

London Borough of Hammersmith & Fulham

Report to: Cabinet

Date: 06/07/2020

Subject: Climate and Ecological Emergency and Covid19 Recovery – Traffic Transport and Parking Measures

Report of: Cabinet Member for the Environment, Councillor Wesley Harcourt

Responsible Director: Strategic Director for the Environment, Sharon Lea

Summary

This report sets out new transport policies, traffic control measures and initiatives that support H&F to;

- be one of the greenest Councils in the UK and carbon neutral by 2030,
- be proactive in the mitigation of the impacts of Covid 19.

Exhaust emissions from vehicles account for around 40% of green-houses gases and 50% of air pollution in London. Nationally, cities will be at the forefront of tackling air pollution and climate change in the years ahead and solving these twin challenges will mean accelerating the move to zero emission vehicles. Road traffic in London reduced by around 50% London wide during Covid19 and daily average NO₂ reduced by around 40 per cent in Hammersmith and Shepherd's Bush Town Centres. Transport and Parking policies have the biggest role to play in changing driver behaviour, reducing traffic, changing the mode of transport (modal shift) and influencing the type of vehicles people own.

The Covid19 emergency has had a fundamental impact on the way we live our lives and the need to use the public space in a different way has been brought to the fore. Through creating more space for social distancing and active travel modes on our roads, the opportunity for a green recovery from Covid19 is attainable.

The traffic measures highlighted in this report not only enable responding to the climate emergency it also gives greater agility in responding to the current Covid19 and any potential future pandemics. It builds on principles detailed on a report to the Council's GOLD and SLT boards on 05/05/2020 and 11/05/2020 respectively (Appendix 3 Gold and SLT Report COVID Response Transport Strategy)

Recommendations

That Cabinet approve:

1. The use of transport controls for the reduction in carbon emissions, the improvement of air quality and the improvement of public safety through low traffic neighbourhoods.
2. The development of a programme of Low Traffic Neighbourhoods and to delegate authority to the Chief Officer for Public Realm, in consultation with the Cabinet Member for the Environment, to approve the programme.
3. The development of a programme of healthier streets in conjunction with the schools and to delegate authority to the Chief Officer for Public Realm, in consultation with the Cabinet Member for the Environment, to approve the programme.
4. That CCTV enforcement cameras be replaced, where appropriate, with new intelligent cameras.
5. That Controlled Parking Zones be reviewed, and that authority be delegated to the Chief Officer for Public Realm, in consultation with the Cabinet Member for the Environment, to finalise the terms of the consultation and to decide upon, and implement, the most appropriate option once the consultation is concluded.
6. The preparation of the business case for Work Place Parking Levy.
7. A consultation on the introduction of Emission Based Parking Controls based on the DVLA model and diesel surcharging:
 - Option 3 of the Pay and Display Emission Based Parking Controls as set out in Table 1 of Appendix 1.
 - Option 1 of the Permit Emission Based Parking Controls as set out in table 4 of Appendix 1.
 - The diesel surcharging for Pay & Display with the surcharge rate at EB3 (50%) from Table 6, of the base tariff.
 - The diesel surcharging for Residents permit parking with the surcharge rate at EB3 (50%) from Table 6, of the base tariff.
8. That authority is delegated to the Chief Officer for Public Realm, in consultation with the Cabinet Member for the Environment, to finalise the terms of the consultation on the introduction of Emission Based Parking Controls and diesel surcharging and to decide upon, and implement, the most appropriate option once the consultation is concluded.
9. Approve e-parking and cashless parking.

Wards Affected: All

H&F Priorities

Our Priorities	Summary of how this report aligns to the H&F Priorities
Building shared prosperity	Builds a safer, healthier and more attractive borough to live and work in by reducing carbon emissions, improving air quality, improving safety by building better transport infrastructure.
Creating a compassionate council	Whilst Covid19 has contributed to premature death rates, air quality is still the biggest cause of reduced life expectancy in London. The improvement on the quality of air will have a long-term impact on the health and wellbeing of our residents. Improving the physical environment will have a fundamental improvement to residents and the biodiversity of the borough.
Doing things with local residents, not to them	Work with the Climate Emergency and Ecological Commission and the Cycling and Walking Commission for refining consultation options for the residents to consider. Low traffic neighbourhoods bring an area based approach to solving traffic issues, bring a wider group of affected people in to the consultation process.
Being ruthlessly financially efficient	Utilises new technology to reduce the cost, or be cost neutral, in delivering a carbon zero borough. Improves the green recovery of the borough from the impact of the Covid19 pandemic.
Taking pride in H&F	Being the first borough to have a fully integrated climate change, air quality and transport strategy. Implementing a green recovery from Covid-19.

Financial Impact

1. The report sets out a Climate Change Emergency Programme of proposals for transport controls for the reduction in carbon emissions and the improvement of air quality in the borough. It highlights the development and progression of a number of initiatives for which further work is required before the financial impact can be assessed. The Financial Impact, including the costs (whether capital or revenue) and funding of these projects/ programmes and any expected changes in annual income and expenditure budgets will be included in any future officer or member decision reports.
2. Behaviour change as a result of transport and parking policies is difficult to predict and model and will depend on the specific transport and parking policies implemented. This behaviour change is likely to have an impact on annual revenue budgets and any additional or reduced enforcement costs will have an impact on annual expenditure budgets. This will need to be closely monitored as part of the Corporate Revenue Monitoring process.
3. The funding of the wider programme will be agreed as part of decisions to progress each project and it is envisaged that funding sources will include funding current parking projects revenue budgets, eligible S106 agreements and CIL and will seek to maximise grant funding for transport and climate change initiatives. Where no other funding is identified, projects may need to be funded from reserves and where possible any use of reserves should be replenished.

Legal Implications

1. The report proposes the use of transport controls for the reduction in carbon emissions, the improvement of air quality and the improvement of public safety through low traffic neighbourhoods. Section 108 of the Transport Act 2000 requires local transport authorities to develop policies for the promotion and encouragement of safe, integrated, efficient and economic transport required to meet the needs of persons living or working in the Council's area, or visiting or travelling through that area, including the transportation of freight and pedestrians to, from and within their area, and carry out their functions so as to implement those policies.
2. This report proposes developing and implementing a programme of healthier streets in conjunction with the schools. The Council must have regard to s.30 2(c) of the Greater London Authority Act 1999 (as amended) which gives power to the Council to promote the improvement of environment, tackle climate change and deal with the consequences of climate change.
3. The report also seeks to replace CCTV enforcement camera with new intelligent cameras. Section 95a of the Highways Act 1980 gives the Council the power to install and maintain on or near a highway structures and equipment for the detection of traffic offences.

