

## Derbyshire Dales District Council Equality Impact Assessment

*Brief guidance notes shown in italics*

<b>Title of policy, practice, service or function being assessed</b>	Review of Car Parking Policy
<b>Officers conducting assessment</b>	Steve Capes Keith Postlethwaite Giles Dann Sarah Newton
<b>Date of assessment</b>	May 2013 / reviewed in September 2013
<b>Reason for assessment</b>	Change of policy
<b>Equalities Lead Officer</b>	Giles Dann

### **Purpose, aims and objectives of the policy, practice, service or function under impact assessment**

The District Council's current car parking policy was last reviewed in 2003. Although periodic reviews have been made to the Car Parking Order since, principally in respect of parking charges, there has been no fundamental review of the policy since then.

The review objective is to: *Review the Council's current Car Parking Policy having regard to the financial impact of policies on the local economy and the Council's overall financial position, and to develop recommendations for inclusion in a new Car Parking Policy to be introduced in Autumn 2013* (note timescale since extended to January 2014 to allow further meetings with representatives of the trading community, visit car parks proposed to be brought into charge and consider the significant response to the public consultation).

The review includes the structure and level of charges across the District Council's 33 Pay & Display car parks, concessions, provision and information, but not enforcement or car parks owned by others.

Feedback from the Derbyshire Dales Citizens' Panel, Area Community Forums and stakeholder focus groups helped shape a series of proposals for public consultation, held during the summer. Drawing on the consultation findings, the following changes to the current car parking policy are recommended to the Council's Environment Committee ahead of consideration by full Council:

**R1a)** That the car parks on Market Place and Shawcroft Ashbourne, Former Lido and Olde English Road Matlock, Market Place and Granby Road Bakewell and Market Place Wirksworth be designated as short-stay car parks

**R1b)** That a flat rate charge of £1 be introduced for evening / overnight parking from 6.00pm to 8.00am on all District Council off-street car parks

**R1c)** That a new car parking pricing structure be approved as follows: up to 1 hour £1.30; up to 2 hours £2.20; up to 3 hours £3.30; up to 4 hours £4.40 and all day £5.50. Coach parking would be £5.00 for 3 hours

**R1d)** That an annual charge of £60 is introduced for second / replacement resident parking permits

**R2** That, subject to appropriate works being undertaken to address equalities issues and a report being presented to a future meeting, the principle of charges being introduced for Blue Badge

holders with an additional 1 hour free parking on top of any paid time, be approved

**R3** That no charge be introduced at the Agricultural Business Centre, Bakewell for Livestock Market Passes and that discussions take place with Bagshaws to take on responsibility for administering the parking pass scheme and thus delivering a net saving to the Council

**R4** That no charges be introduced for car parking at Cockayne Avenue Ashbourne, Market Place Cromford, Edgefold Road Matlock and Canterbury Road Wirksworth pending a future review of car parking

**R5** That at such time as it is possible to provide an equivalent number of B Zone permit bays on-street within the Controlled Parking Zone, consideration be given to introducing pay and display charging on the Pig Market car park, Bakewell

**R6** That the District Council develop a machine replacement programme based upon pay on entry (Pay and Display) which offers the potential for customers to pay either by cash, debit /credit card, pre-pay smart card or phone

**R7** That the capital resources required for the implementation of a machine replacement programme and annual maintenance contract be funded through car parking income sources or through the Council's Capital Programme

**R8** That officers undertake a fundamental review of all signage to off-street car parks in light of concerns raised by the trading community and others, and that provision is made for improvements to signage as part of the Council's Capital Programme.

This EIA considers the equality implications of the recommendations, drawing on the consultation findings as appropriate.

#### **Are there any other organisations involved in its implementation?**

- DDDC Parking Partnership with Joint Authorities in Rural Derbyshire
- Contractors – APCOA (Parking Enforcement Contract – although not covered by this review) & Kings (Cash Collection Contract)

#### **Main customer groups (beneficiaries) / stakeholders**

##### **Customer Groups:**

- Local residents
- Businesses and Local Traders
- Visitors
- Public Agencies in Dales
- Those working in Dales
- Blue Badge Holders
- Coach Operators

##### **Other stakeholders:**

- DCC
- PDNPA
- Chamber of Commerce
- Police
- Derby & Derbyshire Road Safety Partnership
- Visit Peak District
- DCIL and other disability groups
- Town & Parish Councils
- Motoring Bodies

#### **Which other District Council departments are affected by the policy, practice, service or function? Do any of the objectives directly support or hinder another activity?**

Estates/Property Services – Asset valuations, fabric repair and maintenance

Customer Services – Public enquiries and complaints

Tourism – destination parking and visitor enquiries, coach parking provision

Community Safety Partnership – Secure by design and Parkmark

Leisure Services – parking for centre users, recreation ground users and visitors to parks

Officers do not feel that the proposals will hinder the activity of other services.

<b>Assessing relevance to the public sector Equality Duty</b>	
<p>The general Equality Duty has three aims which require the District Council to have due regard to the need to:</p> <ul style="list-style-type: none"> <li>• eliminate unlawful discrimination (both direct or indirect), harassment and victimisation;</li> <li>• advance equality of opportunity between all persons i.e. removing or minimising disadvantages suffered by protected groups; taking steps to meet the needs of people from protected groups where these are different from the needs of other people and encouraging people from protected groups to participate in public life or other activities where participation is disproportionately low;</li> <li>• foster good relations between all persons i.e. tackling prejudice and promoting understanding between people from different groups.</li> </ul> <p>Which aims of the Equality Duty is the policy, practice, service or function relevant to?</p>	<p><i>Please state</i></p> <p>Eliminating discrimination and advancing equality of opportunity are particularly relevant</p>

**What evidence is already available or needed to help establish the impact of the policy, practice, service or function on protected groups? (Include consideration of relevant data and research available locally and nationally; monitoring information; performance information; previous consultation and engagement e.g. residents' surveys, satisfaction surveys, focus groups; access to services data; complements and complaints; previous equality assessments. When considering gaps, think about any additional monitoring arrangements needed and the need for further consultation).**

<b>Information / Data</b>	<b>When and how collected</b>	<b>Source</b>	<b>What it tells you</b>	<b>Gaps</b>
<p>Community engagement events to shape proposals and public consultation results on proposed policy changes (to help assess impact of proposals)</p>	<p>Various dates between November 2012 and June 2013 via Citizens' Panel, Area Community Forums, Focus Groups (including with disability groups), on-line and paper survey (1,442 responses received), letters to key stakeholders, direct mail to sample of Dales Blue Badge holders (500), Face to face surveys of visitors in TICs and most used District Council car parks and mail drop in vicinity of car parks proposed to be brought into charge.</p>	<p>DDDC</p>	<p>Majority of comments (with equalities implications) raised regarding proposed introduction of charging for Blue Badge holders (with an hour free on top of any paid time). 31% of all respondents felt the proposal was unreasonable. Blue Badge holders are split on the issue – 45% feel it is reasonable / 44% unreasonable to charge.</p> <p>Issues raised include: the policy would result in displacement of Blue Badge holders parking on the road (12 respondents), people with mobility difficulties will find it difficult to walk to and from pay machines and feel under pressure to get back to their car to avoid a ticket (9 respondents) and concerns that those on low / fixed incomes (including people affected by welfare reforms and unable to work) would not be able to pay, which may affect their ability to get out and about (7 respondents). The point was also made that some disabled people, particularly with severe disabilities, have no option but to use their own transport and will therefore have to pay.</p>	<p>Despite wide publicity, a lower proportion of younger people responded to the consultation. Whilst, based on the proposals, this does not prevent completion of the EIA, consideration should be given to ways to increase interest in future surveys.</p>

