

EQUALITY IMPACT ASSESSMENT

Conversion of time-limited parking bays to cashless pay-bays

February 2025 (v1.0)



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1. What is the Proposal?

Background: Cashless Payments

In November 2019, it was agreed (report number ES19066) that delegated authority would be given to the Director of Environment & Public Protection for the removal of Pay and Display P&D machines across the Borough in consultation with the Portfolio Holder. Since this time, the Council have had 2 rounds of pay and display machine removals. Following this pilot rounds of removal underpinned by a full Equality Impact Assessment along with an extensive information campaign the P& D machines were removed and a cashless payment system implemented. Therefore, residents are familiar with using the cashless parking system which is also widely used throughout the UK

Conversion of time limited bays

The proposal relates to the conversion of time limited bays to cashless parking bays. Free-to-park time-limited bays have been used for decades across the Borough of Bromley to deter long-stay parking in areas where this is not desirable, such as near shops, where a regular turnover of parking is needed for customer parking. For many years there has been a level of abuse of such bays, which are very difficult to enforce when compared to all other regulated parking bays. Apart from the difficulty in enforcing time-limited bays, there is the issue that it costs the Council more to enforce the bays than other sorts of bays, yet there is no income generated to cover the cost of enforcement. not even from the issuing of PCNs (penalty charge notices) as successful PCNs are few and far between

Next Steps

A report (ES20471) is being presented on 13th March for pre-decision scrutiny by the Environment and Community Services Policy Development and Scrutiny Committee which recommends replacing free time-limited bays with cashless pay-bays, with a linear

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charge, as with many other on-street pay bays already in operation across the Borough. This will make enforcement more effective, straightforward and cheaper, plus will generate an income to the Council to contribute towards the cost of the parking contract and other traffic management requirements. The decision maker is Portfolio Holder for Transport, Highways & Road Safety.

2. What are the recommendations?

The recommendations are to approve a programme of change of regulation for time-limited parking bays to cashless pay bays, starting where there are most bays and where displacement is least likely and to approve the delegation of the programming for the changes to The Director of Environment & Public Protection in consultation with the Portfolio Holder for Transport, Highways & Road Safety.

The recommendations are to initially convert 262 spaces at 12 locations across the Borough which are Anerley Rd, Anerley (39), Croydon Rd/Upper Elmers End Rd Beckenham (32), Glebe Way West Wickham (16), High Street Penge (15), Main Rd Biggin Hill (41), Mottingham Rd, Mottingham (13), Petts Wood Rd, Petts Wood (15), Plaistow Lane, Bromley (11), Southborough Rd, Bickley (13), Upper Elmer Rd and Links Way, Eden Park (11), Windsor Drive, Chelsfield (39), Worsley Bridge Road Beckenham (17).

Rationale for short-stay parking controls:

Many parking spaces near to shops and other amenities are time-regulated to ensure a turnover of parking, to help make sure that there are parking spaces available. Other locations are more suited to longer term parking for commuters or residents to use. Some time-limited parking is free of charge, and some is chargeable. A maximum time of two hours is common, but this can be adjusted to suit the nature of the parking requirements for the amenity

Some Ward Members have raised concerns about the impact of the proposals on their residents to be able to afford to park in the parking bays identified for change. It is not unreasonable to charge for enforced parking on bays which were previously free, as there is a cost to the Council of regulating this, and the relatively small cost can be considered to be part of the larger cost of running a car, there are also free off street parking locations available within the Borough.

Although drivers will have to pay to park under the proposed arrangements, in locations where they may have previously been able to park for free, they are more likely to be able to find an available parking bay and the charges will not be high as linear charging will be available. For example, in most locations, the full cost to a driver to park for 20 minutes will be 50 pence; and £2 for 2 hours.

If we are to avoid the unrecovered cost to the Council of enforcing time-limited parking near to amenities, the only alternative to implementing charges is to remove the current free time-limited bays, which would not be appropriate as all-day parking would remove the availability of parking space.

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Each location has been or will be reviewed to see if implementing a fee could simply displace parking to adjacent kerb space with no parking controls which, especially for a small set of bays, might make charging inappropriate. The set-up cost to install required signs and lining for each site is about £500 to £1000, but there will be no RingGo set up costs.

Consultation

Consultation has been undertaken at a number of locations where there are currently free time-limited bays. The feedback from residents and businesses has been similar from the various locations. An example is the twenty-one-day consultation process that was undertaken relating to the proposal for conversion of time-limited parking to the cashless parking system in Petts Wood Road. The Petts Wood consultation generated a useful 79 responses and a consultation summary report has been completed (see *below*).

Petts Wood Proposed Conversion of Free Parking Bays to Pay-by-Phone Parking Report, February 2025

Overview

Letters were hand delivered to approximately 82 addresses on Petts Wood Road, BR5 on 21st January 2025 explaining the proposal to convert the time-limited free parking bays in Petts Wood Road to pay-by-phone (RingGo). Residents within the distribution area were invited to comment on the proposal within 21 days.

Distribution Area

The distribution area included all properties at

- *Numbers 130-198 Petts Wood Road, BR5*
- *Numbers 135-193 Petts Wood Road, BR5*

Results and Responses

- *The Transport Engagement Team received a total of 79 responses.*
- *Of these responses received only 15 (19%) came from residents/business owners within the distribution area.*
- *Of these 15 responses 1 resident (7%) was in favour of the proposal with 14 (93%) against.*
- *Of the total 79 responses 1 (1.3%) resident was in favour of the proposal with 78 (98.7%) against.*
- *The letter was widely shared on social media channels, and a petition was also received against the conversion of the bays.*
- *Recurrent topics received against the proposed scheme include:*
 - *Current scheme of two hours free parking currently works well and is invaluable – it is the only free parking in the area.*
 - *Paid for Parking will discourage people visiting the local shops in Petts Wood and encourage them to shop elsewhere e.g. Nugent Centre Orpington which offers 3 hours free parking.*
 - *Paid for parking will have a negative impact on local businesses as customers choose to shop elsewhere.*

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- *Footfall into local businesses has already fallen since the introduction of RingGo in Station Square – several spaces remain empty so no need to introduce additional paid for parking.*
- *Older generations struggle to use RingGo and/or don't own smart phones.*
- *Elderly are currently limited for parking in Petts Wood which doesn't involve RingGo to visit the local shops and restaurants. The free parking is a lifeline for the elderly.*
- *RingGo temperamental in this area, no option to pay with cash.*
- *Loss of business rates to Bromley Council as local businesses struggle for survival made worse by proposal.*
- *Mobility and accessibility issues if paid for parking is introduced for the access of healthcare facilities – H Williams & Associates Dental Practice*
- *Will become an issue for carers visiting several properties within the distribution area, several times a day.*
- *Feel it is unfair for friends/visitors visiting residential houses.*
- *Negative impact on surrounding roads, increase in congestion.*
- *Detrimental impact on local businesses, residents and vibrancy of the area*
- *Feel it is a money-making exercise.*
- *Several residents have asked if resident permits will become available if the proposed scheme goes ahead.*

Findings have been analysed and impacts considered within the EIA.

Benefits of Cashless payment system

- The cashless system allows for the customer to renew their parking session remotely, significantly reducing the risk for them receiving a Parking Charge Notice PCN.
- There will be no set up costs for the RingGo system as this is already in place
- Standardised approach with the rest of the Borough where cashless parking is in place
- London Boroughs who have already introduced the cashless system includes boroughs with the highest IMD (Indices of Multiple Deprivation) scores including Newham, Lambeth and Tower Hamlets where there may be a higher proportion of digitally excluded people.

Communication and engagement

Should the proposal pass scrutiny and the changes to time limited parking be implemented, local residents and other stakeholders will be informed of the changes so that they are aware that they will be required to pay for parking which is currently free. Residents will be updated on timescales for implementation.

3. Who is affected by the Proposal?

Identify the main groups most likely to be directly or indirectly affected by the recommendations.

Directly Affected Groups/Individuals

The proposal initially relates to 262 spaces at 12 locations across the Borough which are Anerley Rd, Anerley (39) , Croydon Rd/Upper Elmers End Rd Beckenham (32) , Glebe Way West Wickham (16), High Street Penge (15), Main Rd Biggin Hill (41), Mottingham Rd, Mottingham (13), Petts Wood Rd , Petts Wood (15), Plaistow Lane, Bromley (11), Southborough Rd, Bickley (13), Upper Elmer Rd and Links Way, Eden Park (11), Windsor Drive, Chelsfield (39), Worsley Bridge Road Beckenham (17). The function has a direct impact on drivers who use the time limited parking bays across the Borough though there is no data on usage of these bays.

The 2021 census data for car and van ownership in Bromley is detailed in below showing the number of residents who have access to cars/vans or to 1,2,3 cars/vans showing that car ownership is high in the Borough

- No cars or vans-22.9%
- 1 car/vans-46.4%
- 2 cars/vans -22.8%
- 3 cars/vans-7.9%

Indirectly Affected Groups/Individuals

The groups indirectly affected by the proposal are

- Bromley Residents, March 2021 census data confirmed the resident population of Bromley was 329,991, an increase of 34,459 on 2011 data.
- Businesses operating in the areas in which the time limited parking bays are located. Residents could seek alternatives with free parking. Effectively enforced time-limited bays allow for a turnover of parking which supports local businesses.

Age

Check box if impact identified

Check box if not applicable

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

The impact on older people was analyzed based on Bromley being identified as a Borough with an aging population and from data analysis. Key sources used to gather demographic data on all age groups including: the Office for National Statistics (ONS) 2021 Census data and its Nomis service, the Greater London Authority (GLA) and the Bromley Joint Strategic Needs Assessment (JSNA).

- JSNA 2021 data showed the proportion of older people in Bromley (aged 65 and over) is expected to increase gradually from 17.8% of the population in 2021 to 18.7% by 2025 and 20.2% by 2031.
- The pattern of population change in the different age groups is variable between wards
- The JSNA assessment projects that the number of people over 65 will increase by 18% by 2031.
- The JSNA projects that there would be a small decrease in the population aged 4 and under by 2031, however the population overall is projected to remain largely stable.

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

- Bromley has a higher-than-average number of residents aged 65+. There could be a disproportionate financial impact on older people aged 65+ paying to park in time limited bays that were previously free
- Older people could experience difficulties using the cashless parking system and may not have a smart phone
- Older people who do not have a bank account or own a credit or debit card will be unable to use the online payments service.

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

- Engagement with residents to notify them of the service change to parking at time-limited bays
- Signpost residents who may be digitally excluded without access to smartphones or computers to free facilities e.g. Bromley Libraries who have free computers and trained staff who can assist with facilitating a cashless payment transaction
- Residents of all ages have been successfully using the RingGo cashless payment system since it was introduced in 2022
- Elderly residents who are Blue Badge holders will be unaffected by the change as they can still park for free in these spaces.

Disability

Check box if impact identified

Check box if not applicable

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

As this proposal relates to various sites across the Borough, Borough wide data has been considered which shows that Bromley has Greater London's joint third lowest proportion of residents who identified as being disabled with limited activities. Further research identified that the top 5 causes of years lived with disability in Bromley has remained the same over the last ten years. This includes musculoskeletal disorders, mental disorders, other non-communicable diseases, neurological disorders, and diabetes & CKD. There has been an increased impact to years lived with disability caused by unintentional injury, digestive diseases, and nutritional deficiencies. There has been a decrease in the impact caused by chronic respiratory diseases, cardiovascular diseases and maternal & neonatal diseases. One of the main burdens of disability in Bromley is mental health disorders. The estimated prevalence of common mental health disorders in Bromley is 15.1% for 16+ years and 9.1% for 65+ years (PHE: Fingertips, 2017).

Analysis of the 2021 Census data shows that the percentage of people who were identified as being disabled and limited a lot under the equality act in Bromley decreased by 1.3 percentage points. These are age-standardized proportions which enable comparisons between populations over time and across geographies, as they account for differences in the population size and age structure. Other key statistics relating to disability include.

- In 2021, 5.7% of Bromley residents were identified as being disabled and limited a lot. This figure decreased from 7.0% in 2011.
- In 2021, just over 1 in 12 people (8.6%) were identified as being disabled and limited a little, compared with 8.9% in 2011. The proportion of Bromley residents who were not disabled increased from 84.1% to 85.7%.
- This means that Bromley had Greater London's joint third lowest proportion of residents who were identified as being disabled and limited a lot (alongside Kingston upon Thames). Across the region, only City of London (3.9%) and Richmond upon Thames (4.8%) had a lower proportion of residents who were identified as being disabled and limited a lot.
- The combined number of Borough residents with a disability who were limited a little and limited a lot was 14.3 %
- Bromley has a higher percentage of people providing 19 hours or less of unpaid care per week than the average of all local authorities in London.

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Statistics on parking badges for disabled people ('Blue Badges') in England are obtained from the Blue Badge Digital Service (BBDS) database. Analysis of Blue Badge holders Local Authority 2023 data produced by Department for Transport which shows that as of 31st March there were 11,000 blue badges issued by London Borough of Bromley representing 3.3 % of the population in Bromley with a 5.1 to 1 ratio of retired people to blue badge holders.

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

- People with disabilities who are not Blue Badge holders will have to pay to park at the time limited bays which are to be converted to the cashless payment
- Disabled people with no Blue Badge could experience difficulties using the cashless parking system and may not have a smart phone
- Disabled people with no Blue Badge who do not have a bank account or own a credit or debit card will be unable to use the online payments service

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

- Consultation and engagement to ensure all those with disabilities and other impacted groups are fully informed of the changes and supported in the transition to alternative provision.
- People with disabilities who have been issued with a blue badge will be unaffected by the service change as they will still be eligible to park for free at the sites affected by this proposal
- The implementation of charges will address the current misuse of the time limited bays increasing their availability
- Disabled people with no Blue Badge needing help accessing cashless payments will be signposted to assistance e.g. at libraries and the Council website
- See also the mitigating factors set out in the age category
- Residents who are in receipt of disability benefits receive them through their bank accounts

Pregnancy and maternity

Check box if impact identified

Check box if not applicable

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

The data in the EA template has been updated due to the availability of 2021 Census data. The number of live births in Bromley has been decreasing over the last few years.

- In 2008 there were 4,000 births in Bromley, which rose to 4,300 in 2016 but fell to 3,600 in 2020. In 2022, there were 3,431 live births in Bromley, England, and Wales. This is fewer than other London boroughs, including Newham (5,598), Croydon (4,872), and Barnet (4,621). Birth rates vary between wards.
- The highest rate is in Clock House and the lowest in Farnborough and Crofton. In 2021, 22.4% of households in Bromley included a couple with dependent children, an increase from 20.7% in 2011 but fell across England.
- In 2020, Bromley's rate of multiple births was 15.6 per 1,000 births, which is similar to London's 15.2 per 1,000 and slightly higher than England's 14.4 per 1,000.
- The population projections for children aged 0-4 years in Bromley are currently fairly static but are projected to fall in the mid-2020s
- Total fertility rate (TFR) by local authority district, England, and Wales, 2022 is 1.52% in Bromley compared to 1.62% in Bexley and 1.63% in Croydon.

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

No negative impacts identified for this category

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

N/A See the mitigation provided in the Age, Disability and Other Categories

Race

Check box if impact identified

Check box if not applicable

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

The 2011 and 2016 data set out in the EA template has been updated due to the publication of the 2021 Census data. Key changes are set out below:

- Major changes show 8.3% of Bromley residents identified their ethnic group within the "Asian, Asian British or Asian Welsh" category, up from 5.2% in 2011. The 3.1 percentage-point change was the largest increase among high-level ethnic groups in this area.
- In 2021, 76.5% of people in Bromley identified their ethnic group within the "White" category (compared with 84.3% in 2011), while 7.6% identified their ethnic group within the "Black, Black British, Black Welsh, Caribbean or African" category (compared with 6.0% the previous decade).
- The percentage of people who identified their ethnic group within the "Mixed or Multiple" category increased from 3.5% in 2011 to 5.4% in 2021.

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

No impact identified on this equality group.

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

N/A See the mitigation provided in the Age, Disability and Other Categories

Religion and belief

Check box if impact identified

Check box if not applicable

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

The most up to date 2021 Census data has been analyzed which shows an increase on the number of residents having no religion.

- In 2021, 37.3% of Bromley residents reported having "No religion", up from 26.0% in 2011. The rise of 11.3 percentage points was the largest increase of all broad religious groups in Bromley.
- In 2021, 48.3% of people in Bromley described themselves as Christian (down from 60.7%), while 6.4% did not state their religion (down from 7.8% the decade before).

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

No negative impact on this equality group.

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

N/A - See the mitigation provided in the Age, Disability and Other Categories

Gender/Sex

Check box if impact identified

Check box if not applicable

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

The latest 2021 Census data shows Bromley has 13,500 more females than males, the Borough sex ratio is calculated at 92.0 males to every 100 females. Refer also to the gender re-assignment section.

- The population of Bromley is closely split as follows with 52% female and 48% male.
- The 2021 census also found that 2.7% of people aged 16 and over in Bromley identify as LGB+, which stands for gay or lesbian, bisexual, or other sexual orientation.
- In terms of gender identity, the 2021 census found that 0.07% of people in Bromley identify as trans women, which is the lowest percentage in London.

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

No negative impact on this equality group.

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

N/A See the mitigation provided in the Age, Disability and Other Categories

Sexual Orientation

Check box if impact identified

Check box if not applicable

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

The 2018 data in the EA template has been considered along with newer 2021 Census data and APS data which shows the sexual identities of residents. In the 2021 census, Data in this section are only available at local authority level. For smaller areas, such as wards or super output areas, data for the corresponding local authority is shown. 2.7% of people aged 16 and over in Bromley identified as LGB+, gay or lesbian, bisexual, or other sexual orientation. This is lower than the percentages in other Southeast London boroughs, such as Lewisham (6.1%) and Greenwich (4.5%). 5.1% of those aged under 35 in Bromley said they identified with an LGB+ sexuality.

Sexual Orientation Percentage

- Heterosexual or straight - 90%
- Gay or lesbian - 1.5%
- Bisexual - 0.9%
- Pansexual - 0.1%
- Asexual - 0.1%
- Queer - 0.0%
- All Other orientations - 0.1%
- Not answered - 7.3%

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

No negative impact on this equality group.

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

N/A- See the mitigation provided in the Age, Disability and Other Categories

Gender re-assignment

Check box if impact identified

Check box if not applicable

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

The EA template gives limited data for this category. The 2021 Census provides a detailed breakdown for the first time-see Bromley data below which sets out the gender preferences of residents with 94% stating they were the same gender as at birth:

Gender Preference percentage rates

- Gender identity same as at birth - 94%
- Gender different from birth - 0.2%
- Identifying as Trans women - 0.1%
- Identifying as Trans man - 0.1%
- Nonbinary - 0.1%
- Other - 0.0%
- Not answered - 5.6%

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

No negative impact on this equality group.

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

N/A - See the mitigation provided in the Age, Disability and Other Categories

Marriage and Civil Partnership

Check box if impact identified

Check box if not applicable

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

The data in the EIA template has been considered along with the latest 2021 Census data which shows that out of Bromley residents aged 16 years and over, 36.5% said they had never been married or in a civil partnership in 2021, up from 33.6% in 2011.

- In 2021, just under one in two people (47.8%) said they were married or in a registered civil partnership, compared with 48.5% in 2011. The percentage that had never married or never registered a civil partnership was 36.5% The percentage of adults in Bromley that had divorced or dissolved a civil partnership decreased from 8.3% to 8.0%, with 2.1% separated but still in legally married or in a civil partnership. 5.7% of the partnership were widowed or a surviving civil partnership.
- The increase in the percentage of people aged 16 years and over who had never been married or in a civil partnership was greater in Bromley (2.9 percentage points) than across London (2.1 percentage points, from 44.1% to 46.2%). Across England, the percentage increased by 3.3 percentage points, from 34.6% to 37.9%.
- These figures include same-sex marriages and opposite-sex civil partnerships in 2021, neither of which were legally recognised in England and Wales in 2011. Same-sex marriages have been legally recognised in England and Wales since 2014 and opposite-sex civil partnerships since 2019.

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

No negative impact on this equality group.

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

N/A - See the mitigation provided in the Age, Disability and Other Categories

Other groups affected

Check box if impact identified

Check box if not applicable

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

The EIA process highlights the need for consideration to be given to other user group who may be affected by this proposal including those who do not readily fall within the protected characteristics, such as children in care, people who are affected by socio-economic disadvantage or who experience significant exclusion or isolation because of poverty or income, education, locality, social class.

As the conversion of time limited parking to cashless pay bays involves paying via a cashless system, this assessment has further considered the needs of those affected by digital exclusion or who could be without a bank account alongside the needs of the listed equalities groups e.g Age and Disability – see relevant sections. Due to free parking at these bays being replaced by standard parking charges the socio-economic impact has also been considered.

Barriers to use -mobile phones and card payment

In 2022 the EIA which assessed the impact of replacing the Pay & Display machines in the Borough with a cashless parking system estimated that 93% of the UK population own a smartphone. Over 55s report the lowest ownership of any age group, but still remains high at 82% ownership following a rapid increase over the last 5 years. Refreshed 2024 data from the same source re-enforces this

Source: <https://www.statista.com/statistics/271851/smartphone-owners-in-the-united-kingdom-uk-by-age/>

The use of technology amongst all age groups grew visibly during the pandemic during periods of lockdown with older people using technology including phones to shop online and facetime/zoom with family and friends which continues. Cashless parking was successfully rolled out within the Borough following an extensive information campaign which highlighted that as an alternative for those who do not have a mobile phone, parking sessions can be booked online before they park, although this cannot guarantee a parking space.

Card payment

As of July 2022, 150 million credit and debit cards were recorded as being in circulation in the UK – over double the population of the UK. The latest UK Finance today Payment Markets Report payments trends across 2022 and forecasts to 2032 show that for the first time, half of all payments (50 per cent) in the UK were made using debit cards. The number of contactless payments increased by 30 per cent to 17

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billion. Nearly a third of adults are registered for at least one mobile payment service, while 86 per cent of adults used a form of remote banking, demonstrating continued growth in the use of Faster Payments by both consumers and businesses.

Source: [Half of all payments now made using debit cards | Insights | UK Finance](#)

Reliable data on the number of residents and visitors to Bromley who do not hold a bank account is not available. Research by Transport for London suggests around 1% of residents in London do not hold a bank account. Access to a transactional bank account is seen by national Government as crucial. Payment Accounts Regulations 2015 legislate that the nine biggest current account providers in the UK must offer basic bank accounts free to anyone, including those who cannot open a standard current account because they are ineligible or people who don't use banks. The impact concerns only those members of the community who drive a vehicle and do not have a bank account, not the population as a whole.

