

Everyone different, everyone matters



Equality & Community Cohesion Impact Assessment (EIA)

Directorate: Public Services Service Area: Parking Services	Lead Officer: Debbie Harrison Date completed: June 2023
Service / Policy / Function or Procedure to be assessed: Parking Charges - managing demand and protecting the environment	
Is this: New / Proposed <input type="checkbox"/> Existing/Review <input checked="" type="checkbox"/> Changing <input type="checkbox"/> (Please tick appropriate box)	Review date: May 2023

Part A - Initial Assessment to determine if a full Impact Assessment is required

What are the aims and objectives/purpose of this service, policy, function or procedure?

The Council provides a range of parking facilities throughout Calderdale, which includes on-street and off-street parking.

The provision of parking is a service which supports access to facilities and services in our towns for residents, workers, shoppers and other visitors, along with supporting the wider local economy and regeneration.

The proposals outlined in this report support the Climate Emergency that was declared in 2019 and other wider supporting strategies that have been developed, which include the recently adopted Parking Strategy and Air Quality Strategy, together with ongoing Transportation initiatives to encourage active travel. These strategies all recognise the importance of good parking management and charging policy in positively influencing travel behaviour

Parking management plays a key role in terms of ensuring accessibility to towns and district centres, influencing the choice of travel modes, and encouraging active travel. It is a crucial component of an integrated transport strategy. There is a need to encourage a modal shift in how people choose to travel but this needs to be supported by appropriate parking measures that encourage and ensure a turnover of space.

The changes will see both an increase and decrease in charges, with the aim of consistency across the borough whilst balancing the needs of each town/area. The review of parking charges across all towns has focused on encouraging maximum availability through the turnover of space.

Summary of Changes

1. Premium Spaces will see an increase in the hourly charge to encourage different choices in travel and reflect demand
2. A more competitive lower rate is proposed in some areas, both in recognition of the cost of living crisis and a desire to encourage motorists to park in the outlying areas.
3. Some new on street charges will be introduced to further manage spaces within some town centres with excess demand.
4. A new permit type is proposed, which is heavily discounted, to encourage uptake of 100% electric vehicles.

For specific details see report Appendix 1, 3 & 4.

Please indicate its relevance to equality by selecting yes or no

	Yes	No
Eliminating unlawful discrimination, victimisation and harassment	X	
Advancing equality of opportunity	X	
Fostering good community relations	X	

If not relevant and this is agreed by your Head of Service, the Impact Assessment is now complete - please send a copy to your Directorate Equality Champion & to the Cohesion and Equality Team. **If relevant**, a full Impact Assessment needs to be undertaken (PART B below).

PART B: Full Impact Assessment

Step 1 – Identifying outcomes and delivery mechanisms (in relation to what you are assessing)

What outcomes are sought and for whom?	<p>Under the Traffic Management Act 2004 and as a Highway Authority, Parking Services needs to ensure that on-street parking bays are being managed in the most efficient way, ensuring that the spaces turn over and any proposed charges are sensible and sensitive to the locality, thereby supporting the local economy.</p> <p>The proposed charges will result in:</p> <ul style="list-style-type: none"> - Regular and improved turnover of parking spaces to ensure better access and more parking opportunities for people visiting the town centre. - More opportunity to park where and when people want, to longer stay parking transferred to car parks rather than in high demand on-street parking places. - Increased modal shift and support for active travel. - Increased income to support essential Council services. - Continued security and safety of parking areas through regular and frequent patrols. <p>Those affected may include:</p>
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	<ul style="list-style-type: none"> - Residents, visitors and shoppers. - Businesses - employees and employers. - Users of leisure and other town centre facilities. - Bus companies and other transport providers. - Low income families. - Worshippers.
Are there any associated policies, functions, services or procedures?	<p>CMBC Equality and Diversity Policy Statement</p> <p>Road Traffic Act 1984</p> <p>Traffic Management Act 2004</p> <p>Traffic Regulation Orders/Parking Places Orders</p> <p>Parking Strategy</p> <p>Draft Air Quality Strategy</p>
How will this service be delivered? (e.g. direct service delivery, commissioned/outsourced etc)	<p>The implementation and monitoring of the proposed option will be carried out by officers in Parking Services and Highways and supported by Legal and Finance.</p> <p>Parking enforcement will continue to be carried out by APCOA in accordance with the current contract.</p>
If partners (including external partners) are involved in delivering the service, who are they?	<p>Calderdale Council manages Civil Parking Enforcement across the Borough. This is currently carried out by APCOA on behalf of the Council through a formal contract arrangement.</p>

Step 2 – What does the information you have collected, or that you have available, tell you?

