

Appendix D - Camden Council Equality Impact Assessment

Title of the activity	
Camden Transport Strategy (CTS) Delivery Plan: 2025 - 28	
Officer accountable for the EqIA (e.g. director or project sponsor)	
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Version number and date of update	
Version 1 – 03 October 2024	
Version 2 – 22 October 2024	
Version 3 – 24 October 2024	

1.a Is it a new activity or one that is under review or being changed?

- New
- Under review
- Being changed

1.b. Which groups are affected by this activity?

- Staff
- Residents
- Contractors
- Other (please detail): Camden businesses and visitors

1.c Which Directorate does the activity fall under:

- Supporting People
- Supporting Communities
- Corporate Services
- More than one Directorate. Please specify:

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1.d Outline the aims/objectives/scope of the activity.

In 2019, Camden Council adopted the Camden Transport Strategy (CTS), which presents a vision to transform transport and mobility in the Borough and enable and encourage people to travel sustainably. The CTS commits us to reducing car ownership and use, and motor traffic levels in Camden and delivering an efficient, well-maintained highways network and kerb-side space that prioritises the sustainable movement of goods and people. Every three years, a new Delivery Plan is written to recommend the projects and initiatives that we wish to undertake to help achieve the policies and objectives set out in the CTS.

A comprehensive equalities impact assessment with respect of the nine protected characteristic groups was carried out on the policies and objectives of the CTS and can be viewed [here](#). This EQIA did not include an assessment of the new groups of additional characteristics that are of concern to Camden, and which now form part of our EQIAs. These groups are covered in this assessment.

The process of choosing which projects and initiatives to include in this 3-year CTS Delivery Plan (2025-2028) includes consideration for these policies and objectives alongside other prioritisation criteria including:

- Healthy Streets and CPZ prioritisation*
- Road traffic casualties
- Flood, heat and green space mapping
- Ring-fenced funding
- Stakeholder feedback

*The Healthy Streets prioritisation includes multiple criteria including:

- PTAL (Public Transport Accessibility Level)
- Walking potential
- Cycling potential
- Car ownership
- Road casualties
- Air quality
- Demographics and deprivation

Each project and initiative proposed in the Delivery Plan will be assessed through its own EQIA, assessing the merits and disbenefits of every scheme element against protected characteristics and additional characteristics groups.

Typical schemes and initiatives include:

- Cycling infrastructure (protected cycle lanes, cycle permeability, cycle parking)
- Walking infrastructure (footways, crossings)
- Road safety improvements (junction safety, reducing traffic speeds)
- Healthy Streets (street transformations promoting safety, greening, walking, cycling)
- Liveable Neighbourhoods (through-traffic reduction, safety, public realm changes)
- Electric vehicle charging points (supporting demand and encouraging electric vehicle uptake)
- School initiatives (traffic-reduction, wider pavements school crossings)
- Bus priority (bus network improvements, bus lanes, bus gates, bus stops)

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- Travel behaviour change (education, promotion and offers, active travel training)
- Controlled parking zone reviews (to alter hours of control if current ones are unsuitable)

Step 2: Data and evidence

2.a Consider any relevant data and evidence in relation to all Equality Act protected characteristics:

- Age
- Disability, including family carers²
- Gender reassignment³
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

2 This is the legal term in the Equality Act. In practice there are specific legal protections for a diverse range of people who have physical, mental and sensory impairments, long-term health conditions and/or neurodivergence, as well as carers who provide unpaid care for a friend or family member who cannot function without their support. Census and local datasets use the Equality Act definition and will include people who may not use the language of disability to describe themselves.

3 This is the legal term in the Equality Act. In practice there are specific legal protections for anyone whose gender identity does not match the sex they were assigned at birth. This means, for example, that people who are trans and people who are non-binary or gender fluid are considered a specific protected group under the Equality Act.

Age

Camden has a resident population of approximately 210,100 (2021)¹. The estimates of population are currently in a period of flux as the population base changes from 2011 to 2021, while the intervening years (2012-2020) have to be reassessed to line up with the newly realised mid-year population estimate for 2021.

Almost half of Camden's population (Census 2021) is made up of people aged 25-49 and 72.8% are classified as working age (16-64). Predictions are that people over 65 will make up a larger proportion of Camden's population in the future, so we need to future proof the borough to meet the needs of people over 65, but also ensure that they remain in good health and enjoy independent mobility as they age.

The health of the young and the old are impacted disproportionately from the effects of poor air quality levels as well as fear of road danger and traffic which can result in isolation and exclusion. Poor air quality, including high levels of PM2.5 and NO2, is linked to an increased risk of dementia among people aged 50-79² while increased exposure to air

¹ London Borough of Camden. (2023) [Demographic Databook](#)

² Carey IM, Anderson HR, Atkinson RW, et al. (2018) Are noise and air pollution related to the incidence of dementia? A cohort study in London, England *BMJ Open* 2018;8:e022404. doi: 10.1136/bmjopen-2018-022404

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pollution in older people has been associated with higher mortality rates due to cardio-pulmonary or respiratory causes.³ Poor air quality is also linked to higher risk of asthma (and reduced lung volume and capacity) and impaired cognitive development in children.^{4 5} Children are also disproportionately exposed to high pollution levels on the way to school and during the school day.⁶

