

# EQUALITY IMPACT ASSESSMENT - GREENWICH WEST AND EAST NEIGHBOURHOOD MANAGEMENT SCHEME

24 September 2025

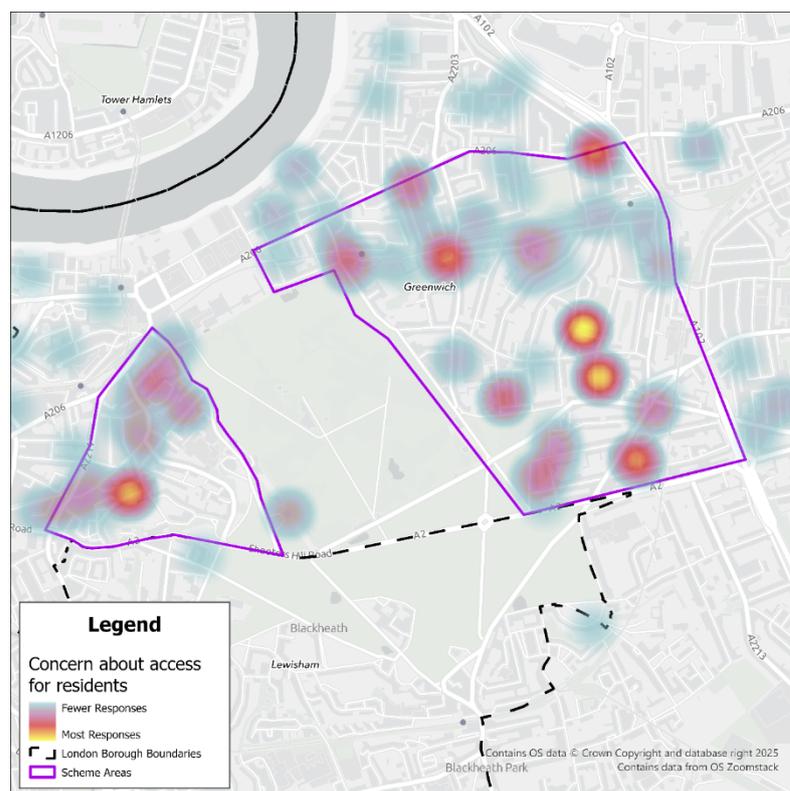
## 1. Overview of the Activity

- 1.1 This report sets out an Equality Impact Assessment (EqIA) that has been carried out to inform the decision on making permanent the West and East Greenwich Neighbourhood management scheme.
- 1.2 The project has been in development over several years, aligning with several council policy priorities. The project is also responding to local residents who have raised concerns over excessive and potentially dangerous motor traffic using B-roads, C-roads and unclassified to avoid the A-roads in the area. Initially this led to the implementation of a trial Low Traffic Neighbourhood (LTN) in the West Greenwich area, restricting motor vehicle movements. The trial scheme was implemented using an Experimental Traffic Order (ETO), which operated between August 2020 and February 2022.
- 1.3 During the trial, local people were invited to give their feedback on the changes via a dedicated Commonplace online platform. A number of responses were received from some residents in East Greenwich, who raised concerns that motor traffic restrictions in West Greenwich may have pushed motor traffic into East Greenwich. Some mitigation measures were trialed in response, however, a decision was made to withdraw the trial scheme in West Greenwich, with trial interventions removed in February 2022.
- 1.4 The feedback received from both neighbourhoods demonstrated the need to consider both areas at the same time, to more fully establish shared benefits and potential mitigations. To this effect, since early 2023 RB Greenwich has led a refreshed design and engagement process, to increase the examination of both areas, and to give local people further opportunities to shape new proposals for both neighbourhoods.
- 1.5 In March 2024, following extensive community engagement and detailed analysis, the Cabinet Member for Climate Action, Sustainability and Transport approved the West & East Greenwich Neighbourhood Management Trial Scheme to address long-standing issues of high through-traffic volumes and air pollution in both neighbourhoods.
- 1.6 The March 2024 decision confirmed the RB Greenwich intention to trial a new neighbourhood traffic management approach using an Experimental Traffic Regulation Order (ETRO). This trial was shaped by a three-stage engagement process designed to ensure local residents and businesses had multiple opportunities to help share the proposals. Those three stages have included:
  - Stage 1 – Listening & Information Gathering: Between February and March 2023, the RB Greenwich held early engagement through two in-person events and two online sessions. Hundreds of residents shared concerns and identified traffic and safety issues, helping to highlight priority areas and strong local support for reducing through-traffic and air-pollution.
  - Stage 2 – Design Feedback: Based on initial insights, the RB Greenwich developed draft design options for West and East Greenwich. Between August and October 2023, these were shared with residents through two planned in-person sessions (one per area), with a third added on 3 October due to high interest. An online session was also held to reach those unable to attend. This stage gathered valuable feedback on traffic restrictions, exemptions, and filter locations.

- 1.7 Stage 3 – Community Feedback on the Trial: Following the March 2024 decision, the Council introduced the trial scheme on 27<sup>th</sup> of November 2024 for up to 18 months. It includes part-time, camera-enforced restrictions on weekdays (7-10am and 3-7pm) to reduce through-traffic, while maintaining access for walking, wheeling, and cycling. All properties remain reachable by car, through alternative routes may be needed during restricted hours. Exemptions apply for Blue Badge holders in RB Greenwich, taxis, private hire vehicles, Council refuse trucks, Royal Mail vehicles and certain special cases .
- 1.8 To gather real-life feedback, the RB Greenwich held seven in-person community sessions in May 2025 across West Greenwich, East Greenwich, Blackheath, and Charlton, along with an online webinar. These events were promoted through direct letters to all households and businesses within the scheme area, providing clear guidance on how to take part. Residents were also able to submit feedback online or by post until the consultation closed on 24th June 2025.
- 1.9 The ETRO was implemented on 27 November 2024, allowing the scheme to be trialled for a maximum of 18 months before a decision is made to either make the changes permanent or remove them by latest 26 May 2026. This includes a mandatory six-month public engagement period as part of the statutory consultation requirements for an Experimental Traffic Order. To assess the performance of the trial scheme, the RB Greenwich extended the public consultation period until 24 June 2025.
- 1.10 In response to the feedback received, including the consultant’s independent analysis of traffic data, air quality, queue lengths, bus journey times, feedback from residents and stakeholders input RB Greenwich has investigated the following Options:
- **Option 1:** Make the trial scheme permanent with no changes.
  - **Option 2:** Make the trial scheme permanent with changes to the location of certain ANPR filters but no timings or revision to exemptions.
  - **Option 3:** Make the trial scheme permanent with changes to the location of ANPR filters, revised exemptions, but no changes to hours of operation.
  - **Option 4:** Make the trial scheme permanent with changes to the location of ANPR filters, revised exemptions (including resident exemptions), and extended hours of operation to 24 hours daily.
  - **Option 5:** Make the trial scheme permanent with no changes to the location of ANPR filters, revised exemptions (including resident exemptions), and extended hours of operation to 24 hours daily.
  - **Option 6:** Make the trial scheme permanent with no changes to the location of ANPR filters, revised exemptions (including resident exemptions) but no changes to hours of operation.
  - **Option 7:** Make the trial scheme permanent with no changes to the location of ANPR filters, no changes to exemptions and extend hours to 24 hours daily.
  - **Option 8:** Make only the East Greenwich scheme permanent and remove the West Greenwich scheme.
  - **Option 9:** Make only the West Greenwich scheme permanent and remove the East Greenwich scheme.
  - **Option 10:** End the ETRO and remove the scheme, returning the roads to their original layout.
- 1.11 Based on monitoring data, statutory consulting and alignment with the RB Greenwich strategic objectives, Option 3, is recommended as the preferred approach:
- Make the scheme permanent with changes to ANPR filter locations by removing filters on Royal Hill but protecting side roads, revised exemptions (Blue Badge holders able to register up to two vehicles instead of one), but no changes to hours of operation.

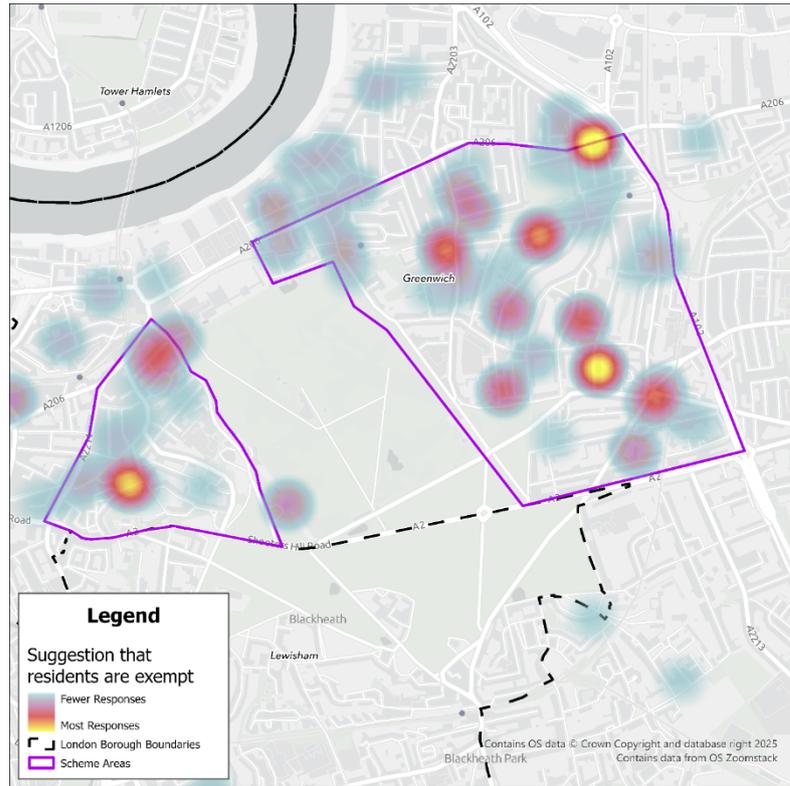
- 1.12 A total of 365 respondents raised concerns about access for residents within the trial scheme area, of which 203 (56 per cent) provided a valid postcode, as mapped in Figure 1. These concerns were more frequently reported in the East scheme area, with notable hotspots around Mycenae Road / Beaconsfield Road and Strathenden Road / Langton Way, while in the West scheme area, the highest number of concerns came from residents in the Maidenstone Hill / Winforton Street area.

