

Equality Analysis Form

Delivering for Croydon

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1. Introduction

1.1 Purpose of Equality Analysis

The council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

Undertaking an Equality Analysis helps to determine whether a proposed change will have a positive, negative, or no impact on groups that share a protected characteristic. Conclusions drawn from Equality Analyses helps us to better understand the needs of all our communities, enable us to target services and budgets more effectively and also helps us to comply with the Equality Act 2010.

An equality analysis must be completed as early as possible during the planning stages of any proposed change to ensure information gained from the process is incorporated in any decisions made.

In practice, the term '**proposed change**' broadly covers the following:-

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service review;
- Budget allocation/analysis;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).

2. Proposed change

Directorate	PLACE
Title of proposed change	Emission-based and Increased Parking Charges – January 2021
Name of Officer carrying out Equality Analysis	Sarah Randall

2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)

Briefly summarise the proposed change and why it is being considered. Please also state if it is an amendment to an existing arrangement or a new proposal.

The proposal is to revise parking charges to help more effectively achieve the traffic management duty and manage parking provision across the borough road network in line with the Corporate Plan and the borough's growth objectives. This is part of Phase 3 for introducing emission-based parking charges, as defined in the Cabinet report on 25 March 2019 and agreed by Cabinet on this date, subject to consultation.

This EA is a living document, which will be revised as the project develops and further consultation is conducted as necessary to fully review the potential impact on groups that share protected characteristics. A further revision of the document will consider the result of the consultation supporting a decision to implement the revised parking charges.

Our Corporate Plan for Croydon 2018-2022 sets out a number of priorities that are aimed at improving the environment we live in, and aim to make it more sustainable, to encourage and support health live. The key priorities directly or indirectly linked to parking charges include:

- An excellent transport network that is safe, reliable and accessible to all – by recognising the important link between transport and a sustainable environment and working collaboratively and undertaking informed decisions that are innovative based on the needs of a neighbourhood, for example, to encourage fewer short car journeys and reduce traffic congestion.
- A cleaner and more sustainable environment – by addressing air quality with the work we do, such as to help improve air quality and reduce congestion.
- Happy, healthy and independent lives – by preventing issues from becoming a problem and having an environment that encourages and supports healthy living.

Air pollution is an important and increasingly more high profile public health issue, contributing to illness and shortened life expectancy. It disproportionately impacts on the most vulnerable in the population, in particular the sick, young and elderly. Those at higher risk include those with existing respiratory problems and chronic illnesses such as asthma and chronic obstructive pulmonary disease. People who live or work near busy roads are at particularly high risk of exposure to the health harms of air pollution.

There are many national & regional strategies that have been introduced to improve air pollution and reduce emissions over recent years and months to help improve the public's health.

On 08 July 2019, Cabinet resolved to recommend that Council (on 15 July 2019) declare a 'Climate Emergency' and note the need for urgent action at an international, national and local level.

The proposal is to revise parking charges for the borough, aimed at contributing to a reduction in vehicles use and emissions that will help address public health priorities, the impact of vehicle emissions and congestion on air quality, the need for a shift to more active and sustainable transport modes, and the growing demand for kerbside space.

In the context of all the above, it is clear that the parking charges can play an important role in helping to achieve Croydon's Corporate outcomes. As the borough grows in population and density the aim is to improve the environment by delivering actions that will encourage and enable a lesser reliance on cars, a change to lower emitting vehicles and better management of the demand on the kerbside.

1. Equality Act 2010

Section 149 of the Equality Act 2010 sets out the Council's public sector equality duty (PSED). It provides as follows:

1.1 A public authority must, in the exercise of its functions, have due regard to the need to:

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

1.2 Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—

- (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

1.3 The steps involved in meeting the needs of disabled persons include, steps to take account of disabled persons' needs.

1.4 Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not involves having due regard, in particular, to the need to—

- (a) tackle prejudice, and
- (b) promote understanding.

1.5 Compliance with the duties in section 149 may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

1.6 The relevant protected characteristics are—

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

2 Prior engagement on Parking Policy 2019-2022

The analysis of the engagement response to the then draft Parking Policy in April 2019 showed that 142 out of the total 183 respondents completed one or more of the equalities questions. Of these 135 responded to age questions, 136 to disability, 134 to gender and 130 to ethnicity. Emission-based parking permit charges were specifically described within both the then draft Parking Policy, the associated Cabinet report and the Get Involved survey site for the engagement.

The then draft Parking Policy described 6 policy sections, of which Section 2 on Parking Management and Section 5 on Parking charges are particularly relevant to the present document. Responses to Section 2 of the policy reflected some elevated level of concern from the protected groups of Disability and Age. These relate to respondents saying there are not enough disabled bays; not enough is being done to curb illegal parking; and a concern that Electric Vehicle Charging Points (EVCPs) may infringe on pavement space. All of these concerns are recognised and will be addressed in the policy. Responses to Section 5 showed some elevated level of concern amongst the disabled group for parking charges. The feedback received to the then draft Parking Policy were addressed by action points on the actions plan section of the Equalities Analysis and incorporated into the final policy implemented from 7th August 2019.

3 Prior consultation on Emission-based parking permit charges

This prior consultation refers to the Phase 1 and 2 of the emission-based parking charges, which were implemented on 1 September 2019 and 1 April 2020 respectively. Phase 1 and 2 were concerned with parking permits. Phase 3 is now concerned with on-street Pay & Display (P&D) destination parking charges. The previous statutory consultation has directly transferable elements. The analysis of the

statutory consultation on the emission-based parking permit charges (which closed on 20th June 2019) found that 154 of 1,149 respondents (13%) were concerned that the emission-based charges could be unfair to those who cannot afford a newer car, which includes the poorest, elderly and vulnerable. Several respondents detailed example personal circumstances. The following considerations were made and reflected in the key decision report:

- 3.1 In relation to the PSED compliance and any potential concerns of a disproportional impact on vulnerable car owners/drivers and those least able to fund a newer car, the following protected characteristics are identified in the Equalities Analysis as most relevant in relation to the proposal:
- Disability.
 - Age.
 - Pregnancy and maternity.