Inactivity is also a concern: these age groups are the least active. In Camden, only one in eight 15-year-olds meet the level of weekly physical activity recommended by the UK Government's Chief Medical Officer.⁷ Data from UK GOV reported that 43% of adults aged 40 to 60 years old walk less than 10 minutes continuously each month at a brisk pace. The UK Faculty of Public Health issued a position statement in 2013 on the built environment stating that active travel is the only viable option for significantly increasing physical activity levels across London's population. Furthermore, the significance of this physical activity on mental health has also been brought to light.⁸

Young people in particular have been shown to experience eco-distress related to climate change⁹ while older adults have been shown to experience disproportionate negative health impacts and to be more likely to die because of extreme weather, heatwaves, wildfires and hurricanes.¹⁰ Transport emissions, which the Delivery Plan, if successful, would help to reduce, are contributors to these climate change impacts.

Disability, including family carers

Compared to the London average, there is a higher proportion of people in Camden who identify themselves as being disabled (15.2%, compared to the Greater London average of 13.2%)¹¹. However, the 2011 Census showed that 14.4% of Camden's respondents said they suffered from a long-term illness that limited their daily activities in some form. This is lower than the national figure of 17.9% for long-term illness and is likely to be due to the younger population within Camden compared to the national figure.

The percentage of the population providing 20 hours or more of unpaid care a week has increased from 2.2% to 2.6% since 2001.

³ Simoni, Baldacci, Maio, Cerrai, Sarno and Viegi., (2015). Adverse effects of outdoor pollution in the elderly. *Journal of Thoracic Disease*. 7(1): 34–45.

⁴ Kravitz-Wirtz, Nicole, Samantha Teixeira, Anjum Hajat, Bongki Woo, Kyle Crowder, and David Takeuchi. (2018) Early-Life Air Pollution Exposure, Neighborhood Poverty, and Childhood Asthma in the United States, 1990–2014. *International Journal of Environmental Research and Public Health* 15, no. 6: 1114. <https://doi.org/10.3390/ijerph15061114>

⁵ Sunyer J, Esnaola M, Alvarez-Pedrerol M, Fornas J, Rivas I, López-Vicente M, et al. (2015) Association between Traffic-Related Air Pollution in Schools and Cognitive Development in Primary School Children: A Prospective Cohort Study. *PLoS Med* 12(3): e1001792. doi:10.1371/journal.pmed.1001792

⁶ Queen Mary University, (2018). Helping London's children breathe more easily

⁷ Camden. (2019). [Healthy Streets, Healthy Travel, Healthy Lives: Camden Transport Strategy 2019-2041](#)

⁸ Mitchell, R. Is physical activity in natural environments better for mental health than physical activity on other environments? *Social Science & Medicine* (2013)

⁹ Royal College of Paediatrics and Child Health, (n.d.). Health inequalities and climate change tool

¹⁰ Nguyen, E., (2022) Studying the impact of climate change on older adult health and well-being. National Institute on Aging

¹¹ London Borough of Camden, (2023). [2021 Census Topic Summary Health, Disability & Unpaid Care.](#)

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Gender reassignment

Data on gender reassignment figures is not available at a borough level, however a study by the Gender Reassignment Education and Research Study funded by the Home Office found that there is an estimated number of 300,000 to 500,000 transgender people within the UK. A survey¹² undertaken by the government confirmed that respondents within that category most feared for their safety on the streets and using public transport.

Marriage and civil partnership

N/A – no relevant data applicable for this assessment and there is no evidence to suggest that this Delivery Plan would have a disproportionate negative or positive impact on this characteristic

Pregnancy and maternity

In the year to mid-2021, there were 2,266 births to Camden-resident mothers. Since 2011-12, annual births in Camden have reduced by -27%. While this is part of a wider national (-16%) and London (-18%) trend, Camden has seen the 6th largest fall in birth over the last decade in London.¹³

Air pollution, particularly of particulate matter, affects maternal health, including increasing the risk of pre-eclampsia (a serious cardiovascular condition of pregnancy), as well as impacts the health of the child, including low birth weight.¹⁴ If the Delivery Plan proposals succeed in their intended aim of improving air quality and improving road safety (through reduced motor vehicle levels), this could have a positive impact on parents by improving the health and safety of their children.

Race

Black Asian Minority Ethnic (BAME) people made up 40.5% of Camden's population in 2021, an increase from 31% since 2011¹⁵. Walking is the most commonly used form of transport for BAME Londoners, with taking the bus the second most commonly used transport mode. BAME Londoners walk and use the bus at higher rates than white Londoners.¹⁶ However, BAME residents are disproportionately affected by the impacts of road pollution, including noise pollution, air pollution and road danger.^{17 18}

Religion or belief

According to 2021 Census data, the most common religion in Camden is Christianity, with 31.4% of the borough identifying as Christian. Another 16.1% identified as Muslim while 4.8% of people identified as Jewish. 34.6% of residents do not have a religion. Camden is home to various places of worships and the Council recognises that being able to access these places is important across all religions.

