

## **Enfield Equality Impact Assessment (EqIA)**

## Introduction

The purpose of an Equality Impact Assessment (EqIA) is to help Enfield Council make sure it does not discriminate against service users, residents and staff, and that we promote equality where possible. Completing the assessment is a way to make sure everyone involved in a decision or activity thinks carefully about the likely impact of their work and that we take appropriate action in response to this analysis.

The EqIA provides a way to systematically assess and record the likely equality impact of an activity, policy, strategy, budget change or any other decision.

The assessment helps us to focus on the impact on people who share one of the different nine protected characteristics as defined by the Equality Act 2010 as well as on people who are disadvantaged due to socio-economic factors. The assessment involves anticipating the consequences of the activity or decision on different groups of people and making sure that:

- unlawful discrimination is eliminated
- opportunities for advancing equal opportunities are maximised
- opportunities for fostering good relations are maximised.

The EqIA is carried out by completing this form. To complete it you will need to:

- use local or national research which relates to how the activity/ policy/ strategy/ budget change or decision being made may impact on different people in different ways based on their protected characteristic or socioeconomic status;
- where possible, analyse any equality data we have on the people in Enfield who will be affected eg equality data on service users and/or equality data on the Enfield population;
- refer to the engagement and/ or consultation you have carried out with stakeholders, including the community and/or voluntary and community sector groups you consulted and their views. Consider what this engagement showed us about the likely impact of the activity/ policy/ strategy/ budget change or decision on different groups.

The results of the EqIA should be used to inform the proposal/ recommended decision and changes should be made to the proposal/ recommended decision as a result of the assessment where required. Any ongoing/ future mitigating actions required should be set out in the action plan at the end of the assessment.



## **Section 1 – Equality analysis details**

Title of service activity / policy/ strategy/ budget change/ decision that you are assessing	Introducing the proposed Bowes Road Bus Lane (Under Experimental Powers)
Team/ Department	Highways, Traffic & Parking (David Taylor)
<b>Executive Director</b>	Perry Scott
Cabinet Member	CIIr Rick Jewell
Author(s) name(s) and contact details	Jonathan Goodson jonathan.goodson@enfield.gov.uk
Committee name and date of decision	

Date the EqIA was reviewed by the Corporate Strategy Service	14.03.24
Name of Head of Service responsible for implementing the EqIA actions (if any)	David B Taylor
Name of Director who has approved the EqIA	Doug Wilkinson

The completed EqIA should be included as an appendix to relevant EMT/ Delegated Authority/ Cabinet/ Council reports regarding the service activity/ policy/ strategy/ budget change/ decision. Decision-makers should be confident that a robust EqIA has taken place, that any necessary mitigating action has been taken and that there are robust arrangements in place to ensure any necessary ongoing actions are delivered.

## Section 2 – Summary of proposal

Please give a brief summary of the proposed service change / policy/ strategy/ budget change/project plan/ key decision

### Please summarise briefly:

What is the proposed decision or change? What are the reasons for the decision or change?



What outcomes are you hoping to achieve from this change? Who will be impacted by the project or change - staff, service users, or the wider community?

## **Summary of Proposal**

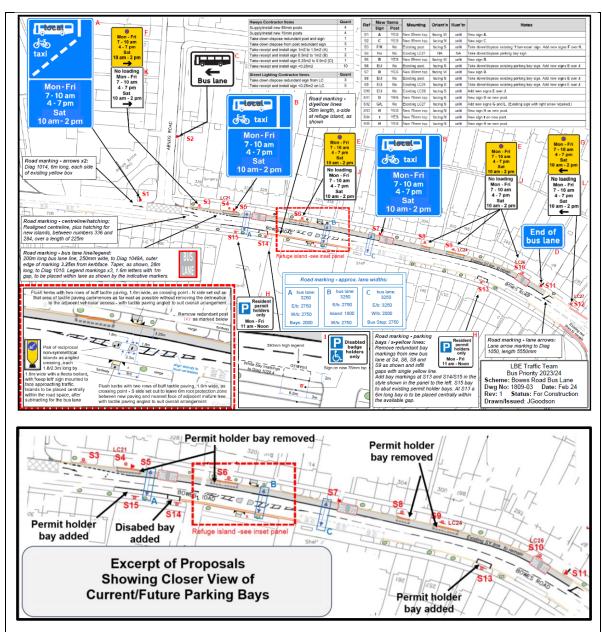
The Council proposes to introduce, under experimental powers, a 200m long section of new bus lane on the borough managed A1110 Bowes Road at its eastbound approach to the TfL-managed A406 North Circular Road. This will, broadly, reallocate to moving buses a portion of road space currently given over to stationary domestic vehicles. The marked parking spaces there presently accommodate a maximum of 7 cars in total. An operational period as follows has been proposed to best match the times, across the week, when surveys show congestion levels are high:

Mon to Fri: 7am to 10am and 4pm to 7pm, and Saturday 10am to 2pm.



The drawing below details the signage that is needed to accompany the new bus lane, and also sets out the addition of the new refuge island and disabled bay and indicates the before and after position with regard to parking facilities and parking restrictions.

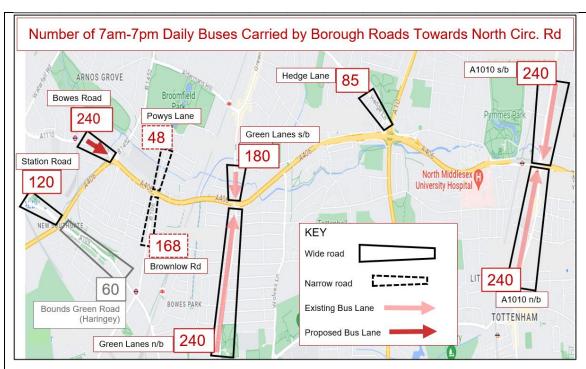




Various sections of bus lane on Enfield streets are seen in similar context on the approaches to the busy signalised intersections of the North Circular Road, their purpose being to afford buses priority over other traffic at congested locations to increase the appeal and reliability of local bus services.

With Bowes Road (see below) having similarity to other streets in terms of being relatively wide and conveying around 240 daily buses towards the junction in the 7am to 7pm period, it was deemed well-suited for the addition of a bus lane.





#### **Intended Outcome**

The intended outcome is to improve journey times for the 4 high-frequency bus services travelling eastbound on Bowes Road. Comparison of TfL-data in the before and after period will indicate to what extent this has been achieved during the trial period. The result would be to increase the appeal of local bus services - which helps minimise the various drawbacks of excessive urban car usage - and shorten the journeys of those presently using buses. If each peak period bus (4 services each with 5 buses per hour) carried 30 passengers, it can be calculated that across the 6 operational hours each weekday, a betterment to 3,600 journeys by Londoners results each day.

#### **Affected Parties**

**Bus Users:** Only positive impacts are identified applying to bus users, namely quicker journey times and better service reliability.

**Fronting Households:** In addition to bus users the group most directly affected is the occupants of the fronting homes. Although mostly buffered by having multiple off-street parking spaces, the occupants of the 27 north side homes within the section of interest face the impact of the removal of a small number of resident parking spaces from directly outside their homes. Some inconvenience to their visitor parking might also be anticipated under the changes.

**Other drivers:** The fact that the lost bays are replaced, in similar number, by bays on the other side of the road mitigates the impact on residents and, in the view of officers, results in minimal impact on other drivers who might head to the area seeking parking space.



#### **Consultation and engagement**

The Council's letter drop, accompanying its February 2023 engagement activity, covered 72 homes on Bowes Road. Those homes directly fronting the proposed bus lane on the northern side numbered 27; those opposite numbered 17; the remaining 28 homes receiving letters were beyond the limits of the bus lane. From the 27 households most directly affected, 10 submitted objections, including the 2 homes with no off-street parking. From 17 households situated opposite the proposed extent of bus lane, 5 submitted objections. Across the full 72-home direct consultation area, which extended some way west of the limits of the bus lane, 20 objections were received in total: 12 from the northern side, 8 the southern, with zero expressions of support.