It seems highly unlikely for the reasons below that the number of people locally owning or operating a vehicle without access to a bank account would be significant. In order to operate a vehicle, the driver must seek and retain an MOT, VED certificate and insurance. In many cases, further administrative tasks such as paying for levies including Congestion Zones or Ultra Low Emission Zones. A further consideration for the wider community is the administration of benefits and credits. In almost all cases, a basic bank account is required for payments to be made, in addition to the ease of administration, accounts also act as a proof of identity and a mitigation against fraud. Those eligible for the Mobility car scheme are likely to have a bank account as this is usually the way they receive their allowances.

Socio-economic disadvantage

The English Indices of Deprivation 2019 demonstrates that the London Borough of Bromley on average has low levels of deprivation. Less than half of Bromley's 197 LSOAs (neighbourhoods) are counted within the nation's top half most deprived (i.e. 27% vs 50% nationally). 18% of Bromley's LSOAs fall within the top 10% least deprived nationally. Pockets of deprivation exist within the borough, particularly around Penge, Cray Valley, Mottingham and Chislehurst North. The proposal relates to 262 parking bays at 17 sites across the Borough.

The conversion of time limited parking bays to cashless parking will increase the vehicle running costs for those who have previously used the time limited parking bays. After the initial purchase, the cost of owning and running a car includes car insurance, MOT, car tax, maintenance, parking and road charges. Money Helper, a government-approved online advice service, has a car costs calculator to help you work out exactly how much it would cost to own a certain car. Average annual cost of running a car based on data from Money Helper, confused.com car insurance, and government car tax (vehicle excise duty) rates is £3,186 for outer London and £3,502 for inner London

Recent Census data on car ownership of one car/van in Bromley is the highest with 77.2% of residents having access to one or more car, with there being a 0.1% difference between residents owning no cars/vans and those with two cars/vans. High levels of car ownership indicate that car owners typically have higher incomes than those who cannot afford to run a car.

What is the proposal's impact on the equalities aims?

(Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact)

- There will be a financial impact on those currently receiving free parking at the time-limited parking bays within the Borough as their parking costs will increase.
- Digital exclusion – that people without mobile phones or computers will find it difficult to make payment through the cashless payment system

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

- Cashless parking has been in operation in Bromley since 2022 so residents are experienced in using this system with monitoring of complaints and feedback
- For residents wishing to park for free, street parking can be found at many locations across the Borough. To offset financial impact signpost motorists to the value parking schemes and lower cost parking options as part of the communications campaign to notify of the parking changes
- As an alternative to car travel free and subsidised travel is available for protected characteristics including Age and Disability and children and young people. Subsidised travel options include a 50% reduction for anyone in receipt of Jobseeker's Allowance or Universal Credit unemployed for 13-39 weeks.
- The cost of the proposed paid for parking is linear, at about 35 pence for 10 minutes, 50 pence for 20 minutes and £2 for 2 hours. A single bus journey is £1.75.

4. Conclusion and reporting guidance

Set out your conclusions below using the EA of the protected characteristics and submit to your Director for approval.

If you have identified any negative impacts, please attach your action plan to the EA which addresses any negative impacts identified when submitting for approval. If you have identified any positive impacts for any equality groups, please explain how these are in line with the equality aims. Review your EA and action plan as necessary through the development and at the end of your proposal/project and beyond. Retain your EA as it may be requested by Members or as an FOI request. As a minimum, refer to any completed EA in background papers on reports, but also include any appropriate references to the EA in the body of the report or as an appendix.

Data Analysis

The data provided within this EIA demonstrates the minimal impact on the local population. A range of key data sources and policies have been considered in order to measure the impact of this proposal on the equalities groups in Bromley which includes.

- Census 2021 data
- Office of National Statistics (ONS data)
- Equality Act 2010
- Department of Transport (DoT)
- Joint Strategic Needs Assessment (JSNA)
- Index of Multiple Deprivation (IMD) data

Conclusion

This analysis concludes that the proposal to convert time limited parking bays across various sites to a cashless parking system could have a possible impact on the following equality groups, age, disability and other (socio-economic), however mitigation can be applied for each of these categories which is set out in the relevant categories within the assessment. The actions set out below fully mitigate any negative impact. The consultation findings will also be considered and addressed.

Mitigating actions

In order to mitigate the impact of the conversion of the time-limited bays to cashless pay bays the following mitigating actions which are set out within this EIA are summarized below

EIA: Conversion of time-limited parking bays to cashless pay-bays

- Blue Badge holders are still able to park for free at the time-limited bays which means they won't need to use the RingGo cashless system which they may find difficult. The usual Blue Badge terms and conditions will apply including using the display clock to indicate arrival time
- Misuse of the time-limited bays has rendered these bays sometimes unavailable to motorists including those with a low income. Introducing standard charges will prevent misuse and increase availability.
- Concerns about digital inclusion relating to smartphones and computers to use the cashless system are offset by the successful implementation of the RingGo cashless system which was implemented in 2022 so all the Equalities groups are already using the system
- Bromley has an above average number of residents with one or more cars. High levels of car ownership indicate that car owners typically have higher incomes than those who cannot afford to run a car.
- Motorists to factor in increased parking charges to their vehicle running costs. Residents with financial difficulty to seek support from agencies including CAB. Free street parking options can be found at locations across the Borough.

Recommendations

Should the proposal be implemented a communication plan will be activated to mitigate impact and raise awareness of the service change. This approach worked well in 2022 when the P&D machines were removed and cashless parking introduced. This will include, but not be limited to the following:

- Letters to residents in the areas where the current time-limited parking bays are situated to inform them of the impending changes setting out timescales.
- Engagement with Ward Councillors on the decision, to help support the communications with local residents.
- Publication of the decision on the Council's website.
- Signposting support at libraries for residents who need help making cashless payments and need to use free computers or wi-fi.
- Publication of this EIA on the Council's website.

Outcome of analysis

Outcome 1

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

Outcome 2

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

Outcome 3

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

Outcome 4

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

SIGN OFF BY DIRECTOR:



NAME: Dan Jones

DATE: Monday 3rd March 2025

APPENDIX 1-EQUALITY IMPACT ASSESSMENT ACTION PLAN

Please list actions that you plan to take as a result of this assessment, continuing on a separate sheet if necessary. If appropriate these actions should be added to any business/service plan for the function.

1. **MITIGATE IMPACT:** The decision to implement the changes to time-limited parking bays are subject to an equality assessment which will be published on the Council's website

ACTIONS TO BE UNDERTAKEN AND DESIRED OUTCOME: Undertake and publish full Equality Impact Assessment for the proposal to ensure the change is fully compliant with all key legislation including the Equalities Act 2010

ACTION OWNER AND TARGET DATE: Equalities Champion-Upon Completion

2. **MITIGATE IMPACT:** Follow the statutory regulations for proper notification of change to minimise impact

ACTIONS TO BE UNDERTAKEN AND DESIRED OUTCOME: Advertise the proposals online and in local news articles as required by the statutory regulations to ensure compliance with the regulations and proper processes

ACTION OWNER/TARGET DATE: Report Owner to the scheduled for relevant Committee date

3. **MITIGATE IMPACT:** Address public objections to proposals

ACTIONS TO BE UNDERTAKEN AND DESIRED OUTCOME: Report to relevant Cabinet member or Committee chairperson any objections received. In response to objections received to date Committee report drafted for this proposal

ACTION OWNER/TARGET DATE: Report Owner report complete and scheduled to be presented at the relevant Committee date

4. **MITIGATE IMPACT:** Communications in place

ACTIONS TO BE UNDERTAKEN AND DESIRED IMPACT: Accurate information to be provided through the web pages to ensure that the public are aware of the on-street changes once made. All web pages to be updated

ACTION OWNER/TARGET DATE: Parking Services Communications Officer and Bromley Web Team. Date TBC