

Key Decision Report

Decision maker and date of Leadership Team meeting or (in the case of individual Lead Member or Executive Director decisions) the earliest date the decision will be taken	Councillor Cem Kemahli Lead Member for the Environment Date of report: 28 September 2020 Date of decision (i.e. not before): 15 November 2020	 THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA
Forward Plan ref:	05520/19/E/A	
Report title	REVIEW OF RESIDENT PARKING PERMIT STRUCTURE	
Reporting officer	Amanda Reid, Director of Planning and Place	
Key decision	Yes	
Access to information classification	Public	
Wards	All wards	

1. EXECUTIVE SUMMARY

- 1.1. This report recommends that the Council moves from a resident parking permit structure with seven price bands to one which is more directly related to the CO₂ emissions of the vehicle. This type of pricing for residents' parking permits would be a first for the UK. The new proposed permit structure is outlined in Section 5 of this report.

2. RECOMMENDATIONS

- 2.1. The Lead member is recommended to:
- 2.1.1. introduce a new resident parking permit structure, outlined in Section 5, from 1 April 2021, in order to provide a greater incentive for residents to choose cleaner vehicles, particularly electric vehicles, which will support the Council's efforts in tackling air pollution and climate change; and,
 - 2.1.2. review the resident parking permit charges every year as part of the Council's annual review of fees and charges to ensure that they continue to

support the Borough's transport policy objectives as the composition of the resident vehicle fleet evolves; and,

2.1.3. authorise the Director for Transport and Highways to amend the Council's Traffic Orders to reflect the proposals outlined in Section 5.

3. REASONS FOR DECISION

- 3.1. The Council is committed to improving air quality and reducing carbon emissions in the Borough in accordance with the Council's Air Quality and Climate Change Action Plan 2016-2021.
- 3.2. Currently there are around 700 fully electric vehicles with residents' parking permits and this number is increasing gradually year-on-year. The Council is committed to encouraging the uptake of electric vehicles and supports this by installing charging points in residential streets. At present nearly 90 per cent of residential properties are within 200 metres of a charging point and there is a future ambition to bring this down to 100 metres.
- 3.3. Emission-based charging for residents' parking permits, as proposed in Section 5 of this report, should encourage residents to buy the cleanest vehicles. In particular, it would provide a greater incentive to residents to switch to ultra-low emission vehicles, such as electric vehicles, which are not only cheaper to run but aid the Council's ambitions for greening the Borough.

4. BACKGROUND

- 4.1 The Royal Borough suffers from poor air quality, and the whole of the Borough has been designated an Air Quality Management Area since 2000. Air quality and climate change have been priorities for the Council for some time and they are addressed in a combined Air Quality and Climate Change Action Plan (AQCCAP).
- 4.2. In October 2019, the Council adopted the World Health Organisation's (WHO) air quality values and declared a climate emergency. As part of this declaration, the Council announced that it is adopting two targets:
 - The Council's operations and buildings to be net zero carbon by 2030; and,
 - The Borough to be carbon neutral by 2040.
- 4.3. The Council's Climate Change and Air Quality Action Plan commits the Council to taking action to reduce emissions of pollutants that are harmful to health and to reducing transport-related emissions of carbon dioxide. Section 5 of the Climate Change and Air Quality Action Plan has a specific objectives to, "*Use the Council's policies to reduce local emissions*" and to "*Increase take-up of less polluting vehicles*".

- 4.4. According to the latest figures published in June 2020 by the Department of Business, Energy and Industrial Strategy (BEIS) for the year 2018, the transport sector remains the third largest source of CO₂ emissions in Kensington and Chelsea, at 19 per cent of total carbon emissions.
- 4.5. The 2018 CO₂ emissions from vehicles (including freight and passenger transport and both private and business purposes) on all roads in the Borough decreased by 7 per cent since 2017 and by 29 per cent since 2005.
- 4.6. Table 1 provides information from BEIS which shows the New European Driving Cycle (NEDC) CO₂ standards, which is used to approve new passenger cars.

