

Equality Analysis



Please refer to the guidance for carrying out Equality Impact Assessments is available on the intranet
Text in blue is intended to provide guidance – you can delete this from your final version.

What are the proposals being assessed?	A review of the charges levied by Parking Services for on street pay and display charges, off street pay and display charges and permit charges to help deliver key strategic council priorities including public health, air quality and sustainable transportation.
Which Department/ Division has the responsibility for this?	Parking Services, Environment and Regeneration

Stage 1: Overview

Name and job title of lead officer	Ben Stephens, Head of Parking
1. What are the aims, objectives and desired outcomes of your proposal? (Also explain proposals e.g. reduction/removal of service, deletion of posts, changing criteria etc)	The Council is being asked to consider its approach to future parking services in the context of the public health agenda, the shift to more active and sustainable transport modes, the impact of vehicle emissions, congestion and demand for kerbside space. The report sets out the justification for the recommended parking tariffs and charges with the aim to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.
1.1 About the proposed policy changes	<p>Purpose of the policy</p> <p>The purpose of the proposed policy is to adjust Parking tariffs and charges. The aim is to adjust driver behaviour and ensure that Merton provides a modern, efficient, healthy, and environmentally sustainable transport environment for Merton residents, visitors and businesses, through an evidence based approach.</p>

Who the policy is intended to benefit

The policy is intended to benefit all Merton residents, visitors and businesses, by supporting a shift to more active and sustainable modes of transport (such as walking, cycling and public transport) and reducing the impact of vehicle emissions and congestion on air quality.

1. Reduced congestion
2. Improved road safety
3. Improved air quality
4. Ensurance of good access and accessibility
5. Promotion of the local economy
6. Maximisation of the productive use of land resource
7. Promotion of health and wellbeing through travel choice
8. Providing funding for parking and wider transport scheme improvements

The proposed policy changes clearly contribute to the Council's corporate priorities.

Why the policy is needed

There has been no increase in the cost of parking, either on-street, off-street or in relation to the cost of the varying types of permits issued by Parking Services for 9 years. As a result of the high demand for parking in town centres in conjunction with the high levels of air pollution, it has become imperative that a review is undertaken of the charges levied with the aim of rationalising the cost of parking, while also encouraging residents and visitors to use more sustainable forms of transport.

2. How does this contribute to the council's corporate priorities?

Merton's Health and Wellbeing Strategy 2019-24

1. **A key theme for the Health and Wellbeing Strategy, which is currently being refreshed to cover 2019-24 (led by the Health and Wellbeing Board), is Healthy Place.**

Merton residents are aware of the importance of Healthy Place. A recent Healthy Places Survey led by the Council's Environment and Regeneration department¹ revealed the top priorities identified by Merton residents for creating healthy places in Merton include air quality, green infrastructure and open spaces including parks, and good cycling and walking routes, paths and lanes.

¹ Survey data available here: <https://www.merton.gov.uk/assets/Documents/Healthy%20Places%20survey%20responses%20Jan18.pdf>

2. Better air quality: Improving air quality is important because 6.5% of mortality in Merton is attributable to poor air quality.²

By helping to reduce vehicle emissions and supporting the shift to sustainable and active modes of transport, parking policy can improve air quality, which in turn will have positive benefits for people's health.

There is ample evidence on the impact of air quality on health. Over time, poor air quality is associated with a range of mortality and morbidity outcomes. Exposure to poor air quality is associated with a range of cardiovascular, respiratory and cerebrovascular health effects³ and recent evidence suggests there may be a link between air pollution and a person being at increased risk of developing dementia.⁴ Evidence suggests a link between exposure to air pollution and cognitive performance.^{5 6} In Scotland a recent study found spikes in poor air quality to be associated with increased hospital admissions and GP surgery visits.⁷

3. Safer, less congested roads:

In 2016 there were 579 people slightly injured and 44 people killed or seriously injured due to road traffic accidents in Merton.⁸ By reducing congestion, incentivising people to use sustainable modes of transport, and using the revenue raised through parking charges to improve transport infrastructure, parking charges can help to reduce the number of road traffic accidents in Merton, leading to fewer deaths from road traffic accidents and a reduction in hospital-related admissions from road traffic injuries.

