

## Appendix E - Equality Analysis Assessment

### Introduction

Public bodies such as local authorities are legally required to consider the three aims of the Public Sector Equality Duty (set out in the Equality Act 2010) and document their thinking as part of any decision-making processes. The Act sets out that public bodies must have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation;
- advance equality of opportunity between people who share a protected characteristic and those who do not share that characteristic; and
- foster good relationships between those who share a protected characteristic and those who do not share that characteristic.

The following equalities characteristics are 'protected' from unlawful discrimination in service provision under the Equality Act 2010: age; disability; gender reassignment; pregnancy and maternity; race; religion and belief; gender; and sexual orientation.

The Equality and Human Rights Commission (EHRC) have issued [technical guidance](#) for public authorities in England on the Public Sector Equality Duty. This technical guidance explains the three aims of the Public Sector Equality Duty, outlines the requirements of the Equality Act 2010 and the specific duty regulations and provides practical approaches to complying with the Public Sector Equality Duty. This document provides an authoritative, comprehensive and technical guide to the detail of the law. The EHRC technical guidance is not a statutory Code, but may be used as evidence in legal proceedings. Showing that the guidance has been followed - or being able to explain why it was not - will be relevant in demonstrating compliance with the Public Sector Equality Duty.

In addition to its statutory obligations under the Equality Act 2010, the Council has set its own equality objectives that underpin the Comprehensive Equalities Scheme (2012-2016). These five equality objectives are as follows:

1. Tackle victimisation, harassment and discrimination;
2. To improve access to services;
3. To close the gap in outcomes for citizens;
4. To Increase understanding and mutual respect between communities; and
5. To increase participation and engagement.

This equality analysis assessment considers the impact of the proposed recommendations from the Council's review of parking policy on the protected characteristics listed above. It is influenced by the requirements of the Public Sector Equality Duty and the Council's own equality objectives, and is proportionate in approach. It should be noted that there is no legal requirement on the Council to produce a formal equality analysis assessment as part of this policy review, but to do so is currently considered to be best practice by the Council.

## Impact of proposed recommendations

As a result of the consultation and engagement activities, and analysis of the key issues and findings from the parking policy review, a set of recommendations have been proposed for consideration by Mayor and Cabinet in April 2013.

The following section identifies how these proposed recommendations might impact on equalities, and in particular the characteristics 'protected' under the Equality Act 2010.

**Recommendation 1** – Maintain a minimum turnout of 10% of households within the implementation area, below which the consultation will be deemed inconclusive.

**Protected characteristics impacted:** age, disability and ethnicity  
**Impact on equalities:** neutral

In the parking survey, 2,217 (73%) responded that there should be a minimum voting turnout before a new CPZ is introduced. The continuation of a minimum turnout of households within the consultation area, will help to ensure that the introduction of any new parking controls will have greater legitimacy.

The Council will need to ensure that consultation materials on the voting process are in Plain English, and easy to understand to encourage voter turnout, especially since the parking survey indicated that the majority of respondents felt that minimum voting turnout should be set at 30% - a significant challenge. Historically, turnout for CPZ consultations is around 10-20%. Of the eight new CPZs implemented between 2005-2010, only two achieved a voting turnout of at least 30%.

CPZs and the corresponding voting process can be technical and complex to communicate. Promotion of the voting process will need to be well-publicised, and allow sufficient time for those residents that require extra support to participate. The Council should consider using local assemblies and tenants and residents associations, to help increase voter turnout.

Consideration of the best way to communicate these voting complexities will be particularly relevant for residents with learning disabilities or for whom English is not a first language. Alternate formats will also need to be available upon request (e.g. for the visually impaired).

**Recommendation 2** – Introduce CPZs where over 50% of residents (that vote) in the implementation area are supportive.

**Protected characteristics impacted:** age, disability and ethnicity  
**Impact on equalities:** neutral

In the parking survey 2,518 (89%) respondents expressing an opinion, agreed that there should be a minimum level of support amongst those that have voted for a new CPZ, before it is introduced. The most popular option for this minimum level of support was 50-54% of voters.

The council will need to ensure that consultation materials on the voting process are in Plain English, and easy to understand. CPZs and the corresponding voting process can be technical and complex to communicate. Consideration of this will be particularly relevant for residents with learning disabilities or in areas of the borough where there are high concentrations of residents for whom English is not a first language. Alternate formats will also need to be available upon request (e.g. for the visually impaired).

**Recommendation 3** – Remove the additional decision-making process by Mayor and Cabinet for results between 50% and 55%.

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**Protected characteristics impacted:** all  
**Impact on equalities:** neutral

This recommendation is a slight amendment of the decision-making process on new CPZs within current policy. Mayor and Cabinet will no longer be required to approve new CPZs where the level of support falls between 50-55%. It is anticipated that this will help to streamline the consultation process and improve response times to parking problems. It also means the majority view (either in favour or against) about the implementation of a CPZ will prevail, which ultimately is a fairer process.

**Recommendation 4** – Ensure consultation involves residents across a given area that are considered to be affected by both existing and potentially displaced parking pressure.

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**Protected characteristics impacted:** age, disability and ethnicity  
**Impact on equalities:** neutral

Whilst the Council needs to adopt an approach to consultation that is both proportionate and targeted, it must also facilitate an informed decision-making process by residents. This will help to ensure that any scheme introduced by the Council has the support of local residents.

Consultation materials on any new parking controls must be in Plain English, easy to understand, and clearly outline the options available. Consideration of this will be particularly relevant for residents with learning disabilities and alternate formats will also need to be available upon request (e.g. for the visually impaired). Sufficient time for the consultation will need to be provided, to allow for those residents that need extra support to participate, or for community-based groups to liaise with their membership.

According to the 2011 Census, nearly one in ten households in Lewisham do not contain a resident who has English as a main language. Further analysis

of the Census data will be required (once available) to identify whether this corresponds to specific geographical locations within the borough, and this must then be considered as part of any consultation process.

The Council should take sufficient notice of qualitative comments provided in the consultation in addition to quantitative responses, so that all residents and businesses are given equal opportunity to influence the outcome of the decision-making process. The degree of influence that respondents have in the final decision-making process also needs to be explicitly conveyed.

If the Council is running a public meeting or consultation event, then the accessibility of the venue must also be considered, for example, for residents with mobility or sight impairments, pushchairs users etc.

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**Recommendation 5** – Enhance the responsiveness of the CPZ review process to ensure that residents affected by displaced parking are consulted and agreed solutions are implemented.

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**Protected characteristics impacted:** age, disability, pregnancy and maternity, gender

**Impact on equalities:** positive

The issue of parking overspill from an established CPZ to surrounding roads outside of the zone can significantly affect the quality of life for many residents, and have a negative impact on good relations between neighbours and communities if not dealt with swiftly and effectively.

It is important to note that the shape of a CPZ is dependent on the support of residents. The current consultation process takes more than a year from consultation to implementation of a zone. By enhancing the responsiveness of the review process, residents affected by this type of displaced parking will have their issues identified and addressed. Consultation will also include residents affected by both existing and potentially displaced parking pressure.

This will be particularly important for residents with mobility issues that need to park near their home, visitors for isolated or vulnerable residents, expectant mothers, or families with young children. It will also allow vulnerable residents who are required to walk long distances from their parking space to their homes to share any safety and security concerns they might have.

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**Recommendation 6** – Maximise flexibility where feasible by offering a menu of options for the operating hours of CPZs. The options available will depend on the parking attractors in the local area.

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**Protected characteristics impacted:** age, disability, pregnancy and maternity  
**Impact on equalities:** positive

Providing flexibility on the hours of operation for CPZs, where feasible, will provide greater choice for local residents and businesses. CPZs with shorter

operating hours may have positive impacts on older, isolated or vulnerable people, that are reliant on informal carers or who need regular visits from family and friends to provide them with support.

Parking controls for a shorter time period may also benefit low-income households that cannot afford to pay for visitors parking permits, for deliveries, visits by trades-people etc.

Expectant mothers and families with young children, will also benefit from parking controls for a shorter time period, since it will allow friends and family to visit and provide support or child-care without the cost of a visitor parking permit.

Rationale for the options available for a given area must be transparent to ensure that residents and businesses do not feel that they are being discriminated against or treated inequitably compared to other neighbourhoods within the borough.

**Recommendation 7** – Develop a standardised approach for the submission and collation of CPZ parking issues to the Council.

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**Protected characteristics impacted:** age, disability and ethnicity  
**Impact on equalities:** neutral

The Council currently maintains a reactive position to parking problems and is driven by complaints and expressions of interest before consulting residents about the needs for parking controls. For those experiencing parking problems, the first point of contact with the Council is generally via a range of formal or informal channels.

The introduction of a standardised approach for all residents and businesses to submit their concerns to the Council regarding parking issues (including requests for new CPZs), will ensure that there is a more positive customer experience. It will also provide a cohesive and robust oversight of any potential parking problems that are emerging across areas of the borough.

This approach will also allow the Council to respond more quickly and effectively to address these problems, and prevent the escalation of any community tensions that might arise from them. It will enable the fair, consistent and transparent assessment and reporting of these issues, and provide an audit trail to add legitimacy to any parking solutions that need to be introduced.

