

<b>REPORT TO:</b>	<b>TRAFFIC MANAGEMENT ADVISORY COMMITTEE</b> <b>12 January 2022</b>
<b>SUBJECT:</b>	<b>London Road Corridor – Cycle Safety Scheme</b>
<b>LEAD OFFICER:</b>	<b>Sarah Hayward, Corporate Director of Sustainable Communities, Regeneration &amp; Economic Recovery</b> <b>Steve Iles, Director of Sustainable Communities</b> <b>Heather Cheesbrough, Director of Planning and Sustainable Regeneration</b>
<b>CABINET MEMBER:</b>	<b>Councillor Muhammad Ali - Cabinet Member for Sustainable Croydon</b>
<b>WARDS:</b>	<b>West Thornton, Broad Green</b>

#### **SUMMARY OF REPORT:**

The report considers comments and objections received during consultation on Traffic Management Orders (TMOs) to introduce permanent cycle lanes and other changes to the London Road between Brigstock Road and Bensham lane. The recommended measures would make permanent the current temporary cycle lanes (plus associated temporary restrictions and measures) and bringing about further improvements, including pedestrian crossing facilities and public realm improvements.

#### **COUNCIL PRIORITIES 2020-2024**

The proposed scheme address several of the Council's priorities, namely:

- *We will live within our means, balance the books and provide value for money for our residents*

The implementation of the recommended proposals is supported by grant funding from TfL and the GLA. In order to maximise future grant funding, Croydon Council needs to act swiftly delivering the measures called for by central government and TfL to support Walking and Cycling.

- *We will focus on tackling ingrained inequality and poverty in the borough. We will follow the evidence to tackle the underlying causes of inequality and hardship, like structural racism, environmental injustice and economic injustice.*

The proposals help deliver the Mayor of London's Healthy Streets objectives, bringing benefits in terms of healthy weight, improved air quality, free/low cost travel, and meeting climate emergency objectives. These benefits expected to accrue more strongly to the most deprived communities in the borough.

- *We will focus on providing the best quality core service we can afford:*

The project is part of a wider programme focussed on providing safer street space in which people can choose to become more active, and in turn healthy, ultimately accruing savings to the NHS and Council care services.

### **FINANCIAL IMPACT:**

There is external funding and Growth Zone funding with which to implement the recommended scheme in 2022/23 as follows:

#### Summary of Current Funding:

Growth Zone 2021/22	£100,000.00
GLA Business Low Emission Neighbourhood	£325,000.00
Section 106	£16,347.12
TfL Local Implementation Plan Funding 2021/22	£10,000.00
TfL administered DfT Active Travel Funding 2021/22	£50,000.00
<b>TOTAL:</b>	<b>£501,347.12</b>

£675,000 of further funding is required for the next financial year and is subject to Cabinet approval of the Local Implementation Plan funding request to TfL and Growth Zone allocations. Construction work on the conversion of the existing temporary scheme will be phased to reflect the levels of funding available at each stage.

#### Summary of Proposed Funding:

Growth Zone 2022/23	£200,000.00
TfL LIP Funding 2022/23 (TBC)	£475,000.00
<b>TOTAL:</b>	<b>£675,000.00</b>

(All project spend is referred to Spending Control Panel for approval)

**KEY DECISION REFERENCE NO.:** This is not a key decision. (This scheme is part of Key Decision 3621CAB approved by Cabinet on 26 July 2021).

### **1. RECOMMENDATIONS**

That the Traffic Management Advisory Committee recommend to the Cabinet Member for Sustainable Croydon that they:

- 1.1 Consider the comments and objections received in response to Notice published in respect of making permanent the temporary mandatory cycle

lanes on London Road, and the implementation of associated permanent changes including pedestrian crossing facilities.

1.2 Consider the officer's response to the objections in Section 2 and Appendix C of this report.

1.3 Authorise the Highways Traffic Manager, Sustainable Communities Division to make the necessary Traffic Management Orders under the Road Traffic Regulation Act 1984 (as amended) the effect of which would be to introduce the following measures as part of making permanent the temporary cycle lanes in London Road (between Brigstock Road and Bensham Lane) to:

- (a) make permanent the existing temporary waiting and loading restrictions operating "at any time" in London Road between its junctions with Brigstock Road and Bensham Lane.
- (b) permanently remove all parking and loading bays from the above section of London Road.
- (c) provide short-term parking bays in side-streets as described at Section 2.5 ii of this report.
- (d) provide short-term loading bays in side streets as described at Section 2.5 iii of this report.
- (e) make permanent the existing temporary 20mph speed limit in London Road between its junctions with Brigstock Road and St James's Road.

1.4 Authorise the Head of Highways and Parking to exercise powers under the Highways 1980 to:

- (a) make permanent the existing temporary cycle lanes in London Road with permanent lightly segregated facilities and permanent sections of advisory cycle lanes on the carriageway between Brigstock Road and Bensham Lane.
- (b) install raised Zebra Crossings in London Road as described at Section 2.6 i of this report.
- (c) install raised side road entry treatments as described at Section 2.6 ii of this report.

The general effect of Recommendations 1.3 and 1.4 being to permanently install the measures in the scheme drawing at Appendix B, in that part of London Road Croydon Council is Highway Authority.

## 2. THE RECOMMENDED PERMANENT MEASURES

### Background

- 2.1 In May 2020, the Secretary of State for Transport issued Statutory Guidance on 'Network Management to Support Recovery from COVID-19'<sup>1</sup>. The Guidance has been updated several times but continues to call on local authorities to act swiftly to introduce measures to facilitate walking and cycling including:

*'installing cycle facilities with a minimum level of physical separation from volume traffic; for example, mandatory cycle lanes, using light segregation features such as flexible plastic wands; converting traffic lanes into cycle lanes (suspending parking bays where necessary); widening existing cycle lanes to enable cyclists to maintain distancing. Facilities should be segregated as far as possible, ie with physical measures separating cyclists and other traffic. Lanes indicated by road markings only are very unlikely to be sufficient to deliver the level of change needed, especially in the longer term'.*

Croydon Council responded, swiftly implementing measures including temporary cycle lanes and supporting changes under Temporary TMOs on a section of London Road, as well as measures elsewhere in the borough. Temporary TMOs operate for a period of up to 18 months. This report makes recommendation regarding the future of the temporary scheme, recommending making the cycle lanes permanent with associated changes, including improving pedestrian crossing facilities, as part of a wider programme to support Active Travel.

- 2.2 The report to 26 July 2021 Cabinet '2021/22 (Part) Local Implementation Plan Funding, Bus Priority Funding and Active Travel Funding Programme' (Agenda item 7<sup>2</sup>) recommended expenditure on, and implementation of a programme to deliver Croydon Local Implementation Plan objectives; Central Government's Sustainable and Active Travel objectives; and the Mayor of London's/TfL's Streetspace Plan objectives. The report explains that the programme is guided by The Mayor of London's Streetspace Plan, in particular its Appendix 4 'Analysis for Temporary Strategic Cycle Network'. TfL has identified Croydon as the borough with the greatest potential for cycling with over 400,000 trips made each weekday (in normal times) by motorised means (mostly by car) which could be readily cycled, if conditions and infrastructure allow. The recommended scheme is located on one of the corridors with the highest potential for cycling / a high priority strategic cycling corridor (Norbury –Croydon – Coulsdon) identified in TfL's Strategic Cycling Analyses. This project is a key part of the programme recommended to Cabinet.

---

<sup>1</sup> <https://www.gov.uk/government/publications/reallocating-road-space-in-response-to-covid-19-statutory-guidance-for-local-authorities/traffic-management-act-2004-network-management-in-response-to-covid-19>

<sup>2</sup> <https://democracy.croydon.gov.uk/ieListDocuments.aspx?CIId=183&MIId=2751>

### Detail

- 2.3 The Acting Corporate Director of Sustainable Communities, Regeneration & Economic Recovery (1 October 2021 (Ref TMDD 0109)) agreed to the publication of notices under the Road Traffic Regulation Act 1984 (as amended) (RTRA) and associated consultation, for TMOs necessary to implement measures which would make permanent the temporary changes implemented to assist cycling on London Road. Consultation on the intended permanent scheme<sup>3</sup> began 28 October and concluded on 18 November. 20 responses were received, 11 supporting the proposals and 9 objecting. Objections and officer responses are summarised below, with additional detail on consultation responses and proposed actions in Appendix C.

### MANDATORY CYCLE LANES

- 2.4 Notice was given of the intention to make permanent the existing temporary cycle lanes in London Road in order to improve cycling facilities to promote cycling / active travel. The existing temporary northbound and southbound cycle lanes between Brigstock Road and Bensham Lane would be upgraded as part of making them permanent. Signs and road markings would mark the start and finish of the cycle lanes. At certain points, the cycle lane will be omitted to accommodate bus stops, vehicular access into properties and across key junctions. At these points the carriageway will be marked with cycle logos advising motorists of the presence of cyclists. Objections to making the temporary cycle lanes permanent, were:
- Facilities will create road congestion
  - Facilities are unnecessary

The officers' responses to the objections are:

- London road was a single lane in each direction before the temporary scheme was implemented, and remains so. By relocating parking off the London Road and into side roads, the space available for general traffic is increased. The segregation of the cycle lanes has been amended to allow other vehicles to pull into the cycle lane to let emergency vehicles pass.
- These routes are based on TfL's most recent Strategic Cycling Analysis which informs the implementation of a coherent cycle network across London. Croydon is the borough with the greatest potential for cycling, with over 400,000 trips made each weekday (in normal times) by motorised means (mostly by car) which could be readily cycled, if conditions and infrastructure allow. This scheme is located on one of the corridors with the highest potential for cycling. As such, it is a key part of the wider programme intended to release Croydon's cycling potential.

---

<sup>3</sup> <https://www.croydon.gov.uk/parking-streets-and-transport/travel/public-healthy-streets/london-road-corridor>

PERMANENT INTRODUCTION OF SHORT-TERM PARKING & LOADING BAYS, 20MPH SPEED LIMIT & “AT ANY TIME” WAITING AND LOADING RESTRICTIONS TO FACILITATE A MANDATORY CYCLE LANE

2.5 Notice was given of the intention to make TMOs, the effect of which would be to:

i. make permanent the temporary 20mph speed limit associated with the temporary cycle lanes on London Road (between Brigstock Road and Bensham Lane) and the current temporary removal of parking and loading bays from this section of London Road.

ii. provide short-term parking bays in side-streets:

**Dunheved Road North** Two parking bays adjacent to the flank wall of No. 603 London Road (replacing one shared use permit/parking space).

**Stanley Road** Two parking bays either side of Stanley Road adjacent to the flank walls of Nos. 439 and 501 London Road.

**Midhurst Avenue** Two parking bays adjacent to the flank wall of Griffin House, London Road.

**Greenside Road** Two parking bays adjacent to the flank wall of Nos. 369 to 375 London Road immediately to the north-east of the relocated loading bay.

**Pemdevon Road** Three parking bays – one adjacent to the flank wall of No 331 London Road and two adjacent to the flank wall of No. 311 London Road.

as described in the Notice and schedule to it at Appendix A to this report.

iii. provide short-term loading places in side streets:

**Alma Place** One ten metre bay adjacent to the flank wall of Nos. 682 to 684 London Road.

**Dunheved Road North** One eight metre bay adjacent to the flank wall of No. 639 London Road.

**Greenside Road** Relocating the existing loading bay (adjacent to the flank wall of Nos. 369 to 375 London Road) to a location three metres to the south-west of its current position and extending its length to 12 metres.

as described in the Notice and schedule to it at Appendix A to this report.

Objections received were:

- Disruption to the servicing arrangements for businesses and community facilities.
- Loss of parking for residents.
- Loss of parking for business customers.

The officers' responses are:

- Additional parking and loading bays have been added in side streets where possible to assist business deliveries and customer collection. We will work with local businesses and community groups to assist with parking and loading issues, including looking at potential one way

working on Campbell Road and any further additional parking and loading facilities.

- Additional parking bays have been added to side streets where possible to assist residents. Parking provision is balanced with the need to provide safe cycle infrastructure along a priority cycle corridor, especially following statutory guidance to reallocate streetspace to Active Travel modes<sup>4</sup>.
- Additional parking and loading bays have been added on side roads where possible to assist businesses for deliveries and use for customer collection. In addition 'smart parking' technology is proposed to help motorists identify available parking spaces on London Road.

## RAISED ZEBRA CROSSINGS & RAISED TABLE ENTRY TREATMENTS

2.6 Notice was given of the proposal to install

i. raised zebra crossings on London Road at:

**Brigstock Road adjacent to the flank wall of No. 744**

**London Road** (replacing existing signal controlled crossing).

**Canterbury Road, adjacent to the flank wall of No 429**

**London Road.** (new crossing)

**London Road outside No. 6 Brigstock Parade.** (new crossing) **London Road, outside No. 658.** (new crossing)

**London Road, outside No. 603.** (new crossing)

**London Road, outside No. 439.** (replacing existing signalised crossing)

**London Road, at the common boundary of Nos. 403 and 405.** (new crossing)

**London Road outside Nos. 369 to 375** (replacing existing signalised crossing)

ii. raised side road entry treatments at

**Alma Place** at the junction with London Road

**Earlswood Road** at the junction with London Road

to improve crossing facilities, increasing safety and ease of movement for pedestrians. The general effect of the zig-zag markings associated with the zebra crossings would be to prohibit all vehicles from stopping on the markings, improving safety by aiding pedestrian visibility. Objections to the raised zebra crossings and entry treatments were:

- Facilities will create road congestion
- Road Safety concerns
- Facilities are unnecessary

Officers' responses to the objections are:

- Traffic modelling is being undertaken and the scheme subject to a network assurance process with TfL to ensure there is not an

---

<sup>4</sup> <https://www.gov.uk/government/publications/reallocating-road-space-in-response-to-covid-19-statutory-guidance-for-local-authorities/traffic-management-act-2004-network-management-in-response-to-covid-19>

unacceptable impact on this part of the Strategic Road Network. In addition, the crossing between the Hospital and the Mosque (where footfall is highest) would remain a signalised crossing.