**Figure 1: Concerns about access for residents**



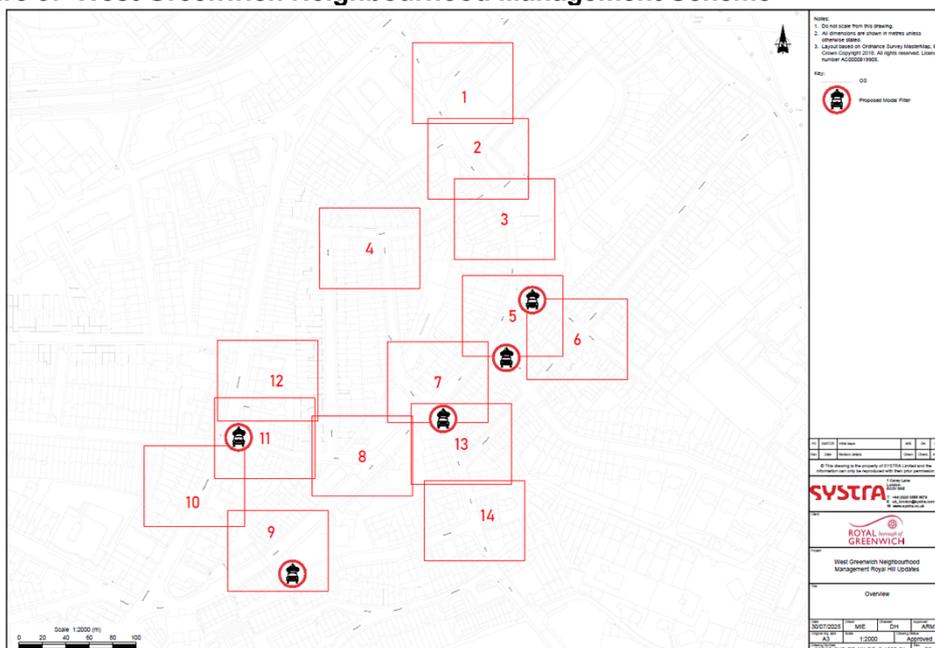
- 1.13 A total of 372 respondents suggested that residents should be exempt from the scheme's filters and restrictions. Of these, 198 (53 per cent) provided a valid postcode, and their locations are shown in Figure 2. The majority of these suggestions came from key hotspots within the East scheme area, particularly around Woolwich Road, Mycenae Road, and Humber Road. In contrast, fewer respondents in the West scheme area raised this point, with most of the feedback concentrated around the Maidenstone Hill / Winforton Street area.

**Figure 2: Suggestion that residents are exempt**

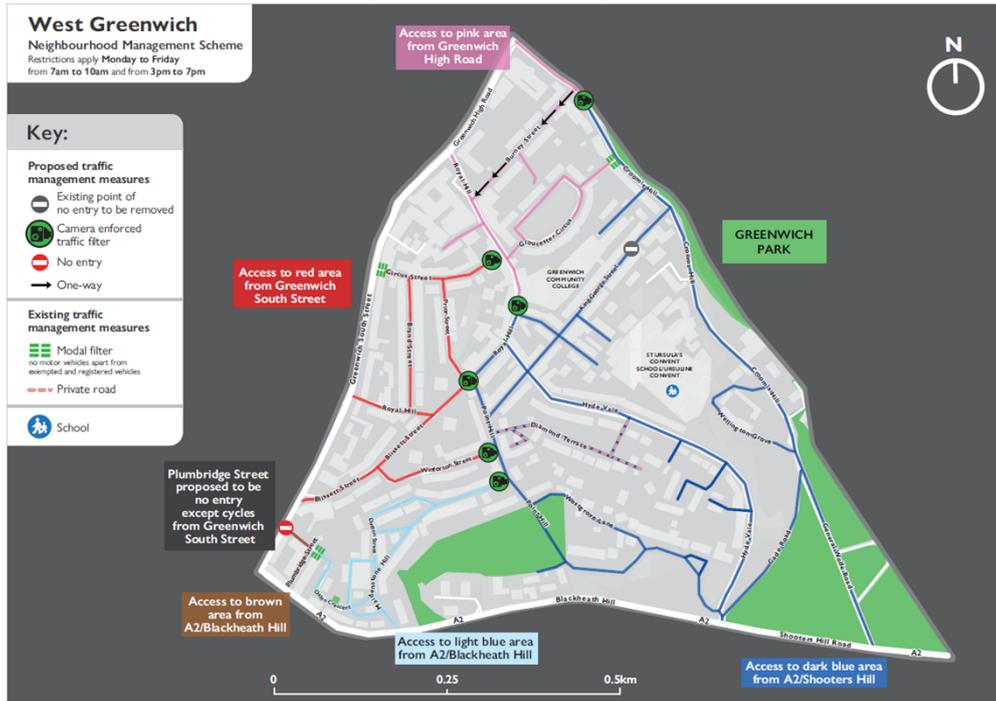


- 1.14 Furthermore, RB Greenwich recommend to investigate mitigation measures and complementary measures for the area.
- 1.15 Figures 3,4 and 5 shows the West and East Greenwich Neighbourhood Management Scheme areas. Following feedback on the West Greenwich area, it is proposed to relocate the existing modal filters (signs and cameras) from Royal Hill, onto the side roads (Royal Place; Hyde Vale; Point Hill; and Winforton Street). In addition, a new filter is proposed at junction of Royal Hill and Greenwich Street. No changes are proposed for the East Greenwich area.

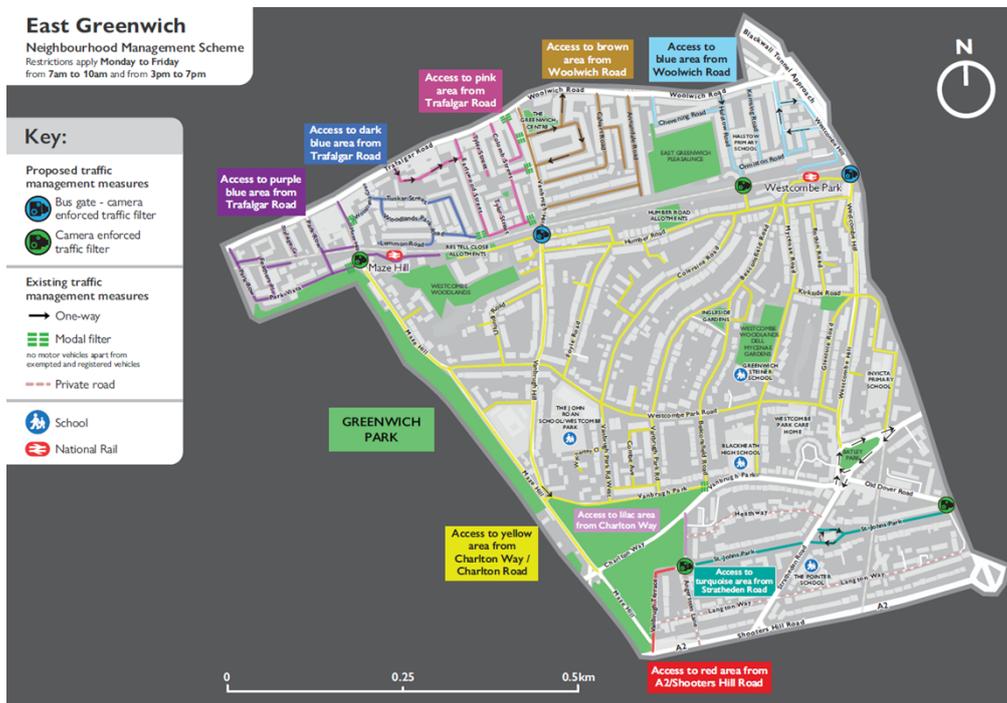
**Figure 3: West Greenwich Neighbourhood Management Scheme**



**Figure 4: West Greenwich Neighbourhood Management Scheme**



**Figure 5: East Greenwich Neighbourhood Management Scheme**



1.16 This EqIA has been produced to ensure that the project does not unlawfully discriminate against any protected characteristic, helping RB Greenwich to fulfil its legal obligation under the Equality Act 2010, to have due regard<sup>1</sup> to the need to:

- eliminate unlawful behaviour, such as discrimination, harassment and victimisation;
- promote equality of opportunity between those who share a protected characteristic and those who don't; and

- promote good relations between people who share a protected characteristic and those who don't.

1.17 The way that RB Greenwich demonstrates due regard for these three aims, and therefore that they are complying with the public sector equality duty, is by undertaking an EqIA.

1.18 The duty applies with respect to the following nine Equality Act protected characteristic groups:

- Age.
- Disability, including family carers<sup>2</sup>.
- Gender reassignment<sup>3</sup>.
- Marriage and civil partnership.
- Pregnancy and maternity.
- Race.
- Religion or belief.
- Sex.
- Sexual orientation.

