

WAVERLEY BOROUGH COUNCIL

EXECUTIVE - 5 SEPTEMBER 2017

Title:

BLUE BADGE PARKING CHARGES

**[Portfolio Holder: Cllr James Edwards]
[Wards Affected: All]**

Summary and purpose:

Charging Blue Badge holders for parking was agreed as part of the 2017/18 budget setting process at the meeting of the Full Council on 21 February 2017. The budget proposals, including the introduction of parking charges for Blue Badge holders had previously been discussed at the Joint Overview and Scrutiny Committee on 16 January 2017 and at the Executive meeting on 7 February 2017. There was extensive feedback from the public and from organisations representing disabled persons opposing the introduction of these charges after the decision was made.

Following discussions with and advice from the overarching Disability Alliance Network and the Surrey Coalition of Disabled People and discussions with Executive Members, it was considered that it would be helpful to seek further feedback from disability organisations operating within the Borough through a formal consultation process. This consultation period ran until 21 July 2017. This report summarises the feedback from that consultation, identifies the key themes within that feedback and comments on how these can be addressed.

How this report relates to the Council's Corporate Priorities:

Customer Service – consulting and engaging our customers to ensure services are delivered appropriately. Value for Money – ensuring that the Council takes a robust approach to financial planning in order to continue to deliver excellent services and to live within our means.

Financial Implications:

The parking income budget for 2017/18 included estimated potential income of £75,000 from the introduction of Blue Badge parking charges. The delay in implementing the charges fully has led to less than anticipated income from blue badge holders to date..

If the option of issuing a ticket with an extra hour free of charge is adopted, it is estimated this could reduce the potential income from blue badge holders by a further 25%. Overall, it is estimated that the measures proposed in this report will reduce the income in a full year from £75,000 to £50,000. In 2017/18, the impact, combined with the delayed implementation, is estimated to lose £40,000 compared to budget. As referred to in the budget management report elsewhere on this agenda, this is one of a number of variations from budget that overall have a neutral impact at this stage.

The cost of improving accessibility through the introduction of dropped kerbs and ramps to the nearest pay and display machines and additional signage will be a one-off cost estimated to be £16,000, which will be met from the car park rolling maintenance programme.

The introduction of the permit scheme has been met within existing resources but having issued between 600 and 700 permits, this will also impact on income from parking charges. The permits will be renewed as the person's blue badge is renewed, and ongoing permit renewal is expected to be met within existing resources.

Legal Implications:

The Council is lawfully entitled to introduce charging in respect of disabled blue badge holders. The Council has carried out an appropriate Equality Impact Assessment and has consulted with relevant users and stakeholders. The report sets out the Council's consideration of the consultation responses, financial impact, equalities impact and other relevant considerations.

Background

1. In preparing for the 2017/18 budget Waverley Borough Council had to respond to significant financial cuts in its grant from Central Government and cuts in its New Homes Bonus which meant it had to make savings in excess of £1m to balance the budget for this year. It was inevitable that difficult decisions would have to be made. Wherever possible increasing income was considered as a way to avoid cutting essential services and therefore a range of fees and charges were reviewed including car parking charges.
2. In terms of parking charges, in addition to a general increase in charges on a proportion of the busiest car parks, three options were considered. These were Sunday charging, overnight charging and charging Blue Badge holders (who had previously been able to park for free for unlimited periods). Members opted for the introduction of Blue Badge parking charges in preference to Sunday charging or evening charging.
3. It was recognised by Members that, whilst possession of a Blue Badge was not in itself an indication of financial hardship, some disabled persons were also financially disadvantaged. A permit scheme for persons in receipt of income related benefit, and resident in the Borough, was therefore introduced. In recognition that some disabled residents with higher levels of physical impairment may have problems accessing the pay and display machines or using the pay by phone service, this scheme was extended to include those in receipt of the highest levels of mobility benefits. As a consequence, between 600 and 700 free parking permits have been issued.
4. Following the introduction of the charges and the permit scheme, Waverley Borough Council received 63 formal complaints. These were all responded to at the time and many of the concerns raised were addressed by the extension of the permit scheme to include those in receipt of the highest levels of mobility benefits.

Key themes of feedback

5. The feedback from the Disability Alliance Network, Surrey Coalition of Disabled People and customer complaints can be categorised into the following themes:
 - Accessibility of pay and display machines, both in terms of mobility and dexterity. The distance to Pay and Display machines was also mentioned, although people with mobility issues and in receipt of the higher rate Personal Independence Payment (PIP), higher rate Disability Living Allowance (DLA) or higher rate Attendance Allowance would receive a free permit. Higher levels of PIP, DLA and Attendance Allowance do not cover all customers who may need a permit. In particular this relates to those in receipt of the lower rate of Attendance Allowance, which does not assess mobility.
 - People non-resident in the Borough are unfairly disadvantaged, particularly if Waverley shops/towns/doctors etc are their closest.
 - Costs more to use the Ring-go pay by phone service.
 - Disabled customers may pay more. Lack of choice to use cheaper out of town parking if disability does not allow them to walk far. Additional time needed as disabled customers may be slower to complete tasks, or will need to use several car parks.
6. Following this initial feedback, Waverley suspended enforcement of the charging scheme to carry out further, more extensive consultation, following up on the above themes.
7. A letter was sent to the following recipients who were asked to respond on behalf of their members, or circulate to relevant people / organisations connected with them.
 - Surrey Coalition of Disabled People
 - Godalming Hub and Surrey Disabled People's Partnership
 - South West Disability Alliance Network
 - Parkinson's UK group (as they had already contacted the Council)
8. The letter asked the following questions:
 - a. Waverley is offering free parking permits to residents in receipt of higher rate PIP, higher rate DLA or higher rate Attendance Allowance, or those who are in receipt of an income-related benefit. Based on the group of people you represent, your views are welcomed on whether these or alternative benefits should be considered for free parking.
 - b. Waverley is working hard to ensure that our pay and display machines are as accessible as possible by ensuring there are dropped kerbs at the machines nearest the disabled bays. In addition to this, contactless payments will be made available in the busiest car parks. The Ring-go phone payment system is also available across the Borough. Are there any other suggestions you could make in terms of accessibility of the machines or payment methods?