Analysis across the full set of submissions identified 13 different points of objection. The majority of these are not deemed to have equality implications.

Objection	Notes	Equality Implications
Obj1: the assertion that the bus lane does not suit the character of the street	The point is disputed.	In any case, no equality implications identified.
<b>Obj2</b> : the assertion that the short bus lane serves no purpose	The point is disputed.	In any case, no equality implications identified.
<b>Obj3</b> : the assertion that the bus lane will add to congestion	The point is disputed.	In any case, no equality implications identified.
Obj4: the assertion that fronting homes will experience more noise or vibration	The point is disputed.	In any case, no equality implications identified.
<b>Obj5</b> : the assertion that changes to the signalised junction could achieve the same benefits	The point is disputed.	In any case, no equality implications identified.
Obj6: the idea that traffic calming or similar should accompany the bus lane	Outside scope of the scheme.	Accordingly, no equality implications identified.
Obj7: the assertion that the loss of domestic parking is excessive	The degree of impact is disputed but the point merits consideration.	Impacts on protected groups considered at Section 3 below. (Mitigation includes replacing lost parking bays at opposing kerbside.)
<b>Obj8</b> : the assertion that the restriction on loading activity is excessive	The degree of impact is disputed.	In any case, no equality implications identified.
Obj9: the assertion that the loss of parking for nearby non-domestic premises is excessive	Unlikely to be significant judging by absence of objections from relevant premises.	Accordingly, no equality implications identified.



Obj10a: assertion that emerging from driveways is made more difficult	The degree of impact is disputed.	In any case, no equality implications identified.
Obj10b: the idea that crossing the road from opposite side parking bays is too difficult	Merits consideration.	Impacts on protected groups considered at Section 3 below. (Mitigated by addition of refuge island crossing point.)
Obj11: the idea that the proposals are too unpopular to be taken forward.	The point is disputed.	In any case, no equality implications identified.
Obj12: the report of school minibuses blocking crossovers during dropping off events	An existing issue that the proposals are more likely to improve than worsen.	Accordingly, no equality implications identified.
Obj13: domestic access hindered for disabled occupant of home lacking crossover	Merits consideration.	Impacts on protected groups considered at Section 3 below. (Mitigated by commitment to seek to facilitate provision of formal crossover.)

## Section 3 – Equality analysis

#### Age

This can refer to people of a specific age e.g. 18-year olds, or age range e.g. 0-18 year olds.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people of a specific age or age group (e.g. older or younger people)?

Please provide evidence to explain why this group may be particularly affected.

#### **Consideration of Positive Impacts:**

Overall, it is anticipated that the increased efficiency and reliability of bus journeys on weekdays will have a positive impact on all residents.

Referring to those who benefit from the scheme, bus use is an affordable alternative to car use for older residents on fixed incomes, as older people of pensionable age are eligible for free travel across London and free local bus journeys nationally. By contrast, car ownership comes with substantial annual costs (insurance, car tax, servicing fees, etc) even if the vehicle is seldom used. Young people and children are also identified as gaining particular benefit.

#### **Consideration of Unwanted Impacts:**



Referring to the unwanted parking impacts some of the fronting households may feel apply, no likelihood of differential impact is identified with regard to age. From the 2 households of the 27 fronting homes that lack off-street parking space, the age of those making up the household is not known. Nor could this be known in terms of those who might take up occupation in years or decades to follow. No reason is identified to suspect a disproportionate predominance of those more vulnerable due to age (either the very young, or the elderly) across the small cohort of affected homes.

Where alternative parking space must be made use of on the opposite side of the road henceforth, then gaining access thereto and therefrom may pose greater challenge for the elderly or for those conveying infants and young children. However, mitigation on this point is built into the designs by the provision of a refuge island, which will aid crossing movements by users of the relocated parking space as well as by various other road users, such as those visiting the swimming pool and library complex and those using the nearby westbound bus stop.

One particular household has raised issues with their future access to the property around the challenges of caring for a disabled child. However, the decision report seeks to ensure full mitigation to this individual case by seeking to facilitate the addition of a crossover, subject to necessary approvals.