Table 1: 2001-2017 Average CO₂ emissions for cars by engine size based on data from BEIS

Vehicle Type	Engine size	Size of the car	NEDC g of CO ₂ per km
Petrol Car	< 1.4 litre	Small	127
	1.4 - 2.0 litre	Medium	165
	> 2.0 litre	Large	249
Average Petrol Car		All	154
Diesel Car	<1.7 litre	Small	111
	1.7 - 2.0 litre	Medium	139
	2.0 litre	Large	172
Average Diesel Car		All	140

- 4.7. Electric vehicles create no tailpipe emissions, which makes them better for the environment over their lifetime than the conventional combustion engine. The recent introduction by Transport for London (TfL) of the Ultra Low Emission Zone (ULEZ) in the Congestion Charging Zone should deliver some improvements to air quality in the Borough, as most drivers who travel frequently to the ULEZ area are likely to have upgraded any non-compliant vehicles to meet the ULEZ standards. These are Petrol Euro 4 (generally vehicles first registered after 2005) and Diesel Euro 6 (generally vehicles first registered after September 2015). The ULEZ will be extended to cover the Borough in October 2021 but it does not directly address CO₂ emissions. Similarly, the Government's requirement that all new cars must be electric will not come into effect until 2040. The Mayor of London has also recently announced that changes to the existing Low Emission Zone that were due to take effect this year will be delayed, to give businesses more time to prepare for them.
- 4.8. Electric vehicles produce lower emissions that contribute to air pollution and climate change than conventional petrol and diesel vehicles. Whilst electric cars have zero tailpipe (or tank-to-wheel) emissions, they still have upstream emissions from manufacturing the battery and from electricity generation. But analysis of full lifecycle CO₂ assessments show that on average battery electric vehicles emit less CO₂ over their lifetime than diesel. Scientists from the universities of Exeter, Nijmegen and Cambridge conducted lifecycle assessments that showed that even

where electricity generation still involves substantial amounts of fossil fuel, there was a CO₂ saving over conventional cars and fossil fuel heating.

- 4.9. Diesel vehicles contribute towards poor air quality as they emit more tailpipe emissions than petrol vehicles. When compared to petrol cars with a catalytic convertor, diesel vehicles have higher emissions of nitrogen oxides (NO_x) and particulate matter. In June 2012, the International Agency for Research on Cancer (IARC) confirmed that emissions from diesel vehicles are carcinogenic. Oxides of nitrogen combine with ozone to form nitrogen dioxide (NO₂), which even with short term exposure can cause general irritation to the airways and can increase the chance of respiratory infection and impaired lung function. Long term exposure can affect lung function and respiratory systems. Exposure to NO₂ can exacerbate the symptoms of those already suffering with lung or heart conditions. Particulates can cause respiratory and cardiovascular health impacts.
- 4.10. The Council has a policy of discouraging diesel vehicles by charging an extra £47 for a 12-month residents' parking permit, for all non-Euro 6 diesel vehicles. A diesel surcharge has been in place since 2008. All cars registered on, or after, 1 September 2015 meet the Euro 6 standard.
- 4.11. The Council issues around 6,000 more permits to park in residents' parking spaces than it has residents' parking space available. To discourage households from owning multiple vehicles, the Council charges a second and subsequent permit charge of £78 for a 12-month permit. This surcharge has also been in place since 2008.
- 4.12. Table 2 provides a summary of the 2020/21 prices for residents' parking permits.

Table 2: Resident parking permit pricing structure 2020/21

Permit Band	Number of permits (March 2020)	Annual price 2020/21
Band 1 - Electric vehicles	708	£90
Band 1 - up to 100 g/km (excluding EVs)	2,530	£90
Band 2 - 101-120 g/km	5,416	£119
Band 3 - 121-150 g/km	7,877	£138
Band 4 - 151-165 g/km	3,555	£153
Band 5 - 166-185 g/km	3,817	£169
Band 6 – 186 – 225 g/km and vehicles over 225 g/km registered between 01/03/2001 and 22/03/2006	5,267	£183
Band 7 – over 225 g/km and registered from 23/03/2006	2,637	£242
1549cc and under (pre 1 March 2001)	501	£138
Over 1549cc (pre 1 March 2001)	1,439	£183
All permits	33,747	
Diesel surcharge (pre Euro 6)	5,776	£47
Subsequent permit	6,035	£78
Motorcycle permits		
Combined (residents' and motorcycle bays)	477	£119
Combined (Advanced rider discount)	5	£100
Motorcycle permit bays only	181	£0

4.13. Table 2 shows that pre-Euro 6 diesel vehicles still represent over 17 per cent of all residents' cars with resident permits. While this is a lower percentage than was the case in 2011 (which peaked at 26 per cent), the Council wishes to reduce still further the number of diesel cars in the resident fleet to improve air quality and protect the health of residents.