¹² Home Office, (2011). [Headline findings from Transgender E-surveys](#)

¹³ London Borough of Camden. (2023) [Demographic Databook](#)

¹⁴ Royal College of Obstetricians & Gynaecologists, (16 June 2022). [UK Government must stop ignoring impact of air pollution in pregnancy and set air quality targets which protect the health of future generations](#)

Mitku, A.A., Zewotir, T., North, D. *et al*, (2023). Impact of ambient air pollution exposure during pregnancy on adverse birth outcomes: generalized structural equation modeling approach. *BMC Public Health* **23**, 45. <https://doi.org/10.1186/s12889-022-14971-3>

¹⁵ London Borough of Camden, (2023). [Camden Profile](#).

¹⁶ Transport for London, (2019). [Travel in London: Understanding our diverse communities 2019](#).

¹⁷ Camden, (2019). [Healthy Streets, Healthy Travel, Healthy Lives: Camden Transport Strategy 2019-2041](#)

¹⁸ Logika Noise Air Quality, (2021). [Air Pollution and Inequalities in London: 2019 Update](#).

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Sex

Slightly over half of Camden's population is female at 51%, this is almost identical to Greater London as well as the UK. According to data for London (Camden specific data is not available) most trips made by women are on foot, around 35%, compared to men at just under 30%. Around 27% of men's trips are driven compared to 20% for women, although women are more likely to be passengers at approximately 15% of their trips compared to 10% for men. However, in total the majority of trips taken by both sexes are using modes other than private vehicles. Around 85% of Camden residents trips, overall, are made by non-car modes.

Sexual orientation

Under reporting on the size of lesbian, gay and bisexual communities is a recognised issue so it is difficult to accurately understand the size of this proportion of the population, particularly at borough level. An upper estimate for London suggests that roughly 10% of the population is lesbian, gay or bisexual although these figures may underrepresent the size of this population due to societal issues surrounding the disclosure of sexual orientation. Like women and people who are going or have gone through gender reassignment, members of the LGBT community often find safety and security issues as a concern on public transport.

Intersectional Groups

Intersectional groups identified are older disabled people and low-income BAME people. The information covering these groups is included in the Age, Race, Low-Income Households, and Disability sections.

2.b Consider evidence in relation to the additional characteristics that the Council is concerned about:

- Foster carers
- Looked after children/care leavers
- Low-income households
- Refugees and asylum seekers
- Parents (of any gender, with children aged under 18)
- People who are homeless
- Private rental tenants in deprived areas
- Single parent households
- Social housing tenants
- Any other, please specify

Foster carers

N/A – no relevant data applicable for this assessment and there is no evidence to suggest that this Delivery Plan would have a disproportionate negative or positive impact on this characteristic.

Looked after children/care leavers

N/A – no relevant data applicable for this assessment and there is no evidence to suggest that this Delivery Plan would have a disproportionate negative or positive impact on this

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characteristic.
Low-income households 13% of Camden households have an annual median income of less than £20,000 ¹⁹ . As of 2019, 14.1% of the Camden population were income deprived, meaning they were either out of work or in work but had low earnings. Walking is the most commonly used type of transport by Londoners with low incomes (93 per cent walk at least once a week) in line with all Londoners (95 per cent). The bus is the next most common type of transport used by Londoners on lower incomes (69 per cent use the bus at least once a week, compared with 59 per cent of all Londoners). ²⁰ Accommodation is often cheaper ²¹ on main roads as it is less desirable for multiple reasons including noise and pollution, and lower income families have a higher propensity to live on them. Lower income families may therefore be more affected by noise and pollution generated by vehicular traffic.
Refugees and asylum seekers N/A - no relevant data applicable for this assessment. The main impacts identified by this assessment was in conjunction to potential intersections with low-income.
Parents (of any gender, with children aged under 18) According to 2021 Census data, Camden had 21,067 households with dependent children, representing 23% of all households in Camden. If the proposals contained in this Delivery Plan succeed in their intended aim of improving air quality and improving road safety (through reduced motor vehicle levels), this could have a positive impact on parents by improving the health and safety of their children.
People who are homeless Data provided by the Combined Homelessness and Information Network ²² estimates that the number of people seen rough sleeping in Camden for 2022/23 was 719, up from 666 in 2021/22. As people who are homeless spend a larger amount of time on streets, they are impacted by changes to traffic levels and air pollution, and road safety – all issues which this Delivery Plan aims to contribute towards improving.
Private rental tenants in deprived areas N/A - no relevant data applicable for this assessment. The main impacts identified by this assessment was in conjunction to potential intersections with low-income.
Single parent households N/A - no relevant data applicable for this assessment. The main impacts identified by this assessment was in conjunction to potential intersections with low-income.

¹⁹ CACI. (2022). [Paycheck equivalised household income 2022](#).

²⁰ Transport for London, (2019). [Travel in London: Understanding our diverse communities 2019](#).

²¹ Fuller & Brugge, (2020)

²² Greater London Authority, (2023). [Rough Sleeping in London \(CHAIN Reports\)](#).

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Social housing tenants

N/A - no relevant data applicable for this assessment. The main impacts identified by this assessment was in conjunction to potential intersections with low-income.

Any other, please specify

N/A - no relevant data applicable for this assessment.

2.c Have you found any data or evidence about intersectionality. This could be statistically significant data on disproportionality or evidence of disadvantage or discrimination for people who have a combination, or intersection, of two or more characteristics.

An intersectional group identified is disabled people in low-income households. Evidence from the Equality and Human Rights Commission find that households with a disabled person or people have higher levels of relative poverty than households with no disabled people.²³ More generally, people who share the demographics of more than one protected and additional characteristic group are more likely to have lower-incomes or be in debt and experience problems related to these.²⁴ As people on lower incomes are more likely to live on main roads, where accommodation costs are cheaper than, the impact of poor air quality, increased traffic noise and road safety risk on main roads could therefore disproportionately impact disabled people.

A further intersectional group identified is elderly disabled people. Older people are more likely to have acquired disabilities relating to the aging process. Restrictions on car lifts or taxi use in traffic restricted areas (such as Healthy School Streets) could therefore disproportionately impact some people, particularly those with mobility, sensory and cognitive impairments.

Step 3: Impact

3.a Potential negative impact on protected characteristics

Protected Characteristic	Potential negative impact?	Explain the potential negative impact
Age	Yes	A comment received in the engagement raised concern about school street traffic restrictions causing difficulties for older people reliant on lift in cars and/or taxis for getting to appointments. Whilst Camden Council allows for private cars (registered to a home address within the restricted zone) to enter and leave a school street during hours of operation, it does not generally allow taxis or helpers (registered to other addresses) to enter the zone. This restriction on car use may negatively impact older people that do not have access to a car registered to their address but need

²³ Equalities and Human Rights Commission, (2022). Low income and debt problems inquiry.

²⁴ Equalities and Human Rights Commission, (2022). Low income and debt problems inquiry

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Protected Characteristic	Potential negative impact?	Explain the potential negative impact
		<p>vehicular transport at specific times of day.</p> <p>The lack of step-free access to Underground and rail networks in the borough limits the ability for elderly people to use these modes of transport. Along with Camden's limited ability to influence the removal of these barriers, the Delivery Plan may be insufficient in providing step-free access for its elderly population.</p> <p>Feedback from some previous schemes includes comments from elderly people feeling less safe within Safe & Healthy Street schemes, with a reduction in the sense of surveillance by the presence of motorised traffic.</p>
Disability including carers	Yes	<p>The lack of step-free access and frequent breakdowns in existing lifts to Underground and rail networks in the borough limits the ability for disabled people to use these modes of transport. Along with Camden's limited ability to influence the removal of these barriers, the Delivery Plan may be insufficient in providing step-free access for its disabled population.</p> <p>Feedback from some previous schemes includes comments from disabled people (and their carers) that area-wide Safe and Healthy Street schemes negatively impact them, with journeys taking longer in some directions, particularly when they are reliant on car travel.</p> <p>The redesign of bus stops within cycling schemes (creating floating island stops and bus boarders) increases barriers for disabled people using the buses, and limits their ability to use this largely step-free public transport option.</p>
Gender reassignment	No	N/A - Officers do not consider that the proposed changes would have any negative impact on gender reassignment.
Marriage/civil partnership	No	N/A - Officers do not consider that the proposed changes would have any negative impact on marriage/civil partnership.
Pregnancy/maternity	No	N/A - Officers do not consider that the proposed changes would have any negative impact on pregnancy or maternity.
Race	No	N/A - Officers do not consider that the proposed changes would have any negative impact on race.
Religion or belief	Yes	Feedback from some previous schemes includes comments from some religious groups, feeling that area-wide traffic schemes and parking changes negatively impact their congregation in being

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Protected Characteristic	Potential negative impact?	Explain the potential negative impact
		able to access their religious buildings, due to longer journeys in some directions and inability to park close by.
Sex	Yes	Feedback from some previous schemes includes comments from women feeling less safe within Safe & Healthy Street schemes, with a reduction in the sense of surveillance by the presence of motorised traffic.
Sexual orientation	No	N/A - Officers do not consider that the proposed changes would have any negative impact on sexual orientation.

3.b Potential positive impact on protected characteristics

Protected Characteristic	Potential positive impact?	Explain the potential positive impact
Age	Yes	<p>An increase in activity, including walking and cycling, benefits children in terms of reducing childhood obesity, especially given that data shows higher car ownership is linked to lower levels of physical activity. In Camden, only one in eight 15-year-olds meet the required level of weekly physical activity recommended by the UK Government's Chief Medical Officer.²⁵ Reducing road danger, by reducing the volume of motor vehicle traffic, can help facilitate independent travel for children and young people, which is crucial to healthy child development and help young people meet the recommended level of physical activity.</p> <p>Air pollution from motor vehicles has a significant impact on younger people who are closer to the vehicle exhaust level and who have lungs that are still developing. According to the European Environment Agency (EEA)²⁶, this impact can result in significant health complications later in life impacting their life expectancy and quality of life. Older adults are also known to be particularly sensitive to air pollution. One of the main objectives of the FSAP is a reduction in motor vehicle usage and emission-based charging which would, if approved, contribute to improving air quality in Camden.</p>

²⁵ Hambleton, Mark. (25 August 2023). [Parents' safety warning, as 1 in 10 cyclist casualties under the age of 16.](#)

²⁶ European Environment Agency, (2023). [Air pollution and children's health.](#)

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Protected Characteristic	Potential positive impact?	Explain the potential positive impact
		<p>Disabled children, including those with mobility impairments, and older people, who have higher instances of conditions such as mobility impairment, deafness or blindness, would potentially benefit from reduced traffic and road danger arising from lower motor vehicle usage. In addition, older people are also more likely to live with dementia and may benefit from reduced noise pollution. Those older people who can increase their active travel may see benefits to their mobility and physical and mental health.</p> <p>Providing safer cycling conditions, by reducing the volume and dominance of motor vehicles, and creating separated cycling facilities, can increase the propensity of children and older people to cycle, thereby improving their mental and physical health, independent mobility, social inclusion and improved access to opportunities.</p>
Disability including carers	Yes	<p>The reliance on cars by disabled people is often overstated with only 3% of the disabled population of Camden reliant on cars for their primary form of transport. Developing a range of attractive, convenient and safe alternatives to private cars will provide a benefit to all groups through making alternative options more widely available and inclusive as well as freeing up valuable space on the road and the public transport network for protected groups who have greater need, including disabled people.</p> <p>Public transport, and more specifically the bus network, is of critical importance to disabled people, with 4% more trips by bus amongst people with at least one long-term health issue or disability²⁷. Focusing on improvements to the bus network, staff training and bus infrastructure will positively enhance the mobility and freedom of disabled people.</p> <p>Reducing motor vehicle usage and encouraging a shift to active forms of travel can increase the propensity of disabled people to cycle (including the use of adapted cycles), thereby helping improve mental and physical health, supporting independent mobility, social inclusion and improved access to opportunities.</p>
Gender reassignment	No	<p>Officers do not consider that the Delivery Plan would have any specific positive impact on gender reassignment, other than in encouraging more people to walk in the streets and use public transport which in turn increases passive surveillance and improves feelings of personal safety.</p>

²⁷ National Travel Survey 2023.

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Protected Characteristic	Potential positive impact?	Explain the potential positive impact
Marriage/civil partnership	No	Officers do not consider that the proposed changes would have any specific positive impact on marriage/civil partnership.
Pregnancy/maternity	Yes	Reduced motor vehicle usage, which is an outcome that this project intends to contribute towards, would result in lower volumes of traffic which would create a less stressful environment, reduce air pollution (especially particulate matter that increases the risk of pre-eclampsia), as well as improved average birth weight, which in turn affects child growth and development.
Race	Yes	<p>As Black and Minority Ethnic (BME) residents are less likely to drive and more likely to rely on walking, and public transport, this protected characteristic group may benefit from reduced motor vehicle trips, more pedestrian crossings and improved public transport reliability.</p> <p>Whilst BME residents used to be less likely to cycle than other residents, there has been a notable increase in cycling in these groups such that BME people are just as likely to cycle in London today as white Londoners²⁸. The introduction of protected cycle lanes and other cycling related infrastructure continues to help realise this growth.</p> <p>Low-income and BAME individuals are the two groups most exposed to poor air pollution in London. Therefore, BAME residents (and particularly low-income BAME residents) would benefit from fewer high emitting vehicles and less traffic pollution.</p>
Religion or belief	No	Officers do not consider that the proposed changes would have any specific positive impact on religion or belief.
Sex	Yes	<p>Women - who are more likely than men to be moving through public space with pushchairs and prams, and expectant mothers and mothers with young children - may also particularly benefit from improved road safety, wider pavements, better pedestrian crossings and improved air quality, particularly when walking.</p> <p>In London, women are less represented than men in cycling, and lack of safe cycle infrastructure disproportionately impacts women, attributable in part to a more risk averse attitude to</p>

²⁸ 2CV (2021). Cycling potential in London's diverse communities

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Protected Characteristic	Potential positive impact?	Explain the potential positive impact
		<p>mixing with traffic and to women experiencing higher rates of aggression and near miss incidents while cycling than men²⁹. Research has shown that women particularly value protected cycle facilities and direct routes such as cycleways. Reduced motor vehicle usage and extending Camden's cycle infrastructure may benefit and empower more women to cycle.</p> <p>With personal safety in public places being a concern for women, measures to increase walking and cycling will improve passive surveillance of streets and neighbourhoods and increase public safety³⁰.</p>
Sexual orientation	No	With personal safety in public places being a concern for the LGBT+ community, measures to increase walking and cycling will improve passive surveillance of streets and neighbourhoods and increase public safety.

3.c Potential negative impact on other characteristics

Characteristic	Potential negative impact?	Explain the potential negative impact
Foster carers	No	N/A – Officers do not consider there to be any negative impacts on foster carers.
Looked after children/care leavers	No	N/A – Officers do not consider there to be any negative impacts on looked after children/care leavers.
Low-income households	No	Low-income households are more likely to live on main roads where accommodation is often cheaper. Schemes that restrict vehicular access to adjacent neighbourhoods could in some cases increase the traffic (and associated disbenefits such as noise and air pollution) disproportionately for people on lower incomes living on main roads.
Refugees and asylum seekers	No	N/A - Officers do not consider there to be any negative impacts on refugees and asylum seekers.

²⁹ Aldred, Rachel and Sian Crossweller, (2015). Investigating the rates and impacts of near misses and related incidents among UK cyclists. *Journal of Transport & Health* 2(3), 379-393.

³⁰ Aldred, Rachel and Anna Goodman (2021). [The Impact of Introducing a Low Traffic Neighbourhood on Street Crime, in Waltham Forest, London](#)

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Parents (of any gender, with children aged under 18)	No	N/A - Officers do not consider there to be any negative impacts on parents.
People who are homeless	No	N/A - Officers do not consider there to be any negative impacts on people who are homeless.
Private rental tenants in deprived areas	No	N/A - Officers do not consider there to be any negative impacts on private rental tenants in deprived areas.
Single parent households	No	N/A - Officers do not consider there to be any negative impacts on single parent households.
Single parent households	No	N/A - Officers do not consider there to be any negative impacts on single parent households.
Social housing tenants	No	N/A - Officers do not consider there to be any negative impacts on social housing tenants.
Any other, please specify	No	N/A

3.d Potential positive impact on other characteristics

Characteristic	Potential positive impact?	Explain the potential positive impact
Foster carers	No	Officers do not consider that the proposed changes would have any specific positive impact on foster carers.
Looked after children/care leavers	No	Officers do not consider that the proposed changes would have any specific positive impact on looked after children/care leavers.
Low-income households	Yes	Households with a lower income are less likely to own a car and will therefore be more reliant on walking, cycling, public transport and car clubs, with forced car ownership shown to cause economic stress ³¹ . Infrastructure and behaviour change schemes designed to increase the safety and convenience of these modes will benefit lower income households.

³¹ Lucas, Karen, Gordon Stokes, Jeroen Bastiaanssen and Julian Burkinshaw (March 2019). [Inequalities in mobilities and access in the UK transport system](#).

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		<p>People who are on low incomes, who have greater exposure to air pollution³², would benefit from improved air quality, and associated health impacts, as the use of high emitting vehicles decreases.</p> <p>In Camden, low-income households also have greater exposure to climate risk and would benefit from reduced greenhouse gas emissions from transport³³.</p> <p>Potential benefits of improved air quality, reduced carbon emissions, reduced motor vehicle dominance and increased uptake of sustainable/healthy modes of travel for low-income groups could include potential improvements to mental and physical health, independent mobility, social inclusion and improved access to amenities, services, and opportunities.</p>
Refugees and asylum seekers	No	Officers do not consider that the proposed changes would have any specific positive impact on refugees and asylum seekers.
Parents (of any gender, with children aged under 18)	Yes	The potential positive outcomes from the proposals – improved air quality, reduced carbon emissions, reduced motor vehicle dominance and increased uptake of sustainable/healthy modes of travel, could have a beneficial impact for all parents in the Borough. This includes potential improvements to mental and physical health, independent mobility, social inclusion and improved access to amenities, services, and opportunities.
People who are homeless	Yes	People who are homeless are likely to spend a large amount of time on the streets and therefore have greater exposure to traffic-related pollution and road traffic danger. As such, people who are homeless may be positively affected by the air quality and road safety improvements that could result from these proposals. People who are homeless may also be particularly impacted by climate risk in the Borough (heat and flooding) and therefore measures to reduce carbon emissions from road transport may be beneficial.

³² Mayor of London, (12 October 2021). [Air Pollution and Inequalities in London: 2019 Update](#)

³³ Greater London Authority and Bloomberg Associates, (2023). [Climate Risk Mapping](#).

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Private rental tenants in deprived areas	No	Private rental tenants in deprived areas who have greater exposure to air pollution ³⁴ , would benefit from improved air quality, and associated health impacts, as the use of high emitting vehicles decreases. In Camden, low-income households also have greater exposure to climate risk and would benefit from reduced greenhouse gas emissions from transport ³⁵ . Potential benefits of improved air quality, reduced carbon emissions, reduced motor vehicle dominance and increased uptake of sustainable/healthy modes of travel for low-income groups could include potential improvements to mental and physical health, independent mobility, social inclusion and improved access to amenities, services, and opportunities.
Single parent households	No	Officers do not consider that the proposed changes would have any specific positive impact on single parent households.
Social housing tenants	No	Officers do not consider that the proposed changes would have any specific positive impact on social housing tenants.
Any other, please specify	No	N/A

3.e Consider intersectionality.⁴ Given the evidence listed in step 2, consider and describe any potential **positive and negative impacts** this activity could have on people who have a **combination, or intersection, of two or more characteristics**. For example, people who are young, trans and homeless, disabled people on low incomes, or Asian women.

As listed in 2.c - low-income households and disability, and older people and disability.

As people on lower incomes are more likely to live on main roads, where accommodation costs are cheaper, and the negative impacts of living on main roads could therefore disproportionately impact those with disabilities.

As older people are more likely to have acquired disabilities relating to the aging process, restrictions on car lifts or taxi use in traffic restricted areas (such as Healthy School Streets) could therefore disproportionately negatively impact disabled people.

⁴ Intersectionality refers to the interconnected nature of social categorisations such as race, class, and gender as they apply to a given individual or group, regarded as creating overlapping and interdependent systems of discrimination or disadvantage.