- All measures are subject to a Road Safety Audit process.
- This part of London Road is within one of the highest percentiles of casualty harm rate in London. The proposed measures are in line with the suggested range of high priority interventions to reduce the dominance of traffic and to make walking safer, easier and more accessible to all.

### **3 CONSULTATION**

3.1 The term 'formal consultation' is used in this report as shorthand for various parallel processes conducted prior to the making of a TMO. It relates to:

- the consultation with bodies such as the Fire Brigade required by Section 6 of The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996;
- the publication of Notice of the proposals the TMO would give effect to, as required by Section 7 of the Procedure Regulations; and
- additional consultation activities the Council chooses to engage in at this stage of the TMO making process, depending on the nature of the proposals.

3.2 Formal consultation on the recommended measures included:

- Public Notices published in the Croydon Guardian and London Gazette. Although it is not required by the Procedure Regulations, notices were also fixed to lamp columns in the vicinity of the proposed scheme, and occupiers potentially directly affected by the proposals were written to.
- Bodies such as the Fire Brigade, the Cycling Council for Great Britain, The Pedestrian Association, Age UK, The Confederation of Passenger Transport and bus operators are consulted following Section 6 of the Procedure Regulations 1996.
- Additional bodies, and individuals were consulted. These were ward councillors, key community groups and any groups identified as part of Equality Analysis (This includes the Croydon Cycle Campaign, The Mobility Forum and Croydon Vision).

Once Notice is published, there are 21 days in which to comment or object. Relevant objections received are reported to the Traffic Management Advisory Committee with recommendation as to whether the scheme should be introduced as originally proposed, amended or not proceed. Objectors are informed of the decision.



## 4 REASONS FOR RECOMMENDATIONS

4.1 The reasons for the recommendation are to:

- make permanent measures implemented under time limited Temporary TMO;
- bring about further improvement for pedestrians; and
- deliver the measures outlined in Section 2 and Appendix B in the most efficient and cost effective way.

This in turn aiding delivery of central government's, the Mayor's and the Council's Active, Healthy, Safe and Sustainable Travel objectives.

## 5 OPTIONS CONSIDERED AND REJECTED

5.1 Various options have been considered. It has been concluded that the recommended measures are the optimum means of delivering the objectives of the project, whilst balancing the needs of various streetspace users and the matters within Section 122 of the RTRA. The options considered were:

- Option 1 -Do nothing. This would mean that the improvements to the cycle network needed to connect to central Croydon would not come forward. External funding opportunities would be lost and the statutory duty to implement the transport facilities needed to deliver the Mayor's Transport Strategy objectives, would be fulfilled. Central government has warned that the swift removal of measures implemented in response to the Secretary of State for Transport's Statutory Guidance, could result in the loss of future transport investment funding to the local authority.
- Option 2 -Reduced provision of active travel facilities. The option would lead to fragmented facilities that would not meet the required design standards of TfL or the DfT. External funding opportunities will be lost and we will not meet the statutory duty to implement the transport facilities needed to meet the Mayor's Transport Strategy objective.
- Option 3 –More radical transformation: This option includes more radical proposals either to widen road space or significantly restrict the private motor vehicle to create space for active travel modes. The former would require significant additional funding that is not available and the latter would be a level of change that would be difficult to manage.

## 6. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

### 6.1 Revenue and Capital consequences of report recommendations

	Current Year	Medium Term Financial Strategy – 3 year forecast		
	2021/22 £'000	2022/23 £'000	2023/24 £'000	2024/25

<b>Revenue Budget Available</b>				
Expenditure Income				
<b>Effect of decision from report</b>				
Expenditure Income				
<b>Remaining Budget</b>				
<b>Capital Budget available</b>	<b>£501</b>	<b>£675*</b>		
Expenditure Income	£501	£675		
<b>Effect of decision from report</b>				
Expenditure Income				
<b>Remaining Budget</b>	0	0		

\* Subject to Cabinet decision and to TfL Funding

## 6.2 The effect of the decision

6.2.1 The making of the TMOs and the implementation of the measures to give effect to them, plus implementation of associated measures, will incur expenditure as set out above. The recommended measures have been designed to be implemented in a phased approach to fit with available funding, if necessary. Implementation in 2022/23 is dependent on Cabinet approval of Growth Zone Transport investment funding, the 2022/23 LIP Funding request to TfL and TfL acceptance of that request. The current year funding will enable the core of the proposals to be implemented.

6.2.2 The scheme sits within the public highway and the maintenance responsibility remains with the Highways Service. The measures have been designed in line with the Council's Public Realm Design Guide to minimise the call on future maintenance revenue budgets by employing standard design details and a standard palette of materials. As this scheme is outside a town or district centres, and is not in a conservation area, the basic borough wide palette of

materials will be used. The highway layout would also be rationalised and de-cluttered where possible to reduce the number of items in the public realm requiring maintenance.

- 6.2.3 As part of detailed design, whole life costs are calculated in line with the Council's New Streets Procedure (2014). Values are applied over a thirty year calculation period. This is based upon a survey of councils that have adopted the County Surveyors Society Commuted Sums for Maintaining Infrastructure Assets (2009 edition).

### **6.3 Risks**

- 6.3.1 Spend and delivery in 2022/23 is dependent on grant funding from TfL and Growth Zone funding. The recommended scheme/TMO would make permanent the temporary cycle lanes implemented in London Road. If some or all of the funding requested from TfL / required from the Growth Zone for this project in 2022/23, were not forthcoming, then some of the existing cycle lane infrastructure would be retained rather than replaced. Retention of the existing temporary infrastructure is likely to bring a higher maintenance need and cost.

### **6.4 Options**

- 6.4.1 The options considered are set out in Section 5.

### **6.5 Future savings/efficiencies**

- 6.5.1 The walking and cycling programme does not generate any direct positive cash flow. The wider benefits of the programme (to employment, transport, and health, environment) have an estimated monetised value of £6.2m. The proposed financial outlay should be considered in the context of the external funding for the programme, and the wider non-cash benefits the programme will deliver.

Approved by: Gerry Glover, Interim Head of Finance Sustainable Communities.

## **7. LEGAL CONSIDERATIONS**

- 7.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that Sections 6, 45, 46, 47, 49, 124 and Part IV of Schedule 9 of the Road Traffic Regulation Act 1984 (RTRA) provides the Council with the power to implement the changes proposed in this report. This legislation gives a local authority the power to make Traffic Management Orders (TMO) to control parking by designating on-street parking places, charging for their use and imposing waiting and loading restrictions on vehicles of all or certain classes at all times or otherwise.

- 7.2 In making such Orders, the Council must follow the procedures set out at Schedule 9, Part III of the Road Traffic Regulation Act 1984 and detailed in the Local Authorities Traffic Orders (Procedure)(England and Wales) Regulations 1996 (the 1996 Regulations). The said Regulations, prescribe inter alia, specific publication, consultation and notification requirements that must be strictly observed. In this case the Statutory Notice has been published and this Report focuses on taking account of representations made during the consultation stage and any material objections received to the making of the Order. This is in order for these to be taken into account by the Decision Maker when deciding whether or not to make the Order.
- 7.3 By virtue of section 122 of the RTRA, the Council must exercise its powers under that Act so as to secure the expeditious, convenient and safe movement of vehicular and other traffic including pedestrians, and the provision of suitable and adequate parking facilities on and off the highway. These powers must be exercised so far as practicable having regard to the following matters:-
- The desirability of securing and maintaining reasonable access to premises.
  - The effect on the amenities of any locality affected including the regulation and restriction of heavy commercial traffic so as to preserve or improve amenity.
  - The national air quality strategy.
  - The importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles.
  - Any other matters appearing to the Council to be relevant.
- 7.4 The Council must have proper regard to the matters set out at s 122(1) and (2) and specifically document its analysis of all relevant section 122 considerations when reaching any decision.

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

## **8. HUMAN RESOURCES IMPACT**

- 8.1 There are no Human Resources impact in regards to this report. If any should arise these will be managed under the Council's policies and procedures.

Approved by: Jennifer Sankar, Head of HR Housing & Sustainable Communities, Regeneration and Economic Delivery, for and on behalf Dean Shoemith, Director of Human Resources.

## **9. EQUALITIES IMPACT**

9.1 A full Equality Impact Analysis has been completed prior to consultation and has been update following the scheme consultation. This has identified the following key potential effects of the scheme on protected groups:

- The potential for increased cycling and walking facilities to have positive health impact for all user groups through increased levels of active travel and improvements in air quality with fewer cars on the road.
- The measures that will be introduced as part of the recommended scheme will lead to potential reductions in road danger and improve the appearance of the street, thereby creating an improved street environment that a wider range of people can enjoy. Children, older people, pregnancy / maternity groups and disabled people particularly benefit from a calmer and safer, street environment.
- The impact on more vulnerable user groups of the design of cycling facilities, particularly in relation to older users and blind and partially sighted user groups. The appearance of the cycle segregator units will need to contrast with the surrounding roads, kerbs and footways
- The impact on faith groups, disabled, pregnancy and maternity and older groups on the loss of parking spaces on London road. This has been mitigated where possible by the relocation of parking spaces.

9.2 Care is now being taken with the detailed design to ensure that any potential impacts of the recommended scheme on the above users are either designed out or are mitigated, and these proposals will be developed in more detail with key groups affected.

Approved by: Denise McCausland Equality Programme Manager.

## **10. ENVIRONMENTAL IMPACT**

10.1 The walking and cycling programme delivers a number of environmental benefits. This is largely associated with the improving of air quality and reducing CO2 emissions by facilitating use of sustainable modes of transport.

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

11.1 Improvements in walking and cycling should have a positive impact on crime and disorder by increasing footfall, improving the quality of the environment and introducing measures such as improved lighting.

## **12. DATA PROTECTION IMPLICATIONS**

### **12.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

**NO**

### **12.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?**

**YES** - for the consultation exercise conducted to inform this report and recommendations.

Approved by: Ian Plowright, Head of Strategic Transport on behalf of the Director of Planning and Sustainable Regeneration.

---

**CONTACT OFFICER:** Tom Sweeney, Programme Manager, Strategic Transport.

#### **APPENDICES TO THIS REPORT:**

Appendix A – Published Notices

Appendix B – Plan of measures recommended for implementation

Appendix C – Consultation responses summary plus officer response

Appendix D – Equalities Analysis

#### **BACKGROUND DOCUMENTS – LOCAL GOVERNMENT ACT 1972**

The report to 26 July 2021 Cabinet '*2021/22 (Part) Local Implementation Plan Funding, Bus Priority Funding and Active Travel Funding Programme*' (Agenda item 7)

# PUBLIC NOTICE

CROYDON COUNCIL  
HIGHWAYS ACT, 1980 - SECTION 65  
PROPOSED MANDATORY CYCLE LANE  
LONDON ROAD, THORNTON HEATH & CROYDON

Croydon Council HEREBY GIVES NOTICE that to promote cycling and improve cycling facilities, it proposes to make permanent the existing temporary cycle lanes in London Road, using powers under the Highways Act 1980.

The northbound and southbound cycle lanes will be segregated facilities provided on the carriageway in London Road between Brigstock Road and Bensham Lane.

Signs and road markings will be used to mark the start and finish of the cycle lane. At certain points the cycle lane will be omitted to accommodate bus stops, vehicular access into properties and across key junctions. At these points the carriageway will be marked with cycle logos advising motorists of the presence of cyclists.

A plan showing the proposals can be inspected from 9am and 4pm on Mondays to Fridays inclusive, at the Enquiry Counter, 'Access Croydon' Facility, Bernard Weatherill House, 8 Mint Walk, Croydon, CR0 1EA.

Further information may be obtained by telephoning Strategic Transport Team, Place Department on 020 8726 6000 Extension 62575.

