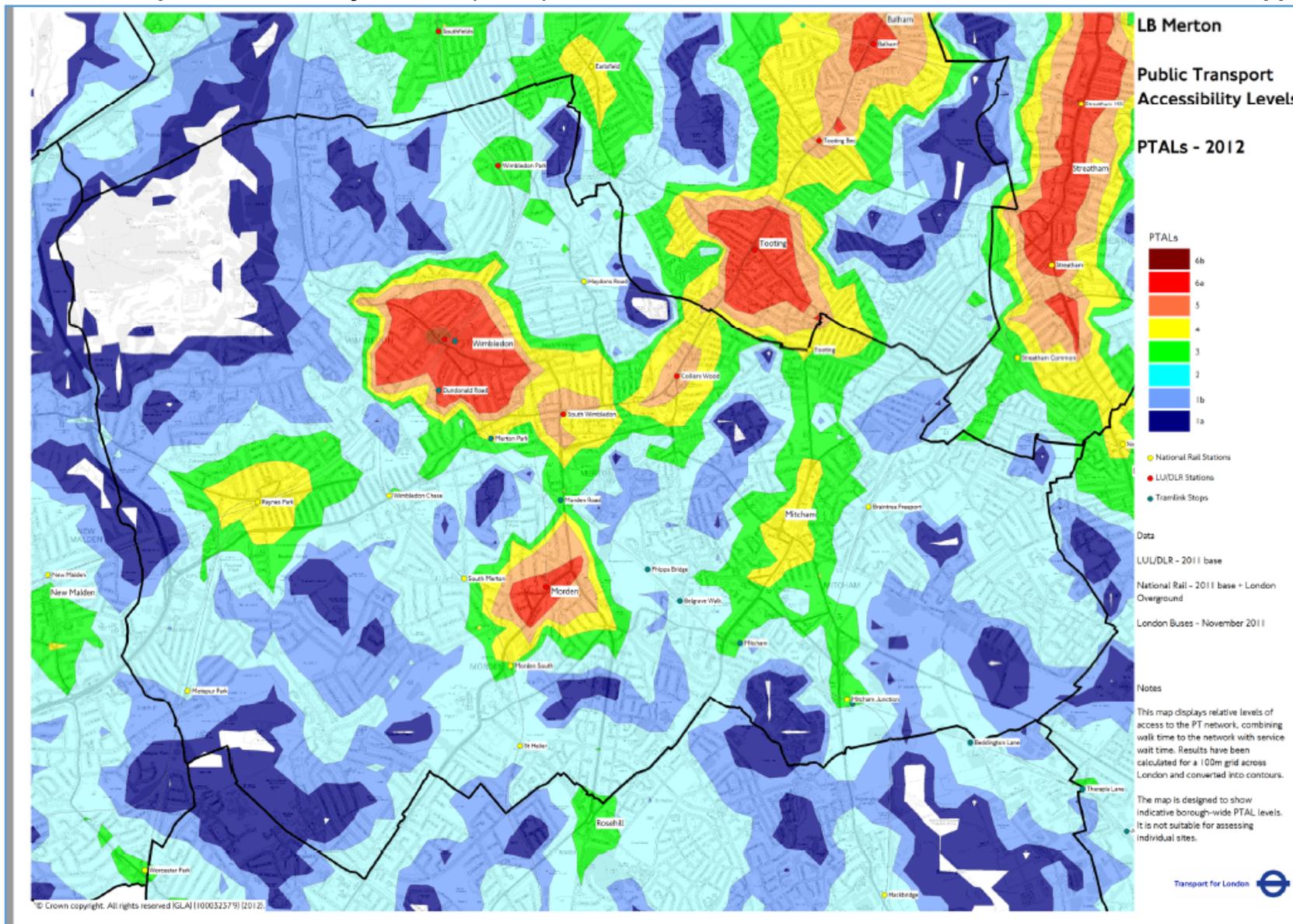
Car Free School Zones	<p>A number of respondents included comments on schools, including:</p> <ul style="list-style-type: none"> - increased traffic with children being driven to school - during the school holidays the roads were significantly less congested - imposing car free zones around schools would be beneficial. - a number of respondents recommended that children should be encouraged to walk or travel to school by public transport.
Catchment area/ walk to school	<p>Council response: The Council has identified four areas to trial temporary road closures outside schools during morning and afternoon peak periods.</p> <p>The council in partnership with the Police, Transport for London and schools themselves, work to improve road safety near schools.</p> <p>The management of road safety is in line with the Mayor of London’s strategy for healthy streets. The council has a rolling programme of works with individual schools that includes engineering measures:</p> <ul style="list-style-type: none"> - including localised 20mph speed limits to make the area outside the school safer; - support the school with their travel plans - provide soft measures such as cycles and scooter training as well as Kerbcraft. <p>All initiatives are designed to encourage a reduction on congestion generated by school traffic.</p> <p>Too many parents still choose to take their children to school by car increasing congestion on the road network and in close proximity to the school, especially during the morning and evening peak. At school home time, parents frequently arrive early to obtain nearby parking spaces and then sit waiting in their cars with engines running (or idling), all of which contributes to poor air pollution in Merton and across London.</p> <p>Merton also has a number of schools, that tend to have wider catchment areas across borough boundaries. This results in higher numbers of parents choosing to drive their children to school. By complementing school travel plans with a mix of physical and enforcement interventions, more of these trips could be made by foot for some or the entire journey. Improving the reliability and capacity of bus services could also support modal change.</p> <p>The council will proactively engage with public, private and special educational needs school’s to promote sustainable modes to work towards obtaining STARS school travel accreditation and that where schools are already engaged to push for a minimum Silver level accreditation.</p> <p>When development proposals for new educational facilities or school are submitted to the council, there will be a planning condition requirement for the new development to achieve a minimum bronze standard (STARS).</p> <p>The council will facilitate a programme of behaviour, road safety and educational initiatives, such as Junior Travel Ambassadors, scooter/cycle and kerb craft will continue to be offered. The council will support existing schools</p>

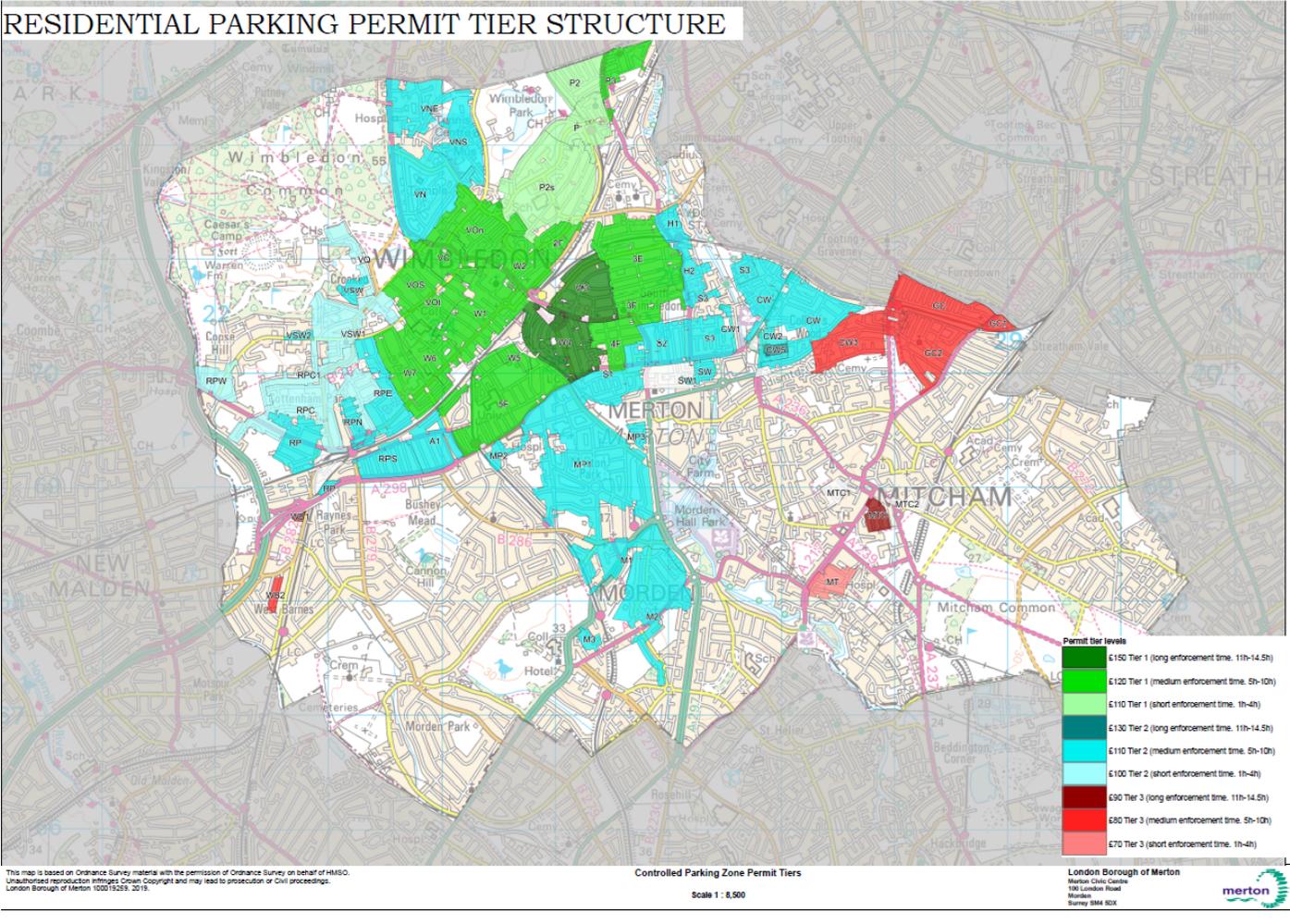
	wishing to expand on-site cycle and scooter parking facilities for pupils and staff through their travel plans.
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Walking

Walking in the borough	<p>Some respondents stated that walking in Merton, particularly in some areas was not pleasant. There were a variety of reasons such as volume of traffic, roadworks (limiting kerb space), poor signage, densely populated, poor street lighting and rubbish in the roads.</p> <p>Council response: The most direct and convenient walking routes between town centres and key attractors are often along difficult to cross, busy, traffic dominated connector streets and junctions. Focusing on some of these barriers and improving the wider journey experience should encourage more journeys by foot.</p> <p>Another disincentive to walking and cycling is the perceived dominance and speed of road traffic and lack of safe crossing places. Reducing traffic speed can reduce the severity of collisions and make streets more appealing places to walk and cycle especially for more vulnerable people who might otherwise be discouraged</p>
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Appendix 7a

Proposed Charges, On Street, Car Parks and residential Permits.

On Street Pay and Display.

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

Table of proposed charges. - Car Parks

Appendix 7b

CAR PARK (Inclusive of VAT).	Current hourly rate/flat fee	Proposed hourly rate/flat fee	Amendments Following consultation
WIMBLEDON			
Broadway	£1.00	£2.00	
Hartfield Road	£1.50	£2.00	
Queens Road	£1.00	£1.50	£2 flat fee between 6.00pm and 11pm
St Georges Road	£1.40	£1.50	£2 flat fee between 6.00pm and 11pm
MORDEN			
Kenley Road (flat fee)	£3.50	£7.00	
Morden Park (hourly)	£0.40	£0.60	
Morden Park (flat fee)	£5.00	£7.00	
Peel House Lower	£0.40	£0.60	
Peel House Upper (flat fee)	£5.00	£7.00	
Peel House Upper (hourly)	£0.50	£0.60	
York Close (flat fee)	£5.00	£7.00	
York Close (hourly)	£1.00	£1.20	
MITCHAM			
Elm Nursery	£0.50	£0.60	
Raleigh Gardens	£0.50	£0.60	
St Marks Road	£0.40	£0.60	
Sibthorpe Road	£0.70	£0.90	

Season Tickets

Mitcham Car Parks.

Mitcham Car Park	1 Month	+ 1 Month Diesel Surcharge £12.50	6 Months	6 month Diesel Surcharge £75	12 Months	12 Month Diesel Surcharge £150
Current charge	£25	N/A	£150	N/A	£300	N/A
Proposed local worker/ resident	£62.50	£75	£225	£300	£300	£450
Proposed commuter	£62.50	£75	£300	£375	£525	£675

Morden Car Parks

Morden	3 Months	3 Month Diesel Surcharge £37.50	6 Months	6 month Diesel Surcharge £75	12 Months	12 Month Diesel Surcharge £150
Current charge	£111	n/a	£223	n/a	£445	n/a
Proposed local worker/ resident	£350	£387.50	£525	£600	£700	£850
Proposed commuter	£393.75	£431.25	£700	£775	£1,225	£1,375

Queens Road Car Park Wimbledon

Queens Road - Wimbledon	3 Months	3 Month Diesel Surcharge £37.50	6 Months	6 month Diesel Surcharge £75	12 months	12 Month Diesel Surcharge £150
Current	£240	N/A	£480	N/A	N/A	N/A
Proposed local worker/ resident	£300	£337.50	£600	£675	N/A	N/A
Proposed commuter	£337.50	£375	£675	£750	N/A	N/A

RESIDENTIAL PARKING PERMITS

Zone duration	Tier 1 zones Wimbledon Town Centre	Tier 2 zones Part Colliers Wood/ South Wimbledon/ Rayne's Park/ Morden	Tier 3 zones Mitcham/ Part Colliers Wood	*100% electric vehicles All zones
Long (12 to 14.5 hrs)	£150	£130	£90	£20
Medium (6 to 10 hrs)	£120	£110	£80	£20
Short (1 to 4 hrs)	£110	£100	£70	£20

*The £20 fee is a reduction of £5 on the existing charge.

Note: A surcharge of £150 will continue to apply for all diesel vehicles.

Houses with multiple permits.

A second permit at the same property should incur a £50 surcharge, a third property a £100 surcharge, a 4th permit at £150.

Note: A surcharge of £150 will continue to apply for all diesel vehicles.

Visitor Voucher Charges

Tier	Half day	Full day
Tier 1 zones	£3.50	£5
Tier 2 zones	£3	£4
Tier 3 zones	£2	£3

Zone	Area	Tier 1	Time	Permit	New	Hours per	Annual
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			Group	price	Charge	weekday	visitor charge
W3	Wimbledon	Tier 1	Long	£65	£150	14.50	£400
W4	Wimbledon	Tier 1	Long	£65	£150	14.50	£400
2F	Wimbledon	Tier 1	Medium	£65	£120	10	£370
3E	Wimbledon	Tier 1	Medium	£65	£120	10	£370
3F	Wimbledon	Tier 1	Medium	£65	£120	10	£370
4F	Wimbledon	Tier 1	Medium	£65	£120	10	£370
5F	Wimbledon	Tier 1	Medium	£65	£120	10	£370
VC	Wimbledon Village	Tier 1	Medium	£65	£120	10	£370
VN*	Wimbledon	Tier 1	Medium	£65	£120	10	£370
Von	Wimbledon Village	Tier 1	Medium	£65	£120	10	£370
VOs	Wimbledon Village	Tier 1	Medium	£65	£120	10	£370
VOt	Wimbledon Village	Tier 1	Medium	£65	£120	10	£370
VSW*	Wimbledon	Tier 1	Medium	£65	£120	10	£370
VSW2*	Wimbledon	Tier 1	Medium	£65	£120	10	£370
W1	Wimbledon	Tier 1	Medium	£65	£120	10	£370
W2	Wimbledon	Tier 1	Medium	£65	£120	10	£370
W5	Wimbledon	Tier 1	Medium	£65	£120	10	£370
W6	Wimbledon	Tier 1	Medium	£65	£120	10	£370
W7	Wimbledon	Tier 1	Medium	£65	£120	10	£370
P3	Wimbledon Park	Tier 1	Medium	£65	£120	7	£370
VNe*	Wimbledon	Tier 1	Medium	£65	£120	6	£370
VNs*	Wimbledon	Tier 1	Medium	£65	£120	6	£370
		Tier 1					
P1	Wimbledon Park	Tier 1	Short	£65	£110	4	£360
P2	Wimbledon Park	Tier 1	Short	£65	£110	4	£360
P2S	Wimbledon Park	Tier 1	Short	£65	£110	4	£360
VSW1*	Wimbledon	Tier 1	Short	£65	£110	4	£360
VQ*	Wimbledon	Tier 1	Short	£65	£110	3	£350

Controlled Parking Zone charges Tier 1

Appendix 7d

* Moved to tier 2.

Controlled Parking Zone charges Tier 2

Appendix 7e

Zone	Area	Level	Time Group	Permit price	New Charge	Hours per weekday	Annual visitor charge
CW5	Colliers Wood	Tier 2	Long	£65	£130	12.5	£380
CW	Colliers Wood	Tier 2	Medium	£65	£110	10	£360
CW1	Colliers Wood	Tier 2	Medium	£65	£110	10	£360
CW2	Colliers Wood	Tier 2	Medium	£65	£110	10	£360
CW4	Colliers Wood	Tier 2	Medium	£65	£110	10	£360
M1	Morden	Tier 2	Medium	£65	£110	6	£360
M2	Morden	Tier 2	Medium	£65	£110	6	£360
M3	Morden	Tier 2	Medium	£65	£110	10	£360
MP2	Merton Park	Tier 2	Medium	£65	£110	10	£360
MP3	Merton Park	Tier 2	Medium	£65	£110	10	£360
S1	South Wimbledon	Tier 2	Medium	£65	£110	10	£360
S2	South Wimbledon	Tier 2	Medium	£65	£110	10	£360
S3	South Wimbledon	Tier 2	Medium	£65	£110	10	£360
SW	South Wimbledon	Tier 2	Medium	£65	£110	10	£360
MP1	Merton Park	Tier 2	Medium	£65	£110	6	£360
A1	Rayne's park	Tier 2	Medium	£65	£110	10	£360
RP	Rayne's Park	Tier 2	Medium	£65	£110	10	£360
RPE	Rayne's Park	Tier 2	Medium	£65	£110	10	£360
RPN	Rayne's Park	Tier 2	Medium	£65	£110	10	£360
RPS	Rayne's Park	Tier 2	Medium	£65	£110	10	£360
H1	Haydon Road SW19	Tier 2	Medium	£65	£110	10	£360
H2	Haydon Road SW20	Tier 2	Medium	£65	£110	10	£360
VN*	Wimbledon	Tier 2	Medium	£65	£110	10	£330
VSW2*	Wimbledon	Tier 2	Medium	£65	£110	10	£330
VSW*	Wimbledon	Tier 2	Medium	£65	£110	10	£330
VNe*	Wimbledon	Tier 2	Medium	£65	£110	6	£330
VNs*	Wimbledon	Tier 2	Medium	£65	£110	6	£330
RPW	Rayne's Park	Tier 2	Short	£65	£100	4	£320
RPC	Rayne's Park	Tier 2	Short	£65	£100	1	£320
RPC1	Rayne's Park	Tier 2	Short	£65	£100	1	£320
MT	Mitcham	Tier 2	Short	£65	£100	4	£320
VSW1*	Wimbledon	Tier 2	Short	£65	£100	4	£320
VQ*	Wimbledon	Tier 2	Short	£65	£100	3	£320

*Denotes was previously in Tier 1 now recommended as Tier 2.

Zone	Area	Level	Time Group	Permit price	New Charge	Hours per weekday	Annual visitor charge
MTC	Mitcham	Tier 3	Long	£65	£90	14.5	£340
CH	Cannon Hill	Tier 3	Long	£65	£90	12	£340
WB1	West Barnes	Tier 3	Long	£65	£90	12	£340
CW3	Colliers Wood	Tier 3	Medium	£65	£80	10	£330
GC	Mitcham	Tier 3	Medium	£65	£80	10	£330
GC1	Mitcham	Tier 3	Medium	£65	£80	10	£330
GC2	Mitcham	Tier 3	Medium	£65	£80	10	£330
WB2	West Barnes	Tier 3	Medium	£65	£80	6	£330
MT	Mitcham	Tier 3	Short	£65	£70	4	£320

Benefits of walking and cycling

Please see attached document.

Appendix 8

Walking & cycling: the economic benefits

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What is this pack?

This pack outlines the economic benefits of encouraging more walking and cycling in cities. It sets out the strongest evidence from London and elsewhere, grouped into six major topic areas.

It is aimed at policy makers, local communities, officers in local and national government, business networks and everyone else who is interested in how investment in walking and cycling can create more prosperous cities.

This pack has been produced by Transport for London (TfL) as part of an ongoing collaboration with partners across London, and has been published as part of TfL's online hub for the economic benefits of walking and cycling. We are particularly grateful to representatives from the Department for Transport, the University of Westminster, GlaxoSmithKline, the London Boroughs of Enfield, Hackney and Southwark, the Bicycle Association, Sustrans, the London Cycling Campaign, Cycling UK and Living Streets for their support in developing this evidence base.

OVERVIEW

Investment in walking and cycling helps encourage more Londoners to travel in a greener and healthier way. It also brings significant benefits for the economy:

Boosting the high street and local town centres:

walking and cycling improvements can increase retail spend by up to 30%.

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Reducing absences and increasing productivity:

People who are physically active take 27% fewer sick days each year than their colleagues.

Attracting employees and businesses:

Businesses see walking and cycling as key to attracting and retaining the staff they need to thrive

Keeping the city moving for business:

New cycle lanes in London have helped some streets carry up to 5% more people at the busiest times.

Wider Economic Benefits:

Investing in walking and cycling can prevent billions of pounds worth of health and environmental damage.

Helping everyone share the benefits:

Active travel is accessible and inclusive. Making it easier to walk and cycle means that more Londoners can enjoy the benefits

Walking & cycling is good for the high street

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People walking and cycling visit high streets more frequently and spend more money there compared to people in cars

High streets that are nice places to walk, cycle and spend time in attract more shops, making the high street more economically viable and vibrant

HIGHER SPENDS



High street walking, cycling and public realm improvements can

increase retail sales
by up to **30%**

Source: Lawlor, 2013

Cycle parking delivers



5x

the retail spend per square metre than the same area of car parking

Source: Raje and Saffrey, 2016

People who walk and cycle take more trips to the high street over the course of a month

Average number of visits to local town centre each month, by mode



16 visits



12 visits



8 visits

Source: TfL 2014

Over a month, people who walk to the high street spend up to

40% more



than people who drive to the high street

Source: TfL, 2013

Walking and cycling helps create
thriving high streets



As well as more customers, this brings benefits to the local community



Making it easy to walk and cycle to high streets means that more Londoners can enjoy these opportunities

SOCIAL VALUE

45%

of visitors to London high streets visit for **social and community** reasons



Source: Hall et al, 2017

Improving London high streets for walking and cycling led to a

216%

increase in people **stopping, sitting or socialising**



Source: Carmona et al, 2018

THRIVING HIGH STREETS

Retail vacancy was **17% lower** after high street and town centre improvements...



...and retail rental values **rose by 7.5%**

Source: Carmona et al, 2018

Businesses may overestimate their customers' car use

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Businesses on Lea Bridge Road think their customers travel to the area:

However, visitors said they travelled:

by car **63%**   by car **20%**

walk **49%**   walk **64%**

public transport **41%**   public transport **54%**

cycle **12%**   cycle **12%**

Source: London Borough of Waltham Forest

What do BIDs say?

9 in 10

say walking and cycling creates vibrant areas

83%

say it attracts more customers

Source: Aldred & Sharkey, 2017



GLOBAL EVIDENCE

A study of businesses in **Portland** found people walking and cycling spent more in a month than drivers.

Source: Clifton et al., 2012

Streets with dedicated cycle lanes in **New York** saw a larger rise in retail sales compared to the surrounding area.

Source: New York DOT, 2014

Businesses on two **Dublin** shopping streets overestimated how many customers travel by car and underestimated how many cycle.

Source: O'Connor et al., 2011

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People who walk and cycle in **San Francisco** visit shops more often and spend more in a month than drivers.

Source: Bent and Singa, 2009

In **Los Angeles** sales tax revenue rose by two thirds after cycle lanes were built – 14% higher than unimproved areas.

Source: McCormick, 2012

For every square metre of parking space in **Bern**, customers who cycled generated 7,500 EUR compared to 6,625 EUR from car drivers.

Source: [Fahrradportal](#) (online)

People who cycle to shops and supermarkets in **Copenhagen** spend more each year than people who drive. Two thirds of shopping trips and half the total revenue comes from customers on foot and cycle.

Source: Copenhagen Bicycle Account, 2012

Walking & cycling boosts productivity

Page 99

People who walk and cycle regularly have been shown to take less sick days, be more productive at work and enjoy their job more

Encouraging more people to walk and cycle more can help give London's economy a big productivity boost

REDUCED ABSENTEEISM

Employees who are physically active take

27%



fewer sick days

than their colleagues

Source: National Institute for Health and Care Excellence, 2012

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Employees who cycle regularly take



fewer sick days each year than those who don't...

... this is worth

£128m

every year to the national economy

Source: Hendriksen, et al, 2010

Source: Grous, 2011

INCREASED PRODUCTIVITY



73% of employees who cycle felt it makes them **more productive** at work

Page 101

Source: The Prince's Responsible Business Network, 2011

54%



of people who cycle to work

feel **happy**

& **energised**

during their commute - more than any other mode

Source: CycleScheme, 2015

People who walk to work report



greater job satisfaction

and wellbeing – which in turn leads to increased employee retention and reduced costs to businesses.

