

Walworth Streetspace, London Borough of Southwark

Equality Impact Assessment

November 2021

Walworth - Covid-19 emergency travel measures

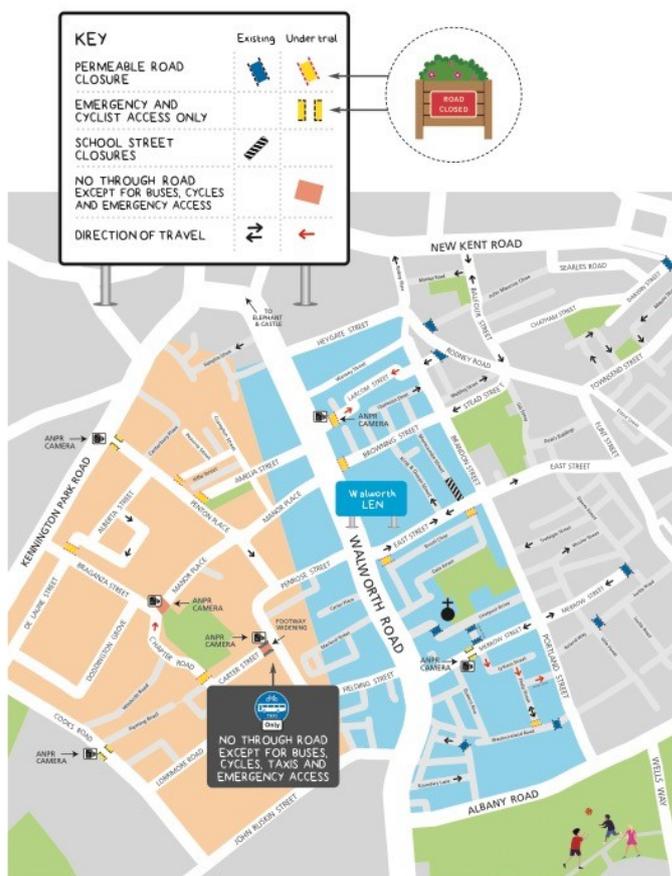


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1. The Brief

The Centre for Accessible Environments (CAE) has been appointed by Southwark Council to conduct an Equality Impact Assessment (EQIA) of Streetspace measures (‘the measures’) implemented in Walworth in 2020. This desktop review considers how the Walworth Streetspace scheme impacts on people with protected characteristics when considered against the general Public-Sector Equality Duty and provisions within the Equality Act 2010. CAE are not legal experts and, as such, this review is not a definitive legal view but rather an interpretation of whether the Streetspace measures impact on any of the protected characteristics under the Equality Act.

The Covid-19 pandemic required the government to introduce changes to society that have fundamentally altered people’s travel patterns, ways of living and working and how they use Southwark’s streets and spaces. Southwark Council identified an immediate need to safeguard local neighbourhoods from increases in traffic caused by public transport restrictions, enable safe and active travel and reallocate space for pedestrians to meet social distancing requirements. Walworth was identified as a priority, as it receives a high volume of through traffic and is an area of high deprivation compared to the rest of Southwark.¹

The purpose of this EQIA is to:

- Actively consider ways to advance equality and to identify unintended consequences and mitigate against them as far as possible.
- Foster good relations and community cohesion by identifying opportunities to work collaboratively with the council. This review is the start of a process of co-evaluation of the scheme with residents, Southwark Council and relevant stakeholders.

This final EQIA report follows the initial desktop review completed by CAE in July 2021 and incorporates feedback from the following;

- Public consultation feedback survey conducted by Southwark Council during September -October 2021 which included from protected groups: Race, Age, Disability, Religion and Pregnancy.
- Focussed consultation meetings with protected groups of Older people, Disabled people and Black, Asian, and Minority Ethnic groups conducted online on 30 September 2021.
- Monitoring report traffic trends, cycle traffic and bus journeys on internal and boundary roads by Southwark Council conducted up to June 2021.
- CAE have also referred to assessments of similar schemes in London boroughs that were implemented prior to the COVID 19 pandemic.
- Walworth Streetspace air quality modelling Final report , 14th October 2021 by Cambridge Environmental Research Consultants

Note: CAE are not legal experts and, as such, this review is not a definitive legal view but rather an interpretation of whether the Streetspace measures impact on any of the protected characteristics under the Equality Act.

¹ Multi-Ward Profiles 2019, West Central Southwark, Southwark’s Joint Strategic Needs Assessment

2. Executive Summary

Potential impacts of Southwark's Streetspace measures on people with protected characteristics under Equality Act.

The Streetspace measures were implemented in Walworth in 2020 and include installation of 17 modal filters, some physical and some camera enforced. Potential impacts of measures on people with protected characteristics are listed below in relation to different means of travel:

Travel to schools

- There are a high number of schools in West Central Southwark, including nurseries and primary schools. The Streetspace measures aim to promote healthy, non-polluting active travel. Post implementation monitoring and surveys indicate significant drop of motor traffic on internal roads and only minor increases of traffic on boundary streets which should encourage walking and cycling to schools.
- The need for more physical activity by young people is critical in this ward³. West Central Southwark has higher numbers of young people and higher child obesity (48.0% in Year 6) compared to 41.6% average for Southwark. These measures reduce levels of motor traffic, encourage more walking and cycling to the schools in the area, facilitating healthy, non-polluting active travel
- Some disabled school children being dropped off by car are likely to be negatively impacted by increased car journey times due to detours, potential main road congestion.

Impact on travel by bus

- Walking and travelling by bus are the main means of travel for disabled and older people, low-income people, women, and people from a Black, Asian and ethnic minority background according to TfL travel survey data. The consultation indicated that many people felt bus journeys were now unreliable and impacted by congestion on boundary.
- Bus journey time analysis shows an improvement (decrease) or no change in journey times along some peripheral roads including Walworth Road southbound, Kennington Park Road and Albany Road (eastbound). Only bus journeys on Albany Road (westbound), have increased.
- Bus gates, which aim to improve bus flows, have the potential to facilitate the smooth travel of buses, mini-buses and coaches transporting children to schools.
- Bus journey times need to continue to be monitored and bus routes prioritised.

Impact on walking and cycling

- Disabled, older people and those from Black, Asian or ethnic minority groups are more likely to walk for most journeys according to TfL travel data². Streetspace measures have

² [Travel in London, Report 13, Transport for London, 2020: Understanding our diverse communities. A summary of existing research, Mayor of London, Transport for London, 2019](#)

the potential to increase levels of active travel by facilitating safe outdoor space (with respect to social distancing and also from traffic collisions).

- Accessibility of street environment: Existing streets are not always accessible or easy for walking and cycling. Restriction of motor traffic needs to go hand in hand with improving the accessibility of the street environment and it is recommended street audits are carried out to assess accessibility. Disabled people often feel excluded from exercise and active travel.
- In addition, some mobility impaired disabled and older people may find it easier to cycle rather than walk³. A study⁴ of other traffic schemes found residents increased walking and cycling relative to people living elsewhere in Outer London. Further engagement with older and disabled people's groups should be carried out to identify further measures to improve the walking and cycling environment and how this may vary based on disability type needs or specific mobility issues.
- It is noted the Streetspace measures include public street seating on Amelia Street and Cooks Road. This is likely to have a positive impact for many mobility impaired people and people with neurodiverse conditions who need regular rest and seating points while traveling. Providing community seating also has the potential to encourage social interaction reducing loneliness and alienation and improving mental health.⁵
- Although not broken down by protected groups across all roads cycle volumes have increased by **+34%** with highest increases are in West Walworth, external roads by **+129%** and internal roads by **+53%**. There is no breakdown on ages, abilities, gender or race of cyclists which should be further monitored to determine if there is more equal spread of cycling increase across protected groups.

Impact on travel by car and LGVs

- Traffic monitoring indicates the overall volume of motor traffic recorded across all streets in the Walworth Streetspace schemes has decreased by **16%** (compared to 8% across all of Southwark). The volume of motor traffic counted on internal streets in the Streetspace schemes had decreased in the West Walworth area and 53% in the East Walworth area. The volume of motor traffic counted on external streets had remained fairly static **+7%** in the West Walworth area and decreased by **-7%** in the East Walworth area.
- Vehicle speeds have not changed much. Whilst some variation has been observed, in general this has been very low or related to low vehicle flows.
- Traffic restriction measures can play a key role in reducing car ownership and use. Reduction of motor traffic and associated noise levels are linked to an improvement in public health including reducing risk of stroke and premature death⁶.

³ [Wheels for Wellbeing annual survey, 2018](#)

⁴ [Low traffic neighbourhoods and population health, BMJ, Feb 2021](#)

⁵ [Driven to excess: Impacts of motor vehicles on the quality of life of residents of three streets in Bristol UK and For good neighbours, live in a quiet, car-free street](#)

⁶ Road traffic noise is associated with increased cardiovascular morbidity and mortality and all-cause mortality in London, European Health Journal, June 2015

- The scheme has had a negative impact on some disabled and older people, parents and carers with small children who need to use a car to travel, and those whose work requires use of car to carry items or for security reasons, due to the length of detours required, and impact of potential increased congestion on any main roads. Further engagement with older and disabled people's groups, carers and night-time workers, and careful monitoring of the impact on their travel modes needs to be undertaken.
- Driving restrictions have made some essential services inaccessible to disabled people who need to drive or be driven or visited by carers. The exemption provided to Blue Badge and companion badge holders within schemes will mitigate the negative impact of these measures on disabled people and their carers.
- The blue badge exemption only extends to the specific scheme area and not beyond it and feedback from respondents noted their essential car journeys extend across the borough and beyond it.
- Areas near filters where motor traffic may need to make a U-turn to exit the street need to be monitored for impact on air pollution and street safety. These movements should be reduced by early signage warning of filters well in advance.

Traffic displacement impact on external streets

- With schemes of this type restricting motor traffic along residential streets there is potential there will be increased congestion on boundary and main roads due to traffic displacement. *However*, traffic monitoring indicates a drop in motor traffic of 16% overall in the Walworth area and much higher drops within the scheme area of 40% in the West Walworth area and 53% in the East Walworth area. On external streets impact varies. Volumes have increased by 7% in the West Walworth area and decreased by 7% in the East Walworth area.
- It is worth noting that evidence compiled from previously implemented similar motor traffic reduction schemes in London and elsewhere, in an article⁷ published by Living Streets, indicates that fears of traffic displacement problems almost always fail to materialise, and that significant reductions in overall motor traffic levels across an area can happen as a result of people making a wide range of behavioural responses to the new traffic configurations.

Air pollution

- Reducing air pollution promotes better respiratory health for everyone including protected groups, in particular children and young people, disabled and older people. Poor air quality is caused by vehicles on our roads⁸ and causes an estimated 9,500 early deaths in London annually⁹.

⁷ Evaporating traffic? Impact of low-traffic neighbourhoods on main roads, article by Emma Griffin, London Living Streets, July 2019 <https://londonlivingstreets.com/2019/07/11/evaporating-traffic-impact-of-low-traffic-neighbourhoods-on-main-roads/>

⁸ [Transportation's emissions in the UK - Statistics & Facts](#), May 2021

⁹ [Understanding the Health Impacts of Air Pollution in London](#), Kings College London, TfL and GLA, 2015

- Pollution levels are a particular consideration in the Walworth area- the GLA Air Quality in London study¹⁰ shows that air quality in Southwark on Old Kent Road bordering the Walworth area exceeded the recommended WHO maximum of 20 µgm-3 for PM10 particulates. Pollutants¹¹ and particulates for children can mean stunted lung growth, increased rates of asthma and an increased risk of poor health later in life. However, the displacement of traffic to boundary roads should be regularly monitored to ensure the measures have a long-term impact on reducing air pollution.
- The Air Quality Monitoring final report (October 2021) commissioned by Southwark Council, and carried out by Cambridge Environmental Research Consultants, shows that both pre scheme and post scheme implementation, the air quality objectives set of 40 µg/m³ for annual average NO₂ concentrations are met throughout the scheme area except for some areas along two roads, the A3 and Walworth Road, predicted to exceed the air quality objective of 40 µg/m³ for annual average NO₂ concentrations. Along Walworth Road traffic volumes are predicted increase in some areas and decrease in others with the scheme in place; scheme traffic monitoring was not available for the A3; therefore, the modelling shows no change in concentrations along this road. The report shows that air pollution mortality burden calculations estimate that the Walworth LTN schemes have a marginal positive health impact.
- Note that pre and post scheme traffic monitoring were not available for the A3 and A202 boundary roads, therefore the air quality modelling has not assessed potential scheme related changes along these roads.

Road traffic injuries and crime

Traffic monitoring indicates the overall volume of motor traffic recorded across all streets in the Walworth Streetspace schemes has decreased by **16%** (compared to 8% across all of Southwark).

- Road traffic injuries are most common among vulnerable groups, including older and disabled people and children. As pedestrians, disabled people are five times more likely to be injured by a motor vehicle than non-disabled people¹². Evidence indicates area-wide traffic restriction schemes reduce injury risks across all groups inside the neighbourhood, without negative impacts at the boundary¹³.
- Traffic schemes have the potential to lower crime levels. Crime levels are disproportionately high in the Walworth area affecting particularly low-income communities. Evidence¹⁴ of a Low Traffic Neighbourhood (LTN) in Waltham Forest resulted in a 10% decrease in total street crime after introduction, and 18% decrease after 3 years.

