



Executive
11 August 2010

**Report from the Director of
Environment and Culture**

Wards affected:
ALL

The introduction of a vehicle emission-based charging regime for residents parking permits.

1.0 Summary

- 1.1 This report sets out details of a proposal to generally increase charges for residents permits for parking on the highway (within Controlled Parking Zones (CPZs)) at the same time as introducing a full vehicle emission based charging regime.
- 1.2 The report explains that the proposal will encourage residents to consider the contribution their vehicle makes to CO₂ emissions and climate change whilst revising the charge for an “average” vehicle so that it is more closely aligned to permit charges in other London boroughs with similar parking conditions and practices.
- 1.3 The report recommends that the Director of Environment & Culture is instructed to undertake the advertising of the necessary Traffic Orders to introduce the new charges and regime, and to the undertaking of appropriate consultation into the proposals.
- 1.4 The report recommends that the Executive delegate authority to the Director of Environment & Culture to consider all representations made during the consultation and subsequently, having given consideration to those representations and if appropriate, introduce the amended regime and charges from 1st April 2011 or as soon as practicable after that date.
- 1.5 The report also recommends the introduction of a “permit surrender prize” scheme for existing resident permit holders and the introduction of a permit which allows users of car club cars to park free of charge within any CPZ in Brent as incentives for residents to reduce non-essential car use and contribute to combating climate change.

- 1.6 Finally, the report recommends that the Executive agrees that opportunities to introduce a vehicle emission based regime for business and other parking permits should be explored.

2.0 Recommendations

- 2.1 That the Executive agrees to the introduction of a vehicle emission based regime and new charges for residents parking permits and accordingly instructs the Director of Environment & Culture to undertake appropriate consultation and the advertising of Traffic Orders in association with the Council's intention to introduce the new charges and charging regime for residents parking permits as set out in this report,
- 2.2 That the Executive delegates authority to the Director of Environment & Culture to subsequently consider all representations received in relation to the proposals and, having considered those representations and if appropriate, and making any modifications, makes the proposed Traffic Orders to introduce the proposed regime and charges.
- 2.3 That the Executive instructs the Director of Environment & Culture to introduce a "permit surrender price" scheme and a scheme to allow users of car club cars to park free of charge within parking bays in any CPZ within Brent and to amend, following consultation, the relevant Traffic Orders.
- 2.4 That the Executive requires the Director of Environment & Culture to explore opportunities to introduce a vehicle emission based regime for business and other parking permits and bring suitable proposals to the Executive at an appropriate time.

3.0 Detail

3.1 Global and national context

- 3.1.1 Carbon Dioxide (CO₂) is one of the principle greenhouse gases that are contributing to predicted climate change. The transport sector is currently estimated to contribute in excess of 20% of all UK greenhouse emissions – roughly equivalent to 100 million tonnes of CO₂ per annum. One estimate is that personal travel produces in excess of 10% of UK total greenhouse emissions.
- 3.1.2 The Climate Change Act 2008 makes it the duty of the Secretary of State to ensure that the net UK carbon account for all six Kyoto greenhouse gases for the year 2050 is at least 80% lower than the 1990 baseline.
- 3.1.3 A key element of Government strategy relates to vehicle emissions. The "Powering Future Vehicles Strategy" (2002) outlined the aspiration that the UK should lead the global shift to a low carbon transport economy.

One target within this strategy is that, by 2012, 10% of all new car sales should be low carbon (with CO₂ emissions of 100g/km or less). This is consistent with an earlier agreement between the European Commission and the European Automotive Manufacturers Association to reduce CO₂ emissions from new cars by 25% to an average of 140g/km by 2008.

In fact the average level of CO₂ emissions for new cars has fallen by 13.1% since 1997 to 164.9g/km and total CO₂ emissions from all cars in use has fallen by 4.8% over the same period (DEFRA 2008).

There are numerous strands to the Government's strategy to reduce greenhouse gas emissions and hence combat climate change. In the context of this report the two relevant strands are (i) policies around road traffic reduction and (ii) the taxation (Vehicle Excise Duty) regime, first introduced in 2001 and subsequently strengthened, which essentially (financially) incentivises buyers of cars to move to lower emitting vehicles.

Appendix "F" sets out the emission based regime for VED introduced in 2001 and the current scale of charges.