The INRIX 2017 Global Traffic Scorecard ranked the UK as the 10th most congested country in the world and the 3rd most congested in Europe. London has remained the UK's most congested city for the 10th

² Data available here:

<https://fingertips.phe.org.uk/search/air%20pollution#page/0/gid/1/pat/6/par/E12000007/ati/101/are/E09000002/iid/30101/age/230/sex/4>

³ WHO, *Health risks of air pollution in Europe-HRAPIE project. New emerging risks to health from air pollution-results from the survey of experts*. 2013. Available here:

http://www.euro.who.int/__data/assets/pdf_file/0017/234026/e96933.pdf?ua=1

⁴ Carey IM, Anderson HR, Atkinson RW, et al. *Are noise and air pollution related to the incidence of dementia? A cohort study in London, England*. *BMJ Open* 2018;8:e022404. doi: 10.1136/bmjopen-2018-022404. Available here: <https://bmjopen.bmj.com/content/8/9/e022404>

⁵ Zhang et al. *The impact of air pollution on cognitive performance*. *Proceedings of the National Academy of Sciences* Sep 2018, 115 (37). Available here: <http://www.pnas.org/content/115/37/9193>

⁶ Cipriani. G et al. *Danger in the Air: Air Pollution and Cognitive Dysfunction*. *American Journal of Alzheimer's Disease and other Dementias*. Volume: 33 issue: 6, page(s): 333-341 . Sept 2018. Available here: https://journals.sagepub.com/doi/full/10.1177/1533317518777859?url_ver=Z39.88-2003&rfr_id=ori%3Arid%3Acrossref.org&rfr_dat=cr_pub%3Dpubmed

⁷ Goeminne. P et al. *The impact of acute air pollution fluctuations on bronchiectasis pulmonary exacerbation: a case-crossover analysis*. *European Respiratory Journal* Jul 2018, 52 (1) 1702557; DOI: 10.1183/13993003.02557-2017. Available here: <http://erj.ersjournals.com/content/52/1/1702557>

⁸ Travel in London 10 supplementary Information

year in a row, ranked second in Europe after Moscow.⁹ Demand-based parking charges for on street parking can help reduce the congestion caused by drivers cruising the streets in search of a place to park. This is also good for the economy- it has been estimated that motorists in London spend around 74 hours per year in congestion at peak times, costing them individually £2, 430 per year, or £9.5 billion across the city.¹⁰

4. Improved physical and mental health of Merton residents:

In Merton, levels of physical activity has dropped by two percentage points in two years.¹¹ Furthermore based on Department for Transport statistics for 2016/17 the proportion of adults doing any walking or cycling once a week is 77.9% down from 81.5% for 2015/16.

By supporting the shift to more sustainable and active modes of transport, improving air quality and generally making streets more pleasant places for Merton residents to spend their time, parking policy can help increase the physical and mental health of Merton residents. This can help reduce levels of childhood and adult overweight and obesity; a key issue in Merton. In Merton, one in five children entering reception are overweight or obese and this increases to one in three children leaving primary school in Year 6 who are overweight or obese.

5. Healthy places:

The 'healthy streets' approach defines a healthy street as one with: things to see and do; places to stop and rest; shade and shelter; clean air; and pedestrians from all walks of life. It must be easy to cross; and feel safe, relaxing and not too noisy. Put simply, it needs to be an environment in which people choose to walk and cycle. Action against these indicators ultimately improves health, and parking policy has a role to play for example, by helping improve air quality, and incentivising people to walk, cycle and use public transport.

6. Example of healthy places and the role parking services can play:

Parking Services are already working jointly with Public Health on the School Neighbourhood Approach Pilot (SNAP). This pilot recognises that there isn't one solution to complex challenges and that many different government departments hold the levers to improving the urban environment and therefore the public's health. The pilot involves identifying the levers the Council has to improve the urban environment in the 400 metres around a school, and then working with a selected school to take action on issues that

⁹ <http://inrix.com/scorecard/>

¹⁰ <http://inrix.com/press-releases/scorecard-2017-uk/>

¹¹ Levels of physical activity has dropped from 38 percent of residents doing at least two x 10 minutes of active travel a day in 2013/14 to 2015/16 to 36 percent in 2014/15 to 2016/17.

matter to them, such as air quality and an obesogenic environment, with the ultimate aim of reducing health inequalities.

We need to consider what we can do as a borough to ‘make the healthy choice the easy choice’, to improve public services and encourage residents to choose active travel options more often, and to reduce congestion and improve air quality.

MERTON AIR QUALITY ACTION PLAN 2018-2023

Air pollution is recognised as a major contributor to poor health with more than 9000 premature deaths attributed to poor air quality in London. Air pollution is associated with a number of adverse health impacts: it is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality are often less affluent.

Air quality has been identified as a priority both nationally and within London, where pollution levels continue to exceed both EU limit values and UK air quality standards. Pollution concentrations in Merton have historically and continue to breach the legally binding air quality limits for both Nitrogen Dioxide (NO₂) and Particulate Matter (PM10). The air quality monitoring network run by Merton has shown that the UK annual mean NO₂ objective (40µg/m³) continues to be breached at a number of locations across the borough. In some locations the NO₂ concentration is also in excess of the UK 1-hour air quality objective (60µg/m³) which indicates a risk not only to people living in that area but also for those working or visiting the area.