Although the specifics for submitting parking issues have yet to be determined, it will likely be through the Council's main website and existing complaints function. Alternative provision will therefore need to be considered for those members of the community that don't have access to the Internet, or do not have the skill-set to complete an online feedback form or application form. Consideration will also be needed towards those with learning difficulties, visual impairments or for whom English is a second language, to ensure that

they have equal opportunity to access this service and do not experience indirect discrimination.

**Recommendation 8** - Where significant parking problems are predicted as a result of developments a presentation of evidence and specific solutions will be considered on a case by case basis, to be approved by Mayor and Cabinet. Solutions may include residents being given a chance to influence the design of the CPZ, but not vote as to whether one will be implemented.

**Protected characteristics impacted:** all  
**Impact on equalities:** neutral

In the parking survey, 2,579 respondents (86%) strongly agreed or agreed with the statement that “the Council should tell me when there is a parking problem in my area that might require a CPZ”.

The scale of proposed development of the major strategic sites in the borough will see the delivery of thousands of new residential units that are necessary to cater to Lewisham’s growing population. The Office of National Statistics predicts that Lewisham’s population will grow by 16% between 2011-2021, to a total of 321,000 people.

Major developments have the potential for significant impact on local residents in terms of the pressures on existing parking capacity, and the associated community tensions that may arise as a result of this. This may be compounded by the attraction to motorists of new retail units within these developments.

By considering these impacts early on in the planning and delivery process, the Council can seek to minimise any unforeseen issues created by these new parking pressures, and address the concerns that existing residents and businesses might have about the major development before it is completed.

Any consultation undertaken on the design and timing of new controlled parking zones, will need to be undertaken as soon as feasibly possible to allow for public feedback to influence the final design. As with other recommendations, the consultation will need to be clear, accessible and allow sufficient time for all those impacted by the proposal to properly engage in the process.

Residents and businesses may not fully appreciate the full impact that the proposed major development may have on parking in their locality, so this will need to be very explicit within the consultation documentation, so that they can come to an informed opinion. Where the Council is proactively introducing some form of parking controls as a result of a major development, this needs to be transparent, and a full explanation provided as to why this is necessary.

Comprehensive information is particularly important for Blue Badge Holders or motorists with mobility impairments, that may not be eligible for parking permits in any new car-free developments.

In the parking survey, respondents were given a list of 12 possible parking priorities and asked to rank them from high to low. The need to “support the most vulnerable residents” was ranked as the third highest priority, and so must be integrated into any management of future parking demand.

Where the delivery of car-free developments are being supported through the planning process, the Council must consider the negative impact of these restrictions on disabled residents, vulnerable or elderly residents reliant on carer support, and families with young children.

Although the choice of living in a car-free development lies with the individual resident, if not properly considered, new residential developments that provide zero or limited parking, may indirectly discriminate against disabled residents with mobility issues, or prevent vulnerable, isolated or elderly residents from easily receiving regular visitors or support.

Families with young children will need easy and close access to their homes, as will expectant mothers for whom there may also be health and wellbeing considerations. In extenuating circumstances, the expectant or new parents may be issued with temporary residential parking permits. This would be undertaken on a case-by-case basis, determined by critical need.

If limited parking provision is provided in major new developments, then pedestrian links to nearby transport hubs will need to be well-lit, to address safety and security considerations for all members of the community. This may be of particular concern for older people, lone females, or other groups within the community vulnerable to hate crimes.

**Recommendation 9** – Introduce a new charging model that is customer-focussed, offers affordable concessions to residents and visitors, and is supported by a strong policy rationale.

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**Protected characteristics impacted:** all  
**Impact on equalities:** positive

Since the Council increased the price of parking permits back in May 2011 as part of its review of fees and charges, it has received and considered a large range of feedback from residents, community groups and local assemblies. Some residents have expressed the view that the current permit charges are too high.

The Council’s charging model for parking is framed by the general assumption that there will be no significant net change to the parking revenue budget. However, within this assumption there is scope to offer concessions (where these are deliverable), and to link parking charges more transparently with inflation.

This more customer-focussed approach to charging will help to positively address the financial pressures being felt by Lewisham residents and businesses. It will ensure that the Council is more proactive and flexible in acknowledging the wider socio-economic influences of national policy reform

(e.g. welfare), and the cumulative impacts that this can have on household budgets. The Council should consider these wider impacts alongside any proposed increases to its own parking charges.

**Recommendation 10** – The new parking permit charges will be frozen at the new levels until the 2015/16 financial year and reviewed annually thereafter to take account of financial pressures.

**Protected characteristics impacted:** all  
**Impact on equalities:** neutral

In the parking survey, 1,816 (62%) respondents agreed or strongly agreed with the statement that “parking permit charges should be reviewed by the Council at least every two years”.

The Council is currently reviewing its wider budgets in order to make savings in line with the reduction of funding from central government. In the current economic and budgetary circumstances, it is essential that the Council does not significantly impact on its wider budgetary position. Any shortfall from the parking budget would ultimately impact on other public services offered by the Council, and may also have negative equalities implications within these service areas.

However, as part of any parking charge review process it will be important to consider the maintenance of concessionary rates for low-income households and for the most vulnerable members of society.

**Recommendation 11** – Consult the public on any future charge increases that exceed inflation.

**Protected characteristics impacted:** all  
**Impact on equalities:** positive

Any future increases to parking charges, that exceed inflation, will require consultation prior to implementation, to ensure that the views of the public can be taken into account, and that the charging process remains transparent.

It will also be important to consider the cumulative impacts of the ongoing changes to welfare payments (e.g. universal credit), alongside other economic barometers e.g. Average Weekly Earnings (AWE), and Indices of Multiple Deprivation (IMD), on a household's ability to pay any future increases to parking permit charges.

**Recommendation 12** – Introduce a concessionary rate (£30) to resident permit holders with the most efficient vehicles (e.g. Tax Bands A-B).

**Protected characteristics impacted:** all  
**Impact on equalities:** neutral



Residents with vehicles with the lowest CO<sub>2</sub> emissions (i.e. those based on tax bands A and B), will pay £30 for an annual resident parking permit if it is the first or only resident parking permit for that household. This concession is primarily intended to encourage the use of energy efficient vehicles, which reduce CO<sub>2</sub> emissions and help to improve the air quality within the borough. This concession is only available for one vehicle registration per household, even if the additional vehicles also fall within tax bands A and B. Further analysis would need to be undertaken to test whether higher-income households have greater financial means to update their vehicle more regularly, and therefore would benefit disproportionately from this new concessionary rate.

Any assumption that lower-income households do not own or cannot afford the most efficient vehicles (e.g. Tax Bands A-B) must be treated with caution. Based on current vehicle ownership data for 2012, 138 out of 7,485 resident permit holders would benefit from this concessionary rate (i.e. their vehicle falls within tax bands A-B for CO<sub>2</sub> emissions). Information is not currently available to cross-reference this data against household income.

The costs of newer models of energy efficient cars are reducing, and over a period of time, more households will become eligible for this concessionary rate as they replace their less energy efficient vehicles with newer models.

**Recommendation 13** – Either, maintain the current flat-rate charging model at £120, or introduce a lower rate of £110 for the first resident parking permit by charging a higher rate of £150 for additional vehicles.

**Protected characteristics impacted:** all  
**Impact on equalities:** positive and negative

In the parking survey, 1,935 (66%) respondents disagreed or strongly disagreed with the statement that “the current charges for parking permits are reasonable in the borough”. Of the 210 residents that indicated their household had purchased fewer resident parking permits than previously, 163 said that one of the reasons for this was that the “residents’ permit is now too expensive”.

In response to these concerns, the cost of a first resident parking permit could be reduced from £120 to £110 per annum, which would positively benefit 5,744 residents across the borough in the first year of implementation. However, this would need to be subsidised by charging a higher rate of £150 for all additional vehicles.

In the parking survey 1,425 (53%) respondents expressing an opinion, indicated that there was a case for charging a higher amount for the second and any subsequent parking permits requested by a household, where there is limited availability of resident parking.

In addition, respondents were asked to rank four potential options for parking charging models, in order of preference. After flat rate charging for all resident

and business permits, charges based on the number of permits per household was the second most popular choice. 800 respondents selected this charging option as their first preference choice.

According to the 2011 Census data, there are 13,207 (11.3%) households in the borough that own two or more cars or vans (a decline of over 1,500 households since the 2001 Census). This data cannot be mapped to CPZ areas at present. However, according to the Council's own data, approximately 1,603 residents purchase more than one resident parking permit annually.

Based upon an analysis of responses to the vehicle ownership question in the parking survey, this recommendation will not impact more negatively on any specific protected characteristics, with the exception of age.

In the parking survey, a significantly lower percentage of respondents aged 18-24 years, indicated that "where there is limited availability of resident parking, there is a case for charging a higher amount for the second and subsequent parking permits requested per household". Only 24.2% of those aged 18-24 years supported this statement, compared to a survey average of 48.8%, across all age bands.

According to survey responses, multiple vehicle ownership per household rises to almost 55% of those aged 18-24 years, which is more than double the survey average (25.8%) for multiple vehicle ownership per household. It should be noted however that this assessment is based on a very small sample size amongst 18-24 year olds (a total of 33 individual respondents).

