

DELEGATED AUTHORITY CONSULTATION REPORT 8056

TRAFFIC ORDERS – TARIFF AND PERMIT PRICING RESTRUCTURE

INTRODUCTION OF EMISSIONS-BASED CHARGING, AMENDMENTS TO PARKING CHARGES, AND CHARGES FOR ADDITIONAL RESIDENTS' PERMITS

Background

The City of Westminster has some of the highest carbon emissions and worst air quality of any national local authority. Therefore, the City Council proposes to introduce emissions-based charging for both pay-to-park casual kerbside parking and residents' parking permits to deliver more local positive impacts through the provision of discounts for 'cleaner', less polluting vehicles. The payment structure will use 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).

Emissions-based charging uses DVLA data. Where CO₂ data is not held, such as for vehicles registered before 2001 or for vehicles not registered in the UK, separate charges will be levied.

The implementation of an emissions-based charging scheme for residents' permits necessitates the replacement of the current policy allowing up to two vehicle registration marks (VRMs) on a single permit policy with a new policy 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 introduction of an incremental surcharge per additional permit. This would apply to new applications and any permit renewals. Second permits would be charged an additional £50 on top of the price of the permit and third permits an additional £100.

The proposals for both the pay-to-park and residents' permit schemes align with the Fairer Westminster strategy and complement a number of corporate environmental policies, strategies and commitments 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 City Council and these policies support this aspiration.

Appendices

- Appendix A City Council's Responses to Commonly Cited Concerns
- Appendix B Responses to Consultation

Consultation Results

Following the publication / posting of press and street notices between 24th January 2024 and 14th February 2024 and consultation with frontagers and other key parties on the proposed measures, responses from 371 individuals or groups were received, as detailed in Appendix A to this report. The extent of the email / letter consultation included 53 Ward Councillors, 67 local residents' associations, and 63 statutory bodies / representatives.

In addition, an email was sent to all permit holders and a text message was sent to every RingGo user who had used their service to park in the City in the last three months advising them of the proposals and how to make comment. Press notices were placed in the local newspaper and the London Gazette and the City Council has published a news article and updates to the Parking section on its web site.

While a breadth of comments and concerns were received as a result of the consultation, the 371 responses largely fall into four groups:

Position	Number of responses	
Neither opposed nor supportive, OR solely asking questions to gain a clearer understanding of the proposals	8	2.2%
Supportive in all respects	7	1.9%
Largely supportive but suggesting revisions to proposals	15	4.0%
Mostly expressing concerns or opposed	341	91.9%

Concerns cited by more than 5% of respondents

Concern	% of respondents	Section in Appendix A
The proposals are about raising revenue rather than protecting the environment.	29.0%	8A
The incentive to switch to an electric vehicle will be greatly reduced by the proposals / drivers are considering reverting to petrol / diesel as a result of removal of concessions for electric vehicles and / or increase in charges.	27.1%	7D
A sense of being cheated / betrayed by the City Council after switching to an electric vehicle because of the offered parking concessions only to have them withdrawn.	14.6%	7E
Electric vehicles produce zero CO2 emissions so do not understand why these proposals seek to penalise owners.	14.6%	7A
The proposed increase in permit charges is unreasonable / excessive / not in line with inflation.	14.6%	3C
Suggested alternative methods for setting charges, e.g. vehicle size, mileage, affordability, Euro 6 or ULEZ compliance, MOT emissions test.	13.0%	7I

The increased charges / cost of purchasing an electric vehicle disproportionately hits people on lower incomes.	12.0%	3A
The proposals do not consider the cumulative effects of the increased charges during the current Cost-of-Living crisis.	10.6%	3E
How does a <u>parked</u> vehicle impact CO2 levels? A <u>movement</u> -based scheme, such as ULEZ, is more appropriate.	10.1%	7B
The proposals impact people on low incomes and other people who are dependent on their vehicle for work / shifts / mobility / healthcare / visiting family, etc., especially where practical alternatives do not exist.	10.1%	3B
Querying evidence / scientific basis for proposals / conflation of CO2 with pollution / measurable outcomes.	8.8%	11A
Already pay road tax / Congestion Charge / ULEZ charge based on vehicle's emissions level.	8.8%	7L
The public have received short notice of the planned implementation date of the proposed charges and cannot make alternative plans in this time.	7.7%	8E(b)
The proposed increase in pay-to-park charges is unreasonable / excessive / not in line with inflation.	7.7%	3D
The City Council should focus more on other issues that cause congestion and add to pollution like cycle lanes, 20mph zones, Low Traffic Neighbourhoods, construction works, etc.	7.7%	10B
Punitive pay-to-park charges have had / will have negative effects on local businesses.	6.9%	12A
The proposals do not take into account the contrast between low and high mileage use of vehicles. See also 7I above.	6.9%	7C
Westminster has insufficient recharging points to make the switch to an electric vehicle viable.	6.6%	6A
The proposed changes are being introduced too soon; permits should remain free for a longer period to encourage more people to switch to electric vehicles; people should be allowed more time to save for an electric vehicle. See also 8E(b) above.	5.6%	5F

Recommendation

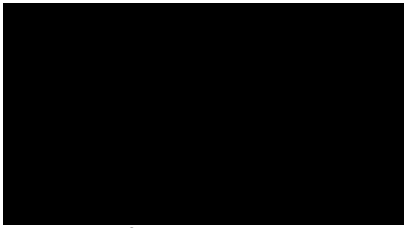
Following consideration of the responses received to the consultation, it is recommended that:

- (a) the amendments to the pay-to-park charging mechanism are brought into force with effect from 8th April 2024;
- (b) the amendments to residents' permit charging mechanism are brought into force with effect from 3rd June 2024; and

with the exception of the above split operational dates, the Traffic Orders are made as proposed.

I agree / disagree with the recommendation.

Signed



Date

26/03/2024

Head of Parking
City Highways, Environment, Climate & Public Protection

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS

Item	Theme	Concern	Response
0A	General	What is the rationale for these changes?	<p>The proposed measures aim to encourage the use of low-polluting vehicles and discourage the use of those that are more polluting.</p> <p>The schemes aim to encourage those who park regularly in Westminster to think about their choices regarding vehicle use and ownership in terms of the type of vehicles they own and how polluting they are. Central London has had traditionally high levels of pollution.</p> <p>The cheapest charges in each of Westminster's parking zones will be lower than in the London Boroughs of Brent, Camden, Hammersmith & Fulham and in the City of London.</p>
1B	Queries	<p>(a) Can Westminster invest more in research to develop more evidence-based policies. Where I live useful role of St. John's Wood Society expert monitoring of PM10 and PM2.5 around schools. https://www.stjohnswoodsociety.org.uk/air-quality</p> <p>(b) Issues of equality and equity amongst impacted business drivers are important, and probably not easy to address. For example, critical workers who need their vans and other professional equipment to roll out services in our boroughs. However, that should not be an excuse to scupper the scheme, but rather to study solutions with business associations: scrappage and affordable replacement schemes, access to leasing?</p>	<p>(a) The City Council has both Air Quality and Climate Emergency Teams. These colleagues are working to integrate various departmental policies into our wider corporate goals regarding the health of our residents and minimising our impact on the planet. Wherever possible they are working to ensure empirical rigour to the process.</p> <p>(b) The City Council is very much aware of the impacts on vulnerable groups or those dependent on the use of their vehicles. A full EQIA was undertaken as part of the decision-making process. We are pleased to note that the EV market is maturing with a growing range of vehicles and a developing second-hand market. The comments on future options to support business are noted and have been communicated to the relevant teams.</p>
2B	Support	Concept sound but residents' permit banding needs	

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response																				
		<p>adjustments:</p> <p>(a) The gap in the charges between Group 1A and Group 1B is too large, while that between Group 1B and Group 2 is too small. Suggested that the permit charges for Group 1B are reduced, even if only for a few years, and then gradually increased.</p> <p>(b) Band 5 for residents’ permits is too wide and unfair on those vehicles that are significantly better than others. It would seem that the gov site has the following bands and for continuity, surely it would be better to follow the same system? Not necessarily matching all of the government bands; but 151- 170 would seem logical and will help many who have better; but slightly older cars that don’t fall into the lower bands.</p> <table border="0" data-bbox="510 1161 943 1342"> <tr> <td>150 to 154</td> <td>—</td> <td>36</td> <td>36</td> </tr> <tr> <td>155 to 159</td> <td>—</td> <td>37</td> <td>37</td> </tr> <tr> <td>160 to 164</td> <td>—</td> <td>37</td> <td>37</td> </tr> <tr> <td>165 to 169</td> <td>—</td> <td>37</td> <td>37</td> </tr> <tr> <td>170 and above</td> <td>—</td> <td>37</td> <td>37</td> </tr> </table>	150 to 154	—	36	36	155 to 159	—	37	37	160 to 164	—	37	37	165 to 169	—	37	37	170 and above	—	37	37	<p>(a) The split between band 1A and 1B in the resident permit scheme is explained within para 7.2.1 in the Nov 2023 Report. The Council are of the opinion that the various splits are fair and proportionate and are designed to ‘nudge’ drivers in terms of decision-making about vehicle ownership and usage. Unless it became necessary, the Council would be reluctant to amend the thresholds once such a scheme is introduced as to do this may prove confusing for residents and may cause consternation. Instead, the Council would look to affect demand and usage through respective pricing of the various bands.</p> <p>(b) The proposed banding is explained in paras 7.2 to 7.6 in the Nov 2023 Report. The tables alongside paras 7.1 and 7.6 show the percentage of current permit holders’ vehicles that would slot into each band. Whilst band 5 would include 31.7% of these, which is the highest percentage for any band, this is consistent with the aims of the scheme, which is to ‘nudge’ drivers in terms of decision-making about vehicle ownership and usage. For the same reason, the other two middling bands, bands 3 and 4, together contain 41.1% of current vehicles. In terms of the highest band, band 6, para 7.11 of the Report explains that in order to consolidate the aspirations of the scheme 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.</p>
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Item	Theme	Concern	Response
		<p>On the other hand, it makes sense to put the higher band to a higher price, so anything over that is £500. Most with the most polluting cars don't really seem to be constrained by the cost, so this may encourage a change.</p> <p>(c) £320 for the most polluting and biggest vehicles is too cheap. Keep in mind that such vehicles cost easily £70,000 – 100,000 in the purchase, £1,500 per year insurance, easily £2000 – 3000 annual maintenance. Why should parking cost so little? Suggest go much steeper on large cars and such cars with high emissions. Maybe one could start with your proposed scale and add 15% every year for the next 10 years or so.</p>	<p>(c) The Council has proposed charges that it considers are fair and proportionate for the introduction of an emissions-based charging scheme. In terms of the highest, band 6 charges, the Nov 2023 Report advises under para 7.11 that in order to consolidate the aspirations of the scheme going forward, the Council would look to top load any future charging increases to the higher, more polluting, bands as part of its annual fees and charges reviews.</p>
2C	Support	<p>Concept sound but pay-to-park banding needs adjustments</p> <p>The gap in the charges between EVs and non-EVs is too small – the charge for EVs should be lower.</p>	<p>We have traditionally heavily discounted charges for EV and 'eco' vehicles (for permits and pay-to-park) but now feel that due to the sharp increase in uptake of electric and hybrid vehicles, a tipping point has been reached whereby such charges have become unsustainable. The Council feels all vehicles should pay for their parking as otherwise we are continuing to overly encourage private car use over more the sustainable modes of transport mentioned above. No other local authority in central London offers such nominal parking charges which overly encourage driving into/around their borough. Whilst EVs are of course less polluting than petrol or diesel vehicles, their use still contributes to congestion and they still produce some degree of harmful pollutants such as particulate matter from tyre wear and brake pad wear.</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
			<p>Although we of course wish to encourage the use of EVs over more polluting fuel types, hence the proposed charging structure, in the interest of air quality and the commitment the City Council has made to improving this, we still need to ultimately encourage journeys, wherever possible, to be made by the most sustainable modes of transport.</p>
2E	Support	<p>Concept sound but adjustments needed to execution (e.g. based on size / cost):</p> <p>(a) The surcharge for additional residents’ permits should be much higher, e.g. £250 for the third vehicle.</p> <p>(b) Size of vehicle – see 7I(a)</p> <p>(c) Can the Council charge more to those fume-producing delivery vehicles and also the number of non-elective buses? Those who are driving around (deliveries, etc.) should be addressed too as a solution to the problem.</p>	<p>(a) In formulating the second and third resident permit charges we have attempted to be fair and proportionate whilst still incorporating some degree of demand management into the pricing. All parking charges are subject to regular review and the number of residents who take up the option of a third permit will be closely monitored. If this policy results in issues in terms of the availability of space, pricing can be something we use to affect demand going forward.</p> <p>(b) see 7I(a) below.</p> <p>(c) Our proposed scheme is a parking scheme. Delivery vehicles are generally exempt from parking charges when loading/unloading and actively delivering. When/if parking they will be charged as per their emission level banding. Other Council initiatives are looking to address the issue of delivery vehicles, such as encouraging consolidated deliveries and bookable loading bays for electric vehicles that</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		<p>(d) I suggest that the emissions-based tariff differentials start smart and then increase over time, with the expectation of rising pricing well publicised. That will give owners of polluting cars time to adjust, should they wish to avoid increasing charges. It will also send an important signal, hopefully one that will be copied by local authorities across London and beyond.</p> <p>(e)(i) I don't think that the amount that you are charging for electric vehicles is anywhere near high enough. Any sort of conventional SUV is going to be in the highest band (band 5), yet the damage done to the roads by the equivalent electric vehicle and the particulate pollution from the tyres of such vehicles (which are nearly twice as heavy as a standard SUV), means that they should be charged at least as highly as a standard SUV.</p> <p>(ii) I would support a policy similar to that recently introduced in Paris to reduce the number of SUVs, which are too big for London, often block roads and are polluting. The Westminster proposals should include a hefty excess charge for SUVs and for the</p>	<p>are currently being trialled in Russell Street and Abbey Orchard Street. Buses, which of course carry multiple passengers who are then not individually causing pollution and congestion by their chosen mode of transport, are outside of the scope of this scheme.</p> <p>(d) Our current charging structures do not fully reflect the Council's Fairer Environment aspirations and the charging structure are unsustainable with the rapid growth of electric vehicles. The emissions-based charging schemes are designed to help future-proof the service against this as the banded charges can be periodically reviewed and amended as appropriate.</p> <p>(e) The May 2023 Report acknowledges the issue of particulate matter and advises that the Council would ideally like to be taking a more holistic approach to its kerbside and resident permit charging by considering a vehicle's Euro Standards classification alongside its levels of CO2 and NOx tailpipe emissions and particulate matter (PM) emissions, unfortunately, Euro Standards, NOx and PM data is not yet obtainable as standard from the DVLA, hence the focus on CO2. However, the differentiation between the charges low and high battery sizes for EVs in the resident permit scheme proposal does try to account in part for this.</p> <p>The comments about Paris and SUVs are noted. Under our proposed schemes propose, the most polluting vehicles will be charged the most.</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		<p>worst polluting cars. Without a deterrent the drivers of these cars, which have a detrimental effect on all of us, will continue to pollute London and make the air dangerous to breathe.</p> <p>(iii) SUVs are bigger and heavier cars and are quite simply incompatible with our goal of reducing global emissions as well as improving our air quality. The majority of SUVs are petrol-powered and consume about 20 per cent more fuel than the average car. Even if the car is electric or part electric the same sums apply as heavier cars require more energy. Bigger cars don't just emit more, their tyres produce more particulate pollution as well. They also take up more parking space as any pedestrian and cyclists can tell you. And, to make matters worse, SUVs cause significantly more pedestrian fatalities than other cars. So the case for additional parking charging for SUVs is pretty clear cut.</p> <p>(f) Probably the policy does not go far enough as other detrimental aspects of car usage and parking occupancy could be taken into account.</p> <p>(g) The City Council should raise awareness of the Mayor of London's scrappage scheme and introduce a</p>	<p>(f) The City Council acknowledges the issue of NOx tailpipe emissions and particulate matter (PM) emissions and would ideally like to be taking a more holistic approach to its kerbside and resident permit charging by considering such factors. Unfortunately, this data is not yet obtainable as standard from the DVLA, hence the focus on CO2. See also 71(a) below with regards to vehicle size.</p> <p>(g) The City Council can raise awareness of the Mayor's scrappage scheme. There would though be little value in</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		<p>supplementary scrappage scheme to make environmentally friendly vehicles more affordable.</p> <p>(h) The City Council should incentivise residents to give up high-polluting vehicles by offering travel passes, car club memberships or affordable bike buying or hire schemes. In so doing, the City Council will be supporting resident’s move to more environmentally friendly travel options and enabling residents to save towards environmentally friendly vehicles.</p> <p>(i) The Council should redouble its efforts to check that only bona-fide residents are able to apply for one, two and three permits at the same address. Otherwise, we fear that the scheme could encourage a doubling (or more perhaps) of total demand for resident parking permits in some places.</p> <p>(j) Clean Air London urges the Council to go much further and faster and signal a phasing out of all fossil-fuel emissions in resident and pay parking spaces in the City of Westminster by 2030.</p>	<p>introducing another, of our own.</p> <p>(h) The City Council is encouraging the use of cycling and walking through various highway improvements being introduced across the City, such as pavement widening, cycle lanes, junction improvements, and on-street hangers for secure storage. The Council have recently approved the introduction of a small loan scheme for the purchase of bikes by residents. The Council has for many years worked with various car-share companies to provide kerbside car-share access and we continue to look to expand this as the market matures.</p> <p>(i) Resident permits are only issued where applicants can evidence that they meet the criteria for a permit. Please also see Comment 5B below.</p> <p>(j) The primary objective of the scheme is to discourage use and ownership of older and more polluting vehicles. Low-cost alternatives to car ownership and use exist and are common in Westminster, so we would encourage use of these, namely public transport, cycling, walking and WCC Car Clubs. However, whilst your comments about Clean Air London are noted, in the introduction of emissions-based charging we have tried to be reasonable and proportionate.</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
3A	Cost Concerns	<p>(a) Increased charges and the cost of a new EV disproportionately hits lower income groups (LIGs) / those who may be more likely to have older vehicles (examples include the elderly, unpaid carer of disabled family members who cannot use public transport). Given the EQIA also identifies this as a concern, why can the Council not consider concession for LIGs or phase the introduction to allow those in LIGs more time to prepare / adapt to the potential costs?</p> <p>(b) The emissions-based charging system, particularly for vehicles registered before 2001 or those not registered in the UK, could lead to exclusionary practices. It penalizes owners of older vehicles who may not have access to CO2 data, potentially affecting individuals with limited financial means who rely on older vehicles.</p>	<p>(a) It is true that the EQIA highlighted low-income groups (LIGs) as a characteristic that could be impacted disproportionately by our proposals. However, although LIGs are considered within WCC’s EQIAs they are not a protected characteristic as defined by the Equalities Act 2010. This issue is admittedly difficult to mitigate as the whole point of the proposals is to discourage use and ownership of older and more polluting vehicles. Low-cost alternatives to car ownership and use exist and are common in Westminster, so we would encourage use of these, namely public transport, cycling, walking and WCC Car Clubs.</p> <p>There is no practical way that we could introduce a means-tested parking concession relating to low income.</p> <p>In terms of the reference to unpaid carers of disabled family members, a disabled badge affords the holder various parking concessions. The badge can therefore be legally displayed in a vehicle whilst being used to transport the badge holder around.</p> <p>(b) To operate the proposed emissions-based charging schemes, we are reliant on accurate and up-to-date DVLA information. The DVLA do not hold emissions data for pre-2001 vehicles (of which there are a low and dwindling amount still on-street) and for this reason we have placed them in the middling bands, based on their engine capacity.</p> <p>In terms of foreign vehicles, a foreign registered vehicle can be used in the UK for six months if it is fully taxed in its home</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
			<p>country. After this, the vehicle must be registered with the DVLA. In the meantime, or for those that will remain for less than 6 months, there is no practical way in which we can ascertain which band they should correctly be placed into. Our policy, which is commonplace for such schemes, is that a no return from the DVLA look-up will result in the full charge being levied. Any possible over-payment can then be addressed retrospectively.</p>
3B	Cost Concerns	<p>LIGs <u>and other people</u> may be more dependent on existing vehicles for work / shifts / mobility / healthcare / visiting family outside London (especially where there is no easy public transport access). In the latter case this includes those with health / infirmity issues and those with very young children where public transport is considered impractical (please see 6A).</p>	<p>In formulating the emissions-based charging policy, an Equalities Impact Assessment (EQIA) was carried out to identify how people with protected characteristics may be impacted by the proposed schemes. The EQIA summarised that there could potentially be a disproportionate impact upon disabled people and people on low incomes. In terms of mitigation, 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 it is acknowledged that these may not always be practical or appropriate in some cases. 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 afforded to disabled Blue Badge holders, meaning</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
			<p>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.</p>
3C	Cost Concerns	Increase in permit costs is unreasonable / excessive / considerably above inflation	<p>Under the new proposed scheme, the cheapest charges in each of Westminster’s parking zones will be lower than Brent, Camden, City of London, Hammersmith. For resident permits, ‘eco’ permits are currently free of charge. As the EV charges are increasing from an extremely low base, it is inevitable that any change to fit the aims of the new scheme would result in a large percentage increase.</p> <p>Electric vehicles (EVs) and other cleaner, less polluting vehicles are becoming more popular, commonplace and widespread: a trend that is expected to continue and accelerate. This will render the council’s current pay-to-park and resident permit schemes’ charging structures unsustainable.</p>
3D	Cost Concerns	(a) Increase in pay-to-park costs is unreasonable / excessive / vs inflation.	<p>(a) Under the new proposed scheme, the cheapest charges in each of Westminster’s parking zones will be lower than Brent, Camden, City of London, Hammersmith. For pay-to-park, charges for EV and plug-in hybrid vehicles are currently extremely low (from 8p an hour in Paddington to just 24p an hour in the West End) as to be virtually nominal. Until 2017, these vehicle types were granted free parking at pay-to-park bays in Westminster.</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response																		
		<p>(b) The jumps in pay-to-park charges will simply be passed on from tradespeople to their clients adding to household costs even for those who make no personal contribution to CO2 emissions. This is unfair.</p>	<p>Electric vehicles (EVs) and other cleaner, less polluting vehicles are becoming more popular, commonplace and widespread: a trend that is expected to continue and accelerate. This will render the council's current pay-to-park and resident permit schemes' charging structures unsustainable.</p> <p>(b) As highlighted in para 6.7 of the Nov 2023 Report, even with the introduction of emissions-based charging, the Council will continue to operate its Trades Permit scheme. Trades permit prices will not be based upon emissions levels but remain the cost of ten hour's parking in each respective zone at its base rate, as follows. A Trades Permit allows the holder to park in pay-to-park, shared-use or resident bays.</p> <table border="1" data-bbox="1413 804 1870 1219"> <thead> <tr> <th>Zone</th> <th>Trade Permit Charge</th> </tr> </thead> <tbody> <tr> <td>A</td> <td>£45.50</td> </tr> <tr> <td>B</td> <td>£36.90</td> </tr> <tr> <td>C</td> <td>£20.90</td> </tr> <tr> <td>D</td> <td>£30.50</td> </tr> <tr> <td>E</td> <td>£63.00</td> </tr> <tr> <td>F</td> <td>£66.00</td> </tr> <tr> <td>G</td> <td>£66.00</td> </tr> <tr> <td></td> <td></td> </tr> </tbody> </table>	Zone	Trade Permit Charge	A	£45.50	B	£36.90	C	£20.90	D	£30.50	E	£63.00	F	£66.00	G	£66.00		
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<p>(c) Please do not change the tariff by such a massive amount. Make it £2 for 4 hours, that's over 100% of the existing tariff.</p>	<p>(c) Please see Comment 3E below.</p>																				

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
3E	Cost Concerns	Scheme does not consider the Cost-of-Living crisis and whether the increases in parking charges are affordable to different families on top of the many other increases in living costs.	<p>The primary objective of the scheme is to discourage use and ownership of older and more polluting vehicles. Low-cost alternatives to car ownership and use exist and are common in Westminster, so we would encourage use of these, namely public transport, cycling, walking and WCC Car Clubs.</p> <p>Although some drivers will be paying more to park in Westminster under the proposed schemes, this is not the case for all. As illustrated in the November 2023 Cabinet Member Report (Appendix E) [https://westminster.moderngov.co.uk/ieDecisionDetails.aspx?ID=1974], the charges quoted are not out of line with parking charges in other central London boroughs such as Camden, Kensington & Chelsea and Islington.</p>
3F	Cost Concerns	The proposals do not consider the cost of replacement batteries.	The cost of replacement batteries varies on the make and model of the vehicle; therefore, the City Council cannot comment. However, motorists should factor costs into the upkeep and running of any vehicle when considering its purchase.
4A	System Complexity	New system is difficult to understand compared to old system	<p>Charges will be indicated online and in WCC’s literature regarding the scheme, but due to practical reasons will no longer be quoted on the bay signage.</p> <p>Motorists can calculate the charges they will pay by reference to our table of charges alongside their vehicle’s CO2 emission levels, fuel type and year of manufacture information which can be found either on the vehicle’s V5 documentation or via the DVLA’s online vehicle checker</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
			<p>https://www.gov.uk/get-vehicle-information-from-dvla. The vehicle’s CO2 emissions level will ascertain the banding, and the year of manufacture and fuel type info will ascertain whether the diesel surcharge is payable (if a pre-2015 diesel). Due to DVLA information limitations, the banding for a vehicle manufactured pre-2001 will be determined by its engine capacity (cc).</p> <p>We can look into the possibility of providing a webform or some sort of web-based functionality on the WCC website to help motorists calculate their vehicle’s banding and charges, although this would not be available upon go-live.</p>
4B	System Complexity	<p>(a) How can new charges be clearly communicated to pay-by-phone users pulling up at a bay?</p> <p>(b) How are you going to put in place the pricing by emissions for pay-to-park? On what platform? How</p>	<p>(a) We have traditionally advertised pay-to-park tariffs on-street on kerbside signage. However, the emissions-based 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 so, 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.</p> <p>(b) The emissions-based charging will operate on the RingGo system as our current system does and has done for</p>

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Item	Theme	Concern	Response
		<p>are you going to manage the car data? Who will be managing it? You are also excluding those who do not have a smart phone and/or credit/debit card from parking in London. Have you done an equality impact assessment on the proposals? Have you done a data impact assessment? Are you expecting everyone who wants to park in central London have a further app to be able to do so?</p>	<p>a number of years. The vehicle data will be obtainable from the DVLA via look-up functionality. The pay-to-park system can be used via app, SMS or phone, and as an alternative, motorists may continue to use Parking Cards which are available from Westminster libraries. In terms of the basic functionality of the service, nothing is changing and personal data will continue to be safeguarded in line with GDPR stipulations as outlined in our Privacy Notice https://www.westminster.gov.uk/parking/parking-privacy-notice.</p> <p>An Equalities Impact Assessment was appended to the November 2023 Report.</p>
5A	Residents’ Permits	<p>New residents’ permit cap (3 per person) encourages car ownership compared to the existing regime which only allowed 1 car on the street at any one time for each person. This will result in an overall increase in pollution.</p>	<p>Whilst this policy could result in three vehicles being parked on-street simultaneously in some circumstances, by charging for each permit, and then applying a surcharge for the second and third, we anticipate individuals’ uptake of the three-permit maximum to be low.</p>
5B	Residents’ Permits	<p>New residents’ permit cap (3 per person) adds to existing competition for spaces.</p>	<p>Whilst this policy could add to existing competition for spaces in some circumstances and in some locations, by charging for each permit, and then applying a surcharge for the second and third, we anticipate individuals’ uptake of the three-permit maximum to be low.</p>
5C	Residents’ Permits	<p>(a) New residents’ permit cap (3) favours and will not deter those with more disposable income who will now be able to park more cars on the street than under the existing regime, also reducing availability of parking spaces. Original scheme is, therefore, more</p>	<p>(a) Whilst this policy could add to existing competition for spaces in some circumstances and in some locations, by charging for each permit, and then applying a surcharge for the second and third, we anticipate individuals’ uptake of the three-permit maximum to be low. However, the point is</p>

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Item	Theme	Concern	Response
		<p>suitable for discouraging vehicle use.</p> <p>(b) The new residents’ permit cap will mean that people with lots of money and more than one vehicle will have a permanent parking spot - moving one vehicle in and one out continuously, so there will no longer be times they’re not taking a space - which gives others parking opportunities, because they can’t drive two or three vehicles at the same time, plus they’ll taking up an additional spot with the second or third vehicle in a recognised SPA!</p>	<p>noted.</p> <p>(b) See Comment 5C(a) above.</p>
5D	Residents’ Permits	<p>Scrapping of existing “two vehicles per policy” is punitive:</p> <p>(a) for motorcycle owners, now £110.99 for a motorcycle permit;</p>	<p>(a) Under our emissions-based charging proposal, a resident permit for a motorcycle would cost £60.99 per annum. As well as enabling the motorcycle to park in any resident bay throughout the holder’s zone of residence, the permit also enables parking in any solo motorcycle bay city-wide at no extra cost. A second resident permit for the same resident for another motorcycle would cost £110.99 with the same concessions applying. Under the current terms and conditions of our resident permit scheme, where two VRMs are listed on the same permit, only one should be parked on-street at any given time. This particular stipulation is being withdrawn under emissions-based charging but to discourage take up of second and third permit options, additional charges are being applied to reflect the allowance for both vehicles to be parked on-street simultaneously. The Council</p>

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Item	Theme	Concern	Response
		<p>(b) hitting families with specific transport needs.</p> <p>(c) It is unfair to treat a moped as a second vehicle requiring a separate permit. A car and a moped can't be driven at the same time, so it doesn't make sense to charge an additional premium for a second permit.</p>	<p>does not consider the additional charge(s) to be 'punitive'.</p> <p>(b) Likewise, the Council does not consider the additional charges for second and third resident permits to be punitive for families with specific transport needs. As above, the new policy allows both vehicles to be parked on-street simultaneously and the additional charges reflect this.</p> <p>(c) The proposals relate to charges for parking and the CO2 emissions level of each vehicle. While the owner of a car and moped could not drive them both at the same time, they could be left parked on the street at the same time and this scheme is for parking charges rather than the movement of those vehicles through the City. In addition, the individual permit charges will reflect the individual CO2 emission levels of each vehicle.</p>
5E	Residents' Permits	<p>Querying banding structure for residents' permits</p> <p>(a) Would it not be possible to create a band just for fully electric vehicles as an alternative to applying charges to them?</p>	<p>(a) The objective of the emissions-based charging schemes is to discourage use and ownership of older and more polluting vehicles. Low-cost alternatives to car ownership and use exist and are common in Westminster, so we would encourage use of these, namely public transport, cycling, walking and WCC Car Clubs.</p> <p>We have traditionally heavily discounted charges for EV and 'eco' vehicles (for permits and pay-to-park) but now feel that due to the sharp increase in uptake of electric and hybrid vehicles, a tipping point has been reached whereby such</p>

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Item	Theme	Concern	Response
		<p>(b) The current grouping or split of the 13 DVLA categories into 6 “groups” for residents parking has some incredibly perverse incentives/results: For example, 8 smaller city or super mini cars will fall within Group 3 including a Toyota Yaris Hybrid (with 92 g/km CO₂), although according to the Government’s VCA data it is 75. This means an increase from £0 to £123.05 (i.e. a 123+% increase) for a supermini car whereas Group 2 contains no less than 9 Luxury/Executive or SUV cars which, when their small electric range is exhausted or not even charged, will emit substantially more from their large petrol hybrid engines than a small Toyota Yaris. And yet they will</p>	<p>charges have become unsustainable. The Council feels all vehicles should pay for their parking as otherwise we are continuing to overly encourage private car use over more the sustainable modes of transport mentioned above. No other local authority in central London offers such nominal parking charges which overly encourage driving into/around their borough. Whilst EVs are of course less polluting than petrol or diesel vehicles, their use still contributes to congestion and they still produce some degree of harmful pollutants such as particulate matter from tyre wear and brake pad wear. Although we of course wish to encourage the use of EVs over more polluting fuel types, hence the proposed charging structure, in the interest of air quality and the commitment the City Council has made to improving this, we still need to ultimately encourage journeys, wherever possible, to be made by the most sustainable modes of transport.</p> <p>(b) As stated, 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 into 6. The table in 7.1 of the November 2023 Cabinet Member report illustrates the current split of resident permitted vehicles. The rationale behind the split is that we have attempted to divide the spread fairly and proportionately, with the larger proportion of vehicles being in the middle bandings. Over time we would expect an increase in lower banded vehicles at the expense of those in the higher bandings as cleaner vehicles are owned and used.</p>

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Item	Theme	Concern	Response
		<p>consistently pay less despite taking up more room in the street, weighing considerably more, and often emitting far more CO2 given the likely wealth of their owners and the likelihood that many will drive having exhausted/not charged their batteries.</p> <p>The costs should be more heavily weighted towards the more polluting vehicles. The banding ends up with a substantial advantage for some of the more polluting vehicles. Bands 3 and 5 have over 25% in each group whereas Band 2 has only 7%. Bands 2 and 3 representing the lower polluting set of vehicles currently owned (including many of the smaller and more affordable city and supermini cars) should be combined and the relative weightings in terms of pricing should be adjusted so that Bands 4 and 5 (as well as U), representing the most polluting vehicles should pay considerably more – as is the case in neighbouring boroughs which have a higher top band. If the purpose is to disincentivise using heavily polluting vehicles it makes no sense to have a differential of only just over £100 between Groups 2 and 5 and even less between Groups 3 and 5.</p> <p>(c) Band 4 has a width of 29g/km but band 5 has a width of 104g/km. Could you please advise me how you have specified the bands?</p> <p>How is this justified for a car which is smaller, lower and narrower than the many SUVs parked near me?</p>	<p>In terms of the charging differentiation between the bands, section 7.11 in the November 2023 report advised that “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”.</p> <p>(c) Please see 5E(b) above. Bands are not based on car size but rather on their CO2 emissions level, which is the focus of the proposed tariff changes. At the lower bands there is a finer differentiation between CO2 emission levels to capture the larger proportion of modern vehicles which have low or medium levels of emissions. However, from 151g/km</p>

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Item	Theme	Concern	Response
		<p>My car is a clean diesel post 2015. Band 4 range is only 29g/km but band 5 range runs from 151-255, i.e. a band width of 104, which means my 156 emission figure just sneaks into the higher very broad band.</p> <p>(d) The proposals unfairly penalise owners of larger cars with CO2 emission figure over 225g/km but were registered before 23 March 2006 which are given special status under existing Government and DVLA Vehicle Tax rates. The new bands for Resident’s Parking Permits suggests a divergence from Government and DVLA Vehicle Tax Bands. The rates for vehicles registered between 1 March 2001 and 31 March 2017 include an arrangement to include cars with a CO2 figure over 225g/km but were registered before 23 March 2006 to pay vehicle tax at Band K level. https://www.gov.uk/vehicle-tax-rate-tables/rates-for-cars-registered-on-or-after-1-march-2001.</p> <p>The proposed bands in the new proposals section at “B2. Proposed Residents’ Permit Charges (All Zones)” should include such an arrangement which could be accommodated by changing the date used for both Band 5 and Band 6 from 2001 to 2006 instead. Or indeed by including the same provision made by DVLA for certain vehicles within the 2001 dates.</p> <p>(e) The charges should start for highly polluted cars only with CO2 or NOx emissions higher than 100g/km.</p>	<p>and above are considered to be a higher emissions level and, therefore, subject to a higher charge. The proposed charges are intended to encourage those in the higher bands to consider switching to a vehicle in a lower band or to use alternative forms of transport where applicable.</p> <p>(d) The City Council’s proposals for emissions-based charging are intended to tackle carbon emissions and air quality in Westminster. While the government has applied a historic concession to vehicles registered before 23 March 2006 with an emissions figure above 225g/km so that they are taxed in Band K (201-225g/km), given the City Council is seeking to reduce emissions, it would be contrary to those aims to give concessions to those vehicles in the upper tiers in respect of their emissions levels.</p> <p>(e) See 7A.</p>

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Item	Theme	Concern	Response
		<p>(f) Given that diesels emit dangerous NO₂ gases, a £50 surcharge, so less than £1 a week, is just not an adequate deterrent.</p>	<p>(f) Comment is noted. Under the emissions-based charging scheme for resident permits, the £50 Diesel Surcharge on top of the relevant permit charge is to cover the heaviest NO_x polluters applies to all pre-2015 diesels in any band. This is not a charge we currently levy within the resident permit scheme. It was considered fairer and more proportionate for this to be a fixed charge for permits rather than the percentage employed in the pay-to-park scheme. As mentioned in para 8.4 of the Nov 2023 Report, charges will continue to be considered annually as part of the Council’s fees and charges reviews.</p>
		<p>(g) The scale is all wrong. The majority of pre-2001 cars of more than 1200cc create far more polluting emissions than my newish car of slightly over 256g/km. Furthermore, there is no premium on diesels, which are certainly more polluting. Your scale of proposed fees seems to me to be almost entirely focused on emissions: it is self-evident that you are charging no more than £40 for the cost of a parking space and the rest of the charge represents a tax on the type of car. This distorts the market for parking permits.</p>	<p>(g) The charging bands are based on CO₂ emissions, where that information is known. As the DVLA does not hold emissions information for vehicles prior to 2001, the City Council has determined that it is reasonable to place such vehicles in Bands 4 and 5 based on their engine size. Diesel vehicles attract a surcharge of £50. The proposed charges for electric vehicles represent the most discounted charges under the proposed emissions-based charging. The charges for non-zero CO₂ emission vehicles then scales up so as to encourage a gradual take up of electric vehicles or other sustainable forms of transport.</p>
		<p>(h) There should be additional higher bands for vehicles of 2000 + cc and higher, SUVs and 4 x 4s.</p>	<p>(h) The Council has proposed charges that it considers are fair and proportionate for the introduction of an emissions-based charging scheme. In terms of the highest, band 6 charges, the Nov 2023 Report advises under para 7.11 that in order to consolidate the aspirations of the scheme going</p>

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Item	Theme	Concern	Response
		<p>(i) Could the City Council differentiate between hybrid and fully electric vehicles in the charging bands?</p> <p>(j) The assertion that the proposed changes aim to introduce a fairer and more proportionate charging structure seems questionable as the multiplier for emissions within Band 3 has not increased proportionately. This sudden and substantial increase in charges for vehicles like mine (from £0) raises questions about the fairness and proportionality of the new scheme.</p> <p>(k) Redistribute the credit generated from taxing Band 1A and Band 1B vehicles to all owners of fossil fuel vehicles. This adjustment would not only maintain</p>	<p>forward, the Council would look to top load any future charging increases to the higher, more polluting, bands as part of its annual fees and charges reviews.</p> <p>(i) The proposed charges centre on the CO2 emissions of vehicles, and to a lesser degree on the emissions from diesel vehicles. Therefore, differentiation between hybrid and fully electric vehicles is not considered appropriate as the determining factor is the emissions level.</p> <p>(j) The pricing is based primarily on vehicles’ CO2 emission levels and has been devised with our main objective in mind, i.e. to discourage use and ownership of older and more polluting vehicles. The pricing has been explained in the November 2023 Report under sections 6 (pay-to-park) and 7 (resident permits). The table in section 7.6 shows how the tiered permit charging structure would affect current resident permit holders. So whilst 3.9% of permit holders who will slot into band 3 will pay more as described, the same band will comprise of 14.9% who currently pay the full price for a permit and who will therefore be paying £42.95 less per year. It is therefore somewhat subjective: although individually there may be some large differences based on individual circumstances, as a whole the Council feels that the charging structure is fair and proportionate.</p> <p>(k) See 7A.</p>

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Item	Theme	Concern	Response
		<p>or potentially increase the financial capital generated by the tax, but also promote a fairer system that aligns with the ethical principles of ecological and public health policies.</p> <p>(l) Although my own vehicle is a common make (Mercedes) and not especially old (2010) the Govt website does not specify the emissions level. It seems wrong to automatically charge it in the highest band, when the emissions might in fact be quite low.</p>	<p>(l) From the DVLA data we have analysed for vehicles that are currently part of our resident permit scheme or who use our pay-to-park scheme, this does not seem to be a widespread or significant issue. Furthermore, discussions with the London Borough of Islington, who have been running a similar emissions-based charging scheme since July 2023, also have not highlighted this as an issue. If data is lacking for a registered vehicle, we would advise that the owner takes this up with the DVLA as this could affect more things than just paying to park in Westminster. Our policy, which is commonplace for such schemes, is that a no return from the DVLA look-up will result in the full charge being levied. Any possible over-payment can then be addressed retrospectively.</p>
5F	Residents' Permits	<p>(a) The introduction of the proposed changes is premature. The current concessions for EVs should remain for a longer period (e.g. 2 to 3 years) to encourage more people to convert. The lead-in time should be longer to allow people time to save / prepare / make alternative provision for the increased charges.</p> <p>The introduction of emissions-based charging is out-</p>	<p>(a) The objective of the emissions-based charging schemes is to discourage use and ownership of older and more polluting vehicles. Low-cost alternatives to car ownership and use exist and are common in Westminster, so we would encourage use of these, namely public transport, cycling, walking and WCC Car Clubs.</p> <p>We have traditionally heavily discounted charges for EV and 'eco' vehicles (for permits and pay-to-park) but now feel that</p>

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		<p>of-phase with removal of Cleaner Vehicle Discount in 2025. EV subsidies are being withdrawn too early. (E.g. Subsidies on home charger installations, discounts on car road tax, BIC rates, TfL clean air discount).</p> <p>(b) May I propose that the change is phased in, beginning with 50% of the new tariff being charged for the next 12 months when the full tariff would be introduced.</p>	<p>due to the sharp increase in uptake of electric and hybrid vehicles, a tipping point has been reached whereby such charges have become unsustainable. The Council feels all vehicles should pay for their parking as otherwise we are continuing to overly encourage private car use over more the sustainable modes of transport mentioned above. No other local authority in central London offers such nominal parking charges which overly encourage driving into/around their borough. Whilst EVs are of course less polluting than petrol or diesel vehicles, their use still contributes to congestion and they still produce some degree of harmful pollutants such as particulate matter from tyre wear and brake pad wear.</p> <p>Although we of course wish to encourage the use of EVs over more polluting fuel types, hence the proposed charging structure, in the interest of air quality and the commitment the City Council has made to improving this, we still need to ultimately encourage journeys, wherever possible, to be made by the most sustainable modes of transport</p> <p>(b) The suggestion to phase in the changes was considered during the policy formulation stage but was rejected due to the reasons outlined above in the answer to 5F(a).</p>
5G	Residents' Permits	Charges for second / third vehicle does not make sense if they are best eco types as opposed to less eco types.	The current resident permit scheme allows an individual to have two vehicles on a single permit. We propose to change this policy so that each vehicle requires its own permit, and we are increasing the allowance by one to three vehicles per individual, but with an additional charge on the second and

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			<p>third permits. There is currently no limit to the number of permits we can issue per household and that policy is not due to change. The additional charge for a second and third permit is to act as a proportional deterrent and is an acknowledgement that additional vehicles take up additional on-street space, sometimes where available space may already at a premium. The emissions levels of different vehicles are reflected in the base cost of the residents’ permit.</p>
5H	Residents’ Permits	<p>Current permit holders should be permitted to retain their permit at the existing rate (adjusted for inflation) for as long as they continue to own their current vehicles, with new rates applying to current permit holders when they attain a new or replacement vehicle.</p>	<p>The suggestion that current permit holders should be permitted to retain their permit at the existing rate for as long as they continue to own their current vehicles would be impractical to administer and would not fit with the scheme’s objective of encouraging residents to make the best choices in terms of vehicle ownership, vehicle use and modes of transport. The scheme would be inequitable if it did not apply, as proposed, to all vehicles/residents.</p>
6A	Obstacles to switching to Electric Vehicles	<p>(a) Insufficient recharging infrastructure to make it viable for people to consider purchasing an electric vehicle.</p>	<p>In December 2018 the City Council made the decision to increase the electric vehicle (EV) recharging infrastructure across the City, and subsequently published “An electric vision for a greener city – electric vehicle charging infrastructure strategy 2020-2025”. This set out ambitious targets of increasing installing at least 200 new recharging points a year.</p> <p>At present there are nearly 2,500 on-street recharging points in Westminster ranging from 5kW to 50kW, these include lamp column recharging points. To view a map of all locations please follow this link:</p>

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			<p>https://lbhf.maps.arcgis.com/apps/Viewer/index.html?appid=d1e9759943844e0a9ee9aac9a80d35d.</p> <p>To help the City Council identify EV recharging points there is a webform on the website: https://www.westminster.gov.uk/request-vehicle-charging-point.</p> <p>The number of electric vehicles used in the UK continues to increase year on year. Therefore, the number of charging points will need to increase to keep up with this demand, especially as many private properties do not have the facilities to charge an electric vehicle off-street. As such the City Council is committed to achieve this by increasing the number of on-street charging points each year.</p>
		<p>(b)(i) Public chargers are often inaccessible, either due to inconsiderate parking / users, or due to maintenance issues / out-of-order or the app does not work.</p>	<p>(b)(i) (ii) & (iii) Westminster City Council provides a wide range of publicly available charging facilities. We have nearly 2,500 on-street EV charging points, ranging from 5kW to 50kW. More are being added to provide even greater coverage. We have also provided charge points for residents by fitting units either inside or next to lamp columns alongside resident parking bays. We have also created more than 400 dedicated EV bays alongside these lamp column charging points from which for residents can charge.</p>
		<p>(ii) Existing charging points are frequently taken by non-resident vehicles. Before this policy can be effective there is a need for more charging points, with some reserved for residents only - ideally unlocked by a fob or card issued with the parking permit.</p> <p>(iii) There is a lack of charging facilities available to residents (most charging bays are occupied by non-electric vehicles or Ubers not residing locally).</p>	

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Item	Theme	Concern	Response
6B	Obstacles to switching to Electric Vehicles	Insufficient EV range on one charge between rechargers	The range of battery charge varies on the make and model of the vehicle; therefore, the City Council cannot comment. However, it is considered that continuing expansion of the City Council’s on-street charging network will alleviate range considerations for those seeking to charge within Westminster.
6C	Obstacles to switching to Electric Vehicles	On-street recharging is expensive – Energy price increases have provided public charger operators an excuse to more than double charge rates (most of which are in excess of 70p/kWh). It is now more expensive to drive an EV (per mile) than a petrol or diesel car.	<p>The City Council does not set the charges to customers, these are determined by the operator. By allowing a number of operators to compete, it allows for greater customer choice and competitive rates.</p> <p>At the time of writing, the rates for residents in Westminster are:</p> <ul style="list-style-type: none"> • Source London, resident subscriber rate: £4 per month, plus 46p/kWh; • BP Pulse, subscriber rate: £7.85 per month, plus 44p/kWh up to 69p/kWh for “ultra-fast” chargers; • ESB Energy, subscriber rate: £4.99 per month, plus 59p/kWh up to 73p/kWh for “ultra rapid” chargers; • Shell Recharge (formerly Ubitricity), 46p/kWh up to 79p/kWh between 4pm-7pm. <p>Please note there may also be a connection fee.</p> <p>It should be noted that on-street charges have to cover VAT at 20% and infrastructure costs.</p>
6D	Obstacles to switching to Electric	(a)(i) Public transport (particularly bus services) is being cut back in some local areas / public stations are poorly maintained / public transport remains poorly	(a)(i) & (ii) Whilst this is beyond the scope of Parking Services and the scope of this consultation, the comments are noted.

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Item	Theme	Concern	Response
	Vehicles	<p>provisioned for families with several young children or prams or people with disabilities.</p> <p>(ii) There is inadequate access to public transport, particularly for disabled residents who cannot access the trains and tube from Queen's Park Station, which does not have step-free access. Similarly, changes to local bus routes and bus overcrowding have also cut off or made travel by bus challenging for many. In particular, older, disabled and people travelling with buggies are often unable to access designated spaces and seats and face arduous journeys travelling across the City and further. The City Council should work closely with TfL to address the inaccessibility of Queen’s Park Station and local concerns in regards to bus routes.</p> <p>(b) Central London’s perceived excellent transportation is littered with delays, strikes, violence which is all too apparent to those actually doing the commutes.</p>	<p>(b) Whilst this is beyond the scope of Parking Services and the scope of this consultation, the comment is noted.</p>
7A	Flawed methodology	EVs are zero CO ₂ so why does the proposed charging structure penalise owners who have tried to do the right thing?	We have traditionally heavily discounted charges for EV and ‘eco’ vehicles (for permits and pay-to-park) but now feel that due to the sharp increase in uptake of electric and hybrid vehicles, a tipping point has been reached whereby such charges have become unsustainable. The Council feels all vehicles should pay for their parking as otherwise we are continuing to overly encourage private car use over more the sustainable modes of transport mentioned above. No other

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Item	Theme	Concern	Response
			<p>local authority in central London offers such nominal parking charges which overly encourage driving into/around their borough. Whilst EVs are of course less polluting than petrol or diesel vehicles, their use still contributes to congestion and they still produce some degree of harmful pollutants such as particulate matter from tyre wear and brake pad wear. Although we of course wish to encourage the use of EVs over more polluting fuel types, hence the proposed charging structure, in the interest of air quality and the commitment the City Council has made to improving this, we still need to ultimately encourage journeys, wherever possible, to be made by the most sustainable modes of transport.</p> <p>Under the new proposed scheme, the cheapest charges in each of Westminster’s parking zones will be lower than Brent, Camden, City of London, Hammersmith. For pay-to-park, charges for EV and plug-in hybrid vehicles are currently extremely low (from 8p an hour in Paddington to just 24p an hour in the West End) as to be virtually nominal. Until 2017, these vehicle types were granted free parking at pay-to-park bays in Westminster.</p>
7B	Flawed methodology	(a) How does a parked vehicle (the more common state of a resident’s vehicle) impact CO2 levels? A scheme based on parking (where no pollution is being produced) compares unfavourably with congestion-charging or the ULEZ scheme, which is based on movement of vehicles through Westminster. ULEZ is, therefore, the more appropriate scheme to achieve the City Council’s aims to reduce pollution.	(a) Transport-related carbon emissions are created by vehicles travelling through Westminster, as well as by those of its residents and by visitors where Westminster is their destination. The Council can however only influence and control what it has the powers to, and for this reason, even were the Ultra Low Emission Zone (ULEZ) not be in existence, we would be unable to implement or enforce a road charging scheme. We do though have the power to

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Item	Theme	Concern	Response
		<p>(b) The City Council should focus on requiring city centre delivery vehicles, buses, coaches and refuse vehicles to be electric.</p>	<p>control use of our kerbside, and residents’ and visitors’ vehicles contribute a significant proportion of emissions that affect air quality in the borough.</p> <p>(b) The City Council as a responsible Highways and Planning Authority is growing a twin track approach towards London’s need to become a Zero Carbon city by 2040. In respect to goods vehicle delivery vehicles, it’s holding preliminary discussions with stakeholders to understand and encourage increases in EV and hydrogen vehicles and also leading on a small number of modest trial/demonstrator schemes such as the recent Pimlico EV ‘Microconsolidation depot’ trial that has emerged as a commercial success, and the trial of two EV Delivery Van pre-bookable bays in Covent Garden and Victoria. It’s hoped the scale and scope of these grow and ultimately businesses invest themselves. Secondly the City Council’s service procurement rules are being updated to mandate a move towards EV and/or hydrogen powered vehicles. A recent example of this development is the waste collection contract with Veolia where a large fleet of EV rubbish-collection HGVs are now in service. Likewise, the City Council encourages TfL to continue its investment in an EV bus fleet and will lobby the express coach, tour coach and tour bus sectors likewise.</p>
7C	Flawed methodology	System does not take into account the contrast between low and high mileage vehicles – a higher banded vehicle may make only a few journeys each year and contribute very little to emissions, whereas a lower banded vehicle could make a significant number	<p>The aim of the proposed emissions-based charging schemes is to encourage the use of low-polluting vehicles and to discourage the use of those which are more polluting.</p> <p>The charge under discussion is for a residents’ permit which</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		of journeys and contribute far more emissions);	enables their vehicle to be parked in resident bays in the zone of their residence. Therefore, it is correct that the residents’ permit charge bears no direct correlation to how often the vehicle is driven. However, The City Council have attempted to link the charge to their stated intention of encouraging the use and ownership of low-polluting vehicles and discouraging that of more polluting vehicles. The schemes therefore aim to 'nudge' those 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, the City Council's car club schemes or active travel schemes.
7D	Flawed methodology	(a) Incentive to switch is greatly reduced by removing EV concessions from residents’ permits and withdrawing the 10-minute concession at pay-to-park bays.	<p>(a) The objective of the emissions-based charging schemes is to discourage use and ownership of older and more polluting vehicles. Low-cost alternatives to car ownership and use exist and are common in Westminster, so we would encourage use of these, namely public transport, cycling, walking and WCC Car Clubs.</p> <p>We have traditionally heavily discounted charges for EV and ‘eco’ vehicles (for permits and pay-to-park) but now feel that due to the sharp increase in uptake of electric and hybrid vehicles, a tipping point has been reached whereby such charges have become unsustainable. The Council feels all vehicles should pay for their parking as otherwise we are continuing to overly encourage private car use over more the sustainable modes of transport mentioned above. No other local authority in central London offers such nominal parking</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
			<p>charges which overly encourage driving into/around their borough. Whilst EVs are of course less polluting than petrol or diesel vehicles, their use still contributes to congestion and they still produce some degree of harmful pollutants such as particulate matter from tyre wear and brake pad wear.</p> <p>Although we of course wish to encourage the use of EVs over more polluting fuel types, hence the proposed charging structure, in the interest of air quality and the commitment the City Council has made to improving this, we still need to ultimately encourage journeys, wherever possible, to be made by the most sustainable modes of transport.</p>
		<p>(b) Cost of a new EV far outstrips cost of just paying more to park in a petrol car.</p>	<p>(b) Our 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.</p>
		<p>(c) Adding charges to the smallest eco-vehicles (which are the least polluting) is contrary to the overall aims of encouraging vehicle owners to change vehicles.</p>	<p>(c) Please see Comment 7D(b) above.</p>
		<p>(d) Incentivisation fails to consider that age / viability of a vehicle is the main driver for changing vehicle.</p>	<p>(d) Please see Comment 7D(b) above.</p>
		<p>(e) With regards to the comment that the City Council wishes to encourage the use of EVs over more polluting fuel types, hence the proposed charging structure: - Zone E Petrol vehicles such as a</p>	<p>(e) Under our proposals, the price to park a high polluting vehicle will be significantly higher than that to park an EV. Our proposals merely aim to ‘nudge’ those who park regularly in Westminster when making choices about vehicle</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		<p>Supercharged V8 Range Rover (surely a classic example of car you would wish to discourage use of) would currently pay £5.69 per hour to park in Zone E. Under the proposed scheme. This will rise to £8.82 an increase of 55% per hour and per day. The EV equivalent for increase as I have mentioned is 469% per hour and 1563% per day. How exactly is that price differential going to encourage a move to EV, or motivate those who have already done so to maintain ownership. It will in fact achieve the exact opposite.</p>	<p>use and ownership, rather than be the sole or primary reason for that choice.</p>
		<p>(f) The proposed pay to park schedule hardly differentiates between zero emission vehicles and the highest polluting cars (e.g. diesel) - for instance, an hourly charge of £3.18 vs £4.77. This is hardly an incentive to utilise electric vehicle to lower the overall pollution levels, and encourages use of diesel within the borough as the initial higher expense of the former will not be sufficiently offset by a meagre £1.59 saving per hour of parking!</p>	<p>(f) Where the proposed charge for an EV/band 1 vehicle is £3.18 per hour, the charge for a band 6 vehicle is £6.37. If the band 6 vehicle is a pre-2015 diesel it would also be subject to the 50% diesel surcharge, rendering the hourly charge £9.55. The Council feels this is significantly different to fit with the scheme’s aims of encouraging the use of low-polluting vehicles and, by the same token, discouraging the use of those which are more polluting.</p>
		<p>(g) The policy objectives are to incentivise drivers to switch to lower emitting vehicles, yet higher emitting vehicles are seeing discounts rather than pricing increases</p> <ul style="list-style-type: none"> • Lower emitting petrol vehicles (Band 3) will see an increase of around 18.5% versus the current pricing bands, while highest emitting vehicles (band 5) is a mere 0.6% above the current highest band 	<p>(g) The emissions-based charging schemes aim to encourage the use of low-polluting vehicles and, by the same token, discourage the use of those which are more polluting. The more polluting the vehicle in terms of emissions and fuel type, the higher the charges. The way the charges have been calculated is outlined in section 6.1.1 of the November 2023 Report. As part of its annual fees and charges reviews the Council would look to review charges to ensure the aspirations of the scheme being proposed are consolidated</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		<ul style="list-style-type: none"> In addition, a large number of older diesel vehicle which before were classed at highest emitting will now benefit from a pricing decrease of 15-20% with very few seeing an increase of less than 1%. 	going forward.
		(h) Electric vehicles are more costly to repair and insure.	(h) Please see Comment 7D(b) above.
		(i)(i) The national evidence has shown that the reduction in incentives from the government has already slowed down EV adoption to a level which now means that targets for adoption by (now) 2035 will be missed. Westminster's removal of incentives will add to this brake on the momentum.	(i)(i) & (ii) The City Council does not feel that its emissions-based charging scheme will disincentivize EV ownership. Under both schemes, EVs will pay the least. Growth in EV ownership and usage in recent years has been significant, to the point where it is unsustainable for the City Council to continue to enable EVs to park for free (resident permits) or for such nominal charges (pay-to-park).
		(ii) The “reasons for decision” states the “charging structure is unsustainable with the rapid growth of electric vehicles”. Recent figures from the SMMT show that there has been a significant slowdown in the growth of electric vehicle sales in the UK. As such, the statement is incorrect	
(j) Electric vehicles contribute significantly to improving air quality by eliminating the emission of nitrogen oxides (NOx) and particulate matter (PM), pollutants primarily responsible for urban air quality issues. The proposed policy change could slow the reduction of these harmful pollutants, impacting public health and the environment.	(j) The City Council does not feel that its emissions-based charging scheme will disincentivize EV ownership or have the effect described. Conversely, by charging the least polluting vehicles the least and the most polluting vehicles the most, it is designed to have the opposite effect.		


APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
7E	Flawed methodology	<p>(a) Sense of betrayal: in recent years, residents chose to purchase, at significant cost and in good faith, an electric vehicle because of the perceived longer term financial benefits through WCC’s incentives for residents’ permit holders and those paying to park, and to be ULEZ compliant. However, the proposals remove those WCC benefits. This draws comparisons with the sense of betrayal felt when the government encouraged people to purchase diesel vehicles, only to reverse their position and apply penalties to diesel owners instead.</p> <p>(b) Could the new charges for EVs only be applied to purchases of EVs after April 2024, rather than retroactively? This is what the government has often done when new tariffs / taxes have been introduced.</p>	<p>(a) We have traditionally heavily discounted charges for EV and ‘eco’ vehicles (for permits and pay-to-park) but now feel that due to the sharp increase in uptake of electric and hybrid vehicles, a tipping point has been reached whereby free or nominal charges have become unsustainable. The Council feels all vehicles should pay for their parking as otherwise we are continuing to overly encourage private car use over more the sustainable modes of transport, such as public transport, cycling, walking and WCC Car Clubs. No other local authority in central London offers such nominal parking charges which overly encourage driving into/around their borough. Whilst EVs are of course less polluting than petrol or diesel vehicles, their use still contributes to congestion and they still produce some degree of harmful pollutants such as particulate matter from tyre wear and brake pad wear. Although we of course wish to encourage the use of EVs over more polluting fuel types, hence the proposed charging structure, in the interest of air quality and the commitment the City Council has made to improving this, we still need to ultimately encourage journeys, wherever possible, to be made by the most sustainable modes of transport.</p> <p>(b) The suggestion that different charges should apply to EVs owned/purchased before and after April 2024 is not something we would consider to be fair or proportionate. It would not fit with one of the schemes’ stated objectives of attempting to ‘nudge’ those who park regularly in Westminster when making choices about vehicle use and ownership. It would also be very difficult/high on impossible</p>


APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
			to administrate, especially for the pay-to-park scheme.
7F	Flawed methodology	Scheme fails to account for the fact that EVs have higher brake wear than conventional ICE cars and contribute more dangerous particulates to the air as a result.	The May 2023 Report acknowledges the issue of particulate matter and advises that the Council would ideally like to be taking a more holistic approach to its kerbside and resident permit charging by considering a vehicle’s Euro Standards classification alongside its levels of CO2 and NOx tailpipe emissions and particulate matter (PM) emissions. Unfortunately, Euro Standards, NOx and PM data is not yet obtainable as standard from the DVLA, hence the focus on CO2. However, the differentiation between the charges low and high battery sizes for EVs in the resident permit scheme proposal does try to account in part for this.
7G	Flawed methodology	Objector's vehicle is not a major polluter / should not be targeted	See 7A which also applies to non-electric, low emission vehicles.
7H	Flawed methodology	Scheme will not affect affluent owners of highest polluting / big EVs – see also 3A	The schemes’ pricing is based primarily on vehicles’ CO2 emission levels and has been devised with our main objective in mind, i.e. to discourage use and ownership of older and more polluting vehicles, but has been done in what the Council feels is a fair and proportionate manner. The pricing has been explained in the November 2023 Report under sections 6 (pay-to-park) and 7 (resident permits). However, section 7.11 advises that 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.
7I	Flawed methodology	Alternative scheme suggested, e.g. based on one of the following attributes:	

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		<p>(a) vehicle size / engine size (larger vehicles produce more emissions and take up more parking space);</p> <p>I drive a Smart Car with an engine size of 599cc. However, I have always had to pay the same amount as a mega large vehicle with a huge engine taking up twice the space. Surely part of the objective is to free up parking space as well as improve traffic flow. By encouraging the use of ultra small cars in cities this would move to facilitate both.</p> <p>I suggest the below:</p> <p>A. Vehicles 2.5 metres in length and 1.5 metres in width and under, with an engine size below 800cc. £75</p> <p>B. Vehicles under 3.2 metres in length and 1.7 metres in width, with an engine size below 1400cc. £125</p> <p>C. Vehicles under 4 metres in length and 1.9 metres in width, with an engine size below 2500cc. £270</p> <p>D. Vehicles over 4 metres in length and 1.9 metres in width, with an engine size above 2000 but below 3000.</p>	<p>(a) The proposed scheme looks to charge by emission levels, so that applies regardless of vehicle size. In terms of the amount of kerbside space a vehicle takes up, charging by vehicle size is not a viable option or one the Council would wish to consider.</p> <p>With regards to setting requirements for vehicle widths, as both pay-to-park and residents’ bays are 2 metres wide, any vehicle parked outside the bay markings would be subject to receiving a penalty charge notice. It is, therefore, considered that there is no need to further specify widths for a scheme for parking charges. In terms of length, parking fees and charges in Westminster are not, and have never been, based on vehicle length.</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		<p>£350</p> <p>E. Luxury supercars with engine sizes above 3,000. £1,000</p> <p>(b)(i) mileage (data source not suggested)</p> <p>(ii) mileage – one suggestion was that the Council should work with Transport for London to set up a pay-per-mile system with a varying charge based on the amount of CO2 emitted when a vehicle is actually in use. This would discourage all private vehicle use, but especially use of older, more polluting vehicles.</p> <p>(c) affordability – one request is that for low-income families, such as those in social housing who do not have free parking, the City Council could look at whether they are in receipt of housing benefit allowance and the charges are adjusted accordingly?</p>	<p>(b)(i) Please see also section 7C above. It is not clear on what information the City Council could easily and reliably obtain this information for charging purposes.</p> <p>(ii) A pay-per-mile system in Westminster would require a significant operation, infrastructure, data centre and maintenance which is not practical or an efficient use of public money for the required purpose.</p> <p>(c) Please see section 3A above. In paying for parking, a driver is paying for a service and parking charges are not means tested. Paying for parking is part of the process of running a car, alongside tax, MOT, fuel, maintenance etc, and the Council is of the opinion that the annual resident permit charge represents excellent value for money when compared to visitor parking, where only 4% of transactions are by resident permit holders. Furthermore, one of the schemes’ stated objectives is 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 need to use those vehicles in Westminster at all or could alternatively rely on public transport and/or the Council’s car club schemes.</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		<p>(d) Single pensioners, owing one vehicle and living alone, ought to be granted a reduction in tariff given that such persons are entitled to 25% reduction in Council tax.</p>	<p>(d) No parking charges are subject to means testing. They are considered part of running a vehicle, as per car tax, MOT, insurance, fuel, etc.</p>
		<p>(e) Euro 6 compliance; ULEZ compliance</p>	<p>(e) Ideally, we would like to include Euro 6 compliance within the proposed charging structure, but this is not information that is commonly held within DVLA records. DVLA data limitations are addressed in para 5.12 of the May 2023 Report. Likewise, the binary ULEZ compliance data (i.e. vehicles merely comply or do not comply) is too blunt for use within our proposed schemes, which propose tiered charging dependent upon emissions levels.</p>
		<p>(f) Passed MOT emissions test</p>	<p>(f) The MOT emissions test does not record CO2 or NOx emissions and only targets Carbon Monoxide, hydrocarbons (essentially unburnt fuel) and Lambda (which is a calculated measurement of the remaining oxygen content of the exhaust emission compared to the ambient air). Therefore, while a vehicle may have passed its MOT emissions test, this does not indicate its CO2 emissions level or whether it is a diesel vehicle.</p>
		<p>(g) Consider a reduction in the number of pay-as-you-go parking bays to discourage private vehicle usage in favour of more sustainable transportation options.</p>	<p>(g) As well as having a legislative duty to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians), it is also incumbent upon the Council, as the Highway Authority, to provide suitable and adequate parking facilities on and off the highway. The Council therefore needs to balance provision with demand,</p>


APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
			<p>but can use various levers, such as the provision of space or charging, to affect demand. Pay-to-park provision is being slowly reduced in favour of other kerbside facilities, such as cycle lanes, cycle hangars, greening etc. but this requires careful management.</p>
		<p>(h) I have never understood why non-Westminster residents should benefit from such a good incentive. Increase the charge for non-residents and maintain [the incentive] for Westminster residents.</p>	<p>(h) It is intended that the proposed charges would encourage all vehicle owners, with the means, to consider using an electric vehicle in the future while applying appropriate charges for parking on the highway.</p>
		<p>(i) The old vans and lorries that are servicing the ever-increasing construction in the borough are the principal emitters of pollution and should be the target of these proposals.</p>	<p>(i) Under emissions-based charging, vehicles will be charged primarily based on their CO2 output, as well as by fuel type. Such vehicles will therefore be charged accordingly for their parking.</p>
<p>(j) Opposed to having a blanket charge on all pre-2015 diesel vehicles regardless of the NOx and PM emissions, It would be fairer and indeed more sensible to state a precise emission standard a vehicle must meet, i.e. Euro 6 Diesel Emissions Standard, and/or a Nitrogen Oxides (NOx) emission limit, i.e. 80mg/km NOx (and 4.5mg/Km Particulate Matter) which is exactly what the Ultra Low Emission Zone (ULEZ) requirements do very clearly and effectively.</p>	<p>(j) Section 5.12 of the May 2023 report outlines the limitations of the DVLA data available to us. This explains that whilst ideally the Council would be considering a vehicle’s Euro Standards classification alongside its levels of CO2 and NOx tailpipe emissions and particulate matter (PM) emissions, unfortunately, Euro Standards, NOx and PM data is not yet obtainable as standard from the DVLA.</p> <p>Whilst the ULEZ attempts to incorporate such considerations into its scheme, the data available to it is limited in the same way. As a binary system (i.e. a vehicle either complies or it doesn’t, with no tiered or graded element), it can more readily utilise algorithms based on general vehicle data and assumptions, as well as operating considerable white lists for</p>		

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		<p>(k) Why not look to compromise by starting to change prices on the weekend or a limited amount of days to create a transition period for current subsidy-dependent people commuting to Westminster every day? Why not filter by models first?</p>	<p>where in reality vehicles do not match. This would not be possible currently for the tiered structure we have proposed. To address this, our scheme incorporates a diesel surcharge for pre-2015 diesel vehicles as this generally aligns with Euro Standards.</p> <p>(k) The aim of the scheme is to encourage motorists to make the best choice in terms of vehicle ownership, vehicle use and modes of transport. The schemes aim to ‘nudge’ those who park regularly in Westminster, 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. Whilst a phased implementation was considered, the way we are running the scheme is consistent with this aim.</p>
		<p>(l) Increase further the rates charged on higher emission vehicles and retain a significantly lower rate for zero rated vehicles, which could be half of the proposed rate [in order to retain the incentive for people to use / adopt EVs.]</p>	<p>(l) The Council has proposed charges that it considers are fair and proportionate for the introduction of an emissions-based charging scheme. In terms of the differential between the highest and lowest charges, the Nov 2023 Report advises under para 7.11 that in order to consolidate the aspirations of the scheme going forward, the Council would look to top load any future charging increases to the higher, more polluting, bands as part of its annual fees and charges reviews.</p>
		<p>(m) Discrimination against Foreign Registered Vehicles:</p> <ul style="list-style-type: none"> • According to the proposal, foreign registered vehicles are priced at the highest most polluting 	<p>(m) Our proposed scheme relies on DVLA records. If a vehicle is unregistered at the DVLA and its details are therefore unknown, charges will default to the highest banding. This is common policy for most emissions-based</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		<p>category irrespective of the vehicle emissions.</p> <ul style="list-style-type: none"> • Differentiating pricing purely on the basis of a vehicle being foreign is unfair and discriminatory against foreign visitors. • Foreign registered vehicles, where possible, should be charged at the correct band based on their emissions. <ul style="list-style-type: none"> ○ While it is understood that it may not be always possible to determine the correct pricing band for a foreign vehicle, there are practical solutions, which are already in existence, that can resolve this issue. ○ For example: <ul style="list-style-type: none"> ▪ TfL allows for registration of foreign vehicles for transiting the ULEZ ▪ RingGo, the phone application chosen by Westminster Council to administer Pay to Park, already allows for foreign vehicles to be registered with documentary evidence and for these to be classed in the correct band. • It is fair to give foreign vehicles an option to charged correctly or to request a refund if overcharged. <ul style="list-style-type: none"> ○ It can be reasonable to apply the highest polluting band for those vehicles who had not been correctly registered by their owner in the App database ○ However, it would be discriminatory to 	<p>charging schemes run by local authorities across London and is not felt to be discriminatory. We would however consider any request to refund as appropriate if an incorrect charge is levied.</p> <p>In terms of pre-registration, this can be done through the RingGo system and with evidence, RingGo would be able to add details to their system so that foreign vehicles are charged the correct rate. Retrospective refunds can also be considered should a vehicle be proven to have been overcharged.</p>


APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		<p>charge vehicles a higher fee purely because they have a foreign number plate and provide no option for the foreign vehicle to comply or obtain a refund.</p>	<p>(n) The surcharge for diesel vehicles is intended to discourage ownership of vehicles which have generally higher NOx emission levels than other vehicle types.</p> <p>(o) Please see Comment 7E(a) above.</p> <p>(p) Please see Comment 2E(i) above.</p> <p>(q) In formulating the second and third resident permit charges we have attempted to be fair and proportionate whilst still incorporating some degree of demand management into the pricing. Although it is correct that we often differentiate motorcycle charges from cars and vans, it is felt that in this case the additional permit charge should be uniform. All parking charges are subject to regular review and</p>
		<p>(n) It would be great if this [diesel] surcharge – on top of the higher annual parking fee, would be cancelled or amended to help differentiate between residents vs non-residents.</p>	
		<p>(o) A more sensible and fairer path to reduce high carbon emissions and improve air quality (and not add further to the cost inflation that many cannot afford) is to change the current resident parking charges to penalise higher polluting cars but on a cost neutral basis. Then determine, over a suitable period of time, the TFL ULEZ impact. Let’s hope it does a better job of reducing Westminster’s high carbon emissions than the Congestion charge has done in reducing congestion.</p>	
		<p>(p) SUVs – please see 2E(i).</p>	
		<p>(q) We would suggest that the additional vehicle surcharge be specific to the type of vehicle registered, such that for example a resident with 1 car and 1 PTW need not pay the surcharge. This will appropriately incentivise residents with a PTW to keep it and use it for journeys where they need powered private transport but do not need to use a car. The</p>	

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		<p>effect of this incentive will be to reduce emissions and congestion in Westminster, as per the stated aims of the policy.</p>	<p>the number of residents who take up the option of a third permit will be closely monitored, as will the vehicle types involved. If this policy results in issues in terms of the availability of space, differential pricing can be something we use to affect demand going forward.</p>
		<p>While this argument does not apply to a resident with 2 PTWs, it is clearly inequitable to charge the same surcharge for PTWs and cars. Westminster rightly distinguishes between cars and PTWs in other aspects of its charging regime, to therefore apply this policy and charge at the same level for additional vehicles is not consistent with the Council's own understanding.</p>	
		<p>We would suggest that since the aim of the additional vehicle surcharge is to reduce kerb space taken up then if any surcharge must be levied on residents with more than one PTW then proportionately it cannot be more than 1/8th the level of the surcharge for cars, i.e. £6.25 for the first additional vehicle. Given the low level of this charge, reflecting the low impact of PTWs, the simplest and most rational solution would be for the Council to not apply the additional vehicle surcharges to PTWs.</p>	
<p>(r) We also note that residents PTW permits are already overpriced compared to their impact, and these proposals will see them rise further. As outlined already, PTWs take up 1/8th as much parking space than cars, however these proposals will see them charged 2/3rds the rate of cars in the emission band</p>	<p>(r) Whilst it is acknowledged that motorcycles do not contribute to congestion as much as larger vehicles, the Council's parking charges are not, and have never been, directly related to vehicle size. In obtaining a resident permit for their motorcycle, the bike can be parked in any resident bay in the permit holder's zone of residence as well as in any</p>		

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		<p>most PTWs would fall in, i.e. £61/year for a PTW compared to £91/year for a car.</p> <p>Furthermore, the on-paper emissions of a car are likely to underestimate their impact in an urban environment, due to the effects of congestion. PTWs do not contribute to congestion and are less affected by it, so the same cannot be said of them. A study by University of Leuven [https://www.tmlleuven.be/en/project/motorcyclesandcommuting] quantified this effect finding that the impact of congestion approximately doubles the marginal impact of 1 additional car in an urban environment. Since PTWs have on average less than half the on-paper CO2 emissions of cars it can therefore be said that their marginal impact in a congested urban environment is at least 4 times lower.</p> <p>Reflecting the Council's aims to reduce emissions and free up kerbside space, both of these factors should therefore be reflected in permit prices. A proportionate price for PTW permits would therefore be 8 times lower reflecting space taken up, and 2 times lower reflecting the difference in marginal emissions impact between a car and a PTW with similar on-paper emissions. We suggest therefore that the residents PTW parking permit should be reduced to 1/16th the level of the car residents permit, i.e. £5.70/year. We recognise that this is likely too low a price to administer, but demonstrates that increasing PTW</p>	<p>solo motorcycle bay city-wide without further charge. As we are moving to an emissions-based charging scheme, where most bikes will produce tail pipe emissions, it is felt that the proposed charges for motorcycles are fair.</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		<p>permit prices further is counterproductive to the Council's aim that parking charges should be proportionate to impact.</p> <p>(s) Whilst I appreciate that the incentive towards greener vehicles could not last indefinitely, I would have thought that keeping at least the parking permit free for EV could have encouraged the more sceptical ones to make a switch.</p>	<p>(s) Please see Comment 7E(a) above.</p>
7J	Flawed methodology	<p>The Equalities Impact Assessment (EQIA) makes flawed conclusions as to the impact on the elderly (as distinct from those with disabilities) which has not been analysed properly since the EQIA states in respect of Age that there is no local data but distribution of service users is expected to be in line with UK licence holder levels. The report states the changes will have no specific impact on older people (50+) without providing any supporting evidence. However, those over state retirement age will be severely impacted if their small and relatively low emitting car is charged at the proposed rate.</p>	<p>In obtaining the Cabinet Member decision to approve the schemes, the City Council conducted an equalities impact assessment (EQIA). Whilst this concluded there could possibly be some negative ramifications for disabled people and those on low incomes which should be mitigated, it identified a positive impact 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. The EQIA is published online: https://committees.westminster.gov.uk/documents/s56780/EQIA%20Parking%20Fee%20Structure%20Review.pdf</p>
7K	Flawed methodology	<i>[Absorbed into another category]</i>	-
7L	Flawed methodology	Already pay road tax / congestion charge, which are based on the vehicle’s emissions level	See 8B.
7M	Flawed methodology	The differing charges for electric vehicle batteries are illogical as most of these vehicles are manufactured in	See 11E.

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		<p>other countries and have no impact on Westminster. The cost of the vehicle reflects its carbon footprint.</p>	
8A	Legal / ethical concerns	<p>(a) Scheme is about raising revenue rather than protecting the environment (see also 8F):</p> <p>The Cabinet Report reveals that the new parking charge structure is expected to yield an increase in income to the Council of £5.310m on Pay-to-Park, £0.840m on Resident Permits, and £0.090m on Trade Permits - a total of £6.24m pa, representing an increase of 13%. These sums represent yet another financial burden on the motorist and are being implemented by stealth - there was no mention of these sums in the email that was sent to resident permit holders.</p> <p>(b) Why does Westminster Council state the rationale is to reduce these high carbon emissions and improve air quality when the increase is not even a cost neutral measure. The proposed changes, I understand, raises £800K and that it is a 20% increase on current levels and with more than 70% of resident parking owners paying more.</p>	<p>(a) The City Council is forbidden by law from introducing schemes purely with the aim of generating extra revenue. However, the creation of a surplus will not in and of itself be unlawful providing the primary motivation for or intention of the proposal is the achievement of objectives which are consistent with our traffic management duties as laid out in the Road Traffic Regulation Act 1984. The City Council is also bound by legislation to re-invest any surplus made from on-street parking services in prescribed transport related activities only. This is recorded through a memorandum statement, the Parking Places Reserve Account (PPRA), which details the Parking surplus and how it has been reinvested. In 2022/23 for example, the four main areas of funding were highways and transportation improvements/maintenance, environmental improvements and street cleansing, concessionary fares and Home to School transport.</p> <p>(b) As outlined in section 9.1 of the Nov 2023 Report, 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</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
			<p>positively affect air quality. Whilst the setting of charges cannot be used as a means to purely and intentionally raise revenue, the generation of revenue is permitted if it is incidental to the setting of charges for other valid reasons.</p>
8B	Legal / ethical concerns	<p>(a) Council has no right to charge for on-street parking</p> <p>(b) The proposal may be illegal as it could involve a breach of the Data Protection Act. The DVLA have a duty to safeguard drivers’ car registration details. I am not satisfied that Westminster parking wardens should be given access to this information.</p> <p>(c) Most residents of the UK do not have to pay to park their cars outside their houses. The act of charging Westminster residents to park a car at home is in itself discriminatory. Imposing a financial burden upon residents not sufficiently affluent to own a house with a driveway or garage is furthermore discriminatory. Westminster residents who pay council tax should be entitled to free residents’ parking under a scheme funded by revenue derived from charging non-residents to park in the borough.</p>	<p>(a) I can confirm that the City Council is empowered to apply and modify charges for on-street parking by virtue of the Road Traffic Regulation Act 1984. These charges are regularly reviewed, and more significant changes can be considered (as in this instance) to reflect the traffic management requirements relevant to the present circumstances.</p> <p>(b) There is no data protection issue with the way in which the scheme will be administered. Any vehicle’s details are available to view online on the DVLA’s website via their vehicle enquiry service: https://vehicleenquiry.service.gov.uk/.</p> <p>(c) Please see Comment 8B(a) above. The City Council is entitled to charge for on-street parking under existing highways legislation. There is currently no requirement to provide free on-street parking on a public road or to ensure residents are able to park outside their house. It is not uncommon, where there is a high demand for on-street parking, for charges to be applied to manage those parking spaces. Similarly, there is no requirement for parking charges to be means tested.</p> <p>It is not uncommon in London, or anywhere where significant</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
			demand for kerbside space exists, for local authorities to charge for resident permits. Local authorities have statutory traffic management and air quality duties, both of which would not be being met should we allow free parking to all of our residents.
8C	Legal / ethical concerns	<p>(a) Retroactive introduction of emissions-based charging is unfair.</p> <p>(b) Why was no input sought from residents or other stakeholders prior to the two Cabinet Member decisions?</p>	<p>(a) See 7E.</p> <p>(b) The Council felt it was appropriate to first gain Cabinet Member approval for the concept of introducing emissions-based charging and then for some degree detail in terms of how such schemes may work before consulting wider with residents and other stakeholders. It was considered that to consult earlier would have been too broad in scope.</p>
8D	Legal / ethical concerns	Consultation information was difficult to find / respond to / lack of notification	<p>The statutory consultation period ran between 24th January 2024 and 14th February 2024. The City Council has attempted to communicate the proposals to as many residents as possible, i.e.</p> <p>(a) an email was sent to all permit holders advising them of the proposals and how to make comments;</p> <p>(b) a text message was sent to every RingGo user who had used their service to park in the City in the last three months advising them of the proposals and how to make comment;</p> <p>(c) press notices in the local newspaper and London Gazette were published advising of the proposals and how to</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
8E	Legal / ethical concerns	<p>(a) For such a significant change, the consultation period has been very short. Such a short period for consultation gives too little time for residents to make representations and too little time for Westminster to consider (and act upon) responses. The consultation process therefore gives the appearance of “going through the motions”, perhaps with no real commitment to considering and acting upon representations.</p> <p>(b) The notice of the planned implementation date on the City Council’s Parking web site gives residents, pay-to-park users and businesses with a fleet of</p>	<p>make comment;</p> <p>(d) a combination of letters and emails were sent to all key stakeholders, including emergency services, residents’ associations and groups with an interest in highway matters.; and</p> <p>(e) the City Council’s Traffic Orders web site, one of two web sites which provided information on how to respond to the consultation, was updated on 25th January 2024 to make it clearer how submissions could be made on the proposals. Wherever a concern was expressed in the first few days of the consultation about where information on how to respond could be found, either the City Council or their agents, WSP, responded directly to those queries providing the relevant information.</p>
		<p>(a) The City Council has followed the statutory requirements for traffic order proposals which require that the consultation is a minimum of 21 days. Following receipt of a significant number of responses during the consultation, the City Council delayed the anticipated implementation dates of the new charges in order to provide more time to review the responses.</p> <p>(b) Our planned implementation dates of 18 March 2024 for pay-to-park and 1 April 2024 for resident permits were published in January 2024. These were then extended by 3</p>	

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		<p>vehicles little time to make alternative arrangements or adjust their plans. This should be contrasted with the longer and more reasonable notice period TfL has provided for the Cleaner Vehicle Discount.</p>	<p>weeks for pay-to-park (to 8 April) and by 2 months for resident permits (to 3 June). We had wished to give more time from announcement to implementation but unfortunately the Cabinet Member decision giving approval for the scheme was ‘called in’ by opposition members and this necessitated a significant delay as the decision was taken through the Council’s appropriate Policy & Scrutiny panel. It is acknowledged that notice was short but the aim of the scheme is 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 need to use those vehicles in Westminster at all or could alternatively rely on public transport and/or the Council’s car club schemes. It was not anticipated that announcement of the intention would result in immediate wholesale fleet replacements.</p>
8F	Legal / ethical concerns	<p>Question how revenue will be spent to improve air quality (see also 8A)</p>	<p>The City Council is bound by legislation to re-invest any surplus made from on-street parking services in prescribed transport related activities only. This is recorded through a memorandum statement, the Parking Places Reserve Account (PPRA), which details the Parking surplus and how it has been reinvested. Not all revenue generated from emissions-based charging would then be ploughed back into improving air quality, although some will through various future transport-related schemes. In 2022/23 for example, the four main areas of funding via the PPRA were highways and transportation improvements/maintenance, environmental improvements and street cleansing, concessionary fares and Home to School transport.</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
8G	Legal / ethical concerns	The result of the consultation is pre-determined.	The City Council has a legal obligation to consider all comments received from the statutory consultation before making a decision.
8H	Legal / ethical concerns	The City Council has no political mandate from the electorate to impose the new system/charges.	The introduction of the emissions-based charging schemes has been approved by the Cabinet Member for City Management and Air Quality following the correct governance procedures. The Cabinet Member is a member of the party elected by Westminster residents to lead and govern Westminster City Council.
9A	Environment / global concerns	<p>(a)(i) Emissions / environmental damage from the proportionately higher production costs of new EVs outweighs the benefit of keeping an existing vehicle – essentially, the benefit to Westminster’s environment is counterbalanced by the damage to the areas which are producing such vehicles.</p> <p>It is also argued that the greatest volume of emissions is associated with the construction of new vehicles rather than use.</p> <p>(ii) Electric vehicles are expensive to make, require rare minerals to be dug up by low paid workers in African mines.</p>	<p>(a) There are two primary environmental costs relating to an electric car: the manufacturing of the vehicle and its battery, and the energy required to power the battery.</p> <p>While electric vehicles require more energy to manufacture and start their life off the showroom forecourt with a higher “carbon debt”, this debt is paid off within about two years of driving the vehicle. Thereafter, the life cycle emissions of a battery electric vehicle are lower than ICE vehicles – in the case of the more efficient electric vehicles, the emissions are considerably lower. Furthermore, more of the UK’s energy is coming from renewables, reducing the environmental impact of powering electric vehicles, which is not the case for ICEs which rely upon oil production. See also 9A(d) below.</p> <p>It is recognised that each vehicle owner must determine whether and <u>when</u> it is appropriate for their personal needs, their budget and their environmental aspirations to replace their existing vehicle to take advantage of the lower charges for parking electric vehicles under the proposed emissions-</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		<p>(b) I vehemently object to these proposals to allow electric vehicles to be charged less than other vehicles. Electric vehicles are incredibly bad for the environment and users should be paying more for these vehicles, not less. The negative environmental impact, created by the mining of the necessary components needed for making batteries together with the horrendous negative impact of not being able to dispose of batteries in a healthy way and leaking dangerous chemicals into the environment, is far worse than then the ‘supposed’ good that we are being sold as a reality. It is the inverse of what you are suggesting.</p>	<p>based charging scheme or whether to wait until such time as their vehicle requires replacement.</p> <p>It is recognised that the mining of lithium, cobalt and nickel has a high environmental cost as well as an association with poor working conditions in certain countries. It is considered that improved recycling of batteries and the development of more efficient batteries will contribute to a reduced demand on those areas. There are also developments in battery composition with cobalt-free or reduced cobalt batteries emerging.</p> <p>(b) The policy context for introducing emissions-based charging schemes is outlined in section 4 of the May 2023 Report. Road transport is the second biggest single source of pollutants within Westminster. The geographically specific nature of road-related air pollution means that transport emissions heavily contribute to air pollution hotspots across the city. Exposure to high localised spikes in pollution levels, which can have serious short-term adverse health impacts, are predominantly caused by road transport emissions. The public health impacts of air pollution are well recognised and the focus on air quality aligns fully with the Council’s Fairer Westminster priorities, in particular the Fairer Environment objectives. It aligns with the Councils’ 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; City Plan 2019-2040; EV Charging Infrastructure Strategy 2019-2025;</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		<p>(c)(i) Please give details of what initiatives the City Council plans to put in place to safely and environmentally dispose of these lithium batteries used in EVs. If you have not yet devised what you are going to do to dispose of these batteries, you cannot claim this is an environmentally motivated initiative.</p>	<p>and Air Quality Action Plan 2019-2024. See also 9A(a) above.</p> <p>(c)(i) Whilst lithium-ion batteries used in electric vehicles can be recycled, it is vital that they are recycled in a safe and specialist way. To recycle a lithium-ion battery, it needs to be taken to a specialist recycling centre. It is generally considered that recycling is far preferable to landfill disposal due to the value of the materials within the battery and the environmental repercussions to the soil. The UK government recognises the necessity of improving recycling and the efficiency of the process due to the finite resources of lithium available and that, as the electric vehicle sector continues to grow, there are also potential economic advantages to specialising in efficient recycling of lithium-ion batteries.</p> <p>Veolia, the City Council’s waste contractor, has an EV battery recycling system in place. Please visit https://www.veolia.com/en/pollution/hazardous-waste/recycling-electric-car-batteries for more information.</p>
		<p>(ii) Electric vehicle batteries cannot be effectively recycled once dead.</p>	<p>(ii) Current processes can recover up to 95% of the key raw materials from an electric vehicle battery. The EU already requires that EV batteries be at least 50 percent recyclable by weight, which will increase to 65 percent by 2025.</p>
		<p>(d) Electric vehicles often require fossil fuel to generate electricity.</p>	<p>(d) Fossil fuels make up around 33% of UK electricity supplies in 2023, compared to 97% in 1957. Renewables now account for around 43% of electricity generation.</p>


APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		<p>(e)(i) My car may be old, but it is not environmentally friendly to send old cars to landfill. It takes a lot of energy to produce a new car.</p> <p>(ii) The manufacture of my vehicle has already created tons of CO/CO2 and to scrap it will produce MORE. That I should be encouraged to buy another manufactured vehicle will produce yet FURTHER CO/CO2 emissions, emissions that will never be amortised in light of the very limited mileage I travel.</p>	<p>Electricity from fossil fuels reached a peak of 303TWh in 2008 but dropped to 104TWh in 2023. While use of fossil fuels has been in decline and renewables on the increase, the continuation of this trend in the coming years (and the growth or decline of nuclear power) are dependent on national government policy.</p> <p>(e) With some of the worst air-quality in the country the City Council is committed to taking action to reduce the emissions from cars used within the City where it is within its ability to do so. While it is recognised that producing new cars is not without environmental impact these vehicles are significantly less polluting and often cheaper for the driver to run. Older vehicles do not have to be sent to landfill and can either be sold for use outside the City or broken for parts to avoid scrapping of other vehicles.</p>
9B	Environment / global concerns	<p>Battery materials are mined in conflict zones, such as DRC, so have a significant negative impact on people in those countries for the benefit of those in the UK who are otherwise unaffected / disconnected from the global repercussions of these policies.</p>	<p>It is recognised that the mining of lithium, cobalt and nickel has a high environmental cost as well as an association with poor working conditions in certain countries. It is considered that improved recycling of batteries and the development of more efficient batteries will contribute to a reduced demand on those areas. There are also developments in battery composition with cobalt-free or reduced cobalt batteries emerging.</p> <p>In March 2023 the government published a policy paper ‘Resilience for the Future: The UK’s Critical Minerals Strategy’ which outlined collaborative working with</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
			<p>international partners. This strategy will support UK businesses to participate in building relationships with responsible and diversified overseas chains.</p> <p>There is currently vast innovation in terms of production of electric vehicles and their batteries. Alternative battery chemistries are gaining prominence which will help ease the pressure on critical mineral supply.</p>
10A	Other concerns	Emissions should be managed at higher than borough level, e.g. national level rather than on a piecemeal basis.	Whilst this is perhaps correct, in the absence of wider, national management, the onus is on local authorities to tackle issues and priorities in their own area.
10B	Other concerns	<p>(a) Council should look issues that add to pollution such as:</p> <ul style="list-style-type: none"> (i) the many cycle lanes; (ii) 20mph zones; (iii) LTNs and other traffic calming measures that force motorists to use only certain routes, creating continuous day-long traffic jams; (iv) the antiquated traffic light timing system; and (v) constant prolonged road works. <p>(b) Consideration should be given to variable speed limits depending on how much traffic is on the road.</p> <p>(c) Moving the hugely polluting Coach Station out of Victoria (and all the resultant coach traffic) would do far, far more for the clean air objective than just raising taxes on private vehicles.</p>	<p>(a) The new charging schemes are designed to work alongside the other proportional and reasonable measures the Council has implemented to encourage active travel and use of public transport. Not all of the issues flagged in this question are the responsibility of the City Council or in its control.</p> <p>(b) The representation is noted.</p> <p>(c) This is not something that the Council can unilaterally decide but Officers are working with TfL to mitigate the impact of the coach station and ensure its use is fit for purpose in the 21st century.</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		<p>Not only are most of the buses that use that station polluting, they also cause traffic chaos which increases the traffic on the roads and causes additional pollution.</p> <p>(d) The borough could benefit from finding alternative solutions, such as levying a vehicle surcharge during the period of construction work (responsibility of the master contractor) to account for the natural increase in heavy emitting vehicles that the construction industry brings.</p> <p>(e) There is constantly a traffic jam on Park Lane due to the cycle lane. There are never any cyclists in that cycle lane as they (myself included) prefer to use the cycle lane inside Hyde Park.</p> <p>(f) A few suggestions for reducing carbon emissions:</p> <ul style="list-style-type: none"> • Demand that office buildings are carbon neutral (and ask office buildings to turn lights off at night which would also improve air pollution) • Move the bus station and other heavy transport hubs • Demand that all tourist / tour busses in the city be electric • Crackdown on idling of cars • While it is detrimental that listed buildings are kept under strict planning control (these 	<p>(d) There are legal restrictions on how Local Authorities can charge developers for the impact of their works, both at the Planning stage and in terms of access to the Highway.</p> <p>(e) The representation is noted but Park Lane is managed by TfL and not the City Council.</p> <p>(f) The representation is noted.</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		<p>buildings are so important to the city) you should encourage energy efficiency in buildings</p> <ul style="list-style-type: none"> • Crackdown on antisocial driving (to this point I am also amazed that Westminster does enforce big fees on cars/motorcycles that are set up to make a lot of noise) • Tax any cars that service the building industry <p>(g) Instead of burdening residents with additional charges, I urge the council to explore alternative strategies that prioritise fairness and effectiveness. This could include implementing targeted measures to reduce emissions from commercial activities, incentivizing the adoption of electric vehicles through subsidies or tax incentives, and investing in sustainable transportation infrastructure to encourage modal shifts away from private car usage.</p> <p>(h) The main cause of pollution is the traffic in Central London, which is primarily caused by the huge amounts of roadworks all over the city, road closures, bad driving, lack of traffic enforcement, the large increase in booked cabs which are constantly circling and the introduction of bicycle routes on key arteries such as Regent’s Street forcing stopping buses and cars onto one lane. It is clear that traffic is no longer flowing as it should do, and throw in the 20 mph enforcements, we have the slowest traffic of any key European city.</p>	<p>(g) The City Council is investing heavily in support for active travel and public transport. The Council also has one of the highest ratios of EV charging points to resident vehicles of any Local Authority.</p> <p>(h) The representation is noted. Not everything in the question is within the control of the City Council however the City Council is concerned not only with improving air quality and tackling the climate emergency but also improving road safety and making the City more “walkable”.</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		<p>(i) From a Covent Garden resident: it's the chaotic road closures causing massive traffic problems, idling cars, and a significant reduction of parking spaces, causing people to drive around for 30-45 minutes to find a parking spot, etc.</p>	<p>(i) These are all significant concerns, although the City Council has only limited powers to deal with road closures and idling vehicles. These are though just some of the reasons why the aim of the scheme 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 need to use those vehicles in Westminster at all or could alternatively rely on public transport and/or the Council's car club schemes.</p>
		<p>(j) The City of Westminster's own calculations which they have made public show that 84% of air pollution in Westminster comes from buildings! What are they going to do now?</p>	<p>(j) To see what action the council is taking to address emissions in the built environment, please refer to our Climate Emergency Action Plan (Published 2021) and most recent progress report (Published March 2023) Climate action plan Westminster City Council. The council has specific actions aiming to improve the energy efficiency of the borough's building stock and support the transition of these buildings to sustainable energy sources.</p>
		<p>(k) There are other, potentially more immediately impactful measures the City Council can take to reduce emissions without such adverse impacts on the most financially vulnerable residents - specifically focusing on mitigating the effects caused by big businesses and developers.</p>	<p>(k) The City Council's Climate Emergency declaration has generated a host of initiatives to help improve air quality. Our emissions-based charging proposals are just one such initiative that focuses on vehicles.</p>
		<p>(l) It is not the fault of the local residents if the emissions are high! It would be the fault of all the traffic that is allowed into the area and along roads such a Marylebone High Road, Park Lane and all</p>	<p>(l) We are introducing emissions-based charging schemes for both pay-to-park (visitors) and residents' permits (residents).</p>


APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		<p>around Hyde Park Corner which remains outside of the congestion charge area. It means that there is a higher volume of all types of cars, vans and trucks within our borough and for which we, as residents, have no control over.</p> <p>(m) I would welcome more ideas / measurements to tackle the already compromised air quality of Westminster. Such as implementing more areas that are pedestrian only and free of cars, speeding up the transition of buses to low emission or zero emission vehicles.</p>	<p>(m) Air quality is now at the heart of much of the City Council’s decision-making, but some areas, such as buses, are beyond the scope of the City Council.</p>
10C	Other concerns	<p>(a)(i) RBK&C allow residents’ permits to be used borough-wide, encouraging residents to use local shops and facilities; why can’t Westminster do this to add value to its own permits?</p> <p>(ii) For many years the Belgravia Residents Association have had members come forward complaining about the restrictive zoning and felt a better model would be as exists in RBKC.</p> <p>(b)(i) In Pimlico, on a daily basis, it is difficult to source a residents’ parking space. Parking restrictions in this area are very lax. They are from Monday to Friday only. At weekends, it is almost impossible to</p>	<p>(a) The City Council continues to encourage the use of more sustainable forms of transport such as buses, trains, the Tube network, bicycles or walking (wherever practical). Allowing residents’ permit holders to park anywhere in the borough would encourage driving where alternative means exist, thereby adding to congestion and pollution on the borough’s roads. In addition, residents travelling to more commercial Zones would then prevent local residents from being able to park in their neighbourhood. This would disproportionately affect some Zones and their permit holders more than others, especially where certain Zones have comparatively few residents’ parking spaces.</p> <p>(b) The Council intends to launch a number of zonal parking surveys in the near future where things like zonal hours of control will be considered.</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		<p>identify a resident’s parking bay because of the proliferation of non-permit holders occupying residents parking bays. The Council must extend the restrictions from Monday to Saturday 1.30pm (at the very least, like the Victoria area).</p> <p>(ii) I do not think is fair we pay for parking and most of the time cannot park because others are parking for free. Weekends are free parking for everyone which is also not fair. So why can't the hours be longer from Monday to Friday and extend it to weekends.</p>	
10D	Other concerns	<p>(a) Deterioration in Council-run public services should be a priority, including public sanitation and street-cleansing</p> <p>(b) The residents’ parking spaces on my street (Hertford Street), in fact within a five-minute walk in every direction, are mostly suspended due to one utility or construction company or another paying to do this. The council has absolutely no joined up planning with reference to broadband fibre installation, as the same road/pavement is dug up for the very same purpose on a monthly if not weekly basis.</p> <p>(c) It is not possible to keep an electric car in Westminster due to the large number of rats that eat through vehicle electrics in the Pimlico area and nest</p>	<p>(a) Concerns about street-cleansing should be reported via the “Report It” facility on the City Council’s web site (https://www.westminster.gov.uk/report-it) and then selecting the appropriate concern. This will help the City Council target resources accordingly to address these concerns.</p> <p>(b) The City Council has a team dedicated to the management and co-ordination of works on the highway to minimise disruption to our road-users. Unfortunately, utilities have statutory powers to undertake works that cannot be refused (the City Council has limited powers to reschedule or replan works) and applications for a hording or scaffold on the highway in association with construction works must not be unreasonably withheld.</p> <p>(c) The representation is noted.</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		<p>in vehicles. The same issue affects hybrids and combustion engine vehicles, but damage to the electrical circuits in an electrical vehicle are more likely to result in an insurance write off. The council pest control have known about this for years and have failed to do anything about it.</p> <p>(d)(i) Increase the number of traffic wardens who can catch up with motorists, as they often park their cars knowing full well that there aren't many traffic wardens around. Some of them even park on single or double yellow lines! We live in the Westminster area, and we know full well how these motorists get away with it and, at the same time, occupy the Resident's Bay.</p> <p>(ii) Please bring back the paper Resident Parking Permits. Without paper parking permits, the residents cannot tell which cars are parked illegally in the resident bays.</p> <p>(iii) Ever since Westminster parking removed the concept of displaying parking permit badges on the front of the car, people are parking fraudulently on regular basis. There was a car I reported several times (Fiat 500) who was still parked in the B permit zone every day for 3 weeks.</p> <p>I want the displayed parking permits to be brought back so that residents can see that cars are correctly parking in the B permit Zone. Without the badge</p>	<p>(d)(i) Our Marshals are on-street every day to ensure that motorists park compliantly in line with the regulations. However, there will always be motorists who willingly or unwillingly park in contravention.</p> <p>(ii) & (iii) Our Marshals are able to tell from their handheld devices which vehicles possess a permit and which do not. They are also able to tell which vehicles may be subject to a genuine concession or exemption and which may be parked in contravention.</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		anyone can park. We are paying for a service which is not cheap and we expect exclusivity for it.	
10E	Other concerns	<p>(a) Concerns about micromobility scheme / bicycles ignoring traffic controls.</p> <p>(b) I wish to lodge a concern that electric bikes and electric scooters are not covered by this scheme. Surely, they are not emission free?</p>	<p>(a) Concerns about abandoned e-bikes or e-scooters being used as part of the City Council’s current trial of dockless parking places should be submitted to the City Council or the relevant service provider via https://www.westminster.gov.uk/report-it/abandoned-electric-hire-bike-or-e-scooter. Vehicles, including bicycles, ignoring traffic controls is a police matter.</p> <p>(b) Electric bikes and e-scooters do not display vehicle registration marks so are not covered by the parking restrictions or by parking enforcement. As such, they are not required to pay to park and neither are they eligible for residents’ permits.</p>
10F	Other concerns	<p>(a) Electric vehicles catch fire often - potentially lethal in an underground car park.</p> <p>(b) They are much heavier than petrol / diesel vehicles so they cause more potholes and road damage.</p>	<p>(a) The City Council is not aware of any evidence that demonstrates that electric vehicles catch fire more often than internal combustion engine (ICE) vehicles. Data indicates that electric vehicles are in the region of 20 times <u>less</u> likely to experience fires than ICE vehicles. However, it is recognised that on the rare occasions when battery fires occur, they can be quite dangerous. Fire brigades are developing bespoke responses for these situations and car park owners should formulate appropriate safety protocols to mitigate the effects of a battery fire, should it occur.</p> <p>(b) See 11A(i).</p>

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Item	Theme	Concern	Response
		(c) Electric vehicles cause far more particulate pollution from wear to their tyres.	(c) The City Council’s May 2023 Report on the introduction of emissions-based charging (https://westminster.moderngov.co.uk/ieDecisionDetails.aspx?ID=1896) acknowledges the issue of particulate matter and advises that the Council would ideally like to be taking a more holistic approach to its kerbside and resident permit charging by considering a vehicle’s Euro Standards classification alongside its levels of CO2 and NOx tailpipe emissions and particulate matter (PM) emissions, unfortunately, Euro Standards, NOx and PM data is not yet obtainable as standard from the DVLA, hence the focus on CO2. However, the differentiation between the charges low and high battery sizes for EVs in the resident permit scheme proposal does try to account in part for this.
10G	Other concerns	I and others would much appreciate a note of the cost of the analysis and administration [of the scheme] that you describe.	This information is covered in section 8 of the City Council’s November 2023 Report (https://westminster.moderngov.co.uk/ieDecisionDetails.aspx?ID=1974), in particular in paragraphs 8.5 to 8.8.
11A	Rationale / Data / Evidence	(a) How does this scheme address pollution in Westminster?	(a) We are able to point to evidence of our own experience. Since its introduction in 2017, our diesel surcharge scheme, which imposes a 50% surcharge on pre-2015 diesel vehicles when paying to park, has had a marked effect in reducing the amount of pre-2015 diesel vehicles using the service. This scheme was initially trialled in one zone of Westminster in June 2017 (F zone – Hyde Park, Marylebone and Fitzrovia) before being rolled out city-wide in August 2019. In the initial period between June 2017 and February 2019 for example, there was a significant decline in

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Item	Theme	Concern	Response
			<p>pre-2015 diesels in F zone as a percentage of overall transactions; from 42% down to 28%. This suggests that such schemes can and do have an impact. Whilst emissions-based resident permit schemes are fairly commonplace amongst London boroughs, and have been for some time, this is not the case for pay-to-park. The London Borough of Islington have been the first to introduce the latter, but their scheme only came into effect from July 2023.</p>
		<p>(b) The rationale for the scheme conflates “poor air quality” with CO2 emissions. CO2 is a greenhouse gas and does not noticeably affect breathability of the air and people’s health, except in high concentrations indoors. The proposals should focus on particulates and NO_x.</p> <p>Pollution comes primarily from SO_x and NO_x emissions. CO2 contributes to global warming and, indeed, should be eliminated, but the pollution directly impacting health comes from other types of emissions, with NO_x being the most dangerous, particularly for young people.</p>	<p>(b) The City Council has declared both a Climate and Environment Emergency. With some of the worst air quality in the country we must do something to improve the lives of our residents. Unfortunately, the DVLA data needed to run a scheme on anything other than CO2 is not able to be integrated into a charging scheme so the focus must be on that gas. However, it is worth noting that those vehicles in the lower tiers of the Council’s schemes will likely produce less of other harmful gases or particulates too.</p>
		<p>(c) Question whether the proposals are actually necessary? What are the pollution levels in Westminster and how do these compare to other London boroughs?</p> <p>By its own admission no analysis has been done on the likely impact on emissions of this price hike in</p>	<p>(c) The policy context regarding the proposal is outlined in section 4 of the May 2023 Report, specifically in the 4.1 and 4.2 paragraphs. The proposal fully with the Council’s Fairer Westminster priorities, in particular the Fairer Environment objectives, as well as the Councils’ Climate Emergency Declaration. The Council’s focus on air quality initiatives also features strongly in a range of other current and future</p>

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Item	Theme	Concern	Response
		<p>parking nor has there been any study on the balance of emissions from transiting traffic as opposed to residential traffic. The price increase is based on an unsupported assumption - “it stands to reason that” - and a study on a specific type of vehicle (diesel) which is now 6-7 years out of date.</p>	<p>council policies and strategies such as: The Greener City Action Plan 2015-2025; Air Quality Manifesto 2018; Walking Strategy 2017-2027; City Plan 2019-2040; EV Charging Infrastructure Strategy 2019-2025; and Air Quality Action Plan 2019-2024.</p> <p>The City of Westminster has some of the highest carbon emissions and some of the worst air quality of any national local authority, so the Council’s proposed schemes are to deliver local positive impacts by encouraging the use of cleaner vehicles. Please see 9A(j) below for more details.</p>
		<p>(d) With regards to the comment that EVs still produce some degree of harmful pollutants such as particulate matter from tyre wear and brake pad wear. - EVs have regenerative braking rendering the use of brakes almost unnecessary to retard a vehicle's speed from the giddy levels of 20mph, particularly vehicles such as The Renault Zoe. Such is the strength of regenerative braking that Volkswagen has switched from brake discs and pads, to brake drums, on the rear of its ID series of EVs, and on other EVs using its modular electric drive matrix (MEB) platform like the Skoda Enyaq.</p>	<p>(d) The representation is noted. While regenerative braking is becoming more powerful and it is accepted that a return to drum brakes is being seen in the industry, all vehicles (including EVs) take up space on the highway, create wear and tear, are a risk to pedestrians or cyclist, and produce tyre particles</p>
		<p>(e) The incremental surcharge per additional permit. A lot of households have two cars. Can you please provide the evidence that the council has produced that charging £50 will incentivise cleaner less polluting vehicles?</p>	<p>(e) Since its introduction in 2017, our diesel surcharge scheme, which imposes a 50% surcharge on pre-2015 diesel vehicles when paying to park, has had a marked effect in reducing the amount of pre-2015 diesel vehicles using the service. This scheme was initially trialled in one zone of</p>

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Item	Theme	Concern	Response
			<p>Westminster in June 2017 (F zone – Hyde Park, Marylebone and Fitzrovia) before being rolled out city-wide in August 2019. In the initial period between June 2017 and February 2019 for example, there was a significant decline in pre-2015 diesels in F zone as a percentage of overall transactions; from 42% down to 28%. This suggests that such schemes can and do have an impact.</p>
		<p>(f) What are the measurable outcomes of this proposal?</p>	<p>(f) The measurable outcomes would be the split of vehicles that pay-to-park and obtain resident permits over time. For both, we would anticipate a noticeable shift from the higher bandings to the lower bandings.</p>
		<p>(g) The charge must be based on actual damage (particulates). Such figures are also readily obtainable - e.g. MOT Test Results. This would also make the banding brackets coherent rather than a broad-brush approach.</p>	<p>(g) The Council is open to refining the charging model in future years if different alternatives are found to be viable. However, at present charging tiers based on DVLA CO2 data is the only effective workable option.</p>
		<p>(h) The introduction of a £50 diesel surcharge onto residents’ parking permits for pre-2015 diesel vehicles to address the issue of the emission of Nitrogen Oxides (NOx) would be applied based on an arbitrary benchmark, i.e. the year of registration. The benchmark should be a precise compliance with the ultra-low emission certificate (Euro 6 for diesel), rather than a year of registration. Diesel car manufacturers addressed the NOx and PM issues gradually, so some diesel cars complied with the ultra-low emission certificate (Euro 6) already by the end of 2014, while</p>	<p>(h) The City Council has been operating a diesel surcharge on pre-2015 diesels for pay-to-park transactions for a number of years. Using the year of manufacture works effectively and enables management of live transactions on street.</p>

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Item	Theme	Concern	Response	
		<p>others only by September 2015. If the new parking permit diesel surcharge is simply based on the 2015 as the year of registration, it will penalize the pre-2015 ultra-low emission diesel cars and will not introduce a surcharge for the polluting cars registered in 2015 but not complying with the ultra-low emission certificate (Euro 6). In other words, to incentivise the cleaner and less polluting vehicles (as stated in the objectives of the new parking scheme), the criteria should be a precise compliance with the ultra-low emission certificate, rather than an irrelevant year of registration. Moreover, the parking diesel surcharge for non-compliance with the Euro 6 certificate will be consistent with other existing charges and policies (for, example with the ULEZ policy), whereas the literal pre-2015 year of registration criteria will be a significant contradiction to the existing ULEZ and to the stated intention of the new parking scheme to incentivise cleaner and less polluting vehicles.</p>		
		<p>(i) Giving electric vehicles such low costs are madness seeing the damage they are doing to our roads through the weight!</p>		<p>(i) The comment is noted. However, the data is disputed as to what degree electric cars are responsible for road damage when compared to other much larger vehicles.</p>
		<p>(j) Could you please clarify your statement that ‘the City of Westminster has some of the highest carbon emissions and worst air quality of any national local authority’ - at the GLA Plenary Meeting in October 2022 the Mayor of London stated that the reason he wanted permission to expand the ULEZ to the outer</p>		<p>(j) The City Council is not able to comment on the Mayor of London’s comments as he represents Transport for London and the Greater London Authority (GLA), rather than Westminster City Council. However, it is understood that the GLA plans to release data after the mayoral election to demonstrate the efficacy of their wider ULEZ scheme. The</p>

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Item	Theme	Concern	Response
		<p>London boroughs was because the ULEZ in Central London had been so effective at reducing pollution in Central London, and that outer London boroughs had considerably worse air pollution. This statement - that the outer London boroughs had the worst air pollution - was a main argument presented consistently by the Mayor throughout the process of implementing ULEZ expansion.</p> <p>With all due respect, both statements cannot be true. Either the City of Westminster has the worst pollution (despite years of ULEZ restrictions), or the Outer London Boroughs have the worst pollution (as stated by the Mayor to support the expansion of the ULEZ).</p>	<p>following London Assembly press release from 10th February 2023 (https://www.london.gov.uk/new-report-reveals-transformational-impact-expanded-ultra-low-emission-zone-so-far) provides information about the efficacy of the Inner London ULEZ, prior to the zone’s expansion to Outer London on 29th August 2023. The Six Month ULEZ report on the expanded ULEZ is due after the mayoral election, with a One Year report expected in 2025. An interim statement was published by the London Assembly on 9th March 2024 (https://www.london.gov.uk/new-report-reveals-dramatic-improvements-londons-air-quality-2016) which also indicates air quality is improving but has not yet met WHO clean air guideline levels.</p> <p>The City of Westminster has some of the highest carbon emissions and some of the worst air quality of any national local authority, so the Council’s proposed schemes are more nuanced than the London-wide ULEZ and look to deliver more local positive impacts through the provision of discounts for ‘cleaner’, less polluting vehicles.</p> <p>The dataset from https://naei.beis.gov.uk/laghgapp/ places Westminster as the second worst local authority in the UK at 73.2 kt of CO2 per km² in 2021, behind the City of London (at 173.1 kt CO2. Overviews of NO2 and particulate emissions at https://naei.beis.gov.uk/emissionsapp/ also indicate the work still required for London local authorities.</p> <p>The Grid Emissions Summary dataset at https://data.london.gov.uk/dataset/london-atmospheric-</p>

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Item	Theme	Concern	Response
		<p>(k)(i) WCC attempts to justify the plan by reference to climate change. There is little doubt that the climate is changing, as indeed it always has, but there is considerable uncertainty as to the extent to which this change is due to exploitation of fossil fuels, other human activity or natural causes. The environmental impact of WCC’s tax hike is so marginal that clothing it in green is at best green washing and fashionable virtue signalling.</p> <p>(ii) London is the largest conurbation in the UK so it is unsurprising that it emits a lot of CO2. But Westminster is as windy as anywhere else (we are endlessly told that we need more wind farms) but obviously the wind blows polluted air away.</p> <p>(iii) WCC attempts to justify the plan by reference to a target for 2040. It is hard to believe that by that time, 16 years hence, these ULEZ charges will make any difference and almost all of the old cars blamed here will have been scrapped by then anyway.</p>	<p>emissions-inventory--laei--2019 places Westminster between the second worst and fifth worst in London for emissions of NOx, PM10, PM2.5 and CO2.</p> <p>(k)(i) There is almost unanimous scientific consensus that humans are changing Earth’s climate. King’s College London found that in a survey the UK public estimated that there was a consensus level of around 65% between climate scientists that human-caused climate change is happening. This figure is far below the actual level of consensus between scientists by analysis of climate-related studies which found a level of consensus near or above 99%.</p> <p>(ii) The representation is noted.</p> <p>(iii) The representation is noted.</p>
11B	Rationale / Data / Evidence	What percentage of residents are responsible for the emissions issues compared to visitors, commercial vehicles and through-traffic?	This is unfortunately data that is not readily available and that it is impossible for the City Council to ascertain itself. The percentage is therefore unknown.
11C	Rationale /	(a) Querying rationale for increased charges to	(a) We are unable to include motorcycles in the general

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Item	Theme	Concern	Response
	Data / Evidence	<p>motorcycles.</p> <p>(b) Discouraging residents who have a car from also owning a PTW will lead to increased emissions and congestion in Westminster. If they decide they need their car and get rid of their PTW then some of the trips they'd previously done by PTW would then be done by car, meaning increased emissions and congestion in the Borough.</p>	<p>emissions-related banding due to data limitations in the DVLA information we can obtain, as DVLA data for motorcycles is more limited than for cars and vans. The proposal is therefore for motorcycles to be charged a generic rate for both permits and zonally for standard pay-to-park bays. The increase in the motorcycle charges reflect the fact that the Council has been able to keep their charges static for some time – for example, the motorcycle resident permit last increased in January 2021 - but unfortunately now a small increase is needed to ensure that we manage demand effectively for the available space. It should be noted that charging for motorcycle bays is not affected by the emissions-based charging proposals and will remain £1 per day city-wide, with various longer-term options still available which work out even greater value for money.</p> <p>(b) Whilst the representation is acknowledged, low-cost alternatives to multiple vehicle ownership and use exist and are common in Westminster, so we would encourage use of these, namely public transport, cycling, walking and WCC Car Clubs.</p>
11D	Rationale / Data / Evidence	Scheme is anti-motorist / car	It is considered that the proposals seek to improve air quality for all people in Westminster and to contribute towards the reduction in CO2 levels in the atmosphere. The proposed charges are intended to encourage those in a position to make a decision or reviewing their current vehicle ownership to either favour those vehicles which contribute less

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Item	Theme	Concern	Response
			emissions or, where practical, to make more use of alternative sustainable forms of transport.
11E	Rationale / Data / Evidence	Querying rationale for different charges for zero emission vehicles based on their battery size – both types of vehicles are zero emissions so why is there is difference in the cost of a residents’ permit?	<p>We have traditionally heavily discounted charges for EV and ‘eco’ vehicles (for permits and pay-to-park) but now feel that due to the sharp increase in uptake of electric and hybrid vehicles, a tipping point has been reached whereby such charges have become unsustainable. The Council feels all vehicles should pay for their parking as otherwise we are continuing to overly encourage private car use over more the sustainable modes of transport mentioned above. No other local authority in central London offers such nominal parking charges which overly encourage driving into/around their borough. Whilst EVs are of course less polluting than petrol or diesel vehicles, their use still contributes to congestion and they still produce some degree of harmful pollutants such as particulate matter from tyre wear and brake pad wear. Although we of course wish to encourage the use of EVs over more polluting fuel types, hence the proposed charging structure, in the interest of air quality and the commitment the City Council has made to improving this, we still need to ultimately encourage journeys, wherever possible, to be made by the most sustainable modes of transport.</p> <p>As stated in section 7.2.1 of the City Council’s November 2023 report on the introduction of emissions-based charging (https://westminster.moderngov.co.uk/ieDecisionDetails.aspx?ID=1974), the distinction between battery sizes has been made because battery technology has improved significantly since the mainstream adoption of EVs, and there are now</p>

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			<p>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.</p>
11F	Rationale / Data / Evidence	<p>(a) The latest Westminster City Council Air Quality Annual Status Report (for 2022, published in July 2023) shows that air quality in Westminster has been improving steadily over the past 8 years under the current parking charge regime, and in most cases are meeting the council’s targets. Westminster’s air quality is better now than it has been for many decades. There is, therefore, no need to penalise motorists further to achieve the City Council’s objective of improving air quality.</p> <p>(b) London still has pollution, but far less than similar cities. In comparison to high polluting cities like Hangzhou, Shanghai, Beijing and Chennai, the amount of pollution experienced by London is far less (indeed, see how much less it pollutes than the rest of UK on a per-capita basis! https://naei.beis.gov.uk/laghgapp/). The necessity of climate-related charges is overstated. The</p>	<p>(a) The Council’s latest Air Quality Annual Status Report shows that air quality in Westminster is slowly improving. However, it remains the case that Westminster has some of the highest carbon emissions and worst air quality of any national local authority, so our proposed emissions-based charging schemes, which align with WCC’s Fairer Westminster vision and a number significant WCC strategies and policies concerning air quality, look to continue to deliver local positive impacts through the provision of discounts for ‘cleaner’, less polluting vehicles.</p> <p>(b) Comparisons with other major cities around the world indicate that London is not amongst the most polluted. However, the UK and its local authorities set their own targets for air quality relative to what is desirable for the health and wellbeing of its residents and visitors.</p> <p>The data shown at https://naei.beis.gov.uk/laghgapp/ indicates that London, <u>as a whole</u>, has a relatively low level</p>

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Item	Theme	Concern	Response
		<p>aforementioned cities will pollute the planet and their own people eons more than London will, and any climate emissions won't make much of a difference regardless.</p>	<p>of CO2 emissions per capita compared to the rest of the UK. However, Westminster itself is in the second highest category (6.2 – 8.5t CO2e). The per capita dataset should be considered in context: the emissions per km2 and the grand total emissions datasets place Westminster in the highest category.</p>
12A	Pay-to-park	<p>(a) Punitive street parking charges have had negative effects on local businesses, such as in Camden and Islington, and will discourage people from patronising businesses.</p> <p>(b) I can't even begin to imagine the negative impact on the entire EV-driven community of businesses and tech companies that are currently operating in London and flourishing on the back of this amazing subsidy initiatives. This includes, EV-charging point developers, small and medium businesses who have invested millions of pounds into shifting to electric fleets for their workers (and will see their operating costs bounce overnight) but will also completely annihilate innovation in the EV-sector in Central London (companies like On.to for example).</p>	<p>(a) The aim of the scheme 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 need to use those vehicles in Westminster at all or could alternatively rely on public transport and/or the Council's car club schemes.</p> <p>(b) We have traditionally heavily discounted charges for EV and 'eco' vehicles (for permits and pay-to-park) but now feel that due to the sharp increase in uptake of electric and hybrid vehicles, a tipping point has been reached whereby such charges have become unsustainable. The Council feels all vehicles should pay for their parking as otherwise we are continuing to overly encourage private car use over more the sustainable modes of transport mentioned above. No other local authority in central London offers such nominal parking charges which overly encourage driving into/around their borough. Whilst EVs are of course less polluting than petrol or diesel vehicles, their use still contributes to congestion and they still produce some degree of harmful pollutants such as particulate matter from tyre wear and brake pad wear. Although we of course wish to encourage the use of EVs over more polluting fuel types, hence the proposed charging</p>

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Item	Theme	Concern	Response
		<p>(c) Increasing the price for pay-to-park adds additional cost to any business hiring tradespeople to do any work – effectively a tax on Central London businesses. Already companies will not come into London due to congestion charge, ULEZ and parking – adding £30-100 to the cost of any works – and this will contribute to fewer. You have proposed tradesperson cards, but could you not allow businesses to have some cards for reduced parking?</p>	<p>structure, in the interest of air quality and the commitment the City Council has made to improving this, we still need to ultimately encourage journeys, wherever possible, to be made by the most sustainable modes of transport.</p> <p>(c) The daily trades permit scheme we operate gives trades people a significant concession to park. A trades permit allows a vehicle to be parked all day in a resident bay or a pay-to-park bay whilst the trades person is carrying out works or services to premises. A trades permit retails at the equivalent rate of a day's parking at each respective zone's base rate.</p>
12B	Pay-to-park	Removal of concession for EVs will hit commuters	<p>The aim of the scheme 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 need to use those vehicles in Westminster at all or could alternatively rely on public transport and/or the Council’s car club schemes.</p>
12C	Pay-to-park	Charges encourage high polluting vehicles to move	<p>Vehicles that fail to pay the appropriate charge for a pay-to-park bay or do not have a valid permit for a residents’ parking place can be issued with a penalty charge notice. The charging structure may lead some vehicles to be driven a bit further than otherwise in order to find cheaper or alternative parking but it is anticipated that the number of vehicles this will affect would be relatively small and would be offset by those drivers who may be encouraged to use more sustainable modes of transport for their journey, such as</p>

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Item	Theme	Concern	Response
			walking, cycling, public transport or car club.
12D	Pay-to-park	Charges will push EV owners into Ubers which will be cheaper than pay-to-park, thus defeating aims of scheme	While some commuters may switch to using private hire vehicles, it is hoped that the majority of those considering a switch will choose electric or hybrid electric vehicles or consider the use of public transport, e-bikes, e-scooters or cycling where this is practical.
12E	Pay-to-park	<p>(a) Diesel vehicles that emit ≤ 90g/km CO₂ emissions will actually see a reduction in the price they pay and even the biggest increase is c1.5x current pricing, completely unaligned with the 18-fold increase faced by EVs following the removal of the 10-minute payment concession.</p> <p>(b) The new pricing bands will decrease parking costs for older diesel vehicles while increasing costs for EVs:</p> <ul style="list-style-type: none"> • According to the new proposed pricing, a large number of Diesel vehicles which before fell into the highest band (Diesel vehicles registered before 2015) will now fall under cheaper pricing bands. • A few examples based on 4 hours stay in Zone A: <ul style="list-style-type: none"> ○ 2014 Audi A4 Allroad TDI CO2 161 g/km 	<p>(a) Both petrol and modern diesel vehicles that fall within the two lowest emissions bands would see a discount under emissions-based charging. This is intended to encourage owners of such vehicles to retain those vehicles and to encourage owners of higher emission vehicles to switch to lower emission vehicles.</p> <p>The notable increase in proposed pay-to-park tariffs arises from the withdrawal of the 10-minute concession. Please see 7E for more information as to the necessity behind this decision.</p> <p>(b) Under emissions-based charging we will continue to apply the 50% diesel surcharge for pre-2015 diesel vehicles, as well as incorporate this into the resident permit scheme. The schemes look to charge based primarily on CO₂ emission levels with the diesel surcharge applying to cover the heaviest NO_x polluters. Percentage increases for EVs can be misleading as their charges have until now been free (resident permits) or nominal (pay-to-park). Ultimately, the lowest polluting vehicles will pay the lowest charges, and the highest polluting vehicles the highest.</p>

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Item	Theme	Concern	Response
		<ul style="list-style-type: none"> ▪ Previously: £25.32 ▪ Now: £21.84 (14% cheaper) ○ 2013 BMW 520D CO2 154 g/km <ul style="list-style-type: none"> ▪ Previously: £25.32 ▪ Now: £21.84 (14% cheaper) ○ 2012 Ford Mondeo 2.0 Duratorq CO2 129 g/km <ul style="list-style-type: none"> ▪ Previously: £25.32 ▪ Now: £20.00 (21% cheaper) ○ 2010 VW Passat 1.9 TDI CO2 137 g/km <ul style="list-style-type: none"> ▪ Previously: £25.32 ▪ Now: £20.00 (21% cheaper) • According to the new proposals, parking costs for an EV will increase by approximately: <ul style="list-style-type: none"> ○ EVs: 1,700% (17x) based on a 4h stay ○ PHEVs: 1,980% (20x) based on a 4h stay • The policy objectives are to incentivise drivers to switch to lower emitting vehicles, yet higher emitting vehicles are seeing discounts rather than pricing increases. <ul style="list-style-type: none"> ○ Lower emitting petrol vehicles (Band 3) will see an increase of around 18.5% versus the current pricing bands, while highest emitting vehicles (band 5) is a mere 0.6% above the current highest band. ○ In addition, and as mentioned before, a large number of older diesel vehicle which before were classed at highest emitting will now benefit from a pricing decrease of 15-20% with very few seeing an increase 	

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Item	Theme	Concern	Response
		<p>of less than 1%.</p> <ul style="list-style-type: none"> • While the principle of having pricing by emissions is a good one, the way the pricing has been segmented is completely wrong and clearly promoting the opposite of its objectives. <p>(c) Pricing of Hybrid Vehicles vs Electric Vehicles</p> <ul style="list-style-type: none"> • PEHVs, while being among the lowest polluting vehicles category, still create significant emissions, with the category extending to vehicles emitting up to 90g/km which is still substantial. <ul style="list-style-type: none"> ○ To put this figure in comparison, some lower emitting petrol vehicles (non-hybrid) are just above 100g/km. • While I believe it’s important to incentivise lower emissions vehicles, the pricing for this class is almost the same as zero emission EVs which does not make the adoption of a zero-emission vehicle attractive. • There should be a strong reduction in EV pricing which should be subsidised by higher pricing for PEHVs and higher pollution vehicles. • Since EVs only represent 5% of the total vehicles on London roads (according to UK Gov statistics as of Q3 2023), it should be possible to maintain the current 10 minutes pricing for EVs only (excluding PHEVs). • At a time when EV sales are slowing due to the 	<p>(c) The schemes look to charge based primarily on CO2 emission levels with the diesel surcharge applying to cover the heaviest NOx polluters. Ultimately, the lowest polluting vehicles will pay the lowest charges, and the highest polluting vehicles the highest. In order to consolidate the aspirations of the scheme going forward, as part of its annual fees and charges reviews the Council would also look to top load any future charging increases to the higher, more polluting bands.</p>

APPENDIX A – CITY COUNCIL’S RESPONSES TO COMMONLY CITED CONCERNS (CONTINUED)

Item	Theme	Concern	Response
		<p>lacking progress in charging infrastructure and where new vehicles sales of more polluting PHEVs is increasing 45% vs last year (according to SMTT) it would be more sensible to charge PHEVs Band 1 pricing and keep the 10-minute rate for pure EVs only.</p> <p>(d) The new charges could be staggered over time, to give car owners time to adjust and help with economic travel planning; and local businesses should have some form of exemption.</p> <p>(e) Electric vehicle drivers should at least be granted a few years to adapt to this change. The removal of the congestion charge exemption comes into effect in Dec 2025, so at the very least this change to the parking charges should align with this date. You could also think about a phased reduction in charges. Maybe a min charge 30 minutes rather than 10 minutes for electric cars for the first year, or something like that.</p>	<p>(d) See 5F. The City Council do not consider it appropriate to exempt businesses from parking charges.</p> <p>(e) See 5F.</p>

APPENDIX B – RESPONSES TO CONSULTATION

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS												
1.	<p>██████████ Waste and Parks Westminster City Council</p> <p>████████████████████</p> <p>Email dated 23rd January 2024</p>	<p>This scheme will have no impact on waste collections or street cleansing.</p>	<p>1A, Noted.</p>												
2.	<p>██████████ ██████████</p> <p>Email dated 23rd January 2024</p> <p>[Please also see #359]</p>	<p>I would be grateful if you could clarify a couple of points regarding this TMO for me...</p> <p>Is the 2nd vehicle surcharge intended to apply to motorcycles as well as cars, and to vehicles of different types or only multiple vehicles of the same type?</p> <p>Taking for example a resident with 1 motorcycle and 1 band 3 petrol car – would they pay £184.04 (£60.99 + £123.05) per year or £234.04 (£60.99 + £123.05 + £50)?</p> <p>Taking as another example a resident with 2 motorcycles – would they pay £121.98 or £171.98 per year?</p> <p>I would also be grateful if you could confirm my understanding that this TMO only affects non-residents' motorcycles if they are parking in standard car parking bays, and does not affect non-residents' motorcycles parking in solo motorcycle bays. I think this is clear from the text of the order stating it affects "on-street pay-by-phone parking places [...] not including [...] motorcycle parking</p>	<p>1B, WSP replied to ██████████ on 30th January 2024:</p> <p>The 2nd vehicle surcharge would apply to <u>any eligible vehicle type</u> for which an individual requests a residents' permit. This would include motorcycles.</p> <p>In the first example you provided, the costs for a resident with 1 motorcycle and 1 band 3 petrol car would be:</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;">Motorcycle (1st permit)</td> <td style="text-align: right;">£60.99</td> </tr> <tr> <td>Band 3 petrol car (2nd permit)</td> <td style="text-align: right;">£123.05 + £50.00</td> </tr> <tr> <td>TOTAL</td> <td style="text-align: right;">£234.04</td> </tr> </table> <p>In the second example you provided, the costs for a resident with 2 motorcycles would be:</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;">Motorcycle (1st permit)</td> <td style="text-align: right;">£60.99</td> </tr> <tr> <td>Motorcycle (2nd permit)</td> <td style="text-align: right;">£60.99 + £50.00</td> </tr> <tr> <td>TOTAL</td> <td style="text-align: right;">£171.98</td> </tr> </table> <p>The proposals would affect all motorcycles wishing to use pay-to-park bays, residents' bays and shared-use bays.</p>	Motorcycle (1 st permit)	£60.99	Band 3 petrol car (2 nd permit)	£123.05 + £50.00	TOTAL	£234.04	Motorcycle (1 st permit)	£60.99	Motorcycle (2 nd permit)	£60.99 + £50.00	TOTAL	£171.98
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APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		places” but I would just like to be 100% sure!	Solo motorcycle bays (which are reserved solely for motorcycles) are <u>not</u> affected by these proposals and the charges for these bays would remain as set out on the following web page: https://www.westminster.gov.uk/parking/motorcycles/where-park-your-motorcycle-and-how-much-it-costs
3.	<p>██████████ Traffic Management Officer for the Government Security Zone, and the borough of Westminster Roads and Transport Policing Command Metropolitan Police Service ██████████ ██████████ ██████████</p> <p>Email dated 24th January 2024</p>	<p>Many thanks for the email. The Met Police have no objection, comments or observations with regard to the proposal.</p> <p>My reference: TMO-CW1062TD2024.</p>	1A, Noted.
4.	<p>██████████ ██████████ ██████████</p> <p>Email dated 25th January 2024</p>	<p>Thank you for your message below with the 28 page Cabinet Member Report. I wonder how the poor Councillors find time to digest all this guff!</p> <p>(a) I note that the charging plan described is so complex that, unsurprisingly, motorists cannot be informed of the cost of parking by a notice or in advance.</p> <p>It is clearly the case that this is effectively an extension of the ULEZ Scheme, with all the inherent unfairness of that form of taxation. I have</p>	<p>WSP replied to ██████████ on 30th January 2024; comments in italics were not part of that original reply:</p> <p>(a) 4A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>written to our local councillor to express that concern.</p> <p>(b) I am sorry to point out that the first para of your first message to me and presumably other interested parties did not say that all residents' parking permits would also be subject to ULEZ charging: I quote:</p> <p>“From Wednesday 24th January, the City Council will commence consultation on the introduction of emissions-based charging for all generic pay-by-phone parking bays in the City (not including housing estates and certain restricted pay-by-phone bays such as motorcycle only pay-by-phone bays, taxi pay-by-phone bays, coach pay-by-phone bays and market traders' bays). The scheme also includes price increases for parking cards and trade permits, and additional charges for second and third residents' permits.”</p> <p>This seems to me such a glaring omission as to invalidate it as notice of the intended consultation. Do you agree?</p> <p>(c) Perhaps I have missed it but I have seen no reference to the planned extension of this ULEZ charge scheme in the national print or broadcast media. Have you issued a press release?</p> <p>(d) I am also concerned that the consultation period from 24 Jan to 14th Feb is far too short. I will struggle to convene a meeting of Pimlico residents'</p>	<p>(b) Thank you for spotting the error in the first paragraph. You are quite right that it should mention residents' permits too. The Notice of Proposals and Statement of Reasons correctly reflect the changes. Unfortunately, it was my brief summary in the email that was lacking. I will be issuing an updated email to all stakeholders and councillors shortly to emphasise the effects of this scheme on both type of parking. The Russell Street reference is indeed an oversight and will be removed from the reissued email.</p> <p>(c) 8D</p> <p>(d) 8E. Three weeks is the statutory length for a Traffic Order consultation. The City Council has indicated that there are no plans at the present time</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>association reps to discuss this in that time. Could you extend it please?</p> <p>(e) Your first message to me included trail mail from 2021 concerning Russell Street. I am not sure of its relevance and perhaps it was just an oversight.</p>	<p>to deviate from the statutory process.</p> <p>(e) <i>The reference to Russell Street was a clerical error and a revised email was sent to residents' associations and other key stakeholder groups on 25th January 2024.</i></p>
	<p>Email dated 28th January 2024</p>	<p>Thank you for your excellent email below. I have also seen your subsequently amended round robin and I applaud it.</p> <p>I found the email attached from Westminster City Council this morning.</p> <p>It tells half a story and does not permit a reply, which is probably to prevent ordinary folks from asking awkward questions, like:</p> <p>(f) "How much more is this going to cost me?" and</p> <p>(g) "Is this really just a greenwash-disguised tax hike, in excess of the inflation rate?"</p> <p>Let's see. Here is the table in the WCC's email attached. It doesn't tell you much - but a tedious old nerd like me can find some answers in the dense verbiage of the WCC website, such as the table (further below), buried in Para 7.6 on the (un-numbered) page 10 (of 28) in the document in the WCC website called "CMR -EBC Detail". So to find out how it affects me personally, first I have to find</p>	<p>(f) 4A</p> <p>(g) 0A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>out which "Band" WCC chooses to put my car in, based on its "CO2 g/km emissions". In case (like me) you don't happen to know this figure for your car, you have to go to the DVLA website, put in your car's reg no, and then look for the emissions figure ascribed to your model by the DVLA. (Hard to believe, incidentally that after x years of use with varying mileage and maintenance, all cars of one model produce exactly the same CO2g/km, but never mind that now). My car is a [REDACTED] and shows 254g/kms so from WCC's email table above I'm in Band 5 (just!)</p> <p>See point 1 in Appendix 1</p> <p>(h) In accordance with the WCC website table (below), that means I am (just) in Band 5. So I think up to now I have been paying £166 p.a. - and they now want to charge me £214 p.a., an increase of about 29%. This is unreasonable and unfair, especially on anyone who can't afford a lithium heavy unrecyclable Tesla or whatever.</p> <p>(i) And with a little help from Excel, we can also calculate from the table below the overall expected increase in WCC's total revenue from residents' parking- and it is an increase of 33%. So isn't this really just a tax hike, stealthily disguised as greenwash?</p> <p>See point 2 in Appendix 1</p> <p>(j) Well, anyway, I thought I would respond to</p>	<p>(h)</p> <p>(i) 8A</p> <p>(j) The City Council's Traffic Orders web site was</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>WCC's no-reply email by using the link feedback link provided. But so far as I can see it does not lead to a feedback form or give the ID for one. Maybe it's just me. Perhaps you know how to do it?</p> <p>(k) The new charging algorithm is apparently too complicated for anyone to be told in advance how much their parking is going to cost. Apparently other London Boroughs have already gone for this system. I wonder if it is made by Fujitsu?</p> <p>Please let me know if I have got any of this wrong.</p>	<p>updated on 29th January 2024 to make it clearer how people could respond to the consultation. Submissions could be made via email or via post to WSP.</p> <p>(k) 4A</p>
5.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated Friday 26th January 2024</p>	<p>I am a Westminster resident and would like to register my concerns about the proposals. These are:</p> <p>(a) The increases in charging for older vehicles seems to fall mainly on the shoulders of lower-income groups, many of whom may be dependent on having a car because, for example, they have mobility problems or work unsocial shifts. This seems very unfair, when more affluent residents will be able to pay a fraction of the cost for their residents' permit just because they can afford expensive newer vehicles. They are still taking up just as much space for these new vehicles (particularly the fashionable SUVs).</p> <p>(b) The existing permit and parking charges have the advantage of being clear and transparent. The proposals replace this with a system that is opaque and will be difficult for many people to get to grips</p>	<p>(a) 3A, 3B</p> <p>(b) 4A, 4B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>with. Drivers parking in the area will not know what they are going to have to pay until they have already parked and input their details - this seems grossly unfair, and consumers are not normally expected to commit 'blind' to buy a service at an unknown price. The new arrangements seem retrograde and needlessly complex.</p> <p>(c) The most concerning aspect of the proposals for me is that it appears residents will be able to have up to 3 permits operating at the same time. The logic of this seems upside down, given that Westminster is trying to reduce the number of cars in the streets, not increase it. Westminster already sells substantially more residents' permits than there are parking spaces, and so the new proposals will add massively to what is already a problem in the area. Encouraging households to have additional motor vehicles in what is a central area well served by public transport seems like madness, and will simply add to the (already concerning) poor air quality.</p> <p>For older people like my husband and me, getting a parking space reasonably near to our home is very important and is becoming harder and harder particularly given the rising number of contractor vehicles parked in the streets every weekday. If households are allowed to expand the number of vehicles in this way, it will become impossible. It also appears that the most wealthy residents (who will be the most likely to take up as many permits as they are allowed to have, and can afford</p>	<p>(c) 5A, 5B, 5C</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		expensive newer cars) will gain these precious extra permits at a laughably low price. I can see no reasonable basis on which Westminster should reasonably make this change, or what possible real benefit would accrue from it.	
6.	<p>██████████ ████████████████████</p> <p>Email dated 27th January 2024</p>	<p>Can we register objections to the below-proposed changes to resident permit charges specifically targeting full electric car?</p> <p>(a) The charging infrastructure is insufficient for charging EVs. Additionally, EVs contribute zero CO2 so why are we being penalised by being charged for our resident parking permit.</p> <p>(b) Would it not be possible to create a band just for fully electric vehicles as an alternative to charging them?</p> <p>(c) The suggested solution looks like nothing to do with protecting the environment, and everything to do with raising additional funds.</p>	<p>(a) 6A, 7A</p> <p>(b) 5E</p> <p>(c) 8A</p>
7.	<p>██████████ Westminster resident ████████████████████</p> <p>Email dated 27th January 2024</p>	<p>I write in reference to the email below which asks me to provide opinions and ask questions but nowhere on any of the links could I see anywhere to do so. I found several references to decisions that have already been made so can only assume that Westminster Council has no interest whatsoever in seeking opinions from its residents. Your email address was the only thing I could find (several links deep I might add) hence this email.</p>	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(a) I understand the benefits of clean air and have made my peace with the Congestion Charge (which has nothing to do with congestion otherwise electric cars wouldn't be free) and even ULEZ as these are charges for when cars are in use and contributing to reduced air quality. However, I cannot understand how a parked diesel car affects the air quality in a different way to a parked electric vehicle, or a bicycle for that matter. Why would these be charged at different rates?</p> <p>(b) My opinion, should you or the council care and there is nothing on your email or website to suggest you do, is that this is another money grab in the midst of a cost of living crisis. You're doubling the cost of my residents' parking permit overnight. Doubling it! It's disgusting.</p>	<p>(a) 7B</p> <p>(b) 8A, 3E, 3C</p>
8.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 27th January 2024</p>	<p>The idea, concept and framework is great.</p> <p>However, the proposed charges for some bands need tweaking to ensure this does not lead to unanticipated behaviours and consequences. For instance, the gap in the charges between Group 1A and Group 1B is too large, while that between Group 1B and Group 2 is too small. The same is the case in the hourly charges between electric and non-electric vehicles. I would suggest consideration be given to reducing the proposed permit charges for Group 1B and for proposed hourly charges for EVs.</p>	2B, 2C
9.	██████████	Whilst I agree with asking all cars to pay to park in	2B

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>[REDACTED]</p> <p>Email dated 27th January 2024</p>	<p>Westminster, I think your tariff for 1B should be lower and nearer the 1A level as currently there is a greater differential between the electric tariffs (1A and 1B) than the 1B and 2 tariff with tariff 2 being for much more polluting petrol driven cars.</p> <p>I would like to suggest you consider perhaps setting 1B at maybe £50 or £60 per year for a few years and then increasing this in due course as more electric cars become owned by Westminster residence. This would reinforce the fact that Westminster council wishes to encourage electric car purchase</p>	
10.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 27th January 2024</p>	<p>I strongly object to the proposed introduction of emissions based parking charges on the grounds that it exhibits a most pernicious example of administrative overreach and wokeist stupidity as follows:</p> <p>(a) I drive a 20 year old car but do extremely low miles (less than 2000 miles a year with it). You have access to my mileage data through the MOT database, but clearly have decided to just up my parking permit cost and ignore this basic detail. I'd be very happy to show to anyone that the overall emissions saved by driving an older car and looking after it far far outweigh the emissions driving a brand new, supposedly greener, EV.</p> <p>(b) The idea that encouraging me to shift to a brand new EV based vehicle (which will have generated several orders of magnitude greater emissions just to roll off the production line) by</p>	<p>(a) 7C</p> <p>(b) 7D, 8B, 9A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>charging me £70 a year more for parking is simply a ridiculous construct which can only exist in the mind of a middle ranking bureaucrat. A car costs thousands of pounds a year, no matter what car. The idea that the parking charges influence that decision at the levels proposed is just idiotic – let's at least call a spade a spade and tell me that you're raising the price parking permit, for the right for me to park on the road I've already paid tax for.</p> <p>(c) You are the local council, not the government. Surely managing emissions is something better dealt with at national level rather than piecemeal by local councils? Do you honestly believe the best way to legislate on this is to let each council decide? What an absurd position.</p> <p>(d) The proposal is a fine example of administrative overreach, which crosses all boundaries of reasonable human behaviour. The proposals are clearly designed to retroactively penalise owners of older cars. That is just plain wrong – if you want to set ridiculous rules, at least have the decency to do it in a way which people can take into consideration when buying a new car – the retroactive introduction of such a rule is simply highway robbery.</p> <p>(e) What possible decision do you expect me to take on the basis that you've raised my parking by 50% (but just £70 a year!) given that I'm driving one of the lowest possible emissions cars in Westminster over 365 days? Do you expect me to</p>	<p>(c) 10A</p> <p>(d) 8C</p> <p>(e) 7D, 9A</p>


APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>go out and buy a brand new EV costing thousands and generating orders of magnitude more emissions, not to mention rare earth metals likely using child labour? That would be beyond absurd!</p> <p>(f) If you are genuinely concerned with emissions, why not take a look at traffic light timings. The system used to control them was designed in the 1980s. It's a basic clock and a detector which can't "see" stationary cars. And then maybe consider whether the other fine example of recent bureaucratic stupidity of 20 mph zones, which results in a significantly reduced road capacity and hence a larger number of stationary cars and greater emissions is all it was cracked up to be.</p> <p>(g) And once you've done that and decided that after all you need the extra revenue, then do me a favour and at least have the decency to call the parking permit raise what it is – a tax raise because we've decided, rather than greenwashing the messaging with wokeism – that is adding insult to injury.</p>	<p>(f) 10B</p> <p>(g) 8A</p>
11.	<p>██████████ ██████████</p> <p>Email dated 27th January 2024</p>	<p>I write with regard to the proposal by Westminster Council to increase resident parking charges from April 2024.</p> <p>(a) Firstly, there is no information on your website or in the email received of how residents can participate in the consultation. It details the proposals and states that the public can participate</p>	<p>(a) 8D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>- yet does not provide any details on how to participate. ie Westminster City Council - Council, government and democracy (westminstertransportationservices.co.uk). This is a cynical way of minimising objections from the public.</p> <p>(b) The proposals are an outrage. The council must be tone deaf given the widespread anger that has ensued following Sadiq Khan's expansion of the ULEZ charging zone. It has been proven that despite all the false information provided by the Mayor, that only 1 death has been attributable to air quality. It has clearly been a cynical cash grab and a way of fleecing the motorist, based on lies and false statistics.</p> <p>(c) It is very disappointing therefore, that Westminster council has decided that they too would like to participate in this unjustified manner of meeting budget deficits by fleecing resident motorists. You will note that in recent years, annual permit prices have increased at rates far exceeding inflation whilst quietly eliminating parking space, and should these proposals be allowed to go ahead, the cost of my annual permit will have doubled in just a few years. I have a 1.4 litre petrol basic car which cannot under any definition be considered to be the highest polluting vehicle.</p> <p>It is clearly a cash grab which should be cancelled immediately. Justifying this move according to what other councils are doing is a cynical way to justify</p>	<p>(b) 8A, 11A. It should be noted that proposals aimed at improving air quality do not solely focus on preventing deaths but rather on improving the quality of the environment for everyone, including those with respiratory conditions or developing lungs, such as young children.</p> <p>(c) 3C, 7G</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>the unjustifiable.</p> <p>Further, you will be penalising low paid resident workers. They are not in a position to buy or lease Teslas or the latest electric vehicles, which I also note you will be increasing charges for despite having zero emissions.</p> <p>The electorate is watching.</p> <p>Further the information suggests that increasing these charges allows the council to meet Net Zero targets. So in effect, I interpret that to mean you are making the cost of motoring prohibitive, or are trying to cash in from residents who need their cars to get to work are dependent on their vehicles and unable to spend tens of thousands "upgrading" to electric vehicles that they cannot charge from their flats.</p> <p>This is an awful betrayal of the electorate. Cancel this unjustified cash grab immediately.</p>	<p>(d) 3A, 7A</p>
12.	<p></p> <p>Email dated 27th January 2024</p>	<p>(a) Your ridiculous attempt to justify the emissions-based charges for residents parking are just a smokescreen for raking in cash.</p> <p>Everybody wants to have a clean vehicle and reduce their emissions.</p> <p>When they choose to upgrade will not be influenced by your parking policy.</p>	<p>(a) 8A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(b) It will depend firstly on availability of on street charging then by the age of their existing vehicle.</p> <p>(c) This over complicated charging structure will have no effect on people's decisions.</p> <p>(d) You should instead practice what you preach and make urgent increases in the number of charging points in the borough and stop virtue signalling.</p>	<p>(b) 7D</p> <p>(c) 4A</p> <p>(d) 6A</p>
13.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 27th January 2024</p>	<p>Re the below email, it is not enormously clear whether this is the way you wanted to receive feedback, but I'm hoping it is...</p> <p>I would greatly support the proposals, in spite of the increased cost to us, we need to do everything possible to discourage polluting cars in Westminster for the sake of everyone's health, especially children.</p>	Noted. (2A)
14.	<p>██████████</p> <p>Resident</p> <p>████████████████████</p> <p>Email dated 27th January 2024</p>	<p>I write in response to the traffic order consultation (pursuant to your email of 27 January 2024). My view is set out below:</p> <p>(a) The level of the parking charges will not deter drivers in Westminster (arguably one of the wealthiest boroughs in the UK) from driving cars that generate high levels of emissions. Many in the borough own high emission cars as status symbol. Charging these individuals more for parking is simply another form of taxation - it is wrong to suggest that ratcheted charges for higher</p>	(a) 7H

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>emissions cars will “reduce air pollution” as you say in bullet point 1 below.</p> <p>(b) Those that want to avoid the higher parking charges but cannot afford to move to a lower emission car will be unduly penalised by higher parking costs. You might consider charging those with new cars (those that spend £50k plus on new cars in the last 10 years) a higher parking charge as they can clearly afford higher parking costs.</p> <p>(c) Please check whether the change in parking charges has in fact reduced the level of emissions in other boroughs that have introduced this parking charging model. I would guess it has not reduced the emissions levels at all and simply allowed the relevant council to collect more in parking charges. If the intention is to reduce the levels of emissions, this charging model may not be the solution.</p> <p>(d) I would agree that those in electric cars should pay for parking - the cost should be same for those in electric cars given they receive the same utility from a parking space.</p>	<p>(b) 3A</p> <p>(c) 11A, 8A</p> <p>(d) Noted. (2D)</p>
15.	<p>██████████ ██████████ Email dated 28th January 2024</p>	<p>I am writing to oppose to the changes proposed. Whilst I understand the rationale of rising the fees for non-eco vehicles, the suggestion to raise the fees for eco vehicles, both for parking permits and pay to park (where the 10 minutes cap will be removed) makes absolutely no sense and will achieve the opposite effect. Electric vehicles are more expensive to purchase than petrol or diesel</p>	7D

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>ones, and having zero fees for parking payments and a 10 minute cap for pay to park helps ease the burden. However in your proposal this will no longer be the case. I drive electric and need to replace my car: I have just done the numbers under the proposed scheme for my regular usage and I can no longer afford it! You are forcing me to cancel my order for the new car and buy a petrol vehicle instead! Even with the raised fees for non-eco, for someone that lives in Westminster, and works and runs errands, go to lessons, school, etc in other Westminster zones, is a much better deal to buy petrol under the new scheme!</p> <p>How is this a desired outcome according to the rationale you expose in your proposal? How penalising eco drivers will get you to lowered emission? I understand the non-eco raises, but raising the eco is beyond any logic to me.</p>	
16.	<p>██████████ Resident ██████████ ██████████ Email dated 28th January 2024</p>	<p>(a) The email sent announcing changes starts “Information regarding charges for Resident Permits. We want your views”. However, it is extremely difficult to give feedback in the consultation about the proposed changes, as no direct links or automated forms are provided to enable this. A consultation which it is difficult to take part in is not an adequate consultation.</p> <p>(b) The changes penalise drivers who are unable to afford to exchange their car for an electric vehicle, which is generally more expensive for an equivalent type. They are therefore unfair, and the</p>	<p>(a) 8D</p> <p>(b) 3A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>reference to a Fairer Westminster strategy is misleading.</p> <p>(c) The changes are presented as aiming to reduce emissions, but parked cars produce no emissions.</p> <p>(d) The amounts raised by the changes are an increase on amounts currently raised, in excess of inflation. This is not justified.</p>	<p>(c) 7B</p> <p>(d) 3C</p>
17.	<p>██████████</p> <p>██</p> <p>Email dated 28th January 2024</p>	<p>(a) May I start by asking - why have you made it deliberately difficult to object to the new parking charges?</p> <p>None of the links in the below email or on your website offer any way to submit an online objection to the charges, which are quite frankly outrageous. Only after opening the PDF at the very bottom of the website do, you see methods to manually object to this via email, appointment or writing. Is this a deliberate attempt to limit the amount of objections on this pretty poor plan that has been put forwards?</p> <p>(b) The 33% cost increase for my specific car which I bought in good faith as being a relatively new petrol car (██████████) is ridiculous.</p> <p>(c) Also, as an avid motorcycle rider, before there would be no cost to add my motorbike to my policy as a second vehicle and now you are expecting me to pay £50 loading for a second</p>	<p>(a) The City Council replied on 29th January 2024: "Thanks for your mail. I have forwarded your comments to the consultation mailbox so that they are formally considered as part of the consultation.</p> <p>"I am sorry that you feel that the instructions regarding how to submit a representation were hidden away. This was not our intention and we have subsequently added info online to make these instructions clearer." (8D)</p> <p>(b) 3C</p> <p>(c) 5D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>“vehicle” and then £60.99 for the motorcycle permit - this is borderline ridiculous.</p> <p>This is simply taxing average Westminster residents out of parking in the borough and I'm very unhappy about it.</p> <p>(d) RBKC whilst costing slightly more overall allow their resident permits to be used BOROUGH-WIDE and so actually have real use and value for encouraging residents to stay in borough and shop and use the facilities on offer more locally. They also have much more sensible motorcycle rates.</p> <p>If you were to revamp the entire Westminster resident scheme to actually allow residents to park all over the borough like RBKC do there might be some overall value to the uplift in costs, as things are now, this is simply price gouging disguised as environmentally friendly legislation.</p> <p>(e) I'd be fascinated to know what percentage of Westminster residents are the actual cause of your emissions issues, I'd imagine they are a small fraction compared to visitors and passing traffic - however you have conveniently left that out of any of your workings - again not impressive. We already have ULEZ which is one of the strictest emissions zones in the world at present which wholly encompasses the Westminster borough, surely that is doing more than enough to gradually shift the issue in the right direction without further taxation.</p>	<p>(d) 10C</p> <p>(e) 11B, 7B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(f) This whole concept needs a complete rethink as stated above it is simply price gouging, I'm surprised this was slipped out so late and with so little notice with a start date of April the 1st.</p> <p>Very unhappy with this.</p>	<p>(f) 8E</p>
<p>18.</p>	<p>██████████ ██████████ Email dated 28th January 2024</p>	<p>I object to the proposed changes set out in today's email to residents and in the linked document 'Tariff & Permit Pricing Restructure (Emissions Based Charging) on the following grounds:</p> <p>(a) As ever, these changes penalise those lower income households who are unable to change their vehicles to newer models with fewer emissions.</p> <p>(b) These households are often reliant on vehicles. In my own instance, I am an unpaid carer for ██████████ ██████████</p> <p>(c) It is worth noting that since this Westminster Council fell under labour party control other more basic and fundamental environmental measures have declined. My neighbours in W2 noticed within weeks the deterioration in public sanitation and street cleaning services.</p> <p>(d) Punitive street parking charges, which are also under consideration in this scheme, and</p>	<p>(a) 3A</p> <p>(b) 3B</p> <p>(c) 10D</p> <p>(d) 3A, 12A</p>


APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>prevalent within other boroughs such as Islington and Camden have seen serious negative impacts on local businesses. I live just outside the congestion zone and can no longer use many of the shops and services I used to in W1 since the current mayor introduced charging at weekends. I therefore used to rely more heavily on services and shops in neighbouring boroughs such as Camden and Islington. However, punitive street parking charges mean this is no longer an option. The local businesses have all reported the serious downtown in trade following the merciless parking charges introduced by these labour run boroughs. It is lamentable that Westminster's previously enlightened approach to parking - which did not seek to punish lower income households is now under assault.</p>	
19.	<p>██████████ ██ Email dated 28th January 2024</p>	<p>(a) I have received an email with regards to 'City of Westminster Parking Services - Resident Permit Changes' asking for participation, but no-where on the given links is it possible to participate or give an opinion.</p> <p>(b) I would not think that Westminster has one of the worst pollutions in London – other boroughs have much more traffic clogged up on main roads as side roads have been closed to most traffic. That's for both electric and non-electric vehicles. The rest is just buses and taxis.</p> <p>(c) In your consideration you also need to take into account the production of the batteries – it's</p>	<p>(a) 8D</p> <p>(b) 11A</p> <p>(c) 9A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>basically partially destroying the other side of the planet. And it very much feels like electricity comes out of a plug – but how you produce electricity does count as well – and nuclear energy is not clean, which everyone working in the sector will be able to explain to you.</p> <p>(d) The early adopters for electric cars are done – now a more affordable electric vehicles need to be made available.</p> <p>Plus this government likes to go with the wind. Diesel was very much promoted by the government, and from one day to the next Diesel seems to be the worst enemy of it all. People have based expensive decisions on the original recommendation, and cannot just from one day to the next change. I suggest making an informed decision before you announce any strategic decisions might help.</p> <p>(e) With regards to parking charges – I once wanted to pay for kerbside parking in Fulham – but it was so complicated to do that I just took my car into the free Waitrose carpark instead.</p> <p>(f) A car is a car – it is taking up space. The bigger the car, the bigger the battery, the heavier the car the more electricity it uses... there are plenty of big cars in Westminster. These people do not care about their parking charges. The ones who do are the ones with small, mostly non-electric cars.</p>	<p>(d) 7D, 7E</p> <p>(e) 4A</p> <p>(f) 7H</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(g) What worries me a lot more is the wild west that both electric and non-electric bikes (and scooters) have brought into the city. Unless something is done soon, you will have a day when there will be many many deaths caused by their own faults. The number of bikes going over red lights while the other side is green for cars is phenomenal. They just don't seem to care. Today there were some overcool bikes going over red corner Wigmore Street / Portman Street around 14:30-14:40, a car on green had to stop. Agan today I saw a person on an electric scooter going down Brixton Hill at well over 30km/h. On Thursday at 19:07, I had a motorbike scooter speeding through a red light, this time from Portman Square into Orchard Street / corner Wigmore Street – I had just crossed it under pedestrian green light. I actually don't feel safe as a pedestrian anymore. Any comments welcome.</p>	<p>(g) 10E</p>
<p>20.</p>	<p> Email dated 28th January 2024</p>	<p>I am a resident in Westminster and I am writing about the proposed changes to resident parking permits and the pay to park fee across Westminster.</p> <p>I feel it was a very good idea to allow big concessions on EVs on both resident permits and pay to park as this encouraged a big take of EVs and usage of EVs on daily commute instead of using other less sustainable transport methods across the borough.</p>	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>The changes to the resident permits are minimal however the removal to the parking concessions for EVs I think is a very bad idea. It is unclear how many users will keep using their EVs for commuting. We are also taking away incentives from people to move from ICE to EV car. I feel this decision must be revisited and reversed, at the very least for the pay to park.</p> <p>For all these reasons I strongly object to these changes in particular to the removal of concessions of EVs.</p>	7D, 12B
21.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 28th January 2024</p>	<p>(a) I assume that your proposals if/when implemented will result in increased revenue for you.</p> <p>#7.4.1 of your 26/6/23 Cabinet Member Report says the case of Cran v London Borough of Camden (1995) RTR 346, doesn't allow a LA, in setting the charges for parking, to take account of "extraneous financial matters" such as the aim of generating revenue for other Council projects. So, as you say, as long as the Cran case remains the law, the Council cannot set or increase its charges with the motive of generating revenue.</p> <p>But you also explain the 2015 Chaumeton case conveniently (for LAs) established the principle "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</p>	(a) 8A

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>are consistent with the duty contained in section 122” of the RTRA 1984</p> <p>I am the owner of a (petrol electric), [REDACTED] [REDACTED] which I’ve had since new. I currently pay nothing for my ResPark. DVLC rate it for CO2 as emitting 92 g/km, so it’ll be just in your new Band 3 with a proposed annual charge of £123.05.</p> <p>You say in your Statement of Reasons in document “8056 - Tariff and Permit Pricing Restructure (Emissions-Based Charging) - NoP” that “Westminster has some of the highest carbon emissions and worst air quality of any national local authority. Therefore, the City Council proposes to introduce emissions- based charging for ... residents’ parking permits to deliver more local positive impacts through the provision of discounts for ‘cleaner’, less polluting vehicles... The improvement of air quality is an important priority for the City Council and these policies support this aspiration” [intentional or unintentional double entendre?!]</p> <p>(b) I agree we need better air quality. But I don’t see how making me pay more for my ResPark is going to help that – you are removing my discount, not giving me a discount. You are hoping I suppose that I will trash my car altogether or replace it with a wholly electric vehicle. I need a car and replacing my current car with an all-electric one would - for me - require a far better charging point structure not only in Westminster but country wide, as well as</p>	<p>(b) 6A, 6B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>improvements in the 'between charge' ranges of all-electric vehicles</p> <p>Naturally you emphasise in your Statement of Reasons for wanting to change the parking charges regime, your desirable (& of course section 122-compliant) air quality improvement objectives.</p> <p>(c) But I would like to know, please, what use you - the City of Westminster - propose to make of the increased revenue from these changes to the parking charges to improve the air quality in the City of Westminster; so that having charged all of us more, you too are doing your bit and using the extra funds to achieve your objective of air quality improvement.</p> <p>Otherwise, one suspects you are simply trousering the money / using it for other things and hoping your residents, businesses and visitors will solve the air quality problem by throwing away their vehicles or buying less polluting ones.</p> <p>So, I object to your proposals until I can see you are going to be doing your bit as well</p>	<p>(c) WSP replied to [REDACTED] on 5th February 2024 to confirm that Westminster City Council is bound by legislation to re-invest any surplus made from parking services in prescribed transport related activities only. This is recorded through a memorandum statement, the Parking Places Reserve Account (PPRA), which details the Parking surplus and how it has been reinvested. In 2022/23 for example, the four main areas of funding were highways and transportation improvements / maintenance, environmental improvements and street cleansing, concessionary fares and Home to School transport. However, the City Council is not able to specifically ring-fence monies generated from one particular scheme or schemes to pay for another specific project or scheme.</p> <p>Further information on the PPRA can be found in the City Council's Parking Annual Report 2022-23 on the following web page: https://www.westminster.gov.uk/parking/parking-policy-strategy-and-initiatives/parking-policies-and-reports.</p>
22.	[REDACTED]	Thank you for the chance to contribute our views	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>██████████</p> <p>Email dated 28th January 2024</p>	<p>(which I hope is not purely perfunctory).</p> <p>I think the concept you are proposing is fine and makes common sense</p> <p>(a) HOWEVER, IF THE OBJECTIVE IS TO REDUCE EMISSIONS I DO NOT UNDERSTAND WHY YOU WOULD NOT ENCOURAGE MORE ELECTRIC VEHICLE USAGE. By charging £40 or £80 per permit (depending on the size of car) it smacks of introducing a 'revenue generation' objective rather than incentivising the right behaviour - which should be to encourage more movement to electric vehicles.</p> <p>I would suggest you make electric permits free for 2 or 3 years to get more converts</p>	<p>(a) 7A, 8D</p> <p>(b) 5F</p>
23.	<p>██████████</p> <p>██████████</p> <p>Email dated 28th January 2024</p>	<p>(a) The below email does not outline how you want us to provide our views. Do you want our view via email on this address? Please clarify.</p> <p>I object to the cost at band level 5 and 6 (particularly with the £50 add-on for diesel). The cost increase is too high. It is mostly residents from lower incomes who have higher emitting and older vehicles, so it is a significant tax on residents that are already under more financial stress. These residents already need to pay the low emission charge whenever using their vehicles.</p>	<p>(a) WSP replied to ██████████ on 30th January 2024 to clarify how she could submit comments.</p> <p>(b) 3A, 3C</p>
24.	<p>██████████</p>	<p>(a) First I want to note how incredibly difficult it was to find the relevant email address to send in</p>	<p>(a) 8D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 28th January 2024</p>	<p>comments on this proposal. It was neither a direct link in the “noreply” email nor was it contained in any of these documents which were linked to various pages: CMR - EBC Detail.pdf (westminster.gov.uk) Westminster City Council - Council, government and democracy (westminstertransportationservices.co.uk) Decision - Parking Fee Structure Review Westminster City Council (moderngov.co.uk)</p> <p>But only once I had actually found the draft TMO at 8056 - Tariff and Permit Pricing Restructure (Emissions-Based Charging) - NoP.pdf This makes effective resident engagement extremely difficult. Surely you could have added a direct link to the email address into any of those other pages or indeed the email to residents headed “City of Westminster Parking Services - Resident Permit Changes”</p> <p>(b) While I am very much in support of the underlying principle since, as the Cabinet Member Report makes clear “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” para 3.2.3, the current grouping or split of the 13 DVLA categories into 6 “groups” for residents parking has some incredibly perverse incentives/results.</p>	<p>(b) 2B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(c) For example – from Appendix H it is clear that 8 smaller city or super mini cars will fall within Group 3 including my [REDACTED] according to this table (with 92 g/km CO although according to the Government's VCA data it is 75 - Car details: Directgov - Find fuel consumption and emissions information on a new or used car (vehicle-certification-agency.gov.uk). In my case, as an [REDACTED], this means an increase from £0 to £123.05 (i.e. a 123+% increase) for a supermini car whereas Group 2 contains no less than 9 Luxury/Executive or SUV cars which, when their small electric range is exhausted or not even charged will emit substantially more from their large petrol hybrid engines than my small [REDACTED]. And yet they will consistently pay less despite taking up more room in the street, weighing considerably more and often emitting far more CO2 given the likely wealth of their owners and the likelihood that many will drive having exhausted/not charged their batteries.</p> <p>(c) Similarly when it comes to pricing, the costs should be more heavily weighted towards the more polluting vehicles. The banding or Groups again ends up with a substantial advantage for some of the more polluting vehicles. Bands 3 and 5 have over 25% in each group whereas Band 2 has only 7%. Bands 2 and 3 representing the lower polluting set of vehicles currently owned (including may of the smaller and more affordable city and supermini cars should be combined and the relative weightings in terms of pricing should be adjusted so</p>	<p>(c) 5E, 7H</p> <p>(d) 5E, 3B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>that Bands 4 and 5 (as well as U), representing the most polluting vehicles should pay considerably more – as is the case in neighbouring boroughs which have a higher top band. If the purpose is to disincentivise using heavily polluting vehicles it makes no sense to have a differential of only just over £100 between Groups 2 and 5 and even less between Groups 3 and 5. From Appendix H there is not a single supermini car in Group 6 (and only 1 in Group 5) whereas all of Group 6 I would suggest are not driven by those on low incomes or key public servants such as nurses and other shift workers for example who may need their smaller supermini or city car for work purposes.</p> <p>(d) For this reason I consider the equalities impact analysis to be flawed. It appears that the impact on the elderly (as distinct from those with disabilities) has not been analysed properly since this is the statement provide in the EQIA:</p> <p>(e) <i>Data not collected but it is expected it would be in line with UK licence holders: in April 2022</i> And it makes the statement (unsupported) that there is no impact on those aged 50+ However, those over state retirement age will be severely impacted if, as in my case, their small and relatively low emitting car is charged at the proposed rate when other larger luxury cars which emit more CO2 and particulates are not charged proportionately. We should be disincentivising those highly polluting cars more than the cheaper more accessible and less polluting hybrid superminis and city cars more</p>	<p>(d) 3A, 7J</p> <p>(e) 11A, 3A, 7H</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>often owned by elderly drivers and those on low incomes who could not afford to buy second-hand luxury/executive models in Groups 5 and 6.</p> <p>(f) Incidentally, why, when one opens the EQIA from this link on this page of the WCC website - Decision - Parking Fee Structure Review Westminster City Council (moderngov.co.uk) (also pretty deeply embedded in your web site so not accessible to many I would argue) does it appear as a SURREY COUNTY COUNCIL document and why has it not been updated since March 2018 with more accurate and up-to date data? SURREY COUNTY COUNCIL (moderngov.co.uk)</p>	<p>(f) The EQIA written by Surrey County Council was used as a starting point for Westminster City Council's own EQIA document. Unfortunately, the meta data was not updated after the Westminster document had been drafted.</p>
25.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 28th January 2024</p>	<p>I am writing as a Westminster resident to object to the proposals in the emissions-based charging regime Westminster wants to adopt in the strongest terms, particularly for residents.</p> <p>(a) The proposals appeal to a sense of moral obligation about the City of Westminster having some of the highest carbon emissions and worst air quality of any national local authority but the assertion is disingenuous as a precursor to applying parking charges. The principal reason it suffers from high carbon emissions and poor air quality is because of its location in central London as a conduit for people travelling through the city, rather than the parking of people that live there, or even visitors. The very premise underlying the introduction of the charges is therefore misguided. Wider measures, such as ULEZ, are the answer to</p>	<p>(a) 7B, 11A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>the problem. Where is the evidence to support your claim? What has happened in other boroughs?</p> <p>(b) While I don't object to the principle of emissions-based charging, which we have had in some form already (no charges for eco vehicles for example), the quantum of the charges are punitive and the lead in time is too short for such a drastic measure. Moreover, the provision of electric charging in the borough is woefully inadequate and cannot accommodate the move Westminster is promoting to greater adoption of electric vehicles. The logic of charging for the lowest polluting cars also does not align with the stated intention. If Westminster is rewarding good environmental practice why create a charge for even the most environmental of eco vehicles? Why also charge more for two vehicles (which could be two electric vehicles) and allow 3? The measures are at odds with the stated intention. What justification is given for the increase to motorcycles, regardless of whether they are electric or very polluting?</p> <p>It's difficult to see this as anything other than an attempt to swell coffers. There is no mention of ringfencing parking funds to spend on green measures, which further undermines the attempt.</p>	<p>(b) 3C, 8E, 6A, 7D, 5G, 11C</p> <p>(c) 8A</p>
26.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	<p>I object to the proposed changes to resident permits:</p> <p>(a) The stated reason for the change is "to incentivise cleaner less polluting vehicles."</p>	<p>(a) 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	Email dated 28 th January 2024	<p>However, the proposal is to charge EVs. Those two things don't match up.</p> <p>I bought my EV partly because I would not have to pay resident parking permits.</p> <p>(b) The change is being brought in at very short notice. That is in stark contrast with the long notice TfL has provided regarding EV's being no longer eligible for a discount regarding the congestion charge from 2025.</p> <p>(c) If it is a revenue generating measure for the council, just say so. Don't dress it up in some other (incorrect) manner.</p>	<p>(b) 8E</p> <p>(c) 8A</p>
27.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 29th January 2024</p>	<p>I am objecting to the revised pricing structure for EVs that has been proposed for mid-March.</p> <p>(a) The increase is disproportionately high compared to the current scheme by a factor of 1800%</p> <p>(b) It is out of phase with the Cleaner Vehicle Discount, which is expected to be removed on December 25, 2025</p> <p>(c) EV take up is still not in the mainstream. New cars accounted for 19.7% of all sales in December 2023. EV drivers will not contribute significantly to parking revenue in the short term.</p>	<p>(a) 3C, 3D</p> <p>(b) 8E</p> <p>(c) 7D</p>
28.	[REDACTED]	I object on the grounds that the proposals unfairly	5E

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 29th January 2024</p>	<p>penalise owners of larger cars with CO2 emission figure over 225g/km but were registered before 23 March 2006 which are given special status under existing Government and DVLA Vehicle Tax rates.</p> <p>Whilst I accept and agree that amendments to parking charges and permit charges will be necessary from time to time my understanding of the new bands for Resident's Parking Permits suggests a divergence from Government and DVLA Vehicle Tax Bands. The rates for vehicles registered between 1 March 2001 and 31 March 2017 include an arrangement to include cars with a CO2 figure over 225g/km but were registered before 23 March 2006 to pay vehicle tax at Band K level. https://www.gov.uk/vehicle-tax-rate-tables/rates-for-cars-registered-on-or-after-1-march-2001</p> <p>I believe the proposed bands in the new proposals section at B2. Proposed Residents' Permit Charges (All Zones) should include such an arrangement which could be accommodated by changing the date used for both Band 5 and Band 6 from 2001 to 2006 instead. Or indeed by including the same provision made by DVLA for certain vehicles within the 2001 dates.</p> <p><i>B2. Proposed Residents' Permit Charges (All Zones)</i> <i>(a) Residents' permit charges applicable to:</i> <i>(i) non-diesel vehicles (other than motorcycles), including electric vehicles</i></p>	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p><i>and non-diesel hybrid electric vehicles, registered in the UK from 2001 onwards; and</i></p> <p><i>(ii) diesel vehicles (other than motorcycles), including diesel hybrid electric vehicles, registered in the UK from 2015 onwards:</i></p> <p>This would seem fairer to residents with certain older vehicles and keep WCC arrangements in line with existing UK Government Vehicle Tax structures.</p> <p>I personally would be happy to pay more for my permit but not the same as that for a brand-new car. I believe my own vehicle should fall within the proposed new Band 5 and not Band 6 as it would if these proposals are implemented as is.</p>	
29.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 28th January 2024</p>	<p>Can I clarify/ confirm whether full EV cars will continue to pay the minimum 10 minutes for the 4 hours in order to encourage visitors to drive into Westminster with much cleaner cars which I have seen personally work as a policy.</p>	<p>The City Council replied to ██████████ on 29th January 2024 to clarify that the 10 minutes' EV concession is due to be withdrawn with the implementation of emissions-based charging. Each EV would be charged the proposed band 1 zonal charge dependent upon location -</p> <ul style="list-style-type: none"> • A zone - £3.18 p/hr • B zone - £2.58 p/hr • C zone - £1.46 p/hr • D zone - £2.13 p/hr • E zone - £4.41 p/hr • F zone - £4.62 p/hr • G zone - £4.62 p/hr <p>So for example, a 45 minute stay in A zone would</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
			cost £2.38. A 4 hour stay in B zone would cost £10.32 etc.
	Email dated 29 th January 2024	To me this sounds like financial a gap that the council is trying to fill and is in no way promoting the environmental policy that we speak of.	8A
30.	[REDACTED] [REDACTED] Email dated 28 th January 2024	<p>I trust this email finds you well, I am writing to you to ask what would be the point of sending us poor citizens information regarding the proposed new payments for parking in Westminster.</p> <p>I understand Westminster wants to be at the forefront of helping the environment and cutting down on emissions from old cars but have Westminster thought about the reason why people still have these cars?</p> <p>(a) Myself, I have [REDACTED] [REDACTED]. Some of whom cannot drive, thus, when we go out we perhaps to dinner at another relative's home or to further a fields such as the seaside. It is much more cost effective and convenient to sit together and go together, I drive a [REDACTED] old but gets my family and I from A to b. It's nearly [REDACTED] years old. Would I like a new [REDACTED]? Of course I would, however, could I afford a new [REDACTED] of course I cannot. Hence, I try to keep my car in the best possible condition I can as out car is imperative to us all. Additionally, [REDACTED] [REDACTED] and so we need to drive things up and down throughout the year.</p>	(a) 3B

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(b) With the cost of living being so high, with new cars costing so much money how can one afford to help the environment when we can't help ourselves? It would be amazing to have a new car and help but please consider the people rather than just the cause. The £2000 scrappage scheme cannot even buy me a new steering wheel. Please do not go ahead with such plan as you need to consider how it impacts those who really have no choice.</p>	<p>(b) 3A, 3E</p>
<p>31.</p>	<p>██████████ Resident ████████████████████ Email dated 28th January 2024</p>	<p>(a) I received today an email from The City of Westminster regarding the above issue which invited public participation. The only way I could find to do that from the links is by email to you, which is why I am sending this.</p>	<p>(a) The City Council replied to ██████████ on 29th January 2024: Thank you for your mail. I have forwarded your comments to the consultation mailbox so that they are formally considered as part of the consultation.</p> <p>Incidentally, information about how to go about submitting comments or an objection is contained within the '8056 – Tariff & Permit Pricing Restructure (Emissions-Based Charging) – NoP' document on the consultation web-page, as copied below -</p> <p>5. Any objections or other representations about the proposal should be sent in writing to the Council's agents, WSP Traffic Order Team, 3rd Floor, WSP House, 70 Chancery Lane, London, WC2A 1AF, or by email to tmo.westminster@wsp.com quoting reference 8056/PJ, by 14th February 2024. All objections must specify the grounds on which they are made.</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(b) I am a pensioner with two vehicles on the same permit. One is a [REDACTED] with low emissions, which is in more regular use of the two: insured for a maximum mileage of 3,000 p.a. The other is an [REDACTED] which is largely kept outside London, since only one of them can be parked here at any one time. This is used when moving large items about or several passengers, both only occurring when occasionally required.</p> <p>Your proposed new system where each vehicle has its own permit would serve to penalize me for the time when the [REDACTED] is parked outside of Westminster and having zero effect upon local pollution. Further, it sends the message that, if you can afford to pay, you can have up to three vehicles in Westminster at any one time, rather than one under the existing system.</p> <p>(c) As my wife just commented, "This is just a revenue-raising concept, with a probable negative effect upon the environment."</p> <p>It seems absolutely evident that the Mayor of London and The City of Westminster Council have set their stalls as firmly anti-motorist and the public should take that into account in their voting intentions.</p>	<p>Your point that this was not clear is noted however, and we have since made this clearer on the website. https://www.westminster.gov.uk/parking/changes-how-we-charge-parking</p> <p>(b) 5C, 5D</p> <p>The existing system whereby two vehicles can be listed on one residents' permit does not account for differences in emissions levels between those two vehicles. As it is not practical for the City Council to determine how frequently each vehicle is used within Westminster, the simplest method is to charge each vehicle based on its own emissions level.</p> <p>(c) 8A, 11D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
32.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 28th January 2024</p>	<p>I have not found any link to express my view on the below (as the title suggests).</p> <p>I did find your name on the report. In this “Cabinet Member Report”, it states that only 9.6% of the vehicles awarded with a permit are “Eco vehicles”. Still, the project is to start putting a permit charge on these Eco vehicles. I believe it is a mistake and the Council should wait for a trigger of 20% to 25% of Eco vehicles in our streets before putting a charge. It is “too soon” to stop the incentivisation for Eco vehicles in our streets.</p> <p>The alternative would be to further increase the charge difference between Eco vehicles and combustion engines vehicles.</p>	<p>5F</p> <p>The City Council replied to [REDACTED] on 29th January 2024: Thank you for your mail. I have forwarded your comments to the consultation mailbox so that they are formally considered as part of the consultation.</p> <p>Incidentally, information about how to go about submitting comments or an objection is contained within the ‘8056 – Tariff & Permit Pricing Restructure (Emissions-Based Charging) – NoP’ document on the consultation web-page, as copied below -</p> <p>5. Any objections or other representations about the proposal should be sent in writing to the Council’s agents, WSP Traffic Order Team, 3rd Floor, WSP House, 70 Chancery Lane, London, WC2A 1AF, or by email to tmo.westminster@wsp.com quoting reference 8056/PJ, by 14th February 2024. All objections must specify the grounds on which they are made.</p> <p>Your point that this was not clear is noted however, and we have since made this clearer on the website. https://www.westminster.gov.uk/parking/changes-how-we-charge-parking</p>
33.	<p>[REDACTED]</p> <p>[REDACTED]</p>	<p>(a) If life wasn’t hard enough already we now have a proposal to charge cars more to park based on emissions. Surely if a car passes the emissions test on the MOT it should be able to be parked in</p>	<p>(a) 71</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	Email dated 28 th January 2024	<p>the street I use my car a couple of times a week it's a well maintained classic car.</p> <p>(b) I'm hit with ULEZ for the next 4 years, please can we at least afford to park our cars We pay our road taxes.</p> <p>(c) This is just another cash grab in hard working Londoners at a time when jobs are not secure and the cost of living is increasing.</p>	<p>(b) 3C</p> <p>(c) 8A, 3E</p>
34.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 29th January 2024</p>	<p>(a) The new proposed parking fees being based on CO2 emissions is an unfair decision. And it discriminates against those who are less financially stable. We are already paying road tax based on CO2 emissions, then on top of that we have the ULEZ zone where cars have to meet a certain standard or pay a fee.</p> <p>(b) Parking requires space, and if you were to make the fee based on the size of the vehicle would make more welcomed.</p>	<p>(a) 3A</p> <p>(b) 7I</p>
35.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 29th January 2024</p>	<p>(a) This is fundamentally wrong.</p> <p>You should encourage electric cars. Other cars should be taxed based upon milage used (which can be checked on all MOT certificates).</p> <p>(b) My ██████████ does about 500-600 miles a year and I pay £15 a day to park/drive it. Whereas all current diesel taxis do 60,000 miles a year and pay ZERO!!!</p>	<p>(a) 7D, 7I</p> <p>(b) The Mayor of London provided the following response to a similar concern in 2019: "Historically, taxi drivers have had a limited choice of</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
			<p>heavy diesel vehicles to use and this has led to the taxi fleet becoming a significant contributor to poor air quality, particularly in central London.</p> <p>“Taxis are not in scope of the ULEZ because they are legally obliged to use a certain type of vehicle that is purpose designed for London’s unique street network and fully accessible to wheelchair users. However, Transport for London (TfL) has set strict licensing requirements which came into force from the beginning of 2018, designed to speed up the replacement of dirty diesel taxis with electric vehicles, with the support of dedicated charge points. The licencing requirements far exceed the ULEZ emission standards and mean that no more diesel taxis are being licensed and all new taxis must be zero emission capable.</p> <p>“However, I continue to look across all modes of transport to address London’s air quality challenges and the taxi trade must do its part even though drivers are exempt from the ULEZ. TfL has recently consulted on a proposal to reduce the maximum age limit of older diesel taxis (currently 15 years) to 12 years by 2022. Subject to the outcome of the consultation, TfL estimate this proposal would reduce taxi NOx emissions in central London by up to 14 per cent in 2019 and by at least 65 per cent by 2025, which is necessary to meet legal obligations.”</p> <p>The proposal referred to by the Mayor was subsequently approved and as of 1st November 2022, the maximum age for a taxi is 12 years for</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
			<p>Euro 3, 4 or 5 diesel taxis; and 15 years for Euro 6 diesel taxis, newly converted LPG taxis and ZEC taxis.</p> <p>Further information is available at: https://tfl.gov.uk/info-for/taxis-and-private-hire/emissions-standards-for-taxis and https://tfl.gov.uk/info-for/taxis-and-private-hire/emissions-standards-for-phvs.</p>
36.	<p>██████████ ████████████████████ Email dated 29th January 2024</p>	<p>I have just read your email regarding your changes to resident permit costs in Westminster. I would just like to say how horrified I am by your new proposal. I have recently switched to an electric vehicle because I firmly believe in my contribution to cleaner air and zero emissions. But instead of being recognised for this, you have now suddenly decided that my residents permit charge should now be increased from £0 to £80 a year. Where is the incentive or the fairness in that? I feel utterly cheated by this move on your part and ask for this decision to be reconsidered.</p>	7E
37.	<p>██████████ [private comments redacted from email] ████████████████████ Email dated 28th January 2024</p>	<p>(a) Sorry to be a pain, and it might just be me doing something stupid, but I can't for the life of me find a link to the consultation.</p> <p>I've clicked on every link in the email, then each link on the pages that takes me to, but none of them seem to give me a form to fill in or an address to send comments to.</p> <p>Is there a specific link for that?</p>	<p>(a) The City Council replied to ██████████ on 29th January 2024 clarifying where the consultation could be viewed and advising that the method for submitting comments had since been made clearer on the relevant websites, such as https://www.westminster.gov.uk/parking/changes-how-we-charge-parking.</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		(b) I'm all in favour btw. It will get me a permit for my other car so I won't need to hire a space in the church car park.	(b) Noted. (2A)
38.	<p>██████████ Business Owner</p> <p>████████████████████</p> <p>Email dated 29th January 2024</p>	<p>(a) I hope this message finds you well. I am writing to express my strong opposition to the proposed increase in parking charges for electric cars in Westminster. While I understand the need for local authorities to manage parking and traffic effectively, I believe that the short notice and the potential discouragement of electric vehicle usage could have detrimental effects on our collective efforts to reduce pollution and promote sustainable transportation.</p> <p>Firstly, the short notice given for this proposed increase is concerning. A sudden change in parking charges for electric cars does not allow sufficient time for residents and businesses to adapt to the new fee structure. Such abrupt changes may inadvertently discourage individuals from adopting electric vehicles, which contradicts the broader efforts to incentivize eco-friendly modes of transportation.</p> <p>(b) Furthermore, electric cars play a crucial role in mitigating air pollution and reducing our carbon footprint. Penalizing electric vehicle owners through increased parking charges sends a conflicting message about the council's commitment to environmental sustainability. Encouraging the use of electric cars should be a priority for local</p>	<p>(a) 8E, 7D</p> <p>(b) 7A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>authorities, and any measures taken should be carefully considered to avoid undermining the progress made in this area.</p> <p>(c) Additionally, the complexity of the proposed parking fee structure adds an unnecessary burden for electric vehicle owners. A clear and straightforward fee system is essential for promoting accessibility and encouraging the widespread adoption of electric cars. The added complexity may discourage potential electric vehicle users, hindering the transition to cleaner and more sustainable modes of transportation.</p> <p>In conclusion, I urge the Westminster council to reconsider the proposed increase in parking charges for electric cars. A more thoughtful and well-planned approach is necessary to ensure that the transition to electric vehicles is smooth, and that residents are encouraged rather than discouraged to make eco-friendly choices.</p> <p>Thank you for considering my concerns. I trust that the council will carefully evaluate the potential impacts of this proposal on the community and the environment.</p>	<p>(c) 4A</p>
40.	<p>██████████ ██████████ ██████████ ██████████</p>	<p>I have a couple of points to make regarding the e-mail sent on 26/01/2024 23:10 "Information regarding charges for Resident Permits". It says:</p> <p>(a) "We want your views." However, there is no link, or other obvious way to do so, hence this e-</p>	<p>(a) The City Council replied to ██████████ on 29th January 2024 clarifying where the consultation could</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	Email dated 27 th January 2024	<p>mail to both my ward councillors and those councillors with a brief for air quality.</p> <p>(b) “We propose to change the way we charge for both pay-to-park casual kerbside parking and resident parking permits to incentivise cleaner, less polluting vehicles.” If the objective of these charges is truly "To reduce air pollution", how does introducing an added expense for zero emission vehicles help to do so? It will probably have the opposite effect.</p> <p>(c) Please tell me the logic of different charges for different size zero emission vehicles.</p> <p>(d) It's clear that the one of the motivations behind these changes has been the realisation that permit revenue would soon reduce alarmingly if electric vehicles were not brought 'within the fold'. No one should reasonably object to paying a fair charge for residents' parking - I have no such objection - but it annoys voters to be handed such obvious 'old flannel'. It just feels like more of the same old dishonesty and sleight of hand we have, sadly, become used to from the political parties. Straightforwardness and honesty in politics is the rarest of creatures but it might, perhaps, produce positive results..?</p>	<p>be viewed and advising that the method for submitting comments had since been made clearer on the relevant websites, such as https://www.westminster.gov.uk/parking/changes-how-we-charge-parking.</p> <p>(b) 7D</p> <p>(c) 11E</p> <p>(d) 8A</p>
41.		I object to these proposals on the grounds that	7I

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>██████████</p> <p>Email dated 29th January 2024</p>	<p>classic cars are subject to the punitive unknown rate.</p> <p>I have a ██████████ car that does less than 2,000 miles a year almost all of them outside London. It has a negligible effect on emissions.</p> <p>Virtually no ██████████ car will be used daily or do high mileages. It would be straightforward to give a lower rate for classic cars that don't do high mileages.</p> <p>From personal experience I can tell you classic cars bring pleasure to people of all ages in London - people take pictures of themselves and the vehicles and start conversations they wouldn't otherwise - they brighten people's lives.</p>	
42.	<p>██████████</p> <p>██████████</p> <p>Email dated 29th January 2024</p>	<p>(a) I have been sent the attached email regarding changes to the residents parking permits in Westminster but cannot see how I am able to express my views - I cannot see which link leads to this option so am emailing my questions to you.</p> <p>(b) Can you please advise why vehicles that park in Westminster need to be categorised by their emissions when this is already charged within the ULEZ scheme? Parking a car does not generate emissions and we pay each time we move our car anyway.</p>	<p>(a) The City Council replied to ██████████ on 29th January 2024 clarifying where the consultation could be viewed and advising that the method for submitting comments had since been made clearer on the relevant websites, such as https://www.westminster.gov.uk/parking/changes-how-we-charge-parking.</p> <p>(b) 7B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(c) Charging twice for the same thing does not seem at all fair, and appears to be yet another money making exercise for the council.</p> <p>I look forward to your explanation.</p>	<p>(c) 8A</p>
43.	<p>██████████ Resident ████████████████████ Email dated 27th January 2024</p>	<p>(a) Could you please ask your colleagues at the Council to fix the link for the consultation for the below. It does not work and we would all like to be able to give constructive comments.</p> <p>(b) Overall, the spirit of these changes are great, but some detail is worth mentioning.</p> <p>(c) EVs should only start contributing to parking charges when an agreed proportion of cars are EVs (e.g. 40%). Polluting cars need to pick up that extra cost. The incentive to switch is then greater for longer.</p> <p>(d) One of the biggest hurdles to switch to EVs remains the availability of charging stations. Westminster has done well in the past 3-4 years, but on a per capita basis there is still more to do. If the council push for more EV's in the absence of increasingly more chargers then this could create a backlash. Pure EV switches would suffer, Hybrids would take some of the slack and EV's overall will become a "class" object whereby many cannot afford to switch due to charging access (flat owners</p>	<p>(a) The City Council replied to ██████████ on 29th January 2024 clarifying where the consultation could be viewed and advising that the method for submitting comments had since been made clearer on the relevant websites, such as https://www.westminster.gov.uk/parking/changes-how-we-charge-parking.</p> <p>(b) 2E</p> <p>(c) 5F</p> <p>(d) 6A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>do not have driveways).</p> <p>(e) The additional cost for extra cars should be much steeper, i.e. 3rd car should attract extra £250 rather than £100 as this may help releasing more parking spaces. Those that have 2nd or 3rd cars per person can afford it.</p> <p>I hope my comments are helpful and pragmatic for the relevant council team to look into the proposed rollout.</p>	(e) 2E
44.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 29th January 2024</p>	<p>We want to object to proposed Westminster parking changes.</p> <p>Current charges are already extremely high for residents.</p>	3C
45.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 29th January 2024</p>	<p>(a) The increase to residents such as myself as an elderly driver are one more charge for my vehicle and although I use public transport as much as I can there are times I need a car. I can no longer carry large objects. I believe the over 65 or more should have free residents parking.</p> <p>(b) From residents parking which has been free for a decade or more due to being a hybrid the charge goes to £240. One buys these vehicle to help the air quality. The vehicles in the now recognised slowest moving city in the World are rarely above the 10 mph which is run if Hybrid</p>	<p>(a) 3B, 3C. The emissions-based charging proposals are intended to reduce CO2 emissions and are, therefore, centred around the emissions level of the vehicle rather than the age of the driver. Where a resident meets certain health / mobility criteria, the City Council provides the free White Badge scheme which allows the permit holder to park for free in residents' parking places and pay-to-park bays.</p> <p>(b) 7E, 6A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>solely on battery. I should add as I am sure Westminster is aware charging points in SW1 are not exactly abundant and expensive compared to the impossibility of Home charging points unless run across the Road and Pavements from our terraced Houses.</p> <p>(c) The allowing of 3 vehicles per resident in Central London will no doubt raise the number of vehicles in our Street and cause far more output of omissions than anything else and frankly is absurd.</p> <p>(d) Is it all about money in reality? The Congestion charging already charges us as residents £1.50 a journey to any part of our own neighbourhood.</p> <p>(e) If Westminster really was considering the Air perhaps the tour buses usually not in prime, rarely with many people, always in central London could be curtailed. The London Taxis the majority seemingly still diesel which leave an oily, sooty covering over our front doors. Of course diverting the traffic in small residential streets rather than forcing them into them would also be to the residents advantage as regards air quality.</p>	<p>(c) 5A</p> <p>(d) 8A</p> <p>(e) 10B. See also 35(b) above.</p>
46.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 29th January 2024</p>	<p>(a) As the owner of a car with CO2 emissions just above the 150 cut off level it appears that my residents permit cost will rise significantly.</p> <p>And as my car is a very popular make and model ([REDACTED]) I imagine there will be very many</p>	<p>(a) 3C</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>motorists in the same position as I find myself.</p> <p>(b) A boundary of 160 not 150 might help a lot of people in a similar position.</p> <p>Such a change in my view is unlikely to have any major effect on an individual's decision re motor vehicle.</p> <p>(c) The idea of changing to an electric car has some appeal but until the nationwide infrastructure for electric supply for charging stations is improved I for one will delay any such move.</p>	<p>(b) 5E</p> <p>(c) 6A</p>
47.	<p>██████████</p> <p>██████████</p> <p>Email dated 29th January 2024</p>	<p>I would like to object to the proposal to change Westminster's parking charges as set out in the attached email, received on 28 January 2024.</p> <p>The reasons for my objection are as follows:</p> <p>(a) You say that you are introducing these changes to incentivise cleaner, less polluting vehicles. However, the latest Westminster City Council Air Quality Annual Status Report (for 2022, published in July 2023) shows that air quality in Westminster has been improving steadily over the past 8 years under the current parking charge regime, and in most cases are meeting the council's targets. Westminster's air quality is better now than it has been for many decades. There is therefore no need to penalise motorists further to achieve your objective of improving air quality.</p>	<p>(a) 11F</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(b) The relevant Cabinet report here reveals that the new parking charge structure is expected to yield an increase in income to the Council of £5.310m on Pay-to-Park, £0.840m on Resident Permits, and £0.090m on Trade Permits - a total of £6.24m pa, representing an increase of 13%. These sums represent yet another financial burden on the motorist and are being implemented by stealth - there was no mention of these sums in the email that was sent to resident permit holders. I strongly object to the Council introducing yet more taxes on the motorist, who yet again is being used by the Council as a cash cow to subsidise its inefficiencies</p>	<p>(b) 8A</p>
48.	<p>██████████ ██ ██████████ Email dated 29th January 2024</p>	<p>(a) Any change in charges should be based on mileage as well If someone does 12,000 miles in a year to 3,000 there should be a variation in pricing.</p> <p>(b) As a resident of Westminster all the new restrictions bike lanes 20mph Traffic lights on main roads that are not coordinated are adding journey time and pollution According to a friend of mine who is an engineer there are more pollution travelling at these low speeds. This 20mph should be changed to between 25 - 30 according to how much traffic is on the road</p>	<p>(a) 7C</p> <p>(b) 10B</p>
49.	<p>██████████ ██ Email dated 29th January 2024</p>	<p>(a) I think these charges are outrageous, we are all suffering from the cost of living and you're adding more financial burden on the residents of Westminster.</p>	<p>(a) 3E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(b) I live in Zone C and I can't even park outside my own property I have to in some occasions park two streets away or even worse further afield.</p> <p>(c) On carnival weekend it's even worse, Westminster put out these signs to stop parking unless you have a valid permit. This is then not managed by the enforcement officers so it becomes free for all.</p>	<p>(b) The residents' parking scheme does not guarantee a parking space or that an available parking will be close to a resident's home address. This information is provided to permit holders in the terms and conditions when applying for a permit.</p> <p>(c) Noted. The City Council's Parking Services will review enforcement levels to ensure there is compliance. It should be noted that as residents' permits are now digital, some unfamiliar vehicles may simply belong to permit holders from other areas of Zone "C".</p>
50.	<p>██████████ ██████████ Email dated 29th January 2024</p>	<p>I strongly object to the increase in the Residents' Permits, as I strongly objected to the change in the parking charges. It is as clear as it could be that this increase is only done for the purpose of raising funds. The argument of "improvement of air quality" is a myth. It is not more proportionate and it penalises users of electric vehicles.</p>	8A, 7A
51.	<p>██████████ ██████████ Email dated 29th January 2024</p>	<p>I'm against the changes as it would be a bit expensive for my car which I only replaced a year and a half ago to comply with the ULEZ.</p>	3C, 7E
52.	<p>██████████████████ ██████████████ ██████████████████</p>	<p>(a) With regard to these proposed increases, I think it is unfair to increase them as we already "pay to pollute" as it were through road tax, which is dependent on the amount of CO2 produced by any particular vehicle.</p>	(a) 3C, 3D, 7L

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	Email dated 29 th January 2024	(b) I have a small car with a 1700 cc engine, and I use this mainly for driving outside London. Taking a train to this particular destination is really not practicable. I would like to switch to an electric car at some point, but at the moment I do not think that there are anything like enough charging points. I would hope that the city council would concentrate more on providing more of these chargers, rather than trying to address the problem of pollution through increased residents parking charges.	(b) 6A
53.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 29th January 2024</p>	<p>I am writing to object to Westminster's proposal to introduce emissions-based charging for parking from 1 April, 2024.</p> <p>The grounds for my objection are:</p> <p>(a) The proposed date to introduce this charging structure gives residents no time to adjust and therefore is unreasonable. It might be reasonable to give, for example, three years notice of such a change, which would allow residents a reasonable time to take this policy into account in any decision to change their vehicle.</p> <p>(b) The consultation period is unreasonably short. Such a short period for consultation gives too little time for residents to make representations and too little time for Westminster to consider (and act upon) responses. The consultation process therefore gives the appearance of "going through the motions", perhaps with no real commitment to considering and acting upon representations.</p>	<p>(a) 5F</p> <p>(b) 8E, 8G</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(c) It is not clear what the aggregate increase in the charge will be. The proposal purports to base the policy change solely on environmental/health grounds. If this is the case, residents might assume that the aggregate increase in charges modelled under the new policy would be linked to inflation or a similar percentage to Council Tax increases. It is not clear from the consultation material whether this is the case and therefore the aggregate increase in charges (as modelled) may be unreasonable.</p>	<p>(c) The emissions-based charging structure would completely replace the previous charging regime structure and is not a percentage-based adjustment to that previous regime. As the intention behind the new structure is to encourage a shift to lower emission vehicles and other more sustainable forms of transport, the charges have been set based on the emissions level and environmental impact of the vehicle type. Further information about the increases and decreases in charges for different vehicle types are set in the City Council's November 2023 Cabinet Member Report (https://westminster.moderngov.co.uk/ieDecisionDetails.aspx?ID=1974).</p>
54.	<p>██████████ ██ Email dated 29th January 2024</p>	<p>We are being encouraged to buy and operate EV cars as part of the “incentivized” new parking tariffs for environmental reasons “to encourage the use of low-polluting vehicles and discourage the use of those that are more polluting” and “to introduce a fairer and more proportionate charging structure so vehicles are charged in accordance with the level of emissions they produce”.</p> <p>Based upon this criteria, there is no reason why a larger battery EV with 0 CO₂ emissions should be charged £80 to park versus a smaller battery EV at £40 to park. Both produce the same 0 CO₂ emissions. I thus respectfully request that the Council adjusts its charging structure for EV's to be all at the same rate.</p>	<p>(a) 11E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS						
		<p>Given that free resident parking was one of a number of incentives for switching to an EV it is disappointing that this is being removed retrospectively. It is normal practice in this country that new Governmental actions brought in subsequently are applied to only new situations/purchases. Thus these parking charges should only be applicable to EV's purchased after April 2024 and not those purchased before April 2024. I thus respectfully request that the Council applies its new charging structure for EV's to only those acquired after April 2024 and that current EV's continue to pay the same rate of £0 pa.</p>	(b) 7E, 5H						
55.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 29th January 2024</p>	<p>In general, I fully support the proposals; but with a couple of changes that I hope you take into account.</p> <table border="1" data-bbox="707 869 1296 1026"> <tbody> <tr> <td data-bbox="707 869 790 967">5</td> <td data-bbox="790 869 1146 967">151 - 255 or pre-2001 >1200cc</td> <td data-bbox="1146 869 1296 967">£214.00</td> </tr> <tr> <td data-bbox="707 967 790 1026">6</td> <td data-bbox="790 967 1146 1026">≥256 or 'unknowns' *</td> <td data-bbox="1146 967 1296 1026">£321.00</td> </tr> </tbody> </table> <p>I think the band at 5 is too wide and unfair on those vehicles that are significantly better than others. It would seem that the gov site has the following bands and for continuity, surely it would be better to follow the same system. I am not suggesting all of the small jumps; but 151- 170 would seem logical and will help many who have better; but slightly older cars that don't fall into the lower bands. As you may see, I have electric, so this is not for my car.</p>	5	151 - 255 or pre-2001 >1200cc	£214.00	6	≥256 or 'unknowns' *	£321.00	2B
5	151 - 255 or pre-2001 >1200cc	£214.00							
6	≥256 or 'unknowns' *	£321.00							

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>150 to 154 — 36 36 155 to 159 — 37 37 160 to 164 — 37 37 165 to 169 — 37 37 170 and above — 37 37</p> <p>On the other hand, I think it makes sense to put the higher band to a higher price, so anything over that is £500. Most with the most polluting cars don't really seem to be constrained by the cost, so this may encourage a change.</p>	
56.	<p>██████████ ██████████ Email dated 29th January 2024</p>	<p>Hoping this email finds you well. I am writing regarding Tariff and Permit Pricing Restructure from April 2024 proposal which is highly unlikely a constructive change as we think the charges should be started for highly polluted cars only which emissions CO2 or NOx more than 100g per miles. As you know people invested so much money to buy a cleaner car because of London Ultra Low Emissions Zone restrictions around the city and beyond. After this if Westminster parking services charges applies to cleaner cars which will be definitely a heavy burden for them at time of cost of living crisis. Please take this matter as urgent and for the time being it's very important to consider and not to charge the cleaner car up to 100 CO2/GM.</p> <p>I would like to hear the outcome from my request and please don't hesitate to contact me if needed for information.</p>	5E, 7E, 3E

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
57.	<p>██████████</p> <p>██</p> <p>Email dated 29th January 2024</p>	<p>With regards to the consultation on Westminster Resident Permits, I wish to lodge my vehement objection to the proposed plans.</p> <p>(a) Considering that one of the Council's objectives is to reduce air pollution in Westminster as part of Westminster City Council's ambitions to meet its net zero emissions by 2040, I fail to see how creating a new for charge for parking permits for electric vehicle owners who have zero emissions supports this objective.</p> <p>(b) For those residents who bought an electric vehicle to support the reduction in emission, we're now being punitively charged where no charges were in place before and for no emissions benefit.</p> <p>(c) The charges being proposed are not proportionate or fair as electric vehicle owners are now going to being charged a minimum of £40 more than the previous regime despite not producing any emissions.</p> <p>If charges are based on emissions, why is there any charge for no emission vehicles. The proposed approach is effectively a new tax on those that don't contribute to emissions.</p>	<p>(a) 7A</p> <p>(b) 7E</p> <p>(c) 7A</p>
58.	<p>██████████</p> <p>██</p> <p>██████████</p>	<p>I object most strongly to the proposals as outlined on your webpage and also in the email sent to me on 28 January 2024.</p> <p>The grounds on which I object are that you state</p>	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	Email dated 29 th January 2024	<p>that the changes are to reduce carbon emissions in Westminster:</p> <p><i>The City of Westminster has some of the highest carbon emissions and worst air quality of any national local authority. Therefore, we propose to introduce emissions-based charging for both pay-to-park casual kerbside parking and residents' parking permits to incentivise cleaner less polluting vehicles.</i></p> <p>(a) It is baffling therefore that you intend to increase parking charges for fully electric vehicles and to charge a permit fee for residents who own electric vehicles. No fully electric EV contributes to any carbon emissions in Westminster and hence does not meet the premise of the proposed changes.</p> <p>(b) To say that the carbon footprint of the manufacture of the vehicle is taken into account is spurious in the extreme. Many of these cars are manufactured in another country and so have no impact on the emissions in Westminster. Indeed, one might say that the inflated prices paid for such vehicles pays for any additional carbon footprint that might result in their manufacture. Hence the buyer is already paying for that carbon footprint.</p> <p>(c) The proposed tariff on EVs is clearly some sort of money-grab and has little to do with reducing emissions in Westminster. It is ridiculous to think that this is anything other than that, and you</p>	<p>(a) 7A</p> <p>(b) 7D, 7M</p> <p>(c) 8A, 7E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>should be ashamed of yourselves for thinking that people, who have spent a great deal of money on these vehicles because of the fact that they pay no permit fee and receive a discount for parking in Westminster, (which is there to discourage polluting vehicles), would see this as a genuine proposal to reduce emissions in the borough. It is not, and needs to be called out as such.</p> <p>(d) The result will be that I will not venture into town as often as I currently do, and this will mean that businesses in town will not benefit from trade brought in by EV drivers during the day. This proposal has the potential to destroy trade in the borough and this is something that, in the current climate, is completely undesirable.</p> <p>I strongly urge you to reconsider this proposal for EV drivers and keep the current systems of permit fees and parking charges as they are.</p>	(d) 12A
59.	<p>██████████</p> <p>Email dated 29th January 2024</p>	<p>Do not agree with the changes, nor your reasons for them.</p> <p>This is just a money-making exercise. And there is no point in registering any objections, because as always, you have already made up your minds to implement the changes/charges!!</p>	8A, 8G
60.	<p>██████</p> <p>████████████████████</p>	<p>My current residents parking permit is issued free of charge as the car is ██████████. How will that be categorized after the changes?</p>	<p>1B WSP replied to ████████ on 30th January 2024 to clarify that to determine the cost of a residents' permit would be under the proposed scheme, one would need to look up the first year of registration</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	Email dated 29 th January 2024		and CO ₂ emissions of the vehicle in question on the DVLA website at: https://vehicleenquiry.service.gov.uk/ . The relevant look-up tables of charges were provided to Mike for his vehicle type as well as a copy of the Notice of Proposals for the scheme.
61.	[REDACTED] [REDACTED] Email dated 29 th January 2024	<p>I am a local Westminster resident, and just wanted to put in an objection to the changes in resident parking charges.</p> <p>(a) An electric car takes just as much space as a petrol driven one, and electric cars already enjoy lower road tax. I do not disagree with incentives for electric and low emissions vehicles, but do not see why we should clog up our already busy streets with effectively cheaper parking for increasingly larger vehicles. In terms of parking specifically, people are paying to park, not to drive, and a parked car does not hit emissions. As I say, emissions are already covered in the ULEZ, Congestion Charge AND road tax!</p> <p>(b) If you need to have a tiered system (i.e. to raise more money or something), do it on vehicle size, with perhaps a caveat for vans.</p>	<p>(a) 7B, 7L</p> <p>(b) 7I</p>
62.	[REDACTED] [REDACTED]	<p>I would like you to consider amending the proposed changes to charges for the resident's parking permits.</p> <p>I urge you to consider the following two points:</p>	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	Email dated 29 th January 2024	<p>(a) For vehicles which register at zero emissions, how can beginning to charge be claimed to reduce emissions? Surely resident parking permits for these vehicles should be kept free. You risk people saying: 'even if I did switch to an electric car, I'd still have to pay something for my resident's parking permit. The council would be wide open to the charge of dishonest and opportunistic revenue raising.</p> <p>(b) To begin charging within a few months of the announcement is patently unfair. Families like my own which budget carefully year by year will be suddenly hit by an unexpected extra charge. Decisions like car use and budgeting require advance planning. There needs to be at least 9-12 months between making a decision on costs and their implementation. Would you as a council be happy if services you use increased their costs with so little warning? And should you treat residents worse than you would want to be treated?</p> <p>I look forward to hearing the updated proposals.</p>	<p>(a) 7A, 7D, 8A</p> <p>(b) 8E, 3A</p>
63.	<p>██████████ ████████████████████ Email dated 29th January 2024</p>	<p>(a) Aren't car drivers paying already congestion charge, ULEZ and road tax according to pollution?</p> <p>(b) A vehicle that is parked and not moving does not pollute.</p> <p>(c) It is a ridiculous way of stealing from innocent and honest people that struggle everyday to commit with the demand of a hard life.</p>	<p>(a) 7L</p> <p>(b) 7B</p> <p>(c) 3C</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		Does not make any sense at all.	
	Email dated 2 nd February 2024	(d) I do understand and accept is you wish to charge another £50 for another car resident permit but the other options are just ridiculous.	(d) 2F
	Email dated 2 nd February 2024	<p>Regarding the proposals about this matter I would like to say that,</p> <p>(a) I would agree for this</p> <p>Second permits would be charged an additional £50 on top of the price of the permit, and third permits an additional £100.</p> <p>(b) I think any others options are not based in honesty and o my to make money.</p> <p>(c) Drivers are charged already on ULEZ , road tax, parking, where pollution matters.</p> <p>(d) The emissions made from very high polluted vehicle parked is exactly the same as electric vehicle.</p> <p>For that reason is pathetic to charge more for no reason at all.</p>	<p>(a) 2F</p> <p>(b) 8A</p> <p>(c) 7L</p> <p>(d) 7B</p>
64.	<p>██████████</p> <p>████████████████████</p>	I am writing to object to the proposal for supposed emissions-based charging for resident's parking permits.	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	Email dated 29 th January 2024	<p>This does not align with a Fairer Westminster Strategy.</p> <p>(a) The crux of this is that by definition, when parking, only a tiny fraction of that time is the car emitting anything at all. When parked with the engine off, which is almost the entire time a car is parked, the car is creating zero emissions.</p> <p>(b) We already have national schemes like fuel duty which charges based upon consumption (and therefore emissions), and local schemes like ULEZ and congestion charging which deals with frequency of driving in areas where higher pollution could be an issue.</p> <p>(c) To give you an example why this personally matters to me, my car is rated as 155gm/s, so the proposal is I would pay an extra £70 a year or so. However, I rarely use my car, typically maybe 3000 miles a year, and most of those are on the motorway. I live [REDACTED] [REDACTED], which is the way I go for most journeys, so for the majority of the infrequent times I do use the car, I probably only drive about 200 yards in Westminster. Hence I drive very few miles a year in Westminster. My car [REDACTED], it spends most of the time just sitting parked (creating no emissions whatsoever).</p> <p>The scheme is flawed as someone who may drive every day, maybe covering 10,000 miles a year in</p>	<p>(a) 7B</p> <p>(b) 7L</p> <p>(c) 7C</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>Westminster, in a car with a slightly lower emissions rating than mine would pay less to park, while creating vastly more emissions in Westminster than I do!</p> <p>(d) As you can clearly see, all cars are equal in terms of zero emissions when parked for a few weeks with the engine off, there is nothing fair about the proposal!</p> <p>It should not be in the remit of local councils to penalise us for owning a certain type of vehicle while it is parked and creating no emissions. The assumption that because it has a higher Co figure it must create more emissions, as I hope I've demonstrated here, is clearly untrue, and charges for parking should not be based upon this flawed concept which takes no account of usage or mileage driven.</p>	<p>(d) 7B</p>
65.	<p>██████████ ██████████ Email dated 29th January 2024</p>	<p>I have one query about the proposed changes to charging for residents parking permits from April.</p> <p>At present I have two VRMs on a single permit, which only allows me to park one vehicle at a time in Zone B Westminster, as both are registered in my name. Under the proposed changes both vehicles will require their own individual permit with their individual VRM. Would that mean I could legally park both vehicles (registered in my name) at the same time in Zone B?</p> <p>If that is the case, I would gladly pay the extra</p>	<p>2F WSP replied to ██████████ on 1st February 2024 to confirm that the proposals, as they currently stand, would allow each eligible resident to apply for up to three residents' permits for three vehicles which could all be parked within the relevant CPZ in which they live at the same time.</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		charges.	
66.	<p>██████████ ██████████████████████ Email dated 29th January 2024</p>	<p>(a) I object to paying any resident parking permits for electric vehicles as not paying this was an incentive to buy an electric car. Otherwise, there will be no difference between buying petrol cars which defeats the entire objective and purpose of using electric cars, and to your proposed charges below.</p> <p>I don't understand why charging electric vehicles helps with reducing air pollution as it will only increase it by not buying electric cars.</p> <p>(b) Please explain why paying a resident permit for an electric vehicle helps to reduce air pollution and what pollution my electric car emits.</p>	<p>(a) 7E</p> <p>(b) 7A</p>
67.	<p>██████████ ██████████████████████ Email dated 29th January 2024</p>	<p>I am writing to object to the new pricing structure for electric vehicles to park in Westminster.</p> <p>(a) At a time when the environment is of paramount importance to the world as a whole, how does the council believe that this is justified? Through the proposed price increases to electric vehicles this will only deter electric vehicle drivers and in turn create further pollution and poor air quality.</p> <p>(b) I appreciate that the council needs to find ways to increase their income but according to the council's own statistics, under 20% of the parking sessions in the borough are made by electric</p>	<p>(a) 7D</p> <p>(b) 8A, 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>vehicles.</p> <p>Surely as a forward thinking borough, it should be incentivising the use of electric vehicles and maintain the current arrangements.</p> <p>Please reconsider this charging schedule for electric vehicles as the short-term financial benefit will only result in more long-term health issues for the people of Westminster.</p>	
68.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 29th January 2024</p>	<p>I am writing in response to the proposed changes to the parking permits received via email.</p> <p>(a) I OBJECT to the changes based on the affordability of many local people.</p> <p>(b) I have lived in Pimlico Zone A for over 30 years The introduction of the ULEZ by our Labour Major affects many local people and this is just another policy discriminating against cars in general and people who cannot afford to buy a new or compliant vehicle.</p> <p>(c) All tradespeople working in the area pass on these charges to people like myself, regardless if we own a vehicle or not, it simply increases the cost of work undertaken in our homes.</p> <p>It is a completely unnecessary change and I strongly OBJECT to the proposals.</p>	<p>(a) 3C</p> <p>(b) 11D, 3A</p> <p>(c) 3D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
69.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 29th January 2024</p>	<p>I am writing with regards to the proposed change in the concession for EVs parking in Westminster.</p> <p>I work in an office in [REDACTED] every day. I commute from [REDACTED]. I have been doing do so in my EV for the last few years.</p> <p>(a) The rationale for this proposed change – improvement of air quality – doesn't seem to stack up. My EV does not produce any emissions.</p> <p>(b) In addition, the favourable parking conditions for EVs encourages me to come into town every day. Thus benefitting the local economy.</p> <p>I would strongly urge you to reconsider this change.</p>	<p>(a) 7A</p> <p>(b) 12A</p>
70.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 29th January 2024</p>	<p>(a) I was rather baffled by the recent proposal to start charging electric vehicles - with 0 CO2 emissions to pay to park in Westminster. The reason I chose my electric car was because I wanted to help create a cleaner borough and to help reduce CO2 emissions. I am therefore baffled why my car which is 0 emissions will need to pay to park in the borough. Is this really the best way to tackle the levels of CO2 by punishing those who have made positive decisions to help address this matter and to help cut down the problem.</p> <p>(b) I think perhaps it is an easy way for Westminster to make money out of its residents - and shame on you for deciding to pick on those</p>	<p>(a) 7A</p> <p>(b) 8A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>who have already taken a positive stance to help reduce the pollution problem.</p>	
71.	<p>██████████ Resident ██████████ Email dated 29th January 2024</p>	<p>I understand you are collecting feedback on this proposed change.</p> <p>(a) I believe it makes a lot of sense to charge people more for parking and it also makes sense to have the charges being dependent on emissions. I would however, suggest two changes:</p> <p>(i) Do a steeper scale. 320 GBP for the most polluting and biggest vehicles is too cheap. Keep in mind that such vehicles cost easily 70,000 – 100,000 in the purchase, 1500 GBP per year insurance, easily 2000 – 3000 annual maintenance. Why should parking cost so little?</p> <p>(ii) Consider also the size of vehicles. A Tesla Model S may have no local emissions, but it uses a lot of space and the building of the car is not particularly friendly to the environment either. The same applies for Hybrid SUVs that really no one in Westminster needs to nothing...</p> <p>(b) To sum up, I support your proposed changes but suggest to go much steeper on large cars and such cars with high emissions. Maybe one could start with your proposed scale and add 15% every year for the next 10 years or so.</p> <p>For full disclosure, I drive a vehicle and have a parking permit...</p>	<p>(a) 2B</p> <p>(i) 2B</p> <p>(ii) 2E</p> <p>(b) 2B</p>


APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
72.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 29th January 2024</p>	<p>Thank you for your consultation email about this proposal. I have three comments/objections.</p> <p>(a) Incentives to change to electric vehicles are premature when provision for on-street charging is so inadequate. This is particularly important in Westminster where comparatively few residents will be able to park on their own properties.</p> <p>(b) Two months is insufficient notice if a resident decides to respond to the incentive and change their vehicle. Buying a new car is not straightforward and you can't always get what you want at short notice. I do not believe any new charges should be introduced before 1 July.</p> <p>(c) Although my own vehicle is a common make (██████████) and not especially old (██████████) the Govt website does not specify the emissions level. It seems wrong to automatically charge it in the highest band, when the emissions might in fact be quite low.</p>	<p>(a) 6A</p> <p>(b) 8E</p> <p>(c) 5E</p>
73.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 29th January 2024</p>	<p>(a) I am surprised to have been given such short notice of your proposed changes in principle to parking charges, and can only assume that this is because the decision to make the changes has been taken, and the “consultation” is simply for form's sake. Nevertheless, I set out my views below.</p> <p>(b) I agree that electric vehicles should be</p>	<p>(a) 8E, 8G</p> <p>(b) 2D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>charged: they do indeed cause pollution (if only because of the effect on roads of the rubber from their tyres).</p> <p>(c) I strongly object to your proposal to vary the charges according to the emission level of diesel or petrol vehicles. The reason is that it is socially divisive: many people who need a car e.g. because of frailty or inadequate public transport, cannot afford the substantial cost of changing their car, even allowing for grants. I might have expected a Conservative council to act in such a hard-hearted way, but not a Labour council.</p>	(c) 3A
74.	<p>██████████ ██████████ Email dated 29th January 2024</p>	<p>I am writing to offer my comments/queries on the proposed parking permit price restructuring for Westminster, details of which arrived in my inbox yesterday.</p> <p>(a) My comment is that if the objective is to assist in achieving net zero Westminster Council should not be applying a variable charge for parking, because parked cars have zero emissions. What the Council should do instead is work with Transport for London to set up a pay-per-mile system with a varying charge based on the amount of CO2 emitted when a vehicle is actually in use. This would discourage all private vehicle use, but especially use of older, more polluting vehicles.</p> <p>(b) My query is this: based on the existing mix of vehicles in Westminster each day, will this scheme result in more revenue than currently received from</p>	<p>(a) 7B, 7I</p> <p>(b) 1B WSP replied to ██████████ on 5th February 2024 drawing his attention to the “Financial Implications” and “Legal Implications”</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		parking, less revenue, or a broadly equal amount of revenue?	sections of the City Council's Parking Fee Structure Review (November 2023), available at https://westminster.moderngov.co.uk/ieDecisionDetails.aspx?ID=1974 , which provides information with regards to the anticipated revenue from the proposed tariff / permit changes.
	Email dated 5 th February 2024	<p>Thank you for the information in your email.</p> <p>(c) I wish now to register an objection to the scheme because it is clear from the information provided that the new structure will generate more revenue than was collected hitherto. The scheme should be revised so that it is revenue neutral. If this is done my objection will fall away.</p> <p>I also believe that the fact that the scheme will raise more revenue than is raised at present should have been stated in the email about the new charging structure. That it was not stated makes it appear that Westminster Council did not want those affected to have the complete picture.</p>	(c) 8A
75.	 Email dated 29 th January 2024	<p>The changes seem to me in my case to be totally unjustifiable.</p> <p>I only use my car on very rare occasions in London, partly because it costs me £12.50 in ULEZ charges per day when I do. I prefer to use my bicycle.</p> <p>In fact, since mid-August last year I have only used my car 11 times in London, including yesterday, and exclusively for food and other essential</p>	7C

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>shopping trips, for items I cannot carry on my bicycle.</p> <p>As a result my car has done very little mileage for nearly six months and can only have emitted minimal carbon.</p> <p>Despite this you seem to propose almost doubling what I pay for resident parking. Surely any increase in cost should be in proportion to use and mileage?</p>	
76.	<p>██████████</p> <p>██████████</p> <p>Email dated 29th January 2024</p>	<p>(a) After reading the proposition for the Tariff and Permit pricing restructure I think it's very important to think about the low income families who do have a car, however not have the same income as their neighbours.</p> <p>I think it is fair to charge those low-income families less in permits as we do live in social housing, which does not provide any free parking.</p> <p>(b) I would kindly ask you to add this to the new pricing restructure. This can be easily validated by looking at people's housing benefit allowance which information the council has in their systems.</p>	<p>(a) 3A</p> <p>(b) 7I</p>
77.	<p>██████████</p> <p>██████████</p>	<p>I object to the proposal to introduce emissions-based residents' parking charges for the following reasons:</p> <p>(a) Drivers of private vehicles with greater emissions are already penalised every single time</p>	<p>(a) 7L</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	Email dated 29 th January 2024	<p>they move their car.</p> <p>(b) The proposals are to penalise these drivers for NOT moving their car.</p> <p>(c) Those who own older, less environmental, cars tend to be economically challenged, which is why they have chosen to take the penalty each time they drive rather than purchasing a newer car.</p> <p>(d) Older people who rely on cars for mobility may be forced to get rid of their cars altogether and so lose their treasured mobility and possibly their transport to hospital and other vital services.</p> <p>(e) Because of the ULEZ charge the likelihood is that these cars are only driven when completely necessary and therefore the total annual emissions will be lower than those of more environmental cars.</p> <p>(f) There is no environmental case for forcing people to change old cars for new ones, since the majority of the emissions are caused in construction rather than use.</p> <p>(g) The newer hybrid/electric car batteries are very un-environmental and often produced using materials mined in conflict zones around the world, with associated negative social impact.</p> <p>This is a policy which, if implemented, will do far more harm than good.</p>	<p>(b) 7B</p> <p>(c) 3A</p> <p>(d) 3B</p> <p>(e) 7C</p> <p>(f) 9A</p> <p>(g) 9B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>Email dated 31st January 2024</p>	<p>I strongly object to the proposal to introduce emissions-based residents' parking charges for the following reasons:</p> <p>(h) Drivers of private vehicles with greater emissions are already penalised every single time they move their car.</p> <p>(i) The proposals are to penalise these drivers for NOT moving their car.</p> <p>(j) Those who own older, less environmental, cars tend to be economically challenged, which is why they have chosen to take the penalty each time they drive rather than purchasing a newer car.</p> <p>(k) Older people who rely on cars for mobility may be forced to get rid of their cars altogether and so lose their treasured mobility and possibly their transport to hospital and other vital services.</p> <p>(l) Because of the ULEZ charge the likelihood is that these cars are only driven when absolutely necessary and therefore the total annual emissions will be lower than those of more environmental cars.</p> <p>(m) There is no environmental case for forcing people to change old cars for new ones, since the majority of the carbon is expended in construction rather than use.</p>	<p>Please see Comments 77(a) to (g) above.</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(n) The newer hybrid/electric car batteries are very un-environmental and often produced using materials messily mined in conflict zones around the world, with negative social and environmental impact.</p> <p>Your intention is laudable, but unfortunately this is a policy which, if implemented, will do far more harm than good.</p>	
78.	<p>██████████ Resident ████████████████████ Email dated 29th January 2024</p>	<p>I write in my capacity as a long-term resident of Westminster to complain about the parking fee increases described in the above-captioned proposal. I have no argument in principle with the idea of increasing parking charges in a manner that is rationally related to good public policy. Unfortunately, the system of charges now proposed does not meet that standard.</p> <p>(a) The proposal irrationally conflates “poor air quality” with CO2 emissions.</p> <p>As a ██████████, I am both disappointed and insulted by any attempt to justify public policy that depends upon conflating “carbon emissions” with “air quality”. The contribution of automobile pollutants such as particulate matter and nitrogen oxide to respiratory disease and death have been well understood for decades.</p> <p>(b) If “air quality” means anything, it should mean the ability to breathe the surrounding air without fear that it will lead to lung failure. Poor air quality is</p>	<p>(a) 11A</p> <p>(b) 10A</p>


APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>a local problem that requires local intervention. Automobile pollutants emitted in Westminster such as particulates and NOX degrade local air quality and add significantly to the risk of pulmonary distress for Westminster residents and visitors. The marginal benefit of reducing particulate and NOX automobile emissions in Westminster is significant and measurable in public health outcomes.</p> <p>(c) By contrast, CO2 emissions defined as a problem only because they are one (of many) contributors to global climate change. Climate change is, by its nature, a global problem. The impact of CO2 emitted in Westminster is conceptually no different from CO2 emitted in the English countryside, or for that matter CO2 emitted in France, Nigeria, Brazil, Indonesia or China.</p> <p>Your Statement of Reasons purposefully conflates these two otherwise wholly independent ideas that have no bearing on one another. CO2 does not degrade air quality. It is instead one of many factors that influence global climate change. The marginal benefit of reducing some automobile CO2 emissions in Westminster upon the global climate is so small as to be invisible.</p> <p>(d) The costs imposed by the proposal are not correlated with the harmful activity it seeks to avoid and may actually encourage increased harmful activity.</p> <p>(e) A vehicle that is parked and switched off is</p>	<p>(c) 11A</p> <p>(d) 11A</p> <p>(e) 7B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>not producing any emissions. Emissions take place during time of use. Yet the proposal imposes disincentive charges measured by time of vehicle presence, not time of vehicle use.</p> <p>(f) In the case of resident parking permits, this impact of this fallacy is easy to see. The policy would assess the same higher resident's parking charge to a car that is driven 5 hours per month as it would to a vehicle that is driven 100 hours per month. The policy is therefore over broad.</p> <p>(g) In the case of kerbside parking, increasing the per-hour charge for higher emission vehicles merely creates a perverse incentive for drivers to keep such vehicles active and moving. If Westminster is serious about reducing emissions, it might instead consider decreasing kerbside per-hour charge for high emission vehicles in an effort to keep them idle longer.</p> <p>(h) The goal of discouraging use of polluting vehicles in Westminster is adequately addressed by pre-existing public policy.</p> <p>There are perfectly adequate policies in place that already address the goal of improving air quality in Westminster. The Ultra Low Emissions Zone (ULEZ) system financially penalises drivers each day they choose to operate a higher emissions vehicle in London. The Low Emission Zone (LEZ) system imposes truly eye-watering charges on those who bring heavily polluting commercial goods</p>	<p>(f) 7C</p> <p>(g) 12C</p> <p>(h) 7B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>vehicles into our city.</p> <p>And unlike the current parking fee proposal, the disincentives created by these systems are linked to patterns of vehicle use. I do not see how Westminster Council could rationally reach the conclusion that these proposed changes to parking charges will have any material marginal impact beyond those already delivered by ULEZ and LEZ.</p> <p>(i) <u>Conclusion</u></p> <p>The Statement of Reasons in the current proposal is deeply flawed.</p> <p>It fails to draw any line of causation from the proposed policy intervention of skewing parking charges by reference to CO2 emissions to the stated policy goal of improving air quality.</p> <p>It may enhance the problems it is allegedly seeking to reduce.</p> <p>The threats that it seeks to correct are already addressed (and in a more rational fashion) by pre-existing regulation.</p> <p>I therefore hope that the Council will reconsider this measure as ill-advised.</p>	<p>(i) Please see Comments 78(a) to (h) above.</p>
79.		<p>(a) I am against proposed changes since I feel that it is wrong to levy increased charges for residents who own a slightly bigger car and who</p>	<p>(a) 3C</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>████████████████████</p> <p>Email dated 29th January 2024</p>	<p>have no option to park anywhere else and are already paying a high price to park in front of their home.</p> <p>(b) Equally I don't think that people should be allowed to have more than one permit, since parking space is already limited and often difficult to find and adding more permits would make it even more difficult. There is already less space with the introduction of new initiatives, which include bays for rented bikes and scooters, covered / container type parking for privately owned bikes and the like.</p>	<p>(b) 5B</p>
80.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 29th January 2024</p>	<p>I would like to respond to the proposal to increase the Westminster parking permits according to the vehicles' carbon emission levels.</p> <p>(a) I do not disagree protecting the world greener environment but to impose such massive increase during a substantial economic downturn is insane.</p> <p>(b) To start with, the government encourages the public to use public transport, but yet, trying to cut more buses in the neighbourhood where I live and the condition of the tube station is one of the worst conditions in London, ironically, my neighbourhood is a tourist spot. It is simply embarrassing! Westminster has not done anything with TFL to improve the condition at all. On the other hand, there are limited electric car charges so who would want to buy an electric car but find it difficult to find a charging pole nearby.</p>	<p>(a) 3C</p> <p>(b) 6D, 6A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		(c) Ultimately, a slight increase is acceptable but not at such big margin.	(c) 2E
81.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 29th January 2024</p>	<p>(a) Another scheme to charge residents more for less.</p> <p>(b) Any increase in pollution is down to the changes you have made, reducing speed limits, bike lanes.</p> <p>(c) Why don't you concentrate on providing decent services and clean up the streets of the human detritus which pollute and those anti-social delivery bike drivers. Oh and crime of course you are not concerned.</p> <p>The net zero scam continues.</p>	<p>(a) 3C</p> <p>(b) 10B</p> <p>(c) 10D</p>
82.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 29th January 2024</p>	<p>(a) I am afraid that I see the proposals as just another blunt way of raising money from motorists. Whilst my car sits on the pavement it emits zero emissions, and so your proposals miss out on one fundamental point – how often is the car being driven? I need my car, but use it infrequently. I walk everywhere in Central London or use the tube. My mileage is extremely low. I am one of the good guys, but that seemingly doesn't matter.</p> <p>(b) With regards to the table, I was very surprised to see that my car was in one of the higher charging bands? I googled the emission level to discover that those from my car are considered average for the UK, so I think you have set the bar</p>	<p>(a) 8A, 7B, 7I</p> <p>(b) 5E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>very low.</p> <p>Anyway, happy revenue raising!</p>	
83.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 29th January 2024</p>	<p>(a) I am writing to you regarding the proposed parking fee structure, to come into effect from April 2024. As a lifelong Westminster resident this makes me so angry. Firstly, that it has been worked on for nearly 2 years without any input from residents. Secondly this doesn't take into account many number of flaws. Some of us have cars as a necessity. I personally, ██████████ ██████████. Buses won't even stop for me ██████████, and there isn't a single tube station close by with a lift or safe access. Day to day I walk everywhere locally- school runs and any appointment I have. My car is used more at weekends to transport my children out of London to visit their family in ██████████. There is no other viable way I could do this with ██████████ due to the numerous issues with public transport, both within London and nationally.</p> <p>(b) Already our car insurance this year has risen by £900, while car insurance companies are making bigger profits than they ever have. It's well documented that the same is happening for energy costs, and the government does nothing to assist here (bar handing out tax payers money to help with bills, that further feed the greed of these companies and their fat cat CEOs).</p> <p>(c) Is the aim here to make it absolutely</p>	<p>(a) 8C, 3B, 6D</p> <p>(b) 3E</p> <p>(c) 3C</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>impossible for us to raise a family in London!? Rising costs are pushing us all into more poverty and misery!</p> <p>(d) I also see this scheme is a way to try and force us all into electric vehicles, and meet the governments targets to phase out petrol and diesel vehicles. If just 10 people on this street bought electric cars, can you please explain to me where they will be able to charge them? If the whole road bought electric cars, could the National Grid keep up with demand? Of course not! Let's also touch on the subject of mining for the minerals needed for these electric car batteries- the atrocities in the Democratic Republic of Congo are a direct result of this. What are the government doing to stop this and assist with this humanitarian crisis and others like it? There is also the safety aspect of these cars to consider- batteries overheating and exploding, it is no secret that there is numerous safety issues here. The costs, not only for the car itself, but then the costs of replacing these expensive batteries, maintenance etc can run into tens of thousands. It's not financially viable for most residents.</p> <p>(e) It seems that none of this has been thought out at all. For me it seems this is just another money grabbing exercise, at the expense of residents who are already being squeezed financially from all angles.</p> <p>(f) I urge you to reconsider, and not only see the reality of this ludicrous increase in charges, but also</p>	<p>(d) 6A, 9B, 10F, 3F</p> <p>(e) 8A, 3E</p> <p>(f) 6D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>see that this is completely immoral when there isn't a reliable and usable public transport service for many families in the area. Until the issues I have mentioned above have been addressed, this cannot be allowed to go ahead.</p>	
	<p>Email dated 29th January 2024</p>	<p>(g) Please see below emails which highlight my issues and objections to the proposed changes to Westminster resident parking charges. These changes would have a significant effect on my family at a time when we are being squeezed financially in all directions. How much more can working class people take regarding these constant increases in charges and moving goalposts!? I hope you can take my concerns seriously and listen to the voices of residents concerned with this. I hope to get a response to this.</p> <p>(h) I drive an [REDACTED] We purchased this car as I have [REDACTED] so a normal hatchback is not suitable. This was the only petrol engine we could find that wasn't extortionate to purchase. As per the new charges, this would now cost me over £300 for a yearly permit. I do also own a small [REDACTED] (less than 1l engine), which is used mainly [REDACTED]. This is due to [REDACTED]. It also means that if a car is needed for smaller things this is more economical and environmentally friendly. I already walk most places, but these cars are very much needed, otherwise my children and I would have no way to visit their [REDACTED] at weekends.</p>	<p>(g) 3E</p> <p>(h) 3C, 3B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>Fortunately, [REDACTED] so she will be able to use that on the smaller car.</p> <p>(i) I have [REDACTED] and [REDACTED]. Local buses refuse to let me on with [REDACTED] and it becomes impossible trying to negotiate this with a [REDACTED] on the very rare occasion I can get on. My car is an absolute necessity- especially since local bus routes have been cut, meaning its even more difficult for me to use public transport. There aren't even any train stations in walking distance with a life for me to safely transport them. Also, taking into account the fact that I can barely park anywhere near my house anyway as these permits are so oversold. This charging system is extremely unfair as it targets bigger families who are struggling enough with the rise in bills, insurance etc. The encouragement of electric cars, when we don't have the infrastructure to support this, is ridiculous. Thats without even getting into the environmental impact of mining for the minerals needed, and the impact this has in countries like The Democratic Republic of Congo! I'm really unhappy and would like my voice heard on this one.</p>	<p>(i) 6D, 3E, 6A, 9A. The residents' parking scheme does not guarantee a parking space or that an available parking will be close to a resident's home address. This information is provided to permit holders in the terms and conditions when applying for a permit.</p>
84.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 29th January 2024</p>	<p>Thank you for the opportunity to comment on the Tariff and Permit Pricing Restructure Proposal.</p> <p>I have the following comments:</p> <p>(a) I do not think that it is fair to have multiple</p>	<p>(a) 3A, 7L</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>penalties for those who (often because they cannot afford a more modern vehicle) drive and park a vehicle in London. The ULEZ already covers Westminster and drivers of such vehicles already incur charges – adding additional charges for parking (whether residential permit or pay as you park) purely on the basis of emissions is likely to adversely impact those who can least afford it.</p> <p>(b) I do however, think that it is fair that all resident permits have a fee attached, irrespective of engine emissions – in Westminster a lot of infrastructure has been installed to support electric vehicles, but this is only really supporting the wealthiest who can afford these, and they are also getting the benefit of no charge for their resident's parking permit. A standard fee for a parking permit (with exemptions as already exist for certain categories of resident) irrespective of vehicle emissions seems fairest, although I would not object to oversized vehicles such as transit vans (which take up more parking space on the street) having a higher charge.</p> <p>(c) Regarding the proposal that an individual resident can apply for up to 3 permits (vs the current situation where an individual can have up to 2 vehicles on a single permit) seems counter to the intention to reduce the number of vehicles on the streets (and even reduced emissions vehicles will still increase overall emissions when multiplied in this way). It is not clear from the proposal whether all 3 vehicles will be able to be parked on the street</p>	<p>(b) 2D, 2E</p> <p>(c) 5A, 5D</p> <p>Under the proposed changes to residents' permit issuance, all three vehicles with residents' permits</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>at the same time. Currently only one of the 2 vehicles on a single permit can be parked on the street at any one time, which allows an individual/household to park different vehicles according to specific requirement at the time, without increasing the overall vehicle numbers on the street. The option to have 2 (or more) cars on the same permit, but only one parked on the street at any one time, should be retained, even if a nominal charge is made for each additional vehicle on that permit.</p> <p>Thank you for consideration of my comments.</p>	<p>could be parked on the street at the same time.</p>
85.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 29th January 2024</p>	<p>I object on this as I did it hard enough to park on Westminster and let alone the permit going up by nearly 50 percent we already have enough I urge To reject this proposal. I live on [REDACTED].</p>	3C
86.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 29th January 2024</p>	<p>I think your proposed changes are too gentle. You could - should - have a much steeper slope between the lowest and highest. The reason is that a strong signal needs to be sent that pollution MUST be reduced in urban areas. Westminster is best placed to take the lead and show an example nationally.</p> <p>I suggest that you set the bands between electric=£50 and your top band at £1000. Both numbers per annum.</p>	2B, 2D

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
87.	<p>██████████ Resident ██████████ ██████████ Email dated 29th January 2024</p>	<p>(a) I object to this projected tariff restructure on the basis that it unfairly targets the people of Westminster who can least afford it.</p> <p>Looking at the macro view, it is important to emphasise that most people don't drive older (i.e.: higher emissions) cars because they want to but because they can't afford anything better or newer. So this proposal by Westminster will unfairly impact upon the poorer residents of the borough. Those who can least afford the increase.</p> <p>(b) The micro view (my own circumstances) is that my vehicle is █████ years old, serviced annually, passes all its tests but still, █████ years old. As a single pensioner, I cannot afford to replace it, especially for the very small annual mileage I do. But as a female who lives alone, I cannot do without it. Consequently, if I have to spend more money on my annual parking permit and pay-to-park outings, then I will be spending less in other parts of the borough: purchases in local shops, businesses and entertainment will be reduced for budget reasons. A lose-lose situation.</p> <p>(c) However, I don't suppose anyone has considered the 'robbing Peter to pay Paul' aspect of the increase? People's budgets are finite, especially in the current cost of living crisis, so something else will have to 'give' to accommodate pricier parking. Nobody wins.</p>	<p>(a) 3A</p> <p>(b) 3B</p> <p>(c) 3E</p>
88.	██████████	I would like to express that I am very much against	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>████████████████████</p> <p>Email dated 30th January 2024</p>	<p>Westminster Council's proposal to start charging electric cars for resident parking and to eliminate the 10 minute cap on pay and display parking.</p> <p>(a) I don't understand how you can claim to be incentivising motorists to switch to electric when you propose removing two of the key benefits?</p> <p>(b) With electricity prices the way they are, charging my car's battery on a lamp post charging point cost me as much as filling up my old petrol engine.</p> <p>So parking savings were the main economic benefit of switching.</p> <p>(c) I didn't expect a Labour council to punish residents who are trying to be more green. And now can you justify pushing the change through so quickly? Thousands of residents would have very recently purchased or leased and electric car. Even the introduction of ULEZ gave motorists more notice to switch.</p>	<p>(a) 7D</p> <p>(b) 6C</p> <p>(c) 7D, 8E</p>
89.	<p>████████████████████</p> <p>████████████████████</p> <p>████████████████████</p> <p>Email dated 30th January 2024</p>	<p>I write on behalf of my company ██████████ which operates in Westminster from premises at ██████████ as well as other locations in central London, to condemn the change to parking.</p> <p>(a) I was sad to learn that Westminster is proposing at short notice to change its parking charges. When we buy fleet cars we do so for a</p>	<p>(a) 8E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>period of years not weeks, to change a much heralded policy with so little notice is unfair and wrong. Further it is unclear as to what the costs will be which is unacceptable. What company would be allowed to tell its clients you are moving costs at little notice to a level that is unclear?</p> <p>(b) If you need money charge the cars already acknowledged as polluters not those bought in good faith. We therefore would ask you to review your policy and look to support those that have followed policy rather than penalise them.</p>	<p>The proposed charges are set out in the Notice of Proposals which was published on the City Council's Parking web site and on the City Council's Traffic Order web site.</p> <p>(b) 8A, 7E</p>
90.	<p>██████████ ██ Email dated 30th January 2024</p>	<p>I am writing in regard to the proposed changes to the parking rules in Westminster.</p> <p>(a) Whilst I agree completely with the changes to charge cars based on their level of carbon dioxide emissions, I do not understand the thinking behind punishing EVs and making it impossible for EV drivers to continue to benefit from the existing rules.</p> <p>You say that the aim is to encourage the use of low-polluting vehicles but you are creating another reason against purchasing and using EVs by removing the 10 minutes every 4 hours structure.</p> <p>(b) By all means raise the prices a little but by completely reversing the above 10 min rule, you are making it impossible for me (and I imagine other EV drivers) from being able to drive into Westminster.</p>	<p>(a) 2C, 7A, 7D</p> <p>(b) 3D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		Please can you re-consider this proposal and continue to help drivers of EVs.	
91.	<p>██████████ ██████████████████████ Email dated 29th January 2024</p>	I believe the increase in resident permits is unfair on households that are already experiencing difficulties due to the cost of living crisis. I understand the need to reduce emissions however I believe emissions are not necessarily from residents but from other sources as well (i.e., tourism). As such, I feel strongly about punishing the residents in the area. I strongly encourage the council to reconsider this and keep the original pricing.	3E, 11B
92.	<p>██████████ ██████████████████████ Email dated 30th January 2024</p>	<p>You invite comment on your emissions proposals for resident parking in Westminster.</p> <p>May I suggest that you also consider the size of the vehicle? For instance, the dimensions of a Range Rover are 1.635 times greater than a Fiat 500. Take the Fiat 500 as the base size of a vehicle in Westminster and for a Range Rover multiply the parking charge by 1.65? A Rolls Royce's dimension is 1.95 times the Fiat's. Manufacturers publish car dimensions, thus it is a simple calculation. End result, large cars will not only pay according to emissions but also size. It is simple to change the factors on an annual basis.</p>	7I
93.	<p>██████████ Resident ██████████████████████</p>	In relation to the proposed emission based charging scheme the Westminster Council are failing to recognise the elephant in the room despite it being a continuous problem reported to the Police	<p>11B.</p> <p>As noted by ██████████ the City Council and the Metropolitan Police have limited options where the</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>Email dated 30th January 2024</p>	<p>and Westminster noise team over a number of years but, neither party have the jurisdiction to deal with the problem. New legislation will be required to tackle the overseas visitors super cars to reduce the air pollution in Westminster.</p> <p>Central London - Mayfair, Knightsbridge and Piccadilly specifically, are impacted by the air and noise pollution from the many super cars which the overseas visitors bring with them for their stay. They use Central London as a race track in the early hours of the morning, the engines are designed to back fire, emitting considerable pollution into the atmosphere and keeping residents of Westminster up all night. The engines are so loud the vibration causes the windows in my apartment to rattle.</p> <p>This problem which has been going on for years falls between both the Police and the Westminster noise teams' jurisdiction.</p> <p>The noise team say the problem is a police matter because it falls under the road traffic act but the police say they do not have the jurisdiction to confiscate the polluting car but can only treat it as anti social behaviour and move it on, which does not resolve the problem of the back firing engine and the emissions impacting on air quality, moving it on just causes problems for someone else.</p> <p>When the working man/woman is charged ULEZ to enter central London why are the super rich visitors</p>	<p>parking charges for high emission vehicles and the fines for exceeding the maximum legal noise level for a car's exhaust are not a deterrent to certain drivers, and relevant highways legislation can only be applied in specific circumstances. The current noise limit for vehicles is 72dB, which is expected to further reduce to around 68dB by 2026.</p> <p>In the interim, it would be necessary for the national government to apply further noise curbs on vehicles at the manufacturing / import stage or to give the police / local authorities additional powers to address anti-social vehicle noise.</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>allowed to bring in their super cars and pollute the city and cause significant disturbance with no penalty.</p> <p>Acoustic cameras have been proposed but the perpetrators say.... <i>“No problem I can afford the fines”</i>. When money is no object then confiscation or a ban on highly polluting super cars is the only solution.</p> <p>This car from [REDACTED] caused us considerable problems during the summer of 2023 and there are many more. The owner of the car (a visitor from [REDACTED] for the summer months) was not concerned about the disturbance he was causing or the impact his car was having on the air quality.</p> <p>See items 3 and 4 in Appendix B</p>	
94.	<p>[REDACTED] [REDACTED] Email dated 30th January 2024</p>	<p>(a) I'd like to raise strong objections to the new proposals as part of this TMO. The council states that "The City of Westminster has some of the highest carbon emissions and worst air quality of any national local authority." and then they go on to remove incentives for people to move over to electric cars - this makes absolutely no sense whatsoever. We are [REDACTED] and as much as we try to walk, use public transport where we can, it is just not always possible with [REDACTED] - we bought an electric car, despite the higher upfront cost, partly driven by the benefits we get as a Westminster Resident - no permit and lower parking charges. Of course</p>	(a) 7D, 7E

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>longer term these will have to be changed, but to make the change now, when EV sales are not growing as much as they should do, when inflation is driving up costs across the board, the government appears to be rowing back on some of its green pledges, it feels very disappointing the labour council, rather than taking a positive and forward looking stance to continue to encourage EV takeup, is now removing the incentives that can make such a difference. Currently under 10% of Westminster vehicles are EV vehicles and this number must be driven higher.</p> <p>(b) Unfortunately in London you cannot get the main advantage of the lower running costs as charging at public points can be in some cases up to 10x more than at home charging (for example Source charge 65p kwh whereas Octopus offer an EV rate of 7p/kwh) and according to the council this impacts about 5% of vehicles, so surely the financial increase is not that significant, and yet the message it sends out to everyone is extremely negative. The congestion charge is currently free for EV until the end of 2025 and it makes sense for the council to at least align with this. So while in principle the idea of emission based parking makes sense, EV vehicles must be incentivised to encourage higher uptake.</p>	<p>(b) 6C, 7D, 5F</p>
	<p>Email dated 5th February 2024</p>	<p>(c) I'd also like to raise a secondary objection to this TMO as I do not believe that the summary and description is valid in what it says. The description which gives details about the TMO are available</p>	<p>(c) The summary text on the City Council's Traffic Orders web site is intended only to direct the visitor to the web site to the Notice of Proposals. The wording on the relevant web page was updated on</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>here. However, the information on this proposal is very misleading and does not include some of the key facts about the TMO - only by going in to the full details of the TMO are residents actually able to see the full effects that these will have, and how the emissions based charging does not actually incentive the cleanest vehicles compared to today.</p> <p>(d) "We propose to introduce emissions-based charging for both pay-to-park casual kerbside parking and residents' parking permits to incentivise cleaner less polluting vehicles."</p> <p>However, the charges will give a disproportionate increase to the cleanest vehicles. For example, parking charges for 4 hours for electric vehicles will increase 17x from their current rates but the diesel cars are increase only 1.5x. I appreciate this is starting from a low base, the literature asking from comments on this should be much clearer for people to make informed decisions and objections though.</p> <p>(e) Also, for the vast majority of cases, the parking increase is rising at around 25% (taking into consideration that the average car in the UK has an emissions in the 91-150 bracket) - this is not shown in the literature or summarised anywhere in the proposal. It is not clear that an increase is required by the council in their budgets, nor any justification given to the vast increases across the board for all vehicles. Bearing in mind requirements around what parking revenue can be used for, and</p>	<p>29th January 2024 to make it clear how people could object or comment on the proposals and that the link at the bottom of the page was for the Notice of Proposals and Statement of Reasons., 7D</p> <p>(d) 3D</p> <p>(e) 8A, 11A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>the restrictions it does not seem to give justification anywhere for these increases. In the Parking Fee Structure Review – Approval of Detail of the 6th November it talks about savings of £3.2 million but are these savings actually just extra revenue - if this is the case then should it not be clearly labelled as extra revenue and not savings. With the potential extra savings detailed in 8.2/3 of the document it is an increase of revenue of almost 6.5% - this is a large increase and well above current levels of inflation - is there any justification on this sort of increase in the proposed spending? I am unable to see a budget that shows the impact or need for this major increase. It also suggests that the existing budgets already takes into account some of these changes in fee structure and as such the additional revenue from these fee changes is not actually needed for their proposed budgets - if they do not need the revenue, surely the proposed fee structure changes, but not changing of the fees is enough in itself as these significantly incentive the least polluting vehicles, and there is no assumptions anywhere that these increases will reduce the number of vehicles on the road.</p> <p>(f) In the review they also state that it is OK to use charging to suppress vehicle usage, and to encourage less polluting vehicles - in this new scheme they are actually taking away significant incentives for the cleanest vehicles as before the incentive was around a 95% reduction in parking costs, and now the discount of an EV is only 12.5% on the next level up, this is actually removing</p>	<p>(f) 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>incentives for the cleanest vehicles, and making any savings of having the cleanest vehicles much less than it currently is.</p> <p>(g) Therefore, as well as objecting to this TMO on my original grounds I also object to it on the following:</p> <ul style="list-style-type: none"> • The literature accompanying it is not sufficiently clear or provides all the information to allow people to make an informed decision - does not give clear indication on the fee increases, the amount of increase for average residents parking, does not give clear indication on the extra revenue raised and how this is justified on current spending levels • While appearing to propose charging on different emissions levels (which I support), it seems to actually hide a major increase in parking charges (which I don't support) • It is not 100% clear in the existing documentation that the proposed fee increases are required for the council's budget and as such do not seem to justify the increase in revenue at this time. 	<p>(g) The City Council is satisfied that the Notice of Proposals and Statement of Reasons were accessible and signposted on both the City Council's Parking web site as well as its Traffic Orders web site. The Notice of Proposals sets out the proposed changes for each permit holder and visitor but does not, by its nature, set out the detailed background, context or implications of the proposals. The City Council's Statement of Reasons provides a brief overview of the purpose of the proposals and directs readers to the City Council's Cabinet Member Reports on these proposed changes. These reports provide more detail on the need and expected outcomes of the proposals. 8A</p>
95.	<p>██████████ Resident</p> <p>████████████████████</p> <p>Email dated 30th January 2024</p>	<p>I wish to object to the proposals for discriminatory charging on resident parking based on emissions. The problem with the proposal is the fact base that is used to propose this. This is your opening statement:</p> <p>'The City of Westminster has some of the highest carbon emissions and worst air quality of any</p>	7B, 7I

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>national authority.'</p> <p>The above phrase may be correct but it does not follow that the main cause is the residents. I drive a [REDACTED] which would fall into your top category. However, I don't drive it Monday-Friday, as I take public transport. Therefore it mainly gets used at weekend, if at all. So from a fact based point of view, I can't be a major polluter. Also, looking at all the other cars in the area around me they are similarly used very infrequently.</p> <p>So the problem is the Amazon vans, tradesmen and most of all the lorries of major developers doing building work, not the residents. In summary, you don't have a case for penalising residents, but I'm sure you know that already.</p>	
96.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 30th January 2024</p>	<p>(7a) For me, an important consideration is being ignored in the new 1A/1B banding structure; that being the dimensions of the vehicle, which directly relates to parking (rather than just emissions). It is reminiscent of the original congestion charging which exempted eco vehicles despite that having nothing to do with solving congestion.</p> <p>(b) It is a pity that the breakdown of number of vehicles between 1A and 1B was not shown in the documents as this would have given a clue as to the proportion of people investing in small eco cars (which is what the city needs).</p>	<p>(a) 71</p> <p>(b) It is noted that the City Council's Parking Fee Structure Review (November 2023) states that: "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." https://westminster.moderngov.co.uk/ieDecisionDeta</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(c) Having previously allowed 'eco' vehicles to pay zero for resident permits, and having discounts for pay-to-park, you have not discouraged the purchase of ever larger EV vehicle types, in particular SUVs. Some of these are 5m+ long and approaching 2m wide, which means they overlap parking bays, and in some of our resident bays, you can only fit 3 vehicles at best rather than 4 smaller ones.</p> <p>So I feel that the new 1 bands should have something to discourage this general creep of ever larger vehicles on our streets (or at least charge for them). Here at [REDACTED] there is double parking of resident bays down one-way streets and it is getting to the point where SUV 'overhang' makes it virtually impossible to get into some spaces and blocks delivery vans etc passing.</p> <p>Basically don't base it on battery power; a Tesla model 3 comes with three different options 54kWh (standard range), 62 kWh (standard plus), 75kWh (long) - same car but you will charge differently depending on the option! It makes no sense. The consideration should relate to vehicle size.</p>	<p>ils.aspx?ID=1974. This information may be available after the first year of operation, should the proposals be implemented, as then all permit holders would have either renewed under the new structure or switched to alternative forms of transport.</p> <p>(c) 71</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
97.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 30th January 2024</p>	<p>I consider this measure to be incorrectly designed.</p> <p>Larger cars (for instance SUV's) which are owned by residents are used far less (and thus emit less CO2) than many cars that are driving around the centre which are smaller and used for short trips. Generally SUV's are used for larger loads/quantities of people and used at weekends.</p> <p>Why not charge by a combination of emissions and annual mileage in the City of Westminster?</p>	7I
98.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 30th January 2024</p>	<p>(a) While I fully support efforts to address pollution, and I acknowledge that large schemes may not satisfy everyone, I wish to highlight a significant flaw in the proposed initiative. This concern should be addressed without imposing any additional costs on the Council and ensuring fairness to residents:</p> <p>(b) The proposed additional levy on diesel vehicles registered pre-2015 is aligned with the implementation of the Euro 6 norm to combat harmful emissions, specifically NOx. However, the selection criterion based on the date of registration, rather than the Euro 6 compliance of the vehicle, discriminates against environmentally conscious owners. Many of them proactively purchased compliant vehicles ahead of the Euro 6 norm, often forgoing discounts available for Euro 5 cars and paying a premium for being environmentally aware.</p> <p>Euro 6 compliance data is readily available on the</p>	<p>(a) 2C/2B</p> <p>(b) 7E, 7I, 11A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>V5 document and databases. It's worth noting that the wider London authority has already adopted a similar scheme for the congestion charge, which considers a vehicle's compliance with the Euro 6 requirement rather than its age. There is no reason why the Council shouldn't adopt the same evidence-based and fair approach.</p> <p>I am writing to express my opposition to the introduction of this particular aspect of the proposed scheme, solely based on the registration date of the vehicle. This criterion unjustly discriminates without any scientific or factual basis.</p> <p>If implementing a change to consider the actual Euro 6 compliance of the vehicle proves cumbersome, I suggest that the Council, at the very least, provides residents with the opportunity to provide evidence of Euro 6 compliance for their vehicles registered pre-2015. These vehicles could then be whitelisted going forward. This approach would ensure fairness among residents while still applying differentiated taxation based on a demonstrable and scientific assessment of the pollution levels of different vehicles.</p>	
99.	<p>██████████ ██████████ ██████████</p> <p>Email dated 30th January 2024</p>	<p>(a) We are a local business with around 8 cars. We are renting spaces locally for £100 (approx) per month for the petrol cars in our fleet. We recently changed 2 cars to electric which is much better for the environment despite the significant purchase costs but these were partially offset with the discounted pay and display charging amongst other</p>	<p>(a) 7E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>things.</p> <p>This new plan to increase pay and display parking charges will not only be harmful to the environment but also to local businesses and residents and as such is completely counter productive. We will definitely not be changing the rest of the fleet to electric if this proposal goes ahead.</p> <p>We sincerely hope this ridiculous proposal is shelved.</p> <p>(b) It was also quite disappointing that we, as a local business that has been operating from the same location in Westminster for over [REDACTED] years, were not informed about this consultation and if it were not for an article in today's Times then I would not have heard about it.</p>	<p>(b) 8D</p>
100.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 30th January</p>	<p>I strongly object to the scale of price increase proposed for resident' parking permits.</p> <p>(a) Your proposal represents an excessive doubling of the charge for my car compared with 2023.</p> <p>(b) Whilst I agree with the aim to reduce carbon emissions, I would point out that I and many Central London car owners do not use their cars within Central London as driving is just not efficient compared to public transport. The majority of vehicles driving within Westminster are not residents.</p>	<p>(a) 3C</p> <p>(b) 2B, 11B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		(c) Like many residents I only use my car when leaving London, and if I did choose to drive in London, I would use my wife's compact all electric car which obviously has zero emissions.	(c) 7G
101.	<p>██████████</p> <p>██</p> <p>Email dated 30th January 2024</p>	<p>Concerning the new proposed residents' parking permits with effect 1.4.24, I have looked at the list of charging bands you have emailed out and am not absolutely clear which band my car would be placed in.</p> <p>Please could you kindly confirm whether I am in Band 4 or Band 5? My car was made in ██████████, CO2 emissions are 148 g/km; cc is 1390.</p>	<p>1B, WSP replied to ██████████ on 30th January 2024 requesting clarification as to what type of fuel her vehicle uses or whether it is a hybrid or fully electric vehicle, etc?</p> <p>If the vehicle is a hybrid, she was asked to confirm whether it is hybrid petrol or diesel (the latter is quite rare). WSP advised that they should then be able to advise her of the correct band and charge that would apply if the proposals are implemented.</p>
	<p>Email dated 30th January 2024</p>	<p>Thank you for your response.</p> <p>The car is a bog standard petrol using car. Not hybrid or electric. The reg is ██████████ in case this helps. I am just concerned about how much I am likely to have to pay for a residents' parking permit after 1.4.24. and to understand the new proposed charging structure.</p>	<p>WSP replied to ██████████ on 30th January 2024: Based on the information you have provided, I believe you would fall into Band 4 for petrol vehicles which is £139.10 per year.</p> <p>Please note that if a resident owns multiple vehicles then each vehicle after the first vehicle that needs a residents' permit would be subject to an additional charge (+£50 on top of the residents' permit charge for the second registered vehicle and +£100 on top of the residents' permit charge for the third registered vehicle).</p>
102.	<p>██████████</p> <p>██</p>	<p>With regards to your consultation on the changes to traffic orders (reference: 8056/PJ), I would like to state my objection to these changes as I am a regular visitor to Westminster where my offices are</p>	12D

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>Email dated 30th January 2024</p>	<p>and I have been using a fully electric car since 2011 to ensure my carbon footprint is at its minimum. We did specifically pick offices in [REDACTED] as they enabled us to commute in and out with our electric cars easily and have the ability to park the cars at much higher discounted rates.</p> <p>With the above, I believe that charging visitors (or people with offices) that are using fully electric cars a full (despite slightly reduced) parking fee in Westminster area will actually have the opposite effect to your desired outcome to reduce emissions, as anyone with an electric car would elect to use taxis, Uber, or other type of private hires that will become cheaper than paying for a parking meter, which in effect will increase the number of none electric cars going in and out of Westminster and constantly moving around to get customers rather than idle cars.</p> <p>With that, I would like to (1) register my objection, and (2) propose that for fully electric cars the 10 minutes fee continue to apply if you are unable to provide that to hybrid cars.</p>	
103.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 30th January 2024</p>	<p>This is my feedback regarding this public consultation.</p> <p>I am not a Westminster resident but I do frequently visit the borough for work, leisure and shopping etc., so am mainly concerned with pay-to-park changes.</p>	


APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>I drive a zero emissions vehicle.</p> <p>(a) I appreciate the emissions-banded pay structure as a fair approach, however the charges proposed do still represent a significant increase on the current cost even for my vehicle. This inevitably disincentivise me from visiting the borough (and hence giving the local businesses my custom) and I will be highly likely to look for alternative destinations for any non-essential visits/trips.</p> <p>(b) I feel more consideration should be given to drivers of zero/ very low emission vehicles so that the change in cost from the current scheme is less significant. This would also more effectively incentivise people to buy and use lower emission vehicles.</p> <p>Thank you for reading this and considering my input.</p>	<p>(a) 2C, 3D, 12A</p> <p>(b) 2C, 7D</p>
104.	<p>██████████ ████████████████████ Email dated 30th January 2024</p>	<p>(a) I hope this message finds you well. I appreciate the comprehensive information provided in your recent email regarding the proposed changes to resident permits and emissions-based charging. However, I would like to highlight the absence of explicit details on how residents and stakeholders can actively provide their feedback on these proposed changes. The links provided below also show no detail on this matter and I can confirm I have searched through the link but no contact address is provided.</p>	<p>(a) 8D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>To ensure a transparent and inclusive decision-making process, it would be beneficial to clearly outline the avenues through which individuals can share their opinions and ask questions regarding the proposed alterations. Including information on the specific channels or platforms designated for the Traffic Order consultation, as well as any additional means for feedback submission, would greatly enhance the accessibility and participation of residents in expressing their views.</p> <p>I understand the importance of engaging the community in decisions that directly impact them, and I trust that you will consider incorporating this crucial information into your communications. I urge you to release new communications with explicit details on how residents and stakeholders can provide their feedback on the proposals. Please do so within 48 hours and consider extending the consultation period.</p> <p>Thank you for your attention to this matter. I will provide my feedback on this matter separately in another email.</p>	
	Email dated 30 th January 2024	(b) I have carefully reviewed the information provided in your recent communication regarding the proposed changes to resident permits and emissions-based charging. While I acknowledge the City of Westminster's commitment to reducing air pollution and promoting cleaner vehicles, I must express my strong disapproval of the proposed	(b) 2B

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>charging structure.</p> <p>(c) The new payment structure, based on CO2 emissions, appears to disproportionately burden residents, particularly those with lower incomes. The introduction of charges, even for electric vehicles, may be perceived as an additional financial strain on individuals who may already be struggling with the high cost of living in Westminster. The swift implementation of these changes without sufficient time for residents to adjust raises concerns about the affordability and accessibility of cleaner vehicles.</p> <p>(d) Furthermore, the incremental surcharge for additional permits creates an additional financial hurdle for residents with multiple vehicles, potentially impacting families or those with specific transport needs.</p> <p>It is important to consider the economic realities faced by residents, especially when proposing changes that may influence their daily lives. I urge the City of Westminster to reassess the proposed charging structure with a focus on minimizing the financial burden on residents and ensuring a fair transition to cleaner transportation.</p> <p>Thank you for considering these concerns.</p>	<p>(c) 3A, 3E, 8E</p> <p>(d) 5D</p>
105.		<p>Grounds for Objection: Loss of Business</p> <p>We operate a number of retail premises in the</p>	12A

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 30th January 2024</p>	<p>Westminster area and despite the difficult trading conditions over the past few years especially over the Covid/Strikes periods the only positive uplift we have seen was from customers visiting central London by vehicle due to the subsidy for electric cars.</p> <p>I fear the council's new policy will only increase the number of vehicles (mostly large and polluting) that are paid for by building contractors who can afford the higher daily charges rather than the retail customers we so desperately need.</p>	
106.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 30th January 2024</p>	<p>I would like to comment on this proposed new pricing restructure.</p> <p>(a) This is being branded as an environmental policy, aimed at reducing emissions, but is quite clearly focused on increasing parking revenues. It relies on non car-owner support and ignores how desperate things currently are for existing EV owners and how the EV market is currently in a very precarious position.</p> <p>(b) I have owned an EV since 2021 and live in Westminster ([REDACTED]), but like so many other people I know (or have read about) I am seriously thinking about moving back to petrol. My reasons are as follows:</p> <p>(i) My insurance has more than trebled in the last 18 months, with quotes for new policies starting at £2,000/year (up from £550).</p>	<p>(a) 8A, 11D, 7A</p> <p>(b)</p> <p>(i) 3E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(ii) Energy price increases have provided public charger operators an excuse to more than double charge rates (most of which are in excess of 70p/kWh). It is now more expensive to drive an EV (per mile) than a petrol or diesel car. We desperately need regulation to control price inflation (and operator profits).</p> <p>(iii) There are far too few public chargers. Do Government understand how small the ratio of cars-to-chargers needs to be in order to meet national environmental targets, especially if cars charge at an average speed of 7kW/hr or less?</p> <p>(iv) Public chargers are often inaccessible, either due to inconsiderate parking/users, or maintenance issues.</p> <p>(v) EV subsidies are being withdrawn too early. (E.g. Subsidies on home charger installations, discounts on car road tax, BIC rates, TFL clean air discount).</p> <p>(vi) The second-hand car market for EVs has collapsed. Not only have owners had to pay 25% more for their electric cars, they have also had to endure massive depreciation costs (as much as 50% in the first year)!</p> <p>(vii) London is an exceptionally expensive place to live. Westminster can't keep using punitive financial penalties to force people to change their vehicles or</p>	<p>(ii) 6C</p> <p>(iii) 6A</p> <p>(iv) 6A</p> <p>(v) 5F</p> <p>(vi) 7D</p> <p>(vii) 3E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>habits. They really need to use less stick and more carrot.</p>	
107.	<p>██████████ Resident ██████████ ██ Email dated 30th January 2024</p>	<p>I would like to contribute to the public consultation on changes to parking charges for residents.</p> <p>(a) I would like to register my strong disapproval of the changes you are proposing to implement. A charge of up to £300 for parking on one's own street is frankly disgraceful, when the cost of living is rising so much, and pay is not keeping up with inflation.</p> <p>Residents already face very high council tax charges in return for very poor public services, and this is yet another tax on working people who contribute to society.</p> <p>(b) In my case, you are proposing a thirty per cent increase to parking charges, despite the fact that my vehicle is ULEZ compliant. This is punitive and deeply unfair.</p> <p>(c) Your contempt for the difficult financial situation residents are facing in this financial climate is evident. A charge of 26% above inflation is frankly preposterous.</p> <p>Please take note of my objection. This charge will be reflected in my vote in at the next opportunity.</p> <p>A council that does not support residents in straitened circumstances during a cost of living</p>	<p>(a) 3C, 3E, 10D</p> <p>(b) 3D</p> <p>(c) 3C</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		crisis must be deeply out of touch, and should be replaced.	
108.	<p>██████████ ██████████ ██████████</p> <p>Email dated 30th January 2024</p>	<p>I am writing as a long time resident of Westminster. I greatly oppose these new parking charges both for residents permits and pay to park. We were encouraged to go clean and swap to electric vehicles, but as soon as we do that you penalise us in all directions. You do not take into account the residents cost of living, and we feel duped into making changes but yet again suffering negatively. The greed of all the councils is unbelievable, with a new scheme to make money coming out all the time. I am sure you will not take into consideration our opinions and will make the changes anyway, but have to do these consultations as a matter of course.</p>	7E, 3E, 8A, 8G
109.	<p>██████████ ██████████</p> <p>Email dated 30th January 2024</p>	<p>I have received an email with the proposed changes in charging to the vehicles permits for Westminster and I would like to express my dissatisfaction with the proposal.</p> <p>(a) Firstly due to the charge to electric vehicles, a lot of car owners made a move to a greener vehicle motivated by the advantages that this had from a cost perspective. Including them in the system by making them pay would send the wrong message about the commitment of this government towards cleaner air. It will also mine the trust of drivers in the promises that are made to them and feels like the wrong thing to do.</p>	(a) 7E

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(b) Secondly, the charges for the most polluting vehicles seem a little high, I own a second hand car that is big, from 2016, and I rarely drive it, it is something we only use to get out of the city and it mostly is parked near the house. I am aware that most of the residents in central London have this same situation, the congestion charge is more than enough to discourage us from driving in the city, now we cannot even park our cars in the city. I appreciate there are a lot of very rich people in central London, with a multitude of very polluting cars and that maybe should contribute more, but this measure will punish the middle class with slightly older cars.</p> <p>(c) Changing cars is in itself an expensive ordeal and wasteful in natural resources, so it also doesn't make a lot of sense to force this move on us, when food and energy bills are sky high and rents are being raised uncontrolled by greedy landlords. It simply brings more pain to an already stretched population.</p> <p>I hope this helps in any way.</p>	<p>(b) 3C, 3D, 7C, 7L</p> <p>(c) 9A, 3E</p>
110.	<p>██████████ Resident</p> <p>████████████████████</p> <p>Email dated 30th January 2024</p>	<p>I am a long term resident of Westminster who uses the residents' parking scheme which you provide. I recently received an email from you to say that in order to improve the air quality of the borough you intended to alter the parking pricing structure. We were encouraged to submit comments on these changes. My comments on these changes are as follows.</p>	<p>WSP replied to ██████████ on 5th February 2024 in respect of item 110(b) below:</p>



APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(a) The changes appear to be primarily driven by the desire to raise revenue rather than the desire to improve air quality.</p> <p>(b) No statistical or scientific basis is offered to support the claim that an increase in parking charges will lead to better air quality. Has the council done such an analysis? What were the results? Can these be published? What proportion of emissions are caused by residents vehicles as opposed to vehicles which transit the borough. This is the sort of policy fiat which one expects from Sadiq Khan not Westminster City Council.</p> <p>(c) Local residents often rely on traders from outside the borough. This measure will make this more difficult- complicating the lives of those you purport to serve.</p> <p>(d) What is your mandate for these changes? At the last local election which political party explicitly stated that they were in favour of increased parking charges for residents? Have you conducted any survey of residents to discover whether such a change commands majority support?</p>	<p>(a) 8A</p> <p>(b) 11A, Whilst we have not commissioned or carried out any specific analysis in this regard, it stands to reason that an increase in the ownership and use of lower band, less polluting vehicles at the expense of those in the higher, more polluting bands can inevitably only have a positive impact on air quality. From our own experience with our pay-to-park diesel surcharge scheme which came into effect in 2017, this has quite significantly reduced the proportion of pre-2015 diesel vehicles paying to park in Westminster.</p> <p>For practical reasons we are unable to ascertain the proportion of emissions caused by residents as opposed to those visiting or travelling through the borough.</p> <p>(c) 12A</p> <p>(d) 8H</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		I look forward to hearing your response to these points.	
	Email dated 5 th February 2024	<p>(e) Thank you for your email. The response from the City Council is clearly inadequate. By its own admission no analysis has been done on the likely impact on emissions of this price hike in parking nor has there been any study on the balance of emissions from transiting traffic as opposed to residential traffic. The price increase is based on an unsupported assumption - "it stands to reason that" - and a study on a specific type of vehicle (diesel) which is now 6-7 years out of date. One can only assume that it is a revenue raising exercise masquerading as a green measure.</p> <p>(f) I also note that the issue of whether the City Council has a mandate to impose this increase has been ignored.</p>	<p>(e) 11A, 8A</p> <p>(f) 8H</p>
111.	<p>██████████ Resident</p> <p>██████████</p> <p>Email dated 30th January 2024</p>	<p>Thank you for the documentation you sent regarding the new charges for Parking Permits.</p> <p>(a) It seems to me that the increase in charges which are excessive, 28.9% in my case, from 166.00 (2023) to 214.00 according to your chart for 2024, for CO2 emissions, are just an excuse for you, the Council, to yet put on another tax on law abiding citizens including senior citizens so that you can support all the inhabitants in Westminster who do not pay taxes and, btw, who will not be able to vote for you, in the forthcoming elections.</p>	<p>(a) 3C, 8A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(b) Moreover, it is unfair to those citizens living in Westminster who already own a car and do not have elsewhere to park it but, in the street, for you to be penalising us for already owning a car way before the issue with CO2 emissions even started!</p> <p>Please also consider the following:</p> <p>(c) Cars parked do not produce CO2 emissions. You should not tax cars that are parked or using a permit space. We already pay more Car Taxes.</p> <p>(d) Senior citizens need a car and often rely on their pensions for financial support. This will be yet again another burden on their budget.</p> <p>(e) What about young families with large mortgages and expenses for their children. They will also have to pay extra for parking which is a necessity for them with young children. Public transport is not an option because it will only make their lives harder.</p> <p>I hope you will be reconsidering your proposal for such unreasonable charges and to hearing from you soon.</p>	<p>(b) 8C</p> <p>(c) 7B, 7L</p> <p>(d) 3A</p> <p>(e) 3B, 6D</p>
112.		<p>I am a resident of Westminster for the last  years</p> <p>(a) I am outraged by this proposal – it is just another money making exercise for Westminster and will make no impact whatsoever on emissions,</p>	<p>(a) 8A, 10A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>██████████</p> <p>Email dated 30th January 2024</p>	<p>especially when China and India et al keep churning out more and more coal fired power stations.</p> <p>(b) Better if Westminster spent more time keeping cyclists and scooters off pavements and going through red lights. As a pedestrian it is becoming a nightmare just walking around.</p> <p>The congestion and air quality in the area that I live has significantly become worse since introduction of various cycle lanes and other “traffic calming” measures, but made much worse still by the continued closure of the North and South Carriageways in Hyde Park (for no apparently reason) and the continuation of the cycle lane on Park Lane</p> <p>Your sense of priorities is profoundly lacking</p> <p>I object to this proposal</p>	<p>(b) 10B, 10E</p>
113.	<p>██████████</p> <p>██████████</p> <p>Email dated 30th January 2024</p>	<p>(a) I have a small electric car. This is promoted by you as the eco responsible vehicle for central London. I have already paid a premium of approximately 30% to buy this car. Charging for parking these cars is a disincentive for people to buy them and will only encourage greater pollution by petrol and diesel powered cars.</p> <p>(b) 5. If you installed far more high speed chargers in the Borough more electric vehicles would be bought and your previously stated</p>	<p>(a) 7D</p> <p>(b) 6A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>objectives of reducing pollution by substituting electric for petrol/diesel would be achieved.</p> <p>(c) In conclusion this change in policy seems to be nothing but a cynical income generator, penalising those of us who have already made a big financial commitment to reducing CO2 omissions.</p>	(c) 8A
114.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 30th January 2024</p>	<p>I am writing in response to the proposal to increase substantially Resident Parking permits.</p> <p>(a) In your submission you state that emissions in Westminster are amongst the worst in the country. I submit that this has little or nothing to do with residents - whose typical annual mileage in the City is almost certainly also amongst the lowest in the country. It is due to the enormous number of lorries and other commercial traffic who use central London as an elongated 'rat run' from west to east and vice versa. Most modern cars have extremely low emissions nowadays, and even the so called gas guzzling SUVs are remarkably clean. It is abundantly clear that this is simply an attempt to raise further funds for other purposes. It has nothing to do with a cleaner City (which these increases will not achieve). The frictional cost of changing cars also makes it impossible from a financial point of view to 'downsize' in order to save on the cost of a permit. So, motorists essentially have no choice but to lump it. The end result is little or no change to pollution levels, but substantially enlarged revenues for the City.</p>	(a) 11B, 8A, 11D

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(b) If the City of Westminster needs more money then it should simply say so, and consider the various ways in which this can be raised. Hoisting the burden on residents who barely use their cars and whose impact on pollution is minimal is simply a line of least resistance and will be remembered at the ballot box.</p>	<p>(b) 8A, 3C</p>
<p>115.</p>	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 30th January 2024</p>	<p>As a resident holding an F parking permit in Westminster, I am writing to formally reject the proposal to increase resident parking charges for the following reasons:</p> <p>(a) Lack of Substantiated Data: The proposed argument for increasing resident parking charges lacks concrete data supporting the notion that such an increment would significantly reduce the number of resident cars parked on the road or encourage residents to opt for vehicles with smaller engines. Without substantial evidence, it is challenging to justify the proposed adjustment.</p> <p>(b) Revenue-Driven Motivation: It is my perspective that the suggested increase in resident parking charges appears to be primarily motivated by a desire to bolster the council's revenue, with the guise of environmental benefits. I recommend a more transparent approach that focuses on authentic environmental improvements rather than using them as a pretext for financial gain. In lieu of increasing resident parking charges, I propose alternative strategies to enhance air quality</p>	<p>(a) 11A</p> <p>(b) 8A,</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>in Westminster by promoting the use of public transportation:</p> <p>(c) Reduction of Pay-As-You-Go Parking Bays: Consider a reduction in the number of pay-as-you-go parking bays to discourage private vehicle usage in favour of more sustainable transportation options.</p> <p>(d) Substantial Parking Charge Increases for High-Emission Vehicles: Implementing higher parking charges, especially for vehicles with higher emissions, serves as a more targeted approach to discourage the use of environmentally harmful cars. I understand that adopting these strategies may result in a reduction of the council's revenue, which may not align with your objectives. However, it is noteworthy that the current trend of converting resident parking spaces into pay-as-you-go areas contradicts the purported aim of improving air quality. Encouraging residents to drive into the city centre appears counterintuitive to the broader environmental goals we should collectively pursue.</p> <p>I appreciate your consideration of these points and look forward to a more comprehensive and data-driven discussion on how to genuinely enhance the environmental sustainability of transportation in Westminster.</p>	<p>(c) 71</p> <p>(d) 71, The City Council is not aware of any trends of converting residents' parking to pay-to-park bays. Each location is evaluated based on the anticipated needs of that area for visitor parking, residents' parking, etc. The City Council strives to maintain a balance of parking types to meet local needs.</p>
116.	<p>██████████</p> <p>████████████████████</p>	<p>I am writing to express my opposition to the Resident Permit Changes regarding City of Westminster Parking Services (8056/PJ).</p>	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>Email dated 30th January 2024</p>	<p>(a) I have been a resident of Westminster since [REDACTED] during which time I have already been compelled to sell one vehicle due to ULEZ compliance rules. Now, less than twelve months after buying a different car (at considerable personal expense), I am being told that the cost of my parking permit will triple. It is unjust of the council to keep moving the goalposts in this way.</p> <p>(b) Further, I note that the proposals cite 'highest carbon emissions and worst air quality' as justification - While air quality issues may be true, I ask: Are they attributable to residents or to visitors/transients? Bear in mind that the borough includes a significant number of major thoroughfares, including:</p> <ul style="list-style-type: none"> • Finchley Road/Wellington Road/Park Road - One of the main routes from the M1 Motorway into Central London • Westway - One of the main routes from the M40 motorway into Central London • A501, A4202, and Vauxhall Bridge Road, arterial roads which connect many London Boroughs <p>(c) Given the local government's significant investment in ANPR for ULEZ/congestion charge monitoring, I think it is not only plausible, but only fair to perform traffic analysis to determine whether the majority of traffic in the borough is attributable to residents, or non residents. If the latter is substantially higher, then on what grounds should</p>	<p>(a) 7E</p> <p>(b) 11B</p> <p>(c) 11A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		residents be forced to foot the bill for non-residents?	
117.	<p>[REDACTED]</p> <p>Email dated 30th January 2024</p>	<p>I think the way the charges are calculated are unfair based upon co2 emissions.</p> <p>For example. I own a car which I park in residents parking near my home. I only use my car about once every [REDACTED] to leave London via the A4/M4 to care for [REDACTED]. And therefore my co2 emissions in Westminster are negligible and so, for me, the charges based upon co2 are grossly unfair.</p> <p>I am happy to pay reasonable charges to cover the administration and running of residents parking but this should not be based on co2 emissions.</p>	7G, 7I
118.	<p>[REDACTED]</p> <p>Email dated 30th January 2024</p>	<p>I wanted to reach out to you regarding the proposed new parking permit system that's set to be implemented in April. As an electric car owner, I am concerned about the potential charges associated with the new permit.</p> <p>(a) Firstly, I wanted to express my support for initiatives that promote sustainable transportation, such as the increased adoption of electric vehicles. However, I believe that charging electric car owners for a new permit undermines the incentive to choose zero emissions vehicles.</p> <p>(b) In order to encourage more people to make the switch to electric cars, it's crucial to provide</p>	<p>(a) 7D</p> <p>(b) 6A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>adequate infrastructure, including charging zones. I would like to suggest that alongside the new permit system, there should be an increase in the number of available charging zones and also dedicated areas for electric vehicles charging only throughout the borough. This would not only benefit current electric car owners but also encourage others to consider making the transition.</p> <p>(c) By exempting zero emissions vehicles from the new permit charges, we can maintain the positive momentum and motivation for individuals to choose electric cars. This would align with the goal of reducing pollution and promoting sustainable transportation options by 2040.</p> <p>I appreciate your time and consideration in reviewing this matter.</p> <p>Thank you for your attention to this important issue.</p>	(c) 7A
119.	<p>██████████ ██████████ ██████████ Email dated 30th January 2024</p>	<p>I wanted to express my support for the change in pricing for permits, as detailed below, to take account of how polluting the vehicle is.</p>	2A
120.	<p>██████████ ██████████ Email dated 30th January 2024</p>	<p>(a) I am writing to express my objections to the proposed changes in parking permit prices. There does not appear to be any 'green' logic being applied to the pricing structure which is based on the size of the car rather than the amount of times</p>	(a) 7I, 3B

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>it's actually being driven (and therefore releasing emissions). It also doesn't take into account those with disability/special needs who may need a larger car to transport equipment such as wheelchairs.</p> <p>(b) Furthermore, the rises are extortionate and far beyond what anyone could consider reasonable.</p> <p>I would urge you to reconsider these changes immediately.</p>	(b) 3C
	Email dated 9 th February 2024	I suggest you also look at the outrage about this on local neighbourhood forums and the neighbourhood apps.	The City Council can only consider submissions made through the Traffic Order consultation process where the grounds for objection have been provided.
121.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 30th January 2024</p>	<p>(a) I received your email on Sunday 28th January 2024 -completely spoiling a quiet evening in front of the telly- regarding your proposals for changing the pricing structure of residents parking permits based on their car emissions. I can also see that this idea has been in your pipeline for nearly a year. It's such a shame that you didn't let me know about this sooner, as I only upgraded my car three months ago. I'm sure you'll appreciate that purchasing a car is not something done on a whim, and requires serious thought and raising of finance before going ahead. My previous car which I owned from ██████████ and ULEZ compliant, thankfully. Alas it already had 95,000 miles on the clock when I bought it and became increasingly unreliable and subsequently expensive to fix.</p>	(a) 7E, 8E

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>Thus returning to [REDACTED] last summer after a stint [REDACTED] seemed the perfect time to invest in a better car. The thought being that with returning to W2 my new car would hardly be used at all. I'm fortunate that I have so much within walking distance; Waitrose, M&S, Rymans, my doctor's surgery, accountant, and so on, and the distances I can't walk, say beyond 2 miles, I'll happily take the bus. However I have family, and [REDACTED]. I'm also respectful of the carbon emissions caused by flying so, as and when I can afford to go on holiday it's to Europe with my car via the ferry.</p> <p>(b) I usually make only about [REDACTED]. [REDACTED] And when I do go on these long trips I plan ahead and utilise the petrol costs to make each trip economically viable and practical. Thus, I may well fit in other friends [REDACTED] and stop at a garden centre or do a big shop at the supermarket for things that I can't get locally or are considerably cheaper. I am not cruising round London willy-nilly. Additionally my car has been invaluable for the recent moves I have made within London and to Westminster's only tip which is curiously based over the river in Wandsworth. Much better to use my ULEZ complaint car than some diesel truck or the like, eh? Heaven's only knows why, if you are so intent on making our air cleaner, you don't have a tip in</p>	<p>(b) 71, 3B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>your own borough.</p> <p>(c) Yes, I know about Westminster wanting to clean the air and reach Net Zero in the next few years but the hypocrisy of Westminster's planning department not allowing residents to replace leaky sash windows with like for like double glazed sealed units thus forcing residents to burn more fuel to stay warm in the colder months is hardly making your borough a safer and fairer place.</p> <p>(d) If pollution caused by car emissions (and that includes EVs as well) then surely to God the most qualifying reason is not the individual emissions per car but the amount of time motorists are spent running their engines whilst on your roads. In that respect the much hated ULEZ expansion scheme is actually fairer than your proposed scheme. Actually that leads me neatly on to another sore issue. Firstly the 20mph speed limit that has been rolled out means that drivers are constantly shifting between 1st, 2nd and 3rd gears for fear of not exceeding the speed limit. This action results in higher emissions and more wear and tear on the clutch and gearbox. Hardly a sensible measure to reach lower emissions, is it? Perhaps if you're truly serious about reducing emissions you would hand out discounts to all motorists who drive an automatic car. Also the mpg of all vehicles is vastly reduced when crawling along at such a slow speed meaning that all London motorists are having to buy and burn more petrol than before. Due to all the cycle lanes and LTN's that have sprung up</p>	<p>(c) Unfortunately, this consultation cannot consider concerns about the City Council's planning policies. This may be an area you wish to raise with your local ward councillors or raise with the City Council through its official complaints procedure so that it can be considered by the appropriate department.</p> <p>(d) 7I, 7B, 10B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>journeys times are taking longer and cars idling are on the road, relative to distance travelled, for far longer. The amount of road space available for motorists has been nibbled away at for the last few years whilst the number of vehicles has greatly risen, in no thanks due to on-line shopping deliveries and Uber taxis.</p> <p>(e) So this cleaner air that you bang on about so much. It has already been proved that all these measures have made negligible changes to the air quality which, is actually rather good. No, in fact, amazing considering how your draconian traffic measures have made congestion in London considerably worse.</p> <p>(f) To sum up you are penalising Westminster residents for the simple fact that we live where we do, not for how frequently we use our car. Sure if you want to charge non residents who want to come into London for a day by charging more then fine but don't hit us, your loyal citizens with punitive and illogical higher costs simply for making Westminster our home. Of course you could argue that all these friends and relatives could come and visit me, [REDACTED] [REDACTED]. How safe is your tube network these days? Or my sister and her husband who unless they visit on a Sunday must not only pay exorbitant costs to park but move their car every four hours. Westminster prides itself on its approach to mental health yet with the Congestion Charge, LEZ, ULEZ</p>	<p>(e) 11A</p> <p>(f) 7B, 3C, 6D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>and now this you are making it harder and more expensive for us to see our nearest and dearest.</p> <p>Oh and one final thing, if you want to reduce pedestrian accidents etc then may I suggest a public awareness campaign aimed at all those who step out onto the road whilst staring at their phones. It would cut the number of phones being snatched as well.</p> <p>I have no idea who you are or what role you play within Westminster City Council but I got your name and email address from our local Nextdoor group which is buzzing with anger at your proposals. I have also copied in my MP just for good measure. If this proposal does not concern you then please advise exactly who I should be contacting. Thank you.</p>	
	<p>Email dated 10th February 2024</p>	<p>Forgive me for writing to you, but your email address has been listed in an ongoing forum on Nextdoor. I am aware that Westminster City Council, as part of their drive to provide cleaner air for the residents of Westminster, are proposing to increase the parking charges of certain vehicles. I cannot see how the proposed changes will assist that.</p> <p>(g) As you are penalising the car's taxable emissions rate rather than the amount of times a car is used you will penalise me more for the car that I simply own rather than how often it's driven. If you are truly focussed on reducing emissions then</p>	<p>The City Council replied to [REDACTED] on 1st March 2024 to confirm that:</p> <p>(g) 7I, 10B. The charge under discussion is for a resident permit which enables the vehicle to be parked in resident bays in the zone of your residence. You are therefore correct that the resident permit charge bears no direct correlation to</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>it may make more sense to get rid of all these blanket 20 mph zones; car users petrol consumption is greatly increased trying to maintain a 20 mph speed when that is, actually possible. Equally constantly changing from 1st, 2nd and 3rd gears, causes extra wear and tear on the clutch and gearbox. Also please stop nibbling away at the amount of the road area available by the introduction of street landscaping projects. You are currently proposing such a thing on the junction of Sussex Gardens and Edgware Road which, as usual, advocates reducing the amount of road drivers can enjoy.</p> <p>I have only recently changed my vehicle for a very similar model with considerably less mileage at a cost of just over £2,000.00. When I purchased this car [REDACTED] it was my intention to retain this car for another six or seven years with the aim of doing about 7-8 thousand miles per annum (less than 5% of those within central London). By 2030 [REDACTED] and my personal circumstances will probably have changed. Or, it may well be the case that whichever government is at the helm by then that petrol cars will have been outlawed or penalised to such an extent that owning one and being a resident of Westminster makes the use of one totally prohibitive.</p> <p>(h) If your proposals succeed I will not be changing my driving habits one jot. Firstly because I do not use my car for petty journeys within your borough. Secondly I own a vehicle because I do not</p>	<p>how often the vehicle is driven. However, we have attempted to link the charge to our stated intention of encouraging the use and ownership of low-polluting vehicles and discouraging that of more polluting vehicles. The schemes therefore aim to 'nudge' those 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 or the council's car club schemes.</p> <p>Whilst I note your comments re petrol consumption, the 20 mph zones have been introduced as part of the Council's commitment to making our streets safer, healthier and cleaner. The idea is that slowing down traffic speed reduces the severity of accidents and makes it safer to walk and cycle, thus helping improve public space and encourage healthier, more active lifestyles.</p> <p>Likewise, street landscaping and 'greening' is another environmental initiative which aims to improve air quality and wellbeing. Road space is only used where demand and occupancy levels allow it.</p> <p>(h) 6D, 3B. Noted. In reference to the earlier comment regarding the aims of the scheme, it is acknowledged that they will not persuade or 'nudge' all. Even some of those who may wish to change</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>feel safe on public transport after dark, and simply could not carry the amount of items in such a way. Next week [REDACTED] [REDACTED] [REDACTED] let alone use public transport. [REDACTED] [REDACTED] So you see to achieve visiting some five different people I will have made only one trip out of your borough and one trip back in. Over Easter [REDACTED] [REDACTED] Again I'm visiting several different people but condensing it all into one trip to reduce emissions. On both of these trips, what with presents, luggage and other effects I simply could not manage by public transport. I could hire a car but as hire cars do not come with a resident's parking permit then parking close enough to load the car presents a real headache.</p> <p>(i) Your proposals are, I believe, counter productive, I will be penalised no further for driving my car daily than if I don't drive it at all for a year.</p> <p>(j) I also think it is incredibly mean to introduce this change at such short notice. I don't know much</p>	<p>their habits or personal circumstances may not be able to, but it is the hope that it will persuade / dissuade enough to make a difference.</p> <p>(i) 7B</p> <p>(j) 8E, 7B. Westminster actually has some of the highest carbon emissions and worst air quality of</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>about other people's spending habits but I can't change my car at the drop of a hat. Would not a year's notice have been kinder and more productive if you believe such a change is vital to Westminster's cleaner air? My [REDACTED] (Petrol) is perfect for long journeys, driving to the continent for a holiday every year or two. Again, choosing the emission friendly option rather than flying. It's a small SUV, not wide, high or heavy - I can fit a lot of bulky items in. Yet I am staggered that you have placed my modest vehicle in the same band as a 2.0 ltr Ford Tourneo (Diesel) and a 2.3 ltr Ford Focus (Petrol). I thought Khan's ULEZ had sorted out the pollution problem. Not that I'm aware of our air being dangerously mucky.</p> <p>(k) Of course I could halve the amount of journeys I make within Westminster if you hadn't made it so difficult and expensive for my friends and family to visit me by car where I live. And yes my friends etc are [REDACTED] immediately suggesting that this latest ploy of yours is ageist too. I worked my backside off to be able to buy a place in [REDACTED] to be central for my work, which I no longer do. If Westminster persist in this misguided attack on the hapless motorist then what would all that hard work have been for? I love living here, I have practically everything on my doorstep, within walking distance, of course. But my friends have moved away, mostly to have children and raise families or because of the cost of housing. Would you rather I did the same? If you persist in this drive to make car ownership within</p>	<p>any national local authority, so our proposed emissions-based charging schemes, which align with WCC's Fairer Westminster vision and a number significant WCC strategies and policies concerning air quality, look to deliver local positive impacts through the provision of discounts for 'cleaner', less polluting vehicles. The banding we have proposed is based on CO2 emission levels as per the DVLA's records, with a diesel surcharge added for pre-2015 diesel vehicles.</p> <p>(k) 11D. I do not consider the proposed schemes to be ageist. In obtaining the Cabinet Member decision to approve the schemes, we have conducted an equalities impact assessment (EQIA). Whilst this concluded that there could possibly be some negative ramifications for disabled people and those on low incomes which should be mitigated, it identified a positive impact 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. The EQIA is published online. https://committees.westminster.gov.uk/documents/s56780/EQIA%20Parking%20Fee%20Structure%20Review.pdf</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>the capital so fickle and expensive then you will achieve an exodus out of our beloved Westminster, with the associated downturn in economic tax and revenue that you currently enjoy.</p> <p>(l) It is clear that due to on-line shopping the number of vans using your roads has increased exponentially, adding to the congestion for which central London has sadly become infamous for. Yet I also see that you plan to exacerbate the problem by allowing up to three vehicles per permit. Where is the logic in this?</p> <p>(m) From the hated ULEZ expansion zone to this new scheme of yours, the whole thing smacks of a money grabbing ploy to fleece existing Westminster residents under the now disproven guise of achieving even cleaner air.</p> <p>I do not approve of your proposals.</p>	<p>(l) 5A. The current resident permit scheme allows an individual to have two vehicles on a single permit, paying just for the higher charge of the two vehicles. We propose to change this policy so that each vehicle requires its own permit, payable separately, and we are increasing the allowance by one to three vehicles per individual, but with an additional charge on the second and third permits. There is currently no limit to the number of permits we can issue per household and that policy is not due to change. The additional charge for a second and third permit is to act as a proportional deterrent and is an acknowledgement that additional vehicles take up additional on-street space, sometimes where available space may already be at a premium.</p> <p>(m) 8A. It may be worth me pointing out that we are forbidden by law from introducing schemes purely with the aim of generating extra revenue. However, the creation of a surplus will not in and of itself be unlawful providing the primary motivation for or intention of the proposal is the achievement of objectives which are consistent with our traffic management duties as laid out in the Road Traffic Regulation Act 1984. We are also bound by legislation to re-invest any surplus made from on-street parking services in prescribed transport</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
			related activities only. This is recorded through a memorandum statement, the Parking Places Reserve Account (PPRA), which details the Parking surplus and how it has been reinvested. In 2022/23 for example, the four main areas of funding were highways & transportation improvements / maintenance, environmental improvements and street cleansing, concessionary fares and Home to School transport.
122.	<p>██████████ Resident ████████████████████ Email dated 31st January 2024</p>	<p>Motor vehicles in UK already pay a heavy tax based on their emissions in the form of Road Tax, how can you justify applying a further emission charge for exactly the same vehicles. if this double tax is allowed then anybody could start the same scam such as cross channel ferries, multiple stretches of roads, every other council car park, in fact as soon as you open the vehicles door you could be charged an emissions tax on top of the vehicle's annual Road Tax</p> <p>Double Taxing is a cheap scam on vulnerable motorists.</p>	7L, 3C, 3D
123.	<p>██████████ ████████████████████ Email dated 31st January 2024</p>	<p>The new resident parking scheme is extremely unfair and a blatant money grab. We bought diesel ten years ago because it was eco friendly at that time. It is worse for the environment for us to buy a new car because the production produces enormous pollution. Leave the pricing as it is because the changes are unfair.</p>	8A, 9A
124.	████████████████████	I write to support the price rises for parking in	2A



APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 31st January 2024</p>	<p>Westminster and applaud the Mayor for his continuing efforts to reduce car pollution in London. I will, I hope, this year give up my elderly car (residents permit just renewed) and be able to buy an electric car and in my very small way help towards making London a cleaner healthier great City.</p>	
125.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 31st January 2024</p>	<p>To whom it may concern I would like to register my complaint about your proposed new parking charges for [REDACTED]. I find it completely unacceptable that these new charges are being mooted. I am [REDACTED] who only uses my car once a week to take my cleaning to the launderette and pick it up, in a cost of living crisis you are adding to the distress of many .instead of wasting council tax payers money on the high street in [REDACTED] in my opinion and others a complete waste of time, how about doing something to help the people who are struggling to pay their bills and live. I look forward to your reply.</p>	3E
126.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 31st January 2024</p>	<p>(a) I hereby submit my objection to cancel the pay-to-park scheme for electric and plug in hybrids.</p> <p>[REDACTED]</p> <p>require to park around our house to attend her needs. They also carry equipment they use for the [REDACTED] so it is impossible to use public transport. We all depend on this scheme and the</p>	(a) 3B

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>scheme abolition will impact their ability to work and therefore the wellbeing [REDACTED].</p> <p>(b) It's also beneficial to our community to encourage low emissions vehicles. Abolishing the scheme will mean that people will go back to petrol and diesel cars as these are much less expensive to run.</p>	(b) 7D
127.	<p>[REDACTED] Resident</p> <p>[REDACTED]</p> <p>Email dated 31st January 2024</p>	<p>(a) I am a Westminster resident and find this new proposal, just another Stealth Tax on Westminster residents.</p> <p>(b) We are pensioners and have lived in Westminster for 10+ years. When we moved here, we following government advice, went to one vehicle, a hybrid. As we have [REDACTED] [REDACTED] we chose a vehicle which would accommodate legally three child car seats, hence a SUV.</p> <p>As it is a hybrid vehicle, we have until now had a very generous free residents parking permit.</p> <p>Now following your recent letter, we will be required to pay £241 pa, which amounts to a 241% increase. How does this fit in cost of living price increases and inflation? It does not of course. A parking scheme based on emissions for residents is absolutely BONKERS! What does emissions have to do with parking, whilst parking we are emitting anything!</p>	<p>(a) 8A</p> <p>(b) 3E, 7B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(c) Again, as residents of Westminster, we really do rely on the excellent public transport and therefore only drive out of central London. So we are being penalised for trying to be good citizens. Once again the motorists are the subject of extra charges, in recent months/ years, the congestion charge and the very controversial ULEZ.</p> <p>(d) On top of that during COVID, more stealth actions were taken, Park Lane and Regent street, major North South routes, both having been subjected to reduce lane widths and speed limits, along with the Marylebone Road, all of which have a 20 mph limit. Taxis can't stop, buses have nowhere to pull in, hence CONGESTION AND POLLUTION.</p> <p>It all makes life for a resident more and more difficult , with a bus ride from Baker street to South Kensington taking over an hour!</p> <p>To me it is all Bonkers.</p>	<p>(c) 7L</p> <p>(d) 10B</p>
128.	<p>  Email dated 31st January 2024</p>	<p>(a) Thank you for the opportunity to provide feedback on the proposals for resident parking charges.</p> <p>I agree with the recommendations regarding charges based on emissions and this is very welcome.</p> <p>(b) I do not agree with only charging a modest extra charge for residents who have more than one</p>	<p>(a) 2B</p> <p>(b) 5C</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>vehicle per individual.</p> <p>Spaces in Westminster have a very high value and anyone who wishes to own and run 2 or more vehicles could easily afford to pay significantly more for parking permits. £20 a week would not be unreasonable.</p> <p>I would also suggest that many of these permits are granted to people who do not live in their Westminster homes for much of the time.</p> <p>Thank you for the opportunity to share our thoughts.</p>	
129.	<p>██████████</p> <p>██</p> <p>Email dated 31st January 2024</p>	<p>I am writing to submit my objection to the proposed changes for parking charges.</p> <p>(a) I strongly object to the proposal. I drive an electric vehicle which emits zero emissions. This is the primary reason why I, and many others, purchased an electric vehicle.</p> <p>The current pricing allows us to make use of the numerous free parking bays in Westminster in order to commute to our work environment.</p> <p>(b) The proposed changes are extortionate, at rates which are several hundred percent higher than the current cost. This is crippling to many commuters and will negatively affects many small businesses as well.</p>	<p>(a) 12B</p> <p>(b) 3D, 12A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		I urge you to abandon this monstrous price increase.	
130.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 31st January 2024</p>	<p>I am against this change for the following reasons:</p> <p>(a) It penalises people today based on new rules that did not exist when they purchased their car</p> <p>(b) It penalises the poor more as they tend to drive older cars without the modern lower emissions of newer cars.</p> <p>(c) It is unfairly lenient on electric cars which despite having no tailpipe emissions still have huge environmental impact</p> <p>It is unfairly lenient on electric cars which is against the Westminster policy of reducing car ownership</p> <p>5. Given that diesels emit dangerous NO2 gases, a £50 surcharge so less than £1 a week is just not an adequate deterrent</p>	<p>(a) 7E, 8C</p> <p>(b) 3A</p> <p>(c) 5E</p>
131.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 31st January 2024</p>	<p>I read the proposed changes to the Westminster resident permit scheme with interest.</p> <p>(a) I agree that more needs to be done to address the appalling air quality in Westminster and I am glad to see that those with EVs are being encouraged and given additional incentive.</p> <p>I have two comments:</p>	<p>(a) 2E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(b) There needs to be a considerable increase in the number of EV chargers in Westminster. Where we live there are lamentably few and those that are there (the ubricity or Shell lamppost chargers) are often out of order or the app does not work. It would excellent to have more superchargers installed e.g. Instavolt who can be found in Chelsea, but not it seems in Westminster or certainly near the F parking zone. It would be helpful as part of the scheme the number of charges and plans for chargers is clearly publicised.</p> <p>(c) I do hope that the council can charge more to those fume producing delivery vehicles and also the number of non-elective buses is still considerable. Given that most people who have a permit will drive in and out, but very rarely around Westminster. Those who are driving around (deliveries etc) should be addressed too as a solution to the problem.</p>	<p>(b) 6A</p> <p>(c) 2E</p>
132.	<p>██████████ ██████████ Email dated 31st January 2024</p>	<p>Regarding the subject proposal to “withdraw the current concession for electric vehicles and plug-in hybrids, allowing those vehicles to park up to the bay's maximum stay for a minimum 10-minute payment”, I would like to object based on the following:</p> <ul style="list-style-type: none"> Your main argument is as follows: “Introducing these schemes aims to encourage the use of low-polluting vehicles and discourage the use of those that are more polluting.” The explanation goes further: “Vehicles will be charged 	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>primarily based on their level of Carbon Dioxide (CO2) emissions.”</p> <p>(a) I would like to point out that pollution comes primarily from SOx and NOx emissions. CO2 contributes to global warming and, indeed, should be eliminated, but the pollution directly impacting health comes from other types of emissions, with NOx being the most dangerous, particularly for young people.</p> <p>(b) Electric vehicles (EVs) are the only type currently available that do not emit any of the three primary pollutants. Even plug-in hybrids emit CO2, SOx and NOx when not running on electricity.</p> <p>Therefore, I would strongly encourage pure EVs take-up through further incentives. That means keeping the minimum 10-minute payment for pure EVs only, or making at least significantly cheaper parking for pure EVs.</p> <p>(c) Due to personal circumstances, our visits to the West End shows depend heavily on car use. As I have a pure EV, it made a lot of difference to us (██████████) when planning to attend and contribute to local businesses in a small way. If you switch to treating pure EVs in the same way as all other cars, I see our visits to the West End disappearing. We probably won't be the only ones giving up at a time when local businesses need our full support. And Londoners, in general, need further encouragement to switch to pure EVs.</p>	<p>(a) 11A</p> <p>(b) 7A, 7D</p> <p>(c) 12A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
133.	<p>██████████ ██ Email dated 31st January 2024</p>	<p>I refer to your document Tariff and Permit Pricing Restructure as per this link - Westminster City Council - Council, government and democracy (westminstertransportationservices.co.uk)</p> <p>I note that the council proposes to introduce emissions-based charging for both pay-to-park casual kerbside parking and residents' parking permits to incentivise cleaner and smaller less polluting vehicles.</p> <p>I refer specifically to pay-to-park bays.</p> <p>(a) Being sympathetic to environmental issues, I have purchased a zero emission electric car, a ██████████, which is one of the smallest and lightest zero emission cars available in the UK to drive into Westminster, so it is exactly the type of vehicle which the council is encouraging drivers to use, as CO2 emissions are zero and the vehicle creates relatively very little emissions and environmentally negative materials, by for example brake utilisation, as compared to say a Tesla or Range Rover.</p> <p>I currently park in Westminster, Zone E and pay 94p for 4 hours of use. For the day, I will pay £2.82. So my question is, given the above and the fact that the council is looking to incentivise cleaner less polluting vehicles, why is the daily charge, for this car in Zone E going to move from £2.82 per day to £44.10, an increase of over 15 times.</p>	<p>(a) 7A, 7E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(b) How can this new pricing in the above example, where people work and spend money in the City of Westminster align with the Fairer Westminster strategy, which the council states that it does?</p> <p>I have sourced this information from your document entitled CITY OF WESTMINSTER INTRODUCTION OF EMISSIONS-BASED CHARGING, AMENDMENTS TO PARKING CHARGES, AND CHARGES FOR ADDITIONAL RESIDENTS' PERMITS which is available here: 8056 - Tariff and Permit Pricing Restructure (Emissions-Based Charging) - NoP.pdf</p> <p>I look forward to hearing from you.</p>	<p>(b) 3D</p>
	<p>Email dated 7th February 2024</p>	<p>Thank you for your email and for taking the trouble to obtain an interim reply from Westminster Council.</p> <p>In reaction, I would comment as follows (in bold):</p> <p>(c) <i>Whilst EVs are of course less polluting than petrol or diesel vehicles, their use still contributes to congestion - Congestion is to be mitigated by Congestion and Ulez charges, not excessive parking charges.</i></p> <p>(d) <i>..and they still produce some degree of harmful pollutants such as particulate matter from tyre wear and brake pad wear. - EV 's have regenerative braking rendering the use of</i></p>	<p>(c) 7L</p> <p>(d) 11A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>brakes almost unnecessary to retard a vehicle's speed from the giddy levels of 20mph, particularly vehicles such as [REDACTED]. Such is the strength of regenerative braking that <u>Volkswagen has switched from brake discs and pads, to brake drums, on the rear of its ID series of EVs, and on other EVs using its modular electric drive matrix (MEB) platform like the Skoda Enyaq.</u></p> <p>(e) <i>Although we of course wish to encourage the use of EVs over more polluting fuel types, hence the proposed charging structure - Zone E Petrol vehicles such as a Supercharged V8 Range Rover (surely a classic example of car you would wish to discourage use of) would currently pay £5.69 per hour to park in Zone E. Under the proposed scheme This will rise to £8.82 an increase of 55% per hour and per day. The EV equivalent for increase as I have mentioned is 469% per hour and 1563% per day. How exactly is that price differential going to encourage a move to EV, or motivate those who have already done so to maintain ownership. It will in fact achieve the exact opposite.</i></p> <p>(f) <i>in the interest of air quality we still need to ultimately encourage journeys, wherever possible, to be made via even more sustainable modes of transport such as walking, cycling, car clubs or public transport.” Baroness Parminter Chair of a recent House of Lords report on EV, last week commented that evidence shows that the</i></p>	<p>(e) 7D</p> <p>(f) 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>government must do more to encourage people to adopt EV. Mayor Khan for his part has imposed ULEZ and provided much nebulous data (TfL's advertisements have been rebuked by the Advertising Standards Agency for making misleading environmental claims). Westminster Council's policies are disingenuous as is evidenced above.</p> <p>(g) <i>"it is felt that the minimum payment concession has become too generous and out-of-date, and is thus unsustainable. No other local authority in central London offers such nominal parking charges which overly encourage driving into/around their borough."</i> - This is perhaps the real reason for raising prices under the cloak of improving air quality and reducing emissions. the council is raising prices because in its opinion, it can.</p> <p>For these reasons I would urge Westminster Council to reconsider this ill conceived and counterproductive proposal.</p>	(g) 8A
134.	<p>██████████ Resident ██████████ Email dated 31st January 2024</p>	<p>Objection to proposed changes</p> <p>I refer to the Council's proposed change to charges for both casual parking and residents' parking permits in the Westminster area, with effect from 1 April 2024.</p> <p>As somebody who lives in the area, whose children go to School in the area, and somebody who often</p>	7B, 7D

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>park in the area in pay and display bays, I hereby lodge my firm objection to the proposed charges for the following reasons:-</p> <p>The current system helps with the problem you outline in the notice, namely pollution. Electric and/or Hybrid Vehicles have low or zero emissions, so why should the Council want to charge them more than now for parking in the Westminster area; or for their parking permits. Their charges should remain the same, as then this will promote more people switching to EVs or Hybrid vehicles, which in turn will decrease pollution. Therefore, it seems perverse and counterproductive to increase charges on any EV and/or Hybrid vehicles, be that parking permits or pay and display parking.</p>	
135.	<p>██████████ Resident</p> <p>████████████████████</p> <p>Email dated 31st January 2024</p>	<p>Being a resident of Westminster I object on two grounds:</p> <p>(a) The incremental surcharge per additional permit. A lot of households have two cars. Can you please provide the evidence that the council has produced that charging £50 will incentivise cleaner less polluting vehicles?</p> <p>(b) The proposal is invalid. Residents were only sent details of this via email and not post. It was not clear how to object (see below). Therefore, this consultation needs to be submitted using the approved communication methods with an obvious way of objecting.</p>	<p>(a) 11A</p> <p>(b) 8D. There is no requirement to send consultation information via post. In the case of residents' permits, the City Council holds email address records for all permit holders. Only one email was not delivered due to an incorrect / redundant email account.</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
136.	<p>██████████</p> <p>██</p> <p>Email dated 31st January 2024</p>	<p>I would like to oppose the proposed residents' parking changes (i.e. increases) based on 4 grounds - negligible environmental impact, socio-economic targeting, high expenses, and scant behavioural impact.</p> <p>To go through these one by one:</p> <p>(a) Negligible environmental impact The UK has come along in leaps and bounds relative to other countries in terms of reduced environmental emissions. We have done a great job, and we should pat ourselves on the back and mark such a job completed. London still has pollution, yes, but far less than similar cities. As someone who has spent large amounts of time in high polluting cities like Hangzhou, Shanghai, Beijing and Chennai, the amount of pollution experienced by London is far less (indeed, see how much less it pollutes than the rest of UK on a per-capita basis! https://naei.beis.gov.uk/laghgapp/). Therefore I contend that the necessity of climate-related charges are overstated. The aforementioned cities will pollute the planet and their own people eons more than London will, and any climate emissions won't make much of a difference regardless.</p> <p>(b) Socio-economic targeting One of the trends I have noticed is the socio-economic divide experienced by people in our part of London. Many of those who do not own cars are professionals with high earning jobs who just get the tube into work. Car owners, in contrast, are</p>	<p>(a) 11F</p> <p>(b) 3B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>disproportionately working class, and on average on lower incomes than the professional non-car owners. Many of these working class car owners depend on their cars for their livelihoods. The struggling already have to contend with the costly ULEZ charges; these proposed parking increases will only increase the burden that these people experience.</p> <p>High expenses The proposed charges will hit these car owners hard, especially ones who happen to own an old car or multiple cars. In the latter camp will exist many families who depend on both cars for their day-to-day work. The second car is not a luxury, but they will be forced to pay even more than double for the right to keep their second car there. Not only will these working-class be targeted, but they will be targeted and made all the more to suffer.</p> <p>(c) Scant behavioural impact Governmental and council regulations often rely on a combination of carrots and sticks. I imagine that the primary justification for these new rules will rest on the hope that the increase in parking permit expenses will incentivise many car-owners to get rid of their car, or their second car, to reduce costs. This is not the case, because I contend car ownership to be inelastic; that is to say, someone who owns a car in London is reluctant to give up that car readily. The amount of extra charges required to really dent car ownership would be so high that they would inflict deep misery on the people on London far before</p>	<p>(c) 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>they even gave up their cars in the end.</p> <p>(d) What I would like to finish my objection with is that London already has so many car-phobic climate-related charges in place already. Need we break a butterfly on a wheel? All around me, discontent against London's leadership is growing; I feel that this may be the straw that breaks the camel's back.</p>	<p>(d) 11D</p>
<p>137.</p>	<p>██████████ ██████████ Email dated 31st January 2024</p>	<p>I have been a resident of Westminster and a resident parking permit holder for a number of years. I have read with interest the June 26,2023 Cabinet Member Report entitled "Parking Fee Structure Review" and its Appendix with regard to the new resident parking permit and casual parking charges policy.</p> <p>I am certainly in favour of reducing carbon emissions. I welcome the council's efforts to understand the causes of such emissions and its desire to implement policies to reduce those emissions.</p> <p>I have just a few questions:</p> <p>(a) The report states that the main objective is to reduce carbon emissions in the borough by altering vehicle ownership as a result of increased parking charges. What are your projections of vehicle ownership changes and resulting emission reductions as a result of the increased charges?</p>	<p>1B, The City Council replied to ██████████ on 9th February 2024:</p> <p>(a) In modelling the proposals we made some assumptions about vehicle and permit ownership going forward for the next two years. The assumptions made are that whilst total vehicles numbers would remain fairly static over this time period, we would see an increase in band 1 and 2 vehicles at the expense of those in bands 3 to 5, but</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS																					
			<p>with little movement in the highest band 6, as follows –</p> <table border="1" data-bbox="1406 308 2092 663"> <thead> <tr> <th data-bbox="1406 308 1547 424">Banding</th> <th data-bbox="1547 308 1812 424">Assumed Difference 2025</th> <th data-bbox="1812 308 2092 424">Assumed Difference 2026</th> </tr> </thead> <tbody> <tr> <td data-bbox="1406 424 1547 464">1</td> <td data-bbox="1547 424 1812 464">2.3%</td> <td data-bbox="1812 424 2092 464">2.3%</td> </tr> <tr> <td data-bbox="1406 464 1547 504">2</td> <td data-bbox="1547 464 1812 504">1.0%</td> <td data-bbox="1812 464 2092 504">1.0%</td> </tr> <tr> <td data-bbox="1406 504 1547 544">3</td> <td data-bbox="1547 504 1812 544">-1.5%</td> <td data-bbox="1812 504 2092 544">-1.5%</td> </tr> <tr> <td data-bbox="1406 544 1547 584">4</td> <td data-bbox="1547 544 1812 584">-0.3%</td> <td data-bbox="1812 544 2092 584">-0.3%</td> </tr> <tr> <td data-bbox="1406 584 1547 624">5</td> <td data-bbox="1547 584 1812 624">-1.3%</td> <td data-bbox="1812 584 2092 624">-1.3%</td> </tr> <tr> <td data-bbox="1406 624 1547 663">6</td> <td data-bbox="1547 624 1812 663">0</td> <td data-bbox="1812 624 2092 663">0</td> </tr> </tbody> </table> <p>We have also made assumptions that the diesel surcharge would apply to fewer vehicles over the next two years (2% in 2025 and 1% in 2026), and that residents who take up the option of second permits would drop to 4.5% in 2025 and 4% in 2026.</p> <p>These are of course just assumptions however, made purely for modelling purposes. It is not so much about absolute changes in vehicle numbers/types but about creating a supporting framework to encourage better behaviour and choices. One of the stated aims of the scheme is 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.</p>	Banding	Assumed Difference 2025	Assumed Difference 2026	1	2.3%	2.3%	2	1.0%	1.0%	3	-1.5%	-1.5%	4	-0.3%	-0.3%	5	-1.3%	-1.3%	6	0	0
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APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(b) The report states that road transport is the second greatest carbon emissions producer (~20% according to the report) in the borough of Westminster. Of the road transport emissions, what percentage is produced by private vehicles versus public/ commercial buses, coaches and transport vehicles?</p> <p>(c) The report [Cabinet Member report June 2023, section 4.1.2 CMR - Parking Charging Policy Review.pdf (westminster.gov.uk)] states that the largest carbon emission producers in the borough are commercial buildings. What percentage of total carbon emissions do commercial buildings represent? Which are the top 5 emission-producing buildings in the borough? As the largest source of emission production, what is the council's plan to address the emission output from these buildings and others like them?</p>	<p>(b) The split of emissions differs by pollution type. For example, according to the DfT, in 2021 cars and taxis were responsible for approx. 52% of transport-related Nitrogen Oxide (NOx) emissions but approx. 82% of transport-related Carbon Monoxide (CO) emissions. See env0301.ods (live.com) tables available at Energy and environment: data tables (ENV) - GOV.UK (www.gov.uk).</p> <p>However it should be borne in mind that we are only able to influence and control elements within our powers. We are looking to encourage better vehicle choices through the introduction of an emissions-based charging regime, but where vehicles are travelling through Westminster, or where no parking charges may apply (e.g. to commercial vehicles loading/unloading or to coaches picking up/setting down etc) there is limited opportunity for us to apply influence.</p> <p>(c) As per the most recent data available (2021) – emissions from domestic 282 ktCO2e and non-domestic buildings were 1,063 ktCO2e which, combined, are 84.27% of the borough's total emissions. Non-domestic emissions accounted for 66.6% of total emissions for the borough.</p> <p>The council does not have data on individual building emissions.</p> <p>To see what action the council is taking to address emissions in the built environment, please refer to our Climate Emergency Action Plan (Published</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(d) The report states that a number of other boroughs have already implemented emission-based resident parking permit charge schemes. I'm sure the council has analysed the outcomes achieved in these other boroughs as part of their research. Can you please provide what outcomes those schemes have achieved in terms of changes in vehicle ownership and emissions reduction?</p>	<p>2021) and most recent progress report (Published March 2023): https://www.westminster.gov.uk/tackling-climate-change-westminster/our-climate-action-plan. The council has specific actions aiming to improve the energy efficiency of the borough's building stock and support the transition of these buildings to sustainable energy sources.</p> <p>(d) Whilst we have consulted with other London boroughs as part of the process of developing our proposed schemes, for a number of reasons we haven't used empirical data as a benchmark. This is because London boroughs differ in terms of parking pressures and issues and each has different demographics and demands (as well as different scheme nuances) which can mean different outcomes – what may be an issue in Westminster may not be so in, say, Enfield or Croydon, and vice versa. Also, a number of the bolder, more ambitious schemes, such as the London Borough of Islington's emission-based charging scheme, have not been in place long enough to yield definitive results. However, we are able to point to evidence of our own experience. Since its introduction in 2017, our diesel surcharge scheme, which imposes a 50% surcharge on pre-2015 diesel vehicles when paying to park, has had a marked effect in reducing the amount of pre-2015 diesel vehicles using the service. This scheme was initially trialled in one zone of Westminster in June 2017 (F zone – Hyde Park, Marylebone and Fitzrovia) before being rolled out city-wide in August 2019. In the initial period</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(e) The report states that a financial impact model (revenue and capital implications) is required before any final decision and implementation of the charging changes. As the changes appear to be scheduled for April, could you please provide the financial impact projections?</p> <p>(f) What specific outcomes in terms of carbon emission output metrics (and over what time period) have you set for these parking charge changes to be deemed a success?</p> <p>(g) Finally, what specific air quality metrics will you be measuring to determine the success of this policy?</p>	<p>between June 2017 and February 2019 for example, there was a significant decline in pre-2015 diesels paying to park in F zone as a percentage of overall transactions; from 42% down to 28%.</p> <p>(e) The financial implications were outlined the November 2023 Cabinet Member report, which is published online. Please see section 8 of the report CMR - EBC Detail.pdf (westminster.gov.uk).</p> <p>(f) We have set no metrics, but in terms of outcomes we would expect to see an increase in the lower band transactions at the expense of the higher band transactions within 12-24 months.</p> <p>(g) As above, we are not planning to measure air quality metrics for this purpose as so many other factors affect air quality that it'd be impossible to isolate our emissions-based charging policy in this regard. Instead, we would look at our transaction data, and 'success' would see an increase in the lower band transactions at the expense of the higher band transactions.</p>
	Email dated 19 th February 2024	(a) Despite the upfront objective of improving air quality, there doesn't seem to be any measurable outcome to this policy other than a potential reduction in certain types of private vehicles. There will, of course, also be an increase in revenues for the Borough if the higher tariffs don't translate into materially lower private vehicle numbers.	(a) 11A, 8A

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(b) While I am fully supportive of the Borough pursuing cleaner and better air quality, I would have thought a policy such as moving the hugely polluting Coach Station out of Victoria (and all the resultant coach traffic) would do far, far more for the clean air objective than just raising taxes on private vehicles.</p> <p>Thank you again for your responses and I look forward to hearing more about how we can measurably improve air quality in the Borough.</p>	(b) 10B
138.	<p>██████████ ██████████ Email dated 1st February 2024</p>	<p>(a) I object to this notice giving 2 weeks' notice of a fundamental tax change from a local authority. It seems to be outside of Westminster Council legal remit. Charges that will be applied on top of National tax and London Mayoral tax on car parking, driving and licensing.</p> <p>(b) Proper consultation, followed by endorsement by voters is required.</p>	<p>(a) 8E, 8B</p> <p>(b) 8H</p>
139.	<p>██████████ Resident ██████████ ██████████ Email dated 1st February 2024</p>	<p>(a) Thank you for the opportunity to write in, although I suspect the decision is largely already made.</p> <p>Acting on the inducements you yourselves promoted, available till Dec 2025 my partner and I took out a lease in ██████████ for an electric car for two years. There were virtually no electric cars on the market at that time because one electric subscription company (Onto) had just</p>	<p>(a) 8G</p> <p>The Clean Air Discount, which will be withdrawn in December 2025, is provided by Transport for London rather than Westminster City Council.</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>'folded'. The costs I'm tied into are astronomical compared to a petrol car, which offered extremely cheap rates.</p> <p>(b) Living in Westminster a resident doesn't typically have a forecourt in order to charge a car with household rates for electricity. So an electric car is not actually as much of a worthy reduction in cost to run as is touted.</p> <p>Being able to drive into London congestion free, but not being able to park renders the congestion free inducement fairly impotent to me which renders the electric element essentially useless and a weight around my neck. I feel abused by your practises in this situation. le You really cant reasonably induce people to invest in changing their habits away from public transport and then hold them accountable for doing so with insufficient warning.</p> <p>Of course the 'perks' need to come to an end at some time but I have been mislead into believing the Dec 2025 end date. And that is not an accident which brings me to the most important point. The trust and the reputation on which society is predicated is once again destroyed when governing bodies mislead by omission or change policy with no reasonable warning.</p> <p>You need to understand that your role above all is to maintain trust in the people you are tasked to manage. When trust is eroded, government's word becomes meaningless, and that is when you tread a very dangerous path (that has already begun)</p>	<p>(b) 6A, 7E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>where people stop being complaint and you stop being able to affect change positively.</p> <p>(c) You should honour the current prices until the end of December 2025 or continue in the same vein and offer a better sliding scale of price reductions that the ones being suggested (even if they are 'better' than Chelsea's prices. Ie this isn't about comparing prices to Chelsea since Chelsea never induced its residents to buy/lease electric cars using a 10 minute parking rate).</p>	(c) 5F
140.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 1st February 2024</p>	<p>I am writing to object to the Tariff and Permit Pricing Restructure, currently under consideration by Westminster Council.</p> <p>My objection is on the following grounds: by increasing parking charges for Electric Vehicles (EVs), the Council penalises emissions-free vehicles and the drivers of emissions-free vehicles, which is counter to Westminster Council's stated goal of the improvement of air quality in the borough.</p> <p>Any increase to parking charges for emissions-free vehicles is counterproductive to, and therefore also in opposition to, any environmental goal pursued by the council.</p>	7A
141.	<p>[REDACTED]</p> <p>[REDACTED]</p>	<p>My observations on the proposed charging structure are as follows:</p> <p>(a) My vehicle is ULEZ compliant so I should not</p>	(a) 7I

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>Email dated 1st February 2024</p>	<p>be penalised on an emissions basis. If Westminster's proposal is carried, then I would have to pay £214 (well in excess of what I paid last year.)</p> <p>(b) I use my vehicle for short journeys, (mostly outside Westminster) so even if you were to calculate my vehicle's emissions in Westminster, the calculation would be so low as to be almost negligible. Basing the charge on emissions is disproportionate and unfair. One size does not fit all.</p> <p>(c) The rise in price is regressive and brutal for those like me who are retired pensioners with health issues. Pensioners are on a fixed income and are not in a position, like employed individuals, to trade in their petrol cars for electric models. By raising the price of residents permits, Westminster's proposal is punitive, increasing the already high cost of living.</p> <p>Single pensioners, owing one vehicle and living alone, ought to be granted a reduction in tariff given that such persons are entitled to 25% reduction in Council tax.</p> <p>(d) I reside in [REDACTED] where, even now, on a daily basis it is difficult to source a residents parking space. Parking restrictions in this area are very lax. They are from Monday to Friday only. At weekends, it is almost impossible to identify a resident's parking bay because of the proliferation</p>	<p>(b) 7C</p> <p>(c) 3C, 3E</p> <p>(d) 10C</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>of non-permit holders occupying residents parking bays. The Council must extend the restrictions from Monday to Saturday 1.30pm (at the very least, like the [REDACTED] area). Restrictions in Chelsea are from Monday to Saturday (in some sectors to 6.30pm). Is there any reason why Westminster cannot take a leaf out of Chelsea's book?</p> <p>(e) Furthermore, there are many roads in Westminster where speed is restricted to 20mph, a restriction that is seldom observed. Westminster would do better arming the roads with CCTV to capture details of non-observant vehicles and to fine drivers for exceeding the speed limit. Westminster would recoup a great deal of money that way. It is fatuous and pointless to lay down a speed restriction if it is not enforced. In other words, the law is an ass. For instance there is a speed limit of 20mph in [REDACTED] yet I have witnessed on repeated occasions cars flying by at more than twice that speed and motorbikes speeding even more excessively.</p> <p>(f) Westminster Council ought to charge motorbikes for parking in Westminster. Moreover, many motorbikers park their bikes in residents parking bays rendering them un-usable by resident permit vehicle owners who pay a high price for the privilege of parking. Westminster has failed to do anything about this.</p>	<p>(e) The implementation of fixed CCTV sites for traffic enforcement has a significant implementation and upkeep cost. In general, the City Council would consider alternative means for encouraging vehicles to slow down and only use camera enforcement where there remain notable concerns and no other solutions.</p> <p>(f) Motorcycles pay £1 per day to use solo motorcycle bays and pay the current pay-to-park charge for pay-by-phone parking that applies in each Zone. Resident motorcyclists are also able to purchase residents' permits for an annual charge of £57. Please note that the charges for pay-to-park and residents' permits for motorcycles would increase under the emissions-based charging proposals.</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
142.	<p>██████████ ████████████████████ Email dated 1st February 2024</p>	<p>I am moved to write to you, as I understand there is a consultation regarding electric vehicle parking.</p> <p>Although I am not a regular user of this facility, I am occasionally a visitor to central London both for shopping and for hospital appointments.</p> <p>(a) I bought my electric car because I knew that Westminster were offering this concession and now feel vulnerable and cheated.</p> <p>(b) This is a further erosion of trust in public facilities. I am deeply distressed that the congestion and emission charges are simply there to hike income and have nothing to do with either emission or traffic.</p> <p>I call upon those who are listening to continue to allow the concession or to offer a new and different concession to electric car drivers, so as to encourage the growing use of electric vehicles. Simply wiping away the concession and its totality is unfair, greedy and wrong.</p>	<p>(a) 7E</p> <p>(b) 8A</p>
143.	<p>██████████ ████████████████████ ██████████ Email dated 1st February 2024</p>	<p>I am writing about your proposals to change resident's parking charges in Westminster.</p> <p>(a) The proposals are muddled: CO2 is not a pollutant, it constitutes about 0.04% of the atmosphere and is essential for all plant life on earth. Plants die when it is below about 0.019% of the atmosphere and the increase in atmospheric CO2 content in recent decades has resulted in an</p>	<p>(a) 11A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>increase in the “green” coverage of the earth by about 20%. See attached article by Prof William Happer from Princeton, and look for numerous articles by him, Prof Richard Lindzen from MIT, or Prof Steven Koonin from NYU. There is a huge and unpublicised body of literature attacking the validity of the CO2 hypotheses promoted by climate alarmists. ██████████ submitted a document in support of this position which can be viewed at https://www.thegwpf.org/images/stories/gwpf-reports/happer-the_truth_about_greenhouse_gases.pdf].</p> <p>(b) The alleged future social cost of increasing CO2 in the atmosphere resulting in global warming will not be addressed practically by this measure – the UK has reduced its CO2 output in recent decades, but the amount of this reduction has been massively exceeded by increased CO2 output from the rest of the world. Your proposed measures will have no material impact on global atmospheric CO2 concentration.</p> <p>(c) Nitrous oxides and particulates emitted by cars are pollutants of the atmosphere, so if it were considered legitimate for Westminster Council to reduce pollution by these through taxing parking according to vehicle’s emissions of these pollutants, that would make sense. However, residents of Westminster who pay for parking permits only constitute a small proportion of the vehicles polluting Westminster’s atmosphere. Using the Congestion Charge or ULEZ system to price</p>	<p>(b) 10A</p> <p>(c) 11A, 7B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		polluting vehicles actually being driven in Westminster would make much more sense. Many cities require city centre delivery vehicles, buses and refuse collection vehicles (for which you are responsible) to be electric – why not look at these suggestions if you genuinely want to reduce real atmospheric pollution in the City of Westminster?	
144.	<p>██████████ Resident</p> <p>████████████████████ ██████████</p> <p>Email dated 1st February 2024</p>	<p>I am a resident in Westminster and I am writing about the proposed changes to resident parking permits and the pay to park fee across Westminster.</p> <p>I think the removal to the concessions for EVs will be detrimental to the quality of life in our borough, as it will discourage commuters to use EV instead of more polluting transport methods.</p> <p>I strongly object to these changes.</p>	7A
145.	<p>██████████ Resident</p> <p>████████████████████</p> <p>Email dated 1st February 2024</p>	<p>Objection to proposed changes</p> <p>I refer to the Council's proposed change to charges for both casual parking and residents' parking permits in the Westminster area, with effect from 1 April 2024.</p> <p>As somebody who lives in the area, whose children go to school in the area, and somebody who often parks in the area in pay and display bays, I hereby lodge my firm objection to the proposed charges for the following reasons:-</p>	7A, 7D

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>The current system actually helps with the problem you outline in the notice, namely pollution. Electric and/or Hybrid Vehicles have low or zero emissions, so why should the Council want to charge them more than now for parking in the Westminster area; or for their parking permits. Their charges should remain the same, as then this will promote more people switching to EVs or Hybrid vehicles, which in turn will decrease pollution. Therefore, it seems perverse and counterproductive to increase charges on any EV and/or Hybrid vehicles, be that parking permits or pay and display parking.</p>	
146.	<p>██████████ Resident ████████████████████ Email dated 1st February 2024</p>	<p>Regarding the consultation in scrapping the electric parking 10 minute rule.</p> <p>I believe it is a terrible idea because:</p> <p>(a) That is 1 of the 3 main attractions of switching to electric in general to people contemplating switching from a combustion engine to electric</p> <ul style="list-style-type: none"> - You should be encouraging a switch to electric to get to reduce pollution and carbon footprints - If there is no benefit of parking, there is no real added incentive to switch to electric - I switched to full electric 7 years ago – For me it was in the top 2 reasons to switch <p>(b) You are either focussed on reducing a carbon footprint or you want to raise money – This looks like you are trying to pull the wool over people's eyes and have your cake and eat it!! If you promote</p>	<p>(a) 7D</p> <p>(b) 8A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>yourself as being green then do not change policies which encourage a transition to a vehicle with lower emissions. People can see through this.</p> <ul style="list-style-type: none"> - I have copied in a few others who have taken a similar view to me and who can also raise their objections for the consultation – It is a TERRIBLE idea to change the current parking scheme for electric vehicles in Westminster. - The only benefit of the change would be raising revenue - everything else is impacted negatively. 	
	<p>Email dated 1st February sent to WCC Customer Relations</p>	<p>Your response is completely unsatisfactory.</p> <p>(c) Your policy on YOUR WEBSITE mentioned the ridiculous idea of moving the goal posts for electric vehicles. This consultation is the biggest own goal for trying to promote net zero by now trying to propose charging electric vehicles the same as normal vehicles.</p> <p>(d) Your website was totally unclear and said from January the policy will change. https://www.westminsterlabour.org.uk/issues/2023/12/09/parking-charges-for-electric-vehicles-in-westminster-will-remain-the-lowest-in-inner-london/</p> <p>This is totally unfair. You should see this as misleading and refund me the full parking charges that I paid in good faith by following your guidance on the Labour Westminster page. You should also alter the app so that electric vehicles cannot pay more than 10 minutes or else problems like this will</p>	<p>(c) 7D</p> <p>(d) The City Council is not responsible for the contents of the Westminster Labour's web site as this comes under the purview of that political party rather than the local authority. The latest information on the emissions-based charging proposals can be found on the City Council's website at https://www.westminster.gov.uk/parking/changes-how-we-charge-parking.</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>arise more and more due to your misleading communication.</p> <p>(e) And regarding your consultation, my feedback as an electric vehicle owner is that this potential policy change is totally ridiculous and doesn't promote green energy. If anything, you will promote more people to abandon the idea of buying electric vehicles. You may be green on paper but your policies are saying the total opposite to the public. If you want to retain your seats, you should consider continuing implementing policies that have seen a reduction in CO2 emissions by promoting the switch...Not deterring it.</p> <p>I have copied in a few councillors. Please ensure that my response and feedback to the consultation gets into the right hands.</p>	<p>(e) 7D</p>
147.	<p>██████████ Resident ██████████ Email dated 1st February 2024</p>	<p>As the holder of a Resident's Parking Permit, I am writing to object to the proposed changes to the Resident Permit Charge proposed by Westminster City Council.</p> <p>The very first reason given for the imposition/increase in these charges is this: (a) To reduce air pollution in Westminster as part of Westminster City Council's ambitions to meet its net zero emissions by 2040. The proposals align with the Fairer Westminster Strategy and complement a number of our environmental policies and commitments. The improvement of air</p>	<p>(a) 7A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>quality is an important priority for the council and these policies support this aspiration. Yet the first two categories of vehicle which will be subject to charges of £40 and £80 respectively, are for electric vehicles with zero CO2 emission.</p> <p>If the intention is that 'vehicles are charged in accordance with the level of emissions they produce' as stated as a reason for the Council's proposals, how do these electric vehicles affect air quality and work contrary to the Council's net zero emissions target?</p> <p>If the proposals are, as stated, 'to accommodate the growing number of electric vehicles and the different range of hybrid vehicles', this has nothing to do with the net zero target but is simply a tax on the use of these vehicles. Those of us who choose for environmental reasons to use electric or hybrid vehicles are now being penalised for our good citizenship.</p> <p>(c) These proposed charges do not, as is claimed, 'use banded charges based upon vehicles's individual tailpipe emission levels of Carbon Dioxide (CO2).' If there is no tailpipe emission, as shown for Band 1A and Band 1B on your table, there should be no charge.</p> <p>Either the reason for these proposed charges should be rethought or their implementation reconsidered. As it is, the reasoning is contradictory and the thinking behind it disingenuous.</p>	<p>(b) 8A</p> <p>(c) 7A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
148.	<p>██████████ Resident ████████████████████ Email dated 1st February 2024</p>	<p>To whom this may concern these new parking charges are another attack on motorists this has nothing to do with pollution!! After the introducing the ULEZ charge has gotten rid of most of the high polluted vehicles in the area city of Westminster is one of the wealthiest boroughs in the UK, and yet they seem to be penny pinching the poor! This is not right or fair so wrong especially in today's economical climate I hope and pray these unfair prices do not happen!!</p>	<p>11D, 3A, 3E</p>
149.	<p>██████████ Resident ████████████████████ Email dated 1st February 2024</p>	<p>(a) I am a ██████████ resident in Kensington and Chelsea but frequently using Ringo to park throughout Westminster at various clients homes. Recently a very helpful parking warden told me that I would only be paying for the first 10 mins of parking as my vehicle is hybrid.</p> <p>This is clearly incorrect as I parked in Pimlico today for 4 hours and paid £17.28! That's a huge difference. I think parking is outrageously expensive and I can't see the benefit of having a low emission vehicle at all. Furthermore, I had to dispute a ticket late last year as non-residents don't get to utilise the charging lampposts with associated marked parking bay. Today I managed to park on a metre bay but connect to the lamppost by making sure I sat directly on the line.</p> <p>(b) Surely these prices need addressing they penalise small business owners like myself heavily what if my client gets someone local? I'd be out of</p>	<p>(a) Electric and plug-in hybrid electric vehicles currently receive a concession whereby they can pay for just 10 minutes in Westminster's on-street pay-to-park bays and park for up to the maximum prescribed period. If a vehicle owner believes they have been incorrectly charged, they should raise this with the service provider in the first instance.</p> <p>See also 6A.</p> <p>(b) 12A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		business!	
150.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 1st February 2024</p>	<p>(a) I object the introduction of emission based banding of parking permits in the City of Westminster. I already pay ULEZ of £12 per day if I want to move my car in Westminster. I agree with the ULEZ charge as it is usage based and therefore directly linked to the emissions caused by me driving the car in Westminster.</p> <p>(b) However, a parking charge by definition applies to a car that is stationary and therefore not causing any emissions. I object the concept of charging car owners twice: when they are moving the car as well as when they are not moving the car. This to me seems a mechanism to generate more income for the council rather than a scheme to improve the air quality in the City of Westminster.</p>	<p>(a) 7B</p> <p>(b) 7B, 8A</p>
151.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 1st February 2024</p>	<p>I hope this letter finds you well. I am writing to formally express my objection to the proposal for emissions-based charging, as outlined in the document titled "Tariff and Permit Pricing Restructure (Emissions-Based Charging) – Notice of Proposals". While I acknowledge the City of Westminster's commitment to reducing carbon emissions and improving air quality, I believe that the proposed taxation on electric vehicles is fundamentally flawed and counterproductive to the overarching goal of reducing pollution levels. It is undeniable that the City of Westminster faces severe challenges in terms of carbon emissions and air quality, and I appreciate the council's efforts</p>	7A, 7D

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>to address these issues. However, the proposal to introduce emissions-based charging, particularly the taxation on electric vehicles, is, in my view, absurd and counterintuitive to the primary objective of reducing pollution levels.</p> <p>Electric vehicles (EVs) are widely recognized as a sustainable and environmentally friendly mode of transportation. They produce zero tailpipe emissions, significantly contributing to cleaner air and reduced carbon footprints. By taxing electric cars based on their emissions, the proposal not only disincentivizes the adoption of eco-friendly vehicles but also sends a mixed message to residents and visitors.</p> <p>The taxation on electric cars contradicts the broader global trend of promoting electric mobility to combat climate change and air pollution. Governments and municipalities worldwide are actively encouraging the transition to electric vehicles through incentives, subsidies, and supportive policies. It is perplexing that the City of Westminster is contemplating a policy that hinders the adoption of electric vehicles, which should be a pivotal component of any strategy to reduce emissions.</p> <p>I strongly urge the City of Westminster Council to reconsider the approach outlined in the proposal and explore alternative methods to incentivize cleaner, less-polluting vehicles. Such alternatives should prioritize promoting electric vehicles and</p>	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>other low-emission modes of transportation, rather than imposing additional financial burdens on those who choose to embrace environmentally responsible means of travel.</p> <p>In conclusion, while I share the council's concern for air quality and environmental conservation, I respectfully object to the emissions-based charging proposal, especially the taxation on electric vehicles. I implore you to revisit this aspect of the proposal and align Westminster's policies with global efforts to combat pollution and climate change.</p> <p>Thank you for your attention to this matter. I look forward to a reconsideration of the proposal that truly supports the transition to cleaner and more sustainable transportation options.</p>	
152.	<p>██████████ ██████████ Email dated 2nd February 2024</p>	<p>I am writing to express my vehement opposition to the proposed consultation on scrapping the electric parking 10-minute rule. This decision, in my view, is highly ill-advised for the following reasons:</p> <p>(a) Undermining a Key Attraction: The 10-minute rule is one of the primary attractions for individuals contemplating the switch from combustion engines to electric vehicles. Eliminating this benefit jeopardizes a significant incentive for adopting electric transportation.</p> <p>Discouraging Electric Adoption: Encouraging the transition to electric vehicles is crucial for reducing</p>	(a) 7D

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>pollution and carbon footprints. By removing parking benefits, you undermine the overall appeal of making the switch.</p> <p>Lack of Incentive: Without the added benefit of convenient parking, the genuine incentive to switch to electric vehicles diminishes significantly.</p> <p>Personal Experience: Having switched to a full electric vehicle several years ago, I can attest that the parking advantage was among the top two reasons influencing my decision.</p> <p>(b) Inconsistency in Green Practices: The proposed change appears contradictory to any commitment to reducing carbon footprints. If the objective is environmental consciousness, altering policies that encourage low-emission vehicle adoption sends a conflicting message.</p> <p>(c) Community Opposition: I have included others who share a similar perspective and can voice their objections during the consultation. The consensus is clear: altering the current parking scheme for electric vehicles in Westminster is a detrimental idea.</p> <p>(d) Revenue vs. Overall Impact: It seems the sole benefit of this change is revenue generation, while the negative impact on other aspects is substantial and far-reaching.</p> <p>I urge you to reconsider this proposal and take into</p>	<p>(b) 7A</p> <p>(c) 8H</p> <p>(d) 8A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		account the long-term consequences it may have on both environmental initiatives and public perception.	
153.	<p>██████████ ██████████ Email dated 2nd February 2024</p>	<p>I am writing to inform you I disagree with the permit price tariff changes. It is unfair to price parking permits based on emissions when road tax already does that.</p> <p>This is just completely unreasonable. I walk whenever I can, and care for reducing pollution, but this is not fair on people that rely on their vehicles for getting around.</p> <p>I urge this to be reviewed again and listen to your residents.</p>	7L
154.	<p>██████████ ██████████ Email dated 2nd February 2024</p>	<p>I write in response to the consultation on residents' parking charges.</p> <p>(a) Parked cars do not release emissions: It seems to have escaped the Council's attention that parked cars of any sort do not release any emissions, regardless of their power source. Charging for parking based on emissions that do not occur during the parking period, and calling that environmentally friendly, is utter nonsense. It is green-washing and deceptive.</p> <p>(b) It's all about money: So why is the Council making this change? Obviously, to raise more money. You call the new charge a "fairer and more proportionate charging</p>	<p>(a) 7B</p> <p>(b) 8A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>structure so vehicles are charged in accordance with the level of emissions they produce". That's nonsense, as evidenced by introducing charges for zero-emission vehicles. How is that charging in proportion to emissions? This is simply a revenue grab, imposing more costs on motorists. At the same time, bus and train services are cut back and the fares increased, making all forms of transport around London more difficult and expensive.</p> <p>(c) The Me Too movement: You also justify the change by saying that some other Councils in London do this. To do something simply because someone else does it, is not a sufficient justification. If other Councils implement stupid and nonsensical policies, it is not incumbent on WCC to slavishly follow them.</p> <p>(d) It is ridiculous that we have to pay for a permit to park outside our own homes in the first place. This just makes it more ridiculous.</p> <p>(e) Motorists already pay road tax, fuel duty, VAT on fuel, IPT on their insurance premiums, congestion charges and ULEZ charges. This is another tax with no justification. I am absolutely opposed to any further costs being imposed on motorists by the Council.</p>	<p>(c) 0A</p> <p>(d) 8B</p> <p>(e) 7L</p>
155.	<p>██████████</p> <p>████████████████████</p>	<p>I am writing in following many concerning and confusing messages regarding the scrapping of the electric parking 10 minute rule.</p>	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	Email dated 2 nd February 2024	<p>(a) There are huge concerns from many within the community, who are extremely angered at the implications for this potential change, which will be harmful for many reasons...</p> <p>The impact on individuals electing not to drive with their electric vehicles due to this potential change – will have a huge impact commercially on businesses (less people in the area will reduce spend drastically, at a time when the economy and many businesses are struggling)</p> <p>(b) Many have purchased electric cars (at a great expense still) with the added benefit of cost-effective parking. This is being taken away, which not only seems like a revenue opportunity scheme for the council, but goes totally against promoting a greener economy. Are you not meant to be reducing pollution and carbon footprints?</p> <p>I purchased an electric car a few years back for all the right reasons (pollution in general, pollution in London specifically and the benefits brought in by Westminster like parking) – yet this is all being disregarded.</p> <p>(c) Many will now not opt to not purchase electric vehicles, purely based on this suggested change. This has a huge knock on effect on businesses, let alone the general public.</p> <p>I could go on highlighting the impact of the above points in greater detail, but I feel they are so</p>	<p>(a) 12A</p> <p>(b) 7E, 8A</p> <p>(c) 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>obvious to all.</p> <p>I am sure this is one of many messages you must be receiving, so hope to see a positive response by scrapping what is a pure revenue generating scheme.</p>	
156.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 2nd February 2024</p>	<p>I wish to register my objections to the proposed changes.</p> <p>Necessary background: I have held a Westminster Resident's Parking Permit for over 20 years, residing at the same address in central Westminster. I am subject to Congestion Charging - at a Resident's Discounted Rate - on a Pay as You Go basis. I drive a vehicle that is subject to the Mayor of London's ULEZ charge every time I drive it. (For the avoidance of doubt and for the sake of transparency, I oppose that Tax but not because of its underlying ecological principles.)</p> <p>Objections in Detail:</p> <p>(a) Until such time as legislation prohibits the use of certain classes of vehicle, an individual has the right to use the vehicle of his/her/their choice. Persuasion - in the case of the proposed charge, through deterrence - falls disproportionately and inequitably on Residents more than inward-travellers.</p> <p>(b) The basis for the charge is to improve air quality. This has the same purpose as the ULEZ</p>	<p>(a) 3C</p> <p>(b) 7L, 8A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>charge (a virtual tax). A Resident's already ULEZ-liable vehicle in motion in the zone, which will also be subject to the proposed Council charge, will be paying twice as a "penalty" for a single activity. The air quality is in no way improved by the double payment. This is a double jeopardy charge/tax and as such is wholly inequitable and may be of questionable legality.</p> <p>Such duplicated payment, doing nothing of itself further to improve air quality, is therefore simply a disguised revenue supplement imposed on Residents.</p> <p>(c) The technical basis chosen for the charge bands is a generalised DVLA statistic and only based on vehicle tail-pipe (CO2) emissions. To have any justification the basis for the charge must be based on actual damage (Particulates). Such figures are also readily obtainable - e.g. MOT Test Results. This would also make the banding brackets coherent rather than the present broad-brush one.</p> <p>(d) It is also incomprehensible to see on what basis a charge for electric vehicles can be levied - unless it be an undeclared means to cover the cost of creating sufficient electric charge-points.</p> <p>(e) Emissions only occur when a vehicle is in motion. A Resident's vehicle will be static, parked with engine off for the majority of any 24 hour period. The charge basis is for 24/7 usage</p>	<p>(c) 11A</p> <p>(c) 7A, 8F</p> <p>(e) 7B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>assuming emissions that are not happening. The charging basis as envisaged is therefore not only inequitable / discriminatory but also illogical. Should the proposed charge, however ultimately modified it is, be introduced Residents should be charged on a discounted basis - either as with the Congestion Charge PAYG scheme or on an actual usage basis as the current ULEZ scheme does.</p> <p>(f) The present ResPark conditions allow a Resident to register two vehicles to the same address but to park only one at any time. The proposed change to the charging basis, applying it 24/7 to each registered vehicle, is charging for a vehicle that isn't present and is therefore not only inequitable and discriminatory but possibly may also be an illegal basis for charging.</p> <p>(g) The introduction date for the proposed charge takes no account of the fact that Residents have already paid an Annual charge. No allowance has been given for the unexpired portion of Annual Charges to be set against the initial new charge.</p> <p>(h) In sum, the changes to the proposed charging basis are fundamentally discriminatory - and therefore undemocratic. Illogical in concept at several points and therefore indefensible, they are, as they stand, duplicative and amount to no more than "virtue-signalling". They are instead an undeclared but nonetheless blatant means of increasing Council revenue with no measurable</p>	<p>(f) The argument that a non-present vehicle should not have to pay for a permit would require complex administration to only charge for when it is used or to refund for trips where the vehicle is parked outside of its associated Zone. Residents and other permit holders who are required to pay for a permit should weigh up the overall benefit of purchasing a residents' permit based on how often they would gain value from it.</p> <p>(g) The introduction date would only apply to residents who are choosing to renew their permit when it is due to expire.</p> <p>(h) The proposed charges affect vehicle owners based on how often they use on-street parking within Westminster. 8B, 7L, 8A, 0A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>beneficial outcome for the payer - or the environment that is the pretended beneficiary. They are also technically incoherent on a number of significant points.</p> <p>I am copying this reply to our MP and to our Ward Councillors.</p>	(e) 8A
157.	<p>██████████ ████████████████████ Email dated 2nd February 2024</p>	<p>I disagree with the proposed changing costs on the following grounds.</p> <p>(a) You are conflating emissions from use with the rental of real estate. Many residents, especially those with larger cars, use their cars very infrequently, often far less than owners of smaller cars used daily to get to work, etc. Indeed, in my own case, I park in Westminster for perhaps three months of the year, but only use the car half a dozen times within that period. And because I live ██████████ I would be very surprised if I drive more than 20 miles a year in Westminster. I do not accept this justifies doubling the cost of my parking permit. I recognise that I am an extreme example, but I am not alone.</p> <p>(b) The scale is all wrong. The majority of pre-2001 cars of more than 1200cc create far more polluting emissions than my newish car of slightly over 256g/km. Furthermore, there is no premium on diesels, which are certainly more polluting. Your scale of proposed fees seems to me to be almost entirely focused on emissions: it is self-evident that you are charging no more than £40 for the cost of a</p>	<p>(a) 71</p> <p>(b) 5E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>parking space and the rest of the charge represents a tax on the type of car. This distorts the market for parking permits.</p> <p>(c) The scheme will not work because nobody will say “oh, parking permit costs are going up in two months’ time, so I will sell my car and buy an electric one”. The economics do not justify it. As a council, you should be nudging people into clean car use, not penalising people.</p> <p>(d) Your policy is too narrow. I have considered the pros and cons of disposing of my car and replacing it with an electric one. The advice I have received is that because I use the car for less than 5,000 miles a year, it is better for the environment to wait until the car is someone older, because the CO2 omissions of building a new car, an electrical one or otherwise, far exceed the CO2 omissions of driving my car for the next five years. You are therefore promoting a policy which is actually bad for the environment.</p> <p>In conclusion, while I have no difficulty with discounting for electric cars or charging a premium for cars with higher CO2 omissions when usage can be considered, such as with the congestion charge, I think applying this approach to parking permit costs is too blunt an instrument.</p> <p>(e) Furthermore, and in any event, if this policy is to be equitable, there should be a much greater notice period – three years? – so that people can</p>	<p>(c) 7D</p> <p>(d) 9A</p> <p>(e) 5F</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		make informed decisions as to the true costs of replacing the car with an electric one.	
158.	<p>[REDACTED]</p> <p>Letter dated 28th January 2024</p>	<p>I have received your email explaining that you intend radically to increase the cost of parking at our residence in Pimlico. The message is rendered even more irritating by the hypocrisy with which this extra tax is justified.</p> <p>I deeply resent this dis-honest tax increase and will always do my very best to make sure Westminster is not manager by cheats and liars.</p>	3C
159.	<p>[REDACTED] Resident</p> <p>[REDACTED]</p> <p>Email dated 2nd February 2024</p>	<p>As a resident who pays council tax I think the increases are unreasonable. Parking in my area is open to anyone from 6.30 pm and on weekends. With the proximity to [REDACTED] we are unable to park on [REDACTED] as there are no restrictions. In addition, the road I live in allows C permit holders to park so additional spaces are used.</p> <p>Unfair to pay for parking when there is no parking and often have to walk in the dark after finding a space not close to my home.</p>	<p>3C</p> <p>The residents' parking scheme does not guarantee a parking space or that an available parking will be close to a resident's home address. This information is provided to permit holders in the terms and conditions when applying for a permit.</p>
160.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 2nd February 2024</p>	<p>I am horrified at the proposal to make all cars pay for residents parking at this very difficult time of much hardship. Sadly I believe it to be yet another ploy to increase the Mayor's coffers - as I know many, many people will think - as they have done over the ULEZ expansion.</p>	<p>3E, 8A – WSP replied to [REDACTED] on 12th February 2024 to clarify that the proposals have been put forward by Westminster City Council and the revenue from parking charges is held within the Council's Parking Places Reserve Account (PPRA) rather than by Transport for London. The City Council is bound by legislation to re-invest any</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>Are Blue/White badge holders exempt?</p>	<p>surplus made from parking services in prescribed transport related activities only. In 2022/23 for example, the four main areas of funding were highways and transportation improvements / maintenance, environmental improvements and street cleansing, concessionary fares, and Home to School transport.</p> <p>I can confirm that Blue Badge holders would be subject to the new charges for pay-to-park bays. However, they would continue to receive an additional hour's free parking after payment of the charge.</p> <p>White Badge holders do not have to pay to use residents' parking spaces or pay-to-park bays when displaying their White Badge and this remains unchanged under the emissions-based charging proposals.</p>
161.	<p>██████████ Resident ████████████████████ Emails dated 2nd and 10th February 2024</p>	<p>I am writing to express my absolute disgust at the treatment the council are giving us drivers/owners of electric vehicles.</p> <p>(a) It's not enough that there are hardly any charging points in my area ██████████, the ones we have are not accessible as they are always obstructed by non electric vehicles (Rodmarton St has 3 electric points and I have never seen an electric car plugged into them) btw, I allowed for an electric charging specific space in Dorset Street but you continue to put up more bike racks that no one uses) but now you want to charge residents up to</p>	<p>(a) 6A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>£80 to park in our own area.</p> <p>(b) You state the proposals are to lower emissions so why is this so? We pay a lot more for an electric car so the good of the air we breathe, we live here and are doing our bit but being punished by our council, why are you doing this? I know this email is probably going to end up in the bin as the council have already made up their minds. I'm sick of being punished for doing the right thing.</p> <p>Disgusted with this proposal.</p>	<p>(b) 7A, 8G</p>
162.	<p>██████████ ██████████ Email dated 2nd February 2024</p>	<p>I enthusiastically support your proposal to introduce emissions-based parking and permit charging within Westminster. It is long overdue. A minority of car owners /operators are giving the residents of Westminster the dubious pleasure of living among some of the highest carbon emissions and worst air quality in the UK (or anywhere). I expect that the number of car owners is a small fraction of Westminster residents, so it is unfair that they are allowed to cause a disproportionate share of environmental damage.</p> <p>It does not make sense to have the ULEZ scheme (which I support) yet allow heavily polluting cars and SUVs to be registered and park within Westminster at the same price as far less polluting vehicles. I suggest that the emissions-based tariff differentials start smart and then increase over time, with the expectation of rising pricing well</p>	2E

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>publicised. That will give owners of polluting cars time to adjust, should they wish to avoid increasing charges. It will also send an important signal, hopefully one that will be copied by local authorities across London and beyond.</p> <p>As you might have gathered, we do not have a car. We sometimes use ZipCars.</p>	
163.	<p>██████████ ██████████ ██████████ Email dated 2nd February 2024</p>	<p>I am writing about the proposed changes to the pay to park fee across Westminster.</p> <p>I work in ██████████ and travel there every weekday and spend much of my days walking around the borough supporting the local community. One of the best things about the borough is the lack of pollution from petrol and diesel vehicles and it is noticeable to see the amount of EVs that are there due to your favourable parking terms for these vehicles. It makes it so much more pleasant for residents, encourages visitors and helps those that work in the borough to support the local community more actively. I feel it was a very good idea to allow big concessions for EVs to pay to park in the borough as this encouraged a big take up of EVs and usage of EVs on daily commute instead of using other less sustainable transport methods across the borough.</p> <p>The removal of the parking concessions for EVs I think is a very bad idea. It is unclear how many users will keep using their EVs for commuting and</p>	7D

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>we may instead encourage more petrol and diesel vehicles to come back. We are also taking away incentives from people to move from ICE to EV cars which is critical for our fight against the climate crisis and apparently a strong priority of the government and this council in particular. I feel this decision must be revisited and reversed.</p> <p>For all these reasons I strongly object to the removal of concessions of EVs pay to park fees.</p>	
164.	<p>██████████ ██████████</p> <p>Email dated 2nd February 2024</p>	<p>I am writing to express my strong and profound objection to the proposed changes to parking in this area.</p> <p>(a) Recently, the ULEZ was expanded to cover my residence and a very hard and financially difficult decision to purchase an electric car was made, as I need to drive into Westminster for my work. Alongside the incredibly unreasonable insurance prices I have committed a great deal of expense to comply with London and Westminster's increasingly draconian fees and policies. The one benefit of this was that I could at least park for a reasonable price as part of this scheme.</p> <p>(b) Now, I am faced with paying an incredibly high price to park for my 10-12 hour work days in Westminster as the current electric car parking incentive is being withdrawn. This will make it almost impossible for me to perform my job without further crippling my and my young families financial future and I may need to consider no longer</p>	<p>(a) 7E</p> <p>(b) 3D, 12B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>working in the area.</p> <p>(c) I urge the review board to amend these schemes to keep electric vehicles free from these charges, the whole point of a scheme to reduce emissions in an area is to incentivise cleaner vehicle use, why can't charges simply be increased for IEC vehicles instead? Rather than prove that Westminster actually cares about emissions and air quality, this proposal shows it's true aim... To make more money.</p>	<p>(c) 7A, 8A</p>
165.	<p>██████████ Resident ████████████████████ Email dated 2nd February 2024</p>	<p>(a) This outrageous Price increase for resident parking permits has nothing to do with emissions, which need to be based on actual usage. My car is stationary for most of the time. Why should a resident, who already pays congestion charge every time he/she drives their car, be made to pay based on Engine size?</p> <p>(b) What is worse, the resident parking spaces on my street (██████████), in fact within a five minute walk in every direction, are mostly suspended due to one utility or construction company or another paying to do this. The council has absolutely no joined up planning with reference to broadband fibre installation, as the same road/pavement is dug up for the very same purpose on a monthly if not weekly basis. I have such trouble parking near my flat, that I have been seriously considering asking the council for a pro-rata refund of my parking fee for all the days my road is dug up. I will be keeping a record from now</p>	<p>(a) 7I, 7L</p> <p>(b) 10D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>on.</p> <p>(c) I would also like further information on how this “consultation” can be followed and where I can find responses to all comments raised by residents.</p>	<p>(c) 1B, WSP replied to [REDACTED] on 5th February 2024 to confirm that at the end of the consultation period, the City Council will begin compiling its report on the responses that have been received during the consultation period. This report will contain all the responses from residents and other stakeholders affected by the proposals. The format of the report has not been determined yet. The responses may be grouped / responded to by theme or on an individual basis to each respondent, or a combination of the two. Once a decision has been reached on whether to proceed or not with the proposals, copies of the report will be sent to everyone who has submitted an objection. Personal details will be redacted from the report.</p>
166.	<p>[REDACTED] Resident</p> <p>[REDACTED]</p> <p>Email dated 2nd February 2024</p>	<p>I am contraction regarding the proposal for Tariff and Permit Pricing Restructure,</p> <p>I am objecting to it as I feel it is unfair to penalise and tax fully electric vehicle while those do not emit CO2</p> <p>I am a resident of St James’s and feel that there should not be an increase in tariff for vehicle electric owner</p>	7A
167.	<p>[REDACTED]</p> <p>[REDACTED]</p>	<p>I write in support of WCC's proposal for the Tariff and Permit Pricing Restructure, reference 8056/P.</p>	2A

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	Email dated 3 rd February 2024	I fully support the intention to improve air quality by pricing for car parking, and I hope that the proposal is approved.	
168.	<p>██████████ ████████████████████</p> <p>Email dated 3rd February 2024</p>	<p>I am writing to object to the proposal to begin charging for electric vehicle resident parking permits.</p> <p>(a) The Council should be trying to encourage people to buy EVs to reduce emissions rather than increasing the cost of ownership for them (which already considerably exceeds the cost for petrol cars, particularly insurance). By adding to this you are just increasing the reasons for people not to make the switch to EVs.</p> <p>(b) Furthermore the proposal to have different charges according to battery size makes no sense. Zero emissions are zero emissions and there is no direct correlation between battery size and size of the vehicle.</p>	<p>(a) 7D</p> <p>(b) 11E</p>
169.	<p>██████████ ████████████████████</p> <p>Email dated 3rd February 2024</p>	<p>I am writing to comment on the review of the charging rates of Parking Permits. I wish object to the increases in parking charges on the following grounds:</p> <p>(a) The labour mayor has introduced an ultra low emissions charge for vehicles to include the whole city since August 2023. So those with non compliant vehicles are already paying an emissions related tax. So why double tax drivers for parking their vehicles as well as driving them? Also, if a</p>	<p>(a) 7L</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>vehicle is compliant with UŁĘŻ why penalise a driver further.</p> <p>(b) It is unclear what benefit to the citizens increasing the vehicle tax will bring. Under the conservatives Westminster was always a wealthy council, so it is unclear what this tax will do other than irritate the residents of Westminster who lack off street parking.</p> <p>(c) It is not possible to keep an electric car in Westminster due to the large number of rats that eat through vehicle electrics in the Pimlico area and nest in vehicles. The same issue affects hybrids and combustion engine vehicles, but damage to the electrical circuits in an electrical vehicle are more likely to result in an insurance write off. The council pest control have known about this for years and have failed to do anything about it.</p> <p>(d) If the council wishes to maintain its base of wealthier residents, unfair taxes will do nothing to achieve that. Instead those who are not pure investors are likely to move out from the borough.</p> <p>(e) Road fund licence is already emissions related for newer cars. Again the parking charges would be a double tax on residents.</p> <p>(f) Poorer people on the borough will suffer as older cars are likely to have larger engines. This would not result in a fairer Westminster.</p>	<p>(b) 8F</p> <p>(c) 10D</p> <p>(d) 3C</p> <p>(e) 7L</p> <p>(f) 3A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(g) Some people will be forced to sell their vehicle. When they bought them they did not know they were going to be hit with high local taxes. This is unfair.</p> <p>(h) Higher visitor parking charges will not be good for business in Westminster, as visitors go elsewhere. There is a similar scheme in Hammersmith, which has deterred me from parking there.</p> <p>In general all I want from a local council is clean streets. I do not need the opinions of others thrust upon me, additional taxes or anyone telling me how to think.</p>	<p>(g) 7E</p> <p>(h) 12A</p>
170.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 3rd February 2024</p>	<p>I am against this new proposal.</p> <p>(a) We are already charged when using the Congestion Charge area for the emissions.</p> <p>Proposing to charge again over the same issue is outrageous and won't fix the problem.</p> <p>(b) Instead of focusing on charging the residents of this area you should be more focused on eradicating the rise of the crime we are all suffering constantly.</p> <p>(c) Electric cars are not suitable for everyone and you should respect that opinion too. Until manufacturers do not stop 100% the production of petrol based vehicles you must understand that</p>	<p>(a) 7L</p> <p>(b) Concerns about crime should be submitted to the Metropolitan Police Service.</p> <p>(c) 3C</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>both options will dwell for many years more. Respect that too and do not overcharge residents with woke excuses.</p>	
171.	<p>██████████ Resident ████████████████████ Email dated 3rd February 2024</p>	<p>I am a Westminster resident and have a zone C parking permit. Our household has one electric car and one petrol car. The petrol car was about to be changed for an electric car which now will not be doing.</p> <p>I have the following comments:</p> <p>(a) Parking permit charges I recognise that as the number of electric vehicles rise permit charges need to be introduced to maintain revenue</p> <p>I criticise allowing individuals to part up to 3 cars SIMULTANEOUSLY. Resident road parking is a scarce resource and often there are not enough parking spaces available. Many residents of new properties are specifically not entitled to a permit, so why give existing residents the right to park 3 cars each? That looks like the council trying to increase revenue at the expense of modest parking users.</p> <p>(b) EV pay to park charges It often comes over that Westminster rarely looks after its own residents. It is reasonable as electric vehicles become more commonplace that parking charges go up for those cars to maintain revenue. The current charge is low</p>	<p>(a) 5B, 8A</p> <p>(b) 2D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>and is available for everyone.</p> <p>(c) Introducing the changes as soon as March 2024 is too soon. We have been encouraged to change to an electric car and overnight a key benefit is being withdrawn</p> <p>(d) I have never understood why non Westminster residents should benefit from such a good incentive. Increase the charge for non residents and maintain it for Westminster residents.</p> <p>(e) Increasing the parking cost of EV's coupled with an anticipated introduction of congestion charge next year will divert those EV drivers to other areas. Central London businesses already struggle with a much reduced footfall and this will affect businesses unduly</p>	<p>(c) 5F</p> <p>(d) 7I</p> <p>(e) 12A</p>
172.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 3rd February 2024</p>	<p>(a) The proposed new tariff for my car represents a 35% increase on the existing tariff. That would be a change massively more than the rate of inflation and, therefore, totally unwarranted.</p> <p>(b) A parking permit is, by definition, only granted to a resident of Westminster who owns a car. Each resident will have a particular need for a car for frequent, average or infrequent journeys by car. That pattern of road usage will not be influenced at all by increasing the charge for a parking permit. Cloaking this proposed increase in tariff as a mechanism to reduce air pollution is entirely fallacious and merely political chicanery.</p>	<p>(a) 3C</p> <p>(b) 3B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		(c) The proposed increase in tariff is nothing more than an increase in taxation falsely disguised as an environmental benefit.	(c) 8A
173.	<p>██████████ Resident</p> <p>████████████████████</p> <p>Email dated 3rd February 2024</p>	<p>(a) I got an email about the parking prices are changing and that the plan is already in place. I just wanted to know what the change will mean for my vehicle and how much I will have to pay?</p> <p>Is it going only off the CO2 emissions to work out the price?</p> <p>(b) It is all well and good trying to change the pollution. But what about the times of the parking I do not think is fair we pay for parking and most of the time cannot park because others are parking for free. Weekends are free parking for everyone</p>	<p>(a) 1B, WSP relied to ██████████ on 12th February 2024:</p> <p>Charges for pay-to-park bays and residents' permits will be based on:</p> <ol style="list-style-type: none"> 1. the vehicle's emissions level (and battery size if zero emissions); 2. the year the vehicle was first registered; 3. the type of fuel; and 4. the engine size (the latter is only relevant for older vehicles), and country of registration. <p>For vehicles registered in the UK, the above information should be available at https://vehicleenquiry.service.gov.uk/.</p> <p>I have attached the City Council's Notice of Proposals which sets out the proposed charges. If you are unsure how to interpret the tables in the notice, I should be able to provide some further guidance if you are happy to share your vehicle information.</p> <p>(b) 10C</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS									
		<p>which is also not fair.</p> <p>So why can't the hours be longer from Monday to Friday and extend it to weekends.</p>										
	<p>Email dated 12th February 2024</p>	<p>(c) Hi yh little stuck with how much mine will be I have a [REDACTED]</p>	<p>(c) WSP replied to [REDACTED] on 12th February 2024:</p> <p>From looking at the typical specifications available on the internet for your vehicle, it looks as if the CO2 emissions are around 114g/km. This would place your car in band 3 for residents' permits which would be £123.05 per year.</p> <p>To be certain, you would need to enter your car number plate at the following government web site to confirm the CO2 emissions that are recorded with the DVLA:</p> <p>https://vehicleenquiry.service.gov.uk/</p> <p>Once you have the CO2 emissions value for your car, you can look up the annual cost on the table below:</p> <table border="1" data-bbox="1406 1131 2087 1450"> <thead> <tr> <th>Band</th> <th>CO₂ emissions (g/km)</th> <th>Proposed charge (per year)</th> </tr> </thead> <tbody> <tr> <td>1A</td> <td>0, with a small battery (capacity 1 - 69 kwh)</td> <td>£40.00</td> </tr> <tr> <td>1B</td> <td>0, with a large battery (capacity 70+ kwh)</td> <td>£80.00</td> </tr> </tbody> </table>	Band	CO ₂ emissions (g/km)	Proposed charge (per year)	1A	0, with a small battery (capacity 1 - 69 kwh)	£40.00	1B	0, with a large battery (capacity 70+ kwh)	£80.00
Band	CO ₂ emissions (g/km)	Proposed charge (per year)										
1A	0, with a small battery (capacity 1 - 69 kwh)	£40.00										
1B	0, with a large battery (capacity 70+ kwh)	£80.00										

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS					
			2	1 – 90	£90.95			
			3	91 – 130	£123.05			
			4	131 – 150	£139.10			
			5	151 – 255	£214.00			
			6	256 or more	£321.00			
			<p>The pay-to-park charges for your vehicle, if you are just visiting Westminster (i.e. if you don't have a residents' permit), are set out in the table below:</p>					
			Band	1	2	3	4	5
			CO ₂ Emissions (g/km)	0	1 - 90	91 - 150	151 - 255	256 or more
			A Zone	£3.18	£3.64	£5.00	£5.46	£6.37
			B Zone	£2.58	£2.95	£4.05	£4.42	£5.16
			C Zone	£1.46	£1.67	£2.29	£2.50	£2.92
			D Zone	£2.13	£2.44	£3.35	£3.66	£4.27
			E Zone	£4.41	£5.04	£6.93	£7.56	£8.82
			F Zone	£4.62	£5.28	£7.26	£7.92	£9.24

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS				
			G Zone	£4.62	£5.28	£7.26	£7.92
174.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 4th February 2024</p>	<p>I wish to oppose the suggested changes to the residents parking permit charges in line with the CO2 output of the vehicle on the grounds below.</p> <p>(a) At present we pay many other taxes on our vehicles pollution and fuel consumption and I do not feel it is fair to add additional charges to the casual parking user or resident parking in Westminster.</p> <ul style="list-style-type: none"> • We pay Vehicle Excise Duty depending on the pollution category of our vehicle each year • We pay a Congestion Charge for using our vehicle in central London • In addition we may pay an Ultra-Low Emission Zone charge for using our vehicle in London • We pay a great deal of tax on the fuel bought for our vehicles again the more fuel used the more tax you pay. (Fuel duty is currently levied at a flat rate of 52.95p per litre for both petrol and diesel, while VAT at 20% is then charged on both the product price and the duty) <p>(b) Given these four substantial taxes are all designed to make us run more environmentally friendly vehicles I don't feel it is beholding on the</p>	<p>(a) 7L</p> <p>(b) 3E</p>				

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>City of Westminster to add to the high tax burden in the current cost of living crisis however laudable the intention may be.</p>	
175.	<p>██████████ Resident ██████████ Email dated 4th February 2024</p>	<p>I am writing to express my concerns and objection to the proposed increase in parking fees for vehicles with higher emissions, as outlined in the recent email from the City of Westminster addressed to Residents. I appreciate the opportunity for public consultation and would like to bring to your attention certain aspects that I believe need careful consideration.</p> <p>(a) Firstly, as a resident and vehicle owner, I find the proposed fee increase to be inherently unfair. When I purchased my vehicle, I had no prior information about potential future fee adjustments based on emissions. Implementing such charges retroactively seems unjust, especially for individuals who made their vehicle purchases without this knowledge. It raises questions about the fairness of imposing additional financial burdens on residents who were not informed of such considerations at the time of their purchase.</p> <p>(b) Secondly, there are currently other schemes in place within the City of Westminster, such as the Congestion Charge and the Ultra Low Emission Zone which seek to address the same challenges. By penalising those who already pay to drive their pre-existing vehicles within these areas, by now asking them to pay more as a deterrent to emissions, just to park, is unfair.</p>	<p>(a) 8C</p> <p>(b) 7L</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(c) Moreover, I am concerned about the potential environmental impact of encouraging the premature disposal or sale of existing vehicles. The proposed fee structure, if it is meant to deter the use of high emission vehicles, would inadvertently incentivize residents to part with their current vehicles, leading to increased production demand for new vehicles, contributing to additional carbon emissions. The same would not be the case if the proposed scheme only applied to the charges faced by new vehicle owners.</p> <p>(d) While I am supportive of initiatives aimed at reducing emissions and promoting environmental sustainability, I believe it is essential for the council to adopt measures that take into account the circumstances of existing residents. It is my sincere hope that the council recognises the schemes already in place to deter high emission vehicles, and aspects of fairness relating to unduly burdening those who were unaware of potential future charges when making their vehicle purchases.</p> <p>I appreciate the council's commitment to public consultation and value the opportunity to contribute to this process. I trust that my concerns will be taken into consideration, and I look forward to a fair and equitable resolution that balances environmental goals with the well-being of the community.</p>	<p>(c) 9A, 5H</p> <p>(d) 2E, 8C</p>
176.		Please, find below my objection and observations	11A

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>Resident</p> <p>████████████████████</p> <p>Email dated 4th February 2024</p>	<p>about the proposed permit pricing restructure.</p> <p>My objection is an intention to introduce a £50 diesel surcharge into the residents' parking permits for pre-2015 diesel vehicles to address the issue of the emission of Nitrogen Oxides (NOx). My concern for the surcharge is only about applying an arbitrary benchmark based upon the year of registration. The benchmark should obviously be a precise compliance with the ultra-low emission certificate (Euro 6 for diesel), rather than a year of registration. The thing is that diesel car manufacturers addressed the NoX and PM issues gradually, so some diesel cars complied with the ultra low emission certificate (Euro 6) already by the end of 2014, while others only by September 2015. If the new parking permit diesel surcharge is simply based on the 2015 as the year of registration, it will penalize the pre 2015 ultra-low emission diesel cars and will not introduce a surcharge for the polluting cars registered in 2015 but not complying with the ultra-low emission certificate (Euro 6). In other words, to incentivise the cleaner and less polluting vehicles (as stated in the objectives of the new parking scheme), the criteria should be a precise compliance with the ultra-low emission certificate, rather than an irrelevant year of registration. Moreover, the parking diesel surcharge for non-compliance with the Euro 6 certificate will be consistent with other existing charges and policies (for, example with the ULEZ policy), whereas the literal pre-2015 year of registration criteria will be a significant contradiction</p>	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		to the existing ULEZ and to the stated intention of the new parking scheme to incentivise cleaner and less polluting vehicles.	
177.	<p>██████████ Resident</p> <p>████████████████████</p> <p>Email dated 4th February 2024</p>	<p>Currently I have a full car permit and a ██████████ scooter that sits alongside using that permit. I paid £166 for this in December, and it expires December 24. When I renew, will the scooter still be on the car permit? It is a little unclear, as it looks as if one has two cars then two permits are required, but not sure about a scooter. Clearly I do not think I should have to pay for a second permit for just a scooter of less than 50cc. From the figures provided I could be paying up to £320 but I hope that is not the case.</p>	<p>1B, WSP replied to ██████████ on 12th February 2024:</p> <p>The City Council's proposals would require you to purchase a separate permit for your scooter when you renew as each vehicle would need its own residents' permit.</p> <p>The revised residents' permit charge for your car would be based on its emissions level (or engine size for older vehicles). The residents' permit for your scooter would then be £60.99 plus a £50 surcharge for a second residents' permit issued to the same individual.</p>
178.	<p>██████████</p> <p>██████████</p> <p>Email dated 4th February 2024</p>	<p>I wish to make a comment on this change. The email below, and the linked website, give 4 reasons for the changes. None of the reasons can possibly explain adding a charge for electric vehicles, or charging double for larger battery cars - increasing the costs for 100% electric vehicles will on the face of it increase emissions, reduce air quality, and reduce the charge dela between zero emission and other vehicles. There may well be perfectly sensible reasons for either one or the other policy (such as congestion or parking capacity), but it's simply not stated in the emails/website announcing the change. It seems likely to me that these goals contradict, i.e. having to charge EVs for parking because of capacity will work against goals for net</p>	<p>0A, 11E, 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		zero by 2040 - this analysis should be carried out carefully and shared.	
179.	<p>██████████ ██████████ Email dated 4th February 2024</p>	<p>I have a query regarding the new proposal for resident permit charges. The change is proposed to come into effect on 1st April 2024, what will happen to those with existing permits at this date? Will they be required to pay an additional amount on the 1st April to meet the new tariff for their car type? Or will they only have to pay the new tariff price when they come to renew their residents permit?</p> <p>I may have an objection depending on the answer to my query above.</p>	<p>1B, WSP replied to ██████████ on 12th February 2025 to clarify that existing residents' permits will remain valid until their expiry date and the proposed new charges would only be incurred at the point she chooses to renew her permit.</p>
180.	<p>██████████ ██████████ Email dated 4th February 2024</p>	<p>(a) Having read the email regarding the price restructure for residents parking, I find it totally contradictory. You say you are doing this to encourage the use of greener vehicles, yet you are proposing to charge for EV parking which is currently free! How is that encouraging?</p> <p>(b) What exactly does the council plan to do with the extra revenue they receive from this? Has the council considered the possibility that central London's air pollution has worsened since the introduction of LTNs, and other traffic calming measures which force motorists to only use certain routes, creating continuous day long traffic jams?</p> <p>(c) Owning a vehicle in Westminster or driving a vehicle into Westminster is not a luxury for many, it is an necessity. When will authorities stop looking</p>	<p>(a) 7D</p> <p>(b) 8F, 10B</p> <p>(c) 8A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		at motorists as a cash cow that they can bleed dry at every opportunity.	
181.	<p>██████████ ██████████████████████ Email dated 4th February 2024</p>	<p>The proposal as outlined would seem to allow individuals to park more than one car on the street at the same time when at present they may only park one car at a time. This seems to be a retrograde step, not maximising the provision of on-street parking to those who really need it, and only of benefit to the wealthy. It needs to be clear whether an individual can park all their cars at the same time, and whether individuals really means households.</p>	<p>5B, 5C, 1B, WSP replied to ██████████ on 12th February 2024 to confirm that, under the current proposals, the limit of three residents' permits is per person not per household. Provided a car has a valid residents' permit then it would be allowed to park in a residents' or shared-use parking place, so this would allow an individual to use up to three residents' car spaces if they have a valid permit for each vehicle.</p>
182.	<p>██████████ ██████████████████████ Email dated 5th February 2024</p>	<p>To suggest that the new charges are emissions based is misconceived.</p> <p>How does it make sense to charge so much to park an electric car?</p>	<p>7A</p>
183.	<p>██████████ ██████████████████████ Email dated 5th February 2024</p>	<p>I am emailing to object to the planned proposal to withdraw the current Westminster parking concession for electric vehicles (EV's). Please see grounds below:</p> <p>(a) The current low parking rate for EV's encourage a very high take-up of EV's. It provides commuters and shoppers with more accessibility to drive into Westminster and park for longer than 4 hours (especially those that live in more rural areas with limited access to public transport). The current scheme plays a very important role in the country's move towards net zero, encouraging employees to</p>	<p>(a) 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>return to the workplace post-COVID and the population supporting the retail industry. I do not believe the TMO has considered these bigger picture facts in the proposal.</p> <p>(b) I experience that most of the heavy carbon emitters in Westminster are the old vans and lorries that are servicing the ever-increasing construction in the borough. Regular EV drivers should not be penalised for this. Not only do these vehicles cause high pollution in the borough, a limited amount of available parking spaces, and traffic at every turn, but it is probably safe to assume that the drivers of these vehicles expense their parking charges to their company. It is neither fair, nor reasonable, to treat owners of electric vehicles (who are typically everyday individuals/commuters/shoppers) at similar weighting to these groups.</p> <p>(c) The borough/TMO could benefit from finding alternative solutions, such as levying a vehicle surcharge during the period of construction work (responsibility of the master contractor) to account for the natural increase in heavy emitting vehicles that the construction industry bring.</p> <p>(d) The consultation makes no mention of the cap on hours at which an electric vehicle may park in the same bay. Under the current scheme, an owner of an electric vehicle may extend their parking session (in the same bay) to capture a full day of parking. It appears that under new proposals, parking for EV owners would be limited</p>	<p>(b) 7A, 7I</p> <p>(c) 10B</p> <p>(d) WSP replied to ██████████ on 12th February 2024 to clarify that the current charges regime allows an electric vehicle to pay for 10 minutes of time in a pay-to-park bay which allows that vehicle to park for the maximum stay period in that bay, which is normally 4 hours. After 4 hours, all vehicles must leave that bay. The proposed charges regime</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>to 4 hours only. This is a very material change that has not been considered well enough in the proposals.</p> <p>(e) The increase in cost for an EV owner in zone G for a 4-hour period under the new consultation appears to increase by 381.25%. This increase is completely unacceptable and does not consider EV owners that choose an EV for better cost management. The proposal is a step backwards.</p> <p>(f) The UK government has made great efforts to encourage take up of EV's to help contribute to the country's net zero targets. Examples of these efforts are the great tax benefits (capital allowances/Benefit in Kind) offered to businesses for EV adoption. The current scheme offered by Westminster is one that picks up individuals, not businesses, and I strongly encourage the TMO to reconsider how EV owners are treated in the consultation.</p> <p>Should you wish to have a further discussion on the points above, please do let me know.</p>	<p>would not change the maximum stay period for vehicles (remaining at 4 hours) but would remove the 10-minute concession for electric vehicles, requiring them to pay a tariff based on their emissions level.</p> <p>(e) 3D</p> <p>(f) 7D</p>
184.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 5th February 2024</p>	<p>I hope this email finds you well.</p> <p>I am writing to you about the proposal for Resident Parking Changes.</p> <p>I think it is too early to make EV payable for parking</p>	5F, 7E

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>permits. I have just made the switch to EV and would not have taken one if Westminster did not offer free resident parking.</p> <p>That's just my personal opinion and experience I wanted to share with you.</p>	
185.	<p>██████████ ██████████ Email dated 5th February 2024</p>	<p>This is to register my objection to the proposed increase in parking charges citing emission-based charging as a “rationale for incenting residents [and non-resident parkers] to change their vehicles to access less costly parking charges”. This is preposterous and naive in the extreme.</p> <p>(a) The Mayor has already increased congestion charges and introduced a ULEZ scheme that offered a “failed” help to exchange program for owners who couldn’t afford to replace vehicles in the first place given the cost of ev’s, the poor and costly charging infrastructure.</p> <p>(b) In my case as a Westminster resident for ██████ years I have reduced my driving to less than 300 miles per annum thus reducing my emissions substantially from when my annual mileage was in excess of 12000 miles. Replacing my vehicle at a cost of more than £25000 to access a reduced parking charge of £100 yearly is completely a non starter. Availing reasonable parking costs helps me achieve this.</p> <p>(c) The notion that having to pay more to park will incent motorists to change their vehicles is</p>	<p>(a) 7L</p> <p>(b) 7C, 7D</p> <p>(c) 8A, 7I</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>naive on the part of the council; this charging scheme is just what it is, another fund raising scheme that cites an impractical rationale for increasing a cost that is not in any way linked to the emissions issue. Other emissions linked schemes such as petrol, diesel prices, increases to the congestion charge ie more usage related would make more sense and withstand scrutiny.</p> <p>(d) A PARKED VEHICLE IS NOT EMITTING ANYTHING!</p>	<p>(d) 7B</p>
186.	<p>██████████ Resident ████████████████████ Email dated 5th February 2024</p>	<p>I am emailing to object to the planned proposal to withdraw the current Westminster parking concession for electric vehicles (EV's). Please see grounds below:</p> <p>(a) The current low parking rate for EV's encourage a very high take-up of EV's. It provides commuters and shoppers with more accessibility to drive into Westminster and park for longer than 4 hours (especially those that live in more rural areas with limited access to public transport). The current scheme plays a very important role in the country's move towards net zero, encouraging employees to return to the workplace post-COVID and the population supporting the retail industry. I do not believe the TMO has considered these bigger picture facts in the proposal.</p> <p>(b) I experience that most of the heavy carbon emitters in Westminster are the old vans and lorries that are servicing the ever-increasing construction</p>	<p>(a) 7D</p> <p>(b) 7A, 7I</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>in the borough. Regular EV drivers should not be penalised for this. Not only do these vehicles cause high pollution in the borough, a limited amount of available parking spaces, and traffic at every turn, but it is probably safe to assume that the drivers of these vehicles expense their parking charges to their company. It is neither fair, nor reasonable, to treat owners of electric vehicles (who are typically everyday individuals/commuters/shoppers) at similar weighting to these groups.</p> <p>(c) The borough/TMO could benefit from finding alternative solutions, such as levying a vehicle surcharge during the period of construction work (responsibility of the master contractor) to account for the natural increase in heavy emitting vehicles that the construction industry bring.</p> <p>(d) The consultation makes no mention of the cap on hours at which an electric vehicle may park in the same bay. Under the current scheme, an owner of an electric vehicle may extend their parking session to capture a full day of parking. It appears that under new proposals, parking for EV owners would be limited to 4 hours only. This is a very material change that has not been considered well enough in the proposals.</p> <p>(e) The increase in cost for an EV owner in zone G for a 4-hour period under the new consultation appears to increase by 381.25%. This increase is completely unacceptable and does not consider EV</p>	<p>(c) 10B</p> <p>(d) The current charges regime allows an electric vehicle to pay for 10 minutes of time in a pay-to-park bay which allows that vehicle to park for the maximum stay period in that bay, which is normally 4 hours. After 4 hours, all vehicles must leave that bay. The proposed charges regime would not change the maximum stay period for vehicles (remaining at 4 hours) but would remove the 10-minute concession for electric vehicles, requiring them to pay a tariff based on their emissions level.</p> <p>(e) 3D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>owners that choose an EV for better cost management. The proposal is a step backwards.</p> <p>(f) The UK government has made great efforts to encourage take up of EV's to help contribute to the country's net zero targets. Examples of these efforts are the great tax benefits (capital allowances/Benefit in Kind) offered to businesses for EV adoption. The current scheme offered by Westminster is one that picks up individuals, not businesses, and I strongly encourage the TMO to reconsider how EV owners are treated in the consultation.</p> <p>Should you wish to have a further discussion on the points above, please do let me know.</p>	<p>(f) 7D</p>
187.	<p>██████████ Resident ████████████████████ Email dated 5th February 2024</p>	<p>You asked for views on the proposed change to charges for resident permits. I hope that means that there is a possibility that this change will not go through. I will be someone impacted – and someone who is also impacted by air quality - and my experience provides an explanation as to why, respectfully, the proposal is retrospective, regressive and in truth will not achieve the aims sought.</p> <p>By way of background, I bought a new car in 2009 - a modest though very nice ██████████ - replacing my old car which I had bought in 1997. At the time car manufacturers were pushing diesel cars. However I always thought diesel cars were polluting – regardless of improvements made – and</p>	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>so opted to stay with a petrol car. When it came to renewing the tax however, I discovered the reason that diesel cars were so popular: central government had changed the tax structure to promote diesel cars. As such I found my car tax was a huge sum to pay and it was incredibly frustrating to see large diesel SUVs and other large diesels – belching out fumes - paying much much lower tax than I was. The salesman didn't mention the new regime of tax to me and so I was stuck.</p> <p>The reason for paying such a high rate of tax was not only because it was petrol powered but because my car was an automatic, which despite it being more efficient than a geared car, was determined by the DVLA to emit more CO2 and was therefore pushed up into the next bracket of tax than its manual equivalent. This without any testing or any appeal or the fact that on each and every MOT test carried out, the actual CO2 measurements fall far lower than the 226 g/km set by the DVLA.</p> <p>Since then of course it became apparent to government – what was known to all of us before – that diesels are damaging to air quality and dangerous to health due to the particulates they generate. So diesel cars rightly lost favour; petrol was in terms of air quality better all along despite being punished for buying one.</p> <p>(a) However now the push is for electric cars and whilst that is certainly welcome in some respects –</p>	<p>(a) 7F</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>no question the exhaust emissions are lower given there are no emissions. However what it fails to take into account is that due to the significantly higher weight due to the batteries, the particulates created by tyre wear is far greater than conventional ICE cars. So even if, petrol exhaust is certainly unwelcome, as far as local air quality, petrol cars are still better in terms of PM2.5s than the majority of electric cars.</p> <p>(b) Now there is certainly an issue of climate change. But the purpose of taxation is to change behaviour not to retrospectively punish. If plans are made well in advance, then behaviour can change but if made without warning, then what are we supposed to do. Scrapping perfectly good cars will cause far more harm to the climate than keeping perfectly good existing petrol cars. And my car in over 15 years has only done 35,000 miles (most of it actually on French motorways) and runs perfectly. It would be a crime against the environment for it to be scrapped.</p> <p>(c) And of course that is assuming it is even affordable to scrap and buy a new car. The DVLA when I queried the huge cost of the tax disc and asking if there was anything I could do to change things wrote back and said: buy a new car. Having just bought a new car and spent a huge amount of £24,000, I found that really unpleasant. But that is what you will be telling all the residents of Westminster to do. And so those that can buy say top of the range electric Mercedes – or indeed</p>	<p>(b) 8C, 8E</p> <p>(c) 3A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>those with chauffeurs and drivers - will be fine but the rest of us mortals running old cars, will be penalised. That is not fair.</p> <p>(d) And finally of course in all this, the policy doesn't take into account the amount a car is driven. In my case I now drive my car only once or twice a month when I need to stock up on heavy things from the supermarket. The rest of the time I buy food on foot locally. So I am not polluting my local environment at all and doing the right thing. But I have to park my car somewhere – and I do need it on occasions. It is worth nothing but it has hardly done any mileage and so it would be a crime to scrap it. So what am I to do? Basically I have no choice. I need a parking permit because I need to park my car. But whilst it sits on the road, even if it is low polluting – compared to diesel and electric cars – it actually doesn't pollute at all; and yet I will be punished simply because I decided back in 2009 not to buy a diesel car in order to protect people's health at a time when the government was pushing people to buy diesels (and causing the premature death of thousands).</p> <p>(e) So much more can be said but I hope this gives you a flavour of why the proposals being made are not fair. As I said such a change would be retrospective – something that undermines the principle of tax in this country; it would be regressive – punishing those on the lowest incomes; and would not achieve the stated aim, i.e. it would not actually impact air quality at all and in</p>	<p>(d) 7I, 7B</p> <p>(e) 8C, 3A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>my case would potentially cause more CO2 emissions in the event I finally had to give up and scrap my car and buy a new one.</p> <p>(f) So all round, I hope on reflection, the proposal will be withdrawn and the existing policy will be retained. Or – in an effort of compromise – at the very least that it should be phased in for new cars bought from say January 2025 onwards in order to give time for local residents to adapt and help avoid the regressive and retrospective aspects of any immediate change.</p>	(f) 5H
188.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 5th February 2024</p>	<p>Objections to proposals.</p> <p>Like most of these initiatives it's not really about improving residents lives it's about increasing income but without thinking about the effect of loss of footfall for businesses in Westminster which will just result in empty properties increased crime and subsequently loss of tourist income. We already have the highest level of taxation in peacetime and as such increasing costs will neither improve the environment or the quality of life for local residents and businesses.</p>	8A, 12A, 3C
189.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 5th February 2024</p>	<p>I am writing to share my view on your consultation on proposed parking charges.</p> <p>I am strongly against your proposals.</p> <p>(a) They indicate that you have now ceased to operate as a council, providing a service (parking</p>	(a) 8B

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>spaces) in exchange for money, but have set yourselves up as judge and jury to mete out taxes to citizens.</p> <p>(b) We have taken care to spend extra money to make sure our vehicle is ULEZ compliant. Having cleared that barrier, you are now demanding more money from us merely because we cannot afford a brand new vehicle. This tax is completely unprogressive, as it financially punishes people with older cars, while rewarding wealthy residents with the wherewithal to buy new cars.</p> <p>(c) ULEZ was one thing. This is a serious overreach which has nothing to do with your function as a council of providing parking to residents.</p> <p>(d) Drivers in Westminster typically drive some of the shortest distances in the country, but cars are essential to some of us. I for one, cannot get to my work in time for the start of my shifts with public transport. Why must our council be a test-case of punitive taxation so that you can wave around your green credentials?</p> <p>(e) With vastly increasing public transport costs, high inflation and serious rises to the cost of living, this deeply unfair tax places yet another burden on struggling residents at the worst possible time.</p> <p>This tax is unfair and morally wrong.</p>	<p>(b) 7L, 3A</p> <p>(c) 8B</p> <p>(d) 12B</p> <p>(e) 3E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
190	<p>██████████</p> <p>████████████████████</p> <p>Email dated 5th February 2024</p>	<p>WHAT TOTAL AND UTTER CRAP! A BUNCH OF BLITHERING IDIOTS WHO COULD NOT RUN A TAP, LET ALONE A COUNCIL. GET STUFFED! 🤢🤮🐑🐑💩💩💩</p>	Noted.
191.	<p>██████████</p> <p>Resident</p> <p>██████████</p> <p>Email dated 5th February 2024</p>	<p>(a) I would like to object to proposal 8056/PJ, the Tariff and Permit Pricing Restructure.</p> <ul style="list-style-type: none"> • The counsel would like to reduce carbon emissions; • carbon emissions are produced when motor vehicles are operated; and • parked vehicles do not produce any carbon emissions at all. <p>(b) Whilst introducing higher fees for pay-to-park parking seems a reasonable approach to reduce carbon emissions, introducing higher charges for residents parking permits seems to be an unreasonable approach. Central London residents often (solely) maintain a car to leave the Central London area, i.e. to drive to remote locations. This is causing minimal carbon emissions in Central London for which the vehicle user is already paying as part of the ULEZ. Central London residents often do not use their cars (parked in residents parking) to move within the Central London area; public transport and walking are the most efficient, economic, and fast options. Any additional charge would be a double-charging on residents for carbon emissions due to the in-place ULEZ.</p>	<p>(a) 7B</p> <p>(b) 7G, 7L</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(c) Charging residents higher fees for parked cars, not dependent on the use, is not able to meet the goal to reduce carbon emissions because parked cars do not produce any carbon emissions at all. Furthermore, it is not able to incentivise cleaner less polluting vehicles because parked cars are not used by definition.</p> <p>(d) A lot of residents maintain older/pre-2015 diesel vehicles for long-distance travel solely. Often this represents a very economic and sustainable option as the vehicles are owned and used for longer journeys only; whilst being parked most of the time, those vehicles do not produce any carbon emissions most of the time. Keeping older cars in use is often very sustainable in the overall view because a replacement has a high initial carbon footprint. Punishing those residents for their economic and sustainable decision to keep a vehicle long-term does not represent a sound and socially correct approach. Central London residents already bear high costs operating a vehicle, mainly due to already high charges for Congestion Charge, ULEZ, and resident parking. For a lot of those residents owning a car is the only viable option to do long-distance journeys to remote locations and care for their families; those residents should not be charged higher fees, especially considering the cost-of-living crisis the UK is facing.</p> <p>I hereby object to the proposal 8056/PJ, the Tariff and Permit Pricing Restructure. I encourage the counsel to reconsider their plans and ask them to</p>	<p>(c) 7B</p> <p>(d) 9A, 7L, 3B, 3E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>focus on charging vehicles when moved. Charging residents more for (barely used) parked vehicles does not seem to be reasonable measure and represents also social hardship.</p>	
192.	<p>██████████ ████████████████████ Email dated 5th February 2024</p>	<p>I wish to object to the changes outlined under the code 8056/PJ and entitled: Tariff and Permit Pricing Restructure</p> <p>Objection reason: You are behaving as if climate change is sorted, or as if climate change were last year's fad. Climate change is 100% real and your proposed changes to the per hour fees for "Pay to park" make a mockery of anyone who is trying to argue that we need to take action against pollution in Westminster and climate change in the world.</p> <p>Your proposed changes would tell anyone considering a new car not to worry about the environment, you'll only save a few pence over a petrol car, so petrol cars can't be that bad.</p> <p>Petrol cars are that bad, and you knew they were when you first introduced this scheme. Climate change is real and hasn't gone away.</p> <p>As I sit right now in a road just off Oxford street looking at all the parked cars, less than 5% are electric. This change will make a negligible change to Westminster's parking income but will make a massive impact to anyone thinking of changing their car and considering the benefits of electric vs petrol.</p>	7D

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>If this is a majority Labour council then I literally don't know what Labour stands for anymore if you're as bad as the Conservatives when it comes to reversing policies designed to help us all deal with climate change.</p> <p>You should all be ashamed of yourselves for proposing such a draconian change which will make zero difference to Westminster's bottom line but will make a massive difference to people's propensity to get an electric car vs a petrol one if you were to make this terrible change.</p> <p>Shame on you!</p>	
193.	<p>██████████ ██████████ Email dated 5th February 2024</p>	<p>Our household only runs on pure electric cars. The main reasons:</p> <p>(i) Help the environment</p> <p>(ii) As EV cars cost a lot more than polluting cars, discount parking was one way of trying to offset against the cost. Now Westminster want to penalise people like us who have taken this expensive route and kick us by introducing parking charges as same as petrol and diesel cars. Absolute disgrace. If this goes through, my family and I will never vote for Labour.</p>	7A
194.	<p>██████████ ██████████</p>	<p>I write in relation to the Council's proposals concerning the pay-to-park and residents' permit schemes. I am a resident of Westminster and live</p>	2E, 5A

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>[REDACTED]</p> <p>Email dated 5th February 2024</p>	<p>at [REDACTED]</p> <p>I applaud the aims and intentions of the policy. My concern relates to the suggestion that individuals will be able to purchase permits for three vehicles. This is an increase on the current scheme which allows permits for two vehicles per person.</p> <p>I could not see any explanation for this increase in the Reports dated or 26.6.23 or 6.11.23. It is difficult to understand why any single individual could legitimately require three cars. This extension goes against the very essence of the scheme, viz. to improve air quality. Residents should be being encouraged to buy fewer cars, and travel by alternative, less-polluting methods; they should not be being encouraged to buy even more cars.</p> <p>I would therefore invite the proposals to be amended so that each individual is only able to purchase permits for two vehicles, rather than three.</p>	
195.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 5th February 2024</p>	<p>(a) Whilst I understand the thinking behind these proposed changes to permit pricing, the plan seems to introduce these proposed changes at very short notice ie on 1/4/24 - This is just 9 weeks after being advised of these proposals by email (received 27/1/24) which gives a two week window till 14/2/24 to comment upon them. By the time the final decisions are made it gives residents who might be adversely affected by these changes little time to respond to them especially if it means</p>	<p>(a) 8E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>changing their vehicles. I think at least 6 months notice should be give of such changes.</p> <p>(b) I also note it is proposed that an additional annual diesel surcharge of £50 apply to Residents Parking Permits for pre-2015 diesel vehicles to address the issue of the emission of Nitrogen Oxides (NOx).</p> <p>Opposed to having a blanket charge on all pre-2015 diesel vehicles regardless of the NOx and PM emissions, It would be fairer and indeed more sensible to state a precise emission standard a vehicle must meet ie Euro 6 Diesel Emissions Standard, and/or a Nitrogen Oxides (NOx) emission limit ie 80mg/km NOx (and 4.5mg/Km Particulate Matter) which is exactly what the Ultra Low Emission Zone (ULEZ) requirements do very clearly and effectively.</p> <p>(c) Having a separate standard for Nitrogen Oxides (NOx) emissions in Westminster compared to the rest of London/ULES Standards will only go to complicate matters and add a unnecessary layer of confusion and contradiction. It will also lead to the unfair charging of certain pre 2015 ULEZ compliant diesel vehicles that meet the recognised and accepted ULEZ NOx and PM standards.</p>	<p>(b) 7I</p> <p>(c) 4A</p>
196.	<p>██████████</p> <p>██████████</p>	<p>we strongly object to the changes to the traffic orders, as proposed.</p> <p>The proposed pay to park schedule hardly</p>	7D

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	Email dated 5 th February 2024	<p>differentiates between non-polluting vehicles, ie absolutely non-polluting (zero emissions) vehicles from the highest polluting cars (e.g. diesel) - for instance, an hourly charge of £3.18 vs £4.77.</p> <p>This is hardly an incentive to utilise electric vehicle to lower the overall pollution levels, & encourages use of diesel within the borough as the initial higher expense of the former will not be sufficiently offset by a meagre £1.59 saving per hour of parking!</p>	
197.	<p>██████████ ████████████████████ Email dated 8th February 2024</p>	<p>we strongly object to the changes to the traffic orders, as proposed.</p> <p>Reason:</p> <p>(a) <u>insufficient notice of change</u> - we have bought an electric car in good faith, to support the positive environmental policies espoused by the government & the council. The higher initial cost of this is balanced by the initiatives offered by the council including a reduced parking rate compared to polluting vehicles.</p> <p>With very little notice, the proposal seeks to almost dispense with this reduction where there is very little difference in the hourly payment rates between non-polluting vehicles, i.e. absolutely non-polluting (zero emissions) vehicles compared to the highest polluting cars (e.g. diesel) - for instance, an hourly charge of £3.18 vs £4.77.</p> <p>This is hardly an incentive to utilise electric vehicle</p>	(a) 8E, 7D

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		to lower the overall pollution levels, & encourages use of diesel within the borough as the initial higher expense of the former will not be sufficiently offset by a meagre £1.59 saving per hour of parking (b) A longer consultation period, as well as a longer notice period is required if this change should be implemented.	(b) 8E
198.	██████████ ██████████ Email dated 5 th February 2024	I really think that cleaning London of pollution will suffer badly if electric vehicles are put in the same “pool” as hybrids and plug ins, as they are the only vehicles that are completely clean of pollution and should have distinction from all the hybrids and plug ins, as those do pollute London’s air, less than fully fuelled vehicles and should encouraged and promoted as such.	7A
199.	██████████ ██████████ Email dated 5 th February 2024	I have a strong view on totally EVs as they have zero pollution compared to hybrid or plug ins and should be treated with utmost encouragement as such!	7A
200.	████████████████████ Resident ████████████████████ Email dated 5 th February 2024	As a long-standing resident of Westminster, I would like to object to the recent proposals on parking. Over the past few years, under the guise of environmental benefits, Westminster has constantly increased the cost of living in central london. At no stage is any due and fair regard taken for the actual residents who live here. To give us 4 months’ notice on significant proposed increases to our parking permits is another example of this unfair	3E, 8E, 7C, 3C

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>and unjust targeting of individuals. To blanket a tax on emissions which is not directly linked to how much a car is actually used in the area, is unfair. To have a vehicle that i use to come in and out of london (long distance) but it parks and does not drive around london itself on a daily basis, charged more than vehicle that is used every day in central london actively polluting the air, more in totality, does not feel fair or well considered. The amount of emissions a car emits is not just a function of its engine, it's a function of its utilization. If the objective is to lower emissions you should target all car usage or tax this based on actual omissions. Your continued targeting of residents will simply result in Westminster being unaffordable for every day Londoners and the long term effects on the city will be detrimental.</p> <p>Tax is always an easy thing to turn to, we need to think of smarter ways to achieve the objective that is fairer and more reflective of actual impact.</p>	
201.	<p>Lisson Green Resident</p> <p>Letter stamped 31st January 2024</p>	<p>I hope this letter finds you well. I am writing to express my concerns and opposition to the proposed changes in the tariff and permit pricing restructure, specifically the introduction of emissions-based charging for pay-to-park casual kerbside parking and residents' parking permits.</p> <p>While I understand the City of Westminster's commitment to improving air quality and reducing carbon emissions, I believe the proposed emissions-based charging system is not the most</p>	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>effective or equitable solution. My concerns are as follows:</p> <p>(a) Financial Burden on Residents The proposed scheme imposes additional financial burdens on residents who may own multiple vehicles. Replacing the current policy of allowing up to two vehicle registration marks (VRMs) on a single permit with a system that requires a separate permit for each vehicle, along with incremental surcharges, could disproportionately impact individuals and families with multiple cars.</p> <p>(b) Limited Consideration for Alternative Fuel Vehicles The focus on tailpipe emissions of Carbon Dioxide (CO2) and the additional diesel surcharge for pre-2015 diesel vehicles may not adequately consider alternative fuel vehicles, such as electric or hybrid cars, which are contributing positively to reducing emissions. The scheme should incorporate a more comprehensive and future-oriented approach to encourage the adoption of cleaner technologies.</p> <p>(c) Exclusion of Older Vehicles: The emissions-based charging system, particularly for vehicles registered before 2001 or those not registered in the UK, could lead to exclusionary practices. It penalizes owners of older vehicles who may not have access to CO2 data, potentially affecting individuals with limited financial means who rely on older vehicles.</p>	<p>(a) 5D</p> <p>(b) 7D</p> <p>(c) 3A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(d) Lack of Incentives for Behavioural Change: The proposed scheme primarily relies on financial disincentives rather than actively encouraging residents to shift towards cleaner transportation options. A more holistic approach could include incentives such as discounts for electric vehicle owners, promoting positive behaviour and fostering a more sustainable transport culture.</p> <p>(e) Insufficient Public Consultation: It is crucial to ensure that the proposed changes are thoroughly discussed and evaluated with the input of the affected community. Adequate public consultation should be conducted to gather diverse perspectives, ensuring that the policies put in place are fair, transparent, and well-received by the residents.</p> <p>In conclusion, I urge the City of Westminster Council to reconsider the proposed tariff and permit pricing restructure and explore alternative solutions that are more inclusive, promote the adoption of cleaner technologies, and consider the financial implications on residents. I believe a collaborative and well-informed decision-making process will result in policies that truly benefit the community while addressing environmental concerns.</p> <p>Thank you for considering my concerns, and I look forward to a positive and constructive resolution to this matter.</p>	<p>(d) 7D</p> <p>(e) 8E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
202.	<p>██████████</p> <p>██</p> <p>Email dated 6th February 2024</p>	<p>The cost of an EV and now it's associated depreciation is very high and with slowing sales in the UK, the incentives to adopt should be continued for some time.</p> <p>My objection would be to splitting between EVs by size of battery and equating the permit cost for =>70 kw to a small combustion engined car. This is not the case.</p> <p>“Range anxiety” is real and is putting off adopters of electric cars as much as the costs. Penalising EVs with better range capability seems wrong.</p> <p>I can understand the council wanting to move away from free permits, but I would make all EVs £40.</p>	11E
203.	<p>██████████</p> <p>Resident</p> <p>██</p> <p>Email dated 6th February 2024</p>	<p>As a council tax paying resident of Westminster I object to the changes being proposed to permit fees for electric vehicles. As widely published in the media sales of EV's have flatlined. There are only a million EVs on our roads. It further makes no sense to Nox producing vehicle owners to make the switch to electric if theyre are nor incentives. The changes outlined will take away additional savings associates with driving electric and with electric prices vastly increasing average 79p /kwh your policy change increasing numbers of drivers recerting back to combustion engine vehicles.</p> <p>Please reconsider.</p>	7D
204.	<p>██████████</p>	<p>I am writing further to the email I received about the</p>	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>Resident</p> <p>████████████████████</p> <p>Email dated 6th February 2024</p>	<p>restructuring of pricing for EV Parking Permits & EV Kerb Side Parking in Westminster.</p> <p>I own an EV vehicle and have a Westminster C Zone permit and regularly park within Westminster, benefitting from the concession fees currently offered.</p> <p>(a) I was encouraged to purchase an EV vehicle due to the concessions that were offered to EV owners in the borough.</p> <p>As you will appreciate all car manufacturers produce a petrol / diesel equivalent model to their EV models, which are markedly lower in price and EV vehicles have depreciated at a much greater rate than non EV models over recent months. However, the incentives to own an EV model in Westminster, namely no fee for a resident permit and discounted parking within Westminster made the initial purchase price more palatable.</p> <p>I can only assume that if these benefits are removed you will see a drop in the purchase of EV vehicles and usage in the area as residents opt for cheaper petrol / diesel models when next replacing their cars or considering to buy and this would lead to an increase in air pollution which the borough is so desperately trying to avoid.</p> <p>If the initial outlay and running costs of a non EV vehicle are noticeably less then there seems little point buying an EV vehicle if Westminster no longer</p>	<p>(a) 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>offer benefits for residents to do so.</p> <p>(b) This ultimately feels like another tax on local residents who live within the borough, who when encouraged to drive electric and did so, have now been let down by this initiative.</p> <p>(c) It is interesting that the council have itemised the breakdown on proposed permit charges but have not mentioned the new price bandings for kerb side parking. In Paris they have decided to further increase the charges of petrol and diesel vehicles rather than implement charges for EV. Perhaps this should happen in Westminster.</p> <p>As you will have gathered I am not in favour of the changes.</p>	<p>(b) 3C, 7E</p> <p>(c) The proposed charges for pay-to-park bays are set out in the City Council's Notice of Proposals alongside the breakdown of proposed charges for residents' permits. Please see section A2 in the Schedule of the "Proposed tariff and permit pricing restructure" PDF document available at https://www.westminster.gov.uk/parking/changes-how-we-charge-parking.</p>
205.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 6th February 2024</p>	<p>I am writing to object to the Council's proposed changes to the 'pay to park' policy for electric cars.</p> <p>I live in ██████████ and work ██████████, and frequently park in the electric parking bays in ██████████. I should add that I also regularly drive my son, ██████████, to school. I also regularly drive into the West End at the weekend to go shopping or to eat out.</p> <p>(a) Up until July of last year, I drove a petrol car. The sole reason I sold that and bought an electric car was because of Westminster's favourable treatment of electric cars, which includes the</p>	<p>(a) 7D, 7E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>parking concession and the congestion charge exemption. The reality is that, as well as being much more expensive to buy, driving an electric car is a great deal of hassle compared to a petrol car, particularly given that I do not have a driveway at home for charging. I could however cope with the additional hassle (and expense) because of Westminster's concessions for electric vehicles.</p> <p>However, if the '10 minute parking' disappears, the trade off will no longer be worth it and I will inevitably go back to petrol. This will obviously increase emissions which, I had thought, was the exact opposite of Westminster's stated objective to improve air quality and reach its goal of a net zero city by 2040.</p> <p>(b) I would add that the designated electric car parking bays at Lincoln's Inn are hardly ever full and as such it is difficult to see the proposed changes as anything other than a money making scheme by the Council. Coupled with the fact that the congestion charge exemption will no longer be available after 24 December 2025, there will be no incentive at all to drive an electric car in Westminster.</p>	(b) 8A
206.	<p>██████████ ██████████ Email dated 6th February 2024</p>	<p>I am an electric car driver that drives into town regularly each week to attend doctors and other appointments.</p> <p>(a) I brought an electric car three years ago to help the environment and help pollution in town.</p>	(a) 3D

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>The electric car costs more than petrol but the benefits where worth it for me particularly the congestion charge and parking charges in town.</p> <p>To be informed of the change to parking charges was very distressing as this would change my financial situation enormously as I cannot either walk or take public transport into Westminster.</p> <p>(b) You plan to make these changes so quickly it will not give people adequate time to assess the situation and what it means to them.</p> <p>I reject this proposal for all the above reasons.</p> <p>(c) I feel like I was encouraged to Buy an electric car for the benefits and now after making the choice the goalposts are being changed.</p>	<p>(b) 8E</p> <p>(c) 7E</p>
207.	<p>██████████ ██████████ ██████████ Email dated 6th February 2024</p>	<p>Regarding the proposed resident parking increases, I would like to recommend that some consideration is given to resident owners of vintage/classic cars.</p> <p>(a) I am a retired pensioner who drives only 2-3,000 miles a year, mostly to the countryside. Within Westminster and beyond I either cycle, walk or use my Freedom Pass.</p> <p>(b) It appears that my permit charge will rise from £166 to £321 which is an unwelcome increase given the economic times that we live in. This</p>	<p>(a) 7C</p> <p>(b) 3A, 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>amount will be irrelevant to many wealthy residents of Westminster but difficult for those on lower incomes who are not in a position to purchase a new electric car. I would therefore question how this proposal will incentivise residents to change cars.</p>	
208.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 6th February 2024</p>	<p>(a) My understanding of Parking is to rent an uncertain temporary space where the vehicle will be stationary and for the most part the engine of whatever type will be switched off. In those circumstances there is limited pollution therefrom. In order to drive to a parking space within Westminster the vehicle travels through both Congestion charge and ULEZ zones which make charges for various types of pollution created by those vehicles.</p> <p>(b) The proposed Westminster parking charges are therefore merely an additional arbitrary charge being imposed by Westminster to achieve income not related to its services and out-with its authority. Were charges genuinely being made to address pollution they would need to take into account not only the rates of pollution made by each vehicle, but the period of usage of each vehicle rather than their stationary state.</p> <p>(c) Whilst some charges such as the present system require payment in advance for the right to a parking space, if available, whether used or not, many residents only use their vehicles to exit Westminster where they then don't pollute</p>	<p>(a) 7B, 7L</p> <p>(b) 8A, 8B, 7I</p> <p>(c) 11B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>Westminster much at all. It is the influx and business use within Westminster that creates the vast majority of the pollution.</p> <p>(d) The proposed charging system is therefore entirely misdirected, unfair on most individual residents and is merely a tax by another name on those who are not guilty of the offence being addressed.</p>	<p>(d) 8A</p>
<p>209.</p>	<p>██████████ ██████████ Email dated 6th February 2024</p>	<p>I am moved to write to you, as I understand there is a consultation regarding electric vehicle parking.</p> <p>(a) I am a regular user of this facility as I commute to Westminster to work. I bought my electric car because I knew that Westminster were offering this concession and now feel vulnerable and cheated.</p> <p>(b) This is a further erosion of trust in public facilities. I am deeply distressed that the congestion and emission charges are simply there to hike income and have nothing to do with either emission or traffic. If Westminster is serious about going green, then scrapping the EV parking concession is not the right way to go about it.</p> <p>I urge those who are listening to continue to allow the concession or to offer a new and different concession to electric car drivers, so as to encourage the growing use of electric vehicles. Simply wiping away the concession and its totality is unfair, greedy and wrong.</p>	<p>(a) 7E</p> <p>(b) 8A, 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
210.	<p>██████████ ██████████ Email dated 6th February 2024</p>	<p>In principle I am but the bands you have chosen seem to be strange in that band 4 has a width of 29 g/km but band 5 has a width of 104 g/km. Could you please advise me how you have specified the bands.</p> <p>I do not have a 4x4/SUV/'chelsea tractor, far from it!, but I seem to be by 5 g/km transferred into a higher band than the current equivalent which is £75 more cost to me than if I was included in band 4</p> <p>How is this justified for a car which is smaller, lower and narrower than the many SuVs parked near me? My car is a clean diesel post 2015. Band 4 range is only 29 g/km but band 5 range runs from 151-255 ie a band width of 104, which means my 156 emission figure just sneaks into the higher very broad band.</p> <p>This seems unfair to a car of my type. I urge you to review the bands.</p>	5E
211.	<p>██████████ ██████████ Email dated 6th February 2024</p>	<p>I agree with the idea of banded charges for resident permits, but I don't think that the amount that you are charging for electric vehicles is anywhere near high enough. Any sort of conventional SUV is going to be in the highest band (band 5), yet the damage done to the roads by the equivalent electric vehicle and the particulate pollution from the tyres of such vehicles (which are nearly twice as heavy as a standard SUV), means that they</p>	2E

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		should be charged at least as highly as a standard SUV.	
212.	<p>██████████ ██████████ Email dated 6th February 2024</p>	<p>(a) Regarding your huge increase in resident parking charges. I know it's not worth giving comments because nothing ever happens and you go ahead anyway.</p> <p>(b) I can never understand why you charge more to park for vehicles with larger engines because when my vehicle is parked, it gives out zero emissions. Do I smell another con? I don't believe that pollution is even an issue but it is a money raiser.</p> <p>But go ahead anyway.</p>	<p>(a) 8G</p> <p>(b) 7B, 8A</p>
213.	<p>██████████ ██████████ Email dated 6th February 2024</p>	<p>I live in Westminster and have a resident's permit for my fully electric car.</p> <p>As you know the air is often very unpleasant, filled with grit and smog from cars and trucks pumping out dirty emissions. When the weather is particularly hot or cold I often see people sitting in their cars with engines idling. Many are rude when it is pointed out that Westminster is an idle-free zone.</p> <p>Regarding the proposals to increase the charges based on emissions, I believe they do not go far enough.</p> <p>I would support a policy similar to that recently</p>	2E

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>introduced in Paris to reduce the number of SUVs, which are too big for London, often block roads and are polluting. The Westminster proposals should include a hefty excess charge for SUVs and for the worst polluting cars. Without a deterrent the drivers of these cars, which have a detrimental effect on all of us, will continue to pollute London and make the air dangerous to breathe.</p>	
214.	<p>██████████ ██████████ Email dated 6th February 2024</p>	<p>I have just read about your proposal for new tariffs for resident parking permits and pay to park bays. I am Westminster council resident since January 2007.</p> <p>(a) I am founding new tariffs proposal as a "slap "in peoples face. With lack of governments grants for electric cars and now with changes to parking permits it will be even more discouraging for people to buy electric cars. Electric cars are already overpriced and not affordable for people even on £50000 per year salaries.</p> <p>(b) After paying rent or mortgage, council tax, bills, food, not everybody can afford to spend £500 (at least) on car lease. As owner of hybrid car I have enjoyed discounts on pay to park parking tariffs. Now I am going to be stripped of that privilege and on top of that I will pay more for parking per hour than I am paying in Kensington and Chelsea in pay to park bays. Your proposal is (for my car group) £5.00 where the same car I will park In Kensington and Chelsea for £4.70.</p>	<p>(a) 7D</p> <p>(b) 3E, 7E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>Considering that I spent over £4000 per year for pay to park parking, Kensington and Chelsea will get the money not Westminster.</p>	
215.	<p>██████████ ██████████ Email dated 6th February 2024</p>	<p>As a lifetime resident of the borough of Westminster and a driver I think your proposals are very extreme!!</p> <p>(a) Giving electric vehicles such low costs are madness seeing the price of these vehicles and the damage they are doing to our roads through the weight!! Not only that they are worse for the environment!! But sadly only non electric vehicle owners are being punished!! With the cost of living crisis and the price of public transport are you trying to bring London to its knees!!! Businesses and shops are suffering badly let alone no quality of life for residents!</p> <p>(b) My words will most probably mean nothing as these schemes are already in process of change but a final plea start charging cyclists!!! They would be a huge source of income and maybe stop them speeding talking on phones jumping red lights etc...</p>	<p>(a) 11A, 9A, 3E, 12A</p> <p>(b) 8G. The City Council seeks to encourage cycling in Westminster and it is, therefore, considered that charging cyclists for use of the road or parking would be counterproductive and could also entail costly infrastructure and data management systems to operate. It is noted that the City Council provides secure cycle hangars which attract an annual membership charge to contribute towards the service.</p>
216.	<p>██████████ Resident ██████████</p>	<p>Thank you for presenting the proposal.</p> <p>Whilst I see the necessity of reducing the carbon emission in London by 2040, I am afraid the</p>	7B, 8A

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	Email dated 7 th February 2024	<p>proposal that has been put in place does not align with these goals. The portal just aims to charge higher emission vehicles to be charged more fees. The ULEZ that is currently in place has tackled this. As a resident of Westminster I do not feel by increasing the price of parking permits based on tier will give any benefit of reducing the emissions of London. I just see it as a way of increasing the cost of the resident permit.</p> <p>I object too this proposal.</p>	
217.	<p>██████████ Resident ██████████</p> <p>Email dated 7th February 2024</p>	<p>(a) I am a resident in Westminster an oppose of the changes. You are trying to tax us more on top of all the payments we make to the council both directly and indirectly which is unacceptable.</p> <p>(b) ULEZ and congestion is already in place to ensure lower emissions and you are now forcing people to get rid of their vehicles in the midst of a cost of living crisis.</p> <p>Unacceptable and as a resident who wants the best for the Westminster area I am opposed to these changes.</p>	<p>(a) 8A</p> <p>(b) 7L, 3E</p>
218.	<p>██████████ ████████████████████</p> <p>Email dated 7th February 2024</p>	<p>I am writing to object to an element of the planned changes to pay-to-park parking in Westminster.</p> <p>I am in favour of the existing structure for EV parking in pay-to-park bays (pay for 10 minutes, stay for maximum allowable - typically 4 hours). Grounds: EVs are exactly the kind of private vehicle</p>	7D

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>that we want in central London, as opposed to hybrids and pure fossil fuel cars. By increasing charges on EVs, the only way the informed (and uninformed) public will view this is that of a disincentive to use EVs and a penalty on EV owners. It is increasing the cost of using an EV in central London, and NOT incentivising their use (the opposite of what we need).</p> <p>This element of your proposal is anti-environment, anti-EV and a wholly bad idea.</p>	
219.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 7th February 2024</p>	<p>I would like to register an OBJECTION to the proposal on Tariff and Permit Pricing Restructure (Emissions-Based Charging).</p> <p>Reason:</p> <p>(a) Proposal to increase parking charges for pure electrical vehicles is in clear contradiction to the stated purpose of reducing emission.</p> <p>(b) If proposed changes result in an increase of overall collection from residential parking permits then this proposal should be categorized as an increase in taxation.</p> <p>(c) Further, Westminster council is in possession of information on types of vehicles currently registered on residential parking permits. It is very simple to calculate the impact of proposed changes on overall amount of collection from this category. The fact that this assessment is not included in the</p>	<p>(a) 7A</p> <p>(b) 8A</p> <p>(c) 11A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>report leads me to believe that the stated purpose (Reduction in Emissions) is not fit for purpose.</p> <p>I will be sending a separate FOI request for the access to the analysis of the proposed impact.</p>	
220.	<p>██████████ ██████████ Email dated 7th February 2024</p>	<p>I am writing to strongly object the current consultation paper which aims to withdraw the concession for electric vehicles allowing vehicles to park up to the bay's maximum stay for a minimum 10-minute payment.</p> <p>(a) This new measure is disproportionately and negatively impacting drivers who have made the choice to drive clean and sustainable vehicles to support and align with the country and government long term ESG and sustainability goals. Although this initiative is inevitable, it comes way too early and with virtually no notice and poor communication around it. EV drivers should at least be granted a few years to adapt to this new norm as many of us would have contracted long lease agreements with car manufacturers precisely for daily commute purposes. The minute this new rule is enforced, it will virtually make it economically impossible for us to park in town on a work day, strongly impacting our professional lives.</p> <p>(b) Further, I can't even begin to imagine the negative impact on the entire EV-driven community of businesses and tech companies that are currently operating in London and flourishing on the back of this amazing subsidy initiatives. This</p>	<p>(a) 7E, 8E, 5F, 12B</p> <p>(b) 12A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>includes, EV-charging point developers, small and medium businesses who have invested millions of pounds into shifting to electric fleets for their workers (and will see their operating costs bounce overnight) but will also completely annihilate innovation in the EV-sector in Central London (companies like On.to for example). Currently this measure is something that Westminster EV commuters are very proud of and a clear differentiator for the council, why turn this into one of the most unpopular measure of all time?</p> <p>(c) Finally, the change proposed itself seems too drastic and disproportionate. Why not look to compromise by starting to change prices on the weekend or a limited amount of days to create a transition period for current subsidy-dependent people commuting to Westminster every day? Why not look into specific cases of people fully reliant and dependent on it? Why not filter by models first? Many of us who drive to London often have no other choice but driving to town as living too far from tube stations or having commute restrictions for personal reasons. This will create a huge impact on our lives, both personal and professional.</p> <p>(d) This is one of the most important decisions that the council may have to do in recent times with significant impact in flows of people and businesses which clearly seems to be totally underestimated. This change should not be taken lightly and would deserve to be more broadly advertised over a longer period of time and discussed with the</p>	<p>(c) 7I, 3B</p> <p>(d) 8E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>broader Westminster EV driven community. This change is at risk of becoming one of the most unpopular measures ever taken at the council level since the Park Lane bike lanes!</p> <p>Many thanks for your consideration.</p>	
	<p>Email dated 21st February 2024</p>	<p>This is a very important decision that the council is about to make and it should not be rushed nor taken lightly as the consequences on electric drivers could be dramatic.</p> <p>I really could not stress the important of this more, especially from my position of being an electric driver myself and witnessing the situations of others.</p>	<p>Noted.</p>
<p>221.</p>	<p>██████████ ████████████████████ ████████████████████ Email dated 7th February 2024</p>	<p>I am writing to strongly object the current consultation paper which aims to withdraw the concession for electric vehicles allowing vehicles to park up to the bay's maximum stay for a minimum 10-minute payment.</p> <p>(a) This new measure is disproportionately and negatively impacting drivers who have made the choice to drive clean and sustainable vehicles to support and align with the country and government long term ESG and sustainability goals. Although this initiative is inevitable, it comes way too early and with virtually no notice and poor communication around it. EV drivers should at least be granted a few years to adapt to this new norm as many of us would have contracted long lease</p>	<p>(a) 7E, 8E, 5F, 12B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>agreements with car manufacturers precisely for daily commute purposes. The minute this new rule is enforced, it will virtually make it economically impossible for us to park in town on a work day, strongly impacting our professional lives.</p> <p>(b) Further, I can't even begin to imagine the negative impact on the entire EV-driven community of businesses and tech companies that are currently operating in London and flourishing on the back of this amazing subsidy initiatives. This includes, EV-charging point developers, small and medium businesses who have invested millions of pounds into shifting to electric fleets for their workers (and will see their operating costs bounce overnight) but will also completely annihilate innovation in the EV-sector in Central London (companies like On.to for example). Currently this measure is something that Westminster EV commuters are very proud of and a clear differentiator for the council, why turn this into one of the most unpopular measure of all time?</p> <p>(c) Finally, the change proposed itself seems too drastic and disproportionate. Why not look to compromise by starting to change prices on the weekend or a limited amount of days to create a transition period for current subsidy-dependent people commuting to Westminster every day? Why not look into specific cases of people fully reliant and dependent on it? Why not filter by models first? Many of us who drive to London often have no other choice but driving to town as living too far</p>	<p>(b) 12A</p> <p>(c) 7I, 3B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>from tube stations or having commute restrictions for personal reasons. This will create a huge impact on our lives, both personal and professional.</p> <p>(d) This is one of the most important decisions that the council may have to do in recent times with significant impact in flows of people and businesses which clearly seems to be totally underestimated. This change should not be taken lightly and would deserve to be more broadly advertised over a longer period of time and discussed with the broader Westminster EV driven community. This change is at risk of becoming one of the most unpopular measures ever taken at the council level since the Park Lane bike lanes!</p> <p>Many thanks for your consideration.</p>	<p>(d) 8E</p>
222.	<p>██████████ ██████████ Email dated 7th February 2024</p>	<p>I am writing to strongly object the current consultation paper which aims to withdraw the concession for electric vehicles allowing vehicles to park up to the bay's maximum stay for a minimum 10-minute payment.</p> <p>(a) This new measure is disproportionately and negatively impacting drivers who have made the choice to drive clean and sustainable vehicles to support and align with the country and government long term ESG and sustainability goals. Although this initiative is inevitable, it comes way too early and with virtually no notice and poor communication around it. EV drivers should at least be granted a few years to adapt to this new norm</p>	<p>(a) 7E, 8E, 5F, 12B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>as many of us would have contracted long lease agreements with car manufacturers precisely for daily commute purposes. The minute this new rule is enforced, it will virtually make it economically impossible for us to park in town on a work day, strongly impacting our professional lives.</p> <p>(b) Further, I can't even begin to imagine the negative impact on the entire EV-driven community of businesses and tech companies that are currently operating in London and flourishing on the back of this amazing subsidy initiatives. This includes, EV-charging point developers, small and medium businesses who have invested millions of pounds into shifting to electric fleets for their workers (and will see their operating costs bounce overnight) but will also completely annihilate innovation in the EV-sector in Central London (companies like On.to for example). Currently this measure is something that Westminster EV commuters are very proud of and a clear differentiator for the council, why turn this into one of the most unpopular measure of all time?</p> <p>(c) Finally, the change proposed itself seems too drastic and disproportionate. Why not look to compromise by starting to change prices on the weekend or a limited amount of days to create a transition period for current subsidy-dependent people commuting to Westminster every day? Why not look into specific cases of people fully reliant and dependent on it? Why not filter by models first? Many of us who drive to London often have no</p>	<p>(b) 12A</p> <p>(c) 71, 3B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>other choice but driving to town as living too far from tube stations or having commute restrictions for personal reasons. This will create a huge impact on our lives, both personal and professional.</p> <p>(d) This is one of the most important decisions that the council may have to do in recent times with significant impact in flows of people and businesses which clearly seems to be totally underestimated. This change should not be taken lightly and would deserve to be more broadly advertised over a longer period of time and discussed with the broader Westminster EV driven community. This change is at risk of becoming one of the most unpopular measures ever taken at the council level since the Park Lane bike lanes!</p> <p>Many thanks for your consideration.</p>	<p>(d) 8E</p>
223.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 7th February 2024</p>	<p>(a) I do not agree with the proposal for Charges for Additional Residents' Permits: Individuals can purchase additional permits for their different vehicles, up to a maximum of three per individual, but with the introduction of an incremental surcharge per additional permit. This will apply to new applications and any permit renewals. Second permits would be charged an additional £50 on top of the price of the permit, and third permits an additional £100.</p> <p>You are effectively rewarding people/families who own more than one car by giving a</p>	<p>(a) 5A, 5E, The City Council replied to [REDACTED] on 8th February 2024:</p> <p>I have been forwarded your email about the Parking Permit Pricing Restructure by Cllrs Butler-Thalassis and Dimoldenberg. I have forwarded your comments on to the consultation mailbox so that they get considered as part of the formal consultation process.</p> <p>However, may I just clarify our proposal regarding allowing additional permits per individual. The £50 second permit and £100 third permit charges would be additional charges on top of the prices of the</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>discount for more than one car. This makes a nonsense of your proclaimed wish to reduce emissions in Westminster. <u>Each vehicle should pay the full price of the permit.</u></p> <p>Also there should be a higher band of 2000+ engines.</p>	<p>permits themselves. We are not offering discounts for individuals' second or third vehicles.</p> <p>The current resident permit scheme allows an individual to have two vehicles on a single permit and the cost of this is the higher charge of the two vehicles. To illustrate with an example, if one is a car of >1200cc and the other a motorcycle, the resident pays the £166 charge for the car as this is the higher of the two (£166 p/a for a >1200cc car vs £57 p/a for a motorcycle). The motorcycle effectively then gets added to the permit free of further charge, but the permit can only be used in one of the vehicles at any given time.</p> <p>Under the new proposal, both vehicles would be charged for: the car dependent upon the banding appropriate to its emissions levels, and the motorcycle at the motorcycle banding rate, plus we'd charge the individual a £50 second permit surcharge.</p> <p>The charges for a second and third permit are therefore in addition to the price of each permit and are intended to act as a proportional deterrent and an acknowledgement that multiple vehicles take up additional on-street space, sometimes where space may already at a premium.</p> <p>I hope this clarifies matters.</p>
	Email dated 18 th February 2024	(b) Please could you pass on my view to the consultation that there should be additional higher	(b) 5E

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		bands for vehicles of 2000 + cc and higher, SUVs and 4 x 4s.	
224.	<p>██████████</p> <p>██</p> <p>Email dated 8th February 2024</p>	<p>I object to the proposal to remove parking concession for EVs in Westminster.</p> <p>The parking concession is a great incentive for car owners to drive electric/hybrid vehicles into the area benefiting the extremely polluted environment particularly in Central London.</p> <p>The purchase cost of EVs are significantly more than that of petrol equivalents. Incentivising the use of EVs in Westminster will play its part in car buyers' decision to commit to helping improve the air quality to residents' and visitors benefit alike.</p> <p>It has not been widely publicised which it should be to encourage the use of more EVs in this area.</p>	7D
225.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 8th February 2024</p>	<p>I strongly believe that the 10 minute concession for fully electric cars should be maintained.</p> <p>Along with the removal of the Cong Charge concession there is reduced incentive to encourage people to switch to electric vehicles.</p>	7D
226.	<p>██████████</p> <p>██</p> <p>Email dated 8th February 2024</p>	<p>(a) I am writing to voice my objection to the rise in parking fees for EV's in Westminster. The incentive to use a zero emission vehicle within the Westminster zone will be largely eradicated due to the increased cost of parking alongside the higher purchase and insurance costs for these vehicles.</p>	(a) 7D

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>WCC should be praised for having taken the incentivised stance it has taken and the net effect is a clear and obvious increase in EV usage in the entire area. Along with that there is a highly noticeable decrease in air pollution and there is a palpable reduction in audible pollution, making the whole area less hostile and quite literally a breath of fresh air.</p> <p>(b) The main beneficiaries of the scheme are residents and local businesses who benefit from the environmental change and also the flexibility and cost saving for a business to run an electric vehicle, these would be removed under the new proposals. Whilst the change is of course in order to add revenue to an area that may be reduced by the increased uptake of EV's, the increase in fees proposed is simply too large a step to take. My suggestion would be to increase further the rates charged on higher emission vehicles and retain a significantly lower rate for zero rated vehicles, which could be half of the proposed rate.</p> <p>(c) There will be an instant impact from the proposed rise of drivers making purchasing decisions based upon cost, this will immediately increase the number of higher pollutant vehicles in the entire area.</p> <p>I do hope that this proposal is not approved in its current form and that further consultation is carried out. As a business owner and resident in the area I think that WCC should think again and continue its</p>	<p>(b) 12A, 8A, 3B, 3C, 7I</p> <p>(c) 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		previous strong environmentally friendly stance.	
227.	<p data-bbox="253 268 454 308">[REDACTED]</p> <p data-bbox="253 344 618 384">[REDACTED]</p> <p data-bbox="253 421 651 461">Email dated 8th February 2024</p>	<p data-bbox="707 276 1382 384">In light of Parisians voting for higher SUV parking fees in a backlash against large cars last Sunday, can the same happen in Central London now?</p> <p data-bbox="707 421 1382 794">Not surprisingly after hearing the results from Paris on SUV parking, many wondered whether it can be done in London. Certainly in Central London boroughs like the City of Westminster and Camden, is the short answer. As TfL does not have charge over all the roads and streets of London in the same way as London Councils do - only the red routes - such an initiative would have to be led naturally by critical Central London boroughs using their parking powers already.</p> <p data-bbox="707 831 1382 1393">Now SUVs are bigger and heavier cars and are quite simply incompatible with our goal of reducing global emissions as well as improving our air quality. The majority of SUVs are petrol-powered and consume about 20 per cent more fuel than the average car. Even if the car is electric or part electric the same sums apply as heavier cars require more energy. Bigger cars don't just emit more, their tyres produce more particulate pollution as well. They also take up more parking space as any pedestrian and cyclists can tell you. And, to make matters worse, SUVs cause significantly more pedestrian fatalities than other cars. So the case for additional parking charging for SUVs is pretty clear cut.</p>	2E

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(b) We also need not go through TfL consultations like done so for congestion charging at the beginning of the century to get it implemented even when the first Mayor of London Ken Livingstone clearing already had a mandate to undertake this from winning the 2000 Mayoral contest.</p> <p>So let us use the present consultation, on Westminster City Councils emission based parking charges to tackle poor air quality, carbon emissions and safety on the roads of the City.</p>	<p>(b) The City Council is obliged to conduct a statutory consultation process on changes to how it calculates and applies tariffs for its parking provisions. The consultation window is a minimum of 21 days.</p>
228.	<p>██████████ ██████████ Email dated 8th February 2024</p>	<p>The Council's proposal to change the residents permit pricing structure is expressed to be "emissions-based"... to "incentivise cleaner less polluting vehicles" and the email giving information about this includes in the reasons for doing this "to reduce air pollution in Westminster" and states that the policy supports the aspiration of improving air quality. Yet the proposals include a proposed charge for electric vehicles which produce no emissions. This change does not therefore fall within the stated objectives of the changed policy. Furthermore, the Cabinet Member Report of 26 June 2023 is based on the policy background of reducing emissions. However it also uses expressions such as "It is felt necessary that all classification off vehicles should be subject to a charge of some sort." and "Everyone pays something for a permit with no permits to be issued free of charge". The Report contains no emissions-based policy basis for these statements.</p>	7A, 8B, 8A

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>Accordingly it would appear that the sole purpose of imposing charges for EV permits would be to raise revenue and that this would be in contravention of section 122 of the Road Traffic Regulation Act 1984. I therefore oppose the proposals insofar as they relate to electric vehicles.</p>	
229.	<p>██████████ ██████████ Email dated 8th February 2024</p>	<p>I would like to make a firm objection to introducing changes to the current parking fees for electric and plug-in hybrid cars in Westminster. Changing the tariff and increasing the fees up to 1800% will dramatically impact workers and other drivers who chose to buy an eco-friendly car. The current discount offers an incentive to choose a lower emission vehicle. If the tariff increases by so much, some people might actually prefer to buy a higher emission car, since this will not make a big difference in parking fees.</p> <p>As an example, a friend of mine, who lives in ██████████, decided to buy a higher-emission ██████████ when it was announced, that the congestion charge will also apply to electric cars from 2025.</p> <p>Looking forward to hearing from you. Thank you in advance for considering my appeal.</p>	7D
230.	<p>██████████ ██████████ ██████████</p>	<p>Objection to Resident's Parking Scheme</p> <p>"The City of Westminster has some of the highest carbon emissions and worst air quality of any national local authority. Therefore, we propose to</p>	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>████████████████████</p> <p>Email dated 8th February 2024</p>	<p>introduce emissions-based charging for both pay-to-park casual kerbside parking and residents' parking permits to incentivise cleaner less polluting vehicles."</p> <p>You mention that the City of Westminster has some of the highest carbon emissions and worst air quality. To solve this issue you suggest increasing the parking permit charges. As a principle I have the following issues with this:</p> <p>(a) When you send an email like this it would have been helpful to show the % of these carbon emissions that stem from residents' cars. I suspect residents' cars make up a very small % of the carbon emissions in Westminster and in fact carbon emissions come from trade traffic, visiting cars, buses, etc. It makes no sense to me that residents (who already pay for this area) should bear the brunt of paying for carbon emissions if they are not emitters!</p> <p>(b) If Westminster is focussed on carbon emissions why is the bus station by Victoria still in the middle of the city - not only are most of the buses that use that station polluting, they also cause traffic chaos which increases the traffic on the roads and causes additional pollution.</p> <p>(c) The constant prolonged road works and poorly designed cycle lanes cause traffic build up which increases carbon emissions. For example, there is constantly a traffic jam on Park Lane due to</p>	<p>(a) 11B, 7A</p> <p>(b) 10B</p> <p>(c) 10B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>the cycle lane. There are never any cyclists in that cycle lane as they (myself included) prefer to use the cycle lane inside Hyde Park.</p> <p>(d) A few suggestions for reducing carbon emissions:</p> <ul style="list-style-type: none"> • Demand that office buildings are carbon neutral (and ask office buildings to turn lights off at night which would also improve air pollution) • Move the bus station and other heavy transport hubs • Demand that all tourist/tour busses in the city be electric • Crackdown on idling of cars • While it is detrimental that listed buildings are kept under strict planning control (these buildings are so important to the city) you should encourage energy efficiency in buildings • Crackdown on antisocial driving (to this point I am also amazed that Westminster does enforce big fees on cars/motorcycles that are set up to make a lot of noise) • Tax any cars that service the building industry <p>In summary, I am upset to find that you as a council think the appropriate way to solve your carbon emission problem is by taxing the people that live here rather than the people who merely come to use the services of Westminster.</p> <p>Visitors to the city who cause an enormous amount</p>	<p>(d) 10B</p>

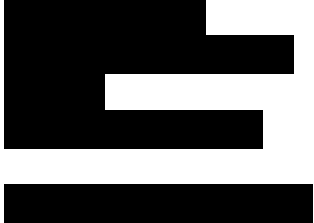
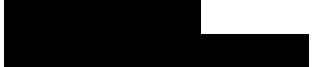
APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		of carbon emissions and office spaces who use the city should be taxed before the local residents who already pay a lot to live here.	
231.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 9th February 2024</p>	<p>The CO2 emissions stated in the message for Bands 3 and 4 are incorrect in that emission level 131 is included in both Bands whereas the web site states Band 3 -- 91-130 and Band 4 - 131 – 150. This is confusing and an avoidable error.</p> <p>For information an action, please.</p>	<p>1B, WSP replied to [REDACTED] on 12th February 2024:</p> <p>Thank you for bringing this error to my attention. I have forwarded your email to the City Council so that they are aware. I can confirm that the information on the City Council's website and in its public notice is correct (https://www.westminster.gov.uk/parking/changes-how-we-charge-parking).</p>
232.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 9th February 2024</p>	<p>I am writing to provide a comprehensive explanation of my strong opposition to the proposed emissions-based charging scheme for parking in Westminster, particularly concerning residents' permits.</p> <p>(a) While I recognise the urgent need to address carbon emissions and air quality in central London, I firmly believe that the proposed approach unfairly penalises residents who already bear a significant financial burden in living in this area.</p> <p>(b) To contextualise my opposition, I would like to highlight some pertinent statistics regarding vehicle emissions in Westminster. While residents undoubtedly contribute to local emissions, it is crucial to note that a considerable portion of pollution stems from vehicles that enter the</p>	<p>(a) 3C</p> <p>(b) 11B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>borough daily, including those belonging to tourists, delivery services, and commuters from outside the borough.</p> <p>According to recent data analysis, residents' vehicles constitute only a fraction of the total vehicles registered within Westminster. The majority of emissions originate from vehicles associated with commercial activities, tourism, and commuting. Ignoring this disparity and solely targeting residents for emissions-based charges is inequitable and fails to address the root causes of pollution in the area.</p> <p>(c) Furthermore, many residents such as myself have already taken proactive steps to reduce their carbon footprint by opting for cleaner transportation options, such as hybrid or electric vehicles. However, the proposed scheme overlooks these efforts and imposes blanket charges that do not differentiate between environmentally friendly vehicles and those with higher emissions.</p> <p>(d) Additionally, the proposal to introduce surcharges for multiple permits per household disproportionately affects families and individuals who rely on multiple vehicles for work, caregiving responsibilities, or other legitimate purposes. This punitive approach risks exacerbating financial strain on already vulnerable households without effectively addressing the broader issue of air quality in Westminster.</p>	<p>(c) 7A</p> <p>(d) 5D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(e) Instead of burdening residents with additional charges, I urge the council to explore alternative strategies that prioritise fairness and effectiveness. This could include implementing targeted measures to reduce emissions from commercial activities, incentivizing the adoption of electric vehicles through subsidies or tax incentives, and investing in sustainable transportation infrastructure to encourage modal shifts away from private car usage.</p> <p>In conclusion, while I appreciate the council's commitment to improving air quality, I strongly believe that the proposed emissions-based charging scheme requires reconsideration to ensure that it aligns with principles of equity and sustainability.</p> <p>Thank you for considering my detailed perspective on this matter.</p>	(e) 10B
233.	 Letter dated 28 th January 2024	<p>I have received your e-mail explaining that you intend radically to increase the cost of parking at our residence in Pimlico. The message is rendered even more irritating by the hypocrisy with which this extra tax is justified.</p> <p>I deeply resent this dis-honest tax increase and will always do my very best to make sure Westminster is not managed by cheats and liars.</p>	3C
234.		(a) Absolutely wild to hear this is actually going through, and that by 'doing the right thing' the	(a) 7D

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 9th February 2024</p>	<p>punishment is increasing costs from £0.96 per 4 hours to £18.48 for 4 hours? On top of the congestion charge for EV vehicles being taken away in December 2025 I believe. This is a great way to get commuters to back into their ICE cars, there is literally zero saving on having an EV car that isn't a company car, and even then what's the point – I am sure you will try and stop those benefits soon enough.</p> <p>(b) Central London's perceived excellent transportation is littered with delays, strikes, violence which is all too apparent to those actually doing the commutes. Oxford Street is deserted of life and filled with tax dodging money laundering candy shops. You are over reliant on tourism and the streets and roads are filled with bikes and scooters thrown to the floor like old newspapers.</p> <p>(c) A very damaging move to the EV car community. Many I am sure will now happily pay the CC and bring their actual preferred ICE cars into town and save their company(s) the huge costs of a leasing an EV. Will make London once again a much more exciting place to see nice vehicles at least...</p>	<p>(b) 6D, 10E</p> <p>(c) 7D</p>
235.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 9th February 2024</p>	<p>(a) Currently I can park my zero emissions EV in the location of [REDACTED] at a meter and pay for four hours a total of £1.32.</p> <p>From the 18th March at the same location for the same period the charge will be £18.42.</p>	<p>(a) 3D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>From a rough calculation that is an increase of some 1,300 %.</p> <p>How can such an increase be in anyway shape or form be considered to be in anyway reasonable and proportional.</p> <p>(b) It could be argued that Westminster Council having identified the number of EV motorists, and realising that they are probably a captive audience have decided to take advantage of the situation, and in a bid to 'cash in' have decided to inflict on the driver a wholly inordinate charge increase because they simply can! The driver who had bought an EV to benefit from the low parking charge will have no option but to pay.</p> <p>I know of no other sector where a service provider can impose such an out of proportion increase on a consumer.</p> <p>Laughably as I understand it, this 1,300% increase is being described by yourselves as an attempt to encourage the uptake of EV ownership!</p> <p>I would welcome your comments as to how you feel this is remotely acceptable.</p>	<p>(b) 8A, 7E</p>
236.	<p>██████████</p> <p>████████████████████</p>	<p>I object to the proposed changes to the car parking permit fees. This is a service provided by the Council to its residents and we pay the costs of you providing the service. What is the legal basis on</p>	<p>(a) 8B, 8F, 8A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	Email dated 9 th February 2024	which you are raising additional tax on your residents and what will the tax be spent on? If you need to raise more money through taxation, you should be open and transparent about this by raising the money through Council Tax and informing your tax paying residents what you are spending the money on.	
237.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 9th February 2024</p>	<p>I totally object to the council's proposals to increase prices for residents parking on all cars, especially electric cars.</p> <p>I think this is an unacceptable and unreasonable demand, especially when the council continues to fail residents in providing enough parking spaces within Westminster.</p> <p>Please DO NOT proceed with such price restructuring.</p>	<p>3C</p> <p>The residents' parking scheme does not guarantee a parking space or that an available parking will be close to a resident's home address. This information is provided to permit holders in the terms and conditions when applying for a permit.</p>
238.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 9th February 2024</p>	<p>The current charge of a maximum 10 minutes for an EV was an important factor for me to move to a zero emissions vehicle.</p> <p>I can see that greater EV take-up and the environmental benefit is in everybody's interest.</p> <p>(a) I also understand more EV's reduces parking income for the council but there is a balance to be had to continue to encourage more EV's. I appreciate the proposed charges will be less for EV's than other vehicles. but I believe the sudden imminent change from the current charge to much</p>	<p>(a) 7D, 8E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>higher amounts would be unreasonably fast.</p> <p>(b) May I propose that the change is phased in, beginning with 50% of the new tariff being charged for the next 12 months when the full tariff would be introduced.</p> <p>I think this would be a fairer and more equitable situation than your current proposed huge increase and would help continue to encourage the switch to EV's.</p>	<p>(b) 5F</p>
239.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 9th February 2024</p>	<p>(a) The stated goal is to incentivise cleaner, less polluting vehicles, however, your approach is to remove incentives to buy electric cars by taking away permit/parking discounts. I am aware of people who have bought electric cars to drive into London as it makes financial sense, but given that there are going to be parking/driving costs anyway, why would you buy a new car? We have seen that across the board EV sales are flatlining. The intended aim seems disconnected from the proposals, and I think you are aware of this by having a short window for responses, and asking for emails rather than sending out a survey. Further, you seem to have already made up your mind about the parking rates for electric cars by having a date for the planned removal of the discounts, March 18.</p> <p>(b) My general response is that this is absolutely the wrong approach to the problem. The main cause of pollution is the traffic in Central London,</p>	<p>(a) 7D, 8E, 8G</p> <p>(b) 10B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>which is primarily caused by the huge amounts of roadworks all over the city, road closures, bad driving, lack of traffic enforcement, the large increase in booked cabs which are constantly circling and the introduction of bicycle routes on key arteries such as Regent's Street forcing stopping buses and cars onto one lane. It is clear that traffic is no longer flowing as it should do, and throw in the 20 mph enforcements, we have the slowest traffic of any key European city. It is clear, no one who drives in London actually has any influence on road measures.</p> <p>(c) Increasing the price for pay-to-park adds additional cost to any business hiring tradespeople to do any work – effectively a tax on Central London businesses. Already companies will not come into London due to congestion charge, ULEZ and parking – adding £30-100 to the cost of any works – and this will contribute to fewer. You have proposed tradesperson cards, but could you not allow businesses to have some cards for reduced parking?</p> <p>(d) There is not enough parking as it is. For the past month and a half I have been contacting the various non-docking bike companies to complain about bikes being left in resident parking bays. Please see the attached photo – this was last week outside [REDACTED] - almost all the parking bays were taken up with lime bikes. How can you justify price hikes when the bays are being taken away from residents? And residents</p>	<p>(c) 12A</p> <p>(d) 10E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>have absolutely no recourse.</p> <p>(e) You should be encouraging people to use public transport where possible but you have cut/changed numerous bus routes – there is now only one bus from Selfridges to the West End when there used to be four.</p> <p>(f) You are pricing people out of London. Not everyone has access to good public transport, and for some people maybe with disabilities, young children, older relatives, a car might be the easiest and cheapest form of transport, but you are now pricing them out of their capital city.</p> <p>(g) How are you going to put in place the pricing by emissions for pay-to-park? On what platform? How are you going to manage the car data? Who will be managing it? You are also excluding those who do not have a smart phone and/or credit/debit card from parking in London. Have you done an equality impact assessment on the proposals? Have you done a data impact assessment? Are you expecting everyone who wants to park in central London have a further app to be able to do so?</p> <p>(h) It is clear from the way that this survey is being handled, you are aware that you will have little support over this. Westminster Council is the richest council in the Country, if you need more money, be transparent. This proposal is affectively a further tax on drivers but with no carrots to change how people access London – no increase</p>	<p>(e) 6D, Transport for London is responsible for bus routes and services, rather than Westminster City Council and concerns about services should be directed to that authority.</p> <p>(f) 3B</p> <p>(g) 4B</p> <p>(h) 8A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>in public transport, safe road measures etc- and is wholly exclusionary. The country is becoming very intolerant of people who do not want to have every transaction on an app, where some company takes much more information than they need, for something that used to be relatively simple, and further does not allow for situations where people have no access to a phone/bank card for any reason.</p> <p>(i) If you want to increase residential parking permits / introduce a charge for additional cars, that is one thing, but the proposals to remove incentives for EV, and to change how pay-to-park operates is ill thought out, and will have a far greater impact on local business than you are considering (particularly, as the businesses as already suffering from tube / train strikes).</p>	<p>(i) 7D, 11A</p>
240.	<p>██████████ ████████████████████ Email dated 9th February 2024</p>	<p>I wish to lodge a concern that electric bikes and electric scooters are not covered by this scheme. Surely they are not emission free?</p>	10E
241.	<p>██████████ ████████████████████ Email dated 9th February 2024</p>	<p>Only one objection/ comment... if the Council is serious about improving air quality then the new parking charges for 100% electric vehicles (both on street and permit holders) should remain at the current rates.</p> <p>With other charges increased as planned, this will widen the cost gap to more polluting vehicles and</p>	7D

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		provide a larger incentive to go-green.	
242.	<p>██████████ ████████████████████ Email dated 9th February 2024</p>	I support the proposals to introduce emissions-based charging, although I think the proposed charges are still too low. I would also support significantly higher charges for larger/heavier vehicles, such as SUVs.	2E
243.	<p>██████████ ████████████████████ Email dated 9th February 2024</p>	<p>(a) There is nothing bad about owning or parking a car in Westminster; the only bad thing is actually driving a car in Westminster. We need to come up with a novel way to reward car owners who leave their car parked, provided they don't drive it. A carrot, not a stick.</p> <p>There are many ways, e.g.:</p> <p>(b) Free road tax on days or weeks that it is not driven at all.</p> <p>(c) A free day of any parking charges following a week of no driving. The ideas are endless.</p>	<p>(a) 7B</p> <p>(b) As road tax is set by the national government and collected by the DVLA, rather than Westminster City Council, changes to how the levy is managed is outside the scope of this proposal.</p> <p>(c) The difficulty here would be how to manage such a scheme. If a significant proportion of drivers chose to take their free parking day on the same day, there would likely be many frustrated drivers. It is also not clear what would happen if a driver needed to use their car on a "no driving" day.</p>
244.	<p>██████████ ████████████████████ ██████████</p>	<p>(a) I am writing to you following the disappointing reports that Westminster Council is considering change the parking charges system which will increase the cost of parking an electric vehicle with zero CO2 emission by 1800%!</p>	(a) 3D

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>Email dated 9th February 2024</p>	<p>The incentive the council currently has in force which allows electric vehicles to pay for only 10 mins in a pay and display bay is one of the main reasons I switched to an EV more than 2 years ago.</p> <p>(b) My office address ([REDACTED]) allows me to drive to work with my EV and park near the office. By removing this incentive you are sending mixed and confusing messages that the Council does not now prioritise reducing pollution from cars and does not care about encouraging people to change their cars to EV's that have ZERO carbon emissions!</p> <p>Why would you do that?</p> <p>(c) With the new system that has been proposed it is basically telling drivers that it doesn't matter to the Council what car you drive and that they do not care about incentivising people any more to switch from Diesel or Petrol to EV's and instead they prefer to "trick" people into buying an EV car and then change the parking charges to profit hugely from suddenly changing the rules!</p> <p>The way this is being done is borderline deceitful as the incentive currently in force seems now to have been offered as a carrot for people to bite and now you are taking advantage of all those environmentally conscious people and asking them to pay you as if they do not own an EV!</p>	<p>(b) 7D</p> <p>(c) 7D, 7E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(d) I am obviously not the only one who has this opinion and there are many businesses with EV's and executives who will just as well drive into work with their Diesel or Petrol car (or van) since the difference is minimal in the cost of parking.</p> <p>(e) I was in fact considering changing my other car to an EV but will now re-consider this decision on the basis that the cost of electricity has increased and if there are no longer incentives (parking and congestion charge) then why bother? The equivalent EV's are in any case a more expensive purchase with the Government subsidies now reduced or not applicable (depending on the price).</p> <p>I strongly urge you to re-think this proposal which is clearly an attempt to generate extra revenue and instead find ways to promote a greener and cleaner environment and economy. How else will the UK reach its global emissions targets if they stop people from wanting to change to EV's??</p>	<p>(d) 12B</p> <p>(e) 7D, 7E</p>
245.	<p>██████████ ██████████ Email dated 9th February 2024</p>	<p>Strongly object to high rise in parking permits in Westminster. The Mayor is trying to cripple all vehicle users which will have an adverse effect on both private residents and tradespeople, increasing the cost of living yet again. with a trickle-down effect on all trades into the private sector. How does the Mayor expect residents and tradesmen to carry out their daily lives and their businesses., especially as he has caused TFL to reduce their</p>	<p>12A, 3E, 6D</p> <p>The introduction of emissions-based charging for pay-by-phone and residents' parking places has been proposed by Westminster City Council rather than the Mayor of London, who represents Transport for London.</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		bus services across the city?	
246.	<p>██████████ ████████████████████</p> <p>Email dated 9th February 2024</p>	What right have you to increase the parking charges.	8B
	<p>Email dated 9th February 2024</p>	<p>IMHO you should be charging more. There is no reason why anyone in London should own a car and if they do, they should pay for it. Let's go for the full monty and make their life as miserable as possible. A speed limit of 10MPH and a road tax of 10K</p> <p>That should keep the other side happy.</p> <p>Luckly, I don't live in London any more. Poor sods</p>	2E
247.	<p>██████████ ████████████████████</p> <p>Email dated 10th February 2024</p>	<p>I wish to raise a complaint about the proposed changes to parking fees within Westminster, specifically that of kerbside parking (non resident)</p> <p>Within the proposal it is made clear that the reason for changes is due to Westminster's high carbon emissions and bad air quality. Whilst actions should definitely be taken to improve this, the actions that you are taking are penalising drivers of electric vehicles that emit zero Carbon. The cost to park for example for an electric car in zone A will rise from 70p for 4 hours to almost £12.72- a 18x increase. There is no justification for this outrageous and over the top price increase based on the criteria</p>	7A, 3C, 8A, 12E

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>you set out in the consultation and that i mention above, it is just a money making scheme. People in these vehicles currently emit zero carbon today and it will be zero carbon tomorrow. They should not be punished with such an increase. Diesel vehicles that emit <=90 CO2 emissions will actually see a reduction in the price they pay and even the biggest increase is c1.5x current pricing, completely unaligned with the example 18x I give above</p> <p>Whilst the intention behind this is a good one, the fee structure for electric vehicles is a complete joke and such a price rise is completely unjustified based on the reasons given</p>	
248.	<p>██████████ ██████████ ██████████</p> <p>Email dated 10th February 2024</p>	<p>I am a resident of ██████████</p> <p>I object to the increase in parking permit charges. It is ridiculous to increase the cost of moped charging.</p> <p>It is also unfair to treat a moped as a second vehicle requiring a separate permit. A car and a moped can't be driven at the same time so it doesn't make sense to charge an additional premium for a second permit.</p>	11C, 5D
249.	<p>██████████ ████████████████████</p> <p>Email dated 10th February 2024</p>	<p>I strongly object to this senseless tax increase. It has nothing to do with congestion or air pollution. It is evidently just another way for this now inefficient labour run council to raise money to waste on some pointless project.</p>	8A, 8F

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
250.	[Duplicate email: removed from report]		
251.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 10th February 2024</p>	<p>I am writing to strongly object to your proposal to increase the amount paid for parking permits. This is merely a cynical attempt at raising more money and has nothing to do with air quality. If the air quality is as bad as you claim then clearly the Mayor's ULEZ scheme is not working. We as Westminster residents are already bearing the cost of this unsuccessful scheme and yet now you want to penalize us again.</p> <p>I object strongly to this scheme and will work with others to expose it as the ploy it clearly is.</p>	8A, 11A
252.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 10th February 2024</p>	<p>I own a hybrid vehicle and currently have free on-street parking in Zone F.</p> <p>I fully support the proposed measures which ensure that all vehicles pay, and that the heaviest polluters bear the greatest burden.</p>	2A
253.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 10th February 2024</p>	<p>I totally object to the fact that there are potentially higher costs being planned by the Westminster Council for Resident Parking Permit Holders. Yet again, this Labour Council is putting additional income as a priority over residents who drive a car. Not only is it not clear where these profits will be directed but not for the benefit of resident drivers I am sure. Not only that, but many of the resident parking bays have already been sacrificed and become pay as you go parking bays for anybody</p>	<p>8A, 8F</p> <p>Comparing mapping data between February 2020 and February 2024, there has been a 3.9% decrease in overall residents' parking in the Bayswater and Lancaster Gate areas compared to a 2.8% decrease in pay-by-phone parking. This is in contrast to the Westminster-wide figures which show a 1.3% overall decrease in residents' parking and a 4.8% overall decrease in pay-by-phone parking.</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>who happens to be in the area and wants to park. So, it is not designed to reduce car driving in the area but more about making yet more profit and offering a lot less residents parking spaces at a higher annual cost! This is yet more bad news from this local authority!</p>	<p>However, it should be noted that there is a greater proportion of residents' parking in Bayswater and Lancaster Gate (approximately 6 metres of residents parking for every 1 metre of pay-by-phone parking) compared to the Westminster-wide average (approximately 4 metres of residents' parking for every 1 metre of pay-by-phone parking). It should also be noted that the residents' parking scheme does not guarantee a parking space or that an available parking will be close to a resident's home address. This information is provided to permit holders in the terms and conditions when applying for a permit.</p>
254.	<p>██████████ ████████████████████ Email dated 10th February 2024</p>	<p>As a resident in Westminster since ██████, living in private rented accommodation, I am experiencing my now fixed state pension income and savings being eroded by constant hikes in living costs, from my rent, cost of living, and a 2004 registered car of my own is now becoming impossible to sustain. I increasingly feel targeted, threatened, and dismissed as a resident in Westminster. I believe I should not be charged above the annual road tax I already pay, in addition to the levy on the cost of petrol per litre that is already built in. These taxes are already enough to sustain roads, repairs, and every other cost of maintaining a road and highways infrastructure, but these funds are siphoned off before they meet their original objective. I need a car. My family away from London is not easily accessible by public transport. I can't continue to afford a car if antisocial targeting of residents who own a car are being overly</p>	3E, 7L, 3B, 0A

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		burdened in this way. My objection is that I am trying to protect and afford my home and Westminster and the Council seem intent on forcing me to live a subsistence existence. It is not sustainable. Do not increase parking charges. The Council receive enough existing revenues, if properly managed, for the good of residents in Westminster. This proposal is to meet political ideologies that do not serve me or the majority of people like me in Westminster.	
255.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 10th February 2024</p>	<p>(a) Our car will incur the diesel surcharge when the parking price increase comes into effect. Although able to afford a new car we have thought carefully about buying because the carbon footprint of a new car, manufacturing, transporting, etc., is substantial. An electric vehicle even more so.</p> <p>(b) Highly concerned about the environment we made a decision to drive our car at most twice a month. Westminster has not cared to consider car use. This is what will improve the air quality in the borough.</p> <p>(c) To further improve the air quality, I would suggest a better infrastructure of public transportation. Over the last few years our neighbourhood's bus services have been cut, and cut and cut.</p>	<p>(a) 9A</p> <p>(b) 7C</p> <p>(c) 6D</p>
256.	<p>██████</p> <p>████████████████████</p>	Please do not change the parking prices. In addition, please make your parking permit process more user friendly.	0A. It is recommended that suggestions on how to improve the permit application / management process are sent directly to the City Council's

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	Email dated 10 th February 2024		Parking Services via General Enquiries page at the following address: https://www.westminster.gov.uk/parking/contact-parking-services
257.	[REDACTED] [REDACTED] Email dated 10 th February 2024	We pay more than enough to park, to drive in the borough and the staggering fines we incur for the slightest parking error - there is no justification	0A, 3D
258.	[REDACTED] [REDACTED] Email dated 10 th February 2024	i have an electric car i was thinking of replacing it with a new one as it is 4 years old the incentive to drive electric is so diluted i will have to look at petrol again	7D
259.	[REDACTED] [REDACTED] Email dated 10 th February 2024	(a) If it is indeed WCC intention to reduce vehicle exhaust related air pollution, it makes no sense to increase resident parking permit charge for EV. The current zero cost is the only right approach and keeping zero charge for EV parking permit must be ultimate goal of the local government if it cares about local residents. (b) Any increase cannot be possibly justified, especially not at the short notice like this. I presume it is obvious for the local government that given higher cost of EVs in comparison with conventional cars, EV owners bear higher costs and thus should	(a) 7D (b) 8E, 7D

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>be supported.</p> <p>Please act in according to your declarations quoted below.</p>	
260.	<p>██████████ ██████████ ██████████</p> <p>Email dated 10th February 2024</p>	<p>(a) I do not agree with the increased parking charges. The amount proposed is excessive and I believe have nothing to do with steps towards a cleaner future.</p> <p>(b) I am not opposed to “active travel” but we do believe these changes are part of an anti-car agenda engrained in the Labour administration. The price hike is clearly punishing vehicle-owning residents in a direct way. I only use the car travelling to work outside London. Even this has now been reduced as I have recently retired. I am using public transport most of the time commuting around London. The car is only being used to do the weekly shopping.</p> <p>(c) I also replaced my car three years ago with the latest version in line with the CO emission. My car is therefore generating the acceptable level of CO emission.</p> <p>(d) In conclusion, the council is proposing the increase without the evidence to support the proposal. They need to provide evidence to back up their decisions (i.e. to reduce congestion), Labour brazenly admitted they haven’t got the relevant data to prove this. Nothing should go ahead until this is dealt with properly.</p>	<p>(a) 3C</p> <p>(b) 11D, 7C</p> <p>(c) 7G</p> <p>(d) 11A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
261.	<p>██████████</p> <p>██████████</p> <p>Email dated 11th February 2024</p>	<p>I agree with a move to emissions based charging.</p> <p>(a) I oppose the imposition of the proposed charges without a transition period.</p> <p>(b) The objective of the policy must be to encourage residents to make better choices when changing their vehicle, NOT to penalise past decisions made in the light of prevailing public policy at an earlier date.</p> <p>(c) In most areas there is a lack of convenient on-street electric vehicle charging points. This must be addressed if residents are to feel confident enough to acquire a plug-in vehicle. Existing charging points are frequently taken by non-resident vehicles. Before this policy can be effective there is a need for more charging points, with some reserved for residents only - ideally unlocked by a fob or card issued with the parking permit.</p> <p>(d) Most people today acquire vehicles on finance agreements with a fixed term and penalties for early settlement (inevitably higher charges than those proposed for parking permits), making a change of vehicle effectively impossible before the end of their agreement. Those who buy vehicles for cash will tend to be either the very wealthy residents of the city, whose behaviour will not be influenced by this policy, or the poorest residents who are more likely to drive older vehicles with higher emissions and without the resources to</p>	<p>(a) 8E</p> <p>(b) 5H, 7E</p> <p>(c) 6A</p> <p>(d) 3A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>acquire a vehicle in a lower band.</p> <p>Accordingly, this change will have extremely limited impact on emissions in the short term, whilst imposing a disproportionate penalty on the poorest residents.</p> <p>(e) Indeed the policy is likely to fail in its objective of nudging behaviour in the longer term too. By imposing the new charges now, residents will become accustomed to the new level, such that the incentive to move to a lower band when choosing a new vehicle will be much reduced.</p> <p>(f) There are three better ways to encourage better vehicle choices:</p> <p>(i) Imposing the new charges only on a change of vehicle will have the maximum impact.</p> <p>(ii) Announcing the changes to take effect in, say, 3 years' time would have a similar maximum effect, but not raise additional revenue in the short term that would arise under 1. above.</p> <p>Phasing-in the changes over the period of a typical finance agreement (4 years) will be better at nudging behaviour than the current proposal and give residents already suffering from price inflation across the board a chance to adjust.</p>	<p>(e) 7D</p> <p>(f)</p> <p>(i) 5H</p> <p>(ii) 5F</p>
262.	██████████	I object strongly to the Council raising Resident Parking fees. To what end? How much	3C, 8F

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	██████████ Email dated 11 th February 2024	more money is the Labour Council going to penalise motorists? Where is the additional money going?	
263.	██████████ ██████████ Email dated 11 th February 2024	(a) I heard Westminster is looking into introducing exorbitant charges for residents permits and I am writing to request what are the reasons for this in this craze of everything go up in the madness of cost of living crisis we are living in...!!? (b) Is there any reasons for this hike and has these reasons been corroborated by any evidence of data?	(a) 3E (b) 0A, 11A
264.	██████████ ██████████ Email dated 11 th February 2024	I object to the permit increases as I recently changed my car from a diesel to a petrol hybrid for two reasons 1. The environment and 2. A possible long term cost saving such as a free parking permit. The EV I bought was more to buy than a new diesel car, more to insure, but at least I had a free parking permit. To be frank when looking to change car again I probably won't buy an EV as there are no incentives to do so. Very disappointed with the council in this regard and very short [sighted]!	7D, 7E
265.	██████████ ██████████ Email dated 11 th February 2024	I have the following objections about the proposals on the proposed Tariff and Permit Pricing Restructure. (a) The reasons given for this proposed change in policy is to incentivise cleaner less polluting vehicles and to explain why. There is no mention in the explanation as to why zero emission vehicles	(a) 7A

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>such as electric cars are singled out for new increased tariffs, as they certainly do not fit into the explanation of the new policy.</p> <p>(b) If the incentive is to encourage the use of electric vehicles why are they subject to additional charges? The effect is to discourage the use of such vehicles, which is contrary to the policy to promote them.</p>	<p>(b) 7D</p>
266.	<p>██████████ Belgravia Residents Association ██████████ Email dated 11th February 2024</p>	<p>On behalf of the Belgravia Residents Association I should like to make the following suggestion to the proposed hike in parking charges vis a vis local residents.</p> <p>(a) For many years the BRA have had members come forward complaining about the restrictive zoning and felt a better model would be as exists in RBKC.</p> <p>(b) Many members have contacted us over the increases, for they see the proposed charges as being unreasonably high in order to raise circa approx six Million Pounds as we are informed would be the case.</p> <p>Whilst appreciating the cost of services escalate and there is always pressure on budgets we feel in this case the hike in charges is overly excessive.</p> <p>Perhaps a 25% increase with reference 8056/PJ to compensate but not 77% as mooted.</p>	<p>(a) 10C</p> <p>(b) 3C</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(c) However if the council insisted the need for such a vast increase and could substantiate the increase by indicating where these funds would be distributed then by giving something back would in essence make such an increase more palatable as suggested below.</p> <p>(d) We would appreciate if like RBKC the zoning of having a specific area for Residents parking can be amended in so much as that any resident in Westminster with a valid permit can park anywhere in the Borough displaying a Residents parking sign.</p> <p>(e) By so doing the motorist/resident who is in fact a sitting target and has little redress on such matters, would in fact see some benefit from the increases proposed, and would demonstrate an olive branch to residents seeing that the council actually cared, and were being proactive and not merely raising charges wherever they could.</p> <p>I hope you find this e mail constructive and would be only too pleased to assist further if you required our input.</p>	<p>(c) 8F</p> <p>(d) 10C</p> <p>(e) 10C, 8A</p>
267.	<p>██████████ ██████████ ██████████</p> <p>Email dated 11th February 2024</p>	<p>(a) I wish to express my extreme disappointment with Westminster CC, who appear to be developing legislation to penalise the poorest car owners even more.</p> <p>(b) As a Westminster Zone A resident I have been paying £12.50 a day to use my car in Westminster (and beyond) for over two years and</p>	<p>(a) 3A</p> <p>(b) 7B, 3A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>thus cannot afford to use it much. It appears that now I am going to be penalised for NOT using it (i.e. simply leaving it parked). This is grossly unfair to the less well off.</p> <p>(c) Richer residents simply buy huge Chelsea tractors that block the local roads and are too large for the parking bays, but Westminster policies appear to encourage these practices.</p> <p>(d) Currently, the owners of perfectly serviceable and reliable cars are being offered a few thousand pounds and expected to fork out tens of thousands more to buy an electric car that most residents cannot even charge.</p> <p>I sincerely hope that Westminster CC will stop penalising poorer residents.</p>	<p>(c) 7H</p> <p>(d) 3A, 6A</p>
268.	<p>[Name not provided]</p> <p>████████████████████</p> <p>Email dated 11th February 2024</p>	<p>(a) Many recent EV buyers have based their choice of vehicle in significant part on the very advantageous parking concession currently in place in Westminster (10min tariff for max stay). It seems unfair to remove it and replace it with a drastically higher cost for these owners after they have purchased their vehicle, in the rather short proposed timeframe / notice.</p> <p>(b) Secondly, the new scheme being drastically less favorable to EV's, if the goal is to increase the proportion of EV's circulating in Westminster then this seems like a step backward that will have an adverse impact.</p>	<p>(a) 7E, 8E</p> <p>(b) 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
269.	<p>██████████ ██████████</p> <p>Email dated 11th February 2024</p>	<p>I am writing to provide objections to the proposed changes to the Emission Based Charging and provide the grounds for my objections.</p> <p>As a London resident, I am very supportive of schemes that incentivise residents to use lower emissions vehicles and penalise users of older and higher polluting vehicles.</p> <p>(a) However, your proposed scheme fails to meet its stated objectives by increasing the parking costs for lower emissions vehicles and decreasing the costs for higher emissions vehicles, as further explained below.</p> <p>At a time where EV sales in the U.K. have been slowing down (EV sales represented 16.5% of new vehicle sales in 2023, down from 16.6% in 2022 according to SMTT) reversing incentives for electric vehicles is a terrible approach, especially where the objectives of this policy is to improve air quality in Westminster Council.</p> <p>I have 3 main objections to this proposal:</p> <p>(b) The new pricing bands will decrease parking costs for older diesel vehicles while increasing costs for EVs:</p> <p>(i) According to the new proposed pricing, a large number of Diesel vehicles which before fell into the highest band (Diesel vehicles registered</p>	<p>(a) 7D</p> <p>(b) 12E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>before 2015) will now fall under cheaper pricing bands.</p> <p>(ii) A few examples based on 4 hours stay in Zone A:</p> <ul style="list-style-type: none"> <input type="checkbox"/> 2014 Audi A4 Allroad TDI CO2 161 g/km <ul style="list-style-type: none"> <input type="checkbox"/> Previously: £25.32 <input type="checkbox"/> Now: £21.84 (14% cheaper) <input type="checkbox"/> 2013 BMW 520D CO2 154 g/km <ul style="list-style-type: none"> <input type="checkbox"/> Previously: £25.32 <input type="checkbox"/> Now: £21.84 (14% cheaper) <input type="checkbox"/> 2012 Ford Mondeo 2.0 Duratorq CO2 129 g/km <ul style="list-style-type: none"> <input type="checkbox"/> Previously: £25.32 <input type="checkbox"/> Now: £20.00 (21% cheaper) <input type="checkbox"/> 2010 VW Passat 1.9 TDI CO2 137 g/km <ul style="list-style-type: none"> <input type="checkbox"/> Previously: £25.32 <input type="checkbox"/> Now: £20.00 (21% cheaper) <p>(iii) According to the new proposals, parking costs for an EV will increase by approximately:</p> <ul style="list-style-type: none"> <input type="checkbox"/> EVs: 1,700% (17x) based on a 4h stay <input type="checkbox"/> PHEVs: 1,980% (20x) based on a 4h stay <p>(iv) The policy objectives is to incentivise drivers to switch to lower emitting vehicles, yet higher emitting vehicles are seeing discounts rather than pricing increases</p> <ul style="list-style-type: none"> <input type="checkbox"/> Lower emitting petrol vehicles (Band 3) will see an increase of around 18.5% versus the current pricing bands, while highest emitting vehicles (band 5) is a mere 0.6% above the current highest band 	<p>(iii) 3D</p> <p>(iv) 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p data-bbox="779 197 1368 416"> <input type="checkbox"/> In addition and as mentioned before, a large number of older diesel vehicle which before were classed at highest emitting will now benefit from a pricing decrease of 15-20% with very few seeing an increase of less than 1% </p> <p data-bbox="703 459 1346 603">(v) While the principle of having pricing by emissions is a good one, the way the pricing has been segmented is completely wrong and clearly promoting the opposite of its objectives</p> <p data-bbox="703 646 1301 715">(c) Pricing of Hybrid Vehicles vs Electric Vehicles</p> <p data-bbox="703 719 1361 863">(i) PEHVs, while being among the lowest polluting vehicles category, still create significant emissions, with the category extending to vehicles emitting up to 90g/km which is still substantial</p> <p data-bbox="703 868 1361 975"> o To put this figure in comparison, some lower emitting petrol vehicles (non hybrid) are just above 100g/km </p> <p data-bbox="703 979 1357 1161">(ii) While I believe it's important to incentivise lower emissions vehicles, the pricing for this class is almost the same as zero emission EVs which does not make the adoption of a zero emission vehicle attractive</p> <p data-bbox="703 1166 1317 1278">(iii) There should be a strong reduction in EV pricing which should be subsidised by higher pricing for PEHVs and higher pollution vehicles</p> <p data-bbox="703 1283 1379 1428">(iv) Since EVs only represent 5% of the total vehicles on London roads (according to UK Gov statistics as of Q3 2023), it should be possible to maintain the current 10 minutes pricing for EVs only</p>	<p data-bbox="1406 459 1541 491">(v) 12E</p> <p data-bbox="1406 646 1541 678">(c) 12E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(excluding PHEVs)</p> <p>(v) At a time when EV sales are slowing due to the lacking progress in charging infrastructure and where new vehicles sales of more polluting PHEVs is increasing 45% vs last year (according to SMTT) it would be more sensible to charge PHEVs Band 1 pricing and keep the 10 minute rate for pure EVs only.</p> <p>(d) Discrimination against Foreign Registered Vehicles</p> <p>(i) According to the proposal, foreign registered vehicles are priced at the highest most polluting category irrespective of the vehicle emissions.</p> <p>(ii) Differentiating pricing purely on the basis of a vehicle being foreign is unfair and discriminatory against foreign visitors</p> <p>(iii) Foreign registered vehicles, where possible, should be charged at the correct band based on their emissions</p> <ul style="list-style-type: none"> o While it is understood that it may not be always possible to determine the correct pricing band for a foreign vehicle, there are practical solutions, which are already in existence, that can resolve this issue. o For example: <ul style="list-style-type: none"> <input type="checkbox"/> TFL allows for registration of foreign vehicles for transiting the ULEZ <input type="checkbox"/> RingGo, the phone application chosen by Westminster Council to administer Pay to Park, already allows for foreign vehicles to be registered with documentary evidence and for these to be classed in the correct band. 	<p>(d) 71</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(iv) It is fair to give foreign vehicles an option to charged correctly or to request a refund if overcharges</p> <ul style="list-style-type: none"> o It can be reasonable to apply the highest polluting band for those vehicles who had not been correctly registered by their owner in the App database o However, it would be discriminatory to charge vehicles a higher fee purely because they have a foreign number plate and provide no option for the foreign vehicle to comply or obtain a refund. <p>Thank you for considering my representations and I hope the current proposal will be rejected until a better solution for the issues above is put forward.</p>	
270.	<p>██████████ ██████████ Email dated 11th February 2024</p>	<p>(a) First you encouraged people to buy electric cars. Now you wish to penalise them. Not everyone is a cyclist.</p> <p>(b) Please explain clearly what you are proposing and when.</p>	<p>(a) 7E</p> <p>(b) WSP replied to ██████████ on 28th February 2024, providing a copy of the City Council's Notice of Proposals and links to the City Council's Cabinet Member Reports.</p>
271.	<p>██████████ ██████████ Email dated 11th February 2024</p>	<p>(a) I'm writing to object to the proposed changes to resident permit charges, as a resident in Westminster. These proposed charges are regressive, in that they disproportionately affect the poorest in our community.</p> <p>(b) This seems another attempt to increase revenues rather than to address the underlying</p>	<p>(a) 3A</p> <p>(b) 8A,10B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>causes of pollution. To reduce pollution, it would make much more sense to streamline the driving experience in Central London and reduce congestion from LTNs, poor planning around cycle lanes, and reduced speed zones (20 mph everywhere doesn't make any sense...). Driving is necessary for many people and is not a luxury - inflation in such charges and lower productivity actually resulting from inefficient driving make net zero harder to achieve, by reducing the amount of time and money that can be spent investing in future innovation.</p>	
272.	<p>██████████ ██████████ Email dated 11th February 2024</p>	<p>No</p>	<p>0A. Noted.</p>
273.	<p>██████████ ██████████ Email dated 11th February 2024</p>	<p>(a) I strongly object to permit price increases.</p> <p>I am █████ years of age and often do things (such as heavy shopping, █████, █████, doing many errands for █████) which I could not do without a car. I do walk whenever possible but it isn't always possible. The cost of living in central London is already extremely high and we cannot afford these constant above inflation price rises.</p> <p>I also find pay by phone onerously expensive. Many areas are not easily accessible by public transport and it limits life to have to avoid going out</p>	<p>(a) 3B, 3E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>simply because parking costs are so high.</p> <p>(b) I find it outrageous that there is a constant stream of measures to limit motorists without publishing any convincing data about emissions. Journeys that used to be completed in about 15 minutes now take up to one hour with all the width restrictions, diversions etc on the roads. While possibly reducing the number of vehicles (?) on the roads, the actual amount of emissions must have increased significantly.</p>	(b) 11A, 10B
274.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 11th February 2024</p>	<p>I think your congestion fees, as well as parking raising charges, are unfair. I understand that this has a final destination called: vehicle elimination in central London.</p>	11D
275.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 11th February 2024</p>	<p>I am writing to strongly object the current consultation paper which aims to withdraw the concession for electric vehicles allowing vehicles to park up to the bay's maximum stay for a minimum 10-minute payment.</p> <p>(a) This new measure is disproportionately and negatively impacting drivers who have made the choice to drive clean and sustainable vehicles to support and align with the country and government long term ESG and sustainability goals. Although this initiative is inevitable, it comes way too early and with virtually no notice and poor communication around it. EV drivers should at least be granted a few years to adapt to this new norm</p>	(a) 7E, 8E, 5F, 12B

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>as many of us would have contracted long lease agreements with car manufacturers precisely for daily commute purposes. The minute this new rule is enforced, it will virtually make it economically impossible for us to park in town on a work day, strongly impacting our professional lives.</p> <p>(b) Further, I can't even begin to imagine the negative impact on the entire EV-driven community of businesses and tech companies that are currently operating in London and flourishing on the back of this amazing subsidy initiatives. This includes, EV-charging point developers, small and medium businesses who have invested millions of pounds into shifting to electric fleets for their workers (and will see their operating costs bounce overnight) but will also completely annihilate innovation in the EV-sector in Central London (companies like On.to for example). Currently this measure is something that Westminster EV commuters are very proud of and a clear differentiator for the council, why turn this into one of the most unpopular measure of all time?</p> <p>(c) Finally, the change proposed itself seems too drastic and disproportionate. Why not look to compromise by starting to change prices on the weekend or a limited amount of days to create a transition period for current subsidy-dependent people commuting to Westminster every day? Why not look into specific cases of people fully reliant and dependent on it? Why not filter by models first? Many of us who drive to London often have no</p>	<p>(b) 12A</p> <p>(c) 7I, 3B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>other choice but driving to town as living too far from tube stations or having commute restrictions for personal reasons. This will create a huge impact on our lives, both personal and professional.</p> <p>(d) This is one of the most important decisions that the council may have to do in recent times with significant impact in flows of people and businesses which clearly seems to be totally underestimated. This change should not be taken lightly and would deserve to be more broadly advertised over a longer period of time and discussed with the broader Westminster EV driven community. This change is at risk of becoming one of the most unpopular measures ever taken at the council level since the Park Lane bike lanes!</p> <p>Many thanks for your consideration.</p>	(d) 8E
276.	<p>██████████ ██████████ Email dated 11th February 2024</p>	<p>I vehemently object to these proposals to allow Electric vehicles to be charged less than other vehicles. Electric vehicles are incredibly bad for the environment and users should be paying more for these vehicles, not less. The negative environmental impact, created by the mining of the necessary components needed for making batteries together with the horrendous negative impact of not being able to dispose of batteries in a healthy way and leaking dangerous chemicals into the environment, is far worse than then the 'supposed' good that we are being sold as a reality. It is the inverse of what you are suggesting.</p>	9A

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
277.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 11th February 2024</p>	<p>I would like to register my objection against the changes in parking charges.</p> <p>There are simply not enough electric chargers in the Westminster area for everyone to upgrade to electric and therefore I object to the proposal the petrol and diesel cars should pay more. Until the council has installed electric charges in a sufficient quantity and ensured vandalism of any car attached to them is prosecuted this is not realistic or fair.</p>	6A. Criminal damage of a vehicle is a matter for the Metropolitan Police.
278.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 11th February 2024</p>	<p>I wish to object to the increase in the cost of resident parking permits.</p> <p>The hike in the rate for residents to park cars has been done <i>wholly in bad faith</i>.</p> <p>This increase in charges comes after a prolonged period of motorists being encouraged to purchase clean energy cars, incentivised by lower parking charges. To suddenly increase the cost to motorists is unreasonable.</p>	7E
279.	<p>██████████</p> <p>Resident</p> <p>████████████████████</p> <p>Email dated 11th February 2024</p>	<p>I live in Westminster and recently purchased an EV to help contribute to Westminster's 2040 net zero emissions target.</p> <p>Both the purchase price and vehicle insurance for the EV was at a significant premium to a regular petrol car, but lower running costs including free resident parking permit, reduced pay-to-park casual kerbside parking, and zero Congestion Charge help somewhat with the cost of EV ownership.</p>	7A, 7D, 7E

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>Hence, I am disappointed to learn that Westminster proposes to eliminate free resident parking permits for EVs (despite EV's producing zero CO2 emissions) and increase pay-to-park charges for EVs.</p> <p>Combined with the elimination of the Congestion Charge 100% discount for EVs, Westminster's proposed charges means that it is no longer economical for me to own an EV, hence I will have no choice but to switch back to a regular combustion engine vehicle instead.</p> <p>I hope Westminster will reconsider penalising EV owners who are trying to contribute to reduced emissions in London.</p>	
280.	<p>██████████ Resident ████████████████████ Email dated 12th February 2024</p>	<p>(a) We are Resident Permit holders. and we have been living in the Westminster area for more than 30 years. We believe the proposed scheme for restructuring the parking permit is unfair. Under the proposed scheme, we will end up paying £321 compared with £166 that we are paying at the moment. This is double the money. We cannot afford to pay as we are pensioners. We can't even afford to buy a new car. As such, we think the system should be fair to everyone who owns a car – special consideration should be given to people who can't afford to pay, including pensioners.</p> <p>We are all for removing pollution and having a healthy environment, but this is not the way forward</p>	(a) 3C, 3A, 11B

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>to deal with the Resident parking permit charges. You can always increase the parking charges for vehicles entering the Westminster area that harm the environment more than the residents themselves.</p> <p>(b) Another consideration is to increase the number of traffic wardens who can catch up with motorists, as they often park their cars knowing full well that there aren't many traffic wardens around. Some of them even park on single or double yellow lines! We live in the Westminster area, and we know full well how these motorists get away with it and, at the same time, occupy the Resident's Bay.</p> <p>If the Labour Party tries to change this scheme without proper consideration, people may think about voting for the Tory Party at the next councillor election.</p> <p>I would prefer the present Councillors think very carefully about this restructuring scheme.</p>	(b) 10D
281.	[Duplicate letter: removed from report]		
282.	<p>██████████ ████████████████████ Email dated 12th February 2024</p>	<p>I am writing to raise my objections to your new parking proposals which will see my parking permit more than double. I live on ██████████ ██████████</p> <p>(a) I am objecting on various grounds including you are basically increasing charges for me having</p>	(a) 7B, 7L, 3C

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>my vehicle parked (when it makes no emissions) even though i already pay an incremental tax on my vehicle which i need for work in the form of fuel duty (the more i drive the more i pay), you claim it is for a “fairer” system but i see using fluffy words such as this merely hides the fact that if you are rich and can afford it the proposed raise is non consequential . As such it is anything but fairer but most certainly in keeping with these so called “environmental” vanity projects devised, promoted, and funded by the billionaire / transnational corporate class and as such anything but grassroots and organic.</p> <p>However before i elaborate, both as a resident and as [REDACTED] [REDACTED] [REDACTED] i would like to ask a couple of questions regarding the construct of this consultation.</p> <p>(b) If a significant majority of residents object to your plans, will the Council abandon them?</p>	<p>(b) 1B, Objections to traffic management schemes are considered on the merits of the arguments put forward rather than a tally of votes. For example, a compelling argument from one person can be enough to upend a scheme, whereas a slew of objections based on a shared misunderstanding or a flawed argument would carry less weight. It is often the case that the City Council has to consider compelling arguments both for and against a scheme to determine, on balance, which position is in the best combined long-term interests of the residents, businesses and visitors in the City.</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(c) If the answer to question one is no, then what is the purpose of this consultation, other than a “tick boxing exercise”?</p> <p>(d) Will the numbers objecting / agreeing with your proposals be made available to the public or will we have to go through the FOI route to obtain them.</p> <p>(e) What status will be given to environmental activist “charities” if they submit and does the council take into account who are funding them.</p> <p>(f) As a Westminster resident I have no problem giving my address to the consultation to prove this, what mechanism is the council going to use to prevent “activist” non-residents from flooding the consultation.</p> <p>(g) Is Westminster council one of those that have signed up to deliver net zero projects ahead of the government’s own unfeasible targets and if so what mandate did you seek for this?</p>	<p>(c) The consultation process allows the City Council to understand how proposals will affect people, whether the proposals are fit for purpose, and whether there are particular repercussions of the proposals which the City Council had not considered. If compelling or insurmountable concerns or issues come to light, then a proposal can be modified (potentially subject to further consultation) or abandoned entirely.</p> <p>(d) Yes, the City Council’s consultation report will be published once a decision has been made and this will include the numbers objecting / supporting or having no particular stance.</p> <p>(e) All submissions are considered on the merits of the arguments put forward. There is no weighting system for responses.</p> <p>(f) The consideration of objections based on the merits of arguments put forward rather than by weight of numbers overcomes the concern about individuals or groups flooding a consultation.</p> <p>(g) Westminster City Council declared a Climate Emergency at a Full Council meeting on the 18th September 2019 – committing the council to becoming net zero by 2030 and the city of Westminster by 2040. This was a cross party declaration made by elected councillors – a council declaring a climate emergency is an official</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>My objections are:</p> <p>(h) I am going to be forced to pay more than double what I pay now for being parked.</p> <p>(i) It has been found that EV cause even more damaging particles due to their extra weight but your consultation clearly does not take this into account. Perhaps it's the wrong kind of statistic for the council and its pre-determined course of action.</p> <p>(j) I will not trade in my vehicle for an Electric Vehicle as I believe them to be less environmentally friendly than what I have now. Given the intensive mining for rare elements needed to produce the batteries and the difficulty in safely disposing of them.</p> <p>As such can the council please give details of what initiatives it plans to put in place to safely and environmentally dispose of these lithium batteries used in EV's. if you have not yet devised what you are going to do to dispose of these batteries you cannot claim this is an environmentally motivated initiative rather than just a cash grab.</p> <p>(k) I have come to the personal opinion that “net zero” is nothing more than a corporate fascist</p>	<p>recognition of the urgent need to address and mitigate the impacts of climate change at a local level.</p> <p>(h) 3C</p> <p>(i) 9A, 8G</p> <p>(j) 9A, 8A</p> <p>(k) ██████████'s comments are noted. The City Council cannot comment on decisions made at a</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>power grab by an out of control ruling class under the fake veneer of "saving the planet" and has little to do with genuine environmentalism. The very term "the Science is settled" should be alarm bells to anyone still being able to think critically which sadly will rule out most people who have gone through the university system in recent years.</p> <p>If we take for example ULEZ and the controversy surrounding the scheme, the way it is being implemented is clearly being done with other purposes in mind. Apart from the ubiquitous stench of hypocrisy that surrounds net zero policies in general, ie if you are rich you can still pollute, which manifests itself in the unhinged displays by the great and good flying into places like Davos in Switzerland on their private jets to lecture people to get out of there cars and onto their bikes.</p> <p>If ULEZ is just about getting the worst polluting vehicles off the road why not have DVLA refuse to issue road tax for those vehicles, why the need for a massive rollout of "surveillance cameras" if not for another purpose? The recent findings of the Advertising Standards Council which ruled the Mayor of London's office claims misleading is just the tip of the iceberg.</p> <p>As stated i am [REDACTED] and activist and thankfully elements within the organized labour movement are awaking from their slumber about what impact net zero lunacy and vanity virtue signalling projects have in store for the workforce</p>	<p>national / global level or by Transport for London. However, the City Council is satisfied that the rationale behind its proposals is sound. Please see 0A and the Cabinet Member Reports at https://westminster.moderngov.co.uk/ieDecisionDetails.aspx?ID=1896 (Parking Fee Structure Review – Approval of Concept (May 2023)) and https://westminster.moderngov.co.uk/ieDecisionDetails.aspx?ID=1974 (Parking Fee Structure Review (November 2023)).</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>and general population of this country, with the quite clearly insane situation surrounding Port Talbot steel works. So basically Net Zero zealots would have everyone believe that moving steel production capabilities to countries with far "dirtier" power grids than ourselves like India, then potentially transporting products that used to be produced here by diesel powered shipping is going to save the world.</p> <p>The billionaires net zero project (which is what it is), promoting the likes of the charlatan "experts" for hire at the likes of Imperial College and their garbage in garbage out computer models and holding this up as proof "the science is settled", will have a massive detrimental impact on the people of this country in terms of real jobs, energy prices, etc. All the time these misanthrope billionaires like Bill Gates buy up multi million pound beachfront mansions which surely if they believed the "world is boiling", the ice caps will be gone in 1, 2, 5 10, take your pick years, they would be moving to the mountains.</p> <p>As stated [REDACTED] [REDACTED] and believe that our energy policy is basically criminal and eventually people will need to stand trial for the fraud and racketeering they have pushed on the people of this country with their "net zero" corporate fascist agenda</p>	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>There is nothing wrong with offshore wind turbines, tidal power etc - i fully support it, but not at the expense of a reliable mixed energy grid, which any society needs if they are not going to immiserate their populations unnecessarily.</p> <p>Not one old age pensioner (or anyone for that matter) should suffer from fuel poverty on the back of this anti humanity billionaire nurtured cult which needs to cancel, threaten, defund and silence any scientists including Nobel Laureates that do not agree that the tiny fraction of manmade CO2, a gas that is imperative to all life on the planet, in the atmosphere is the only factor affecting climate.</p>	
283.	<p>██████████ ████████████████████ Email dated 12th February 2024</p>	<p>I would like to raise my concerns and complaints about the newly proposed parking charges for residents from next year. In particular the additional diesel surcharges for pre-2015 vehicles.</p> <p>I have been an owner of a diesel car since ██████████ and chose this car at the time due to its relatively low CO2 emissions (139). Fast forward, we now know more about pollution, and, as every human being should, I try to best to help with the environment:</p> <ul style="list-style-type: none"> • I cycle almost everywhere • I recycle • I minimise food waste • I buy sustainable & organic where possible • Minimise using my car • Etc... 	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(a) I love living in London and am a proud resident, have been since [REDACTED]. But in recent years cost of living and cost of living centrally has been a double issue (esp after brexit & covid). Supermarkets charge more due to location so to help with my budget, I do use my car once in a while to do a big shop a bit further away. With public transportation getting more and more expensive, I do use my car once in a while to visit the countryside & friends outside London. I just cannot afford to use trains. Plus using it for emergencies, like my friend had to make her way to the hospital and needed urgent help.</p> <p>Since TfL introduced the ULEZ charge, these little uses are even more costly and constraining my movements. A charge that has been poorly implemented, without any intelligence re time of day/frequency/resident vs non-resident etc.</p> <p>(b) And now this proposed surcharge is just another cost, penalising being a proud resident! I have not seen any evidence that residents are more polluting than non-residents. It feels like milking residents to fill budget gaps & shortages. It's like being an easy target....</p> <p>(c) There is a shortage of affordable second-hand cars due to Brexit. I am also currently unemployed and struggling to make ends meet. Buying another car is no option.</p>	<p>(a) 3E, 3B</p> <p>(b) 3C, 11B, 8A</p> <p>(c) 3C</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(d) It would thus be great if this surcharge – on top of the higher annual parking fee, would be cancelled or amended to help differentiate between residents vs non-residents. I appreciate there is no quick fix, all of us doing our best to make London green – but at this rate you are driving me and other residents out of London!</p>	<p>(d) 7I</p>
<p>284.</p>	<p>██████████ Resident ██████████ Email dated 12th February 2024</p>	<p>As an EV owner and Zone C resident, I am writing to object to the proposals for changing the charges for parking EVs on the grounds that</p> <p>(a) It will discourage purchase of EVs, this will impact the productivity and the economy at a time where stimulation of the economy is needed to avoid UK going into a recession or stagnation.</p> <p>(b) The additional parking charges for EVs will remove the incentive for EVs to be used as a preferred mode of transport for those who have the EVs already, pushing them onto a transport networks that is not fit to absorb the additional capacity.</p> <p>(c) Persons depending on their vehicles for mobility, like the elderly or children and families will be disadvantaged, and discouraged by the huge rise in the cost of parking.</p> <p>(d) The increase in cost will add fuel to inflationary pressures on the economy and household bills.</p>	<p>(a) 7D</p> <p>(b) 7D, 6D</p> <p>(c) 3B</p> <p>(d) 3E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(e) A more gradual increase over a 3/5 year period would be a much fairer way of increasing charges.</p> <p>(f) The increase sends a signal to the wider community that WCC is not prepared to do it bit to shoulder the cost of reversing climate change but to profit from it.</p> <p>(g) The massive hike in EV charging will be seen as anti green policy.</p> <p>I urge you to consider</p> <p>(h) A smoothing effect in bringing these charges in the middle of a cost of living crisis where people who have invested in EVs for altruistic or economic reasons are being unfairly punished for their choice.</p> <p>(i) Making a difference between Hybrid and Fully electric vehicles in the charging band.</p>	<p>(e) 5F</p> <p>(f) 8A</p> <p>(g) 7A</p> <p>(h) 5F, 7E</p> <p>(i) 5E</p>
285.	<p>██████████ ██████████ Email dated 12th February 2024</p>	<p>I have received the email with the subject line City of Westminster Parking Services - Resident Permit Changes.</p> <p>I have reviewed the proposed changes, and I would like to make some comments.</p> <p>Your email states: <i>Tariff and Permit Pricing Restructure (Emissions-Based Charging) - NoP</i> <i>The City of Westminster has some of the highest</i></p>	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p><i>carbon emissions and worst air quality of any national local authority. Therefore, we propose to introduce emissions-based charging for both pay-to-park casual kerbside parking and residents' parking permits to incentivise cleaner less polluting vehicles.</i></p> <p>(a) It is quite peculiar that you mention that the proposed changes are emissions-based. My vehicle is fully electric and produces zero carbon monoxide. Same as other electric vehicles. Please explain how my charge will rise from £0 to £40-80. I would understand if these changes were applied to hybrid cars, but I do not know how they can be applicable to fully electric ones.</p> <p>(b) Your proposed increase in charges is NOT based on emission, and you need to clearly specify the reasons for such an increase to the fully electric cars. Your explanation of the suggestions needs to be clearer and more truthful.</p> <p>Another quote from your email:</p> <p><i>The proposals for both the pay-to-park and residents' permit schemes align with the Fairer Westminster Strategy and complement a number of environmental policies and commitments outlined in section 4.2 of the May 2023 report – 'Parking Fee Structure Review – Approval of Concept' which is available at https://westminster.moderngov.co.uk/ieDecisionDetails.aspx?ID=1896. The improvement of air quality</i></p>	<p>(a) 7A</p> <p>(b) 11E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p><i>is an important priority for the council and these policies support this aspiration. The detail for these schemes was signed off via the Parking Fee Structure Review report in November 2023 which is available at https://westminster.moderngov.co.uk/ieDecisionDetails.aspx?ID=1974.</i></p> <p>(c) I have read the documents linked in the message. They mention only charging more money from Westminster residents and visitors. They do not include other improvements, statistical data, or measures to reduce traffic jams or idling cars. Living in the heart of [REDACTED], I can assure you that neither residential nor visitor parking is the problem: it's the chaotic road closures causing massive traffic problems, idling cars, and a significant reduction of parking spaces, causing people to drive around for 30-45 minutes to find a parking spot, etc. I see your document as very hypocritical and will do my best to reach out and share this with the public through media and social networks.</p> <p>It seems that Westminster's only answer to everything is charging more money, even in cases when it makes no sense.</p>	<p>(c) 11A, 8F, 10B</p>
286.	[REDACTED]	<p>(a) I strongly object to the proposed revised scheme as it is over-complicated, confusing, discriminatory, exploitative, and based on false premises. The grounds for holding this view are as follows:</p>	<p>(a) 4A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>Email and letter dated 12th February 2024</p>	<p>(b) The proposal may be illegal as it could involve a breach of the Data Protection Act. The DVLA have a duty to safeguard drivers' car registration details. I am not satisfied that Westminster parking wardens should be given access to this information.</p> <p>(c) Most residents of the UK do not have to pay to park their cars outside their houses. The act of charging Westminster residents to park a car at home is in itself discriminatory. Imposing a financial burden upon residents not sufficiently affluent to own a house with a driveway or garage is furthermore discriminatory. Westminster residents who pay council tax should be entitled to free residents' parking under a scheme funded by revenue derived from charging non-residents to park in the borough.</p> <p>(d) A stationary car does not contribute to air pollution so using this as a reason to tax vehicles in a discriminatory manner is not acceptable. Others schemes in London raise revenue by taxing moving vehicles. Whilst air quality is an important issue, carbon dioxide emissions are not harmful to humans so a parking scheme should not make reference to this gas. Indeed, the national policy of attaining Net Zero is open to criticism and likely to change as it is a meaningless and unattainable concept.</p> <p>(e) The City of Westminster is an affluent</p>	<p>(b) 8B</p> <p>(c) 8B</p> <p>(d) 7B, 11A</p> <p>(e) 11D, 3E, 7L, 8A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>borough that does not need to exploit residents more than necessary. The war on motorists evident in other London driving schemes should not be exacerbated by a council appointed to serve residents' best interests, especially during a cost of living crisis; motorists are already subject to high petrol costs, high vehicle tax rates and massively increased insurance costs. The proposed residents' parking scheme is a blatant attempt to exploit residents to raise funds for other council schemes.</p> <p>(f) On a personal level, [REDACTED] [REDACTED] having sacrificed car-ownership for a [REDACTED] year career of working in London, I strongly object to being penalised for buying my first car. I should also add that the car is only used once a fortnight on average, and then only to drive outside London. The car's contribution towards carbon dioxide emissions has been negligible as is has only been driven to the edge of Westminster to access the M40 and the M1. Like most London residents, I remain a regular user of London transport; on this subject, the air quality of the underground should be given high priority due to dangerously high levels of PM .25 particulates.</p> <p>In conclusion, I strongly urge the council to abandon the proposed scheme and to remain with the much simpler current system that differentiates between electric, petrol and diesel vehicles in a more equitable manner.</p>	<p>(f) 7C. Please note that the London Underground is maintained by Transport for London and concerns regarding this service should be directed to that authority.</p>

APPENDIX B – RESPONSES TO CONSULTATION

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
287.	[Duplicate letter: removed from report]		
288.	<p>██████████ ██████████ Email dated 12th February 2024</p>	<p>(a) Whilst I accept the City of Westminster has some of the highest carbon emissions and worst air quality of any national local authority, I do not accept the stated assertion that increasing the charge for both pay-to-park casual kerbside parking and resident parking permits will 'introduce a fairer and more proportionate charging structure so vehicles are charged in accordance with the level of emissions they produce'.</p> <p>Westminster Resident parking is, I understand, already one of the lowest in the country. I would argue Westminster residents do not own cars to travel around Westminster or other London Councils, they own cars to travel infrequently outside London. An increase in Resident Parking charges has very limited impact on Westminster's high carbon emissions and air quality; it's taxing a vehicle irrespective of its use (and in many people's case very limited use).</p> <p>(b) Further, at a time when so many people are facing cost inflation and associated hardship, why does Westminster Council state the rationale is to reduce these high carbon emissions and improve air quality when the increase is not even a cost neutral measure. The proposed changes, I understand, raises £800K and that it is a 20% increase on current levels and with more than 70% of resident parking owners paying more. It is clearly</p>	<p>(a) 7C</p> <p>(b) 3E, 8A, 11D, 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>not fair and anti-car and is trying to make, through increased taxation, people change or give up their cars. This is not that straightforward as changing cars is not inexpensive, especially as some higher polluting cars have lost value and the true cost of charging and owning electric cars is only now emerging.</p> <p>(c) The largest proportion of vehicles that enter the city are non-resident; the majority are tradesman/workers in the building, hospitality and leisure industries. These are the vehicles that cause the high carbon emissions. The vast majority of commuting office workers do not to drive into London and those that do, are now doing it less with hybrid working from home becoming the norm.</p> <p>(d) In my opinion a more sensible and fairer path to reduce high carbon emissions and improve air quality (and not add further to the cost inflation that many cannot afford) is to change the current resident parking charges to penalise higher polluting cars but on a cost neutral basis. Then determine, over a suitable period of time, the TFL ULEZ impact. Let's hope it does a better job of reducing Westminster's high carbon emissions than the Congestion charge has done in reducing congestion.</p> <p>(e) Implementing a resident parking system, at this moment, that taxes car ownership further to park in Westminster is a wrongly timed measure. Irrespective of the ULEZ impact, I feel ultimately the</p>	<p>(c) 11B</p> <p>(d) 71</p> <p>(e) 10A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>only fair method to reduce high carbon emissions is to stop entirely the annual road tax and increase suitably the tax on petrol and specifically diesel.</p>	
289.	<p>██████████ ██████████ Email dated 12th February 2024</p>	<p>I am emailing to object to the planned proposal to withdraw the current Westminster parking concession for electric vehicles (EV's) under "pay to park" scenarios. Please see grounds below:</p> <p>(a) The current low parking rate for EV's encourage a high take-up of EV's for those living and working in Westminster. In particular, it provides commuters and shoppers with incentives to drive into Westminster (especially those that live in more rural areas with limited access to public transport and those who would ordinarily not travel into town). The current scheme plays a very important role in the country's move towards net zero, encouraging employees to return to the workplace post-COVID and the population supporting the retail industry. I do not believe this has been considered in the proposal.</p> <p>(b) I experience that most of the heavy carbon emitters in Westminster are the old vans and lorries that are servicing the ever-increasing construction in the borough. Regular EV drivers should not be penalised for this. Not only do these vehicles cause high pollution in the borough, a limited amount of available parking spaces and heavy traffic, it is probably safe to assume that the drivers of these vehicles expense their parking charges to their company. It is neither fair, nor reasonable, to treat</p>	<p>(a) 7D</p> <p>(b) 7A, 7I</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>owners of electric vehicles (who are typically everyday individuals/commuters/shoppers) at similar weighting to these groups.</p> <p>(c) The borough could benefit from finding alternative solutions, such as levying a vehicle surcharge during the period of construction work (responsibility of the master contractor) to account for the natural increase in heavy emitting vehicles that the construction industry bring.</p> <p>(d) The increase in cost for an EV owner in zone G for a 4-hour period under the new consultation appears to increase from £0.96 to £18.48. This increase is completely unacceptable and will, in effect, prove a massive impediment to driving into Westminster. It (i) does not consider EV owners that choose an EV for better cost management (many of whom are locked in to long term leases) and (ii) is clearly a regressive tax which will impact those on lower incomes the most and those on higher incomes the least. The proposal is a step backwards and, frankly, seems unfair to current EV owners, particularly those on lower incomes.</p> <p>(e) I believe these changes will lead to an inevitable immediate decrease in the percentage of electric vehicles operating in Westminster and will lead to a higher percentage of petrol / diesel vehicles creating more pollution and decreasing the already bad levels of air quality in the borough. This is the exact opposite to what is required under the various legal statutes which cover this issue. It</p>	<p>(c) 10B</p> <p>(d) 3D, 3A</p> <p>(e) 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>is also unclear how increasing the price for parking for electric vehicles is in line with the Council's commitment to become carbon neutral by 2030.</p> <p>In summary, I have seen no rationale or evidence from the council as to why the increase in costs for parking for EVs is a) in line with the council's environmental or equality policies and b) would actually have a beneficial effect on the borough. There seems to be no upside and only downside from this particular change on air quality, economics of the borough's businesses and is also regressive to impact those on lower incomes the most.</p>	
290.	<p>██████████ ██████████ Email dated 12th February 2024</p>	<p>As an EV owner and Zone C resident , I am writing to object to the proposals for changing the charges for parking EVs on the grounds that</p> <p>(a) It will discourage purchase of EVs, this will impact the productivity and the economy at a time where stimulation of the economy is needed to avoid UK going into a recession or stagnation.</p> <p>(b) The additional parking charges for EVs will remove the incentive for EVs to be used as a preferred mode of transport for those who have the EVs already, pushing them onto a transport networks that is not fit to absorb the additional capacity.</p> <p>(c) Persons depending on their vehicles for mobility, like the elderly or children and families will</p>	<p>(a) 7D</p> <p>(b) 7D, 6D</p> <p>(c) 3B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>be disadvantaged, and discouraged by the huge rise in the cost of parking.</p> <p>(d) The increase in cost will add fuel to inflationary pressures on the economy and household bills.</p> <p>(e) A more gradual increase over a 3/5 year period would be a much fairer way of increasing charges.</p> <p>(f) The increase sends a signal to the wider community that WCC is not prepared to do it bit to shoulder the cost of reversing climate change but to profit from it.</p> <p>(g) The massive hike in EV charging will be seen as anti green policy.</p> <p>I urge you to consider</p> <p>(h) A smoothing effect in bringing these charges in the middle of a cost of living crisis where people who have invested in EVs for altruistic or economic reasons are being unfairly punished for their choice .</p> <p>(i) Making a difference between Hybrid and Fully electric vehicles in the charging band</p>	<p>(d) 3E</p> <p>(e) 5F</p> <p>(f) 8A</p> <p>(g) 7A</p> <p>(h) 5F, 7E</p> <p>(i) 5E</p>
291.	<p>██████████</p> <p>████████████████████</p>	<p>I purchased my electric car and committed to a lease on my office, on the basis of affordable parking charges and to ensure environmental</p>	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	Email dated 12 th February 2024	<p>progress.</p> <p>(a) I understand the need to increase the charges due to the proliferation of electric vehicles and lost revenues for Westminster, however, there is very little difference in charges now for electric vehicles and regular cars which seems grossly unfair and not environmentally friendly.</p> <p>This further undermines the council's legal and moral obligations to promote a reduction in air pollution and CO2 emissions</p> <p>(b) Furthermore, the jump in charges for parking an electric car is so dramatic, from what was previously very affordable is now unaffordable and therefore unfair. Previously I would have paid £0.93 for 4 hours of parking. It is now going to cost around £20, £100 per week, over £400 per month making the purchase of my electric car at a premium price uneconomic. The jump in charges for electric cars are egregious and disproportionate.</p> <p>(c) At the very least I would hope that the new charges could be staggered over time, to give car owners time to adjust to this and help with economic travel planning and local businesses should have some form of exemption.</p>	<p>(a) 7A</p> <p>(b) 3D</p> <p>(c) 12E</p>
292.	<p>██████████</p> <p>████████████████████</p>	<p>I would like to raise the following objections for reference 8056/PJ:</p> <p>(a) Please limit the number of parking permits to</p>	<p>(a) 5A, 5B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	Email dated 12 th February 2024	<p>1 permit per household address for 1 vehicle, Westminster Council should be limiting the number of vehicles per household address. If 1 vehicle per household address is deemed too restriction, then I propose a maximum of 2 resident parking permits per household address, for a total of 2 vehicles per household address. The current policy of allowing 1 person up to 3 vehicles is utterly unnecessary and actually promotes vehicle ownership and overcrowding in residential parking bays.</p> <p>(b) Please bring back the paper Resident Parking Permits. Without paper parking permits, the residents cannot tell which cars are parked illegally in the resident bays.</p> <p>(c) All resident parking charges should be lowered by at least 20-30% during this period of continuous cost-of-living crises. The resident parking fees should not be a source of revenue generation for Westminster Council as people that must have cars have no choice to park off-street.</p> <p>(d) Westminster Council and RBKC should share resident permit databases to avoid residents having to fight PCN when parking on boundary streets that allow permit holders from both adjoining boroughs to park on the same street.</p>	<p>(b) 10D</p> <p>(c) 3E, 8A</p> <p>(d) WCC and RBKC operate a process whereby resident permit holding VRMs are shared between us so each is aware which vehicles are legally parked in reciprocal bays and which are not.</p>
293.	<p>██████████</p> <p>████████████████████</p>	<p>Changes to how we charge for parking Westminster City Council. Your website states as follows:</p> <p>"...Monday, 18 March 2024, we will withdraw the</p>	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>Email dated 12th February 2024</p>	<p>current concession for electric vehicles and plug-in hybrids, allowing those vehicles to park up to the bay's maximum stay for a minimum 10-minute payment..."</p> <p>I object to the above proposal based on the following grounds:</p> <p>(a) It is irrational to claim that the council will encourage the use of low polluting vehicles and discourage the use of those that are more polluting by charging £4.62 an hour (for a 4 hour stay £18.48) instead of 96 pence for a minimum 10 minute payment on fully electric vehicles. My fully electric vehicle (██████) has 0 emissions and would be rated as Band 1 in your new proposals. My vehicle's emissions have not changed from 0. My electric vehicle is not suddenly causing more pollution.</p> <p>(b) The tube and buses are not good clean air options due to bad pollution. Your proposal for electric vehicles is likely to discourage me from parking my fully electric vehicle in Westminster for any large period of time because it will be very expensive to park for 4 hours in the West End. This will have an effect on visiting restaurants, cinema and theatre visits and means visits will be less frequent. This cannot be good for the economy.</p> <p>Please re-consider your proposal and leave the current option for fully electric cars as it currently is.</p>	<p>(a) 7D, 7A</p> <p>(b) 6D, 12A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
294.	<p>██████████</p> <p>██</p> <p>Email dated 12th February 2024</p>	<p>I think another tax on families that have a car at this time when the cost of living is already causing families to struggle is just another signal why I will not be voting Labour in the up and coming local and General elections. Labour are all about tax and waste of revenue from it. There is no evidence that higher taxes on motorist improves the environment or the roads. It all gets eaten up in socialist vanity projects.</p>	3E, 8A, 8F
295.	<p>██████████</p> <p>██</p> <p>Email dated 12th February 2024</p>	<p>(a) I do understand the need for reducing air pollution and improving air quality in Westminster and I would normally support any initiatives that aim to achieve this. However, I am not sure your proposals are in reality anything more than an attempt to tax more and gain extra revenue for the council. The reasons I say this are quite straight forward:</p> <p>(b) I would like to purchase an electric car and help reduce the air pollution in the area but I am afraid due to the severe lack of charging points I do not have the confidence that if I have an electric car I will find a free charging point when needed and therefore have a working car for anytime needed.</p> <p>I live in a flat in Westminster and I would rely on public charging points to charge a car of which there are extremely few. As a result even though I want to purchase an electric car I have had to recently purchase a petrol car. I need the reliability that currently only the petrol car can give me as I</p>	<p>(a) 8A</p> <p>(b) 6A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>cannot afford to have my car out of operation due to a lack of available charging points.</p> <p>I do understand what the council is trying to achieve but I feel I am being penalised for something that I can do nothing about. I am in reality being penalised for the council not developing enough public charging points which would then allow me to purchase an electric car.</p> <p>(c) For example, even if you were to hike up the price of parking permits by tenfold I could still not buy an electric car. So, why I am being penalised for something that I would like to have but I can not have and is not within my control to fix?</p>	<p>(c) 3A</p>
296.	<p>██████████ ██████████ Email dated 12th February 2024</p>	<p>I am writing to object the current consultation paper which aims to withdraw the concession for electric vehicles parking in pay and display bays in Westminster</p> <p>I regularly come into Westminster and purchased an electric car (on an expensive lease) at a high price, to take advantage of the congestion charge reduction and parking benefits afforded to electric car drivers in support of the push to reduce emissions and improve the environment, inline with the longer term government sustainability goals.</p> <p>(a) This proposed changes have not been clearly communicated. By removing this parking incentive, I may as well go back to driving a lower cost petrol car as the higher cost of running my electric car is</p>	<p>(a) 8E, 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>no longer justified. I expect other drivers may find themselves in the same position until the cost of purchasing electric cars comes down materially.</p> <p>(b) Electric vehicle drivers should at least be granted a few years to adapt to this change. The removal of the congestion charge exemption comes into effect in Dec 2025, so at the very least this change to the parking charges should align with this date. You could also think about a phased reduction in charges. Maybe a min charge 30 minutes rather than 10 minutes for electric cars for the first year, or something like that.</p> <p>(c) I'm sure that the freedom for electrics car to drive in Westminster has greatly boosted trade in the borough and Westminster has been on the forefront of electric vehicle adoption and the push to reduce emissions. It would be a shame to lose this positive benefit that I think is of great benefit to the borough.</p>	<p>(b) 12E</p> <p>(c) 12A</p>
297.	<p>██████████ ██ Email dated 12th February 2024</p>	<p>I hope this message finds you well. I am writing to express my concerns and provide feedback on the proposed emissions-based charging scheme for residents' parking permits in the City of Westminster, as outlined in the recent consultation documents. While I fully support the objectives of improving air quality and reducing carbon emissions, I believe the current proposal is unfair particularly for residents like myself who rely on older diesel vehicles for essential activities outside urban areas.</p>	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(a) Economic and Practical Considerations The cost of replacing an older diesel vehicle with a cleaner alternative is prohibitively expensive for many.</p> <p>(b) One-Size-Fits-All Approach Issues The proposed scheme adopts a uniform approach that fails to consider the diverse circumstances of all residents. It disproportionately impacts those of us who rely on our vehicles out of necessity, not choice, particularly affecting residents like myself who need a diesel vehicle for rural activities with limited alternatives.</p> <p>(c) Environmental Impact Relative to Usage I rarely drive my vehicle in London, only using it to drive to the country and back once a week. I would suggest that the majority of pollution on the streets of Westminster comes from lorries, buses and other commercial vehicles. Have any studies been conducted to show what percentage of air pollution comes from vehicles with resident parking permits and what the likely impact of these proposals will likely have?</p> <p>Conclusion While I commend the objectives behind the proposed emissions-based charging scheme, I urge reconsideration of its one-size-fits-all approach. Policies must be inclusive, equitable, and sensitive to the needs of all residents, including those of us who travel to rural areas and who</p>	<p>(a) 3A</p> <p>(b) 3B</p> <p>(c) 7C, 10B, 11A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>depend on older diesel vehicles for essential purposes. By adapting the policy to accommodate these considerations, we can ensure a fairer, more effective strategy for achieving our shared environmental goals.</p> <p>Thank you for taking the time to consider my feedback. I look forward to your response and am hopeful for a policy adjustment that addresses the concerns of all impacted residents.</p>	
	<p>Email dated 12th February 2024</p>	<p>(d) Can I ask if there is any research into the breakdown of the sources of pollution in the borough, split between cars with residents permits, cars without residents permits, commercial vehicles, buses, taxis, and other sources of pollution such as from buildings, construction etc.</p> <p>Also, is there research to show what a difference the proposed taxes will have on this mix, which sets out how the proposed changes will change the average type of engine and its impact on the segment for pollution that is derived from cars with residents permit.</p> <p>I would presume impossible to bring in these proposed changes without such analysis?</p>	<p>(d) 11A. WSP replied to [REDACTED] on 29th February 2024 with the following information from the City Council:</p> <p>"Whilst we have not commissioned or carried out any specific analysis in this regard, it stands to reason that an increase in the ownership and use of lower band, less polluting vehicles at the expense of those in the higher, more polluting bands can inevitably only have a positive impact on air quality. From our own experience with our pay-to-park diesel surcharge scheme which came into effect in 2017, this has quite significantly reduced the proportion of pre-2015 diesel vehicles paying to park in Westminster.</p> <p>"For practical reasons we are unable to ascertain the proportion of emissions caused by residents as opposed to those visiting or travelling through the borough."</p>
	<p>Email dated 29th February 2024</p>	<p>(e) Thank you for the response, which is</p>	<p>(e) 3E, 11A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>appreciated. However, it also stands to reason that the proposed tax increases will have negligible impact on air quality for the reasons I have described, whilst it will have a huge impact on the individuals affected, during a cost of living crises. It is a complete disregard of duty to suggest these changes based on no scientific analysis or evidence. It makes the whole process farcical and kafkaesque. The council are elected representatives and if they wish to implement a new policy it should be based on sound principals. I would kindly suggest that facts are considered and delivered to us first to enable a fair appraisal.</p>	
298.	<p>██████████ ██████████ Email dated 12th February 2024</p>	<p>(a) The object of parking permits is not to create a cash cow for the Council. Westminster Council calls for a 'fairer Westminster strategy' so why are car owners of residents constantly under attack. It's bad enough to have to pay to park near your home but this endless assault on residents is unacceptable.</p> <p>(b) You are respectfully reminded that parking charges were historically introduced to provide the funds to create underground car parks. This never happened.</p> <p>(c) I am aware that the council's tax funds go into a central government pot which is redistributed to councils to use for all sorts of enterprises including pointless money-wasting islands down the middle of St George's Drive, proposals to create one-way systems, 15-minute cities and low traffic zones as</p>	<p>(a) 8A, 11D</p> <p>(b) The representation is noted.</p> <p>(c) 8A, 10B. Parking charges go into the City Council's Parking Places Revenue Account – please see 8A for more information.</p> <p>The islands in St. George's Drive are part of the City Council's Trees and Public Realm strategy which</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		prescribed by the WEF. It is unacceptable.	acknowledges the value and importance of trees. Trees can provide a wealth of benefits that can positively impact the lives of those who live, visit and work in the city. Alongside their aesthetic benefits, trees provide a myriad of sustainability benefits that in turn ensure a climate resilient Westminster. As an authority in the heart of central London, the carbon sequestration and storage benefits of trees are of significance as they can help to mitigate against the impact of climate change across the capital.
299.	<p>████████████████████ ████████████████████</p> <p>Email dated 12th February 2024</p>	<p>I have an electric vehicle – one of the incentives to go electric was the savings on parking/congestion charges etc.</p> <p>(a) How can it be right, less than a year since I bought my vehicle, to change the rules and start charging for a free service that was part of my calculations when purchasing?</p> <p>(b) At very least, I think any parking permit charges for electric cars should only be for cars purchased after announcing and confirming there would be a charge – whilst all electric vehicles purchased before this date will continue to be excluded from what amount's to a new tax, which no doubt once implemented will only go up every year.</p> <p>p.s my husband also has an electric car and comments above are seconded by him.</p>	<p>(a) 7E</p> <p>(b) 5H</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
300.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 13th February 2024</p>	<p>I wish to make known to you my objection to the 'Parking Proposals 8056/PJ.</p> <p>I have lived in [REDACTED] since [REDACTED] working as a [REDACTED].</p> <p>[REDACTED]. I have always had a parking permit for the B zone.</p> <p>(a) Twenty months ago I was finally able to buy a Hybrid car which meant that I did not incur a charge for my parking permit.</p> <p>Your proposals will mean that my parking permit will cost me £123.05. There is no justification for the charges for electric and hybrid vehicles. The speed limit in central London is now 20 mph, meaning that my car does not have any exhaust emissions and therefore does not cause any pollution.</p> <p>Charging electric and hybrid cars for parking permits will reduce the incentive to buy these cars that do not cause pollution.</p> <p>(b) I think these charges are just to fill the blackhole in the transport budget and nothing to do with reducing pollution.</p> <p>Please reconsider these changes.</p>	<p>(a) 7E, 3C, 7A, 7D</p> <p>(b) 8A</p>
301.	[REDACTED]	My concern is the anomaly of my diesel [REDACTED]	2E, 7I

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>██████████ ██████████ Email dated 13th February 2024</p>	<p>██████████, being manufactured in 2014 (██████████), and it is being categorised incorrectly as a pre-2015 car (it will cost me more than it should).</p> <p>The car is Euro 6 and ULEZ compatible, CO2 emissions of 115 g/Km, yet under your proposed scheme it will be charged more on pay and display because it was manufactured prior to 2015.</p> <p>I am happy to support the proposed scheme but only if my car is categorised correctly due to its manufacturing specifications and holding Euro 6 and ULEZ status.</p> <p>Please advise how this essential point can be inputted into the new system starting April 2024 and so I am not unfairly over charged?</p>	
302.	<p>██████████ ██████████ Email dated 13th February 2024</p>	<p>I am concern about increasing charges for residential parking. I am a holder of blue badge and pensioner. I am also tax payer.</p> <p>It is very difficult to keep up with all increases in daily life on fixed income.</p>	3A, 3E
303.	<p>██████████ Resident ██████████ Email dated 13th February 2024</p>	<p>I write to you as a resident and taxpayer in Westminster ██████████ since ██████████ (██████ years).</p> <p>My wife and I are mainly pedestrians and cyclists, or users of common transport systems (bus and underground).</p>	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>However we also bought a car in [REDACTED], after a hiatus of 10 years or so, and benefit from a Westminster resident parking permit (zone C; petrol).</p> <p>My comments:</p> <p>(a) Generally in favour of the new modular policy put in place by Westminster;</p> <p>(b) Probably the policy does not go far enough as other detrimental aspects of car usage and parking occupancy could be taken into account.</p> <p>(c) What are the health benefits / downsides per type of vehicles, beyond CO2 pollution How can health be taken into account such as particles that attack lungs of vulnerable people.</p> <p>(d) Are there lessons from the recent Paris referendum, where the taxation / cost of parking permits is congruent with the size of vehicles, due to the space they use, their weight and the larger risk they may pose to pedestrians, cyclists etc., see https://www.bbc.co.uk/news/world-europe-68196828</p> <p>(e) Can Westminster invest more in research to</p>	<p>(a) 2E</p> <p>(b) 2E</p> <p>(c) Under the emissions-based charging model, the City Council would continue to apply a surcharge on diesel vehicles manufactured prior to 2015 which would be extended to both pay-to-park and residents' permits. These charges are intended to discourage the use of vehicles with higher NOx pollutants. Other considerations are particulates from brake pads; however, there is no easy means to record this output for each vehicle.</p> <p>(d) 2E</p> <p>(e) 1B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>develop more evidence-based policies. Where I live useful role of St Johns Wood Society expert monitoring of PM10 and PM2.5 around schools. https://www.stjohnswoodsociety.org.uk/air-quality</p> <p>(f) Issues of equality and equity amongst impacted business drivers are important, and probably not easy to address. For example critical workers who need their vans and other professional equipment to roll out services in our boroughs. However that should not be an excuse to scupper the scheme, but rather to study solutions with business associations: scrappage and affordable replacement schemes, access to leasing?</p>	(f) 1B
304.	<p>██████████ ████████████████████ Email dated 13th February 2024</p>	<p>I am emailing to object to the planned proposal to withdraw the current Westminster parking concession for electric vehicles (EV's). Please see grounds below:</p> <p>(a) The current low parking rate for EV's encourage a very high take-up of EV's. It provides commuters and shoppers with more accessibility to drive into Westminster and park for longer than 4 hours (especially those that live in more rural areas with limited access to public transport). The current scheme plays a very important role in the country's move towards net zero, encouraging employees to return to the workplace post-COVID and the population supporting the retail industry. I do not believe the TMO has considered these bigger picture facts in the proposal.</p>	(a) 7D

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(b) I experience that most of the heavy carbon emitters in Westminster are the old vans and lorries that are servicing the ever-increasing construction in the borough. Regular EV drivers should not be penalised for this. Not only do these vehicles cause high pollution in the borough, a limited amount of available parking spaces, and traffic at every turn, but it is probably safe to assume that the drivers of these vehicles expense their parking charges to their company. It is neither fair, nor reasonable, to treat owners of electric vehicles (who are typically everyday individuals/commuters/shoppers) at similar weighting to these groups.</p> <p>(c) The borough/TMO could benefit from finding alternative solutions, such as levying a vehicle surcharge during the period of construction work (responsibility of the master contractor) to account for the natural increase in heavy emitting vehicles that the construction industry bring.</p> <p>(d) The consultation makes no mention of the cap on hours at which an electric vehicle may park in the same bay. Under the current scheme, an owner of an electric vehicle may extend their parking session to capture a full day of parking. It appears that under new proposals, parking for EV owners would be limited to 4 hours only. This is a very material change that has not been considered well enough in the proposals.</p> <p>(e) The increase in cost for an EV owner in zone</p>	<p>(b) 7A, 7I</p> <p>(c) 10B</p> <p>(d) The current charges regime allows an electric vehicle to pay for 10 minutes of time in a pay-to-park bay which allows that vehicle to park for the maximum stay period in that bay, which is normally 4 hours. After 4 hours, all vehicles must leave that bay. The proposed charges regime would not change the maximum stay period for vehicles (remaining at 4 hours) but would remove the 10-minute concession for electric vehicles, requiring them to pay a tariff based on their emissions level.</p> <p>(e) 3D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>G for a 4-hour period under the new consultation appears to increase by 381.25%. This increase is completely unacceptable and does not consider EV owners that choose an EV for better cost management. The proposal is a step backwards.</p> <p>(f) The UK government has made great efforts to encourage take up of EV's to help contribute to the country's net zero targets. Examples of these efforts are the great tax benefits (capital allowances/Benefit in Kind) offered to businesses for EV adoption. The current scheme offered by Westminster is one that picks up individuals, not businesses, and I strongly encourage the TMO to reconsider how EV owners are treated in the consultation.</p> <p>Should you wish to have a further discussion on the points above, please do let me know.</p>	<p>(f) 7D</p>
305.	<p>██████████ ██████████ ██████████ Email dated 13th February 2024</p>	<p>(a) I live in a B permit parking zone (██████████) and I have just paid for my parking permit £166 (Increased every year by £10-15). Even though the amount of parking spaces are more limited. Since Aldi opened on Edgware Road people have parked their cars and builders who do not have permits in this zone. This is exceptionally frustrating paying £166 per year and not being able to park my car.</p> <p>(b) Ever since Westminster parking removed the concept of displaying parking permit badges on the front of the car, people are parking fraudulently on</p>	<p>(a) The residents' parking scheme does not guarantee a parking space or that an available parking will be close to a resident's home address. This information is provided to permit holders in the terms and conditions when applying for a permit.</p> <p>(b) 10D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>regular basis. There was a car I reported several times (██████████) who was still parked in the B permit zone every day for 3 weeks.</p> <p>I want the displayed parking permits to be brought back so that residents can see that cars are correctly parking in the B permit Zone. Without the badge anyone can park. We are paying for a service which is not cheap and we expect exclusivity for it.</p> <p>(c) In addition I received an email this morning 27/01/24 to "proposed" resident permit changes and the bottom of the email - "Residents and visitors who drive into Westminster will be able to provide their opinions on and ask questions about the changes via a Traffic Order consultation we are running over a three-week period until 14th February 2024. We would greatly encourage your participation.". When I click on the link there is no requests for opinions and this already seems to be "approved". This is absolutely absurd.</p> <p>(d) It's the rich who can afford low emission cars and you are giving them a free pass to park their huge expensive hybrid / low emission cars which takes up multiple spaces. This is a joke.</p>	<p>(c) 8G</p> <p>(d) 5C</p>
306.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 13th February 2024</p>	<p>(a) I fully agree with the comments set out below, from my colleague, regarding the UNFAIR changes that Westminster is proposing.</p> <p>(b) A cost increase of over 380% is Ridiculous.</p>	<p>(a) 7D, 7A, 7I, 10B, 3D</p> <p>(b) 3D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
307.	<p>██████████ ██████████ Email dated 13th February 2024</p>	<p>Although I do agree moving forward we do need to charge an amount for all Residents parking and think what is proposed is clever, charging those who pollute more pay more.</p> <p>But, I do think it would be more prudent to wait 1 more year before bringing in the charge for electric or hybrid vehicles.</p> <p>I just purchased a hybrid vehicle ██████████, did not purchase fully electric as charging points and other things influenced my decision. If I did know Westminster was bringing in charging for Hybrid I am not sure I would have purchased Electric just yet but it would have been good to have been aware of the proposed new charging.</p> <p>In another year hopefully fully electric will be more available, cheaper, more charging points and therefore more likely for residents thinking of purchasing or changing their car will opt for electric which would certainly benefit the whole Westminster area.</p>	2E
308.	<p>██████████ ██████████ Email dated 13th February 2024</p>	<p>I object to the Tariff and Permit Pricing Restructure on the following grounds:</p> <p>(a) Ineffective: parking itself does not cause emissions; the structure of parking charges will therefore not be effective in improving air quality. Charges are based on CO2 emissions, but CO2 emissions are not themselves a problem, again</p>	(a) 7B

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>meaning the structure of parking charges will not be effective in improving air quality and will result in injustices.</p> <p>(b) Complicated: the bands are complicated and partly arbitrary, will encourage added complication in future years, and can't be shown in the street, reducing transparency and convenience.</p> <p>(c) Unjust: because parking itself doesn't affect emissions, the restructure punishes owners of older cars (who may be of reduced means) who don't use them often, without any benefit to air quality.</p> <p>(d) Disproportionate: Band 5 is by far the most populated group and is subject to a large fee increase. The maths indicates that they are being used to fund a revenue increase. Why such a large increase (£166 to £214) for band 5, especially compared to band 4 (£139)?</p>	<p>(b) 4A</p> <p>(c) 3A</p> <p>(d) 5E</p>
309.	<p>██████████ ██████████ Email dated 13th February 2024</p>	<p>(a) We are objecting to the proposed changes to the resident permit charges. We already have a hybrid vehicle and you will make it more expensive for us. We are already struggling with the cost of living and this seems like just another way to take more money from our pockets.</p> <p>(b) We also object that the consultation has not been properly undertaken. We are local residents and only heard about this from an email by our local residents association today - one day before the end of the consultation period.</p>	<p>(a) 3E, 8A</p> <p>(b) 8D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(c) The changes are presented as a fait accompli - already done deal, rather than as a consultation. It is confusing. And the only way to give feedback or object is by writing you an email or letter, which is difficult and onerous for most people to do. It's like the whole process is designed to bulldoze it through.</p> <p>We are your local residents and you should be serving us rather than trying to avoid our input and fleecing us for funds.</p> <p>I look forward to hearing from you on this.</p>	<p>(c) 8G</p>
310.	<p>██████████ ████████████████████ Email dated 13th February 2024</p>	<p>(a) I write to object to the changes to parking charges for kerbside users who are non-residents of the Borough. Given that my vehicle has zero emissions, I am shocked to see the incredible increases in the per hour rates you are imposing from March 18, 2024.</p> <p>I own a fully electric vehicle and have enjoyed the low parking tariff when I drive into Westminster for work and pleasure and park on Pay and Display. Both are revenue generating activities for the Borough and the UK economy. The increase will have the following negative effects:</p> <p>(b) Prevent older, EV owners from coming into London and spending money, thereby harming the local and national economy.</p>	<p>(a) 7A</p> <p>(b) 12A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(c) Force people to use the extremely expensive, inefficient, strike-ridden and opaque train services causing stress and anxiety.</p> <p>(d) Prevent the take-up of fully EV cars which is a stated national government policy.</p> <p>(e) Be a retrogressive step for Westminster which is considered to be a progressive borough.</p> <p>The system as it is works very well and does not need changing. Please think again and keep the incentive to drive into London for work and leisure affordable for fully EV cars.</p>	<p>(c) 6D</p> <p>(d) 7D</p> <p>(e) 0A</p>
311.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 13th February 2024</p>	<p>(a) I would like to share my frustration with the proposed plan to charge electric parking permits £40-80 a year. As a local resident and owner of such a permit I object this proposal. The government's pledge to go green was associated with incentives for people to go electric. One of those incentives was a free parking permit. Given the sudden change, lack of charging facilities available to residents (most charging bays are occupied by non electric vehicles or Ubers not residing locally) and overall crash of electric cars market fuelled by the government's u-turn on the ban of petrol/diesel cars, I am seriously considering getting a diesel car which will not help the environment but will help my pocket. There are many more people thinking the same way.</p> <p>(b) Perhaps charging non-residents a higher</p>	<p>(a) 7D, 6A</p> <p>(b) 7I</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		price for entering the area and non-residents for charging locally would be a better idea?	
312.	<p>██████████ ██████████ Email dated 13th February 2024</p>	<p>(a) I object to the proposed resident parking charges, they are Not appropriate as residents do not use their cars particularly frequently compared to those non-residents passing through Westminster including the various tradespeople and delivery drivers.</p> <p>(b) They appear to be a “money grab” on residents to be enacted swiftly, rather than a fully reasoned approach to reducing pollution across Westminster.</p> <p>Including electric vehicles seems irrational.</p> <p>(c) To introduce such high charges now to meet a target many years away is inappropriate as most of the most polluting vehicles will not be being utilised in the next very few years.</p>	<p>(a) 7C</p> <p>(b) 8A, 8E</p> <p>(c) 5F</p>
313.	<p>Resident ██████████ Email dated 13th February 2024</p>	<p>I am writing to object to the planned changes to the residents' parking scheme for Westminster as a resident in ██████████ who regularly pays for and uses on-street residential parking. Under the planned changes, which come into effect as from Monday 18 March 2024 for pay-to-park and from 1 April 2024 for resident permits (subject to the results of the Traffic Order consultation), vehicles will be charged primarily based on their level of Carbon Dioxide (CO2) emissions.</p>	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>As a Westminster resident and owner of a vehicle, for which I pay road tax and off-street parking, I object to the planned changes on the following points:</p> <p>(a) The new charges are unfair and disproportionately penalise resident drivers who may own older or larger vehicles, regardless of how often or how far they drive. They also penalise drivers with disabilities whose modified vehicles may be older and fall into the bracket for higher charges, as well as those with limited means who have older vehicles and who are not able to change them to newer greener vehicles due to the cost-of-living constraints.</p> <p>(b) The new charges are ineffective and counterproductive as they do not reduce emissions when the vehicles are parked, and may in fact encourage more driving within the area to avoid paying for parking.</p> <p>(c) The new charges are unreasonable and unjustified as they do not reflect the actual costs of providing parking services and may be seen as a revenue-raising scheme rather than an environmental measure. There already is an emissions-based tax to use the road. It is unclear as to how the increased charges for parking will control vehicle emissions. At best, the scheme appears to be taxing residents for owning and parking a vehicle next to their homes and does not contribute to an emission-free zone.</p>	<p>(a) 3A, 7C</p> <p>(b) 12C</p> <p>(c) 8A, 7B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(d) I recommend that the council reconsider its plans and look for alternative solutions that are fairer, more acceptable to the residents and beneficial for both council and residents. It should also be transparent in its consultations and allow for the residents' voices to be heard and taken into consideration before any charges are imposed on residents.</p>	<p>(d) 8D, 8G</p>
<p>314.</p>	<p>██████████ Resident ██████████ Email dated 13th February 2024</p>	<p>I am writing to object to the planned changes to the residents' parking scheme for Westminster as a resident in ██████████. I use on-street parking, and have a car.</p> <p>From my understanding of the planned changes, that take effect from 18 March 2024 for pay-to-park and from 1 April 2024 for resident permits (subject to the results of the Traffic Order consultation), vehicles will be charged primarily based on their level of Carbon Dioxide (CO2) emissions.</p> <p>I object to these changes for several reasons:</p> <p>(a) I think the charges are unfair. They penalise resident drivers who may own older or larger vehicles, regardless of how often or how far they drive.</p> <p>(b) The charges are unreasonable: Motorists already pay fuel taxes, and those with larger engines will, other things being equal, be paying for CO2 emissions anyway as a result. The planned</p>	<p>(a) 3A, 7C</p> <p>(b) 7L, 8A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>new charges are, in my view, largely a revenue-raising measure, not an environmental one, although given the times in which we live it appears no tax rise seems to be proposed unless it is wrapped up as a green measure.</p> <p>I recommend that the council reconsider its plans and look for alternative solutions that are fairer, more acceptable to the residents and beneficial for both council and residents.</p>	
315.	<p>██████████ ██████████ Email dated 13th February 2024</p>	<p>(a) I do not object to changes to the criteria for parking permit Fees, but I strongly object to your proposed changes on various grounds.</p> <p>(b) Firstly ULEZ has already been introduced so emissions should not be a basis for parking charges.</p> <p>(c) Engine size should not be the only criteria, it should be linked to size too.</p> <p>I drive a ██████████ with an engine size of 599cc. However I have always had to pay the same amount as a mega large vehicle with a huge engine taking up twice the space. Surely part of the object is to free up parking space as well as improve traffic flow. By encouraging the use of ultra small cars in cities this would move to facilitate both.</p> <p>A more intelligent system of Charge bands, rather like council tax, would be straight forward, better for the city and generate more revenue for</p>	<p>(a) 2E</p> <p>(b) 7B</p> <p>(c) 7I</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>Westminster.</p> <p>I suggest the below:</p> <p>A. Vehicles 2.5 meters in length and 1.5 meters in width and under with an engine size below 800cc. £75</p> <p>B. Vehicles under 3.2 in length and 1.7 in width with an engine size below 1400cc. £ 125</p> <p>C. Vehicles under 4 meters in length and 1.9 in width with an engine size below 2500cc £ 270</p> <p>D. Vehicles over 4 meters and 1.9 in width with an engine size above 2000 but below 3000. £350</p> <p>E. Luxury supercars with engine sizes above 3,000. £ 1,000</p> <p>(d) The super rich with their super expensive cars can afford to and mostly would not object to paying more, while impoverished Artists like me could afford to Park and facilitate their art work transportation needs.</p> <p>(e) Furthermore the width of a vehicle is as important as the length to insure a parked vehicle remains within the cities largely 2 meter wide</p>	<p>(d) 3B</p> <p>(e) 71</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		marked parking spaces.	
316.	<p>██████████ ██████████████████████ Email dated 13th February 2024</p>	<p>Thanks for sending through the information on this. I do not agree.</p> <p>(a) On the basis you are making charges to discourage cars / emissions in London I don't understand how permitting a household to have more than 1 parking permit supports this.</p> <p>(b) Resident spaces have been decreasing due to the encouragement of cycles and motor cycle spaces. Increasing the number of car permits per household will exacerbate the problem for resident parking.</p> <p>(c) There are a lot of flat dwellers in Westminster who are not able to get easy access to electric charging stations and so are not necessarily in a position to change to the less emission producing cars.</p>	<p>(a) 5A</p> <p>(b) 5B</p> <p>(c) 6A</p>
317.	<p>██████████ ██████████████████████ Email dated 13th February 2024</p>	<p>(a) Your statement opens with 'the City of Westminster has some of the highest carbon emissions and worst air quality of any national local authority' however the ULEZ has been operational in this Borough for almost FIVE years and the Mayor of London in the last ULEZ extension consultation stated that the reason he wanted permission to expand the ULEZ to the other London boroughs was because the ULEZ in central London had been so effective at reducing pollution in Central London, so how can this be so</p>	<p>(a) 11A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>contradictory?</p> <p>(b) So clearly these types of measures do not work and demonising diesel vehicles and penalising all drivers even further is an utter disgrace and a money-motivated move, so I am wholly opposed to your proposals to charge us further in this manner.</p> <p>(c) Personally I am hugely dismayed that I live in your Borough and already feel utterly victimised for having a diesel vehicle - that I was encouraged to purchase at the time, and now due to ULEZ I can't afford to replace as I'm paying a fortune in ULEZ and ridiculous fuel prices etc, so am caught in a trap not being able to finance a new van. Even though you state they have low CO2 emissions, your proposals want to punish me further and utterly destroy me financially and emotionally. These proposals are an utter disgrace in victimising people like the ULEZ does.</p> <p>(d) My van is where my carbon footprint is highest yes, but I don't use it every day, I haven't flown anywhere in 30 years, I recycle and up-cycle religiously and I don't eat meat, so my carbon footprint is really low compared to many people who drive 'cleaner vehicles'. Airplane traffic pollution is way higher than diesel vehicles but nothing is being done about that! Instead drivers are continually under fire with charges across the board from permits, parking charges, fuel price hikes, insurance, road tax, toll roads, low emission</p>	<p>(b) 8A</p> <p>(c) 7E, 3E</p> <p>(d) 7L</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>zone, etc etc - the list just grows and grows. As drivers our human rights are being challenged constantly.</p> <p>(e) Moreover in response to the current two vehicle registration marks (VRMs) on a single permit policy, your new policy would mean each VRM would instead be covered by a single, individual permit, this is just the worst proposal for which I also oppose. For myself with a van, and a scooter for commuting, along with the £50 additional diesel charge and then having to get a motorcycle permit and pay an additional £50 second permit fee - these changes alone would mean I have an increase of £161 prior any increases in price of my van's actual residents parking permit! This is insanely greedy and disgustingly singularly penalising. I will be hit by three additional charges on top of an increased permit price!! It's utterly disgraceful, a money-making scheme to destroy people on lower incomes and make our lives even more miserable and make me feel extremely vulnerable and trapped in my home. [REDACTED]</p> <p>[REDACTED] and so I'm 100% reliant on my vehicles but am already struggling financially to maintain them and this out-prices me entirely and will destroy any semblance of a decent life for me as increasing costs will inhibit me (even more than the ULEZ does currently) travelling anywhere to support a healthy, social and happy lifestyle, and so will have a life-changing negative impact on my</p>	<p>(e) 11C, 3A, 8A, 3B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>emotional and mental health and overall wellbeing.</p> <p>(f) I would add that your proposal to increase an individuals permit allowance to three permits per person - from one at any time (maximum two on a permit but only one allowed to park at a time in restricted times) in an SPA area - already recognised for not having enough parking places for the vehicles that already hold permits, is appalling, it's irresponsible and I can't see how it can possibly 'align with the Fairer Westminster Strategy' when there's absolutely nothing fair about an individual parking up to three vehicles at the same time! I have wasted hours and hours driving around day in day out trying to find a place to park when I return home in overcrowded streets. I often have cried in desperation because there is nowhere to park up as are there are just not enough parking spaces currently. With this proposal parking can only get worse, way worse. People with lots of money and more than one vehicle will have a permanent parking spot - moving one vehicle in and one out continuously, so there will no longer be times they're not taking a space - which gives others parking opportunities, because they can't drive two or three vehicles at the same time, plus they'll taking up an additional spot with the second or third vehicle in a recognised SPA! This is really really bad news and makes me utterly depressed. So, I am absolutely and entirely opposed to such proposals as they are unjustified, not appropriate nor suitable in this borough, especially my Zone where there currently aren't enough parking places</p>	<p>(f) 5B, 5C, 3E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		and feel it discriminates against normal residents and drivers with limited budgets who are being battered by the cost of living crisis etc already.	
318.	<p>██████████ ██████████ Email dated 13th February 2024</p>	<p>██████████ restates content from the news article on the City Council's web site at https://www.westminster.gov.uk/news/westminster-launches-emissions-based-parking-charges-tackle-poor-air-quality in his opening remarks.]</p> <p>(a) BACKGROUND</p> <p>WC have to be congratulated on their policy to improve air quality and encourage the use of low or zero polluting vehicles over the past years.</p> <p>They have accelerated the number of charging points and maintained nominal charging for EV's, unlike other London Boroughs. WC has been a true leader to date in this regard.</p> <p>(b) It is hard to see the rationale for changing the charging policy for zero emission EV's, thereby removing WC's stated aim of encouraging the use of EV's and contradicts WC's exemplary record to date on this aspect of its climate credentials.</p> <p>(c) CONSULTATION</p> <p>This is not a genuine exercise. Allowing a 3 week period from January 25 - February 14 with no meaningful publicity and announcing implementation of the new policy on March 18, ie 4</p>	<p>(a) Noted.</p> <p>(b) 7A, 7D</p> <p>(c) 8E, 8G</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>weeks after the end of the consultation, makes it wholly apparent that WC intend to proceed with the changes in any event.</p> <p>(d) 3.PERSONAL STATEMENT</p> <p>I have worked in Westminster for well over 2 decades. I have also had the privilege of living in Westminster for several years some while ago.</p> <p>I have had a zero emission EV or hybrid car since [REDACTED] and a zero emission EV again since [REDACTED]. I use public transport whenever possible. My [REDACTED] is in Westminster and my wife and I pursue many cultural, philanthropic activities and interests in Westminster. We regard ourselves as so fortunate to live in the great city of London, where I was born, grew up and currently live.</p> <p>4.WC PROPOSAL COMMENTARY AND OBJECTION.</p> <p>The stated objective is to encourage low-polluting vehicles and discourage high polluting vehicles.</p> <p>(e) I agree entirely with the proposal to increase charges on high emission vehicles but NOT zero emission vehicles.</p> <p>How is this objective achieved, by withdrawing the current regime for zero emission cars. This will now be £4.62 per hour in Zone F & G - a massive increase and wholly contradictory to the stated</p>	<p>(d) Noted.</p> <p>(e) 7A, 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>objective.</p> <p>It is, with respect, no defence to say this new massive charge might be lower than other boroughs. WC has shown its leadership on supporting zero emission EV's and should continue to do so.</p> <p>Now is hardly the time with the current climate emergency, for WC to reverse its current excellent position on this. It makes NO sense whatever.</p> <p>(f) One can only assume that this is being driven by short- term additional revenue raising motives, to the detriment of air quality for all who live, work and visit Westminster.</p> <p>(g) Supporting zero EV's and their contribution to the boroughs environmental and health objectives should be a continuing priority for WC and its leadership, both political and municipal.</p> <p>The current proposal for EV's is diametrically opposed to WC's stated objective and will prejudice future generations by withdrawing the current support for zero emission cars.</p> <p>I urge WC to have a proper consultation and reflect seriously and responsibly on the matters raised above.</p> <p>It should withdraw the proposal to increase the charges in relation to zero emission vehicles. It is</p>	<p>(f) 8A</p> <p>(g) 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		flawed and opposed to WC's own stated objectives.	
319.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 13th February 2024</p>	<p>Thank you for giving me the chance to respond to your consultation, in response to your proposal I would like to register my opposition to your proposed plan.</p> <p>(a) I have friends and family who will be directly affected by your plans and I have seen the stress and financial hardship that the vehicle restrictions in central London cause on a daily basis. Parking in Central London these days is near impossible. I changed recently from a diesel to an electric vehicle due to the expenses of the daily ULEZ, but trying to find somewhere to park in Central London last Sunday to attend [REDACTED] was awful; [REDACTED] so required me taking her by vehicle, and it was impossible to park near the church.</p> <p>(b) Could you please clarify your statement that 'the City of Westminster has some of the highest carbon emissions and worst air quality of any national local authority' - at the GLA Plenary Meeting in October 2022 the Mayor of London stated that the reason he wanted permission to expand the ULEZ to the outer London boroughs was because the ULEZ in Central London had been so effective at reducing pollution in Central London, and that outer London boroughs had considerably worse air pollution. This statement - that the outer London boroughs had the worst air pollution - was a main argument presented</p>	<p>(a) 3A, 3B</p> <p>(b) 11A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>consistently by the Mayor throughout the process of implementing ULEZ expansion.</p> <p>With all due respect, both statements cannot be true. Either the City of Westminster has the worst pollution (despite years of ULEZ restrictions), or the Outer London Boroughs have the worst pollution (as stated by the Mayor to support the expansion of the ULEZ).</p> <p>I am keen to understand the data upon which your statement is based and look forward to receiving your comments.</p>	
320.	<p>██████████ ██████████ Email dated 13th February 2024</p>	<p>I am against the proposal of charging EV vehicles for resident permit parking. This was one of the incentives to move to an EV and yet again the powers that be are shifting the goal posts to extract more money from residents! Before this we were encouraged to move to diesel only to end up paying for ULEZ on top of congestion a few years later When does the gouging and milking of residents stop? This leaves very little trust in those responsible.</p>	7D, 8A, 7E
321.	<p>██████████ ██████████ Email dated 13th February 2024</p>	<p>Whilst your new resident's permit fees will not affect me significantly, I believe it is either flawed or disingenuous in the so-called justification, and I object to it strenuously on principle.</p> <p>(a) Whilst clean air is a laudable aim, I firmly believe that most daily traffic in Westminster consists extensively of non-resident vehicles either</p>	(a) 7I

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>passing through, or plying their trade in Westminster. This ad hoc traffic is already discouraged either and taxed by the Congestion Charge, or/and for older vehicles, the deeply unpopular but here to stay ULEZ charge.</p> <p>(b) Whilst I am a resident, on the electoral role, home owner and rates payer, I am not principally based in London, but live predominantly in [REDACTED]. I only drive to London if I have bulky items to transport, or if I am using it as a base to attend an event down South. In that sense, I am only 'passing through'. I own more than one car, but would only bring one car into London, depending on the nature of the reason for not taking the train (my usual and preferred means of travelling to London). For what it is worth, both my cars are Euro6 compliant. When in town, my chosen transport is Boris Bike, or tube when the weather is bad. For shorter journeys I walk. Most of my neighbours do not use their cars on a daily basis either, so it is unjust to levy yet another charge for use, when our vehicles, as residents, are barely used, and the charge is stated as being for a parking permit.</p> <p>(c) As I will only ever have one vehicle in London at any one time, whilst I accept a fee should be payable for each car to cover the admin cost, to seek an additional charge over and above the standard resident's permit charge can only be characterised as yet another stealth tax and unnecessary revenue-raising exercise. I already</p>	<p>(b) 7C</p> <p>(c) 8A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>pay rates when I am rarely in occupation, so do not utilise the full range of services for which I have paid, but I accept this is a necessary consequence of work requiring me to be in more than one location.</p> <p>(d) You have been elected to improve lives for the residents of the borough. This will do nothing to achieve that (as above, the bulk of the traffic on the streets is not residents driving around). I believe keeping traffic moving, rather than being strangled by measures sneaked in under cover of Covid, and requiring cars to run at a very inefficient 20mph max, when not stationary because of those measures, will honestly make significant strides towards realising those goals you have hi-jacked to justify your stealth tax and interference.</p>	<p>(d) 10B, 8A</p>
322.	<p>██████████ ████████████████████ ██████████</p> <p>Email dated 13th February 2024</p>	<p>(a) It is excessive to allow each resident the opportunity to purchase permits for three cars, this should be reduced to two. There is a lack of residents parking in many streets and the Council should not be encouraging additional vehicle ownership by offering the opportunity to park three vehicles per person. The additional £50/£100 charges for additional cars will not be a sufficient deterrent. Two cars per resident is reasonable.</p> <p>(b) On a separate but related matter the Council should not permit the large, box like, stand alone fast charging units for EVs to be installed, such as the one to be found in Eaton Square. They emit noxious fumes & heat from their many vents when</p>	<p>(a) 5B</p> <p>(b) The representation is noted and has been passed to the relevant team.</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>in use which are a danger to any pedestrian but particularly any asthma sufferers walking past. They take up too much space on the pavement. They are ugly, not in keeping with the area. Please pass these remarks onto the relevant person.</p>	
323.	[Email related to separate scheme: removed from report]		
324.	<p>██████████ Resident ████████████████████ Email dated 13th February 2024</p>	<p>(a) Permit charge increase I am against any increase in permit charges without an associated increase in coverage.</p> <p>For example I have C zone and live at the end of the ██████████. There is no nearby supermarket or swimming pool that I need regularly and I have to go to ██████████ zone B although it is under a half mile away.</p> <p>Parking on a metre there is difficult due to lack of numbers. Can you make it both zones B and C?</p> <p>SUV's should have prohibitive charges, they take up more space. Also they should be discouraged as their different bumper height means they cause more damage, as well as being more polluting if they are gas.</p> <p>(c) EV incentive I am against a reduction in the incentives for electric car parking and permit cost I have an electric vehicle for eco reasons, which is more costly than a regular petrol, and it has been really</p>	<p>(a) At the present time, there are two areas where permit holders for Zones B and C may use the residents' permit parking places with either permit. These are the area sandwiched between Harrow Road and the Grand Union Canal and the area between Clifton Gardens / St. John's Wood Road and the Canal. There are no plans at the present time to provide additional areas where more than one zonal permit can be used as this would place additional parking pressure on residents of those areas.</p> <p>(b) 7I</p> <p>(c) 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>helpful that parking and congestion charging has been cheaper to help offset the really high outlay and insurance costs. There will be no incentive for folk to keep their electric cars or buy them with the minute differential in charges you are proposing; they need to be far cheaper than for petrol cars and reflect the lack of environmental problems that you gain from. The purchase incentives have been removed and still only 1/30 cars are electric.</p> <p>(d) Parking at charge points I need to charge every couple of weeks overnight and the closest points in [REDACTED] are frequently occupied, whilst those in [REDACTED] are not restricted to electric vehicles and get parked up. It is not really safe for me to have to walk far at night from a more remote charge point that happens to be available; please make all charge points parking spaces just for electric cars charging.</p>	(d) 6A
325.	<p>[REDACTED] [REDACTED] Email dated 13th February 2024</p>	<p>(a) I am completely against these new tariffs. Rebranding as “fairer” Westminster is laughable as it is poorer and low wage income families that have older cars so it is actually discriminatory. New cars that fit the requirements for affordable parking and resident permit rates are extremely expensive so Westminster is actually favouring the wealthy and coercing the rest of us to get into debt by purchasing new cars. Westminster should admit that it is not Fairer but hypocritical: Westminster’s proposal statement says the improvement of air quality is an important priority for the council and</p>	(a) 3A

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>these new parking tariffs support this aspiration.</p> <p>(b) The air quality of Westminster is mostly affected by the construction industry, not vehicles. It is completely unfair to be charging us and not go after an industry which not only causes worst air pollution, but is also completely immoral with its carbon footprint and waste. These many large scale construction sites have caused long term disruption to all Westminster residents whom get nothing from them. Recent cases in point: the Paddington cube, Whiteleys on Queensway, Park Modern on the Bayswater Road, 334 Oxford Street (formerly) Debenhams, (the list continues) have released hundreds of thousands in CO2 tonnes. And Westminster continues to welcome more such developments, with 456 - 472 Oxford Street - Project Swan, Mixed Development (M&S flagship store) being a case in point: The proposed demolition and rebuild would release 40,000 tonnes of CO2, equivalent to driving nearly 100 million miles!</p> <p>(c) Car owners are already paying an extra tax with the ULEZ. It is utterly unfair to be taxing through resident permits, especially as these cars might be used less frequently due to the ULEZ. Introduction of these higher and extra charges may even have an adverse effect and people may end up using their cars more as a means to get more out of their extra expense.</p>	<p>(b) 10B</p> <p>(c) 7L</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
326.	[Email related to separate scheme: removed from report]		
327.	<p>██████████ ██████████ ██████████</p> <p>Email dated 13th February 2024</p>	<p>I VERY STRONGLY OBJECT to these new proposals!! When a car is parked it is not emitting anything!!! Many of us can't afford a new car and since the introduction of the ULEZ are using it only for absolutely necessary journeys - or to leave London on long journeys where taking a family with elderly relatives makes it impossible to use other methods of transport! Now we are going to be penalised yet again!</p>	7B, 3A, 3B
328.	<p>██████████ ██████████ ██████████</p> <p>Email dated 14th February 2024</p>	<p>I oppose to the enormous increase in price of EV parking in Westminster. I work in ██████████</p> <p>Increasing the tariff will have an adverse effect to our monthly expenditure as a household. We bought an EV to as it was cost effective due to travelling to London. With this new tariff it will not be affordable.</p> <p>Please do not change the tariff by such a massive amount. Make it £2 for 4 hours, that's over 100% of the existing tariff.</p>	3D
329.	<p>██████████ ██████████ ██████████</p> <p>Email dated 14th February 2024</p>	<p>This message represents an objection as invited by Westminster City Council's (WCC's) announcement by email etc on 28 Jan 2024 that it plans to start charging for resident and non-resident parking on the basis of a ULEZ-style emissions-based algorithm. This objection is lodged on behalf of FREDA, the umbrella organisation recognised by</p>	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>WCC that brings together representatives of all the Residents' Associations of Pimlico.</p> <p>I presented the following objections at a meeting of FRED A on 13 Feb 2024. They were debated and agreed unanimously by the representatives. Councillor Jason Williams pointed out that WCC's parking charges are nonetheless comparatively low.</p> <p>(a) An unfair tax</p> <ul style="list-style-type: none"> • Like Sadiq Khan's controversial ULEZ scheme, this emissions-based charging plan penalises those who have older petrol / diesel vehicles and can least afford to acquire up-to-date electric vehicles. • It is essentially an unfair and regressive tax. <p>(b) Stealth tax hike</p> <ul style="list-style-type: none"> • The net effect of the plan is to increase WCC's expected annual net revenue from parking charges by 33%. That 33% increase figure is not shown in the WCC announcement but has been confirmed by WSP who are handling this consultation. That omission is bordering on the deceitful. <p>(c) "Greenwashing"</p> <ul style="list-style-type: none"> • WCC attempts to justify the plan by reference to climate change. There is little doubt that the climate is changing, as indeed it always has, but there is considerable uncertainty as to the extent to which this change is due to exploitation of fossil 	<p>(a) 3A</p> <p>(b) 8A</p> <p>(c) 11A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>fuels, other human activity or natural causes. The environmental impact of WCC's tax hike is so marginal that clothing it in green is at best green washing and fashionable virtue signalling.</p> <ul style="list-style-type: none"> • London is the largest conurbation in the UK so it is unsurprising that it emits a lot of CO2. But Westminster is as windy as anywhere else (we are endlessly told that we need more wind farms) but obviously the wind blows polluted air away. • WCC attempts to justify the plan by reference to a target for 2040. It is hard to believe that by that time, 16 years hence, these ULEZ charges will make any difference and almost all of the old cars blamed here will have been scrapped by then anyway. <p>(d) Electric cars are not so green.</p> <ul style="list-style-type: none"> • They are expensive to make, require rare minerals to be dug up by low paid workers in African mines. • Their batteries cannot be effectively recycled once dead. • They catch fire often- potentially lethal in an underground car park. • They are more costly to repair and insure. • They are much heavier than petrol / diesel vehicles • So they cause more pot-holes and road damage and far more particulate pollution from wear to their tyres. • They often require fossil fuel anyway to generate electricity. 	<p>(d) 9A, 10F, 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(e) Complexity</p> <ul style="list-style-type: none"> • The WCC announcement makes it very difficult for a resident to find out which Band the DVLA and WCC together consider his car to be in. It refers to on-line documents which run to tens of pages. • The algorithm is so complex that it is impossible for the non-resident to find out from a notice by the parking bay how much his parking will cost. • Many other London Boroughs may have adopted this algorithm but that does not make it right. Is the scheme designed by Fujitsu? 	(e) 4A, 4B
330.	<p>██████████ Eccleston Square Residents Association ██████████ Email dated 16th February 2024 (Reply to ██████████'s email)</p>	<p>I note your email to WCC objecting to the new parking permit arrangements.</p> <p>ESRA cannot stand behind your email. Further, you have put ██████████ in an awkward position in appearing to endorse your email on behalf of ESRA, when neither he nor other delegates had a chance to review it.</p> <p>As I understand it from ██████████, what was agreed at Tuesday's meeting was that there were grounds for an objection on the basis of the vagueness of the new parking charges and the negative impact it would have on residents who own old vehicles and might not have the resources to change to a new one or to an EV.</p> <p>This may be fair, but to couch the objection in the</p>	4A, 3A

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>language of climate sceptics takes it well beyond the mandates both of ESRA and FRED A. We at the ESRA Committee do not, as individuals, agree with the language of your objection. More importantly, we have no idea what our members think about these issues. We might expect that the opinion will be typical of the UK urban population, which as you will know is broadly in favour of policies to limit fossil fuel emissions.</p> <p>The ESRA Committee do not feel that we have the mandate, or the qualifications, to make statements about climate change.</p>	
331.	<p>██████████ ██████████ Email dated 14th February 2024</p>	<p>I thoroughly disagreed with the proposed changes to the parking permit charges. Another money making scam from Khan & his cronies hiding under the umbrella of improving the environment. Utter nonsense!</p>	<p>8A. Please note that the proposals for emissions-based charging have been put forward by Westminster City Council, not Transport for London and, as such, the proposals have no connection to the Mayor of London.</p>
332.	<p>██████████ ██████████ Email dated 14th February 2024</p>	<p>(a) I am writing to express my deep concern and strong objection to the proposed withdrawal of benefits for electric vehicles in London, particularly the introduction of full parking charges. This move raises apprehensions that it might be perceived as a money-raising exercise rather than a thoughtful decision for the benefit of our environment.</p> <p>(b) Electric vehicles have played a crucial role in mitigating climate change and improving air quality within urban areas. The current incentives, including reduced or waived parking charges, have significantly contributed to the adoption of electric</p>	<p>(a) 8A</p> <p>(b) 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>vehicles and the overall promotion of sustainable transportation choices.</p> <p>However, the potential withdrawal of these benefits, coupled with the introduction of full parking charges, sends a worrying message. It may be interpreted as prioritizing revenue generation over the continued support and encouragement of environmentally friendly transportation alternatives.</p> <p>I strongly urge you to reconsider this decision, taking into account the potential negative impact on the adoption of electric vehicles and the overall progress toward a more sustainable future. It is essential to foster an environment that encourages individuals to make eco-friendly choices, rather than imposing additional financial burdens.</p> <p>Thank you for considering my concerns regarding the potential perception of this decision as a money-raising exercise. I trust that the government will prioritize the long-term environmental benefits that electric vehicles bring to our city.</p>	
333.	<p>██████████</p> <p>██████████</p> <p>Email dated 14th February 2024</p>	<p>(a) I would like to make a comment on the Tariff and Permit pricing structure. I totally and utterly disagree with the proposals. City of Westminster residents are NOT responsible for Westminster's pollution and therefore should not be penalised for this. This is just another tax by Westminster labour who are coming after our hard earned money.</p> <p>(b) We also cannot discourage others who do not</p>	<p>(a) 11B, 8A</p> <p>(b) 12A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>live in Westminster from coming to Westminster to spend money by charging extortionate amounts for parking. This will affect businesses.</p> <p>(c) City of Westminster's own calculations which they have made public show that 84% of air pollution in Westminster comes from buildings! What are they going to do now?</p> <p>I am totally against these increases as I am against the increases in service charges, council tax and any other increases which Westminster labour will put in place which is guaranteed.</p> <p>(d) City of Westminster has functioned successfully for many years and now Westminster labour are about to tax us into oblivion. My annual costs have already gone up by around £1k per annum under Westminster labour. It's almost not worth working under Westminster labour as they hate successful hard working people that do well for themselves.</p> <p>No to any increases in residents parking permits, street parking or any other vehicle linked increases.</p>	<p>(c) 10B</p> <p>(d) 3C</p>
334.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 14th February 2024</p>	<p>(a) I wholeheartedly disagree with the new parking permit structure. I have a small car which I have driven for over 20 years it's 1207cc so takes me over the 1200cc threshold. I don't drive my car that often it had less than 75,000 on the clock. I use it mainly for visiting ██████████ at short notice. She lives ██████████. Also for when I</p>	<p>(a) 7C, 3B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>start work on occasion before public transport starts.</p> <p>(b) There are many people in the same position as me who do not use their cars frequently but need a car to use out of town to visit family and take them out. My car may be old, but it is not environmental friendly to send old cars to landfill. It take a lot of energy to produce a new car. I also cannot afford the cost.</p> <p>(c) I feel these new parking rates are just another excuse to fleece the motorist.</p>	<p>(b) 9A, 3A</p> <p>(c) 8A</p>
335.	<p>██████████ ██████████ Email dated 14th February 2024</p>	<p>(a) I am writing to express my deep concern and strong objection to the proposed withdrawal of benefits for electric vehicles in London, particularly the introduction of full parking charges. This move raises apprehensions that it might be perceived as a money-raising exercise rather than a thoughtful decision for the benefit of our environment.</p> <p>(b) Electric vehicles have played a crucial role in mitigating climate change and improving air quality within urban areas. The current incentives, including reduced or waived parking charges, have significantly contributed to the adoption of electric vehicles and the overall promotion of sustainable transportation choices.</p> <p>However, the potential withdrawal of these benefits, coupled with the introduction of full parking charges, sends a worrying message. It may be</p>	<p>(a) 8A</p> <p>(b) 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>interpreted as prioritizing revenue generation over the continued support and encouragement of environmentally friendly transportation alternatives.</p> <p>I strongly urge you to reconsider this decision, taking into account the potential negative impact on the adoption of electric vehicles and the overall progress toward a more sustainable future. It is essential to foster an environment that encourages individuals to make eco-friendly choices, rather than imposing additional financial burdens.</p> <p>Thank you for considering my concerns regarding the potential perception of this decision as a money-raising exercise. I trust that the government will prioritize the long-term environmental benefits that electric vehicles bring to our city.</p>	
336.	<p>██████████ ████████████████████ Email dated 14th February 2024</p>	<p>(a) I have enjoyed for many years Westminster's forward looking attitude to EV's both in terms of providing infrastructure for charging and also the incentives for parking.</p> <p>I have no doubt that these policies have contributed to a substantially higher proportion of residents in Westminster choosing to drive an EV than the national average.</p> <p>(b) You clearly feel that, now momentum has been created, you can afford to withdraw the support. I strongly believe that this is a misplaced feeling.</p>	<p>(a) 7A, 7D</p> <p>(b) 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>As the national evidence has shown - the reduction in incentives from the government has already slowed down EV adoption to a level which now means that targets for adoption by (now) 2035 will be missed. Westminster's removal of incentives will add to this brake on the momentum.</p> <p>This is not the time to pull back an admirable policy.</p> <p>I recently served on Westminster's Climate Change Assembly and there was much praise for the Council's policies towards EV's. This credit will quickly unwind if you follow your proposals.</p> <p>(c) I would further question why having a larger EV battery should incur a "penalty". There is no evidence that larger vehicles cause more environmental damage and larger batteries have the advantage that they relieve congestion on the charging network - likely to become an issue in the coming years despite Westminster's innovative policies.</p>	(c) 11E
337.	<p>██████████ ████████████████████ Email dated 14th February 2024</p>	<p>I wanted to voice my opinion on this matter – from 10 min parking to per hour £4.62 this is a steep jump.</p> <p>I would like to object the whole reason why I bought electric car.</p> <p>The rise is so high that I might as well buy petrol car</p>	7E, 7D

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		Your reducing emissions by punishing electric car owners,	
338.	<p>██████████ ██████████</p> <p>Email dated 14th February 2024</p>	<p>(a) I am writing to express my deep concern and strong objection to the proposed withdrawal of benefits for electric vehicles in London, particularly the introduction of full parking charges. This move raises apprehensions that it might be perceived as a money-raising exercise rather than a thoughtful decision for the benefit of our environment.</p> <p>(b) Electric vehicles have played a crucial role in mitigating climate change and improving air quality within urban areas. The current incentives, including reduced or waived parking charges, have significantly contributed to the adoption of electric vehicles and the overall promotion of sustainable transportation choices.</p> <p>However, the potential withdrawal of these benefits, coupled with the introduction of full parking charges, sends a worrying message. It may be interpreted as prioritizing revenue generation over the continued support and encouragement of environmentally friendly transportation alternatives.</p> <p>I strongly urge you to reconsider this decision, taking into account the potential negative impact on the adoption of electric vehicles and the overall progress toward a more sustainable future. It is essential to foster an environment that encourages individuals to make eco-friendly choices, rather than imposing additional financial burdens.</p>	<p>(a) 8A</p> <p>(b) 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>Thank you for considering my concerns regarding the potential perception of this decision as a money-raising exercise. I trust that the government will prioritize the long-term environmental benefits that electric vehicles bring to our city.</p>	
339.	<p>██████████ ██████████ Email dated 14th February 2024</p>	<p>I am writing to express my strong objection to the proposed modifications to parking charges, particularly the removal of parking concessions for electric vehicles (EVs) and plug-in hybrids within the City of Westminster. This objection is grounded on the following:</p> <p>(a) Contradiction to Environmental Goals: The withdrawal of EV and plug-in hybrid concessions appears to contradict the council's stated objectives of reducing carbon emissions and improving air quality. EVs and plug-in hybrids, with their zero or minimal tailpipe emissions, are pivotal in the transition towards cleaner urban environments. Encouraging their use aligns directly with Westminster's environmental targets.</p> <p>(b) Disincentive to EV Adoption: Current concessions for EVs and plug-in hybrids significantly contribute to the attractiveness and viability of these vehicles for city residents and commuters. Removing these incentives could discourage the adoption of clean vehicles, undermining progress towards lower emissions and better air quality in Westminster.</p>	<p>(a) 7A</p> <p>(b) 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(c) Impact on Air Quality: Electric vehicles contribute significantly to improving air quality by eliminating the emission of nitrogen oxides (NOx) and particulate matter (PM), pollutants primarily responsible for urban air quality issues. The proposed policy change could slow the reduction of these harmful pollutants, impacting public health and the environment.</p> <p>(d) Alignment with National and Global Environmental Policies: The UK government, along with global entities, is pushing for increased adoption of electric vehicles to combat climate change and reduce pollution. The proposed changes by Westminster City Council may inadvertently counteract these broader policy goals and efforts, sending mixed signals to the public regarding the seriousness and commitment to environmental sustainability.</p> <p>Given these considerations, I strongly urge Westminster City Council to maintain, if not enhance, the existing parking concessions for electric vehicles and plug-in hybrids. It is essential that policies and incentives are aligned to support the transition to cleaner transportation options, thus ensuring that Westminster leads by example in urban sustainability and public health protection.</p> <p>Thank you for considering my objection. I look forward to a positive response and a reconsideration of the proposed policy changes in favor of a greener, cleaner Westminster.</p>	<p>(c) 7D</p> <p>(d) 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
340.	<p>██████████ ██████████ Email dated 14th February 2024</p>	<p>(a) I am writing to express my deep concern and strong objection to the proposed withdrawal of benefits for electric vehicles in London, particularly the introduction of full parking charges. This move raises apprehensions that it might be perceived as a money-raising exercise rather than a thoughtful decision for the benefit of our environment.</p> <p>(b) Electric vehicles have played a crucial role in mitigating climate change and improving air quality within urban areas. The current incentives, including reduced or waived parking charges, have significantly contributed to the adoption of electric vehicles and the overall promotion of sustainable transportation choices.</p> <p>However, the potential withdrawal of these benefits, coupled with the introduction of full parking charges, sends a worrying message. It may be interpreted as prioritizing revenue generation over the continued support and encouragement of environmentally friendly transportation alternatives.</p> <p>I strongly urge you to reconsider this decision, taking into account the potential negative impact on the adoption of electric vehicles and the overall progress toward a more sustainable future. It is essential to foster an environment that encourages individuals to make eco-friendly choices, rather than imposing additional financial burdens.</p> <p>Thank you for considering my concerns regarding</p>	<p>(a) 8A</p> <p>(b) 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>the potential perception of this decision as a money-raising exercise. I trust that the government will prioritize the long-term environmental benefits that electric vehicles bring to our city.</p>	
341.	<p>██████████ ██ Email dated 14th February 2024</p>	<p>(a) Whilst I am completely in favour of reducing emissions and pollution in Westminster and everywhere else, it seems to be completely counterintuitive to suggest that a parked cars should pay according to how much they pollute. A PARKED CAR DOES NOT POLLUTE.</p> <p>(b) One of the huge advantages of living in central Westminster is being able to walk everywhere, which we do. As a pensioner I also have a bus pass for the rare occasions I cannot walk. Consequently, I use our car very infrequently and only for long journeys outside of London.</p> <p>To charge a premium to park in Westminster for having a fuel efficient, low co2 diesel car , is iniquitous if the car is used so very rarely. My wife has a ██████████ – which is used even less frequently.</p> <p>(c) By all means charge on the basis of pollution, much on the same basis as ULEZ. It is a ridiculously lazy and unfair way to charge on the basis of parking, especially when the technology is in place to capture movements of cars which are actually the ones who are polluting.</p>	<p>(a) 7B</p> <p>(b) 7G, 7C</p> <p>(c) 7B</p>
342.	██████████	As a senior Westminster resident and car owner, I	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>████████████████████</p> <p>Email dated 14th February 2024</p>	<p>am writing to object in the strongest possible terms to your proposals to charge those of us who drive petrol-engine cars more money to park than those who drive electric cars.</p> <p>In the details it says: “The proposals for both the pay-to-park and residents’ permit schemes align with the Fairer Westminster Strategy.”</p> <p>(a) I'd be grateful if you could explain how it is fairer to charge those less well off more to park? As usual, you are targeting the poorer people in the borough with higher taxes, in a misguided attempt - i.e. a stick, not a carrot approach - to try and force us to either give up our extremely useful and much needed cars (especially in my case), or buy a brand new EV at a prohibitive cost. And how is forcing people to buy a brand new car fair? Furthermore, the construction of EVs is far from good for the environment, in fact lithium mining and all that goes with it is an environmental catastrophe.</p> <p>I need my car; it is well maintained and with catalytic converters, it is low on emissions, like all relatively modern cars. The situation with diesel engines is completely different and now they have largely disappeared from central London, the air quality is much better. But this is too much. What this basically is, is yet another tax on the less well off.</p> <p>(b) I would urge you to reconsider this plan, but I have no doubt you will go ahead with this</p>	<p>(a) 3A, 3B, 9A</p> <p>(b) 8A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>regardless, because it means more money for the council (which is really what it's all about), and as far as I'm concerned you're just ripping us off and it's disgraceful</p>	
343.	<p>██████████ ████████████████████ Email dated 14th February 2024</p>	<p>I object on the grounds that the removal of the concession both fails to meet the council's stated objectives (and in fact diminishes the current steps to meet those objectives) and that the reason given for the decision is flawed.</p> <p>Withdrawing the concession for electric vehicles fundamentally fails the council's objective "to discourage the use in Westminster of higher polluting private vehicles and thus positively affect the borough's air quality". The existing scheme provides a strong incentive for drivers to choose electric vehicles over petrol / diesel vehicles, the new proposed scheme dramatically reduces that incentive.</p> <p>In the council's "reasons for decision" it states that the "current pay-to-park charging structure does not fully reflect the Council's Fairer Environment aspirations". The Fairer Environment calls for London to become a net zero city by 2040 by, amongst other things, "reducing air pollution". It is hard to see how radically reducing the incentive for electric vehicles more fully reflects the Council's Fairer Environment aspirations.</p> <p>Furthermore the "reasons for decision" states the "charging structure is unsustainable with the rapid</p>	7D

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>growth of electric vehicles". Recent figures from the SMMT show that there has been a significant slowdown in the growth of electric vehicle sales in the UK. As such, the statement is incorrect.</p> <p>I would urge the council to maintain the concession for electric vehicles and consult more widely before making changes to the existing concession.</p>	
344.	<p>[REDACTED] Queen's Park Community Council</p> <p>[REDACTED]</p> <p>Email dated 14th February 2024</p>	<p>I am [REDACTED], [REDACTED] of Queen's Park Community Council, a statutory body representing the interests of Queen's Park, Westminster residents.</p> <p>In a meeting of the Place Committee on February 6th, QPCC Councillors discussed the proposed tariff and permit pricing restructure. Under delegated authority from the Full Council on such matters, the Committee voted to object to the proposals and has tasked me with submitting this official objection on the following grounds:</p> <p>(a) QPCC accept the need for action on climate change, promotes the decarbonisation of our community, and agrees that there is a need to nudge residents into adopting smaller and less polluting vehicles. The Committee, nonetheless, believes the implementation of this proposal is too hasty and does not adequately consider or mitigate the adverse and disproportionate impact on residents of Queen's Park (and North Paddington more broadly). As the City Council knows, many residents in these areas are socio-economically</p>	<p>(a) 8E, 3A, 3B</p>


APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>disadvantaged compared to all other parts of the City. While this proposal may incentivise those with the financial means to purchase more environmentally friendly vehicles, for others, it will act as a tax on the poor who cannot change their vehicles.</p> <p>(b) The Committee notes inadequate access to public transport, particularly for disabled residents who cannot access the trains and tube from Queen's Park Station, which does not have step-free access. Similarly, changes to local bus routes and bus overcrowding have also cut off or made travel by bus challenging for many. In particular, older, disabled and people travelling with buggies are often unable to access designated spaces and seats and face arduous journeys travelling across the City and further.</p> <p>(c) The proposal to implement charges for vehicles with 0 CO2 Emissions (with a small battery capacity of 1 - 69Kwh) where there was previously none breaks trust with the public, some of whom invested in such vehicles to minimise parking costs. This move will not only produce concerns regarding the underlying motivation of the new policy (environmental vs income generation). It also reduces residents' confidence that switching to more environmentally friendly vehicles will positively impact their long-term financial positions – with the unintended impact of discouraging those who feel that the cost of parking will continue to increase for 0 CO2 Emission vehicles.</p>	<p>(b) 6D</p> <p>(c) 7D, 7E, 8A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(d) The Committee also recognises that there are other, potentially more immediately impactful measures the City Council can take to reduce emissions without such adverse impacts on the most financially vulnerable residents - specifically focusing on mitigating the effects caused by big businesses and developers.</p> <p>As Queen's Park Community Council is overall in support of the ambitions to decarbonise, the Committee has proposed the following amendment:</p> <p>(e) That current permit holder be permitted to retain their permit at the existing rate (adjusted for inflation) for as long as they continue to own their current vehicles, with new rates applying to current permit holders when they attain a new or replacement vehicle.</p> <p>(f) The City Council raises awareness of the Mayor of London's scrappage scheme and introduces a supplementary scrappage scheme to make environmentally friendly vehicles more affordable.</p> <p>(g) The City Council incentivises residents to give up high-polluting vehicles by offering travel passes, car club memberships or affordable bike buying or hire schemes. In so doing, the City Council will be supporting resident's move to more environmentally friendly travel options and enabling residents to save towards environmentally friendly vehicles.</p>	<p>(d) 10B</p> <p>(e) 5H</p> <p>(f) 2E</p> <p>(g) 2E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(h) The City Council works closely with TfL to address the inaccessibility of Queen's Park Station and local concerns in regards to bus routes.</p>	<p>(h) 6D</p>
345.	<p>Save London Motorcycling</p> <p></p> <p>Email dated 14th February 2024</p>	<p>I am writing on behalf of the grassroots campaign group Save London Motorcycling to object in the strongest terms to Westminster City Council's proposals for additional vehicle surcharges specifically in relation to residents with powered two-wheelers (PTWs).</p> <p>(a) This proposal appears to have arisen from a misapprehension that rules for car parking permits can be applied to PTWs. Evidently this is mistaken as cars and PTWs are fundamentally different types of vehicle, which demand separate and distinct consideration in policy terms.</p> <p>(b) The purpose of the surcharge is clearly to free up kerbside space by discouraging residents from owning and parking multiple cars on the street. Each car a resident owns takes up some 5-6 metres of parking space. By contrast a PTW takes up only around 70-80 cm of kerbside space. A resident with 8 PTWs is therefore taking up less kerbside space than a resident with just 1 car. The assessment that PTWs take up 8 times less parking space than cars is based on our survey of real world parking in London and can be viewed</p>	<p>(a) 11C. The City Council has proposed that the cost of a residents' motorcycle permit should be £60.99. This is lower than all but the Band 1A charge for electric vehicles. More precise banding based on CO2 emissions cannot be applied to motorcycles for the reasons set out in 11C. It is therefore considered that motorcycles have been evaluated as different vehicle types in the determination of the appropriate charges.</p> <p>(b) Noted.</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>here [https://docs.google.com/spreadsheets/d/1_2UAaFGLakWDx7BtjvYiU4cRAC60yEMwX4kJGzXxmI/].</p> <p>(c) We understand that under these proposals anyone who already has a car parking permit would have to pay £111/year for their motorcycle permit, as opposed to the current £57/year. This is a substantial increase and is likely to lead to some residents being discouraged from keeping their PTW.</p> <p>Discouraging residents who have a car from also owning a PTW will lead to increased emissions and congestion in Westminster. If they decide they need their car and get rid of their PTW then some of the trips they'd previously done by PTW would then be done by car, meaning increased emissions and congestion in the Borough.</p> <p>For example a resident with a large family may need a car for some trips, but also own a PTW which they use when travelling alone or with only one passenger. Disincentivising them from keeping both vehicles may lead to them selling their PTW and keeping their car. If the Council truly wishes to tackle climate change and air quality then it is best for this resident to have the choice of both types of vehicle, so that when they need powered private transport but do not need to use their car they can choose the lower impact PTW.</p> <p>(d) We would suggest that the additional vehicle</p>	<p>(c) 11C</p> <p>(d) 71</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>surcharge be specific to the type of vehicle registered, such that for example a resident with 1 car and 1 PTW need not pay the surcharge. This will appropriately incentivise residents with a PTW to keep it and use it for journeys where they need powered private transport but do not need to use a car. The effect of this incentive will be to reduce emissions and congestion in Westminster, as per the stated aims of the policy.</p> <p>While this argument does not apply to a resident with 2 PTWs, it is clearly inequitable to charge the same surcharge for PTWs and cars. Westminster rightly distinguishes between cars and PTWs in other aspects of its charging regime, to therefore apply this policy and charge at the same level for additional vehicles is not consistent with the Council's own understanding.</p> <p>We would suggest that since the aim of the additional vehicle surcharge is to reduce kerb space taken up then if any surcharge must be levied on residents with more than one PTW then proportionately it cannot be more than 1/8th the level of the surcharge for cars, i.e. £6.25 for the first additional vehicle. Given the low level of this charge, reflecting the low impact of PTWs, the simplest and most rational solution would be for the Council to not apply the additional vehicle surcharges to PTWs.</p> <p>(e) We also note that residents PTW permits are already overpriced compared to their impact, and</p>	<p>(e) 71</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>these proposals will see them rise further. As outlined already, PTWs take up 1/8th as much parking space than cars, however these proposals will see them charged 2/3rds the rate of cars in the emission band most PTWs would fall in, i.e. £61/year for a PTW compared to £91/year for a car.</p> <p>Furthermore, the on-paper emissions of a car are likely to underestimate their impact in an urban environment, due to the effects of congestion. PTWs do not contribute to congestion and are less affected by it, so the same cannot be said of them.</p> <p><u>A study by University of Leuven</u> [https://www.tmlleuven.be/en/project/motorcyclesandcommuting] quantified this effect finding that the impact of congestion approximately doubles the marginal impact of 1 additional car in an urban environment. Since PTWs have on average less than half the on-paper CO2 emissions of cars it can therefore be said that their marginal impact in a congested urban environment is at least 4 times lower.</p> <p>Reflecting the Council's aims to reduce emissions and free up kerbside space, both of these factors should therefore be reflected in permit prices. A proportionate price for PTW permits would therefore be 8 times lower reflecting space taken up, and 2 times lower reflecting the difference in marginal emissions impact between a car and a PTW with similar on-paper emissions. We suggest therefore that the residents PTW parking permit should be reduced to 1/16th the level of the car</p>	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>residents permit, i.e. £5.70/year. We recognise that this is likely too low a price to administer, but demonstrates that increasing PTW permit prices further is counterproductive to the Council's aim that parking charges should be proportionate to impact.</p> <p>I trust that WCC will consider and accept these reasoned and proportionate amendments to the proposals for the benefit not just of PTW owners in Westminster, but for the benefit of all residents and visitors to the Borough.</p>	
346.	<p>██████████ ██████████ Email dated 14th February 2024</p>	<p>(a) It is not the fault of the local residents if the emissions is high! It would be the fault of all the traffic that is allowed into the area and along roads such a Marylebone High Road, Park Lane and all around Hyde Park Corner which remains outside of the congestion charge area. It means that there is a higher volume of all types of cars, vans and trucks within our borough and for which we, as residents, have no control over.</p> <p>Why should we be penalised for this?</p> <p>(b) I have gone to great expense to purchase an electric vehicle to play my part in assisting to combat the emissions and now you want to charge and penalise me further. I will not have it.</p> <p>(c) We are all already paying through the nose due to the economic crisis. Is it your objective to continue to totally destroy people's lives??</p>	<p>(a) 10B</p> <p>(b) 7E</p> <p>(c) 3E</p>

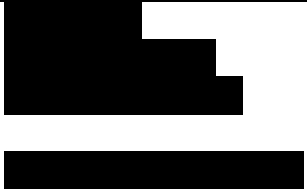
APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		DO NOT APPLY THESE CHARGES!	
347.	<p>██████████ ██████████ Email dated 14th February 2024</p>	<p>(a) You say that the aim of the parking changes is to discourage the use in Westminster of higher polluting private vehicles and thus positively affect the borough's air quality. Changing the EV charge does not discourage the use in Westminster of higher polluting vehicles and under no scenario can positively affect the borough's air quality. It in fact diminishes the current steps to meet those objectives.</p> <p>(b) You say that encouraging electric vehicle usage is unsustainable due to rapid growth of electric vehicles. I disagree that it is unsustainable as the growth in electric vehicles has slowed substantially.</p> <p>(c) In the council's "reasons for decision" it states that the 'current pay-to-park charging structure does not fully reflect the Council's Fairer Environment aspirations". The Fairer Environment calls for London to become a net zero city by 2040 by, amongst other things, "reducing air pollution". It is hard to see how radically reducing the incentive for electric vehicles more fully reflects the Council's Fair Environment aspirations.</p> <p>(d) Implementing higher parking charges for electric vehicles risks dissuading individuals from driving into town altogether. This could lead to a decline in foot traffic and patronage of local</p>	<p>(a) 7A</p> <p>(b) 7D</p> <p>(c) 7D</p> <p>(d) 12A, 12B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>businesses, particularly those reliant on commuter trade. With more people opting to work remotely, either from home or satellite offices, the vibrancy of Westminster's economy could be significantly compromised. The resulting reduction in consumer spending and business activity could have far-reaching consequences, including loss of revenue for the council from parking fees and business rates.</p> <p>(e) There remains the need for significant incentives to encourage drivers to switch to electric vehicles and hence improve air quality in central London. Whilst encouraging the use of more public transport is important, there will always be a need for private transport.</p> <p>I would urge the council to maintain the current parking charges.</p>	<p>(e) 7D</p>
348.	<p>██████████ ██████████ Email dated 14th February 2024</p>	<p>(a) I am writing to express my deep concern and strong objection to the proposed withdrawal of benefits for electric vehicles in London, particularly the introduction of full parking charges. This move raises apprehensions that it might be perceived as a money-raising exercise rather than a thoughtful decision for the benefit of our environment.</p> <p>(b) Electric vehicles have played a crucial role in mitigating climate change and improving air quality within urban areas. The current incentives, including reduced or waived parking charges, have significantly contributed to the adoption of electric</p>	<p>(a) 8A</p> <p>(b) 7D</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>vehicles and the overall promotion of sustainable transportation choices.</p> <p>However, the potential withdrawal of these benefits, coupled with the introduction of full parking charges, sends a worrying message. It may be interpreted as prioritizing revenue generation over the continued support and encouragement of environmentally friendly transportation alternatives.</p> <p>I strongly urge you to reconsider this decision, taking into account the potential negative impact on the adoption of electric vehicles and the overall progress toward a more sustainable future. It is essential to foster an environment that encourages individuals to make eco-friendly choices, rather than imposing additional financial burdens.</p> <p>Thank you for considering my concerns regarding the potential perception of this decision as a money-raising exercise. I trust that the government will prioritize the long-term environmental benefits that electric vehicles bring to our city.</p>	
349.	<p></p> <p>Email dated 14th February 2024</p>	<p>(a) I am writing to express my deep concern and strong objection to the proposed withdrawal of benefits for electric vehicles in London, particularly the introduction of full parking charges. This move raises apprehensions that it might be perceived as a money-raising exercise rather than a thoughtful decision for the benefit of our environment.</p> <p>(b) Electric vehicles have played a crucial role in</p>	<p>(a) 8A</p> <p>(b) 7D</p>


APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>mitigating climate change and improving air quality within urban areas. The current incentives, including reduced or waived parking charges, have significantly contributed to the adoption of electric vehicles and the overall promotion of sustainable transportation choices.</p> <p>However, the potential withdrawal of these benefits, coupled with the introduction of full parking charges, sends a worrying message. It may be interpreted as prioritizing revenue generation over the continued support and encouragement of environmentally friendly transportation alternatives.</p> <p>I strongly urge you to reconsider this decision, taking into account the potential negative impact on the adoption of electric vehicles and the overall progress toward a more sustainable future. It is essential to foster an environment that encourages individuals to make eco-friendly choices, rather than imposing additional financial burdens.</p> <p>Thank you for considering my concerns regarding the potential perception of this decision as a money-raising exercise. I trust that the government will prioritize the long-term environmental benefits that electric vehicles bring to our city.</p>	
350.	<p>██████████ ████████████████████ Email dated 14th February 2024</p>	<p>I hope this message finds you well. I am writing to express my deep concern and strong objection to the proposed changes.</p> <p>(a) While I understand the City of Westminster's</p>	<p>(a) 3C, 5H</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>commitment to reducing carbon emissions and improving air quality, the proposed charging structure poses a significant financial burden for residents like myself. The shift from a system where resident permits <u>were charged £0</u> to a new structure with substantial fees creates an unexpected and unwarranted financial strain. As with other policies (such as road tax), such changes could be applied to new car owners or new car models moving forward.</p> <p>My primary concern lies in the disproportionate impact on residents who own vehicles with CO2 emissions falling within Band 3, particularly those like myself who own hybrid vehicles with emissions levels between 91 and 131 g/km. The proposed permit charge of £123.05 represents a drastic increase from the current arrangement of no charges for resident permits.</p> <p>(b) When I purchased my hybrid vehicle, one of the <u>deciding factors was the exemption from road tax as well as resident permit charges</u>, as it aligned with the City of Westminster's efforts to encourage cleaner, less polluting vehicles. This sudden imposition of charges not only contradicts the initial incentive but also unfairly penalizes residents who made environmentally conscious choices based on the existing policy.</p> <p>(c) Furthermore, the assertion that the proposed changes aim to introduce a fairer and more proportionate charging structure seems</p>	<p>(b) 7E</p> <p>(c) 5E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>questionable, as the multiplier for emissions within Band 3 has not increased proportionately. This sudden and substantial increase in charges for vehicles like mine raises questions about the fairness and proportionality of the new scheme.</p> <p>(d) I urge the City of Westminster to reconsider these proposed changes and explore alternative solutions <u>that do not place an undue financial burden on residents who have made environmentally friendly choices</u>. I believe a more equitable approach can be found that aligns with the city's environmental goals without unfairly impacting residents who have actively contributed to this initiative.</p> <p>Thank you for considering my objections. I look forward to a thoughtful and fair resolution to this matter.</p>	<p>(d) 3A</p>
351.	<p>Councillor Jim Glen Pimlico North Ward Member</p> <p></p> <p>Email dated 14th February 2024</p>	<p>I have been asked by residents in my ward to respond to the TMO consultation on the proposed changes to the parking charges.</p> <p>I am less concerned about the changes to the casual on-street parking charges for visitors to the borough than the proposed changes to residents' annual parking permits. Very few Westminster residents benefit from off-street parking at home, either in a garage or on a private driveway. Thus residents who own a car largely have no choice but to park it on the street using an annual Westminster parking permit.</p>	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(a) I wholeheartedly support schemes to improve air quality for the benefit of all residents and visitors to Westminster. However the issue with air quality is not the residents own use of their cars. Almost all residents use their car very minimally, with very low annual mileage, using the abundant public transport and cycle provision for short journeys. However there are occasions when a car is vital, for example when carrying heavy loads, going on holiday or visiting out of town relatives, or carrying less able relatives. The differential charges proposed are extremely complicated and penalise those with older cars, who are often those residents who are less well off, and not able to easily change their car, especially if they are older and are on fixed incomes. Westminster residents should not be penalised relative to other Londoners or citizens of the UK more widely. Car use is already declining, with less pressure on the available space than in previous years. This should not be seen as an opportunity to raise revenue from residents under the pretence of a green agenda. There is already a nationwide scheme to encourage lower CO2 emissions through the variable vehicle tax scheme operated by the DVLA.</p> <p>(b) Please do not introduce this overly complicated and vastly more expensive scheme for residents' annual parking permits.</p>	<p>(a) 7C, 3B, 4A, 3A, 8A,7L</p> <p>(b) 4A, 3C</p>
352.	[REDACTED]	I would like to raise an objection to the proposed amendments to the charges to parking, particularly	7D, 3E

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	Email dated 14 th February 2024	<p>█████, an owner already discriminated against by way of paying a ULEZ £12.50 daily charge. Enough is enough.</p> <p>(b) My usage is limited to once or twice per month, travelling some 25 miles (say 40 minutes) to get either out of London or back home to London, 50 miles per month, or less. My usage is of 'relatively' insignificant impact upon the environment, be it emissions or traffic congestion, yet I am obliged to pay the same as a driver who can theoretically spend 24 hours driving within the ULEZ zone and possibly clock up a few hundred miles, or more. Can this be fair?</p> <p>Clearly a 'charge per mile' would have been the fair and effective method to discourage usage/reduce emissions.</p> <p>(c) Placing a further financial penalty by way of increased parking charges, on those who rarely use their cars, is yet another unfair charge and defeats the objective of reducing vehicle emissions and vehicle congestion; the manufacture of my vehicle has already created tons of CO/CO2 and to scrap it will produce MORE. That I should be encouraged to buy another manufactured vehicle will produce yet FURTHER CO/CO2 emissions, emissions that will never be amortised in light of the very limited mileage I travel. A new and heavy electric car will encourage me to use the vehicle MORE (it's new, it's cheaper to run) and so more damage to the roads, and congestion.</p>	<p>(b) 7C</p> <p>(c) 9A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(d) I strongly object to the already blatant discrimination targeted at low mileage users which could be avoided by those currently mis-managing the technology (cameras) in use by Westminster and ULEZ. Increasing RESIDENT parking charges for infrequent petrol car drivers and so blackmailing them into scrapping their vehicles to become consumers of new electric cars is both naive and counter productive.</p> <p>Pricing should be based upon consumer usage and not policy makers' abuse.</p>	(d) 7C, 7D
355.	<p>██████████ Knightsbridge Association ██████████ Email dated 14th February 2024</p>	<p>I am writing on behalf of the Knightsbridge Association (“KA”) to confirm our support in principle for the proposed changes to the Tariff and Permit Pricing Restructure (Emission-Based Charging) including its focus on diesel vehicles and higher emissions.</p> <p>However, the Council should redouble its efforts to check that only bona-fide residents are able to apply for one, two and three permits at the same address. Otherwise, we fear that the scheme could encourage a doubling (or more perhaps) of total demand for resident parking permits in some places.</p>	2E
356.	<p>██████████ The Knightsbridge Neighbourhood Forum</p>	<p>I am writing on behalf of the Knightsbridge Neighbourhood Forum (“KNF”) to confirm our support for the proposed changes to the Tariff and Permit Pricing Restructure (Emission-Based</p>	2A

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>██████████</p> <p>Email dated 14th February 2024</p>	<p>Charging) including its emphasis on diesel vehicles and higher emissions.</p>	
357.	<p>██████████</p> <p>Clear Air in London</p> <p>██████████</p> <p>Email dated 14th February 2024</p>	<p>I am writing on behalf of Clean Air in London (“CAL”) to confirm our support, in principle and as a first step, for the proposed changes to the Tariff and Permit Pricing Restructure (Emission-Based Charging) including its focus on diesel vehicles and higher emissions.</p> <p>However, CAL urges the Council to go much further and faster and signal a phasing out of all fossil-fuel emissions in resident and pay parking spaces in the City of Westminster by 2030.</p>	2E
358.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 14th February 2024</p>	<p>I strongly object to this proposal as it actively disincentivises electric vehicle usage at all, meaning the cheaper purchase of a petrol car will make more sense.</p>	7D
359.	<p>██████████</p> <p>Motorcycle Action Group</p> <p>██████████</p> <p>Email dated 14th February 2024</p> <p>(See also #2)</p>	<p>I am writing on behalf of the London branch of the Motorcycle Action Group to object to the proposal to apply the additional vehicle surcharge to motorcycles. This is irrational and counterproductive.</p> <p>(a) For the purpose of this specific policy Westminster is treating motorcycles as though they are indistinguishable from cars, this is irrational. PTWs take up significantly less space when parked, have a much smaller emissions impact</p>	(a) 11C

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>than cars, and do not cause congestion which is one of the key issues facing a central London borough such as Westminster. Therefore it is not rational to apply the same deterrent for ownership as Westminster is intending to do here.</p> <p>Westminster clearly and rightly recognises that PTWs are different from cars in its existing charging regime, it is therefore irrational to apply this policy to both vehicles at the same rate, and against Westminster's own policy.</p> <p>(b) It is counterproductive because it will force some people to choose between a PTW and a car, if only a very small number of those do choose a car over a PTW, it will increase emissions and congestion in Westminster as all of the trips that require private powered transport this individual now takes will be done by car. It would therefore be better for the aims of this policy not to apply the additional vehicle surcharge to motorcycles.</p> <p>(c) In addition, there is no justification for increasing the residents permit, when it is already too expensive based on impact. The permit is already too expensive at just a third less than a car permit, and should in fact be significantly less than a car permit based on actual space and emissions impact.</p> <p>Therefore Westminster should scrap the proposed additional vehicle surcharge for motorcycles and reduce the price of the residents permit.</p>	<p>(b) 11C, 7I</p> <p>(c) 11C, 7I</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
360.	<p>An active protesting motorist</p> <p>██████████</p> <p>Email dated 14th February 2024</p>	<p>Who I am and what I do, is unimportant, for the following reasons.</p> <p>(a) This policy is NOTHING to do with 'pollution', it is in fact, being done to push motorists into more hardship.</p> <p>(b) Thank goodness, more people are becoming aware of TfL's ulterior motives. I have NO contract with this private corporation known as TfL. I will NOT be paying ANY ULEZ fee. I will NOT be paying ANY ULEZ fine. I will NOT be paying ANY Congestion Charge fee. I will NOT be paying ANY Congestion Charge fine.</p> <p>(c) We are NOT been consulted, it appears TfL and Westminster Council intend to ride roughshod over motorists.</p> <p>Well I, for one do NOT & will NOT consent.</p> <p>The following facts are pertinent. I live in Westminster within the ULEZ Zone & the Congestion Charge Zone.</p> <p>(d) Vehicles have their exhaust emissions tested as part of the MOT. If one's vehicle FAILS the emission test ... it fails the MOT, therefore, it stands to reason if one's vehicle PASSES it's MOT it has PASSED it's 'emission test'. It appears that TfL have taken upon themselves to stand above the UK govt in having the govts decision usurped regarding</p>	<p>(a) 11A, 3E</p> <p>(b) Please note that the proposals for emissions-based charging have been put forward by Westminster City Council, not Transport for London. The proposals, therefore, have no connection to the ULEZ charge or the Congestion Charge.</p> <p>(c) 8D</p> <p>(d) 7I</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>which diesel vehicle complies and which do not. Originally it was all about the CO content, but this has now been changed to the NO content.</p> <p>In TfL's "wisdom", non-compliant diesel vehicles are being charged £12.50 to drive within the ULEZ zone.</p> <p>(e) What I fail to understand and maybe someone can help me out here - WHY are 'non-compliant' vehicles being charged a premium to park??? When a vehicle is 'parked', it is de facto NOT moving, therefore, it is NOT emitting ANY 'pollution'.</p> <p>Also, vehicles are being penalised TWICE. Once for moving and again for stopping and parking up. WHERE is the logic? What TfL are doing is NOT just a money-making scam BUT a Money-Taking scheme</p>	(e) 7B, 7L
361.	<p>██████████ ██████████ Email dated 14th February 2024</p>	<p>I oppose the price change that you have proposed. I bought my car in good faith and spent a lot more than I would have on the understanding that I would have a discount on fees that London charges for parking and driving in the Borough of Westminster, whilst doing my part for the environment. If you change the policy before the date which was previously proposed then you make the Council untrustworthy and I for one will never believe a word that you say. I will also never vote for a Labour government as you have proved that you are no better than the Tories.</p>	7E

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
362.	<p>████████████████████ ████████████████████</p> <p>Email dated 14th February 2024</p>	<p>I write to strongly object to the proposals (the changes to charges for Resident Permits).</p> <p>(a) You claim that the policy is “fairer”, and that vehicles are being charged in accordance with the level of emissions they produce. Yet your policy does not take in account how much the vehicle is being used. Therefore somebody driving a Band 2 vehicle daily will pay less a year for a resident permit than someone who owns a Band 4 vehicle and drives it once a week, even though he would produce more emissions over the course of the year. Therefore in many cases, the policy would be manifestly unfair.</p> <p>(b) You also assert that the City Of Westminster “has some of highest carbon emissions and worst air quality of any local authority”. Even if your assertion is assumed to be true (for which you don't provide evidence and would be disputable), there is absolutely no evidence that this is caused by the vehicles of Westminster residents! You know full well that Westminster is in the capital city of the country with many businesses and therefore many road users coming from outside or passing through. The Mayor of London's Nov 2017 supporting document for the expansion of the ULEZ zone for the Inner London area (p.36) projects that road transport would account for only 31% of total NOX emissions with a significant proportion of those coming from TfL's own buses (of which many are concentrated in the City of Westminster) and which</p>	<p>(a) 7C</p> <p>(b) 11A, 11B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>far exceed the total emissions from petrol cars. It follows that the proportion of harmful emissions caused by the vehicles of Westminster Resident Permit holders (especially holders of permits for petrol cars) must be negligible and cannot be a justification for the proposed changes.</p> <p>(c) You also claim that the changes are intended to “incentivise [use of/purchase of(??)] cleaner, less polluting vehicles”. It will not have that effect, and I am sure you know this, because the money saved in having a permit of a lower band is not even comparable to the cost incurred by selling a petrol/diesel vehicle and buying an electric one. There is no incentive - it would only be an incentive if the cost of the higher bands permits were £1000s, rather than £100s (but I probably shouldn't be giving you any ideas). For example, my existing permit will now fall in Band 5, but that is not going to make me change my vehicle, or change my driving patterns. I own an old petrol car which I already drive less owing to the ULEZ, but I am not in a financial position to change it (and if I indeed owned a ULEZ compliant car I would drive a considerable amount more) and I do rely on the vehicle. All you are doing is raising the permit by 36% (£56) - far exceeding the rate of inflation at a time when incomes are squeezed. That is certainly not “fair”.</p> <p>(d) Lastly (this point is not an objection as such) you willfully confuse improving air quality and reducing of CO2 emissions. As you know,</p>	<p>(c) 7D, 3C</p> <p>(d) 11A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>incentivising diesel vehicle usage over petrol vehicle usage may be better for the climate but would be worse for air quality. Why are you putting the two together?</p> <p>(e) Of course you have already decided the changes and the consultation is a mere formality which you are going to ignore even if an overwhelmingly majority of respondents object to your proposals, but I would nonetheless like an acknowledge of this email and a response to each of my points.</p>	(e) 8G
363.	<p>██████████ ██ Email dated 14th February 2024</p>	<p>I have an EV which I have leased on subscription for nearly █ years, which I park in Westminster on a daily basis. If the new parking charges are brought in, my daily parking cost will rise more than tenfold, making it financially non-viable to use the EV and, consequently, financially non-viable to continue to lease it. I have to have a car in London for family reasons, so if the proposals are passed I will have to return the EV and instead buy a petrol car, which will be much cheaper to acquire and cost the same as an EV to run. The new charging policy will be forcing me to change from an EV to a petrol vehicle on grounds of affordability of the vehicle itself.</p> <p>I urge the council not to make these changes which will inevitably lead to fewer EVs in use in Westminster and thus to greater pollution as people switch back to petrol vehicles.</p>	7D
364.	██████████	I'm writing to communicate my views on your	7D

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>████████████████████</p> <p>Email dated 14th February 2024</p>	<p>proposed, new parking charges for Westminster.</p> <p>As a regular commuter to Westminster, I was about to purchase an EV car subscription as I'm keen to help reduce emissions and make London more environmentally friendly.</p> <p>However, your proposed changes to the parking fees would prevent me doing that.</p> <p>I'm appalled at the hypocrisy - on the one hand you say you want to encourage reduced CO2 emissions and, on the other, you remove the financial benefits (ie cheap parking) to switch to EV and so fail to support significant reductions.</p> <p>Should your proposed, increased charges come into effect, I'll be purchasing a petrol car instead - I want it to be really clear the direct impact your proposed changes are likely to have.</p>	
365.	<p>██████████</p> <p>████████████████████</p> <p>Email dated 15th February 2024</p>	<p>I am strongly opposed to the changes to EV parking in Westminster. The concession rate that is being abandoned was a material inducement to invest a far greater amount into an EV purchase to assist with environmental concerns.</p> <p>Eroding this benefit appears to go against the stated policy of Westminster to cut pollution and encourage EV adoption.</p>	7D
366.	<p>████████████████████</p>	<p>I am writing to strongly object the current consultation paper which aims to withdraw the</p>	

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>████████████████████</p> <p>Email dated 15th February 2024</p>	<p>concession for electric vehicles allowing vehicles to park up to the bay's maximum stay for a minimum 10-minute payment.</p> <p>(a) This new measure is disproportionately and negatively impacting drivers who have made the choice to drive clean and sustainable vehicles to support and align with the country and government long term ESG and sustainability goals. Although this initiative is inevitable, it comes way too early and with virtually no notice and poor communication around it. EV drivers should at least be granted a few years to adapt to this new norm as many of us would have contracted long lease agreements with car manufacturers precisely for daily commute purposes. The minute this new rule is enforced, it will virtually make it economically impossible for us to park in town on a work day, strongly impacting our professional lives.</p> <p>(b) Further, I can't even begin to imagine the negative impact on the entire EV-driven community of businesses and tech companies that are currently operating in London and flourishing on the back of this amazing subsidy initiatives. This includes, EV-charging point developers, small and medium businesses who have invested millions of pounds into shifting to electric fleets for their workers (and will see their operating costs bounce overnight) but will also completely annihilate innovation in the EV-sector in Central London (companies like On.to for example). Currently this measure is something that Westminster EV</p>	<p>(a) 7E, 8E, 5F, 12B</p> <p>(b) 12A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>commuters are very proud of and a clear differentiator for the council, why turn this into one of the most unpopular measure of all time?</p> <p>(c) Finally, the change proposed itself seems too drastic and disproportionate. Why not look to compromise by starting to change prices on the weekend or a limited amount of days to create a transition period for current subsidy-dependent people commuting to Westminster every day? Why not look into specific cases of people fully reliant and dependent on it? Why not filter by models first? Many of us who drive to London often have no other choice but driving to town as living too far from tube stations or having commute restrictions for personal reasons. This will create a huge impact on our lives, both personal and professional.</p> <p>(d) This is one of the most important decisions that the council may have to do in recent times with significant impact in flows of people and businesses which clearly seems to be totally underestimated. This change should not be taken lightly and would deserve to be more broadly advertised over a longer period of time and discussed with the broader Westminster EV driven community. This change is at risk of becoming one of the most unpopular measures ever taken at the council level since the Park Lane bike lanes!</p> <p>Many thanks for your consideration.</p>	<p>(c) 7I, 3B</p> <p>(d) 8E</p>
367.		I appreciate this consultation closed on 14 Feb. but	7L

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 16th February 2024</p>	<p>I have been out of the country and as a Resident Parking Permit holder of long at [REDACTED] London, [REDACTED] I would be grateful if you would consider my input.</p> <p>I vote NO to this increase and change of charges. As a driver of a vehicle subject to ULEZ and Congestion Charges I already pay quite enough whenever I am obliged to use my car. For most journeys I walk or use the bus or tube. The car is only used for long distance trips.</p> <p>I think it both unfair and unacceptable that I should pay more to simply park my car when you are already imposing user charges for my vehicle which I pay.</p> <p>Please do not impose this further stealth tax!</p>	
368.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 16th February 2024</p>	<p>With reference to the proposal in subject and conscious that the deadline is passed, I am writing to understand the rationale between rising the price of the parking permit or the parking in general and the increase in carbon emission hoping that my suggestions will be taken into consideration.</p> <p>(a) The introduction of additional parking fees surely will not decrease the level of CO2 in Westminster. People will not be incentivised to - for instance - change their car or reduce using their car. It will only make people generally angrier with the Council.</p>	(a) 7D, 7I

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>Whilst I appreciate that the incentive towards greener vehicles could not last indefinitely, I would have thought that keeping at least the parking permit free for EV could have encouraged the more sceptical ones to make a switch.</p> <p>(b) I am generally in favour of putting restrictions for vehicles that are obsolete and that can definitely contribute to the increase of CO2, but increasing the prices of all parkings across the board seems to me yet another way for the Council to tax their residents and raise money.</p> <p>(c) Therefore I am not in favour of raising the parking prices and I would welcome more ideas / measurements to tackle the already compromised air quality of Westminster. Such as implementing more areas that are pedestrian only and free of cars, speeding up the transition of buses to low emission or O emission vehicles, increasing the incentives to people that actually want to switch to EVs (and not decreasing them).</p>	<p>(b) 8A</p> <p>(c) 10B, 7D</p>
369.	<p>██████████ ████████████████████ Email dated 18th February 2024</p>	<p>I object in the strongest possible terms to you increasing parking charges in pay and display sites.</p> <p>Electric Vehicles have zero emissions and comply with Government guidelines to keep cities and environments safer.</p>	7A
370.	<p>██████████ ████████████████████</p>	<p>(a) I hope this letter finds you well. I am writing to express my concerns and objections regarding the new proposed charging structure for resident</p>	(a) 7A, 7D

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
	<p>Email dated 18th February 2024</p>	<p>permits within the Westminster area, specifically the aspect that denies free permits to electric vehicles (EVs). I believe that this decision not only unfairly penalizes those who have invested in environmentally friendly vehicles but also sends a misguided message about the Council's commitment to promoting sustainable transportation.</p> <p>(b) First and foremost, the proposal contradicts the commendable efforts made by residents who have chosen to invest in non-polluting electric vehicles. These individuals have made a conscious decision to contribute to the reduction of air pollution, noise, and overall environmental impact. Denying them a resident permit without charge not only undermines their efforts but also fails to acknowledge and encourage virtuous behavior that aligns with the ecological and public health policies you/we aim to promote.</p> <p>(c) Moreover, this charging structure, as currently proposed, creates a system where everyone is taxed for driving around Westminster, irrespective of their commitment to environmentally friendly practices. I urge the Council to reconsider this approach and redistribute the credit generated from taxing Band 1A and Band 1B vehicles to all owners of fossil fuel vehicles. This adjustment would not only maintain or potentially increase the financial capital generated by the tax, but also promote a fairer system that aligns with the ethical principles of ecological and public health policies.</p>	<p>(b) 7E</p> <p>(c) 5E</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>(d) In order to foster a truly sustainable and eco-conscious community, the Council's policies should explicitly support virtuous behaviors. Taxing electric vehicles at this juncture seems premature, considering the significant positive impact they have on the environment. Instead, let us redirect our focus towards encouraging the adoption of non-polluting vehicles and rewarding those who have already taken steps towards a cleaner, greener future.</p> <p>I trust that the Westminster Council is committed to creating policies that promote environmental sustainability and public health. I kindly request a reconsideration of the proposed charging structure for resident permits, with a specific emphasis on exempting electric vehicles from charges. This adjustment would not only align with ethical and ecological principles but also demonstrate the Council's genuine commitment to fostering positive change.</p> <p>Thank you for your attention to this matter. I look forward to a favorable response that reflects a commitment to fairness, sustainability, and the well-being of our community.</p>	(d) 7D
371.	<p>██████████ ██████████ Email dated 19th February 2024</p>	<p>I'm writing to object at the proposed new pricing structure for residents' parking permits in Westminster.</p> <p>(a) The emissions of a vehicle in no way affect</p>	(a) 8B

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>the cost of providing and enforcing parking in the borough.</p> <p>(b) I can understand wanting to discourage highly emitting vehicles from driving into the borough, via parking charges, but there is no reason to punish residents via increased charges to park their cars.</p> <p>In some cases, the cost of a permit will double, which is grossly unfair.</p> <p>Your justification that other councils are doing this, is not a good enough reason to charge your residents more.</p>	<p>(b) 3C</p>
372.	<p>██████████ ████████████████████ Email dated 20th February 2024</p>	<p>(a) I realise I am late in responding - however I do consider that an unreasonably short time period was given for this.</p> <p>Please pass this comment below to Westminster City Council:</p> <p>(b) I am stunned by the proposal to allow three car permits per resident. This is surely contrary to all Westminster's aims as regards car usage. The proliferation of parked vehicles in certain streets could be pretty substantial. The one permit per person rule has been extremely effective in limited the number of resident vehicles. Indeed there are development schemes where residents forfeit their rights to a permit at all.</p> <p>I strongly urge the council to rethink this aspect.</p>	<p>(a) 8E</p> <p>(b) 5A</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
373.	<p>██████████ ██████████</p> <p>Email dated 20th February 2024</p>	<p>I agree that emissions are a problem in Central London and that it is necessary to operate some sort of control.</p> <p>While the new charges are an incentive to reconsider the type of vehicle used, I feel that more important is the usage of the more polluting vehicles. The amount of usage seems to be relevant as static vehicles are not causing the problems. So maybe limited usage is something to be encouraged rather than just the car occupying a parking space.</p>	7C
374.	<p>██████████ ██████████</p> <p>Email dated 9th February 2024</p>	<p>(a) On what basis of evidence have you dramatically increased parking charges?</p> <p>(b) Or just a fund raising exercise?</p> <p>An absolute disgrace.</p> <p>(c) I'm in my ██████s and need a car.</p>	<p>(a) 11A</p> <p>(b) 8A</p> <p>(c) 3B</p>
374.	<p>Email dated 27th February 2024</p>	<p>(d) Why were diesel cars encouraged by the government of the day?</p> <p>Clearly that was a ridiculous policy error.</p> <p>(e) As for the rest of it I and others would much appreciate a note of the cost of the analysis and administration that you describe.</p> <p>(f) Half unused cycle lanes plus narrowing of</p>	<p>(d) The policy to promote the use of diesel vehicles was introduced by the national government and, as such, is outside the scope of the proposals in question.</p> <p>(e) 10G</p> <p>(f) 10B</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
		<p>roads to single lane traffic jams causes much of the pollution to which you refer.</p> <p>Come along to [REDACTED] one day to observe the consequence of such policies.</p> <p>Closure of Hyde Park south carriageway another example of a cause of congestion and pollution.</p> <p>Anyone trying to drive around London these days can see what you have done - hold ups part used cycle lanes (the rest on pavements) uncoordinated roadworks general congestion and pollution from restricted road space.</p> <p>Maybe we should turn off our heating in homes and offices to assist your policies?</p>	
375.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Email dated 15th February 2024</p>	<p>(a) Thank you for your helpful explanation. If a small sub group can be inserted into pay band 3 due to numbers it seems a shame that the same cannot be done in pay band 4 which has virtually one-third (31.7%) of all vehicles and spans over 100 g/km. This proportion is no hugely less than the 41% in the previous pay band 3.</p> <p>(b) It seems unfair to those of us at the bottom end of pay band 4 who drive ordinary cars rather than large SUVs/chelsea tractors/four by fours but are penalised as though we do. My car is narrower, lower and much smaller and is only emitting 156 g/km. I can actually park in a current parking space unlike many of them!</p>	<p>(a) 5E</p> <p>(b) 7I</p>

APPENDIX B – RESPONSES TO CONSULTATION (CONTINUED)

	NAME AND ADDRESS	RESPONSE	OFFICERS' COMMENTS
376.	<p>██████████ ██ Email dated 27th February 2024</p>	<p>I purchased my electric car and committed to a lease on my office, on the basis of affordable parking charges and to ensure environmental progress.</p> <p>(a) I understand the need to increase the charges due to the proliferation of electric vehicles and lost revenues for Westminster, however, there is very little difference in charges now for electric vehicles and regular cars which seems grossly unfair and not environmentally friendly.</p> <p>This further undermines the council's legal and moral obligations to promote a reduction in air pollution and CO2 emissions.</p> <p>(b) Furthermore, the jump in charges for parking an electric car is so dramatic, from what was previously very affordable is now unaffordable and therefore unfair. Previously I would have paid £0.93 for 4 hours of parking. It is now going to cost around £20, £100 per week, over £400 per month making the purchase of my electric car at a premium price uneconomic. The jump in charges for electric cars are egregious and disproportionate.</p> <p>(c) At the very least I would hope that the new charges could be staggered over time, to give car owners time to adjust to this and help with economic travel planning and local businesses should have some form of exemption.</p>	<p>(a) 7D</p> <p>(b) 3D</p> <p>(c) 12E</p>