³⁴ Mayor of London, (12 October 2021). [Air Pollution and Inequalities in London: 2019 Update](#)

³⁵ Greater London Authority and Bloomberg Associates, (2023). [Climate Risk Mapping](#).

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Step 4: Engagement - co-production, involvement or consultation with those affected

4.a How have the opinions of people potentially affected by the activity, or those of organisations representing them, informed your work?

List the groups you intend to engage and reference any previous relevant activities, including relevant formal consultation? ⁵	If engagement has taken place, what issues were raised in relation to one or more of the protected characteristics or the other characteristics about which the Council takes an interest, including multiple or intersecting impacts for people who have two or more of the relevant characteristics?
All Camden residents and visitors	<p>In the engagement period, comments were received from residents mentioning protected characteristics or other characteristics of interest on the following topics:</p> <ul style="list-style-type: none"> • Public transport infrastructure needing to be good enough for trips by older people • Pavements feeling more dangerous for an older person, sharing with electric bicycles, scooters and skateboards • Healthy and wellbeing strategy not mentioning older residents unable to walk or cycle. • Healthy School Streets making it difficult for older people reliant on cars/taxis to get to appointments.
Stakeholder and community groups	<p>In the engagement period, comments were received from stakeholder and community groups mentioning protected characteristics or other characteristics of interest on the following topic:</p> <ul style="list-style-type: none"> • Concern regarding the personal safety of older women and children walking who are disincentivised to walk at night in Safe & Healthy neighbourhoods with reduced motor traffic.
Disability Groups	<p>In the engagement period, the Delivery Plan was presented to the Disability Oversight Panel public engagement session attended by 20 disabled residents. Comments gathered on the night included the following key topics:</p> <ul style="list-style-type: none"> - Whether disability should be explicitly mentioned in objectives of CTS (instead of included in broader terms considering inclusion of all protected characteristics) - Develop channel for earlier input from disabled people into proposals and designs such as creating a working group or disability forum - Increasing the voice of disabled people (in their own words) in lobbying TfL on slow progress of step-free access to public transport and other problems on TfL networks such as lifts broken - Increasing role of Council in lobbying TfL for step-free public transport, better training of PT staff (such as bus drivers) - Provision for charging mobility scooters in Council-owned housing - Increasing unreliability of Dial-A-Ride service - Concern regarding design of bus stop floating islands and bus

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	<p>boarders causing fright to disabled people and making journey from bus shelter to bus too long.</p> <ul style="list-style-type: none"> - Challenge to make EVCPs (electric vehicle charging points) accessible - Focus on uneven pavements, obstructions from dockless bikes and A-boards
Businesses and BIDs	In the engagement period, no comments from businesses or BIDs were received mentioning protected characteristics or other characteristics of interest.
Emergency Services	In the engagement period, no comments from emergency services were received in relation to protected characteristics or other characteristics of interest.

5 This could include our staff networks, advisory groups and local community groups, advice agencies and charities.

b. Where relevant, record any engagement you have had with other teams or directorates within the Council and/or with external partners or suppliers that you are working with to deliver this activity. This is essential where the mitigations for any potential negative impacts rely on the delivery of work by other teams.

Engagement with the following internal teams took place:

Parking Team; Planning & Regeneration Team; Recreation, Community Safety and Physical Activity Teams; Sustainability Team; Camden Accessible Transport Services team, Inclusive Economy Team; Public Health Team; Environmental Services Team; Highways, Implementation and Structures Teams; Euston Regeneration and HS2 Program Delivery Team; Green Space Development Team; Community Investment Programme Team.

Step 5: Informed decision-making

4. Having assessed the potential positive and/or negative impact of the activity, what do you propose to do next?

Options	
Change the activity to mitigate potential negative impacts identified and/or to include additional positive impacts that can address disproportionality or otherwise promote equality or good relations.	
Continue the work as it is because no potential negative impacts have been found	
Justify and continue the work despite negative impacts (please provide justification – this must be a proportionate means of achieving a legitimate aim)	X

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Stop the work because discrimination is unjustifiable and there is no obvious way to mitigate the negative impact

Rationale

The potential wider beneficial impacts of the activity (the 3-year CTS Delivery Plan 2025-2028), which include reduced motor vehicle dominance/congestion, reduced carbon emissions and improved air quality, and increased uptake of sustainable/healthy modes of travel and more efficient use of kerbside space, are considered to outweigh potential negative impacts of the Delivery Plan. Where negative impacts are identified, scheme by scheme EQIAs and consultation reports also identify mitigations (also see section 6 of this EQIA). Collectively, the schemes move Camden closer to achieving its ambitious sustainable transport, climate change, air quality, road safety and public health policy objectives and its vision of creating a healthy place for people to work, live and visit.

Whilst there may be a concern that on some occasions Safe & Healthy Street schemes may increase traffic, at certain times, on some main roads (which may in turn affect any low-income households adjacent to the road), studies³⁶ have shown that low traffic neighbourhoods have the effect of reducing car use and miles driven, leading to a 'no change' impact in median motor vehicles on boundary roads. [Monitoring reports](#) undertaken for various Safe & Healthy Streets, through-traffic reduction in schemes in Camden have shown a similar effect and/or on some boundary roads a decrease in traffic levels. At the same time, low traffic neighbourhood schemes have a significant positive impact in many other ways for a low-income household including better, cheaper travel options, safety, air quality and lower crime levels.

In Camden, the current vehicular exemptions operating around Healthy School Streets do not allow for exemptions for professional or personal taxis (friend pick-ups), to maintain the integrity of the scheme and reduce the risk of abuse of the system. Whilst there may be occasions when additional exemptions to those already offered (see <https://www.camden.gov.uk/healthy-school-streets>) are viewed as necessary by some groups, this is balanced against the commitment to improving the safety of children attending the school, encouraging active travel by all, and improving air quality in the neighbourhood. Nevertheless, recognising this concern, a specific action has been added to Section 6 to review this further moving forwards.

Despite acknowledging the limited influence that the Council has on Transport for London operations and decisions, it is recognised that Council must increase efforts to lobby TfL in funding step-free access for stations in Camden, increasing real-time public information (e.g. for broken lifts), and better staff training (e.g. bus pull-up at stops).

The Council planning to work with external agencies including Motability to improve the accessibility of new EVCP charge points.

The redesign of bus stops within cycle schemes (creating bus stop bypasses and bus boarders) are compliant with the Department for Transport LTN 1/20 guidance, with individual schemes also subject to road safety audits and targeted equality impact assessments. The potential risk of conflicts between bus users and cyclists is carefully considered in each case,

³⁶ Transport for London, (February 2024). [The impacts of low traffic neighbourhoods in London](#).

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balancing with the potential benefits to reducing risks for cyclists and thereby creating a safer and more comfortable environment for those statistically less likely to cycle, including for older, younger, and disabled people. The Council has introduced Bus Stop Bypasses in many locations across the borough with some of them in situ for more than a decade with no collisions recorded. Officers conduct ongoing monitoring through on-site cameras and independent video conflict surveys and are working with TfL to fit buses serving affected routes with on-board announcements to advise passengers alighting of the potential presence of cyclists.

Step 6: Action planning

5. You must address any negative impacts identified in steps 3 and/or 4. Please demonstrate how you will do this or record any actions already taken to do this.

Action	Due	Owner
Undertake further EQIAs on each scheme and initiative resulting from the adoption of the Delivery Plan to understand the impact of the work on protected and other characteristics, at a more granular level.	Development of all significant schemes in the Delivery Plan	Project Managers
To combat increased personal safety concerns associated with S&HS (Safe & Healthy Street) schemes, ensure that individual schemes consider, and budget for, improvements to lighting and street frontage activation to improve passive surveillance. Consider the lessons learned from the forthcoming Women Safety in the Public Realm report to help inform future scheme design. Collect relevant crime data as part of scheme monitoring.	Development of S&HS schemes in the Delivery Plan	Project Managers
Investigate mechanisms for taxi / friend-lift exemptions for residents living in the time-restricted zones (Healthy School Streets) who may, due to age or disability or other, need to access a taxi during restricted times and are unable to walk/wheel to/from the edge of the zone.	Within first year of Delivery Plan	Jacqueline Saunders
Continue to lobby TfL and central Government for a) enhanced step-free access provision to rail and Underground stations in Camden, b) improved staff training on bus, train and Underground network to the needs of disabled people when using public transport.	Ongoing	Transport & Travel Planning Team
To mitigate the concerns regarding longer vehicular journeys (in some directions) resulting from through-traffic reduction schemes, increase the availability of alternative transport options, including additional shared transport provision (e.g. Dockless bikes, Santander bikes, community cargo bikes, e-scooters, car clubs) and training (e.g. cycle and cargo bike	Ongoing	Project Managers; Transport and Travel Planning Team

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training). Improve wayfinding and promotion of public transport facilities in collaboration with TfL.		
Undertake Accessibility audits on relevant schemes and increase collaboration with Camden Disability Action / Access Able, and disabled people more generally, to ensure that changes to Camden's streets are inclusive and considerate of all ages and abilities.	Development of all significant schemes in the Delivery Plan	Project Managers

Step 7: EqIA Advisor

Ask a colleague, preferably in another team or directorate, to 'sense check' your approach to the EqIA and ask them to review the EqIA form before completing it.

They should be able to clearly understand from what you have recorded here the process you have undertaken to assess the equality impacts, what your analysis tells you about positive and negative actual or potential impact, and what decisions you have made and actions you have identified as a result.

They may make suggestions for evidence or impacts that you have not identified. If this happens, you should consider revising the EqIA form before completing this version and setting a date for its review.

If you feel you could benefit from further advice, please contact the Equalities service at equalities@camden.gov.uk

Step 8: Sign-off

EqIA author	Name: Katie Dickson Job title: Principal Transport Planner Date: 22 October 2024
EqIA reviewer	Name: Marth Daniels Job title: Equality Impact Quality Assurance Team Date: 22 October 2024
EqIA advisor	Name: Brenda Busingye Job title: Transport & Travel Planning Team Manager Date: 22 October 2024
Senior accountable officer	Name: Sam Margolis Job title: Head of Transport Strategy & Projects Date: 24 October 2024