

City of York Council
Equalities Impact Assessment

Who is submitting the proposal?

Directorate:	Place		
Service Area:	Parking Services		
Name of the proposal:	Graham Titchener		
Lead officer:	Graham Titchener		
Date assessment completed:	30/08/2023		
Names of those who contributed to the assessment :			
Name	Job title	Organisation	Area of expertise
Graham Titchener	Parking Services Manager	City of York Council	Transport and Highways

Step 1 – Aims and intended outcomes

1.1	<p>What is the purpose of the proposal? Please explain your proposal in Plain English avoiding acronyms and jargon.</p>
	<p>This proposal is to assess any impacts on the public in line with the Equality Act for the implementation the following items that are being put forward for a decision by the Executive Member for Economy and Transport. The following will be referred to in the rest of this assessment by their bullet point number:-</p> <ol style="list-style-type: none"> 1. Review and decrease of the emission level criteria for discount permits. 2. Increasing the access and use of daily property permits 3. Reduction in the time a vehicle is allowed to park with an annual parking waiver <p>The Exec Member decision report covers these points where this EIA is to help assess the impacts of these decisions, where it is considered item 1 will have the most negative impact for those who current enjoy the discount associated with their permit but if their vehicle emission is above the new agreed level, they will need to pay the full 50% increase for their permit. For those on limited means this may well have a significant financial impact for them where they may not have the means to buy a lower emission vehicle.</p>

1.2	Are there any external considerations? (Legislation/government directive/codes of practice etc.)
	New DVLA guidance updating the old vehicle emission bands to emission ratings that the Executive Member Decision report refers to and informs the options around the emission levels for item 1. The York Traffic Regulation Order will need to be changed.

1.3	Who are the stakeholders and what are their interests?
	<p>All motor vehicle users and York residents who can access York parking permits that have an emission-based discount, daily property permits and those who are granted an annual parking waiver.</p> <p>Their interests pertain to if they currently received a discount on their parking permit and if this will continue given the emission level of their vehicle meeting the new emission level.</p> <p>For those with an annual parking waiver this decision will impact on the length of time they can park for using this waiver, however given the reasons for granting this waiver the suggested time of limiting the parking permitted to 2 hours should suffice based on the requests for these permits, such as window cleaners and property maintenance (security). This will allow enough time to either undertake the required work or asses the required work and make the area safe.</p> <p>Increasing of access to the daily property permits to residents/property owners and allowing these to be used in occupied as well as unoccupied properties is seen as a positive and in response to many requests from property owners. In addition in response to trades people and property owners to allow for the number of these permits to be used per property per day from 1 to 3 is also in recognition that property repair and renovation will sometimes require more than 1 vehicle to be parked but balance against the need to protect the parking capacity for other permit holders.</p>

1.4	What results/outcomes do we want to achieve and for whom?
	To record the possible impacts of these decisions and bring them to light to support and help inform the decisions requested in the main report.

Step 2 – Gathering the information and feedback

2.1	What sources of data, evidence and consultation feedback do we have to help us understand the impact of the proposal on equality rights and human rights? Please consider a range of sources, including: consultation exercises, surveys, feedback from staff, stakeholders, participants, research reports, the views of equality groups, as well your own experience of working in this area etc.	
Source of data/supporting evidence	Reason for using	
<p>These decisions and options are informed by the need to update our parking permit emission based policies that are based on old UK Government vehicle bands.</p> <p>The Council Civil Enforcement Officers reported seeing an increase in vehicles parking with an annual parking waiver on display for extended periods of time, without any movement to/from the vehicle. This gave an indication that the vehicles</p>	<p>To update York's outdated policy for vehicle emission bands, contribute to the reduction in vehicle emissions and support an increase in revenue for the council.</p> <p>This waiver was originally proposed for window cleaners, that had water tankers on their vehicles and security companies to ensure that they could park as close as possible when required. The operations were not expected to be long term and should only require short term parking whilst operations were undertaken in the vicinity.</p>	

<p>were not required for the works, as all the tools/machinery were unloaded for the works to commence.</p> <p>A number of requests from trades people and property owners and in consultation with Parking Services enforcement officers.</p>	<p>To positively respond to these requests to increase the access and use of daily property permits.</p>
<p>Decisions 1 and 3 will need to go through a Traffic Regulation Order consultation, which will be brought back to the Exec Member and will help inform this EIA. Decision 2 is a policy amendment.</p>	

Step 3 – Gaps in data and knowledge

3.1	What are the main gaps in information and understanding of the impact of your proposal? Please indicate how any gaps will be dealt with.		
Gaps in data or knowledge		Action to deal with this	
Permit holders views who currently receive a discount of the parking permit.		The TRO consultation process will allow for those who currently have a permit that has a discount element to it, to be informed of this TRO consultation process and whose views will be complied and added to a later report to the Exec Member to decide on the TRO changes based on this consultation process.	

