

## General Equality Impact Assessment (EIA) – Our City Transport Plan

### 1. Assessment details

Throughout this form, 'activity' is used to refer to many different types of proposals being assessed.

Read the [EIA toolkit](#) for more information.

|  |  |
|--|--|
| <b>Name of activity or proposal being assessed:</b>  | Replacement of Local Transport Plan 4 (LTP4) with Our City Transport Plan 2035                     |
| <b>Directorate:</b>  | City Operations  |
| <b>Service:</b>  | City Infrastructure  |
| <b>Team:</b>   | Transport Policy & Strategy  |
| <b>Is this a new or existing activity?</b>   | There is existing transport policy in LTP4 but the process of writing LTP5 will be a new activity. |
| <b>Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)</b> | Yes. LTP4 and the local Cycling & Walking Infrastructure Plan (LCWIP) EIA.                         |

### 2. Contributors to the assessment (Name and Job title)

|  |   |
|--|---|
| <b>Responsible Lead Officer:</b>   | Kieran Taylor, Principal Transport Planner  |
| <b>Accountable Manager:</b>  | Laura Wells, Transport Policy Manager   |
| <b>Additional stakeholders collaborating or contributing to this assessment:</b> | Possability People – Get Involved Group (consultation workshop)<br>Brighton & Hove Older Peoples' Council (consultation response) |

### 3. About the activity

Briefly describe the purpose of the activity being assessed:

To produce a new long-term Transport Policy, which will assist the council in securing Government funding and communicate to residents, and other stakeholders what the transport needs of the city are.

Our City Transport Plan 2035 sets out the long-term strategy for the management, maintenance and improvement of the city's transport network, and a short-term implementation plan. It identifies the priorities and projects required to help people move around the city more safely, sustainably and easily.

What are the desired outcomes of the activity?

There are two desired outcomes. Firstly, the drafting and adoption of the city's main transport policy document. Secondly, that the process of drafting LTP5 involves stakeholders and that the end product has been co-produced.

Which key groups of people do you think are likely to be affected by the activity?

All residents, visitors and workers will be affected to some degree, by the transport policy that the city adopts. In terms of those with protected characteristics most impacted by changes to our streets / transport network are:

- Disabled people, because the policy concerns the layout of our streets and public realm.

- Older people (because there is a high incidence of age-related disabilities).
- Young people, who have the greatest vested interests in the policy achieving the required greenhouse gas emission reductions.

Beyond those with protected characteristics defined in law other groups affected will be:

- Those on low incomes (Socio-economic disadvantage), particularly those living in outer areas of the city.

## 4. Consultation and engagement

What consultations or engagement activities have already happened that you can use to inform this assessment?

- For example, relevant stakeholders, groups, people from within the council and externally consulted and engaged on this assessment. **If no consultation** has been done or it is not enough or in process – state this and describe your plans to address any gaps.

A Direction of Travel document for developing LTP5 was the subject of a public consultation in 2021. This was focused on setting out the challenges the city faces and developing a vision for Our city Transport Plan 2035. The results of the public consultation were reported to the Environment, Transport & Sustainability Committee in March 2022.

This initial document, and period of engagement, formed the basis of the draft version of Our City Transport Plan 2035. We conducted a 12-week public consultation on this draft policy between 18 June and 12 September 2025. The main channel for feedback was an online survey hosted on the council's consultation portal, Your Voice. The draft policy, along with supporting documents, were available to read on-line and paper copies were available in libraries or on request. We received 500 survey responses.

Our engagement activity during the consultation period consisted of:

- A week-long public exhibition at Jubilee Library.
- Seven drop-in sessions held in 6 libraries across the city.
- Five workshops held with secondary school pupils.
- Six workshops/ meetings with stakeholders, including the Transport Partnership, Local Access Forum and a Get Involved Group organised by Possibility People.

The purpose of having dedicated sessions in secondary schools was to ensure we heard from young people, who tend to be less well represented in consultation surveys.

A 90-minute workshop with a Get Involved Group, organised by Possibility People, was to ensure that the views of disabled people were also captured in the consultation. Of the 500 consultation responses there were 83 where respondents reported that they had a health issue that limited their day-to-day activities. Responses from these 83 people were analysed to see what if any differences there were from the overall responses. This was to highlight if disabled people had different priorities.

