

Emission Based Parking Charges- Equalities Assessment (November 2020)

Equality Analysis



Please refer to the guidance for carrying out Equality Assessments is available on the intranet	
What are the proposals being assessed?	Emission based parking charges The proposals are to introduce a model for parking charges that considers the emissions of the vehicle. The proposal will apply to parking permits in Controlled Parking Zones (CPZs) and short-term parking sessions in CPZs, pay and display bays and Council operated car parks.

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	Car use has continued to rise in recent years across all regions of England and all London boroughs including Merton. High levels of car use are associated with a number of challenges including; traffic

<p>proposal? (Also explain proposals e.g. reduction/removal of service, deletion of posts, changing criteria etc.)</p>	<p>congestion and parking dominance, road safety concerns; public health concerns associated with sedentary lifestyles and; vehicular emissions that contribute to local air pollution and climate change.</p> <p>There is a general consensus that the only realistic way to address these issues is through encouraging a shift away from car use towards more sustainable modes of travel and to lower polluting vehicles.</p> <p>Parking management is one of the few tools currently available to local authorities which can complement measures to provide better active travel and public transport options. Parking prices can influence decisions about whether to own a car and what type of car to purchase (Local Government Association - Climate Smart Parking Policies). Without changes in how parking is managed, progress on mode shift to sustainable travel modes and lower polluting vehicles will likely be limited to well below the levels required to achieve transport, public health and climate change objectives.</p> <p>Merton's existing parking management policies aim to encourage sustainable travel choices. The emission based parking charges proposal builds on and strengthens the existing model by introducing two additional elements that specifically target the emissions that contribute towards climate change and air pollution, with the aim of encouraging a switch to lower polluting vehicles.</p> <p>The proposal introduces different charging bands for CO2 emissions which are based on the principles and categories of 'the Government Vehicle Excise Duty (VED). The car tax bandings range from A to M, with category 'A' being for the least polluting vehicles and M the highest. VED was introduced by the government to move vehicle owners away from higher CO2 polluting vehicles and is familiar to motorists.</p> <p>To address local air pollutants, it is also proposed to replace the existing Diesel Levy surcharge that was introduced in 2017, with one that is based on the TfL Ultra Low Emission Zone (ULEZ) charging model, which uses Euro vehicle emissions standards. The ULEZ zone will be expanded in October 2021 to the neighboring boroughs of Wandsworth and Lambeth, which will be likely to affect some Merton residents that travel into this zone, so aligning with this scheme will provide a consistent message for residents, which is supported by Transport for London.</p> <p>When applying for an emissions based permit, the customer will enter their vehicle registration into the system, and the permit system will use that to look up the vehicle emissions for that vehicle on the Gov.uk. Website. The permit cost to the customer will be determined by the emission levels listed there.</p>
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<p>2. How does this contribute to the council's corporate priorities?</p>	<p>The proposal will make a vital contribution towards Merton's strategic objectives and policies as set out in the Transport Strategy (LIP3), Health and Wellbeing Strategy, Air Quality Action Plan, and the Climate Strategy and Action Plan.</p> <p>The primary objectives of the emissions based parking charging proposals are to:</p> <ul style="list-style-type: none"> • Reduce the CO2 emissions the contribute towards climate change • Reduce the vehicular emissions of local air pollutants • Reduce congestion • Reduce parking pressure and dominance • Improve public health outcomes through uptake of active travel modes • Improve road safety outcomes <p>Climate Strategy and Action Plan 2020</p> <p>Transport is a major producer of the greenhouse gas emissions that contribute towards climate change. Cars produce more carbon dioxide emissions (CO2) than all other modes of transport put together. The use of petrol and diesel vehicles in the borough makes up 19% of Merton's CO2 emissions as a result of the 600 million kilometres driven in Merton each year.</p> <p>In July 2019, Merton agreed to work towards net-zero carbon emissions from the borough by 2050 and have developed a Climate Strategy and Action Plan which was approved by the Council in November 2020, which incorporates an action on emissions based charging.</p> <p>Merton Air Quality Action Plan 2018-2023</p> <p>Merton's Air Quality Action Plan is ambitious in its aims and demonstrates that we as an authority will use all of the powers available to tackle toxic air in the borough. Action 32 of Merton's Air Quality Action Plan 2018 states that there would be a review of the impact of our diesel levy and consider a review of parking and charges to help reduce combustion engine vehicle use and the consequent emission.</p> <p>Vehicular traffic is one of the major sources of the vehicular emissions that result in local air pollution including nitrogen dioxide (NO2) and Particulate matter (PM). These pollutants are recognised as a major</p>
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contributor to poor health and associated with a range of cardiovascular, respiratory health and cognitive conditions.

Air pollution particularly affects the most vulnerable in society including children, older people, and anyone with long-term health conditions. 6.5% of mortality in Merton is attributable to the harm caused by poor air quality, equivalent to around 75 deaths every year. The impacts of air quality on respiratory health and other associated conditions has also had important implications during the COVID-19 pandemic with 35% of UK COVID deaths occurring in those with a pre-existing respiratory or cardiovascular medical condition.

A recent [study](#) found that the health and social costs of air pollution from roads are £1,173 per person per year in London, which are higher than any other city in Europe.

Air pollution concentrations in Merton continue to breach the legally binding air quality limits for both NO₂ and PM₁₀. In Merton, transport emissions account for approximately 60% of emissions of NO₂. Air pollution is particularly bad in proximity to busy traffic routes including in the town centres of Morden, Mitcham, Wimbledon and Raynes Park.

Covid-19 Transport Impacts

The Covid-19 crisis developed in March 2020 and has since had a significant impact on work and travel patterns as well as the availability and capacity of public transport. The initial complete lockdown resulted in a reduction in travel by all modes and a dramatic fall in car use. As the roads became quieter, the levels of cycling and walking increased. Provisional air quality monitoring data indicated a significant improvement in air quality across the borough during the full lockdown period, with levels at most sites reducing to within legal limits. An early study estimated that across the UK, 1,752 premature deaths attributable to air pollutant exposure were avoided during the 1st month of lockdown alone.

However, this dramatic decline in car use was only temporary and as the lockdown has eased, car use and congestion have increased again and it has been reported to exceed pre Covid levels in outer London. The associated rise in air pollutants recorded is particularly concerning in light of emerging reports that high levels of local air pollutants can worsen the health impacts of Covid-19. 35% of UK COVID deaths occur in those with a pre-existing respiratory or cardiovascular medical condition.

This has reinforced the need to act robustly and quickly to ensure that any changes to transport behaviour as a result of Covid do not further contribute to the transport challenges we face, particularly in relation to

	<p>air quality. Whilst public transport has been adversely affected during the pandemic this is not expected to be a permanent change and we expect public transport use to return to pre Covid levels over time during 2021.</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>By contributing towards reducing the challenges associated with vehicle use and emissions, this proposal has the potential to positively affect all residents, businesses, workers and visitors to the borough, across all socio-economic groups.</p> <p>The proposals to introduce emissions based parking charges will directly affect some of those that park a vehicle in a Controlled Parking Zone (CPZ) or a Council controlled car park, through varying the existing parking charges that apply.</p> <p>The existing provisions for free parking for Blue badge holders and free Carer permits will be unaffected by these proposals.</p> <p>The emission based charging model will be applied to most other on street annual permit types including residential, teacher, business and trader permits. An emission based charging model will also be applied to short term parking including, visitor e-permits, visitor scratch cards and pay and display parking on-street and in Council car parks.</p> <p>The emission based model charges variable rates dependent on the emissions of the vehicle, so not all permit holders will be affected by increased prices. In response to feedback, the proposed prices for annual residents permits for the middle bands G and H have been slightly reduced by £5 and £20 respectively. This change means that approximately 50% of the least polluting vehicles will not pay a higher charge. Approximately a third of permits will be subject to a significant increase of between £150 and £390 per year, which specifically targets the most polluting vehicles. Some newer diesel models will become exempt from paying the additional ULEZ surcharge of £150 although some older more polluting petrol vehicles may also become liable for this charge.</p>
<p>4. Is the responsibility shared with another department, authority or organisation? If so, who</p>	<p>Responsibility is shared with the following departments, organisations and partners: Public Health, Future Merton, Planning, Environmental Health. Department for Transport, NHS, Mayor of London, TfL, Transport Operators.</p>

are the partners and who has overall responsibility?

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).

Information and research from a number of reports from a range of sources, including the Government and Transport for London, have been assessed when developing the proposals. Links to all relevant reports are included in the main report document, emissions based parking charges– a strategic approach.

Merton's profile

Merton has a diverse and growing population.

Data from the housing-led population projections for London which are produced by GLA Demography estimate the future trajectory of London's population at local authority level. Merton has a projected resident population of 211,787 for 2020 which is projected to increase to 224,502 by 2030. The Female population slightly exceeds the male population, particularly in the over 75 age groups.



Date: 2020 Source: GLA

2020 population projection for all persons by 5 year age group are shown in the chart above. Merton’s 2020 projected ethnic makeup is shown in the following chart.



Date: 2020 Source: GLA

Consultation with Equalities Groups– Steps taken

Merton is committed to undertaking comprehensive consultation to gain the views of a range of residents and stakeholders. As part of the consultation process the Council undertook additional measures to ensure that key equalities groups were aware of and understood the proposals and had ample opportunity to submit comments.

The list below shows the organisations that were directly contacted at the start of the consultation in September 2020 seeking their views. In addition, details of the consultation were also sent to Merton Voluntary Service Council (MVSC) who in themselves have direct links to over 800 voluntary groups and organisations in Merton.

The councils' consultation website and the emails sent to the relevant equality groups all included hyperlinks to the consultation web pages, and details on how to make further representations.

Invites to a briefing webinar were also sent via email to equality groups on 22 September 2020. The webinar was held on 24 September 2020 with representatives from Morden Islamic Community Centre, BAME and Merton Senior Forum attending. A second webinar was held for Merton CAB on 8 October as they were unable to attend the 24 September webinar.

A series of follow up telephone calls were made to equality groups that had not responded to the consultation email they were sent.

A summary of the issues raised by Equality Groups are given below.

BAME voice & Merton Seniors Forum

A representative from BAME and Merton Seniors Forum attended the webinar on 24 September 2020.

Following the webinar, BAME Voice emailed comments that focussed on the ability of those with highly polluting cars to be able to pay the charge or change their vehicle, particularly for unemployed residents.

Merton CAB

Merton CAB were unable to attend the 24 September webinar, but attended a webinar on 8 October 2020. The issues raised by the Merton CAB representative were as follows;

- Concerns about digital exclusion e.g. access to Smart phone and/or bank account to book/pay for parking via RingGo.-
Concerns about the impact on Socio-economic groups as finance issues are a high concern in Merton and often the basis for

visits to CAB.

- Concerned about the impact on the disabled within Merton

Morden Islamic Community Centre

A representative attended the 24 September 2020 webinar on behalf of Morden Islamic Community Centre, and following the webinar, asked the following questions;

- How will this proposal effect pay and display machines?
- Will the free bays surrounding Morden be affected?
- Are the car parks in Merton affected?
- How does it impact on the low traffic scheme?
- Will the free parking in Morden be affected

Merton CIL

Merton CIL replied to comment that as these proposals do not impact on Blue Badge holders, they do not feel a need to comment.

Merton Seniors Forum

The BAME Voice representative attended the webinar on 24 September 2020 on behalf of BAME Voice and Merton Seniors Forum. Please see above comments under BAME Voice.

Merton Vision

Merton Vision completed the online survey but did not make any further comments.

Merton Carer Support

Merton Carer Support confirmed that they had passed details of the consultation to their members

Polish Family Organisation

The Polish Family Organisation completed the consultation survey, but did not make any further comments.

Shree Ganapathy Temple

On 27 October 2020, an email was received from the Shree Ganapathy Temple, asking for further time to reply to the consultation. The deadline was extended but no further communications were received.

No direct response was received from the following organisations

The Wimbledon Guild, Age UK Merton, Ethnic Minority Centre, Mitcham and Morden Guild, Merton Mencap, Wimbledon and District NCT Group, Southwest London Tamil Welfare Group, West Indian Friends and Family Association, Wimbledon Mosque and RHEMA Church Ministries.

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>Positive Impact</p> <p>The primary objective of the emissions based parking charging proposals is to set a pricing model that encourages a shift away from car use towards more sustainable modes of travel and to lower polluting vehicles. This will support the following outcomes, which will be of benefit to everyone in Merton, including protected characteristic groups:</p> <ul style="list-style-type: none"> • Reduce the CO2 emissions the contribute towards climate change • Reduce the vehicular emissions of local air pollutants

- Reduce congestion
- Reduce parking pressure and dominance
- Improve public health outcomes through increased uptake of active travel modes
- Improve road safety outcomes

Some age groups may particularly benefit from these outcomes as they may be more vulnerable to the transport issues associated with high levels of car use and emissions. In particular, young children are more vulnerable to the effects of air pollution and young adults suffer a disproportionately high level of road traffic accidents (TfL 2019).

The proposals enhance improvements in technology which improve convenience for users by enabling parking to be paid for remotely and without cash.

Negative Impact

The proposal will result in increased parking charges for those that own more polluting vehicles and this has the potential to have a negative financial impact on some individuals with lower incomes.

Data from TfL for London on car ownership by age (Travel in London report 12, 2019) indicates that younger adults (20-29) and the elderly (80+) are the groups will the lowest levels of car ownership, so will be less likely as a group to be subject to any negative financial implications.

	No car	One car	Two or more cars
20-29	47.4%	32.5%	20.0%
30-39	39.6%	46.5%	13.9%
40-49	31.0%	47.2%	21.8%
50-59	29.0%	41.2%	29.8%
60-69	29.3%	44.7%	25.9%
70-79	35.2%	47.5%	17.4%
80+	56.8%	38.1%	5.1%

An estimated 3,650 people aged 85 years and over (1.7% of the total population) currently live in Merton. By 2025, this is predicted to increase to almost 3,950 (1.8%). It is recognised that older

				<p>residents may be less likely to be able to rely on active forms of travel as an alternative to the car, but are eligible for the freedom pass that enables them to travel free on all public transport services in London during off-peak hours.</p> <p>Elderly groups are more likely to be affected by social isolation and loneliness and as they are less likely to own their own vehicle, they may be more dependent than other groups on visitors. The introduction of an emissions based charging model for visitor parking relies on the use of the RingGo cashless parking payment APP which will automatically calculate the applicable charge for the emissions of that vehicle. E-permits purchased via the RingGo app have increased to account for 40% of visitor permit sales. However, elderly residents may be more likely to be subject to digital exclusion because they do not own a mobile phone and/or online banking so would be unable to make a payment via this method. Whilst Smart phone usage is increasing and is currently at 90% of the adult population, it falls to 80% for those aged over 65 and is likely to be significantly less for those over 80. A non-digital alternative will continue to be available as paper visitor scratch cards. However, as these are non-vehicle specific it will be necessary for these permits to be priced so that they reflect the maximum charge that could be payable resulting in the cost of scratch cards increasing significantly. There is a risk that this could either increase social isolation for older residents by reducing visitors and/ or have a detrimental financial impact.</p>
Disability	X		X	<p>Positive Impact</p> <p>The primary objective of the emissions based parking charging proposals is to set a pricing model that encourages a shift away from car use towards more sustainable modes of travel and to lower polluting vehicles. This will support the following outcomes, which will be of benefit to everyone in Merton, including protected characteristic groups:</p> <ul style="list-style-type: none"> • Reduce the CO2 emissions the contribute towards climate change • Reduce the vehicular emissions of local air pollutants • Reduce congestion • Reduce parking pressure and dominance • Improve public health outcomes through increased uptake of active travel modes • Improve road safety outcomes

				<p>Existing parking dominance can negatively affect accessibility within the street environment for those with visibility and mobility issues, particularly wheelchair users, by blocking crossing opportunities and reducing pavement widths.</p> <p>Negative Impact</p> <p>None identified. Merton is committed to supporting its residents that have mobility issues and is a member of the national Blue Badge scheme, which provides a range of parking and other motoring concessions for people who are registered blind or have severe mobility problems. In 2019 The Blue Badge eligibility scheme was further extended to those with a wide range of hidden health issues that affect their mobility.</p> <p>5564 Merton residents currently hold a blue badge. Residents with mobility issues and complex needs who reside in a CPZ and require regular support and care are also entitled to apply for a free carer's permit. This is a free, annual permit that is not vehicle specific, and can be used by carers, relatives, and tradespeople visiting the Blue badge holder.</p> <p>Blue Badge holders are unaffected by these proposals and can continue to park free of charge in any Merton disabled parking bay, pay & display and shared use bay or permit holder bay. Carers permits are also unaffected by these proposals and will not be subject to emissions based charges. Those with disabilities are also able to apply for the creation of a dedicated disabled bay in proximity their home.</p> <p>Disabled residents are also eligible for the freedom pass that enables them to travel free on all public transport services in London during off-peak hours, which is a significant benefit that supports the use of sustainable transport modes. Other transport schemes including dial a ride, Merton Community Transport and Personalised Transport Services are also available to assist Merton residents who have a substantial and permanent physical or sensory disability that affects their mobility and means they are unable to use public transport without extreme difficulty.</p>
Gender Reassignment	X		X	Positive Impact

					<p>The primary objective of the emissions based parking charging proposals is to set a pricing model that encourages a shift away from car use towards more sustainable modes of travel and to lower polluting vehicles. This will support the following outcomes, which will be of benefit to everyone in Merton, including protected characteristic groups:</p> <ul style="list-style-type: none"> • Reduce the CO2 emissions the contribute towards climate change • Reduce the vehicular emissions of local air pollutants • Reduce congestion • Reduce parking pressure and dominance • Improve public health outcomes through increased uptake of active travel modes • Improve road safety outcomes <p>The proposals enhance improvements in technology which improve convenience for users by enabling parking to be paid for remotely and without cash.</p> <p>Negative Impact</p> <p>The proposal will result in increased parking charges for those that own more polluting vehicles and this has the potential to have a negative financial impact on some individuals with lower incomes, although this is not considered to have a particular negative affect on this protected characteristic group. The impacts for lower income groups and mitigating measures are set out in more detail under the section on the socio economic characteristic.</p>
Marriage and Civil Partnership	X			X	<p>Positive Impact</p> <p>The primary objective of the emissions based parking charging proposals is to set a pricing model that encourages a shift away from car use towards more sustainable modes of travel and to lower polluting vehicles. This will support the following outcomes, which will be of benefit to everyone in Merton, including protected characteristic groups:</p> <ul style="list-style-type: none"> • Reduce the CO2 emissions the contribute towards climate change • Reduce the vehicular emissions of local air pollutants • Reduce congestion • Reduce parking pressure and dominance

				<ul style="list-style-type: none"> • Improve public health outcomes through increased uptake of active travel modes • Improve road safety outcomes <p>The proposals enhance improvements in technology which improve convenience for users by enabling parking to be paid for remotely and without cash.</p> <p>Negative Impact</p> <p>The proposal will result in increased parking charges for those that own more polluting vehicles and this has the potential to have a negative financial impact on some individuals with lower incomes, although this is not considered to have a particular negative affect on this protected characteristic group. The impacts for lower income groups and mitigating measures are set out in more detail under the section on the socio economic characteristic.</p>
Pregnancy and Maternity	X		X	<p>Positive Impact</p> <p>The primary objective of the emissions based parking charging proposals is to set a pricing model that encourages a shift away from car use towards more sustainable modes of travel and to lower polluting vehicles. This will support the following outcomes, which will be of benefit to everyone in Merton, including protected characteristic groups:</p> <ul style="list-style-type: none"> • Reduce the CO2 emissions the contribute towards climate change • Reduce the vehicular emissions of local air pollutants • Reduce congestion • Reduce parking pressure and dominance • Improve public health outcomes through increased uptake of active travel modes • Improve road safety outcomes <p>Existing congestion and parking dominance can negatively affect accessibility within the street environment particularly for parents with pushchairs.</p> <p>According to a report by Unicef babies and young children are particularly vulnerable to the effects of air pollution which can lead to or exacerbate respiratory illnesses in developing lungs.</p>

The proposals enhance improvements in technology which improve convenience for users by enabling parking to be paid for remotely and without cash.

Potential Negative Impact

The proposal will result in increased parking charges for those that own more polluting vehicles and this has the potential to have a negative financial impact on some individuals with lower incomes, although this is not considered to have a particular negative affect on this protected characteristic group. Indeed, TfL data for London (2019) below shows that households with children on incomes deciles under £35k, have lower rates of car ownership than households without children. Less than one third of lone parents in London own a car. The impacts for lower income groups that are affected by these proposals and mitigating measures are set out in more detail under the section on the socio economic characteristic.

	Children in household	No children in household
< £10,000	24.4%	27.4%
£10,000 - £19,999	40.4%	46.8%
£20,000 - £34,999	53.4%	60.8%
£35,000 - £49,999	65.3%	64.9%
£50,000 - £74,999	75.0%	65.1%
£75,000 - £99,999	76.0%	69.0%
£100,000+	82.5%	71.8%
All incomes	54.8%	56.0%

It is recognised that making use of alternative models of car ownership, such as car clubs may be more challenging for families where there are a number of small children that require a car seat. It is also recognised that use of public transport can also be challenging for parents with

				<p>very young children reliant on buggies. In particular there are still stations in Merton that do not have step free access including Raynes Park.</p> <p>New parents may be more dependent than other groups on visitors to support them. The introduction of an emissions based charging model for visitor parking relies on the use of the RingGo cashless parking payment APP which will automatically calculate the applicable charge for the emissions of that vehicle. E-permits purchased via the RingGo app have increased to account for 40% of visitor permit sales. It is not considered that new parents may be particularly subject to digital exclusion.</p>
Race	X		X	<p>Positive Impact</p> <p>The primary objective of the emissions based parking charging proposals is to set a pricing model that encourages a shift away from car use towards more sustainable modes of travel and to lower polluting vehicles. This will support the following outcomes, which will be of benefit to everyone in Merton, including protected characteristic groups:</p> <ul style="list-style-type: none"> • Reduce the CO2 emissions the contribute towards climate change • Reduce the vehicular emissions of local air pollutants • Reduce congestion • Reduce parking pressure and dominance • Improve public health outcomes through increased uptake of active travel modes • Improve road safety outcomes <p>Research has shown that poor air quality is more likely to adversely affect those from BAME backgrounds, particularly in association with Covid-19.</p> <p>The proposals enhance improvements in technology which improve convenience for users by enabling parking to be paid for remotely and without cash.</p> <p>Negative Impact</p> <p>The proposal will result in increased parking charges for those that own more polluting vehicles and this has the potential to have a negative financial impact on some individuals with lower incomes. As a result of wider inequalities, BAME residents may be more likely to be on lower</p>

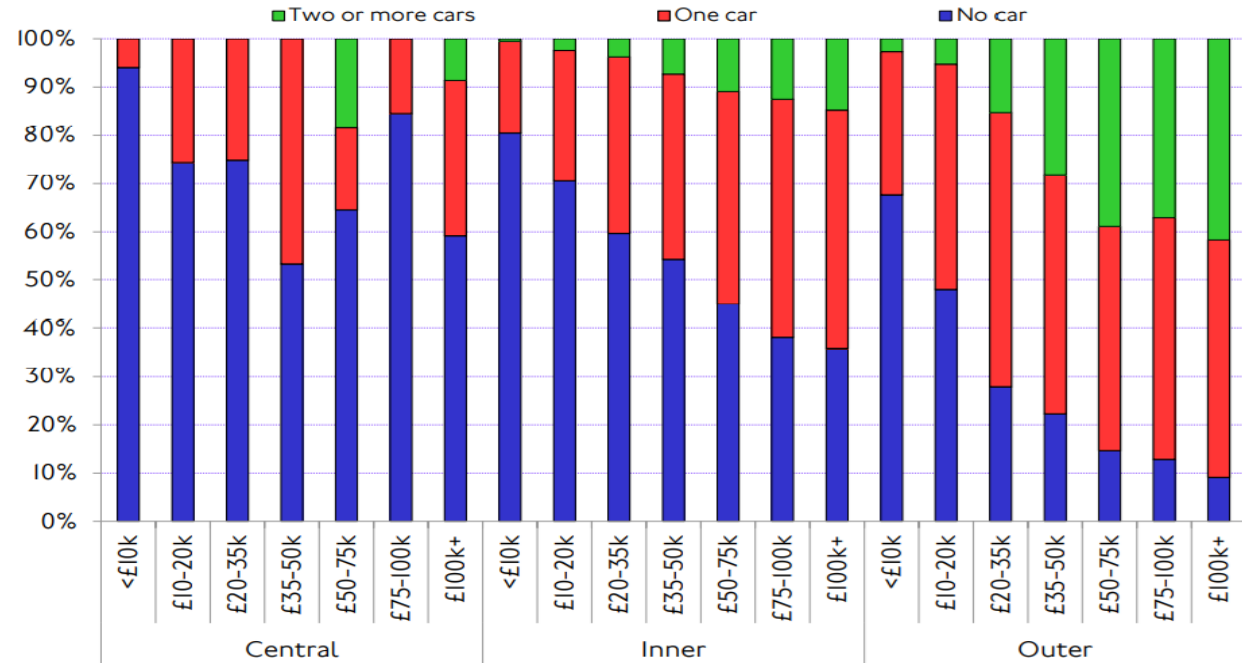
					incomes. The impacts for lower income groups and mitigating measures are set out in more detail under the section on the socio economic characteristic.
Religion/ belief	X			X	<p>Positive Impact</p> <p>The primary objective of the emissions based parking charging proposals is to set a pricing model that encourages a shift away from car use towards more sustainable modes of travel and to lower polluting vehicles. This will support the following outcomes, which will be of benefit to everyone in Merton, including protected characteristic groups:</p> <ul style="list-style-type: none"> • Reduce the CO2 emissions the contribute towards climate change • Reduce the vehicular emissions of local air pollutants • Reduce congestion • Reduce parking pressure and dominance • Improve public health outcomes through increased uptake of active travel modes • Improve road safety outcomes <p>The proposals enhance improvements in technology which improve convenience for users by enabling parking to be paid for remotely and without cash.</p> <p>Negative Impact</p> <p>The proposal will result in increased parking charges for those that own more polluting vehicles and this has the potential to have a negative financial impact on some individuals with lower incomes, although this is not considered to have a particular negative affect on this protected characteristic group. The impacts for lower income groups and mitigating measures are set out in more detail under the section on the socio economic characteristic.</p> <p>There is also some potential impact on religious groups associated with the need to park when travelling to religious meetings. The issue of visitor parking was specifically raised by a religious group in the consultation response.</p> <p>Visitors to religious venues parking in CPZs or Council car parks will be subject to the applicable emissions based charges that all visitors are subject to and which may result in an increase in</p>

					charges depending on the vehicle. It is recognised that religious meetings may occur during off peak times at evenings and weekends, but public transport in Merton is adequate at off peak times to accommodate this.
Sex (Gender)	X			X	<p>Positive Impact</p> <p>The primary objective of the emissions based parking charging proposals is to set a pricing model that encourages a shift away from car use towards more sustainable modes of travel and to lower polluting vehicles. This will support the following outcomes, which will be of benefit to everyone in Merton, including protected characteristic groups:</p> <ul style="list-style-type: none"> • Reduce the CO2 emissions the contribute towards climate change • Reduce the vehicular emissions of local air pollutants • Reduce congestion • Reduce parking pressure and dominance • Improve public health outcomes through increased uptake of active travel modes • Improve road safety outcomes <p>The proposals enhance improvements in technology which improve convenience for users by enabling parking to be paid for remotely and without cash.</p> <p>Negative Impact</p> <p>The proposal will result in increased parking charges for those that own more polluting vehicles and this has the potential to have a negative financial impact on some individuals with lower incomes, although this is not considered to have a particular negative affect on this protected characteristic group. The impacts for lower income groups and mitigating measures are set out in more detail under the section on the socio economic characteristic.</p>

Sexual orientation	X			X	<p>Positive Impact</p> <p>The primary objective of the emissions based parking charging proposals is to set a pricing model that encourages a shift away from car use towards more sustainable modes of travel and to lower polluting vehicles. This will support the following outcomes, which will be of benefit to everyone in Merton, including protected characteristic groups:</p> <ul style="list-style-type: none"> • Reduce the CO2 emissions the contribute towards climate change • Reduce the vehicular emissions of local air pollutants • Reduce congestion • Reduce parking pressure and dominance • Improve public health outcomes through increased uptake of active travel modes • Improve road safety outcomes <p>The proposals enhance improvements in technology which improve convenience for users by enabling parking to be paid for remotely and without cash.</p> <p>Negative Impact</p> <p>The proposal will result in increased parking charges for those that own more polluting vehicles and this has the potential to have a negative financial impact on some individuals with lower incomes, although this is not considered to have a particular negative affect on this protected characteristic group. The impacts for lower income groups and mitigating measures are set out in more detail under the section on the socio economic characteristic.</p>
Socio-economic status	X		X	<p>Positive Impact</p> <p>The primary objective of the emissions based parking charging proposals is to set a pricing model that encourages a shift away from car use towards more sustainable modes of travel and to lower polluting vehicles. This will support the following outcomes, which will be of benefit to everyone in Merton, including protected characteristic groups:</p> <ul style="list-style-type: none"> • Reduce the CO2 emissions the contribute towards climate change 	

				<ul style="list-style-type: none"> • Reduce the vehicular emissions of local air pollutants • Reduce congestion • Reduce parking pressure and dominance • Improve public health outcomes through increased uptake of active travel modes • Improve road safety outcomes <p>Housing located on very busy road routes can tend to be less affluent so residents living in these areas will be more likely to be on lower incomes and will be negatively affected to a greater extent by problems such as air pollution and road safety.</p> <p>The proposals enhance improvements in technology which improve convenience for users by enabling parking to be paid for remotely and without cash.</p> <p>Negative Impact</p> <p>Significant social inequalities exist within Merton. The eastern half has a younger, less affluent and more ethnically mixed population. The western half is less ethnically mixed, older and more affluent. Largely as a result, people in East Merton have worse health and shorter lives.</p> <p>Charges have been considered and set at levels, which will disincentivise car ownership and use and encourage consideration of lower emission vehicles choices. According to data from the RAC foundation the costs of motoring over the last decade have reduced in relation to both the cost of living and average wages. This is in comparison to public transport costs which have increased. This is likely to have incentivised car use and the proposals aim to mitigate against this at a local level. The proposal will result in increased parking charges for those that own more polluting vehicles and this has the potential to have a negative financial impact on some individuals with lower incomes because they have to pay higher charges for parking and are likely to be less able to replace their vehicle with a newer less polluting vehicle.</p> <p>The council is mindful of economic challenges facing many residents and visitors to the borough, but this needs to be balanced with obligations in relation to poor levels of air quality and to improve public health. Poor air quality and public health outcomes are known to particularly affect vulnerable groups including those on lower incomes.</p>
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Evidence from Transport from London indicates that lower income groups in Outer London are less likely to own a vehicle (TfL Travel in London report 12). Therefore, lower income groups are less likely to be affected by the proposals, although they are more likely to suffer the negative impacts of car use.



Source: Strategic Analysis, TfL City Planning.

It is recognised that in some areas with little transport alternative to owning a car, the upfront and annual costs of car ownership can result in people being pushed into transport poverty. This does not tend to apply to London, including significant parts of Merton, where sustainable travel alternatives tend to be good. Across most of Merton it is observed that car ownership rates tend to be lower in the wards with a higher proportion of residents in lower income deciles levels. Some lower income areas in the Borough that are particularly affected by poorer transport accessibility

				<p>do consequently have higher levels of car ownership (e.g. Pollards Hill and Longthornton Wards). However, as areas with lower public transport accessibility do not tend to have CPZs they will not be affected by these proposals.</p> <p>There are also supporting transport measures in place for low-income groups that will help to mitigate the impact of these proposals. TfL offer discounts of 50% on some public transport services for London residents on certain benefits, which makes sustainable transport options more affordable.</p> <p>TfL also offer a scrappage grant of £2k to London residents who are on certain benefits and have a car that does not comply with ULEZ standards. It is not expected that most residents will be in a position to switch to a fully electric vehicle immediately, but when they next decide to change their vehicle, they could consider a lower emission petrol model as an interim solution until an EV becomes a more feasible option. Under the proposed charging bands, a range of reasonably priced petrol vehicles are available on the second hand market with low emissions that will attract either a decrease, no increase or only a modest increase in parking charge.</p> <p>There are concerns that lower income groups could be more likely to be subject to digital exclusion which may prevent them from purchasing the lowest priced parking ticket available for visitor parking. However, smart phone ownership is at approximately 90% of the adult population and given the requirements to register, insure, and run a vehicle, it is unlikely that a motorist does not have access to a bank card.</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 and 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 Plan

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?
<p>Age It is recognised that the proposals for emissions based charging for visitors may have a particularly detrimental impact on the elderly that may be more likely to suffer from both social isolation and digital exclusion.</p>	<p>To mitigate this the Council proposes to provide a concession to those residents living in a CPZ that are over 75 and are registered on the Council tax register as a single occupant and in receipt of Council Tax benefit. These residents will be entitled to maximum of 12 visitor permits/ scratchcards per year at 50% discount in the CPZ that they reside.</p> <p>Promote and advertise existing transport and parking schemes to support older residents including the freedom pass, dial a ride etc.</p> <p>Continue to engage in ongoing dialogue with relevant equalities groups including Age UK</p> <p>Ensuring we have suitable accessibility and customer service options (channels) for older users who wish to make payments and access customer service assistance.</p> <p>Continue to train civil enforcement officers and parking to assist those with mental health issues including dementia friendly training</p>	<p>Customer feedback</p> <p>Number of scratch cards purchased.</p> <p>Number of discounted price visitor permits purchased.</p>	<p>Current</p>	<p>Existing</p>	<p>Ben Stephens</p>	<p>Yes</p>

<p>Pregnancy and Maternity</p> <p>It is recognised that making use of alternative models of car ownership, such as car clubs may be more challenging for families where there are a number of small children that require a car seat. It is also recognised that use of public transport can also be challenging for parents with very young children reliant on buggies.</p>	<p>Lobby TfL for improved access to public transport infrastructure.</p> <p>Lobby TfL and car club operators to provide family friendly options for car share and car hire schemes.</p>	<p>Customer Feedback</p> <p>Stations with step free access</p> <p>Car club membership</p>				
<p>Socio-economic status</p> <p>The proposal will result in increased parking charges for those that own more polluting vehicles and</p>	<p>The prices for annual residents permits for the middle bands G and H have been slightly reduced by £5 and £20 respectively. This change results in approximately 50% of the least polluting vehicles not paying a higher charge under these proposals, and reflects the consideration given to the results of the consultation process and the recently revised charges</p>	<p>Customer Feedback</p> <p>Increased number of new car club members</p> <p>Reduction in number of</p>				

<p>this has the potential to have a negative financial impact on some individuals with lower incomes because they have to pay higher charges for parking and are likely to be less able to replace their vehicle with a newer less polluting vehicle.</p>	<p>in January 2020.</p> <p>Consider the introduction of 1 and/or 3 monthly payment options, to assist those who cannot afford a 6 or 12 month permit in one payment.</p> <p>Better promote transport schemes available to low income groups, including public transport discounts and the ULEZ scrappage scheme.</p> <p>Introduction and promotion of low cost active travel schemes including residential secure cycle parking in low income areas.</p> <p>Seek to introduce cycle/ scooter hire schemes with concessions for low income groups.</p> <p>Lobby car clubs for discounted rates for low income groups.</p>	<p>permits</p> <p>Residential cycle parking spaces</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

This Equality Analysis has resulted in an Outcome **3** Assessment

Please include here a summary of the key findings of your assessment.

Vehicles contribute to poor air quality. An increase on the charge will have the effect of nudging vehicle owners away from owning a vehicle. Reduced car ownership will help deliver key strategic council priorities including public health, air quality and sustainable transport and deliver an effective parking management strategy.

There are both negative and positive impacts identified by the EA.

Officers have reviewed the equity of the proposals and accept that there will be some residents who may be negatively impacted. However, in light of the mitigation set out above the level of impact is assessed as likely to be low. The council considers that the impact is proportionate to the legitimate aim sought to be achieved through the policy that will have positive impacts for all residents.

Positive Impact

Positive Impact

The primary objective of the emissions based parking charging proposals is to set a pricing model that encourages a shift away from car use towards more sustainable modes of travel and to lower polluting vehicles. This will support the following outcomes, which will be of benefit to everyone in Merton, including protected characteristic groups:

- Reduce the CO2 emissions the contribute towards climate change
- Reduce the vehicular emissions of local air pollutants
- Reduce congestion
- Reduce parking pressure and dominance
- Improve public health outcomes through increased uptake of active travel modes
- Improve road safety outcomes

The proposals enhance improvements in technology which improve convenience for users by enabling parking to be paid for remotely and without cash.

Neutral Impact

There are no implications for Blue Badge Holders or Carer's permits.

Negative Impact

The proposal will result in increased parking charges for those that own more polluting vehicles and this has the potential to have a negative financial impact on some individuals with lower incomes who would find it difficult to replace their vehicle with a newer 'less polluting' vehicle. This is mitigated because there are a number of alternatives to the use/ownership of a vehicle, including car clubs or the transition to more active and sustainable transport modes (such as walking, cycling and public transport).

While it has been recognised that the move to emissions based charging would particularly impact negatively on those in the lower, socio economic groups, data published by TfL shows that those in lower socio economic groups are less likely to own a vehicle, and are therefore less likely to be affected by these charges. For those that are impacted, mitigating measures have been identified.

The Council recognises that the proposed price increases for visitor parking permits and in particular scratch cards, are more likely to have a detrimental impact on groups that are more vulnerable to both social isolation and digital exclusion. To mitigate this the Council proposes to provide a concession to those residents living in a CPZ that are over 75 and are registered on the Council tax register as a single occupant and in receipt of Council Tax benefit. These residents will be entitled to a maximum of 12 visitor permits per year at 50% discount in the CPZ she resides..

Monitoring

The original equalities assessment has been updated following the recent engagement with equalities groups. (October 2020). The Improvement Action Plan in Section 5 of the document sets out the actions and timescales proposed to be undertaken and the EA plan will be signed off and monitored by the Director of Environment and Regeneration and the Head of Parking Services.

The EA Plan and the policy would be kept under review and representatives of the affected groups will be consulted with to assess ongoing impacts and further mitigations.

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: <i>Ben Stephens</i>	Date: 12/01/2021
Improvement action plan signed off by Director/ Head of Service	Chris Lee – Director of Environment and Regeneration	Signature: <i>Chris Lee</i>	Date: 12/01/2021