

Bromley Borough's Third Local Implementation Plan

Draft Initial Equality Impact Assessment

Bromley Council

November 2018

Quality information

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Revision History

Revision	Revision date	Details	Authorized	Name	Position
V1	November 2018	Draft for consultation	5 th November 2018	Nick Chisholm-Batten	Associate

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1. Introduction

Purpose

- 1.1 AECOM has been commissioned by London Borough of Bromley (the Council) to undertake an Equalities Impact Assessment (EqIA) in support of the Bromley Borough's emerging Third Local Implementation Plan. This is to support fulfilment of its Public Sector Equality Duty (PSED) in taking forward the plan.
- 1.2 The Third Local Implementation Plan (LIP3) is a statutory document, prepared under Section 145 of the Greater London Authority Act 1999. This sets out how the Council proposes to implement the Mayor's Transport Strategy (MTS) as well as contributing to other locally and sub-regionally important goals.
- 1.3 It sets out a delivery plan encompassing projects and programmes alongside targets and outcomes that the Council is seeking to achieve. The EqIA is based on the projects and programmes set out within the delivery plan.
- 1.4 An EqIA is an assessment of potential impacts of a scheme on particular communities or Protected Characteristic Groups (PCGs)¹ to ensure that the legal requirements of the PSED are being met.
- 1.5 As a public sector body, the Council is seeking to maximise the benefits associated with the LIP3 and ensure that existing and future communities, including PCGs, within the local area receive equal access to these benefits.
- 1.6 This report provides an overview of the existing baseline conditions with regards to PCGs living in Bromley, as well as the key issues and barriers associated with their use of transport. This initial EqIA presents an early indication of the impacts that the LIP could have on PCGs. The draft LIP3 will be subject to stakeholder and public consultation in November 2018, following which a review of the EqIA will be undertaken to take into account any feedback received relating to PCGs.
- 1.7 The approach undertaken for the EqIA draws on guidance for the appraisal of equality impacts produced by the Equality and Human Rights Commission (EHRC), TfL's Equality Impact Assessments: How to do them guidance² as well as AECOM's in-house approach for conducting Equality Impact Assessments and Equalities Statements.
- 1.8 This initial EqIA will form part of a public consultation process for the draft LIP3 which will engage with members of the public, key stakeholder and representatives of groups with protected characteristics to feed into the assessment and identify any further issues. Any feedback will be incorporated into a final EqIA report based on the final LIP document.

¹ Protected characteristics include age, sex, religion/belief, race, gender reassignment, sexual orientation, pregnancy and maternity, disability and marriage/civil partnership.

² TfL (2004) Equality Impact Assessments: How to do them

2. Policy and Legislation Context

Introduction

- 2.1 This section of the report highlights strategic policy objectives and requirements as they relate to equality legislation and relevant planning policy at the national, regional and local level.

National policy

Equality Act (2010)

- 2.2 The Equality Act 2010³ is the relevant legislation setting out the Public Sector Equality Duty (PSED) to which Bromley Council is subject to in carrying out all its functions, including its consideration of the LIP3. Those subject to the Duty must, in the exercise of their functions, have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
 - Advance equality of opportunity between people who share a protected characteristic and those who do not; and
 - Foster good relations between people who share a relevant protected characteristic and those who do not share it.
- 2.3 These are sometimes referred to as the three aims or arms of the general Duty. The Act explains that having due regard for advancing equality involves:
- Removing or minimising disadvantages suffered by people due to their protected characteristics;
 - Taking steps to meet the needs of people from protected groups where these are different from the needs of other people; and
 - Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.
- 2.4 The Act states that meeting different needs involves taking steps to take account of people's disabilities. It describes fostering good relations as tackling prejudice and promoting understanding between people from different groups, and states that compliance with the Duty may involve treating some people more favourably than others.
- 2.5 The Duty covers the following eight protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 2.6 The PSED requires public bodies to take proactive measures to address inequality and help contribute to the government's commitment to tackle disadvantage and discrimination, advance equality of opportunity, and encourage good relations between all people.
- 2.7 Additionally, where a potential beneficial impact has been found, it has been identified and recommendations made for its enhancement (if appropriate) and where a potential adverse effect has been found, proposed mitigation measures have been identified where possible.

³ Equality Act (2010)

National Planning Policy Framework (2018)

- 2.8 The National Planning Policy Framework (NPPF)⁴ was adopted in July 2018 and consolidates the Government's economic, environmental and social planning policies for England into a single document and describes how it expects these to be applied. The NPPF supersedes the majority of National Planning Policy Guidance and Planning Policy Statements and provides overarching guidance on the Government's development aims.
- 2.9 While the NPPF does not contain specific guidance on equalities, it does emphasise the importance of sustainable development and the need to support a healthy and just society. This is reflected in the key dimensions of sustainable development which relate to the economic, social and environmental roles of the planning system:
- The economic role contributes to building *"a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure"*;
 - The social role supports strong, vibrant and healthy communities by *"providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being"*; and
 - The environmental role contributes to protecting and enhancing the *"natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy"*.
- 2.10 The NPPF identifies key principles that local planning authorities should ensure that they consider, including:
- Local strategies to improve health, social and cultural wellbeing for all;
 - The delivery of sufficient community and cultural facilities and services to meet local needs; and
 - The requirement to plan for the needs of different groups within communities.
- 2.11 In Chapter 8, the NPPF outlines how planning policy should help promote healthy communities by taking a positive and collaborative approach to enable development to be brought forward. The NPPF emphasises that planning policies and decisions should aim to create places which offer: opportunities for social interaction and meetings between members of the community through the delivery of mixed-use developments, strong neighbourhood centres and active street frontages; safe and accessible environments which include social, recreational and cultural facilities and services the community needs; a sufficient choice of school places to meet the needs of existing and new communities; and access to high quality open spaces and opportunities for sport and recreation.

The Inclusive Transport Strategy (2018)

- 2.12 As part of the Government's ambition to build a society that works for all, the Inclusive Transport Strategy: Achieving equal access for disabled people⁵ was published in July 2018 by the Department for Transport (DfT). The DfT's strategy builds on the work of the 2007 consultation on a draft Accessibility Action Plan and sets out the government's actions for achieving equal access to transport for disabled people.

⁴ Equality Act (2010)

⁵ DfT (2018), The Inclusive Transport Strategy: Achieving equal access for disabled people

- 2.13 Chapter 1 of the strategy sets out the Government's ambition for disabled people to have the same accessed to transport as everyone else, and to be able to travel confidently and easily and without extra cost. By 2030 it is envisaged that there will be equal access for disabled people using the transport system, with assistance if physical infrastructure remains a barrier. The aim is to *'see ongoing change in the transport system, both in terms of design, physical access and customer service that gives disabled people the confidence to travel'*.
- 2.14 Chapter 2 sets out the Strategy's five main themes:
- Awareness and enforcement of passenger rights - raising awareness of the obligations on transport operators, the processes for raising concerns or complaints and working with regulators to hold operators to account.
 - Staff training - ensuring that transport staff (frontline and managerial) understand the needs of disabled people with physical, mental, cognitive or sensory impairments, and can provide better assistance.
 - Improving information - ensuring that transport operators provide travel information in formats that all passengers can easily access and understand, before and during a journey.
 - Improving physical infrastructure - ensuring that vehicles, stations and streetscapes are designed, built and operated so that they are easy to use for all.
 - The future of inclusive transport - ensuring that technological advances and new business models provide opportunities for all, and that disabled people are involved from the outset in their design.

Regional policy

The London Plan (2016)

- 2.15 The London Plan⁶ (including minor amendments since 2011) outlines an integrated social, economic and environmental framework for the future development of London to 2036 and contains a number of policies which are broadly relevant to equalities. The Plan has undergone a number of revisions recently including Minor Alterations which were formally adopted in March 2016, and the more considerable changes made within the Further Alterations to the London Plan. These superseded the London Plan 2011 and the Revised Minor Alterations to the London Plan 2013.
- 2.16 The London Plan emphasises the Mayor's and Greater London Authority's (GLA's) PSED responsibility and the need to take account of equalities legislation with regard to all aspects of development. Education and health inequalities are identified as key issues facing many of London's less prosperous communities:
- **Policy 3.1 – 'Ensuring equal life chances for all':** emphasises that "the mayor is committed to ensuring equal life chances for all Londoners. Meeting the needs and expanding opportunities for all Londoners – and where appropriate, addressing the barriers to meeting the needs of particular groups and communities – is key to tackling the huge issue of inequality across London". This is addressed further in the Mayor's equality framework; 'Equal Life Chances for All' (see para. Error! Reference source not found.).
 - **Policy 3.2 – 'Improving Health and Addressing Health Inequalities':** is also relevant, requiring due regard to the impact of development proposals on health inequalities in London;
 - **Housing policies 3.3 – 3.16:** concerning housing provision, affordable housing provision, mixed and balanced communities, housing choice and provision of associated play facilities, are all relevant to equal opportunities.

⁶ GLA, (2016); London Plan (including minor amendments since 2011)

- **Social Infrastructure policies 3.16 – 3.19:** concern the provision of social infrastructure, including health and social care, education, sports and recreation facilities. The policies support the provision of social infrastructure for a growing and diverse population, particularly in areas of under-provision or where there are particular needs.
- **Policy 4.12 – 'Improving Opportunities for all':** requires that strategic development proposals should support local employment skills development and training opportunities. The Plan notes continuing large inequalities in access to jobs and levels of worklessness, with Londoners from BAME groups more than twice as likely to be unemployed as those from White groups.
- **Policy 7.1 – 'Lifetime Neighbourhoods':** enables people to live healthy active lives, and maximises opportunity for community diversity and inclusion, and the design of places that meet the needs of the community at all stages of people's lives. Policy 7.1 states that "ensuring that families with small children, older people and disabled people can easily move around, enables everyone to participate in, and contribute to, the life of the community."
- **Policy 7.2 – 'An inclusive environment':** seeks to achieve the highest standards of accessible and inclusive design and supports principles of inclusive design by ensuring developments:
 - *"Can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances;*
 - *Are convenient and welcoming with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment;*
 - *Are flexible and responsive taking account of what different people say they need and want, so people can use them in different ways; and*
 - *Are realistic, offering more than one solution to help balance everyone's needs, recognising that one solution may not work for all."*

The London Plan: Draft for Public Consultation (2017)

2.17 In December 2017, the Mayor of London published 'The London Plan: Draft for Public Consultation'⁷ which, once consulted upon and adopted, will replace The London Plan 2016⁸. The Plan is intended to *"represent a step-change in approach and serves as a blueprint for the future development and sustainable, inclusive growth of our city"*. Policies relevant to this EqIA include:

- **Policy GG1 – 'Building strong and inclusive communities':** seeks to build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities. Policy GG1 sets that those involved in planning and development must:
 - *"Seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer and more equal city;*
 - *Provide access to good quality services and amenities that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation;*
 - *Ensure that streets and public spaces are planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging and community ownership, and where communities can develop and flourish;*

⁷ GLA, (2017); The London Plan: Draft for Public Consultation

- *Promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for face-to-face contact and social interaction during the daytime, evening and night time;*
 - *Ensure that new buildings and the spaces they create are designed to reinforce or enhance the legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements;*
 - *Support the creation of a London where all Londoners, including older people, disabled people and people with young children can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation."*
- **Policy E11 – 'Skills and opportunities for all'**: states that development proposals should seek to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate.
 - **Policy H5 – 'Delivering affordable housing'**: sets the strategic target whereby 50% of all new homes delivered across London will be affordable. Affordable housing should be provided on development sites in order to "deliver communities which are inclusive and mixed by tenure and household income, providing choice to a range of Londoners."
 - **Policy T3 – 'Transport capacity, connectivity and safeguarding'**: refers to the fact that development proposals should support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed.
 - **Policy T6 Car parking**: States that appropriate disabled persons parking for Blue Badge holders should be provided for new developments. Disabled persons parking bays should be located on firm and level ground, as close as possible to the building entrance or facility they are associated with.