What evidence/data already exists about the service and its users? (in terms of its impact on the 'equality strands', i.e. age, disability, gender identity, race, religion or belief, sex, sexual orientation, maternity/pregnancy, marriage/civil partnership and other socially excluded communities or groups) and **what does the data tell you?** e.g. are there any significant gaps?

The nature of Parking Services makes it difficult to collect equality information in a comprehensive and systematic way. However, information is available from a variety of other areas, for example:

- The Council holds basic information about Blue Badge holders and residents or members of the public who have parking permits. The Blue Badge Scheme is currently administered by the Welfare and Benefits team. Parking Services do not manage this information but do have access to the name, address, D.O.B and contact telephone number of the badge holder for the purposes of appeals and blue badge misuse.
- The Council holds equality information about its employees who have essential user parking permits.
- Information about how much the Council's long and short stay car parks and on street parking bays are used is based on the amount of money collected from machines, but it does not provide a breakdown of the users. There are clear trends dictated by user group, e.g. commuters tend to park in long stay car parks and shoppers/visitors tend to use the short stay and on-street parking facilities.
- The Council holds information about Penalty Charge Notices issues by contravention and by vehicle registration number, but this does not provide a breakdown of the users by group or equality.

Has there been any consultation with, or input from, service users, staff or other stakeholders? If so, with whom, how were they consulted and what did they say? If you haven't consulted yet and are intending to do so, please list which specific groups or communities you are going to consult with and when.

No formal consultation has been undertaken - however, there are statutory requirements in accordance with the Traffic Management Act for any change/amendments to a Traffic Regulation Order (TRO) and/or Parking Places Order (PPO) which are followed.

Are there any complaints, compliments, satisfaction surveys or customer feedback that could help inform this assessment? If yes, what do these tell you?

All customer complaints and compliments are recorded on the corporate system.

All complaints are investigated and, where appropriate, action is taken to mitigate any future occurrence for example, training, policy review etc.

With increasing demands on the highway network, peak time congestion, greater demand for parking spaces, and the current economic and environmental context, it is becoming increasingly necessary to effectively manage both on-street and off-street parking provision. Aspirations in relation to health and wellbeing, air quality, climate emergency and town centre vibrancy all place varying demands on car parking management strategy. Parking Services continue to work with colleagues across a wide range of directorates and services to determine effective measures and approaches.

A major review of parking in Calderdale was undertaken in 2008 which was detailed in the report: *Parking Review – Report of the Regeneration and Development Scrutiny Panel July 2009*.

The review was comprehensive and set out an overall parking policy for the Council, taking into consideration regional and national policy. Policy recommendations were made and work streams were identified to achieve recommended outcomes for the following areas:

- Corporate
- Charging
- Quality and quantity of provision
- Enforcement and control
- Accessibility
- Residents' parking
- Permits
- Other vehicles
- Events management

Several parking studies have been undertaken over recent years by the wider Transportation team as part of other work streams. The findings in these studies have been taken into account in the development of a Parking Strategy which was adopted in October 2022, and which sits alongside a new Air Quality Strategy. Further reviews are to be undertaken, as outlined in the Strategy.

Step 3 – Identifying the impact

a. Is there any impact on individuals or groups in the community?

(think about age, disability, gender identity, race, religion or belief, sex, sexual orientation, maternity/pregnancy, marriage/civil partnership and other socially excluded communities or groups)

Barriers:

What are the potential or known barriers/impacts for the different 'equality strands' set out below? Consider:

- **Where** you provide your service, e.g. the facilities/premises;
- **Who** provides it, e.g. are staff trained and representative of the local population/users?
- **How** it is provided, e.g. do people come to you or do you go to them? Do any rules or requirements prevent certain people accessing the service?
- **When** it is provided, e.g. opening hours?
- **What** is provided, e.g. does the service meet everyone's needs? How do you know?

* Some barriers are justified, e.g. for health or safety reasons, or might actually be designed to promote equality, e.g. single sex swimming/exercise sessions, or cannot be removed without excessive cost. If you believe any of the barriers identified to be justified then please indicate which they are and why.

Solutions:

What can be done to minimise or remove these barriers to make sure everyone has equal access to the service or to reduce adverse impact? Consider:

- Other arrangements that can be made to ensure people's diverse needs are met;
- How your actions might help to promote good relations between communities;
- How you might prevent any unintentional future discrimination.

