

EQUALITY IMPACT ASSESSMENT

The **Equality Act 2010** places a '**General Duty**' on all public bodies to have '**due regard**' to the need to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity for those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them.

This is known as the **Public Sector Equality Duty**.

In addition, the Council complies with the Marriage (Same Sex Couples) Act 2013.

Section 1: Responsibility for the Equality Impact Assessment

Name of proposal:	Haringey Climate Change Action Plan
Service area:	Carbon Management
Officer completing assessment:	Joe Baker / Suzanne Kimman
Equalities/ HR Advisor:	Hugh Smith
Cabinet meeting date:	March 2020
Director/Assistant Director:	Dan Hawthorn / Emma Williamson

Section 2: Summary of the proposal

Please outline in no more than 3 paragraphs the proposal which is being assessed, the key stakeholders who may be affected by the policy or proposal, and the decision-making route being taken.

The proposed decision is to agree a draft Climate Change Action Plan for Haringey. The Plan sets out a set of detailed and deliverable actions to deliver a net zero-carbon borough by 2041.

The key stakeholders are Haringey residents and businesses. Those who are more vulnerable to the effects of climate change will be most impacted if this Action Plan is not fully implemented, such as people in uninsulated homes (overheating) or people with ground floor habitable rooms (flooding). Those who are likely to be impacted by measures in the Action Plan due to their personal circumstances may include households who have a particular housing status, do not have sufficient funds to support the carbon reductions required in private households or businesses or who travel by more polluting transport modes out of necessity.

The draft Action Plan is being presented to Cabinet in March 2020.

Section 3: What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis. Please include any gaps and how you will address these

This could include, for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national.

Sex

Service users: There is no national or regional data available relating directly to fuel poverty. Haringey borough profile data has been utilised.

Gender Reassignment

Service users: There is no national or regional data available relating directly to fuel poverty. Haringey borough profile data has been utilised.

Age

Service users: BEIS Fuel poverty statistics Haringey Borough Profile.

Disability

Service users: Haringey Borough profile and Institute for Fiscal Studies (2018), 'Living standards, poverty and inequality in the UK: 2018'.

Staff: Haringey Corporate Employment Profile, [September 2019](#).

Race & Ethnicity

Service users: Haringey Borough Profile BEIS Ethnicity facts and figures Fuel Poverty data

Sexual Orientation

Service users: There is no national or regional data available relating directly to fuel poverty. Haringey borough profile data has been utilised.

Religion or Belief (or No Belief)

Service users: There is no national or regional data available relating directly to fuel poverty. Haringey borough profile data has been utilised.

Pregnancy & Maternity

Service users: There is no national or regional data available relating directly to fuel poverty. Haringey borough profile data has been utilised.

Marriage and Civil Partnership

There is no national or regional data available relating directly to fuel poverty. Haringey borough profile data has been utilised.

Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?

Explain how you will overcome this within the proposal.

Climate Change

This Action Plan aims to reduce carbon emissions in the borough, but it is dependent on carbon emissions being reduced worldwide to decelerate the rate of the changing climate. The Action Plan seeks to mitigate rising temperatures in the summer and the increase of extreme weather events. It will protect residents and businesses from increasing energy costs. Efforts need to be made to realise the local benefits of reducing emissions such as improving the quality of housing, improving air quality in poorer areas and reduce isolation currently experienced in car-dominated housing estates (such as Northumberland Park Estate).

Climate impacts and extreme weather events can affect anyone, but some people are more likely to be affected than others. Factors such as age and health can directly increase vulnerability to a changing climate. Social and economic inequalities can predispose groups to living in circumstances where they are more vulnerable to the effects of climate change (e.g. living in areas with high air pollution or flood risk).

Environmental Inequalities

A changing climate can affect communities in different ways.