## 5. Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this activity? Consider all possible intersections. (State Yes, No, Not Applicable as appropriate)

The consultation survey on the draft version of Our City Transport Plan 2035 included questions that asked about gender, sex, age, ethnicity and disability. Equality questions were focused on legally protected characteristics that were felt to be most impacted by transport policy. To keep the survey concise, we did not ask additional questions about other categories, whether people were in the armed forces or had caring responsibilities for example.

We have also drawn on national, regional and local data that gives us an insight into the people's experience of transport. This is included in the evidence base for Our city Transport Plan 2035. This data relates to protected characteristics and socio-economic status. Data specifically on how the transport system in Brighton & Hove serves other groups, such as the homeless or armed forces personnel, is not available.

|   |     |
|---|-----|
| <b>Age</b>  | YES |
| <b>Disability and inclusive adjustments, coverage under equality act and not</b>  | YES |
| <b>Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)</b>   | YES |
| <b>Religion, Belief, Spirituality, Faith, or Atheism</b>  | NO  |
| <b>Gender Identity and Sex (including non-binary and Intersex people)</b>   | YES |
| <b>Gender Reassignment</b>  | YES |
| <b>Sexual Orientation</b>   | NO  |
| <b>Marriage and Civil Partnership</b>   | NO  |
| <b>Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)</b>                   | NO  |
| <b>Armed Forces Personnel, their families, and Veterans</b>   | NO  |
| <b>Expatriates, Migrants, Asylum Seekers, and Refugees</b>  | NO  |
| <b>Carers</b>   | NO  |
| <b>Looked after children, Care Leavers, Care and fostering experienced people</b>   | NO  |
| <b>Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)</b> | NO  |
| <b>Socio-economic Disadvantage</b>  | YES |
| <b>Homelessness and associated risk and vulnerability</b>   | NO  |
| <b>Human Rights</b>   | NO  |
| <b>Another relevant group (please specify here and add additional rows as needed)</b>   | N/A |

**Additional relevant groups that may be widely disadvantaged and have intersecting experiences that create exclusion and systemic barriers may include:**

- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy and numeracy barriers
- People on a low income and people living in the most deprived areas
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery
- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

If you answered “NO” to any of the above, how will you gather this data to enable improved monitoring of impact for this activity?

The answers in the table above relate to survey data recorded from the Your Voice consultation on the draft version of Our City Transport Plan 2035.

In addition to survey responses our analysis, for the evidence base of Our City Transport Plan 2035, included area-based demographic and deprivation data to identify inequalities in access to transport and inform where improvements are needed. The specific issue of access to education, for children living in the east of the city who are in a single school catchment, was raised during the consultation. School entry requirements have been amended to provide greater choice, and bus services re-organised to facilitate better access. However, there were concerns raised that the affordability of transport may impact people’s uptake of the changed school entry criteria. This can be monitored through postcode plotting of school intake.

Consultation & engagement opportunities are always promoted to a wide range of stakeholders in the city, through different means, in order to obtain a wide range of views, particularly in terms of qualitative feedback. Good relationships have been established with many groups in the city to elicit these views which are vital to feed into policies and plans.

It should be noted that the individual projects referenced in Our City Transport Plan will be subject to their own equality impact analysis. This offers further opportunities for engagement and monitoring of impacts. The 2025 refreshed Bus Service Improvement Plan involved focus groups with disabled people for example. Where an impact on a specific group from a particular project is identified (such as Armed Forces personnel, refugees, or people experiencing homelessness), their needs may be more directly addressed through delivery of these projects.

What are the arrangements you and your service have for monitoring, and reviewing the impact of this activity?

The plan contains key performance indicators and the individual projects within this plan will have their own arrangements for monitoring and reviewing their impact.

## 6. Impacts

### Advisory Note:

- **Impact:**
  - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination), and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
  - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions** mean: Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only the cumulative assessment section**.
- **Data analysis and Insights:**
  - In each protected characteristic or group, in answer to the question ‘If “YES”, what are the positive and negative disproportionate impacts?’, describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
  - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and

intersecting populations impacted by your activity, especially considering for [Health inequalities](#), review guidance and inter-related impacts, and the impact of various identities.