- c. Waverley does not currently offer free parking permits for customers who live outside the Borough. Please can you give your views on this?
9. The responses from these organisations are attached as Annexe A. The impact themes identified and the suggested mitigation are set out in the table at Appendix 1 to the Equality Impact Assessment. This report is not recommending providing free parking permits for customers who live outside the borough as this would lead to increased costs associated with the management of these permits and would significantly impact on income levels from the new charges.
10. The case mentioned by the Disability Network Alliance is specific to on-street parking, and whilst the Council has legal obligations to ensure its off-street car park income is spent on Transport, Highways and Environmental works, this specific case is not related to off-street parking income.

Equalities Impact Assessment

11. An Equality Impact Assessment has been carried out and has been further developed on the basis of the feedback from the public and the consultation. The latest version is attached as Annexe B.
12. As a result of this assessment, the following mitigations are proposed:
 - a. Modifications of kerbs to the nearest to pay and display machines to provide improved access;
 - b. Additional signage provided close to disabled bays with details of the pay-by-phone service;
 - c. Alternative payment options to continue to be explored
 - d. The introduction of an hour of free parking when purchasing a ticket for blue badge holders; and
 - e. The extension of the criteria for the free permit scheme for blue badge holders to include the lower and higher rate of Attendance Allowance in addition to the higher rate of Personal Independence Payment and the higher rate of Disability Living Allowance.

Survey of other local authorities

13. A survey of current charging practice in other local authorities in the south east was also conducted. The results are set out in tabular form in Annexe C using the RAG system to indicate who charges and who does not for ease of reference. More detailed commentary on the survey is attached as Annexe D.
 14. It is evident from this that there is a mixed picture across the South East of England and a variety of approaches taken by those who do charge. It is for each local authority to determine its policy and approach to charging for Blue Badge holders, having carried out an Equality Impact Assessment, consulted and identified mitigations to address issues raised as appropriate.
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Recommendation

It is recommended that the Executive:

1. agrees that standard parking charges for Blue Badge Holders will apply in all Waverley-owned car parks, in conjunction with the free permit scheme referred to in paragraph 3 of the report;
2. approves the modification of kerbs nearest to pay and display machines to provide improved access, additional signage to be provided close to disabled bays with details of the pay-by-phone service, and further alternative payment options to continue to be explored;
3. approves the introduction of an hour of free parking when purchasing a ticket for Blue Badge Holders; and
4. approves criteria for the free permit scheme for Blue Badge Holders to include the lower and higher rate of Attendance Allowance in addition to the higher rate of Personal Independence Payment and the higher rate of Disability Living Allowance.

Background Papers

There are no background papers (as defined by Section 100D(5) of the Local Government Act 1972) relating to this report.

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Responses from consultees

Joint submission from South West Surrey DAN and Surrey Coalition of Disabled People:

Raised the issue of case law re Barnet BC and revenue etc. and how revenue will be used. Accessibility of payment machines

- Handling coins may be difficult
- Ring-go is more expensive
- Variations and misunderstandings nationally due to varying schemes
- People outside Borough are discriminated against.
- Questioning the income we have stated, and the reduction due to making machines accessible/permit scheme etc.
- Online petition 680 signatures

Vice Chair- South West Surrey DAN

- Suggests first hour for free
- Increase in on street parking
- Should be a national policy on BB parking charges

Chair of Haslemere Macular Support Group (Dr [REDACTED])

- Distance to machines
- Accessibility of machines
- Some people don't want to claim benefits
- Costs more to pay by phone

Parkinson's UK

- Q1- The criteria for higher rate of PIP, DLA or Attendance Allowance are inconsistent, over complex and unfair to people with Parkinson's. PIP does not assess people with Parkinson's fairly, and many people have successfully appealed their decisions.
- On street parking is free, so why have a different system.
- Attendance allowance doesn't assess mobility, so it is nonsensical to use this as a measure.
- Q2- Difficulties with dexterity mean it is hard to pay by phone. They recommend that people should have the ability to pay with cash within a reasonable distance, so as not to discriminate against them.

Mrs [REDACTED]

- Q1- Many people will not receive the enhanced benefit levels, but will be slower. It is discrimination that they will have to pay for longer compared with a non-disabled person.
- Car park in Haslemere has no pedestrian walkways, making it hazardous for scooter or wheelchair users
- Lower mobility criteria for benefits should qualify people for free parking
- Q2- Distance to machines and safety of walking in car parks with no walkways.
- Ring-go is more expensive and manual dexterity may be problematic for using phones.

- Accessibility of machines
- Q3- People outside of the Borough will be discriminated against as they may be in proximity. Many will decide to shop elsewhere- impact on local enterprise.
- Will impact children who are disabled- should seek responses from parents
- We have not adequately communicated the suspension of enforcement.
- Should have shared the consultation with the wider public, not just a few groups

- Distance to the machine
- Costs more to pay by phone, and lack of choice to use this would be discriminatory
- Difficult to use a phone
- Needs more time to complete tasks
- Difficult for parents with disabled children to look after them and then go to pay for parking.
- Applying for a permit is an unnecessary hoop for people with disabilities.
- Cut other areas, not parking for disabled people.