Source: Chatterjee, 2017

Businesses see real value in walking & cycling

Page 102

People want to live and work in areas that offer a high quality of life. For many, this means places where they can walk and cycle

Creating great places for walking and cycling strengthens London's talent pool and give businesses a competitive advantage

More and more businesses around the capital are voicing their support for walking and cycling

ATTRACTING AND RETAINING STAFF

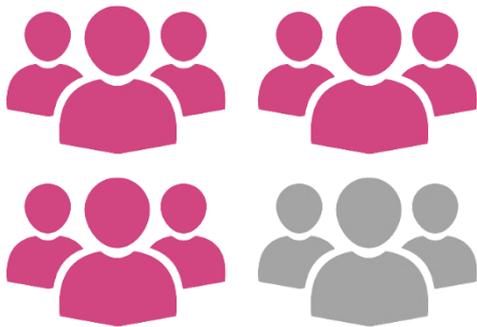
“ Our network of offices will be knitted together by Cycle Superhighways. We look forward to using the protected routes to help us attract and retain the people we need to thrive ”

Michael van der Bel, former CEO of Microsoft UK

Source: Cycling Works, 2014

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By 2025 3 in 4 workers will be **millennials**



Millennials are more focussed on the **environment** and **use cars less**

Source: Deloitte, 2014

73% of London BIDs say **walking and cycling** are important for **attracting and retaining staff**

Source: Aldred & Sharkey, 2017

BUSINESS BENEFITS

85%



think that cycling is important

Business Improvement Districts agree that active travel is important for their business performance

95%



think that walking is important

Businesses are **prioritising** offices with high-quality cycling facilities

Source: British Council of Offices, 2017

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Why do BID's think walking and cycling is important for business?



Attracting more customers



Creating vibrant areas



Attracting and retaining staff

Source: Aldred & Sharkey, 2017



BUSINESS SUPPORT

“Cycling is a fundamental part of the future city and has been a critical factor in Google’s decision to invest in King’s Cross and London. Cycling has an important role to play in attracting and retaining talent”

Dan Cobley, former CEO of Google UK

“Businesses in London Bridge are keen to make it a safe and attractive place to walk and cycle. With continued growth in the area, creating a street environment that makes cycling convenient, safe and attractive is more pressing than ever”

Nadia Broccado, CEO of Team London Bridge BID

BUSINESS SUPPORT

In 2014 over

180

major London employers
came together to support plans
for new protected cycle routes

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“ *The proposed north-east and east-west routes will help us **attract and retain the employees our business needs to thrive**. They will also make London a **more attractive city** in which to build and run our business* ”

John Ridding, CEO of Financial Times

Walking & cycling keeps London moving

Page 107

Congestion costs London's economy £9.5bn each year, and the challenge will grow as the city's population grows and travel increases

Walking and cycling, along with public transport, are the most efficient uses of limited road space. By encouraging walking and cycling we can move more people on our streets. This keeps the city moving for everyone

KEEPING STREETS MOVING

London is growing by...

6 new residents
every hour



That's a car load
every 40 minutes



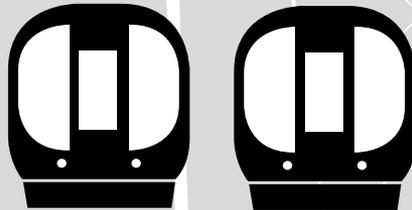
or

2 Buses
every day



or

2 Tube trains
every week



Today the population is

8,800,000

and by 2030, it will be

10,000,000

Congestion
costs London's
economy



£9.5bn
every year

Source: INRIX, 2017

KEEPING STREETS MOVING

One car takes up the same space as...



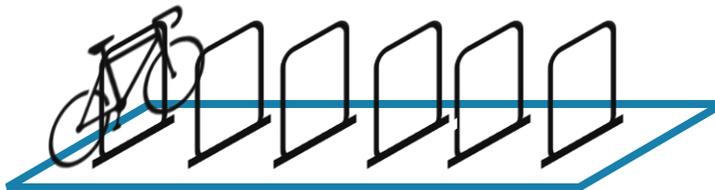
5 people cycling

or



20 people walking

or



12 cycle parking spaces

The average car in London carries:



1.56 people

KEEPING STREETS MOVING

Segregated cycle lanes on Blackfriars Bridge help the street move

5% more people

in the am peak than before

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Source: TfL analysis

Businesses using **cycle freight save** between

39 and **64%**
on **delivery costs**

Source: Raje and Saffrey, 2016

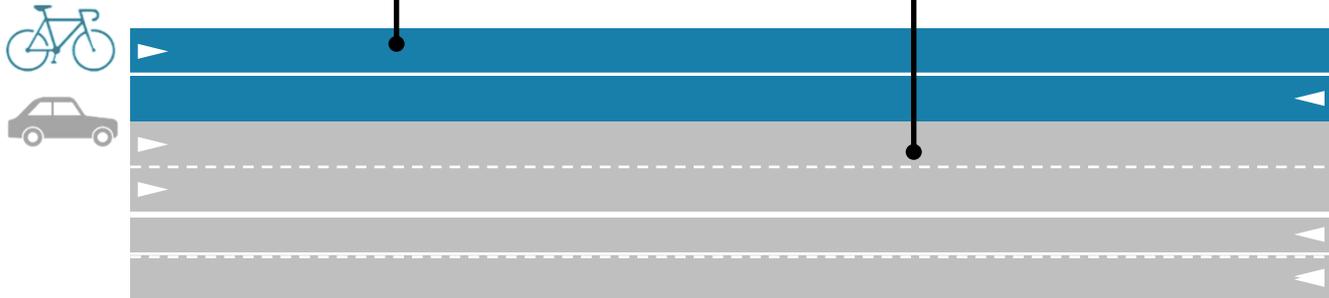


Cycle lane north:

1,938 people per hr

Vehicle lanes north:

1,542 people per hr



BLACKFRIARS BRIDGE, AM PEAK 08:00 – 09:00

Walking & cycling helps the wider economy

Page 111

Walking and cycling already make an important contribution to Britain's economy, and encouraging more people to walk and cycle will provide a further boost

Investment in walking and cycling is a cost-effective way to unlock these benefits, including significant savings to the NHS

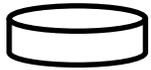
VALUE FOR THE ECONOMY

13:1 is the average 'Benefit Cost Ratio' for walking and cycling projects

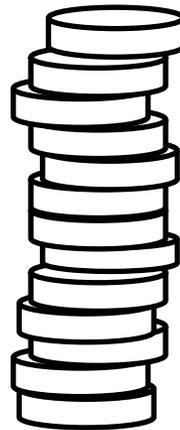
this means for every

Page 112

£1 spent on walking and cycling,



→ **£13** of benefits are returned to the economy



“ Based on the BCRs reported ... one can confidently conclude that sustainable travel and cycling and walking in particular regularly offer

high and very high value for money ”

Source: Department for Transport, 2015

Cycling contributes

£5.4bn



each year to the UK economy

...more than

3x



the contribution of the UK steel industry

Source: Newson and Sloman, 2018

SUPPORTING THE NHS

If every Londoner walked or cycled for 20 minutes each day, this would save the NHS

£1.7bn

in treatment costs over 25 years

Page 1 of 3

If as a nation we keep piling on the pounds around the waistline, we'll be piling on the pounds in terms of future taxes needed just to keep the NHS afloat.

I don't think it's any exaggeration to say that the health of millions of our fellow citizens, the sustainability of the NHS, and the economic prosperity of Britain now depends on a radical upgrade in prevention and public health. ”

Simon Stevens, NHS Chief Executive



Source: Department of Health, 2011

SUPPORTING NEW DEVELOPMENT

As the Cycle Hire scheme has expanded outside of central London and into areas that are a lengthy walk from the Tube, we have seen a dramatic increase in tenant enquiries for those areas ”

Marc von Grundherr, Director, Benham & Reeves Residential Lettings

Source: Steer, 2017



The fact that buyers expect cycle storage in new developments affects saleability and desirability of the property ... if we did not provide cycle parking, desirability of the properties would be negatively affected ”

Linden Homes

Source: Steer, 2017

Everyone shares the benefits

Page 115

Everyone should be able to benefit from London's economic success

Walking and cycling are inclusive ways to travel that can help people access employment and opportunities easily and cheaply

The economic benefits of walking and cycling are not constrained to central London: businesses in all parts of the Capital can benefit from making it easier to walk and cycle

ACCESSIBILITY AND AFFORDABILITY

The economic benefits of walking and cycling can be enjoyed by everyone in London



81% of Londoners say they **can cycle**, including...

3 in 4 older people (aged 65+)

76% of disabled people

Source: TfL customer research, 2017

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Active travel is more affordable
Average cost of travel each year:



£0



£250

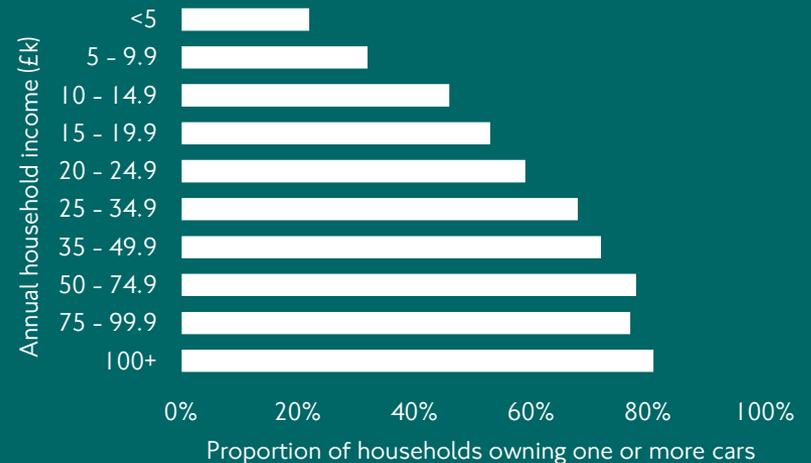
Cost of a quality cycle, lights and lock



£7,300

Yearly cost of running a car in London

Car ownership in London increases with household income



Source: TfL analysis, 2010, figures adjusted for inflation

Source: London Travel Demand Survey, 2013/14

SUPPORTING BUSINESSES ACROSS LONDON

The economic benefits of walking and cycling can be enjoyed everywhere in London

Page 117
Over



99%

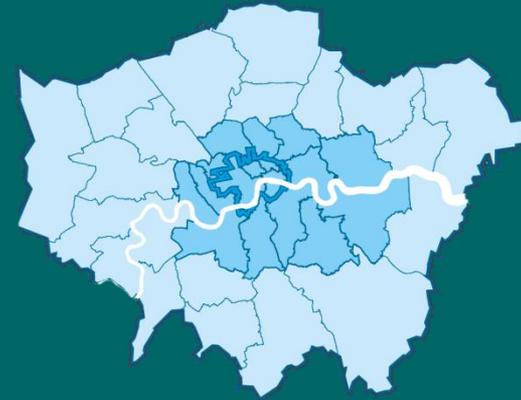
of London employers are **small and medium-sized enterprises**

SMEs provide

1/2

London's jobs

2 in 3

 London jobs are outside central London

Every Londoner

lives within a 10 minute walk of a high street



SUMMARY

The evidence in the pack shows that investment in walking and cycling has the potential to bring significant benefits across a number of facets of the economy.

In London, TfL and boroughs are working to make walking and cycling easier for everyone by investing in initiatives to address the barriers to walking and cycling, including improved streets and community grants. The evidence in this pack can be used to support this investment by:

- Making the case for overall investment in walking and cycling to decision makers;
- Informing the strategic narrative for walking and cycling business cases;
- Supporting consultation and engagement around specific schemes and projects.

The pack can be used in its entirety, or specific content can be extracted to contribute to presentations or other documents. A full reference list is provided, and further information can be found on the economic benefits of walking and cycling [online hub](#).

We would like to keep the pack regularly updated with the latest research, evidence and case studies on the economic impacts of walking and cycling.

Please email activetravel@tfl.gov.uk with any suggestions or additional evidence.

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Equality Analysis



Please refer to the guidance for carrying out Equality Impact Assessments is available on the intranet
 Text in blue is intended to provide guidance – you can delete this from your final version.

What are the proposals being assessed?	A review of the proposed charges by Parking Services for on street pay and display, off street pay and display and permit to help deliver key strategic council priorities including public health, air quality and sustainable transport
Which Department/ Division has the responsibility for this?	Parking Services, Environment and Regeneration

Stage 1: Overview	
Name and job title of lead officer	Ben Stephens, Head of Parking
1. What are the aims, objectives and desired outcomes of your proposal? (Also explain proposals e.g. reduction/removal of service, deletion of posts, changing criteria etc.)	<p>Merton wishes to ensure that the highest priority is given, to its responsibilities to deliver cleaner local air at a time when the current situation has been described as a global public health emergency. We are delivering a new Air Quality Action Plan that is ambitious in its aims and already demonstrates that we as an authority will use all of the powers available to us, not only to challenge and tackle this problem; but also to work towards delivering our legal responsibilities to protect the public.</p> <p>The council recognises the part that it has to play, in developing and delivering a framework to tackle air quality, demand for parking, and congestion in the borough. It does not stand alone on these issues. All of the other London boroughs are seeking to implement new parking policies to tackle similar problems.</p>

	<p>There are very few direct levers available to stimulate a change in driver behaviour, and the council believes that the rationale for setting the new parking charges is about giving people the right nudge and opportunity to make different choices.</p> <p>From November 2018 through to January 2019, Cabinet considered and agreed a series of reports setting out its approach to Public Health, air quality and sustainable transport – a strategic approach to parking charges. These reports set out the key strategic drivers that will affect parking policy for the future.</p> <p>Then, and now, Members are requested to exercise their statutory duty to secure the expeditious, convenient and safe movement of traffic, and the provision of suitable and adequate parking facilities in the context of the public health agenda. This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p>This report supports the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.</p> <p>The report explains the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by ‘making the healthy choice the easy choice’.</p> <p>In setting out its measures of success, the new charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets - to benefit residents and businesses alike.</p> <p>Local authorities are not permitted to use parking charges solely to raise income. When setting charges, we must instead focus on how the charges will contribute to delivering the Council’s traffic management and other policy objectives.</p>
<p>2. How does this contribute to the council’s corporate priorities?</p>	<p>It contributes in the following ways:</p> <ol style="list-style-type: none"> 1. Reduce congestion

2. Improve road safety
3. Improve air quality and meet EU quality standards
4. To meet the actions set out in the Merton Health and Wellbeing Strategy 2019
5. Less sedentary behaviour
6. Improve physical and mental health outcomes
7. Reduce health inequalities
8. Adopt a healthy street approach
9. Promote healthier life styles and encourage more active travel
10. To ensure good parking management
11. To support the local economy
12. Providing funding for parking and wider transport scheme improvements

Merton's Health and Wellbeing Strategy 2019-24

A key theme within the Health and Wellbeing Strategy is Healthy Place. A recent Healthy Places Survey led by the Council's Environment and Regeneration department¹ revealed the top priorities identified by residents for creating healthy places which includes air quality, green infrastructure and open spaces including parks, good cycling and walking routes, paths and lanes.

Better air quality: Improving air quality is important because 6.5% of mortality in Merton is attributable to poor air quality. ²

By helping to reduce vehicle emissions and supporting the shift to sustainable and active modes of transport, parking policy can improve air quality, which in turn will have positive benefits for people's health.

¹ Survey data available here: <https://www.merton.gov.uk/assets/Documents/Healthy%20Places%20survey%20responses%20Jan18.pdf>

² Data available here:

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

There is ample evidence on the impact of air quality on health. Over time, poor air quality is associated with a range of mortality and morbidity outcomes. Exposure to poor air quality is associated with a range of cardiovascular, respiratory and cerebrovascular health effects³ and recent evidence suggests there may be a link between air pollution and a person being at increased risk of developing dementia.⁴ Evidence suggests a link between exposure to air pollution and cognitive performance.^{5 6} In Scotland, a recent study found spikes in poor air quality to be associated with increased hospital admissions and GP surgery visits.⁷

Safer, less congested roads:

In 2016, there were 579 people slightly injured and 44 people killed or seriously injured due to road traffic accidents in Merton.⁸ By reducing congestion, incentivising people to use sustainable modes of transport, and using the revenue raised through parking charges to improve transport infrastructure, parking charges can help to reduce the number of road traffic accidents in Merton, leading to fewer deaths from road traffic accidents and a reduction in hospital-related admissions from road traffic injuries.

The INRIX 2017 Global Traffic Scorecard ranked the UK as the 10th most congested country in the world and the 3rd most congested in Europe. London has remained the UK's most congested city for the 10th year in a row, ranked second in Europe after Moscow.⁹ Demand-based parking

³ WHO, *Health risks of air pollution in Europe-HRAPIE project. New emerging risks to health from air pollution-results from the survey of experts*. 2013. Available here: http://www.euro.who.int/__data/assets/pdf_file/0017/234026/e96933.pdf?ua=1

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⁵ Zhang et al. *The impact of air pollution on cognitive performance*. *Proceedings of the National Academy of Sciences* Sep 2018, 115 (37). Available here: <http://www.pnas.org/content/115/37/9193>

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⁷ Goeminne. P et al. *The impact of acute air pollution fluctuations on bronchiectasis pulmonary exacerbation: a case-crossover analysis*. *European Respiratory Journal* Jul 2018, 52 (1) 1702557; DOI: 10.1183/13993003.02557-2017. Available here: <http://erj.ersjournals.com/content/52/1/1702557>

⁸ Travel in London 10 supplementary Information

⁹ <http://inrix.com/scorecard/>

charges for on street parking can help reduce the congestion caused by drivers cruising the streets in search of a place to park. This is also good for the economy- it has been estimated that motorists in London spend around 74 hours per year in congestion at peak times, costing them individually £2, 430 per year, or £9.5 billion across the city.¹⁰

Improved physical and mental health of Merton residents:

In Merton, levels of physical activity has dropped by two percentage points in two years.¹¹ Furthermore based on Department for Transport statistics for 2016/17 the proportion of adults doing any walking or cycling once a week is 77.9% down from 81.5% for 2015/16.

By supporting the shift to more sustainable and active modes of transport, improving air quality and generally making streets more pleasant places for Merton residents to spend their time, parking policy can help increase the physical and mental health of Merton residents. This can help reduce levels of childhood and adult overweight and obesity. In Merton, one in five children entering reception are overweight or obese and this increases to one in three children leaving primary school in Year 6 who are overweight or obese.

Healthy places:

The 'healthy streets' approach defines a healthy street as one with: things to see and do; places to stop and rest; shade and shelter; clean air; and pedestrians from all walks of life. It must be easy to cross; and feel safe, relaxing and not too noisy. Put simply, it needs to be an environment in which people choose to walk and cycle. Action against these indicators ultimately improves health, and parking policy has a role to play for example, by helping improve air quality, and incentivising people to walk, cycle and use public transport.

Merton Air Quality Action Plan 2018-2023

Merton's Air Quality Action Plan 2018-2023 strongly supported by Members is a key policy document, which clearly sets out the links between vehicle use and air quality in the Borough. Air

¹⁰ <http://inrix.com/press-releases/scorecard-2017-uk/>

¹¹ Levels of physical activity has dropped from 38 percent of residents doing at least two x 10 minutes of active travel a day in 2013/14 to 2015/16 to 36 percent in 2014/15 to 2016/17.

	<p>pollution is recognised, as a major contributor to poor health with more than 9000 premature deaths attributed to poor air quality in London Air pollution is associated with a number of adverse health impacts: it is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality are often less affluent.</p> <p>Air quality has been identified as a priority both nationally and within London, where pollution levels continue to exceed both EU limit values and UK air quality standards. Pollution concentrations in Merton have historically and continue to breach the legally binding air quality limits for both Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀). The air quality-monitoring network run by Merton has shown that the UK annual mean NO₂ objective (40µg/m³) continues to be breached at a number of locations across the borough. In some locations the NO₂ concentration is also in excess of the UK 1-hour air quality objective (60µg/m³) which indicates a risk not only to people living in that area but also for those working or visiting the area.</p> <p>In Merton an Air Quality Management Area (AQMA) has been declared for the whole borough. The AQMA has been declared for the following pollutants: Nitrogen Dioxide: we are failing to meet the EU annual average limit for this pollutant at some of our monitoring stations and modelling indicates it is being breached at a number of other locations. We may also be breaching the UK 1-hour Air Quality Objective based on measured concentration for NO₂ being in excess of 60µg/m³ at some locations within the borough. There are four focus areas in the borough. These are in the main centres of Mitcham, Morden, Raynes Park and Wimbledon.</p> <p>Parking and Traffic Management This proposed Parking Charges report sets out the important role Parking and transport policy has in managing the roads and wider travel needs of the public. Merton's policy links closely with the local Implementation Plan and the Mayors Transport Strategy, which sets out objectives in detail.</p>
<p>3. Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc.</p>	<p>The proposal will affect all residents, businesses, workers and visitors to the borough, across all socio-economic groups. In order to set the context for the proposal the following profile has been used.</p> <p>Merton's profile</p>

Merton has a diverse and growing population. In 2018, Merton has an estimated resident population of 209,400, which is projected to increase by about 3.9% to 217,500 by 2025. The age profile is predicted to shift over this time, with notable growth in the proportions of older people (65 years and older) and a decline in the 0-4 year old population.

Age	Percentage of total population
0-4	7.4%
5-17	15.7%
18-64	64.5%
65-84	10.7%
85+	1.7%

Source: GLA Housing led projection, data from 2016 SHLAA

Sex

Age	Female	Male
0-4	106,045 (51%)	103,370 (49%)
5-17	16,077 (49%)	16,733 (51%)
18-64	68,266 (50.5%)	66,914 (49.5%)
65-84	11,840 (53%)	10,500 (47%)
85+	2,287 (63%)	1,343 (37%)

Source: The 9 Protected Characteristics, Merton. Available from:
<https://www2.merton.gov.uk/9%20PC%20July%202018%20Final.pdf>

In 2018, east Merton has an estimated resident population of 110,200 which is projected to increase to 113,900 by 2025 (a 3.3% increase) compared to west Merton, which has an estimated resident population of 99,200 which is projected to increase to 103,600 by 2025 (a 4.5% increase). East Merton generally has a larger younger population of 0-29 year olds compared to west Merton, which generally has a larger population of people, aged 35 and over.

In 2018, Merton has an estimated 135,200 working age population (18-64 year olds), which make up 64.5% of the total population. By 2025 this is predicted to increase in numbers to almost 140,000 (although decrease slightly as a proportion of the total population, to 64.3%). Almost 72,000 of this age group currently reside in east Merton compared to 63,200 in west Merton. There is expected to be an increase by 2025 to 73,800 in east Merton and 66,200 in west Merton.

Merton has 22,350 people aged 65-84 years old (10.7% of the total population). By 2025, this is predicted to increase to 24,350 (11.2%). 10,350 live in east Merton compared to 12,000 in west Merton. By 2025 there is expected to be an increase to 11,550 in east Merton and almost 12,800 in west Merton.

An estimated 3,650 people aged 85 years and over (1.7% of the total population) currently live in Merton. By 2025, this is predicted to increase to almost 3,950 (1.8%). In 2018, 1,450 live in east Merton compared to almost 2,200 in west Merton. By 2025 there is expected to be an increase to 1,550 in the east compared to 2,400 in the west of Merton.

Currently, 77,740 people (37% of Merton's population) are from a Black, Asian, or Minority Ethnic (BAME) group; by 2025, this is predicted to increase to 84,250 people (38% of Merton's population). English, Polish and Tamil are the most commonly spoken languages in Merton.

Race and ethnicity

The 2011 Census identified that:

- 48.4% of the population are white British, compared to 64% in 2001.
- 35% of Merton's population is from a Black, Asian and Minority Ethnic (BAME) groups (this includes non-white British).

The findings of the 2011 when compared to 2001 Census identified:

- -10% decrease in the overall White population
- -6% increase in the Asian,
- -3% increase in the Black population
- -2% increase in Mixed groups

According to the Greater London Authority (GLA): 2015 round ethnic group projections there are currently 77,740 people (37% of Merton's population) from a BAME group. This is projected to increase by 2025 to 84,250 people (+1%).

The health of people in Merton is generally better than the London and England average. Life expectancy is higher than average and rates of death considered preventable are low. This is largely linked to the lower than average levels of deprivation in Merton.

Significant social inequalities exist within Merton. The eastern half has a younger, less affluent and more ethnically mixed population. The western half is less ethnically mixed, older and more affluent. Largely as a result, people in East Merton have worse health and shorter lives.

Life Expectancy at birth in Merton is 80.4 years for males and 84.2 years for females.¹⁰ In east Merton, life expectancy in men is 78.9 years compared to 82.1 years in west Merton. Women's life expectancy is 83.3 years in the east compared to 85.0 years in west Merton. There is a gap of 6.2 years in life expectancy for men between the 30% most deprived and 30% least deprived areas in Merton, and the gap is 3.4 years for women.

Healthy life expectancy at birth in males is 65.4 years and 66.3 years in females, therefore many residents are living a considerable proportion of their lives with ill health. The gap between the 30% most and 30% least deprived areas is also significant: 9.4 years for men, 9.3 for women so someone living in a deprived ward in the east of the borough is likely to spend more than 9 years more of their life in poor health than someone in a more affluent part of the borough, which will impact on the last years of working life, on family life and on a healthy and fulfilling retirement.

Economic factors are highly correlated with health outcomes, and socio-economic status is a major determinant of both life expectancy and healthy life expectancy. The 2015 IMD (Index of Multiple Deprivation) score shows that Merton as a whole is less deprived (14.9) compared to London (23.9) and England (21.8). However, east Merton has an average IMD score of 21.1 compared to west Merton which is 8.2.

Socio-economic status

The 2015 IMD (Index of Multiple Deprivation) score shows that Merton as a whole is less deprived (14.9) compared to London (23.9) and England (21.8). However, east Merton has an average IMD score of 21.1 compared to west Merton which is 8.2.

Wards in Merton split by deprivation decile

The table below shows the wards in Merton split by deprivation decile, based on the 2015 IMD deciles.