1.19 This EqIA should be used in the decision-making process and should be read in conjunction with the Decision Report and Monitoring and Engagement Results Report produced by Steer Group. The EqIA seeks to establish the impacts, both positive and negative, that the scheme would have on the nine protected groups defined in the Equality Act, 2010 and, where necessary and appropriate, mitigate any negative impacts.

1.20 This EqIA is informed by equalities data for the RB Greenwich, and Greater London, and equality-related data gathered during public consultation exercise for the scheme.

## 2. Data and Evidence Gathering

2.1 This section sets out the existing equality data available at the time of writing. Analysis of this data can help understand the potential impact and mitigation of the amendments and for making the scheme permanent on people (in respect of their protected characteristics) who may be affected by the proposals. As the schemes cover a large area, encompass several wards, and are likely to impact people from outside in addition to those located within both neighbourhoods, specific ward data has not been gathered.

**Table 1 presents demographic information gathered in the 2021 Census on certain protected characteristic groups in both the Royal Borough of Greenwich and Greater London.**

**Table 1: Census 2021 Demographic Data**

		<b>Royal Borough of Greenwich</b>	<b>Greater London</b>
<b>Population</b>	<b>All Resident</b>	<b>289,068</b>	<b>8,799,728</b>
<b>Age</b>	Aged 4 years and under	6.6%	6.0%
	Aged 5 to 9 years	6.5%	6.0%
	Aged 10 to 15 years	7.4%	7.2%
	Aged 16 to 19 years	4.4%	4.4%
	Aged 20 to 24 years	6.4%	6.7%
	Aged 25 to 34 years	18.2%	18.1%
	Aged 35 to 49 years	23.6%	22.7%
	Aged 50 to 64 years	16.5%	16.9%
	Aged 65 to 74 years	6.0%	6.5%
	Aged 75 to 84 years	3.3%	3.8%
	Aged 85 years and over	1.2%	1.6%
<b>Disability</b>	Day-to-day activities limited a lot	6.4%	5.7%
	Day-to-day activities limited a little	8.0%	7.5%
	Has long term physical or mental health condition but day-to-day activities are not limited	5.3%	5.2%
	No long term physical or mental health conditions	80.3%	81.5%
<b>Gender reassignment*</b>	Gender identity the same as sex registered at birth	92.0%	91.2%
	Gender identity different from sex registered at birth but no specific identity given	0.4%	0.5%
	Trans woman	0.2%	0.2%
	Trans man	0.2%	0.2%
	Non-binary	0.1%	0.1%
	All other gender identities	0.0%	0.0%
	Not answered	7.2%	7.9%
<b>Marriage and civil partnership</b>	Never married and never registered a civil partnership	47.1%	46.2%
	Married or in a registered civil partnership	38.0%	40.0%
	Separated, but still legally married or still legally in a civil partnership	2.9%	2.3%
	Divorced or civil partnership dissolved	8.2%	7.3%
	Widowed or surviving civil partnership partner	3.9%	4.2%
<b>Pregnancy and maternity</b>	No data	No data	No data
<b>Race</b>	Asian, Asian British or Asian Welsh	13.2%	20.7%
	Black, Black British, Black Welsh, Caribbean or African	21.0%	13.5%
	Mixed or Multiple ethnic groups	6.0%	5.7%
	White	55.7%	53.8%
	Other ethnic group	4.2%	6.3%
<b>Religion of belief</b>	No religion	32.6%	27.1%
	Christian	44.7%	40.7%

	Buddhist	1.7%	0.9%
	Hindu	4.0%	5.1%
	Jewish	0.2%	1.7%
	Muslim	8.5%	15.0%
	Sikh	1.1%	1.6%
	Other religion	0.6%	1.0%
	Not answered	6.5%	7.0%
<b>Sex</b>	Males	48.6%	48.5%
	Females	51.4%	51.5%
<b>Sexual orientation*</b>	Straight or Heterosexual	87.0%	86.2%
	Gay or Lesbian	2.5%	2.2%
	Bisexual	1.5%	1.5%
	Pansexual	0.1%	0.1%
	Asexual	0.1%	0.0%
	Queer	0.1%	0.1%
	All other sexual orientations	0.3%	0.3%
	Not answered	8.6%	9.5%

## Age

2.2 Royal Greenwich has a resident population of approximately 289,068 (Census, 2021). The age profile is as follows:

- 20.5% of the population are children and young people aged under 16.
- 69.1% of the population are of 'working age' between 16 and 64.
- 10.5% of the population are aged over 65.

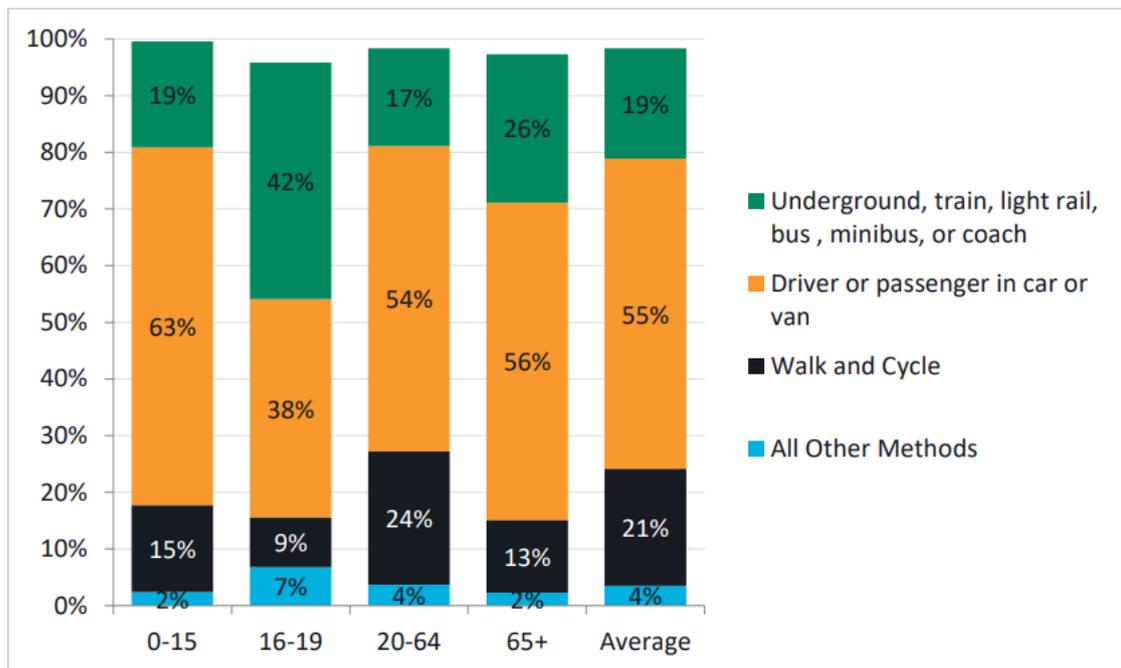
2.3 The age profile for Greater London is relatively similar and is as follows:

- 19.2% of the population are children and young people aged under 16.
- 68.8% of the population are of 'working age' between 16 and 64.
- 11.9% of the population are aged over 65.

2.4 According to the London Travel Demand Survey (LTDS, Report 12), London's population is getting older. Between the last two censuses, the average (median) age of Greenwich increased by two years, from 33 to 35 years of age. The number of people aged 50 to 64 years rose by around 12,400 (an increase of 35.0%), while the number of residents aged 4 years and under fell by just over 1,900 (9.2% decrease).

Figure 66 (*West Greenwich Low Traffic Neighbourhood: Equality Impact Assessment, Steer on behalf of the Royal Borough of Greenwich, February 2022*) presents LTDS data on how people travel around Greenwich within each age category. The highest percentages of walking and cycling can be seen in those aged 20-64, with 24% of all trips made on foot or by bike. Those aged 16 to 19 and over 65 have the lowest levels of walking and cycling, with 9% and 13% of all trips (respectively). As a proportion of mode share, car usage is highest in under 15s, which can be attributed to children being driven around by their parents/carers. At 63%, those aged under 15 have a higher mode share of driver or passenger in a car or van than any other age range. Public transport use is disproportionately higher in the 16 to 19-year-old group, making up 42% of all journeys. This is 16% higher than the nearest age group (those aged over 65).

