

Final Equality Impact Assessment London Borough of Southwark, Bermondsey Street

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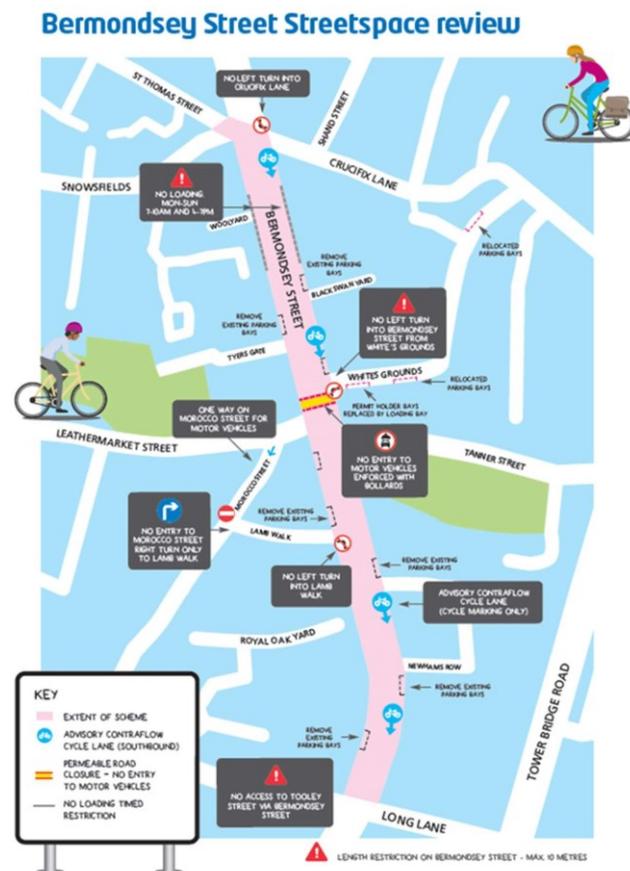


Table of Contents

1. THE BRIEF	3
2. EXECUTIVE SUMMARY: STREETSPACE CONSIDERATIONS FOR BERMONDSEY STREET AREA	8
3. CONSULTATION SUMMARY FEEDBACK FROM PROTECTED GROUPS UNDER EQUALITY ACT 2010..	8
4. SOUTHWARK STREETSCAPE MEASURES IN RESPONSE TO THE COVID-19 PANDEMIC	9
5. BERMONDSEY STREET STREETSCAPE MEASURES IN THE CONTEXT OF DIVERSITY AND EQUITY IN THE BOROUGH.....	9
6. SOUTHWARK PUBLIC CONSULTATION WITH PROTECTED GROUPS UNDER THE EQUALITY ACT ...	16
7. POTENTIAL IMPACTS ON PROTECTED GROUPS UNDER THE EQUALITY ACT 2010	17
8. CAE ACCESSIBILITY OVERVIEW OF BERMONDSEY STREET STREETSCAPE MEASURES	25
9. CONCLUSION AND RECOMMENDATIONS	34
10. APPENDICES.....	378
APPENDIX 1 - STREETSPACE MEASURES IMPACT AND EVIDENCE FROM SIMILAR SCHEMES	38
APPENDIX 2. REFERENCES	42
APPENDIX 3 LEGISLATIVE CONTEXT.....	43
APPENDIX 4 CAE TERMS AND CONDITIONS	478

2. The Brief

The Centre for Accessible Environments (CAE) has been appointed by Southwark Council to conduct an Equality Impact Assessment of the recently implemented Streetspace measures at Bermondsey Street. This report reviews the equality impact of the new Streetspace measures implemented in Bermondsey Street. This final EQIA report follows the initial desktop review published by Southwark Council in November 2021.

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 a 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. 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.

The initial EQIA report by CAE has been updated with the following;

- Public consultation feedback survey conducted by Southwark Council from 26 July to 17 September 2021..
- Three focussed consultation meetings with residents and visitors and one with businesses conducted online in August and September 2021. The responses were also split by streets.
- An in-person drop-in session held on 13 September at Bermondsey Village Hall.
- Any written feedback received from individuals or organisations representing protected groups on the Streetspace scheme sent to Southwark Council.
- CAE scheme site visits (October and November 2021) to the Bermondsey Street area
- Monitoring report traffic trends at 15 locations in the area by Southwark Council conducted during August 2021 and in the same locations in April and August 2021. Monitoring report of cycle traffic by Southwark Council conducted during June 2021.
- CAE have also referred to assessments of similar schemes in London boroughs that were implemented prior to the COVID 19 pandemic.

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.

3. Executive Summary: Streetspace considerations for Bermondsey Street area

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 data. Streetspace measures have the potential to increase levels of active travel by facilitating safe outdoor space (with respect to social distancing and also from traffic collisions) for socialising and travelling by foot. This will also assist some disabled and older people who may find it easier to cycle rather than walk.
- Although not broken down by protected groups, the modal share of cyclists increased to 15% of all traffic, mainly due to a 2% increase in cycling on weekdays. Bermondsey Street South of Crucifix Lane; Weston Street south of Guy Street and Snowsfields East of Weston Street saw the greatest share of cyclists. The general pattern indicates that car free areas encouraged most cyclists. Between White's Grounds and Crucifix Lane 61% of all traffic was cyclists. The motor vehicle busier Tanner Street saw a cycling decrease of 16% and Morocco Street 20%.
- 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.
- The ward has the highest percentage of children living in households claiming out of work benefits in the multi-ward area and children who are overweight and obese. Motor traffic restrictions could potentially assist both these groups by facilitating safer cycling and walking.
- Restriction of motor traffic needs to go hand in hand with improving the accessibility of the street environment. The public consultation and street survey indicated that the street environment in Bermondsey Street is not conducive for walking in many areas. There is a general lack of seating, narrow pavements, some with cobble stones and poor surfaces. Motor traffic idling in the northern areas, near the primary school, increases pollution and makes walking and cycling more difficult. Disabled people often feel excluded from exercise and active travel.
- Many mobility impaired people and people with neurodiverse conditions 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. The consultation feedback reported more seating should be provided for people to rest if they struggle to walk far.

Impact on travel by car

- The overall volume of motor traffic recorded across all streets in the Streetspace Bermondsey Street scheme decreased by 3% during weekdays when comparing August 2020 and August 2021. On the weekends traffic increased by 1%. There was an initial increase in both weekday and weekend traffic through the area until a fall from April 2021.
- The section north of the filter on Bermondsey Street saw a large decrease of 62% on weekdays and 68% on weekends between the three waves of measurement. There was also a decrease of 30% to the south of the filter, although predictably Tanner Street increased considerably by 132% (144% on weekends), as vehicles were redirected from Bermondsey Street to the right to avoid the filter.
- To The North, Crucifix lane and Barnham Street saw a large 85% increase in traffic on weekdays and 122% on weekends.
- White's Grounds saw a large 61% decrease in traffic on weekdays and 51% on weekends.
- The volume of motor traffic counted on external streets had remained fairly static with a increase of 1% on Kipling Street and a 15% increase on Weston Street, as vehicles found alternative routes to Bermondsey Street. Traffic on the West of Long Lane decreased by 3%. Snowfields, around the school, decreased 12%.
- The modal share of cars and light vans increased slightly by 2%.
- The general pattern appears to be a diversion of traffic to the North then West of the area, with the North bearing the brunt of the traffic volumes. This is likely to explain why the people living in the Snowfields Road area had a higher rate of objection to the scheme.
- Vehicle speeds decreased generally by 0.9mph across the area on weekdays and 0.4mph at weekends, with the average speed at 14.5mph in August 2021. White's Grounds saw the largest decreases of 4.2mph on weekdays and 2.4mph at weekends.
- The scheme is likely to have a positive impact on disabled and older people, parents and carers with small children who walk and cycle due to the decreased congestion on central and most main roads where car travel has decreased because of the changes.
- The consultation confirmed some adverse effects on those dependent on cars including some business owners, older and disabled people. For many disabled people a car is a necessity with private space to carry out certain personal functions essential for them.
- It is noted that the majority of existing Blue Badge parking bays are located in the areas most affected by the modal filters, such as along Bermondsey Street, Tanner Street and White's Grounds. The impact of the traffic restrictions is likely to disproportionately impact on Blue Badge holders, both via the loss of a parking space and considerably

increased through traffic. Further investigation is required to assess impact and mitigate individual restrictions for all Blue Badge holders in the area.

- The extension of Blue Badge parking spaces and companion badge holders within the scheme will mitigate the negative impact of these measures on disabled people and their carers.

Travel to schools

- The Streetspace measures aimed to promote healthy, non-polluting active travel. Post implementation monitoring and surveys indicate less road traffic on the primary school in the area but increased congestion and traffic on strategic roads to the North of the school, such as Crucifix Lane.
- Some disabled school children being dropped off by car could be potentially negatively impacted by increased car journey times due to the Bermondsey street modal filters, main road congestion or delayed bus journeys.
- The impact on air quality in the area around the school should be the subject of further investigation.

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 responses indicated that bus and train travel have not changed significantly as a result of the scheme. Further information on bus journey times and changes was not made available as part of the consultation results.

Impact on external streets

- With schemes of this type restricting motor traffic along residential streets while allowing traffic along main and boundary roads, there is potential there will be increased congestion on main roads due to traffic displacement. Traffic monitoring indicates a rise in motor traffic to the North of the Bermondsey Street area and a general fall in other areas.
- The main roads surrounding the area overall saw a decrease of junction turning counts of between 11 and 16%, indicating an overall fall in traffic around this scheme, going against the general Southwark trend. This compares with an overall slight increase across Southwark on strategic roads over the last year, although in June 2021 traffic in Southwark was 8% lower than pre-pandemic levels (based on TfL permanent count sites).
- To the North, Crucifix lane and Barnham Street saw a large 85% increase in traffic on weekdays and 122% on weekends.
- It is worth noting that evidence compiled from previously implemented similar motor traffic reduction schemes in London and elsewhere, in an article¹ 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 due to people making a wide range of behavioural responses to the new

traffic configurations.