Access to green space

¹⁰ Air quality in London Impact Evaluation, (Table 8), 2016-2010, GLA, October 2020 (Table 8)

¹¹ The effects of air pollution on the health of children, article from Paediatric Child Health, Vol 11, No 8, 2006

¹² Inequalities in self-report road injury risk in Britain: A new analysis of National Travel Survey data, focusing on pedestrian injuries, Journal of Transport and Health, Rachel Aldred, June 2018

¹³ [The Impact of Introducing Low Traffic Neighbourhoods on Road Traffic Injuries | Published in Transport Findings, 2021](#)

¹⁴ [The Impact of Introducing a Low Traffic Neighbourhood on Street Crime, in Waltham Forest, London, Jan 2021](#)

- Lowering levels of motor traffic on streets has the potential to make it easier to get to parks and open spaces, such as Burgess Park, by making street crossings safer and making it safer to walk and cycle along streets.
- The Streetspace measures also provide planters on the street with planting. Greener street environments provide mental health benefits, which has a positive impact on disadvantaged groups especially who may not have access to outdoor space in their homes. Allowing local people to contribute to the planting and gardening would also have a positive impact on mental health.

3. Consultation summary feedback from protected groups under Equality Act 2010

Public Consultation summary

The Council has carried out an extensive public consultation process and has sought to understand specific needs of people from groups with protected characteristics through targeted questions.

The majority of on-line respondents who were older residents, disabled residents and those from Black, Asian and Minority Ethnic groups are more likely to favour outright removal of the scheme rather than modification of the measures or a different measure.

It should be noted that the majority of people who responded owned one or more car or van. This does not fully reflect the majority of older, disabled and Black, Asian and Minority Ethnic groups who are more likely to walk and take public transport¹⁵. Car ownership levels are low in the area. Households owning one car or more average at 34% in Walworth SE 17 which is below the Southwark average of 50%¹⁶.

Focus group consultation meeting outcomes

Southwark carried out three focus group consultation meetings involving groups with protected characteristics, these were with people from Black, Asian, and Minority Ethnic people, older and disabled people. These meetings were held via an online platform on 30 September 2021. The number of attendees was low. The majority of those attending expressed **dissatisfaction with the schemes** with a smaller proportion of respondents report they have benefited from the schemes.

* Note: Since the implementation of the scheme Southwark Council have provided exemptions for Blue Badge holders to drive through camera enforced filters in their specific scheme (but not beyond it).

¹⁵ Travel in London, Report 13, Transport for London, 2020: Understanding our diverse communities. A summary of existing research, Mayor of London, Transport for London, 2019

¹⁶ 2021 Cars registration data for Southwark (Vehicle Licensing Statistics)

4. Southwark Streetspace measures in response to COVID-19 in the Walworth area

Introduction of government directives in response to the Covid pandemic

The use of modal filters to create motor traffic restricted areas has been used across the UK for many decades. However, in May 2020 fast track implementation of such schemes was required by the UK government as response to the Covid pandemic to facilitate walking and cycling and prevent a return of high car traffic levels. Local authorities were asked to reallocate road space from cars to walking and cycling, both to encourage active travel and to enable safe social distancing during restart after the pandemic.

In July 2020, the UK government published '[Gear Change: A Bold vision for cycling and walking](#)', which set out a range of commitments to increase levels of active travel that included provision of motor traffic restriction measures. These were funded as emergency measures via TfL's [Streetspace programme](#) and the Department for Transport's Emergency Active Travel Fund, with 4% of the Greater London population covered by schemes introduced from March to September 2020.

How Streetspace measures work

One of the Streetspace measures is the creation of a network of primarily residential streets where temporary or permanent filters restrict the passage of through motor traffic through placing of planters or via signage enforced by ANPR cameras. People walking, cycling, or using wheelchairs or mobility scooters can travel through the restrictions, as can emergency and service vehicles in certain locations that are camera enforced. Where restrictions are created through the placing of planters, no motor vehicles can get through and will have to make a detour. The objective is to reduce through motor vehicle traffic and to deter shorter, unnecessary car journeys that could potentially be made on foot, cycle or by bus. This will potentially create safer space for walking, cycling and outdoor safe social interaction.

5. Streetspace measures implemented in Southwark

Pre 2020 level of provision

Before the Covid pandemic, Southwark Council already had a number of existing motor traffic restriction measures, with 52 modal filters installed pre 2020. From March to September 2020, 38 additional modal filters were installed, covering 1.2 sq. kms across the borough or 4.1% of the borough. During 2020, Southwark Council implemented a larger Streetspace scheme in Walworth in the North of the borough and has implemented smaller schemes in Dulwich.

The table below from the recent study *LTNs for all?*¹⁰ compares Southwark implementation compared to other local authorities. The study finds that Southwark, with a high level of deprivation (including living environment deprivation) has one of the highest levels of new modal filters per 100kms in London, impacting a higher proportion of its deprived residents compared to other London boroughs.

Borough	Existing modal filters, 2020 pre-Covid ⁷⁵	New modal filters (March-Sept 2020)	New LTNs (sqkm)	% of borough covered by new LTNs (built March-Sept 2020)
City of London (Inner)	18	43	1.4	48.5
Southwark (Inner)	52	38	1.2	4.1
Westminster (Inner)	28	36	0.6	2.9
Ealing (Outer)	45	31	3.1	5.6
Lambeth (Inner)	38	27	3.2	11.7

Walworth Road Area Traffic Study, 2019

The Southwark Streetspace scheme was informed by a Walworth Road Area Traffic Study conducted for Southwark by Steer in June 2019. This was based on an analysis of vehicular travel patterns in the Walworth Road area. The aim of the study was to:

- inform the development of traffic management proposals to identify patterns of through traffic
- assess changes necessary to reduce traffic within the residential area
- improve east-west cycling and walking conditions
- to support a potential bus-only scheme along Walworth Road.

Southwark implemented Streetspace measures to reduce the volume of through traffic based on the patterns identified by this study.

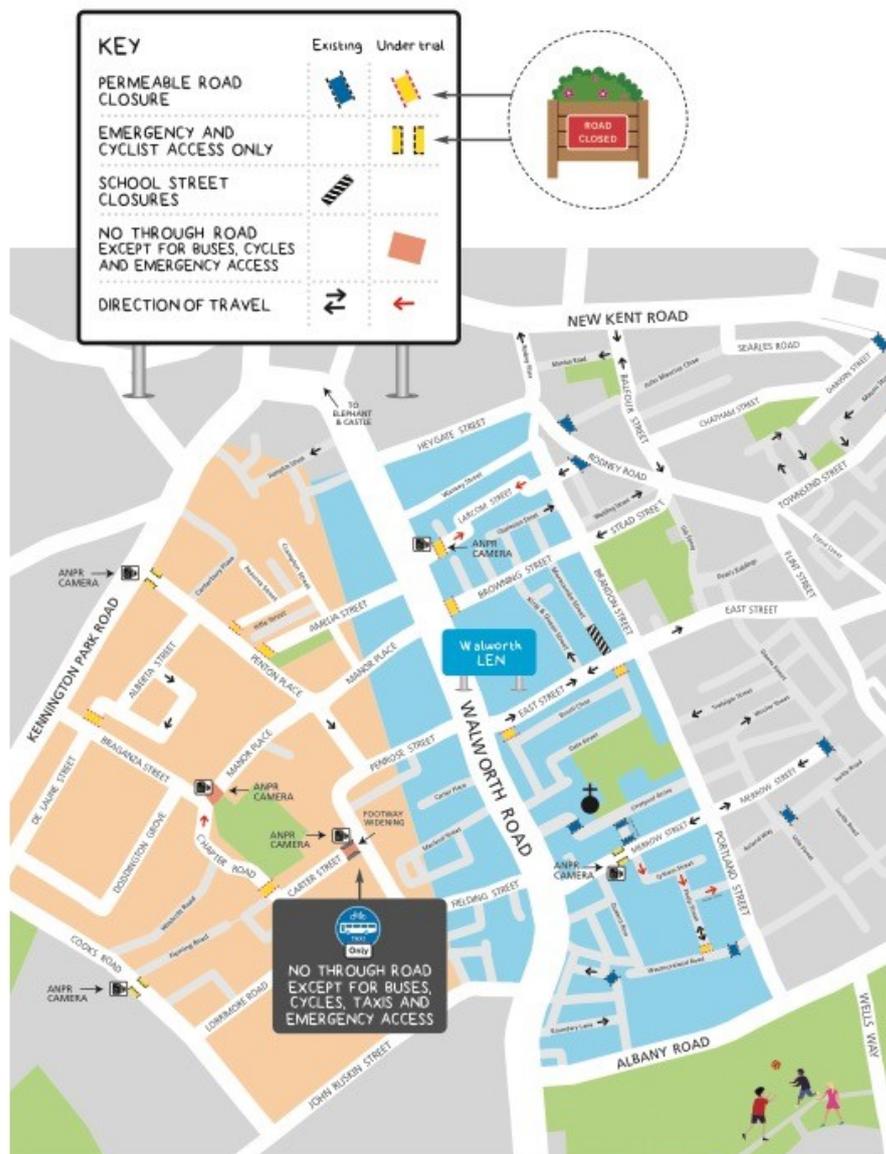
Southwark Streetspace measures 2020 in the Walworth area

This section sets out the new Streetspace experimental measures implemented in the Walworth Road area in West Central wards of Faraday, North Walworth and Newington. Walworth was identified as a priority, as it receives a very high volume of through traffic and also has a high concentration of residents who are vulnerable to Covid-19. The Council reviewed the measures informed by an earlier consultation for the Walworth Low Emission Neighbourhood - '[Our Healthy Walworth](#)' - and identified measures that would most increase pedestrian circulation space for social distancing and encourage active travel.

The measures include a number of modal filters covering Faraday, Newington and North Walworth wards in an area bounded by Brandon Street to the north, Portland Street to the east, Albany Road to the south, Kennington Park Road to the west and with Walworth Road running centrally from north to south through the modally filtered area. Some of the filters are ANPR camera enforced and others are physical barriers using planters that allow walking and cycling through, but do not allow cars through, requiring emergency vehicles and car users to make a detour. It is noted that some of the camera enforced filters allow buses, taxis and emergency services through them, as they work by number plate recognition.

Southwark installed the first and second phase of measures in July and September 2020. This included permeable road filters on Amelia Street, Larcom Street, Penton Place, Alberta Street, Cooks Road, Chapter Road, Merrow Street, Browning Street, Walworth Place, Blackwood Street and a bus and cycle gate on Carter Street and Manor Place. They also reversed the one-way system on Chapter Road to northbound.

Walworth - Covid-19 emergency travel measures



In October 2020, the next round of measures included:

- Permeable road closures:
 - Merrow Street (relocating current modal filter and changing to ANPR camera enforcement)
 - Phelps Street (using planters and bollards)
 - Cooks Road – modified the permeable closure on Cooks Road to one with an ANPR camera to permit emergency vehicle access.
- Introducing or amending one-way systems on:
 - Lytham Street

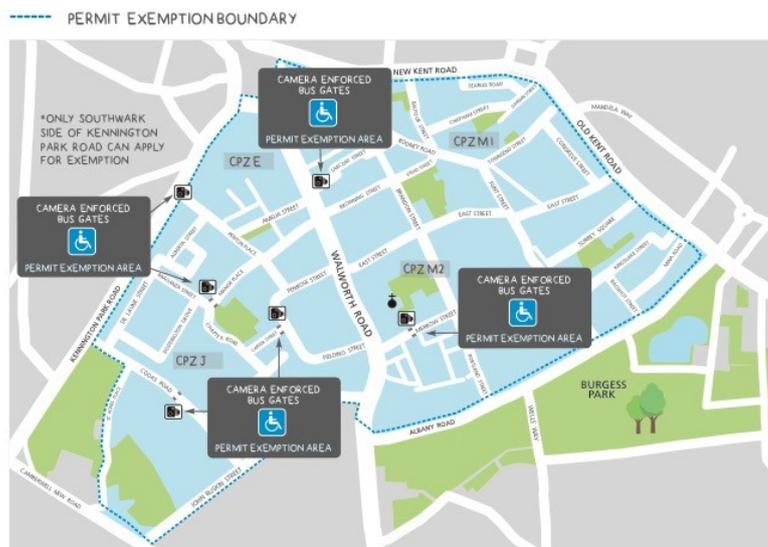
- Phelp Street, which also has a traffic filter at the junction of Westmoreland Road
 - Sondes Street (reversing from Westbound to Eastbound)
- Introducing a loading bay in Browning Street.

Essentially these measures restrict through motor traffic within the zones of the schemes while still allowing each address to be reached by a motor vehicle, albeit via a detour around a motor traffic filter (with exemptions for Blue Badge holders within the schemes where camera enforced filters are provided).

Exemption for Blue Badge holders within Streetspace trial measures

Southwark Council has provided an exemption for Blue Badge holders to travel through camera enforced restrictions within the specified boundary area of their neighbourhoods. This has been published on their website [here](#).

