

Equality Impact Assessment (EIA) Tool

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Document Control

Control Details:	
Title of EIA/ Decision (DDM):	Ref 24: Introduce a Residents Parking and Permit Charging Scheme
Budget booklet code (if applicable):	
If this is a budget EIA please ensure the title and budget booklet code is the same as the title used within the budget booklet	
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1	Cathy Scales	27/10/2022

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Glossary of Terms

Term	Description
DWP	Department for Work and Pensions
DLA	Disability Living Allowance
PIP	Personal Independence Payment
NCC	Nottingham City Council
TMP	Traffic Management Permanent
TRO	Traffic Regulation Order

Section 1 – Equality Impact (NCC staff/ Service users/ Citizen/ Community impact)

1. a. Brief description of proposal/ policy/ service to be assessed

Since the initial introduction of Resident Permit Parking Schemes, tens of thousands of permits have been issued which have improved neighbourhoods and enabled communities to manage parking on their streets. There is a significant cost in the administration and management of the permits that has been subsidised by the Council, meaning that all residents, whether they are part of a scheme or not, have been contributing to the cost of the schemes. Currently the majority of parking permits are free to resident with the exception of businesses and students.

On 29th July 2022 through to 16th September a public consultation (Traffic Management Permanent TMP) – 7410) was launched seeking approval in to make a Traffic Regulation Order (TRO), which would enable the introduction of charges for second and third resident and visitor parking permits. It was proposed that the first Resident or Resident Visitor permit assigned to each property will be free, the second permit £35 (less than 75p per week) and the third permit £50 per year (less than 95p per week) (3 permits in total per household). These annual charges would be required to enable the Council to recoup the ongoing costs of operating residents parking schemes. The levels of charging have been determined to discourage multiple car ownership/user rates any negative impacts will be mitigated by increasing availability of parking spaces across the residential schemes as well as contributing towards reductions in carbon emissions.

The positive impact of this proposal is a possible reduction in private vehicles owned by residents which could result in improved access to residents parking schemes throughout the city.

There are currently 46,000 residential and visitor parking permits in circulation within the schemes which equates to approximately 15,000 households, the current policy offers three permits per household.

As part of the consultation process the Council sought the views of the following:

- Councillors
- Nottinghamshire Police (and other formal bodies)
- Public (Eligible Properties)
- Highway users

The first phase was to distribute the consultation letters to all Councillor's which was sent on 6th July 2022. Phase two of the consultation contacted formal consultees such as Nottinghamshire Police the following week on 11th July 2022.

The findings from the consultation were analysed ahead of the decision-making process. All objections were sent directly to Traffic Management. Feedback requested from residents regarding existing permit areas including suggestions where residential parking schemes were no longer require were sent to Community Protection.

1. b. Information used to analyse the equalities implications

Consultation Responses

As part of the Consultation 32,776 letters were posted to eligible residential properties, notices were advertised in the Metro and 2500 notices were installed on streets with permit parking bays. Traffic Management received 1087 objections to the proposal from this engagement which have been categorised into five general themes as follows:

1) Cost – 531 mention the permit cost and/or the impact on finances during a cost of living crisis

The Council considers the price of the new permits to be reasonable and fair and in some cases inexpensive in comparison to the other benchmarked Council's. The benchmarked Council's and others charge for the first permit, in addition to other permits. This proposal confirms the first permit will remain free to all households and the charges apply to additional permits only.

2) Principle – 366 Objected in principle to charges being applied

3) Equality – 319 mention an equality issue. These include Disabilities, the Elderly, Healthcare needs, Social Isolation, Low Income Households, Smaller properties with no off-street parking

The Equality issues raised have been carefully considered and as above the first permit per household will remain free. Mitigations have been put in place for Blue Badge Holders and family/friend Carers. The amount of available permits remains the same. The majority of the benchmarked local authorities offer a maximum of two permits per household. The Elderly are not considered to be impacted by this proposal as there is no direct correlation between age groups and vehicles owned.

4) Requirement/Enforcement – 241 responses include a reference to the need for restrictions or the fact they do not believe enforcement is adequate (mainly related to schools and the drop off/pick up periods).

5) Renewal Timing – 4 Objections relate to the timing/proposed renewal process

A total of 66 residents contacted Traffic Management with general comments/questions and 9 residents sent correspondence in support of the proposals.

The objections also include several petitions as follows: 624 signatures (Meadows Area), 178 signatories (Noel Street Area Hyson green), 75 signatories (Birkin Area of Hyson Green), 43 signatories (Salford Gardens Area of St Anns, 12 signatories (Morley Avenue Mapperley), 10 signatures (Penn Avenue Area of Lenton).

The correspondence received by Community Protection has been recorded centrally separate to the data obtained by Traffic Management for consideration.

The feedback received by Community Protection found that there were few indifferent or positive comments about the proposal.

The most common concerns centred on unnecessary/removal of schemes, cost of living/ financial position of the City Council, the potential social impacts as well as concerns for residents with regular carers/disabilities. Finally, ineffective enforcement.

- Unnecessary/Ineffective or Removal of Scheme – There have been 428 responses received by Community Protection related to the parking schemes/restrictions either being unnecessary due to various factors which are represented within the other common reoccurring themes or comments related to the effectiveness of existing schemes. This is largely due to there being no noticeable differences to on street parking resulting in residents directly requesting a scheme to be removed.
- Cost of Living/Tax/Financial Position of the City Council - 110 responses related to the cost of living and Nottingham City’s council tax rates. Comments largely concerned the fiscal impact this could have on families in the current financial climate whilst associating the proposal to the increase in council tax. There has also been commentary on the economic position of the city council.
- Social Impacts – Residents voiced their apprehensions to ‘pay’ to see family and friends and the impacts of likely isolation and loneliness particularly following Covid Lockdowns. There were 65 comments which raised concerns of how the parking permits impact family events, visiting elderly family who require support due to the maximum number of permits allotted per household.
- Regular Carers/Disability Concerns - The service has received 47 comments with concerns on the likely impacts this proposal may have to people with disabilities or who have regular medical carers.
- Ineffective Enforcement – There were 43 comments which stated enforcement activity on existing restrictions wasn’t adequate or inconsistent.
- Other Comments Received - Separate of the common themes there have been a smaller number of comparable requests or comments. These include but aren’t limited too:
 - I. The removal of the Parking Levy in areas within the city to avoid unwanted parking on residential streets
 - II. Consideration made for two free permits and the charge being applied to the third permit requested
 - III. Existing schemes to match or be altered to reflect schemes in place on streets locally

This detailed insight has been presented to both Portfolio Holder's ahead of a final decision to proceed at Executive Board.

On the basis of the aforementioned objections a permit parking scheme and best practice a benchmarking process was carried out with other core cities and Local Authorities such as Nottingham County Council, Derby City Council, Leicester City Council and Sheffield City Council.

Our findings confirmed that residents from all equality groups will continue to be able to access residential parking schemes with every household within a residential scheme being offered their first household permit free of charge. None of the other Local Authorities which were benchmarked offered the first permit for free. Furthermore, the Council recognises that transport and parking is particularly important to disabled people and Carers; therefore, considerations were put forward for the proposal to contain exemptions for residential Blue Badge Holders and Carers.

The benchmarking exercise identified what type of exemptions local authorities such as these have in place for Disabled Blue Badge holders and family/friend Carers when applying for residential or visitor permits.

The following criteria has been identified by utilising the benchmarked Council's information to determine Nottingham City Council's eligibility criteria for Blue Badge and Carer exemption permits.

Blue Badge Holder

The blue badge holder must reside at the address and provide proof of a copy of the blue badge (You do not need to provide this if the badge was issued by Nottingham City Council, we will check our own data base)

The blue badge holder permit holder can only park in their own residential scheme

Additional proofs

Proof of residency - Council Tax Bill, utility bill etc. (dated within the last 3 months) and a Certificate of Motor Insurance

Proof of requiring regular Carer attendance in the form of a letter (must show residents name and address) from the Department of Work and Pensions (DWP) confirming that the resident receives one of the following

- The resident receives Attendance Allowance
- Receives the care element of Disability Living Allowance (DLA) – middle or higher rate

- Receives Personal Independent Payment (PIP) – daily living allowance

In addition, the resident will also require a letter from the Department of Work and Pensions (DWP) confirming that the resident’s family/friend is in receipt of Carers Allowance (letter must show residents name and address).

Additional proofs

Proof of residency - Council Tax Bill, utility bill etc. (dated within the last 3 months) and a Certificate of Motor Insurance (if applicable).

There is already a policy in place where Public/Private sector commissioned Healthcare Providers can purchase an annual Residential Dispensation Permit. There will be no change to this policy as part of this proposal.

1. c. Who will be affected and how?

Impact type (NCC staff/ Service users/ Citizens/ Community)	Equality group/ individual	Positive	Negative	None	Reasons for your assessment (Including evidence)	Details of mitigation/ actions taken to advance equality	Details of any arrangements for future monitoring of equality impact (Including any action plans)
	People from different ethnic groups	X	X	X	No specific impact – First permit is free and charging for second and third		

					permits do not impact disproportionately on any race.		
	Men			X	No specific impact – First permit is free and charging for second and third permits do not impact disproportionately on any gender.		
	Women			X	No specific impact – First permit is free and charging for second and third permits do not impact disproportionately on any gender.		
	Trans			X	No specific impact – First permit is free and charging for second and third permits do not impact disproportionately on any gender.		

	Disabled people/ carers		X		The Council recognises that transport and parking is particularly important for disabled people and carers and therefore the proposal contains concessions for disabled people and carers.	<p><u>Residential Blue Badge Holders</u></p> <p>One free resident/visitor permit (as with all households) – Proofs apply</p> <p>Up to two free blue badge holder’s exemption permits (up to three free permits in total)</p> <p>The blue badge holder must reside at the address and provide proof of a copy of the blue badge (You do not need to provide this if the badge was issued by Nottingham City Council, we will check our own data base)</p> <p>The blue badge holder permit holder can only park in their own residential scheme</p>	

						<p>Additional proofs</p> <p>Proof of residency - Council Tax Bill, utility bill etc. (dated within the last 3 months) and a Certificate of Motor Insurance</p> <p><u>Family/friend Carer</u></p> <p>One free resident/visitor permit (as with all households) – Proofs apply</p> <p>Up to two free Carer exemption permits (up to three free permits in total)</p> <p>The resident would need proof of requiring regular Carer attendance in the form of an individual letter (which must show the residents name and address) from</p>	
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						<p>the Department of Work and Pensions (DWP) confirming that the resident receives one of the following:</p> <ul style="list-style-type: none"> • The resident receives Attendance Allowance • The resident receives the Care element of the Disability Living Allowance (DLA) – Middle or Higher rate • The resident receives Personal Independent Payment (PIP) – Daily Living Allowance <p>In addition, the resident will also require a letter from the Department of Works and Pensions (DWP)</p>	
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						<p>confirming the resident's individual family/friend is in receipt of Carers Allowance (the letter must show the residents name and address).</p> <p>Additional proofs</p> <p>Proof of residency - Council Tax Bill, utility bill etc. (dated within the last 3 months) and a Certificate of Motor Insurance if applicable</p> <p>If the resident requires a second Carer's exemption permit the resident must provide the same proofs as above for the second individual Carer.</p>	
	Pregnancy and maternity			X	Private and Public Sector Health Care providers		

					are available for purchase.		
	Marriage/Civil Partnership			X	No specific impact – First permit is free and charging for second and third permits do not impact disproportionately on any Marriage or Civil Partnership.		
	People of different faiths/ beliefs and those with none			X	No specific impact – First permit is free and charging for second and third permits do not impact disproportionately on people of different faiths/beliefs and those with none.		
	Lesbian/ Gay/ Bisexual people			X	No specific impact – First permit is free and		

					charging for second and third permits do not impact disproportionately on any Lesbian/Gay or Bisexual people.		
	Older			X	No specific impact – First permit is free and charging for second and third permits do not impact disproportionately on older people (please see disabled people/carers).		
	Younger			X	No specific impact – First permit is free and charging for second and third permits do not impact disproportionately		

					on younger people.		
	<p>Other (e.g. looked after children, cohesion/ good relations, vulnerable children/ adults), socio-economic background.</p> <p><i>Please underline the group(s) /issue more adversely affected or which benefits.</i></p>			X	<p>No specific impact – First permit is free and charging for second and third permits do not impact disproportionately on any other groups.</p>		

1. d. Summary of any other potential impact (including cumulative impact/ human rights implications):

The Council has a statutory duty to promote the interest of people with disabilities and Carers and therefore the Council recognises the importance of providing help and support to those with protected characteristics particular those residents with specific accessibility requirements. Although potential negative impacts have been identified in this proposal these are balanced by the positive impacts associated with alleviating localised parking problems such as discouraging multiple car ownership, increasing availability of parking spaces and reducing carbon emissions. The other objections have been carefully considered but the Council's aim is legitimate and justifiable. Moreover, introducing further exemptions to those already proposed for disabled residents and residents Carers would undermine the Council's ability to recoup ongoing administrative costs which could jeopardise the scheme's effective functioning.

There is no direct discrimination towards any protected characteristics. Furthermore, parking policies need to be progressed to manage parking in Nottingham's residential parking schemes. In doing so the Council is exercising its powers conferred under the Road Traffic Regulation Act 1984, which is to secure the expeditious, convenient and safe movement of vehicles and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway. The Council must also have regard to its network management duty under the Traffic Management Act 2004 – that is a duty to manage the road network so as to secure, so far as may be reasonably practicable the expeditious movement of traffic.

Section 2 – Equality outcome

Please include summary of the actions identified to reduce disproportionate negative impact, advance equality of opportunity and foster good relations. Please pull out all of the mitigations you have identified and summarise them in this action plan

Equality Outcome	Adjustments to proposal and/or mitigating SMART actions	Lead Officer	Date for Review/ Completion	Update/ complete
Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act 2010.				
Advance equality of opportunity between those who share a protected characteristic and those who don't				
Foster good relations between those who share a protected characteristic and those who don't	<p>The options featured in the proposal eliminate discrimination, advance equality of opportunity and/or fosters good relations with protected groups.</p> <p>If the proposals are implemented they will be monitored at six monthly intervals.</p> <p>If any equality impacts arise through the monitoring process this Equality Impact Assessment will be updated to reflect the</p>	Cathy Scales	<p>Assessment to be reviewed in 12 months.</p> <p>Data to be captured for Blue Badge Holders and family/friend Carers who</p>	

	<p>impacts and migrations will be introduced to reduce such impacts.</p> <p>Any changes will also be communicated to residents though the Councils Web site and public notices.</p>		<p>reside in residential parking schemes for any other proposals of a similar nature in the Council. We have robust systems in place to keep track of complaints, comments and enquires.</p>	
<p>(Please add other equality outcomes as required – e.g. mitigate adverse impact identified for people with a disability)</p>				

Please note: All actions will need to be uploaded onto Pentana

Section 3 – Approval and publishing

<p>The assessment must be approved by the manager responsible for the service /proposal. Approving Manager details (name, role, contact details):</p> <p>James Douglas – Head Of Operations james.douglas@nottinghamcity.gov.uk</p> <p>Central Police Station</p>	<p>Date sent for advice: 27/10/2022</p>
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Byron House Maid Marian Way Nottingham NG1 6HS	
Approving Manager Signature: 	Date of final approval: 08/11/2022

For further information and guidance, please visit the [Equality Impact Assessment Intranet Pages](#)
Alternatively, you can contact the Equality and Employability Team by telephone on 0115 876 2747

Send document or link for advice and/ or publishing to: edi@nottinghamcity.gov.uk

PLEASE NOTE: FINAL VERSION MUST BE SENT TO EQUALITIES OTHERWISE RECORDS WILL REMAIN INCOMPLETE.