

Equalities Analysis Assessment

1. Proposal Summary Information

EAA Title	School Streets
Please describe your proposal?	Implementation of 3 permanent School Streets enforced by Automatic Number Plate Recognition (ANPR) cameras
Is it HR Related?	No
Corporate Purpose	Officer decision

1. What is the Scheme looking to achieve? Who will be affected?

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

School Streets are usually implemented to encourage walking, scooting or cycling, improve air quality and reduce road danger outside of schools.

From 2022 School Streets are prioritised according to selection criteria that includes the following categories:

- Road safety (casualties)
- Air Quality
- Index of Multiple Deprivation
- STARS engagement
- Active travel
- Location suitability

Schools chosen to participate in these schemes have already tried other means of improving the road environment around the school gates. They will have tried publicity, training and promotion activities to improve the situation, often with limited success. Schools will support their scheme by continuing to promote active travel and raising awareness of road safety for the school journey, through the TfL STARS programme.

Signs at the entrances to the scheme will inform drivers of the restrictions. The owners of non-registered vehicles will receive a penalty charge notice if they enter the scheme during the times of operation.

The School Street will be enforced by Automatic Number Plate Recognition (ANPR) cameras for the duration of the agreed times.

Dispensation is given for vehicles registered at residence and businesses within the zone; blue badge holders employed by businesses within the zone; school staff and parent blue badge holders that require access to the school; and all emergency service vehicles. Other vehicles, including parents/carers of school children, visitors and deliveries, are not permitted to access the School Street.

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The schemes are funded from the Council's Capital Growth budget.

2. What will the impact of your proposal be?

The school run makes up over a quarter of London's morning traffic. In Ealing 84% of primary pupils live up to 1 mile from school but only 69% travel actively to school. The proportion of car journeys (totalling 23% in 2017/18, down from 25% in 2016/17) is higher than the number of pupils living over 1 mile from school, suggesting that a number of these car journeys are short (less than one mile) and therefore walkable or cycle-able.

There is a significant increase in traffic and congestion at the start and end of the school day.

The overall benefits of Schools Streets are:

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

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

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

The Ealing School Streets programme has been in place since September 2020. 17 schools have been supported with School Streets. These schemes have been successfully implemented in many Local Authorities in London and nationally, including industry leaders Hackney, Camden, Birmingham, Solihull and Edinburgh, using various types of enforcement. The result is a reduction in traffic around the school gates and more children walking, cycling or taking public transport to their school, instead of being dropped off by car, at the school gate.

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

Residents in surrounding streets may be concerned that there will be increased congestion for them. We will be working with school communities to identify and promote locations away from schools where parents can park; this should disperse the cars over a wider area than at present. Our experience and that of other London Boroughs shows that residents in surrounding roads are not adversely affected as parking by families who choose or need to drive will be dispersed over a much wider area. Additionally, the school will be promoting and encouraging active travel to reduce car use for the school journey.

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The research report by Edinburgh Napier University finds School Street related traffic displacement doesn't cause road safety issues in neighbouring streets <https://www.napier.ac.uk/about-us/news/school-street-closures>

In March 2021 the GLA published a study that investigated the air quality benefits of new School Streets, installed as part of the Mayor's London Streetspace Programme, in response to the coronavirus pandemic. It demonstrated that School Streets can play a role in reducing peak exposure to pollution concentrations outside of schools.

https://www.london.gov.uk/sites/default/files/school_streets_monitoring_study_march21.pdf

Qualitative research on School Streets, undertaken by TfL in 2022, found they are seen as a positive step towards safer, calmer and more healthy local areas, with benefits such as a growing sense of neighbourhood. [School Streets qualitative research 2022 \(tfl.gov.uk\)](https://www.tfl.gov.uk/research-and-data/school-streets-qualitative-research-2022)

2. Impact on Groups having a Protected Characteristic

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

Positive and negative impact

Describe the Impact

CONSTRUCTION

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

OPERATION (implementation)

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

There is **slight impact** on others that are wholly or mostly dependent on vehicular travel as their taxis and other vehicles are not eligible for permits and these vehicles will need to arrive outside of operational times. However they can take alternative routes during operational times.