Easier travel for blue badge holders in Low Traffic Neighbourhoods: Walworth



This exemption for Blue Badge holders will benefit disabled people who depend on their cars to provide mobility, reducing detours and lengthy journeys that can cause physical discomfort, anxiety, and stress. This allows one exempt car per Blue Badge - so could be applied to a carer instead

Clear maps are provided to indicate the location of the bus-gates that are exempted and of streets with the location of modal filters. The map below shows where in Walworth Blue Badge holders can apply for an exemption to travel through camera enforced bus gates.

Access to every property within the area of Streetspace measures always remains available for all road users.

It is noted that Blue Badge holding drivers need to drive across the borough through other neighbourhoods as their medical centre or destination may not be within their own

neighbourhood. **Providing Blue Badge exemptions to allow drivers to drive through other neighbourhoods is a strong theme that emerged from the consultation.**

Seating and rest areas provided as part of Streetspace

Public seating and meeting areas provide opportunities for older and disabled mobility impaired people to rest along their walking journeys.

These also provide opportunities for safe outdoor social interaction reducing loneliness and social alienation and provide which can improve mental health.

Further opportunities for providing public seating and meeting areas on streets have been identified and implemented. In addition, temporary street activation measures to encourage children to play outdoors have been introduced.

Monitoring impact of changes

It is noted that Southwark Council is collecting traffic data at key sites in the area, including the residential streets and the bordering distributor roads. Video surveys are installed around the area at key junctions and high footfall areas to assess how the streets are being used by the community.

Southwark are using air quality modelling as a reference to the impact of the changes with a supplementary set of 15 air quality monitoring sites in the Walworth area.

Monitoring is being carried out on the bordering and peripheral roads to assess any potential traffic displacement including John Ruskin Street, Walworth Road, Brandon Street and Albany Road. The data gathered will be considered in the ongoing phases and whether mitigation measures are required.

Southwark also monitored community feedback provided through the Commonplace map and held (virtual) meetings with key community stakeholders which include residents-associations, businesses, local community groups and schools.

The monitoring criteria being used to assess the scheme are:

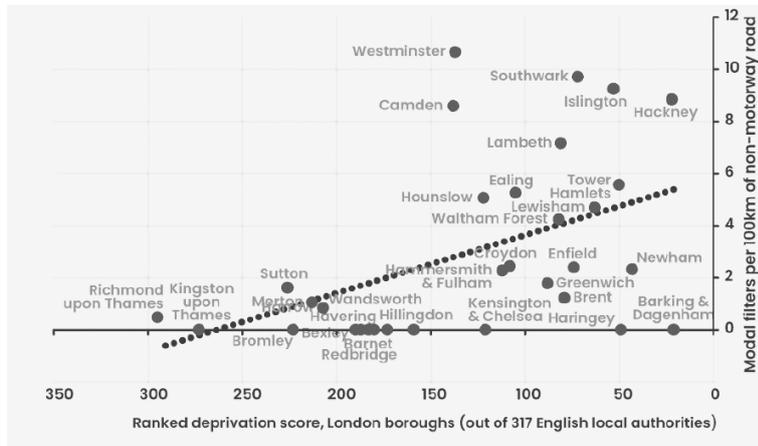
- Net changes in traffic in the residential areas
- Modal shift towards walking and cycling, with particular focus on the journey to school and short trips
- Qualitative feedback from residents, local community and businesses
- Use of public space by the community for active travel, leisure or play
- Net changes in traffic on the distributor roads in comparison to London-wide traffic changes

6 Streetspace measures in relation to equity

It is noted that Southwark is one of the most deprived boroughs in England with a rank of 40 out of 326 local authorities. Almost a third of Southwark's residents live in communities ranked in the 20% most income deprived in England. There are high levels of deprivation relating to the outdoor living environment across the borough. When looking at the sub-domain that

focuses on **air quality and road traffic collisions**, all residents in Southwark live in communities ranked as the 20% most deprived in England¹⁷.

The table below highlights Southwark's ranked deprivation score in relation to provision of Streetspace measures from the recent study *LTNs for all*¹⁸?



Reducing high motor traffic volumes, with consequent reduction in pollution, road danger, ill-health and inactivity in an equitable and fair way has potential to improve the poor quality of the outdoor living environment across Southwark. However, due to potential negative impacts of traffic displacement in neighbouring streets, main and boundary roads, it is essential motor traffic levels are monitored in these areas, so that mitigating action can be taken to ensure these areas are not affected by rising motor traffic levels.

Characteristics of West Central Southwark

Deprivation, ethnicity, and preventable mortality

- Levels of deprivation across West Central Southwark are high, with North Walworth ranked as the most deprived ward of Southwark (out of 23);
- The West Central wards are more ethnically diverse than the rest of Southwark. 60% of Faraday's population is non-white and over 50% North Walworth and Newington's population is non-white.
- Levels of preventable mortality are 14% higher in West Central Southwark than the national average.
- Rates of emergency department attendance are much higher in West Central Southwark than the borough average.
- North Walworth also has a high crime rate of 195 offences/1000 residents compared to 115/1000 residents across Southwark.

Children and young people

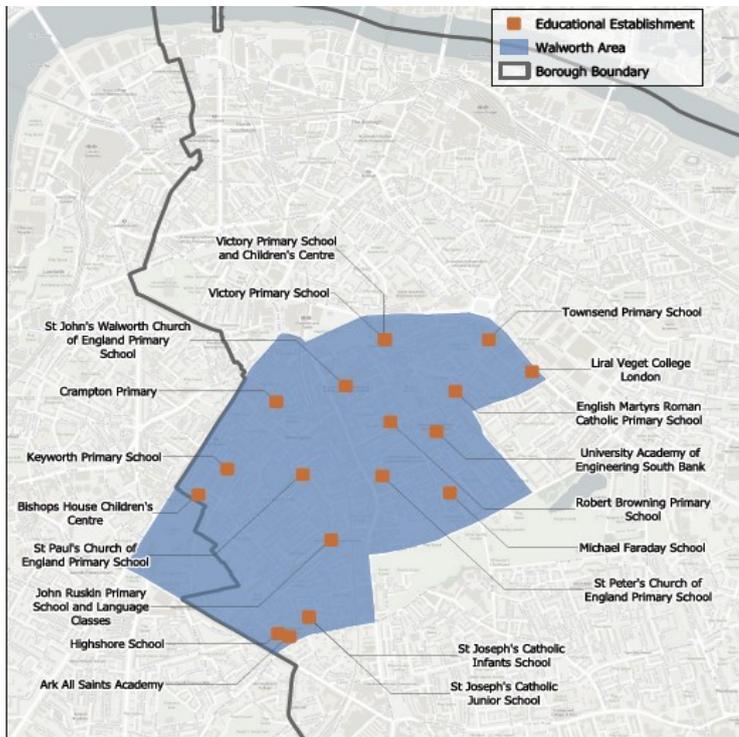
- West Central Southwark has a high proportion of young people and children compared to the rest of Southwark.
- Levels of child poverty in West Central Southwark are high at 21.9% compared to the borough average of 18.5%.

¹⁷ Indices of Deprivation, JSNA Factsheet, Southwark 2019

¹⁸ *LTNs for all? Mapping the extent of London's new low traffic neighbourhoods*: a report by Possible and the Active Travel Academy, Aldred R, Verlinghieri E. 2020.

- Levels of child obesity in West Central Southwark are high at almost 30% compared to the borough average of 25.7%.

There are a high number of schools in the Walworth area as indicated in the map below.

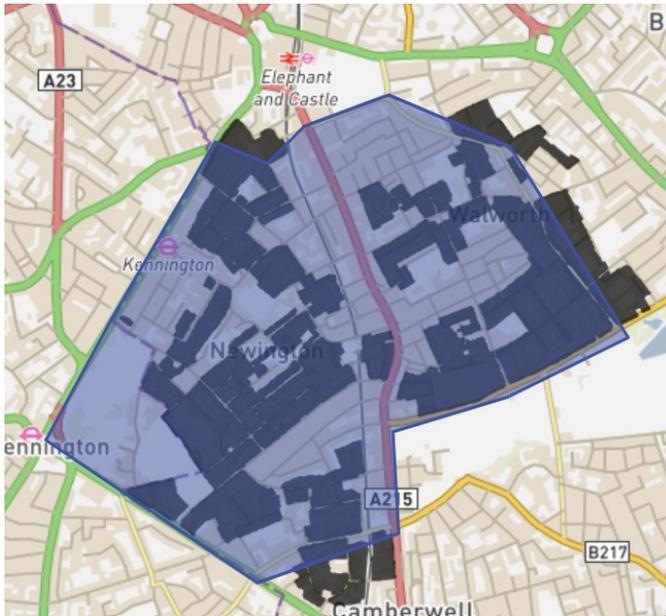


Schools in West Central Southwark

People living in social housing

Many more people (32.4%) live in social housing in West Central Southwark than the borough average of 24.6%. Newington ward has 46.8% of people living in social housing with 38.3% in Faraday.

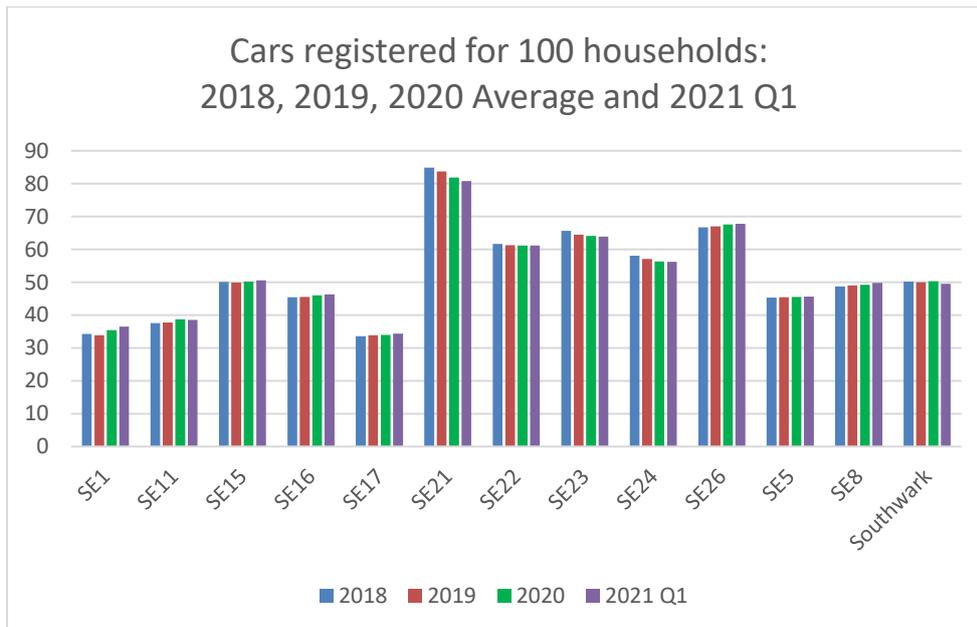
The map below (darker shaded areas) indicates the social housing in Walworth area.



Social housing in Walworth

Car ownership levels.

Car ownership levels are low in the area. Households owning one car or more average at 34% in Walworth SE 17 which is below the Southwark average of 50%¹⁹.



¹⁹ 2021 Cars registration data for Southwark (Vehicle Licensing Statistics)

7. Southwark public consultation with Protected Groups under the Equality Act

Overall, the consultation with protected groups aimed to ensure the changes benefited the whole community and reduce inequalities in health and wellbeing.

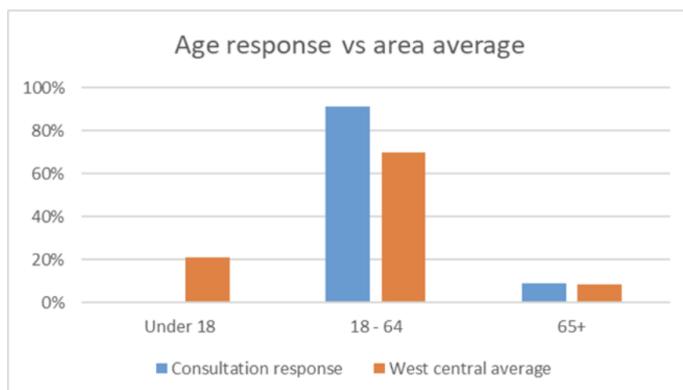
Since implementation, Southwark Council has been using online platforms for engagement with residents using the Commonplace platform <https://walworthstreetspace.commonplace.is/>

Note: Due to the perceived urgency of the situation, these measures were permitted by the government via new legislation and statutory guidance introduced temporarily using Temporary or Experimental Traffic Regulation Orders (TROs). These orders allow measures to be put in place on a trial basis with consultation happening concurrently during the implementation period. Authorities must put in place monitoring arrangements and carry out ongoing consultation once the measure is built.

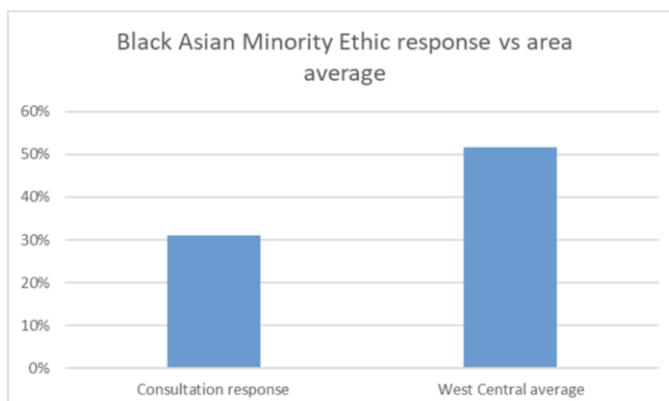
Online public consultation

The following are the results from the public online consultation.

