

Appendix 8

Equality Analysis Evidence Document					
<b>(Please note, this will form part of a public facing document. If you have any questions about this, please contact <a href="mailto:Equalities@wiltshire.gov.uk">Equalities@wiltshire.gov.uk</a>)</b>					
<b>Title: What are you completing an Equality Analysis on?</b>					
Amendments to the Wiltshire Local Transport Plan (LTP) 2011-2026 – Car Parking Strategy: Options 2 to 6					
<b>Why are you completing the Equality Analysis?</b> (please tick any that apply)					
Proposed New Policy or Service	Change to Policy or Service	MTFS (Medium Term Financial Strategy)		Service Review	
	✓				
<b>Version Control</b>					
Version control number	2b	Date	13/12/17	Reason for review (if appropriate)	To meet ongoing financial challenges.
<b>Risk Rating Score</b> (use <a href="#">Equalities Risk Matrix</a> and guidance)					
**If any of these are 3 or above, an Impact Assessment <b>must</b> be completed. Please check with <a href="mailto:equalities@wiltshire.gov.uk">equalities@wiltshire.gov.uk</a> for advice					
<b>Criteria</b>	<b>Inherent risk score on proposal**</b>			<b>Residual risk score after mitigating actions have been identified</b>	
Legal challenge	1			1	
Financial costs/implications	1			1	
People impacts	6			6	
Reputational damage	8			8	
<b>Section 1 – Description</b> of what is being analysed					

## Background

The current Wiltshire LTP Car Parking Strategy was approved by cabinet at its meeting on 17 March 2015 following a comprehensive review and consultation exercise in 2014 which attracted over 5,000 responses from individuals and organisations.

While there are a number of aspects to car parking management, in essence a balance needs to be found between three key factors:

- **Regeneration:** using parking measures to support town centre regeneration.
- **Restraint:** using parking controls as a means of restraining / managing traffic and improving environmental quality, or to encourage the use of sustainable transport modes.
- **Revenue:** securing sufficient revenue to cover the costs of providing car parking, and using any surplus revenue to fund other important local services.

In order to help find the right balance between the above factors, relevant economic, social and environmental data was used to inform the review. A key outcome of this process was the move to a more 'fine grained' approach to car parking management, and in particular charges, based on the local circumstances of each car park / settlement (see below).



## Operational Cost Pressures

The council's parking services is facing significant cost pressures. These include business rate payments, essential equipment upgrades and maintenance works, and inflation costs. The demands on the service are also increasing; particularly requests from residents, schools, businesses and parish / town councils asking for extra parking enforcement and maintenance to be undertaken. It is also important to note that surplus revenue from parking charges supports other transport measures including non-commercial, but essential local bus services. This is one of the main reasons why the council has been in a position to retain the vast majority of these bus services, in contrast to other local authorities which have seen significant cuts to services.

## Consultation on Options

To address the operational and demand pressures outlined above, and to fund a number of proposed technology and operational improvements, at its meeting on 12 September 2017, Wiltshire Council's cabinet approved seven possible charging options for inclusion in a public consultation exercise undertaken between 28 September 2017 and 23 November 2017:

- Option 1: Apply an inflation increase to all parking charges
- Option 2: Introduce Sunday and Bank / Public Holiday charging at all car parks
- Option 3: Charge in all Wiltshire Council car parks
- Option 4: Discontinue free event parking in November and December
- Option 5: Base season ticket charges on the standard rate charges
- Option 6: Harmonise residents' parking permit charges
- Option 7: Reduce the parking grace period to ten minutes.

alternative funding streams from local communities.

Option 1

As Option 1 could be implemented via a Traffic Regulation Order (TRO) variation notice, at its meeting on 12 September 2017 cabinet delegated authority to the cabinet member for highways, transport and waste to progress this option separately - (an officer decision on the consultation responses and proposed implementation of Option 1 was made by the Director for Highways and Transport on 2 January 2018). The implementation of increased car parking charges is then planned to occur on 1 February 2018.

Option 7

In view of the consultation responses, it is proposed that Option 7 is not advanced (i.e. the grace period of 15 minutes is retained).

