Equalities Impact Assessment: Full Assessment

Before completing this form, you should have completed an Equalities Screening Tool and had sign off from your Head of Service and the Fairness and Equality Team.

This Equality Impact Assessment should be completed where the Screening Tool identifies a potentially negative impact on one or more specific groups but it can also be used to highlight positive impacts.

Summary of proposal

Name of proposal	Changes to the Highbury West and Highbury Fields Low Traffic Neighbourhoods
Reference number (if applicable)	N/A
Service Area	Climate Change and Transport
Date assessment completed	23 May 2022

Before completing the EQIA please read the guidance and FAQs. For further help and advice please contact equalities@islington.gov.uk.



1. Please provide a summary of the proposal.

Please provide:

- Context on how the service currently operates (if relevant) and the scope of suggested changes
- The intended beneficiaries and outcomes of the proposal
- Reference to any savings or income generation

The Highbury West and Highbury Fields Low Traffic Neighbourhoods (LTNs) are part of the council's people-friendly streets (PFS) programme that was agreed by the council's Executive on 18 June 2020. The decision to introduce the Highbury West and Highbury Fields LTNs as an 18-month trial was taken by then Corporate Director of Environment and Regeneration in consultation with the Executive Member for Environment and Transport on 17 November 2020. The scheme was implemented through an Experimental Traffic Order (ETO) that came into force on 11 December 2020. An updated ETO came into force on 10 December 2021 to enable changes to the LTN, introducing exemptions for Blue Badge holders that enabled them to register a single vehicle to pass through designated filters in the Highbury West or Highbury Fields LTN in which they live.

The Highbury West and Highbury Fields Low Traffic Neighbourhoods LTNs were implemented with eight camera-enforced traffic filters (Located at: Aubert Park, Benwell Road, Gillespie Road, Highbury Hill, Highbury Place [south of junction with Calabria Road], Highbury Place [North of junction with Highbury Corner], Monsell Road, Plimsoll Road and St Thomas's Road) and two bollard traffic filters (located at: Avenell Road and Plimsoll Road). Originally, the Highbury West and Highbury Fields Low Traffic Neighbourhoods LTNs were designed so that traffic filters applied to all people driving without any exemptions, beyond emergency vehicles and some council service vehicles. The council's initial rationale to not provide exemptions was based on three reasons:

- Access to all addresses is maintained within LTNs, but routes may need to change.
- To create a safer environment for people to walk, wheel and cycle by significantly reducing motorised traffic on local streets.
- To reduce congestion and air pollution on the main roads. The objective of peoplefriendly streets is to reduce the overall number of trips, by supporting a change of transport away from private cars.

As outlined in the 31 May 2022 delegated decision report for Highbury West and Highbury Fields, a new ETO is being introduced to expand upon a policy change adopted in the people-friendly streets Executive Report of 14 October 2021. The expanded policy will combine both Highbury LTN areas into one LTN and a new single permit code will be created that enables



- Context on how the service currently operates (if relevant) and the scope of suggested changes
- The intended beneficiaries and outcomes of the proposal
- Reference to any savings or income generation

eligible Blue Badge holders to register a single vehicle to pass through designated traffic filters in both Highbury LTNs, as opposed to only those sited within the LTN in which they reside. The new ETO also proposes that a contingency plan is established, that would create an emergency diversion route to be used in times of extreme disruption.

Finally, three resident parking spaces will be removed on Highbury Crescent to allow for safer turning movements for longer vehicles, in addition to introducing advisory signage designed to discourage these vehicles from entering the area.

This EqIA is required to support the new decision regarding the changes outlined above.

Beneficiaries of this new proposal will primarily be eligible Blue Badge holders who live in the Highbury LTNs (which includes properties on the LTN side of its boundary roads). The outcome will be that local Blue Badge holders will have shorter and more convenient local journeys by motor vehicle. It is possible that an increase in traffic within the area from Blue Badge holders using the roads could have a negative impact on some people with protected characteristics and this is explored below in more detail. Similar impact may also occur on periods when the emergency diversion route is activated, temporarily increasing traffic in the Highbury LTNs.

2. What impact will this change have on different groups of people?

Please consider:

- Whether the impact will predominantly be external or internal, or both?
- Who will be impacted residents, service users, local communities, staff, or others?
- Broadly what will the impact be reduced access to facilities or disruptions to journeys for example?

The assessment in this section does not consider the impact of the LTNs overall, as these impacts were considered in resident impact assessments (RIAs) dated 23 September 2020 and



14 September 2021. Note that in September 2020 and September 2021 all equalities impact assessments in Islington were referred to as resident impact assessments (RIAs). As of November 2021, the council has reverted back to calling them Equalities Impact Assessments. The original overall assessments have been updated and included in the tables in 3B which discuss the specific impacts on people with protected characteristics and from disadvantaged groups. The paragraphs below cover the impacts of the proposed changes to the Highbury West and Highbury Fields trial schemes.

The impact of the changes set out in the 31 May 2022 delegated decision report will be external, and will primarily impact Blue Badge holders driving within the Highbury West and Highbury Fields LTNs. Beneficial impacts will be felt by any Blue Badge holder who meets the following criteria:

- Lives within the Highbury LTN (this includes properties on the LTN side of the boundary roads)
- Has access to one vehicle which is eligible for exemption

These eligible Blue Badge holders will be granted a permit for a single vehicle to be able to pass through all of the camera enforced traffic filters within either LTN trial scheme area, without receiving a penalty charge. This will help disabled people who rely on their vehicles for short local journeys, allowing them to enter and exit the LTN from any of the boundary roads where there is available access/egress and take the shortest journey to and from the boundary road to their home (or any other location inside the LTN). At the time of writing, there are 433 Blue Badge holders estimated to live in the Highbury West LTN and 107 in Highbury Fields LTN, although not all will have access to a vehicle. However, the council will soon clarify that blue badge holders who live within the low traffic neighbourhoods will able to register a vehicle that they do not own, this clarification will further expand the number of beneficiaries of the blue badge exemption policy in the Highbury area.

