



Equalities Analysis Assessment – Sustainable Streets for Evelyn and New Cross Gate

Author	Martha Lauchlan	Directorate	Place
Date	20/11/2023	Service	Strategic Transport and Highways
1. The activity or decision that this assessment is being undertaken for			
<p>Lewisham Council wants 80 per cent of all journeys to be made by walking, cycling and public transport by 2041. This will help to improve air quality and road safety, reduce noise and congestion, and make neighbourhoods greener, healthier, and more enjoyable places to live, work and play. Reducing car use is critical to playing a part in tackling the climate crisis.</p> <p>The Sustainable Streets programme proposes to make better use of road space and pavements in the borough by installing electric vehicle charging points, cycle hangars, and street trees, as well as improving road safety and ensuring better management of on-street parking.</p> <p>The Sustainable Streets programme will also support Lewisham’s delivery against several borough and London-wide strategies and policies including:</p> <ul style="list-style-type: none">• Lewisham Corporate Strategy 2022-2026• Future Lewisham 2021• Climate Emergency Action Plan 2019• Air Quality Action Plan 2022 – 2027• Transport Strategy and Local Implementation Plan 2019 – 2041• Mayor of London’s Transport Strategy 2018• Mayor of London’s Vision Zero Action Plan 2021• Mayor of London’s Cycling Action Plan 2018• Mayor of London’s Walking Action Plan 2018• London Environment Strategy 2018 <p>The proposals for Sustainable Streets measures in the Evelyn and New Cross Gate area, as noted in the ‘Sustainable Streets – Phase 1 recommendations and next steps’ report reflect feedback and requests from the Lewisham community over recent years. Residents often request resident parking permits to reduce commuters taking up space, as well as significant numbers of requests for EV charging bays and cycle hangars. At current, these measures cannot be</p>			

introduced at the rate at which they are requested due to limited funding available. This EAA will feed into the Sustainable Streets report presented to Mayor and Cabinet on 6th December 2023.

2. The protected characteristics or other equalities factors potentially impacted by this decision

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Ethnicity/ Race	<input type="checkbox"/> Religion or belief	<input type="checkbox"/> Language spoken	<input type="checkbox"/> Other, please define:
<input type="checkbox"/> Gender/Sex	<input type="checkbox"/> Gender identity	<input checked="" type="checkbox"/> Disability	<input type="checkbox"/> Household type	
<input checked="" type="checkbox"/> Income	<input checked="" type="checkbox"/> Carer status	<input type="checkbox"/> Sexual orientation	<input type="checkbox"/> Socio Economic status	
<input type="checkbox"/> Marriage and Civil Partnership	<input type="checkbox"/> Pregnancy and Maternity	<input type="checkbox"/> Refugee/ Migrant/ Asylum seeker	<input checked="" type="checkbox"/> Health & Social Care	
<input type="checkbox"/> Nationality	<input type="checkbox"/> Employment	<input type="checkbox"/> Armed forces		

Most groups will have a positive or neutral impact overall as the improvements will help deliver environmental, health and road safety benefits to all residents and visitors to the area.

It is recognised that for some protected groups that must take journeys by motor vehicle, they will be disproportionately negatively impacted. A number of these will be mitigated however by exemptions for blue badge holders, carer permits, availability of visitor permits, discounted resident and business permits in year one and emissions-based permit pricing.

Protected Characteristics and Lewisham's equality objectives are fully analysed in section 5 – impact summary.

3. The evidence to support the analysis

From 11th August until 24th September 2023, the Council delivered a consultation with residents, businesses, and relevant community organisations on Phase 1 of the Sustainable Streets programme. This programme was developed as per Section 4 of the 'Sustainable Streets – Phase 1 recommendations and next steps' report.

The Sustainable Streets programme aims to promote a transition towards more sustainable modes of travel. The proposals put forward a package of measures, which included:

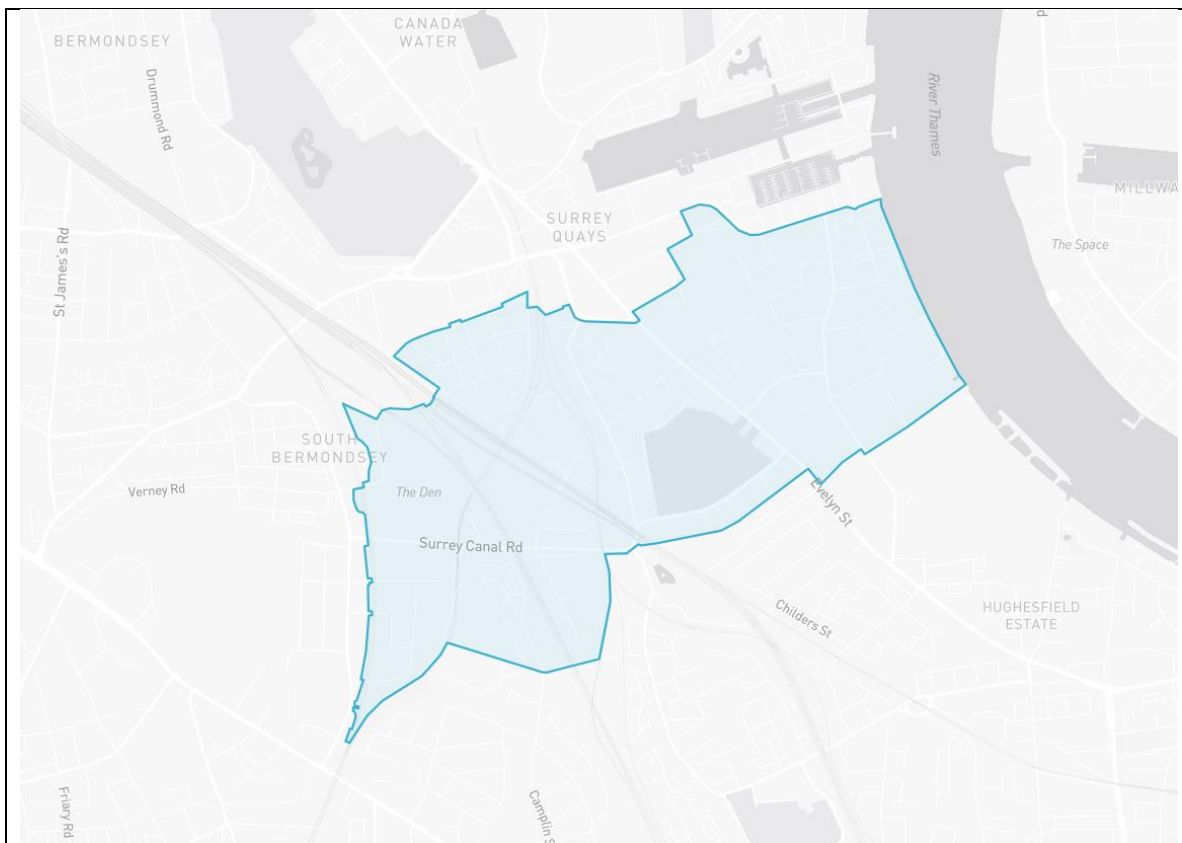
- Electric vehicle charging points
- Cycle hangars
- Double yellow lines at all junctions to improve road safety
- Tree planting
- Car clubs
- Permit parking for residents and businesses

Inclusive communications and engagement

All of the consultation and engagement activities helped shape the development of a robust Equality Analysis Assessment (EAA), demonstrating LBL's compliance with their Public Sector Equality Duty (PSED). Stakeholder and community insights can ensure the EIA identifies where members of the community may be disproportionately impacted, determine appropriate mitigations, and ensure decision-making processes are more inclusive.

We endeavoured to mitigate against all barriers to participation to encourage and enable everyone in the community to participate. Some ways we did this included:

- Actively monitoring participation demographics and identify ways to encourage participation among less represented people/groups.
- Worked with groups like AgeUK, carer networks and local mobility forums to engage with older and disabled people, and ensure this engagement met accessibility standards.
- Engaged with established forums to connect with people in ways they are already active and comfortable with, reducing reliance on them to engage with less familiar or trusted channels – like Places of Worship and community groups.
- Translated materials into languages other than English where appropriate.
- Made it as easy as possible for people who are time poor to participate, by going to where they are likely to be – schools, markets, and transport hubs.
- Ensure there isn't an overreliance on digital/social media participation to reduce the risk of digital exclusion.



The consultation area for Evelyn and New Cross Gate covers the area west of the train tracks, up to Millwall Stadium and Bridge Meadows area, and to the east it includes most of the area up to Rotherhithe New road (to the north) and Gosterwood Road (to the south).

Consultation programme

The consultation programme was designed to understand public opinion on proposed concept designs and ensure local feedback was considered as a part of the decision-making process. By incorporating feedback gathered during the consultation, changes, and recommendations can be re-designed to reflect the local priorities and needs but also mitigate any potential negative impacts of the proposals that might impact adversely only residents with particular protected characteristics.