- For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.

- **Data Sources:**

- Consider a wide range (including but not limited to):
  - [Census](#) and [local intelligence data](#)
  - Service specific data
  - Community consultations
  - Insights from customer feedback including complaints and survey results
  - Lived experiences and qualitative data
  - [Joint Strategic Needs Assessment \(JSNA\) data](#)
  - [Health Inequalities data](#)
  - Good practice research
  - National data and reports relevant to the service
  - Workforce, leaver, and recruitment data, surveys, insights
  - Feedback from internal 'staff as residents' consultations
  - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
  - Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.

- Learn more about the [Equality Act 2010](#) and about our [Public Sector Equality Duty](#).

## 6.1 Age

|   |         |
|---|---------|
| <b>Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: those under 16, young adults, with other intersections.</b> | YES /NO |
|---|---------|

### If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Transport Policy will have a disproportionate impact on older and younger people. The outsize impact on older people stems from the high incidence of age-related disability (see section 6.2). Those over 66 are also in receipt of existing transport benefits, meaning that transport policy decisions are more likely to affect them. The council spends millions each year meeting the cost of older people's bus passes.

Older people have raised the following concerns:

- accessibility and isolation issues; many cannot rely on active travel
- long distances between bus stops, lack of seafront bus service and perceived high parking charges.
- reliance on online systems (ticketing, parking permits, bike hire) disadvantages them.
- supported healthier lifestyles and clean air but warned about unsafe pavements, shared space and the cost barriers of EVs.

The outsize impact on the young stems from the fact that the surface transport sector contributes 22% of the UK's total emissions and that decarbonising this sector will be essential to mitigating the worst impacts of climate

change. Through the Bus Service Improvement Plan under 19's also receive existing benefits in the form of subsidised fares. Decisions made regarding transport policy will also have an important impact on how accessible schools in the city are (The city has recently changed the schools admissions criteria so that up to 5% of places in each of the city's community secondary schools will now be open to pupils who live in single-school catchment areas).

Despite the considerable sums spent on fare subsidies the affordability of transport was an issue that was raised by younger people, and the general population.

## 6.2 Disability:

|   |         |
|---|---------|
| <b>Does your analysis indicate a disproportionate impact relating to <u>Disability</u>, considering our <u>anticipatory duty</u>?</b> | YES /NO |
|---|---------|

### If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Disability has a large impact on travel habits. Disabled people travel less than non-disabled people. In 2020 they made 28% fewer trips, and significantly more disabled people live in households without access to a car or van. National research, commissioned by Government, provides relevant insights into the challenges disabled people face<sup>1</sup>. Our transport policy and projects will have a disproportionate impact on this group, both positive and negative. Because of this we engaged with a Get Involved Group, organised by Possability People. The feedback we received supported findings at the national level. The needs of individual disabled people varies according to their disability. Measures we can take to improve access for one group may disadvantage others. For example level surfaces between the footway and road surface are beneficial for those in wheelchairs but can make navigating difficult for those with sight impairments who use kerbs as a guide to locate themselves.

General feedback:

- The provision of disabled parking in some key locations was not felt to be adequate. This includes the old town, where widening of pavements, has removed spaces to park on double yellow lines and where red routes have been introduced.
- Shared spaces, between cyclists and pedestrians, created a feeling of insecurity. It was felt they rely too much on social understanding; some users (cyclists, e-scooter riders) don't yield to pedestrians. This was especially the case for blind or partially sighted people.
- It was felt that there were inconsistent standards across council departments when it comes to accessibility and that there was a lack of learning from previous projects where accessible planning was not fully considered. On public transport the long gaps between bus stops on Western Road were highlighted and that there are issues with real-time tracking for certain bus services and this makes journey planning difficult.
- Consultation processes are often inaccessible, lack of notice and insufficient work done to survey opinions from people with learning disabilities — Your Voice surveys are not adequate on their own and more time and better formats are needed.
- Street clutter (like cycle parking or café/restaurants furniture) create barriers for those who rely on a kerb or building lines to navigate. Flat surfaces useful for mobility needs are difficult for blind or partially sighted people owing to use of raised curbs to navigate.