Additionally, the 2001 Census, states that there are 24,170 people aged 18-24 years in Lewisham, of which 5,558 (23%) live in households with two or more cars or vans. Although this does not specify whether these households fall within a CPZ, this overall percentage of 23% of 18-24 year olds with multiple vehicle ownership per household is much more comparable to the survey average of 25.8% detailed above.

It should also be noted that as part of the new parking contract, to be let in 2013, the Council will be able to offer payment by instalments, and this should assist low-income households in spreading the cost of parking permits over a longer period of time.

**Recommendation 14** – Introduce new scheme rules and a refunds policy governing the new permit charges.

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**Protected characteristics impacted:** all  
**Impact on equalities:** positive

A new refunds policy will ensure that residents who purchase the most efficient vehicles (e.g. Tax Bands A-B) are charged the appropriate amount upon parking permit renewal and that refunds due are processed efficiently. This will make the charging process more fair and transparent and will protect residents from paying more than they should.

**Recommendation 15** – Reduce the cost of weekly visitor parking permits from £28 to £20 per week.

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**Protected characteristics impacted:** all  
**Impact on equalities:** positive

In the parking survey, 1,418 respondents indicated that they purchase visitor parking permits. Of the respondents that answered the question, 1,737 (62%) disagreed or strongly disagreed with the statement that “the current charges for visitor parking permits are reasonable”.

An £8 reduction in the weekly charge for a visitor parking permit will have a positive equalities impact across all protected characteristics. In particular for older, disabled or more vulnerable and isolated members of society who may be reliant on an intensive period of unpaid care and support from friends and family particularly following a period of illness, or recent discharge from hospital.

It will also benefit local businesses and trades people who may deliver in-house services to local residents over an extended time period (e.g. builders and decorators).

**Recommendation 16** – On application, provide a book of ten visitor parking permits (1-hour) free of charge to all households that currently have at least one resident parking permit holder.

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**Protected characteristics impacted:** all  
**Impact on equalities:** positive

In the parking survey, 1,446 (53%) of respondents disagreed or strongly disagreed with the statement that “current CPZs support residents to receive visitors”.

This free provision will have a positive equalities impact across all protected characteristics. Older, or more vulnerable and isolated members of society will benefit from this, as it will provide a contribution towards the cost of having friends and family to visit. It will also support all residents in CPZs to manage the costs of visiting trades people, home deliveries etc.

**Recommendation 17** – On application, provide a book of 10 visitor parking permits (1-hour) free of charge to residents in CPZs that are over 60 years and in receipt of council tax support and do not have another parking permit.

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**Protected characteristics impacted:** age  
**Impact on equalities:** positive

According to the 2011 Census data, there are 9,994 Lewisham residents aged 65 and over, that are living alone. This recommendation is in response to concerns raised through the consultation regarding social isolation amongst older people, particularly those without access to their own transport. These free permits will apply if they do not own a vehicle (or if these households have off-street parking), and so don't already possess a resident parking permit, or carer permit. This free provision will have a positive equalities impact on older people living in low-income households that are in receipt of council tax support. This concession will help the more financially disadvantaged, isolated, and older members of society, by contributing towards the cost of visits by friends and family, home deliveries, visiting trades people etc.

### **Recommendation 18 – Provide carer parking permits free of charge.**

**Protected characteristics impacted:** age and disability

**Impact on equalities:** positive

In 2011/12 there were 108 carers permits issued in the borough. Carers' permits are for residents who require constant help and care, and do not own a vehicle. These permits are particularly aimed at elderly or disabled residents who rely on regular visits from friends, family or professional carers. They do not carry a specific registration number and can be used by any person caring for the resident. They are issued to the resident that needs the care, rather than the carer. The resident needs to provide a scanned copy of a letter from their Doctor or GP confirming their address and that they are housebound and dependant on a carer on a daily basis. Use of the permit is restricted to four hours in any one day.

In the parking survey, 37 respondents indicated that they had a carer's parking permit. Of the 30 carer permit holders that expressed an opinion, 21 indicated that the existing annual charge of £65 for the carer parking permit was not reasonable. Of the 27 carer permit holders that expressed an opinion, 20 indicated that the existing four-hour daily time limit on the annual carer parking permit was appropriate to their needs. However, feedback from community groups (outside of the standard survey responses) have indicated that there should be no time-limits applied to carers permits

Carers permits will be provided free of charge from 2013, and this will be a positive financial benefit to all those residents that currently purchase them, especially those in low-income households, and those living on a pension or pension credit. As part of this change, the robustness of the criteria and application process for carer's permits will be reviewed to ensure that this new provision is not open to abuse. Use of the carer parking permit will continue to be restricted to four hours in any one day.

It is worthwhile noting that some residents who rely on the help of a carer, may not be eligible for a carers' parking permit because they do not need constant help and care. Carers Lewisham supports approximately 5,000 unpaid carers in the borough who look after a mentally or physically ill or disabled relative or friend, and 167 of the 3,113 respondents to the parking survey indicated that they were "a person with caring responsibilities". Therefore, for the majority of

residents living in CPZs, supported by these carers, the cost of visitor parking permits will be more of a critical issue.

According to the 2011 Census the provision of unpaid care has remained broadly stable since 2001. There are 13,931 residents (5%) providing between 1 to 19 hours unpaid care a week, 3,502 (1.3%) providing 20 to 49 hours unpaid care per week, and 5,088 (1.8%) providing 50 or more hours unpaid care a week. Data is not currently available to identify where these residents are providing unpaid care, and whether these locations are within CPZs.

**Recommendation 19** - Maintain the current annual charge for a business parking permit (£500).

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**Protected characteristics impacted:** all  
**Impact on equalities:** neutral

In the parking survey, 1,545 (71%) of respondents neither agreed nor disagreed that the current charges for business parking permits are reasonable.

Although the current charges for business permits in Lewisham are at the high-end when compared to the 13 other London Boroughs that have flat rate charging structures, this recommendation is a continuation of current policy.

It should be noted that only 59 (2%) of parking survey respondents currently use a business permit.

**Recommendation 20** - Maintain the current charges for car parking and on-street Pay and Display facilities.

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**Protected characteristics impacted:** all  
**Impact on equalities:** neutral

The current pricing structure for car parks is aligned with the pricing policy for on-street Pay and Display.

The car parks pricing policy, attempts to ensure that sufficient revenue is generated to finance the maintenance, security and cleaning of the car parks, whilst balancing the affordability to local residents, visitors and shoppers.

Reasonably priced car parks and Pay and Display facilities contribute both to the strength of the local economy, and also the survival of neighbourhood businesses in a challenging economic environment. Benchmarking with other local authorities in London indicates that parking in Lewisham is reasonable priced (see Appendix F).

**Recommendation 21** – Maintain the implementation of free short-stay bays of 30-minutes near business hubs, but consider a longer duration of 1-hour in specific circumstances.

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**Protected characteristics impacted:** age, disability, pregnancy and maternity  
**Impact on equalities:** positive

In the parking survey, the majority of respondents that expressed a preference (930 out of 1,243) disagreed with the statement that “on-street parking for customers near local businesses is adequate”. The majority of respondents that expressed a preference (734 out of 1,243), also disagreed with the statement that “current time limits for free parking bays near local businesses is reasonable”.

The provision of free short-stay parking bays helps local residents to support Lewisham’s businesses, and adds to the ease and convenience of shopping locally. Frail or vulnerable people, those with mobility issues, expectant mothers, and families with young children all benefit in particular from parking closer to the shops and services that they need to use on a regular basis.

In areas where short-stay capacity is required to support local businesses, free short-stay bays will continue to be implemented in the vicinity of local shopping parades and high streets. Any new bays will generally be limited to 30-minutes, however, where there are specific local circumstances requiring a 1-hour free bay, such requests will be considered.

The consideration of free parking to support local businesses during the design or review stage of a CPZ will also help to address the issue of shoppers parking in nearby residential roads that are not part of the CPZ.

Small and medium sized local businesses who are facing challenging economic circumstances will also welcome any measures that adds to the attractiveness of neighbourhood shopping, particularly when faced with competition from larger retailers that offer free car parking facilities.

**Recommendation 22** – Continue to provide Blue Badge Holders with a resident parking permit free of charge.

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**Protected characteristics impacted:** disability  
**Impact on equalities:** positive

The Blue Badge parking scheme is for people with permanent walking disabilities and blind people. Disabled people (drivers or passengers) can apply for a Blue Badge that allows them to park their vehicle on the street close to where they need to go, and eligibility is reviewed every 3 years.

National rules governing the Blue Badge scheme do not permit parking in resident’s bays within CPZs. To address this issue, Blue Badge Holders that reside within a CPZ, will be provided with a resident parking permit free of charge. This is a continuation of current parking policy.

According to the 2011 Census data, there were 19,523 Lewisham residents (7.1%) that indicated that their day-to-day activities were limited a lot. Although this question is subjective and does not explicitly identify those residents who are registered as disabled, it could be regarded as the nearest proxy for disability. There are currently 7,200 Blue Badge Holders in the borough, though not all of these live within CPZs.

**Recommendation 23** – Continue to facilitate the introduction of advisory bays in non-CPZ areas, but remove or convert advisory bays to mandatory bays in CPZ areas.

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**Protected characteristics impacted:** disability

**Impact on equalities:** neutral

Disabled parking bays are either mandatory or advisory. Mandatory bays are legally enforceable, and in addition to the marking on the carriageway, include a post and sign. They require the making of a Traffic Management Order (TMO) to implement, and can be used by any Blue Badge Holder once installed. Advisory bays are quicker and cheaper to implement, but they are not legally enforceable.

Mandatory disabled parking bays, where necessary and feasible will be implemented as part of a new or reviewed CPZ. As a financial efficiency, a TMO for mandatory disabled parking bays may be submitted annually across the borough, but the mandatory bays for each CPZ could be marked up as required, though they would not be enforceable until the overall TMO is implemented.

Advisory bays will continue to be provided in non-CPZ areas where parking is free and parking pressures are not too high. However, advisory bays may pose a problem in a CPZ as anyone is entitled to park in the bays. This can create confrontational situations between Blue Badge Holders and non-Blue Badge Holders, that the Council is unable to resolve through enforcement.

As such, advisory bays will not be introduced in a new CPZ, and those that are already in existence in a current CPZ will be phased out as part of the ongoing review and implementation programme. There is a possibility that outside of the hours of operation of the CPZ, this may cause parking problems for Blue Badge Holders.

Where necessary, advisory bays in a CPZ will be replaced with new mandatory bays. This will provide greater protection to Blue Badge Holders since these bays will be enforceable by law, and this will limit abuse by non-Blue Badge Holders. It should also help those with mobility impairments to park closer to their homes.

However, there is also a possibility that the removal of advisory bays in a CPZ may not be compensated for by an equal addition of new mandatory bays. In this instance, some Blue Badge Holders that currently have access to an advisory bay, may lose this unenforceable parking protection if a replacement

mandatory bay is deemed to be unfeasible, unsafe or does not meet the new application criteria.

**Recommendation 24 – Disabled parking bays:** Establish an application process for disabled bays, with set criteria to ensure that bays are necessary, safe and feasible.

**Protected characteristics impacted:** disability

**Impact on equalities:** positive

There are 7,200 Blue Badge Holders across the borough, of which 107 responded to the parking survey. Of these, 31 (29%) require a disabled parking bay in their road, and don't currently have one, either advisory or mandatory.

In view of potential demand for new disabled bays, whether mandatory (CPZ) or advisory (non-CPZ), a new process needs to be established that will assess and implement requests for disabled bays. This will include an application process with set criteria to ensure that bays are necessary, safe and feasible. In particular, residents must hold a valid Blue Badge, and must therefore reference a vehicle registered to their home address in Lewisham.

The cost of the necessary TMO for a new mandatory bay can be up to £3,000, which means that it will not always be possible to implement individual mandatory bays on request. This situation will need to be closely monitored.

In the development of the new application process, the Council needs to consider engagement with relevant stakeholders and community groups representing the interests of residents that are disabled or Blue Badge Holders. This is necessary to ensure that any further changes are informed by the concerns and issues of those that will be impacted, and that the new application process is transparent and easy to understand. It will also help to set appropriate expectations amongst Blue Badge Holders as to their eligibility for either an advisory or a mandatory parking bay.

**Recommendation 25 –** Establish an annual programme, as part of the CPZ programme, for the provision and review of disabled parking across the borough.

**Protected characteristics impacted:** disability

**Impact on equalities:** positive

In order to manage and fund requests for new mandatory and advisory disabled parking bays, an annual programme will be established that will look at the provision of disabled bays across the borough. This will include:

- new advisory bays outside CPZs;
- new mandatory bays in CPZs;
- conversion of advisory bays in CPZs to mandatory bays;



- new shared-use bays; and
- removal of bays where no longer required.

The provision of new shared-use bays within restricted parking areas, is especially important for Blue Badge Holders without a valid resident permit for that zone. Blue Badge Holders are currently able to park free of charge for up to 3-hours in shared-use bays, Pay and Display bays and on single yellow lines. This allows them to visit friends or family, or use amenities such as shops, health services etc.

Feedback from community groups and Blue Badge Holders at stakeholder events has indicated that the lack of provision or insufficient capacity of shared-use bays near the services that they need to access, is a major source of concern and frustration. This is particularly an issue close to the hospital and other health centres, or areas of the borough where there are no shared-use bays (i.e. Grove Park). A regular review of this provision will have a positive impact on Blue Badge Holders.

As part of this review process, the Council needs to consider engagement with relevant stakeholders and community groups representing the interests of residents that are disabled or Blue Badge Holders. This is necessary to ensure that the impacts of current parking policy and disabled bay provision on Blue Badge Holders are properly understood by the Council, and that any further changes are informed by the concerns and issues of those that will be most affected.

**Recommendation 26** – Maintain the national scheme of a 20-minute period for loading or unloading items or other goods from the vehicle, and maintain a 5-minute minimum observation period to ascertain whether this activity is being carried out before considering enforcement action.

**Protected characteristics impacted:** disability, age, pregnancy & maternity  
**Impact on equalities:** positive

In CPZs, all vehicles are currently allowed up to 20 minutes to pick-up or drop-off passengers, or to load or unload shopping or other goods. This is intended to help those who may require more time to carry out this activity (e.g. to unload an electric wheelchair from a car, or to be assisted inside their home by the driver of the vehicle). It is not intended to allow short-stay parking. Therefore this activity must be constant, and enforcement officers will allow a 5-minute observation period to assess whether any loading activity is taking place before issuing a penalty. This is a continuation of current policy. Where there are extenuating circumstances that result in a penalty charge notice being unfairly issued, a robust appeals process is in place to take specific circumstances into account.

**Recommendation 27** – Refresh all parking policies and collate into an integrated and accessible parking policy document.

**Protected characteristics impacted:** all  
**Impact on equalities:** positive

By pulling together all of the Council's parking policy into a single integrated policy document, it will be more transparent, more accessible and easier to understand for all of Lewisham's residents and businesses. It will also be easier for the Council to maintain, so that any changes to policy can be updated in a timely fashion, and that service users feel confident that the information being presented to them is the most current and accurate.

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**Recommendation 28** – Review the parking policy at least every three years.

**Protected characteristics impacted:** all  
**Impact on equalities:** positive

The current parking policy and operating procedures have developed significantly since the introduction of CPZs. The policy has therefore evolved incrementally over time and through successive committee reports. This has resulted in policy documentation that is fragmented and inaccessible.

The current policy review is the widest and most comprehensive review of parking that has taken place to date, and this momentum should be maintained through periodic reviews to ensure that parking policies remain fit-for-purpose, accessible and transparent.

The geographic, demographic, and socio-economic profile of the borough continues to evolve at a rapid pace, and only through regular review can the service remain abreast of new emerging issues, and respond to previously unforeseen parking pressures or service inequalities.

Regular reviews, also provide a voice to those impacted by the policy to raise their concerns and influence future service improvements.

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**Recommendation 29** – Authorise the Executive Director of Customer Services and the Executive Director of Resources and Regeneration to approve the final policy document in line with the recommendations in this report.

**Protected characteristics impacted:** all  
**Impact on equalities:** neutral

There are no specific equalities implications linked to this policy recommendation, although the transparency of the sign-off process for the final policy document will need to be considered, and appropriate communication maintained with all relevant stakeholders.

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**Recommendation 30** – Establish a prioritised programme for the consultation, implementation and review of CPZs.

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**Protected characteristics impacted:** all

**Impact on equalities:** neutral

With high demand for the review or implementation of CPZs, and a limited budget, a prioritised programme is needed to ensure that the most urgent issues are addressed first.

There are a number of factors in prioritising these issues and formulating a programme. These include factors that can be easily quantified, such as the number of requests made by residents, and other factors that cannot be easily assessed, such as the impact on road safety, or severe impacts on a limited number of people.

An annual programme for consultation, review and implementation of CPZs will increase transparency of the process for local residents and businesses, and help set appropriate expectations on when parking issues might be addressed by the Council.

A definitive timetable for the consultation, review or implementation on a CPZ may also help to alleviate any community tensions that have arisen as a result of local parking issues, since residents and businesses will see that the Council is taking their concerns seriously, and has appropriate plans in place to address these.

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**Recommendation 31** – Establish a new funding model for the proposed CPZ Programme.

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**Protected characteristics impacted:** all

**Impact on equalities:** neutral

The pressures on the CPZ programme have varied from year-to-year, but demand is expected to increase in response to this policy review. Therefore, the Council needs to ensure that the adopted funding model is financially sustainable over time, so that the expectations of service-users can be managed appropriately. Any direct correlation between the funding model and parking charges and/or concessions will need to be closely considered, so that the overall CPZ process remains transparent and equitable to all residents.

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**Recommendation 32** – Report annually on the proposed CPZ Programme and on the delivery of the previous year's programme.

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**Protected characteristics impacted:** all

**Impact on equalities:** neutral

In order to ensure the transparency of the programme, an annual report will be produced. This report will set out a prioritised programme for consultation on, or implementation of, new or existing CPZs, including the basis on which the programme has been set out.

