Stage 1 Screening Data

1. What are the objectives and expected outcomes of your proposal? Why is it needed? Make sure you highlight any proposed changes.

The proposal to introduce a new charging structure for daily visitor parking permits is aimed at enabling the Council to better control demand for kerbside parking space within Controlled Parking Zones in Brent.

The rationale for the increase in visitor parking charges is:

1) that there is evidence of excessively high levels of demand for parking in certain parts of Brent, especially in those Controlled Parking Zones which are close to neighbouring boroughs;

2) that there is evidence of commuter parking, which is likely due to the current low price of the annual visitor parking permit;

3) to better align Brent’s charging structure with those of neighbouring boroughs;

4) to encourage take up of more sustainable modes of transport by pricing the daily visitor parking product to at least match the cost of a return bus journey; and

5) to improve air quality in Brent and reduce carbon emissions.

The proposed changes are;

1) to increase the cost of the annual Visitor Household permit from £110 in 2015 to £163 in 2016/17. The £163 charge is the same as the highest cost resident permit for vehicles in the proposed Standard emissions band. At this level, the cost of the Visitor Household permit better aligns with the cost of resident permits. This would also ensure a consistent approach is taken with the new price structure for individual visitor permits, seeking to manage the demand for parking spaces by visitors. In order to avoid the risk of disproportionately affecting those CPZ residents who receive care or support visits, the increase in price of Visitor Household permits would be proportionately significantly less than the increase in price of daily visitor permits.

2) to introduce a new pricing structure for the Daily Visitor Parking charges with a proposal to retain the current £1.50 charge for visitor parking permits of up to 2 hours duration. This would freeze the cost for short term visitors at the current rate, with the aim of encouraging a reduction in the amount of time vehicles are parked on-street; introduce a new 4 hour
visitors permit priced at £3.00 and for any stays of more than 4 hours duration, increase the price of the permit to a single payment of £4.50 for an all-day permit. The price of visitor parking is markedly cheaper in Brent compared to neighbouring boroughs and an increase in the tariff would help control levels of demand.

2. Who is affected by the proposal? Consider residents, staff and external stakeholders.

The following key stakeholders are affected by the changes made:

Residents of Brent who live in a CPZ area and who receive visitors who travel by car, and people who visit residents living in CPZs.

The GLA has estimated that the London Borough of Brent's population in 2015 was 321,000. Controlled Parking Zones cover 49% of Brent's residential addresses. This therefore equates to approximately 56,000 households and 157,000 residents in CPZs potentially affected by the changes to the new visitor parking structure and associated price increase, together with their visitors.

3.1 Could the proposal impact on people in different ways because of their equality characteristics?

The proposal to increase visitor parking charges may affect those residents who live in CPZs and receive visitors who provide them with informal care or support, and may therefore receive more visits than other households. This may particularly affect elderly residents, or those with disabilities.

3.2 Could the proposal have a disproportionate impact on some equality groups? If you answered 'Yes' please indicate which equality characteristic(s) are impacted

The proposal to increase visitor parking charges may affect those residents who live in CPZs and receive visitors who provide them informal care or support, and may therefore receive more visits than other households. This may particularly affect elderly residents, or those with disabilities.

3.3 Would the proposal change or remove services used by vulnerable groups of people?

The proposal to increase visitor parking charges does not change or remove the service provision of visitor parking.

3.4 Does the proposal relate to an area with known inequalities?

Approximately half of the borough is affected; no specific geographic areas within Brent's Controlled Parking Zones have been identified as having known equalities issues with regard to age and disability.
3.5 Is the proposal likely to be sensitive or important for some people because of their equality characteristics?

The proposal to increase visitor parking charges may affect those residents who live in CPZs and receive visitors who provide them with care or support, and may therefore receive more visits than other households. This may particularly affect elderly residents, or those with disabilities.

3.6 Does the proposal relate to one of Brent’s equality objectives?

The proposal does not specifically relate to any of the Equality objectives in the Council’s Equality Strategy 2015-19.

4. Use the comments box below to give brief details of what further information you will need to complete a Full Equality Analysis. What information will give you a full picture of how well the proposal will work for different groups of people? How will you gather this information? Consider engagement initiatives, research and equality monitoring data.

Research and engagement activities carried out are provided in Section 7.

________________________________________________________________________

Stage 2: Analysis

5. What effects could your policy have on different equality groups and on cohesion and good relations?

5.1 Age (select all that apply)

☑ Positive
☑ Neutral
☑ Negative

Please give details:

The proposal to increase visitor parking charges may affect those residents who live in CPZs and receive visitors who provide them with informal care or support. This may particularly affect elderly residents.

Residents requiring formal care for *critical* or *substantial* needs can have their formal carers’ parking needs met through the council’s Essential User Permit scheme. This is provided to public and voluntary sector staff who provide care to residents in CPZs. Nonetheless, many residents with critical or substantial needs do also receive informal care and support, often from friends or family members who would not qualify for an Essential User Permit. In addition, all residents with moderate, low, or unknown care needs are entirely dependent on informal care and support.

Many residents therefore use their Visitor Household permit to ensure that people providing them with care or support can park when making a visit. In order to avoid the risk of
disproportionately affecting those CPZ residents who receive care. The 50% increase in price of Visitor Household permits would be considerably less than the 100% and 200% increase applied to daily visitor permits for stays of over 2 hours. The Visitor Household permit would continue to provide excellent value to residents receiving at least one regular visitor per week on average.

In addition, if the increased charge to visitors for long stay parking succeeds in controlling demand for spaces, visitors providing care and support to elderly residents would find it easier to secure a parking space.

5.2 Disability (select all that apply)

☑️ Positive
☑️ Neutral
☑️ Negative

Please give details:

The proposal to increase visitor parking charges may affect those residents who live in CPZs and receive visitors who provide them with informal care. This may particularly affect residents with disabilities.

Residents requiring formal care for critical or substantial needs can have their formal carers’ parking needs met through the council’s Essential User Permit scheme. This is provided to public and voluntary sector staff who provide care to residents in CPZs. Nonetheless, many residents with critical or substantial needs do also receive informal care and support, often from friends or family members who would not qualify for an Essential User Permit. In addition, all residents with moderate, low, or unknown care needs are entirely dependent on informal care and support.

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In addition, if the increased charge to visitors for long stay parking succeeds in controlling demand for spaces, visitors providing care and support to disabled residents would find it easier to secure a parking space.

5.3 Gender Identity and Expression (select all that apply)

☐ Positive
☑️ Neutral
☐ Negative

Please give details:

No impact identified
5.4 Marriage and Civil Partnership (select all that apply)

☐ Positive
☑ Neutral
☐ Negative

Please give details: No impact identified

5.5 Pregnancy and Maternity (select all that apply)

☐ Positive
☑ Neutral
☐ Negative

Please give details: No impact identified

5.6 Race (select all that apply)

☐ Positive
☑ Neutral
☐ Negative

Please give details: No impact identified

5.7 Religion or belief (select all that apply)

☐ Positive
☑ Neutral
☐ Negative

Please give details: No impact identified

5.8 Sex (select all that apply)

☐ Positive
☑ Neutral
☐ Negative

Please give details: No impact identified
5.9 Sexual orientation *(select all that apply)*

- [ ] Positive
- [x] Neutral
- [ ] Negative

**Please give details:** No impact identified

5.10 Other *(please specify)* *(select all that apply)*

- [ ] Positive
- [x] Neutral
- [ ] Negative

**Please give details:** No impact identified

6. **Could any of the impacts you have identified be unlawful under the Equality Act 2010? Prohibited acts include direct and indirect discrimination, harassment, victimisation and failure to make a reasonable adjustment.**

- [ ] Yes
- [x] No

7. **Please provide a brief summary of any research or engagement initiatives that have been carried out to formulate your proposal.**

A wide range of methods were employed to consult stakeholders on the proposals and research undertaken which informed the visitor parking charges proposals. These included:

- Benchmarking cost comparison with public transport fares
- Benchmarking cost comparison with other London local authorities
- Analysis of booked visitor parking sessions data
- Analysis of the policy objectives of the 2015 Parking Strategy and 2016 Long Term Transport strategy
- Analysis of Census data to ascertain levels of household car ownership in Brent
- Borough wide public consultation with over 3,300 responses received directly from over 25,000 parking account holders invited to participate
- Engagement and support during the informal consultation to better explain the proposals, and invite participation to complete the questionnaire, was provided to members of the Disability & Politics User group at Brent Mencap.
- Focus Group sessions arranged to capture qualitative opinions expressed by participants
- Formal consultation on a Traffic Management Order, under the Road Traffic Regulation Act 1994 was undertaken on the proposed change to the structure of visitor parking permits in Brent, and the associated price increases for stays of more than two hours. 260 responses were received.
What did you find out from consultation or data analysis?

The data analysis shows that the cost of visitor parking charges in Brent is low in comparison to neighbouring London boroughs, including the partner boroughs of Ealing and Hounslow which have a similar demographic; that there is evidence of excessively high levels of demand for parking in certain parts of Brent, including commuter parking; and that a price increase which is better aligned with those of neighbouring boroughs would encourage take up of more sustainable modes of transport and contribute towards reducing carbon emissions and improving air quality in Brent.

Nonetheless it was anticipated that parking account holders would be resistant to proposals to increase the price they are charged for visitor parking permits.

The informal consultation respondents expressed a majority view against increasing the price of visitor permits, although over a quarter did favour the increase (67% opposed; 26% in favour) from the 3,300 responses received. At the focus group discussions, concerns were expressed about the imbalance between the supply of parking spaces in the borough and the current demand amongst residents and visitors. It was felt this should be a priority for the Council to address. Other respondents were not convinced that the proposals would protect the environment or solve identified parking problems. When taken together, the quantitative and qualitative results painted a mixed picture, although the level of opposition to the proposed price changes was less than expected.

The completion of 264 questionnaires during the 28 day statutory consultation represents a much smaller response rate of 1% when compared to the 3,319 respondents (over 13% of parking account holders) who completed the online questionnaire during the first stage consultation. Respondents did not express opposition to the new structure of visitor parking permits. However, 252 respondents were opposed to the associated price increase for stays of longer than 2 hours. A significant number of residents – particularly amongst those receiving care and support - misunderstood the proposal and expressed opposition on the basis of an incorrect assumption that the £4.50 charge would apply to all visits including short care visits. In fact, visits of less than 2 hours duration will remain at £1.50. This issue is further addressed in the Delegated Authority report (paragraph 6.5) and below.

Were the participants in any engagement initiatives representative of the people who will be affected by your proposal?

An analysis of the 264 responses to the formal Traffic Management Order consultation shows that:

- 25% of respondents said they were 65 or older
- 9% of respondents said they had a disability
- 21% of respondents said they provided care or support to others

These proportions were broadly in line with the 3,300 responses received to the informal consultation exercise. It is considered that both surveys do also broadly reflect the pattern of parking account holders in the borough.
How did your findings and the wider evidence base inform the proposal?

Given the views expressed in response to the proposed price increase the proposals have been reviewed, taking account also of the realistic expectation that there would be customer resistance to the proposed price increases. The review did take into account the views and issues expressed during the formal consultation.

The review has confirmed the findings of the earlier data analysis:

- the cost of visitor parking charges in Brent is low in comparison to neighbouring London boroughs, including the partner boroughs of Ealing and Hounslow which have a similar population demographic of car owners
- there is evidence of excessively high levels of demand for visitor parking in certain parts of Brent, including commuter parking employing visitor permits
- a price increase which is better aligned with those of neighbouring boroughs would encourage take up of more sustainable modes of transport and contribute towards reducing carbon emissions and improving air quality in Brent.

The data analysis, consultation exercises and subsequent review have identified a clear and robust rationale for increasing the cost of the annual visitor parking permit to £163 for a full year, £98 for six months and £66 for three months and introducing a new visitor parking charge in all Controlled Parking Zone (CPZ) areas, with a £1.50 charge for up to 2 hours, £3 charge for up to 4 hours, and £4.50 charge for ‘all-day’.

Specifically addressing the potential equalities implications, the use of Essential User Permits and the Visitor Household Permit are essential components in such an approach. In addition the continued availability of short term visitor permits at a charge of £1.50 does need to be explicitly clarified for elderly and disabled residents.

**STAGE 3: ACTION PLANNING**

8. What actions will you take to enhance the potential positive impacts that you have identified?

If the increased charge to visitors for long stay parking succeeds in controlling excess demand for spaces, visitors providing informal care and support to elderly and disabled residents would find it easier to secure a parking space.

9. What actions will you take to remove or reduce the potential negative impacts that you have identified?

The following measures are in place to mitigate the adverse impacts that an increase in the cost of visitor parking will have on residents who live in CPZs and receive visitors who provide them with care.

**Measure 1:** The Council provides an Essential User Permit to charitable and public sector organisations which provide essential formal care and services to people who live or work in Controlled Parking Zones. The eligibility criteria states that “any person who performs a statutory service on behalf of the Council, including social housing management and residential or community care management, or is a health visitor, general practitioner, district or community nurse, midwife, chiropodist, dentist or osteopath employed by the National Health Service, or who provides home visiting on behalf of a religious or non-profit making charitable organisation”. The residents who receive care visits from an Essential User Permit holder will be unaffected by the proposal to increase visitor parking charges.
Measure 2: Residents are currently able to purchase a Visitor Household permit, which allows their visitors to park in any resident or shared use bay, within the resident’s street in the Zone shown on the permit. This permit may be displayed in any vehicle. This product is currently priced at £110, and it is proposed to increase this to £163. The proposed increase (50%) is proportionately less than the increase applied to daily visitor permits (100% for stays of 2 to 4 hours and 200% for stays over 4 hours). At its current price, and even with the proposed increase, it offers a significantly cheaper alternative to daily visitor permits for those residents who receive regular visitors to their property. £163 would be equivalent to 55 four-hour visitor permits costing £3 each; or 109 two hour permits costing £1.50 each. Residents who purchase the Visitor Household permit and receive care visits will be affected to a lesser extent than other residents by any increase in the cost of the Visitor Household permit price; the purchase of this permit by those residents who receive care visits means that they will not be disproportionately affected by the proposal to increase visitor parking charges.

Measure 3: A significant number of respondents to the formal consultation were unclear about the fact that the £1.50 cost of short-term visits of up to 2 hours would not change. Steps will therefore need to be taken to ensure that parking account holders are clear about all of the options available to them, including the continuing availability of visitor permits for stays of up to 2 hours at a cost of £1.50; and the option of purchasing a Visitor Household Permit, covering a full year’s parking for one visitor at a time for £163.

10. Please explain how any remaining negative impacts can be justified?

The Daily Visitor Permits and Visitor Household permit are universally available to all residents who live in a CPZ, therefore there are no remaining negative impacts.