4. The body of the report proposes the use of camera enforcement technology in cycle lanes. Part 6 of the Traffic Management Act 2004 deals with the civil enforcement of parking contraventions. The Civil Enforcement of Parking Contraventions (England) General Regulations 2007 allows for a notice of a penalty charge in respect of a parking contravention to be sent through the post on the basis of CCTV evidence alone. S6 (e) of the Civil Enforcement of Parking Contraventions(England) General (Amendment) Regulations 2020 gives the Council the power to use the evidence from CCTV in respect of parking contraventions in cycle lanes.
5. The report also proposes changes to CPZ zones. Section 6 of the Road Traffic Regulation Act 1984 gives the Council, in its role as traffic authority, the power to make Traffic Management Orders for controlling or regulating vehicular and other traffic and to control parking by designating on-street parking places, charging for their use and imposing waiting and loading restrictions on vehicles of all or certain classes at all times or otherwise. In making such Orders, the Council must follow the procedures set in the Act and associated regulations which prescribe specific publication, consultation and notification requirements that must be strictly observed. It is incumbent on the Council to take account of any representations made during the consultation stage and any material objections received to the making of the Order.
6. The report also proposes a Work Place Parking Levy (WPL). The Transport Act 2000 Part III Chapter 2 gives the Council the power to set out the legal framework for a licencing scheme in respect of workplace parking spaces including the process for implementing a scheme and things that should be considered within the scheme. Schedule 12 sets out the financial provision of charging schemes such as the WPL. The Act requires any surplus proceeds from the WPL scheme to be spent on relevant measures that facilitate the achievement of local transport objectives. The WPL Scheme Order together with the approved full Business Case must be submitted to the Secretary of State for Transport for confirmation.
4. The report proposes to bring changes to payments for parking, introducing diesel surcharge for diesel car and pay and display emission-based parking controls. Under S.45 and 46 of the Road Traffic Regulation Act 1984, the Council can designate parking places on the highway to charge for parking in these places and to make a charge for parking permits for their use. The Council can also introduce differential permit charges between vehicles of different classes based on factors including their level and type of emissions.
5. S.122 of the Road Traffic Regulation Act 1984 sets out the consideration that must be taken into account by the Council in exercising their powers in relation to parking. The Council must exercise its powers under this section so as to secure the expeditious, convenient and safe movement of vehicular and other traffic including pedestrians, and the provision of suitable and adequate parking facilities on and off the highway.
6. These powers must be exercised so far as practicable having regard to the following matters:

- a. the desirability of securing and maintaining reasonable access to premises.
 - b. the effect on the amenities of any locality affected including the regulation and restriction of heavy commercial traffic so as to preserve or improve amenity.
 - c. the 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 Council to be relevant
7. The report proposes introduction of the permit emission schemes, which is permitted under S.36 Traffic management Act 2004 which gives power to the Council to vary a permit scheme.
8. When designating and charging for parking places the Council should be governed solely by the section 122 purpose. Charging may be justified provided it is aimed at the fulfilment of the statutory purposes which are identified in section 122 (broadly referred to as “traffic management purposes”). In reaching this decision, the Council will need to ensure that it follows all necessary consultation requirements. In doing so, the council will need to give public notice of the proposal to introduce diesel surcharging to all parking charges and emission-based permits schemes and also to take into account, before reaching its decision, representations received in response to the proposal.

Contact Officer(s):

Name: Bram Kainth
Position: Chief Officer Public Realm
Telephone: 02087531145
Email: Bram.Kainth@LBHF.gov.uk

Name: Emily Hill
Position: Assistant director, corporate finance
Telephone: 020 8753 3145
Email: Emily.Hill@lbhf.gov.uk
Verified by Emily Hill/ Hitesh Jolapara

Name: Gerta Kodhelaj
Position: Senior Solicitor
Telephone: 02087536081
Email: Gerta.Kodhelaj@lbhf.gov.uk

Background Papers Used in Preparing This Report

Appendix 3 – Gold and SLT Report COVID Response Transport Strategy

DETAILED ANALYSIS

1. Proposals and Analysis of Options

Introduction

- 1.1 H&F has declared a Climate and Ecological Emergency and committed to being carbon neutral by 2030. The biggest contributor to greenhouse gasses in the borough is road traffic. In addition, H&F is committed to reducing the exposure of people to poor air quality. The current Air Quality Action Plan identifies the Council's priorities for tackling air quality and proposes several transport actions.
- 1.2 Since the Covid19 pandemic began there has been a significant change in the use of our roads resulting in proof that lower traffic generates cleaner air and reduces carbon. As the council begins the recovery process from lockdown, the need to keep traffic reduced to support social distancing and active travel has become an emerging priority. Controlling traffic and transport will be a key activity in delivering a green recovery.
- 1.3 H&F are already taking specific action with regard to reducing traffic congestion and pollution by adopting new powers to fine idling engine motorists, providing an electric vehicle car club, installing a network of on-street electric vehicle charging points that is expanding to support residents who wish to convert to an electric vehicle and provide free and discounted permits for electric vehicles and low emission vehicles.
- 1.4 This report explores and integrated transport and climate change policy with options to further support these initiatives:
 - Reducing through traffic in residential areas,
 - increasing the use of more environmentally friendly vehicles,
 - supporting the green recovery from Covid 19,
 - promoting awareness of the issue generally,
 - supporting local and London-wide air quality targets.
- 1.5 There are only a handful of tools the council can deploy to influence traffic and parking behaviour on the public highway, this report explores in more detail the ability to create restrictions for certain types of vehicles and these should form the basis of the controls used to create Low Traffic Neighbourhoods. The broad list of measures are:
 - **Physical restrictions** - Schemes, that include measures such as road closures, to create modal filters. The borough currently does this via its Local Implementation Plan (LIP) which is approved by the Mayor of London via TfL.
 - **Time restrictions** - restrict access to roads at specific times identified such as school drop off and pick up times or street market operational times.
 - **Restrictions on types of vehicles**, with particular emissions standards, their purpose (e.g. taxis, PHVs or buses) or by their weight.