- It is clear that people travelling through the area have diverted on some routes to the West of Bermondsey Street, although the impact has not been considerable. The greatest impact of increase vehicle flow has been to the North of the area. This is of concern as it is near the only school in the area and the residents in this area are most opposed to the scheme, suggesting the burden of displaced traffic rests in this area.
 - Further investigation of the impact on this area is recommended, with appropriate mitigating action.
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- ¹ 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/>

Access to green space

- Lowering levels of motor traffic on streets has the potential to make it easier to get to parks and open spaces, by making street crossings safer and making it safer to walk and cycle along streets.

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.

Public Consultation

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.

Negative impact:

- The popularity of the streetscape measures broadly declines with the age of the respondent.
- Older people and people with disabilities with cars were strongly in favour of returning the streets to the original scheme, although the opposite was reported for those without cars.
- People who owned a car were more likely to ask for the area to be returned to its original state and stated that it is harder to use a car.
- A number of people stated that the filter had increased pollution / traffic and speeding.
- Although travel in the area became more pleasant, people reported more traffic, pollution and feeling unsafe walking due to cyclists and scooters on the pavement.

- There was a low response rate (4%) from the businesses in the area, who felt it had reduced flexibility with deliveries, reduced traffic but not improved business. Businesses were split on whether to keep the measures. Conversely, residents reported using local businesses more and walking or cycling to them more.
- The burden of traffic volume has generally shifted to the strategic roads on the perimeter, particularly the North of the area, near Snowfields primary school.
- The few Blue Badge parking spaces in the area have been negatively impacted by the location of the closures and the increase in traffic through some streets.

Positive impact

- Most respondents agreed strongly with the scheme aims and success, making Bermondsey Street a more pleasant place to shop, walk and cycle and reduce traffic.
- The response by street location was generally in favour of retaining but modifying the streetscape measures, with two streets to the north of the road barrier preferring a return to the original arrangements. One of these streets serves the only school in the area.
- Support for the measures roughly increased in line with levels of education, household income, although a higher percentage of self-employed people were against the measures.
- As most respondents did not own a car, there was little reported increase in walking and cycling, although it was reported to have become easier.
- Very high numbers of respondents would like to support local businesses by providing more seating and expanding the road closure to the full length.
- More visitors would like to retain or modify the scheme than return to the original arrangement, perhaps via the measures detailed in the bullet point above.

4. Consultation summary feedback from Protected Groups under Equality Act 2010

Consultation recommendations from protected Groups:

- Ensure safe, active travel corridors for all, including older and disabled people.
- The best ways reported to encourage less car use are to;
 - improve pavements and crossings
 - prioritise streets for walking with planters and benches
 - more parklets
 - increased traffic calming measures to reduce increased speeding
 - allow access to taxis. Allowing access for taxis featured strongly in the measures to support older and disabled people.
- Barriers to walking should be addressed: Surfaces and quality of streets and footways need to be improved to allow easier walking and cycling; more seating and rest places should be provided, particularly for those with limited ability to walk long distances. For older people, wider pavements and improved kerbs and crossings were most important.
- For many disabled and older people, a car does not just assist with mobility issues. It is a necessity with private space to carry out certain personal functions and therefore

essential for them. Blue Badge holder and private accessible and hire car exemptions were not detailed by disabled people during the survey, although 110 respondents thought more disabled parking bays would help support older people and disabled people. There are currently eight live Blue Badge parking spaces in the area. The Bermondsey Street modal filters have directly affected many existing Blue Badge parking bays and consultation with badge holders is highly recommended as soon as possible.

- Promote cycling with safe, dedicated and linked up cycle routes and more segregation, provide cycle training, safety awareness, penalties for cyclists and better access to bikes via 'Try before you Buy' and provide more secure bike hangars on streets.
- Most disabled and older people were not sure how the changes affected them apart from it taking longer to get around by car and receive visitors.
- There were no clear patterns on whether different ethnicities wanted to retain or remove the measures.
- The preference to retain or remove the measures was equally split by gender, although far fewer women responded to the questionnaire.
- There was no clear pattern of preference measured by religion or belief on a percentage basis.
- The streetspace measures have increased the traffic count to the North of the area, near the only school in the area. Residents in this area are more opposed to the scheme and children may be exposed to higher air pollution levels than previously. This should be investigated as soon as possible, and mitigation measures introduced.

5. Southwark Streetspace measures in response to the Covid-19 pandemic

The use of modal filters to create motor traffic restricted areas has been used across the UK for many decades. In May 2020 fast track implementation of such schemes was a response to the Covid pandemic, required by the UK government who announced £250m in emergency active travel funding and asked local authorities 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 DfT'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 bollards, 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. However, some car journeys are likely to be longer and more

complex due to the detours introduced. Motor vehicles can still access all addresses within the area, including for deliveries and parking.

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 which is 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 a number of smaller trial schemes in North Peckham Brunswick Park, East Faraday, Great Suffolk Street and Bermondsey Street. The project in the first three areas is partnered with Guy's & St Thomas' Charitable Trust who are committed to reducing health inequalities in Lambeth & Southwark. They particularly focus on child obesity, long-term conditions and air quality that together make a focus on Healthy Streets an obvious priority for them.

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 residents compared to other London boroughs.

Aims of Southwark Streetscape measures 2020

This report reviews the equality impact of the new Streetspace measures implemented in Bermondsey Street in December 2020.

The streetspace scheme in the Bermondsey Street area has the following aims:

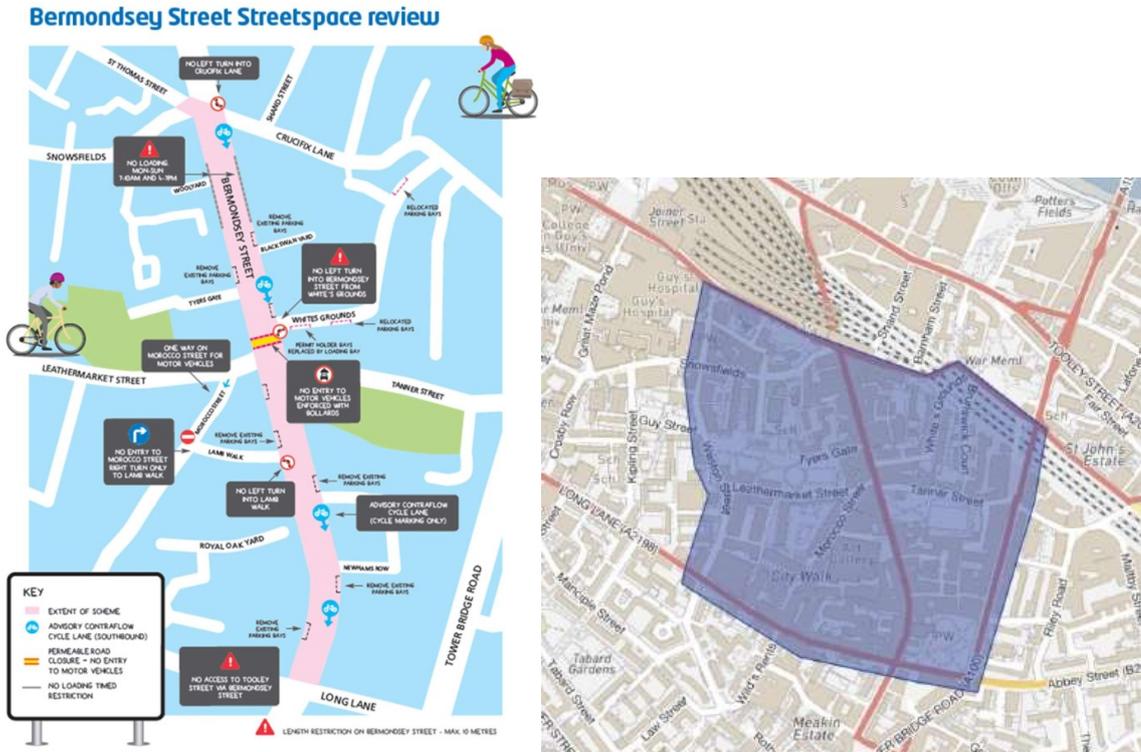
- Improve road safety.
- Help tackle the climate emergency.
- Make walking and cycling enjoyable, safe and easy ways of getting around.
- Reduce inequalities in health and wellbeing.
- Reduce the amount of cut-through traffic.
- Reduce parking pressure for local residents.
- Encourage people to shop local to help businesses and reduce car use.
- Create a greener and healthier environment by improving air quality and reducing pollution and noise levels.
- Make more space on our pavements for social distancing to help keep everyone safe from COVID-19.

The measures include a number of one-way street alterations with modal filters, closing off the main short cut through the area to vehicles. The temporary arrangements include bollards to stop vehicular traffic passing through the ends of a main through road. Access is available to both sides but not through the filter, for all vehicular traffic. Cyclists and pedestrians can pass through. Cycleways and cycle superhighway routes have been prioritized, including modal filters at road junctions along the routes and one-way systems to reduce vehicular traffic.

It is noted that there is one school in the area that would benefit from the surrounding streets having less motor traffic to allow school children to walk or cycle to school, or to provide easier

movement for school coaches or mini-buses. Traffic management measures are identified in the figures below for Bermondsey Street.

Bermondsey Street Streetspace measures



Due to the perceived urgency of the situation, all these measures were permitted by the government via new legislation and statutory guidance to be 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. Since implementation, Southwark Council has been using online platforms for engagement with residents, a screenshot is shown below.

