

Equalities Analysis Assessment	
EAA Title	West Ealing North Low Traffic Neighbourhoods - January 2021 Update
Please describe your proposal?	Implementation of an experimental Low Traffic Neighbourhood at West Ealing North using temporary materials
Is it HR Related?	No
Corporate Purpose	Officer decision

1: Introduction
<p>This Equalities Analysis Assessment (EAA) is for the West Ealing North Low Traffic Neighbourhood (LTN) an update to the EAA published with the Officer Decision which recorded the making of the Experimental Traffic Order (ETO) on 23rd October 2020.</p> <p>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 of a new ETO being created as changes are being made to the operation] of the LTN, namely:</p> <ul style="list-style-type: none"> • An exemption for blue badge holders within the LTN that they live (subject to registration) from camera enforcement, to enable them to drive through their LTN road closures. • An exemption for Council authorised vehicles transporting people with a mobility impairment where there is camera enforcement. • Bollards, with camera enforcement, are replacing the current design <p>In addition, following feedback, there is now an individual EAA for each LTN, rather than one EAA covering all 9 LTNs. This shall enable the Council to have due regard to all relevant material for a specific LTN through the decision-making process and prior to the consideration of any final Traffic Order.</p>

2: Proposal Summary information
<p>2a: What is the Scheme looking to achieve? Who will be affected?</p> <p>An LTN is a residential area, bordered by main roads (roads that are often used by buses, lorries and non-local traffic), where "through" motor vehicle traffic is discouraged or removed, while allowing access for pedestrians and cyclists. To close junctions, features such as cameras, planters and/or bollards are placed strategically to remove through routes whilst still allowing vehicle access to all properties for residents living within the LTN. LTNs make it harder or impossible to drive through the area from one main road to the next. LTNs are intended to reduce through traffic or "rat-running" through residential neighbourhoods by closing roads to vehicular through traffic. By reducing traffic in residential neighbourhoods this encourages walking and cycling.</p> <p>More information is available at: https://londonlivingstreets.com/low-traffic-liveable-neighbourhoods/</p> <p>A plan of the area of this LTN is attached as appendix B.</p> <p>All properties within the LTN will maintain access for vehicular traffic (e.g. residents' or a business's vehicles and deliveries), however, the route may be less direct than previously, depending upon the origin/destination.</p> <p>The schemes are being implemented using funding from the London Streetspace Plan, which is a central Government fund (administered by TfL) in response to the COVID emergency. There is a concern from Government that vehicular based travel is expected to increase as lockdown restrictions</p>

eases and public transport remains at reduced capacity due to social distancing. This would result in more traffic looking to rat run to avoid queues on main roads.

LTNs form part of the council's approach to make Ealing a great and healthy place to live, as by strategically closing a series of residential streets it makes the journeys for those that were using the street as a cut through, more difficult. Evidence from [Waltham Forest who introduced several LTNs saw that around 15 percent of non-local](#) traffic from LTNs disappeared entirely as the drivers adjusted their routes and behaviours. This led to a reported 90% reduction in household exposure to nitrogen dioxide after Waltham Forest Council installed over 40 filters in residential areas.

Schemes are being implemented using temporary materials and utilise an Experimental Traffic Order (ETO) which can stay in force for up to 18 months prior to the decision on whether to make them permanent or not. This allows for monitoring of impacts and changes to the scheme to be made where adverse impacts become apparent.

2b: What will the impact of your proposal be?

The biggest impact will be on the residents and businesses within or in close proximity to an LTN, although those drivers from other areas that use the residential roads as a through road, short cut or "rat run" will also be impacted.

Whilst access to all properties will be maintained, the impact will be in terms of potential additional time required to make a vehicular journey. This is expected to be in the form of additional time taken to complete journeys as some residents may need to take a longer route if their destination is on the far side of the LTN. In addition, there may be some minor delays from some additional traffic that is expected on the boundary roads in the first instance as drivers get used to the new road layout and the scheme "settles in". This is anticipated to be approximately 5 to 10 minutes in normal circumstances. Walking and cycling journeys will not be affected.

There is concern that by reducing routes available that the boundary roads will not be able to cope with the additional traffic. However, evidence from LTNs previously implemented elsewhere shows that after a settling in period, traffic disperses and the additional volumes of traffic on the boundary roads is small. <https://www.livingstreets.org.uk/media/3844/lcc021-low-traffic-neighbourhoods-detail-v9.pdf>

According to Sustrans (a charity dedicated to promoting walking and cycling), Low Traffic Neighbourhoods have also been shown to have other impacts including:

- increase physical activity through more walking and cycling
- benefit local businesses
- create new public space
- deliver improvements to air quality

<https://www.sustrans.org.uk/for-professionals/infrastructure/an-introductory-guide-to-low-traffic-neighbourhood-design/an-introductory-guide-to-low-traffic-neighbourhood-design-contents/design-guide/all/1-making-the-case-for-a-low-traffic-neighbourhood>

Improving air quality will have positive impacts for all residents in the LTN areas.

Access will be maintained for emergency vehicles through Automatic Number-plate Recognition (ANPR) cameras and with the use of "drop down bollards" opened with a standard key that emergency service vehicles carry. Keys have been offered to the emergency services to ensure all vehicles have keys. The emergency services have been consulted and some schemes have been updated based on their feedback including using cameras instead of bollards at some junctions.

Consideration of any potential impacts on protected groups are embedded in the Council's design processes for Highways schemes. The qualified engineers who undertook the design use National and Regional guidance and standards including the Manual for Streets (DfT), Traffic Signs

Regulations and General Directives (DfT) and Streetscape Guidance (TfL). Should any significant impact on any protected group become apparent, then a more detailed analysis would be initiated.

3: Impact on Groups having a Protected Characteristic

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

Positive, no additional impact and negative impact

Describe the Impact

CONSTRUCTION

Construction is using temporary materials, therefore, is quick (usually within a single day per LTN) and involves no significant noise or obstruction. The impact is, therefore considered to be **neutral**.

No further intrusive construction is required as a result of the proposed changes

OPERATION

If a particular person 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 may generate a **low negative impact** initially. This is expected to be in the form of additional time taken to complete journeys as some residents may also need to take a longer route if their destination is on the far side of the LTN in order to avoid the road closures. The exemption for blue badge holders to register one vehicle¹ within the LTN they live, will reduce the number of people impacted and mean that any time impact will be reduced even further for these people.

In addition, there may be some minor delays from some additional traffic that is expected on the boundary roads, in the first instance, as drivers get used to the new road layout and the scheme "settles in". This is anticipated to be approximately 5 to 10 minutes in normal circumstances. Walking and cycling journeys will not be affected.

Once the scheme has settled in, any negative impact is expected to reduce as traffic patterns return towards the previous levels as expected, therefore, for some journeys it is expected to be **low negative** and others are expected to have **no additional impact** depending upon the origin/destination of the journey and whether the quickest route prior to implementation was through a road closure. However, it needs to be re-stated that access to all residents will continue even after the road closures so impact is limited. No buses are routed through this LTNs.

The impact on children is expected to be **low 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 this LTNs.

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.

Some residents within an LTN require carers or similar external help. An unknown number of carers will need to change the route of their journey to/from the residence and it may be longer than before implementation, however access to all properties is maintained, so the impact is not expected to be significant. The exemption for Council authorised vehicles transporting people with a mobility impairment will reduce the number of people on whom there is an impact.

Known Establishments within this LTN

The following is a list of establishments within this LTN upon which there may be an impact.

- Boots Pharmacy, Broadway

¹ The process for registering vehicles will be kept under review

- Superdrug Pharmacy, Broadway
- Insights ESC Ltd, Alexandria Road
- Ealing Centre For Independent Living, Bayham Road
- Grosvenor House Surgery, Broadway
- St John's Primary School, Green Man Gardens
- Busy Bees at West Ealing Day, Green Man Passage

Note: it is recognised that additional establishments may also exist.

Describe the Mitigating Action

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.

Continue to liaise with emergency services to identify any issues.

Ensure residents are aware of the proposal in advance so that alternative arrangements (e.g. new routes) are known.

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 activities².*

Positive, negative and no additional impacts

Describe the Impact

CONSTRUCTION

Construction is using temporary materials, therefore, is quick (usually within a single day per LTN) and involves no significant noise or obstruction. The impact is, therefore considered to be **neutral**.

No further intrusive construction is required as a result of the proposed changes

OPERATION

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

If a particular person 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 finished scheme may generate a **low negative impact** initially. This is expected to be in the form of additional time taken to complete car journeys as there may be some minor delays as drivers get used to the new road layout and the scheme "settles in". The exemption for blue badge holders to register one vehicle³ within the LTN they live, will reduce the number of people impacted and mean that any time impact will be reduced even further for these people.

Once the scheme has settled in, the impact is expected to reduce as traffic patterns return towards the previous levels as expected, therefore, for some journeys it is expected to be **low negative** and others is expected to be **no additional impact** depending upon the origin/destination of the journey and whether the quickest route prior to implementation was through a road closure. However, it needs to be re-stated that access to all residents will continue even after the road closures, so impact is limited.

² 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.

³ The process for registering vehicles will be kept under review

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.

Some residents within an LTN require carers or similar external help. An unknown number of carers may need to change the route of their journey to/from the residence and it will be longer than before implementation, however access to all properties is maintained, so the impact is not expected to be significant. The exemption for Council authorised vehicles transporting people with a mobility impairment will reduce the number of people on whom there is an impact.

Known Establishments within this LTN

The following is a list of establishments within this LTN upon which there may be an impact.

- Boots Pharmacy, Broadway
- Superdrug Pharmacy, Broadway
- Ealing Centre For Independent Living, Bayham Road
- Grosvenor House Surgery, Broadway

Note: it is recognised that additional establishments may also exist.

Describe the Mitigating Action

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.

Ensure residents and establishments are aware of the proposal in advance 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.*

No additional 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.

Known Establishments within this LTN

There are no known establishments within this LTN upon which there may be an impact, although it is recognised that some may exist.

Describe the Mitigating Action

Not applicable.

RACE: <i>A group of people defined by their colour, nationality (including citizenship), ethnic or national origins or race.</i>
Positive impact
Describe the Impact
<p>According to Public Health England, there has been clear evidence that the BAME population has been more adversely affected by Covid-19 than the general population as a whole. https://www.gov.uk/government/publications/covid-19-understanding-the-impact-on-bame-communities . There are a number of underlying reasons attributed to this including health, greater poverty and greater percentages than average as key workers who have continued to travel to their workplace during the Covid-19 pandemic.</p> <p>Improvements in air quality and enhancing the ability of people to walk and cycle safely may therefore have a slight positive impact on the health of the BAME population.</p>
Known Establishments within this LTN
There are no known establishments within this LTN upon which there may be an impact, although it is recognised that some may exist.
Describe the Mitigating Action
Not applicable.

RELIGION & BELIEF: <i>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.</i>
Low Negative Impact
Describe the Impact
<p>Some of the LTNs contain religious buildings. Therefore, if an attendee 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 finished scheme may generate a low negative impact initially in the form of a slight increase in the time taken to get to the religious building by car depending on the origin of the journey. However, this is not specific to any religious belief so is covered more fully in the disability section of this EEA.</p>
Known Establishments within this LTN
<p>The following is a list of establishments within this LTN upon which there may be an impact.</p> <ul style="list-style-type: none"> • Serbian Orthodox Church, Green Man Passage • Jamia Masjid Aysha, Ecclestone Road • Dean Hall Christian Church, Williams Road • West London Islamic Centre, Brownlow Road <p>Note: it is recognised that additional establishments may also exist.</p>
Describe the Mitigating Action

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.

Ensure users of religious buildings are aware of the proposal in advance so that alternative arrangements (e.g. new routes) are known.

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

No additional 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.

Known Establishments within this LTN

There are no known establishments within this LTN upon which there may be an impact, although it is recognised that some may exist.

Describe the Mitigating Action

Not applicable.

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

No additional 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.

Known Establishments within this LTN

There are no known establishments within this LTN upon which there may be an impact, although it is recognised that some may exist.

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.*

Low Negative impact

Describe the Impact
This group may have a greater reliance on the car due to some potential reduced mobility issues. If a pregnant woman is wholly or mostly dependent on car or vehicular travel the operation of the finished scheme may generate a low negative impact initially. This is expected to be in the form of additional time taken to complete car journeys as there may be some minor delays as drivers get used to the new road layout and the scheme “settles in”.
Known Establishments within this LTN
The following is a list of establishments within this LTN upon which there may be an impact. <ul style="list-style-type: none"> • Boots Pharmacy, Broadway • Superdrug Pharmacy, Broadway • Grosvenor House Surgery, Broadway <p>Note: it is recognised that additional establishments may also exist.</p>
Describe the Mitigating Action
Impacts will be closely monitored and any on-going adverse impacts will taken into account as appropriate in the decision on whether to make the scheme permanent or not. Ensure residents are aware of the proposal in advance so that alterative arrangements (e.g. new routes) are known.

MARRIAGE & CIVIL PARTNERSHIP: <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>
No additional 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.
Known Establishments within this LTN
The following is a list of establishments within this LTN upon which there may be an impact. <ul style="list-style-type: none"> • Serbian Orthodox Church, Green Man Passage • Jamia Masjid Aysha, Eccleston Road • Dean Hall Christian Church, Williams Road • West London Islamic Centre, Brownlow Road <p>Note: it is recognised that additional establishments may also exist.</p>
Describe the Mitigating Action
Not applicable.

4: Human Rights⁴

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 introduce experimental traffic orders to create LTNs 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?

No

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 LTN schemes have considered the accessibility issues for persons with disabilities to live independently. This includes the identification and elimination of obstacles and barriers to accessibility.

5: Conclusions and Data

5a: Conclusions

There are not expected to be any significant impacts on any groups with protected characteristics. All impacts will be closely monitored during the trial period 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 LTN installations: <https://www.livingstreets.org.uk/media/3843/lcc021-low-traffic-neighbourhoods-intro-v8.pdf>

⁴ For further guidance please refer to the Human Rights & URNC Guidance on the Council Equalities [web page](#).

6: Action Planning:

(What are the next steps for the proposal please list i.e. when it comes into effect, when mitigating actions⁵ will take place, how you will measure impact etc.)

Action	Outcomes	Success Measures	Timescales	Lead Officer
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"> • COVID transport inbox open and receiving emails • Operate an online digital engagement platform 	<ul style="list-style-type: none"> • Immediately • Immediately 	Transport Planning Service
Letter regarding scheme to all properties	Allow residents to consider alternative modes or routes for journeys, advise deliveries etc.	<ul style="list-style-type: none"> • Delivery of letters 	Prior to making of new ETO	Highways
Implement monitoring regime	Scope, obtain or survey items for monitoring (e.g. traffic volumes, air quality, etc.)	<ul style="list-style-type: none"> • Collection of data, e.g. traffic data, AQ data, surveys of residents. Details to be published on LBE website when finalised. 	All data to be collected by end of ETO consultation and prior to any final decision	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"> • Undertake audit 	2 months after ETO published date	Highways
Consult with Emergency Services	Ensure awareness of the LTNs, mitigate any concerns, change designs if required. Continual monitoring on operations	<ul style="list-style-type: none"> • No on-going concerns raised by emergency services 	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"> • Undertake audit 	2 months after installation	Highways

Additional Comments:

None.

7: Sign off

Completing Officer Sign Off:	Service Director Sign Off:
Signed:  Name (Block Capitals): Chris Cole Date: 15/1/21	Signed: Name (Block Capitals): Dipti Patel Date: XXX

Appendix A: 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.

Appendix B: Plan of LTN

ACCESS

-  Access from Drayton Green Road
-  Access from Broadway
-  Access from Broadway and Drayton Green Road

KEY

-  Permitted direction of travel
-  No access except for cyclists and pedestrians - Using Planters and Bollards
-  No right hand turn on to Broadway
-  No access except for cyclists and pedestrians - with mobile enforcement vehicles
-  School street barrier locations - managed by school staff
Hours of operation St John's Primary : 8.30 - 9.20am & 2.45 - 3.30pm
- School street open to pedestrian and cyclists
-  One-way between Connaught Rd and Felix Rd - with mobile enforcement vehicles
-  One-way
-  Cycle parking available at station

LTN 20 West Ealing – North



CONTACT US

You can email us your support or objection to TrafficNotices@ealing.gov.uk, or post them to the Highways Service, Perceval House, 14-16 Uxbridge Road, W5 2HL.

All local streets will have complete motor access for local uses, such as residents accessing their property, visitors, waste collection, emergency services and deliveries. Although in some cases a different route may need to be taken

