

Appendix 4

Equality Impact Assessment (EIA) Engagement and our equality duty

Whilst [the Gunning Principles](#) set out the rules for consulting ‘everyone’, additional requirements are in place to avoid discrimination and inequality.

Cheshire East Council is required to comply with the Equality Act 2010 and the Public Sector Equality Duty. The Equality Act 2010 simplified previous anti-discrimination laws with a single piece of legislation. Within the Act, the Public Sector Equality Duty (Section 149) has three aims. It requires public bodies to have due regard to the need to:

- eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act, by consciously thinking about equality when making decisions (such as in developing policy, delivering services and commissioning from others)
- advance equality of opportunity between people who share a protected characteristic and people who do not share it, by removing disadvantages, meeting their specific needs, and encouraging their participation in public life.
- foster good relations between people who share a protected characteristic and people who do not.

The Equality Duty helps public bodies to deliver their overall objectives for public services, and as such should be approached as a positive opportunity to support good decision-making.

It encourages public bodies to understand how different people will be affected by their activities so that policies and services are appropriate and accessible to all and meet different people’s needs. By understanding the effect of their activities on different people, and how inclusive public services can support and open up people’s opportunities, public bodies are better placed to deliver policies and services that are efficient and effective.

Complying with the Equality Duty may involve treating some people better than others, as far as this is allowed by discrimination law. For example, it may involve providing a service in a way which is appropriate for people who share a protected characteristic, such as providing computer training to all people to help them access information and services.

The Equality Act identifies nine ‘protected characteristics’ and makes it a legal requirement to make sure that people with these characteristics are protected from discrimination:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnerships
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Applying the equality duty to engagement

If you are developing a new policy, strategy or programme you may need to carry out an Equality Impact Assessment. You may be able to ascertain the impact of your proposal on different characteristics through desk-based research and learning from similar programmes, but you also need to carry out some primary research and engagement. People with protected characteristics are often described as ‘hard to reach’ but you will find everyone can be reached – you just need to tailor your approach, so it is accessible for them.

Contacting the [Equality and Diversity mailbox](#) will help you to understand how you can gain insight as to the impacts of your proposals and will ensure that you help the Council to comply with the Equality Act 2010 and the Public Sector Equality Duty.

Section 1 – Details of the service, service change, decommissioning of the service, strategy, function or procedure.

Proposal Title	MTFS (Medium Term Financial Strategy) Parking Review
Date of Assessment	13 November 2023
Assessment Lead Officer Name	Mark Fleming/Lorraine Martin
Directorate/Service	Place (Strategic Transport & Parking – Parking Services)
Details of the service, service change, decommissioning of the service, strategy, function or procedure.	<p><u>Details of the Proposed Service Change</u></p> <p><u>Brief Description of the proposals</u></p> <ul style="list-style-type: none"> • <i>Introduction of parking charges across free towns</i> • <i>Adjust existing parking tariffs across towns that already charge for parking in line with the proposals for the Free Towns (Low, Medium & High Tariffs).</i> • <i>Amend some on-street limited waiting bay time restrictions.</i> • <i>Potentially remove the option of cash payment at Pay & Display Machines (Cashless).</i> <p>Subject to a final decision being made at the Highways and Transport Committee in January 2024, the recommendations of the MTFS Parking Review propose to introduce parking charges in towns that are currently free, modify and potentially increase parking charges in towns that currently charge and potentially remove the option of paying for parking by cash (Going cashless).</p> <p>A separate Equality Impact Assessment has been conducted to specifically assess any implication for removing cash payments.</p> <p>The Council has only increased parking charges once since Cheshire East was formed in 2009. This is no longer sustainable because of the rate of inflation. This means that the costs of maintaining, managing and operating car parks and other parking spaces has significantly increased.</p> <p>In future, parking income and any surplus could help to support other transport services across Cheshire East. This would benefit residents by:</p>

	<ul style="list-style-type: none"> • improving highways • subsidising local buses not subsidised • supporting active travel schemes
<p>Who is Affected?</p>	<p>The proposals will affect the actual service users (I.e., those who drive a motorised vehicle and need a space to park) who may be residents, workers, commuters, shoppers and visitors to the borough. The ethos is – ‘the user pays’ rather than the Council Tax payers of Cheshire East as some do not use vehicles (circa 25,000 households in the 2021 Census) and/or do not use our car parks.</p> <p>These proposals could affect residents and businesses as a consequence of potential parking displacement.</p>
<p>Links and impact on other services, strategies, functions or procedures.</p>	<p>The proposals link to and impact on several other services and strategies. This includes staff travel plans, school SMOTS (Sustainable Modes of Travel to School), Local Transport Plans, Town Vitality Plans, Regeneration projects, the effects of the cost-of-living crisis, Air Quality and public health and wellbeing.</p> <p>However, it has a significant impact on the services budget and the council’s financial situation MTFS.</p> <p>The outcomes are deemed to be consistent with the aims and objectives contained within the High-Level Parking Strategy that appends the adopted Local Transport Plan (2019 – 2024).</p>

<p>How does the service, service change, strategy, function or procedure help the Council meet the requirements of the Public Sector Equality Duty?</p>	<p>The Public Sector Equality Duty is a legal requirement contained within the Equality Act 2010 which requires public authorities and others carrying out public functions to have due regard to the need to: -</p> <ul style="list-style-type: none"> • Eliminate unlawful discrimination, harassment and victimisation. • Advance equality of opportunity between people who share a protected characteristic and those who do not • Foster good relations between people who share a protected characteristic and those who do not <p>The above aims may be more relevant to some proposals than others, and they may be more relevant to some protected characteristics than others. However, it is advisable that the proposal be assessed against each of the above aims.</p> <p>The proposals have been assessed against each of the above aims but have little/no relevance to them. The proposals do not impact on the importance of ensuring that anyone classed as within a protected characteristic group is protected from discrimination. The proposals do not discriminate based on any group.</p>
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Section 2 - Information – What do you know?

What do you know?	What information (qualitative and quantitative) and/or research have you used to commission/change/decommission the service, strategy, function, or procedure?
<p>Information you used</p>	<p><u>Availability of a Car or Van</u></p> <p>Car or van availability Households</p>

	count	%
All households	174,856	100.0
No cars or vans in household	25,367	14.5
1 car or van in household	71,640	41.0
2 cars or vans in household	58,151	33.3
3 or more cars or vans in household	19,698	11.3

2021 Census data (taken during the Covid pandemic so may not be the true 'norm') shows that 14.5% (circa 25,000 households) do not have access to a car or a van. 2021 Census shows that 52.4% of Cheshire East residents either drive or are a passenger in a car or van as the choice of travel to and/or from work.

Age

Cheshire East has a higher average (median) age than the North West region in 2021 (40 years) and a higher average (median) age than England (40 years).

It is important to mention that there is a link between needing a bank account to purchase a car. Motorised vehicles cost money to purchase (outright or via Hire Purchase), operate and maintain. Financial resources are needed for petrol, charging, servicing, MOTs, road fund license and insurances. The majority of these services generally request payment by card only.

Disability

In 2021, 6.5% of Cheshire East residents were identified as being disabled and limited a lot. This figure decreased from 7.8% in 2011. Conversely, just under 1 in 10 people (9.8%) were identified as being disabled and limited a little, compared with 9.5% in 2011. The proportion of Cheshire East residents who were not disabled increased from 82.7% to 83.8%.

There are currently 23,000 blue badge holders in Cheshire East, which entitles them to unlimited free parking in Cheshire East car parks.

Income Deprivation

In Cheshire East, **8.3%** of the population was income-deprived in 2019. Of the 316 local authorities in England (excluding the Isles of Scilly), Cheshire East is ranked **226th most income deprived**. [Exploring local income deprivation \(ons.gov.uk\)](#)

Workless Households (Jan-Dec 2022)

	Cheshire East	Northwest	Great Britain
Number Of Workless Households	12,900	373,900	2,858,400
Percentage Of Households That Are Workless	10.8	16.3	13.9
Number Of Children in Workless Households	#	175,300	1,270,500
Percentage Of Children Who Are in Households That Are Workless	#	12.9	10.3

Source: ONS (Office for National Statistics) (Office for National Statistics) annual population survey - households by combined economic activity status

Sample size too small for reliable estimate ([see definitions](#))

Notes: Only includes those households that have at least one person aged 16 to 64.