- **Controlled Parking Zones** ▪ CPZs can be designed and delivered in a way to restrict vehicle numbers and types during controlled hours with the intention of protecting the streets for residents with permits to control who has permission to park.
 - **Work Place Parking Levy** ▪ Charge businesses for their staff commuter parking bays.
 - **Congestion Charge Zone** ▪ reduce traffic numbers by charging vehicles if they enter the zone during certain times.
 - **Ultra-Low or Zero Emission Zone (ULEZ) (ZEZ)** ▪ Charge vehicles based on an emissions standard entering a zone. The London Mayor plans to tighten standards in the central London ULEZ to create a Zero Emissions Zone (ZEZ) by 2025. ▪ The ULEZ will be expanded to the North and South circulars in October 2021.
 - **London local road user charging zones** ▪ Creates a toll road where vehicles using the road can be charged based on class.
 - **Prioritising road space** ▪ make policy changes to support active travel such as walking and cycling and to ensure social distancing can be maintained.
- 1.6 Other London boroughs and some UK cities such as Birmingham, Glasgow and Nottingham have adopted the approach of charging vehicles based on the emissions they produce or reducing the times vehicles can enter a street. As a result, they have seen a change in behaviour by motorists and a shift in car ownership. For H&F this means that the transport control methods are tried and tested tools that works.
- 1.7 Emission-based charging has followed two basic strands:
- **Fuel type surcharging to parking charges**– to encourage greener fuel type usage from all vehicles that park in the borough.
 - **Emission based permits schemes** – based on DVLA emission data to encourage a shift in local car ownership to lower emission vehicles.
- 1.8 The Mayor of London’s Ultra Low Emissions Zone (ULEZ) will help push the change towards cleaner vehicles in London. ULEZ became fully operational in April 2019 and will expand to most of London by 2021 when it will incorporate H&F. The Mayor’s scheme will penalise non-ULEZ compliant vehicles entering London, which will include non-Euro 6 compliant diesels (typically built prior to 2015) and non-Euro 4 compliant petrol vehicles (typically built prior to 2005).
- 1.9 We are hopeful that with a combination of ULEZ and our own policies, we can make significant inroads into locally generated pollution and GHGs. However, we know that pollution spreads across both the congestion zone and council boundaries, and we wish to help protect the health of all of our residents by doing what we can to disincentivise polluting vehicles from coming to H&F in the first place.
- 1.10 The need to promote active travel, reduce the amount road space for traffic and reducing through traffic, will need to be done on an area wide basis through the creation of Low Traffic Neighbourhoods. These areas are made possible by

introducing traffic schemes that utilise the appropriate traffic control measures listed above to deliver the desired outcomes the scheme is trying to address (details of Low Traffic Neighbourhoods in Appendix 3).

Time and Classification based Controls

- 1.11 Nationally time-based controls have focused on reducing emission exposure the most vulnerable of residents, children. Healthier Streets sometimes known as School Streets are the preferred method as they reduce vehicle usage around schools, by closing a street during school drop off and pick up times, they proactively reducing emissions. This encourages active travel such as cycling and walking and most importantly reduces exposure to poor air quality inside the vehicle which is often 10 times worse than outside as the vehicles ventilation system sucks in air from the exhaust of the vehicles in front.
- 1.12 Glasgow is leading the way nationally with over 30 sites, in London, Hackney has developed the best practice guidelines on introducing a scheme and supports the independent School Streets Group.
- 1.13 School streets are an essential tool to ensure social distancing around schools can be maintained by increasing the space given to pedestrians and spreading the vehicles bringing children in to the surrounding areas.
- 1.14 Classification based controls nationally have targeted diesel powered commercial vehicles on residential roads. Lorry bans have been in place in London since the 1980s but have traditionally been difficult to enforce as it involved a police officer having to follow a vehicle through a zone.
- 1.15 Since the Traffic Management Act 2004 (TMA) councils in London have been given the power to enforce moving traffic offences (MTO). Improvements in technology, especially in cameras, has now meant that effective enforcement of lorry bans can now occur.
- 1.16 Low Traffic Neighbourhoods are area-based traffic control schemes that control vehicles that can enter residential streets, exempting certain vehicles, buses, taxis, permit holders and for access. They are very successful at reducing rat running traffic whilst enabling local traffic to function. Traditional methods such as a road closure, do not enable filtering of local traffic and apply the same rules to all, often to the inconvenience of residents.
- 1.17 Since Covid 19, new powers have been given to London Councils to use camera enforcement technology in cycle lanes. As part of the green recovery H&F will be implementing new cycle lanes which will need to be supported with intelligent cameras.
- 1.18 Lorry bans are designed to remove non-essential commercial traffic from residential areas, loading and unloading for deliveries can still take place. Previously width restrictions were used to control wider or heaviest of goods vehicles, but this has a detrimental effect on key services such as refuse collection. Camera technology has enabled open closures, which replaces a physical width restriction with a camera enforced gateway with a permitted vehicle list to allow essential vehicles through.
- 1.19 Camera technology has become intelligent and can now detect vehicle classification, vehicle speed, emissions both gaseous and noise, number plate

recognition and average speed through an area. They can work in a group to create a zone which can detect if a vehicle has stopped and unloaded, or simply driven through.

- 1.20 This opens the options for vehicle route management wider than ever before. A combination of vehicle classification and time-based controls can effectively enable virtual gated communities, ensuring areas are only used by local people and essential visitors, reducing the number of non-essential trips and usage of residential streets by through traffic.

Proposal options

- 1.21 Develop a programme of Low Traffic neighbourhoods to reduce traffic in residential areas and create a modal shift in transport usage.
- 1.22 Develop a programme, in conjunction with the schools, of healthier street initiative to reduce traffic and improve social distancing during school pick up and drop offs.

Controlled Parking Zones

- 1.23 The borough is comprehensively covered in controlled parking zones, and they have been focused on building a scheme to prioritise parking for local people and reduce commuter parking usually during the 9am-5pm times.
- 1.24 Since their introduction the use of the borough and the profile of commuter traffic has changed. There is a growth in more agile working, breaking the traditional 9-5 hours, expansion in the night time economy with later opening hours of shops and leisure locations.
- 1.25 The borough is home to 3 football stadia, with the introduction of new match times to fit in with TV scheduling, European and domestic cup matches, the range of hours and days that matches now take place are often outside hours of the existing CPZ controls. This encourages supporters to drive to matches instead of using other modes of transport.
- 1.26 The government has changed the criteria for Blue Badge entitlement to include some of the hidden disability strands. Blue Badge holders have additional privileges to allow them to park on yellow lines for 3 hours where there are no loading restrictions and can stay as long as they want to in parking bays.
- 1.27 It is expected that the number of Blue Badges in circulation will increase putting more pressure on residential parking. The parking layout may need to be adjusted to allow Blue Badge holders more double yellow line areas to park in key locations, longer control hours, or more dedicated bays for Blue Badge holding residents.

Proposal

- 1.28 It is recommended that the council continues to undertake the review of CPZs and take into consideration;
 - the hours and days of control,

- match day restrictions,
- hours of maximum stay for P&D,
- loading restrictions and bay distribution,
- reduce non-essential traffic demand, and
- facilitate the operations of local businesses.

1.29 The aim of reviews will only be to address any local parking issue but to deliver more strategic changes in support of the green agenda. For consistency, it should be considered as part of the review to normalise the times for CPZ operation boroughwide.

Work Place Parking Levy

1.30 National legislation has enabled councils to charge businesses parking charges for their commuter-based parking spaces. Nottingham City Council were the first to develop a scheme which has been used by TfL to shape the London wide best practice. In London, Camden and Hounslow have developed and consulted on WPL schemes, these have been largely been supported by local businesses many because the income generated was ploughed back in to providing alternative transport options such as tram links and new rail stations.

1.31 In the City of Nottingham “There are approximately 25,000 liable spaces in fewer than 500 liable workplaces (out of the total of nearly 3,000 workplaces in the city)”. In Hammersmith & Fulham, the top 50 employers employ over 50,000 people in the borough, 35.5% of the total workforce. It is likely that the WPL will only affect the parking provision for some of the largest employers.

1.32 The Mayor of London has requested the councils look at introducing a scheme as it is complimentary to London’s overall air quality and climate change strategy. TfL have set out basic requirements any WPL scheme should include and consider ensuring a consistent approach across London, TfL also provide funding opportunities for WPL projects.

1.33 A WPL typically takes around 3 years to implement to ensure the required consultation and legal processes can be carried out. The WPL charging scheme should be comparable to the on-street business permit charging to ensure there is no disparity. TfL have set a minimum of £750 per space per annum but are expecting inner London Boroughs to be much higher than outer London. Camden have set a charge of £1000 per space north of Euston Road and £1500 South of Euston Road as there is a natural boundary created by the road and the Congestion Charging Zone.

1.34 Essential and emergency fleets, Blue Badges and visitor bays are exempt from WPL charges, Electric vehicles can be discounted but TfL have advised that they should not be free.

Proposals

1.35 The council undertakes the initial steps to investigate the scope and benefits of implementing a WPL by commissioning a feasibility study.

Emissions-Based Controls

- 1.36 Many boroughs have already introduced emissions-based parking charges, either for permits or more recently (facilitated by technological advances) for non-resident visitor parking. This has helped realise a reduction in diesels and more polluting vehicles. In Westminster polluting vehicles were down 16% in trial zone, rolled out Borough wide it is estimated that 250,000 fewer diesel vehicles would park with a 50% diesel surcharge levy in place.
- 1.37 Vehicle emissions have a direct relationship to air quality and carbon reduction. Emissions-based charging conforms to the 'polluter pays' principle. There is a clear logic which is now commonplace in London for a higher premium to be charged for vehicles that have higher emissions. It is clear in this context the vital role that transport and parking policies can play in moving motorists towards more sustainable modes of transport and less polluting vehicles.
- 1.38 Emission based charging is a well proven method of ensuring vehicle ownership change. DVLA has noted a significant shift in vehicle ownership and fuels type since the introduction of emission-based schemes. The charts in figure 1 demonstrate the change when emissions base Vehicle Excise Duty was introduced.
- 1.39 To put into context the cost of parking, average value of a parking space in central London is valued at £4500 per annum (£15 per day excluding Sundays). By comparison public transport costs for a Zone 1-2 travel card is £7.20 and Zone 1-4 is £10.40 per day. In H&F charges are significantly lower than the cost of public transport, which makes car travel a viable transport method for commuting.

Emissions-based Parking Charges

Non-resident Short Term On-Street Parking Charges (Pay & Display)

- 1.40 Currently the pricing structure for visitors paying to park in the borough is the same regardless of the type of fuel used. Up to now, the Council has had no means of charging visitors more with diesel and more polluting vehicles to park in H&F.
- 1.41 Initial work on reconciliation of the P&D transactions indicate most transactions are by vehicles external to the borough. The low tariffs relative to other central London boroughs in conjunction with 8-hour maximum stay makes H&F an attractive destination to park and take alternative transport for the last mile into central London or to avoid the more expensive airport parking at Heathrow.
- 1.42 Retail areas rely on high turnover of P&D bays, shorter stays mean more potential customers to the local area. The main lever to encourage higher turnover is the tariff charged for the time stayed, this works twofold, firstly to control the length of stay and secondly to keep the occupation level of the bays at around 80% ensuring that vehicles have somewhere to park and not needless drive around looking for a space burning more fuel than is needed.
- 1.43 RingGo (Cobalt Technologies Ltd) who provide H&Fs mobile phone parking payment system can now be adapted to allow real time DVLA look-ups for each vehicle and depending on fuel type or emission band, can apply the relevant

charge directly – This check is done when a new vehicle is added to a user's account.

- 1.44 Most boroughs have policies that link short term parking tariffs to objective targets such as occupancy rate and vehicle types. This sets a clear mechanism to increase or decrease the charges based on who uses the bays ensuring the most efficient use of the space is achieved whilst delivering on the overall green objectives.

Proposal Options

- 1.45 It is recommended that a diesel surcharge be implemented that will be high enough to incentivise behaviour change to achieve the desired outcomes of this policy and should be applied irrespective of the vehicles Euro-emission standard.
- 1.46 **Table 1** illustrates the possible tariff structures based on vehicle emission, tariffs can be changed over time based on the effectiveness of the tariff to change the vehicle distribution, carbon level and air quality.
- 1.47 To give greater flexibility and control, it is recommended LBHF operate a range of tariffs that can be altered based on several key drivers, such as occupancy, compliance, vehicle fuel mix, proximity to local amenities.
- 1.48 To get the best operational efficiency it is recommended that the borough moves towards 100% cashless parking (currently 96%). It is recommended to follow the example of other boroughs and implement a program to remove the pay and display machines boroughwide based on usage, this is mainly down to the higher tariffs make cash payments impractical for drivers as it requires a large amount of coins.

Emissions-based Parking Permit Charges

- 1.49 The current permit charges in H&F have remained the same since 2012, having not been increased in line with inflation or Office of National Statistics price indexes. The Council has increased most fees and charges during this time and so the cost of the residents' and other permits relative to other services the Council for charges has gone down over this period, with there being no change in price for the permit in real terms.
- 1.50 It is now commonplace for London boroughs (and UK local authorities) to follow the lead by the DVLA and apply higher charges for more polluting vehicles (CO₂) and those that emit high levels of particulate matter (PM), and Nitrogen Oxides (NOx) supporting both borough and London-wide policies and strategies to address poor air quality (see **Table 2** for some London examples).
- 1.51 Promoting the use of greener vehicles through an emission-based permit scheme will help reduce ownership levels of more polluting vehicles in H&F. Permits for fully electric vehicles are currently free and this should be maintained for the current time. It is noted that boroughs that have had emissions-based parking in place for several years, now charge for these vehicles.

