

# Traffic Management Advisory Committee Supplementary Agenda



**5. Crystal Palace and South Norwood Low Traffic  
Neighbourhood Addendum Report (Pages 3 - 60)**

This report comprises the addendum to the January 2021 Report requested by the Cabinet Member.

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# Agenda Item 5

<b>REPORT TO:</b>	<b>TRAFFIC MANAGEMENT ADVISORY COMMITTEE</b> <b>15 February 2021</b>
<b>SUBJECT:</b>	<b>The Crystal Palace and South Norwood Low Traffic Neighbourhood: Addendum Report</b>
<b>LEAD OFFICER:</b>	<b>Shifa Mustafa, Executive Director, Place Steve Iles, Director, Public Realm</b>
<b>CABINET MEMBER:</b>	Councillor Muhammad Ali, Cabinet Member for Sustainable Croydon
<b>WARDS:</b>	South Norwood, Crystal Palace and Upper Norwood

## **SUMMARY OF REPORT:**

On 27th January 2021, the Cabinet Member for Sustainable Croydon took the following decision (as summarised):

*In relation to the existing Crystal Palace and South Norwood Temporary Low Traffic Neighbourhood, to remove the measures implementing the existing Temporary Low Traffic Neighbourhood as soon as practicable;*

*In relation to the proposed Crystal Palace and South Norwood Experimental Low Traffic Neighbourhood:*

- *In relation to the report to the Traffic Management Advisory Committee held on 12 January 2021 (“the January 2021 Report”) – To request officers to prepare an addendum to the January 2021 Report addressing the judgment of Mrs Justice Lang in the case of (R (UTAG & LTDA) v Mayor of London and TfL [2021] EWHC 72 and the impact, if any, on the recommendations in respect of the proposed experimental order which were made to the Traffic Management Advisory Committee in the January 2021 Report; and*

*Refer the addendum back to the Traffic Management Advisory Committee for consideration, with a decision to be taken by the Cabinet Member thereafter.*

This report comprises the addendum to the January 2021 Report requested by the Cabinet Member. It advises on the continuing soundness of the recommendations made to TMAC in the January 2021 Report in the light of the judgment in *R (UTAG & LTDA) v Mayor of London and TfL [2021]*.

It includes the question asked of TMAC by the Cabinet Member when taking the decision:

***Following the preparation of the addendum to the January 2021 report, does the Traffic Management Advisory Committee endorse the recommendations 1.1 and 1.3 – 1.7 of the January 2021 report, or such other recommendation in the addendum, in respect of the proposed experimental order?***

In particular, this addendum considers:

- The Equality Analysis produced in the January 2021 Report and the subsequent revision to it, bearing in mind the judgment and the publication of the ‘Pave the Way’

report by Transport for All into the experiences of disabled people arising from LTNs recently implemented in London.

- The access of taxis and buses to the South Norwood and Crystal Palace LTN, bearing in mind the importance of such public transport for people with disability and schools within the area.

This Addendum recommends increasing the categories of vehicle to which Automatic Number Plate Recognition (ANPR) camera technology (Recommendation 1.3.1 in the January 2021 Report), shall not apply, to include, taxis and buses, including Dial-a-Ride vehicles. It also states that the eligibility for permits providing exemption to the recommended Experimental LTN restrictions in the January 2021 Report, should be extended from vehicles belonging to residents within the area of the LTN to:

- Vehicles of staff employed at Cypress School and Harris Academy Crystal Palace;
- Vehicles used by care givers of sick and/or disabled residents within the area of the LTN;
- Vehicles registered by Blue Badge holders;

In addition, the opportunity has been taken to consider a GLA and TfL commissioned study into the air quality improvement effects of implementing the Mayor's air quality related policies, published on 22 January 2021.

**POLICY CONTEXT:**

See the January 2021 Report.

**FINANCIAL IMPACT:**

A revision of the Equality Analysis has resulted in an addition to the scope of the proposed Experimental LTN, estimated to result in a project cost increase of £25,000. Meeting this additional cost is to be included within the Council's ask to Transport for London, when seeking release of LIP Funding for 2021/22.

**KEY DECISION REFERENCE NO.: 6520SC**

**RECOMMENDATIONS:**

The recommendations made to the Traffic Management Advisory Committee in the January 2021 Report are maintained subject to the following changes:

1. Having considered the revised Equality Analysis, the Traffic Management Advisory Committee recommend to the Cabinet Member for Sustainable Croydon that:
  - 1.1 The categories of vehicle to which Automatic Number Plate Recognition (ANPR) camera technology (Recommendation 1.3.1 in the January 2021 Report), shall not apply is extended to include:
    - (a) a vehicle being used for fire brigade, ambulance or police purposes;
    - (b) anything done with the permission of a police constable in uniform or a civil enforcement officer;
    - (c) a vehicle being used for the purposes of a statutory undertaker in an emergency, such as the loss of supplies of gas, electricity or

water to premises in the area, which necessitates the bringing of vehicles into a section of road to which the order applies;

- (d) buses;
- (e) licensed taxis
- (f) Dial-a-Ride vehicles;
- (g) vehicles to which a valid exemption permit has been provided.

for the reasons set out in this report and summarised at paragraph 3.12 and 15.3 of the January 2021 Report.

1.2 The Cabinet Member consider the revised Equality Analysis when making their decision in relation to recommendations 1.1 and 1.3 -1.7 in the January 2021 Report.

## 1. INFORMATION WITHIN AND EFFECT OF THE ADDENDUM REPORT

### Reasons for the Addendum

1.1 At its meeting of 12<sup>th</sup> January 2021, the Traffic Management Advisory Committee (TMAC) considered the report 'The Crystal Palace and South Norwood Low Traffic Neighbourhood' ('the January 2021 Report'<sup>1</sup>) and the recommendations within it. Between the meeting of TMAC and the Cabinet Member for Sustainable Croydon taking the Key Decision, a High Court Judgement was issued in respect of:

- Transport for London's and the Mayor of London's 'Streetspace Plan for London';
- the associated 'Interim Guidance to Boroughs'; and
- the 'A10 GLA Roads (Norton Folgate, Bishopsgate and Gracechurch Street, City of London (Temporary Banned Turns and Prohibition of Traffic and Stopping) Order 2020' made by Transport for London (TfL).

In relation to the recommendations in the Report, and following the High Court Judgement, the Cabinet Member took the decision<sup>2</sup>:

*'Having carefully read and considered the Part A report, in the signed decision notice attached and the requirements of the Council's public sector equality duty in relation to the issues detailed in the body of the reports, the Cabinet Member for Sustainable Croydon*

<sup>1</sup> <https://democracy.croydon.gov.uk/mgAi.aspx?ID=10368#mgDocuments>

<sup>2</sup> <https://democracy.croydon.gov.uk/ieDecisionDetails.aspx?ID=598>

**Resolved:**

1.1 To consider:

- a) *the responses received to the informal consultation on the options for the future of the Crystal Place and South Norwood Temporary Low Traffic Neighbourhood and other feedback.*
- b) *the Mayor of London's Transport Strategy and the Council's plan to implement it within the Borough (the Croydon Local Implementation Plan).*
- c) *the Council's statutory duties, including its duties under the Road Traffic Regulation Act 1984, in particular its duties under s.9, s.121B and s.122, its duties under the Traffic Management Act 2004, in particular its duty under s.16, its duties under the Equality Act 2010, in particular under s.1 and s.149 (the public sector equality duty).*
- d) *the statutory guidance 'Traffic Management Act 2004: network management in response to COVID-19' as updated on 13 November 2020.*
- e) *the other matters within and referred to within this report.*

1.2 To agree to the removal of the measures implementing the Temporary Low Traffic Neighbourhood as soon as practicable and in any event prior to the implementation of the recommended Experimental TRO.

1.3 To request the following additional information to enable consideration of the recommendations 1.1 and 1.3 – 1.7 of the January 2021 report

- a) *An addendum to the January 2021 report addressing the judgement of Mrs Justice Lang in the case of (R (UTAG & LTDA) v Mayor of London and TfL [2021] and the impact, if any, on the recommendations in respect of the proposed experimental order which were made to the Traffic Management Advisory Committee in the January 2021 report.*

1.4 To request the following question be put to the Traffic Management Advisory Committee/officers/persons who made representations to the Committee/in response to the consultation to facilitate further consideration of the recommendations in paragraph 1.1 and 1.3 – 1.7 of the January 2021 report

- a) *Following the preparation of the addendum to the January 2021 report, does the Traffic Management Advisory Committee endorse the recommendations 1.1 and 1.3 – 1.7 of the January 2021 report, or such other recommendation in the addendum, in respect of the proposed experimental order.*

1.5 To request the additional information and questions be put to the Traffic Management Advisory Committee/officers/persons who made representations to the Committee/in response to the consultation to enable further consideration of the recommendations at 1.1 and 1.3 – 1.7 of the January 2021 report.

**a) Response from local school and how we will work with them to resolve their concerns**

The two local schools have both expressed concern with regards access to their establishments by teachers and other staff. The team are to investigate how these concerns can be addressed to best effect for all concerned

**b) Access for care workers**

The needs of our residents who require home care, be that via professionals or family members, must be considered so that they and their care givers are not disadvantaged by this scheme. Clarity needs to be given as to how the Council will deal with the essential needs of those affected.

**c) Access for car clubs**

Car clubs do mean that there are less cars on our roads at any one time as households can rely on the use of such clubs almost entirely. Residents living within the zone that do not have access to their own car or rely from time to time on the use of car club alternatives should not be penalised for trying to reduce their reliance upon the ownership of a car or similar. The team is to investigate how car clubs can be incorporated into the operation of the zone in a similar way to Care Givers.

**d) Period of experimental order**

It is acknowledged that the Committee did not want the Experimental TRO to last beyond 12 months, with a review at that stage.

**e) Engagement with the London Borough of Bromley**

Officers to report to TMAC on a regular basis to allow for the updating of the committee as we work together with Bromley to progress the scheme.

Notwithstanding the above, since the meeting of TMAC I have been made aware of the judgment of Mrs Justice Lang in the case of (R (UTAG & LTDA) v Mayor of London and TfL [2021] EWHC 72 which has quashed the London Streetspace Plan and Transport for London's "Interim Guidance to Boroughs". Whilst I understand that the quashing order is stayed pending appeal by TfL, I consider it necessary to fully understand the impact of the judgment, if any, on the recommendations to the Traffic Management Advisory

*Committee, to take a decision in relation to the proposed Experimental Orders which will comprise the Low Traffic Neighbourhood.'*

as detailed in the Public Notice of Key Decision No: 6520SC, 27<sup>th</sup> January 2021 taken by the Cabinet Member for Sustainable Croydon and published by the Council Solicitor and Monitoring Officer on 27<sup>th</sup> January 2021.

- 1.2 This addendum report addresses the judgment of Mrs Justice Lang, and matters raised at the TMAC meeting on 12<sup>th</sup> January 2021, namely:
- Responses from local schools and how we will work with them to resolve their concerns
  - Access for care workers
  - Access for car clubs
  - Length of the experiment period before review
  - Working with Bromley Council
- 1.3 Since the meeting of TMAC on 12<sup>th</sup> January, Transport for All published its report 'Pave the Way' on LTNs (implemented in London following the start of the Covid19 Pandemic) reporting the experience and views of 84 people with disabilities recruited into the study. The publication of 'Pave the Way' has informed further development of the Equality Analysis relating to the proposed Experimental LTN, which in turn has informed amended recommendations.

#### The High Court Judgement

- 1.4 On 20 January 2021 the High Court handed down judgment in R (UTAG & LTDA) v Transport for London & Mayor of London [2021] EWHC 72(Admin)<sup>3</sup>, which involved the consideration of two consolidated claims for judicial review ("the Judgment"). The claims for Judicial Review were brought by representatives of the 'Black Cab' industry to challenge:
- 1) The Mayor of London's Streetspace Plan;
  - 2) The Streetspace Interim Guidance produced for London Boroughs; and
  - 3) A Traffic Management Order made under Section 14 RTRA 1984 restricting the use of the A10 at Bishopsgate to Buses and cycles only ("the A10 Order") against TfL was brought by the United Trade Action Group Limited and the Licensed Taxi Drivers Association Limited representing taxis/black cab drivers. There were five grounds for judicial review, four of which were upheld, the Judge ruling:
- 1.5 The Judge considered five grounds of challenge, of which the following succeeded:
- Ground 1:** in making the Streetspace Plan and Interim Guidance, the Mayor and TfL failed to distinguish taxis from "general traffic" failing to have regard to relevant material considerations, namely:

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<sup>3</sup> <https://www.bailii.org/ew/cases/EWHC/Admin/2021/72.html>



- the distinct status of taxis as a form of public transport, reflected both in law and policy;
- the role played by taxis in facilitating accessible public transport for those with mobility impairments.

This ground succeeded in relation to the Streetspace Plan and Interim Guidance, and the judge made particular note that (a) taxis were not mentioned in either the Streetspace Plan or Interim Guidance; (b) the importance of taxis for the purposes of access for people with disability and (c) that the Streetspace Plan and Interim Guidance were made without regard to the Bus Lane Policy and Policy Guidance. It is noted however, Ground 1 did not succeed in respect of the A10 Temporary Order.

**Ground 2:** In making the Streetspace Plan and Interim Guidance and the A10 Order, TfL and the Mayor failed to have proper regard to the public sector equality duty, pursuant to section 149 of the Equalities Act 2010.

This Ground also succeeded. For the purposes of the Streetspace Plan and the Interim Guidance, the judge considered that the Duty applied and that there was no evidence that the Defendant did in fact comply, having not undertaken an Equality Impact Assessment. In relation to the A10 Order, it was considered that the Equality Impact Assessment that was undertaken “did not meet the required standard of a “rigorous” and “conscientious” assessment, conducted with an open mind”.

**Ground 4:** The Streetspace Plan and Guidance and the A10 Temporary Order breached the Claimants’ legitimate expectation to pass and repass on London’s roads, and to use lanes reserved for buses. The Claimant succeeded in asserting that taxis have a legitimate expectation to use bus lanes.