AQMAs and Focus Areas

In Merton an Air Quality Management Area (AQMA) has been declared for the whole borough. The AQMA has been declared for the following pollutants:

Nitrogen Dioxide: we are failing to meet the EU annual average limit for this pollutant at some of our monitoring stations and modelling indicates it is being breached at a number of other locations. We may also be breaching the UK 1-hour Air Quality Objective based on measured concentration for NO₂ being in excess of 60µg/m³ at some locations within the borough.

Particulate Matter (PM10) – whilst monitoring data from the automatic monitoring station at South

	<p>Wimbledon indicates we are complying with the UK Objectives and EU Limits, the wider modelling data indicates that we are likely to be breaching the 24-hour and annual mean PM10 Objectives at a number of locations across the borough. We are also exceeding World Health Organisation air quality guideline for this pollutant, and we have a formal responsibility to work towards reductions of PM2.5.</p> <p>An Air Quality Focus Area is a location that has been identified as having high levels of pollution and human exposure. There are four focus areas in the borough. These are in the main centres of Mitcham, Morden, Raynes Park and Wimbledon.</p> <p>The London Borough of Merton is committed to reducing the exposure of people in Merton to poor air quality. The updated Air Quality Action Plan identifies Merton Council’s priorities for tackling air quality over the next 5 years and is supported by the departmental Heads of Service for Environmental Health, Transport, and Planning; the Director of Public Health and Cabinet members.</p> <p>Merton’s Air Quality Action Plan 2018-2023 strongly supported by Members is a key policy document which clearly sets out the links between vehicle use and air quality in the Borough. Within the plan there is a specific point number 32 which states, Review the impact of our diesel levy* and consider a review of parking and charges to help reduce combustion engine vehicle use and the consequent emissions. <i>*Note: The Sustainable Communities and Transport Overview and Scrutiny Panel to conduct pre-decision scrutiny on the scope of any reviews on parking levies.</i></p>				
<p>Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc.</p>	<p>Any change to the cost of permits and pay and display charges will affect all car owners who reside within existing and future Controlled Parking Zones (CPZ) as well as all motorists commuting to the boroughs town centres, whether as part of their daily commute, or to access shops and entertainment</p>				
<p>3.1 Data on Protected Characteristics in Merton</p>	<p>Population demographics</p> <p>The total population in 2018 was 209,420.</p> <table border="1" data-bbox="378 1421 1197 1466"> <thead> <tr> <th data-bbox="378 1421 745 1466">Age</th> <th data-bbox="745 1421 1197 1466">Percentage of total population</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Age	Percentage of total population		
Age	Percentage of total population				

0-4	7.4%
5-17	15.7%
18-64	64.5%
65-84	10.7%
85+	1.7%

Source: GLA Housing led projection, data from 2016 SHLAA

Disability

From the 2011 Census, 12.6% (25,230 people) of Merton's population had a long-term health problem or disability.

Physical disability

Level of disability	Age	2018	2025	Percentage change
Moderate	18-64	10,120 (7.3%)	10,960 (7.5%)	8% increase
Serious	18-64	2,870 (2.1%)	3,181 (2.2%)	11% increase

Visual impairment

Level of disability	Age	2018	2025	Percentage change
Moderate or severe	65+	2,290 (8.7%)	2,648 (8.9%)	16% increase
Serious	18-64	90 (0.1%)	95 (-.1%)	6% increase

Hearing loss

Level of disability	Age	2018	2025	Percentage change
Some hearing loss	18-64	11,540 (8.3%)	12,970 (8.9%)	12% increase

Severe hearing loss	18-64	761 (0.5%)	837 (0.6%)	10% increase
Some hearing loss	65+	15,760 (60.2%)	18,080 (60.7%)	15% increase
Severe hearing loss	65+	2,073 (7.9%)	2,372 (8.0%)	14% increase

Learning disability

Age	2018	2025	Percentage change
18-64	3,390 (0.4%)	3,550 (0.4%)	5% increase
65+	545 (2.1%)	621 (2.1%)	14% increase

Daily activities, 65 and over

Over half of people in Merton aged 65 and over are not limited in daily activities. Merton shows a higher score for daily activities not limited than London (48%) and England (48%).

