



Centre for Accessible Environments

T 020 7822 8232

info@cae.org.uk

www.cae.org.uk

Twitter: @CAE\_Info

# Transport Strategy Equality Impact Assessment

## City of London Corporation

Issued May 2023

Updated September 2023

CAE reference: 2023J506

### Report Review

Date	Version	Authors	Notes	Reviewed by
15.05.23	1.3	CAE	EQIA V1 for review	Strategic Transport
14.06.23	1.6	CAE	EQIA V1 Final	Strategic Transport
23.08.23	1.7	CAE & City Corporation	Reviewed in line with proposed major changes to Proposals	Strategic Transport
30.08.23	2.1	CAE & City Corporation	Reviewed in line with all proposed changes to Proposals	CAE
31.08.23	2.2	CAE	Reviewed changes	Strategic Transport
02.09.23	2.3	City Corporation	Reviewed changes	Strategic Transport
12.09.23	2.4	City Corporation	EQIA V2 Final signed off and published	Approved by Bruce McVean, Assistant Director, Policy & Projects

*Note: CAE are not legal experts and, as such, this review is not a definitive legal view but an assessment of the equality impact of the Transport Strategy.*

## Contents

<b>The Brief</b> .....	<b>3</b>
<b>Executive Summary</b> .....	<b>4</b>
<b>Legislative Context</b> .....	<b>6</b>
<b>City of London Transport Strategy</b> .....	<b>9</b>
<b>Protected groups in the City of London</b> .....	<b>11</b>
<b>Travel Modes within the City of London</b> .....	<b>13</b>
<b>Barriers to transport use by protected groups</b> .....	<b>16</b>
<b>Detailed EQIA analysis of the Strategy and Proposed Changes</b> .....	<b>19</b>
<b>The Strategy Vision</b> .....	<b>19</b>
<b>Strategy Outcomes and Proposals</b> .....	<b>19</b>
Overarching Strategy Proposal.....	20
Outcome: The Square Mile’s streets are great places to walk and spend time .....	22
Outcome: Street space is used more efficiently and effectively .....	29
Outcome: The Square Mile is accessible to all .....	34
Outcome: People using our streets and public spaces are safe and feel safe .....	37
Outcome: More people choose to cycle in the City .....	40
Outcome: The Square Mile’s air and streets are cleaner and quieter .....	44
Outcome: Delivery and servicing needs are met more efficiently, and impacts are minimised .....	48
Outcome: Our street network is resilient to changing circumstances .....	49
Outcome: Emerging transport technologies benefit the Square Mile .....	51
Outcome: The Square Mile benefits from better transport connections.....	52
Delivering the Strategy .....	55
<b>Partnerships and leadership</b> .....	<b>56</b>
<b>Conclusion</b> .....	<b>56</b>
<b>Recommendations</b> .....	<b>57</b>
<b>Next Steps</b> .....	<b>58</b>

## The Brief

The Centre for Accessible Environments (CAE) has been appointed by the City of London Corporation (City Corporation) to conduct an Equality Impact Assessment (EQIA) of the Transport Strategy<sup>1</sup>. The Strategy provides a 25-year framework for the design and management of the City's streets and was adopted in May 2019. It is undergoing its first review since being published to ensure it meets the needs of those who live, work and visit the City of London.

An initial EQIA (V1) was drafted by CAE in May 2023, which builds on the initial IIA study of the Strategy completed by LUC<sup>2</sup>. The review by CAE considered the potential impacts on people with protected characteristics – negative and positive – when considered against the general Public-Sector Equality Duty (PSED) and provisions within the Equality Act 2010. Equality issues considered include both direct and indirect effects from the transport policies upon the City's population, and particularly groups that share protected characteristics as defined under the Equality Act 2010, as appropriate and proportionate based on their likelihood to impact equality. The EQIA also identified opportunities to improve inclusion and consideration of protected groups within policies and actions.

Since the first draft of this EQIA was issued by CAE in May 2023 the City Corporation has engaged with a range of stakeholders on the Strategy and propose to make several changes to the Outcomes and Proposals within it. Many of which, look to mitigate the potential negative impacts previously identified. These changes are welcomed and include updating, removing and introducing new Proposals to the Strategy.

CAE has had sight of the proposed changes (as of August 2023) and this EQIA has been updated in partnership with the City Corporation to review the mitigations and possible impacts of the proposed major changes to the Strategy on people with protected characteristics.

The draft Strategy Proposals will be presented to various stakeholders and City Corporation Committees for approvals from September, before going to public consultation later this year. A final EQIA report will be published following the public consultation and ahead of publication expected in 2024.

---

<sup>1</sup> Referred from hereon as the 'Strategy'.

<sup>2</sup> <https://www.cityoflondon.gov.uk/assets/Services-Environment/city-of-london-transport-strategy-IIA.pdf>

## Executive Summary

The Transport Strategy provides a positive framework, within the context of the transport system, to eliminate discrimination, harassment, victimisation, advance equality of opportunity and foster good relations between people with or within individual protected characteristics thus meeting the PSED.

The most notable and relevant change to the Strategy since the initial EQIA is the development of an 'Inclusivity specific Proposal', which acts on the following recommendations made in the first EQIA issued in May 2023:

- The Strategy's vision does not relate directly to creating an inclusive transport system contributing to a more equitable society.
- A more rigorous emphasis on 'inclusion', and 'reducing inequality between groups' would be helpful and embed the concept within the document.
- A commitment to advancing equality of opportunities across protected characteristics is not specifically embedded in the strategic framework of the Strategy, referenced directly in the Outcomes underpinning the Vision.
- The Strategy's Outcomes have not specifically been designed to address challenges specifically including the need to eliminate discrimination based on gender and disability and to foster strong community relations.
- Improvements to the transport system leading to improved health and well-being can be expected to impact all people living, visiting and working in the City, with resulting reductions in inequality, though not explicitly stated as an aim.
- The language within the Strategy could be more inclusive. Inclusiveness goes beyond physical accessibility to include needs of other protected groups to reduce inequality between groups.

**Following the review of the major changes to the Strategy the EQIA identified several potential positive impacts on protected groups:**

- The proposed change to the Vision now will state "*Streets that inspire and delight, world-class connections and a Square Mile that is inclusive and accessible to all*". This is an improvement, and we recommend that the Vision go further and add '*contributes to a more equitable society*' or "*inequality in the transport system is reduced*".
- Reference to people walking throughout the Strategy has been updated to include people who use mobility aids and will state that 'The Square Mile's streets are great places to walk, **wheel** and spend time'.
- The addition of a Proposal on inclusivity, which is cross cutting across all Proposals will be a welcome addition to support creating inclusive spaces, streets, and transport.

- It is expected that the City Corporation's Transport Strategy will contribute to greater accessibility and equality, particularly health equality, in the City of London.
- Reflecting the high level and strategic purpose of the document, all components of the Transport Strategy have been designed to be universal, rather than to target specific demographic groups.
- The objectives have the potential to transform the City's streets and places to enable an increase in walking, wheeling and cycling, to deliver a transport system and streets that are accessible and inclusive for all.
- The Strategy aims to reduce and mitigate the impact of transport-based emissions and noise in City which will benefit many protected groups.
- The Strategy is intended to help make homes, jobs, shops, institutions and services more accessible and to promote sustainable transport choices. In general, this means prioritising cycling, wheeling and walking in the layout and design of new development, discouraging car use, restricting the amount of parking to the minimum. This approach is intended to promote healthier lifestyles and reduce carbon emissions arising from car use and dependency on fossil fuels.
- The Strategy benefits all members of the community. Car ownership levels tend to be lower among the young and elderly and poorer groups. Therefore, a policy which seeks to promote walking and cycling, creating routes which are safe from conflict with vehicles, which prioritises non-car users, and which also maximises opportunities to use public transport should benefit these groups, promoting inclusivity and equality of access to jobs, services etc.

**Potential negative impacts on protected groups arising from the Strategy which require consideration:**

- The Strategy promotes a reduction in car usage and there are certain protected groups who may rely on using a car and are unable to participate in active travel. This might include the elderly, people with disabilities and parents with young children. Any reduction in car use and parking and promotion of sustainable modes of transport should be undertaken in tandem with improvements in public transport and the public realm which is explicitly stated in the Strategy.
- While in theory promoting walking, wheeling, and cycling is beneficial to all users, if routes are poorly lit, secluded and at risk from conflicts with road vehicles, a reduction in car parking may discourage people from going out and make people feel more isolated. This could particularly apply to vulnerable groups such as the elderly and young, people with disabilities, women and LGBT groups.

# 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.

On 1 October 2010, the Equality Act 2010 (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

## Duties under the Equality Act

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<sup>3</sup> 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:

---

<sup>3</sup> City Corporation is a service provider under the Equality Act

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

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

The Equality Act 2010 requires that service providers must think ahead (anticipate) and take steps to address barriers that impede disabled people. Providers should not wait until a disabled person experiences difficulty using a service, as this may make it too late to make the necessary adjustment. It is no longer necessary to show that the provider's practice etc. makes it 'impossible or unreasonably difficult' to access the service - the test is whether the practice places the disabled person at a "substantial disadvantage"; legally this is a lower threshold for action. In summary, service providers are required to:

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

## **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\*\*

\*\*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.



# City of London Transport Strategy

The City of London, also known as the Square Mile, is the historic heart of London and one of the world's leading financial and business centres. Office for National Statistics (ONS) mid-2019 estimates indicate a residential population to 9,700 people while the 2018 workforce was estimated to be 522,000. The working population is almost 50 times the usual residential population which demonstrates significant movement in and out of the City every day. In addition, the City also takes in over 10 million tourists, in addition to those visiting for business. The City of London shows the highest workplace density in all of Greater London with the primary land use in the City being offices, which make up more than 70% of all buildings.

## Background: Importance of the Transport Strategy to the City

How people and goods travel to and around the City has a significant impact on the experience of living, working, studying in or visiting the Square Mile. Facilitating the safe, clean and efficient movement of people and vehicles serving the City, alongside improving the quality of streets and public spaces, is considered essential to ensuring the continued success of the City as a global centre for business and cultural destination.

As the highway authority, the City Corporation is responsible for the management of most streets within the City of London. Transport for London (TfL), the integrated transport authority for Greater London, manages the Transport for London Road Network (TLRN, also known as 'Red Routes'), of which there are several miles within the Square Mile. TfL also manages and operates London's public transport, the Congestion Charge and Emission Zones.

The City is well connected by public transport. TfL rates the whole of the Square Mile as having a Public Transport Accessibility rating of above 6 – the highest possible score. This is made possible by an extensive public transport network with six mainline railway stations, 12 Underground and DLR stations and a high density and frequency of bus services. However, a high PTAL rating does not necessarily equate to an accessible transport service as many of the train stations are not step-free. The PTAL rating does not factor into its calculations whether a train or underground station is accessible, nor does it factor in the crowding (including ability to board services) or ease of interchange, both factors which are of major significance to people with limited mobility needing to rely on public transport for their journey.

The City's Transport Strategy and initiatives in the past demonstrate a clear shift away from motor traffic priority to pedestrian and active travel design priority, from the Ring of Steel initiatives in 1990s on to significant Bank Junction changes over the

last 15 years with 90% of guard railing removed and over 100 courtesy crossings introduced.

## **Review of aims of the Transport Strategy**

The Strategy provides a 25-year framework for future investment in and management of the City's streets, as well as measures to reduce the social, economic, and environmental impacts of motor traffic and congestion. It also sets out our aspirations for improvements to the TLRN and local, national, and international transport connections.

The current Foreword in the 2019 Strategy sets out a priority for walking and for 'making streets more accessible'. It also sets out intention to reducing traffic speeds and road danger and pollution, all of which beneficially impacts disabled people, older people and children. It states 'As the City grows it will be essential to reduce motor traffic and facilitate the movement of people by the most efficient modes of transport. Reductions in traffic will also help improve air quality and make our streets safer'. Although these travel trends are likely to continue in the future, but only if walking, cycling and using public transport are convenient, attractive, inclusive and safe ways to travel.

