

## **LBHF Equality Impact Analysis Tool**

### **Conducting an Equality Impact Analysis**

An EqIA is an improvement process which helps to determine whether our policies, practices, or new proposals will impact on, or affect different groups or communities. It enables officers to assess whether the impacts are positive, negative or unlikely to have a significant impact on each of the protected characteristic groups.

The tool has been updated to reflect the new public sector equality duty (PSED). The Duty highlights three areas in which public bodies must show compliance. It states that a public authority must, in the exercise of its functions, have due regard to the need to:

- 1. Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under this Act;**
- 2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;**
- 3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.**

Whilst working on your Equality Impact Assessment, you must analyse your proposal against the three tenets of the Equality Duty.

## General points

1. In the case of matters such as service closures or reductions, considerable thought will need to be given to any potential equality impacts. Case law has established that due regard cannot be demonstrated after the decision has been taken. Your EIA should be considered at the outset and throughout the development of your proposal, it should demonstrably inform the decision, and be made available when the decision is recommended.
2. Wherever appropriate, the outcome of the EIA should be summarised in the Cabinet/Cabinet Member report and equalities issues dealt with and cross referenced as appropriate within the report.
3. Equalities duties are fertile ground for litigation and a failure to deal with them properly can result in considerable delay, expense and reputational damage.
4. Where dealing with obvious equalities issues e.g. changing services to disabled people/children, take care not to lose sight of other less obvious issues for other protected groups.
5. If you already know that your decision is likely to be of high relevance to equality and/or be of high public interest, you should contact the Equality Officer for support.
6. Further advice and guidance can be accessed from the separate guidance document (link), as well as from the Opportunities Manager: [PEIA@lbhf.gov.uk](mailto:PEIA@lbhf.gov.uk) or ext 3430

## LBHF Equality Impact Analysis Tool - Proposed Council Housing Tenancy Agreement

Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	2012/13 Quarter 4
Name and details of policy, strategy, function, project, activity, or programme	<p><b>Title of EIA: Proposed Changes Following Review of Car Parking on Council Housing Land</b></p> <p><b>Short summary:</b></p> <p>In July 2012 a review of surface parking and garages on Council estates commenced. The purpose of the review was to:</p> <ul style="list-style-type: none"> <li>• Review current arrangements and charges in the borough for surface parking and garages</li> <li>• Consider market rate charging models</li> <li>• Consider the performance of White City Controlled Parking Zone and if it should be adopted borough wide with all roads moving from HRA control to adoption by Highways.</li> <li>• Investigate best practice with other London boroughs</li> <li>• Undertake statutory resident consultation</li> </ul> <p>Tenants had the opportunity to submit their personal views in writing either by way of the freepost return form, by contacting the Get Involved consultation email address, or by telephone to a team of four officers who recorded all questions and feedback. The matter was discussed at Area Forums on 3rd December 2012, 4th December 2012, 11th December 2012, and 19th December 2012 and Borough Forum on 29<sup>th</sup> January 2013.</p> <p>This equalities impact assessment has been completed to consider the proposed charging policy for garages on Council Housing Estates which will be considered by Cabinet in June 2013. It has been carried out in order to analyse the impacts of the proposals on those with protected characteristics under the Equality Act 2010. Where proposals have been identified as having a negative impact, consideration has been given as to whether it is possible to mitigate for that impact.</p> <p>The EIA will be reviewed as part of the decision making process for parking arrangements on HRA land.</p>

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<b>Date of completion of final EIA</b>	4th March 2013

Section 02	Scoping of Full EIA		
<b>Plan for completion</b>	<p><b>Timing:</b> The EIA was carried out and informed by the resident consultation process that has helped shape the recommendations in the Cabinet report on the HRA garage proposals and will shape the continuing review of the car parking strategy. A report on garage management and the review of parking options will be considered by Cabinet in June 2013.</p> <p><b>Resources:</b> Borough-wide statistics were drawn from corporate sources, from the Parking Permit Team in H&amp;F Direct, as well as relevant census data (ONS). The EIA was also informed by information held on lworld, which is the Housing Management database.</p> <p>The Council does not keep a record of car ownership on housing estates or equality information on car ownership. Therefore the impact on protected groups is informed by the outcome of resident consultation on garage and parking proposals.</p>		
<b>Analyse the impact of the policy, strategy, function, project, activity, or programme</b>	<p><b>Analyse the impact of the policy on the protected characteristics (including where people / groups may appear in more than one protected characteristic). You should use this to determine whether the policy will have a positive, neutral or negative impact on equality, giving due regard to relevance and proportionality.</b></p> <p>The approach taken during the four week consultation process has been inclusive of all tenant and leasehold groups. The use of a number of consultation methods (hard copy response form, email address, telephone and webpage has provided tenants with a number of options to obtain information and express their views.</p>		
	<b>Protected characteristic</b>	<b>Analysis</b>	<b>Impact:</b> Positive, Negative, Neutral

	<b>Age</b>	<p>parking proposals</p> <p>The proposals for parking and garages emerged as being of low relevance to most age groups.</p> <p>Some residents who responded to the consultation and identified themselves as elderly indicated that they did not own a car. Of those, 6 required access to parking for visitors. This group is more likely to be living alone according to H&amp;F's Carer Strategy 2005-10 and Experian Mosaic Data for the borough, therefore any future proposal regarding visitor parking will be of high relevance to those of retirement age.</p> <p>Analysis of the consultation feedback has shown that those residents who identified themselves as over retirement age, 2 wanted to maintain the provision of an allocated bay.</p> <p>The continuing review will consider options regarding specific bays.</p> <p>The implementation of the parking and garage proposals has the potential to positively impact on elderly residents, as the proposals consulted on provide greater equality of access to parking on housing land.</p> <p><b>Garage Proposals</b></p> <p>There were no specific age related issues raised in relation to the proposals concerning the garage charging arrangements or garage management policy</p> <p><b>Relevance: HIGH</b></p>	<p>Positive</p> <p>Positive</p> <p>Neutral</p>
	<b>Disability</b>	<p>The Disability characteristic is a principal area of review for the parking and garage proposals EIA. The 2011 Census data indicates that around 13% of residents in Hammersmith and Fulham have a limiting or long term illness. Where physical disability requires a resident to park close to their home, the continuing review will consider current arrangements with the aim of ensuring needs are met and to considering bring parity with general highway arrangements.</p>	<p>Positive</p>

		<p>The five wards with the highest disability rates are all in the north of the borough; College Park and Old Oak, Wormholt and White City, Shepherd's Bush Green, Hammersmith Broadway and Askew. These proposals have little impact on these Wards because Old Oak and Wormholt estates have no HRA parking; White City estate is not included in the proposals; the largest estate in Hammersmith Broadway Ward is Ashcroft Court, which has no estate parking; and in Askew Ward there are 24 BBH living on our estates..</p> <p>The proposals to introduce parking enforcement have the potential to have a positive impact upon all users of the parking facility and particularly disabled Blue Badge holders, ensuring disabled parking bays for Blue Badge holders are only used by those with a valid badge.</p> <p><b>Garage Proposals</b></p> <p>There were no specific disability related issues raised in relation to the proposals concerning the garage charging arrangements or garage management policy</p> <p><b>Relevance: HIGH</b></p>	Neutral
	<b>Gender reassignment</b>	<p>The protected characteristic of gender reassignment did not emerge as relevant to this review during consultation.</p> <p><b>Relevance: LOW</b></p>	Neutral
	<b>Marriage and Civil Partnership</b>	<p>This is not relevant to this review, as the service is not being offered in a different way to married couples or civil partners.</p> <p><b>Relevance: N/A</b></p>	N/A
	<b>Pregnancy and maternity</b>	<p>One woman stated they were pregnant or had small children and raised a concern about no-longer being able to guarantee a parking space close to her home.</p> <p>The future review of parking arrangements will take this concern into</p>	Neutral

		consideration.	
		<p><b>Garage Proposals</b></p> <p>There were no specific pregnancy or maternity related issues raised in relation to the proposals concerning the garage charging arrangements or garage management policy.</p> <p><b>Relevance: LOW</b></p>	
	<b>Race</b>	<p>Race did not emerge as relevant to the changes, during the review.</p> <p>A higher proportion of BME residents live in H&amp;F Council estates compared with other racial groups in the boroughs' population. As such, any changes proposed resulting from the future parking review may have a disproportionate effect on BME residents compared with other racial groups.</p> <p>The implementation of the parking and garage proposals has the potential to positively impact on residents of any race, because the proposals consulted on provide greater equality of access to parking on housing land.</p> <p><b>Garage Proposals</b></p> <p>There were no specific race related issues raised in relation to the proposals concerning the garage charging arrangements or garage management policy</p> <p><b>Relevance: medium</b></p>	Positive
<b>Religion/ belief (including non-belief)</b>	<p>The protected characteristic of Religion did not emerge as relevant to this review during consultation.</p> <p><b>Relevance: LOW</b></p>	Neutral	

	<p><b>Sex</b></p> <p>Two women of the 646 that rent an individual parking space objected to the proposal to remove the allocation of individual parking bays. Individual bays are currently let to 646 residents (3.8% of all residents) and as the census data indicates 331 of these are likely to be women as they constitute 51.3% of householders in the borough.</p> <p>The future review of parking will take this concern into consideration.</p> <p>The implementation of the parking proposals has the potential to positively impact on all residents because the proposals consulted on provide greater equality of access to parking on housing land, restricting those who are not eligible to parking from parking on HRA land.</p> <p><b>Garage Proposals</b></p> <p>There were no specific disability related issues raised in relation to the proposals concerning the garage charging arrangements or garage management policy</p> <p><b>Relevance: Low</b></p>	Positive
	<p><b>Sexual Orientation</b></p> <p>This protected characteristic of Sexual Orientation did not emerge as relevant to this review during consultation as no-one indicated it was an issue because of their sexual orientation.</p> <p><b>Relevance: LOW</b></p>	Neutral
<p><b>Human Rights or Children's Rights</b></p> <p>If your decision has the potential to affect Human Rights or Children's Rights, please contact your Borough Lead for advice</p> <p><b>Will it affect Human Rights, as defined by the Human Rights Act 1998?</b></p> <p><b>No</b></p> <p><b>Will it affect Children's Rights, as defined by the UNCRC (1992)?</b></p>		



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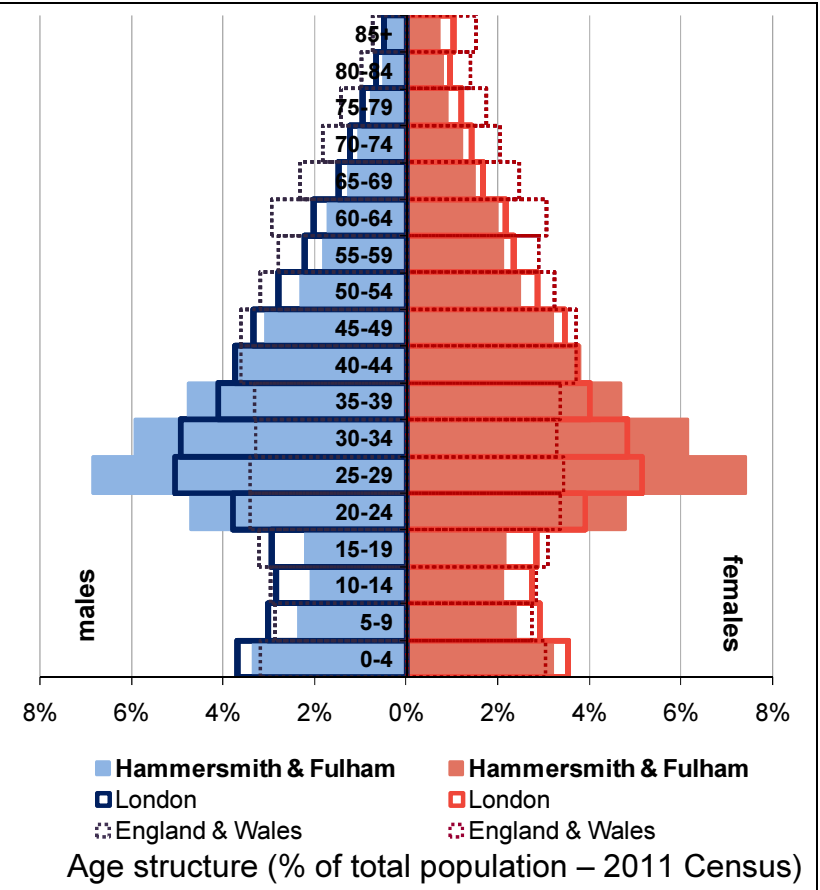
<b>Section 03</b>	<b>Analysis of relevant data</b> Examples of data can range from census data to customer satisfaction surveys. Data should involve specialist data and information and where possible, be disaggregated by different equality strands.
<b>Documents and data reviewed</b>	<p><b><u>LOCAL DEMOGRAPHICS OF EQUALITY TARGET GROUPS</u></b></p> <p>The following summary of the demographic situation in relation to each of the equality groups is based on the most recent (2011 census) datasets.</p> <p><b>Population</b></p> <p>The borough population was measured at 182,493 at the time of the 2011 Census making Hammersmith &amp; Fulham the sixth most densely populated local authority in England and Wales.</p> <p>The population of the borough is relatively young and ethnically diverse. It is also a highly mobile population with about quarter of all residents having moved from outside the UK in the previous ten years.</p> <p>It is projected by the GLA (2012), taking account a quantity of the borough's future housing supply, that the population will increase by 15% to 208,976 in 2031.</p> <p><b>Households</b></p> <p>The borough has a high proportion of single people under pensionable age, the sixth highest proportion (29%) of any local authority in England &amp; Wales and 37.4% of all households consist of one person households in 2011.</p> <p>It is projected by GLA (2012) that households will increase from 80,590 in 2011 to 92,085 in 2031 (14% increase). It is also projected that the main growth in number of households will be in 'one person' households (18% up to 2031), while the number of 'couple' households will increase by just 3% between 2011 and 2031.</p> <p><b>Age</b></p>

The age profile of Hammersmith & Fulham is typical of an affluent urban population. There are fewer people near the retirement age and a corresponding lower level of younger children than in London and England & Wales.

Three in four residents are of working age (16-64); the third highest level in England & Wales.

In 2011, the borough had a higher proportion of young adults aged 20-39 (45%) than London (36%) and England and Wales (27%). Conversely, fewer than one in five of the borough's population are children and non-dependent young people (0-19) compared to 25% in London and 24% in England and Wales. Finally, 9% of the population is aged 65 or over, which is relatively lower than the London (11%) and country (16%) averages.

According to the H&F Carer's Strategy 2005-2010 and Experian Mosaic Data for the borough, older residents in the borough are more likely to live alone.



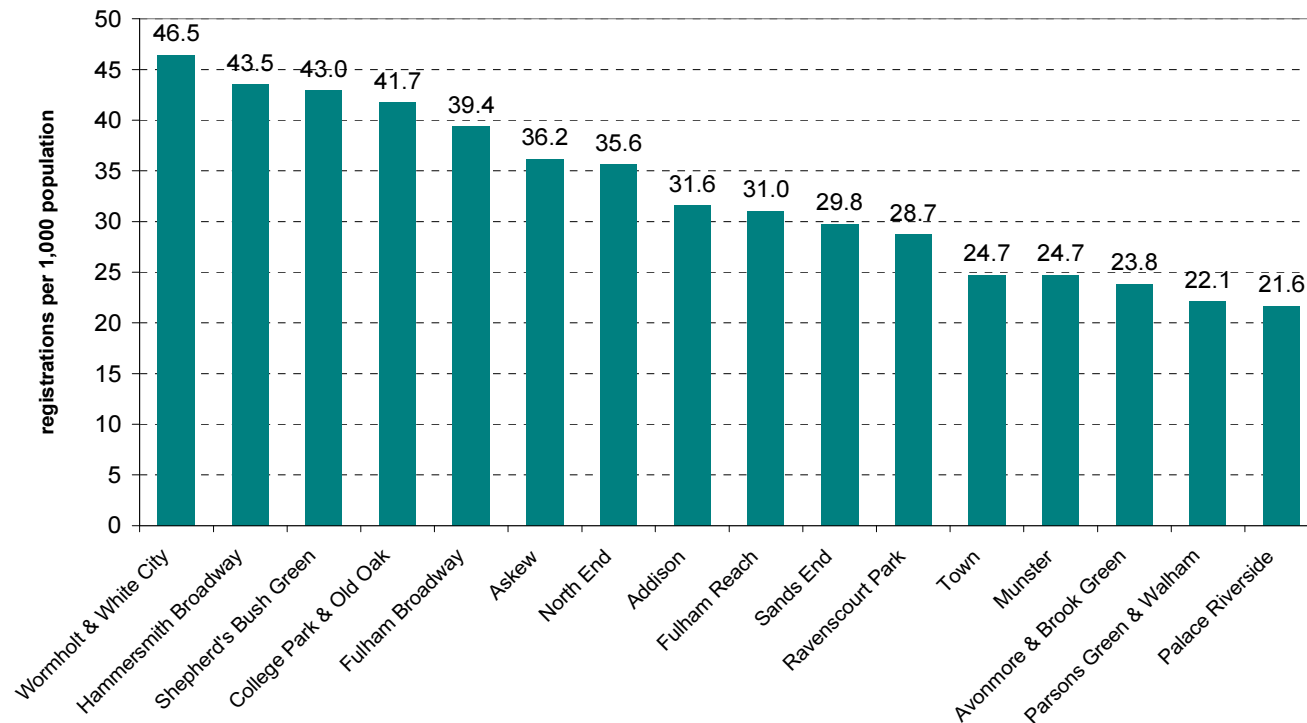
**Disability**

The level of physical disability registrations for Hammersmith and Fulham as a whole is 39.4 registrations per 1,000 population. The 2011 Census data indicates that around 13% of residents in Hammersmith and Fulham have a limiting or long term illness. Wormholt and White City has the highest rate of physical disability registrations in the borough (46.5), followed closely by Hammersmith Broadway (43.5), Shepherd’s Bush Green (43.0) and College Park and Old Oak. Palace Riverside has the lowest level of registrations in the borough. Physical disability registration is voluntary so the figures do not give a complete picture of disability within Hammersmith & Fulham. Ravenscourt Park Ward has the highest number of recorded visually impaired people in the borough due to a home for the visually impaired being located there.

We recognise that people with disabilities and those that support them may be represented in one or more of the

other equality groups. The other related group that is usually referenced is age; in particular, we recognise that people with disabilities who can experience difficulty accessing services are often children and young people, older people, and those who may provide care for older and younger disabled people. As disability covers a broad spectrum, we also recognise that adaptations for people with mobility impairments may not make services accessible for people with sensory impairments, and that people with mental health or long-term limiting illnesses may have different requirements.

The five wards with the highest disability rates are all in the north of the borough; College Park and Old Oak, Wormholt and White City, Shepherd's Bush Green, Hammersmith Broadway and Askew. These proposals have little impact on these Wards because Old Oak and Wormholt estates have no HRA parking; White City estate is not included in the proposals; the largest estate in Hammersmith Broadway Ward is Ashcroft Court, which has no estate parking; and in Askew Ward there are 24 BBH living on our estates and arrangements will be made to provide adequate free parking for these residents close to their homes .



	<p style="text-align: right;">Number of people registered with a disability (Community Services registrations)</p> <p>Sex From the 2001 Census (H&amp;F) the breakdown of households by sex shows there were: Male - 78,993 (47.8%) Female - 86,249 (52.2%)</p> <p>The 2011 Census for H&amp;F indicates an increase in the number of households overall, with an increase of 0.8% in the proportion of male households than there was in 2001. This is still less than the overall proportion of female households: Male - 88,914 (48.7%) Female - 93,579 (51.3%)</p>
<b>New research</b>	<p>If new research is required, please complete this section <b>N/A</b></p>

<b>Section 04</b>	<b>Consultation</b>
<b>Consultation</b>	<p><b>Details of consultation findings (if consultation is required. If not, please move to section 06)</b></p> <p>The consultation process was in compliance with the statutory requirements placed upon the Council under s105 of the Housing Act 1985 for tenant consultation, but also include leaseholders and freeholders.</p> <ul style="list-style-type: none"> <li>15,050 consultation packs were sent to tenants, leaseholders, and freeholders across the borough, White City households (approximately 2000) were not included in this consultation because the estate is already in a Controlled Parking Zone (CPZ). Consultation was about charging policy for parking and garages, enforcement and improvement of garages.. The consultation attracted feedback from 635 respondents in total. This is broken down as: 35 email responses, 61 telephone responses, and 539 written responses; which represents an overall response rate of 4.2%. Of these 239 were women, 207 men, 24 responded as couples and the rest</li> </ul>

	<p>failed to identify their gender.</p> <ul style="list-style-type: none"> <li>• Of the 635 respondents 54 identified that they had a disability of which 48 responded in writing, 1 by email and 5 telephoned. In total 25 respondents said they were over retirement age, 21 responded in writing, 1 by email and 3 by telephone.</li> <li>• The proposed changes set out to introduce a consistent and realistic charging policy for parking and garages, and for the monitoring and enforcement of parking arrangements on the Council's housing land. The Housing Revenue Account is ring-fenced and along with the housing subsidy system introduced in part IV of the Local Government Act and Housing Act 1989, which specified that expenditure and income related to property listed in section 74 of the Act must not subsidise services which are for the benefit of the wider community. In addition parking and garages fall within the remit of the Medium Term Financial Strategy and so services provided must be paid for by services users.</li> <li>• Fulham and Lancaster Court Estates were consulted on proposals to include the estates in a local CPZ in addition to the changes to the charging policy and enforcement</li> <li>• Consultation documents relating to the proposed changes were issued on Monday 10<sup>th</sup> December 2012 with a four week deadline for responses. Consultation ended on 9th January 2013. The full set of documents comprised: <ul style="list-style-type: none"> <li>• Response Pro forma</li> <li>• Prepaid Envelope</li> </ul> </li> </ul> <p>Tenants were invited to respond in a variety of ways, either by:</p> <ul style="list-style-type: none"> <li>• Detailing their comments on the response proforma and returning it in the prepaid envelope provided.</li> <li>• Telephoning four dedicated consultation officers via either a free phone telephone number or direct dial extensions, or leaving a message to express their views.</li> <li>• Emailing their comments to a dedicated consultation email inbox from where their comments were retrieved and recorded.</li> </ul>
<p><b>Analysis of consultation outcomes</b></p>	<p><b>Summary of Consultation Responses</b></p> <p><b>Specific Parking &amp; Garages Concerns</b></p> <p>A number of tenants raised queries or made comments about parking and garages charges and enforcement arrangements. Some of the principal comments that were considered when evaluating this EIA are listed below:</p>

### Age

- 1) One elderly resident commented that he may find it difficult to access a parking space if he had to walk further from his front door to a parking bay.

Council Response - The age profile of Hammersmith & Fulham is typical of an affluent urban population and as such the proportion of elderly people in the borough is low. The 2011 Census shows that 9% of the population in the borough is aged 65 or over and some of these residents are also Blue Badge Holders. The continuing review of parking will take this concern into consideration.

- 2) A number of residents who identified themselves as elderly raised the issue of parking for carers and some sheltered residents wanted to retain their parking for visitors and doctors.

Council Response - The continuing review of parking will take this concern into consideration and will reflect as closely as possible the arrangements on highways.

### Disability

- 1) Many residents approved of the provision of disability parking bays for BBH.

Council Response - The continuing review of parking will take this approval into consideration.

- 2) Six residents who identified themselves as elderly said they wanted parking for their visitors and one raised a concern that because of infirmity he wanted to guarantee a parking space close to his home.

Council Response - The continuing review of parking will take this concern into consideration.

### Sex

One woman raised a concern about her personal safety if the provision of individual allocated parking bays is taken away.

–The continuing review of parking will take this concern into consideration.

### Personal Security & Reduced Mobility

Personal security and the security of cars were concerns raised by a few respondents if they did not have their own individual parking bay.

Council Response - The continuing review of parking will take this concern into consideration.

### Financial

- 1) A number of residents asked if there will be an option to pay the parking charges in instalments.

Council Response - The continuing review of parking will take this concern into consideration and it will be reflected in future proposals for parking charges on estates.

- 2) Around 190 residents commented on the proposal to increase garage rent levels closer to that of the market value. The majority were in favour of a realistic charge, but did not agree that the charge to rent a garage should be set at the market value, as they considered property values in the borough high which would make the garage rents unaffordable.

Council Response - The recommended charge represents an increase of 68% on the current charge of £13.69 per week or £59.32 a month; which is closer to the rent charged by other boroughs but still significantly below the private market rent.

### Allocations of Parking Spaces

A large number wanted a restriction of one permit per household to stop abuse of the system. A number of respondents raised questions asking what would happen on small estates or blocks with few spaces, but large number of dwellings.

Council Response - The continuing review of parking will take this concern into consideration and it will be reflected in future proposals for parking on estates.

### Allocation of Spaces to Carers and Visitors

A number of elderly residents raised the issue of parking for carers and some sheltered residents wanted to retain their parking for visitors and doctors.



	<p>Council Response - The continuing review of parking will take this concern into consideration and it will be reflected in future proposals for parking on estates.</p> <p><u>Contractor &amp; Staff Parking</u></p> <p>Contractor and staff parking was a key issue with many complaints that the current arrangements were being abused with cars or vans left all day and in some cases overnight in resident bays.</p> <p>Council Response - Staff car parking is under review by the Chief Executive's Office and their findings will be implemented once agreed. The continuing review of parking will take this concern into consideration and it will be reflected in future proposals for parking on estates.</p> <p><u>Proposed Separate Arrangements for Fulham Court &amp; Lancaster Court</u></p> <p>Very few residents from either Fulham Court or Lancaster Court responded but there were a number of objections raised mainly from residents that rented individual allocated bays and wanted to keep them. There were some concerns about increased traffic and the safety of children on the estate. Residents considered that the controlled zone hours were not long enough and football fans would regularly take up spaces on the estate.</p> <p>Council Response - The continuing review of parking will take this concern into consideration and it will be reflected in future proposals for parking on estates.</p>
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<b>Section 05</b>	<b>Analysis of impact and outcomes</b>
<b>Analysis</b>	<p><b>What has your consultation (if undertaken) and analysis of data shown? You will need to make an informed assessment about the actual or likely impact that the policy, proposal or service will have on each of the protected characteristic groups by using the information you have gathered. The weight given to each protected characteristic should be proportionate to the relevant policy (see guidance).</b></p> <p>This has been covered in both the analysis of consultation results and in the nine protected characteristics.</p>

Section 06	Reducing any adverse impacts and recommendations
Outcome of Analysis	<p><b>Include any specific actions you have identified that will remove or mitigate the risk of adverse impacts and / or unlawful discrimination. This should provide the outcome for LBHF, and the overall outcome.</b></p> <p>The continuing review of parking will take into consideration the concerns identified below.</p> <p>Following detailed analysis of the consultation responses the principal issues that have been highlighted relate to:</p> <p><u>Age</u>  One residents who responded to the consultation said they were elderly and infirm, they were concerned that because of the loss of their individual parking bays they would have to park a greater distance from their home.</p> <p><u>Disability</u>  Where physical disability requires a resident to park close to their home, the continuing review will :</p> <ul style="list-style-type: none"> <li>• Identify Blue Badge holders on council estates and consider the best way of providing parking as close to their homes as possible and that reflects arrangements of Highways as far as possible.</li> <li>• Promote the Blue Badge scheme and;</li> <li>• Consider similar arrangements for parking for carers as there is on the Highway scheme.</li> </ul> <p>The five wards with the highest disability rates are all in the north of the borough; College Park and Old Oak, Wormholt and White City, Shepherd’s Bush Green, Hammersmith Broadway and Askew.</p> <p><u>Sex</u>  The number of women who responded negatively to the loss of their individual parking space was 10. One felt she would feel less secure, eight said that parking was at a premium and they would not be able to guarantee a space and one wanted to park close to her front door. Three men said it would have a negative impact, two because their insurance would be higher and one because parking was at a premium and they wanted a guaranteed space. Individual bays are currently let to 3.8% of residents and as the census data indicates 51.3% of these are likely to be women, as that is their representation in the local community.</p>

Section 07	Action Plan					
<b>Action Plan</b>	Note: You will only need to use this section if you have identified actions as a result of your analysis					
	Issue identified	Action (s) to be taken	When	Lead officer	Expected outcome	Date added to business/service plan
	The needs of Blue Badge Holders to have parking close to their home on Council estates.	Promotion of the BBH scheme and identification of BBH on Council estates.	June/July 2013	Wendy Reade	Parking arrangements for residents registered with a Blue Badge that meets the requirements of the council as landlord.	June 2013
Arrangements for visitor parking and carer parking that best reflects arrangements on Highways	Further consideration of how this could be implemented and managed in an efficient and effective way	July 2013	Wendy Reade	Provision for visitors and carers that reflects resident views and best reflects arrangements on Highways	June 2013	

Section 08	Agreement, publication and monitoring	
<b>Chief Officers' sign-off</b>	Name: Jo Rowlands Position: Director Housing Services Email: <a href="mailto:jo.rowlands@lbhf.gov.uk">jo.rowlands@lbhf.gov.uk</a> Telephone No: 020 8753 1313	
<b>Key Decision Report (if relevant)</b>	Date of report to Cabinet/Cabinet Member: 24.06.2013 Key equalities issues have been identified: The ongoing review of parking will reflect the views given in the feedback	

	<p>which will be taken into consideration in any future proposals. Yes and there will be a negative impact for a minority of residents who currently have the opportunity to rent an individual parking bay The proposals for increasing charges for garages and improving the asset had positive feedback, the proposals only affect the minority of residents that rent a garage.</p>
<p><b>Opportunities Manager (where involved)</b></p>	<p>Name: Carly Fry  Position: Opportunities Manager  Date advice / guidance given: 14/02/2013  Email: <a href="mailto:PEIA@lbhf.gov.uk">PEIA@lbhf.gov.uk</a>  Telephone No: 020 8753 3430</p>