

## Section 4 Integrated Impact Assessment

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### Summary Report Template

Interim report		Final report	X
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#### 1. Title of proposal

'Delivering Actions for Parking – Supporting Information: Resident Parking Permits' paper.

This paper was formally titled 'Parking Action Plan – Resident Parking Permits', which was one of six Integrated Impact Assessment undertaken as part of drafting the Parking Action Plan to assess key, new action areas. Following the [Actions to Deliver Edinburgh's City Mobility Plan \(CMP\) consultation](#) in 2023, the draft Parking Action Plan was streamlined, along with draft Active Travel, Public Transport and Road Safety Action Plans, to respond to feedback on the challengingly large volume of information presented and resolve duplication.

This led to a more integrated 'CMP-led approach', which places greater reliance on the City Mobility Plan (CMP) '[Strategy to 2030](#)' and the associated '[Implementation Plan](#)' in setting out the strategic vision, objectives, policy measures, targets, and actions and associated delivery information. Further explanation on the CMP-led approach is set out in the 'City Mobility Plan – 1<sup>st</sup> Review' committee report, [presented to the Council's Transport and Environment Committee on 1 February 2024](#).

#### 2. What will change as a result of this proposal?

The CMP underwent a detailed Integrated Impact Assessment process as part of its creation and was approved in February 2021. The CMP Integrated Impact Assessment (IIA) is presented [here](#).

This 'Delivering Actions for Parking – Supporting Information: Resident Parking Permits' paper focusses on providing further detail on the action required to deliver the objectives, policies measures and targets in the CMP in relation to car clubs and builds on commitments already approved in CMP. This IIA should therefore be read in conjunction with the overarching CMP IIA, as well as the other accompanying Delivering Actions for Parking IIAs, which collectively assess many of the key impacts of parking actions required to deliver CMP.

#### Proposal overview

*Continue to apply parking permit surcharges to households that own more than one vehicle and more polluting vehicles and investigate the potential to reduce the number of residential parking permits issued.*

Reviewing pricing strategies will help to support the Council's City Mobility Plan and City Plan objectives. Parking permit pricing policy is an influential demand management tool

which can help to manage parking pressures, change travel behaviours, support sustainable mobility and help to tackle climate change.

### **3. Briefly describe public involvement in this proposal to date and planned**

The CMP was extensively consulted upon before its finalisation in 2021. Between April-July 2023, consultation was undertaken to gain views across the suite of draft action plans mentioned above, alongside an emerging Future Streets Framework (Circulation Plan) designed to further support the delivery of CMP. [Findings were presented](#) to the Transport and Environment Committee in October 2023.

A key focus of this consultation was engaging with groups with protected characteristics, including groups that have been flagged as potentially being affected by the public transport actions in this IIA. The consultation programme received a total of 3,827 representations, received via a range of activities including stakeholder workshops, focus groups, market research, an online survey, and public drop-in events.

Views were captured across the following key themes:

- Improving local travel for walking and wheeling
- Delivering a joined-up cycle network
- Delivering improvements to our public transport network
- Delivering a people-friendly city centre
- Achieving city-wide road safety targets
- Improving our public transport and active travel corridors
- Delivering vibrant shopping streets
- Delivering liveable neighbourhoods
- Supporting the journey to net zero and cleaner air.

Furthermore, engagement was undertaken for the draft Parking Action Plan with internal stakeholders, elected members and the city's Transport Forum stakeholder grouping in November 2021. The Transport Forum is made up of experts, citizens, business and academic interests and other interested parties, and was chaired by the Council's Transport and Environment Convener.

The findings from these consultations have been used to inform this IIA.

### **4. Is the proposal considered strategic under the [Fairer Scotland Duty](#)?**

Yes. This paper, when read in conjunction with CMP, will play a key role in the city's bid to tackle inequalities and will deliver a green, sustainable and more accessible form of transport to residents, commuters, businesses and visitors.

### **5. Date of IIA**

The IIA was finalised on 6 December 2023.