Section 3.4 describes how each of the above groups may be impacted, and mitigations for such impacts are detailed over sections 3.5 – 3.8 below.

- 3.2 The 1,149 respondents to the consultation did not raise any concerns from other protected groups. Other protected characteristics, as per Equality Act 2010 section 149(7), are considered to be less impacted by emission-based parking charges, and these include gender reassignment, race, religion or belief, sex and sexual orientation.

- 3.3 It is considered that the Council's fulfilment of the PSED duty is promoted by measures detailed under the following categories:

1. Addressing poor air quality and disproportionate impact on the more vulnerable residents.
2. Accessibility to the process of paying for parking – i.e. usability of payment machines/mechanisms/methods etc.
3. Cost/charge for parking a car.
4. Unavailability of space to park a car, for people with (physical or mental) mobility impairment for whom the car is essential.

Addressing poor air quality and its disproportionate impact on the more vulnerable residents

- 3.4 Air pollution is of increasingly higher importance as a public health issue. Air pollution contributes to illness and shortened life expectancy. It disproportionately impacts on the most vulnerable in the population, in particular the sick, young and elderly. Those at higher risk include those with respiratory problems and chronic illnesses such as asthma and chronic obstructive pulmonary disease. People who live or work near busy roads are at particularly high risk of exposure to the health harms of air pollution. Figure 1 shows how the majority of highly polluted areas are situated within CPZs (zones that have P&D parking charges).

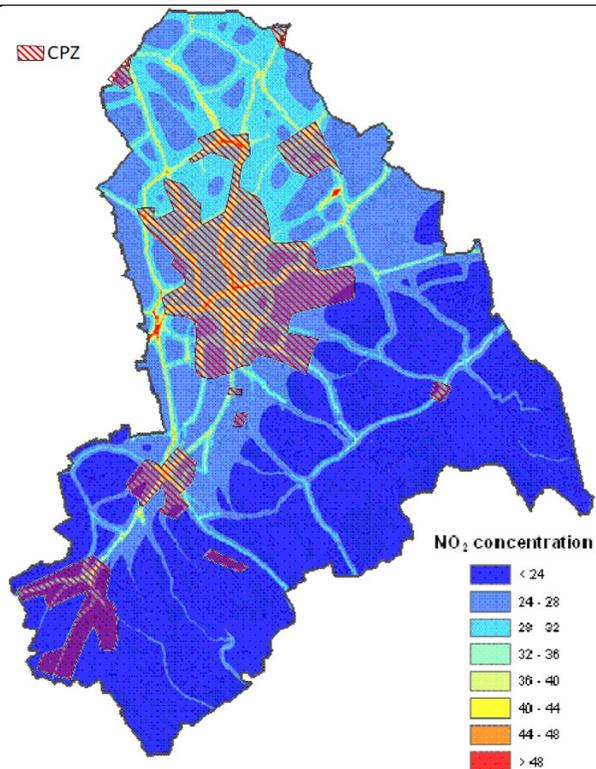


Figure 1 – CPZ P&D areas overlapped with predicted areas of Croydon breaching annual average nitrogen dioxide air quality objective (40µg/m³) in 2015.
 (source: *Air Quality Action Plan, 2017*)

There is a also disproportionally high overlap between the P&D parking bays areas and poor living environment, of which air quality is a significant factor (see Figure 2). The CPZ P&D bays coincide disproportionally with the areas of elevated risk of premature death and the impairment of quality of life due to poor health.

The Director for Public Health's Annual Report 2017 highlights that Croydon has the highest rate of hospital admissions for childhood (0-9 years) asthma and the third highest number of asthma deaths in London. The population density of children aged under 4 is disproportionally higher within the CPZ P&D areas, in particular in the North zones.

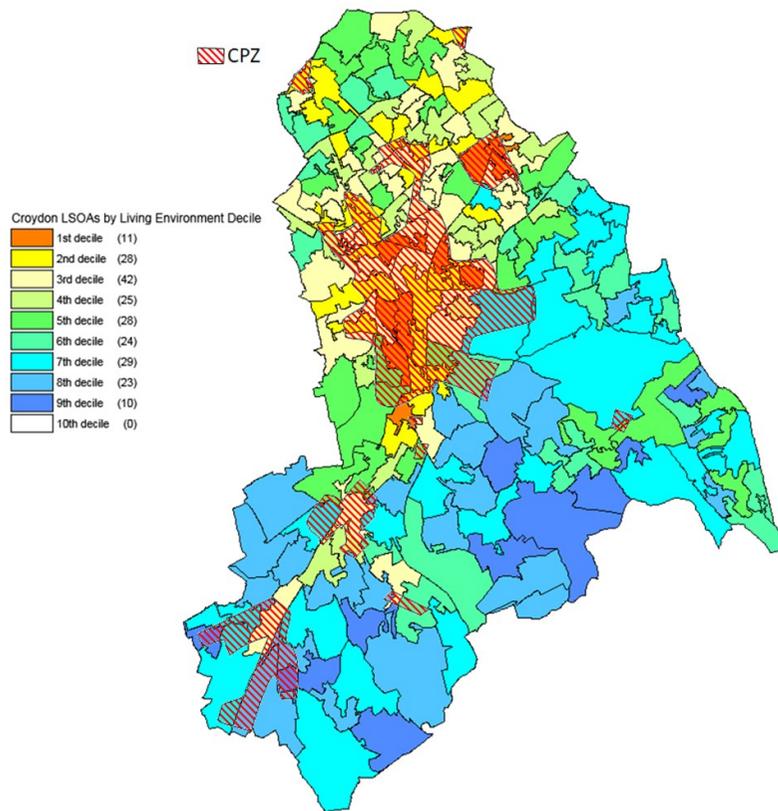


Figure 2 – CPZ P&D areas overlapped with the living environment domain, looking at both the indoor living environment and the outdoor living environment, including air quality.
(source: www.croydonobservatory.org)