Children refers to all children aged under 16.

[Labour Market Profile - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](#)

Out-Of-Work Benefits

Under Universal Credit a broader span of claimants are required to look for work than under Jobseeker's Allowance. As Universal Credit Full Service is rolled out in particular areas, the number of people recorded as being on the Claimant Count is therefore likely to rise.

Claimant count by sex - not seasonally adjusted (September 2023)

	Cheshire East (Numbers)	Cheshire East (%)	Northwest (%)	Great Britain (%)
All People	5,550	2.3	4.1	3.7
Males	3,125	2.6	4.9	4.2
Females	2,425	2.0	3.4	3.2

Source: ONS Claimant count by sex and age

Note: % is the number of claimants as a proportion of resident population of area aged 16-64 and gender

- [view time-series](#)
- [compare other areas](#)
- [query dataset...](#)

The Office of National Statistics shows that there were 5550 people in the Cheshire East authority claiming out of work benefits in September 2023. The largest proportion of claimants are aged between 25 and 49. It is likely that this statistic

	<p>incorporates some of those recorded in the ‘Workless Households’ categories, but nevertheless the introduction of parking charges could potentially affect users who are on state benefits.</p> <p>Source: Labour Market Profile - Nomis - Official Census and Labour Market Statistics (nomisweb.co.uk)</p> <p>Our proposed parking tariffs have been benchmarked against neighbouring local authorities (e.g., Stoke-on-Trent, Greater Manchester and Cheshire West). This shows that our proposals would still provide cheaper parking when compared to neighbouring local authorities.</p>
Gaps in your Information	<p>The council’s proposals under the MTFS parking review do not significantly impact anyone with a protected characteristic. Monitoring of parking displacement will take place over a period of time but, drivers/passengers with a Blue Badge are not impacted. There is some further information below in relation to a request for further designated BB parking.</p>

3. What did people tell you?

What did people tell you	
Details and dates of the consultation/s and/or engagement activities	<p>An extended period of the required Statutory Public Consultation took place between 20/9/23 and 6/11/23. Representations which included comments, concerns, support and formal objections were invited from all stakeholders. Statutory notices were placed on street furniture at every affected car park, on-street bays, in newspapers, on our web pages and were made available at all local libraries for inspection.</p> <p>The statutory minimum consultation period for Traffic Regulation Orders and proposed amendments to parking charges is 21 days, the Council has undertaken an extended 6-week consultation period.</p> <p>The main stakeholders who have been formally consulted with, as part of the extended (and statutory) consultation process include:</p>

	<p>Schools, Town and Parish Councils, Members, OSC, Business Reps (e.g., FSB and Chambers) and the emergency services & local supermarket chains (this is not an exhaustive list). The general public also made representations during the consultation period.</p> <p>We have also engaged with the stakeholders by using comms/social media and press releases. We have invited representations via an email inbox and through the website and online channels. There has also been an opportunity for stakeholders to formally write a letter to the Council too. Official signs were put posters up on site (affected car parks and on-street columns) 20/9/23 – 6/11/23.</p> <p>Work has been undertaken in partnership with our comms team.</p> <p>8,384 responses were received.</p> <p>There were some requests for increases to the number of blue badge holder bays in car parks across the borough. This will be reviewed on a case-by-case basis in line with relevant guidance and, where deemed necessary, be incorporated into the parking services maintenance programme.</p>
<p>Gaps in consultation and engagement feedback</p>	<p>A 6-week period of consultation took place. 21 days is the statutory minimum.</p> <p>The proposals attracted protest marches, local, regional and national news coverage and an in-flux of social media comments.</p> <p>There are no perceived gaps in consultation and engagement feedback.</p> <p>Once the representations have been considered, a final set of proposals will be submitted for further consideration by the Highways and Transport Committee in January 2024.</p>