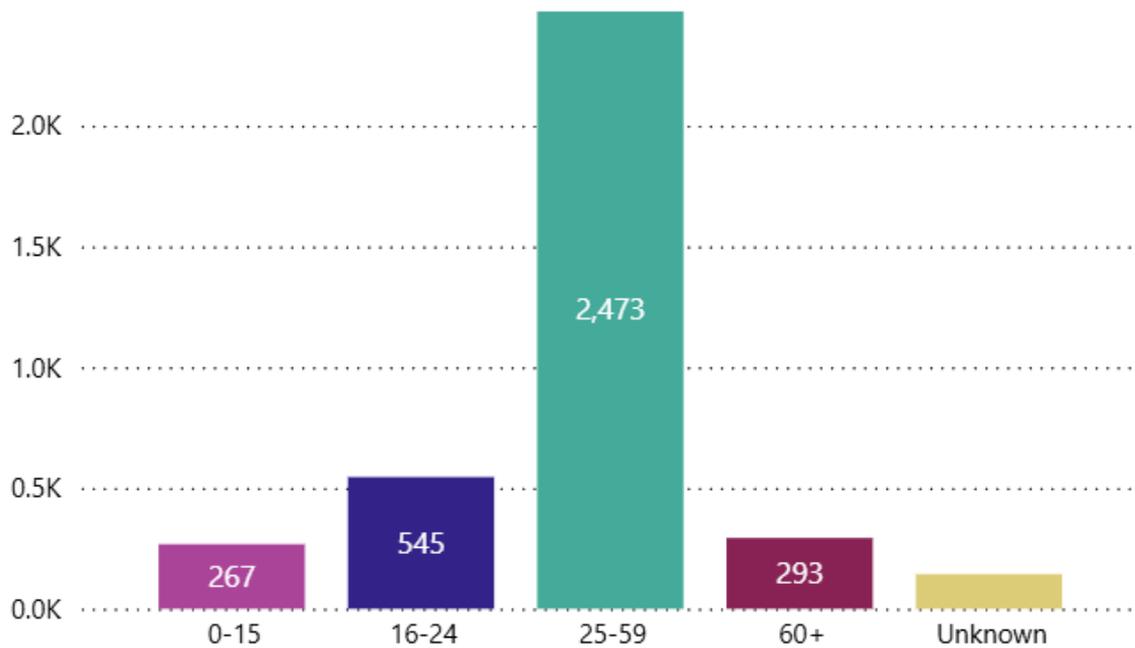
**Figure 6: Mode Share by Age in Greenwich (Steer, 2022)**



Source: LTDS (2016/17, 2017/18 and 2018/19)

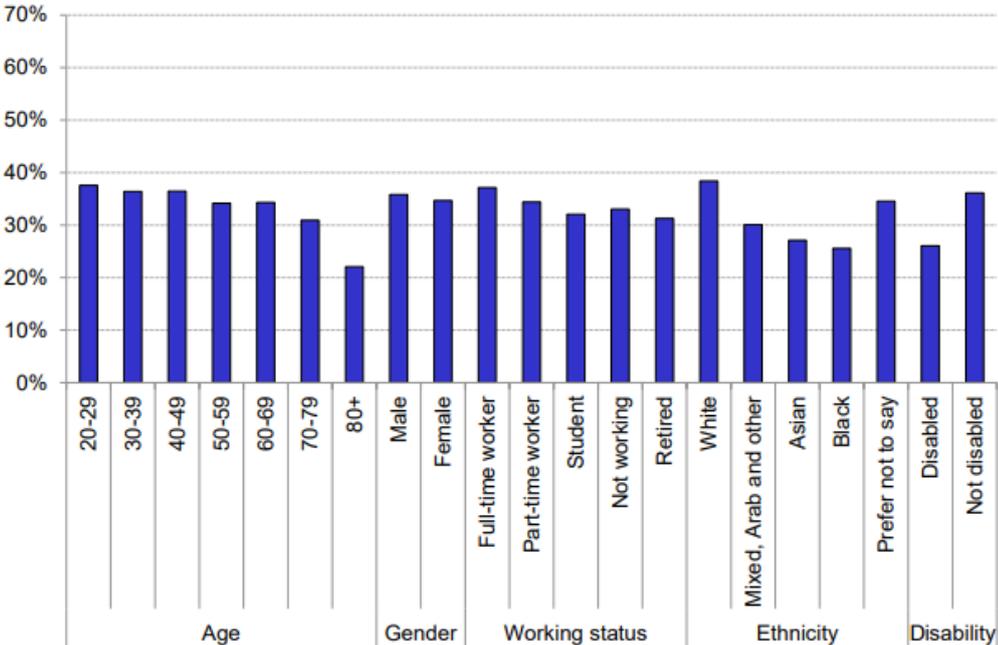
2.6 Figure 7<sup>4</sup> shows casualties by age band within Greenwich Borough from January 2020 until December 2024. Of the 3,721 individuals, 267 are aged 0-15, 545 are aged 16-24, and 2,473 fall within the 25-59 age group. A further 293 individual are aged 60 and above, while 143 have an unrecorded or unknown age. The data shows that the largest group affected is those aged 25-59, with notably smaller numbers in the younger and older age brackets.

**Figure 7: Casualties by age band in Royal Borough of Greenwich**



- 2.7 The health of children and elderly people is impacted disproportionately by the effects of poor air quality levels. When considered with the fear of road danger and other factors, this can result in isolation and exclusion. Inactivity is also a concern: these age groups are the least active; more active lifestyles will improve health among these groups, reducing health inequalities.
- 2.8 Analysis of walking and cycling potential undertaken by Transport for London (TfL) suggests that a significant proportion of trips currently being driven in Greenwich could be switched to healthier and more sustainable modes, based on a range of factors including age, journey distance, journey purpose and whether loads are being carried. Along with other evidence for London, it is reasonable to conclude that many of Greenwich's current motorised trips could be avoided or shifted: i.e. made by other more sustainable modes.
- 2.9 The proposed scheme is expected to deliver both positive and negative impacts on air quality, with these effects varying across age groups. Children and young people, who are particularly vulnerable to the health effects to air pollution, would benefit from the anticipated reductions in traffic-related emission within the scheme area, improving respiratory health and reducing exposure during travel to school. Older adults, another group more susceptible to poor air quality, are likewise expected to see health benefits from cleaner air. Overall, air quality is expected to improve across most of the project area as well as along the majority of boundary roads, The only locations where notable negative impacts are anticipated are Greenwich South Street and Blackheath Hill, where some displacement of traffic may increase exposure for residents, including children and elderly people. More details can be found on the Appendix B – Air Quality Report, part of the West and East Neighbourhood Management trial Scheme – Final Decision Report.
- 2.10 Figure 8 (LTDS, 2020/21) shows that the proportion of people who achieve at least 20 minutes of active travel per day decreases with age.

**Figure 8: Proportion of London residents aged 20+ who achieve at least 20 minutes of active travel per day, by socio-demographic group, LTDS, 2020/21**

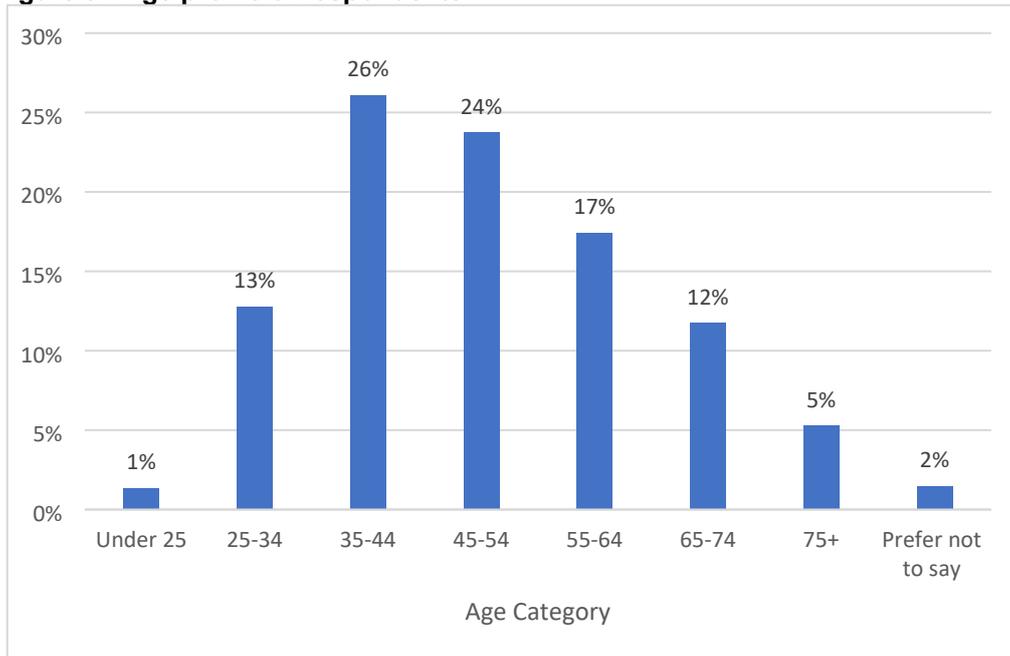


Source: TfL City Planning.

Commonplace Results

2.11 Respondents were asked a series of demographic questions to help the RB Greenwich gain a better understanding of the characteristics and needs of those affected by the scheme. The age profile of the 1,532 respondents who provided their age is presented in Figure 9. The most commonly reported age group was 35-44 years (26%), followed by 45-54 years (24%). This is followed by the 55-64 group (17%) and the 25-34 group (13%). Older age groups, including 65-74 (12%) and 75+ (5%), are also represented, though to a less extent. Younger respondents under 25 make up only 1%, and 2% participants preferred not to disclose their age.