Level of limitation (daily activities, 65 years and over))	Percentage
Not limited	50%
Limited a little	27%
Limited a lot	23%

Source: The 9 Protected Characteristics, Merton. Available from: <https://www2.merton.gov.uk/9%20PC%20July%202018%20Final.pdf>

Sex

Age	Female	Male
0-4	106,045 (51%)	103,370 (49%)
5-17	16,077 (49%)	16,733 (51%)
18-64	68,266 (50.5%)	66,914 (49.5%)
65-84	11,840 (53%)	10,500 (47%)

85+

2,287 (63%)

1,343 (37%)

Source: The 9 Protected Characteristics, Merton. Available from: <https://www2.merton.gov.uk/9%20PC%20July%202018%20Final.pdf>

Race and ethnicity

The 2011 Census identified that:

- 48.4% of the population are white British, compared to 64% in 2001.
- 35% of Merton's population is from a Black, Asian and Minority Ethnic (BAME) groups (this includes non-white British).

The findings of the 2011 when compared to 2001 Census identified:

- -10% decrease in the overall White population
- -6% increase in the Asian,
- -3% increase in the Black population
- -2% increase in Mixed groups

According to the Greater London Authority (GLA): 2015 round ethnic group projections there are currently 77,740 people (37% of Merton's population) from a BAME group. This is projected to increase by 2025 to 84,250 people (+1%).

Religion or belief

Religion or belief	% of total population
Christian	56.1
Muslim	8.1
Hindu	6.1
Buddhists	0.9
Jewish	0.4
Sikh	0.2
Not religious	20.6

Source: GLA 2016-based demographic projections round, housing led model

Sexual orientation

From the 2014 Integrated Household Survey, 2.6% of London’s population answered Lesbian, Gay, Bisexual or Transgender as their sexual identity. This would equate to approximately 5500 people in Merton.

Socio-economic status

The 2015 IMD (Index of Multiple Deprivation) score shows that Merton as a whole is less deprived (14.9) compared to London (23.9) and England (21.8). However, east Merton has an average IMD score of 21.1 compared to west Merton which is 8.2.

The table below shows the wards in Merton split by deprivation decile, based on the 2015 IMD deciles.

Wards in Merton split by deprivation decile

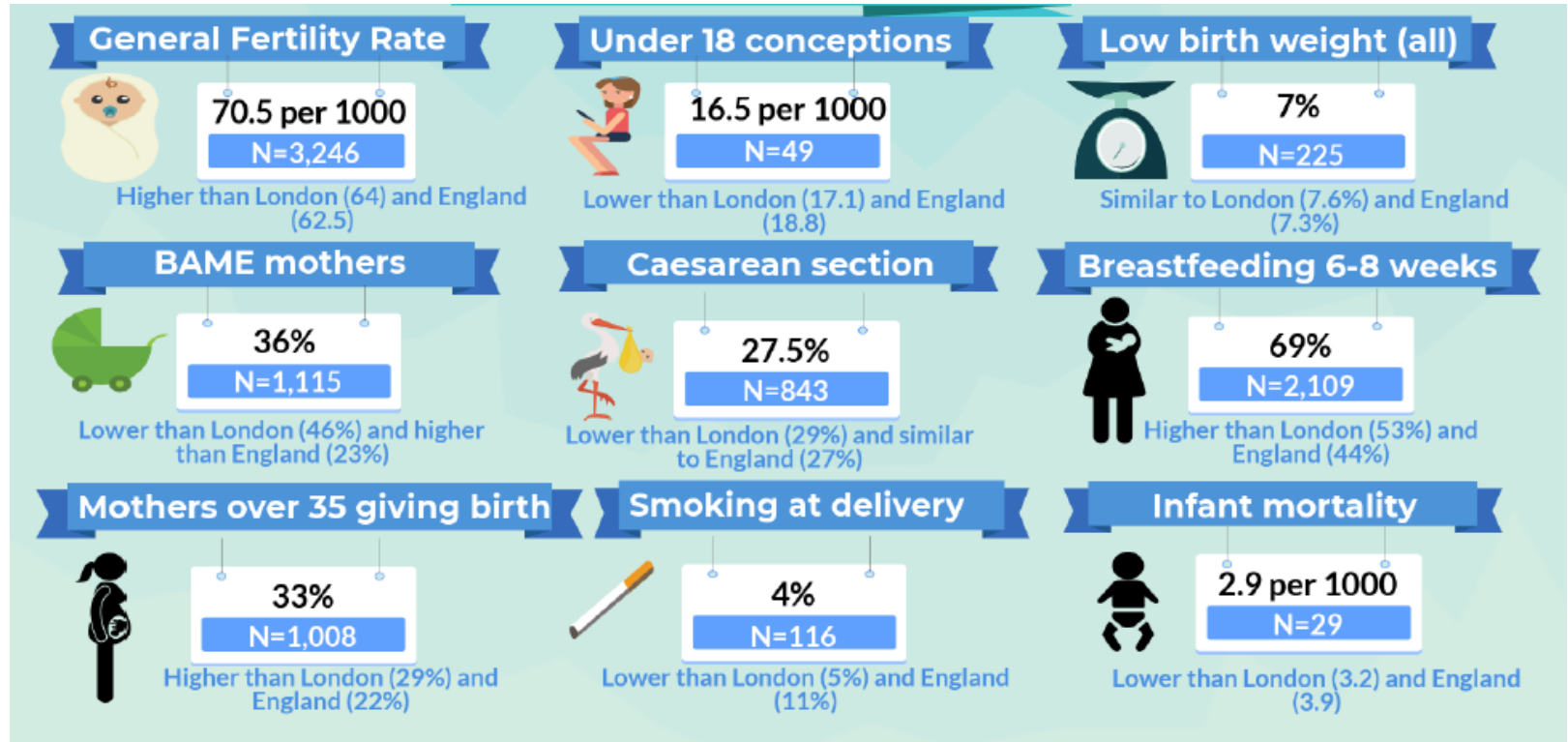
Decile	Ward name	Locality
1	-	-
2	-	-
3	Cricket Green	East
4	Figge's Marsh	East
	Lavender Fields	East
	Pollards Hill	East
	Ravensbury	East
	St Helier	East
5	Longthornton	East
6	Colliers Wood	East
	Graveney	East
7	Abbey	East
8	Lower Morden	West
	Raynes Park	West
	Trinity	West
	West Barnes	West
9	Cannon Hill	West
	Dundonald	West
	Hillside	West
	Merton Park	West
	Wimbledon Park	West
10	Village	West

30% Most Deprived

30% Least Deprived

Pregnancy and maternity

The following infographics show data on pregnancy and maternity in Merton.



Source: The 9 Protected Characteristics, Merton. Available from: <https://www2.merton.gov.uk/9%20PC%20July%202018%20Final.pdf>

Marriage and civil partnership

2011 Census data shows us that a majority of Merton's population were either single (40%, lower than London at 44%) or married (45%, higher than London at 40%). By 2018, the number of Civil Partnerships is expected to have risen considerably, however the exact numbers will not be shown until the 2021 Census.

Status	Number	Percentage of total population
Married	72,157	45%

	Single	64,689	40%
	Divorced	11,083	7%
	Widowed	8,187	5%
	Separated	4,173	2%
	Civil Partnership	551	1%

<p>4. Is the responsibility shared with another department, authority or organisation? If so, who are the partners and who has overall responsibility?</p>	<p>The management of on and off street parking is the responsibility of Parking Services, and actions taken by Parking services contribute towards the Air Quality Action Plan (AQAP) which is the responsibility of the Regulatory Service Partnership team.</p>
--	---

Stage 2: Collecting evidence/data

<p>5) What evidence has been considered as part of this assessment?</p>	<p>Background to proposals and evidence that has been considered as part of this assessment</p> <p>The Council acknowledges that convenient parking should be provided for residents to enable them to park near their homes, where practicable, and parking provision is also necessary to meet the needs of people who have no other alternative other than to use their vehicle e.g. individuals with disabilities. There are also areas where public transport is either not available or not very convenient.</p> <p>Local authorities are not permitted to use parking charges solely to raise income. When setting charges, a local authority must instead focus on how the charges will contribute to delivering the Council's traffic management and key sustainability objectives.</p> <p>The November Cabinet report set out in detail the traffic management approach to parking charges, specifically the contribution appropriate tariffs can make in contributing to the objectives set out in the Public Health Agenda, and Air Quality Action Plan. Mayor Transport Plan and the council Local Implementation Plan.</p> <p>Building on these principles, a number of key factors were considered in the review of on and off-street parking and permits, which included:</p> <p>(i) Ease of access to public transport:</p>
---	---

(ii) Air Quality
 (iii) Areas of high congestion
 (iv) Enforcement requirements

The review also considered the relative cost of owning a car and also transport cost. A recent RAC survey set out cost of car ownership. There are a number of instances where charges have been reduced or removed totally, particularly in respect of Electric Vehicles, and evening parking when demand in some car parks is low. But in the context of owning and running a car in London, the challenges facing London and benchmarking data the charges remain affordable, even if some charges in isolation may be seen as significant.

There is a significant difference in transport infrastructure and accessibility dependent on where a resident lives within the Borough. For example Wimbledon is considered to be better served than Colliers Wood and South Wimbledon, which in turn is better served than for example in Mitcham. This is presented in the form of a 'Public Transport Accessibility Levels' as set out by TfL and formed part of the review.