Dated 28 October 2021  
Hilary Dickson  
Highways Traffic Manager  
Place Department

# PUBLIC NOTICE

## CROYDON COUNCIL

### PROPOSED PERMANENT INTRODUCTION OF SHORT-TERM PARKING & LOADING BAYS, 20MPH SPEED LIMIT & “AT ANY TIME” WAITING AND LOADING RESTRICTIONS TO FACILITATE A MANDATORY CYCLE LANE - LONDON ROAD AND SIDE ROADS, THORNTON HEATH & CROYDON

The Croydon (Prohibition and Restriction of Stopping, Loading and Waiting) and (Free Parking Places) (No. V34) Order 20-

The Croydon (On-Street Charged-For Parking Places) (No.V35) Order 20-

The Croydon (Speed Limit) (No. V36) Order 20-

1. NOTICE IS HEREBY GIVEN that Croydon Council proposes to make the above Traffic Orders under the relevant sections of the Road Traffic Regulation Act 1984 as amended and all other enabling powers.
2. **The general effect of the Orders would be to introduce the following measures to make permanent the temporary mandatory cycle lane in London Road (between Brigstock Road and Bensham Lane) :-**
  - (a) To make permanent the existing temporary waiting and loading restrictions operating “at any time” in London Road between its junctions with Brigstock Road and Bensham Lane;
  - (b) To permanently remove all parking and loading bays from the above section of London Road;
  - (c) To provide short-term parking and loading places in the side streets as described in the Schedules to this Notice.
  - (d) To make permanent the existing temporary 20mph speed limit in London Road between its junctions with Brigstock Road and St James’s Road;
  - (e) To amend the map-based tiles to the Schedule attached to the above Orders so as to accurately represent the new arrangements as they exist on site.
3. A copy of the proposed Orders and all related documents can be inspected until the last day of a period of six weeks beginning with the date on which the Orders are made or, as the case may be, the Council decides not to make the Orders, by email request to [Parking.Design@croydon.gov.uk](mailto:Parking.Design@croydon.gov.uk). Further information may also be obtained from the Parking Design team via email.
4. Persons desiring to object or make representations in relation to the proposed Orders should send a statement in writing of their objection and the grounds thereof to the Order Making Section, Parking Design Team, Place Department, Croydon Council, Floor 6, Zone C, Bernard Weatherill House, 8 Mint Walk, Croydon CR0 1EA or email [Parking.Design@croydon.gov.uk](mailto:Parking.Design@croydon.gov.uk) quoting the reference PD/CH/V34, V35 & V36 by 18 November 2021.
5. The proposed Orders are intended to introduce measures to facilitate a mandatory cycle lane in London Road (between Brigstock Road and Bensham Lane)

Dated 28 October 2021

Hilary Dickson,  
Highways Traffic Manager  
Place Department



# PUBLIC NOTICE

## SCHEDULE 1 - PROPOSED LOADING BAYS (LOADING ONLY "AT ANY TIME")

Street Name	Location of Loading Bay
Alma Place	One ten metre bay adjacent to the flank wall of Nos. 682 to 684 London Road.
Dunheved Road North	One eight metre bay adjacent to the flank wall of No. 639 London Road.
Greenside Road	Relocating the existing loading bay (adjacent to the flank wall of Nos. 369 to 375 London Road) to a location three metres to the south-west of its current position and extending its length to 12 metres.

## SCHEDULE 2 - PROPOSED SHORT-TERM PARKING BAYS (TWO-HOUR MAX STAY FIRST 30 MINS FREE, OPERATING 9AM-5PM, MON-SAT)

Street Name	Location of Parking Bays
Dunheved Road North	Two parking bays adjacent to the flank wall of No. 603 London Road (replacing one shared use permit/parking space).
Stanley Road	Two parking bays either side of Stanley Road adjacent to the flank walls of Nos. 439 and 501 London Road.
Midhurst Avenue	Two parking bays adjacent to the flank wall of Griffin House, London Road.
Greenside Road	Two parking bays adjacent to the flank wall of Nos. 369 to 375 London Road immediately to the north-east of the relocated loading bay.
Pemdevon Road	Three parking bays – one adjacent to the flank wall of No 331 London Road and two adjacent to the flank wall of No. 311 London Road.

## SCHEDULE 3 - PROPOSED SHORT-TERM PARKING BAYS TARIFF

Operational Hours	Stay	Charge
Mon – Sat 9am - 5pm	30min	£0.00
	1hr	£2.60
	1hr 30min	£3.90
	2hrs	£5.20
Sunday	All day	£0.00

# PUBLIC NOTICE

CROYDON COUNCIL  
ROAD TRAFFIC REGULATION ACT, 1984

SECTION 23 AND HIGHWAYS ACT 1980, SECTION 90C

PROPOSED RAISED ZEBRA CROSSINGS & ENTRY TREATMENTS

LONDON ROAD & SIDE ROADS, THORNTON HEATH & CROYDON

Croydon Council HEREBY GIVES NOTICE that they propose to install raised zebra crossings and entry treatments as specified in the Schedule to this Notice to provide safe crossing facilities and improve road safety for pedestrians.

The general effect of the zig-zag markings would be to prohibit all vehicles from stopping on the markings for any reason and to improve road safety by aiding pedestrians to cross safely.

Persons desiring to object to the proposal should send a statement in writing of their objections and grounds thereof to the Order Making Section, Parking Services, Parking Design Team, 6<sup>th</sup> Floor Zone C, Bernard Weatherill House, 8 Mint Walk, Croydon, CR0 1EA or by emailing [parking.design@croydon.gov.uk](mailto:parking.design@croydon.gov.uk) quoting the reference PD/CH/V35a by 18 November 2021.

Further information may be obtained by telephoning the Strategic Transport Team, Place Department on 020 8726 6000 Extension 62575.

Dated this 28 October 2021  
Hilary Dickson  
Highways Traffic Manager  
Place Department

# PUBLIC NOTICE

## Schedule

It is intended to place raised zebra crossings and entry treatments in the carriageway in accordance with the Highways (Road Humps) Regulations 1999. As a guide these will be between 75mm and 90mm high with an approximate ramp gradient of 1:15 and placed in the following approximate locations.

## Proposed Entry Treatments

- Alma Place at the junction with London Road
- Earlswood Road at the junction with London Road

## Proposed Raised Zebra Crossings

**Brigstock Road adjacent to the flank wall of No. 744 London Road.** The zig-zag markings would extend 17 metres to the north-east of the crossing point and to the junction with London Road to the south-west of the crossing point.

**Canterbury Road, adjacent to the flank wall of No 429 London Road.** The zig-zag markings would extend to the junction with London Road to the north-east of the crossing point and 17 metres to the south-west of the crossing point.

**London Road outside No. 6 Brigstock Parade.** The zig-zag markings would extend to the junction with Brigstock Road to the north-west of the crossing point and 17 metres to the south-east of the crossing point (stopping 6 metres short of the bus stop on the north-east side).

**London Road, outside No. 658.** The zig-zag markings would extend 17 metres either side of the crossing point.

**London Road, outside No. 603.** The zig-zag markings would extend 17 metres either side of the crossing point.

**London Road, at the common boundary of the Croydon Mosque and Islamic Centre and No. 519 London Road.** The zig-zag markings would extend 17 metres either side of the crossing point.

**London Road, outside No. 439.** The zig-zag markings would extend 17 metres either side of the crossing point.

**London Road, at the common boundary of Nos. 403 and 405.** The zig-zag markings would extend 17 metres either side of the crossing point on the north-east side of the road and 12 metres either side of the crossing point on south-west side of the road.

**London Road outside Nos. 369 to 375.** The zig-zag markings would extend 17 metres either side of the crossing point.

# PUBLIC NOTICE

CROYDON COUNCIL  
ROAD TRAFFIC REGULATION ACT, 1984

SECTION 23 AND HIGHWAYS ACT 1980, SECTION 90C

PROPOSED RAISED ZEBRA CROSSINGS & ENTRY TREATMENTS

LONDON ROAD & SIDE ROADS, THORNTON HEATH & CROYDON

Croydon Council HEREBY GIVES NOTICE that they propose to install raised zebra crossings and entry treatments as specified in the Schedule to this Notice to provide safe crossing facilities and improve road safety for pedestrians.

The general effect of the zig-zag markings would be to prohibit all vehicles from stopping on the markings for any reason and to improve road safety by aiding pedestrians to cross safely.

Persons desiring to object to the proposal should send a statement in writing of their objections and grounds thereof to the Order Making Section, Parking Services, Parking Design Team, 6<sup>th</sup> Floor Zone C, Bernard Weatherill House, 8 Mint Walk, Croydon, CR0 1EA or by emailing [parking.design@croydon.gov.uk](mailto:parking.design@croydon.gov.uk) quoting the reference PD/CH/V35a by 18 November 2021.

Further information may be obtained by telephoning the Strategic Transport Team, Place Department on 020 8726 6000 Extension 62575.

Dated this 28 October 2021  
Hilary Dickson  
Highways Traffic Manager  
Place Department

# PUBLIC NOTICE

## Schedule

It is intended to place raised zebra crossings and entry treatments in the carriageway in accordance with the Highways (Road Humps) Regulations 1999. As a guide these will be between 75mm and 90mm high with an approximate ramp gradient of 1:15 and placed in the following approximate locations.

### Proposed Entry Treatments

- Alma Place at the junction with London Road
- Earlswood Road at the junction with London Road

### Proposed Raised Zebra Crossings

**Brigstock Road adjacent to the flank wall of No. 744 London Road.** The zig-zag markings would extend 17 metres to the north-east of the crossing point and to the junction with London Road to the south-west of the crossing point.

**Canterbury Road, adjacent to the flank wall of No 429 London Road.** The zig-zag markings would extend to the junction with London Road to the north-east of the crossing point and 17 metres to the south-west of the crossing point.

**London Road outside No. 6 Brigstock Parade.** The zig-zag markings would extend to the junction with Brigstock Road to the north-west of the crossing point and 17 metres to the south-east of the crossing point (stopping 6 metres short of the bus stop on the north-east side).

**London Road, outside No. 658.** The zig-zag markings would extend 17 metres either side of the crossing point.

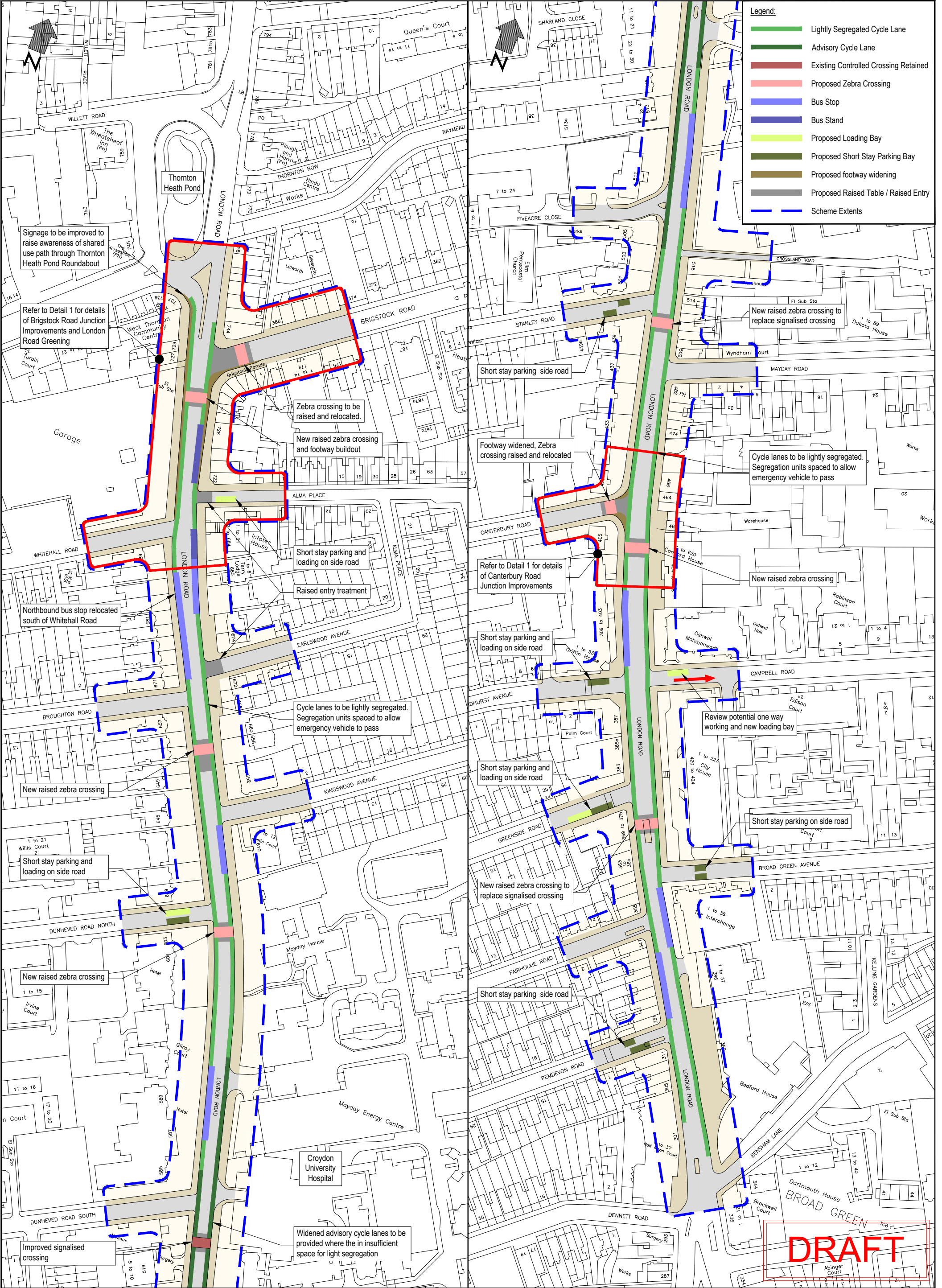
**London Road, outside No. 603.** The zig-zag markings would extend 17 metres either side of the crossing point.

**London Road, at the common boundary of the Croydon Mosque and Islamic Centre and No. 519 London Road.** The zig-zag markings would extend 17 metres either side of the crossing point.

**London Road, outside No. 439.** The zig-zag markings would extend 17 metres either side of the crossing point.

**London Road, at the common boundary of Nos. 403 and 405.** The zig-zag markings would extend 17 metres either side of the crossing point on the north-east side of the road and 12 metres either side of the crossing point on south-west side of the road.

**London Road outside Nos. 369 to 375.** The zig-zag markings would extend 17 metres either side of the crossing point.



## Appendix A –Consultation Responses Summary

Objection Theme	Summary of Issues Raised	Officer Response
<b>PROPOSED MANDATORY CYCLE LANES</b>		
Facilities will create road congestion	The cycle lanes have restricted traffic to a single lane in each direction and caused delays to public transport, buses, ambulances, cars and other vehicles	London road was a single lane in both directions before the temporary scheme was implemented and remains so. By relocating parking off the main road and onto side roads we have increased the space available for general traffic. The segregation of the cycle lanes has also been amended to allow other vehicles to pull into the cycle lane to let emergency vehicles past.
Facilities are unnecessary	There are not enough cyclists to justify facilities.	These routes are based on Transport for London’s most recent Strategic Cycling Analysis to plan a coherent cycle network across London. Croydon as the borough with the greatest potential for cycling with over 400,000 trips made each weekday (in normal times) by motorised means (mostly by car) which could be readily cycled, if conditions and infrastructure allow. This scheme is located on one of the corridors with the highest potential for cycling / a high priority strategic cycling corridor to be improved (Norbury –Croydon – Coulsdon). By providing safe cycling facilities on these strategic routes we are maximising the chances for people switching these trips.
<b>PROPOSED PERMANENT INTRODUCTION OF SHORT-TERM PARKING &amp; LOADING BAYS, 20MPH SPEED LIMIT &amp; “AT ANY TIME” WAITING AND LOADING RESTRICTIONS TO FACILITATE A MANDATORY CYCLE LANE</b>		
Disruption to the servicing arrangements for businesses and community facilities	Impact on the church located at the junction of London Road with Campbell Road, particularly for funerals.	Additional parking and loading bays have been added on side roads where possible to assist businesses for deliveries and use for customer collection. We will work with all local businesses and community groups to assist with parking and loading issues, including looking at potential one way working on Campbell Road and any further additional parking and loading facilities.
Loss of parking for residents	Removal of on-street parking spaces makes it more difficult for residents to park. It is requested that on street parking should be increased to include the block Earlswood Avenue to Kingswood Avenue in the east side of London Road.	Additional parking bays have been added to side roads where possible to assist residents. Parking provision has to be balanced with the need to provide safe cycle infrastructure along a key route in Croydon in line with government requirements to reallocate roadspace to sustainable modes.
Loss of parking for business customers	Visitor parking is needed to support retail activity along London Road.	Additional parking and loading bays have been added on side roads where possible to assist businesses for deliveries and use for customer collection. In addition ‘smart parking’

Objection Theme	Summary of Issues Raised	Officer Response
		technology is proposed to help motorists identify available parking spaces on the London Road.
<b>PROPOSED RAISED ZEBRA CROSSINGS &amp; ENTRY TREATMENTS</b>		
Facilities will create road congestion	Additional zebra crossings on London Road may cause delay for buses.	Traffic modelling is being undertaken and the scheme has to go through a network assurance process with Transport for London to ensure that there is not an unacceptable impact on the transport network. In addition it is proposed that the crossing between the Hospital and the Mosque where there is the highest footfall remains a signalised facility which will reduce the call on this facility).
Road Safety concerns	The proposed zebra near the Mosque and the Hospital near Dunheved Road South may be more unsafe than the current signal controlled crossing.	It is proposed that the crossing between the hospital and the Mosque where there is the highest footfall remains a signalised facility in view of the more vulnerable nature of some of the users in the vicinity of the Hospital. In addition all proposals will be subject to the Road Safety Audit process.
Facilities are unnecessary	Pedestrian crossings are not needed as pedestrians can just cross the road.	This part of London Road is within one of the highest percentiles of casualty harm rate in London. The proposed measures are in line with the suggested range of high priority interventions to reduce the dominance of traffic and to make walking safer, easier and more accessible to all.



**Stage 1 Initial Risk Assessment - Decide whether a full equality analysis is needed**

**1.1 Analysing the proposed change**

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

**Walking and Cycling Programme / Walking and Cycling Strategies**

**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 purpose of the programme is to increase the amount of walking and cycling that occurs in Croydon. This is in order to:

- Provide facilities the new journeys that are created by the growth of the borough
- Improve air quality, safety and environmental performance
- Improve the health of people living, working and visiting the Borough
- Improve access for all sections of the community
- Preserve and enhance the quality of the Borough's built and natural environment

The programme is needed to define / lead / coordinate / deliver these objectives where previously implementation has been split between different teams in the Council.

Walking and Cycling Strategies are being produced to support this programme.

The concept of the Walking and Cycling Programme originated from the Head of Strategic Transport. The programme has support from the Director of Planning and Strategic Transport, the political level, Sustrans and Transport for London.

The Croydon Corporate Plan, Core Strategy, Transport Vision, and The Mayor of London's Transport Strategy all seek to increase the amount of walking and cycling that occurs in Croydon.

**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.

**Programme Definition Stage (at time of initial EqIA)**

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

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

- All Council staff (as pedestrians / cyclists / people with mobility issues)
- The wider community in Croydon, workers and visitors to Croydon.
- Specific Teams in the Council: Public Health, Spatial Planning, Regeneration, Highways, Strategic Transport, Development.
- Transport for London, Greater London Authority, Sustrans.
- Transport campaign groups, The Ramblers Association, Croydon and London Cycle Campaigns

1.2.2	<b>What will be the main outcomes or benefits from making this change for customers / residents, staff, the wider community and other stakeholders?</b>
<p><b>Benefits:</b></p> <ul style="list-style-type: none"> <li>• Increased travel choices</li> <li>• Air quality improvements</li> <li>• Health benefits of active travel</li> <li>• Reduced pressure on roads</li> <li>• Increased quality of the environment</li> <li>• Increase use of facilities</li> <li>• Safer access to schools and other facilities</li> </ul> <p><b>Outcomes:</b></p> <ul style="list-style-type: none"> <li>• Improved cycle facilities</li> <li>• Improved walking facilities</li> <li>• Improved public realm &amp; environmental quality</li> </ul>	
1.2.3	<p><b>Does your proposed change relate to a service area where there are known or potential equalities issues?</b>  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 (<a href="http://www.croydonobservatory.org/">http://www.croydonobservatory.org/</a>)</p>
<p>The EqIA for the walking and cycling programme has identified that the change could potentially impact on the following groups:</p> <ul style="list-style-type: none"> <li>• Age</li> <li>• Disability</li> <li>• Sex / Gender</li> </ul> <p><b>1.0 Age</b>  <b>1.1 Young People</b></p> <p>Pupils and students cycling or walking to go to school/college will benefit from better wayfinding and path quality. A study "South East London Greenways Area study – Consultation Document December 2009" by Sustrans explains "Sedentary lifestyles are causing an obesity epidemic and increasing the risk of health problems such as diabetes heart attack and stroke " The study goes on to quote the following "In London more than one fifth of children are classed as obese" There is guidance from the National Institute of Health and Clinical Excellence promoting the creation of build environments which promote physical activity. A statistic from the NHS quotes that one in 5 children will leave primary school obese and overall 22% of the children in Croydon are classed as obese.</p> <p>The change promotes walking and cycling which cleaner forms of transport and should therefore help improve air quality for this group.</p> <p>Changing the Parks Byelaws have encouraged cyclists to use the parks as alternative routes. One of the main aims of the change route is to be accessible enough for a 12 year old to cycle the route unaccompanied by an adult. Currently, cycle routes are not well designed or maintained and parents are reluctant to let children cycle unaccompanied due to safety issues. As part of the design we have been working towards safe cycling routes that are accessible for all and allow young people to take regular exercise and use parks as a place to learn how to cycle.</p>	

The cycling in parks consultation has raised concerns about cyclists coming into conflict with young people. Young people in parks may be more distracted by activities such as play and less aware of the rules around cycling. This risk can be mitigated by safety and enforcement measures. This also has to be viewed in the context that the parks are already informally used by cyclists (although use is likely to increase). By formalizing routes some risks of pedestrian / cycle conflict can be reduced by amended layouts, signage, improving sightlines, improving widths and other measures.

Footway level cycle tracks have raised concerns about about cyclists coming into conflict with young people. This can be mitigated by providing clear changes in surfacing and improved signage and markings.

Consultation on increasing the share of roadspace given over to cycling has identified concerns that not all groups can cycle (including some in this protected group). This is particularly the case in some of the more hill areas of Croydon. Whilst some routes can be designed to minimise the gradient and electric bikes make a difference (for those who can afford these) it is necessary to ensure that alternative forms of transport are available.

## **1.2 Working age group**

The “Greenways Area Study” from Sustrans highlights that the current growth in London’s population is putting stress on the Transport systems.

Due to this stress on an already over capacity system walking is a key mode of travel. The study quotes “over 20% of journeys in the capital are on foot”. The study explains there is a target to increase journeys made on foot by 1million trips from 2009/10-2001/12.

The study explains that “cycling in London has grown considerably in recent years” On the TFL road network “between 2000/01 and 2007/08 91% more cyclists were observed passing selected counting points”.

The change will open up walking and cycling routes and give the working age group easier access to employment opportunities, services and facilities in Croydon Town Centre.

There is an aim to encourage the use sustainable modes of transport rather than cars (creating modal shift).

The change will also encourage active travel, with accompanying health benefits, especially where time pressured commuters find it difficult to fit in exercise in their daily routine

The change promotes walking and cycling which cleaner forms of transport and should therefore help improve air quality for this group.

Consultation on increasing the share of roadspace given over to cycling has identified concerns that not all groups can cycle (including some in this protected group). This is particularly the case in some of the more hill areas of Croydon. Whilst some routes can be designed to minimize the gradient and electric bikes make a difference (for those who can afford these) it is necessary to ensure that alternative forms of transport are available.

## **1.3 Older and retired people**

The proposed routes will see walking routes upgraded which may be seen as an improvement for older people. This includes dropped kerbs, decluttering and widening existing footways, providing new crossings, better surfacing, signage, lighting, seating and more attractive routes.

As with some other groups there are concerns that older and retired people walking may come into conflict with cyclists. This risk can be mitigated by safety and enforcement measures. This also has to be viewed in the context that routes are already informally used by cyclists (although use is likely to increase). By formalizing routes some risks of pedestrian / cycle conflict can be reduced by amended layouts, signage, improving sightlines, improving widths and other measures. Older and retired people can also benefit from improvements to their health that 'active travel' such as cycling create.

The change promotes walking and cycling which cleaner forms of transport and should therefore help improve air quality for this group.

Footway level cycle tracks have raised concerns about about cyclists coming into conflict with this protected group. This can be mitigated by providing clear changes in surfacing and improved signage and markings.

Consultation on increasing the share of roadspace given over to cycling has identified concerns that not all groups can cycle (including some in this protected group). This is particularly the case in some of the more hill areas of Croydon. Whilst some routes can be designed to minimize the gradient and electric bikes make a difference (for those who can afford these) it is necessary to ensure that alternative forms of transport are available.

#### **1.4 Disability**

The change will see walking infrastructure upgraded which may be seen as an improvement for people with mobility impairments. This includes dropped kerbs, side road entry treatments, decluttering and widening existing footways, providing new crossings, better surfacing, signage, lighting, seating and more attractive routes.

As with some other groups there are concerns that disability groups walking may come into conflict with cyclists. This risk can be mitigated by safety and enforcement measures. This also has to be viewed in the context that routes are already informally used by cyclists (although use is likely to increase). By formalizing routes some risks of pedestrian / cycle conflict can be reduced by amended layouts, signage, improving sightlines, improving widths and other measures.

Disability groups can also benefit from improvements to their health that 'active travel' such as cycling create. Whilst not the view of all disabled people, Wheels for Wellbeing (based in South Norwood Country Park, an award-winning charity supporting disabled people of all ages and abilities to enjoy the benefits of cycling) state that "Cycling can be easier than walking, a way to keep independent, fit and healthy, a mobility aid, and a useful form of everyday transport. Inclusive cycling means everyone can cycle regardless of age, health condition or impairment."

Wheels for Wellbeing state that many aren't aware of the fact that disabled people cycle. Growing numbers do, with some using standard two-wheeled bicycles and others using non-standard cycles - for transport, leisure or sport. However, there are a number of physical, financial and attitudinal barriers that continue to prevent more disabled people in the UK from taking up cycling. These can be summarised as:

- **Cycling infrastructure:** There is a lack of fully inclusive infrastructure across cycle networks. Narrow cycle lanes, steps, speed reduction treatments, physical obstacles, barriers and potholes reduce accessibility for non-standard cycles, which are often wider, longer and heavier than standard bicycles. Accessibility can also be reduced for disabled cyclists who ride on two wheels but who may not be able to lift, carry or walk their cycle.
- **Cycling facilities:** The majority of cycle parking and storage facilities fail to cater for the needs of disabled cyclists. Without reliably available parking facilities at their destination (and fully integrated modes of transport along the way) disabled cyclists will often be

discouraged from venturing out in the first place, thus limiting their options for active travel.

- **Cost:** Non-standard cycles (including specially adapted bicycles) are typically more expensive than standard road bikes, with access to hire and loan schemes also limited. Disabled people are more likely to be on lower incomes than those who are non-disabled, creating a further financial disadvantage when it comes to purchasing the right cycle.
- **Imagery, language and perceptions:** Representations of non-standard cycles and visibly disabled cyclists are absent from most cycling literature. Disabled cyclists are further excluded from cycling culture through use of the word 'bicycle' as a bi-word for a cycle, the branding of e-assist as 'cheating', the perception that cycling is for the fit and athletic, and assumptions like: all cyclists are able to carry or wheel their cycle. This leads to many disabled people assuming, wrongly, that cycling is not an option.
- **Cycles not recognised as mobility aids:** Many disabled people find cycling easier than walking. However, under existing legislation cycles are not listed as a mobility aid (unlike wheelchairs and mobility scooters), meaning disabled cyclists may be asked to dismount in designated non-cycling zones (despite the fact that walking, wheeling or lifting a cycle might be physically impossible for some).<sup>1</sup>

The change promotes walking and cycling by cleaner forms of transport and should therefore help improve air quality for this group.

Footway level cycle tracks have raised concerns about about cyclists coming into conflict with this protected group. This can be mitigated by providing clear changes in surfacing and improved signage and markings (including tactile paving).

Consultation on increasing the share of roadspace given over to cycling has identified concerns that not all groups can cycle (including some in this protected group). This is particularly the case in some of the more hilly areas of Croydon. Whilst some routes can be designed to minimize the gradient and electric bikes make a difference (for those who can afford these) it is necessary to ensure that alternative forms of transport are available.

### 1.5 Sex/Gender

The Greenways study highlights the disparity between men and women making cycle trips: "Approximately twice as many cycle trips made in London are by men and boys than rather women and girls."

Opening new routes will create alternative options for cycling on quieter routes which allow the less confident cyclists of any gender to take up opportunities to cycle. Recent evidence suggests that women cyclists are more affected by bad driver behaviour.<sup>2</sup>

The change promotes walking and cycling which cleaner forms of transport and should therefore help improve air quality for this group.

---

<sup>1</sup> Wheels for Wellbeing *A guide to inclusive cycling* (November 2017)

<sup>2</sup> <https://www.theguardian.com/lifeandstyle/2015/jun/11/female-cyclists-bad-driving-harassment-study-uk-women-men-near-miss>

**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

**Health and Social Inequality**

A key priority for the Council is to work with our partners to make Croydon a stronger fairer place for all our communities. Croydon's Opportunity and Fairness Plan 2016-20 outlines action to tackle inequalities such as educational attainment, health, homelessness, unemployment, crime and social isolation, particularly in the borough's six most deprived wards. Successful delivery of walking and will create more opportunities for Croydon residents and contribute towards greater equality, fairness and better outcomes for all.

Walking and cycling can help people become fitter and healthier. More than one in three of our ten to eleven year-olds are overweight or obese, nearly two in three Croydon adults are overweight or obese and young people in Croydon are growing up in a borough where it's normal to be overweight. We need infrastructure and cultural changes to enable everybody to incorporate exercise into their daily travel routine.<sup>3</sup>

Walking and cycling can also help to provide better access to employment. After cycling to keep fit and for the fun of it, the reason most Londoners give for cycling more, is to save money, and it is cheaper than the alternatives. Using their 'cycletoworkcalculator', Britain's largest cycling organisation, British Cycling, estimates that a London commuter who buys a bike for £500 to travel to work would save £565 a year. This assumes they drive a small car 10 miles to and from work each day, with costs of 37p a mile based on Automobile Association (AA) running cost figures. Their bike would pay for itself in under four months, and the cyclist would burn an average of 500 calories a day.<sup>4</sup> This will not be suitable for everybody (depending on the characteristics of their journey to work and personal circumstances) and costs will vary for larger households.

Consultation on increasing the share of roadspace given over to cycling has identified concerns that not all groups can cycle (including some in this protected group). This is particularly the case in some of the more hill areas of Croydon. Whilst some routes can be designed to minimize the gradient and electric bikes make a difference (for those who can afford these) it is necessary to ensure that alternative forms of transport are available.

**Walking**

Improving walking is part of increasing the activity levels of the people of Croydon. Inactivity is having profound health effects and is a major contributory factor to the levels of obesity in Croydon. In Croydon, one in three children aged 10-11 are overweight or obese. For adults the situation is more serious. Over half of all adults are overweight or obese. This equates to over 170,000 residents. Children in Croydon are growing up in a borough where it is normal to be overweight. From 2007 to 2015, the estimated annual cost of obesity to the NHS in Croydon is predicted to rise by 24%6 (£11.2 million)<sup>5</sup>.

Health inequalities mean that these impacts are felt unequally. Most deprived 4-5 and 10-11 year olds are 2 times more likely to be obese than least deprived<sup>6</sup>.

<sup>3</sup> Croydon's Cycling Strategy 2018-23

<sup>4</sup> Croydon's Cycling Strategy 2018-23

<sup>5</sup> CroydonJoint Strategic Needs Assessment (JSNA) 2013/14 Key-Topic 2 Healthy Weight

<sup>6</sup> Public Health England: Health inequalities in London (2015)

A transport network that favours the motor car over walking can increase inequality. In London up to household incomes of £75k, household car access rises as income increases, flattening off after that point.<sup>7</sup>

## **Cycling**

Croydon does not collect regular quantitative or qualitative data on cycle use however there are other data sources on cycling.

Dr Rachel Aldred, University of Westminster states that:

"Britain's hostile roads force people cycling to tool up, speed up, man up or – more often – give up."

Cycling UK<sup>8</sup> states that in Britain, cycling is highly unequal. Women, older people, and disabled people are all under-represented. Transport for London (TfL) reports that 74% of cycle trips there are made by men, while across England men are twice as likely to cycle to work as are women. Patterns seen in high-cycling countries (such as the Netherlands) can be found in the UK. In Cambridge, there is a roughly equal gender balance and more than one-in-four commuting over-65-year-olds still doing so by cycle. This is compared to London, where 5.2% of commuters aged 30-34 ride to work but under 2% of those aged over 60 do. Providing good cycling environments is particularly important for low-income people without car access, and for people in rural areas with limited other transport options. The recent iConnect<sup>9</sup> study showed that people without cars benefitted more from high-quality separated infrastructure for walking and cycling. Cycling can be an inclusive transport mode, but only if we ensure that the cycling network is democratic and inclusive. We know what people want, and we know the status quo is exclusive. My Near Miss Project<sup>10</sup> research showed that slower cyclists are experiencing three times as many near misses for a given journey distance as quicker cyclists. This feeds through into inequalities experienced by gender, as women – on average – cycle somewhat more slowly than men.

The Cycling in Croydon report to Scrutiny Committee (2014) heard that there are many benefits to cycling including:

- Improved health outcomes including tackling obesity and increasing levels of physical activity by building exercise into everyday lives.
- Cycling as a mobility aid for disabled people. Members heard that cycling is the second most popular form of exercise for disabled people.
- Improving mental health, a sense of well-being and tackling social isolation including in older people.
- Reductions in air pollution and CO2 levels (which benefit all).

More widely, Members heard that there is a lack of cycling infrastructure to provide safe routes for cyclists including children and families and which take account of the needs of disabled cyclists. The Croydon 'donut' – an area surrounding the town centre - is difficult for cyclists to penetrate and cycle through legally and safely despite reasonable routes to and from the outer reaches of the Borough. Contributors at the meeting stated that narrow residential roads when combined with motor vehicles also makes for a difficult cycling environment. Members heard that one head teacher in the borough had banned children from cycling to school as he felt that cycling was not safe enough. The Committee heard that introducing safe routes to schools for parents and children presents a significant opportunity to increase cycling and active travel in the borough.

---

<sup>7</sup> TfL Roads Task Force – Technical Note 12 How many cars are there in London and who owns them?

<sup>8</sup> Article September 2015 in Cycling Magazine

<sup>9</sup> <http://www.iconnect.ac.uk/>

<sup>10</sup> <http://www.nearmiss.bike/>

Increase cycling in parks will make parks an area affected by the proposed change. Croydon does not currently collect park use data, however there is (2010) data from the Wandle Park project. This data gives some indication of the current representation of user groups in Croydon's parks.

- Age Groups: All age-groups were relatively well-represented in the park apart from the 17-24 age group.
- Ethnicity: Black and minority ethnic groups form only 29% of park users whilst being 41% of the catchment area population. A gap remains in activities for women from these groups to participate in.
- Gender: Surveys indicate that the majority of the users of the park are women. According to a national study <sup>11</sup> 51% females visit a park with children compared with 36% of males. As children's play is the second most popular activity in parks it follows that women will tend to be the primary users of open space.
- The Older Community: Over 60s make up 15% of the local catchment area population and are frequent park users. These groups have cited deterrents from visiting parks as poor facilities, poor access, poor provision of seating and poor management and maintenance. Some of the members of these groups are intimidated by the young people, although many members recognise the importance of providing facilities for young people.
- Young People and Families: These groups were well represented although a gap was. Males in the 13-19 age group were better represented in the existing audience due to the relatively good provision of facilities. In 2010 there was a lack of facilities and activities that appealed to teenage girls.
- Information about disabilities and other protected characteristics was not available from this data.

### **Filling Gaps**

Additional information is needed to provide information about disabilities and other protected characteristics.

More data is will be collected and we have taken further steps to ensure all groups are involved in the project (as detailed below in the rest of this assessment).

This includes Croydon Vison, Wheels for Wellbeing, the Mobility Forum, the Cycle Forum, Schools, Friends of Parks Groups and Croydon residents.

---

<sup>11</sup> 'The use of Public Parks in England' 2003 by Sport England, English Heritage and The Countryside Commission



1.2.5	<b>Analyse and identify the likely <u>advantage</u> or <u>disadvantage</u> associated with the change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a “protected characteristic”</b>
-------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

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

	<b>Likely Advantage</b> 😊	<b>Likely Disadvantage</b> ☹️
Disability	<p>Improvements to the walking and cycling network have the ability to improve outcomes for all groups. The change aims to provide convenient, safe and reliable access for all to local amenities and cycle routes.</p> <p>The public realm proposed will be accessible and inclusive, with minimal level changes and good quality street furniture providing opportunities for a resting.</p> <p>This risk needs to be balanced with the potential health benefits to this group of active travel.</p>	<p>Cyclist on shared surfaces may come into conflict with this group. This risk can be mitigated by safety and enforcement measures and improved signage and markings.</p> <p>Cycle routes need to be designed to provide access for hand bikes, etc.</p> <p>Improvements to the cycling network have the ability to improve outcomes for all groups. Current use of cycling is focused more able bodied groups. The Council is engaged in ongoing work to widen participation in walking and cycling as ‘active travel’ The Council needs to ensure this is inclusive and includes people living with a disability.</p> <p>Rest areas to be considered (these are often difficult to install due to concerns regarding antisocial behaviour.</p>
Race/ Ethnicity	<p>Improvements to the walking and cycling network have the ability to improve outcomes for all groups. The change aims to provide convenient, safe and reliable access for all to local amenities and cycle routes.</p>	<p>Current use of walking cycling as travel modes is not evenly distributed across groups. The Council is engaged in ongoing work to widen participation in walking and cycling as ‘active travel’. The Council needs to ensure this is inclusive and includes people of all races / ethnicity.</p> <p>Specific engagement with underrepresented groups is recommended.</p>
Sex	<p>Improvements to the walking and cycling network have the ability to</p>	<p>Current use of walking cycling as travel modes is not evenly</p>

	<p>improve outcomes for all groups. The change aims to provide convenient, safe and reliable access for all to local amenities and cycle routes.</p>	<p>distributed across groups. The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel' The Council needs to ensure this is inclusive and includes people of all genders.</p> <p>Fear of crime and road safety issues have been identified as likely contributing factors.</p>
Transgender	<p>Improvements to the walking and cycling network have the ability to improve outcomes for all groups. The change aims to provide convenient, safe and reliable access for all, providing access to local amenities and cycle routes.</p>	<p>Current use of walking cycling as travel modes is not evenly distributed across groups. The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel'. The Council needs to ensure this is inclusive and includes people of all genders.</p> <p>Fear of crime and road safety issues have been identified as likely contributing factors.</p>
Age	<p>Improvements to the walking and cycling network have the ability to improve outcomes for all groups. The change aims to provide convenient, safe and reliable access for all to local amenities and cycle routes.</p> <p>One of the main aims of the change route is to be accessible enough for a 12 year old to cycle the route unaccompanied by an adult. Currently, cycle routes are not well designed or maintained and parents are reluctant to let children cycle unaccompanied due to safety issues. As part of the design we have been working towards safe cycling routes that are accessible for all and allow young people to take regular exercise and use parks as a place to learn how to cycle.</p> <p>The change will open up walking and cycling routes and give the working age group easier access</p>	<p>Cyclist on shared surfaces may come into conflict with this group. This risk can be mitigated by safety and enforcement measures</p> <p>Current use of cycling is focused on younger and more able bodied groups. The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel'. The Council needs to ensure this is inclusive and includes people of all ages.</p> <p>Rest areas to be considered (these are often difficult to install due to concerns regarding antisocial behaviour.</p>

	<p>to employment opportunities, services and facilities in Croydon Town Centre.</p> <p>The change promotes walking and cycling which cleaner forms of transport and should therefore help improve air quality for this group.</p> <p>The proposed routes will see walking routes upgraded which may be seen as an improvement for older people. This includes dropped kerbs, decluttering and widening existing footways, providing new crossings, better surfacing, signage, lighting, seating and more attractive routes.</p>	
Religion /Belief	<p>Improvements to the walking and cycling network have the ability to improve outcomes for all groups. The change aims to provide convenient, safe and reliable access for all to local amenities and cycle routes.</p>	<p>Current use of walking cycling as travel modes is not evenly distributed across groups. The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel'. The Council needs to ensure this is inclusive and includes people of all religions / beliefs.</p> <p>Specific engagement with faith groups is recommended.</p>
Sexual Orientation	<p>Improvements to the walking and cycling network have the ability to improve outcomes for all groups. The change aims to provide convenient, safe and reliable access for all to local amenities and cycle routes.</p>	<p>Current use of walking cycling as travel modes is not evenly distributed across groups. The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel'. The Council needs to ensure this is inclusive and includes people of all sexual orientation.</p> <p>Fear of crime and road safety issues have been identified as likely contributing factors.</p>
Pregnancy and Maternity	<p>Improvements to the walking and cycling network have the ability to improve outcomes for all groups. The change aims to provide convenient, safe and reliable access for all to local amenities and cycle routes.</p>	<p>Cyclist on shared surfaces may come into conflict with this group. This can be mitigated by designing in a 'comfort zone' and / or providing clear demarcation of the area for cyclists and the area for other users.</p>

		Rest areas to be considered (these are often difficult to install due to concerns regarding antisocial behaviour).
Social inclusion issues	Improvements to the walking and cycling network have the ability to improve outcomes for all groups. The change aims to provide convenient, safe and reliable access for all to local amenities and cycle routes.	Current use of walking cycling as travel modes is not evenly distributed across groups. The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel'. The Council needs to ensure this work achieves the predicted outcomes in terms of social inclusion.
Community Cohesion Issues	Improvements to the walking and cycling network have the ability to improve outcomes for all groups. The change aims to provide convenient, safe and reliable access for all to local amenities and cycle routes.	Current use of walking cycling as travel modes is not evenly distributed across groups. The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel'. The council needs to ensure we engage with community groups across protected characteristics. Opportunities to support and develop current initiatives such as the Interfaith Bike Rid and Wheels for Wellbeing will be investigated. Further work is also required to identify other groups who can be encouraged to walk and cycle.
Delivering Social Value	Improvements to the walking and cycling network have the ability to improve outcomes for all groups. The change aims to provide convenient, safe and reliable access for all to local amenities and cycle routes.	Current use of walking cycling as travel modes is not evenly distributed across groups. The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel'

1.2.6	<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>
<p>The focus of improvements to the walking and cycling network will start initially in the town centre and then spread out to areas in the immediate vicinity. Eventually the network will spread out to the rest of the borough but due to the borough's topography this will be limited in some of the more hilly parts of the south of the borough. This could potentially have an impact on protected groups.</p> <p>Consultation on increasing the share of roadspace given over to cycling has identified concerns that not all groups can cycle (including some in this protected group). This is particularly the case in some of the more hill areas of Croydon. Whilst some routes can be designed to minimize the gradient and electric bikes make a difference (for those who can afford these) it is necessary to ensure that alternative forms of transport are available.</p>	
1.2.7	<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>
<p>The change could potentially impact on the following groups:</p> <ul style="list-style-type: none"> <li>• Age</li> <li>• Disability</li> <li>• Sex / Gender</li> <li>• Pregarancy and maternity</li> </ul>	
1.2.8	<p><b>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?</b></p> <p>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 <i>etc.</i></p> <p><b>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.</b></p>
<p>Yes - Improvements to the walking and cycling network have the ability to improve outcomes for all groups. The change aims to provide convenient, safe and reliable access for all to local amenities and cycle routes.</p> <p>Current use of walking cycling as travel modes is not evenly distributed across groups. The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel', particularly to improve health outcomes. As current use of walking, cycling is not evenly distributed across groups, the Council needs to ensure all protected groups are engaged as part of this process.</p>	

1.2.9	<p><b>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?</b></p> <p>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</p> <p><b>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.</b></p>
<p>Yes - Improvements to the walking and cycling network have the ability to improve outcomes for all groups. The change aims to provide convenient, safe and reliable access for all to local amenities and cycle routes.</p> <p>Current use of walking cycling as travel modes is not evenly distributed across groups. The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel', particularly to improve health outcomes. As current use of walking, cycling is not evenly distributed across groups, the Council needs to ensure all protected groups are engaged as part of this process.</p>	
1.2.10	<p><b>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?</b></p> <p>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.</p> <p><b>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response</b></p>
<p>Yes - Improvements to the walking and cycling network have the ability to improve outcomes for all groups. The change aims to provide convenient, safe and reliable access for all to local amenities and cycle routes.</p> <p>Current use of walking cycling as travel modes is not evenly distributed across groups. The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel', particularly to improve health outcomes. As current use of walking, cycling is not evenly distributed across groups, the Council needs to ensure all protected groups are engaged as part of this process.</p>	

### 1.3 Decision on the INITIAL 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	Response
<p><b>Yes, further equality analysis is required</b></p>	<p>Improvements to the walking and cycling network have the ability to improve outcomes for all groups. The change aims to provide convenient, safe and reliable access for all to local amenities and cycle routes.</p> <p>Current use of walking cycling as travel modes is not evenly distributed across groups. The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel', particularly to improve health outcomes.</p> <p>Full EQIA will be undertaken as part of the Delivery Phase of the programme, we will ensure this is an inclusive process and that we engage with residents and communities from all protected groups to ensure we identify any equality and inclusion issues and actions to mitigate these</p>

### Stage 2 FULL EQIA

#### 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.

<p><b>2.1</b></p>	<p><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></p> <p>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.</p>
<p><u>Wheels for Wellbeing – Guide to Inclusive Cycling (November 2017)</u> It is a common myth that disabled people don't (or can't) cycle. According to TfL, in London alone 15% of disabled people use a cycle to get around occasionally or often, compared to 18% of non-disabled people. Many other myths around disabled cyclists abound.</p> <p><u>DfT inclusive transport strategy (2018)</u> Disabled people should have the same access to transport as everybody else, to be able to go where everyone else goes and to do so easily, confidently and without extra cost. This will be delivered through the key themes of the Inclusive Transport Strategy:</p>	

- Promotion of passenger rights and enforcement - All passengers should be clear on what the service they can expect, and confident that reporting non-compliance will lead to enforcement.
- Better Staff Training - Transport staff (frontline and managerial) should have greater understanding of the needs of disabled people and their legal rights, and therefore provide better assistance.
- Improved Information - Information should be provided in formats that all passengers can access and understand, both before and during a journey.
- Inclusive Physical infrastructure - Vehicles, stations and streetscapes should be designed and built so that they are inclusive and easy to use.
- Future of Inclusive Transport - New services and business models enabled by advances in technology should provide opportunities for all, and be designed from the outset with disabled people in mind.

#### London Cycle Design Standards (2014)

The six core design outcomes, which together describe what good design for cycling should achieve, are:

- Safety,
- Directness,
- Comfort,
- Coherence,
- Attractiveness and
- Adaptability.

These are based on international best practice and on an emerging consensus in London about aspects of that practice that we should adopt in the UK. They are important not just for cyclists but for all users of streets, public spaces, parks and watersides, where investment in cycling has the potential to improve the quality of place.

Cyclists and pedestrians should not be forced together where there is space to keep them apart, creating unnecessary conflict which can only increase as the number of cyclists rises. We have a strong preference against schemes requiring cyclists and pedestrians to share the same highway space, wherever they can be avoided. It will be necessary to use some shared areas in our cycle routes, particularly where the space is wide, but we will prefer to create delineated cycle tracks across it, perhaps with sloping, pedestrian-friendly kerbs or different surfacing.

Cyclists and pedestrians should not share the same space at crossings and junctions. Clearly delineated separate and/or parallel routes should be provided for cyclists and pedestrians. Typical bad cycle design deals with junctions by making cyclists pretend to be pedestrians, bringing them on to the pavement and having them cross the road, often in several stages, on toucan crossings.

#### Inclusive Transport Strategy: Achieving Equal Access for Disabled People Implications for Low Volume Shared Surface Streets (Topic Note produced by Phil Jones Associates, 2018)

The temporary withdrawal of LTN 1/11 and request that Local Authorities pause the development of shared space schemes which incorporate a level surface has the potential to result in some confusion amongst authorities and built environment professionals. This is particularly the case for what have been termed 'shared surface' streets on new developments, but which could also now be called 'pedestrian prioritised' streets.

Visually impaired people are faced with the challenges of navigating and crossing busy level surface streets such as Exhibition Road. There is a strong case for continuing to promote and provide shared surface/pedestrian prioritised streets where traffic volumes are low, particularly in new residential developments. This type of design has been in recommended Government



guidance for over 50 years and has been applied extensively throughout the country. It is recommended in Manual for Streets, which remains in force as Government guidance.

#### National Planning Policy Framework (2018)

Paragraph 110 states that applications for development should:

- Give priority to pedestrian and cycle movements, both within the scheme and with neighbourhood areas...
- Address the needs of people with disabilities and reduced mobility in relation to all modes of transport
- Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards...

#### Cycle Infrastructure Design Local Transport Note 1/20 July 2020

The built environment should be accessible to all, including young people, older people, and disabled people. The concept of 'inclusive design' underpins the document, although it is acknowledged that what individual people consider to be acceptable will vary. Design should begin with the principle that all potential cyclists and their machines should be catered for in all cycle infrastructure design. Cycle routes must be accessible to recumbents, trikes, handcycles, and other cycles used by disabled cyclists. Many current tracks and lanes are too narrow or constrained to meet these objectives. To allow faster cyclists to overtake, and make room for non-standard bikes, cycle tracks should ideally be 2 metres wide in each direction, or 3 to 4m (depending on cycle flows) for bidirectional tracks though there may have to be exceptions.

Data collected by Transport for London<sup>8</sup> found that the proportion of disabled Londoners who sometimes use a cycle to get around (15%) is only slightly less than for non-disabled Londoners (18%), demonstrating that cycling is an important mode of transport for everyone. The role of cycling as an aid to mobility is often overlooked. It can help many people to travel independently, but only if the infrastructure is accessible to a range of cycles used by people with children and disabled people. It is therefore very important to ensure that new cycle infrastructure is designed for use by everyone.

It is particularly important to make local disability groups aware of changes, which may impact on their ability to navigate, or to gain access to facilities such as disabled parking spaces. Engagement sessions with local disabled people may help identify and communicate alternative accessible routes. The provision of travel buddies to help visually impaired people learn to adjust to changes along previously familiar routes at the start of trial schemes may be particularly helpful and is recommended.

Designers should consider comfort for all users including children, families, older and disabled people using three or four-wheeled cycles. Families are more likely to use off-carriageway facilities. Young children may need additional space to wobble or for an accompanying parent to ride alongside.

Local authorities are bound by the Equality Act 2010 in discharging their functions, which includes managing their road networks. Designers should provide infrastructure that is accessible to all, and the dimensions and other features set out in this guidance should help ensure that their designs comply with the Public Sector Equality Duty. An Access Audit should be undertaken of all proposals to ensure that a scheme meets the needs of those with protected characteristics under the Equality Act 2010, particularly people with a disability. The Access Audit (also formerly known as a DDA audit, Disability Discrimination Act Audit or Disabled Access Audit) is an assessment of a building, a street environment or a service against best-practice standards to benchmark its accessibility for disabled people. It may form part of an overall Equality Impact Assessment.

Deliberately restricting space, introducing staggered barriers or blind bends to slow cyclists is likely to increase the potential for user conflict and may prevent access for larger cycles and disabled people and so should not be used.

It is more difficult for pedestrians, especially disabled people, to cross a two-way cycle track where they do not have priority.

Kerbed island separation or light segregation (see Figure 6.15) that provides a buffer zone of at least 0.5m between cyclists and parked vehicles is recommended to minimise risk of collision between cyclists and vehicle doors. A clear, level width of 2.0m is required alongside disabled parking bays to allow users to unload a wheelchair and turn within the space.

Where a shared use facility is being considered, early engagement with relevant interested parties should be undertaken, particularly those representing disabled people, and pedestrians and cyclists generally. Engaging with such groups is an important step towards the scheme meeting the authority's Public Sector Equality Duty.

Bus stop boarders introduce an area of shared use directly at the point where people board and alight the bus. Because of the potential for conflict this brings between pedestrians and cyclists, this layout is best suited to bus and tram stops with less frequent services and lower passenger and pedestrian volumes. Where a bus/tram stop boarder is being considered, early engagement with relevant interested parties should be undertaken, including those representing disabled people, and pedestrians and cyclists generally. Engaging with such groups is an important step towards the scheme meeting the authority's Public Sector Equality Duty.

