

## Emission Based Charging Equalities Assessment (November 2020)

### Equality Analysis



Please refer to the guidance for carrying out Equality Assessments is available on the intranet

What are the proposals being assessed?

Emission based charging for Permits and paid for parking on and off street.

To help deliver key strategic council priorities including public health, air quality, climate change and sustainable and active transport.

This assessment considers:

The effect of an emission-based charging model and the decrease or increase in permit and parking changes for some residents/motorists.

The proposal retains key elements of the existing parking charge model introduced in January 2020, which is based on accessibility to public transport and length of time a controlled parking zone is enforced. The proposal builds on and strengthens this model by introducing two additional elements that specifically target the emissions that contribute towards climate change and air pollution.

The proposals introduce different charging bands for CO2 emissions which are based on the principles and categories of 'the Government Vehicle Excise Duty (VED)'. The car tax bandings range from A to M, with category 'A' being for the least polluting vehicles and M the highest. VED was introduced by the government to move vehicle owners away from higher CO2 polluting vehicles and is familiar to motorists.

	<p>As part of Merton's continued commitment to addressing local pollution it is proposed to replace the existing Diesel Levy surcharge that was introduced in 2017 with one that is based on the TfL ULEZ zone charging model. Many Merton residents may be affected by the proposed ULEZ extension in October 2021, if they need to travel into this area, so aligning our charges with the TfL model will reinforce and simplify the vehicular requirements residents will need to meet to avoid both charges.</p> <p>The ULEZ model is based on Euro vehicle emissions standards that set limits for air polluting nitrogen oxides (NOx) and particulate matter (PM) from engines. This is considered to be a fairer model than the previous blanket surcharge for all diesels and some newer, cleaner diesels will be excluded from the charge whilst some older, dirtier petrol vehicles are now included. It is proposed that the same annual rate of £150 will apply.</p> <p>The Government is currently in the process of developing a call for evidence on VED with a view to amending the current charging system. Merton's proposals stand alone and are not dependent on any revised Government scheme. However, it may be prudent for the Council to ensure that the scheme remains aligned with any changes to the Government scheme.</p> <p>This assessment considers the payment methods/choices at locations where a machine is no longer an alternative and payment options in respect of the new machines and the impact for card payments.</p>
	<p>Scratch cards for visitor permits are currently sold to allow parking within Permit Zones when guests visit. These cannot be linked to specific vehicles which is required in an emission based charging model. The potential removal of this service in the medium term is being considered with an online vehicle specific option which is now available.</p>
Which Department/ Division has the responsibility for this?	Parking Services, Environment and Regeneration

<b>Stage 1: Overview</b>	
Name and job title of lead officer	Ben Stephens, Head of Parking
1. What are the aims, objectives and desired outcomes of your proposal? (Also explain proposals e.g. reduction/removal of service, deletion of posts, changing criteria etc.)	<p>Merton wishes to ensure that the highest priority is given, to its responsibilities to deliver cleaner local air at a time when the current situation has been described as a global public health emergency. We are delivering a new Air Quality Action Plan that is ambitious in its aims and already demonstrates that we as an authority will use all of the powers available to us, not only to challenge and tackle this problem; but also to work towards delivering our legal responsibilities to protect the public.</p> <p>The council recognises the part that it has to play, in developing and delivering a framework to tackle air quality, demand for parking, and congestion in the borough. It does not stand alone on these issues. All of the other London boroughs are seeking to implement new parking policies to tackle similar problems</p> <p>Following the parking charges implementation, the next stage of the parking policy development was to review the diesel levy, which in turn has led to an emission based charging approach.</p> <p>It should be noted that Merton declared a Climate emergency in the summer of 2019, and this has had an impact on all of the councils policies.</p> <p>One of which is Merton has set an ambitious target to achieve net-zero carbon emissions by 2030. The use of petrol and diesel vehicles in the borough makes up 19% of Merton's greenhouse gas inventory, as a result of the 600 million kilometres driven in Merton each year. Cars produce more carbon emissions than all other modes of transport put together. Emissions from buses, heavy goods and light goods vehicles also generate significant emissions.</p> <p>There are 77,000 vehicles registered in Merton, only 1,000 of which are ultra-low emission. By 2050, all residents, businesses and organisations in Merton must stop using petrol and diesel vehicles, in favour of walking, cycling or using public transport. Where vehicles are necessary, these will need to be replaced by low-carbon alternatives.</p> <p>The on/off street emissions based charge aims to reduce the number of highly polluting cars owned within the borough.</p>

	<p>There are very few direct levers available to stimulate a change in driver behaviour, and the council believes that the rationale for setting the new parking charges is about giving people the right nudge and opportunity to make different choices.</p> <p>Members are requested to exercise their statutory duty to secure the expeditious, convenient and safe movement of traffic, and the provision of suitable and adequate parking facilities in the context of the public health agenda. This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p>This proposal sets out the rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.</p> <p>They explain the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by '<i>making the healthy choice the easy choice</i>'.</p>
<p>2. How does this contribute to the council's corporate priorities?</p>	<p>It contributes in the following ways:</p> <ol style="list-style-type: none"> <li>1. Reduce congestion</li> <li>2. Improve air quality and meet EU quality standards</li> <li>3. To meet the actions set out in the Merton Health and Wellbeing Strategy 2019</li> <li>4. Adopt a healthy street approach</li> <li>5. Promote healthier life styles and encourage more active travel</li> </ol> <p>Healthy places: The 'healthy streets' approach defines a healthy street as one with: things to see and do; places to stop and rest; shade and shelter; clean air; and pedestrians from all walks of life. It must be easy to cross; and feel safe, relaxing and not too noisy. Put simply, it needs to be an environment in which people choose to walk and cycle. Action against these indicators ultimately improves health, and parking policy has a role to play for example, by helping improve air quality, and incentivising people to walk, cycle and use public transport.</p>

### Merton Air Quality Action Plan 2018-2023

Merton's Air Quality Action Plan 2018-2023 strongly supported by Members is a key policy document, which clearly sets out the links between vehicle use and air quality in the Borough. Air pollution is recognised, as a major contributor to poor health with more than 9000 premature deaths attributed to poor air quality in London Air pollution is associated with a number of adverse health impacts: it is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality are often less affluent.

Air quality has been identified as a priority both nationally and within London, where pollution levels continue to exceed both EU limit values and UK air quality standards. Pollution concentrations in Merton have historically and continue to breach the legally binding air quality limits for both Nitrogen Dioxide (NO<sub>2</sub>) and Particulate Matter (PM<sub>10</sub>). The air quality-monitoring network run by Merton has shown that the UK annual mean NO<sub>2</sub> objective (40µg/m<sup>3</sup>) continues to be breached at a number of locations across the borough. In some locations the NO<sub>2</sub> concentration is also in excess of the UK 1-hour air quality objective (60µg/m<sup>3</sup>) which indicates a risk not only to people living in that area but also for those working or visiting the area.

In Merton an Air Quality Management Area (AQMA) has been declared for the whole borough. The AQMA has been declared for the following pollutants: Nitrogen Dioxide: we are failing to meet the EU annual average limit for this pollutant at some of our monitoring stations and modelling indicates it is being breached at a number of other locations. We may also be breaching the UK 1-hour Air Quality Objective based on measured concentration for NO<sub>2</sub> being in excess of 60µg/m<sup>3</sup> at some locations within the borough. There are four focus areas in the borough. These are in the main centres of Mitcham, Morden, Raynes Park and Wimbledon.

In July 2019, Merton agreed to work towards net-zero carbon emissions from the borough by 2050 and have developed a Climate Strategy and Action Plan which was approved by the Council in November 2020.

	<p>Parking and Traffic Management</p> <p>This proposed Emissions Based Charges report sets out the important role Parking and transport policy has in managing the roads and wider travel needs of the public. Merton's policy links closely with the local Implementation Plan and the Mayors Transport Strategy, which sets out objectives in detail.</p> <p>COVID 19</p> <p>Covid 19 has presented an opportunity to embed some dramatic changes to travel behaviour and has demonstrated that when car journeys are reduced the improvements achieved can be significant. This has reinforced the need to act robustly and quickly to ensure that any changes to transport behaviour as a result of Covid do not further contribute to the transport challenges we face. Whilst public transport has been adversely affected during the pandemic this is not expected to be a permanent change and we expect public transport use to return to pre Covid levels over time during 2021.</p>
<p>3. Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc.</p>	<p>Air quality, climate change and public health affects all residents, businesses, workers and visitors to the borough, across all socio-economic groups.</p>
<p>4. Is the responsibility shared with another department, authority or organisation? If so, who are the partners and who has overall responsibility?</p>	<p>Yes. Responsibility is shared with the following departments, organisations and partners. Public Health, NHS, Future Merton, Highways and Transportation, Planning, Mayor of London, TfL, transport operators, Parking Services and Environmental Health.</p>

**Stage 2: Collecting evidence/ data**

**5. What evidence have you considered as part of this assessment?**

Provide details of the information you have reviewed to determine the impact your proposal would have on the protected characteristics (equality groups).