Consultation survey

A consultation survey was the formal method used to capture feedback on the proposals. The consultation survey was embedded on the project webpage and linked directly via QR codes on consultation materials (leaflet, lampposts, roll banner).

Hardcopy versions were available on request via the phone service, and available to pick-up from 2000 Community Action Centre, as well as complete directly with residents and businesses during door-knocking and pop-up sessions. A total of 554 survey responses were received for the overall programme of proposed measures including 521 online surveys and 33 hard copy surveys.

Virtual stakeholder briefings

We reached out to key stakeholder groups during the engagement, including interest groups within Lewisham and those who are potentially impacted by the proposals or representative of communities, such as local businesses, schools, and churches.

Two stakeholder meetings lasting 1.5 hours were hosted on Microsoft Teams:

- Friday 4th August 2-3:30pm
- Wednesday 9th August 3:30-5pm

Attendees included Lewisham Cyclist Campaign (LCC), Street Trees for Living, Evelyn Children Centre, Transport for London (TfL) and Wheels for Wellbeing.

Pop-up session

A face-to-face session was scheduled at Grand Canal Avenue in order to engage with residents who live in apartment blocks in the surrounding area. The session was held on Thursday 14th September between 3-6:30pm targeting those who may be returning from school run or work, and had 25-30 attendees.

Door knocking

Weekly monitoring of the survey responses allowed LBL to observe consultation response rates, including areas with low or no responses.

Door-to-door visits were made by PCL employees on Wednesday 13 September and Friday 15 September. These visits included targeting streets and households who have not responded to the survey. The outcomes of these door-knocking sessions are summarised below.

Streets – Wednesday 13 th September 2023	No. of Doors Knocked / Hardcopies posted	Access		
		Yes		No
		Survey Complete	Left paper copy	Left paper copy
Recluver House	9	2	3	4
Penhurst House	8	1	2	5
Otford House	11	2	7	2
Sankofa Nursery	1		1	
Sissinghurst House	5	1	2	2
Silwood House	7			7
Crane Mead	14			14
Goldsworth Gardens	19	4		15
Alpine Road	5		4	1
Island Road	34	1	2	31
Total	113	11	21	81
Streets – Friday 15 th September 2023				
Streets – Friday 15 th September 2023	No. of Doors Knocked / Hardcopies posted	Access		
		Yes		No
		Survey Complete	No survey complete	
Grove Street	27	5	1	21

Jodane Street	15	3	9	3
Concorde Way	32			32
Goldsworthy Gardens	14			14
Recluver Way	30			30
Silwood Street Apartments	28			28
Sketchley Gardens	12	1	2	9
Total	158	9	12	137

Dedicated project webpage

A dedicated webpage was hosted on the Commonplace platform which included:

- The online survey
- The bespoke designs for roads within the consultation area
- FAQs
- Link to the Council's parking webpage to find out eligibility of permit for certain groups and permit cost calculator
- Contact email address for consultation queries

Leaflet and lamppost wraps

A total of 8,016 leaflets were delivered to all properties in the consultation area and were an important way of increasing awareness. The six-page leaflet including key information about the proposals, customised maps of proposals on their street and information about how to participate.

120 posters and lamppost wraps were put up across 14 roads to promote the consultation.

Media relations

A press release was published on the launch day of the consultation which contained a link to the survey and the consultation was also promoted on social media across various channels.

Emails and calls

The postcard sent to all respondents also published an email for any queries and phone number to leave a voicemail with their details to request a hard copy of the online survey.

4. The analysis

Key analysis findings for Evelyn and New Cross Gate

Key findings

- **A total of 431 respondents from 373 unique households responded to the survey.** This gives a response rate of 4.65% of the total number of households that were leafleted.

- In general, there were mixed responses on the introduction of parking permits, car club bays, and loading bays and if they would improve specific roads. There was a good level of agreement that other measures, in particular more tree planting, which was universal across all areas.
- The response data shows that it was not felt that parking permits in the Deptford Park and Pepys Park area would be beneficial, though some of these responses came from those within Car Free Developments which may explain this. There was also agreement that other measures could improve the area, with the exception of loading bays and car club bays.
- Most were in favour of applying the same times of operation (Mon-Fri, 9am-5pm) set to go ahead in Deptford, for Evelyn and surrounding areas.

Participant profile

- Most respondents were white, more likely to be women, and in their late 20's to early 40s.
- Most were either atheist or Christian and do not consider themselves disabled.

Response for parking permits on Silwood Estate and South of Surrey Canal Road

- The southern section of Surrey Canal Road saw agreement for sustainable measures, while Silwood Estate also agreed with some of the proposed measures.

Local business / stakeholder concerns

- A couple of local businesses were worried about the impact on trade and their staff.

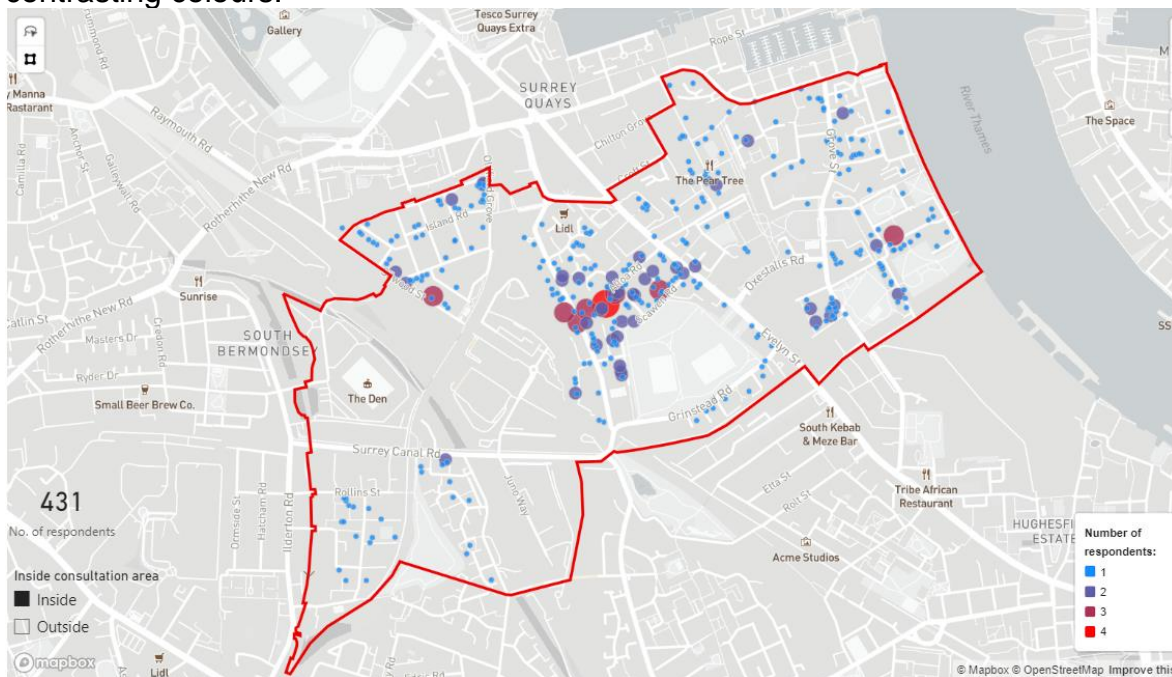
- Staff parking at Twin Oaks Primary School was a major concern for those accessing the school.

Other analysis

- Those who said that commuter parking took up a lot of space were more likely to agree that parking permits would deter this and resolve problems.
- Many people commented that permits were too expensive.
- Other comments went into detail mentioning certain locations of these features that were proposed.

Analysis of Evelyn and New Cross Gate consultation responses

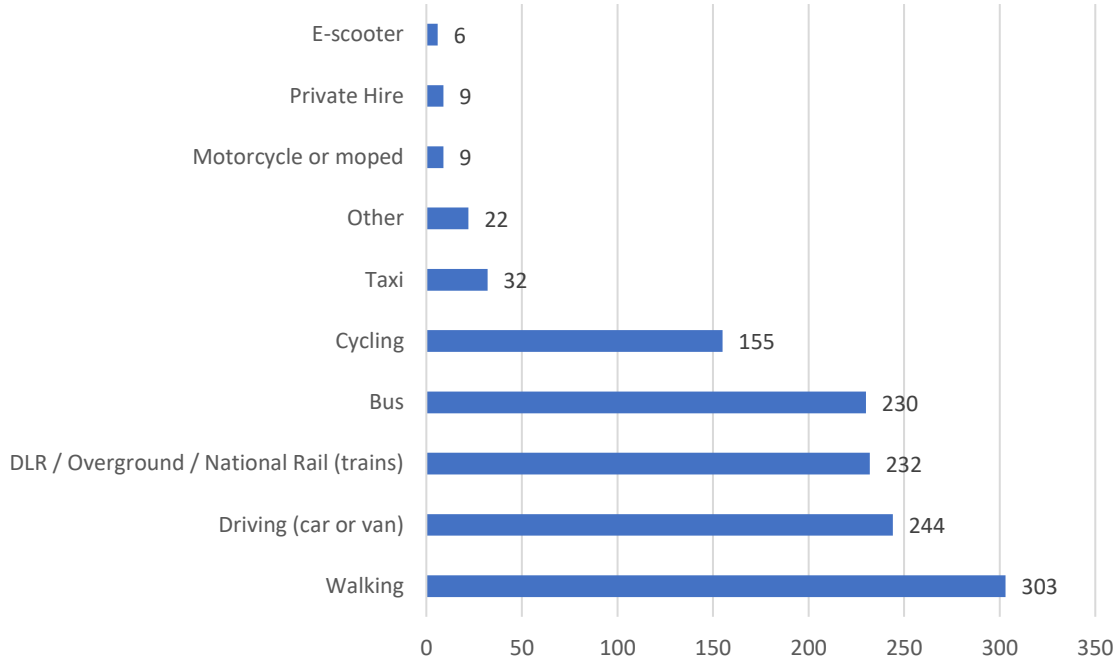
The map below shows the geographical distribution of household responses in Evelyn and New Cross Gate. Multiple submissions were often made from the same household; these households have been visualised as bigger circles with contrasting colours.



Transport choices

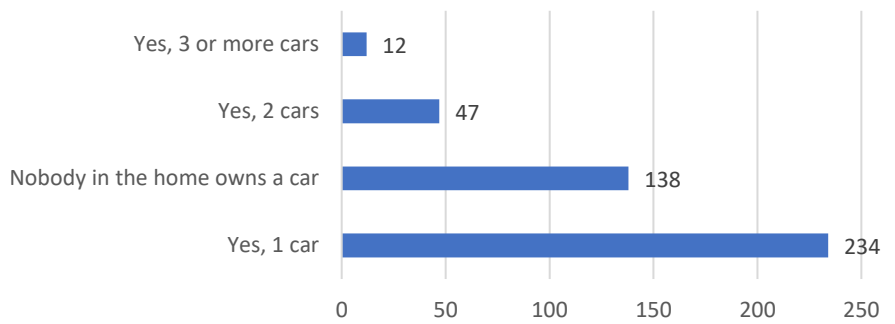
The chart below has tallied the number of people who selected that they used each mode of travel as one of their top three preferences.

What mode of transport do you use for most of your journeys?



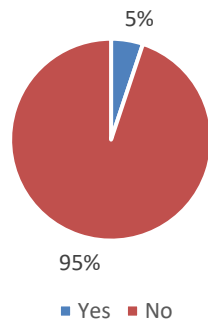
Most respondents in the area tended to either walk, drive or use public transport.

Do you or anyone in your home own a car?



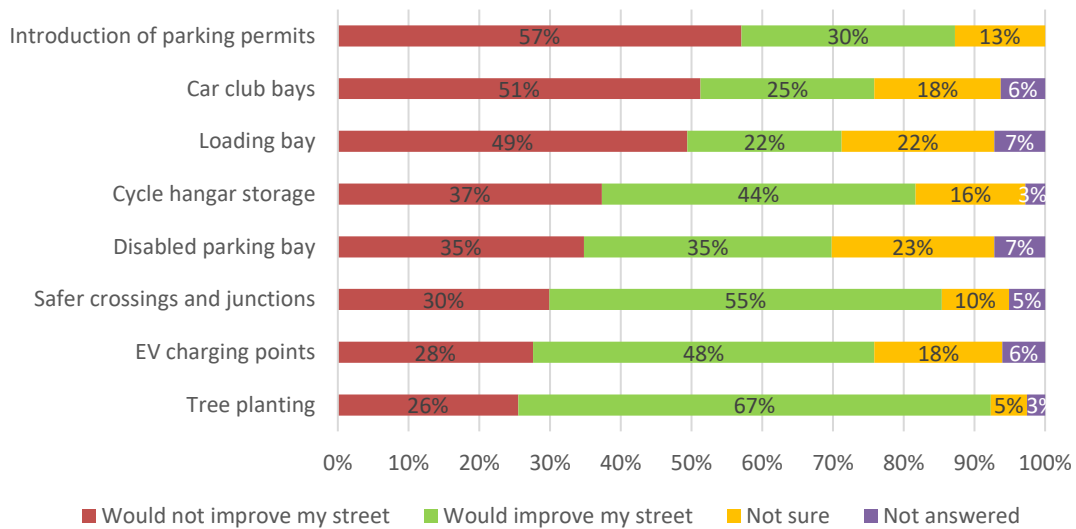
Most respondents (68%) owned at least one car – this contrasts to the census data for the area which indicates that car ownership by household is approximately 39%.

Do you or anyone in your home have a Blue Badge permit?



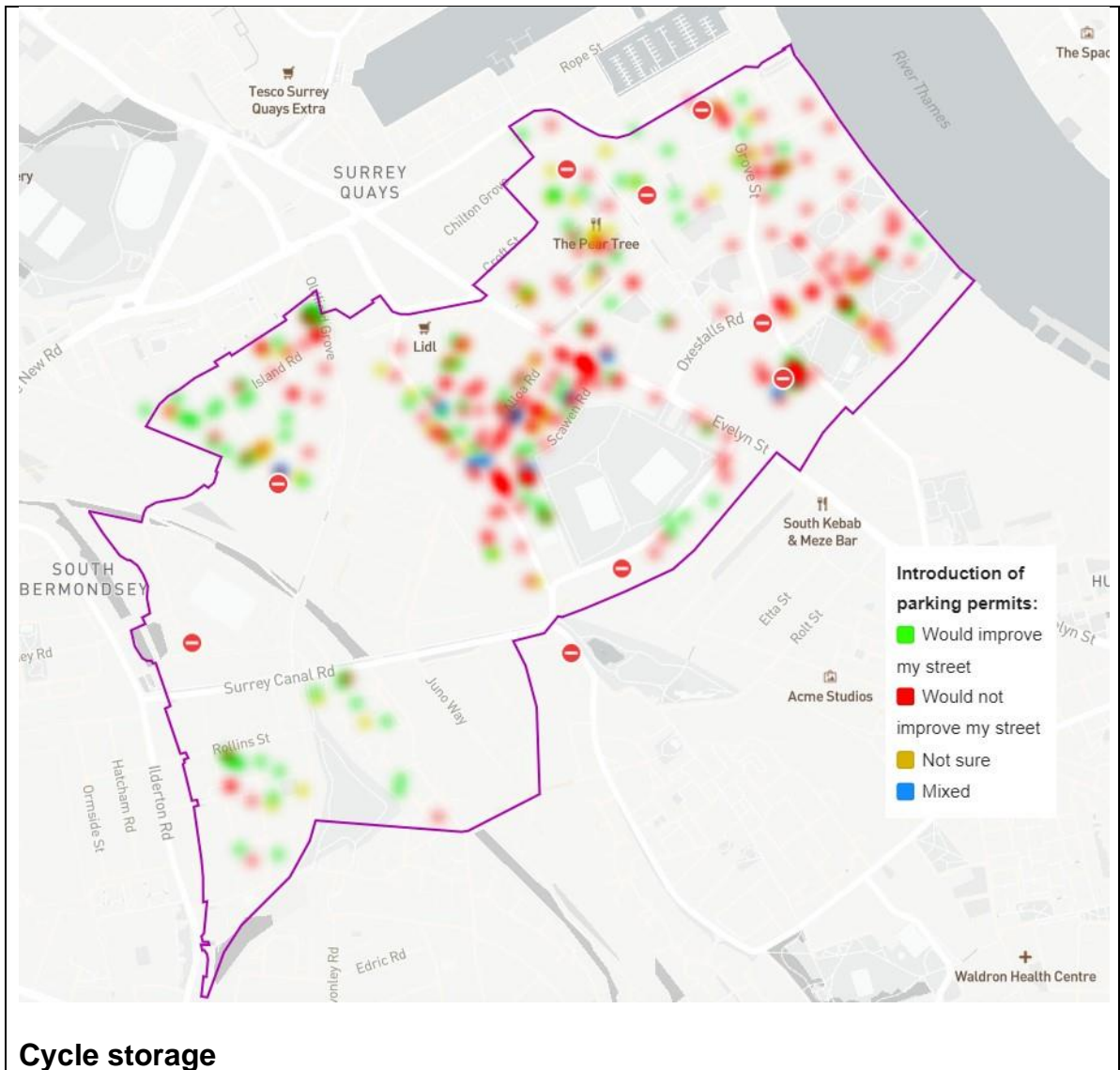
Most respondents said that they or someone in their home did not hold a Blue Badge.