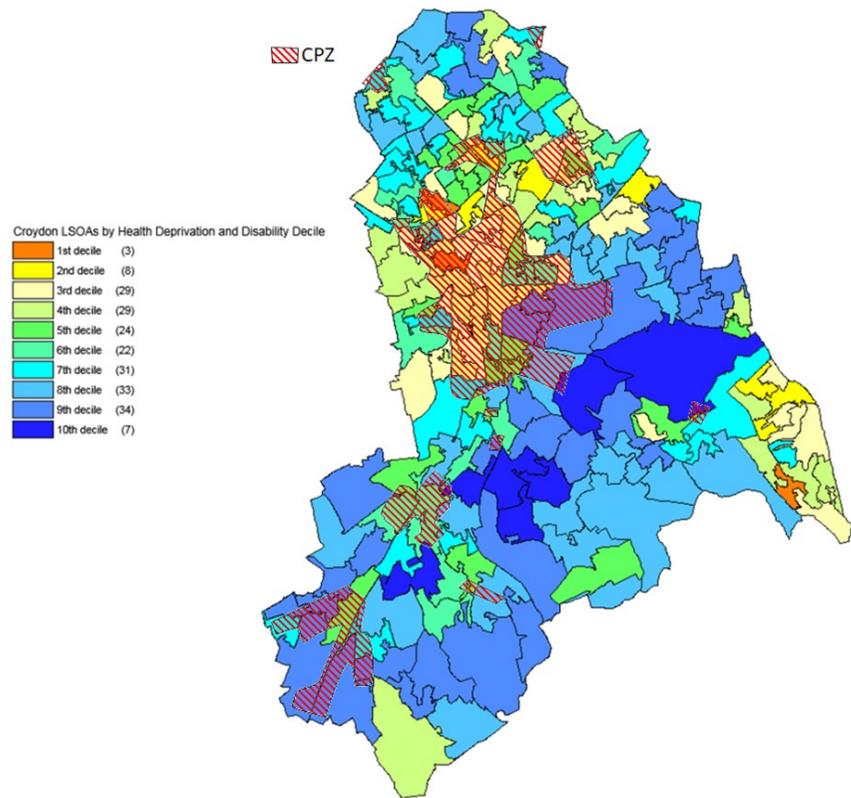
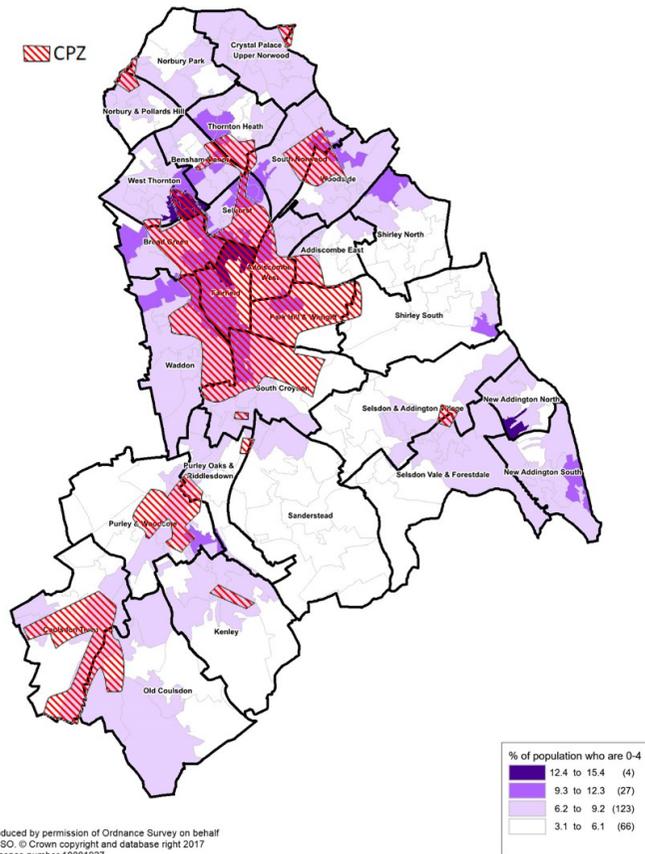


Figure 3 – CPZ P&D areas overlapped with health deprivation and disability, based on the risk of premature death and the impairment of quality of life due to poor mental or physical health.
(source: www.croydonobservatory.org)

% of population who are 0-4
2016 Mid Year Estimates



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Figure 4 – CPZ P&D areas overlapped with density 0 - 4 year olds.
(source: www.croydonobservatory.org)

205 premature deaths each year in Croydon are attributed to air pollution and it mainly affects the vulnerable. By comparison, to put the public health issue into perspective, 493 deaths in 2008 were attributed to smoking. [source: Croydon Health And Wellbeing Board, Joint health and wellbeing strategy 2013-2018].

In Croydon an Air Quality Management Area (AQMA) has been declared for the whole of the borough, for failing to meet the EU annual average limit for air pollutants. The national Clean Air Strategy 2019 and the London Mayor's Strategy require actions to reduce NOx and particulate matter emissions mainly at a local level. These actions are required to start showing results by 2021. If parking charges were to be maintained at a lower level, then it is considered unlikely to influence a sufficient number of owners in their next car choices

or indeed choices to have two or more non-essential vehicles and this in turn would impact negatively on the overarching objectives. Residents and local businesses for whom parking and road congestion have adverse economic and quality of life implications include people who cannot immediately afford to replace their older cars.