Considering whether the loss of parking space might make visiting more difficult, and thus have an isolating effect disproportionately felt by the elderly, the section above sets out how this effect is mitigated by the provision of the alternative spaces and of the refuge island crossing point to help access them. Furthermore, surveys indicate that the lost parking spaces were typically occupied to a level only a little above 50%, while the residents of the wider area benefit from zonal parking controls to deter commuter parking and low-density housing that affords high overall parking capacity, both on-street and in private spaces. Altogether, then, it is not a neighbourhood where finding a parking space when visiting an elderly person is likely to be unduly problematic. By reducing the proposed operational hours (the times first consulted upon were 7am to 7pm all-week) parking and dropping off at the northern kerbside is left unrestricted during quieter periods. By this amendment better options remain for making visits by car in off-peak periods. The area is also very well served by public transport.

#### **Summary:**

As discussed above, the ages are not known for the residents who face the impact of the removal of a small number of resident parking spaces from directly outside their homes. However, where any such unwanted impacts might apply most particularly to the elderly or very young, they are well mitigated for. Relative to those potentially disadvantaged by the changes, a much larger group of people (local bus users) gain benefit from the measures being introduced and amongst this group we can say it is likely that the very young and the elderly are over-



represented; those under eighteen due to not being old enough to have passed driving tests; and those of pensionable age due to receiving free bus travel.

#### Mitigating actions to be taken

The proposals were amended in response to the consultation feedback around residents finding it difficult to cross the street to access relocated parking spaces. This issue may have disproportionate impact on the very young or the elderly. The inclusion in revised proposals of a new refuge island crossing point provides a good degree of mitigation to the issue identified.

## **Disability**

A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on the person's ability to carry out normal day-day activities.

This could include: physical impairment, hearing impairment, visual impairment, learning difficulties, long-standing illness or health condition, mental illness, substance abuse or other impairments.

Will the proposed change to service/policy/budget have a **differential impact** [positive or negative] on people with disabilities?

Please provide evidence to explain why this group may be particularly affected.

#### **Consideration of Positive Impacts:**

Overall, it is anticipated that the increased efficiency and reliability of bus journeys on weekdays will have a positive impact on all residents.

Referring to those who benefit from the scheme, it is likely that affordable and reliable bus services will be judged of particularly high value by those who have limitations in affording a car or being capable of driving one, which might apply disproportionately to the less able. It is set out above that the scheme is likely to improve the reliability of bus services, to the benefit of all service users. Amongst the relocated parking spaces provided on the southern side of the road, a disabled bay is proposed. While disabled drivers can make use of various parking spaces free of charge (permit holder bays, for example) that are restricted or on a pay-to-park basis for other drivers, those drivers are given greatest opportunity to actually find convenient parking space clear of other vehicles, in the view of officers, when spaces are set aside explicitly for blue badge holders. Thus the addition of the bay is of benefit to disabled drivers.

#### **Consideration of Unwanted Impacts:**



Referring to the unwanted parking impacts some households may feel apply (as covered above with regard to age) it is difficult to know if the small cohort has at present, or will have in future, a greater-than-average component of those vulnerable due to disabilities.

One particular household has raised issues with their future access to the property around the challenges of caring for a disabled child. However, the decision report seeks to ensure full mitigation to this individual case by seeking to facilitate the addition of a crossover, subject to necessary approvals.

Where alternative parking space must be made use of on the opposite side of the road henceforth, then gaining access thereto and therefrom may pose greater challenge for the less able. However, mitigation on this point is built into the designs by the provision of a refuge island, which will aid crossing movements by users of the relocated parking space as well as by various other road users, such as those visiting the swimming pool and library complex and those using the nearby westbound bus stop.

Considering whether the loss of parking space might make visiting by friends or welfare practitioners more difficult, and thus have an effect disproportionately felt by the disabled, the section above sets out how this effect is mitigated by the provision of the alternative spaces and of the refuge island crossing point to help access them. Furthermore, surveys indicate that the lost parking spaces were typically occupied to a level only a little above 50%, while the residents of the wider area benefit from zonal parking controls to deter commuter parking and low-density housing that affords high overall parking capacity, both on-street and in private spaces. Altogether, then, it is not a neighbourhood where finding a parking space when visiting a less able person is likely to be unduly problematic. By reducing the proposed operational hours (the times first consulted upon were 7am to 7pm all-week) parking and dropping off at the northern kerbside is left unrestricted during quieter periods. By this amendment better options remain for making visits by car in off-peak periods. The area is also very well served by public transport.

