

EQUALITY IMPACT ASSESSMENT

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

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act;
- Advancing equality of opportunity between those with a 'relevant protected characteristic' and those without one;
- Fostering good relations between those with a 'relevant protected characteristic' and those without one.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protect characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

Stage 2 – Full Equality Impact Assessment

An EqIA provides evidence for meeting the Council's commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.

Please read the Council's Equality Impact Assessment Guidance before beginning the EqIA process.

1. Responsibility for the Equality Impact Assessment						
Name of proposal	Parking permit and Charges Report (ULEZ					
	Readiness)					
Service area	Operations					
Officer completing assessment	Greville Percival					
Equalities/ HR Advisor	Hugh Smith					
Cabinet meeting date (if applicable)	March 2020					
Director/Assistant Director	Stephen McDonnell, Director of					
	Environment and Neighbourhoods					

2. Summary of the proposal

Please outline in no more than 3 paragraphs

- The proposal which is being assessed
- The key stakeholders who may be affected by the policy or proposal
- The decision-making route being taken

ULEZ Readiness Report

The Parking permit and Charges (ULEZ Readiness) Report identifies several measures outlined in the 2019 *Parking Transformation Programme* designed to provide accessible parking for all users, discourage unnecessary use of private vehicles, and encourage more use of sustainable travel modes. The main elements of the policy that are subject to this EqIA are:

- Diesel Surcharge and a charge increase on each of the current parking permit CO2 bandings
- Incrementally increased permit charges for 2nd and additional vehicles to discourage private car use and encourage transition to use of lower-polluting vehicles. To offset any disadvantage to Disabled Blue Badge holders, a free resident parking permit will be available for use in their home CPZ
- A £20 administration fee on parking permit refunds.
- Limit on issue of visitor permits on match and event days at Tottenham Hotspur Stadium (THS) to tackle the problem of re-selling of these.

The Ultra-Low Emission Zone (ULEZ) was introduced in central London in April 2019 and will be extended up to the North Circular Road in 2021. Many motorists commuting into central London who previously parked in the inner London area, are now using boroughs outside the current ULEZ zone to park and then use the Tube to travel to central London. Thus Haringey's protective measures such as multicar and diesel surcharges are important – especially around transport hubs in Wood Green and Tottenham in order to have a real effect in reducing vehicular pollution

Key Stakeholders

Key Stakeholders comprise all residents and those who need to use public highway parking facilities and pay to park bays. Key stakeholders also comprise those who use public transport, walk, and cycle - including Haringey residents, businesses and services. Those with disabilities, young children, expectant mothers, and older people are groups most at risk from toxic air pollutants and who will benefit from lower air pollution levels.

The *Parking permit and Charges Report (ULEZ Readiness)* will be submitted to Cabinet for approval in March 2020.

3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis. Please include any gaps and how you will address these

This could include, for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.

Protected group	Service users	Staff
Sex	Haringey Equalities Profile <u>http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</u> GLA London Ward Profiles https://londondatastore-upload.s3.amazonaws.com/instant-atlas/ward-profiles- html/atlas.html	No impac t
Gender Reassignme nt	Haringey Equalities Profile http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf	No impact
Age	Haringey Equalities Profile <u>http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</u> <u>GLA London Ward Profiles</u> <u>https://londondatastore-upload.s3.amazonaws.com/instant-atlas/ward-profiles- <u>html/atlas.html</u> TfL Roads Taskforce Technical note 12: <u>http://content.tfl.gov.uk/technical-note-12-how-</u> many-cars-are-there-in-london.pdf</u>	No impact
Disability	Haringey Equalities Profile <u>http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</u>	No impact
Race & Ethnicity	Haringey Equalities Profile <u>http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities profile of haringey.pdf</u>	No impact
Sexual Orientation	Haringey Equalities Profile <u>http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</u>	No impact
Religion or Belief (or No Belief)	Haringey Equalities Profile <u>http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_harin_gey.pdf</u>	No impact
Pregnancy & Maternity	Census 2011 TfL Roads Taskforce Technical note 12: <u>http://content.tfl.gov.uk/technical-note-12-how-</u> <u>many-cars-are-there-in-london.pdf</u>	No impact
Marriage and Civil Partnership	Haringey Equalities Profile <u>http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</u>	No impact

Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?

Explain how you will overcome this within the proposal.

Further information on how to do data analysis can be found in the guidance.

Equalities monitoring data is not available for holders of parking permits. Data is not captured at the application stage for any permits. However, given that residents in any property in a CPZ who keep and use a vehicle are eligible for residential and visitor permits, ward level data from sources such as the Office

for National Statistics (ONS) are used for the purpose of examining the impact on different protected groups. We also use public and statutory consultations to help identify issues affecting protected groups.

- **Sex** Women make up 50.5% of Haringey's population.
- **Gender Reassignment** This data is not held at a borough level. The Equality and Human Rights Commission estimate that there are between 300,000-500,000 transgender people in the UK
- **Age** Haringey has a relatively young population a quarter of the population is under the age of 20. At borough level, this age group accounts for 4% of the population.
- **Disability** 14% of residents have a long term health problem that limits their day to day activity, lower than England but in line with London.
- Race and Ethnicity Haringey is the 5th most ethnically diverse borough in the country and is the third highest London Borough for in-migration from Eastern European countries. Over 65% of residents come from non-White British communities, compared to 20% in England, 55% for London and nearly 81% of our school children.
- Sexual Orientation 3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013 (ONS Integrated Household Survey). In Haringey this equates to 6,500 residents.
- **Religion** Haringey is one of the most religiously diverse places in the UK. The most common religion was Christianity, accounting for 45% of residents, less than London (48.4) and less than England (59.4%). The next most common religions were Muslim (14.3%), Jewish (3%). Hindu (1.8%) and Sikh (0.3%). 25% of Haringey residents stated that they did not have a religion, This compares with 21% for London.
- Marriage and Civil Partnership Haringey has a higher proportion of couples in a registered same sex civil partnership than England and London. 0.6% (or 1,191 residents), compared to 0.2% for England and 0.4% for London.

Haringey is one of the most deprived areas of the UK (24th out of 236). Job Seekers Allowance claimants are the 2nd highest in London. Therefore, some low-income households will struggle with the cost of car ownership if they drive older, higher polluting vehicles due to the financial implications for them of the ULEZ charge.

Impact on Service Users / Inequalities Identified

Sex

<u>Diesel Surcharge and a charge increase on each of the current parking permit CO2 bandings</u> The surcharge will actively discourage vehicles with high emissions and thereby improve air quality and reduce health inequalities. Consultation feedback confirms that all residents - especially women - feel safer when streets are not crowded with parked vehicles.

Incrementally increased permit charges for 2nd and additional vehicles

Positive impact is expected by discouraging households who operate multiple vehicles from contributing to local air pollution and from taking up excessive parking spaces.

Limit on issue of Tottenham Event Day (TED) Visitor Permits

There is no evidence that a limit on issue of visitor permits will have any disproportionate or disadvantageous effect on the basis of sex.

Gender Reassignment

There is no evidence or published information to indicate either positive or negative impact on people transitioning gender as a result of the proposals in the Report. The Equality and Human Rights

Commission estimate that there are between 300,000-500,000 transgender people in the UK but Haringey does not hold data on how many people in the borough identify as transgender.

<u>Diesel Surcharge and a charge increase on each of the current parking permit CO2 bandings</u> It is anticipated that people with this protected characteristic will not be negatively or differentially affected by incrementally increased parking charges for multiple vehicles or the introduction of a diesel surcharge or increased charges for higher polluting (CO2) vehicles

<u>Incrementally increased permit charges for 2nd and additional vehicles</u> It is anticipated that people with this protected characteristic will not be negatively or differentially affected by increased charges for multiple vehicle ownership

<u>Limit on issue of Tottenham Event Day (TED) Visitor Permits</u> There is no evidence that a limit on issue of visitor permits on match ad event days will have disproportionate or disadvantageous effect in terms of gender reassignment.

<u>Age</u>

Diesel Surcharge and a charge increase on each of the current parking permit CO2 bandings increased charges and permit prices will negatively impact on older residents who are more likely to have mobility issues, drive older and diesel vehicles, and who rely on regular family/carer visits and will therefore need to purchase significant quantities of Visitor Permits. However, both older people and young children will benefit from measures designed to discourage high pollutant vehicles and encourage sustainable travel modes. The main benefits will be in terms of improved health as a result of better air quality. Haringey's Air Quality Action Plan sets out how older people and younger people are more vulnerable to the effects of air pollution. The Air Quality Action Plan can be accessed here: http://www.minutes.haringey.gov.uk/documents/s112468/Appendix%20B%20Haringey%20Final%20AQA P%202019-24%2028.10.19.pdf

Incrementally increased permit charges for 2nd and additional vehicles

There is no evidence to suggest that people with this protected characteristic will be negatively or differentially affected by increased charges for multiple vehicle ownership.

Limit on issue of Tottenham Event Day (TED) Visitor Permits

There is no evidence that a limit on issue of visitor permits on match and event days will have disproportionate or disadvantageous effect in terms of age. Consultation feedback shows that a lack of action will result in growth of unauthorised visitor parking, which would disproportionately affect older residents and those with mobility impairments who cannot walk far and need to park close to home

Disability

Diesel Surcharge and a charge increase on each of the current parking permit CO2 bandings While increased charges will affect those who may have to use older, higher polluting vehicles, this is offset by the fact that motorists with disabilities (including hidden disabilities) can apply for a Blue Badge and will also be entitled to a free resident parking permit. Disabled residents who require family and carer visits will be disadvantaged if they need to buy increased quantities of higher priced visitor permits.

Incrementally increased permit charges for 2nd and additional vehicles

There is no evidence that people with this protected characteristic will be negatively or differentially affected by increased charges for multiple vehicle permits. Furthermore, if a member of a household is a Blue Badge holder their resident permit will not result in other family members having to pay an incremental increased permit charge.

Limit on issue of Tottenham Event Day (TED) Visitor Permits

There is no evidence to suggest any disadvantage or negative impact. The restrictions on issue of Event Day visitor permits are likely to have some positive impact by reducing the number of non-local vehicles parked in residential streets. The positive aspect is that less parking congestion will make it easier for disabled and mobility impaired residents to have visitors and service calls as a result of there being more parking space available.

Race and Ethnicity

Diesel Surcharge and a charge increase on each of the current parking permit CO2 bandings BAME communities in Haringey are concentrated in areas that have higher than average levels of air pollution. As an indication, the proportion of non-White British communities is 83% in Northumberland Park, compared with 35% in Muswell Hill, and Haringey's Air Quality Action Plan sets out the relative levels of air pollution in these two wards and demonstrates that levels are higher in Northumberland Park. The Air Quality Action Plan can be accessed here:

http://www.minutes.haringey.gov.uk/documents/s112468/Appendix%20B%20Haringey%20Final%20AQA P%202019-24%2028.10.19.pdf. It is therefore expected that this group will benefit from the measures to discourage high polluting vehicles, as this will improve air quality and reduce these communities' exposure to pollution.

Haringey's Borough Plan EqIA reports that BAME groups are more likely than others to be earning below the London living wage, and to be in receipt of benefits. Groups with lower incomes may be negatively impacted by the increase in parking costs and will be impacted if they need to drive a more polluting car because they will be less able to afford lower polluting and electric vehicles.

Incrementally increased permit charges for 2nd and additional vehicles

This measure will also offer positive impact by reducing the number of older high polluting vehicles on the roads including those in multicar households.

Limit on issue of Tottenham Event Day (TED) Visitor Permits

BAME communities are overrepresented in Northumberland Park, where THFC Stadium is located, relative to Haringey and London (in Northumberland Park, Haringey's Borough Plan EqIA notes there is a slightly larger proportion of residents of Black ethnicity (40%) compared to people of White ethnicity (39%)). In Tottenham Hale, Bruce Grove and Tottenham Green, more than half of the population is BAME. BAME communities will benefit from this measure which will reduce parking congestion associated with the THFC stadium, as well as non-local and commuter parking in residential streets around the main transport hubs. Reduced parking and traffic congestion also offers benefits in terms of cleaner air.

Sexual Orientation

Diesel Surcharge and a charge increase on each of the current parking permit CO2 bandings 3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013 (ONS Integrated Household Survey). In Haringey this equates to around 7000 residents. There are no statistics or other evidence to suggest that LGBTQ individuals would be negatively or positively affected by the charges. There are disadvantages to all residents faced with increased permit charges if they drive high polluting or diesel cars, but there is no disproportionate or differential effect based on this protected characteristic.

Incrementally increased permit charges for 2nd and additional vehicles

All residents should benefit from the improvements which tackle obstructive and illegal parking as well as parking by non-local vehicles which reduces parking space for residents. There is no indication of any differential effect on this protected group, and there could be some positive impact in terms of street safety

Limit on issue of Tottenham Event Day (TED) Visitor Permits

The Council does not hold data to indicate that LGBTQ+ people are over-represented or underrepresented among the residents of the area affected by this change. There is no expected disadvantage or differential effect on this protected group

Religion and Belief

<u>Diesel Surcharge and a charge increase on each of the current parking permit CO2 bandings</u> There is no indication of any adverse or disproportionate impact on faith groups as a result of changes to pricing policy. As with all residents there will be benefits from improved air quality and fewer polluting vehicles on the streets

Incrementally increased permit charges for 2nd and additional vehicles

Faith groups should not be adversely or disproportionately impacted by this or any aspects of the ULEZ readiness programme.

Limit on issue of Tottenham Event Day (TED) Visitor Permits

There is no expected disadvantage or differential effect based on this protected characteristic. Reduced parking congestion on event days will more likely be of some benefit for those attending places of worship. Haringey's Borough Plan EqIA reports Northumberland Park, White Hart Lane and Tottenham Hale have the highest proportions of residents practicing a religion. Christians and Muslims are the largest proportion practicing religion, and therefore this measure may have some benefit.

Pregnancy and Maternity

<u>Diesel Surcharge and a charge increase on each of the current parking permit CO2 bandings</u> Expectant mothers and those caring for young babies will benefit from this measure to cut pollution and parking congestion. Long term exposure to air pollution is associated with low birthweight (which leads to a higher risk of complications and long-term health effects). While expectant mothers may not be able to access all of the opportunities available from measures designed to reduce car use, they and babies and young children will benefit from improvements in air quality

<u>Incrementally increased permit charges for 2nd and additional vehicles</u> By reducing the number of high polluting vehicles on streets, this measure will also provide positive impact in terms of improved air quality and healthier streets

Limit on issue of Tottenham Event Day (TED) Visitor Permits There is no expected disadvantage or differential effect on this protected group

Marital status and Civil Partnership

The 2011 Census indicated that Haringey had a higher proportion of couples in a registered same sex civil partnership than England and London. The ULEZ Readiness programme will not cause adverse or differential impact on people in marriages or civil partnerships. People in marriages and in civil partnerships will be treated the same in all aspects of the programme.

4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

Please outline which groups you may target and how you will have targeted them

Further information on consultation is contained within accompanying EqIA guidance

Public consultations are conducted regularly in-house on individual projects undertaken by Operations Traffic Management on the introduction of measures in the ULEZ Readiness programme. Consultation reviews are planned across the borough including a full assessment of parking issues and needs in order to identify what changes or improvements may be needed. Our policy on all highways and parking consultations is to encourage residents and businesses to comment not only on proposed measures but more generally on issues affecting the street scene environment and the feedback received has informed measures in the ULEZ Readiness Programme. Appropriate steps are taken to ensure that all consultations are inclusive.

Market research studies including Tottenham Quality of Life Survey, Turnpike Lane Shopping Survey and Green Lanes District Scheme Surveys will continue to inform the council of equalities issues and concerns that are important for residents' quality of life.

Future consultations will include analysis of views by protected characteristics as a means of monitoring the introduction of measures defined by the Parking Transformation Programme and actioned by the Parking Action Plan and the current ULEZ Readiness programme.

4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

Explain how will the consultation's findings will shape and inform your proposal and the decision making process, and any modifications made?

Parking consultation results confirm that residents value the ability offered to park close to home and not have to walk long distances to get to and from their cars especially when carrying heavy shopping or accompanied by small children. The consultations also confirm that residents feel safer walking on roads which are not heavily parked because clearer roads give improved visibility and residents report feeling safer as a result.

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.

Further information on assessing impact on different groups is contained within accompanying EqIA guidance

1. Sex

Women are more likely than men to be primary carers to young children, and more likely than men to head single parent households. They therefore may be negatively impacted by increases in parking permit costs; however, they will benefit from reduced air pollution. Carers to young children will be encouraged to take advantage of more sustainable travel options including public transport

Positive	Х	Negative	Х	Neutral	Unknown	
				impact	Impact	

2. Gender reassignment

There is insufficient data on people undergoing or who have undergone gender reassignment; however it is anticipated that the impact on people undergoing or who have undergone gender reassignment will be the same as for people who do not share this protected characteristic.

Positive	Negative	Neutral	Unknown	Х
		impact	Impact	

3. Age

Younger and older age groups will derive considerable health benefits from less traffic congestion, less pollution, and safer roads. Older people who rely more on car use will benefit from parking controls which make it easier to park close to home facilitate visits from family and carers.

Older people are more likely to be dependent on cars for travel, particularly as they are also more likely to have a disability. Older people may therefore be negatively impacted by reduction in private car use as a result of permit surcharges for older and higher polluting vehicles. The ULEZ Readiness programme does not aim to eliminate car use but to encourage use of less polluting vehicles.

Positive	Х	Negative	Х	Neutral	Unknown	
				impact	Impact	

4. Disability

Disabled people will benefit from lower pollution levels, safer streets and reduced parking congestion.

However, restrictions on visitor permits may adversely impact individuals with disabilities who require a higher than average number of carer and family visits. Allocated disabled bays and free issue of a resident permit to Blue Badge holders will have positive impact. The ULEZ Readiness programme will be monitored through consultations and these consultations will seek to identify and differential impact on individuals with disabilities.

Positive	X	Negative	Х	Neutral	Unknown	
				impact	Impact	

5. Race and ethnicity

This group are particularly vulnerable to poor air quality due to the overrepresentation of BAME communities in areas in Haringey where pollution levels are high. They will benefit accordingly from improvements in air quality and modal shift. However, those on low incomes, who are more likely to be from BAME communities, who drive higher polluting vehicles will be disadvantaged by increased permit prices.

Positive	Х	Negative	Х	Neutral	Unknown	
				impact	Impact	

6. Sexual orientation

It is anticipated that the impact of ULEZ Readiness measures on people who identify as LGB will be the same as for people who do not share this protected characteristic.

Positive	Negative	Neutral	Х	Unknown	
		impact		Impact	

7. Religion or belief (or no belief)

It is anticipated that faith and religious groups will be overrepresented among those who benefit from improvements in air quality and from parking controls that facilitate access to places of worship.

Positive	X	Negative	Neutral	Unknown	
			impact	Impact	

8. Pregnancy and maternity

Pregnant women and women with babies younger than 6 months old are more likely to be reliant on cars for travel. They therefore may be negatively impacted by increase in parking permit costs. However, expectant mothers and mothers up to 6 months after birth will benefit from better air quality, and less congested streets. Overall the ULEZ Readiness programme will have a positive impact on this group.

Positiv	/e X	Negative	Х	Neutral	Unknown	
				impact	Impact	

9. Marriage and Civil Partnership

It is anticipated that the impact of these recommendations on people in a civil partnership will be the same as for people who are married.

Positive	Negative	Neutral impact	X	Unknown Impact
Older BAME people r permits, but it is worth	n noting that they will a	d by the diesel surc also benefit more fi	harge and i om lower ai	ncreased prices for visitor
 Could the p that shares Will the prop who share a This include a) Rema Equa b) Take that a C) Enco life o dispr Will the prop 	the relevant protect posal help to advar relevant protected es: ove or minimise disa lity Act steps to meet the ne are different from the urage persons prote r in any other activity oportionately low	ny direct/indirect ted characterist ince equality of o d characteristic a dvantage suffere eeds of persons p eneeds of other g ected under the Ee y in which particip	t discrimin ics? pportunity and those d by persor rotected ur roups quality Act pation by se between g	hation for any group y between groups who do not? Ins protected under the inder the Equality Act to participate in public uch persons is groups who share a
	Programme is not co the protected charac		n any direct	/indirect discrimination for
residents will benefit health from improved impact of increased p	air quality; and safer a arking charges which represents a step tow	ffic congestion and streets. These are do impact on low i	l high polluti seen as mi ncome grou	ng vehicles; improved

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?

Further information on responding to identified impacts is contained within accompanying EqIA guidance

Outcome					
No major change to the proposal: the EqIA demonstrates the proposal is robust					
and there is no potential for discrimination or adverse impact. All opportunities to					
promote equality have been taken.					
Adjust the proposal: the EqIA identifies potential problems or missed	N				
opportunities. Adjust the proposal to remove barriers or better promote equality.					

Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.

Impact and which relevant protected characteristics are impacted?	Action	Lead officer	Timescale
Reducing the reliance on the private car (resulting from permit surcharges for polluting vehicles will affect older people and older BAME residents, and women who are more likely to rely on cars	Provide options for choosing more sustainable modes of transport and also use public consultations to collect views from those who do need to use cars to identify any problems	Head of Operations	Ongoing
Resident permit surcharges for higher polluting vehicles and extension of parking charges can impact adversely on those who rely on regular visits from family and from carers, especially if they have to buy large numbers of visitor permits	The needs of those affected will be addressed in further consultations and reviews on the operation of controlled parking zones - specifically including having reduced operating hours in Controlled Parking Zones. Dates of consultations will be defined and agreed by the Head of Service who will also require that Consultations include provision for these requirements	Head of Operations	Ongoing

6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:

The impact will be monitored through feedback from residents, consultations, ward councillors and other representative groups.



Please contact the Policy & Strategy Team for any feedback on the EqIA process.