Age

Haringey has a relatively large child population with 20% of the population being under 16 years old. Over two thirds of the Haringey population are of working age (70.1%). However, the action plan acknowledges that older people are adversely affected by living in cold homes and looks to source funding to reduce demands on the health services. The 'depth' of fuel poverty increases with age, with those households where the oldest person is aged 60+ having the largest fuel poverty gap (BEIS 2016 / Annual Fuel Poverty Statistics 2015, DECC).

- Young and old people are less resilient to extreme weather, such as extreme hot, cold and windy weather
- Young and old people are more vulnerable to fuel poverty
- Young and old people are more vulnerable to air pollution, as noted in the EqIA for Haringey's Air Quality Action Plan
- Young people will benefit from energy improvements to schools
- Older people may be perceived to have less access to cycle infrastructure improvements but will benefit from wider active travel improvements
- As ill health is more prevalent in older age the older population are more likely to benefit from carbon reduction strategies (lower air pollution, thermal comfort, lower energy bills, better public realm).

Gender reassignment

There is very little robust data on Haringey or the UK's trans population. However, it is estimated that there are between 200,000 and 500,000 people who identify as trans in the UK. According to the LGBT Survey 2018, younger trans people are more likely to identify as non-binary, with 57% of all trans respondents aged under 35 identifying as non-binary. The age at which transitioning is started tends to be younger, with 81% of people starting transitioning at 34 or younger, compared to 19% transitioning at 35 and over. Of those who identify as trans in the UK the largest group are of White ethnicity, representing 90% of this group. Trans people report

lower levels of pay and a lower likelihood of having been in paid work and these individuals will benefit from measures proposed within the strategy.

- There is no reason to believe that there are specific impacts for this protected group and we will try to ensure that discrimination, harassment, and victimisation is tackled based on this and any other protected group when the Council interacts with this group through engagement activities and home visits.

Sex

With a greater number of women in the age 50+ group, and as the elderly are more likely to be affected issues such as fuel poverty, women are disproportionately affected by fuel poverty. The impact of air quality also appears to be larger on males in adulthood, with Haringey's under 75 mortality rate from respiratory disease higher among males than females (35.5 per 100,000 residents, compared to 18.2 for females) (Public Health Outcomes Framework, 2015-17).

- Older women may be more vulnerable to negative health impacts from air pollution, extreme weather events, access to health services during storms.

Disability

Research has found that people living with a long-term condition aged 24-54 are 50 per cent more likely to be living in poverty than their able-bodied peers (Living standards, poverty and inequality in the UK, Institute for Fiscal Studies 2018). Over 19,500 people aged 16 to 64 in Haringey have a physical disability; this equates to approximately 10% of the population aged 16-64. 4,500 people have a serious physical disability; 15,700 adults have a moderate or severe hearing impairment; and almost 5,000 people have sight loss which impacts on daily life.

- People with long-term health conditions may be less resilient to extreme weather
- People with disabilities on fixed incomes may be more vulnerable to fuel poverty
- People with long-term health conditions are more vulnerable to the negative health effects of air pollution, as noted in the EqIA of Haringey's Air Quality Action Plan
- People with disabilities may continue to require private vehicle-based transport methods for travel requirements

Race/Ethnicity

In 2017, 10.9% of all households in England (2.53 million households) were in fuel poverty. In every year from 2003 to 2017, households in the White ethnic group were less likely to be in fuel poverty than those from the other ethnic groups (made up of all other ethnic groups combined). The Action Plan will therefore have a positive impact on non-white groups as these groups will benefit most from retrofit interventions and measures.

Across the country BAME households are disproportionately affected by an increase in statutory homelessness across the country. Among white households, homelessness increased by 9% between 2012 and 2017, while it increased by 48% among BAME households during the same time period.

BAME communities also tend to live in Haringey neighbourhoods that are more vulnerable to the causes and effects of climate change, such as air pollution, flooding, and extreme weather. Wards in which a larger BAME community lives include Bruce Grove (56%), Northumberland Park (61%), Tottenham Green (53%), Tottenham Hale (57%) and White Hart Lane (52%). These wards also see the

highest amount of air pollution, with the largest air quality focus areas set around Tottenham High Road, Seven Sisters Road, Wood Green High Road; these areas have annual mean NO₂ concentrations above 80 µg/m³.

Sexual orientation

3.6% of residents in Haringey identify as Gay, Lesbian, Bisexual or another non-Heterosexual sexuality. Within this group just over half identify as Gay or Lesbian, just over one in four identify as Bisexual, and around one in seven identify as 'Other'.

- The LGBTQ+ community is over-represented in the young homeless population, 24% nationally, often due to prior experiences of familial rejection and abuse (Albert Kennedy Trust 2017). This group will be more vulnerable to the effects of climate change through extreme weather events or flooding.
- There is no reason to believe that there are specific impacts for the wider protected group and we will try to ensure that discrimination, harassment, and victimisation is tackled based on this and any other protected group when the Council interacts with this group through engagement activities and home visits.

Religion/Faith

Christian residents make up the predominant group in all tenure types and are broadly as likely to social rent as they are to private rent or be owner occupiers. Those of no religion and Jewish residents are more likely to be homeowners. Muslim residents are over-represented in the social rented market (which includes both council housing and housing association stock) and under-represented as homeowners. Alongside this regional and national data suggests that Muslim residents are more likely to have no qualifications and less likely to earn LLW; with Buddhist and Muslim residents most likely to be unemployed.

Minority faith communities tend to live in Haringey neighbourhoods that are more vulnerable to the causes and effects of climate change, such as air pollution, flooding, and extreme weather. In Haringey, residents with no faith are more likely to live in the west of the borough (such as Stroud Green, Crouch End, Muswell Hill and Alexandra wards), and those with a religious belief are more likely to live in the east (with lowest group with no faith of 13% in White Hart Lane and Northumberland Park). 98% or more of all homes in the west of the borough have good access to nature, compared to an average of 69% of homes in the east (Haringey Ward Profiles 2017; Access to public open space and nature by ward, Greenspace Information for Greater London). This suggests that residents who have a religious belief are less likely to have access to green spaces and nature; these areas will see less impacts of flooding, air pollution and heat waves.

Pregnancy/maternity

Northumberland Park has the highest birth rate, at 83 births per 1,000 women aged 15 to 44. The lowest birth rate was in Muswell Hill. There is no known data on pregnancy and maternity relating to Housing and Place or fuel poverty.

- Pregnant women may be more vulnerable to negative health impacts associated with climate change. The negative health impacts of air pollution for pregnant women are noted in the EqIA for Haringey's Air Quality Action Plan.

Marriage/civil partnership

According to the 2011 census, 1,191 residents were in a same-sex civil partnership and 33.3% of residents aged over 16 are married (ONS Census 2011). The data we hold across the key Borough Plan areas of Housing, People, Place, Economy and Your Council do not indicate any inequalities in the area of Marriage & Civil Partnership.

- We will continue to fulfil our commitments against this protected characteristic, and if any inequalities in this area emerge, we will take the necessary steps to address them.

Climate Change Action Plan

The objective of the Climate Change Action Plan is to reduce carbon emissions in Haringey and thereby mitigate the extent of climate change and its impact on Haringey. A large number of actions relate to the following policy areas and can therefore be expected to affect specific groups of Haringey residents:

Haringey Council Buildings

- Haringey Council staff are likely to be affected by actions that relate to Council buildings. In particular, members of staff with disabilities are likely to be affected by actions relating to staff parking. The most recent employment profile shows that 6.9% of Haringey Council staff declared having a disability. However, it is not known how many of these members of staff drive or rely on staff parking.
- Children and young people, among whom BAME communities are overrepresented, are likely to be affected by actions relating to school buildings.