<sup>1</sup> [UK Disability Statistics: Prevalence and life experiences](#)

[Accessibility & Inclusivity of bus and coach](#)

[Disabled people's experience of rail](#)

[People with non-visible impairments' attitudes and experiences of transport qualitative research](#)

[Evaluation of the Inclusive Transport Strategy](#)

Feedback related to wheelchair users:

- Newer buses may not accommodate all wheelchair sizes, and drivers often don't wait at the raised parts of stops.
- Uneven surfaces, steep cambers (e.g. Gardner Street), and potholes on pavements are dangerous for wheelchair users. It also requires expensive maintenance of chair outside of the usual cycle regularly
- Wheelchair users end up in the road owing to pavement congestion on some streets such as Ship Street.
- The incline at the Eye Hospital makes access difficult for the mobility impaired, though benefitting the visually impaired.
- Wheelchair users reported taxi drivers avoiding pickups due to their perception it is difficult to stop or turnaround on red routes.

Feedback related to learning difficulties:

- Dotted crossings unsafe for people with learning disabilities.

What inclusive adjustments are you making for diverse disabled people impacted? For example: D/deaf, deafened, hard of hearing, blind, neurodivergent people, those with non-visible disabilities, and with access requirements that may not identify as disabled or meet the legal definition of disability, and have various intersections (Black and disabled, LGBTQIA+ and disabled).

In response to the comments raised about consistent standards across projects the revised Our City Transport Plan includes a commitment to publish an updated Streetscape Design Guide. This will set out accessibility standards for schemes. It will be developed in close consultation with disabled people. Schemes in Our City Transport Plan will be delivered in accordance with this guidance. There are schemes within Our City Transport Plan that are focused on delivering improved public realm and pavements conditions.

Red routes schemes along London Road and Lewes Road have been successful in reducing pavement parking and improving traffic flow, particularly buses. As a result, further red route schemes are being proposed. It is our existing policy that licensed Hackney Carriages and private hire vehicles can stop to drop off disabled people. This policy clearly needs to be better communicated and this is an action taken from the consultation.

### 6.3 Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers):

|  |          |
|--|----------|
| Does your analysis indicate a disproportionate impact relating to ethnicity? | YES / NO |
|--|----------|

#### If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impacts identified for this group at this time.

### 6.4 Religion, Belief, Spirituality, Faith, or Atheism:

|  |          |
|--|----------|
| Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism? | YES / NO |
|--|----------|

#### If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impacts identified for this group at this time.

#### 6.5 Gender Identity and Sex:

|   |          |
|---|----------|
| Does your analysis indicate a disproportionate impact relating to <u>Gender Identity</u> and <u>Sex</u> (including non-binary and intersex people)? | YES / NO |
|---|----------|

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impacts identified for this group at this time.

#### 6.6 Gender Reassignment:

|  |          |
|--|----------|
| Does your analysis indicate a disproportionate impact relating to <u>Gender Reassignment</u> ? | YES / NO |
|--|----------|

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impacts identified for this group at this time.

#### 6.7 Sexual Orientation:

|   |          |
|---|----------|
| Does your analysis indicate a disproportionate impact relating to <u>Sexual Orientation</u> ? | YES / NO |
|---|----------|

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impacts identified for this group at this time.

#### 6.8 Marriage and Civil Partnership:

|   |          |
|---|----------|
| Does your analysis indicate a disproportionate impact relating to <u>Marriage and Civil Partnership</u> ? | YES / NO |
|---|----------|

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impacts identified for this group at this time.

**6.9 Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum):**

|   |          |
|---|----------|
| Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)? | YES / NO |
|---|----------|

**If “YES”, what are the positive and negative disproportionate impacts?**

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impacts identified for this group at this time.

**6.10 Armed Forces Personnel, their families, and Veterans:**

|  |          |
|--|----------|
| Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans? | YES / NO |
|--|----------|

**If “YES”, what are the positive and negative disproportionate impacts?**

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impacts identified for this group at this time.