6. Who was present at the IIA? Identify facilitator, Lead Officer, report writer and any partnership representative present and main stakeholder (e.g. NHS, Council)

Name	Job Title	Date of IIA training
Steven Murrell (Lead officer)	Senior Transport Team Leader	
Gavin Sherriff	Senior Transport Team Leader	October 2018
Paul Bathgate	Transport Officer Parking Development	August 2021
Gavin Graham	Parking and Traffic Regulation Manager	
Joanne Yorkston (Facilitator and report writer)	Transport Officer Parking Contracts	June 2020
Janine Fawns	Transport Technician Parking Development	

7. Evidence available at the time of the IIA

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Data on populations in need	<a href="#">2011 Census - Office for National Statistics</a>  <a href="#">Scotland's Population - National Records of Scotland</a>  <a href="#">Scottish Index of Multiple Deprivation 2020 - Scottish Government</a>  <a href="#">Edinburgh Poverty Commission - Poverty in Edinburgh - data and evidence</a>	The City of Edinburgh has one of the fastest growing populations of any city in the UK and the city is projected to grow by a further 6.6% by 2026. Although the city centre has a lower share of its population over 65 years of age (12%), the wider city region has a significantly higher share (22%) than Edinburgh and Scotland (19%).
Data on service uptake/access	Data taken from NSL Apply (permit processing system)	CEC has more than 24,000 permits active at any one time.  This includes all CPZs and Priority Parking Areas

<b>Evidence</b>	<b>Available – detail source</b>	<b>Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal</b>
Data on socio-economic disadvantage e.g. low income, low wealth, material deprivation, area deprivation.	<p><a href="#">Scottish Government - Scottish Index of Multiple Deprivation 2020</a></p> <p><a href="#">Edinburgh Poverty Commission - Poverty in Edinburgh data and evidence</a></p> <p><a href="#">Scotland's Census 2011</a></p>	<p>Details provided include statistical data highlighting areas of poverty in Edinburgh.</p> <p>Some of the most deprived communities are in the peripheral areas of the city (e.g. Granton, Pilton, Niddrie, Saughton and Wester Hailes) outside the City Centre. However, an area within the CPZ in the Old Town is one of the top 20% most deprived areas in the country</p> <p>46% of disabled people don't have a car, 60% of low-income families don't have a car across Scotland. In Edinburgh, 40% of households don't have a car.</p>
Data on equality outcomes	None	
Research/literature evidence	<p><a href="#">The Transport Scotland Bill</a></p> <p><a href="#">The Highway Code - Waiting and parking (238 to 252) - Guidance - GOV.UK (www.gov.uk)</a></p>	<p>Transport Scotland consultation on Pavement Parking</p> <p>CPZ as defined by the highway code.</p>
Public/patient/client experience information	Members of the public and Councillors frequently ask for parking restrictions to be added, removed or altered across the CPZ. Requests are received online, via email, telephone and in person.	<p>Permit requests include;</p> <ul style="list-style-type: none"> <li>Apply for or renew a residents' or priority parking permit.</li> <li>Apply for or renew retail, trades and business permits.</li> <li>Apply for a visitors' parking permit.</li> </ul>

<b>Evidence</b>	<b>Available – detail source</b>	<b>Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal</b>
Evidence of inclusive engagement of people who use the service and involvement findings	<a href="#">The City of Edinburgh Council - Delivering the local transport strategy Parking Action Plan (2014-2019)</a>  <a href="#">The City of Edinburgh Council - City Mobility Plan IIA</a>	
Evidence of unmet need	None	
Good practice guidelines	<a href="#">City Mobility Plan 2030 - The City of Edinburgh Council</a>  <a href="#">The City of Edinburgh Council - Street Design Guidance</a>  <a href="#">Transport Scotland: Report on Public Electric Vehicle (EV) infrastructure in Scotland - Opportunities for Growth</a>  <a href="#">Traffic Signs and General Directions (TSRGD)</a>  <a href="#">Traffic Signs Manual - Chapter 3 (Gov.uk)</a>	Existing street design guidance for staff and the general public
Carbon emissions generated/reduced data	<a href="#">The case for electric vehicles   Local Government Association</a>	The environmental benefits and the groups of people likely affected are mentioned throughout the document
Environmental data	<a href="#">Air Quality Action plan – The City of Edinburgh Council</a>	Road transport produces 23% of all carbon dioxide (CO2) produced in Edinburgh (Source: DECC). It also produces harmful emissions (NOX and PM10) which contribute to poor air quality and severe health problems.