Housing

- In 2017 there were 15,189 households living in fuel poverty in Haringey i.e. 14.5% of the households in the borough. This is the 4th highest percentage in London and substantially above the London average (11.8%) (BEIS Fuel poverty sub-regional statistics 2017).
- Properties at most risk of fuel poverty are those (BEIS Fuel poverty sub-regional statistics 2017):
 - with an energy performance certificate (EPC) rating of E, F or G.
 - built pre-1944
 - in the private rented sector
 - fitted with an electricity pre-payment meter.
- Properties at most risk of overheating are:
 - Converted flats or newly built blocks of flats
 - Flats facing east/west/south and with a single aspect
- In both situations the households most at risk include those with:
 - low incomes.
 - elderly occupants
 - children under the age of 16.
 - disabilities or suffering from a long-term illness, and,
 - those confined to home during long periods of the day.
- Fuel poverty is measured by the Low-Income High Cost indicator. This ensures that residents qualify for support based on the energy efficiency of their home and their income. Use of property Energy Performance Certificate data will ensure that targeting covers anyone affected by fuel poverty, regardless of tenure, to improve the

energy efficiency of their home, reduce the price they pay for energy and to refer them to support services specific to their needs.

- Social housing tenants in Haringey are likely to be affected by a number of the actions in the Climate Change Action Plan. In summary, women, older people, BAME communities, lone parent households, minority faith communities, and individuals with disabilities and/or long-term health conditions are overrepresented among social housing tenants relative to the population of the borough.
- Private-rented sector tenants are likely to be affected by a number of the actions. In summary, younger people, those with disabilities, lone parents, and BAME communities are over-represented among PRS tenants.

At LSOA level, the proportion of households in fuel poverty is highest in the east of the borough particularly Noel Park and Bruce Grove wards. There are no LSOAs in the west of the borough within the top quartile (greater than 16.8%). This is shown in figure 1.

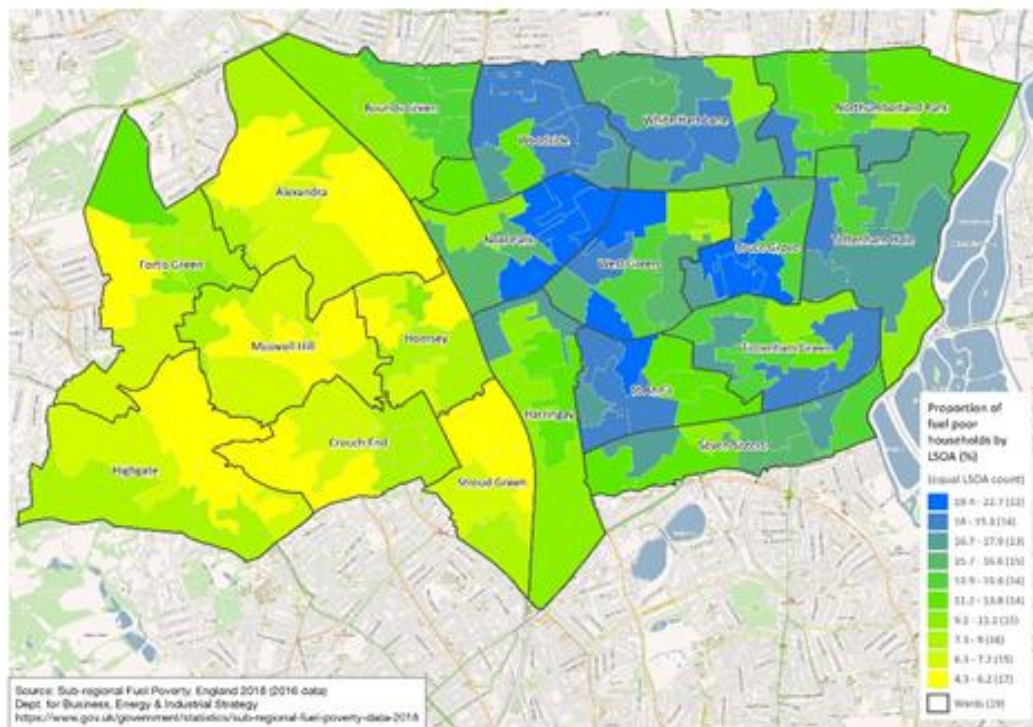


Figure 1. above shows the wards and the numbers of households in fuel poverty. It shows that homes in the west are less likely to be fuel poverty. The wards of Noel Park and Bruce Grove are particularly affected by high numbers of homes in Fuel Poverty.