The Council have assessed the use of public transport and active transport and alternatives to owning a vehicle. Specifically, diesel and petrol vehicles contribute significantly to poor air quality. There are also other vehicle types such as electric or hybrid which are cleaner alternatives.

A number of previous reports have been presented with regard to the development of the emissions based parking charge – a strategic approach. Links to all previous relevant reports are included in the main document.

Key factors considered included:

- (i) Air Quality hotspots
- (ii) Areas of high congestion
- (iii) Ease of Access to public transport(iv) Enforcement requirements

Merton is committed to undertaking comprehensive consultation to gain the views of residents and stakeholders. This enables the Council to make informed decisions and to develop our policies.

**Merton's profile**

Merton has a diverse and growing population. In 2018, Merton has an estimated resident population of 209,400, which is projected to increase by about 3.9% to 217,500 by 2025. The age profile is predicted to shift over this time, with notable growth in the proportions of older people (65 years and older) and a decline in the 0-4 year old population.

Age	Percentage of total population
0-4	7.4%
5-17	15.7%

18-64	64.5%
65-84	10.7%
85+	1.7%

Source: GLA Housing led projection, data from 2016 SHLAA

#### Sex

Age	Female	Male
0-4	106,045 (51%)	103,370 (49%)
5-17	16,077 (49%)	16,733 (51%)
18-64	68,266 (50.5%)	66,914 (49.5%)
65-84	11,840 (53%)	10,500 (47%)
85+	2,287 (63%)	1,343 (37%)

Source: The 9 Protected Characteristics, Merton. Available from:

<https://www2.merton.gov.uk/9%20PC%20July%202018%20Final.pdf>

In 2018, east Merton has an estimated resident population of 110,200 which is projected to increase to 113,900 by 2025 (a 3.3% increase) compared to west Merton, which has an estimated resident population of 99,200 which is projected to increase to 103,600 by 2025 (a 4.5% increase). East Merton generally has a larger younger population of 0-29 year olds compared to west Merton, which generally has a larger population of people, aged 35 and over.

In 2018, Merton has an estimated 135,200 working age population (18-64 year olds), which make up 64.5% of the total population. By 2025 this is predicted to increase in numbers to almost 140,000 (although decrease slightly as a proportion of the total population, to 64.3%). Almost 72,000 of this age group currently reside in east Merton compared to 63,200 in west Merton. There is expected to be an increase by 2025 to 73,800 in east Merton and 66,200 in west Merton.

Merton has 22,350 people aged 65-84 years old (10.7% of the total population). By 2025, this is predicted to increase to 24,350 (11.2%). 10,350 live in east Merton compared to 12,000 in west Merton. By 2025 there is expected to be an increase to 11,550 in east Merton and almost 12,800 in west Merton.

Merton has a diverse population and this is demonstrated in the following table;



	Merton		London	
	Count	%	Count	%
Arab	1,275	0.6	146,572	1.6
Bangladeshi	2,392	1.1	263,556	2.9
Black African	9,964	4.7	669,217	7.3
Black Caribbean	7,812	3.7	346,086	3.8
Chinese	2,952	1.4	158,737	1.7
Indian	8,905	4.2	654,653	7.1
Other Asian	19,364	9.1	518,236	5.6
Other Black	1,939	0.9	214,057	2.3
Other Ethnic Group	2,817	1.3	224,729	2.4
Other Mixed	3,611	1.7	167,217	1.8
Other White	40,963	19.3	1,457,978	15.8
Pakistani	9,626	4.5	281,377	3.1
White & Asian	3,265	1.5	132,736	1.4
White & Black African	1,439	0.7	86,605	0.9

White & Black Caribbean	3,031	1.4	141,984	1.5
White - British	88,824	41.8	3,552,634	38.6
White - Irish	4,481	2.1	186,955	2
Total	212,660		9,203,329	
Total excl British white	123,836	58%	5,650,695	61%

Research has shown that poor air quality is more likely to adversely affect those from BAME backgrounds.

Merton along with most London Boroughs is currently failing its annual legal air quality targets for both NO<sub>2</sub> and Particulates (PMs); this problem is most severe around the major transport routes. There is emerging evidence that schools in London which are worst affected by air pollution are in the most deprived areas, meaning that poor children and their families are exposed to multiple health risks.

### **Equality Assessment – Steps taken**

The councils' consultation website and the emails sent to the relevant equality groups all included hyperlinks to the consultation web pages, and details on how to make further representations.

The EIA sets out the overarching aims objectives and desired outcome of the proposal and their contribution to the council's corporate priorities. It also includes a detailed background on who will be effected by this proposal and the evidence the council has considered as part of its assessment. The council believes that in accordance with the equality assessment guidance, the wide ranging consultation process, the above referenced/linked documentation, and the recent consultation with equality groups, that the council has met its requirement to: -

- Draw up a list of areas of concern. Review ways to remove or minimise negative impact/discrimination

- Consult appropriate stakeholders as part of the review
- Formulated an action plan to tackle issues arising from the EA.
- Has provided a commitment to keep the EA monitored and agreed by the Director of Environment and Regeneration and the Head of Parking
- A copy of the outcome of the EA will be published on the councils' website.
- The EA Plan will be reviewed in 12 months' time, notwithstanding this, it should be noted that if approved, the policy would be kept under review and representatives of the affected groups would be consulted with to assess ongoing impact and consider further mitigation. Adjustments would be brought forward for Members' consideration as appropriate.

### Equality Groups

On the matter of directly consulting with equality groups, the list below shows the organisations that were directly contacted at the start of the consultation in September 2020 seeking their views.

In addition, a details of the consultation were also sent to Merton Voluntary Service Council (MVSC) who in themselves have direct links to over 800 voluntary groups and organisations in Merton.

Invites to a briefing webinar were also sent to all of these equality groups on 22 September 2020. The webinar was held on 24 September 2020 with representatives from Morden Islamic Community Centre, BAME and Merton Senior Forum attending. A second webinar was held for Merton CAB on 8 October as they were unable to attend the 24 September webinar.

A series of follow up telephone calls were made to equality groups that had not responded to the consultation email they were sent.

A summary of the issues raised by Equality Groups are given below.

### **BAME voice & Merton Seniors Forum**

A representative from BAME and Merton Seniors Forum attended the webinar on 24 September 2020.

Following the webinar, BAME Voice emailed the following comments/concerns to the consultations email address;

- unemployed and unable to pay or change their vehicle
- those with bad emission cars
- HGV vehicles parked in residential streets.
- free parking bays and residential parking bays

- How will Merton assess vehicles for emissions?What about supermarket car parks?
- Need to ensure wide coverage of proposal

The Councils response;

The purpose of this proposal is to encourage our residents to look to move to cleaner, and more sustainable forms of travel, while at the same time improving the air quality levels across the borough. There are running costs associated with any vehicle, irrespective of whether or not it is driven, or remains constantly parked, with the cost of a permit being one of those running costs.

There is a borough wide overnight parking ban for all vehicles exceeding 7.5T, and residents can report these vehicles by calling parking services on 020 8545 4661, and selecting the option to report an illegally parked vehicle. These vehicles are permitted to stop to load and unload, subject to local and national parking restrictions.

The emissions charges will not apply to free parking locations.

The emissions charges will apply to car parks managed by the London Borough of Merton that serve super markets i.e. Peel House Car Park, Hartfield Road Car Park, St Marks Car Park and Coombe Lane Car Park. The emissions charges will not apply to privately managed car parks (supermarket car parks for example).

The emissions charges will apply to all types of permits, except carer's permits, that can be used in resident parking bays.

Motorists are required to park their vehicle legally at all times, and if they do not pay the appropriate charge to park at a parking location, they can be issued with a Penalty Charge Notice (PCN) for doing so.

When applying for an emissions based permit, the customer will enter their vehicle registration into the system, and the permit system will use that to look up the vehicle emissions for that vehicle on the Gov.uk. Website. The permit cost to the customer will be determined by the emission levels listed there.

**Merton CAB**

Merton CAB were unable to attend the 24 September webinar, but attended a webinar on 8 October 2020. The issues raised by the Merton CAB representative were as follows;

Access to Smart phone and/or bank account to book/pay for parking via RingGo.

Concerns about the impact on Socio-economic groups as finance issues are a high concern in Merton and often the basis for visits to CAB.