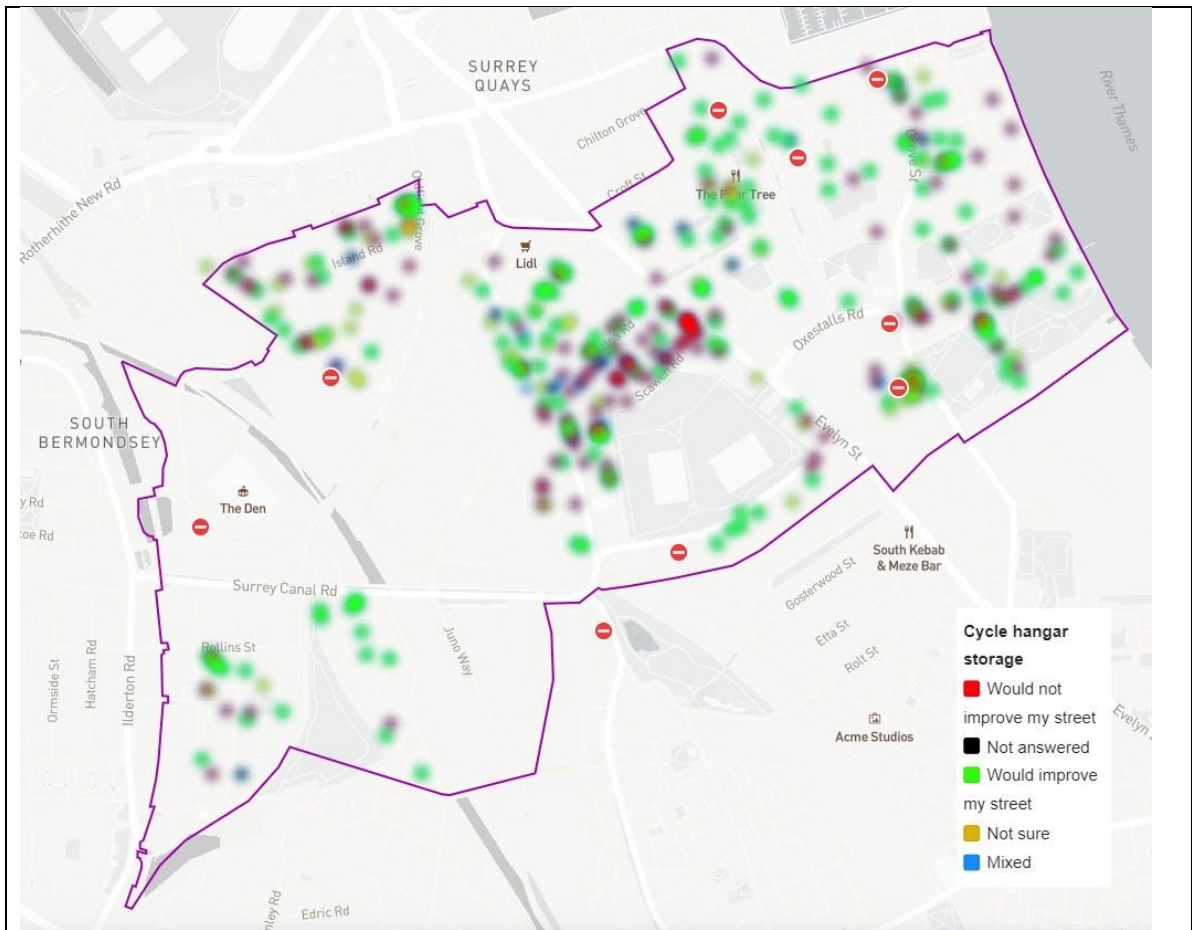
Please tell us how you feel about the proposed changes on your street.



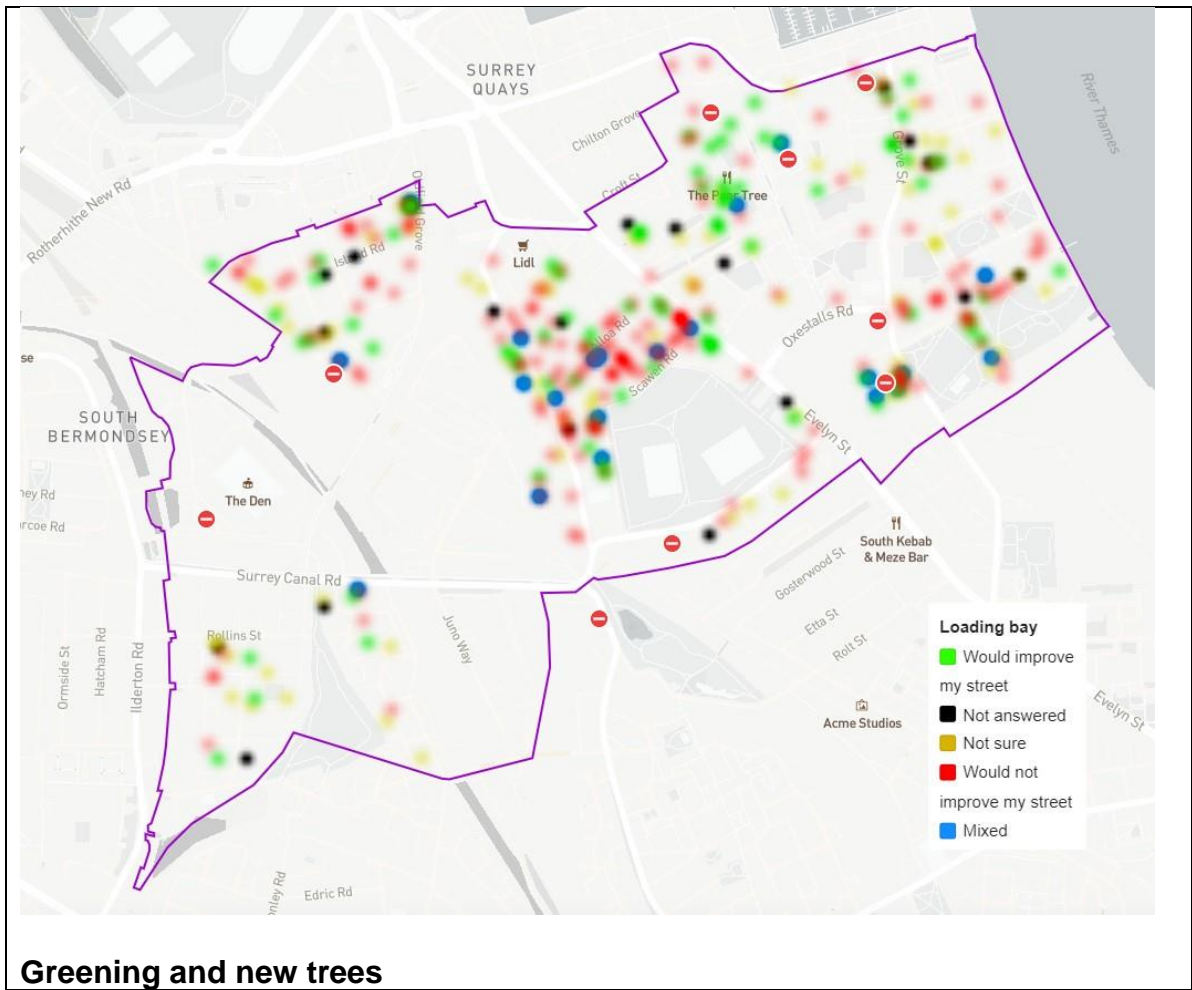
This shows the breakdown of responses about whether each measure proposed would improve or not improve residents' streets. Below are heat maps showing the distribution of responses per measure.

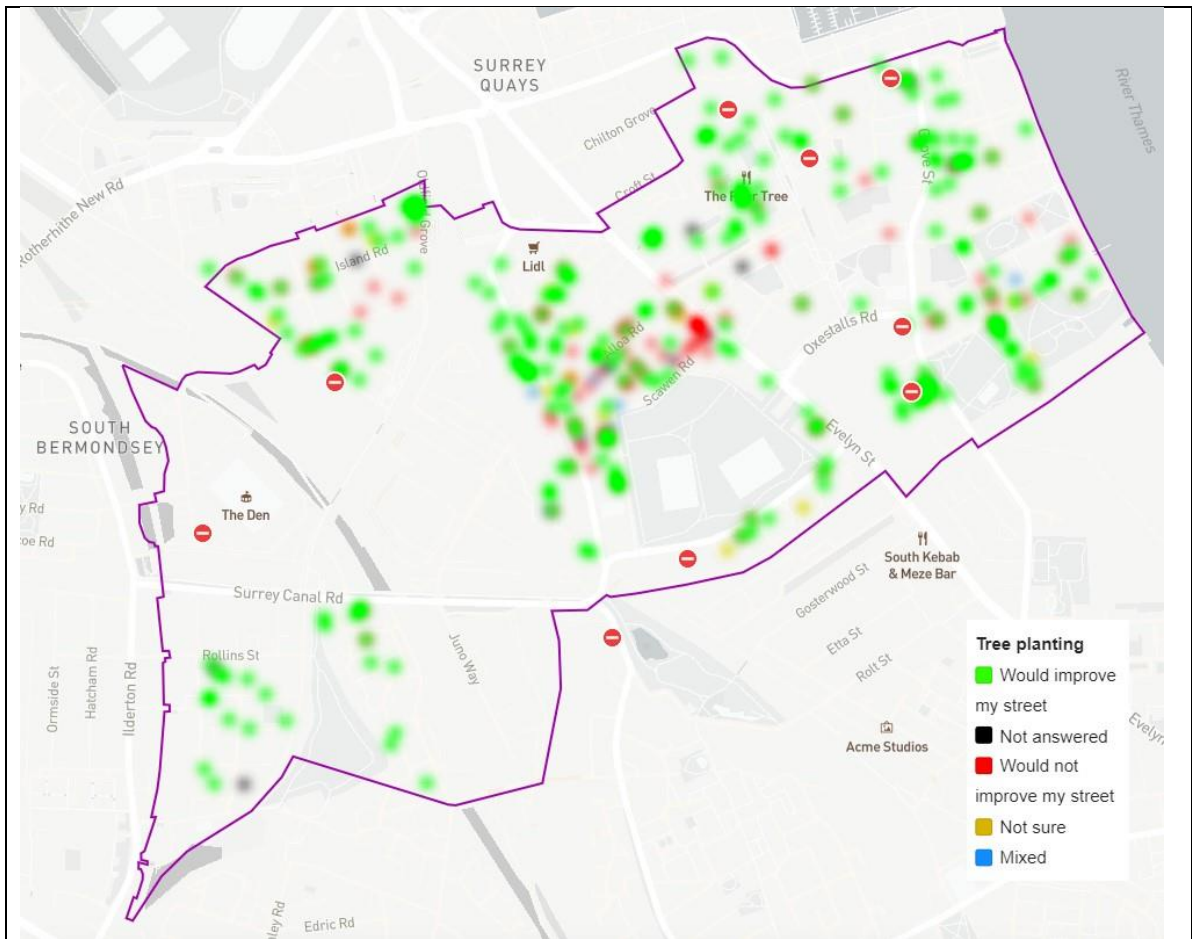
Parking permits



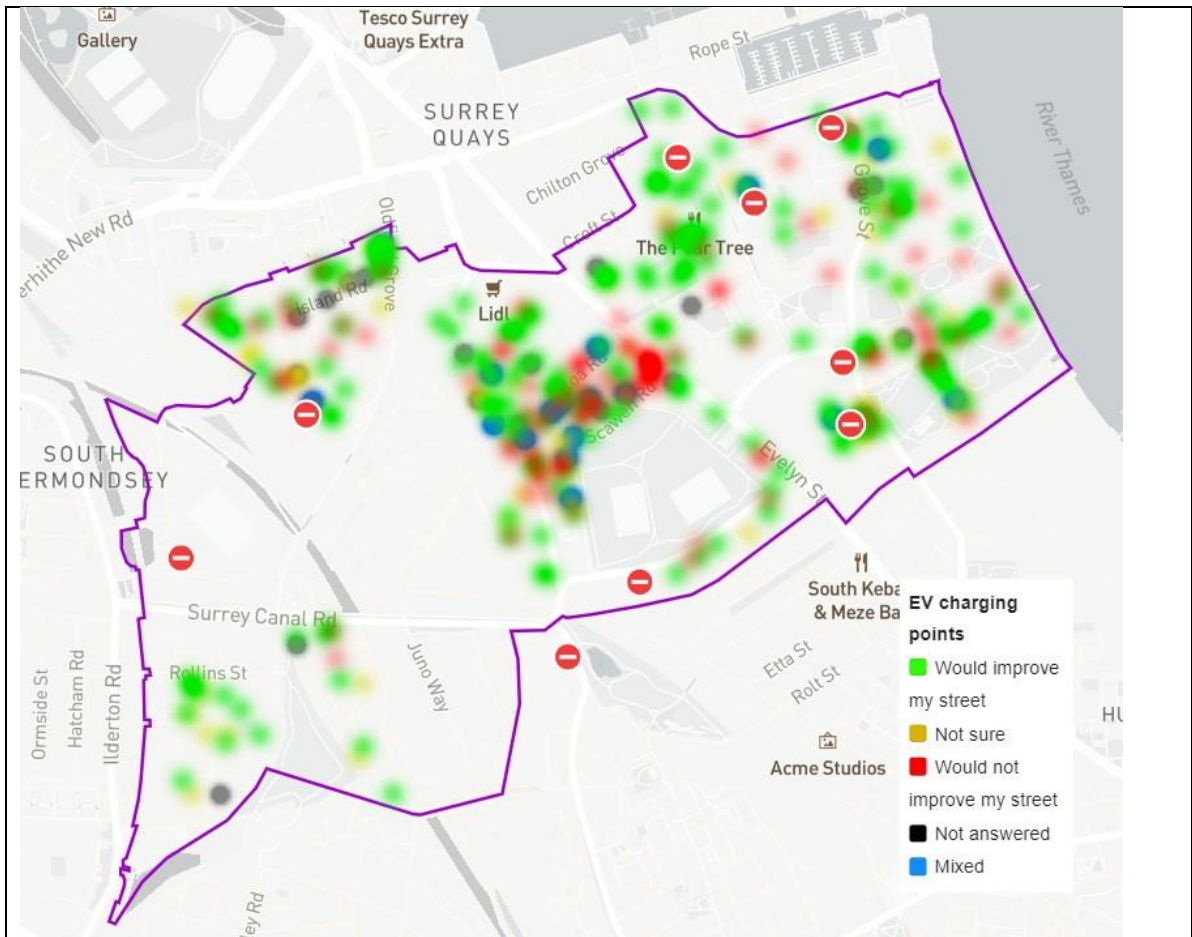


Loading bays

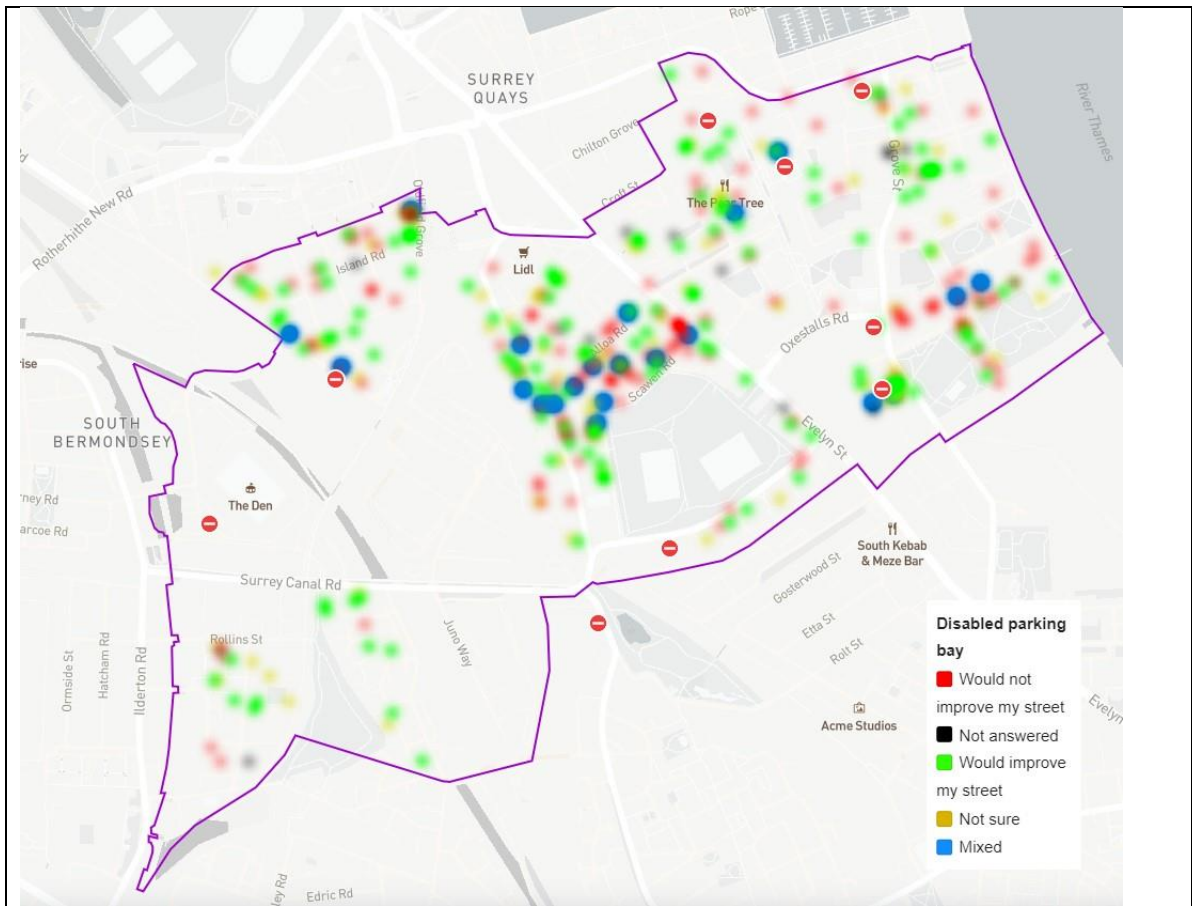




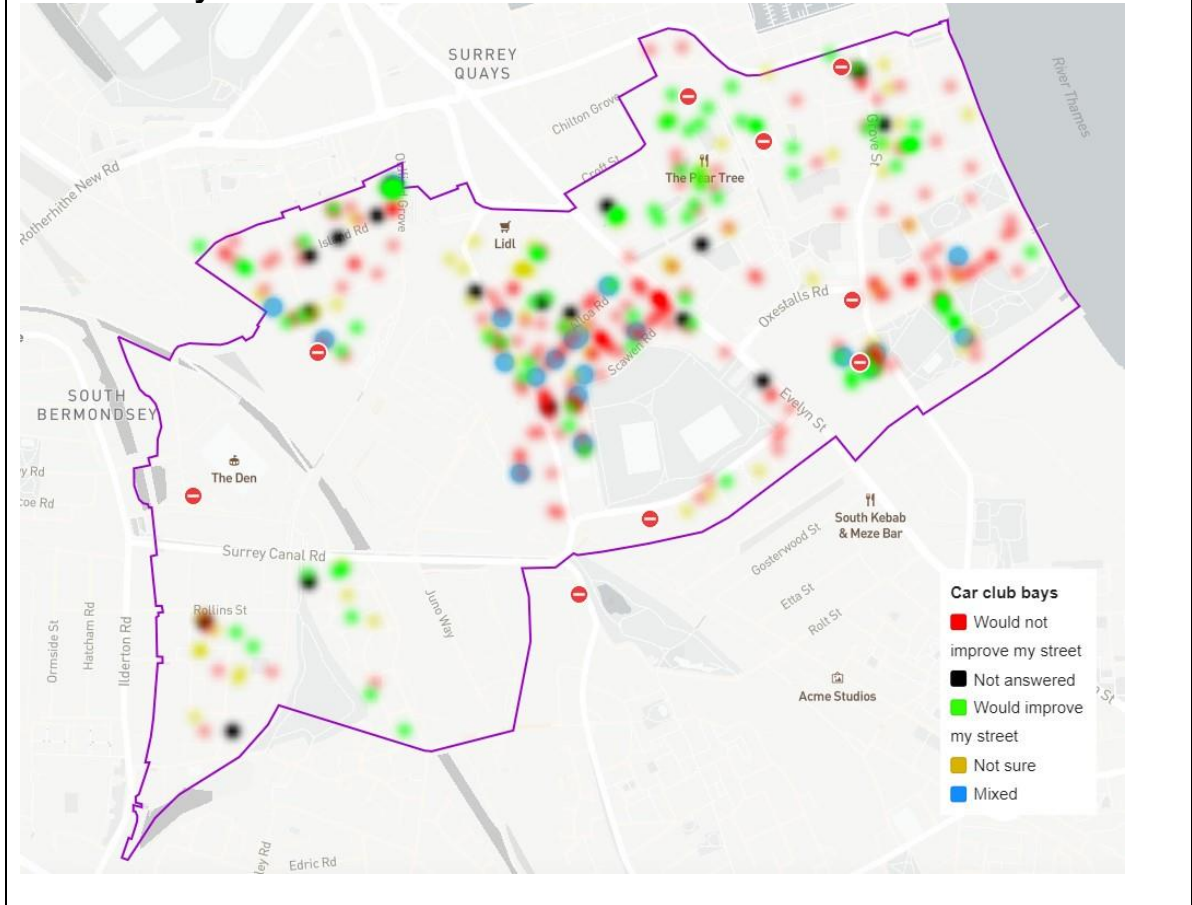
EV charging points



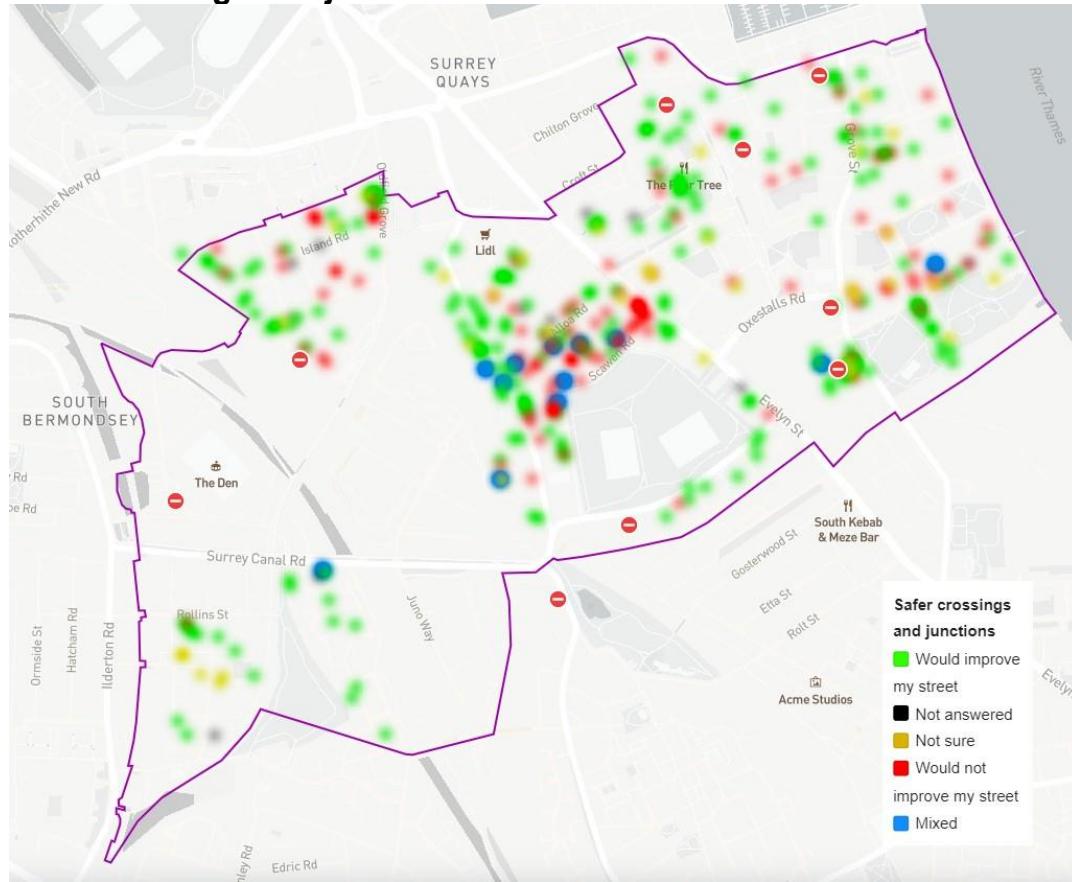
Disabled parking bays



Car club bays



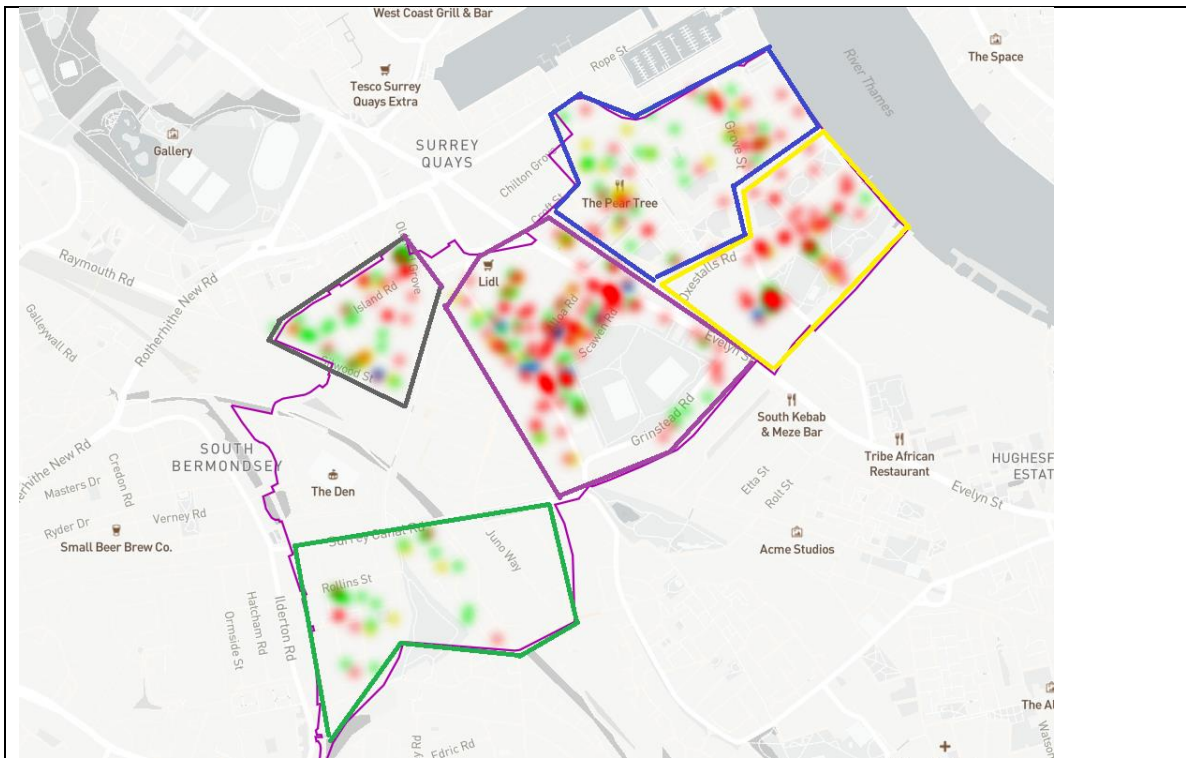
Safer crossings and junctions



Parking problems



This table indicates the type of problems that respondents indicated they experienced in their streets.



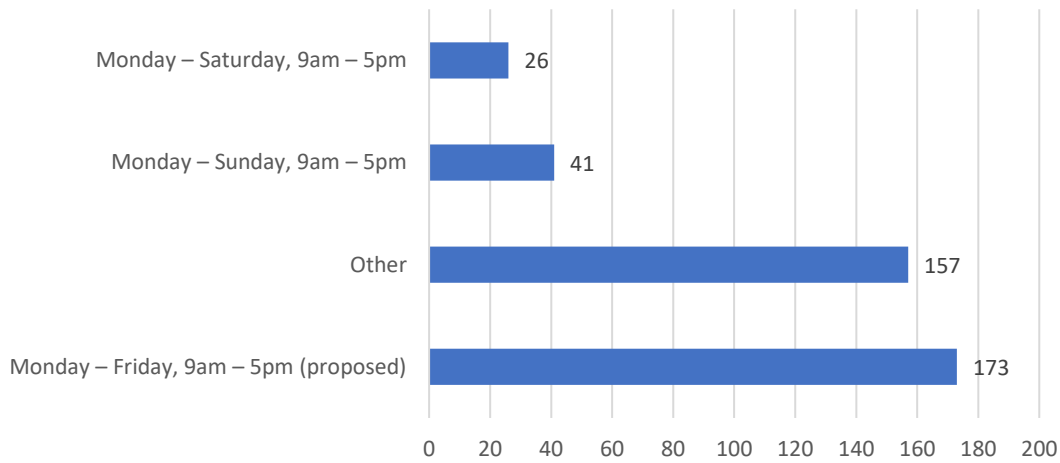
The image above shows in-depth analysis of the parking permit proposal. Areas where respondents indicated that permit parking would improve their streets were identified and are highlighted in the table below.

Intro to parking permits	Would not improve my street	Would improve my street	Not sure	Mixed
Deptford Park area	96 (64%)	31 (21%)	15 (10%)	8 (5%)
Grand Canal Ave / North of Grove Street	35 (47%)	24 (32%)	16 (21%)	0%
Silwood Estate / Island Road area	21 (39%)	23 (43%)	8 (15%)	2 (4%)
South of Surrey Canal Road	7 (26%)	16 (59%)	4 (15%)	0%
Pepys Park / South of Grove Street area	50 (77%)	10 (15%)	5 (7%)	2 (3%)

Preferred parking permit operation

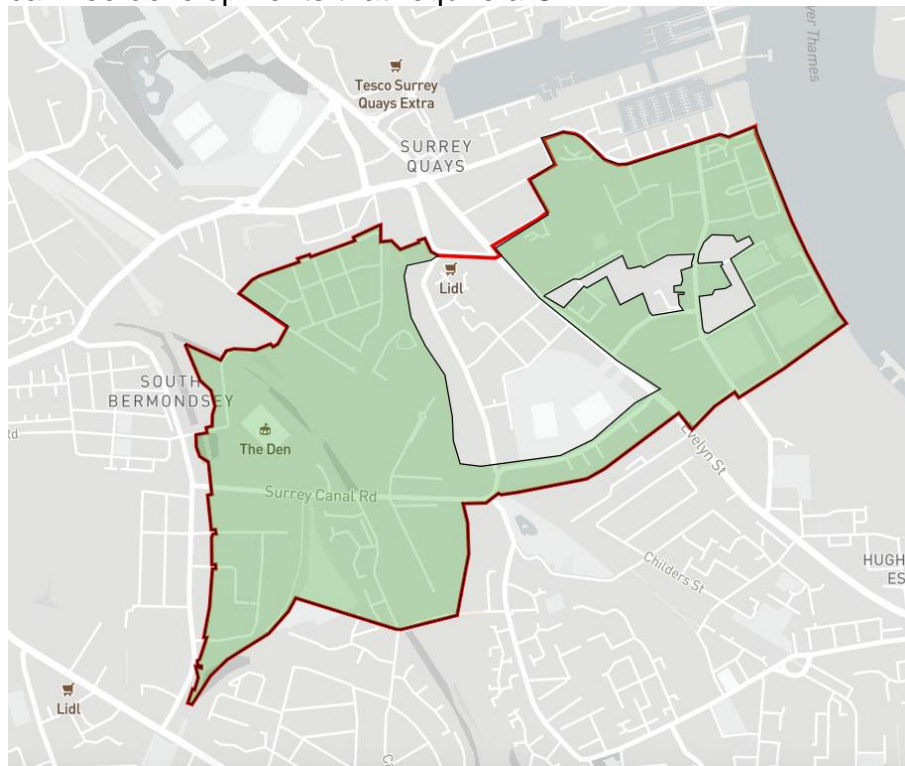
The graph below indicates preferred operation of a parking permit scheme.

We're proposing the permit scheme in Evelyn operates Monday to Friday, 9am – 5pm, which will be the same time as Deptford. If a parking permit scheme is introduced in your street, what days and times do you think it should operate?



Proposed Sustainable Streets zone

Below is a map of the proposed zone for Evelyn and New Cross Gate, based on the distribution of support for the measures and information about the locations of car-free developments that require a CPZ.



5. Impact summary

Any sustainable transport and parking improvements will impact all groups positively overall including those that may traditionally suffer from inequalities such as children, young adults, disabled people, pregnant women and young mothers, members of the LGBT community and BAME groups.

Protected characteristics

Age

Sustainable transport improvements do not discriminate against a person because of their age and is neutral in most cases. There is a potential negative impact on the very elderly or infirm if they rely on transport choices that are less sustainable.

The Lewisham Borough Ward Profiles reported that 5.3% of Evelyn residents and 5.9% of New Cross Gate residents were aged 65 and over.

Disability

Data from the Ward Profiles show that 6.1% of Evelyn residents and 6.7% of New Cross Gate residents had a long term health problem or disability limiting their day-to-day activities a lot compared to a Lewisham average of 7% and a national average of 8.3%.

The proposals have the potential to negatively impact on residents with this particular characteristic who are reliant on private cars for most of their transport needs.

It should be noted that not all people with disabilities have mobility issues. In addition, [research by TfL](#) shows that modes of transport used at least once a week for disabled Londoners was:

- Walking (81%)
- Bus (58%)
- Car as a passenger (42%)
- Car as a driver (24%)

Furthermore:

- 52% of disabled Londoners do not have access to a car compared to 34% of non-disabled Londoners ([Travel in London, TfL 2019](#))
- 17% of disabled Londoners sometimes use a cycle to get around London, compared to 18% for non-disabled Londoners ([Travel in London, TfL 2019](#))
- 75% of disabled cyclists find cycling easier than walking ([Assessing the needs and experienced of disabled cyclists, Wheels for Wellbeing 2019](#))
- 81% of Londoners are able to ride a cycle, including 76% of disabled people (Cycling action plan 2, TfL 2023)

Gender reassignment

The impact of sustainable transport improvements on an individual transitioning from one sex to another is neutral.

Marriage and civil partnership

The impact on individuals married or in a civil partnership is neutral.

Pregnancy and maternity

The impact of sustainable transport improvements on women who are pregnant or on maternity leave is neutral.

Race

The impact of sustainable transport improvements on a group of people defined by their race or ethnicity is positive.

A 2021 study by the charity Living Streets on Road Traffic and Injury Risk in Ethnic Minority Populations 'revealed that deprived ethnic minority pedestrians are over three times more likely to be a casualty on Britain's roads than white non-deprived pedestrians. The findings show that deprivations plays a significant role in the likelihood of a pedestrian being injured in a collision, and that being from an ethnic minority plays an additional part.'

An earlier report in 2007 by the London Road Safety Unit titled Road Safety of London's Black and Asian Minority Ethnic Groups also found that 'black Londoners have been on average 1.3 times more likely to be injured on the roads than white Londoners.' As the measures as a part of the programme will help improve road safety, particularly making improvements at desired crossing points, the overall impact of the proposals on race will be positive.

Religion and belief

The impact of sustainable transport improvements on a person's religion, belief or lack of belief is neutral.

Sex

The impact of sustainable transport improvements on a person's sex is neutral.

Sexual orientation

The impact of sustainable transport improvements on whether a person's sexual attraction towards their own sex, the opposite sex or both sexes is neutral.

Lewisham equality objectives

The 5 Lewisham equality objectives:

1. To ensure equal opportunities for marginalised and seldom heard communities.

It was made certain during the consultation that marginalised communities were given every opportunity to have their voices heard and contribute positively to the outcomes of the process as per section 3 – Inclusive communications and engagement.

2. To reduce the number of vulnerable people in the borough by tackling socio-economic inequality.

A project of this type for sustainable transport options to be introduced does not address the aim of reducing the number of vulnerable people in the borough, but does provide mitigating measures to alleviate financial burden buy offering

discounted parking permits in the first year and an emissions based charging policy.

3. To improve the quality of life of residents by tackling preventable illnesses and diseases.

Air pollution and physical inactivity contribute significantly to ill health in Lewisham. Changing travel habits to encourage more walking and cycling improves a person's health and wellbeing. Exposure to air pollution is linked to asthma, cardiovascular disease, Chronic Obstructive Pulmonary Disease (COPD) and neurological impairments. In 2018/19, 5.3% of people living in Lewisham had asthma, which is above the London average. Reducing the amount of pollution from vehicles powered by an internal combustion engine has a measurably positive effect by reducing the amount of carbon dioxide and particulate matter in the atmosphere. Of children aged 10-11 years in the borough, almost 25% are identified as obese and over 37% live with excess weight, higher than the average figures in England. In addition, more than 25% of adults in Lewisham and 50% of children in London fail to meet the recommended daily levels of exercise. Creating more attractive environments for walking and cycling and providing access to sustainable transport can increase levels of physical activity.

4. To ensure that services are designed and delivered to meet the needs of Lewisham's diverse population.

The proposals for sustainable transport measures aims to provide travel options for all those impacted giving them the opportunity to have their say and influence the outcome of the design. Car ownership varies across the borough: looking at the wards included by the proposed zones, 61.5% of households in Evelyn and 60.3% of households in New Cross Gate do not own a vehicle. Roads are used by all residents and the measures proposed as part of the Sustainable Streets programme are designed to improve the public realm and meet the needs of all road users, including pedestrians, cyclists and drivers.

5. To increase the number of people we support to become active citizens.

The sustainable transport proposals encourage a more active lifestyle by providing cycle parking, promoting walking, reducing polluting vehicles, and providing more trees to improve air quality and create more attractive environments for walking and cycling.

Health

The sustainable transport improvements will enable residents and visitors to make more sustainable and healthier travel choices through the provision of facilities such as cycle hangars and safer crossing points. Parking zones can also encourage people to think about how they travel to an area, particularly for work. Residents can find themselves driving round nearby streets trying to find somewhere to park as the spaces around their property are taken up by vehicles used by people that do not live in the area. This can cause frustration and impact on when residents choose to use their vehicles. Introducing restrictions that increase the likelihood of residents being able to park when they need to may help improve some residents' mental health and quality of life.

Equality & Diversity

The proposal may benefit those who report being uncomfortable with parking some distance from their homes and walking back (particularly in the dark) as availability of parking spaces should be improved. This concern is often reported by young females and older people but can include those within certain sexual orientation and gender reassignment groups. Parking restrictions such as double yellow lines on the corners of junctions aim to improve visibility for all pedestrians and approaching traffic, but this will see the greatest benefit for younger pedestrians and some disabled groups.

Environment & Climate Change

Sustainable transport and parking improvements may reduce the appeal of travelling by private car and therefore encourage residents and visitors to consider more sustainable alternatives. A parking zone would also help reduce carbon emissions by enabling residents to park more easily, with them no longer needing to drive around looking for an available space. An emissions-based pricing system will encourage residents to own more efficient vehicles. Parking restrictions can encourage commuters and local employees to consider alternative ways of getting to work, as anyone driving to work by car has an impact on parking availability, traffic congestion and air quality. The introduction of restrictions is often the push to make people think about how they travel to a location and can lead to quieter streets.

Road Safety

High levels of congestion are linked to increased risk of road danger. Between 2017-2021 there were more than 4,000 casualties as a result of traffic collisions in Lewisham, of which 21 were fatal. High priority interventions suggested to help reduce collisions include lowering speeds to 20mph; introducing measures to reduce the dominance of traffic; and designing streets with safety in mind that encourages ways of travel which pose less risk to other people on the roads, e.g. new or upgraded high-quality cycling routes and infrastructure to make walking safer, easier and more accessible for all. Waiting restrictions have been considered as a part of the improvements and these can have a positive impact on road safety if introduced at locations such as junctions and bends. Parking bays can also be designed in such a way as to act as traffic calming measures. Restrictions can also be introduced at or near to desired crossing points improving the visibility of pedestrians and approaching traffic.

Negative Impacts

Sustainable transport and parking improvements have the potential to negatively impact on those who require a motor vehicle to visit an area with additional parking restrictions or parking space being re-allocated for uses such as bike hangars. The risk is greater for those registered as disabled or those supporting or caring for a relative or friend with a disability in the area. The introduction of permit parking in an area residents could previously park for free may negatively impact on certain groups, particularly those on lower incomes.

6. Mitigation

Mitigations for registered disabled residents and visitors would mean that those with these protected characteristics would be significantly alleviated. Lewisham-issued Blue Badge holders are eligible to apply for a resident permit free of

charge and the parking controls may enable them to park closer to their destination.

The Parking Policy has been updated to amend the blue badge policy, enabling Lewisham Blue Badge holders to also park within any CPZ in the borough, mitigating the impact of these measures further.

Lewisham Blue Badge holders who rely on regular visits to receive constant help and care may apply for a free carer permit. This is offered to residents who meet the criteria and the permit entitles the parking of carer's vehicles for those residents living within a CPZ.

This will also help mitigate some negative impacts on elderly residents that might require care. Residents will also be able to purchase visitor permits to allow their visitors to park within any proposed parking zone. Visitors will be able to park for free outside of the hours of operation of any parking controls.

The impact is neutral given the mitigation in place for disabled badge holders and the elderly who will be entitled to a parking permit free of charge. Disabled residents can also request a disabled parking space, which should enable them to park closer to their property and visitors with a Lewisham registered blue badge will be able to park within a resident's bay. Again, the free carer's permits also help mitigate the negative impacts.

More information can be found in the Council's Parking Policy.

Residents that use a vehicle for work may be negatively impacted. For all new CPZs, the Council will offer residents and businesses a 15% discount on the cost of a permit for the first year. This will also allow them time to change their vehicle to a more efficient one to take advantage of the emissions-based permit pricing.

The Council has also introduced monthly subscription payments to assist with payment. The average resident parking permit will cost between £8.15-£9.20 per month. This helps mitigate some of the negative impacts on low-income residents.

In addition, the programme will seek to reduce pavement parking where possible, improve safer crossing points at junctions and declutter roads to improve pedestrianisation (including for wheelchair users), which will help to mitigate impacts on the elderly or inform.

7. Service user journey that this decision or project impacts

For further information

[Lewisham Council - Parking](#)

[Lewisham Council - How our new parking policy has affected parking permit prices](#)

[Lewisham Council - New parking permit system](#)

[Lewisham Council - Parking permits for controlled parking zones](#)

[Lewisham Council - Blue Badge disabled parking](#)

[Lewisham Council - Parking reports and policies](#)

[Lewisham Council - Corporate complaints procedure](#)

Signature of Director