An annual report will keep local residents and businesses informed, and help set appropriate expectations on when parking issues might be addressed by the Council. Issues with the previous year's programme will be highlighted, which should lead to continuous improvement in the delivery of the programme in the future.

A well-maintained, published timetable for the CPZ programme may also help to alleviate any community tensions that have arisen as a result of local parking issues, since residents and businesses will see that the Council is taking their concerns seriously, and has appropriate plans in place to address these.

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**Recommendation 33** – Produce an enhanced and accessible annual report on parking related revenue.

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**Protected characteristics impacted:** all  
**Impact on equalities:** positive

Although the Council already produces an annual report that meets minimum statutory requirements, residents have asked for greater transparency of what the charges are based on and how income is spent. By producing an enhanced annual report on parking related revenue, it will be more transparent, more accessible and easier to understand for all of Lewisham's residents and businesses.

It will help to demonstrate to resident permit holders, how the revenue from the sale of these permits (24% of the total income for parking services in 2011/12), has been used for the management and administration of CPZs, as well as the enforcement of parking controls. It will also help to hold the Council to account in terms of the value for money that it provides in delivering its parking services, and will allow the community and interested parties to benchmark the Council's service against similar local authorities elsewhere.

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**Recommendation 34** – Continue to work with schools to develop School Travel Plans to encourage safe and sustainable travel for their staff, pupils and parents.

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**Protected characteristics impacted:** all  
**Impact on equalities:** neutral

The Council already works with schools to establish School Travel Plans, which aim to reduce the dependence on the private car for all school related journeys.

Any consideration of school parking arrangements will need to balance the specific needs of local residents with those of parents and staff at the school. It is unlikely that one solution will suit all schools across the borough, and so this may need to be a bespoke arrangement.

Parents dropping-off or collecting their children, will usually impact on local kerb-side capacity for a short period of time, during similar hours each day, and primarily on weekdays only during term time. This parking pressure could be addressed by short-stay parking arrangements. The need for parents to drive their children to and from school is often an important safety and security consideration, especially for much younger children, and so some form of temporary parking provision will need to be continued. This will also be an essential requirement for either parents or children that have severe mobility impairments, who are reliant on a private car for all school related journeys.

The issue of school staff, parking all-day in residential roads surrounding schools is a different problem and will therefore require an alternative solution to the above. CPZs could be established near schools, but would be subject to the same constraints and consultation processes as other CPZ areas in and around places of work.

It is worth noting that in the parking survey 1,255 respondents indicated that schools were a location where controlled parking zones should be introduced. This was the second most popular location for parking restrictions, after train stations.

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**Recommendation 35** – Pay and Display machines to be phased out over-time in favour of more cost effective and cashless parking, alongside alternatives for people who do not have access to a mobile phone or debit/credit card.

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**Protected characteristics impacted:** all  
**Impact on equalities:** negative

Pay and Display machines are an unsustainable and uneconomical way of taking payment for parking charges. They provide a target for on-street vandalism and theft which results in lost revenue and repair costs for the Council.

Pay and Display machines also pose significant contractual costs to the Council, they are expensive to purchase, and with an ageing infrastructure, maintenance costs will certainly increase.

However, in the parking survey, 1,347 respondents indicated that Pay and Display machines were their preferred choice of payment for on-street parking charges. This was the most popular response option for on-street parking charges.

Additionally, in the parking survey, 2,043 (86%) of respondents who expressed an opinion disagreed or strongly disagreed with the statement that “Pay and Display machines across the borough should be removed and replaced to allow for payment by mobile phone instead”.

The Council will therefore need to ensure that the move away from Pay and Display machines is accompanied by an appropriate communications

campaign that considers this resistance amongst residents and visitors, and ensures that concerns in this area are properly addressed.

This should clearly set out the alternative payment methods available, and reassure residents or visitors that do not have access to a mobile phone or credit/debit card that they still have legitimate payment options, that allow them to park safely and conveniently in Lewisham.

Consideration should also be given to those who might be vulnerable from a personal safety perspective, particularly in parking locations that are poorly lit or isolated – i.e. if they are required to use their mobile phone or credit/debit cards in public view.

The provision of additional payment options as technology evolves must also be considered in terms of accessibility for the user, to prevent indirect discrimination from occurring. For example, alternatives such as top-up cards, should consider the proximity and hours of operation of the nearest PayPoint location in relation to the on-street parking bays. This may be very significant for users with mobility issues. New service provision, should not default exclusively to online channels, since up to 15% of Lewisham residents do not have access to the internet at home.

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**Recommendation 36** – Where funding is available, new charging points for electric vehicles will be placed in locations that seek to serve the wider community.

**Protected characteristics impacted:** all  
**Impact on equalities:** positive

An increase in the number of charging points (on-and off-street), will help to make the use of electric vehicles more accessible to all users, and to provide a greater spread of provision across the borough to encourage the take-up of more energy-efficient vehicles, and to enable residents to undertake their day-to-day business more conveniently. This will be especially beneficial for users of electric vehicles that have mobility impairments, small children, or who are pregnant and need to park close to their intended destination.

By placing new charging points in locations that benefit the community as a whole, consideration should also be made to whether this requires any trade-offs with existing resident bays, disabled bays, business bays or Pay and Display bays. Consideration to those that need to park close to their homes (e.g. those with mobility issues, young children etc.) must inform the provision and promotion of sustainable travel policies.

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**Recommendation 37** – All signs within existing CPZs will be reviewed as part of the review programme to ensure they are consistent and clear.

**Protected characteristics impacted:** all  
**Impact on equalities:** positive

Inconsistent or unclear signage within a CPZ can cause confusion to drivers, and may result in parking violations that residents or visitors feel are unjustified or unfair. This can damage their perception of the Council, and is particularly problematic for those in low-income households who cannot afford to pay parking fines. Clearer signage will also help to reduce parking contraventions within a CPZ, that may contribute towards more positive community relationships between residents and visitors. It will also benefit those for whom English is not a first language, and so might be more easily perplexed by any inconsistent signage.

## Equalities Monitoring

Equalities monitoring has been undertaken as part of the consultation and engagement process that underpinned the review of parking policy.

The key instrument for consultation was the self-completion survey, which captured the protected characteristics of those 3,113 respondents that chose to provide this information about themselves.

In addition to the self-completion survey, feedback from community groups that represent the interests of particular protected characteristics (e.g. age and disability) and residents has been incorporated into this analysis. This feedback has been received through various channels such as ward councillors, stakeholder events, face-to-face meetings, complaints and emails from the public.

The following sections examine each of the characteristics protected under the Equality Act 2010, and identifies key data and analysis that should be considered as part of the decision-making process during the development of a revised parking policy. The protected characteristics are as follows (numbers correspond to relevant section number):

1. Age;
2. Disability;
3. Gender;
4. Gender reassignment;
5. Pregnancy and maternity;
6. Race;
7. Religion or belief; and
8. Sexual orientation.

### 1. Age

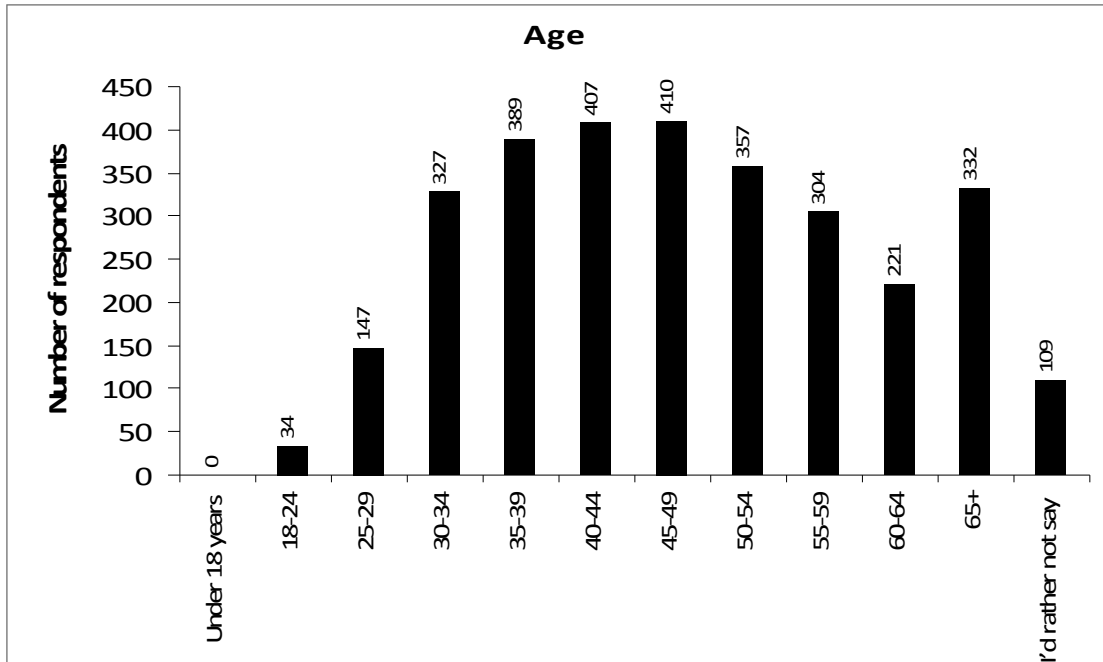
Age is defined by reference to a person's age group. An age group can mean people of the same age or people of a range of ages.

#### Data summary for age

- according to the 2011 Census some 70,100 Lewisham residents are aged between 0-19 (25% of the population), whilst some 179,800

residents are aged between 20-64 (65% of the population). By contrast there are some 26,200 older people aged 65 and over (9.5%);

The graph below shows a breakdown by age of the respondents to the parking survey.



Analysis of responses to key parking survey questions by the protected characteristic of age, revealed the following findings:

- Almost two-thirds (62.2%) of respondents that were aged 65+ years, currently reside in a CPZ. Of these, the majority (52%) stated that “current parking controls in their area meet their needs”.
- Of those respondents aged 65+ years, not living in a CPZ, less than one-third (29.8%) thought that “parking controls are needed in their area”.
- In all age groupings, the majority responded that “supporting the most vulnerable residents” should be of high importance to the Council when deciding its parking priorities. However, the extent of this majority increased in direct correlation to age groupings for respondents aged 40 years and above.
- Similarly in all age groupings, the majority responded that “helping good relations between neighbours” should be of high importance to the Council when deciding its parking priorities. The extent of this majority also increased in direct correlation to age groupings for respondents aged 50 years and above.
- Of those aged 65+ years that responded to the question, 79.4% disagreed or strongly disagreed with the statement that “the current charges for parking permits are reasonable” in the borough. This is significantly higher than the



two-thirds (66%) of total respondents to the survey that disagreed or strongly disagreed with this same statement.

Analysis of the available qualitative feedback on parking has highlighted a number of key issues that have been specifically attributed to age as a protected characteristic. These have been summarised below:

- For many older people, health and well-being depends upon regular visits from friends and relatives;
- Weekend parking should be free to allow family visitors;
- Overall cost of health and well-being issues for vulnerable and isolated older people to Health and Social Care services is far in excess of any income collected through visitors permits;
- The most vulnerable and isolated should not be made to pay for the Government's benefit and service cutting;
- Parking charges for resident and visitor permits are unaffordable for pensioners and elderly residents that live alone;
- Discounted or free visitor parking permits should be provided to the elderly, especially those who do not own a car and so are not creating an overall impact on parking demand.

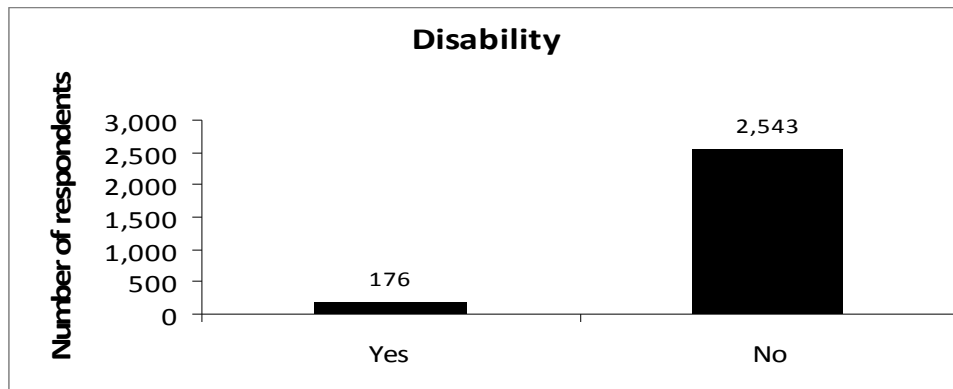
## 2. Disability

A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities. A summary of data on disability is set out in the box below.

### **Data summary for disability**

- according to the 2011 Census, 7.1% (19,523) residents indicated that their day-to-day activities were limited a lot, and 7.3% (20,212) indicated that their day-to-day activities were limited a little. This question is regarded as a proxy for disability, since results for the 2011 Census are not yet comparable with the 2001 Census data set;
- the 2001 Census data, showed that 15.6% of the borough's population (38,824 people) had a long-term illness (proxy for disability), which limited daily activities or the work they could do. This figure was slightly higher than the London average of 15.5%, but significantly lower than the national average of 18.2%;
- the 2001 Census also recorded that over a quarter of households in Lewisham (29.4%) contained one or more people with a limiting long-term illness or disability, which was lower than the average for England and Wales as a whole where the proportion is 34%.

The graph below shows a breakdown by disability of the respondents to the parking survey.



Analysis of responses to key parking survey questions by the protected characteristic of disability, revealed the following findings:

- Just over three-fifths (61.7%) of survey respondents, who indicated they were disabled, currently reside in a CPZ. Of those disabled residents, living in a CPZ, just over one-third (35.2%) felt that the “current parking controls in their area met their needs”.
- When asked to think about the consultation process undertaken by the Council as part of the CPZ implementation, 43.1% of respondents who indicated they were disabled, were dissatisfied or very dissatisfied with “the time provided to consider the issues”. This is much higher than the 32.5% average across all survey respondents to this question.
- Of those survey respondents, who indicated they were disabled, but do not reside in a CPZ, over two-thirds (66.7%) indicated that they “do not think that parking controls were needed in their area”.
- Of respondents that indicated they were disabled, 82.5% stated that “supporting the most vulnerable residents” should be of high importance to the Council when deciding its’ parking priorities. This is much higher than the 70% average across all survey respondents to this question.
- There was little variation between the number of disabled respondents (52.9%) and non-disabled respondents (51.5%) that disagreed or strongly disagreed with the statement that “current CPZs support residents to receive visitors”.
- Similarly, there was little variation between the number of disabled respondents (67.8%) and non-disabled respondents (64.5%) that disagreed or strongly disagreed with the statement that “the current charges for parking permits are reasonable in the borough”.
- Interestingly, far fewer non-disabled respondents (27%) than disabled respondents (43.4%) agreed or strongly agreed with the statement that “car parks are accessible for disabled people”.

Analysis of the available qualitative feedback on parking has highlighted a number of key issues that have been specifically attributed to disability as a

protected characteristic. Issues specific to paid and unpaid carers have been included within disability rather than age, though in many instances these will cut across both protected characteristics. Key issues raised are as follows:

- Unpaid carers provide an invaluable service to the community, therefore social outcomes should be considered as part of the overall parking policy review;
- Unpaid carers cannot easily park to visit family where there is an urgent need;
- Carer permits are difficult to get at short notice and expensive if the visits are rare or may only be for a short period;
- 2-hour time allowance on Pay and Display bays not long enough for health care and social care professionals, as many clinic sessions last longer than this. Staff are required to move their cars in the middle of a clinic session and spend excessive time finding vacant Pay and Display bays;
- Essential car user employees (e.g. social workers) are paying to park close to a client's address, to carry equipment and to speed up times between visits;
- No time limit should be levied for carer permits;
- There is a current lack of provision for those needing longer term care each day;
- Carer parking should be free if residents need help in their home they are saving the government from having them in hospital;
- Neither carers nor care workers should be charged to park in restricted areas;
- Carers' permits that are no longer required should be refunded pro-rata;
- The impact of new developments should be considered in relation to those requiring carers;
- There is no current facility to apply for both a carers' permit and a residents permit at the same address;
- Disabled people should be given a spare visitor parking permit free of charge;
- Blue Badge Holders should be allowed to park free during CPZ hours of operation;
- During operational hours in CPZs, vehicles should be able to park for up to 15-minutes to safely drop-off/pick-up passengers with no return to same zone during restricted time;
- Disabled residents need to park close to their homes to manage heavy shopping etc.;
- Disabled parking bays that are not used regularly should be removed;
- There are insufficient disabled parking bays near to shops, health facilities, hospitals etc.;
- Disabled bays are limited around areas in which they are more likely to be needed e.g. Laurence House, Lewisham Hospital;
- Use of disabled parking bays by non-disabled users, and dual-use bays taken up by other motorists make parking for Blue Badge Holders very difficult;
- The size of bays in car parks are insufficient for disabled access;
- Consideration is needed for the extra space required to load an electric wheelchair into the back of a car when designing CPZ;
- Neighbourhood tension is caused by under-used disabled parking bays and over-used resident parking bays within a CPZ;
- The exclusive reserving of resident parking bays by disabled drivers is causing neighbourhood tensions;
- Blue Badge clocks are being abused by users changing the time throughout the day to extend their stay in Pay and Display bays or car parks;

- The use of carers' permits and Blue Badges should be scrutinised more thoroughly, to prevent abuse by visitors or trades-people, or people who use blue badges but are capable of normal walking activities.
- During the Council's consultations for parking, consideration and alternative provision should be made for those residents with learning disabilities or sensory impairments.