The profile of the respondents was not fully representative of the profile of the population in the area. A smaller proportion of people under the age of 18 years responded and a higher proportion of those 18-64 years responded than are average in the area.



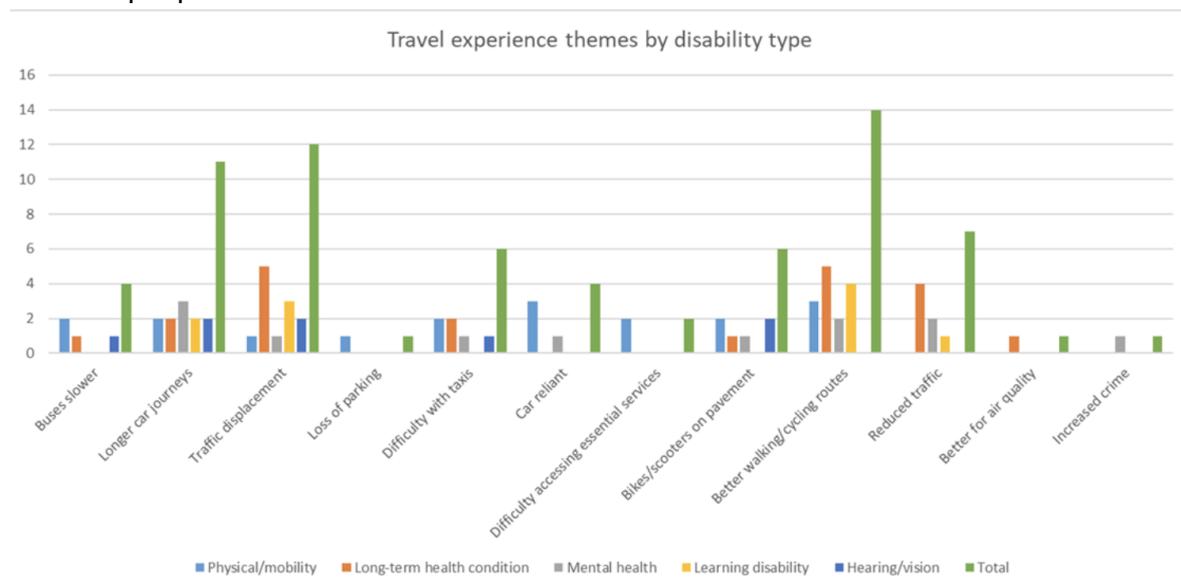
A smaller proportion of Black, Asian and Minority Ethnic people responded (30% of total) than are average in the area (over 50%)



Response from disabled people

- 12% of all respondents self-declared as disabled
- Breakdown of impairments (self-declared) was as follows:
 - 14% with mobility impairment
 - 7% with mental health impairment
 - 10% with learning disability
 - 6% with hearing or vision impairment
 - 16% with long-term illness
 - 44% preferred not to state type of disability
- Car ownership among disabled people who responded was high at 60% owning one or more cars. 31% owned a cycle or scooter.
- Support for general aims of the scheme was high, though majority (51%) were against repurposing of the street with only 41% in favour.
- Travel behaviour change was limited with many travelling less by public transport, but many walking more.
- Most felt travel by car had become more difficult (57%) while 43% reported walking and cycling were easier.
- The impact of measures on disabled people was mixed
 - 47% said benches and resting places helped them.
 - Most (65%) felt they were less connected with friends on their street
 - Most (63%) felt it took longer for carers and family to visit
 - 78% said it took longer to get around by car.
 - Most disagreed that it made it easier to get around by foot, cycle or mobility scooter
- Based on their experience of the measures, a majority (53-55%) did not want their streets or other streets to have changes to restrict traffic and encourage people to walk and cycle or to use public transport more.
- Preferences for retaining measures or returning streets to how they were before vary from street to street, but with bulk of preferences for all streets to be returned to how they were before the changes.

Travel experiences described as a result of Streetscape changes varied for different groups of disabled people.



- The highest proportion across all groups of disabled people felt that walking and cycling routes were better, with a smaller proportion reporting reduced traffic in their area.
- The next biggest issues for all were traffic displacement and longer car journeys, followed by difficulties with taxis and cyclists and scooter users riding on the pavement.
- All disabled groups equally found car journeys longer. Those with mobility impairments were particularly car reliant.
- Buses were found to be slower mainly by people with mobility impairments
- Traffic displacement was particularly felt by those with long term health conditions and those with learning disabilities.

Response from older people (65+ years)

- 57% owned one or more car or van
- 62-71% agreed or strongly agreed with improving air quality, bus reliability and encouraging walking and cycling but did not agree with repurposing street space.
- Most felt car journeys were longer, and they had experienced more bikes/scooters on the pavement;
- Most felt the measures did not make it easier to walk and cycle or feel more connected to the local area
- Most did not want their street or other streets to be traffic restricted and wanted measures reversed.
- Preferences for retaining measures or returning streets to how they were before vary from street to street, but with bulk of preferences for all streets to be returned to how they were before the changes.

Response from people from Black, Asian and Minority Ethnic groups

- 50% of respondents were White British, 7% Black British and the others spread across different ethnicities.
- 59% of respondents from Black, Asian and Minority Ethnic groups owned one or more car or van.
- Respondents from Black, Asian and Minority Ethnic groups were more likely to disagree with the aims of the scheme and against re-purposing street space
- While many responded that walking and cycling had become easier, the majority said car travel had become more difficult.
- Public transport use had fallen.
- Preferences for retaining measures or returning streets to how they were before vary from street to street, but with a large majority wanting streets to be returned as they were before changes.

Focus group meetings with protected groups

The London Borough of Southwark has conducted three focused consultation meetings involving groups with protected characteristics under the Equality Act during September 2021 including:

- Disabled people focus group meeting, with 4 attendees
- Black, Asian and Minority Ethnic communities, with 8 attendees
- Older people focus group meeting, with 6 attendees

These consultation meetings were held online. The following is a summary from the discussions.

Consultation meeting with disabled residents, 30 September 2021

Four people attended the meeting. Three reported negative impacts due to restrictions on their driving and parking which means they cannot visit friends and family by car, and they cannot be easily visited by car, which was essential to their well-being, and also of traffic displacement on John Ruskin Street as follows:

- A 76-year-old resident living on Alberta Street has mobility issues. They have difficulty carrying things and need to use a car. They cannot drive easily to or be visited by grandchildren or friends 400 yards away to take things or see them, as they now have longer car journeys with increased traffic on John Ruskin Street. ANPR should allow resident exemptions, or there should be timed restrictions. They support measures on Alberta Street.
- Another resident received a PCN on Cooks Road despite being a blue badge holder. The measures feel like living behind a wall. Family and friends can't visit by car and they would rather have the through-traffic returned. Restrictions are oppressive and they feel stressed. They already have enough greenery in the area. The place is now silent like a graveyard. They feel marginalised without easy use of car.
- Another resident on John Ruskin Street (JRS) does not qualify for a Blue Badge, but relies on car use. They report there is more traffic on JRS particularly during school times. There are high levels of pollution and HGVs on JRS. Cooks Road now has a high-level of mopeds. Lots of delivery drivers outside of McDonalds and e-scooters are impacting pavement space. Traffic has caused more driver aggression and increased speeding.

One disabled respondent supported the scheme:

- This resident on Cook's Road reported being delighted with the scheme as it reduces traffic and it's safer. They are partially sighted and use public transport. There used to be convoys of traffic on Cook's Road. It's now easier to cross the road due to less traffic, particularly at side street junctions. Feels it is much quieter and peaceful now and very enjoyable as should be in a residential area. Signage at Kennington Park Road could be improved, and SAT NAVs need to be updated.

Consultation meeting with Black, Asian and Minority Ethnic residents 30 Sept 2021

8 people attended the virtual meeting on 30 September 2021. Six attendees reported increased difficulties including:

- Resident on Wansey Street, who cares for an autistic son has a longer car journey home from work, and sometimes her son is left at home by himself as carers cannot stay for longer. She has difficulty parking near home due to lack of parking spaces and received 3 tickets which were unaffordable.
- Another resident also has an autistic child and cannot use public transport. Their car is constantly stuck in traffic on main roads. They felt the new seating on Browning Street was

attracting loitering. They felt the scheme was a stealth tax on motorists. More disabled (Blue Badge) parking is required.

- A resident on Brandon Estate reported they now have longer car journeys. No access to local EV charging points and have to go on diversion to get to it. They felt John Ruskin Street (JRS) and Walworth Road junction needs to be signalised. The measures stop them from easily accessing homes by car and are inconvenient for car-owning residents. It has made a car-driving lifestyle difficult. Also report emergency services have found it difficult to get through. JRS is seeing worse behaviour by cyclists and drivers.
- A resident who works in the local area for London Metropolitan Tabernacle feels that the streets are not safer, there is more pollution and extra traffic. People were not enjoying the area. It is difficult to collect children for youth clubs. They felt there was no consideration for local area and local people who used cars. Fines unfairly hit poor families.
- A carer of elderly mother is blocked in at Doddington Grove and can only use car going via John Ruskin Street. Trying to go to hospital appointment by car is difficult. Received 3x fines and hit families economically hard. Regular trips round the area by car are now made more difficult. Refuse is more difficult to collect.
- Another resident says they feels ghettoised and trapped and compared it to the Grenfell massacre. The scheme is leading to certain locations gathering gangish behaviour. There is longer emergency service access. Can't sleep due to stress. Deliveries and taxis charging more which affects poor people more.

Two residents, however, supported the scheme:

- A resident on Mcleod Street, supported the scheme, as they now walk and cycle more around the area. Car ownership is low so should benefit majority of people in the area.
- A resident on Manor Place appreciated the measures as they walk and cycle around the area and appreciate having low traffic routes. They suggest consideration of one-way access but reducing through-traffic.

Consultation with older residents (65 years and over)

Six older people attended the virtual meeting. The group was equally divided as to benefits and disbenefits of the measures.

Three consultees reported negative impacts of the scheme as follows:

- A resident in Penton Place says measures have created an unsafe environment with no improvements to the pedestrian environment. Cycling and scooting is not an option for the elderly. Exemptions for blue badge holders do not help older people. The closure at Manor Place stopped them from being able to drop off shopping to local elderly people where they would also socialise with them. This creates isolation for older people which now seems to be permanent following the pandemic. All traffic has been pushed on main roads where there are shops and where people spend their time. This has just moved the pressure points.
Would like the measures to be removed and width restriction on Penton Place to be returned. Lots of people reversing causing more pollution and noise. This is a penalty on local people in the name of stopping through-traffic. The measures are discriminatory against local people but older people in particular. Parking has also been removed which makes things difficult. Does not object to aims just think it needs to be done differently.

Play areas that have been created cause conflict with cyclists and are unsafe. Seats next to parks are unnecessary. Some seating is good but this should not be in the middle of a road. Bins take up space on pavements. Primarily it is about car accessibility to your home. Also too much street clutter and signage on Penton Place.

Delivery drivers can't access until after 5 which puts drivers under stress

- Another resident says restrictions have made life difficult for those driving. They don't feel safe cycling but walk a lot and measures have made no difference to this. Traffic displacement now on John Ruskin Street. Would like to see traffic calming measures on JRS. Some restrictions could be retained but more avenues for local journeys by car are essential. The abilities of the young and able have been prioritised over the needs of seniors. It needs to be a balanced approach and traffic shouldn't be focussed on one road but distributed.
- A resident on Brandon Street has had difficulty with emergency service access. Paramedics could not find the route to him during an emergency and they had to be directed. Walworth Road was gridlocked which also delayed them. Measures have displaced pollution and traffic.

Three attendees reported significant benefits of measures to them:

- One resident reported a massive improvement in quality of life. Enjoys anything that reduces car dominance & pollution and believes that these measures do that. Nicer to see people on feet, bicycles and children playing. Older people are able to walk more safely and easily. Owning a car is extremely expensive. As a family they looked at alternative way of travelling as private car ownership is not sustainable.
- Another resident, a car-owner, feels that the measures have forced him to be more active. Would usually give a lift to a relative to the Brandon Estate but now they walk. Cooks Road was a terrible rat-run but the measures have tackled that. Drivers are not trying to get quickly from A to B now as it's just local access. They are cycling more as well despite not being completely physically fit. Now more active and feel safer. Have to ensure the main roads function correctly, and would support improvements to the main roads e.g. phasing traffic lights. Minority of car owners should not dictate transport in area where majority do not own cars.
They feel much safer cycling. Cycling locally is a pleasure and would ask those that don't anymore to consider taking it up again. The measures have forced us to think differently about the way we travel.
The gridlock on Kennington Park Road pre-dates Covid but still needs to be improved.
- Another resident felt measures are a good first step. Need to be tweaked to ensure emergency service access and Blue Badge Holders can get through but would like to see more of them. They approve completely and now cycle to meet their children. However, bus journey times have increased.

Next steps

To mitigate any negative impact on protected groups further consultation with affected groups including school PTAs, school children, bus users, disabled and older people needs to be carried out.

8. Bus Journey Times and Traffic Monitoring

The London Borough of Southwark has been monitoring traffic levels (vehicular and cycle traffic), and bus journey times since implementation of the Streetspace scheme compared to pre-implementation times.

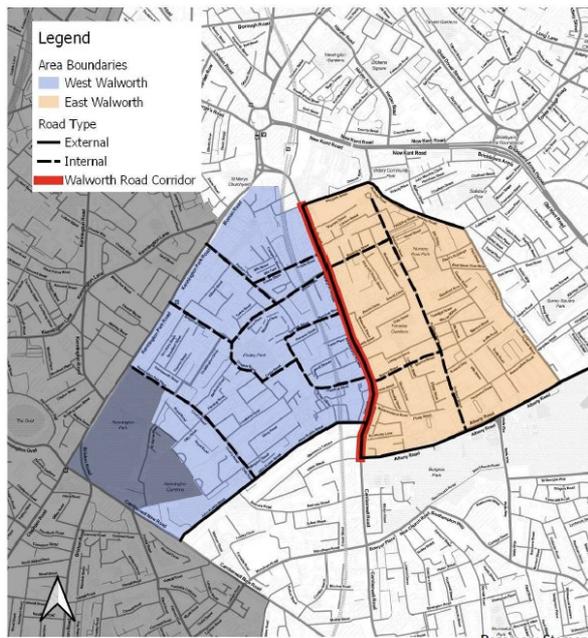
The consultation and results of traffic monitoring and pollution monitoring will be published same time as this report by Southwark Council. The following are the results of the monitoring exercises:

Traffic monitoring

Traffic monitoring data has been collected by Systra, commissioned to produce an independent traffic monitoring report on behalf of London Borough of Southwark. The latest monitoring report compares the situation in June 2021 with equivalent figures in 2019.

Eighteen (18) Automatic Traffic Counters (ATCs) have been installed from June 2020, and data collected to June 2021.

Results should be considered in the context of overall traffic levels being down -8% across all of Southwark between June 2021 and June 2019.



Streets where measures implemented restrict or prevent through traffic are defined as **internal**, whilst those with no change has been made to throughflow are defined as **external**

Pre implementation situation: Cars, LGVs and HGVs

- Traffic flows were generally low on internal roads. The highest flows were on Browning Street at over 5,800 vehicles per day.
- High flows were recorded on Walworth Road (8,500 vehicles/day), and John Ruskin Street (5,800-6,800 daily vehicles).
- Highest flows were recorded on Camberwell Road (13,891) and Albany Road (15,659)

- HGVs followed a similar pattern to car and LGV flows, low on internal roads and higher on external roads. Walworth Road had highest volume of HGVs (1,950 per day) Flows were also high at Rodney Road, both possibly due to construction in Elephant Park.

Post implementation traffic monitoring findings (June 2021)

The following is a summary of the traffic monitoring:

- The overall volume of motor traffic recorded across all streets has decreased by **-16%**
- The volume of motor traffic counted on internal streets has decreased by **-40%** in the West Walworth area and **-53%** in the East Walworth area.
- Largest decreases on Carter Street (**-70%**) and on Merrow Street (**-80%**)
- John Ruskin Street East flows have decreased **-4%**
- On external streets, volumes have increased by **+7%** in the West Walworth area and decreased by **-7%** in the East Walworth area.
- Increased traffic on Walworth Road North (+21%) and on access roads such as Penrose Street and Fielding Street, with increases of +45%.
- The volume of motor traffic counted on the Walworth Road Corridor has increased by **1%**.
- HGV flows have increased on some sites. The largest increase was recorded on John Ruskin Street West (+26%), equating to 107 daily HGVs.
- Flows have also increased on Brandon Street (+17%), Camberwell Road (+9%) and Amelia Street (+7%).
- The largest decrease in HGVs has been recorded on Merrow Street (-80%).

Streets where total motorised traffic has DECREASED from June 2020 to June 2021

- Albany Road - 9%
- Amelia Street - 04%
- Braganza Street - 63%
- Brandon Street - 30%
- Browning Street - 69%
- Carter Street - 78%
- Kennington Park Place - 41%
- Manor Place - 48%
- Merrow Street - 77%
- Penton Place - 60%
- Portland Place - 22%
- Rodney Road - 10%
- Camberwell Road - 6%

Streets where total motorised traffic has INCREASED from June 2020 to June 2021

- Fielding Street + 3%
- John Ruskin Street (East) + 3%
- John Ruskin Street (West) + 27%
- Penrose Street + 18%
- Walworth Road +11%

Cycling monitoring

Cycle movements have been separately analysed using Active Movement Sensors

Impact on cycle traffic needs to be seen in the overall context of London where annual cycling stages per person increased by 23% and annual miles cycled per person increased by 62% in 2020 compared to 2019, though flows are reverting to pre-Covid levels in 2021.

- Across all roads, cycle volumes have increased by **+34%**
- Highest increases are in West Walworth, external roads by **+129%** and internal roads by **+53%**.
- High increase recorded on John Ruskin Street East and West (**+125% and +132%** respectively).
- The Walworth Road Corridor shows an increase of **+10%** in cycle flows
- A decrease in cycle flows has been seen on Albany Road (**-24%**) and on Camberwell Road (**-4%**).
- The volume of cycles on internal streets has increased by **+53%** in the West Walworth area and **+43%** in the East Walworth area.

Vehicle speeds

Vehicle speeds have not changed much. Whilst some variation has been observed, in general this has been very low, or related to low vehicle flows. Some sites where greater changes have been recorded are:

- **John Ruskin Street:** Vehicles travelling over the posted speed limit dropped from 68% to around 30%, with average speeds dropping from 22mph to 18.5mph.
- **Brandon Street:** The average speed of vehicles increased from around 10mph to 15mph.
- **Walworth Road:** The average speed of vehicles decreased very slightly (20mph to 19mph), with minimal change in the % of vehicles travelling over the posted speed limit.
- **Manor Place:** Average vehicle speeds have steadily dropped, from 17.7mph pre implementation to 15.8mph in June 2021.

Change in bus journey times (June 2021)

Bus journey time monitoring shows that bus speeds within Southwark significantly increased in the first lockdown, and again in the second, before slowly returning towards pre-COVID levels. Bus journey time analysis shows an improvement (decrease) or no change in journey times along some peripheral roads including Walworth Road southbound, Kennington Park Road and Albany Road (eastbound).

Bus journey times that have decreased (improved) or remained the same

- Kennington Park Road: decreases in journey times in both directions.
- Carter Street experienced a decrease in journey time in only one direction.
- Walworth Road southbound have improved since April 2021, now only showing limited change from pre implementation.
- Kennington Park Road, Heygate Street and Carter Street all experienced decreases in journey times, which were significant in at least one direction.
- Heygate Street eastbound bus journey times have decreased.

Bus journey times that have increased (i.e. made worse)

- Albany Road: an increase in journey times westbound although no notable change eastbound.

9. Potential equality impacts of the Southwark Streetspace measures

The analysis identified the following Protected Characteristic Groups that are relevant for assessment in this study. These are Age, Disability, Gender, Pregnancy/ Maternity and Race. Levels of deprivation and income levels are also considered.

TfL's data for London (*Travel in London: Understanding our diverse communities, TfL 2019*) is used as an indicator for travel methods used by Southwark's residents. This may not be fully accurate but is the best data available.

Protected Characteristic: Age

- TfL data indicates walking is the most frequently used type of transport by older Londoners aged 65 years and over (87% walk at least once a week). Using a bus is the next most commonly used mode.
- Improving the walking and cycling environment by reducing vehicle movements has the potential to create a safer environment, benefiting older people who are more likely to be pedestrians. Safer streets may encourage more older people to cycle, as borne out by consultation responses and monitoring of cycle flows.
- Bus filters prioritise bus users. These impacts may benefit those aged 65+, who are more reliant on buses.
- Both younger and older age groups are more vulnerable to poor air quality and traffic collisions. For young children negative air quality can lead to reduced lung development and for older people this can lead to a range of long-term health problems²⁰. The GLA Air Quality in London study 2016 -2020 (Table 8)²¹ shows that air quality in Southwark on Old Kent Road bordering the Walworth area exceeded the recommended WHO maximum of 20 µgm-3 for PM10 particulates.
- Motor traffic restrictions are likely to make certain private car journeys more indirect and longer. This may disproportionately affect those in the younger 65+ age category who rely on cars more than other age groups. Driving levels drop as people get older.
- Careful monitoring continues to be needed to ensure benefits in one area do not bring disbenefits on boundary roads and neighbouring streets due to potential traffic displacement.

Protected Characteristic: Disabled people

This indicates:

- Disabled Londoners are more likely to walk (81%) and use buses (58%)
- Disabled Londoners are slightly less likely as to use a car as a passenger (42%) and much less likely to use a car as a driver (24%) compared to Londoners overall (45% and 53% respectively).

²⁰ Understanding the Health Impacts of Air Pollution in London, Kings College London, TfL and GLA, 2015

²¹ Air quality in London Impact Evaluation, (Table 8), 2016-2010, GLA, October 2020

- Buses provide a more accessible form of public transport than rail or Underground for disabled people. Bus journey times will need to be monitored to ensure minimal delay causing stress and inconvenience.
- Disabled people are five times more likely to be injured by a motor vehicle than non-disabled people²². Evidence indicates area-wide traffic restriction schemes reduce injury risks across all groups inside the neighbourhood, without negative impacts at the boundary²³.
- Traffic noise additionally increases the risk of stroke and premature death²⁴. Any measures reducing traffic injury risk and traffic noise would benefit disabled and older people.
- Those disabled people who use a car as a passenger and those who drive would be disadvantaged. The Streetspace scheme restrictions increase car journey times and make the journey more complex and potentially unfamiliar, thereby increasing stress levels. This includes those disabled people who use Motability and have adapted vehicles for their use.
- The Streetspace scheme will potentially benefit those with disabilities who use the street on foot, particularly those with mobility impairments that require mobility aids as more safe space will be created, less affected by traffic speed and pollution.
- Existing streets are not always accessible or easy for walking and cycling. Restriction of motor traffic needs to go hand in hand with improving the accessibility of the street environment including removing footway obstructions and clutter, ensuring pavements are smooth, level and firm, providing adequate safe crossing points with dropped kerbs and tactile paving. It is recommended that street accessibility audits are carried out.

Protected Characteristic: Sex and Pregnancy/Maternity

- Transport for London data (2019) indicates walking is the most commonly used type of transport by women (95% walk at least once a week).
- Women are more likely to use buses than men (62% compared with 56%).
- Women are more likely than men to be travelling with buggies and/or shopping, and this can affect transport choices.
- Women are less likely than men to drive at least once a week (33% compared with 42%). However, they are more likely to be a car passenger (51% compared with 37% of men).
- Women are less likely to cycle than men: 22% of men cycle in London compared with 13% of women.
- Women as car passengers or drivers are likely to be negatively impacted by longer car journeys.
- Making walking safer by reducing levels of motor traffic will potentially benefit women in particular as it is most commonly used mode of transport; it will also encourage parents to accompany children to school on foot.
- More women may be encouraged to take up cycling with a safer environment created.

²² Inequalities in self-report road injury risk in Britain: A new analysis of National Travel Survey data, focusing on pedestrian injuries, Journal of Transport and Health, Rachel Aldred, June 2018

²³ [The Impact of Introducing Low Traffic Neighbourhoods on Road Traffic Injuries | Published in Transport Findings, 2021](#)

²⁴ Road traffic noise is associated with increased cardiovascular morbidity and mortality and all-cause mortality in London, European Health Journal, June 2015

Protected Characteristics: Race

TfL data (2019)²⁵ indicates:

- Walking and travel by bus are the most commonly used types of transport by Black, Asian and Ethnic Minority Londoners. (96% of walk at least once a week compared with 95% of white Londoners.) Black Londoners using the bus at least once per week is significantly higher at 73%.
- The use of cars among Black, Asian and Ethnic Minority Londoners is lower than for white Londoners; 32% of drive a car at least once a week compared with 41% of white Londoners (33% and 43% respectively in 2013/14).
- Cycling levels of Black, Asian and Ethnic Minority Londoners and white Londoners are very similar..
- The measures are likely to improve conditions for pedestrians, by reducing motor traffic and therefore conflicts with motorised vehicles. This will potentially benefit groups who are more likely to walk.
- Improvements for pedestrians will also benefit those groups who are more likely to use public transport, as they are likely to walk to/from the nearest public transport stop.
- Improved safety and space for cycling is likely to benefit Black, Asian and ethnic minority Groups as it will encourage more cycling by ethnic groups that are currently less likely to cycle.
- Motor traffic restrictions reduce road traffic injury risk. London's Black children are more at risk from pedestrian injury than white or Asian children, while Black Londoners are less likely to own cars than white or Asian Londoners. Streetspace measure may help redress these inequalities and provide safer environments and public space for those most disadvantaged by the current situation.
- This will only benefit groups living within the traffic restricted zones. Those living on boundary roads or neighbouring streets are potentially disadvantaged by increased motor traffic displacement. This needs to be carefully monitored.