Decile	Ward name	Locality
1	-	-
2	-	-
3	Cricket Green	East
4	Figge's Marsh	East
	Lavender Fields	East
	Pollards Hill	East
	Ravensbury	East
	St Helier	East
5	Longthornton	East
6	Colliers Wood	East
	Graveney	East
7	Abbey	East
8	Lower Morden	West
	Raynes Park	West
	Trinity	West
	West Barnes	West
9	Cannon Hill	West
	Dundonald	West
	Hillside	West
	Merton Park	West
	Wimbledon Park	West
10	Village	West

} 30% Most Deprived

} 30% Least Deprived

Lower incomes and lower employment are bad for health. Being in work is generally good for health, although good working environments are important. In 2017, 3.4% of the working age population (16-64) claimed out of work benefits in Merton, which equates to 140,000 people; however rates are significantly higher in the east of the borough (4.7%), compared to west Merton (1.9%), and although the Merton average is lower than London (4%) and England (3.7%), these east Merton rates are higher than the regional and national figures. In 2015 in Merton, the employment rate was 78.8%, which is higher than London (72.9%), England (73.9%) and all statistical and geographical neighbours with the exception of Richmond and equal to Wandsworth.⁸ Between 2010 and 2016 there has been a 28.2% rise in the number of jobs available in Merton, from 78,000 to 100,000 jobs. Job density – the number of jobs available per

resident of working age – is also rising in Merton; however residents can and do travel out of Merton for work. A number of disabled working age Merton residents receive benefit support. In November 2016, 900 disabled Merton residents claimed benefits. This equates to 0.7%, which is the same as London.

Merton along with most London Boroughs is currently failing its annual legal air quality targets for both NO₂ and Particulates (PMs); this problem is most severe around the major transport routes. There is emerging evidence that schools in London which are worst affected by air pollution are in the most deprived areas, meaning that poor children and their families are exposed to multiple health risks.

Around 17.3% of adults, aged 19+ are doing less than 30 minutes of moderate intensity physical activity a week (2016/17). This is a lower proportion than London (22.9%) and England (22.2%), but still equates to around 28,000 people. The latest figures include adults from the age of 19 whereas previous data included those from the age of 16, therefore it is not possible to compare the two to identify trend. A worrying proportion (56.7%) of adults in Merton aged 18 and over are overweight or obese (2016/17). This has fallen slightly from 2015/16, but equates to over 90,000 people, and is a higher proportion of the population than London (55.2%) but lower than England (61.3%).

4,500 primary school children (aged 4-11) are estimated to be overweight or obese (excess weight). One in 5 children entering reception are overweight or obese and this increases to 1 in 3 children leaving primary school in Year 6 who are overweight or obese. The gap in levels of obesity between the east and the west of the borough is currently 10% (2013/14-2015/16), and increasing. This significant health inequality affects children's health and potentially their life chances. There are also ethnic variations in obesity prevalence; nationally, evidence indicates that a child is more likely to have excess weight if they are from a BAME background. However, there is no straightforward relationship between obesity and ethnicity, with a complex interplay of factors.

In terms of Merton residents living with a disability, an estimated 10.8% of people in Merton were diagnosed with a long-term illness, disability or medical condition in 2014/15. This is lower than London (12.6%) and England (14.1%). In 2015, 13.5% of Merton 16-64 year olds were recorded as Equalities Act core disabled or work limiting disabled, which is lower than England (19.2%) but more similar to London (16.1%) and comparators. It is estimated that 10.1% of Merton's working

age population (16-64 years) population have a physical disability (14,000 people) which is slightly higher than London (9.9%) but lower than England (11.1%). There are just over 400 adults in Merton recorded with a learning disability in 2016/17, 313 of whom live in stable and appropriate accommodation. This is three quarters (75.2%) of Merton's population with a learning disability and is higher than London (71.3%) but slightly lower than England (76.2%).¹⁰ There are a variety of factors that affect people's ability to live independently with a disability, such as access to education, employment and community; including planning, accessibility and transport.

Physical disability

Level of disability	Age	2018	2025	Percentage change
Moderate	18-64	10,120 (7.3%)	10,960 (7.5%)	8% increase
Serious	18-64	2,870 (2.1%)	3,181 (2.2%)	11% increase

Visual impairment

Level of disability	Age	2018	2025	Percentage change
Moderate or severe	65+	2,290 (8.7%)	2,648 (8.9%)	16% increase
Serious	18-64	90 (0.1%)	95 (-.1%)	6% increase

Hearing loss

Level of disability	Age	2018	2025	Percentage change
Some hearing loss	18-64	11,540 (8.3%)	12,970 (8.9%)	12% increase
Severe hearing loss	18-64	761 (0.5%)	837 (0.6%)	10% increase
Some hearing loss	65+	15,760 (60.2%)	18,080 (60.7%)	15% increase
Severe hearing loss	65+	2,073 (7.9%)	2,372 (8.0%)	14% increase

Learning disability Age	2018	2025	Percentage change
18-64	3,390 (0.4%)	3,550 (0.4%)	5% increase
65+	545 (2.1%)	621 (2.1%)	14% increase

Daily activities, 65 and over

Over half of people in Merton aged 65 and over are not limited in daily activities. Merton shows a higher score for daily activities not limited than London (48%) and England (48%).

Level of limitation (daily activities, 65 years and over))	Percentage
Not limited	50%
Limited a little	27%
Limited a lot	23%

Source: The 9 Protected Characteristics, Merton. Available from: <https://www2.merton.gov.uk/9%20PC%20July%202018%20Final.pdf>

Religion or belief

Religion or belief	% of total population
Christian	56.1
Muslim	8.1
Hindu	6.1
Buddhists	0.9
Jewish	0.4
Sikh	0.2
Not religious	20.6

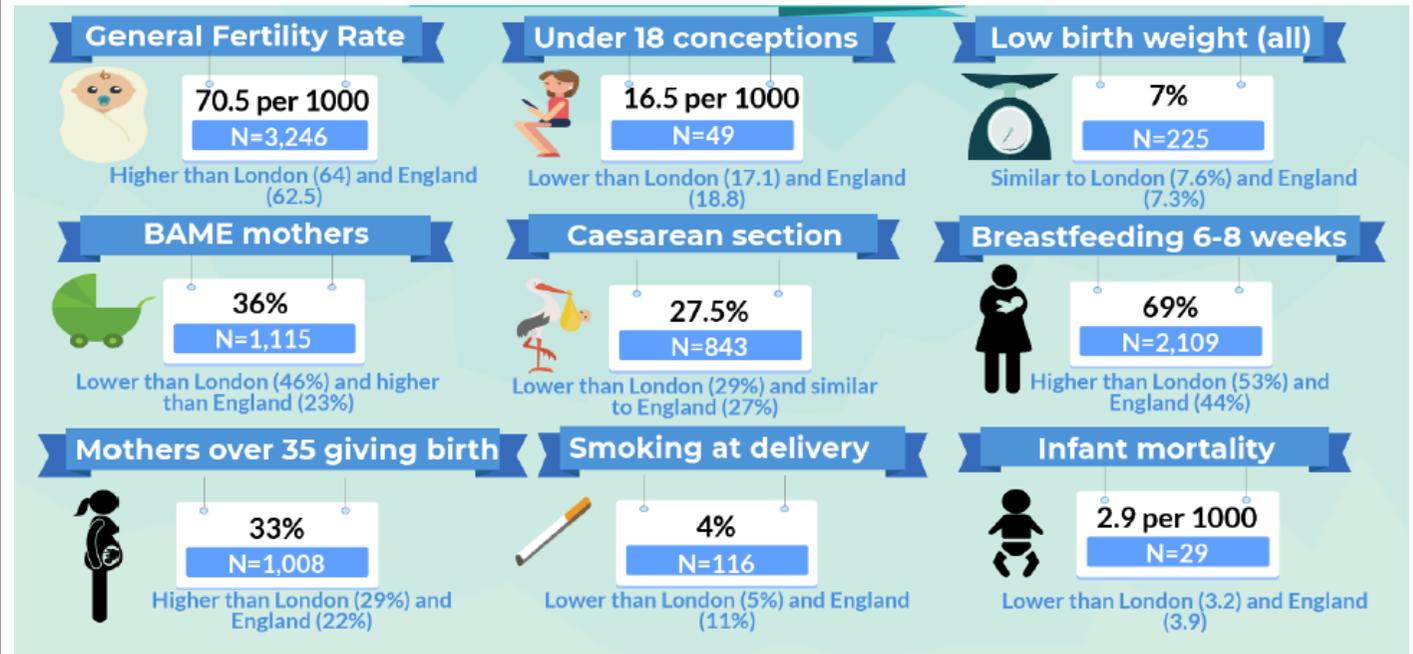
Source: GLA 2016-based demographic projections round, housing led model

Sexual orientation

From the 2014 Integrated Household Survey, 2.6% of London’s population answered Lesbian, Gay, Bisexual or Transgender as their sexual identity. This would equate to approximately 5500 people in Merton.

Pregnancy and maternity

The following infographics show data on pregnancy and maternity in Merton.



Source: The 9 Protected Characteristics, Merton. Available from: <https://www2.merton.gov.uk/9%20PC%20July%202018%20Final.pdf>

Marriage and civil partnership

2011 Census data shows us that a majority of Merton’s population were either single (40%, lower than London at 44%) or married (45%, higher than London at 40%). By 2018, the number of Civil

	Partnerships is expected to have risen considerably, however the exact numbers will not be shown until the 2021 Census.																					
	<table border="1"> <thead> <tr> <th>Status</th> <th>Number</th> <th>Percentage of total population</th> </tr> </thead> <tbody> <tr> <td>Married</td> <td>72,157</td> <td>45%</td> </tr> <tr> <td>Single</td> <td>64,689</td> <td>40%</td> </tr> <tr> <td>Divorced</td> <td>11,083</td> <td>7%</td> </tr> <tr> <td>Widowed</td> <td>8,187</td> <td>5%</td> </tr> <tr> <td>Separated</td> <td>4,173</td> <td>2%</td> </tr> <tr> <td>Civil Partnership</td> <td>551</td> <td>1%</td> </tr> </tbody> </table>	Status	Number	Percentage of total population	Married	72,157	45%	Single	64,689	40%	Divorced	11,083	7%	Widowed	8,187	5%	Separated	4,173	2%	Civil Partnership	551	1%
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4. Is the responsibility shared with another department, authority or organisation? If so, who are the partners and who has overall responsibility?	<p>Yes. Responsibility is shared with the following departments, organisations and partners. Public Health, NHS, Future Merton, Highways and Transportation, Planning, Mayor of London, TfL, transport operators, Parking Services, Environmental Health.</p> <p>The council has a duty under the Local Government Act 2000 to promote the social economic and environmental wellbeing of its residents. The proposals meet a number of these duties. We are mindful that whilst other partners have similar duties to work with us on our objectives, Merton Council has overall responsibility for setting parking charges within its jurisdiction.</p>																					

Stage 2: Collecting evidence/ data

5. What evidence have you considered as part of this assessment?

Provide details of the information you have reviewed to determine the impact your proposal would have on the protected characteristics (equality groups).

The Council acknowledges that convenient parking should be provided for residents to enable them to park near their homes, where practicable, and parking provision is also necessary to meet the needs of people who have no other alternative other than to use their vehicle e.g. individuals with disabilities.

The November 2018, December 2018, January 2019 and June 2019 Cabinet reports set out the Public Health, Air Quality and sustainable Transport – a strategic approach to parking charges which set out the proposals in detail, specifically the contribution appropriate tariffs can make in contributing to the objectives.

The key evidence can be found at:

January 2019

<https://democracy.merton.gov.uk/documents/s26251/Reference%20from%20scrutiny%20-%20strategic%20approach%20to%20parking%20charges.pdf>

December 2018,

<https://democracy.merton.gov.uk/documents/s25841/Emmissions%20public%20health%20and%20air%20quality%20a%20review%20of%20parking%20charges%20%20002.pdf>

November 2018,

<https://democracy.merton.gov.uk/documents/s25352/Emmissions%20public%20health%20and%20air%20quality%20a%20review%20of%20parking%20charges%20v6.pdf>

A number of key factors were considered in the review of on and off-street parking and permits, which included:

- (i) Ease of access to public transport (PTAL)
- (ii) Air Quality hotspots
- (iii) Areas of high congestion
- (iv) Enforcement requirements

This evidence was considered in light of the Merton profile detailed in section 3 above.

In order to fully understand how the proposals would affect users and residents, the Council undertook a comprehensive consultation exercise to gain the views of residents and stakeholders. This enabled the Council to make informed decisions and to develop the proposed policies.

Merton is committed to undertaking comprehensive consultation to gain the views of residents and stakeholders. This enables the Council to make informed decisions and to develop our policies.

The Parking Charges consultation commenced on Friday 29th March and ended Sunday 5th May 2019. As this consultation formed part of a statutory consultation process, there were a number of legal obligations, as well as a commitment to bringing the proposals to as wide an audience as possible.

To ensure the council could generate as much feedback as possible, representations were invited in writing via the web page, or by email to a dedicated email box. In addition, an online survey was available which asked prescribed questions and tick box responses, which were recorded. Circa 3,000 representations were received. Due to the number of responses received, the council extended its review period to the 18th June 2019. This ensured that full consideration was given to all representations, and to allow any further comments from the resident and business associations to be included.

The Council published a 2-page feature article in My Merton, which was delivered to every household within the borough in March/April 2019 to align with the consultation period. As well as the online consultation and the My Merton article the council also attended Community Forum meetings during the period of the consultation; followed the statutory Traffic Management Order process of displaying notices in roads within all of the CPZ areas, on pay, display machines, and in all council owned car parks, in addition a statutory notice was placed in the newspaper.

Copies of all proposals and background papers were made available on deposit at all libraries and at the Civic Centre for public inspection/reference. We consulted with statutory and non-statutory consultees. On the council's home page, we displayed a link to the consultation web pages. The web pages gave full details of the proposal along with background papers and reports. The pages also included a section, which aimed to address frequently asked questions.

A number of statutory bodies were consulted as part of the Traffic Management Order making process. The only response received was from the Metropolitan Police who raised no objections.

Stage 3: Assessing impact and analysis

6. From the evidence you have considered, what areas of concern have you identified regarding the potential negative and positive impact on one or more protected characteristics (equality groups)?

Protected characteristic (equality group)	Tick which applies		Tick which applies		Reason Briefly explain what positive or negative impact has been identified
	Positive impact		Potential negative impact		
	Yes	No	Yes	No	
Age	X			X	<p>Positive Impact</p> <p>The proposals support the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.</p> <p>The proposals support the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by ‘making the healthy choice the easy choice’.</p> <p>In setting out its measures of success, the new charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets - to benefit residents and businesses alike.</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of</p>

				<p>vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p><u>Potential Negative Impact</u></p> <p>None identified. However please refer to ‘Disability’ below, as there is an acceptance that elderly people are more likely to be infirm, have mobility problems or have a disability than younger people.</p>
Disability	X		X	<p><u>Positive Impact</u></p> <p>The proposals support the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.</p> <p>The proposals support the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by ‘making the healthy choice the easy choice’.</p> <p>In setting out its measures of success, the new charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets - to benefit residents and businesses alike.</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p>

					<p><u>Potential Negative Impact</u></p> <p>Negative Impact: Any increase in parking charges has the potential to negatively impact on those with a disability.</p> <p>Note. There is an acceptance that elderly people are more likely to be infirm, have mobility problems, but may not be considered disabled. For the purpose of this EIA the mitigation for problems commonly caused by age such as being infirm or mobility problems have been addressed under disability.</p>
Gender Reassignment	X			X	<p><u>Positive Impact</u></p> <p>The proposals support the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.</p> <p>The proposals support the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by ‘making the healthy choice the easy choice’.</p> <p>In setting out its measures of success, the new charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets - to benefit residents and businesses alike.</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p>

					<p><u>Potential Negative Impact</u></p> <p>None identified</p>
<p>Marriage and Civil Partnership</p>	X			X	<p><u>Positive Impact</u></p> <p>The proposals support the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.</p> <p>The proposals support the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by ‘making the healthy choice the easy choice’.</p> <p>In setting out its measures of success, the new charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets - to benefit residents and businesses alike.</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p><u>Potential Negative Impact</u></p> <p>None identified</p>
<p>Pregnancy and Maternity</p>	X		X		<p><u>Positive Impact</u></p>

					<p>The proposals support the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.</p> <p>The proposals support the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by 'making the healthy choice the easy choice'.</p> <p>In setting out its measures of success, the new charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets - to benefit residents and businesses alike.</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p><u>Potential Negative Impact</u></p> <p>A number of respondents stated that living near public transport does not mean it is easily accessible for all e.g. lack of lifts or escalators, not user friendly for families, or those needing to carry buggies.</p>
Race	X			X	<p><u>Positive Impact</u></p> <p>The proposals support the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern,</p>

					<p>efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.</p> <p>The proposals support the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by 'making the healthy choice the easy choice'.</p> <p>In setting out its measures of success, the new charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets - to benefit residents and businesses alike.</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p><u>Potential Negative Impact</u></p> <p>None identified</p>
Religion/ belief	X			X	<p><u>Positive Impact</u></p> <p>The proposals support the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.</p> <p>The proposals support the Public Health vision to protect and improve physical and mental health outcomes for the whole</p>

				<p>population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by ‘making the healthy choice the easy choice’.</p> <p>In setting out its measures of success, the new charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets - to benefit residents and businesses alike.</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p><u>Potential Negative Impact</u></p> <p>None identified</p> <p>During the course of the consultation, a local faith group submitted a petition and stated that the proposed new charges will affect a number of people attending their prayers. Whilst the council notes this position it does not feel that the proposals disproportionately affect the protected characteristic of religion under these circumstances.</p> <p>The council considers that the impact is proportionate to the legitimate aim sought to be achieved through the policy.</p>
Sex (Gender)	X			<p><u>Positive Impact</u></p> <p>The proposals support the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern,</p>

					<p>efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.</p> <p>The proposals support the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by ‘making the healthy choice the easy choice’.</p> <p>In setting out its measures of success, the new charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets - to benefit residents and businesses alike.</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p><u>Potential Negative Impact</u></p> <p>None identified</p>
Sexual orientation	X			X	<p><u>Positive Impact</u></p> <p>The proposals support the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.</p> <p>The proposals support the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart</p>

				<p>of the strategy is the concept that the environment is a key driver for health. It can be summarised by ‘making the healthy choice the easy choice’.</p> <p>In setting out its measures of success, the new charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets - to benefit residents and businesses alike.</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p><u>Potential Negative Impact</u></p> <p>None identified</p>
Socio-economic status	X		X	<p><u>Positive Impact</u></p> <p>The proposals support the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.</p> <p>The proposals support the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by ‘making the healthy choice the easy choice’.</p> <p>In setting out its measures of success, the new charging policy aims to deliver reduced car ownership and usage across the borough,</p>

				<p>encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets - to benefit residents and businesses alike.</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p><u>Potential Negative Impact</u></p> <p>Any increase in parking charges has the potential to negatively impact on those from certain socio economic backgrounds.</p> <p>Significant social inequalities exist within Merton. The eastern half has a younger, less affluent and more ethnically mixed population. The western half is less ethnically mixed, older and more affluent. Largely as a result, people in East Merton have worse health and shorter lives.</p> <p>The improvement action plan below sets out a number of mitigations to address the above points.</p> <p>The council considers that the impact is proportionate to the legitimate aim sought to be achieved through the policy.</p>
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7. If you have identified a negative impact, how do you plan to mitigate it?

The mitigations for disability, pregnancy & maternity and socio-economic status are set out in the Action Plan below.

Stage 4: Conclusion of the Equality Analysis

8. Which of the following statements best describe the outcome of the EA (Tick one box only)

Please refer to the guidance for carrying out Equality Impact Assessments is available on the intranet for further information about these outcomes and what they mean for your proposal

- Outcome 1** – The EA has not identified any potential for discrimination or negative impact and all opportunities to promote equality are being addressed.
- Outcome 2** – The EA has identified adjustments to remove negative impact or to better promote equality.
- Outcome 3** – The EA has identified some potential for negative impact or some missed opportunities to promote equality and it may not be possible to mitigate this fully.
- Outcome 4** – The EA shows actual or potential unlawful discrimination.

Stage 5: Improvement Action Pan

8. Equality Analysis Improvement Action Plan template – Making adjustments for negative impact

Negative impact/ gap in information identified in the Equality Analysis	Action required to mitigate	HOW WILL YOU KNOW THIS IS ACHIEVED? E.G. PERFORMANCE MEASURE/ TARGET)	By when	Existing or additional resources?	Lead Officer	Action added to divisional/ team plan?
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<p>Disability</p>	<p>A number of disabled working age Merton residents receive benefit support. In November 2016, 900 disabled Merton residents claimed benefits. This equates to 0.7%, which is the same as London.</p> <p>Merton is committed to supporting its residents that have mobility issues, and there are a number of ways we currently support this objective.</p> <p>Merton is a member of the national Blue Badge scheme. The Blue Badge provides a range of parking and other motoring concessions for people who are registered blind or have severe mobility problems. Blue Badge holders can park free of charge in any Merton disabled parking bay, pay & display and shared use bay or permit holder bay.</p> <p>Later this year the Blue Badge eligibility scheme will be extended to those with a wide range of mental health issues that affect their mobility. This will extend our current provision to support additional residents within the Borough.</p> <p>A Blue Badge holder in Merton is entitled to apply for a free carer permit under certain conditions. This is to further support those residents with mobility issues and in need of regular support and care. The</p>	<p>Customer feedback</p> <p>Number of applications of Blue Badge & free carer permits</p> <p>Number of Applications For disabled bays</p> <p>Access improvements to public transport infrastructure</p> <p>Ensuring we have suitable accessibility options (channels) for disabled users who wish to make payments and</p>	<p>Sept 2019</p>	<p>Existing</p>	<p>Ben Stephens</p>	<p>Yes</p>
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	<p>carer permit eligibility is based on being a Blue Badge holder.</p> <p>Any increase in charges is offset by eligibility for a Blue Badge, which provides free on street parking at many locations, including on single and double yellow lines.</p> <p>Those with disabilities are also able to apply for the creation of a disabled bay.</p> <p>Respondents to the survey recorded comments regarding accessibility issues in relation to public transport.</p> <p>The Council works closely with TfL and Network Rail to ensure that the Highway infrastructure accommodates the efficiency of public transport services. This includes accessibility.</p>	<p>access assistance with regard to the service</p> <p>Civil enforcement officers and parking staff will all be trained to help administer the new Blue Badge regulations and assist those with mental health issues including dementia friendly training</p>				
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<p>Pregnancy & Maternity</p>	<p>A number of respondents stated that living near public transport does not mean it is easily accessible for all e.g. lack of lifts or escalators, not user friendly for families, or those needing to carry buggies.</p> <p>The Council works closely with TfL and Network Rail to ensure that the Highway infrastructure accommodates the efficiency of public transport services. This includes accessibility.</p> <p>Merton is aiming to ensure that every resident has access to car club vehicles. There are 193,500 car club members in London and around ten car clubs. Transport for London (TfL) has committed to aiming for one million members by 2025. They offer a convenient and affordable service, while at the same time reducing overall car usage.</p> <p>Car clubs can provide you with an alternative means of accessing a car when you need one, without all the cost or hassle of owning one yourself. You can find car club cars parked on street throughout Merton. There are three car club companies available to the public in the borough, Bluecity, Zipcar and other TfL operators.</p>	<p>Access improvements to public transport infrastructure</p> <p>Increased number of car club members</p> <p>Reduction in individual car ownership</p>	Sept 2019	Existing	Ben Stephens	Yes
<p>Socio Economic</p>	<p>Significant social inequalities exist within Merton. The eastern half has a younger, less affluent and more ethnically mixed population. The western half is less ethnically mixed, older and more affluent. Largely as a result, people in East Merton have worse health and shorter lives.</p> <p>Healthy life expectancy at birth in males is 65.4 years and 66.3 years in females, therefore many residents are living a considerable proportion of their lives with ill health. The gap between the 30% most and 30% least deprived areas is also significant: 9.4 years for men, 9.3 for women so someone living in a deprived ward in the east of the borough is likely to spend more than 9 years more of their life in poor health than someone in a more affluent part of the borough, which will impact on the</p>	<p>Customer Feedback</p> <p>Increased Number of new car club members</p> <p>Reduction in number of permits</p> <p>Number of bikes hired & cycle journeys made</p>	Sept 2019	Existing	Ben Stephens	Yes

	<p>last years of working life, on family life and on a healthy and fulfilling retirement.</p> <p>Economic factors are highly correlated with health outcomes, and socio-economic status is a major determinant of both life expectancy and healthy life expectancy. The 2015 IMD (Index of Multiple Deprivation) score shows that Merton as a whole is less deprived (14.9) compared to London (23.9) and England (21.8). However, East Merton has an average IMD score of 21.1 compared to West Merton which is 8.2.</p> <p>Any increase in parking charges has the potential to negatively impact those on lower incomes, however in mitigation, it is recognised that the poorer areas of the borough do not have as good transport links as the more affluent areas of the borough, and in recognition of this, any increases in these areas would be less. For example, Wimbledon has a wider range of transport options than Colliers Wood and South Wimbledon, which in turn have more transport options than for example Mitcham. This is presented in the form of 'Public Transport Accessibility Levels' as set out by TfL and formed part of the review.</p> <p>It is therefore easier in principle for a person living in Wimbledon Town Centre to use alternative sustainable or active modes of transport, compared to residents in the east of the borough, where the 'need' to own a car could be argued as being higher.</p> <p>Merton is aiming to ensure that every resident has access to car club vehicles. There are 193,500 car club members in London and around ten car clubs. Transport for London (TfL) has committed to aiming for one million members by 2025. They offer a convenient and affordable service, while at the same time reducing overall car usage.</p> <p>Car clubs can provide you with an alternative means of accessing a car when you need one, without all the cost or hassle of owning one yourself. You can find car club</p>	<p>We are reviewing the introduction of 1 and/or 3 monthly payment options, to assist those who cannot afford a 6 or 12 month permit in one payment</p>				
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cars parked on street throughout Merton.

There are three car club companies available to the public in the borough, Bluecity, Zipcar and other TfL operators.

For example, research commissioned by Zipcar in 2016 indicated that the average annual cost of owning and running a car in London is approximately £3,500. The proposed increase in permit prices would be equivalent to around 0.14% - 2.5% of that average annual cost of owning/running a car in London, dependent on the location of the CPZ.

There are a number of instances where charges have been reduced, particularly in respect of Electric Vehicles, which have a positive impact on health.

Season tickets for local residents and workers have also been subjected to greater reductions.

An alternative cheaper, healthier form of transportation and one that a number of respondents highlighted was that more people would cycle if they were able to hire bikes in Merton.

There is significant potential to encourage residents to cycle more, especially for short commuter and leisure trips. The council is therefore working with TfL and neighbouring boroughs to facilitate a dock-less cycle hire scheme in Merton. This will enable residents to collect a hire bike from a number of designated cycle collection/drop off points across the borough and cycle to their destination.

It is likely that a future Merton cycle hire scheme will operate from dedicated, predominately on-street collection/drop off bays. The council would particularly welcome operators that include electric bikes within their offer to help reach a wider mix of users, who might not otherwise cycle.

Officers have reviewed the equity of the proposals and accept that there will be some residents who may be negatively impacted. However, in light of the mitigation

	set out above the level of impact is assessed as likely to be low. The council considers that the impact is proportionate to the legitimate aim sought to be achieved through the policy.					
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Note that the full impact of the decision may only be known after the proposals have been implemented; therefore, it is important the effective monitoring is in place to assess the impact.

Stage 6: Reporting outcomes

10. Summary of the equality analysis

This section can also be used in your decision-making reports (CMT/Cabinet/etc.) but you must also attach the assessment to the report, or provide a hyperlink

This Equality Analysis has resulted in an Outcome **2** Assessment

Please include here a summary of the key findings of your assessment.

A review of the proposed charges by Parking Services for on street pay and display, off street pay and display and permit to help deliver key strategic council priorities including public health, air quality and sustainable transport

There are both negative and positive impacts identified by the EIA.

Positive Impact

The proposals support the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.

The proposals support the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by ‘making the healthy choice the easy choice’.

In setting out its measures of success, the new charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets - to benefit residents and businesses alike.

This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.

We have also identified a number of negative impacts, these include;

- Disability - Any increase in parking charges has the potential to negatively impact on those with a disability.
- Note. There is an acceptance that elderly people are more likely to be infirm, have mobility problems, but may not be considered disabled. For the purpose of this EIA the mitigation for problems commonly caused by age such as being infirm or mobility problems have been addressed under disability. Age – referenced with disability, as there is an acceptance that elderly people are more likely to be infirm, have mobility problems or have a disability than younger people.
- Pregnancy and maternity - A number of respondents stated that living near public transport does not mean it is easily accessible for all e.g. lack of lifts or escalators, not user friendly for families, or those needing to carry buggies.
- Socio economic status - Any increase in parking charges has the potential to negatively impact on those from certain socio economic backgrounds.
Significant social inequalities exist within Merton. The eastern half has a younger, less affluent and more ethnically mixed population. The western half is less ethnically mixed, older and more affluent. Largely as a result, people in East Merton have worse health and shorter lives.

During the course of the consultation, a local faith group submitted a petition and stated that the proposed new charges will affect a number of people attending their prayers. Whilst the council notes this position it does not feel that the proposals disproportionately affect the protected characteristic of religion under these circumstances.

Officers have reviewed the equity of the proposals and accept that there will be some residents who may be negatively impacted. However, in light of the mitigations set out above the level of impact is assessed as likely to be low. The council considers that the impact is proportionate to the legitimate aim sought to be achieved through the policy.

What course of action are you advising as a result of this assessment?

Section 5 – Improvement Action Plan sets out the actions and timescales proposed to be undertaken.

Stage 7: Sign off by Director/ Head of Service			
Assessment completed by	Add name/ job title	Signature:	Date:
Improvement action plan signed off by Director/ Head of Service	Add name/ job title	Signature:	Date:

Appendix B1

Merton Council - call-in request LIBERAL DEMOCRAT GROUP

1. Decision to be called in: (required)

Public health, air quality and sustainable transport – a strategic approach to parking charges 4

1. That the responses made during the formal consultation process alongside any further references and considerations raised by the Sustainable Communities Overview and Scrutiny Panel be considered.
2. That further to the consultation process, the proposed charges set out in appendix 7 of the Cabinet report, including the following amendments, be agreed:
 - i. Controlled Parking Zones: VNE, VNS, VN, VQ, VSW, VSW1, and VSW2, be re-categorised from Tier 1 to Tier 2 (as set out in Appendices 7 d & e of the Cabinet report)
 - ii. That off street car parking charges in Queens Road Wimbledon and St Georges car park are reduced from the current £3 flat rate fee from 6.00pm to 11 pm to a £2 flat fee (as set out in Appendix 7 b of the Cabinet report).
 - iii. The proposed charges for on street parking in appendix 7 (a) of the Cabinet report are approved.
 - iv. The proposed charges for off street parking in appendix 7 (b) of the Cabinet report are approved.
 - v. The proposed charges for Permits set out in appendix 7 (c-f) of the Cabinet report are approved.
3. That authority be delegated to the Director of Environment and Regeneration, in consultation with the Cabinet Member for Regeneration, Housing and Transport, to finalise any operational matters in relation to the implementation of the proposals set out in the Cabinet report.
4. That the changes are introduced with effect from 1st September 2019, or as soon as practicable thereafter.

2. Which of the principles of decision making in Article 13 of the constitution has not been applied? (required)

Required by part 4E Section 16(c)(a)(ii) of the constitution - tick all that apply:

(a) proportionality (i.e. the action must be proportionate to the	x
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desired outcome);	
(b) due consultation and the taking of professional advice from officers;	
(c) respect for human rights and equalities;	x
(d) a presumption in favour of openness;	
(e) clarity of aims and desired outcomes;	x
(f) consideration and evaluation of alternatives;	x
(g) irrelevant matters must be ignored.	

3. Desired outcome

Part 4E Section 16(f) of the constitution- select one:

(a) The Panel/Commission to refer the decision back to the decision making person or body for reconsideration, setting out in writing the nature of its concerns.	x
(b) To refer the matter to full Council where the Commission/Panel determines that the decision is contrary to the Policy and/or Budget Framework	
(c) The Panel/Commission to decide not to refer the matter back to the decision making person or body *	
* If you select (c) please explain the purpose of calling in the decision.	

4. Evidence which demonstrates the alleged breach(es) indicated in 2 above (required)

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

With regards to paras 2(a), (e) and (f):

The logic of the administration's proposals is that they will "deliver reduced car ownership and usage across the borough" – that's the mechanism by which these proposals are supposed to lead to less air pollution.

As noted at the Sustainable Communities Scrutiny Panel on 27 June:

- No modelling has been carried out in relation to how many vehicles people will give up, nor how many fewer car trips there might be, as a result of these proposals. Nor the ratio between the two.
- No specific evidence has been presented to cabinet that increases in residents' parking charges result in reduced car ownership.
- There was an indication at Scrutiny that there was no specific evidence with regards to the effectiveness of the pricing model chosen.

Alternative courses of action have not been sufficiently identified and examined. This is highlighted by the fact that the administration itself has a review into the diesel levy and emissions based charges outstanding, and that the air quality action plan recommends emissions based charging.

With regards to para 2(c):

As noted at the Sustainable Communities Scrutiny Panel on 27 June:

- No equality groups have been directly consulted with, with regards to the proposals or the mitigation measures set out in the 3 Equality Assessments. This seems contrary to the Equality Assessment Flowchart, which requires officers to "Consult appropriate stakeholders as part of the review" when they are carrying out the review under qu 8 "Draw up a list of areas of concern. Review ways to remove or minimise the negative impact/discrimination".
- From conversations with officers concerning the equality assessments, there is an indication that part of Equality Assessment 2 (presented to the Scrutiny Panel) has been changed to better reflect officers' views on the areas of concern, but this may have changed the emphasis of the risks as far as councillors are concerned.

5. Documents requested

Consultation materials sent to equality group stakeholders

Evidence relied on to formulate policy

Consideration of alternatives

6. Witnesses requested

Appropriate cabinet member

Relevant officers

Representatives of appropriate stakeholders to discuss the mitigation of risks identified in the Equality Assessment

7. Signed (not required if sent by email):

Councillor Anthony Fairclough, Councillor Eloise Bailey and Councillor Paul Kohler confirmed signatories by email

8. Notes

Call-ins must be supported by at least three members of the Council
(Part 4E Section 16(c)(a)(i))

The call in form and supporting requests must be received by by 12 Noon on the third working day following the publication of the decision
(Part 4E Section 16(c)(a)(iii)).

The form and/or supporting requests must be sent **EITHER** by email from a Councillor's email account (no signature required) **OR** as a signed paper copy
(Part 4E Section 16(c)(a)(iv)).

For further information or advice contact the Democratic Services Manager on 020 8545 3361

Merton Council - call-in request form CONSERVATIVE GROUP

1. Decision to be called in: (required)

<i>Public health, air quality and sustainable transport - a strategic approach to parking charges</i>

2. Which of the principles of decision making in Article 13 of the constitution has not been applied? (required)

Required by part 4E Section 16(c)(a)(ii) of the constitution - tick all that apply:

(a) proportionality (i.e. the action must be proportionate to the desired outcome);	<input checked="" type="checkbox"/>
(b) due consultation and the taking of professional advice from officers;	<input type="checkbox"/>
(c) respect for human rights and equalities;	<input checked="" type="checkbox"/>
(d) a presumption in favour of openness;	<input checked="" type="checkbox"/>
(e) clarity of aims and desired outcomes;	<input checked="" type="checkbox"/>
(f) consideration and evaluation of alternatives;	<input checked="" type="checkbox"/>
(g) irrelevant matters must be ignored.	<input type="checkbox"/>

3. Desired outcome

Part 4E Section 16(f) of the constitution- select one:

(a) The Panel/Commission to refer the decision back to the decision making person or body for reconsideration, setting out in writing the nature of its concerns.	<input checked="" type="checkbox"/>
(b) To refer the matter to full Council where the Commission/Panel determines that the decision is contrary to the Policy and/or Budget Framework	<input type="checkbox"/>
(c) The Panel/Commission to decide not to refer the matter back to the decision making person or body *	<input type="checkbox"/>
* If you select (c) please explain the purpose of calling in the decision.	<input type="checkbox"/>

4. Evidence which demonstrates the alleged breach(es) indicated in 2 above (required)

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

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

This decision to increase the cost of CPZ permits has not been an open decision informed by evidence, but one taken behind closed doors, without proper scrutiny, and without any consideration of the alternatives.

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

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

The decision to proceed with the CPZ and parking bay increase is disproportionate to the desired outcome. The claimed outcome that a reduction in emissions will occur as residents will switch away from private vehicles is not supported by credible evidence. The only credible assertion in the **Public health, air quality and sustainable transport - a strategic approach to parking charges** is that the revenue received by the council will rise by almost £2,000,000 across the borough.

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

This policy as proposed is a blunt instrument which doesn't appear necessarily to target the behaviour which is causing the borough's air pollution problems. The levy simply penalises residents who live in a CPZ regardless of how much they actually drive their vehicle.

(c) respect for human rights and equalities;

No due regard has been given as to the impact this would have on the elderly, it was acknowledged by the cabinet member and the director that specific elderly welfare groups such as AgeUK Merton, the Wimbledon Guild etc. have not been contacted or made duly aware of these proposals. Unlike the direct contact made by the Council to the business community and some residents associations.

Page 13 of the revised and altered EIA document shows that 50% of over 65s have some form of limitation to do daily activities. However this assessment then goes on to claim there is no negative impact on the elderly, and casually asserts that the proposed parking fees will be positive. We are not sure what evidence they have to back this up. Many require carers who will not be able to afford to pay large fees in every CPZ they visit. The director made an off the cuff remark at cabinet about carers being able to get a special permit but there is little to no detail on the website to advise on this or information that could be given to the elderly requiring carers.

The same impact assessment on page 16 claims the disability groups would receive a positive impact because of this proposal. But simultaneously states there

could be a negative impact on the disabled. It refers back to 'Age' and in that section it refers to 'Disability' in a circular loop without once outlining or acknowledging what the impact on these groups would be.

We would expect the council to contact and liaise with such groups as Merton CIL, Merton Vision etc. to assess the true impacts on these communities before making assertions of fact.

A further group, pregnancy and maternity, has not been factored in as to why residents at this stage of life wish to have a car. Use of a car is often the only way to get to the hospital as public transport could be difficult to access when heavily pregnant or with young child. The lack of step free access to railways and even buses does not help. The fact that it is difficult to reach the hospitals. The council needs to recognise that this group would be penalised by their need for a car. Also they are less likely to be able to hire vehicles whilst at this phase. Car Clubs are not the right solution for this group.

The council with this policy are actively discriminating against residents in Mitcham because their policy does nothing to help improve air quality or public health. The report only seeks to improve public health in areas of the borough already acknowledged to have better health levels. Your policy will condemn residents in Mitcham to worse air quality and will do nothing to help bridge the gap. In fact you are making it worse.

(d) a presumption in favour of openness;

This decision to increase the cost of CPZ permits has been taken and put to a consultation that will not have a bearing on the outcome of the decision. The current Cabinet Member has publicly stated at the Wimbledon Community Forum in March that 'it is a consultation not a referendum'.

Over 3,000 residents, numerous resident associations and many local businesses commented negatively during the consultation. No consideration has been given to their responses which support scrapping the charges. The council has therefore not listened to any group who have decided to engage with the consultation and has therefore displayed a close minded approach, and has shown that the decision has not been made through an open process of engagement.

The decision has been sent through the scrutiny process even though the decision has already been made in the Leader's Strategy Group and Cabinet in December. This was shown in the sustainable community Overview and Scrutiny Panel papers in January which showed the inclusion of the Parking Charges increase in the Budget papers which listed the £1.9 million charge increase per annum.

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

(e) clarity of aims and desired outcomes

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

worst affected areas of the borough.

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

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

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

The report does not make any real display of what desired outcomes would be other than trying to reduce the number of permits issued. There are no specific measures to define what reductions of emission are aimed for, what metrics on increased public transport use, and no indication of what metrics will be used to measure the increase in public health across the borough.

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

(f) consideration and evaluation of alternatives;

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

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

There is no explanation of how this solution came about, was it even in the labour manifesto at last year's council election and what other alternatives or ideas did the cabinet consider or not? Before settling on this solution what choice of options were there, or were they dismissed due to not providing the level of revenue needed to fill the budget gap.

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

5. Documents requested

All papers provided to the Director of Environment and Regeneration/Director of Corporate Services/ and relevant Cabinet Members prior to, during and subsequent to the decision making process on parking charges increase.

All emails, reports and associated documentation relating to the decision on parking charges provided to the relevant members, Leader of the Council,

Chief Executive, Director of Environment and Regeneration, Director of Corporate Services and other council officers.

Meeting notes of all meetings between officers / Cabinet Members and any third parties on the parking charges increase.

Any correspondence between the council and organisations lobbying on the parking charges increase.

The Equality Impact Assessment (or any other equalities analysis carried out) in relation to the parking charges increase.

The risk analysis conducted in relation to the parking charges increase.

Detailed financial analysis of the parking charges increase, and in particular the impact on council revenue over the medium term.

6. Witnesses requested

Cllr Martin Whelton, Cabinet Member for Regeneration, Parking and Transport

Cllr Tobin Byers Cabinet Member for Adult Social Care, Health and the Environment

Chris Lee, Director of Environment and Regeneration, LB Merton

Hannah Doody Director of Community and Housing, LB Merton

Dagmar Zeuner Director of Public Health, LB Merton

Paul Evans, Assistant Director of Corporate Government , LB Merton

Ben Stephens, Head of Parking Services, LB Merton

Jason Andrews Environmental Health Pollution Manager (Air Quality), LB Merton

Representative of Wimbledon Union of Residents' Associations (WURA)

Sally Gibbons, Chair of the Edge Hill Residents' Association

Representatives of The Alliance of British Drivers; the RAC Foundation; and the AA

Raynes Park West Wimbledon Residents Association

St Johns Area Residents association

Love Wimbledon

The Wimbledon East Hillside Resident Association (WEHRA)

South Ridgeway Residents Association

Wimbledon Park Residents Association

Battles Area Residents Association

The Wimbledon Society

North West Wimbledon Residents Association

Apostles Residents Association

Residents Association of West Wimbledon

AgeUK Merton

7. Signed (not required if sent by email):



Cllr Daniel Holden



Cllr David Dean



Cllr Nigel Benbow

8. Notes – see part 4E section 16 of the constitution

Call-ins must be supported by at least three members of the Council.

The call in form and supporting requests must be received by 12 Noon on the third working day following the publication of the decision.

The form and/or supporting requests must be sent:

- **EITHER** by email from a Councillor's email account (no signature required) to democratic.services@merton.gov.uk
- **OR** as a signed paper copy to the Head of Democracy Services, 7th floor, Civic Centre, London Road, Morden SM4 5DX.

For further information or advice contact the Head of Democracy Services on

020 8545 3864

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APPENDIX C

OFFICER RESPONSE TO THE CALL REQUESTS – PUBLIC HEALTH, AIR QUALITY AND SUSTAINABLE TRANSPORT – A STRATEGIC APPROACH TO PARKING CHARGES

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

With regards to paras 2(a), (e) and (f):

The logic of the administration's proposals is that they will "deliver reduced car ownership and usage across the borough" – that's the mechanism by which these proposals are supposed to lead to less air pollution.

As noted at the Sustainable Communities Scrutiny Panel on 27 June:

- No modelling has been carried out in relation to how many vehicles people will give up, nor how many fewer car trips there might be, as a result of these proposals. Nor the ratio between the two.*
- No specific evidence has been presented to cabinet that increases in residents' parking charges result in reduced car ownership.*
- There was an indication at Scrutiny that there was no specific evidence with regards to the effectiveness of the pricing model chosen.*

Alternative courses of action have not been sufficiently identified and examined. This is highlighted by the fact that the administration itself has a review into the diesel levy and emissions based charges outstanding, and that the air quality action plan recommends emissions based charging.

Officer response

The November 2018, December 2018, January 2019 and July 2019 Cabinet reports set out the Public Health, Air Quality and sustainable Transport – a strategic approach to parking charges which set out the proposals in detail, specifically the contribution appropriate tariffs can make in contributing to the objectives.

The key evidence can be found at:

July 2019

<https://democracy.merton.gov.uk/ieListDocuments.aspx?CIId=146&MIId=3396&Ver=4>

January 2019

<https://democracy.merton.gov.uk/documents/s26251/Reference%20from%20scrutiny%20-%20strategic%20approach%20to%20parking%20charges.pdf>

December 2018,

<https://democracy.merton.gov.uk/documents/s25841/Emmissions%20public%20health%20and%20air%20quality%20a%20review%20of%20parking%20charges%202%20002.pdf>

November 2018,

<https://democracy.merton.gov.uk/documents/s25352/Emmissions%20public%20health%20and%20air%20quality%20a%20review%20of%20parking%20charges%20v6.pdf>

These reports set out the key policy drivers and implementation plan to meet key objectives such as reduced air quality.

The council's 'Public health, air quality and sustainable transport – a strategic approach to parking charges' report sits alongside the councils Air Quality Action Plan (attached as Appendix C2) which lists over 70 key actions within the Borough to reduce harmful emissions.

The July 2019 Cabinet report talked to a number of key themes that had been highlighted in the consultation, one of which was parking demand and supply and how charging levels nudge motorists behaviours.

A number of comments and feedback suggested that there was no evidence to demonstrate that raising parking charges would reduce car use and lead to improved air quality. The council believes that there is evidence to show that the level of parking charges is likely to stimulate or nudge people into reducing car usage or removing their reliance on needing a car altogether.

The Canadian Parking Association produced a paper in 2015 titled The Value of Parking that looked at examples from a number of countries. This covers a wide range of points relating to the elasticity of demand for parking and the impact of fees on parking behaviour. The paper is available to read online at <https://canadianparking.ca/the-value-of-parking/>

Key points from this paper include:

“The importance of parking is widely recognised, but car drivers are reluctant to pay even a small amount of money for parking.”

Parking fees are an efficient way of regulating parking. Offering free parking will lead to undesirable effects. The pivotal point in this is the low elasticity of parking demand. Even though parking demand in general is inelastic (meaning that the percentage change in parking demand will be smaller than the percentage change in parking fees) there is still an unequivocal link that increased charges will lead to a reduced demand, even if this is not proportional.

Previous reports on price have tended to concentrate on commuter parking only, which has a higher rate of inelasticity. Only a minority of people who use commuter parking facilities would consider alternative forms of transport or not making the trip at all.

The report goes on to explain that there is also a difference in price elasticity between short and long-term effects. Car owners can adapt their long-term behaviour more easily than changing their habits on short-term notice. Long-term effects then can be more elastic than short term effects.

The report demonstrates that price elasticity for parking demand is strongly connected to the value that the car driver puts on certain types of trips (cross elasticity). Highly valued trips will still take place, even when the price is high (low elasticity). When the value of a trip is considered lower, a driver may sooner skip the trip or find another solution (higher elasticity). Trips for dining out, recreation and unplanned shopping are likely to benefit from the nudge effect of stimulating drivers to change or amend their behaviours. Emergency trips, by their very nature, are unexpected and likely to account for a small number of overall trips made each day.

Further examples of where increased charges have stimulated direct behavioural change include:

London Congestion charge – The congestion charge was the first of its kind in the world. There was no evidence to prove that it would be effective prior to its introduction, however its value and effectiveness have been scrutinised since. We know that in the first six months of operation of the charge, 60,000 less vehicle movements were recorded.

ULEZ – Since February 2017, when the Mayor announced the introduction of the T charge as a stepping stone for the ULEZ, there has been a reduction in the total number of vehicles seen in the Central London ULEZ Zone (around 11,000 fewer vehicles per day)

This latter point is illustrated in the following example where price increases led to a change in behaviour:

*Congestion charge in **central Stockholm** – Findings indicate that the congestion tax in central Stockholm reduced ambient air pollution by 5 to 10 percent. This policy-induced change in pollution has been associated with a significant reduction in the rate of urgent care visits for asthma among children 0 to 5 years of age. Our estimates show that permanent reductions in air pollution from automobiles, even in locations, which have average pollution levels well below the current EPA standards, can have significant positive effects on children's respiratory health.*

Emilia Simeonova & Janet Currie & Peter Nilsson & Reed Walker, 2018. "Congestion Pricing, Air Pollution and Children's Health," NBER Working Papers 24410, National Bureau of Economic Research, Inc.

Parking Fees an Economic Perspective – A further paper on the impact of parking charges and behaviour

<http://www.sciedu.ca/journal/index.php/ijba/article/viewFile/6626/3948> talks about the complementary relationship between vehicle parking, increases in parking fees and their proportionality in controlling vehicle growth rates and demand.

Key points include:

Increased parking fees will lead to the desire to reduce private car travel, prompting people to choose alternative forms of travel

If travellers expect higher parking fees they will change their route, or use other means of transport to reach their destinations.

'Benefits of Parking Management in London August 2018'.

<https://www.londoncouncils.gov.uk/node/34485>

A comprehensive 2018 policy report by London Councils '**Benefits of Parking Management** in London August 2018' addressed many of these key principles. <https://www.londoncouncils.gov.uk/node/34485> The report stated that:

Parking management is the only mechanism through which local authorities can ensure stationary vehicles are parked in an amenable and equitable manner, thus solidifying its importance and the benefit it delivers.

There are many parking management benefits, which include reducing congestion, improving air quality, providing funding for parking and wider transport scheme improvements and ensuring good access and accessibility.

Of particular significance is the fact that these benefits deliver benefit to everybody, from motorists themselves to the person sat at home, and all road users and non-road users in between.

As part of the information provided during the consultation period, residents, business associations, visitors, resident associations and organisations were directed to a proposed list of measures of success that the council could consider using for the future.

Ultimately, the outcome the council is aiming for, is improved health and wellbeing of our residents, visitors and those who work in the borough. We know this will take time and effort from many other organisations. Merton are however committed to do what we can. There are some things we can measure to make sure we focus on developing a more sustainable transport strategy over the coming years, which include:

- Reduction in congested areas of our high streets
- Reduction in CPZs / permits issued, including visitor permits, including:
- Reduction in multiple permits sold to the same house
- Reduction in the number of season tickets sold
- Investment in infrastructure and sustainable transport solutions:
- Number of additional electric charging bays
- Number of additional cycle routes
- Number of additional cycle parking facilities
- Greater use of public transport journeys within the borough
- Increase in the number of 'active transport' activity in the borough:
- Number of walking journeys in the borough
- Number of cycling journeys in the borough

It is anticipated that these measures will be used over the coming years to determine the success and levels of the councils parking charging policy and how this contributes to less air pollution.

Public health:

Along with air quality a key objective is to contribute towards improved public health of Merton and London's residents. There are many factors beyond our control but we are committed to working with colleagues in Public Health and shall monitor progress.