Mayor's Transport Strategy (2018)

- 2.18 The Mayor's Transport Strategy⁹, published in March 2018, sets out the Mayor's policies and proposals to reshape transport in London over the next two decades. The strategy emphasises the role of transport as a cornerstone for a fairer, greener, healthier and more prosperous city which delivers good growth.
- 2.19 At the heart of the Mayor's Transport Strategy is the Healthy Streets approach which provides the framework for putting human health and experience at the heart of planning the city. The framework uses ten healthy streets indicators, which have relevance to different groups, to assess the experience of being on London's streets. Significant improvements to public transport services and a more joined-up approach to planning transport services and housing will be required to achieve the reduction in car dependency, encourage active, efficient and sustainable travel patterns. The Strategy prioritises the movement of people over cars and promotes walking and cycling as the default choice for shorter trips and public transport for longer ones.
- 2.20 The following policies are relevant to this EqIA:
- **Policy 10 – 'Whole journey approach'**: sets the healthy streets approach will be used to deliver co-ordinated improvements to public transport and streets to provide an attractive journey experience that will facilitate mode shift away from the car.

⁹ GLA, (2018); Mayor's Transport Strategy

- **Policy 12- 'Affordability':** concerns public transport fare levels and ensures that these are set to enable access to affordable travel for all Londoners.
- **Policy 14 – 'Accessibility':** seeks to enhance London's streets and public transport network to enable disabled and older people to more easily travel spontaneously and independently, making the transport system navigable and accessible to all and reducing the additional journey time that disabled and older users can experience.
- **Policy 21 – 'Good Growth':** ensures that new homes and jobs in London are delivered in line with the transport principles of Good Growth for current and future Londoners by using transport to create high-density, mixed-use places, and unlock growth potential in underdeveloped parts of the city.
- **Policy 23 – 'New Transport Services':** sets that new services should be accessible to all Londoners and should not contribute to the creation of social, economic or digital divides in which some Londoners would have better travel options than others.

Mayor's Equality, Diversity and Inclusion Strategy (2018)

- 2.21 In May 2018, the Mayor's Equality, Diversity and Inclusion Strategy¹⁰ (EDIS) was published. The strategy sets out how inequalities, barriers and discrimination experienced by groups protected by the Equality Act will be addressed by tackling issues such as poverty and socio-economic inequality, as well as the challenges and disadvantage facing PCGs. The strategy sets out 33 equality, diversity and inclusion objectives towards making London *"a fairer, more equal, integrated city where all people feel welcome and able to fulfil their potential"*.
- 2.22 **Chapter 4 – 'Getting around'** is particularly relevant to this initial EqlA as it recognises how traffic dominance, affordability, safety and accessibility issues can prevent some people from going out to enjoy their city, getting to work, or engaging with their communities, which can have a profound impact on their health and wellbeing. Chapter 4 includes the following Strategic Objectives:
- **Strategic Objective 23 – 'Inclusive, accessible streets':** In line with the Mayor's Transport Strategy and the Healthy Streets approach, Strategic Objective 23 seeks to address barriers to walking and cycling by making sure planned development incorporates accessibility and inclusion issues in particular.
 - **Strategic Objective 24 – 'Affordable transport':** outlines the Mayor's determination to keep Londoners' transport costs as low as possible. Strategic Objective 24 seeks to offer more affordable transport and make people more aware of the cheapest travel options on offer.
 - **Strategic Objectives 25 and 26 – 'An inclusive transport network':** seek to explore opportunities that promote inclusive, accessible design in developments. Increasing staff awareness and understanding of how to offer an inclusive service, including providing disability equality training is key to ensuring an inclusive transport network.
 - **Strategic Objective 27 – 'Safer journeys':** seeks a collaborative approach towards reducing crime and the fear of crime on London's streets and transport system.

Equal Life Chances for All (2014)

- 2.23 The GLA's Equality Framework¹¹ sets out the Mayor's commitment to tackling inequality, improving life chances, and removing barriers that prevent people from reaching their full potential in London. The Framework identifies 22 key equality objectives relating to health; education, employment, pay and skills; housing; safety; violence; transport and community engagement. The Framework also includes some specific objectives for organisations such as the Metropolitan Police, the GLA, and Transport for London.

¹⁰ GLA (2018); Mayor's Equality, Diversity and Inclusion Strategy

¹¹ GLA, (2014); Equal Life Chances for All

Local policy

Bromley Local Plan

2.24 The emerging Bromley Local Plan¹² seeks to deliver new housing, employment and infrastructure in the London borough, and identifies a policy framework to guide future development. In this respect the policies relevant to this EqlA are:

- **Policy 2: Provision of Affordable Housing-** In order to meet the needs of the Borough, affordable housing will be sought on all housing developments capable of providing 11 residential units or more or where the residential floorspace is more than 100sqm, irrespective of the number of dwellings.
- **Policy 4: Housing Design-** All new housing developments will need to achieve a high standard of design and layout whilst enhancing the quality of local places. Housing schemes will also need to respect local character, spatial standards, physical context and density.
- **Policy 20: Community Facilities-** The Council will promote the quality of life and the health and wellbeing of those living and working in the Borough and engage with providers and agencies to ensure the provision, enhancement and retention of a wide range of appropriate social infrastructure, including facilities for health and education; recreation, sports and play facilities, places of worship and venues for cultural and social activities, as well as the provision of community safety infrastructure such as police facilities, ambulance and fire stations.
- **Policy 21: Opportunities for Community Facilities-** The Council will support the maximisation of opportunities for the enhancement or the creation of social infrastructure, to address the needs of existing and future residents of all ages, particularly in renewal areas and more accessible locations such as retail centres and existing retail frontages.
- **Policy 26: Health & Wellbeing-** The Council will work proactively with health professionals and relevant bodies to improve the physical and mental health of the Borough's residents and reduce health inequalities by taking account of, and supporting local strategies for health and wellbeing and by delivering quality, healthy environments, infrastructure and accessible health facilities to meet the needs of the community.
- **Policy 27: Education-** The Council is committed to choice in education for parents and young people and will work, in partnership with agencies and providers, to ensure the provision of an appropriate range of educational facilities to cater for lifelong learning across the spectrum from early years to further and higher education, and including specialist provision.
- **Policy 28: Educational Facilities-** The Council will support proposals for new educational facilities which meet local need, looking first at opportunities to maximise the use of existing Education Land or redundant social infrastructure.
- **Policy 30: Parking-** Developments must provide designated blue badge parking.
- **Policy 31: Relieving Congestion-** Any new development likely to be a significant generator of travel should be located in positions accessible or capable of being made accessible by a range of transport modes, including public transport, walking and cycling.
- **Policy 32: Road Safety-** The Council will consider the potential impact of any development on road safety and will ensure that it is not significantly adversely affected.
- **Policy 33: Access for All-** The Council will require that proposals are designed to ensure ease of access and movement for people with disabilities, both physical and sensory. The Council will also consider the potential impacts on people with disabilities, and pedestrians and will

¹² London Borough of Bromley (2016) Proposed Submission Draft Local Plan [online] available at: https://www.bromley.gov.uk/downloads/file/3384/sd1_proposed_submission_draft_local_plan_november_2016 [accessed 31/08/18]

seek provision of crossing facilities, designated routes and other improvements to the pedestrian environment as appropriate.

- **Policy 35: Transport Investment Priorities-** The Council will work with and lobby partner agencies including Transport for London (TfL), Network Rail, and Department for Transport (DfT) to secure investment in transport infrastructure for the benefits of the Borough, such as increasing capacity, reducing congestion, and making improvements to public transport.

3. Equalities baseline

Introduction

- 3.1 This section provides an overview of the study area with regards to equalities. It includes a baseline profile, drawing on a range of relevant data from the 2011 Census, the Index of Multiple Deprivation (IMD) 2015 and additional sources including the ONS Integrated Household Survey and Metropolitan Police. The baseline provides a demographic profile of the London borough of Bromley, including the proportion of residents sharing protected characteristics. To provide context for comparison purposes, data for London is also presented, as well as regional data for the South East. Figures supporting the statistics can be found in Appendix A showing data at the Lower Super Output Area (LSOA) level.
- 3.2 The Equalities baseline also draws on an evidence base pertinent to the EqlA regarding issues identified as likely to affect PCGs including the Travel in London: Understanding our diverse communities¹³ document published by TfL in 2015. The document sets out a collection of research on travel behaviours of PCGs and flags up equality issues and barriers experienced by PCGs when accessing public transport in particular.

The study area

Overview

- 3.3 The study area for the initial EqlA encompasses the London borough of Bromley. The borough of Bromley has rural characteristics including open countryside which is protected by the Green Belt that encircles London and makes up over 50% of the borough. Although a large proportion of the local population travel to central London to work, Bromley has a strong local economy from employment opportunities in the town centre, the Cray Business Corridor, Biggin Hill Airport and other local industrial areas.

Transport

- 3.4 There are 26 railway connections within the borough providing links to central London and Kent. There are trams running in the west of the borough which link to Croydon and Wimbledon. Bromley also has easy access to the M25 with easy access to the M25 which links onwards to the national road network and major airports. Public Transport Accessibility Levels (PTALS) are measures of the accessibility of various points to the public transport network which take into account walk access time and service availability at any location within Greater London¹⁴. PTALS maps areas with the highest scoring areas at level 6 and the lowest scoring levels at 0. Although Bromley town centre and Orpington have high PTALS, the majority of Bromley has lower PTALS (including some areas with a score of '0') as shown in Figure A-1 (Appendix A).

Key attractors in the area

- 3.5 Healthcare facilities within the study area are shown in Figure A-2. Within Bromley, there are 40 GP practices. There are also 6 hospitals including Priory Hospital Hayes Grove (treating mental health and addictions), Princess Royal University and BMI the Sloane Hospital. There is also

¹³ TfL (2015) Travel in London: Understanding our diverse communities [online] available at: < <http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities.pdf> > [last accessed 17/09/18]

¹⁴ TfL (2010) Measuring Public Transport Accessibility Levels [online] available at: <https://files.datapress.com/london/dataset/public-transport-accessibility-levels/PTAL-methodology.pdf> [accessed 17/09/2018]

Lauriston House which is a nursing care home that takes on a number of personal care needs such as rehabilitation as well as being a home for young people with disabilities.