Reducing traffic flow to enable cycling in mixed traffic streets can be achieved through a range of measures involving area-wide treatments across a neighbourhood, usually with enhancements to the appearance of key streets as illustrated in Figure 7.3. 31 Inclusive mobility (DfT, 2005)

Encouraging through traffic to use main roads can provide benefits for pedestrians and residents, particularly children and vulnerable adults, as well as enabling cycling. This can be achieved through implementing measures such as turning bans and one way streets, and by mode filtering (see paragraph 7.1.5). These measures also have the benefit of making short journeys quicker on foot or cycle compared to driving, providing a disincentive to using a car for short trips. Care should be taken that traffic management measures do not exclude disabled people. Good quality inclusive walking environments should be provided throughout, as set out in Inclusive mobility.<sup>31</sup> Access and car parking for blue badge holders should be retained for these areas. Disabled cyclists who cannot dismount and walk their cycles will need to be allowed access.

Vehicle Restricted Areas - There should always be a preference for allowing cyclists to access VRAs unless there is good evidence that this would cause significant safety problems. However, the possible impacts on pedestrians, and disabled people particularly, must be considered carefully. Visually impaired people, in particular, may not feel comfortable sharing a pedestrianised area with cyclists.

Textured surfaces such as block paving and setts can help reinforce speed reduction. They provide a visual and audible reminder that the section of carriageway is a low speed environment. Because these can create high levels of discomfort, in particular for disabled cyclists, older and younger cyclists, they should be used sparingly. Overrun areas can be used around junctions to help visually narrow the entrance to the junction while maintaining access for larger vehicles.

Measures can be used to reduce cycle speed which are broadly similar to those used for motor traffic, albeit at reduced scale, including horizontal deflection, sinusoidal speed humps and thermoplastic rumble strips. These traffic calming devices will inevitably also introduce potential hazards and discomfort for disabled users (both pedestrians and cyclists). They should be used sparingly and only in response to site-specific problems that cannot be addressed in another way.

**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.**

<b>Group's with a "Protected characteristic" and broader community issues</b>	<b>Description of potential advantageous impact</b>	<b>Description of potential disadvantageous impact</b>	<b>Evidence Source</b>
Disability	<p>If cycles routes are designed to provide access for hand bikes etc, this will lead to increase use of cycling for this protected group</p> <p>Address the needs of people with disabilities and reduced mobility in relation to all modes of transport</p> <p>Visually impaired people are faced with the challenges of navigating and crossing busy level surface streets such as Exhibition Road. There is a strong case for continuing to promote and provide shared surface/pedestrian prioritised streets where traffic volumes are low, particularly in new residential developments.</p> <p>Disabled people should have the same access to transport as everybody else, to be able to go where everyone else goes and to do so easily, confidently and without extra cost</p> <p>Convenient, safe and reliable access for all to local amenities and cycle routes, particularly where non-standard bikes and trikes are safely accommodated.</p>	<p>Cyclist on shared surfaces may come into conflict with this group.</p> <p>This risk can be mitigated by safety and enforcement measures.</p> <p>Cycle routes need to be designed to provide access for hand bikes, etc.</p> <p>Improvements to the cycling network have the ability to improve outcomes for all groups. Current use of cycling is focused more able bodied groups. The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel, particularly working with Wheels for Wellbeing and the Mobility Forum. The Council needs to ensure this is an inclusive network and includes people living with a disability.</p> <p>Impacts on bus passengers due to relocations of bus stops.</p>	<p>Scheme consultations</p> <p>Census information, TfL travel information</p> <p>Scheme consultation reponses</p> <p>Mobility Forum and Wheels for Wellbeing Engagement.</p> <p>Subject literature.</p>

<p>Pregnancy and Maternity</p>	<p>Improvements to the walking and cycling network have the ability to improve outcomes for all groups, particularly where non-standard bikes and trikes are safely accommodated.</p> <p>The change aims to provide convenient, safe and reliable access for all to local amenities and cycle routes.</p> <p>Outcomes will vary between walking and cycling and will depend on the individual circumstances eg different stages of pregnancy.</p>	<p>Cyclist on shared surfaces may come into conflict with this group.</p> <p>This risk can be mitigated by safety and enforcement measures.</p> <p>Cycle routes need to be designed to provide access for hand bikes, etc.</p>	<p>Scheme consultation responses</p>
<p>Age</p>	<p>Improvements to the walking and cycling network have the ability to improve outcomes for all groups. The change aims to provide convenient, safe and reliable access for all to local amenities and cycle routes.</p> <p>Use of walking cycling to be increased across this, group is beneficial, particularly to help maintain activity amongst the elderly and also to set good 'active' travel patterns for younger groups. Safe walking and cycling routes are particularly important for young families as it is at this stage that car usage increases due to the lack of safe and convenient alternatives.</p> <p>Alternatives to the private motor vehicle, will potentially provide additional benefit to some age groups more than other groups, Personal car ownership varies by age and gender as follows:</p> <ul style="list-style-type: none"> <li>• Broadly, car ownership increases with age up to around 50-60 years old and then declines beyond that.</li> <li>• On average, 46 per cent of men</li> </ul>	<p>Cyclist on shared surfaces may come into conflict with this group.</p> <p>This risk can be mitigated by safety and enforcement measures.</p> <p>Cycle routes need to be designed to provide access for hand bikes, etc.</p> <p>Impacts on bus passengers due to relocations of bus stops.</p>	<p>Scheme consultations          Census information, TfL travel information</p>

	<p>and 34 per cent of women have access to a car in London.</p> <ul style="list-style-type: none"> <li>• Across all age bands, car ownership is lower amongst women, with this gap increasing beyond age 40. <sup>12</sup></li> </ul>		
Race/ Ethnicity	<p>Improvements to the walking and cycling network have the ability to improve outcomes for all groups. The change aims to provide convenient, safe and reliable access for all to local amenities and cycle routes.</p> <p>Variations in rates of walking and cycling have been observed across different races / ethnicities, with cultural factors likely to play a role. Work with schools and other community groups is important in ensuring the potential benefits of walking and cycling are distributed as far as possible.</p> <p>By providing alternatives to the private motor vehicle, potentially will provide additional benefit to non-white ethnic groups. Car ownership is highest amongst London residents of White ethnic origin, with car ownership around a third lower amongst Black and Mixed or Other ethnic groups. Asian families are more likely than other ethnic minority groups to own a car. Note that car ownership patterns vary substantially between different groups within the 'Asian' categorisation, so that Bangladeshi households, for example, are much less likely to own a car than Indian households.<sup>13</sup></p>	<p>Current use of walking cycling as travel modes is not evenly distributed across groups. The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel'. The Council needs to ensure this is inclusive and includes people of all races / ethnicity</p>	<p>Census information, TfL travel information, scheme consultation responses</p>

<sup>12</sup> Transport for London: *Roads Task Force – Technical Note 12 -How many cars are there in London and who owns them?* (2013)

<sup>13</sup> Transport for London: *Roads Task Force – Technical Note 12 -How many cars are there in London and who owns them?* (2013)

Gender	<p>Improvements to the walking and cycling network have the ability to improve outcomes for all groups. The change aims to provide convenient, safe and reliable access for all to local amenities and cycle routes.</p> <p>Cycling rates in particular vary with gender and research has linked this to the lack of safe infrastructure. Similarly walking rates vary and this has been linked to perceptions of personal safety, particularly on unlit routes with a lack of overlooking.</p> <p>Alternatives to the private motor vehicle, will potentially provide additional benefit to females at lower income levels more than other groups, due to the interaction between income, gender and car ownership. At lower income levels, the difference between male and female car ownership is greater, with the gap reducing as income rises. So, in households with an income less than £25k a year, car ownership amongst women is 68 per cent of that for men, whereas amongst households with a household income over £100k, car ownership amongst women is 91 per cent that of men.<sup>14</sup></p>	<p>Current use of walking cycling as travel modes is not evenly distributed across groups. The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel' The Council needs to ensure this is inclusive and includes people of all genders, and focusing on safety issues.</p>	<p>Census information, TfL travel information, scheme consultation responses (most recently October 2021).</p>
Transgender	<p>Improvements to the walking and cycling network have the ability to improve outcomes for all groups. The change aims to provide convenient, safe and reliable access for all to local amenities and cycle routes.</p> <p>Whilst no specific research has identified the impacts on this protected group, cycling rates in particular vary with gender and</p>	<p>Current use of walking cycling as travel modes is not evenly distributed across groups. The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel'. The Council needs to ensure this is inclusive and includes people of all genders and focusing on</p>	<p>Census information, TfL travel information, scheme consultation responses</p>

<sup>14</sup> Transport for London: *Roads Task Force – Technical Note 12 -How many cars are there in London and who owns them?* (2013)

	<p>research has linked this to the lack of safe infrastructure. Similarly walking rates vary and this has been linked to perceptions of personal safety, particularly on unlit routes with a lack of overlooking.</p>	<p>safety issues.</p>	
Religion /Belief	<p>Whilst no specific research has identified the impacts on this protected group, rates of walking and cycling are likely to vary in line with other related socioeconomic and cultural factors.</p> <p>Improvements to the walking and cycling network have the ability to improve outcomes for all groups. The change aims to provide convenient, safe and reliable access for all to local amenities and cycle routes.</p> <p>Significant travel times to get to places of worship have been observed as religious communities are often widely dispersed. There is therefore potential to facilitate these journeys through improved walking and cycling networks.</p>	<p>Current use of walking cycling as travel modes is not evenly distributed across groups. The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel'. The Council needs to ensure this is inclusive and includes people of all religions / beliefs. The interfaith bike ride is a good example of this work.</p> <p>Significant use of cars to get to places of worship has been observed as religious communities are often widely dispersed. The potential reallocation of roadspace away from the private motor vehicle will provide new travel opportunities but will have some dis-benefits for car users.</p>	<p>Census information, TfL travel information, consultation</p>
Sexual Orientation	<p>Whilst no specific research has identified the impacts on this protected group, rates of walking and cycling are likely to vary in line with other socioeconomic and cultural factors.</p> <p>Improvements to the walking and cycling network have the ability to improve outcomes for all groups. The change aims to provide convenient, safe and reliable access for all to local amenities and cycle routes.</p>	<p>Current use of walking cycling as travel modes is not evenly distributed across groups. The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel'. The Council needs to ensure this is inclusive and includes people of all sexual orientation.</p>	<p>Census information, TfL travel information, scheme consultation responses</p>

<p>Social inclusion</p>	<p>Improvements to the walking and cycling network have the ability to improve outcomes for all groups. The change aims to provide convenient, safe and reliable access for all to local amenities and cycle routes.</p> <p>Alternatives to the private motor vehicle, can potentially improve social inclusion. Analysis of car ownership by household characteristics, including the presence of children in the household and life stage has been undertaken by Transport for London using the London Travel Demand Survey 2005/11:</p> <ul style="list-style-type: none"> <li>• Household car ownership is higher in households with children than those without, in each income band. The difference is greatest at household incomes between £25,000 and £49,999, and smallest at incomes over £75,000. Overall, 68 per cent of households with children have access to at least one car, compared to 52 per cent of households who do not have children.</li> <li>• Of the households with children, car access is highest in households where the youngest child is old enough to attend school (5 – 17). Overall, households with under 5s have similar car access rates to those with no children under 18, although 85 per cent of pre-school households in the £25,000 - £49,999 income band have access to a car, compared to 76 per cent of households with no under 18s.</li> </ul>	<p>Current use of walking and cycling as travel modes is not evenly distributed across groups. The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel'. The Council needs to ensure this work achieves the predicted outcomes in terms of social inclusion.</p>	<p>Census information, TfL travel information, scheme consultation responses</p>
-------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------



	<ul style="list-style-type: none"> <li>• Young adults, and those under 44 with no children have the lowest rates of household access to a car, at 44 per cent. Households with retired people have only slightly higher access at 48 per cent, although this is considerably higher for those with incomes above £25,000.</li> <li>• As one would expect, the general trend is for household car access to rise as household income increases, Figure 7 shows that car ownership rises steadily with income amongst households with incomes of up to £75k a year. Beyond this point, car ownership no longer rises with income, remaining at just over 80 per cent on average.<sup>15</sup></li> </ul>		
Community Cohesion	<p>Improvements to the walking and cycling network have the ability to improve outcomes for all groups. The change aims to provide convenient, safe and reliable access for all to local amenities and cycle routes.</p>	<p>Current use of walking cycling as travel modes is not evenly distributed across groups. The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel'.</p> <p>The council needs to ensure we engage with community groups across protected characteristics. Opportunities to support and develop current initiatives such as the Interfaith Bike Rid and Wheels for Wellbeing will be investigated. Further work is also required to identify other groups who can be encouraged to walk and cycle.</p>	<p>Census information, TfL travel information, scheme consultation responses</p>

<sup>15</sup> Transport for London: *Roads Task Force – Technical Note 12 -How many cars are there in London and who owns them?* (2013)

Delivering Social Value	Improvements to the walking and cycling network have the ability to improve outcomes for all groups. The change aims to provide convenient, safe and reliable access for all to local amenities and cycle routes.	Current use of walking cycling as travel modes is not evenly distributed across groups. The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel'	Census information, TfL travel information, scheme consultation responses
-------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------

**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?**

It is always difficult to predict the impact of individual schemes on all groups. Therefore as part of any scheme consultation, ward councillors (who have good local knowledge), key community groups and any groups identified as part of Equality Impact Assessment will be specifically targeted during the formal consultation. This includes the Croydon Cycle Campaign, The Mobility Forum and Croydon Vision.