Concerned as well re the impact on the disabled within Merton

The council's response;

While the majority of motorists already have access to smart phones and a bank account to pay for parking via RingGo. The council will take into consideration the need to allow payment options when upgrading the P&D machine infrastructure in addition a vehicle emissions check based on the vehicle registration, to ensure that they are charged the correct rate.

The purpose of these proposed charges is to encourage motorists to give consideration to how they use their cars, when to use them, and where possible, to use other forms of active and sustainable transport. Studies show that because of the running costs associated with vehicle ownership, those in the socio-economic group most likely to be affected by these charges are less likely to own a vehicle, and more likely to be using active and sustainable forms of transport to meet their daily needs.

These proposed charges will not impact on Blue Badge holders as they will still be permitted to park for free on and off street, and blue badge holders will continue to receive the free carer's permit that can be used by those visiting them for their care needs.

**Merton CIL**

Merton CIL replied to comment that as these proposals do not impact on Blue Badge holders, they do not feel a need to comment.

**Merton Seniors Forum**

The BAME Voice representative attended the webinar on 24 September 2020 on behalf of BAME Voice and Merton Seniors Forum. Please see above comments under BAME Voice.

**Merton Vision**

Merton Vision completed the online survey but did not make any further comments.

**Merton Carer Support**

Merton Carer Support confirmed that they had passed details of the consultation to their members

### **Polish Family Organisation**

The Polish Family Organisation completed the consultation survey, but did not make any further comments.

### **Shree Ganapathy Temple**

On 27 October 2020, an email was received from the Shree Ganapathy Temple, asking for further time to reply to the consultation.

The next day, we gave them until 2 November 2020 to send us their comments.

No further communications were received.

### **Morden Islamic Community Centre**

A representative attended the 24 September 2020 webinar on behalf of Morden Islamic Community Centre, and following the webinar, asked the following questions;

- How will this proposal effect pay and display machines?
- Will the free bays surrounding Morden be affected?
- Are the car parks in Merton affected?
- How does it impact on the low traffic scheme?
- Will the free parking in Morden be affected?

The Councils response is as follows;

Parking Services are currently looking to upgrade existing pay and display machines in key locations so that they will be able to do vehicle emissions look up checks, and charge motorists the correct price for parking, according to the agreed emission based prices.

The free, short stay parking bays surrounding the Centre are on the Red Route and are the responsibility of Transport for London (TfL). These proposals will not affect those bays.

Emissions based charges, subject to the outcome of this consultation, will be applicable to all council managed off street car parks.

This is a separate project to the low traffic schemes.

There are not currently plans to alter the hours of operations of the Controlled Parking Zones (CPZ), or town centre car parks in Morden Town Centre.

The Council will be keen to work with equality groups in the future monitor the effects of its new policy.

**No direct response was received from the following organisations**

The Wimbledon Guild, Age UK Merton, Ethnic Minority Centre, Mitcham and Morden Guild, Merton Mencap, Wimbledon and District NCT Group, Southwest London Tamil Welfare Group, West Indian Friends and Family Association, Wimbledon Mosque and RHEMA Church Ministries.

**Stage 3: Assessing impact and analysis**

**6. From the evidence you have considered, what areas of concern have you identified regarding the potential negative and positive impact on one or more protected characteristics (equality groups)?**

Protected characteristic (equality group)	Tick which applies		Tick which applies		Reason Briefly explain what positive or negative impact has been identified
	Positive impact		Potential negative impact		
	Yes	No	Yes	No	
Age	X		X		<p><b>Positive Impact</b></p> <p>The proposals support the previous rationale of introducing PTAL charging to adjust driver behaviour and to ensure that we can provide a modern, efficient</p>

				<p>and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.</p> <p>The proposals support the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by 'making the healthy choice the easy choice'.</p> <p>In setting out its measures of success, the Emission Based Charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets - to benefit residents and businesses alike.</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p><b>Negative Impact</b></p> <p>Any increase in parking charges has the potential to negatively impact on those who are older and are more likely to have physical and health conditions. Older people are more likely to be affected by social isolation and loneliness.</p> <p>There may be a number of residents (predominantly elderly) who do not own a mobile phone, and would be unable to make a payment via RingGo in locations where there is not an upgraded machine to make a payment at the appropriate rate for their vehicle.</p> <p>However, smart phone usage is currently at 80% of the adult population aged 65 or over.</p>
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				<p>Elderly motorists are less likely to be able to move to more active forms of transport and more reliant on personal vehicles, while at the same time, being less likely to be in a position to exchange their current vehicle for a more environmentally friendly car. As a direct result of this, some elderly motorists with older, more polluting vehicles will also face increased resident parking permit costs. In the current climate, elderly motorists are more likely to retain their vehicle as a result of current concerns of travelling on public transport.</p> <p><b>Transition to cashless payments</b></p> <p>If the emissions based charges are agreed, the on and off street pay and display machines will need to be reviewed, to ensure that there is minimal adverse impact.</p> <p><b>Positive impact</b></p> <p>Ease of access via phone and mobile phone</p> <p>No need for cash – convenience</p> <p>There are no changes to concessions for Blue Badge Holders</p> <p><b>Negative impact</b></p> <p>There may be a number of residents (predominantly elderly) who do not own a mobile phone, and would be unable to make a payment.</p> <p>However, Smart phone usage is currently at 90% of the adult population, however smart phone usage by those aged 65 or over is at 80%.</p> <p><b>Visitor Scratch cards</b></p> <p>Visitor scratch cards are paper, non-vehicle specific, permits valid for a full day or half days parking within a CPZ, and are given by residents to friends, relatives and tradespeople visiting their address, and currently these permits are purchased in advance and consequently cannot be sold in a way that would reflect the appropriate cost for each vehicles emissions. It will be necessary for</p>
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					<p>these permits to be priced so that they reflect the maximum charge that could be payable. <b>Positive impact</b></p> <p>Improved Air quality</p> <p>Better mental and physical health outcomes</p> <p><b>Negative Impact</b></p> <p>In the first instance, those who are unable to book e-visitor vouchers via a smartphone app, and purchase scratchcards will potentially pay more for each visitor session, than they would if they could book the parking session through the cashless parking app. However, smart phone usage is currently at 80% of the adult population aged 65 or over.</p>
<b>Disability</b>	X			X	<p><b>Positive Impact</b></p> <p>The proposals support the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.</p> <p>The proposals support the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by 'making the healthy choice the easy choice'.</p> <p>In setting out its measures of success, the Emission Based Charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets - to benefit residents and businesses alike</p>

				<p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p>The recent extension of the Blue Badge scheme to those with hidden disabilities, has meant that there has been a C.15% increase in the number of applications for Blue Badges.</p> <p>This in turn means that more individuals have access to a Blue Badge, and the parking benefits that it grants the holder.</p> <p>At this time, it is not believed that emissions based charging will unduly impact on those within this group as a Blue Badge allows the holder to park for free, and without time limit in pay and display bays and permit holder bays.</p> <p>In addition, a free carer's permit is also issued to Blue Badge holders, and this permit can be used by visitors, carers and friends or family, to visit the Resident to meet their social and care needs.</p> <p>It is believed that these parking benefits mitigate any potential negative impact in respect of any changes to charging on street.</p> <p>Currently, Blue Badge holders are permitted to park for as long as they need to within Merton's off street parking places, providing their blue badge is on display.</p> <p><b>Negative Impact</b></p> <p>None perceived</p> <p><b>Transition to cashless payments</b></p> <p>If the emissions based charges are agreed, the on and off street pay and display machines will need to be reviewed, to ensure that there is minimal adverse impact.</p>
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				<p><b>Positive impact</b></p> <p>Ease of access via phone and mobile phone</p> <p>No need for cash – convenience</p> <p>There are no changes to concessions for Blue Badge Holders</p> <p>With a potential reduction in the number of vehicles on the road, this would mean that there would be more available parking closer to their ultimate destination for those within this group.</p> <p><b>Negative Impact</b></p> <p>None Perceived</p> <p><b>Visitor Scratchcards</b></p> <p>Visitor scratch cards are paper, non-vehicle specific, permits valid for a full day or half days parking within a CPZ, and are given by residents to friends, relatives and tradespeople visiting their address. Because these permits cannot be sold in a way that would reflect the appropriate cost for each vehicles emissions, it will be necessary for these permits to be priced so that they reflect the maximum charge that could be payable. As a result of this, consideration should be given to withdrawing these permits over time, whilst ensuring that provision is made for customers who are unable to book parking via a smart phone</p> <p><b>Positive impact</b></p> <p>Merton currently provide a free carer’s permit to blue badge holders who reside within a Controlled Parking Zone (CPZ). This is a free, annual permit that is not vehicle specific, and can be used by carers, relatives, and tradespeople visiting the Blue badge holder.</p> <p><b>Negative Impact.</b></p>
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					None perceived
<b>Gender Reassignment</b>	X			X	<p><b><u>Positive Impact</u></b></p> <p>The proposals support the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.</p> <p>The proposals support the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by 'making the healthy choice the easy choice'.</p> <p>In setting out its measures of success, the Emission Based Charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets - to benefit residents and businesses alike</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction. Improved Air Quality</p> <p>Improved physical and mental health outcomes</p> <p><b>Potential Negative Impact</b></p> <p>None identified</p> <p><b>Transition to Cashless parking</b></p>

