

Appendix E – Motorcycle Parking Charge Equality Analysis Assessment

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Date	12 th January 2022	Service	Parking

1. The project or decision that this assessment is being undertaken for

This Equality Analysis Assessment is being completed as part of the proposal to implement motorcycle parking charges within the borough. The aim of this proposal is to encourage the uptake of less polluting vehicles, which will reduce carbon emissions in the borough, and therefore improve Lewisham’s air quality.

2. The protected characteristics or other equalities factors potentially impacted by this decision

<input checked="" type="checkbox"/> Age	<input type="checkbox"/> Ethnicity	<input type="checkbox"/> Maternity	<input checked="" type="checkbox"/> Language spoken	<input checked="" type="checkbox"/> Other, please define: <i>motorcyclists, delivery drivers / riders</i>
<input type="checkbox"/> Gender	<input type="checkbox"/> Gender identity	<input checked="" type="checkbox"/> Disability	<input type="checkbox"/> Household type	
<input type="checkbox"/> Religion	<input type="checkbox"/> Carer status	<input type="checkbox"/> Sexual orientation	<input checked="" type="checkbox"/> Income	

Age

Age refers to a person belonging to a particular age or age range. As an employer and a provider of services the Council is required to ensure that it does not unlawfully discriminate against a person on account of their age.

Data summary for age

- our data profile on the age of Lewisham’s population (based on official statistics) shows that some 65,000 residents are aged between 0-19 years (25 per cent of the population);
- in contrast men and women aged over 60 total some 41,400 (15.5 per cent of the population);
- official statistics also show that by 2021 residents aged 30-44 will still be the most numerous, however those aged between 50-69 will see the biggest increase in their numbers (up from 16 per cent in 2011 to 19 per cent of the overall population in 2021);
- the Council’s workforce profile for 2010-11 reveals that 35 per cent of Council employees are aged between 45-54; 23 per cent are aged between 35-44; 22 per cent are aged 55 or over; 16 per cent are aged between 25-34 and 2 per cent are aged between 16-20.

As motorcycle permits would be managed via the Council’s online parking permit system, this protected characteristic group would need to be taken into account. It would need to be communicated that there would be other channels available in order to obtain motorcycle permits, such as calling the permits department.

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

- Lewisham’s data file on disability is based on the 2001 Census data, which showed that 15.6 per cent 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 is slightly higher than the London average of 15.5 per cent, but significantly lower than the national average of 18.2 per cent;

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- the 2001 Census also recorded over a quarter of households in Lewisham (29.4 per cent) contain one or more people with a limiting long-term illness or disability, which is lower than the average for England and Wales as a whole where the proportion is 34 per cent;
- according to the 2001 Census, more women than men in Lewisham have a ‘long-term limiting illness’. Going forward, it is reasonable to conclude that as people get older the proportion of Lewisham residents who have a long term illness is also likely to increase;
- in November 2010, 13,050 people in Lewisham were claiming Disability Living Allowance, of which 15.5 per cent had been claiming for less than two years (8.3 per cent claiming for 1-2 years), 19.3 per cent had been claiming for 2-5 years and 65.3 per cent of claimants had been claiming for over 5 years;
- there was very little different in the number of male and female Disability Living Allowance claimants. 14.2 per cent of claimants were children under the age of 16 and 67.7 per cent of claimants were of working age (16-64);
- the Council’s workforce profile for 2010-11 reveals that 6 per cent of employees identify themselves as having a disability.

The Council must consider those with a disability when implementing motorcycle permits. Motorcyclists who hold a Disabled Badge will be eligible to obtain a Motorcycle Disabled Resident Permit. They would also be eligible for a Motorcycle Carer’s Permit.

However, as with other motorists and current policy, they would only be able to obtain one of these.

Income

We would need to consider that those in lower income households may be affected more by the proposed changes than those in higher income households.

The Single Equality Framework 2020-24 Data Sift¹ states that 10.5% of households in the borough are workless, and 9.3% claim Universal Credit, which is higher than that in London and Great Britain.

There may be a positive environmental effect on some lower income households, in that air quality in some of the most congested areas of the borough is expected to improve.

However, considering that motorcycles have always parked free of charge, introducing a fee to park across the borough could negatively impact those on lower incomes.

Language spoken

The Single Equality Framework 2020-24 states that there are 170 languages spoken in the borough, with 20% of the borough stating that English is not their main language². Therefore, it must be considered that a proportion of the borough do not speak English as their main language.

It must be ensured that the proposals are communicated effectively to these residents. Motorcycle users whose main language is not English will need to be particularly considered, as they will need to be made aware of how to purchase the relevant permit, pass, or parking session.

Other protected characteristic groups

¹ [Single Equality Framework 2020-24 Data Sift PDF document can be found on Council website page](#)

² [Single Equality Framework 2020-24 PDF document can be found on Council web page](#)

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The above groups are the ones who will be the most affected by the proposed actions.

The impact on the protected characteristic groups that are not selected would be based on whether they frequently ride a motorcycle throughout the borough and would not be based on their protected characteristic.

Motorcyclist groups

Motorcyclists currently park for free everywhere in the borough³. The proposed changes to implement motorcycle parking charges would have a significant impact on motorcyclists who live and work in Lewisham, as, with the new proposals, they would be expected to pay for parking.

Having consulted with motorcycle lobbyist groups, there have been several changes made to the initial proposals. The group that was highlighted during consultation was delivery riders, and those who are on lower incomes. These groups are to be considered with any proposals going forward.

3. The evidence to support the analysis

A public consultation ran from 9th August to 1st November 2021, in which 26.44% of responders stated that they own a motorcycle and 30.21% own a car or van **and** a motorcycle.

9.05% of responders park in on-street permit holder bays, while 27.85% park on-street without a bay and 14.63% of responders park their motorcycle on a driveway.

When motorcyclists were asked what they usually use their motorcycle for, 40.91% of responders stated that they use their motorcycle to commute. 33.2% stated that they use their motorcycle to visit friends and family, and 24.39% stated that they use their motorcycle to go shopping.

After consultation with motorcycle lobbyist groups, it was stated that motorcycles do not pollute as much as cars, and therefore should be charged more proportionately. They believed that the previously proposed charges for motorcycle business permits were too high for the majority of motorcyclists, and that a daily or weekly business pass should also be considered for those who commute into the borough. This would take into account delivery riders, who perhaps work in several boroughs across London, and the fact that “hybrid-working” has become more prominent as a result of the pandemic.

Through this consultation, it was also mentioned that delivery drivers would be one of the most impacted groups, due to the fact that they pick up food in busy town centres and deliver across the borough. With the increase of delivery services, they are a group that needs to be taken into account.

Summary

When asked how they use their motorcycles, nearly half of all responders stated that they use their motorcycle to commute. This suggests that any new proposals will need to take motorcyclists who commute to the borough into account.

As well as this, nearly a third of responders use their motorcycle to visit friends and family, and considering that there are several Controlled Parking Zones (CPZs) in the borough, visitors will also need to be taken into account.

Nearly a quarter of responders use their motorcycle to shop, which suggests that the need for secure infrastructure, and places to enable motorcycles to park in and around town centres.

Delivery drivers particularly need to be taken into account as they deliver across the borough.

4. The analysis

What the findings tell us

³ [Motorcycle Parking in Lewisham Borough](#)

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The findings tell us that generally those who own motorcycles are opposed to the introduction of motorcycle parking charges, as expected. However, in order to mitigate the impact on motorcyclists, the emissions-based bandings have been restructured and the prices for the parking charges have been changed. It is hoped that this will mitigate the impact on those who have been used to parking free of charge.

There were instances within the consultation where those who own other vehicles, such as cars, were supportive of the introduction of motorcycle parking charges.

Many motorcyclists do not feel that their motorcycle is safe when parked on-street. Infrastructure to ensure that motorcyclists feel safe to park their vehicle would need to be considered alongside these proposals, particularly where solo motorcycle bays are going to be introduced.

What the findings do not tell us

The findings do not accurately tell us how commuters would be affected by the proposals, as it was unclear within the findings whether those who stated that they use their motorcycle to commute do so within Lewisham or to other boroughs. Next time, the questions would need to be clearer, in order to gain a more accurate answer.

They also do not accurately tell us whether the protected characteristic groups 'age' and 'disability' will be affected, other than how we have predicted above. This will be kept under constant review.

5. Impact summary

Affected groups and impact of the proposals

Age – neutral

As this is a service change, and motorcyclists would now need to pay for parking, this would need to be made clear to users. As long as clear communication, through a variety of channels, takes place, this would remain a neutral effect on the protected characteristic group of 'age'.

Motorists will need to purchase motorcycle permits through the Council's online parking permit system. Therefore, any members of the public who need assistance doing this online will need to be made aware of the Customer Service phone number that they can use, where an officer will assist in purchasing their permit.

Disability – neutral

Those within this protected characteristic group would continue to park their motorcycle free of charge. Those who hold a Disabled Badge would be eligible for a Disabled Resident Permit, which would allow them to park for free within Resident Permit Holder bays.

They would also be able to park within Council car parks free of charge using their Disabled Badge, as they do now. In on-street short stay parking bays, they would also be able to park free of charge using their Disabled Badge.

Income – positive & negative

Those on a lower income would now need to pay for their parking which ultimately would be a negative income on this protected characteristic group, as their parking was free of charge previously.

However, in order to mitigate this effect, the prices for permits have been drastically reduced. It is hoped that although motorcyclists will now need to pay for their parking, the new proposed lower prices will be more affordable for those on lower incomes.

It is thought that some individuals on lower incomes live within the busiest areas of the borough, and with the introduction of emissions-based permits for all vehicles, it is thought that this would have a positive effect on health.

Language spoken – negative

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There is the potential for the proposals to have a negative impact on those who speak English as a second language if the changes are not communicated appropriately. In order to mitigate the impact on this protected characteristic group, clear communication will need to take place.

6. Mitigation

In order to mitigate the impact on several protected characteristic groups, as well as those groups identified above, the following actions will be taken.

Protected characteristic groups

Age

Clear communication will take place to inform the public of the upcoming changes.

The public will be made aware of the several different channels that they can use to obtain a permit, including both online and via telephone, should they need assistance.

Disability

Motorcycle Resident Disabled Permits will be available for those who hold a Disabled Badge and own a motorcycle. Paid for parking will still be free of charge for Disabled Badge holders although they will still need to park within a motorcycle bay off-street and park perpendicular to the kerb on-street. Motorcycle Carer Permits would also be available.

However, residents can only obtain either a Resident Disabled **or** Carer Permit, in line with Council policy.

Income

Having consulted with motorcycle lobbyist groups, it was made clear that Business Permit prices in particular were too high, and that there should be a daily or weekly business pass for those who commute into the borough, or delivery drivers, who ride around the borough, picking up and delivering food.

In order to mitigate the impact on those motorcyclists who may receive payments per job or are on lower incomes, a daily business pass for £2.00-£5.00 (depending on the emissions of the motorcycle) have been proposed. The weekly business pass would be £6.00-£9.00 (depending on the emissions of the motorcycle). It is hoped that this would be more affordable for these groups and would allow them to continue delivering across the borough. As mentioned, these passes would allow motorcyclists to park in eligible bays across the borough.

Language Spoken

Clear communication of the changes would need to take place.

7. Service user journey that this decision or project impacts

Service users, particularly motorcyclists who would be expected to purchase a permit, can email lewishamparkingpermits@nslservices.co.uk for assistance in purchasing a permit. They may also submit any queries to this email address, and a Customer Service Officer will respond to them.

As well as this, motorcyclists would be able to call 020 8787 5397 and press option 3, where a Customer Service Officer would be able to assist them with purchasing their permit by telephone.

The relevant pages on the Council website will be updated, including the "[Motorcycle Parking](#)" page. We will also add dedicated FAQs pages for motorcyclists, should there be a need for this.

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Information regarding these changes would need to be communicated to the parking enforcement contractor, and training would need to be provided to ensure that all staff are aware of the intended changes, if they are agreed upon.

This includes the on-street team, the Customer Service Officers (both for PCNs and permits), and the parking complaints team.