4.14. Table 3 shows that the distribution of vehicles which cause more pollution is not evenly spread across the Borough¹. In general, residents' vehicles in the south of the Borough emit more CO₂ than those in the north of the Borough and are also more likely to be diesel.

¹ Based on February 2020 resident permit data

Table 3: Average CO₂ (g/km) and number of diesel vehicles per ward

Ward	Average of CO₂ (g/km)	Number of diesels (excl. Euro 6)	Number of diesels (incl. Euro 6)
Abingdon	170	350	548
Brompton and Hans Town	175	409	703
Campden	166	407	649
Chelsea Riverside	162	342	544
Colville	154	320	492
Courtfield	168	369	582
Dalgarno	147	225	323
Earl's Court	159	310	455
Golborne	146	193	280
Holland	164	389	572
Norland	164	337	473
Notting Dale	146	246	365
Pembridge	163	218	336
Queen's Gate	173	359	565
Redcliffe	166	387	583
Royal Hospital	167	472	752
St Helen's	153	277	390
Stanley	165	404	661
Total	163	6,014	9,273

5. OPTIONS, ANALYSIS AND PROPOSALS

- 5.1. The Council wishes to simplify the current permit banding system and more directly relate charges to a vehicle's official CO₂ emissions. Table 4 outlines the proposed resident parking permit charges based on CO₂ emissions and 2021/22 prices. This type of pricing for residents' parking permits would be a first for the UK. It would mean that residents would see a direct benefit for every gram of CO₂ that they can avoid when choosing a vehicle and would also help to raise residents' awareness of their current vehicle's official CO₂ rating. It would give a strong incentive to residents to choose ultra low emission vehicles, such as an electric vehicle, potentially saving up to £221 (petrol) to £268 (diesel) a year² by switching to an electric equivalent of their current car.

² based on 2020/21 prices

- 5.2. The prices in Table 4 below and in the rest of this section allow for an inflationary increase of [1.9] per cent from the current 2020/21 prices.

Table 4: Proposed residents' car parking permit charges based on 2021/22 prices

		3 Months	6 Months	12 Months
Base cost of a permit (this would be payable regardless of the type of permit or vehicle and is charged to cover the cost to the Council for issuing a permit which is the same regardless of the length of the permit)		£21	£21	£21
Band 1	Fully electric car or motorcycle (these have zero emissions so will be the same price as the base permit price)	£0	£0	£0
Band 2	Price per CO ₂ g/km (this will be added to the cost of the base permit price)	£0.24 per CO ₂ g/km	£0.48 per CO ₂ g/km	£0.96 per CO ₂ g/km
Diesel Surcharge (pre-Euro 6)		£15	£30	£60

- 5.3. Officers propose that the maximum CO₂ g/km used to generate the cost payable for the "Band 2" element in Table 4, i.e. before any surcharges are applied, be capped at 250 g/km in 2021/22, 300 g/km in 2022/23 and 350 g/km in 2023/24. From 2024/25 onwards there would be no cap on the maximum cost of a permit.
- 5.4. Table 5 provides examples of how the new proposed resident parking permit charges would affect residents who own the five most popular petrol and diesel cars in the Borough and an example electric vehicle and hybrid vehicle. The actual CO₂ rating may be higher or lower than the examples shown based on the age of the vehicle, additional features and fuel type. Vehicles registered in 2014 were selected for comparison purposes.