					<p>If the emissions based charges are agreed, the on and off street pay and display machines will need to be reviewed, to ensure that there is minimal adverse impact.</p> <p><b>Positive impact</b></p> <p>Ease of access via phone and mobile phone</p> <p>No need for cash – convenience</p> <p>There are no changes to concessions for Blue Badge holders</p> <p><b>Negative Impact</b></p> <p>None Identified</p> <p><b>Visitor Scratch Cards</b></p> <p>Visitor scratch cards are paper, non-vehicle specific, permits valid for a full day or half days parking within a CPZ, and are given by residents to friends, relatives and tradespeople visiting their address. Because these permits cannot be sold in a way that would reflect the appropriate cost for each vehicles emissions, it will be necessary for these permits to be priced so that they reflect the maximum charge that could be payable. As a result of this, consideration should be given to withdrawing these permits over time, whilst ensuring that provision is made for customers who are unable to book parking via a smart phone</p> <p><b>Positive impact</b></p> <p>None identified</p> <p><b>Negative Impact</b></p> <p>None identified</p>
<b>Marriage and Civil Partnership</b>	X			X	<p><b><u>Positive Impact</u></b></p> <p>The proposals support the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.</p>

				<p>The proposals support the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by ‘making the healthy choice the easy choice’.</p> <p>In setting out its measures of success, the Emission Based Charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets - to benefit residents and businesses alike</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p>Improved Air Quality</p> <p>Improved physical and mental health outcomes</p> <p><b>Potential Negative Impact</b></p> <p>None identified</p> <p><b>Transition to Cashless parking</b></p> <p>If the emissions based charges are agreed, the on and off street pay and display machines will need to be reviewed, to ensure that there is minimal adverse impact.</p> <p><b>Positive impact</b></p> <p>Ease of access via phone and mobile phone</p> <p>No need for cash – convenience</p>
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				<p>There are no changes to concessions for Blue Badge Holders</p> <p><b>Negative Impact</b> None Identified</p> <p><b>Visitor Scratch Cards</b> Visitor scratch cards are paper, non-vehicle specific, permits valid for a full day or half days parking within a CPZ, and are given by residents to friends, relatives and tradespeople visiting their address. Because these permits cannot be sold in a way that would reflect the appropriate cost for each vehicles emissions, it will be necessary for these permits to be priced so that they reflect the maximum charge that could be payable. As a result of this, consideration should be given to withdrawing these permits over time, whilst ensuring that provision is made for customers who are unable to book parking via a smart phone</p> <p><b>Positive impact</b> None identified</p> <p><b>Negative Impact</b> None identified</p>
<b>Pregnancy and Maternity</b>	X		X	<p><b><u>Positive Impact</u></b></p> <p>The proposals support the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.</p> <p>The proposals support the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the</p>



				<p>environment is a key driver for health. It can be summarised by 'making the healthy choice the easy choice'.</p> <p>In setting out its measures of success, the Emission Based Charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets - to benefit residents and businesses alike</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p><b>Potential Negative Impact</b></p> <p>It has been identified that those within this group could potentially be negatively impacted by this as while we are trying to encourage greater use of public travel, there are still some stations that do not have step free access, and this can be difficult to access with a buggy or young children.</p> <p>In addition, those with larger families may be more dependent on a personal vehicle, and as a result of that, have to pay more for their parking.</p> <p><b>Transition to Cashless parking</b></p> <p>If the emissions based charges are agreed, the on and off street pay and display machines will need to be reviewed, to ensure that there is minimal adverse impact.</p> <p><b>Positive impact</b></p> <p>Ease of access via phone and mobile phone</p> <p>No need for cash – convenience</p> <p>There are no changes to concessions for Blue Badge Holders</p>
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					<p><b>Negative Impact</b> None Identified</p> <p><b>Visitor Scratch Cards</b> Visitor scratch cards are paper, non-vehicle specific, permits valid for a full day or half days parking within a CPZ, and are given by residents to friends, relatives and tradespeople visiting their address. Because these permits cannot be sold in a way that would reflect the appropriate cost for each vehicles emissions, it will be necessary for these permits to be priced so that they reflect the maximum charge that could be payable. As a result of this, consideration should be given to withdrawing these permits over time, whilst ensuring that provision is made for customers who are unable to book parking via a smart phone</p> <p><b>Positive impact</b> None identified</p> <p><b>Negative Impact</b> None identified</p>
<b>Race</b>	X			X	<p><b><u>Positive Impact</u></b></p> <p>The proposals support the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.</p> <p>The proposals support the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by ‘making the healthy choice the easy choice’.</p>

				<p>In setting out its measures of success, the Emission Based Charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets - to benefit residents and businesses alike.</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p>As a result of wider inequalities, some BAME residents may also be on lower incomes.</p> <p>Negative Impact</p> <p>Any increase in parking charges has the potential to negatively impact on those from certain socio economic backgrounds.</p> <p>Significant social inequalities exist within Merton. The eastern half has a younger, less affluent and more ethnically mixed population. The western half is less ethnically mixed, older and more affluent. Largely as a result, people in East Merton have worse health and shorter lives.</p> <p>In the parking charges review, it was identified that those in this group are more likely to live in areas where access to public transport is not as good as in other areas of the borough, and as a result of this, the permit charge was calculated to reflect this.</p> <p>The improvement action plan below sets out a number of mitigations to address the above points.</p> <p>The council considers that the impact is proportionate to the legitimate aim sought to be achieved through the policy.</p>
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					<p>Whereas those customers using a smartphone app to pay for their parking will be able to pay differing amounts, depending on the appropriate charge for their vehicle.</p> <p>There may be a number of residents who do not own a mobile phone, and would not be able to make a cashless payment in locations where there is not an upgraded machine to make a payment at the appropriate rate for their vehicle, however, Smart phone ownership is at approximately 96% of the adult population.</p>
Religion/ belief	X			X	<p><b><u>Positive Impact</u></b></p> <p>The proposals support the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.</p> <p>The proposals support the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by 'making the healthy choice the easy choice'.</p> <p>In setting out its measures of success, the Emission Based Charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets - to benefit residents and businesses alike</p>

				<p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p>Improved Air Quality</p> <p>Improved physical and mental health outcomes</p> <p><b>Potential Negative Impact</b></p> <p>None identified</p> <p><b>Transition to Cashless parking</b></p> <p>If the emissions based charges are agreed, the on and off street pay and display machines will need to be reviewed, to ensure that there is minimal adverse impact.</p> <p>Positive impact</p> <p>Ease of access via phone and mobile phone</p> <p>No need for cash – convenience</p> <p>There are no changes to concessions for Blue Badge Holders</p> <p><b>Negative Impact</b></p> <p><b>Visitor Scratch Cards</b></p> <p>Visitor scratch cards are paper, non-vehicle specific, permits valid for a full day or half days parking within a CPZ, and are given by residents to friends, relatives and tradespeople visiting their address. Because these permits cannot be sold in a way that would reflect the appropriate cost for each vehicles emissions, it will be necessary for these permits to be priced so that they reflect the maximum charge that could be payable. As a result of this, consideration should be given to withdrawing these permits over time, whilst ensuring that provision is made for customers who are unable to book parking via a smart phone</p>
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					<p><b>Positive impact</b> None identified</p> <p><b>Negative Impact</b> None identified</p>
<b>Sex (Gender)</b>	X			X	<p><b><u>Positive Impact</u></b></p> <p>The proposals support the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.</p> <p>The proposals support the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by 'making the healthy choice the easy choice'.</p> <p>In setting out its measures of success, the Emission Based Charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets - to benefit residents and businesses alike</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p>Improved Air Quality</p> <p>Improved physical and mental health outcomes</p>

