

<b>Equality Impact Assessment Report</b>	
<b>Date</b>	<b>04/10/2019</b>
<b>Sign-off path for EIA</b>	<b>Corporate EIA Panel Cabinet</b>
<b>Title of Project, business area, policy/strategy</b>	<b>Lambeth Transport Strategy &amp; Implementation Plan</b>

<h1>London Borough of Lambeth Full Equality Impact Assessment Report</h1>	
<h2>1.0 Introduction</h2>	
<h3>1.1 Business activity aims and intentions</h3>	<p>Lambeth’s Transport Strategy sets out our vision for accessibility and mobility in the borough over the next 20 years. The associated Transport Strategy Implementation Plan (TSIP) maps out a process showing how we will deliver that vision. The Transport Strategy is a sister document to the council’s Local Implementation Plan (LIP) required under the GLA Act 1999. The Transport Strategy is aimed at a general audience as well as key stakeholders. The Transport Strategy and TSIP define the scope and priority of our interventions to improve transport in the borough. Priority actions identified incorporate manifesto commitments relating to transport as well as wider policy objectives. The expected outcome of the Strategy and TSIP is to shape the way the transport network develops in order to support growth, reduce inequality, make the best use of available resources, improve public health and reduce carbon emissions. The Transport Strategy &amp; TSIP complement the Mayor of London’s Transport Strategy for which an Integrated Impact Assessment has been carried out<sup>1</sup>.</p> <p>The Transport Strategy &amp; TSIP represent the council’s first comprehensive strategy for transport improvements in recent times. There is no statutory requirement for London boroughs to produce such a wide ranging strategy, the regulatory aspect being covered by the council’s Local Implementation Plan which was adopted by the council in April 2019<sup>2</sup> and which can be seen as a subset of this Strategy.</p> <p>It is intended that the Transport Strategy &amp; TSIP will encapsulate and provide a focus for all of the council’s and its partner’s activities relating to transport and travel in Lambeth and beyond. In particular the TSIP will enable the council’s stakeholders to gain a better understanding of our strategies for delivering our high level objectives and in doing so encourage greater and broader participation in the development and delivery of related projects.</p>

<sup>1</sup> <http://content.tfl.gov.uk/integrated-impact-assessment-report.pdf>

<sup>2</sup> [Lambeth LIP 3](#)

	<p>Lambeth is a walking, cycling and public transport borough. The vast majority of trips are already made in these ways and most households do not own a car. The Strategy &amp; TSIP seek to continue on this path and deliver policy outcomes that:</p> <ul style="list-style-type: none"><li>a) accommodate expected population growth;</li><li>b) make access to transport services fair and equal;</li><li>c) prioritise walking, cycling, buses and shared transport services on our streets;</li><li>d) enable people to lead healthier lives, and</li><li>e) Reduce carbon emissions and improve air quality</li></ul> <p>The Strategy identifies a number of challenges to overcome to deliver the desired outcomes. These include:</p> <ul style="list-style-type: none"><li>a) Supporting growth without increasing traffic;</li><li>b) Delivering step free access to stations and fully accessible streets;</li><li>c) Reducing reliance on private cars;</li><li>d) Improving air quality and enabling people to incorporate physical activity into their daily lives, and,</li><li>e) Working with the community to change patterns of travel behaviour to reduce carbon emissions</li></ul> <p>Evidence suggests<sup>3</sup> the following key transport issues affecting different groups with protected characteristics:</p> <ul style="list-style-type: none"><li>• Older and disabled people use public transport less than other groups</li></ul>
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<sup>3</sup> On the Right Track: Action on Equality, Transport for London [On the Right Track](#)

	<ul style="list-style-type: none"><li>• Overcrowding is cited by all groups as a barrier BAME, older, women, younger, disabled, low income and LGB Londoner’s all advised this impacted significantly on their journey or in choosing a mode of transport</li><li>• Walking is the top mode of transport used by all groups followed by using a bus and then car either as a driver or passenger</li><li>• Women, older, disabled and BAME people less likely to walk or cycle</li><li>• Children, older and BAME people are more likely to be road traffic casualties</li><li>• Children, older people, and people with some health issues are particularly vulnerable to air pollution</li><li>• Older and disabled people, are not confident about being able to cross safely at pedestrian crossings</li></ul> <p>Priority actions identified in the Strategy relating to groups with protected characteristics include:</p> <ul style="list-style-type: none"><li>• We will support the Mayor of London in lobbying for rail devolution while working with industry stakeholders to deliver service enhancements.</li><li>• We will publish streetscape design guidance setting out how we will design our streets and public realm with an emphasis on inclusive access.</li><li>• We will proactively develop designs to deliver step free access at key stations and work with industry stakeholders to promote these.</li><li>• We will prioritise car parking for disabled people, recognising the critical role cars will continue to play to enable mobility for people for whom walking, cycling or public transport are not available options.</li><li>• We will create and deliver innovative schemes and training programmes to promote walking and cycling for the whole community and reach out to disadvantaged groups.</li><li>• We will identify and deliver measures to improve access to walking and cycling for our residents on housing estates.</li></ul>
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	<ul style="list-style-type: none"> <li>• We will work with the Mayor, TfL and other boroughs to investigate options to reduce traffic passing through Lambeth.</li> <li>• We will improve air quality and create more attractive places by greening our streets.</li> <li>• We will enable walking and cycling to school, particularly where car use is high, to reduce traffic, tackle health issues and improve air quality.</li> <li>• We will work with TfL, local police and communities to reduce the risk to young people and adults of violence on our transport network</li> <li>• We will reduce road danger and KSIs (Killed and Seriously Injured) through targeted infrastructure improvements and work with the Police on enforcement campaigns.</li> </ul>
<p><b>2.0 Analysing your equalities evidence</b></p>	
<p><b>Protected characteristics and local equality characteristics</b></p>	<p><b>Impact analysis</b>  <b>For each characteristic please indicate the type of impact (i.e. positive, negative, positive and negative, none, or unknown), and:</b></p>
<p><b>Race</b></p>	<p>Positive</p> <p>The implementation of the Transport Strategy &amp; TSIP is expected to increase participation among under-represented groups, for example the proportion of BAME groups who choose to cycle<sup>4</sup>. BAME groups are over-represented in indices of deprivation and more likely to be exposed to transport related harmful impacts, such as traffic collisions<sup>5</sup> and poor air quality<sup>6</sup> and health inequalities related to inactive lifestyles which the Strategy seeks to address. Priority actions included in the Strategy include targeted educational and training initiatives to promote active travel among under-represented groups,</p>

<sup>4</sup> Lambeth Existing Baseline Report 2016 shows areas north east of Brixton have low cycle to work levels. These areas generally have low incomes and high ethnic minority population.

<sup>5</sup> Steinbach R, Edwards P, Green J, and Grundy C (2007) Road Safety of London’s Black and Asian Minority Ethnic Groups: A report to the London Road Safety Unit.

<sup>6</sup> Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006

	including BAME groups. The engagement strategies identified in the TSIP are also expected to lead to a better representation of BAME groups in the decision making process, for example in the approach to community involvement adopted for the Brixton Liveable Neighbourhood project.
<b>Gender</b>	<p>Positive</p> <p>The implementation of the Transport Strategy &amp; TSIP is expected to increase participation among under-represented groups, for example the proportion of women who choose to cycle<sup>7</sup> and improving physical access to the public transport network for parents / carers for whom step free access may be particularly important (and who may be more likely to be women). Priority actions included in the Strategy include targeted educational and training initiatives to promote active travel among under-represented groups, including women. In particular, the TSIP sets out plans for a Healthy Route Network that will improve walking and cycling links across the borough. This network is intended to deliver quality conditions that will encourage under-represented groups, including women, to cycle.</p>
<b>Gender re-assignment</b>	None
<b>Disability</b>	<p>Positive</p> <p>Improving physical accessibility and removing barriers to people with disabilities is a key theme of the Strategy and TSIP. There is a significant journey time ‘penalty’ at present for those relying on rail and underground services who need step free access<sup>8</sup>. This is considered likely to be a deterrent to travel with the resulting impact of a narrowing of opportunity for economic and social activity with potential consequences for physical and mental well-being. The Strategy includes promoting step free access at Lambeth stations and delivering large and small scale highway improvements to provide safe, welcoming</p>

<sup>7</sup> Attitudes towards cycling September 2016 report TfL number: 05110

<sup>8</sup> Mayor’s Transport Strategy 2018, figure 21: difference in journey times using the step-free and full network

	<p>and legible street environments for people with disabilities. Increased priority for pedestrians, including extended crossing time, will also benefit people who may need more time to cross the road comfortably<sup>9</sup>. The Strategy also includes targeted services and campaigns to increase participation in sustainable travel by people with disabilities, including bus ridership and inclusive cycling initiatives. This is a particular priority as disabled people may suffer from higher mortality rates than the general population, potentially reflecting exclusion from active travel / lifestyles<sup>10</sup>. The updated strategy reinforces the need to prioritise car parking for people with disabilities and provide kerbside space for this purpose. The engagement strategies identified in the TSIP are also expected to lead to a better representation of people with disabilities in the decision making process.</p>
<p><b>Age</b></p>	<p>Positive and negative</p> <p>The Strategy includes targeted services and campaigns to increase participation in sustainable travel by younger and older people. For example, there is a focus on enabling more children to travel actively on the journey to school and a focus on enabling more older people to take up cycling. Although many children travel actively to school, a significant minority are still driven, particularly in the south of Lambeth<sup>11</sup> and the Strategy and TSIP seek to enable more of these trips to be walked or cycled, through the provision of ‘school streets’ for example. Improvements to air quality are also expected to be particularly beneficial to children<sup>12</sup> and those with underlying health issues, including older people. Children driven to primary school are exposed to higher levels of harmful particulates and NOx pollution inside vehicles, so measure to promote walking and cycling to school will be beneficial to this group.</p>

<sup>9</sup> Most older pedestrians are unable to cross the road in time: a cross sectional study, Asher L, Age and Ageing, Volume 41, Issue 5, 1 September 2012, Pages 690–694

<sup>10</sup> Primary and secondary barriers to physically active healthy lifestyles for adults with learning difficulties, Messent, Cook, Long, Disability and Rehabilitation, 2009

<sup>11</sup> Lambeth Existing Baseline Report 2016, Table 3.1., Page 29.

<sup>12</sup> Global Action Plan, 2018

	<p>Policies to reduce the level of violence particularly affecting younger people and related to travel across the borough are also expected to be beneficial. A reduction in crime and anti-social behaviour is also expected to be particularly beneficial to older people who may be otherwise deterred by this. Further iterations of the TSIP, including the development of a Public Realm Design Guide, will develop this topic further.</p> <p>Increased pedestrian crossing times are expected to benefit older people who may find current timings inadequate<sup>13</sup>.</p> <p>A key element of the Strategy is to reduce the use of private cars and re-purpose the kerbside to provide for other uses, such as cycle parking. As older people are more likely to be car owners there may be a slight negative impact on this group<sup>14</sup>. This is expected to be outweighed by broad health and accessibility benefits delivered by the Strategy. Specific mitigation includes a renewed emphasis on prioritising car parking for Blue Badge holders, increasing the availability of car club services and improving the quality of public transport services.</p>
<b>Sexual orientation</b>	<p>Positive</p> <p>In the Strategy we commit to working with TfL, local police and communities to reduce the risk to young people and adults of violence on our transport network.</p> <p>A reduction in crime and anti-social behaviour associated with travel, including hate crime, is expected to be particularly beneficial to groups who may be more vulnerable to this risk.</p>
<b>Religion and belief</b>	None

<sup>13</sup> Ibid

<sup>14</sup> Roads Task Force Technical Note 12, Transport for London.



<p><b>Pregnancy and maternity</b></p>	<p>Positive</p> <p>Improving physical access to public transport and the public realm generally is expected to have a positive impact for this group as it will improve accessibility and create more welcoming places e.g. by delivering step free access to stations. Improvements to air quality are also expected to have a positive impact<sup>15</sup>, particularly in relation to the health of unborn children for whom exposure to poor air quality has been identified as a particular issue. The implementation of more ‘people friendly’ street environments through programmes such as Low Traffic Neighbourhoods are expected to have a positive impact.</p>
<p><b>Marriage and civil partnership</b></p>	<p>None</p>
<p><b>Socio-economic factors</b></p>	<p>Positive and negative</p> <p>There is a correlation between income and health, with lower income groups more likely to experience poor health<sup>16</sup>.</p> <p>Many of the negative external impacts of the transport network are experienced disproportionately by groups with fewer economic resources and those in relative deprivation. For example, exposure to poor air quality is correlated to proximity to main roads<sup>17</sup> where housing may be more accessible to these groups. Equally, these groups are over-represented in road traffic collisions<sup>18</sup>. In broad terms, the Strategy is expected to be positive in these respects by tackling these issues and reducing harmful impacts.</p>

<sup>15</sup> Impact of London’s Road Traffic Air and Noise Pollution on Birthweight, BMJ, 2017

<sup>16</sup> Health profile for England, Chapter 6, Social determinants of health, Public Health England, 2017

<sup>17</sup> Lambeth Air Quality Action Plan 2017

<sup>18</sup> Deprivation and road safety in London, Edward, Green, Roberts, London Road Safety Unit

	<p>The Strategy is also expected to have a positive impact by improving more affordable forms of transport such as walking, cycling and buses and also improving access to shared cars for occasional use.</p> <p>In some aspects there may be a negative impact as access to new technology, such as electric vehicles, tends to be unequal, favouring those with more resources. Specific mitigation for this includes through the provision of EV car club cars which offer a low cost alternative to car ownership. Differential charges for more polluting vehicles could adversely impact lower income groups and mitigation includes promotion of vehicle scrappage schemes. It is considered that any such negative impacts are countered by the broader air quality improvements that will result from the Strategy which are likely to benefit particularly lower income groups as above.</p> <p>The engagement strategies identified in the TSIP are also expected to lead to a better representation of lower income groups in the decision making process. For example, the provision of technical support to community groups who wish to engage with the Low Traffic Neighbourhoods programme.</p> <p>Future iterations of the TSIP will include a detailed review of bus services in the borough with the intention of increasing the council’s ability to promote and support improvements to access and this is expected to be particularly beneficial to lower income groups who are more likely to rely on buses as a relatively affordable form of public transport.</p>
<b>Language</b>	<p>Positive</p> <p>Improved wayfinding and legibility of the public realm is expected to have a positive effect.</p>
<b>Health</b>	<p>Positive</p>

	<p>Improving public health is at the heart of the Strategy. The main premise is that promoting walking, cycling and public transport will embed physical activity into daily routines, allowing people to be healthier. Improving health outcomes is a key objective for the council<sup>19</sup>. The Strategy proposes a Healthy Route network for this purpose and the TSIP sets out how this will be delivered. This approach is coupled with traffic reduction and measures to support the growth of low and zero emissions vehicles. The former is expected to benefit both physical and mental health<sup>20</sup> by creating quieter, safer neighbourhoods and the latter is expected to alleviate harmful effects of poor air quality that can affect a broad section of the population and especially those with underlying health issues.</p> <p>Measures to reduce carbon emissions are also expected to have a beneficial impact on health, by reducing the impact of climate change. Future iterations of the TSIP will deal more comprehensively with this topic following dialogue with the community around how the borough as a whole can reduce its carbon emissions.</p>
<p><b>2.2 Gaps in evidence base</b></p>	<p>No information has been found on specific relationships between transport impacts and the following groups:</p> <ul style="list-style-type: none"> <li>Gender re-assignment</li> <li>Sexual orientation</li> <li>Religion and belief</li> <li>Marriage and civil partnership</li> </ul> <p>Resources are not available to commission research in these areas, however we will continue to scan the environment for publications in these areas.</p>

<sup>19</sup> Active Lambeth, Lambeth Physical Activity and Sports Plan 2015 to 2020.

<sup>20</sup> Designing urban space of psychological comfort: The Kentish Town road project, Dillon, Ruth, Journal of Public Mental Health 2005, Vol 4, Issue 4

<b>3.0 Consultation, Involvement and Coproduction</b>	
<b>3.1 Coproduction, involvement and consultation</b>	<p>In the preparation of the the Draft Transport Strategy the follow groups were engaged:</p> <ul style="list-style-type: none"><li>Council officers</li><li>Cabinet Member for Environment and Clean Air</li><li>Ward Councillors</li><li>Transport user groups</li><li>Wheels for Wellbeing</li><li>Transport for London</li><li>Neighbouring boroughs</li></ul> <p>Engagement took the form of meetings, workshops and consultation events as well as public meetings. In particular, this led to further development of policies and actions to make the transport network more inclusive and accessible.</p> <p>The draft Transport Strategy was consulted on alongside the draft LIP for an 8 week period beginning on the 22 October 2018. The consultation was publicised in the Council’s quarterly magazine, which is distributed to households in the borough and has a circulation of approximately 6,000. Each of the borough’s libraries was sent a hard-copy of the transport strategy to assist those who may have difficulties using / accessing the the council’s website. Just over 300 responses were received in total.</p> <p>Respondents tended to under-represent younger people, as well as people with disabilities and in response specific stakeholder sessions were held with these groups.</p> <p>Selected feedback from the session for people with disabilities includes:</p> <ul style="list-style-type: none"><li>• Need more emphasis on safety. Make transport inclusive, safe and accessible.</li></ul>

	<ul style="list-style-type: none"> <li>• Need to recognise that sometimes there is conflict of needs between people with different disabilities - e.g. blind people need tactile paving, which is difficult for wheelchair users.</li> <li>• Designers / engineers need better training on accessibility, there isn't an access officer at LBL</li> <li>• Need standards for accessibility design, evaluation of plans based on disabled accessibility</li> </ul> <p>Selected feedback from the session for younger people includes:</p> <ul style="list-style-type: none"> <li>• Improvements to buses needed as young people reliant on these</li> <li>• Need for better provision for cycling</li> <li>• Concerns about affordability of transport</li> </ul> <p>A full consultation report is available<sup>21</sup>.</p>
<p><b>3.2 Gaps in coproduction, consultation and involvement</b></p>	<p>We have not been able to hold specific engagement activities with all the equality groups identified due to timescales / available resources. However, we have prioritised engagement with specific groups, including people with disabilities, in line with the key objectives of the Strategy.</p>
<p><b>4.0 Conclusions, justification and action</b></p>	
<p><b>4.1 Conclusions and justification</b></p>	

<sup>21</sup> [Draft Transport Strategy Consultation Report](#)

	<p>The Transport Strategy and TSIP are found to have broadly positive impacts on all identified groups. Any potential negative impacts identified for specific groups can be addressed in the development of projects and programmes and overall these are expected to be outweighed by broader public health and accessibility benefits.</p> <p>The TSIP includes a monitoring framework for the Strategy in order to track progress against strategic objectives, such as collision reduction and improving air quality. An annual report will be produced covering these indicators as well as reporting specific outputs, such as pedestrian crossings and car club spaces that have been delivered. As part of the Healthy Routes project an assessment will be carried out to establish the equalities impacts of a range of interventions, e.g. different types of crossings, in order to direct investment so that equalities objectives are met. Public engagement exercises relating to the delivery of projects will also be monitored to assess the degree to which equalities groups have been represented.</p>
<p><b>4.2 Equality Action plan</b></p>	
<p><b>Equality Issue</b></p>	<p><b>Mitigating actions</b></p>
<p>That the equality analysis may not have accurately covered all the equality impacts due to a lack of available evidence;</p>	<p>Continue to investigate and, where appropriate, commission further evidence to support ongoing equality analysis, particularly in areas where there is a lack of readily available evidence.</p> <p>Ongoing. Transport and Public Realm Strategy Manager</p>
<p>The development and delivery of projects and programmes identified in the TSIP may not address a wide range of equality impacts</p>	<p>Continue to develop inclusive community engagement approaches in the delivery of projects and programmes identified in the TSIP.</p> <p>Develop, agree and publish design standards for highway and public realm interventions with particular reference to the needs of equalities groups.</p> <p>Ongoing (Public Realm Design Guide expected summer 2020). Transport and Public Realm Strategy Manager</p>

<b>5.0 Publishing your results</b>	
The results of your EIA must be published. Once the business activity has been implemented the EIA must be periodically reviewed to ensure your decision/change had the anticipated impact and the actions set out at 4.2 are still appropriate.	
<b>EIA publishing date</b>	18 November 2019