

## Equality Impact Assessments - equality through public services



### Our approach

Equality impact assessments (EIAs) are our chosen way for working out the effect our policies, practices or activities (the word activity will be used throughout this form as an umbrella term) might have on different groups before we reach any decisions or take action. They are an important service improvement tool, making sure that our services are as effective as they can be for everyone Camden serves. They also help to prevent us from taking action that might have outcomes we did not intend.

It is essential that you start to think about the EIA process before you develop any new activity or make changes to an existing activity. This is because the EIA needs to be integral to service improvement rather than an 'add-on'. If equality analysis is done at the end of a process it will often be too late for changes to be made.

If a staff restructure of organisational change is identified as necessary following the review of an activity then an EIA needs to be completed for **both** stages of the process, i.e. one when the activity is reviewed and one when the restructure or organisational change is undertaken .

Please read the council's EIA guidance, ['Equality impact assessments – equality through public services, a step-by-step guide'](#), before beginning the EIA process.

### Stage one - what is being analysed and who is responsible for the equality impact assessment?

This section should be completed to help you plan how you will analyse an activity.

Name of the activity being analysed	West End Project proposals
Service and directorate responsible	Transport Strategy, Culture and Environment
Names and posts of staff undertaking the assessment	Natasha Brown, Principal Transport Planner Jacqueline Saunders, Principal Transport Planner
Date assessment completed	December 2014
Name of person responsible for sign off of the EIA	

### Stage two - planning your equality analysis

This section of the form should be completed when you are developing your proposals for assessing the activity.

The information you will need to collect should be proportionate to the activity that you are looking at. A small change in policy, for example, does not need to be supported by the same amount of evidence and analysis as a major change in service provision.

#### Outline the activity being assessed

*Include:*

- *A brief description of the current or proposed activity;*
- *An outline of any proposed changes and the reasons for these;*
- *The groups that are likely to be affected; and*
- *The desired outcomes.*

#### Introduction

The proposed activity, the West End Project proposals, involves traffic and public realm improvements in the Tottenham Court Road, Gower Street / Bloomsbury Street and New Oxford Street area. The proposals cover a significant part of the Bloomsbury Ward and a small part of the Holborn and Covent Garden Ward.

The proposals cover physical and temporal access to the streetscape. Therefore pedestrians, including wheelchair users and people who have pushchairs, as well as road user groups including cyclists, bus users, car users, taxi drivers and passengers are likely to be affected by the proposals. Residents who live in the areas or nearby may also be affected by some temporary noise/disruption during the implementation phase. Although the impact will be universal to all groups, some aspects of the proposals could have a greater impact on following protected groups: **age** and **disability**.

This Equality Impact Assessment (EIA) is being carried out on the West End Project in order to give due regard to the potential positive and negative impacts of the proposals on groups with protected characteristics, as defined by the Equality Act 2010, and as part of the Council's commitment to reducing inequality, which is reflected in both the Camden Plan and the outcomes of Camden's Equality Taskforce. The assessment will set out actions that will be taken to mitigate against, or minimise, any negative impacts.

#### Background

The West End Project proposed changes include:

##### Tottenham Court Road (TCR)

- Make Tottenham Court Road two-way for buses and cyclists only (from 8am-7pm, Monday to Saturday) with local access for cars, taxis and loading on short sections of Tottenham Court Road via side roads.
- Wider pavements with trees and safer pedestrian crossings including new diagonal crossings at the junction of Tottenham Court Road and Oxford Street.
- New public space between Percy Street and Windmill Street with trees and seats, and improvements to Whitfield Gardens, including seating, planting and restoring the mural.

- Raise the road to the same level as the pavement, in certain areas, to slow traffic.
- Bus passengers would be able to arrive and leave from Tottenham Court Road.
- Improved lighting.

### Gower Street

- Make Gower Street and Bloomsbury Street two-way for all vehicles.
- “Stepped track” cycle lanes (similar to those on Old Shoreham Road in Brighton) in both directions (which would require some sections of pavement to be slightly narrowed).
- De-clutter pavements and provide safe and convenient pedestrian crossings.
- Move all bus routes to Tottenham Court Road.
- Raise the road to the same level as the pavement, in certain areas, to slow traffic.

### New Oxford Street

- Provide safe and direct pedestrian crossings.
- Raise the road to the same level as the pavement, in certain areas, to slow traffic and remove unnecessary signs and railings.

### *Public spaces*

- A new park on Alfred Place, new plaza for St Giles - next to Centre Point, and a new public space at Princes Circus - the junction of Shaftesbury Avenue and High Holborn.
- Improved public spaces on Tottenham Court Road - Whitfield Gardens and "Windmill Square" (between Percy Street and Windmill Street) – and on Huntley Street.
- “Mini-parks” would be created at Bedford Avenue, Bayley Street and Capper Street. These streets would be closed to all traffic (except cyclists) at the Tottenham Court Road end, with new seating, cycle parking and trees.

### *Cycling*

- An additional thirteen streets would allow cycling in both directions to improve routes through the area and encourage people to cycle. The two-way cycling streets would be: Gower Place, Gower Street/Bloomsbury Street, Huntley Street, Warren Street, Tottenham Street, Store Street, Ridgmount Gardens, Bedford Avenue, Bedford Square, Endell Street, Tottenham Court Road, High Holborn (part) and Shaftesbury Avenue.

### *Buses*

- Quicker and more reliable bus journeys for most bus routes by moving all bus routes from Gower Street to Tottenham Court Road, so that bus passengers would be able to arrive and leave from Tottenham Court Road.

### *Taxis and general traffic*

- Moving some taxi ranks and relocating other ranks.
- Local access for cars, taxis and loading would only be allowed on short sections of Tottenham Court Road (via side streets) from 8am to 7pm Monday to Saturday.
- Charing Cross Road northbound, between Cambridge Circus and St Giles Circus, would be for buses and cyclists only (except for access via side streets).
- Bedford Avenue, Bayley Street and Capper Street would be closed at their junctions with Tottenham Court Road to all traffic (except cyclists).
- There would be less traffic in the area as a whole but some streets would see an increase in traffic.

### *Parking and loading*

- Some parking spaces would be removed from side streets or relocated to provide areas for loading, taxi ranks and cycle parking including five residents' bays, three Blue Badge disabled bays and 57 pay and display bays. Parking surveys show that their use is very low.
- Loading hours would be altered across the area.

### **Desired outcomes**

It is anticipated the West End Project would result in improvements to the traffic and public realm in the Tottenham Court Road, Gower Street / Bloomsbury Street and New Oxford Street area, resulting in the following benefits:

- Reduced traffic dominance
- Increased road safety
- Improved air quality
- Shorter bus journey times
- Improved bus journey time reliability
- Wider pavements and reduced street clutter providing more space for powered wheelchairs and electric scooters
- Improved pedestrian crossings
- Better lighting reducing crime and fear of crime
- Improved public spaces helping to promote social inclusion and liveability.

The desired outcomes of the West End Project are aligned to the key objectives of Camden's Transport Strategy by:

- Reducing traffic to improve air quality
- Improving road safety for the most vulnerable road users; pedestrians and cyclists
- Encouraging sustainable healthy travel
- Developing high quality accessible public space and street and
- Supporting Camden's growth and regeneration, enhancing economic and community development.

The project aims to support the Council's strategic objective **to invest in our communities to ensure sustainable neighbourhoods** as set out in [The Camden Plan 2012-17](#).

### Gather relevant equality data and information

*Possible data and information you should include (with sources) are:*

- *If available, profile of service users and potential users / staff by protected groups:*
  - *age;*
  - *disability;*
  - *gender reassignment;*
  - *marriage and civil partnership;*
  - *pregnancy and maternity;*
  - *race;*
  - *religion or belief;*
  - *sex; and*
  - *sexual orientation.*

- Take up of services, by protected group if available;
  - Recommendations from previous inspections or audits;
  - Recent research from national, regional and local sources;
  - Comparisons with similar activities in other departments, councils or public bodies;
  - Information from VCS organisations to help gain an understanding of different protected groups;
- and
- Workforce equality data will be provided by your HR change adviser for organisational change / restructure EIAs.

Essentials has a range of online materials you can use. This includes [statistical data](#) and some of the [issues](#) protected groups face.

The Census 2011 provides some equality data on resident population in the Bloomsbury, Holborn and Covent Garden wards and so it is possible to make some assumptions on the impacts that the West End Project will have on groups with protected characteristics. However it is acknowledged that pedestrians and road users will also be affected by the proposals who are not residents in these areas and so other sources of information, including Taxicard and Freedom Pass data, have been collated and analysed to help inform this Equality Impact Assessment.

### Age

According to data from 2011 census:

- 16% of the population of Bloomsbury ward is under 16 and 14% is over 60.
- 16% of the population of Holborn and Covent Garden ward is under 16 and 14% is over 60.

The Camden average for the proportion of the population that is under 16 is 16% and over 60 is 15% and so the proportion of older residents in the West End Project area is slightly lower than the borough average. The proportion of under 16s in the West End Project area is in line with the borough average.

### Disability

From the 2011 census, 12% of the population of Bloomsbury ward self-reported as having an activity-limiting illness and 16% of the population of Holborn and Covent Garden ward. This compares with a Camden average of 14%. Across the whole project area, the proportion of disabled people is similar to the borough average.

Disabled people drive cars less and are less likely to have one in the household, but nonetheless the most common mode of transport for disabled people is a car driven by someone else (Disability Rights Commission 2003). Providing adequate parking for Blue Badge holders is appropriate locations is therefore important to ensure that disabled people can access the services and goods they need.

### Ethnicity

According to data from 2011 census:

The proportion of Black and Minority Ethnic (BME) groups in Bloomsbury is higher at 40.4% than the Camden average (33.7%).

### Bloomsbury

<b>All ethnic groups</b>	<b>10,892</b>	<b>100%</b>	<b>100%</b>
<b>White</b>	6,491	59.6%	66.3%
<b>Mixed/Multiple Ethnic Groups</b>	500	4.6%	5.6%
<b>Asian or Asian British</b>	2,712	24.9%	16.1%
<b>Black or Black British</b>	731	6.7%	8.2%

	Area No.	Area %	Camden %
<b>Other Ethnic Group</b>	458	4.2%	3.8%
<b>Black &amp; Minority Ethnic Groups<sup>1</sup></b>	4,401	40.4%	33.7%
<b>All Minority Ethnic Groups<sup>2</sup></b>	6,688	61.4%	56.0%

The proportion of Black and Minority Ethnic (BME) groups in Holborn and Covent Garden is also higher at 39.8% than the Camden average (33.7%).