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
		<p>There are now six Air Quality Management Areas in Edinburgh, each centred around major traffic corridors.</p> <p>The Council has introduced a Low Emissions Zone and enforcement is expected to commence on 1 June 2024 in the city centre.</p>
Risk from cumulative impacts	<p><a href="#">Road Safety Plan – The City of Edinburgh Council</a></p> <p><a href="#">Active Travel Action Plan (2016) – The City of Edinburgh Council</a></p>	<p>Indiscriminate parking and increased traffic movements can negatively impact road safety. 75% of fatalities on Edinburgh's roads involve vulnerable road users such as; pedestrians, cyclists and children. The introduction of further parking restrictions will discourage unnecessary car travel, better protect cycle lanes and crossing points making Edinburgh's roads safer.</p>
Other (please specify)	None	
Additional evidence required	None	

**8. In summary, what impacts were identified, and which groups will they affect?**

Equality, Health and Wellbeing and Human Rights	Affected populations
<p><b>Positive</b></p> <ul style="list-style-type: none"> <li>Managing the number of permits in circulation by using pricing as a demand management tool should allow local residents to park closer to their homes.</li> <li>Emissions-based charging improves air quality by discouraging polluting vehicles within Edinburgh making the city a more pleasant place to live and work</li> </ul>	<p>Existing residents &amp; Young People</p>

<ul style="list-style-type: none"> <li>• Improved air quality will greatly help children and young people, as poor air quality can damage lung development and can result in breathing conditions such as asthma.</li> <li>• Permit charges, along with the cost of living crisis may make owning a vehicle too expensive which will result in increased use of public transport as well as walking, wheeling and cycling.</li> <li>• Residential parking permits will remain free of charge for people with a valid disabled persons' blue badge</li> </ul> <p><b>Negative</b></p> <ul style="list-style-type: none"> <li>• Large families with a requirement for two cars.</li> <li>• Students in an HMO flat share (private rent) can only obtain max of 2 permits.</li> <li>• Low income families unable to afford to change their vehicle to take advantage of cheaper permits prices.</li> <li>• All parking signage is in English, no alternative.</li> <li>• Literacy and numeracy understanding required to understand online system, times of operation and associated costs.</li> </ul> <p><b>Mitigation.</b></p> <ul style="list-style-type: none"> <li>• The Council offers the opportunity to merge two vehicles onto one permit. Although only one vehicle can park at any one time, this could assist in situations where one vehicle is away for most of the day.</li> <li>• The Council offers the opportunity to purchase 3 and 6 month permit durations, so less initial outlay when compared to the 12 month permit price.</li> <li>• CPZ signage is similar to that of the rest of the UK.</li> <li>• Four locality hubs are accessible across the city where residents can seek assistance with permit applications or gaining online access.</li> <li>• Learning to drive and purchasing, running and insuring a vehicle all require a good level of literacy and numeracy.</li> <li>• Parking Attendants patrolling parking bays both within and out of the Controlled Parking Zones offer a visual presence and additionally enhances fault reporting capabilities of the Council.</li> </ul>	<p>Disabled people</p> <p>Existing residents, students and people with protected characteristics.</p>
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<p><b>Environment and Sustainability including climate change emissions and impacts</b></p>	<p><b>Affected populations</b></p>
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<p><b>Positive</b></p> <ul style="list-style-type: none"> <li>• Interventions that reduce local air pollution are likely to generate a positive effect on reducing factors contributing to climate change through reduced greenhouse gas emissions.</li> <li>• Pricing will continue to focus on emission reductions and investigate emissions-based charging to incentivise and accelerate the use of low emission vehicles.</li> <li>• Reduce number of private vehicles in use.</li> <li>• Encourages active/public transport use.</li> <li>• Electronic permits are issued to residents reducing need for pre-printed stationery and postage. Low income families unable to afford to change their vehicle to take advantage of cheaper permits prices</li> </ul> <p><b>Mitigation</b></p> <ul style="list-style-type: none"> <li>• The Council offers the opportunity to purchase 3 and 6 month permit durations, so less initial outlay when compared to the 12 month permit price.</li> </ul>	<p>All</p> <p>Low income families</p>
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<p><b>Economic including socio-economic disadvantage</b></p> <p><b>Positive</b></p> <ul style="list-style-type: none"> <li>• Limited allocation of resident's permits (1 per person and 2 per household).</li> <li>• Cost of living crisis might mean a car and hence a permit are luxury items that are unaffordable. May reduce the number of private vehicles.</li> <li>• A residents' permit does not allow vehicles to enter the LEZ.</li> <li>• Blue Badge holders can apply for a free resident's permit as well as double the normal visitors parking permits allocation, at half the standard price.</li> </ul> <p><b>Negative</b></p> <ul style="list-style-type: none"> <li>• Cost of purchasing a resident's permit.</li> <li>• Cost of permits increase annually.</li> <li>• Student accommodation ineligible to purchase a resident's parking permit.</li> <li>• Private student HMO accommodation still limited to 2 permits</li> <li>• A residents' permit does not allow vehicle to enter LEZ</li> </ul>	<p><b>Affected populations</b></p> <p>Existing residents</p>
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<ul style="list-style-type: none"> <li>• In addition to the point above, some motorists parking in the city may already have higher incomes or existing wealth. This could mean that such people are less sensitive to price increases than others and there will be less of an impact on behaviour than expected. Alternatively, such people could buy EVs, which are generally more expensive to purchase than internal combustion engine vehicles, to obtain cheaper parking. This may be a loophole to bypass economic and equality aims of pricing policy.</li> </ul> <p><b>Mitigation</b></p> <ul style="list-style-type: none"> <li>• The Council offers the opportunity to purchase 3 and 6 month permit durations, so less initial outlay when compared to the 12 month permit price.</li> <li>• The Council offers the opportunity to merge two vehicles onto one permit. Although only one vehicle can park at any one time, this could assist in situations where one vehicle is away for most of the day.</li> <li>• Low emission vehicle owners are entitled to a reduced permit price with more polluting vehicles paying more.</li> <li>• While such people may continue to be able to drive into the city, evidence obtained as part of this IIA suggests that some of the most vulnerable people in our society (disabled and people on low-incomes) do not have access to a car. Overall, pricing and the other supporting measures from the CMP and actions within this plan (EVs, Parking Controls and Enforcement) should overall result in i) fewer vehicles and ii) cleaner vehicles coming into the city which will help to tackle deprivation and benefit everyone.</li> </ul>	<p>All, Disabled people, Older people, Families,</p>
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**9. Is any part of this policy/ service to be carried out wholly or partly by contractors and if so how will equality, human rights including children’s rights, environmental and sustainability issues be addressed?**

