

## SUMMARY OF RESPONSE TO CONSULTATION ON DRAFT KEY DECISION REPORT

1. A draft of the Key Decision Report “Review of resident parking permit structure” was circulated to Residents Associations and all ward councillors for comment between 28 September and 10 November 2020 before the final decision report was proposed. It was also uploaded to the consultation part of the Council’s website and advertised via e-newsletters sent to residents who subscribe to them.
2. A total of 91 responses were received to the consultation. 14 residents’ associations and 77 individual residents responded to the consultation. The residents’ association that responded were:
  - Campden Hill Residents’ Association;
  - Cheyne Walk Trust;
  - Clarendon Cross Residents’ Association;
  - Earl’s Court Society;
  - Egerton Gardens Mews Residents’ Association;
  - Elm Park Gardens Residents’ Association;
  - Holland Park Residents’ Association;
  - Kempsford Gardens Residents’ Association;
  - Ladbroke Association;
  - Lots Road Chelsea Committee;
  - Oakwood Court Residents’ Association;
  - Peabody Tenants’ Association;
  - Pembridge Association;
  - World’s End Residents’ Association.
3. There was a mixture of views including several residents and residents’ associations who supported the proposals. As no specific question was asked on whether the residents were in favour or against the proposals, and many responses were nuanced, a tally has not been made of those who were in favour or against. The full comments from those who responded can be found in Appendix B. A summary of the comments received and officers’ responses to them can be found below.

### **Officer response to comments made**

4. The most popular comment related to the timing of implementation of the proposals which 29 respondents felt should be later than 1 April 2021 for a variety of reasons: residents are currently suffering financial hardship and will not be able to pay more for their permits; COVID means that residents need to have a car now more than they would in normal times; there are not enough affordable electric vehicles on the market and very few on the second hand market; there needs to be more electric vehicle charging points; residents are concerned about range anxiety associated with electric vehicles currently on the market; the Council should wait until the ULEZ reaches RBKC before implementing any changes and residents will need more time to change their vehicles.

Officer response: The cap set for the CO2 emissions for the first year will mean that no resident will be asked to pay an increase in their permit cost of more than £88;
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the majority of residents will face an increase of less than £25, with over 6,000 residents paying less than they currently do.

Whilst the new charges will come in on 1 April, residents will have until the renewal date of their permit to change their vehicle, so some will not be affected by the increase until as late as March 2022.

The primary objective of the ULEZ is to reduce NoX and particulate emissions, whereas the changes to our parking permit structure is focussed on reducing CO2 emissions.

5. Several respondents noted that electric vehicles were expensive and so poorer residents would be adversely affected by this policy and that the policy would only benefit a few residents financially.

Officer response: To achieve a saving on the cost of a residents' permit, residents do not need to switch to an electric vehicle but just to a vehicle with lower CO2 emissions. This can be achieved by moving from a large car to a smaller car of the same age, or a slightly newer model of an equivalent car.

6. Several respondents believed that the policy would not achieve its objectives for a variety of reasons: the policy was too blunt; CO2 emissions are driven by bigger worldwide issues and transport CO2 emissions is a small part of this; the current permit price is already based on emissions so it was not much of a change; the policy seemed to be a reduction for cleaner vehicles rather than an increase for dirtier vehicles; transport is not the biggest contributor to borough's poor air quality; the cost of a parking permit will not influence the decision to buy an electric vehicle and the policy would do nothing to reduce particulates from tyres and brakes. Respondents also commented that vehicles driving through the borough caused more air pollution than residents and that there were better ways to improve air quality, e.g. reducing congestion and encouraging the use of public transport. Some respondents also noted that encouraging electric vehicles ignores the environmental damage caused in the making of electric vehicles and generating the electricity used to power them.

Officer response: It is true that many factors affect air quality, but the Council cannot control all of them. The revised permit structure seeks to encourage change in one area over which the Council has some influence, namely residents' choice of vehicles. The Council already charges for residents parking permits based on CO2 emissions – the revised permit structure aims to apply the same principle in a different way to provide a stronger incentive for residents to move to cleaner vehicles.

The Council is also actively trying to reduce congestion and encourage more use of public transport.

