

Cabinet Member Report

Meeting or Decision Maker:	Cabinet Member for City Management and Air Quality
Date:	06 November 2023
Classification:	General Release
Title:	Parking Fee Structure Review – Approval of Detail
Wards Affected:	All
Policy Context:	This proposal aligns with the Fairer Economy and the Fairer Environment elements of the Fairer Westminster strategy. It will also aid traffic flow and congestion and thus positively affect air quality.
Key Decision:	Key - An entry was included on the list of forthcoming decisions on 1 July 2022, enabling a decision from 1 August 2022.
Financial Summary:	<p>The proposed Parking Fee Structure Review will enable savings of £3.250m within the current Medium Term Financial Plan to be met, and if implemented at the fee levels indicated may generate a further £2.990m savings.</p> <p>Parking Services have an approved capital budget of £0.140m in respect of implementation of this policy.</p>
Report of:	Frances Martin, Executive Director of Environment, Climate & Public Protection

1. Executive Summary

1.1 In line with the Council's Fairer Westminster strategy and other environmental commitments, this report follows on from the 'Parking Fee Structure Review – Approval Of Concept' Cabinet Member report of 24 May 2023 (the 'May 2023 report'), which is listed as a background paper. This sought approval in principle for the development of emissions-based charging schemes for both pay-to-park casual kerbside parking and resident parking permits. Approval was formally given on June 26, 2023. The May 2023 report advised that the detail for the respective schemes would be presented to the Cabinet Member in due course later in the financial year. This report therefore concerns itself with the detail and actual proposed charging rates of the respective schemes.

1.2 It is proposed that both schemes operate on a similar basis, with the application of banded charges based upon vehicles' individual tailpipe emission levels of Carbon Dioxide (CO₂). It is also proposed that an additional diesel surcharge apply respectively for pre-2015 diesel vehicles to address the issue of the emission of Nitrogen Oxides (NO_x).

1.3 It is anticipated that implementation will only occur for the pay-to-park scheme in the financial year 2023/24 and that the resident permit scheme will not be introduced until 2024/25. The reason for the delayed lead-in time for resident permits is twofold: to help enable and better inform residents who may be looking to change their vehicle in the interim or who are considering giving up private vehicle ownership altogether in favour of more sustainable modes of transport, such as car club/car sharing schemes; and as a more complex scheme, to ensure that enough time is afforded to its successful implementation.

1.4 Post-implementation the Council would still look to continue to develop both schemes. We will consider appropriate new innovations going forward, as and when they become available. However, it is anticipated that wherever possible the proposed tiered charging regime will act as an incentive for motorists, especially those residing in Westminster, to make the best possible choice in terms of vehicle ownership and vehicle usage.

2. Recommendations

2.1 That the Cabinet Member for City Management and Air Quality approves the following:

- The proposed charging regime and necessary operational changes for the pay-to-park scheme, as outlined in section 6.
- The proposed charging regimes and necessary operational changes for the resident permit scheme, as outlined in section 7.
- The necessary amendments to the existing Parking Place Traffic Management Orders to enable the new schemes.
- The proposed Implementation schedule and dates, as summarised in section 13.

3. Reasons for Decision

3.1 The proposals for both the pay-to-park and resident permit schemes align with the Fairer Westminster strategy and complement a number of corporate environmental policies, strategies and commitments as outlined in section 4.2 of the May 2023 report - '[Parking Fee Structure Review – Approval Of Concept](#)'. The improvement of air quality is an important priority for the Council and these policies support this aspiration.

3.2 The rationale for the proposals is outlined in sections 4.3 and 4.4 of the May 2023 report, but for ease of reference can be summarized as follows:

3.2.1 Pay-to-Park

- To discourage the use in Westminster of higher polluting private vehicles and thus positively affect the borough's air quality. This is the next logical step from our successful and innovative diesel surcharge scheme.
- To innovate and lead: whilst emissions-based charging schemes are now relatively common-place for resident permit schemes, this is not the case for pay-to-park casual parking.
- Our current pay-to-park charging structure does not fully reflect the Council's Fairer Environment aspirations and the charging structure is unsustainable with the rapid growth of electric vehicles (EVs). An emissions-based charging scheme will help future-proof the service against this as banded charges can be periodically reviewed and amended as appropriate.

3.2.2 Resident permits

- To introduce a fairer and more proportionate charging structure, based on vehicles' tailpipe emissions levels.
- To bring the current charging structure up to date as it is simply no longer fit for purpose:
 - Classification by engine size pre-dates modern engine technology, meaning there are currently large disparities within each band.
 - The current permit scheme is unable to accommodate the growth of EVs and the diverse range of different 'hybrid' types.
 - Its 'eco' classification is too wide and should no longer provide annual permits free of charge.
- To encourage residents to make the best choice in terms of vehicle ownership, vehicle use and modes of transport.
- Emission-based charging for resident parking schemes has become more commonplace and continuing to base charging on vehicle type and engine capacity would see the Council lagging behind its neighbours and fellow London boroughs.

3.2.3 Whilst the proposals share some ambitions of Transport for London's Ultra Low Emission Zone scheme (ULEZ), the schemes are unrelated. The City of Westminster has some of the highest carbon emissions and worst air quality of any national local authority, so the Council's proposed schemes look to deliver more local positive

impacts through the provision of discounts for 'cleaner', less polluting vehicles. Despite its recent expansion London-wide, ULEZ has applied in Westminster since its original incarnation in April 2019 when it was laid over the pre-existing Central London Congestion Charging Scheme of 2003.

4. Background, including Policy Context

4.1 The background and policy context were outlined in section 4 of the May 2023 report - ['Parking Fee Structure Review – Approval Of Concept'](#).

4.2 The focus on air quality aligns fully with the Council's Fairer Westminster priorities, in particular the Fairer Environment objectives. It aligns with the Council's Climate Emergency Declaration and also features strongly in a range of other current and future council policies and strategies such as: The Greener City Action Plan 2015-2025; Air Quality Manifesto 2018; Walking Strategy 2017-2027; The City Plan 2019-2040; EV Charging Infrastructure Strategy 2019-2025; and Air Quality Action Plan 2019-2024.

4.3 The May 2023 Report set out the how the current pay-to-park and resident permit schemes operate (in sections 4.4 and 4.3 respectively). This information has been included, and in the case of the resident permit scheme updated slightly, as appendices C and D to this report.

4.4 One development to the information contained in paragraph 4.3.5 of the May 2023 Report is that the Council is now in the process of converting its resident permit scheme to one of 'virtual'/digital permits. All new, renewed or replaced permits from 1 April 2023 have been issued electronically rather than in physical paper form, meaning that by 31 March 2024 all paper resident permits will have been phased out.

