



Meeting or Decision Maker:	Cabinet Member for Environment, Sports & Community & Cabinet Member for City Highways
Date:	18 May 2017
Classification:	General Release
Title:	Parking-Related Low Emission Initiatives
Wards Affected:	All Wards
Key Decision:	An entry was included in the Forward Plan of Key Decisions on Wednesday 2 November 2016, enabling a decision to be made from Thursday 1 December 2016
Financial Summary:	The cost of the recommendations contained within the report total £184,050. All costs will be met from the Low Emissions Neighbourhood budget with funding secured from the Mayor of London's Air Quality Fund.
Report of:	Stuart Love, Executive Director for City Management & Communities

1. Executive Summary

- 1.1 Westminster is committed to becoming a greener city and a beacon of how to tackle air pollution.
- 1.2 The Council's parking service will play a key role in this ambition through the implementation of policies and initiatives that support the improvement of air quality.
- 1.3 In July 2016 Westminster City Council was successful in obtaining funding from the Mayor of London's Air Quality Fund to create a Low Emission Neighbourhood (LEN) in Marylebone. The creation of the LEN provides an ideal opportunity to test new initiatives in a controlled and measurable way, thereby informing any decision to roll these out on a citywide basis.
- 1.4 The initiatives include the introduction of an emissions based on-street parking charge, the expansion of on-street electric vehicle charging points, smarter

management of taxi ranks through the use of optical sensors, and the deployment of dedicated Air Quality Champions to support tackling the problem of engine idling.

1.5 This report sets out how the parking service intends to implement these initiatives.

2. Recommendations

2.1 That the Cabinet Member for City Highways approves the following:

- The introduction of a trial 50% surcharge for all diesel vehicles paying to park within F Zone (Hyde Park, Marylebone and Fitzrovia) as contained with section 5.1 of this report.
- The publication of Variation Notices issued under Section 46A of the Road Traffic Regulation Act ("The 1984 Act"), in order to give effect to the recommended change above.
- The expansion of on-street electric charging provision as contained within section 5.2 of this report.
- The extension of the optical sensor technology proof of concept in taxi ranks informing taxi drivers of real time availability as contained with section 5.3 of this report.
- The deployment of Air Quality Champions to support the wider anti idling work of the parking services team and wider council as contained within section 5.4 of this report.
- That each of the above is implemented from May 2017 or at the earliest opportunity thereafter, with the exception of the diesel surcharge which will be implemented on Monday 5 June 2017.

2.2 That the Cabinet Member for Environment, Sports & Community approves the sum of £184,050 from the LEN budget to facilitate the initiatives referred to in this report.

3. Reasons for Decision

3.1 The rationale for each proposal is outlined in detail in section 5 below, but can collectively be summarised as follows:

- To reduce vehicle emission pollutants in the City and encourage model shift to more sustainable means of transport.
- To enable provision of additional electric vehicle charging infrastructure.
- To discourage unnecessary car and kerbside use.
- To make a difference to the quality of air within the City.
- To understand customer travel patterns and to foster behaviour change.

- To discourage the highest polluting vehicles from entering the City.