### Holborn and Covent Garden

	Area No.	Area %	Camden %
<b>All ethnic groups</b>	<b>13,023</b>	<b>100%</b>	<b>100%</b>
<b>White</b>	7,839	60.2%	66.3%
<b>Mixed/Multiple Ethnic Groups</b>	746	5.7%	5.6%
<b>Asian or Asian British</b>	2,994	23.0%	16.1%
<b>Black or Black British</b>	990	7.6%	8.2%
<b>Other Ethnic Group</b>	454	3.5%	3.8%
<b>Black &amp; Minority Ethnic Groups<sup>1</sup></b>	5,184	39.8%	33.7%
<b>All Minority Ethnic Groups<sup>2</sup></b>	7,894	60.6%	56.0%

The Camden Transport Strategy states that BME groups are more likely to be living in poverty than white people. Information on employment and earnings show that BME people are generally less likely to be employed and, where they are employed, more likely to be in low paid occupations. Research supports the view that there are strong links between ethnicity and deprivation: the Prime Minister’s Strategy Unit, 2005 shows that ethnic minorities tend to live in more deprived areas in the UK, with particularly steep gradients in London. Deprivation particularly affects young people from the BME community, with unemployment rates among 16-24 year olds around three times higher than that for the white groups. Barriers to the transport network faced by BME groups will therefore parallel those from deprived areas, i.e. affordability, accessibility, and safety.

### Ethnicity and safety

We would expect that, as minority ethnic groups are more likely to live in deprived areas, there will be a similar relationship between ethnicity and road injury risk as that between deprivation and risk. Research by the London School of Medicine and Tropical Hygiene (2006) supports the fact that for almost all ethnic groups, injury risk is indeed higher for each group in more deprived areas compared to least deprived areas. However, the research also shows that for Black children it is almost the same, i.e., Black children do not appear to be protected from pedestrian injury risk by living in less deprived areas. This means that the relationship is far more complex and that BME communities cannot be considered as a homogenous group.

There are three key determinants of the relative risk of being injured as a pedestrian: the road environment (how many roads and junctions, the volume and speed of traffic etc.); an individual’s exposure to that environment; and individuals’ behaviour.

Data for 1996-2006 shows that ‘black Londoners have been on average 1.3 times more likely to be injured on the roads than ‘white’ Londoners’. Therefore there is some element of individual behaviour and exposure which is increasing risk among these groups. This can include, for example, different attitudes to taking risk and preferences for more outdoor leisure behaviour which may increase exposure among African and Caribbean groups. For example, the lack of safe and affordable access to play areas or sports centres may mean people socialise more on the street. Or children from single parent families may be travelling to school unaccompanied. On

the other hand, some cultures are stricter about letting younger people out alone, particularly girls.

**As Camden is culturally diverse, measures to address road safety among ethnic minority children should be sufficiently broad to avoid problematising the behaviour of certain groups. Therefore, as well as targeting actual behaviour, policy should aim to provide a safe physical environment for those behaviours, including safe areas to play and socialise.**

Information on road injury and ethnicity specifically relating to Camden is unavailable. Camden has been very successful in reducing casualties in borough roads over the last 10 years, and improving road safety continues to be a major objective for the Council. Improving road safety through engineering measures, traffic calming and speed management has immediate benefits for those most at risk and the local community while also benefiting the wider population. Through its Education, Training and Publicity Programme which aims to improve road safety, Camden also targets behaviour, particularly among those most at risk. Objective 5 in Camden’s Transport Strategy which aims to improve the public realms acknowledges that streets are places where people socialise and interact, dwell and enjoy in their own right.

TfL research also shows that BME Londoners are less likely than other groups to cycle. Safety is a major issue for people who don’t cycle, with some believing it is not safe because of careless motorists and busy traffic. The Camden Transport Strategy is committed to improving safety, especially for cyclists, through engineering measures and skills training, as well as promoting the benefits cycling to all groups.

Improvements to provision for walking and cycling would benefit BME groups and encourage more people from this protected group to cycle. The West End Project proposals would therefore have a positive impact on the ethnicity protected group.

**Sex/gender**

According to data from 2011 census:

**Bloomsbury**

	Area No.	Area %	Camden %
Male	5,686	52.2%	49.0%
Female	5,206	47.8%	51.0%

**Holborn and Covent Garden**

	Area No.	Area %	Camden %
Male	6,908	53.0%	49.0%
Female	6,115	47.0%	51.0%

There are more men than women in both Bloomsbury and Holborn and Covent Garden wards.

In Camden as a whole, there are more older women than older men, more boys than girls, while the working-age population is split 51/49 men to women (Communities and Inequalities, Final Report, Camden Council, 2010).

Results of Camden Talks survey show that both men and women rated road safety almost equally, with 36% of men and 35% of women saying it was a priority concern. However, in the case of women, this was their top priority, whereas for men 38% rated improvements to congestion as a priority.