Whilst we will monitor impacts on all protected groups, specific protected groups that we aim to target are as follows:

- Age
- Social inclusion
- Disability
- Race/ Ethnicity

**Social inclusion**

Recent research<sup>16</sup> on loneliness during the pandemic has three main findings:

- People who felt most lonely prior to Covid in the UK now have even higher levels of loneliness. This increase began as physical distancing, shielding and lockdown measures were introduced in the UK, in March 2020.
- Adults most at risk of being lonely, and increasingly so over this period, have one or more of the following characteristics: they are young, living alone, on low incomes, out of work and, or with a mental health condition.
- The impact on wellbeing from people at risk of loneliness is likely to be compounded by other economic and social impacts experienced by the same people, such as those experiencing job losses and health anxieties.

Research also found that risk factors for loneliness were near identical before and during the pandemic. Young adults, women, people with lower education or income, the economically inactive, people living alone, and urban residents had a higher risk of being lonely. Some people who were already at risk for being lonely (e.g. young adults aged 18-30, people with low household income, and adults living alone) experienced a heightened risk during the COVID-19 pandemic compared to before COVID-19. Further, being a student emerged as a higher risk factor during lockdown than usual.<sup>17</sup>

<sup>16</sup> How has Covid and associated lockdown measures affected loneliness in the UK? What Works Wellbeing in partnership with UCL. 2020.

<sup>17</sup> Who is lonely in lockdown? Cross-cohort analyses of predictors of loneliness before and during the COVID-19 pandemic. Feifei Bu, Andrew Steptoe, Daisy Fancourt

Digital exclusion is a key driver of social isolation. It is important to ensure that people without internet access or who do not use the internet still receive information in an appropriate format and are helped to get online if they wish to do so.

Communities are self-organising and there are many imaginative responses such as that are helping to keep people connected. In terms of transport improvements there is an opportunity to work with community groups to improve the local area and provide opportunities for increasing social inclusion:

“There’s definitely the issue of meeting other neighbours and being connected to them. If everyone got involved it would make a massive difference. A lot of people I know in London don’t know anyone, they don’t know any neighbours, nothing. London can be a lonely place for a lot of people. We’ve got a lot of hostel-type accommodation in Thornton Heath – if you’re just put there and you don’t know anybody, then you are going to be pretty miserable, and you are going to throw rubbish on the streets because you’re not going to be happy with where you’re are, what you’re doing, you’re going to have no commitment at all to the area. Thornton Heath Community Action Team’s objective is...to make Thornton Heath cleaner and greener. We have some really committed members. 20 to 30 people turn up even when it’s raining. Amy, Thornton Heath Community Action Team.”<sup>18</sup>

**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.

<b>Group’s with a “Protected characteristic” and broader community issues</b>	<b>Missing information and description of potential disadvantageous impact</b>	<b>Proposed action to gather information</b>
Disability	<p>Information on the detailed impact of individual schemes on protected groups</p> <p>Use of walking and cycling facilities by protected groups.</p>	<p>Through the consultation process on individual schemes</p> <p>Identify the potential for data to be gathered at a more local level on annual basis through travel surveys.</p>
Pregnancy and Maternity	<p>Information on the detailed impact of individual schemes on protected groups</p> <p>Use of walking and cycling facilities by protected groups.</p>	<p>Through the consultation process on individual schemes</p> <p>Identify the potential for data to be gathered at a more</p>

<sup>18</sup> Croydon Opportunity & Fairness Commission Final report *A better Croydon for everyone* (2016) [https://www.croydon.gov.uk/sites/default/files/2021-02/Croydon\\_Opportunity\\_%26\\_fairness%20Commission\\_final\\_report.pdf](https://www.croydon.gov.uk/sites/default/files/2021-02/Croydon_Opportunity_%26_fairness%20Commission_final_report.pdf)

		local level on annual basis through travel surveys.
Age	Information on the detailed impact of individual schemes on protected groups  Use of walking and cycling facilities by protected groups.	Through the consultation process on individual schemes  Identify the potential for data to be gathered at a more local level on annual basis through travel surveys.
Race/ Ethnicity	Use of walking and cycling facilities by protected groups.	Identify the potential for data to be gathered at a more local level on annual basis through travel surveys.
Gender	Use of walking and cycling facilities by protected groups.	Identify the potential for data to be gathered at a more local level on annual basis through travel surveys.
Transgender	Use of walking and cycling facilities by protected groups.	Identify the potential for data to be gathered at a more local level on annual basis through travel surveys.
Religion /Belief	Use of walking and cycling facilities by protected groups.	Identify the potential for data to be gathered at a more local level on annual basis through travel surveys.
Sexual Orientation	Use of walking and cycling facilities by protected groups.	Identify the potential for data to be gathered at a more local level on annual basis through travel surveys.
Social inclusion	Use of walking and cycling facilities by protected groups.	Identify the potential for data to be gathered at a more local level on annual basis through travel surveys.
Community Cohesion	Use of walking and cycling facilities by protected groups.	Identify the potential for data to be gathered at a more

		local level on annual basis through travel surveys.
Delivering Social Value	Use of walking and cycling facilities by protected groups.	Identify the potential for data to be gathered at a more local level on annual basis through travel surveys.

### 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.

<b>3.1</b>	<b>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.</b>			
<b>Equality Group (Protected Characteristic)</b>	<b>Potential disadvantage or negative impact e</b>	<b>Action required to address issue or minimise adverse impact</b>	<b>Action Owner</b>	<b>Date for completing action</b>
Disability	<p>Cyclist on shared surfaces may come into conflict with this group.</p> <p>Cycle routes need to be designed to provide access for hand bikes, etc.</p> <p>Impacts on bus passengers due to relocations of bus stops.</p>	<p>This risk can be mitigated by safety and enforcement measures.</p> <p>Improvements to the cycling network have the ability to improve outcomes for all groups. Current use of cycling is focused more able bodied groups. The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel'. The Council needs to ensure this is inclusive and includes people living with a disability.</p> <p>We will continue to work with organizations such as Wheels for Wellbeing to ensure that the network is suitable for accessible bicycles.</p>	<p><b>Programme Manager</b></p> <p><b>Head of Strategic Transport</b></p>	<p><b>Ongoing on scheme by scheme basis</b></p> <p><b>Ongoing – reviewed annually</b></p>

		Review schemes to ensure that bus impacts are minimized and / or mitigated to ensure disabled access.		
Pregnancy and Maternity	Cyclist on shared surfaces may come into conflict with this group. This can be mitigated by designing in a 'comfort zone' and / or providing clear demarcation of the area for cyclists and the area for other users.	This risk can be mitigated by safety and enforcement measures.  Cycle routes need to be designed to provide access for hand bikes, etc.  Use of walking cycling to be increased across group.	<b>Programme Manager</b>	<b>Ongoing on scheme by scheme basis</b>
Age	Cyclist on shared surfaces may come into conflict with this group. This risk can be mitigated by safety and enforcement measures  Current use of walking & cycling is focused on younger and more able bodied groups.	This risk can be mitigated by safety and enforcement measures.  The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel'. The Council needs to ensure this is inclusive and includes people of all ages.	<b>Programme Manager</b>  <b>Head of Strategic Transport</b>	<b>Ongoing on scheme by scheme basis</b>  <b>Ongoing – reviewed annually</b>
Race/ Ethnicity	Current use of walking & cycling as travel modes is not evenly distributed across groups.	The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel'. The Council needs to ensure this is inclusive and includes people of all races / ethnicity.	<b>Head of Strategic Transport</b>	<b>Ongoing – reviewed annually</b>
Gender	Current use of walking & cycling as travel modes is not evenly distributed across groups.	The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel'. The Council needs to ensure this is inclusive and includes people of all genders.	<b>Head of Strategic Transport</b>	<b>Ongoing – reviewed annually</b>

Transgender	Current use of walking & cycling as travel modes is not evenly distributed across groups.	The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel'. The Council needs to ensure this is inclusive and includes people of all genders.	<b>Head of Strategic Transport</b>	<b>Ongoing – reviewed annually</b>
Religion /Belief	Current use of walking & cycling as travel modes is not evenly distributed across groups.	The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel'. The Council needs to ensure this is inclusive and includes people of all or no religion / belief	<b>Head of Strategic Transport</b>	<b>Ongoing – reviewed annually</b>
Sexual Orientation	Current use of walking & cycling as travel modes is not evenly distributed across groups.	The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel'. The Council needs to ensure this is inclusive and includes people of all sexual orientation.	<b>Head of Strategic Transport</b>	<b>Ongoing – reviewed annually</b>
Social inclusion	Current use of walking & cycling as travel modes is not evenly distributed across groups.	The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel'. The Council needs to ensure this is inclusive and specifically includes people living with a disability and older groups, ensuring that the network is designed to accommodate a wide range of non-standard bikes and promoting walking and cycling to these groups.	<b>Head of Strategic Transport</b>	<b>Ongoing – reviewed annually</b>
Community Cohesion	Current use of walking & cycling as travel modes is not evenly distributed across groups.	The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel'.. The council needs to ensure we engage with community groups across protected characteristics, supporting events like the interfaith bike ride which is about celebrating diversity and different faiths in the Borough and thereby will help us work towards	<b>Head of Strategic Transport</b>	<b>Ongoing – reviewed annually</b>

		achieving community cohesion.		
Delivering Social Value	Current use of walking & cycling as travel modes is not evenly distributed across groups.	The Council is engaged in ongoing work to widen participation in walking and cycling as 'active travel' This is linked to enhancing corporate social responsibility /social value in relation to supporting improved environmental outcomes such as cycling and walking to work, schools , etc.	<b>Head of Strategic Transport</b>	<b>Ongoing – reviewed annually</b>

<b>3.2</b>	<b>How will you ensure that the above actions are integrated into relevant annual department or team service plans and the improvements are monitored?</b>
------------	------------------------------------------------------------------------------------------------------------------------------------------------------------

The service plan for the Strategic Transport Team includes projects that:

- will take physical measures to improve the walking and cycling network and mitigate any concerns of protected groups.
- Increase access to walking and cycling across protected groups.

Discussions are progressing with other teams with regards to enforcement on pedestrian and cycle facilities. Measures agreed working with community groups on awareness of the rules and regular patrols by the relevant enforcement officers.

<b>3.3</b>	<b>How will you share information on the findings of the equality analysis with customers, staff and other stakeholders?</b>
------------	------------------------------------------------------------------------------------------------------------------------------

The equality analysis will be published on the council's website. It will also be provided, used and reviewed as part of the ongoing programme of consultation on walking and cycling schemes.

<b>Section 4 Decision on the proposed change</b>		
--------------------------------------------------	--	--



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

<b>Decision</b>	<b>Definition</b>	<b>Yes / No</b>
<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	Yes



	groups through the proposed change. We are going to take action to make sure these opportunities are realised.	
<b>We will continue with the proposed change as planned because it will be within the law.</b>	<p>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.</p> <p>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.</p>	No
<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.	
No		
<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.	
<b>The equality analysis will be made available on the Council's website and will be available during consultations on individual schemes.</b>		
<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	
<b>This analysis will be updated annually as a minimum. There will also be further reviews of this document as each scheme goes forward for consultation.</b>		
<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.	


## REVIEW OF EQIA

REVISION HISTORY		
<b>Initial EQIA</b>		
<b>Officers approval</b>	<b>Name and position</b>	<b>Date</b>
<b>Report author</b>	 Tom Sweeney Programme Manager – Walking and Cycling	4/4/17
<b>Director</b>	 Director of Planning and Strategic Transport	19/6/17
<b>Feedback on Equality Analysis (Stage 1)</b>		
<b>Name of Officer</b>	Yvonne Okiyo	
<b>Date received by Officer</b>	8.7.18	Please send an acknowledgement
<b>Should a full equality analysis be carried out?</b>	Yes	A full equality analysis will be required as part of the delivery phase of the programme in order to identify any equality and inclusion issues and put in place actions to mitigate these.
<b>Review By</b>	<b>Summary of Changes</b>	<b>Revision Date</b>
<b>Tom Sweeney</b>	Above review incorporated into initial EQIA	10/07/18

Full EQIA		
<b>Review By</b>	<b>Summary of Changes</b>	<b>Revision Date</b>
<b>Tom Sweeney</b>	Initial Full EQIA	17 June 2019
Yvonne Okiyo	Review by lead on equality analysis	04 July 2019
<b>Tom Sweeney</b>	Reviewed following Streetspace scheme implementation and in line with new LTN1/20.	2 August 2021
<b>Denise McCausland</b>	Review of EQIA by corporate Equalities	14/12/21
<b>Tom Sweeney</b>	Document updated following above comments.	20/12/21

### Decision on the FULL equality analysis

<b>Officers that must approve</b>	<b>Name and position</b>	<b>Signature</b>	<b>Date</b>
-----------------------------------	--------------------------	------------------	-------------

<b>this decision</b>			
<b>Head of Strategic Transport on behalf of the Director of Planning and Sustainable Regeneration</b>	<b>Ian Plowright</b>		<b>23/12/21</b>