3.2 Regional and local context and comparators.

3.2.1 The Mayor for London is responsible for the transport strategy for London. Successive Mayor's Transport Strategies have set out policies and proposals that would contribute to reducing transport emissions as a contribution to improving the environment and combating climate change.

The Mayor's Transport Strategy (May 2010) sets out an approach to reducing CO₂ emissions from ground based transport around 3 core themes. Two of those themes are "Supporting & enabling the development and use of low carbon vehicles" and "Carbon efficient mode choice – improving the attractiveness of low carbon modes of transport".

Linked to these core themes are proposals which include:

Proposal 98 – "The Mayor through TfL, and working with the London Boroughs, car club operators, and other stakeholders, will support the expansion of car clubs and encourage their use of ultra low carbon vehicles and

Proposal 124 – "The Mayor, through TfL, and working with the London Boroughs,...will encourage implementation of pricing differentials based on vehicle emissions, including banded resident parking permits and other on and off-street parking charges..."

3.2.2 In 2007, the London Borough of Richmond upon Thames introduced the first emission based charging structure for resident and other parking permits in London. It included a differential charging structure for second and subsequent permits.

The Richmond regime applied differential charges for residents' permits utilizing the Vehicle Excise Duty (VED) "road tax" emission related bands for vehicles registered on or after 1st March 2001 and engine size (cylinder capacity) for vehicles registered before that date.

The regime introduced in Richmond also varied the charges across the Borough according to the nature and operating times of the various CPZs.

In introducing their regime Richmond set a precedent for the process of introducing such regimes and a model arrangement for application, with local variations, elsewhere in London.

Subsequent to Richmond introducing their regime, similar regimes have been introduced in 7 other London boroughs. These are listed, together with their annual charges, at Appendix "A".

Appendix "B" summarises current annual charges for residents permits in all London Boroughs at the current time. It illustrates that there is a wide range of charges and a variety of charging regimes. All Council's review their parking charges periodically, sometimes annually, and it is likely that many will amend their charges and arrangements in the next few months.

Appendix "C" sets out the charges for Boroughs that are adjacent to Brent.

On 12th July 2010, Richmond Council resolved to abandon their emission based charging regime. Their Cabinet agreed to "simplify CPZ permit charges in line with a detailed manifesto pledge made by the new Administration...to move away from the complex and confusing emission based taxation structure" in line with a commitment to "reduce levels of taxation". The relevant report says there is no clear evidence of the regime changing behaviours and that there is "some evidence of movement away from upper (emission) bands to lower bands....but the percentage was small and more likely to be influenced by other factors...such as VED". The report contains no supporting data/evidence.

The stance taken by Richmond is contrary to the view presented by the Mayor for London in the Mayors Transport Strategy which states "parking controls have been identified as one of the key measures that can be implemented at a local level to encourage the purchase and use of road vehicles with low CO₂ and air pollutant emissions."

3.3 The Brent Context

- 3.3.1 The Council is committed to making a positive contribution to combating climate change. It is a signatory to the Nottingham declaration on climate change. The Brent Climate Change Strategy, launched in December 2009 has three principal aims, one of which is to "cut emissions produced by the Boroughin every sphere....the way we move around.

- 3.3.2 The Council's Transport Strategy is set out in the Local Implementation Plan (LIP) adopted in 2005/6 and currently being revised in response to the Mayors Transport Strategy. The LIP states that the Council's strategy for improving the environment, promoting economic growth and addressing social issues is through a transport policy and associated programmes that support the use of sustainable transport modes and discourage non essential car use.
- 3.3.3 Parking policy and practice is an important element of transport policy and the Council's approach is summarised within the Parking Enforcement Plan (PEP) which forms part of the LIP. The PEP states that when "reviewing parking permit charges the Council will take into consideration the need to encourage a shift to vehicles that have the lowest negative externalities and set permit prices based on DVLA (VED) charging models".
- 3.3.4. Currently, approximately 25% by area of Brent is covered by CPZs and these are located in the south-east and south areas of the Borough – generally closer to inner London. At any one time there are approximately 17,000 residents permits in use – although this figure includes permits of 1,3 or 6 months duration as well as annual permits.
- 3.3.4 Historically, the Council has adopted a system of permit charges that applies Borough-wide. That is, the same permit charge is made (for the same type of car) regardless of the location of the CPZ or it's hours of operation.