**6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:**

|  |          |
|--|----------|
| Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections) | YES / NO |
|--|----------|

**If “YES”, what are the positive and negative disproportionate impacts?**

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impacts identified for this group at this time.

**6.12 Carers:**

|   |          |
|---|----------|
| Does your analysis indicate a disproportionate impact relating to <u>Carers</u> (Especially considering for age, ethnicity, language, and various intersections). | YES / NO |
|---|----------|

**If “YES”, what are the positive and negative disproportionate impacts?**

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

As disabled people often rely on carers to drive them to essential services, carers may face similar difficulties in accessing these services along red routes, as mentioned in section 6.2.

#### 6.13 Looked after children, Care Leavers, Care and fostering experienced people:

|   |                 |
|---|-----------------|
| <p><b>Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections).</b></p> <p>Also consider our <a href="#">Corporate Parenting Responsibility</a> in connection to your activity.</p> | <b>YES / NO</b> |
|---|-----------------|

#### If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impacts identified for this group at this time.

#### 6.14 Homelessness:

|  |                 |
|--|-----------------|
| <p><b>Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)</b></p> | <b>YES / NO</b> |
|--|-----------------|

#### If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impacts identified for this group at this time.

#### 6.15 Domestic and/or Sexual Abuse and Violence Survivors, people in vulnerable situations:

|   |                 |
|---|-----------------|
| <p><b>Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?</b></p> | <b>YES / NO</b> |
|---|-----------------|

#### If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impacts identified for this group at this time.

## 6.16 Socio-economic Disadvantage:

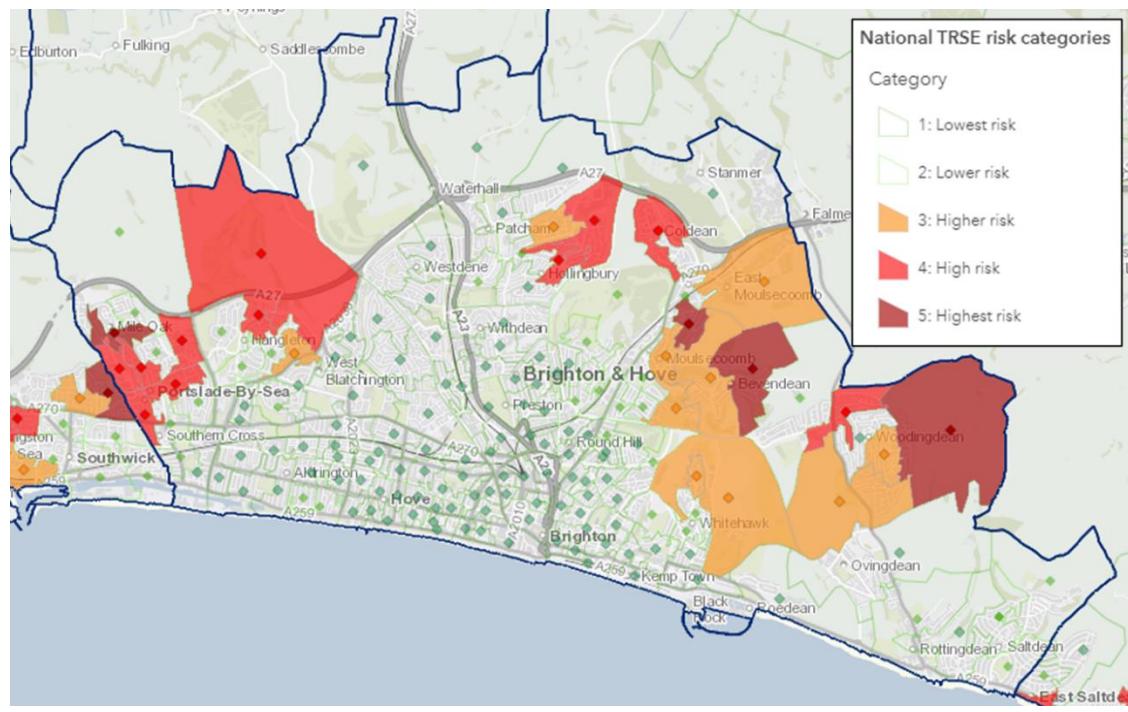
|   |          |
|---|----------|
| Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections) | YES / NO |
|---|----------|

### If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The evidence base includes an assessment of the Transport Risk of Social Exclusion. This identifies that lower income groups on the edge of the city (Woodingdean, Portslade, Bevendean, Coldean and Hollingbury) are at high risk of exclusion, because of the affordability of transport and their distance from key basic services – education, employments etc.