- 3.6 Primary and secondary schools in the area are shown in Figure A-3. The area is also home to Bromley College of Further & Higher Education which is the largest campus of the London South East Colleges campuses. Capel Manor College which provides courses in animal care and arboriculture also has a campus at Crystal Palace Park Centre in Bromley. Nash College of Further Education in the west of the borough provides education for young people with physical and learning difficulties. Other colleges in the area include Bromley Adult Education College and Ravensbourne.
- 3.7 Community centres are likely to be frequented by people belonging to certain PCGs, and provide important resources for older people, children and young people, mothers with babies, and black, Asian and minority ethnic (BAME) people. They provide meeting places for classes, social events, drop-in centres, learning facilities, and other community events, which people sharing protected characteristics may access more frequently than those people who do not belong to PCGs.
- 3.8 Cotmandene Community Resource Centre and Mottingham Community and Learning Shop in Bromley encourages and supports local residents of the borough to improve their quality of life and to build better futures. In addition to these, there are 60 community halls which people belonging to certain PCGs are likely to use. Age UK has a centre at the Garden Rooms in Chislehurst which provides advice and support for people aged 50+. There is also a JobCentre Plus towards the town centre.
- 3.9 The area is home to a number of places of worship and religious centres including Penge Mosque & Islamic Centre, Al-Emaan Centre, Nurani Cultural Centre and Bromley Reform Synagogue.

Profile of protected characteristic groups

Population

- 3.10 In 2017, the population of Bromley was estimated to be 327,900.¹⁵

Age

- 3.11 The research presented in this EqlA considers a range of age groups including children, younger people (aged 16-24 years old) and older people (65-84 and 85+ plus years old). Table 5-1 and Figure 5-1 provide a breakdown of ages for Bromley compared with London, the South East and England according to the last Census (2011)¹⁶.

Table 3-1: Population Age Profile

Age Group	Bromley	London	South East	England
Children (aged 0-15 years old)	19.6%	19.9%	19.0%	18.9%
Younger People (aged 16-24 years old)	9.8%	12.3%	11.2%	11.9%
Older People (aged 65+ years old)	16.8%	11.0%	17.2%	16.3%

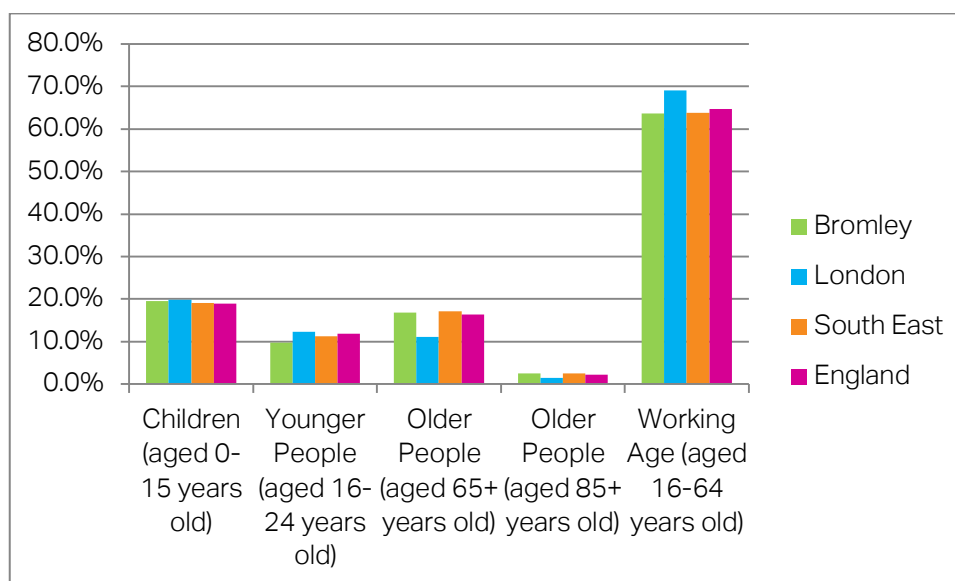
¹⁵ Mayor of London (2018) Bromley [online] available at < <https://data.london.gov.uk/dataset/london-borough-profiles> > [accessed 13/09/18].

¹⁶ ONS (2011); Census

65+years old)				
Older People (aged 85+ years old)	2.5%	1.5%	2.5%	2.2%
Working Age (aged 16-64 years old)	63.6%	69.1%	63.8%	64.8%
All Ages	309,392	8,173,941	8,634,750	53,012,456

Source: ONS (2011) Census

Figure 3-1: Proportion of the population in the PCGs by age and Geography



- 3.12 Generally, the proportion of residents within each age category in Bromley aligns with the proportions in the South East of England and England. The proportion of younger people in Bromley (9.8%) is slightly lower than the proportion of London (12.3%), the South East (11.2%) and England (11.9%). Figure A-6 (Appendix A) shows the numbers of people aged under 25 by LSOA in the study area. There are pockets of high numbers of young people living in parts of West Wickham as well as Orpington.
- 3.13 There is a greater proportion of older people in Bromley (aged 65+ years and 85+) compared to London, the South East and England. Figure A-7 (Appendix A) shows that areas within the south east of the borough have higher numbers of people over 65, as well as some areas around Petts Wood. Figure A-8 show that areas north of Petts Wood have higher numbers of people over 85.

Issues relating to transport

- 3.14 The draft LIP notes that 11-20 year olds account for 23% of LB Bromley's KSIs (Killed and Seriously Injured) casualties with regards to road accidents.
- 3.15 Research shows that children are more vulnerable to the effects of traffic noise than the population overall and exposure at home may result in more adverse impacts than exposure at school¹⁷. Children spend more time at home than at school and night-time exposure can be associated with sleep disturbance, with regard to both quality and quantity. In children sleep disturbance and sleep problems may affect behaviour. Evidence¹⁸ shows that children are also particularly vulnerable to poor air quality compared to the population overall and older people and people with respiratory diseases are also more likely to be affected by changes in air quality.

¹⁷ Hjortebjerg D et al (2015) Exposure to Road Traffic Noise and Behavioral Problems in 7-Year-Old Children: A Cohort Study in Environ Health Perspect. Feb 2016

¹⁸ Department for Transport TAG unit A4.2 Distributional Impact Appraisal January 2014

- 3.16 The Borough on average has lower levels of childhood obesity than the London average with 7.8 % of children in reception obese compared to a London average of 10.8% and 16.2 % of children in year 6 compared to a London average of 22.5 %. There are however particular challenges in Plaistow and Sundridge, Orpington, Penge and Cator, Cray Valley East, Cray Valley West, Crystal Palace and Clockhouse wards where obesity levels are higher than the Borough average.
- 3.17 According to findings presented in the Travel in London: understanding our diverse communities document, Londoners under the age of 25 are more likely to be from a BAME group and in education and less likely to be in full or part-time employment than all Londoners. In terms of travel barriers, younger people under the age of 25 cite overcrowding, slow journey times and cost as the main barriers to greater public transport use¹³.
- 3.18 With the exception of travelling by bus, older people use public transport less frequently than Londoners overall. Overcrowding and concerns around antisocial behaviour are the most commonly mentioned barriers to increased public transport by older people.
- 3.19 Research suggests that older people face physical barriers (including long distances to connection points, presence of steps, speed of closing doors and jerky movements), emotional barriers (including overcrowding, disruptive passengers, and fear of crime), and information barriers (such as reduced expectations and unawareness of supported travel options)¹³.
- 3.20 Older people may be more vulnerable to traffic noise exposure due to spending more time at home than the population overall. Although the distributional impact assessment provides a neutral assessment for community receptors associated with older people and schools, the noise effects of the scheme may have a differential impact on younger and older residents living near the proposed scheme.
- 3.21 With higher life expectancy resulting in an ageing population, there is need to assess the requirements and demand for services targeted at older people.

Sex

- 3.22 Table 5-2 presents the number and percentage of males and females in Bromley, London, the South East and England. Within Bromley, there are slightly higher proportions of women than men. This is in line with the proportions of men and women in London, the South East and England.

Table 3-2: Population breakdown by Sex and Geography

Age Group	Bromley	London	South East	England
	%	%	%	%
Male	48.0%	49.3%	49.1%	49.2%
Female	52.0%	50.7%	50.9%	50.8%

Issues relating to transport

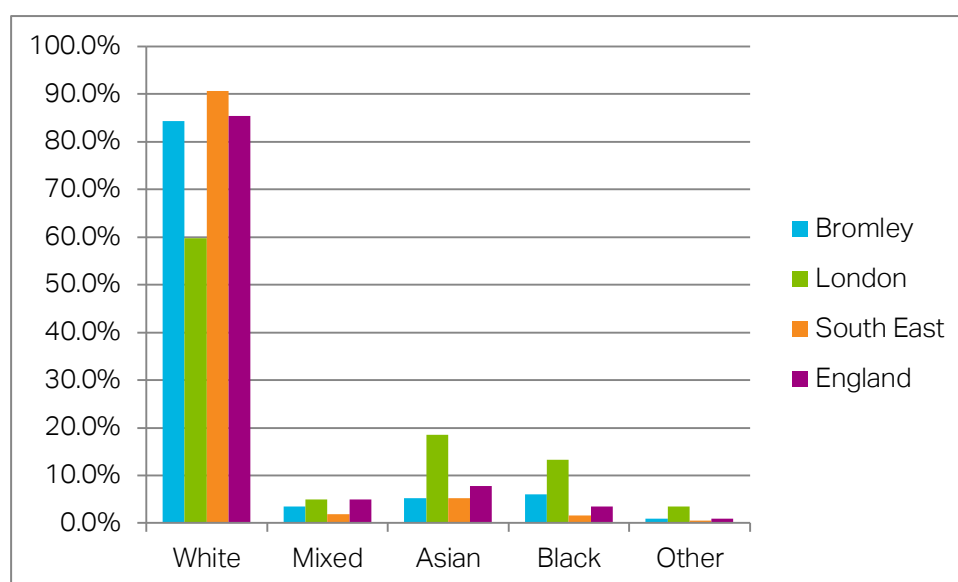
- 3.23 Women are more likely to use buses and less likely to use other types of transport than men¹³. However women are more likely to face barriers around fear of crime and take precautions against crime when using public transport which influences their frequency of public transport use. Therefore, safety and security and affordability are key factors that determining women's' use of public transport.

- 3.24 Research suggests that male drivers, particularly younger males, are more commonly involved in road accidents^{19/20} and as such improvements in road safety could have a differential impact on this group.

Race

- 3.25 Figure 3- presents the breakdown of ethnicity by geography. The proportion of white people living in Bromley (84.3%) is higher than the proportion of white people living in London (59.8%), but less than the South East (1.9%) and England (85.4%).
- 3.26 According to Census 2011 data, the proportion of the population of Black, Asian and Minority Ethnic (BAME) origin is higher in Bromley (15.6%) than in the South East (9.3%), but lower than England (17.3%). The proportion of the population of BAME origin is significantly higher in London (40.2%) than in Bromley
- 3.27 As presented in Figure 3-2, the largest ethnic minority group in Bromley is Black. 6.0% of the population in Bromley are Black/African/Caribbean/Black British.

Figure 3-2: Ethnicity by Geography



Issues relating to transport

- 3.28 BAME Londoners are more reliant on public transport as the use of cars among BAME Londoners is lower than for white Londoners.
- 3.29 Driving a car is higher among people of Asian origin than other BAME groups. Compared to White Londoners, BAME groups are more likely to mention a larger number of potential barriers that prevent them from increasing use of public transport.
- 3.30 Cost of transport, overcrowding, slow journey times, unreliable services, and concern about antisocial behaviour are the most commonly mentioned barriers by BAME groups in London¹³.

¹⁹ Moller, M. (2004) 'An explorative study of the relationship between lifestyle and driving behaviour among young drivers', Accident Analysis & Prevention, 36(6): 1081-1088.

²⁰ Clarke, D., Ward, P. and Truman, W. (2005) 'Voluntary risk taking and skill deficits in young driver accidents in the UK', Accident Analysis and Prevention, 37, 523-529.

Religion or belief

- 3.31 The proportion of the population within Bromley that identify as Christian (60.6%) is greater than London (48.4%) and slightly greater than the South East (59.8%) and England (59.4%). The proportion of the population identified as Hindu in Bromley (1.6%) is slightly greater than the proportion identified as Hindu in the South East (1.1%) and England (1.5%) but less than London (5.0%). The proportion of all other religions are broadly similar across the South East and England, but less than in London as outlined in Table 3-3. The proportion of people who identified as having 'No religion' is greater in Bromley (26%) compared to London (20.7%)

Table 3-3: Religion/belief by Geography

Religion	Bromley	London	South East	England
Christian	60.6%	48.4%	59.8%	59.4%
Buddhist	0.5%	1.0%	0.5%	0.5%
Hindu	1.6%	5.0%	1.1%	1.5%
Jewish	0.3%	1.8%	0.2%	0.5%
Muslim	2.5%	12.4%	2.3%	5.0%
Sikh	0.2%	1.5%	0.6%	0.8%
Other religion	0.4%	0.6%	0.5%	0.4%
No religion	26.0%	20.7%	27.7%	24.7%
Religion not stated	7.8%	8.5%	7.4%	7.2%

Source: ONS; 2011 Census

Issues relating to transport

- 3.32 People from certain religious groups may feel more vulnerable than others when using public transport due to fear of being harassed. The British Transport Police recorded an increase in religious hate crime incidents across London Underground, from 51 in 2015 to 110 in 2017²¹.

Disability

- 3.33 The total proportion of residents within Bromley who report that their activities are limited 'a little' is less than London, the regional and national totals shown in Table 5-4. There are also slightly fewer residents within Bromley who report that their activities are limited 'a lot' (6.3%) in comparison to London (6.7%), the South East of England (6.9%) and England (8.3%). Overall, 85.0% of residents in Bromley report that their activities are 'not limited', slightly greater than the totals for the South East of England (84.3%) and England (82.4%) but slightly less than London (85.8%).
- 3.34 Figure A-9 (appendix A shows the highest numbers of people with a long term limiting illness living in areas of Rosehill, Colliers Wood, North Wimbledon and Mitcham.

Table 3-4 Limiting long term illness or disability by Geography

	Bromley	London	South East	England
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²¹ British Transport Police (2017) Freedom of Information request 1428-17 Race and Religion Hate Crimes London Underground 2015 to Dec 2017 [online] available to download from: <
http://www.btp.police.uk/about_us/your_right_to_information/publication_scheme/disclosure_log/crime_statistics.aspx> [last accessed 18/09/18]

	Bromley	London	South East	England
Activities limited 'a lot'	6.3%	6.7%	6.9%	8.3%
Activities limited 'a little'	3.7%	7.4%	8.8%	9.3%
Activities 'not limited'	85.0%	85.8%	84.3%	82.4%

Issues relating to transport

- 3.35 According to evidence presented in the Travel in London: Understanding our diverse communities document¹³ people with a disability report that their disability limits their ability to travel resulting in them to travel less often than non-disabled people.
- 3.36 Walking, using buses, and being passengers in cars are the most commonly used types of transport by individuals with a disability. There are several barriers that individuals with a disability face which contribute to the stressful experience of using public transport including accessibility-related issues, costs, overcrowding and safety¹³.

Gender reassignment

- 3.37 There are no official statistics relating to gender reassignment and the UK Census currently only collects data relating to sex (gender assigned at birth). The Office for National Statistics (ONS) has identified a need for information about gender identity for policy development and service planning with these requirements strengthened by the need for information on those with the protected characteristic of gender reassignment as set out in the Equality Act 2010. Work is currently being undertaken to identify the ways of capturing this information within the 2021 Census.
- 3.38 Transgender people may have concerns about safety and security when using public transport and reports from British Transport Police highlight a rise in hate crimes against this group in 2017. Transgender people may also avoid associated public transport facilities such as toilets for fear of being harassed or identified²².

Sexual orientation

- 3.39 The ONS Integrated Household Survey recently introduced questions on sexual orientation²³. Data from the 2014 survey (the most recently available data on sexual orientation at the time of writing) indicates that 1.1% of UK residents identified themselves as Gay or Lesbian; 0.5% as Bisexual; 98.1% as Heterosexual or straight; and 0.3% as an 'other' sexual identity.
- 3.40 London and the South East have the largest proportion of adults identifying as LGB (2.6% and 1.8% respectively). Estimates relating to numbers of people identifying with a specific sexual orientation are not available at borough level or below, due to the small sample size of this dataset²³.

²² EHRC (2015) Is Britain Fairer?: Key Facts and Findings on Transgender People [online] available at: https://www.equalityhumanrights.com/sites/default/files/key_facts_and_findings-transgender_0.pdf [last accessed 18/09/18]

²³ ONS, (2015); Integrated Household Survey, January to December 2014: Experimental Statistics [online] available at: http://webarchive.nationalarchives.gov.uk/20160105160709/http://www.ons.gov.uk/ons/dcp171778_418136.pdf [last accessed 18/09/18]

Socio-economic status

Deprivation

- 3.41 The extent of deprivation is measured by the 2015 English Indices of Deprivation.²⁴ It provides an overall deprivation score for Lower Super Output Areas (LSOAs) across England by building upon a series of domains and sub-domains. These domains include indicators such as health, income, employment, education, exposure to crime, barriers to housing and services, and living environment; and are seen as the key indicators which influence a person's level of deprivation.
- 3.42 These statistics provide a measure of 'relative deprivation', not affluence. As such, it is important to recognise that not every person in a highly deprived area will consider themselves to be deprived and likewise, that there will be some deprived people living in the least deprived areas²³.
- 3.43 People belonging to PCGs are more likely to experience deprivation, as they may experience poor health, have lower levels of income (e.g. if they are unable to work full time), or experience barriers to accessible housing, and access to services. This can lead to poor health and wellbeing outcomes, and detrimentally affect the equality of opportunity a person experiences. Women, disabled people, individuals of BAME origin and older people are more likely to live in low income households than others.
- 3.44 According to the English Indices of Deprivation, in 2015, Bromley was the 208th most deprived local authority in England (of a total of 326 districts, where 1 is the most deprived), and the 28th most deprived of the 33 in the London region. 16.2% of LSOAs in Bromley are in the top 30% most deprived parts of the country.
- 3.45 Figure A-10 (Appendix A) maps the Index of Multiple Deprivation (IMD) across the LSOAs in Bromley. This shows that more deprived areas are found around the edge of the borough, particularly around Orpington and Upper Norwood.

Housing

- 3.46 The 'health deprivation & disability' domain measures the risk of premature death and the impairment of quality of life through poor physical or mental health. The domain measures morbidity, disability and premature mortality but not aspects of behaviour or environment that may be predictive of future health deprivation. According to the health deprivation and disability domain, 5.1% of LSOAs in Bromley are in the top 30% most deprived parts of the country according to the health deprivation and disability domain²³.
- 3.47 The populations of Bromley suffer relatively more geographical barriers than populations across Outer London and Greater London. The rate of LSOAs in the top 30% most deprived according to geographical barriers in Bromley (23.3%) are significantly higher than the equivalent rates across Outer London (9.3%). However, the rate of LSOAs in the top 30% most deprived according to wider barriers in Bromley (60.6%) is lower than the equivalent rates across Outer London (80.6%) and Greater London (85.8%).

Health inequalities

- 3.48 The 'health deprivation & disability' domain measures the risk of premature death and the impairment of quality of life through poor physical or mental health. The domain measures morbidity, disability and premature mortality but not aspects of behaviour or environment that may be predictive of future health deprivation. According to the health deprivation and disability domain, 5.2% of LSOAs in Bromley are in the top 30% most deprived parts of the country according to the health deprivation and disability domain²³.

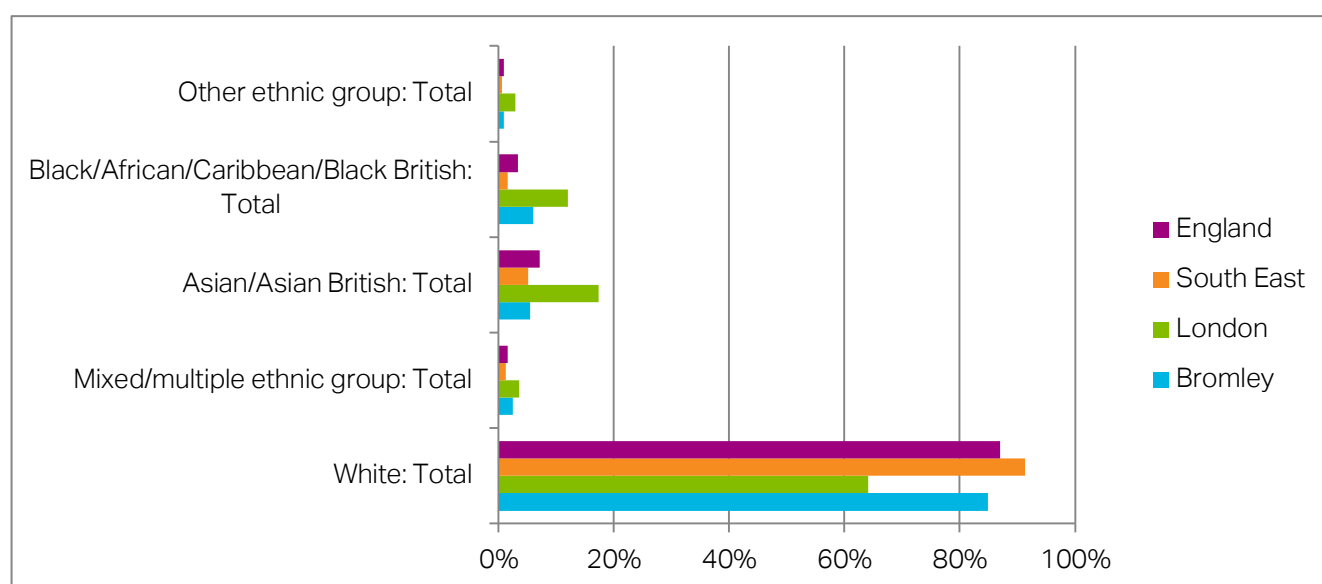
²⁴ The English Indices of Deprivation 2015 Statistical Release

- 3.49 There is a tendency for people belonging to PCGs, particularly young people, older people, disabled people, and BAME people, to experience poorer health and require more frequent access to healthcare than others.
- 3.50 84.2% of residents in Bromley consider themselves as having 'very good health' or 'good health', broadly aligning to the totals for London (83.8%), the South East of England (83.7%), but slightly higher than the total for England (81.4%). Similarly, the percentage of residents in Bromley considering themselves to have 'bad health' or 'very bad health' is 4.1%, similar to the total for the South East (4.3%), but lower than the total for London (5.0%) England (5.4%).