Brent currently has a "loose" emission based regime for resident permit charges as shown in Table 1 below:

Vehicle	Charge
Cars registered before March 2001 with engine size below 1200cc or registered after March 2001 in DVLA emission band A,B or C.	Nil
All other vehicles	£50
2 nd permit	£75
3 rd permit	£100
Visitor permits	£100

Table 1: Current Brent resident permit charges.

In 2007/08 the "nil" charge for smaller vehicles was introduced. Prior to that change the charge of £50 for a first permit had remained unchanged for more than 10 years.

- 3.3.5. There have been significant improvements in the arrangements and infrastructure associated with transport modes (walking, cycling and public transport) that are recognised as being more sustainable than car use since the original charging regime was introduced. Facilities, infrastructure, training and information for cycling have improved. Similarly the quality of, accessibility to and information on, public transport (particularly in relation to buses) has improved. Furthermore, recent years have seen the introduction and expansion

of city car clubs which provide an opportunity for residents to have access to a car for essential car use whilst avoiding ownership.

3.3.6. An analysis of Appendices “A” and “B” and associated information illustrates that comparison between Brent charges and those of other Boroughs is difficult and subjective because charges reflect the parking pressures within those Boroughs (which can vary significantly within Boroughs and from Borough to Borough), the political and transport policies and the economic well-being of the Boroughs.

The analysis demonstrates that:

- (i) Brent is the only Borough that makes no charge for all cars with an emission rating of less than 110gCO₂/km or with an engine size of 1200cc
- (ii) That the average charge made by Boroughs with emission based regimes for vehicles in the 151-175gCO₂/km category is £82,
- (iii) That charges in Boroughs that can be considered broadly “similar” to those parts of Brent where CPZs exist in terms of location, parking stress and economic well being are broadly around £80-£100 per annum,
- (iv) That charges in neighbouring Boroughs range from £25-45 (Ealing) to £84-£162 (Camden)

4. Proposals

4.1 The current charging regime and charges for resident parking permits in Brent:

- contribute little to persuading residents to contribute to road traffic reduction within the Borough in the context of the many improvements that have been made (by the council and its’ transport partners) in sustainable transport facilities, infrastructure and services,
- fail to provide encouragement for residents to own vehicles that cause less environmental damage through CO₂ exhaust emissions or to discourage those residents who own less environmentally friendly vehicles,
- are inconsistent with the charges made by boroughs with broadly similar parking conditions and practices,
- have not been adjusted so as to be aligned with the value of parking space in London, the general cost of motoring and transport or of operating the service.

4.2 It is proposed to introduce a differentiated emissions based charging regime for residents’ permits that will address the issues set out in 4.1 above. The regime would introduce a wider range of charges (than the current 2) according to the emission rating of the vehicle taken from the DVLA banding.

There will be 7 differently priced bands. The cost of a permit will increase with the emission value (gCO₂/km) of the vehicle.

Vehicles registered prior to March 2001 (for which there is no nationally recognised emission rating) will be charged according to engine size – using 7 bands.

Currently, the cost of a 2nd and 3rd permit is charged at 50% and 100% greater respectively than the charge for the 1st permit. It is proposed that this arrangement should continue – subject to minimum charges of £75 and £100 (the current charges) and a maximum charge of £300.

The proposed charging regime for 12 month residents permits is shown at Appendix “D”.

It is proposed to set the charge for a visitor permit at the equivalent of the highest resident permit charge being paid at that address at the time of purchase plus a premium of £10 – subject to a minimum charge of £110 and a maximum charge of £300.

At present, residents are able to purchase permits for 1,3 or 6 months at a cost equal to the pro-rata charge for a 12 month permit plus an administration charge of £6. It is proposed that arrangement continues.

- 4.3 As an incentive to encourage residents to consider their travel choices it is also proposed to introduce a “permit surrender prize” scheme.

Under this scheme any resident that chooses to return an existing resident permit and agrees not to purchase another for a period of 2 years will be granted a voucher to the value of £200 towards the cost of being a member of a city car club or the purchase of a bicycle or “oyster” travel.

The scheme would need to have conditions to preclude fraud.

- 4.4 As an additional incentive to those residents who may be encouraged to join city car clubs by the proposed emission based regime of charges, or those that are current members, it is proposed to introduce a car club all zone permit.

At present car club cars have permits which permit them to park in car club bays and in other bays only within the CPZ in which that car is based.

The introduction of a permit which allows users of car club cars to park in any resident parking bay in the Borough free of charge during CPZ operational hours would reduce the administrative burden on car club operators and provide a small financial incentive to car club members – with little risk of encouraging non-essential journeys, significantly increasing parking stress in residents bays or reducing income from pay and display arrangements.

