

Equality Analysis



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

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<p>What are the proposals being assessed?</p>	<p>Saving title – Diesel levy on Pay and Display parking</p> <p>Charging a diesel ‘levy’ for all on and off street parking incidents would nudge owners of diesel cars way from owning a diesel car and this EA assesses the impact on service users.</p> <p>To facilitate this change 100 new machines are required which can charge based on vehicle type. The plan is to remove all existing machines circa 450, land insert 100 new machines, These 100 machines account 80% of all transactions. Currently 2.3 m transactions – c £4.6 m per annum</p> <p>This assessment considers, 1) the effect of an increased charge for diesel car owners and 2) the payment methods at location where a machine is no longer an alternative and 3) in respect of the 100 new machines the impact for card only or card and cash.</p> <p>Ease of Implementation Any of the above changes will require a consultation process completed before introduction.</p>
<p>Which Department/ Division has the responsibility for this?</p>	<p>Parking Services, Environment and Regeneration</p>

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.)	<p>In setting out its measures of success, the on/off street diesel levy surcharge aims to reduce the number of diesel cars owned within the borough. Local authorities are not permitted to use parking charges solely to raise income. When setting charges, we must instead focus on how the charges will contribute to delivering the Council's traffic management and other policy objectives.</p> <p>Merton wishes to ensure that the highest priority is given, to its responsibilities to deliver cleaner local air at a time when the current situation has been described as a global public health emergency. We are delivering a new Air Quality Action Plan that is ambitious in its aims and already demonstrates that we as an authority will use all of the powers available to us, not only to challenge and tackle this problem; but also to work towards delivering our legal responsibilities to protect the public.</p> <p>The council recognises the part that it has to play, in developing and delivering a framework to tackle air quality, demand for parking, and congestion in the borough. It does not stand alone on these issues. All of the other London boroughs are seeking to implement new parking policies to tackle similar problems.</p> <p>There are very few direct levers available to stimulate a change in driver behaviour, and the council believes that the rationale for setting the new parking charges is about giving people the right nudge and opportunity to make different choices.</p> <p>Members are requested to exercise their statutory duty to secure the expeditious, convenient and safe movement of traffic, and the provision of suitable and adequate parking facilities in the context of the public health agenda. This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p>This proposal sets out the rationale of seeking 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.</p> <p>They explain the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is</p>

	<p>the concept that the environment is a key driver for health. It can be summarised by 'making the healthy choice the easy choice'.</p>
<p>2. How does this contribute to the council's corporate priorities?</p>	<p>It contributes in the following ways:</p> <ol style="list-style-type: none"> 1. Reduce congestion 2. Improve air quality and meet EU quality standards 3. To meet the actions set out in the Merton Health and Wellbeing Strategy 2019 4. Adopt a healthy street approach 5. Promote healthier life styles and encourage more active travel <p>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.</p> <p>Merton Air Quality Action Plan 2018-2023</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. 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.</p>

	<p>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.</p> <p>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. There are four focus areas in the borough. These are in the main centres of Mitcham, Morden, Raynes Park and Wimbledon.</p> <p>Parking and Traffic Management This proposed Parking Charges report sets out the important role Parking and transport policy has in managing the roads and wider travel needs of the public. Merton's policy links closely with the local Implementation Plan and the Mayors Transport Strategy, which sets out objectives in detail.</p>
<p>3. Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc.</p>	<p>The proposal will affect all residents, businesses, workers and visitors to the borough, across all socio-economic groups, who own a diesel vehicle. In order to set the context for the proposal the following profile has been used.</p> <p>Merton's profile Merton has a diverse and growing population. In 2018, Merton has an estimated resident population of 209,400, which is projected to increase by about 3.9% to 217,500 by 2025. The age profile is predicted to shift over this time, with notable growth in the proportions of older people (65 years and older) and a decline in the 0-4 year old population.</p>

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

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>

In 2018, east Merton has an estimated resident population of 110,200 which is projected to increase to 113,900 by 2025 (a 3.3% increase) compared to west Merton, which has an estimated resident population of 99,200 which is projected to increase to 103,600 by 2025 (a 4.5% increase). East Merton generally has a larger younger population of 0-29 year olds compared to west Merton, which generally has a larger population of people, aged 35 and over.

In 2018, Merton has an estimated 135,200 working age population (18-64 year olds), which make up 64.5% of the total population. By 2025 this is predicted to increase in numbers to almost 140,000 (although decrease slightly as a proportion of the total population, to 64.3%). Almost 72,000 of this age group currently reside in east Merton compared to 63,200 in west Merton. There is expected to be an increase by 2025 to 73,800 in east Merton and 66,200 in west Merton.

	<p>Merton has 22,350 people aged 65-84 years old (10.7% of the total population). By 2025, this is predicted to increase to 24,350 (11.2%). 10,350 live in east Merton compared to 12,000 in west Merton. By 2025 there is expected to be an increase to 11,550 in east Merton and almost 12,800 in west Merton.</p> <p>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.</p>
<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>Yes. Responsibility is shared with the following departments, organisations and partners. Future Merton, Highways and Transportation, Planning, Mayor of London, TfL, transport operators, Parking Services.</p>

Stage 2: Collecting evidence/ data

5. What evidence have you considered as part of this assessment?

Provide details of the information you have reviewed to determine the impact your proposal would have on the protected characteristics (equality groups).

The Council have assessed the use of public transport and active transport and are considered alternatives to owning a vehicle. Specifically diesel cars contribute significantly to poor air quality. There are also other vehicle types such as electric or hybrid which are clear alternatives.

In the proposal there will be locations where currently a P&D machine is in situ, but may be removed and for a 'cashless' payment to be made through a phone or APP. This assessment has considered the impact on individuals unable to pay by phone or APP at locations where cash machines are not an option.

In respect of the locations where the 100 new machines are being put in, consideration will be given to have cash and card payments or just cash.

Key factors considered included:

- (i) Air Quality hotspots
- (ii) Areas of high congestion

Merton is committed to undertaking comprehensive consultation to gain the views of residents and stakeholders. This enables the Council to make informed decisions and to develop our policies.

Stage 3: Assessing impact and analysis

6. 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		X		<p><u>Positive Impact</u></p> <p>The proposals support the principle of a shift away from polluting vehicles to alternative forms of transport for all owners of diesel cars within the borough. This policy has a positive health benefit to all.</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p><u>Potential Negative Impact</u></p> <p><u>(Areas of mobile phone payments only)</u></p> <p>There may be a number of residents (predominantly elderly) who do not own a mobile phone and would be unable to make payment via RingGo in locations where there is no machine to do so, they would be unable to make payment unless an alternative option is available.</p> <p><u>(Locations where there is a machine to make payment)</u></p>

				<p>In the case where there is a machine available for payment, it is being considered for these machines to only take cashless payments. If a motorists does not have a bank card to make payment, they would be unable to make payment unless an alternative option is available.</p> <p>However, car tax, insurance and maintenance petrol cost/expenditure would mean that it is very unlikely that a vehicle owner did not have a bank card to make payment.</p>
Disability	X		X	<p><u>Positive Impact</u></p> <p>The proposals support the principle of a shift away from polluting vehicles to alternative forms of transport for all owners of diesel cars within the borough. This policy has a positive health benefit to all.</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p><u>Potential Negative Impact</u></p> <p><u>(Areas of mobile phone payments only)</u></p> <p>Digitisation statistics do show individuals with a disability are less likely to own a mobile phone and would therefore be unable to make payment via RingGo, in locations where there is no machine to do so, unless an alternative option is available.</p> <p><u>(Locations where there is a machine to make payment)</u></p> <p>In the case where there is a machine available for payment, it is being considered for these machines to only take cashless payments. If a motorists does not have a bank card to make</p>

					<p>payment, they would be unable to make payment unless an alternative option is available.</p> <p>However, car tax, insurance and maintenance petrol cost/expenditure would mean that it is very unlikely that a vehicle owner did not have a bank card to make payment.</p>
Gender Reassignment	X			X	<p><u>Positive Impact</u></p> <p>The proposals support the principle of a shift away from polluting vehicles to alternative forms of transport for all owners of diesel cars within the borough. This policy has a positive health benefit to all.</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p><u>Potential Negative Impact</u></p> <p>None identified</p>
Marriage and Civil Partnership	X			X	<p><u>Positive Impact</u></p> <p>The proposals support the principle of a shift away from polluting vehicles to alternative forms of transport for all owners of diesel cars within the borough. This policy has a positive health benefit to all.</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p><u>Potential Negative Impact</u></p>

					None identified
Pregnancy and Maternity	X			X	<p><u>Positive Impact</u></p> <p>The proposals support the principle of a shift away from polluting vehicles to alternative forms of transport for all owners of diesel cars within the borough. This policy has a positive health benefit to all.</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p><u>Potential Negative Impact</u></p> <p>None identified</p>
Race	X			X	<p><u>Positive Impact</u></p> <p>The proposals support the principle of a shift away from polluting vehicles to alternative forms of transport for all owners of diesel cars within the borough. This policy has a positive health benefit to all.</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p><u>Potential Negative Impact</u></p> <p>None identified</p>
Religion/ belief	X			X	<u>Positive Impact</u>

					<p>The proposals support the principle of a shift away from polluting vehicles to alternative forms of transport for all owners of diesel cars within the borough. This policy has a positive health benefit to all.</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p><u>Potential Negative Impact</u></p> <p>None identified</p>
Sex (Gender)	X			X	<p><u>Positive Impact</u></p> <p>The proposals support the principle of a shift away from polluting vehicles to alternative forms of transport for all owners of diesel cars within the borough. This policy has a positive health benefit to all.</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p><u>Potential Negative Impact</u></p> <p>None identified</p>
Sexual orientation	X			X	<p><u>Positive Impact</u></p> <p>The proposals support the principle of a shift away from polluting vehicles to alternative forms of transport for all owners of diesel cars within the borough. This policy has a positive health benefit to all.</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of</p>

				<p>vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p><u>Potential Negative Impact</u></p> <p>None identified</p>
Socio-economic status	X		X	<p><u>Positive Impact</u></p> <p>The proposals support the principle of a shift away from polluting vehicles to alternative forms of transport for all owners of diesel cars within the borough. This policy has a positive health benefit to all.</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p><u>Potential Negative Impact</u></p> <p>The increased cost of parking a diesel car would have a negative impact to those who are less well off.</p> <p><u>(Areas of mobile phone payments only)</u></p> <p>Those individuals who drive a vehicle but cannot afford a mobile phone may be disadvantaged and would therefore be unable to make payment via RingGo, in locations where there is no machine to do so, unless an alternative option is available.</p> <p><u>(Locations where there is a machine to make payment)</u></p> <p>In the case where there is a machine available for payment, it is being considered for these machines to only take cashless payments. If a motorists does not have a bank card to make payment, which may be case in some social-economic groups, they</p>

					<p>would be unable to make payment unless an alternative option is available.</p> <p>However, car tax, insurance and maintenance petrol cost/expenditure would mean that it is very unlikely that a vehicle owner did not have a bank card to make payment.</p>
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7. If you have identified a negative impact, how do you plan to mitigate it?

The mitigations for disability, age, pregnancy & maternity and socio-economic status are set out in the Action Plan below.

Stage 4: Conclusion of the Equality Analysis

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

Please refer to the guidance for carrying out Equality 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.

Outcome 2 – The EA has identified adjustments to remove negative impact or to better promote equality.

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.

Outcome 4 – The EA shows actual or potential unlawful discrimination.

Stage 5: Improvement Action Pan

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

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?
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<p>Age</p>	<p>There are a number of alternatives to the use/ownership of a diesel vehicle, including cleaner vehicles or the transition to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality.</p> <p><u>Access to bank cards.</u></p> <p>The cost of maintain a car in London is significant and includes, car tax, insurance and maintenance petrol. This cost/expenditure would mean that it is very unlikely that a vehicle owner did not have a bank card to make payment at locations where card only payments are to be accepted.</p> <p>However there may be some residents, (who are more likely to be elderly) who do not have a bank card.</p> <p>Debit or Credit card ownership in the UK is significant with a growing trend of more ownership and usage. Further the use of contactless payments has increased in recent years which has made payment quicker and easier. Statistics show</p>		Current	Existing	Ben Stephens	Yes
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the younger the age the higher the ownership and use. For the more elderly **XX** own a bank card which would be used for payment. Individuals who drive a vehicle for business and or pleasure are more active and mobile, and are already more likely to use a bank card to make payments.

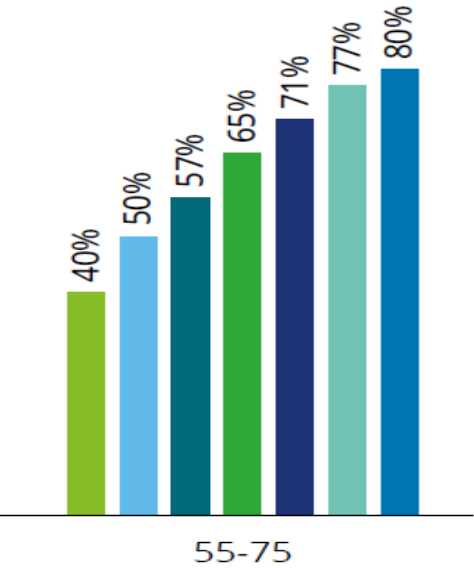
Access to smart phones

Locations where only a mobile phone can be used accounts for 20% of all transactions/locations.

Smartphone adoption among 55-75-year-olds in the UK has now reached 80%. (Graph below)
 Therefore 80% of 55-75 year old have the option to pay by smart phone. This figure is for the UK and it is known that there is a greater uptake of digitalisation in London and the South East. 18-24-year-olds, market penetration is at a record 96%. 95% of smart phone users have used their phone within the last 24 hours which shows regular use. (Deloitte survey September 2019).

The table below shows increase in smart phone ownership over the last 7 years with it being at 80% in 2019.

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	 <p>55-75</p> <p>The council will offer an option to sell single use scratch cards in advance for use when parking at locations where cash is not an alternative.....</p>					
<p>Socio-economic status</p>	<p>There are a number of alternatives to the use/ownership of a diesel vehicle, including cleaner vehicles or the transition to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality.</p> <p><u>Access to bank cards.</u></p> <p>The cost to maintain a car in London is significant and includes, car tax, insurance and maintenance</p>					

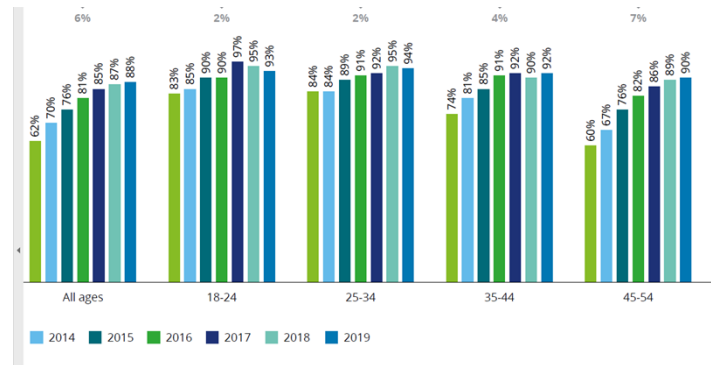
petrol. This cost/expenditure would mean that it is very unlikely that a vehicle owner did not have a bank card to make payment at locations where card only payments are to be accepted.

However there may be some residents, (who are more likely to be unable to get credit or a bank account) who do not have a bank card.

Debit or Credit card ownership in the UK is significant with a growing trend of more ownership and usage. Further the use of contactless payments has increased in recent years which has made payment quicker and easier. Statistics show the younger the age the higher the ownership and use. However individuals who drive a vehicle for business and more likely to use a bank card to make payments.

Access to phones

Locations where only a mobile phone can be used accounts for 20% of all transactions/locations



The graph above shows that no less than 90% of all UK residents (in each age group) up to the age of 75 own a 'Smartphone. Figures cannot be found for a normal mobile phone. It is clear that

	<p>the ability to pay by phone is accessible to all and there is little indication that a low socio economic status has an effect on phone ownership, particularly in cases where a car is also owned or used by the individual.</p>					
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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

<p>This Equality Analysis has resulted in an Outcome 2 Assessment</p>
<p>Please include here a summary of the key findings of your assessment. Diesel vehicles contribute to poor air quality. An increase on the surcharge will have the effect of nudging diesel car owners away from owning a diesel car. Reduced car and especially polluting diesel cars will help deliver key strategic council priorities including public health, air quality and sustainable transport and deliver an effective parking management strategy.</p> <p>The Council have assessed the use of public transport and active transport and are considered alternatives to owning a vehicle. Specifically diesel cars contribute significantly to poor air quality. There are also other vehicle types such as electric or hybrid which are clear alternatives.</p> <p><u>Positive Impact</u></p> <p>The proposals support the rationale of seeking 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.</p> <p>In setting out its measures of success, the new PCN charging bands aims to deliver:</p>

It contributes in the following ways:

1. Reduce congestion
2. Improve air quality and meet EU quality standards
3. To meet the actions set out in the Merton Health and Wellbeing Strategy 2019
4. Adopt a healthy street approach
5. Promote healthier life styles and encourage more active travel

Negative Impact

The increase cost of the diesel levy surcharge could have a negative effect on individuals who own a diesel car and find the additional charge challenging. This is mitigated because there are a number of alternatives to the use/ownership of a diesel vehicle, including cleaner vehicles or the transition to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality.

To facilitate this introduction of an on/off start diesel charge 100 new machines are required which can charge based on vehicle type. In some location payment by mobile phone only is an option. Data shows that no less than 90% of all UK residents (in each age group) up to the age of 75 own a 'Smartphone. Figures cannot be found for a normal mobile phone. It is clear that the ability to pay by phone is accessible to all and there is little indication that a low socio economic status has an effect on phone ownership, particularly in cases where a car is also owned or used by the individual.

In 100 locations (or where 80% of all transactions take place) payment by bank card will be an option. However given the cost to maintain a car in London is significant and includes, car tax, insurance and maintenance petrol. This cost/expenditure would mean that it is very unlikely that a vehicle owner did not have a bank card to make payment at locations where card only payments are to be accepted.

Monitoring

There is a commitment that the EA Plan will be reviewed in 12 months' time and will be published on the Council's website.

What course of action are you advising as a result of this assessment?

Section 5 – Improvement Action Plan sets out the actions and timescales proposed to be undertaken.

Stage 7: Sign off by Director/ Head of Service

Assessment completed by	Ben Stephens – Head of Parking Services	Signature:	Date:1st November 2019
Improvement action plan signed off by Director/ Head of Service	Chris Lee – Director of Environment and Regeneration	Signature:	Date: