

# Equality Impact Analysis Template

## Section 1: Introduction

<b>Name of proposal</b>
For the purpose of this document, 'proposal' refers to a policy, function, strategy or project
One-Hour free parking for Markets
<b>Service area and Directorate responsible</b>
Parking, Mobility and Market Services. Public Realm/Place
<b>Name of completing officer</b>
Eamonn Cullinan, Parking Development Investigation Manager
<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.*

Conclusion	Current decision rating (see Appendix A)
<p>This proposal will have a positive impact on drivers generally as it will give them access to the markets with reduced costs. Holders of blue badges can already park for free. If successful the proposal is very likely to attract more vehicles to the area which will have a negative impact on Traffic Congestion, Air Quality and Road Safety and the disbenefits that brings to all groups, particularly the young, elderly, disabled and those with health conditions.</p>	<p>Amber</p>

**The Equality Act 2010 places a ‘General Duty’ on all public bodies to have ‘due regard’ to the need to:**

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between those with ‘protected characteristics’ and those without them
- Foster good relations between those with ‘protected characteristics’ and those without them

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 [website](#).

## Section 2: General information about the proposal

Describe the proposal including the relevance of proposal to the general equality duties and protected characteristics under the Equality Act 2010
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The Council has nine main Markets across the borough with varying opening times ranging from just Sundays to 6 days a week. The council is looking to protect and support these markets and introducing free parking for one hour is seen as one way to attract more customers. As well as supporting markets this proposal will also benefit those businesses in the same area as the market. The proposal seeks to boost culture, business, jobs and leisure and it is argued that reduced parking charges will help to promote visitors to markets and retain existing customers who drive and might have considered not coming because of the cost. However, the report also states that it is difficult to demonstrate a correlation between free parking and retail growth.

The report also suggests that more car journeys have negative implications for air quality, congestion, carbon emissions, road danger, inactive lifestyles and noise. Evidence shows air pollution affects everyone, but there are inequalities in exposure and the greatest impact on the most vulnerable, including older people, children, pregnant women, and those with cardiovascular disease and/or respiratory disease.

### 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?

A review carried out for London Councils in 2012

- shoppers who walk or use public transport spend more over a week or a month than car users.

Countryside Charity London

- evidence shows removing parking increases income of local businesses

LBTH Markets Improvement Plan 2022-27

- 81% of shoppers surveyed said they walked to the market with 19% driving

Public Health England

- Key groups who are vulnerable to poor air quality include: infants and young children; pregnant women; older people (over 65); people with existing cardiovascular disease or respiratory disease; low income communities.
- Short-term effects of air pollution include exacerbation of asthma and cough, wheezing and shortness of breath as short-term effects; long-term

effects stroke, lung cancer, respiratory conditions and cardiovascular disease.

#### Tower Hamlets JSNA Asthma Factsheet 2015

- Asthma is often associated with air pollution.
- 12.9% of the Tower Hamlets South Asian population who are over 70 years old have been diagnosed with asthma, compared with 8.3% of the white and 5.2% of the black population over 70 years old.

#### Modelling data from LAEI (London Atmospheric emissions inventory)

- Whilst air quality levels in the markets comply with the UK legal limit for nitrogen dioxide, this level is well above the World Health Organisation level and none of the markets meet their guidance on safe air.

Also, data included in the Transport Strategy Evidence pack includes;

#### LBTH Local Implementation 3

- The age at which residents are most likely to be injured as pedestrians in Tower Hamlets is 10-15 years and 80-84 years as measured in five-year age bands based on 2017 population against the number of average annual casualties per 1,000 population.

#### Health Impacts of cars, Mayor of London, 2015

- Car use is associated with an increased risk of obesity while walking and public transport use are associated with not being overweight or obese

#### Tower Hamlets Child Healthy Weight Action Plan 2022-24

- Rates of Year 6 children with excess weight in Tower Hamlets have increased from 41.8% in 2019/20 to 50.4% in 2020/21, significantly higher than the England average.

The 2011 Census shows that only 37% of households in Tower Hamlets have at least one vehicle. 'Walking and Cycling: the economic benefits' by TfL states that people who walk to the high street visit more regularly and spend up to 40% more than people who drive to the high street. It also states that cycle parking delivers 5x the retail spend per square metre than the same area of car parking and that people who are physically active have fewer sick days and feel more productive.

## 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 type="checkbox"/>	<p>Infants, young children and older people (over 65) are more likely to be vulnerable to poorer air quality.</p> <p>The age at which residents are most likely to be injured as pedestrians in Tower Hamlets is 10-15 years and 80-84 years as measured in five-year age bands based on 2017 population against the number of average annual casualties per 1,000 population. The increase of car use may contribute to road injuries of pedestrians of these age groups.</p>
<b>Disability</b> (Physical, learning difficulties, mental health and medical conditions)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Disabled people, particularly those with respiratory conditions, will be negatively impacted by a reduction in air quality. This also includes all residents who have</p>

				breathing difficulties and respiratory conditions.
<b>Sex</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Pregnant women are more likely to adversely affected by poorer air quality.
<b>Gender reassignment</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no estimated direct or indirect disproportionate impact of these proposals to residents on the grounds of gender reassignment.
<b>Marriage and civil partnership</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no estimated direct or indirect disproportionate impact of these proposals to residents who are married or in a civil partnership.
<b>Religion or philosophical belief</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no estimated direct or indirect disproportionate impact of these proposals to residents on the grounds of religion or philosophical belief.
<b>Race</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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, will be negatively impacted by a reduction in air quality.
<b>Sexual orientation</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no estimated direct or indirect disproportionate impact of these proposals to residents on the grounds of sexual orientation.
<b>Pregnancy and maternity</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Exposure to air pollution during pregnancy can increase the risk of stillbirth and may affect the child's health (especially breathing) and learning skills later in life.
<b>Other</b>				
<b>Socio-economic</b>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	One hour free parking may give those on lower incomes, particularly those with children, and those suffering in the cost of living crisis better access to the markets where goods are competitively priced. It will also assist those who need to drive when they are collecting heavy or bulky items. Unfortunately, the one hour free parking may also encourage those who currently use sustainable modes of transport (walking, cycling & public transport) to drive instead. It is known that low income communities, communities with poorer air quality, including those situated closer to

				main roads are disproportionately more exposed to poorer air quality.
<b>Parents/Carers</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no estimated direct or indirect disproportionate impact of these proposals for parents/carers.
People with different <b>Gender Identities</b> e.g. Gender fluid, Non-Binary etc	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no estimated direct or indirect disproportionate impact of these proposals to residents on the grounds of different gender identities.
<b>Any other groups</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



## 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
Collect usage and air quality data.	Record monthly before and after implementation	Review every 6 months	EC	



## 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?

Monthly monitoring of the usage of the parking bays with the one hour free parking facility.  
 Monthly data from the Tower Hamlets Nitrogen Dioxide Diffusion Tube Results.

## Appendix A

### EIA decision rating

Decision	Action	Risk
<p>As a result of performing the EIA, it is evident that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a Protected Characteristic under the Equality Act and appropriate mitigations cannot be put in place to mitigate against negative impact. It is recommended that this proposal be suspended until further work is undertaken.</p>	<p><b>Suspend – Further Work Required</b></p>	<p><b>Red</b></p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, there is a genuine determining reason that could legitimise or justify the use of this policy.</p>	<p><b>Further (specialist) advice should be taken</b></p>	<p><b>Red Amber</b></p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negatively impact (as described above) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing the actions detailed within the <i>Impact analysis and action plan</i> section of this document.</p>	<p><b>Proceed pending agreement of mitigating action</b></p>	<p><b>Amber</b></p> 