- 1.52 It is generally accepted that vehicle emission indicators for the purpose of issuing permits should refer to part V7 of the vehicle registration document (V5c) that provides details of the vehicle's CO₂ emissions in g/km, in accordance with the DVLA/Vehicle Certification Agency gradings.
- 1.53 It is noted that the application of the V7 to tariffs varies from Borough to borough. For example, Islington uses a very granular approach with a tariff per emission band enabling focused targeting of certain vehicle groups, whereas Camden groups the DVLA bands in to 5 simplified levels reducing the administrative overhead. Both methods do have an impact on vehicle ownership but there are pros and cons for both approaches.
- 1.54 Considered below is the introduction of a sliding scale of parking permits based on emissions standards. This would mean vehicles are categorised based on a range of emissions including CO₂, NO_x and particulate matter.
- 1.55 Also considered is a separate and additional, diesel surcharge to encourage consumers to consider the environmental impact of their vehicle choices and in recognition of the substantially higher amounts of NO_x and PM that diesel engines produce.
- 1.56 There should be consideration on changing the criteria for green permits so that it is only available to lowest emission bands and to the latest euro emission standards (currently Euro 6). If diesel surcharging is introduced, diesels should be no longer be eligible for Green Permits.
- 1.57 Residents' parking permits in H&F currently cost £119 for the first permit and £491 for the second per individual. **Table 2** shows current residents' permit charges with other comparable London Boroughs, which illustrates that it is now commonplace for Councils to support their air quality initiatives through incentivisation policies including emissions-based parking charges that include those for both petrol and diesel vehicles.
- 1.58 Currently, residents who own low emission vehicles (Euro 5 compliant, first registered from 1 Jan 2011 and emits levels of CO₂ below 100g/km) the Council offers a discounted permit at a rate of 50%. Furthermore, and demonstrating H&F's aspirations to become the greenest council in the UK, there is no charge for a residents' permit for a fully electric vehicle (this only applies to the first permit).
- 1.59 Based on data provided by RingGo for all current residents' permits in H&F, **Table 3** provides an estimated breakdown of the numbers and type of vehicles issued with permits.

Proposed Options

- 1.60 An example structure of how emissions-based charges might be applied in H&F is shown in **Table 4**.
- 1.61 It is recommended to follow the DVLA VED banding as greater granularity can be given to charges to identify and discourage the top polluters and encourage vehicle ownership to move to the lower bands. It is envisaged that a successful scheme will generate less income from parking charges than the current

charging regime. The overall benefits of the scheme to the environment outweigh any additional administrative cost of using this method.

- 1.62 **Table 5** shows the relative increase in charges by band for permits compared to DVLA VED. Matching the DVLA banding regimes gives the option of targeting the highest emitting vehicles. An example structure of how a diesel surcharge might be applied in H&F is shown in **Table 6**.
- 1.63 It is recommended that a diesel surcharge is charged in addition to the emissions-based charge, recognising that diesel engines generally produce much higher levels of nitrous oxides and harmful particulates than petrol engines, thereby contributing significantly to poor local air quality.
- 1.64 **Table 7** shows how these surcharges will translate in to total costs for the current different types of parking permits available in H&F. The table has assumed a diesel surcharge of 50%.
- 1.65 It is recommended to introduce emission-based charging using the DVLA banding for emission-based charging to allow better granularity in targeting higher polluting vehicles.

H&F Residents' Visitor Permits (RVP)

- 1.66 The Council operates a Visitor Permit System (RVP) for residents' visitors which offers discounted P&D parking charges. The scheme operates across all Controlled Parking Zones. There are currently no proposals to increase the cost of the RVP. The RVP can be used by carers visiting residents of the H&F.
- 1.67 As the RVP uses the same RingGo system as the Pay and Display parking it would be possible to introduce emission-based charges. It could be done in several ways, depending on the desired outcome. Charge the RVP based on the emission band of the resident's car, encouraging them to change their own vehicle and getting a double benefit from a cheaper resident permit, or introduce the tariff based on the visitor's car emissions. The latter has a higher administrative overhead and has no impact on getting the primary vehicle changed but may encourage residents to get their visitors to think about more environmentally friendly transport.
- 1.68 If the RVP is excluded from the emissions considerations there is an increased risk of fraudulent usage as it is possible to resell RVP sessions to non-visitors, and this is most likely to occur during match day events.

Proposals

- 1.69 It is recommended that RVP still remain discounted for visitors but is included in the Pay & Display scheme for emission based and diesel surcharging.

Reducing the impact of climate change on the environment and the ecology

- 1.70 Vehicle traffic will never be carbon neutral, nor pollutant free as vehicles are manufactured, often from mined raw materials and the production of the energy required to power them. Vehicles in operation shed particulates into the air from

brake dust and tyre wear. To combat this, environmental and ecological projects need to be done in parallel to help redress the balance.

- 1.71 Greening the grey helps replace concrete or paved expanses with planting that is carbon negative taking CO₂ out of the atmosphere and with the right plants helps to mop up the particulate matter. It also provides a wildlife haven and a potential corridor for them to move around the borough improving the biodiversity. Schemes in Holland has seen once single plant arable farmland return to wild biodiverse spaces over a period of 6-10 years showing that the damage to the local ecology can be reversed if we gave nature a helping hand.
- 1.72 It will take time for people to adjust to policy implications, but people are having to adjust from the impacts on the local environment such as the adverse weather conditions we are currently experiencing, and the likelihood is it will get worse before it gets better. Drought and flood events are more common place, the local ecology and the most vulnerable residents have the hardest time adjusting or coping with these extremes of the weather.
- 1.73 Flood protection, sustainable urban drainage and general public infrastructure improvements will be needed to help reduce the damage caused by the weather.

Proposal

- 1.74 To utilise existing and new funding streams to deliver environmental and ecological protection and development schemes determined by the Climate and Ecological Emergency Board.

2. Reasons for Decision

- 2.1. As the majority of greenhouse gasses and air pollutants produced in the borough are through traffic related activity, implementing the proposals set out in this report will significantly help to deliver the councils Climate Change and Air Quality objectives by reducing traffic, changing the vehicle types using the borough and introducing public realm schemes that reduce the impact of climate change on the residents and the local ecology.
- 2.2. It is envisaged that there is a potential to fund climate change related or carbon offsetting projects from any additional revenue generated as vehicles transition to greener models or any non-compliance.
- 2.3. The methods have been tried and tested in pockets across the UK some of them for over 10 years. Those Councils have seen significant reduction in high emitting vehicles and it this trend is expected to be seen in H&F as well. The policy and measures outlined in this document supports the Mayor of London's strategy and the policies the government has introduced through the DVLA, which helps to increase the effectiveness in achieving the outcomes.
- 2.4. The policy allows all the measures to be adjusted differentially, not only to alter the rate of change, but to allow targeting of specific vehicles, fuel types and driving patterns. This ensures that change happens at a pace the residents and businesses can feel comfortable with adopting. Consultation

with residents and businesses is an essential part of the successful delivery of measures.

