EQUALITY IMPACT ASSESSMENT / EQUALITY ANALYSIS

POLICY/PROPOSAL:	Brent Active Travel, Healthy Neighbourhoods and School Streets
DEPARTMENT:	Regeneration and Environment
TEAM:	Project Development, Highways and Infrastructure
LEAD OFFICER:	Sandor Fazekas / Debbie Huckle
DATE:	**20 December 2021**

NB: Please ensure you have read the accompanying EA guidance and instructions in full.

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

This Equality Analysis has been prepared in consideration of the recommendations in the report to the Cabinet meeting of 17th January 2022 titled: Brent Active Travel – Healthy Neighbourhoods and School Streets. This Cabinet report considers the outcome of monitoring reports and engagement for 5 Healthy (Low Traffic) Neighbourhoods and 30 new School Streets introduced across the borough in 2020, using Transport for London Streetspace funding. The recommendations in the Cabinet report are to make permanent 26 School Street schemes which have been considered successful, and the introduction of ANPR CCTV cameras with exemptions. The recommendation for the 5 Healthy Neighbourhood schemes are that 4 are removed and 1 remains with one restriction removed, as the schemes are generally not supported with high numbers of residents opposing the trial schemes, and the benefits have not been realised. Also, that further engagement takes place considering suggestions / comments and that measures are identified that would provide benefits to the area and be supported by the community.

The Healthy Neighbourhood schemes were designed with strategically placed road restrictions or modal filters, which prevent through traffic but allow access, although the route may be slightly longer. The main principle is that while every resident will still be able to drive on their street, receive deliveries etc. the scheme prevents through traffic and encourages residents to choose to walk or cycle, particularly for short trips. The Brent schemes were designed to use planters and removable bollards with emergency access padlocks. There is signage in place indicating a prohibition for access by motor vehicles, along with CCTV enforcement signs to deter access. Although the intention was to install lockable bollards, these were removed and replaced with plastic barriers to ensure easy access for emergency vehicles, if needed. The schemes therefore rely on compliance with signage and, as they do not have CCTV enforcement cameras, the benefits have not been fully realised.

The School Streets schemes introduce temporary motor traffic restrictions on the roads outside the schools to prevent through traffic. The roads are closed during morning drop-off and afternoon pick-up times through the use of removable physical barriers. Access is

maintained for residents within the school street zone, blue badge holders, emergency vehicles, and all pedestrians and cyclists. All other vehicles are not allowed access during the operational period of the school street.

The Healthy Neighbourhood and School Street schemes aim to change the way in which people travel by reducing motor traffic on residential streets, creating safer, quieter, cleaner, healthier and more pleasant roads that encourage walking and cycling. They have proven to be successful in London and elsewhere in reducing through traffic and changing travel choice.

The School Streets also creates significantly more space for social distancing helping to reduce the spread of COVID-19 amongst children, parents and staff. Often at pick-up and drop-off, the area outside school gates can become very crowded.

The Active Travel programme provides the following benefits to meet the Council's Strategic objectives;

- Increased uptake of sustainable transport modes, particularly cycling and walking, but also public transport and car clubs
- Reduced conventional vehicular trips on the network, particularly at peak times
- Reduced Killed and Seriously Injured (KSI) incidents and slight accidents on Brent's roads
- Reduce the exposure of Brent residents to Particulate Matter (PM) and Nitrogen Dioxide (NO2) generated by the transport network

This programme also supports the following Council Strategies;

- Borough Plan 2021-2022
- Brent Long Term Transport Strategy 2015-2035 (to be revised 2022)
- Brent's Third Local Implementation Plan 2019-2041
- Brent Climate & Ecological Emergency Strategy 2021-2030
- Air Quality Action Plan 2017-2022 (to be revised in 2022)
- The programme also supports the emerging Brent Health and Wellbeing Board's Joint Health and Wellbeing Strategy

A review of all the Healthy Neighbourhood and School Street schemes was conducted based on consultation feedback from Healthy Neighbourhood public engagement meetings, air quality and travel survey data. This was to establish if the schemes have achieved their aims of:

- providing space for social distancing
- improving air quality
- encouraging active journeys
- reducing private vehicle use

The conclusions of the review and recommendations have determined the recommendations as to whether the Healthy Neighbourhood schemes, and each of the individual School Street schemes will be made permanent, amended, or removed.

There is also a recommendation that a further Cabinet report is prepared to set out the approach for the development of future schemes and a policy for the enforcement of restrictions using CCTV cameras, which will consider exemptions and equalities.

2. Who may be affected by this policy or proposal?

The Active Travel programme could affect all drivers that travel within these areas.

Healthy Neighbourhoods have restrictions which prohibit drivers from gaining direct access to the road network beyond these points, however, by using a slightly longer alternative route, vehicles can still gain access. They allow pedestrians and cyclists to pass through them unimpeded.

School Streets restrict access to a section of road outside the individual schools. These are managed by school staff using cones and/or barriers. Residents living within the zone, Blue Badge holders, deliveries and emergency service vehicles are exempt. As with the healthy neighbourhoods pedestrians and cyclists can access at all times.

Elderly and disabled people might be impacted by the School Street if they need to gain access should a member of school staff not be present, as they would need to move the cones/barriers themselves and may have mobility issues. Ensuring that staff are available or the introduction of ANPR CCTV cameras and exemptions would mitigate the potential impact.

Children and parents and carers will benefit from the School Street as they will have a safer, healthier and more pleasant environment in which to travel to school.

Overall, more vulnerable people, specifically those with health conditions or mobility limitations, will benefit from improved safety where vehicles are restricted access and the likelihood of road traffic collisions is reduced.

Those who are pregnant may be affected by the School Street if they drive and have to park further away and walk the final part of the journey to school, however the scheme will deliver benefits for this group of people e.g. improved air quality.

The improved ability to walk to school may also support more deprived families, in terms of making walking safe and thereby reducing potential car or public transport costs.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

The Active Travel programme is relevant to the council's public sector equality duty, as it involves removing vehicular access to specific roads for certain people during particular times.

There is a possibility that in doing so, the council may be discriminating against people with a protected characteristic or failing to advance equality of opportunity for those people. The council needs to be aware of and consider the effects of the programme on all persons with protected characteristics. There is a possibility that the School Streets may reduce accessibility for some disabled people, and councils have a duty to make reasonable

adjustments to remove any barriers that disabled people face, so the potential impact on those with disabilities has been analysed and considered in the action plan.

In its current form blue badge holders are exempt from the school streets restrictions and there are plans to replace the barriers / cones with ANPR CCTV enforcement cameras with exemptions, which will eliminate any difficulties some disabled drivers may be experiencing should they wish to access the road in the absence of a member of school staff.

For the Healthy Neighbourhood schemes, the introduction of ANPR CCTV enforcement cameras at some restrictions would ensure easy access for emergency vehicles, when needed, and could also provide exemptions for people with disabilities so that they would not need to take a more circuitous route to gain access to a street or area.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	Impact Positive	Impact Neutral/None	Impact Negative
Age	**X**		
Sex		**X**	
Race		**X**	
Disability		**X**	
Sexual orientation		**X**	
Gender reassignment		**X**	
Religion or belief		**X**	
Pregnancy or maternity		**X**	
Marriage		**X**	

5. Please complete **each row** of the checklist with an "X".

Screening Checklist

	YES	NO
Have you established that the policy or proposal *is* relevant to the council's public sector equality duty?	**X**	
Does the policy or proposal relate to an area with known inequalities?		**X**
Would the policy or proposal change or remove services used by vulnerable groups of people?	**X**	

Has the potential for negative or positive equality impacts been identified with this policy or proposal?	**X**	

If you have answered YES to ANY of the above, then proceed to section B.
If you have answered NO to ALL of the above, then proceed straight to section D.

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

Evidence was gathered using a broad range of engagement and information-gathering techniques, including:

- Public consultation
- Parent & guardian consultation
- Meetings with local residents
- Walkabouts
- Resident surveys
- Air quality data
- School interviews
- Travel mode data
- Site observations
- Comparison with other authorities
- Comparison with ward-level and borough-level demographic data
- Research on impact of similar proposals on people with protected characteristics

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE

Details of impacts identified	There will be no additional negative impact on older people. Some older people have mobility or other health issues which mean that they depend on car travel. The scheme ensures that all these people who live within the School Street zone can access their homes by car or taxi by allowing them to apply for a permit. The scheme also ensures that parents, grandparents or guardians with mobility or health issues with a blue badge are exempt from the scheme and can pick up their children easily and conveniently. As the schemes are confined to small areas, the additional journey time for car-reliant older people is minimal. Finally, emergency services can always access the closed roads and the barriers are manned so can be removed in seconds, which means there is no risk of increased response times for older people requiring assistance. Access will be

	improved in the future by the installation of ANPR CCTV cameras with exemptions. Older people with mobility, vision, hearing or health issues will be positively impacted by the schemes. By reducing motor traffic and thus creating more space for pedestrians, the schemes make it easier to cross the road safely or to use a wheelchair or mobility aid, as well as protecting them from exposure to air pollution and COVID-19. There will also be a positive impact on children, as improved road safety will reduce the chance of them being involved in a traffic collision and will make the journey to and from school more pleasant. The schemes will also make children more likely to walk, cycle or scoot to school, which will improve their physical and mental health. Healthy Neighbourhood schemes do not prohibit access to a street and alternative routes are available. Restricting through traffic in residential areas provides safety benefits, particularly for more vulnerable pedestrians, as well as improving air quality and encouraging walking and cycling and a healthier lifestyle.

DISABILITY

Details of impacts identified	The School Streets schemes maintain access for disabled residents and parents/guardians, which avoids any negative impact on accessibility. It is ensured that any signs or other obstacles connected to the schemes do not restrict accessibility on the pavement, and that the signage and street layout is clear. Healthy Neighbourhood schemes do not prohibit access to a street and alternative routes are available. A policy will be developed for CCTV camera enforcement for Active Travel schemes and consideration will be given to granting disabled people exemptions and direct access, as some may not be able to walk or cycle. Creating more space for walking and cycling and reducing traffic danger has a positive impact on disabled people. In a report by Transport for All (2021), 18% of disabled people reported that road closures decrease traffic danger, especially among deaf and visually impaired participants. This finding also emerged in the recent Joint Health and Wellbeing Strategy. Reducing the number of cars parked on the roadside ensures that dropped kerbs remain accessible for those using wheelchairs or mobility aids. Improving air quality has a positive impact on disabled people with breathing issues. Black taxis can be granted exemptions in the school streets exemption which will further benefit disabled residents and disabled parents/guardians. Transport for All (2021) found that only half of disabled people hold a Blue Badge and recommend that School Street schemes grant dispensation for disabled people by any vehicle they choose, including taxis.

RACE

Details of impacts identified	Research has shown that Black Londoners are more likely to be exposed to the harmful impacts of motor traffic, such as traffic collisions (Steinbach et al., 2008) and poor air quality (Vaughn, 2016), than other ethnic groups. By improving road safety and air quality, the active travel schemes will have a positive impact on this community. Black people are also the least likely out of all ethnic groups to have access to a car (National Travel Survey, 2009), so they will benefit from the increased space for walking, cycling and scooting. A report by the DfT (2020) found that 52% of taxi drivers are Asian and 37% are Asian and British. Taxi drivers may be slightly inconvenienced by the schemes, but as the schemes are restricted to local areas journey times are unlikely to be significantly increased. Therefore, the impact on Asian taxi drivers is likely to be low.

SEX

Details of impacts identified	Women are more likely to take on a care-providing role in the family, including dropping off and picking up their children. The 2014 National Travel Survey found that most of the people dropping children off at their school are women aged between 30 and 49. This finding was supported by consultations with parents and residents at Brent schools, where the majority of participants were women. For those women who usually drive their children to school, the schemes may inconvenience them, but for those mothers who walk or cycle their children to school, the schemes will have a positive impact, as they will likely feel that they and their children are safer and healthier as a result. Therefore, overall, the scheme will have a neutral impact on women.

SEXUAL ORIENTATION

Details of impacts identified	There is no evidence to suggest that the Healthy Neighbourhoods or School Streets schemes will have an impact on people with a particular sexual orientation.

PREGANCY AND MATERNITY

Details of impacts identified	Those who are pregnant are likely to have a greater reliance on the car and may be less able to walk a long distance. This may have a negative impact on those picking up their children, as they will need to park further away and walk further to get to the school. This could be mitigated by exempting those who are heavily pregnant from the schemes.

	On the other hand, those who are pregnant will be positively impacted by the reduction in air pollution, which has been shown to reduce fetal growth (BMJ, 2017). They will also benefit from increased space for social distancing, reducing their chances of catching COVID-19 and other viruses.

RELIGION OR BELIEF

Details of impacts identified	There are no places of worship within the School Street zones and visitors to places of worship within the Healthy Neighbourhoods might have to drive further they will benefit from reduced air pollution, a more pleasant street environment and improved road safety when entering and leaving the area where their place of worship is situated, generating a neutral impact.

GENDER REASSIGNMENT

Details of impacts identified	There is no evidence to suggest that the Healthy Neighbourhoods or School Streets schemes will have an impact on people with this characteristic.

MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	There is no evidence to suggest that the Healthy Neighbourhoods or School Streets schemes will have an impact on people of a particular marital status.

3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

Under the Equality Act 2010 the council is required to make adjustments where a physical feature puts a disabled person at a substantial disadvantage, by removing it, altering it or providing a reasonable means of avoiding it. Where a disabled person needs access to the School Street zone as a resident or parent/guardian, including when they are a passenger in a taxi, someone must operate the barrier or leave a sufficient gap for a vehicle to gain access. The introduction of ANPR CCTV cameras will eliminate this potential problem. To avoid the risk of being unlawful and to ensure accessibility for everyone, the school street exemptions must include people who are disabled but who do not hold a Blue Badge. Where a disabled person needs to travel by motor vehicle through the zone, there must be

reasonable alternative routes to avoid the street that is closed. The Healthy Neighbourhoods schemes would accommodate access, albeit through a more circuitous route. The introduction of CCTV cameras and potential exemptions would allow access.

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

The engagement activities were representative of the people who could be affected by the proposal.
Healthy Neighbourhood residents meetings where hosted by Living Streets which were impartial and inclusive, these were conducted both online and in person at local venues which were easily accessible. Residents were also able to leave comments on the Councils consultation portal during the trial, and equalities and diversity information collated would indicate that respondents are broadly representative of ward profiles.
MP Smarter Travel were contracted to work with the school community and they conducted interviews with the schools and arranged for questionnaires to be sent to parents to obtain their feedback.
Members of the RNIB was included in the consultation process, together with representatives from the Brent Disability Forum and Transport for All.

5. Please detail any areas identified as requiring further data or detailed analysis.

The sexuality data for each Brent ward was unavailable, so analysis of the representation of LGBTQ+ residents within the survey responses compared to ward demographics was not possible. This is something that could be analysed in future.

6. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

If the action plan is carried out, no significant negative impacts will remain.

7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

Further engagement for Healthy Neighbourhoods, further activities to be arranged and there would be a public consultation on any further measures.
Air quality data
Traffic surveys
Site observations
Regular meetings with school and pupil travel survey data.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

We do not expect a significant negative impact on any group with a protected characteristic for either the Healthy Neighbourhoods or School Streets schemes. The introduction of ANPR CCTV cameras and appropriate exemptions will help to mitigate any potential negative impact. As further engagement takes place for the Healthy Neighbourhoods schemes and plans are developed, we will closely monitor the potential impact and carry out Equalities screening as part of any future decisions to introduce new or amend existing schemes.

SECTION D – RESULT

Please select one of the following options. Mark with an "X".

A	**CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED**	**X**
B	**JUSTIFY AND CONTINUE THE POLICY/PROPOSAL**	
C	**CHANGE / ADJUST THE POLICY/PROPOSAL**	
D	**STOP OR ABANDON THE POLICY/PROPOSAL**	

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Introduce ANPR CCTV cameras to priority School Street schemes, including those where the school has difficulties staffing the	Easy access maintained for people with exemptions, such as disabled residents and parents/guardians	Debbie Huckle	October 2022

closures. ANPR CCTV will also be considered at some restrictions for future Healthy Neighbourhood schemes.			
Promote the availability of school street permits to all eligible residents. taxis or other visitors serving disabled residents, disabled parents/guardians, and staff of businesses/organisations	Easy access maintained for people with exemptions, such as disabled residents and parents/guardians	Debbie Huckle	October 2022
Ensure those with a disability who are exempt but do not hold a Blue Badge are easily permitted access to the school streets schemes	Easy access maintained for people with exemptions, such as disabled residents and parents/guardians	Debbie Huckle	October 2022
Monitor impacts of the Healthy Neighbourhood scheme going forward	Negative impacts will be identified, understood and reduced as far as possible	Sandor Fazekas	March 2023
Grant school streets exemptions to those who are pregnant, who rely heavily on cars and have difficulty walking a long distance	Easy access for all people with mobility issues	Debbie Huckle	October 2022
Ensure that any signs or other obstacles connected to the schemes do not restrict accessibility on the pavement, and that the signage and street layout is clear	Maximised accessibility for people with disabilities	Debbie Huckle	October 2022

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Debbie Huckle & Sandor Fazekas 05/01/2022
REVIEWING OFFICER:	Angela d'Urso 05/01/2022
HEAD OF SERVICE / Operational Director:	Tony Kennedy 05/01/2022