

EQUALITY IMPACT ASSESSMENT AND ANALYSIS (EqIAA)

Name of Function under consideration:	Residents Parking Policy & Procedure
Is this Function 'Major', 'Minor yet likely to have a major impact' or 'Neither'	Minor yet likely to have a major impact
Date(s) of completing the EqIAA:	October/November 2013
Person(s) completing the EqIAA:	Principal Transport Planning Officer, Transport Planning Officer, Corporate Equalities Officer

SECTION 1 – INTRODUCTORY INFORMATION

1. What is the main purpose of the Function?

To agree a new policy and process for the implementation of residents parking schemes in South Gloucestershire. These are schemes where only permit-holding residents are allowed to park on-street in identified areas in order to address on-street parking problems caused by too many non-residents parking there.

2. List the main activities of the Function:

Under the provisions of the policy and process, there would be several basic steps to deciding on the need for a residents parking scheme. At the start of the process, following a request by local residents, the following questions would be investigated by Council officers:

1. Is there a parking problem?
2. If a parking problem is present, what form does it take?
3. What options are available to resolve the problem and is a residents parking scheme the most appropriate?

If it seems that a residents parking scheme might be an appropriate solution to a problem, there would be further steps that would then need to be undertaken by the Council to introduce the scheme:

1. Assessment of level of local support for such a scheme.
2. Site visit(s) and preliminary investigation.
3. Parking survey.
4. Consultation with affected residents.
5. Scheme design and implementation (if previous steps are fulfilled and show that a scheme is likely to be the best solution).

The policy sets an annual charge for a resident's permit if a scheme is implemented. This will be £30 for a household's first permit and £45 for the second. In most instances a maximum of two permits would be allowed per household. These annual charges would be required to enable the Council to recoup the ongoing costs of operating and enforcing a residents parking scheme.

However, the proposed policy says that disabled residents in possession of a 'blue badge' would be exempt from the charges so they would not have to pay. The proposed policy also says that permits issued to blue badge holders would not count towards the maximum total of permits allowed for a household.

3. Who are the main beneficiaries of the Function?

Local residents in South Gloucestershire. The proposed policy would only be used where South Gloucestershire residents request that the Council investigates perceived local on-street parking problems.

4. How is the overall success of the Function measured?

By the reduction in perceived parking problems experienced by local communities where they live.

5. What equality monitoring systems are in place to carry out regular checks on the effects of the Function on equality groups?

As and when requests to investigate perceived parking problems in residential areas are received, if a residents parking scheme appears to be a potential solution, the potential scheme would be subject to South Gloucestershire Council's Consultation Procedure. This will be carried out in accordance with the Council's 'Consultation Framework' (which includes 'Customer Insight' equalities guidance and monitors impacts in respect of protected characteristic groups as defined by the Equality Act 2010). This will ensure that the implementation of the policy is continually checked and monitored.

6. What are your equality related performance indicators/measure of success for this Function?

The results of the consultation identified in question 5 above and the reduction in on-street parking problems for residents where residents parking schemes are implemented.

SECTION 2 – INITIAL ASSESSMENT OF IMPACT

7. Assessment of equalities impacts.

The proposed Residents Parking Policy proposes that an annual charge is levied. Charges would be required to be made in order to allow the Council to recoup ongoing administrative and enforcement costs. It should be noted that the Council would bear the costs associated with setting up residents parking schemes.

There is evidence to show that disabled people¹, older people^{2 3} and people from minority ethnic backgrounds⁴ have proportionately lower levels of income and would therefore be impacted due to having a lower ability to pay for fees associated with residents parking schemes.

In relation to disabled people, the proposed residents parking policy says that disabled residents in possession of a 'blue badge' would be exempt from the charges so they would not have to pay. The proposed policy also says that permits issued to blue badge holders would not count towards the maximum total of permits allowed for a household. This is in recognition of how important an issue transport is for disabled people.

Further concessions for those on lower incomes have been carefully considered by the Council during the preparation of the proposed policy. However the introduction of concessions further to those proposed for disabled residents would undermine the Council's ability to recoup ongoing administrative and enforcement costs which could jeopardise schemes' effective functioning. In any case, potential schemes would be fully consulted upon prior to implementation and would only come forward where local residents submit requests. Consultation will allow the full consideration of all feedback received. Schemes would also be subject to a democratic vote and would only be implemented where at least 70% of the residents vote in favour.

