

**Camden Council
Equality Impact
Assessment -
Parking Policy
Review (Healthy
Streets, Healthy
Travel: Cleaner,
Fairer Parking)**

Title of the activity	
Parking Policy Review (Healthy Streets, Healthy Travel: Cleaner, fairer parking)	
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Directorate:	
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Version number and date of update	
<i>Version 2 - 02 February 2024</i>	

1.a Is it a new activity or one that is under review or being changed?

- New
- Under review
- Being changed

1.b. Which groups are affected by this activity?

- Staff
- Residents
- Contractors
- Other (please detail): Camden businesses and visitors

1.c Which Directorate does the activity fall under:

- Supporting People
- Supporting Communities
- Corporate Services
- More than one Directorate. Please specify:

1.d Outline the aims/objectives/scope of the activity.

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In 2019, Camden Council published the Camden Transport Strategy (CTS), which presents a vision to transform transport and mobility in the Borough and enable and encourage people to travel sustainably. The CTS commits the Council to delivering policies and programmes that help meet ambitious targets around reducing motor vehicle traffic volumes and increasing sustainable transport mode share. As road vehicles are the main source of air pollution in the borough, contributing 47% of NO₂ emissions and 26% of PM_{2.5} to overall emissions¹, the Council's Clean Air Action Plan (CAAP) includes a commitment to reduce emissions from vehicles on Camden's roads by reviewing and improving parking policy. Similarly, as road transport accounts for 13% of the Borough's CO₂ emissions, the Camden Climate Action Plan commits to regularly reviewing and amending parking permits and prices to reflect the climate emergency and as a means to achieve a zero carbon Camden by 2030.

Motor vehicle dominance not only contributes to poor air quality and harmful emissions, it also impacts road safety and road space distribution. Only 35% of Camden households own a car/van¹, yet 59% of kerbside space in the borough is dedicated to parking. It is the council's ambition to transform how we use these spaces and make them accessible to all residents, businesses and visitors in the borough.

The CTS and CAP recognise the value of using reviews and amendments to parking permits and prices to contribute towards addressing the climate emergency, to encourage people to change the way they travel around the borough, specifically to use less polluting vehicles or more sustainable travel options such as public transport, walking or cycling.

The proposed permit and parking charges have been set very carefully, to both encourage people to purchase less polluting vehicles, to travel by other more sustainable modes, and consider the socio-economic and protected characteristics of our residents and communities.

The parking fees and charges form part of the Council's efforts to minimise vehicle ownership and use, improve air quality, reduce harmful emissions, and improve road safety throughout the whole borough. Changes to parking fees and charges also aim to encourage more sustainable forms of travel such as walking, cycling or using public transport as well as increase levels of physical activity to improve the health and well-being of Camden's residents, and visitors to the Borough. We have gathered extensive data on why it is important to facilitate these changes, which includes:

- Higher car ownership is associated with lower levels of physical activity².
- In Camden, many journeys taken by car are short and it is likely that many could easily be walked or cycled - 70% of residents' car trips are under 5km, with 40% under 2km.³
- Currently, road transport is responsible for 13% of Carbon Dioxide (CO₂) emissions in Camden.
- In terms of air pollution, road transport is responsible for 31% of harmful particles of Nitrogen Oxides (NO_x), 16% of PM₁₀ and 20% of PM_{2.5} emissions in the borough⁴.
- Studies show that noise from transport is associated with annoyance, stress, sleep disturbance, and impaired cognitive performance, leading to increased incidences of

¹ Office for National Statistics. (2021) [2021 Census Topic Summary Housing](#).

² Transport for London. (2016) [Travel in London Report 9](#).

³ Camden, (2019). [Healthy Streets, Healthy Travel, Healthy Lives: Camden Transport Strategy 2019-2041](#)

⁴ Camden. (2019). [Healthy Streets, Healthy Travel, Healthy Lives: Camden Transport Strategy 2019-2041](#)

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arterial hypertension, the development of cardiovascular disease, the risk of coronary artery disease and stroke⁵.

- Evidence shows that people who walk and cycle more are less likely to own a car. This suggests that the car owning population is disproportionately impacting on non-vehicle owners⁶.

An extensive Evidence Base underpinning the objectives, measures and policies in the Camden Transport Strategy, which includes proposals to review and amend parking fees and charges/terms and conditions, has also been completed and can be found [here](#).

To achieve the aims described above, the parking fees and charges review proposes to increase parking fees and charges, introduce emission-based charging to additional permit types, change terms and conditions of some of the parking products and limit the number of vehicles allowed on a single Resident and Business permit.

The parking fees and charges review would, if approved, help support and accelerate the delivery of the council's key policies and strategies included in:

- [Camden Transport Strategy \(2019-2041\)](#)
- [Camden Clean Air Strategy 2019-2034 and Clean Air Action Plan 2023-2026](#)
- [Camden Climate Action Plan 2020-25](#)
- [We Make Camden](#)
- [Camden Joint Health and Wellbeing Strategy 2021-2030](#)

Prioritising the mode shift to more sustainable forms of travel would help enable more people to benefit from physical activity and greater efficiency on the network and kerb space, so that those who need to use private motor vehicles, such as those with a disability and pregnancy and maternity groups, can do so with greater ease. Encouraging a shift towards walking and cycling would also help to reduce overcrowding on public transport so that those who most rely on it, such as elderly people and those with a disability, can use it comfortably and efficiently.

Step 2: Data and evidence

2.a Consider any relevant data and evidence in relation to all Equality Act protected characteristics:

- Age
- Disability, including family carers²
- Gender reassignment³
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief

⁵ Münzel, T., Schmidt, F. P., Steven, S., Herzog, J., Daiber, A., & Sørensen, M. (2018). Environmental Noise and the Cardiovascular System. *Journal of the American College of Cardiology*, 71(6), 688–697. <https://doi.org/10.1016/j.jacc.2017.12.015>

⁶ Camden. (2019) [Appendix G Camden Transport Strategy Evidence Base Report](#).

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Sex

Sexual orientation

2 This is the legal term in the Equality Act. In practice there are specific legal protections for a diverse range of people who have physical, mental and sensory impairments, long-term health conditions and/or neurodivergence, as well as carers who provide unpaid care for a friend or family member who cannot function without their support. Census and local datasets use the Equality Act definition and will include people who may not use the language of disability to describe themselves.

3 This is the legal term in the Equality Act. In practice there are specific legal protections for anyone whose gender identity does not match the sex they were assigned at birth. This means, for example, that people who are trans and people who are non-binary or gender fluid are considered a specific protected group under the Equality Act.

Age

Camden has a resident population of approximately 210,100 (2021)⁷. The estimates of population are currently in a period of flux as the population base changes from 2011 to 2021, while the intervening years (2012-2020) have to be reassessed to line up with the newly realised mid-year population estimate for 2021. ONS are currently re-evaluating their estimates accordingly: the main components of population change are births and deaths (pretty reliable from the registration system), but the real difficulty is to understand and estimate for the intricacies of domestic and international migration over the period, particularly difficult post Brexit and taking account of the COVID-19 pandemic.

Almost half of Camden's population (Census 2021) is made up of people aged 25-49 and 72.8% are classified as working age (16-64). There is a smaller percentage of all other age groups with 16.2% of the population made up of those aged 50-64 and 11.6% made up of those aged 19-24. Camden has a smaller percentage of people aged over 65 at 11.0% with the younger population (people under 18) making up a higher percentage of 17.3%. Predictions are that people over 65 will make up a larger proportion of Camden's population in the future, so we need to future proof the borough to meet the needs of people over 65, but also ensure that they remain in good health and enjoy independent mobility as they age.

The health of the young and the old are impacted disproportionately from the effects of poor air quality levels as well as fear of road danger and traffic which can result in isolation and exclusion. Poor air quality, including high levels of PM2.5 and NO2, is linked to an increased risk of dementia among people aged 50-79⁸ while increased exposure to air pollution in older people has been associated with higher mortality rates due to cardio-pulmonary or respiratory causes.⁹ Poor air quality is also linked to higher risk of asthma (and reduced lung volume and capacity) and impaired cognitive development in children.^{10 11} Children are also disproportionately exposed

⁷ London Borough of Camden. (2023) [Demographic Databook](#)

⁸ Carey IM, Anderson HR, Atkinson RW, et al. (2018) Are noise and air pollution related to the incidence of dementia? A cohort study in London, England *BMJ Open* 2018;8:e022404. doi: 10.1136/bmjopen-2018-022404

⁹ Simoni, Baldacci, Maio, Cerrai, Sarno and Viegi., (2015). Adverse effects of outdoor pollution in the elderly. *Journal of Thoracic Disease*. 7(1): 34–45.

¹⁰ Kravitz-Wirtz, Nicole, Samantha Teixeira, Anjum Hajat, Bongki Woo, Kyle Crowder, and David Takeuchi. (2018) Early-Life Air Pollution Exposure, Neighborhood Poverty, and Childhood Asthma in the United States, 1990–2014. *International Journal of Environmental Research and Public Health* 15, no. 6: 1114. <https://doi.org/10.3390/ijerph15061114>

¹¹ Sunyer J, Esnaola M, Alvarez-Pedrerol M, Fornes J, Rivas I, López-Vicente M, et al. (2015) Association between

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to high pollution levels on the way to school and during the school day.¹² Inactivity is also a concern: these age groups are the least active. In Camden, only one in eight 15-year-olds meet the level of weekly physical activity recommended by the UK Government's Chief Medical Officer.¹³ Data from UK GOV reported that 43% of adults aged 40 to 60 years old walk less than 10 minutes continuously each month at a brisk pace. This was a higher percentage than in all other regions of England, except in West Midlands which was the same¹⁴. More active lifestyles would improve health among these groups, reducing health inequalities.

Young and older people are also disproportionately affected by the negative impacts of climate change, such as extreme heat and cold, increased air pollution, flooding, and food insecurity. Young people in particular have been shown to experience eco-distress related to climate change¹⁵ while older adults have been shown to experience disproportionate negative health impacts and to be more likely to die because of extreme weather, heatwaves, wildfires and hurricanes.¹⁶ Transport emissions, which the scheme would help to reduce, are key contributors to these climate change impacts.

Just over 30% of children's journeys are made by car (as a passenger), however a bigger proportion (40%) are made on foot or by bike and a further 27% on public transport. The group who drives most are those aged 49 to 59, with 40% of their journeys driven. 40% of trips taken by people over the age of 65 are also driven, either as a driver or a passenger. However, across all age groups, the majority of journeys are not made by private car. This data is for the whole of London as we do not have Camden specific data by age. As car ownership in the borough, and in Central and Inner London is much lower than outer London, and public transport availability is much higher, these figures are likely to overestimate actual vehicle use in Camden.

In Inner London, public transport and walking are by far the most used modes of travel. In 2023, the proportion of Camden residents' trips that were walked, cycled or used public transport was 85%. More specifically, 44% of trips were made by walking, 5% by cycling and 36% by public transport.¹⁷ Data also shows that 70% of Camden's driven trips are under 5km, with 40% under 2km (Travel in London Report 10, 2018). TfL's Walking Potential and Cycling Potential reports also show that a significant proportion of driven trips in Camden could be switched to walking or cycling based on a range of factors including age, journey distance, journey purpose, and whether they are carrying loads.

Traffic-Related Air Pollution in Schools and Cognitive Development in Primary School Children: A Prospective Cohort Study. PLoS Med 12(3): e1001792. doi:10.1371/journal.pmed.1001792

¹² Queen Mary University, (2018). Helping London's children breathe more easily

¹³ Camden. (2019). [Healthy Streets, Healthy Travel, Healthy Lives: Camden Transport Strategy 2019-2041](#)

¹⁴ Public Health England, (4 June 2018). [Physical inactivity levels in adults aged 40 to 60 in England 2015 to 2016](#)

¹⁵ Royal College of Paediatrics and Child Health, (n.d.). Health inequalities and climate change tool

¹⁶ Nguyen, E., (2022) Studying the impact of climate change on older adult health and well-being. National Institute on Aging

¹⁷ Transport for London, (2023). [Travel in London 2023](#).

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Disability, including family carers

In the 2011 Census, 14.4% of Camden's respondents said they suffered from a long-term illness that limited their daily activities in some form. This is lower than the national figure of 17.9% for long-term illness and is likely to be due to the lower older population within Camden compared to the national figure. The percentage of the population providing 20 hours or more of unpaid care a week has increased from 2.2% to 2.6% since 2001.

Walking and bus services are the modes most frequently used by disabled people¹⁸. Data shows 86% of Camden residents with a disability make their journeys on foot (58%) and/or by public transport (28%). Disabled people drive less than non-disabled people, 9% of Camden residents, with a disability, drive or are driven, compared to 13% of residents with no disability. Of Camden residents' trips, disabled residents' trips by taxi are only 1% higher than Camden residents without a disability (4% vs 3%). Within London as a whole, disabled people are less likely to hold a drivers' license compared to non-disabled people – 40% compared to 68%. Furthermore, in London 52% of disabled people live in a car free household. The share of trips made by cycling in Camden reflects London wide trends – disabled people are less likely to cycle, making only 1% of trips using this mode, compared to 3% for non-disabled people. Prioritising walking, cycling and public transport over vehicle ownership and use would therefore also support those with a disability. Furthermore, reducing motor vehicle traffic levels could improve efficiency on the roads for those disabled people who have an essential need for a motor vehicle.

In the consultation, 14% of respondents indicated that they had one or more disabilities, which is similar to the proportion of disabled people among the Camden population. The most common themes among disabled respondents were that proposed prices were too high and that changes to Visitor permits would reduce social connectivity. Among disabled respondents, there was a higher number of people over 65 years old compared to all respondents. Many of the disabled respondents mentioned mobility issues as a result of old age and the need for a vehicle to move about the borough.

Gender reassignment

N/A – no relevant data applicable for this scheme and there is no evidence to suggest that this project would have a disproportionate negative or positive impact on this characteristic

Marriage and civil partnership

N/A – no relevant data applicable for this scheme and there is no evidence to suggest that this project would have a disproportionate negative or positive impact on this characteristic

Pregnancy and maternity

In the year to mid-2021, there were 2,266 births to Camden-resident mothers. Since 2011-12, annual births in Camden have reduced by -27%. While this is part of a wider national (-16%) and London (-18%) trend, Camden has seen the 6th largest fall in birth over the last decade in London.¹⁹

¹⁸ Camden, (2019). [Healthy Streets, Healthy Travel, Healthy Lives: Camden Transport Strategy 2019-2041](#)

¹⁹ London Borough of Camden. (2023) [Demographic Databook](#)

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Air pollution, particularly of particulate matter, affects maternal health, including increasing the risk of pre-eclampsia (a serious cardiovascular condition of pregnancy), as well as impacts the health of the child, including low birth weight.²⁰ If the proposals succeed in their intended aim of improving air quality and improving road safety (through reduced motor vehicle levels), this could have a positive impact on parents by improving the health and safety of their children.

Race

Black Asian Minority Ethnic (BAME) people made up 40.5% of Camden's population in 2021, an increase from 31% since 2011²¹. In London, BAME residents are less likely to own a car, with 30% of Black residents owning a car compared to 43% of White residents.²² Furthermore, walking is the most commonly used form of transport for BAME Londoners, with taking the bus the second most commonly used transport mode. BAME Londoners walk and use the bus at higher rates than white Londoners.²³ However, BAME residents are disproportionately affected by the impacts of road pollution, including noise pollution, air pollution and road danger.²⁴

²⁵

Religion or belief

According to 2021 Census data, the most common religion in Camden is Christianity, with 31.4% of the borough identifying as Christian. Another 16.1% identified as Muslim while 4.8% of people identified as Jewish. 34.6% of residents do not have a religion. Camden is home to various places of worships and the Council recognises that being able to access these places is important across all religions.

Sex

Slightly over half of Camden's population is female at 51%, this is almost identical to Greater London as well as the UK. Women only make up 27% of cycle trips in London²⁶ and are one of the groups of people who have a disproportionately higher desire for protected cycling infrastructure and direct routes. There is also greater potential for walking trips among women than men.

Safety and security on public transport and at stations is also a concern for women who often feel vulnerable in these places, which may act as a barrier for some in switching from private vehicles to public transport. According to data for London (Camden specific data is not available) most trips made by women are on foot, around 35%, compared to men at just under 30%. Around 27% of men's trips are driven compared to 20% for women, although women are more likely to be passengers at approximately 15% of their trips compared to 10% for men. However, in total the majority of trips taken by both sexes are using modes other than private vehicles.

²⁰ Royal College of Obstetricians & Gynaecologists, (16 June 2022). [UK Government must stop ignoring impact of air pollution in pregnancy and set air quality targets which protect the health of future generations](#)

Mitku, A.A., Zewotir, T., North, D. *et al*, (2023). Impact of ambient air pollution exposure during pregnancy on adverse birth outcomes: generalized structural equation modeling approach. *BMC Public Health* **23**, 45. <https://doi.org/10.1186/s12889-022-14971-3>

²¹ London Borough of Camden, (2023). [Camden Profile](#).

²² Transport for London. [Roads Task Force – Technical Note 12 How many cars are there in London and who owns them?](#)

²³ Transport for London, (2019). [Travel in London: Understanding our diverse communities 2019](#).

²⁴ Camden, (2019). [Healthy Streets, Healthy Travel, Healthy Lives: Camden Transport Strategy 2019-2041](#)

²⁵ Logika Noise Air Quality, (2021). [Air Pollution and Inequalities in London: 2019 Update](#).

²⁶ Transport for London, (2017). [Analysis of Cycling Potential 2016](#).

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Sexual orientation

N/A – no relevant data applicable for this scheme and there is no evidence to suggest that this project would have a disproportionate negative or positive impact on this characteristic

Intersectional Groups

Intersectional groups identified are older disabled people and low-income BAME people. The information covering these groups is included in the Age, Race, Low-Income Households, and Disability sections.