Streetspace measures impact on people with low-income levels

TfL data (2019) indicates:

- Women, disabled people, Black, Asian and Ethnic Minority Londoners and older people are more likely to live in low-income households than other Londoners
- The most common type of transport used by Londoners on lower incomes is walking (93% walk at least once a week).
- The bus is the next most common type of transport used by Londoners on lower incomes (69% use the bus at least once a week, compared with 59% of all Londoners)
- Londoners with lower household incomes are less likely to use a car (both as a driver and passenger), (23% compared with 38% overall. 21% of all Londoners drive at least five days a week compared with 13% of Londoners living in a household with a lower income

²⁵ *Travel in London: Understanding our diverse communities* A summary of existing research, Mayor of London, TfL, 2019

- Londoners in low-income households are less likely to cycle. Eight per cent sometimes used a bike to get around London in the past year compared with 17% of all Londoners.
- Crime levels are disproportionately high in the Walworth area, affecting particularly, low-income communities. Traffic schemes have the potential to lower crime levels. Evidence²⁶ shows a 10% decrease in total street crime after introduction of a Low Traffic Neighbourhood (LTN) in Waltham Forest, and 18% decrease after 3 years. An even larger reduction was observed for violence and sexual offences, the most serious subcategory of crime.
- Social impact: More people on the streets means that there can be more social cohesion – people meeting up to socialise and chat, or feeling confident for their children to cycle or walk on the streets²⁷
- Evidence suggests living in a Low Traffic Neighbourhood increases the amount of walking and cycling people do, making them healthier. A study²⁸ from Waltham Forest traffic schemes found residents increased walking (115 mins/week) and cycling (20 mins/week) relative to people living elsewhere in Outer London. Car ownership decreased by 7% after 3 years, relative to the control group. There was no increase in emergency service response times and a 18% reduction in crime after 3 years. There was also a 75% reduction in road injury collision risk.
- The measures are likely to improve conditions for pedestrians, by reducing conflicts with motorised vehicles. This will benefit low-income groups who are more likely to walk and less likely to own a car.
- Improvements for bus movements are also likely benefit these groups who are more likely to use buses.

²⁶ The Impact of Introducing a Low Traffic Neighbourhood on Street Crime, in Waltham Forest, London, Jan 2021

²⁷ Driven to excess: Impacts of motor vehicles on the quality of life of residents of three streets in Bristol UK and For good neighbours, live in a quiet, car-free street

²⁸ Low traffic neighbourhoods and population health, BMJ, Feb 2021

10. Conclusions and recommendations

This report has examined the implementation of Streetspace measures in Walworth using Emergency Traffic Management Orders and legislative duties placed on Southwark Council under the Equality Act 2010.

It should be noted that the outcome of this EQIA report is work in progress, the start of a process of co-evaluation of the scheme with residents, Southwark Council and relevant stakeholders. A traffic scheme can take three or four years to bed in and establish itself before any permanent change in behaviour or traffic pattern is observed and clear evidence obtained.

The monitoring reports show some of the aims of the measures are on track such as an uptake in cycling and a reduction of traffic across the area. However, the consultation feedback from residents from protected groups were against the Streetspace measures in Walworth. Within the feedback it is worth noting that

- some of the perceived impacts reported in the consultation such as negative impact on air quality, increased traffic on boundary roads and longer bus journeys were not evidenced in the monitoring reports with negligible or marginal increases. Southwark Council will need to continue working with protected groups to share monitoring reports and mitigate the impacts of the experimental measures if they are kept.
- People who responded to the consultation were predominantly car owners who perceived they were negatively impacted by the traffic restrictions. It should be noted that older, disabled, Black, Asian and Minority Ethnic people and those on lower incomes are less likely to be car owners²⁹, and more likely to walk and use public transport.

The recommendations below are aimed to advance equality and mitigate against reported and potential negative impacts on protected groups of the Walworth Streetspace measures.

Within the scheme areas:

- Streetspace measures primarily increase safe space for pedestrians. This will not only benefit those making trips entirely on foot but will also benefit the large share of trips made by public transport, given the likely need to access public transport stops by walking. This will particularly benefit those groups who are more reliant on walking, such as those as 65+³⁰, as well as those who may find narrow and cluttered footways particularly difficult to negotiate such as disabled people or people walking with prams.
- Streets with less motor traffic will be safer for cycling, and will potentially encourage more people to cycle, including children, older and disabled people.
- There are likely to be some negative impacts on residents travelling by car, as routes will be indirect, potentially more complex, and longer. This is likely to have a particularly

²⁹ *Travel in London: Understanding our diverse communities* TfL, 2019

³⁰ *Travel in London: Understanding our diverse communities* TfL, 2019

negative impact on disabled and older people who are reliant on cars due to mobility and other impairments.

Overall impact of Streetspace measures on the wider area

- The potential impact of displaced motor traffic causing congestion, pollution and danger on main and boundary roads could detract from the positive impacts, and this needs to be carefully monitored at regular intervals.
- Main roads may themselves need to be evaluated to increase spaces for buses, walking and cycling to encourage modal shift to these modes for those who are able to do so.

Recommended actions

1. Continued engagement with protected groups in particular, older, disabled and Black, Asian and Minority Ethnic people's representatives to ensure that their concerns are being heard, understood and addressed. It is good practice to establish an 'Access Panel' to work collaboratively with Southwark Council to mitigate any negative impacts and enhance positive impacts. This panel can also input into future schemes.
2. Active travel should be accessible travel for all. The involvement of disabled people is crucial to inform the design of these and future traffic calming measures. Barriers to walking and cycling within the existing street environment should be addressed. The public consultation indicated that the street environment in Walworth is not conducive for walking in many areas – many obstructions such as bins and overgrown planting, poor surfaces, lack of seating; pedestrian crossing times provided are too short and many do not have audible signals; motor traffic idling increases pollution and makes walking more difficult. Disabled people often feel excluded from exercise and active travel. A street accessibility assessment is recommended to identify barriers to active travel. The audit can also identify areas of potential conflict between cyclists and pedestrians and make recommendations on providing more seating.
3. Continued effective monitoring by Southwark Council of;
 - motor traffic levels
 - Active travel: walking, and cycling levels
 - bus journey times
 - school bus journey times

Monitoring reports should include a breakdown of impact on protected groups.

4. Extension of the Blue Badge exemption across the borough to allow holders to reach essential or specialist services more easily round the borough.
5. Provide good signage and maps to assist people who need to drive to navigate detours and unfamiliar routes. This would help shorten delays and ameliorate anxiety and stress.
6. Ensure that Dial-a-Cab, taxi and private hire drivers are aware that they can access all streets for the purposes of dropping-off and picking up passengers with particular care to

be taken with disabled and vulnerable people. This could include creating maps for distribution to drivers, as well as engagement through TfL Taxi and Private Hire (TPH) and trade associations.

7. Better provision of accessible facilities at local shopping centres including suitable accessible car and cycle parking for disabled people, accessible toilets and consideration of an adult Changing Places toilets.
8. Spaces around schools to be prioritised to promote active travel by children and low traffic pollution levels.
9. Greater awareness of and provision of targeted cycle training and cycle storage to make it easier for those protected groups who are able to cycle.
10. Liaison with neighbouring boroughs to address problems on boundary streets, including
11. Further engagement with essential workers, private transport hire and night-time workers, needs to be considered to mitigate impact on their travel modes
12. Interventions should consider the differential deprivation levels within the Borough and prioritise areas of higher deprivation, as Streetspace schemes can particularly benefit people living without access to private green space or local safe public spaces for playing and socialising. Streetspace measures can make residential streets safer for play, socialising, and exercise. This is particularly important in areas with overcrowded housing and without private green space. Increased walking, cycling and meeting people socially outdoors are expected to benefit mental and physical health.

11. Addendum to CAE report effective 6 January 2022

This report is updated with results of the second [Monitoring Report](#), the [Consultation Report](#) on the scheme and the [amended Walworth Streetspace scheme](#) as follows:

Monitoring Report

A [second Monitoring Report](#) by Systra, on behalf of London Borough of Southwark, reviewed the impact of the trial Streetspace measures implemented in Walworth between July and October 2020, based on data up to September 2021 compared to pre-pandemic June 2019 data. This indicates:

- Overall motor traffic levels have fallen by 18% across the whole area, which hugely benefits older and disabled people who walk, cycle and take buses.
- Volume of motor traffic on internal streets decreased significantly by 44% in West Walworth and decreased by 54% in the East Walworth area.
- On external streets traffic volumes increased 4% in West Walworth but decreased by 8% in the East Walworth area. The volume of traffic on the Walworth Road Corridor decreased by 2%.

- An area of concern is raised levels of motor traffic on some streets such as John Ruskin Street.
- Cycling volumes across the area have increased by 26%. Cycling journeys on internal streets increased by 41% in West Walworth and 48% in the East Walworth area. On external streets these have increased by 98% in West Walworth and decreased by 17% in the East Walworth area.
- Bus journey times showed minor changes or improvements, with increase in journey times on Albany Road westbound. As many older and disabled people use buses^[1], bus journey times need to be further improved on all routes.

Consultation Report

A [Consultation Report](#) has also been published on the Walworth Streetspace scheme based on an extensive public consultation exercise between 12 July and 19th September 2021 by the London Borough of Southwark. This indicates:

- Many older people had concerns about some of the impacts of the Streetspace measures
- People with disabilities were somewhat less likely to support the aims of the Streetspace measures. Disabled people, particularly those with physical disabilities or long-term health conditions, which made up the majority of disabled respondents, are more likely to rely on motor vehicle travel, and less likely to use a bicycle or scooter.
- Black, Asian and Minority Ethnic respondents were marginally more likely to be car owners, and significantly more likely to express a preference for the roads to be returned to how they were before the changes.

In all cases a very clear pattern can be observed – respondents from households with no motor vehicle were overwhelmingly more likely to prefer to retain the measures, those with one or more motor vehicle were overwhelmingly likely to prefer to remove the measures and return the road to how it was before

It is noted that snapshot surveys carried out at locations across Walworth and a school gates showed a more positive response to the Streetspace measures across all groups.

Consultation responses are of their nature self-selective and it is recommended that independent opinion polls are carried out from a representative sample of the Walworth population.

Amendments to scheme

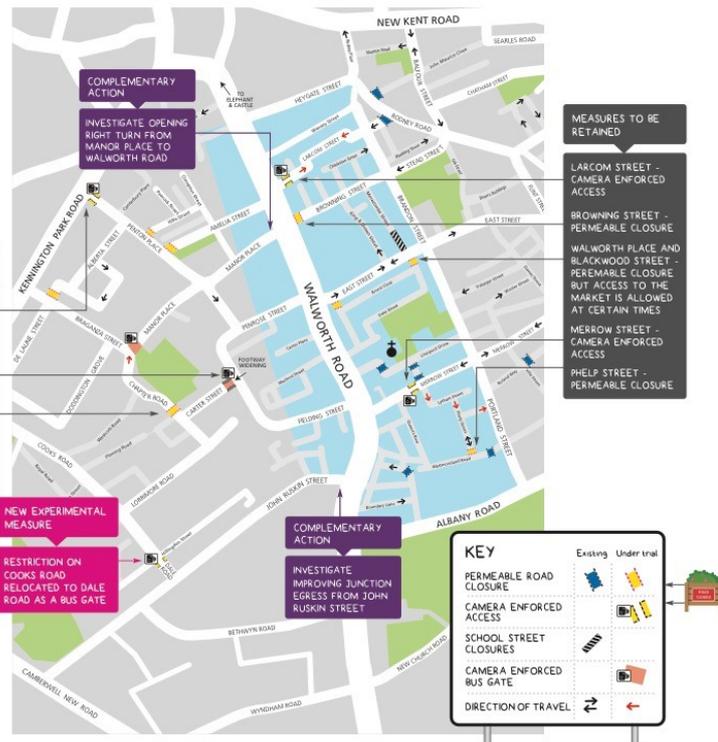
Following issue of the final EQIA on 1 November 2021 London Borough of Southwark have amended the Streetspace measures as outlined below published on the council website [here](#).

Our healthy Walworth Streetspace Proposal

Key issues addressed

- ✓ Allow access for emergency vehicles
- ✓ Use map-based signs for advance signage
- ✓ Exemptions to be provided (see table below)
- ✓ Measures to improve local access:
 - Investigate opening right turn from Manor Place to Walworth Road
 - Improve egress from John Ruskin Street to Walworth Road
 - Relocate restriction from Cooks Road to Dale Road as an experimental measure. This will improve westbound access
- ✓ Continue to monitor impact of the measures, share data and engage with the community
- ✓ Work with the community to transform the street space at Browning Street, Amelia Street and Riberto Street, for the community to enjoy and to support local businesses
- ✓ John Ruskin Street and the area bounded by Camberwell New Road and Camberwell Road - Further engagement with the community to discuss possible traffic reduction and improvement measures

Location	Signage	Restrictions	Exemptions
Merrow Street Larcom Street Penton Place		24/7	Buses Taxis (Hackney Carriage) Rapid response health care workers Southwark blue badge holders SEND vehicles Emergency services Refuse vehicles
Manor Place Dale Road Carter Street		24/7	Buses Any 9 seats or more vehicle Taxi (Hackney Carriage) Rapid response health care providers Southwark blue badge holders SEND vehicles Emergency Services Refuse vehicles



These amendments will mitigate some of the negative impacts on protected groups (as recommended in Section 10 of this report). The amended proposals will:

- assist Blue Badge holding drivers, emergency service vehicle drivers, rapid response health care workers, refuse vehicles, taxis, 9-seater vehicles, and those assisting disabled people and students with Special Educational Needs by allowing exemptions through camera enforced restrictions.
- All drivers will benefit from map-based signs for advance signage. particularly older and disabled motorists, who find it more difficult to read signs.
- The proposed transformation of the street space at Browning Street, Amelia Street and Alberta Street in conjunction with the community for the benefit of people walking and cycling will support all including local businesses.
- Southwark propose measures to improve local access for all car drivers will be investigated, including allowing better access from Manor Place and John Ruskin Street to Walworth Road and relocating the existing restriction from Cooks Road to Dale Road. This will relieve some of the increased motor traffic on John Ruskin Street and improve car drivers' access to the west.
- Southwark has committed to further community engagement to discuss traffic reduction and improvement measures at John Ruskin Street and the area bounded by Camberwell New Road and Camberwell Road will mitigate specific areas of concern raised by traffic monitoring and the consultation.

