

Enfield Equality Impact Assessment (EqIA)

Introduction

The purpose of an Equality Impact Assessment (EqIA) is to help Enfield Council make sure it does not discriminate against service users, residents and staff, and that we promote equality where possible. Completing the assessment is a way to make sure everyone involved in a decision or activity thinks carefully about the likely impact of their work and that we take appropriate action in response to this analysis.

The EqIA provides a way to systematically assess and record the likely equality impact of an activity, policy, strategy, budget change or any other decision.

The assessment helps us to focus on the impact on people who share one of the different nine protected characteristics as defined by the Equality Act 2010 as well as on people who are disadvantaged due to socio-economic factors. The assessment involves anticipating the consequences of the activity or decision on different groups of people and making sure that:

- unlawful discrimination is eliminated
- opportunities for advancing equal opportunities are maximised
- opportunities for fostering good relations are maximised.

The EqIA is carried out by completing this form. To complete it you will need to:

- use local or national research which relates to how the activity/ policy/ strategy/ budget change or decision being made may impact on different people in different ways based on their protected characteristic or socio-economic status;
- where possible, analyse any equality data we have on the people in Enfield who will be affected eg equality data on service users and/or equality data on the Enfield population;
- refer to the engagement and/ or consultation you have carried out with stakeholders, including the community and/or voluntary and community sector groups you consulted and their views. Consider what this engagement showed us about the likely impact of the activity/ policy/ strategy/ budget change or decision on different groups.

The results of the EqIA should be used to inform the proposal/ recommended decision and changes should be made to the proposal/ recommended decision as a result of the assessment where required. Any ongoing/ future mitigating actions required should be set out in the action plan at the end of the assessment.

Section 1 – Equality analysis details

| | |
|---|--|
| Title of service activity / policy/ strategy/ budget change/ decision that you are assessing | Introducing the proposed Bowes East Controlled Parking Zone |
| Team/ Department | Highways, Traffic & Parking (David Taylor) |
| Executive Director | Simon Pollock |
| Cabinet Member | Cllr Rick Jewell |
| Author(s) name(s) and contact details | Jonathan Goodson jonathan.goodson@enfield.gov.uk |
| Committee name and date of decision | |

| | |
|---|-----------------------|
| Date the EqIA was reviewed by the Corporate Strategy Service | 11.09.23 |
| Name of Head of Service responsible for implementing the EqIA actions (if any) | David B Taylor |
| Name of Director who has approved the EqIA | Doug Wilkinson |

The completed EqIA should be included as an appendix to relevant EMT/ Delegated Authority/ Cabinet/ Council reports regarding the service activity/ policy/ strategy/ budget change/ decision. Decision-makers should be confident that a robust EqIA has taken place, that any necessary mitigating action has been taken and that there are robust arrangements in place to ensure any necessary ongoing actions are delivered.

Section 2 – Summary of proposal

Please give a brief summary of the proposed service change / policy/ strategy/ budget change/project plan/ key decision

Please summarise briefly:

What is the proposed decision or change?

What are the reasons for the decision or change?

What outcomes are you hoping to achieve from this change?

Who will be impacted by the project or change - staff, service users, or the wider community?

Summary of Proposal

The Council is in the process, as of summer/autumn 2023, of adopting a new policy position on controlled parking zones (CPZs). It has identified a strong policy platform supporting their placement on the public road network, as a means to best manage finite kerbside space and unlock benefits around greater use, across the community, of active and sustainable travel modes.

Schemes are predicated upon selling parking permits - with prices set uniformly across the borough at relatively modest levels – to car owners living within the zone, prohibiting use of its kerbside parking space during strategic periods by other drivers. Deterring daily commuter car trips, many of them short in distance, is a key aim, as cars are the least space-efficient form of travel. Private car use is also the mode of travel that contributes most to unwelcome factors such as traffic-dominance and noise.

Accordingly, the Council seeks to introduce permit parking zones on a more widespread and proactive basis, going forward. Rather than scheme work arising only in response to petitions or other clear public expressions of demand, schemes would be positively considered in any of the following circumstances:

- a) Where there is an outstanding commitment to take forward a CPZ.
- b) Where a CPZ would help achieve a mode shift in favour of active travel and/or public transport, either on its own or as part of a wider package of measures.
- c) Where a CPZ would facilitate the delivery of new housing or employment.
- d) Where a CPZ would help address an existing parking problem, where on-street parking stress exceeds 85%.

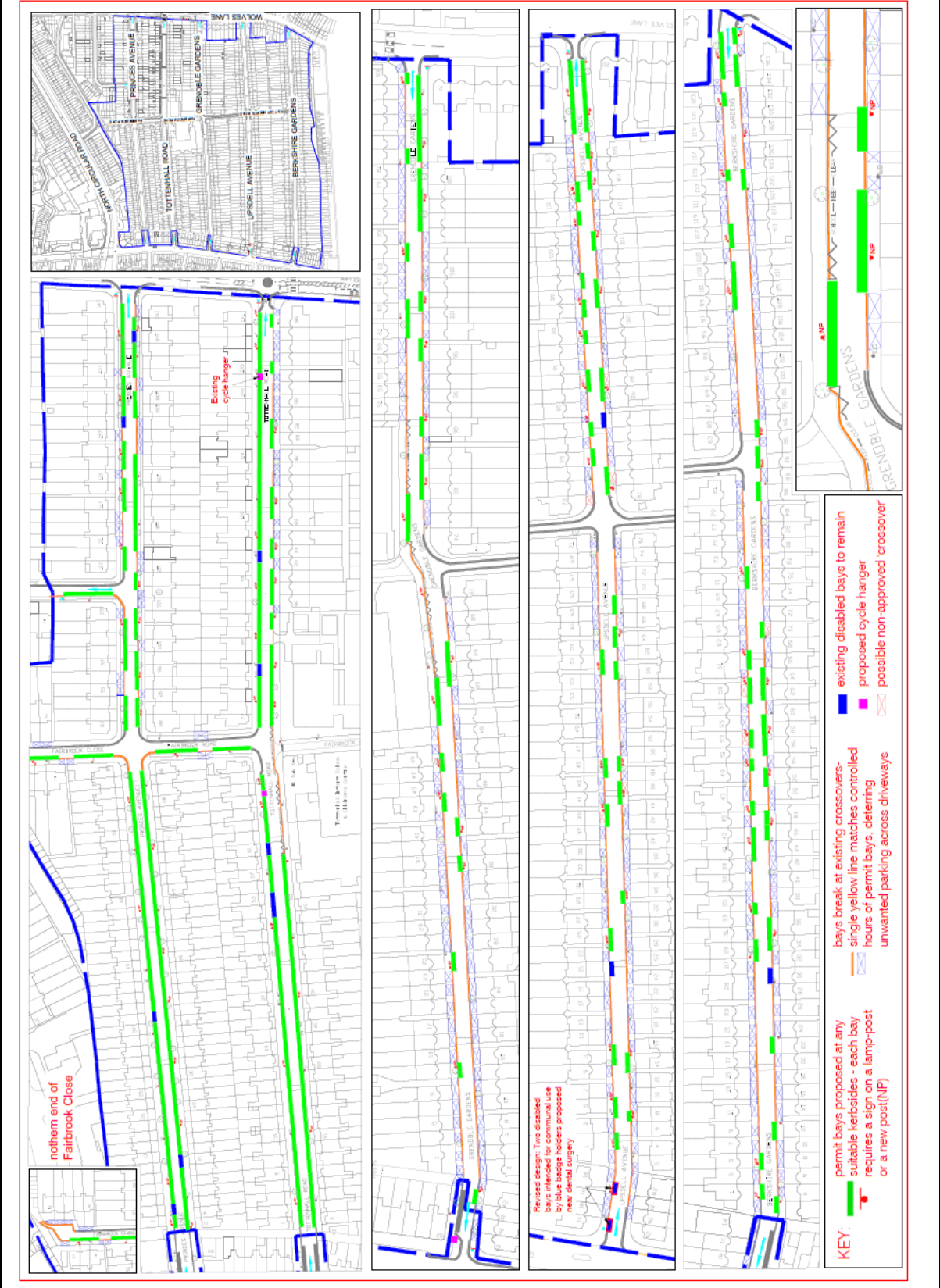
This equality impact assessment addresses the specific proposal for a new parking zone across the roughly 700 homes of the Bowes East area, operating weekdays only, 11am to 1pm.