- Increasing traffic on street
- Time limits in disabled bays are too restrictive
- Needs a carer to help with paying for parking
- Machines are not near disabled bays
- Dangerous for people with electric wheelchairs to be going around car parks to pay
- Take more time for disabled people to complete tasks.
- Disabled people incur a lot of additional costs.
- May not be able to use public transport as an alternative.
- The benefits we have suggested to acquire a permit are sensible, however, do not encompass everyone who will have difficulties using the machines.
- Machines and payment boards need to be near disabled bays.
- Should not be an additional charge for disabled users to use Ring-go.
- Lives just outside of the Borough, but volunteers for a charity in Waverley- Haslemere is nearest town to where she lives. Therefore can't get a permit.

DRAFT DOCUMENT

Equality Impact Assessment Form



Name of policy/strategy/procedure/function

Disabled parking- introduction of charges

Name and telephone number of officer completing assessment

Jennifer Carson-Paice (ext 3397)

Date completed

May 2017

Section 1 - What is the policy or activity trying to achieve?

This Equality Impact Assessment will evaluate the potential impact of this service/ policy/function/strategy on Waverley's residents and staff and in particular our protected characteristic groups. It can help staff provide and deliver excellent services by making sure that these reflect the needs of the community and that they do not discriminate.

Before you can assess the potential impact of the activity, it is important to understand exactly what it is trying to achieve.

What **outcomes** are wanted from this policy/activity, what are you trying to achieve?

Charging for disabled parking was agreed as part of the budget setting process to ensure that income from parking charges is maximised. Charging for disabled parking is increasingly common in local authorities across the country. Normal charges are being introduced for Blue Badge holders from 3 April 2017 in all Waverley off-street car parks where charging applies. The possession of a Blue Badge is recognition of a physical disability and Waverley makes provision to assist those with physical disabilities by providing disabled parking bays convenient to locations people wish to go to and provide extra space to enable them to get in and out of their vehicles. We have also recognised the difficulties that some people with disabilities may experience using the parking facilities, and for this reason we are offering permits for free of charge parking to residents who are in receipt of the higher level of Personal Independence Payments (PIP), Disability Living Allowance (DLA), or Attendance Allowance.

The Blue Badge is not an indication of financial hardship but we do recognise that some Blue Badge holders may also be suffering from financial hardship. For this reason we have introduced a scheme where Blue Badge holders that also receive income related benefits will continue to be able to park for free. They just need to apply for one of our new permits and display this in their front windscreen alongside their Blue Badge. The permit is no different from other permits issued by the Council in a range of colours and there will be nothing on it to indicate it relates to financial hardship. It will simply have the Blue Badge number (instead of a registration number, and an expiry date to match that on the Blue Badge.

There is also on-street parking available for Blue Badge holders free of charge in Waverley, and the Borough is covered by use of the pay by phone service for customers

who have a mobile phone (not just a smart phone), so that use of the pay and display machines is not necessary.

In order to ensure that people are aware of the changes to the scheme Waverley has carried out the following actions:

- Issued press releases, placed an article on our website, and placed notices on the notice boards and pay and display machines in car parks at the beginning of March;
- Additional posters were put up in car parks in the week of 23 March in front of disabled spaces and at pedestrian entrances/exits;
- Sent information emails to voluntary sector organisations to inform them of the scheme so that they could pass the information on;
- Contacted Surrey County Council's Blue Badge team but they were not able to send any information out on our behalf, but they did agree to brief their call centre.
- Enforcement contractor has been placing leaflets on vehicles displaying blue badges for several weeks to give them advance notice of the introduction of charges whilst patrolling car parks;
- Permit application form is live on website, and was publicised on Council's homepage.
- Enforcement contractor has been instructed not to issue Penalty Charge Notices to vehicles displaying a blue badge. Instead they will be placing information about the new charges on the windscreen, advising blue badge holders that they now have to pay and also giving information about the permit scheme for persons in receipt of income related benefit.
- Updated our website and there is a page for disabled parking. A Frequently Asked Questions page has been added with questions
- Briefed the reception staff at The Burys regarding the arrangements and to refer any enquiries to parking@waverley.gov.uk

Who is affected by this policy/activity?

Customers using car parks who are in receipt of a blue badge- there are just over 4,000 blue badge holders in Waverley.

Who are the main people involved in this activity?

Waverley Borough Council's Parking Team
NSL enforcement officers

Is the responsibility for the proposed policy/activity shared with another department, authority or organisation? If so, what responsibility and with whom is it shared?

The responsibility for the policy lies directly with Waverley, however, NSL, the Council's enforcement contractor, will be responsible for ensuring the policy is adhered to.

Section 2 - Information Gathering and Consulting Stakeholders

It is important to consider all available information that would help determine whether the policy/activity could have any potential adverse impact. Data can be statistical information from formal audits, consultation exercises and surveys, service performance information, workforce profiles, local population and census data. For example, the data may show that a particular group of people are not accessing the service. Where data by protected characteristic group is limited or not available, assessors should identify this as a limitation and devise action plans to overcome this.

You can also find useful data on [Surrey-i](#)

The Council works with a number of groups who represent a variety of protected characteristics. It is important to engage and consult with these groups as they will be able to give you an informed perspective on the activity you are proposing. If you don't carry out consultation before decisions are made, the Council may be at risk of being challenged.

Do you have any monitoring data available on the number of people (from protected characteristic groups) who are using or are potentially impacted upon by your policy/activity?

The Parking Team have also carried out surveys of the number of disabled bays available in car parks, and the number of blue badges being used in the car park at any one time (as blue badge holders can park in other spaces too). The survey results confirmed that on average we have supplied the number of bays which match the usage in any given car park.

If monitoring has NOT been undertaken specify the arrangement you intend to make; if not please give a reason for your decision.

N/A

What research or consultation has been undertaken to understand the impacts of the strategy/policy/procedure/project/function?

