

[Title]

Section 1: Introduction

Name of proposal For the purpose of this document, 'proposal' refers to a policy, function, strategy or project
Change and amendments to the Permit Transfer Scheme (PTS) criteria
Service area and Directorate responsible
Parking, Mobility and Market Service, Public Realm Division, Place Directorate
Name of completing officer
Norman Rabess
Approved by (Corporate Director / Divisional Director/ Head of Service)
Date of approval
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)
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Draft EIA presenting evidence identified so far. Full EIA with conclusion will be produced following consultation.	TBC
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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

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.

- 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.
- 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
- Amend the criteria to include families living in private rented properties.’
- 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
- 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.
- 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.

Assumed traffic impact of removing the Liveable Streets measures

This EqIA is based on the following assumptions about the traffic impact of removing the road closures:

- 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 29th 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?
Protected				
Age (All age groups)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> • Infants, young children and older people (over 65) are more likely to be vulnerable to poorer air quality. • 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.

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 data-bbox="735 495 1495 1014" style="border: 1px solid black; padding: 10px;"> <p style="text-align: center;">Casualties by Age (2021)</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <caption>Casualties by Age (2021)</caption> <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"> • 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. • 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. 	Age Group	Percentage	0-15	3.4%	16-24	20.0%	25-59	65.3%	60+	4.8%	Unknown	6.6%
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<p>Disability (Physical, learning difficulties, mental health and medical conditions)</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> • Residents with a blue badge are not affected by the proposal. • 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. • It is anticipated that this proposal may have a negative impact on residents with disabilities, who 												

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"> • 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 population¹. 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. • 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. • 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.
Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> • Pregnant women are more likely to adversely affected by poorer air quality. • 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. • The Tower Hamlets Annual Residents Survey (2019) found that women are more conscious than men of road

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"> There is no estimated direct or indirect disproportionate impact of these proposals to residents on the grounds of different gender identities. 									
Marriage and civil partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> There is no estimated direct or indirect disproportionate impact of these proposals to residents on the grounds of marriage and civil partnership status. 									
Religion or philosophical belief	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> There is no estimated direct or indirect disproportionate impact of these proposals to residents on the grounds of religion or philosophical belief 									
Race	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> 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. 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. 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. <table border="1"> <thead> <tr> <th>Overcrowded Applicants</th> <th>No's</th> <th>Average</th> </tr> </thead> <tbody> <tr> <td>Asian</td> <td>4137</td> <td>73%</td> </tr> <tr> <td>Black</td> <td>481</td> <td>9%</td> </tr> </tbody> </table>	Overcrowded Applicants	No's	Average	Asian	4137	73%	Black	481	9%
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Sexual orientation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> 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. 																																													
Pregnancy and maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> 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 Residents with reduced mobility due to pregnancy/maternity may find it more difficult to park closer to their own home. 																																													

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				<ul style="list-style-type: none"> 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.
Other				
Socio-economic	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> Overcrowding is more likely to be experienced by households with limited income. 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 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 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.
Parents/Carers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> The proposal could benefit unpaid and paid carers who use a car to visit clients
People with different Gender Identities e.g. Gender fluid, Non-Binary etc	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> 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.

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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