Bermondsey Street Streetspace review

In 2020, we implemented a traffic filter on Bermondsey Street between White's Grounds and Morocco Street with no entry to motor vehicles.

The aims of this filter and the complementary measures were to:

- Make more space on our pavements for social distancing to help keep everyone safe from Covid-19
- Reduce the amount of cut-through traffic
- Improve the experience for those walking and cycling
- Encourage people to shop local to help businesses and reduce car use

This consultation starts on 26 July 2021 and runs until 17 September 2021

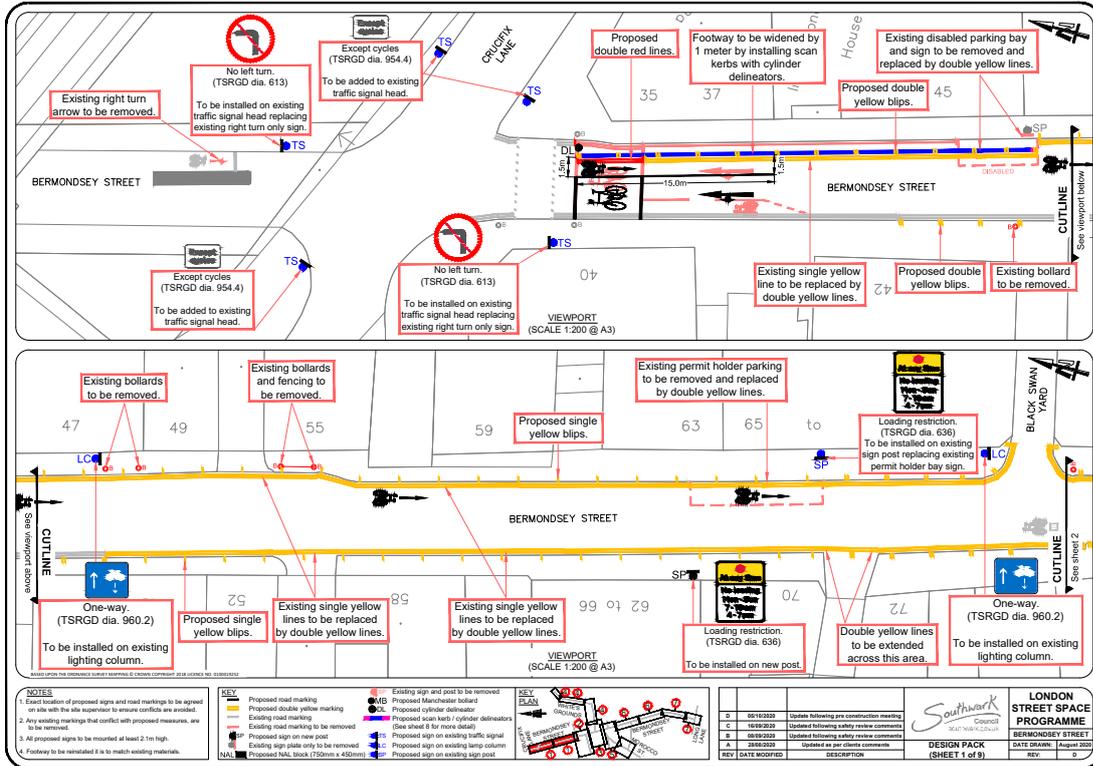
KEY

- EXTENT OF SCHEME
- ADVISORY CONTRAFLOW CYCLE LANE (SOUTHBOUND)
- PERMEABLE ROAD CLOSURE - NO ENTRY TO MOTOR VEHICLES
- NO LOADING/TIMED RESTRICTION

Measures implemented in the Streetspace schemes for Bermondsey Street were implemented in 2020 under an experimental traffic management order include:

The installation of a modal filter on Bermondsey Street

A series of detailed plans for the alterations provided further detail on the scheme, for example:



Modal Filter, Bermondsey Street /Whites Grounds.



Junction Bermondsey Street / Tanner Street

The experimental traffic management order will conclude on 25 April 2022.

Schools in the Bermondsey Street area

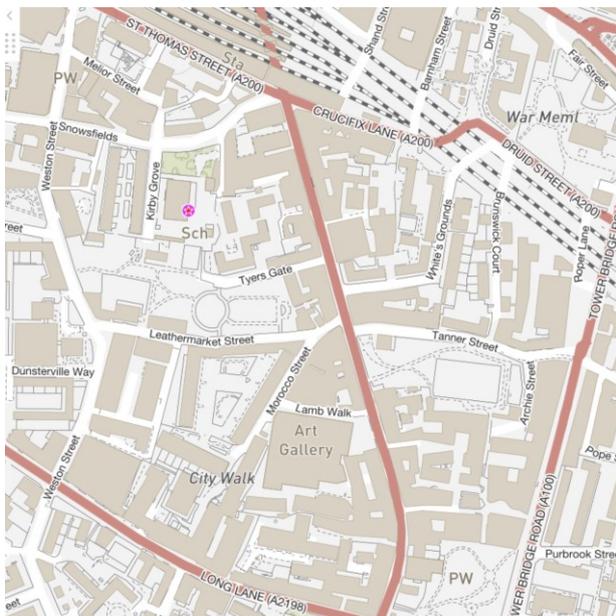
It is noted that there is one school located in the area. While many school children are local, a good proportion travel across Southwark through the neighbourhood to get to their school and mini-buses and coaches are used by school children.

Traffic filters restrict other motor vehicle access, limit short cuts through the area and the volume of traffic and are of benefit to school children on their way to school.

In addition, restriction of motor traffic would encourage parents to allow more children in the neighbourhood to walk and cycle to school and to permit more independent travel.

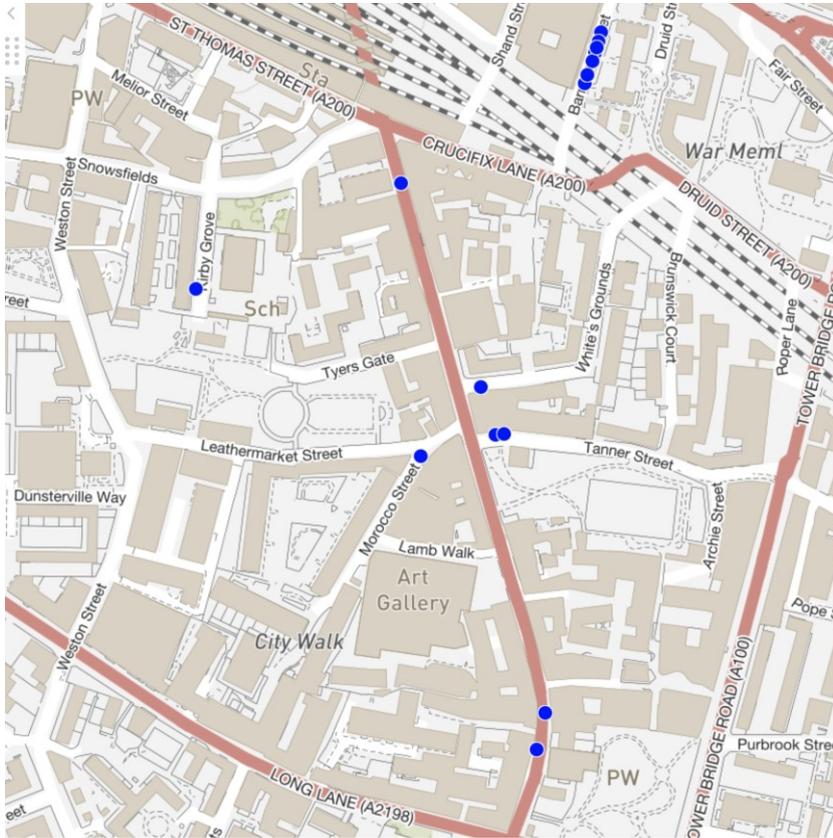
The schools in the area include:

- Snowfields Primary School



Blue Badge parking within the Streetspace trial area

The map below details the live Blue Badge parking bays, indicated by blue dots.

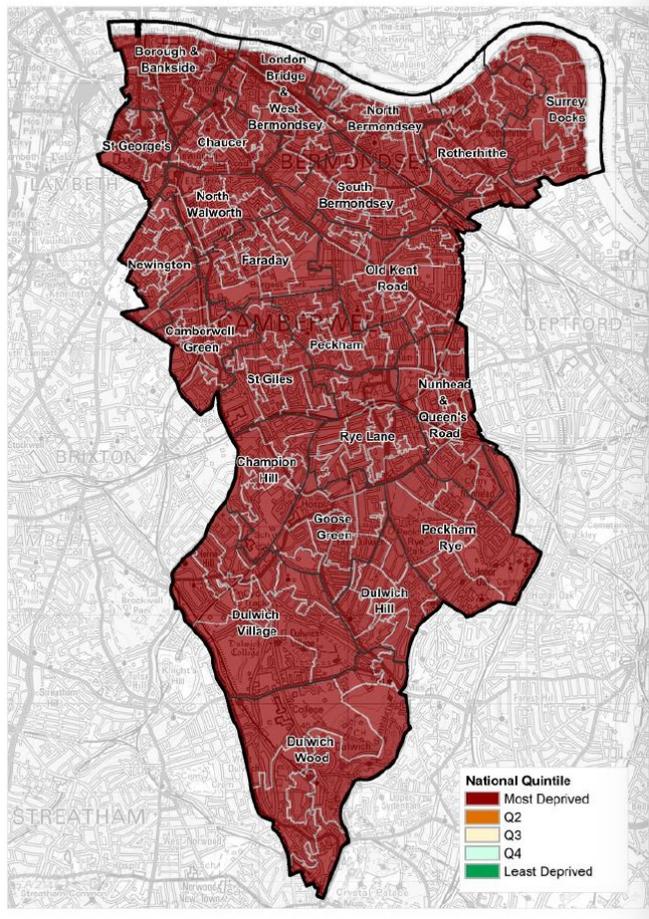


The area contains very few Blue Badge parking bays relative to other similar areas in the Borough. A number of them are located on the main route containing the modal filter and the junctions where diversions have been installed.

