

Extension of HY CPZ : APPENDIX C - EQUALITIES IMPACT ASSESSMENT

Department: Environment and Neighbourhoods	Person Responsible: Tim Jackson
Service Area: Highway and Transport Delivery	Timescale for Equality Impact Assessment : By 07.10.2011
Date: October 2011	Completion date: 07.10.2011
Name of service/policy/procedure/project etc: HY Controlled Parking Zone (CPZ) extension in Harlesden ward.	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 18 th October 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?

**HY Controlled Parking Zone (CPZ) extension in Harlesden ward.
– 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

At the 19th October 2010 Committee meeting, Members were presented with the results of the HY CPZ extension. The streets consulted were; Ambleside Road Curzon Crescent, Inman Road, Marian Way, Northcote Road, Oldfield Road, Redfern Road, Roundwood Road, Brownlow Road, Church Road, Goodson Road, Hawkshead Road, Leopold Road, Outgate Road, West Ella Road, Butler Road(Private Road), Beveridge Road(Private Road) and Suffolk Road.

It should be noted that the consultation was undertaken before the Executive Committee decision on an emission based parking regime was decided and became operational from 1st April 2011.

Noting that the responses to the consultation was made without knowledge of the proposed change, Members decided that in areas where the results of consultation has indicated a broad support for controlled parking, residents be re-consulted after a decision on the emission based permit charging was made.

Re-consultation on the proposed CPZ was carried out in July 2011 on the same streets mentioned in above. The questionnaire asked residents / businesses if they want to join the existing HY CPZ based on the new system of charging for residents' permits (emissions based).

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 were no objections received on the proposals. However, concerns were raised on the affordability of obtaining permits. There were also concerns received from some disabled residents of the area about the lack parking spaces and parking permits.

The report to Highways Committee on 18th October 2011 outlines the comments received in relation to the public consultation.

Having given this proper consideration, the Committee are recommended to approve implementation of the proposals on this area.

2.2 Recommendations

The recommendations in the Highways Committee report are as follows;

That Committee notes the results of the proposed zone HY extension regarding consultation and agrees to extend the

CPZ in all streets consulted as detailed in the report subject to satisfactory statutory consultation.

- (i) That, having given proper consideration of the matters raised by way of concerns raised as part of the public consultation 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 HY CPZ extension scheme as described in this report
- (ii) That Committee authorises the Head of Transportation to consider objections and representations to the statutory consultation mentioned in the detail part of this report and that he report back to members if there are substantial objections or concerns raised, otherwise he is authorised to implement the schemes.

2.4 Background – General

The area covered by the proposed extension of the CPZ HY is currently subject to significant parking pressures. There is inadequate parking space available to all those people wishing to park in the area according to the people who live in the area which triggered this consultation. This inadequacy creates significant problems for residents, visitors and businesses in accessing the area and undertaking their everyday activities.

The Committee delegated approval to the Head of Transportation to implement the Controlled Parking Zone in the identified area i.e HY extension highlighted in the report subject to appropriate consultation arrangements being followed and the identification of funding for implementation.

The Committee are advised that residents and businesses in the area of the proposed CPZ 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.

Proposals for HY CPZ extension were developed. Residents, businesses were consulted on the proposals.

2.5 Existing arrangements & background HY extension area.

The area consulted is bounded by Church Road to the west, the Willesden New Cemetery to the east, existing HY CPZ to the north and south. Although, the area is residential in nature, it is in the vicinity of local shops of Harlesden and Church Road areas. There are three schools (St. Joseph RC Primary School located at Goodson Road), (Leopold Primary School located at Hawkshead Road)and (Curzon Crescent Nursery School located at Curzon Crescent) in the area. There is a Charity organisation (the Samaritan located at Leopold Road).

2.6 Consultation

Consistent with the arrangements approved by Highways Committee, a public consultation on the proposals took place in July 2011.

In total 1444 addresses (17 streets) were consulted and 309 (21%) responses were received. Overall 52% of respondents supported the proposals. The full results of the consultation and the main areas of concern from both supporters and opponents of the scheme are shown in the committee report.

During the consultation period concerns about the proposed parking controls were also raised by schools and charity organisations in the area. Leopold Primary School, St Joseph's RC Junior Infant School and Curzon Crescent Nursery School were informed that their staff (teachers) are entitled to special parking permits (maximum 10) if the proposed controlled parking zone is implemented as long as their school travel plans been updated. Officers also met with the Samaritans Charity based in Leopold Road to discuss their concerns. There were also concerns raised by some

disabled residents about the lack of parking spaces.

Leopold Primary School & St Josephs Primary Schools have a school travel plan although neither of them submitted for a review this year. Both the schools have been sent consultation letters and questionnaire and awaiting replies.

Schools can have a maximum of 10 special permits at a cost of £75 each.

It is intended to arrange further meetings with both of the schools and Curzon Crescent Children's Centre if we are to progress the scheme.

Curzon Crescent Children's Centre does not have a school travel plan, on several occasions they have been contacted to develop one but do not feel it is of benefit to them. Officers will continue discussions on this matter.

The Brent Samaritans in Leopold Road can have business permits, maximum of three and further provisions have been considered in the scheme design to provide short-term Pay & Display parking up to 4 hours in Leopold Road and around the St Josephs School.

Pay & Display parking facilities are also considered around the Leopold Primary School and in Curzon Crescent with a proposed Loading bay next to the Post Office.

There are existing 22 disabled parking bays on streets bounded by the proposed HY CPZ extension. These are located in Ambleside Road (3), Inman Road (1), Marian Way (1), Northcote Road (1), Oldfield Road (3), Redfern Road (4), Roundwood Road (2), Brownlow Road (3), Leopold Road (1), Outgate Road (1), West Ella Road (2). All these bays are to be retained. The Blue Badge holders are also permitted to park free of charge by displaying their Blue Badge within the CPZ,s including shared bays. They can also park on single yellow and double yellow lines for up to 3 hours except where there is a ban on loading or unloading or at pay and display bays free of charge for as long as they need to.

2.8 Financial Implications

These are set out in the committee report.

2.9 Legal Implications

The introduction of parking controls require 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 the uncontrolled area into a Controlled Parking Zone (CPZ) 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 your 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 has been 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, a public consultation on the proposed changes to the area started on 5th July for 25 days. The consultation documents were sent to all affected residents/businesses in the area and the documents were also available on the Council's website.

Statutory consultation on the necessary Traffic Orders will take 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 will be notified of the proposals by letter.

A meeting between officers and Samaritan was held on 4th August to discuss the proposal.

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 18th October 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 scheme is 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 CPZ in the area will provide more opportunity for residents and businesses in the area to find parking spaces

including shoppers to the area.

It also leads to more effective enforcement particularly those motorists who park illegally on corners causing obstructions to all road users (assuming the level of resources does not change) which in turn improve safety.

13. What is the justification for taking these measures?

There is inadequate parking space available to all those people wishing to park near their homes. This inadequacy creates significant problems for residents, visitors and businesses in accessing the area and undertaking their everyday activities.

The Uncontrolled area represents an inconsistency since some motorists parking in these streets are avoiding to buying permits live in existing CPZ i.e existing HY.

It could be argued that this situation is contrary to the Council's general policy of encouraging the use of more sustainable transport modes and discouraging non-essential car journeys

Therefore, the justification is that the introduction of CPZ 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 CPZ in relation to the design of the scheme i.e number of parking bays provided and make sure there is a right balance in terms of available parking spaces for residents and visitors parking places and those holding blue badges.

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 except contacting those disabled residents who have raised concerns for their parking needs.

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/monitoring of the scheme will be undertaken by officers and funded through the existing/available 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: 07-10-2011

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:

H Amir-Hosseini, Team Leader- Design Group

ANNEXE A – RESPONSES TO THE CONSULTATION

Responses to of the consultation

Summary

In total 1444 addresses (17 streets) were consulted and a good (21%) response was received. Overall 52% of respondents supported the proposals. The full results of the consultation and the main areas of concern from both supporters and opponents of the scheme are shown in Appendix B of this report.

The analysis shows, those streets located geographically close to the existing HY CPZ (Ambleside Road (65%), Curzon Crescent (62%), Inman Road (96%), Marian Way (78%), Northcote Road (100%), Oldfield Road (53%) and Redfern Road (68%)) supported the proposals. While the responses from Roundwood Road (47%) and Brownlow Road (44%) show close support to the proposals.

The analysis also shows, Church Road (32%), Goodson Road (25%), Hawkshead Road (33%), Leopold Road (39%), Outgate Road and West Ella Road (23%) opposed the proposals. Butler Road is private road and the results from Suffolk Road are split equally between support and opposition.

No formal objections are received to date.

Some of the comments received are as follows:

- The scheme is unfair and it's an extra tax payable by residents. No justification to pay to park.
- The scheme will damage business.

Considering each issue in turn

ANNEXE B - EQUALITY STRAND ANALYSIS

Introduction

The equality assessment is being undertaken to determine the impact of the proposal to implement HY CPZ extension.

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 be disadvantaged due to implementation of CPZ.

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.

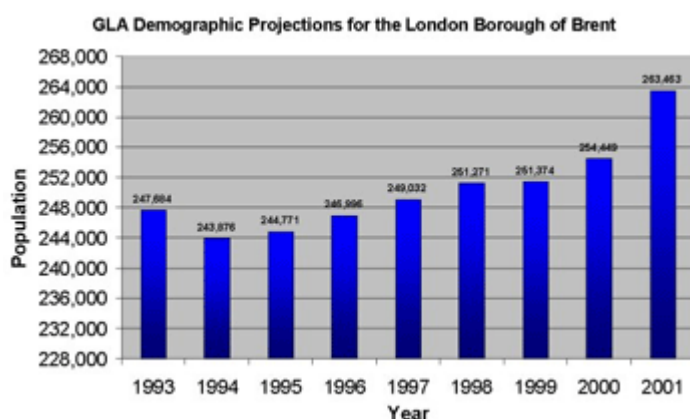
Potentially affected wards

The ward directly affected is Harlesden.

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

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

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. In addition there are 22 disabled parking bays designated for blue badge holders.

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

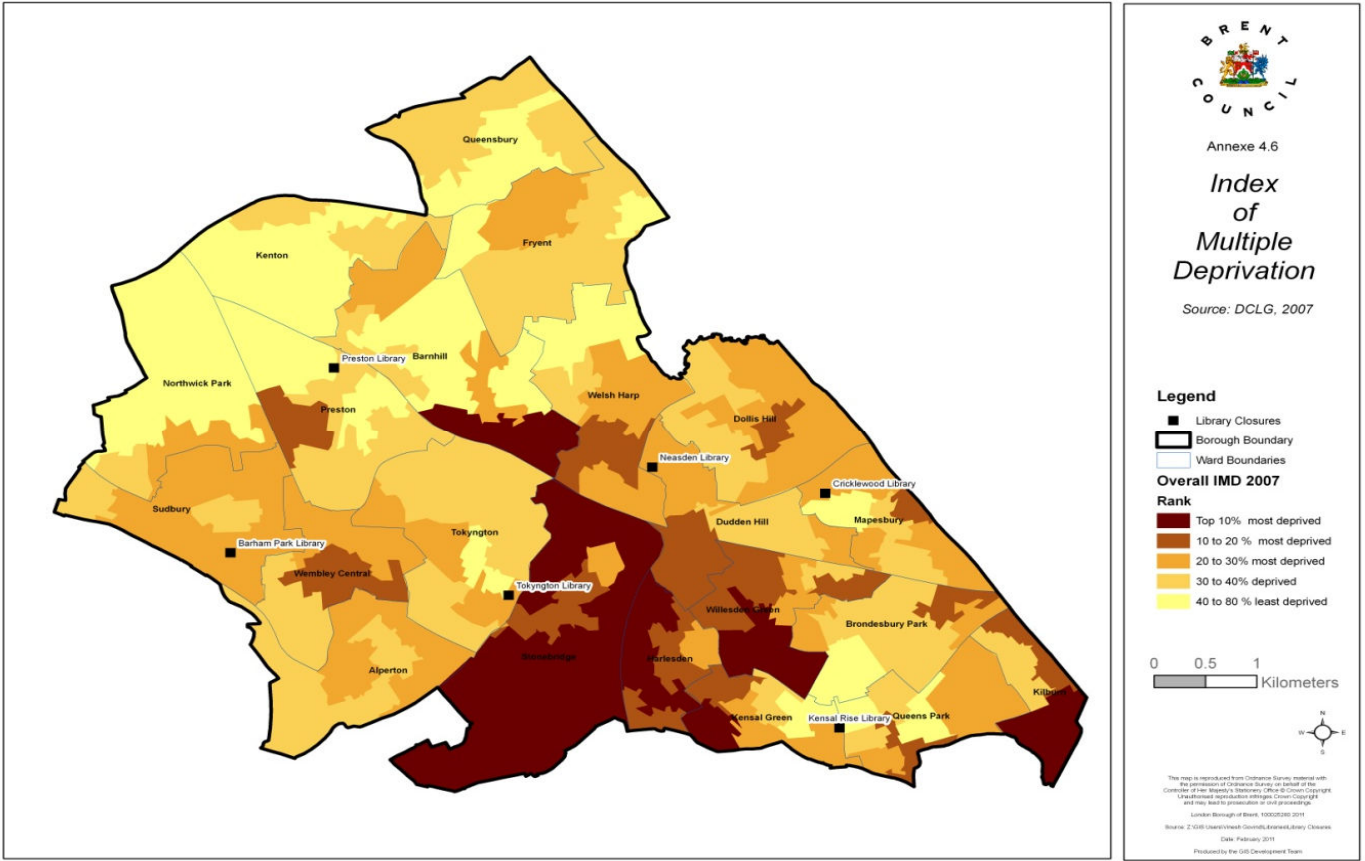
We have no reason to believe that the proposals would have a greater or lesser effect on this equality strand.

Income and Deprivation

Whilst income and deprivation is not an equality strand, the results of the consultation indicated that some of the residents are concerned with the effect of the introduction of a CPZ 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

ODPM Indices of Deprivation 2004 (Ward level figures)								
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
Harlesden	4089	2083	3849	10354	12764	3881	5702	12610
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
Stonebridge	3920	2115	5396	12528	11250	1698	8829	13042

Sudbury	11671	9312	15148	17486	22162	2285	11387	17735
Tokington	13109	10170	14522	20244	20934	3698	13336	18436
Welsh Harp	12020	9398	14648	20003	19233	3416	12767	12620
Wembley Central	9002	7052	11129	16146	17888	3746	7649	11216
Willesden Green	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, Harlesden is classified the second highest level of deprivation when compared to other wards in the borough where CPZ's were operated successfully particularly majority of the Harlesden area is already covered by Controlled Parking which has successfully improved on streets parking for local residents and businesses. Therefore, there is no evidence to suggest that introducing a CPZ extension to an existing CPZ would significantly disadvantage local and businesses in this area.