Active encouragement of lower emission vehicles and the underlying reduction in car use, benefits all individuals at risk of respiratory illnesses and exacerbation. It would enable persons from all protected groups to breathe cleaner and safer air. This can help improve the ability of certain protected groups to travel and participate where participation is currently disproportionately low as stated in the Equality Act 2010 as a Public sector equality duty.

Accessibility to the process of paying for parking

- 3.5 The proposal does not alter the present process for paying for parking, which is well evolved and is demonstrated to be accessible over at least a decade. The emission-charge calculation is automated upon entering the vehicle's registration number as is already required upon registering with the present Mobile Pay system. It should be noted that disabled Blue Badge holders, which counts 11,459 individual and 71 organisational blue badges holders in Croydon, are exempt from having to use process of paying for parking charges in public parking places.

Cost/charge for parking a car

- 3.6 CPZ P&D locations represent the roads with high demand for parking spaces and have been introduced to better manage the availability of kerb-space for residents and visitors. Parking charges are set as a means to help achieve this.
- 3.7 All 11,459 individual and 71 organisational blue badges holders in Croydon are exempt from the proposed parking charges. Free-of-charge disabled Companion Badges, for those who support a person with a Blue Badge, are also exempt from parking charges.
- 3.8 Some essential drivers, who do not necessarily have a disabled Blue Badge and are not automatically eligible for free parking, but do have a threshold mobility impairment, have access to Personal Independence Payment (PIP), which is a benefit that helps with the extra costs of a long-term health conditions for people aged 16 to 64. The PIP, or DLA, motoring allowance is currently £61.20 per week (£68.35 for war pensioners), as help with extra costs that are faced as result of disabilities and is to cover the cost of a Motability lease agreement for an essential vehicle (or powered wheelchair/scooter).

With regards to persons with protected characteristics who are not eligible for a disabled blue badge or a motoring PIP, which includes the scenario of someone who must obtain and use a car as direct consequence of advanced age, pregnancy or maternity, the parking charges will remain a relatively modest element of the typical c.£2,000 to £4,000 total yearly cost of car ownership (www.motoringresearch.com/car-news/average-car-costs-a-month). Compared to all other associated costs of owning a car, parking charges would be a minimal percentage of the overall cost. It should be remembered that workplaces have a duty to secure access for

protected groups with mobility impairment. The proposed charges do not therefore significantly reduce the opportunities for persons who share protected characteristics and who are ineligible for a disabled blue badge.

- 3.9 The proposed revised charges are significantly reduced for lowest emission vehicles, meaning that for those who select a lowest emission car at their next choice, including those with protected characteristics who are ineligible for free parking, have opportunity to reduce their parking expenses.
- 3.10 With regards to maternity: Where a child has a special transport needs then they would typically be entitled to a blue badge, making the parent's car eligible for a companion badge, which exempts the parent's car from parking charges both at home and at destinations within Croydon.

The top 20% on higher income have higher car ownership and uses the car more than twice as much as the 20% on lowest income. [source: <https://www.gov.uk/government/statistical-data-sets/nts07-car-ownership-and-access>]. Car ownership and use impacts on air quality and public realm for those who walk. Although income is not protected characteristic, there is nonetheless a correlation between low income and health deprivation. Inappropriately low parking charges in effect disproportionately benefits the higher income section of the population, at the expense of the public health impacts from air pollution and a degraded living environments of those on lower income – who tends to be more deprived of health.

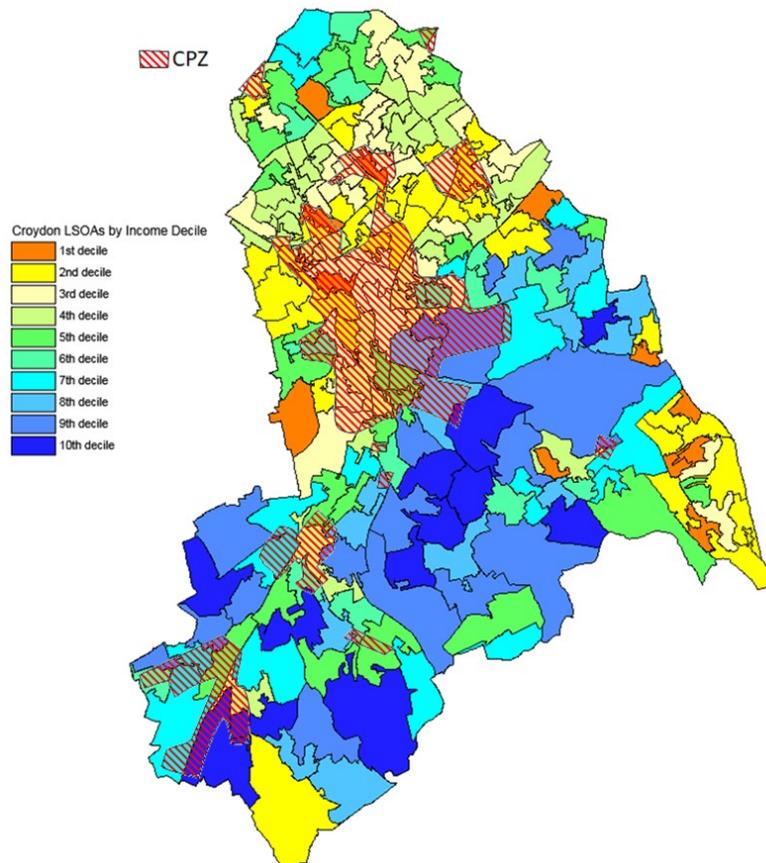


Figure 5 – CPZ P&D areas overlapped with income domain, looking at the proportion of the population who are either out of work or who have low earnings. The orange areas are in the top 10% most deprived areas in the country and together make up 5% of the total areas in the borough. Majority of orange areas are outside the CPZ, with the noticeable exceptions of the North Zone CPZ in Broad Green and Thornton Heath.

(source: www.croydonobservatory.org)

Figure 5 shows that although some CPZ areas overlap with low income domains, this is not the case for all CPZ areas. An estimation based on Figure 5 is that about a third of low income domains are within CPZ P&D areas.

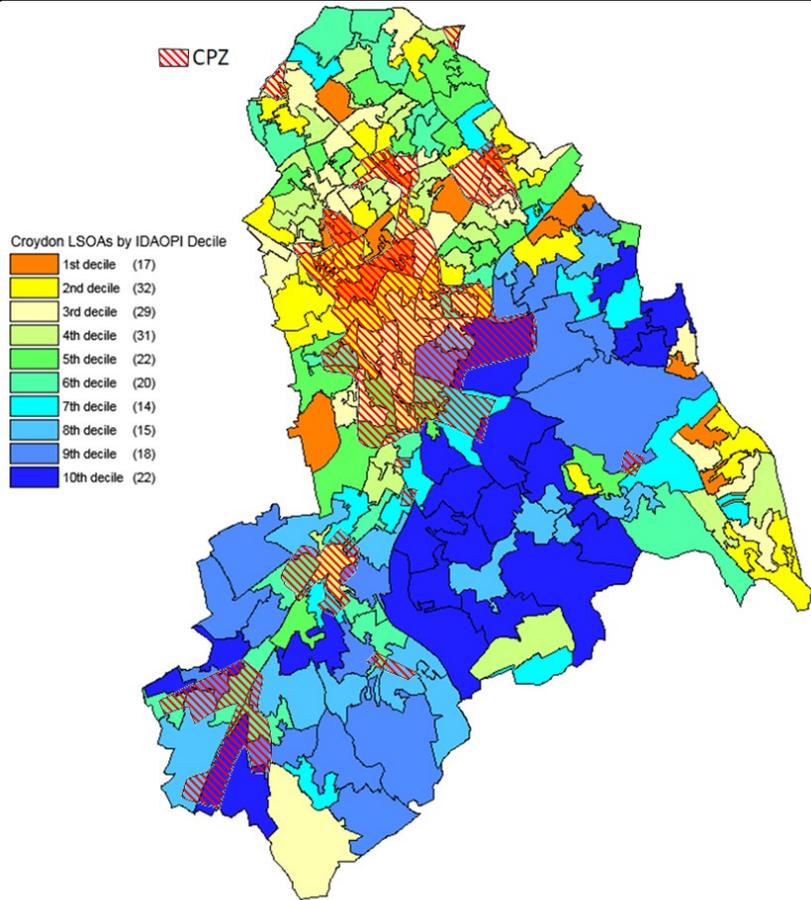
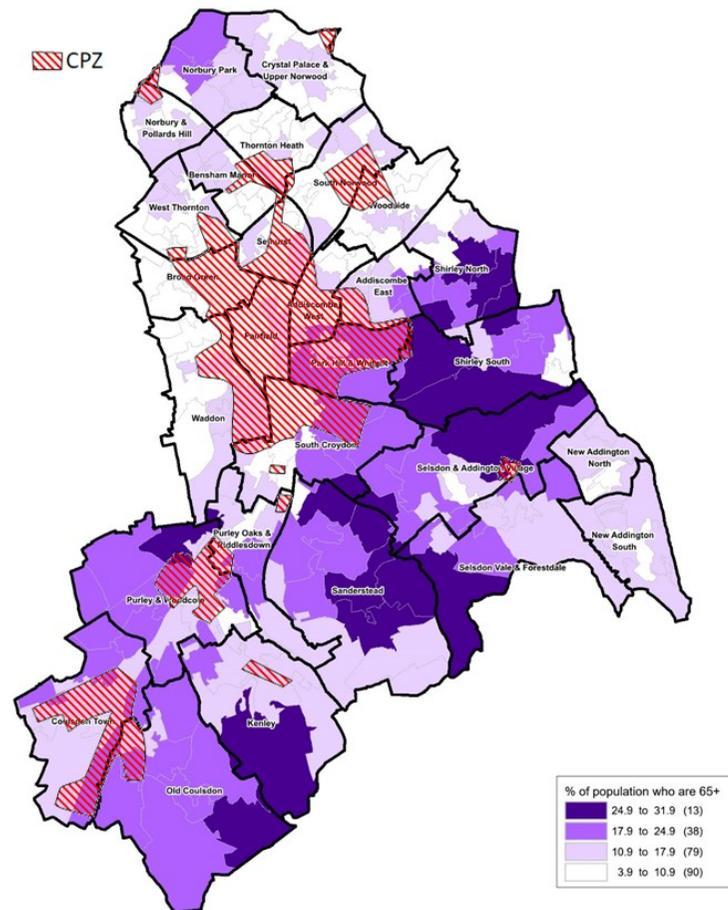


Figure 6 – CPZ P&D areas overlapped with income deprivation amongst the over 60-year olds.
 (source: www.croydonobservatory.org)

**% of population who are 65+
2016 Mid Year Estimates**



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Figure 7 – CPZ P&D areas overlapped with density of over 65-year olds.
(source: www.croydonobservatory.org)

In Croydon 17% of older people are considered to be income deprived (source: www.croydonobservatory.org). Figure 6 indicates that older people living in CPZ P&D areas are disproportionately deprived. Figure 7, however, indicates that the older population is significantly lower within the CPZ P&D areas.