As set out in Section 3B, at the time of introduction, people with disabilities who rely on taxis and PHVs, carers who are not eligible for the Blue Badge exemption and doctors will not benefit from the Highbury West and Highbury Fields LTNs being combined into a single scheme area. The council intends to work with other boroughs, TfL and taxi/PHV providers to explore the possibility of a technological and regulatory solution, which would allow specific and time limited exemptions for taxis/PHVs which are carrying Blue Badge holders who are Islington residents.

The council is also developing a policy, which will provide people who do not live within an LTN an opportunity to apply for an exemption from a single traffic filter. This is intended to shorten specific regular journeys for people who have no other option than using a car and who are



severely affected by longer journeys. Details on this policy will be provided in due course, and that policy will apply across all PFS schemes including Highbury.

Other users of the LTN, particularly people walking, using wheelchairs (or other mobility aids), or cycling, may notice an increase in traffic volumes inside the LTN. Pre-consultation monitoring data from December 2021 shows that traffic volumes have fallen by 72% on internal roads since the scheme was first implemented, and local people may have become accustomed to these lower volumes, which make it easier to cross the road, have reduced road danger and reduced noise and vehicle emissions.

By granting all eligible Blue Badge holders in the LTN an exemption from the designated traffic filter restrictions across both schemes, this reduction of traffic volumes may be reversed to some extent. In particular, there may be an increase in vehicle movements near (and through) the traffic filters themselves - areas where for the past 18 months there have been very few vehicle movements. However, the impact is likely to be minimal given the relatively small number of Blue Badge holders in the Highbury LTN (estimated 540) who will be exempt from the filters.

The impact of the emergency diversion route is likely to have a more significant impact on the rare occasions when it may be activated. Although it is anticipated that this route would only be used in rare circumstances, the volume of vehicles using the roads is likely to be very high, particularly as the function of the route is to relieve extreme congestion on the main roads surrounding the LTN. At the time of writing the operation and activation protocol for this measure is still in development, with associated impacts being considered as part of this work.

For many people who use the streets and pavements of the Highbury LTN, the impact combining both Highbury LTNs into a single scheme area may be an increase in road danger, noise and emissions. Evidence from across the PFS schemes in Islington is that the number of PCNs issued at traffic filters in LTNs does decrease over time, and so this increased compliance from all drivers should help mitigate any small increase in numbers from Blue Badge holder vehicle movements.



3. What impact will this change have on people with protected characteristics and/or from disadvantaged groups?

This section of the assessment looks in detail at the likely impacts of the proposed changes on different sections of our diverse community.

3A. What data have you used to assess impacts?

Please provide:

- Details of the evidence used to assess impacts on people with protected characteristics and from disadvantaged groups (see guidance for help)
- A breakdown of service user demographics where possible
- Brief interpretation of findings

As of 5 May 2022, the Highbury LTNs are located across Arsenal, Highbury and Finsbury Park Wards. However, at the time of writing statistics are only available for the wards that until 5 May 2022 were covered by the Highbury LTNs: Highbury West, Highbury East and Finsbury Park. It should be noted that Finsbury Park's data was not included in previous RIAs/EqIAs, as the LTN boundaries only covered a negligible section of the previous ward boundary which has since expanded. Table 1 provides a demographic breakdown of the Highbury West, Highbury East and Finsbury Park Wards, compared to Islington and London as a whole.

A higher number of people identify themselves as having a disability in Finsbury Park (26%) and Highbury West (19%) than the Islington average (16%), which is higher than the London average (14%). Conversely, the same proportion of Highbury East residents (14%) identify themselves as having a disability.

The higher percentage of Islington residents who have a disability is particularly significant for this EqIA and is referred to in the assessment of equalities impacts.

Socio-economic and disability data indicates that the Highbury East and Highbury West have less deprivation than the Islington average, and are ranked respectively as the 16^{th} and 13^{th} most deprived wards in the borough. Conversely, Finsbury Park Ward has more deprivation than the Islington average, ranking as the 1^{st} most deprived ward in the borough.

There is a slightly lower than average percentage of people who are Black and Minority Ethnic in Highbury East Ward (23.5%) than the Islington average (32%). Highbury West Ward has the same proportion as the Islington average (32%) and Finsbury Park Ward (43%) has a higher proportion then the Islington Average.



- Details of the evidence used to assess impacts on people with protected characteristics and from disadvantaged groups (see guidance for help)
- A breakdown of service user demographics where possible
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Whilst private cars, taxis and private hire vehicles can be an important means of transport for disabled people, the main means of transport used by disabled Londoners at least once a week are walking (81%), bus 58%, car as passenger (42%) and car as driver (24%). Source: Travel in London: Understanding our diverse communities 2019, (TfL, 2019).

Table 1 - demographics of London, Islington, Highbury West, Highbury East and Finsbury Park

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	London	Islington	Highbury West	Highbury East	Finsbury Park
	Total:	Total:	Ward	Ward	Ward
			Total:	Total:	Total:
	8,173,941	206,125	15,030	11,634	14,358
Gender: Female	51%	51%	51%	51%	50%
Gender: Male	49%	49%	49%	49%	50%
Age: Under 16	20%	16%	15%	17%	18%
Age: 16-24	12%	14%	12%	11%	14%
Age: 25-44	36%	42%	49%	43%	42%
Age: 45-64	21%	19%	17%	19%	18%
Age: 65+	11%	9%	7%	10%	8%
Disabled	14%	16%	19%	14%	26%
Ethnic	40%	32%	32%	23.5%	43%
group: BME	C00/	C00/	C00/	76 50/	F70/
Ethnic group: White	60%	68%	68%	76.5%	57%
Religion or belief: Christian	48.5%	40%	39%	40%	38%
Religion or belief: Muslim	12%	9%	10%	7%	16%



- Details of the evidence used to assess impacts on people with protected characteristics and from disadvantaged groups (see guidance for help)
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Religion or belief: Other	10%	4%	3%	4%	0.5%
Religion or belief: No religion	21%	51%	31%	34%	25%
Religion not stated	8.5%	49%	17%	15%	17%

Source: 2011 Census data available at: https://www.nomisweb.co.uk/

Table 2 shows the percentages of different trips by mode by different users, showing that disabled people in Islington are more likely to be car passengers (16.7% of trips) than non-disabled people (6.2% of trips). The proposed exemption expansion for the Highbury LTN addresses this, in part.

Table 2 - Percentages of different trips by mode by different users

Mode	All users in London	Disabled people in Islington
Walk	42.0%	41.2%
Pedal cycle	4.9%	1.2%
Car driver	7.4%	8.9%
Car passenger	6.2%	16.7%
Motorcycle	0.1%	0.0%
Van	0.3%	0.2%
Bus (public)	14.3%	14.4%
Underground	15.0%	11.4%
National Rail train	4.9%	1.7%



- Details of the evidence used to assess impacts on people with protected characteristics and from disadvantaged groups (see guidance for help)
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Taxi - London black cab	0.8%	1.7%
Taxi - other/minicab	1.6%	1.5%
London Overground	2.2%	1.1%

3Source: Analysis of the London Travel Demand Survey (LTDS) during the period 2016-19 (London Travel Demand Survey: https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/consultations-and-surveys#on-this-page-1)

Borough-wide evidence and rationale for the introduction of the Blue Badge exemptions can be found in the <u>resident impact assessment</u> (RIA) which accompanies the <u>Executive Report</u> on people-friendly streets which was published in October 2021. (It is worth noting that EqIAs were previously referred to in Islington as Resident Impact Assessments). Islington has one of the lowest proportions of car ownership per household in the country, with 71% of households having no access to a car. (Source: <u>Streetspace funding quidance - Appendix 7 2021</u>). Transport for London (TfL) has analysed that two thirds of car journeys in London can be walked or cycled - this proportion is likely to be even greater in an inner London borough like Islington. The implication of these figures is that there is great potential for a large number of trips in Islington to be made by modes other than private car, and even that many existing car journeys could be shifted to active travel modes, with public health and air quality benefits for all Islington residents.

24.3 million more miles were driven through Islington in 2019 than 2013 – an almost 10% increase. (Source: Department for Transport (DfT) https://roadtraffic.dft.gov.uk/local-authorities/96). Traffic on London's local ('C' or unclassified) streets has risen by 72% between 2009 and 2019, whereas traffic on A and B roads has seen a slight fall over the same timeframe. (Source: DfT https://roadtraffic.dft.gov.uk/regions/6). A and B roads were designed with signalised and multi-lane junctions, wider pavements, formal pedestrian crossings and bus lanes, all of which mean they are able to more safely manage higher volumes of motor traffic than local streets.

There is also a disparity in the road danger present on minor and main roads. In the UK, the most common non-natural cause of death amongst children aged 5 - 14 is being hit by a vehicle (http://www.sd-

commission.org.uk/data/files/publications/fairness_car_dependant.pdf), with a mile driven on



- Details of the evidence used to assess impacts on people with protected characteristics and from disadvantaged groups (see guidance for help)
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a minor road, compared to a mile driven on a main road, twice as likely to kill or seriously injure a child pedestrian, and three times more likely to kill a child cyclist. (https://www.icevirtuallibrary.com/doi/pdf/10.1680/jmuen.16.00068)

Disabled people are five times more likely to be injured as a pedestrian than non-disabled people. (https://roadsafetygb.org.uk/news/disabled-and-low-income-pedestrians-at-higher-risk-of-road-injury/)

However, LTNs installed in London in 2020 have been shown to reduce the number of injuries from road traffic collisions by half, relative to the rest of London, with no evidence of increased injury numbers or risk on LTN boundary roads

(https://findingspress.org/article/25633-impacts-of-2020-low-traffic-neighbourhoods-in-london-on-road-traffic-injuries). The people-friendly streets programme has therefore improved the safety of local roads without putting excessive burden on boundary roads.

As the Islington Transport Strategy notes, "Children from black and minority ethnic backgrounds are one and a half times more likely to be killed or seriously injured in a road collision than children from other backgrounds", so reducing road danger through implementing LTNs seeks to address this inequality directly.

Given the reasons above, more space needs to be allocated to active travel modes. These modes make a significant contribution to reducing road traffic congestion and improving health. They are also an affordable way of getting around.

The Blue Badge exemption policy is discussed in paragraphs 3.3.62 to 3.3.68 of the <u>Executive</u> <u>decision report</u> and pages 7-10 of the RIA). This policy exempts Blue Badge holders from the designated traffic filters of their home LTN for a single vehicle registered at their address, allowing them to drive through the restrictions.

This Executive Report was published with an additional appendix, produced by external transport consultancy Steer, called 'Journey Lengths and Times Analysis'. This provides data and analysis of typical motor vehicle journeys in Islington, including journeys within and between low traffic neighbourhoods. The study shows that "the impact of the restrictions on short journeys is significantly higher than the impact on long journeys" (paragraph 5.5), which leads to the recommendation that combining both Highbury LTNs' Blue Badge exemptions areas should be implemented.



- Details of the evidence used to assess impacts on people with protected characteristics and from disadvantaged groups (see guidance for help)
- A breakdown of service user demographics where possible
- Brief interpretation of findings

As of October 2021, there were 7,788 Blue Badge holders in Islington, 1,713 of whom live within existing LTNs.



3B: Assess the impacts on people with protected characteristics and from disadvantaged groups in the table below.

Please first select whether the potential impact is positive, neutral, or negative and then provide details of the impacts and any mitigations or positive actions you will put in place.

Please use the following definitions as a guide:

Neutral – The proposal has no impact on people with the identified protected characteristics

Positive – The proposal has a beneficial and desirable impact on people with the identified protected characteristics

Negative – The proposal has a negative and undesirable impact on people with the identified protected characteristics



Characteri stic or group	Positive / Neutral / Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
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Age

Positive and Negative

Positive:

Young people

An increase in activity, including walking and cycling, benefits children in terms of reducing childhood obesity.

The Fair Futures Commission found that some of the barriers to children and young people travelling independently revolved around concerns for personal safety, due to the threats from road danger. Reduced road danger should facilitate independent travel for children and young people, which is crucial to healthy child development.

Air pollution from motor vehicles has a significant impact on younger people who are closer to the car exhaust level and who have lungs that are still developing. A growing body of research demonstrates that this impact can result in significant health complications later in life impacting on their life expectancy and quality of life. Older adults are also known to be particularly sensitive to air pollution.

Children who have disabilities or mobility impairments may benefit from the expanded Blue Badge exemption policy, if their carers live with them inside an LTN. The exceptional circumstance dispensation for this exemption may also benefit children who, for example, attend a school in an LTN. It is also likely that older people with limited mobility who travel by private car could have Blue Badges and could benefit from the same policy. The positive impacts of LTNs on local traffic levels, as evidenced by pre-consultation monitoring reports, means less congestion for exempt vehicles.

Positive:

Permits for the expanded Blue Badge exemption will be directly granted to eligible residents (those who are Blue Badge holders, living within the Highbury LTN and also holding a Free Resident Parking Permit [FRP] and/or Dedicated Disabled Bay [DDB]). Granting these permits removes the burden of applying, as their registered vehicle details are already known to the council. For Blue Badge holders without an FRP or DDB, a short application will be required to register a vehicle for the exemption.



Older people

Older people, who have higher instances of disabling conditions such as mobility impairment, deafness or blindness will benefit from reduced traffic and road danger because of the lower volumes of cars traveling through the LTNs. In addition, older people are also more likely to live with dementia and will benefit from reduced noise pollution. Those older people who are able to increase their active travel will see benefits to their mobility and health.

Both age groups

For people of any age who are eligible for an exemption permit, local journeys by motor vehicle will be made shorter and more convenient.

The LTNs create improved conditions for cycling, particularly benefitting those older or younger residents with less balance who may want to choose adapted cycles away from traffic.

Older and younger people will benefit from safer crossings in particular because they can take longer to cross the road than the average-aged person.

Negative:

Although it is possible to access all addresses within the LTN, the number of older people who travel by private cars, private vehicles for hire, or taxis for their local

Negative:

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 slightly longer routes as a result of the LTN schemes. The council will work to promote uptake of this scheme amongst potentially affected groups.

The changes that will introduce limited



trips may increase over time and some individuals may be inconvenienced by longer journeys. Longer journeys may also involve higher financial costs.

Children and older people who do not drive or have access to a vehicle within their household could be impacted by the expanded exemption policy and emergency diversion route if local traffic rises. This could make streets more unsafe and create an intimidating environment for people who do not rely on cars for their mobility, ultimately hindering the objectives of the LTNs. However, this impact is likely to be minimal given the relatively small number of Blue Badge holders in both Highbury LTNs (estimated 540) who will be exempt from the filters.

exemptions for Blue Badge holders partly mitigates this identified impact on shorter journeys for some disabled people (which may include people of all ages, including older people and children / young people).

The exemption for people with an exceptional circumstance dispensation may also benefit disabled people who do not live in an LTN, by allowing access through a designated filter (for example, medical appointments). However, the exemption does not address the needs of those who rely on taxis



or other private hire vehicles. The council will work with other boroughs, TfL and taxi/PHV providers to explore the possibility of a technological and regulatory solution, which would allow specific and timelimited exemptions for taxis/PHVs which are carrying Blue Badge holders who are Islington residents. Traffic levels will be periodically monitored after implementation of the new ETO to ensure traffic is kept at low levels. If traffic



Characteri stic or group	Positive / Neutral / Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
			increases significantly, a review of the trial scheme's measures would take place.
			The council will ensure that appropriate signage is used at camera-enforced filters.



Disability

Positive and Negative

Positive:

Compared to the London average, there is a higher proportion of people in Islington who identify themselves as being disabled (16%, compared to the London average of 14%). Compared to the London average a higher proportion of people in Finsbury Park and Highbury West Wards identify themselves as being disabled (26% and 19%, respectively), while the same proportion of people in Highbury East ward identify themselves as being disabled (14%).

LTNs can enable easier or more pleasant journeys for disabled people: an increase in independence, a decrease in traffic danger and benefits to physical and mental health.

Pedestrian enhancements could be of particular benefit to people with a disability in terms of navigating the urban environment, including but not limited to those using walking aids, a wheelchair or a mobility scooter. This includes the improvements made through the emerging people-friendly pavements project, which will remove existing barriers, reduce street clutter and improve footway maintenance.

An accessibility audit of the Highbury East Ward was commissioned by the council and undertaken by an external consultant with relevant field expertise in early 2022, to identify areas of priority for people-friendly pavements improvements.

Positive:

Permits for the expanded Highbury LTN Blue Badge exemption will be directly granted to eligible residents (those who are Blue Badge holders, living within the LTN and also holding a Free Resident Parking Permit (FRP) and/or Dedicated Disabled Bay (DDB)). Granting these permits removes the burden of applying, as their registered vehicle details are already known to the council. For Blue Badge holders without an FRP or DDB, a short application will be required to register a vehicle for the exemption



In residential areas, those with cognitive disabilities could benefit from reduced levels of noise pollution, supported by the neighbourhood walking and cycling improvements and the removal of through-traffic. Moreover, some disabled people may feel more comfortable accessing the businesses in LTNs, due to the reduction in traffic as a result of the PFS measures.

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 (<u>Assessing the needs and experiences of disabled cyclists 2018</u>). LTNs aim to greatly improve conditions for disabled cyclists by reducing road danger without the need for further traffic calming measures.

In this way, providing better conditions for cycling can empower more disabled people to cycle, particularly those with less balance who may want to choose adapted cycles away from traffic. All traffic filters in the LTNs have been designed in a way that is inclusive and accessible to larger cycles such as tricycles and cargo cycles in line with the London Cycling Design Standards.

People who are Blue Badge holders who live within an LTN and have access to a vehicle registered at their address will also benefit from the proposed exemptions at designated camera-enforced filters in the LTNs where they reside. The exemption policy for individual traffic filters, which is currently being developed, may also

The council funds <u>Pedal</u> <u>Power</u> sessions for allability cycling, enabling people with a range of disabilities to experience safe cycling at the Emirates and Finsbury Park.

Negative:

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 slightly longer routes as a



benefit disabled people who do not live in an LTN, by allowing access through a designated filter (for example, for medical appointments). The positive impacts of LTNs on local traffic levels means less congestion for exempt vehicles.

result of the LTN schemes.

Negative:

Although it is possible to access all addresses, there may be an increase of disabled residents or visitors who travel in private cars, private hire vehicles (PHVs), or taxis may have to use new routes for their local trips and so may be inconvenienced by longer journeys (which may also involve higher costs).

The changes that will introduce expanded exemptions for Blue Badge holders partly mitigates this identified impact on shorter journeys for some disabled people.

However, it must be noted that private cars are just one means of travel for disabled residents and therefore should be considered on balance with the benefits. Evidence in section 3A of this EqIA shows that the proportion of trips taken by car, as a driver or passenger, is 25.6% for people with disabilities in Islington and 13.6% for Londoners as a whole. The main means of transport, used by 81% of disabled Londoners at least once a week is walking.

The exemption for people with an exceptional circumstance dispensation may also benefit disabled people who do not live in an LTN, by allowing access through a designated filter (for example, for medical appointments). However, the

The council is committed to engaging with disabled people and has undertaken preconsultation engagement with disabled people and groups representing them, and listened to feedback submitted via Commonplace, the trial feedback surveys and



general correspondence. This engagement forms part of the evidence informing the proposed exemption policy.

The council has therefore implemented exemptions for Blue Badge holders who live within (or on the boundary of) LTNs from local camera-enforced filters. Blue Badge holders are able to register a single private vehicle for these exemptions, which should improve journey times for local trips. The exemption policy for individual traffic filters, which is currently being developed, may also benefit disabled people who do not live in an LTN, by allowing access through a designated filter (for example, for medical appointments). However, aside for the proposals outlined in this document to enable motor vehicle travel for Blue Badge holding residents across both Highbury LTNs, this policy does not extend to covering trips across neighbouring LTNs, as the council has chosen to limit the exemption to shorter trips that are more impacted in terms of journey time and length compared to medium and longer trips. The decision not to exempt all Blue Badge holders in Islington from all the filters is informed by journey time and length data collected and analysed by an independent consultant, which showed that shorter car trips are most impacted by the LTNs while medium or longer journey lengths are not significantly impacted. As disabled people may be less likely to be able to replace these short car trips to and from their home LTN by other travel modes, they could be disproportionately affected by being unable to pass through the filters in their home LTN, which they would meet on every short local journey. Disabled people who do not live in an LTN do not have these short trips restricted in the same way and impacts on medium and longer journeys are less significant.

exemption does not address the needs of those who rely on taxis or other private hire vehicles.

The council will work with other boroughs, TfL and taxi/PHV providers to explore the possibility of a technological and regulatory solution, which would allow specific and time-limited exemptions for taxis/PHVs which are carrying Blue Badge holders who are Islington residents.

Traffic levels will be periodically monitored after implementation of



Blue Badge holders who do not live within an LTN will see no change from the current position after the exemption policy is implemented. These Blue Badge holders have been given consideration, but will not be included in the exemptions, as traffic filters do not currently affect journeys from their home to nearby main roads around their local neighbourhood. However, they may be able to use the exemption policy for individual traffic filters once it has been developed and implemented, to apply for an exemption which allows access through a designated filter in an LTN.

Similarly, people with disabilities who rely on taxis and PHVs, carers who are not eligible for the Blue Badge exemption and doctors will not benefit from the new exemption policy. As discussed in the 'Overview' paragraphs at the start of section 3 of the programme-wide RIA, the council seeks to balance exemptions with the benefits of reducing local traffic for all residents, including those with protected characteristics who have benefitted from the LTNs as they currently exist.

At time of writing, it is not possible to implement an exemption for Blue Badge holders using taxis or PHVs, as enforcement cameras would not know whether a Blue Badge holder (who is resident in an Islington LTN) is travelling in a vehicle. To apply the exemption to these Blue Badge holders, the implementable solution would be to exempt all taxis and PHVs that could use Islington's roads, which would have significant impacts in terms of traffic volumes and dilute the benefits of the LTNs. There are 114,900 licenced taxis and PHVs operating in London, as of 2020

the new ETO to ensure traffic is kept at low levels. If traffic increases significantly, a review of the trial scheme's measures would take place.

The council will ensure that appropriate signage is used at camera-enforced filters.



(<u>source</u>). This alternative is not considered acceptable. Therefore, for the purposes of the experimental traffic order and any future traffic order which supersedes the ETO, Penalty Charge Notices (PCNs) will apply to non-exempt vehicles going through the filters.

If a technological solution can be found which allows specific and timed exemptions for only those taxi/PHV trips taken by Blue Badge holders who are resident in Islington, compatible with our current use of Automatic Number Plate Recognition (ANPR), then the council will consider exemptions for taxis/PHVs for the purpose of carrying a Blue Badge holder. This would be of benefit only to the 3.2% of trips taken by disabled people which are in taxis or PHVs (this data is shown in Section 3A).

Disabled people who do not drive or rely on motor vehicles could be impacted by the exemption policy if local traffic rises. This could make streets more unsafe, and create an intimidating environment for people who do not rely on cars for their mobility, ultimately hindering the objectives of the low traffic neighbourhoods. However, this impact is likely to be minimal given the relatively small number of Blue Badge holders in both Highbury LTNs (estimated 540) who will be exempt from the filters.



Race or	Positive	Positive:	Positive:
ethnicity		As the Islington Transport Strategy notes, "Children from black and minority ethnic backgrounds are one and a half times more likely to be killed or seriously injured in a road collision than children from other backgrounds". The reduction of traffic volumes and road danger in the LTN should make cycling a more accessible transport mode among ethnically diverse people who are underrepresented among people who cycle for transport and for exercise.	The council can promote walking and cycling through its Active Travel programme. • by providing free cycle skills sessions to adults and children; • through the STARS programme which works with schools to enable healthier school travel; • by working with TfL and private companies to provide cycle hire; • through Try Before You Bike, an affordable bike purchase scheme for adult bikes, child bikes and cargo



Characteri stic or group	Positive / Neutral / Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
			bikes, including an option for businesses to purchase e-cargo bikes at a discount.
Religion or belief (include no faith)	Neutral	No specific impacts identified.	n/a



Characteri stic or group	Positive / Neutral / Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
Gender and gender reassignm ent (male, female, or non- binary)	Neutral	No specific impacts identified.	n/a



Maternity or pregnanc y

Positive and Negative

Positive:

Reduced volumes of traffic and speeds in low traffic neighbourhoods will create a less stressful environment, supporting a healthy pregnancy.

Parents and carers with prams will benefit from a better walking environment and reduced traffic flows when crossing roads, especially in the vicinity of schools. This includes the improvements made through the emerging people-friendly pavements project, which will remove existing barriers, reduce clutter and improve maintenance.

Parents or carers who use cycles or cargo cycles for family mobility will benefit from traffic filtering and reduced volumes of traffic. Road closures will be designed in a way that is permeable and accessible to larger cycles. It is anticipated that increased safety for people who are cycling will help to empower more parents and carers to use cargo cycles for family mobility.

Traffic filters will create informal play space for children specifically around closure locations, where there will be very low traffic following implementation.

Positive:

The council can promote walking and cycling through its Active Travel programme.

- by providing free <u>cycle skills</u> sessions to adults and children;
- through the <u>STARS</u> programme which works with schools to enable healthier school travel;
- by working with TfL and private companies to provide cycle hire;
- through <u>Try Before</u>
 <u>You Bike</u>, an
 affordable bike
 purchase scheme for
 adult bikes, child
 bikes and cargo



Pregnant people and unborn children in particular may be adversely impacted by air pollution. LTNs are expected to reduce traffic volumes and congestion on Islington roads, which is expected to contribute to improved air quality on these streets.

bikes, including an option for businesses to purchase e-cargo bikes at a discount.

Negative:

Although access to all addresses is maintained as part of LTN schemes, pregnant people and those with young children may rely on private cars, private vehicles for hire, or taxis more for their local trips and so may be inconvenienced by longer journeys. Longer journeys may also involve higher costs.

Pregnant people or parents/carers with young children may have reduced mobility, take longer to cross the road, be more vulnerable to traffic collisions and/or be more reliant on car transport, therefore they may be particularly impacted if schemes result in increased traffic and congestion on streets they live on. Pregnant people and unborn children may be particularly impacted by poorer air quality which may result from increased traffic and congestion on their streets.

Pregnant people or parents/carers with young children who do not drive could be impacted by the exemption policy if local traffic rises. This could make streets unsafe, and create an intimidating environment for people who do not rely on cars for their mobility, ultimately hindering the objectives of the LTNs.

Negative:

Traffic levels will be periodically monitored after implementation of the new ETO to ensure traffic is kept at low levels. If traffic increases significantly, a review of the trial scheme's measures would take place.

The council will ensure that appropriate signage is used at camera-enforced filters.



Characteri stic or group	Positive / Neutral / Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
		Pregnant people or parents/carers with young children could also be disproportionately impacted by the introduction of new street furniture and infrastructure (such as signage or cycleway wands) which may affect their accessibility if infrastructure is not suitably positioned.	



C
Sex and sexual
orientatio
n

Neutral

Positive:

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 walking and cycling conditions and reduced traffic levels. This includes the improvements made through the people-friendly pavements project, which will remove existing barriers, reduce clutter and improve maintenance.

In London, women are less represented than men in cycling, and lack of safe cycle infrastructure disproportionally impacts women, attributable in part to a more risk averse attitude to mixing with traffic. Reduced traffic and new cycle infrastructure will benefit and empower more women to cycle.

Negative:

Some women might feel less safe at night walking than driving if there are lower volumes of traffic traveling through the area, and the LTN restrictions might make local routes longer.

Negative: Highbury West and Highbury Fields pre-consultation monitoring data does not suggest the LTN has had a negative impact on anti-social behaviour (ASB) and crime, however perception of safety and insecurity can deter people from using active travel modes. The council will investigate improving the public realm in ways which could deter the potential for crime, and to make areas feel subjectively safer. These public realm improvements could include improving sightlines for people walking and introducing



Characteri stic or group	Positive / Neutral / Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
			new or improved public lighting. In addition, the council is committed to work with its Community Safety Team and the Metropolitan Police to make Islington's streets safer.
Marriage or civil partnershi p	Neutral	No specific impacts identified.	n/a



Characteri stic or group	Positive / Neutral / Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
Other Age (e.g. elderly)	Neutral	No specific impacts identified.	n/a
(e.g. people living in poverty, looked after children, people who are homeless or refugees)			



Socioeconomic status (To be treated as a Protected Characteri stic under

section 1

of The

Equality

Act 2010)

Positive and Negative

Positive:

Busier roads can, in some areas, dominate more deprived communities. Walking and cycling improvements will benefit those living near busy roads and collision hotspots when they are moving around their local area. Islington is an extremely diverse borough and the index of deprivation across the borough shows that deprivation does not strictly follow main roads. One of the key findings of a 2021 paper on the interaction of socio-economic status and LTNs is that "Across London as a whole, people in the most deprived quarter of OAs [output areas, administrative areas containing around 300 residents] were 2.7 times more likely to live in a new LTN, compared to Londoners in the least deprived quarter" (source).

Generally, car ownership correlates to household income in London. Therefore, less affluent households are less likely to own a car – and be reliant on walking, cycling and public transport. The low traffic neighbourhoods in the PFS programme aim to benefit people who do not own cars by making it easier for them to travel by other modes.

Although the cost of motoring over the past ten years has risen at a lower rate than the cost of living (and significantly lower than rises in public transport costs) (source) it is estimated that owning and running a car in the UK costs around £3,900 per household annually (source). There is clearly a benefit to those who are economically disadvantaged if LTNs reduce this cost burden, by removing the perceived need for a motor vehicle once other options become more attractive.

Positive:

The council can promote walking and cycling through its Active Travel programme.

- by providing free <u>cycle skills</u> sessions to adults and children;
- through the <u>STARS</u> programme which works with schools to enable healthier school travel;
- by working with TfL and private companies to provide <u>cycle hire</u>;
- through <u>Try Before</u>
 <u>You Bike</u>, an
 affordable bike
 purchase scheme for
 adult bikes, child
 bikes and cargo



Finally, the greater connectivity via new cycling and walking routes should support social distancing whilst providing better healthy access to employment.

Negative:

There might be lower income residents who use a private car, for instance for work, and might be impacted by longer journeys and higher fuel costs.

However evidence shows that lower-income households are less likely to have access to private cars and tend to be more represented amongst bus passengers. This means that any displacement of traffic onto main roads which affects bus journey times could disproportionately impact people on lower incomes. Should any traffic displacement occur, it could also have a disproportionally negative impact on some of Islington's more deprived communities, with consequences in terms of congestion, severance and air quality. However, as noted in the positive impacts, "people in the most deprived quarter of OAs [output areas, administrative areas containing around 300 residents] were 2.7 times more likely to live in a new LTN, compared to Londoners in the least deprived quarter."20 This means that any increase of traffic volumes within LTNs as a result of the new exemption policy could disproportionately impact some of Islington's more deprived communities.

Purchasing and maintaining a cycle is significantly less expensive than the comparable costs for motor vehicles, and can be cheaper than public transport fares.

bikes, including an option for businesses to purchase e-cargo bikes at a discount.

Negative:

Steer's journey time analysis study shows that shorter car journeys are the most affected by LTNs, and whilst delays might occur, LTNs make cheaper transport options such as cycling more attractive by improving active travel conditions

The council has a robust and comprehensive monitoring strategy to gather data on the displacement impacts



Nonetheless, people with less disposable income may be less able to own a cycle than those with more disposable income. Other barriers to cycle ownership could include adequate private storage space which would be less available to those without a large internal area or private shed/garden. This in turn would mean individuals from lower socio-economic backgrounds would not have equal access to the new cycle infrastructure or not benefit as greatly from the improved cycling environment.

on main roads including air quality data where possible. This data will be one of the factors to be considered carefully in deciding to transition to a permanent traffic order or to introduce mitigating measures.

Air quality schemes are being rolled out in parallel, for instance the installation of Electric Vehicle Charging Points and the Ultra-Low Emission Zone extension since October 2021.

The council has a programme to help with the affordability of maintaining and



Characteri stic or group	Positive / Neutral / Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
			securely storing cycles. Islington's 'Try before you bike' scheme helps people purchase a new cycle with monthly payments (£20 for an adult cycle, £10 for children), with the option of returning the cycle and stopping payments if they choose to.



4. How do you plan to mitigate negative impacts?

Please provide:

- An outline of actions and the expected outcomes
- Any governance and funding which will support these actions if relevant



Negative Impact	Action	Expected outcome	Governance and funding
More inconvenient car trips More costly trips if taxis or private hire vehicles are relied on for some people falling into protected characteristics groups such as age, disability and parental status.	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 slightly longer routes as a result of the LTN schemes. The council will work to promote uptake of this scheme amongst potentially affected groups.	Increased use of scheme amongst target participants	Transport Projects and people-friendly streets team to oversee. London Councils provide funding.
More inconvenient car trips The combined LTNs and single Blue Badge exemption, does not include taxis and private hire vehicles, doctors or carers.	The council will work with other boroughs, TfL and taxi/PHV providers to explore the possibility of a technological and regulatory solution, which would allow specific and time-limited exemptions for taxis/PHVs which are carrying Blue Badge holders who are Islington residents. The exemption policy for Blue Badge holders will be complemented by an exemption policy for individual traffic filters, which is currently being developed. This will	Both actions would result in an extension of the exemption policy to include more trips by disabled people.	Transport Projects and people-friendly streets team to oversee. Transport for London and London Councils to help explore options. TfL and London Councils

	benefit some people who do not meet the exemption criteria.		provide funding.
Boundary roads impact Possible increase of bus journey times which would impact on older, disabled or lower income residents disproportionately. However, the impact is likely to be minimal given the relatively small number of Blue Badge holders the Highbury LTN (estimated 540) who will be exempt from the filters.	The council has a robust and comprehensive monitoring strategy to gather data on the displacement impacts on main roads. This data will be one of the factors to be considered carefully in deciding to transition to a permanent traffic order or to introduce mitigating measures. If required and informed by monitoring data, the council will work with TfL to identify bus priority corridors to improve bus journey times. Bus priority schemes will be implemented in consultation with TfL to protect bus journey times if data demonstrates that there are increased delays in bus journeys for a sustained period.	If mitigations are required, they should lead to improving and more predictable bus journey times.	Transport Projects and people-friendly streets team to oversee. Traffic and Engineering team to liaise with Transport for London if mitigations are required. Funding to be sourced from TfL in the first instance and from council capital as a second resort.

Boundary roads impact

Possible increase in air pollution on the main roads which would impact disproportionately on residents living on main roads.

However, the impact is likely to be minimal given the relatively small number of Blue Badge holders in the Highbury LTN (estimated 540) who will be exempt from the filters

The measures proposed to introduce an emergency diversion route would ease traffic congestion during extremely busy periods. In addition to this, the council has commissioned an independent consultant to explore further mitigating measures beyond the scope of this document, that could be implemented to ease congestion on Blackstock Road.

The council has a robust and comprehensive monitoring strategy to gather data on the displacement impacts on main roads including air quality data where possible. This data will be one of the factors to be considered carefully in deciding to transition to a permanent traffic order or to introduce mitigating measures.

Air quality schemes are being rolled out in parallel, for instance the installation of Electric Vehicle Charging Points (EVCP) and the Ultra-Low Emission Zone (ULEZ) extension since October 2021.

If mitigations are required, they should be designed to improve air quality on main roads.

Transport
Projects and
people-friendly
streets team
to oversee,
working with
the Air Quality
team and the
Traffic and
Engineering
team.

Funding to be sourced from TfL in the first instance and from council capital as a second resort.



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 the new cycle infrastructure.	The council has a programme to help with the affordability of maintaining and securely storing cycles. Islington's 'Try before you bike' scheme helps people purchase a new cycle with monthly payments (£20 for an adult cycle, £10 for children), with the option of returning the cycle and stopping payments if they choose to.	These actions should lead to a wider uptake of the use of cycles encouraging wider use of active travel among residents in the LTN or who travel through it	Housing, Community development oversee elements of the cycle storage programme. Transport Strategy and Active Travel oversee public bike hangars and the 'Try before you bike' (TBYB) scheme. Cycle storage and TBYB are council- funded.
People with restricted mobility could be disproportionately disadvantaged by the introduction of new street furniture and infrastructure (such as signage and cycleway wands) which may affect their accessibility if infrastructure is not suitably positioned.	The people-friendly pavements initiative will ensure impacts are minimised and accessibility improved in the public realm. Potential conflict to be minimised through the assessment of locations for proposed street furniture/infrastructure to minimise and or eliminate negative impacts on accessibility. Engagement with disabled groups will also identify if there are outstanding issues with accessibility for people with restricted mobility.	Long-term outcomes are for a better public realm, with more people able to access and use footways and other spaces.	Transport Projects and people-friendly streets team will oversee, with works carried out by Traffic and Engineering. Section 106 and CIL can be used at ward level to improve accessibility on

	Highbury Fields area audit commissioned from an independent consultant with relevant field expertise, to identify various hazards that pedestrians with a range of mobility issues might encounter in the LTN area including cluttered street furniture.		pavements and roads. Highways maintenance programme can also contribute to improving accessibility.
Traffic levels Traffic on local LTN streets rises as a result of the exemption policy. Benefits of the LTN are diluted, with worsening air and noise pollution, traffic danger, which will hinder uptake to active travel and the council's ambitions to achieve net zero carbon by 2030. Exempt vehicles might take people walking by surprise, which could result in collisions. This would impact in particular protected groups such as age, disability and parental status.	Monitoring traffic levels after implementation of the exemption policy to ensure traffic is kept at low levels. If traffic increases significantly, a review of exemptions would take place. The council will ensure that appropriate signage is used at camera-enforced filters. There might be no exemptions at traffic filters where there is a road danger such as lack of visibility.	If mitigations are required, they should be designed to reduce traffic volumes within the LTN.	Transport projects and people-friendly streets to oversee. Monitoring will be funded from the PFS budget.

However, the impact is likely to be minimal given the relatively small number of Blue Badge holders in the Highbury LTN (estimated 540) who will be exempt from the filters.		



5. Please provide details of your consultation and/or engagement plans.

Please provide:

- Details of what steps you have taken or plan to take to consult or engage the whole community or specific groups affected by the proposal
- Who has been or will be consulted or engaged with
- Methods used or that will be used to engage or consult
- Key findings or feedback (if completed)

A specific consultation on the Highbury West and Highbury Fields LTNs took place between 7 February 2022 and 14 March 2022. Full consultation reports for each LTN are appended to the delegated decision report (DDR) for these changes, and the DDR itself summarises elements of the consultation.

The introduction of the Blue Badge exemption policy was agreed in the council's <u>Executive</u> Report of 14 October 2021. This document, and its accompanying <u>resident impact</u> assessment, contain more details on the engagement carried out to develop the policy.

In response to recent engagement since the publication of the Executive Report the council has simplified the application process by automating the granting of an exemption where possible for Blue Badge holders living within the Highbury West and Highbury Fields LTNs.

The council has been listening to residents through public engagement and consultation, in addition in addition to monitoring of the Highbury trial schemes. In response to public feedback and data gathered through these exercises the council acknowledges that Highbury Blue Badge holders would benefit from the ability to travel through both LTN trial scheme areas, when carrying out essential journeys by motor vehicle.

In response to the recent and historic engagement with disabled groups and individuals the council will be developing and introducing a policy which will involve a case-by-case consideration for individuals requesting exemption beyond the standard home LTN approach. The council recognises the need for this and will continue engaging with disabled groups and representatives on further developing this engagement route. This exemption would allow a successful applicant to drive through a designated filter in an LTN in which



Please provide:

- Details of what steps you have taken or plan to take to consult or engage the whole community or specific groups affected by the proposal
- Who has been or will be consulted or engaged with
- Methods used or that will be used to engage or consult
- Key findings or feedback (if completed)

the applicant does not live. Details around the application processes and exact criteria will be published in due course.

In response to recent and historic engagement with disabled groups with regards to the need for exemptions for disabled taxi users and disabled people who may not have Blue Badges, the council acknowledges that the implementation of this policy will not benefit those users and is limited. The justification and rationale for the exclusion of taxis is explained in more detail in section 3B of this EqIA.

In response to resident feedback and lessons learned throughout the Highbury LTN trials, the council acknowledges that is necessary to establish an emergency diversion route and corresponding protocol, for periods of extreme congestion on main roads around the scheme area. This measure is in development at the time of writing, with any associated impacts will be considered separately.

In response to resident feedback and lessons learned throughout the Highbury LTN trials, the council acknowledges that some further measures are required to discourage longer vehicles from entering the Highbury Fields LTN.

The council will continue to engage directly with groups representing disabled people and disabled individuals as part of the wider people-friendly streets programme. In May 2022 the council established an Islington Transport Accessibility Advisory Group which gathers officers and representatives of disability and mobility groups to discuss transport-related topics. The group provides the opportunity for community groups to advise on emerging policy related to transport and people-friendly streets at an early stage and give advice on engagement approaches, spanning exemptions to people-friendly pavements.

Further feedback will be taken into account in a final decision on the experimental traffic order for the Highbury West and Highbury Fields LTNs.



6. Once the proposal has been implemented, how will impacts be monitored and reviewed?

Please provide details in the table below.

Action	Responsible team or officer	Deadline
Traffic volumes in the Highbury LTN will be monitored and compared to the findings in the interim and preconsultation monitoring reports.	Transport projects and people- friendly streets team.	Ongoing
The number of exemption permits issued will be monitored.	Transport projects and people- friendly streets team. Blue Badge team.	Monthly reports
Feedback from Blue Badge holders will be monitored.	Transport projects and people- friendly streets team. Blue Badge team.	Ongoing

Please send the completed EQIA to equality for quality checking by the Fairness and Equality Team. All Equality Impact Assessments must be attached with any report to a decision-making board and should be made publicly available on request.

This Equality Impact Assessment has been completed in accordance with the quidance and using appropriate evidence.



Member	Name	Signed	Date
Staff member completing this form			24/05/22
Fairness and Equality Team			24/05/22
Director or Head of Service			24/05/22