			<p>Regarding the proposal to allow an extra hour on top of paid time (allowing extra parking time for people who are less mobile), most of those commenting felt the first hour (rather than additional hour) should be free then charges applied (11 respondents). A small number felt an additional hour may not be long enough (2 respondents).</p> <p>Regarding the proposed increase in charges overall, a small number (2 respondents) commented on the lack of public transport in rural areas resulting in residents being reliant on their cars and having to pay more to park.</p> <p>Regarding proposals to bring additional car parks into charge, several residents (across groups) raised concerns regarding lack of alternatives to park close to their homes and identified the need for residents' permits.</p> <p>Regarding machine replacement / allowing payment by credit card and phone, Blue Badge holders were less supportive (48% agreed compared with 64% of residents) which may relate to comments regarding the potential introduction of charging and access to machines.</p>	
Parking Data from neighbouring authorities and areas with similar visitor profiles	Compiled from published website data and personal calls	Local Authorities	<p>Comparable charging policies.</p> <p>We know of a recent challenge/case arising from introducing charges for Blue Badge Holders – however, in this case additional time was not given to allow for mobility difficulties (unlike DDDC proposal which allows 1 hour additional on top of any paid time to allow for mobility difficulties)</p>	
Complaints	No complaints relating to equalities issues in last 3 years	Admin Records	N/A	
Derbyshire Dales Equalities profile (available National and local data)	2011 Census data on age and gender	ONS	<p>Proportion of 65+ well above national average (22.3% versus 16.3% England) and is forecast to increase further. Lower proportion of younger people aged 16-24 (8.7%) compared to national position (11.9%).</p> <p>There remains a slightly higher proportion of resident females than males (similar regionally and nationally).</p>	

	2010	Annual Population Survey, ONS	<p>Higher proportion of people who's day to day activities are limited (18.5% compared to 17.6% nationally) and a higher proportion providing unpaid care (12.7% versus 10.2% nationally)</p> <p>Proportion of White British residents well above national averages (96.8% versus 79.8%). A further 1.8% are from other white backgrounds.</p> <p>Higher proportion of residents with Christian beliefs (68.7% versus 64.1% nationally).</p> <p>24.4% of the working age population were disabled or had a work limiting disability which is above the national average (20.1%)</p> <p>The Dales equalities profile indicates that older people and people with disabilities remain priority groups.</p>	
Unemployment figures /	August 2013	ONS compiled by DCC	Unemployment remains lowest in Derbyshire (1.2%). At 2.1% the unemployment rate for under 25 year olds is also below the national average.	N/A
Index of Multiple Deprivation	2010	DCLG	In terms of overall deprivation, the majority of the Dales falls within the 50% least deprived nationally. Matlock Hurst Farm (Lower Super Output Area) within Matlock St Giles ward is within the 20% most deprived areas nationally.	

Protected Groups	Positive effects	Negative effects	No effect	Don't know	Improvement actions
<p>Does the policy, practice, service or function have a positive or negative impact on people of a particular <b>age</b> such as children, young people, older people?</p>	<p><b>R1a)</b> and <b>R5</b> will benefit older people requiring a central location to park and access local services. May also benefit older motorists with impaired mobility, where greater turnover of parking spaces closer to town centres increases likelihood of availability. The option of up to a 4hr stay will remain available in one short stay car park in each town centre.</p> <p>Public conveniences accessible from proposed short stay car parks</p> <p>Long stay car parks will also remain available in or close to each town centre.</p> <p><b>R1b)</b> may be beneficial to both young people and those of a pensionable age who are non-resident and who make use of leisure facilities in the evenings.</p> <p><b>R1d)</b> provides flexibility in households with more than 1 car which may be beneficial to new young drivers living at home</p>	<p><b>R1c)</b> increase in charges applies to all. However, resident's parking permit allowing free parking before 11am and after 4pm will remain and benefit all residents</p> <p><b>R1d)</b> would require obtaining a permit by application, which may disadvantage a minority in the older age group if solely available online</p>	<p><b>R2-8</b> No differential impact anticipated</p>		<p><b>R1d)</b> Accessible methods required for submitting applications for second or replacement residents parking permit</p>
<p>Does the policy, practice, service or function have a positive or negative impact on <b>people with disabilities</b> including people with physical disabilities, sensory impairments, limiting long-term illnesses, learning disabilities or mental health difficulties?</p>	<p><b>R1a)</b> and <b>R5</b> will benefit people with disabilities requiring a central location to park and access local services. May also benefit Blue Badge holders and motorists with impaired mobility, where greater turnover of parking spaces closer to town centres increases likelihood of availability.</p> <p>The option of up to a 4hr stay will remain available in one short stay car park in each town centre.</p> <p>Public conveniences accessible from proposed short stay car parks.</p> <p>Long stay car parks will also remain</p>	<p><b>R1a)</b> Designation of short stay car parks potentially places restriction on time for disabled people</p> <p><b>R1c)</b> and <b>R2</b> would no longer provide the benefit of free parking to Blue Badge holders and may provide difficulties, in the case of certain disabilities, in obtaining tickets from machines. The policy may also have implications for</p>	<p><b>R3, R4, R7</b> No differential impact anticipated</p> <p><b>R8</b> Any proposed signage is required to comply with DfT guidance</p>		<p><b>R1a)</b> Time allowed in short stay car parks will need to be extended by 1 hour for Blue Badge holders</p> <p><b>R1c)</b> <b>R2, R6 and R8</b> would require that equalities issues are addressed before implementation.</p> <p>New Pay &amp; Display machines and alternative methods of payment need to take account of a wide</p>

Protected Groups	Positive effects	Negative effects	No effect	Don't know	Improvement actions
	<p>available in or close to each town centre.</p> <p><b>R1b)</b> may be beneficial to Blue Badge holders and motorists with impaired mobility, who are non-resident and who make use of leisure facilities in the evenings.</p> <p><b>R2</b> Additional hour on top of paid parking time for Blue Badge holders recognises the need for extra time for people who are less mobile (treating disabled people more favourably). Blue Badge holders will continue to be able to park in both disabled and non-disabled spaces</p> <p><b>R6</b> The provision of alternative methods of payment e.g. phone will benefit those with disabilities and impairments. Cash option also to be retained</p>	<p>the level of disabled bay provision</p> <p>However, resident's parking permit allowing free parking before 11am and after 4pm will remain and benefit all residents</p> <p><b>R6</b> Location of machines may not be accessible in all car parks (note replacement programme proposed not rationalisation)</p> <p><b>R1d)</b> would require obtaining a permit by application, which may disadvantage some, dependent upon the method of applying</p>			<p>range of disabilities and impairments. This should include instructions for use, location in relation to disabled bays and accessibility of machines</p> <p>Consider option of providing pre-paid vouchers to avoid need for Blue Badge holders to visit P&amp;D machines</p> <p>Ensure signage at entrance of car parks makes clear Blue Badge Holders will be charged and that relevant conditions are adequately displayed</p> <p>Review provision of marked disabled bays in line with national guidance for Blue Badge holders and those with VED exemptions</p> <p><b>R1d)</b> Accessible methods required for submitting applications for second or replacement residents parking permit</p>
<p>Does the policy, practice, service or function have a positive or negative impact on any <b>racial / minority ethnic groups</b>?</p>	<p><b>R1d)</b> provides flexibility in larger households with more than 1 car, providing low cost parking to second family member at prescribed times</p>		<p><b>R1a)</b> and <b>R2-8</b> No differential impact anticipated</p>		

Protected Groups	Positive effects	Negative effects	No effect	Don't know	Improvement actions
Does the policy, practice, service or function have a positive or negative impact on <b>women or men</b> including those living in particular communities?	<p><b>R1a)</b> and <b>R5</b> will benefit women or men with young children requiring a central location to park and access local services.</p> <p><b>R1d)</b> potential benefits for those reliant on two vehicles e.g. people with children</p>	<p><b>R1c)</b> increase in charges applies to all. However, resident's parking permit allowing free parking before 11am and after 4pm will remain and benefit all residents</p> <p><b>R2</b> Introduction of Blue Badge charging may impact on men or women with adult dependants or disabled children</p>	<p><b>R1b)</b> <b>R2-4, R6-8</b> No differential impact anticipated</p>		<p><b>R2</b> would require that equalities issues are addressed before implementation (esp. placement of P&amp;D machines)</p>
Does the policy, practice, service or function have a positive or negative impact on <b>pregnant women or people on maternity or paternity leave?</b> Please also consider any impacts on <b>breastfeeding mothers.</b>	<p><b>R1a)</b> and <b>R5</b> will benefit pregnant women requiring a central location to park and access local services. Greater turnover of parking spaces closer to town centres will also increase likelihood of availability.</p> <p><b>R1d)</b> provides flexibility in households with more than 1 car, providing low cost parking to second family member at prescribed times</p>	<p><b>R1c)</b> increase in charges applies to all. However, resident's parking permit allowing free parking before 11am and after 4pm will remain and benefit all residents</p>	<p><b>R1b)</b> <b>R2-4, R6-8</b> No differential impact anticipated</p>		
Does the policy, practice, service or function have a positive or negative impact because of a person's <b>marital status including civil partnership?</b>	<p><b>R1d)</b> provides flexibility in households with more than 1 car, providing low cost parking to second family member at prescribed times, and irrespective of marital status</p>		<p><b>R1a)-b)</b> and <b>R2-8</b> No differential impact anticipated</p>		
Does the policy, practice, service or function have a positive or negative			<p><b>R1-8</b> No differential impact</p>		

Protected Groups	Positive effects	Negative effects	No effect	Don't know	Improvement actions
impact on people with a particular <b>sexual orientation</b> ?			anticipated		
Does the policy, practice, service or function have a positive or negative impact on people with particular <b>religion or belief</b> ?			<b>R1-8</b> No differential impact anticipated		
Does the policy, practice, service or function have a positive or negative impact on <b>trans people or people planning to or going through gender reassignment</b> ?			<b>R1-8</b> No differential impact anticipated		
Does the policy, practice, service or function have a positive or negative impact on <b>access for people in rural areas</b> ?	<p><b>R1b)</b> will benefit people living in villages neighbouring the Dales who are non-resident and who make use of leisure facilities and other market town services in the evenings.</p> <p><b>R1d)</b> provides flexibility in households with more than 1 car, which will benefit vehicle dependent families in rural areas within the district boundary.</p> <p><b>R3</b> will benefit the farming communities both within and outside the Derbyshire Dales, by providing free parking for Livestock vehicles attending sales</p> <p><b>R8</b> will benefit those visiting the market towns who are unfamiliar with off street</p>	<b>R1c)</b> and <b>R2</b> People living in rural communities in non-DDDC settlements, close to our market towns will have to pay more to park	<b>R1a)</b> and <b>R4-7</b> No differential impact anticipated		

Protected Groups	Positive effects	Negative effects	No effect	Don't know	Improvement actions
	parking provision.				
Does the policy, practice, service or function have a positive or negative impact on <b>other groups e.g. those experiencing deprivation or health inequalities?</b>	<p><b>R1b)</b> may benefit people living in rural communities when making use of leisure facilities and other market town services in the evenings and those on lower incomes</p> <p><b>R1d)</b> provides flexibility in households with more than 1 car, providing low cost parking to second family member at prescribed times</p> <p><b>R4</b> will benefit households on low income, by retaining limited number of free car parks</p>	<b>R1c)</b> and <b>R2</b> People living in rural communities in non-DDDC settlements, close to our market towns will have to pay more to park	<b>R1a)</b> <b>R3</b> and <b>R5-8</b> No differential impact anticipated		

<b><i>Outsourced services</i></b>	
If your policy, practice, service or function is partly or wholly provided by external organisations/agencies, please list any arrangements to ensure that they promote equality and diversity (Include this in your improvement plan)	<p><i>Are council policies built into contractual or service agreements?</i></p> <p>N/A</p>
<b><i>Relations between different protected groups</i></b>	
Does your assessment show that a policy, practice , service or function may amount to potential adverse impact between different protected groups? If yes please explain how the improvement plan is going to tackle this issue	<p><i>Any adverse differential impacts should be addressed</i></p> <p><b>R2</b> recognises the need to deal with inequalities issues prior to the introduction of charges. Alternative and convenient methods of payment also to be provided</p>

***If an existing policy, practice, service or function, has it achieved its intended outcomes for the customer groups / stakeholders identified? If not, are there any equalities issues for protected groups?***

*N.B. If nothing additional to answers to key questions move on.*

N/A

***If a new policy, practice, service or function, what factors could effect its intended outcomes from being achieved and are there any equalities issues for protected groups?***

*N.B. If nothing additional to answers to key questions move on.*

**R6** and **R7** recognise the need for capital investment in new pay and display machines, the absence of which would delay the implementation of **R2**.

***Can you think of any intentional or unintentional factors that could contribute to negative or differential impact?***

*N.B. If nothing additional to answers to key questions move on.*

N/A

**Summarise the key issues resulting from this equality impact assessment and any measures identified to minimise or remove any adverse impact and promote equality of opportunity?**

<p><b>Key Issues:</b></p> <ul style="list-style-type: none"> <li>• Providing a second / replacement permit would require obtaining a permit by application, which may disadvantage a minority in the older age group if solely available online</li> <li>• Designation of short stay car parks potentially places restriction on time for disabled people</li> <li>• Charging Blue Badge holders / increase in charges would no longer provide the benefit of free parking to Blue Badge holders and may provide difficulties, in the case of certain disabilities, in obtaining tickets from machines. The location of machines may not be accessible in all car parks (note replacement programme proposed not rationalisation) and appropriate signage will be required. The policy may also have implications for the level of disabled bay provision</li> <li>• Introduction of Blue Badge charging may impact on men or women with adult dependants or disabled children</li> </ul>	<p><b>Actions:</b></p> <ul style="list-style-type: none"> <li>• Accessible methods required for submitting applications for second or replacement residents parking permit</li> <li>• Time allowed in short stay car parks will need to be extended by 1 hour for Blue Badge holders</li> <li>• Requires that equalities issues are addressed before implementation, including:             <ul style="list-style-type: none"> <li>- new Pay &amp; Display machines and alternative methods of payment need to take account of a wide range of disabilities and impairments. This should include instructions for use, location in relation to disabled bays and accessibility of machines</li> <li>- consider option of providing pre-paid vouchers to avoid need for Blue Badge holders to visit P&amp;D machines</li> <li>- review provision of marked disabled bays in line with national guidance for Blue Badge holders and those with VED exemptions</li> <li>- ensure signage at entrance of car parks makes clear Blue Badge holders will be charged and that relevant conditions are adequately displayed</li> </ul> </li> <li>Further discussion should also take place with advisory bodies like Derbyshire Dales Disability Access Group to inform and review the policy</li> <li>• See actions above</li> </ul>
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**From the information gathered above, does the policy, practice, service or function discriminate (either directly or indirectly) against any protected groups? Explain why?**

The main equalities impacts from the proposals appear to be on people with disabilities. The recommendation to allow an additional hour on top of any paid parking time for Blue Badge holders recognises the need for extra time for people who are less mobile, therefore treating disabled people more favourably in line with the Equality Act. Blue Badge holders will continue to be able to park in both disabled and non-disabled spaces and the proposal is subject to appropriate works being undertaken to address equalities issues (see proposed actions). On this basis, and with the other mitigating actions proposed, the proposals are not considered discriminatory.

**Do you think this policy, practice, service or function should proceed to full EIA? Explain why**

*The full EIA process includes a stakeholder day to gain views on any key issues and the preparation of an action plan to address them.*

Not at this stage. A detailed EIA has been completed drawing on the results of an extensive public consultation exercise, including with disability groups and Blue Badge holders. It is not considered that a further stakeholder day will add to the information already available and appropriate mitigating actions have been identified subject to Members' decision. The EIA will be reviewed should any future changes be proposed (beyond those currently identified).

**PLEASE FORWARD THE COMPLETED FORM TO THE DISTRICT COUNCIL'S LEAD EQUALITIES OFFICER**

Signed \_\_\_\_\_ (Completing Officer) Signed \_\_\_\_\_ (Equalities Lead Officer)