¹ Source: Guy Parckar, Leonard Cheshire Disability, 2008. Figures based on the 'relative poverty line' in the UK, which equates to living in a household with income of less than 60% of median national income. Recent estimates suggest that around 30% of disabled people live below this income line, compared to around 16% of non-disabled people.

² One in six pensioners (1.8 million or 16% of pensioners in the UK) live in poverty, defined as 60% of median income after housing costs. Pensioners are also the biggest group of people on the brink of poverty with 1.2 million on the edge. Women, those age 80 to 84, single people living alone, private tenants, and Pakistani and Bangladeshi people are at greater risk of pensioner poverty. *Source: Age UK*

³ Source: Office for Disability issues

- In Britain over 10 million people have a limiting long term illness, impairment or disability - this is over 18 per cent of the population.
- The most common types of impairment for adults in Britain are those associated with a difficulty in mobility, lifting and carrying.
- The occurrence of disability increases with age - around 1 in 20 children are disabled, compared to around 1 in 7 working age adults and almost 1 in 2 people over state pension age.
- The likelihood of multiple impairments increases with age.

⁴ Source: Joseph Rowntree Foundation programme paper: *Poverty and ethnicity. Inequality within ethnic groups*. Lucinda Platt, May 2011. ISBN 978 1 85935 813 9

The following table provides an overview of impacts.

Equality Group	Negative Impact	Positive Impact	No Impact	Unsure of Impact	Reason(s)	
Women/Girls	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Any introduction of residents parking schemes would affect all people living in its vicinity equally. However the Council recognises that transport and parking is particularly important for disabled people and therefore the policy contains concessions for disabled drivers.	
Men/Boys	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Lesbians, gay men & bisexuals	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Transgender people	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
White people (including Irish people)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Asian or Asian British people	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Black or Black British people	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
People of mixed heritage	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Chinese people	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Travellers (gypsy/Roma/Irish heritage)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
People from other ethnic groups	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Disabled People:						There would be a negative impact for everyone as they would be charged, however, this is balanced by a positive impact realised through the introduction of schemes which would afford local residents greater parking opportunity. A full process would be followed prior to the implementation of a scheme (as listed in question above) and this includes consultation with those affected.
Physical impairment, e.g. mobility issues which mean using a wheelchair or crutches.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Sensory impairment, e.g. blind/having a serious visual impairment, deaf/having a serious hearing impairment.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Mental health condition, e.g. depression or schizophrenia.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Learning disability/difficulty, e.g. Down's syndrome or dyslexia, or cognitive impairment such as autistic spectrum disorder.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Long-standing illness or health condition, e.g. cancer, HIV, diabetes, chronic heart disease or epilepsy.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Other health problems or impairments.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Older People	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Children and Young People	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Faith Groups	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Pregnancy & Maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Marriage & Civil Partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

8. If you have indicated that there is a negative impact on any group, is that impact:

Legal? Yes No
Intended? Yes No
Level of impact High Low

No negative impact has been identified:

9. Could you minimise or remove any negative impact - how?

Charges would be required to be made in order to allow the Council to recoup ongoing administrative and enforcement costs. It should be noted that the Council would bear the costs associated with setting up residents parking schemes. Disabled people in possession of a 'blue badge' are clearly defined within the policy.

10. Could you improve a positive impact of the Function - how?

As and when any residents parking schemes are introduced they would only involve alterations to Traffic Regulation Orders which would apply equally to all people. The policy ensures that blue badge holders will not be charged for permits and that the allocation of permits to disabled residents does not count towards the total number of permits permitted per household. This is in view of how important easy access to transport is for disabled people.

11. If there is no evidence that the Function promotes equality of opportunity or improved relations, could it be adapted so that it does - how? (

N/A

12. Any other relevant notes:

None.

13. What consultation has been conducted with groups and individuals from groups likely to be affected as well as staff, and what evidence has this provided about equalities impact?

