

## Equality Impact Assessment

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

Name of the proposed change	<b>Introduction of Group 5 Healthy School Streets</b>																				
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>The locations of the schools in Group 5 that have been recommended to take forward to statutory consultation are:</p> <table border="1" data-bbox="674 724 2107 1098"> <thead> <tr> <th data-bbox="674 724 1016 762">Ref</th> <th data-bbox="1016 724 1458 762">School</th> <th data-bbox="1458 724 2107 762">Affected Road(s)</th> </tr> </thead> <tbody> <tr> <td data-bbox="674 762 1016 801">APPLEGARTH/HSS2024</td> <td data-bbox="1016 762 1458 801">Applegarth Primary Academy</td> <td data-bbox="1458 762 2107 801">Bygove</td> </tr> <tr> <td data-bbox="674 801 1016 839">BEULAH/HSS2024</td> <td data-bbox="1016 801 1458 839">Beulah Infant and Nursery School</td> <td data-bbox="1458 801 2107 839">Furze Road</td> </tr> <tr> <td data-bbox="674 839 1016 970">HARRISCPHSS/2023</td> <td data-bbox="1016 839 1458 970">Harris City Academy Crystal Palace<sup>1</sup></td> <td data-bbox="1458 839 2107 970">Sylvan Road (between No. 4 and Maberley Road), Kitley Gardens, Cantley Gardens, Maberley Road (between Mowbray Road and Sylvan Road), Windall Close</td> </tr> <tr> <td data-bbox="674 970 1016 1008">HARRISPW/HSS2024</td> <td data-bbox="1016 970 1458 1008">Harris Primary Academy Purley Way<sup>1</sup></td> <td data-bbox="1458 970 2107 1008">Propeller Crescent</td> </tr> <tr> <td data-bbox="674 1008 1016 1098">ROWDOWN/HSS2024</td> <td data-bbox="1016 1008 1458 1098">Rowdown Primary School</td> <td data-bbox="1458 1008 2107 1098">Calley Down Crescent (between Windham Avenue and Stowell Avenue)</td> </tr> </tbody> </table> <p><sup>1</sup> Harris City Academy Crystal Palace and Harris Primary Academy Purley Way will seek delegated approval to progress to the statutory consultation stage following a further stage of informal consultation</p> <p><sup>2</sup> Rowdown Primary School will seek delegated approval to progress to the statutory consultation stage following further engagement with Callydown Shortbreak Children's Home</p> <p>Following the informal consultation stage, the following Healthy School Streets have not been recommended to be taken forward to statutory consultation:</p>			Ref	School	Affected Road(s)	APPLEGARTH/HSS2024	Applegarth Primary Academy	Bygove	BEULAH/HSS2024	Beulah Infant and Nursery School	Furze Road	HARRISCPHSS/2023	Harris City Academy Crystal Palace <sup>1</sup>	Sylvan Road (between No. 4 and Maberley Road), Kitley Gardens, Cantley Gardens, Maberley Road (between Mowbray Road and Sylvan Road), Windall Close	HARRISPW/HSS2024	Harris Primary Academy Purley Way <sup>1</sup>	Propeller Crescent	ROWDOWN/HSS2024	Rowdown Primary School	Calley Down Crescent (between Windham Avenue and Stowell Avenue)
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Ref	School	Affected Road(s)
JOHNWOOD/HSS2024	John Wood Primary School	Dartnell Road (between Rymer Road and Bredon Road), Jesmond Road (north of Bredon Road), and Laurier Road
RIDDLEDOWN/HSS2024	Riddlesdown Collegiate	Dunmail Drive, Honister Heights, Derwent Drive, Grisedale Gardens, Eskdale Gardens, Ingleboro Drive (east of Buttermere Gardens)
<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<sub>2.5</sub> 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?	New Project	
Who has senior level responsibility for the proposed change?	Nick Hibberd, Corporate Director of Sustainable Communities, Regeneration & Economic Recovery	

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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

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>	<input checked="" type="checkbox"/> Communities <input type="checkbox"/> Employees
Is the impact on equality low, medium or high?	Medium
Summary of EQIA outcome:	<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 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>

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**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"> <li>• 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.</li> <li>• The proportion of residents aged over 60% is 14% in Croydon. One HSS recommended to be made permanent has an equal or higher proportion of over 60s compared to this average:             <ul style="list-style-type: none"> <li>○ Rowdown Primary School – New Addington South Ward – 14%</li> </ul> </li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>
<p>Advancing equality of opportunity</p>	<ul style="list-style-type: none"> <li>• The schemes benefit people of all ages as it encourages travel to and from school in active forms such as walking and cycling.</li> <li>• The Healthy School Street schemes may offer additional space where footways are narrow making areas near the school gates less congested such as near Harris Academy Purley Way on Propeller Crescent</li> <li>• The following HSS provide additional benefits to other establishments within the vicinity where attendees may be brought on foot or by bicycle:             <ul style="list-style-type: none"> <li>○ Rowdown Primary School – Calleydown Shortbreak Children’s Centre</li> </ul> </li> <li>• 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"> <li>○ Applegarth Academy – New Addington North Ward – 18%</li> <li>○ Beulah Infant and Nursery Schools – Thornton Heath Ward – 14%</li> <li>○ Rowdown Primary School – New Addington South Ward – 19%</li> <li>○ Harris Primary Academy Purley Way – Waddon Ward – 15%</li> </ul> </li> </ul>

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	<ul style="list-style-type: none"> <li>○ Harris City Academy Crystal Palace – Crystal Palace &amp; Upper Norwood Ward – 14%</li> <li>● 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.</li> <li>● 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.</li> </ul>
Fostering good relations	<ul style="list-style-type: none"> <li>● 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.</li> <li>● Local disability groups are informed of any changes to the road network</li> <li>● Members of the public and the schools are able to contact the Highways Team on <a href="mailto:healthyschoolstreets@croydon.gov.uk">healthyschoolstreets@croydon.gov.uk</a> to enquire about the schemes or provide feedback on their operation</li> <li>● Officers within the Highways Team are available to meet residents, businesses and schools to discuss any issues with the school streets</li> </ul>
Embedding anti-racism	<ul style="list-style-type: none"> <li>● 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.</li> <li>● Currently, 50.7% of Croydon's population are Black, Asian or Minority Ethnic. These groups are often under-represented in engagements and consultations. Therefore, information prior to making the Healthy School Streets permanent will be shared with local groups for wider dissemination to different communities.</li> </ul>

**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 (.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 a 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 vehicular modes of travel, and consequently would be disadvantaged by the proposals in that they could not drive in the</p>
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	<p>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>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>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 year olds. 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><u>Sources</u></p> <ul style="list-style-type: none"> <li>• Croydon Observatory <a href="http://www.croydonobservatory.org">www.croydonobservatory.org</a></li> <li>• Patterns and trends in child obesity in Croydon; A presentation of 2019/20 NCMP data at local authority level, July 2021</li> <li>• Croydon Health Services NHS Trust</li> <li>• ONS Census 2021</li> </ul>
<p>Consultation</p>	<p>When conducting the statutory consultation, Croydon Council will be writing to all directly affected residents, as well as those living or running businesses within 250m of the extents of the scheme. In addition Croydon will be consulting Age UK Croydon and the Pedestrian Association.</p> <p>Prior to making a decision whether to proceed to statutory consultation for the Rowdown Primary Healthy School Street, officers will meet with Callydown Shortbreak Children’s Home to discuss their operations and assess whether a restricted zone would adversely affect its residents and visitors.</p>

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

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**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 <b>score</b> the <b>likelihood</b> of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group.				<b>1 = Unlikely to impact</b> <b>2 = Likely to impact</b> <b>3 = Certain to impact</b>		
Use the key below to <b>score</b> the <b>severity</b> of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group.				<b>1 = Low</b> <b>2 = Medium</b> <b>3 = High</b>		
The score for likelihood and severity are then multiplied.				<b>e.g. Unlikely to impact =1, Low impact =1, total score =1</b>		
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><b>Positive</b> – the schemes promote active travel and would benefit users of all ages.</p> <p>Riddlesdown Collegiate has not been recommended to take forward to statutory consultation. Not implementing a Healthy School Street here would benefit the school children due to the reported anti-social behaviour in the vicinity, lack of frequent bus services and steep footways.</p> <p>John Wood Primary School has not been recommended to take forward to statutory consultation due to its proximity to another primary school</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>

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				and the potential adverse effect on the local road network, affecting road safety. Not implementing a Healthy School Street here would benefit users of all ages and encourage active travel.  <b>Negative</b> – see next column	
Disability	2	2	4	<b>Positive</b> – the schemes promote active travel and benefit all users, regardless of disability.  John Wood Primary School has not been recommended to take forward to statutory consultation due to its proximity to another primary school and the potential adverse effect on the local road network. Not implementing a Healthy School Street here would benefit users of all abilities and encourage active travel.  <b>Negative</b> – see next column	The Council will inform the public of the potential exemptions they may be able to apply for on our website.  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.
Gender Reassignment	1	1	1	<b>Positive</b> - the schemes promote active travel and benefit all users, regardless of gender identity.	
Marriage or Civil Partnership	1	1	1	<b>Positive</b> - the schemes promote active travel and benefit all users, regardless of marital status.	
Pregnancy and Maternity	2	2	4	<b>Positive</b> - the schemes promote active travel and benefit all users, regardless of pregnancy status.	Potential negative impact on parents during pregnancy from the driving restrictions. As a mitigation measure the council can issue

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					<b>Negative</b> – see next column	temporary exemptions on a case-by-case basis if needed.
	Race	1	1	1	<b>Positive</b> - the schemes promote active travel and benefit all users, regardless of race.  <b>Negative</b> – 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	<b>Positive</b> - the schemes promote active travel and benefit all users, regardless of religious belief	
	Sex	1	1	1	<b>Positive</b> - the schemes promote active travel and benefit all users, regardless of sex.  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	<b>Positive</b> - 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:**

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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. <b>If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.</b>	
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. <b>If you reach this conclusion, ensure you have completed Section 5 above.</b>	X
Continue the proposed change despite potential for adverse impact	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, there are justifiable reasons to continue as planned. <b>If you reach this conclusion, ensure you have completed Section 4 above, clearly setting out your justifications.</b>	
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?	EQIA to be reviewed 12 months after decision is made.		
Equalities advice received from:	Ken Orlukwu, Senior Equalities Officer	Date:	28/06/24
EQIA approved by:	Karen Agbabiaka – Director of Streets & Environment	Date:	28/06/24

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