Consultation was carried out with the Disability Alliance Network (DAN) and the Surrey Coalition of Disabled People, who are the umbrella groups representing disabled people in Surrey. The following details their Feedback and suggestions:

- Some parking machines need modifications to kerbing to provide for wheelchair access. (It was pointed out however that most wheelchair users would probably qualify for an exemption under the new criteria).
- Priority would be given to modify at least one P&D machine base in each car park nearest to the P&D machines first and then review the situation.
- First hour free – Some local authorities, (Epsom & Ewell for example) offer 1 hour free parking provided they pay for at least one hour. (i.e. they get one hour's parking added to the period paid for).
- People non resident in the Borough – There was a strong view from DAN that there should be some accommodation of persons who live just outside of the Borough but regularly shopped and used car parks in Waverley.
- Text Messaging for Ringo – We agreed to consult Ringo on whether text messaging to pay was possible for those without a smartphone who are hard of hearing / deaf.
- Prepayment methods – possibility of introducing prepayment such as virtual permits or

scratch cards.

In addition to this interim consultation, we have also been in further discussions with the DAN relating to the accessibility of machines, and it is proposed to continue to consult with these umbrella groups relating to reasonable adjustments that the Council will put in place.

Complaints to the Council's Parking Team (55 formal complaints received) have also been logged and the subjects are summarised as follows:

- Which income related benefits eligible for a permit
- Financial discrimination against a vulnerable sector – easy targets for income
- Discrimination in terms of lack of choice of using cheaper car parks further from the town centre
- Discrimination in terms of transport options to car parks (driving may be only practical option, which limits financial options)
- Discrimination in terms of least mobile
- Higher levels of PIP, Attendance Allowance, DLA don't incorporate all of those with mobility concerns
- Disabled users are slower to achieve tasks or have to use several car parks– therefore, pay more.
- Some suggested a paid permit at discounted rate compared to standard permit
- P&D machines aren't accessible by wheelchair users
- P&D locations aren't close enough to disabled bays
- Terminally ill patients undertaking doctors' appointments – "mean spirited" to charge for parking.
- RingGo has an associated fee – forced to pay more if can't access machine
- Out of borough rule is unfair. Particularly if Waverley towns/ shops are closest to home

Feedback has also been received from Parkinson's' UK as follows:

- People with Parkinson's are often assessed incorrectly for PIP and therefore do not receive the higher rate. Many appeals are being awarded in the claimant's favour. However, based on the scheme in place people with Parkinson's may not currently be in receipt of the higher rate mobility component of the benefit.
- People with Parkinson's may experience difficulties using the machines due to their problems with dexterity.

Section 3 – Assess the Impact on Protected Characteristic Groups

Assess the potential impact that the policy/activity could have on each of the protected characteristic groups and evidence these in the reason column. The potential impact could be negative, positive or neutral. If you have assessed negative potential impact for any of the target groups you will also need to assess whether the negative potential impact is high or low.

The analysis should consider how the policy, function or service will:

- Advance equal opportunities
- Eliminate discrimination; and
- Foster good relations between people that share protected characteristics and those that do not.

Also remember to consider the impact of our services on the life chances for all of those in our communities.

Consider the following: physical access, location, geography, poverty,

deprivation and social exclusion issues, employment, accessible communications issues.

Direct discrimination; does the strategy, policy etc intentionally exclude a particular equality category? Is it justified?

Indirect discrimination; does this strategy/policy/function affect some equality categories disproportionately? Is this justified? Is the policy/activity or its outcomes (such as the services provided) likely to be equally accessed by all?

Are there barriers that might inhibit or restrict access to the service for some people?

	Positive impact (it could benefit)	Neutral	Negative impact (it could disadvantage)	Reason
Sex				
Women	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>High Low</i> <input type="checkbox"/> <input type="checkbox"/>	The policy does not affect people based in gender.
Men	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>High Low</i> <input type="checkbox"/> <input type="checkbox"/>	The policy does not affect people based in gender.
Gender Reassignment				
Transgendered Men/Women	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>High Low</i> <input type="checkbox"/> <input type="checkbox"/>	The policy does not affect people based in gender.
Race The categories used in the Race section are those used in the 2001 census. Consideration should be given to the needs of specific communities within the broad categories.				
Asian	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>High Low</i> <input type="checkbox"/> <input type="checkbox"/>	The policy does not impact people based on race.
Black	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>High Low</i> <input type="checkbox"/> <input type="checkbox"/>	The policy does not impact people based on race.
Mixed race	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>High Low</i> <input type="checkbox"/> <input type="checkbox"/>	The policy does not impact people based on race.
White	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>High Low</i> <input type="checkbox"/> <input type="checkbox"/>	The policy does not impact people based on race.
Chinese	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>High Low</i> <input type="checkbox"/> <input type="checkbox"/>	The policy does not impact people based on race.
Gypsy, Roma, Traveller	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>High Low</i> <input type="checkbox"/> <input type="checkbox"/>	The policy does not impact people based on race.
Other racial or ethnic groups - specify	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>High Low</i> <input type="checkbox"/> <input type="checkbox"/>	The policy does not impact people based on race.
Disability Long term health impairment could include, mental health problems, asthma, heart conditions, chronic fatigue etc.				