3. Equality Implications

- 3.1. There are no significant negative equality implications for any groups with protected characteristics, under the terms of the Equality Act 2010, by the approval of these policies and initiatives.
- 3.2. A separate EIA has been carried out and the likely impacts of the measures will be neutral when analysed in totality. Officers have assessed that the overriding benefit of improving the air quality and reducing the impacts of climate change for all equalities strands will be greater than any localised negative affect that may occur as a result of utilising the traffic control measures.
- 3.3. Implications verified by: Fawad Bhatti, Policy & Strategy Officer, Public Services Reform, tel. 07500 103617.

4. Risk Management Implications

- 4.1. *Management of emissions will contribute positively to the environment and health of the local area. The Council has embraced the challenge and continues to deliver environmental initiatives in the local area that include but are not limited to;*
 - *Parcels not pollution delivery zero emission delivery service*
 - *H&F Report it from Smartphones*
 - *Hammersmith & Fulham's electric vehicle charging points to transform the borough and drive down harmful emissions.*
- 4.2. *Implications verified by: Michael Sloniowski, Risk Manager, telephone 020 8753 2587*

5. Consultation

- 5.1. It is recommended that consultation forms part of each element as it is introduced. Statutory consultation is required to change to the Traffic Regulation Orders required for implementing and Parking or Traffic controls.
- 5.2. Some of the policy changes will mainly affect visitors or non-residential based vehicles. It is recommended to get the maximum reach to the affected people is via online consultation.
- 5.3. Where policy changes affect local residents directly it is recommended that boroughwide consultation takes place well in advance of any proposed implementation so that residents have reasonable time to consider and adapt to the proposals.

List of Appendices:

Appendix 1 – Tables and Figures

Appendix 2 – Background information

Appendix 3 - Gold and SLT Report COVID Response Transport Strategy

Appendix 1 – Tables and Figures

Figure 1: Change in vehicle ownership - DVLA

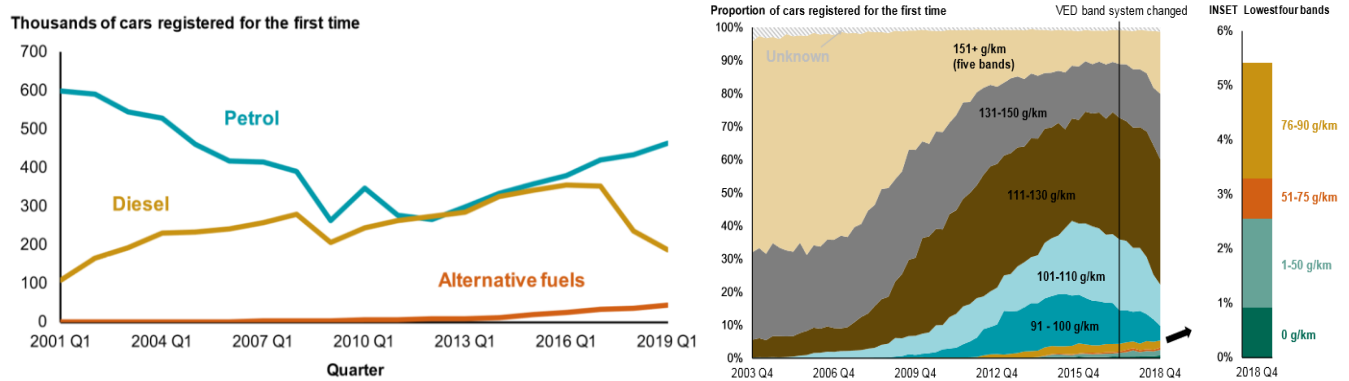


Table 1: Suggested Emissions-based Charges for On-street Parking

Emission Group	A-E <101kg/km	F-H 100<>151kg /km	I-K 150<>226kg /km	L-M >225kg/km	Surcharge for diesel vehicles	Estimated shift in vehicle ownership
Estimated emission band breakdown [#]	12%	12%	38%	38%	52% of all vehicles ⁺	
Current hourly parking charge [*]	£2.50 / £3.20	£2.50 / £3.20	£2.50 / £3.20	£2.50 / £3.20	£0	
Tariff Option 1						
Proposed hourly parking charge	£2.50 / £3.20	£2.50 / £3.20	£3.75/£4.80	£5.00 / £6.40	50%	5-10%
Increase per hour	No Change	No Change	£1.25/£1.60	£2.50/£3.20		
Tariff Option 2						
Proposed hourly parking charge	£2.50 / £3.20	£3.00/3.80	£4.50 / £5.70	£5.50 / £7.00	50%	8-15%
Increase per hour	No change	50p/60p	£2.00/£2.50	£3.00/£3.80		
Tariff Option 3						
Proposed hourly parking charge	£2.50 / £3.20	£3.75/£4.80	£5.00 / £6.40	£7.50/£9.60	50%	10-20%
Increase per hour	No change	£1.25/£1.60	£2.50/£3.20	£5.00/£6.40		
Tariff Option 4						
Proposed hourly parking charge	£3.00/3.80	£4.50 / £5.70	£5.50 / £7.00	£7.80/£10.0 0	50%	15%-30%
Increase per hour	50p/60p	£2.00/£2.50	£3.00/£3.80	25%		

Current P&D on-street parking charge (2019)

[#] based on DVLA national data of vehicle registrations

⁺ based on RingGo user data.

	Tariff Charges			Travelcard		
Rate/Type	£2.50	£3.20	£4.50	Z1-2	Z1-4	Z1-6 extension
Daily equivalent	£20.00	£25.60	£36.00	£7.20	£10.40	£28.00

charge						
--------	--	--	--	--	--	--

Table 2: of Comparison Residents' Parking Permits with Other London Boroughs

London Borough	Residents' permit cost
Hammersmith & Fulham	£0 - £119 First permit £119, second permit £491 per year (individual only not household). 50% discount for low emission, and 100% discount for full EV.
Camden	£59.12 - £296.14 depending on CO ₂ emissions. Additional surcharge for diesel vehicles between £12.71 and £63.67 (second permit surcharge based on household) – grouped DVLA bands into 5
Islington	£17.50 - £457 Petrol (<u>Depending on CO₂ Emission DVLA band</u>). £113.50 - £553 Diesel (<u>Depending on emissions</u>) (Second permit surcharge per household)
RBKC	£80-£219 depending on vehicles CO ₂ emissions. Additional £41 on diesel vehicles if they do not meet the Euro 6 emissions standard (<i>currently under review for increase</i>) – <i>Linked to exactly DVLA bands</i>
Lambeth	Between £35 and £299 depending on vehicles CO ₂ emissions. Additional £40 for diesel vehicles
Southwark	£31.25 – £125per year. (£31.25 for PHEV and full EV)
Wandsworth	First permit £166, second permit £201 per year
Tower Hamlets	£6 - £157 depending on CO ₂ emissions
Hackney	£10 - £264 depending on CO ₂ emissions

Table 3: Approximate Number of (First) Residents' Permit by Vehicle Type

Type	Approximate Number	Proportion
Diesel	11,000	37%
Petrol	17,000	58%
Electric	120	0.5%
PHEV	1,100	4.0%
Other	200	0.5%

First permits are issued on an individual basis not per household. i.e. if a household has four cars and four eligible drivers, residents can register the vehicles individually and all receive permits at the first permit price.