It is therefore easier in principle for a person living in Wimbledon Town Centre to use alternative sustainable or active modes of transport, compared to residents in the east of the borough, where the 'need' to own a car could be argued as being higher. It is of course accepted that in some cases cars are needed for special purposes, particularly those with physical mobility issues. But in a high number of cases using public transport or active transport is a very viable option, which drivers 'choose' not to use.

6.1 Overview of proposals

The policy proposals

Below are the proposed parking policy changes that have emerged, followed by an overview of the possible positive and negative impacts that these proposals could have on equality groups. For more detailed information on these policy proposals, see the November 2018 Cabinet paper 'Public health, air quality and sustainable transport-a strategic approach to parking charges'.

1) On street tariffs:

It is recommended on street parking is categorised into 4 broad zones and that the tariffs are as follows:

On-street pay & display	Per Hour
Zone 1	£4.50

Wimbledon town Centre	
Zone 2 Wimbledon Village, Wimbledon Park, South Wimbledon Raynes Park. Colliers Wood,	£3.00
Zone 3 Mitcham, Morden and other areas not specified.	£1.50
Zone 1a Wimbledon Common	£1.50

For more information on ease of access to public transport, air quality indicators and parking demand and space availability, as well as more information about the zones the tariffs refer to, see the November Cabinet paper '*Public health, air quality and sustainable transport-a strategic approach to parking charges*', from page 23.

2) Off street (car park) tariffs:

It is recommended (for council owned car parks only) that the following tariffs are applied:

CAR PARK (Inclusive of VAT).	Hourly rate/flat fee	Proposed hourly rate/flat fee
<u>WIMBLEDON</u>		
Broadway	£1.00	£2.00
Hartfield Road	£1.50	£2.00
Queens Road	£1.00	£1.50
St Georges Road	£1.40	£1.50
<u>RAYNES PARK</u>		
Coombe Lane	£0.30	£0.60*
<u>MORDEN</u>		
Kenley Road (flat fee)	£3.50	£7.50
Morden Park (hourly)	£0.40	£0.60

Morden Park (flat fee)	£5.00	£7.50
Peel House Lower	£0.40	£0.60
Peel House Upper (flat fee)	£5.00	£7.50
Peel House Upper (hourly)	£0.50	£0.60
York Close (flat fee)	£5.00	£7.50
York Close (hourly)	£1.00	£1.20
<u>MITCHAM</u>		
Elm Nursery	£0.50	£0.60
Raleigh Gardens	£0.50	£0.60
St Marks Road	£0.40	£0.60
Sibthorpe Road	£0.70	£0.90

3) Car park season tickets (commuter with onward journey-rail heading)

It is recommended there is a clear link between the day tariff and a season ticket price. It is recommended the cost of the season ticket is based on the proposed day charge for each car pack x 250 (working days in a year). It is recommended the following discounts should be applied

- i) 10% discount for a customer purchasing a 3 month permit
- ii) 20% discount for 6 months and
- iii) 30% discount for a 12 month season ticket

An example of the revised cost would be in Morden Town centre a commuter with an onward journey would be required to pay £5.25 per day up from the current £1.78. As referenced in the table below, a local resident or local worker would in the revived charging structure be required to pay the equivalent of £2.80 per day if they bought a 12 month season ticket in a Morden car park:

Area	Current price	commuter with onward journey – rail heading
Mitcham		
12 months with 30% discount	£300	£525
6 months with 20% discount	£150	£300
1 month with 10% discount	£25	£62.50

Morden		
12 months with 30% discount	£445	£1,313
6 months with 20% discount	£222.50	£750
3 months with 10% discount	£111.25	£422
Queens Road (Wimbledon)		
6 months to match competition	£480	£5,00
3 months to match competition	£240	£250

It is recommended the principle of free parking in our car parks is also offered to 'fully' electric vehicles on season ticket sales.

It is recommended the diesel surcharge should be applied to customers applying for a season ticket in the same way as a resident purchasing a permit for a CPZ zone.

4) Car park season tickets for residents and local workers

It is recommended that for Merton residents who use our car parks and customers who have a primary place of work within the borough the following discounts and tariffs will be applied:

- i) 20% discount for a customer purchasing a 3 month season ticket
- ii) 40% discount for 6 months and
- iii) 60% for a 12 month season ticket

Area	Current price	Local price Residents/local workers
Mitcham		
12 months with 60% discount	£300	£300
6 months with 40% discount	£150	£225
1 month with 20% discount	£25	£62.50
Morden		
12 months with c. 60% discount	£445	£700
6 months with c. 40% discount	£222.50	£500

3 months with 20% discount	£111.25	£375
Queens Road (Wimbledon)*		
6 months (based on local competition)	£480	£500
3 months (based on local competition)	£240	£250