- 4.5 At this time it is not proposed to introduce an emission based regime for permits other than residents' permits. Nevertheless it is recognised that all permit holders will contribute to CO₂ emissions in the Borough and hence climate change. Accordingly it is proposed to develop an appropriate regime for other permit holders and present it to the Executive for consideration at the earliest opportunity
- 4.6 The proposed regime and charging structure set out in this report is considered to be one that will be broadly understood and relatively simple to administer and adjust as required in the future. It is consistent with the principles for the review and setting of parking charges as set out in the LIP and Parking Enforcement Plan.

5.0 Financial Implications

- 5.1 The council currently has no comprehensive and accurate information relating to the type of vehicle (by CO₂ emission type) owned by its' resident permit holders held in a way that can be readily analysed. Historically there has never been a need to capture that information in a systematic way.

Similarly it is not possible to predict with certainty the proportion of residents with permits that will change their vehicle type or cease to apply for a parking permit as a result of the introduction of the regime and charges proposed.

As a consequence it is not possible to predict with certainty the financial implications of the introduction of the proposed regime. Nevertheless, using the results of a sample survey of recent permit applications an approximation of the Brent (resident permit) car population by emission band and engine size (prior to March 2001) has been used to model the additional income that may be generated by the proposal.

The car population approximation used in the model is shown at Appendix "E" .

- 5.2 During 2009/10 income derived from the sales of residents permits was £0.894m

Using the car population approximation model it is estimated that the additional (first year) full year income associated with the introduction of the proposal would be £1.1m.

This estimate includes an assumption that a proportion of residents would renew their permits early to avoid increased charges in the first year and an assumption that a proportion of residents may choose not to renew their permits (as a result of being able to find alternative off street parking provision/arrangements or by ceasing to own a vehicle) or may choose to move to a lower emission rated vehicle.

The estimated cost of introducing the scheme proposed (publicity, Traffic Orders, IT system changes, staff training etc) is estimated to be in the order of £75,000 and would be incurred in the 2010/11 financial year.

There would be no significant additional and on-going revenue costs associated with administering the scheme once introduced.

Hence, if the regime and charges set out in this report are introduced from 1st April 2011 an estimated additional income of £1.1m would be generated in the 2011/12 financial year.

- 5.3 Whilst it is reasonable for a Council to take due regard of estimated costs and income arising from the management of parking, is not lawful for a Council to use the Road Traffic Regulation Act 1984 to impose charges to raise revenue.

The proposals outlined in this report are consistent with the policy objectives outlined within the report.

The additional income estimated from the proposals may vary according to (i) the accuracy of the model used and (ii) whether or not the regime, together with other associated initiatives, contributes to the policy objectives behind the proposal.

In essence, the long-term effect on income levels cannot be measured as it is hoped that the effect of the new Charging Mechanism would be to reduce the use of High Emission vehicles”.

- 5.4 Local authorities are required to keep a separate account of their income and expenditure in respect of parking. Furthermore, Local Authorities are prohibited from spending any surpluses in the PPRA on anything other than the management of parking or other transport related expenditure.

The costs and income associated with the proposal will be incorporated within the Parking Places Revenue Account (PPRA) for 2010/11 and beyond.

6.0 Legal Implications

- 6.1 The Council is empowered by the Road Traffic Regulation Act (RTRA) 1984 (as amended) and the Road Traffic Act 1991 to provide parking places on and off the highway and to charge for their use. Section 45(1) of the RTRA 1984 provides the power to designate by order, on-street parking places. Section 45(2) (b) extend the means to charge for such parking places.

The proposals would be introduced by making a Traffic Regulation Order under the RTRA. The procedure for doing this is set out in Regulations and requires:

Consultation with organisations representing persons who use any road to which the Order relates, or are likely to be otherwise affected,

Publication of proposals and providing documents for inspection,

Inviting written objections to proposals following publication,

Consideration of objections made.

Section 122(1) of the RTRA specifies that an Authority has a duty "...to exercise the functions conferred on them by this Act as (so far as practicable having regard to the matters specified in sub-section (2) below to secure the expeditious convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway"

The matters at Section 122 (2) include (i)The effect on amenities of any locality (ii) The strategy prepared under Section 80 of the Environment Act 1995 (Air Quality Strategy) and (iii) Any other matters appearing to the local authority to be relevant.