In context of the 160,000 vehicles registered in Croydon, the higher parking charges band accounts for about 19,000 vehicles in the highest emission group (i.e. the 12% most polluting cars) and about 6,000 that predate Mar 2001 (i.e. c.3.7% designed prior to tighter emission standards being introduced). These vehicles are owned by residents across the whole income spectrum. Proportionally, the higher charge will apply to a very small number of residents on low income. Although low income may be the consequence of a protected characteristic, low income in itself is not a protected characteristics. A resident with a threshold mobility impairment, including if driving a high polluting or older car, will be eligible for a disabled Blue Badge and free parking.

Unavailability of space for parking a car in a CPZ

- 3.11 Car ownership in Croydon has increased by 40% in the last 2 decades and is forecast to continually grow at 2% each year – when assuming no intervention. This has meant that there is an increasing pressure on over-subscribed parking spaces and vehicle drivers have become desensitised to the charges applied, hence reducing the effectiveness of charges to manage demand. The current charges are deemed too low for achieving the parking demand management objectives. This is evident from the Parking Policy engagement where many who declared a disability stated it is too difficult to find a parking space near to home. The recent Covid-19 lockdown situation, with more drivers staying at home, created an overwhelming access problem – where some residents had to park many roads away from their homes, in places where they inadvertently impeded residents in these other areas.

Influencing the overall number of non-essential cars parked on the roads in the borough, and in parking congested CPZ P&D in particular, can help improve access for all protected groups with essential car needs, hence improve their ability to travel and participate and thereby advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share such characteristics thus supporting the Council's public Sector equality duty.

4 Summary

- 4.1 There is no evidenced information that the emissions-based and increased parking permit charges will have a disproportionate impact on people with protected characteristics (as covered by the Equality Act).
- 4.2 Whilst those on lower incomes will not be in a position to replace an older higher-polluting car with a new cleaner one, being on a low income is not alone a protected characteristic. Those with mobility relevant characteristics are generally exempt from parking charges.
- 4.3 In the context of car parking in P&D zones and the proposed emission-based parking permit charges, the Equalities Assessment concludes that there are no adverse PSED impacts as a result of this decision. One of the main purposes of the decision is to support the health and wellbeing of residents of the borough with a particular focus on those most susceptible to air pollution. The majority of P&D zones are located in areas more affected by pollution, as detailed below, and therefore impact on areas to which the proposed emission based charges will apply. As such, it is considered that the proposed decision has a positive impact on the duty to seek to

eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act. In addition, as many of the areas most affected by pollution are those which correspond with areas of deprivation in the borough and the majority of P&D zones are similarly located in those areas this decision will seek to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it and afford a better air quality and level of health across more areas of the borough. The Equalities assessment also concludes that this decision will not have any adverse impact on the fostering of good relations between persons who share a relevant protected characteristic and persons who do not share it.

- 4.4 It is not considered that the proposed charges significantly reduce the opportunities for persons who share protected characteristics and who are not eligible for a disabled blue badge. The proposal on balance helps to reduce inequality for those persons who share protected characteristics, in particular for those who are vulnerable to air pollution and who have difficulties accessing their homes and travelling to other destinations, which disproportionately are the young, the elderly and those who live in some of the more deprived areas of the borough. The proposal in effect supports the Council in its duty under the Equality Act 2010.
- 4.5 The many respondents to the parking policy engagement (183) and the emission-based parking permit charges consultation (1,149) have not suggested any alternative solution, which could sufficiently address equality and air quality objectives, without the introduction of a parking charges differential.
- 4.6 Surplus from parking income is ring-fenced and, for example, contribute significantly to sustaining public transport fare concessions such as the Freedom Pass scheme for the elderly. The parking charges therefore indirectly, and incidentally, support the portion of the elder population that do not have a car or who choose to use public transport.
- 4.7 The emission-based parking charges will effectively address inequality issues, by helping to encourage a gradual switch to lesser polluting cars and also help influence the choices of those who are able to give up a non-essential car.

3. Impact of the proposed change

Important Note: It is necessary to determine how each of the protected groups could be impacted by the proposed change. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

3.1 Additional information needed to determine impact of proposed change

Table 1 – Additional information needed to determine impact of proposed change

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table.		
Additional information needed	Information source	Date for completion

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

3.2 Deciding whether the potential impact is positive or negative

Table 2 – Positive/Negative impact

For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. . If it is decided that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.			
Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	<p>Improvement in air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures.</p> <p>Surplus from parking charges are ring-fenced and, for example, contribute significantly to sustaining public transport fare concessions such as the Freedom Pass scheme for the elderly. The parking permit charges therefore indirectly supports the portion of the elder population that do not have a car or who choose to use public transport.</p>	<p>Impact for older age group due to frailty and reliance on car travel and parking. This risk is mitigated by implementing measures to exempt such people and this will be consulted upon before a final decision on the revised parking charges is reached.</p> <p>Overall we expect the positive impact of the policy to outweigh the negative impact due to a reduction in air pollution in a person's health.</p>	Air Quality Action Plan 2017-22

	<p>Air pollution contributes to illness and shortened life expectancy. It disproportionately impacts on the most vulnerable in the population, in particular the sick, young and elderly</p> <p>Public Health (NHS) data shows that Croydon currently have the highest rate of hospital admissions for childhood (0-9 years) asthma in London. 7.5% (205) of premature deaths in Croydon are linked to air pollution. Failing to address NOx and particulate matter emissions in Croydon would deprive many local people of their fundamental right to safe air.</p>		
Disability	<p>Improvement in air quality and reduced exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures.</p> <p>All 11,459 individual and 71 organisational blue badges holders in Croydon are exempt from the proposed parking charges. Free-of-charge disabled Companion Badges, for those who support a person with a Blue Badge, are also exempt from parking charges.</p> <p>Reduction in non-essential car ownership and use (i.e. less driving to the shop) can potentially enhance accessibility for essential car users.</p>	<p>Potential negative impact on people with disabilities &/or long term health conditions. This is mitigated by implementing measures to exempt such people and this will be consulted upon before a final decision on the revised parking charges is reached.</p> <p>Overall we expect the positive impact of the policy to outweigh the negative impact due to a reduction in air pollution in a person's health.</p>	<p>Air Quality Action Plan 2017-22</p> <p>Blue Badge Scheme</p> <p>Croydon Observatory</p> <p>Disabled Parking Accreditation scheme, in association with Disabled Motoring UK.</p>
Gender	<p>Improvement in air quality and reduced exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures.</p>		<p>Air Quality Action Plan 2017-22</p>

