

# Full Equalities Analysis Assessment

## 1. Proposal Summary Information

EAA Title	Ealing Local Implementation Plan
Please describe your proposal?	The LIP is a statutory document prepared under Section 145 of the Greater London Authority (GLA) Act and sets out how the borough proposes to deliver the Mayor's Transport Strategy (MTS) in its area, as well as contributing to other local and sub-regional goals. It has been developed in accordance with the Revised Guidance for Borough Officers on Developing the Third Local Implementation Plan
Is it HR Related?	No
Corporate Purpose	Transport policy, funding, delivery and performance management document

### 1. What is the Project/Scheme looking to achieve? Who will be affected?

The Local Implementation Plan (LIP) sets out Ealing's contribution and context for delivering the London Mayor's Transport Strategy (MTS). The LIP covers several objectives, based on MTS goals, challenges and outcomes, the West London Sub Regional Transport Plan, the Community Strategy and the Local Development Framework.

The LIP along with Ealing's Transport Strategy set out long term goals and transport objectives for the London Borough of Ealing for the next 20 years, a three-year programme of investment starting in 2019/20, and includes delivery proposals for period 2019/20 – 2021/22 and the targets and outcomes the borough is looking to achieve.

The Transport Strategy and LIP Vision is:

'Within the context of good growth, to improve streets and transport infrastructure to reduce dependency on cars to prioritise active, efficient and sustainable travel modes, making Ealing a healthier, cleaner, safer and more accessible place for all'.

The Transport Strategy and LIP have three core objectives which are as follows:

- 1. Mode Shift to more sustainable travel**
- 2. Reducing the Environmental Footprint of Transport**
- 3. Improving Road Safety**

These three objectives are underpinned by four main transport principles:

- A. Improve health and well-being**
- B. Improve the Borough's air quality, and other environmental enhancements**
- C. Provide a more efficient and safe transport network**
- D. Support good growth, and enhance the vibrancy and robustness of the Borough's economy**

- **Policy Goal 1:** To increase active travel modes within the Borough through improved infrastructure for walking and cycling and behavioural change activities.
- **Outcomes:** Reduced air pollutant emissions from ground-based transport; Increase in active travel; Increase in health levels; facilitating an increase in walking and cycling.

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- **Policy Goal 2:** To make the Borough accessible to those with a mobility impairment and reducing severance by removing the barriers to movement.
- **Outcomes:** Improving the physical accessibility of the transport system; improving access to services.
  
- **Policy Goal 3:** To reduce and mitigate against the Borough's contribution to traffic-based air pollutants.
- **Outcomes:** Reducing CO2 emissions from ground-based transport.
  
- **Policy Goal 4:** To implement SuDS schemes to reduce flooding on the Highway and mitigate against transport-based pollutants getting to the Borough's water bodies.
- **Outcomes:** Enhancing streetscapes; protecting and enhancing the natural environment and protecting the health of residents.
  
- **Policy Goal 5:** To reduce and mitigate against transport-based noise pollution.
- **Outcomes:** Improving perceptions and reducing impacts of noise.
  
- **Policy Goal 6:** To reduce traffic congestion on Borough Roads through the increase of active travel modes.
- **Outcomes:** Smoothing traffic flow; improving public transport reliability; improving road user satisfaction (drivers, pedestrians, cyclists); facilitating an increase in walking and cycling.
  
- **Policy Goal 7:** To lobby public transport operators to achieve a frequent, reliable, safe and affordable public transport system which links people to all key destinations and services.
- **Outcomes:** Improving public transport reliability and reduce operating costs; bringing and maintaining all assets to a state of good repair; improving public transport customer satisfaction; improving access to jobs.
  
- **Policy Goal 8:** To make the Borough's roads safe for all road users, with priority on infrastructure and behaviour change to promote walking and cycling.
- **Outcomes:** Better road safety awareness; reducing the numbers of road traffic casualties.
  
- **Policy Goal 9:** To design the Borough's streets for people not for vehicles to encourage active travel and benefit local economies.
- **Outcomes:** Enhancing streetscapes, improving the perception of the urban realm and developing 'better streets' initiatives; facilitating an increase in walking and cycling; supporting the needs of business to grow; improving road user satisfaction.

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## 2. What will the impact of your proposal be?

The policy will impact all those who live, work or travel through the borough since the entire transport network is covered by the MTS.

## 2. Impact on Groups having a Protected Characteristic

**AGE:** *A person of a particular age or being within an age group.*

**Impact: Positive**

### Describe the Impact

The overall population of Ealing has risen from around 343,000 in 2015 to 352,000 in 2018. Ealing's proportion of children (0-15 years) is around 21% whilst the proportion of older people (65 and over) is 12%. Transport affects people from different age groups in different ways.

Older and younger people are more vulnerable to collisions. Commitments within the LIP to improve road safety will therefore benefit both groups. Specifically, making public transport more accessible for the elderly and the ongoing rollout of road safety measures around schools will have a positive impact.

Overall objectives in the MTS, such as the Healthy Streets approach, will contribute to better street design focused on prioritising and protecting vulnerable groups.

The elderly may have reduced walking ranges limiting their ability to cover longer distances on foot or using public transport due to varying accessibility levels or poor connectivity. As a result, elderly people may ultimately rely more on private motor vehicles for their own transport needs. Subsequently, proposals that limit provision for cars without accompanying public transport improvements could have a negative impact on this group. The LIP3 outlines the need for public transport to serve the needs of all users by making public realm improvements at transport interchanges as per the Healthy Streets principles.

Younger people are reliant on public transport; cost and parents' perception of safety—in terms of personal safety and being involved in an accident when travelling unsupervised—play heavily into its use.

The cost of public transport will need to be affordable whilst remaining reliable and providing young passengers with a good transport experience. Like the elderly, all children under 16 can benefit from free travel on the London bus network through using an Oyster Card. Cost is therefore not a barrier to accessing public transport.

**Alternatives and mitigating actions which have been considered in order to reduce negative effect:**

### Describe the Mitigating Action

- Working directly with Transport for London (TfL) to improve station accessibility e.g. step-free access at stations
- 100% bus stop accessibility has already been achieved; ensuring that these continue to meet accessibility guidelines.
- Improving street accessibility through the installation of dropped kerbs and tactile paving where needed.

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- Continue 20mph coverage or other speed reduction strategies in high streets and residential areas, or where there are reports of high speeds or hostile driving.
- Improving bus reliability and journey times will benefit all users.
- Continue the support of the TfL Sustainable Travel: Active, Responsible, Safe (STARS) programme; more pupils will participate in regular physical activity through walking and cycling.
- Ensuring that everyone cycling to school, the high street, community centre or library can park their bikes securely.

**DISABILITY:** *A person has a disability if s/he has a physical or mental impairment which has a substantial and long term adverse effect on their ability to carry out normal day to day activities<sup>1</sup>.*

**Impact: Positive**

### Describe the Impact

One in six people in the UK have a disability. The LIP and the MTS emphasise the need for improving public transport accessibility, the physical environment and removing barriers to key services.

People with disabilities are generally less likely to drive. However, their use of public transport can be reduced as a result of having an impairment or hidden disability.

It is possible that people may experience harassment as well as other aggressive and threatening behaviour whilst using public transport. This can effectively act as a barrier to using public transport, which would directly impact access to employment opportunities and key services.

Access to public transport can be improved by following good street design practice and through the continued maintenance of assets. This means designing for a better street environment by implementing dropped kerbs, tactile paving, handrails, clear street signage and level footways where needed. The LIP's objectives and targets on the accessibility of the transport network will create great opportunities to access key services and participation in public life.

Information about transport needs to be communicated to disabled people effectively. Passenger information must be communicated in different channels e.g. braille, audio-visual announcements. Good street lighting at transport interchanges must be provided for visually impaired users to read timetables and signs.

Some people with disabilities may rely more on private cars for their transport needs. They are usually blue badge parking permit holders and make use of reserved parking spaces. Proposals within the LIP which reduce provision for cars without improvements in parallel to public transport accessibility is likely to have a negative impact on these users. However, Freedom Passes are provided to users who are registered disabled, thereby addressing the affordability issue of public transport, along with continued commitments in the LIP to improve public transport accessibility.

The installation of electric vehicle charge points (EVCPs) can obstruct access to footways especially in locations where the pavement is already narrow. People with a mobility impairment and wheelchair users could find it challenging to navigate on top of pre-existing street furniture. EVCPs must be installed by following industry best practice and TfL Streetscape guidance.

<sup>1</sup> Due regard to meeting the needs of people with disabilities involves taking steps to take account of their disabilities and may involve making reasonable adjustments and prioritizing certain groups of disabled people on the basis that they are particularly affected by the proposal.

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Access to local services, such as hospitals and GPs surgeries, is crucial. The reduction of provision for cars without relevant transport accessibility improvements could bring negative impacts. The LIP and MTS prioritises the removal of physical barriers to improve access to services, as well as overall transport hub access.

The LIP aims to address these issues – particularly Objective 2 which relates to making the Borough accessible to those with a mobility impairment and reducing severance by removing the barriers to movement.

**Alternatives and mitigating actions which have been considered in order to reduce negative effect:**

### **Describe the Mitigating Action**

- Retention of disabled (Blue Badge) parking bays.
- Industry best practice and TfL Streetscape will be followed to avoid the installation of assets that could cause accessibility barriers.
- Improving street accessibility through the installation of dropped kerbs and tactile paving where needed.
- 100% bus stop accessibility has already been achieved; ensuring that these continue to meet accessibility guidelines.
- Working directly with Transport for London (TfL) to improve station accessibility e.g. step-free access at stations
- Continue 20mph coverage or other speed reduction strategies in high streets and residential areas, or where there are reports of high speeds or hostile driving.
- Electric vehicle charge points: ensuring comfortable footway (pavement) circulation for pedestrians is essential. Council Officers and EV charge point suppliers, the team attempt to identify sites whereby once the charge point infrastructure is installed, there is minimal obstruction to pedestrians of all abilities and there is sufficient width of at least 1.2 metres for parents with push chairs, plus wheelchair and mobility scooter users to continue using the footway (pavement).
- 'People feel safe' is a key principle of the Healthy Street approach. By embedding this principle in the public realm design process, safety at specific locations will be improved.
- Some elements of the LIP in partnership with TfL, Metropolitan Police, Network Rail and train operators will address the above issues. Overall, TfL's programme to improve safety on the transport network will benefit all users who may feel unsafe.

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<b>GENDER REASSIGNMENT:</b> <i>This is the process of transitioning from one sex to another. This includes persons who consider themselves to be trans, transgender and transsexual.</i>
<b>Impacts: Neutral</b>
<b>Describe the Impact</b>
<p>There is no evidence of anticipated impacts on persons that had undergone or were undergoing gender reassignment for changes to the transport network.</p> <p>However, it is possible that people may experience harassment as well as other aggressive and threatening behaviour whilst using public transport.</p>
<b>Alternatives and mitigating actions which have been considered in order to reduce negative effect:</b>
<b>Describe the Mitigating Action</b>
<ul style="list-style-type: none"><li>• 'People feel safe' is a key principle of the Healthy Street approach. By embedding this principle in the public realm design process, safety at specific locations will be improved.</li><li>• Some elements of the LIP in partnership with TfL, Metropolitan Police, Network Rail and train operators will address the above issues. Overall, TfL's programme to improve safety on the transport network will benefit all users who may feel unsafe.</li></ul>

<b>RACE:</b> <i>A group of people defined by their colour, nationality (including citizenship), ethnic or national origins or race.</i>
<b>Impacts: Neutral</b>
<b>Describe the Impact</b>
<p>Overall, the different racial backgrounds of people were not considered to be disproportionately impacted by the proposals in the LIP.</p> <p>However, it is possible that people from all ethnic communities may experience harassment as well as racist attacks and threatening behaviour whilst using public transport and be concerned for their own personal safety whilst both on the transport network and in the public realm.</p> <p>This can effectively act as a barrier to using public transport, which would directly impact access to employment opportunities and key services. Language can also act as a barrier to accessing travel information.</p> <p>Some of these issues can be resolved by providing better signage, better street lighting, the installation of CCTV, increased staffing. This will require working in partnership with TfL, London Buses, Network Rail and train operators.</p> <p>The LIP aims to address some of these issues, particularly through Objective 7 and Objective 9 which relate to the provision of a safe public transport system and to design the Borough's streets to the benefit of local economies.</p>
<b>Alternatives and mitigating actions which have been considered in order to reduce negative effect:</b>
<b>Describe the Mitigating Action</b>
<ul style="list-style-type: none"><li>• 'People feel safe' is a key principle of the Healthy Street approach. By embedding this principle in the public realm design process, safety at specific locations will be improved.</li></ul>

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- Some elements of the LIP in partnership with TfL, Metropolitan Police, Network Rail and train operators will address the above issues. Overall, TfL's programme to improve safety on the transport network will benefit all users who may feel unsafe.

**RELIGION & BELIEF:** *Religion means any religion. Belief includes religious and philosophical beliefs including lack of belief (for example, Atheism). Generally, a belief should affect a person's life choices or the way you live for it to be included.*

**Impacts: Positive**

**Describe the Impact**

Overall, the different religious beliefs of people were not considered to be disproportionately impacted by the proposals in the LIP.

However, this user group might find access to some faith sites difficult.

It is possible that members of different faith groups may experience harassment as well as aggressive and threatening behaviour whilst using public transport and be concerned for their own personal safety whilst both on the transport network and in the public realm.

Some of these issues can be resolved by providing better street lighting, the installation of CCTV, increased staffing. This will require working in partnership with TfL, London Buses, Network Rail and train operators.

**Alternatives and mitigating actions which have been considered in order to reduce negative effect:**

**Describe the Mitigating Action**

- 'People feel safe' is a key principle of the Healthy Street approach. By embedding this principle in the public realm design process, safety at specific locations will be improved.
- Some elements of the LIP in partnership with TfL, Metropolitan Police, Network Rail and train operators will address the above issues. Overall, TfL's programme to improve safety on the transport network will benefit all users who may feel unsafe.

**SEX:** *Someone being a man or a woman.*

**Impact: Neutral**

**Describe the Impact**

Overall, sex was not considered to be disproportionately impacted by the proposals in the LIP.

However, it is possible that people may experience harassment as well as other aggressive and threatening behaviour whilst using public transport.

Some of these issues can be resolved by providing better street lighting, the installation of CCTV, increased staffing. This will require working in partnership with TfL, London Buses, Network Rail and train operators.

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**Alternatives and mitigating actions which have been considered in order to reduce negative effect:**

**Describe the Mitigating Action**

- 'People feel safe' is a key principle of the Healthy Street approach. By embedding this principle in the public realm design process, safety at specific locations will be improved.
- Some elements of the LIP in partnership with TfL, Metropolitan Police, Network Rail and train operators will address the above issues. Overall, TfL's programme to improve safety on the transport network will benefit all users who may feel unsafe.



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<b>SEXUAL ORIENTATION:</b> <i>A person's sexual attraction towards his or her own sex, the opposite sex or to both sexes.</i>
<b>Impacts: Neutral</b>
<b>Describe the Impact</b>
<p>Overall, sexual orientation was not considered to be disproportionately impacted by the proposals in the LIP.</p> <p>However, it is possible that people may experience harassment as well as other aggressive and threatening behaviour whilst using public transport.</p> <p>Some of these issues can be resolved by providing better street lighting, the installation of CCTV, increased staffing. This will require working in partnership with TfL, London Buses, Network Rail and train operators.</p>
<b>Alternatives and mitigating actions which have been considered in order to reduce negative effect:</b>
<b>Describe the Mitigating Action</b>
<ul style="list-style-type: none"> <li>• 'People feel safe' is a key principle of the Healthy Street approach. By embedding this principle in the public realm design process, safety at specific locations will be improved.</li> <li>• Some elements of the LIP in partnership with TfL, Metropolitan Police, Network Rail and train operators will address the above issues. Overall, TfL's programme to improve safety on the transport network will benefit all users who may feel unsafe.</li> </ul>

<b>PREGNANCY &amp; MATERNITY:</b> <i>Description: Pregnancy: Being pregnant. Maternity: The period after giving birth - linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, including as a result of breastfeeding.</i>
<b>Impacts: Positive</b>
<b>Describe the Impact</b>
<p>Pregnant women or parents with children travelling in buggies may find it more difficult to use the transport network. Problems relate to accessing services (particularly affected by a poor urban environment), boarding and alighting public transport with buggies and wheelchairs, as well as the high cost of taxi travel. Safety and reliability are also concerns.</p> <p>This group will benefit from public transport accessibility and connectivity improvements.</p> <p>The transport network accessibility proposals in the LIP will positively impact this user group.</p> <p>The LIP aims to address these issues – particularly Objective 2 and Objective 7 which relate to making the borough accessible and ensuring that the network is safe and reliable.</p>
<b>Alternatives and mitigating actions which have been considered in order to reduce negative effect:</b>
<b>Describe the Mitigating Action</b>
<ul style="list-style-type: none"> <li>• Industry best practice and TfL Streetscape will be followed to avoid the installation of assets that could cause accessibility barriers.</li> <li>• Improving street accessibility through the installation of dropped kerbs and tactile paving where needed.</li> </ul>

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- 100% bus stop accessibility has already been achieved; ensuring that these continue to meet accessibility guidelines.
- Working directly with Transport for London (TfL) to improve station accessibility e.g. step-free access at stations

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<b>MARRIAGE &amp; CIVIL PARTNERSHIP:</b> <i>Marriage: A union between a man and a woman. or of the same sex, which is legally recognised in the UK as a marriage</i> <i>Civil partnership: Civil partners must be treated the same as married couples on a range of legal matters.</i>
<b>Impacts: Neutral</b>
<b>Describe the Impact</b>
Overall, marriage and civil partnership was not considered to be disproportionately impacted by the proposals in the LIP.
<b>Alternatives and mitigating actions which have been considered in order to reduce negative effect:</b>
<b>Describe the Mitigating Action</b>
<ul style="list-style-type: none"><li>The LIP does not directly address the above issues. Specific mitigating actions have not been developed in response.</li></ul>

<b>3. Human Rights<sup>2</sup></b>
<b>4a. Does your proposal impact on Human Rights as defined by the Human Rights Act 1998?</b>
No
<b>4b. Does your proposal impact on the rights of children as defined by the UN Convention on the Rights of the Child?</b>
No
<b>4c. Does your proposal impact on the rights of persons with disabilities as defined by the UN Convention on the rights of persons with disabilities?</b>
No
<i>(If yes, please describe the effect and any mitigating action you have considered.)</i>

<sup>2</sup> For further guidance please refer to the Human Rights & URNC Guidance on the Council Equalities [web page](#).

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## 4. Conclusion

The groups with the following protected characteristics are expected to be affected by the proposals in the LIP:

- Disability
- Age
- Religion & Belief
- Pregnancy & Maternity

There is no evidence of anticipated impacts on groups with the following protected characteristics of the LIP.

- Sex
- Sexual Orientation
- Gender Reassignment
- Marriage & Civil Partnership
- Race

The Council will utilise extensive consultation and publicity of the available

**4a. What evidence, data sources and intelligence did you use to assess the potential impact/effect of your proposal? Please note the systems/processes you used to collect the data that has helped inform your proposal. Please list the file paths and/or relevant web links to the information you have described.**

Sources:

Office for Disability Issues (2014), Disability facts and figures

GLA, SHLAA (2018)

TfL (2015), Streetscape Guidance

TfL (2017), Electric vehicle charging infrastructure: location guidance for London

**5. Action Planning: (What are the next steps for the proposal please list i.e. what it comes into effect, when migrating actions<sup>3</sup> will take place, how you will measure impact etc.)**

Action	Outcomes	Success Measures	Timescales/ Milestones	Lead Officer
Stakeholder and public consultation	Document circulated to key stakeholders. Proposals publicised on Council website and details provided by email	Input from stakeholders	November 2018	Russell Roberts

<sup>3</sup> Linked to the protected characteristics above

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	and letter to stakeholders			
Cabinet Approval	Report submitted to Council Cabinet Meeting	Formal approval from the Council Cabinet	February 2019	Russell Roberts
Mayoral approval of final version of LIPs	LIP document submitted to TfL	Formal approval from the Mayor and TfL	March 2019	Russell Roberts
<b>Additional Comments:</b> Not applicable				

### 6. Sign off: (All EAA's must be signed off once completed)

Completing Officer Sign Off:	Service Director Sign Off:	<i>HR related proposal (Signed off by directorate HR officer)</i>
Signed: <i>R. Roberts</i>	Signed: <i>Lucy Taylor</i>	Not Applicable
Name (Block Capitals):	Name (Block Capitals):	
RUSSELL ROBERTS	LUCY TAYLOR	
Date: 31/01/19	Date:31/01/19	
For EA's relating to Cabinet decisions: received by Committee Section for publication by (date):		

### Appendix 1: Legal obligations under Section 149 of the Equality Act 2010:

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- As a public authority we must have due regard to the need to:
  - a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
  - b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
  - c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- The protected characteristics are: AGE, DISABILITY, GENDER REASSIGNMENT, RACE, RELIGION & BELIEF, SEX, SEXUAL ORIENTATION, PREGNANCY & MATERNITY, MARRIAGE & CIVIL PARTNERSHIP
- Having due regard to advancing equality of opportunity between those who share a protected characteristic and those who do not, involves considering the need to:
  - a) Remove or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
  - b) Take steps to meet the needs of persons who share a relevant characteristic that are different from the needs of the persons who do not share it.
  - c) Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- Having due regard to fostering good relations between persons who share a relevant protected characteristic and persons who do not, involves showing that you are tackling prejudice and promoting understanding.
- Complying with the duties may involve treating some people more favourably than others; but this should not be taken as permitting conduct that would be otherwise prohibited under the Act.