The Authority is therefore permitted to consider Air Quality and Environmental matters when determining the parameters of a new parking scheme.

Section 45 of the RTRA permits differential parking based on vehicle emissions and that regard may be had to environmental considerations in creating a parking regime under the RTRA.

Furthermore, local authorities have wide ranging powers under the Local Government Act 2000. These are wide ranging powers that allow authorities to do anything which they consider is likely to achieve objectives listed and include the promotion or improvement of the environmental well-being of their area.

7.0 Consultation

7.1 As described above, the legislation prescribes the form of statutory consultation for the making of the Traffic Order associated with the proposals described. This requires the advertising of proposed Orders in the local press and by way of street notices.

However it is also essential that the proposals are put in the public domain and reasonable engagement methods are utilized, in addition to the statutory process, to afford those affected by the proposals opportunity to assess the impact of the proposals and make representations and objections prior to the proposals being implemented.

Accordingly the Director of Environment & Culture will embark on a communications strategy (comprising, but not limited to, information in Brent Magazine, press releases, website information, and leaflets in the parking shops and Council offices) so as to alert the wider community to the proposals prior to the advertising of the Traffic Orders.

- 6.2 All representations received in advance of and subsequent to the advertising of Traffic Orders will need to be properly considered prior to the decision on whether or not to introduce the proposals.

This report recommends that authority is delegated to the Director of Environment & Culture to consider those representations.

Background Papers

Brent Local Implementation Plan (2006-11)
Brent Climate Change Strategy (Dec 2009)
(London) Mayors Transport Strategy (May 2010)

Contact Officers

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Appendix A

Details of annual resident permit charges in those Boroughs with emission based permit regimes.

Camden

Band	1	2	3	4
Vehicle Emissions (gCO ₂ /km) Range – for vehicles registered post March 2001.	Less than 150.	151-185	186-224	224+
Vehicle engine size (cc) – for vehicles registered pre March 2001	0-1299	1300-1849	1850-2449	2450+
First permit annual cost.	£84	£99.80	£121	£162

Haringey

Band	1	2	3	4
Vehicle Emissions (gCO ₂ /km) Range – for vehicles registered post March 2001.	Less than 100	101-150	151-185	186+
Vehicle engine size (cc) – for vehicles registered pre March 2001		Less than 1549	1550-3000	3000+
First permit annual cost.	£15	£30	£60	£90

Islington

Band	A	B	C	D	E	F	G
Vehicle Emissions (gCO ₂ /km) Range – for vehicles registered post March 2001.	Less than 100	101-120	121-150	151-165	166-185	186-225	225+
Vehicle engine size (cc) – for vehicles registered pre March 2001		Less than 1100	1101-1399	1400-1500	1501-1850	1851-2500	2500+
First permit annual cost.	£0	£35	£55	£70	£85	£160	£200

Lambeth

Band	1	2	3	4	5	6
Vehicle Emissions (gCO ₂ /km) Range – for vehicles registered post March 2001.	Less than 100	101-120	121-165	166-185	186-225	225+
Vehicle engine size (cc) – for vehicles registered pre March 2001			Less than 1550		1550-3000	3000+
First permit annual cost.	£0	£90	£115	£135	£180	£200

Royal Borough of Kensington & Chelsea

Band	1	2	3	4	5	6	7
Vehicle Emissions (gCO ₂ /km) Range – for vehicles registered post March 2001.	Less than 100	101-120	121-150	151-165	166-185	186-225	225+
Vehicle engine size (cc) – for vehicles registered pre March 2001			Less than 1549			Greater than 1549	
First permit annual cost.	£66	£88	£99	£110	£121	£132	£154

Tower Hamlets

Band	A	B	C	D	E	F	G	H
Vehicle Emissions (gCO ₂ /km) Range – for vehicles registered post March 2001.	Less than 100	101-120	121-150	151-165	166-185	186-225	225-325	325+
Vehicle engine size (cc) – for vehicles registered pre March 2001		Less than 1100	1101-1300	1300-1600	1601-1800	1801-2000	2001-3000	3000+
First permit annual cost.	£0	£40	£50	£70	£90	£110	£125	£150

Richmond upon Thames

Complex regime where costs vary according to zone, 13 emission bands and 6 engine size bands – Price for first permit varies between £0 and £300 pa.