				<p><b>Potential Negative Impact</b></p> <p>None identified</p> <p><b>Transition to Cashless parking</b></p> <p>If the emissions based charges are agreed, the on and off street pay and display machines will need to be reviewed, to ensure that there is minimal adverse impact.</p> <p>Positive impact</p> <p>Ease of access via phone and mobile phone</p> <p>No need for cash – convenience</p> <p>There are no changes to concessions for Blue Badge Holders</p> <p><b>Negative Impact</b></p> <p>None Identified</p> <p><b>Visitor Scratch Cards</b></p> <p>Visitor scratch cards are paper, non-vehicle specific, permits valid for a full day or half days parking within a CPZ, and are given by residents to friends, relatives and tradespeople visiting their address. Because these permits cannot be sold in a way that would reflect the appropriate cost for each vehicles emissions, it will be necessary for these permits to be priced so that they reflect the maximum charge that could be payable. As a result of this, consideration should be given to withdrawing these permits over time, whilst ensuring that provision is made for customers who are unable to book parking via a smart phone</p> <p><b>Positive impact</b></p> <p>None identified</p> <p><b>Negative Impact</b></p> <p>None identified</p>
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<b>Sexual orientation</b>	X			X	<p><b><u>Positive Impact</u></b></p> <p>The proposals support the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.</p> <p>The proposals support the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by 'making the healthy choice the easy choice'.</p> <p>In setting out its measures of success, the Emission Based Charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets - to benefit residents and businesses alike</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p>Improved Air Quality</p> <p>Improved physical and mental health outcomes</p> <p><b>Potential Negative Impact</b></p> <p>None identified</p> <p><b>Transition to Cashless parking</b></p>



				<p>If the emissions based charges are agreed, the on and off street pay and display machines will need to be reviewed, to ensure that there is minimal adverse impact.</p> <p>Positive impact</p> <p>Ease of access via phone and mobile phone</p> <p>No need for cash – convenience</p> <p>There are no changes to concessions for Blue Badge Holders</p> <p><b>Negative Impact</b></p> <p>None Identified</p> <p><b>Visitor Scratch Cards</b></p> <p>Visitor scratch cards are paper, non-vehicle specific, permits valid for a full day or half days parking within a CPZ, and are given by residents to friends, relatives and tradespeople visiting their address. Because these permits cannot be sold in a way that would reflect the appropriate cost for each vehicles emissions, it will be necessary for these permits to be priced so that they reflect the maximum charge that could be payable. As a result of this, consideration should be given to withdrawing these permits over time, whilst ensuring that provision is made for customers who are unable to book parking via a smart phone</p> <p><b>Positive impact</b></p> <p>None identified</p> <p><b>Negative Impact</b></p> <p>None identified</p>
<b>Socio-economic status</b>	X		X	<p><b><u>Positive Impact</u></b></p> <p>The proposals support the previous rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and</p>

				<p>environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.</p> <p>The proposals support the Public Health vision to protect and improve physical and mental health outcomes for the whole population in Merton, and to reduce health inequalities. At the heart of the strategy is the concept that the environment is a key driver for health. It can be summarised by 'making the healthy choice the easy choice'.</p> <p>In setting out its measures of success, the Emission Based Charging policy aims to deliver reduced car ownership and usage across the borough, encourage more people to undertake alternative forms of active travel, purchase fewer resident permits and lead to a rebalancing of our streets - to benefit residents and businesses alike</p> <p>This includes the shift to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality, and demand for kerbside space, which form the backdrop of the policy direction.</p> <p><b>Negative Impact</b></p> <p>Any increase in parking charges has the potential to negatively impact on those from certain socio economic backgrounds.</p> <p>Significant social inequalities exist within Merton. The eastern half has a younger, less affluent and more ethnically mixed population. The western half is less ethnically mixed, older and more affluent. Largely as a result, people in East Merton have worse health and shorter lives.</p> <p>In the parking charges review, it was identified that those in this group are more likely to live in areas where access to public transport is not as good as in other areas of the borough, and as a result of this, the permit charge was calculated to reflect this.</p>
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				<p>The improvement action plan below sets out a number of mitigations to address the above points.</p> <p>The council considers that the impact is proportionate to the legitimate aim sought to be achieved through the policy.</p> <p>Motorists in this group are more likely to own an older, more polluting vehicle, and as a result of this, are likely to have to pay higher charges for residents parking and pay and display parking, and are likely to be less able to replace their vehicle with a newer less polluting vehicle.</p> <p>There are concerns that those within this group would be less likely to have access to a bank card, however, given the requirements to register, insure, and run a vehicle, it is unlikely that a motorist does not have access to a bank card.</p> <p>There may be a number of residents who do not own a mobile phone, and would not be able to make a cashless payment, however, Smart phone ownership is at approximately 90% of the adult population.</p>
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**7. If you have identified a negative impact, how do you plan to mitigate it?**

The mitigations for disability, age, pregnancy and maternity, and socio-economic status are set out in the Action Plan below.

**Stage 4: Conclusion of the Equality Analysis**

**8. Which of the following statements best describe the outcome of the EA (Tick one box only)**

Please refer to the guidance for carrying out Equality Assessments is available on the intranet for further information about these outcomes and what they mean for your proposal

- Outcome 1** – The EA has not identified any potential for discrimination or negative impact and all opportunities to promote equality are being addressed.
- Outcome 2** – The EA has identified adjustments to remove negative impact or to better promote equality.
- Outcome 3** – The EA has identified some potential for negative impact or some missed opportunities to promote equality and it may not be possible to mitigate this fully.
- Outcome 4** – The EA shows actual or potential unlawful discrimination.

**Stage 5: Improvement Action Pan**

8. Equality Analysis Improvement Action Plan template – Making adjustments for negative impact

Negative impact/ gap in information identified in the Equality Analysis	Action required to mitigate	HOW WILL YOU KNOW THIS IS ACHIEVED? E.G. PERFORMANCE MEASURE/ TARGET)	By when	Existing or additional resources?	Lead Officer	Action added to divisional/ team plan?
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Disability	<p>A number of disabled working age Merton residents receive benefit support. In November 2016, 900 disabled Merton residents claimed benefits. This equates to 0.7%, which is the same as London.</p> <p>Merton is committed to supporting its residents that have mobility issues, and there are a number of ways we currently support this objective.</p> <p>Merton is a member of the national Blue Badge scheme. The Blue Badge provides a range of parking and other motoring concessions for people who are registered blind or have severe mobility problems. Blue Badge holders can park free of charge in any Merton disabled parking bay, pay &amp; display and shared use bay or permit holder bay.</p> <p>Last year the Blue Badge eligibility scheme was extended to include those whose mobility is affected by a wide range of mental health issues. This has extended our current provision to support additional residents within the Borough.</p> <p>A Blue Badge holder in Merton is entitled to apply</p>	<p>Customer feedback</p> <p>Number of applications of Blue Badge &amp; free carer permits</p> <p>Number of Applications for disabled bays</p> <p>Access improvements to public transport infrastructure</p> <p>Ensuring we have suitable accessibility options (channels)</p>				
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	<p>for a free carer permit under certain conditions. This is to further support those residents with mobility issues and in need of regular support and care. The carer permit eligibility is based on being a Blue Badge holder.</p> <p>Any increase in charges is offset by eligibility for a Blue Badge, which provides free on street parking at many locations, including on single and double yellow lines.</p> <p>Those with disabilities are also able to apply for the creation of a disabled bay.</p> <p>LBM residents who have a substantial and permanent physical or sensory disability that affects their mobility and means they are unable to use public transport without extreme difficulty, are eligible for Taxicards.</p> <p><b>Dial a ride</b></p> <p>Dial a ride is a free door to door service, Merton does not fund this. Individuals must have a permanent or long term disability which means they are unable to use public transport some or all of the time.</p> <p><b>Merton Community Transport</b></p> <p>MCT provides accessible minibuses, MPV's (Multi Passenger Vehicles), a Mobility Van, Scootability, Shopmobility scooters, electric powered wheelchairs and manual wheelchairs, voluntary support, information and advice and signposting on transport accessibility issues.</p> <p><b>Personalised Transport Services (PTS)</b></p>	<p>for disabled users who wish to make payments and access assistance with regard to the service</p> <p>Civil enforcement officers and parking staff have been trained to help administer the new Blue Badge regulations and assist those with mental health issues including dementia friendly training</p>				
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The vehicles used are wheelchair accessible MPV's and can carry passengers, their friends and carers, escorts and others as required. Merton Community Transport runs a 'Happy Shoppers' shopping shuttle on Wednesdays to Sainsbury's/Marks & Spencer in Colliers Wood. This is a door to door service targeted at, but not restricted to, older people and those with mobility requirements. Transport for hospital appointments should be arranged through the hospital or GP. Healthcare Travel Cost Scheme Patients who receive certain benefits or allowances can request to have transport costs reimbursed. These include Income Support, Income based Job Seekers Allowance, Income-related ESA, Pension Credit Guarantee Credit, Child's Tax Credit, Working Tax Credit with a disability element, Universal Credit or the NHS Low Income Scheme.

TFL Transport Mentoring Service offers support to disabled Londoners who want to broaden their horizons and make use of the many mainstream accessible public transport options. Advice is given on planning a journey using an accessible route and a mentor is provided to accompany the traveller for up to 5 journeys. Assistance is also provided for people who wish to use mobility scooters and other mobility aids on London's bus services.

