

# Equalities Analysis Assessment



EAA Title	<b>School Streets</b>
Please describe your proposal?	<b>Implementation of 10 permanent school streets schemes</b>
Is it HR Related?	<b>No</b>
Corporate Purpose	<b>Cabinet decision</b>

## 1: Introduction

This Equalities Analysis Assessment (EAA) is for the London Streetspace Programme School Streets, including the Perivale scheme. It is an update to the EAA published with the officer report which recorded the decisions to make of the Experimental Traffic Orders (ETO) dated 26<sup>th</sup> October 2020 for LSP schemes and 2<sup>nd</sup> November 2020 for the Perivale scheme.

An EAA is a living document, ensuring the Council has a continuing consideration of its public sector equality duty, and should be reconsidered if new information comes to light or when any significant changes are made to the scheme it is assessing. The updated EAA is undertaken as part of the decision-making process for new Traffic Management Orders being proposed, with changes being made to the operation of the School Streets, namely

- limiting exemptions for Blue Badge Holders from the original general exemption to those:  
Blue badge holders who are resident or work in the area can register with the Council to allow them access to the closure during operational times or.  
Blue badge holders who are dropping off and collecting staff and pupils, or the parent of a blue badge holder that attends the school, will be exempt subject to them also applying to register with the Council to allow them access to the closure during operational times.
- Removing the exemption for school staff
- Camera enforcement to replace the barrier enforced design.

## 2. Proposal Summary Information

### 2a. What is the Scheme looking to achieve? Who will be affected?

School Streets is a scheme where the streets near a school are closed to most vehicles at school opening and closing times. Closing the streets to school and through traffic helps to achieve a safer, more pleasant environment for everyone using the streets whilst maintaining access for residents and businesses within the zone, and all pedestrians and cyclists.

School Streets are usually implemented to encourage active travel, improve air quality and reduce road danger outside of schools. However, a vital additional purpose for the COVID-19 recovery was to provide additional space outside of schools so that parents/carers could drop off and collect their children whilst safely social distancing. Schools helped with staggered start and end times, widening their entrances as much as possible and using additional entrances and/or one-way systems where possible.

## Equalities Analysis Assessment

The Perivale scheme was implemented with funding from the Local Implementation Plan (LIP) and 11 further schemes were implemented using funding from the London Streetspace Plan (LSP), which is a central Government fund (administered by TfL) in response to the COVID emergency.

The 2020 schemes utilised an Experimental Traffic Order (ETO), allowing for monitoring of impacts and changes to the schemes during the experimental period.

These schemes were implemented using mobile barriers, managed by volunteers. It is now proposed that these School Streets be enforced by Automatic Number Plate Recognition (ANPR).

Exemptions currently apply to vehicles registered at residents and businesses within the zone, school staff, blue badge holders and all emergency service vehicles. Other vehicles, including parents, f and deliveries, are not permitted to access the School Street.

It is proposed to amend the exemptions as outlined in paragraph 1 above.

Signs at the entrances to the scheme inform drivers of the restrictions. Non-registered vehicles will not be allowed to enter the scheme during the times of operation.

Schools that were chosen to participate in these schemes had already tried other means of improving the road environment around the school gates. One of the selection criteria for this programme was that schools had achieved, or were working towards achieving, a TfL Stars accreditation, where they support safe and sustainable travel. Schools have continued to promote active travel and raise awareness of road safety for the school journey.

This EAA relates to 10 School Streets, the Perivale scheme and 9 LSP schemes which it is now proposed be made permanent. 2 LSP schemes are recommended to Cabinet for redesign.

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

The overall benefits of Schools Streets are:

- Reduced school related parking and congestion at the school gates, within the school street zone,
- Improved environment for safe and sustainable travel to school
- Raised awareness of active travel and encouraging walking, scooting and cycling by the school community
- Improved mental and physical health and well-being by increasing active travel
- Reduced air pollution through the reduction in car use

The scheme will help to achieve the 3 core objectives of the LBE Transport Strategy:

- Modeshift – *increasing active travel*
- Reducing the environmental footprint of transport – *improve air quality*
- Improving road safety – *reduce road safety incidents*

Whilst these are the first School Streets in Ealing these schemes have been successfully implemented in many Local Authorities in London and nationally, including industry leaders Hackney, Camden, Birmingham, Solihull and Edinburgh, using various types of enforcement. The result is a reduction in

## Equalities Analysis Assessment

traffic around the school gates and more children walking, cycling or taking public transport to their school, instead of being dropped off by car, at the school gate.