Alternative options have been reviewed and the Council has committed reviewing the impact of its existing diesel levy and for future emissions based charging within Merton. The report will be presented to Cabinet later this year.

With regards to para 2(c):

As noted at the Sustainable Communities Scrutiny Panel on 27 June:

- *No equality groups have been directly consulted with, with regards to the proposals or the mitigation measures set out in the 3 Equality Assessments. This seems contrary to the Equality Assessment Flowchart, which requires officers to "Consult appropriate stakeholders as part of the review" when they are carrying out the review under qu 8 "Draw up a list of areas of concern. Review ways to remove or minimise the negative impact/discrimination".*

Officer response

On the matter of directly consulting with equality groups, the list below shows the organisations that were directly contacted at the start of the consultation in March 2019 seeking their views.

- Wimbledon Guild - info@wimbledonguild.co.uk
- Age UK Merton.- info@ageukmerton.org.uk
- Polish Family Organisation - slawek.szczepanski@polishfamily.co.uk
- BAME voice - info@bamevoice.org
- Carers Support Merton info@csmerton.org
- Ethnic Minority Centre ethnicminority@btconnect.com
- Mitcham and Morden Guild mandmguild@aol.com
- Merton CIL info@mertoncil.org.uk
- Merton Seniors Forum mertonseniorsforum@hotmail.co.uk

In addition, a copy of the consultation documentation was also sent to Merton Voluntary Sector Compact (MVSC) who in themselves have direct links to over 800 voluntary groups and organisations in Merton.

A copy of the consultation documentation sent out to the above equality groups is attached as Appendix C5

The councils consultation website and the links sent to the relevant equality groups all included hyperlinks to the Cabinet – Public health, air quality and sustainable transport strategic approach to parking charges report in December 2108.

As well as the Sustainable Communities Overview and Scrutiny in January 2019, all of which have the link to the relevant EIA's to allow individuals and groups to comment on the proposed mitigations and action plans as drafted at that point in time. <https://democracy.merton.gov.uk/documents/s26073/Appendix%208%20-%20Equality%20Analysis%20for%20public%20health%20and%20air%20quality.pdf>

Following an analysis of all the responses received the EIA for the Public health, air quality and sustainable transport-a strategic approach to parking charges report, was updated to reflect the feedback from the consultation in advance of the June Scrutiny meeting and Cabinet on the 15th July 2019.

<https://democracy.merton.gov.uk/documents/s28668/Revised%20Equalities%20Impact%20Assessment%20v%20june%202019%20v3.pdf>

A copy of the “public health, air quality and sustainable transport – a strategic approach to parking charges” equalities impact assessment is attached as Appendix A2 to this report. The EIA sets out the overarching aims objectives and desired outcome of the proposal and their contribution to the council's corporate priorities. It also includes a detailed background on who will be effected by this proposal and the evidence the council has considered as part of its assessment.

The Council received no responses to its consultation from any of the above organisations representing equality groups.

The council also believes that in accordance with the equality assessment flow chart, the above referenced/linked documentation, and the references contained in the minutes of the Cabinet meeting 15th July 2019, (as set out below) that the council has met its requirement to “draw up a list of areas of concern. Review ways to remove or minimise negative impact/discrimination.”

Extract from the minutes of the Cabinet meeting 15th July 2019.

<https://democracy.merton.gov.uk/mgAi.aspx?ID=12748>

The Cabinet Member went on to address the points made in the Scrutiny reference report. In relation to transport accessibility, officers were currently talking to TfL on improving step free access across the borough, which the Cabinet Member for Equalities had raised as one of her priorities at the Council meeting on 10 July. The most recent Residents' Survey had showed that residents do rate the current public transport provision in the Borough.

In respect of the impact on the elderly, the Cabinet Member drew the Cabinet's attention to the comprehensive Equality Impact Assessment which had been undertaken. He and the Cabinet Member for Regeneration, Housing and Transport had asked officers to look at work being done by other boroughs on this issue. There were currently a range of measures to address and this would continue to be kept under review should the proposals be agreed.

At the invitation of the Chair, the Director of Environment and Regeneration reminded Members of their Public Sector Equality Duty, that all public bodies must prevent discrimination and have due regard to the need to consider and apply fairness and equality in carrying out their functions, particularly when making decisions or formulating policy. He drew Members attention to the updated Equality Impact Assessment (EIA), which had been circulated in advance of the meeting, which contained an analysis of the impact of the proposals on those with protected characteristics under the Equalities Act following a comprehensive consultation process.

The EIA demonstrated both positive, in terms of improved air quality and public health, and negative impacts to some groups in particular those with a disability, socio-economic and pregnancy and maternity. However in light of the mitigation measures set out in the EIA, the impact was assessed to be low and proportionate to the legitimate aim of the policy. Although the EIA had not identified a potential negative impact on the elderly, it was acknowledged that elderly people were more likely to have mobility issues and the EIA referred to mitigation measures already in place or planned.

The Director drew the Cabinet's attention to the Improvement Plan at section 5 of the EIA which set out actions and timescales proposed to be undertaken, including arrangements for free parking for Blue Badge holders in certain bays, dedicated disabled bays and free carer permits. Although residents over 60 qualified for free public transport, it was acknowledged that some of the stations in the Borough were not step free and this was also identified as an issue in the pregnancy and maternity category. Therefore, the Council would continue to lobby both Network Rail and TfL for improvements (1).

It should be noted that the proposals were complimentary to a number of measures already either underway or planned and if approved, the policy would be kept under review and representatives of the affected groups would be consulted with to assess ongoing impact and consider further mitigation. Adjustments would be brought forward for Members' consideration as appropriate.

(1) The extract below has been taken from a recent letter sent by the Leader of the Council to the Mayor of London attached as Appendix C4.

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

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

The Council acknowledges that, where possible, convenient parking should be provided for residents to enable them to park near their homes, where practicable, and parking provision is also necessary to meet the needs of people who have no other alternative other than to use their vehicle e.g. individuals with disabilities.

A number of key factors were considered in the review of on and off-street parking and permits, which included:

- (i) Ease of access to public transport (PTAL)
- (ii) Air Quality hotspots
- (iii) Areas of high congestion
- (iv) Enforcement requirements

This evidence was considered in light of the Merton profile detailed in section 3 of the EIA attached as Appendix A.

In order to fully understand how the proposals would affect users and residents, the Council undertook a comprehensive consultation exercise to gain the views of residents and stakeholders. This enabled the Council to make informed decisions and to develop the proposed policies.

Merton is committed to undertaking comprehensive consultation to gain the views of residents and stakeholders. This enables the Council to make informed decisions and to develop our policies.

The Parking Charges consultation commenced on Friday 29th March and ended Sunday 5th May 2019. As this consultation formed part of a statutory consultation process, there were a number of legal obligations, as well as a commitment to bringing the proposals to as wide an audience as possible.

To ensure the council could generate as much feedback as possible, representations were invited in writing via the web page, or by email to a dedicated email box. In addition, an online survey was available which asked prescribed questions and tick box responses, which were recorded. Circa 3,000 representations were received. Due to the number of responses received, the council extended its review period to the 18th June 2019. This ensured that full consideration was given

to all representations, and to allow any further comments from the resident and business associations to be included.

The Council published a 2-page feature article in My Merton, which was delivered to every household within the borough in March/April 2019 to align with the consultation period. As well as the online consultation and the My Merton article the council also attended Community Forum meetings during the period of the consultation; followed the statutory Traffic Management Order process of displaying notices in roads within all of the CPZ areas, on pay, display machines, and in all council owned car parks, in addition a statutory notice was placed in the newspaper.

Copies of all proposals and background papers were made available on deposit at all libraries and at the Civic Centre for public inspection/reference. We consulted with statutory and non-statutory consultees. On the council's home page, we displayed a link to the consultation web pages. The web pages gave full details of the proposal along with background papers and reports. The pages also included a section, which aimed to address frequently asked questions.

A number of statutory bodies were consulted as part of the Traffic Management Order making process. The only response received was from the Metropolitan Police who raised no objections.

The Council believes that it has consulted with appropriate stakeholders as part of the review. Details of the consultation process used was set out in section 10 of the Sustainable Communities Overview and Scrutiny report 27 June 2019.

In addition, an online survey was available which asked prescribed questions and tick box responses, which were recorded.

Circa 3,000 representations were received. To put this in context the council currently issues circa 20,000 Permits per year and over 150,000 visitor permits per year.

Information and instructions on how to access the consultation was also sent to 600 plus residents and organisations who have previously declared they wish to be informed of consultations and matters which may be of interest.

A number of statutory bodies were consulted as part of the Traffic Management Order making process. The only response received was from the Metropolitan Police who raised no objections.

- *From conversations with officers concerning the equality assessments, there is an indication that part of Equality Assessment 2 (presented to the Scrutiny Panel) has been changed to better reflect officers' views on the areas of concern, but this may have changed the emphasis of the risks as far as councillors are concerned.*

Officer response

The emerging EIA documentation has been to a number of committees.

Cabinet December 2019, Sustainable Communities Overview and Scrutiny Panel 9th January 2019, Sustainable Communities Overview and Scrutiny Panel 27th June, Cabinet 15th July 2019

We acknowledge that the call in response recognises that the EIA has evolved and been updated, to include the feedback from the consultation responses, over the development of the proposals as set out below.

The councils consultation website and the links sent to the relevant equality groups all included hyperlinks to the Cabinet - Public health, air quality and sustainable transport strategic approach to parking charges report in December 2108.

As well as the Sustainable Communities Overview and Scrutiny in January 2019, all of which have the link to the relevant EIA's to allow individuals and groups to comment on the proposed mitigations and action plans as drafted at that point in time. <https://democracy.merton.gov.uk/documents/s26073/Appendix%208%20-%20Equality%20Analysis%20for%20public%20health%20and%20air%20quality.pdf>

Following an analysis of all the responses received the EIA for the Public health, air quality and sustainable transport-a strategic approach to parking charges report, was updated to reflect the feedback from the consultation in advance of the June Scrutiny meeting and Cabinet on the 15th July 2019.

<https://democracy.merton.gov.uk/documents/s28668/Revised%20Equalities%20Impact%20Assessment%20v%20june%202019%20v3.pdf>

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

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

Officer response

The Council is pleased that the signatories are in favour of supporting measures to tackle air quality in the borough. Air quality is a priority for Merton as with many other council's in London, therefore we must be taking all of the actions we have within our powers to tackle this problem, something that is not only a legal duty, but a moral duty to protect the health of our citizens.

In 2018 the Council produced a new Air Quality Action Plan for the next 5 years, this outlined the steps we will take to contribute to tackling this public health crisis. This is attached as Appendix C2

This Action Plan has been warmly welcomed and considered one of the most progressive in London, it also leads the way on many initiatives. There are 70 actions in the Plan these cover all of the areas within our control to deal with this serious problem.

It is important to note that the statutory responsibility allied to this agenda is something we can be challenged on, and judged by our actions. In the same way Central Government has been challenged by Client Earth in recent years.

The consideration and use of parking charges was one of the many measures proposed in the Action Plan..

In 2018 The GLA (London governing body for Air Quality) produced a list of measures that Local Authorities should take to tackle poor air quality. This list of 25 measures were all covered and supported in Merton's Air Quality Action Plan.

One measure considered as a 'High Priority' and 'High Benefit' is the use of parking policy to reduce pollution emissions.

Merton is one the increasing number of Councils that are prepared to be bold and use all of the controls open to use to tackle air pollution and as such we cannot dismiss a measure that is considered as High Priority and High Benefit.

Merton is not prepared to ignore its responsibilities to deliver cleaner local air at a time when the current situation has been described as a public health emergency.

The Council recognises the part that it has to play in developing and delivering a framework to tackle air quality, demand for parking, and congestion in the borough. It does not stand alone on these issues. All of the other London boroughs are seeking to implement new parking policies to tackle similar problems.

There are very few direct levers available to stimulate a change in driver behaviour, and the council believes that the rationale for setting the new

parking charges is about giving people the right nudge and opportunity to make different choices.

From November 2018 through to July 2019, Cabinet considered and agreed a series of reports setting out its approach to Public Health, air quality and sustainable transport – a strategic approach to parking charges. These reports set out the key strategic drivers that will affect parking policy for the future.

Then, and now, Members are requested to exercise their statutory duty to secure the expeditious, convenient and safe movement of traffic, and the provision of suitable and adequate parking facilities in the context of the public health agenda. This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.

This report supports the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.

The report explains the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by 'making the healthy choice the easy choice'.

In setting out its measures of success, the new charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets - to benefit residents and businesses alike.

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

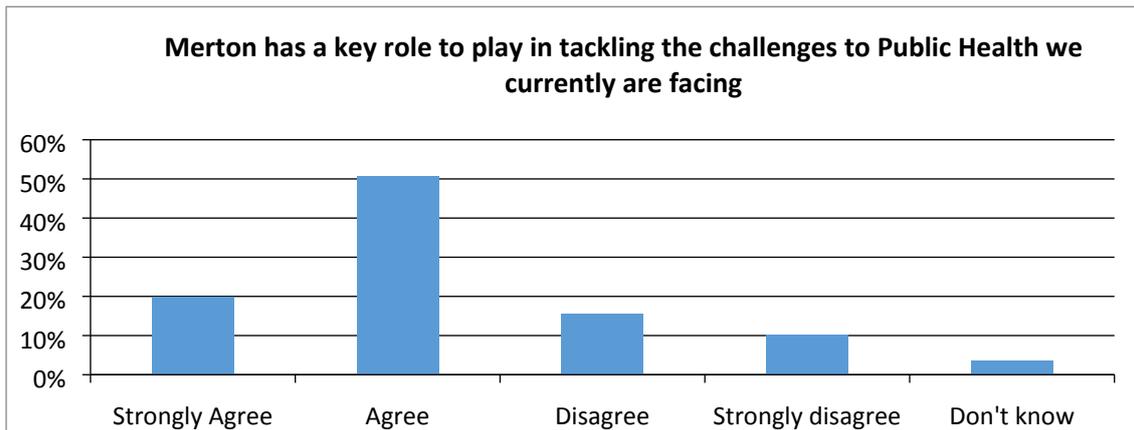
The benefits to health of these reductions in health risks were detailed in the last report to Cabinet. In summary these are:

- Less air pollution. Poor air quality causes respiratory and cardiovascular disease, and the latest evidence shows effects on the brain hastening dementia and cognitive impairment in children.
- Less sedentary behaviour. From a public health point of view, there is a strong argument for urgent and substantial action. Diabetes in Merton is increasing by about 2% per year, and it is estimated that 90% of new cases are potentially preventable. One in five children entering reception are currently overweight or obese, a figure which increases to one in three

leaving primary school in Year 6. Almost 60% of Merton adults are overweight.

- **Healthy places:** The 'healthy streets' approach defines a healthy street as one with things to see and do; places to stop and rest; shade and shelter; clean air; and pedestrians from all walks of life. Parking policy has its part to play alongside changes to the built environment to create healthy streets

The graph below is the response from the recent consultation specifically asking if Merton has a key role to play in tackling the challenges to public health we are currently facing. (Merton has a key role to play in tackling the challenges to Public Health we currently are facing).



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

Parking policy has the potential to shape and define public health benefits. Improving air quality is important because 6.5% of mortality in Merton is attributable to poor air quality.

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

We know that over 9,000 Londoners die a premature death through poor air quality. This issue has risen significantly in prominence and importance where hardly a day goes by without a new article or scheme being proposed. Councils up and down the land are seeking new and bold solutions to what is a huge challenge.

The Mayor for London Sadiq Khan has rightfully placed growth, healthy people and places as the central theme of his adopted Transport Strategy. Merton Council is supportive of the strategy and in particular the adoption of healthy streets indicators when designing public realm improvements to make London's streets healthier places where people can be encouraged to choose walking and cycling as their choice of travel.

The Merton parking service already actively contributes to; and helps deliver the key policies set out in: Merton's Health and Wellbeing Strategy; Merton's Air

Quality Action Plan; the Council's Local Implementation Plan; delivering the Governments' carbon reduction targets and the Mayor of London's Transport Strategy.

The London Borough of Merton historically and presently, continues to exceed targets and its legal objectives for local air pollution, including Nitrogen Dioxide (NO₂). The Government, local authorities and policy makers are being continuously challenged around delivering their responsibilities to reduce pollution, and are often criticised for lack of action or being slow to respond.

Air quality has been identified as a priority both nationally and within London, where pollution levels continue to exceed both EU limit values and UK air quality standards. Pollution concentrations in Merton continue to breach the legally binding air quality limits for both Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀). The air quality-monitoring network, run by Merton, has shown that the UK annual mean NO₂ objective (40µg/m³) continues to be breached at a number of locations across the borough including Colliers Wood, Morden, Tooting and South Wimbledon. In some locations, the NO₂ concentration is also in excess of the UK 1-hour air quality objective, which indicates a risk not only to people living in that area but also for those working or visiting the area. Reducing vehicle numbers (car usage) and different types of vehicle has a direct and tangible benefit on air quality.

In Merton, an Air Quality Management Area (AQMA) has been declared for the whole borough with four locations identified as having high levels of pollution and human exposure. These are in the main centres of Mitcham, Morden, Raynes Park and Wimbledon.

Poor air quality in Merton comes from a number of sources, but our legal exceedances are almost entirely due to road transport. Road transport accounts for approximately 60% of emissions of NO₂ in our borough. Simply put, this is due to traffic including the nature of vehicles on our roads, the volume of vehicles and the number of trips that they take.

- *This decision to increase the cost of CPZ permits has not been an open decision informed by evidence, but one taken behind closed doors, without proper scrutiny, and without any consideration of the alternatives.*

Officer response

The table below sets out a comprehensive timetable of open meetings where appropriate scrutiny of the public health, air quality and sustainable transport a strategic approach to parking charges, has been carried out.

A section entitled alternatives and options was included in every report.

Notwithstanding the above, a full public consultation was carried out through March to June 2019. A copy of the consultation and proposals was sent to every resident in Merton via *My Merton*. Residents, businesses, residents associations and organisations were encouraged to submit their ideas and views to inform the decision making process.

Meeting & Date	Link
Cabinet 12th November 2018	https://democracy.merton.gov.uk/ieListDocuments.aspx?CId=146&MId=3085&Ver=4
Cabinet. 19 th December 18	https://democracy.merton.gov.uk/ieListDocuments.aspx?CId=146&MId=3086&Ver=4
Sustainable Communities Overview and Scrutiny Panel 9 th January 2019	https://democracy.merton.gov.uk/ieListDocuments.aspx?CId=157&MId=3155&Ver=4
Cabinet 14 th January 2019	https://democracy.merton.gov.uk/ieListDocuments.aspx?CId=146&MId=3087&Ver=4
Public consultation period	March to June 2019
Sustainable Communities Overview and Scrutiny Panel 27th June 2019	https://democracy.merton.gov.uk/ieListDocuments.aspx?CId=157&MId=3437&Ver=4
Cabinet 15th July 2019	https://democracy.merton.gov.uk/ieListDocuments.aspx?CId=146&MId=3396&Ver=4
Overview and Scrutiny Commission 14 th August 2019	Special meeting scheduled https://democracy.merton.gov.uk/ieListDocuments.aspx?CId=148&MId=3592&Ver=4

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

Officer response

We believe the seriousness of the air pollution problem in Merton has been well set out in the committee reports listed above. Notwithstanding this it is important to note parking charges are part of the solution, alongside a number of other activities that the council is undertaking to address this problem.

A number of parking charges have evolved over the years and have met the

needs for specific areas and schemes at a particular point in time. There were minor adjustments in 2015, but no significant review has been undertaken

since before 2010. However, in this review the opportunity to further simplify the charges has been taken. Likewise, the proposals seek to further strengthen and develop the links between Public Health, air quality and how future charges can moderate parking behaviour.

Over the last 10 years where car parking and permit prices have been frozen the number of cars registered in Merton rose from 69,500 to 71,900. Whilst car ownership in the borough has started to decline over the last 12 months' overall car ownership has risen by approximately 3.3% over the last 10 years.

Future charging levels, that are too low, will not meet our future strategic objectives to improve public health and air quality, increase active travel and see the level of car ownership decrease.

The previous committee reports set out four basic principles, which set out the rationale that underpin the proposed charging structure:-

- (i). Ease of access to public transport
- (ii). Air Quality indicators
- (iii). Parking demand and space availability
- (iv). Enforcement requirements

(i) Ease of access to public transport:

In proposing the grouping and charge levels of each CPZ. Each CPZ was assessed against PTAL levels and as a guide, the criteria set out below:

- CPZs within 20 minutes' walk of an (1) underground and (2) mainline station and tram stop are in Tier 1.
- CPZs within 20-minute walk of (1) an underground or (2) mainline station are Tier 2.
- CPZs with no access to a mainline or an underground station within an approx. 20-minute walk are Tier 3.
- There are buses in many cases which complement access to train and tram provision within the borough.

(ii) Air Quality:

Merton's air quality levels are poor. A charging structure, that helps to change habits and car ownership throughout the borough, will have a beneficial medium to long-term effect. A number of hotspots coincide with areas of high parking demand and traffic movement. e.g. Wimbledon Town Centre. These focus areas align themselves with some of the more congested areas of the borough, and support the recommendations, which aim to address air quality issues.

(iii) Areas of high parking demand

Parking demand varies within the borough. Higher Charges are being proposed in areas of high demand to encourage the journey to be made either by walking, cycling or public transport, rather than by the use of a car.

(iv) Enforcement requirements

It is recommended to align charges with the hours of operation of the permit bays. For example, permits for a CPZ that are controlled for a shorter period, should cost less than permits for zones that are controlled for a longer period. There is a direct cost of enforcement, dependant on the length of time a scheme is operational. This is reflected in the proposed cost of a permit.

The proposals are not based on air quality or pollution in isolation. The annual Mean NO2 data for 2018 in Appendix C3 clearly shows that the air quality exceedances are dispersed across the borough including Wimbledon.

A copy of the councils Air Quality Action plan is attached at Appendix C2 which shows the full extent of the Councils policy choices and projects which the parking charges review will compliment.

The Council believes that the evidence it has provided to members sets out the rationale why Merton needs to use all of the powers available, to tackle and challenge this problem, and also to work towards delivering our legal responsibilities to protect the public.

There are very few direct levers available to stimulate a change in driver behaviour, and the council believes that the rationale for setting the new parking charges is about giving people the right nudge and opportunity to make different choices.

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

- *The decision to proceed with the CPZ and parking bay increase is disproportionate to the desired outcome. The claimed outcome that a reduction in emissions will occur as residents will switch away from private vehicles is not supported by credible evidence. The only credible assertion in the **Public health, air quality and sustainable transport - a strategic approach to parking charges** is that the revenue received by the council will rise by almost £2,000,000 across the borough.*
- *The decision does not offer any practical solutions to deal with the pollution hot spots in Mitcham and Morden and nor does it offer support for low emission bus zones or other air quality mitigation measures that have been shown to work.*
- *This policy as proposed is a blunt instrument which doesn't appear necessarily to target the behaviour which is causing the borough's air pollution problems. The levy simply penalises residents who live in a CPZ regardless of how much they actually drive their vehicle.*

Officer response

A copy of the councils Air Quality Action plan is attached at Appendix C2 which

shows the full extent of the councils actions to deal with the pollution hot spots across the borough including Mitcham and Morden.

This measure is considered to be 'High Priority' and 'High Benefit' by the GLA (our Governing Body). It is difficult at the onset of such a policy to predict the outcome and direct benefit on ambient air quality; this can only be established as the impact of change becomes apparent and assessment of monitored air quality trends over a period of time. As data becomes available, this change can be reviewed and assessed against tail pipe reductions as the policy develops.

This policy supports a multi-faceted approach to tackling air quality in the borough. It is not the only measure the Council is taking and needs to be considered in the context of a comprehensive plan to tackle air quality in the borough.

(Refer to Appendix C2)

Please refer to a recent letter sent by the Leader of the Council to the Mayor of London seeking their support for the further introduction of low emission buses within the borough as soon as possible. Appendix C4.

A reduction in car ownership, more use of public transport and a shift to more sustainable active modes of transport, will inevitably help to reduce the levels of car based emissions throughout the borough.

A number of respondents stated that parked cars do not pollute. No car is bought just to be parked; it is bought to be driven. How often and how far does vary, but it will be driven. The principle of charging based on location to public transport and local amenities is that it is easier to travel without the car on a day-to-day basis, than from locations with poorer access to amenities and public transport.

(c) respect for human rights and equalities;

- *No due regard has been given as to the impact this would have on the elderly, it was acknowledged by the cabinet member and the director that specific elderly welfare groups such as AgeUK Merton, the Wimbledon Guild etc. have not been contacted or made duly aware of these proposals. Unlike the direct contact made by the Council to the business community and some residents associations.*
- *Page 13 of the revised and altered EIA document shows that 50% of over 65s have some form of limitation to do daily activities. However this assessment then goes on to claim there is no negative impact on the elderly, and casually asserts that the proposed parking fees will be positive. We are not sure what evidence they have to back this up.*

Officer Response

On the matter of directly consulting with equality groups, the list below shows the organisations that were directly contacted at the start of the consultation March 2019 seeking their views.

- Wimbledon Guild - info@wimbledonguild.co.uk
- Age UK Merton.- info@ageukmerton.org.uk
- Polish Family Organisation - slawek.szczepanski@polishfamily.co.uk
- BAME voice - info@bamevoice.org
- Carers Support Merton info@csmerton.org
- Ethnic Minority Centre ethnicminority@btconnect.com
- Mitcham and Morden Guild mandmguild@aol.com
- Merton CIL info@mertoncil.org.uk
- Merton Seniors Forum mertonseniorsforum@hotmail.co.uk

In addition, a copy of the consultation documentation was also sent to Merton Voluntary Sector Compact (MVSC) who in themselves have direct links to over 800 voluntary groups and organisations in Merton.