### Deprivation

There are several issues affecting men's and women's use of the transport network. As described above, socio-economic factors have a major impact on choices. Women are generally at greater risk of poverty than men: more women work part-time than men and having dependent children has an impact on women's employment opportunities whereas there is no impact on men's. People in lone parent households are at much greater risk of poverty – and the majority of lone parents are women, and income disparities between men and women persist ([www.fawcettsociety.org.uk](http://www.fawcettsociety.org.uk)). The impacts of deprivation on women will therefore be more acute.

In March 2008 almost half the women's jobs were part-time compared with around one in six for men (Office of National Statistics 2010) and in September 2010, 75% more women than men were signed onto benefits. Moreover, analysis by the Fawcett Society predicts that current Government proposals for spending cuts will hit women far harder than men which will exacerbate this situation.

### Women's and men's travel needs

Research shows that women's multiple roles encompassing both work and family mean that their travel needs are far more complex than men.

Women are likely to be the chief carers of children, the elderly and sick and disabled. Therefore their journeys are likely to involve the care of an additional, dependent and vulnerable person: women make 67% of all escorting trips and are almost five times as likely as men to be making trips with children aged under 5. In addition women make 77% of all escorted trips to school (TfL: An Action Plan for Women, 2004).

Both distance to work and the amount of time available for work means many more women look for work close to home and take lower paid, part-time work than men: women comprise 70% of the workforce working part-time, and work trips are likely to be within the same borough (TfL: Action Plan for Women, 2004).

Because of these multiple roles, women's transport needs differ to men's. Their life styles comprise more complex and multiple journey chains. They often take shorter, more frequent and more local routes as well as commuter journeys, and are more dependent on buses and walking (Local Travel Demand Survey, TfL, 2007). Household survey data shows that women make 24% of their journeys by public transport and make 15% more trips than men, mainly due to a higher number of walking and bus trips. Women are therefore already heavy users of public transport.

### Safety and personal security

Perceptions of road safety and personal security can have a significant impact on the way that both men and women travel. Women's choice of how, and how far, to travel due to cost and time, may be further limited by fears about personal security. Women are four times more likely as men to be worried about safety at night (TfL: An Action Plan for Women, 2004). This will impact on their choices, and possibly restrict the places they visit and times of travel, or they may choose not to travel at all. Women are also more likely than men to say that fear of crime has an impact on their quality of life.

However, national crime data shows that men are far more likely to be the victims of violent crime in all age groups, but also that it is heavily concentrated among young men. Men living in England and Wales are more likely than women to be attacked by strangers: in 2009/10 79% of stranger violence affected men compared to 21% for women (Human Rights Commission, 2010).



Although women walk longer distances and more frequently, men are also more likely to be killed or seriously injured on all modes of transport, including as pedestrians (DfT, 2003).

Accurate information at bus stops is crucial for perceptions of safety for both men and women, for example to assess their waiting times or to ensure that they have not missed the last bus. Public spaces, including transport waiting areas and interchanges, should also be improved to reduce crime. They should also include improving transport waiting areas and interchanges, the presence and role of transport staff and managing anti-social behaviour, reducing waiting times for public transport, and improving lighting.

**Support for a more balanced transport network should address affordability, reliability and improving the pedestrian facilities. Improving safety and the perception of personal security is a priority for both men and women. Transport measures should also tackle perceived as well as actual road danger in order to address gender inequality.**

Objectives in the Camden Transport Strategy along with the three year programme of projects aim to address barriers associated with deprivation will also capture many of the same issues faced by both men and women, including safety, affordability, accessibility to local centres and employment opportunities (by bus and on foot). In addition, Camden Council works with TfL to highlight issues on public transport and bus services. As there are strong links between gender, ethnicity, age and deprivation, any steps taken to meet women’s transport needs will have many positive benefits for other groups such as black and minority ethnic groups, older people, disabled people and children.

**Religion/Belief**

According to data from 2011 census:

**Bloomsbury**

	<b>Area No.</b>	<b>Area %</b>	<b>Camden %</b>
<b>All (including Not Stated and No Religion)</b>	<b>10,892</b>	<b>100%</b>	<b>100%</b>
Christian	3,343	30.7%	34.0%
Buddhist	231	2.1%	1.3%
Hindu	267	2.5%	1.4%
Jewish	151	1.4%	4.5%
Muslim	948	8.7%	12.1%
Sikh	38	0.3%	0.2%
Other religion	72	0.7%	0.6%
No religion	3,049	28.0%	25.5%
Religion not stated	2,793	25.6%	20.5%

**Holborn and Covent Garden**

	<b>Area No.</b>	<b>Area %</b>	<b>Camden %</b>
<b>All (including Not Stated and No Religion)</b>	<b>13,023</b>	<b>100%</b>	<b>100%</b>
Christian	4,323	33.2%	34.0%
Buddhist	182	1.4%	1.3%
Hindu	166	1.3%	1.4%
Jewish	141	1.1%	4.5%
Muslim	1,995	15.3%	12.1%
Sikh	35	0.3%	0.2%
Other religion	64	0.5%	0.6%
No religion	3,128	24.0%	25.5%
Religion not stated	2,989	23.0%	20.5%

There is a higher proportion of Muslims in Holborn and Covent Garden than in the borough as a whole, but a lower proportion in Bloomsbury.

The Camden Transport Strategy EqIA notes that many of the issues associated with ethnicity also apply to faith. While much of the research does in fact group these two equalities groups together, religion is considered a more defining characteristic for some minority 'ethnic' groups (Camden: Census Fact Sheet 2001) For many, religious affiliation is far more important than ethnicity.

Camden is also home to wide range of other faiths including Christian, Muslim, Sikh, Jewish, Hindu and Buddhist. The largest faith population is Christian at 34% of the population. Muslims comprise the second largest faith group. In 2011, 12.1% people living in Camden classified themselves as Muslims. Muslims appear to be particularly disadvantaged across a number of indicators compared to other faith groups and the borough average, for example in unemployment, without qualifications and suffering from long-term illness.

For many faiths such as Orthodox Judaism and Sikhism, dress can be a very obvious indicator of faith and therefore likely to attract attention, including hate crime and anti-social behaviour.

Religious observance may affect when and where people travel. For example, some Jewish people cannot drive on Saturdays, and places of worship and faith based schools are major destinations for large populations from different groups, particularly on certain dates and at certain times of the day. It is therefore important that routes to and around these destinations are safe.

### **Car ownership**

80% of the households in Bloomsbury ward do not have access to a car and 75% of the households in the Holborn and Covent Garden ward. This is significantly higher than the Camden average of 61% and supports the objectives of the project to improve the environment for walking, cycling and public transport use.

### **Taxicard and Freedom Pass data**

The London Taxicard scheme provides subsidised taxi transport for people who have serious mobility or visual impairment and who have difficulty using public transport.

There are two Freedom Passes; one for people aged 64 or above and one for disabled people under 64. The Freedom Pass allows people free travel across London and free local bus journeys nationally.

The Camden Transport Strategy Equalities Impact Assessment states that, on the whole, older people are less likely to travel than younger people; the number of journeys made declines with age and the trips get shorter, due to changing needs, income and disability. Older people's travel purposes also differ from younger people, mainly due to retirement from work. Older people are also more dependent on public transport and walking, particularly women – who also comprise the majority of older people. Therefore transport strategies should address improvements to the walking environment and public transport.

For older people in Camden, transport is one of the biggest issues. Reliable and accessible transport was often cited as a crucial element for quality of life, enabling people to visit friends and families and take part in activities. The Blue Badge, Freedom Pass and Taxicard schemes were appreciated by many as a lifeline (London Borough of Camden: Older People's Plan, 2008). There were calls for better parking solutions for people's family and visiting carers and also for accessible transport services at night so that people could take part in evening activities.

The quality of public transport provision, and particularly the buses, was also cited as a major concern. However there was also recognition that Camden is privileged to have numerous transport options, so that people can get around the borough.

A study entitled, “Understanding and Satisfying Older People’s Travel Demand”, (Feng Ming Su, PhD. Department of Civil and Environmental Engineering, Imperial College, University of London 2007), analysed the effects of travel time and travel cost on older people’s mode choice. The study found that for older people, travel cost has bigger effects than travel time. This implies that for older people, they have more time and less money, so they would choose cheaper modes and care less about longer travel times.

The study also points out that taxi is an expensive transport mode, so for older people who are generally not better off than younger people, the percentage using a taxi is the highest for people who are older than 75. This could be because the Taxicard scheme provides a subsidy for some older people in London, or it could also be because older people have no other choice when they need a car but cannot drive and there are no friends or relatives to help. Especially for shopping, where there are loads generated, older people would prefer a car, in which case a taxi could satisfy this requirement.

It is primarily the bus stop density that encourages older people to use public transport more frequently whereas the bus service frequency does not appear to be of the same significance.

The Freedom Pass and Taxicard usage data below supports the study above in showing that older and disabled people use buses more often than taxis.

Indeed, 9.3 million public transport trips were made by Camden residents with an older person’s freedom pass in 2012/13 (the latest available data from Transport for London). Of these 7.1 million (76%) were made by bus over other forms of public transport. For disabled people under the age of 64, 2.8 million public transport trips were made by Camden residents registered for the pass, of which 2.2 million (79%) were made by bus. The bus is clearly an important transport mode for older and disabled people and improvements to bus stop accessibility, bus journey times and reliability would provide significant benefits for people that rely on them.

According to Taxicard usage data to date for 2014/15, the average number of trips made per month by Camden residents is 4,023, making the number of trips per year approximately 48,000.

The volume of trips made by Taxicard users is clearly far lower than the number of trips made by Freedom Pass users (the ratio is 1:200) and therefore although the lack of access to some parts of TCR to taxis might cause problems for some disabled and older people, the improvements to bus services would benefit a far larger number of disabled and older people.

### Consultation and engagement

Consider and include the following types of information:

- Results of any past consultation and engagement activities broken down by protected groups (if available) - sources could include, complaints, mystery shopping, survey results, focus groups, meetings with residents;
- National sources of data – statutory consultations such as national surveys may provide useful information;
- Any people you have consulted with in the process of developing this activity and what their views were;
- The potential barriers to participation for the different protected groups and possible ways to overcome these; and
- For organisational change / restructure EIAs include the results of any consultation or meetings with staff or trade unions.

A public consultation on the West End Project proposals was undertaken between 9 June and 1 August 2014. Information on protected groups was not collected as part of the consultation, with the exception of disability as it was considered that the proposals did not have an adverse impact on the other protected groups unless those people were disabled. Of the 1357 people that responded to the consultation, 3% said they did consider themselves to be disabled, 47% said they did not and 50% did not answer the question.

The public consultation on the West End Project showed that 58% of people were against proposals to restrict taxis on Tottenham Court Road due to reducing access for older people, disabled people and people with heavy shopping as well as concerns there would be more taxis on side streets.

Other organisations consulted include Guide Dogs for the Blind, Royal National Institute of Blind People, Disability In Camden, Visually Impaired in Camden, Camden Carers' Voice and Transport for All.

Of these organisations, Transport for All was the only one that responded and expressed the concern that Tottenham Court Road could become a no-go zone for people with reduced mobility. They also asked for exemptions to the restrictions for Blue Badge holders.

Camden's Mobility Forum were also consulted and were concerned about access to the UCLH sites being impeded and Taxicard journeys taking longer or being more expensive.

### Have you identified any information gaps?

If there are gaps in equality information for some protected groups identify these in this section of the form and outline any steps you plan to take to fill these gaps. Consider:

- Any relevant groups who have not yet been consulted or engaged;
- Whether it is possible to breakdown existing data or consultation results by different protected groups;
- Other sources of data – e.g. CIPFA, government websites, camdendata.info;
- Camden's [online materials](#) for each protected group; and
- If you are conducting an organisational change / restructure EIA and there are data gaps consider asking affected staff to update their details on e-HR and to raise any equality issues with you.

Any proposals to fill gaps in information should be noted in the 'planning for improvement' section of this

## Appendix J: Equality Impact Assessment

*form.*

Although there are gaps in the information available, such as there is no origin and destination data for Freedom Pass trips in order to compare the numbers of people travelling to Tottenham Court Road by bus and taxi, it would not be possible to gather this information easily or at a reasonable cost.

Data on sexual orientation, marriage and civil partnership, pregnancy and maternity is also unavailable as these questions are not included in the census, and there are no other sources of this data.

### Stage three - analysing your equality information and assessing the impact

This section of the EIA should be completed when you are reviewing this activity and considering different options for future delivery.

Analysing the evidence outlined above, could the activity have a negative or positive impact on protected groups?

*The types of questions you should consider include:*

- *Does take up of the activity differ between people from different protected groups?*
- *Have the outcomes of your consultation and engagement results identified potentially negative or positive impacts?*
- *Are some groups less satisfied than others with the activity as it currently stands?*
- *Is there a greater impact on one protected group, is this consistent with the aims of the activity?*
- *For organisational change / restructures analyse the outcomes of consultation with staff and trade unions and analyse the staff data provided by your change adviser*
- *Does the activity have the potential to advance equality and foster good relations?*
- *Could the activity deliver potential benefits for protected groups?*
- *If you have identified negative impacts include details of who these findings have been discussed with (e.g. Legal, HR, ESDG) and their views*
- *Could any part of the proposed activity [discriminate unlawfully](#)?*
- *Are there any further changes that could be made to deliver service improvements or make the activity more responsive?*

*Considering these questions will help you to identify the potential impact of your activity on protected groups.*

It is anticipated that the West End Project will result in traffic and public realm improvements in the Tottenham Court Road, Gower Street / Bloomsbury Street and New Oxford Street area which will have a **positive impact** on pedestrians, including wheelchair users and people who have pushchairs, as well as cyclists and the majority of bus users in the area.

This Equality Impact Assessment has identified that there will be a **positive impact**, particularly for older people, disabled people, and those with impaired mobility as a result of:

- Wider pavements on Tottenham Court Road allowing more space for powered wheelchairs and electric scooters
- Being able to arrive and leave from Tottenham Court Road by bus
- Shorter bus journey times and improved journey time reliability through the area
- Removal of street clutter providing more available pavement width and making it easier for people with visual impairments to navigate through the area
- Better pedestrian crossing facilities in terms of locations and pedestrian crossings all round junctions for most signalised junctions, with tactile and rotating cones throughout the area.
- Shorter crossing distances on most streets in the area with more straight across pedestrian crossings
- Increased time to cross at St Giles Circus and wider crossings at St Giles Circus, Princes Circus and on Gower Street by the University College London campus
- Increase in the number of Blue Badge disabled parking bays in the area, including in the

vicinity of the hospital.

- Less traffic in the area leading to better air quality
- Improved lighting reducing fear of crime
- Raised junctions throughout the area making it easier to cross for wheelchair users. Tactile paving would be provided to assist visually impaired people.
- New and improved public spaces
- All University College London Hospital sites would continue to be accessible at all times by taxis or other motor vehicles.

The proposals would also benefit younger people specifically in terms of:

- Reducing road danger
- Improving the environment for walking and cycling and therefore encouraging independent mobility
- Improving east-west walking routes to school in particular by making Tottenham Court Road and Gower Street easier to cross and therefore reducing pedestrian severance
- Providing more public space including a new park at Alfred Place in an area with a deficit of publicly accessible green space.