5) Resident parking permits

The following charges have been recommended:

Zone duration	Tier 1 zones Wimbledon	Tier 2 zones Part Colliers Wood/ South Wimbledon/ Raynes Park/ Morden	Tier 3 zones Mitcham/Haydons Rd/ Part Colliers Wood.	100% electric vehicles All zones
Long (12 to 14.5 hrs)	£150	£130	£90	£20
Medium (6 to 10 hrs)	£120	£110	£80	£20
Short (1 to 4 hrs)	£110	£100	£70	£20

Please note the above table is a summary- for full details see the November Cabinet paper '*Public health, air quality and sustainable transport-a strategic approach to parking charges*'

6) Virtual permits and visitor vouchers

The following charges have been recommended:

	Half day	Full day
Tier		

Tier 1 zones	£3.50	£5
Tier 2 zones	£3	£4
Tier 3 zones	£2	£3

Stage 3: Assessing impact and analysis

6) Possible impacts of policy proposals

Page 618

The policy proposals above could have positive impacts on people from lower socio-economic groups, in relation to a key challenge in Merton; childhood obesity. In Merton, 4,500 primary school children (aged 4-11) are estimated to be overweight or obese (excess weight). One in 5 children entering reception are overweight or obese and this increases to 1 in 3 children leaving primary school in Year 6 who are overweight or obese. The gap in levels of obesity between the east and the west of the borough is currently 10% (2013/14-2015/16), and increasing. This significant health inequality impacts children's health and potentially their life chances. By supporting the shift towards more sustainable modes of transport, these policy proposals can help increase the physical and mental health of Merton residents.

Furthermore, Merton along with most London Boroughs is currently failing its annual legal air quality targets for both NO2 and Particulates (PMs), this problem is most severe around the major transport routes. There is emerging evidence that schools in London which are worst affected by air pollution are in the most deprived areas, meaning that poor children and their families are exposed to multiple health risks. By helping to reduce vehicle emissions and supporting the shift to sustainable and active modes of transport, parking policy can improve air quality, which in turn will have positive benefits for people's health, including vulnerable groups such as the very young and the elderly, who are most negatively affected by poor air quality. For example, recent research has found that the pollutant exposure of babies in prams can exceed that of adults by up to 60%, due to the fact that their breathing height is where concentrations of pollutants are usually highest.¹²

¹² Sharma, A., Kumar, P. (2018) A review of factors surrounding the air pollution exposure to in-pram babies and mitigation strategies. (Environment International, Vol 120, pp 262-278)

However, despite positive impacts of these proposed policy changes, it is recognised that any increase in parking charges has the potential to negatively impact those on lower incomes,. However the Council feels a negative impact will be mitigated by recognising that the poorer areas of the borough do not have as good transport links as the more affluent areas of the borough, and in recognition of this, ensuring that any increases in parking charges in these areas would be less.

These policy proposals could have a negative impact on people with disabilities, who tend also to be on lower incomes. However, the Council feels any negative impacts will be mitigated by the Blue Badge scheme for disabled persons, providing them with free parking at on street locations. Blue Badge holders also receive 1 free annual visitors permit for their guests and carers to use.

6.1 From the evidence you have considered, what areas of concern have you identified regarding the potential negative and positive impact on one or more protected characteristics (equality groups)?

Protected characteristic (equality group)	Tick which applies		Tick which applies		Reason Briefly explain what positive or negative impact has been identified
	Positive impact		Potential negative impact		
	Yes	No	Yes	No	
Age	X				Positive Impact : Improved air quality will positively impact on all equality groups.
Disability	X		X		Positive Impact : Improved air quality will positively impact on all equality groups. Negative Impact : Any increase in parking charges has the potential to negatively impact on those with a disability as they are more likely to have less income. However, any increase in charges is offset by eligibility for a Blue Badge which provides free on street parking at many locations, including on single and double yellow lines.
Gender Reassignment	X				Positive Impact : Improved air quality will positively impact on all equality groups.
Marriage and Civil Partnership	X				Positive Impact : Improved air quality will positively impact on all equality groups.
Pregnancy and Maternity	X				Positive Impact : Improved air quality will positively impact on all equality groups.
Race	X				Positive Impact : Improved air quality will positively impact on all equality groups.
Religion/ belief	X				Positive Impact : Improved air quality will positively impact on all equality groups.
Sex (Gender)	X				Positive Impact : Improved air quality will positively impact on all equality groups.
Sexual orientation	X				Positive Impact : Improved air quality will positively impact on all equality groups.
Socio-economic status	X		X		Positive Impact : Improved air quality will positively impact on all equality groups. Negative Impact : Any increase in parking charges has the potential to negatively impact on those on lower incomes, however in mitigation, it is recognised that the poorer areas of the borough do not have as good transport links as the more affluent areas of the borough, and in recognition of this, any increases in these areas would be less.