Bowes East CPZ falls under the category of a scheme around which commitments have already been given. The decision to proceed to the statutory stage of consultation in April 2023 indicated the intent of the Council to bring a scheme about, subject to the consideration of statutory stage objections. But other factors listed above also apply to this particular proposal.

A key consideration with any zonal parking scheme – when thinking of the effects on protected groups - is around **(i) the affordability of the annual permits** that car-owners would henceforth need to purchase in order to leave their vehicles in the on-street bays.

In order to facilitate domestic visitor activity, **(ii) a visitor permit system** must also be introduced. These too represent a cost to the resident (or to their visitor, if they choose to reimburse the resident), albeit those costs are very modest. A related consideration is therefore around the affordability of visitor permits and the potential of zonal parking controls to hinder or deter visitors to vulnerable people for the purpose of care-giving or providing company or otherwise promoting their wellbeing.

The area in question is seen below:



Contextual Information Around Car Ownership and Parking Arrangements

Part 1 - All of London

Analysis by TfL¹ indicates that the following factors are most closely associated with higher than average car ownership:

- living in outer London;
- lower levels of public transport accessibility;
- higher income;
- children in the household;
- more than one adult in the household;
- in full time employment;
- Western European nationality.

At an individual level, car ownership varies by age and gender.

- Broadly, car ownership increases with age up to around 50-60 years old and then declines beyond that.
- On average, 46 per cent of men and 34 per cent of women have access to a car in London.
- Across all age bands, car ownership is lower amongst women, with this gap increasing beyond age 40.

Car ownership also varies with ethnicity:

- Car ownership is highest amongst London residents of White ethnic origin, with car ownership around a third lower amongst Black and Mixed or Other ethnic groups.
- Asian families are more likely than other ethnic minority groups to own a car, although car ownership patterns vary substantially between different groups within the 'Asian' categorisation.

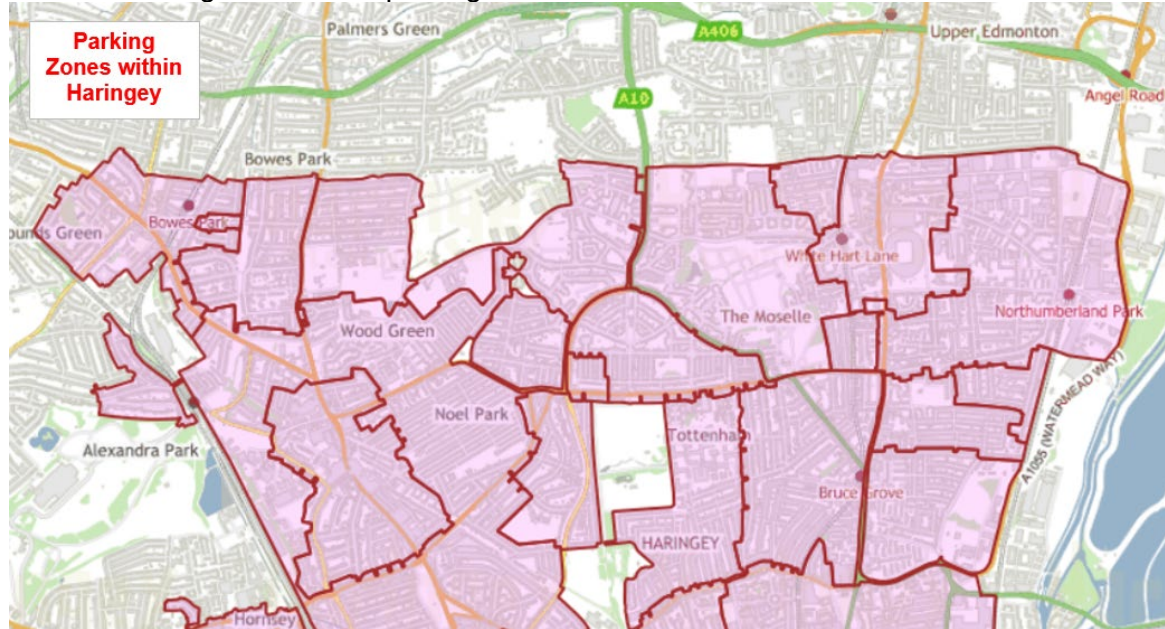
Multi-generational households

- Many minority ethnic groups in the UK have greater proportions of multigenerational households compared with the White ethnic group. Which may mean that they are more likely to have multiple cars at one property.
<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/families/adhocs/12005householdsbyagecompositionandethnicityuk2018>

¹ <https://content.tfl.gov.uk/technical-note-12-how-many-cars-are-there-in-london.pdf>

Part 2 – Neighbouring Areas

Haringey, to the south, has a dense coverage of permit parking zones, with few built up areas not falling under zonal parking controls.



