

Name of proposal	LB Lewisham Parking Policy
Lead officers	Alexandra Crush and Jonathan Fish
Other stakeholders	
End date of Equality Analysis	December 2019
Step 1: Identify why you are undertaking an Equality Analysis	
<p>This Equality Analysis Assessment (EAA) has been provided by Waterman Infrastructure and Environment Ltd on behalf of the London Borough of Lewisham. WSP Indigo have undertaken the technical assessment of equalities.</p> <p>The purpose of the EAA is to assess the impact on protected groups within the borough of the proposed Lewisham Parking Policy update.</p> <p>The EAA supports the report to Mayor and Cabinet dated 15 January 2020 and builds on the high-level assessment of the parking policy as a whole, summarised in paragraph 10.6 of the report.</p>	
Step 2: Identify the changes to your service	
<p>The EAA considers the impacts on protected groups resulting from the proposed updates to the Lewisham Parking Policy. These will assess the recommendations made to the Mayor as follows:</p> <ol style="list-style-type: none"> 1. Introduction of an emissions-based charging scheme 2. Visitor parking credits 3. Penalty Charge Notice pricing 4. Provision of only mandatory disabled parking bays 5. Amendments to application criteria for disabled bays 6. Tariff increases to pay and display parking 7. Rationalisation of pay and display machines 8. Minor amendments to the policy 9. Removal of limit on 'floating car club permits' <p>A qualitative assessment of the impacts of each proposal has been provided in Step 5.</p>	
Step 3: Assessment of data and research	
<p>The EAA has been informed by information on each of the protected groups presented in the Comprehensive Equalities Scheme 2016 to 2020 Data Sift provided by LB Lewisham.</p> <p>We have not undertaken a separate baseline assessment of the preponderance of protected groups across Lewisham as a whole. However, in some instances where particularly relevant to proposed changes to the parking policies, we have identified separate baseline data.</p>	
Step 4: Consultation	
<p>Following consultation with the Sustainable Development Select Committee (SDSC) in December 2018 and the Mayor and Cabinet approval in March 2019, the Council conducted a consultation exercise with the public on key changes to the parking policy. The consultation ran from 10 June 2019 to 2 August 2019 and 3,767 responses were received. Details on the results of this consultation have been included in Appendix 1: Public Consultation Summary.</p>	
Step 5: Impact Assessment	
<p>A qualitative assessment of the impacts of each proposal as outlined in Step 2 has been undertaken.</p> <p>The identified effects have been assessed as either temporary or permanent with a positive, neutral or negative impact. The extent of these effects has also been included, denoted as either minor or major. Where there are multiple impacts for a proposal, an overall assessment has been provided. These impacts have been summarised in Step 6.</p>	

1. Introduction of an emissions-based charging scheme

Changes proposed to the car parking policy aim to encourage the use of efficient vehicles by introducing a banding system for charges, along with applying a £50 surcharge to permits for diesel vehicles. The introduction of an emissions-based charging scheme will promote the shift to more sustainable transport modes. This is likely to benefit protected groups who are disproportionately exposed to negative externalities such as air quality impacts and who are also likely to benefit from health impacts associated with active transport.

While there may be impacts to persons on low incomes as a result of this scheme, as they are not a protected group they have not been considered in this assessment.

It could be assumed however that the uptake of efficient vehicles, in order to not be subject to the additional surcharge, may not be as readily accessible to protected groups. For example, this may have a negative impact on disabled people who use or lease a diesel vehicle that has been specially adapted i.e. a Wheelchair Accessible Vehicle (WAV) due to higher cost of replacement. While this charge will not be applied to disabled parking permits, if disabled residents wish to park outside an assigned disabled parking bay, a CPZ permit subject to the emissions-based charging scheme will need to be purchased.

Through correspondence with Officers at LB Lewisham during this equalities assessment however, it is understood that the incidence of requiring two permits will likely be negligible and that there are numerous schemes implemented by organisations including the Council and TfL to assist disabled persons through this transition period.

Consequently, the policy proposal has been assessed as having a **minor positive permanent impact** on all protected groups with the exception of the disability protected group. Given the potential price increase and issues with readily accessing specialised vehicles in the immediate future, there is the possibility for **minor negative temporary impacts**. In reviewing this policy proposal overall and the relevant positive and negative impacts however, it has been assessed as having a **neutral permanent impact** on protected groups.

Protected Characteristic	Assessed Impact
Age	Minor positive permanent impact
Disability	Minor negative temporary impact
Gender reassignment	Minor positive permanent impact
Marriage and civil partnership	Minor positive permanent impact
Pregnancy and Maternity	Minor positive permanent impact
Race	Minor positive permanent impact
Religion or Belief	Minor positive permanent impact
Sex	Minor positive permanent impact
Sexual Orientation	Minor positive permanent impact

2. Visitor parking credits

The current policy requires that on application to the Council, 10 hours of visitor parking credit is provided through vouchers when a household has at least one annual parking permit. The proposed policy retains the 10 hours of provision but is instead administered via an online app system. These changes make the process more transparent and easier for people to access, ultimately making it a fairer system which will allow for a greater take up of the scheme. It is therefore anticipated that the automatic application of the parking credits will have a positive impact on the community, including those within protected groups.

It could be argued that the use of the online system will have an impact on users with limited computer literacy or restricted access to a computer, which may be more likely to include disabled groups (such as the blind) or elderly protected groups. The impacts of this have been addressed by

the proposed policy which notes that vouchers will remain in use for affected people who may prefer to continue using the voucher system.

Likewise, while there is a commonly held belief that older residents are less likely to benefit from a fully online payment system, evidence from other London Boroughs suggests that cashless payment have increased across drivers all age groups. For example, in Southwark Council's 2019 Equalities and Health Impact Assessment for *Car Parking Charges in Park Car Parks*, it was noted that there was no apparent age pattern in the usage of car parking apps such as PaybyPhone to pay for street parking in the borough.

The current policy also provides a book of visitor parking permits free of charge to any residents in CPZs who are over 60, and in receipt of Council Tax support, and do not have another parking permit per annum. The proposed policy retains this initiative; therefore, it does not detrimentally impact the elderly who may be receiving this benefit.

Consequently, the proposed changes to visitor parking credits would likely result in a **neutral permanent impact** on the disabled and elderly and a **minor positive permanent impact** on all other protected groups. Overall, Policy Proposal 2 has been assessed as the potential to have a **neutral permanent impact**.

Protected Characteristic	Assessed Impact
Age	Neutral permanent impact
Disability	Neutral permanent impact
Gender reassignment	Minor positive permanent impact
Marriage and civil partnership	Minor positive permanent impact
Pregnancy and Maternity	Minor positive permanent impact
Race	Minor positive permanent impact
Religion or Belief	Minor positive permanent impact
Sex	Minor positive permanent impact
Sexual Orientation	Minor positive permanent impact

3. Penalty Charge Notice Pricing

Lewisham's current policy on pricing for penalty charge notices allows for lower charges for those parking in areas south of the A205 (the South Circular). The proposed policy suggests that pricing is made consistent across the whole borough, with areas south of the A205 seeing an uplift in charges to match the existing rates to the north.

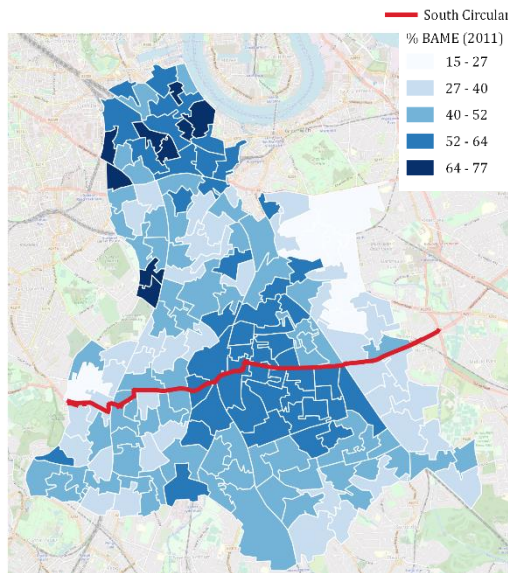
Whether changes to the penalty charge scheme will have a minor disproportionate effect on any protected groups is dependent on a number of factors. For example, a negative impact would be contingent on whether the composition of those being penalised resembles that of the general population and whether the new policy would result in the same number of charges or whether the violation rate would reduce in response to the increase in charges.

Equally, a motivation behind the harmonisation of penalty charges was to avoid a significant increase in illegal parking activity in the area south of the A205 at the point of introduction of the ULEZ in 2021. Given that the area south of the A205 is outside of the ULEZ, a cheaper penalty charge may have led to the area becoming a preferred location for illegal parking, leading to less availability for protected groups within that area. It is not inconceivable that, if an effective deterrent, Proposal 3 could help to prevent parking effects which might have a disproportionate negative impact on protected groups. Consequently, this may result in a **minor positive permanent impact** to all protected groups.

To review this in more detail, a spatial assessment of selected protected groups in LB Lewisham is set out across the following three figures, which shows the distribution of protected groups by Lower-layer Super Output Area (LSOA) relative to the route of the A205, which runs east-west across the borough. For the purposes of this assessment, we have assumed that these policies are

unlikely to have a pronounced or disproportionate impact on protected groups other than ethnic minority groups, the elderly and the disabled.

Figure 1: Lewisham LSOAs by the % of residents from BAME groups (2011 Census)



As set out in Figure 1, it is apparent that Black and Minority Ethnic (BAME) groups represent a large portion of the population in certain neighbourhoods south of the A205, such as the Catford South ward. However, as a sum of its parts, the area is not notably different in its composition from the segment of Lewisham north of the A205. Both areas contain neighbourhoods which have very large BAME communities, such as Evelyn and New Cross wards north of the A205, and neighbourhoods which are more representative or lower than the average across London, such as Brockley.

As such, while it is possible that some ethnic minority groups will be negatively affected by the penalty charge fee uplift, there is no evidence of the policy having a disproportionate impact on BAME groups.

Figure 2: Lewisham LSOAs by the % of residents who are over the age of 65 (2015)

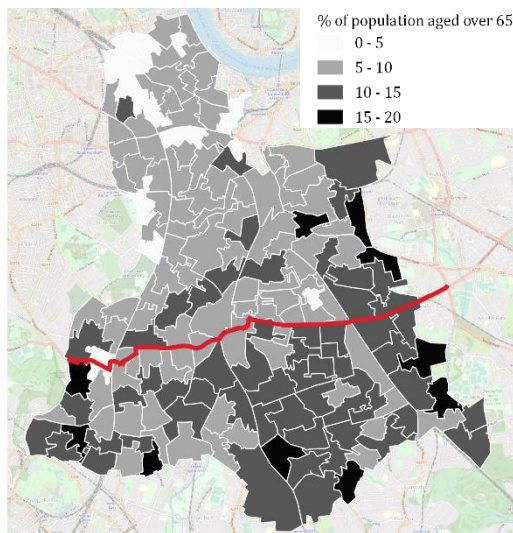
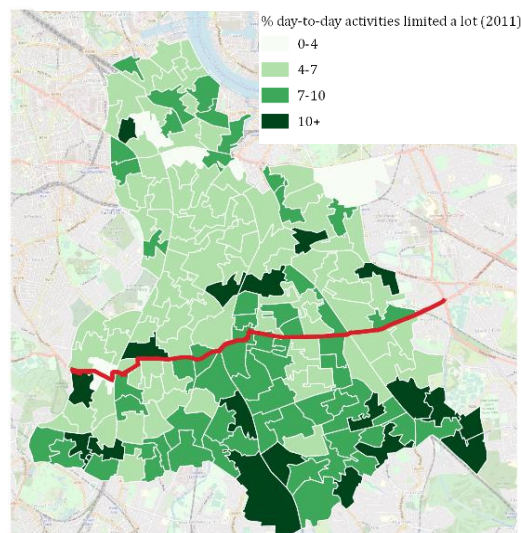


Figure 3: Lewisham LSOAs by the % of residents who identified their day-to-day activities as being "limited a lot" (2011 Census)



However, it is notable that while the share of the population who are children (under the age of 16) is fairly evenly distributed throughout the borough with no pattern distinguishing the areas north and south of the A205, the share of the population who are over the age of 65 as of 2015 is markedly higher in wards south of the A205.

Equally, as of the 2011 Census, a markedly higher share of the population south of the A205 described their day-to-day activities as being "limited a lot" compared to the population north of the A205. While this is not necessarily a precise indicator of health, when combined with other metrics, such as the share of the population who claimed the Disability Living Allowance in Summer 2013

(prior to its discontinuation), it indicates that there is a discernible difference in the share of the population who experience health problems north and south of the A205.

As such, assuming that parking habits by age group and ability are consistent across the borough, there may be a **minor negative permanent impact** on older residents or the disabled as they are more likely to reside south of the A205 where penalty charges will be raised. It should be remembered however, that this increase is in relation to illegal activity and therefore the extent of this impact is not known due to a lack of information available on the age or disability breakdown of parking offenders. Consequently, this has been assessed overall as having a **neutral permanent impact** on the elderly and disabled as it is in relation to unlawful activities.

In assessing the changes overall and the evident positives and negative impacts, it is therefore assumed that the introduction of higher penalty charge fees south of the A205 could result in a **neutral permanent impact** on protected groups.

Protected Characteristic	Assessed Impact
Age	Neutral permanent impact
Disability	Neutral permanent impact
Gender reassignment	Minor positive permanent impact
Marriage and civil partnership	Minor positive permanent impact
Pregnancy and Maternity	Minor positive permanent impact
Race	Minor positive permanent impact
Religion or Belief	Minor positive permanent impact
Sex	Minor positive permanent impact
Sexual Orientation	Minor positive permanent impact

4. Provision of only mandatory disabled parking bays

At present, LB Lewisham provides both enforceable parking bays and advisory parking bays which can be used by non-disabled drivers. Policy Proposal 4 would see all disabled parking bays in Lewisham become mandatory, enforceable parking bays as per changes in the Traffic Signs Regulations and General Directions 2016.

The implementation of Policy Proposal 4 would see a net reduction in the total number of on-street parking spaces which are designated for disabled people, as a number of advisory disabled parking bays would be removed rather than automatically reclassified as mandatory disabled bays.

However, the reclassification of a significant share of advisory parking bays to mandatory and enforceable bays would increase the number of spaces which are exclusively available to disabled drivers. As such, it is anticipated that Policy Proposal 4 will have a **neutral permanent impact** on the disability protected group.

Protected Characteristic	Assessed Impact
Age	N/A
Disability	Neutral permanent impact
Gender reassignment	N/A
Marriage and civil partnership	N/A
Pregnancy and Maternity	N/A
Race	N/A
Religion or Belief	N/A
Sex	N/A
Sexual Orientation	N/A

5. Amendments to application criteria for disabled bays

Policy Proposal 5 would see changes to the criteria against which disabled parking bays are allocated, with an assessment of medical need from a qualified professional now required in order

to be allocated a mandatory parking bay.

To qualify for such a space, an applicant would need to be an existing blue-badge holder, in receipt of one of several disability benefits and either the driver of the vehicle or living at the same address as the driver. The purpose of this policy is to give special priority to those with severe mobility issues and to ensure that people with the most need are allocated a mandatory bay. This would be an improvement from the previous policy as many disabled people who would have had an advisory parking bay near their homes will now have a mandatory bay in closer proximity instead. This would also mean that, for example, a parent/carer of a child accompanied by bulky medical apparatus could qualify under the proposed new criteria where previously they would not. This will provide a **minor positive permanent impact** for disabled people.

In addition, the allocation of specific disabled parking bays would be informed by an assessment of the location of the parking space to determine whether a disabled bay is physically possible.

The new requirements however are more stringent than earlier policies meaning a small number of disabled drivers without severe mobility issues may experience a negative change to their daily routine, in that they may not qualify for a disabled parking place near their property under the new policy, consequently having less of a choice of car parking space.

In instances where disabled residents are currently eligible for designated bays but would not qualify under the new policy, it is likely that they would experience a **minor permanent negative impact** as a result of this change.

While the criteria for being assigned a disabled parking bay has marginally narrowed, there will be added benefits to persons with the greatest need. In balancing the positive and negative impacts overall, this Policy Proposal 5 has been assessed to have a **neutral permanent impact** on the disability protected group.

Protected Characteristic	Assessed Impact
Age	N/A
Disability	Neutral permanent impact
Gender reassignment	N/A
Marriage and civil partnership	N/A
Pregnancy and Maternity	N/A
Race	N/A
Religion or Belief	N/A
Sex	N/A
Sexual Orientation	N/A

6. Tariff increases to pay and display parking

2011 Census data demonstrates that 45% of LB Lewisham residents own a car, indicating that most residents use means other than a privately-owned vehicle for transportation. While details on the breakdown of vehicle use for protected groups is not evident, it can be assumed that a proportion of persons within each group are already using alternative methods of transport, therefore diluting the potential impacts.

The price increases proposed raise the charge from £1.40 to £2.00 per hour, representing a 43% increase. This rise in price is the first since 2011. Using the Bank of England inflation calculator, inflation averaged 2.6% per year since 2011, therefore placing the approximate cost of parking in 2020 at £1.86. Consequently, the price increase proposed by LB Lewisham is a minor increase, representing 7% more than the inflated estimation. Equally, the increased cost of pay-and-display parking would still be significantly cheaper than the lowest rates in neighbouring boroughs - £2.80 across much of RB Greenwich and between £2.75 and £6 across LB Southwark.

Price increases may potentially have a negative impact on people unable to easily shift their transport modes such as parents with prams due to potential issues of mobility on public transport during peak times. This would also be true of disabled persons in wheelchairs, however they do not

have to pay for parking. While there is the potential for negative impacts upon parents, the price increase is negligible. Furthermore, LB Lewisham vehicle ownership rates highlight that it is likely that most parents with young children are already relying on alternative transport means.

Additionally, the positive impacts resulting in a shift to more sustainable transport through the disincentivizing of private vehicles will have a positive impact on young children who are disproportionately exposed to negative externalities such as air quality impacts resulting from excessive car usage.

Consequently, it has been assessed that pay and display charge increases will likely have a **neutral permanent impact** on pregnancy and maternity and age protected groups.

Protected Characteristic	Assessed Impact
Age	Neutral permanent impact
Disability	N/A
Gender reassignment	N/A
Marriage and civil partnership	N/A
Pregnancy and Maternity	Neutral permanent impact
Race	N/A
Religion or Belief	N/A
Sex	N/A
Sexual Orientation	N/A

7. Rationalisation of pay and display machines

Prior to the recent proposals, two different car parking charges were applied in the borough, with pay and display parking charged at £1.40 per hour if paid for using machines and an additional 20p applied if paid online.

Policy Proposal 7 suggests a flat hourly rate of £2.00 or £0.50 per 15-minute increment irrespective of payment method, which would mean an increase in £0.60 for cash payments throughout the borough. This policy will also be accompanied by a rationalisation of the number of pay and display machines across LB Lewisham.

The policy proposal will result in a marginal increase in the price of parking in the borough. The intention of the policy is partly to remove any additional fees associated with cashless payment and as a means of encouraging more sustainable means of transport. Equally, normalising cashless payment is a means towards ensuring that public money is not inefficiently spent, in that investment in new pay and display machines may prove to be a misallocation of funds in a time when cashless payments are increasingly popular (as set out in the Parking Policy Update from 27 March 2019).

For reasons set out in response to Policy Proposal 2, it is not anticipated that the move towards encouraging cashless, online payments will have a disproportionate negative impact on older drivers.

In terms of the likely impact on low-income groups in the borough, which in certain parts of the borough would encompass protected ethnic minority groups, the increase in the cost of pay-and-display parking is marginal. Equally, as discussed in Policy Proposal 6, the increased cost of pay-and-display parking would still be cheaper than the lowest rates in neighbouring boroughs.

It has therefore been assessed that Policy Proposal 7 is unlikely to have a disproportionate impact on any group protected under the Equality Act 2010, and as such represents a **neutral permanent impact**.

Protected Characteristic	Assessed Impact
Age	Neutral permanent impact
Disability	Neutral permanent impact

Gender reassignment	Neutral permanent impact
Marriage and civil partnership	Neutral permanent impact
Pregnancy and Maternity	Neutral permanent impact
Race	Neutral permanent impact
Religion or Belief	Neutral permanent impact
Sex	Neutral permanent impact
Sexual Orientation	Neutral permanent impact

8. Minor amendments to the policy

The minor amendments to the policy have been outlined in the bullet points below. For ease of communication, these have been assigned a letter from a through to j.

- a) Making all parking permits available as virtual permits, where they are not already currently, reducing the need to issue paper permits:

This proposal may impact people with low computer literacy, most likely the elderly or people with disabilities. Despite this, the Council have acknowledged that the use of vouchers shall remain for those who require it. Consequently, this proposal will likely result in a **neutral permanent impact** on the elderly and disabled.

- b) Development and implementation of a new IT system for citizens to purchase/ renew parking permits and visitor permits:

This proposal may impact people with low computer literacy, most likely the elderly or people with disabilities. Despite this, the Council have acknowledged that the use of vouchers shall remain for those who require it. Consequently, this proposal will likely result in a **neutral permanent impact** on the elderly and disabled.

- c) Update references to key policy documents including the Mayor's Transport Strategy (2018), the Council's Transport Strategy and Local Implementation Plan 2019-2041 (LIP3), and the Lewisham Air Quality Action Plan (2016-2021):

The proposed changes to wording within the policy has been assessed as not resulting in any impacts to protected groups.

- d) Include a section on the new floating car club permit agreed at Mayor and Cabinet in December 2018:

This change will likely result in a **major positive permanent impact** on protected groups. This is discussed in detail as part of Policy Proposal 9.

- e) Include a section on the new anti-idling enforcement measures agreed at Mayor and Cabinet in September 2019:

The reduction of idling will result in an improvement in air quality. This is likely to benefit protected groups who are disproportionately exposed to negative externalities such as air quality impacts. Consequently, this change will likely result in a **major positive permanent impact** on protected groups.

- f) Include a new process for implementation of School Keep Clears as they no longer require a TMO in London:

The proposed policy removes the requirement for a Traffic Management Order (TMO) for School Keep Clear markings throughout the borough. The changes mean that the process for implementing alterations to the School Keep Clears will be streamlined. Furthermore, the policy states that any new or proposed alterations will be made during school holidays and shall involve prior consultation with residents and the school. Consequently, this amendment will allow for the efficient implementation of School Keep Clears, likely enhancing the safety of parents and children in the vicinity of schools throughout

Lewisham. As a result of these changes, there will likely be a **minor positive permanent impact** to the age and pregnancy and maternity protected groups.

- g) Update of the text for crossovers to match current planning policy;

The proposed changes to wording within the policy has been assessed as not resulting in any impacts to protected groups.

- h) Update the maximum loading time on yellow lines from 20 to 40 minutes. This is the standard for London and set by London Council's guidance and current TMOs;

It has been assessed that proposed updates to loading times will not result in any impact to protected groups.

- i) Update the text for motorcycle parking in CPZs so that motorcycles may park free of charge within marked bays so long as they are perpendicular to the kerb, or where a marked bay is on or partially on the footway, so long as they are parked wholly within the bay;

It has been assessed that proposed updates to motorcycle parking arrangements will not result in any impact to protected groups.

- j) Set out new criteria for assessment and prioritisation of minor parking projects, such as new parking bays or yellow line restrictions. These criteria will include requests from the public, road safety, technical need, supporting local business; and traffic flow and access. The proposed criteria are set out in Appendix 7 to this report;

The new criteria set out in Appendix 7 simplifies the process of implementing minor parking projects. It gives weight to schemes prioritised by public or Councillor requests by accounting for public correspondence in the assessment of project prioritisation. While this gives greater authority to the community in the requesting of parking changes, there is the potential for a lack of involvement of protected groups in this process. Protected groups may be less likely to request changes to parking provision due to a lack of perceived empowerment, language or other barriers.

Despite this, the criteria do allow for minor parking projects to be promoted based on need and allows for greater transparency and community involvement in the process. Through correspondence with Officers at LB Lewisham it is our understanding that alternative mechanisms for submitting paper-based comments will be available to residents as part of this programme. It is recommended that the consultation methods and processes are reviewed to ensure they can be engaged with by a range of different people, including those within protected groups.

Through the consideration of the proposed changes, there will likely be a **neutral permanent impact** on all protected groups.

- k) Revision to the prioritisation process for informal consultation on Controlled Parking Zones (CPZs) based on experience, feedback and updates to Council policy. This will provide a two-stage process with areas identified from public requests and survey data, including from a proposed borough wide survey to help determine parking need, being taken forward to a second stage of prioritisation. The programme for CPZ consultations would be prioritised by criteria including the number of requests received, the presence of key parking generators such as local centres and transport hubs, recent review or extension of Controlled Parking Zones, upcoming new developments or transport proposals (such as ULEZ or Healthy Neighbourhoods), and other factors linked to achieving the objectives of the Council's transport strategy. The proposed criteria are set out in Appendix 8 to this report.

The new criteria set out in Appendix 8 allows for an additional 'informal' avenue of assessing and prioritising CPZs. The first stage relies on requests made by the public either through surveys, requests or representations. While this gives weight to public opinion on the matter of CPZ designation, some protected groups may have difficulties in making their views known. Protected groups may be less likely to participate in surveys or community representative organisations due to barriers such as language, disability or perceptions of empowerment.

Despite this, the CPZ criteria does allow for the urgent amendment of CPZs in response to extraordinary or acute issues regarding safety or access. Consequently, where impacts to protected groups are identified, the process can be expedited. Furthermore, the introduction of the survey provides an additional means of communicating resident's desires for a CPZ which is to be more widely accessible and arguably easier to complete for many people rather than writing a letter to the Council.

Through the consideration of the proposed changes, there will likely be a **neutral permanent impact** on all protected groups.

Overall assessment

The impacts arising from the minor policy amendments set out within Proposal 8 have been assessed overall as likely having a **neutral permanent impact** on protected groups.

Protected Characteristic	Assessed Impact
Age	Neutral permanent impact
Disability	Neutral permanent impact
Gender reassignment	Neutral permanent impact
Marriage and civil partnership	Neutral permanent impact
Pregnancy and Maternity	Neutral permanent impact
Race	Neutral permanent impact
Religion or Belief	Neutral permanent impact
Sex	Neutral permanent impact
Sexual Orientation	Neutral permanent impact

9. Removal of limit on 'floating car club permits'

Floating car clubs are becoming popular as they offer alternatives to people who are either unable or do not wish to own their own vehicle. This means that car use is available to a broader range of people and enables a more efficient use of the vehicles. The current policy allows for a specific type of 'floating car club permit' which is applied for by the operators and subject to approval by Officers. The current policy limits these permits to 200 overall.

The research undertaken for the revised car parking policy identified increased usage of floating car clubs in the borough. Consequently, the revised policy recommends the removal of the permit limit, along with enabling more operators to function in Lewisham; broadening the offer to those who live, work and visit the borough.

This proposal will deliver heightened accessibility to vehicles, allowing a broader range of people to have a wider offering of transport modes. Furthermore, the use of floating car clubs will result in an overall reduction in car use which is likely to benefit protected groups who are disproportionately exposed to negative externalities such as air quality impacts.

Consequently, the removal of the limit on floating car club permits will result in a **major positive permanent impact** on protected groups.

Protected Characteristic	Overall Assessed Impact of Proposals
--------------------------	--------------------------------------

Age	Major positive permanent impact
Disability	Major positive permanent impact
Gender reassignment	Major positive permanent impact
Marriage and civil partnership	Major positive permanent impact
Pregnancy and Maternity	Major positive permanent impact
Race	Major positive permanent impact
Religion or Belief	Major positive permanent impact
Sex	Major positive permanent impact
Sexual Orientation	Major positive permanent impact

Step 6: Decision/ Result

Summary tables have been provided below which set out the anticipated outcomes of each policy proposal contained within the updates, as well as the anticipated overall impact on each protected group identified in the Equality Act 2010.

	Proposal	Impact	Extent	Period	Protected group
1	Introduction of an emissions-based charging scheme	Neutral	N/A	Permanent	All
2	Visitor parking credits	Neutral	N/A	Permanent	All
3	Penalty Charge Notice pricing	Neutral	N/A	Permanent	All
4	Provision of only mandatory disabled parking bays	Neutral	N/A	Permanent	Disability
5	Amendments to application criteria for disabled bays	Neutral	N/A	Permanent	Disability
6	Tariff increases to pay and display parking	Neutral	N/A	Permanent	Pregnancy and Maternity Age
7	Rationalisation of pay and display machines	Neutral	N/A	Permanent	All
8	Minor amendments to the policy	Neutral	N/A	Permanent	All
9	Removal of limit on 'floating car club permits'	Positive	Major	Permanent	All

Protected Characteristic	Overall Assessed Impact of Proposals
Age	Neutral
Disability	Neutral
Gender reassignment	N/A
Marriage and civil partnership	N/A
Pregnancy and Maternity	Neutral
Race	N/A
Religion or Belief	N/A
Sex	N/A
Sexual Orientation	N/A

Overall, the LB Lewisham Parking Policy aims to disincentivise the use of private vehicles to promote more sustainable methods of transport. The benefits associated with the increased use of public and active transport along with the decrease in heavy polluting vehicles is widespread and has the potential to improve the quality of life of protected groups. This is particularly valuable as

negative externalities such as air quality impacts are often disproportionately experienced by protected groups.

The EAA has identified positive, neutral and negative impacts associated with each of the policy proposals. Overall, this has evaluated that there are neutral impacts anticipated for the age, disability and pregnancy & maternity protected groups as a result of the implementation of the LB Lewisham Parking Policy.

Step 7: Equality Analysis Action Plan

Any future modifications or mitigation measures arising from the implementation of the Parking Policy should be influenced by the analysis set out in this report.