4. Review of information, consultation feedback and equality analysis

Protected characteristics groups from the Equality Act 2010	What do you know? Summary of information used to inform the proposal	What did people tell you? Summary of customer and/or staff feedback	What does this mean? Impacts identified from the information and feedback (actual and potential). These can be either positive, negative or have no impact.
Age	Motorists are above the age of 17. Motorists must hold a valid driving licence which is obtained after passing a driving test and (in the last few years) a written theory test. You must retake this test at regular intervals when they turn 70.	School drop off and pick up of young children could be affected as some walking routes are not appropriate/safe. Requests for free school parking, charges to start later and/or a 30-minute grace period.	Potential negative impact in some areas (Prestbury) where the waling route to the school is inadequate.
Disability	Blue Badge holders are not affected by these proposals as the Council offers free parking to Blue Badge holders. Blue Badge holders may be a driver or passenger and may have a visible or non-visible disability. BB holders may be children.	There were some requests for increases to the number of blue badge holder bays in car parks across the borough. This will be reviewed on a case-by-case basis in line with relevant guidance and, where deemed necessary, be incorporated into the parking services maintenance programme.	No impact – there are still designated Disabled parking bays both on and off-street for Blue Badge holders. Parking remains free for BB holders.
Gender reassignment	N/A		
Pregnancy and maternity	N/A		

Race/ethnicity	N/A		
Religion or belief	N/A		
Sex	N/A		
Sexual orientation	N/A		
Marriage and civil partnership	N/A		

5. Justification, Mitigation and Actions

Mitigation	What can you do?
<p>Please provide justification for the proposal if negative impacts have been identified? Are there any actions that could be undertaken to mitigate, reduce or remove negative impacts?</p> <p>Have all available options been explored? Please include details of alternative options and why they couldn't be considered?</p>	<p>Actions to mitigate any negative impacts or further enhance positive impacts</p> <p>Actions to consider which may mitigate, reduce or remove some negative impacts would be to amend the charging hours to 9 – 6pm. Consider areas on a case-by-case basis where parents/carers may need to park on the car park at drop off and pick up times.</p> <ul style="list-style-type: none"> The Council will receive more parking revenue because of the proposals. This will allow greater enforcement presence in towns where there are parking

<p>Please include details of how positive impacts could be further enhanced, if possible?</p>	<p>issues and more regular maintenance. The Council's intention is always 100% compliance with the parking restrictions.</p> <ul style="list-style-type: none"> • Service users will benefit as the additional parking revenue can be used to maintain car parks to a higher standard and contribute to local transport, road/highway improvement initiatives. The increase in enforcement patrols in each town may also provide a greater sense of security for their vehicle. <p>There were some requests for increases to the number of blue badge holder bays in car parks across the borough. This will be reviewed on a case-by-case basis in line with relevant guidance and, where deemed necessary, be incorporated into the parking services maintenance programme.</p>
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6. Monitoring and Review -

<p>Monitoring and review</p>	<p>How will the impact of the service, service change, decommissioning of the service, strategy, function or procedure be monitored? How will actions to mitigate negative impacts be monitored? Date for review of the EIA</p>
<p>Details of monitoring activities</p>	<p>The impacts of the proposals will be closely monitored – this will be done by analysing complaints, revenues and physical monitoring of the affected areas for any displacement issues. A full set of mitigation measures are being drafted/developed and after a period of monitoring, decisions will be made on whether to progress these which include Residents Parking Schemes, further parking restrictions and/or the removal of parking restrictions.</p> <p>There were some requests for increases to the number of blue badge holder bays in car parks across the borough. This will be reviewed on a case-by-case basis in line with relevant guidance and, where deemed necessary, be incorporated into the parking services maintenance programme.</p>

Date and responsible officer for the review of the EIA	Mark Fleming/Lorraine Martin – 6/11/23 - to be reviewed 6 months on from H & T Committee in Jan 2024.
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7. Sign Off

When you have completed your EIA, it should be sent to the [Equality, Diversity and Inclusion Mailbox](#) for review. If your EIA is approved, it must then be signed off by a senior manager within your Department (Head of Service or above).

Once the EIA has been signed off, please forward a copy to the Equality, Diversity and Inclusion Officer to be published on the website. For Transparency, we are committed to publishing all Equality Impact Assessments relating to public engagement.

Name	Richard Hibbert
Signature	<i>RHibbert</i>
Date	6 December 2023

8. Help and Support

For support and advice please contact EqualityandInclusion@cheshireeast.gov.uk