	Positive impact (it could benefit)	Neutral	Negative impact (it could disadvantage)	Reason
Physical	<input type="checkbox"/>	<input type="checkbox"/>	High Low <input checked="" type="checkbox"/> <input type="checkbox"/>	Some disabled people will be in receipt of blue badges and will have received free parking until now. Permits are available if customers are on a benefit relating to their disability or an income related benefit. There may be some people who are entitled to this but do not claim the benefits, and therefore there could be a low impact.
Sensory	<input type="checkbox"/>	<input type="checkbox"/>	High Low <input checked="" type="checkbox"/> <input type="checkbox"/>	As above
Learning	<input type="checkbox"/>	<input type="checkbox"/>	High Low <input checked="" type="checkbox"/> <input type="checkbox"/>	As above
Long Term Health Impairment	<input type="checkbox"/>	<input type="checkbox"/>	High Low <input checked="" type="checkbox"/> <input type="checkbox"/>	As above
Sexual orientation				
Heterosexuals, lesbians, gay men and bisexuals	<input type="checkbox"/>	<input checked="" type="checkbox"/>	High Low <input type="checkbox"/> <input type="checkbox"/>	The policy does not impact people based on sexual orientation.
<i>Age</i>				
Older people	<input type="checkbox"/>	<input type="checkbox"/>	High Low <input type="checkbox"/> <input checked="" type="checkbox"/>	Some disabled people will be in receipt of blue badges and will have received free parking until now. Permits are available if customers are on a benefit relating to their disability or an income related benefit. There may be some people who are entitled to this but do not claim the benefits, and therefore there could be a low impact.
Younger people and children	<input type="checkbox"/>	<input checked="" type="checkbox"/>	High Low <input type="checkbox"/> <input type="checkbox"/>	No impact on younger people as the majority will not be driving.
<i>Religion or belief</i> Faith or belief groups cover a wide range of groupings, the most common of which are Buddhists, Christians, Hindus, Jews, Muslims, and Sikhs. Consider faith or belief categories individually and collectively when considering positive and negative impacts.				
Faith or belief groups	<input type="checkbox"/>	<input checked="" type="checkbox"/>	High Low <input type="checkbox"/> <input type="checkbox"/>	The policy does not impact people based on religion.
<i>Pregnancy and Maternity</i>				
	<input type="checkbox"/>	<input checked="" type="checkbox"/>	High Low <input type="checkbox"/> <input type="checkbox"/>	The policy does not impact people based on whether they are pregnant.

	Positive impact (it could benefit)	Neutral	Negative impact (it could disadvantage)	Reason
<i>Marriage and Civil Partnership</i>				
	<input type="checkbox"/>	<input checked="" type="checkbox"/>	High <input type="checkbox"/> Low <input type="checkbox"/>	This policy does not impact people based on their marital status

If you have indicated there is a potential negative impact on any group, are these intentional and of a high impact?

Intended – i.e. can be justified in terms of legislation

e.g. concessionary fares for over 60s

Yes No

High Impact? – i.e. it is or may be discriminatory against some groups

Yes No

If there are no potential negatives impacts on any groups go to section 6.

Section 4 - Consider Alternatives or Changes

Please see table at **Annexe 1** for assessment of impacts and consideration of mitigations or alternatives

Form version 4

If the research or consultation shows that the policy is likely to have an adverse impact, you must consider how to address this. Before making a decision, it is important to make sure that reducing the adverse impact on one particular group does not create an adverse impact on another group.

Further guidance

If you need more advice and guidance, you may find the following sources useful:

- [Government Equality Office: Equality Act guidance](#)
- [Equality and Human Rights Commission; Public Sector Duty](#)
- [Equality and Human Rights Commission: *Guidance on the Equality Duty*](#)
- [Equality and Human Rights Commission: *Making fair financial decisions*](#)
- [Equality and Human Rights Commission: *Meeting the Equality Duty in policy and decision making*](#)
- [TUC: *Equality Toolkit*](#)

Appendix 1- Impact Mitigation Table

This table provides a summary of the key feedback points received via the consultation and the mitigations that are in place or could be considered to minimise the impact of this policy.

Impact Summary	Suggested mitigation	Feasibility
<p>Accessibility of pay and display machines, both in terms of mobility and dexterity. The distance to P+D machines was also mentioned, although people with mobility issues and in receipt of the higher rate PIP, DLA or Attendance Allowance would receive a permit.</p>	<p>Most wheelchair users would probably qualify for a permit under the new criteria- this was confirmed by the DAN.</p> <p>Priority would be given to modify at least one P&D machine base in each car park nearest to the P&D machines first and then review the situation. A site survey has already been carried out to show where dropped kerbs, or where ramps can be put in place to provide easier access, particularly for disabled people who require use of a wheelchair.</p> <p>In terms of dexterity to use the machines, Waverley are improving the range of payment methods in the busiest car parks across the Borough. The use of contactless may make the use of machines easier for some customers.</p> <p>The Ring-go service is available across the Borough if this is easier than using machines for a growing number of customers. To assist disabled drivers, additional signage will be provided close to disabled bays with details of the pay by phone service.</p> <p>DAN suggested ensuring availability of paying for parking by text message via the Ring-go service, for customers who are hard of hearing and don't have a smartphone (already in place)</p> <p>The Council could continue to explore alternative</p>	<p>There is a financial impact of these adaptations of around £16,000, however, this is a feasible option to ensure accessibility of the machines.</p>

	payment options to further improve accessibility as new technology advances and methods come forward in the industry.	
Higher levels of PIP, DLA and Attendance Allowance do not cover all customers who may need a permit. In particular this relates to Attendance Allowance, which does not assess mobility.	There is potential to widen the criteria for permits to include lower levels of one or all of these benefits.	This is likely to come at high cost to Waverley as it will reduce the amount of income received through the scheme. There could be significantly higher permit applications received.
People non resident in the Borough may be disadvantaged– There was a strong view from DAN that there should be some accommodation of persons who live just outside of the Borough but regularly shopped and used car parks in Waverley.	Have a radius area around the Borough to allow permits for people who have their nearest shopping area/doctors etc. in WBC	This would represent a significant loss of income for any charging arrangement for Blue Badge holders, but is difficult to fully quantify as there is no certainty about how many people would be regular users and would apply for free permits.
Costs more to use the Ring-go service (19p per transaction)	This can't be mitigated other than by the use of pay and display machines.	There is a transaction fee which is made by the Ring-go provider. Therefore Waverley cannot affect this.
Disabled customers may pay more- Lack of choice to use cheaper out of town parking if disability doesn't allow them to walk far. Additional time may be needed as disabled customers may be slower to complete tasks, or will need to use several car parks.	<p>If customers receive benefits at the higher level relating to their disability or if they receive income related benefits they will qualify for a permit to exempt them from paying.</p> <p>There were suggestions to allow the first hour for free for disabled customers</p>	<p>The current permit scheme is already in place to mitigate some of these impacts.</p> <p>Waverley has considered the implementation of a free first hour- we could do so on the basis that people buy at least one extra hour and present a P+D ticket (we would ask the enforcement contractor not to issue tickets until an hour after the expiry time for people with blue badges displayed).</p>

Disable Parking Charges	Pay and display	Barrier controlled car park	On street parking	How they charge?	Do they have concession scheme?
SURREY					
Guildford	Free parking and no time restriction for blue badge holders	Disable badge charges apply within all car parks		Driver to pay at a payment machine before returning to their vehicle.	
Woking	Free parking and no time restriction for blue badge holders	Concessionary parking in town centre. Proximity Card will open the entry and exit barriers	Park on single and double yellow line up to 3 hours	Driver to pay at a payment machine before returning to their vehicle.	Blue badge holders can apply for the proximity card which will open the entry and exit barriers
Surrey Heath	Free parking and no time restriction for blue badge holders	Normal charges apply in barrier controlled		Driver to pay at a payment machine before returning to their vehicle.	
Tandridge	Free parking and no time restriction for blue badge holders				
Elmbridge	Free parking and no time restriction for blue badge holders				
Epsom and Ewell	Disable badge charges apply within all car parks, but 1st hour is free	Disable badge charges apply, but you can apply for the blue badge parker cards to receive 1 hour free		Visiting pay station or machine, but you can pay with the Blue Badge parker card	All disable badge holders can apply for the blue badge parker card to give you the first hour free, enter and exit car parks, pay the free for each visit or to be used a pre-paid top up card
Mole Valley	Free parking and no time restriction for blue badge holders				Residents who are temporarily disabled can apply for a Temporary Disability Permit for £20 valid for six months. Also there is a low paid worker parking permit for everybody
Spelthorne	Blue badge are charged the same tariff charges, however, in pay and display car parks an extra 1 hour is added to their purchased expiry time				Pay and display car parks get an extra hour for free
Runnymede	Free parking and no time restriction for blue badge holders		Blue badge holders can park on yellow lines and in parking bays during the restricted times		
Reigate and Banstead	Free parking and no time restriction for blue badge holders		On yellow lines there is a 3 hour limit.		

HAMPSHIRE

Gosport	All car parks are free to blue badge holders				
Fareham	All car parks are free to blue badge holders	Blue badge holders must pay. But if you leave in the Borough of Fareham you can apply for the SWIPE CARD for free entry and exit		Driver to pay at a payment machine before returning to their vehicle.	Swipe Card - free entry and exit in pay on foot car parks. If you have a blue badge holder and live in the Borough of Fareham. Also you can get resident parking for free
Winchester	Free of charge up to the stated car park time limits				
Havant	All car parks are free and no time restriction				
East Hampshire	Free for blue badge holders				
Hart	Free for blue badge holders		You can park in on-street parking spaces free-of-charge in appropriate locations without any restrictions as long as you display a valid blue badge.		
Rushmoor	Blue badge holders have to pay parking charges, but when you display your ticket you receive double the amount of time that you have paid.			Pay and display ticket	Blue Badge holders receive double amount of time, pay and display ticket.
Basingstoke and Deane	All car parks are free and no time restriction		Single and double yellow lines up to three hours.		
New Forest	Disabled Badge Holders Free				
Southampton	Free designated blue Badge parking		Up to three hours in double yellow line		
Portsmouth	All car parks are free and no time restriction				

EAST SUSSEX					
Hastings	Up to three hour's of free parking for disable badge holders within car parks and restricted to the disable bays only				
Rother	No General concession exist for blue badge holders but special permits may be available				Concessionary Permit : 1) Current recipient of the higher rate mobility or enhanced rate mobility component from department of work and pensions or personal independence payment, higher rate mobility from the department of work and pensions 2) Registered blind 3) People with a car or trike issued under the pre-1976 invalid vehicle scheme 4) Current recipients of the War pensioners mobility supplement.
Wealden	Majority of car parks are free but two are chargeable. No concessions for Blue Badge holders.				
Eastbourne	Free parking available in the Council car parks but be aware there is a time limit of 2 hours in the Hyde Gardens off-street parking area.	The multi-storey car parks (Arndale, Junction Road, Trinity Place) do charge for all vehicles but the Arndale Centre is free for all on Sundays. In other car parks be sure to read the information signs.	Blue Badge bays in the town centre there is usually a three hour time limit		
Lewes	Disabled Blue Badge holders may park free of charge in any of our Pay and Display car parks for a limited period. Most of our sites have designated Disabled Bays but any bay can be used without charge if these are all occupied or none are designated.				
City of Brighton and Hove	There are nine car parks that don't charge for blue badge holders for parking.				