Recommendations

The recommendations in Section 10 which include continued engagement with protected groups, bus journey time monitoring, and improvements to the public realm for pedestrians, wheelchair users, disabled people and cyclists would further mitigate impacts of Streetspace measures on protected groups.

It is also recommended that independent opinion polls are carried out from a representative sample of the Walworth population, including adequate representation from protected groups.

12 Appendices

Appendix 1 Streetspace measures – evidence from similar schemes

A number of studies have looked at the impact of Streetspace measures across London including previous and more recent motor traffic restriction measures. Some of these are summarised here.

Equity impact on deprived areas of location of new Streetspace measures

A spatial analysis of new traffic measures that was conducted in February 2021³¹, concludes that modal filters implementation has been broadly equitable at the city level and at the micro level. Deprived areas in London are considerably more likely than affluent neighbourhoods to receive new Streetspace measures as in the table (from the study) below.

Table 3: Alternative comparison of deprivation metrics by district: mean deprivation percentile inside versus outside LTNs

	A: mean deprivation percentile inside LTN	B: Mean deprivation percentile outside LTN	Difference A minus B
Enfield	24%	62%	-37%
Greenwich	32%	60%	-27%
Lewisham	48%	66%	-17%
Ealing	41%	55%	-14%
Hammersmith & Fulham	47%	53%	-6%
Sutton	25%	29%	-4%
Newham	70%	74%	-4%
Waltham Forest	59%	61%	-2%
Islington	66%	67%	-1%
Hounslow	52%	51%	0%
Hackney	80%	79%	2%
Lambeth	65%	62%	3%
Merton	35%	31%	4%
Camden	52%	47%	6%
Southwark	72%	63%	9%
Harrow	43%	32%	11%
Tower Hamlets	82%	68%	14%
Croydon	71%	51%	19%
Westminster	67%	46%	20%
Brent	81%	60%	20%

Deprivation percentiles are calculated by ranking each LSOA from 0 to 100 across London as a whole, with 100 corresponding to the highest level of deprivation.

³¹ Equity in new active travel infrastructure: a spatial analysis of London's new Low Traffic Neighbourhoods, February 2021

Across London as a whole, people in the most deprived quarter were 2.7 times more likely to live in a new modal filtered area, compared to Londoners in the least deprived quarter.

Response of disabled people to recent Streetspace measures in London (*Pave the Way, Transport for All, Jan 2021*)

The disabled people's charity, Transport for All, conducted a survey of disabled people affected by traffic restriction measures across London and came to the following conclusions, summarised in their report *Pave the Way*³²:

Negative impacts of measures

These include:

- Lack of consultation and information about implemented measures has led to dissatisfaction and confusion.
- Longer car journey times for residents, as well as their visitors who provide care and support. This leads to travel becoming more exhausting, expensive, complicated or difficult with negative impacts on mental health. Taxi journeys are also more difficult with drivers unwilling to take the circuitous routes and journeys being more expensive.

Positive impacts of measures

Many disabled people experienced genuine and meaningful benefits from the LTNS including:

- easier or more pleasant journeys.
- an increase in independence.
- a decrease in traffic danger and
- benefits to physical and mental health.

The conclusion is that ripping out the traffic restrictions measures and returning to normal isn't the solution either. "Normal - what we had before was not accessible enough either".

The most immediate barrier facing disabled people to make active travel journeys is the inaccessibility of the street (footways and cycle paths). For walking journeys this includes:

- Obstructed footways cluttered with obstacles – bins, car charging points, signs and A- boards, dock-less cycles and scooters left on the footway.
- Footways that are steep, uneven, and bumpy are difficult to traverse in a wheelchair.
- Lack of dropped kerbs at side road junctions and to cross the street. Sometimes kerbs are too high for mobility impaired people to step up or down to.
- Lack of seating and shelter means people are unable to stop and have a rest.
- Confusing layouts with too many bollards, space shared with other modes and poor signage.
- Crossings with no tactile warnings or dropped kerbs and obstructed by signs and clutter.

Pave the Way report recommendations include:

- Engaging with and listening to the perspectives of disabled people.
- A series of immediate measures and long-term solutions to address the many barriers that disabled people face to Active Travel.
- Encourage walking, wheeling and cycling; and create an accessible public transport system as a viable alternative to car use.

³² *Pave the Way: The impact of low traffic neighbourhoods on disabled people, and the future of accessible ravel*, Transport for All, January 2021

Evidence on impact on levels of active travel, injury risk and street crime

Evidence from post-implementation survey in 2020³³ from similar motor traffic restriction measures undertaken in the London Borough of Waltham Forest three years earlier, found that these were associated with more active travel, reduced car ownership, lower road injury risk, and reduced street crime. The survey found that:

- Residents increased their walking and cycling relative to people living elsewhere in Outer London (by 115 minutes for walking and 20 minutes for cycling after three years);
- Levels of car or van ownership decreased by 7% after three years.

Additional research found

- no increase in emergency service response times,
- an 18% reduction in street crime after three years, and
- a 75% reduction in the risk of being injured in a road traffic collision within modal filtered areas.

How motor traffic has affected residential streets compared to main roads in London

Data from the London Travel Demand Survey 2017/8 to 2019/20 and quoted in a study³⁴ on impact of Streetspace measures, indicates that the majority (around 90%) of Londoners live on residential streets rather than in main roads or high streets (around 5% each) which are usually outside Streetspace schemes.

London's residential (minor) streets have seen an increase of 72% in motor traffic over the past decade, while traffic on its major roads fell by 3% (DfT, 2020). This is often attributed to the rise in satellite navigation use among drivers over the past decade which allows them to bypass main roads and use residential short cuts.

The need to reduce through motor traffic through residential streets provided an additional justification for Streetspace schemes, introduced during Covid-19 in the UK capital through emergency provisions allowing expedited implementation with concurrent consultation.

Studies show that differences between residential street and main road/high street residents by age group, income group, ethnic group, and disability status are relatively small, and apply more to outer than to inner London. Therefore, implementing Streetspace schemes in itself is not likely to pose major social equity issues (by benefiting those living on residential streets more than those living on main roads).

However, it is important that the 5% of residents living on main roads and the 5% of residents living on high streets also benefit from improvements that reduce the impact of motor traffic and increase their access to safe and pleasant active travel options.

Evidence of traffic evaporation

Evidence from previously implemented similar motor traffic reduction schemes reveals that fears of traffic displacement problems almost always fail to materialise, and that significant reductions in overall

³³*The Impact of Low Traffic Neighbourhoods on Active Travel, Car Use, and Perceptions of Local Environment during the COVID-19 Pandemic*, Aldred and Goodman, 2020

³⁴*LTNs for all? Mapping the extent of London's new low traffic neighbourhoods: a report by Possible and the Active Travel Academy*, Aldred R, Verlinghieri E. 2020.

motor traffic levels across an area can happen as a result of people making a wide range of behavioural responses to the new traffic configurations³⁵.

The most comprehensive study³⁶ of the phenomenon of disappearing or “evaporating” traffic was carried out by Sally Cairns, Carmen Hass-Klau, and Phil Goodwin in 1998 and followed up in 2002.

This brought together experience from 70 case studies of road space reallocation from general traffic, across 11 countries, with opinions from 200 transport professionals. It shows that traffic does not behave like water moving through pipes, finding an easier path as another narrows. Instead it is a force of human choice, driven by people making all sorts of different decisions when driving conditions change. The respondents in the Cairns study, for example, changed their mode of travel, chose alternative destinations, or the frequency of their journey, consolidated trips, took up car sharing or didn't make the journey at all.

In half of the case studies, there was a 11% reduction in number of vehicles across the whole area where road space for traffic was reduced, including the main roads.

This research shows that motor traffic restriction schemes do not simply shift traffic from one place to another but lead to an overall reduction in the numbers of motor vehicles on roads. In Waltham Forest this meant there were considerable reductions on streets within the neighbourhood – some streets have seen 90%+ reductions in motor traffic and 56% on average. On the surrounding roads there have been increases, but they have not taken all the displaced traffic³⁷.

King's College London research³⁸, based on modelling work where traffic volume is used as one of the inputs to determine air quality, suggests that there has not been a decrease in air quality on main roads following introduction of LTNs.

Relationship of car traffic and population health

A BMJ report¹³ in Feb 2019 *Low traffic neighbourhoods and population health* reported that car use harms health, the environment, and society in many ways;

- Motor traffic is a major contributor to air pollution, which is estimated to cause 28,000-36,000 deaths in the UK annually.
- Traffic noise pollution is an under-recognised health harm, associated with increased risk of stroke and premature death.

³⁵ Evaporating traffic? Impact of low-traffic neighbourhoods on main roads, article by Emma Griffin, London Living Streets, July 2019 <https://londonlivingstreets.com/2019/07/11/evaporating-traffic-impact-of-low-traffic-neighbourhoods-on-main-roads/>

³⁶ Disappearing traffic? The story so far, S Cairns, S Atkins and P. Goodwin, https://nacto.org/wp-content/uploads/2015/04/disappearing_traffic_cairns.pdf

³⁷ Walthamstow Village area wide scheme: 2020 Comparison of vehicle numbers before and after the scheme and during the trial <https://enjoywalthamforest.co.uk/work-in-your-area/walthamstow-village/comparison-of-vehicle-numbers-before-and-after-the-scheme-and-during-the-trial/>

³⁸ Air Quality: concentrations, exposure and attitudes in Waltham Forest, David Dajnak, Heather Walton, Gregor Stewart, James David Smith and Sean Beevers, 2020

- Car travel increases sedentary time and is a major opportunity cost in terms of the physical and mental health gains that could have been achieved by walking or cycling instead.
- In 2019, 1,752 people were killed by vehicle collisions in Great Britain, with another 25,945 seriously injured.

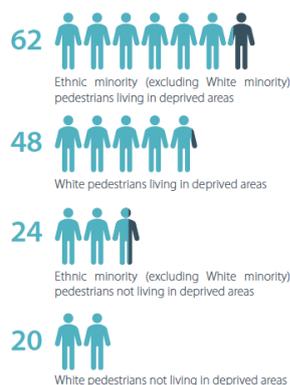
Research has shown how **negative impacts of motorised transport are usually unevenly distributed**, with vulnerable communities disproportionately affected by transport-related air pollution, traffic collisions and ill-health due to lack of exercise.

Road safety relevance to ethnic minorities and low-income households

A recent study by Agilysis and Living Streets, *Road traffic and injury risk in ethnic minority populations*, May 2021 showed that deprived ethnic minority pedestrians are over three times more likely to be a casualty on Britain's roads than White non-deprived pedestrians. Ten years of police reported personal injury collision data from Great Britain was analysed to identify correlations between risk and community deprivation and ethnicity.

The findings show that deprivation plays a significant role in the likelihood of a pedestrian being injured in a collision, and that being from an ethnic minority plays an additional part.

The annual pedestrian casualties per 100,000 were:



Impact of Introducing Low Traffic Neighbourhoods on Road Traffic Injuries

Another recent study in January 2021³⁹ on the impact of introducing low traffic neighbourhoods on road traffic injuries examines the impact on road traffic injuries of introducing low traffic neighbourhoods in Waltham Forest, London.

Using Stats19 police data 2012-2019, they find a three-fold decline in number of injuries inside low traffic neighbourhoods after implementation, relative to the rest of Waltham Forest and the rest of Outer London.

They further estimate that walking, cycling, and driving all became approximately 3-4 times safer per trip. There was no evidence that injury numbers changed on boundary roads. Their findings suggest that low traffic neighbourhoods reduce injury risks across all modes inside the neighbourhood, without negative impacts at the boundary.

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Appendix 3 Legislative Context

The Equality act 2010

Part 3 of the Equality Act 2010 covers the duties for service providers and public functions. These measures were initially legislated for in the Disability Discrimination Act 1995, as amended by the Disability Discrimination Act 2005, and the Regulations made under it.

The Disability Discrimination Act 1995 (DDA) made it unlawful for service providers to discriminate against disabled people in certain circumstances. From 1 October 2004 service providers had to take reasonable steps to remove, alter or provide a reasonable means of avoiding, a physical feature which made it impossible or reasonably difficult for disabled people to use a service.

On 1 October 2010, the Equality Act 2010 (EA) replaced most of the DDA. The duty on providers of goods, services and facilities was replaced with a duty to make **reasonable adjustments**⁴⁰ in order to avoid a disabled person being placed at a **substantial disadvantage**⁴¹ compared with non-disabled people when accessing services and facilities.