5 Emissions-Based Charging

5.1 The aim of the emissions-based charging schemes is to encourage the use of low-polluting vehicles and, by the same token, to discourage the use of those which are more polluting. The schemes aim to 'nudge' those who park regularly in Westminster when making choices about vehicle use and ownership, in terms of the type of vehicles they own, or whether they actually need to use those vehicles in Westminster at all or could alternatively rely on public transport and/or the Council's car club schemes.

5.2 The principles underlying the emissions-based charging schemes that the Council propose were outlined in section 5 of the May 2023 report - ['Parking Fee Structure Review – Approval Of Concept'](#).

5.3 By utilising available DVLA data fields, as accurate a system as possible of linking parking charges to emissions levels can be attained. Charges can be directly linked to CO₂ output levels for most vehicles, with a diesel surcharge to cover the

heaviest NO_x polluters. Year of manufacture and engine size data is then necessary for pre-2001 vehicles as the DVLA do not record information of CO₂ levels for vehicles of that age.

5.4 The DVLA data available to us has limitations however, as outlined in section 5.12 of the May 2023 report - [‘Parking Fee Structure Review – Approval Of Concept’](#).

5.5 Available data may also be limited by what the software providers are able to handle. By the Council insisting on extra data fields to those the software providers provide to local authorities as standard, or those that it is practicable for them to obtain, this may impact the Council’s wider procurement strategies and result in reduced effectiveness and value with regard to pay-to-park software.

5.6 It should be noted that driver behaviour is evolving and over the course of time it is expected that EVs and other cleaner, less polluting vehicles will become more popular, commonplace and widespread. This needs to be borne in mind with any scheme that is introduced, and close monitoring will be necessary. Whilst the schemes cannot be fully futureproof, their charging structures can be periodically reviewed and amended to take account of this and to continue driving the desired behaviours.

6 Proposed Emissions-Based Charging Scheme for Pay-to-Park

6.1 The proposed tiered charging structure for pay-to-park is as per the following table. This splits vehicles into five bands dependent upon CO₂ emission levels as defined by the DVLA. There are also then separate bands for motorcycles and ‘unknown’ vehicles, i.e. those not registered with the DVLA, including foreign registered vehicles. These vehicles sit outside of the band one to five categories as their CO₂ emission level data cannot be obtained from the DVLA.

Band	CO ₂ Emissions (g/km)	A zone (p/hr)	B zone (p/hr)	C zone (p/hr)	D zone (p/hr)	E zone (p/hr)	F zone (p/hr)	G zone (p/hr)	% of pay-to-park sessions 2022/23
1	0	£3.18	£2.58	£1.46	£2.13	£4.41	£4.62	£4.62	19.7%
2	1 – 90	£3.64	£2.95	£1.67	£2.44	£5.04	£5.28	£5.28	5.8%
3	91 – 150 or pre-2001 ≤1200cc	£5.00	£4.05	£2.29	£3.35	£6.93	£7.26	£7.26	35.0%
4	151 – 255 or pre-2001 >1200cc	£5.46	£4.42	£2.50	£3.66	£7.56	£7.92	£7.92	36.7%
5	>256	£6.37	£5.16	£2.92	£4.27	£8.82	£9.24	£9.24	2.8%
M	Motorcycles (base rate)	£4.55	£3.69	£2.09	£3.05	£6.30	£6.60	£6.60	n/a
U	Unknown	£6.37	£5.16	£2.92	£4.27	£8.82	£9.24	£9.24	

6.1.1 The hourly zonal tariffs quoted in the table above are derived from zonal base rates. The base rates themselves (highlighted as bold above) only apply to the

motorcycle banding but each of the other bands' zonal rates are determined as a plus or minus percentage from its base rate, as follows -

Band	CO ₂ emissions (g/km)	Charges against zonal base rate
1	0	-30%
2	1 – 90	-20%
3	91 – 150 or pre-2001 <1200cc	+10%
4	151 – 255 or pre-2001 >1200cc	+20%
5	>256	+40%
M	Motorcycles	Base rate
U	Unknown	+40%

6.2 The CO₂ emission level thresholds within the proposed bands are based on those used by the DVLA. The DVLA operate 13 categories of CO₂ emissions, which we have combined in our proposal as follows –

DVLA CO ₂ banding category	CO ₂ emissions (g/km)	Proposed WCC band
1	0	1
2	1 – 50	2
3	51 – 75	
4	76 – 90	
5	91 – 100	3
6	101 – 110	
7	111 – 130	
8	131 – 150	
9	151 – 170	4
10	171 – 190	
11	191 – 225	
12	226 – 255	
13	256 – 5,000	5

6.3 On top of the relevant banded zonal charge, a 50% Diesel Surcharge would then be applied to all pre-2015 diesels in any band, as has been the case for pay-to-park charges in Westminster since 2019 (and 2017 in zone F).

6.4 Vehicle details would be obtained electronically via a look-up facility with the DVLA's database at the point of purchase. This would establish a vehicle's fuel-type, year of manufacture, engine capacity and CO₂ emissions level, enabling it to be placed in the correct payment tier. Any vehicle returned as being unregistered with or unknown by the DVLA would be charged at band 5 rates. Pre-2001 vehicles with engine capacity 1200cc or below will be placed in band 3, with those 1201cc and above being placed in band 4.

6.5 The Council have traditionally advertised pay-to-park tariffs on-street on kerbside signage. However, such a tiered charging structure would be impracticable to sign on-street. There is no legal requirement to display charges at the kerbside and many London boroughs do not do it, including our neighbours the Royal Borough of Kensington & Chelsea and the London Borough of Camden. The intention would

therefore be for our bay signage to dispense with the displaying of charges, although all the other information currently displayed at the bays on the statutory signs and the Conditions of Use plates will remain. However, motorists will always be informed how much a parking session will cost prior to any commitment to pay, either via the pay-to-park app, phone or text, or upon the purchase a Parking Card.

6.6 Zonal Parking Cards (scratchcards) will remain in use and available from Westminster libraries. Each zonal card, the display of which enables one hour's parking in a pay-to-park bay within that zone, will retail at the cost of one hour's parking at that zone's base rate, as follows.

Zone	Cost per scratchcard
A	£4.55
B	£3.69
C	£2.09
D	£3.05
E	£6.30
F	£6.60
G	£6.60

6.7 Similarly, daily zonal Trades Permits will remain available, at the cost of ten hour's parking in each respective zone at its base rate, as follows.

Zone	Cost per Trades Permit
A	£45.50
B	£36.90
C	£20.90
D	£30.50
E	£63.00
F	£66.00
G	£66.00

6.8 A comparison to other central London boroughs' pay-to-park charges is included as appendix E.

7 Proposed Emissions-based Charging Scheme for Resident Permits

7.1 The proposed tiered charging structure for resident permits is as per the following table.

Band	CO ₂ emissions (g/km)	Proposed permit charge (p/yr)	No. of vehicles	% of vehicles
1A	0 (small 1-69 kwh battery)	£40.00	3,155	10.1%
1B	0 (large ≥70 kwh battery)	£80.00		
2	1 – 90	£90.95	2,165	6.9%
3	91 – 130	£123.05	8,009	25.6%
4	131 – 150 or pre-2001 <1200cc	£139.10	4,846	15.5%
5	151 – 255 or pre-2001 >1200cc	£214.00	9,937	31.7%
6	>256	£321.00	1,621	5.1%
M	motorcycles	£60.99	577	1.8%
U	unknown	£321.00	1,060	3.4%
TOTAL			31,370	100.0%

7.2 This splits vehicles into six main bands depending upon CO₂ emission levels as defined by the DVLA. The proposal for the resident permit scheme differs from pay-to-park in a number of ways.

7.2.1 Band 1 is to be split between EVs with smaller and larger battery size: Band 1A to apply to EV batteries of 1 to 69 kwh and band 1B to those 70 kwh and greater. This distinction has been made because battery technology has improved significantly since the mainstream adoption of EVs, and there are now very large EV SUVs and sports cars, where there is significant carbon imprint from the production and recycling of the battery. Larger batteries are often associated with larger vehicles that have a physically larger footprint and occupy more kerbside space. Vehicles with larger batteries also tend to be heavier, creating more wear on the highway, and therefore also requiring more braking effort to slow them down generating increased brake dust. The City Council will ensure that the structure of the permit scheme reflects evolution of battery technology used in EVs and as such the Cabinet Member may direct the future changes of banding and fees for EV permits.

7.2.2 What constitutes band 3 in the pay-to-park scheme (91-150 g/km) is separated into two bands for resident permits (band 3 - 91-130 g/km and band 4 - 131-150 g/km). This is due to the number of vehicles that would fall into a single band under the resident permit scheme.

7.3 Consistent with the pay-to-park proposal, the year of manufacture and engine size data remains a necessary classification for pre-2001 vehicles as the DVLA do not record CO₂ information for vehicles of that age. Whilst we may ideally prefer to use, or at least incorporate, Euro Standards classification, these are currently not collated by the DVLA and are thus unavailable. Pre-2001 vehicles with engine capacity 1200cc or below will be placed in band 4, with those 1201cc and above being placed in band 5.

7.4 There are also then separate bands for motorcycles and 'unknown' vehicles, i.e. those not registered with the DVLA, including foreign registered vehicles. These vehicles sit outside of the band 1-6 categories as their CO₂ emission level data cannot

be obtained from the DVLA.

7.4.1 There may be future potential to distinguish EV motorcycles from non-EV if the use of EV motorcycles becomes more widespread. Currently it is not felt that it is necessary as numbers are very low and in the context of the scheme, proposed motorcycle charges are low, but it is something we would monitor and look to incorporate should the market for EV motorcycles develop.

7.4.2 Unknown vehicles are not an issue for the resident permit scheme as the Council can request further information from the applicant in the form of documentation or evidence prior to permit issue to establish the correct banding. Until a correct banding can be established, such vehicles would be charged at the band 6 rate.

7.5 The CO₂ emission level thresholds within the proposed bands for the resident permit scheme are again based on those used by the DVLA, and apply differently to the pay-to-park proposal –

DVLA CO ₂ banding category	CO ₂ emissions (g/km)	Proposed WCC band
1	0	1A & 1B
2	1 – 50	2
3	51 – 75	
4	76 – 90	
5	91 – 100	3
6	101 – 110	
7	111 – 130	
8	131 – 150	4
9	151 – 170	5
10	171 – 190	
11	191 – 225	
12	226 – 255	
13	256 – 5,000	6

7.6 The proposed tiered charging structure would affect current resident permit holders as illustrated in the following table. The table below shows the number of current resident permit holding vehicles that would slot into each band and how the proposed charges would affect them. To illustrate, of those current permit holders who will fall into band 4 where a permit would cost £139.10 p/a, 350 permit holders have hybrid vehicles and currently pay £0.00 for a free 'eco' permit, 429 have smaller cc vehicles and currently pay £117.50 p/a, and 4,067 have higher cc vehicle and currently pay £166 p/a -

Band	Charge (p/yr)	Current charge	Difference (proposed vs current)	No. of vehicles	% of total permits	
1A / 1B *	£40.00 / £80.00	£0.00	+£40 / +£80	3,155	10.1%	10.1%
2	£90.95	£0.00	+£90.95	1,898	6.0%	6.9%
		£117.50	-£26.55	49	0.2%	
		£166.00	-£75.05	218	0.7%	
3	£123.05	£0.00	+£123.05	1,221	3.9%	25.6%
		£117.50	+£5.55	2,219	7.1%	
		£166.00	-£42.95	4,570	14.6%	
4	£139.10	£0.00	+£139.10	350	1.1%	15.5%
		£117.50	+£21.60	429	1.4%	
		£166.00	-£26.90	4,067	13.0%	
5	£214.00	£0.00	+£214.00	277	0.9%	31.7%
		£117.50	+£96.50	25	0.1%	
		£166.00	+£48.00	9,635	30.7%	
6	£321.00	£0.00	+£321.00	3	0.0%	5.1%
		£117.50	+£203.50	6	0.0%	
		£166.00	+£155.00	1,611	5.1%	
M	£60.99	£57	+£3.99	577	1.8%	1.8%
U	£321.00	£0.00	+£321.00	293	0.9%	3.4%
		£117.50	+£203.50	73	0.2%	
		£166.00	+£155.00	694	2.2%	
TOTAL				31,370	100.0%	100.00%

* At time of writing we are unable to distinguish band 1A & 1B EVs by battery size so cannot illustrate the proposed vs current pricing differences as we have done for the other bandings.

7.6.1 Examples of vehicles from the above table are included in appendix H.

7.7 A £50 Diesel Surcharge on top of the relevant permit charge to cover the heaviest NO_x polluters would apply to all pre-2015 diesels in any band.

7.8 Vehicle details would be obtained electronically via a look-up facility with the DVLA's database at the point of application. This would establish a vehicle's fuel-type, year of manufacture, engine capacity and CO₂ emissions level, enabling it to be placed in the correct payment tier. Should further information, documentation or evidence be required, this can be requested from the applicant by the back office.

7.9 The implementation of an emissions-based charging scheme for resident permits necessitates the replacement of the policy allowing up to two vehicle registration marks (VRMs) on a single permit policy by one whereby each VRM would be covered by a single, individual permit. To accommodate this, individuals would be entitled to purchase additional permits for their different vehicles, up to a maximum of three per individual, but with the application of an additional charge per permit as shown in the table below. This would apply to new applications and any permit renewals from 1 April 2024. Currently 8.5% of resident permits on issue contain two VRMs. Second permits would be charged an additional £50 on top of the price of the permit and third permits an additional £100. The scheme's recent conversion to 'virtual'/electronic permits accommodates this policy change.

Permit type	Annual price
Second resident permit per individual	Price + £50
Third resident permit per individual	Price + £100

7.9.1 We would however place no limit upon permit issue to households. Such a policy would be complex and burdensome to operate and would be inequitable, especially for shared, non-family-based households.

7.10 A comparison to other central London boroughs' resident permit charges is included as appendix F.

7.11 In order to consolidate the aspirations of the scheme being proposed going forward, as part of its annual fees and charges reviews the Council would look to top load any future charging increases to the higher, more polluting, bands.

8 Financial Implications

8.1 Parking Services have revenue income budgets in 2023/24 of £43.701m in respect of Pay-to-Park, and £4.362m in respect of Residential Parking.

8.2 Savings of £3.250m linked to a Parking Fee Structure Review were approved in March 2023, and are profiled so that £1.630m is included in the above 2023/24 budgets and the remaining £1.620m will be applied to 2024/25 budgets.

8.3 If approved, the fees proposed in this report would result in a further saving of £2.990m being presented to the Medium-Term Financial Plan, bringing the overall total savings in respect of the Fee Structure Review on Pay-to-Park to £6.240m. This would comprise additional income of £5.310m on Pay-to-Park, £0.840m on Resident Permits, and £0.090m on Trade Permits.

8.4 No budget commitments are made in respect of potential future changes. Parking volumes and fuel types mix will continue to be monitored and potential future impacts will be considered. Charges will continue to be considered annually as part of the Council's fees and charges reviews.

8.5 Approved capital budgets in respect of the estimated setup and mobilization costs for the project total £140,000 in 2023/24. It is expected that this remains sufficient to cover the implementation costs of the proposal.

8.6 Parking have a revenue budget of £0.430m for the ongoing system and transaction costs associated with Pay-to-Park and Resident Permits. These will be unchanged, and thus met within current budgets. Parking Services are exploring systems to deliver the EV battery size look-up functionality with the Technology Contract provider, and early market research indicates that the cost of this can also be met within existing budgets.

8.7 Parking are considering the addition of 1 FTE for a Data Analyst role to provide operational analysis and decision support capability. This will enable the service to

better analyze vehicle trends and will assure the approved and proposed savings. The extra cost of £0.060m will be met by additional Pay-to-Park income.

8.8 Parking revenues form part of the Parking Places Revenue Account in line with the requirements of the Road Traffic Regulation Act 1984, under which any surplus is applied to expenditure such as highways or road improvement projects and environmental improvements.

9 Legal Implications

9.1 The Council's traffic management duties under the Road Traffic Regulation Act 1984 and the Traffic Management Act 2004 mean that as well as having regard to the cost of scheme administration and enforcement, charging regimes should also have regard to traffic management and air quality considerations. Therefore, the setting of charges can legitimately be used as a method of restraining demand to enable more effective management of the kerbside and to positively affect air quality. The setting of charges cannot however be used as a means to purely and intentionally raise revenue, although the generation of revenue is permitted if it is incidental to the setting of charges for other valid reasons.

9.2 Through the implementation of emission-based charging schemes the Council aim to positively affect air quality across Westminster, by reducing the number of the higher polluting vehicles utilising pay to park and resident permit bays.

9.3 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.

9.4 Section 122 of the RTRA 1984 sets out the considerations which must be taken into account by the Council in exercising its powers under the Act, including in relation to parking. 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.*

9.5 A number of cases have considered the legal duties of local authorities in relation to the exercise of their powers contained under section 122 of the 1984 Act and two main themes have emerged.

9.5.1 In the leading case of *Cran v London Borough of Camden* (1995) RTR 346 it was established that even though section 122(2)(d) allows a local authority to take into account any other matters appearing to it to be relevant, it does not allow the local authority, in setting the charges for parking, to take account of extraneous financial matters such as the aim of generating revenue for other Council projects, however worthy such projects might be. As long as the *Cran* case remains the law, the Council cannot set or increase its charges with the motive of generating revenue. This decision has been reinforced in subsequent decisions including *Attfield vs London Borough of Barnet* (2013) EWHC 2089 (Admin).

9.5.2 In contrast to the above there are a number of decisions in which the Courts have made clear that the creation of a surplus from increased parking charges will not in and of itself be unlawful providing the primary motivation for or intention of the increase is the achievement of objectives which are consistent with the duty contained in section 122. This principle was established in the case of *Chaumeton v London Borough of Camden* (2015) EWHC 1010 which highlighted the fact that Camden's purpose was not to raise revenue but was to address the problems that come with private vehicular traffic and was thus considered a legitimate purpose. The Court therefore erred in the Council's favour by stating that it had acted in good faith and there was no evidence to support the allegation made by the claimant that the intended purpose of the increases and changes in parking charges, introduced through traffic management orders made on 20 March 2012, was to help the Council raise additional revenue for various purposes, a claim firmly rejected by the Court.

9.5.3 In a direct reference to the issues raised in this report, it was, however, accepted in the case of *Djanogly v City of Westminster* 2011 RTR 21 that it would have been a proper exercise of the Council's powers to raise charges with a view to depressing demand. It therefore would be, in this case, a proper aim for the City Council to set differential parking charges across the zones with the objective of controlling demand in the most oversubscribed areas.

9.6 The proposals outlined in this report would necessitate amendments to the Council's Parking Place Traffic Management Orders.

10 Carbon Impact

10.1 The Council has made a commitment to become carbon neutral council by 2030 and a carbon neutral City by 2040. The introduction of these policies would positively affect the Carbon impact in the City.

10.2 Whilst this approach is likely to deliver a beneficial Carbon impact it is difficult to quantify what this may be. So many factors are involved in determining a resident's or visitor's vehicle or journey choice. As outlined in paragraph 5.1, these proposals merely aim to 'nudge' those who park regularly in Westminster when making choices about vehicle use and ownership, rather than be the sole or primary reason for that choice.

11 Equalities Impact

11.1 In terms of how people with protected characteristics may be impacted by the proposed schemes, the EQIA included as appendix B summarises that there could potentially be a disproportionate impact upon disabled people and people on low incomes.

11.2 Motorists' (in)ability to change or replace their vehicle, should it become subject to higher charges under either scheme, is a potential negative impact, which may be particularly pertinent to those with vehicles adapted for disabled drivers/passengers, or for those on low incomes whose vehicles may also be older and more polluting.

11.3 Positive impacts however have been identified for elderly people and young people (including those indirectly impacted by the policy as they are under the legal driving age), as they are groups identified as being most vulnerable to the effects of poor air quality, which this policy aims to help improve.

11.4 A further potential positive impact has also been identified for people on low incomes, as there is a recognised correlation between income inequalities and exposure to poor air quality, which again this policy aims to help improve.

11.5 In terms of mitigating the identified negative impacts, this is difficult as the whole point of the policy is to discourage ownership and use of more polluting vehicles. Low-cost and more sustainable alternatives to car ownership and use exist (walking, cycling, public transport, car clubs etc.) and will be encouraged but these may not always be practical or appropriate in some cases.

11.6 For disabled drivers/passengers, the current parking concessions afforded would continue to apply. For Westminster residents and organisations, as well as blue badge holding workers, students or those receiving life-saving medical treatment in Westminster, white disabled badges, which are issued without charge, enable free parking throughout the City in pay-to-park, resident bays and blue badge bays. For visitors various parking concessions are still afforded to disabled blue badge holders, meaning parking is comparatively cheaper and more convenient compared to non-badge holders. Blue badge holders can park in blue badge bays for free and are

granted an extra hour's grace after the expiry of paid for time in pay-to-park bays. Since 2019, blue badges can be issued to those with non-physical disabilities, as well as physical.

11.7 Formal Traffic Order consultation will be necessary before implementation of either scheme.

12 Consultation

12.1 Proposals for the emissions-based charging schemes were presented to the Council's Policy & Scrutiny Committee in June 2023. This helped inform the nature of the proposals prior to submission to the Cabinet Member for implementation in this report.

12.2 As part of the implementation process, each scheme will be the subject of formal Traffic Management Order consultations with residents, statutory consultees and neighbouring boroughs.

12.3 Due to the significance and potentially polarizing nature of the proposals, the Council will proactively promote the consultation wider than normal and invite responses from permit holders and pay-to-park users in particular.

12.4 As the schemes would apply city-wide, Ward Members will be given the opportunity to comment as part of the wider Traffic Order consultation.

13 Implementation

13.1 Assuming approval for the pay-by-park scheme proposals detailed in this report is forthcoming, a period of mobilisation would be necessary to configure and test the pay-to-park and other back-office systems, consult and make the necessary changes to the Traffic Orders, amend the on-street signage, update online content and literature and issue comms. It is anticipated mobilization would be an eight to ten week process and therefore implementation would be in early 2024.

13.2 Assuming approval for the resident permit scheme proposals detailed in this report is forthcoming, a longer period of mobilisation would be necessary to configure and test the permit and other back office systems, set up and incorporate the EV battery size look-up functionality, consult and make the necessary changes to the Traffic Orders, and update online content, literature and application forms. A comms campaign of greater depth will also be required for permit holders to explain the changes and to give generous advance warning. It is therefore anticipated that implementation for the resident permit scheme would not occur until 1 April 2024.

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

Darren Montague, Parking Implementation Manager
dmontague@westminster.gov.uk

APPENDICES

Appendix A – Other implications

Appendix B – Equalities Impact Assessment

Appendix C – Current pay-to-park casual parking scheme

Appendix D – Current resident permit scheme

Appendix E – Comparisons with other boroughs' pay-to-park schemes

Appendix F – Comparisons with other boroughs' resident permit schemes

Appendix G – Electric Vehicle charging provision in Westminster

Appendix H – Examples illustrating how vehicles would slot into the proposed Resident Permit structure.

BACKGROUND PAPERS

['Parking Fee Structure Review – Approval Of Concept'](#) Cabinet Member Report dated 24 May 2023.

APPENDIX A - Other Implications

- 1. Resources Implications - none**
- 2. Business Plan Implications - none**
- 3. Risk Management Implications - none**
- 4. Health and Wellbeing Impact Assessment including Health and Safety Implications - none**
- 5. Crime and Disorder Implications – none**
- 6. Impact on the Environment – see section 10**
- 7. Equalities Implications – see section 11 and appendix B**
- 8. Staffing Implications - none**
- 9. Human Rights Implications - none**
- 10. Energy Measure Implications - none**
- 11. Communications Implications – see sections 12 and 13**
- 12. Counter Terrorism and Security Implications - none**

APPENDIX B – Equalities Impact Assessment

Under separate cover.

APPENDIX C – Current Pay-to-Park Casual Parking Scheme

There are approx. 9,800 pay-to-park spaces throughout Westminster, which are controlled 08.30-18.30 on weekdays and up to 18.30 on Saturdays in some areas. Approx 6m pay-to-park transactions were made in 2022/23.

Our pay-to-park charging regime has traditionally been based on demand and occupancy levels, although air quality is becoming an increasingly important consideration, and is set to replace the traditional occupancy/demand/kerbside stress consideration as the primary basis for future parking policy.

Casual visitor parking in Westminster is defined zonally: with the City split into seven parking zones A-G, each with differing hourly kerbside parking charges. Additionally, since August 2019 (and since April 2017 in F zone), we have operated a diesel surcharge scheme which adds a 50% surcharge on pre-2015 diesel vehicles paying to park. A DVLA look-up process upon payment of establishes a vehicle's fuel-type and year of manufacture, and the vehicle is charged accordingly.

Our current pay-to-park charges are as detailed below. They last increased in February (zones E-G) and March (zones A-D) 2023 –

Parking Zone	Current Pay-to-park charges (p/hr)
'A' zone	£4.22
'A' zone (pre-2015 diesel vehicles - diesel surcharge)	£6.33
'B' zone	£3.42
'B' zone (pre-2015 diesel vehicles - diesel surcharge)	£5.13
'C' zone	£1.94
'C' zone (pre-2015 diesel vehicles - diesel surcharge)	£2.91
'D' zone	£2.83
'D' zone (pre-2015 diesel vehicles - diesel surcharge)	£4.24
'E' zone	£5.69
'E' zone (pre-2015 diesel vehicles - diesel surcharge)	£8.53
'F' zone	£5.80
'F' zone (pre-2015 diesel vehicles - diesel surcharge)	£8.70
'G' zone	£5.80
'G' zone (pre-2015 diesel vehicles - diesel surcharge)	£8.70

While Westminster was the first borough to introduce a diesel surcharge in 2017, a number of other boroughs now operate borough-wide diesel surcharge schemes.

We currently operate a concession for EVs/plug-in hybrid electric vehicles (PHEVs) whereby drivers need only pay the minimum charge (10 mins) to obtain the maximum stay for the bay (commonly 4 hours). However, due to DVLA look-up data limitations, all hybrid vehicles receive this concession as the data doesn't differentiate PHEV from other hybrid types.

Concessions are also afforded to disabled badge holders. Holders of a white disabled badge (Westminster residents and those working, studying or receiving life-saving medical treatment in Westminster) can park in pay-to-park bays free of charge. Disabled blue badge holders are afforded one extra hour's parking after the expiry of a paid-for parking session.

Data shows that resident permit holders account for <5% of total city-wide pay-to-park transactions in Westminster. Permit holders are of course required to pay to park when parking outside of their own zone of residence.

The appropriate zonal charges are currently displayed on kerbside Conditions of Use plates situated at most pay-to-park bays. However, there is no legal requirement for charges to be displayed on kerbside signage as long as it is clearly to the motorist how much their parking transaction will cost before they commit to making a payment.

APPENDIX D – Current Resident Permit Scheme

Since April 2000 the Council has operated a differential pricing system for resident permits based on vehicle engine size, as detailed by DVLA vehicle records. The threshold was introduced to encourage residents to purchase/own/use smaller engine-sized and less polluting vehicles. The threshold was originally 1100cc but was amended to 1200cc in April 2001 in response to the DVLA introducing what were then 12 new road fund licence rates related to vehicle emissions for new cars. At the time it was considered too confusing and impractical for the Council to mirror this with 12 different permit prices, so the two-tier price system continued with an amended threshold to reflect the DVLA's changes. This basic charging system has remained in operation for Westminster resident permits since.

The current differentiation for the scheme is that a resident with a vehicle with an engine size of up to and including 1200cc (cubic centimetres) can currently obtain a resident permit at a significantly discounted rate in comparison to a vehicle with a larger engine. Alongside this, motorcycles are charged a further set reduced fee and 'eco' vehicles, classed as being electric, gas, hybrid or fuel-cell, are afforded permits free of charge. Charges are consistent across all parking zones.

Resident permit charges are as detailed below, having most recently been increased in February 2023. The vast majority of permits on issue are for vehicles with an engine capacity of more than 1200cc -

Permit Classification	Current Annual Charge	% of resident permits on issue (May 2023)
Engine size ≤1200cc	£117.50	6.4%
Engine size >1200cc	£166.00	82.5%
Motorcycles	£57.00	1.5%
'Eco' vehicles	£nil	9.6%

Any individual resident is limited to one resident permit, upon which they can currently have a maximum of two vehicles, charged at the higher rate of the two. Permits are not limited by household or address. Approx. 6.7% of permits currently on issue contain two vehicle registration marks.

Resident permits have traditionally been issued in physical form as a paper permit for display in the vehicle's windscreen, and permit holders have been encouraged to do this at all times when using the permit. However, permit details have also been available to the Marshals via their handheld devices, meaning that where it may be difficult or impractical for a permit holder to display their physical permit (for example, on a motorcycle), a Marshal has been able to identify a permit-holding vehicle and give it the relevant parking concessions accordingly. However, from 1 April 2023 the resident permit scheme has become 'virtual', with new, renewal or replacement permits from this date being issued digitally/electronically, dispensing with the need for any physical permit to be displayed in the windscreen. Existing paper permits can still be used whilst they are valid but no more will be issued, meaning they will all be phased out by 31 March 2024. The same terms and conditions apply to virtual permits as to paper ones barring the need to physically display them in the vehicle.

Many London boroughs now operate an emissions-based charging structure for their resident permit schemes, to the extent that the concept has become fully established. Each borough's scheme is slightly different, with some being more complex and intricate than others, but many involve incremental permit charges dependent upon emission levels.

Appendix E – Comparisons with other boroughs' pay-to-park schemes

Comparison of different boroughs' pay-to-park schemes can often be difficult due to the individual nature and intricacies of each borough's scheme.

As per 1 September 2023 -

Borough	Lowest charges p/hr	Highest charges p/hr	Diesel surcharge
LB Brent	£2.00	£2.50	no
LB Camden *	£2.38	£8.06	no
City of London	£5.00	£10.00	no
City of Westminster	£0.32 (EV)	£8.70	yes
LB Hammersmith & Fulham	£2.50	£6.00	yes
LB Islington	£2.00	£12.85	yes
LB Lambeth	£3.20	£8.19	yes
RBKC	£1.50	£6.80	yes
LB Southwark	£4.75	£11.25	yes
LB Wandsworth	£1.50	£3.90	no

* LB Camden is currently in the process of consulting on restructuring its pay-to-park charges for 2024/25. Their proposal is for the lowest charge for EV 0g/km vehicles to rise from £2.38 to £3.84 and its highest from £8.06 to £10.34. LB Camden also proposes introducing additional pre-Sep 2015 petrol and pre-Sep 2019 diesel surcharges.

Appendix F – Comparisons with other boroughs' resident permit schemes

Comparison of different boroughs' permit schemes are often very difficult due to the individual nature and intricacies of each borough's scheme.

As per 1 September 2023 -

Borough	Lowest charge p/yr	Highest charge p/yr	Limit on individual	Limit on household	Tiered based on emissions &/or fuel type	Diesel surcharge
LB Brent	£25.00	£530.00	3	3	3 tiers	yes
LB Camden *	£45.46	£648.20	3 (3 VRMs)	3 (3 VRMs)	6 tiers	yes
City of London	n/a	n/a	n/a	n/a	n/a	n/a
City of Westminster	Free ('eco')	£166.00	1 (2 VRMs)	no	3 tiers	no
LB Hammersmith & Fulham	Free (EV)	£497.00	2	no	3 tiers	no
LB Islington	£50.00	£860.00	no	no	21 tiers	yes
LB Lambeth	£120.21	£640.00	no	no	13 tiers	yes
RBKC	£40.00	£40.00 +£1.00 for every per CO ₂ g/km +£74.00 diesel surcharge	2	2	6 tiers plus as per 'Highest charge' info	yes
LB Southwark	£30.00	£300.00	no	no	5 tiers	no (highest charge for ULEZ non-compliant)
LB Wandsworth	£150.00	£267.00	no	no	2 tiers	no

* LB Camden is currently in the process of consulting on restructuring its resident permit charges for 2024/25. Their proposal is for the lowest charge for EV 0g/km vehicles to rise from £45.46 to £138.90. LB Camden also proposes introducing an additional pre-Sep 2015 petrol surcharge alongside a pre-Sep 2019 diesel surcharge, as well as amending its policies on the number of vehicles which can be registered to a permit, from three down to one.

Appendix G – Electric Vehicle Charging Provision in Westminster

The City of Westminster has for some time now been at the forefront of EV charging provision. The City Council published its Electric Vehicle Charging Infrastructure Strategy in 2019 in which a five-year plan was set out for the roll-out of EV charging points to encourage the transition away from polluting fossil-fuelled vehicle use in Westminster. As the vast majority of residents in Westminster do not have off-street parking, the strategy accepts the need for significant levels of publicly available infrastructure to service the demand from residents switching to EV usage.

Supported by significant levels of funding, the City Council has consequently been successful in procuring contracts to install and manage nearly 2,500 charge points on the public highway in Westminster, of which approximately 2,200 are exclusively for residents to use, with 435 of those alongside dedicated charging bays. To put that into

context, that is more publicly available charge points than there currently are in the whole of Wales and that is an increase in around 2,300 charge points since the strategy was published.

Although the increase in the wholesale energy pricing has unnaturally affected electricity pricing, the fact that we have procured on the basis of a reduced customer price means that we have achieved best value for Westminster residents although we have had to provide additional capital to support the introduction of the hardware. Furthermore, we have also worked with operators to deliver better pricing for residents, including discounted rates for permits holders, and also smart charging that offers reduced rates at off peak times during the day.

Appendix H – Examples illustrating how vehicles would slot into the proposed resident permit structure.

The Council plans to introduce a split charge for EVs in its resident permit scheme. While EV battery charging technology and utilisation is changing rapidly, guidance as to how this will impact residents who own EVs can be found here:

<https://ev-database.org/uk/cheatsheet/useable-battery-capacity-electric-car>

This website shows the battery size across many of the new vehicles available on UK roads. This is for indicative purposes only and the City Council cannot be held liable for an errors or missing information on that site.

The Council's banding for resident permits is not based on price or size of vehicle and so there are a wide range of vehicles produced today that would fit into each band. While Band 1 cars are by their nature exclusively EVs (as this band is for zero-emission vehicles only), Band 2 sees mainly Plug-in Hybrids (PHEVs) which can run for substantial periods of time on EV power alone. As the emissions increase more conventional engines are seen.

The table below shows example vehicles on the market at present and how they would fit into the Council's table. Information sourced via AutoExpress magazine and is correct at the time of publishing the report. It is noted that there are many different models and specifications of most cars and that also will affect the purchase price or emissions. The information provided here is indicative only and is not to be considered endorsement or recommendation in any way.

WCC Band		Make	Model	Fuel / Engine Type	Engine size	Car Type	C02 (g/km)	Approx Price
1	0g/km	BYD	Dolphin	EV	NA	Supermini	0	£26,140
		Nissan	Leaf	EV	NA	Family	0	£28,995
		MINI	Mini	EV	NA	Supermini	0	£29,990
		Renault	Zoe	EV	NA	Supermini	0	£29,995
		MG	ZS	EV	NA	SUV	0	£30,495
		ORA	FunkyCat	EV	NA	Supermini	0	£31,995
		VW	iD.3	EV	NA	Family	0	£37,115
		Kia	Niro	EV	NA	Family	0	£37,295
		Honda	e	EV	NA	City	0	£37,395
		Skoda	Enyaq	EV	NA	SUV	0	£38,970
		Polestar	2	EV	NA	Executive	0	£44,950
		Mercedes	EQC	EV	NA	SUV	0	£74,330
		Porsche	Taycan	EV	NA	Sports	0	£79,200
		Tesla	Model X	EV	NA	Luxury	0	£99,930

WCC Band		Make	Model	Fuel / Engine Type	Engine size	Car Type	C02 (g/km)	Approx Price
2	1 to 90g/km							
		Land Rover	Range Rover	PHEV	2.0	Luxury	16	£115,530
		VW	Golf	PHEV	1.4	Family	21	£36,660
		Suzuki	Across	PHEV	2.5	SUV	22	£48,129
		Ford	Kuga	PHEV	2.5	SUV	23	£37,755
		Audi	A3	PHEV	1.4	Family	25	£35,910
		Peugeot	508	PHEV	1.6	Family	25	£43,790
		BMW	3 Series	PHEV	2.0	Executive	30	£46,285
		Audi	Q5	PHEV	2.0	SUV	35	£53,715
		Jeep	Renegade	PHEV	1.3	SUV	41	£36,500
		MG	HS	PHEV	1.5	SUV	43	£31,095
		Jaguar	F- Pace	PHEV	2.0	SUV	43	£60,985
		Mercedes	GLC	PHEV	2.0	SUV	47	£63,200

3	91 to 130g/km	Make	Model	Fuel / Engine Type	Engine size	Car Type	C02 (g/km)	Approx Price
		Toyota	Yaris	Hybrid	1.5	Supermini	92	£22,125
		Renault	Clio	Hybrid	1.6	Supermini	96	£21,295
		Suzuki	Swace	Hybrid	1.8	Family	99	£27,499
		Honda	Jazz	Hybrid	1.5	Supermini	102	£25,900
		Toyota	Corolla	Hybrid	1.8	Family	102	£30,225
		Renault	Captur	Hybrid	1.6	SUV	106	£25,795
		Dacia	Sandero	Petrol	1.0	Supermini	109	£13,795
		Toyota	Aygo-X	Petrol	1.0	City Car	109	£15,990
		Fiat	500	Hybrid	1.0	City Car	114	£16,790
		Skoda	Octavia	Petrol	1.0	Family	116	£25,450
		Nissan	Juke	Hybrid	1.6	Supermini	116	£28,210
		Hyundai	i-30	Petrol	1.0	Family	118	£21,950
		VW	Golf	Petrol	1.5	Family	122	£17,175
		Citroen	C3	Petrol	1.2	Supermini	123	£13,995
		Vauxhall	Astra	Petrol	1.2	Family	123	£26,960
		Audi	A4	Diesel	2.0	Executive	125	£39,800
		Peugeot	3008	Hybrid	1.2	SUV	127	£34,130
		BMW	1 Series	Petrol	1.5	Family	130	£28,290

4	131 to 150g/km	Make	Model	Fuel / Engine Type	Engine size	Car Type	C02 (g/km)	Approx Price
		Mazda	3	Petrol	2.0	Family	136	£23,945
		Mini	Clubman	Petrol	1.5	Supermini	136	£27,440
		VW	Tiguan	Diesel	2.0	SUV	136	£34,180
		SEAT	Ateca	Petrol	1.0	SUV	138	£27,330
		Vauxhall	Grandland	Petrol	1.2	SUV	139	£29,620
		Dacia	Duster	Petrol	1.0	SUV	140	£17,295
		Skoda	Superb	Petrol	1.5	Family	141	£31,235
		Alfa Romeo	Tonale	Hybrid	1.5	SUV	142	£38,620
		Nissan	Quashqai	Petrol	1.3	SUV	143	£27,120
		Audi	A5	Petrol	2.0	Executive	144	£41,870
		Ford	Galaxy	Petrol	2.5	MPV	148	£40,725

5	151 to 255g/km	Make	Model	Fuel / Engine Type	Engine size	Car Type	CO2 (g/km)	Approx Price
		Mazda	CX5	Petrol	2.0	SUV	156	£33,035
		Skoda	Superb	Petrol	2.0	Family	163	£36,590
		Audi	A6	Petrol	2.0	Executive	163	£43,965
		VW	Golf	Petrol	2.0	Family	165	£36,320
		BMW	X3	Petrol	2.0	SUV	173	£42,795
		Lexus	LS	Hybrid	3.5	Executive	176	£89,175
		Ford	Focus	Petrol	2.3	Family	183	£37,650
		Alfa Romeo	Stevio	Petrol	2.0	SUV	192	£49,740
		Cupra	Formentor	Petrol	2.0	Sports	193	£43,125
		Volvo	XC90	Petrol	2.0	SUV	197	£62,140
		Audi	A8	Petrol	3.0	Luxury	206	£80,130
		Ford	Tourneo	Diesel	2.0	MPV	213	£59,065
		Genesis	GV80	Petrol	2.5	Luxury	241	£60,125
		VW	Amarok	Diesel	2.0	Pickup	246	£40,791
		Jeep	Wrangler	Diesel	2.0	SUV	250	£60,285

6	Over 256g/km	Make	Model	Fuel / Engine Type	Engine size	Car Type	CO ₂ (g/km)	Approx Price
		BMW	X5	Petrol	4.4	SUV	262	£90,710
		Lexus	LC	Petrol	5.0	Luxury	262	£95,660
		McLaren	GT	Petrol	4.0	Sports	270	£167,560
		Land Rover	Range Rover	Petrol	4.4	Luxury	270	£168,500
		Chevrolet	Corvette	Petrol	6.2	Sports	277	£92,890
		Porsche	Cayenne	Petrol	4.0	SUV	282	£84,400
		Aston Martin	DBS	Petrol	5.2	Luxury	306	£252,700
		Land Rover	Defender	Petrol	5.0	SUV	320	£108,885
		Lamborghini	Huracan	Petrol	5.2	Luxury	330	£168,177
		Rolls Royce	Ghost	Petrol	6.6	Luxury	347	£272,800

The Council's scheme is designed to encourage good choices when buying future vehicles and it is worth noting that drivers often can drastically change their emissions through only minor changes as to which model of a particular car they buy. The following table shows how much variety there can be within individual ranges of vehicles. Once again this data was sourced via AutoExpress and is correct at the time of publishing the report.

Make	Car	Model	Car Type	Fuel Type	Engine size	CO ₂ (g/Km)	0-60 mph	MPG	Price	Band
Audi	A3	35 TFSI Auto Sport	Family	Petrol	1.5	127	8.4	47.1	£30,700	3
Audi	A3	40 TFSI e Auto Sport	Family	PHEV	1.4	25	7.6	282.5	£35,910	2
BMW	3 Series	320i Sport	Exec	Petrol	2.0	145	7.4	44.1	£39,605	4
BMW	3 Series	330e Sport	Exec	PHEV	2.0	30	5.8	217.3	£46,285	2
DS	4	Auto Perf Line +	Family	Petrol	1.2	138	10.4	48.6	£33,555	4
DS	4	E-Tense Auto Perf Line +	Family	PHEV	1.6	28	7.7	232.3	£41,650	2
Fiat	500	Top	City	Petrol	1.0	114	13.8	56.5	£18,290	3
Fiat	500	EV	City	EV	NA	0	9	NA	£28,195	1
Ford	Kuga	Ecoboost ST-Line	SUV	Petrol	1.5	150	9.7	42.8	£34,480	4
Ford	Kuga	FHEV ST-Line	SUV	Hybrid	2.5	125	9.1	51.4	£38,025	3
Ford	Kuga	PHEV ST-Line	SUV	PHEV	2.5	23	9.2	282.5	£37,555	2
Kia	C'eed	2	Family	Petrol	1.5	125	8.4	51.4	£22,565	3
Kia	Niro	2	Family	Hybrid	1.6	100	10.4	64.2	£26,990	3
Kia	Niro	2	Family	PHEV	1.6	18	9.6	353.1	£34,075	2
Kia	Niro	2	Family	EV	NA	0	7.8	NA	£37,295	1
Land Rover	Discovery Sport	Dynamic HSE	SUV	Petrol	2.0	209	7.3	30.7	£54,015	5
Land Rover	Discovery Sport	R- Dynamic HSE	SUV	PHEV	1.5	36	6.2	181.1	£57,850	2
Land Rover	Range Rover	Autobiography	Luxury	Petrol	4.4	264	4.4	24.3	£139,600	6
Land Rover	Range Rover	Autobiography	Luxury	PHEV	3	18	5.5	368	£134,810	2
Lexus	RX	Premium	SUV	Hybrid	2.5	150	7.9	44.1	£62,125	4
Lexus	RX	Premium	SUV	PHEV	2.5	25	6.5	257	£67,100	2
Lexus	RZ	Premium	SUV	EV	NA	0	5.6	NA	£64,500	1
Vauxhall	Corsa	Design	Supermini	Petrol	1.2	117	9.3	52.3	£20,525	3
Vauxhall	Corsa	Design	Supermini	EV	NA	0	8.9	NA	£32,390	1
VW	Golf	Auto Style	Family	Petrol	1.5	128	8.5	49.6	£31,660	3
VW	Golf	Auto Style	Family	PHEV	1.4	21	7.4	313.9	£36,660	2

NB: For individual Cabinet Member reports only

For completion by the **Cabinet Member for City Management and Air Quality**

Declaration of Interest

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

Signed: _____ Date: _____

NAME: **Paul Dimoldenberg**

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

'Emissions-Based Charging' and reject any alternative options which are referred to but not recommended.

Signed: _____

Cabinet Member for City Management and Air Quality

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.

Additional comment:

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 Director of Law, City Treasurer and, if there are resources implications, the Director of People Services (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.