Table 5: Examples of how the proposed resident permit charge would be applied to the five most popular petrol and diesel cars in the Borough (based on a 2014 number plate) and an example electric vehicle and example hybrid vehicles

Fuel type	Make and Model	CO₂ g/km	2020/21 annual charge	2021/22 annual charge
Electric	BMW i3 (0cc)	0	£90	£21.00
Petrol Hybrid	Range Rover Sport (1997cc)	71	£90	£89.16
Diesel Hybrid	Mercedes C Class (2143cc)	95	£137	£172.20
Petrol	VW Golf (1395cc)	116	£119	£132.36
Diesel	VW Golf (1968cc)	119	£166	£195.24
Petrol	Mini Cooper (1998cc)	125	£138	£141.00
Diesel	Mini Cooper (1995cc)	149	£185	£224.04
Petrol	VW Polo (1390cc)	134	£138	£149.64
Diesel	BMW 3 series (2993cc)	135	£185	£210.60
Petrol	BMW 3 series (2979cc)	179	£169	£192.84
Diesel	Range Rover (2993c)	199	£230	£272.04

- 5.5. Officers have extracted the CO₂ g/km based on the vehicle registration details held on the resident permit database in February 2020. This extract suggests that 2,342 vehicles are above 250 g/km, 826 vehicles are above 300 g/km, 351 were above 350 g/km and 81 were above 400 g/km with only 1 above 500 g/km.
- 5.6. The increase in the annual diesel surcharge from £47 to £60, would mean that any non-Euro 6 diesel vehicle owners would pay an additional £13 a year (although allowing for inflation, this reduces to £12 extra).
- 5.7. Officers expect that, assuming an inflationary increase of [1.9] per cent in 2021/22:
- the average electric vehicle or hybrid vehicle (with CO₂ emissions of up to 100 g/km) owner would pay 77 per cent less for their permit than the current cost of their existing permit; and,
 - the average petrol vehicle owner would pay 6 per cent more for their permit than the current cost of their existing permit; and,

- the average non-Euro 6 diesel vehicle owner would pay 11 per cent more for their permit than the current cost of their existing permit.
- 5.8. Officers propose that the charge for electric motorcycles mirrors that for electric cars so an annual Combined Electric Motorcycle Permit (to park in motorcycle and resident permit bays) would cost the base permit price, i.e. £21. To simplify the system, officers also propose that the Council discontinues applying a discount for holders of an Advanced Rider Training Certificate as only five residents are taking advantage of this discount and the cost of amending the system for just five residents cannot be justified.
- 5.9. Officers propose that the cost of a:
- Combined motorcycle (allowing parking in a residents' bay and motorcycle permit bay) permit be set to £24 excluding the base permit price (i.e. £45 including the base permit price); and,
 - Permit for parking in resident permit motorcycle bays only be kept as free of charge.
- 5.10. Officers propose that all three-month permits be charged at 25 per cent of the annual permit charge (excluding the base permit price) and that all six-month permits be charged at 50 per cent of the annual permit charge (excluding the base permit price). The standard £21 base permit price would then be added to these costs to get the total cost of the permit. This cost is payable for all permits, with the exception of Motorcycle Bay only permits, and is regardless of the type of permit or vehicle and is charged to cover the cost to the Council for issuing a permit which is the same regardless of the length of the permit.
- 5.11. Officers propose that charges for all nine-month permits continue to be based on the difference in price between a 12-month permit and a three-month permit. As is currently the case, residents would not be able to opt for a nine-month permit but may obtain one if requested following purchase of a three-month permit (for example, if a three-month permit is issued whilst documents are sent to the DVLA).
- 5.12. To simplify the system, officers propose that the Council does not offer weekend only permits any more as only two residents are currently eligible for this permit and the cost of amending the system for just two residents cannot be justified.
- 5.13. A one-month temporary permit would cost £41 and can only be issued by customer service staff and not requested by residents.
- 5.14. Officers propose that the following annual permit charges be adjusted to reflect the base permit price so that the overall price of the annual permit remains as it currently is. This would mean that, *excluding the base permit price*, the cost of the following annual permits would be:
- Unknown emissions for a car or van (Engine size not over 1549cc) = £120 plus base permit price

- Unknown emissions for a car or van (Engine size over 1549cc) = £166 plus base permit price
- 5.15. In broad terms, based on February 2020 permit numbers, officers expect that, excluding the subsequent permit surcharges and assuming an inflationary increase of [1.9] per cent in 2021/22:
- 1,942 residents would pay between £26 and £71 less than the current cost of their existing permit; and
 - 2,034 residents would pay up to £25 less than the current cost of their existing permit; and
 - 2,283 residents would pay the same as the current cost of their existing permit; and
 - 20,484 residents would pay up to £25 more than the current cost of their existing permit; and
 - 5,452 residents would pay between £26 and £50 more than the current cost of their existing permit; and
 - 827 residents would pay over £50 more than the current cost. Because of the capping system, the most that any of these residents would pay in 2021/22 would be £86 more than the current cost of their existing permit.
- 5.16. Officers propose that the cost of the second and subsequent (car or van) residents' permit surcharge³ be set to £80.
- 5.17. Officers propose that the new resident parking permit structure described in Section 5 be introduced from 1 April 2021.
- 5.18. Officers propose that the diesel surcharge be increased at a rate above the general rate of inflation from 2022/23 onwards to encourage residents to choose petrol or electric vehicles which have less harmful health impacts.
- 5.19. Officers propose that the resident parking permit charges be reviewed every year as part of the Council's annual review of fees and charges to ensure that they continue to support our transport policy objectives as the composition of the resident vehicle fleet evolves.
- 5.20. Officers propose that the annual price per CO₂ g/km is always divisible by four to enable easy calculation of a three-month permit.
- 5.21. Officers propose that the Director for Transport and Highways amends the Council's traffic orders to reflect the proposals above.

³ This charge is applicable to doctors' surgeries as well as to households within the borough

5.22. The changes outlined in this section would be compatible with a virtual permit system, should the Council wish to move to such a system.

5.23. The options are:

- (i) Agree the changes in the resident parking permit structure outlined in Section 5 (recommended) in order to provide a greater incentive for residents to choose cleaner vehicles, particularly electric vehicles; or,
- (ii) Do not agree the recommendations outlined in Section 5.

6. CONSULTATION AND COMMUNITY ENGAGEMENT

6.1. This report will be circulated to Residents Associations and the Environment Select Committee for comment in September and October 2020 before the decision is proposed.

6.2. There will be statutory consultation associated with amending the traffic management order to allow for these changes in charges. A notice will be placed in the London Gazette and the West London Gazette which circulates in Kensington and Chelsea notifying residents of the change.

6.3. Officers will raise awareness of the changes using the Council's publications and media channels and by writing to all existing permit holders when the Key Decision Report is implemented to provide more time for residents to change to a cleaner vehicle before their permit comes up for renewal.

7. LEGAL IMPLICATIONS

7.1. The Council's current traffic orders would need to be amended to reflect the new charging regime in accordance with the provisions of the Road Traffic Regulation Act 1984. Statutory consultation in accordance with the provisions of the Local Authorities Traffic Order (Procedure) (England and Wales) Regulations 1996 will be conducted, the draft order will be advertised allowing for objections, and the rest of the procedural steps will be followed that are necessary for the making of such orders. A notice will be placed in the London Gazette and the West London Gazette which circulates in Kensington and Chelsea notifying residents of the change. The Council is obliged to take a balanced approach throughout its decision-making process when seeking to implement the proposed fee charges.

7.2. Section 12 of the Health and Social Care Act 2012 places a duty on the Council to take such steps as it considers appropriate to improve the health of its people in the area. The reduction of vehicle emissions (which is adverse to public health and the environment) will help to ensure that the Council meets this duty together with the ongoing commitment to improve air quality and reduce carbon emissions within

the Royal Borough under its Air Quality and Climate Change Action Plan programme.