2.b Consider evidence in relation to the additional characteristics that the Council is concerned about:

- Foster carers
- Looked after children/care leavers
- Low-income households
- Refugees and asylum seekers
- Parents (of any gender, with children aged under 18)
- People who are homeless
- Private rental tenants in deprived areas
- Single parent households
- Social housing tenants
- Any other, please specify

Foster carers

A number of foster carers have been identified in Camden. There are also likely to be additional foster carers outside of the borough who travel to and within Camden to support foster children from Camden. Proposed changes to parking fees and charges and/or terms and conditions may therefore have an impact on these carers.

Looked after children/care leavers

N/A - no relevant data applicable for this scheme. The main impacts identified by this assessment was in conjunction to potential intersections with low-income.

Low-income households

13% of Camden households have an annual median income of less than £20,000²⁷. As of 2019, 14.1% of the Camden population were income deprived, meaning they were either out of work or in work but had low earnings. The full set of indicators used to define income deprivation can be found in the [English Indices of Deprivation Report](#), but include adults and children in Income Support families, in income-based Jobseeker's Allowance families and in income-based Employment and Support Allowance families, among others. 32 of the 133 neighbourhoods in Camden were among the 20% most income-deprived in England.²⁸ Walking is the most commonly used type of transport by Londoners with low incomes (93 per cent walk at least once a week) in line with all Londoners (95 per cent). The bus is the next most common type of transport used by Londoners on lower incomes (69 per cent use the bus at least once a week, compared with 59 per cent of all Londoners.²⁹

²⁷ CACI. (2022). [Paycheck equivalised household income 2022](#).

²⁸ Office for National Statistics, (2021). [Exploring local income deprivation](#).

²⁹ Transport for London, (2019). [Travel in London: Understanding our diverse communities 2019](#).

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In mapping out the distribution of car owners in the borough against the levels of deprivation (Figure 1), it is evident that areas of high deprivation (generally lower income) have much lower rates of car ownership than areas with low deprivation (generally higher income). The wards with the highest concentration of low-income households in 2022 were St Pancras and Somers Town, Regent's Park and King's Cross. These wards had average car ownership rates of 26%, 29% and 24%, respectively, which are all lower than the borough-wide average car ownership rate of 35%. This is supported by evidence in the Camden Transport Strategy Evidence Base Report³⁰ shows that areas in Camden with the highest Indices of Multiple Deprivation (IMD) are comparatively less likely to own a vehicle.

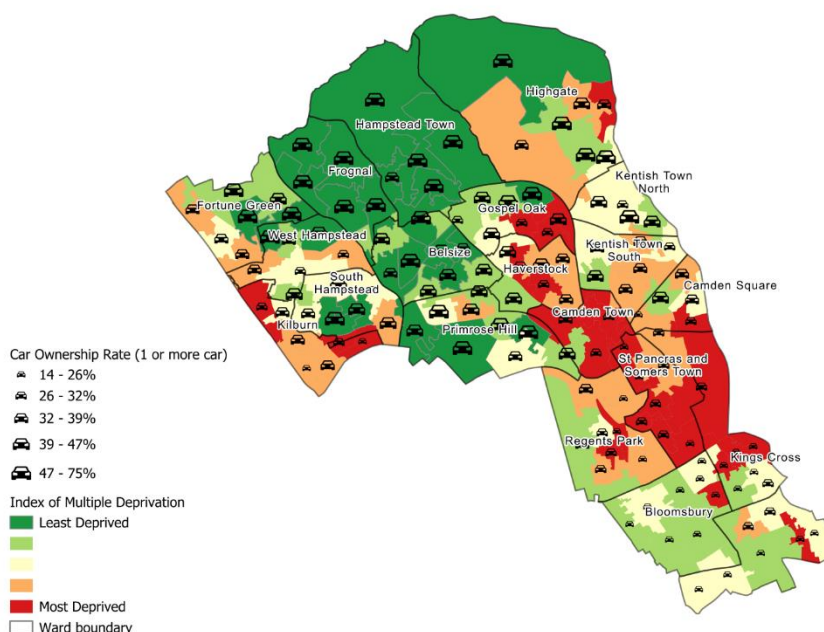


Figure 1 Car ownership rates against index of multiple deprivation in Camden wards

However, the consultation results suggest that there is a concern for how the proposals would impact low-income communities and that these concerns are coming from areas that are generally lower income. As Figure 2 shows, in the wards with higher deprivation (specifically Camden Town, Kilburn and St Pancras and Somers Town), a greater percentage of consultation respondents were concerned with how the proposed price increases would impact low-income people. Conversely, in wards with lower deprivation (specifically Hampstead Town and Frognal), a smaller percentage of respondents were concerned with the impact on low-income people.

³⁰ Camden, (2019). [Appendix G Camden Transport Strategy Evidence Base Report](#).

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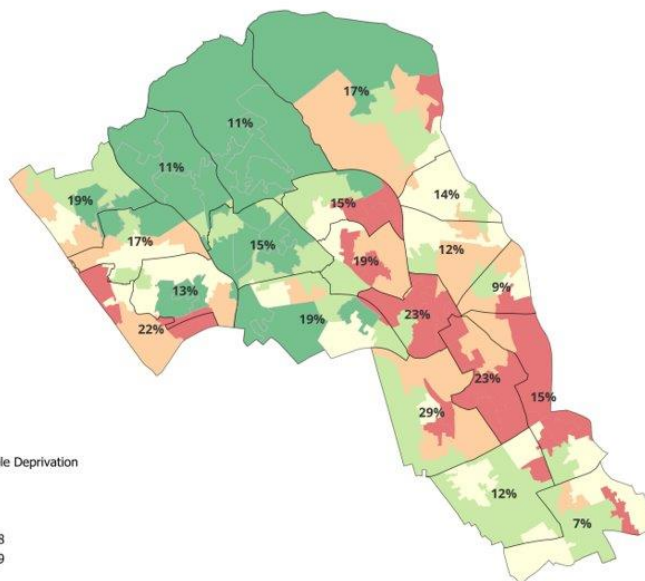


Figure 2 Percentage of respondents concerns with impact of proposals on low-income people by ward

Enabling and incentivising the uptake of more affordable transport modes (walking and cycling) that could arise following these proposed parking changes were assessed as having a potentially positive outcome on low-income households, as well as on individuals with other protected and additional characteristics that intersect with low income

Refugees and asylum seekers

N/A - no relevant data applicable for this scheme. The main impacts identified by this assessment was in conjunction to potential intersections with low-income.

Parents (of any gender, with children aged under 18)

According to 2021 Census data, Camden had 21,067 households with dependent children, representing 23% of all households in Camden. Especially for those parents with young children, driving may be the preferred method of transportation, in which case they may be negatively impacted by the proposed parking changes. However, it should be noted again that 2/3 of Camden households do not own a car/van. Assuming that this rate is similar among parents, the majority of parents do not own a car/van. If the proposals succeed in their intended aim of improving air quality and improving road safety (through reduced motor vehicle levels), this could have a positive impact on parents by improving the health and safety of their children.

People who are homeless

Data provided by the Combined Homelessness and Information Network³¹ estimates that the number of people seen rough sleeping in Camden for 2022/23 was 719, up from 666 in 2021/22. Rough sleeping is when people are bedded down in the open air (such as on the streets) or in places not designed for habitation (such as stairwells and sheds). The UK Department for Levelling UP, Housing & Communities reported 776 households in Camden in 2022/23 that were owed a prevention or relief duty. As people who are homeless spend a larger amount of time on streets, they are impacted by changes to traffic levels and air pollution, and road safety – all issues which these proposals aim to contribute towards improving.

³¹ Greater London Authority, (2023). [Rough Sleeping in London \(CHAIN Reports\)](#).

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Private rental tenants in deprived areas

N/A - no relevant data applicable for this scheme. The main impacts identified by this assessment was in conjunction to potential intersections with low-income.

Single parent households

According to 2021 Census data, there were 5,954 single parent families in Camden. Compared to nuclear family parents, single parents usually have more daily trips, spend more time on transportation, and spend more time outside their home per day on average.³² Single parent households may rely on private vehicle ownership to transport their children, especially young children and as such, may be impacted by parking charge increases and changes. As above, if the proposals succeed in their intended aim of improving air quality and improving road safety (through reduced motor vehicle levels), this could have a positive impact on parents by improving the health and safety of their children.

Social housing tenants

N/A - no relevant data applicable for this scheme. The main impacts identified by this assessment was in conjunction to potential intersections with low-income.

Any other, please specify

N/A - no relevant data applicable for this scheme.

2.c Have you found any data or evidence about intersectionality. This could be statistically significant data on disproportionality or evidence of disadvantage or discrimination for people who have a combination, or intersection, of two or more characteristics.

An intersectional group identified is disabled people in low-income households. Evidence from the Equality and Human Rights Commission find that households with a disabled person or people have higher levels of relative poverty than households with no disabled people.³³ More generally, people who share the demographics of more than one protected and additional characteristic group are more likely to have lower-incomes or be in debt and experience problems related to these.³⁴ Furthermore, there is also evidence that intersectionality between multiple protected characteristics and additional characteristics can not only compound barriers to accessing transport overall but also those to walking and cycling specifically.³⁵

If the proposals are successful in reducing motor traffic levels, this could have a positive impact on road safety and potentially promote the adoption of active travel methods by those with multiple protected characteristics. Further information covering these groups is included in the Disability and Low-income Households sections.

Step 3: Impact

3.a Potential negative impact on protected characteristics

³² Chlond, B. & Ottmann, P., (2007). The mobility behaviour of single parents and their activities outside the home. German Journal of Urban Studies.

³³ Equalities and Human Rights Commission, (2022). Low income and debt problems inquiry.

³⁴ Equalities and Human Rights Commission, (2022). Low income and debt problems inquiry

³⁵ Sustrans, (2022). [Helping people through the cost-of-living crisis and growing our economy.](#)

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Protected Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Age	Yes	<p>Although it would be possible to park in the same places, the costs of parking products would rise which may affect the ability of older people to travel by motor vehicle if they are not made aware of the changes and given that a quarter of Camden residents over 65 live in poverty³⁶. This may cause additional stress for older people, particularly in the introductory period when the changes are rolled out. To mitigate this, the council would ensure that information about new fees is communicated across the whole borough, including in non-digital forms, so people who do not have access to internet or smart phones would be informed about the changes. Furthermore, it is proposed that all charge increases are phased in over two years. People over 75 years old would remain eligible for 50% discounted Visitors permits and it is proposed that the allowance of 600 hours of short stay and 10 all day permits currently offered for CPZs north of Euston Road will be extended to CPZs south of Euston Road for those over 75.</p> <p>It is proposed that scratch-card type Visitor permits are removed for the majority of customers but retained for Assisted Customers (those customers registered by Contact Camden as digitally excluded). If these proposals are approved, older people might be affected by Scratch Cards no longer being issued if they are not considered Assisted Customers. These residents currently using scratch cards would be moved to the online Visitor permit although it is proposed that any scratch card Visitor permits currently in possession by Camden residents would still be valid following the adoption of the proposal. Support would be available via phone for those residents who cannot use our online service. For those who are still unable to use the digital Visitor permits, they would be able to purchase Visitor permits over the phone through Contact Camden. Furthermore, they could nominate a person to purchase Visitor permits on the online system for them. Finally, Camden would implement a new Integrated Voice Recognition (IVR) telephone service to support customers who need out-of-hours access to telephone booking. When using the IVR service, the resident will need to have a parking permit account with a valid telephone number (landline or mobile). On calling Contact Camden, the IVR option will be made available as part of the options. The resident will then be</p>

³⁶ Camden, (n.d.). [Focus on Older People](#).

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Protected Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
		<p>prompted to add the visitor's vehicle registration, duration required and payment. The overall average call time to make a transaction is 61 seconds. This can increase to 100 seconds when the resident is adding a new vehicle and/or payment card. Multiple numbers can be set up on an account such that a resident's relative could make a payment on the resident's behalf, supporting the resident where needed. Where a customer has issues with the IVR (e.g. language recognition) then they are directed to the suppliers contact centre who can help. This is about 0.25% of all calls.</p> <p>Camden also runs the Digital Support Bus, where staff and volunteers provide in-person advice and digital skills support. This support will also include helping citizens use the new IVR service. The support bus targets areas where Camden can make the biggest difference in getting citizens online.</p> <p>There is also support for older persons to use alternative modes of transport. The Older Persons Freedom Pass offers free travel on public transport at any time of day or night, this includes:</p> <ul style="list-style-type: none"> • Transport for London buses (in the Greater London area) • London Underground (the 'tube') • Overground • Docklands Light Railway network • London Trams <p>The pass is also valid on local bus services run by other bus companies which are outside the TfL bus network and on most local rail services in London, however users might have to travel at specific times, for more information please visit: Older persons Freedom Pass website.</p> <p>The London Taxicard Scheme offers subsidised travel in licenced taxis and private hire vehicles to London residents with serious mobility impairments or who are severely sight impaired. This could offset some of the increase in costs resulting from higher parking charges. For more information, please visit: Taxicard website.</p>

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Protected Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
		<p>Persons 85 and older are also eligible for a Dial-a-ride membership, which is a free door-to-door service through TfL. Rides can be booked by phone or through the new app.</p>
Disability including carers	Yes	<p>No changes would be made to Blue and Green badges for disabled people or dedicated disabled parking bays. Blue badge holders can park in Resident permit bays and paid for parking bays for free with no time limit and in blue badge bays for free but with some time limits. Blue badge holders can also park for free up to three hours on a single or double yellow line where there is no loading ban. Blue badge holder cannot park in the green badge area (which is the central London area of Camden) unless they live, study or work there, in which case they can apply for a Green badge. Within the green badge area, green badge holders can park in green badge bays, paid for parking bays, Resident permit holders' bays, and shared use loading/blue badge parking bays (with certain time restrictions).</p> <p>Furthermore, disabled people remain eligible for discounted Visitors permits, which like above, would be extended to CPZs south of Euston Road. Blue badge holders are also eligible for concessions for parking at certain hospitals in the south of the borough.</p> <p>Although, it would be possible to park in the same places, the costs of all parking products would rise which may affect the ability of Carers to travel by car if they are not aware of the changes. This could cause additional stress, particularly in the introductory period when the changes would be rolled out. To mitigate this, the council would ensure that information about new fees is communicated across the whole borough and employ Camden's Carer's network to disseminate information. Communications would include non-digital forms so people who do not have access to internet or smart phones would be informed about the changes. Furthermore, it is proposed that charge increases, as outlined in Amendment A7 in the main report, are phased in over two years.</p> <p>The increase in prices may be considered by some to interfere with a Carer's responsibility to provide</p>

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Protected Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
		<p>essential care for a person they are caring for. As set out elsewhere, however, the change in prices would not restrict the ability to drive but would help incentivise the use of Camden’s alternative, dense network of public and shared transport options.</p> <p>The council would also like to make sure that disabled people feel supported in their everyday travels. The council recognises that some people in Camden will still need a vehicle and changing the way we travel would mean more space for them on the roads. Camden offers a range of services that disabled people can use to get around easily.</p> <p>These services include:</p> <ul style="list-style-type: none"> • PlusBus Door to Door • Blue and Green parking badges • ScootAbility • Taxicard • Freedom Pass • Independent travel training • Dial-a-ride (now bookable through the app as well as phone) <p>The council will continue to develop and change our public spaces to make it easier for disabled people to travel more healthily and sustainably in our borough. We aim to improve this through:</p> <ul style="list-style-type: none"> • Collecting more data on how disabled resident's travel • Accessibility audits, where disabled people visit our streets and report to us on their experience of travelling • Equality Impact Assessments • Better streets with less clutter, better crossings and more space for cycling • Step free access to buses • Liaising with TfL to provide more step free access to the tube and trains • More disabled parking spaces • Providing Camden Accessible Transport Service transport options <p>More information on the schemes mentioned above can be found on the council’s dedicated website for disabled and older persons travel support.</p>

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Protected Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
		<p>Additionally, Carers who regularly drive may find that parking and therefore using a private vehicle result in much higher costs that they would not be able to cover, this could be problematic particularly when Carers have to carry specific equipment to attend to their duties. Carers could also be potentially negative impacted by the reduction in maximum stay at paid for parking if they cannot obtain Visitor permits for their visits and if they require longer visits. There is a variety of options and support available for residents, businesses and visitors to change the way we travel in Camden:</p> <ul style="list-style-type: none"> • A dense public transport network, including underground, overground and bus services • Car clubs, which allow residents and businesses to use a car without owning one, more information on this can be found on the council's Car Clubs website. • Dockless Bike Share and e-scooters, which allow to rent an electric bike or an e-scooter from the electric bike operator Lime and Human Forest, more information on this can be found on the councils Dockless Bike Share website. Discounts for disabled people are available from Lime, Voi and Dott • Cargo bike scheme which allows residents and businesses to rent cargo bikes by the hour, more information on this can be found on the councils cargo bike scheme website. • ULEZ scrappage scheme, which provides grant payments to successful applicants to scrap or retrofit vehicles that do not meet the emissions standards, and to switch to cleaner, greener modes of transport. As of August 4, 2023, grants up to £10,000 have been available to scrap wheelchair accessible vehicles, an increase from the £5,000 previously available under the scheme. More funds are available for charities, sole traders and businesses to scrap or retrofit vans and minibuses, more information on this can be found on ULEZ scrappage scheme website and on ULEZ support offers website. • Cycle courses, which allow adults and children to develop their cycling skills and learn about bike maintenance, more information can be found on the cycle skills and bike maintenance website. • Try-a-Bike, which allows adults who live, work or study in Camden borrow a bike for 30 days.

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Protected Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
		<ul style="list-style-type: none"> • Try Before You Bike, which allows people who live, work or study in Camden to trial an e-cargo bike by paying monthly and if they decide to purchase the bike, discount the money already spent on the subscription.
Gender reassignment	No	N/A - Officers do not consider that the proposed changes would have any negative impact on gender reassignment.
Marriage/civil partnership	No	N/A - Officers do not consider that the proposed changes would have any negative impact on marriage/civil partnership.

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Protected Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Pregnancy/ maternity	Yes	<p>Higher costs of permits and/or parking charges set out in these proposals may be perceived as decreasing access to services for a pregnant person or a person with very young children if they rely on a motor vehicle for transport. Pregnant people or parents/carers with young children may have reduced mobility and be more reliant on vehicle transport, therefore they could be particularly impacted by the parking fees increases. However, there are various ways pregnant people and parents can travel by alternative modes to private vehicles in Camden:</p> <ul style="list-style-type: none"> • The Baby on Board badge was launched by TfL in 2006 in order to help pregnant people who felt awkward or perhaps intimidated to ask for a seat on public transport. • Car clubs, which allow residents and businesses to use a car without owning one, more information on this can be found on the council's Car Clubs website. Residents and Businesses can take advantage of the Camden Car Club Parking Permit Scrappage Scheme to receive free annual membership and driving credits to a car club if they turn in their parking permit, subject to availability. • Dockless Bike Share and e-scooters, which allow to rent an electric bike or an e-scooter from the electric bike operator Lime and Human Forest, more information on this can be found on council's Dockless Bike Share website. • Cycle courses, which allow adults and children to develop their cycling skills and learn about bike maintenance, more information can be found on the cycle skills and bike maintenance website. • ULEZ scrappage scheme, which provides grant payments to successful applicants to scrap or retrofit vehicles that do not meet the emissions standards, and to switch to cleaner, greener modes of transport. More fund are available for charities, sole traders and businesses to scrap or retrofit vans and minibuses, more information on this can be found on ULEZ scrappage scheme website and on ULEZ support offers website. Successful participants of the scrappage scheme may be eligible for additional car club discounts through Zipcar and Enterprise.

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Protected Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
		<ul style="list-style-type: none"> • Try-a-Bike, which allows adults who live, work or study in Camden borrow a bike for 30 days. • Try Before You Bike, which allows people who live, work or study in Camden to trial an e-cargo bike by paying monthly and if they decide to purchase the bike, discount the money already spent on the subscription. Camden would also subsidise the purchase of bicycle child seats to specifically support parents and carers. <p>In addition, it is noted that only around a third of households in Camden own a motor vehicle, and so these proposals would not affect the majority of households.</p>
Race	No	N/A - Officers do not consider that the proposed changes would have any negative impact on race.
Religion or belief	Yes	<p>An email was received during the consultation from a Synagogue located in the Borough around concern over the removal of scratch cards. Specifically, the synagogue cannot purchase digital Visitor permits for their congregants who need to travel by car during Shabbat as it would breach Shabbat laws.</p> <p>The Council will meet with representatives of the synagogue to discuss these concerns and explore suitable mitigations. As noted elsewhere in this report, it is proposed that scratch cards are retained for Assisted Customers, or those customers registered by Contact Camden as digitally excluded. Residents can also nominate another person to use the digital system to purchase a permit in their place. Furthermore, the Blue Badge scheme provides free parking for disabled people, and there is a dense network of public and shared transport options for those who are able to use those forms of travel to reach their destination in the Borough.</p>

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Protected Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Sex	Yes	<p>Some women might feel less safe at night walking or cycling, or indeed using public transport than driving. Women’s perception of safety and insecurity can deter them from using active travel modes. In 2022/23, Camden conducted a Women’s Safety Survey to better understand how safe people feel around Camden and found that over 70% of respondents felt unsafe walking or travelling around Camden at night while 77% of respondents stated they had experienced street harassment or abuse at some point.</p> <p>Since the survey was conducted, the Council has launched the Camden Safety Hub to support those who find themselves in a vulnerable state while out on a Friday or Saturday night. This is in addition to Community Presence Officers conducting NightTime Economy patrols on Fridays and Saturdays. The Council has also conducted walkabouts to identify and address some of the issues raised in the survey as well as started to collect and monitor data from the MET Police on violence against women and girls’ incidents and enforcement.</p> <p>Women are often the main carers for their families and/or young children. If an adequate and easily accessible alternative to motor vehicle transport is not provided, women might be disproportionately affected by the increase in parking product prices.</p> <p>There is a variety of options and support available for residents, businesses and visitors to change the way we travel in Camden:</p> <ul style="list-style-type: none"> • A dense public transport network, including underground, overground and bus services • Car clubs, which allow residents and businesses to use a car without owning one, more information on this can be found on the council’s Car Clubs website. Residents and Businesses can take advantage of the Camden Car Club Parking Permit Scrappage Scheme to receive free annual membership and driving credits to a car club if they turn in their parking permit, subject to availability. • Dockless Bike Share and e-scooters, which allow to rent an electric bike or an e-scooter from the electric bike operator Lime and Human Forest,

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Protected Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
		<p>more information on this can be found on council's Dockless Bike Share website.</p> <ul style="list-style-type: none"> • Cargo bike scheme which allows residents and businesses to rent cargo bikes by the hour, more information on this can be found on the council's cargo bike scheme website. • Cycle courses, which allow adults and children to develop their cycling skills and learn about bike maintenance, more information can be found on the cycle skills and bike maintenance website. • Try-a-Bike, which allows adults who live, work or study in Camden borrow a bike for 30 days. • Try Before You Bike, which allows people who live, work or study in Camden to trial an e-cargo bike by paying monthly and if they decide to purchase the bike, discount the money already spent on the subscription. Camden will also subsidise the purchase of bicycle child seats to specifically support parents and carers. • ULEZ scrappage scheme, which provides grant payments to successful applicants to scrap or retrofit vehicles that do not meet the emissions standards, and to switch to cleaner, greener modes of transport. More funds are available for charities, sole traders and businesses to scrap or retrofit vans and minibuses, more information on this can be found on ULEZ scrappage scheme website and on ULEZ support offers website. Successful participants of the scrappage scheme may be eligible for additional car club discounts through Zipcar and Enterprise.
Sexual orientation	No	N/A - Officers do not consider that the proposed changes would have any negative impact on sexual orientation.

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3.b Potential positive impact on protected characteristics

Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Age	Yes	<p>An increase in activity, including walking and cycling, benefits children in terms of reducing childhood obesity, especially given that data shows higher car ownership is linked to lower levels of physical activity. In Camden, only one in eight 15-year-olds meet the required level of weekly physical activity recommended by the UK Government's Chief Medical Officer.³⁷ A survey conducted of school children across the UK found that 38% of children felt the lack of safe routes was a barrier to cycling and 41% felt traffic was too fast for pedestrians and cyclists.³⁸ Data from the UK Department of Transport showed that 1 in 10 cyclist casualties were young people under 16 years old and that 6 children are involved in some kind of road accident daily in the UK.³⁹ Reduced road danger, including by reducing the volume of motor vehicle traffic, can help facilitate independent travel for children and young people, which is crucial to healthy child development and help young people meet the recommended level of physical activity.</p> <p>Air pollution from motor vehicles has a significant impact on younger people who are closer to the vehicle exhaust level and who have lungs that are still developing. According to the European Environment Agency (EEA)⁴⁰, this impact can result in significant health complications later in life impacting their life expectancy and quality of life. Older adults are also known to be particularly sensitive to air pollution. One of the main objectives of the parking fees and charges review is a reduction in motor vehicle usage and emission-based charging which would, if approved, contribute to improving air quality in Camden.</p> <p>Disabled children, including those with mobility impairments, and older people, who have higher instances of conditions such as mobility impairment, deafness or blindness, would benefit from reduced traffic and road danger because of the lower motor vehicle usage. In addition, older people are also more</p>

³⁷ Camden, (2019). [Healthy Streets, Healthy Travel, Healthy Lives: Camden Transport Strategy 2019-2041](#)

³⁸ Stevenson, John, (10 February 2015). [Safety fears deter kids and teens from cycling, survey finds.](#)

³⁹ Hambleton, Mark. (25 August 2023). [Parents' safety warning, as 1 in 10 cyclist casualties under the age of 16.](#)

⁴⁰ European Environment Agency, (2023). [Air pollution and children's health.](#)

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Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
		<p>likely to live with dementia and may benefit from reduced noise pollution. Those older people who are able to increase their active travel may see benefits to their mobility and physical and mental health.</p> <p>Providing safer cycling conditions, by reducing the volume and dominance of motor vehicles, can increase the propensity of children and older people to cycle, thereby improving their mental and physical health, independent mobility, social inclusion and improved access to opportunities.</p> <p>Given that the impacts of climate change will be increasingly felt in the coming decades, children and young people would potentially benefit from actions, like reduced vehicle use and a shift towards lower carbon-emitting vehicles, that mitigate climate change and reduce the severity of future climate-related events.</p>
Disability including carers	Yes	<p>Compared to the London average, there is a higher proportion of people in Camden who identify themselves as being disabled (15.2%, compared to the Greater London average of 13.2%)⁴¹.</p> <p>In residential areas, those with cognitive disabilities could benefit from reduced levels of noise pollution coming from motor vehicles as motor vehicles usage decreases. Research has shown that one of the main reasons that disabled people do not cycle more is due to inaccessible infrastructure, even though 75% of disabled cyclists report that they find cycling easier than walking.⁴² In the future, existing parking spaces could be transformed into attractive and functional public spaces which would be accessible for all. Reducing motor vehicle usage and encouraging a shift to active forms of travel can increase the propensity of people with a disability to cycle (including the use of adapted cycles), thereby helping improve mental and physical health, supporting independent mobility, social inclusion and improved access to opportunities.</p> <p>The council would also like to make sure that disabled people feel supported in their everyday travels. The council recognises that some people in Camden will still need a motor vehicle, and reducing inessential</p>

⁴¹ London Borough of Camden, (2023). [2021 Census Topic Summary Health, Disability & Unpaid Care](#).

⁴² Wheels for Wellbeing, (2018). [Assessing the needs and experiences of Disabled cyclists - Annual Survey](#).

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Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
		<p>motor vehicle trips can mean more space for on the roads that have an essential need for a motor vehicle. Camden also offers a range of services that disabled people can use to get around the Borough and beyond:</p> <p>These services include:</p> <ul style="list-style-type: none"> • PlusBus Door to Door • Blue and Green parking badges • ScootAbility • Taxicard • Freedom Pass • Independent travel training • Dial-a-ride (now bookable through the app as well as phone) <p>Disabled people are also eligible for discounted e-cycle and e-scooter rides through Lime Access, Dott and Voi.</p> <p>The council continues to develop and change our public spaces to make it easier for disabled people to travel more healthily and sustainably in our borough. We aim to improve this through:</p> <ul style="list-style-type: none"> • Collecting more data on how disabled resident's travel • Accessibility audits, where disabled people visit our streets and report to us on their experience of traveling • Equality Impact Assessments • Better streets with less clutter, better crossings and more space for cycling • Step free access to buses • Liaising with TfL to provide more step free access to the tube and trains • More disabled parking spaces • Providing Camden Accessible Transport Service <p>More information on the schemes mentioned above can be found on the council's dedicated website for disabled and older persons travel support.</p>

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Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Gender reassignment	No	Officers do not consider that the proposed changes would have any specific positive impact on gender reassignment. However, the potential positive outcomes from the proposals – improved air quality, reduced carbon emissions, reduced motor vehicle dominance and increased uptake of sustainable/healthy modes of travel, could have a beneficial impact for everyone living in and visiting the Borough. This includes potential improvements to mental and physical health, independent mobility, social inclusion and improved access to amenities, services, and opportunities.
Marriage/civil partnership	No	Officers do not consider that the proposed changes would have any specific positive impact on marriage/civil partnership. However, the potential positive outcomes from the proposals – improved air quality, reduced carbon emissions, reduced motor vehicle dominance and increased uptake of sustainable/healthy modes of travel, could have a beneficial impact for everyone living in and visiting the Borough. This includes potential improvements to mental and physical health, independent mobility, social inclusion and improved access to amenities, services, and opportunities.
Pregnancy/maternity	Yes	<p>Reduced motor vehicle usage, which is an outcome that this project intends to contribute towards, would result in lower volumes of traffic which would create a less stressful environment, supporting a healthy pregnancy.</p> <p>Parents and Carers with prams would benefit from a better walking environment and reduced traffic flows when crossing roads.</p> <p>Parents or Carers who use cycles or cargo cycles for family mobility would benefit from safer environment on roads and more space on the carriageway.</p> <p>Pregnant people and unborn children in particular may be adversely impacted by air pollution. An increase in parking fees and charges, if approved, is expected to contribute to reducing motor vehicle usage, particularly for high emitting vehicles, which would contribute to improved air quality on these streets and subsequent improved health indicators among pregnant people and</p>

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Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
		<p>unborn children⁴³.</p> <p>Pregnant people or parents/Carers with young children may have reduced mobility, take longer to cross the road, and be more vulnerable to traffic collisions. Therefore, they may be particularly impacted by motor vehicle dominance in the borough as well as harmful emissions.</p>
Race	Yes	<p>As Black Asian Minority Ethnic (BAME) residents are less likely to drive and more likely to rely on walking, cycling and public transport, this protected characteristic group may benefit from improved reduced motor vehicle dominance which is likely to increase safety for other road users and creates opportunities to change the way some of the kerbside space is used. Low-income and BAME individuals are the two groups most exposed to poor air pollution in London. Therefore, BAME residents (and particularly low-income BAME residents) would benefit from fewer high emitting vehicles and less traffic pollution.</p>
Religion or belief	No	<p>Officers do not consider that the proposed changes would have any specific positive impact on religion or belief. However, the potential positive outcomes from the proposals – improved air quality, reduced carbon emissions, reduced motor vehicle dominance and increased uptake of sustainable/healthy modes of travel, could have a beneficial impact for everyone living in and visiting the Borough. This includes potential improvements to mental and physical health, independent mobility, social inclusion and improved access to amenities, services, and opportunities.</p>
Sex	Yes	<p>Women - who are more likely than men to be moving through public space with pushchairs and prams, and expectant mothers and mothers with young children - may also particularly benefit from improved road safety and air quality, particularly when walking or cycling.</p> <p>In London, women are less represented than men in cycling, and lack of safe cycle infrastructure disproportionately impacts women, attributable in part to a more risk averse attitude to mixing with traffic and to women experiencing higher rates of aggression and</p>

⁴³ Pederson, M, Leslie Stayner, *et. al.*, (2014). Ambient Air Pollution and Pregnancy-Induced Hypertensive Disorders. Hypertension 64:3. <https://doi.org/10.1161/HYPERTENSIONAHA.114.03545>

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Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
		near miss incidents while cycling than men ⁴⁴ . Research has shown that women particularly value protected cycle facilities and direct routes such as cycleways. Reduced motor vehicle usage and Camden's extensive cycle infrastructure may benefit and empower more women to cycle.
Sexual orientation	No	Officers do not consider that the proposed changes would have any specific positive impact on sexual orientation. However, the potential positive outcomes from the proposals – improved air quality, reduced carbon emissions, reduced motor vehicle dominance and increased uptake of sustainable/healthy modes of travel, could have a beneficial impact for everyone living in and visiting the Borough. This includes potential improvements to mental and physical health, independent mobility, social inclusion and improved access to amenities, services, and opportunities.

3.c Potential negative impact on other characteristics

Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Foster carers	Yes	A number of foster carers have been identified within Camden. There may be, however, additional foster carers living outside of the borough who may need to travel to Camden. Parking Operations will investigate what needs any such group may have and if possible, seek to provide support where it is available.
Looked after children/care leavers	No	N/A – Officers do not consider there to be any particular negative impacts on looked after children/care leavers.
Low-income households	Yes	There might be lower income residents who use a private motor vehicle, for instance for work, and that might be impacted by higher parking fees and charges, especially if the vehicle they own is high emitting and they do not have the disposable income to purchase a lower emitting model. However, evidence shows that lower-income households are less likely to have access to private motor vehicles ⁴⁵ and tend to be more represented amongst bus passengers. Only around 13% of all Camden

⁴⁴ Aldred, Rachel and Sian Crossweller, (2015). Investigating the rates and impacts of near misses and related incidents among UK cyclists. Journal of Transport & Health 2(3), 379-393.

⁴⁵ Mayor of London, (2022). [Car ownership by household income](#).

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		<p>residents' journeys are made by private car.</p> <p>Purchasing and maintaining a cycle is significantly less expensive than the comparable costs for motor vehicles and can be cheaper than public transport fares. Nonetheless, people with less disposable income may be less able to own a cycle than those with more disposable income. This in turn would mean they would not have equal access to active travel infrastructure.</p> <p>There is a variety of options and support available for residents and visitors to change the way we travel in Camden.</p> <ul style="list-style-type: none">• A dense public transport network, including underground, overground and bus services. Residents may be eligible for TFL discounts, such as the Jobcentre Plus Travel Discount or Bus and Tram Discount Photocard.• Car clubs, which allow residents and businesses to use a motor vehicle without owning one, more information on this can be found on the council's Car Clubs website. Residents and Businesses can take advantage of the Camden Car Club Parking Permit Scrappage Scheme to receive free annual membership and driving credits to a car club if they turn in their parking permit, subject to availability.• A dense public transport network, including underground, overground and bus services. Low-income residents may be eligible for TFL discounts, such as the Jobcentre Plus Travel Discount or Bus and Tram Discount Photocard.• Dockless Bike Share and e-scooters, which allow to rent an electric bike or an e-scooter from the electric bike operator Lime and Human Forest, more information on this can be found on council's Dockless Bike Share website. Discounts for low-income residents are available for Lime, Dott and Voi.• Cargo bike scheme which allows residents and businesses to rent cargo bikes by the hour, more information on this can be found on the council's cargo bike scheme website.• ULEZ scrappage scheme, which provides grant payments to successful applicants to scrap or retrofit vehicles that do not meet the emissions standards, and to switch to cleaner, greener modes of transport. More funds are available
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		<p>for charities, sole traders and businesses to scrap or retrofit vans and minibuses. Eligible small businesses and sole traders are able to scrap up to three vehicles. More information on this can be found on ULEZ scrappage scheme website and on ULEZ support offers website. Additional ULEZ support offers are available for successful scrappage scheme applicants. Participants of the ULEZ scrappage scheme may also be eligible for additional discounts from Zipcar and Enterprise.</p> <ul style="list-style-type: none"> • Cycle courses, which allow adults and children to develop their cycling skills and learn about bike maintenance, more information can be found on the cycle skills and bike maintenance website. • Try-a-Bike, which allows adults who live, work or study in Camden borrow a bike for 30 days • Try Before You Bike, which allows people who live, work or study in Camden to trial an e-cargo bike by paying monthly and if they decide to purchase the bike, discount the money already spent on the subscription. • A wider cost of living package (beyond transport measures) is also available. <p>Furthermore, it should be noted that the maximum Resident permit cost for the most polluting vehicles would still only be £69.86 per month, or £2.30 per day, which is considered reasonable. Based on current volumes, the largest group of vehicles (around 7,000) would be liable for a residential permit charge of £23 per month which is considered reasonable and affordable.</p> <p>Additionally, and in consideration of the consultation responses, the Council would phase in all charge increases over a two-year period. This would assist businesses and individuals, including low-income people, in managing the increased costs. Introducing charges more gradually for everybody helps alleviate the financial burden on low-income individuals who are at risk but do not typically qualify for support or assistance programs.</p>
Refugees and asylum seekers	No	N/A - Officers do not consider there to be any particular negative impacts on refugees and asylum seekers.

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Parents (of any gender, with children aged under 18)	Yes	Especially for those parents with young children, driving may be the preferred method of transportation, including for example on the “school run”. For those parents that do drive, they may be negatively impacted by the increased parking charges and changes to terms and conditions. In addition to the mitigations noted elsewhere in this report, the Council has developed a rolling programme of “Healthy School Streets” which provide safer environments outside of each school in the Borough to enable more walking and cycling trips and decrease reliance on private motor vehicle journeys.
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Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
People who are homeless	No	N/A - Officers do not consider there to be any particular negative impacts on people who are homeless
Private rental tenants in deprived areas	No	N/A - Officers do not consider there to be any particular negative impacts on private rental tenants in deprived areas. Any impacts would relate to those expressed under “low-income households”
Single parent households	No	For single parent households, especially those with young children, driving may be the preferred method of transportation. For those parents that do drive, they may be negatively impacted by the increased parking charges and changes to terms and conditions. See above under “parents” for further information.

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Social housing tenants	No	N/A - Officers do not consider there to be any particular negative impacts on social housing tenants. Any impacts would relate to those expressed under "low-income households".
Any other, please specify	No	N/A

3.d Potential positive impact on other characteristics

Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Foster carers	No	Officers do not consider that the proposed changes would have any specific positive impact on foster carers. However, the potential positive outcomes from the proposals – improved air quality, reduced carbon emissions, reduced motor vehicle dominance and increased uptake of sustainable/healthy modes of travel, could have a beneficial impact for everyone living in and visiting the Borough. This includes potential improvements to mental and physical health, independent mobility, social inclusion and improved access to amenities, services, and opportunities.
Looked after children/care leavers	No	Officers do not consider that the proposed changes would have any specific positive impact on looked after children/care leavers. However, the potential positive outcomes from the proposals – improved air quality, reduced carbon emissions, reduced motor vehicle dominance and increased uptake of sustainable/healthy modes of travel, could have a beneficial impact for everyone living in and visiting the Borough. This includes potential improvements to mental and physical health, independent mobility, social inclusion and improved access to amenities, services, and opportunities.

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Low-income households	Yes	Low-income people, who have greater exposure to air pollution ⁴⁶ , would benefit from improved air quality, and associated health impacts, as the use of high emitting vehicles decreases. In Camden, low-income households also have greater exposure to climate risk and would benefit from reduced greenhouse gas emissions from transport ⁴⁷ . Potential benefits of improved air quality, reduced carbon emissions, reduced motor vehicle dominance and increased uptake of sustainable/healthy modes of travel for low-income groups could include potential improvements to mental and physical health, independent mobility, social inclusion and improved access to amenities, services, and opportunities.
Refugees and asylum seekers	No	Officers do not consider that the proposed changes would have any specific positive impact on refugees and asylum seekers. However, the potential positive outcomes from the proposals – improved air quality, reduced carbon emissions, reduced motor vehicle dominance and increased uptake of sustainable/healthy modes of travel, could have a beneficial impact for everyone living in and visiting the Borough. This includes potential improvements to mental and physical health, independent mobility, social inclusion and improved access to amenities, services, and opportunities.
Parents (of any gender, with children aged under 18)	Yes	<p>As congestion and related air pollution decreases, parents travelling with children may benefit from safer and cleaner streets. More kerbside space specifically dedicated to active transport will facilitate cycling and walking for children and reduce the risk of traffic accidents.</p> <p>The potential positive outcomes from the proposals – improved air quality, reduced carbon emissions, reduced motor vehicle dominance and increased uptake of sustainable/healthy modes of travel, could have a beneficial impact for all parents in the Borough. This includes potential improvements to mental and physical health, independent mobility, social inclusion and improved access to amenities, services, and opportunities.</p>

⁴⁶ Mayor of London, (12 October 2021). [Air Pollution and Inequalities in London: 2019 Update](#)

⁴⁷ Greater London Authority and Bloomberg Associates, (2023). [Climate Risk Mapping](#).

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Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
People who are homeless	Yes	Those who are homeless are likely to spend a large amount of time on the streets and therefore have greater exposure to traffic-related pollution and road traffic danger. As such, people who are homeless may be positively affected by the air quality and road safety improvements that could result from these proposals. People who are homeless may also be particularly impacted by climate risk in the Borough (heat and flooding) and therefore measures to reduce carbon emissions from road transport may be beneficial.
Private rental tenants in deprived areas	No	The potential positive outcomes from the proposals – improved air quality, reduced carbon emissions, reduced motor vehicle dominance and increased uptake of sustainable/healthy modes of travel, could have a beneficial impact for private rental tenants in deprived areas. This includes potential improvements to mental and physical health, independent mobility, social inclusion and improved access to amenities, services, and opportunities.
Single parent households	No	The potential positive outcomes from the proposals – improved air quality, reduced carbon emissions, reduced motor vehicle dominance and increased uptake of sustainable/healthy modes of travel, could have a beneficial impact for single parent households. This includes potential improvements to mental and physical health, independent mobility, social inclusion and improved access to amenities, services, and opportunities.
Social housing tenants	No	The potential positive outcomes from the proposals – improved air quality, reduced carbon emissions, reduced motor vehicle dominance and increased uptake of sustainable/healthy modes of travel, could have a beneficial impact for social housing tenants. This includes potential improvements to mental and physical health, independent mobility, social inclusion and improved access to amenities, services, and opportunities.
Any other, please specify	No	N/A

3.e Consider intersectionality.⁴ Given the evidence listed in step 2, consider and describe

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any potential **positive and negative impacts** this activity could have on people who have a **combination, or intersection, of two or more characteristics**. For example, people who are young, trans and homeless, disabled people on low incomes, or Asian women.

An intersectional group identified is disabled people in low-income households. The information covering these groups is included in the Disability and Low-income Households sections.

In addition, if the proposals are implemented and, as part of a wider package of measures set out in the CTS, are successful in helping to reduce motor vehicle ownership and use, in doing so they would help improve the attractiveness of our streets for pedestrians, cyclists and all vulnerable road users. Some people with intersectional characteristics could benefit from having healthier, more accessible and safer streets (and in turn safer and healthier transport options) arising from the proposals. This includes women, people from Black, Asian and Minority Ethnic groups, disabled people, women who are single parents, refugees, and care leavers

⁴ Intersectionality refers to the interconnected nature of social categorisations such as race, class, and gender as they apply to a given individual or group, regarded as creating overlapping and interdependent systems of discrimination or disadvantage.

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Step 4: Engagement - co-production, involvement or consultation with those affected

4.a How have the opinions of people potentially affected by the activity, or those of organisations representing them, informed your work?

List the groups you intend to engage and reference any previous relevant activities, including relevant formal consultation? ⁵	If engagement has taken place, what issues were raised in relation to one or more of the protected characteristics or the other characteristics about which the Council takes an interest, including multiple or intersecting impacts for people who have two or more of the relevant characteristics?
Businesses	<p>In the 2022/2023 financial year, there were 1,202 Business permits issued, with emission band 121-150g/km having the largest number of permits issued, at 323.</p> <p>During the public consultation undertaken in October/November 2023, 59 businesses provided responses.</p> <p>A few businesses expressed their concern as small businesses in their ability to afford the increased charges, especially against the backdrop of the cost-of-living crisis. One business, a salon, expressed concerns that they would no longer be able to provide home visits to their elderly and disabled customers.</p> <p>A full discussion of business responses and Officer responses to those is included in Appendix 4: Consultation Report.</p>
Doctors	<p>In the 2022/2023 financial year, 45 Doctors permits were issued, with emission band 121-150g/km having the largest number of permits issued, at 15.</p> <p>4 medical practices responded to the consultation and an additional 11 individuals responded who identified as healthcare workers (but without referencing a specific practice).</p> <p>In general, the practices expressed concerns about providing effective care to their elderly patients who require home visits if vehicle use is restricted and if it is difficult to find parking near their practice (with the removal of dedicated bays). The council would mitigate these concerns by engaging with each practice that has dedicated Doctors Bays to develop bespoke solutions for their parking needs.</p> <p>A full discussion of the comments brought up regarding how proposals would affect doctors and Officer responses to those is included in Appendix 4: Consultation Report.</p>

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Low income households	<p>The consultation survey did not specifically request information on respondent income. However, several respondents commented about the impact the proposed changes might have on low-income households. More specifically, it was expressed that low-income households could not afford the increase in permit and parking charges and could not afford to purchase an electric vehicle to benefit from lower permit and parking prices.</p> <p>A full discussion of the concerns brought up around the potential impact on low-income households and Officer responses to those is included in Appendix 4: Consultation Report.</p>
All Camden residents and visitors	<p>2,717 residents and visitors responded to the consultation survey. As mentioned above, several respondents expressed concern for the ability of low-income residents to afford the proposed price increases. Other respondents expressed concern for older and disabled people in being able to travel throughout the borough should vehicle ownership and use be restricted or made more expensive.</p>
Disability groups	<p>388 respondents (or 14%) of the consultation reported having one or more types of disability. Of those 388 people, 21% were over the age of 75, underscoring the intersectionality of disabled people and elderly people. Some of the concerns brought up were the ability to pay for these increased charges on pensions and limited budgets and underscored their need for a car/van as an elderly person with limited mobility.</p>
Motorcycle groups	<p>Three motorcycle interest groups responded to the consultation, including Save London Motorcycling, British Motorcyclists Federation and Motorcycle Action Group.</p> <p>There were an additional 491 consultation respondents who indicated that they owned or had access to a motorcycle.</p> <p>These groups and motorcycle owners expressed concern that charges would affect low-income motorcyclists.</p> <p>Respondents also commented that electric motorcycles (and motorcycles in general) take up less space than electric cars, are less heavy (contributing less to road safety danger and particulate matter) and take less energy to manufacture.</p> <p>A full discussion of motorcycle interest group responses and Officer responses to those is included in Appendix 4: Consultation Report.</p>
Religious groups	<p>Several respondents of the survey identified themselves as members of local synagogues. An email response was also received from a synagogue in the Borough, who expressed concern over the removal of scratch cards and how it would affect congregants' ability to attend services.</p>

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Emergency Services	The proposal was sent to the London Ambulance Service, NHS Blood and Transplant, London Fire Brigade, the MET, and British Transport Police as part of the consultation engagement activities.
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5 This could include our staff networks, advisory groups and local community groups, advice agencies and charities.

4.b. Where relevant, record any engagement you have had with other teams or directorates within the Council and/or with external partners or suppliers that you are working with to deliver this activity. This is essential where the mitigations for any potential negative impacts rely on the delivery of work by other teams.

As part of reviewing parking fees and charges and terms and conditions, the Parking Team liaised with Social Support, Finance, Legal, Equalities Teams. The Transport Strategy team have also liaised closely with the Inclusive Economy, Sustainability and Camden Accessible Transport Services teams throughout this project.

Step 5: Informed decision-making

5. Having assessed the potential positive and/or negative impact of the activity, what do you propose to do next?

Please select one of the options below and provide a rationale (for most EqlAs this will be box 1). Remember to review this and consider any additional evidence from the operation of the activity.

<p>1. Change the activity to mitigate potential negative impacts identified and/or to include additional positive impacts that can address disproportionality or otherwise promote equality or good relations.</p>	<p>The potential negative impacts that have been outlined both in this report, the consultation report and the main decision report, have been carefully considered. Upon reviewing the relevant data, policy contexts and in consideration of the points brought up in the consultation responses, several proposal changes/mitigations have been made following the consultation. These include the following revisions to the proposals that were originally consulted on (also see Appendix 9 for a table of these revisions and rationales):</p> <ul style="list-style-type: none"> • Implementation of the fees and charges over two years instead of one year. • Prices for electric motorcycles to be reduced lower than that of electric cars. • Scratch cards will be retained for Assisted Customers (customers registered by Contact Camden as digitally excluded). Those who are unable to access the online system for Visitor permits can also call Contact Camden to purchase permits. They can also nominate a person (who is more comfortable using an online system) to purchase digital
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	<p>permits for them. In addition, an Integrated Voice Recognition telephone service would be introduced to support customers who need out-of-hours access to telephone bookings. See the section above under “Age” for more details on how this IVR service would work.</p> <ul style="list-style-type: none"> • Doctor bays currently in place will be reviewed on a case-by-case basis to accommodate practices who need to keep their dedicated bays for essential operational reasons. For new applicants, dedicated parking bays for Doctors permits across the borough and for Business permits south of Euston Road will no longer be provided. • Maintaining any existing 4-hour maximum stay parking bays that fall within a 100-metre radius of hospitals. <p>The potential wider beneficial impacts of the activity, which include reduced motor vehicle dominance/congestion, reduced carbon emissions and improved air quality, and increased uptake of sustainable/healthy modes of travel, outweigh the potential negative impacts of the activity and move Camden closer to achieving its ambitious sustainable transport, climate change, air quality, road safety and public health policy objectives and its vision of creating a healthy place for people to work, live and visit.</p>
<p>2. Continue the work as it is because no potential negative impacts have been found</p>	
<p>3. Justify and continue the work despite negative impacts (please provide justification – this must be a proportionate means of achieving a legitimate aim)</p>	

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<p>4. Stop the work because discrimination is unjustifiable and there is no obvious way to mitigate the negative impact</p>	
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Step 6: Action planning

6. You must address any negative impacts identified in steps 3 and/or 4. Please demonstrate how you will do this or record any actions already taken to do this.

Please remember to add any positive actions you can take that further any potential or actual positive impacts identified in step 3 and 4.

Make sure you consult with or inform others who will need to deliver actions.

Action	Due	Owner
Communicated the proposed changes for parking fees and charges, including in non-digital forms, to ensure people without access to internet or smart phones would be informed about the changes. This was communicated as part of the public consultation which took place in October/November 2023.	October/ November 2023	Parking Team and Communications Team
If proposals are implemented, to monitor the objectives of the parking fees and charges to ensure the effectiveness of the changes. More details on monitoring, including specific metrics, can be found in Appendix 4. However, this would include metrics such as number of permit/parking product transactions by emissions bands, air quality throughout the borough and mode share, among others.	Ongoing	Parking Team and Transport Strategy Team
Ensured that relevant information on how disabled people in Camden can travel sustainably was easily accessible and disabled people are aware of the available options. This was part of Public Consultation undertaken in October/November 2023. All information on the support available was (and still is) also included on council's website.	October/ November 2023	Parking Team and Communications Team
Ensured that relevant information on how residents, businesses and visitors can travel sustainably in Camden was easily accessible. This included sharing information of public transport access, Car Clubs, bike share hires as well as ULEZ scrappage scheme and cycle courses. This information is currently available on council's website and was included in the Public Consultation undertaken in October/November 2023.	October/ November 2023	Parking Team and Communications Team

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To provide and communicate offers from the Council for discounted/free Car Club membership and free driving credits for low-income residents and small businesses.	January 2024	Parking Team and Communications Team
To provide relevant support for residents who used to use scratch-card type Visitor permits and are unable to access the online service for Visitor permits. Council support would be available via phone through Contact Camden. Additionally, an Integrated Voice Recognition telephone service would be introduced to support customers who need out-of-hours access to telephone bookings. Call volumes and complaints would be closely monitored to ensure no resident is impacted by the removal of scratch-card type Visitor permits. Note that Assisted Customers (those registered by Contact Camden as digitally excluded) would still be able to purchase scratch-card type Visitor Permits.	From April 2024	Parking Team
If approved for implementation, to implement and communicate that charge increases set out in Amendment A7 of the main report would be phased-in over the course of two years. To communicate all other post-consultation changes (see above and Appendix 9) and next steps in the process (e.g. statutory traffic orders) if a decision is made to proceed.	From April 2024	Parking Team and Transport Strategy

Step 7: EqIA Advisor

Ask a colleague, preferably in another team or directorate, to ‘sense check’ your approach to the EqIA and ask them to review the EqIA form before completing it.

They should be able to clearly understand from what you have recorded here the process you have undertaken to assess the equality impacts, what your analysis tells you about positive and negative actual or potential impact, and what decisions you have made and actions you have identified as a result.

They may make suggestions for evidence or impacts that you have not identified. If this happens, you should consider revising the EqIA form before completing this version and setting a date for its review.

If you feel you could benefit from further advice, please contact the Equalities service at

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equalities@camden.gov.uk

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Step 8: Sign-off

EqIA author	Name: Dominika Piotrowska Job title: Consultant Date: December 19, 2023
EqIA advisor / reviewer	Name Job title Date
Senior accountable officer	Name: Sam Margolis; Peter Mardell Job title: Head of Transport Strategy & Projects; Head of Parking Operations Date: December 15, 2023