6. Bermondsey Street Streetspace measures in the context of diversity and equity in the borough.

It is noted that Southwark is one of the most deprived boroughs in England with a rank of 40 out of 326 local authorities. 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 England.

Figure 19: Outdoor environment sub-domain



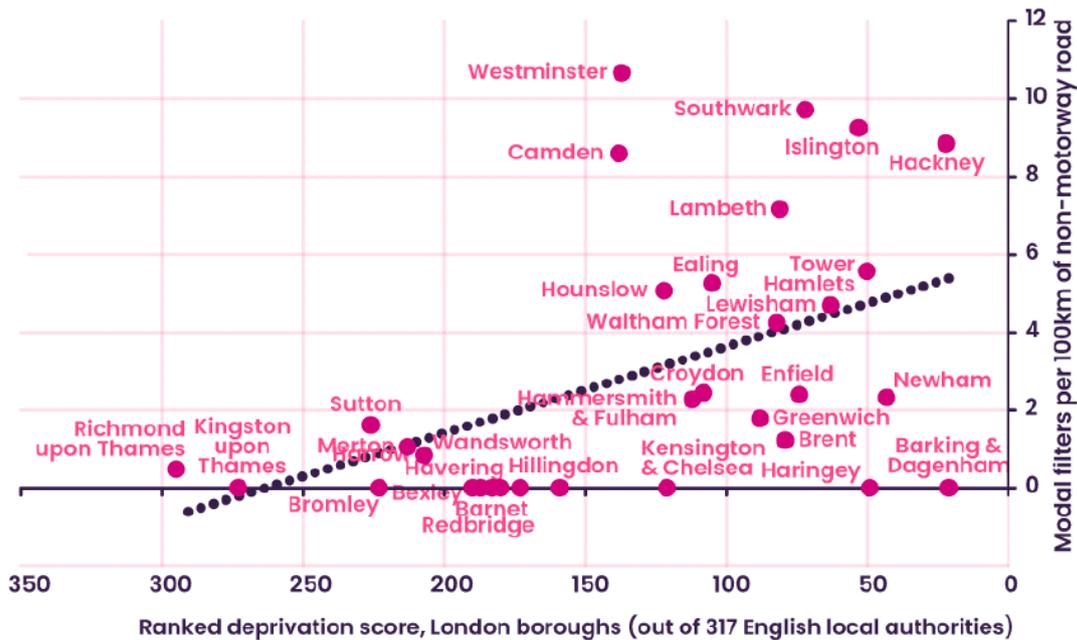
Improving the street environment with its high motor traffic volumes is therefore critical to redressing the poor quality of the outdoor living environment.

Southwark's Joint Strategic Needs Assessment Multi-Ward Profiles 2019 South Bermondsey Ward indicates the demographic characteristics of the area include:

- A ward with a diversity higher than the national average, and lower than Southwark overall. 39.8% of residents in the Bermondsey area are non-white compared with 45.8% in Southwark.
- South Bermondsey has the highest percentage of children living in households claiming out of work benefits in the multi-ward area, at 24.2% compared to 18.5% in Southwark generally.
- Average proportion of older people with 8.1% people older than 65 years compared to Southwark average of 8.2%
- Approximately 27.3% of children living in South Bermondsey are overweight or obese in Reception, rising to 43.6% by Year 6, which is slightly higher than the Southwark average
- The overall crime rate in Bermondsey is 84.7 per 1,000 residents, compared with 115.4 in Southwark generally

The data indicates a Southwark average proportion of older people and a high proportion of children who are overweight or obese and the highest proportion of children living in households claiming out of work benefits. These are all vulnerable groups in Southwark.

This table below highlights Southwark’s ranked deprivation score in relation to provision of Streetspace measures from the recent study *LTNs for all*¹?



Southwark-should continue to consider equity when developing and prioritising modal filtered areas, given that Streetspace schemes may particularly benefit people living without access to private greenspace or local safe public spaces for playing and socialising.

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

Due to the perceived urgency of the situation, the Streetspace measures were permitted by the Government via new legislation and statutory guidance. These orders allow measures to be put in place on a trial basis with consultation happening **concurrently** during the implementation period. Southwark Council has been using online platforms for engagement with residents. People consulted include those living on boundary streets and neighbouring areas. The consultation and results of traffic monitoring and pollution monitoring will be published by Southwark Council.

A flyer was sent to 2,614 residential addresses and 689 letters sent to commercial properties in the area. Lamp column sleeves were also installed along Bermondsey Street. Further engagement and consultation with residents and businesses, including zoom drop in events are continuing, including a drop-in session on 13th September 2021 at Bermondsey Village Hall.

¹ *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.

The consultation went live on 28 July 2021.

Ward councillors were notified and asked to send details of the online consultation. Details of the consultation were sent to the following key stakeholders:

- Team London Bridge
- Bermondsey, London
- London Cycle Campaign - Waste Management
- Police
- Fire Brigade
- Ambulance
- Guide dogs
- RNIB
- Transport for All
- London Travel Watch

This section provides an analysis of Protected Characteristic Groups under the Equality Act (EA), 2010 relevant for this EQIA assessment. These are Age, Disability, Gender, Pregnancy/Maternity and Race. In addition, levels of deprivation and income levels are also considered.

There is no detail provided in Southwark's JSNA data sheets on travel methods for Southwark's residents, so 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.

Profile of respondents in public consultation of protected groups (Equality Act)

Disability

Disability and Health	Count	Percentage
No	312	84%
Not Answered	3	1%
Prefer not to say	31	8%
Yes	26	7%
Grand Total	372	

Age

Age	Count	Percentage
18 - 24	8	2%
25 - 34	114	32%
35 - 44	88	24%
45 - 54	75	21%
55 - 64	55	15%
65 - 74	16	4%
75 - 84	3	1%
85 - 94	1	0%
(blank)		
Grand Total	360	

Sex

What is your sex as recorded a	Count	Percentage
Female	97	26%
Male	191	51%
Not Answered	63	17%
Other (please specify if you wish)	2	1%
Prefer not to say	19	5%
Grand Total	372	

Sexual orientation

What is your sexual orientation?	Count	Percentage
Bi-sexual	7	2%
Gay man	42	15%
Heterosexual/straight	189	67%
Lesbian/Gay woman	4	1%
Other (please specify if you wish)	6	2%
Prefer not to say	35	12%
(blank)		
Grand Total	283	

Religion or belief

What is your religion or belief?	Count	Percentage
Buddhist	3	1%
Christian	74	27%
Hindu	2	1%
Jewish	4	1%
Muslim	11	4%
No religion	164	60%
Other	17	6%
(blank)		
Grand Total	275	

Ethnicity

Ethnicity	Count	Percentage
White British	283	54%
Other European	66	13%
Other White (please specify if you wish)	42	8%
White English	37	7%
White Irish	22	4%
Other ethnic background (please specify if you wish)	14	3%
Asian British	8	2%
Black British	7	1%
White Scottish	7	1%
Indian	6	1%
Chinese	5	1%
Latin American	5	1%
Mixed White/Asian	5	1%
Other Mixed background (please specify if you wish)	5	1%
Any other Asian (please specify if you wish)	4	1%
Pakistani	4	1%
Gypsy, Roma or Irish Traveller	2	0%
Mixed white/Black Caribbean	2	0%
Bengali	1	0%
Black Caribbean	1	0%
Other African	1	0%
Other Black (please specify if you wish)	1	0%
Grand Total	528	

Household Income

What is your household income?	Count	Percentage
£20,000 to £30,000	24	6%
£30,001 to £40,000	24	6%
£40,001 to £50,000	17	5%
£50,001 to £60,000	20	5%
£60,001 to £70,000	10	3%
Not Answered	71	19%
over £70,000	120	32%
Prefer not to say	73	20%
under £20,000	13	3%
Grand Total	372	

Online public consultation and questionnaire responses

Residents were asked a standard set of questions relating to protected characteristics. Specific questions were asked relating to the experiences of older people and disabled people. Older and disabled respondents were more likely disagree with the aims of the scheme rather than to agree compared to non-disabled respondents who were more likely to agree with the aims.

Disabled respondents with one or more cars:

- 72-67% wanted the scheme returned to the original state
- 10-33% wanted to retain the scheme as it is or install a different kind of measure

Disabled respondents with no car:

- 18% wanted the scheme returned to the original state
- 83% wanted to retain the scheme as it is or install a different kind of measure

Overall returns showed respondents with one or more cars:

- 46-74% wanted the scheme returned to the original state
- 22-17% wanted to retain the scheme as it is or install a different kind of measure

Overall respondents with no car:

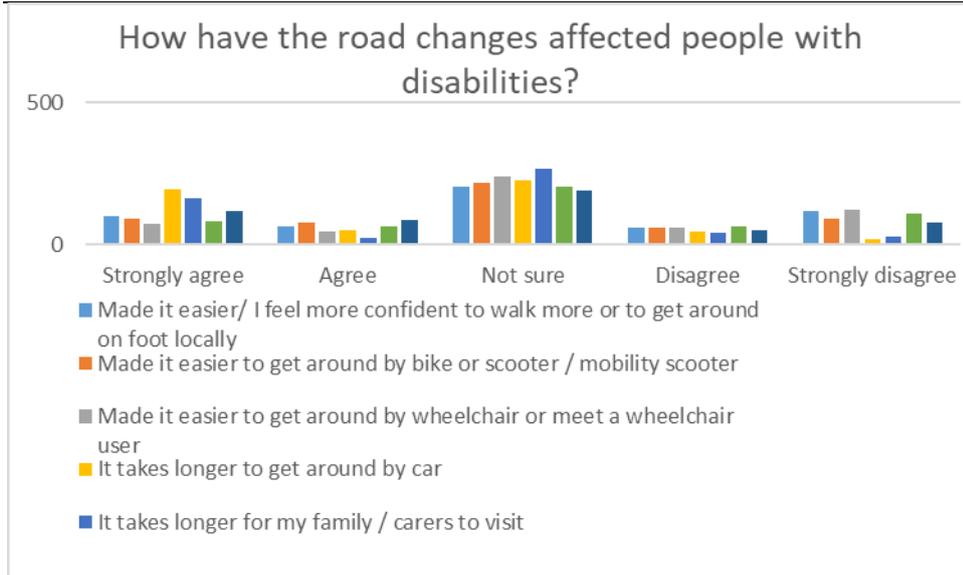
- 8% wanted the scheme returned to the original state
- 38% wanted to retain the scheme as it is or install a different kind of measure

This shows a substantial difference between preference for the scheme between disabled and non-disabled people, most notably for disabled people with one car, who overwhelmingly wanted the scheme returned to the original state.