- The Action Plan promotes people-centred solutions to carbon reduction which could reduce inequality and promote fairness in the borough. It sets out to ensure that assistance schemes are communicated to all areas of the community with specific reference to groups who share the protected characteristics. This may include sections of the population that are not engaged fully in an active participatory citizenship process and fail to access services, either through choice, or the design of the engagement process.

Transport

We know that certain transport inequalities exist in Haringey. In summary, measures to promote active travel and improve air quality have potential to reduce inequalities that affect protected groups including children and young people and BAME communities. However, some groups may not be able to benefit from engaging in active travel, including people with mobility-related disabilities, some older people, young children and their carers, and pregnant women. These groups may be negatively impacted by reduction in private car use. All groups will benefit from improvements in public transport. The Action Plan will not promote a complete ban on the car due to the inequalities that exist.

4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

Please outline which groups you may target and how you will have targeted them.

The Climate Change Action Plan came out of the Haringey Zero by 2050 Commission, which published a report of its findings in October 2017. A group of built environment experts undertook a series of workshops, study tours and review sessions to inform the vision of a sustainable future they set for Haringey. After ARUP was appointed to undertake the technical-based work to reach to zero carbon by 2050, the Commission and key members of sustainable community groups commented on the proposed route map and actions.

This consultation did not consult with any protected groups in a targeted way, but those groups that were consulted include individuals who share the protected characteristics.

The draft Action Plan presented for approval here will be the subject of further structured engagement with residents and other stakeholders before a final plan is adopted later in 2020. This engagement programme will include targeted initiatives for specific sections of the community; proposals for this engagement exercise are described further in the main cabinet report.

4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

Explain how will the consultation's findings will shape and inform your proposal and the decision making process, and any modifications made?

Feedback from the community has been to build on existing successes from carbon reduction projects, as recorded in Annual Carbon Reports. Over half of energy community grants were awarded to communities of which a majority people have a 'relevant protected characteristic'.

The forthcoming engagement work will help to further inform the final Action Plan proposed for adoption later in 2020.

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.

5.1. Sex: Positive

It is anticipated that there will be a higher take-up of active travel among women, who are currently underrepresented among cyclists and will feel more confident to cycle as a result of infrastructure improvements.

Insulating homes better will improve thermal comfort for women who are more likely to be sensitive to higher and lower temperatures, and particularly experience more discomfort than men in cooler conditions ('Thermal comfort and gender: a literature review, S. Karjalainen 2011).

Better access to a skills programme will enable more women to skill up in the carbon reduction sector.

5.2. Gender Reassignment: Unknown

Our findings do not lead us to believe that there will be specific impacts for this protected group, but we will ensure that this group is not subjected to discrimination, harassment, and/or victimisation due to their protected characteristic with the necessary training for frontline staff. If any inequity in treatment is identified, we will take steps to rectify this. All communications will ensure that this community is not excluded, and that the Council will work with installers to that the installers understand this groups needs and sensitivities.

5.3. Age: Positive

Our analysis indicates that young and older people are more vulnerable than working age people to the negative health impacts of climate change. The Action Plan will result in positive health outcomes for older and younger people from lower air pollution, insulated homes, and more active travel.

5.4. Disability: Positive

It is anticipated that there will be positive health outcomes for individuals with disabilities from reduced car journeys and lower air pollution. Better public highways infrastructure will deliver wider and more accessible pavements and higher quality public realm, providing better access to amenities for some individuals with disabilities.

