

# Cabinet



Wednesday, 29 November 2023 at 5.30 p.m.

Council Chamber - Town Hall, Whitechapel

## Supplementary Agenda – URGENT report on Permit Transfer Scheme


### Contact for further enquiries:

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<p style="text-align: center;"><b>Cabinet</b></p> <p style="text-align: center;"><b>29 November 2023</b></p>	 <p style="text-align: center;"><b>TOWER HAMLETS</b></p>
<p><b>Report of:</b> Corporate Director of Communities</p>	<p><b>Classification:</b> Unrestricted</p>
<p><b>Change and amendments to the Permit Transfer Scheme (PTS) criteria</b></p>	

<b>Lead Member</b>	<b>Councillor Kabir Hussain, Cabinet Member, Cabinet Member for Environment and the Climate Emergency</b>
<b>Originating Officer(s)</b>	Norman Rabess – Parking Team Leader Simon Baxter – Interim Divisional Director Public Realm Michael Darby – Head of Parking, Mobility and Market Services Vicky Allen – Strategy and Policy
<b>Wards affected</b>	All
<b>Key Decision?</b>	Yes
<b>Reason for Key Decision</b>	Significant impact on wards
<b>Forward Plan Notice Published</b>	23/12/2022
<b>Exempt information</b>	N/A
<b>Strategic Plan Priority / Outcome</b>	<ol style="list-style-type: none"> <li>1. Homes for the future.</li> <li>2. Invest in public services.</li> <li>3. A clean and green future.</li> <li>4. A council that works for you and listens to you.</li> </ol>

## Reasons for urgency

The Parking Service needed time to verify the data which took longer than anticipated which is why the report was delayed being shared online. The reason for the urgency is this report addresses some very urgent issues in the borough relating to housing and parking.

## Executive Summary

This report addresses the mayor's strategic priorities and is related to 'Homes for the future' and his pledge to review the car parking permit transfer scheme (PTS).

The review has given us the opportunity to address the gaps identified in the scheme, and day-to-day operational issues which have led to misinterpretation, misunderstanding, and complaints.

The proposal is to reword the scheme to remove ambiguity and widen the criteria of those who can apply to the scheme. In summary, the proposed changes will allow residents who may need a short break from vehicle ownership to retain their right to a permit under the PTS indefinitely.

The proposal will allow the permit holder to apply for a new permit if their old one has expired. In addition, it will allow another family member to apply for a new permit if the previous permit holder no longer needs one.

The proposal amends the PTS to allow a family in an overcrowded property who move to a larger car free property with two or more bedrooms to retain their right to one on-street resident permit.

The proposal removes the PTS criteria 3, which states 'The applicant must have held an on-street parking permit for at least twelve months prior to moving into the new property.

The proposal to extend the PTS to allow an individual or family in an under-occupied property who downsize to a smaller car free property to retain their right to one on-street resident permit. The changes are listed in section 5 below. The changes are designed to alleviate overcrowding issues.

As well as reviewing the Permit Transfer Scheme, the mayor also made a pledge to review car-free zones to ensure those who require vehicles for work are not priced out of the local area. A separate report has been prepared, and we have proposed that a resident who is completely reliant on a vehicle for their livelihood, for example, a licenced taxi driver (including uber drivers), should be allowed to apply for an on-street resident parking permit at a car free property.

## **RE PUBLICATION**

### **Recommendations:**

The Mayor in Cabinet is recommended to:

1. Agree the proposed changes to the Permit Transfer Scheme (PTS) criteria to fulfil the manifesto pledge.
2. To note the Equalities Impact Assessment / specific equalities considerations as set out in Paragraph four.

## **1 REASONS FOR THE DECISIONS**

- 1.1 To deliver the mayor's manifesto pledge to review the Permit Transfer Scheme.
- 1.2 To reduce the number of families living in overcrowded properties who are reluctant to incur the loss of a vehicle if they accept an offer of more suitably sized accommodation in car-free developments, by allowing them to apply for one permit.

- 1.3 To resolve the most common day-to-day queries and complaint issues about the current PTS.
- 1.4 To ensure the scheme is clear, transparent, and fair for our residents.

## **2 ALTERNATIVE OPTIONS**

- 2.1 To keep the current PTS. However, this would not deliver the mayor's manifesto pledge, or resolve the most common day-to-day issues.
- 2.2 To withdraw the PTS. However, this was introduced as a mechanism to address overcrowding in the borough and removing it may lead to fewer households moving.

## **3 DETAILS OF THE REPORT**

- 3.1 The PTS was introduced and adopted by Cabinet in September 2011 as a tool to help reduce the levels of overcrowding in the borough. The aim was to help overcrowded households, accepted onto the housing waiting list, move to larger accommodation in car-free developments, by allowing them to retain one on-street resident parking permit.
- 3.2 In 2011, an independent review of the proposed PTS was undertaken by a transport planning consultancy into the need for a targeted PTS. The study found that approximately one fifth of the reasons given for rejecting social rented property in a car-free development were due to its car-free (permit free) status. This refusal level was even higher amongst those households looking to move as a result of overcrowding (approximately one quarter) due to the social rented home offer being part of a car free housing development.
- 3.3 In December 2021, an Overview and Scrutiny Challenge Report looked into the extent to which the council's parking permit policy influences people's behaviour. The report recommended a number of changes to the Permit Transfer Scheme which have been addressed in this review and reflected in our proposals.

#### **4     Analysis of the current PTS**

- 4.1     Analysis found that the top three reasons why residents were unsuccessful when applying for a permit under the PTS were as follows:
- Not satisfying the twelve-month qualifying period. As an example, 21 (28%) out of 74 applicants did not hold an on-street resident permit for 12 months prior to moving.
  - Failing to renew their permits and as a consequence losing their right to a new permit which have led to complaints and Members Enquiries.
  - Not allowing another occupant to apply for a new permit if the permit holder no longer needs a permit due to a change in circumstance.
- 4.2     The proposed changes will allow a resident to apply for a new permit if their old one has expired, or they cancel it.
- 4.3     The proposed changes will allow another occupant to apply for a new permit under the PTS if the previous permit holder no longer needs a permit due to a change in circumstance.
- 4.4     The proposed changes will allow an individual or families in social housing properties (including mutual exchange) with two or more bedrooms to downsize to smaller car free properties and to retain one on-street resident parking permit.

#### **5     The PTS proposals are as follows:**

- 5.1     To amend the PTS to allow a family in an overcrowded property who move to a larger car free property with two or more bedrooms to retain their right to one on-street resident permit.
- 5.2     To remove the PTS criteria 3, which states ‘The applicant must have held an on-street parking permit for at least twelve months prior to moving into the new property
- 5.3     Amend the criteria to include families living in private rented properties.’
- 5.4     Amend the criteria so that another occupant will be allowed to apply for a new permit providing that one member of the household had previously held a permit under the PTS.

- 5.5 Amend the criteria so that the permit holder is allowed to apply for a new permit if their old one expires, or they cancel it.
- 5.6 To extend the PTS to allow an individual or family in an under-occupied property who downsize to a smaller car free property to retain their right to one on-street resident permit.
- 5.7 Full details of the proposed changes to the PTS are outlined in appendix 1.

## 6 Impact

- 6.1 Census 2021 data shows that has been a decrease in the proportion of Tower Hamlets households that have at least one car or van, from 37% in 2011 to 33.6% in 2021. 66.4% of households in Tower Hamlets have no cars or vans in the households compared to the London average of 42.1%. Tower Hamlets has the third lowest proportion of households that own a vehicle, just above City of London and Islington.
- 6.2 It is difficult to predict the number of additional car parking permits that could be issued due to the proposed changes to the PTS.
- 6.3 The table below shows the total number of active on- street resident permits on 6 November 2023 was 24,373. Of which 809 (3.32 per cent) were issued under the PTS.

Permit Type	Count of Permit Type	% of Permit Type
Resident Permit	20,637	84.67%
Resident Permit (Blue Badge Holders)	2,802	11.50%
Resident Permit Transfer Scheme	809	3.32%
Resident Permit for Decantees	125	0.51%
<b>Grand Total</b>	<b>24,373</b>	<b>100.00%</b>

- 6.4 As of 1 November 2023, there are 24,366 household applications on the Housing Register. 10,866 are overcrowded, and of those, 8,030 require two or more bedrooms.
- 6.5 There are 1,166 under-occupying social tenants on the Housing Register. Of those 600 require two or more bedrooms.
- 6.6 There are 711 homeless households on the Housing Register who have been placed in temporary accommodation outside of the borough and require properties with two or more bedrooms.
- 6.7 Changes to the Permit Transfer Scheme could increase the number of vehicles on the roads in Tower Hamlets. Households assessed as being overcrowded and are offered homes of their choice by our Housing Options Service or partner registered providers and move into two bedroom or larger properties on car-free developments will have the right to retain one parking permit. This right

will apply to under occupying households who move into a car free development in order to free up much needed larger accommodation for overcrowded households.

- 6.8 Every household in the borough that is not in a property on a car-free development is eligible to apply for up to three permits. The proposal enables a household to retain one permit when they are offered a permanent home by Housing Options or its partner registered providers of a larger property on a car-free development. The household that moves into the vacated property then is able to apply for up to three permits.
- 6.9 The planning service are in the process of reviewing the data they hold about development schemes in the borough. This exercise will enable the council to get a better understanding of the status of the major schemes that are not being managed by our own building control surveyors. This will include a more accurate prediction about when they will complete, the number of units including number of family sized homes. Since the majority of new developments are on car-free developments, Parking should be able to use this information to better understand the potential number of residents who may be eligible to apply for on-street parking permits under the PTS.

## **7 EQUALITIES IMPLICATIONS**

- 7.1 A full equality analysis regarding the review of the PTS, which includes the proposal's likely impact on the nine protected characteristics, has been carried out and attached as Appendix 2.
- 7.2 We do not know what the impact of this proposal will have on the number of vehicles in the borough. The council is committed however to encourage residents to switch to sustainable modes of transport
- 7.3 We have planted in excess of a thousand trees to offset carbon footprint. In addition, the council announced that it expects to be net zero in 2025 and net zero borough wide by 2045.
- 7.4 The council has invested £6m into fleet vehicles. So far 350 electric vehicle charging points have been delivered, and we are preparing to install a further 2,000 slow chargers, 200 fast chargers, and 35 rapid chargers over the next three years.
- 7.5 The changes are designed to support our strategic aim of reducing overcrowding in the borough but without adversely disadvantaging households who need to use a car. The majority of overcrowded households are Asian at 73% of the total overcrowding waiting list. We expect the policy to benefit households with dependent children which are most likely to be overcrowded; and older resident households who are most likely to be under occupying. The changes are expected to free up smaller properties for residents on our housing waiting list, and likely benefit younger resident households.



- 7.6 The council has a legal duty to review the quality of air in the area. In 2000 an air quality management area was declared in Tower Hamlets due to high concentrations of NO<sub>2</sub> and Particulate Matter (PM<sub>10</sub>). Poor air quality is associated with several adverse health impacts such as heart and lung disease.
- 7.7 The Council's Transport Strategy outlines that physical activity decreases risks of disease and ill health, including, high blood pressure, type 2 diabetes, coronary heart disease, anxiety, and depression. Promoting car driving may contribute to drivers' and passengers' physical inactivity including children's obesity too. Research from 2019 estimates the mean fraction of mortality attributable to air pollution was higher in Tower Hamlets, than the London average, and was the 6th highest in London. As well as heart disease and cancer poor air quality is also linked to: Asthma, Dementia, Allergies, and reduced life expectancy.
- 7.8 The evidence pack, of the Council's Transport Strategy states:
- Traffic flows are a significant determinant of air pollution in the borough.
  - In the borough, a disproportionately higher rate of South Asian population who are over 70 years old have been diagnosed with asthma.
- 7.9 Key groups vulnerable to poor air quality include:
- Infants and young children,
  - Pregnant women,
  - People over 65,
  - People with existing cardiovascular disease or respiratory disease,
  - Low-income communities (research has found that communities in London that have higher levels of deprivation, or a higher proportion of people from a non-white ethnic background are more likely to be exposed to higher levels of air pollution than communities in areas of lower deprivation).
- 7.10 Existing concessions to support disabled people will remain unchanged. These include free Visitor Vouchers for Carers and Resident Permits for Disabled Badge holders. Disabled Badge holders also have the right to park for three hours on a single or double yellow line and all day in a Pay by Phone bays. People who have carers are entitled to an additional free 480 visitor parking vouchers. This is an addition to 240 residents parking vouchers which are free to those over 60 years old.

## **8 OTHER STATUTORY IMPLICATIONS**

- 8.1 The contractual terms and conditions that govern resident parking permits clearly specify that the Council retains the right to amend them upon the provision of 28 days' notice. These terms and conditions are issued with each permit and published on the Council website. If the changes to the terms and conditions are approved, Officers will inform all resident permit holders of a new implementation date which gives 28 days' notice. A consultation on the changes is not a requirement.

8.2 This section of the report is used to highlight further specific statutory implications that are either not covered in the main body of the report or are required to be highlighted to ensure decision makers give them proper consideration. Examples of other implications may be:

- Best Value Implications,
- Consultations,
- Environmental (including air quality),
- Risk Management,
- Crime Reduction,
- Safeguarding.
- Data Protection / Privacy Impact Assessment.

## **9 COMMENTS OF THE CHIEF FINANCE OFFICER**

9.1 The proposed amendments to the Permit Transfer Scheme would increase eligibility for on street parking permits. It is however difficult to predict the number of additional permits that might be issued as a result of these proposed changes, and the additional permit income. This will be monitored as part of usual monthly budget monitoring.

## **10 COMMENTS OF LEGAL SERVICES**

10.1 The parking permit transfer scheme is a scheme that was introduced in 2011 to help reduce levels of over-crowding in the Borough and it is right that its operation should be kept under review. Any review of the terms of the scheme are a policy decision and the rationale for the review has been clearly stated in the Executive Summary. It is proposed that existing concessions to support disabled residents remain unaffected and an equalities impact assessment has been undertaken.

10.2 The provision of resident parking permits is contractual in nature and the existing terms allow for them to be amended on the provision of 28-days' notice. We must therefore ensure that we correctly follow any steps that are required before any changes are implemented. Any changes to the scheme will be effective immediately in respect of new applications for permits.

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## **Linked Reports, Appendices and Background Documents**

### **Linked Report**

- NONE

### **Appendices**

- Full details of the proposal changes to the PTS (appendix 1)
- Equalities Impact Assessment (appendix 2)

### **Background Documents – Local Authorities (Executive Arrangements) (Access to Information) (England) Regulations 2012**

- Cabinet Report, 3 August 2011, Introduction of a Permit Transfer Scheme
- Overview and Scrutiny Challenge Session Report, 13 December 2021, The extent to which the council's parking permit policy influences people's behaviour

**Officer contact details for documents:**

Head of Parking – Michael Darby. [Michael.darby@towerhamlets.gov.uk](mailto:Michael.darby@towerhamlets.gov.uk)

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Appendix 1 - Permit Transfer Scheme. Findings of review and proposed changes