7. Some respondents felt that the Council was using parking permits to raise revenue, and a few felt that the new charges should be higher so the borough could use the

income to support its other work. One respondent noted that the RBKC parking permit was cheap compared to parking permits issued by other local authorities.

Officer response: The Council would never propose changes to the resident permit structure to raise revenue and is only making changes to the resident parking permit structure to achieve the policy objective of reducing CO2 emissions in the borough.

8. Some respondents also noted that previous governments had encouraged the take up of diesel vehicles and now residents are being penalised for having a diesel vehicle. One respondent noted that the ULEZ will essentially remove all non-Euro 6 diesels with residents' parking permits.

Officer response: The proposal in the draft Key Decision Report increased the existing diesel surcharge from £47 to £60. It is true that in the early part of the century, diesel vehicles were presented as a more carbon-efficient fuel than petrol. The Council has applied a surcharge for diesel vehicle permits since 2008, and most residents will have replaced their cars at least once since then. However, we cannot ignore the evidence that diesel vehicles have harmful effects to health, which have been well-publicised in the media for some years. It is acknowledged that the ULEZ will probably remove most non-Euro 6 diesels from the borough, but this is not in itself a strong argument against the £13 increase in the diesel surcharge. We wish to encourage that our permit pricing structure continues to encourage residents with pre-Euro 6 diesels to switch to cleaner vehicles.

9. A few respondents noted that older vehicles are not necessarily bad for the environment, especially when the environmental impact of building a new car is considered, that the policy would penalise older people who were more likely to have older vehicles with higher emissions and that the ULEZ was already penalising old cars. A couple of respondents were concerned that the policy would adversely affect Blue Badge holders.

Officer response: Officers examined resident parking permit data to establish whether, as was claimed, older residents are more likely to have older cars than younger residents. This is because, as a rule, newer vehicles will attract a lower permit fee than equivalent older vehicles, as a result of having lower CO2 emissions. Officers found that even the average CO2 emissions of vehicles belonging to residents aged over 65 were lower than for residents aged under 65, However, the expected average increase in cost is slightly higher for the over 65s than for the under 65s. It is believed that this is because residents who are older than 65 are less likely to have a vehicle in Band 1 and therefore less likely to gain the saving in permit price which vehicles in Band 1, particularly those that are zero emissions, are likely to obtain. The existing residents' parking permit charging structure is based on CO2 emissions with vehicles with higher emissions paying more. The policy aims to encourage residents to move to cleaner vehicles which will be either smaller versions of vehicles of the same age or newer vehicles.

Blue Badge holders will not be adversely affected by this policy as this policy relates to resident parking permits and not Blue Badges. Blue Badge holders who are

resident in the borough are likely to have a Purple Badge which will continue to be free and so would be unaffected by this proposal.

A full Equality Impact Assessment is attached as Appendix C.

10. Several respondents suggested that the parking permit charge be based on usage rather than emissions, as a vehicle with large emissions infrequently used is better for the environment than a vehicle with smaller emissions used all of the time and a parked car generates no emissions.

Officer response: We agree that a parked car generates no emissions but as soon as it moves it does (unless it has zero tailpipe emissions) and residents are unlikely to purchase a residents' parking permit unless they had some intention of driving their car. Whilst a combination of emissions and usage would theoretically be a better basis for charging than manufacturer's emissions alone, we are unable to do this as there is no mechanism for the Council independently to check the mileage of a vehicle.

11. Some respondents suggested basing the price of a permit on the size or weight of the car to discourage SUVs and increasing the subsequent permit charge or limiting the number of cars per household. One residents' association suggested more vehicle parking spaces should be introduced, such as by the provision of echelon and perpendicular parking.

Officer response: The review of the parking permit pricing structure was primarily to encourage a shift to cleaner cars rather than reducing the total parking permits issued or increase the amount of parking space available to residents.

Information on vehicle length is not provided on the vehicle registration certificate (V5C) so we will not be able to charge based on the vehicle's length.

If we can obtain weight information from the DVLA database, we may be able to charge on this basis at some point in the future, but we will be unable to do this by 1 April 2020 due to the amount of development work required to the resident permit system.