WEST SUSSEX					
Adur	Most council run car parks have specially allocated disabled persons spaces in which holders can park all day providing a valid blue badge is displayed. If these spaces are full, any other space in the pay and display car parks can be used free of charge provided:		Blue badge holders can also park in on-street limited waiting bays and in on-street pay and display bays all day providing the valid blue badge is correctly displayed.		
Chichester	Most of Chichester District Council car parks have specially allocated parking bays. If these bays are full, any other pay and display bay in the car parks can be used free of charge provided.				
Crawley	Blue Badge holders and motorcycles are not required to pay and display. All the parking have height restriction barriers of 2.0 meters.				
Horsham	Parking for Blue badge holders within Town Centre Car Parks is free if you are in receipt of the higher rate mobility component of the disability allowance				if you are in receipt of the higher rate mobility component of the Disability Allowance also known as Personal Independence Payment (which started to replace disability living allowance from 8 th April 2013). Smart Park Blue Badge Scheme to register your vehicle for the new scheme
Mid Sussex	Free of charge.. If no disabled bays are available, the vehicle may use a regular pay and display bay without charge		On yellow lines for three hours with the parking clock clearly displayed and set to the time of arrival		
Adur and Worthing	Pay and display bays or meter parking bays without time limit and without charge		in designated disabled parking bays for an unlimited time with the disabled badge clearly and correctly displayed, for up to 3 hours on a single or double yellow line with the blue badge correctly displayed and the clock set to show the time of arrival		

Disabled Parking charges: Surrey, Hampshire, East Sussex and West Sussex

Surrey

Guildford Borough Council

Blue badge holders may park free of charge and without time limit in any of Guildford Borough Council's pay and display car parks. Blue badges holders are not allowed to park in any of the **pay on exit car parks** without paying the normal car parking charges.

Woking Borough council

Park in pay and display and voucher parking bays, **without payment**, for an unlimited period.

Concessionary parking in town centre: WBC offers Blue Badge Holders concessionary parking in Town Centre car parks and proximity card is provided that will open the car park barriers on entry and exit. The registration is free for residents living in the Borough. For those living outside the borough there is a charge of £50 per year.

Surrey Heath

In open access surface car parks, Blue Badge holders may park for **free** in any bay with no time limit.

Normal charges apply in barrier controlled (pay on foot) car parks in Camberley Town Centre, although there are wider bays reserved for Blue Badge holders.

Tandridge District Council

Disable parking is **free and no time restriction**. Ticket is not required if blue badge is displayed. This applies to any bay in the car park as well as to the bays supplied for blue badge.

Elmbridge Borough Council

All car parks offer **free** parking for Blue Badge holders.

Epsom and Ewell

Disable badge charges apply within all our car parks. During charging hours in our pay and display car parks, a blue badge holder is entitled to **one hour's free parking subject to payment to the minimum fee**. If you wish to stay for two hours in the car park you must purchase a pay and display ticket for one hour and display this alongside your blue badge. Barrier controlled car park – in order to receive the same discount you must apply for the **blue badge parker card**. This card can be used to enter and exit the car parks, pay the fee for each visit or be used as pre-paid top up card allowing you to make multiple visits to the car park without the need to visit the pay station.

This blue badge can be used in Ashley Centre, Hook Road car park, Hope Lodge and the car park to the rear of town Hall.

Mole Valley

Free parking for blue badge holders and no time restriction.

Residents who are temporarily disabled, for example awaiting a hip replacement, can apply for a Temporary Disability Permit for a small fee, entitling them to park in

Mole Valley District Council (MVDC) owned car parks free of charge. Please note, temporary Disabled Permits are not valid anywhere on-street. Temporary Disability Permit to anyone who is eligible and wants to purchase this permit. There is a **£20 fee payable** when applying for the Temporary Disability Permit. The permit will be issued for a six month period and cannot be renewed beyond six months.

There are several parking permits such as Low paid worker parking permit or temporary disability parking permit.

Spelthorne

Blue badge holders **are charged the same tariff charges**, however, in pay and display car parks an **extra 1 hour is added to their purchased** expiry time by the enforcement officers when patrolling. You can pay on machine or RingGo.

Runnymede

Free parking for blue badge holders. Blue badge holders can park on yellow lines and in parking bays during the restricted times, as long as they follow the rules for blue badge holders.

Reigate and Banstead

In Reigate and Banstead all car parks are **free** to blue badge holders and on yellow lines there is a 3 hour limit. The only exceptions to this rule are Derby Day at the Mound, Tattenham Corner car park. Every council car park has a number of spaces reserved for vehicles displaying the disabled badge.

Hampshire

Gosport

Free parking for Blue badge holders for unlimited time.

Fareham

If you are a blue badge holder, you can park **free in all pay and display car parks** by displaying clearly your badge in your parked vehicle, with the valid serial number and expiry date clearly displayed.

In pay on foot car parks, blue badge holders must pay. If you are a blue badge holder who lives in the Borough of Fareham, you can apply for a **swipe card** for free entry and exit in pay on foot car parks.

To apply for a swipe card as a resident of the Borough of Fareham bring your blue badge and proof of address.

Winchester

Disabled Parking Badge holders may park in any **pay and display car park** free of charge up to the stated car park time limits (badge must be displayed). Winchester City Council does however provide disabled bays within all our car parks and offers **some additional parking concessions**.

Havant

Disabled parking spaces are reserved for official badge holders 24 hours a day and 7 days a week. **There is no charge for disabled drivers displaying the official badge.** However users are asked to follow the guidance within their blue badge booklet for advice on their use.

Please note that a disabled parking bay is available for use by any blue badge holder and is not reserved for the sole use of any one person. There is currently no charge for this service and bay markings are provided free of charge.

Hart

Free for blue badge holders. You can **pay coin or mi permit. We are currently in the process of upgrading our ticket machines to offer 'wave and pay' and 'check in/check out' parking payment options.**

Rushmoor

All blue badge holders have to pay parking charges in our car parks. This change came into effect on 1 November 2014. You can park in on-street parking spaces free-of-charge in appropriate locations without any restrictions as long as you display a valid blue badge.

If you are a blue badge holder, you have to pay parking charges when using one of our car parks. **If you display a valid blue badge with a pay and display ticket, you can receive double the amount of time that you have paid for on certain tariffs.** If you have a blue badge, you can park in any marked disabled bays. You can also park in any ordinary bay and still receive the extra time.

If you have a blue badge, you can park in designated parking bays throughout Aldershot and Farnborough and, in some circumstances, park on single or double yellow lines.

The changes do not affect on-street parking. If you are a blue badge holder, you can continue to park free-of-charge in appropriate locations for as long as you like.