Ref	PTS Criteria or gap identified	Key Issue	Impact	Proposal	Policy	Outcome	Risk/Issue/Concern
1	The applicant must have held an on-street parking permit for at least twelve months prior to moving in to the new property. During this twelve-month period, small breaks in holding a permit are allowed, provided that they do not exceed a total of thirty days.	The term 'prior to moving into the new property' could be misinterpreted as the new tenancy start date might be different to the actual moving in date.	The difference in days could determine whether a family qualifies for a permit under the PTS.	Remove the twelve month qualifying period.	Amendment to scheme	Better communication as the scheme will be more open, transparent and clear.	Increase in the number of on-street resident parking permits could be seen to be not aligned with the council's strategies, e.g. the Transport Strategy outcome 2: car use is reduced in favour of active, efficient, and sustainable transport.
2	The applicant must have held an on-street parking permit for at least twelve months prior to moving in to the new property. During this twelve-month period, small breaks in holding a permit are allowed, provided that they do not exceed a total of thirty days.	The term 'on-street' means that a family with an off-street parking permit does not qualify for a permit under the PTS.	Families may decide not to move because they cannot apply for a permit under the PTS.	Remove the twelve month qualifying period.	Amendment to scheme	Increase in the number of families allowed to apply for a permit under the PTS.	Families continue to live in overcrowded properties.
3	In the case of a homeless household who were placed in temporary accommodation outside the borough, the twelve-month period will be the twelve months prior to being placed outside the borough.	Some families have been placed in temporary accommodation outside the borough for more than 12 months so they would not have held a permit within the previous 12 months.	Families placed in temporary accommodation outside the borough for more than 12 months will not satisfy the qualifying period.	Remove the twelve month qualifying period.	Amendment to scheme	Increase in the number of families allowed to apply for a permit under the PTS.	Families continue to live in overcrowded properties.
4	The applicant must be living in overcrowded housing and must be moving to larger, car-free, housing provided by a registered provider or the council and which is rented at below-market-rate (excluding any rented housing falling within the intermediate housing tenure).	The criteria does not make it clear that a family must be moving from social-to-social housing.	Families living in private rented properties will not qualify for a permit under the PTS.	Amend the criteria to include families living in private rented properties.	Amendment to scheme	Increase in the number of families allowed to apply for a permit under the PTS.	Increase in the number of on-street resident parking permits could be seen to be not aligned with the council's strategies, e.g. the Transport Strategy outcome 2: car use is reduced in favour of active, efficient, and sustainable transport.
5	The PTS only applies to the resident issued with a permit under. If more than one resident satisfies the criteria then it is up to the household to decide who should apply. The other occupant then loses their right to a permit under the PTS indefinitely.	Another occupant is not allowed to apply for a permit under the PTS if the permit holder no longer needs a permit.	Families may be left in a predicament if they rely on a family car.	Amend the criteria so that another occupant will be allowed to apply for a new permit providing that one member of the Household had previously held a permit under the PTS.	Amendment to scheme	Households still retain the right to one permit under the PTS.	No change would mean one less vehicle parked on-street.
6	In order to remain eligible under the PTS, you must renew your permit on or before the expiry date.	Residents unintentionally allow their permits to expire.	This has a devastating effect on families who rely heavily on their cars.	Amend the criteria so that the permit holder is allowed to apply for a new permit if their old one expires, or they cancel it.	Amendment to scheme	Households still retain the right to one permit under the PTS.	No change would mean one less vehicle parked on-street.
7	The scheme does not include an individual or family who wants to downsize.	This prevents more families living in overcrowded or under-occupied properties from moving.	The knock-on-effect will allow families in overcrowded and under-occupied properties to move into suitable homes.	Amend the PTS to include an individual or family who want to downsize (including a mutual exchange) to a car free property.	Amendment to scheme	Increase in the number of families allowed to apply for a permit under the PTS.	Increase in the number of on-street resident parking permits could be seen to be not aligned with the council's strategies, e.g. the Transport Strategy outcome 2: car use is reduced in favour of active, efficient, and sustainable transport.

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[Title]

**Section 1: Introduction**

<b>Name of proposal</b>
For the purpose of this document, 'proposal' refers to a policy, function, strategy or project
<b>Change and amendments to the Permit Transfer Scheme (PTS) criteria</b>
<b>Service area and Directorate responsible</b>
Parking, Mobility and Market Service, Public Realm Division, Place Directorate
<b>Name of completing officer</b>
Norman Rabess
<b>Approved by (Corporate Director / Divisional Director/ Head of Service)</b>
<b>Date of approval</b>
Click or tap to enter a date.

**Where a proposal is being taken to a committee, please append the completed EIA(s) to the cover report.**

**Conclusion – To be completed at the end of the Equality Impact Analysis process**

This summary will provide an update on the findings of the EIA and what the outcome is. *For example, based on the findings of the EIA, the proposal was rejected as the negative impact on a particular group was disproportionate and the appropriate actions cannot be undertaken to mitigate risk. Or, based on the EIA, the proposal was amended, and alternative steps taken.*

*The focus of this is to analyse the impacts of the proposal on residents, service users and the wider community that are likely to be affected by the proposal. If the proposed change also has an impact on staff, the committee covering report should provide an overview of the likely equality impact for staff, residents and service users and the range of mitigating measures proposed.*

<b>Conclusion</b>	<b>Current decision rating</b> (see Appendix A)
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Draft EIA presenting evidence identified so far. Full EIA with conclusion will be produced following consultation.	TBC
<p><b>The Equality Act 2010 places a ‘General Duty’ on all public bodies to have ‘due regard’ to the need to:</b></p> <ul style="list-style-type: none"> <li>• Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act</li> <li>• Advance equality of opportunity between those with ‘protected characteristics’ and those without them</li> <li>• Foster good relations between those with ‘protected characteristics’ and those without them</li> </ul> <p>This Equality Impact Analysis provides evidence for meeting the Council’s commitment to equality and the responsibilities outlined above. For more information about the Council’s commitment to equality, please visit the Council’s <a href="#">website</a>.</p> <p><b>Section 2: General information about the proposal</b></p>	
Describe the proposal including the relevance of proposal to the general equality duties and protected characteristics under the Equality Act 2010	
<p>Review of parking permit transfer scheme. A Mayoral Pledge. The review has given us the opportunity address the gaps identified in the scheme, and day-to-day operational issues which have led to misinterpretation, misunderstanding, and complaints. Proposed amendments to the PTS are listed below.</p> <ul style="list-style-type: none"> <li>• To amend the PTS to allow a family in an overcrowded property who move to a larger free property with two or more bedrooms to retain their right to one on-street resident permit.</li> <li>• To remove the PTS criteria 3, which states ‘The applicant must have held an on-street parking permit for at least twelve months prior to moving into the new property</li> <li>• Amend the criteria to include families living in private rented properties.’</li> <li>• Amend the criteria so that another occupant will be allowed to apply for a new permit providing that one member of the household had previously held a permit under the P</li> <li>• Amend the criteria so that the permit holder is allowed to apply for a new permit if the old one expires, or they cancel it.</li> <li>• To extend the PTS to allow an individual or family in an under-occupied property who downsize to a smaller car free property to retain their right to one on-street resident permit.</li> </ul> <p><b>Assumed traffic impact of removing the Liveable Streets measures</b></p> <p>This EqIA is based on the following assumptions about the traffic impact of removing the road closures:</p>	



- The number of vehicles in the borough could increase.
- Air quality in the borough due to more vehicles on the streets may deteriorate and air pollution may increase.
- There may be less overcrowded households and less under occupying households and therefore the council can manage its resources more effectively and efficiently.

### Section 3: Evidence (consideration of data and information)

What evidence do we have which may help us think about the impacts or likely impacts on residents, service users and wider community?

#### Data was obtained from the following sources:

- 2011 Census (2021 census data by protected characteristics available 29<sup>th</sup> Nov 2022)
- Transport for London's London Travel Data Survey (LTDS)
- Department for Transport's STATS19
- Tower Hamlets Council Public Health
- Modelling data from the London Atmospheric emissions inventory (LAEI), produced by the GLA (Greater London Authority).
- Who Cares? Helping London's unpaid carers (London Assembly Labour, December 2018) [who cares - helping londons unpaid carers by dr onkar sahota am.pdf](#)
- The Council's Transport Strategy (Tower Hamlets Transport Strategy 2019-2041).
- Housing Options waiting list data for overcrowded households and under occupying households (3 beds or more).
- Parking permit type data
- [Travel in London: Understanding our diverse communities 2019 \(tfl.gov.uk\)](#)

### Section 4: Assessing the impacts on different groups and service delivery

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
<b>Protected</b>				
<b>Age</b> (All age groups)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>• Infants, young children and older people (over 65) are more likely to be vulnerable to poorer air quality.</li> <li>• If the number of vehicles in the borough increases, the number of road traffic accidents may increase. Data from TfL shows that there were 1,276 road traffic casualties in Tower Hamlets in 2021. The largest proportion of road traffic collisions involve those of working age (833). More vulnerable residents (those aged 0-15 and aged 60+) account for 8.2% of casualties.</li> </ul>

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?												
				<p>The increase of car use may contribute to road injuries of pedestrians of all age groups.</p> <div><p><b>Casualties by Age (2021)</b></p><table><thead><tr><th>Age Group</th><th>Percentage</th></tr></thead><tbody><tr><td>0-15</td><td>3.4%</td></tr><tr><td>16-24</td><td>20.0%</td></tr><tr><td>25-59</td><td>65.3%</td></tr><tr><td>60+</td><td>4.8%</td></tr><tr><td>Unknown</td><td>6.6%</td></tr></tbody></table></div> <ul style="list-style-type: none"><li>Finding parking space close to home may become more difficult for residents. This may disproportionately affect older residents who whilst not being classed as disabled may suffer reduced mobility.</li><li>The primary aim of this policy is to support the reduction of overcrowding in the borough whilst not disadvantaging residents who rely on their car if they are offered more suitably sized accommodation on a car free development. Households who rely on a car, and this can benefit all age groups, particularly older residents who have mobility difficulties.</li></ul>	Age Group	Percentage	0-15	3.4%	16-24	20.0%	25-59	65.3%	60+	4.8%	Unknown	6.6%
Age Group	Percentage															
0-15	3.4%															
16-24	20.0%															
25-59	65.3%															
60+	4.8%															
Unknown	6.6%															
<b>Disability</b> (Physical, learning difficulties, mental health and medical conditions)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"><li>Residents with a blue badge are not affected by the proposal.</li><li>Disabled people, particularly those with respiratory conditions, could be negatively impacted by a reduction in air quality if the policy leads to more vehicles in the borough. This also includes all residents who have breathing difficulties and respiratory conditions.</li><li>It is anticipated that this proposal may have a negative impact on residents with disabilities, who</li></ul>												

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
				<p>as a consequence of the proposals may not be able to find parking spaces within close proximity to their homes. This is also extended to residents with reduced mobility but who are not registered as disabled. A negative impact on road safety and air quality could also adversely affect those with an existing disability.</p> <ul style="list-style-type: none"> <li>Disabled people are more likely than non-disabled people to rely upon family members or friends for daily care. The 2011 Census indicates that over 687,000 Londoners spend at least an hour a week caring for someone – equivalent to 8.5% of the population<sup>1</sup>. Extending the right to retain a parking permit if an overcrowded or under occupying is offered accommodation on a car-free development would enable this cohort to maintain independence and mobility and support carers.</li> <li>Research undertaken by TfL indicates that disabled Londoners are less likely to walk regularly. 84% of disabled Londoners reported that their disability limits their ability to travel, reflecting that disabled Londoners travel less often than non-disabled Londoners (1.9 compared with 2.4 trips on an average weekday). The proposal to open streets to make it easier to get around by car or taxi may result in people with disabilities becoming more independent.</li> <li>Opening up the PTS to a wider population could lead to disbenefits from reduced opportunities to shift modes, and undertake regular physical exercise particularly through active travel, and from the impacts of worsened air quality.</li> </ul>
Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>Pregnant women are more likely to adversely affected by poorer air quality.</li> <li>A report by London Assembly Labour identified that women are more likely than men to do a greater share of child caring responsibilities including children to school and are therefore more exposed to increased road danger and air pollution resulting from increased traffic in the borough.</li> <li>The Tower Hamlets Annual Residents Survey (2019) found that women are more conscious than men of road</li> </ul>

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?									
				danger when choosing how to travel. A consequence of more traffic on streets may result in women being less likely to participate in active travel (cycling and walking).									
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"><li>There is no estimated direct or indirect disproportionate impact of these proposals to residents on the grounds of different gender identities.</li></ul>									
Marriage and civil partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"><li>There is no estimated direct or indirect disproportionate impact of these proposals to residents on the grounds of marriage and civil partnership status.</li></ul>									
Religion or philosophical belief	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"><li>There is no estimated direct or indirect disproportionate impact of these proposals to residents on the grounds of religion or philosophical belief</li></ul>									
Race	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"><li>People of south Asian origin over 70 in the borough are more likely to suffer from asthma compared with the white and black population of this age group. They, therefore, may be negatively impacted by a reduction in air quality.</li><li>Some communities have larger family structures and networks of support outside of their own household, the ability to continue to benefit from the use of a car may help to promote wider family and community support networks.</li><li>The primary aim of this policy is to support the reduction of overcrowding in the borough whilst not disadvantaging residents who rely on their car if they are offered more suitably sized accommodation on a car free development. The tables below show the number of overcrowded and under-occupied households by broad ethnic group (as at October 2022). BAME residents are more likely to be living in overcrowded properties; the changes to the parking transfer scheme should therefore benefit this group of residents.</li></ul> <table><tr><th>Overcrowded Applicants</th><th>No's</th><th>Average</th></tr><tr><td>Asian</td><td>4137</td><td>73%</td></tr><tr><td>Black</td><td>481</td><td>9%</td></tr></table>	Overcrowded Applicants	No's	Average	Asian	4137	73%	Black	481	9%
Overcrowded Applicants	No's	Average											
Asian	4137	73%											
Black	481	9%											

Groups	Positi ve	Negati ve	Neutr al	Considering the above information and evidence, describe the impact this proposal will have on the following groups?		
				Dual	84	1%
				Other	274	5%
				REFUSED	211	4%
				White	468	8%
				Did not complete form	2	0%
				Grand Total	5657	100%
				Under occupiers	No's	Average
				Asian	433	38%
				Black	86	8%
				Dual	17	1%
				Other	180	16%
				REFUSED	30	3%
				White	394	35%
				Did not complete form	2	0%
				Grand Total	1142	100%
Sexual orientation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"><li>A report by TfL on the barriers of using public transport found that LGB Londoners report cited barriers more frequently than the overall population. Overcrowded services, cost of travel and disruptions being the three most commonly mentioned factors. However, LGB Londoners are significantly more likely than heterosexual Londoners to have experienced incidents of unwanted sexual behaviour or hate crime. Fears of intimidation and/or abuse are sometimes mentioned by LGB Londoners as barriers for increased public transport use. The extent to which these fears affect travel behaviour depends on people's personalities, previous experiences and the degree to which they perceive themselves as being visibly LGB. For this reason, there may be a higher proportion car ownership or reliance on hire vehicles than in the population in general, however there is no data to prove this assumption.</li></ul>		
Pregnancy and maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"><li>Exposure to air pollution during pregnancy can increase the risk of stillbirth, lead to low birth weight, and may affect the child's health (especially breathing) and learning skills later in life</li><li>Residents with reduced mobility due to pregnancy/maternity may find it more difficult to park closer to their own home.</li></ul>		

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
				<ul style="list-style-type: none"> <li>The primary aim of this policy is to support the reduction of overcrowding in the borough whilst not disadvantaging residents who rely on their car if they are offered more suitably sized accommodation on a car free development. Households with children are more likely to be overcrowded than other households.</li> </ul>
<b>Other</b>				
<b>Socio-economic</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> <li>Overcrowding is more likely to be experienced by households with limited income.</li> <li>It is known that low-income communities, communities with poorer air quality, including those situated closer to Equality Impact Analysis Page 8 of 10 main roads are disproportionately more exposed to poorer air quality</li> <li>The proposal may benefit those on low incomes who may be reliant on cars. For example, those who use a car for work such as taxi or PHV drivers, and those undertaking formal or informal caring responsibilities</li> <li>Lower socio-economic residents often have poorer health outcomes than the general population. The proposals may promote car use and potentially discourage the transition towards active travel. Walking and cycling is recognised as being beneficial for health and wellbeing.</li> </ul>
<b>Parents/Carers</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> <li>The proposal could benefit unpaid and paid carers who use a car to visit clients</li> </ul>
<b>People with different Gender Identities</b> e.g. Gender fluid, Non-Binary etc	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>A report by TfL on the barriers of using public transport found that LGB Londoners report cited barriers more frequently than the overall population. Overcrowded services, cost of travel and disruptions being the three most commonly mentioned factors. However, LGB Londoners are significantly more likely than heterosexual Londoners to have experienced incidents of unwanted sexual behaviour or hate crime. Fears of intimidation and/or abuse are sometimes mentioned by LGB Londoners as barriers for increased public transport use. The extent to which these fears affect travel behaviour depends on people's personalities, previous experiences and the degree to which they perceive themselves as being visibly LGB. For this reason, there may be a higher proportion car ownership or reliance on hire vehicles than in the population in general, however there is no data to prove this assumption.</li> </ul>

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
				The proposal to open streets may support feelings of safety and security in this cohort.
Any other groups	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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## Section 5: Impact analysis and action plan

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Update on progress
Monitor impact of the proposal	Review Housing Options overcrowded and under occupiers (2 bed+); number of PTS permits issued, and complaints data to monitor any adverse impact	Monthly / Quarterly	TBC	
Gain better understanding of future impact	Develop a forward plan of relevant housing coming on stream to support projection monitoring stress on number of parking spaces	Monthly / Quarterly	TBC Housing Delivery / Planning	
Collect air quality data	Utilise existing diffusion tubes to record adverse impact on air quality	Annually (via statutory annual air quality report)	TBC Pollution Team	

## Section 6: Monitoring

What monitoring processes have been put in place to check the delivery of the above action plan and impact on equality groups?



- Data from air quality monitoring sites and the Tower Hamlets Nitrogen Dioxide Tube results.
- Monthly monitoring of complaints received regarding any impacts of the change to resident permit terms and conditions
- Housing Options data
- Parking permit data
- Regular reporting on impact of PTS to Mayor and Cabinet Member Environment and Pollution
- We will use equality data of households from Housing Options on the housing waiting list to identify whether any one group is adversely disadvantaged by this policy.

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