



The Association of British Drivers

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Climate Change and Parking Permit Charges Consultation
Environment Directorate
London Borough of Richmond
Civic Centre, 44 York Street
Twickenham
TW1 3BZ

7 November 2006

Submission to the Climate Change and Parking Permit Charges Consultation

Dear Sirs,

On behalf of our members, I wish to submit the following comments on the proposed changes to the Permit Parking regime in Richmond (more information on our organization is given at the end of this letter):

1. We suggest that Richmond Council has missed the point. Most energy is used when a car is manufactured and when it is scrapped, not when it is driven or parked. If Richmond's proposal is implemented, people are more likely to get rid of larger, older cars with many years life left – causing more pollution than if the cars had simply been driven.
2. In any case, targeting car users will not make any significant impact on CO2 emissions. One of the most interesting recent statements from Transport for London in their submissions on the Thames Gateway Bridge inquiry was the following statement: *"Private cars constitute only 10% of total UK CO2 emissions, and the position appears to be both under control and improving, largely due to technology"*. If you assume only 10% of cars are "gas guzzlers" and their owners all moved to smaller cars (with about half the CO2 emissions), then the net impact will be 0.5% of CO2 emitted in Richmond. But of course most of them will not, and many cars are parked off the street so the net impact will clearly be imperceptible.

These charges are obviously not about improving emissions, but simply about raising more money for hard pressed council budgets from local residents.

3. The council appears not to have studied what the actual impact on CO2 emissions will be in Richmond before commencing this consultation. How can residents of Richmond make an informed decision on the matter if no information is provided on the likely reduction in CO2 emissions, and the likely extra revenue that the council will raise from this measure?

4. Councillor Serge Lourie (Leader) has been quoted in the press as saying "*We believe there would be a 15% cut in emissions if everybody bought a car one band lower than they have at present*". Is that a prediction of what might happen or a hope? Even if that was the outcome after a number of years, then one also has to estimate how many of the cars that are parked in Richmond are actually parked in permit parking bays – Richmond Councillor David Marlow has suggested that only about one sixth of residents would be impacted by the tax. Therefore the net impact on CO2 emissions might be 0.25% (ie. 15% of 10% divided by 6). And that's the result after some years as people cannot and will not instantly change their vehicles. In reality, that change over the number of years will be imperceptible and will be swamped by other factors.

Of course if everyone "bought a lower band car", this would result in either the older cars being scrapped which would generate even more pollution as pointed out above, or would result in someone else buying the car and hence contributing to a further increase in the total number of vehicles on our roads.

5. Councillor Lourie has also said that the prime motive for this proposal is the threat of climate change – to quote "*Climate change is the single greatest challenge facing the world today*" and "*the truth is that we must all start acting now at local level*". Or to quote from the council's web site page that announced these proposals: "*By implementing a scheme to reduce CO2 emissions locally, Richmond upon Thames can make a positive impact on climate change nationally and globally*". As I have pointed out above, there will be negligible impact locally, and therefore clearly no significant impact nationally or globally so this statement is grossly misleading. But these comments tend to assume that CO2 emissions are linked to climate change or are likely to cause it.

There is great doubt among reputable scientists as to whether climate change is happening, whether such changes are natural and cyclical, and what the causes are. It is beyond the scope of this note to explore these issues fully, but more information on this subject is present on our web site at: www.abd.org.uk/env.htm . But what we can say is that Richmond councillors seem to be imposing very large charges on local residents simply on some rather flimsy and uncertain evidence that cutting CO2 emissions may have a positive benefit. In reality the likely reduction in CO2 emissions to be obtained are not certain to have a positive impact on anything.

It would appear to us that the proposed increases in permit parking fees are therefore more about raising revenue, using the prejudice for "green" measures as an excuse, rather than a serious attempt to tackle air pollution issues.

6. We would also question whether the proposal is legal. Permit parking schemes are permitted by law under the Road Traffic Acts and those Acts relate to the regulation of traffic and parking. These are not Acts that mention any duty to control CO2 emissions, or give powers to councils to implement environmental measures so any attempt to invoke such charges using those Acts would be "ultra vires". In addition it would seem to me that the council is implementing such charges primarily as a means to raise revenue and there was a legal case back in 1995 (Camden v Cran) where the judgement suggested that this was illegal. Under what regulations does Richmond Council claim to have powers to impose charges on residents whose main purpose is to control the CO2 emissions of vehicles (and that is clearly the main purpose as stated by Councillors Lourie and Trigg)? And has there been any legislation subsequent to the aforementioned case that enables the council to impose parking charges that are clearly in excess of that needed to regulate and administer parking provision?

7. We are also concerned that the proposed charges may weigh heavily on people who need a larger vehicle because of particular circumstances. For example, because they have a larger family. The charges also impose penalties on stationary vehicles when actual CO2 emissions from those vehicles are directly related to their usage – and taxes on petrol ensure that users of high fuel consumption vehicles already pay more and have a strong incentive to reduce their consumption. If it is considered necessary to reduce fuel consumption generally, then there are much more effective measures that could be used other than introducing variable permit parking rates.

In summary we are opposed to the proposals to vary permit parking charges based on CO2 emissions. Permit parking charges in Richmond are already excessive and may even now be illegal. The encouragement of vehicles that produce lower pollution may be meritorious (particularly if concentrated on other pollutants rather than CO2), but this is best done via national policies – for example by the vehicle licensing taxes as has already been implemented. But such policies need to be reasonable and be brought in over time, so that people can adapt to changing taxation levels.

The proposals from Richmond are unfair, unreasonable and probably illegal.

Yours sincerely

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About The Association of British Drivers (ABD)

The ABD is the leading independent organisation which represents the interests of private motorists in the United Kingdom. We campaign to protect the rights of individual road users and believe that road transport is a beneficial and essential element in the UK transport infrastructure. We oppose excessive taxation of motorists and are against tolls and road usage charging. We also campaign for more enlightened road safety policies. The Association is a “not for profit” voluntary organisation which is financially supported primarily by its individual members. More information on the ABD is available from our web site at www.abd.org.uk