A copy of the consultation documentation sent out to the above equality groups is attached as Appendix C5.

The councils consultation website and the links sent to the relevant equality groups all included hyperlinks to the Cabinet - Public health, air quality and sustainable transport strategic approach to parking charges report in December 2108.

As well as the Sustainable Communities Overview and Scrutiny in January 2019, all of which have the link to the reinvent EIA's to allow individuals and groups to comment on the proposed mitigations and action plans as drafted at that point in time. <https://democracy.merton.gov.uk/documents/s26073/Appendix%208%20-%20Equality%20Analysis%20for%20public%20health%20and%20air%20quality.pdf>

Following an analysis of all the responses received the EIA for the Public health, air quality and sustainable transport-a strategic approach to parking charges report, was updated to reflect the feedback from the consultation in advance of the June Scrutiny meeting and Cabinet on the 15th July 2019.

<https://democracy.merton.gov.uk/documents/s28668/Revised%20Equalities%20mpact%20Assessment%20v%20june%202019%20v3.pdf>

We received no responses relating to the consultation from any of the above organisations representing equality groups.

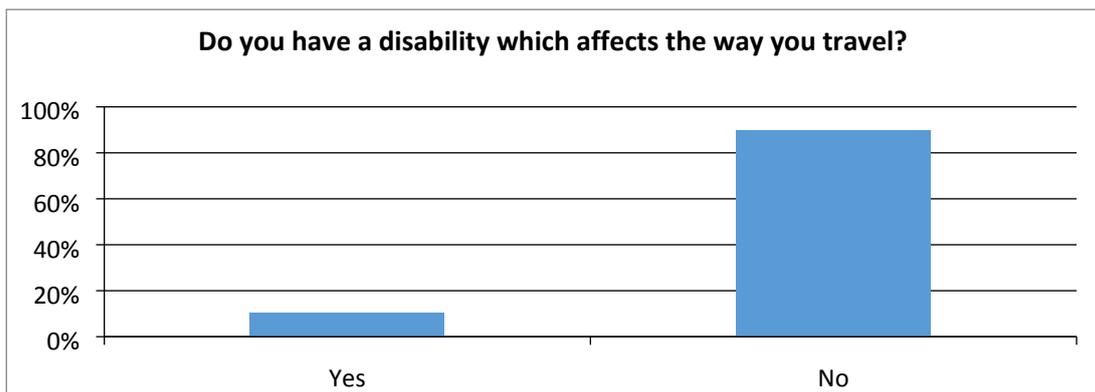
A more detailed analysis of the consultation responses shows that there were 210 people (6.6%) out of the circa 3,000 who replied said they needed a car for the following reasons:

Disabled /elderly plus social isolation / carers	210	6.6%
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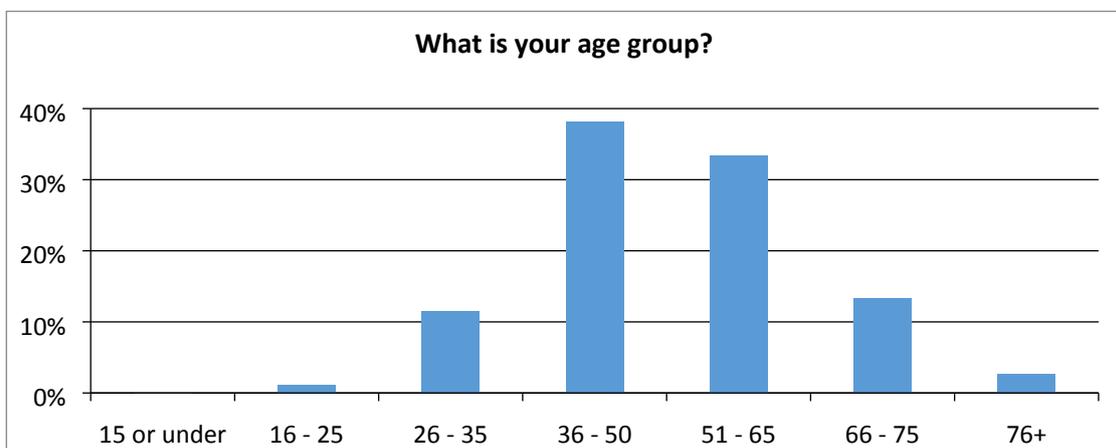
These figures needs to be considered against the 209,400 residents, which is projected to increase by around 3.9% to 217,500 by 2025.

The total number of responses received from residents within the borough equates you 1.43% of population within Merton.

The responses from the consultation also showed that 10% of the respondents have a disability, which affects the way they travel. This equates to 0.14% of residents within the borough.



The responses from the consultation also showed that 16% of the respondents were over the age of 65. This equates to 0.23% of residents within the borough.



Section 3 of the EIA assessment attached to the Cabinet report on the 15th July 2019, set out a detailed profile that included all residents, businesses, workers and visitors to the borough including the elderly. Section 6 of the report states that under potential negative impact for age that “as there is an acceptance that

elderly people are more likely to be infirm, have mobility problems or have a disability than younger people.”

Age

Positive Impact

The proposals support the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.

The proposals support the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by ‘making the healthy choice the easy choice’.

In setting out its measures of success, the new charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets - to benefit residents and businesses alike. This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.

Potential Negative Impact

None identified. However please refer to ‘Disability’ below, as there is an acceptance that elderly people are more likely to be infirm, have mobility problems or have a disability than younger people.

Disability

Positive Impact

The proposals support the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.

The proposals support the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by ‘making the healthy choice the easy choice’.

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Potential Negative Impact

Negative Impact: Any increase in parking charges has the potential to negatively impact on those with a disability.

Note. There is an acceptance that elderly people are more likely to be infirm, have mobility problems, but may not be considered disabled. For the purpose of this EIA the mitigation for problems commonly caused by age such as being infirm or mobility problems have been addressed under disability.

Improvement Action Plan

Please refer to Appendix A2 section 8

There are also 3 Freedom Passes;

- For people aged 66 or above
- For 60 plus years with a Oyster Photo Car off peak travel only from 09:30 on weekdays and anytime on weekends and public holidays.
- For disabled people if you have an eligible disability and live in London.. The Freedom Pass allows people free travel across London and free local bus journeys nationally.

Dial a Ride

TfL also offers a service for the following customers who can make use of a mini bus or adapted vehicle service for a door-to-door service.

<https://tfl.gov.uk/modes/dial-a-ride/making-the-most-of-dial-a-ride?intcmp=59082>

You must have a permanent or long-term disability, which means you are unable to use public transport. You are automatically eligible for membership if you are:

- A Taxicard member
- Getting the Higher Rate Mobility Component of Disability Living Allowance
- Getting the Standard or Enhanced Mobility Rate of the Personal Independence Payment (PIP)
- Registered blind or partially sighted
- Aged 85 or over
- Getting a Higher Rate Attendance Allowance
- Getting a War Pension Mobility Supplement

If none of the above apply to you, you may still be able to join Dial-a-Ride but you will have to undergo a paper-based mobility assessment to establish your eligibility for the service.

Taxi card

There is the London Taxicard scheme which provides subsidised taxi transport for people who have serious mobility or visual impairment and who have difficulty using public transport.

https://www.bromley.gov.uk/info/200022/help_with_transport/149/london_taxicard_scheme

Merton is committed to supporting its residents that have mobility issues, and there are a number of ways we currently support this objective.

Merton is a member of the national Blue Badge scheme. The Blue Badge provides a range of parking and other motoring concessions for people who are registered blind or have severe mobility problems. Blue Badge holders can park free of charge in any Merton disabled parking bay, pay & display and shared use bay or permit holder bay.

Later this year the Blue Badge eligibility scheme will be extended to those with a wide range of mental health issues that affect their mobility. This will extend our current provision to support additional residents within the Borough.

A Blue Badge holder in Merton is entitled to apply for a free carer permit under certain conditions. This is to further support those residents with mobility issues and in need of regular support and care. The carer permit eligibility is based on being a Blue Badge holder.

Any increase in charges is offset by eligibility for a Blue Badge, which provides free on street parking at many locations, including on single and double yellow lines.

Blue badge holders in Merton can park in their CPZs at no cost by displaying their blue badges.

Those with disabilities are also able to apply for the creation of a disabled bay.

- *Many require carers who will not be able to afford to pay large fees in every CPZ they visit. The director made an off the cuff remark at cabinet about carers being able to get a special permit but there is little to no detail on the website to advise on this or information that could be given to the elderly requiring carers.*

Officer Response

Carer's Resident Address Permit entitlement

Any person who is a resident of Merton and a Blue Badge Holder is entitled to a free Residents Address Permit. This is a paper permit which can be transferred between vehicles for display in the vehicle which is being used to visit the Blue Badge holder. It is only valid in the CPZ where the Blue Badge holder lives. It is valid for 12 months. This concession is advertised on our web pages and is a policy which has been in place for a number of years.

This provision is also extended on application to residents who have provided medical evidence from a GP or medical professional, demonstrating the need regular visits. Merton issued approximately 1,100 of these permits between April 2018 and May 2019.

There are other ways we can assist those who need short term additional visits, either through the sale of visitor vouchers, including increasing the limit in exceptional circumstances, or by providing a number free of charge, at our discretion.

Further if it is the same family member(s) who use the same car to visit and assist those needing care for a short period, we can add that vehicle to our database to prevent a PCN from being issued.



[Home](#) < [Streets, parking and transport](#) < [Parking](#)

Blue Badge parking permits for disabled people

The national Blue Badge Scheme provides a range of parking and other motoring concessions for people who are registered blind or have severe mobility problems.

Blue Badge holders can park free of charge in any Merton [disabled parking bay](#), pay and display, shared use bay or permit holder bay for an unlimited period.

Residents with a Blue Badge may also apply for a [resident permit](#) free of charge.

- *The same impact assessment on page 16 claims the disability groups would receive a positive impact because of this proposal. But simultaneously states there could be a negative impact on the disabled. It refers back to 'Age' and in that section it refers to 'Disability' in a circular loop without once outlining or acknowledging what the impact on these groups would be.*
- *Section 3 of the EIA assessment attached to the Cabinet report on the 15th July 2019, set out a detailed profile that included all residents, businesses, workers and visitors to the borough including the elderly. Section 6 of the report states that under potential negative impact for age that "as there is*

an acceptance that elderly people are more likely to be infirm, have mobility problems or have a disability than younger people.”

Age

Positive Impact

The proposals support the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.

The proposals support the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by ‘making the healthy choice the easy choice’.

In setting out its measures of success, the new charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets - to benefit residents and businesses alike. This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.

Potential Negative Impact

None identified. However please refer to ‘Disability’ below, as there is an acceptance that elderly people are more likely to be infirm, have mobility problems or have a disability than younger people.

Disability

Positive Impact

The proposals support the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.

The proposals support the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by ‘making the healthy choice the easy choice’.

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Potential Negative Impact

Negative Impact: Any increase in parking charges has the potential to negatively impact on those with a disability.

Note. There is an acceptance that elderly people are more likely to be infirm, have mobility problems, but may not be considered disabled. For the purpose of this EIA the mitigation for problems commonly caused by age such as being infirm or mobility problems have been addressed under disability.

Improvement Action Plan

Please refer to Appendix A2 EIA section 8.

We would expect the council to contact and liaise with such groups as Merton CIL, Merton Vision etc. to assess the true impacts on these communities before making assertions of fact.

Council Response

On the matter of directly consulting with equality groups, the list below shows the organisations that were directly contacted at the start of the consultation March 2019 seeking their views.

- **Merton CIL** info@mertoncil.org.uk
 - Wimbledon Guild - info@wimbledonguild.co.uk
 - Age UK Merton.- info@ageukmerton.org.uk
 - Polish Family Organisation - slawek.szczepanski@polishfamily.co.uk
 - BAME voice - info@bamevoice.org
 - Carers Support Merton info@csmerton.org
 - Ethnic Minority Centre ethnicminority@btconnect.com
 - Mitcham and Morden Guild mandmguild@aol.com
 - Merton Seniors Forum mertonseniorsforum@hotmail.co.uk
-
- *A further group, pregnancy and maternity, has not been factored in as to why residents at this stage of life wish to have a car. Use of a car is often the only way to get to the hospital as public transport could be difficult to access when heavily pregnant or with young child.*
 - *The lack of step free access to railways and even buses does not help. The fact that it is difficult to reach the hospitals. The council needs to recognise that this group would be penalised by their need for a car. Also they are less likely to be able to hire vehicles whilst at this phase. Car*

Clubs are not the right solution for this group.

Officer Response

Hospitals are actually very well served by public transport, with bus and underground options to the 2 major hospitals of St Georges, Tooting and St Helier, Sutton.

Car Clubs

Car Clubs are in many cases a genuine alternative to owning a car and continue to grow in popularity and membership throughout Merton and London. They are quick easy and convenient to use for short local trips as well as longer visits or period.

Taxis

Taxi's are also a practical solution to attend appointments and undertake visits. This links shows the benefits and convenience of using a taxi for visits to hospitals for example. <https://www.gov.uk/transport-disabled/taxis-and-minicabs>

Taxi card

There is the London Taxicard scheme which provides subsidised taxi transport for people who have serious mobility or visual impairment and who have difficulty using public transport. <https://tfl.gov.uk/modes/taxis-and-minicabs/taxicard-and-capital-call>

M- Card

Children and young people on Merton's Disability Database for Children and Young People may be eligible for an M-Card. This card will identify that your child has a disability or special need and can be used to obtain discounts or get help such as 'fast tracking' when there are long queues.

<https://www.merton.gov.uk/social-care/children-young-people-and-families/m-card>

1. M-Card allows at school dropping off and picking up time, 30 minutes at the schools listed.
2. M-Card allows 2 hours free parking at children centres.
3. M-Card at Peel House, allows a second hours parking free.

The Council works closely with TfL and Network Rail to ensure that the Highway infrastructure accommodates the efficiency of public transport services. This includes accessibility.

- (1) The extract below has been taken from a recent letter sent by the Leader of the council Mayor of London attached as Appendix C4 .

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

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

The council with this policy are actively discriminating against residents in Mitcham because their policy does nothing to help improve air quality or public health. The report only seeks to improve public health in areas of the borough already acknowledged to have better health levels. Your policy will condemn residents in Mitcham to worse air quality and will do nothing to help bridge the gap. In fact you are making it worse.

Officer response

There is no active discrimination against residents in Mitcham.

In cases where there is a reasonable opportunity to use public transport, or indeed walk or cycle, Merton's aim is to encourage everyone to use these options over the use of a motor vehicle. Generally, charges have been set higher where there is good transport links over less well-served areas. This is applicable to the proposed charges in CPZs, on street and in our car parks.

There is a significant difference in transport infrastructure and accessibility depending on where a resident lives, visits or works within the borough. This is presented in the form of a 'Public Transport Accessibility Levels' (PTAL) as set out by TfL and formed part of the review. TfL have grading's for each area of London – ranging from the highest to the lowest.

It is therefore easier in principle for a person living, visiting or commuting to a high PTAL rated area to use alternative sustainable of transport, compared to residents in low PTAL rated areas.

Furthermore there is less access to public transport in the East so residents have less discretion over their mode of transport

The policy will not condemn residents in Mitcham to worse air quality. The council is doing a great deal to improve air quality through its AQAP. The AQAP has over 70 actions, of which parking policy change is only one.

Regarding bridging the gap, the Health and Wellbeing Board has endorsed the East Merton Model of Health and Wellbeing, which will address the lower life expectancy in the East in the long term. Some of the specific projects which implement this are:

- The redevelopment of the Wilson Hospital as a health and wellbeing campus
- Prototyping of social prescribing for Merton starting with general practices in the East
- Focus on activity in the East in the forthcoming Merton Year of Physical Activity
- Siting of the Merton Mile in Figg's Marsh

(d) a presumption in favour of openness;

- *This decision to increase the cost of CPZ permits has been taken and put*

to a consultation that will not have a bearing on the outcome of the decision. The current Cabinet Member has publicly stated at the Wimbledon Community Forum in March that 'it is a consultation not a referendum'.

- Over 3,000 residents, numerous resident associations and many local businesses commented negatively during the consultation. No consideration has been given to their responses which support scrapping the charges. The council has therefore not listened to any group who have decided to engage with the consultation and has therefore displayed a close minded approach, and has shown that the decision has not been made through an open process of engagement.*

Officer Response

A statutory consultation of this sort is, as enshrined within existing legislation, not vote and therefore the numbers of responses is not a key factor in itself. A statutory consultation is an opportunity for members of the public and organisations who do not support the proposals to express their objections and the Council is required to give weight to the nature and content of representations and not necessarily the quantity of them. Therefore, it is the reason for the objection that is important and that must be considered.

Members considered the responses made during the formal consultation process alongside further references and considerations raised by the Sustainable Communities Overview and Scrutiny Panel.

Further to the consultation process, Members agreed to the proposed charges set out in Appendix 7 of the Cabinet report including the following amendments

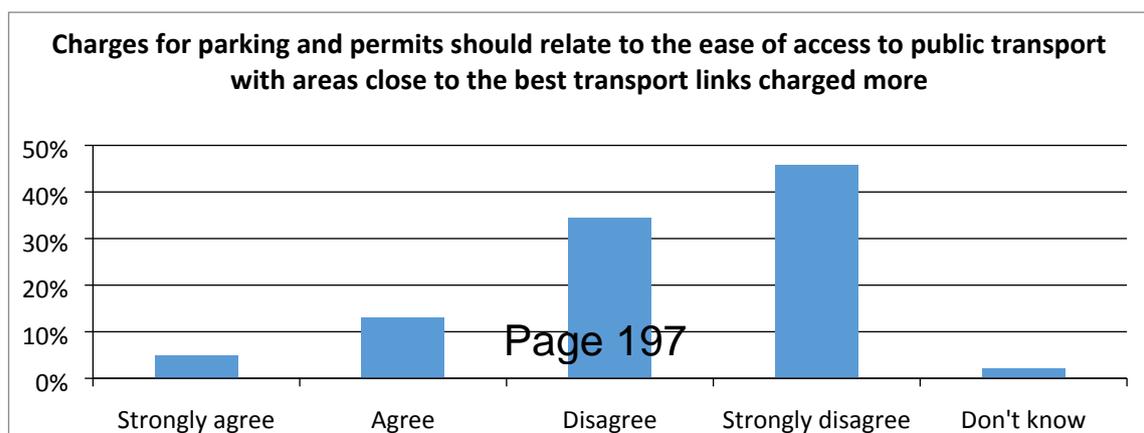
(i) Controlled Parking Zones: VNE, VNS, VN, VQ, VSW, VSW1, and VSW2, be re-categorised from Tier 1 to Tier 2 (as set out in Appendices 7 d & e)

(ii) That off street car parking charges in Queens Road Wimbledon and St Georges car park are reduced from the current £3 flat rate fee from 6.00pm to 11 pm to a £2 flat fee (as set out in Appendix 7 b).

Resident permit charges have been frozen since 2009, which means in real terms they have reduced in price for 10 years.

The review considered an appropriate price to be one that challenges motorists to consider the use of other more sustainable forms of transport.

The sale and price of permits is another way the council can influence car/vehicle use within the borough and directly contribute to the MTP, LIP and AQAP objectives.



A number of residents highlighted the lack of public transport in specific areas of the borough. Representation highlighted that in some CPZs there could be more than 20-minute walk to reach a main line station or underground station. Although buses may provide alternative transport, it is accepted that access to public transport did vary within each area of the borough. The recent Residents survey referred to the provision of public transport within the borough, as being the most highly valued.

In reviewing the PTAL rating for each CPZ and further analysing walking distances to main line, tram and underground stations access, it is agreed that Controlled Parking Zones VNE, VNS, VN, VQ, VSW, VSW1, VSW2, be re-categorised as Tier 2 from Tier 1 as shown in Appendices 7d – 7f.

At all of the Cabinet meetings, the council has signified its intention to keep all of the parking charges under review over the next 12 months.

- *The decision has been sent through the scrutiny process even though the decision has already been made in the Leader's Strategy Group and Cabinet in December. This was shown in the sustainable community Overview and Scrutiny Panel papers in January which showed the inclusion of the Parking Charges increase in the Budget papers which listed the £1.9 million charge increase per annum.*
- *Following the publication of the responses to the consultation, it is clear that the perception of residents is that this decision has been taken predominantly in order to generate revenue for the council.*

Officer Response

Any increase in parking charges will inevitably have an effect on parking income. This is difficult to accurately predict since we are seeking to change motorists' behaviour and reduce car usage. As such, the current Medium Term Financial Strategy (MTFS) savings of £1.9m in 2019/20 and a further £1.9m in 2020/21 reflect assumptions on estimated decreases in demand across each income stream e.g. resident permits, visitor permits, pay etc. These are a best estimate at this stage taking into account the changes proposed and the potential changes in motorists' behaviour that we expect to see.

The estimated 2019/20 income of £1.9m is based on an implementation date of 1st October 2019. The overall level of income that will be achieved will be dependent on the actual implementation date and level of charges agreed following due process and consideration. It is important to note that the raising of income is not a contributing factor to any decision making process and, therefore, the income figure will be reviewed again following any decisions taken.

Local authorities are not permitted to use parking charges solely to raise income. When setting charges we must instead focus on how the charges will contribute to delivering the Council's traffic management and key sustainability objectives.

In terms of any income that may be generated by the increased charges, the Traffic Management Act 2004 amends section 55 (4) of the Road Traffic Regulation Act 1984 and directs that income should be used:

- (a) To make good any payment used for parking places,
- (b) For the provision of or maintenance of off street parking (whether in the Open or not) and
- (c) Where off street parking provision is unnecessary or undesirable:
 - (i) To meet the costs of provision of or operation of public passenger transport services, or
 - (ii) For highway or road improvement projects within the borough, or
 - (iii) For meeting costs incurred by the authority in respect of the maintenance of roads maintained at the public expense by them,Or
 - (iv) For the purposes of environmental improvement in the local authority's area, or
 - (v) Any other purposes for which the authority may lawfully incur expenditure.

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

However, for the reasons set out above Members must disregard any benefit in terms of the revenue that may be generated by these proposals when making the decision as to whether to proceed or not.

(e) clarity of aims and desired outcomes

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

Officer response

Every year the Pollution Team produces a statutory return called an Annual Status Report (ASR) This document details the monitored levels of pollution in the borough and shows that we are exceeding our objective levels in all areas of the

borough.

The overwhelming contributor to pollution is traffic and transport.

In Merton, an Air Quality Management Area (AQMA) has been declared for the whole borough with four locations identified as having high levels of pollution and human exposure. These are in the main centres of Mitcham, Morden, Raynes Park and Wimbledon.

Poor air quality in Merton comes from a number of sources, but our legal exceedances are almost entirely due to road transport. Road transport accounts for approximately 60% of emissions of NO₂ in our borough. Simply put, this is due to traffic including the nature of vehicles on our roads, the volume of vehicles and the number of trips that they take.

A number of representations highlighted a range of traffic and road safety issues/concerns, often with a link to the likelihood of individuals choosing cycling and walking over the use of a car. The point was also made that through traffic as opposed to parked cars were the primary contributor to poor air quality. There were also comments about HGVs, Taxi's, buses and other transport being a contributor to the problem, and that the council should look to address these issues.

The Council acknowledges there is no one simple solution to the growing problem of poor air quality and other transport related matters caused by increased car ownership and general traffic with the borough and London more widely. The Council has a duty and we are addressing the many concerns in respect of 'other factors', which contribute to poor air quality and congestion.

The Council will continue to lobby Government and work with TfL to reduce HGV emissions. The Mayor of London is taking action with the new Ultra Low Emission Zones, which has the ambition to push the change towards cleaner and less polluting vehicles as quickly as possible.

Please also refer to the Leaders letter recently sent to the Mayor of London.

The Mayor of London's ambition is to make London a zero carbon city by 2050. As a local authority Merton will be following this lead in improving air quality and consider initiatives such as the ULEZ charge which targets older and higher polluting diesel and petrol vehicles. Processes are in place to phase out purchasing of diesel buses; introduce hybrids and electric buses; Retrofit scheme outside central London. As of 2018, all new black taxis must be zero emission capable and given that these vehicles cannot be older than 8 years, the phasing of existing air polluters is inevitable. We are also working with TfL to identify suitable sites Rapid Charging points for taxis.

The London Mayor is committed to making London's bus fleet cleaner with all TfL buses expected to be electric or hydrogen by 2037. The Council believes that TfL's bus replacement does not go far enough and should be accelerated so that the whole of greater London can enjoy the benefits of cleaner buses much sooner. It will continue to lobby TfL to make buses in Merton cleaner.

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

Officer response

See response to the paragraph above.

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

Officer response

A copy of the Councils Air Quality Action plan is attached at Appendix C2 which shows the full extent of the Councils actions to deal with the pollution hot spots across the borough including Mitcham and Morden.

This measure is considered to be 'High Priority' and 'High Benefit' by the GLA our governing body. It is difficult at the onset of such a policy to predict the outcome and direct benefit on ambient air quality; this can only be established as the impact of change becomes apparent and assessment of monitored air quality trends over a period of time. As data becomes available, this change can be reviewed and assessed against tail pipe reductions as the policy develops.

This policy supports a multi-faceted approach to tackling air quality in the borough. It is not the only measure the council is taking and needs to be considered in the context of a comprehensive plan to tackle air quality.

(Refer to Appendix C2)

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

Officer response

The answer set out in section 'd' above covers how parking charge income can be used.