There is likely to be a positive impact for individuals with disabilities in terms of thermal comfort and reduced bills from retrofitted social housing.

There may be negative impacts from reduced parking availability overall, although blue badge parking will remain and will be prioritised for retention. The reduction in parking overall is a proportionate means to achieve a legitimate aim, namely reductions in air pollution and carbon emissions, with positive benefits for this group and greater benefits for other protected groups.

Households with one or more members with a physical or mental disability are likely to be more impacted by retrofit works to be undertaken in homes. Strategies are being put in place to prioritise works to be undertaken on the outside of homes rather than inside, and where necessary, solutions will be sought to reduce the impact of retrofit works on those whose disabilities cause them to need to continue living in the home.

The Action Plan sets out an ambition to improve the energy efficiency of all households. It also aims to ensure all residents have access to cheaper energy tariffs. This will improve the comfort of disabled residents, many of whom spend long periods of the day at home, whilst reducing energy bills.

5.5. Race and Ethnicity: Positive

BAME communities are overrepresented in social housing and the PRS. The Action Plan will result in improved social housing for these communities and reduce fuel poverty.

The eligibility criteria for any fuel poverty initiatives undertaken as a result of this strategy will not be based on race. However non-white ethnic residents are more likely to be in fuel poverty. Improving the energy efficiency, reducing damp and mould and improving the comfort of a home will have a positive impact on any home affected by fuel poverty.

5.6. Sexual Orientation: Neutral

Our findings do not lead us to believe that there will be specific impacts for this protected group, but we will ensure that this group is not subjected to discrimination, harassment, and/or victimisation due to their protected characteristic with the necessary training for frontline staff. If any inequity in treatment is identified, we will take steps to rectify this. All delivery mechanisms and communications led by the Council and partner organisations will be designed to ensure that the needs of the LGBT community are reflected so that delivery agents, such as installers, reflect the needs and sensitivities of this community.

5.7. Religion or belief or no belief: Neutral

Our findings do not lead us to believe that there will be specific impacts for this protected group, but we will ensure that this group is not subjected to discrimination, harassment, and/or victimisation due to their protected characteristic with the necessary training for frontline staff. If any inequity in treatment is identified, we will take steps to rectify this.

Improving the energy efficiency, reducing damp and mould and improving the comfort of a home will have a positive impact on any home affected by fuel poverty. This will be particularly important to those who are unemployed or on low incomes, and the evidence indicates that Muslim and Buddhist households are more likely to be unemployed.

5.8. Pregnancy and maternity: Positive

Pregnant women are overrepresented in social housing. The Action Plan will result in improved housing for these communities.

Some actions are fundamentally about the access to capital and single-person households may therefore have less access to funding and this will be exacerbated if the single parent has children too. Women constitute over 85% of single parents in Haringey.

5.9. Marriage and Civil Partnership: Neutral

People who are in a civil partnership will be treated the same as people who are married.

5.10 Groups that cross two or more equality strands

The Climate Change Action Plan will impact some wider socio-economic groups more than others which, in turn, may impact a few protected groups slightly more.

Levels of car ownership can be largely characterised by socio-economic background and ward. The poorest households on average live in eastern wards, tend to have good public transport accessibility levels (PTAL) despite examples of poor accessibility, have the lowest level of car ownership (most do not own a car at all), but are also exposed to the highest level of traffic and air pollution. The highest levels of car ownership are in western wards with lower PTAL.

- Raising parking charges and removing parking spaces will therefore not impact on the poorest households financially or in access terms (where they need their cars for night shifts etc). These households will benefit from improved indoor and outdoor air quality, better public transport connections and better active travel infrastructure.
- Lower to medium income households who do own cars are likely to be impacted by a rise in parking charges and are likely not to have the capital to invest in electric cars to qualify for lower charges and no ULEZ charges. These households may include those within BAME, single parent, religious and disabled protected groups. However, the reduction in parking overall is considered on balance to be a proportionate means to achieve a legitimate aim, namely reduced air pollution and carbon emissions, with positive benefits for these groups and greater benefits for other protected groups.
- Higher income households, mostly located in the western wards, are likely to be able to afford the additional expense of parking charges on a regular basis and increases may not necessarily impact on their travel patterns. Reduced public parking spaces at local centres, amenities and public buildings may however impact on travel patterns more, which will have positive impacts on households in the borough who live close to these destinations and the road network. Behaviour change programmes

and improvements to physical active and public transport infrastructure will enable further travel mode changes to be made.

This Action Plan covers actions that are the responsibility of the Council (for council-owned properties and within the remit of council staff), the community and the Government to enable people to take action.

- Under the Housing and Energy chapters, there is an emphasis on households not living in social housing to undertake deep retrofit works to their homes, including the installation of renewable energy. Costs associated with these works will vary per building, but are expected to be significant additional expenditure. Without financial support from the Government or GLA, and/or appropriate financial structures where energy efficiency works can be linked to the building not the occupiers/owners and the pay back spread out, households will not be able to undertake these works independently. The Affordable Energy Strategy will target this specifically by providing guidance on available grants and technical assistance for the fuel poor, able-to-pay market.
- Under the Workplace chapter, businesses and industrial premises are expected to upgrade their properties to EPC B by 2035. Due to the large proportion of small to medium-sized enterprises in the borough, this cost will be more difficult to be balanced against other essential business overheads without public funding mechanisms.
- In all such cases, the occupiers will benefit from energy efficiency works to be undertaken saving the Council revenue funding which will allow more spending on other services to benefit protected groups.

With better public realm, there is more likely to be more social interaction which would lower the level of social isolation that predominantly older people feel, which in turn, could positively impact this group in terms of mental health.

Outline the overall impact of the policy for the Public Sector Equality Duty.

Could the proposal result in any direct/indirect discrimination for any group that shares the protected characteristics?

Will the proposal help to advance equality of opportunity between groups who share a protected characteristic and those who do not?

This includes:

- a) Remove or minimise disadvantage suffered by persons protected under the Equality Act
- b) Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups
- c) Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low

Will the proposal help to foster good relations between groups who share a protected characteristic and those who do not?

1. No, there will be no discrimination as a result. Projects will be delivered with this in mind. Most of the protected groups are experiencing the negative effects of climate change disproportionately due to insufficient progress reducing emissions and will benefit more from the implementation of the Climate Change Action Plan.

2. Improving energy efficiency across the housing stock will increase property values for owner-occupiers and lower energy bills for tenants and owner-occupiers so there will be more economic power in those groups. It will increase access to community infrastructure through better active travel and public transport so those who are isolated from lack of access to car will be better connected to jobs and social infrastructure.
3. Yes, through the community ownership of energy companies and behaviour change programme (play streets) interaction will increase between groups who share a relevant protected characteristic and those who do not.

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?

No major change to the proposal: No.

Adjust the proposal: Yes.

Stop and remove the proposal: No.

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty

Impact and which protected characteristics are impacted: *Active travel infrastructure is often designed with able-bodied pedestrians in mind.*

Action: Objectives C2, T2 and T3 have been changed to consider the needs to physical disabilities in improving and increasing active and accessible travel infrastructure.

Impact and which protected characteristics are impacted: *Protected groups may not be fully aware of community or government grants that are available.*

Action: We will provide community grants ensuring that protected groups are targeted as a key part of this process, and we will communicate the availability of government and GLA grants with protected groups as well.

Impact and which protected characteristics are impacted: *By discouraging car ownership across the board, there would be an impact for those in need of cars, i.e. blue badge owners.*

Action: We have amended Objectives C2 and T3 to ensure that people with disabilities are not impacted negatively by parking changes.

Please outline any areas you have identified where negative impacts will happen as a result of the proposal but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.

N/A

6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:

This will be undertaken as part of monitoring progress against the Action Plan.

7. Authorisation

Approved by:

Date: