

Delegated Authority for approval of Parking Policy and Procedures and Statutory Consultation about Emissions-based Parking Permit Charges July 2020

1. Background

Parking policies and procedures have the ability to influence the number, type and the amount of usage of vehicles in an area and can be an important tool in delivering behavioural change and improvements to air quality (and consequently environmental and public health improvement). Local authorities have powers to control and regulate parking.

In terms of the wider policy framework all London Councils must operate in accordance with:

- the statutory duties with respect to air quality set out in Part IV of the Environment Act 1995;
- the requirements of the London Local Air Quality Management statutory process set by the GLA (Greater London Authority);
- The (London) Mayor's Transport Strategy 2018;
- The (London) Mayor's (draft) New London Plan;
- The national 'Road to Zero' Strategy which aims for 50%-70% of new car sales to be ultra-low emissions vehicles by 2030;
- The Clean Air Strategy 2019;
- The Newham Air Quality Action Plan.

Newham residents are exposed to high levels of toxic pollution caused by vehicles causing the highest rate of deaths in England - that's 96 people dying prematurely each year. Newham also has the highest number of children admitted to hospital due to asthma-related conditions.

The Air Quality Action Plan has been produced as part of our legal duty to London's Local Air Quality Management strategy. It outlines the actions we will take to improve air quality in Newham up to 2024.

Particulate Matter are particles that can be ingested deep into the lungs. Most particulate matter emissions in London are caused by road traffic. The whole of Newham is significantly exceeding the World Health Organisation's air quality guideline objective. This pollutant has significantly adverse health impacts, particularly for the most vulnerable in our society. As well as contributing to the achievement of our air quality duty, the revised parking policies and scale of charges must also meet the London Mayor's Transport Policy outcomes as well as our local policy and wider corporate aspirations.

A Cabinet Report approved in February 2020 authorised public consultation about changes to the Council's Parking Policy and Procedures document to respond to the air quality challenge in the Borough, as motor traffic is a significant contributor to our poor air quality. There is also an immediate need to restrain any growth in car trips as a result of reductions in public transport capacity as we gradually emerge from the Covid-19 lockdown.

The Council's existing Parking Policy and Procedures were implemented at a time when emissions-based permit charging was in its infancy. Subsequently many London boroughs have introduced some form of emission-based permit charging and are finding the policy to be an effective tool in reducing vehicle emissions by influencing behavioural change and to help improve air quality. The proposed Newham Parking Policy and Procedures document includes the introduction of emission-based parking charges similar to those already operating in many London boroughs.

As part of the process for revising the Newham parking policies and procedures and to make parking 'fairer' to everyone in the borough in line with mayoral commitments, a new set of policies were developed. Two distinct public engagement phases have been completed; the first in the spring of 2019 and the second in March 2020. The initial phase comprised a series of Citizen's Assembly type events themed around transport and parking and a parallel online engagement tool called POL.iS. Participants were chosen to be broadly reflective of residents' demographics in the borough and the events were designed to capture the views of residents with access to a car and those who relied on other forms of transport. This initial phase helped develop the broad outcomes to be achieved by the review of parking policies and procedures. The headline results showed that:

- 67% of participants were unaware that children could become ill from breathing in car fumes;
- 65% supported the need to bring down Nitrogen Dioxide (NO₂) pollution emissions generally;
- 45% believed Newham would be a nicer place with less cars;
- 50% said fear of traffic and accidents prevented them from considering cycling on the road network;
- 62% wanted measures specifically introduced to significantly reduce car emissions in Newham.

The full results of the initial consultation phase were reported to Cabinet in May 2019 and resulted in the development of a series of revised parking policies which aim to:

- make parking 'fairer' to everyone in the borough;
- promote lower car ownership in the borough and incentivise cleaner vehicles by shaping the composition of our vehicle fleet in the borough by means of differential parking permit charges (for both residents and businesses) based on the vehicle's emissions;
- make provision for 160 new residential electric vehicle charging points during 2020/21;
- improve sustainable and active travel by reducing the amount of car travel undertaken in the borough by means of an uplift to existing parking charges, both on- and off-street, in order to make trips by other modes more attractive in comparison.

The Cabinet approval in February 2020 agreed to the draft revised parking policies for the second phase of informal public consultation which was carried out in March 2020. A total of 4,832 responses to the online questionnaire were received by the council of which 4,281 raised concerns (mostly relating to costs) regarding the introduction of emission-based permit parking charges to help improve air quality in Newham. However it should be noted that this only represents approximately 1.5% of the Newham population, and less than 8% of the vehicles registered within the borough meaning that the vast majority of residents did not raise any concerns or objections.

Historically, few motorists ever support the introduction of, or an increase in, parking charges irrespective of the wider health benefits associated with the proposal. The lack of support is therefore more likely to be a reaction to the potential of paying more for a permit regardless of the fact the vehicle may be higher polluting and is not considered to be a rejection of the policy for introducing an emissions-based charging system.

These results should be considered in conjunction with the 2019 initial phase consultation results which showed two-thirds of residents wanting measures adopted to improve air quality and reduce car use.

The results of the March 2020 consultation are set out at **Appendix A**. Following feedback some minor amendments have been made to the draft Parking Policy and Procedures document which have no bearing on policy content. The revised draft is attached at **Appendix B**. **Appendix C** details the changes which have been made.

The poor air quality in Newham cannot be ignored and measures need to be adopted to address this problem for the benefit of all residents and particularly the young and elderly and those with underlying respiratory issues. Cars are a major contributor to the poor air quality in the Borough and it is necessary and appropriate that measures are adopted that use financial incentives to encourage a modal shift to less polluting means of transport. For these reasons it is considered appropriate to proceed to a formal statutory consultation on the introduction of emission-based charges in addition to the current policy of applying a surcharge for second and third (or more) permits at the same household. The consultation will commence in July 2020 for a period of three weeks; it is intended to take these results back to Cabinet in September or October 2020 for a decision on implementation.

An analysis and evaluation of the positive and negative impacts from the new charges concludes that the reasons for introducing emission-based parking charges outweigh the reasons for not implementing them.

This report seeks Delegated Approval to note the responses to phase two informal consultation, to approve the changes to the Council's Parking Policy and Procedures document, and proceed with the statutory consultation about introducing emission-based parking permit charges and other permit changes. The proposed changes to the Parking Policy and Procedures document are detailed in **Appendix C**.

2. Recommendations

The Corporate Director of Environment and Sustainable Transport in consultation with the Cabinet Member for Environment, Highways and Sustainable Transport, is recommended to:

- i. note the results of the March 2020 consultation about the draft Parking Policy and Procedures document attached at **Appendix A**;
- ii. approve the Parking Policy and Procedures document (as attached at **Appendix B**), subject to the outcome of the statutory consultation on emission-based permits and any necessary approvals;
- iii. approve the changes made to the draft Parking Policy and Procedures document as detailed in **Appendix C**;
- iv. approve the proposed emission-based permit charges and other permit changes as detailed in **Appendix D**;
- v. approve the commencement in July 2020 of statutory consultation about the implementation of emission-based parking permit charges and other permit changes in accordance with the requirements of the traffic order procedure regulations and in accordance with the forward programme; and
- vi. approve the Statement of Reasons for proposing to make the traffic order/s attached at **Appendix E**.

3. Details of proposals

The Council's existing Parking Policy and Procedures were implemented at a time when emission-based permit charging was in its infancy. Subsequently many London boroughs have introduced some form of emission-based permit charging and are finding the policy to be an effective tool in reducing vehicle emissions by influencing behavioural change and to help improve air quality. The proposed Newham Parking Policy and Procedures document includes the introduction of emissions-based parking charges similar to those already operating in many London boroughs.

As part of the process for revising the Newham Parking Policy and Procedures, and to make parking 'fairer' to everyone in the borough in line with mayoral commitments, a new set of policies were developed. Two distinct public engagement phases have been completed; the first in spring 2019 and the second in March 2020. The initial phase comprised a series of Citizen's Assembly type events themed around transport and parking and a parallel online engagement tool called POL.iS. Participants were chosen to be broadly reflective of residents' demographics in the borough and the events were designed to capture the views of residents with access to a car and those who relied on other forms of transport. This initial phase helped develop the broad outcomes to be achieved by the review of parking policies and procedures.

In addition to the external policy framework as detailed above the Parking Policy and Procedures document contributes to the achievement of Corporate Priorities 2 (Building Communities), 4 (An Environment for All) and 5 (Quality of Life). Efficient and cost-effective execution of the parking strategy and scale of charges review in conjunction with the consequent improvement in customer focus and responsiveness also contribute to Priority 6 (An Efficient and Effective Council).

As a result of the extensive engagement to determine the desired outcomes of the new policies and procedures document and the further consultation phase proposed, it also satisfies the corporate principles of People at the Heart of Everything We Do, Openness and Transparency and Efficient Delivery and Value for Money.

The parking policies and charges review is a key component of 'Climate Now' and contains a number of key initiatives to improve air quality and to increase levels of active and sustainable travel undertaken in the borough. It aligns fully with both the borough's Local Implementation Plan and also the Air Quality Action Plan, of which this strategy is a key component of both. It will also complement the emerging Public Health strategy for the borough.

As part of this proposal approval is now being sought to agree the emission-based parking permit charges and other permit changes and implement the changes to the Council's Parking Policy and Procedures document, note the responses to the phase two informal consultation, and proceed with the statutory consultation for introducing changes to certain permits and emission-based parking permit charges and other permit changes (e.g. the 10 hour resident visitor permit would now be valid for 12 hours and the introduction of discounted business permits for charities who need their vehicles for local charity work). The proposed changes to the Parking Policy and Procedures document are detailed in **Appendix C**.

4. Consultation to date

- First phase consultation completed in March 2019 (Assembly events and on-line engagement via POL.iS platform);
- Cabinet Member engagement was undertaken prior to Cabinet approval in February 2019;
- Second stage consultation completed in March 2020 (on-line questionnaire);
- The Cabinet Member for Environment, Highways and Sustainable Transport has been fully engaged throughout the entire parking policies and procedures review process.

Full details of the consultation undertaken and the responses obtained are included in **Appendix A**.

5. Forward Programme

The proposed programme for the scheme is set out as follows:

- Statutory Consultation (July 2020)
- Report on Statutory Consultation (August 2020)
- Report to Cabinet (September/October 2020)

6. Financial Implications

The proposed parking strategy seeks to align parking policies and charges with Mayoral commitments and support the Council's objectives of air quality, environmental improvement and behavioural change. A key element of the proposed revised strategy is the introduction of emissions-based permit charges.

The proposal to introduce emissions-based permit charges for resident and business permits is set out in **Appendix D**. The proposals could generate an additional £4.5m in a full year on current levels, based on charges according to emissions tiers, with residents' vehicles with emissions of 50g/km or less incurring no charge for a permit (75g/km or less for business permits). The estimated income is based on vehicle type data from DVLA and permit data. The objective however is to influence a change in the vehicle fleet to less polluting vehicles and it is expected that income will reduce steadily through years two and three and furthermore as vehicles are traded in for lower emission vehicles. In addition, there will be an effective loss

of parking revenue as a result of the Mayor's pledge of limited free parking in town centres for residents' and the implementation of new policies and procedures.

While these additional costs and likely revenue losses cannot be calculated precisely at this time, these have been estimated to total c. £1.4m, leaving a potential surplus of £3.6m. This could result in additional funding being available to address stakeholder aspirations such as local highway and environmental improvements, improved highways maintenance, improved public realm and soft landscaping and higher quality walking and cycling networks.

7. Legal Implications

The Traffic Management Act 2004 and the Statutory Guidance that accompanies it requires local authorities to regularly review their policies and procedures to ensure they remain fit for purpose. The Environment Act 1995 and other national, London-based and local policies require the council to improve air quality for all its residents. The new parking policies and procedures include measures designed to affect vehicle use and encourage a shift to less polluting forms of transport.

The council has the power to introduce such measures under the Road Traffic Regulation Act 1984 and the procedure for doing so is set out in the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996.

The traffic order/s required to revise parking permits and charges will be processed under sections 45, 46, 49 and 124 of the Road Traffic Regulation Act 1984.

8. EQIA




The Council has a public sector equalities duty under section 149 of the Equality Act 2010 which requires the Council to have due regard to:

- 1) the need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Equality Act 2010;
- 2) the need to advance equally the opportunities between person who share a relevant protected characteristic which are gender, race, and disability, sexual orientation, age, religion or belief, marriage, pregnancy and maternity and gender reassignment.

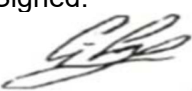
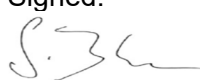
This section considers how relevant the policy is to equality and which group(s) it is likely to affect most. It assesses the protected characteristics in terms of how relevant they are to the programme and what impact the programme will have on each of them.

In line with the EQIA requirements for the above proposals, these have been considered and details of its findings are included as an Equalities Impacts Summary which is **Appendix C** of the Air Quality Update to Parking Policies and Procedures Cabinet report.

9. Approvals

Report Originator Project Manager (Highways & Traffic – Major Projects)	Murray Woodburn	Signed: 	Dated:
Principal Officer, Traffic Orders	Neil Barker	Signed: 	Dated: 02/07/2020
Principal Officer, Parking Design	Diane Bourne	Signed: 	Dated: 02/07/2020

I approve the above recommendations:

Assistant Director, Highways and sustainable transport	Graham Cox	Signed: 	Dated: 03/07/2020
Corporate Director, Environment, and Sustainable Transport	Jamie Blake	Signed: 	Dated: 03/07/2020

10. Attachments

Appendix A: Results of the March 2020 consultation about the draft Parking Policy and Procedures

Appendix B: Revised draft Parking Policy and Procedures for approval (subject to the outcome of the statutory consultation on emission-based permits and any necessary approvals).

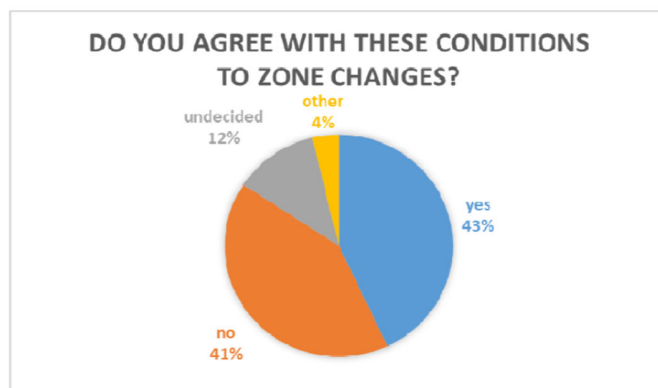
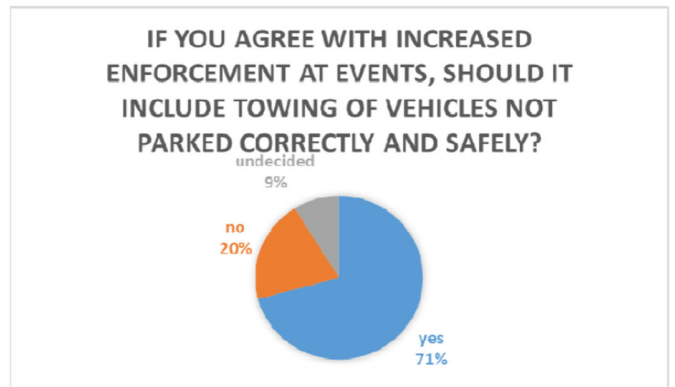
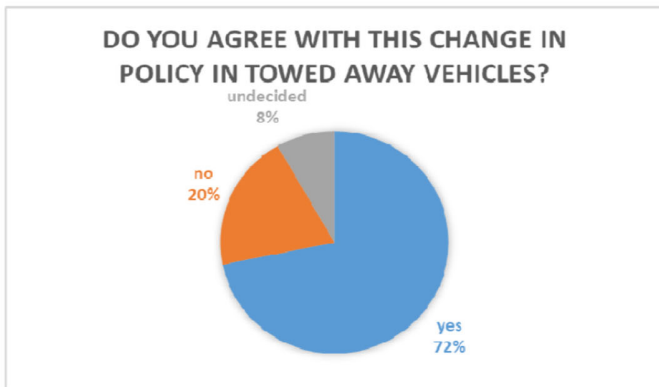
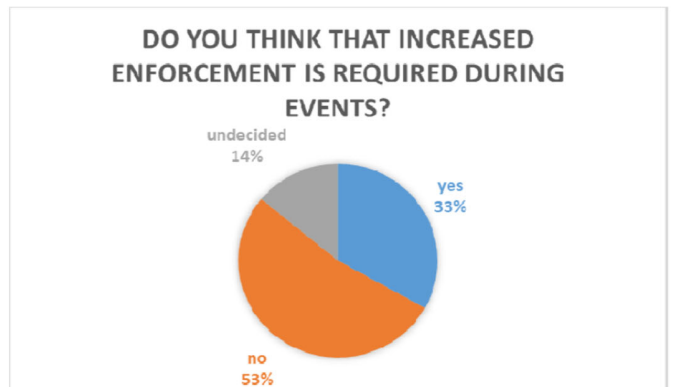
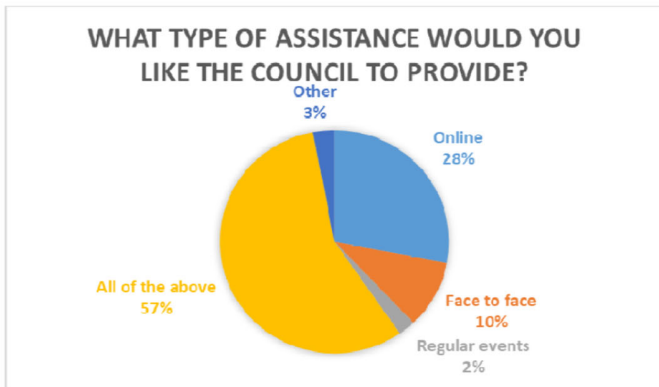
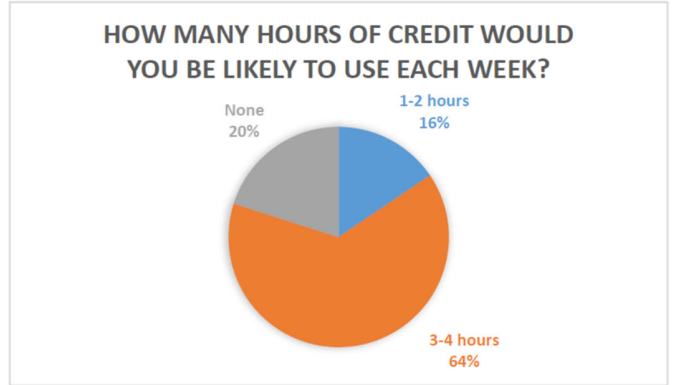
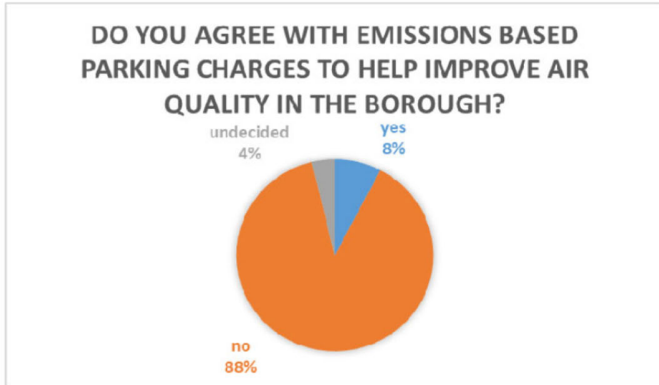
Appendix C: Details of changes made to the draft Parking Policy and Procedures Document
(including details of changes to permits)

Appendix D: Existing and proposed permit charges

Appendix E: Statement of Reasons.

Appendix A: Results of the March 2020 consultation about the draft Parking Policy and Procedures
 (subject to the outcome of the statutory consultation on emission-based permits and any necessary approvals).

Appendix A: Results of the March 2020 consultation about the draft Parking Policy and Procedures



Appendix B: Revised draft Parking Policy and Procedures for approval
Details are provided in a separate document.

Appendix C

Details of Changes to the 2016 Parking Policy and Procedures document:

1. Increase in on and off-street parking charges by 15% borough wide, as detailed in **Appendix D**;
2. Increase in permit charges by approximately 15% borough wide as detailed in **Appendix D**;
3. Introduction of emissions based charges borough wide as detailed in **Appendix D**;
 - The charge for a second or subsequent resident parking permit will now consist of two components: an emissions based charge (which could be nil) added to an additional vehicle permit charge. The new on-line system will allow for the replacement of paper visitor permits with virtual 'parking wallets' and the introduction of 'parking credits' for residents. Parking wallets will allow for residents to be allocated an amount of credit for free parking in town centres and for other important family or social trips. All current visitor permit entitlements will be retained in the new parking wallets, with the purchase of further visitor permits possible. Introduction of Virtual Permits borough wide.
4. Introduction of the "Parking Wallet"
 - The new on-line system will allow for the replacement of existing paper visitor permits with 'virtual parking wallets' and 'parking credits' for residents. Parking wallets will allow for residents to be allocated an amount of credit for free parking in town centres and for other important family or social trips. All current visitor permit entitlements will be retained in the new parking wallets, and these will be supplemented by further allocated parking credits, with the purchase of further visitor permits and credits possible.
5. Changes to Resident Visitor Permit types from 6, 10 and 24 hours to 6, 12 and 24 hour permits
 - The change of permit timescale from 10 to 12 hours is being implemented to accommodate a large number of existing RPZs that operate over a mid-range timescale e.g. more than 10 hours but does not warrant the use of a 24 hours permit.
6. Free monthly parking allocation
 - Within the wallets, resident permit holders will also get an allocation of 2 hours (per household/per month) to enable them to park in permit holder or shared use bays in any RPZ in the borough. This will enable 'free' parking in local town centres to support local businesses.
7. Discounted Business Permit for charities
 - These will now be made available to Newham based charities who require the use of a vehicle to undertake visits to premises other than their registered charity address within the borough. Applicants can apply for a standard business permit and on submission of their eligibility will receive a business permit at a reduced (50%) rate.
8. Delivering 'Healthy Streets'
 - Excessive numbers of parked vehicles detract from the appearance and ambience of Newham's streets and make it more difficult for pedestrians and cyclists to get around. While the closest public space to most people's home is the road outside, that road is often dominated by vehicles – both moving and parked, and the use of that space by residents is severely constrained as a result. Central to addressing this hostility of streets to those who live on them and use them is the concept of 'Healthy Streets'. The healthy street idea encourages the delivery of a wider range of outcomes from any improvement scheme than were previously considered.
9. Introduction of a formal process for the suspension of parking controls during major religious festivals
 - To balance the needs of worshippers and the wider community the council has introduced a process for suspending parking enforcement for a limited amount of time for major religious festivals. Each application will be assessed individually and enforcement will be relaxed on agreed date(s). Where possible a Travel Plan should also be submitted as part of the application process.

Details of Changes to the Draft Parking Policy and Procedures Document as approved in February 2020:

1. Minor amendments to text in line with current council practise;
2. The word Policies amended to Policy when referring to the document;
3. Pay and Display as a form of payment method amended to cashless payment system (currently PaybyPhone);
4. In store payment system included with PayPoint references;
5. Links updated where appropriate (some did not work);
6. IPZ information added in 3;
7. 3.35 majority of consultation results amended from 50% to 51%;
8. 3.4 Staged consultation approach amended from experimental to permanent process;
9. Parking Permit Eligibility Criteria at 3.6 amended in line with website criteria and to include IPZ permit application;
10. Scratch card dates amended as discussed;
11. Charity business and IPZ permits added at 3.11 Additional On-Street Parking Permits;
12. Major religious festivals and Public safety added to suspensions list in 3.12;
13. However, the council has the discretion to grant permits for larger vehicles if special circumstances apply added to 3.13 for Large Vehicles;
14. Casualty reduction date amended to 2021 in line with current government guidance for Mandatory School Keep Clear markings;
15. Blue Badge Concessions table amended in line with current legislation;
16. 'this is subject to review' added to parking facilities for Doctors;
17. Parking During Major Religious Festivals added at 3.34 and 4.2.6;
18. 'will review' added to the removal policy for residents;
19. Surrendered vehicles removed from the title of 4.7;
20. In 6.63 Access protection markings amended to include implementation of single yellow line across dropped kerbs and on request possible double yellow line and
21. Amendments to the proposed charges tables to include business charity permit type etc.

Appendix D - Existing and proposed permit charges

Existing Charges

Permit Type	Current Charge	Permit Type	Current Charge	Permit Type	Current Charge	Permit Type	Current Charge
Business (3 months)	£ 175.00	Industrial (3 months)	£ 75.00	Resident 2nd permit	£ 100.00	Resident Visitor 24 hour x 5	£ 25.00
Business (6 months)	£ 300.00	Industrial (6 months)	£ 150.00	Resident permit 3+	£ 200.00	School Visitor x 10	£ 15.00
Business (annual)	£ 600.00	Industrial (annual)	£ 300.00	Resident Visitor 6 hour x 10	£ 12.00	Trade per day	£ 2.00
Doctor	£ 45.00	Resident 1st permit	FREE	Resident Visitor 10 hour x 5	£ 15.00	Trade per week	£ 10.00
Carer (annual)		£ 10.00					

Proposed Charges

Resident Permits

The introduction of emission-based charges will mean the charge for a second or subsequent resident parking permit will now consist of two components: an emission based charge (which could be nil) added to an additional vehicle permit charge.

Annual Emission-based Charges

(To be read in conjunction with Annual Additional Vehicle Permit Charges)

Annual Additional Vehicle Permit Charges

(To be read in conjunction with Annual Emission-based Resident Charges)

HMRC Band	CO ₂ emissions (g/km)	Engine Size (c.c.) (Pre-2001)	Resident Permit Emission Tier Charge
A	0	1-600	Tier 1 Free
B	1 - 50	601-900	
C	51 - 75	901-1000	Tier 2 £60
D	76 - 90	1001-1200	
E	91 - 100	1201-1300	
F	101 - 110	1301-1399	Tier 3 £100
G	111 - 130	1400-1500	
H	131 - 150	1501-1650	
I	151 - 170	1651-1850	Tier 4 £150
J	171 - 190	1851-2100	
K	191 - 225	2101-2500	
L	226 - 255	2501-2750	Tier 5 £200
M	>255	>2750	

Resident Permit Surcharge Per Household	
1 st permit	Nil
2 nd permit	£100
3+ permits	£200

Other Proposed Parking Permit Charges

Permit Type	Charge	Permit Type	Charge
Carer (annual)	£ 10.00	Resident Visitor 24 hours x 5	£ 28.80
Doctor	£ 51.80	School Visitor x 10	£ 17.30
Resident Visitor 6 hours x 10	£ 13.80	Trade per day	£ 2.30
Resident Visitor 12 hours x 5	£ 17.30	Trade per week	£ 11.50

Business and Industrial Permits for 3, 6 and 12 Months

(There are no supplementary charges for additional business permits)

HMRC Band	CO ₂ emissions (g/km)	Engine Size (c.c.) (Pre-2001)	Business Permit Emission Tier and Charge	Reduced Tariff Business Permit (for eligible charities) Emission Tier and Charge	Industrial Permit Emission Tier and Charge
A	0	1-600	Tier 1 Free	Tier 1 Free	Tier 1 Free
B	1 - 50	601-900			
C	51 - 75	901-1000			
D	76 - 90	1101-1200	Tier 2	Tier 2	Tier 2
E	91 - 100	1201-1300			
F	101 - 110	1301-1399			
G	111 - 130	1400-1500			
H	131 - 150	1501-1650	£175 (3 month) £350 (6 month) £600 (annual)	£90 (3 month) £175 (6 month) £300 (annual)	£80 (3 month) £160 (6 month) £300 (annual)
I	151 - 170	1651-1850			
J	171 - 190	1851-2100			
K	191 - 225	2101-2500	Tier 3	Tier 3	Tier 3
L	226 - 255	2501-2750	Tier 4	Tier 4	Tier 4
M	>255	>2750			
			£200 (3 month) £400 (6 month) £750 (annual)	£100 (3 month) £200 (6 month) £375 (annual)	£100 (3 month) £200 (6 month) £375 (annual)
			£250 (3 month) £500 (6 month) £900 (annual)	£125 (3 month) £250 (6 month) £450 (annual)	£130 (3 month) £260 (6 month) £460 (annual)

Appendix E

Statement of Reasons

The following Statement of Reasons for proposing to make the traffic order/s is recommended for approval:

1. Newham is suffering an air quality emergency, with recent British Heart Foundation data showing the borough to be the most polluted in the UK, with living in Newham the equivalent of smoking 159 cigarettes a year.
2. Newham residents are exposed to more high levels of toxic pollution caused by vehicles causing the highest rate of deaths in England - that's 96 people dying prematurely each year.
3. Newham has the highest number of children admitted to hospital due to asthma-related conditions.
4. Local authorities are required to regularly review their parking policies and procedures and to have due regard for local, regional and national policies for modal shift towards more sustainable and less polluting modes of transportation.
5. The proposed revision to the Newham parking policies and the adoption of an emissions-based permit system is a response to the earlier consultation and aims to influence a shift towards less polluting modes of transport in Newham with the wider objective of improving air quality which is the worst in London.
6. A Cabinet Report approved in February 2020 authorised public consultation about changes to the Council's Parking Policy and Procedures to respond to the air quality challenge in the Borough, as motor traffic is a significant contributor to our poor air quality.
7. An Air Quality Action Plan has been produced as part of our legal duty to London's Local Air Quality Management strategy. It outlines the actions we will take to improve air quality in Newham up to 2024
8. The Council's existing Parking Policy and Procedures were implemented at a time when emissions-based permit charging was in its infancy. Subsequently many London boroughs have introduced some form of emissions-based permit charging and are finding the policy to be an effective tool in reducing vehicle emissions by influencing behavioural change and to help improve air quality. The proposed Newham Parking Policy and Procedures document includes the introduction of emissions-based parking charges similar to those already operating in many London boroughs.
9. Public consultation carried out in 2019 showed a majority of Newham residents wanting a reduction in car use and measures introduced to help improve the poor air quality in the Borough.
10. The proposed changes will not affect electric or ultra-low emission vehicle users as permits for the first such vehicle will remain free. Higher charges will only apply for more polluting vehicles.
11. The proposals accord with wider policy objectives for reducing traffic and improving air quality in London and are broadly in line with the majority of other London boroughs who already operate emissions-based permits. The proposed emissions-charges in Newham are fair and amongst the lowest in London and offer free permits for the lowest polluting vehicles.