Resources and research supporting the implementation of School Streets to increase active travel can be found on this website: <http://schoolstreets.org.uk/resources/> This includes a review of 16 existing School Streets, showing that these closures can improve the number of children walking, cycling and wheeling to school without creating road safety problems. <https://www.napier.ac.uk/about-us/news/school-street-closures>

The school run makes up over a quarter of London's morning traffic. In Ealing 85% of primary pupils live up to 1 mile but only 69% travel actively to school. The proportion of car journeys (totalling 23%, down from 25% in 2016/17) is higher than the number of pupils living over 1 mile from school, suggesting that a number of these car journeys are short and therefore walkable or cycleable.

Residents in surrounding streets may be concerned that there will be increased congestion for them. We will be working with school communities to identify and promote locations away from schools where parents can park; this should disperse the cars over a wider area than at present. Experience from other Boroughs shows that residents in surrounding roads are not adversely affected as parking by families who chose to drive will be dispersed over a much wider area.

A research report has been published by Edinburgh Napier University on displacement of traffic and road safety following the implementation of school streets <https://www.napier.ac.uk/about-us/news/school-street-closures> The findings show traffic displacement doesn't cause road safety issues in neighbouring streets.

In January 2021 TfL published an evaluation of School Streets and found there is a good level of support for these schemes <https://content.tfl.gov.uk/school-streets-evaluation-report-website.pdf>

A GLA study published in March 2021 found that School Streets reduced nitrogen dioxide by up to 23 per cent during morning drop off. The air quality monitoring report can be found here: <https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/school-streets-air-quality-study>

### 3. Impact on Groups having a Protected Characteristic

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

**Positive and negative impact**

**Describe the Impact**

#### **CONSTRUCTION**

Construction is the installation of road signs and cameras. These will be fixed to existing poles where possible, or new poles installed if required. There will be no significant noise or obstruction. The impact is, therefore considered to be **neutral**.

#### **OPERATION**

If a particular resident is wholly or mostly dependent on car or vehicular travel (e.g. older people with a significant mobility impairment), the operation of the finished scheme will have **no additional impact** as all residents of the school street, including those with mobility issues, will be able to apply for a permit allowing access during the closure time.

## Equalities Analysis Assessment

Older non-residents who have mobility issues and are dependent on car or vehicular travel may have a **slight negative impact** with possible longer journey times at defined periods of the day during school closing and opening times.

No buses are routed through any of the School Street schemes.

The impact on older pedestrians, those with disabilities and children and their families is expected to be **positive**. Road safety in the residential area is expected to be improved with lower traffic volumes allowing more walking and cycling in the area. No buses are routed through any of the School Streets.

For those who are able to walk and cycle and choose to utilise active travel modes, the scheme is expected to be **positive**. The expected reduction in traffic in the residential area is expected to make it more conducive to walking and cycling with an associated lower road safety risk.

Access will be maintained for emergency vehicles through Automatic Number-plate Recognition (ANPR) cameras. As the School Street is a low traffic zone and unauthorised vehicles will not be able to enter the area, Emergency Services may find the School Streets provide unhindered access for their vehicles which could help response times which would be a **positive impact**.

Officers have consulted and continue to work with the emergency services to resolve any significant issues, therefore, it is concluded that there will be **no significant impact**.

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

### Describe the Mitigating Action

All residents within the scheme will receive a permit. Residents can apply for additional permits for carers. Their visitors and deliveries are not permitted to enter the zone and will be asked to arrive outside of the closure times.

**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>.**

### Positive, negative and neutral impacts

#### Describe the Impact

##### CONSTRUCTION

Construction is the installation of road signs and cameras. These will be fixed to existing poles where possible, or new poles installed if required. There will be no significant noise or obstruction. The impact is, therefore considered to be **neutral**.

##### OPERATION

No street furniture will be placed on the footway or block any desire lines at junctions, therefore, operation of the implemented scheme would be **neutral** for visually impaired people.

<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.

## Equalities Analysis Assessment

Blue badge holders who are resident or work in the area can register with the Council to allow them access to the closure during operational times. It is also proposed that any blue badge holders dropping off and collecting staff and pupils should also be exempt subject to them also applying to register for dispensation. Officers will advise the school of the application process in order to support these registrations.

Parents or carers of a child with a blue badge can register with the Council to allow them access to the closure during operational times. Applications for temporary permits will be considered if access is an issue due to short term health or mobility issues.

Approved providers of Special Needs Transport will be permitted to enter the zone.

The operation of the proposed permanent scheme will have **no additional impact** on the above groups as they can apply for an exemption.

Operation of the implemented scheme is likely to generate a **slight positive impact** on an unknown number of people with breathing difficulties if traffic volumes within the residential area reduce and traffic volumes on the boundary roads remain broadly similar to pre-COVID volumes as expected due to reduced air pollution.

Operation of the finished scheme is likely to generate a **positive impact** on an unknown number of pedestrians and cyclists with mobility issues due to reduced traffic volumes making for a more pleasant, safer walking and cycling environment.

Access will be maintained for emergency vehicles through Automatic Number-plate Recognition (ANPR) cameras. As the School Street is a low traffic zone and unauthorised vehicles will not be able to enter the area, Emergency Services may find the School Streets provide unhindered access for their vehicles which could help response times which would be a **positive impact**.

However, the operation of the proposed permanent scheme will have some **negative impact** on those with disabilities reliant on car or vehicle travel during the defined periods of the day at school opening and closing times as those vehicle (including taxis collecting or dropping off someone with a disability) will not be permitted to enter the road closure.

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

### **Describe the Mitigating Action**

Disabled residents and business employees within the scheme will receive a permit. Residents can apply for additional permits for carers. Their other visitors are not permitted to drive into the zone during the defined periods of the day and will be asked to arrive outside of the closure times or park in alternative streets.

Blue badge holders who are resident or work in the area can apply for a permit. Also, blue badge holders dropping off and collecting staff and pupils, and parents or carers of a child with a blue badge can apply for a permit. Officers will provide support to schools and applicants.

Approved providers of Special Needs Transport will be permitted to enter the zone.

## Equalities Analysis Assessment

Ensure residents are continued to be made aware of the School Streets schemes so that alternative arrangements (e.g. new routes) are known.

**GENDER REASSIGNMENT:** *This is the process of transitioning from one sex to another. This includes persons who consider themselves to be trans, transgender and transsexual.*

Neutral impact

**Describe the Impact**

There is no clear evidence, data or rationale to expect that these works will have a differential impact on people with this characteristic.

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

**Describe the Mitigating Action**

Not applicable.

**RACE:** *A group of people defined by their colour, nationality (including citizenship), ethnic or national origins or race.*

Neutral Impact

**Describe the Impact**

There is no clear evidence, data or rationale to expect that these works will have a differential impact on people with this characteristic.

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

**Describe the Mitigating Action**

Not applicable.

**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.*

Neutral impact

**Describe the Impact**

If an attendee of a religious building is wholly or mostly dependent on car or vehicular travel (e.g. a person with a significant mobility impairment or wheelchair users), the operation of the School Street may generate a **low negative impact** initially. However, this is not specific to any religious belief so is covered more fully in the disability section of this EEA.

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

**Describe the Mitigating Action**

Not applicable

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

Neutral impact

**Describe the Impact**

## Equalities Analysis Assessment

Women are more likely to do most of the work involved in looking after children and other family members. In lockdown, mothers in two-parent households were only doing, on average, a third of the uninterrupted paid-work hours of fathers. <https://www.ifs.org.uk/publications/14861>

According to the [2014 National Travel Survey](#), trips to escort children to school are more likely to be made by women aged 30 to 49.

The School Streets may impact an unknown number of parents who drop children and school and go on to work and are therefore constrained by time. This may have a **low negative impact**.

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

**Describe the Mitigating Action**

Parents who feel they need to drive can park legally nearby and walk the last part of the journey. If available, information will be provided on locations where parents can park, such as supermarket, leisure centre car parks or Park & Stride areas. In Ealing, 84% of pupils live within 1 mile of their school. This is a 20 minute walk. 62% live within a ten minute walk.

**SEXUAL ORIENTATION: A person's sexual attraction towards his or her own sex, the opposite sex or to both sexes.**

**Neutral impact**

**Describe the Impact**

There is no clear evidence, data or rationale to expect that these works will have a differential impact on people with this characteristic.

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

**Describe the Mitigating Action**

Not applicable.

**PREGNANCY & MATERNITY: 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.**

**Neutral impact**

**Describe the Impact**

Greater reliance on car - little time impacts  
 Emergency services will be able to access the road closures meaning that response times are expected to be largely unaffected. This may be perceived as a slight negative impact, but officers have consulted and continue to work with the emergency services to resolve any significant issues. As the School Street is a low traffic zone and unauthorised vehicles will not be able to enter the area, Emergency Services may find the School Streets provides unhindered access for their vehicles which would be a **positive impact**.

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

**Describe the Mitigating Action**

If required a temporary permit can be requested.

## Equalities Analysis Assessment

<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>Neutral impact</b>
<b>Describe the Impact</b>
There is no clear evidence, data or rationale to expect that these works will have a differential impact on people with this characteristic.
<b>Alternatives and mitigating actions which have been considered in order to reduce negative effect:</b>
<b>Describe the Mitigating Action</b>
Not applicable.

### 4. Human Rights<sup>2</sup>

#### 4a. Does your proposal impact on Human Rights as defined by the Human Rights Act 1998?

Articles 1 and Article 8 of the Protocol to the European Convention of Human Rights (which are enshrined in the 1998 Act) confirm as follows

Article 1 "Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and the general principles of international law. The preceding provisions shall not, however, in any way impair the right of the state to enforce such laws as it deems necessary to control the use of property in accordance with the general interest...."

Article 8 "Everyone has the right to respect for his private and family life, his home and his correspondence. There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country. For the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others'.

To the extent that Articles 1 and/or 8 applies it is considered that the decision to traffic orders to create school streets is justified in the public interest given the anticipated positive outcomes outlined above.

#### 4b. Does your proposal impact on the rights of children as defined by the UN Convention on the Rights of the Child?

Yes, the proposed School Streets scheme specifically considers the impact on children and the impact on their physical safety and well-being and aims to improve their well being.

#### 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?

Yes, the proposed School Streets scheme does impact on some persons with disabilities who are not entitled to an exemption. It is considered that this is justified in the public interest given the anticipated positive outcomes outlined above.

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

## Equalities Analysis Assessment

### 5. Conclusions and Data

#### 5a. Conclusions

There are not expected to be any significant negative impacts on any group. It is anticipated that there will be positive impacts for children. Any negative impacts will be closely monitored and any on-going adverse impacts will be taken into account as appropriate in the decision on whether to make the scheme permanent or not.

#### 5b. 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.

- Data available from Office of National Statistics
- Evidence from other School Streets installations - <http://schoolstreets.org.uk/resources/>
- Evidence from research of School Street installations - <https://www.napier.ac.uk/about-us/news/school-street-closures>
- Evidence from evaluation of School Streets - <https://content.tfl.gov.uk/school-streets-evaluation-report-website.pdf>
- Evidence from air quality monitoring report - <https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/school-streets-air-quality-study>

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

Action	Outcomes	Success Measures	Timescales/ Milestones	Lead Officer (Contact Details)
Set up and communicate a feedback mechanism	Allow residents, businesses and stakeholders to report any issues that may impact an equalities group	<ul style="list-style-type: none"> <li>• School Streets inbox open and receiving emails</li> </ul>	Set up in August 2020 and in place for the duration of the scheme	Transport Planning Service
Letter regarding scheme to all properties regarding statutory consultation on TRO	Allow residents to consider alternative modes or routes for journeys, advise deliveries etc.	<ul style="list-style-type: none"> <li>• Delivery of letters</li> </ul>	Prior to making of new TRO	Highways
Provide permits to allow access for residents, business vehicles within the scheme and others who are exempt	Exempt vehicles have access to the School Street at all times	<ul style="list-style-type: none"> <li>• Residents receive instructions on how to apply for a permits in their information pack</li> <li>• Residents and others apply for permits via an online portal (LBE website). These</li> </ul>	From August 2021 for the duration of the scheme	Transport Planning Service /Parking Services

## Equalities Analysis Assessment

		are processed within 5 working days		
Walk to school maps are provided, if available. And active travel is promoted by the schools	Families have information on walking routes and suitable Park & Stride locations. Schools are engaged in STARS programme	<ul style="list-style-type: none"> <li>• PDF versions of the maps are provided for schools to share with families on their websites</li> <li>• Schools achieve or maintain STARS accreditation</li> </ul>	Maps available on Ealing Grid for Learning STARS accreditation is approved in Summer term	Transport Planning Service
Implement monitoring regime	Scope, obtain or survey items for monitoring (mode of travel data, photographic evidence before/after.) Seek feedback from school community on implementation of the scheme	<ul style="list-style-type: none"> <li>• Collection of data</li> <li>• Collection of feedback</li> </ul>	All data to be collected prior to final review report. Ongoing feedback collected via dedicated mailbox	Transport Planning Service
Use of industry standards and guidelines in design	Minimise any negative impacts on any equalities group	<ul style="list-style-type: none"> <li>• Undertake audit</li> </ul>	2 months after TRO published	Highways
Consult with Emergency Services	Ensure awareness of the School Streets and mitigate any concerns. Continual monitoring on operations	<ul style="list-style-type: none"> <li>• No on-going concerns raised by emergency services</li> </ul>	In accordance with statutory timeframes and prior	Highways
Consider all impacts on equalities group as part of the design	Avoid adding to/ removing elements which specifically and significantly negatively impact on any equalities group	<ul style="list-style-type: none"> <li>• Undertake audit</li> </ul>	2 months after installation	Highways
<b>Additional Comments:</b>				
None.				

**7. Sign off:** *(All EAA's must be signed off once completed)*

## Equalities Analysis Assessment

Completing Officer Sign Off:	Service Director Sign Off:	<i>HR related proposal (Signed off by directorate HR officer)</i>
Signed:	Signed:	Signed:
Name (Block Capitals): CHRIS COLE Date: XX	Name (Block Capitals): DIPTI PATEL Date: XX	Name (Block Capitals):  Date:
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:

- 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.