Options Being Analysed

At its meeting on 30 January 2018, cabinet is being asked to agree to the implementation of Options 2 to 6 through an amendment to the relevant Traffic Regulation Orders (TROs). The timetable for implementation is as follows:

	Jan 18	Feb	Mar	Apr	May	Jun	Jul	Aug
Cabinet meeting	■							
TRO documents drafted liaising with Council's legal team	■	■						
Documents checked / approved		■						
Advert sent to press and appears in local press			■					
TRO public consultation			■	■				
Objections received and report drafted and submitted to Cabinet Member			■	■	■			
Cabinet Member report process				■	■			
Cabinet Member decision advised to people who made representations					■	■		
TRO(s) sealed and advertised						■	■	
TRO(s) operational							■	■

**Section 2A** – People or communities that are currently **targeted or could be affected** by any change (please take note of the Protected Characteristics listed in the action table).

Parking is available to all motorists regardless of their Protected Characteristics (the parking stock in Wiltshire is a mixture of free and paid for parking dependent on location).

As a result, all car park and transport users in Wiltshire may potentially be directly or indirectly affected by the implementation of Option 1 and all the protected groups as defined by the Equality Act 2010 could be impacted by the inflation increase to car parking charges. However, the Protected Characteristics that are most likely to be affected are:

- Religion
- Other (e.g. low income and rurality).

**Section 2B** – People who are **delivering** the policy or service that are targeted or could be affected (i.e. staff, commissioned organisations, contractors)

Some Wiltshire Council staff may potentially be affected by the review.

**Section 3** –The underpinning **evidence and data** used for the analysis (Attach documents where appropriate)

Prompts:

- What data do you collect about your customers/staff?
- What local, regional and national research is there that you could use?
- How do your Governance documents (Terms of Reference, operating procedures) reflect the need to consider the Public Sector Equality Duty?
- What are the issues that you or your partners or stakeholders already know about?
- What engagement, involvement and consultation work have you done? How was this carried out, with whom? Whose voices are missing? What does this tell you about potential take-up and satisfaction with existing services?
- Are there any gaps in your knowledge? If so, do you need to identify how you will collect data to fill the gap (feed this into the action table if necessary)

#### Previous Review / Consultation

An extensive public consultation exercise was carried out as part of the review of the Wiltshire LTP Car Parking Strategy in 2014/15. This included individual consultation web pages for the 14 settlements with Wiltshire Council car parks. These pages included information on the review and associated supporting documents:

- draft revised LTP Car Parking Strategy document
- individual Town Profiles containing a variety of economic, social and environmental information relating to a town's local circumstances
- individual settlement questionnaires and draft charging summaries
- Strategic Environmental Assessment (SEA), Habitats Regulation Assessment (HRA) and Equality Analysis Evidence Document (EAED).

A variety of means were used to inform people of the consultation:

- Web portal
- Documents in specific libraries
- Press releases
- Parish newsletters
- Social media promotion
- Video message, area board announcements, area board blog sites
- Featured throughout the consultation process on the Council's website
- Posters in main Wiltshire Council pay and display car parks
- Correspondence with chambers of commerce
- Correspondence with Salisbury Business Improvement District
- Covered in the winter edition of the Your Wiltshire magazine
- Emails sent to some 6,000 area board contacts
- Promotion of the consultation by DEVELOP (which supports voluntary and community organisations) and the Wiltshire Forum of Community Area Partnerships (WFCAP)
- Included in the November 2014 business newsletter sent by the Wiltshire Council economic development team to approx. 2,000 business contacts
- Emails sent to Wiltshire 100 business contacts (107 businesses)
- Emails sent to some 4,000 leisure service contacts.

In addition to the online consultation material, five area stakeholder workshops were held in

Chippenham, Devizes, Salisbury, and Trowbridge.