The policy and procedure is in line with the objectives of the Joint Local Transport Plan 3 (JLTP3) which has been adopted by the four West of England Local Authorities. As part of the production of the JLTP3, extensive consultation was undertaken and an EqIAA was conducted which was taken into consideration when finalising the document. That EqIAA is available to view here:

<http://travelplus.org.uk/media/188244/eqia%20-%20final%20report.pdf>

This EqIAA was produced as part of the Strategic Environmental Assessment of the JLTP3 which was subject to public consultation.

Informal consultation has taken place on the proposed residents parking policy and procedure to seek the views of disabled people through the umbrella organisation The Disability Equality Network. The summary of their response is as follows:

The DEN is well aware that in some parts of South Gloucestershire there is acute pressure on parking and that this can give rise to tension in the communities affected as well as making it difficult to use both the roads and the pavements. This can cause particular difficulties for some disabled people. For some people it is vital that they are able to park close to their home because the distance they can walk is limited. For others an area of dense parking can result in pavements and dropped kerbs being obstructed by inconsiderately parked vehicles, and obscured visibility at road junctions which can particularly affect people with impaired sight.

In principle the DEN supports the implementation of Residents Parking Schemes where they are an appropriate and proportionate response to heavy demand for parking in an area. We are reassured that blue badge holders will be entitled to a free parking permit if they live in an area of residents parking.

We have some concerns about the implementation of residents parking schemes which we would like the Council to consider in developing this policy:

- 1. Not every person eligible for a Blue Badge holds one. The DEN would like to see that as part of the preparation for introducing a residents parking scheme residents who may be eligible to apply for a badge are reminded that they can do so and that assistance is offered to anyone who needs help completing the form. Age UK S Gloucestershire assist a number of older people to apply because the application form for a discretionary badge is complex. (It is simpler for those who have automatic entitlement because they receive the higher rate mobility component of Disability Living Allowance).*
- 2. Disabled people who live alone and do not have access to a car could be significantly disadvantaged if the introduction of a residents parking scheme makes it difficult for people to visit them. These visitors may be paid care staff who increasingly no longer work for the Council but for private and voluntary sector agencies. It is important that these workers are given permits to enable them to park in a residents parking area. In addition there will be friends, family members and volunteer befrienders who visit and ensure that vulnerable people do not become isolated. We suggest that a disabled person who would be eligible for a blue badge but does not need one as they have no access to a car and are largely housebound should be allocated a transferable permit to be displayed in the car of anyone visiting them.*
- 3. We also consider it important that where discretionary parking bays are provided for individual disabled people living in residents parking areas they are properly enforced. It is unrealistic to a disabled person to take on this role themselves as they may feel vulnerable.*

14. What relevant research (data, reports, expert opinion etc.) has been conducted and what evidence has this provided about equalities impact?

The policy and procedure is in line with the objectives of the Joint Local Transport Plan 3 (JLTP3) which has been adopted by the four West of England Local Authorities. As part of the production of the JLTP3, extensive consultation was undertaken and an EqIAA was conducted which was taken into consideration when finalising the document. That EqIAA is available to view here:

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Chapter 1 of the JLTP3's EqIAA sets out an analysis of the equalities-related social and economic characteristics of the West of England. This analysis informed the impact assessment, which informed the preparation of the JLTP3 which has in turn informed the selection of the schemes which are the subject of the bid.

Consideration of the introduction of a new policy and process has also taken account of household size because some groups may be more likely than others to live in households of higher numbers of individuals. The impact of this could potentially be a greater likelihood of being subject to the higher charge for second and third permits. The following research has been conducted in this respect:

Accommodation is defined as 'overcrowded' if it is one or two bedrooms below the 'bedroom standard' level. This is a convention that has been in used for several decades, based on pre-war environmental health standards. One bedroom is allocated to each co-habiting couple, each other person aged over 21, each pair aged 10-20 years of the same gender and each pair of children under 10 of either gender. Unpaired children, or individuals under 20, are allocated a separate bedroom (although they can be paired with another person aged under 20 of the same sex)⁵.

The most marked differences in levels of overcrowding are in terms of ethnicity...in Britain, just over 9% of all Asian (including Asian British) households are overcrowded relative to the bedroom standard, while almost 15% of all Black (including Black British) households are overcrowded against the standard. In contrast, fewer than 2% of all White British households are overcrowded... Just over 4% of Indian households are overcrowded, as are 15% of Pakistani households and 26% of all Bangladeshi households. Similarly 8% of Black Caribbean households and 21% of Black African households are overcrowded⁶.