Table 4: Emissions-based parking permit structure and corresponding surcharge level options

DVLA VED Band	CO2 Emissions (g/Km)	DVLA Duty	Option 1			Option 2		
			H&F Emissions Band (EB)	Permit Price	Emissions Surcharge	H&F Emissions Band (EB)	Permit Price	Emission Surcharge
A	0	£ -	A (EV)	£ -	0%	EB0 (EV)	£ -	0%
B	1-50	£ 10	B	£ 60	0%	EB1 (up to 100g/km)	£ 119	0%
C	51-75	£ 25	C	£ 125	5%			
D	76-90	£ 110	D	£ 131	10%			
E	91-100	£ 130	E	£ 137	15%			
F	101-110	£ 150	F	£ 215	80%	EB2 (between 101 and 150 g/km)	£ 238	100%
G	110-130	£ 170	G	£ 238	100%			
H	131-150	£ 210	H	£ 262	120%			
I	151-170	£ 530	I	£ 286	140%	EB3 (between 151 and 225 g/km)	£ 334	180%
J	171-190	£ 855	J	£ 334	180%			
K	191-225	£ 1,280	K	£ 357	200%			
L	226-255	£ 1,815	L	£ 381	220%	EB4 226+	£ 417	250%
M	256+	£ 2,135	M	£ 417	250%			

Typical popular vehicles and their bands

A-E (around 80% of permits)

Audi A1 to A7
 BMW 1,3,5,7 series
 Mercedes A, C, E class
 Ford Ka, Fiesta, Mondeo, Torneo, S-Max
 Nissan Qashqai, leaf, Juke
 VW Golf

L-M

Alfa 159S, Spyder
 Aston Martin Vanquish, DB
 Audi S line series, A8, R8, Allroad
 BMW M series
 Ford Mustang, Transit
 Honda NSX, S2000
 Mercedes AMG models
 Land Rover Discovery, Freelander

Table 5: Comparison of DVLA Vehicle Excise Duty Increase by Band to Proposed Permit Charge

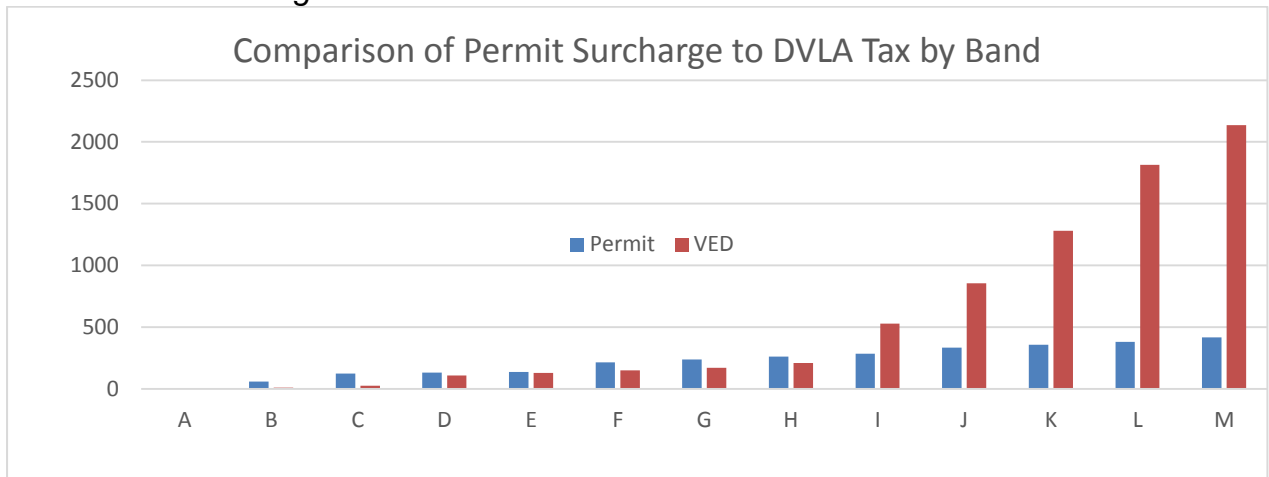


Table 6: Additional Diesel Surcharge Options

H&F Emissions Band (EB)	Diesel Surcharge Options %age increase			
	Option 1	Option 2	Option 3	Option 4
EB1 to EB4	10%	25%	50%	100%

Table 7: Example of the Cost of Annual Parking Permits Using an Emissions-based Structure
Using Option 2 of the Emissions Bands and Option EB3 of the Diesel Surcharge.

Permit Type *	Current Annual Permit Cost (£)	Total Cost of Annual Permit by H&F Emissions Band (£)				Total Cost of Annual Permit by H&F Emissions Band and Option 3 (50%) Diesel Surcharge (£)			
		EB1	EB2	EB3	EB4	EB1+ DS	EB2+ DS	EB3+ DS	EB4+ DS
Full EV	0	0							
Green permit	60	60							
1 st resident	119	119	238	234	417	179	357	351	626
2 nd resident	497	497	994	1392	1740	746	1491	2088	2610
1 st business	791	791	1582	2215	2769	1187	2373	3323	4154
2 nd business	1,310	1310	2620	3668	4585	1965	3930	5502	6878
Doctors	122	122	244	342	427	183	366	513	641

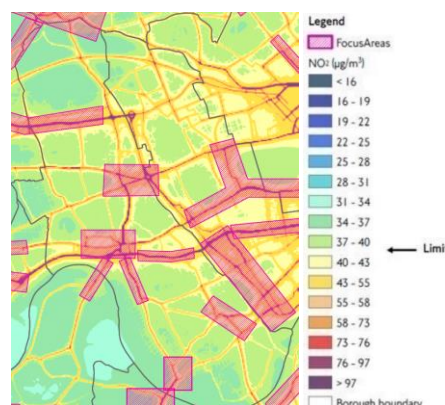
Where available the six-month permits will be pro rata the annual permits plus admin fee.