**The Disabled Parking Accreditation - British Parking Association.**

The Disabled Parking Accreditation (DPA) is owned by Disabled Motoring UK and managed by the British Parking Association.

The DPA is primarily aimed at improving parking for disabled people and reducing abuse of disabled spaces. It requires owners/operators to adopt an active management strategy to ensure that there is a minimal occurrence of disabled bay abuse, there Page 69 are facilities suitable for disabled people and that recognition is made of the extra time taken by disabled people in the form of a concession. The purpose of the DPA is to:

- Ensure the accessible bays provided meet Building Regulation size
- Provide guidance to owners, operators and developers of parking facilities on the suitable number of accessible bays to be provided
- Ensure disabled motorists can use the car park with ease
- Raise awareness among the general public that the owner/operator has considered and, where appropriate, taken action and introduced measures to ensure the parking facility is suitable for disabled motorists
- Provide an easy way for disabled motorists to locate a car park which is suitable for their needs
- Reduce disabled bay abuse
- Ensure disabled people are not penalised for the extra time taken when using parking facilities Merton. The following car parks meet the required standard.

1. Sibthorpe Road



	<p>2. St Marks 3. Morden Park 4. Kenley Road 5 Hartfield Road 6. Broadway</p> <p>Respondents to the survey recorded comments regarding accessibility issues in relation to public transport. The Council works closely with TfL and Network Rail to ensure that the Highway infrastructure accommodates the efficiency of public transport services. This includes accessibility.</p>					
<p>Age</p>	<p>Merton has 22,350 people aged 65-84 years old (10.7% of the total population). By 2025, this is predicted to increase to 24,350 (11.2%). 10,350 live in east Merton compared to 12,000 in west Merton. By 2025 there is expected to be an increase to 11,550 in east Merton and almost 12,800 in west Merton.</p> <p>An estimated 3,650 people aged 85 years and over (1.7% of the total population) currently live in Merton. By 2025, this is predicted to increase to almost 3,950 (1.8%). In 2018, 1,450 live in east Merton compared to almost 2,200 in west Merton. By 2025 there is expected to be an increase to 1,550 in the east compared to 2,400 in the west of Merton.</p> <p>A number of disabled working age Merton residents receive benefit support. In November 2016, 900 disabled Merton residents claimed benefits. This equates to 0.7%, which is the same</p>	<p>Customer feedback</p> <p>Number of applications of Blue Badge &amp; free carer permits</p> <p>Number of Applications For disabled bays</p> <p>Access improvements to public transport infrastructure</p> <p>Ensuring we have suitable accessibility</p>	<p>Current</p>	<p>Existing</p>	<p>Ben Stephens</p>	<p>Yes</p>

	<p>as London.</p> <p>Merton is committed to supporting its residents that have mobility issues, and there are a number of ways we currently support this objective.</p> <p>Merton is a member of the national Blue Badge scheme. The Blue Badge provides a range of parking and other motoring concessions for people who are registered blind or have severe mobility problems. Blue Badge holders can park free of charge in any Merton disabled parking bay, pay &amp; display and shared use bay or permit holder bay.</p> <p>Last year the Blue Badge eligibility scheme was extended to include those whose mobility is affected by a wide range of mental health issues. This will extend our current provision to support additional residents within the Borough.</p> <p>A Blue Badge holder in Merton is entitled to apply for a free carer permit under certain conditions. This is to further support those residents with mobility issues and in need of regular support and care. The carer permit eligibility is based on being a Blue Badge holder.</p> <p>Any increase in charges is offset by eligibility for a Blue Badge, which provides free on street parking at many locations, including on single and double yellow lines.</p> <p>Those with disabilities are also able to apply for the creation of a disabled bay.</p> <p>LBM residents who have a substantial and permanent physical or sensory disability that affects their mobility and means they are unable to</p>	<p>options (channels) for older users who wish to make payments and access assistance with regard to the service</p> <p>Civil enforcement officers and parking staff have been trained to help administer the new Blue Badge regulations and assist those with mental health issues including dementia friendly training</p>				
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use public transport without extreme difficulty, are eligible for Taxicards.

**Dial a ride**

Dial a ride is a free door to door service, LBM does not fund this. Individuals must have a permanent or long term disability which means they are unable to use public transport some or all of the time.

**Merton Community Transport**

MCT provides accessible minibuses, MPV's (Multi Passenger Vehicles), a Mobility Van, Scootability, Shopmobility scooters, electric powered wheelchairs and manual wheelchairs, voluntary support, information and advice and signposting on transport accessibility issues.

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The vehicles used are wheelchair accessible MPV's and can carry passengers, their friends and carers, escorts and others as required. Merton Community Transport runs a 'Happy Shoppers' shopping shuttle on Wednesdays to Sainsbury's/Marks & Spencer in Colliers Wood. This is a door to door service targeted at, but not restricted to, older people and those with mobility requirements. Transport for hospital appointments should be arranged through the hospital or GP. Healthcare Travel Cost Scheme Patients who receive certain benefits or allowances can request to have transport costs reimbursed. These include Income Support, Income based Job Seekers Allowance, Income-related ESA, Pension Credit Guarantee Credit, Child's Tax Credit, Working Tax Credit with a disability element, Universal Credit or

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the NHS Low Income Scheme.

TFL Transport Mentoring Service offers support to disabled Londoners who want to broaden their horizons and make use of the many mainstream accessible public transport options. Advice is given on planning a journey using an accessible route and a mentor is provided to accompany the traveller for up to 5 journeys. Assistance is also provided for people who wish to use mobility scooters and other mobility aids on London's bus services.

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- Ensure the accessible bays provided meet Building Regulation size
- Provide guidance to owners, operators and developers of parking facilities on the suitable number of accessible bays to be provided
- Ensure disabled motorists can use the car park

with ease

- Raise awareness among the general public that the owner/operator has considered and, where appropriate, taken action and introduced measures to ensure the parking facility is suitable for disabled motorists
- Provide an easy way for disabled motorists to locate a car park which is suitable for their needs
- Reduce disabled bay abuse
- Ensure disabled people are not penalised for the extra time taken when using parking facilities Merton. The following car parks meet the required standard.

1. Sibthorpe Road
2. St Marks
3. Morden Park
4. Kenley Road
5. Hartfield Road
6. Broadway

Respondents to the survey recorded comments regarding accessibility issues in relation to public transport. The Council works closely with TfL and Network Rail to ensure that the Highway infrastructure accommodates the efficiency of public transport services. This includes accessibility.

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## Cashless Parking

### Access to bank cards.

The cost of maintaining a car in London is significant and includes, car tax, insurance, fuel and maintenance. This cost/expenditure would mean that it is very unlikely that a vehicle owner did not have a bank card to make payment at locations where card only payments are to be accepted.

However, there may be some residents, (who are more likely to be elderly) who do not have a bank card.

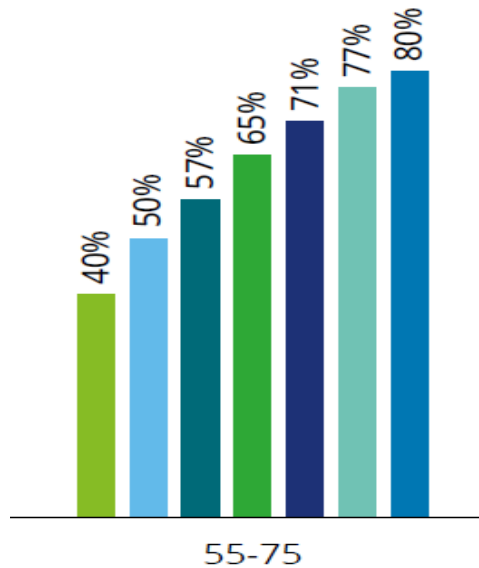
Debit or Credit card ownership in the UK is significant with a growing trend of more ownership and usage. In addition, the use of contactless payments has increased in recent years which has made payment quicker and easier. Statistics show the younger the age the higher the ownership and use. For the more elderly most own a bank card which would be used for payment. Individuals who drive a vehicle for business and or pleasure are more active and mobile, and are already more likely to use a bank card to make payments.

### Access to smart phones

Smartphone adoption among 55-75-year-olds in the UK has now reached 80%. (Graph below)  
Therefore 80% of 55-75-year-old have the option to pay by smart phone. This figure is for the UK and it is known that there is a greater uptake of digitalisation in London and the South East. 18-24-year-olds, market penetration is at a record 96%. 95% of smart phone users have used their

phone within the last 24 hours which shows regular use. (Deloitte Survey September 2019).

The table below shows increase in smart phone ownership over the last 7 years with it being at 80% in 2019.



**Pregnancy and Maternity**

It is recognised that the aim is to encourage a greater use of public transport, but it is also recognised that the impact on this group is likely to impact in 2 ways;

Firstly, in families where there are a number of small children, coupled with the legal requirement for children under a certain age to be in a child seat, and for infants to also be sat on a booster seat it is recognised that car ownership for these

Customer Feedback

Access improvements to public transport infrastructure

Lobby TfL for

	<p>individuals may be more necessary than for other groups.</p> <p>It is also recognised that there are still stations that do not have step free access, making it difficult for mothers with small children and buggies to access these stations without assistance.</p>	improved access				
<b>Race</b>	<p>Significant social inequalities exist within Merton. The eastern half has a younger, less affluent and more ethnically mixed population. The western half is less ethnically mixed, older and more affluent. Largely as a result, people in East Merton have worse health and shorter lives.</p> <p>Healthy life expectancy at birth in males is 65.4 years and 66.3 years in females, therefore many residents are living a considerable proportion of their lives with ill health. The gap between the 30% most and 30% least deprived areas is also significant: 9.4 years for men, 9.3 for women so someone living in a deprived ward in the east of the borough is likely to spend more than 9 years more of their life in poor health than someone in a more affluent part of the borough, which will impact on the last years of working life, on family life and on a healthy and fulfilling retirement.</p> <p>Economic factors are highly correlated with health outcomes, and socio-economic status is a major determinant of both life expectancy and healthy life expectancy. The 2015 IMD (Index of Multiple Deprivation) score shows that Merton as a whole is less deprived (14.9) compared to London (23.9) and England (21.8). However, East Merton has an average IMD score of 21.1 compared to West</p>	<p>Customer Feedback</p> <p>Increased Number of new car club members</p> <p>Reduction in number of permits</p> <p>Number of bikes hired &amp; cycle journeys made</p> <p>We are reviewing the introduction of 1 and/or 3 monthly payment options, to assist those who cannot afford a 6 or 12 month permit in one payment</p>				



Merton which is 8.2.

Any increase in emission based charges has the potential to negatively impact those on lower incomes, however in mitigation, it is recognised that the poorer areas of the borough do not have as good transport links as the more affluent areas of the borough, and in recognition of this the rationale behind of 'Public Transport Accessibility Levels' which is part of our existing changing policy addresses this issue.

Merton is aiming to ensure that every resident has access to car club vehicles. They offer a convenient and affordable service, while at the same time reducing overall car usage.

Car clubs can provide you with an alternative means of accessing a car when you need one, without all the cost or hassle of owning one yourself. You can find car club cars parked on street throughout Merton in CPZ areas.

For example, research commissioned by Zipcar in 2016 indicated that the average annual cost of owning and running a car in London is approximately £3,500. The proposed increase in permit prices would be equivalent to around 0.14% - 2.5% of that average annual cost of owning/running a car in London, dependent on the location of the CPZ.

There are a number of instances where charges have been reduced, particularly in respect of Electric Vehicles, which have a positive impact on health. Season tickets for local residents and workers have also been subjected to greater reductions. An alternative cheaper, healthier form

of transportation and one that a number of respondents highlighted was that more people would cycle if they were able to hire bikes in Merton

There is significant potential to encourage residents to cycle more, especially for short commuter and leisure trips.

Officers have reviewed the equity of the proposals and accept that there will be some residents who may be negatively impacted. However, in light of the mitigation set out above the level of impact is assessed as likely to be low. The council considers that the impact is proportionate to the legitimate aim sought to be achieved through the policy. Individuals should be aged 18-60 and in receipt of Income Support, Employment and Support Allowance, or Jobseekers Allowance for 13 weeks. They will pay 50% of their fares on buses and trams only. An application form can be downloaded from [www.tfl.gov.uk](http://www.tfl.gov.uk) Adults: Free & discounted travel - Transport for London

#### **Jobcentre Plus Travel Discount**

The jobcentre plus travel discount card allows discounted travel if the customer is looking for work. To be eligible for a card, the customers must be in receipt of one of the following:

- Jobseekers Allowance, if you're aged between 18- 24 and have been unemployed for 3-9 months
- Jobseekers Allowance, if you're aged 25 or over and have been unemployed for 3-12 months
- Incapacity Benefit, Employment and Support

Allowance or income support and working with an advisor on returning to employment To apply for a jobcentre plus travel discount card, applications will need to be made at the local jobcentre plus office.

Transport for hospital appointments should be arranged through the hospital or GP. Healthcare Travel Cost Scheme Patients who receive certain benefits or allowances can request to have transport costs reimbursed. These include Income Support, Income based Job Seekers Allowance, Income-related ESA, Pension Credit Guarantee Credit, Child's Tax Credit, and Working Tax Credit with a disability element, Universal Credit or the NHS Low Income Scheme.

#### **Cashless pay and display machines.**

##### Access to bank cards.

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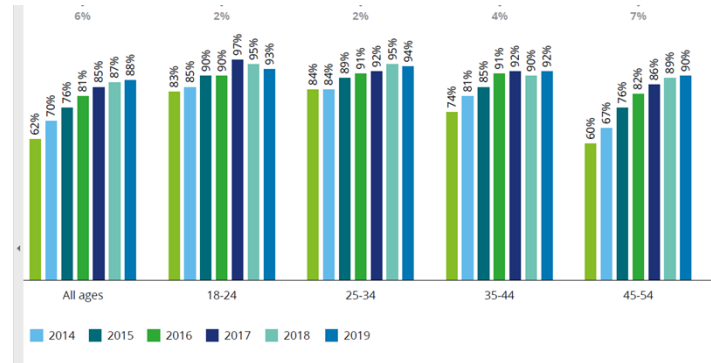
However, there may be some residents, (who are more likely to be unable to get credit or a bank account) who do not have a bank card.

Debit or Credit card ownership in the UK is significant with a growing trend of more ownership and usage. Particularly as a result of COVID19.

Further the use of contactless payments has increased in recent years which has made payment quicker and easier. Statistics show the

younger the age the higher the ownership and use. However, individuals who drive a vehicle for business and more likely to use a bank card to make payments.

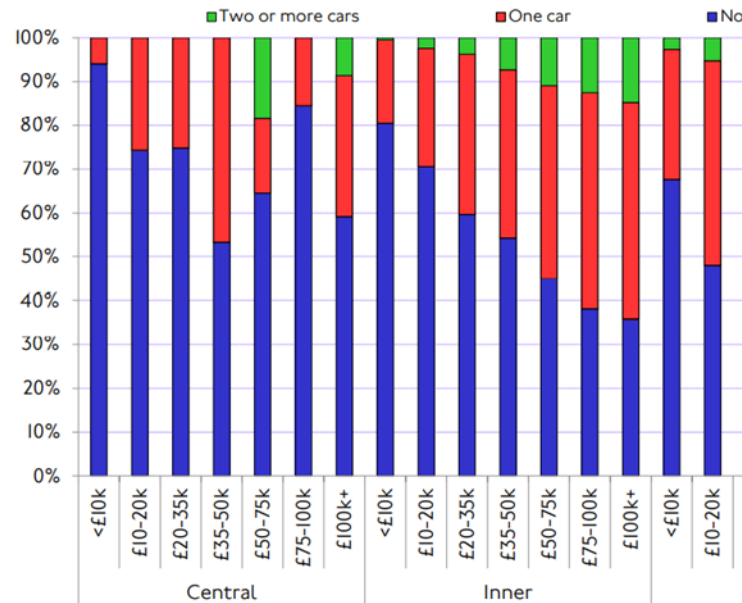
Access to phones



The graph above shows that no less than 90% of all UK residents (in each age group) up to the age of 75 own a 'Smartphone. It is clear that the ability to pay by phone is accessible to all and there is little indication that a low socio economic status has an effect on phone ownership, particularly in cases where a car is also owned or used by the individual.

The council is mindful of economic challenges facing many residents and visitors to the borough, but this needs to be balanced with obligations to due poor levels of air quality and improve public health. Poor air quality and public health is known to particularly affect vulnerable groups including those on lower incomes. Lower income groups in Outer London are also less likely to own a vehicle as demonstrated by data shown in the following chart (TfL Travel in London report 12). Therefore, lower income groups are much less likely to be

affected by the proposals but are more likely to suffer the negative impacts of car use.



Source: Strategic Analysis, TfL City Planning.

**Socio-economic status**

Significant social inequalities exist within Merton. The eastern half has a younger, less affluent and more ethnically mixed population. The western half is less ethnically mixed, older and more affluent. Largely as a result, people in East Merton have worse health and shorter lives.