Page 6 of 10

7. If you have identified a negative impact, how do you plan to mitigate it?

Disability - Negative Impact - Blue Badge holders are allowed to park for free on-street, providing their blue badge is on display, and resident blue badge holders are issued with a free annual visitors permit for use by their visitors and carers.

Socio-economic status – Negative Impact - There is a significant difference in transport infrastructure and accessibility dependent on where a resident lives within the Borough. For example Wimbledon is considered to be better served than, Colliers Wood and South Wimbledon, which in turn is better served than for example in Mitcham. As such it is easier in principle for a person living in areas of very good transport to use alternative sustainable modes of transport, compared to other areas where accessibility is less good, where the ‘need’ to own a car could be argued as being higher. The cost of a first permit issued to an address in Mitcham, Haydons Road or Raynes Park would range from £70 - £90 (excluding the diesel levy), compared to the cost of a first permit issued to an address in Wimbledon would range from £110 - £150 (excluding the Diesel levy). The current charge for the first permit in a household is £65.

Stage 4: Conclusion of the Equality Analysis

8. Which of the following statements best describe the outcome of the EA (Tick one box only)

Page
621

Please refer to the guidance for carrying out Equality Impact Assessments is available on the intranet for further information about these outcomes and what they mean for your proposal

Outcome 1 – The EA has not identified any potential for discrimination or negative impact and all opportunities to promote equality are being addressed. **No changes are required.**

Outcome 2 – The EA has identified adjustments to remove negative impact or to better promote equality. **Actions you propose to take to do this should be included in the Action Plan.**

Outcome 3 – The EA has identified some potential for negative impact or some missed opportunities to promote equality and it may not be possible to mitigate this fully. **If you propose to continue with proposals you must include the justification for this in Section 10 below, and include actions you propose to take to remove negative impact or to better promote equality in the Action Plan. You must ensure that your proposed action is in line with the PSED to have ‘due regard’ and you are advised to seek Legal Advice.**

Outcome 4 – The EA shows actual or potential unlawful discrimination. **Stop and rethink your proposals.**

Stage 5: Improvement Action Pan

9. Equality Analysis Improvement Action Plan template – Making adjustments for negative impact

This action plan should be completed after the analysis and should outline action(s) to be taken to mitigate the potential negative impact identified (expanding on information provided in Section 7 above).

Negative impact/ gap in information identified in the Equality Analysis	Action required to mitigate	How will you know this is achieved? e.g. performance measure/ target)	By when	Existing or additional resources?	Lead Officer	Action added to divisional/ team plan?	
Page 622	Economic – Disability	Any rise in permit prices is mitigated by the Blue Badge scheme for disabled persons, providing them with free parking at on street locations. Blue Badge holders also receive 1 free annual visitors permit for their guests and carers to use.	Customer feedback	01/10/2018	Existing	Ben Stephens	
	Economic – Socio Economic	While there will be an increase in the cost of permits issued to residents in the less advantaged areas of the borough, those residents in the poorest areas will pay less for their permits in comparison to residents in more advantaged areas with better transport links	Customer Feedback	01/04/2018	Existing	Ben Stephens	

Note that the full impact of the decision may only be known after the proposals have been implemented; therefore it is important the effective monitoring is in place to assess the impact.

Stage 6: Reporting outcomes

10. Summary of the equality analysis

This section can also be used in your decision making reports (CMT/Cabinet/etc) but you must also attach the assessment to the report, or provide a hyperlink

This Equality Analysis has resulted in an Outcome **2** Assessment

- There has been no increase in the cost of parking, either on or off street in the last 9 years. As a result of recent government findings relating to air pollution and the negative impact air pollution has on people's health, it is incumbent upon enforcing authorities to take steps to encourage residents and businesses to seek to utilize more sustainable forms of transport, and to encourage residents and businesses to choose less polluting
- Enforcing authorities have very few means by which they can influence a resident's choice of travel, however, the pricing structure of permits is one means by which an authority can influence this.
- While an increase in the cost of on and off street parking and permits could impact economically on the most disadvantaged residents within the borough, the proposal to band the cost of permits, offering a lower price to those living in the most disadvantaged areas of the borough, would mitigate an impact on the required price increase to these residents.

Stage 7: Sign off by Director/ Head of Service

Assessment completed by	Add name/ job title	Signature:	Date:
Improvement action plan signed off by Director/ Head of Service	Add name/ job title	Signature:	Date: