

## APPENDIX 4 - EQUALITIES IMPACT ASSESSMENT

<b>Department:</b> Environment and Neighbourhoods	<b>Person Responsible:</b> Tim Jackson
Service Area: Highway and Transport Delivery	Timescale for Equality Impact Assessment : By 18.07.2011
Date: June 2011	Completion date: 18.07.2011
Name of service/policy/procedure/project etc:  <b>Conversion of Existing Parking Bays to Pay and Display Parking Bays in Preston Road and Bridge Road.</b>	Is the service/policy/procedure/project etc:  New <input checked="" type="checkbox"/> Old <input type="checkbox"/>
Predictive <input checked="" type="checkbox"/>  Retrospective <input type="checkbox"/>	Adverse impact <input type="checkbox"/>  Not found <input checked="" type="checkbox"/>  Found <input type="checkbox"/>  Service/policy/procedure/project etc, amended to stop or reduce adverse impact  Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Is there likely to be a differential impact on any group? Possibly No <input checked="" type="checkbox"/> Yes <input type="checkbox"/>	Please state below:
1. Grounds of race: Ethnicity, nationality or national origin e.g. people of different ethnic backgrounds including Gypsies and Travellers and Refugees/ Asylum Seekers  No <input checked="" type="checkbox"/> Yes <input type="checkbox"/>	2. Grounds of gender: Sex, marital status, transgendered people and people with caring responsibilities  No <input checked="" type="checkbox"/> Yes <input type="checkbox"/>
3. Grounds of disability: Physical or sensory impairment, mental disability or learning disability  No <input checked="" type="checkbox"/> Yes <input type="checkbox"/>	4. Grounds of faith or belief: Religion/faith including people who do not have a religion  Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
1. Grounds of sexual orientation: Lesbian, Gay and bisexual  Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	2. Grounds of age: Older people, children and young People  No <input checked="" type="checkbox"/> Yes <input type="checkbox"/>
Consultation conducted  No <input type="checkbox"/> Yes <input checked="" type="checkbox"/>	
Person responsible for monitoring: Tim Jackson / Hossein Amir-Hosseini	Date results due to be published and where: Highways Committee 27 <sup>th</sup> July 2011

Please note that you must complete this form if you are undertaking a formal Impact Needs/Requirement Assessment. You may also wish to use this form for guidance to undertake an initial assessment, please indicate.

## 1. What is the service/policy/procedure/project etc to be assessed?

### **Conversion of Existing Parking Bays to Pay and Display Parking Bays in Preston Road and Bridge Road – Formal Impact Assessment**

2. Briefly describe the aim of the service/policy etc? What needs or duties is it designed to meet? How does it differ from any existing services/ policies etc in this area

#### **2.1 Summary**

On 23<sup>rd</sup> March 2011 the Committee gave approval to the Head of Transportation to implement pay and display parking controls, at locations where free but controlled parking arrangements currently exist, subject to appropriate consultation arrangements being following and the identification of funding for implementation.

Proposals for the introduction of pay and display parking controls in Preston Road (and adjacent side roads) and Bridge Road (and an adjacent side road) were subsequently developed and have been the subject of consultation.

In deciding whether to implement the proposals proper consideration must be given to the representations, both in summary and in detail, to the original objectives behind the proposals, to the financial and legal implications and to the Equalities Impact Analysis. This EIA has therefore been prepared to assess the impact of the proposals on the needs and requirements of the community and determine whether these affect or discriminate directly or indirectly against people from some racial groups, sexuality, gender, age, faith or belief or disability.

There have been a significant number of objections (including 4 petitions) to the proposals. These are not considered minor or vexatious and need to be properly considered by the Committee before a decision on whether or not to implement the proposals is made.

The report to Highways Committee on 27<sup>th</sup> July 2011 outlines the representations received in relation to the consultation, including the statutory consultation in association with the Traffic Order process.

Having given this proper consideration, the Committee are recommended to approve implementation of the proposals at both locations.

#### **2.2 Recommendations**

The recommendations in the Highways Committee report are as follows;

- (i) That, having given proper consideration of the matters raised by way of objections and representations summarised within the report, and in the context of the policy and other reasons set out in the report and the Equality Analysis, the Committee approves the introduction of schemes of pay and display parking in Preston Road and Bridge Road (and adjacent side roads), as described in this report.
- (ii) That the Committee notes that it is proposed to undertake a review of the operation of the scheme(s) no later than 12 months after their implementation and present the outcomes of that review to the Committee upon completion of that review

## **2.3 Background - General**

On 13<sup>th</sup> December 2010, in a report on fees and charges, the Executive Committee agreed proposals to “review anomalies for charging for on-street parking spaces on Bridge Road (Wembley), Preston Road and on the Park Royal Industrial Estate”.

On 23<sup>rd</sup> March 2011 the Highways Committee considered a report on the standardising of arrangements for short-term (controlled) on-street parking in the context of the earlier Executive Committee decision. That report considered issues relating to free short parking at locations where it is controlled. The Committee were advised that Preston Road and Bridge Road had been identified as areas where pay and display parking could be introduced so as to address those issues as part of an on-going programme. The Committee was advised that roads in Park Royal were fundamentally different from those such as Preston Road and Bridge Road and that a review of arrangements for those roads would be undertaken and reported at a later date.

The Committee delegated approval to the Head of Transportation to implement pay and display parking controls at identified sites subject to appropriate consultation arrangements being followed and the identification of funding for implementation.

The Committee were advised that residents and businesses in the immediate vicinity of the proposals would be notified of the proposals and invited to make representations as part of the statutory consultation associated with the necessary amendments to Traffic Orders. This would be a departure from the usual arrangements for consulting on larger parking control proposals.

Proposals for both Preston Road and Bridge Road were developed. Residents, businesses and statutory consultees were consulted on the proposals during June.

## **2.4 Existing arrangements & background – Bridge Road**

Bridge Road is a classified “A” road outside of a controlled parking zone (CPZ). The section of Bridge Road between Wembley Park station and its’ junction with Forty Lane has the Ark Academy on the western side and a number of businesses (predominantly retail) on the eastern side.

Extensive (yellow line) parking controls exist within the residential (Chalkhill Road) area to the east of Bridge Road. There are no significant parking controls within the residential (Barn Hill) area to the north of Bridge Road.

Bridge Road is within the Wembley Protective Parking Scheme area. There is a bus lane and “at any time” parking restrictions on the western side of Bridge Road. Along the eastern side of Bridge Road there are 3 parking bays within which parking is permitted free of charge Monday to Saturday between 9.30 am and 4.30pm for a maximum of 2 hours. Parking is not permitted during peak hours. There are no restrictions overnight (between 6.30pm and 8am) and on Sundays, except when the Event Day restrictions are in force. There are 2 parking bays in Chalkhill Road close to the junction with Bridge Road where similar restrictions apply. “At any time” double yellow lines are in place between the parking bays in Bridge Road and at junctions. Single yellow lines exist between and opposite the parking bays in Chalkhill Road.

The parking controls have been in place for a number of years. In 2009 residents were consulted on proposals to convert the free parking bays to pay & display bays so as to increase turnover. The majority of respondents to the consultation rejected the proposals and the Committee decided not to implement them.

## **2.5 Existing arrangements & background – Preston Road**

Preston Road is an unclassified road outside of a CPZ and is a local shopping area. The section of Preston Road between Carlton Road East and The Avenue is predominantly fronted by businesses (generally retail) with residential premises

above. There are yellow line controls to the north and south of this section. There are no significant parking controls in the residential areas to the east and west of Preston Road. There is a (Council operated pay and display) public car park off Preston Way on the western side of Preston Road.

Preston Road is within the Wembley Protective Parking Scheme area. Along both side of Preston Road are (11) parking bays within which parking is permitted free of charge for up to 1 hour (subject to no return within 2 hours) from Monday to Saturday between 8am and 6.30pm. Overnight (6.30pm to 8am) and on Sundays there are no controls. There are (9) similar bays in side roads off of Preston Road close to the junction(s) with Preston Road. There are single and double yellow parking controls, crossing zig-zag controls and bus stop controls between the parking bays.

The current arrangements in Preston Road have been in place since an extension of a smaller, central area, of free parking controls was approved by Highways Committee in March 2006. The decision to expand the extent of free parking bays was informed by a parking survey which illustrated that the original bays were well used and motorists generally complied with the one hour requirement whilst the area with no bays had a lower turnover of space with a longer stay duration. When making their decision the Committee were advised that short term free parking bays are resource intensive in terms of enforcement and that enforcement resources would continue to be prioritised within CPZs.

The Preston Road car park is poorly used. For a short period in 2010/11 the charges for the car park were reduced to below the standard charge rates in other car parks. In April this year charges in the car park were changed to be consistent with all Council public car parks.

## **2.6 Proposals**

In March 2011 the Committee were advised that there were issues in relation to free short term parking in areas where parking controls exist:

- (i) They represent an inconsistency since motorists parking in those bays do so free of charge whilst they would be charged at generally similar locations (outside and within CPZs).
- (ii) They could be argued as being contrary to the Council's general policy of encouraging the use of more sustainable transport modes and discouraging non-essential car journeys
- (iii) In that they are resource intensive to properly enforce there is generally a low level of compliance with the one hour maximum stay and hence their purpose is undermined.

Proposals to address these issues by introducing pay and display controls in both Preston Road and Bridge Road and side roads where free short term parking bays exist were developed. If introduced, motorist would have to pay to park in these bays from Monday to Saturday between 8am and 6.30pm in Preston Road and side roads and from Monday to Saturday between 9.30am and 4.30pm in Bridge road and side road.

The maximum stay period in Preston Road would be 2 hours. All other parking controls (yellow lines) and the Event day arrangements would remain unchanged.

## **2.7 Consultation**

Consistent with the arrangements approved by Highways Committee, consultation on the proposals took place in June 2011. Statutory consultation on the necessary Traffic Orders took place in the normal way with the proposals advertised in the local press, London Gazette and sent to statutory consultees. At the same time, all residents and businesses in the immediate vicinity of the roads where controls were proposed to change were notified of the proposals by letter and invited to make representations.

A meeting, organised by the QARA Group of Associations was attended by officers during the consultation period and at the organisers request to support understanding of the proposals.

Approximately 30 representations were received outside, and prior to the start, of the consultation period. In the main these were received in advance and shortly after the Committees decision to approve consultation in March 2011. Those objections have not been captured here although the sense of those objections is covered by others. It is anticipated that those objectors would have repeated their objections in later correspondence or by signing one of the petitions.

## **2.8 Financial Implications**

These are set out in the committee report.

## **2.9 Legal Implications**

The introduction of parking controls, including the introduction of “pay and display” controls, requires the making of a traffic regulation order under the Traffic Regulations Act 1984’ The procedures to be adopted for making the actual Orders and any amendments thereto are set out in the Local Authorities Traffic Orders (Procedure) (England & Wales) Regulations 1996.

The procedures require a period of statutory consultation, which means the authority, must properly consider any comments and objections to the scheme(s). If it fails to do this the implementation of the scheme would be unlawful and it would be impossible to enforce. If the process is not carried out properly the decision could be challenged by way of judicial review with the same result.

Members have authorised the Head of Transportation to commence the statutory process and to consider and reject objections if he thinks they are minor or vexatious. In this instance objections have been received that the Head of Transportation thinks are other than minor or vexatious. Consequently this report has been presented in order that the Committee shall properly consider the objections and decide whether or not to approve the making of the Traffic Orders and implementation of the scheme(s).

## **2.10 Staffing & other implications**

No significant implications

### **3. Are the aims consistent with the council’s Comprehensive Equality Policy?**

These proposals are consistent with the Council’s aim to ensure that the services we provide are relevant to the needs of the community.

The purpose of this policy is to ensure that services are relevant, responsive and sensitive and we are deemed to be fair and equitable by our service users.

### **4. Is there any evidence to suggest that this could affect some groups of people? Is there an adverse impact around race/gender/disability/faith/sexual orientation/health etc? What are the reasons for this adverse impact?**

This equality impact assessment is being undertaken to determine the impact of converting free parking bays to pay and display parking bays the on the eight equality strands namely age; race; disability; gender; faith sexuality, maternity and pregnancy.

Annexe B provides detail on the equality strand analysis.

### **5. Please describe the evidence you have used to make your judgement. What existing data for example (qualitative or quantitative) have you used to form your judgement? Please supply us with the evidence you used to make you judgement separately (by race, gender and disability etc).**

The issues/ impacts identified are based on census data plus site surveys/ conditions to assess risk. Further consideration will be given to the findings of the consultation process in Annexe A.

Please refer to Annexe B for the equality strand analysis and comprehensive detail on the sources used.

6. Are there any unmet needs/requirements that can be identified that affect specific groups? (Please refer to provisions of the Disability Discrimination Act and the regulations on sexual orientation and faith, Age regulations/legislation if applicable)

An analysis of the equality strands is available in Annexe B.

7. Have you consulted externally as part of your assessment? Who have you consulted with? What methods did you use? What have you done with the results i.e. how do you intend to use the information gathered as part of the consultation?

Consistent with the arrangements approved by Highways Committee, consultation on the proposed changes to the parking bay arrangements started on 6<sup>th</sup> June for 25 days.

Statutory consultation on the necessary Traffic Orders took place in the normal way with the proposals advertised in the local press, London Gazette and sent to statutory consultees. At the same time, all residents and businesses in the immediate vicinity of the roads where controls were proposed to change were notified of the proposals by letter and invited to make representations. A meeting, organised by a local group was attended by officers during the consultation period and at the organisers request to support understanding of the proposals.

Approximately 30 representations were received outside, and prior to the start, of the consultation period. In the main these were received in advance and shortly after the Committees decision to approve consultation in March 2011. Those objections have not been captured although the sense of those objections is covered by others.

8. Have you published the results of the consultation, if so where?

The results of the formal consultation are published with the report to the Councils Highways Committee on 27<sup>th</sup> July 2011.

9. Is there a public concern (in the media etc) that this function or policy is being operated in a discriminatory manner?

No, although a small number of responses to the consultation have raised equality impact concerns and these are analysed in this document.

10. If in your judgement, the proposed service/policy etc does have an adverse impact, can that impact be justified? You need to think about whether the proposed service/policy etc will have a positive or negative effect on the promotion of equality of opportunity, if it will help eliminate discrimination in any way, or encourage or hinder community relations.

The proposed changes to change free parking to pay and display parking bays are not judged to be discriminatory or hinder community relations.

11. If the impact cannot be justified, how do you intend to deal with it?

Not applicable.

12. What can be done to improve access to/take up of services?

The introduction of pay and display controls will allow motorists to pay to stay (legally) beyond the current maximum time periods which will allow visitors to park close to facilities which usually require a longer stay time or where there is uncertainty about the stay time. This would support certain trips.

It also leads to more effective enforcement (assuming the level of resources does not change) which in turn improves compliance and increases opportunities to park and "churn". At the current time, spot surveys indicate a generally low level of available parking space at both locations' when the existing controls are operational.

The existence of the car park at Preston Road offers visitors the opportunity to park reasonably close to the shopping area at lower rates than the pay and display charges proposed.

13. What is the justification for taking these measures?

In March 2011 the Committee were advised that there were issues in relation to free short term parking in areas where parking controls exist. The issues were that:

- They (free short term bays) represent an inconsistency since motorists parking in those bays do so free of charge whilst they would be charged at generally similar locations elsewhere (outside and within CPZs).
- They could be argued as being contrary to the Council's general policy of encouraging the use of more sustainable transport modes and discouraging non-essential car journeys
- In that they are resource intensive to properly enforce, there is generally a low level of compliance with the one hour maximum stay and hence their purpose is undermined.

Therefore, the justification is that the introduction of pay and display parking will mitigate the above issues.

14. Please provide us with separate evidence of how you intend to monitor in the future. Please give the name of the person who will be responsible for this on the front page.

The Council will monitor the operation of the new pay and display parking arrangements and officers propose to undertake a review of the scheme(s) no later than 12 months after their implementation and present the outcomes of that review to the Committee upon completion of that review.

Should you

1. Take any immediate action?
2. Develop equality objectives and targets based on the conclusions?
3. Carry out further research?

No further immediate or future action has been identified other than a review of the operation of the scheme(s) no later than 12 months after their implementation the results of which will be presented to committee.

16. If equality objectives and targets need to be developed, please list them here.

Not applicable.

17. What will your resource allocation for action comprise of?

The operational review of the scheme(s) will be undertaken by officers and funded through the existing revenue budget.

If you need more space for any of your answers please continue on a separate sheet

ANNEXE A - RESPONSES TO THE CONSULTATION  
ANNEXE B - EQUALITY STRAND ANALYSIS

Signed by the manager undertaking the assessment:

Full name (in capitals please):

Tim Jackson

Date: 18-07-2011

Service Area and position in the council:

Head of Transportation, Highway and Transport Delivery Service, Environment and Neighbourhoods

Details of others involved in the assessment - auditing team/peer review:

Sandor Fazekas, Asst. Head, Highway and Civil Engineering

## **ANNEXE A – RESPONSES TO THE CONSULTATION**

### **Responses to of the consultation**

#### **Summary**

The proposals have generated a number of objections.

A total of 43 written responses to the proposals have been received. Aside from one response all the responses opposed the proposals. However, the number and size of petitions received indicates a wider interest and resistance to the proposals

Of the responses 35 (85%) related solely to the proposals for Preston, 5 (11%) related to solely to the Bridge road proposals whilst 3 (4%) covered both proposals.

32 (75%) of the responses came from residents with 6 (14%) coming from businesses and 5 (12%) coming from ward members.

4 petitions were received. These have all been verified by Democratic Services. Details of the petitions are shown in the report to Highways Committee. All of the petitions were signed by residents and others opposed to the proposals. A total of 2182 signatures are contained within the 4 petitions.

No objections were received from the statutory consultees (the emergency services etc).

#### **Consideration of objections / representations**

The following section of the report considers the objections / representations received in response to the consultation. Every objection / representation received (as summarised in Appendices 2 and 3) has been considered in the drafting of this report. There are a number of recurring themes in the objections. For practical reasons this section discusses those recurring themes only.

The recurring grounds for objection are:

- The proposals will adversely impact on residents using the local shops, reducing patronage and, in turn, adversely impact on the viability of the businesses/shopping areas (which is contrary to the Council's wider policies and strategies)
- The existing arrangements are working well and there is no justification for change
- The consultation arrangements were flawed
- The proposals will adversely impact on residents living within the area affected by the controls
- The proposals will displace parking onto adjacent residential streets without controls and adversely impact on the amenity of residents there
- The rationale for introducing the proposals is flawed and the objectives will not be achieved
- The financial business case is flawed – in particular the impact on lost business rates has not been considered
- The pay & display charges proposed are exorbitant



- The proposals will adversely impact on older people needing to access services in the 2 areas, rely on use of a car, and have limited disposable income.
- The proposals are (wholly) finance driven

Considering each issue in turn

***“The proposals will adversely impact on residents using the local shops, reducing patronage and, in turn, adversely impact on the viability of the businesses/shopping areas (which is contrary to the Council’s wider policies and strategies)”***

The proposals will clearly impact those residents who currently use or work in the businesses in Preston Road and Bridge Road and currently drive to park there. Those residents will have to decide whether to drive and pay, drive and park nearby or in the car park, visit the area using a different mode of transport or to use facilities/shops elsewhere.

No surveys have been undertaken to measure the origins, purpose or normal duration of visitors to these locations and therefore it is not possible to predict the precise impact of the proposals. It is the case that it is not normal practise to undertake such surveys and no “patronage” surveys were undertaken at either location when the controls at each location were implemented.

In the absence of detailed surveys it is assumed that most users of the businesses at the 2 locations either live within a reasonably close proximity or are “passing through”.

The introduction of pay and display controls will allow motorists to pay to stay (legally) beyond the current maximum time periods which will allow visitors to park close to facilities which usually require a longer stay time or where there is uncertainty about the stay time. This would support certain trips.

Similarly the introduction of pay and display controls leads to more effective enforcement (assuming the level of resources does not change) which in turn improves compliance and increases “churn”. This is likely to increase patronage as potential visitors perceive the areas as easier to find a space to park. At the current time, spot surveys indicate a generally low level of available parking space at both locations’ when the existing controls are operational.

The existence of the car park at Preston Road offers visitors the opportunity to park reasonably close to the shopping area at lower rates than the pay and display charges proposed.

The cost and availability of parking spaces does generally impact on decisions on how, when and where to access facilities. However there are many other drivers that also impact on the viability and vitality of shopping parades (operational costs, the retail mix/offer, proximity of competition, quality of the public realm etc). Officers are of the view that there is no definitive evidence that the proposals will have a significant detrimental impact on patronage which would in turn adversely impact on the viability and vitality of businesses at these locations.

The Council’s wider strategies and policies, including the (draft) Local Implementation Plan which is the subject of a report elsewhere on the agenda and the Council’s current Parking Enforcement Plan are not specific in relation to the form and nature of controls to be employed at any particular location and do not compliment or run contrary to the proposals.

***“The existing arrangements are working well and there is no justification for change”***

There are 3 issues which the proposals are intended to address: The first is that the existing arrangements are inconsistent with other areas. Regardless of how the arrangements are perceived as working, it is evident that the arrangements are inconsistent with that elsewhere (inside and outside CPZs) and hence is a reason for change. The second is that the arrangements could be argued as contrary to the Council’s policy of encouraging the use of more

sustainable transport means. In is the case that the arrangements do discourage long stay commuter parking in both areas. However the existence of free short term parking bays does little to encourage potential visitors to travel to the area by foot or cycle (where it is practicable to do so). The introduction of the proposals would encourage a proportion of visitors to examine alternative travel choices. The third issue is that of compliance with the maximum stay period. It is the case that pay and display controls are less resource intensive to enforce than the existing arrangements. There are indications that compliance could be improved at both locations which would improve “churn” which frequently supports trade. The introduction of a longer maximum stay period encourages visits from compliant motorists seeking to use certain types of facilities.

***“The consultation arrangements were flawed”***

The consultation arrangements were consistent with those agreed by the Highways Committee at the meeting on 23<sup>rd</sup> March 2010. The arrangements comply with legislation in relation to the introduction of parking controls. Those residents and businesses in the immediate vicinity of the proposals were alerted to the proposals by letter drop in addition to the statutory press and street notices. It would not be practicable or necessarily appropriate to directly alert every potential visitor to the two locations of the proposals.

Notwithstanding the arrangements made, the number and source of the responses received indicates a relatively high level of awareness of the proposals and how to respond. Officers are of the view that the consultation arrangements were appropriate and adequate and will have enabled the Committee to consider pertinent and relevant issues and make an informed decision.

***“The proposals will adversely impact on residents living within the area affected by the controls”***

No analysis of car ownership levels of residents within the areas where controls are proposed has been undertaken. Nevertheless it is recognised that the proposals could impact on those vehicle owning residents who live within the two locations and seek to park close to their homes in two main ways.

Firstly, they will have to pay for short term parking whereas they previously would not have had to. This is the case but has to be balanced by the opportunity to pay and park for longer periods and by the increase in opportunities to park that should be result from increased churn.

Secondly, there is the risk that the proposals will displace parking into adjacent residential streets and limit parking choices for those residents who live within the areas where pay and display is to be introduced and seek to park elsewhere (when the controls are in operation). There is no certainty that this will be the case since it will depend on the choices other users/visitors make. Generally residents and visitors seek parking space at different times of the day and this ameliorates the impact of displaced parking although not generally on Saturdays.

***“The proposals will displace parking onto adjacent residential streets without controls and adversely impact on the amenity of residents there”***

Again it is difficult to assess the degree to which parking will be displaced into adjacent areas since it will depend on a number of factors that currently influence visitors/users and the choices they would make if the proposals are introduced.

In the case of Bridge Road displacement this is unlikely to be a significant issue since there are parking controls to the east of Bridge Road and the nearest uncontrolled areas (around Barn Hill) are unlikely to be attractive alternatives.

There are no significant controls in the residential roads adjacent to Preston Road. There is evidence of relatively high levels of commuter parking in roads or parts of roads closest to the station and shopping area at the current

time. However a recent consultation undertaken to ascertain the level of local support to address this through introduction of a CPZ showed a lack of consensus for the introduction of CPZ controls.

Again it is difficult to determine to what extent parking will be displaced. In the main commuter parking in adjacent roads starts before there is greatest demand for parking space to visit shopping areas. There is likely to be a degree of additional displacement which will in turn increase the difficulty that some residents may have parking in close proximity to their homes. This is likely to be ameliorated to a degree by a “spreading” of any displacement over a relatively large area. Where displacement might cause significant local congestion or seriously compromise road safety it will be possible to introduce short lengths of parking controls (i.e. at corners) to address this.

The Committee will be aware that there are currently no resources to re-visit the possibility of introducing a CPZ in this area.

The degree to which the introduction of pay and display controls is seen as acceptable by visitors and encourages churn and to which visitors use the public car park will impact on the extent of any displacement onto adjacent roads and hence on the extent of loss of amenity for residents there. On balance, officers’ view is that the extent of displacement is unlikely to significantly increase parking stress over a large area.

***“The rationale for introducing the proposals is flawed and the objectives will not be achieved”***

The rationale for introducing the proposals was to (i) eliminate the inconsistency whereby free short term parking is allowed in some areas and not in other similar areas (ii) to reinforce the wider approach in relation to the use of sustainable transport modes and (iii) to address the issue of likely lower levels of compliance and encourage “churn”.

There is an argument that inconsistency is unnecessary and that the Council should introduce different parking regimes that are particularly sensitive to the nature and needs of particular locations. Whilst there are inconsistencies in schemes and regimes (for example there are CPZs in some areas and not others and different CPZs have different operating times) it is the case that the Council has consistency in parking charges across the Borough and is moving to a more consistent rationale behind the introduction of controls. In making earlier decisions the Executive and then the Highways Committee would have been mindful of the rationale behind the proposals (as regards the issue of consistency) and would have made an informed decision.

A different approach could have been to move to consistency by introducing free short parking in similar locations. Notwithstanding the complexity of such an approach (and the resource implications it would need) the impact of such an approach is considered contrary to the Council’s wider strategy of encouraging more sustainable transport modes and making an appropriate allocation of kerbside parking space.

The issue of encouraging use of more sustainable transport modes has been discussed earlier. The use of parking controls and pricing regimes is part of a wider strategy to discourage non-essential car use and is considered a reasonable driver for the proposals.

Similarly there is no evidence to suggest that the introduction of pay and display controls to improve compliance without deploying additional enforcement resources is irrational.

***“The financial business case is flawed – in particular the impact on lost business rates has not been considered”***

The financial business case was set out in the report to Highways Committee on 23<sup>rd</sup> March and is re-stated in this report. The costs and income shown are based on officers best estimates based on information from comparable projects. In particular a prudent reasonable estimate of bay usage has been taken.

The business case does not take account of the financial implications beyond those directly associated with the proposal. It is not normal practice to take account of issues such as the collection of business rates or other taxes or

otherwise – particularly since there are many external factors that will impact on the viability and vitality of a location in addition to the availability and price of parking space.

***“The pay & display charges proposed are exorbitant”***

The Council has a policy of charging the same rates for parking in pay and display bays irrespective of where those bays are located. Consistent with this approach the standard regime of charges would be introduced at these locations.

The Council reviewed and revised its regime of charges in April 2011. That review included a comparison of the charges made by other Councils in London. When making the decision to amend the charges the Executive would have considered the proposed new charges in the context of transport and other policies, the financial situation, the impact of revising them and comparative charges elsewhere. In making their decision the Executive would not have been of the view that the charges are exorbitant.

***“The proposals will adversely impact on older people needing to access services in the 2 areas, rely on use of a car, and have limited disposable income”.***

The proposals have been subject to an equalities strand analysis to determine whether they would significantly disproportionately impact on older people. The analysis demonstrates that this is not the case.

***“The proposals are (wholly) finance driven”***

The report to Highways Committee outlined the 3 main issues associated with free short term parking arrangements in the Borough and discussed how the proposals would address those issues. The report did not propose the introduction of the controls to increase revenue. The financial implications were set out in the report and demonstrate that their introduction would generate additional income. In making decisions the Committee must be mindful of the financial implications. It is not unlawful to generate a surplus from parking activity provided that surplus is invested in transport related activity. Although the proposals will generate additional income officers are of the view it is erroneous to say they are finance driven.

## **ANNEXE B - EQUALITY STRAND ANALYSIS**

### **Introduction**

The equality assessment is being undertaken to determine the impact of the proposal to convert existing free parking bays in Preston Road and Bridge Road to pay and display parking bays.

This assesses the impact on the eight equality strands namely age; race; disability; gender; faith sexuality, maternity and pregnancy. Comments from the consultation process raised a concern that residents with mobility difficulties and particularly the elderly would be disadvantaged due to the charges.

Conclusions are based on census data, management information, and demographic analysis from Mosaic. We have cited the census 2001 data to ascertain knowledge of the resident demography. It is acknowledged that this census data is ten years old but the census 2011 information will not be available until next year. In addition we have used the data analysis conducted in the ‘Mayhew report’ of 2007 to construct the map showing distribution of populations affected by deprivation.

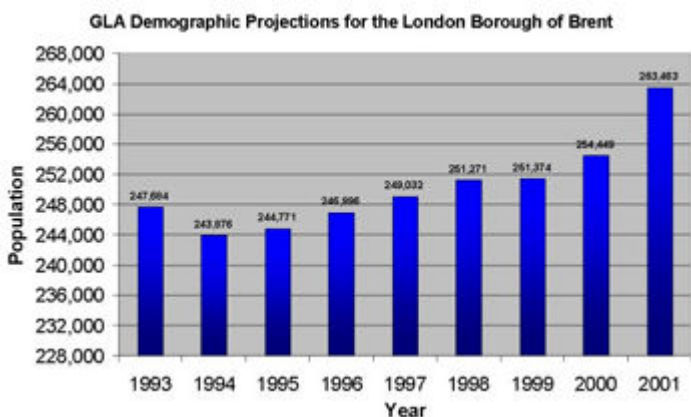
### **Potentially affected wards**

The wards directly affected are Preston and Barnhill, although it is recognised that some residents from neighbouring and other wards will also be affected.

### Brent's Population

Brent's population at the time of the 2001 census release was 263,464 and the Borough has experienced a growth rate of 3.2% since 1991.

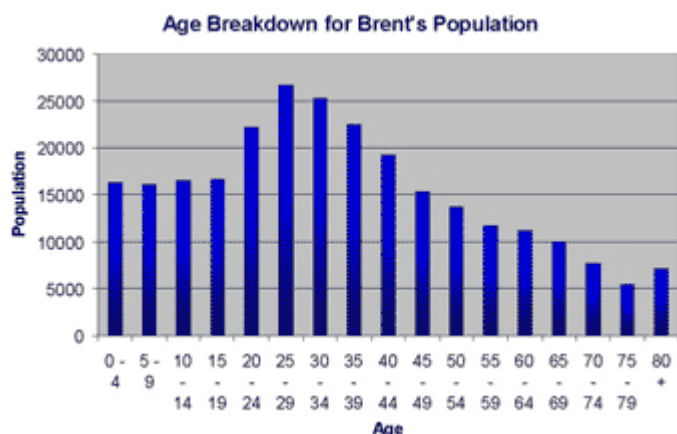
Brent has a high level of natural change, and is also characterised by a high levels of migration out of the borough which is responsible for the low level of overall population growth between 1991 and 1999. The fall in Brent's population in 1994 is due to the boundary change that occurred at the time.



It should be noted that Brent has a high level of migrant residents.

### 1. Age Equality

The chart below shows the age breakdown of the borough. Brent's population has a relatively young age structure with 25% of the population being in the 0 to 19 range and 37% in the 20 to 39 range. Brent's pensioners make up 14% of the population, lower than the Greater London and England and Wales figures of 15.5% and 18% respectively. Brent's population has a high fertility rate compared to most other London boroughs which accounts for the high level of 0 to 9 year olds.



© GLA 2001 Round Demographic Projections, Central Projection, updated March 2002

### Age and health by Ward

#### Preston Ward

## Population

Population			
Year	Males%	Females%	Total
2001	49	51	12832

*2001 population results from the most recent 2001 Census*

Area
<b>Size = 239.5 Hectares</b>
Density = 53.6 persons/hectare

Age Structure					
Age	Males	Females	Total	%	Borough average
<b>0 - 4</b>	448	384	830	<b>6.5</b>	6.1
<b>5 - 7</b>	261	221	482	<b>3.8</b>	3.7
<b>8 - 9</b>	136	163	299	<b>2.3</b>	2.4
<b>10 - 14</b>	412	369	781	<b>6.1</b>	6.2
<b>15</b>	98	72	170	<b>1.3</b>	1.3
<b>16 - 17</b>	181	178	359	<b>2.8</b>	2.7
<b>18 - 19</b>	142	150	292	<b>2.3</b>	2.4
<b>20 - 24</b>	507	428	936	<b>7.3</b>	8.4
<b>25 - 29</b>	627	591	1219	<b>9.5</b>	10.1
<b>30 - 44</b>	1506	1613	3118	<b>24.3</b>	25.4
<b>45 - 59</b>	961	1059	2024	<b>15.8</b>	15.5
<b>60 - 64</b>	268	293	562	<b>4.4</b>	4.3
<b>65 - 74</b>	448	482	933	<b>7.3</b>	6.7
<b>75 - 84</b>	243	337	580	<b>4.5</b>	3.5
<b>85 - 89</b>	40	110	152	<b>1.2</b>	0.9
<b>90+</b>	23	69	95	<b>0.7</b>	0.4

*'PA' pensionable age i.e. 60 or over for women and 65 or over for men'*

## Social Issues and Health

Health and provision of care			
	Total	%	Borough average
<b>Good</b>	9097	<b>70.9</b>	70.1
<b>Fairly Good</b>	2742	<b>21.4</b>	21.3
<b>Not Good</b>	993	<b>7.7</b>	8.6
<b>Person with Limiting long-term illness</b>	2004	<b>15.6</b>	15.6
<b>Provided unpaid care</b>	1285	<b>10.0</b>	8.7

Borough average refers to the mean average figure derived from all Brent's wards. Ward percentage figures highlighted in **red** fall above the borough average and those figures highlighted in **blue** fall below the borough average

## Population

Population			
Year	Males%	Females%	Total
2001	47	53	13188

*2001 population results from the most recent 2001 Census*

Area
Size = 297.5 Hectares
Density = 44.3 persons/hectare

Age Structure					
Age	Males	Females	Total	%	Borough average
0 - 4	354	408	762	5.8	6.1
5 - 7	167	267	534	4.0	3.7
8 - 9	145	196	341	2.6	2.4
10 - 14	446	444	890	6.8	6.2
15	82	102	184	1.4	1.3
16 - 17	200	179	379	2.9	2.7
18 - 19	180	126	307	2.3	2.4
20 - 24	472	507	982	7.5	8.4
25 - 29	514	500	1016	7.7	10.1
30 - 44	1387	1550	2932	22.2	25.4
45 - 59	1088	1188	2274	17.2	15.5
60 - 64	267	278	544	4.1	4.3
65 - 74	455	511	968	7.3	6.7
75 - 84	275	433	709	5.4	3.5
85 - 89	68	167	234	1.8	0.9
90+	25	97	132	1.0	0.4

*'PA' pensionable age i.e. 60 or over for women and 65 or over for men'*

## Social Issues and Health

Health and provision of care			
	Total	%	Borough average
Good	8951	67.9	70.1
Fairly Good	3013	22.9	21.3
Not Good	1224	9.3	8.6
Person with Limiting long-term illness	2283	17.3	15.6
Provided unpaid care	1285	9.7	8.7

Borough average refers to the mean average figure derived from all Brent's wards. Ward percentage figures highlighted in **red** fall above the borough average and those figures highlighted in **blue** fall below the borough average

The above tables for Preston and Barnhill wards indicate that these both have a higher than the borough average number of residents between 60 years and 90+.

In Preston ward 18.1% of the population are over the age of 60 compared with a 15.9% borough average and 92.3% were in good or fairly good health compared with a 91.4% borough average.

In Barnhill ward 19.6% of the population are over the age of 60 compared with a 15.9% borough average and 90.8% were in good or fairly good health compared with a 91.4% borough average.

There is no evidence that the introduction of pay and display parking bays in these wards would disproportionately disadvantage elderly residents with mobility difficulties.

## **2. Race Equality**

We have no reason to believe that the proposals would have a greater or lesser effect on this equality strand.

## **3. Disability Equality**

We have no reason to believe that the proposals would have a greater or lesser effect on this equality strand. There is the Blue Badge scheme managed by local authorities for people with severe mobility problems. It allows Blue Badge holders to park close to where they need to go; including on single or double yellow lines for up to three hours, except where there is a ban on loading or unloading or at 'on-street' parking meters and pay-and-display machines for free and for as long as they need to.

## **4. Gender**

We have no reason to believe that the proposals would have a greater or lesser effect on this equality strand.

## **5. Sexual Orientation**

We have no reason to believe that the proposals would have a greater or lesser effect on this equality strand.

## **6. Faith**

We have no reason to believe that the proposals would have greater or lesser effect on people on account of their faith.

## **7. Maternity**

We have no reason to believe that the proposals would have a greater or lesser effect on this equality strand.

## **8. Pregnancy**

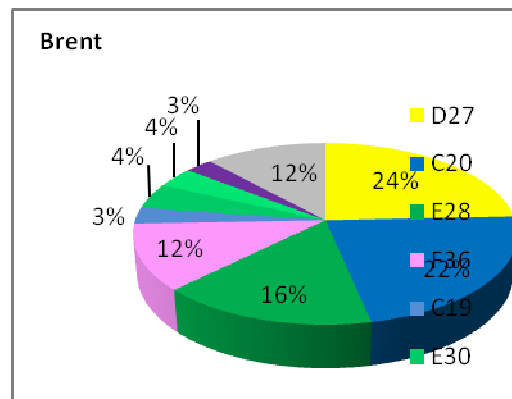


We have no reason to believe that the proposals would have a greater or lesser effect on this equality strand.

## Other Key Issues - Socio-economic factors

Mosaic Profile **Brent 2009**

Mosaic Type	Brent	
	Number	%
D27	26368	24.3
C20	24240	22.4
E28	17240	15.9
F36	12797	11.8
C19	3122	2.9
E30	4936	4.6
E29	4011	3.7
A2	2881	2.7
Other		11.8



The table provides mosaic information on the profile of Brent's residents.

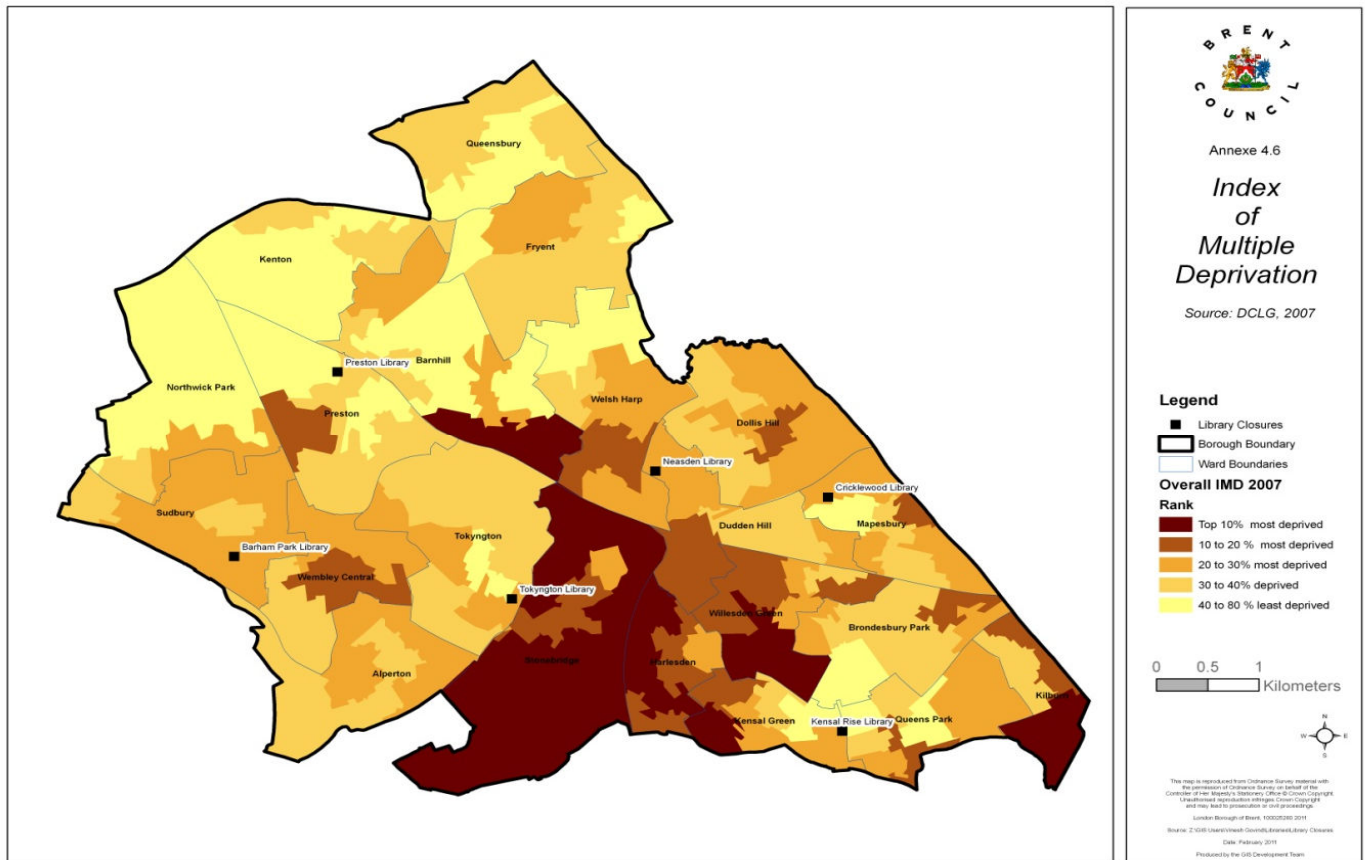
The top three mosaic (2009) types across Brent are D27, C20 and E28. For Preston these are C20, D27 and C19 and for Barnhill D27, F36 and A2

## Income and Deprivation

Whilst income and deprivation is not an equality strand, the results of the consultation indicated that many residents are concerned with the effect of the introduction of pay and display parking charges.

Although many of Brent's residents are affluent, parts of the borough continue to suffer high levels of social and economic disadvantage. Nationally, Brent is ranked 53rd out of 354 areas in the Indices of Multiple Deprivation (IMD) 2007 (1=most deprived,354=least deprived).This is a drop of 28 places from 2004, moving Brent from being within the 25% most deprived local authorities in the country to be within the 15% most deprived.

The map below identifies areas of highest deprivation.



The table below ranks wards according to their IMD.

## Deprivation

<b>ODPM Indices of Deprivation 2004 (Ward level figures)</b>								
Ward Name	IMD Rank	Rank of Income Domain	Rank of Employment Domain	Rank of Health Domain	Rank of Education Domain	Rank of Housing Domain	Rank of Crime Domain	Rank of Living env Domain
Alperton	12416	9046	16582	21619	17212	2539	15327	17098
Barnhill	14371	10942	16579	17611	22538	3024	13507	23256
Brondesbury Park	12772	11650	14025	16489	25510	4065	7109	18142
Dollis Hill	12899	9024	14553	20129	18731	4104	15962	17636
Dudden Hill	12791	10532	14408	19566	21672	3934	9555	16698
Fryent	14706	10971	16499	20240	23624	4708	12843	15872
<b>Harlesden</b>	<b>4089</b>	<b>2083</b>	<b>3849</b>	<b>10354</b>	<b>12764</b>	<b>3881</b>	<b>5702</b>	<b>12610</b>
Kensal Green	8852	7534	9000	14626	19315	4968	8378	9834
Kenton	21567	19420	22680	23701	29313	5368	15927	19313
Kilburn	6312	5156	6397	9243	17028	4112	5377	16554
Mapesbury	11585	10031	11766	13904	24288	4821	9143	14884
Northwick Park	20070	17921	22460	23226	28333	3865	18161	20262
Preston	17282	12984	19279	21036	26374	4591	17907	19329
Queens Park	11518	10536	11522	15239	23013	5289	8839	11301
Queensbury	16652	12125	18695	21421	24726	4694	14805	20363
<b>Stonebridge</b>	<b>3920</b>	<b>2115</b>	<b>5396</b>	<b>12528</b>	<b>11250</b>	<b>1698</b>	<b>8829</b>	<b>13042</b>

<b>Sudbury</b>	11671	9312	15148	17486	22162	2285	11387	17735
<b>Tokington</b>	13109	10170	14522	20244	20934	3698	13336	18436
<b>Welsh Harp</b>	12020	9398	14648	20003	19233	3416	12767	12620
<b>Wembley Central</b>	9002	7052	11129	16146	17888	3746	7649	11216
<b>Willesden Green</b>	9244	6980	10168	14005	20878	3947	8902	13776

### **IMD and domains**

The IMD 2004 was constructed by combining the seven transformed domain scores for Lower Level Super Output Areas. The Lower Layer comprises groupings of Output Areas and has a minimum population size of 1,000 persons. Each zone in the lower layer is constrained within Census ward boundaries.

### **IMD Ward Ranks**

Ward Ranks have been obtained using an average of the combined Lower Super Output Area SOA ranks for each ward. The SOA with a rank of 1 is the most deprived, and 32482 the least deprived, on this overall measure.

### **Areas of High Deprivation**

The wards highlighted in orange contain combined SOA,s with an average IMD that falls within the top 15% deprived SOA's in the country. Just over a third of SOA,s in Stonebridge ward fall into the 10% most deprived category.

Source: 2001 Census

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The neighbourhoods experiencing the highest levels of deprivation are largely located in the south of Brent. However, this situation is changing with high levels of deprivation now seen in pockets of the north of the borough. The most deprived residents also have the lowest income levels, highest unemployment levels, poor and overcrowded housing and the worst health outcomes.

In conclusion, both Preston and Barnhill wards have a higher than average IMD when compared to other wards in the borough where pay and display parking has operated successfully. Therefore there is no evidence to suggest that introducing pay and display parking would significantly disadvantage residents of these wards.