Cycling has been made safer and more convenient by introducing two-way cycling across City streets, lower speed limits and dedicated cycling infrastructure. More traffic free public space has been created through many projects, removing traffic gyratory and creating traffic free public spaces.

The development of this Strategy was informed by extensive engagement with the public and organisations with an interest in transport in the Square Mile. This engagement was undertaken by the City Corporation during Feb and March 2018 included a survey of almost 2,000 people, this included a City Streets exhibition visited by 7,000 people, and stakeholder workshops attended by 77 people. Respondents to the City Streets survey who identified as having a disability or long-term health conditions, highlighted particular concerns;

- poor air quality
- motor traffic volumes
- public transport crowding.

One of the key themes emerging from this first phase of engagement was that the stakeholders feel more needs to be done to improve accessibility in the Square Mile.

## Protected groups in the City of London

The Square Mile's workforce is forecast to increase to 570,000 by 2030 and to over 620,000 by 2044. The residential population will also grow, with nearly 3,000 more people living in the Square Mile by 2044. Population growth was significantly higher in the City of London than across London between the 2011 Census to Census 2021; England ▲6.6% London ▲7.7% City of London ▲16.4%

The Strategy will need to address this growth as more people will be travelling on the City's streets, and in particular more people from protected groups walking, and increased demand for high quality public spaces. More residents, workers and visitors will also mean more deliveries and servicing of offices, homes, shops, pubs, cafes and restaurants.

### Key City statistics: Age

Data from the 2021 Census<sup>4</sup> indicates that 77% of residents are aged 19 – 65 years, with 14% over 65 years and 9% aged 19 years or under.

Age (2021)	%
85 years and over	1.4
75 to 84 years	4.3
65 to 74 years	8.3
50 to 64 years	18.8
35 to 49 years	21.2
25 to 34 years	25.8
20 to 24 years	11.2
16 to 19 years	2.2
10 to 15 years	2.4
5 to 9 years	1.9
4 years and under	2.5

### Key City statistics: Sex

The City of London has the lowest proportion of women compared to men; within the City with 45% of residents are women. At the time of the 2011 Census the usual resident population could be broken up into 4,091 males (55.5%) and 3,284 females (44.5%).

---

<sup>4</sup> Office for National Statistics 2021 Census  
<https://www.ons.gov.uk/visualisations/censusareachanges/E09000001/>

Of the total workforce of the City of London of 356,706, some 218,585 are males (61%) whilst 138,121 are females (39%).

### **Key City statistics: Religion**

In 2021, 34.7% of people in the City of London described themselves as Christian (down from 45.3%), while 43.8% of City of London residents reported having "No religion".

### **Key City statistics Disability**

The 2021 Census reported;

- 56.6% of City of London residents described their health as "very good", and those describing their health as "good" was 31.2%.
- 7.9% of people identified as being disabled and limited with 3.9% identified as disabled and limited a lot.
- Data from TfL (2019) states that % of disabled residents is 17% for City of London<sup>5</sup>

### **Key City statistics: Race**

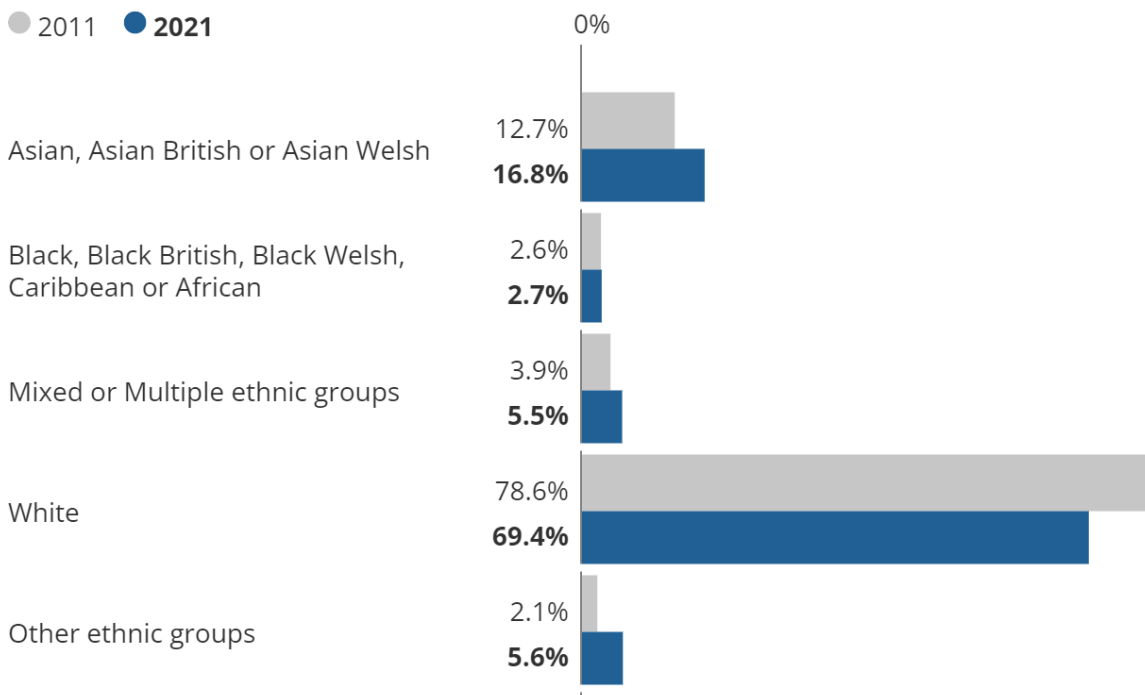
The City of London's resident population is predominantly white (69.4%).

- 21% are BAME residents.
- In 2021, 16.8% of the City of London residents identified their ethnic group within the "Asian, Asian British or Asian Welsh" category, up from 12.7% in 2011. The 4.1 percentage-point change was the largest increase among high-level ethnic groups in this area.
- The City has a relatively small Black population- considerably lower than the Greater London wide figure of 13.3% and smaller than the percentage for England and Wales of 3.3%
- Children and young people from minority ethnic groups account for 41.71% of all children living in the area, compared with 21.11% nationally.

---

<sup>5</sup> <https://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf> page 209

## Percentage of usual residents by ethnic group, City of London



Source: Office for National Statistics – 2011 Census and Census 2021

## Travel Modes within the City of London

The extensive *TfL RESEARCH: Understanding travel needs of London's diverse communities*<sup>6</sup>, covers the City's population. This document sets out in detail a collection of research which has been undertaken to identify the different barriers faced by London's communities when accessing transport. It also describes travel patterns, the behaviour of different groups and attitudes towards issues such as fares, personal safety and security and satisfaction with the services offered.

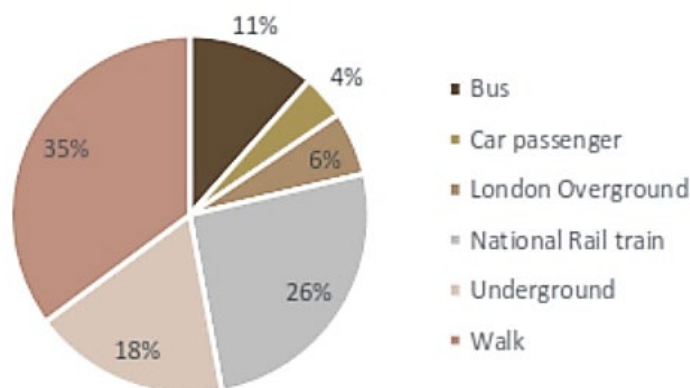
- 93% of commuter travel to the Square Mile is by public transport (84%), walking (5%) or cycling (4%). Walking is by far the main mode of travel within the City, with over 750,000 walked journeys a day.
- Fewer than 5% of City workers drive to work.
- When comparing to the TfL London Travel Demand Surveys<sup>7</sup> (LTDS) mode split of trips made by all people, bus use for those with disabilities is twice as high (11% compared to 5%), car trips are higher and used as passenger only

<sup>6</sup> <https://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>

<sup>7</sup> <https://www.clocs.org.uk/wp-content/uploads/2014/05/london-travel-demand-survey-2011.pdf>

(4% compared to 2.5%) and walking is significantly higher (35% compared to 25%).

Mode split by those with with a physical or mental disability affecting daily travel (including old age)



- Those aged 65+ have a higher mode split of walking and bus compared to the baseline, with no cycling and higher car use.
- TfL data, for Greater London, shows that bus use among Black, Asian or Ethnic Minorities (BAME) Londoners is higher at 65% compared with 56% of white Londoners who use the bus at least once per week. Black Londoners using the bus at least once per week is significantly higher at 73%
- Disabled Londoners and Londoners aged over 65 use the Tube less than other groups on a weekly basis.
- 1.7% of the residential population in the City are blue badge holders, which is in the bottom five local authorities for number of blue badges across the United Kingdom<sup>8</sup>.
- In recent years investment in cycling infrastructure has resulted in an estimated tripling in the number of people cycling in the Square Mile. People cycling now make up a quarter of vehicles and this figure can rise to over 50% on major streets during rush hour<sup>9</sup>.
- Focusing solely on cyclists who have a disability, the Wheels for Wellbeing annual survey shows that 72% of disabled cyclists use their bike as a mobility

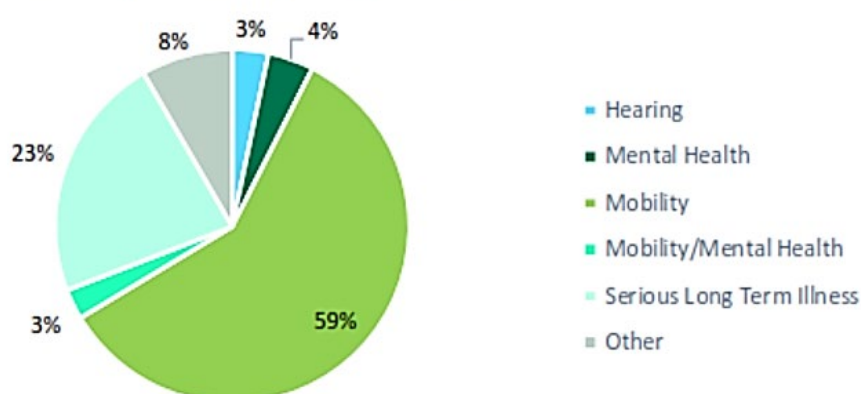
<sup>8</sup> <https://www.clocs.org.uk/wp-content/uploads/2014/05/london-travel-demand-survey-2011.pdf>

<sup>9</sup> Steer May 2020 Baseline and Assessment COVID response v8 report

aid, and 75% found cycling easier than walking. Survey results also show that 24% of disabled cyclists bike for work or to commute to work and many found that cycling improves their mental and physical health. Inaccessible cycle infrastructure was found to be the biggest barrier to cycling.

- 72% of disabled cyclists use their bicycle as a mobility aid and 75% found cycling easier than walking<sup>10</sup>.
- 1.8% of trips made into the City of London are made by someone who has a mental or physical disability affecting daily travel (including old age)<sup>5</sup>. Mode split for these trips is shown in the figure below.
- When comparing to the LTDS mode split of trips made by all people, bus use for those with disabilities is twice as high (11% compared to 5%), car trips are higher and used as passenger only (4% compared to 2.5%) and walking is significantly higher (35% compared to 25%). Disability types stated by those who have a disability affecting daily travel (including old age) is shown below.

Disability types stated by those who have a disability affecting daily travel



This indicates that mobility impairment represents the highest proportion followed by impairment due to serious long-term illness. It should be noted that this data is based on a very small sample (1.8% of sample size for trips ending in the City of London), therefore results should be taken as general.

<sup>10</sup> Steer May 2020 Baseline and Assessment COVID response v8 report

## Barriers to transport use by protected groups

TfL has identified seven groups of Londoners who experience a variety of barriers when accessing public transport:

- Black, Asian and minority ethnic groups (referred to as BAME)
- Gender (women and men) – We recognise that there may be barriers to transport faced by some transgender women and men, however we do not yet have sufficient data to provide a detailed analysis
- Older Londoners (aged 65 and over)
- Younger Londoners (aged 24 and under)
- Disabled Londoners – visible and/or hidden mobility, sensory and cognitive impairments
- Londoners on lower incomes (household income of less than £20,000 per year)
- Lesbian, gay and bisexual Londoners (referred to as LGBT)

### Black, Asian and Minority Ethnic (BAME) Londoners

Walking is the most commonly used type of transport by BAME Londoners (96 per cent of BAME Londoners walk at least once a week).

After walking, the most commonly used type of transport by BAME Londoners is the bus (65 per cent BAME compared with 56 per cent white)

BAME Londoners are more likely to be classified as ‘worried’ while using public transport and to have experienced a specific worrying incident in the past three months when travelling.

### Gender

Walking is the most used type of transport by women (95 per cent walk at least once a week). Women are more likely to use buses than men (62 per cent compared with 56 per cent), but are less likely to use other types of transport including the Tube (38 per cent women compared with 43 per cent men)

Women are more likely than men to be travelling with buggies and/or shopping, and this can affect transport choices.

Women are more likely than men to experience worrying incidents when travelling on public transport and are more likely to be deterred from using public transport more often by a number of different barriers.



## **Older people**

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, which is the next most frequently used method of travel.

43 per cent drive a car at least once a week and 41 per cent travel by car as a passenger at least once a week.

Older Londoners (14 per cent) are less likely than Londoners overall (30 per cent) to say they are worried about their personal security when using public transport. They are also less likely to have experienced a specific incident of worry when travelling in the past three months.

## **Younger people**

Walking is the most commonly used type of transport by younger Londoners (97 per cent aged 24 and under walk at least once a week compared with 95 per cent all Londoners)

Younger Londoners cite similar barriers to greater public transport use as all Londoners: overcrowding, slow journey times and cost

## **Disabled people**

In the City of London as a whole, 89% of the residents feel they have no limitations in their activities – this is higher than both in England and Wales (82%) and Greater London (86%).

The most commonly used types of transport by disabled Londoners are walking (81 per cent of disabled Londoners walk at least once a week), the bus (58 per cent) and car as the passenger (42 per cent).

However, 65% of disabled Londoners consider the condition of pavements to be a barrier to walking more frequently.

London-wide the proportion of disabled Londoners who travel by Underground and National Rail is considerably lower than for non-disabled Londoners. Gaps in the step-free public transport network mean that a step-free journey is on average 11 minutes slower than a journey using the full network.

Disabled customers also see accessibility-related issues, cost and comfort as barriers to travel.

People with dementia experience difficulties using transport alone. Travellers with dementia may have difficulty with routes, dealing with money, or interacting with other passengers.

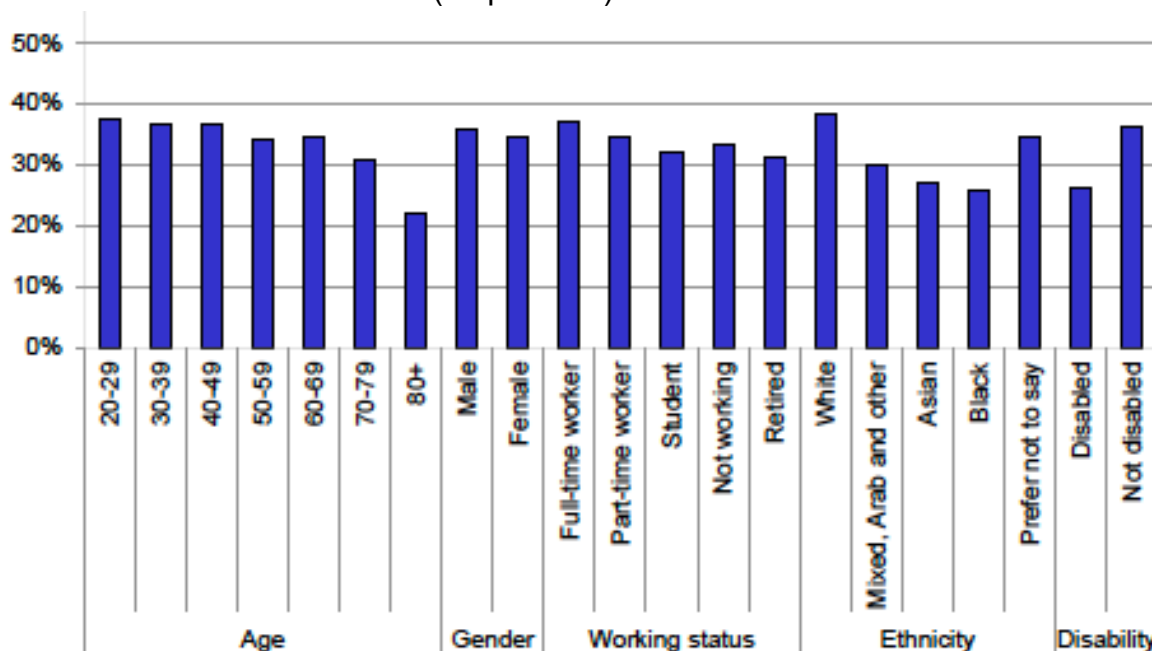
### People on lower incomes

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).

The bus is the next most common type of transport used by Londoners on lower incomes (69 per cent use the bus at least once a week, compared with 59 per cent of all Londoners).

The TfL LTDS 202/21 survey reports on who are more likely to achieve 20 minutes of active travel. This is White, working (particularly those who work full-time), are not disabled and are in younger age groups. The rate of achievement decreases with age, partly driven by a lower frequency of travel among older people. By ethnicity, White residents (38 per cent) are much more likely to meet the target than any other group, with achievement among Black residents the lowest at 26 per cent. There is also a considerable difference between disabled residents (26 per cent) and residents who are not disabled (36 per cent).



Source: TfL City Planning.

# Detailed EQIA analysis of the Strategy and Proposed Changes

## The Strategy Vision

The Strategy supports the City's Corporate Plan's aims of ensuring streets are accessible to all and provide an attractive space for the City's diverse community to come together. Other aims while not explicitly stated, impacting on equality and diversity include improving safety and reducing traffic casualties, improving air quality, all of which beneficially impact older people, disabled people, women and children and BAME communities. However, the current Vision states: "*Streets that inspire and delight, world-class connections and a Square Mile that is accessible to all*". 'Inclusiveness' which goes beyond accessibility is not mentioned.

### Actions taken by the City Corporation

The City Corporation proposes to change the vision to:

*"Streets that inspire and delight, world-class connections and a Square Mile that is **inclusive** and accessible to all"*.

This is a welcomed improvement. People both reading and delivering the Strategy will feel more included in the process, giving them more confidence that their voices will be heard in decision-making.

The vision could go further and add "contributes to a more equitable society" or "inequality in the transport system is reduced".

## Strategy Outcomes and Proposals

The Strategy sets out a series of ten Outcomes and 54 Proposals to achieve its aims. Since the initial EQIA was issued by CAE in May 2023 the City Corporation has engaged with a range of stakeholders on the Strategy and now proposed to make several changes, which include updating, removing and introducing new Proposals.

This EQIA assess the proposed changes to the Strategy, to inform the further development of Strategy Proposals ahead of City Corporation Committee approvals and public consultation later this year.

A report on the engagement, along with the suggested major amendments to the Transport Strategy Proposals were presented to Streets and Walkways Sub

Committee on Tuesday, 23 May 2023 for review. Further changes to each of the Proposals have been identified and this EQIA takes into consideration all proposed changes drafted to the end of August 2023. Each Proposal is analysed below for its impact on protected characteristic groups.

## ***Overarching Strategy Proposal***

Currently one Proposal, the Healthy Streets Approach guides the entire Strategy. The City Corporation are proposing to expand this to include two overarching Proposals that will support the Strategy.

- Proposal 1: Embed the Healthy Streets Approach in transport planning and delivery, will be renamed as Proposal 1a.
- A new Proposal 1b: Embed an inclusive approach to transport planning and delivery in all our activity and processes, will be developed.

### ***Proposal 1a: Embed the Healthy Streets Approach in transport planning and delivery.***

The Strategy will continue to place improving people's health and their experience of using streets at the heart of transport decision making. The Healthy Streets Approach<sup>11</sup> uses 31 metrics against 10 indicators to do this.

### **Positive impacts**

- ✓ The metrics and indicators include those that would benefit older and disabled people, and children such as: Clean air, Everyone feels welcome, Easy to cross, Shade and shelter, Places to stop and rest, Not too noisy, People feel safe etc.
- ✓ The Healthy Streets Approach has been updated since the initial strategy was published in 2019. It now includes the indicator "Everyone feels welcome" rather than "Pedestrians from all walks of life". It states "Streets must be welcoming places for everyone to walk, spend time and engage with other people. This is necessary to keep us all healthy through physical activity and social interaction. It is also what makes places vibrant and keeps communities strong. The best test for whether we are getting our streets right is whether the

---

<sup>11</sup> <https://www.healthystreets.com/what-is-healthy-streets>

whole community, particularly children, older people and disabled people are enjoying using this space”. This wording is more inclusive.

### **Potential negative impact**

- It was noted that accessibility is not one of the indicators of the Healthy Streets Approach, which is a shortcoming of the Approach.

### **Actions taken by City Corporation**

Accessibility is addressed in Outcome 4 in the Strategy. Furthermore, Proposal 1b will further support improving inclusivity (and accessibility) across all the Proposals.

### ***Proposal 1b: Embed an inclusive approach to transport planning and delivery in all our activity and processes***

This is a new Proposal that aims to ensure the City Corporation take an inclusive approach to the activities and processes required to deliver the Strategy. The Proposal’s ambitions will make clear the City of London Corporation’s commitment to diversity and inclusion in transport.

### **Positive impacts**

- ✓ The new Proposal 1b provides a more rigorous emphasis on ‘inclusion’, and ‘reducing inequality between groups’. This will directly address inclusion and is positive inclusion to the Strategy.
- ✓ As with the Healthy Streets Approach, all Proposals should contribute to creating inclusive streets and transport.
- ✓ Improvements to the transport system leading to improved health and well-being can be expected to impact all people living, visiting and working in the City, with resulting reductions in inequality.
- ✓ The Proposal will show a commitment to advancing equality of opportunities across protected characteristics
- ✓ The Proposal will encourage the language and engagement delivering the Strategy to be more inclusive, for example, the Strategy will talk about people using wheelchairs, as well as, walking. This will recognise that inclusiveness goes beyond physical accessibility to include needs of other protected groups and reduce inequality between groups.
- ✓ The Proposal will support addressing challenges and barriers, including the need to eliminate discrimination based on gender and disability and to foster strong community relations.

## **Potential negative impact**

- This Proposal overlaps with the “Outcome: The Square Mile is accessible to all” and it may be confusing to have two separate and similar topics separated by a wide gap in the document. All the accessibility Proposals follow on from Proposal 16, 17, 18 and 19.

## **Actions taken by City Corporation**

The Strategy will recognise that accessibility is about making sure that barriers that may prevent people from travelling easily, comfortably and confidently to and around the Square Mile are removed. While inclusion is about going a step further and ensuring that everyone feels welcome and that their opinions are heard and contribute to planning, decisions and their futures. Having a separate Outcome relating to accessibility is imperative for delivering this Strategy.

## ***Outcome: The Square Mile’s streets are great places to walk and spend time***

This Outcome contains nine Proposals:

- Proposal 2: Put the needs of people walking first when designing and managing our streets
- Proposal 3: Complete the riverside walkway and improve walking connections between the riverside and the rest of the City
- Proposal 4: Enhance the Barbican high walks
- Proposal 5: Ensure new developments contribute to improving the experience of walking and spending time on the City’s streets
- Proposal 6: Promote and celebrate walking
- Proposal 7: Provide more public space and deliver world-class public realm
- Proposal 8: Incorporate more greenery into the City’s streets and public spaces
- Proposal 9: Reduce rainwater run-off on City streets and public realm
- Proposal 10: Incorporate protection from negative weather in the design of streets and the public realm

The City Corporation will change the Outcome wording to: “The Square Mile’s streets are great places to walk, wheel and spend time”. Furthermore all Proposals relating to walking, will updated accordingly to reflect this new wording.

## **Positive impacts**

- ✓ By broadening this Outcome people wheeling or using mobility aids will be included and recognised within the Strategy with people walking. This also aligns with advice from disabled representative groups who recommend this use of language.

No negative impacts have been identified (arising from this change) at this time.

## ***Proposal 2: Put the needs of people walking first when designing and managing our streets.***

Walking and wheeling will continue to be prioritised within the Strategy to ensure people will rate the experience of walking in the Square Mile as pleasant.

There will be a number of changes to the Proposal to support improvements to:

- a. Pedestrian crossings:** Making streets easier to cross and giving people walking and wheeling greater priority.

## **Positive impacts**

- ✓ This Proposal change will be particularly beneficial for older and disabled people, and children who need a safe, comfortable and quiet walking environment.
- ✓ Improvements for pedestrians will also benefit both older and younger people who use public transport, as they are likely to walk to/from the nearest public transport stop.
- ✓ For older people measures are likely to provide an overall benefit. This is because the proportion of trips made by this age group by walking far outweighs the proportion made by bus or private car.
- ✓ All the above measures would be very beneficial to disabled and older pedestrians,
- ✓ Introducing 'green man authority' at appropriate locations – providing a default green man for people walking rather than a default green light for motor traffic. These Proposals are particularly beneficial for older and disabled people, and children.

## **Potential negative impacts**

Further measures that could be considered for all signalised crossings to improve accessibility. Reviewing all crossings to ensure provision of:

- Countdown timers
- Audible signals
- Far side signals

- Rotating cones in working order
- Suitable tactile warning surfaces.
- Ensuring no ponding at dropped kerbs and that these kerbs are not excessively steep.

- b. **Continuous footways and courtesy crossings:** Making streets easier to cross and giving people on foot greater priority at the entrances to side streets.
- Providing courtesy crossings or continuous footways across all side
  - Street entrances
  - Installing raised tables at junctions
  - Installing raised tables and pedestrian refuge islands at existing informal crossings

### **Positive impacts**

- ✓ All measures would be very beneficial to disabled and older pedestrians, people using shopping trolleys and baby buggies.

Further measures that could be considered include. Providing crossing opportunities every 100m distance as recommended in DfT Inclusive Mobility Guidance, 2021.<sup>12</sup> And ensuring dropped kerbs provided at all side road crossings.

No negative impacts have been identified (arising from this change) at this time.

**Pedestrian Comfort Levels:** The City Corporation have adopted TfL Comfort Level of B+ as a standard for City streets. Transport for London's Pedestrian Comfort Guidance recommends a minimum comfort level of B+. This provides enough space for people to feel comfortable when walking at a normal pace and for them to be able to choose where to walk.

### **Positive impacts**

- ✓ The pedestrian environment is very comfortable at PCL A+ to A- with plenty of space for people to walk at the speed and the route that they choose.

### **Potential negative impact**

- It should be noted that older and disabled people and children may not walk at what is considered a 'normal' pace which is not defined. Ideally a

---

<sup>12</sup> DfT, Inclusive Mobility: A Guide to Best Practice in Pedestrian and Transport Infrastructure  
EQIA: City of London Transport Strategy



more ambitious target could be aimed for within the A range of A+, A and A-, which would be more inclusive.

### **Actions taken by the City Corporation**

The expansion of “walking” to include people “wheeling” is more inclusive language and recognises that people have different experiences of and methods for travelling on City pavements. The initial EqIA made recommendations for pedestrian crossings to be delivered to a minimum standard, particularly as they assist with disabled people’s use of the crossing points. The proposed changes in the Proposal will suggest a minimum standard will apply to all new crossing points installed and where possible for upgrades through maintenance programme. The implementation of signals at crossing points will be in delivered in partnership with Transport for London.

The City Corporation do not propose to change the B+ standard, as in some places it is difficult to provide wider pavements due to space constraints and the historical layout of the City’s Streets. However, the will commit to widen pavements to a standard better than B+ where possible. In locations where this is not possible the will consider other space reallocation options and pedestrian priority measures.

### ***Proposal 3: Improve riverside walkway and connections to City.***

The City Corporation are not proposing any major changes to this Proposal, however, it will be updated to include further improvement ambitions. The City Corporation will work with TFL, landowners, developers and other partners to improve the connections and public realm between the riverside and the rest of the City by making it easier to cross Upper and Lower Thames Street.

### **Positive impacts**

- ✓ New pedestrian crossings at street level and widening the walkway along the riverside will benefit particularly older and mobility impaired people.
- ✓ Current access to the riverside walkway is extremely limited along Upper and Lower Thames Streets due to the lack of accessible connections between the River and the rest of the City. Any improvements would be beneficial especially for some protected groups.

### **Potential negative impacts**

- Integration of Blackfriars Pier, which is already accessible, with the rest of the City via a direct access street level pedestrian crossing would be beneficial, as it enables the further integration of accessible east-west

transport links, creating another transport option for City visitors with access needs.

- While enhancements to public realm spaces would be beneficial, these must continue to function as accessible pedestrian routes. Any ground floor leisure uses adjacent to the public realm 'open spaces' need to be carefully planned so as not to obstruct pedestrian routes.
- Restaurant tables, business signage and lighting can all have a negative effect on the accessibility of a walkway, particularly for those with mobility and sensory disabilities.

### **Actions taken by the City Corporation**

The EQIA noted that current access to the Riverside Walkway is still limited along Upper and Lower Thames Streets, due to the lack of accessible connections. The Proposal reflects this and will urge TfL to improve these crossings.

Further information on managing restaurant tables, business signage and lighting etc. are taken into consideration in Outcome: The Square Mile is accessible to all. Proposal 17: Keep pavements free of obstructions in particular will continue to ensure that pavements and streets are free of obstructions.

### ***Proposal 4: Improve Barbican high walks improving signage and the visibility of access points to make them easier to navigate.***

No major changes are being proposed to this Proposal. The City Corporation will continue to maintain existing public lifts that provide access to the high walks and other walking routes. In addition, the Proposal will explore the potential to add new public and publicly accessible lifts where required through the development process.

### **Positive impacts**

- ✓ The existing Barbican highwalks provide a welcome traffic free alternative to street level pedestrian thoroughfares, the use of which has benefits for all pedestrians, not just those with accessibility needs. However, the limitation of the highwalks is access – without easy access to lifts and clear, accessible signage information both at street level and available to potential visitors ahead of their arrival (via maps, websites etc) and well-maintained public lift access, the high walks are exclusionary. This Proposal's commitment to maintaining the existing lift access and seeking to add new lifts is therefore beneficial.

No negative impacts have been identified at this time.

***Proposal 5: Ensuring new developments enhance walking routes and provide permeability through sites.***

This Proposal will be updated, however the City Corporation are not proposing any major changes. Through the planning process the City will continue to work with developers and future occupiers to ensure all new developments provide world-class public realm and adequate space for people walking and wheeling, and contribute to improvements to surrounding streets and walking routes.

**Positive impacts**

- ✓ This Proposal is beneficial to wide range of walkers and wheelchair users, as reduce walking distances, improve sightlines and wayfinding through the City, will make the area more intuitive and easier to navigate.
- ✓ Signage should complement and assist use of new and existing walking routes.

No negative impacts have been identified at this time.

***Proposal 6: Promoting and celebrating walking.***

This Proposal will be updated to reflect new partnership working, however the City Corporation are not proposing any major changes to this Proposal.

**Positive impacts**

- Improvements to walking routes and promoting walking will be particularly beneficial for older and disabled people, and children who need a safe, comfortable and quiet walking environment.
- For older people measures are likely to provide an overall benefit. This is because the proportion of trips made by this age group by walking far outweighs the proportion made by bus or private car.
- All the above measures would be very beneficial to disabled and older pedestrians. Furthermore improving wayfinding through the City, will make the area more intuitive and easier to navigate.

**Potential negative impacts**

- Ensure organised walks and events are inclusive
- Legible London maps and signage need to take into account needs of visually impaired people with tactile signage and audio information provided. These should be at a range of height levels to allow use by wheelchair users, people of shorter stature and children.

## **Actions taken by the City Corporation**

The EQIA noted that events, walks and signage should be inclusive. Proposal 1b will support best practice and take an inclusive approach to delivering services, public spaces and transport services, and the City Corporation will continue to work with their partners to achieve this.

### ***Proposals 7-10***

Proposal 7: Provide more public space and deliver world-class public realm

Proposal 8: Incorporate more greenery into the City's streets and public spaces

Proposal 9: Reduce rainwater run off on City streets and public realm

Proposal 10: Incorporate protection from negative weather in the design of streets and the public realm

These Proposals commit to providing more public space, incorporate more greenery into the City's streets and public spaces, and incorporate protection from negative weather in the design of streets and the public realm. They will be updated with changes to address and support new policies, such as:

- The Climate Action Strategy (CAS), adopted in 2020 sets out the City's commitments to achieve net zero by 2040 in the Square Mile
- The Biodiversity Action Plan 2021-2026 and the City Greening and Biodiversity project.
- Thermal Comfort Guidelines, a technical tool launched in 2022 that enhances the understanding of the microclimatic qualities of the City of London's public spaces

## **Positive impacts**

- ✓ All these Proposals are beneficial for many protected groups. Access to public and green spaces are a health resource for disabled people for example increased wellbeing, providing opportunities for physical activity and opportunities to be socialise.
- ✓ Providing protection from negative weather will support disabled people for example at bus stops or rest points.

## **Potential negative impacts**

- Public spaces need to be carefully designed to enhance experiences of visually and hearing-impaired people, and neurodivergent and autistic people, with quiet and sheltered areas provided alongside more socially open areas.
- High buildings and streets can create microclimates such as wind tunnels which can, even in non-negative weather, cause serious challenges for those walking or cycling, particularly disabled people.
- Mitigations that can be incorporated into the built environment to reduce the impact of these 'man-made' extremes should ensure proactive street treatment, such as de-icing, extends to pavements as well as roads during periods of extreme cold, contributing towards more accessible and navigable streets for all users

### **Actions taken by the City Corporation**

Proposal 1b will support best practice and ensure an inclusive approach is embedded in all our Proposals and our transport planning and the design and delivery of projects to mitigate some of these impacts.

This will include:

- Using the principles of inclusive design and delivery to inform strategic decision-making and project prioritisation
- Developing robust, comprehensive and co-created Equality Impact Assessments (as per our Public Equality Duty in the Equalities Act 2010) for all projects and major policy decisions, publishing those Assessments in accessible formats, communicating the publication of these Assessments to a wider list of stakeholders and interested groups, and ensuring that the findings and recommended mitigations of all Assessments are materially incorporated into our policies and processes
- Using the City of London Street Accessibility Tool (CoLSAT; Proposal 16) to further improve the inclusivity and equity of our projects, particularly using the tool to improve design outcomes for people with disabilities
- Finally Proposal 1b will support best practice and take an inclusive approach to delivering services, public spaces and transport services, and the City Corporation will continue to work with their partners to achieve this.

### ***Outcome: Street space is used more efficiently and effectively***

This Outcome contains five Proposals. The City Corporation are proposing to make some major changes to this Outcome, notably to Proposal 11 and 15.

- Proposal 11: Take a proactive approach to reducing motor traffic

- Proposal 12: Design and manage the street network in accordance with the City of London Street Hierarchy
- Proposal 13: Use timed and temporary street closures to help make streets safer and more attractive places to walk, cycle and spend time
- Proposal 14: Make the best and most efficient use of the kerbside and car parks
- Proposal 15: Support and champion the 'Turning the Corner' campaign

***Proposal 11: Take a proactive approach to reducing motor traffic***

The City Corporation is proposing to make several changes to this Proposal:

- Remove the commitment to developing a charging mechanism for the City of London, which is considered unworkable in the absence of TfL and Mayor of London support for a wider London scheme.
- Commit to working with TfL on the development of future road user charging that achieves traffic reduction, particularly at peak times.
- Review our trajectory and progress against the traffic reduction target of 25% by 2030 and 50% by 2044 (against 2017 baseline) and update targets if required.
- Review the need for actions to ensure an adequate level of taxi provision in the context of lower numbers post-pandemic.
- Recognise the need to continue to monitor PHV numbers should they increase again.

**Positive impacts**

- ✓ Reduced motor traffic flows which is beneficial to many protected groups by providing a safer, quieter and less polluted environment.
- ✓ Reducing motor traffic overall by 25% by 2030 would have positive effects on overall congestion levels and air quality levels. It will create the additional capacity needed within the City's Street network to enable delivery of improved pedestrian experiences
- ✓ It is noted vehicles used by disabled people are recognised in the list of 'Essential traffic'.
- ✓ The majority of journeys in the City of London involve walking, either because they are completely walked or through a walking leg to access a public transport stop. Improving walking routes will significantly benefit those travelling with baby buggies, who may find it difficult to negotiate crowded and narrow footways. It will also benefit those walking with small children, enabling them to walk side-by-side more easily.
- ✓ It is noted that while some vehicle journeys may become more indirect due to restrictions on through traffic, necessary access will be retained to the affected streets.

- ✓ Reducing traffic sets out principles to reduce road danger, These measures will beneficially impact older, disabled people, young people and BAME groups who are more likely to be victims in traffic collisions.

### **Potential negative impacts**

- The Proposal changes may negatively affect people who are disabled or elderly, those who are pregnant, and parents with infants and/or young children who may find it more difficult to walk and may therefore prefer the use of door-to-door transport services.
  - For many people with accessibility requirements, vehicle access remains a necessary essential in order to maintain even a low level of personal mobility and independence. The City Corporation will need to consider how to continue to provide vehicular access for residents, people of all abilities and people with access requirements, such as heavy luggage or injuries and illness.
  - Ensuring that taxi and private hire drivers are aware that they can access closed streets for the purposes of dropping-off and picking up mobility impaired passengers, including older passengers with mobility impairments.
  - Some disabled people will require their own specialised, adapted modified transport rather than shared vehicles such as private taxis.
- Road user charge should have exemptions for those with special access needs requiring vehicles.

### **Actions taken by the City Corporation**

The City Corporation will add some context within the Proposal to recognise that reducing motor traffic may negatively affect a proportion of people who are disabled, elderly, pregnant, parents with infants and/or young children or those who may find it more difficult to walk and therefore prefer the use of door-to-door transport services. It will acknowledge that for many people with accessibility requirements, vehicle access remains a necessary essential in order to maintain even a low level of personal mobility and independence. Thus it commit to ensure engagement and EQIAs are undertaken when considering road closures and traffic restrictions to explore how to continue to provide vehicular access for residents, businesses and people of all abilities and people with access requirements in more detail. Furthermore though proposal 1b the City Corporation will support best practice and take an inclusive approach to delivering services, public spaces and transport services, and the City Corporation will continue to work with their partners to achieve this.

### ***Proposal 12: Design and manage the street network in accordance with the City of London Street Hierarchy***

No major changes are being proposed to this Proposal at this time and it will continue to support designing and managing the street network in accordance with the hierarchy to encourage drivers to use the right street for the right journey.

#### **Positive impacts**

- ✓ A hierarchy of streets and use of timed streets closure, restricts main traffic flow to a few key routes, allowing inner and majority of streets to have reduced motor traffic flows which is beneficial to many protected groups by providing a safer, quieter and less polluted environment.

No negative impacts have been identified at this time.

### ***Proposal 13: Use timed and temporary street closures to help make streets safer and more attractive places to walk, cycle and spend time***

The City Corporation are not proposing any major changes to this Proposal, however, they are removing the completed commitments on temporary street closures and simplifying the description of approach. They will continue to support opening their streets to people walking, wheeling and cycling and will support Destination City and the work of the Business Improvement Districts (BIDs).

#### **Positive impacts**

- ✓ Reducing motor traffic to certain streets at certain times, will generally have positive effects on safety and air quality levels.
- ✓ As the majority of journeys in the City of London involve walking, either because they are completely walked or through a walking leg to access a public transport stop, streets temporarily closed to motor traffic flows will be beneficial to many protected groups by providing a safer, quieter and less polluted environment.
- ✓ It will create the additional capacity needed within the City's Street network to enable delivery of improved pedestrian experiences.

#### **Potential negative impacts**

- The Proposals may negatively affect a small proportion of those who are pregnant and parents with infants and/or young children who prefer the use of door-to-door transport services.



- For many people with accessibility requirements, vehicle access remains a necessary essential in order to maintain even a low level of personal mobility and independence.
- It is noted that while some vehicle journeys may become more indirect due to restrictions on through traffic, necessary access should be retained to the affected streets.
- Some disabled people will require their own specialised, adapted modified transport rather than shared vehicles such as private taxis.

### **Actions taken by the City Corporation**

The City Corporation will add context within the Proposal to recognise that timed and temporary street closures may negatively affect a proportion of people who are disabled, elderly, pregnant, parents with infants and/or young children, or those who may find it more difficult to walk and therefore prefer the use of door-to-door transport services. Proposal 1b will support best practice and take an inclusive approach to delivering services, public spaces and transport services. Furthermore the extent of timed restrictions and types of vehicles excluded will be decided on a case-by-case basis, applying the approaches outlined in Proposal 1b and Proposal 12, and subject to modelling, impact assessments and consultation prior to implementation.

### ***Proposal 14: Make the best and most efficient use of the kerbside and car parks***

Making best use of kerbside space will ensure adequate on-street provision of short stay commercial parking, disabled bays, taxi ranks, loading bays and coach bays. The Proposal will stay largely similar, however, it will be updated to include reference to delivery through Healthy Streets Plans for some changes, as decisions on changes to loading or parking areas will need to be considered with reference to the impact and benefit for neighbouring streets. Furthermore it will be updated to included specific reference to off-street disabled space and provision of adequate off-street space, within context of identifying spare capacity for alternative uses. This was a negative impact identified in the initial EQIA that has now been addressed.

No further negative impacts have been identified (arising from this change) at this time.

Further recommendations are for the Proposal to consider provisions for pedestrians along the kerbside, providing seating and shelter every 50m distance as recommended in DfT Inclusive Mobility Guide<sup>13</sup>.

### ***Proposal 15: Support and champion the Turning the Corner campaign***

The City Corporation is proposing to remove this Proposal from the Strategy and include behaviour change and education under the Safer Behaviours element of “*Proposal 20 – Apply the safe system approach and the principles of road danger reduction to deliver Vision Zero*”.

The City Corporation believe that progress has been made towards the achievement of the objectives of the ‘Turning the Corner’ campaign. The principles were incorporated into the revised Highway Code January 2022, with motor vehicles now required to give way to people walking and cycling when turning left into a side road. Furthermore, with the publication of the Highway Code, the British Cycling Turning the Corner campaign has now ceased, and the emphasis is on further communication and behavioural campaigns to raise awareness and embed the change in motorists’ behaviour.

No negative impacts to people with protected characteristics are anticipated as a result of deleting this Proposal and combining behaviour change and education with Proposal 20.

### ***Outcome: The Square Mile is accessible to all***

This Outcome contains four Proposals and the City Corporation are proposing to make major changes to this Outcome, notably to Proposal 16.

- Proposal 16: Develop and apply the City of London Street Accessibility Standard
- Proposal 17: Keep pavements free of obstructions
- Proposal 18: Keep pedestrian crossings clear of vehicles
- Proposal 19: Support and champion accessibility improvements to Underground stations

---

<sup>13</sup> DfT, Inclusive Mobility: A Guide to Best Practice in Pedestrian and Transport Infrastructure

## ***Proposal 16: Develop and apply the City of London Street Accessibility Standard***

The City Corporation propose to change the title to “*Proposal 16: Make our streets accessible through ongoing improvements and by applying the City of London Street Accessibility Tool (CoLSAT)*”.

This change will reflect the progress made in this Proposal and the development of CoLSAT, which was created based on interviews with 34 disabled people in 12 different needs, and is currently in use by City Corporation officers.

The City Corporations proposes to:

- Commitment to apply CoLSAT on all projects and encourage developers to use it as part of their assessment processes.
- To continue to develop and improve the CoLSAT as appropriate, to ensure that it remains current to changes in legislation and continues to drive improvements in quality and performance.
- To establish and commit to an annual programme of improvements with a sustainable level of funding directed at improving accessibility on streets that are not otherwise covered by specific projects.
- To ensure that maintenance of the City’s streets addresses any issues that could impact disabled people. Ensure that our maintenance programme is sufficiently robust to provide good quality surfaces for our streets and pavements and public spaces.

Replacement of CoLSAS with CoLSAT, an accessibility tool that has already been developed is a positive change. The tool sets minimum and desired standards for the design of streets to ensure they provide an environment where all current and potential users feel welcome and safe and can travel comfortably and confidently.

### **Positive impacts**

- ✓ All these changes are positive as the CoLSAT has already been developed and tested.
- ✓ Improvements to streets using COLSAT would be beneficial to a wide range of protected groups.
- ✓ Applying CoLSAT on all projects to identify opportunities to improve accessibility will be beneficial disabled people, people who are pregnant or people with buggies and small children.
- ✓ Continuing to engage disabled users of our streets and groups representing the needs of different street users to expand and improve CoLSAT, ensuring the tool and the data within it remains robust and adaptable to change.

- ✓ Delivering accessibility improvements at locations could contribute to pavements and crossings being level and wide enough to avoid uncomfortable crowding.
- ✓ Streets will be cleaner, quieter and less stressful places that offer more opportunities to stop and rest.
- ✓ Of all the Proposals, this one directly addresses the needs of many protected groups including older people, disabled people, women, especially pregnant women and those with baby buggies, shopping trolleys, and young children.

No negative impacts to people with protected characteristics are anticipated at this time.

***Proposal 17: Keep pavements free of obstructions.***

The City Corporation will continue to ensure that pavements and streets are free of obstructions. No major changes are being proposed to this Proposal, however, it will be updated with some new commitments to reference street design, the use of COLSAT and dockless bikes and scooter use.

**Positive impacts**

- ✓ This is key to accessibility and sets out clear policies and regulations to keep footways clear of A-boards, seating, people congregating outside bars, abandoned dockless bikes, unnecessary street furniture, temporary signage, electric vehicle charging points.

No negative impacts to people with protected characteristics are anticipated at this time.

***Proposal 18: Keep pedestrian and cycle crossings clear of vehicles***

The City Corporation is proposing to remove this Proposal from the Strategy.

No negative impacts to people with protected characteristics are anticipated as a result of deleting this Proposal.

***Proposal 19: Support and champion accessibility improvements to Underground stations.***

No major changes are being proposed to this Proposal at this time. The City Corporation is still committed to the support and champion accessibility improvements to Underground stations and we will work with TfL to prioritise this.

## **Positive impacts**

- ✓ This will be highly beneficial to disabled people's groups, people who are pregnant, parents with infants in buggies and/or young children, people who have limited mobility and/or those who are travelling with luggage.

## **Potential negative impacts**

- The PTAL rating does not factor into its calculations whether a train or underground station is accessible, nor does it factor in the crowding (including ability to board services) or ease of interchange, both factors which are of major significance to people with limited mobility needing to rely on public transport for their journey.

## **Actions taken by the City Corporation**

The Proposal has been updated to recognise that physical barriers, such as step free access is only one of the many elements that need to be addressed when exploring the accessibility barriers that exist for people with disabilities.

## ***Outcome: People using our streets and public spaces are safe and feel safe***

This Outcome contains four Proposals. The City Corporation are proposing to make some major changes to this Outcome, notably to Proposal 20.

- Proposal 20: Apply the safe system approach and the principles of road danger reduction to deliver Vision Zero
- Proposal 21: Work with the City of London Police to reduce crime and fear of crime
- Proposal 22: Ensure on-street security measures are proportionate and enhance the experience of spending time on our streets
- Proposal 23: Improve the quality and functionality of street lighting

## ***Proposal 20: Apply the safe system approach and the principles of road danger reduction to deliver Vision Zero.***

The City Corporation remains committed to doing everything it can to make the streets of the Square Mile safe for everyone. They will continue working with key partners such as the City of London Police and TFL to keep people safe from harm. The City Corporation proposes multiple changes to this Proposal, which sets out principles to reduce road danger. These include:

- To Include reference to publication of a Vision Zero action plan for the City of London. This will supersede the expiry of the Road Danger Reduction Plan 2018-23 and propose an amendment to frequency of publication, 4 years after the transport strategy, with the new plan covering the period 2023-2028.
- Change to trajectory for achievement of zero people Killed or Seriously Injured (KSI) in 2040, with new targets for fewer deaths and serious injuries.
- Updating the priority locations for intervention based on revised collision and casualty data analysis. In addition to referencing the revised collision and casualty data analysis to highlight priorities and areas of focus, including TfL roads, motorcycles, buses and heavy good vehicles.
- Replacing the commitment to seek mandatory 15mph, as this has been rejected by Department for Transport and instead pursue the trial of advisory speed limits below 20mph based on the appropriate conditions of a street, on a case by case basis.

### **Positive impacts**

- ✓ The Reasons for updating of Proposal 20 and removing ambition for 15mph, targets for 2018-2023, and priority locations, is clear and reasonable.
- ✓ These measures will beneficially impact older, disabled people, young people and BAME groups who are more likely to be victims or more severely injured in traffic collisions.

### **Potential negative impacts**

All the following deletions within the strategy will have a negative impact on road safety, particularly impacting vulnerable road users.

- It is not clear why use of ISA as a requirement for any service procured by the City is no longer in the Strategy. Removal of commitment towards working for ISA requirements with TfL in taxis and private hire vehicles and with insurance companies for private vehicles is not clear.
- Removal of encouraging TfL to include safety-based performance measures instead of Timetable performance measures in bus contracts.
- Further attention needs to be paid to poor behaviour by delivery cyclists, especially those on electric bikes who are under time pressure to deliver and pose a danger to themselves and others, in particular to vulnerable pedestrians.

### **Actions taken by the City Corporation**

The Proposal will look to review potential risks associated with new technologies such as quieter electric vehicles and how they will be identified and mitigated. It will also encourage better training for drivers and cyclists, including freight and bus drivers, joint working with the City Police on education and enforcement and include post collision learning, analysis and support. Targeting poor behaviour by cyclists, e-scooter riders etc. will also be addressed is addressed in the current Outcome: More people choose to cycle in the City, which will be updated to include Micromobility.

The removal of the reference to ensuring Intelligent Speed Assistance (ISA) is a requirement for City Corporation services, as well as for other taxi and private hire, other fleets and private cars. It is believed that requiring ISA would significantly limit the availability of providers for City Corporation contracts. It is also believed that TfL is not able to mandate the introduction of ISA in taxi and private hire vehicles, or within broader fleets due to the current lack of availability of this technology in commercial vehicles.

Removal of the action to encourage TfL to adopt bus safety-based performance measures. TfL has adopted a Safety Performance Index (SPI) that provides a way to benchmark performance across bus operators and to address issues relating to safety where it arises with an operator.

### ***Proposals 21 & 22***

Have been grouped together as they aim to reduce crime and provided suitable on-street security measures. The City Corporation are not proposing any major changes to these Proposals, however, they will be expanded to include supporting campaigns that reduce the fear of crime and include reference to the Safer City Partnership.

### **Potential negative impacts**

- The measures proposed are targeted at vehicle and cycle theft. However, these need also to focus on assaults that disproportionately affect protected characteristic groups who are more likely to be victims of crime.

### **Actions taken by the City Corporation**

EQIA recommended that the Proposal should add some information on assaults and violence that disproportionately affects some protected characteristic groups, who are more likely to be victims of crime. The Proposal has been updated to include the work undertaken with the Safer City Partnership, and references work they are doing on neighbourhood policing and anti-social behaviour.

### ***Proposal 23: Improve the quality and functionality of street lighting***

Although the City Corporation are not proposing any major changes to this Proposal, we recommend that they take the following points into consideration.

#### **Potential negative impacts**

- The current Proposal seeks to provide better lighting at junctions to reduce collisions. It should also explicitly seek to improve lighting in areas where some groups feel vulnerable such as quiet streets, corners and cul-de-sacs where women, disabled people, older and BAME people could feel at risk.
- Lighting should also be used to provide safe places to walk highlighting any footway hazards.

### ***Outcome: More people choose to cycle in the City***

The City Corporation are proposing to expand this Outcome to include scooters and other forms of micromobility. With all individual Proposals being updated accordingly to reflect this new inclusion. It currently includes five Proposals that will have major changes.

- Proposal 24: Apply a minimum cycling level of service to all streets
- Proposal 25: Increase the amount of cycle parking in the City
- Proposal 26: Ensure new developments contribute to improving the experience of cycling in the City
- Proposal 27: Promote and celebrate cycling
- Proposal 28: Improve cycle hire in the City

### ***Proposal 24: Apply a minimum cycling level of service to all streets***

This Proposal will be renamed to *“Proposal 24: Improve the experience of riding cycles and scooters and prepare for future forms of micromobility”*

The City Corporation want to take a more inclusive approach in their definition of who they are designing cycling and micromobility interventions for (all ages, genders, etc). The Proposal will also take into consideration the changes to the new London Cycle Design Standards and update the comments to deliver cycle networks. Micromobility will need to be defined in the Strategy and is being proposed as: *“small vehicles which can be ridden safely in cycle lanes such as bikes, e-bikes and e-scooters”*, and which are legally permitted to be using City streets.

#### **Positive impacts**



- ✓ The City Corporation wanting to take a more inclusive approach in their definition of who they are designing cycling and micromobility interventions could have a positive impact for some disabled people who are able to use adapted cycles or micromobility.
- ✓ Improved facilities for cycling and encouraging cycling has a number of health and wellbeing benefits.
- ✓ The Proposal considers non-standard adapted cycles for disabled people.
- ✓ Rental e-scooters could encourage people to switch from car use to a rental e-scooter instead for their trip. Furthermore, they can be integrated with other modes of transport, such as public transport and rail so have the potential to discourage car usage and encourage sustainable transport journeys. As people of young and old age, and some disabilities are more vulnerable to poor air quality the benefits of improved air quality could be far greater on these protected groups.<sup>14</sup>

### **Potential negative impacts**

- Speeding and irresponsible riding behaviours.
- Irresponsible parking leading to e-scooters and dockless cycles being abandoned and becoming street litter that could cause obstructions or injury.
- Risk of injury for those riding e-scooters.
- Noting the potentially dangerous impact of high speed and powerful electric cycles on the street environment, new forms of micromobility should be restricted to electrically assisted cycles with a maximum speed stated.

### **Actions taken by the City Corporation**

The City Corporation developed an EQIA in 2021<sup>15</sup>, which supports and builds on Transport for London's electric scooter or e-scooter rental trial EQIA in London assessment. It examines how different groups of people with protected characteristics would or could be, disadvantaged or advantaged by the introduction of the e-scooter trial in the City of London.

---

<sup>14</sup> Greater London Authority (2012). Air Quality in City of London: A Guide for Public Health professionals. [https://www.london.gov.uk/sites/default/files/air\\_quality\\_for\\_public\\_health\\_professionals\\_-\\_city\\_of\\_london.pdf](https://www.london.gov.uk/sites/default/files/air_quality_for_public_health_professionals_-_city_of_london.pdf) and World Health Organisation WHO (2018) Polluted Air Affects More than 90% of Children <https://unfccc.int/news/polluted-air-affects-more-than-90-of-children>

<sup>15</sup> <https://tfl.gov.uk/corporate/publications-and-reports/equality-and-inclusion-publications> And <https://www.cityoflondon.gov.uk/assets/Services-Environment/city-of-london-corporation-pan-london-escooter-trial-eqia.pdf>

The City Corporation recognises that adjustments need to be made to mitigate some of the issues identified with the introduction of e-scooter and coordinated monitoring, data collection and evaluation programme will allow TfL and the City Corporation to build a detailed understanding of the wider negative and positive impacts of the trial.

Mitigations that are still in place include ensuring that e-scooter and dockless cycle parking locations selected will minimise impacts. There are areas where e-scooter riders must travel slower or be restricted from entering entirely. Working with the City of London Police and e-scooter operators work to improve enforcement to further mitigate potential negative impacts. Furthermore the Proposal will be updated to include reference to the speeds of rental e-bikes and e-scooters and wherever possible to limit them to no greater than 15mph through the use of GPS-enabled speed limiters and geofencing systems.

### ***Proposal 25: Increase the amount of cycle parking in the City***

This Proposal will be renamed to “*Proposal 25 ; Increase the amount, variety and quality of cycle and scooter parking and facilities in the City*” and the following changes will be made to this Proposal:

- Incorporate existing “Proposal 26: Ensure new developments contribute to improving the experience of cycling in the City” into revised Proposal 25.
- The Parking Delivery Plan will be expanded to incorporate dockless space and adapted/cargo cycle/scooter space and rental e-scooters.
- Include a commitment to undertake a review and report on the demand for micromobility parking and identify pavement and carriageway space available to accommodate micromobility parking that doesn’t negatively impact other street uses and users; include City Stations.
- Include actions to identify micromobility parking best practice and design to mitigate against cycle and scooter theft and vandalism.
- Review innovative parking solutions and designs that increase the space efficiency, security and safety.
- Support the ongoing development and review of TfL’s Dockless Bike Share Code of Practice for Operators in London.
- Ensure dockless hire scheme operators use zero emission capable or preferably non-motorised vehicles as part of their operations.
- Dockless cycle operators actively restrict their users from parking outside designated areas and quickly remove cycles that are not parked in these.

### **Positive Impacts**

- ✓ Improved safety guidance and increased variety and quality of facilities for cycling, scooters, cargo bikes and encouraging cycling has a number of health and wellbeing benefits. Furthermore more sustainable transport journeys in

smaller vehicles could reduce Road Danger, and the benefits of improved air quality could benefit everyone.

- ✓ More enforcement on Scooters and dockless hire operators who are active in the City will need to ensure that hire vehicles and schemes are fully compliant with all local and national standards and legislation, especially concerning the construction and safety standards of vehicles.
- ✓ Better dockless cycle hire and e-scooter and associated infrastructure could reduce the obstruction on pavements or pedestrian crossings or posing less of a danger to street users.

### **Potential negative impacts**

- Irresponsible parking behaviours leading to e-scooters and dockless cycles being abandoned and becoming street litter that could cause obstructions or injury.

### ***Proposal 26: Ensure new developments contribute to improving the experience of cycling in the City***

Although this Proposal will be deleted its principles will be merged into revised Proposal 25.

*“New Proposal 26: Support and celebrate micromobility in the City”* will be developed.

It will include micromobility, and continue to promote and celebrate walking and cycling through partner activities such as conferences and festivals. Furthermore it will merged Old Proposal 27 within new Proposal 26 to include micromobility. The Proposal will improve accessibility and inclusion for many protected groups as the Proposal will continue to support:

- cycle logistics and the use of cycles as mobility aids by ensuring that all parts of this network are designed to be accessible to non-standard cycles, such as cargo cycles or adapted cycles.
- Encourage the provision of parking facilities that are suitable for nonstandard cycles, including providing off-street storage for cargo bikes and hand carts in developments that include ground floor retail and takeaway food outlets.

### **Positive impacts**

- ✓ This is very positive and beneficially impacts many protected groups.
- ✓ It should also include hire of non-standard adapted cycles for disabled people.

No negative impacts to people with protected characteristics are anticipated at this time.

***Proposal 27: Promote and celebrate cycling***

This Proposal will be deleted and the Proposal text merged into New Proposal 26.

We do not anticipate any negative impacts to people with protected characteristics by deleting this Proposal and merging the text into Proposal 25.

***Proposal 28: Improve cycle hire in the City***

This Proposal will be deleted. The Strategy will merge the existing Proposal 28 text into Proposal 25, please see revised Proposal 25.

We do not anticipate any negative impacts to people with protected characteristics by deleting this Proposal and merging the text into Proposal 25.

***Outcome: The Square Mile's air and streets are cleaner and quieter***

This Outcome contains nine Proposals and the City Corporation are proposing to make some changes to this Outcome, notably to Proposal 29.

- Proposal 29: Support and champion a central London Zero Emission Zone
- Proposal 30: Install additional electric vehicle charging infrastructure
- Proposal 31: Request an accelerated roll out of zero emission capable buses
- Proposal 32: Support small businesses to accelerate the transition to zero emission capable vehicles
- Proposal 33: Make the City of London's own vehicle fleet zero emissions
- Proposal 34: Reduce the level of noise from motor vehicles
- Proposal 35: Reduce noise from streetworks
- Proposal 36: Encourage innovation in air quality improvements and noise reduction
- Proposal 37: Ensure street cleansing regimes support the provision of a world-class public realm

***Proposal 29: Support and champion a central London Zero Emission Zone and low emission vehicles***

The City Corporation will continue to support improved air quality and has proposed to make a number of changes to this Proposal to do this.

Firstly they intend to remove the commitment to local Zero Emissions Zones (ZEE) in the City of London and to continue to support wider emission controls for central London in line with the Mayor's Transport Strategy. They will support use of next generation road user charging to control traffic more sensitively than congestion charge and ULEZ (within Proposal 11 'Take a proactive approach to reducing motor traffic'). Furthermore they will target traffic reduction for high polluters where appropriate - if mechanism can be identified. Finally the Proposal has removed reference to supporting a ZEE covering central London within the next Mayoral term, given the indication by City Hall and TfL that the Mayor no longer intends to implement one.

### **Positive impacts**

- ✓ This is very positive and beneficially impacts many protected groups who are most vulnerable to illness from traffic pollution.
- ✓ People of young and old age are more vulnerable to poor air quality. For young children negative air quality can lead to reduced lung development and for the elderly 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 disproportionately through improved air quality.

### **Potential negative impacts**

- While the range of electric vehicles is continuing to increase within the car market as a whole, there are limited electric or e-hybrid vehicles available to drivers seeking a Wheelchair Accessible Vehicle (WAV) via the Motability Scheme<sup>13</sup>. Disabled drivers therefore face additional challenges when seeking to access the cleaner vehicle technologies over and above the existing challenges faced by any vehicle owner who would be needing to maintain vehicle ownership and/or access within the ZEE zones.
- Further mitigations and transition periods that allow for this delayed access to new technologies should be proactively considered and future proofed into any Proposals for further consultation with respect to the ZEEs.

### **Actions taken by the City Corporation**

Plans for a Central London ZEE by 2025 have at present been dropped by the Mayor of London, although TfL remains supportive of localised ZEE schemes in London boroughs. City Corporation have removed the commitment to local Zero Emissions Zone (ZEE) covering the City of London. Furthermore, through Proposal 1b the City Corporation will work with their partners and challenge proposed policies that do not support its corporate EDI objectives, or the Equality Act, for example, this could be done through the formal consultation process.

### ***Proposal 30 Install additional electric vehicle charging infrastructure:***

Although the City Corporation are not proposing any major changes to this Proposal, it will be updated to include a date for the next review of demand for EV charging infrastructure.

#### **Positive impacts**

- ✓ Improved air quality impacts many protected groups, especially those who are most vulnerable to illness from traffic pollution.

#### **Potential negative impacts**

- ✓ The City Corporation should consider the infrastructure charging needs of Blue Badge and Red Badge holders. Accessible charging infrastructure meeting current advisory standards should be provided.

#### **Actions taken by the City Corporation**

Best Practice for accessible charging infrastructure will be implemented as standard

### ***Proposal 31: Request an accelerated roll out of zero emission capable buses***

No major changes are being proposed to this Proposal other than updated targets. Improved air quality impacts many protected groups, especially those who are most vulnerable to illness from traffic pollution.

No negative impacts arising from this change have been identified at this time.

### ***Proposal 32: Support small businesses to accelerate the transition to zero emission capable vehicles***

Since the adoption of the Climate Action Strategy there is a newly funded support through Heart of the City to support SMEs. Improved air quality impacts many protected groups, especially those who are most vulnerable to illness from traffic pollution.

No negative impacts arising from this change have been identified at this time.

### ***Proposal 33: Make the City of London's own vehicle fleet zero emissions***

No major changes are being proposed to this Proposal other than removing reference to ZEZ and encouraging more sustainable deliveries via cargo bikes or

EQIA: City of London Transport Strategy

smaller zero emission vehicles. Improved air quality impacts many protected groups, especially those who are most vulnerable to illness from traffic pollution.

No negative impacts to people with protected characteristics are anticipated at this time.

### ***Proposals 34, 35, 36***

- Proposal 34: Reduce the level of noise from motor vehicles
- Proposal 35: Reduce noise from streetworks
- Proposal 36: Encourage innovation in air quality improvements and noise reduction

These Proposals are grouped together as all aim to reduce unnecessary urban noise, creating a more comfortable and less intrusive audible environment creates a better environment for those who can use audible cues to orientate themselves within the urban environment and detect hazards.

### **Positive impacts**

- ✓ This is very positive and beneficially impacts many protected groups.
- ✓ Elsewhere it is stated that any potential risks associated with new technologies such as quieter electric vehicles will be identified and mitigated.

No negative impacts to people with protected characteristics are anticipated at this time.

### ***Proposal 37: Ensure Street cleansing regimes support the provision of a world-class public realm***

No changes are being proposed to this Proposal and no negative impacts arising from this change have been identified at this time.

### **Positive impacts**

- ✓ This is very positive and beneficially impacts many protected groups.
- ✓ Street cleansing should also include monitoring of surfaces, to identify and deal with uneven paving and cracks that disproportionately affect disabled people especially visually impaired and mobility impaired people.
- ✓ Wet pavements can be slippery. A specific action point to remove ponding along dropped kerbs would be particularly beneficial.

## ***Outcome: Delivery and servicing needs are met more efficiently, and impacts are minimised***

This Outcome contains two Proposals and the City Corporation are proposing make some changes, notably to Proposal 38.

- Proposal 38: Reduce the number of freight vehicles in the Square Mile
- Proposal 39: Develop a sustainable servicing programme

### ***Proposal 38: Reduce the number of freight and service vehicles in the Square Mile***

The City Corporation will continue to support improved air quality and reduce the number of freight vehicles in the Square Mile. Reducing the number of freight vehicles in the City remains a key commitment and is central to the achievement of other Outcomes and Proposals, including Vision Zero, clean and quiet streets and efficient use of street space.

The Proposal will be updated to remove the commitment to providing sustainable logistics consolidation centre, included new approaches such as allocating space on street for mobile distribution hubs, update commitments on target dates for volume of freight vehicles, included reference to promoting the role of rail to facilitate incoming freight to the City in light of Network Rail's Rail Freight Strategy and update the section on construction logistics plan, to ensure current best practice followed for advice/planning requirements on alternative travel and transport to development at sites in the City.

### **Positive impacts**

- ✓ Using measures such as retiming deliveries, freight consolidation measures, last mile logistics hubs will reduce the impact of large delivery vehicles on vulnerable groups walking, cycling, being driven, or driving within the City.

No negative impacts to people with protected characteristics are anticipated at this time.

### ***Proposal 39: Develop a sustainable servicing programme***

The Proposal has been updated to remove the commitment to develop a Servicing Action plan, in favour of sharing current best practice and working with TfL to develop future guidance, and add a reference to working with BIDs to promote best practice.



## **Positive impacts**

- ✓ Using measures such as retiming deliveries, freight consolidation measures, last mile logistics hubs will reduce the impact of large delivery vehicles on vulnerable groups walking, cycling, being driven, or driving within the City.

No negative impacts to people with protected characteristics are anticipated at this time.

## ***Outcome: Our street network is resilient to changing circumstances***

This Outcome contains three Proposals and the City Corporation are proposing make some changes, notably to Proposal 42 and 43.

- Proposal 40: Allow some Local Access streets to function as City Access streets during significant disruption
- Proposal 41: Reduce the impact of construction and streetworks
- Proposal 42: Make the street network resilient to severe weather events

### ***Proposal 40: Allow some Local Access streets to function as City Access streets during significant disruption***

No changes are being proposed to this Proposal and no negative impacts arising from this change have been identified at this time.

## **Positive impacts**

- ✓ Appropriate management arrangements will ensure streets remain safe for all users, such as a clear demarcation of pedestrian space, lower speed limits and marshalling.

No negative impacts to people with protected characteristics are anticipated at this time.

### ***Proposal 41: Reduce the impact of construction and streetworks***

The City Corporation will continue to reduce the impact of construction and Street works on people using their Streets. Although no major changes are being proposed to this Proposal, we recommend that they take the following points into consideration.

## **Positive impacts**

- ✓ It is noted the needs of people walking will be prioritised during streetworks and construction, with the aim of maintaining a comfortable and accessible walking route on both sides of the street, with space reallocated from general traffic as necessary. Accessible diversions must be provided if space constraints do not allow an acceptable level of temporary provision of a safe in-road direct option is not possible.

## **Potential negative impacts**

However, it is noted that the following is not included:

- Existing 'best practice' principles developed through the City's Considerate Contractor Scheme over the last decade or more have not been incorporated and referenced in this Strategy. Through that initiative, the quality of site hoarding has improved significantly with emphasis being placed on maintaining a street environment that is as accessible as possible. Features of sites that follow the principles include:
  - boxed-in scaffolds (protecting from trips etc),
  - use of high contrast (yellow) markings to highlight unavoidable hazards (e.g. level changes, poles and posts),
  - high and low level viewing points through the hoardings where a 'inside the site' view is provided,
  - avoidance of harsh and distracting colours and patterns on hoardings.

### ***Proposal 42: Make the street network resilient to severe weather events.***

This Proposal will be revised to include commitments from CAS published in 2020, which embeds climate resilience into streets and the public realm, with key measures to include, Sustainable Drainage Systems (SuDS), tree planting and greening and permeable/flood resistant road surfaces wherever possible. Furthermore it will be updated and removed formal engagement with the London Climate Change Partnership Transport Adaptation Sector Group (TASG).

## **Positive impacts**

- ✓ Protected groups such as disabled, mobility impaired people, women and small children are particularly affected by negative weather conditions so this will be a positive improvement.

Suggest further initiatives to address the needs of protected groups such as:

- Discussion with Transport for London to ensure bus stops are covered to provide shelter
- Sheltered seating areas along pedestrian routes (that also accommodate wheelchair users)
- Canopies along shop-fronts and covered walkways encouraged through the planning process
- Quickly addressing ponding at dropped kerbs at crossings, and generally along pedestrian routes;
- Proposed changes to the time-table are clear and reasonable.

No negative impacts have been identified (arising from this change) at this time.

### **Actions taken by the City Corporation**

Proposal 1b will be used to guide an inclusive approach to delivering climate resilience into streets and the public realm spaces and transport services.

### ***Outcome: Emerging transport technologies benefit the Square Mile***

This Outcome contains three Proposals and the City Corporation are proposing make some changes, notably to Proposal 43, Proposal 44.

- Proposal 43: Establish a Future Transport Programme will be removed
- Proposal 44: Establish a Future Transport Advisory Board
- Proposal 45: Explore the need for legislative change to ensure emerging technology and innovation benefits the Square Mile

### ***Proposal 43: Establish a Future Transport Programme***

The City Corporation propose to make several changes to this Proposal. They will remove the commitment to a future action plan and reduce the commitment to drive forward future technology, we will continue to support and take up opportunities. The new emphasis will be to engage with relevant partners to support, enable, facilitate and deliver transport innovation and technology with projects focused on the same principles as previously:

- Enabling disabled passengers to hire and travel by taxis and private hire vehicles
- Ensuring kerbside space is used as efficiently
- Enhancing our data collection and processing capabilities,
- Exploring the use of GPS-enabled technologies and geofencing to aid the regulation

No negative impacts have been identified at this time, however, future transport innovations should be considered appropriate for trial and use in the City context if they support the delivery of Healthy Streets, Proposal 1b and adhere to other national standards.

***Proposal 44: Establish a Future Transport Advisory Board***

The definition and management of a Board is no longer considered to be the best approach to supporting delivery of Proposal 43. Future transport work and decisions will be informed through existing officer time, and through additional expert advice where needed.

Removal of this Proposal will not have an impact, so long as other significant transport measures are subject to a public advisory boards.

***Proposal 45: Explore the need for legislative change to ensure emerging technology and innovation benefits the Square Mile.***

This Proposal will continue to deliver transport innovation and technology trials across the City, including trials on (among others) technology assisting some protected groups.

The Proposal will be updated to reference changes in Proposals 25-28 around introducing and formalising regulatory powers for dockless cycles and e-scooters respectively.

The EqIA identified scope for a bolder statement concerning accessibility within proposed new transport innovations and services. However, no significant negative impacts to people with protected characteristics are anticipated at this time.

***Outcome: The Square Mile benefits from better transport connections***

This Outcome contains six Proposals and the City Corporation are proposing make some changes, notably to Proposal 47, 48 and 49.

- Proposal 46: Support and champion better national and international connections to the Square Mile
- Proposal 47: Support and champion improved connections to the Square Mile from Greater London and the surrounding region
- Proposal 48: Support the increased use of the Thames for passenger services
- Proposal 49: Review bus provision across the City
- Proposal 50: Support the Mayor of London in retaining locally-generated taxation

- Proposal 51: Encourage continued Government Investment in Major London transport Projects

For the purpose of the EIA we will review Proposals 46 and 47, and 50 and 51 together.

### ***Proposal 46 & 47***

- Proposal 46: Support and champion better national and international connections to the Square Mile
- Proposal 47: Support and champion improved connections to the Square Mile from Greater London and the surrounding region

The City Corporation are proposing to make no changes to Proposal 46 .

Proposal 47 update this Proposal in line with Climate Action Strategy, the opening of the Elizabeth Line and further ambitions for accessibility improvements. This will ensure the impact of all relevant transboundary (scope 3) travel is measured within CAS programme, recognising the commitment to net zero and progress that can be made on all travel emissions. Although there are changes expected to the national priorities on rail links that we currently support the City Corporation are not proposing any major changes to this Proposal, we recommend that they take the following points into consideration:

### **Positive impacts**

- ✓ Improving air quality
- ✓ Accessibility improvements to rail and Underground stations in the Square Mile, as outlined in Proposal 19, including Liverpool Street Station
- ✓ Enhancing the coverage and frequency of 24-hour public transport services in central London, including increasing the number of lines operating night-tube services, enhancing the 24hour bus network, and improving night-time DLR and rail operations, including Crossrail. Any extensions to operating hours must take account of the need to avoid noise and other impacts on people living in, working in, studying in, and visiting the City

### **Potential negative impacts**

- The importance of all new development of transport solutions maintaining and enhancing accessibility by being inclusive from the outset should be emphasised.

### **Actions taken by the City Corporation**

EQIA: City of London Transport Strategy

Proposal 1b will support best practice and take an inclusive approach to delivering services, public spaces and transport services, and the City Corporation will continue to work with their partners to achieve this.

### ***Proposal 48: Support the increased use of the Thames for passenger services***

The City Are proposing some changes to this Proposal. Activities will include promotion of river services, enhancing walking routes to Blackfriars and Tower piers and improving overall pier efficiency and accessibility. There is a commitment to working with TfL and river service operators to encourage closer alignment of fares on river services and the remainder of the public transport network to improve accessibility and viability of river services as a transport mode.

#### **Positive impacts**

✓ This is very positive and beneficially impacts many protected groups.

No further negative impacts have been identified (arising from this change) at this time.

### ***Proposal 49: Review bus provision across the City***

This is a particularly important Proposal as the bus network is the most common transport method used by many protected groups, after walking. The importance of the bus network for providing accessible transport access around the City and as a transport connection to other parts of London is huge. Although the City Corporation are not proposing any major changes to this Proposal, we recommend that they take the following points into consideration.

#### **Potential negative impacts**

- However, bus routes terminating at dispersed locations without integrated interchanges and connections are increasingly common following recent TfL route reviews and are only serving to make journeys for disabled people increasingly onerous and inaccessible. How to address these measures with TfL would be useful to mitigate impact on protected groups.

### ***Proposal 50 & 51***

- Proposal 50: Support the Mayor of London in retaining locally-generated taxation
- Proposal 51: Encourage continued Government Investment in Major London transport Projects

These have been grouped together as they support the Mayor of London in retaining locally-generated taxation and investing in transport infrastructure. No Changes are being proposed to these Proposals.

Significant investment across Greater London is required to ensure the Capital remains an attractive place to live, work, study. Although the City Corporation are not proposing any major changes to this Proposal, we recommend that they take the following into consideration

### **Potential negative impacts**

- Any investment in transport infrastructure should explicitly state and require to improve accessibility and inclusivity.

Through Proposal 1b will support best practice and take an inclusive approach to delivering our services and investing in programmes to deliver the Transport Strategy, in addition we will continue to work with and challenge our partners to improve accessibility and inclusivity.

### ***Delivering the Strategy***

This contains three Proposals and the City Corporation are not proposing to make any major changes to this Proposal at this time.

- Proposal 52: Use temporary interventions and trials to accelerate the pace of delivery
- Proposal 53: Improve our monitoring of transport in the Square Mile
- Proposal 54: Support change across London that is aligned with this Strategy

### ***Proposal 52: Use temporary interventions and trials to accelerate the pace of delivery***

The City Corporation are proposing to delete this Proposal and no negative impacts arising from this change have been identified at this time.

### ***Proposal 53: Improve our monitoring of transport in the Square Mile***

The City Corporation will continue to improve the quantity and quality of data they hold on transport in the City. In addition they propose to update the Proposal to include the following:

- Ensure data collection on people's view of the quality of the streets includes a sample of protected characteristics groups.
- New more specific measurement on progress against CAS carbon savings contribution to CAS targets.

## **Positive impacts**

- ✓ The Proposal has been updated to include a focus on monitoring progress in tackling Key Targets which relate to promoting equality.

Other recommendations include adding specific monitoring of use by protected groups of transport methods and their experiences, including any barriers they may face. For example including in Table of Key Targets

- Number of people killed and seriously injured on our streets: *Target should explicitly monitor the groups most at risk - older, disabled, children and BAME groups*
- People using our streets and public spaces are safe and feel safe: Target should explicitly survey and monitor protected groups.

In addition the Strategy should confirm that the City Corporation will continue to ensure equality of opportunity and Outcome and minimising environment effects are at the forefront of decision making for their transport system, with all decisions taken in accordance with statutory equalities requirements.

Through Proposal 1b will support best practice and take an inclusive approach to monitoring the delivery of the Transport Strategy.

### ***Proposal 54: Support change across London that is aligned with this Strategy***

The City Corporation are not proposing any major changes to this Proposal and no negative impacts arising from this change have been identified at this time.

## **Partnerships and leadership**

The need to work with a range of partners to achieve the vision, aims and Outcomes for streets and transport in the Square Mile is recognised. This will include working in partnership with (among others) campaign organisations and special interest groups.

## **Conclusion**

Many of the Strategy Proposals are likely to have a positive impact on reducing inequalities. This is especially the case given travel patterns to the City of London (with the largest proportion of trips made by walking and public transport), and the very limited potential for any increase in car use (due to very limited road space and car parking).

Many of the Proposal Changes support measures that will primarily increase space for pedestrians. This will not only benefit those making trips entirely on foot but will



also benefit the large share of trips made by public transport, given the likely need to access public transport stops by walking. This will disproportionately benefit those groups who are more reliant on walking (such as those as 65+), as well as those who may find narrow and cluttered footways particularly difficult to negotiate (such as disabled people or people walking with prams).

There are a number of Proposal Changes that will support the City Corporation's adoption of the Climate Action Strategy which set out how the organisation will achieve net zero, build climate resilience and champion sustainable growth, both in the UK and globally, over the next two decades. Vulnerable people are also like to benefit disproportionately from co-benefits associated with a transition to net zero carbon emissions, such as air pollution, furthermore people with disabilities and long-term health conditions may be more likely to be vulnerable to the impacts of climate change, such as heat waves and extreme weather events, due to a combination of health issues and lower average incomes. So many of these considerations within Proposals will be positive.

Given the above and the limited space that is generally available on streets in the City, and the ambition to reduce traffic there may be some impacts on other modes. There will also be some impacts on car travel, primarily through more indirect routes, but this will be mitigated by allowing for access and drop-offs. However, the addition of Proposal 1b will ensure the City Corporation take an inclusive approach to all project delivery and policy-making that supports and achieves the delivery of the Transport Strategy.

## **Recommendations**

1. Further commitment to advancing equality of opportunities across protected characteristics and foster strong community relations, embedded in the strategic framework of the Strategy, referenced directly in the Outcomes underpinning the Vision.
2. Further focused consultation with disabled and other protected characteristic groups to work out ways to mitigate any negative impacts and enhance positive impacts of Strategy Proposals.
3. The Strategy should include a strong focus on monitoring progress in tackling Key Targets which relate to promoting equality. There should be a robust monitoring and evaluation framework to measure and annually report on performance.
4. Effective monitoring of air, traffic levels, active travel, and impact of car reduction Proposals on those disabled people who require a car for travel and

cannot use other forms of transport. Targets should explicitly survey and monitor protected groups.

5. The Strategy should confirm that the City Corporation will continue to ensure equality of opportunity and ensuring all decisions are taken in accordance with statutory equalities requirements.
6. Use of more inclusive language within the Strategy.

## Next Steps

This EQIA is part of the development of the Strategy to ensure it continues to reflect the priorities of City residents, workers and businesses, changing circumstances and developments in transport technology.

The Strategy development will continue to :

- Align with the review of the City Plan
- Allow time for travel and work patterns to settle post Covid-19
- Allow for further engagement and consultation

The impacts identified and recommendations identified in this report will inform the further development of Strategy Proposals ahead of City Corporation Committee approvals and public consultation expected to take place at the end of the year.

The Transport Strategy Review Engagement Plan will:

1. Identify internal and external stakeholders and understand their needs and priorities.
2. Build on existing relationships and establish and maintain new relationships. Noting that the relationships will vary significantly according to level of engagement and interest.
3. Proactively engage to ensure that the review of the Strategy is informed by a wide range of stakeholders, including the public, and reflects the needs of City workers, residents, businesses, students and visitors.
4. Build support for the Transport Strategy by clearly setting out the challenges for transport in the City and involving stakeholders in the development of solutions to these challenges.
5. Keep all stakeholders engaged and informed on the Transport Strategy review at a level that meets their expectations. A clear hierarchy of communication between stakeholder groups will ensure that groups closer to the project are engaged and kept informed ahead of the wider groups.
6. Ensure there are no surprises for any stakeholder at any stage through clear and regular communication of messages in an appropriate format.

The engagement will include a range of stakeholders including the stakeholders below:

- Transport for London
- Greater London Authority
- City of London Police
- Neighbouring boroughs
- Modal & special interest groups e.g. London Cycling Campaign, Living Streets
- Trade representative groups, e.g. Licensed Taxi Drivers Association
- Business representative groups and networks, e.g. Heart of the City, Active City Network
- NHS and Emergency Service Partners
- City Property Association
- Business Improvement Districts
- City of London Access Group
- City workers, residents, visitors

A separate EQIA will be undertaken for the Consultation and CAE will review the planned public consultation engagement process to be undertaken by the City Corporation. CAE have recommended this also includes focussed engagement with protected groups and that the Strategy reflect changing demographic of the City population with respect to protected groups.