No buses are routed through any of the School Streets.

The impact on older pedestrians and school children and their families is expected to be **positive**. Road safety in the residential area is expected to be improved with lower traffic volumes supporting more walking and cycling in the area.

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

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

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

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

Describe the Mitigating Action

Residents and businesses within the scheme can apply for free permits for vehicles registered at their properties. Residents can apply for additional permits for carers that have official notification of their duties. Their visitors are not permitted to enter the zone and will be asked to arrive outside of the closure times.

Blue badge holders that require access to the school or a business within the School Street during operational times are eligible to apply for free permits to access the area at all times.

DISABILITY: *A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day to day activities¹.*

Positive, negative and neutral impacts

Describe the Impact

CONSTRUCTION

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

OPERATION

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

If a particular person is wholly or mostly dependent on vehicular travel provided by others (e.g. a person with a significant mobility impairment or wheelchair users requiring taxis), the operation of the finished scheme will have **slight negative impact** as these vehicles are not eligible for permits and will need to arrive outside of operational times. However they can take alternative routes during operational times.

Blue badge holders who are resident or work in the area can register with the Council to allow them access to the closure during operational times. It is also proposed that any blue badge holders dropping off and collecting staff and pupils should also be exempt subject to them also applying to

¹ Due regard to meeting the needs of people with disabilities involves taking steps to take account of their disabilities and may involve making reasonable adjustments and prioritizing certain groups of disabled people on the basis that they are particularly affected by the proposal.

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register for dispensation. Officers will advise the school of the application process in order to support these registrations.

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

Approved providers of Special Needs Transport are eligible to apply for free permits to enter the zone to undertake services of a local authority in pursuance of its statutory powers or duties.

Operation of the proposed scheme will have **no additional impact** on staff and parent blue badge holders and providers of Special Needs Transport as they can apply for an exemption.

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

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

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

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

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

Describe the Mitigating Action

Disabled residents and business employees within the scheme can apply for free permits for vehicles registered at their property. Residents can apply for additional permits for carers that have official notification of their duties. Their other visitors are not permitted to drive into the zone and will be asked to arrive outside of the closure times or park in alternative streets. Parents or carers of a child with a blue badge will be granted a dispensation and are eligible to apply for a free permit.

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

Impacts will be closely monitored and any on-going adverse impacts will be considered, as appropriate.

Officers will write to all residents in the local area to make them aware of the proposal in advance so that alternative arrangements (e.g. new routes) are known.

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GENDER REASSIGNMENT: <i>This is the process of transitioning from one sex to another. This includes persons who consider themselves to be trans, transgender and transsexual.</i>
Neutral impact
Describe the Impact
There is no clear evidence, data or rationale to expect that these works will have a differential impact on people with this characteristic.
Alternatives and mitigating actions which have been considered in order to reduce negative effect:
Describe the Mitigating Action
Not applicable.

RACE: <i>A group of people defined by their colour, nationality (including citizenship), ethnic or national origins or race.</i>
Neutral Impact
Describe the Impact
There is no clear evidence, data or rationale to expect that these works will have a differential impact on people with this characteristic.
Alternatives and mitigating actions which have been considered in order to reduce negative effect:
Describe the Mitigating Action
Not applicable.

RELIGION & BELIEF: <i>Religion means any religion. Belief includes religious and philosophical beliefs including lack of belief (for example, Atheism). Generally, a belief should affect a person's life choices or the way you live for it to be included.</i>
Neutral impact
Describe the Impact
If an attendee of a religious building is wholly or mostly dependent on car or vehicular travel (e.g. a person with a significant mobility impairment or wheelchair users), the operation of the School Street may generate a slight negative impact initially. However, this is not specific to any religious belief so is covered more fully in the disability section of this EEA.
Alternatives and mitigating actions which have been considered in order to reduce negative effect:
Describe the Mitigating Action
All staff and visitors to the building are not permitted to enter the zone and will be asked to arrive outside of the closure times.

SEX: <i>Someone being a man or a woman.</i>
Neutral impact
Describe the Impact
Women are more likely to do most of the work involved in looking after children and other family members. Data from Office of National Statistics suggests that mothers in two-parent households were

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providing two-thirds more childcare than men during COVID-19 lockdowns [81854](#)
(peoplemanagement.co.uk)

According to the [2014 National Travel Survey](#), trips to escort children to school are more likely to be made by women aged 30 to 49. This trend has continued as shown in The [National Travel Survey 2021: Trips by purpose, age and sex - GOV.UK \(www.gov.uk\)](#). 8% of all trips made by females and 4% made by males in 2021 are for escort education.

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

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

Describe the Mitigating Action

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

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

Neutral impact

Describe the Impact

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

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

Describe the Mitigating Action

Not applicable.

PREGNANCY & MATERNITY: *Description: Pregnancy: Being pregnant. Maternity: The period after giving birth - linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, including as a result of breastfeeding.*

Neutral impact

Describe the Impact

This group may have greater reliance on motorised vehicles during the period of pregnancy or maternity. However the scheme does not discriminate against this group.

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

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Alternatives and mitigating actions which have been considered in order to reduce negative effect:
Describe the Mitigating Action
Impacts will be closely monitored and any on-going adverse impacts will be taken into account as appropriate. If required a temporary permit can be requested, supported by confirmation from a medical practitioner.

MARRIAGE & CIVIL PARTNERSHIP: <i>Marriage: A union between a man and a woman. or of the same sex, which is legally recognised in the UK as a marriage</i> <i>Civil partnership: Civil partners must be treated the same as married couples on a range of legal matters.</i>
Neutral impact
Describe the Impact
There is no clear evidence, data or rationale to expect that these works will have a differential impact on people with this characteristic.
Alternatives and mitigating actions which have been considered in order to reduce negative effect:
Describe the Mitigating Action
Not applicable.

3. Human Rights²
4a. Does your proposal impact on Human Rights as defined by the Human Rights Act 1998? Articles 1 and Article 8 of the Protocol to the European Convention of Human Rights (which are enshrined in the 1998 Act) confirm as follows Article 1 "Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and the general principles of international law. The preceding provisions shall not, however, in any way impair the right of the state to enforce such laws as it deems necessary to control the use of property in accordance with the general interest...." Article 8 "Everyone has the right to respect for his private and family life, his home and his correspondence. There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country. For the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others'. To the extent that Articles 1 and/or 8 applies it is considered that the decision to introduce experimental traffic orders to create School Streets is justified in the public interest given the anticipated positive outcomes outlined above.

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

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

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

4c. Does your proposal impact on the rights of persons with disabilities as defined by the UN Convention on the rights of persons with disabilities?

Yes, the proposed School Streets scheme has considered the accessibility issues for persons with disabilities to live independently. This includes the identification and elimination of obstacles and barriers to accessibility.

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

4. Conclusion

There are no significant negative impacts on any of the groups within the Protected Characteristics. It is anticipated that there will be positive impacts for children. Any negative impacts will be closely monitored and any on-going adverse impacts will be taken into account to identify appropriate mitigations, as has been outlined above in instances where the scheme's proposals will impact a persons health due to their age and/or disability, for example, notification of their eligibility for an exemption.

4a. What evidence, data sources and intelligence did you use to assess the potential impact/effect of your proposal? Please note the systems/processes you used to collect the data that has helped inform your proposal. Please list the file paths and/or relevant web links to the information you have described.

- Data available from Office of National Statistics - [Women shoulder the responsibility of 'unpaid work' - Office for National Statistics](#)
- Evidence from research of School Street installations - [School street closures could improve amount of walking, cycling and wheeling to school, study shows \(napier.ac.uk\)](#)
- Evidence from evaluation of School Streets
 - [School Streets: Intervention Sites vs. Control Sites Full Report \(tfl.gov.uk\)](#)
 - [School Streets qualitative research 2022 \(tfl.gov.uk\)](#)
- Air Quality Monitoring Study - [London School Streets](#)

5. Action Planning: (What are the next steps for the proposal please list i.e. when it comes into effect, when mitigating actions³ will take place, how you will measure impact etc.)