Step 4 – Analysing the impacts or effects.

4.1	Please consider what the evidence tells you about the likely impact (positive or negative) on people sharing a protected characteristic, i.e. how significant could the impacts be if we did not make any adjustments? Remember the duty is also positive – so please identify where the proposal offers opportunities to promote equality and/or foster good relations.		
Equality Groups and Human Rights.	Key Findings/Impacts	Positive (+) Negative (-) Neutral (0)	High (H) Medium (M) Low (L)

Age		+ & -	M
	<p>Those who currently benefit from a discount but depending on the decision as to which emission band is agreed and whose vehicle would fall outside of that new level will have to pay the standard permit price.</p> <p>Those who currently enjoy the no time limit to park with a parking waiver will not be limited to the amount of time they can park for and where their business may require them to park for longer than 2 hours, would be impacted on. Conversely this will help increase the parking capacity for other users such as blue badge holders, other users of the city parking waiver and those legality entitled to park in restricted areas for loading and unloading.</p> <p>The increase in use and availability of the daily property permit will be positively impacted but conversely if 2 or more properties in the same zone have up to 3 trades vehicles per property will impact on the parking capacity of that street and zone.</p> <p>Those who fall into the older age categories who currently benefit from the discounted parking permits but who may fall outside of the new emission limit will need to pay the standard permit price. For those on a tight budget or smaller pension this may not be affordable for them and buying a lower emission vehicle may also not be affordable or an option for them. While this will need to go out through the TRO consultation process, which will help inform this decision, the Executive Member may deem further consultation is required for those in these age groups, e.g. engagement with the York Older People's Assembly.</p> <p>For those in these older age categories who currently have the annual parking waiver may find the 2 hour limit not long enough to do their work.</p>		

	As this is a policy decision, there would not need to be a TRO consultation, so the decision to consult on this would be one for the Executive Member to decide upon.		
Disability	<p>Those who currently benefit from a discount but depending on the decision as to which emission level is agreed and whose vehicle would fall outside of that new level, will have to pay the standard permit price.</p> <p>Those who currently enjoy the no time limit to park with a parking waiver will not be limited to the amount of time they can park for and where their business may require them to park for longer than 2 hours, would be impacted on. Conversely this will help increase the parking capacity for other users such as blue badge holders, other users of the city parking waiver and those legality entitled to park in restricted areas for loading and unloading.</p> <p>The increase in use and availability of the daily property permit will be positively impacted but conversely if 2 or more properties in the same zone have up to 3 trades vehicles per property will impact on the parking capacity of that street and zone.</p> <p>On the whole this is consider positive for blue badge holders who can park for free in restricted areas but also help increase parking capacity where currently those with the city parking waiver may be taking up space for any blue badge holders.</p> <p>However it is understood that not all disabled people have a blue badge. As a result those without a blue badge who currently benefit from the discounted parking permits but who may fall outside of the new emission limit will need to pay the standard permit price. For those on a tight</p>	+	M

	<p>budget this may not be affordable for them and buying a lower emission vehicle may also not be affordable or an option for them. While this will need to go out through the TRO consultation process, which will help inform this decision, the Executive Member may deem further consultation is required with disabled people, e.g. engagement with the York Access Forum.</p> <p>For disabled people who don't have a blue badge and who currently have the annual parking waiver, may find the 2 hour limit not long enough to do their work, dependant on their impairment. As this is a policy decision, there would not need to be a TRO consultation, so the decision to consult on this would be one for the Executive Member to decide upon.</p> <p>Due to some of the issues caused by those with this waiver parking in areas that are used by Blue Badge holders, such as Duncombe Place, this should help to reduce the impact on capacity by these permit holders parking in this and other areas used by Blue Badge holders.</p>		
Gender	<p>Those who current benefit from a discount but depending on the decision as to which emission band is agreed and whose vehicle would fall outside of that new level will have to pay the standard permit price.</p> <p>Those who currently enjoy the no time limit to park with a parking waiver will not be limited to the amount of time they can park for and where their business may require them to park for longer than 2 hours, would be impacted on. Conversely this will help increase the parking capacity for other users such as blue badge holders, other users of the city parking waiver and those legality entitled to park in restricted areas for loading and unloading.</p>	+ & -	M

	The increase in use and availability of the daily property permit will be positively impacted but conversely if 2 or more properties in the same zone have up to 3 trades vehicles per property will impact on the parking capacity of that street and zone.		
Gender Reassignment	<p>Those who current benefit from a discount but depending on the decision as to which emission band is agreed and whose vehicle would fall outside of that new level will have to pay the standard permit price.</p> <p>Those who currently enjoy the no time limit to park with a parking waiver will not be limited to the amount of time they can park for and where their business may require them to park for longer than 2 hours, would be impacted on. Conversely this will help increase the parking capacity for other users such as blue badge holders, other users of the city parking waiver and those legality entitled to park in restricted areas for loading and unloading.</p> <p>The increase in use and availability of the daily property permit will be positively impacted but conversely if 2 or more properties in the same zone have up to 3 trades vehicles per property will impact on the parking capacity of that street and zone.</p>	+ & -	M
Marriage and civil partnership	<p>Those who current benefit from a discount but depending on the decision as to which emission band is agreed and whose vehicle would fall outside of that new level will have to pay the standard permit price.</p> <p>Those who currently enjoy the no time limit to park with a parking waiver will not be limited to the amount of time they can park for and where their business may require them to park for longer than 2 hours, would be impacted on. Conversely this will help increase the parking capacity for other users such as blue badge holders, other users of the city parking</p>	+ & -	M

	<p>waiver and those legality entitled to park in restricted areas for loading and unloading.</p> <p>The increase in use and availability of the daily property permit will be positively impacted but conversely if 2 or more properties in the same zone have up to 3 trades vehicles per property will impact on the parking capacity of that street and zone.</p>		
Pregnancy and maternity	<p>Those who current benefit from a discount but depending on the decision as to which emission band is agreed and whose vehicle would fall outside of that new level will have to pay the standard permit price.</p> <p>Those who currently enjoy the no time limit to park with a parking waiver will not be limited to the amount of time they can park for and where their business may require them to park for longer than 2 hours, would be impacted on. Conversely this will help increase the parking capacity for other users such as blue badge holders, other users of the city parking waiver and those legality entitled to park in restricted areas for loading and unloading.</p> <p>The increase in use and availability of the daily property permit will be positively impacted but conversely if 2 or more properties in the same zone have up to 3 trades vehicles per property will impact on the parking capacity of that street and zone.</p>	+ & -	M
Race	It is deemed this will not impact of any issues connected to Race.	0	L
Religion and belief	This shouldn't have any impact on this group other than the impacts on parking capacity that may restrict church goers who go to the churches on or nearby Duncombe Place, impacted on by those with an annual parking waiver.	0	L

Sexual orientation	It is deemed this will not impact of any issues connected to sexual orientation.	0	L
Other Socio-economic groups including:	Could other socio-economic groups be affected e.g. carers, ex-offenders, low incomes?		
Carer	<p>Those who current benefit from a discount but depending on the decision as to which emission band is agreed and whose vehicle would fall outside of that new level will have to pay the standard permit price.</p> <p>Those who currently enjoy the no time limit to park with a parking waiver will not be limited to the amount of time they can park for and where their business may require them to park for longer than 2 hours, would be impacted on. Conversely this will help increase the parking capacity for other users such as blue badge holders, other users of the city parking waiver and those legality entitled to park in restricted areas for loading and unloading.</p> <p>The increase in use and availability of the daily property permit will be positively impacted but conversely if 2 or more properties in the same zone have up to 3 trades vehicles per property will impact on the parking capacity of that street and zone.</p> <p>As the attendance permit used by carers is free it is deemed this will not have an impact on carers unless they do not qualify for one of these and would have another permit that would be impacted on these decisions.</p> <p>Capacity of parking may be positively and negatively impacted on as with other permit holders such as those in a resident parking zone.</p>	+ & -	M

Low income groups	<p>Those who current benefit from a discount but depending on the decision as to which emission band is agreed and whose vehicle would fall outside of that new level will have to pay the standard permit price.</p> <p>Those who currently enjoy the no time limit to park with a parking waiver will not be limited to the amount of time they can park for and where their business may require them to park for longer than 2 hours, would be impacted on. Conversely this will help increase the parking capacity for other users such as blue badge holders, other users of the city parking waiver and those legality entitled to park in restricted areas for loading and unloading.</p> <p>The increase in use and availability of the daily property permit will be positively impacted but conversely if 2 or more properties in the same zone have up to 3 trades vehicles per property will impact on the parking capacity of that street and zone.</p> <p>This is considered High due to those who currently enjoy the 50% discount but for those who will fall outside of the new emission level will need to pay the standard amount that is a 50% increase in costs that may be unaffordable for those of low incomes and who may not be able to afford a lower emission vehicle.</p>	-	H	
Veterans, Armed Forces Community	It is deemed this will not impact of any issues connected to armed forces but to state that this would impact on the users of these permits.	0	L	
Other				

Impact on human rights:			
List any human rights impacted.	As a result of accepting a lower emission level, those who currently receive the permit discount where their vehicle may not meet the new emission level, will see a 50% increase in their permit price as they move to the standard emission level. This may mean that this is unaffordable for them, denying their use of getting around and parking by private vehicle. For those who are able there are alternative means to get around but for those with impairments their blue badge will negate these issues given they can park for free in any car park, resident parking one and on-street pay and display bays. However for those with impairments who do not qualify for a blue badge where alternative forms of transport may not be an option for them and in addition on a low income, may mean this would impact on those in that situation and disadvantaged as a result.	-	M

Use the following guidance to inform your responses:

Indicate:

- Where you think that the proposal could have a POSITIVE impact on any of the equality groups like promoting equality and equal opportunities or improving relations within equality groups
- Where you think that the proposal could have a NEGATIVE impact on any of the equality groups, i.e. it could disadvantage them
- Where you think that this proposal has a NEUTRAL effect on any of the equality groups listed below i.e. it has no effect currently on equality groups.

It is important to remember that a proposal may be highly relevant to one aspect of equality and not relevant to another.

<p>High impact (The proposal or process is very equality relevant)</p>	<p>There is significant potential for or evidence of adverse impact The proposal is institution wide or public facing The proposal has consequences for or affects significant numbers of people The proposal has the potential to make a significant contribution to promoting equality and the exercise of human rights.</p>
<p>Medium impact (The proposal or process is somewhat equality relevant)</p>	<p>There is some evidence to suggest potential for or evidence of adverse impact The proposal is institution wide or across services, but mainly internal The proposal has consequences for or affects some people The proposal has the potential to contribute to promoting equality and the exercise of human rights</p>
<p>Low impact (The proposal or process might be equality relevant)</p>	<p>There is little evidence to suggest that the proposal could result in adverse impact The proposal operates in a limited way The proposal has consequences for or affects few people The proposal may have the potential to contribute to promoting equality and the exercise of human rights</p>

Step 5 - Mitigating adverse impacts and maximising positive impacts

5.1	Based on your findings, explain ways you plan to mitigate any unlawful prohibited conduct or unwanted adverse impact. Where positive impacts have been identified, what is been done to optimise opportunities to advance equality or foster good relations?
<p>The TRO consultation process, supported by targeted communications to those impacted on this will help to better understand the impacts of the decisions to review the emission level that are considered to have a negative impact of some of these users.</p> <p>These findings will then be taken to a follow up report to the Exec Member to decide on these changes in the TRO.</p>	

Step 6 – Recommendations and conclusions of the assessment

6.1	<p>Having considered the potential or actual impacts you should be in a position to make an informed judgement on what should be done. In all cases, document your reasoning that justifies your decision. There are four main options you can take:</p>
<p>- No major change to the proposal – the EIA demonstrates the proposal is robust. There is no potential for unlawful discrimination or adverse impact and you have taken all opportunities to advance equality and foster good relations, subject to continuing monitor and review.</p>	
<p>- Adjust the proposal – the EIA identifies potential problems or missed opportunities. This involves taking steps to remove any barriers, to better advance quality or to foster good relations.</p> <p>- Continue with the proposal (despite the potential for adverse impact) – you should clearly set out the justifications for doing this and how you believe the decision is compatible with our obligations under the duty</p> <p>- Stop and remove the proposal – if there are adverse effects that are not justified and cannot be mitigated, you should consider stopping the proposal altogether. If a proposal leads to unlawful discrimination, it should be removed or changed.</p>	
<p>Important: If there are any adverse impacts you cannot mitigate, please provide a compelling reason in the justification column.</p>	
Option selected	Conclusions/justification

Continue with the proposal	In support of the following this is considered to continue with this proposal however to highlight the possible impacts and advise that the TRO consultation process will help to inform this EIA and the TRO decision making process.
-----------------------------------	--

Step 7 – Summary of agreed actions resulting from the assessment

7.1	What action, by whom, will be undertaken as a result of the impact assessment.		
Impact/issue	Action to be taken	Person responsible	Timescale
Comments from the TRO consultation process to inform this EIA/	Comments will be reviewed by officers and summarised in an Exec Member decision report to agree the TRO.	Graham Titchener & Network Management	EIA to be updated when the TRO process is followed and feedback to the Exec Member.

Step 8 - Monitor, review and improve

8. 1	How will the impact of your proposal be monitored and improved upon going forward? Consider how will you identify the impact of activities on protected characteristics and other marginalised groups going forward? How will any learning and enhancements be capitalised on and embedded?
	Once the decision is made to agree or change the TRO process, this will then become policy. The TRO consultation process will inform the decision making process and balance comments up against the reasoning to take these decisions forward.