Waltham Forest

Band	1	2	3
Vehicle Emissions (gCO ₂ /km) Range – for vehicles registered post March 2001.	Less than 120	121-225	225+
Vehicle engine size (cc) – for vehicles registered pre March 2001	Less than 900cc	900-3000	3000+
First permit annual cost.	£22.50	£30	£100

Appendix B

Details of annual resident parking permit charges in all London boroughs*

Borough	Annual charge (£)
Camden	84.00
City of London	No regime
Hackney	115.00
Hammersmith & Fulham	99.00
Greenwich	15.00-50.00
Islington	55.00
Kensington & Chelsea	99.00
Lambeth	115.00
Lewisham	60.00
Newham	0
Southwark	75.00
Tower Hamlets	50.00
Wandsworth	95.00
Westminster	85.00-120.00
Barnet	40.00
Barking & Dagenham	22.50
Bexley	35.00-70.00
Brent	50.00
Bromley	35.00-75.00
Croydon	48.00
Ealing	25.00 or 45.00
Enfield	30.00 or 70.00
Harrow	46.00
Haringey	No regime
Hounslow	40.00-60.00
Havering	13.20
Kingston	60.00
Merton	65.00
Richmond	22.50-300.00
Redbridge	55.75
Sutton	35.00 or 40.00

*Notes

For those boroughs with a vehicle emission based residents permit regime the cost shown is for an "average" vehicle (130gCO₂/km).

Where a range or values are shown this is where the cost varies according to the CPZ.

Charges relate to first permits.

Appendix C

Details of annual resident parking permit charges in neighbouring boroughs to Brent*

Borough	Annual charge (£)
Barnet	40.00
Camden	Emission based regime – range 84.00 to 162.00
Ealing	25.00 or 45.00 (depending on zone)
Harrow	46.00
Hammersmith & Fulham	99.00
Kensington & Chelsea	Emission based regime – range 66.00 to 154.00
Westminster	“Loose” emission based regime – 85.00 or 120.00

Note : Charges relate to first permits.

Appendix D.

Proposed charges – annual residents parking permit in Brent.

For vehicles registered on or after 1st March 2001:

"Brent band"	1	2	3	4	5	6	7
Vehicle Emissions (gCO ₂ /km)	Less than 110	110-130	131-150	151-175	176-200	201-255	255+
First permit annual cost (£)	0	50	75	100	125	150	200
Second permit annual cost (£)	75	75	113	150	188	225	300
Third permit annual cost (£)	100	100	150	200	250	300	300

For vehicles registered before 1st March 2001:

"Brent band"	1	2	3	4	5	6	7
Vehicle engine size (cc)	Less than 1100	1001-1200	1201-1550	1551-1800	1801-2400	2401-3000	Over 3000
First permit annual cost (£)	0	50	75	100	125	150	200
Second permit annual cost (£)	75	75	113	150	188	225	300
Third permit annual cost (£)	100	100	150	200	250	300	300

Visitor permits (annual)

To be charged at a cost equivalent to the maximum permit being charged at that household plus £10 – subject to a minimum charge of £110 and a maximum charge of £300.

Appendix E

Estimate of vehicles (owned by Brent resident permit holders) within proposed charging bands.

"Brent band"	1	2	3	4	5	6	7
Emission value or engine size	Less than 110 gCO ₂ /km or 1000cc	110-130 gCO ₂ /km or 1001-1200cc	131-150 gCO ₂ /km or 1201-1550cc	151-175 gCO ₂ /km or 1551-1800cc	176-200 gCO ₂ /km or 1801-2400cc	201-255 gCO ₂ /km or 2401-3000cc	Over 255 gCO ₂ /km or 3001cc
Estimated % of permits within band	6	6	21	31	22	11	3

Note: Estimate based on a sample analysis of permit applications received (new and renewals in July 2010).

Appendix F

**Current DVLA annual vehicle licence banding structure and charges
(cars registered after March 2001.)**

DVLA Band	Emissions rating (gCO ₂ /km)	Annual charge (petrol or diesel vehicles) £
A	Up to 100	Nil
B	101-110	20
C	111-120	30
D	121-130	90
E	131-140	110
F	141-150	125
G	151-165	155
H	166-175	180
I	176-185	200
J	186-200	235
K	201-225	245
L	226-255	425
M	Over 225	435

**Current DVLA annual vehicle licence banding structure and charges
(cars registered before March 2001.)**

Engine size (cc)	Annual charge £
Not over 1549cc	125
Over 1549	205