The Council’s parking enforcement contractor provides the permit processing system but all processing for residents’ permits is facilitated by the Council’s back-office Customer team. As part of the Council’s procurement process consideration is given to ensure equality, environmental and sustainability impacts when working on behalf of the Council.

**10. Consider how you will communicate information about this policy/ service change to children and young people and those affected by sensory impairment, speech impairment, low level literacy or numeracy, learning difficulties or**

**English as a second language? Please provide a summary of the communications plan.**

A range of communication methods will be used to reach out to different types of people at different stages of the delivery of actions, ensuring a broad audience reach and opportunities for interaction. Community involvement (listening and acting on stakeholders views) will remain a key element and communication formats will be designed to be understood by a range of population groups.

Residents are encouraged to use Council's translation service if they have language/visual requirements.

Another related parking action is the development of a Parking Communications Plan to increase awareness of parking operations, proposals and consultations whilst improving data gathering and customer insight.

**11. Is the plan, programme, strategy or policy likely to result in significant environmental effects, either positive or negative? If yes, it is likely that a Strategic Environmental Assessment (SEA) will be required and the impacts identified in the IIA should be included in this. See section 2.10 in the Guidance for further information.**

As part of the City Mobility Plan a Strategic Environmental Assessment (SEA) was carried out. The SEA concluded that the cumulative impacts of policies in the City Mobility Plan would generally be positive.

This paper's role is to support the overarching CMP.

**12. Additional Information and Evidence Required**

**If further evidence is required, please note how it will be gathered. If appropriate, mark this report as interim and submit updated final report once further evidence has been gathered.**

Additional evidence will be added to the IIA, if required, as it becomes available.

**13. Specific to this IIA only, what recommended actions have been, or will be, undertaken and by when? (these should be drawn from 7 – 11 above) Please complete:**

<b>Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)</b>	<b>Who will take them forward (name and job title)</b>	<b>Deadline for progressing</b>	<b>Review date</b>
None.			

**14. Are there any negative impacts in section 8 for which there are no identified mitigating actions?**

None – all negative impacts have been mitigated – see IIA checklist

**15. How will you monitor how this proposal affects different groups, including people with protected characteristics?**

Performance against CMP's Key Performance Indicators is measured every 2 years as part of its biennial review cycle.

**16. Sign off by Head of Service**

**Name Gavin Brown**

**Date 24/01/2024**

**17. Publication**

Completed and signed IIAs should be sent to [strategyandbusinessplanning@edinburgh.gov.uk](mailto:strategyandbusinessplanning@edinburgh.gov.uk) to be published on the IIA directory on the Council website [www.edinburgh.gov.uk/impactassessments](http://www.edinburgh.gov.uk/impactassessments)

**Edinburgh Integration Joint Board/Health and Social Care**

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