Gender Reassignment	Improvement in air quality and reduced exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures.		Air Quality Action Plan 2017-22
Marriage or Civil Partnership	Improvement in air quality and reduced exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures.		Air Quality Action Plan 2017-22
Religion or belief	Improvement in air quality and reduced exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures.		Air Quality Action Plan 2017-22
Race	Improvement in air quality and reduced exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures.		Air Quality Action Plan 2017-22
Sexual Orientation	Improvement in air quality and reduced exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures.		Air Quality Action Plan 2017-22
Pregnancy or Maternity	Improvement in air quality and reduced exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for	Potential negative impact during latter stages of pregnancy, where for a period the car can become more essential for travel.	Air Quality Action Plan 2017-22

	<p>all residents and visitors by implementing parking related measures.</p> <p>Air pollution inside a car in congested traffic is higher than on the pavement. The impact of air pollution on the unborn child, during earlier stages of pregnancy, must also be considered. Reductions in car dependency and air pollution are positive contributions.</p>	<p>The temporary nature of the later stage of pregnancy makes it unlikely that increased parking charges, in context of overall car ownership costs, would result in financial hardship and substantially additional reduction in ability to participate in public life.</p> <p>With regards to maternity: Where a child has a special transport needs then they would typically be entitled to a blue badge, making the parent's car eligible for a companion badge, which exempts the parent's car from parking charges both at home and at destinations within Croydon.</p> <p>This will be consulted upon before a final decision on the revised parking charges is reached.</p> <p>Overall we expect the positive impact of the policy to outweigh the negative impact due to a reduction in air pollution in a person's health.</p>	
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Important note: You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics.

3.3 Impact scores

Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)

- Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact)
- Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

Table 4 – Equality Impact Score

Severity of Impact	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	Likelihood of Impact			

Key

Risk Index	Risk Magnitude
6 – 9	High
3 – 5	Medium
1 – 3	Low

Table 5 – Impact scores

<p>Column 1</p> <p>PROTECTED GROUP</p>	<p>Column 2</p> <p>LIKELIHOOD OF IMPACT SCORE</p> <p>Use the key below to score the likelihood of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p>	<p>Column 3</p> <p>SEVERITY OF IMPACT SCORE</p> <p>Use the key below to score the severity of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p>	<p>Column 4</p> <p>EQUALITY IMPACT SCORE</p> <p>Calculate the equality impact score for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group.</p> <p>Equality impact score = likelihood of impact score x severity of impact score.</p>
Age	2	1	2
Disability	2	2	4
Gender	1	1	1
Gender reassignment	1	1	1
Marriage / Civil Partnership	1	1	1
Race	1	1	1
Religion or belief	1	1	1
Sexual Orientation	1	1	1
Pregnancy or Maternity	1	2	2

4. Statutory duties

4.1 Public Sector Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council's ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

Advancing equality of opportunity between people who belong to protected groups

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups

Important note: If the proposed change adversely impacts the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

5. Action Plan to mitigate negative impacts of proposed change

Table 5 – Action Plan to mitigate negative impacts

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.				
Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Age	Potential financial impact for older age group due to frailty, who relies on the car for travel and access.	Frailty is an eligibility criteria for a Blue Badge. This includes those without capacity to drive, for use by relatives and other in their support network carrying them as passengers. Surplus from parking charges are ring-fenced and, for example, contribute significantly to sustaining public transport fare concessions such	Parking	Upon adoption of the proposed parking charges

		<p>as the Freedom Pass scheme for the elderly. The parking permit charges therefore indirectly supports the portion of the elder population that do not have a car or who choose to use public transport.</p> <p>Where a child has a special transport needs then they would typically be entitled to a Blue Badge, making the parent's car eligible for a companion badge, which exempts the parent's car from parking charges both at home and at destinations within Croydon.</p> <p>This will be consulted upon before a final decision on the revised parking charges is reached.</p>		
Disability	Potential financial impact on people with disabilities and/or long term health conditions, who relies on the car for travel and access.	<p>The holders of 11,459 individual and 71 organisational blue badges issued in Croydon are exempt from the parking charges. Eligibility is granted for both physical and mental (hidden) disabilities, which impairs mobility.</p> <p>The Blue Badge companion badge and certain non-vehicle specific charity badges for volunteers who visit and support vulnerable residents are exempt from parking charges.</p>	Parking	Upon adoption of the proposed parking charges

Equality Analysis

		<p>Additionally, some essential drivers with mobility impairment have access to Personal Independence Payment (PIP), which is a benefit that helps with the extra costs of a long-term health condition for people aged 16 to 64.</p> <p>This will be consulted upon before a final decision on the revised parking charges is reached.</p>		
Pregnancy or maternity	Potential financial negative impact during latter stages of pregnancy, where for a period the car can become more essential for travel.	<p>The temporary nature of the later stage of pregnancy makes it unlikely that increased parking charges, in context of overall car ownership costs, would result in financial hardship and substantially additional reduction in ability to participate in public life.</p> <p>Air pollution inside a car in congested traffic is higher than on the pavement. The impact of air pollution on the unborn child, during earlier stages of pregnancy, must also be considered. Reductions in car dependency and air pollution are positive contributions.</p> <p>Overall we expect the positive impact of the policy to outweigh the negative impact due to a reduction in air pollution in a person's health.</p>	Parking	Upon adoption of the proposed parking charges

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		This will be consulted upon before a final decision on the revised parking charges is reached.		
Race	None yet foreseen.	This will be consulted upon before a final decision on the revised parking charges is reached.		
Sex (gender)	None yet foreseen.	This will be consulted upon before a final decision on the revised parking charges is reached.		
Gender reassignment	None yet foreseen.	This will be consulted upon before a final decision on the revised parking charges is reached.		
Sexual orientation	None yet foreseen.	This will be consulted upon before a final decision on the revised parking charges is reached.		
Religion or belief	None yet foreseen.	This will be consulted upon before a final decision on the revised parking charges is reached.		
Marriage/civil partnership	None yet foreseen.	This will be consulted upon before a final decision on the revised parking charges is reached.		

6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter X in column 3 (Conclusion) alongside the relevant statement to show your conclusion.		
Decision	Definition	Conclusion - Mark 'X' below
No major change	<p>Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review.</p> <p>The prior analysis of the engagement and consultation results has found that no individual protected sub-group stands out as having responded negatively to the principles behind emission-based and increased parking charges – in terms of impact on their protected characteristics. There has been some elevated concern about insufficiency in the parking bays accessible for the disabled and that disabled drivers, with an essential car use need, may have to start paying for parking. These concerns are recognised and mitigated in the policy actions plan.</p> <p>Residents and local businesses for whom parking and road congestion have adverse economic and quality of life implications include people with protected characteristics and some who cannot immediately afford to replace their older cars. We must however also consider fairness to residents who are vulnerable to air pollution, which disproportionately are the young, the elderly and those who live in some of the poorest areas of the borough. They represent groups that tend to have lower car ownership.</p> <p>In context of the 160,000 vehicles registered in Croydon, the higher parking charges band accounts for about 19,000 vehicles in the highest emission group (i.e. the 12% most polluting cars) and about 6,000 that predate Mar 2001 (i.e. c.3.7% designed prior to tighter emission standards being introduced). These vehicles are owned by residents across the whole income spectrum. Proportionally, the higher charge will apply to a very small number of residents on low income. Although low income may be the consequence of a protected characteristic, low income in itself is not a protected characteristics. A resident with a threshold mobility impairment, including if driving a high polluting or older car, will be eligible for a disabled Blue Badge and free parking. The proposed charges can therefore not be generalised as having a disproportionate effect on residents with protected characteristics.</p>	X

Equality Analysis

	<p>Influencing the overall number of cars parked on the roads in the borough, and in parking congested P&D zones in particular, can help improve access for all protected groups with essential car needs, hence improve their ability to travel and participate where participation is currently disproportionately low.</p> <p>Active encouragement of lower emission vehicles and the underlying reduction in car use, benefits all individuals, families and neighbourhoods. Air pollution disproportionately impacts on the most vulnerable in the population, in particular the sick, young and elderly. Those at higher risk include those with existing respiratory problems and chronic illnesses such as asthma and chronic obstructive pulmonary disease.</p> <p>There is no evident information to suggest that the emissions based parking permit charges will have a disproportionate impact on people with protected characteristics (as covered by the Equality Act). Whilst those on lower incomes will not be in a position to replace their vehicles with new ones, being on a low income is not alone a protected characteristic.</p> <p>It is considered that the reasons for introducing emissions-based parking charges and a 20p/30min increase outweighs the reasons for not implementing them.</p> <p>This is an initial conclusion, which will be reviewed subject to a pending consultation inviting objections to the proposal and which will be re-considered before a final decision on the revised parking charges is reached.</p> <p>If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.</p>	
Adjust the proposed change	<p>The initial conclusion will be reviewed subject to a pending consultation inviting objections to the proposal and which will be re-considered before a final decision on the revised parking charges is reached. Our proposed change must be adjusted if the consultation identifies unacceptable adverse effects on one or more protected groups that are not justified and can be mitigated.</p> <p>If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form</p>	
Continue the proposed change	<p>The initial conclusion will be reviewed subject to a pending consultation inviting objections to the proposal and which will be re-considered before a final decision on the revised parking charges is reached. Our proposed change must be continued if the advantages outweigh the disadvantages and do not lead to unlawful discrimination. In such case we will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change.</p>	

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	<p>However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned.</p> <p>If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.</p>	
Stop or amend the proposed change	The initial conclusion will be reviewed subject to a pending consultation inviting objections to the proposal and which will be re-considered before a final decision on the revised parking charges is reached. Our proposed change must be stopped if the consultation identifies unlawful discrimination or otherwise unacceptable adverse effects on one or more protected groups that are not justified and cannot be mitigated.	
Will this decision be considered at a scheduled meeting? Traffic Management Advisory Committee	<p>Meeting title: Parking charges review January 2021</p> <p>Date: 14 October 2020</p>	

Supporting Documents:

1. Cabinet report on parking policy and emission-base parking charges, 25 March 2019:
<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=183&MId=1553&Ver=4> (item 28/19)
2. TMAC report on the outcome of consultation on emission-based parking permit charges, 24 July 2020:
<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=173&MId=2065&Ver=4> (item 4/19)
3. Scrutiny call-in report on the decision to implement emission-based parking permit charges, 2 September 2019:
<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=166&MId=2086&Ver=4>

7. Sign-Off

Equality Analysis

Officers that must approve this decision			
Equality lead	Name:	Yvonne Okiyo	Date: 09.09.2020
	Position:	Equalities Manager	
Director	Name:	Steve Iles	Date: 09.09.2020
	Position:	Director of Public Realm, Place	