A number of national/local policy documents and relevant research documents were used to inform the review including the following:

- National Planning Policy Framework (Department for Communities and Local Government (DCLG), March 2012)
- Action for Roads: A network for the 21st century (Department for Transport (DfT), July 2013)
- Creating Growth, Cutting Carbon: Making Sustainable Transport Happen (DfT, January 2011)
- Door to Door: A strategy for improving sustainable transport integration (DfT, March 2013)
- Consultation on local authority parking (DfT, December 2013)
- Parking Strategies and Management (The Institute of Highways and Transportation, July 2005)
- Car Parking Research (Yorkshire Forward, 2007)
- Parking: Policies for sustainable communities (Federation of Small Businesses, 2008)
- Parking Measures and Policies: Research Review (Transport Research Laboratory, May 2010)
- Spaced Out: Perspectives on Parking Policy (RAC Foundation, July 2012)
- The Relevance of Parking in the Success of Urban Centres (London Councils, 2012)
- Re-Think: Parking on the High Street (British Parking Association and the Association of Town & City Management, 2013)
- Town Benchmarking (Towns Alive).

Ultimately, as set out in section 1, a more 'fine grained' approach to car parking management, and in particular charges, based on the local circumstances of each car park / settlement was established.

#### Current Review / Consultation

Given the above, the current review looking at potential charging options has been more limited in nature.

A public consultation exercise was held between 28 September 2017 and 23 November 2017. The consultation was hosted on the Wiltshire Consultation Portal (<http://consult.wiltshire.gov.uk/portal>) and included a link to the questionnaire which sought responses on the options agreed by cabinet at its meeting on 12 September 2017.

In addition to the questionnaire, the following supporting information was made available:

- Range of parking charges in Wiltshire
- Off-street parking charges in key competitor towns
- Schedule of proposed increased car parking charges
- Proposed charges in currently free car parks
- Proposed season ticket charges
- Equality Analysis Evidence Document
- Frequently Asked Questions
- Link to the Joint Strategic Assessment webpage (<http://wiltshirejsa.org.uk/>).

A variety of means were used to inform people of the consultation. A news release was issued on 28 September 2017 (as a result, the consultation was picked up by several local news outlets). In addition, an article was included in the 11 September 2017 edition of the Parish Newsletter and the October 2017 and November 2017 Cabinet Member Highways Newsletters. Information was also contained on the Wiltshire Council Facebook and Twitter feeds. Lastly, the Consultations tab on the council's home webpage provides a direct link to the Wiltshire Consultation Portal.

In total, 1,377 people and organisations responded by completing questionnaires. Separate written comments (i.e. non-questionnaire returns) were also received from a number of individuals, organisations and town / city councils.

**\*Section 4 – Conclusions** drawn about the impact of the proposed change or new service/policy

Prompts:

- What actions do you plan to take as a result of this equality analysis? Please state them and also feed these into the action table
- Be clear and specific about the impacts for each Protected Characteristic group (where relevant)
- Can you also identify positive actions which promote equality of opportunity and foster good relations between groups of people as well as adverse impacts?
- What are the implications for Procurement/Commissioning arrangements that may be happening as a result of your work?
- Do you plan to include equalities aspects into any service agreements and if so, how do you plan to manage these through the life of the service?
- If you have found that the policy or service change might have an adverse impact on a particular group of people and are **not** taking action to mitigate against this, you will need to fully justify your decision and evidence it in this section

The possible impacts of implementing Options 2 to 6 on each identified Protected Characteristic group are considered to be as follows:

Age:

Issue: Young people and the elderly are more likely to be on low incomes and are therefore more likely to be adversely impacted by any higher parking charges.

Response: As set out in section 1, surplus revenue from parking charges supports other transport measures including non-commercial, but essential local bus services. This is one of the main reasons why the council has been in a position to retain the vast majority of these bus services, in contrast to other local authorities which have seen significant cuts to services.

Religion and Belief:

Issue: Introduced or higher parking charges for people attending places of worship on a Sunday.

Response: The proposed Sunday parking charges are significantly less than the Mon-Sat charges. As set out in section 1, surplus revenue from parking charges supports other transport measures including non-commercial, but essential local bus services. This is one of the main reasons why the council has been in a position to retain the vast majority of these bus services, in contrast to other local authorities which have seen significant cuts to services.

Other:

Issue: People on low incomes are more likely to be adversely impacted by any higher parking charges.

Issue: People living in rural areas with little public transport and who therefore need to use a car to access shops and services in the towns, are more likely to be adversely impacted by any higher parking charges.

Issue: Increased parking charges may have some influence on reducing the numbers of people accessing local towns and businesses (i.e. increased charges may result in people not visiting certain areas so often).