	Barriers/Impacts identified	Solutions (ways in which you could mitigate the impact)
Age (including children, young people and older people)	<p>These proposed changes would not adversely affect any particular age group.</p> <p>The implementation of the proposed option will have a potential positive impact on those who are infirm/less mobile and parents/carers with young children as it will ensuring the spaces turn over more frequently and therefore make it easier to park closer to shops and leisure destinations.</p>	N/A
Disability (including carers)	There are no changes proposed to the Blue Badge system and use of blue badges, and it should be	N/A

	<p>noted that the eligibility criteria for badges changed in 2019 and now supports those with hidden disabilities.</p> <p>It is not envisaged that there will be any additional barriers related to the parking proposals. The Blue Badge concession currently allows free and unlimited parking in the pay and display bays affected by these proposals. Where a Blue Badge is not held or used, all ticket machines are DDA compliant and there is also payment via a mobile app or phone is available.</p> <p>Provision of dedicated disabled parking bays will continue to be based on national guidance for the introduction of any new on and off-street parking proposals.</p> <p>Provision at existing car parks and on-street locations is not affected.</p> <p>All transport/parking related projects across town centres take account and consider disabled spaces and locations as part of any wider changes.</p>	
Race (including Gypsies & Travellers and Asylum Seekers)	There are no changes proposed that are considered to adversely impact on race.	N/A
Religion or Belief (including people of no religion or belief)	<p>There are no changes proposed that are considered to adversely impact on religion/belief.</p> <p>No new charges are being introduced to areas that may affect religion/belief.</p> <p>The long stay (all day) parking in Halifax, Todmorden, Sowerby Bridge, Elland and Brighouse is remaining free and unrestricted on Sundays, and</p>	N/A

	most other places of worship have sufficient private space or access to free on street parking.	
Gender Re-assignment (those that are going through transition: male to female or female to male)	There are no changes proposed that are considered to adversely impact on gender.	N/A
Pregnancy and Maternity	The implementation of the proposed options will have a potential positive impact on pregnancy and maternity as it will allow enforcement to ensure spaces turn over more frequently and therefore make it easier for pregnant women and carers to park closer to shops and destinations.	N/A
Sex (either male or female and including impact on men and women)	There are no changes proposed that are considered to adversely impact on sex.	N/A
Sexual orientation (including gay, lesbian, bisexual and heterosexual)	There are no changes proposed that are considered to adversely impact on sexual orientation.	N/A

b. Is there/will there be any impact on staff?

(think about the diversity of the workforce delivering the service and relevant training and development needs)

Employee Characteristic	Barriers/Impacts identified	Solutions (ways in which you could mitigate the impact)
Age	No impact on Council staff as parking enforcement will be carried out by APCOA in accordance with the current contract.	
Disability		
Gender reassignment		
Pregnancy & Maternity		
Marriage and Civil Partnership		
Race		

Religion or Belief	
Sex	
Sexual Orientation	

Step 4 – Changes or mitigating actions proposed or adopted

Having undertaken the assessment are there any changes necessary to the existing service, policy, function or procedure? What changes or mitigating actions are proposed?

No changes have been identified.

Step 5 – Monitoring

How are you going to monitor the existing service, policy, function or procedure?

In accordance with the resolution of Cabinet in December 2016, Parking Services undertakes a bi-annual review of charges. The last review was undertaken in 2020 (Cabinet report, June 2020).

Monitoring will consist of income received, customer feedback and Civil Enforcement Officer (CEO) observations. The income will be compared against previous years' income for existing on-street and off-street parking bays. The total income will be compared against the income targets set and the anticipated revenue. The comparison will not be done on a like for like basis as consideration will need to be given to the continuing impact on parking due to the Covid pandemic due to home working, on line shopping etc.

The monitoring will identify if there are any fundamental issues with assumptions made, which will be investigated as necessary.

Complaints and compliments and CEO observations are likely to be relevant to this and these are also likely to highlight any equality issues. It should be noted that this process is already in place and that issues raised by the public are always thoroughly investigated. Fluctuations in revenue from different car parks and on street parking is analysed on a regular basis and has been used to inform the options proposed.

Part C - Action Plan

Barrier/s or improvement/s identified	Action Required	Lead Officer	Timescale

EIA approved by:

Relevant Head of Service: Andrew Pitts Assistant Director, Neighbourhoods	Date: May 2023
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Please send an electronic copy of the EIA to the Cohesion and Equality Team and unless the EIA contains sensitive or confidential information ensure the document is uploaded to the EIA Register on the Intranet.

A brief summary of the EIA will be placed on the Council's website.

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