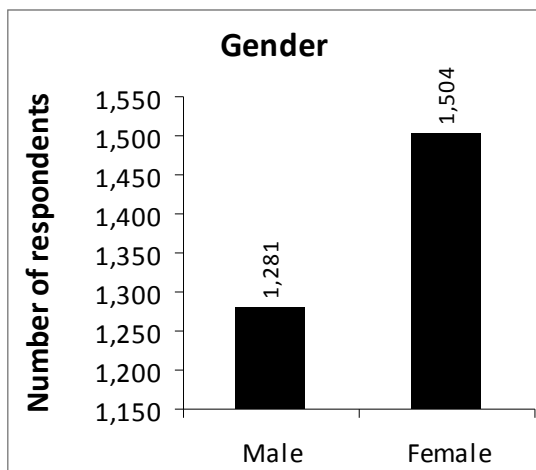
### 3. Gender

Gender has the meaning usually given to it and refers to whether a person is male or female. A summary of data on gender is set out in the box below.

#### Data summary for gender

- according to the 2011 Census there are 135,000 males living in Lewisham and 140,900 females;
- based on the 2011 Mid-year Population Estimates Lewisham's males are more numerous than females between the 0-19 as well as the 20-44 and 35-59 age groups. By contrast females are more numerous than males in the 60 -79 and the 80+ age groups.

The graph below shows a breakdown by gender of the respondents to the parking survey.



Analysis of responses to key parking survey questions by the protected characteristic of gender, revealed the following findings:

- Of those residents living in a CPZ, more males (51%) than females (44.5%) indicated that the “current parking controls in their area met their needs”.
- Significantly more female respondents (76.3%) than male respondents (63.2%) stated that “supporting the most vulnerable residents” should be of high importance to the Council when deciding its' parking priorities.

- More male respondents (18.5%) than female respondents (13.8%), agreed or strongly agreed with the statement that “current CPZs support residents to receive visitors”.
- More female respondents (25.9%) than male respondents (21.8%), disagreed or strongly disagreed that “car parks feel safe and secure”.

Analysis of the available qualitative feedback on parking has not highlighted any issues that have been specifically attributed to gender as a protected characteristic.

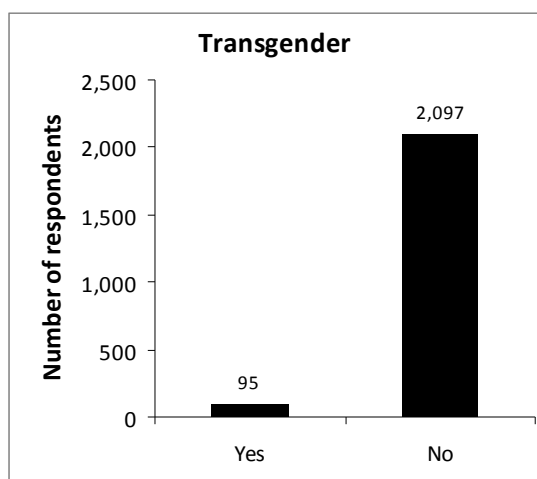
#### **4. Gender reassignment**

People who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex have the protected characteristic of gender reassignment. A summary of data on gender reassignment is set out in the box below.

##### **Data summary for gender reassignment**

- in 2006-07 Lewisham Council commissioned a research study of the LGBT populations who lived, worked, studied or socialised in the borough;
- of the 316 respondents, seven identified as trans-people, which was insufficient to draw quantitative conclusions;
- according to the NHS Secondary User Service Admitted Patients database, there were four admissions to NHS hospitals in 2011-12 of four different individuals resident in Lewisham and having a primary diagnostic code beginning F64 (gender identify disorder). Only one of these was for a full (male to female) gender reassignment. None of the admissions was to Lewisham Hospital.

The graph below shows a breakdown by gender re-assignment of the respondents to the parking survey.



Analysis of responses to key parking survey questions by the protected characteristic of gender reassignment, revealed the following findings:

- Over half (58%) of survey respondents, with the protected characteristic of gender reassignment, currently reside in a CPZ. Of these, under half (43.6%) felt that the “current parking controls in their area met their needs”.
- Just under 30% of respondents with the protected characteristic of gender reassignment, that do not live within a CPZ, indicated that parking controls were needed in their area.

Analysis of the available qualitative feedback on parking has not highlighted any issues that have been specifically attributed to gender re-assignment as a protected characteristic.

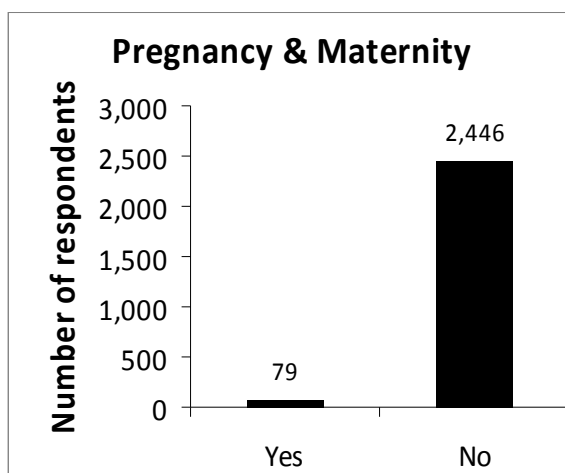
## 5. Pregnancy and maternity

Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding. A summary of data on pregnancy and maternity is set out in the box below.

### **Data summary for pregnancy and maternity**

- for 2011 there were about 5,200 new babies recorded as Lewisham residents;
- Lewisham has an underlying population growth arising from its excess of births over deaths. In a typical year, there are more births (approximately 4,500-5200) than deaths (approximately 1,500-1,800) in Lewisham residents;

The graph below shows a breakdown by pregnancy and maternity of the respondents to the parking survey.



Analysis of responses to key parking survey questions by the protected characteristic of pregnancy and maternity, revealed the following findings:

- Almost three-quarters (74.7%) of respondents with the protected characteristic of pregnancy and maternity, live within a CPZ. Of these, around one-third (33.9%) agreed that *“the current parking controls in their area met their needs”*.
- Half (50%) of respondents with the protected characteristic of pregnancy and maternity, that do not live within a CPZ, indicated that parking controls were needed in their area. However, this was a very low sample size and so should be considered with appropriate caution.
- Over two-fifths (41.6%) of respondents with the protected characteristic of pregnancy and maternity, disagreed or strongly disagreed with the statement that *“the visitor parking permits currently offered by the Council meet my needs”*. This is slightly higher than the 36% average across all survey respondents to this question.
- Just over three-fifths (61.9%) of respondents with the protected characteristic of pregnancy and maternity, disagreed or strongly disagreed with the statement that *“current CPZs support residents to receive visitors”*. This is much higher than the 52.2% average across all survey respondents to this question.

Analysis of the available qualitative feedback on parking has highlighted a number of key issues that have been specifically attributed to pregnancy and maternity as a protected characteristic. These have been summarised below:

- Costs of visitor permits excessive in relation to child-minding costs;
- Charges hugely expensive for those people who need to use child-care at home, even for a few hours a day;
- Inability to purchase both a resident parking permit and a carers' parking permit, yet require family help with child-care on a regular basis;

- More parent and child spaces are needed in car parks.

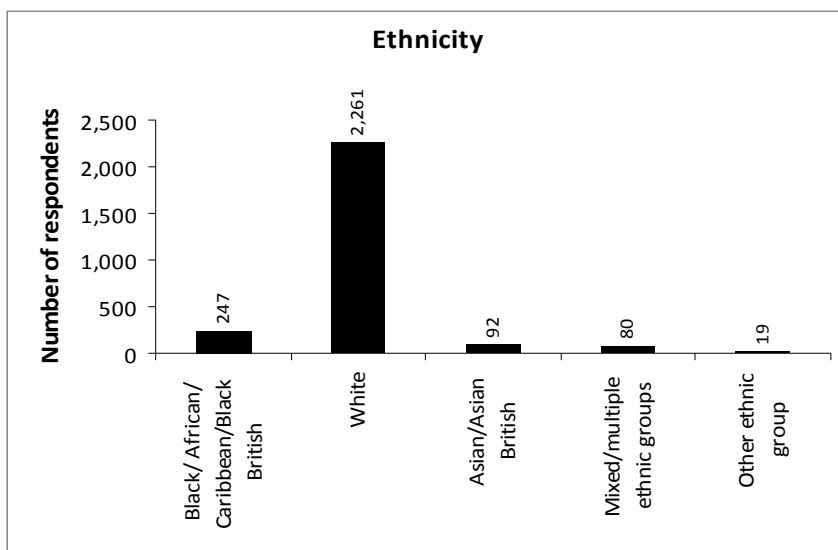
## 6. Race

Race refers to the equality group of race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. A summary of data on race is set out in the box below.

### Data summary for race

- according to the 2011 Census, 53.68% (147,686) of all Lewisham residents are white (White British, White Irish, White Gypsy or Irish Traveller, and White Other);
- people from a Black Caribbean, Black African and other Black ethnic background represent 27.2% (74,942) of the population;
- people from an Indian, Pakistani, Bangladeshi, Chinese and other Asian background represent 9.3% (25,534) of Lewisham's population.

The graph below shows a breakdown by race of the respondents to the parking survey.



Analysis of responses to key parking survey questions by the protected characteristic of race, revealed the following findings:

- Significantly more Black African (81.1%) and Black Caribbean (78.8%) respondents stated that “supporting the most vulnerable residents” should be of high importance to the Council when deciding its’ parking priorities, compared to White respondents (70.3%).



- Significantly more Asian respondents (62.7%) stated that “helping good relations between neighbours” should be of high importance to the Council when deciding its’ parking priorities, compared to White respondents (48.6%).
- Of the total respondents in each of the following ethnic groups: Asian, Black and White, there was a higher percentage of Asian (67%) respondents living in a CPZ, than Black (63%) or White (56.7%) respondents.
- Of those living within a CPZ, Black (39%) respondents were less likely to indicate that “current parking controls in their area met their needs”, compared to Asian (47.5%) or White (49.8%) respondents
- Of those not living in a CPZ, Black (16.8%) respondents were less likely to think that “parking controls were needed in their area” compared to White (26.8%) or Asian (23.3%) respondents.
- Fewer Black (8.5%) respondents agreed or strongly agreed that “current charges for parking permits are reasonable in the borough”, when compared to Asian (12.6%) or White (18.1%) respondents.

Analysis of the available qualitative feedback on parking has highlighted one issue that has been specifically attributed to race as a protected characteristic. This has been summarised below:

- During the Council’s consultations on parking issues, alternative provision should be made for those residents for whom English is not a first language.

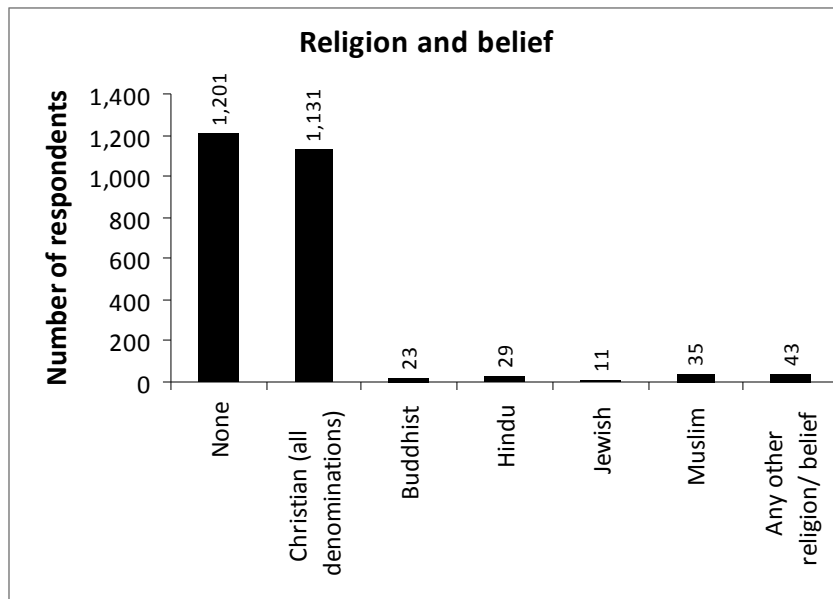
## **7. Religion or belief**

Religion has the meaning usually given to it, but belief includes religious and philosophical beliefs including lack of belief. Generally, a belief should affect your life choices or the way you live for it to be included in the definition. A summary of data on religion and belief is set out in the box below.

### **Data summary for religion or belief**

- according to the 2011 Census, 63.8% (176,225) of Lewisham residents described themselves as having a faith or religion, 27.2% (75,155) described themselves as having no faith or religion, whilst 8.9% (24,505) did not state a religion;
- amongst those residents that described themselves as having a faith or religion, 52.8% (145,588) identified their faith as Christian, whilst 6.4% (17,759) described themselves as Muslim;
- of other religions, Hindus represent 2.4% (6,562) of the population, whilst Buddhists represent 1.3% (3,664) of the population.

The graph below shows a breakdown by religion or belief of the respondents to the parking survey.



Analysis of responses to key parking survey questions by the protected characteristic of race, revealed the following findings. Please note however, that for all non-Christian faiths, the sample size was small and so results should be treated with appropriate caution:

- The majority of respondents (90.9%), who indicated they were of the Jewish faith, do not live in a CPZ. For all other respondents, indicating a faith, at least two-thirds (per faith) lived within a CPZ.
- The majority of Sikh (75%) and Buddhist (73.3%) respondents indicated that current parking controls in their CPZ met their needs, compared to a minority of Christian (45.6%) respondents.
- More Muslim (72.7%) respondents stated that “supporting the most vulnerable residents” should be of high importance to the Council when deciding its’ parking priorities, compared to Buddhist (50%), Sikh (50%) and Hindu (53.6%) respondents.
- More Sikh (83.3%) and Jewish (63.6%) respondents stated that “helping good relations between neighbours” should be of high importance to the Council when deciding its’ parking priorities, compared to Buddhist (36.4%) respondents. The majority of Christian (53.7%) respondents felt that this should be of high importance to the Council when deciding its’ parking priorities.
- More Buddhist (40.9%) respondents agreed or strongly agreed that “the visitor parking permits currently offered by the Council meets their needs”, compared to Hindu (29.6%), Christian (25.4%) and Muslim (21.9%) of respondents.
- No Sikh (0%) respondents agreed or strongly agreed that the “current CPZs support residents to receive visitors”, compared to Muslim (19.4%), Christian (17.8%) and Hindu (16%) respondents.

- Fewer Muslim (2.9%) respondents agreed or strongly agreed that the “current charges for parking permits are reasonable in the borough” compared to Jewish (18.2%), Sikh (16.7%) and Christian (16.1%) respondents.

Analysis of the available qualitative feedback on parking has not highlighted any issues that have been specifically attributed to religion or belief as a protected characteristic.

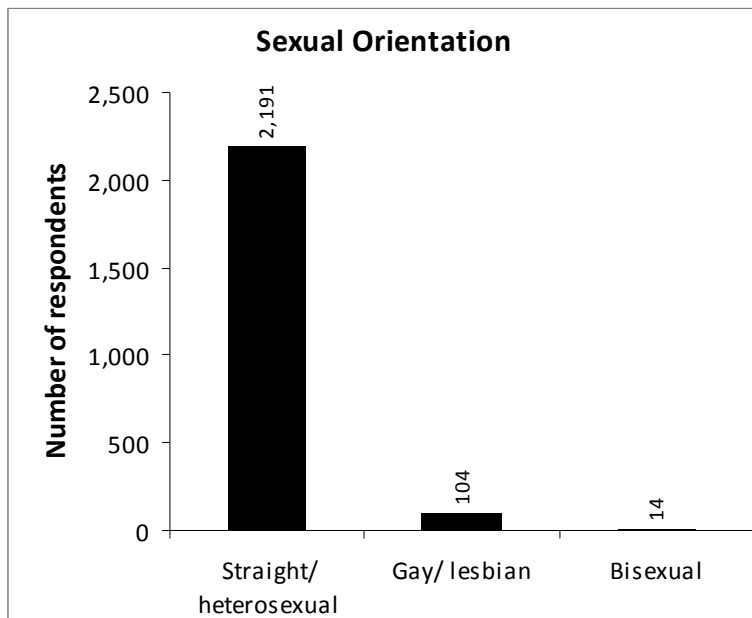
## 8. Sexual orientation

Sexual orientation is defined as whether a person's sexual attraction is towards the opposite sex, their own sex or to both sexes. A summary of data on sexual orientation is set out in the box below.

### Data summary for sexual orientation

- in 2007, a question on sexual orientation was added to the Council's Annual Resident Survey for the first time. The results showed that out of 1,042 respondents 92% identified themselves as heterosexual/ straight, whilst 2% identified as being lesbian, gay, or bisexual (LGB);
- in the 2012 Annual Resident Survey, the same question was asked and out of a total of 1,013 people, 97% identified themselves as heterosexual/ straight and 1% identified as being LGB.

The graph below shows a breakdown by sexual orientation of the respondents to the parking survey.



Analysis of responses to key parking survey questions by the protected characteristic of sexual orientation, revealed the following findings:

- Over half (54.8%) of survey respondents, who indicated that they were either gay or lesbian, currently reside in a CPZ. Of these, over half (55.4%) felt that the “current parking controls in their area met their needs”, which was much higher than the survey average of 46.9%.
- Almost one-third (31.9%) of gay or lesbian respondents, that do not live within a CPZ, indicated that parking controls were needed in their area, which again was higher than the survey average of 25.6%.
- The percentage of households where respondents indicated that they were gay, lesbian or bisexual and do not own a vehicle, was 16.1%, compared with 5.6% of heterosexual households.
- Fewer gay and lesbian respondents (22.9%) agreed or strongly agreed that “car parks feel safe and secure” compared to heterosexual respondents (31%).
- Analysis of the available qualitative feedback on parking has not highlighted any issues that have been specifically attributed to sexual orientation as a protected characteristic.

## **Conclusion**

The adoption and implementation of the proposed parking policy recommendations contained within this report, should pay due regard to the equality considerations highlighted in this assessment, to ensure that the council is compliant with its statutory obligations under the Equality Act 2010 and the equality objectives of the Comprehensive Equalities Scheme 2012-2016.

The Council will continue to consider the impact on all protected characteristics during the ongoing development and implementation of its’ parking policy throughout 2013 and beyond. Where appropriate it will undertake additional engagement with the community or more detailed equality analysis where the possibility of negative impacts on specific protected characteristics are identified .