More seating would be provided which benefits people of all age groups and with mobility impairments, but particularly older and younger people.

The traffic access restriction would be daytime only so as to facilitate the night-time economy and safer travel at night, which would be positive for all groups but particularly women, older people, disabled people and the LGBT community. Improvements in bus services also help to improve personal security and perceived personal security by allowing people to leave an area more quickly and easily.

The shorter bus journey times and improved bus journey time reliability also provide benefits for women who tend to have more complex journey chains for reasons such as being more likely to be primary carers for children or older relatives, and working part time.

This Equality Impact Assessment recognises there may be some **negative impacts** for car users, taxi drivers and taxi users, as well as bus users on Gower Street, as removing buses from Gower Street reduces access in that location as a result of the West End project. However it is not anticipated that it will result in any unlawful discrimination on groups with protected characteristics.

The potentially **negative** impacts that have been identified include:

- Restrictions on taxi access to Tottenham Court Road to improve conditions for walking and cycling, improve air quality, reduce casualties and reduce congestion
- Potential increase in taxi fares paid due to restrictions on Tottenham Court Road
- Relocation of buses from Gower Street to Tottenham Court Road to allow people to arrive and leave on the same street
- Narrowing pavement on Gower Street due to the provision of a stepped track cycle lane
- Reducing the number of bus stops on Tottenham Court Road to improve bus flow through the area and help to reduce bus journey times and improve bus journey time reliability
- Reduction in the number of pay and display bays in the area as a whole, as surveys show these are underused

- Reduction in the number of green badge disabled parking bays in area, as surveys show these are underused
- Longest section of Tottenham Court Road that would be restricted is 120m, and so the longest distance from taxi pick-up or drop-off through use of side road access would be 60m.

This assessment recognises that residents living in or around the areas where the traffic and public realm improvements will be made may face some temporary noise and disruption during the implementation phase, and parking and transport pressures may be felt. However the impact is likely to affect residents' groups regardless of their protected characteristics and will not result in any unlawful discrimination.

### Summary

The West End Project has the potential to advance equality and foster good relations in the local community by:

- reducing traffic to improve air quality
- improving road safety for the most vulnerable road users; pedestrians and cyclists
- encouraging sustainable healthy travel
- developing high quality accessible public space (including a new green space) and accessible streets and
- supporting Camden's growth and regeneration, enhancing economic and community development.

The positive and negative impacts have been discussed with the Cabinet Member, Regeneration, Transport and Planning, the Director, Culture and Environment and the Assistant Director, Environment and Transport. The resulting measures to mitigate any negative impacts may include:

- more taxi ranks on side streets adjacent to Tottenham Court Road, and specifically on Grafton Way, close to the entrance to UCLH
- an increase in the number of pay and display parking bays in the vicinity of hospital
- provision of more seating

The views of the Cabinet Member and the senior officers were that the advantages of the proposals and significant investment in the area, together with the mitigation measures proposed and ongoing engagement with affected groups would address the issues raised.

The West End Project aims to balance the needs of all road users including protected groups, in line with the Council's Transport Strategy and road user hierarchy, which prioritise walking, cycling and public transport users. While the overall benefits delivered by the project are significant, it is inevitable in the sharing of the limited street space between uses that there will need to be compromises. If taxis were allowed to use the full length of Tottenham Court Road, this would have negative impacts for pedestrians, cyclists and bus users.

Following this assessment, we consider the correct balance is for the proposals to provide improvements where they would have the greatest benefit. This balance achieves a significant shift of space towards public realm, walking and cycling at a time of rising demand. It is considered that the proposals as amended represent the best balance that can be achieved to meet the various demands.



Equality impact summary

Please use this grid to summarise the impacts outlined above.

Protected group	Summarise any possible negative impacts that have been identified for each protected group and the impact of this for the development of the activity	Summarise any positive impacts or potential opportunities to advance equality or foster good relations for each protected group
Age	Taxi restriction on TCR, narrower pavements on Gower Street, loss of pay and display parking.	Less traffic and congestion, improved environment for walking and cycling, improved air quality, improved road safety, provision of more pay and display parking in the vicinity of the hospital, more seating, wider pavements on TCR, vehicle access to all hospital sites retained, better pedestrian crossing facilities, additional taxi ranks on side roads.
Disability	Taxi restriction on TCR, narrower pavements on Gower Street, loss of Green Badge disabled parking.	Less traffic and congestion, improved environment for walking and cycling, improved air quality, improved road safety, provision of more disabled parking, more seating, wider pavements on TCR, vehicle access to all hospital sites retained, better pedestrian crossing facilities, additional taxi ranks on side roads.
Gender reassignment	N/A	As above
Marriage and civil partnership	N/A	As above
Pregnancy and maternity	N/A	As above
Race	N/A	As above
Religion or belief	N/A	As above
Sex	N/A	As above
Sexual orientation	N/A	As above

### Stage four - planning for improvement

This section of the form should be completed when you are developing plans for the future delivery of the activity.

The actions identified below can also be included in your service plan to help mainstreaming and for performance management purposes. They should also be included in any decision making reports relating to the activity you are analysing. You may find it helpful to document the actions in an [action plan](#).

#### What actions have been identified:

- to mitigate against or minimise any negative impacts?
- to advance equality, and therefore improve the activity?

*Please consider and include:*

- *Plans already underway to address the impacts identified;*
- Provide additional seating where taxis would not be able to access sections of Tottenham Court Road of over 100m, in line with Guidelines for Inclusive Mobility (<https://www.gov.uk/government/publications/inclusive-mobility>) which recommends that people with mobility impairments should be able to rest at intervals of 50m. Provision of additional disabled bays in the area, including in the vicinity of the hospital.
- Provision of additional pay and display bays in the area, including in the vicinity of the hospital.
- *Changes planned to address the impact identified;*

The changes listed above will be recommended as part of the report to the Council's Cabinet and would be implemented, if the proposals were to go ahead.

- *Any planned, additional or on-going consultation or research;*

Review under ULEZ.

- *Plans to adapt the activity to ensure it provides opportunities to advance equality of opportunity;*

The proposals already involve making the streetscape fully accessible in terms of providing dropped kerbs, tactile paving, reducing street clutter, providing more seating and better pedestrian crossing facilities.

- *Plans to foster good relations;*

Officers would continue to work with local residents, businesses and hospitals in the area to ensure that their own, customers' and patients' needs are catered for, where possible, within the agreed objectives and scope of the scheme.

Officers would return to the Council's Mobility Forum, if the proposals were to be taken forward, to explain the changes that had been made in response to their comments.

- *How the proposed activity will be developed and communicated to stakeholders.*

The consultation report containing the amendments to the proposals will be presented to the Council's Cabinet on 21 January 2015 and the report will be made public on 13 January 2015.

Officers would return to the Council's Mobility Forum, if the proposals were to be taken forward, to explain the changes that had been made in response to their comments.

The effects of the West End Project will continue to be assessed during their implementation in order to identify, mitigate and minimise any negative impacts. This Equality Impact Assessment will be reviewed and further assessments will be carried out to ensure that there is no unlawful discrimination on groups with protected characteristics.

- *If potential **unlawful discrimination** was identified during the equality analysis the activity should not be continued and alternatives must be considered.*

## Stage five - outcome of the EIA

Use this stage to record the outcome of the EIA. An EIA has four possible outcomes.

Outcome of analysis	Description	Select as applicable
Continue the activity	The EIA shows no potential for discrimination and all appropriate opportunities to advance equality and foster good relations have been taken	
Change the activity	The EIA identified the need to make changes to the activity to ensure it does not discriminate and/ or that all appropriate opportunities to advance equality and /or foster good relations have been taken. These changes are included in the planning for improvement section of this form.	X
Justify and continue the activity without changes	The EIA has identified discrimination and / or missed opportunities to advance equality and / or foster good relations but it is still reasonable to continue the activity. Outline the reasons for this and the information used to reach this decision in the box below.	
Stop the activity	The EIA shows unlawful discrimination.	
<p>Reasons for continuing with an activity when negative impacts or missed opportunities to advance equality have been identified.</p> <p>The project makes significant gains, including for protected groups, such as reducing exposure to poor air quality, providing a safer and more attractive street environment, providing new public spaces including a new green space in an area with a green space deficit. The project favours the majority who do not have access to cars, and who are reliant upon walking, cycling and access to public transport. In these ways the project will assist in addressing some of the health and access inequalities in the borough. The project is designed to minimise some of the potential impacts, for example in maintaining full accessibility to UCLH by all modes, and by allowing full taxi access in the evening and at night. Mitigations are planned to address negative impacts, for example with more seating to assist in the journey from permitted taxi access to addresses on TCR. Overall the project is therefore considered to have a positive impact, with efforts made to avoid or mitigate any negative impacts.</p>		

### Stage six - review, sign off and publication

#### Review

Your EIA will have helped you to anticipate and address the activity's likely effect on different protected groups. However the actual effect will only be known once it is introduced. You may find you need to revise the activity if negative effects do occur. Equality analysis is an ongoing process that does not end once an activity has been agreed or implemented.

Please state here when the activity will be reviewed, and how this will be done, for example through the service planning process, when the service is next procured etc. This will help you to determine whether or not it is having its intended effects. You do not necessarily need to repeat the equality analysis, but you should review the findings of the EIA, consider the mitigating steps and identify additional actions if necessary.

For restructures or organisational change a review should take place once the restructure has been completed. In addition to the areas identified above your review should include an evaluation of how the staff profile after the organisational change compares to Camden's profile, the division profile and the staff profile prior to the change. Your HR change adviser will provide you with the necessary data.

Date when EIA will be reviewed: July 2015 \_\_\_\_\_

#### Sign off

The EIA must be quality assured within the directorate before sign-off by the service head /AD.

Quality assured by:	Suzanne Griffiths, Strategy & Improvement Manager
Quality assured by OD for organisational change / restructures:	
Signed off by:	Sam Monck, Assistant Director, Environment & Transport
Date:	07/01/2015
Comments (If any)	

#### Publication

If the activity will be subject to a Cabinet decision, the EIA must be submitted to committee services along with the relevant Cabinet report. Your EIA should also be published on Camden Data. All EIAs should now be uploaded to the [SharePoint site](#).