

Equality Impact Assessment

Stage 1: The proposed change that is being assessed and responsibility for the EQIA

Name of the proposed change	Healthy School Streets (Group 4) – making eight ETMO schemes permanent																											
Purpose of proposed change	<p>The Council’s Draft Parking Policy 2023 aims to effectively manage parking provision across the borough in line with the Corporate Plan and the borough’s growth objectives. This policy details the School Streets objectives, to ensure we secure a healthy and safe environment near to schools and to help children and parents use cars less and to walk, cycle and use public transport more. The school run presents a particularly harmful combination of air pollution and inactivity for our children and parents.</p> <p>It is recommended to make the following eight experimental traffic orders permanent:</p> <table border="1" data-bbox="831 687 2112 1433"> <thead> <tr> <th data-bbox="831 687 1245 715">School</th> <th data-bbox="1245 687 1731 715">Affected road(s)</th> <th data-bbox="1731 687 2112 715">Ref</th> </tr> </thead> <tbody> <tr> <td data-bbox="831 715 1245 742">Harris Academy Invictus</td> <td data-bbox="1245 715 1731 742">Lennard Road, Croydon</td> <td data-bbox="1731 715 2112 742">HARRISINVICTUSHSS/2023</td> </tr> <tr> <td data-bbox="831 742 1245 796">Harris Academy Beulah Hill</td> <td data-bbox="1245 742 1731 796">a) Spurgeon Road, South Norwood b) Spurgeon Avenue, South Norwood</td> <td data-bbox="1731 742 2112 796">HARRISUBHHSS/2023</td> </tr> <tr> <td data-bbox="831 796 1245 823">Oasis Academy Byron</td> <td data-bbox="1245 796 1731 823">a) St David’s, Coulsdon</td> <td data-bbox="1731 796 2112 823">OASISBYRONHSS/2023</td> </tr> <tr> <td data-bbox="831 823 1245 877">Elmwood Infant and Junior Schools</td> <td data-bbox="1245 823 1731 877">a) Greenwood Road, Croydon b) Lodge Road, Croydon</td> <td data-bbox="1731 823 2112 877">ELMWOODHSS/2023</td> </tr> <tr> <td data-bbox="831 877 1245 1099">The Minster Nursery and Infant School and The Write Time School</td> <td data-bbox="1245 877 1731 1099">a) Warrington Road, Croydon b) Waynflete Avenue, Croydon c) Ludford Close, Croydon d) St Leonard’s Road, Croydon e) Ravenswood Road, Croydon f) Harrison’s Rise, Croydon g) Eland Road, Croydon h) Eland Place, Croydon</td> <td data-bbox="1731 877 2112 1099">WARRINGTONHSS/2023</td> </tr> <tr> <td data-bbox="831 1099 1245 1262">Kensington Primary School & Norbury High School for Girls</td> <td data-bbox="1245 1099 1731 1262">a) Kensington Avenue, Norbury b) Buckingham Avenue, Norbury c) Buckingham Gardens, Norbury d) Golf Close, Norbury e) Willowtree Way, Norbury f) Hawthorn Avenue, Norbury</td> <td data-bbox="1731 1099 2112 1262">KENSINGTONHSS/2023</td> </tr> <tr> <td data-bbox="831 1262 1245 1370">Rockmount Primary School</td> <td data-bbox="1245 1262 1731 1370">a) Rockmount Road, Upper Norwood b) Orleans Road, Upper Norwood c) Chevening Road, Upper Norwood d) Ilkley Close, Upper Norwood</td> <td data-bbox="1731 1262 2112 1370">ROCKMOUNTHSS/2023</td> </tr> <tr> <td data-bbox="831 1370 1245 1433">St James The Great RC Primary & Nursery School</td> <td data-bbox="1245 1370 1731 1433">a) Windsor Road, Thornton Heath b) Apostle Way, Thornton Heath</td> <td data-bbox="1731 1370 2112 1433">STJAMESHSS/2023</td> </tr> </tbody> </table>	School	Affected road(s)	Ref	Harris Academy Invictus	Lennard Road, Croydon	HARRISINVICTUSHSS/2023	Harris Academy Beulah Hill	a) Spurgeon Road, South Norwood b) Spurgeon Avenue, South Norwood	HARRISUBHHSS/2023	Oasis Academy Byron	a) St David’s, Coulsdon	OASISBYRONHSS/2023	Elmwood Infant and Junior Schools	a) Greenwood Road, Croydon b) Lodge Road, Croydon	ELMWOODHSS/2023	The Minster Nursery and Infant School and The Write Time School	a) Warrington Road, Croydon b) Waynflete Avenue, Croydon c) Ludford Close, Croydon d) St Leonard’s Road, Croydon e) Ravenswood Road, Croydon f) Harrison’s Rise, Croydon g) Eland Road, Croydon h) Eland Place, Croydon	WARRINGTONHSS/2023	Kensington Primary School & Norbury High School for Girls	a) Kensington Avenue, Norbury b) Buckingham Avenue, Norbury c) Buckingham Gardens, Norbury d) Golf Close, Norbury e) Willowtree Way, Norbury f) Hawthorn Avenue, Norbury	KENSINGTONHSS/2023	Rockmount Primary School	a) Rockmount Road, Upper Norwood b) Orleans Road, Upper Norwood c) Chevening Road, Upper Norwood d) Ilkley Close, Upper Norwood	ROCKMOUNTHSS/2023	St James The Great RC Primary & Nursery School	a) Windsor Road, Thornton Heath b) Apostle Way, Thornton Heath	STJAMESHSS/2023
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	<p>School streets restrict access for motor traffic except resident permit holders, cyclists, emergency services and certain other groups such as carers and those with disabilities. Motor traffic is restricted from entering the School Street at pick up and drop off times, reclaiming road space to create pedestrian and cycle zones. The operational hours for each School Street are 8:00am – 9.30am and 2:00pm – 4:00pm Monday to Friday during term time only and the times are indicated by traffic signs. School Streets aim to create safer and more pleasant environment outside each school, discouraging travel to school by car and promoting walking, cycling and scooting, achieving positive health outcomes for all.</p> <p>The changes described allow each school and resident community access to the reclaimed space on the road, changing the way the streets are used. It is hoped that this new use of space by the school and community will support active travel.</p> <p>Reducing traffic from the school gates also helps to tackle air pollution, which is a significant problem for children and pregnant women. Children are particularly vulnerable to the effects of air pollution, and, in the context of School Streets, recent studies have indicated that increases in particulate matter PM_{2.5} can make individuals more susceptible to the effects of COVID-19, increasing the mortality rate. This is therefore a public health priority. Removing congested traffic and idling vehicles from the immediate vicinity of the school entrance, while creating an environment that encourages families to travel to school more actively, may have positive health outcomes for the school community. It is hoped that increased safety and reduced convenience for those driving will encourage more children and parents to walk, cycle and scoot to school.</p>
Is this a change to a policy, practice or service?	No
Who has senior level responsibility for the proposed change?	Nick Hibberd, Corporate Director of Sustainable Communities, Regeneration & Economic Recovery
Who is completing this assessment?	Jayne Rusbatch, Head of Highways & Parking
Indicate where your EQIA will be submitted to including date where known:	Cabinet – July 2024

Stage 2: Deciding what relevance the proposed change has for equality

<p>Is the proposed change likely to impact on any of the following? <i>If there is no equality relevance for either go to Stage 7 and get sign off</i></p>	<p><input checked="" type="checkbox"/> Communities <input type="checkbox"/> Employees</p>
<p>Is the impact on equality low, medium or high?</p>	<p>Medium</p>
<p>Summary of EQIA outcome:</p>	<p>In general, the Healthy School Streets benefits all the protected characteristics by providing a safer environment outside the schools due to a reduction in traffic volumes, increased road safety and improved air quality. This is expected to increase active travel which would help to address the growing levels of obesity and asthma within the borough.</p> <p>The Healthy School Street is likely to encourage residents with disabilities to undertake active travel as they would feel that the roads are safer.</p> <p>Carers of residents living within a school street zone are eligible for exemptions and details were provided in the consultation leaflet and is available on the Council's Healthy School Street webpage.</p> <p>People who do not speak English or have poor English skills may struggle to access information about the school street operation and how to apply for an exemption permit. Therefore, the Council will ensure that interpreting services are available to support residents whose first language is not English.</p>

Stage 3: Describe how the proposed change might impact on the council's ability to undertake the Public Sector Equality Duty and commitment to anti-racism (N.B. this can be both positive or negative):

<p>Eliminating discrimination, harassment, victimisation</p>	<ul style="list-style-type: none"> • The school streets schemes treat in general primary school sites, and therefore all age groups will benefit from a safer, quieter and clean street scene during pick up/drop off times. • The proportion of residents aged over 60% is 14% in Croydon. Four HSSs recommended to be made permanent have higher proportion of over 60s compared to this average: <ul style="list-style-type: none"> ○ Harris Academy Beulah Hill and Rockmount Primary School - Crystal Palace & Upper Norwood Ward – 18%,
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	<ul style="list-style-type: none"> ○ Kensington Primary School & Norbury High School for Girls – Norbury Park Ward – 17% ○ Oasis Academy Byron – Old Coulsdon Ward – 19% ● The elderly population may also benefit from HSSs as equally to the younger age groups as this would provide them with a quieter street scene such as example crossing the road outside the school may make it easier without the need to look out for moving traffic. These older people may be more reliant on travel by motor vehicle and in some cases journey times may increase as a result of the proposal, but the impact is expected to be limited and outweighed by improvements to safety and air quality. ● For children that may need to be dropped off/picked up close to the school gates, for reasons such as injuries or disabilities the school street may temporarily be a hindrance. However, the Council has made provisions for the schools to request access on their behalf in such circumstances. ● There may be individuals who are not aware that they could be eligible for an exemption even in limited special circumstances. Blue Badge holders are eligible for an exemption, as are residents who have registered carers (the carers vehicle is exempted). As a mitigation measure the Council will inform the public of the potential exemptions they may be able to apply for.
<p>Advancing equality of opportunity</p>	<ul style="list-style-type: none"> ● The schemes benefit people of all ages as it encourages travel to and from school in active forms such as walking and cycling. ● They can offer additional space where footways are narrow making areas outside the school gates less congested. For example, outside Harris Academy Beulah Hill on Spurgeon Road. ● The following HSSs provide additional benefits to other establishments within the vicinity where attendees may choose to walk/cycle: <ul style="list-style-type: none"> ○ Oasis Academy Byron – The Mulberry Bush Coulsdon Nursery, Byron Childcare Centre, Southlands Close Sheltered Housing ○ The Minsters Schools – Croydon Mandarin School ● The proportion of Croydon’s residents with a registered disability is 14%. The following HSSs are located in wards with an equal or higher proportion than the borough average: <ul style="list-style-type: none"> ○ Harris Academy Beulah Hill – Crystal Palace & Upper Norwood Ward – 14% ○ Oasis Academy Byron – Old Coulsdon Ward – 15% ○ Elmwood Junior and Infant School – Selhurst Ward – 15% ○ The Minster Schools – Waddon Ward – 15% ○ Kensington Primary School and Norbury High School – Norbury Park Ward – 15% ○ Rockmount Primary School – Crystal Palace & Upper Norwood Ward – 14% ○ St James The Great Primary and Nursery School – Thornton Heath Ward – 14%

	<ul style="list-style-type: none"> Reducing road danger also has the potential to enable more people to participate in active travel who may previously have been discouraged to do so perhaps because of their disability. For example, cycles can improve mobility and access for disabled people, many of whom do not have access to motor vehicles. The aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health for all residents and visitors.
Fostering good relations	<ul style="list-style-type: none"> Carers of residents living within a school street zone are eligible for exemptions and details were provided in the consultation leaflet and is available on the Council's School Street webpage. Local disability groups are informed of any changes to the road network Members of the public and the schools are able to contact the Highways Team on healthyschoolstreets@croydon.gov.uk to enquire about the schemes or provide feedback on their operation Officers within the Highways Team are available to meet residents, businesses and schools to discuss any issues with the school streets
Embedding anti-racism	<ul style="list-style-type: none"> People who do not speak English or have poor English skills may struggle to access information about the school street operation and how to apply for an exemption permit. Therefore, the Council will ensure that interpreting services are available to support residents whose first language is not English. Currently, 50.7% of Croydon's population are Black, Asian or Minority Ethnic. These groups are often under-represented in engagements. Therefore, information prior to making the Healthy School Streets permanent will be shared with local groups for wider dissemination to different communities.

Stage 4: What evidence has been considered and what consultation has been carried out?

Data collection	<p>School Streets aim to discourage travel to school by car and promote active travel. This is important as in Croydon, we have a growing issue with obesity in the population, including children. Croydon has the fourth largest proportion of young people in London, with one in four Croydon residents (24.5%) aged between 0-17 years*. It is known that around 1 in 5 children (21.8%) in reception were overweight or living with obesity, and this position worsens in their last year of primary school (Year 6) where around 2 in 5 children (39.5%) were overweight or living with obesity+. School Streets create healthy and safe environment near to schools, to encourage modal shift, which will in turn contribute to addressing the obesity issue.</p> <p>The 65 years plus age group makes up 13.9% of the total population in Croydon. In London, this proportion is smaller at 12.2% and in England it is much bigger at 19.6%*. There is likelihood that some of this group may be more reliant on</p>
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	<p>vehicular modes of travel, and consequently would be disadvantaged by the proposals in that they could not drive in the School Streets during the operational hours, but this is more than outweighed by the air pollution benefits. Air pollution is an important public health issue contributing to illness and shortened life expectancy, that disproportionately impacts on the most vulnerable in the population, in particular the sick, young and elderly.</p> <p>Emergency admissions for children and young people with asthma and wheeze has risen considerably in the last 5 years, forming the second highest reason for emergency admissions in Croydon for 0-18's. 7.5% of premature deaths in Croydon are linked to air pollution. Failing to address NOx and particulate matter emissions in Croydon would deprive many local people of their fundamental right to safe air.</p> <p>The 2011 Census figures showed that 14.1% of the population in Croydon had their day-to-day activities limited to some extent by a long-term health problem or disability. School Streets will not disproportionately impact on this group as eligible residents are able to apply for exemption permits, to allow them (or their nominated carer) to drive in the School Streets during the operational hours.</p> <p>* Source: Croydon Observatory www.croydonobservatory.org + Source: Patterns and trends in child obesity in Croydon; A presentation of 2019/20 NCMP data at local authority level, July 2021</p>
Consultation	During the informal and statutory consultation stages, respondents providing feedback online were given the opportunity to complete an equalities questionnaire, although this was not compulsory.

Stage 5: Identify any adverse or positive impact and mitigation steps that can be or have been taken

Guidance on Impact Scores: Consider the impact of your proposal by giving a numerical score to both the likelihood of an impact and the severity of an impact against each characteristic. This should draw upon the evidence you cited at Stage 3.

Use the key below to score the likelihood of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group.	<p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p>
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Use the key below to score the severity of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group.	1 = Low 2 = Medium 3 = High
The score for likelihood and severity are then multiplied.	e.g. Unlikely to impact =1, Low impact =1, total score =1

Characteristics		Likelihood of impact	Severity of impact	Impact score	Summary of impact (positive, negative, no impact or unknown)*	If negative or unknown, what can be or has been done to mitigate this? Please provide clear actions and timelines.**
Protected Characteristics (Equality Act 2010)	Age	3	2	6	<p>Positive – the schemes promote active travel and would benefit users of all ages.</p> <p>St Peter’s Primary School have expressed concern, stating that road safety has worsened for pupils and parents – this Healthy School Street has been recommended to be removed and would therefore encourage active travel.</p> <p>Negative – see next column</p>	<p>For children that may need to be dropped/picked up close to the school gates, for reasons such as injuries or disabilities the school street may temporarily be a hindrance. However, the council has made provisions to the schools to request access on their behalf in such circumstances.</p> <p>Conversely, older people may be more reliant on travel by motor vehicle and in some cases journey times may increase as a result of the proposal, but the impact is expected to be limited and outweighed by improvements to safety and air quality.</p>
	Disability	2	2	4	<p>Positive – the schemes promote active travel and benefit all users, regardless of disability.</p> <p>St Peter’s Primary School have expressed concern, stating that road safety has worsened for pupils and parents – this Healthy School Street has been recommended to be</p>	<p>There may be individuals who are not aware that they could be eligible for an exemption even in limited special circumstances. Residents who have registered carers are able to apply for exemption for the carer’s vehicle. As a mitigation measure the council will inform the public of the potential exemptions they may be able to apply for.</p>

Characteristics	Likelihood of impact	Severity of impact	Impact score	Summary of impact (positive, negative, no impact or unknown)*	If negative or unknown, what can be or has been done to mitigate this? Please provide clear actions and timelines.**
				removed and would therefore encourage active travel Negative – see next column	
Gender Reassignment	1	1	1	Positive - the schemes promote active travel and benefit all users, regardless of gender identity.	
Marriage or Civil Partnership	1	1	1	Positive - the schemes promote active travel and benefit all users, regardless of marital status.	
Pregnancy and Maternity	2	1	2	Positive - the schemes promote active travel and benefit all users, regardless of pregnancy status. Negative – see next column	Potential negative impact on parents during pregnancy from the driving restrictions. As a mitigation measure the council can issue temporary exemptions on a case-by-case basis if needed.
Race	1	1	1	Positive - the schemes promote active travel and benefit all users, regardless of race. Negative – see next column	People who do not speak English or have poor English skills may struggle to access information about the school street operation and how to apply for an exemption permit. Therefore, the Council will ensure that interpreting services are available to support residents whose first language is not English.
Religion or Belief	1	1	1	Positive - the schemes promote active travel and benefit all users, regardless of religious belief	
Sex	1	1	1	Positive - the schemes promote active travel and benefit all users, regardless of sex.	

Characteristics	Likelihood of impact	Severity of impact	Impact score	Summary of impact (positive, negative, no impact or unknown)*	If negative or unknown, what can be or has been done to mitigate this? Please provide clear actions and timelines.**
				More women accompany their children to school compared to men so would benefit more from the reduced congestion, increased road safety and improved air quality	
Sexual Orientation	1	1	1	Positive - the schemes promote active travel and benefit all users, regardless of sexual orientation.	

* *Unknown impact may only be used where there is no data or evidence available and must be accompanied by an action plan for how to collect this.*

** *Mitigations must be referenced in the Equalities comments of the substantive report and in its recommendations.*

Stage 6: What is the outcome of your assessment? Select one of these four options:

Decision	Definition	Conclusion - Mark 'X' below
No major change	Our analysis demonstrates that the proposed change is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.	
Adjust the proposed change	We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. If you reach this conclusion, ensure you have completed Section 5 above.	X
Continue the proposed change despite	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However,	

potential for adverse impact	there are justifiable reasons to continue as planned. If you reach this conclusion, ensure you have completed Section 4 above, clearly setting out your justifications.	
Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	

Stage 7: EQIA Monitoring and Sign Off

How will the EQIA be reviewed and monitored, including timescales?	A review of the Healthy School Streets' performance is expected to be undertaken after two years after making them permanent. This EqIA will be reviewed at this stage.		
Equalities advice received from:	<i>Ken Orlukwu</i> <i>Senior Equalities Officer</i>	Date:	20/06/24
EQIA approved by:	Karen Agbabiaka – Director of Streets & Environment	Date:	14/06/24