Appendix 2 – Background Information

Air Quality in H&F

- 1.1 Poor air quality in London is believed to result in around 9,000 premature deaths every year. Kings College London, the Institute for Public Policy Research (IPPR) and Greenpeace have all stated that diesel engines emit 40% of the capital's Nitrogen Dioxide (NO₂) and particulate matter (PM10) emissions. The World Health Organisation also has NO₂ on its list of “definite carcinogens”.
- 1.2 Diesel engine exhaust includes soot, aerosols such as ash particulates, metallic abrasion particles, sulphates, silicates and nitrogen oxides. The black carbon element of diesel emissions has a particularly adverse effect on human health. Diesel exhaust also contains nanoparticles, which have additional health impacts, though not yet fully understood. The adverse health effects of diesel particulates are linked to cancer, heart and lung damage, and mental functioning. Exposure has also been linked with acute short-term symptoms such as headache, nausea, coughing, difficult or laboured breathing, irritation of the eyes, nose and throat and the onset of asthma in vulnerable individuals.
- 1.3 Diesel fuelled vehicles can emit up to four times more nitrogen oxides and up to more than twenty times more particulate matter than petrol fuelled vehicles. This has significant adverse health impacts and including for drivers who are particularly exposed to air pollution whilst in their vehicles.
- 1.4 It is worth highlighting that whilst EV reduces local GHG emissions, they still have a negative impact on local air quality producing PM2.5 from brake dust and tyre wear. Consideration should be given to whether EV parking is provided for free or whether it should also contribute to offsetting its impacts on the environment.
- 1.5 A whole-borough Air Quality Management Area (AQMA) has been declared for H&F since 2001 because of failing to meet the EU annual average limits or exceeding World Health Organisation air quality guidelines for Nitrogen Dioxide (NO₂) and Particulate Matter (PM10). In addition, six air quality Focus Areas - locations identified by the GLA as having high levels of pollution and human exposure – have been identified in H&F identified in Figure 1.
- 1.6 Pollution in Hammersmith & Fulham comes from a variety of sources with the main sources of Nitrogen Oxides (NO_x), including Nitrogen Dioxide (NO₂) comes from road transport. One of the main sources of particulate matter is road transport such as diesel vehicles.

Figure 1 - Air Quality Focus Areas in H&F



Pay & Display Machines – On-Street Parking Considerations

- 1.7 The number of motorists opting to pay for parking in H&F using Pay & Display (P&D) ticket machines (PDM) has significantly reduced in recent years and current data shows that around 96% of payments are made through RingGo. The remaining 4% that use PDM are almost entirely made using credit/debit cards with less than 1% using cash.
- 1.8 PDMs are currently being targeted by criminal gangs London wide with overfitting of devices to clone codes and record the pin pad activity. Parking service get notified of around 3 – 4 instances per week, which could be the tip of the iceberg as there is no data on the actual exposure to users from the scam.
- 1.9 H&F PDMs do not have the technology to differentiate by vehicle type - those that are electric, petrol, or diesel - as there is no DVLA look-up facility. Therefore, it is important to acknowledge that motorists wanting to pay for parking by card or cash using a PDM will be required to pay the highest rate of emissions charge. They can opt to pay the discounted parking charge through the RingGo system, if appropriate for their vehicle. This position is likely to encourage more customers to pay for parking using phone payment technology. With over 90% of visitors paying to park using a mobile phone App this will affect very few motorists.
- 1.10 Civil Enforcement Officers will use existing systems to determine if correct payment has been made through the RingGo system. No special enforcement equipment is required and no change in enforcement procedures are necessary to enforce emissions-based parking charges
- 1.11 Cashless parking would provide the council with more options to control vehicle behaviour, and it is expected that a change to emissions-based charging with a diesel surcharge will natural move users over to cashless parking as it would provide them with the best price.

Powered Two Wheelers

- 1.12 PTW such as motorcycles have parked for free in London as it has not been possible to securely fix a permit or P&D ticket to the vehicle. Additionally, because of their size they occupy limited kerb space compared to a car. With the introduction of e-parking, using the VRM as the permit, it is now possible to include PTW in any emission-based scheme.
- 1.13 Whilst PTW have less of an impact on congestion, they do still contribute emissions that impact climate change and air quality. It would be possible to apply a blanket percentage discount to PTW to reflect the relative impact they have compared to a car and a separate report considering PTW parking has been submitted to the Cabinet Member for the Environment.
- 1.14 E-parking and cashless parking is an essential part of including PTWs in a charging regime.

2. Other Considerations

Administrative and management cost implications

- 2.1 There are administration and operational cost implications for the Council to consider if emissions-based and diesel surcharges are introduced. Details of these are not quantifiable at present but will include one-off set-up costs for introducing new software capabilities, build costs within Conduent and RingGo, and additional checks by officers before issuing permits.
- 2.2 The introduction of e-permits and residents access initiatives would reduce the administrative burden by enabling more online real-time validation and paperless permits, which improves the service to residents, enables easier enforcement and reduces the carbon footprint of the existing paper-based system.
- 2.3 Legislation gives scope for the councils parking account to recover administrative costs through charging, and any surplus is ringfenced to be spent only on transport and highway initiatives, including measures that influences the traffic impacts on the environment.
- 2.4 It is therefore envisaged that any new schemes will be able to adequately pay for themselves when looked at collectively.

Impact on Low Income Families

- 2.5 It is recognised that the cost of owning a vehicle does have a proportional relationship with the emissions output of the vehicle as it is generally linked to engine size, vehicle size and fuel type and that in general the ownership of vehicles in low income families is lower.
- 2.6 Lower income families are not only more likely to suffer from the effects of NOx and particulate emissions as it can compound other health issues associated with low incomes such things as poorer living standards and nutrition, but also suffer as the cost of living increases such as climate change affecting the global price of food.
- 2.7 In equality terms we must acknowledge that some low-income residents may be disproportionately financially disadvantaged by these changes to charging and members may wish to consider mitigations. However, the positives of improving the environment has the greatest benefit to low-income residents and any mitigation needs to be looked at in the round.

Introduction of charges and the impact on residents

- 2.8 For Pay and display charges, additional statutory consultation is required to change the traffic orders that implement the short-term parking tariffs.
- 2.9 Emission based charging has been around since 2008, it is now widely accepted as a successful measure to change vehicle ownership and behaviour and a very powerful tool in a borough armoury in tackling environmental issues as supported by data from the DVLA, however it does take time from informing residents of changes for them to be able to react to those changes in a reasonable timeframe.

- 2.10 Gauging the residents view on both the concept of emissions charging and what levels of tariff they believe would make a difference may be prudent and could enable a more aggressive tariff model than described above to ensure the climate change objectives are met. It is noted that those boroughs that engaged with residents heavily had the least resistance to implementation and less post implementation complaints. The resident climate change commission may offer a sensible local view on the style and approach to implementation.