- *The report does not make any real display of what desired outcomes would be other than trying to reduce the number of permits issued. There are no specific measures to define what reductions of emission are aimed for, what metrics on increased public transport use, and no indication of what metrics will be used to measure the increase in public health across the borough.*

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

Officer response

As part of the information provided during the consultation period, residents, business associations, visitors, resident associations and organisations were directed to a proposed list of measures of success that the council could consider using for the future.

Ultimately, the outcome the Council is aiming for, is improved health and wellbeing of our residents, visitors and those who work in the borough. We know this will take time and effort from many other organisations. Merton are however committed to do what we can. There are some things we can measure to make sure we focus on developing a more sustainable transport strategy over the coming years, which include:

- Reduction in congested areas of our high streets
- Reduction in CPZs / permits issued, including visitor permits, including:
- Reduction in multiple permits sold to the same house
- Reduction in the number of season tickets sold
- Investment in infrastructure and sustainable transport solutions:
- Number of additional electric charging bays
- Number of additional cycle routes
- Number of additional cycle parking facilities
- Greater use of public transport journeys within the borough
- Increase in the number of 'active transport' activity in the borough:
- Number of walking journeys in the borough
- Number of cycling journeys in the borough

It is anticipated that these measures will be used over the coming years to determine the success and levels of the councils parking charging policy and how this contributes to less air pollution.

Public health:

Along with air quality a key objective is to contribute towards improved public health of Merton and London's residents. There are many factors beyond our control but we are committed to working with colleagues in Public Health and shall monitor progress.

The answer set out in section 'd' above covers how parking charge income can be used.

Notwithstanding this we can apply revenue to supporting the delivery of the Air Quality action plan as well as maintaining our commitment to delivering infrastructure in the borough.

(f) consideration and evaluation of alternatives;

- *No significant thought or effort seems to have been given to alternatives. There are other areas the council could focus on to bring down high levels of air pollution, instead of placing an additional burden on some residents*
- *This appears to be a single-minded exercise to raise extra income with no specific alternative having been tested or considered.*

Officer response

We refer Members to the Air Quality Action Plan shown in Appendix C2.

- *There is no explanation of how this solution came about, was it even in the labour manifesto at last year's council election and what other alternatives or ideas did the cabinet consider or not? Before settling on this solution what choice of options were there, or were they dismissed due to not providing the level of revenue needed to fill the budget gap.*
- *We believe the council should fully investigate other options that are less of a blunt tool and will have a greater impact on the air pollution issues facing the borough before confirming this decision hence the reason for the call in.*

Officer response

We refer Members to the response above; this was a policy that is clearly linked to our Air Quality Action Plan Appendix (C2), a Plan that has been in place for some time.

Documents requested.

- *Consultation materials sent to equality group stakeholders*
- *Evidence relied on to formulate policy*
- *Consideration of alternatives*

Officer response

These are all referenced within the report.

- *All papers provided to the Director of Environment and*

Regeneration/Director of Corporate Services/ and relevant Cabinet Members prior to, during and subsequent to the decision making process on parking charges increase.

- *All emails, reports and associated documentation relating to the decision on parking charges provided to the relevant Cabinet Members, Leader of the Council, Chief Executive, Director of Environment and Regeneration, Director of Corporate Services and other council officers.*
- *Meeting notes of all meetings between officers / Cabinet Members and any third parties on the parking charges increase.*

Officer response

These are available to councillors on request via Democratic Services.

- *Any correspondence between the council and organisations lobbying on the parking charges increase.*

Officer response

A copy of the consultation responses are available to councillors on request via Democratic Services.

- *The Equality Impact Assessment (or any other equalities analysis carried out) in relation to the parking charges increase.*

Officer response

These are all referenced within the report.

- *The risk analysis conducted in relation to the parking charges increase.*

Officer response

This is available to councillors on request via Democratic Services.

- *Detailed financial analysis of the parking charges increase, and in particular the impact on council revenue over the medium term.*

Officer response

This is provided in EXEMPT Appendix C6

Appendix C2: Air Quality Action Plan.

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

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Annual Mean NO₂ Monitoring Results

Site ID	Site Name	Site type	Valid data capture for monitoring period % ^a	Valid data capture 2018 % ^b	Annual Mean Concentration (µg m ⁻³)						
					2012 ^c	2013 ^c	2014 ^c	2015 ^c	2016 ^c	2017 ^c	2018 ^c
ME9	Civic Centre, Morden	RS Automatic	99%	99%	48 (48.1)	40.1	38 (37.9)	34	Faulty	Faulty	48
1	A298 Bushey Rd nr Bushey Ct, SW20	RS DT	100%	100%	not open	not open	not open	not open	not open	52	47.8
2 (GA)	A24 Jct with Garth Drive Morden, SM3 9HU	RS DT	100%	100%	37.5	39.6	32.8	32	32 ^d	41^c	36.7
3	A24 Jct Tudor Drive, SM4 4PE	KS DT	Closed	Closed	not open	not open	not open	not open	not open	34	closed
4 (FA)	154 Grand Drive Raynes Park	KS DT	100%	100%	34.7	37.7	43.4 (36.5)	32	39.3 ^d	37	30.4
5 (BA)	Sacred Heart Sch, Burlington Road New Malden	KS DT	100%	100%	37.2	42	32.9	28	32 ^c	42	38.0

Site ID	Site Name	Site type	Valid data capture for monitoring period % ^a	Valid data capture 2018 % ^b	Annual Mean Concentration ($\mu\text{g m}^{-3}$)						
					2012 ^c	2013 ^c	2014 ^c	2015 ^c	2016 ^c	2017 ^c	2018 ^c
6 (JC)	17 Grand Drive Raynes Park	KS DT	100%	100%	N/A	42.1	32.4	N/A	34 ^d	45	43.0
7	A298 Kingston Rd, SW20 8LX	RS DT	100%	100%	not open	not open	not open	not open	not open	44	46.0
8	A238 Coombe Lane, SW20 8NF	KS DT	92%	92%	not open	not open	not open	not open	not open	53	43.1
9	2 Lambton Rd, SW20	KS DT	92%	92%	not open	not open	not open	not open	not open	43	46.8
10	A238 Coombe Lane, SW20	RS DT	100%	100%	not open	not open	not open	not open	not open	38	43.6
11	Kingston Rd SW20 1JW	KS DT	92%	92%	not open	not open	not open	not open	not open	35	35.8
12 (RA)	Pepys Road Morden	KS DT	Closed	Closed	32	35.9	32.8	26	36	30	closed
13	B281 Cottenham Pk Rd, SW20	KS DT	92%	92%	not open	not open	not open	not open	not open	44	36.9
14 (AC)	20 The Ridgeway Wimbledon	KS DT	100%	100%	N/A	47.6	41.6 (38)	N/A	45 ^d	44	42.2
15	20 High St, Wimbledon, SW19 5BY	KS DT	92%	92%	not open	not open	not open	not open	not open	26	26.2

Site ID	Site Name	Site type	Valid data capture for monitoring period % ^a	Valid data capture 2018 % ^b	Annual Mean Concentration ($\mu\text{g m}^{-3}$)						
					2012 ^c	2013 ^c	2014 ^c	2015 ^c	2016 ^c	2017 ^c	2018 ^c
16	84 High St, Wimbledon, SW19	KS DT	100%	100%	not open	not open	not open	not open	not open	39	44.9
17 (WA)	Woodside Wimbledon	KS DT	Closed	Closed	33.3	33.7	40.5 (36.1)	25	37	30	closed
18	Hand & Racquet, Wimbledon Hill	KS DT	100%	100%	not open	not open	not open	not open	not open	64	65.6
19	Wimbledon Station	RS DT	100%	100%	not open	not open	not open	not open	not open	52	54.5
20	Hartfield Rd, Wimbledon b	KS DT	100%	100%	not open	not open	not open	not open	not open	48	55.1
21 (EA)	246 Merton Rd, Sth Wimbledon A219	KS DT	92%	92%	52.7	57.5	61.1 (50.5)	65	61^d	57	68.8
22	12-16 Upper Green West, CR4 3AA	RS DT	100%	100%	not open	not open	not open	not open	not open	77	63.7
23	183 Kingston Rd, SW19 1LH	KS DT	100%	100%	not open	not open	not open	not open	not open	61	58.3

Site ID	Site Name	Site type	Valid data capture for monitoring period % ^a	Valid data capture 2018 % ^b	Annual Mean Concentration ($\mu\text{g m}^{-3}$)						
					2012 ^c	2013 ^c	2014 ^c	2015 ^c	2016 ^c	2017 ^c	2018 ^c
24	75 Hartfield Rd SW19 3TJ	KS DT	100%	100%	not open	not open	not open	not open	not open	38	39.0
25	Alexander Rd, SW19 7LE	RS DT	100%	100%	not open	not open	not open	not open	not open	41	39.1
26	Gap Rd, SW19 8JG	RS DT	100%	100%	not open	not open	not open	not open	not open	47	45.3
27	Plough Lane	RS DT	100%	100%	not open	not open	not open	not open	not open	46	45.5
28 (BC)	11 Haydons Road SW19 1HG	RS DT	100%	100%	N/A	48.3	43.6 (42.6)	N/A	54 ^d	46	49.0
29 (HA)	A24 - 44 High St Colliers Wood, SW19 2AB	KS DT	83%	83%	50.7	52.2	49.8 (46.6)	31	49.9 ^{c,d}	61	65.9
30	A24 Christchurch Rd, SW19 2PB	KS DT	100%	100%	not open	not open	not open	not open	not open	48	50.9
31 (LA)	Alley Charminster Ave Morden	BG DT	100%	100%	24	26.1	26	17	24	20	20.5
32	Merantum Way, SW19 2JY	KS DT	100%	100%	not open	not open	not open	not open	not open	42	38.2
33	A24 Morden Rd, SW19 3BP	RS DT	92%	92%	not open	not open	not open	not open	not open	49	48.2

Site ID	Site Name	Site type	Valid data capture for monitoring period % ^a	Valid data capture 2018 % ^b	Annual Mean Concentration ($\mu\text{g m}^{-3}$)						
					2012 ^c	2013 ^c	2014 ^c	2015 ^c	2016 ^c	2017 ^c	2018 ^c
34(GC)	Western Rd Colliers Wood	RS DT	92%	92%	N/A	N/A	N/A	53	<u>64^d</u>	59	55.4
35 (MA)	Lavender Ave Morden	KS DT	100%	100%	31.4	35.2	32.2	32	39	31	31.2
36 (DC)	35 London Rd Tooting	RS DT	100%	100%	N/A	59.3	55.5 (50.2)	45	57 ^d	42	46.9
37 (CC)	107 London Rd Tooting	KS DT	100%	100%	N/A	<u>72.6</u>	<u>67.2 (54.5)</u>	<u>64</u>	<u>62^d</u>	<u>61</u>	<u>67.3</u>
38 (EC)	BHF, 265 London Rd, Mitcham	KS DT	100%	100%	N/A	40.4	38	37	39 ^d	41	44.3
39 (FC)	Church Rd Mitcham	KS DT	83%	83%	N/A	45.2	36.2	37	41 ^d	45	47.9
40	A217 London Rd, CR4 4BF	KS DT	100%	100%	not open	not open	not open	not open	not open	46	51.9
41	A239 Morden Rd, nr O, CR4 6AU	RS DT	100%	100%	not open	not open	not open	not open	not open	41	47.5
42	St Hellier Rd, SM4 6JE	RS DT	92%	92%	not open	not open	not open	not open	not open	35	37.9

Site ID	Site Name	Site type	Valid data capture for monitoring period % ^a	Valid data capture 2018 % ^b	Annual Mean Concentration ($\mu\text{g m}^{-3}$)						
					2012 ^c	2013 ^c	2014 ^c	2015 ^c	2016 ^c	2017 ^c	2018 ^c
53	A24 139 Epsom Rd, nr traffic lights, SM3 9EY	KS DT	100%	100%	not open	not open	not open	not open	not open	not open	43.1

Notes: Exceedance of the NO₂ annual mean AQO of 40 $\mu\text{g m}^{-3}$ are shown in **bold**.

NO₂ annual means in excess of 60 $\mu\text{g m}^{-3}$, indicating a potential exceedance of the NO₂ hourly mean AQS objective are shown in bold and underlined.

^a data capture for the monitoring period, in cases where monitoring was only carried out for part of the year

^b data capture for the full calendar year (e.g. if monitoring was carried out for six months the maximum data capture for the full calendar year would be 50%)

^c Means should be "annualised" in accordance with LLAQM Technical Guidance, if valid data capture is less than 75%

The above table shows the NO₂ diffusion tube monitoring results, with bias corrected values for each year from 2012 to 2018.

Note: Prior to 11th October 2017 continuous monitoring of nitrogen dioxide was measured by instrument ME1. The roadside site was located at Morden Civic Centre and suffered a series of faults during 2016, no data is available for 2016 and 2017 for this reason. A new chemiluminescent NO₂ analyser was installed on the 11th October 2017 identified as ME9.

The results in bold indicate an exceedance of the annual mean objective of 40 $\mu\text{g m}^{-3}$ and the results underlined indicate NO₂ annual means in excess of 60 $\mu\text{g m}^{-3}$ indicating a potential exceedance of the NO₂ hourly mean AQS objective. Diffusion tube data above 40 $\mu\text{g m}^{-3}$ have been corrected for distance and then bias corrected, data capture was above 75% across all sites therefore annualisation was not necessary.

Data capture for 2018 has improved again from 2017 with all sites above the 75% validity threshold. The overall data capture rate was 97%, which is very good. The reliability and accuracy of the data is therefore much improved since the implementation of the new monitoring regime in 2017.

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



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

Tel: 020 8545 3424
Mob: 07958 139 498

Email: stephen.alambritis@merton.gov.uk

Date: 22 July 2019

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

Re: Air Quality

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

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

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

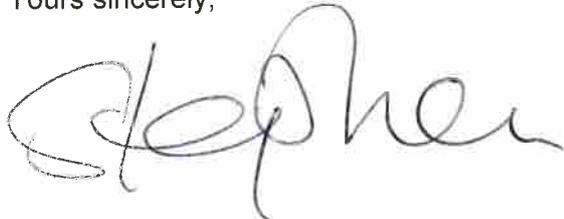
I know that my officers have raised this on several occasions with TfL but I would like to express my strong desire that the process of cleaning up of the bus fleet is accelerated right across Merton, but particularly in town centres and known Air Quality Focus Areas. With the introduction of the ULEZ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

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

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

I look forward to hearing from you

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Stephen', written in a cursive style.

Councillor Stephen Alambritis
Leader of the Council

Email sent to Equalities groups and residents.

From: Kris Witherington
Sent: 29 March 2019 13:51
Subject: Parking Consultation 2019

Dear resident

As discussed at some of the recent Community Forum meetings the consultation on proposed changes to parking charges in car parks, pay and display bays and controlled parking zones has begun today. You can find out the details of the new plans as well as take part in the consultation by going to <https://www.merton.gov.uk/parkingconsultation2019>.

You may also be interested in other events and consultations taking place.

Merton's Transport Plan: LIP3

The plan is in response to the Mayor of London Transport Plan with a focus on improving health, and improving public transport experiences. The consultation on the plan is open until 12 April. Details at <https://www2.merton.gov.uk/transport-streets/transportplanning/lip3.htm>

Boundary Review

The number of Councillors, wards and ward boundaries will be reviewed by the Local Government Boundary Commission for England in 2019/20 for the new arrangements to be in place by the 2022 local elections. They will be holding a briefing to explain the process to resident's groups and community organisations on Tuesday 2 April at 7.15pm in the Council Chamber. If you would like to attend please let me know so I can reserve you a place.

Community Infrastructure Levy Ward allocations and Neighbourhood Fund
Every electoral ward in Merton is to be given a grant of £15k for neighbourhood projects which enhance the local area. The application process will begin next week and all projects will need to be endorsed by local councillors. For larger projects (over £20000) the Neighbourhood Fund is currently accepting new bids. For more information please see <https://www.merton.gov.uk/planning-and-buildings/planning/community-infrastructure-levy/spending-the-levy>

Sexual Health Strategy

Merton Council and Merton Clinical Commissioning Group (NHS), working alongside NHS England, are responsible for commissioning sexual health services in Merton. To inform the development of the strategy for these services we are seeking feedback on our proposed vision, priorities and actions. We also wish to know a little bit more about the knowledge and experience of sexual health services

of those who work, live, are educated in or looked after by Merton. To find out more and get involved please see www.merton.gov.uk/consultations.

Many thanks

Yours
Kris Witherington
Community Engagement Manager
Communications Team
Merton Council
020 8545 3896

Dear Councillors, Resident Associations and Business Associations.

Re: TMO Consultation Reference: PARKING CONSULTATION 2019

As part of our statutory consultation process please find attached:-

1. a notice of proposal relating to proposed changes to charges and season tickets for parking in off-street parking places (Merton run car parks); and
2. a notice of proposal relating to changes to on-street permit charges and pay & display charges to be advertised on 29th March 2019 in the Wimbledon Times and the London Gazette by Merton Borough Council, pursuant to the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996. The statement of reasons and plans of the different charge zone/tiers are also attached.

More information can be found at www.merton.gov.uk/parkingconsultation2019 from 29th March 2019. Should you have any observations or any objections to the proposals, please do so through the councils web pages no later than 5th May 2019.

Yours
Kris Witherington
Community Engagement Manager
Communications Team

Written submissions received from residents associations and individual residents

Residents Associations

South Ridgway Residents Association - William Petch, Chairman

I am chairman of the South Ridgway Residents Association, we have approximately 420 members. I would like to object on their behalf to the Council's proposed rise in parking charges on several fronts.

This whole scheme is patently obviously a tax grab hidden under a green umbrella. I suspect we are supposed to feel grateful the Council are exercising their duty of care over the purity of our air. There is however an unpleasant smell of political bias and variations in parking charges between different geographical areas are divisive indeed undemocratic especially when based on some very flimsy sophistries.

A good number of our members are elderly, infirm and live alone. They rely to a huge extent on visitors who can park near their homes for a reasonable charge. This proposed rise in fees will cause more isolation for the aged and vulnerable. Also many of our older members, not blue badge holders, rely on a car for everyday transport.

Cars are important for young families with children and all the accompanying paraphernalia. Public transport to hospitals is not good. We have two members who often have to take their husbands to hospital and they need a car and as a result a residents parking permit.

Our high streets are dying. This is not going to be helped by a rise in meter charges and with the death of the high street and the resultant rise in on line shopping we will be over run by even more white vans, hardly beneficial on the polluting front.

One of the Council's justification for the variance in charges is the PTAL rating. Large parts of Mitcham have the same PTAL rating as parts of the South Ridgway area, neither has particularly easy access to trains, yet strangely these parts of Mitcham are not to be subjected to the same price rises as the South Ridgway area.

I would ask the Commission to ask the Council to think again.

Edge Hill Area Residents' Association - Sally Gibbons, Chairman

Merton Council's proposed increase in parking charges is not just a local tax, it is a discriminatory local tax. All residents throughout Merton should know that wherever they choose to travel within the Borough, parking charges will be uniform. After all, we all move around of our own free will, and just because a car is parked in a particular street does not indicate that the owner lives there.

To refer to the Edge Hill Area RA specifically, this covers a small area of Hillside Ward, and residents are lucky that a large proportion of the local accommodation (although not all of it) benefits from off-street parking. However, the on-street parking bays are full to capacity during working hours, and especially so during school term times. This is because there are three schools within the area, one large secondary and two preparatory. These all require parking for teachers and for school support staff, some of the most vital workers in our community, and who often have to travel some distance carrying books, equipment, etc., in order to get to work.

We also have quite a high proportion of elderly residents – in fact, a new block of flats specifically to house the over-55s, has just been completed in the area. This increases the need for peripatetic workers such as carers and home helps, also vitally necessary community workers, and often some of the lowest paid. We all recognise their need for cars to enable them to spend the maximum time available with their many clients. Friends and family also like to visit the elderly (and, indeed, are encouraged to do so by Merton Council).

Edge Hill also houses the Church of the Sacred Heart which, with its own Community Centre next door, is one of the largest, most active churches in the area. It also stands on the steepest part of the already steep hill, and while there is an off-street parking area, it is not especially large, so that when there is a service, funeral, marriage or event at the Community Centre, all of which are frequent, the on-street bays are once again packed to capacity. Much of this transport is for elderly or disabled members of the congregation, who find the walk up the hill seriously difficult, or for families with young children.

For the elderly or disabled in our area, coping with public transport for essential travel is a serious problem. I have, myself, recently had cause to visit St George's and Queen Mary's hospitals by public transport, and both require either a 15 minute walk and then a bus journey, or two bus journeys – and for St Mary's I also had a 20 minute wait, in the rain, for the bus connection. The return journey is the same, and there is no way to avoid walking up the hill at some stage of the journey. As an asthmatic, I need two stops for breath to walk up Edge Hill! This is, of course, a problem that we share with a large proportion of Hillside Ward, and there is no public transport available at that point of the journey.

It seems, therefore, that this hike in parking charges will have most impact on the elderly or vulnerable and workers or visitors from other areas. Is it really the Council's intention make life more difficult for the vulnerable, to penalise low-paid but vital community workers going about their employment, and to place an extra burden on churchgoers?

So far the Council has entirely failed to produce any firmly based evidence that increasing parking charges will improve air pollution, and there are other ways of improving the air quality which will work much more quickly. Instead of penalising those least able to afford an increase, they would do better to offer sensible and workable incentives to enable residents to invest in more eco-friendly cars.

Individual residents

Resident – Pendarves Road

I understand there is to be a special meeting to consider a challenge to the proposed scheme.

I recognize that the scheme will raise substantial revenue, but it is not clear what is to be done to improve air quality.

May I respectfully insist that the revenue raised be **hypothecated** for the provision of electric car charging facilities for residents who live in terraced houses and thus do not have their own off-street charging opportunities.

The current strategy appears to be to provide of providing points where electric cars are already known to be registered. This of course does not lead emission reduction. People may migrate to ULEVs if they know they can charge them with acceptable convenience.

Resident – Melbourne Road, Wimbledon

I am writing to state my very strong objection to the council's proposed increase in residents' parking charges, for the following reasons:

1. There is no evidence that increasing parking charges will improve air quality.
2. The charges are discriminatory, with some areas being charged a higher percentage increase than others. Notably, traditionally labour voting wards are being charged less.

It is very obvious that the council are trying to raise revenue by pretending to care about air quality. If the council really cared about the quality of air their residents breathe, they shouldn't have agreed to build the Harris Academy next to one of the most polluting roads in London. Double standards or confused strategy on cleaner air policy?

The proposed parking increases should therefore be rejected immediately.

Resident – Cochrane Road, Wimbledon

In response to the Council's suggested price hike.

Firstly, I strongly object to this increase given that if the Council are unable to produce cold hard proof that this will decrease pollution, then it is pure conjecture at this point.

Secondly, as a resident who has lived here for over 34 years, I do not drive into the town centre. I live a mere 7 minute walk away!

This is a despicable way of punishing anyone who didn't vote Labour, is an unsubstantiated claim on which to base their promotion of this hike and completely unacceptable to residents.

The Government, having heavily promoted the merits of buying diesel vehicles a few years ago, have now done a complete U-turn. But my husband now owns a van for his work. Now it is considered the worst kind of vehicle and you penalise residents with yet higher and higher prices to park. He is not in a position to buy whatever the Government has decided is the next Best Thing Since Sliced Bread on the back of their mis-informed guidance.

This increase should not, and must not be allowed to be implemented.

Resident – no address given

The insane price hike on the annual parking permit for visitors is basically a tax on carers. I use this pass for my nanny who cares for our 2 year old twins and 11 year old daughter as well as sometimes having her own daughter with her. She needs the car to get to and from work in a timely fashion, you cannot rely on the trains since her arrival directly impacts on the time I can leave and on inclement days she needs it get the children from A to B. Whilst we try and use public transport wherever possible it isn't always practicable especially with twins.

This also impacts on those caring for the elderly or disabled or anyone else who needs regular help.

Resident - Chase Side Avenue

1) I support the overall aims of the proposal in terms of cutting vehicle related pollution and congestion

2) I am perfectly prepared to pay the additional charge although I am concerned about how additional funds will be spent given the constraints of RTRA 1984. The scheme is very unlikely to cost any more or run than it does at present.

3) I feel the patchwork implementation is unlikely to yield favourable results. CPZs discourage car journeys from outside. There is nothing in the proposal to discourage journeys to areas of the borough where CPZs are not in place.

4) The consultation seemed flawed. Statement such as "cars add to pollution by cruising around looking for a parking space" need to be supported by evidence. The highest correlation with congestion and pollution seems to be busy junctions. The problem is through traffic not lack of parking. Council has not shown evidence on how this will improve.

5) The optional nature of the CPZ rollout (as stated in April 2019) puts a limit on any benefits to public health which can be delivered. I cannot see a majority of residents volunteering for escalating charges. It makes more sense for permits for on-street parking to be compulsory and affordable with strict enforcement of transgressions.

6) better cycle infrastructure and accessibility improvements at stations are badly needed in order to connect with neighbouring boroughs.

Resident – Rayleigh Road

I am writing again to complain about Merton Council's proposed increases to parking charges, specifically that the proposed charges will vary according to where people live and that they will be targeted mainly at people who live in areas that do not elect Labour councillors. This is in relation to the Liberal Democrats' recent formal challenge to the Council's 2019 plans.

But while writing, I would like to repeat my earlier complaint (January 2017) concerning the additional surcharge on all diesel vehicles registered in Controlled Parking Zones in Merton. I remain very angry about this.

