



# WALTHAM FOREST COUNCIL FULL EQUALITY ANALYSIS (EA) TEMPLATE

Decision *Extend hours of Pay to Park (P2P) bays within the Borough and remove free parking periods* Date *26/07/2024*

## IMPORTANT NOTES:

1. THIS FRONT SHEET IS AN ESSENTIAL PART OF THE EA – COMPLETE THE TEMPLATE AND SUBMIT IT AS A SINGLE DOCUMENT.
2. IN RARE CASES, WHEN COMPLETING THE ASSESSMENT IT MAY BECOME APPARENT THAT THE RECOMMENDATIONS WOULD LEAD TO UNLAWFUL DISCRIMINATION E.G. A PROPOSAL TO PAY MEN MORE THAN WOMEN. IF SO, STOP, RECONSIDER YOUR PROPOSAL AND SEEK ADVICE.

THE HEAD OF SERVICE OR DIRECTOR WHO IS RESPONSIBLE FOR MEMBER LEVEL REPORTS MUST BE SATISFIED WITH THE FINALISED EQUALITY ANALYSIS AND FOR MAJOR PROPOSALS, IT IS SENSIBLE TO ENSURE YOUR LEAD MEMBER HAS BEEN CONSULTED.



## What is an Equality Analysis (EA) for? [Double click here for more information / Hide](#)

The Council must have due regard to its Public Sector Equality Duty (PSED) when making decisions at member and officer level. An EA is the best method by which the Council can provide the evidential analysis to comply with the equality duty, particularly for major decisions. However, the level of analysis required should only be proportionate to the relevance of the duty to the service or decision. Some decisions will require detailed equalities consideration, e.g. a decision on adult

social care provision or reduction of grants to voluntary organisations, whereas the performance of other functions will have less of an equalities impact, e.g. the appointment of committees where only a limited assessment is required. In rare cases, the Courts have said there may be no impact. If you think this may be the case, then you should undertake the EA screening process first to determine if you need to complete this full EA and have a rational basis for this conclusion.

## What is the Public Sector Equality Duty (PSED)? [Double click here for more information / Hide](#)

The public sector equality duty (s.149, Equality Act 2010) requires the Council, when exercising its functions, to have “due regard” to the need to:

5. eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited under the Act,
6. advance equality of opportunity between those who share a “protected characteristic” and those who do not share that protected characteristic and
7. foster good relations between persons who share a relevant protected characteristic and persons who do not share it (this involves having due regard, in particular, to the need to (a) tackle prejudice, and (b) promote understanding).

These are collectively referred to in this EA as the equality aims. Advancing equality (the second equality aim) involves having due regard, in particular, to the

need to:

- Removing or minimising disadvantages suffered by people due to their protected characteristic
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people including steps to take account of disabled people’s disabilities *and*
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low

NB Please note that, for disabled persons, the Council must have regard to the possible need for steps that amount to positive discrimination, to “level the playing field” with non-disabled persons, e.g. in accessing services through dedicated car parking spaces.

## Fostering good relations

Fostering good relations involves having due regard, in particular, to the need to tackle prejudice and promote understanding.

## Protected Characteristics

Protected Characteristics defined in the Act are age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex and sexual orientation. Marriage and civil partnership are also a protected characteristic for the first equality aim to eliminate discrimination.

## Guidance on compliance with the PSED for officers and decision makers

To comply with the duty, the Council must have “due regard” to the three equality aims. This means the PSED must be considered as a relevant factor in a decision alongside other relevant matters such as budgetary, legal, economic and practical implications. What regard is “due” will depend on the circumstances of each proposal and importance of equalities to the decision being taken. Some key principles for compliance during the decision-making process are set out below:

1. The duty is mandatory and important and must be met by the decision-maker and not delegated.
2. EAs must be evidence based and accurate – negative impacts must be fully and frankly identified so the decision-maker can fully consider their impact.
3. There must be an assessment of the practical impact of decisions on equalities, measures to avoid or mitigate negative impact and their effectiveness.
4. There must be compliance with the duty when proposals are being formulated by officers and then by members or officers when taking the decision: the Council cannot rely on an EA produced after the decision is made but sometimes a “provisional” EA is appropriate e.g. before consultation on a proposal.
5. Officers and members making a decision where there is an equality impact must give conscious and open-minded consideration to the impact of the duty on the decision, e.g. be prepared to change or amend a decision although negative equalities impacts does not stop a decision being made (see 7).
6. The duty is **not**, however, to achieve the three equality aims but to take them into account when making the final decision – therefore, **the duty does not stop difficult but justifiable decisions being made.**
7. The decision maker may take into account countervailing (i.e. opposing) factors that may objectively justify taking a decision which has negative impact on equalities, e.g. financial targets, value for money or service needs.
8. The duty is ongoing: EAs should be reviewed over time and there should be evidence of how impact will be monitored after the decision.
9. The above is a general guide to this changing area of law. You should also refer to the Council’s EA Page <http://forestnet.lbwf.gov.uk/index/residents-first/equalities/equality-analysis.htm> for more detailed guidance, and specific advice from the Council’s Equalities Lead should be sought on complex issues.

## What to do if your proposal is scheduled for Cabinet/Committee?

## The Proposals

The Parking Services Department is proposing changes to the borough's parking ecosystem through extended and aligned Pay to Park (P2P) restrictions. This proposal aims to create a more efficient, consistent, and user-friendly parking experience for residents and visitors.

There are currently eight various restriction periods in the Borough, depending on location. Around 70% of the current locations operate from 10am-1pm and 2pm-4pm, and around 90% include a one-hour free period (1pm-2pm). All locations have 15 minutes free parking allowed during restricted hours for any customers.

Currently, the borough faces several challenges with its P2P restrictions:

- **Active Travel:** LBWF is an active travel Borough and have declared a climate emergency – the high level of free parking available throughout the day actively encourages vehicle use, something which the council actively discourages through our parking service products and services.
- **Inconsistent Enforcement:** With eight different P2P variations of hours across the borough, confusion arises for residents and visitors. This inconsistency makes enforcement difficult and inefficient.
- **Limited Hours:** Most existing P2P restrictions are only enforced weekdays from 10am to 2pm and 4pm to 6pm. This limited window fails to address peak parking demand, especially on evenings and weekends.
- **Free Parking limiting turnround and making enforcement difficult:** The 1-hour free parking is a challenge to enforce as well as limiting turnover of vehicles.

To address these challenges, we propose the following changes:

- **Standardisation:** Implement uniform P2P hours throughout the borough. This will simplify enforcement and make it easier for everyone to understand the parking regulations.
- **Extended Hours:** We propose a new standard enforcement period of Monday to Sunday, from 8am to 6:30pm. This extended window better reflects peak parking usage throughout the week.
- **Removal of 1-hour free parking in P2P bays:** The removal of these free time limits will allow greater turnover of vehicles and allow more efficient and consistent enforcement. It could also aid businesses by creating more consistent turnover of vehicles outside their shops.
- **15-minute free parking time:** We are proposing to remove the 15-minute free parking period for all drivers.

Standardised and extended P2P restrictions could offer a range of potential benefits for the Borough:

- **Improved Parking Availability:** Consistent and extended P2P hours will deter long-term parking and encourage turnover, leading to a more readily available parking supply.
- **Reduced Traffic Congestion:** Removing the incentive of free parking during peak travel hours and encouraging alternative transportation options could result in improved traffic flow, reduced congestion, and reduced emissions.
- **Enhanced Equity:** Standardised P2P rules ensure fair application of parking regulations across all neighbourhoods.

## **2. What are the proposals?**

To conduct a statutory consultation on the following:

- Implement uniform P2P hours throughout the borough.
- We propose a new standard enforcement period of Monday to Sunday, from 8am to 6:30pm.
- Remove the 15 minutes free parking concession.
- Remove the 1-hour free parking period in place between 1pm-2pm.

This is an initial draft of the EqIA which will be updated following the consultation, to incorporate its findings.

### **3. Who is affected by the Proposal?** *Identify the main groups most likely to be affected by the recommendations, directly and indirectly.*

This proposal for standardised and extended P2P restrictions has the potential to affect multiple distinct groups directly and indirectly within the borough. Everyone who uses Waltham Forest's streets is affected by parking issues even if they do not use or own a car. Parking strategy is more than allocating and managing on-street and off-street space; it plays a critical role in enabling the safe and efficient movement of people and providing an attractive street environment for everyone. Parking services are utilised by users of all age, race, faith, sex, sexual orientation, disability and those that potentially have other disadvantaging factor. A breakdown of the main groups and how they might be impacted is listed below:

#### **Directly Affected**

- **Residents of Car Free Developments (within CPZs) with Cars** This group may be directly impacted by the extended hours of P2P enforcement. They will need to factor in the cost of P2P when parking on the street during the proposed hours (Monday-Sunday, 8am-6:30pm). This may lead to:
  - Increased P2P costs: Residents who rely on free street parking regularly may experience an increase in parking expenses if they choose to use P2P bays.
- **Businesses:** Businesses that rely on customer foot traffic may be affected in the following ways:
  - Greater availability of bays could benefit businesses by creating more consistent turnover of vehicles outside their establishments, which could in turn lead to an increase in customers.
- **Visitors:** Visitors unfamiliar with the borough's parking system might encounter:
  - Increased parking costs: Visitors who rely on free street parking will need to factor in P2P costs during their visit.

**Low-Income Residents:** Residents with limited financial resources may be disproportionately affected by increased P2P costs, potentially limiting their access to on-street parking.

#### **Positive Impacts:**

The proposal could potentially deliver the following positive impacts:

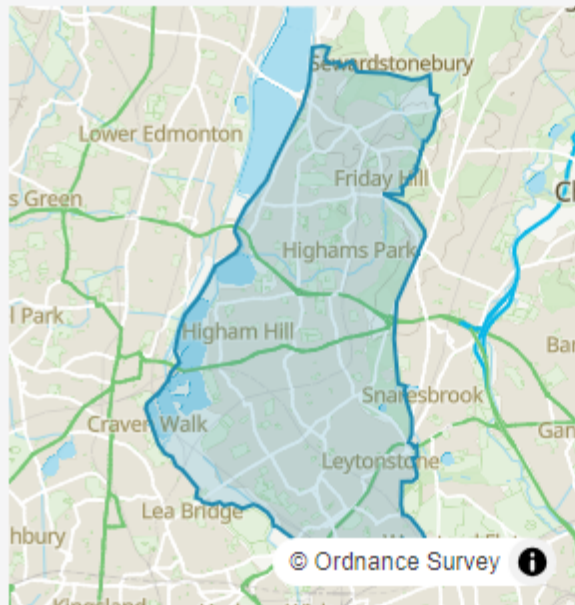
- **Improved Accessibility:** Increased parking turnover could improve overall parking availability, making it easier for everyone to find a space.
- **Reduced Congestion:** Discouraging parking during peak hours may lead to a reduction in traffic congestion.
- **Environmental Benefits:** Reduced traffic congestion can contribute to lower emissions and improved air quality.
- **Health:** By encouraging active travel, more residents and visitors might utilise healthier forms of transport (e.g., cycling) which brings health benefits
- **Businesses:** An increase in availability of parking bays may lead to increased footfall for local businesses and shops.
- **Consistency:** Aligning P2P times across the Borough would create less confusion for drivers, including visitors from neighbouring Boroughs as restriction times will broadly align.

Age *Click and hover over the questions to find more details on what is required*

**Additional Equalities Data (Service level or Corporate)** *Include data analysis of the impact of the proposals*  
According to the Census Data 2021- Waltham Forest has a population of 278,400 with approx. 10% over 65.

## Waltham Forest

### Area map



### Population

**278,400**

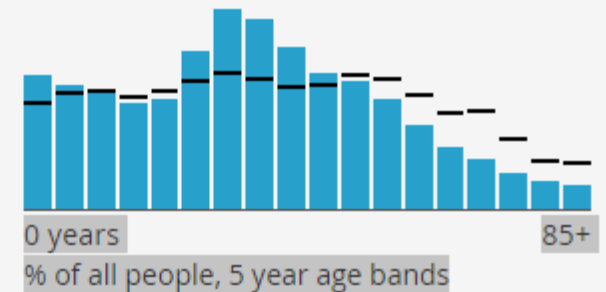
people

**56,490,000** people in England

Rounded to the nearest 100 people

### Age profile

Waltham Forest (England)



Source: Office for National Statistics - Census 2021

**Age** *Click and hover over the questions to find more details on what is required*

**What is the proposal's impact on the equalities aims?** *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

While the proposal affects all age groups, there's a potential for disproportionate impact on older adults due to:

**Limited Income:** Older adults on fixed incomes or pensions may find it more challenging to afford additional P2P costs, potentially limiting their access to on-street parking.

**Indirect Impact**

The proposal can also have indirect impacts on older adults:

**Reduced Socialisation:** Increased parking hours could lead older adults to limit car usage, potentially impacting their ability to visit friends and family or participate in social activities.

**Limited Access to Services:** If the proposal discourages car usage, older adults who use their cars to access essential services could face difficulties.

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

The Freedom Pass continues to be available to Londoners aged over 60 providing access to free travel every day after 9.30 on most public transport and we will continue to publicise and signpost eligible residents to apply.

Households within a CPZ where one or more residents are aged 60 and over will continue to be entitled to 90 hours of visitor permits for free. We will continue to give free permits to carers in receipt of DWP Carers Allowance.

The consultation will identify any further impacts on the protected characteristic of age, which can be used to develop any necessary mitigations.



Disability

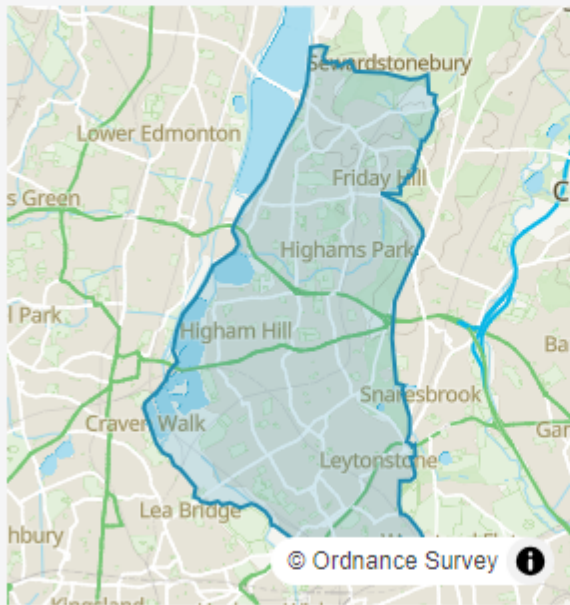
**Additional Equalities Data (Service level or Corporate)** Include data analysis of the impact of the proposals

According to the Census Data 2021- Waltham Forest has a population of 278,400 with approx. 13.2% disabled under the Equality Act.

Profile preview

Waltham Forest

Area map



Population

**278,400**

people

**56,490,000** people in England

Rounded to the nearest 100 people

Disability

■ Waltham Forest | (England)

Disabled under the Equality Act  
**13.2%** (17.3%)



Not disabled under the Equality Act  
**86.8%** (82.7%)



% of all people

Source: Office for National Statistics - Census 2021

## Disability

**What is the proposal's impact on the equalities aims?** Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact**

Increased parking availability due to reduced long-term parking could benefit people with disabilities who may need more time to park or require accessible parking spaces closer to their destination.

Improved traffic flow, if achieved, could lead to shorter travel times, benefiting those who rely on accessible transportation services.

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

Holders of blue badges can already park for free in all P2P bays across the borough, as a result there will be no impact from extending the hours.

In addition, blue badge holders who drive themselves and need to park as close to their property as possible will continue to be able to apply for a discretionary disabled parking bay.

The consultation will identify any further impacts on the protected characteristic of disability, which can be used to develop any necessary mitigations.

## Pregnancy and Maternity

Check box if NOT applicable

### Pregnancy and Maternity

**Additional Equalities Data (Service level or Corporate)** Include data analysis of the impact of the proposals.

**What is the proposal's impact on the equalities aims?** Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact**

We envisage no negative impacts on pregnant residents at this stage; however the consultation will help to identify any impacts, which can be used to develop any necessary mitigations.

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

## Race

Check box if NOT applicable

### Race

**Additional Equalities Data (Service level or Corporate)** Include data analysis of the impact of the proposals

**What is the proposal's impact on the equalities aims?** Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact**

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

## Race

We envisage no negative impacts on residents based on race at this stage; however the consultation will help to identify any impacts, which can be used to develop any necessary mitigations.

## Religion or Belief

Check box if NOT applicable

### Religion or Belief

**Additional Equalities Data (Service level or Corporate)** *Include data analysis of the impact of the proposals*

**What is the proposal's impact on the equalities aims?** *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

**Services/Worship:** Some faiths may have services or periods of worship that may coincide with the proposed P2P increased hours. Where they may have previously been able to park for free whilst attending their place of worship, they may now need to make payment or have reduced free parking time.

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

**Liaison with religious organisations:** The council could establish communication channels with local places of worship and ensure that organisations are proactively encouraged to use public transport and other forms of active and sustainable travel.

Not only is this a solution to any parking challenges, it also aligns with LBWF being an active travel Borough as well as our declared climate emergency.

There are multiple 30-minute free bays around the Borough which will remain in place and can be freely used by attendees.

Attendees holding valid Blue Badges are unaffected by these changes.

In addition, parking restrictions are, on request, relaxed at religious events and funerals.

The consultation will identify any further impacts on the protected characteristic of religion / belief, which can be used to develop any necessary mitigations.

## Sex

**Additional Equalities Data (Service level or Corporate)** *Include data analysis of the impact of the proposals*

**What is the proposal's impact on the equalities aims?** *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

We envisage no negative impact on residents based on their Sex at this stage; however the consultation will help to identify any impacts, which can be used to develop any necessary mitigations.

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

## Sexual Orientation and Gender Reassignment

### Sexual Orientation and Gender Reassignment

**Additional Equalities Data (Service level or Corporate)** *Include data analysis of the impact of the proposals*

**What is the proposal's impact on the equalities aims?** *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

We envisage no negative impact on residents based on sexual orientation or gender reassignment at this stage; however the consultation will help to identify any impacts, which can be used to develop any necessary mitigations.

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

## Marriage and Civil Partnership

### Marriage and Civil Partnership

**Additional Equalities Data (Service level or Corporate)** *Include data analysis of the impact of the proposals*

## Marriage and Civil Partnership

**What is the proposal's impact on the equalities aims?** Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact**

We envisage no negative impact on residents based on marriage and civil partnership status at this stage; however the consultation will help to identify any impacts, which can be used to develop any necessary mitigations.

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

### Additional Impacts on Advancing Equality & Fostering Good Relations

Check box if NOT applicable

See pages 1 and 2 for full details of these two aims. This section seeks to identify what additional steps can be taken to promote these aims or to mitigate any adverse impact. Analysis should be based on the data you have collected above for the 8 protected characteristics covered by these aims. Remember, marriage and civil partnership is not covered.

**Key borough statistics:** According to the **Resident Insight Survey** (wave 13 conducted in Feb-Mar 2016), 77% of Waltham Forest residents feel that their local area is a place where people from different backgrounds get on well together.

Women are more likely than men to feel that people from different backgrounds are getting on well locally (81% compare to 74%). Young people aged 16-29 are most likely to feel people are getting on well (84%), while older residents aged 65+ are least likely to think so (66%). BME residents are more likely to think that people from different background are getting on well in their local area than White residents (83% compared to 74%), which is likely related to the different age profile of the BME and White populations.

**The Living Together Survey** from Dec 2015-Feb 2016 found that 62% of residents agreed that they have the opportunity to mix with people from different backgrounds to themselves. One fifth (20%) feel they do not really mix with people from different backgrounds. People in the north of the borough (Chingford) are least likely to feel they have opportunity to mix with people from different backgrounds to themselves (55% compared to 68% in Leytonstone, 63% in Walthamstow and 61% in Leyton). Younger and BME residents are more likely to mix with people from different background than older residents and those of White background. The survey also found that not enough mixing between people of different backgrounds and lack of understanding of each other are perceived to be the two main reasons which can stop people from getting on together.

Note: These statistics provide general data for this protected characteristic. You need to ensure you have sufficient information about those affected by the proposals.

For more detailed breakdowns or further information please contact Insight and Performance Team (ed.maguire@walthamsforest.gov.uk, ext. 4855).

### Additional Impacts on Advancing Equality & Fostering Good Relations

#### Additional Equalities Data (Service level or Corporate)

## Additional Impacts on Advancing Equality & Fostering Good Relations

**Are there any additional benefits or risks of the proposals on advancing equality and fostering good relations not considered above?**

**What actions can be taken to avoid or mitigate any negative impact on advancing equality or fostering good relations not considered above?** Provide details of how effective the mitigation will be and how it will be monitored.

We envisage no negative impact overall

## Conclusion

*Consider the Guidance below and set out your conclusions from the equalities analysis of the 8 protected characteristics. If there are negative equalities impacts, but you think that the proposals should still proceed in the current or amended form, explain what the objective justification for this is, providing evidence as*

*appropriate. If it is helpful, refer to other documents e.g. the Cabinet report. You may find it helpful to identify one of the 4 outcomes below as being closest to your current proposals. (Use your conclusions as a basis for the “Equalities Implications” in the Cabinet report.)*

### **This analysis has concluded that...**

It is recognised that any increase to charges is likely to have an impact on some residents and visitors, however, the proposal has built in several commitments that will mitigate or minimise the impact on some of those with protected equality characteristics. The outcome of the analysis is in line with Outcome 2 below.

Consultation on the adjusted scheme is recommended to go ahead which will allow mitigative actions to be devised for any unforeseen impacts on protected groups and for any necessary improvements or changes to be planned for the scheme before a final decision is made on whether to implement it or not .

As part of the consultation we will consult with targeted community groups and charities, such as Age UK, relevant local religious and faith groups etc, to address the impacts we have already identified.

This EQIA's overall owner is Parking Services, Waltham Forest Council. This EqIA will be updated following the consultation, to incorporate its findings.

### **Outcome of Analysis** *Check one that applies*

#### **Outcome 1**

No major change required when the assessment has not identified any potential for discrimination or adverse impact and all opportunities to advance equality have been taken.

#### **Outcome 3**

Continue despite having identified some potential for adverse impacts or missed opportunities to advance equality. In this case, the justification should be included in the assessment and should be in line with the duty to have ‘due regard’. For the most important relevant policies, compelling reasons will be needed. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact.

#### **Outcome 2**

Adjustments to remove barriers identified by the assessment or to better advance equality. Are you satisfied that the proposed adjustments will remove the barriers identified?

#### **Outcome 4**

Stop and rethink when an assessment shows actual or potential unlawful discrimination.

Signed off by Head of Service:



Name:

Dieter Hering

Date:

26/07/2024