Employment and the economy

- 3.51 The employment deprivation domain measures the proportion of the working age population in an area involuntarily excluded from the labour market. This includes people who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities. The population of Bromley suffers relatively less labour market exclusion than across Outer London and Greater London. The rate of LSOAs in the top 30% most deprived according to employment in Bromley (12.9%) are significantly lower than the equivalent rate across Outer London (22.3%) and London as a whole (28.2%).
- 3.52 Figure 5-4 presents the rates of economic activity by ethnicity by each study area. This **Error! Reference source not found.** shows that in all areas, white residents have the highest rates of economic activity rates.

Figure 5-4: Economic Activity by Ethnicity by Geography



Source: ONS Census (2011)

Education

- 3.53 Bromley has a comparatively low percentage of residents with a level 4 qualification and above (33.1%) compared to London (37.7%). However this is a higher percentage than the South East (29.9%) and England (27.4%). This is presented in Table 5-5 below.

Table 3-5: Qualifications by Geography

Qualification Level	Bromley (%)	London (%)	South East (%)	England (%)
No Qualifications	17.9	17.6	19.0	22.5

Qualification Level	Bromley (%)	London (%)	South East (%)	England (%)
Highest level of qualification: Level 1 qualifications	13.6	10.7	13.5	13.3
Highest level of qualification: Level 2 qualifications	16.0	11.8	15.9	15.2
Highest level of qualification: Apprenticeship	2.7	1.6	3.6	3.6
Highest level of qualification: Level 3 qualifications	11.5	10.5	12.8	12.4
Highest level of qualification: Level 4 qualifications and above	33.1	37.7	29.9	27.4
Highest level of qualification: Other qualifications	5.1	10.0	5.2	5.7

Source: ONS Census (2011)

- 3.54 A-11 (Appendix A) shows the proportion of residents with NVQ4+ qualifications at LSOA level. Lower proportions of people with NVQ4+ qualifications are around Orpington in comparison to areas to the north west of the borough which have very high percentages of residents with NVQ4+.

4. Initial assessment of impacts

Approach

- 4.1 A high level assessment of equality impacts has been undertaken and considers information gathered through the above activities as well identification of key equality issues relevant to the PCGs with regards to the plans and programmes within the draft LIP3.
- 4.2 A judgment has been made as to how each of the proposals would contribute to the realisation of the equality effects for groups with protected characteristics as defined in the Equality Act 2010 as:
- i. **Age:** this refers to persons defined by either a particular age or a range of ages;
 - ii. **Disability:** a disabled person is defined as someone who has a physical or mental impairment that has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities;
 - iii. **Pregnancy and maternity:** pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth;
 - iv. **Race:** the Equality Act 2010 defines race as encompassing colour, nationality (including citizenship) and ethnic or national origins;
 - v. **Sex:** this refers to a man or to a woman or a group of people of the same sex, while gender refers to the wider social roles and relationships that structure men's and women's, boys' and girls' lives;
 - vi. **Religion or belief:** religion means any religion a person follows. Belief means any religious or philosophical belief, and includes those people who have no formal religion or belief;
 - vii. **Sexual orientation:** a person's sexual orientation relates to their emotional, physical and/or sexual attraction and the expression of that attraction.
 - viii. **Gender reassignment:** this refers to people who are proposing to undergo, are undergoing, or have undergone a process for the purpose of reassigning their gender identity;
 - ix. **Marriage and civil partnership:** marriage can be between a man and a woman or between two people of the same sex. Same-sex couples can also have a civil partnership. Civil partners must not be treated less favourably than married couples. (It is not considered that this PCG is relevant for this EqlA and has therefore not been included in the baseline or assessment)
- 4.3 The assessment considers both disproportionate and differential impacts. A disproportionate effect arises when an impact has a proportionately greater effect on protected characteristic groups than on other members of the general population at a particular location. For the purposes of this EqlA, disproportionality can arise in two main ways, either:
- an impact is predicted for the area where protected characteristic groups are known to make up a greater proportion of the affected resident population than their overall representation in the Borough/ Greater London or national level; or
 - Where an impact is predicted in an area predominantly or heavily used by protected characteristic groups (e.g. primary schools attended by children; care homes catering for very elderly people).
- 4.4 A differential equality effect is one which affects members of a protected characteristic group differently from the rest of the general population due to a specific need, or a recognised

sensitivity or vulnerability associated with their protected characteristic, regardless of the number of people affected.

- 4.5 In some cases, protected characteristic groups could be subject to both disproportionate and differential equality effects. The EqlA will consider impacts on groups of people rather than on individuals. Justifications for each assessment will be provided as well as further recommendations where appropriate.
- 4.6 The initial assessment of equalities impacts has examined each of the projects and programmes outlined in the draft LIP to identify potential effects for each of the PCGs. The assessment considers whether or not each project has potential to *differentially* or *disproportionately* impact on each of the groups with protected characteristics. To clarify, the assessment will only identify a positive or negative impact where:
- The impact is expected to be greater for the assessed group than for the population of Bromley as a whole; or
 - Where it affects an equality group differently from the rest of the general population because of specific needs or a recognised vulnerability.

Assessment

- 4.7 Table 6.1 outlines the scoring used for the screening assessment and Table 6.2 contains the outcomes of the initial equalities assessment for each of the LIP projects and programmes.

Table 4-1 Scoring assessment for EqlA

Potential differential impacts	Scoring
Positive	+
Negative	-
Positive and/or negative	+/-
Neutral (i.e. impacts are no greater than those experienced by the population as a whole)	0

Table 4-2 Initial assessment of equality impacts – Draft LIP (November 2018)

LIP Projects	Age	Sex	Ethnicity	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Justifications/ Recommendations
Network reliability									
A224 Spur Road to Carlton Parade	+	+	+	0	+	0	0	0	Improved bus reliability is likely to have positive impacts on those groups who are more likely to be bus users including women, young people, older people, people with disabilities and people from different ethnic groups.
Keston Mark development/ match funding	+	+	+	0	+	0	0	0	
Minor Pinch point removal	+	+	+	0	+	0	0	0	
SSRBV (LN) Support	+	+	+	0	+	0	0	0	
Casualty and road danger reduction									
Cluster sites	+	0	0	0	0	0	0	0	Prioritisation of road safety schemes in 'hotspot' areas where most KSIs have been recorded should help to reduce KSI rates amongst children and young people. These groups experience a disproportionately higher rate of pedestrian road accident casualties than the population overall.
Speed management and road danger reduction	+	0	0	0	0	0	0	0	
Carriageway marking reviews	+	0	0	0	0	0	0	0	
Local cycle infrastructure									
Local cycle network development	0	0	0	0	0	0	0	0	Increased cycle infrastructure, parking and segregated cycleways are likely to improve opportunities for sustainable travel. This also results in indirect impacts associated with increased physical activity and improved air quality. These opportunities can benefit all groups within the population.
A21 Corridor feasibility study	0	0	0	0	0	0	0	0	
Cycle parking and Cycle Hubs	0	0	0	0	0	0	0	0	
Cycle contraflows and small interventions	0	0	0	0	0	0	0	0	

LIP Projects	Age	Sex	Ethnicity	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Justifications/ Recommendations
Walking infrastructure development									
Severance reduction	+	0	0	0	+	0	+	0	Delivery of new pedestrian crossings will help to alleviate community severance, particularly in areas where this has been highlighted as an issue. This may be of particular help to more vulnerable road users including children, older people, people with disabilities and parents and/or carers with pushchairs and/or small children.
Healthy routes to schools	+	0	0	0	0	0	0	0	Support for schools to improving infrastructure for walking will help to create a safer and healthier environment for children travelling to school.
Walk London network enhancements	+	0	0	0	+	0	+	0	Small scale improvements to crossings and surfacing as part of the Walk London network could be of particular benefit to more vulnerable road users including children, older people, people with disabilities and parents and/or carers with pushchairs and/or small children.
Public transport interchange and access									
Quietway complimentary measures	0	0	0	0	0	0	0	0	Dedicated cycleways on quieter roads will increase access to cycling as a mode of transport for all groups.
Elmers End access improvements (to support potential National Cycle Network demonstrator project and complimentary to TfL's investment in Elmers End Tram stop)	0	0	0	0	0	0	0	0	Increased access to the tram network by walking and cycling has potential to improve access to opportunities for all including links to education, employment, healthcare and recreation.

LIP Projects	Age	Sex	Ethnicity	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Justifications/ Recommendations
Bus stop waiting facilities	+	0	0	0	+	0	+	0	Accessible bus stops at interchanges will increase opportunities for people with mobility impairments as well as people with pushchairs to use public transport and access opportunities to employment, education, healthcare and recreation.
AfA supporting measures	+	0	0	0	+	0	+	0	Access for All supporting measures and accessibility improvements at AfA stations will assist users with mobility impairments and pushchairs to access the rail network.
Parking controls and kerb space management									
CPZs (New/Reviews) and parking at stations	+	+	0	0	0	0	0	0	The use of CPZs and limiting parking at stations should increase the amount of travel by sustainable modes to stations which in turn would result in benefits around accessibility and cleaner air. All groups should benefit equally from this project; however, adequate provision for drivers with disabilities will need to be considered.
IPAs and bus reliability improvements i.e. Junction Protection	+	+	0	0	0	0	0	0	Improved bus reliability is likely to have positive impacts on those groups who are more likely to be bus users including women, young people, older people and people from different ethnic groups.
Car club/EVs initiatives	0	0	0	0	0	0	0	0	Car clubs can provide an opportunity for people to have access to car without ownership. This is a benefit that can be shared across all groups.

LIP Projects	Age	Sex	Ethnicity	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Justifications/ Recommendations
Scheme Development									
Advanced planning for future schemes	0	0	0	0	0	0	0	0	Planning and review of schemes and projects should also include consideration and monitoring of equality impacts to ensure that proposals are compliant with the PSED.
Review effectiveness of implemented projects	0	0	0	0	0	0	0	0	
Cycle training and promotion	+	0	0	0	0	0	0	0	Bikeability and Dr Bike will allow increased cycle training for all but may have a particularly positive impact on children. Monitoring should be undertaken to ensure that take up of cycle training and activities is proportionate in terms of participation with regards to ethnicity, sex and religious group.
Mode shift marketing	+	0	0	0	0	0	0	0	
Travel planning activities (inc. school expansion programme support)	+	0	0	0	0	0	0	0	Support for schools in improving infrastructure for walking will help to create a safer and healthier environment for children travelling to school.
Road safety education	+	+	0	0	0	0	0	0	Road safety education is likely to have a particularly positive impact on children and young people including young drivers. Young men are particularly vulnerable to road accidents and such this project is likely to have a positive impact on this group.

5. Conclusions

Conclusions

- 5.1 This report has outlined the approach, evidence and findings for the initial EqlA for the draft Bromley LIP3 (November 2018). The initial assessment has considered equality legislation and LB Bromley's duty under the Equality Act 2010 and PSED as well as evidence from national demographic datasets and TfL research associated with the needs and requirements of PCGs.
- 5.2 The initial assessment has been undertaken by reviewing each of the projects and programmes set out in the draft LIP3 and identifying any potential differential or disproportionate negative or positive impacts on groups with protected characteristics.
- 5.3 The findings of the initial assessment has found that the draft LIP3 does not have any disproportionate or differential negative impacts on any one population group and can help to mitigate barriers and advance equality of opportunity for specific groups using the transport network.
- 5.4 Specific benefits are likely to be realised through reduction in road accident casualty rates which disproportionately impact children, young people and young male drivers. Increased levels of travel by sustainable modes leads to more physical activity and associated health benefits as well as increasing opportunities to local services and facilities. Walking and cycling links to public transport help to increase access to opportunities further afield for all groups with regards to employment, education, healthcare and recreation. Reductions in car use and increases in walking and cycling also lead to cleaner air which has a benefit for more vulnerable groups including children.
- 5.5 Consultation will be undertaken on the draft LIP in November 2018 and feedback from this will be reviewed to make sure that the findings of the EqlA are robust.

Further EqlA activities

- 5.6 The draft LIP will be subject to public consultation in November 2018 and responses relating to groups with protected characteristics will be considered and this EqlA report will be updated to reflect any issues highlighted in the feedback. In addition to the updated report, an official London Borough of Bromley Equality Impact Assessment form will be completed and published on the Council's website
- 5.7 Individual projects and programmes that help achieve the LIP outcomes should, in most cases, be subject to their own EqlA to ensure they comply with the PSED.
- 5.8 In the longer term it may also be necessary to undertake a full review of the EqlA. This should include:
 - Monitoring of equality impacts of individual LIP projects and programmes prior to design and implementation stages;
 - Update of datasets relating to groups with protected characteristics; and
 - Relevant performance indicators and other such measurement frameworks.

Appendix A Appendix A: Equalities Baseline Maps

Figure A-1: PTAL scores

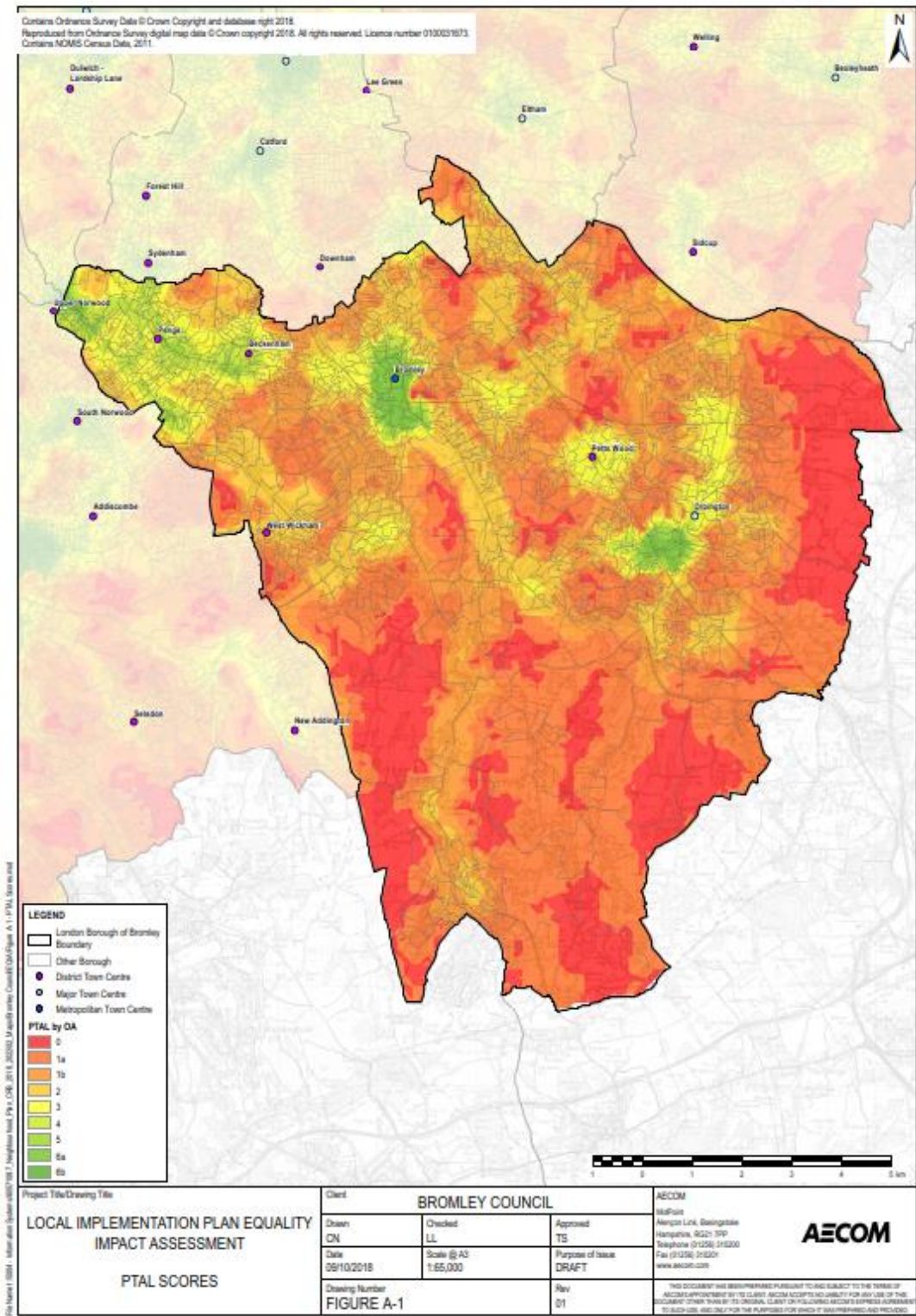


Figure A-2: Healthcare facilities

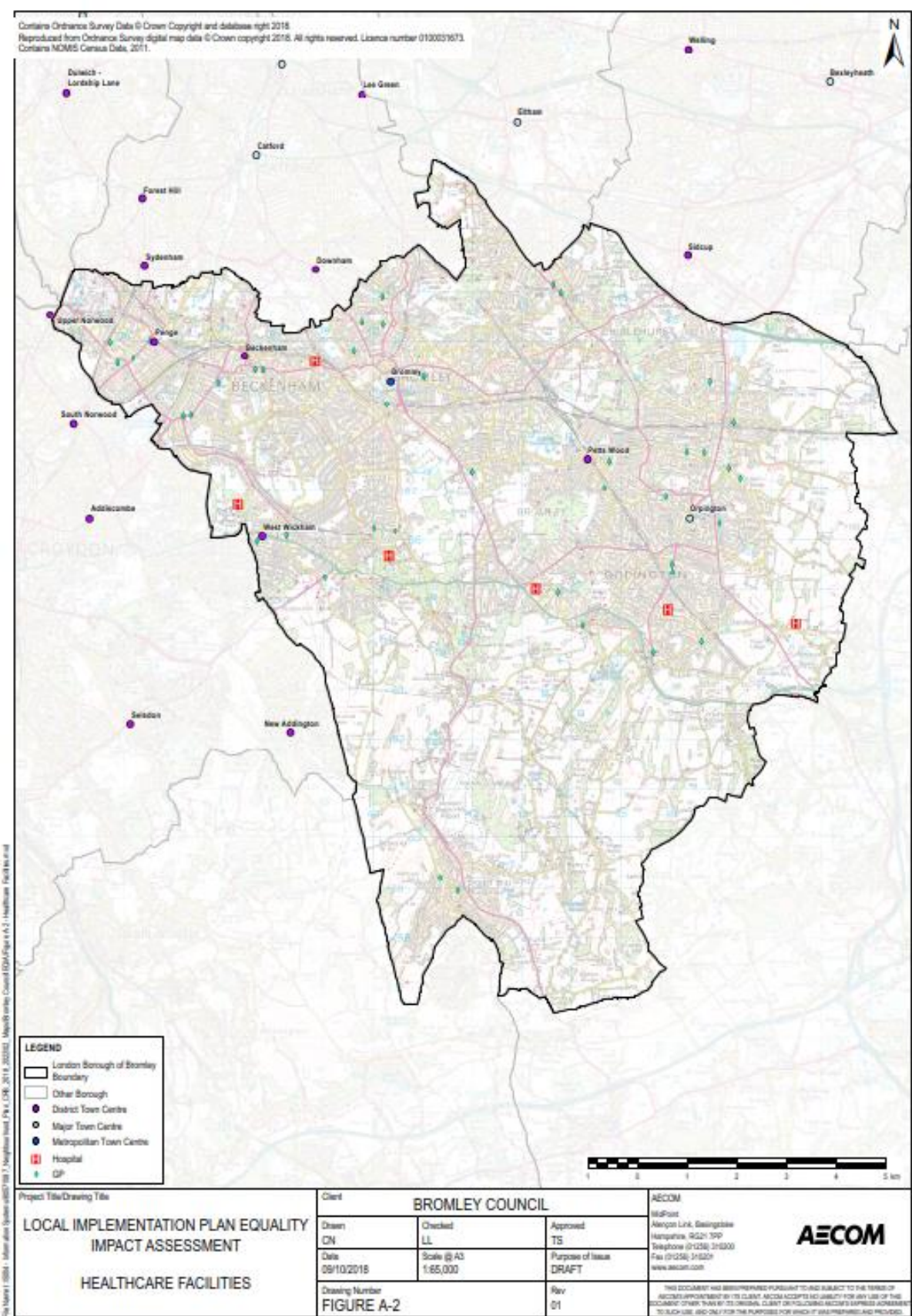


Figure A-3: Educational establishments

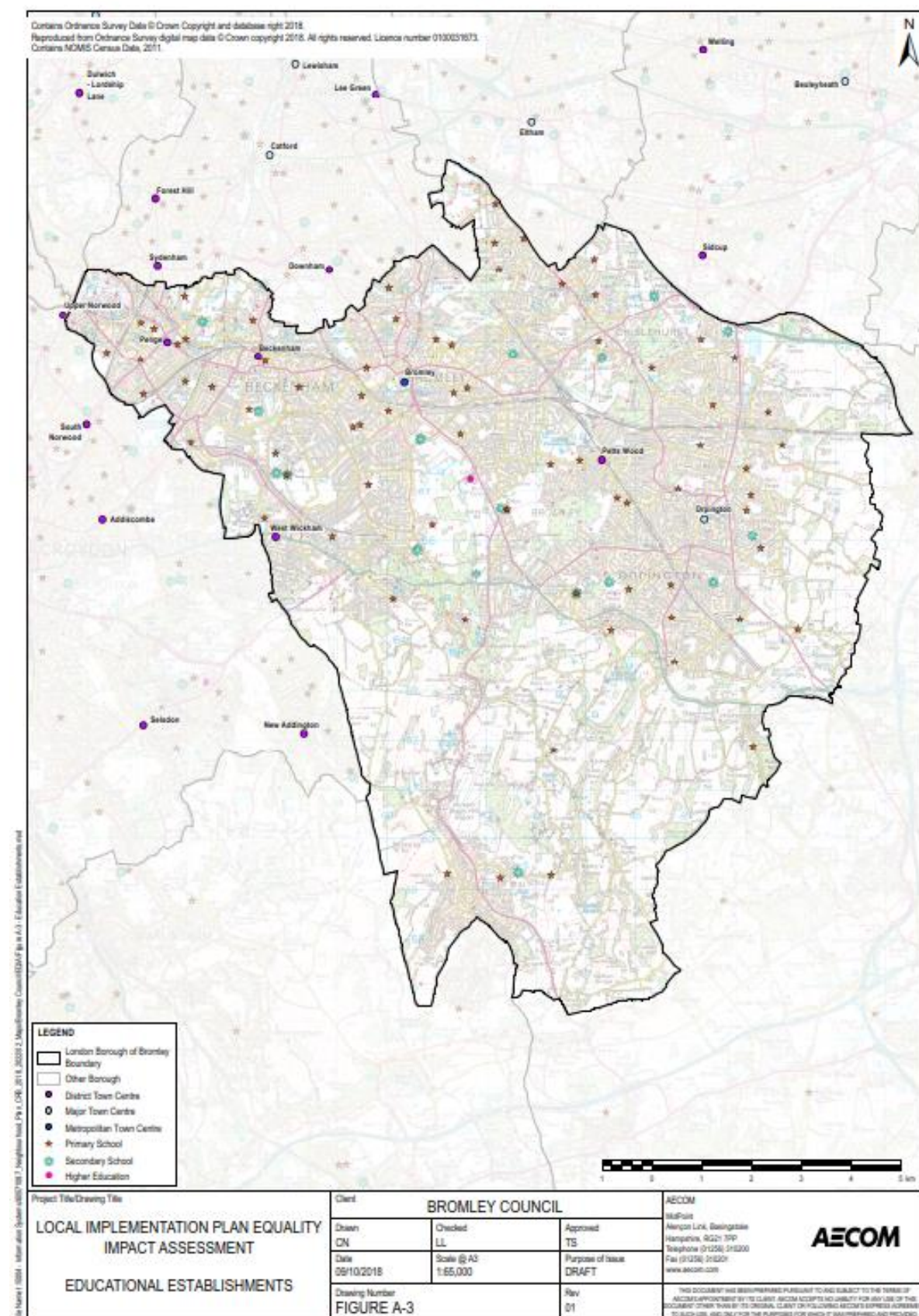


Figure A-4: Business areas

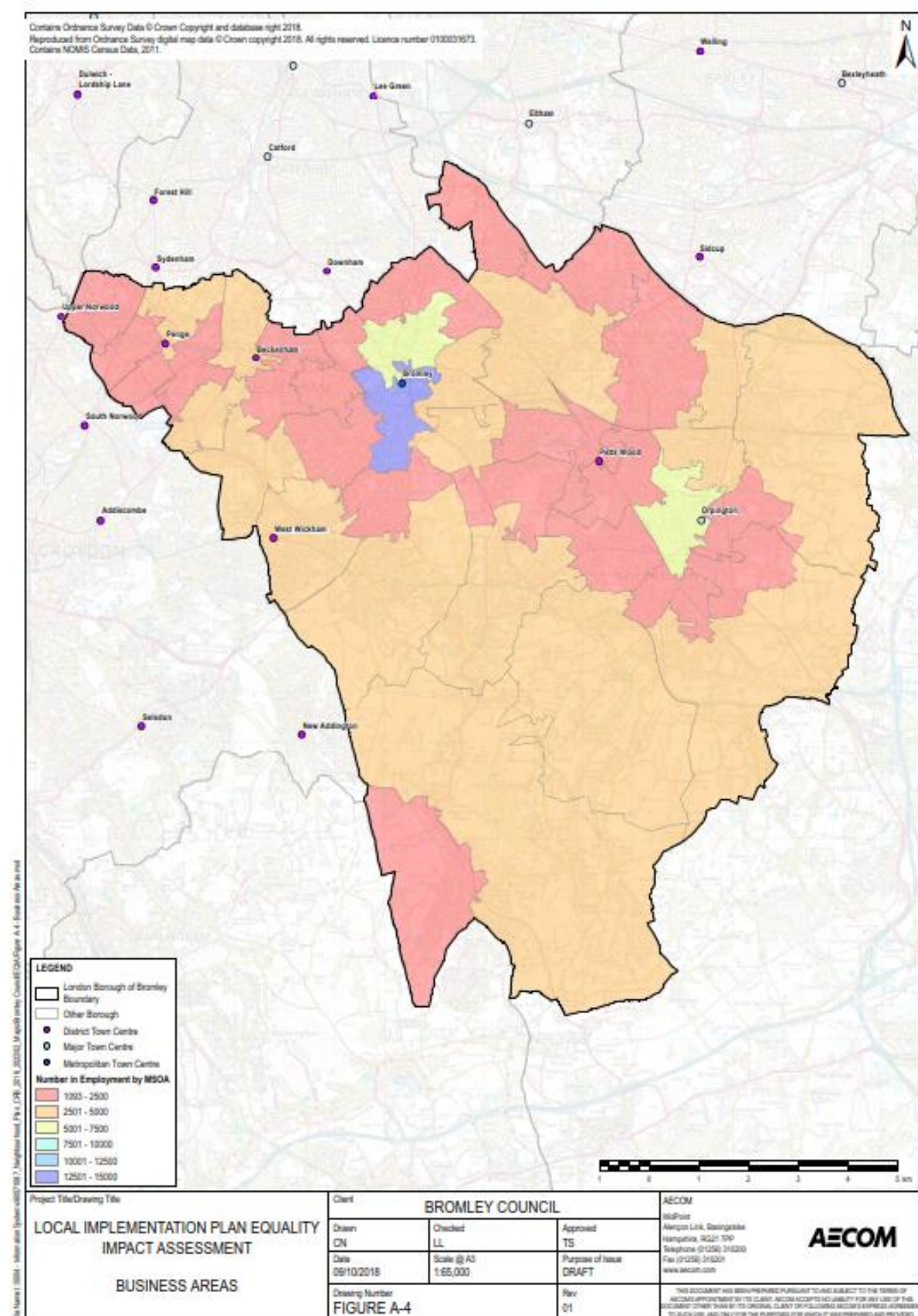


Figure A-5: Population aged under 25 years

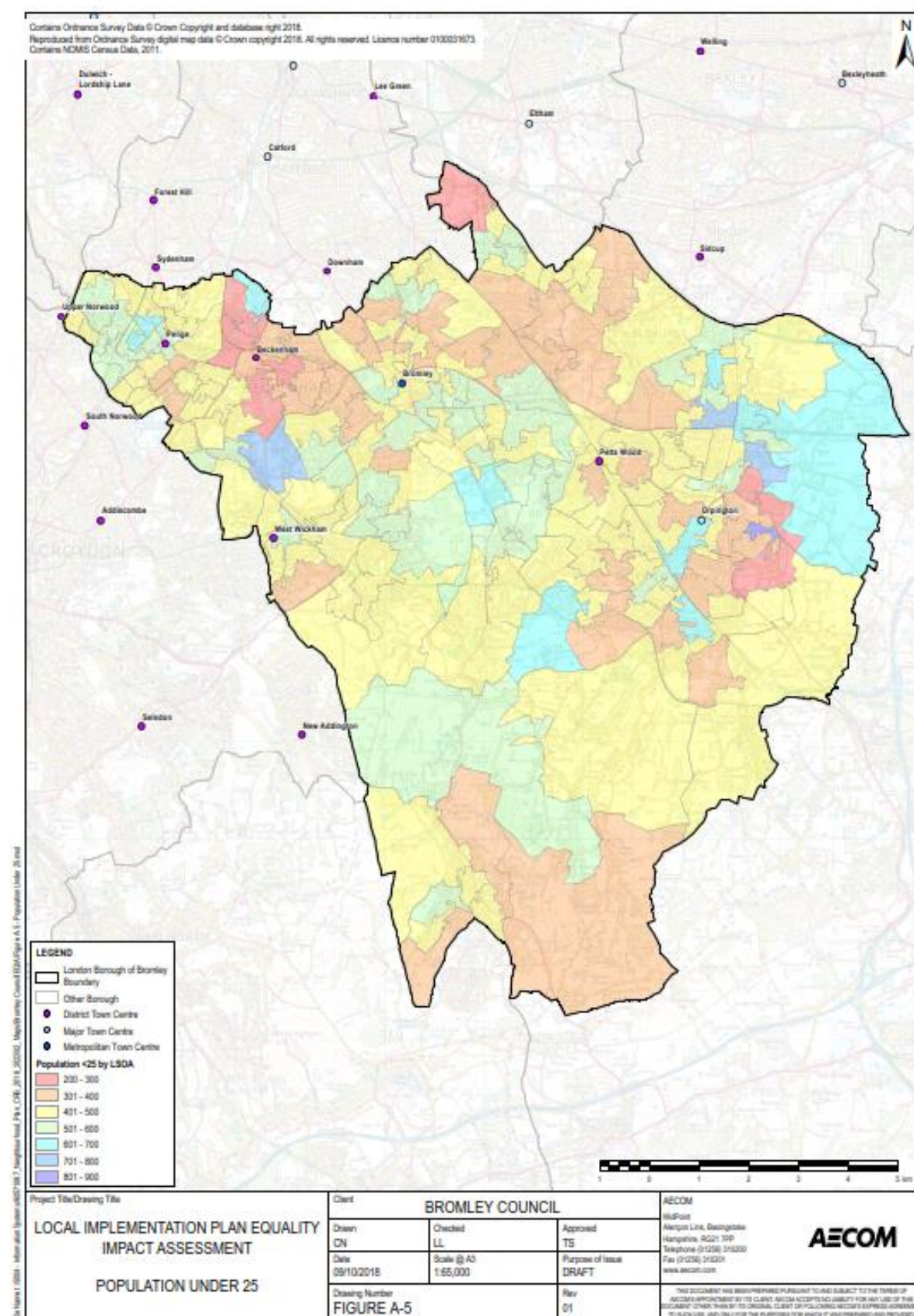
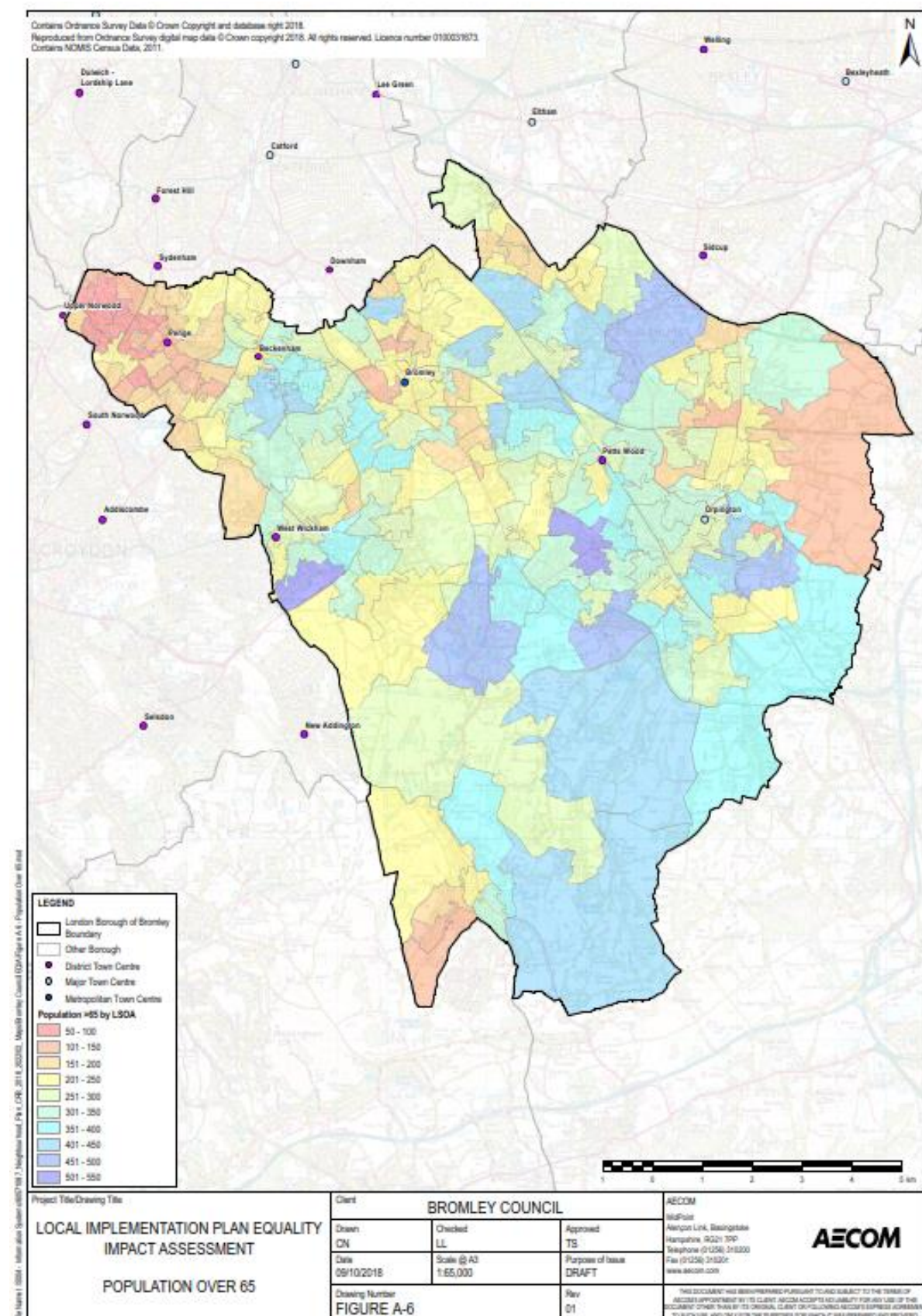


Figure A-6: Population aged 65 and over



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 Contains NOMS Census Data, 2011.

LEGEND

- London Borough of Bromley Boundary
- Other Borough
- District Town Centre
- Major Town Centre
- Metropolitan Town Centre

Population >85 by LSOA

- 0 - 20
- 21 - 40
- 41 - 60
- 61 - 80
- 81 - 100
- 101 - 120
- 121 - 140
- 141 - 160

Project Title/Drawing Title: LOCAL IMPLEMENTATION PLAN EQUALITY IMPACT ASSESSMENT POPULATION OVER 85

Client: BROMLEY COUNCIL		AECOM	
Drawn: ON	Checked: LL	Approved: TS	WSPort Hempston Link, Gillingham Hempston, RG21 1PP Telephone: (01256) 316200 Fax: (01256) 316201 www.aecom.com
Date: 09/10/2018	Scale: (g) A3 1:65,000	Purpose of Issue: DRAFT	
Drawing Number: FIGURE A-7		Rev: 01	

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Figure A-8: BAME population

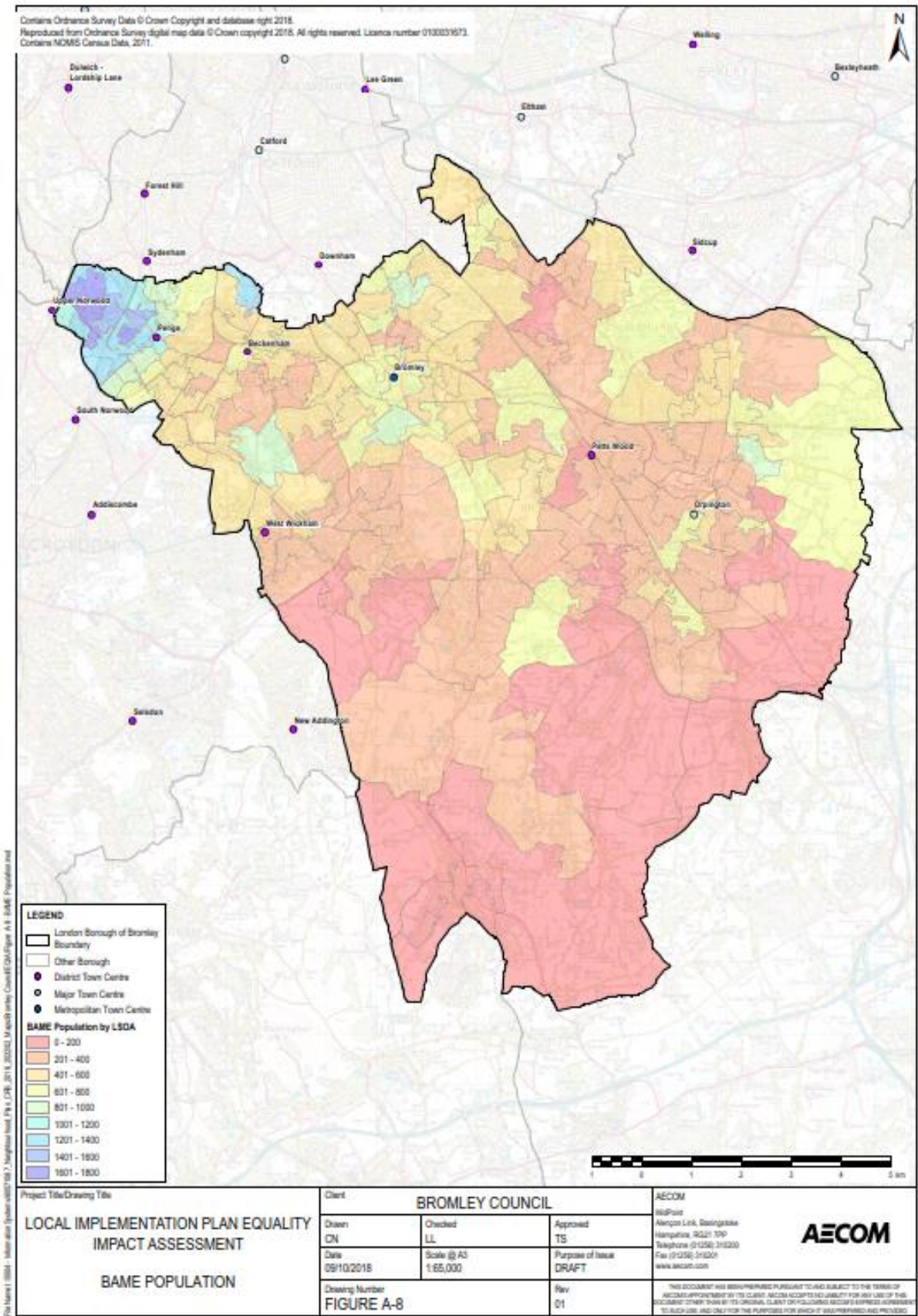
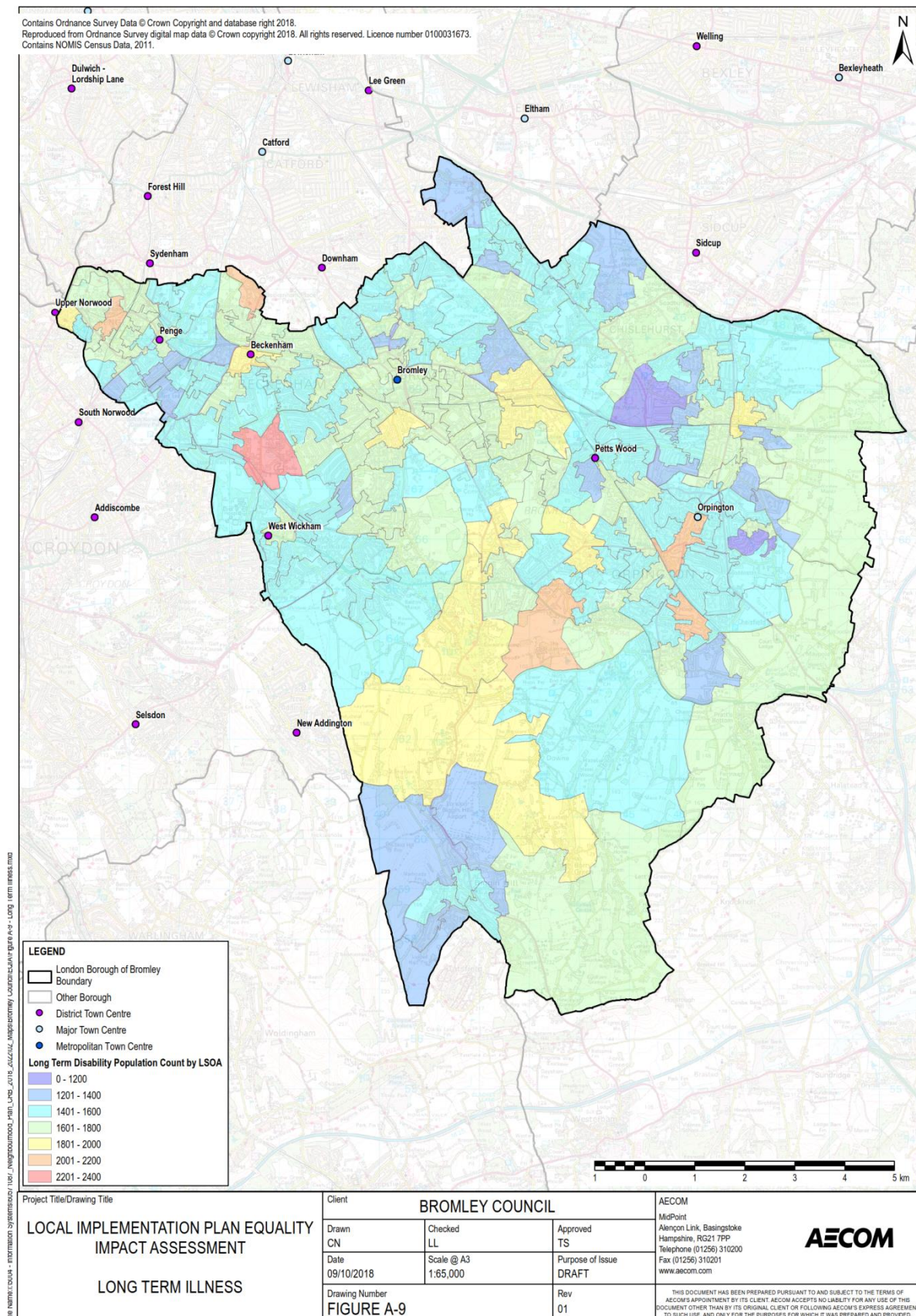


Figure A-9: Population with long-term limiting illness



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LEGEND

- London Borough of Bromley Boundary
- Other Borough
- District Town Centre
- Major Town Centre
- Metropolitan Town Centre

IMD Rank by LSOA

- 0 - 5000
- 5001 - 10000
- 10001 - 15000
- 15001 - 20000
- 20001 - 25000
- 25001 - 30000
- 30001 - 35000

1 2 3 4 5 km

Project Title/Drawing Title LOCAL IMPLEMENTATION PLAN EQUALITY IMPACT ASSESSMENT		Client BROMLEY COUNCIL		AECOM WSP Nelson LK, Basingstoke Hampshire, RG22 7YD Telephone (01256) 516300 Fax (01256) 516301 www.aecom.com	
Drawn CN	Checked LL	Approved TS		AECOM	
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Figure A-11: Population with NVQ Level 4+