Part 3 – Enfield

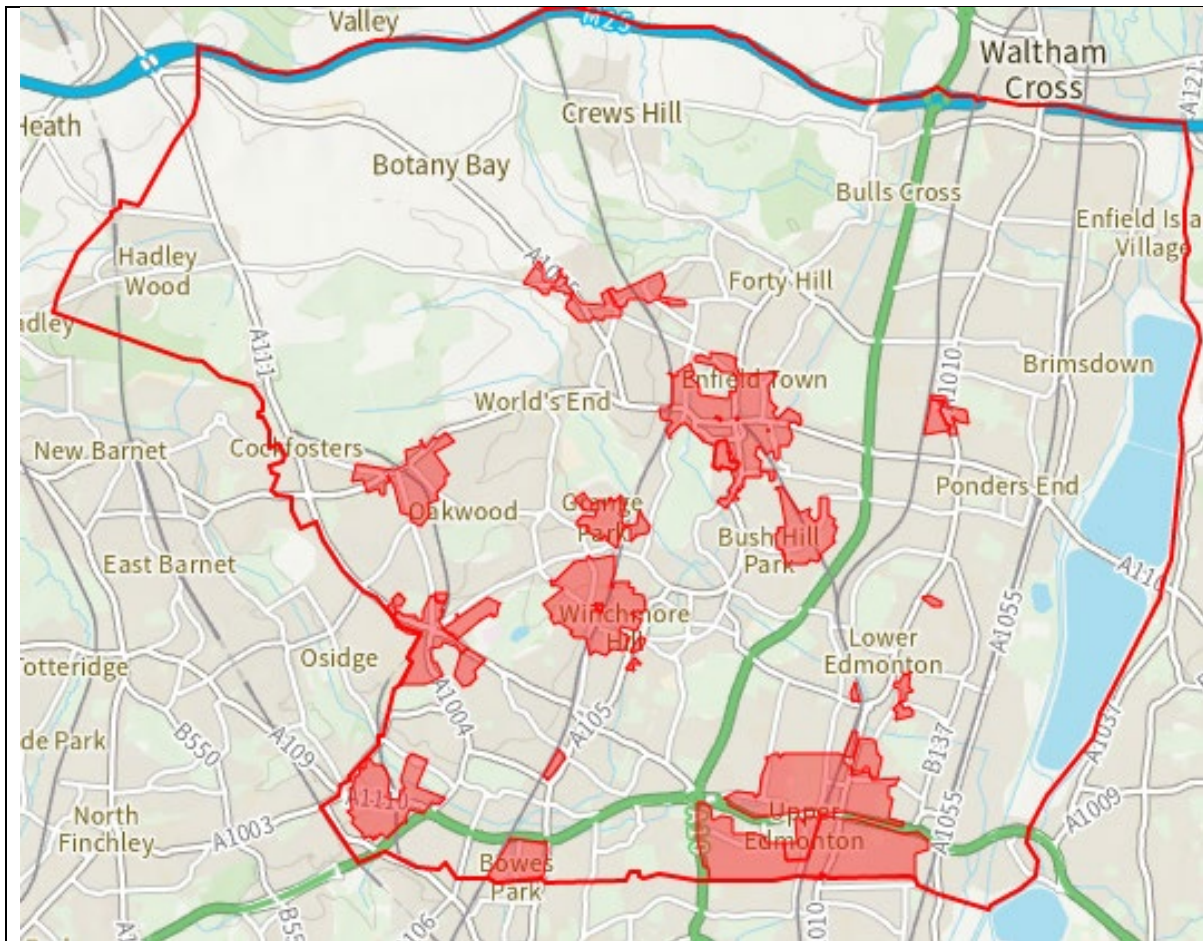
Data around local car ownership levels from the 2021 census is not yet available. However, the 2011 census gives insight into the prevailing level of car ownership, as seen below, as featured in the latest borough profile published on the Council's website. Roughly one third of households in the borough do not have access to a car or van.

The 2011 Census data⁴⁹ on cars available to households indicates that car ownership levels are about what would be expected for an outer London borough:

| Number of households with: | Enfield - Number | Enfield % | Outer London % | London % | England % |
|----------------------------|------------------|-----------|----------------|----------|-----------|
| No cars or vans | 38,933 | 32.5 | 30.7 | 41.6 | 25.8 |
| 1 car or van | 51,872 | 43.3 | 44.4 | 40.5 | 42.2 |
| 2 cars or vans | 21,997 | 18.3 | 19.3 | 14.0 | 24.7 |
| 3 or more cars or vans | 7,114 | 5.9 | 5.6 | 3.9 | 7.4 |

Data regarding the protected characteristics of permit holders across Enfield's current parking zones is not currently held.

Currently, around 15% of the borough falls with a CPZ, as shown in the Council's mapping seen below:



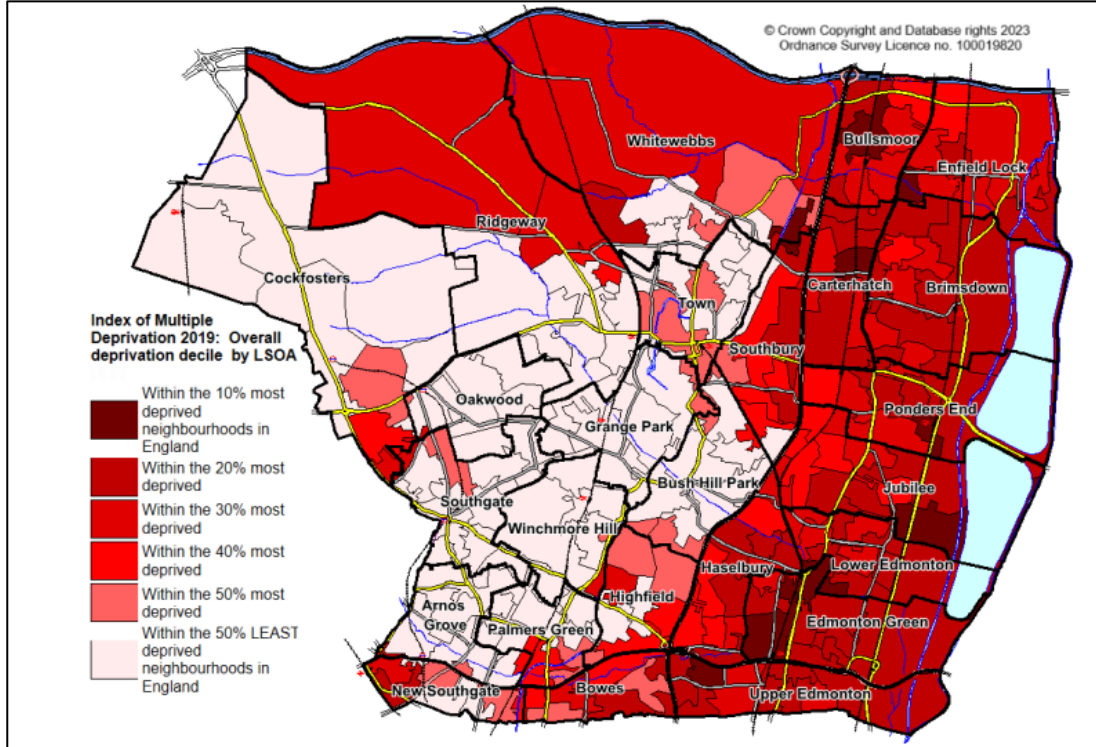
Demographic Information About Bowes

Summary

| | Bowes | Enfield | Source |
|---|--------|---------|--------------------------------------|
| Population Estimate (2021 Census) | 10,788 | 329,993 | Census 2021 |
| Children aged 0-15 | 1,836 | 68,116 | |
| Working-age people (16-64) | 7,543 | 216,855 | |
| Older people aged 65+ | 1,409 | 45,015 | |
| % All Children aged 0-15 | 17.0 | 20.6 | |
| % All Working-age (16-64) | 69.9 | 65.7 | |
| % All Older people aged 65+ | 13.1 | 13.6 | |
| % Not Born in UK - 2021 | 55.9 | 40.4 | |
| % English is First Language of no one in household - 2021 | 22.6 | 13.4 | |
| Area - Square Kilometres | 1.3 | 82.2 | Local Government Boundary Commission |
| Population density (people per sq km) | 8,298 | 4,014 | Census 2021 / Boundary Commission |

Relative Deprivation

It can be seen below that Bowes ward shares the relatively high levels of deprivation found across the south and east of the borough. While no neighbourhoods therein are within the top 50% least deprived areas across England, nor are any among the most severely deprived neighbourhoods, as can be seen around Edmonton, Enfield Lock, etc.



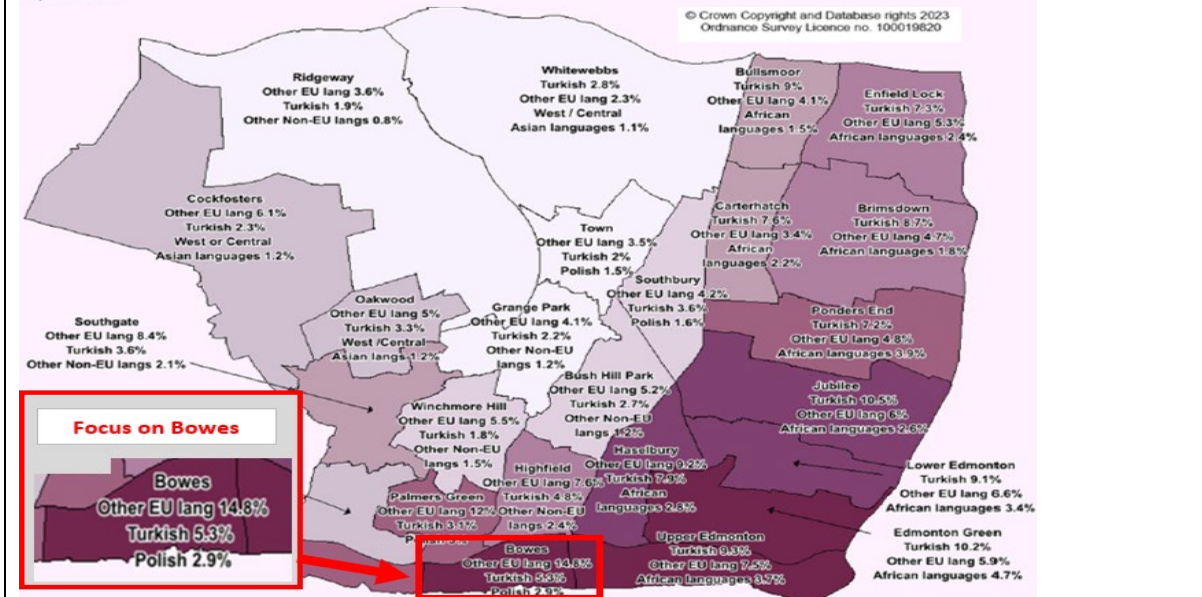
Languages

Most commonly-spoken languages by ward

2021 Census data reveals that English is the most widely spoken main or only language in every ward in the borough, however 23% of Enfield's residents have a main language other than English.

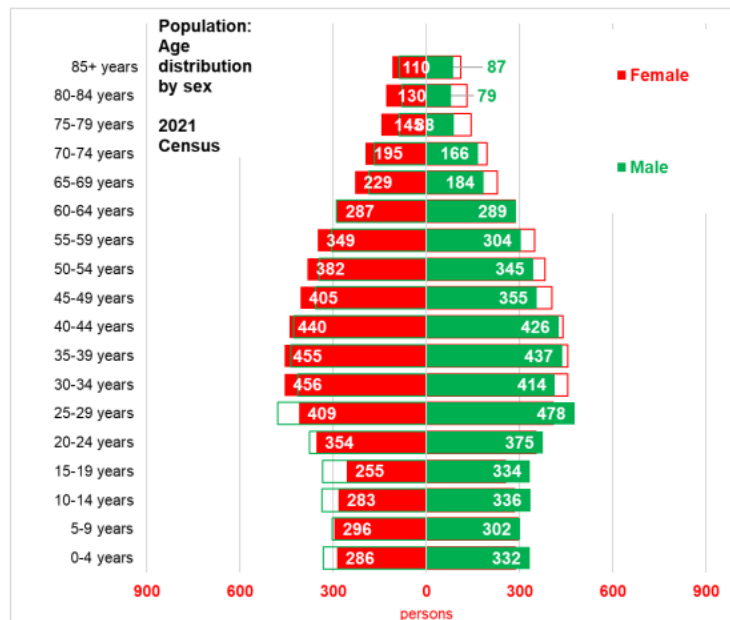
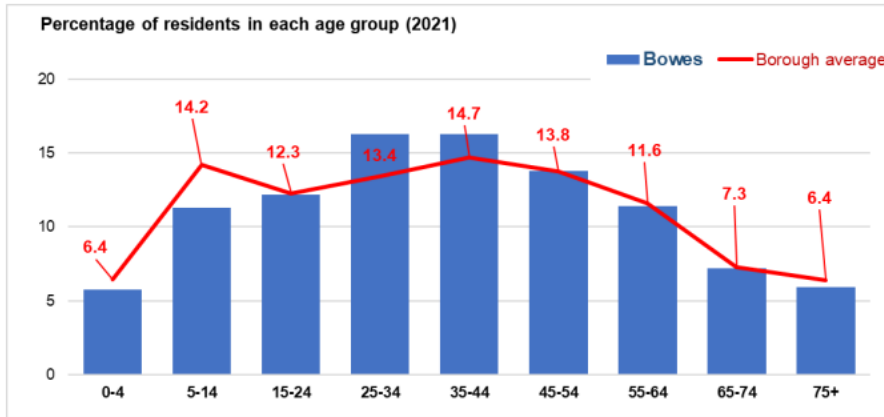
The map below shows the second, third and fourth most commonly spoken languages in each ward, plus the percentage of residents (aged 3 and over) who speak them as a main or only language.

The darker shaded areas show those wards with the highest overall percentages of non-English speakers.



Age and Gender

The ward has relatively high numbers of working age adults when compared to the borough average, and proportionately fewer children. Women outnumber men in all age bands over 30 years of age (see table bottom).



Section 3 – Equality analysis

Age

This can refer to people of a specific age e.g. 18-year olds, or age range e.g. 0-18 year olds.

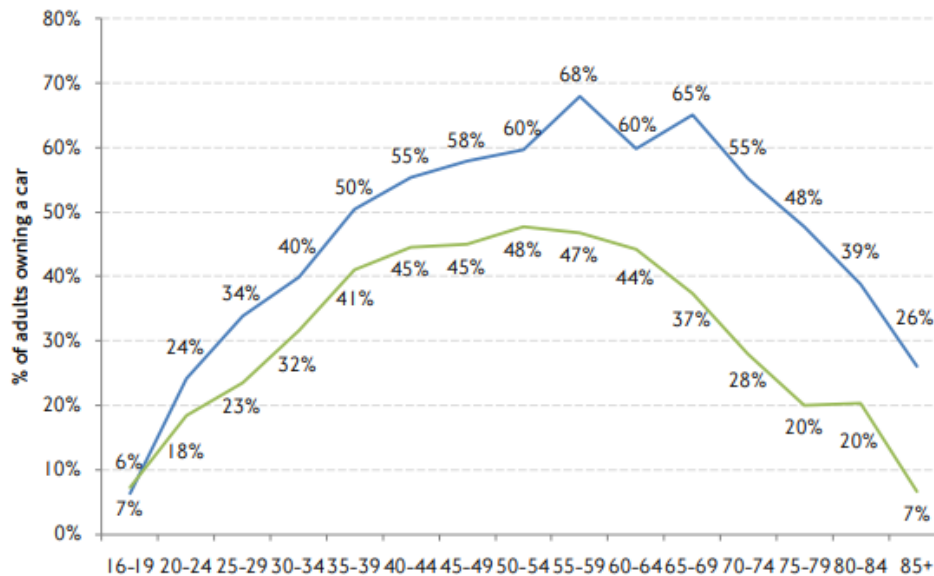
Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people of a specific age or age group (e.g. older or younger people)?

Please provide evidence to explain why this group may be particularly affected.

Overview of Considerations Around Age

Broadly, car ownership levels in London increase with age up to around 50-60 years old and then decline beyond that.² However, the proposed zone will affect all car users living in these zones equally, regardless of their age. It can be seen above that Bowes ward has slightly fewer older people than the borough average.

Figure 1: Car ownership in London by age and gender



Nationally, we know that there has been a large increase in the number of older people in England holding a full driving licence. Between 1995/1997 and 2020 the proportion of people aged 70+ holding a licence increased from 39% to 77%. Some people of pensionable age will have a fixed or lower income and could potentially be disproportionately impacted by a new parking zone.

(1) Correlation Between Older Age and Disability

Any blue badge holder resident within a zone is entitled to apply for a free annual permit, which should prevent any degree of age/disability correlation translating through into a disproportionate drawback for older people. This aspect is addressed further in the ‘Disability’ section that follows.

(2) Affordability of Permits for Older Residents

For the sake of consistency and fairness, zonal permit prices are standardised across all 20 of Enfield’s cross-the-week resident parking zones. Prices are halved for short hour zones, relative to all day zones, hence the relatively short

² <https://content.tfl.gov.uk/technical-note-12-how-many-cars-are-there-in-london.pdf>

duration of the favoured controlled period is accounted for in the pricing. There is no discounting on permit prices based on age.

| Resident permits - 1-to-4 hour zones | | |
|---------------------------------------|--------------|-------------------------|
| Engine size | First permit | Second and third permit |
| 1000cc or less, and electric vehicles | £38.50 | £47.50 |
| 1001cc to 1600cc | £77.50 | £97.50 |
| 1601cc to 1999cc | £115 | £145 |
| 2000cc or more | £197.50 | £249 |

The ascending price based on engine size reflects the tendency for vehicles with larger engines to occupy more space and to pollute more. The roughly 25% surcharge on second or third permits is to provide some limiting factor on excessive car ownership within the zone. The revised pricing regime was decided by a recent Council decision on the matter, effective January 2023, and was subject to the normal approval and scrutiny procedures. The uplift for 2nd/3rd permits is applied by vehicle owner, not by household. Two adults in a household with a car registered to them each would both pay the first permit rate.

It is typical across London that residents are asked to pay for permits for such schemes to match the cost of scheme administration and additional enforcement activity. Government advice directs councils to ensure their parking control accounts are self-financing. Permit prices are therefore set, borough wide, with the aim of breaking even. It is appropriate to ask those who benefit most from the intervention – car owners - to help pay for it, thus making any such scheme a viable proposition.

The following points address the concern that the introduction of permit prices will unduly affect older people, due to some having less spare money than those in working age households:

a) The Costs are Modest or Else Avoidable

The annual permit price for a small hatchback in Bowes East CPZ will be £77.50, which equates to just £1.50 per week. This is dwarfed by many other weekly transport costs people typically incur like oyster fares or fuelling their cars. Those drivers who continue running a car beyond working age have fewer reasons than younger people to have particular need of a larger car (for transporting multiple young children or work equipment or family holidays) or of needing more than one car per household, hence the higher bracket costs should either be a factor they can avoid, or can afford anyway, along with the other additional costs of running a larger car or multiple cars.

b) Car Owners of Any Age are Unlikely to be Amongst the Poorest Residents

Ongoing costs associated with keeping and running a car (setting aside the cost to purchase one) can easily reach £1000 per year, when considering vehicle tax, insurance, MOT and maintenance, sundry parking fees, and the cost of fuel. We

see above that one third of households do not own a car. Hence it is reasonable to conclude that the poorest households in the zone, for whom small additional costs might be unaffordable, will not be liable to incur those costs under the scheme due to not owning cars in the first place, regardless of age.

c) Good Alternative Travel Options for Older People

Furthermore, as an affordable alternative to car ownership for residents, older people of pensionable age are eligible for free travel across London and free local bus journeys nationally. The neighbourhood is well served by train stations and bus services, with city-bound buses leaving stops on the adjacent section of Green Lanes at a rate of one bus every three minutes. Few older people who can afford to forgo free travel in favour of running a private car would, logically, fall within the poorest group who are unable to afford the modest annual permit prices. The Council has also put in place ‘brown badge’ bays in certain car parks to assist older (70+) residents that don’t qualify for a blue badge.

d) Experience from Other Zones

It can be seen in the mapping above that existing parking zones in Enfield cover areas of higher deprivation than Bowes. And yet the Council continues to receive very little correspondence from the community – if any at all – seeking to have zonal parking controls removed due to issues of affordability for older people. (Or on any other grounds, in fact.) The obvious conclusion is that, when controls are in place, residents do not find permit prices unaffordable. Similarly, in 2019 what can be thought of as the twin of this scheme – called Bowes Park CPZ – was introduced to the similar set of streets west of Green Lanes. Again, despite the trial period, in that example, affording residents a specific opportunity to call for the controls to be removed, no such requests arose. Moreover, it can be seen that the extensive urban area south of the borough boundary in Haringey, again including areas of similar deprivation levels and street layout and housing density to Bowes East, is already covered with zonal parking controls. Officers are aware of no indications that this brings issues around affordability.

e) Further Options in Exceptional Cases

In light of the four points above, the risk is low that the introduction of permit prices will present a disproportionate issue for older people around the affordability of resident permits. But in the exceptional cases, of a person of any age needing a car but finding the permit cost difficult to afford, the following points of mitigation exist:

- The controlled hours only operate between 11am-1pm Monday to Friday, enabling some to avoid the need to purchase a permit if they are not at home during these hours;
- On-street parking is still available outside the zone, a relatively short walk away, for those electing to not buy a permit.

(3) Visitor Permit Requirement Having Isolating Effect on Older People

The idea that vulnerable residents in the area would be hindered from receiving visitors was amongst the points of objection submitted. The issue is herein

considered with respect to – what might be imagined - its disproportionate applicability to older people.

Provision exists for those employed as carers who make visits to the neighbourhood to apply for an annual ‘essential permit’, at a cost of £25. Permit applications by those offering regular care visits on a ‘friends and family’ basis will also be accepted; the standard annual permit charges, which are only modest, apply to these applicants. Drivers, whatever the reason for their visit, who display a valid blue badge will not attract enforcement activity for parking in any of Enfield’s resident-permit holder bays. The scheme should not, therefore, bring hindrance to the routine care and care-themed visiting activity associated with the most vulnerable, regardless of age.

It should be further considered whether an isolating effect is likely to manifest itself, applying disproportionately to older people, around visiting activity more generally.

Visitor permits are available to all households within the zones. These cost £10.50 for a book of 10 and there is no restriction on the number of visitor permits that can be obtained. An older person with no car on a fixed income might find the visitor permits somewhat unaffordable. But the person who can afford a car who will be making use of the permits should not find it unaffordable to reimburse the person they are coming to visit. In addition, under the future arrangements, visitors are likely to find vacant kerbsides easier to find when they arrive, providing some offset to the modest cost deterrent that is imposed.

None of the controls prohibit a driver stopping briefly to pick up or set down a passenger – where they plan to go out together for lunch, say - so visitor permits should not be required for such activity. Visitors who did not want to make use of visitor permits still have the option of visiting by car at weekends, or outside of the 11am to 1pm controlled period on weekdays, or by visiting without their car by active travel options or taking advantage of the excellent public transport options serving the location. Altogether, there are many reasonable options for visitors to exhaust before deciding the visit is no longer worth making.

Anxieties around permit controls cutting off visitors to vulnerable or older residents was a prominent concern raised at the same stage when the aforementioned Bowes Park CPZ was being taken forward. It is suspected that parties inclined to object to such schemes will often invoke a point of opposition they feel offers greatest emotional resonance to add flavour to a primary point of opposition that is more prosaic, such as disliking the principle of paying to park on their street. The reason this is suspected is because, as set out above at Bowes Park, the topic never resurfaced in communications with the Council once the scheme was implemented.

The one third of households in the borough who do not own a car will include people who make visits to vulnerable friends and relatives. For such people the experience of making journeys without the facility to travel by car and park for free immediately outside the destination will be routine. Hence a minor cost or limitation on when such

visits occur by those who are fortunate enough to own cars should not, logically, be a definitive obstacle to the visits continuing.

Mitigating actions to be taken

None. The provisions set out above, which apply to all such parking zones in Enfield, offer suitable mitigation to the factors identified.

Disability

A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on the person’s ability to carry out normal day-day activities.

This could include: physical impairment, hearing impairment, visual impairment, learning difficulties, long-standing illness or health condition, mental illness, substance abuse or other impairments.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people with disabilities?

Please provide evidence to explain why this group may be particularly affected.

Relevant Data

At the 2021 Census, 44,900 Enfield residents (13.6% of the total) reported having a disability, with 7.2% of people have their day-to-day activities limited a little; 6.4% have them limited a lot.

Data on disability among the working age population estimated that in the year ending December 2020, 52,700 (nearly 25%) Enfield residents aged 16-64 were estimated to have a disability, higher than London (17.9%) and England (22.4%).³ In terms of our population of children and young people, Enfield currently maintains Education, Health and Care Plans for 3.5% of 0–25-year-olds in Enfield, and around 10.6% of school age children and young people receive Special Educational Needs (SEN) Support at school.

Impacts on Blue Badge Holders

There are currently 11,588 blue badge holders in Enfield. Disabled residents living in Bowes East CPZ with a Blue Badge will not be impacted, as they will be entitled to a free resident’s permit. Disabled people who are blue badge holders living outside the CPZ will also be able to park for free in designated bays in the CPZ while displaying their blue badge.

³ Enfield Council, [Borough Profile](#), 2021

Care and Care-Themed Visits to Vulnerable Residents

Provision exists for those employed as carers who make visits to the neighbourhood to apply for an annual 'essential permit', at a cost of £25. Permit applications by those offering regular care visits on a 'friends and family' basis will also be accepted; the standard annual permit charges, which are only modest, apply to these applicants. The scheme, should not therefore, bring hindrance to the routine care and care-themed visiting activity associated with the most vulnerable. But it may improve the likelihood of visitors finding parking spaces in good proximity to the address being visited, by the deletion of all day commuter parking activity and such like.

The section above on 'Age' covers points relating to impacts on those who are more vulnerable than average, without being registered disabled.

Visitors to Upsdell Avenue Dental Surgery

An objection was received from the sole business operating within the proposed zone boundary, the dental surgery on Upsdell Avenue, asserting that zonal parking controls would hinder visits by less able patients. Being a non-domestic premises, the surgery would not be eligible to buy and distribute visitor permits to its patients.

In terms of visitor parking, officers noted that the surgery features one off-street parking space that could be allocated to less able customers when appointments are issued. In light of the concerns around less able visitors, the design was amended to include two disabled bays immediately adjacent to the premises, as seen on the plan included above.

Seeing that the premises are modest in size and that the practice's website refers to 3 surgeries running therefrom, officers felt that parking provision accommodating, potentially, three blue badge holder vehicles at once (whether driven by the patient or the person bringing them) would fully mitigate the concern that vulnerable patients would be denied access to dental services and would, in fact, represent relatively good levels of parking provision for less able visitors.

Further mitigation around the ease with which vulnerable patients can visit the surgery, before and after a parking zone is in place, is offered by the following points:

- (i) The controlled period only applies at 11am to 1pm on weekdays, hence the surgery could steer patients who did not have blue badges but still felt they could only travel by car to visit outside those times when issuing appointments.
- (ii) At all other times, any driver can park in the permit holder bays and the overall effect of the scheme should be that more positions are found vacant than they were in the years before. Under the present scenario - with unrestricted usage of kerbsides by commuters, Haringey residents, customers and staff of main road stores, and so forth – the number of nearby on-street spaces the surgery can reliably tell visitors, blue badge holders or otherwise, they will find vacant upon arrival is zero. And off-street spaces, only one.

- (iii) A driver displaying a blue badge can park in any of Enfield's permit holder bays without fear of receiving a ticket, should the two disabled bays happen to be occupied.
- (iv) In the case of patients being driven to the surgery who are not blue badge holders, none of the new controls prohibit setting down of passengers, but they are quite likely to leave more gaps at the kerbside for such activity to take place with greater ease.

Mitigating actions to be taken

None. The general provisions set out above, which apply to all such parking zones in Enfield, offer suitable mitigation to the factors identified.

The addition of the two disabled bays offers suitable mitigation to the impacts on less able patients seeking to attend dental appointments at the practice on Upsdell Avenue.

Gender Reassignment

This refers to people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on transgender people?

Please provide evidence to explain why this group may be particularly affected.

No adverse impacts are identified applying to this category.

Mitigating actions to be taken

N/A

Marriage and Civil Partnership

Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, where-as a marriage can be conducted through either religious or civil ceremonies. In the U.K both marriages and civil partnerships can be same sex or mixed sex. Civil partners must be treated the same as married couples on a wide range of legal matters.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people in a marriage or civil partnership?

Please provide evidence to explain why this group may be particularly affected.

| |
|--|
| No adverse impacts are identified applying to this category. |
| Mitigating actions to be taken |
| N/A |

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|--|
| Pregnancy and maternity |
| Pregnancy refers to the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding. |
| Will this change to service/policy/budget have a differential impact [positive or negative] on pregnancy and maternity? |
| Please provide evidence to explain why this group may be particularly affected. |
| No adverse impacts are identified applying to this category. |
| Mitigating actions to be taken |
| N/A |

| |
|---|
| Race |
| This refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins. |
| Will this change to service/policy/budget have a differential impact [positive or negative] on people of a certain race? |
| Please provide evidence to explain why this group may be particularly affected. |
| The proposals to introduce the scheme will affect all car users living in the zone, regardless of their race, ethnicity and so forth. The measures are not identified to affect residents of the zone differently based on these characteristics, hence concerns around equality should not apply. |
| By way of context, based on the 2021 Census, residents from White British backgrounds make up 31.3% of Enfield's inhabitants with other White groups (including White Irish) combined at 28.7%. Mixed Ethnic Groups account for 5.9%, Asian Groups for 11.5% and Black groups for 18.5% of Enfield's population. ⁴ |

⁴<https://enfield365.sharepoint.com/sites/Intranetchiefexec/SiteAssets/Forms/AllItems.aspx?id=%2Fsites%2FIntranetchiefexec%2FSiteAssets%2FSitePages%2FPopulation%2D%26%2DDemography%2F2021%2DCensus%2D>

Specifically in the Bowes area, it can be seen that it has relatively high levels of residents who speak languages other than (or in addition to) English. It also has percentages above the Enfield average, of homes with no English as a first language and of people born outside the UK, which might correlate to a greater make up of minority ethnic groups.

The Council's position on parking zones, in summary, is that they offer benefits and to a lesser extent drawbacks (notably permit costs) to residents within the zone but especially to car owners. Zones have, to date, been placed at various locations across the borough (typically around train stations and town centres) in an organic fashion, but giving a coverage that is not notably slanted to areas of high or low deprivation, nor high or low levels of racial diversity. And it intends to pursue further coverage proactively, based on the four criteria mentioned above, again, with no particular regard to levels of deprivation or diversity.

It follows that, if the measure is not identified to affect residents differently along racial lines, then the racial make-up of the area in question should not prompt concerns around equality given that proposals have and will, going forward, apply to wards across the full local spectrum in terms of racial diversity. Rather, it is the factor of owning a car, or not owning a car, that defines to what extent the benefits and drawbacks apply.

The cross London car ownership data seen above indicates that those of white ethnic origin have the greatest proclivity for car ownership. Hence, when considering the drawback of permit charges across all such parking zone proposals, there is no concern of such a scheme having a disproportionate negative impact on minority ethnic groups.

One difference that can be drawn along ethnic lines is that minority ethnic groups in the UK have greater proportions of multigenerational households compared with the white ethnic group. Which may mean that they are more likely to have multiple cars at one property.⁵ However, this difference should not translate to a particular disadvantage due to the following factors. Firstly, with car owners unlikely to be amongst the poorest group of people in the neighbourhood, each car owner should be able to absorb and/or minimise the additional modest cost of a permit, where needing one, irrespective of whether living in a multi-generational household or otherwise. Secondly, the uplift in permit prices for 2nd/3rd vehicles is applied by individual owner to whom the vehicles are registered, not by household. Hence several household members could purchase permits for their vehicle and all pay at the lower tariff. Only where one household member happens to have multiple vehicles registered in their name, and need permits for them, does the uplift come into play.

%2D%2DEnfield%2DHeadline%2DReport%2Epdf&parent=%2Fsites%2FIntranetchiefexec%2FSiteAssets%2FSitePages%2FPopulation%2D%26%2DDemography

⁵<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/families/adhocs/12005/householdsbyagecompositionandethnicityuk2018>

A final consideration, on the topic of language, is around how well those without English as a first language can engage in the consultation and decision-making process. The Council attempted to mitigate for this disadvantage, at the informal consultation stages, by the following:

- Undertaking more than one consultation exercise
- Making options available to submit comments (and ask questions) by phone and on paper proformas that could be submitted via officers or their ward councillors, in addition to making digital submissions
- Including within its leaflets drawings and images that would make obvious the nature of the proposal, even if the recipient needed to seek help in understanding the meaning of the accompanying text

Moreover, the proposal has greatest impact on drivers. Residents who drive should, logically, be those who have sufficient familiarity with English to understand printed information of this type, given that they must also have the capacity to read road signs, pass driving tests, and conduct the necessary administration to keep a vehicle on the roads of the UK.

For those reasons, the hindrance around engaging with the proposals around language is duly mitigated.

Mitigating actions to be taken

No adverse impacts are identified applying to this category.

Consultation stage mitigation measures around how proposals were communicated to those who may not have English as a first language are set out above.

Religion and belief

Religion refers to a person's faith (e.g. Buddhism, Islam, Christianity, Judaism, Sikhism, Hinduism). Belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who follow a religion or belief, including lack of belief?

Please provide evidence to explain why this group may be particularly affected.

No adverse impacts are identified applying to this category.

Mitigating actions to be taken

N/A.

Sex

Sex refers to whether you are a female or male.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on females or males?

Please provide evidence to explain why this group may be particularly affected.

According to the Census 2021, in Enfield 52.3% of residents identify as female and 47.7% as male. This is very similar to the percentage split for London as a whole (49 per cent male, 51 per cent female). On average, in London, 46% of men and 34% of women have access to a car.⁶

The measures will affect all car users living in these zones, regardless of their sex. The measures are not identified to affect residents of the zone differently based on these characteristics.

Mitigating actions to be taken

No adverse impacts are identified applying to this category.

⁶ <https://content.tfl.gov.uk/technical-note-12-how-many-cars-are-there-in-london.pdf>

Sexual Orientation

This refers to whether a person is sexually attracted to people of the same sex or a different sex to themselves. Please consider the impact on people who identify as heterosexual, bisexual, gay, lesbian, non-binary or asexual.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people with a particular sexual orientation?

Please provide evidence to explain why this group may be particularly affected.

The measures will affect all car users living in these zones, regardless of their sexual orientation. The measures are not identified to affect residents of the zone differently based on these characteristics.

Mitigating actions to be taken

N/A

Socio-economic deprivation

This refers to people who are disadvantaged due to socio-economic factors e.g. unemployment, low income, low academic qualifications or living in a deprived area, social housing or unstable housing.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who are socio-economically disadvantaged?

Please provide evidence to explain why this group may be particularly affected.

For context, Enfield's IMD ranking compared with the 316 other local authorities in England dropped from 2015 to 2019: Enfield is now the 74th most deprived local authority in England overall, so still within the most deprived 25% of all districts. Enfield's average deprivation score has not worsened. However, Enfield has become relatively more deprived when compared with other London boroughs. In 2015, Enfield was the 12th most deprived borough in London, whereas in 2019 it was the 9th most deprived.

It can be seen in the images above that Bowes ward is relatively deprived compared to the borough average, but less deprived than other areas covered by parking zones.

This proposal will affect all car users living in the zones, with a key drawback being permit prices. There follows a discussion on whether this amounts to a disproportionate impact on those who are socio-economically disadvantaged.

a) The Costs are Modest or Else Avoidable

The annual permit price for a small hatchback in Bowes East CPZ will be £77.50, which equates to just £1.50 per week. This is dwarfed by many other weekly transport costs people typically incur like oyster fares or fuelling their cars.

b) Car Owners are Unlikely to be Amongst the Poorest Residents

Ongoing costs associated with keeping and running a car (setting aside the cost to purchase one) can easily reach £1000 per year, when considering vehicle tax, insurance, MOT and maintenance, sundry parking fees, and the cost of fuel. We see above that one third of households do not own a car. Hence it is reasonable to conclude that the poorest households in the zone, for whom small additional costs might be unaffordable, will not be liable to incur those costs under the scheme due to not owning cars in the first place.

Nationally, we know that car ownership in England depends heavily on household income. According to the Department for Transport's 2019 National Travel Survey, 45% of households in the lowest real income level quintile do not own a car or van compared with 14% of households in the highest real income level quintile.⁷

c) Good Alternative Travel Options

Affordable travel options for older people are set out above. Furthermore, according to research undertaken by Transport for London, the most commonly used form of transport for Londoners with lower household incomes (below £20,000) is walking. The bus is the next most used form of transport with 69% of people with lower household incomes taking the bus at least once a week compared to 59% of all Londoners. In addition, 42% of Londoners with a household income of less than £20,000 have household access to a car compared with 65% of Londoners overall, declining to 27% of Londoners in the lowest household income bracket (less than £5,000).⁸

Most of the borough provides a good level of public transport accessibility, providing a cost-effective alternative to car ownership. In addition, the Council is investing in improving cycle facilities across the borough, providing a healthy and cheap means of active travel. This will help some residents to travel without the need to use a car.

d) Experience from Other Zones

It can be seen in the mapping above that existing parking zones in Enfield cover areas of higher deprivation than Bowes. And yet the Council continues to receive very little correspondence from the community – if any at all – seeking to have zonal parking controls removed due to issues of affordability for older people. (Or on any other grounds, in fact.) The obvious conclusion is that, when controls are in place, residents do not find permit prices unaffordable. Similarly, in 2019 what can be thought of as the twin of this scheme – called Bowes Park CPZ – was introduced to the similar set of streets west of Green Lanes. Again, despite the trial

⁷ Department for Transport, [National Travel Survey](#), 2019

⁸ Transport for London, [Travel in London: Understanding our diverse communities](#), 2019

period, in that example, affording residents a specific opportunity to call for the controls to be removed, no such requests arose. Moreover, it can be seen that the extensive urban area south of the borough boundary in Haringey, again including areas of similar deprivation levels and street layout and housing density to Bowes East, is already covered with zonal parking controls. Officers are aware of no indications that this brings issues around affordability.

e) Further Options in Exceptional Cases

In light of the four points above, the risk is low that the introduction of permit prices will present a disproportionate issue for the most deprived households. Further mitigation includes:

- The controlled hours only operate between 11am-1pm Monday to Friday, enabling some to avoid the need to purchase a permit if they are not at home during these hours;
- On-street parking is still available outside the zone, a relatively shorty walk away, for those electing to not buy a permit.

Mitigating actions to be taken.

The Council will continue to invest in active travel measures to provide a cost-effective alternative to car ownership. The Council will also continue to work with Transport for London to improve bus services across the borough, but in areas of low car ownership in particular.

Section 4 – Monitoring and review

How do you intend to monitor and review the effects of this proposal?

Who will be responsible for assessing the effects of this proposal?

Obtain additional information about uptake of permits by people with different protected characteristics to enable better assessment of impacts in future.

Section 5 – Action plan for mitigating actions

Any actions that are already completed should be captured in the equality analysis section above. Any actions that will be implemented once the decision has been made should be captured here.

| Identified Issue | Action Required | Lead officer | Timescale/By When | Costs | Review Date/Comments |
|---|--|--------------|-------------------|-------|----------------------|
| Data on characteristics of permit holders not currently held. | Review options for obtaining better information about characteristics of permit holders. | David Morris | October 2023 | TBC | |