**Ground 5:** The treatment of taxis in the Streetspace Plan and Interim Guidance and the A10 Order was irrational.

The judge considered that the flaws in decision making were sufficient to deem the Streetspace Plan, Interim Guidance and A10 Order as irrational. Issues were pointed out in respect of a lack of consultation, lack of evidence base and failure to consider alternative options.

As a result, the Judge quashed the Streetspace Plan, the Interim Guidance and the A10 Order however the quashing order was stayed pending appeal by TfL. Should the appeal be unsuccessful, TfL may apply for further time (if required) to finalise a revised Streetspace Plan, Interim Guidance and Temporary Order before the quashing orders take effect. As such the Streetspace Plan for London and the Interim Guidance to Boroughs still stand pending the outcome of the appeal process. It is understood from TfL that they intend to lodge an appeal, and have until 10<sup>th</sup> February to do so. A verbal update will be provided to TMAC on 15<sup>th</sup> February.

The recommendations in the January 2021 Report included an exemption to the Auckland Road bus gate restrictions for licensed taxis, recognising the status of taxis as a form of public transport.

1.6 Recommendation 1.1 in the January 2021 Report was to consider a number of specific matters. The Streetspace Plan and Interim Guidance were not amongst the matters specified. However, the final part of recommendation 1.1 was to consider the other matters within and referred to within the Report. Section 3 of the Report set out the background to the recommended Experimental LTN:

- beginning with the Local Implementation Plan (LIP) proposal to pursue a Healthy Schools Neighbourhood at Upper Norwood and the early work initiated just prior to the Covid19 Pandemic
- reporting the Secretary of State for Transport's call to local authorities in May to take swift action to create space for social distancing, walking and cycling
- reporting TfL's announcement that there would be no funding (at least for the first half of 2020/21) to support delivery of LIPs, instead this was being replaced by funding to deliver the Streetspace Plan for London
- explaining that in order to produce a more strategic response to the Streetspace Plan for London within Croydon, officers had employed research including TfL's 'Temporary Strategic Cycling Analysis' and 'Strategic Neighbourhood Analysis' (both of which are appendices to the Interim Guidance).

1.7. Para 3.15 of the report summarises the reasons for the recommendation:

- beginning with the continuing Covid19 Pandemic and the Secretary of State reiterating his call to local authorities to take action; and
- explaining that LTNs are a key means of implementing the Mayor of London's Streetspace Plan and his Transport Strategy, (in particular the Healthy Streets approach and objective within the Strategy), before outlining the further reasons for the recommendation.

1.8 The reasons for the recommendations / proposed decision are set out at Section 15 of the January 2021 Report. Again these include:

- the continuing Covid19 Pandemic (and the Secretary of State's call to local authorities to take action); and
- the recommended LTN being (when combined with others) a major means of delivering objectives in the Mayor of London's Transport Strategy including the Healthy Streets objective and the 'Top Priority' cycle corridor identified by TfL from Crystal Palace to the Town Centre. Whilst the priority cycle corridors were identified in TfL's 'Analysis for Temporary Strategic Cycle Network', which is an appendix to the Interim Guidance, TfL's methodology and conclusions are considered sound, reflecting findings in TfL's 2017 'Strategic Cycling Analysis: Identifying future cycling demand in London'.

1.9 As stated in 1.1 above, the quashing of the Streetspace Plan and Interim Guidance was stayed by the Judge. Consequently (for the time being) the Streetspace Plan and Interim Guidance remain important matters when considering the recommendations within the January 2021 Report. That said,

were there hypothetically to be no Streetspace Plan for London, the remaining matters of importance set out in the January 2021 Report, are so wide and strong that it is considered that the recommendations in the Report would still stand and are justified.

#### Transport for All's 'Pave the Way' Report

- 1.10 As suggested by the terms 'Experimental LTN' and 'Experimental Traffic Order', the intention was that this be an experiment that could be trialled, refined and adjusted. The recommendations in the January 2021 Report include the ability to vary the provisions of the Experimental Traffic Order including the exemptions to the restrictions. The intention was to look to lessen the restrictions / widen the exemptions prior to the start of the experiment and /or as part of the experiment, whilst being compatible with the objectives of the Experimental LTN. The Equality Analysis included the recommendation (referenced at para 6.9 of the January 2021 Report) that there should be a dialogue with Dial-A-Ride, Community Transport and SEN Transport operators and users, to help refine the operation of the trial scheme.
- 1.11 Since the 12<sup>th</sup> of January, Transport for All published a report 'Pave the Way' into the experiences of disabled people arising from LTNs recently implemented in London. The opportunity has been taken to revise the Equality Analysis relating to the recommended Experimental LTN. This has resulted in a slight amendment of the recommendations, namely to exempt buses and taxis from the camera enforced 'No Motor Vehicle' restrictions and signs from the outset of the Experimental LTN. This to provide for free movement of Dial-A-Ride vehicles, taxis, buses used by the SEN Transport Service and Community Transport Minibuses.

#### Response from Local School and How We Will Work With Them to Resolve Their Concerns

- 1.12 A response was received from the joint Executive Headteacher Pegasus Academy Trust (Trust includes Cypress School) via the online residents' survey questionnaire regarding the future for the Temporary LTN. The comment boxes summarised concerns (later expressed in a witness statement<sup>4</sup> and an email following TMAC). The address given was a residential address, and the significance of the questionnaire entry /comments was not fully picked up (and separately addressed) from amongst the 5,293 entries received, and 4,315 responses analysed. Six further questionnaire responses mentioned either 'Pegasus' or 'Cypress'. These gave personal experiences and views, again giving residential addresses. Following the meeting of TMAC the Joint Executive Head Teacher emailed TMAC members and others, setting out her concerns including:
- There are a number of schools within the trust (Cypress Primary School, Whitehorse Manor Infant School, Whitehorse Manor Junior School, Ecclesbourne Primary School and Beulah Infant School) and The personal and professional lives of a significant number of staff working

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<sup>4</sup> Statement dated 9/1/20 but presumed to be 09/01/2021 (as it references an event on 08/12/2020) emailed to officers, the Leader of the Council and the Cabinet Member for Sustainable Croydon by 'Open our Roads' following the meeting of TMAC on 12<sup>th</sup> January (see Background Documents).

within The Pegasus Academy Trust have been greatly impacted by the closure of roads which are crucial for our work with over 2000 pupils in South Norwood and Thornton Heath.

- Some staff are now seeking work elsewhere as they cannot manage the extended journey to and from work and when needing to travel between schools which they often need to do.
- The impact on staff wellbeing is enormous. The added journey times as well as the difficulties faced travelling between schools is causing stress and impacting on the quality of education
- ANPR will not improve the situation, the main problem is inaccessibility to roads and large queues of stationary traffic.

The council's Head of Transport spoke with the Joint Executive Headteacher as this report was being finalised. The Joint Executive Headteacher has provided wording at appendix 1, which represents her personal views and those of the staff affected.

1.13 Officers are not aware of correspondence from the Harris City Academy Crystal Palace being received directly. An email was sent by Ms Eliska Finlay on the 14<sup>th</sup> of January to TMAC members and others, attaching a screenshot of messaging with/from the Head of the Academy on the 14<sup>th</sup> (appendix 2). The points made by the Head include:

- Increased travel time due to the LTN restrictions and the bottleneck it has caused at Crystal Palace
- ANPR with exemption/access for staff would lessen concerns and stress but many would not want to apply for a pass to work to educate the nation's next generation.

1.14 Following the meeting of TMAC, an official complaint was received from a person with connections to a number of schools (none directly within the area of the Temporary LTN) expressing concerns including:

- Process, both in terms of management of the consultation and at the meeting of TMAC re' failure to engage with schools effectively and report the views of schools
- Harris South Norwood and All Saints Primary Schools are located on the boundary roads of the LTN with both schools' playgrounds located on distributor roads receiving displaced traffic from the LTN.
- Schools have a duty to provide school meals, required to include fresh food. Catering services need regular and timely deliveries of fresh produce. What steps have council officers taken to ensure that these essential food deliveries are not adversely affected by the road closures?

1.15 Prior to the start of the recommended Experimental LTN, the list of vehicles (provided by Cypress School) to have exemption from the Cypress Road School Pedestrian Zone restrictions, will be used to provide a wider exemption from the Crystal Palace and South Norwood Experimental LTN restrictions, for vehicles used by staff to access Cypress School. A request will be made to Harris Academy Crystal Palace for a list of staff vehicles to have exemption from the Experimental LTN restrictions.

- 1.16 The communications and engagement plan for the period prior to the operation of the Experimental LTN and during it, has yet to be finalised. Schools will be an important element within that plan. It is hoped that a positive relationship can be re-established with Cypress School and established with Harris Academy Crystal Palace. The hope is to draw in, consider and respond to the views of school staff, and children and young people attending the schools.
- 1.17 Having considered the views regarding schools, it is not considered necessary to further amend the recommendations. However, it is important that officers engage with schools in the area of the recommended Experimental LTN, and where proposing or reviewing other LTNs. This with a view to ensuring, as far as possible (whilst still achieving the Healthy Streets and Low Traffic Neighbourhood objectives) ease of access for school staff to schools, and operational access between schools.

#### Access for Care Workers

- 1.18 The needs of residents who require home care, given by professionals or family members, have to be considered so that they and their care givers are not disadvantaged by the recommended Experimental LTN scheme. Residents within the area of the LTN will be able nominate carers' vehicles to be provided with an exemption permit relating to the experimental LTN restrictions.

#### Access for Car Clubs

- 1.19 Under the historic model of car club operation (whereby car club vehicles are driven from, and returned to, designated parking bays) providing exemption permits for car club vehicles 'based' within an LTN, would hopefully be straightforward. However, car clubs have moved to a model of 'floating' vehicles. Car club vehicles can be left wherever they can be legally parked, and car club users locate the parked vehicles using mobile apps. Officers will work with car club operators to devise a solution. Ideally, this will be a London-wide solution as the issue will be common to LTNs across the Capital.

#### Period of Experiment

- 1.20 An Experimental Traffic Order can last for up to 18 months. However, if implemented, the Experimental LTN will be reviewed after 12 months and recommendation as to its future brought to TMAC. It is also intended to incorporate any adjustments to the Experimental LTN, (arising as a consequence of issues identified by the public and reported, or via professional assessment) within the first six months of operation. If any adjustment is deemed essential beyond that time, then the adjustment is to be discussed at TMAC.

#### Engagement with the London Borough of Bromley

- 1.21 Officers will report to TMAC on a regular basis, updating the Committee on the work with Bromley and other neighbouring Highway and Traffic Authorities (including TfL) to progress the Experimental LTN.

### Blue Badge Parking Permit Holders

- 1.22 Following the revision of the Equality Analysis, it is proposed to widen the exemption eligibility to holders of Blue Badge parking permits, enabling holders to register up to two vehicles (akin to the Congestion Charge scheme). This is to provide ready and direct vehicle access to premises within the Experimental LTN, including the Auckland Surgery, for blue Badge holders living beyond the LTN.

## **2. CONSULTATION**

- 2.1 See the January 2021 Report.
- 2.2 Letters were received from Steve Reed MP, Ellie Reeves MP and Bromley Council just prior to the 12<sup>th</sup> January meeting of TMAC. Verbal outline summaries were given to TMAC by the Head of Transport at the end of his introduction presentation to the meeting. Having considered the letters prior to the meeting, and balancing the content with the matters within the Report, the recommendation to implement an Experimental LTN was left unchanged. The letters were passed to the Cabinet Member for Sustainable Croydon for his consideration. Officers are considering the suggestion of a 'citizen's assembly' perhaps using the 'infrastructure' of the Croydon Climate Crisis Commission.

## **3. REASONS FOR RECOMMENDATIONS / PROPOSED DECISION**

- 3.1 The recommendation to increase the categories of vehicle to which Automatic Number Plate Recognition (ANPR) camera technology, shall not apply, to include, taxis and buses, including Dial-a-Ride vehicles, flows from the revision to the Equality Analysis.

## **4. OPTIONS CONSIDERED AND REJECTED**

- 4.1 Not reporting to TMAC on the implications (if any) of the High Court Judgement issued in respect of: TfL's and the Mayor of London's Streetspace Plan, Interim Guidance and TfL's A10 Order, was considered and rejected.

## 5. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

### 5.1 Revenue and Capital consequences of report recommendations

	Current Year	Medium Term Financial Strategy – 3 year forecast		
	2020/21 £'000	2021/22 £'000	2022/23 £'000	2023/24 £'000
<b>Revenue Budget Available</b>				
Expenditure Income				
<b>Effect of decision from report*</b>	n/a	n/a	n/a	n/a
Expenditure Income				
<b>Remaining Budget</b>				
<b>Capital Budget available</b>		25 Additional (to be part of the 21/22 LIP request to TfL)		
Expenditure Income		25 Additional Expenditure		
<b>Effect of decision from report</b>		25 Additional Expenditure		
Expenditure Income				
<b>Remaining Budget</b>				

\*There are no revenue implications apart from that stated in the Report to TMAC 12/1/21

## **5.2 The effect of the decision**

See the Report to TMAC 12<sup>th</sup> January 2021

The Report to TMAC on 12<sup>th</sup> January confirmed that the effect of agreeing and implementing the recommendation would be to incur a cost of £157,000, all of which would be met from ring-fenced grant funding. The revision of the Equality Analysis (see section 8 of this addendum report) has resulted in a slight change to the proposed Experimental LTN, namely installing temporary 'parklets' in Auckland Road incorporating seating, and monitoring their use. This is predicted to increase the project cost by approximately £25,000. Meeting this additional cost is to be included within the Council's ask to TfL when seeking release of LIP Funding for 2021/22. This additional cost (and only this additional cost) is shown in the table at 5.5 above. For full understanding of the revenue and capital consequences of the recommendations, please see the Report to TMAC 12<sup>th</sup> January.

## **5.3 Risks**

See the January 2021 Report.

## **5.4 Options**

See the January 2021 Report.

## **5.5 Future savings/efficiencies**

See the January 2021 Report.

*(Approved by: Geetha Blood, Interim Head of Finance, Place and Resources)*

## **6. LEGAL CONSIDERATIONS**

- 6.1 Subject to compliance with statutory processes and broader public law principles, Croydon Council is able to make an Experimental Traffic Regulation Order ('TRO') under Section 9 of the Road Traffic Regulation Act 1984 ('1984 Act'), by virtue of the Experimental Order being for the purpose of 'prescribing streets which are not to be used for traffic by vehicles, or by vehicles of any specified class or classes, either generally or at specified times' under Paragraph 2 of Schedule 1 and Section 6 of the 1984 Act. The Experimental TRO must extend for no longer than 18 months.
  
- 6.2 The Order may be made subject to compliance with the procedure set out in the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 ('1996 Regulations'). Whilst statutory consultees are listed at Regulation 6 of the 1996 Regulations, there is no statutory requirement for public consultation. For the purposes of an experimental order, the Council is



not required to publish a notice of intention or consider objections prior to making the TRO. Croydon Council will be obliged to consider any such objections at the point of a determination as to whether the Experimental LTN becomes permanent.

6.3 Croydon Council must publish a notice on making in relation to the Experimental TRO not less than seven days prior to it coming into force. The notice must include the following statements at Schedule 5 of the 1996 Regulations:

- that Croydon Council will be considering in due course whether the provisions of the experimental order should be continued in force indefinitely
- that within a period of six months –
  - beginning with the day on which the experimental order came into force
  - if that order is varied by another order or modified pursuant to section 10(2) of the 1984 Act, beginning with the day on which the variation or modification or the latest variation or modification came into force,
  - any person may object to the making of an order for the purpose of such indefinite continuation
- that any objection must-
  - be in writing
  - state the grounds on which it is made; and
  - be sent to an address specified for the purpose in the notice making.

6.4 In addition to the statutory requirements, broader administrative law and duties ought to be considered, including the impact of case law on decision making. These have been substantively addressed within the January 2021 Report and this Addendum.

6.5 Under S121B of the 1984 Act, Croydon Council may not implement a TRO if it will, or is likely to affect a GLA Road, Strategic Road or a road in another borough unless it has notified TfL and the London Borough (as relevant) and the proposal has either (a) been approved; (b) received no objection within one month; (c) any objection has been withdrawn; or (d) GLA has given its consent after consideration of the objection.

*Approved by Sandra Herbert, Head of Corporate Law and Litigation on behalf of the Director of Law and Governance & Deputy Monitoring Officer.*

## **7. HUMAN RESOURCES IMPACT**

7.1 See the January 2021 Report.

## **8. EQUALITIES IMPACT**

8.1 The recommendations for an Experimental Traffic Order have been the subject of a detailed equality analysis. This analysis will continue to be updated and developed as new information emerges including from the monitoring of the recommended Experimental LTN (if implemented). In January, Transport for All published the report 'Pave the Way'. This reports the results of a study into the experiences of people with disabilities relating to Low Traffic Neighbourhoods implemented in London following the start of the Covid19 Pandemic. The opportunity has been taken, following publication of 'Pave the Way', to further develop the Equality Analysis which now incorporates recommendations to:

- undertake a street access audit to identify potential improvements such as footway repairs, installing dropped kerbs and reducing street clutter. The audit should be undertaken with members of the Mobility Forum when/as the lessening of the Pandemic allows.
- provide resting spaces by placing temporary 'Parklets' incorporating seating at locations in Auckland Road, and their use monitored.
- Develop the engagement strategy and monitoring strategy for the Experimental LTN with the involvement of Transport for All and members of the Croydon Mobility Forum.
- Allow taxis and buses to pass through the proposed camera enforced 'No Motor Vehicle' restrictions to facilitate access by Dial-a-Ride, taxis, SEN Transport buses and Community Transport minibuses.
- Widen exemption eligibility to holders of Blue Badge permits, enabling them to register up to two vehicles akin to the Congestion Charge scheme.

8.2 No ready solution has been identified to provide ease of access for disabled people using minicabs/private hire vehicles rather than taxis. Transport for All proposes a scheme that would grant dispensation for disabled people requiring access to their home, by any vehicle they choose. However, such a scheme is probably best developed across London with TfL, possibly facilitated by London Council's.

8.3 This Equalities Impact section should be read in conjunction with that in the January 2021 Report, when considering the recommendations.

*Approved by: Yvonne Okiyo Equalities Manager*

## **9. ENVIRONMENTAL IMPACT**

9.1 Concerns about the potential effect of the Temporary LTN on air quality have been expressed by a number of people. When comments received in response to the online residents' consultation survey on the future for the Temporary LTN were categorised and collated, around 13% responding and leaving comments expressed concern about potentially increasing traffic related air pollution.

9.2 Since the meeting of TMAC on the 12<sup>th</sup> January, a report<sup>5</sup> commissioned by the GLA and TfL into the air quality effects of implementing Mayoral policies, has been published. The Mayoral air quality policies considered in the study included the:

- imminent tightening of emissions standards for heavier vehicles in the London wide Low Emission Zone
- Ultra Low Emission Zones (brought forward in central London in 2019 and expansion to the inner area within the north and south circular roads in 2021); and
- London Environmental Strategy.

9.3 Chapter 3 ('New Approaches') of the London Environmental Strategy emphasises the importance of the Mayor's Healthy Streets objective and approach. Chapter 4 ('Air Quality') sets out 'Roles and Legal Duties', those for local authorities including '*improving the public realm for walking and cycling*'. The Chapter explains that actions set out within it are supported by the wider policy framework in the Mayor's Transport Strategy, which 'promotes further mode shift, tackles congestion, and encourages freight consolidation' explaining the chapter should be read alongside the Mayor's Transport Strategy.

9.4 The key findings of the GLA/TfL commissioned report include:

- In 2019, in Greater London, the equivalent of between 3,600 to 4,100 deaths (61,800 to 70,200 life years lost) were estimated to be attributable to human-made PM2.5 and NO<sub>2</sub>, on the basis that health effects exist even at very low levels. This calculation is for deaths from all causes including respiratory, lung cancer and cardiovascular deaths.
- With the adoption of the Mayor's air quality policies and taking into account general air pollution trends, the average life expectancy of a child born in London in 2013 would improve by around 5 to 6 months.
- Without the Mayor's air quality policies and other general air pollution trends, a child born in 2013 would lose 7 to 11 months life expectancy due to air pollution.
- The mortality burden in 2019 was affected by a number of factors (population size, pollution, deprivation, age of population (as baseline mortality increases with age)):
- The greatest burden, as a proportion of the population, falls in Outer London boroughs (the top three being Bromley, Barnet and Croydon), even though pollution levels there are relatively lower, mainly due to the higher proportion of the elderly in these areas.
- Conversely, Inner London boroughs had a lower burden of air pollution related mortality due to their younger age profile. However, for other air quality related health outcomes such as asthma admissions in children, boroughs with younger populations will be more affected.
- London's population would gain around 6.1 million life years if air pollution concentrations improved, per the Mayor's air quality policies scenario, from

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5

[https://www.london.gov.uk/sites/default/files/london\\_health\\_burden\\_of\\_current\\_air\\_pollution\\_and\\_future\\_health\\_benefits\\_of\\_mayoral\\_air\\_quality\\_policies\\_january2020.pdf](https://www.london.gov.uk/sites/default/files/london_health_burden_of_current_air_pollution_and_future_health_benefits_of_mayoral_air_quality_policies_january2020.pdf)

2013 to 2050, following up the population exposed for a lifetime up to 105 years after 2050.

- The gain in life expectancy from the projected future air pollution changes is less influenced by population size than the gain in life years. The life expectancy gains were larger in Inner London, including some more deprived boroughs, probably due to the greater concentration reductions in Inner London and to variations in baseline mortality rates.

## **10. CRIME AND DISORDER REDUCTION IMPACT**

10.1 No additional impact arising from the amended recommendations. See the January 2021 Report.

## **11. HEALTH IMPACT**

11.1 No additional impact arising from the amended recommendations. See the January 2021 Report.

## **12. HUMAN RIGHTS IMPACT**

12.1 No additional impact arising from the amended recommendations. See the January 2021 Report.

## **13 CRIME AND DISORDER REDUCTION IMPACT**

13.1 See the January 2021 Report.

## **14 DATA PROTECTION IMPLICATIONS**

14.1 See the January 2021 Report.

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**CONTACT OFFICER:**

Ian Plowright, Head of Transport

**APPENDICES TO THIS REPORT:**

1. Statement provided by the Joint Executive Headteacher Pegasus Academy Trust representing her personal views and those of the staff affected.
2. Email 'HARRIS CRYSTAL PALACE Against the LTN' from Eliska Finlay, and an attached message from the Head of the School
3. Revised Equality Analysis

**BACKGROUND DOCUMENTS – LOCAL GOVERNMENT ACT 1972**

Email 'Cypress Primary School Statement' 12 January from Open our Roads and attached witness statement of the Joint Executive Headteacher Pegasus Academy Trust.

Email 'concerns following on-line meeting re: Cypress Scholls' 14 January 2021 from the Executive Headteacher Pegasus Academy Trust.

Formal complaint regarding the conduct of Mr Ian Plowright and his management of the Upper Norwood and Crystal Palace consultation process and the subsequent presentation to the Transport Management Advisory Committee (TMAC) on 12<sup>th</sup> January 2021 in relation to schools.

Letter from Steve Reed MP

Letter from Ellie Reeves MP

Letter from Bromley Council Chief Executive

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Statement provided by the Joint Executive Headteacher Pegasus Academy Trust representing her personal views and those of the staff affected.

I am Lynne Sampson, Joint Executive Headteacher of The Pegasus Academy Trust. I share responsibility for the leadership and management of Cypress Primary School, Whitehorse Manor Infant School, Whitehorse Manor Junior School, Ecclesbourne Primary School and Beulah Infant School. I am writing, following comments made by Mark Averill at the online meeting on Monday 11th January. I have been contacted by some staff who were concerned that Mr Averill suggested no-one from the leadership team had responded to the on-line LTN consultation and in fact the one statement received could not be verified as true. During the consultation, I submitted a response through this email address as had staff, including the Heads, from other schools in our Trust. I am writing therefore to express concern that our responses seem not to have been considered and would like to reiterate the following.

1. The personal and professional lives of a significant number of staff working within The Pegasus Academy Trust have been greatly impacted by the closure of roads which are crucial for our work with over 2000 pupils in South Norwood and Thornton Heath.
2. Some staff are now seeking work elsewhere as they cannot manage the extended journey to and from work and when needing to travel between schools as we often need to do.
3. The impact of the road closures on staff wellbeing is enormous. The added journey times as well as the difficulties face in travelling between schools is causing stress and really impacting on the quality of education we are able to provide.
4. From a personal point of view my journey to Cypress Primary from Beckenham used to take seven-ten minutes. It now takes 25-40 minutes. I can no longer access Lancaster Road so cannot approach the school from there. I have to travel along the A213 where I can sit for up to 25 minutes in stationary traffic.
5. If I travel instead from Auckland Road the installation of the bus gate means I cannot access Cypress Road. Sometimes I park and walk to the school but have so much to carry I have to make several journeys thus making my start to the work day very laborious. I now leave half an hour earlier each morning but still arrive much later for work.
6. On December 16<sup>th</sup> 2020 I had to make three journeys from my car to the school to bring in packages, books and my own paperwork. I was doing this while trying to speak to the Heads at Ecclesbourne and Beulah Infants who needed immediate advice following positive COVID results at their school. It was extremely stressful.
7. Staff work across schools and need to travel easily and quickly from site to site. They can no longer do this. Cypress staff are particularly disadvantaged as staff from other schools who would come to offer support or attend training no longer want the challenge of the journey. I have had to appeal PCNS for teachers who have mistakenly driven through the bus gate or up Cypress Road not having registered their cars.
8. A teacher at Whitehorse Manor was called to her children's nursery as her children had fallen ill. The nursery is in Lewisham. It took her an hour and a half to reach the nursery by which time the children were extremely distressed and obviously she was as well.

9. A teacher at Whitehorse Manor has to visit her elderly parents at their care home in Streatham. The road closures mean that the round trip from her house in Bromley to school and then to the care home takes up to three hours extra per day.
10. I do not believe ANPR will improve the situation as the main problem which is inaccessibility to roads and large queues of stationary traffic will not be reduced. For the mental wellbeing of staff and to enable our schools to run effectively the only possible solution is to remove the traffic boulders particularly in Holmesdale Road and Lancaster Road.



## Plowright, Ian

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**Subject:** FW: HARRIS CRYSTAL PALACE Against the LTN  
**Attachments:** Harris Academy Statement.png

**From:**

**Sent:** 14 January 2021 14:43

**To:** Plowright, Ian <Ian.Plowright@croydon.gov.uk>; Iles, Steve <Steve.Iles@croydon.gov.uk>; Averill, Mark <Mark.Averill@croydon.gov.uk>; Jewitt, Karen <Karen.Jewitt@croydon.gov.uk>; Ryan, Pat <Pat.Ryan@croydon.gov.uk>; Ali, Muhammad <Muhammad.Ali@croydon.gov.uk>; luke.clancy@croydon.gov.uk; Neal, Michael <Michael.Neal@croydon.gov.uk>; Ali, Hamida <Hamida.Ali@croydon.gov.uk>; Kerswell, Katherine <Katherine.Kerswell@croydon.gov.uk>; steve.reed.mp@parliament.uk

**Subject:** HARRIS CRYSTAL PALACE Against the LTN

Dear officers and TMAC members as well as Hamida, Katherine and Steve,

Attached please find correspondence I have had with the head of Harris Academy. Crystal Palace, inside the LTN, who has spoken to me about the impact the LTN has had on his staff and his views on the recommendation of ANPR.

Please feel free to contact him directly should you want to speak to him in more detail.

You should hopefully also now have received an email from Lynne Sampson, the executive head of Cypress Primary School from her school email address in which she expresses the same disagreements about this LTN and the recommendation of the ANPR cameras.

I do hope that 2800+ voices, the two local Labour MPs, the CEO of Bromley, **both** schools inside the LTN and a 3:2 vote in the TMAC against this scheme gives you pause to consider that perhaps this was not the most ideal location for this LTN. Are there other ways we can all work together to help reduce traffic in this area? Are there other ways we can protect cyclists in our neighbourhood? Are there other roads that need traffic calming measures? Are there less extreme ways this can be done? As I mentioned before, I am keen to work **with** you to help understand the levers that can be used to achieve many of the goals we all have, of reducing our reliance on the car and improving the air quality in our neighbourhood.

Kind regards,

--

Eliska Finlay

[REDACTED] harriscrystalpalace.org.uk>

to me ▾

Dear Ms Finlay

The results of the consultation are very much in line with the views of our staff and I share the concerns of the Executive our staff at a time when they are already under so much pressure. Many staff have mentioned approximately 16minute academy (myself included) due to the LTN restrictions and the bottle-neck it has created in Crystal Palace. This is likely some feeling like they are unable to balance teaching as a profession with their home lives. Again, something that is not only facing a pandemic but a national shortage of teachers.

If the ANPR cameras were added and our staff (at least 120 with more who come less regularly as visitors) had access concerns and stresses but I am confident that many staff would not want to have to apply for a pass through the ANPR to work to educate our nation's next generation should not be required.

Kind regards,

[REDACTED]  
Head of Academy  
Harris City Academy Crystal Palace

**Croydon Council**  
**Equality Analysis Form**  
**Crystal Palace and South Norwood Experimental Low Traffic**  
**Neighbourhood**  
**Revision 1 (1 February 2021)**

**Stage 1**

At this stage, you will review existing information such as national or local research, surveys, feedback from customers, monitoring information and also use the local knowledge that you, your team and staff delivering a service have to identify if the proposed change could affect service users from equality groups that share a “protected characteristic” differently. You will also need to assess if the proposed change will have a broader impact in relation to promoting social inclusion, community cohesion and integration and opportunities to deliver “social value”.

Please note that the term ‘change’ is used here as shorthand for what requires an equality analysis. In practice, the term “change” needs to be understood broadly to embrace the following:

- Policies, strategies and plans
- Projects and programmes
- Commissioning (including re-commissioning and de-commissioning)
- Service Review
- Budgets
- Staff structures (including outsourcing)
- Business transformation programmes
- Organisational change programmes
- Processes (for example thresholds, eligibility, entitlements, and access criteria)

You will also have to consider whether the proposed change will promote equality of opportunity; eliminate discrimination or foster good relations between different groups or lead to inequality and disadvantage. These are the requirements that are set out in the Equality Act 2010.

**1.1 Analysing the proposed change**

**1.1.1 What is the name of the change?**

**Proposed Crystal Palace and South Norwood Experimental Low Traffic Neighbourhood**

**1.1.2 Why are you carrying out this change?**

Please describe the broad aims and objectives of the change. For example, why are you considering a change to a policy or cutting a service etc.

The change is a response to past decisions and current trends. It is a response to the Mayor of London’s Transport Strategy (in particular the Healthy Streets objective) and his / TfL’s Streetspace Plan for London. It is a response to the continuing Covid19 Pandemic and to Secretary of State for Transport statements and guidance relating to it.

Past decisions were taken without any formal consideration of the equality implications. These

include parliament in the 1930's allowing streets to be given over to motor vehicles, the consequences of which began to be considered formally in the 1960's. In 1961 Ernest Marples MP chaired a Steering Group for a Ministry of Transport study looking at the 'Long Term Problem of Traffic in Towns'. The study considered the '*Deterioration of Environment*' identifying the issues relating to '*drivers are seeking alternative routes, mainly through residential areas, in order to avoid congested areas on main roads*'. The study highlighted some of the effects this was having relating to 'age', namely children. It reported '*Journey to school. In 1962, 4,287 child pedestrians between the ages of 5 and 9 years were killed or seriously injured*'. It proposed traffic levels that were compatible with play in the street and with a reasonable quality of environment. It suggested the creation of Environmental Areas (areas free of extraneous traffic) in between the Distributor Roads which would largely need to be rebuilt as major urban highways in order to accommodate the predicted levels of traffic. This approach was clearly not fully taken forward in the UK. The response to the high road casualty rate in children age 5 to 9, has largely been to deny them access to the street and to curtail their independent mobility (unlike in the Netherlands where in response to the 'Stop Child Murder' public campaign in the 60s and early 70s, Woonerf or Living Streets in which the car is the visitor, were created).

In the early 2000s, Croydon Council led a partnership of the four Councils whose boroughs meet at the 'Upper Norwood Triangle' to deliver a Single Regeneration Budget programme. The centrepiece of the programme was a project to 'improve' the Triangle itself. Several traffic arrangements were considered. The one selected and implemented was to turn the Triangle into a one-way traffic gyratory. It was known at the time that to do so would increase the traffic going around the Triangle by around 50%. This was not because the scheme was predicted to generate more traffic, rather the same traffic would need to travel along more sides of the Triangle to get to its destination. The strategy to protect the environment within the Triangle from this increased traffic, was to use the traffic signals at each corner of the Triangle to que traffic on the approach arms to the Triangle, rather than within it. Such a strategy only works if traffic cannot find alternative routes to avoid the que, and seeks to sacrifice one 'environment' for the protection of another.

Since 2009, vehicle miles on London's streets has grown significantly. The growth has been entirely on the minor unclassified roads / streets, such that the minor street network is now carrying almost as much traffic as the A Road network.

The above changes were not subject to any formal equality assessment. The following equality analysis relates to a proposed trial project (the Crystal Palace and South Norwood Experimental Low Traffic Neighbourhood) that aims to address some of the effects arising from above.

### **1.1.3 What stage is your change at now?**

See **Appendix 1** for the main stages at which equality analyses needs to be started or updated.

The current temporary Low Traffic Neighbourhood was implemented in stages in a reactive manner as a response to the Covid19 Pandemic. Options for the future of the temporary scheme are being considered, including removal or keeping the scheme largely as is. It is proposed to move to trial LTN with camera enforced restrictions, rather than physical closures, with exemptions for vehicles belonging to residents living within the trial LTN.

## 1.2 Who could be affected by the change and how

### 1.2.1 Who are your internal and external stakeholders?

For example, groups of council staff, members, groups of service users, service providers, trade unions, community groups and the wider community.

The main internal stakeholders are the Council administered, Mobility Forum, the Cycle Forum, the Public Transport Liaison Panel, the Councilors for the Crystal Palace and Upper Norwood and the South Norwood wards, Cypress School, the SEN Transport Service, Public Health, the Active Lifestyles Service and Council contractors including Veolia.

External stakeholders include:

- Residents living within the proposed trial LTN area, those living on the main streets that form the edges of the trial LTN, and those living beyond the LTN.
- Businesses including those at the Upper Norwood Triangle
- Non-local authority schools namely Crystal Palace and South Norwood Harris Academies
- St John the Evangelist Church
- Harris Academy Crystal Palace School
- The Auckland Surgery
- St Pauls Church, Hamlet Road
- Transport for London
- The emergency services
- Bromley Council

### 1.2.2 What will be the main outcomes or benefits from making this change for customers / residents, staff, the wider community and other stakeholders?

The proposed trial is a continued response to the Covid Pandemic following the Secretary of States call for continuing action to help people to walk and to cycle rather than to use public transport or to drive. It is also intended to deliver the Mayor of London's Healthy Streets objective within the trial LTN area. It is intended to provide quieter streets facilitating healthy and active travel, play and social interaction / community building. By facilitating active travel the proposal is a part of enabling people to exercise as part of their daily travel routine, to help them be a healthy weight, to stay healthy longer, to improve air quality and to help address the climate change emergency.

**1.2.3 Does your proposed change relate to a service area where there are known or potential equalities issues?**

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. If you don't know, you may be able to find more information on the Croydon Observatory (<http://www.croydonobservatory.org/>)

Yes. It relates to:

**Public Health** and known health inequalities in Croydon, inequalities strongly associated with deprivation

<https://www.croydonobservatory.org/wp-content/uploads/2016/11/JSNA-Geographical-Health-Inequalities-2009-10.pdf> and the Health and Wellbeing Strategy aiming to tackle the inequalities <https://democracy.croydon.gov.uk/documents/s13992/Health%20and%20Wellbeing%20Strategy%20-%20Final.pdf> the objectives of which include:

- Ensure children and young people have the best physical and emotional environments for growing up.
- Reduce health inequalities by developing strong, inclusive and well-connected communities.
- Make improving mental health and wellbeing everyone's business.
- Get more people more active, more often. Reducing social isolation and driving improvement in health through social, cultural and physical activities.
- Support people to remain healthy and independent for longer by preventing the conditions that cause ill health.

**Air Quality Management** and the known (largely age related) inequalities relating to poor air quality. The Mayor of London's Environment Strategy tells us that:

- 'Human health is affected by poor air quality. This is particularly true for disadvantaged people like children, older people, and those with pre-existing health conditions.'
- '... younger children are among the most vulnerable to its health impacts. Eight and nine year-olds living in cities with high levels of fumes from diesel cars have up to ten per cent less lung capacity than normal.'
- '... air pollution has a big impact on health at all life stages, from development in the womb to the end of life. A baby born in 2010 and exposed to that same level of air quality for its entire life would lose around two years of life expectancy. .... There is also strong evidence that poor air quality affects children's lung development, and emerging evidence that improving air quality can reverse those effects. There is also increasing evidence of the link between exposure to pollution and dementia.'

Hence the relevance of the Council's Air Quality Management Plan

<https://www.croydon.gov.uk/environment/pollution/air-pollution/final-air-quality-action-plan-2017>

and in particular the action:

- 'Provision of infrastructure to support walking and cycling '

**Climate Change** and Croydon being Carbon Neutral by 2030

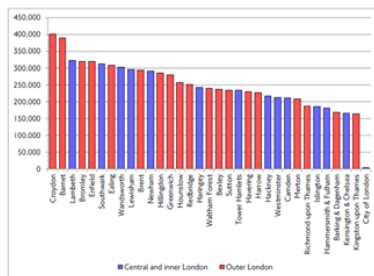
<https://www.croydonclimate.org.uk/about-croydon-climate-crisis-commission> . Unlike older people, those who are children and young people today will increasingly experience the effects of Climate Change.

**Transport Planning**

Cycling is potentially available to nearly all. TfL has assessed Croydon having the greatest Cycling Potential (largest number of journeys that could be cycled) of all London boroughs. However, Croydon has the lowest cycle mode share of all the London Boroughs at 1%. Consequently a lot of Croydon people from all groups are being denied the health, access an economic benefits of

## cycling.

Figure 4.2: potentially cyclable trips by borough of residence



It is known that there are fewer women cyclists although in Croydon more women take up Cycle Training. Children, young people, older people and members of certain BAME groups are under represented amongst cyclists.

### Disability Pave The Way, Transport for All, January 2021

Transport for All has just published its research into the experiences of people with disabilities regarding LTNs. It reports the barriers to Active Travel for disabled people are Medical, Physical (infrastructure), Financial, Attitudinal, Societal. Of the Physical / Infrastructure barriers, there are:

- Pavements cluttered by obstacles.
- Pavements that are steep, uneven, or bumpy
- The lack of dropped kerbs
- A lack of alcoves or benches mean that people are unable to stop and rest.
- Hazards - such as cycle lanes that are integrated with the pavement, or a widening gap between road and pavement
- A confusing streetscape layout, with one-way systems, poor signage, shared space and excess bollards,
- Road crossings must have appropriate tactile paving and dropped kerbs, be clear of obstruction from signs or clutter, and be at regular junctions to avoid overcrowding

The findings include

- 15% of participants raised concerns about the impact of LTNs on their ability to use taxis.
- Effect of increased journey time on visitors providing support or care 27% of participants reported concerns about an increased journey time for visitors.

The Transport for All report includes:

LTNs, in their current format, are too much 'stick' and not enough 'carrot': they bring negative impacts for those who continue to use cars, and too few incentives or changes that increase disabled people's opportunities to access Active Travel. The lack of consultation and meaningful engagement with disabled residents has created a toxic and divided atmosphere where disabled people feel ignored and demonised. However, some disabled people do benefit greatly from these schemes, and the aims of reducing pollution, reducing traffic, and reducing road danger are important to disabled people. We don't believe ripping them out and returning to normal is the way forward. Indeed, the 'normal' we had before was not accessible enough either. Instead, what we need is a series of short-term measures to address and mitigate the negative impacts arising from LTNs. This needs to happen alongside some wide-reaching long-term solutions - to address the many barriers that disabled people face to Active Travel and to encourage take up of walking, wheeling and cycling, and to create an accessible public transport system as a viable alternative to car-use. Local authorities and transport bodies alike must demonstrate that co-production with disabled people is at the heart of all consultations and policy-making.

Meaningful engagement with disabled people in the community,

Equalities analysis should be undertaken by a professional with expertise in disabled access, and coproduced with disabled residents where possible. The EQIA should be specific to the scheme, and detailed and thorough enough to identify the problematic areas and put forward solutions to mitigate impact

Accessible implementation:

- We recommend that a full audit is undertaken for each scheme to ensure compliance with accessibility standards, including preventing planters from blocking dropped kerbs, ensuring planters/bollards are placed far enough apart to allow wheelchairs through, sufficient tactile signage, etc.
- Softer approach: In some areas, it may be appropriate to trial timed closures, or alternatively a gradual phase in of restrictions (rather than all at once). This could only be done so long as these changes are communicated extremely efficiently to ensure residents are confident about what changes are happening and when.
- Dispensation for disabled people: We suggest that ANPR cameras are used to filter traffic, allowing access for specific vehicles. It is important to note that not all disabled people who require accommodations have a Blue Badge. Of our participants, only 51% hold a Blue Badge. For that reason, we recommend Local Authorities implement a scheme that grants dispensation for disabled people requiring accommodation to access their home by any vehicle they choose, including taxis. This should be independently arbitrated by an organisation or individual with expertise in access and trained in Disability Equality.

<https://www.transportforall.org.uk/wp-content/uploads/2021/01/Pave-The-Way-full-report.pdf>

**1.2.4 Does your proposed change relate to a service area where there are already local or national equality indicators?**

You can find out from the Equality Strategy <http://intranet.croydon.net/corpdept/equalities-cohesion/equalities/docs/equalitiesstrategy12-16.pdf> ). Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

**Croydon Council 'Opportunity and Fairness Plan' 2016-2020**

[https://www.croydon.gov.uk/sites/default/files/articles/downloads/Opportunity\\_and\\_Fairness\\_Plan.pdf](https://www.croydon.gov.uk/sites/default/files/articles/downloads/Opportunity_and_Fairness_Plan.pdf) In particular addresses the inequality around:

SOCIAL ISOLATION: A CONNECTED BOROUGH WHERE NO ONE IS ISOLATED

COMMUNITY COHESION: VIBRANT, RESPONSIBLE AND CONNECTED COMMUNITIES

HEALTH: HELP PEOPLE FROM ALL COMMUNITIES LIVE LONGER, HEALTHIER LIVES (in particular 'Create and develop healthy and sustainable places and communities')

[https://lbccloudadcroydongov.sharepoint.com/sites/col-15/ic/Documents/WEB\\_200009\\_Equalities\\_Annual\\_Report%202019.pdf](https://lbccloudadcroydongov.sharepoint.com/sites/col-15/ic/Documents/WEB_200009_Equalities_Annual_Report%202019.pdf)

The above three areas of inequality are interrelated. Research

<https://journals.plos.org/plosmedicine/article%3Fid=10.1371/journal.pmed.1000316#pmed-1000316-g006> indicates how that lack of social relationships is one of the biggest health risk factors

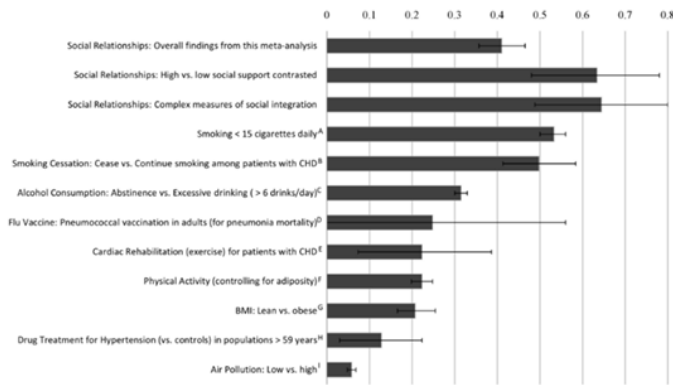


# Social Relationships and Mortality Risk: A Meta-analytic Review

Figure 6

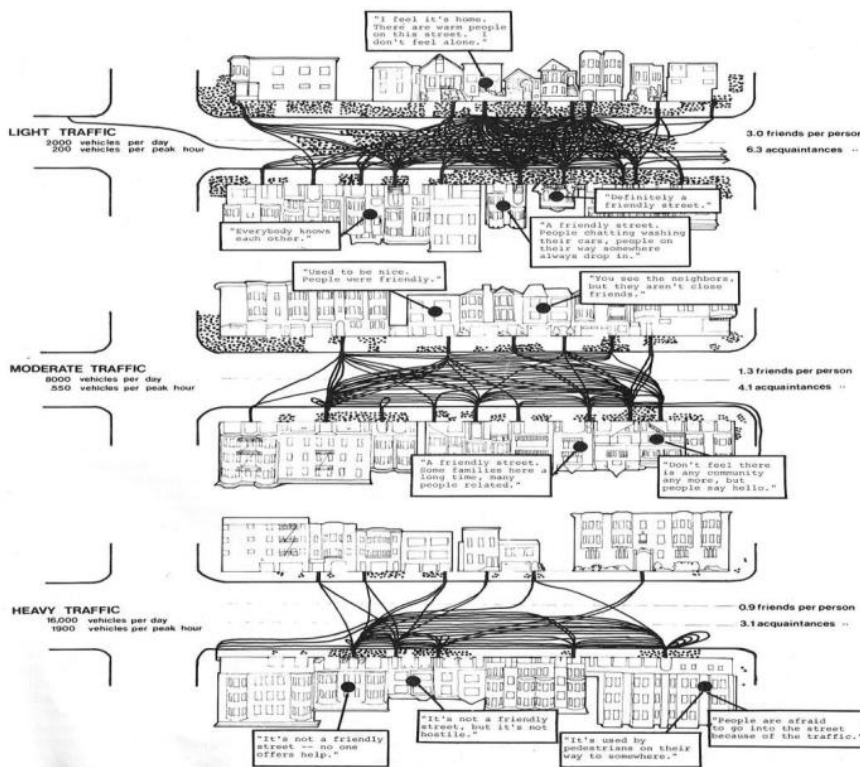
Comparison of odds (I<sup>2</sup>) of decreased mortality across several conditions associated with mortality.

Note: Effect size of zero indicates no effect. The effect sizes were estimated from meta-analyses: A = Shavelle, Paolito, Strauss, and Kush, 2008 (20); B = Critchley and Caswell, 2002 (20); C = Holman, English, Milne, and Winter, 1999 (20); D = Fine, Smith, Carson, Maffe, Sankey, Weissfeld, Desky, and Kapoor, 1994 (20); E = Taylor, Brown, Strahan, Joffe, Norman, Rees et al., 2004 (20); F = Katzmarzyk, Janssen, and Ardern, 2003 (20); G = Insua, Sacks, Lau, Lau, Retman, Pagano, and Chalmers, 1994 (21); H = Schwartz, 1994 (21).

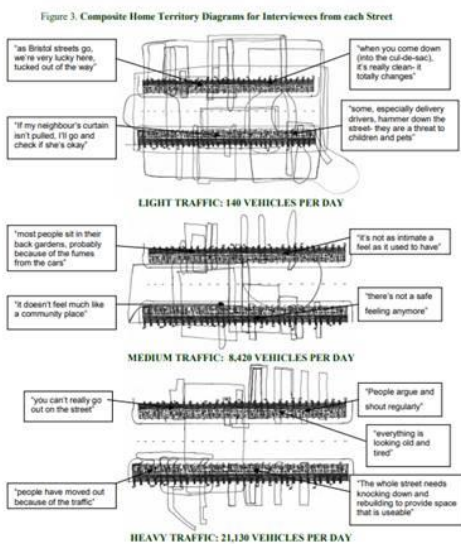


doi: <https://doi.org/10.1371/journal.pmed.1000318.g006>

The number of social relationships in turn is influenced by the speed and volume of traffic in the street where a person lives. Donald Appleyard as far back as 1969, demonstrated that people living on a street with relatively heavy traffic had only one-third as many social connections as people living on a relatively light-traffic street. Subsequent studies investigated street design, traffic, and neighbourhood quality of life; work that culminated with the publication of *Livable Streets* (Appleyard, 1981). *Livable Streets* revealed the social impacts of motor traffic in fine detail through interviews and street observations, demonstrating that casual conversations, children's play, and other street-based social life tend to be suppressed, particularly as vehicle volumes and speeds increase. The 1969 study included the iconic diagram which visually represented the erosion of social interaction as traffic volumes increase.



A decade ago, researchers replicated Appleyard's methodology in Bristol producing the report 'Driven To Excess: Impacts of Motor Vehicles on the Quality of Life of Residents of Three Streets in Bristol UK'. They reported that quality of life in cities and towns is of increasing concern to the public, and to policymakers and a major threat to quality of life is the high volume of motor vehicle traffic, associated with a wide range of mental and physical health detriments. The results confirmed that Appleyard's findings are applicable to the UK in the 21st century; specifically that the number of friends and acquaintances reported by residents was significantly lower on streets with higher volumes of motor traffic. The extent of people's 'home territories' also diminished as motor traffic increased. Other notable outcomes from the research include the finding that individuals' perceptions of road safety in their neighbourhood may be disproportionately influenced by the traffic conditions on their street of residence, especially affecting the degree of independence granted to children.



### TfL's 'Attitudes Towards Walking: Segmentation Study' (2014)

<http://content.tfl.gov.uk/attitudes-to-walking-2014-summary.pdf> reports on the key 'drivers' of walking. These are gender, age & lifestage, car ownership, income and whether live in central, inner or outer London, concluding:

I Females travel more stages per day and walk more stages per day compared to males, although females travel and walk a shorter distance per stage compared to males

I People aged 20-44 walk more stages per day than older people

I Combining age and gender makes the differences greater (see Figure 2):

■ Females aged 20-44 walk the most stages per day. There is a particular difference in walking activity between females and males aged 35-44

I Lifestage appears to be a key differentiating factor:

■ Single adults, with or without children, walk more stages per day than adults in couples

I Further differences are seen by gender

■ Males in a couple with children walk the fewest stages per day, particularly compared to single adult males

■ Females with children, either in a couple or single, walk more than those without children

TfL undertook an annual Attitudes Towards Cycling survey <http://content.tfl.gov.uk/attitudes-to-cycling-2016.pdf> which contains a good many indicators relating to gender, age ethnicity

### Profile of cyclists (Sept 2016)



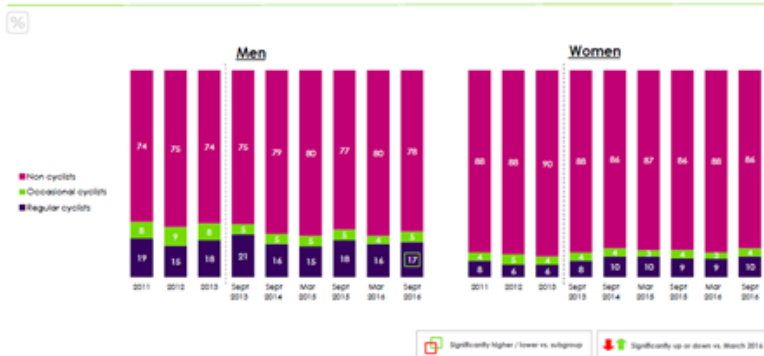
### Profile of cyclists (Sept 2016)



Demographic questions  
Base: All - Sept 2016

33

### Profile of cyclists (trend)

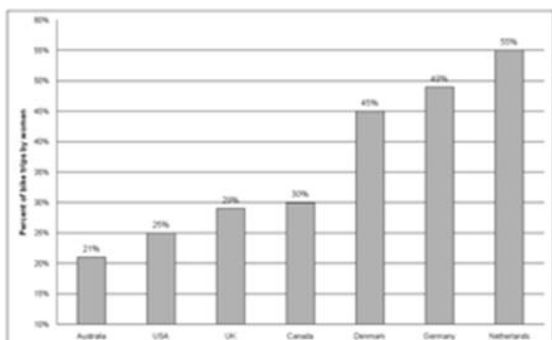


Percentage able to ride a bike (Sept 2016)



GBHEI: Can you ride a bicycle?  
 Base: All respondents Sept 2016 (2016)

The study ‘**Making Cycling Irresistible: Lessons from The Netherlands, Denmark and Germany**’, JOHN PUCHER and RALPH BUEHLER (2008) looked at gender and age differences in cycling across countries. On the difference rates of cycling amongst men and women, the study reported that not only do the Netherlands, Denmark and Germany have high and growing levels of cycling, but their cyclists comprise virtually all segments of society. Women are just about as likely to cycle as men, making 45% of all bike trips in Denmark, 49% in Germany and 55% in the Netherlands.

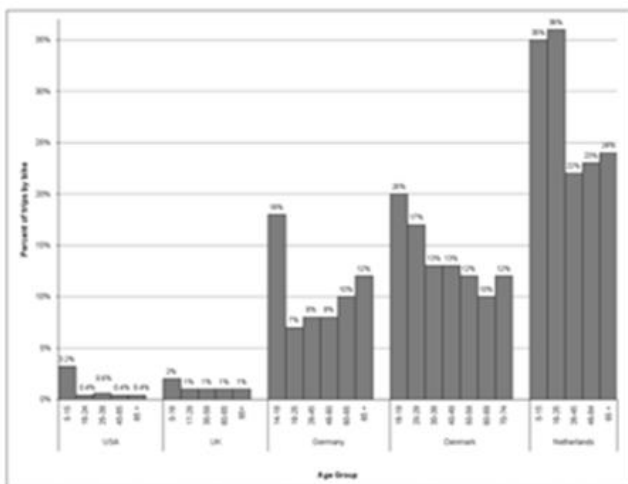


Sources: German Federal Ministry of Transport (2003); U.S. Department of Transportation (2003); Danish Ministry of Transport (2005); Statistics Netherlands (2005); Australian Bureau of Statistics (2007); Department for Transport (2007) and information provided directly by bike planners in Canadian provinces and cities

Figure 8. Women’s share of total bike trips in Australia, the USA, the UK, Canada, Denmark, Germany and the Netherlands (2000-2005).

While cycling is gender-neutral in those three countries, men dominate cycling in the UK and the USA, where they make 72% and 76% of all bike trips, respectively.

Regarding ‘age’ the study reported that another dimension of cycling’s universality in the Netherlands, Denmark and Germany is the representation of all age groups. Children and adolescents have the highest rates of cycling in almost every country. As shown in Figure 9, however, cycling levels in the Netherlands, Denmark and Germany remain high even among the elderly. In Germany, the bike share of trips rises steadily from 7% among 18- to 24-year olds to 12% for those 65 and older. The bike share of trips declines with age in Denmark, but even among those aged 70–74 years old, cycling accounts for 12% of all trips, the same as among Germans who are 65 and older. The Dutch elderly double that percentage, making 24% of all their trips by bike. Cycling rates are low for all age groups in the USA, but they also decline with age: from 3.2% among children 5–15 years old to only 0.4% of trips for those 40 and older. Similarly, the bike share of trips falls from 2% among British children to 1% among older age groups. The bike share of trips for the Dutch elderly is 24 times higher than for British elderly. The bike share of trips for both the German and Danish elderly is 12 times higher than for British elderly.



Sources: German Federal Ministry of Transport (2003); U.S. Department of Transportation (2003); Danish Ministry of Transport (2005); Statistics Netherlands (2005); Department for Transport (2007)

Figure 9. Bicycling share of trips by age group in the USA, the UK, Germany, Denmark and the Netherlands (2000-2002).

### Age Differences in Independent Mobility

The Policy Studies Institutes study 'Children's Independent Mobility: A Comparative Study in England and Germany 1970 – 2010'

[http://www.psi.org.uk/images/uploads/CIM\\_Final\\_report\\_v9\\_3\\_FINAL.PDF](http://www.psi.org.uk/images/uploads/CIM_Final_report_v9_3_FINAL.PDF)

reported on the dramatic decline in children's independent mobility in England relative to Germany and the psychological and other consequences this was having for English children. The study also looked at race and gender difference in children's independent mobility.

The Policy Studies Institute (and others) has continued to research this topic including a study <https://www.nuffieldfoundation.org/project/independent-mobility-and-child-development-2> which looked at the degree to which children of different ages have the freedom to travel to school, friends, shops and other destinations unaccompanied by adults across ten countries in order to identify factors affecting the independent mobility of children and the implications for child development.

### Summary of results

- Overall, Finland is the top-performing country across almost every independent mobility indicator in this study, coming second only to Germany for children's self-reported freedom to travel on local buses alone.
- In 2013, Unicef published a comparative overview of child well-being across twenty-nine OECD and EU countries (Unicef, 2013) using national data from 2009 and 2010, coinciding with the start of data collection for this study of children's independent mobility. The Policy Studies Institute report found that there is a positive correlation between Unicef well-being scores and the rank scores measuring children's degree of freedom to travel and play without adult supervision in these countries. There is also a positive correlation between the education attainment of children, based on national Programme for International Student Assessment (PISA) rankings in 2009 and children's degree of freedom to travel and play without adult supervision in these countries.
- Of the three factors examined, traffic seems to be the strongest factor affecting the granting of independent mobility, with 'strangers' showing a weak effect and community supervision not being a factor. However, the correlation between traffic deaths and the ranking of countries for independent mobility is weak. On the other hand, almost all of the countries with the highest levels of children's independent mobility have national policies to promote walking or cycling, and the local authorities in these countries are permitted to set lower speed limits than those defined at the national level.

Arising from the research findings and discussion, the report makes four observations and seven

recommendations.

### Observations

1. Unsafe environments for children are widely tolerated
2. Withholding independent mobility may only defer risk to older children
3. Action is needed to address parental concerns, road user behaviour, the physical environment, social and cultural factors
4. Change in transport policy and behaviour may be resisted but it actually happens all the time

### Recommendations

1. Implement and enforce stringent road safety measures
2. Reduce car dependency and the dominance of traffic in the public realm
3. Put the needs of children at the heart of urban development ' cities that work for children, work for everyone
4. Explicitly incorporate children's independent mobility into policy
5. Adopt Daylight Saving Time to allow children to better utilise daylight hours and reduce road casualties
6. Invest in research to consolidate and develop knowledge on children's independent mobility
7. Create a national challenge fund to catalyse and drive action to improving children's independent mobility

## Cycling by People with a Disability

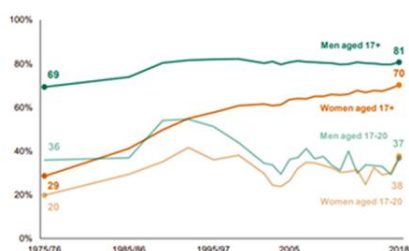
The Wheels for Wellbeing annual survey 'Assessing the needs and Experiences of Disabled Cyclists' (2018) <https://wheelsforwellbeing.org.uk/wp-content/uploads/2019/04/Survey-report-FINAL.pdf> was based on responses from over 200 disabled cyclists across the UK. It reports that 72% of disabled cyclists use their bike as a mobility aid, and 75% found cycling easier than walking. Survey results also show that 24% of disabled cyclists bike for work or to commute to work and many found that cycling improves their mental and physical health. Inaccessible cycle infrastructure was found to be the biggest barrier to cycling.

## Age and Gender Difference in Travelling

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/823068/national-travel-survey-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/823068/national-travel-survey-2018.pdf)

In England as a whole, the percentage of women having a driving licence has increased considerably since the mid 1970's but is still below the percentage of men. The trend is different amongst the youngest drivers.

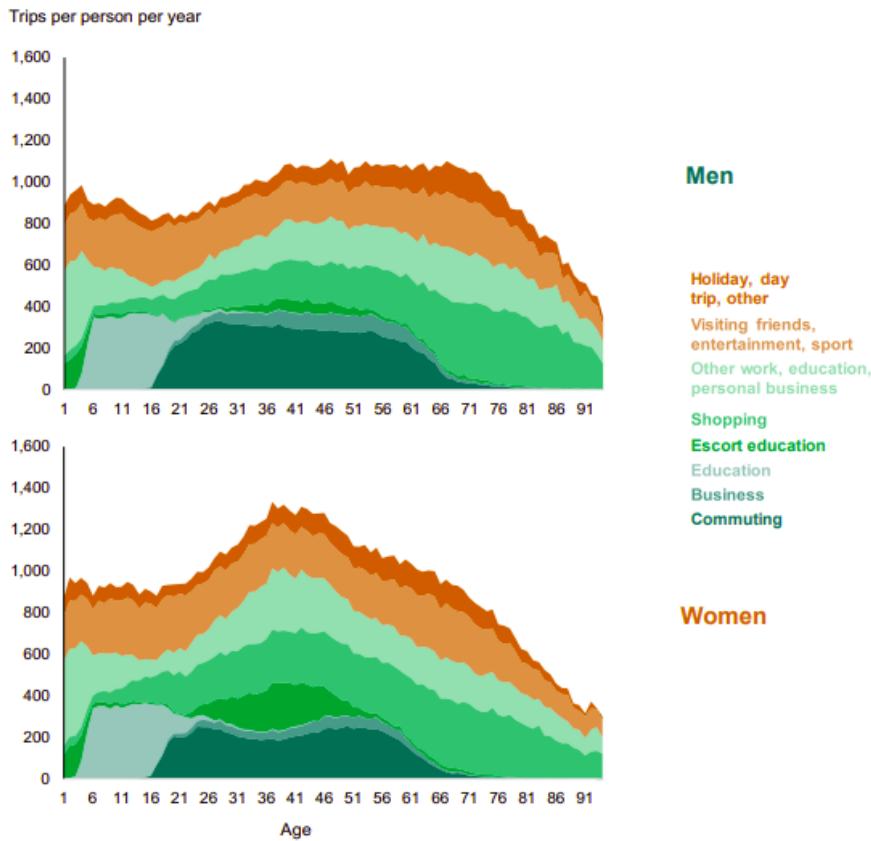
Chart 5: % of people owning a full driving licence: England 1975/76-2018 [NTS0201]



Older women make fewer journeys than older men. Women make more journeys escorting children to education



**Chart 22: Average trips per person per year, by purpose, age and gender: England 2002/2018 average [based on NTS0611]**



‘Young People’s Travel – What’s Changed and Why? Review and Analysis’ (2018)

<https://www.gov.uk/government/publications/young-peoples-travel-whats-changed-and-why>

Young adults (age 17 to 29) in Great Britain and other countries are driving less now than young adults did in the early 1990s.

### Travel in London: Understanding our diverse communities 2019

<http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>

This TfL document contains information on a series of equality indicators. Some example extracts are shown below

#### Frequency of walking (2016/17) [11]

%	All	White	BAME	Black	Asian	Mixed	Other
<b>Base</b>	<b>(17,560)</b>	<b>(11,173)</b>	<b>(6,099)</b>	<b>(1,984)</b>	<b>(3,049)</b>	<b>(470)</b>	<b>(596)</b>
5 or more days a week	84	82	86	86	86	87	82
3 or 4 days a week	5	6	5	4	5	4	6
2 days a week	4	4	3	4	3	2	2
1 day a week	2	3	2	2	2	2	3
At least once a fortnight	0	0	0	0	0	0	1
At least once a month	1	1	0	0	0	0	0
At least once a year	0	0	0	0	0	1	0
Not used in last year	1	1	1	1	1	0	0
Never used	3	3	2	2	2	5	5

LTDS data in this report excludes children aged under five.

**Proportion of Londoners (aged 17+) with a full car driving licence (2016/17) [11]**

%	All	White	BAME	Black	Asian	Mixed	Other
<b>Base</b>	<b>(14,899)</b>	<b>(9,831)</b>	<b>(4,831)</b>	<b>(1,554)</b>	<b>(2,501)</b>	<b>(308)</b>	<b>(468)</b>
Holds a full car driving licence	65	71	54	48	57	57	55

Figures include all Londoners aged 17 and over.

**Household access to a car (2016/17) [11]**

%	All	White	BAME	Black	Asian	Mixed	Other
<b>Base</b>	<b>(17,560)</b>	<b>(11,173)</b>	<b>(6,099)</b>	<b>(1,984)</b>	<b>(3,049)</b>	<b>(470)</b>	<b>(596)</b>
0 cars	35	35	36	45	27	41	44
1 car	44	44	44	42	47	41	40
2+ cars	21	21	20	13	26	18	16

LTDS data in this report excludes children aged under five.

**Proportion of Londoners who cycle (November 2017) [16]**

%	All	White	BAME
<b>Base</b>	<b>(2,367)</b>	<b>(1,597)</b>	<b>(770)</b>
Cyclist (used a bike to get around London in the last 12 months)	17	18	17
Non-cyclist (not used a bike to get around London in the last 12 months)	83	82	83

**Dial-a-Ride membership by ethnicity (2016) [2, 30]**

%	All disabled Londoners	Dial-a-Ride members	65-79 years-old	80-89 years-old	90+ years old
<b>Base (excludes unknown data)</b>	-	<b>(39,166)</b>	<b>(9,404)</b>	<b>(14,177)</b>	<b>(8,573)</b>
White	66	68	56	72	88
BAME	34	32	44	28	12

**Proportion of Londoners using types of transport at least once a week (2016/17) [11]**

%	Disabled	Disabled 16-64	Disabled 65+	Non-disabled (All)	Non-disabled 65+
<b>Base</b>	<b>(1,729)</b>	<b>(789)</b>	<b>(863)</b>	<b>(15,831)</b>	<b>(1,828)</b>
Walking	81	88	70	96	95
Bus	58	64	48	60	72
Car (as a passenger)	42	40	41	45	41
Car (as a driver)	24	26	25	39	52
Tube	21	30	13	43	35
National Rail	9	12	5	17	15
Overground	7	10	3	12	8
PHV (minicab)	10	12	8	10	4
Taxi (black cab)	3	3	3	2	2
DLR	3	5	2	5	1
Tram	2	3	1	2	2
Motorbike	-	1	-	1	1
Net: Any public transport (bus, Tube, National Rail, DLR, London Overground, tram)	61	69	52	74	78

LTDS data in this report excludes children aged under five.



**1.2.5 Area Baseline:** The Croydon Observatory Custom Area Reporter enables selected information to be extracted based on small output areas. Those areas cannot exactly equate to the area of the notional boundary of the temporary and proposed trial LTN. The areas selected / approximating to the LTN and for which data have been extracted, are indicated below in purple.



### Car Availability



1%

Households with 4+ cars or vans  
(2011) [View metadata \(00846\)](#)

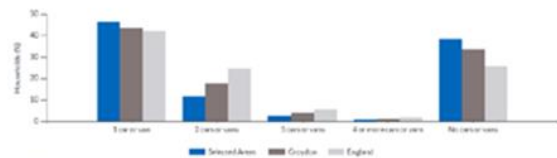


39%

Households with no car/van  
(2011) [View metadata \(00846\)](#)

39% of households have no car available

Number of cars or vans per household



Source: ONS Census 2011

	Selected Areas		Croydon		England	
	Count	%	Count	%	Count	%
1 car or van	1,274	40.6	63,183	43.6	9,201,776	42.2
2 cars or vans	317	11.6	25,836	17.8	5,441,392	24.7
3 cars or vans	48	2.5	5,571	3.8	1,203,865	5.3
4 or more cars or vans	23	0.6	1,887	1.3	424,883	1.9
No cars or vans	1,053	38.5	48,523	33.5	5,691,251	25.8

### Health and Disability



50%

Population with very good health  
(2011) [View metadata \(120753\)](#)



1%

Population with very bad health  
(2011) [View metadata \(120754\)](#)



6%

Population whose activity is limited a lot  
(2011) [View metadata \(11263\)](#)

### Age



23%

Percentage of the population aged 0-17  
(2019) [View metadata \(121474\)](#)

### Gender



6,301

Total population estimate  
(2019) [View metadata \(1351\)](#)



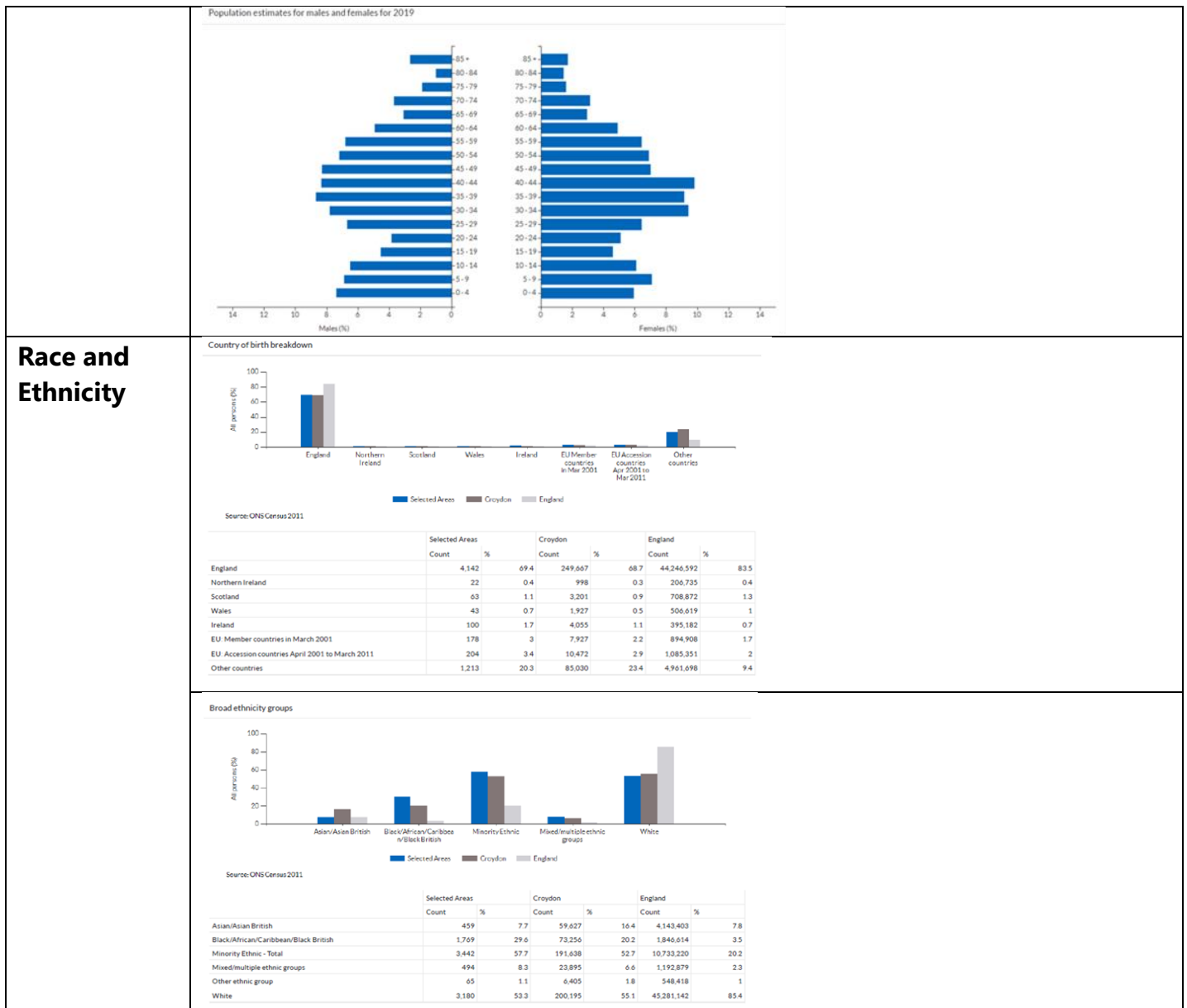
3,034

(48.2%)  
Male population estimate  
(2019) [View metadata \(1234\)](#)



3,267

(51.8%)  
Female population estimate  
(2019) [View metadata \(1117\)](#)



**1.2.6 Analyse and identify the likely advantage or disadvantage associated with the change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a “protected characteristic”**

Please see Appendix 2 (section 1) for a full description of groups.

	<b>Likely Advantage</b> 😊	<b>Likely Disadvantage</b> ☹️
Disability	Under the proposed trial, residents living within the notional LTN area, having a car registered to their home address and needing to use a car, will be able to use their car with the same ease they enjoyed before the temporary LTN was introduced.  A number of people and the	In 2011, the percentage of people living in the area with very bad health or whose activity was limited a lot, was 7%. The proposal is intended to help people choose to travel actively to help stay healthy longer. For those that already are in very bad health and needing care, the proposed trial restriction on motor vehicles includes an

	<p>Auckland Surgery have pointed out the need for some older and disabled residents living outside of the LTN area to access the Surgery by car. By moving the bus gate to be by the Surgery, patients will be able to drive to it from either direction in Auckland Road.</p> <p>People with disabilities who currently cycle will be aided by the proposal as will those that do not currently cycle but would like to.</p> <p>Users of the Disabled Persons Freedom Pass should enjoy a quicker and more reliable journey on the 410 as it passes through the trial LTN area. TfL's monitoring of the Temporary scheme suggests that buses on routes bounding the Temporary LTN were not significantly affected by the temporary scheme, compared to the effect of the temporary scaffolding in Church Road.</p> <p>Users of Dial-a-Ride and SEN Transport buses, and people with a disability using Community Transport, should have a quicker and more reliable journey via Auckland Road.</p> <p>Taxicard users will have an improved journey via Auckland Road if in a Taxi during the Experimental LTN compared with the Temporary LTN. If in a Private Hire vehicle, they will not be able to pass through the 'bus gate' necessitating a different route.</p>	<p>exemption for district nurses. However, not all carers will be provided with an exemption and for some accessing particular premises by car will require a longer route.</p> <p>People with a disability living beyond the trial LTN area, reliant on cars for travel, needing to access premises within the trial LTN area, may have to take a longer route compared to those walking, cycling or using the 410 bus.</p> <p>People with a disability living beyond the trial LTN area, reliant on cars for travel who previously used Auckland Road to avoid congestion on the A Roads, would not be able to. However in this respect, they would not be disadvantaged relative to non-disabled people living beyond the LTN.</p> <p>Users of Dial-a-Ride and SEN Transport buses, and people with a disability using Community Transport, may have an increased journey time, if the journey previously involved going via streets that will be subject to the 'No Motor Vehicle' restrictions.</p> <p>SEN Transport drivers using cars, and Private Hire cars hired for SEN Transport will not be able to pass through the 'No Motor Vehicle' restrictions. Those using taxis and minicabs may incur extra journey distance, time and cost if taxis and minicabs are unable to pass through all the camera enforced restrictions.</p>
Race/ Ethnicity	None specific (see community Cohesion)	None specific
Gender	TfL's Attitudes to Walking study indicates that women travel more stages per day and walk more stages per day compared to men, although women travel and walk a	None specific

	<p>shorter distance per stage compared to men. Men and women should both be helped by the improved walking environment, but helped differently. Women helped to make the more frequent but shorter trip stages they walk.</p> <p>Both the TfL Attitudes to Cycling research and Sustrans' 'What Stops Women Getting on Their Bikes' study, report that fear of road danger is the biggest thing deterring women cycling. Providing quieter and safer street space is intended to address this.</p>	
Transgender	None specific	None specific
Age	<p>The proposed trial is intended to create a network of quieter and safer streets to foster walking and cycling. Children and young people are amongst those likely to be benefiting the most. A quarter of the population in the Trial LTN area is under the age of 18 and consequently cannot drive. Many will be living in the households in the area which do not have access to a car or a van. Nationally, young adults are significantly less likely to hold a driving licence and driving less than they did in the past. Aiding walking and cycling including to public transport will benefit this group.</p> <p>Children are the group whose independent mobility has been curtailed the most as streets have been taken over by more and more cars. Providing quieter and safer streets provides space in which children can more easily regain their independent mobility, play and socialise. The same quieter streetspace can help them get a little closer to the levels of cycling seen amongst their north European counterparts.</p>	None specific. Disadvantage may be Disability related. See 'Disability above'

	<p>Quieter streets may well be a factor in enabling older people to keep cycling or to choose cycling and could help the percentage of cycle trips made by older people get a little closer to some of those in northern Europe, something made feasible at Crystal Palace my modern E-bikes.</p> <p>The degree to which children's access to active travel and to play in the street puts them at risk of being overweight and associated medical conditions, both in childhood and later in life. Behaviours (including travel behaviour) learnt in childhood are often taken into later into life. Facilitating active travel in early life is part of ensuring good health as an adult and older adult.</p> <p>The Mayor's Healthy Streets objective is a key part of his approach to tackling climate change. Those that are young today, are the ones that will be experiencing the worst effects of climate change when older adults.</p> <p>As people get older, particularly beyond the age of 70 when the driving licence has to be renewed every five years, fewer may have driving licenses / be driving.</p>	
Religion /Belief	None specific	None specific
Sexual Orientation	None specific	None specific
Pregnancy and Maternity	Information has not been found specifically relating to Pregnancy and Maternity. However TfL's Attitudes Towards Walking research indicates that women with children, either in a couple or single, walk more than those without children, and it is likely that amongst these women, some will be pregnant and / or in maternity	Some women in the latter stages of pregnancy, may feel walking is difficult, but If they have a car available may still be able to drive. Those living outside of the trial LTN area but needing to reach premises within the LTN may have an extended driving route / journey time but will still have access.
Social inclusion issues	The work of Appleyard in the 1960s and replicated in Bristol a	Many living outside of the trial LTN may wish to drive to visit a friend or

	decade ago shows how the number of friends and acquaintances a resident of a street has declines, as the volume of traffic increases. Creating a quieter and calmer street environment is a means of increasing social inclusion and reducing isolation.	relative living within the LTN. If they chose to do so, they will still be able to do so, but the journey time / distance might be increased.
Community Cohesion Issues	See above. The street has historically been where much of the life of the town/city takes place. It was community space which also happened to have a movement function. Lowering traffic levels has the potential for the role of the street as community space to return to a degree depending on the residual traffic level. This in turn fosters community cohesion and enables the fostering of good relations between members of groups with protected characteristics and others (something difficult to achieve if everyone travels to and from their own home, in their own car).	See above
Delivering Social Value	The trial project is intended to support delivery of the Mayors Health Streets objective, in turn delivering value and savings in relation to mental and physical health	None

<b>1.2.7</b>	<p><b>In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider?</b></p> <p>For example, geographical / area based issues, strengths or weaknesses in partnership working, programme planning or policy implementation</p>
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Crystal Palace is at the top of a hill. There is likely to be need for additional action to help people consider the use of E-Bikes. Also the need for seating/rest spaces especially in Auckland Road

<b>1.2.8</b>	<p><b>Would your proposed change affect any protected groups more significantly than non-protected groups?</b></p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix.....</p>
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Yes. The project is intended have a significant positive effect on children and young people.

**1.2.9 As set out in the Equality Act, is your proposed change likely to help or hinder the Council in advancing equality of opportunity between people who belong to any protected groups and those who do not?**

In practice, this means recognising that targeted work should be undertaken to address the needs of those groups that may have faced historic disadvantage. This could include a focus on addressing disproportionate experience of poor health, inadequate housing, vulnerability to crime or poor educational outcomes *etc.*

**Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.**

Yes. The project is intended to increase the opportunity for children to travel independently and to socialise and play.

**1.2.10 As set out in the Equality Act, is the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic?**

In practice, this means that the Council should give advance consideration to issues of potential discrimination before making any policy or funding decisions. This will require actively examining current and proposed policies and practices and taking mitigating actions to ensure that they are not discriminatory or otherwise unlawful under the Act

**Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.**

Do Not Know. No means have been identified by which the trial scheme might help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic.

**1.2.11 As set out in the Equality Act, is your proposed change likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not?**

In practice, this means taking action to increase integration, reduce levels of admitted discrimination such as bullying and harassment, hate crime, increase diversity in civic and political participation *etc.*

**Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response**

Yes. The proposed change has the potential to very strongly help foster good relations between people who belong to most of the protected groups and those who do not, by better enabling friendships and acquaintances to develop in streets with less traffic, and enabling the street to regain some of its historic community space function.

### 1.3 Decision on the equality analysis

If you answer "yes" or "don't know" to ANY of the questions in section 1.2, you should undertake a full equality analysis. This is because either you already know that your change or review could have a different / significant impact on groups that share a protected characteristic (compared to non-protected groups) or because you don't know whether it will (and it might).

Decision	Guidance	Response
<p><b>No, further equality analysis is not required</b></p>	<p>Please state why not and outline the information that you used to make this decision. Statements such as 'no relevance to equality' (without any supporting information) or 'no information is available' could leave the council vulnerable to legal challenge.</p> <p><b>You must include this statement in any report used in decision making, such as a Cabinet report</b></p>	
<p><b>Yes, further equality analysis is required</b></p>	<p>Please state why and outline the information that you used to make this decision. Also indicate</p> <ul style="list-style-type: none"> <li>• When you expect to start your full equality analysis</li> <li>• The deadline by which it needs to be completed (for example, the date of submission to Cabinet)</li> <li>• Where and when you expect to publish this analysis (for example, on the council website).</li> </ul> <p><b>You must include this statement in any report used in decision making, such as a Cabinet report.</b></p>	<p>The Analysis should be further informed by research conducted during the trial, research focused on the experiences of those of groups with protected characteristics predicted to be affected by the trial.</p> <p>There should be a dialogue with Dial-A-Ride, Community Transport and SEN Transport operators and with users to help refine the operation of the trial and this Analysis.</p> <p>The Croydon Mobility Forum has been unable to meet during the Pandemic. The Forum should be engaged with during the operation of the trial, its views informing the Analysis, the operation of the trial and the design and operation of any scheme that might follow the trial</p>



Decision	Guidance	Response
		The Equality Analysis should be concluded before any decision is made on the outcome of and the future for the trial and should be published as part of the documents used in making the recommendation.
<b>Officers that must approve this decision</b>	<b>Name and position</b>	<b>Date</b>
<b>Report author</b>	Ian Plowright, Head of Transport	1 February 2021
<b>Director</b>	Steve Iles, Director of Public Realm	5 February 2021

#### 1.4 Feedback on Equality Analysis (Stage 1)

**Please seek feedback from the corporate equality and inclusion team and your departmental lead for equality (the Strategy and Planning Manager / Officer)**

A Full analysis is required because we already know that the change could have a different / significant impact on individuals with disabilities. A full analysis will enable us the Council to ensure the decision is informed by research conducted during the trial, research focused on the experiences of those of groups with protected characteristics predicted to be affected by the trial. This will provide the opportunity for those most likely to be impacted by the trial to informing the Analysis, the operation of the trial and the design and operation of any scheme that might follow the trial

<b>Name of Officer</b>	Yvonne Okiyo	
<b>Date received by Officer</b>	01.02.2021	Please send an acknowledgement
<b>Should a full equality analysis be carried out?</b>	Yes	.

## **2 Use of evidence and consultation to identify and analyse the impact of the change**

### **Use of data, research and consultation to identify and analyse the probable Impact of the proposed change**

This stage focuses on the use of existing data, research, consultation, satisfaction surveys and monitoring data to predict the likely impact of proposed change on customers from diverse communities or groups that may share a protected characteristic.

Please see Appendix 2 (section 2) for further information.

<b>2.1</b>	<b>Please list the documents that you have considered as a part of the equality analysis review to enable a reasonable assessment of the impact to be made and summarise the key findings.</b>
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	This section should include consultation data and desk top research (both local and national quantitative and qualitative data) and a summary of the key findings.
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Documents are referenced in section 1 above. The results of the consultation, feedback prior to the consultation and feedback at the Traffic Management Advisory Committee have also been used

In summary key findings include:

- Children and young people are the ones who's independent mobility has been curtailed the most by changes in the way streets are managed and used, and consequently are amongst those potentially benefitting the most from Low Traffic Neighbourhoods
- Just under a quarter of the population within the area of the proposed Experimental LTN are under the age of 18 and consequently do not drive
- Young adults are less likely than older adults to have a driving licence or own a car
- The residents and business consultations on the future for the Temporary LTN failed to reach children and many young people.
- High traffic streets / low people streets impact on Community cohesion and on mental health
- In northern Europe more people cycle when they children and when they are late in life.
- The temporary LTN is likely to have led to increased journey distance and times for disabled people using Minicabs, taxis, Dial-a-Ride, Community Transport and SEN Transport. It is also likely to be causing increased journey time and distance for those care givers traveling to attend to the needs of sick and disabled residents within the Temporary LTN. Those who have a blue badge permit are also likely to have experienced increased journey times when trying to travel into or out of the Temporary LTN by car.

**2.2 Please complete the table below to describe what the analysis, consultation, data collection and research that you have conducted indicates about the probable impact on customers or staff from various groups that share a protected characteristic.**

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
Age	<p>Children and young people are the ones who's independent mobility has been curtailed the most by changes in the way streets are managed and used, and consequently are amongst those potentially benefitting the most from Low Traffic Neighbourhoods in terms of independent mobility and also enjoying the mental and physical health benefits of active travel, now and in later life when they take learned travel habits into the future.</p> <p>Just under a quarter of the population within the area of the proposed Experimental LTN are under the age of 18 and consequently do not drive. Young adults are less likely than older adults to have a driving licence or own a car. Hence these groups are expected to benefit from measures to assist travel by means other than the car.</p> <p>Walking is the most frequently used mode of transport including amongst those over 80. Frequency of travel as a car passenger and as a car driver is considerably lower than the frequency of walking trips. Frequency of travel as a car passenger remains fairly constant across the age ranges. Frequency of travel as a car driver peaks at the age 65-69 but declines rapidly by the age 80+ reflecting the rapid decline in driving licence holding over the age of 80+. The age range 65-69 is also when frequency of walking trips peaks.</p>	<p>The residents and business consultations on the future for the Temporary LTN failed to reach children and many young people.</p> <p>See left</p>	<p>See the various sources in section 1.</p> <p>Consultations</p> <p>Travel in London: Understanding our diverse communities 2019, TfL</p>

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
Disability	<p>The most frequently used form of transport used by disabled people is walking. The frequency of cycling amongst disabled and non-disabled people are similar. Initiatives such as the proposed Experiment LTN intended to help people choose to walk and cycle are likely to benefit both disabled and non-disabled people</p> <p>Helping people to choose to travel actively is intended to help them stay healthy and to stay healthy for longer helping to prevent the development of disabilities including those that potentially arise from diabetes.</p> <p>Active travel helps to improve mental wellbeing as does reducing traffic in streets, in turn allowing greater community cohesion. Both can help tackle mental health problems.</p> <p>Increased space for cycling infrastructure helps to support the use of adapted and non-standard bikes and trikes.</p> <p>72% of disabled cyclists use their bike as a mobility aid, and 75% found cycling easier than walking. Measures to assist cycling, if implemented well will increase the independent mobility of disabled people who cycle.</p>	<p>The current Temporary LTN can result in longer journeys for disabled people using taxis, minicabs, dial-a-ride, SEN Transport Service vehicles and community transport minibuses</p> <p>Concern has been expressed at the increased journey time and distance incurred by some care givers attending residents with the Temporary LTN</p> <p>The current Temporary LTN has made it more difficult for some people reliant on the car to access the Auckland Surgery</p> <p>Drivers with Blue Badge permits living beyond the boundary of the LTN and needing to access people and places within the LTN may have increased journey time and distance.</p>	<p>Travel in London: Understanding our diverse communities 2019, TfL</p> <p>TfL Attitudes Towards Cycling</p> <p>Consultation response and other feedback</p> <p>'Assessing the needs and Experiences of Disabled Cyclists' Wheels for Wellbeing</p>
Gender	<p>Women travel more stages per day and walk more stages per day compared to men, although women travel and walk a shorter distance per stage compared to men. Men in a couple with children walk the fewest stages per day, particularly</p>	<p>Walking is the most frequently used mode of travel for both women and men. Men drive more frequently. Women more frequently travel as car passengers than men. The use of</p>	<p>Travel in London: Understanding our diverse communities 2019, TfL</p> <p>TfL's 'Attitudes Towards Walking:</p>

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
	<p>compared to single adult men. Women with children, either in a couple or single, walk more than those without children</p> <p>Women and men are expected to benefit from an improved walking environment but perhaps somewhat differently.</p> <p>More men currently cycle than do women. Consequently more men are likely to benefit from the proposed Experimental LTN</p> <p>Women are expected to be amongst those benefiting from the improved walking and cycling as they make more trips for escort education</p>	<p>cars by both men and women is likely to be affected by the proposed Experimental LTN. However, the majority of journeys made by car in London are short journeys. The proposed Experimental LTN is intended to help men and women to choose to travel actively rather than use the car for short trips, with the intention of benefiting the health of both</p> <p>Fewer women cycle than do men. However, the most common reason given by women for not cycling is fear of road danger. Creating quieter streets is intended to help women choose to cycle</p> <p>Women are more likely to escort school children to their educational establishments. Therefore it is women who are more likely to have to reconsider their travel behaviours.</p>	<p>Segmentation Study'</p> <p>TfL's 'Attitudes Towards Cycling' reports</p>
Race/ Ethnicity	<p>The frequency of walking trips is consistently high across all ethnic groups. However, walking at least once a week to</p> <ul style="list-style-type: none"> <li>• get to work / school / college</li> <li>• visit friends and relatives</li> <li>• take a child to school</li> </ul> <p>is considerably higher amongst members of BAME groups than amongst White Londoners</p>	<p>BAME Londoners are less likely than white Londoners to say that they feel safe from accidents when walking around London during the day. People from BAME groups may not feel as inclined to walk or cycle within the proposed Experimental. The effect on perceptions of Road Safety /Road danger amongst members of</p>	<p>Travel in London: Understanding our diverse communities 2019, TfL</p>

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
		BAME groups should form part of the monitoring of the Experimental LTN	
Pregnancy and maternity	Pregnant women are not expected to benefit directly from the proposed Experimental LTN other than having a quieter street environment in which they can choose to take exercise close to home. However they are expected to benefit from the proposed installation of temporary 'parklets' incorporating seating in Auckland Road.		

**2.3** Are there any gaps in information or evidence missing in the consultation, data collection or research that you currently have on the impact of the proposed change on different groups or communities that share a protected characteristic? If so, how will you address this?

Please read the corporate public consultation guidelines before you begin:  
<http://intranet.croydon.net/finance/customerservices/customerserviceprogramme/stepbystepguide.asp>.

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**2.4** If you really cannot gather any useful information in time, then note its absence as a potential disadvantageous impact and describe the action you will take to gather it.

Please complete the table below to set out how will you gather the missing evidence and make an informed decision. Insert new rows as required.

Group's with a "Protected characteristic" and broader community issues	Missing information and description of potential disadvantageous impact	Proposed action to gather information

A criticism levelled at the Temporary LTN is that it has caused a worsening of air quality experienced disproportionately by members of the BAME groups	There is no hard/clear evidence with which to support or counteract this criticism	The monitoring of the Experimental LTN should be designed to seek to try and answer this question or at least provide a deeper and clearer insight
Transport for All has levelled a general criticism at the LTNs implemented across London re engagement with disabled people	Transport for All is suggesting that not enough is known about the effects and potential effects on people with disabilities	Transport for All and members of the Croydon Mobility Forum to be engaged with in the development of the engagement and monitoring strategies for the Experimental LTN.
The residents and business consultations on the future for the Temporary LTN failed to reach children and many young people.	Lack of knowledge regarding the experiences of children and young people	The engagement strategy and monitoring strategy for the proposed Experimental LTN should be designed to reach and include children and young people.

### Stage 3 Improvement plan

#### Actions to address any potential disadvantageous impact related to the proposed change

This stage focuses on describing in more detail the likely disadvantageous impact of the proposed change for specific groups that may share a protected characteristic and how you intend to address the probable risks that you have identified stages 1 and 2.

**3.1 Please use the section below to define the steps you will take to minimise or mitigate any likely adverse impact of the proposed change on specific groups that may share a protected characteristic.**

Equality Group (Protected Characteristic)	Potential disadvantage or negative impact e	Action required to address issue or minimise adverse impact	Action Owner	Date for completing action
Disability Since this preparation of this	Inaccessible street Environment	Transport for All lists the factors hindering disabled people engaging in active travel, the second of which is the condition of physical	Head of Highways and The Council's	When the lessening of the Pandemic and related

<p>Equality Analysis in December 2020, Transport for All has published its report 'Pave the Way' based people with disabilities' experiences of LTNs. The opportunity has been taken to update this Analysis</p>		<p>infrastructure, such as uneven footways. Whilst the proposed experimental LTN is not expected to worsen the condition of footways etc, LTNs are perhaps opportune times and locations to make improvement to seek to maximise the opportunity for people with disabilities to engage in active travel. A street access audit should be undertaken to identify potential improvements such as footway repairs, installing dropped kerbs and reducing street clutter. The audit should be undertaken with members of the Mobility Forum when/as the lessening of the Pandemic allows.</p> <p>Resting spaces should be provided by placing temporary 'Parklets' incorporating seating at a few locations in Auckland Road and their use monitored</p>	<p>Access Officer</p>	<p>restrictions allow</p>
	<p>Participation in consultation</p>	<p>Transport for All has raised concerns around the nature of consultation that has been undertaken in relation to LTNs across London. Further engagement and focussed research would be undertaken as part of /during the proposed Experimental LTN. The engagement strategy and monitoring strategy should be developed with the involvement of Transport for All and members of the Croydon Mobility Forum.</p>	<p>Head of Transport</p>	<p>Before the operation of the Experimental LTN</p>
	<p>Journey Times for Taxis and Dial-a-Ride</p>	<p>Transport for All report that 15% of those participating in its research reported LTNs impacting on their ability to use taxis. It is not clear from the report whether 'taxis' includes Private Hire Vehicles / minicabs. The Taxicard</p>	<p>Head of Highways</p>	<p>Before the operation of the Experimental LTN</p>



		<p>scheme uses minicabs as well as Taxis. TfL's research shows that people with disabilities make more journeys by minicab than taxis. However exempting buses and taxis from the proposed camera enforced 'No Motor Vehicle' would enable the same exemption to be applied to taxis and dial-a-ride vehicles etc as proposed at the Auckland Road bus gate.</p> <p>Transport for All report concerns about the increased journey time for people giving care. This is something also highlighted by the consultation into the future for the Temporary LTN and relayed at TMAC. Exemptions to the restrictions implementing the proposed experimental LTN should be provided for those giving care to residents within the LTN</p> <p>There is not a ready solution to the issue of potentially longer journeys by disabled people using minicabs. The Transport for All proposed scheme that would grant dispensation for disabled people requiring access to their home by any vehicle they choose, could be the solution but it is suggested that this needs to be developed across London with TfL perhaps facilitated by London Council's</p> <p>Half the participants in the Transport for All research had a blue badge parking permit. Access to the proposed Blue Badge parking bays serving the Auckland Surgery could be further improved by allowing blue badge permit holders to</p>	<p>Head of Transport</p> <p>The Council's Access Officer,</p> <p>TfL and potentially London Council's</p> <p>Head of Highways</p>	<p>As soon as possible if achievable. Dialogue to start with TfL, London Councils and Transport for All in March 2021.</p> <p>Before the operation of the Experimental LTN</p>
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		apply for an exemption permit similar to the scheme where blue badge holders are able to apply for a 100% discount for the Congestion Charge for up to two vehicles they register with TfL.		
Age				
Gender				
BME				

**3.2 How will you ensure that the above actions are integrated into relevant annual department or team service plans and the improvements are monitored?**

They will be reported on when reporting the results of and review of the Experimental LTN

**3.3 How will you share information on the findings of the equality analysis with customers, staff and other stakeholders?**

The results will be published as part of reporting to the Traffic Management Advisory Committee (TMAC) including when reporting the results of and review of the Experimental LTN and making any decision on the future of the Experimental LTN.

**Section 4 Decision on the proposed change**

**4.1 Based on the information in sections 1-3 of the equality analysis, what decision are you going to take?**

Decision	Definition	Yes / No
<b>We will not make any major amendments to the proposed change because it already includes all appropriate actions.</b>	Our assessment shows that there is no potential for discrimination, harassment or victimisation and that our proposed change already includes all appropriate actions to advance equality and foster good relations between groups.	No
<b>We will adjust the proposed change.</b>	We have identified opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the proposed change. We are going to take action to make sure these opportunities are realised.	Yes
<b>We will continue with the proposed change as planned because it will be within the law.</b>	We have identified opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the proposed change.	No

	However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned.	
<b>We will stop the proposed change.</b>	The proposed change would have adverse effects on one or more protected groups that are not justified and cannot be lessened. It would lead to unlawful discrimination and must not go ahead.	No

<b>4.2</b>	<b>Does this equality analysis have to be considered at a scheduled meeting?</b> If so, please give the name and date of the meeting.
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TMAC 15<sup>th</sup> February 2021

<b>4.3</b>	<b>When and where will this equality analysis be published?</b>  An equality analysis should be published alongside the policy or decision it is part of. As well as this, the equality assessment could be made available externally at various points of delivering the change. This will often mean publishing your equality analysis before the change is finalised, thereby enabling people to engage with you on your findings.
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It will be published as an appendix to the report to TMAC on 15<sup>th</sup> February 2021

<b>4.4</b>	<b>When will you update this equality analysis?</b>  Please state at what stage of your proposed change you will do this and when you expect this update to take place. If you are not planning to update this analysis, say why not
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The Analysis will be updated in stages when the access audit has been undertaken, when dialogue has happened with Transport for All and the Croydon Mobility Forum members and when the research into and monitoring of effects of the Experimental LTN is concluding and recommendations on the future for the Experimental LTN is being prepared.

<b>4.5</b>	<b>Please seek formal sign of the decision from Director for this equality analysis?</b> This confirms that the information in sections 1-4 of the equality analysis is accurate, Comprehensive and up-to-date.
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<b>Officers that must approve this decision</b>	<b>Name and position</b>	<b>Date</b>
<b>Head of Service / Lead on equality analysis</b>	Ian Plowright, Head of Transport	02/02/2021
<b>Director</b>	Steve Iles, Director of Public Realm	05/02/2021

**Email this completed form to [equalityandinclusion@croydon.gov.uk](mailto:equalityandinclusion@croydon.gov.uk), together with an email trail showing that the director is satisfied with it.**

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