If we limited the number of vehicles per household to two, around 600 residents would no longer be eligible for a permit and the number of residents' parking permits issued would fall by less than 2 per cent. Whilst the Council is prepared to discourage multiple car ownership in a household, it considers that the policy benefits of removing the ability to hold more than two permits in a household would be outweighed by the disbenefit to the household concerned. We have also considered the suggestion that there should a higher price for the third permit and fourth etc. – this would add a level of complexity to the fee structure which is not warranted for the number of permits affected.

Officers maximise parking where they can. If there are any specific areas where residents believe more parking could be introduced, then they should contact the Council and ask officers to investigate.

12. Other suggestions of how the permit pricing could be changed included:

- Increasing the base cost of the permit to allow for pollution caused by electric vehicles such as brake dust and to ensure that the pricing of parking a car on-street was more than the cost of parking a bike in a cycle hanger (currently £72 a year);
- Expensive cars and new cars should pay more;
- The charge should be more for Band 6 and Band 7 vehicles;
- The diesel surcharge should be higher;

Officer response: The cost of parking a cycle in a cycle hanger is set by a third-party private company and not the Council. The cost of cycle hangars is not met by the Council nor do they generate any income for the Council. A cycle hanger provides dedicated parking for bicycles whereas a parking permit provides the ability to park in a residents' parking bay but does not guarantee a space to park.

It would be difficult to base a pricing structure on the value of a car and it would not align with any policy objectives. Whilst it would be possible to base the permit price on the age of a vehicle, it would not be desirable as we would not want to encourage residents to keep older, more polluting, vehicles.

Vehicles in Band 6 and 7 would naturally pay more as their CO2 emissions are higher than other bands.

The change in the permit fee structure is already increasing the cost of the permit for many residents so we do not wish to increase the diesel surcharge to more than originally proposed. However, the diesel surcharge will be increased at a rate above the general rate of inflation from 2022/23 onwards to encourage residents who have still retained their pre-Euro 6 diesel vehicles following the introduction of ULEZ to choose petrol or electric vehicles which have less harmful health impacts.

- The permit costs for electric vehicles should cover the costs for providing electric vehicle charging infrastructure;
- Parking for all electric vehicles should be free (for both residents and visitors), including second cars and resident electric vehicle owners should be refunded for permits already purchased.

Officer response: The Council is not proposing to increase the cost of electric vehicle residents' permits to cover the costs for providing electric vehicle charging infrastructure as we do not wish to put financial barriers in the way of residents moving to electric vehicles, especially as electric vehicles currently have a price premium.

There is a cost to the Council of issuing the permit. It would be unfair to ask non-electric vehicle owners to subsidise electric vehicle owners by making the permit free for them.

- Residents with existing cars with high CO2 emissions should pay less than residents who change their vehicle to one with high CO2 emissions;
- Exceptions should be made for people who cannot afford the higher charges;
- In a few years only issue permits to cleaner cars; and

Officer response: It is technically difficult to have a different charging regime for existing customers compared to new customers due to the limitations of the resident permit system.

It would be labour-intensive to introduce means testing to the issue of residents parking permits. We do not do this for other services.

There might be some valid reasons why some residents have what is deemed to be a non-clean car. It would be a significant impact on their lives if we were to deny them the opportunity to own a car if they already have one.

13. Suggestions on other general parking or transport related issues included:

- Reduce the amount of space available for car parking by dedicating more road space to cycle parking, car clubs and minicabs;
- Installing more cycle racks on the pavement;
- Requests for no idling campaign or higher charges for idling offences;

Officer response: As vehicle ownership in the borough is falling year on year, we are able to, and do, dedicate more road space to other uses such as cycle parking.

We aim to install cycle racks on pavements whenever we get a request to do so and there is space available to accommodate the cycle rack.

The Council has run several anti-idling campaigns and will continue to do so. The Council cannot dictate the charge payable for Fixed Penalty Notices for idling engines as this is set by the government.

- Splitting the one resident parking zone into smaller zones, as is common across London to reduce short intra-borough journeys ;
- The Council should provide visitor parking permits;
- Do not allow key workers to park in residents' bays as there is not enough space;
- Motorcycles should not be allowed to park in residents' bays;

Officer response: The single residents' parking zone is very popular amongst residents as it helps them to visit friends and relatives by car in other parts of the

borough. The Council has no intention of splitting the one residents' parking zone into smaller zones.

As the Council has one residents parking zone, unlike other boroughs, a visitor permit would be valid anywhere in the borough. Some areas of the borough have very high parking stress in residents' bays and could not accommodate any more vehicles.

When the current pandemic is over, the parking concessions offered to key workers will be withdrawn.

We have made the cost of the permit to park a motorcycle in motorcycle bays free to encourage motorcyclists to use these bays rather than park in car parking bays. However, we do not wish to force motorcyclists out of car parking bays. If we banned motorcyclists from parking in car bays there would need to be a motorcycle bay on every street which would most likely remain only partially used therefore not making the best use of the kerbside space available.

- Visitor parking for electric vehicles should be free;
- Bays in front of lamp column electric vehicle charging points should be reserved for electric vehicles;

Officer response: Our visitor parking charges have a 25 per cent discount for electric vehicles but we do not wish to make it free for electric vehicles to park because electric vehicles still contribute to congestion and wear and tear on the road surface.

The Source London charging bays are reserved for electric vehicles, but we do not wish to reserve the lamp column chargers for electric vehicles as on many streets there is only one electric vehicle user and it would essentially be dedicating a bay for their sole use. Source London electric vehicle chargers are 7KW/h whereas the lamp column chargers are 3Kw/h and the Source London pricing policy encourages vehicle owners to vacate the bay as soon as their vehicle is fully charged, thus enabling turnover of the space. When the number of electric vehicles owned by residents increase, we will revisit this policy.

- The Council should insist that all delivery vehicles are electric;
- People who break the speed limit should be fined a proportion of their salary;
- The Council's website for parking permits needs to be fixed;

Officer response: The Council has no control over what type of vehicles delivery companies use nor can it set the fine for breaching speed limits which is set by central government.

The Council has made improvements to the online process to change the vehicle registration on residents' parking permits.

14. Other comments included:

- Air quality is much better now than it was a few years ago;
- Not all residents will have seen the consultation;

- Motorcycles are more polluting than cars;
- What proportion of vehicle engine pollution can be attributed to residents' vehicles?
- Policy would lead to an increase in the number of minicab operations in the borough using electric vehicles.

Officer response: Whilst air quality has improved in some respects in recent years, it is still not as good as it should be, and continues to breach targets set by government, so more progress needed to be made.

The draft key decision report was both long and necessarily quite complicated. Previous complicated consultations which the Council has carried out have yielded a very low response rate. It would not have been a good use of Council money to post the consultation to every resident in the borough and it would have consumed a lot of paper. This would have been disproportionate to the likely impact of the proposed changes, given that all residents are already familiar with the principle of linking permit prices to environmental performance. Officers, therefore, emailed all residents' associations so that residents could obtain an electronic copy of the report. We also promoted the consultation via e-newsletters and on the consultation part of the Council's website.

As motorcycles do not have their CO2 emissions shown on the vehicle registration document, they cannot be included in the new pricing structure based on CO2 emissions and permits for them must be charged for separately.

We do not know the proportion of vehicle engine pollution which can be attributed to residents' vehicles.

Officers consider it unlikely the lower price of a residents' parking permit would change the business case for minicab operations in the borough.

15. Two questions about the policy were asked:

- How will the policy apply to hybrids?
- Will other zero emission vehicles, e.g. hydrogen fuelled vehicles, have the same charge as electric vehicles?

Officer response: Hybrids will be charged on the CO2 emissions shown on their vehicle registration certificate (V5C). Other zero emission vehicles will be treated in the same way as electric vehicles.

### **Changes to the Key Decision Report following consultation**

16. As a result of this consultation, the following changes were made to the draft report before it was proposed:

- Added clarification on hybrid vehicles and other zero emission vehicles to the text of the report; and



- Amended a typographical error which suggested that motorcycles had zero emissions.

17. The rate of inflation was also updated from an assumed 1.9 per cent to 1.1 per cent (which was the Retail Price Index rate of inflation in September 2020).

Ends