Version 1:3 May 2017

Response: As set out in section 1, surplus revenue from parking charges supports other transport measures including non-commercial, but essential local bus services. This is one

of the main reasons why the council has been in a position to retain the vast majority of these bus services, in contrast to other local authorities which have seen significant cuts to services.

If the implementation of Options 2 to 6 is not agreed then this could have the following possible impacts on each identified Protected Characteristic group:

Age / Other

Issue: The loss of additional parking revenue may impact on the council's ability to support some non-commercial local bus services which provide access to essential services and facilities.

Disability:

Issue: The maintenance of car parks has been reduced to a minimum and if continued could become an issue in terms of accessibility particularly for disabled people.

If necessary, an action table detailing equality issues and actions to mitigate will be developed as part of the implementation process.

**\*Section 5 – How will the outcomes from this equality analysis be monitored, reviewed and communicated?**

Prompts:

- Do you need to design performance measures that identify the impact (outcomes) of your policy/strategy/change of service on different protected characteristic groups?
- What stakeholder groups and arrangements for monitoring do you have in place? Is equality a standing agenda item at meetings?
- Who will be the lead officer responsible for ensuring actions that have been identified are monitored and reviewed?
- How will you publish and communicate the outcomes from this equality analysis?
- How will you integrate the outcomes from this equality analysis in any relevant Strategies/Polices?

The LTP Car Parking Strategy sets out the overarching objectives of the Wiltshire LTP Strategy and how a parking strategy could contribute. Those objectives considered most relevant to the equality analysis are set out below:

Ref.	LTP Objective	How a parking strategy could contribute
SO1	To support and help improve the vitality, viability and resilience of Wiltshire's economy and market towns.	By making it easy for shoppers and tourists to find car parking spaces in Wiltshire's market towns.  By setting car park charges that are broadly comparable with key centres in neighbouring areas.
SO5	To improve sustainable access to a full range of opportunities particularly for those people without access to a car.	By using surplus parking revenues to subsidise non-commercial bus services.  By providing appropriate Blue Badge car parking spaces.
SO8	To improve safety for all road users and to reduce the number of casualties on Wiltshire's roads.	By ensuring that car parks are 'safer by design'.
SO15	To reduce barriers to transport and access for people with disabilities and mobility impairment.	By providing appropriate Blue Badge car parking spaces.

SO18	To enhance the journey experience of transport users.	<p>By making it easy for people to find car parking spaces and so avoid 'searching traffic'.</p> <p>By improving the efficiency of the council's parking service.</p>
------	---	---

The LTP Car Parking Strategy sets out a number of relevant policies including Policy PS12 'Improving access and use':

*The council will promote the convenient access to parking facilities in Wiltshire by ensuring that:*

- *parking for disabled motorists (Blue Badge holders) is provided in line with recognised national guidance (as a minimum)*
- *where appropriate (e.g. at supermarkets and retail centres), provision is made for 'parent and child' spaces*
- *parking facilities are clearly signed and that good levels of information on the location and availability of parking is provided*
- *facilities are available for cashless payments by mobile phone, telephone or online*
- *parking facilities are 'safer by design'*
- *facilities for service vehicles or those delivering goods are, as far as possible, segregated to avoid conflict and their use as overflow car parking areas.*

This Equality Analysis Evidence Document is a working document which will be added to / amended at various stages of the development / implementation phases of the project. Each version will be version controlled to demonstrate the development in the process and evidence the due regard to the Public Sector Equality Duty.

For all cabinet and corporate leadership team (CLT) meetings, a full copy of the most current Equality Analysis Evidence Document will be included with the meeting papers.

**\*Copy and paste sections 4 & 5 into any Committee, CLT or Briefing papers as a way of summarising the equality impacts where indicated**

**Please send a copy of this document to [Equalities@wiltshire.gov.uk](mailto:Equalities@wiltshire.gov.uk)**

Completed by:	Robert Murphy Principal Transport Planner and Development Manager (South and West)	
Date	13 December 2017	
Signed off by:	Emily Higson Corporate Support Manager (Partnerships, Performance & Governance)	
Date	20 December 2017	
To be reviewed by:		
Review date:		
For Corporate Equality Use only	Compliance sign off date:	