

Equality Impact Assessment (EqIA) for London Plan Guidance

London Plan Guidance:	Sustainable Transport, Walking and Cycling
Teams involved:	London Plan Team and TfL London Plan and Planning Obligations Team
Date:	December 2022

1. Please provide an outline of the guidance, who it is aimed at and any key issues to be aware of.

The Sustainable Transport, Walking and Cycling London Plan Guidance (LPG) provides further information on how to apply London Plan Policies T3 Transport Capacity, Connectivity and Safeguarding, and T2 Healthy Streets, as well as SI 1 Improving Air Quality. The LPG provides guidance on how local planning authorities' Local Plans should ensure that walking and cycling is supported, in line with the Healthy Streets Approach, and identify land requirements that will support enhanced public transport connectivity and capacity; deliver improvements to air quality and safeguard the air quality benefits resulting from the Mayor's or boroughs' activities; and how relevant applications should support the provision of space for walking, cycling and public transport. The LPG replaces elements of the Land for Industry and Transport Supplementary Planning Guidance, which was revoked along with the publication of the London Plan in 2021.

2. Which of the Public Sector Equality Duty aims are relevant to the guidance and the impacts identified?

Eliminate unlawful discrimination, harassment and victimisation and any other conduct that is unlawful under the Equality Act 2010.
Advance equality of opportunity between people who share a protected characteristic and those who do not.

Assessment

List aspects of the guidance that might affect particular groups

Guidance key aspects, chapter headings, theme etc	Particular group that could be affected
Walking	Younger people, people on lower incomes, people with caring responsibilities, parents and pregnant people, older people and people with disabilities
Cycling	Younger people, people with caring responsibilities, people on lower incomes, older people and people with disabilities
Buses	People on lower incomes, people with caring responsibilities, parents and pregnant people, older people, younger people and people with disabilities
Rail and trams	People with disabilities, parents and pregnant people, younger people, people on lower incomes, people with caring responsibilities and older people
Car parks and other surplus transport land	People with disabilities, parents and pregnant people, people with caring responsibilities, younger people and older people

* It should be noted that the general policy requirement and principles are already required through the London Plan. This LPG is providing further detail on how the policies should be implemented, and is therefore further amplifying the effects.

Equality impacts, mitigating actions and justification (where applicable)

Group	Potential impact description	Relevant PSED aim (1; 2a, b or c; and/or 3)	Actions identified and/or justification	Assessment of equality impacts
Age (consider particularly children, under-21s and over-65s)	<p>Positive</p> <p>Through safeguarding land for transport improvements, the LPG will support the transport network in London to expand and deliver more services and a wider network of active travel modes, as well as buses, rail and trams. This has the potential to give more access to different types of travel options. This, in turn, will provide more options for older people who encounter a range of barriers to using public and active travel modes in London; and provide more safe routes for younger people.</p> <p>Good-quality cycle and walking infrastructure provides safer spaces for older and younger people, enabling them to feel comfortable using active travel modes. It also supports the increasing shift to more sustainable modes of travel; and helps to improve air quality, which particularly impacts older and younger people.</p>	1, 2a and 2c	No further actions identified	+2

<p>Disability (consider different types of physical, learning or mental disabilities)</p>	<p>Positive The LPG’s approach to safeguarding land will enable London to continue to develop a transport network to serve all residents. Expansion will enable the offer of a wider range of travel options; new lines with more step free access,, such as the Elizabeth line; better level access to trains; and increased bus infrastructure, which can provide more route options in closer proximity to areas of housing that may better suit disabled people. Increased availability, and improved quality, of cycle and walking infrastructure has the potential to improve the mobility options for those who rely on non-standard cycles and mobility scooters. An increased shift towards sustainable transport modes and improved air quality has the potential to benefit disabled people who are adversely affected by poor air quality.</p> <p>Negative The potential for redevelopment of car parking could impact on the ability of people with physical disabilities who rely on cars to move around the city.</p>	<p>2a and 2c</p>	<p>As part of the engagement undertaken during the consultation, work was undertaken to engage with a range of people, including people with different disabilities, to ensure that the document was inclusive and supported the needs of all transport users. Data shows that organisations such as Hackney Disability BackUp and Transport for All took part in the consultation.</p> <p>London Plan Policies T6.1 and T6.5 set out requirements around disabled persons’ parking spaces that development must observe which should mitigate the impact on those with physical disabilities.</p>	<p>+1</p>
<p>Gender reassignment</p>	<p>No specific impacts.</p>	<p>N/A</p>	<p>N/A</p>	<p>0</p>