This information provides an overview of the national picture, however, the following table shows information specifically relating to South Gloucestershire.

Ward name	Average household size (persons per household)	Non-White British Population
Almondsbury	2.6	2.7%
Bradley Stoke South	2.5	17.4%
Charfield	2.6	2.7%
Dodington	2.6	3.9%
Emersons Green	2.5	9.0%
Frampton Cotterell	2.5	4.2%
Ladden Brook	2.7	2.7%
Oldland Common	2.5	3.5%
Severn	2.5	3.6%
Stoke Gifford	2.5	12.9%
Winterbourne	2.5	7.2%
Yate North	2.5	5.4%
South Gloucestershire	2.4	8.1%

Source: Census 2011

⁵ Equality and Human Rights Commission, How fair is Britain?, Equality, Human Rights and Good Relations in 2010

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The table shows that the average household size in South Gloucestershire is 2.4 persons per household. Those Wards with a higher than average household size have been listed in the table. The table goes on to show the minority ethnic population of each Ward which allows for comparison against the South Gloucestershire average of 8.1% of the population being from a minority ethnic group. The table identifies three Wards which have a higher than average household size and a higher than average minority ethnic population. In particular, Bradley Stoke South and Stoke Gifford have a significantly higher number of people from minority ethnic backgrounds when compared to the South Gloucestershire population; however, at just 0.1 higher than average in terms of household size (i.e. 2.5 persons per household, compared to an average of 2.4 persons per household), it cannot be said that there is a disproportionately higher likelihood that people from minority ethnic backgrounds are living in households of significantly higher size and therefore would experience disadvantage due to a higher likelihood of being subject to higher second and third parking permit charges. This means that there has been no adverse impact identified in relation to Race in South Gloucestershire.

Informal consultation has taken place on the proposed residents parking policy and procedure to seek the views of disabled people through the umbrella organisation The Disability Equality Network. Their response is set out in section 13 above.

15. What contributions does your function/activity make towards promoting community cohesion?

The policy and procedure will ensure that there is a consistent and appropriate method for investigating solutions to perceived local on-street parking problems in residential areas which can have a negative impact on communities. Community cohesion will be promoted by the policy and procedure ensuring that the most appropriate solutions are implemented to alleviate parking problems.

SECTION 4 – OUTCOMES

16. The evidence that has been collected under Sections 1, 2 and 3 of this form will need to feed into the decision making process regarding changes to be implemented before any final decisions are taken. There are four possible outcomes of this EqIAA – indicate which outcome below with the reasons and justification for this.

Outcome	Your response	Reason(s) and Justification
Outcome 1: No major change required.	<input checked="" type="checkbox"/>	Although potential negative impacts have been identified, these are balanced by positive impacts associated with alleviating localised parking problems.
Outcome 2: Adjustments to remove barriers or to better promote equality have been identified.	<input type="checkbox"/>	
Outcome 3: Continue despite having identified potential for adverse impact or missed opportunities to promote equality.	<input type="checkbox"/>	
Outcome 4: Stop and rethink.	<input type="checkbox"/>	

17. List the actions you will take as a result of this EqIAA.

Residents parking schemes will be subject to South Gloucestershire Council's Consultation Procedure. This will be carried out in accordance with the Council's 'Consultation Framework' (which includes 'Customer Insight' equalities guidance).

SECTION 5 – EqIAA EVIDENCE

18. List and attach the evidence you have which shows how you have systematically considered equality impact.

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Informal consultation has taken place on the proposed residents parking policy and procedure to seek the views of disabled people through the umbrella organisation The Disability Equality Network. Their response is set out in section 13 above.

As and when requests to investigate perceived parking problems in residential areas are received, if a residents parking scheme appears to be a potential solution, the potential scheme would be subject to South Gloucestershire Council's Consultation Procedure. This will be carried out in accordance with the Council's 'Consultation Framework' (which includes 'Customer Insight' equalities guidance and monitors impacts in respect of protected characteristic groups as defined by the Equality Act 2010). This will ensure that the implementation of the policy is continually checked and monitored.