

The London Borough of Newham Community & Environment

Delegated Approval Introduction of Emissions-Based Parking Permit Charges following Statutory Consultation August 2020

1. Background

Parking policies and procedures have the ability to influence the number, type and the amount of usage of vehicles in an area and can be an important tool in delivering behavioural change and improvements to air quality (and consequently environmental and public health improvement). Local authorities have powers to control and regulate parking.

In terms of the wider policy framework all London Councils must operate in accordance with:

- the statutory duties with respect to air quality set out in Part IV of the Environment Act 1995:
- the requirements of the London Local Air Quality Management statutory process set by the GLA (Greater London Authority);
- The (London) Mayor's Transport Strategy 2018;
- The (London) Mayor's (draft) New London Plan;
- The national 'Road to Zero' Strategy which aims for 50%-70% of new car sales to be ultra-low emissions vehicles by 2030;
- The Clean Air Strategy 2019;
- The Newham Air Quality Action Plan.

Newham residents are exposed to high levels of toxic pollution caused by vehicles causing the highest rate of deaths in England - that's 96 people dying prematurely each year. Newham also has the highest number of children admitted to hospital due to asthma-related conditions.

The Air Quality Action Plan has been produced as part of our legal duty to London's Local Air Quality Management strategy. It outlines the actions we will take to improve air quality in Newham up to 2024.

Particulate Matter are particles that can be ingested deep into the lungs. Most particulate matter emissions in London are caused by road traffic. The whole of Newham is significantly exceeding the World Health Organisation's air quality guideline objective. This pollutant has significantly adverse health impacts, particularly for the most vulnerable in our society. As well as contributing to the achievement of our air quality duty, the revised parking policies and scale of charges must also meet the London Mayor's Transport Policy outcomes as well as our local policy and wider corporate aspirations.

The Cabinet approval in February 2020 agreed to the draft revised parking policies for the second phase of informal public consultation which was carried out in March 2020. A total of 4,832 responses to the online questionnaire were received by the council of which 4,281 raised concerns (mostly relating to costs) regarding the introduction of emissions-based permit parking charges to help improve air quality in Newham, However it should be noted that this only represents approximately 1.5% of the Newham population, and less than 8% of the

vehicles registered within the borough meaning that the vast majority of residents or existing permit holders did not raise any concerns or objections.

Historically, few motorists ever support the introduction of, or an increase in, parking charges irrespective of the wider health benefits associated with the proposal or their *general* support for environmental and health interventions. The lack of support is therefore more likely to be a reaction to the potential of paying for a permit that is currently free, regardless of the fact the vehicle may be higher polluting and it is not therefore considered to be a rejection of the concept of, or need for introducing an emissions-based charging system.

Consequently, Delegated Authority in consultation with the Corporate Director and Cabinet Member was obtained in June 2020 to proceed to a statutory consultation on the proposed emissions-based permit charges (along with other permit changes), and this ran from 8th to 29th July 2020.

In total, only 199 responses were received from the statutory consultation, of which 166 were objections, 19 were supportive, 7 provided additional comments only (but did not object), 7 felt more information was required and 1 objection was in relation to the proposed 2 hour free parking allocation. More details on the responses received are at Section 4 and Appendix A.

The objection responses received mimic, to some extent, those from the previous round of consultation, in that there was the expected adverse reaction to the introduction of charges when none currently apply, but without any alternative suggestions to address our air quality crisis being offered. However, it is noted that the quantum of responses received is much lower than that in the previous consultation round, suggesting that there is a growing acceptance of the need for the measures and the outcomes they will deliver.

This report therefore seeks Delegated Approval to over-rule the objections received and progress with the making of the supporting traffic order for the introduction of emissions-based parking permit charges for both residential and business parking permits. The report also seeks Delegated Approval to defer the introduction of the new charging regime until January 2021, so as to allow for a period of economic recovery and for residents to have adequate advance notice of the new charges coming into effect. This delay will also allow for the systems testing of the Council's parking software which will manage the new permit system.

2. Recommendations

That the Assistant Director for Highways and Sustainable Transport, in close consultation and agreement with the Corporate Director for Environment and Sustainable Transport, and the Cabinet Member for Environment, Highways and Sustainable Transport, is recommended to:

- 1. Note and consider the objections and comments received and approve the officer responses as detailed in Appendix A;
- 2. Over-rule the objections as outlined in section 4 and in detail at Appendix A;
- Approve the making of the relevant Traffic Management Order in October 2020 under the relevant Sections of the Road Traffic Regulation Act 1984, as amended, in order to implement emissions-based parking charges and other permit changes as previously approved;
- 4. Approve the Statement of Reasons for the above;
- 5. Approve the deferral of the date on which the relevant TMO above comes into force until 6th January 2021.

3. Details

The key new change to the council's Parking Policy and Procedures is the introduction of resident and business permit charges based on the CO₂ emissions category used by HMRC for vehicle taxation purposes.

Vehicles are grouped into charging tiers according to HMRC grouping as shown in the tables below:

HMRC Band	CO2 emissions (g/km)	Engine Size (c.c.) (Pre- 2001)	Newham Emission Tier	Example Car Models		
A	0	1-600	Tier 1	All battery electric vehicles eg Nissan Leaf, Tesl: models, BMW I models, VW e-Golf, and some		
В	1 - 50	601-900	nei 1	hybrids eg Passat Hybrid, Mercedes C/E 330e models, Toyota Prius Plug in		
С	51 - 75	901-1000				
D	76 - 90	1101- 1200	Tier 2	Most hybrid models, eg Toyota Prius, Yaris & Auris, Range Rover PHEV and most small petrol and diesel vehicles, eg Ford Fiesta, Focus (newer		
E	91 - 100	1201- 1300	Her 2	models), Vauxhall Corsa, Astra, Kia Ceed, Peugot 308, Renault Megane, Clio, BMW 1 series etc.		
F	101 - 110	1301- 1399				
G	111 - 130	1400- 1500		Audi A2,3,4 & 5, BMW 2, 3 4 series (smaller		
н	131 - 150	1501- 1650	Tier 3	engines), Ford Focus 2.0, Mondeo, Mercedes A C, E class (newer 180d, 200d and 220d models) VW Golf, Jetta, Hyundai i30, Kona, Seat Leon,		
ı	151 - 170	1651- 1850		Ibiza, Citroen C3, C4, Berlingo, etc		
J	171 - 190	1851- 2100	Tier 4	BMW 2,3,4 series, X2,X3,X4,X5, VW Touareg, Tiguain, Audi Q7, Q8, Porsche 911, Cayenne,		
К	191 - 225	2101- 2500	Her 4	Land Rover Range Rover & Discovery (sport models). Mercedes E350, GLC		
L	226 - 255	2501- 2750	Tion F	Jaguar FType V6, Jeep Wrangler 2.8, Mitsubishi Shogun 3.2, Mercedes AMG 63 models, Bentley		
М	Over 255	2751 and above	Tier 5	models, Rolls Royce models, Ferrari models, Maserati models		

Residential Permit Emissions-Based Tiers

HMRC Band	CO2 emissions (g/km)	Engine Size (c.c.) (Pre- 2001)	
Α	0	1-600	
В	1 - 50	601-900	Tier 1
С	51 - 75	901-1000	
D	76 - 90	1101- 1200	
Е	91 - 100	1201- 1300	
F	101 - 110	1301- 1399	
G	111 - 130	1400- 1500	Tier 2
н	131 - 150	1501- 1650	
ı	151 - 170	1651- 1850	
J	171 - 190	1851- 2100	Tion 2
К	191 - 225	2101- 2500	Tier 3
L	226 - 255	2501- 2750	Tion 4
М	M Over 255		Tier 4

Business Permit Emissions-Based Tiers

Following the earlier consultation phases set out in Section 1, and the Cabinet approval obtained in February 2020, a Delegated Authority report recommending to progress with a statutory consultation on the emissions-based permit charges was prepared and approved in June 2020. This outcome of this consultation is discussed below in Section 4.

4. Consultation to date

- First phase consultation completed in March 2019 (Assembly events and on-line engagement via POL.iS platform);
- Cabinet Member engagement was undertaken prior to Cabinet approval in February 2020:
- Second stage consultation completed in March 2020 (on-line questionnaire);
- The Cabinet Member for Environment, Highways and Sustainable Transport has been fully engaged throughout the entire parking policies and procedures review process;
- Statutory Consultation (July 2020)

The statutory consultation for the introduction of emissions-based parking permit charges was carried out between 8th and 29th July 2020.

The council received 199 responses and these are summarised in the table below:

Emissions Based Consultation Objection Type Summary								
First Permit Charge	First Permit Charge & Generic info email	Other Objection including cost	Objection to permit issue process	Objection to 2 hour free parking allocation	In Support	More info	No Objection made - Comments only	Total Responses
41	61	63	1	1	19	7	7	200
Total - Objections								
		167						

Out of 199 responses received all of the objections included concerns about costs associated with the implementation of emissions-based permit charges.

- 41 of the responses objected solely to the fact there is likely to be a charge for the first resident permit per household;
- 61 objected to the fact there is likely to be a charge for the first resident permit per household but raised other concerns relating to air quality and timescales for implementation;
- 63 responses were objecting to introduction of emissions-based permit charges and a high number were also raising concerns about the costs associated with these charges during the current economic crisis with job losses and Covid-19;
- 1 objection was raised in relation to the 2 hour free parking allocation, and
- 19 responses were in full support of the proposals.

The remaining 14 responses did not object to the proposals but either required more information or made comments in relation to other parking matters which are not relevant to this report and will be addressed separately.

Generally, those 41 objectors that simply objected to a charge being levied could have been expected, and there was no acknowledgement of any need to address air quality by other means in their responses, and they were purely financial in nature. Given the modest charges to be introduced, and that the majority of Newham residents do not own private cars, these objections can be over-ruled.

Of the 61 objecting to the charges but also to the relevance to air quality and timescales, these respondents tended to dismiss air quality as a valid argument for the introduction of revised charges. This is quite a concern, as the Borough has particularly poor air quality and public health as a result, and this is clearly not well understood – or simply is denied for convenience. Either way, our air quality issues are irrefutable and objections that dismissed the relevance of charges to air quality can be over-ruled. In this group a number also expressed concerns about timing of the measures, which we believe have been addressed by the deferral of the measures until 2021. Therefore, these concerns have been addressed and these too can be over-ruled.

65 responses cited the Covid 19 crisis as a reason not to progress – due to economic impacts, job losses etc. While we acknowledge that Newham residents have taken a financial impact from Covid, it is very clear from Public Health England data that we have taken a heavy impact on health, with one of the highest mortality rates in London – which is directly related to the respiratory health of our residents, which in turn is as a result of our air quality. We must prioritise the health of our residents and also improve our resilience to any further outbreak, so in our view Covid has made emission based charges even more of an imperative. For this reason, these objections can also be over-ruled.

Therefore, following close consideration of the objections received, and the requirement to achieve corporate objectives of improved air quality, health and wellbeing, it is recommended the objections be over-ruled and the Traffic Management Order supporting the introduction of emissions-based parking permit charges progressed with immediate effect.

Details of the objections raised in relation to the implementation of emissions-based permit charges are provided along with the detailed officers responses to each are both contained in Appendix A. (For brevity, responses have been grouped by objection type, so not all 166 responses have been provided with an individual response.

The Statement of Reasons for the making of the order is attached at Appendix B

5. Forward Programme

No further approvals beyond this Delegated Authority are required to implement the emission based parking charges as set out in the report to Cabinet in February 2019.

While the traffic order can effectively now be made, the date when it will come into force will be deferred until 6th January 2021, to allow for a period of economic recovery.

Announcement of this decision and the date of introduction of the new charges will be a political decision and require appropriate timing.

6. Financial Implications

The financial implications of emissions-based charging on parking revenues is set out in full in the February Cabinet paper. However, to summarise, the Council's Parking service currently generates income of around £24m per annum, of which £5m relates to income from the issue of around 190,000 parking permits for residents, businesses, visitors, staff and carers. Approximately 57,000 of these are residents' permits and 2,500 business permits. Expenditure incurred in the operation of the service is around £10m per annum, leaving a surplus of approximately £14m per annum, which supports the maintenance of roads, the provision of school crossing patrols, community transport and assisted travel schemes, such as the Taxicard scheme and Freedom Pass. (Newham's contribution to London Councils for the London-wide Freedom Pass costs exceed £10m every year.)

The Road Traffic Regulation Act 1984 states that local authorities can only spend surplus parking income on traffic and transport measures. However, the Greater London Authority Act 1999 amended this legislation. It enables London local authorities to use any surplus parking income to implement the Mayor of London's Transport Strategy. The Transport Strategy states that parking surpluses can be used to fund:

- Bus priority measures and other measures to improve bus services
- Structural maintenance of bridges and roads
- Healthy Streets areas identified in the Local Implementation Plan
- Environmental street improvement schemes
- Interchange projects
- Measures to assist freight developed through Freight Quality Partnerships
- Complementing congestion charging
- Development of school travel plans and workplace travel plans

• Vehicle emissions monitoring and enforcement.

The proposal to introduce emissions-based permit charges for residents and businesses could generate an additional £4.5m in year one on current levels, based on charges according to emissions tiers, as set out in the tables in section 3, with residents' vehicles with emissions of 50g/km or less receiving no charge for a permit (75g/km or less for business permits). The estimated income is based on vehicle type data from DVLA and permit data. However as the vehicle fleet is influenced by the charges it is expected to reduce steadily through years two and three.

The introduction of the new permit charges in January 2020, with an ongoing extension of current permits which expire in the intervening period between April 2020 and that date, will ensure full permit income is achieved in 2020/21 under the new charging regime.

Environmental and financial outcomes will be monitored annually, and the charging regime will be reviewed accordingly.

7. Legal Implications

The Traffic Management Act 2004 and the Statutory Guidance that accompanies it requires local authorities to regularly review their policies and procedures to ensure they remain fit for purpose. The Environment Act 1995 and other national, London-based and local policies require the council to improve air quality for all its residents. The new parking policies and procedures include measures designed to affect vehicle use and encourage a shift to less polluting forms of transport.

The council has the power to introduce such measures under the Road Traffic Regulation Act 1984, as amended, and the procedure for doing so is set out in the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996.

The traffic order required to revise parking permits and charges will be processed under sections 45, 46, 49 and 124 of the Road Traffic Regulation Act 1984.

The procedure regulations requires the council to notify the objectors within two weeks of the making of the order.

8. Approvals

Report Originator	Murray Woodburn	Signed:	Dated:
		Murray Woodburn	11.08.2020
Principal Officer, Parking Design	Diane Bourne	Signed:	Dated: 11.08.2020
Principal Officer, Traffic Orders	Neil Barker	Signed:	Dated: 11.08.2020

I approve the above recommendation:

Assistant Director (Highways and Sustainable Transport)	Mario Lecordier	Signed:	Dated:
		June 1	12.10.20
Corporate Director, Environment and Sustainable Transport	Jamie Blake	Signed:	Dated: 12.10.2020

I confirm I have been fully consulted upon and approve the above recommendations:

Cabinet Member for Environment,	Councillor	Signed:	Dated:
Highways and Sustainable Transport	James Asser	Kliped.	13.10.20

Details of Objections Received and Officer Responses:

Appendix A Officer Responses to Objections Raised:

The statutory consultation for emissions-based parking permit charges was carried out between 8th and 29th July 2020 and has resulted in 200 responses of which 167 were objections and these are detailed in this report.

The council received:

- 61 duplicate responses in relation to the first permit charge, emissions and parking revenue and are detailed along with the officer response in A.1 below;
- 42 responses from members of the public objecting to the introduction of the first permit charge and the officer response is detailed in A.2 below;
- 2 responses were received objecting to the first permit charge and raising concerns for Blue Badge Holders, elderly and people with young families and the officer response is detailed in A3 below;
- 3 responses were received from members of the public objecting to the length of 2 Hours "all day" free parking allocation and the officer response is detailed in A4 below;
- 23 responses were received from members of the public objecting primarily to the cost of the
 permit charge when Covid-19 is affecting many residents and the officer response is detailed
 in A5 below;
- 25 responses were received from members of the public objecting the cost to residents if the introduction of emissions-based parking permit charges is implemented and the officer response is detailed in A6 below;
- 9 responses were received from members of the public objecting to the proposals in some other way and an officer response is detailed below in A7;
- 1 response was received in relation to the operational process for permit issue; and
- A number of other responses were received from members of the public where no details of were provided as to the reason the objection was made and an officer response to these is detailed below in A8.

A.1 Objections Relating to Charges, Taxation, Revenue Generation:

- 1. I would like to object to implementation of the charge for parking a vehicle near to my home. This is something that the Council promised not to implement when they consulted and implemented the CPZ in the borough. Many residents including myself are reliant on a vehicle for many reasons (supporting disabled family members, work) Vehicles are substantial purchases that come with additional costs (insurance, mot, maintenance), upgrading to more economical vehicle at such notice puts me and family under considerable financial strain, when we are already very pressured and stressed. Unfortunately the previous consultation on parking has been flawed. Consultation has been via information within the Newham Council website. This has resulted in most residents being unaware of the consultation, which seriously reduces their ability to respond to it. This I believe warrants both consultations as unfair.
- 2. 89% of respondents objected to the charge when consulted in March 2020. This demonstrates that there was no appetite for this then and I believe that there is still none. I certainly do not want to see this charge implemented. As the Mayor wants 'a beacon of participatory democracy', the people's voice should be heard and taken on board.
- 3. TFL will extend its ULEZ scheme in 2021 which will tax heavier polluting vehicles. Surely LBN should wait and see the effects of this policy before double taxing its residents.

- 4. There is a high volume of residents who use their vehicle for work purposes and for these residents a charge will no influence their car usage behaviour as they feel they have no option. This will have no significant change on air quality.
- 5. When Newham Council implement the restrictions on parking, they promised residents that the first vehicle would be free. Therefore, this would be a breach of this promise.
- 6. To suggest that non-car owners shouldn't subsidise car owners is short sighted. We live in an economy dominated by the transport of goods and services by road vehicles. Just because you may not own a vehicle does not mean that you aren't contributing to air pollution everyday by simply existing and buying goods and services.
- 7. The Council generates a substantial amount of revenue from parking contraventions etc. The cost of administering the scheme is minimal in comparison, and therefore the argument to charge for cars (including breaking a promise and charging for the first car) does not stand. Therefore, this does not justify charging cars.
- 8. The issue of air pollution is massive and it can't be ignored. I think a tax on cars dependant on emissions, is only fair under the following circumstances:
- (a) Residents should be given the time and the opportunity to transition to using more economical vehicles. Implementing such a scheme with such notice places immense pressure on residents. Many of us do not have the resources, time or the money to make such a substantial change at such short notice.
- (b)Allowing residents the time to transition, provides the Council the opportunity and time to prepare for this transition. (E.g. implementing charging points, implementing renewable energy creation in the majority of buildings) At the current moment the borough is not in a position to support the majority of residents switching to electric cars.
- 9. If LBN really wants to cut emissions, force the parking inspectors to use pedal cycles rather internal combustion motorcycles.
- 10. The suggested relaxation of the current type of towing policy is fully supported.

I agree that there are probably many vehicle trips made in Newham that could be made by cleaner methods. However I believe the vast majority of journeys are made by people trying to make a living and feed their family. To make the proposed changes soon is grossly unfair. However I would support this policy if the conditions I make in point 8 are met. I encourage you all to reject this proposal.

Officers Response: The Road Traffic Regulation Act 1984 (RTRA) as amended places a duty on the council to secure the expeditious, convenient, and safe movement of vehicular and other traffic (including pedestrians), to provide suitable and adequate parking facilities on and off the highway and to provide an attractive street environment for everyone and the implementation of residential parking zones borough wide has proven to be an effective way to achieve this.

Newham residents are however exposed to high levels of toxic pollution caused by vehicles resulting in the highest rate of deaths in England which equates to ninety six people dying prematurely each year. Newham also has the highest number of children admitted to hospital due to asthma-related conditions.

In response to the above concerns which not only affects residents living in the borough of Newham but is both a London and global issue and in advance of the proposed extension to ULEZ which is central to the Mayor's plans to improve the health of Londoners by cleaning up the city's toxic air, which leads to the early deaths of thousands of Londoners every year; an Air Quality Action Plan has been produced as part of the council's legal duty to London's Local Air Quality Management strategy. It outlines the actions we will take to improve air quality in Newham up to 2024 and aims to incentivise motorists to make more environmentally friendly choices which in turn will improve air quality.

In line with the strategy and as part of the Mayor of London's Go Ultra Low City Scheme the council has already installed some electric car chargers in the borough and will be installing a further 40 double electric car chargers on nominated residential roads during 2020/21. In addition to this the council is applying for further funding to expand the network of electric chargers throughout the borough.

The council has also invested in a network of air quality monitors for NOx and Particulate Matter (PM10) and third party monitoring for locations such as London City Airport for which constant monitoring will remain a priority.

Within Residential Parking Zones (RPZs) residents can apply for a permit which entitles them to park within permit holder bays at any time during the controlled hours of their zone without time limit. Whilst granting a permit allows the use of a space in an RPZ, there is no entitlement to or guarantee of a specific space within the zone. However, by discouraging certain groups of non-residents from parking in an area, an RPZ increases the likelihood that a resident can park close to their home and helps to encourage, via the use of emissions-based charges, consideration for vehicle usage and type change.

In 2012 it was agreed the first resident permit per household would remain free of charge but with growing concerns surrounding climate change and air quality there is a need to incentivise motorists to make improvements to air quality. The council's residential parking zones had been implemented at a time when emissions-based permit charging was in its infancy. Subsequently many London boroughs have introduced some form of emission-based permit charging and are finding this to be an effective tool in reducing vehicle emissions by influencing behavioural change and to help improve air quality. The proposed introduction of emission-based parking permit charges is therefore similar to those already operating in many London boroughs.

The council has undertaken two distinct public engagement phases; the first in the spring of 2019 and the second in March 2020. The initial phase consultation results showed two-thirds of residents wanted measures adopted to improve air quality and reduce car use however the second consultation did not indicate such a clear majority for the implementation of an increase in emission-based parking permit charges.

An analysis and evaluation of the positive and negative impacts from the new charges concluded that the reasons for introducing emission-based parking charges outweigh the reasons for not implementing them.

The council has considered the concerns that may arise from the proposed introduction of emissions-based parking permit charges when the economy is suffering due to the outbreak of Covid-19 and it is for this reason the implementation of these proposals would not be introduced until January 2021, which would enable residents / businesses additional time to make alternative travel arrangements.

It is therefore recommended the objections be over-ruled and the introduction of emissions based parking permit charges be progressed.

A.2 Objection to Charge for First Permit:

The council received responses from members of the public whose only objection was to the introduction of a charge for the first resident parking permit.

Officers Response: The Road Traffic Regulation Act 1984 (RTRA) as amended places a duty on the council to secure the expeditious, convenient, and safe movement of vehicular and other traffic (including pedestrians), to provide suitable and adequate parking facilities on and off the highway and to provide an attractive street environment for everyone and the implementation of residential parking zones borough wide has proven to be an effective way to achieve this.

Newham residents are however exposed to high levels of toxic pollution caused by vehicles resulting in the highest rate of deaths in England which equates to ninety six people dying prematurely each

year. Newham also has the highest number of children admitted to hospital due to asthma-related conditions.

In response to the above concerns which not only affects residents living in the borough of Newham but is both a London and global issue and in advance of the proposed extension to ULEZ which is central to the Mayor's plans to improve the health of Londoners by cleaning up the city's toxic air, which leads to the early deaths of thousands of Londoners every year; an Air Quality Action Plan has been produced as part of the council's legal duty to London's Local Air Quality Management strategy. It outlines the actions we will take to improve air quality in Newham up to 2024 and aims to incentivise motorists to make more environmentally friendly choices which in turn will improve air quality.

In line with the strategy it is proposed that new banded charges for resident and business parking permits will be introduced based on a vehicle's CO2 emissions. Resident permits for those with the least polluting vehicles will remain free, while those with more polluting vehicles will pay progressively more.

It is therefore recommended the objections be over-ruled and the introduction of emissions based parking permit charges be progressed.

A.3 Objection to First Permit and Blue Badge Holder Concerns:

I strongly object to the proposed changes to the resident parking charges for 1st cars. As a disabled driver myself. I object on the grounds that there are other Blue-Badge holders in the Borough and elderly couples and lots of families. We have all suffered during lockdown in one form or another financially and personally.

Officers Response: The Road Traffic Regulation Act 1984 (RTRA) as amended places a duty on the council to secure the expeditious, convenient, and safe movement of vehicular and other traffic (including pedestrians), to provide suitable and adequate parking facilities on and off the highway and to provide an attractive street environment for everyone and the implementation of residential parking zones borough wide has proven to be an effective way to achieve this.

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In line with the strategy it is proposed that new banded charges for resident and business parking permits will be introduced based on a vehicle's CO2 emissions. Resident permits for those with the least polluting vehicles will remain free, while those with more polluting vehicles will pay progressively more.

The council has considered the concerns that may arise from the proposed introduction of emissions-based parking permit charges when the economy is suffering due to the outbreak of Covid-19 and it is for this reason the implementation of these proposals would not be introduced until January 2021, which would enable residents / businesses additional time to make alternative travel arrangements.

A.4 2 Objections to Hours "all day" free parking allocation:

It is pleasing to see that Newham is trying to do more to improve the air quality within the borough. Whilst this is welcomed it is a shame that little thought has been given to prompt residents shopping more in local high streets; using local businesses and services. The current mini zones do very little to encourage local residents to shop locally rather than going to large supermarkets or shopping centres due to having to pay to park outside of their mini zones. The proposal of giving each household 2 hours a month parking allocation outside of their zone simply does not go far enough. This is not practical, extremely limiting and poorly thought through. For example if an individual has to park to attend an appointment i.e. to see their GP then their entire months allocation is gone on attending a single appointment. What about being able to do other things in the borough i.e. do weekly shop. Other boroughs such as Tower Hamlets which is more inner London do more to support residential parking across their borough so why can't Newham?

As a resident I have always found the mini zones to be very restricting and also feel that they do not bring the community together within the borough. I urge for you to reconsider and redraft point (v) on the draft proposal on the allocation of parking time outside of the mini zones per household.

Officers Response: Newham currently has 31 Residential Parking Zones (RPZs) and 5 Industrial Parking Zones (IPZs) covering the entire borough. These were introduced over a number of years to tackle some of the issues below.

- Increasing car ownership, resulting in pressure on residential roads particularly by commuters.
- Key venues, which were placing great demands on the network, including West Ham United Football Club and the ExCel Centre.
- High levels of parking stress near shops and restaurants, education sites, places of worship, schools, hospitals or rail, tube or DLR stations and businesses located away from residential areas and
- Pressure from developments including Westfield and the Queen Elizabeth Olympic Park and new residential developments

RPZs are considered nationally to be an effective way to manage the local roads in order to address issues such as traffic/parking congestion, access, safety and car borne pollution, however it is understood requirements change over time and as such the council endeavours to undertake reviews to amend zone times and boundaries where concerns have been raised.

Newham offers short-term, on-street parking which ranges from a maximum stay of 30 minutes to 4 hours, usually in the form of either paid-for parking bays in certain RPZs or free bays. These bays have been implemented for people visiting shops, religious establishments and businesses and the proposed introduction of the 'all day' permit is therefore intended to be in addition to the above parking arrangements.

Newham residents are however exposed to high levels of toxic pollution caused by vehicles resulting in the highest rate of deaths in England which equates to ninety six people dying prematurely each year. Newham also has the highest number of children admitted to hospital due to asthma-related conditions. The council must therefore look at the needs of all of the residents and businesses within the borough to support the Mayor's Transport Strategy for improvements to air quality and encourage modal shift from journeys by car to public transport.

It is for the above reasons the proposal for the 2 hours "all day" free parking allocation will not be amended at this stage but will be considered again in line with government requirements to regularly review the councils' parking policies. It is therefore recommended the objections be overruled and the introduction of emissions based parking permit charges be progressed.

A.5 Introduction of emissions-based parking permit charges during Covid-19:

R Ahmed - I believe it the proposal to increase parking charges and parking permit cost is unnecessary as Transport for London is already implementing ULEZ to make London cleaner, this will affect Newham residents.

Newham Council increasing charges for what is an alleged attempt to get rid of old polluting vehicles is a clear attempt to increase revenue in one of London's poorest boroughs who has been hit the hardest in this pandemic.

This proposal is poorly timed when lots of Newham residents have lost jobs and need the support of the council at this time.

Officers response: The Road Traffic Regulation Act 1984 (RTRA) as amended places a duty on the council to secure the expeditious, convenient, and safe movement of vehicular and other traffic (including pedestrians), to provide suitable and adequate parking facilities on and off the highway and to provide an attractive street environment for everyone and the implementation of residential parking zones borough wide has proven to be an effective way to achieve this.

Newham residents are however exposed to high levels of toxic pollution caused by vehicles resulting in the highest rate of deaths in England which equates to ninety six people dying prematurely each year. Newham also has the highest number of children admitted to hospital due to asthma-related conditions.

In response to the above concerns which not only affects residents living in the borough of Newham but is both a London and global issue and in advance of the proposed extension to ULEZ which is central to the Mayor's plans to improve the health of Londoners by cleaning up the city's toxic air, which leads to the early deaths of thousands of Londoners every year; an Air Quality Action Plan has been produced as part of the council's legal duty to London's Local Air Quality Management strategy. It outlines the actions we will take to improve air quality in Newham up to 2024 and aims to incentivise motorists to make more environmentally friendly choices which in turn will improve air quality.

In line with the strategy it is proposed that new banded charges for resident and business parking permits will be introduced based on a vehicle's CO2 emissions. Resident permits for those with the least polluting vehicles will remain free, while those with more polluting vehicles will pay progressively more.

The council has considered the concerns that may arise from the proposed introduction of emissions-based parking permit charges when the economy is suffering due to the outbreak of Covid-19 and has agreed to defer the introduction of the new charging regime until January 2020, so as to allow for a period of economic recovery and for residents to have adequate advance notice of the new charges coming into effect.

It is therefore recommended the objections be over-ruled and the introduction of emissions based parking permit charges be progressed.

Samiha Begum, Thanjima Hussain, Teodora Paduret, Nadia Hague and Shuhel Uddin Kahleda Kahnom Fateha Khanom . All state - I highly object to the proposed emissions based vehicle charging bands because simply put - most of us in Newham cannot afford it. This is tone deaf to the needs of the constituents as one of the most impoverished boroughs in London.

With all the job losses that will be inevitable in the coming weeks and months, I believe that Newham residents should not be put under further financial strain. Our economy is tanking and this is an additional financial burden.

Please put yourselves in our shoes and do the right thing. If anything, the current parking charges I feel are exorbitant and above inflation and agnostic of the economic situation we have right now.

Newham residents are exposed to high levels of toxic pollution caused by vehicles resulting in the highest rate of deaths in England which equates to ninety six people dying prematurely each year. Newham also has the highest number of children admitted to hospital due to asthma-related conditions.

The National Clean Air Strategy 2019 devolves responsibility for further reducing emissions mainly to a local level. The national targets, such as the aim of 50-70% of new car sales being Ultra Low Emissions Vehicles (ULEV) by 2030, require local authorities to develop the enabling support infrastructure.

The London Mayor's regional proposal to extend the ULEZ from central London out to the North and South Circular Roads in October 2021 will also require local actions on the part of those Boroughs that will be affected.

The council has considered the concerns that may arise from the proposed introduction of emissions-based parking permit charges when the economy is suffering due to the outbreak of Covid-19 and has agreed to defer the introduction of the new charging regime until January 2020, so as to allow for a period of economic recovery and for residents to have adequate advance notice of the new charges coming into effect.

It is therefore recommended the objections be over-ruled and the introduction of emissions based parking permit charges be progressed.

Linda Blanchard - I object to the proposal to levy a charge for all except electric vehicles. The problem as I see it is that there are very few electric charging points around the Borough. Indeed, the only one I know of in Stratford where I live is outside a public house in Tramway Avenue, where it seems to be monopolised by one car owner. I feel that until drivers can have greater access to charging points, it is unfair to penalise them for not having electric cars. I would buy an electric car tomorrow if I could have regular access to a charging point. Like many Newham residents, I live in a street of terraced houses which would make the installation of suitable charging points impossible.

Whilst I admit to owning a car with a petrol engine, I would like to point out that I clock up very few miles within the Borough. Most of my journeys around Newham are on public transport (which is woefully inadequate). A few times a year I use my vehicle to travel to Milton Keynes to visit the graves of my parents, as there is no other way I could make this journey. When I shop in the Borough, I use my trusty "trolley" to transport my supplies. I object therefore to paying to house my car in Newham because my car journeys do not contribute a great deal to the air pollution in the Borough.

I feel a better way to tackle air pollution in Newham would be to work with TfL to improve the public transport system around the Borough. Until there is a reliable, adequate, bus service in Newham, residents will continue to use their cars, especially at times such as these when bus capacity is restricted because of the Covid-19 Emergency.

It is my view that this charge is being introduced primarily as a much-needed source of revenue in a cash-strapped borough such as ours, rather than the stated aim of reducing air pollution.

I ask that you take into account the above objections I have raised to the proposed parking scheme. I am assuming that no final decisions have been made regarding the proposals and that if enough objections are received there will be a further consultation to canvass the views of Newham residents.

Vicky Cook - I object to the introduction of charging Newham Residents for cars that give off emissions. This is a personal attack on those that are already vulnerable and low income families. Since COVID-19, there are even more families struggling with day to day finances and this is just another nail in the coffin for those of us who rely on our cars. It is abhorrent that you think it is ok to charge when there are already charges for this in central London. People also rely on getting the first permit for free and

not everyone can afford to change their car (I don't know anyone who has £15k stashed to buy a new car). This should not go ahead.

Officer Response: Newham residents are exposed to high levels of toxic pollution caused by vehicles resulting in the highest rate of deaths in England which equates to ninety six people dying prematurely each year. Newham also has the highest number of children admitted to hospital due to asthma-related conditions.

In line with the strategy it is proposed that new banded charges for resident and business parking permits will be introduced based on a vehicle's CO2 emissions. Resident permits for those with the least polluting vehicles will remain free, while those with more polluting vehicles will pay progressively more.

The council has considered the concerns that may arise from the proposed introduction of emissions-based parking permit charges when the economy is suffering due to the outbreak of Covid-19 and has agreed to defer the introduction of the new charging regime until January 2020, so as to allow for a period of economic recovery and for residents to have adequate advance notice of the new charges coming into effect.

It is therefore recommended the objections be over-ruled and the introduction of emissions based parking permit charges be progressed.

M Fabikun - I am read the proposed changes and I highly object to them strongly, during this time of coronavirus and a possible recession, its beyond belief that a labour borough is still pushing policies that are punishing drivers. These new policies will punish homes with more than one car, without considering that people are struggling as it is. Who will pay for the charges when there is a greater concern about getting to work safely and paying for food? There is concern for the environment but yet there should be a common sense approach to this and its timing. These kinds of policies would see typical labour voters like myself seriously consider voting for another party due to these hard hearted policies during the time of a national crisis and pandemic.

Officer Response: The council has considered the concerns that may arise from the proposed introduction of emissions-based parking permit charges when the economy is suffering due to the outbreak of Covid-19 and has agreed to defer the introduction of the new charging regime until January 2020, so as to allow for a period of economic recovery and for residents to have adequate advance notice of the new charges coming into effect.

It is therefore recommended the objections be over-ruled and the introduction of emissions based parking permit charges be progressed.

Tee Fabikan - I feel it is not a good time to do this because:

- 1. A lot of people list their jobs due to Covid 19.
- 2. In order to keep self-alive, a number of people stopped using public transport and started to drive.
- 3. A number of people are afraid of catching Covid 19 so can only go out in private vehicles.

Officer Response: The council has considered the concerns that may arise from the proposed introduction of emissions-based parking permit charges when the economy is suffering due to the outbreak of Covid-19 and has agreed to defer the introduction of the new charging regime until January 2020, so as to allow for a period of economic recovery and for residents to have adequate advance notice of the new charges coming into effect.

It is therefore recommended the objections be over-ruled and the introduction of emissions based parking permit charges be progressed.