Healthy life expectancy at birth in males is 65.4 years and 66.3 years in females, therefore many residents are living a considerable proportion of their lives with ill health. The gap between the 30% most and 30% least deprived areas is also significant: 9.4 years for men, 9.3 for women so someone living in a deprived ward in the east of the borough is likely to spend more than 9 years more of their life in poor health than someone in a

Customer Feedback

Increased Number of new car club members

Reduction in number of permits

Number of bikes hired & cycle journeys made

We are reviewing

	<p>more affluent part of the borough, which will impact on the last years of working life, on family life and on a healthy and fulfilling retirement.</p> <p>Economic factors are highly correlated with health outcomes, and socio-economic status is a major determinant of both life expectancy and healthy life expectancy. The 2015 IMD (Index of Multiple Deprivation) score shows that Merton as a whole is less deprived (14.9) compared to London (23.9) and England (21.8). However, East Merton has an average IMD score of 21.1 compared to West Merton which is 8.2.</p> <p>Any increase in emission based charges has the potential to negatively impact those on lower incomes, however in mitigation, it is recognised that the poorer areas of the borough do not have as good transport links as the more affluent areas of the borough, and in recognition of this the rationale behind of 'Public Transport Accessibility Levels' which is part of our existing changing policy addresses this issue.</p> <p>Merton is aiming to ensure that every resident has access to car club vehicles. They offer a convenient and affordable service, while at the same time reducing overall car usage.</p> <p>Car clubs can provide you with an alternative means of accessing a car when you need one, without all the cost or hassle of owning one yourself. You can find car club cars parked on street throughout Merton in CPZ areas.</p> <p>For example, research commissioned by Zipcar in 2016 indicated that the average annual cost of owning and running a car in London is</p>	<p>the introduction of 1 and/or 3 monthly payment options, to assist those who cannot afford a 6 or 12 month permit in one payment</p>				
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approximately £3,500. The proposed increase in permit prices would be equivalent to around 0.14% - 2.5% of that average annual cost of owning/running a car in London, dependent on the location of the CPZ.

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### **Cashless pay and display machines.**

#### Access to bank cards.

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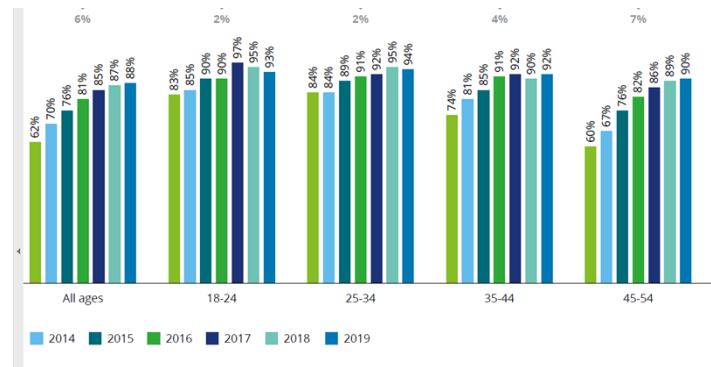
payments are to be accepted.

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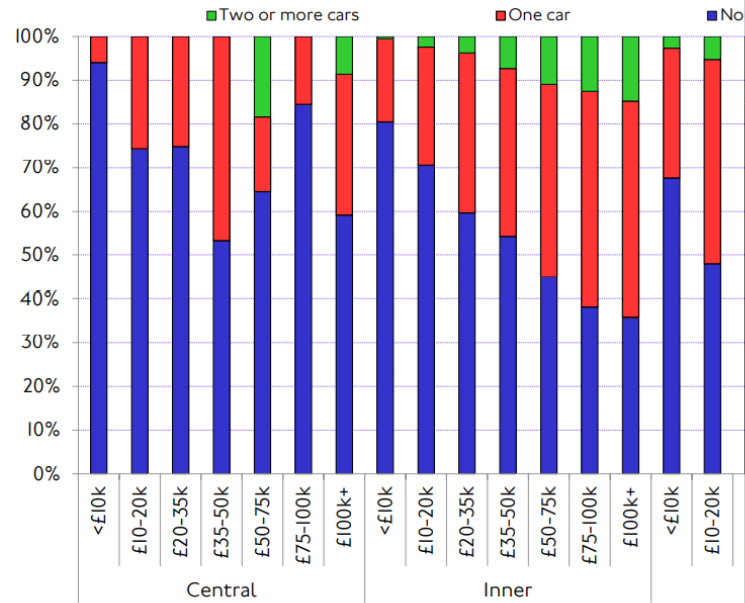
Access to phones



The graph above shows that no less than 90% of all UK residents (in each age group) up to the age of 75 own a 'Smartphone. Figures cannot be found for a normal mobile phone. It is clear that the ability to pay by phone is accessible to all and there is little indication that a low socio economic status has an effect on phone ownership, particularly in cases where a car is also owned or

used by the individual.

The council is mindful of economic challenges facing many residents and visitors to the borough, but this needs to be balanced with obligations to due poor levels of air quality and improve public health. Poor air quality and public health is known to particularly affect vulnerable groups including those on lower incomes. Lower income groups in Outer London are also less likely to own a vehicle as demonstrated by data shown in the following chart (TfL Travel in London report 12). Therefore, lower income groups are much less likely to be affected by the proposals but are more likely to suffer the negative impacts of car use.



Source: Strategic Analysis, TfL City Planning.

Note that the full impact of the decision may only be known after the proposals have been implemented; therefore, it is important the effective monitoring is in place to assess the impact.

## Stage 6: Reporting outcomes

### 10. Summary of the equality analysis

This section can also be used in your decision-making reports (CMT/Cabinet/etc.) but you must also attach the assessment to the report, or provide a hyperlink

This Equality Analysis has resulted in an Outcome **3** Assessment

**Please include here a summary of the key findings of your assessment.**

Vehicles contribute to poor air quality. An increase on the charge will have the effect of nudging vehicle owners away from owning a vehicle. Reduced car ownership will help deliver key strategic council priorities including public health, air quality and sustainable transport and deliver an effective parking management strategy.

The Council have assessed the use of public transport and active travel and are considering alternatives to owning a vehicle. There are also other vehicle types such as electric or hybrid which are clear alternatives.

There are both negative and positive impacts identified by the EA

**Positive Impact**

The proposals support the rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.

In setting out its measures of success, the new PCN charging bands aims to deliver:

1. Reduced congestion
2. Improved air quality to meet EU quality standards
3. To meet the actions set out in the Merton Health and Wellbeing Strategy 2019
4. Adopt a healthy street approach
5. Promote healthier life styles and encourage more active travel

### **Neutral Impact**

There are no implications for Blue Badge Holders.

### **Negative Impact**

The increased cost of the emissions based charging could have a negative effect on individuals who own an older, more polluting vehicle, and find the additional charge challenging, and would also find it difficult to replace their vehicle with a newer 'less polluting' vehicle. This is mitigated because there are a number of alternatives to the use/ownership of a vehicle, including car clubs and cleaner vehicles, or the transition to more active and sustainable transport modes (such as walking, cycling and public transport) the impact of vehicle emissions and congestion on air quality.

While it has been recognised that the move to emissions based charging would particularly impact negatively on those in the lower, socio economic groups, data published by TfL shows that those in lower socio economic groups are less likely to own a vehicle, and are therefore less likely to be affected by these charges.

To facilitate this introduction of an on/off street emissions based charge, key infrastructure will be upgraded for emission based charging. At all other locations, the use of the pay and display machines will be monitored, and a gradual programme to remove the least used, whilst causing as little disruption will take place. This will mean that in some locations payment by mobile phone will be the only option. Data shows that no less than 90% of all UK residents (in each age group) up to the age of 75 own a 'Smartphone'. It is clear that the ability to pay by phone is accessible to all and there is little indication that a low socio economic status has an effect on phone ownership, particularly in cases where a car is also owned or used by the individual.

### **Monitoring**

The original equalities assessment has been updated following the recent engagement with equalities groups. (October 2020). The Improvement Action Plan in Section 5 of the document sets out the actions and timescales proposed to be undertaken and the EA plan will be signed off and monitored by the Director of Environment and Regeneration and the Head of Parking Services.

The EA Plan and the policy would be kept under review and representatives of the affected groups will be consulted with to assess ongoing impacts and further mitigations.

There is a commitment that the EA Plan will be reviewed in 12 months' time and will be published on the Council's website.

**What course of action are you advising as a result of this assessment?**

Section 5 – Improvement Action Plan sets out the actions and timescales proposed to be undertaken.

**Stage 7: Sign off by Director/ Head of Service**

<b>Assessment completed by</b>	Ben Stephens – Head of Parking Services	<b>Signature:</b>	<b>Date: 27th November 2020</b>
<b>Improvement action plan signed off by Director/ Head of Service</b>	Chris Lee – Director of Environment and Regeneration	<b>Signature:</b>	<b>Date:</b>