1. Firstly, I am somewhat surprised the Council had the powers to do this. When the controlled parking zone in Rayleigh Road was brought in, my understanding was that the charge was to allow me to continue to park my car in the road (which had been free up to that time), and that the revenues would be used to cover the administration costs, not as a way of raising revenue for the Council, for which there is an established route - the Council tax. The levy is now being used to raise money, albeit that the Council has said that the money is being spent on "tackling air pollution, local sustainable transport initiatives and necessary infrastructure such as cycle lanes". Isn't that what the Council tax is for?

2. The surcharge being levied is exorbitant - now £150 per annum for a diesel car in CPZ 5F. This is considerably higher than the charges for diesel cars in other London boroughs. How were these figures arrived at?

3. The Council will rake in money and then have to find ways to spend it, whether or not that expenditure is warranted.

4. As I understand it, the Council also ignored the advice of its own consultants in not consulting with residents on the impact of such a high a surcharge, with it being argued that residents could seek to avoid it by concreting over their front gardens to create more off-street parking.

5. Is it really Council policy to encourage residents to concrete over the front gardens? This is environmentally unsound as (on a large scale) it will result in fewer plants, less wildlife, less CO₂ absorption, and additional water run-off into the roads and drains, leading to flooding. Was this impact assessed?

6. I strongly suspect (and I guess the Council does not know either) that most of the diesel pollution that is in Merton air comes from buses, taxis, vans, and those (plus

cars) that originate from outside Merton – none of which are subject to the levy. So the impact of the levy on the quality of Merton air must be small.

7. The levy does not apply to a large house with a forecourt (and maybe several diesel 4X4s) and with a let-down into the road that stops anybody else parking in the road. How fair is that?

8. I agree that the polluter should pay. However this scheme is far from meeting that aim. It bears no relation to how much pollution any one person/car actually creates; it would be much better to raise money (if it is needed), and to change behaviour, via a general increase on the duty on diesel fuel. (And for central government to pass that on to local Councils, ideally in a way that relates to the actual pollution in each borough).

9. It seems quite possible that at some point Central government will act further to make diesel vehicles less attractive, and then Merton residents will be hit by a double-whammy. Would the Council then withdraw the levy? (I bet not).

10. My diesel car is a 2015 Skoda. It meets the Euro 6 standard. Such cars are deemed sufficiently 'clean' not to incur charges for entering the London Ultra Low Emissions Zone and are not eligible for road tax. (In addition, in France, my car comes under the 'CritAir' 2 category (yellow sticker), the second cleanest after electric and hydrogen-powered vehicles). On what basis does Merton take a different line?

11. As you know, the Government has for many years encouraged car buyers to buy diesel-powered vehicles on the grounds that they were better for the environment (global warming) as they emit less CO₂ than petrol. Diesel car owners are now being penalised for following this steer. Cars are expensive and are not something most people sell and buy frequently, at least new ones. And the second-hand value is likely to fall.

12. Finally, if the Council wants to reduce pollution in Merton, it should remove all the speed bumps. These have been shown to increase pollution as vehicles tend to brake as they approach them and then accelerate away. It should also replace all diesel buses with electric or hydrogen-powered ones.

Is Labour hoping for my vote in the next local elections? It would appear not.

Resident - Alverstone Avenue

I have decided I am going to give up my car in October so won't be troubled by the huge increase in the parking charge for my car. I am however very concerned about the proposed hike in the charge for visitors permits. This directly affects the elderly (me), young families and disabled people and over the course of a month could be another hefty bill. This from a so called Labour Council. Perhaps the charge in this neighbourhood could just go to those who have extended their property and we poorer people could have the same cost as the rest of the Borough!!

Resident – no address given

Please rethink this change, as it will prevent more and more shoppers etc visiting Wimbledon . It is already a nightmare to know where to park and when without getting a parking ticket/fine. That's without the tricky/confusing road signage when turning left near a bus lane. Merton are shooting themselves in the foot and being very shortsighted . I will go to Kingston more to shop and socialise or shop online.

Please rethink this increase of parking fees . Us drivers are already being penalised for having non green vehicles surely that's enough for now!

Resident – Thornton Road/Denmark Road

I currently live in Thornton Road SW19. At the time of the vote by residents to decide on whether residents parking would be introduced locally, I lived in Denmark Road SW19.

Prior to the vote, I distinctly recall that the information which was sent to residents such as myself clearly stated that the monies raised from the scheme would only be used to cover the costs of the administration of the scheme. Local residents made an informed decision on how to vote, based on that precise information.

We are now told, with no further residents vote, that there will be a significant increase in the cost of permits. Additional monies raised will be used to "improve air quality". At a minimum, this is a very important breach of trust. Additionally, I also question whether this is legal, given the original premise on which the vote was based is being completely ignored.

Resident – Strathearn Road

I am writing to register my opposition to the proposed increase in residents parking permit charges in Merton.

As I understand it, these increases have been justified as a means to persuade residents to give up their cars and use public transport, in order to reduce air pollution. However, this is neither practical nor logical.

In my case, I do not drive around the borough very much, but my wife requires a wheelchair which has to be taken in the car when we do go out. Public transport is not an option for us and for many others. So the increased charges will not result in us giving up the car and will be a needless additional burden on two pensioners.

If the council is serious about reducing air pollution from vehicles, it should pay attention to commercial traffic. I walk down Alexandra Road almost every day, and I always see three or four large refuse and rubble lorries owned by Cappagh pass down the road in the ten minutes that I am there - and the same number coming back in the other direction. This is a continuous all day traffic through the borough from Cappagh and Reston Waste which is contributing hugely to air pollution along

this residential road. Why can't the council take action against this instead of penalising residents?

Kindly take note of my objections.



London Region: PO Box 62, Chislehurst, Kent, BR7 5YB
Tel: 020-8295-0378;
www.freedomfordrivers.org

London Borough of Merton
Overview and Scrutiny Commission

1 August 2019

Public Health, Air Quality and Sustainable Transport – A Strategic Approach to Parking Charges

I refer to the above report and the proposals therein which the Overview and Scrutiny Commission are considering on the 14th August. Our comments are as follows – numbered as per the paragraphs in the Cabinet report:

2.8 Adopting a parking charge policy that is aimed at reducing car ownership and usage across the borough is unreasonable and will prejudice many people who rely on private cars for many journeys. In the borough public transport is not readily available in all locations and at all times which is one reason why car ownership is so high in the borough. Even when public transport is nearby for a borough resident, it does not mean that it is available at the other end of any journey many of which will stretch far outside the borough. There are also many people who cannot easily use public transport such as the disabled or elderly.

No doubt the general health of the population would be improved if they took more exercise but that needs to be encouraged by education, not by dictating what transport modes are used.

3.1 The allegation that 9,000 Londoners die a premature death through poor air quality is an unsubstantiated allegation that is simply not true. It is a gross distortion of the scientific evidence. The ABD has recently published a document entitled "Air Quality and Vehicles – The Truth" which spells out facts. It can be obtained from this page of our web site: <https://www.abd.org.uk/air-quality-vehicles-truth/>. Even if all air pollution was removed from London (and that would mean removing all vehicles including buses, trains and airplanes, most business activity, most home heating, etc), lives would only be lengthened by a few days. That's ignoring the fact that a lot of the air pollution in Merton blows in from outside the borough.

3.8 Increasing the differentiation in permit charges between different types of vehicles will have miniscule impact on air pollution, on climate change, on people's choice of travel mode, or on anything else. There is no evidence that such policies have had a positive impact in any part of the UK despite many such claims being made.

The Alliance of British Drivers is the operating name of Pro-Motor - a not for profit company limited by guarantee.
Registered in England No. 02945728. Registered Office: 4 King Square, Bridgewater, Somerset TA6 3YF.

It is also unreasonable to target these policies solely on those who have to park on the street when those with off street parking are not affected at all, and vehicles travelling through the borough from elsewhere are not affected either. Bearing in mind that a high proportion of higher polluting vehicles are buses, HGVs and LGVs which may well come from outside the borough, you can see that the focus on cars subject to permit charges is misconceived and irrational.

This was covered in my previous letter to the Council in December 2016 when higher permit parking charges for diesel vehicles was being considered. I have attached that letter to this one to avoid repeating the same facts.

3.16 The claims noted about respiratory and cardiovascular disease, dementia and cognitive impairment in children are based on very limited scientific reports that are not substantiated by wider evidence. Such reports are often badly researched and based solely on epidemiological evidence that is subject to biases of various kinds that are often not excluded by incompetent researchers.

The claim that diabetes is rising due to sedentary lifestyles is grossly misleading. Diabetes is certainly related to excessive weight but this is primarily diet related, i.e. people are eating too much and the wrong kind of food. As anyone knows who has a weight problem, exercise can only contribute in a very minor way to weight reduction.

3.31 Cycling usage is not growing as pointed out. There is no evidence that encouraging modal shift has any effect on the level of cycling.

4.45 There is some justification for increasing parking charges to keep pace with inflation in administration and enforcement costs. However, the level of proposed increases in Merton is unreasonable as many residents have apparently told you. There is no justification for such increase and it will impose unreasonable hardship on many residents, particularly those who have no alternative transport facilities or capabilities. Some increase may be justifiable if permit parking charges have not increased for some years as alleged, but to double or almost double the charges for a facility upon which many residents rely is not fair nor reasonable.

5.37 I note the strong opposition to the proposals in the consultation findings which Councilors should not ignore. Public consultations are about obtaining the reasoned views of the electorate and should not be ignored simply because Councilors have their own pre-conceived prejudices on the issue. I also note the strong opposition to parking charges being related to ease of access to public transport.

8.1/8.10 The report correctly spells out the legal position regarding parking charges and "revenue raising". The latter is clearly illegal as determined by the *Cran v. Camden* case and subsequent ones. Unfortunately there is nothing in the report that spells out the current revenue from parking to the Council versus the projected revenue taking into account the revised permit parking and other charges. That information should be provided as evidence that the proposals are not based on a revenue raising consideration, in whole or in part, which I every much think is likely to be the case.

To summarise, the proposed changes in permit parking charges are based on a false premise that increasing charges will improve the health of the population, reduce air pollution and otherwise improve the environment. None of those claims are likely to appear in reality.

The proposed increases are simply unreasonable.

Yours sincerely

Roger Lawson
Campaign Director

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Love Wimbledon

5th Floor Tuition House

27 – 37 St George's Road

Wimbledon

SW19 4EU

Merton Council Parking Consultation

Love Wimbledon response to Overview and Scrutiny Commission

August 2019

Love Wimbledon BID is very disappointed to see the results of the consultation about parking charges reflecting only one change in response to the feedback received. The only amendment made for Wimbledon town centre is in fact a negative one!

Fundamentally, have no doubts that Love Wimbledon is very supportive of initiatives that are likely to improve air quality. We have been working closely with Sustainable Merton, Merton Council and Greater London Authority (GLA) to understand the issues and apply for funding and support air quality initiatives within the town. However, we do not believe the proposals outlined in this consultation will tackle air quality and certainly not give it the urgency that this issue requires.

It should also be questioned why there are no targets being placed within this strategy to measure the impact of this strategy on air quality.

1. Air Quality in Wimbledon Town Centre

There are 4 primary issues in Wimbledon that each have a dramatic impact on air quality.

- Through traffic - 60% of traffic in Wimbledon is through traffic, including lots of HGVs
- Buses - 10 bus routes serve the town and all except one route (no.93) emitting diesel fumes and NOx emissions. The 156 route has some new fleet, but others emit plumes of visible smoke
- Taxis - over 200 taxis consider Wimbledon as their home rank they are all diesel and regularly are parked up idling
- School term times - during school holidays the congestion in the town is markedly reduced

Addressing any one of these issues directly will have an immediate and significant impact on air quality. For example, changing no.93 bus route to hybrid immediately reduced NOx emissions by nearly 50% in Putney High Street.

We appreciate the need to work with partners on these and we would be very happy to lobby in partnership on these issues but Merton could take the initiative and create a Clean Air Zone in the town and do this now to be proactive on tackling through traffic.

2. Support our high streets and town centres

It is no secret that retail is in turmoil and retail patterns are changing dramatically year on year. In Merton, we are unfortunately out of control of decisions of national chains but must do what we can collectively, to support our local retail centres as much as possible. With recent closures in the town (HMV, Bathstore, Burger King, Maplin and Chimichanga) our vacancy rate is increasing by the month. Debenhams could be the next closure and changes to Tesco Metro announced on 5th August Merton Council has an obligation to consider any decisions taken that could further contribute to the demise of 'the high street'. Within the last 2 years we have had 43 retail shops close down. Retailers with a physical presence are already at a distinct disadvantage with significantly higher overheads, including

extraordinarily high business rates. Collectively we need to work much harder to ensure our town centres have compelling reasons to visit them. High parking charges do not provide any incentive for people to visit the town and Merton Council should consider the unwanted side effect of this initiative and how it plans to mitigate this.

3. Proposed Parking policy and current provision

The cost of parking in New Wimbledon Theatre car park is going to increase by 100%. This car park supports the smaller and independent shops along The Broadway during the day, where footfall is already low and the evening and cultural activities in the town after 6pm.

The report refers to cars circling to find parking. I would like to see the evidence that demonstrates this. Cars wait in Hartfield Road and Broadway car parks for an available space and you cannot circle around St George’s Road, Worple Road due to the traffic directional restrictions.

Quality of the council owned car parking is also very poor, not well lit, the surfaces are sub standard and overall are not well maintained. St George’s Road car park regularly attracts anti social activity, the pedestrian entrances are unsanitary and we have been lobbying for improvements to this facility for many years.

There are also proposals within this consultation with regards to reduced prices for season tickets for the car parks which are contradictory to the policy of wanting to reduce traffic in town.

Comparisons within the report are misleading. Wimbledon is one of the very few areas across London that has parking restrictions until 11pm. All restrictions in Westminster end at 6.30pm Monday to Friday and Saturday at 1.30pm except for coaches.

Parking costs on the street in Soho are £4.90 per hour. Wimbledon is being proposed as £4.50 per hour – are we comparing Wimbledon to these destinations?

Zone	Location	Sub-zones	Price per hour
A	Knightsbridge, Belgravia and Pimlico	A1, A2, A3, A4	£3.70
B	Bayswater and Maida Vale (Sth)	BC1, B2, B3, B4, B5, B6, B7, B10, B11	£2.90
C	Harrow Rd, Queen's Park and Maida Vale (Nth)	CB1, C1, C2	£1.70
D	Victoria, Westminster and Millbank	D1, D4	£2.50
E	Mayfair and St James	E1	£4.90
F	Hyde Park, Marylebone and Fitzrovia	F1, F2, F3, F4, F5, F6	£4.90 Pre-2015 Diesel vehicles £7.35
G	Soho, West End and Covent Garden	G1, G2	£4.90

Merton Council has produced evidence that increased parking costs reduces traffic thereby improving the pedestrian experience. This research is relevant to central London, within the congestion zone and is not related to our town with significant through traffic and polluting buses. It is also important to take into account the swathes of evidence about the need to have adequate and appropriately priced parking provision to drive the local retail economy and the recommendations from Local Government Association to adopt a ‘joined up thinking’ approach, indeed there is a 29 page strategy entitled Revitalising Town Centres that refers to taking a customer led approach to parking.

4. Further proposed increases in the recommendations

In the recommendations report 5.34 references a £2 flat fee between 6pm & 11pm, which is welcomed. However this is only in two of the town centre car parks that are the most unpopular due to the poor condition and accessibility of them both. In the original proposal these were cited as being made available free of charge – so this is a further detriment to the town from the original proposal.

5. Love Wimbledon proposals

Love Wimbledon BID is ready to work with Merton Council initiatives that are going to improve the town centre, including its air quality but we do not believe that this parking strategy will have the positive impact that we are all looking for. This is demonstrated by the lack of targets and clear measurable objectives in the paper.

- Love Wimbledon is ready to discuss a strategy on personal deliveries and last mile delivery opportunities.
- Let's be part of the change towards electric vehicle adoption by providing EV charging points in the public car parks and not just on residential streets and provide reduced rate parking if not free for EV vehicles.
- Let's consider providing additional 20 minute free bays (including freeing up those outside the station from food delivery bikes, which we have also been actively lobbying for) to allow for short stay convenience shopping, particularly supporting small independent businesses.
- Let's lobby the bus companies, TfL and GLA hard to change their policies, particularly as the extended ULEZ will not impact upon Merton and is likely to attract the older fleet of vehicles.
- Can we actively support our evening and night time economy and take the pressure off the on street parking bays in the residential areas by having a flat rate after 6pm across all Merton Council car parks in Wimbledon or reduce the evening hours of operation of the council owned car parks? 11pm is punitive and unreasonable for off street parking.
- Let's work with local businesses to encourage them to change their HGV fleet or travel outside of peak times.
- Actively and collectively promote an anti-idling campaign with 20mph streets across the borough reducing emissions by eliminating aggressive accelerating.

6. Summary

Love Wimbledon believes that raising parking charges by such a high percentage will have a detrimental impact on people's perceptions of visiting the town – pushing them out to retail parks and further incentivise online shopping. We do not believe this will impact at all on air quality in Wimbledon town centre.

How is Merton Council planning to demonstrate that by raising the parking charges there will be a dramatic impact on air quality that warrants this approach? If the air quality has not improved within a year will Merton Council commit to reverting to current charging policy?

What are the quantifiable measures that will be reported against?

If LBM are truly serious about changing air quality, then let's do that and not pretend that parking charges are going to have the required effect we all seek. We need flexible and intelligent tariffs to support business particularly at this time of challenge for town centres and high streets.

Previous communications at Cabinet meetings have indicated it is important to take radical decisions and nudges are needed to change behaviour. Nudges can indeed change behaviour, let's not make these nudges detrimental to our local economy and take positive radical decisions on the strategies that we know and have been proven to have a dramatic impact on our air quality.

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Evidence base for imposing new scheme of increased charges for CPZ permits: Paper from Merton Liberal Democrats council group for the meeting of the Overview and Scrutiny Cttee on 14 August 2019

1. It's clear that a significant measure of success for the Council will be lower car ownership in the borough – largely through increased costs in residents parking permits. As the final report to Cabinet on 15 July 2019¹ notes at para 2.8:

"In setting out its measures of success, the new charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits..."

And again, at para 4.2: *"A number of comments and feedback suggested that there was no evidence to demonstrate that raising parking charges would reduce car use and lead to improved air quality. The council believes that there is evidence to show that the level of parking charges is likely to stimulate or nudge people into reducing car usage or removing their reliance on needing a car altogether ..."*

2. This note addresses the issue of what evidence has been provided to support the explicit claim that the level of charges for residents parking permits will encourage residents to give up their vehicle entirely. We also look at the issue from first principles. For the purposes of the call-in, we feel that this goes to the core of the proportionality of the decision, the evaluation of alternatives and the clarity of aims and desired outcomes.

3. The administration's basic position is that the law of supply and demand applies to the decision to own a car and therefore, ceterus paribus, an increase in the cost of running a car in Merton will reduce the number of cars owned by Merton residents: see para 4.3 of the report to Cabinet: *"The basic law of demand and supply states that more will be demanded at a lower price than that of a higher price."*

4. Similarly, this was stated in response to a question from Cllr Holden at full Council on 10 July 2019:

"The Council believes that most residents will make the right choices in light of clear information regarding the impact that the motor car has on air quality and the climate alongside sensible pricing to reduce demand (emphasis added).

5. At the same meeting there was a question from Cllr Fairclough specifically on the evidence base of the impact of residents parking permit increases on car ownership and the answer was:

"Price is a long established and recognised economic tool to manage demand. Where prices remain low demand increases, all other things being equal. Over the last 10 years where car parking and permit prices have been frozen the number of cars registered in Merton rose from 69,500 to 71,900,²

^{3 4}

¹ [Emissions, public health and air quality a review of parking charges 4](#), Merton Council Cabinet 15 July 2019

² Note: The claim that there is a link between permit prices being frozen and cars registered in Merton increasing over 10 years from 69,500 – 71,900 (3.4%) is a little odd, given that the registration of private cars in the UK as a whole has increased by 12.5% over the same period and the population of the borough by 5.3%

³ <https://www.gov.uk/government/statistics/vehicle-licensing-statistics-2018>

⁴ <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>

Decisions on car ownership take price into account. This might be at the point when a decision on car replacement is being made or at some other point in time but car owners or prospective car owners will weigh up future costs as well as alternate transport options. This administration believes that Merton is not isolated from these economic principles and that sensible and appropriate pricing strategies for parking and permits will assist in reducing car use and ownership”

6. To some degree of course this is obviously true: were the cost of a parking permit to be £10,000 a year there would be many fewer cars owned by those without off-street parking⁵. The question is whether there is evidence that the increases proposed will affect behaviour in the way needed to enable the policy to work. The assumption that has been made for budget purposes is a 20% reduction in car ownership⁶ driven by the changes, however, when asked at the Sustainable Communities Scrutiny Panel on 27 June, officers said no modelling had been carried out on the reduction of car ownership or the reduction in trips, or the ratio between the two.

7. As such, we have briefly reviewed the studies which the Council have claimed are evidence for the effect of their proposals, as set out in the report to Cabinet. In general, these look at the effect of parking pricing on whether drivers choose to make particular journeys by car or by other means, or whether they change their destination (for example go shopping somewhere else). We have not reviewed the details of whether there is evidence that the proposed increases in town centre parking will reduce traffic, but have focused on whether they support the contention that increasing residents parking permit charges will reduce car ownership.

NB: University of Leeds

8. At the Sustainable Communities Scrutiny Panel on 9 January 2019, officers referred to evidence in academic studies. When subsequently asked by Cllr McGrath what that evidence was, a paper from the University of Leeds⁷ was quoted. There is nothing in this paper which supports the view that increases in residents parking permit charges will reduce car ownership, and there are no references to the paper in subsequent Council papers.

Canadian Parking Association

9. The first is a report by the Canadian Parking Association in 2015, *The value of parking*⁸. The larger part of the 5 page paper is about effect on decisions as to whether to make a journey by car, and as they say “the pivotal point in this is the low elasticity of parking demand; this means that the percentual change in parking demand will be smaller than the percentual change in fees” – a point we will come back to.

10. There is no reference in the paper to any effects of increasing parking charges for residential parking. There is, however, a reference to a paper on the effects of private parking spaces on residential house prices in Amsterdam. It found that in areas with a long waiting list to obtain a residential parking permit, houses with private parking can be worth nearly €40,000 more. This does not suggest that increasing permit will reduce car ownership – if any implication can be drawn it is how much car owners will pay to keep their car, which hardly supports the argument that increasing CPZ charges will reduce ownership.

⁵ For the avoidance of doubt the Liberal Democrats are not proposing this

⁶ mail from the Director of Corporate Services to Cllr Quilliam, 4 February 2019

⁷ http://www.its.leeds.ac.uk/projects/konsult/private/level2/instruments/instrument025/l2_025b.htm

⁸ <https://canadianparking.ca/the-value-of-parking/>

11. Interestingly the Canadian paper does briefly cover employer-provided parking. It says “offering free, or below cost parking to employees leads to extra parking demand” – clearly the case in Merton where half the staff currently have parking permits provided by the Council.

Swedish Congestion Zones

12. There is a reference to a study of the impact of introducing Congestion charges in Stockholm⁹ - on air pollution and children’s health. It includes unreferenced (but we assume accurate) information on the effect of the London Congestion charge and the ULEZ on vehicles movements – none of these have anything to do with the effect of residents parking permit charge increases.

Theoretical Chinese Study¹⁰

13. It is difficult to understand why this paper has been referred to. It provides – from a theoretical perspective – a way of looking at how Chinese City managers can use parking price mechanisms to manage traffic. There are no specific references to resident parking permits but there is also no information on the elasticity of demand for parking, even if we could readily apply data from Chinese cities to Merton.

Report for London Councils¹¹

14. This is a comprehensive report produced by the transport consultancy ITP in 2018. It has useful information but nothing on whether increasing permit charges will reduce car ownership – this was confirmed in an e mail from the author of the report to Cllr McGrath

Discussion from first Principles

15. In the absence of any evidence, like the administration, we need to fall back on the basic assertion that the laws of supply and demand will apply. In order to consider whether an increasing in resident parking permit prices will reduce car ownership we need to compare the costs of owning a car with the increase in charges.

16. There is a curious lack of definitive data on the typical costs of car ownership. One source is ONS data on Household Expenditure¹² for households which owns a car, which shows a cost of £99.50 per week (£5,174 pa). It should be noted that this figure varies substantially by income decile – ranging from £58.20 pw for the lowest decile to £163.90 pw for the highest.

17. For ease of analyses we will take the 5th income decile, of £69.10 pw, (£3,593 pa). If we compare this with the increased charges:

New Charges	Increase	Increase as a % of 5 th income decile motoring costs
£80	£15	0.42%

⁹ Emilia Simeonova & Janet Currie & Peter Nilsson & Reed Walker, 2018.

"Congestion Pricing, Air Pollution and Children’s Health," NBER Working Papers 24410, National Bureau of Economic Research, Inc

¹⁰ *Parking Fees an Economic perspective* (The Price Mechanism Analysis of Parking Fees on Economic Perspective Liqin Shan¹ & Shaodan Qian¹ School of Management, Northwest University for Nationalities, Lanzhou, China)

¹¹ *Benefits of Parking Management in London*, Final Report, August 2018

¹² https://www.racfoundation.org/wp-content/uploads/ONS_households_with_cars_spending_on_cars_by_disposable_income_decile_201617.pdf

£120	£55	1.53%
£150	£85	2.37%

18. Members will be able to assess whether they believe a (at most) 2% increase in the cost of motoring will cause residents to decide to get rid of their cars – particularly bearing in mind the information in the Council's own evidence that motoring costs are particularly inelastic in terms of price.

Conclusion

19. The Council have been asked to produce evidence that a policy of increasing CPZ permits will reduce car ownership. They have not been able to do so, therefore should not implement this change.

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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