4. Background, including Policy Context

- 4.1 Poor air quality has a direct impact upon the health and life expectancy of those who live and work in our cities. It is estimated that 9,400 deaths in London per annum are attributable to poor air quality. The health of London's population and its status as a global city and leading economic and commercial centre are all threatened by the levels of pollution.
- 4.2 Air quality is of increasing resident, business and media interest. Good air quality is a priority for residents and businesses in Westminster with our most recent 'City Survey' indicating air quality to be the issue of most concern to our residents. Business raises the issue of poor air quality with Westminster Council on a regular basis and is supportive of actions to reduce its impacts.
- 4.3 The Council has a statutory responsibility to work to improve poor air quality. The current Air Quality Action Plan (AQAP) was adopted in 2013 and is due to be revised this year, ready for adoption in 2018. The AQAP seeks to reduce pollution from transport and buildings and increase engagement and awareness of air quality issues.
- 4.4 Air quality legislation and regulation in the United Kingdom is largely shaped by a series of directives introduced at European level which are subsequently transposed into UK law. The failure to meet the air quality objectives in a number of UK cities, including London, resulted in the EU's initiation of formal proceedings against the UK in 2014. In addition, Client Earth – a group of activist lawyers – has very recently won its High Court case against the Government over its failure to tackle air pollution across the UK. As a result, the Government's current air quality plans must be reviewed and a more robust plan developed. It is likely, therefore, that we will see a strengthening of national air quality policy.
- 4.5 A key emerging policy theme for air quality management is the transition to a non-diesel economy/fleet – as highlighted by the Mayors of Paris, Madrid, Athens and Mexico City all recently announcing plans to ban diesel vehicles from their cities by 2025. Diesel is considerably more polluting than petrol and the emerging electric vehicle fleet is providing a less polluting and more sustainable alternative to fossil fuel combustion, which makes for a cleaner, healthier city environment. In addition, the recent VW scandal helped raise the public awareness of poor air quality and the poor environmental performance of diesel vehicles.
- 4.6 Air quality played a big role in the recent London Mayoral election. The central London Ultra Low Emission Zone (ULEZ), set to commence operating in 2020, is the most significant London-wide measure aimed at discouraging the use of old vehicles; in particular, older diesel vehicles which are more polluting. For example, petrol cars registered before 2006 and diesel cars registered before September 2015 will have to pay a daily charge to enter London's ULEZ or be issued a penalty. There is also significant action underway to reduce emissions from both bus and taxi fleets and encourage the uptake of electric vehicles. It is also important to bear

in mind that the ULEZ will be operating alongside other traffic/emission management schemes, the Congestion Charge and the London-wide Low Emission Zone (LEZ).

- 4.7 In addition, the Mayor has consulted on an Emissions Surcharge of £10 to apply to older polluting vehicles driving into the Congestion Charge zone from October 2017. This charge would be in addition to the Congestion Charge and would apply to vehicles that do not meet the Euro 4/IV emissions standard. The Mayor has also proposed options for expanding the ULEZ to the North/South circular and tightening vehicle emissions standards across all London.
- 4.8 As indicated, the Mayor has significant scope to implement schemes to reduce emission from vehicles. But, action to improve air quality is needed at all levels of Government if we are to reduce pollution to acceptable levels for health. One of Westminster Council's key regulatory powers which can influence vehicle emissions is the management of parking.
- 4.9 Emissions-based on-street parking charges use the principle of 'the polluter pays' and would charge vehicles according to their emissions for parking in on-street bays.

Marylebone Low Emission Neighbourhood (LEN)

- 4.10 Marylebone is situated among some of London's most polluted roads and the area as a whole suffers from some of the highest levels of air pollution in Europe. Two monitoring stations adjacent to the LEN, Marylebone Road and Oxford Street, measure NO₂ levels in excess of EU health standards. In 2015, annual average concentrations of NO₂ were exceeded at both sites, with Marylebone Road being over twice the health limit (81µg/m³) and Oxford Street over three times the limit (135 µg/m³). In 2015, the hourly mean NO₂ limit was also breached at both sites. In the case of Oxford Street, 200 µg/m³ was exceeded for 1,391 hours, almost 80 times the limit.
- 4.11 The Marylebone LEN is a programme of area-focused, dedicated air quality initiatives which have been developed in collaboration with local stakeholders including the local Councillors for Marylebone High Street and Bryanston and Dorset Square wards; the Portman and Howard de Walden Estates; three Business Improvement Districts (BIDs) including Baker Street Quarter Partnership, New West End Company and Marble Arch BID; the Marylebone Association, St Marylebone Society, and the Marylebone Neighbourhood Forum all working side by side with Westminster City Council. The proposed diesel surcharge parking scheme was developed in partnership with the LEN stakeholders for piloting in the Marylebone LEN area and the scheme has strong support from the stakeholders.

Emissions levels and sources

- 4.12 The charts below draw on the data of the latest London Atmospheric Emissions Inventory¹ and show the concentration of NO₂ across Westminster in 2013 (the

¹ London Atmospheric Emissions Inventory 2013, Mayor of London 2015 (<https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory-2013>)

most current air modelling maps available from TfL) and also show the sources of NOx pollution in Westminster for 2013 and predicted for 2020. As can be seen, diesel cars in Westminster account for 7.2% of total NOx emission in 2013 with petrol cars accounting for only 3.5% and buses accounting for the largest overall contribution.

4.13 As can be seen, measures to address emissions from diesel and incentivise the uptake of cleaner, low emission vehicles will be effective in targeting the more significant sources of pollution.

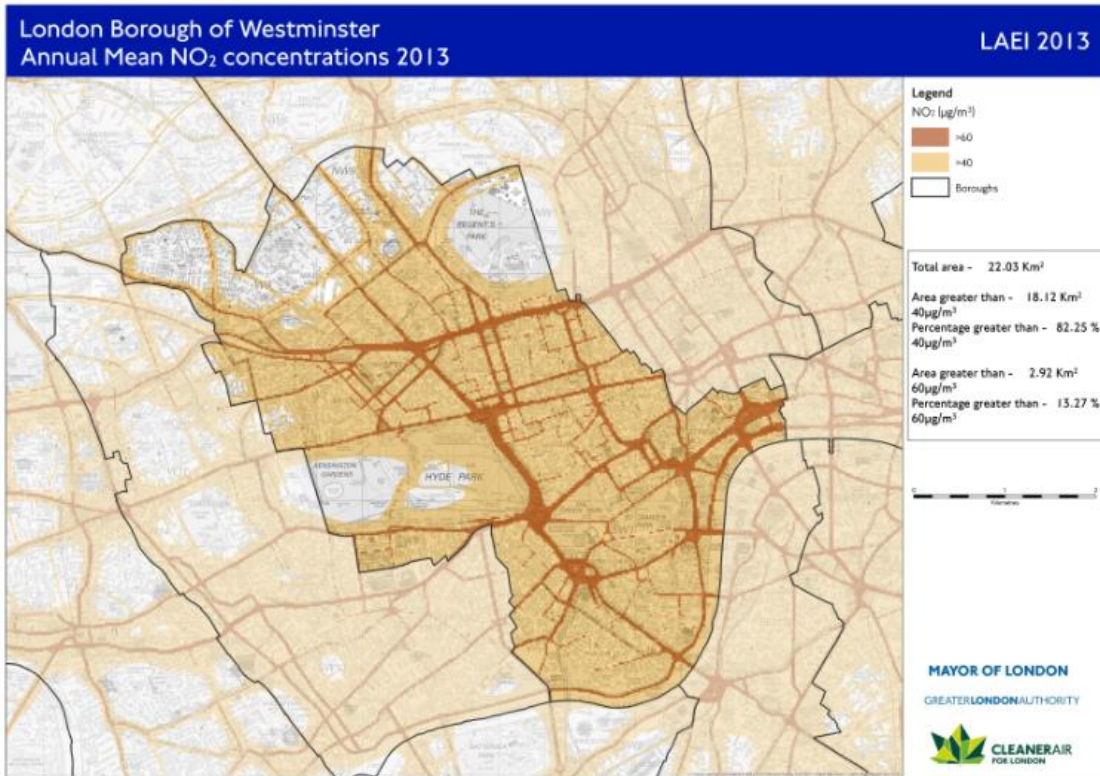
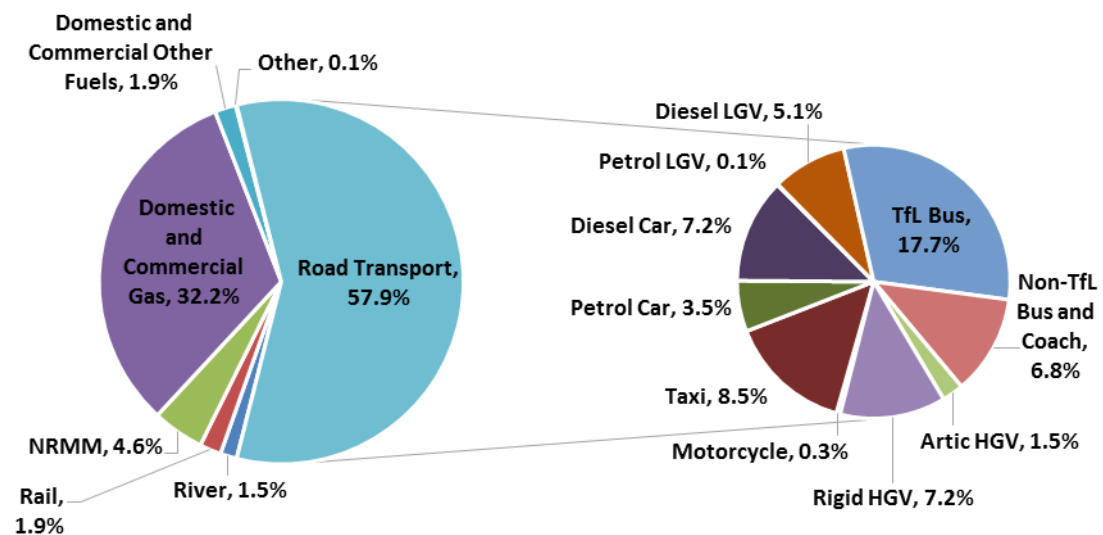


Figure – NO₂ exceedance concentration map



5. Proposals

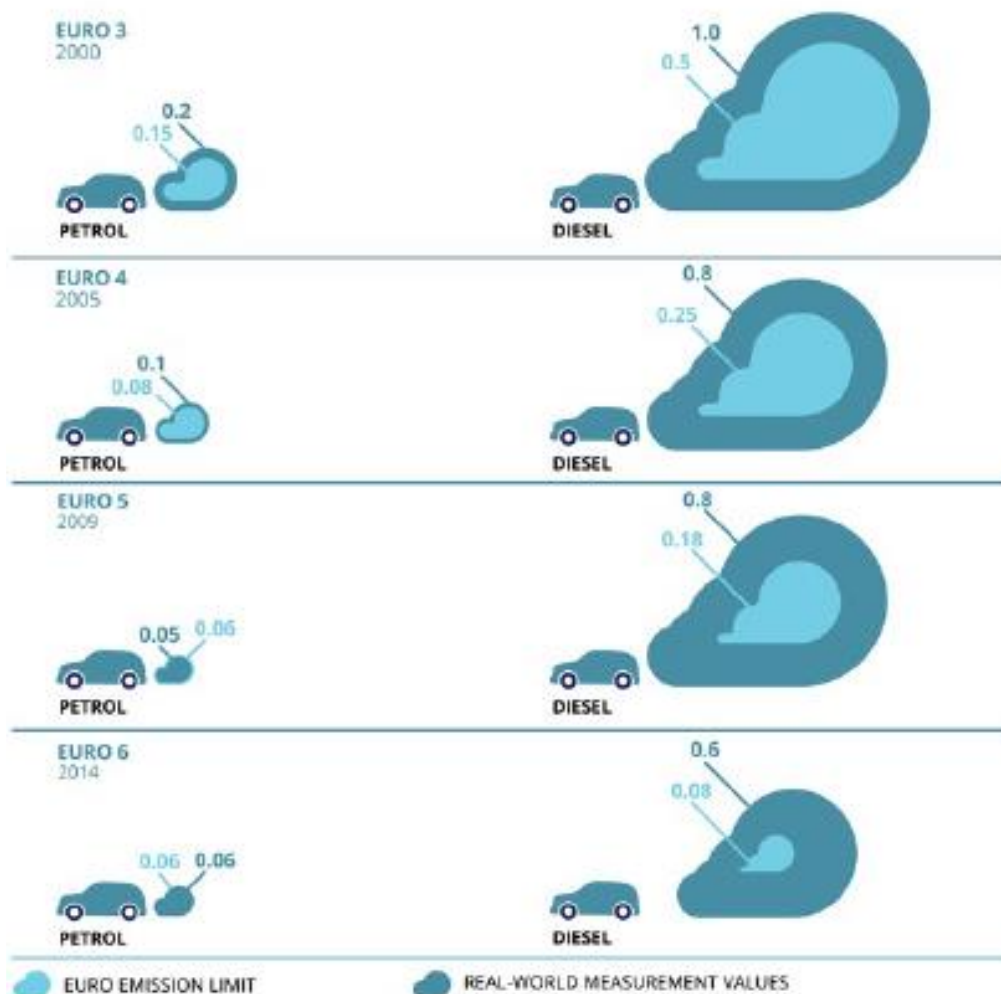
The following changes are proposed

5.1 **The introduction of a 50% surcharge for all diesel vehicles paying to Park in F zone which will increase the hourly tariff from £4.90 to £7.35 an hour for diesel vehicles**

5.1.1 Euro Standards classification is the most appropriate means of classifying vehicle emissions. The European emission standards set a maximum concentration standard for pollution emitted from new vehicles sold in Europe and have become gradually more stringent. The purpose of the Euro emissions standards is to reduce pollution and many European cities use these Euro standards to keep the older, more polluting, vehicles out of their cities.

5.1.2 The info-graphic below gives a comparison of Euro Standards and real world emissions from diesel and petrol cars. As can be seen, emissions standards and real world emissions from diesel cars are much greater than for petrol cars and a parking scheme which reduces the number of diesel cars trips to an area will have a positive impact on local air quality.

Comparison of NO_x emission standards for different Euro classes



Adapted from: ICCT, 2014a; Emicia, 2015

Nitrogen oxide (NO_x) emissions (in g/km)

- 5.1.3 The City Council along with all other local authorities is reliant on DVLA data to operate parking management schemes and its current limitations mean that we cannot utilise Euro Standard data as it is not reliably recorded by the DVLA. For this reason, the operation of a parking scheme based on Euro Standards is not practicable at this point in time and therefore we must rely simply on fuel type.
- 5.1.4 It is therefore proposed to introduce a 50% surcharge for diesel vehicles paying in park in F zone.
- 5.1.5 The 50% level has been proposed as a significant enough increase to deter the heaviest polluting vehicles from parking in F zone. The volume of transactions from diesel vehicles both prior to and post the trial will be collected and the effects closely monitored.
- 5.1.6 As such a policy to deter high polluting vehicles from paying to park has not been introduced previously in the UK the effect of price elasticity on demand is not known at this time and cannot be predicted with any degree of accuracy. Therefore, both

the principle and level of the surcharge will be reviewed three months after its introduction and at three month intervals thereafter. The purpose of the reviews will be to determine the level of change in driver behavior brought about by the surcharge.

- 5.1.7 Whilst the Euro Standard data is not available we are able to obtain 'Year of Manufacture' data from the DVLA. To ensure that Euro 6 compliant and therefore less polluting diesels are not affected by the surcharge it is proposed all vehicles manufactured during 2015 and thereafter be exempt from the surcharge.
- 5.1.8 It is also proposed we exempt diesel vehicles manufactured in 2015 and later due to Government policy having encouraged the purchase of diesel vehicles in recent years, rendering it unfair to penalise motorists who bought such vehicles in good faith.
- 5.1.9 All customers will be made fully aware of the surcharge prior to purchase of a parking session.
- 5.1.10 Where the DVLA returns no fuel type, as in the case of unregistered or foreign vehicles for example, no surcharge can be applied.

5.2 The expansion of on-street electric vehicle (EV) charging provision

- 5.2.1 There are currently 56 on-street EV recharging points across 43 sites in Westminster from three suppliers, Chargemaster, POD Point and Electromotive. These are all currently managed through Source London, by Blue Point London (BPL). In addition to this there are also 25 recharging points available exclusively for the Westminster Car Club.
- 5.2.2 Sales of EVs and plug-in hybrid vehicles (PHEVs) continue to grow. Figures show there were 45,326 in service nationally in 2016, compared to 20,522 vehicles at the start of 2015, a 120% increase; the number of recharging points in Westminster has remained relatively static during this period. The Council's Greener City Action Plan set out a commitment to install a further 20 recharging points by the end of 2018 and implement a dedicated scheme for residents.
- 5.2.3 Officers are seeking approval to grow the network to accommodate current demand and provide the assurance about recharging availability that vehicle owners, who are considering switching to an EV, are looking for. The provision of growth of the network and ongoing maintenance of the infrastructure is being proposed at zero cost to the Council through the strategy below.
- 5.2.4 The initial priority will be to stabilise the existing network in order to ensure that the points are operational and adequately maintained; a common complaint has been that points are too frequently out of service. This will be achieved through new contractual agreements being put in place with multiple operators, which will allow performance to be benchmarked and avoid a situation of complete network failure should one operator fail to deliver a satisfactory service.

- 5.2.5 The new arrangements will mean that the City Council will no longer cover the cost of the electricity used; this will be borne by the operators and passed on to the user via a subscription or pay-as-you-go model. For example, BPL charge a £4 monthly subscription fee plus 3.6p per minute when charging. With Chargemaster, users can sign up as a member for £7.85 per month or pay-as-you-go for 9p per kWh. Officers will pursue discussions with operators about discounted offers for residents.
- 5.2.6 Once the existing network is stable, officers will work with suppliers to obtain planning permission and install new points at new locations across the City. The introduction in April 2017 of the nominal charge for EVs and PHEVs, which allows them to park up to the maximum stay in pay to park bays, will allow officers to measure demand and provide charging points according to the highest areas of demand.
- 5.2.7 In addition to this, officers plan to work with TfL to identify suitable sites for rapid rechargers for taxis, as well talking directly to operators to install rapid rechargers for general public access. Other options are also being considered, including a pilot that will see lamp columns retro-fitted with a recharging point. These new initiatives will initially be piloted in the LEN prior to evaluating their viability for a wider city-wide roll out.
- 5.2.8 There will also be a renewed focus on delivering a dedicated recharging scheme for residents to support a shift to.

5.3 The extension of optical sensor technology for taxi ranks

- 5.3.1 Westminster's taxi ranks are some of the busiest in London. The City Council is actively seeking new solutions to manage its heavily used kerbside space more effectively, and this challenge is at its most acute in the West End. As part of the West End Partnership Taxi group, the City Council, in partnership with stakeholders including the London Taxi Drivers' Association, has started to look at ways in which taxis can make more efficient use of taxi ranks and taxi feeder ranks.
- 5.3.2 A proof of concept of new intelligent optical vehicle occupancy technology was initiated in late 2016 at 32 taxi ranks (c.107 spaces) in the West End of the city. This allowed real-time rank availability data to be published in Westminster's ParkRight application. The project was funded by the DfT, with match funding secured from the TfL LIP fund. The trial helps taxi drivers find available space without the need to circulate to look for a free rank, providing a solution to the problem associated with over supply at busy ranks, as well as contributing to a reduction in congestion and vehicle emissions.
- 5.3.3 The initial proof of concept saw increased compliance with the parking regulations in the limited space available for taxis and freed up kerbside space immediately outside ranks for the improved movement of traffic and pedestrians and other kerbside activities, such as loading.
- 5.3.4 Officers are seeking an approval for an extended trial of this technology and the roll out of real time data through an open source Application Programming Interface (API) to a large number of parking applications.

5.3.5 The extended trial and roll out to applications is intended to prove the technology can assist in directing taxi drivers to an available space more quickly, providing a better service to waiting customers, reducing congestion, reducing emissions and improving safety at the busiest ranks.

5.4 The deployment of dedicated on street Air Quality Champions

5.4.1 Engine idling causes unnecessary air pollution.

5.4.2 Whilst the parking services' marshalling team educates motorists and, where appropriate, enforces against unnecessary vehicle idling by Penalty Charge Notice (PCN), this is only one of a number of tasks they perform in supporting the safe and expedient movement of traffic in the City.

5.4.3 To ensure a greater focus is placed on reducing engine idling, officers are proposing to deploy a small number of dedicated Air Quality Champions to solely focus on this issue. The Air Quality Champions will continue to be supported by the wider Marshalling team.

5.4.4 The Air Quality Champions will be fully trained and empowered to issue PCNs, but their sole focus will be to take action against idling and spread positive air quality messages including engagement with local stakeholders.

5.4.5 It is proposed to trial the deployment of a dedicated team initially within the LEN with further roll out across the City dependent on the success of this trial.

6 Financial Implications

6.1 The cost of implementing the proposed surcharge within F zone via the City Council's current Pay to Park provider: RingGo is £25,000. In addition to the one-off implementation cost there will be an annual licence fee of £14,000 for access to additional DVLA data fields to ensure the charge can be applied correctly. Should the trial prove successful and be rolled-out to other parts of the City then the charge could increase to a maximum level of £86,000 per annum. The cost of the trial would be fully funded from the LEN budget.

6.2 It is difficult to accurately estimate the effects on revenue as the purpose of the surcharge is to deter diesel vehicles from entering and parking in the zone. The surcharge will be clearly separated from the standard parking tariff and reported upon separately within the Parking Places Reserves account.

6.2 The proposed growth of electric charging provision will be provided at zero cost to the Council through the proposed concession agreements and all on-going electricity charges will be paid by the end user.

6.3 The initial funding for the proof of concept of the optical sensors has been provided by the DfT with match funding from the LIP Fund. An extended trial of the service incurs additional licensing, support and maintenance charges. A budget of £86,250 exists within the LEN funding for this purpose which will be utilised to support the extended trial.

- 6.4 The initial plans are to provide three dedicated Air Quality Champions within the LEN area on a rota basis. They will be provided by NSL under Parking Services' People and Resources contract. There will be initial set up costs of around £800 and ongoing costs of around £58,000 based on the current proposed deployment plan. A budget of £67,850 exists within the LEN funding for this purpose. Any additional roll-out of Air Quality Champions in the City would need to be funded from within the current Parking budget or through any revenue generated through the Diesel surcharge above. As it is policy that our Marshals ask any motorist observed actively engine idling to switch off their engine or move on before they begin taking enforcement action, the vast majority of drivers comply with the request. Therefore, there is not expected to be any significant PCN revenue from this initiative to off-set costs.

7. Legal Implications

- 7.1 The Council's authority to operate and set parking charges is defined by statute. Under Section 46 of the 1984 Act, the Council has discretion as to the charges it sets (by means of traffic orders or Notices of Variation of charges under Section 46A). In accordance with Section 55 of the 1984 Act the income the Council receives from on-street parking is placed into the 'Parking Places Reserve Account', which can only be used by the Council for highway improvements and other traffic related measures.

- 7.2 Section 122 of the 1984 Act sets out the considerations which must be taken into account by the Council in exercising its statutory powers, including in relation to parking. In essence section 122 states:

(1) It shall be the duty of every local authority upon whom functions are conferred by or under this Act so to exercise the functions conferred on them by this Act as (so far as is practicable having regard to the matters specified in subsection (2) below) to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway, or, in Scotland the road.

(2) The matters referred to in subsection (1) above as being specified in this subsection are—

(a) The desirability of securing and maintaining reasonable access to premises;

(b) The effect on the amenities of any locally affected and (without prejudice to the generality of this paragraph) the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run

(bb) The strategy prepared under Section 80 of the Environment Act 1995 (national air quality strategy)

(c) The importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles; and

(d) Any other matters appearing to the local authority to be relevant.

- 7.3 In accordance with the Council's statutory responsibility under Section 122, of which sub-sections 2(b) and (bb) are of particular relevance to the Council's proposal to introduce a diesel surcharge for paid-for parking, the Council must have regard to traffic management considerations in the setting of charges. Setting pricing levels to restrain demand and enable a more effective management of the

kerbside for wider transport and environmental benefits consistent with section 122 and the Network Management Duty is a legitimate tool to give effect to that responsibility.

- 7.4 Through the trial of a diesel surcharge the Council aims to reduce the number of diesel vehicles; particularly those manufactured prior to 2015 from paying to park within the LEN and in doing so improve air quality in the area.
- 7.5 The changes proposed would necessitate the publication of Variation Notices in a local newspaper pursuant to Section 46A of the 1984 Act, at least 21 days before the increases are due to come into force. The proposed changes as part of the consultation process will also feature on the Council's website.

8 Staffing Implications

- 8.1 This report has no direct staffing implications for Westminster City Council. The Air Quality champions will be employed by our Parking contractor NSL Limited through the People and Resources contract.

9. Consultation and Communication Implications

- 9.1 Publication of Variation Notices under section 46A of the 1984 Act will be necessary in order to give effect to all the proposed pay-to-park changes. Where such a variation may affect a neighbouring authority, the Council is required by section 25(2) of the Local Authorities Traffic Order (Procedure) (England and Wales) Regulations 1996 to send a draft copy of this Notice to that authority. Under such legislation the Council must give at least 21 days' notice (through publication of the Notice) of the commencement date of any such proposed variation in charges.
- 9.2 Information pertaining to these changes will clearly be advertised on the relevant pages of the Council's website. A communications campaign advising of the charging and policy changes will be undertaken in good time prior to the proposed implementation date(s). Communications will include advance warning notices on the Pay to Park IVR, SMS and App services, advance notice stickers on all Pay to Park signage, as well as media releases.

10. Implementation

- 10.1 To allow time for robust testing and a comprehensive communication plan prior to the change, it is proposed to introduce the diesel surcharge trial from Monday 5 June 2017.
- 10.2 The expansion in EV provision will take place during 2017 when suitable locations have been identified and the relevant permissions sought.
- 10.3 The optical sensor technology has already been installed and the initial proof of concept has been funded until May 2017. It is intended for the extended trial to begin following the expiration of the proof of concept trial.

10.4 It is proposed to deploy the dedicated Air Quality Champions as soon as possible, following appropriate recruitment and training.

11. Other Implications

11.1 See appendix A

If you have any queries about this Report or wish to inspect any of the Background Papers please contact:

Adam Warnes, Head of Parking Services
awarnes@westminster.gov.uk

BACKGROUND PAPERS:

Map of WCC showing parking zones and sub-zones of Westminster

http://transact.westminster.gov.uk/docstores/publications_store/parking/parking_zones_map.pdf

House of Commons Transport Committee report on 'Taxes & Charges on Road Users'

<https://www.publications.parliament.uk/pa/cm200809/cmselect/cmtran/103/103.pdf>

For completion by the **Cabinet Member** for *Environment, Sports & Community*

Declaration of Interest

I have <no interest to declare / to declare an interest> in respect of this report

Signed: _____ Date: _____

NAME: _____

State nature of interest if any

.....

(N.B: If you have an interest you should seek advice as to whether it is appropriate to make a decision in relation to this matter)

For the reasons set out above, I agree the recommendation(s) in the report entitled 'Parking-Related Low Emission Initiatives' and reject any alternative options which are referred to but not recommended.

Signed

Cabinet Member for *Environment, Sports & Community*

Date

If you have any additional comment which you would want actioned in connection with your decision you should discuss this with the report author and then set out your comment below before the report and this pro-forma is returned to the Secretariat for processing.

Additionalcomment:
.....
.....

If you do not wish to approve the recommendations, or wish to make an alternative decision, it is important that you consult the report author, the Head of Legal and Democratic Services, Chief Operating Officer and, if there are resources implications, the Director of Human Resources (or their representatives) so that (1) you can be made aware of any further relevant considerations that you should take into account before making the decision and (2) your reasons for the decision can be properly identified and recorded, as required by law.

Note to Cabinet Member: Your decision will now be published and copied to the Members of the relevant Policy & Scrutiny Committee. If the decision falls within the criteria for call-in, it will not be implemented until five working days have elapsed from publication to allow the Policy and Scrutiny Committee to decide whether it wishes to call the matter in.

For completion by the **Cabinet Member** for *City Highways*

Declaration of Interest

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Signed: _____ Date: _____

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State nature of interest if any

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Other Implications

1. **Resources Implications** – The recommendations of this report may result in a minor increased resource requirement for back office administration and increase back office costs and handling times as a result, especially during the implementation of the Diesel surcharge.
2. **Business Plan Implications** – The recommendations of this report are in accordance with the City Management and Communities Business Plan for 2015-17.
3. **Risk Management Implications** – The proposals contained in this report could present reputational risks to the Council.
4. **Health and Wellbeing Impact Assessment including Health and Safety Implications** - None
5. **Crime and Disorder Implications** - None
6. **Impact on the Environment** – The recommendations of this report align with the Council's wider transport and environmental policies of discouraging unnecessary car use. The recommendations within the report formed a key part of the Council's bid to the Mayor's Air Quality Fund and fit with the Greener City Action plan.
7. **Equalities Implications** – The recommendations of this report present no significant equality implications. An Equalities Impact Assessment will be carried out.
8. **Human Rights Implications** - None
9. **Energy Measure Implications** - None