Ian Gibson and Agnes Viv state - Newham's proposed parking policy is not tackling the real issues related to driving and pollution in Newham. Specifically:

- 1. Having a virtual system of parking permits is not good. This has not worked for the car tax disc system and it will not work for Newham parking. It will be impossible for a passer-by, neighbour or resident to tell if a car is correctly parked.
- 2. Frequent idling of cars by those using recreational drugs in Newham parking spaces. This occurs both during the restricted period during the day and also at night when parking is not restricted. The cars are not actually treated as being "parked" as the occupants simply sit there, engine idling, and drive off if approached. Newham needs to enforce its current parking plan.
- 3. The criteria for applying for a parking permit have not been made clear.
- 4. Extra charge on diesel cars is not reasonable or justified. These cars are the ones that need to be parked so they should have discounted parking charge.
- 4. Driving in Newham, and therefore is for many, essential as the alternatives are not available or not safe. In detail:
- 4a. it is often not possible to get on the DLR and TfL trains in normal hours.
- 4 b Driving is the only option to travel with The COVID pandemic, for safety, or no capacity on public transport. Walking and cycling to work is not possible for many people
- 4 c there is no Santander type cycle scheme in the borough.
- 4 d Bicycle parking is inadequate.
- 4 e Frequent speeding by commercial vehicles and loose debris falling out are dangerous and a hazard to all, especially pedestrians and cyclists.
- 5. driving to schools should be discouraged.
- 6. More expensive permits will exacerbate the abuse or private parking.
- 7. Issuing virtual parking permits will encourage fraud and encourage on-selling of visitor permits. How will the borough prevent somebody from applying at a different address they live at? How will this be policed? The rightful resident cannot be paying a surcharge of £100 on top of the parking permit costs because someone applied first at his/her address before.
- 8. New categories of permits is not required, e.g. Charities should not be allocated parking permits different than business ones.
- 9. I do not understand how industrial permits should be more expensive than business permits. They should at the minimum be the same as they are more polluting.
- 10. The borough should look at blocking the London City airport extension and the Gazeley freight handling facility in the former Peruvian wharf in E16. This will have so much more impact on pollution than the proposed new parking scheme.

Officer Response: A virtual permit system enables CEOs to monitor permit issue for vehicles using a hand held device. If a vehicle is found to be parked without a valid LBN permit or without making the required payment a PCN will be issued for the relevant offence.

The application process for the virtual permit system is being undertaken by the Parking Enforcement team and they will ensure residents and businesses have sufficient notice of how to apply before the proposed implementation date.

In line with the strategy it is proposed that new banded charges for resident, business parking permits including Industrial Parking Permits will be introduced based on a vehicle's CO2 emissions. Resident permits for those with the least polluting vehicles will remain free, while those with more polluting vehicles will pay progressively more.

The council can also advise there are proposals in place to introduce a bike scheme to enable residents to hire bikes, Healthy School Streets schemes to restrict access to vehicles at start and finish times outside of schools and a reduced rate business permit for Newham based charities who require the use of a vehicle to undertake visits to premises (other than their registered charity address) within the borough.

The council has also invested in a network of air quality monitors for NOx and Particulate Matter (PM10) and third party monitoring for locations such as London City Airport for which constant monitoring will remain a priority.

The council has considered the concerns that may arise from the proposed introduction of emissions-based parking permit charges when the economy is suffering due to the outbreak of Covid-19 and has agreed to defer the introduction of the new charging regime until January 2020, so as to allow for a period of economic recovery and for residents to have adequate advance notice of the new charges coming into effect.

It is therefore recommended the objections be over-ruled and the introduction of emissions based parking permit charges be progressed.

Syed Ismail - I strongly reject the proposal as we can't afford to buy hybrid or plugin cars. During this pandemic rather than introducing the parking charges free for low income / no job residents. I am afraid council is trying to rip off the affected residents. Most of the people are on low paid jobs and Newham got more destitute people as compared to other boroughs. Same time, Thames water started charging 5 times more by putting metered bill on the residents. May be I can afford the parking charges (not the electric car) by sacrificing other things for the kids. But, I know most of the people in my neighbours can't afford buying hybrid cars. Please emphasise the government to help buying a hybrid / electric car.

Officer Response: The council has considered the concerns that may arise from the proposed introduction of emissions-based parking permit charges when the economy is suffering due to the outbreak of Covid-19 and has agreed to defer the introduction of the new charging regime until January 2020, so as to allow for a period of economic recovery and for residents to have adequate advance notice of the new charges coming into effect.

It is therefore recommended the objections be over-ruled and the introduction of emissions based parking permit charges be progressed.

Kiftzbro - Good thinking Sherlock whilst half the borough is furloughed or made redundant and struggling to pay rent, you now want them to pay extra £200 for parking permits

Dawn Skeritt - Being one of the only boroughs that doesn't charge a parking tax for first cars shouldn't be your reason for doing so. Trying to use the climate argument is condescending and a pile of tosh. Why start with your residents who can least afford such an expensive change such as upgrading to an electric car. What about buses? What about lorries?

I'm so scared this so called labour borough is slowly going to start pricing their poorest residents out of London. Most of us have our adult kids at home with us as they can't afford to rent privately or buy. Forget the council housing list.

Things like an additional charge being brought in at such short notice impacts the entire household especially if another adult in the home has to drive. This at a time when we are struggling to overcome the impact of COVID-19 on our friends, relatives and neighbours, Newham being the worst affected in terms of infection and death. Some residents have already lost jobs and many others are uncertain if they will have one soon regardless of the easing of lockdown.

Saeed Patel - Whilst I appreciate the purpose of this change what I seem to find difficult to understand is how the members of the Newham Council board can come up with a solution such as this. As you well know many of the residents are of extremely low income. Partly why many houses in Newham are overfilled with 15-20 people residing in one property just so rent can be split and to be able to afford rent. To be sanctioning these new proposals how do you expect residents of low income pay these additional charges? Yet alone buy a brand new car to be able to fall under the low permit charge bracket? Secondly Newham sanctioned the restriction zone through Browning Road. How exactly has that made matters better. It's made it far worse with Romford Road being extremely congested during peak hours. Thirdly Newham promote residents the use of electric cars. As I mention in the above residents are of low income so how is one to afford one? Not only that, how does one charge there electric vehicle if they have street parking and cannot be guaranteed a space outside their home. If

one has an electric car parked across the road or half way up the road. How exactly do they charge there vehicle? Run extension leads and cause a trip hazard? Would be interesting to know your solutions to this.

To be putting this into place at such difficult times whilst the world tackles with Covid 19 it is a shame that Newham would like to impose this during this difficult time. Whilst many are struggling due to being on Furlough or redundant due to pandemic putting more financial strain and effect on wellbeing to those less fortunate.

Officer Response: The council has considered the concerns that may arise from the proposed introduction of emissions-based parking permit charges when the economy is suffering due to the outbreak of Covid-19 and has agreed to defer the introduction of the new charging regime until January 2020, so as to allow for a period of economic recovery and for residents to have adequate advance notice of the new charges coming into effect.

It is therefore recommended the objections be over-ruled and the introduction of emissions based parking permit charges be progressed.

Ashikur Rahman - I am writing to represent my objections to the proposed Statutory Parking Consultation on permit parking charges.

It is apparent that you are not listening to the residents who have voted against the proposed residents permit charges on the informal online survey which closed on March 20th 2020.

Furthermore the survey was conducted online during the early stages of the pandemic and was not highly publicised. The survey started on the 2nd March 2020 and was due to close on 22nd March 2020. Newham council have acted extremely immorally and unethically, many residents would have been understandably distressed during the early stages of the pandemic therefore this survey should have been suspended. Nevertheless as the results of this 'informal' survey have been included in this statutory consultation you are obliged to act upon the findings from them rather than discount the findings due to a low response.

As I stated above residents understandably had other pressing issues during the pandemic to address. Unfortunately, the Council doesn't have any transparency which is evident within this statutory consultation and the FAQ's.

If residents are encouraged to leave their cars at home for short journeys then why charge them for parking their cars at home?

If residents are being encouraged to move to less polluting cars, then why not offer to install charging points in a street where every household purchases an electric car?

In the unprecedented times, when many residents have lost their jobs due to the COVID-19, with even more redundancies imminent it seems unjustified to implement such a charging structure given the demographics of the borough.

I hope you will take the above into account and abandon this consultation.

Graham Teale - I live in the Borough and vehemently object to the implementation of this charge. The grounds for such an objection are:

- 1. Lack on direct consultation with the residents of the Borough
- 2. A vast majority will be unaware of such a change.
- 3. Parking permits were sold to residents on the grounds that it would always be free for the first vehicle.
- 4. Live in an area that was never impacted by non-residential parking
- 5. The cost to residents in the time of COVID crisis is unacceptable
- 6. The cost to residents to change their vehicles to the free option is prohibitive at the moment, with the uncertainty on the economy.
- 7. No available charging points near to my home, the nearest being in a supermarket car park.

- 8. Increased cost to fit a charging point at my home.
- 9. Does not mirror the extension to the ULEZ zone.
- 10. No proposed charging for vehicles travelling through the borough and therefore discriminatory.
- 11. Discriminatory on the grounds of targeting low socio-economic groups, including ethnic minorities.
- 12. No compensation schemes to change their vehicles unless you are on a low income, which is odd when that group are far less likely to own a car.
- 13. We still would have to pay for visitors permits, who have a varying Co2 emission levels.
- 14. Because other Boroughs charge, it does not mean that one of the poorest Boroughs have to charge for a permit.
- 15. Biased policy targeting residents, whereas businesses such as London City Airport are the biggest polluter in the area. What is being done about that except them being allowed to offset. What about the parking for those businesses, whereby their employees travel into the borough on a daily basis.
- 16. What about all the private hire vehicles cruising the Borough awaiting pickups and the vehicles not from the Borough, mainly those around London City Airport.
- 17. Residents are an easy target and there is no overall strategy covering all polluters

Officers response: The Road Traffic Regulation Act 1984 (RTRA) as amended places a duty on the council to secure the expeditious, convenient, and safe movement of vehicular and other traffic (including pedestrians), to provide suitable and adequate parking facilities on and off the highway and to provide an attractive street environment for everyone and the implementation of residential parking zones borough wide has proven to be an effective way to achieve this.

Newham residents are however exposed to high levels of toxic pollution caused by vehicles resulting in the highest rate of deaths in England which equates to ninety six people dying prematurely each year. Newham also has the highest number of children admitted to hospital due to asthma-related conditions.

In response to the above concerns which not only affects residents living in the borough of Newham but is both a London and global issue and in advance of the proposed extension to ULEZ which is central to the Mayor's plans to improve the health of Londoners by cleaning up the city's toxic air, which leads to the early deaths of thousands of Londoners every year; an Air Quality Action Plan has been produced as part of the council's legal duty to London's Local Air Quality Management strategy. It outlines the actions we will take to improve air quality in Newham up to 2024 and aims to incentivise motorists to make more environmentally friendly choices which in turn will improve air quality.

In line with the strategy it is proposed that new banded charges for resident and business parking permits will be introduced based on a vehicle's CO2 emissions. Resident permits for those with the least polluting vehicles will remain free, while those with more polluting vehicles will pay progressively more.

The council has considered the concerns that may arise from the proposed introduction of emissions-based parking permit charges when the economy is suffering due to the outbreak of Covid-19 and has agreed to defer the introduction of the new charging regime until January 2020, so as to allow for a period of economic recovery and for residents to have adequate advance notice of the new charges coming into effect.

It is therefore recommended the objections be over-ruled and the introduction of emissions based parking permit charges be progressed.

A.6 Economic Impacts on Residents of New Charges:

A number of other related objections related primarily to costs and the economic impact on residents and businesses were received which have been grouped and responded to collectively below:

Margaret S Anfelix - I am opposing the changes to the increase in charges. Reason as follows if you increase the charge it will be the lower income bracket that will suffer as usual. Please think again. We all want lower omissions but it's a very small percentage that can afford electric cars or to buy lower omission cars.

M Amin - As a resident of Newham I object to the Emission based vehicle charging bands. Newham is one of the poorest boroughs in London and I don't see how you can encourage the people to go and buy new electric or hybrid cars. Does the council think the majority of the residents in Newham have the means to buy a new electric car? I certainly don't and would not even consider buying a second electric/hybrid car as they are very expensive to maintain and repair. I currently own a ford focus 1.6 which meets the ULEZ standard but under the council's proposals I would have to pay £100 for parking permit (not even £60). The vast majority of the residents will not be able to afford electric/hybrid cars the council am sure knows this and they will have to pay at least £60 to £100 for permits generating income for the council.

I have no doubts the council will go ahead with changes and after a few years will only increase permit charge. Where I live within 1 mile radius there are 4 or 5 different parking zones and I find that ridiculous. Why does there have to be so many parking zones in 1 borough? Simplify it and just have 4! North, south, west and east.

Shabaz Ahmad - These new proposals are affecting the poor and seeing as Newham is the poorest borough in London I don't see any positive impact from such proposals. Thank you for pushing those who are struggling further to the point of no return.

People who are surviving from hand to mouth, low income wages and zero hour contracts, to those who are getting from A to B on a vehicle that they barely can afford are not fortunate to splash out thousands on a brand new car to accommodate the needs of Newham council.

I find it insulting to attack our poorest residents with such proposals. This will result in residents not being able to afford the running costs of their cars (especially with a charge for the first permit) and may end up having to lose their only point of transport and freedom. It may result in residents being unable to get to work or places thus causing further unemployment, increase in mental health and far greater burden on our public services.

I also find it insulting when the Mayor or Newham council decide to compare our borough with other boroughs and how other boroughs charge for first permit and Newham doesn't etc. First of all, neighbouring boroughs (Barking and Dagenham and Tower Hamlets) both charge significant less than what Newham does (even the first permit) and their visitor permits are far lower than our current prices - yet you decide to increase our visitor permit rates further. Barking and Dagenham charge £0.75p for a 4 hour permit and £1.50 for an all-day permit. Why wasn't that mentioned??

Tower Hamlets have an excellent residential parking zone system whereby a resident zone isn't merely 7 roads (I.e. monega road permit) and instead have a wider area per residential parking zone. They also give their residents an option to park in other boroughs for a limited time without penalising them (something Newham council should learn from).

Being a qualified health professional covering most corners of Newham, I am ashamed to see the direction our council is heading and do hope that you recognise that there are many positives from neighbouring boroughs that need to be implemented into Newham. It is often very easy to say how amazing we are but can be difficult trying to accept that things can improve for the better of our

residents. Please learn from the neighbouring boroughs and think carefully before you pass such a proposal.

Farid A Ali - Hi, I like object to this proposal based on the reason following... Motorists are already being charged in the form of Road Tax, which is rated on the size and emissions of their vehicles, and now as the local authority you are proposing to charge us for parking similarly, based on the vehicles size and emissions? This is double charge to us and seems like an excuse to make money. A modern city will never be a place without cars and you can't get rid of it totally by charging drivers like that but surely will make money out of the situation. This so unfair. How many ways are we supposed to keeping paying?

There are many other ways to tackle and reduce air pollution but only taxing and charging people cannot be the way, and this seems to become a practice from all authorities. Cars on the road is not the only cause of air pollution. I request to abandon this proposal please.

Imran Ali - I am writing to formally protest against the increase in parking permit charges. Motorists are already being charged in the form of Road Tax, which is rated on the size and emissions of their vehicles, and now as the local authority you are proposing to charge us for parking similarly, based on the vehicles size and emissions? This is double charge to us and in a Borough where there are many low-income families, you are applying further financial strain by adding another charge.

There are many other ways to tackle and reduce air pollution but extra taxing and charging people cannot be the only way, and this seems to become a practice from all authorities. Cars on the road is not the only cause of air pollution. I strongly request that you abandon this proposal to increase parking permit charges.

Imran Ahmed - I have never come across a more ridiculous proposal in my life, all everyone keeps doing is taxing the tax payers, we already pay a premium to drive our cars, how many more taxes are you going to inflict on us, it is all about greed and nothing else and if you want to clean up the air, just propose a ban on certain vehicles which are polluting the environment, the govt have been doing this for many years and we are all fed up, if you have a very over populated area then it would be obvious that there would be more vehicles whether they are cleaner than others. It is unlawful and against our human rights to come up with more schemes to make money of the hard working, law abiding and tax paying public and what do we get in return nothing but dirty filthy streets, betting shops as far as the eye can see, all diesel vehicles should be banned, if you believe diesel cars are now cleaner then you are mistaken just look at the black smoke that comes out of them. If you keep raising taxes then inevitably you will see people protesting the streets all over and it won't be a pretty site. We don't even get parking on our road sometimes so what's the point of paying for a parking permit in the 1st place. I strongly oppose all these changes and I actually call for a reduction in charges by reducing the parking permit charge or taking it away all together, it is unfair.

Shabbir Bax - I wish to object against the proposed scheme on grounds that it doesn't serve the interests of the Newham residents and it also curtails freedom of Newham motorist. It also impacts financial stability of us residents by increasing permit costs by using emissions based tariffs that has no sustainable research in motorist's behaviour towards reducing emissions. Rather it superseded by revenue generation. How undemocratic is this considering past meetings followed by introducing a commission for democracy and yet our voices and concerns ignored. The proposal is very unfair. Leading to an environment of non-social trend where people no longer meeting their relatives or friends leading to further social depression in the community that is the poorest in the country. I'm very disappointed after engaging in many meetings at the Town Hall and in participating for democracy and yet to no democracy.

Sheeraz Begum - Hi i think this is so unfair. Will make people's lives harder as one of the poorest high poverty ridden borough how do we make a living & survive. These changes are ridiculous as we already have road tax emissions zone congestion charge list goes on. It will make life very difficult for people to get out and about and to work. Public transport fares are rocket highest in the whole of Europe.

There was a petition against all this and 88% people rejected these changes but looks like council is choosing to ignore it. Instead want to raise their funds.

I object to these proposals that have been made. I do not support this. I think this is an incredibly unfair, poorly organised and poorly structured proposal that will penalise, financially harm and make life incredibly difficult for us motorists and residents of Newham.

This is yet another way of making money from us by ripping us of and treating us unfairly. You have been doing this to us motorists for many years. I do not know why all of you Government Officials have raged a War Against us Motorists and the Car.

Your target of reducing car owner ship by 10,000 is a terrible, ridiculous and absolutely unnecessary proposal.

You need to Understand Cars are incredibly important, they are the only method of transport for many people who cannot wait many hours for public transport, cannot walk and cannot cycle due to public transport taking too long, walking not being feasible due to distance and cycle not being feasible due to inconvenience and safety issues. Particularly Old People Need the Safety and Comfort of a car to get around as Public Transport especially for long journeys is too uncomfortable and exhausting for them.

In addition there are Millions of Car Enthusiasts in this Country Like my Self Who Like Cars, Have Cars as a Hobby and enjoy buying cars, talking about Cars and Driving Cars. You are also trying to destroy this car enthusiast culture which is very unfair.

We pay road tax therefore we shouldn't have to pay to park on the street in front of near our house.

The fact that you charge a fee for the 2nd permit and car in a household is already ludicrous, unfair and financial harming to 1000s of people.

Please do not introduce a fee for the first permit and do not introduce a fee that is emissions based because this will financially ruin 1000s of people and make the cost of owning a car go up yet again.

I understand that you want to reduce emissions and improve air quality but this is not the correct method of achieving that.

You should not reduce emissions by punishing us motorists and us motorists with older higher emission cars. This is because a lot of people cannot afford a new or newer car that has low emissions, is electric or is hybrid. 1000s of us motorists in Newham Rely on our cars as an efficient, safe and reliable method of transport. Charging for the First Permit and or Basing the Permit System on Emissions will increase car owner ship costs yet again which will financially harm 1000s of people.

N Dayalji - Objections I have are based on the following:

- Upgrading to a brand new energy efficient vehicle is not financially feasible for everyone
- My parents, family and nearby family friends whom I support, are not as mobile and using public transport is not always an option
- Elderly/ and those that provide care should have access and right to park their car in front of their house
- We have family are not all based in the borough, and visiting them can only be by car
- Long standing residents of Newham should be protected and looked after

Amreek Hothi - I object on the grounds that i pay enough for council and this discriminates to users who cannot afford to purchase new electric/hybrid cars

Jamil khaliq - Now you want to charge for 1st car as well could you please stop that. I am sure you know people killing themselves and family being torn apart due to lack of jobs and low income.

Officer Response: The council has considered the concerns that may arise from the proposed introduction of emissions-based parking permit charges when the economy is suffering due to the outbreak of Covid-19 and has agreed to defer the introduction of the new charging regime until

January 2020, so as to allow for a period of economic recovery and for residents to have adequate advance notice of the new charges coming into effect.

It is therefore recommended the objections be over-ruled and the introduction of emissions based parking permit charges be progressed.

Alan Mayo - On the issue of the proposed imposition of charging for residents' parking I would like to register my objection for the following reasons:

- 1. What mandate does the Newham Mayor and the Council have to impose these charges? This proposal should be included in the Labour manifesto for the next Council elections and not be introduced before the electorate have had a chance to vote for or against it.
- 2. The Newham Mayor and Council will no doubt say that a public consultation has taken place but I think was a sham. During this process I previously registered my objections but never received a response. So I suspect it was just a cosmetic exercise to give the impression that residents' views would be taken into account whereas the reality was that the Council had no intention of changing their minds.
- 3. It is stated that most other London Boroughs already have charging. This is no justification. LB of Newham should be looking to do better for residents than other Boroughs, not just copying them.
- 4. It is proposed that charging levels will be linked to emissions. This is quite unfair as it will just be based on age and size of car and will take no account of condition of the car and how frequently it is used. I have an old car but it is regularly serviced and is in good condition and I only use it about twice a week. I will be producing lower emissions than a lot of newer, more frequently used cars yet will pay more. This is patently unfair.
- 5. The proposal will discriminate unfairly against poorer residents who cannot afford a newer car.
- 6. Will the charges also apply to residents in blocks of flats that have off road private parking spaces? If it is only going to apply to residents who park on the street this is unfair and discriminatory?
- 7. If this scheme is implemented despite objections there should be exemptions or discounts for senior citizens?
- 8. If the scheme is to be implemented despite objections it should not be done so before the expansion of the ULEZ zone as that will allow drivers a reasonable period to change their car or give up driving altogether.

I would appreciate acknowledgement of this submission and information on how my and others' objections are now to be taken into account.

Jennifer Murru - The purpose of this email, is to inform you that I strongly disagree with the proposed change in parking regulations in Newham. The points that I do not agree with is as follows,

- 1. Wishing to change the current first parking permit which is currently offered to all residents for free, to charge everyone
- 2. 'Air quality tax', for cars that are not hybrid or electric. This will affect over 95% of residents in Newham who rely on cheap motor vehicles for there day to day commitments.
- 3. Penalising key workers such as nurses, teachers who work in the borough and have to pay for an annual business permit which already costs £600.
- 4. Newham is already one of the poorest boroughs in London and all the proposed parking charges will affect every working family hard.
- 5. People have already changed their vehicles to comply with the new ULEZ rules that will come to in effect next year. To then suddenly introduce an additional air measure is too excessive and is unnecessary.

Could you please not disregard this email as it is extremely important to not enforce something that a majority of Newham residents object to.

Sufwan Nawab - Wow. We keep hearing Newham is one of the poorest areas in UK. BLAH BLAH BLAH. And now what the thieves at The council are proposing. Your just trying to take more money of the residents which they have not got. Honestly this is the worst and the greediest council in the UK. Put the council tax up. And now this. You lot should be embarrassed and the way you lot are trying to justify this is just cringeworthy. In the last 20 years living in Newham have become more expensive than ever. The blame solely lies on the council.

Billy Osbourne - I object on the basis That for years when west ham was playing in the area you gave us nothing and let people park all over the place when they left you came up with this parking permits which is nothing but a money-making scheme for the council And now that's not enough what next charges for air no no no no no no and in case you didn't understand no

Firozuddin Patel - I disagree with the new parking changes and its introduction to charging by emmission. Rsasons why;

- 1.Ulez is being introduced to newham next year in october where the london mayor has asked polluting cars to pay a daily charge for driving certain car. This is a detterent coming in, so resident now have to adjust cars and change. so why is Newham council trying to introduce a system now as a last second resorting to penalise resident twice. I say your are too late. As you say you are introducing these measures to change behaviour and thinking.
- 2. Your air pollution targets seemed to be set upon penalising resident which live in newham and not people who drive in to newham. This in its self is discriminatory. You cannot hold newham resident to account for all pollution.
- 3. Newham have since been doing all they can to target resident and build on taking in money. Council tax hikes. Manor park rat run closure which was ridiculous as i can show you other rat runs in newham which have been left out of foresight. Green street double lines and no parking so shoppers cant even pull up to pick up shopping and family or cab driver can pick up customers. Seems a ply to give out tickets. Not thought about out at all. Just newham seeing pound signs.
- 4. You have not communicated these changes well based on the these changes i would expect a letter sent out and a survey to see how many residents are for and against. As i know alot of Newham resident are diverse and a may not be used to the internet. i only found out this through internet. And many residents are not aware. I think your being very sneaky. You are levying a cost of £60 minimum and i think its only right you communicat this well. I am sure you have done the maths on how much income you will recieve from this.
- 5. Road tax accounts for cost and detterents too. You think you can charge newham residents both on a local level as a borough. Then on a london level with ulez and the on a national level with the road tax. This is not on.
- 6. Residents are entitle to free parking if they live here. Minimum one car. Do what you you want with your sencond permit cost. full stop.
- 7. Further evidence of you raking in money on top of council tax is the visitor fee increase and the lack of service you provide. The cost and service do not go hand in hand. When newham opted to going online newham should have reduced costs for resident but no they still remain the same and keep going up.
- 8. There is a lack of parking now as newham have seen to be giving out parking permits overly without taking into account for parking space in any given area.
- 9. You say you are one of 2 boroughs who have not introduced these measures. This does not justify nothing. Newham residents are different from alot of other boroughs, your changes are down to this new mayor who has hiked council tax and inturn rewards employees with a pay rise at a cost to newham residents. Other council borough are not as poor as newham. You do not account for differences just one variable that everyone else has done it.
- 10. You must have had a good response from the public consultation that took off in feb or march this year. You did not state in your newham news article the outcome nor does the newham website indicate your findings. For you to go ahead with this and not disclose this information to your resident

is very curious and may need resident to investigate if the borough is being devious and not taking to account the views of resident.

I would also like to request information.

- What was the outcome.of the public consultation in march of this year and what is the findings for and against these proposals?
- How many parking spaces there is in the borugh and how many parking permits you give out each year?
- How have uou communicated these change and was there a proper drive to get this communication across to residents. Or was minimilistic?
- Also how you have taken into the account the london ulez charges coming into newham next year when approaching the introduction of these emmisions based permit charges?

Penny M - I object the consultation on the following grounds:

- 1. Lack of local services hence we need to travel We take our children to take part in various extracurricular activities, none of what they do can be found locally within my local area, or even within Newham. The lack of activity providers and the poor performance of Active Newham, all of these make us need to travel long distances. With our children, the only possible way is to use a car. We access Active Newham via their website, there are very limited activities for children in Newham's leisure centre, apart from swimming lessons and birthday parties. Some people say they do other things, but I could not find any details anywhere. The information is not accessible, or their promotion is not effectively.
- 2. Cost of low emission vehicles too high As a family, as we need a car, it needs to meet our requirements on children safety features (rear window control, safety factor, spaces for children car seats, door opening width, etc). There are very limited choices in the markets that can suit our budget. Low emission vehicles that can be qualified for the proposed Tier 1 Resident Permit Emission Tier Charge (or HMRC Bands A and B) are higher than cars of other HMRC bands. For us, there is no reasonable choice in the market that could both meet our budget requirements as well as be low emission.

The government has already penalised us via Vehicle Excise Duty for not being able to afford a lower emission, but more expensive car. It jumped from £20 annually previously to now £155 for the same car. Now Newham is proposing to penalise us again for the same car, which we need to meet our basic needs due to local facility/ service deficiency.

3. Large Majority of responses disagreed in the March 2020 Consultation - 88% of those responded in the March 2020 consultation disagreed with the proposed emission based parking charges. Newham Council needs to listen to the people. On this ground, I object to the proposals in the statutory consultation.

I am disgusted by Newham Council's deliberate misrepresentation and distortion of the consultation result, in which an overwhelmingly large majority of responses disagreed with the proposed emission based parking charges. It poses risks to the council that could result in a legal challenge. Whether it was done by the council staff or by an external agent, I am asking for those involved to hold accountable for the irresponsible, misleading and potential trust-damaging actions.

Officers Response: The Road Traffic Regulation Act 1984 (RTRA) as amended places a duty on the council to secure the expeditious, convenient, and safe movement of vehicular and other traffic (including pedestrians), to provide suitable and adequate parking facilities on and off the highway and to provide an attractive street environment for everyone and the implementation of residential parking zones borough wide has proven to be an effective way to achieve this.

Newham residents are however exposed to high levels of toxic pollution caused by vehicles resulting in the highest rate of deaths in England which equates to ninety six people dying prematurely each

year. Newham also has the highest number of children admitted to hospital due to asthma-related conditions.

In response to the above concerns which not only affects residents living in the borough of Newham but is both a London and global issue and in advance of the proposed extension to ULEZ which is central to the Mayor's plans to improve the health of Londoners by cleaning up the city's toxic air, which leads to the early deaths of thousands of Londoners every year; an Air Quality Action Plan has been produced as part of the council's legal duty to London's Local Air Quality Management strategy. It outlines the actions we will take to improve air quality in Newham up to 2024 and aims to incentivise motorists to make more environmentally friendly choices which in turn will improve air quality.

In line with the strategy and as part of the Mayor of London's Go Ultra Low City Scheme the council has already installed some electric car chargers in the borough and will be installing a further 40 double electric car chargers on nominated residential roads during 2020/21. In addition to this the council is applying for further funding to expand the network of electric chargers throughout the borough.

The council has also invested in a network of air quality monitors for NOx and Particulate Matter (PM10) and third party monitoring for locations such as London City Airport for which constant monitoring will remain a priority.

Within Residential Parking Zones (RPZs) residents can apply for a permit which entitles them to park within permit holder bays at any time during the controlled hours of their zone without time limit. Whilst granting a permit allows the use of a space in an RPZ, there is no entitlement to or guarantee of a specific space within the zone. However, by discouraging certain groups of non-residents from parking in an area, an RPZ increases the likelihood that a resident can park close to their home and helps to encourage, via the use of emissions-based charges, consideration for vehicle usage and type change.

In 2012 it was agreed the first resident permit per household would remain free of charge but with growing concerns surrounding climate change and air quality there is a need to incentivise motorists to make improvements to air quality. The council's residential parking zones had been implemented at a time when emissions-based permit charging was in its infancy. Subsequently many London boroughs have introduced some form of emission-based permit charging and are finding this to be an effective tool in reducing vehicle emissions by influencing behavioural change and to help improve air quality. The proposed introduction of emission-based parking permit charges is therefore similar to those already operating in many London boroughs.

The council has undertaken two distinct public engagement phases; the first in the spring of 2019 and the second in March 2020. The initial phase consultation results showed two-thirds of residents wanted measures adopted to improve air quality and reduce car use however the second consultation did not indicate such a clear majority for the implementation of an increase in emission-based parking permit charges.

An analysis and evaluation of the positive and negative impacts from the new charges concluded that the reasons for introducing emission-based parking charges outweigh the reasons for not implementing them.

The council has considered the concerns that may arise from the proposed introduction of emissions-based parking permit charges when the economy is suffering due to the outbreak of Covid-19 and it is for this reason the implementation of these proposals would not be introduced until January 2021, which would enable residents / businesses additional time to make alternative travel arrangements.

It is therefore recommended the objections be over-ruled and the introduction of emissions based parking permit charges be progressed.

Neil Preston - Yet again another taxation. I'm 65 and living on my own. I need the car for my weekly reasons, not only for myself but my 83 year old house bound neighbour. I'm unemployed but cannot

claim any benefits and yet newham are hitting me yet again. I've lived in newham for 42 years, have no children and paid my council tax every year.

Beena Puri - I would like to put forward my strong objection to the draft notice of statutory traffic management order, for the reasons below:

- Newham residents are paying taxes and should be granted the ability to park their vehicle infront of their home for free.
- My parents are Newham residents for over 50 years and are pensioners. They share a vehicle for ease of mobility as they are both restricted and unable to walk for long distances. They should not be reprimanded and should be allowed to access parking outside of their house without being financially impacted.
- -On numerous occasions, visitors park in front of their house and they have had to park further down the road which has caused distress and inconvenience when carrying shopping loads. Residents should not be penalised, especially those that are of pensionable age and less mobile.
- Charging residents for parking their first car is putting those with low incomes or on pensions at further disadvantage.
- -I would suggest that parking restrictions are proposed for other roads for non-residents. It is not encouraging residents particularly families, the elderly or those with mobility issues to feel like they have the freedom to live and feel safe in their own homes and society and it ensure those that are already anxious about going out of their house deeply impacted. Cycling and walking distances with shopping is simply not an option for them.
- -With the increase in criminal activity and drug dealing that is highly visible in the area, I would feel strongly that my parents shouldn't be forced to walk in areas of concern and I would be very concerned about their safety. I would like to know how the council are addressing those concerns to ensure the streets are safe, clean and well lit and that residents feel protected.

Chris Reed - As you know newham is one of the poorest boroughs and yet you want to make residence pay more to park at their homes!!

It's bad enough that people have to pay for a permit to visit family!! Abolish the parking permit system all together!!

Sajed Salam - I object to this proposal. We already pay road tax which is rated on the size and emissions of the vehicle. Now as the local authority you are proposing to charge us similarly, based on the size of the vehicle and emissions. This is doubling the charge and seems more like a money making scheme. This seems very unfair. I for one will be joining any and all protests against this.

I live in Newham and am Disabled. I have a car that I rely on to get me from A to B such as hospital appts and GP appts and to do my shopping and so forth.

Farzana Shakoor - With regards to the councils proposals; I always endeavour to support any green policies especially those that promote cleaner air. However, I feel this particular policy of introducing 'Emissions Charging' is unfair for the following reasons, and therefore I cannot support it:

1. It is unfair that residents living in Newham should pay an emissions charge whilst other motorists driving into Newham, and thus contributing to the poor air quality here, are exempt from this charge. I have suggested many times to Newham Council before, to abandon the majority of the 'Pay & Display' bays in Newham in favour of 'Residents only' parking. This will bring us inline with the parking policies of other boroughs such as Haringey and Walthamstow where it is impossible to park anywhere if you are not a resident or hold a permit. Such a policy will similarly discourage people from driving and parking in Newham and thereby contributing to the poor air quality here. But unfortunately this has been rejected as it does not 'support businessess in the area', and obvioulsy doesn't raise any revenue. And so once again we see conflicting interests and the council playing 'ostrich'. Why has this not been considered before introducing an emissions charge? There are many motorists driving into Newham from outside to undertake various activities, such as shopping for ethnic goods, dining in ethnic restaurants and using religious facilities in Newham. However, under the current proposals they are exempt from any such emissions charges here, and this is unfair to local residents.

2. There are other ways of encouraging local trips by sustainable modes of transport such as walking and cycling which should have been actioned before the introduction of an emissions charge. The latter should be the absolute last resort.

The Parking Consultation talks about 'enouraging more local trips by sustainable modes of transport such as walking and cycling'. However, there are other actions that should have been undertaken before the introduction of an 'Emissions Charge' which should be a last resort. It seems the councils reasons for wanting to adopt this is because other boroughs have done it and its worked well for them, and we need to meet these targets too. We need to think outside of the box and find more creative solutions that work for our borough. I would like to see foot paths widened every where in Newham first. Newham has some of the most busiest and congested foot paths due to severe over crowding. It has been impossible in some areas to maintain social distancing during the pandemic due to this. Certain exceptionally busy roads eg. Green Street and East Ham High Street North should be fully, or part pedestrianised (in the least), to encourage people to walk\ cycle more. This should have been considered before the introduction of an emissions charge, but alas we find the council conflicted towards supporting businessess again. Although East Ham High Street is part pedestrianised, this absolutely requires extending due to the sheer numbers of people using the foot path. Pedestrianisation will allow people to use the full width of the road to walk and thereby mantain social distancing. At the moment it is impossible to walk down East Ham High Street without mothers pushing their buggies over your feet, or to ride on the foot path in a wheelchair or electric scooter due to the sheer volumes of people. I'm therefore not surprised that Newham has one of the highest Coronavirus infection rates.

3. Improve public transport, especially busses in Newham.

Public transport, especially buses are severely overcrowded in Newham. It is impossible to get a seat on a bus, and even worse if you are disabled and need to use the area reserved for wheelchairs as it is often occupied by buggies and owners refuse to move them. My mother is severely disabled and we often have to wait for the 2nd or 3rd bus before we can get on. That is assuming the ramp works, which we have found to be very temperamental on busses. If you want people to ditch their cars, then you need to 1. Improve public transport, 2. Deal with overcrowding in Newham, which often forces people into their cars in order to get some personal space away from everyone else.

4. Emissions Charging is unfair as it does not take into account mileage.

Emissions charging should be based on mileage to be absolutely fair. The more you use your vehicle eg. in commuting to and from work, the more you pay . I have a small car that I use for essential trips on the weekends only. This includes a very large family shop for which public transport is not suitable, and for mostly taking several disabled members of my family to and from their regular hospital appointments. Again, the nature of their disablity means that public transport, and the over crowding therein is not suitable for them. I have an annual travel card that I use for commuting to and from work, and my annual vehicle milieage is less than 1000 miles per year. Under the new proposals I will be paying £100 emissions charge for running a vehicle for which 80% of the time is serving the needs of those less able. I feel this is penalising me. Somebody else on the other hand, could be using a more energy efficient vehicle and therfore paying a lower emissions charge but is then using this vehicle to commute to and from work and therefore their overall contribution to poor air quality (CO2 output x mileage) is higher. This charge does not clearly reflect that.

5. Vehicles registered to Blue Badge holders should be exempt from this charge in line with other charges that are they are exempt from, such as the Congestion Charge.

So overall, this policy is very much a roughshod way of trying to deal quickly with a problem that the council has played 'ostrich' with over the years, due to conflicting policies in favour of supporting businessess. There are several other actions as I have outlined above that should be actioned before this, of which 'Emissions Charging' should be the very last resort. But I suspect that they have left it too late to do this now, and will bulldoze this policy through regardless of residents views in order to meet clean air targets, and to obvioulsy raise revenue.

Mr R. Skeete - I am on low income and can not afford to buy a Plug-In Hybrid or Electric car. I suffer from Depression and Anxiety and this is an added worry to me. I have to find money that I don't have and this is really stressing and worrying me. I would therefore like to ask you to take into consideration Disabled people that are on low incomes and who are not fortunate to buy themselves a new car that

meets your standards. When this comes into play, this is going to make my life extremely difficult. I can not afford the amount you are asking for.

I think the Council should leave the first car free and charge for the second car. And for those who have more than one car. Because some people have more than the one car at the one address. Disabled people should be discounted in any fees that may apply.

Cecila Walters - I object to the new parking fees. I am due to retire in the 2021, age 66 years old. I will be a pensioner on £175.22 a week, council tax £92.00 a month, electricity and gas to pay, food to buy, TV licence to pay, insurance and tax and hopefully not, car permit to pay on my car. I need my car to get around as I have a disability. Some things will have to give and it's either food, heating snd other things as I will not be able to pay for everything. I can't ride a bike or walk too far. So, tell me, is the major leading by example e.g, how does she get around, I am sure its not by walking or riding a bike. Is she chauffeur driven? Just asking. Again, it's the worse off in Newham who once again, suffer by these dreadful decisions made by those in power in Newham.We dont appear to have a voice anymore. I used to love living in Newham, but not anymore. Things have gotten worse over the last 2 years. You don't care about our opinions, you have really no interest in Newham residents. We are urged to make an appeal against the permit fees, but I am sure you already made your decision. I just want my voice to be heard.

Catherine Wiseman - I'm emailing my objections to the increases of the parking charges within Newham. Newham is one of the poorest boroughs in London. Some people may have a car that they majorly rely on to get them to work etc but maynot be able to afford to pay additional costs for the parking permit. With having too not only pay for high priced petrol, road tax and car insurance, they then have to pay an huge increase just to park their car outside their homes! Also the emission zones that come into place next year will cause a huge increase in forking out more money. Many who rely on their car might be faced with the prospect of having to get rid of it as they no longer can afford to pay out for all these extra costs.

I love the permits. My way of life has dramatically increased since the permits have been put into place, however what makes me really cross is living opposite Royal Wharf in E16. They all drive huge, expensive cars. They can all get 30 FREE visitor parking permits every year, and then 10 FREE All Newham zones permits a year. I know they can't get resident parking permits which makes me really happy but still their guests park on my street, making it impossible for me to park near my own home, all because they don't want to pay £15 for 24hr parking in their development. I think its wrong. I know many residents in Britannia Village who are getting fed up with Royal Wharf residents parking constantly in our area for FREE. It makes it hard for us residents to park on our own streets, let alone near our homes! Many people are moving out of the area because of this.

Also a lot of pollution in this area is caused by the huge lorries in and out of Knights Way. There are proposals for a LORRY PARK to put built in E16. Why should we as residents have to pay extra money for a residents parking permit when you're about to bring in an extra 2000+ Lorries A DAY. The rise in pollution will be enormous in this area. It's just badly thought out and inconsiderate for the council! So all in all, I DO NOT AGREE with the rise in resident parking permits!

R Zaheer - I object to new proposed parking charges in Newham and oppose any new charges, especially when people are losing their jobs left right and centre.

Officers Response: The Road Traffic Regulation Act 1984 (RTRA) as amended places a duty on the council to secure the expeditious, convenient, and safe movement of vehicular and other traffic (including pedestrians), to provide suitable and adequate parking facilities on and off the highway and to provide an attractive street environment for everyone and the implementation of residential parking zones borough wide has proven to be an effective way to achieve this.

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In response to the above concerns which not only affects residents living in the borough of Newham but is both a London and global issue and in advance of the proposed extension to ULEZ which is central to the Mayor's plans to improve the health of Londoners by cleaning up the city's toxic air, which leads to the early deaths of thousands of Londoners every year; an Air Quality Action Plan has been produced as part of the council's legal duty to London's Local Air Quality Management strategy. It outlines the actions we will take to improve air quality in Newham up to 2024 and aims to incentivise motorists to make more environmentally friendly choices which in turn will improve air quality.

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In 2012 it was agreed the first resident permit per household would remain free of charge but with growing concerns surrounding climate change and air quality there is a need to incentivise motorists to make improvements to air quality. The council's residential parking zones had been implemented at a time when emissions-based permit charging was in its infancy. Subsequently many London boroughs have introduced some form of emission-based permit charging and are finding this to be an effective tool in reducing vehicle emissions by influencing behavioural change and to help improve air quality. The proposed introduction of emission-based parking permit charges is therefore similar to those already operating in many London boroughs.

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An analysis and evaluation of the positive and negative impacts from the new charges concluded that the reasons for introducing emission-based parking charges outweigh the reasons for not implementing them.

The council has considered the concerns that may arise from the proposed introduction of emissions-based parking permit charges when the economy is suffering due to the outbreak of Covid-19 and it is for this reason the implementation of these proposals would not be introduced until January 2021, which would enable residents / businesses additional time to make alternative travel arrangements.

It is therefore recommended the objections be over-ruled and the introduction of emissions based parking permit charges be progressed.

A.7 Other objections raised:

A number of other related objections which did not fall into the other groups were received which have been responded to collectively below:

Micheal Beech - I oppose the new parking permit charges as I don't think this scheme will do anything but generate more money for the council which I feel is obviously the aim under the guise of 'tackling poor air quality'.

There are already plenty of parking restrictions to try and deter people from driving in Newham which are not working. I'm happy to extend the resident parking permit to 12 hrs and feel parking restrictions at weekends already in place are harsh are unnecessary so would prefer weekends to be without restrictions to help residents with visitors.

I am happy for you to introduce more electric car charging to encourage green vechicles.

If the council want to show they are serious about this issue they would follow in the lead of Waltham Forest and close of some streets for pedestrianisation such as Green St. They would do more to try to get City Airport closed and stop any plans for the Silvertown bridge / tunnel.

This is clearly an attempt to generate income and will not affect air quality in Newham.

Muhammed Ahmed - Ive bought a car that meets Ulez standards and according to the proposals i will still have to pay £100 on top of my permit charge. The cabinet report justifies the emissions charges quoting high levels of NOx and PM emissions in the borough, but then uses CO2 values to charge residents who drive cars with low NOx and PM values - this is ridiculous. Also, I don't understand why I would need to pay an emissions charge on top of my parking permit if my vehicle is not producing any emissions whilst it is parked and switched off. Does the council intend to charge an emissions charge to those who drive through the borough?

Adil Gulbahar – I am writing to object to the proposals put forward by your department and wider local government officials. The basis of my objection is three-fold - poverty, gentrification and discrimination.

Newham is one of the poorest boroughs in London with average income per household being £22,169 (mean) / £19,402 as per 2017. Abject poverty and relative poverty is prevalent in the borough. Newham is also home to larger families who look for the most effective way to travel. Larger families foster togetherness and dependence, not only out of emotion but under the pretence of relative poverty, it is out of financial obligation.

Individuals here cannot afford to pay on the basis of CO2 emissions as they need a fuel efficient car for travelling. In most cases, this would be a 7 seater. The emissions based charging method is in essence discriminatory as BAME people tend to have larger families on average where public transport does not work out as cost effective on the basis of one or two incomes in a house of 7 people. Moreover, the elderly are often looked after personally by these families, hence the need for cost effective transport.

Electric cars are also not as cost effective due to higher purchase prices and cost of battery replacements meaning there is no longevity. How far will the electric vehicle take you? The real-life range of these cars is far less than a diesel or a petrol on one charge/one tank. A diesel can do 500 miles on a 63 litre fuel tank (combined mpg), whilst a petrol car can attain 400 miles. Hybrids may be slightly cheaper than fully electric vehicles but are prone to more issues. Many in Newham work in roles where they need to commute out to the home counties by car. A fuel efficient, cost effective car will be needed that does not need electrical work on a regular basis.

This is a similar strategy to the Borough of Lambeth and how they impacted areas such as Brixton. Lambeth implented a CO2 based strategy. Gentrification has proven to have priced many out of the area. Newham will be doing the exact same. Black, Asian and other minority ethnic families will be forced to move to zone 5 and in some cases even further. The policy will not assist the population, rather it will displace the current generation of young adults.

If you decrease disposable income for individuals in Newham who are trying to save in order to accumulate enough wealth for a deposit, how do you ever expect the area to improve for the individuals living here? People will be able to respect the area more when they feel invested in an area that has given them the opportunity to grow. Moreover, how do you anticipate the effort-reward ratio to translate to realised benefit? Many Newham residents have focused on educating the next generation as they need to excel compared to their counterparts of differing racial backgrounds, class and wealth status in order to gain entry to the same firms that their counterparts have less barriers to entry due to nepotism or class.

Mohammed Janjua - If you really want to improve air quality, you should improve air quality and reduce emissions by giving people funding and money to buy newer less polluting cars. You should not discourage car owner ship instead you should encourage car owner ship but thorough giving people money to buy more efficient new cars.

The current Government Grant of £3000 for electric cars is no were near enough. The Government should be giving people at least £10,000 toward the cost of an Electric Car that will help people buy the more efficient less polluting cars.

Jim Ludlam - I find the proposals almost hypocritical, given the Blackwall Tunnel etc extensions proposals. Many of my neighbours DO find them hypocritical. Practical considerations make the scheme impractical.

These proposals are made in the shadow of the Covid-19 pandemic, at time when a large proportion of the borough's population isn't able to work, something which will take them a long time to recover from even if we don't have the second wave anticipated by many many medical experts. The current parking scheme's only been in force for a short while and the anticipation of change is now a considerable worry to many people who won't be able to afford to pay for an annual permit and certainly won't be able to pay for a low emissions vehicle, even with the £3,000 grant. Many of our cocitizens have enough to worry about.

They are also made at a time when our public transport system is under threat through lack of finance available to Transport for London; there's no expectation that things will improve for some time and cuts are foreseeable.

EFFECT OF BLACKWALL TUNNEL EXTENSION ETC - There are currently 2 issues hovering over the borough which will make a huge difference to people if they go ahead but both are completely contrary to what the council's plans for parking are aimed to achieve.

The Blackwall Tunnel extension's planned to come straight into Newham, in the Canning Town North/South area. This area's one of the worst in the borough for pollution, mainly because of the proximity of the Canning Town "roundabout". I can find no specific data which measures this but it's widely accepted that the increase in the number of vehicles coming into Newham will significantly make worse the quality of air in Newham, especially along Silvertown Way and roads towards the A13 at Beckton Flyover, and Barking and Beckton Roads in E16.

Then there's the proposed lorry distribution centre further south in the borough with an estimated 2500 lorry journeys daily plus over 600 car journeys. The impact on air pollution would be phenomenal if this application's improved – lorries themselves are the dirtiest vehicles on our roads and this would be made worse by low gear movements up the ramps used to stack vehicles.

Both plans seem to be saying, let's drop nasty things on Newham and let the residents make up for it, which is totally unacceptable.

PRACTICAL ISSUES - Newham wants a move to low-emission vehicles. Only 2% of the vehicles on the UK's roads are hybrid, plug-in hybrid or electric. It's estimated that there'll be 9 million of such vehicles

by 2030 but the current pandemic's expected to slow this. The proportion of these vehicles in Newham's minute for a number of reasons, mainly that people can't afford them – this is one of the poorest boroughs in the UK, after all. There aren't enough pre-owned vehicles to make the situation much easier and a rush to them, even by a fairly small group of pole, will only push up the price of those that are available.

The council's proposals to reduce the number of "dirty" vehicles surely cannot mean taking vehicles away from people who need them but can't afford to replace them.

Paperless wallet – the proposal for introducing paperless wallets is asking for trouble and will make the present system unfair. It's estimated that the government's lost £280 million through paperless road tax discs, because people have cheated the system. Not only is this an important loss to the exchequer but it cheats we honest people who pay for our road tax. A paperless wallet for Newham will create an equally unfair situation, allowing motorists to evade payment of their permit fee.

Charging – The proposals make no reference to charging electric vehicles. Much of the housing in Newham is terraced or flats with, increasing lack of parking. A plan to get people to move to electric vehicles relies on home charging facilities which, even with a 75% grant, isn't practical in that the terraced homes will end up with cables running across pavements – this is already beginning to happen and is dangerous and impractical.

Public charging pints are no solution – there are few in Newham (95 at the time of writing) and they are mainly in impractical places like the hospital car park, Westfield's car parks, The Crystal, and so on (and it's interesting to note that most of the ones in the street aren't working, again as I write.

I am not arguing against a move to clean air. I simply suggest that the current proposals are impractical, at the wrong time, and will adversely effect a large proportion of the borough, which has enough problems as it is.

CONSULTATIN PERIOD – There are a number of hazards in consultation at the moment. The local paper's circulation is down as people don't pick it up as they g to work – this because so many people aren't going to work – and there's a very low incidence of computer use in the borough, so many people know nothing of this consultation. 21 days really isn't long enough.

Brendan Moran - I disagree with the increase of cost of permits overall generally. Pollution is a major factor in Newham. We have major arterial roads through newham, city airport. Why should Newham residents pay for pollution caused by through traffic and an airport. We are a quite deprived borough putting more costs on residents is not fair or reasonable. Whilst I agree we have to improve air quality we also needs cars and cans to move deliveries etc and businesses need to operate.

Moe Riaz - 1. People with 3rd car should be charged £100 premium not 2nd car, on average I think most people in the uk have more than 1 car.

2. The council hold consultations, when it goes against them and residents do not want it the council go ahead and do it anyway against the residents wishes

Julie Selhep - I am writing to object to the proposals for the following reasons;

- 1) this appears to be based solely on environment reasons. In reality it is simply a Penalty tax on car owning Newham residents ,whilst the main source of high traffic pollution in the borough ie major arteries (A11, A12, A13, Blackwell Tunnel) Is not addressed. I understand the increased income will simply go into the General Fund not to environmental schemes.
- 2) There has been a great deal of focus on the statistic that only 50% of residents are car owners. It is implied that this presents an inequality of health/ disadvantage to Non car owning low income households. There has been no evidence presented to support that. It is probable that a significant %

of low income households do have cars and these are essential for work etc. The cost increase will hit many residents very hard especially at this time of job losses /Economic uncertainty.

- 3) The proposal of staggered charges by emission levels again are likely to hit lower income households the hardest. It is a fallacy that people can easily afford to change their cars to more recent and expensive green models.
- 4) I query how widely publicised this consultation will be and whether it will reach ALL groups of residents. The public agenda in recent times in Newham has been "climate health emergency = all cars bad = everyone should walk/ cycle". Prominence is given to the loudest campaigning interest groups e.g.Newham Cyclists and frankly the more politically active (mostly middle class) residents. I imagine a truly representative consultation would present a wider spectrum of opinion on the proposal.

Stephen Wray - I would like to provide the following feedback to the statutory parking consultation. The replacement of paper permits under 2. (i) to a virtual system is discriminatory against many in the older generation who do not have a computer, smart phone or internet access. My neighbours already have a difficult time accessing many council services because of limited other actions and often ask me to help. Where there may not be so much notice, they may not be able to have visitors when they wish and therefore increase their isolation and hurt their mental health.

It is also unclear what will happen with the existing paper permits and whether they will be voided when the changes come into effect.

2. (v) will discourage people from taking more green forms of transport, such as cycling, where the council should be focusing its efforts. Therefore this change is likely to increase emissions in the borough.

The proposed banding is bias towards putting a large number of vehicles in a fee band. My vehicle achieves 50 MPG and we drive it infrequently, but because it is older than 2001, it is not in the free tier. Very few cars have a capacity less than 900cc. The free band should include at least the HMRC "C" band, which would provide a more fair distribution. This is in fact what is done for the business and industrial permit, so it seems extremely unfair that for business use my car would be free.

Shimon - As a resident of Newham. We are paying a lot. Why do you want to charge us more to park in our own street? We pay council tax, road tax, still you want more. If i buy an electric car, can you provide a designated parking area outside my house so i can charge the car overnight? 50% off my street has a driveway at the front of the house. I been told not enough space for drive away but i know there is enough space. May be not for a truck but for a small car like mine should be no issue. Council only want to do what benefit the office and not resident.

Officers Response: The Road Traffic Regulation Act 1984 (RTRA) as amended places a duty on the council to secure the expeditious, convenient, and safe movement of vehicular and other traffic (including pedestrians), to provide suitable and adequate parking facilities on and off the highway and to provide an attractive street environment for everyone and the implementation of residential parking zones borough wide has proven to be an effective way to achieve this.

Newham residents are however exposed to high levels of toxic pollution caused by vehicles resulting in the highest rate of deaths in England which equates to ninety six people dying prematurely each year. Newham also has the highest number of children admitted to hospital due to asthma-related conditions.

In response to the above concerns which not only affects residents living in the borough of Newham but is both a London and global issue and in advance of the proposed extension to ULEZ which is central to the Mayor's plans to improve the health of Londoners by cleaning up the city's toxic air, which leads to the early deaths of thousands of Londoners every year; an Air Quality Action Plan has been produced as part of the council's legal duty to London's Local Air Quality Management strategy. It outlines the actions we will take to improve air quality in Newham up to 2024 and aims to incentivise motorists to make more environmentally friendly choices which in turn will improve air quality.

In line with the strategy and as part of the Mayor of London's Go Ultra Low City Scheme the council has already installed some electric car chargers in the borough and will be installing a further 40 double electric car chargers on nominated residential roads during 2020/21. In addition to this the council is applying for further funding to expand the network of electric chargers throughout the borough.

The council has also invested in a network of air quality monitors for NOx and Particulate Matter (PM10) and third party monitoring for locations such as London City Airport for which constant monitoring will remain a priority.

Within Residential Parking Zones (RPZs) residents can apply for a permit which entitles them to park within permit holder bays at any time during the controlled hours of their zone without time limit. Whilst granting a permit allows the use of a space in an RPZ, there is no entitlement to or guarantee of a specific space within the zone. However, by discouraging certain groups of non-residents from parking in an area, an RPZ increases the likelihood that a resident can park close to their home and helps to encourage, via the use of emissions-based charges, consideration for vehicle usage and type change.

In 2012 it was agreed the first resident permit per household would remain free of charge but with growing concerns surrounding climate change and air quality there is a need to incentivise motorists to make improvements to air quality. The council's residential parking zones had been implemented at a time when emissions-based permit charging was in its infancy. Subsequently many London boroughs have introduced some form of emission-based permit charging and are finding this to be an effective tool in reducing vehicle emissions by influencing behavioural change and to help improve air quality. The proposed introduction of emission-based parking permit charges is therefore similar to those already operating in many London boroughs.

The council has undertaken two distinct public engagement phases; the first in the spring of 2019 and the second in March 2020. The initial phase consultation results showed two-thirds of residents wanted measures adopted to improve air quality and reduce car use however the second consultation did not indicate such a clear majority for the implementation of an increase in emission-based parking permit charges.

An analysis and evaluation of the positive and negative impacts from the new charges concluded that the reasons for introducing emission-based parking charges outweigh the reasons for not implementing them.

The council has considered the concerns that may arise from the proposed introduction of emissions-based parking permit charges when the economy is suffering due to the outbreak of Covid-19 and it is for this reason the implementation of these proposals would not be introduced until January 2021, which would enable residents / businesses additional time to make alternative travel arrangements.

The council has considered the concerns that may arise from the proposed introduction of emissions-based parking permit charges when the economy is suffering due to the outbreak of Covid-19 and has agreed to defer the introduction of the new charging regime until January 2020, so as to allow for a period of economic recovery and for residents to have adequate advance notice of the new charges coming into effect.

The Blackwall Tunnel Extension (sic – actually the Silvertown Tunnel) is a TfL project which was opposed by the Council at all stages of its planning process. City Airport is a national airport with Mayor of London planning consent, which happens to be in Newham, but contributes less to Borough air quality issues than the A13.

It is therefore recommended the objections be over-ruled and the introduction of emissions based

A.8 1 Other objection was raised in relation to permit issue

Ellen Aish - I would like to object to the visitor permits becoming paperless.

I am 71 and not internet minded and if I have a visitor turn up while my daughter is out or away on holiday, how do I go about getting them a visitor permit? Will there be a pay by phone option? I know of several neighbours and friends in Newham who do not have access to the internet so what do they do?

Also at the moment when my son and his family come to stay, I put a paper permit in after 6.30pm at night for the following day so that I don't have to be up remembering to do so at 8am that morning. If these permits are to go paperless, will I still be able to activate one the night before for the following day?

I would like more information on how these paperless visitor permits will operate.

Officers Response: Parking Enforcement deals with the operational process for the proposed Virtual Permit system but it has been confirmed that any user unable to access the system due to lack of availability of an internet system will be able to request a permit either over the phone or by visiting one of the libraries within the borough.

The council has considered the concerns raised and recommends the above objection be over-ruled and the introduction of emissions based parking permit charges be progressed.

A.9 Other objections raised but no details provided:

The council also received 7 objections where no details have been provided as to the reason the objection was made. In line with the requirements of the Traffic order Procedures Regulations 1996 the council is unable uphold these objections.

Appendix B

Statement of Reasons

The following Statement of Reasons for proposing to make the traffic order/s is recommended for approval:

- 1. Newham is suffering an air quality emergency, with recent British Heart Foundation data showing the borough to be the most polluted in the UK, with living in Newham the equivalent of smoking 159 cigarettes a year.
- Newham residents are exposed to more high levels of toxic pollution caused by vehicles causing the highest rate of deaths in England - that's 96 people dying prematurely each year.
- 3. Newham has the highest number of children admitted to hospital due to asthmarelated conditions.
- 4. Local authorities are required to regularly review their parking policies and procedures and to have due regard for local, regional and national policies for modal shift towards more sustainable and less polluting modes of transportation.
- 5. The proposed revision to the Newham parking policies and the adoption of an emissions-based permit system is a response to the earlier consultation and aims to influence a shift towards less polluting modes of transport in Newham with the wider objective of improving air quality which is the worst in London.
- A Cabinet Report approved in February 2020 authorised public consultation about changes to the Council's Parking Policy and Procedures to respond to the air quality challenge in the Borough, as motor traffic is a significant contributor to our poor air quality.
- 7. An Air Quality Action Plan has been produced as part of our legal duty to London's Local Air Quality Management strategy. It outlines the actions we will take to improve air quality in Newham up to 2024
- 8. The Council's existing Parking Policy and Procedures were implemented at a time when emissions-based permit charging was in its infancy. Subsequently many London boroughs have introduced some form of emissions-based permit charging and are finding the policy to be an effective tool in reducing vehicle emissions by influencing behavioural change and to help improve air quality. The proposed Newham Parking Policy and Procedures document includes the introduction of emissions-based parking charges similar to those already operating in many London boroughs.
- Public consultation carried out in 2019 showed a majority of Newham residents wanting a reduction in car use and measures introduced to help improve the poor air quality in the Borough.
- 10. The proposed changes will not affect electric or ultra-low emission vehicle users as permits for the first such vehicle will remain free. Higher charges will only apply for more polluting vehicles.
- 11. The proposals accord with wider policy objectives for reducing traffic and improving air quality in London and are broadly in line with the majority of other London boroughs who already operate emissions-based permits. The proposed emissions-charges in Newham are fair and amongst the lowest in London and offer free permits for the least polluting vehicles.