The EA replaced all previous anti-discrimination laws (nine major pieces of legislation and over 100 smaller pieces of legislation) including the DDA and protects people with the following nine 'protected characteristics':

- 1) Disability
- 2) Age
- 3) Gender Reassignment
- 4) Pregnancy and Maternity (including breastfeeding)
- 5) Marriage and Civil Partnership
- 6) Race
- 7) Religion or belief
- 8) Sex
- 9) Sexual Orientation

⁴⁰ The EA does not prescribe what a reasonable adjustment might be – this is to be determined by the particular circumstances in each case.

⁴¹ Anything that is more than minor or trivial

The principles of access to the built environment remains largely unchanged and the terms “DDA”, “DDA regs” and “DDA compliant” are still widely used and generally interpreted as pertaining to access for disabled people even though the legislation is subsumed into the Equality Act.

Duties under the Equality Act

The following information focuses on the law with regard to treatment of disabled people but may also apply to some of the other protected characteristics.

The Act contains provisions on direct discrimination, harassment and indirect discrimination. The law protects anyone who has, or has had, a disability. All service providers⁴² must treat everyone accessing their goods, facilities or services fairly, regardless of any protected characteristic (e.g. age, gender, race, sexual orientation, disability, etc.), and should guard against making assumptions about the characteristics of individuals.

Service providers also have an obligation to make reasonable adjustments to help disabled people access their goods, facilities and services. The legal duty to make reasonable adjustments applies only for disabled people, and not to people with other protected characteristics.

Discrimination can arise if:

- A disabled person is treated less favourably, is provided with a lower standard of service or is refused service
- Reasonable adjustments to the delivery of a service have not been made in order to allow disabled people to use them

Different treatment can sometimes be justified and will be lawful if it can be shown that it is intended to meet a legitimate objective in a fair, balanced and reasonable way. This means that a service provider must strike a careful balance between the negative impact of a provision on the disabled person and any lawful reason for applying it.

What is ‘reasonable’ will depend on a number of circumstances, including the cost of an adjustment. The Equality Act 2010 requires that service providers must think ahead (anticipate) and take steps to address barriers that impede disabled people. Providers should not wait until a disabled person experiences difficulty using a service, as this may make it too late to make the necessary adjustment. It is no longer necessary to show that the provider's practice etc. makes it 'impossible or unreasonably difficult' to access the service - **the test is whether the practice places the disabled person at a “substantial disadvantage”**; legally this is a lower threshold for action.

In summary, service providers are required to:

1. Make ‘reasonable’ changes to the way things are done – such as changing practices, policies or procedures where disabled people would be at a ‘substantial disadvantage’ e.g. amend a ‘no dogs’ policy.
2. Make ‘reasonable’ changes to the built environment - such as making changes to the structure of a building to improve access e.g. fitting handrails alongside steps.
3. Provide auxiliary aids and services - such as providing information in an accessible format, an induction loop for customers with hearing aids.

Above and beyond the service provider duties, the Public Sector has an **additional Equality Duty** (section 149) which has three aims. It requires public bodies to have ‘due regard’ to the need to:

- eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act;

⁴² Southwark Council is a service provider under the Equality Act

- advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
- foster good relations between people who share a protected characteristic and people who do not share it.

Having ‘due regard’ means consciously thinking about the three aims of the Equality Duty as part of the process of decision-making. The Equality Duty also explicitly recognises that disabled people’s needs may be different from those of non-disabled people. Public bodies should therefore take account of disabled people’s impairments when making decisions about policies or services. **This might mean making reasonable adjustments or treating disabled people better than non-disabled people in order to meet their needs.** Compliance with the Act can only be legally determined through a Civil Action in a Court of Law.

Other relevant legislation

The Equality Act is not the only legislation that is applicable to the provision of an accessible environment and service and it should, therefore, be considered in conjunction with other legislative requirements, such as:

- Planning & Highways legislation
- Listed Buildings Consent
- Building Regulations
- Health and Safety Regulations
- Licensing Laws
- The UN Convention on the Rights of Persons with Disabilities**

Note: this is a guide and not a complete list.

**The Convention on the Rights of Persons with Disabilities (CRPD) is an international legal agreement. It exists to protect and promote the human rights of disabled people. The UK signed the treaty in 2009 – a commitment to promote and protect the human rights of disabled people. On accessibility ([Article 9](#)), the Convention requires countries to identify and eliminate obstacles and barriers and ensure that disabled people can access their environment, transportation, public facilities and services, and information and communications technologies. Courts have treated regard to the CRPD as being part and parcel of the duty to have ‘due regard’ to the equality enhancing aims of s149 Equality Act 2010.

CAE Scope of Report

This report is based on information and access provided to the consultant at the time of audit. Any recommendations are based upon evidence seen. While every care is taken to interpret current Acts, Regulations and Approved Codes of Practice, these can only be authoritatively interpreted by Courts of Law. Undertaking the recommendations in the report may assist with meeting obligations under the Equality Act 2010 but does not guarantee this, as further adjustments may be needed as and when an individual’s particular disability requires. The Act does not contain prescriptive standards to improve accessibility or inclusion. As such, compliance with the Act cannot ultimately be determined. Only tangible standards set out in guidance documents can be referred to for compliance.

Report Review

Issue Date	Version	Author	Notes	Sent for review to
35/10/21	1.0	CAE	For internal review	CAE
15/10/21	1.0	CAE	For initial review	1 st issue to Southwark
29/10/21	2.0	Southwark	Formatting /feedback	CAE
01/11/21	3.0	CAE	Formatting /feedback	CAE
06.01.22	4.0	CAE	Addendum update	CAE BP
06/01/22	5.0	CAE	Internal review and issue	to LB Southwark
10/01/22	6.0	CAE	Updated addendum	Final issue

Appendix 4 CAE Terms and Conditions

Terms and Conditions

1. The advice and recommendations provided in our audit reports or appraisals does not guarantee legal compliance. There may be other changes required, such as amendments to management practices, staff training in disability awareness and the provision of printed and electronic information in accessible formats
2. The reports and work issued by us are specifically intended for the client, and any reliance on the content by any third party shall be at their sole risk, unless otherwise expressly agreed by us in writing. Unless specifically agreed otherwise, there will be no rights of assignment.
3. CAE access consultancy and /or training advice and recommendations do not specifically make financial allowance for moving, alteration, diversion or adaptation of existing building services, and you may wish to commission feasibility studies or detailed investigation prior to implementing our recommendations where building services are adjacent to recommended works
4. All recommendations in audit reports should be reviewed prior to implementation of any works to ensure validity at the time as case law is likely to further clarify the interpretation of legislation over time and legislative changes may occur.
5. CAE retain the copyright in and ownership of all reports and other documents presented to the Client under the contract, unless specifically otherwise agreed. Clients may not make any alterations to the content of any reports or other documentation prepared by us without prior consent in writing. Any alteration that the Client wants to make to the original documentation must be reviewed by the Auditor/Consultant and all changes must be expressly agreed in writing
6. Habinteg does not accept any responsibility for any loss occasioned by reason of non-compliance with legislation, including the Equality Act 2010 and any subsequent amendments. All advice is given in good faith and based upon information and knowledge available at the time of the audit.
7. Supply of Services. Habinteg shall from the date set out in the Order and for the duration of the Contract supply the Services to the organisation in accordance with the terms set out in this proposal.
8. In providing the Services, the organisation will : co-operate with Habinteg in all matters relating to the Services, observe all health and safety rules and regulations and any other security requirements that apply on site visits at premises;
9. Charges and payment. Habinteg may at any time, without notice to the Supplier, set off any liability of the Supplier to Habinteg against any liability of Habinteg to the Supplier. Any exercise by Habinteg of its rights under this clause shall not limit or affect any other rights or remedies available to it under the Contract or otherwise.
10. Intellectual property rights. All Habinteg Materials are the exclusive property of Habinteg. All intellectual property rights arising out of or in connection with the Services shall be the property of Habinteg unless otherwise agreed in writing by the parties.
11. Indemnity. The Supplier shall indemnify Habinteg against all liabilities, costs, expenses, damages and losses (calculated on a full indemnity basis) suffered or incurred by Habinteg arising out of or in connection with: (a) any claim made against Habinteg for actual or alleged infringement of a third party's intellectual property rights arising out of, or in connection with, the manufacture, supply or use of the Goods, or receipt, use or supply of the Services (excluding Habinteg Materials); (b) any claim made against Habinteg by a third party for death, personal injury or damage to property arising out of, or in connection with, defects in the Goods, as delivered, or the Deliverables; (3) and any claim made against Habinteg by a third party arising out of or in connection with the supply of the Goods, as delivered, or the Services. This clause 9 shall survive termination of the Contract.
12. Insurance. Habinteg holds professional indemnity insurance of £10m. No liability shall attach to the Auditor/Consultant in respect of the duties executed except such liabilities as are covered by that insurance. The level of liability will be limited to the amount covered by professional indemnity insurance.
13. Confidentiality. Each party undertakes that it shall not at any time disclose to any person any confidential information concerning the business, affairs, customers, clients or suppliers of the other party, except as permitted by this clause. Each party may disclose the other party's confidential information: (a) to its employees, officers, representatives, subcontractors or advisers who need to know such information for the purposes of carrying out the party's obligations under the Contract. Each party shall ensure that its employees, officers, representatives, subcontractors or advisers to whom it discloses the other party's confidential information must comply with this clause 11; and (b) as may be required by law, a court of competent jurisdiction or any governmental or regulatory authority. Neither party shall use the other party's confidential information for any purpose other than to perform its obligations under the Contract.
14. Termination. Without affecting any other right or remedy available to it, Habinteg may terminate the Contract: (a) with immediate effect by giving written notice to the Supplier if: (i) there is a change of control (defined in section 1124 of the Corporation Tax Act 2010) of the Supplier; or (ii) the Supplier's financial position deteriorates to such an extent that in Habinteg's opinion the Supplier's capability to adequately fulfil its obligations under the Contract has been placed in jeopardy; or (b) for convenience by giving the Supplier [one] month written notice.
15. Without affecting any other right or remedy available to it, either party may terminate the Contract with immediate effect by giving written notice to the other party if: (a) the other party commits a material breach of any term of the Contract which breach is irremediable or (if such breach is remediable) fails to remedy that breach within a period of 14 days after being notified in writing to do so (b) the other party takes any step or action in connection with its entering administration, provisional liquidation or any composition or arrangement with its creditors (other than in relation to a solvent restructuring), being wound up (whether voluntarily or by order of the court, unless for the purpose of a solvent restructuring), having a receiver appointed to any of its assets or ceasing to carry on business or (c) the other party suspends, or threatens to suspend, or ceases or threatens to cease to carry on all or a substantial part of its business.
16. Force majeure. Neither party shall be in breach of the Contract nor liable for delay in performing, or failure to perform, any of its obligations under it if such delay or failure results from events, circumstances or causes beyond its reasonable control. If the period of delay or non-performance continues for [12] [weeks], the party not affected may terminate this agreement by giving [30] [days] written notice to the affected party.
17. Notices. Any notice or other communication given to a party under or in connection with the Contract shall be in writing and shall be delivered by hand or by pre-paid first-class post or other next working day delivery service at the address shown on the Order. A notice or other communication shall be deemed to have been received: on signature of a delivery receipt or, if sent by pre-paid first-class post or other next working day delivery service, at 9.00 am on the second business day after posting. This clause does not apply to the service of any proceedings or other documents in any legal action.
18. Severance. If any provision or part-provision of the Contract is or becomes invalid, illegal or unenforceable, it shall be deemed modified to the minimum extent necessary to make it valid, legal and enforceable. If such modification is not possible, the relevant provision or part-provision shall be deemed deleted.
19. Waiver: A waiver of any right or remedy is only effective if given in writing and shall not be deemed a waiver of any subsequent breach or default. A failure or delay by a party to exercise any right or remedy provided under the Contract or by law shall not constitute a waiver of that or any other right or remedy, nor shall it prevent or restrict any further exercise of that or any other right or remedy.
20. No partnership or agency. Nothing in the Contract is intended to, or shall be deemed to, establish any partnership or joint venture between the parties, constitute either party the agent of the other, or authorise either party to make or enter into any commitments for or on behalf of the other party.
21. Entire agreement. The Contract constitutes the entire agreement between the parties and supersedes and extinguishes all previous agreements, promises, assurances, warranties, representations and understandings between them, whether written or oral, relating to its subject matter. Third party rights. The Contract does not give rise to any rights under the Contracts (Rights of Third Parties) Act 1999 to enforce any term of the Contract.
22. Variation. Habinteg may vary these Conditions in order to comply with any legal, regulatory or statutory duty or obligation. Except as set out in these Conditions, no variation of the Contract, including the introduction of any additional terms and conditions, shall be effective unless it is agreed in writing and signed by the parties or their authorised representatives.
23. Governing law. The Contract, and any dispute or claim (including non-contractual disputes or claims) arising out of or in connection with it or its subject matter or formation shall be governed by and construed in accordance with the law of England and Wales. Each party irrevocably agrees that the courts of England and Wales shall have exclusive jurisdiction to settle any dispute or claim (including non-contractual disputes or claims) arising out of or in connection with the Contract or its subject matter or formation