8. FINANCIAL, PROPERTY, IT AND ANY OTHER RESOURCES IMPLICATIONS

- 8.1. While decisions on parking policy are not made with a view to the generation of income, it is reasonable and diligent to assess the financial implications of new policies at the time of decision making.
- 8.2. The overarching aim is to make vehicle users more aware of their CO₂ emissions when making choices about vehicle use and is linked to the Council's Carbon Emergency declaration in October 2019 which stated a commitment for the Council to be Carbon Neutral by 2030 and to support the wider community to enable the borough to be Carbon Neutral by 2040.
- 8.3. The long-term impact of this decision on CO₂ emissions has not been modelled though the intent is clear and hypothesis rational. Finance will work with the Parking and Greener Living teams to model impact scenarios and utilise data emerging once this permit structure is introduced to inform this, to ensure policy objectives are being delivered.
- 8.4. There is a potential short-term upturn and longer-term financial risk of linking the parking permit structure to CO₂ as outlined in the report. Parking revenue is restricted in use to transport system and environmental improvements and is, for example, used to fund the Council's contribution towards the Freedom Pass scheme which provides free transport for older and disabled residents, highway maintenance and highway improvement schemes which are resident priorities as outlined in the Council Plan. The resident permit structure is kept under constant review to ensure the appropriate balance of delivering parking policy and wider objectives and as such may be subject to further change in the future.
- 8.5. The cost of making changes to the resident parking permit system to accommodate the changes outlined in Section 5 is £47,250. This cost can be met from existing parking budgets.
- 8.6. The current residents' parking permit system does not record a vehicle's exact CO₂ g/km but just the band that a vehicle is in. This makes it difficult to make accurate forecasts of the financial impact of the changes proposed in this report. Officers' best estimate is that the CO₂ element of the proposal might generate an additional £246k. In addition, officers estimate that the increase in the diesel surcharge will increase permit income by around £69k and the reduction in the price of the combined motorcycle permit will result in a loss of income of £37k. The potential net effect of these changes would result in an increase in income of £278k. Clearly, income from the diesels surcharge is likely to reduce as the expansion of the ULEZ in October 2021 draws closer. Similarly, additional revenue attributed to the CO₂ ratings is expected to fall year-on-year as the number of electric vehicles increases. Income from subsequent permits may also reduce if households sell

their second or third vehicle due to change in behaviour following the COVID-19 pandemic, especially for the first year of the change in permit structure.

- 8.7. The cost of the traffic order notices is likely to be in the region of around £600. This cost can be met from existing budgets.
- 8.8. [The inflationary increase of 1.9 per cent has been used for illustrative purposes to aid the consultation. The inflationary increase for 2021/22 will be set just before this decision is proposed when more information on the likely inflationary rate for 2021/22 will be available.]
- 8.9. The 1 April 2021 implementation date will be subject to operational mobilisation, public consultation, and may be impacted by the emerging COVID-19 situation but current expectations are that costs will be incurred in 20/21. In the short-term there is limited financial risk to the introduction of this policy though this will be kept under continual review to inform future decisions.

9. HUMAN RESOURCES IMPLICATIONS

- 9.1. This report does not have any Human Resources implications.

10. EQUALITIES IMPLICATIONS

- 10.1. The Council has had regard to its Public Sector Equality Duty contained under Section 149 of the Equality Act 2010 and which places a general equality duty on the Council when exercising its functions, and the making of such decisions (in this case parking) to have regard to the need to eliminate discrimination, harassment, victimisation, or other prohibited conduct; advance of equality of opportunity and foster good relations between persons who share a relevant protected characteristic and those who do not share it. The relevant characteristics are age, disability, gender assignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The duty also applies to marriage and civil partnership but only in relation to the elimination of discrimination.
- 10.2. Although electric vehicles are much more expensive than petrol vehicles, due to the lag in technology, and so are out of the reach of those in the median gross household income bracket, there is no reason to believe that any protected group has a greater likelihood of owning a vehicle which has high CO₂ emissions or a large car that might be more likely to have high CO₂ emissions or using a diesel vehicle (or any other type of fuel). It is possible that vehicles which are adapted to carry wheelchairs may have a higher CO₂ emissions but officers do not have any data on the age of such vehicles or their CO₂ emissions. However, it is very likely that any residents who own such a vehicle would also have a purple badge, issued free of charge, which would mean that they would not need to apply for a residents' parking permit.

OTHER CONSIDERATIONS

Risk Management - none

Health and Wellbeing - none

Health and Safety Implications - none

Crime and Disorder - none

Human Rights - none

Privacy Impact Assessment - none

Impact on the Environment – The proposed changes to the resident parking permit structure should encourage residents to buy and use the cleanest vehicles. It would also encourage the take-up of electric vehicles by residents by providing a discount on the permit price for electric vehicles and provide an incentive for residents not to purchase diesel vehicles, thereby improving air pollution and reducing carbon emissions across the borough.

Sustainability and Energy measure issues – The proposed changes align with the Council’s climate emergency motion and net zero carbon targets and air quality standards.

Amanda Reid
Director of Planning and Place

Local Government Act 1972 (as amended) – Background papers used in the preparation of this report

None

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Formal clearance requirements for all key decision reports

Cleared by Finance (officer's initials)	LV
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