People living on the edges of the city requested better connectivity and more frequent bus services. The BSIP Accessibility Study has identified key areas for improvement and the [BSIP Refresh](#) includes proposals for 2025 and beyond to enhance the bus network and services, helping to reduce the risk of transport-related social exclusion in the city.



## 6.17 Human Rights:

|   |    |
|---|----|
| Will your activity have a disproportionate impact relating to Human Rights? | NO |
|---|----|

### If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impacts identified for this group at this time.

## 6.18 Cumulative, multiple intersectional, and complex impacts (including on additional relevant groups):

### What cumulative or complex impacts might the activity have on people who are members of multiple Minoritised groups?

- For example: people belonging to the Gypsy, Roma, and/or Traveller community who are also disabled, LGBTQIA+, older disabled trans and non-binary people, older Black and Racially Minoritised disabled people of faith, young autistic people.
- Also consider wider disadvantaged and intersecting experiences that create exclusion and systemic barriers:
  - People experiencing homelessness
  - People on a low income and people living in the most deprived areas
  - People facing literacy and numeracy barriers
  - Lone parents
  - People with experience of or living with addiction and/ or a substance use disorder (SUD)
  - Sex workers
  - Ex-offenders and people with unrelated convictions
  - People who have experienced female genital mutilation (FGM)
  - People who have experienced human trafficking or modern slavery

People who are members of multiple Minoritised groups may experience compounded impacts similar to those already identified for older people, young people, and disabled people. For example, those with mobility issues may face greater challenges accessing parking or public transport, while people with literacy or language barriers may find it more difficult to use online or app-based transport services. These overlapping factors can make it harder for them to travel independently or access essential services, even though the underlying barriers are shared with other groups.

An evaluation of the national [Inclusive Transport Strategy](#) spoke with participants who chose to travel by modes that were less accessible to them, because they could not afford those that were. It also highlighted that younger disabled people and those with less outwardly visible health conditions could internalise societal preconceptions about what disability looks like, and feel undeserving of extra help or adjustments.

## 7. Action planning

### What SMART actions will be taken to address the disproportionate and cumulative impacts you have identified?

- Summarise relevant SMART actions from your data insights and disproportionate impacts below for this assessment, listing appropriate activities per action as bullets. (This will help your Business Manager or Fair and Inclusive Action Plan (FIAP) Service representative to add these to the Directorate FIAP, discuss success measures and timelines with you, and monitor this EIA's progress as part of quarterly and regular internal and external auditing and monitoring)

- Feedback to the consultation showed greatest support for the objective of 'maintaining roads and managing the network efficiently' the funding to deliver this objective has been increased. Within Our City Transport Plan 2035 there is indicative funding for the coming three financial years. Funding levels will be confirmed in the transport Capital Programme, which will be published

before March 2026. This will address concerns raised about the quality of pavements and streets that disabled people raised.

- To address concerns raised by disabled people about applying consistent standards on our schemes we have committed to publish an updated Streetscape design guide. We aim to have this done by the end of 2026. We will develop this in close consultation with disabled people. The document will then be used on all schemes undertaken by the council. It will cover:
  - How the council will ensure adequate footway widths.
  - Our approach to installing street trees, greening and sustainable urban drainage.
  - Auditing the existing provision of disabled bays and yellow line parking in high demand areas.
  - The design and provision of disabled parking in transport schemes.
- To address concerns about disabled access to services and shops on red routes we will ensure that the consultation report on the Western Road Red Route sets out in greater detail how the existing policy that allows Blue Badge holders to be picked up or dropped off, so long as the vehicle is not parked, is applied. The consultation report will be published by summer 2026.
- Issues that have been raised regarding bus services, such as access to schools and provision in more outlying areas, will be monitored through the Bus Service Improvement Plan. School route bus loading can be assessed and updates provided annually alongside the key performance indicators.

### Which action plans will the identified actions be transferred to?

- For example: Team or Service Plan, Local Implementation Plan, a project plan related to this EIA, FIAP (Fair and Inclusive Action Plan) – mandatory noting of the EIA on the Directorate EIA Tracker to enable monitoring of all equalities related actions identified in this EIA. This is done as part of FIAP performance reporting and auditing. Speak to your Directorate's Business Improvement Manager (if one exists for your Directorate) or to the Head of Service/ lead who enters actions and performance updates on FIAP and seek support from your Directorate's EDI Business Partner.

The above actions will be incorporated into the service plan for Transport Projects and Engineering once it is next updated. It is anticipated that this will be done in 2026 but no firm date is set for when it will be completed. In the interim the above actions will be incorporated into the Transport Policy & Strategy (part of Transport Projects & Engineering) service plan.

## 8. Outcome of your assessment

What decision have you reached upon completing this Equality Impact Assessment? (Mark 'X' for any ONE option below)

|  |   |
|--|---|
| <b>Stop or pause</b> the activity due to unmitigable disproportionate impacts because the evidence shows bias towards one or more groups.  |   |
| <b>Adapt or change</b> the activity to eliminate or mitigate disproportionate impacts and/or bias.   |   |
| <b>Proceed with the activity as currently planned</b> – no disproportionate impacts have been identified, or impacts will be mitigated by specified SMART actions.   | X |
| <b>Proceed with caution</b> – disproportionate impacts have been identified but having considered all available options there are no other or proportionate ways to achieve the aim of the activity (for example, in extreme cases or where positive action is taken). Therefore, you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision. |   |

If your decision is to “Proceed with caution”, please provide a reasoning for this:

N/A

**Summarise your overall equality impact assessment recommendations to include in any committee papers to help guide and support councillor decision-making:**

The recommendation in the draft cabinet report is for the revised Our City Transport Plan 2035 to be adopted. The revised Our City Transport Plan 2035, attached to the report, contains the commitment to develop a Streetscape design guide and an indicative three year spending plan.

## 9. Publication

All Equality Impact Assessments will be published. If you are recommending, and choosing not to publish your EIA, please provide a reason:

N/A

## 10. Directorate and Service Approval

| Signatory:                       | Name and Job Title:                              | Date: DD-MMM-YY |
|----------------------------------|--|-----------------|
| <b>Responsible Lead Officer:</b> | Kieran Taylor, Principal Transport Planner       | 12/11/2025      |
| <b>Accountable Manager:</b>      | Laura Wells, Transport Policy & Strategy Manager | 25/11/25        |

**Notes, relevant information, and requests (if any) from Responsible Lead Officer and Accountable Manager submitting this assessment:**

[Empty box for notes]

## EDI Review, Actions, and Approval:

### Equality Impact Assessment sign-off

**EIA Reference number assigned:** DIRNAME##-DD-MMM-YY-EIA-Name

For example, HNC##-25-Dec-23-EIA-Home-Energy-Saving-Landlord-Scheme

EDI Business Partner to cross-check against aims of the equality duty, public sector duty and our civic responsibilities the activity considers and refer to relevant internal checklists and guidance prior to recommending sign-off.

Once the EDI Business Partner has considered the equalities impact to provide first level approval for by those submitting the EIA, they will get the EIA signed off and sent to the requester copying the Head of Service, Business Improvement Manager, [Equalities inbox](#), any other service colleagues as appropriate to enable EIA tracking, accountability, and saving for publishing.

| Signatory:   | Name:       | Date: DD-MMM-YY |
|--|-------------|-----------------|
| <b>EDI Business Partner:</b>   | Chris Brown | 26-Nov-2025     |
| <b>EDI Manager:</b>  |             |                 |
| <b>Head of Communities, Equality, and Third Sector (CETS) Service:</b><br><i>(For Budget EIAs/ in absence of EDI Manager/ as final approver)</i> |             |                 |

**Notes and recommendations from EDI Business Partner reviewing this assessment:**

**Notes and recommendations (if any) from EDI Manager reviewing this assessment:**

**Notes and recommendations (if any) from Head of CETS Service reviewing this assessment:**