#### Summary:

It is not known whether the small group most directly affected by the unwanted impacts has a greater-than-average component of those vulnerable due to being disabled. One particular household has raised issues with their future access to the property around the challenges of caring for a disabled child. However, the decision report seeks to ensure full mitigation to this individual case by seeking to facilitate the addition of a crossover, subject to necessary approvals. More generally, where any such unwanted impacts might apply most particularly to the disabled, they are well mitigated for. Relative to those potentially disadvantaged by the proposals (fronting households), a much larger group of people (local bus users) gain benefit from the measures being introduced and amongst this group we can say it is likely that the less able are over-represented, having greater difficulty in driving cars.



### Mitigating actions to be taken

The proposals were amended in response to the consultation feedback around parking provision for the less able and around the issue of hindered domestic access for a disabled occupant of one particular household lacking a formal crossover. These issues have disproportionate impact on the less able. Full mitigation is provided to this individual case by the decision report being explicit in recommending to seek to facilitate the addition of a crossover, subject to necessary approvals. Mitigation to the more general concerns around disabled parking provision is provided by the addition of the disabled bay.

#### **Gender Reassignment**

This refers to people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on transgender people?

Please provide evidence to explain why this group may be particularly affected.

Overall, it is anticipated that the increased efficiency and reliability of bus journeys on weekdays will have a positive impact on all residents.

No adverse impacts are identified applying to this category.

#### Mitigating actions to be taken

N/A

#### **Marriage and Civil Partnership**

Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, where-as a marriage can be conducted through either religious or civil ceremonies. In the U.K both marriages and civil partnerships can be same sex or mixed sex. Civil partners must be treated the same as married couples on a wide range of legal matters.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people in a marriage or civil partnership?

Please provide evidence to explain why this group may be particularly affected.



Overall, it is anticipated that the increased efficiency and reliability of bus journeys on weekdays will have a positive impact on all residents.

No adverse impacts are identified applying to this category.

#### Mitigating actions to be taken

N/A

#### **Pregnancy and maternity**

Pregnancy refers to the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on pregnancy and maternity?

Please provide evidence to explain why this group may be particularly affected.

Overall, it is anticipated that the increased efficiency and reliability of bus journeys on weekdays will have a positive impact on all residents.

No adverse impacts are identified applying to this category.

### Mitigating actions to be taken

N/A

#### Race

This refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people of a certain race?

Please provide evidence to explain why this group may be particularly affected.

Overall, it is anticipated that the increased efficiency and reliability of bus journeys on weekdays will have a positive impact on all residents.

No adverse impacts are identified applying to this category.

#### Mitigating actions to be taken

N/A



#### Religion and belief

Religion refers to a person's faith (e.g. Buddhism, Islam, Christianity, Judaism, Sikhism, Hinduism). Belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who follow a religion or belief, including lack of belief?

Please provide evidence to explain why this group may be particularly affected.

Overall, it is anticipated that the increased efficiency and reliability of bus journeys on weekdays will have a positive impact on all residents.

No adverse impacts are identified applying to this category.

### Mitigating actions to be taken

N/A.

#### Sex

Sex refers to whether you are a female or male.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on females or males?

Please provide evidence to explain why this group may be particularly affected.

Overall, it is anticipated that the increased efficiency and reliability of bus journeys on weekdays will have a positive impact on all residents.

No adverse impacts are identified applying to this category.

### Mitigating actions to be taken

N/A.

#### **Sexual Orientation**

This refers to whether a person is sexually attracted to people of the same sex or a different sex to themselves. Please consider the impact on people who identify as heterosexual, bisexual, gay, lesbian, non-binary or asexual.



Will this change to service/policy/budget have a **differential impact [positive or negative]** on people with a particular sexual orientation?

Please provide evidence to explain why this group may be particularly affected.

Overall, it is anticipated that the increased efficiency and reliability of bus journeys on weekdays will have a positive impact on all residents.

No adverse impacts are identified applying to this category.

## Mitigating actions to be taken

N/A

#### **Care Experience**

This refers to a person who has spent 13 weeks or more in local authority care.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people with care experience?

Please provide evidence to explain why this group may be particularly affected.

Overall, it is anticipated that the increased efficiency and reliability of bus journeys on weekdays will have a positive impact on all residents.

There is growing awareness and an increasing body of research regarding the additional barriers care-experienced young adults may face. Care leavers are often vulnerable young adults and are more likely to be over represented in socially excluded populations such as the prison population, the homeless population, more likely to suffer from mental health difficulties than their peers, and less likely to be in education, employment or training<sup>1</sup>.

Overall, it is anticipated that the increased efficiency and reliability of bus journeys on weekdays will have a positive impact on care experienced adults. Care-experienced young adults are more likely to be socio-economically disadvantaged and likely to use public transport. The proposed measures bring benefits to bus users and bus use is a far more affordable option than car ownership for those on limited incomes, especially those who are eligible for free travel.

Mitigating	actions t	to be	taken

N/A

<sup>&</sup>lt;sup>1</sup> Ofsted, Equalities impact assessment: introducing a separate judgement about care leavers within the inspection of local authority children's services



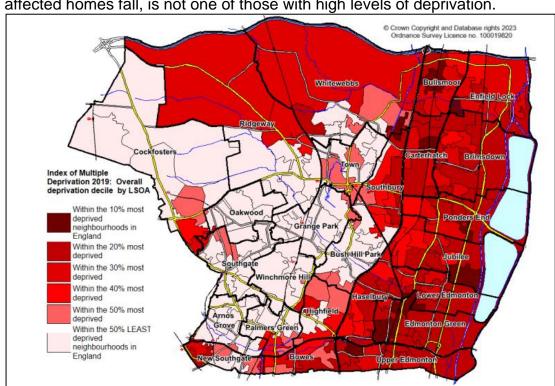
## Socio-economic deprivation

This refers to people who are disadvantaged due to socio-economic factors e.g. unemployment, low income, low academic qualifications or living in a deprived area, social housing or unstable housing.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who are socio-economically disadvantaged?

Please provide evidence to explain why this group may be particularly affected.

It can be seen below that Arnos Grove ward, into which the small number of affected homes fall, is not one of those with high levels of deprivation.



The proposed measure brings minor drawbacks around the convenience of car use (due to the relocation beyond the fronting kerbside of the 7 parking bays) that apply to a small set of households. However, this group is not likely to be notably comprised of those suffering with deprivation.

But the proposed measures bring benefit to bus users, and in this regard apply to a much larger number of people (perhaps a hundred times larger) insofar as daily journeys are concerned. And amongst the latter, levels of deprivation might be expected to be higher than the borough average, as bus use is a far more



affordable option than car ownership for those on limited incomes, especially those who are eligible for free travel.

#### Mitigating actions to be taken.

No mitigating actions are identified relative to this category.

## Section 4 – Monitoring and review

How do you intend to monitor and review the effects of this proposal?

Who will be responsible for assessing the effects of this proposal?

The Council's traffic engineering manager will be responsible for seeking the relevant bus journey time data from TfL covering the before and after period, by which the degree of benefit to bus journey times can be assessed.

The Council's traffic engineering manager will be responsible, furthermore, for inviting feedback on the reality of the new layout from residents in the first six months of operation, which will help weigh up the drawbacks against the benefit, especially with regard to any detriment to protected groups.

# Section 5 – Action plan for mitigating actions

Any actions that are already completed should be captured in the equality analysis section above. Any actions that will be implemented once the decision has been made should be captured here.

Identified Issue	Action Required	Lead officer	Timescale/By When	Costs	Review Date/Comments
Monitoring and review	Arrange monitoring and review activity as above.	Jonathan Goodson (Traffic Engineering Manager)	November 2024	TBC	