Marriage and civil partnership	No specific impacts.	N/A	N/A	0
Pregnancy and maternity	Positive Safeguarding transport land to deliver expanded and more accessible transport networks, and increased walking and cycling capacity, will continue to give pregnant people (and those with very small children) an expanded range of travel options, providing better, more accessible and safer choices in making the most of active travel modes and public transport.	2a and 2c	No further actions identified	+1
Race or ethnicity (consider refugees, asylum seekers, migrants, gypsies and travellers)	Positive Evidence shows that bus travel is particularly common among Black, Asian and Minority Ethnic Londoners on lower incomes; and that Black, Asian and Minority Ethnic Londoners have concerns in relation to safety when accessing transport, and using walking and cycling routes. Safeguarding and supporting future bus infrastructure will provide better connections for bus users, with increased walking and cycling networks providing better and potentially safer options for active travel.	1	No further actions identified	+2
Religion or belief	No specific impacts	N/A	N/A	0

Sex	<p>Positive Safeguarding land for the expansion of London's transport network; and ensuring the identification, safeguarding and development of increased infrastructure to support walking and cycling, will potentially benefit women, who are more likely than men to undertake more complex trip chains during the day. This is because women often have more caring responsibilities for children and older relatives. These new routes may give more options, and make the shorter but more frequent trips that women make on public transport quicker and more convenient. Ensuring the delivery of specific walking and cycling networks may also improve safety, giving women more options when moving around the city.</p> <p>Negative The removal of station car parking could also negatively impact womens' safety, particularly at night, when making onward journeys from stations.</p>	1 and 2c	The provision of safer routes, including support for buses should help to mitigate the impact on women's safety	+2
Sexual orientation	No specific impacts.	N/A	N/A	0
People on low incomes	<p>Positive Emphasising safeguarding of bus and other transport infrastructure – which enables networks to continue expanding in order to support development – gives increased options for travel to people on lower incomes. This includes providing safer, more convenient and higher-quality active travel options.</p>	1	No further actions identified	+2

Overview of equality impacts

Using your findings from the table above, summarise the impacts for each group in the table below using the scoring listed above.

Guidance	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion and belief	Sex	Sexual orientation	People on low incomes
Guidance 1	+2	+1	0	0	+1	+2	0	+2	0	+2

Consider whether to break the guidance down and introduce further rows in order to make clear different equality impacts for different aspects of the guidance.

Amendments to the guidance

(only for review to the EqlA in the future)

Change	Reason for change
What changes have you made to the guidance as a result of this EqlA?	Why have these changes been made?

Recommendation

Based your assessment, please indicate which course of action you are recommending to decision makers.

Outcome Number	Description	Mark with an X (more than one box can apply)
Outcome One	No major change to the guidance is required This EqlA has not identified any potential for discrimination or negative impact, and all opportunities to advance equality have been taken.	Yes
Outcome Two	Adjustments to the guidance are required to remove barriers identified by the EqlA or better advance equality.	No
Outcome Three	Justify and continue with the guidance despite having identified some potential for negative impacts or missed opportunities to advance equality.	No
Outcome Four	Stop, rethink or abandon when the EqlA shows actual or potential unlawful discrimination	No

Monitoring

Monitoring will take place through the London Plan Annual Monitoring Report and wider monitoring of the Mayor's other strategies, as well as part of reviewing the London Plan.

Appendix A: Evidence Reference and Content

London Plan IIA (including EqIA) and Addendums

Evidence

Age

[Equality, diversity and inclusion evidence base for London](#)

The London Plan equality, diversity and inclusion evidence base identifies a number of street-level barriers that can act as deterrents to walking for older people, particularly where their mobility is affected. These include: uneven pavements; other physical features of streets such as clutter, street parking, poor street lighting, and the height and drop of kerbs; a lack of benches and other forms of seating; few public amenities, especially accessible toilets; and, finally, the local environment, including pollution and noise levels, and concerns about personal safety. Older people are more likely to feel unsafe walking after dark; and to face physical barriers on public transport, such as lack of universal step-free access and overcrowding. Older people are therefore less likely to walk; older men are more likely to drive. Those aged under 17 cannot drive, and therefore rely on other transport modes for independent travel.

Disability

[Equality, diversity and inclusion evidence base for London](#)

Street-level barriers have been identified that can act as deterrents to walking for people with physical disabilities that impact their mobility. These include uneven pavements; other physical features of streets such as clutter, street parking, poor street lighting and the height and drop of kerbs; a lack of benches and other forms of seating; few public amenities, especially accessible toilets; and the local environment, including pollution and noise levels, and concerns around personal safety. In addition, research on attitudes of disabled people to 'shared space' – an approach to street design that removes kerbs, signs, road markings and controlled crossings – has found that 35 per cent of participants deliberately avoided using such spaces.

Disabled Londoners are less likely to use public transport than non-disabled Londoners. This is partly due to costs but also because of physical, communication and attitudinal barriers that often make travelling more difficult. Research shows that 62 per cent of disabled Londoners find it difficult to use the Tube, and 58 per cent find it hard to use the bus. A majority of 61 per cent say they would travel more if barriers to travel were removed.

Gender reassignment

No evidence was found that is relevant to the Sustainable Travel, Walking and Cycling LPG.

Marriage or civil partnership

No evidence was found that is relevant to the Sustainable Travel, Walking and Cycling LPG.

Pregnancy and maternity

[Equality, diversity and inclusion evidence base for London](#)

Evidence shows that women are more likely than men to be travelling with buggies and/or shopping; and that women often find travelling with children and buggies difficult and stressful at times, especially on buses. Qualitative research by TfL on the experience of people travelling with buggies on buses found that they often experienced overcrowding, which can make it difficult to manoeuvre a buggy and keep their child/children safe. They also cite negative attitudes of other passengers; difficulties getting on and off the bus; and drivers refusing to allow buggies on as barriers. Women with small children are more likely to rely on step-free and lift access when travelling on the Tube.

Race

[Equality, diversity and inclusion evidence base for London](#)

Londoners from lower socio-economic groups are less likely to cycle.

Religion or belief

No evidence was found that is relevant to the Sustainable Travel, Walking and Cycling LPG.

Sex

[Equality, diversity and inclusion evidence base for London](#)

Evidence shows that women are less likely to cycle than men, with barriers including safety concerns. This evidence shows women preferring elements of cycling infrastructure, such as segregation of cyclists from traffic, that are safer but may not be as widely available. There is also gender inequality in family and caring responsibilities, meaning women are more likely to make journeys that may be more difficult by bike, such as escorting children. Evidence has shown that women in lower socio-economic groups are less likely to register to use the existing London cycle hire scheme, and that this correlates with being less likely to live close to a docking station. Where they do, usage among individuals in these areas suggests a currently unmet need for access to bicycles in deprived communities.

There are also differences in public transport modes by gender. Women are more likely to travel by bus, whereas men are more likely to travel by Tube and on the Overground. Low-income Londoners (people with a household income of less than £20,000) are more likely to travel by bus, and less likely to travel on the Underground.

Sexual orientation

No evidence was found that is relevant to the Sustainable Travel, Walking and Cycling LPG.

Gaps in evidence

None identified.

Appendix B: Engagement summary

Summary of protected groups engaged and engagement record

Due to the consultation taking place under pandemic conditions, all meetings and events were held virtually, using Teams as the meeting platform. Whilst we asked attendees to sign up using Eventbrite so that we could keep a record of attendees, this did not work effectively; we were therefore unable to make a complete record of all groups that engaged with this document. A concerted effort was made to engage with different groups (such as those representing disabled Londoners) through officers highlighting the consultation to these groups, in addition to work to publicise the consultation through the GLA's platforms and e-newsletters.

The consultation took place between October and December 2021. Throughout the consultation period there were 215 attendees to events; 2,151 page views; and 43 consultation responses. Consultation respondents included groups representing protected characteristics such as Hackney-based Disability BackUp; Mums for Lungs; and the Guide Dogs for the Blind Association.

Following analysis of responses received during the consultation period, the LPG has been updated to strengthen the language around ensuring that the space needed to ensure the accessibility of transport infrastructure is included when safeguarding land for transport.