Basingstoke and Deane

In a blue badge holders bay or a pay and display bay in a council car park. Parking is free, and there is no limit to the length of stay. in on-street marked disabled bays in Church Street, Clifton Terrace and in front of The Anvil.

You can park on single yellow lines on roads (**but not in car parks**), for up to three hours, except where you could cause an obstruction. On double yellow lines on roads (but not in car parks), for up to three hours, except where you could cause an obstruction or where there is a loading ban (indicated by kerb markings and signs).

Test Valley

Test Valley Borough Council provide **free parking for blue badge holders within our Pay & Display car parks.**

New Forest

Disable badge holders free.

Southampton

Free designated blue badge parking can be found at most Southampton city centre council car parks, and in any of Southampton's on-street designated parking bays. If there are no designated parking bays available at your chosen car park you may park in any pay and display parking bay without time limit.

A parking fee is payable in the Grosvenor Square, Marlands, Eastgate Street and Bedford Place multi-storey car parks.

There is no time limit on parking in a disabled or pay and display bay. Your handbook gives you more information on using your badge.

Portsmouth

All blue badge holders may park in any Portsmouth City Council run car park or pay and display area for as long as required and free of charge.

East Sussex

Hastings

Up to three hour's of free parking for disable badge holders within car parks is restricted to the disable bays only. Drivers must display the blue bay and set the clock at time of arrival, when park within this bays. Elsewhere in the car park, all drivers must pay and display.

Rother

NO general concessions exist for blue badge holders but special council permits may be available. Dedicated parking bays in its "Pay and Display" car parks for use by Blue badge holders, there is however a need to purchase a pay and display ticket from the machine. If you are registered as disable and in receipt of one of the following you may qualify for a concessionary permit.

The concessionary permit:

- Current recipient of the higher rate mobility or enhanced rate mobility component from department of work and pensions or personal independence payment, higher rate mobility from the department of work and pensions
- Registered blind
- People with a car or trike issued under the pre-1976 invalid vehicle scheme
- Current recipients of the War pensioners mobility supplement.

Wealden

Wealden District Council operates a policy of '**No Concessions' for Blue Badge Holders**'. The majority of Wealden District Council **car parks are free of charge and there is no charge to Blue Badge Holders**. There are 2 car parks which are chargeable: Sea Road, Pevensey Bay and The Willows, Alfriston. As per the policy of 'No Concessions' Blue Badge Holders are expected to pay in these car parks.

Eastbourne

Free parking is available in the **Council car parks** but be aware there is a time limit of 2 hours in the Hyde Gardens off-street parking area.

People who qualify can use disabled parking bays and get a range of on-street parking concessions. **Parking is not always free or unlimited for Blue Badge holders**, so be aware of **local parking arrangements**. Some people can get a Blue Badge automatically others will have a further assessment where the local authority will look at the evidence of your disability to decide whether you will qualify. For **Blue Badge bays** in the town centre there is usually a **three-hour time limit**.

The **multi-storey** car parks (Arndale, Junction Road, Trinity Place) do charge for all vehicles but the Arndale Centre is free for all on Sundays. In other car parks be sure to read the information signs. Always place your blue badge and clock, set at the time of arrival, facing upwards on your dashboard so it can easily be seen and always remember

to read the road signage and markings before parking and leaving your car.

Lewes

Disabled Blue Badge holders may park **free of charge in any of our Pay and Display car parks for a limited period**. Most of our sites have designated Disabled Bays but any bay can be used without charge if these are all occupied or none are designated. You can pre-register with RingGo either by using the RingGo smartphone apps

City of Brighton and Hove

There are **nine car parks that don't charge for blue badge holders** for parking. Car parks throughout Brighton and Hove have different policies on disabled parking.

West Sussex

Adur District Council

Most council run car parks have specially allocated disabled persons spaces in which **holders can park all day** providing a valid blue badge is displayed. If these spaces are full, any other space in the pay and display car parks can be used free of charge provided. Blue badge holders can also park in on-street limited waiting bays and in on-street pay and display bays all day providing the valid blue badge is correctly displayed.

Chichester District Council

Most of Chichester District Council car parks have specially allocated parking bays free of charge. If these bays are full, any other pay and display bay in the car parks can be used free of charge provided. Blue badge holders can use any of the on-street voucher parking spaces or the specially allocated spaces adjacent to the pedestrian centre with no time limit or payment.

Crawley Borough Council

Blue Badge holders and motorcycles **are not required to pay and display**.

Horsham District Council

Parking for Blue badge holders **within Town Centre Car Parks is free if you are in receipt of the higher rate mobility component of the Disability Allowance also known as Personal Independence Payment** (which started to replace disability living allowance from 8th April 2013). **Smart Park Blue Badge Scheme** to register your vehicle for the new scheme.

Mid Sussex District Council

Drivers who hold a valid Disabled Badge are able to park in the following areas in Mid Sussex **free of charge** in all car parks. If no disabled bays are available, the vehicle may use a regular pay and display bay without charge.

In the village car parks, vehicles displaying blue badges (even if they are in a disabled bay) cannot stay longer than the maximum waiting time.

Adur and Worthing Borough Councils

Disabled drivers with **Blue Badges can park in designated disabled parking bays for an unlimited time** with the disabled badge clearly and correctly displayed. In pay and display bays or meter parking bays without time limit and without charge (if there are no

local Traffic Orders in force specifying a time limit) with the disabled badge clearly and correctly displayed,

For up to 3 hours on a single or double yellow line with the blue badge correctly displayed and the clock set to show the time of arrival, and where loading restrictions are not in force, and providing that the vehicle is not causing an obstruction (including at junctions, bus stops), or parked within 10 metres of a junction (as per 'The Blue Badge scheme: rights and responsibilities in England' booklet)