This should be considered in line with the number and location of Blue Badge parking bays, the majority of which are located in the newly vehicle restricted and increased traffic areas.

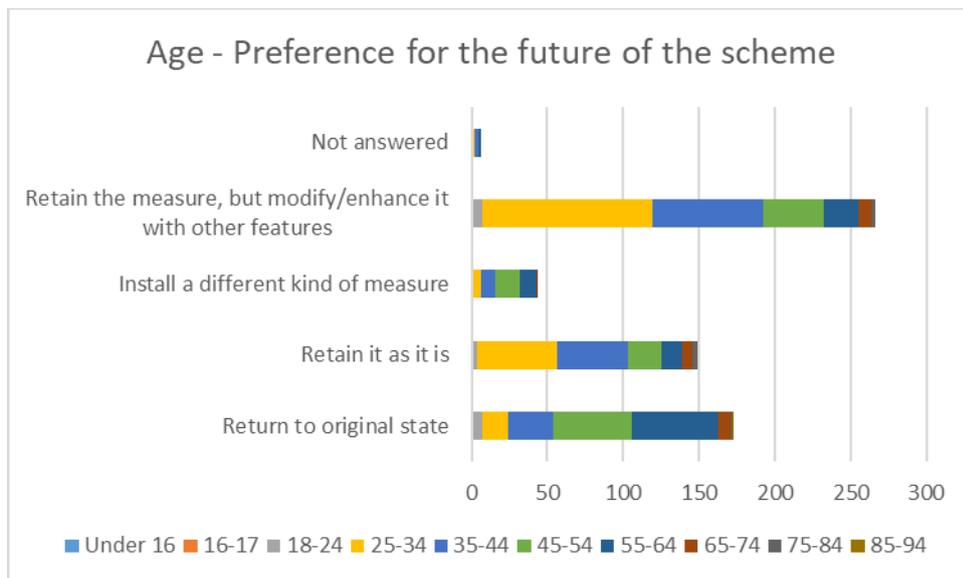
The response reveals an urgent requirement to mitigate the impact on disabled people, in particular Blue Badge holders in the area.

Most people were not sure about how the road changes affected disabled people

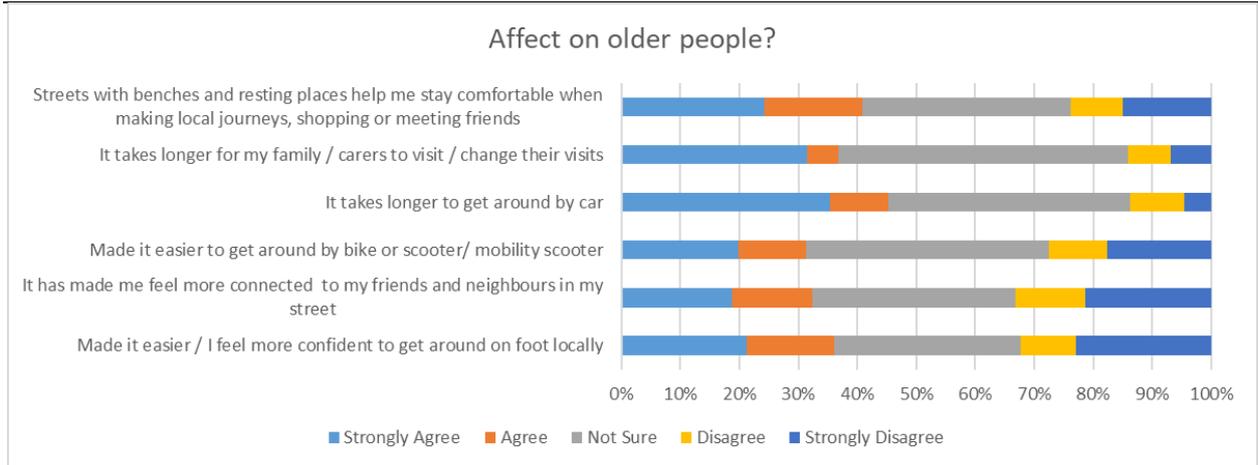


Age

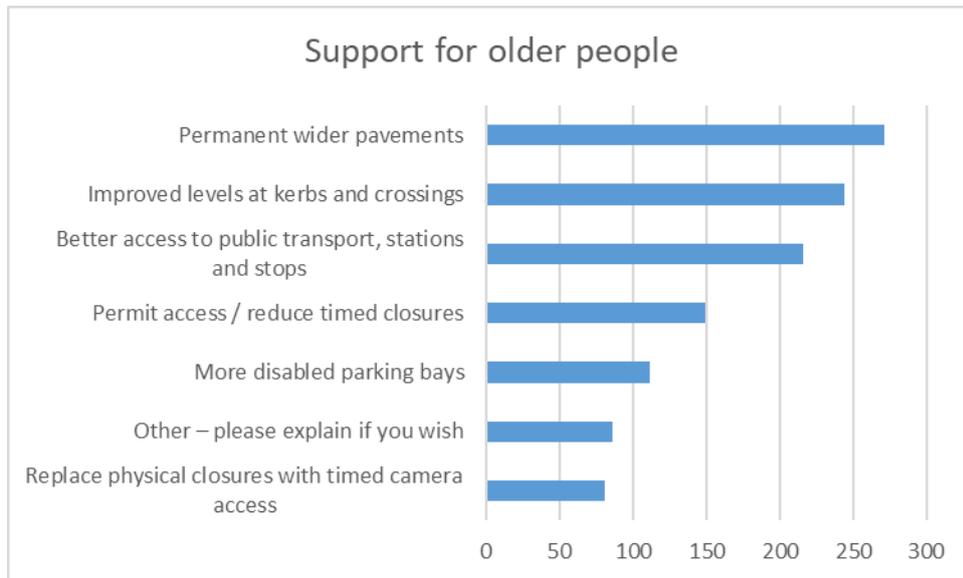
Younger people were generally in favour of the streetscape changes, with an increasing proportion preferring the former arrangements as the age profile increased.



Older people generally agreed that they found it easier to get around on foot, by bike/scooter/mobility scooter and that it takes longer to get around by car and for visitors such as carers and family.



In terms of using highways measures to support older and disabled people, most stated that wider pavements, improved kerbs and crossings and better access to public transport, stations and stops would be beneficial

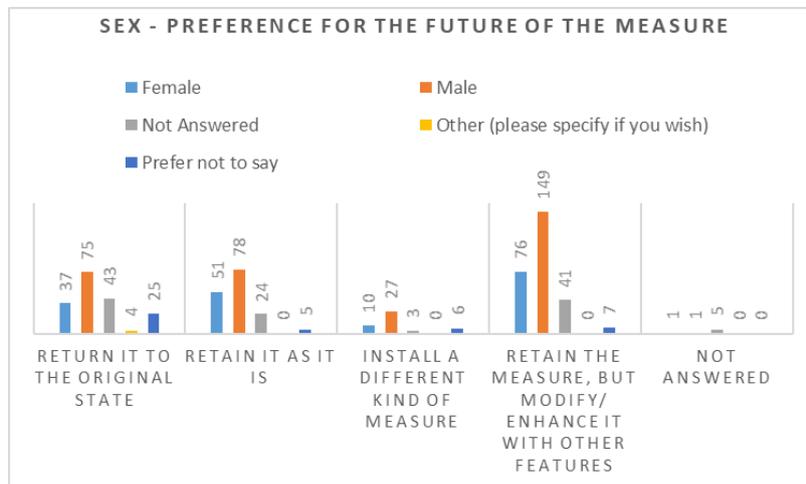


Respondents were also invited to provide individual responses on improvements, including:

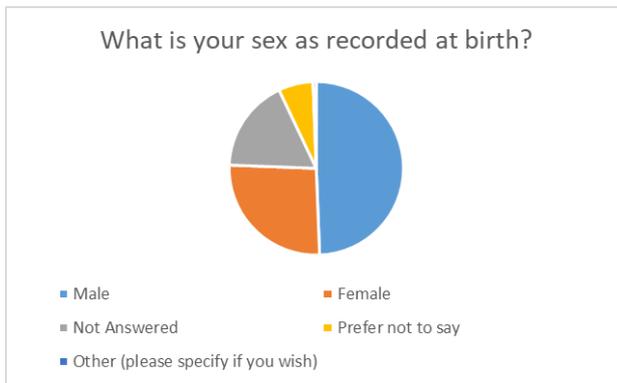
What can we do using highways measures to support older people and people with disabilities?	Count
Allow access for taxis	44
Widen/improve pavement	15
Remove road closure	15
Keep pavement clear	13
Allow access for private hire drivers	9
Remove all restrictions	9
Access issues for the elderly and disabled	8
Cyclists speeding - increase awareness on safety to pedestrians	8
Measures to reduce traffic	8
Allow access for all blue badge holders	5
Make closures permanent	5
General comment	5
More low traffic neighbourhoods	4
Penalise cyclists if they don't follow the regulations e.g. cycle on the pavement	4
Allow EV access	3
Measures to reduce traffic speed	3
Measures to road safety	3
Restrictions on E-scooters	3
Allow access for delivery vans	2
Electric bikes/trikes for older/disabled people	2
Increase parking bays	2
Longer journeys increase pollution	2
Measures to reduce street parking	2
More benches	2
More cycle hangers / storage	2
More/better street crossings	2
Pedestrian only road with access to residents only	2
Provide easy access for mobility scooters to cross the street e.g. Tanner Street	2
Remove all businesses signs from pavement	2
Segregated bike lanes	2
Stop closing all the roads	2
Timed road closure	2
Allow door-to-door transport service	1
Better access for cars	1
Bollards is confusing	1
Contra-flow cycle lane should be painted	1
Delivery with restricted time	1
Full closure on the street	1
Give access for cars and public transport	1
Less priority should be given to cyclists	1
Measures to reduce car ownership	1
More police/security	1
Remove camera enforcement	1
Remove cycle lane	1
Reopen London Bridge to relieve the traffic congestion	1
Restrict HGVs using bermondsey Street	1
Provide clearer signages	1

Sex

The difference between the male and female respondents showed no major differences. The chart below shows response by count.

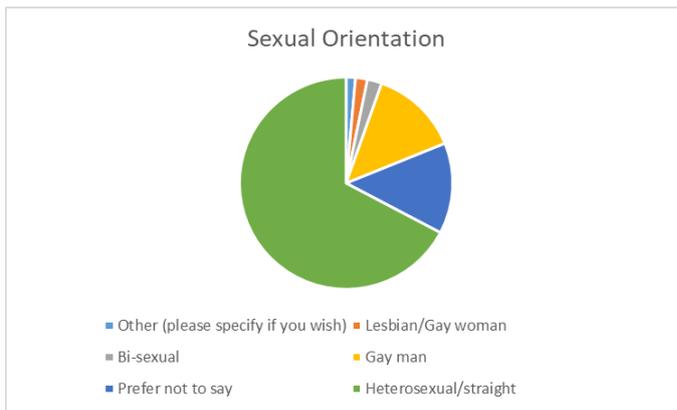


It was noted that the number of female respondents was approximately half compared with male returns.



Sexual orientation

There was no major difference between the responses for scheme preferences.



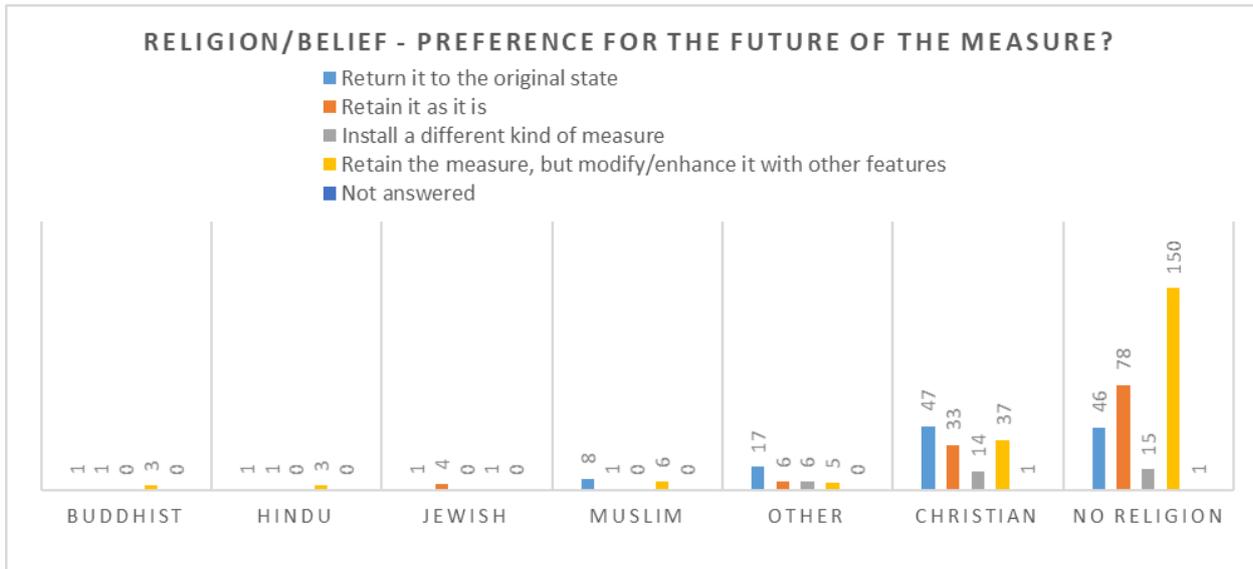
Ethnicity

There were no clear patterns on preferences for the streetspace scheme based on ethnicity.

Ethnicity	Return it to the original state	Retain it as it is	Install a different kind of measure	Retain the measure, but modify/ enhance it with other features	Not Answered	Total
White British	67	85	23	107	1	283
Other European	4	19	6	37		66
Other White (please specify if you wish)	5	9	1	26	1	42
White English	15	3	5	14		37
White Irish	9	3	1	9		22
Other ethnic background (please specify if you wish)	9	1	1	3		14
Asian British	4	2	0	2		8
Black British	4	0	3	0		7
White Scottish	2	1	0	4		7
Indian	0	1	0	5		6
Chinese	2	1	0	2		5
Latin American	2	1	0	2		5
Mixed White/Asian	1	1	0	3		5
Other Mixed background (please specify if you wish)	2	0	0	3		5
Any other Asian (please specify if you wish)	1	0	0	3		4
Pakistani	0	1	0	3		4
Gypsy, Roma or Irish Traveller	1	1	0	0		2
Mixed white/Black Caribbean	2	0	0	0		2
Bengali	0	1	0	0		1
Black Caribbean	0	0	0	1		1
Other African	1	0	0	0		1
Other Black (please specify if you wish)	0	1	0	0		1
Total	131	131	40	224	2	528

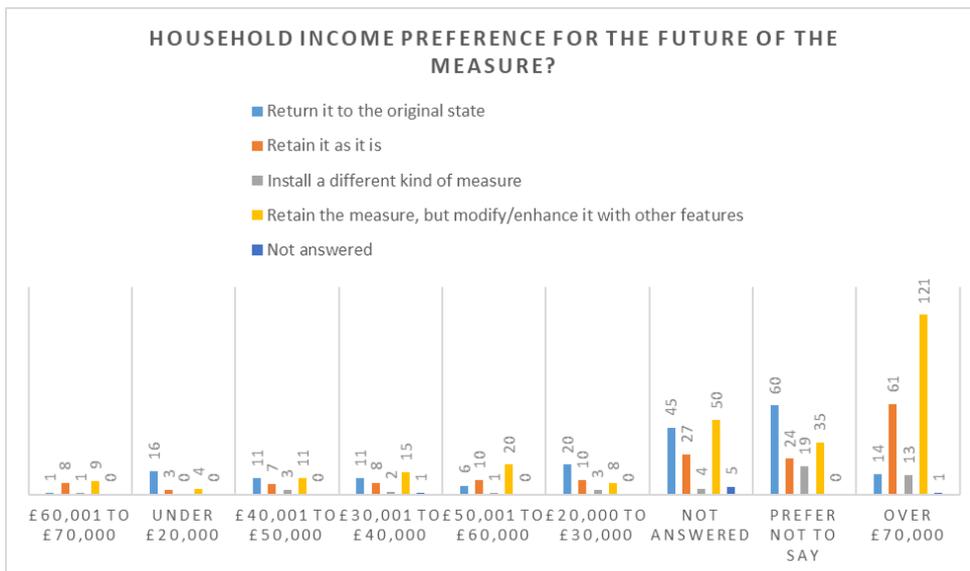
Religion or belief

There was no discernible pattern between preferences for the scheme in this group.



Household income

Preference to retain the streetscape scheme measures tended to increase as household income increased. A similar pattern was revealed with level of education.



8. Potential impacts on Protected Groups under the Equality Act 2010

The section outlines potential impacts on Protected Characteristic Groups that were not highlighted within the consultations but 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.

Protected Characteristic: Age

TfL data indicates:

- Walking is the most frequently used type of transport by older Londoners aged 65 and over (87 per cent walk at least once a week).
- Sixty-five per cent travel by bus,
- 43 per cent drive a car at least once a week which is higher than Londoners overall (38 per cent), though driving levels drop as people get older.
- 41 per cent travel by car as a passenger at least once a week.
- Londoners aged 65 and over continue to be less likely to cycle as a means of transport compared to all Londoners. Four per cent sometimes use a bicycle to get around London compared with 17 per cent of the wider London population.

Potential impacts of Streetspace measures on age groups

- Motor traffic restrictions, including traffic filters, are likely to make certain private vehicle journeys more indirect and longer. This may disproportionately affect those in the older 65+ age category who rely on cars more than other age groups. Driving levels drop as people get older.
- On the other hand, improving the walking and cycling environment by reducing vehicle movements will create a safer environment, benefits particularly older people who are more likely to be pedestrians. Safer streets may encourage more older people to cycle. However, this may not be a possible option for some people in older age categories with limited mobility.
- One way systems for vehicles prioritise cyclists. These impacts may benefit those aged 65+ who cycle, although they may be more reliant on buses and are more likely to have mobility impairments relating to age. Encouraging more traffic to use the surrounding streets rather than cut through this neighbourhood may make bus journeys slower and more prone to air pollution.
- The measures also benefit the many school children who use mini-buses and coaches to get to the schools in the area. The use of one-way routes and modal filters at junctions facilitates easy movement of buses and coaches used for school travel. The restriction of traffic and parking on bus-routes around schools will smooth the flow of buses and coaches and remove obstructions.
- Disabled children who are driven to school may be impacted by longer car journeys.
- Safer streets could encourage children to play outdoors and walk and cycle to school, reducing childhood obesity. There is one school in this area, and school children pass through the area to get to their school. Traffic restrictions will assist them to use active travel methods.
- People of young and old age 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 problems, therefore a reduction in emissions from private vehicle use and increases in active modes of travel will benefit these age groups through improved air quality.
- The provision of benches could encourage people to rest on challenging walking journeys, to dwell in local neighbourhoods for longer and to foster community

relationships and chance encounters. Inter-generational interaction is also likely to be fostered.

- Increased walking is dependent on a good quality walking environment to encourage walking. This includes wider and well-surfaced footways, fewer obstructions, many more crossing points and buildouts, street greening and seating to create welcoming streets.

On balance, for older and younger people the Streetspace scheme measures are likely to provide an overall benefit. This is because the proportion of trips made by the 65+age group by walking or buses far outweighs the proportion made private car.

Protected Characteristic: Disability

The table below from TfL London Travel Demand Surveys (LTDS) data² shows the different types of transport most used by disabled Londoners.

Proportion of Londoners using types of transport at least once a week (2016/17) [11]

%	Disabled	Disabled 16-64	Disabled 65+	Non-disabled (All)	Non-disabled 65+
Base	(1,729)	(789)	(863)	(15,831)	(1,828)
Walking	81	88	70	96	95
Bus	58	64	48	60	72
Car (as a passenger)	42	40	41	45	41
Car (as a driver)	24	26	25	39	52
Tube	21	30	13	43	35
National Rail	9	12	5	17	15
Overground	7	10	3	12	8
PHV (minicab)	10	12	8	10	4
Taxi (black cab)	3	3	3	2	2
DLR	3	5	2	5	1
Tram	2	3	1	2	2
Motorbike	-	1	-	1	1
Net: Any public transport (bus, Tube, National Rail, DLR, London Overground, tram)	61	69	52	74	78

LTDS data in this report excludes children aged under five.

Findings of the data 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).
- Public transport generally is less commonly used by disabled Londoners than n Londoners overall.
- The *Wheels for Wellbeing Annual Survey 2018* shows that 72% of disabled cyclists use their bike as a mobility aid, and 75% found cycling easier than walking, with cycling

² *Travel in London: Understanding our diverse communities* A summary of existing research, Mayor of London, TfL, 2019

improving their mental and physical health. Many more would cycle if it was made safer and easier to do so.

In addition to TfL data the charity, Transport for All, conducted a survey of disabled people affected by traffic restriction measures across London, summarised in their report *Pave the Way*³ which has informed the potential impacts on disabled people below.

Potential impacts of Streetspace measures on disabled people

- Disabled people report dissatisfaction and confusion due to a lack of consultation and information about measures implemented.
- Bermondsey Street has a 7% proportion of disabled and older people with a comparatively high car ownership rate (67%) and car dependency.
- The area has a high proportion of older disabled people likely to be reliant on their car journeys. The Streetspace scheme restrictions increase car journey times and includes transport services such as Dial- A-Ride or taxis. This includes those disabled people who use Motability and have adapted vehicles for their use. This impact is increased as the scheme affects a number of Blue Badge parking bays.
- Disabled people who use a car as a passenger and the minority of disabled people who drive would be disadvantaged. The Streetspace scheme restrictions lengthen journey times and make the journey more complex and potentially unfamiliar thereby increasing stress levels. Longer car journey times also impact disabled residents' visitors and carers, this impacts travel becoming more exhausting, expensive, complicated or difficult.
- Buses provide a more accessible form of public transport than rail or Underground for disabled people. The Streetspace scheme does not affect bus routes.
- 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.
- Increased walking by disabled people is dependent on a good quality inclusive and accessible walking environment. This includes wider, level and smooth well-surfaced footways, fewer obstructions, many more well-designed crossing points and buildouts, street greening and seating to create welcoming streets.
- Safer streets will benefit disabled cyclists and could potentially encourage more people with disabilities to try cycling, if their disability allows.
- The provision of benches may encourage people to rest on challenging walking journeys, to dwell in local neighbourhoods for longer and to foster community relationships and chance encounters. Inter-generational interaction is also likely to be fostered. Rest facilities may encourage more people to undertake walking journeys, in the knowledge that the journey can be broken up into more manageable chunks.
- Disabled people report that the most immediate barrier to active travel journeys is the inaccessibility of the street (footways and cycle paths), lack of resting places and poor signage.

³ Pave the Way: The impact of low traffic neighbourhoods on disabled people, and the future of accessible travel, Transport for All, January 2021

- Many disabled people report genuine and meaningful benefits from the Streetscape changes including:
 - easier or more pleasant journeys.
 - an increase in independence.
 - a decrease in traffic danger and
 - benefits to physical and mental health.

Protected Characteristic: Sex and Pregnancy/Maternity

Transport for London data (2019) indicates:

- Walking is the most 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.

Potential impacts of Streetspace measures on parents and women

- Women as car passengers or drivers are likely to be negatively impacted by longer car journeys. This is likely to include women with child-caring responsibilities and those who need to make frequent household related journeys while carrying shopping and equipment.
- 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.
- Women may be adversely affected by increasing levels of motor traffic on the perimeter of Streetspace schemes, as the traffic may be diverted from the short-cut routes to the main roads.
- Women make four times more escort education trips than men and may be disproportionately affected if carrying shopping or travelling with children within the streetscape areas, due to longer walking journeys.
- More women may be encouraged to take up cycling with a safer environment created.
- Women may have an increased perception of road safety within the Streetscape area and a decreased perception outside the area. Traffic speeds within the area may increase, due to the lower levels of traffic.
- Women may have an increased perception of personal safety if there is a higher footfall and dwell time in the area, dependent on the nature of the people and the opportunities for surveillance and escape.
- Women may consider that the absence of vehicular traffic, including police vehicles, will increase opportunities for crime, with faster escape possible by bicycles and scooters.
- Parents are likely to perceive a higher level of road safety for children, with increased opportunities for children to use the streetscape for play.

Protected Characteristic: Race - Black, Asian and Ethnic Minority groups

TfL data (2019) indicates:

- Walking is the most commonly used type of transport by BAME Londoners. (96% of BAME Londoners walk at least once a week compared with 95% of white Londoners.)
- After walking, the most commonly used type of transport by BAME Londoners is the bus (65% BAME compared with 56% white Londoners) Black Londoners using the bus at least once per week is significantly higher at 73%.
- The use of cars among BAME Londoners is lower than for white Londoners; 32% of BAME Londoners drive a car at least once a week compared with 41% of white Londoners (33% and 43% respectively in 2013/14).
- Cycling levels of BAME Londoners and white Londoners are very similar. Seventeen per cent of BAME Londoners cycle in London at least sometimes compared with 18% of white Londoners.

Potential impacts of Streetspace measures on BAME groups

- The measures are likely to improve conditions for pedestrians, by reducing motor traffic and therefore conflicts with motorised vehicles.
- 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.

Overall Black, Asian and Minority Ethnic (BAME) people were more likely than White Londoners to live in a new modal filtered area. Car-free households were more likely to live in a new modal filtered area.

Another contribution that Streetspace could make to social equity is reducing inequality in injury risk. London's Black children are more at risk from pedestrian injury than its white or Asian children, while Black Londoners are less likely to own cars than white or Asian Londoners. If modal filtered areas are introduced in neighbourhoods with a demographic mix suffering high traffic injury risk, they may help redress these inequalities and provide safer environments and public space for those most disadvantaged by the current situation.

On balance, the Streetspace scheme measures are likely to provide an overall benefit. This is because the proportion of trips made by all ethnic groups using modes that will benefit from the measures outweighs those using modes that may be adversely affected.

Potential impacts on lower income groups

- Women, disabled people, BAME 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) in line with all Londoners (95%).
- 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.
- The proportion of Londoners with access to at least one car falls with decreasing household income, so that 73% of Londoners in the lowest household income bracket (less than £5,000) do not have access to a car compared with 35% of all Londoners
- 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.
- 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 low income groups who are more likely to use buses.

9. CAE accessibility overview of Bermondsey Street Streetscape measures

Site visits were carried out by CAE in October and November 2021. In general it was noted that the environment was more conducive for walking and cycling than was previously the case, due to reduced traffic volumes within the Bermondsey Street streetscape area. The main strategic roads to the North East of the area were busy and polluted.

The area is characterised by narrower streets than other areas in Southwark, with narrower pavements and some cobblestoned areas. With the exception of pavement hospitality tables and chairs along some of the wider pavement sections, there was a general lack of rest seating of Bermondsey Street.

A number of cyclists were evident in the area, generally keeping to the main cycle lanes in the modal filter area rather than the pavements. It was clear that Bermondsey Street had become a desire line route for cyclists travelling through the area and for people visiting the shops and businesses in the area.

The main accessibility issues with main and residential streets are outlined below:

Bermondsey Street and roads leading from it

Bermondsey Street was observed from the southern to northern end at a variety of times of the day. The highway and pavement vary, with some wider sections with seating and street furniture to the sides and generally a narrower section along most of the length of the road. Road crossings via dropped kerbs were in reasonable condition, without crossing controls.



Southern end of Bermondsey Street, at the junction with Abbey Street. A metal bell blocks the dropped kerb on the corner. Vehicles can enter the street at this point.



Scaffolding on the pavement at the junction with Newham's Row forces walkers into the road.



At the junction with Tanner Street the modal filter is in place. Some bicycles, A boards etc are left on the pavement, although mostly provide a clear pedestrian route.

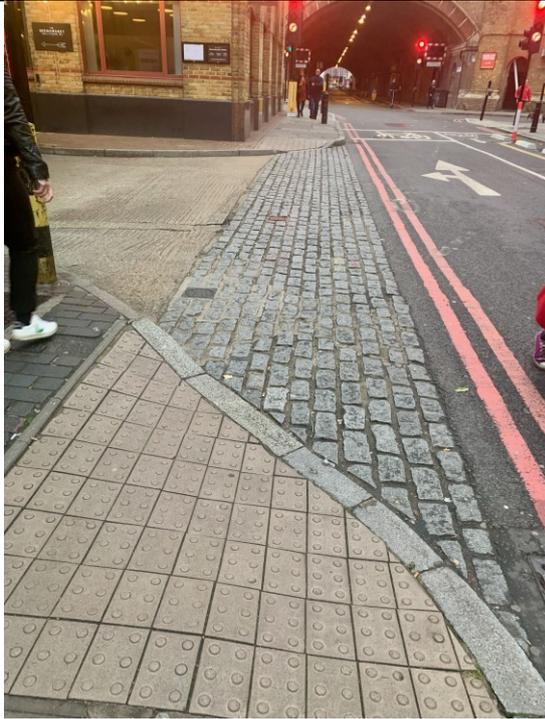


Some local businesses have adapted to the modal filters by switching to cargo bikes to move goods around the area.



Some side roads are less suitable for safe walking, such as Newham's Row.

Some dropped kerb crossings further North are less even, such as at Black Swan Yard.



Cobblestones at the northern street end.



Junction of Snowfields, and St Thomas Street, leading to the primary school. Crucifix Lane, where the largest traffic volume increase was recorded, here at the junction with Snowfields.



Snowfields, outside the primary school, with wider pavements and a large number of hire cycles.



The road leads under the railway arch up to the junction with Tooley Street.

A taxi lay-by is located at the far north of the street, at the junction with Tooley Street.

10. Conclusion and recommendations

This review is the start of co-evaluation of the scheme with Southwark Council, residents and relevant stakeholders.

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. There will be some negative impacts on residents travelling by car, as routes will be indirect, complex and longer. However, all homes and businesses will still be able to be accessed by vehicles.

The consultation feedback from residents is generally in favour of the streetspace measures in Bermondsey Street, with some improvements, including an expansion of the closure along the length of Bermondsey Street, more seating and community spaces and more cycle parking. Measures are likely to have a positive impact on reducing inequalities, especially as the largest proportion of trips in the area are made by walking, cycling and buses as car ownership levels are low (54% of residents do not own a car). It is worth noting that

- People who responded negatively to the consultation were predominantly car owners who perceived they were negatively impacted by the traffic restrictions. The area has a relatively low percentage of car owners.
- Businesses did not generally see the benefits of the scheme, although local people reported using local businesses more.

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

Recommendations

1. Continued engagement with protected groups in particular, older and disabled people and representatives to ensure that their concerns are being heard, understood and addressed.
2. 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.
3. 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. Restriction of motor traffic needs to go hand in hand with improving the accessibility of the street environment. Barriers to walking and cycling within the existing street environment should be addressed. The public consultation indicated that the street environment in Bermondsey is not conducive for walking in many areas. Poor surfaces, narrow pavements, lack of seating and cyclists and scooters on pavements were reported. Disabled people often feel excluded from exercise and active travel. A full 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 in appropriate areas.
4. Mobility impaired people and people with neurodiverse conditions need regular rest and seating points along streets. A greener street environment will provide mental health benefits.
5. Continued effective monitoring by Southwark Council of:
 - a. motor traffic levels
 - b. active travel: walking, and cycling levels
 - c. bus journey times

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

6. Further focused consultation is required with Snowsfields school to work out ways to mitigate any negative impacts reported, the dislike for the scheme and enhance positive impacts of Streetspace measures.
7. Spaces around Snowsfields school to be prioritised to promote active travel by children and low traffic pollution levels.
8. A review of the impact of the Streetspace measures on existing Blue Badge parking bays, as they have been directly impacted by new modal filters and increased traffic routes, for example in Tanner Lane.

9. Extension of the Blue Badge exemption across the borough to allow holders to reach essential or specialist services more easily round the borough.
10. 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.
11. 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.
12. Better provision of accessible facilities at local shopping streets, including suitable accessible car and cycle parking for disabled people, accessible toilets, and consideration of an adult Changing Places toilets.
13. Greater awareness of and provision of targeted cycle training and cycle storage to make it easier for those protected groups who can cycle.
14. Liaison with neighbouring boroughs to address problems on boundary streets, including St Thomas Street, Crucifix Street and Long Lane.
15. Further engagement with essential workers, private transport hire and night-time workers, needs to be considered to mitigate impact on their travel modes.
16. 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.

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.

These measures if implemented carefully, with effective monitoring of motor traffic levels and potential traffic displacement, monitoring of walking and cycling levels and bus journey times, with active engagement of local people and addressing negative impacts, could be a positive response to the Covid-19 pandemic crisis that impacts most on disadvantaged communities and groups.

11. Appendices

Appendix 1 - Streetspace measures impact and evidence from similar schemes

Streetspace measures and general impact on equity in London

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.

Streetspace schemes can create streets where pedestrians may use more of the carriageway in addition to the footways which could be narrow and crowded. During the Covid-19 pandemic, Streetspace schemes specifically aim to provide more physical distancing space, especially with a rise in jogging and walking on sometimes narrow footways. With lower volumes of motor traffic, streets become usable by people walking in their entirety. In a typical residential street this may double or triple usable pedestrian space.

However, the space is only usable insofar as it is accessible to disabled people, as wheelchair users and mobility impaired people cannot easily move on and off high kerbed footways.

Restriction of motor traffic needs to go hand in hand with improving the accessibility of the street environment including footway obstructions and clutter, ensuring pavements are smooth, level and firm, and adequate safe crossing points are provided with dropped kerbs. Mobility impaired people and people with neurodiverse conditions need rest and seating points along streets.

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 deprivation areas in relation to new Streetspace measures

A spatial analysis of new traffic measures that was conducted in February 2021⁴, 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) in table below.

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.

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%
Harlow	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.

Streetspace measures - evidence from previously implemented schemes elsewhere

Evidence from existing motor traffic restriction measures indicates that these were associated with more active travel, reduced car ownership, lower road injury risk, and reduced street crime.

The London Borough of Waltham Forest has implemented growing numbers of these neighbourhoods since 2015. A post-implementation survey⁵ found that

⁴ Equity in new active travel infrastructure: a spatial analysis of London's new Low Traffic Neighbourhoods, February 2021

⁵ 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

- 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 study⁶ 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.

This 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.

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;

⁶ *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 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.
- 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.

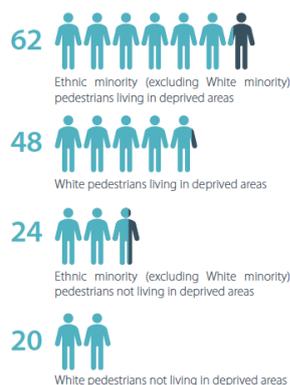
Research has shown how **negative impacts of motorised transport are usually unevenly distributed**, with vulnerable communities disproportionately affected by transport-related air pollution, traffic collisions and ill-health due to lack of exercise.

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 2021⁷ 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.

⁷ The Impact of Introducing Low Traffic Neighbourhoods on Road Traffic Injuries, Lavery, Anthony A, Aldred, Rachel and Goodman, Anna, *Findings*. January 2021. <https://doi.org/10.32866/001c.18330>

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.

It is likely that Streetspace measures, by improving road safety are likely to benefit BAME and low-income households who are particularly impacted by road traffic collisions.

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 motor traffic levels across an area can happen as a result of people making a wide range of behavioural responses to the new traffic configurations⁸

The most comprehensive study⁹ 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 traffic¹⁰.

King's College London research¹¹, 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.

⁸ 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/>

⁹ 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

¹⁰ 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/>

¹¹ Air Quality: concentrations, exposure and attitudes in Waltham Forest, David Dajnak, Heather Walton, Gregor Stewart, James David Smith and Sean Beevers, 2020

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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**

adjustments⁸ in order to avoid a disabled person being placed at a **substantial disadvantage**⁹ 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

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 providers^a 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

⁸ The EA does not prescribe what a reasonable adjustment might be – this is to be determined by the particular circumstances in each case.

⁹ Anything that is more than minor or trivial

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.

^A Southwark Council is an Equality Act service provider

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.

Public Sector Equality Duty

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;
- 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:

- Education and Inspections Act 2006 which requires all local authorities to promote the use of sustainable travel to, from and between schools as part of the duty of the Education and Inspections Act 2006. Sustainable travel includes modes that may improve the physical well-being of those who use them, the environmental well-being of all or part of the local authority's area, or a combination of the two.
- Health and Social Care Act , 2014 in which there is a duty for local authorities to promote wellbeing (physical, mental and emotional) when carrying out any of their care and support functions in respect of a person.
- 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.

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.

Document History

Version	Date	Author	Checked By	Description of Changes
1.0	22/11/21	CAE HK	CAE FM	First issue
1.1	28/11/21	Formatting	CAE	LB Southwark 1 st issue
1.2	30/12/21	CAE	CAE	Minor amends on format 2 nd issue to Southwark

Quality Assurance

Review	Name	Notes	Date
Author	CAE HK		22/11/2021
Peer Review	CAE FM		05/12/2021
Approved By			xx/xx/2021

Appendix 4 CAE Terms and conditions

Terms and Conditions

- 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
- 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.
- 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
- 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.
- 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
- 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.
- 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.
- 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;
- 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.
- 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.
- 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.
- 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.
- 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.