Action	Outcomes	Success Measures	Timescales/ Milestones	Lead Officer (Contact Details)

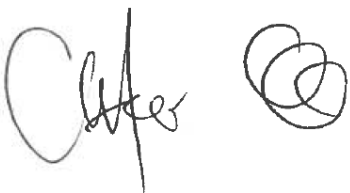

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Provide free permits to allow access for vehicles registered to residents, businesses and organisations within the scheme and others who are exempt	Exempt vehicles have access to the School Street at all times	<ul style="list-style-type: none"> • Letters sent to those eligible for permits, advising how to apply. • Permit applications made via online portal and queries raised via school street mailbox. 	From 1 month prior to the start and for the duration of the scheme	Transport Planning Service
Closure enforced by ANPR camera	Signage and camera in place to enforce access restriction	<ul style="list-style-type: none"> • Improvement in compliance of access restriction 	From start date and during operating times	Transport Planning Service
Active travel maps are provided, if available. And active travel is promoted by the schools	Families have information on walking routes and suitable Park & Stride locations. Schools are engaged in STARS programme	<ul style="list-style-type: none"> • PDF versions of the active travel map provided to share with families via their websites • Schools achieve or maintain STARS accreditation 	Maps provided during Autumn term STARS accreditation is approved in Summer term	Transport Planning Service
Set up and communicate a feedback mechanism	Stakeholders are aware of how to report issues that may impact them	<ul style="list-style-type: none"> • School Streets mailbox open and receiving emails 	Continual process	Transport Planning Service
Implement monitoring regime	Scope, obtain or survey items for monitoring (mode of travel data, traffic surveys.) Seek feedback from school community on implementation of the scheme	<ul style="list-style-type: none"> • Collection of data • Collection of feedback • Act upon feedback where reasonable and applicable 	All data to be collected one year after original collection date.	Transport Planning Service
Use of industry standards and guidelines in design	Minimise any negative impacts on any equalities group	<ul style="list-style-type: none"> • Undertake audit 	2 months after installation	Highways
Consider all impacts on those that identify within the protected characteristics definition equalities group	Avoid adding to/ removing elements which specifically and significantly negatively impact on any equalities group	<ul style="list-style-type: none"> • Undertake audit 	2 months after installation	Highways

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as part of the design				
Additional Comments: None.				

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

Completing Officer Sign Off:	Service Director Sign Off:	HR related proposal (Signed off by directorate HR officer)
<p>Signed:</p>  <p>Name (Block Capitals): CHRIS COLE</p> <p>Date: 26th June 2023</p>	<p>Signed:</p>  <p>Name (Block Capitals): DARREN HENAGHAN</p> <p>Date: 22nd June 2023</p>	<p>Signed:</p> <p>Name (Block Capitals): NOT APPLICABLE</p> <p>Date:</p>
<p>For EA's relating to Cabinet decisions: received by Committee Section for publication by (date)</p>		

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Appendix 1: Legal obligations under Section 149 of the Equality Act 2010:

- As a public authority we must have due regard to the need to:
 - a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

- The protected characteristics are: AGE, DISABILITY, GENDER REASSIGNMENT, RACE, RELIGION & BELIEF, SEX, SEXUAL ORIENTATION, PREGNANCY & MATERNITY, MARRIAGE & CIVIL PARTNERSHIP

- Having due regard to advancing equality of opportunity between those who share a protected characteristic and those who do not, involves considering the need to:
 - a) Remove or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
 - b) Take steps to meet the needs of persons who share a relevant characteristic that are different from the needs of the persons who do not share it.
 - c) Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

- Having due regard to fostering good relations between persons who share a relevant protected characteristic and persons who do not, involves showing that you are tackling prejudice and promoting understanding.

- Complying with the duties may involve treating some people more favourably than others; but this should not be taken as permitting conduct that would be otherwise prohibited under the Act.