**Figure 9: Age profile of respondents**



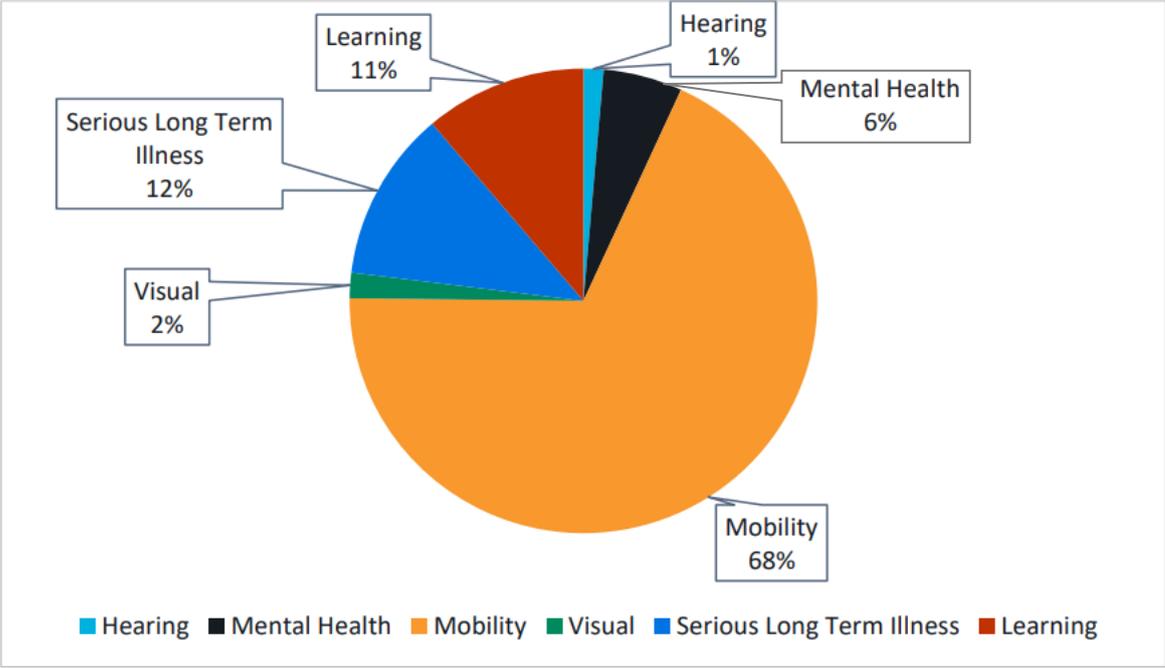
## Disability

2.12 The following disability data for RB Greenwich and Greater London was available in the 2021 Census:

- In Greenwich, 14.4% of the population have a disability which limits their day-to-day activities. In contrast, 85.6% of the population does not have a disability, in line with the Equality Act definition.
- In Greater London the disability figure is lower, with 13.2% of the population having a disability which limits their day-to-day activities. 86.7% of the Greater London population does not have a disability, in line with the Equality Act definition. The data suggest that there is a slightly higher proportion of disabled people in Greenwich in comparison to Greater London.

2.13 Figure 10 (Steer, 2022) shows the impairment types stated by those who live in Greenwich and have an impairment affecting daily travel. Mobility impairment represents the highest proportion (68%) followed by impairment due to serious long-term illness (12%). It should be noted that this data is based on a small sample, therefore results should be taken as a general indication only.

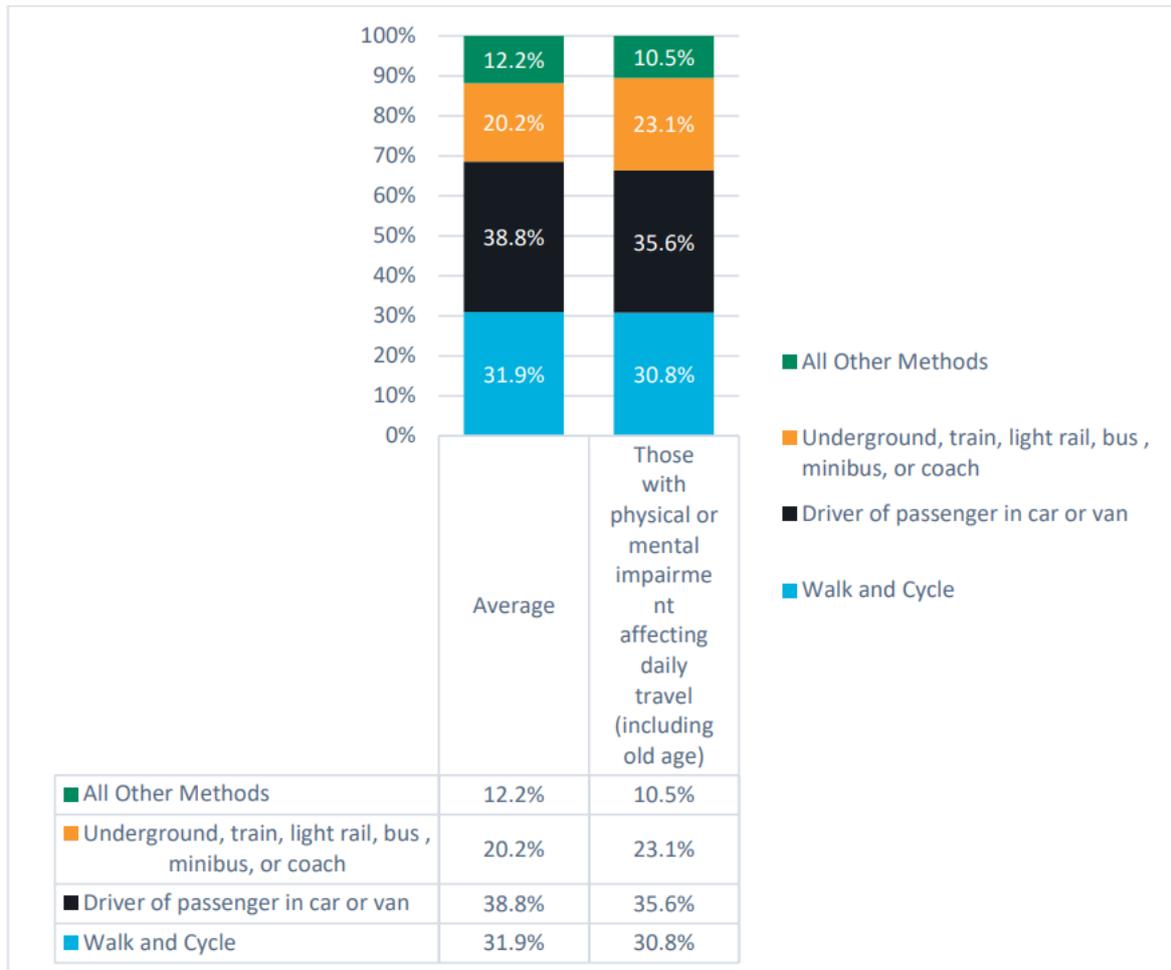
**Figure 10: Impairment types stated by those with an impairment affecting travel in Greenwich**



Source: LTDS (2016/17, 2017/18 and 2018/19)

2.14 Figure 11 (Steer, 2022) shows the mode split for people with a physical or mental impairment. When compared to the LTDS mode split of trips made by all people, car use for disabled people is lower (35.6% compared to 38.8%), public transport use for disabled people is greater (23.1% compared to 20.2%) and walking and cycling by disabled people is within one percentage point (30.8% compared to 31.9%).

**Figure 11: Mode split by those with a physical or mental impairment affecting daily travel**



Source: LTDS (2016/17, 2017/18 and 2018/19)

- 2.15 Figure 8 (Report 14, LTDS) shows that there is a considerable difference in the proportion of people who achieve at least 20 minutes of active travel per day, between disabled residents (26%) and residents who are not disabled (36%).
- 2.16 Evidence shows that disabled people make most of their local journeys by walking, wheeling (and by bus). These are generally local trips - distances of under one kilometre where the street environment directly influences day-to-day activities. The [Pave the Way](#) report, by Transport for All, shows that in general, disabled people hold positive and negative opinions on “low traffic neighbourhoods” – there is diversity in thought, experience and opinion among disabled people. Some people report easier or more pleasant journeys, an increase in independence, a decrease in road danger, and benefits to physical and mental health. Also, some people report longer journey times for residents, visitors and carers, which may contribute to some trips becoming more exhausting, expensive or difficult, with corresponding cases of negative impacts on mental health, potential issues with taxi journeys, and a perceived rise in road danger.

Commonplace Results

- 2.17 No data on ‘Disability’ status was gathered from Commonplace during the public consultation for West and East Greenwich Neighbourhood management Trial Scheme and therefore no initial data-led observations or conclusions can be drawn for this EqIA.

## Gender Reassignment

2.18 According to the 2021 Census Data on Gender Reassignment:

- In the Royal Borough of Greenwich, 0.9% of the population disclosed having a gender identity different from the one assigned at birth. This figure is equivalent to the Greater London percentage, which is reported at 1%.
- In RB Greenwich, 92% of the population confirmed having a gender identity aligning with the sex registered at birth. This is within one percentage point of the corresponding figure for Greater London, which stands at 91.2%.

2.19 A study by the Gender Reassignment Education and Research Study funded by the Home Office found that there is an estimated number of 300,000 to 500,000 transgender people within the UK. A national survey (Gov, 2011) confirmed that respondents within that category feared for their safety on the streets and using public transport (1,275 respondents). More specifically:

- Nearly half of respondents (47%) said they were worried about being a victim of a violent crime or harassment.
- Around three-quarters of respondents (76%) had never brought a complaint to the police, and nearly half of respondents (47%) cited police lack of understanding/sensitivity as being the greatest challenge in bringing about a complaint.

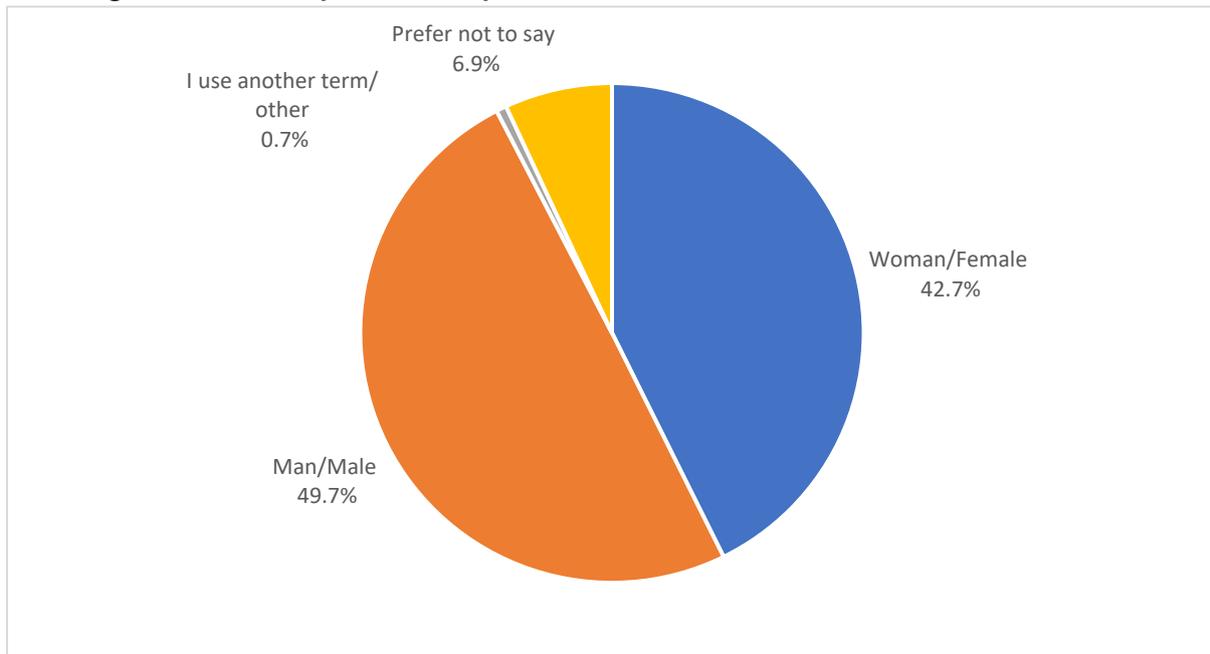
2.20 UK crime data for 2019/20 shows 'Transgender identity' accounts for one per cent of hate crimes recorded by the British Transport Police and 1.25 per cent of hate crimes recorded by the Metropolitan Police.

2.21 According to the 2021 Walking and Cycling Index (previously known as Bike Life) (Sustrans, 2021), just 51% of individuals identifying their gender 'in another way' reported feeling welcome and comfortable walking or spending time on streets in their neighbourhood. In contrast, 65% of women and 67% of men expressed such comfort levels. Similarly, the index revealed that 59% of LGBTQ+ individuals feel welcome and comfortable in their neighbourhood streets, compared to a higher rate of 67% among heterosexual individuals.

### Commonplace Results

2.22 As presented in Figure 12, of the 1,518 respondents who provide a gender response, the profile indicates a relatively balanced representation, with 49.7% identifying as Man/Male and 42.7% as Woman/Female. A small proportion of respondents (6.9%) preferred not to provide this information, while 0.7% identified using another term. This distribution suggests that engagement efforts have successfully reached a broad cross-section of gender identities. However, the very low percentage of respondents using alternative gender terms may indicate a need for more inclusive outreach strategies to better engage non-binary and gender-diverse individuals.

**Figure 12: Gender profile of respondents**



### **Marriage and Civil Partnership**

2.23 According to the 2021 Census Data on Marriage and Civil Partnership:

- 47.1% of residents in RB Greenwich have never married and never registered a civil partnership compared to 46.2% of residents in Greater London.
- 38.0% of residents in RB Greenwich are married or in a registered civil partnership, compared to 40.0% of residents in Greater London.

2.24 The impact assessment does not include individuals of specific marital status in both East and West Greenwich, as it is believed that they are unlikely to be disproportionately affected by the consulted measures.

#### Commonplace Results

2.25 No data on 'Marriage and Civil Partnership' status was gathered from Commonplace during the public consultation for West and East Greenwich Neighbourhood management Trial Scheme and therefore no initial data-led observations or conclusions can be drawn for this EqIA.

### **Pregnancy and Maternity**

2.26 Many of the issues which impact women, disabled people and the older generation such as overcrowded public transport, lack of places to stop and rest, and poor air quality levels are relevant here. The Baby on Board badge was launched by TfL in 2006 to help women who felt awkward or perhaps intimidated to ask for a seat on public transport.

#### Commonplace Results

2.27 No data on 'Pregnancy and Maternity' status was gathered from Commonplace during the public consultation for West and East Greenwich Neighbourhood management Trial Scheme and therefore no initial data-led observations or conclusions can be drawn for this EqIA.

## Race

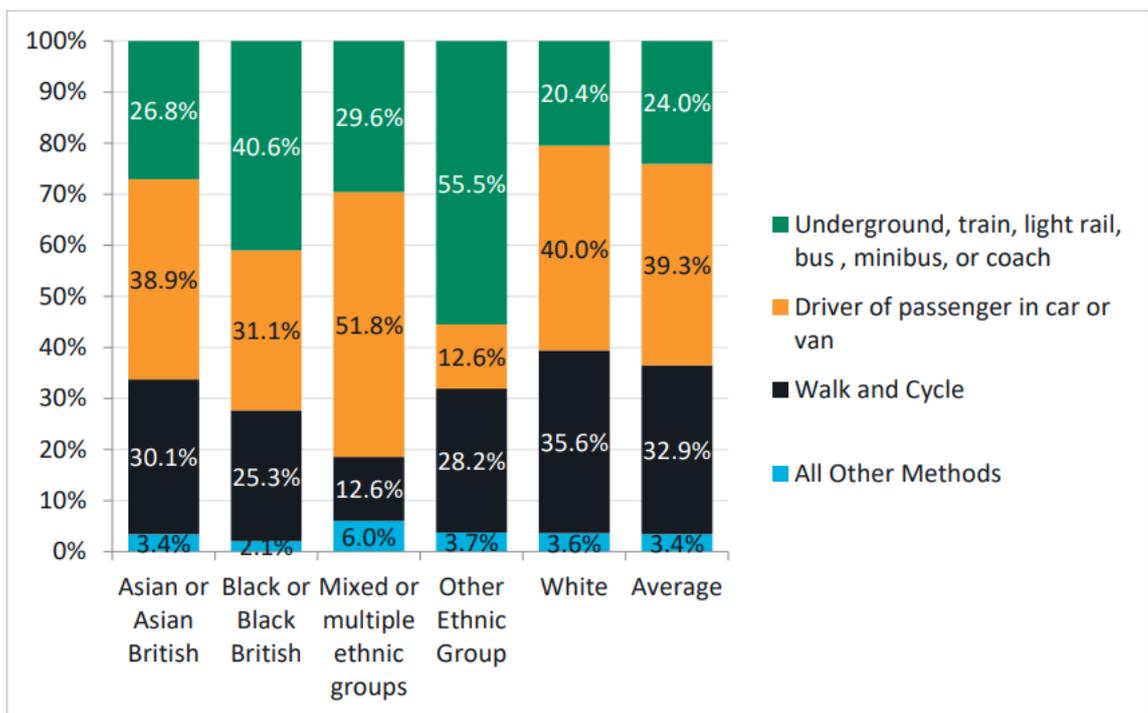
2.28 The following key findings within the ethnicity data for RB Greenwich and Greater London were available in the 2021 Census:

- 13.2% of the population in Greenwich are Asian, Asian British or Asian Welsh, which is much lower than the Greater London figure (20.7%).
- 21.0% of the population are Black, Black British, Black Welsh, Caribbean or African, which is much higher than the Greater London figure (13.5%).
- 6.0% of the population are Mixed or Multiple ethnic groups, which is similar to the Greater London figure (5.7%).
- 55.7% of the population are White, which is slightly higher than the Greater London figure (53.8%).

2.29 Figure 13 (Steer, 2022) shows average travel modes from the LTDS data. In Greenwich 'Asian/Asian British', 'Mixed or multiple ethnic groups' and 'White' residents are more likely to drive or be driven in a car or van than use any other mode. 'White' residents are most likely to walk and cycle than the average. 'Other Ethnic Group' are more likely to use public transport than the average.

2.30 It is important to note that the sample size of LTDS data is small, therefore these percentages may not accurately reflect the travel behaviours of each ethnic group.

**Figure 13: Mode share by ethnicity in Greenwich**



Source: LTDS (2018/19)

2.31 Figure 8 (Report 14, LTDS) shows that White residents (38%) are much more likely to achieve at least 20 minutes of active travel per day than any other group, with achievement among Black residents the lowest, at 26%.

- 2.32 From TfL's Understanding Diverse Communities Report (2019), 19% of white Londoners have Freedom Passes compared with 10% of Black, Asian & Minority Ethnic Londoners. These differences are largely linked to the differing age profile of Black, Asian & Minority Ethnic and white Londoners. The proportion of Black, Asian & Minority Ethnic and white Londoners aged 65 and over who hold a Freedom Pass is similar: 91% and 93% respectively. Mixed ethnic group Londoners remain significantly less likely than all other ethnic groups to hold an older person's Freedom Pass, reflecting the younger age profile of this group.
- 2.33 In 2021 for the first time, Black, Asian and minority ethnic Londoners were as likely to have cycled in the last 12 months as white Londoners<sup>5</sup> Safety is a major perceived issue for people who do not cycle, with some believing it is not safe because of distracted driving, speeding motor traffic, and busy motor traffic. Significant barriers to encouraging more people to cycle remain. Across all backgrounds, there are major concerns around safety on the road, with 82% of non-cyclists worried about road safety and collisions.

#### Commonplace Results

- 2.34 No data on 'Race' status was gathered from Commonplace during the public consultation for West and East Greenwich Neighbourhood management Trial Scheme and therefore no initial data-led observations or conclusions can be drawn for this EqIA.

#### **Religion**

- 2.35 The following key points are noted in data on religion for RB Greenwich and Greater London from the 2021 Census:
- A higher percentage of the population in Greenwich have no religion (32.6%) than in Greater London (27.1%)
  - A higher percentage of the population in Greenwich are Christian (44.7%) than in Greater London (40.7%)
  - A higher percentage of the population in Greenwich are Buddhist (1.7%) than in Greater London (0.9%)
  - A lower percentage of the population in Greenwich are Hindu (4.0%) than in Greater London (5.1%)
  - A lower percentage of the population in Greenwich are Jewish (0.2%) than in Greater London (1.7%)
  - A lower percentage of the population in Greenwich are Muslim (8.5%) than in Greater London (15%)
  - A lower percentage of the population in Greenwich are Sikh (1.1%) than in Greater London (1.6%)
- 2.36 Religious observance may affect when and where people travel. For example, some Jewish people do not drive on Saturdays, and places of worship and faith-based schools are major destinations for large populations from different groups, particularly on certain dates and at certain times of the day.

#### Commonplace Results

- 2.37 No data on 'Religion' status was gathered from Commonplace during the public consultation for West and East Greenwich Neighbourhood management Trial Scheme and therefore no initial data-led observations or conclusions can be drawn for this EqIA.

## Sex

2.38 Based on Census 2021 data for RB Greenwich and Greater London:

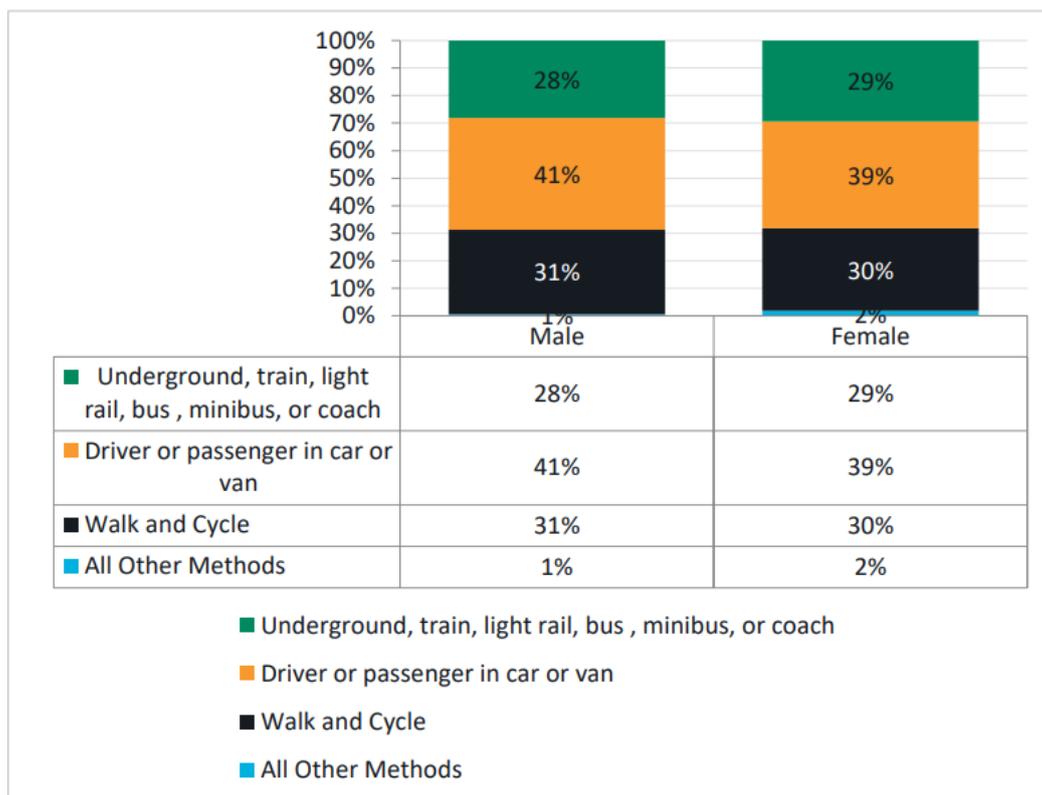
- Females make up a higher proportion of the population in RB Greenwich than males at 51.4% and 48.6% respectively.
- The ratio of females to males is similar in Greater London, at 51.5% and 48.5% respectively.

2.39 Figure 8 (Report 14, LTDS) shows that there is very little difference in achievement of at least 20 minutes of active travel per day, between male and female residents (36% vs 35% respectively).

2.40 **Error! Reference source not found.**4 (Steer, 2022) presents the mode share by sex in RB Greenwich. 'Driver or passengers in a car or van' is the most commonly used type of transport by both male and female residents, representing 41% of all trips for males, and 39% of all trips for females. On average, females use public transport slightly more than males, at 29% compared to 28% respectively.

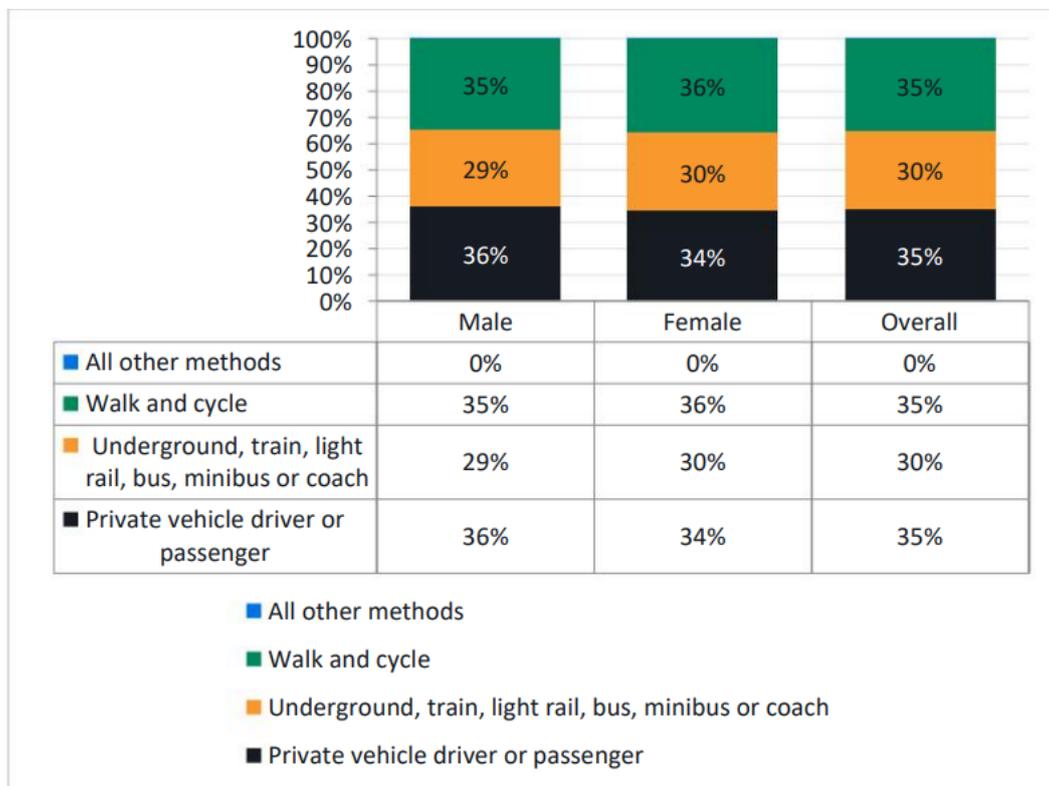
2.41 Compared to the London average, presented in Figure 15 (Steer, 2022), fewer people in RB Greenwich walk and cycle (31% male and 30% female vs 35% and 36%, respectively), and more people drive (41% male and 39% female vs 36% and 34%, respectively).

**Figure 14: Mode share by sex in Royal Greenwich**



Source: LTDS (2016/17, 2017/18, 2019/19)

**Figure 15: Mode share by sex in London**



Source: LTDS average (2017/18, 2018/19, 2019/20)

2.42 Following high profile crimes committed in London, a national movement highlighted the concerns of women and how safe they feel at particular times of the day, notably at night. There is some concern that this perceived risk impacts women’s willingness to make trips by active travel modes after dark. Safety and security on public transport and at stations is also a concern for women who often feel vulnerable to attack.

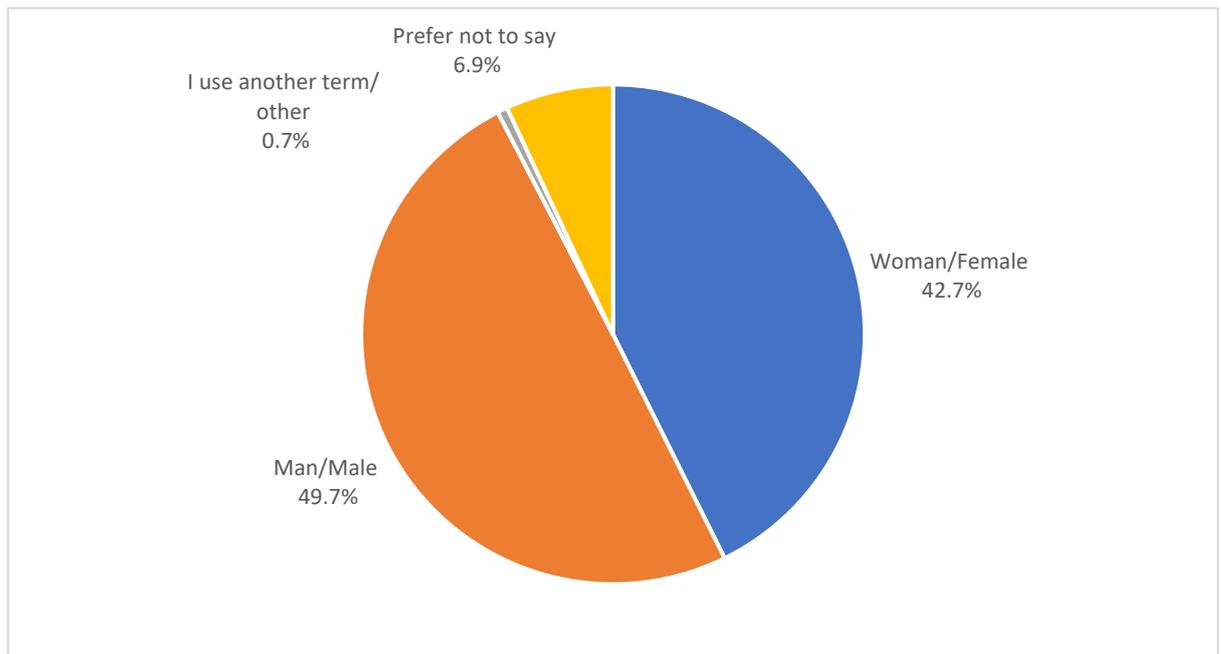
2.43 According to the report “Understanding Our Diverse Communities” (TfL 2019):

- Women tend to complete more weekday trips on average than men (2.5 compared to 2.3). Walking is the most used type of transport by women (95% walk at least once a week). Women are more likely to use buses than men (62% compared with 56%) but are less likely to use other types of transport including the Tube (38% women compared with 43% men).
- Women are more likely than men to be travelling with buggies and/or shopping, and this can affect transport choices.
- Satisfaction with transport among women and men is very similar and is mainly driven by the ease of making the journey.
- Women are more likely than men to experience worrying incidents when travelling on public transport and are more likely to be deterred from using public transport more often by a number of different barriers.

Commonplace Results

2.44 Figure 16 illustrates the “Sex” breakdown of 1,518 respondents who provided this information. Of these respondents, 49.7% identifying as Man/Male and 42.7% as Woman/Female. A small proportion of respondents (6.9%) preferred not to provide this information, while 0.7% identified using another term.

**Figure 16: Sex profile of respondents**



### **Sexual Orientation**

2.45 According to the 2021 Census data on sexual orientation:

- In the RB Greenwich, the percentage of individuals identifying as Straight or Heterosexual stands at 87.0%, mirroring a comparable proportion to the Greater London population, which is reported at 86.2%.
- A marginally higher proportion of individuals identify as LGBTQ+ (encompassing all other sexual orientations) in the RB Greenwich, accounting for 4.6%, as opposed to the 4.2% reported in Greater London as a whole.

2.46 As per the 'Travel in London: Understanding our diverse communities' study (TfL, 2019), individuals in London identifying as LGB (lesbian, gay, and bisexual) make up a lower figure, at 2.6% of the city's population. The study reveals that when questioned about obstacles in utilising public transport, LGB individuals share a comparable profile with the general population. More than half (52%) of LGB respondents identified overcrowding as a concern, slightly higher than the 48% reported by the general population. The cost of travel was pinpointed as an issue by 41% of both LGB respondents and the general population. Notably, 30% of LGB respondents highlighted passenger pushing and shoving on public transport, compared to 26% in the general population. The study concludes that concerns about abuse and/or intimidation significantly influence the travel behaviours of LGB Londoners.

2.47 Under-reporting on the size of lesbian, gay and bisexual communities is a recognised issue, so it is difficult to accurately understand the size of this proportion of the population, particularly at the borough level. An upper estimate for London suggests that roughly 25% of the population is lesbian, gay or bisexual although these figures may underrepresent the size of this population due to societal issues surrounding the disclosure of sexual orientation. Similar to women and people who are going or have gone through gender reassignment, members of the LGBTQ+ community often find safety and security issues as a concern on public transport.

### Commonplace Results

2.48 No data on 'Sexual Orientation' status was gathered from Commonplace during the public consultation for West and East Greenwich Neighbourhood management Trial Scheme and therefore no initial data-led observations or conclusions can be drawn for this EqIA.

### **3. How will people with protected characteristics be impacted by the change?**

- 3.1 This Equality Impact Assessment has identified several positive and negative impacts which may be experienced amongst the protected equalities groups of age, disability, pregnancy and maternity, ethnicity or race, religion or belief, sex/gender and sexual orientation, as discussed below. It is not anticipated that the scheme would result in any unlawful discrimination against groups with protected characteristics and the positive impacts are considered to outweigh the negative impacts.

#### **Table 2: Summary of Potential Positive Impacts on the Protected Groups**

Protected Characteristic	Is there a potential positive impact? (Yes or No)	Explain the potential positive impact
Age	Yes	Most locations have experienced improved air quality and reduced volumes over time, including some boundary roads. Both younger and older residents are expected to benefit from the positive impacts of improved air quality. For older residents, these changes may also support greater confidence in using public spaces and public transport. Enhanced safety and lower traffic levels promote social inclusion and help reduce isolation.
Disability	Yes	Disabled people in RB Greenwich who are Blue Badge holders (Blue Badge holders able to register up to two vehicles instead of one) benefit from formal exemptions under both the trial and permanent schemes. Taxis and Private Hire Vehicles are also exempt from modal filters, which are particularly beneficial for Disabled people who may rely on them for accessible travel. Safer crossings, quieter roads, and less driver aggression benefit wheelchair users, people with hearing or visual impairments, and those using mobility scooters or other mobility aids. Reduced noise also benefits neurodivergent residents. Complementary measures to improve public realm changes (e.g. fewer obstructions, better kerbs) can increase independent access. Enhanced air quality is likely to benefit those with asthma or other respiratory related conditions.
Gender reassignment	Yes	A safer, more predictable public realm supports confidence in using public space. Reduced traffic and quieter streets may reduce the likelihood of harassment. Complementary measures like improved lighting – if implemented- could address concerns about safety at quieter times.
Marriage and civil partnership	Yes	The scheme does not directly target this group, but everyone – including couples and families – benefits from safer access to local services, green spaces, and schools. Lower travel stress and improved air quality enhance community wellbeing.
Pregnancy and maternity	Yes	Pregnant people and parents with infants benefit from lower emissions and safer crossings. Reopened Royal Hill/Blissett improves access without compromising the quiet side streets needed by young families. Pushchair users benefit from quieter crossings and future complementary improvements (e.g., kerb design).
Race	Yes	Safer and more accessible public space benefits ethnic minority residents, who are statistically more reliant on walking and public transport. Community cohesion can improve with more inviting public spaces and cleaner air. Reduced traffic and quieter streets may help to reduce the potential anxieties of race related harassment.

Religion or belief.	Yes	Places of worship are more accessible for walking or cycling. Levels of traffic being consistently lower could allow worshippers to feel more comfortable going to services, regardless of the time of day (lighting to be considered for those heading out for evening services).
Sex	Yes	Women, who more likely to walk, cycle, or use public transport, will benefit from safer, lower – traffic environments. Improvements to lighting and footpaths (to be explored through complementary measures) can address safety concerns night-time travel.
Sexual orientation	Yes	Safer, cleaner streets with lower traffic volumes support inclusivity. LGBTQ+ people, who may face greater concerns around public safety, benefit from efforts to create more welcoming environments. Complementary measures may further help make public space more inclusive.

3.2 Table3 summarises the potential negative impacts which may be experienced amongst the protected equalities groups of age, disability, pregnancy and maternity, ethnicity or race, religion or belief, sex/gender and sexual orientation.

**Table 3: Summary of Potential Negative Impacts on the Protected Groups**

Protected Characteristic	Is there a potential negative impact? (Yes or No)	Explain the potential negative impact
Age	Yes	<p>Proposals include 7-10am and 3-7pm Monday to Friday camera-enforced restrictions on motor traffic. While all properties remain accessible by car and exemptions apply to Blue Badge holders (Blue Badge holders able to register up to two vehicles instead of one) in RB Greenwich, taxis, private hire vehicles, and special cases, elderly residents may still be affected by route changes and increased journey times. Older drivers may not fully understand the impact of the restrictions</p> <p>The reopening of Royal Hill/Blissett Street may result in increased traffic volumes, which could negatively affect children travelling to and from the James Wolfe Royal Hill Campus. Continued monitoring of the impacts based on the decision will continue to be able to assess the impact clearly.</p>
Disability	Yes	<p>Disabled people are likely to be impacted by changes to familiar routes. However, Blue Badge holders (Blue Badge holders able to register up to two vehicles instead of one), taxis, private hire vehicles, are all proposed to be exempt, preserving access. For those with cognitive or sensory impairments, navigation new layouts may cause temporary stress. Individuals with neurodiverse processing may struggle with change which may come about through the restrictions.</p> <p>Complementary measures, including accessible kerbs, cleared signage, and public realm improvements, will be investigated to support disabled users.</p>
Gender reassignment	Yes	<p>While reduced traffic and increased walking can improve perceptions of safety, quieter streets – particularly at night – may increase anxiety for some trans and non-binary individuals. The potential for better visibility, and street design as part of complementary measures, will be key to addressing these concerns. There is currently no evidence of increased actual risk.</p>
Marriage/civil partnership	No	<p>Proposed measures are not expected to have a significant negative impact on this group. Access for all households is retained, and exemptions apply to common transport modes such as taxis and private hire vehicles.</p>
Pregnancy/maternity	Yes	<p>Pregnant people and new parents may rely on car travel more frequently for hospital visits or managing young children. Taxis and private hire vehicles are exempt, and all properties remain reachable through rerouting could introduce small delays. Access via Royal Hill/Blissett Streets further reduce disruption. Complementary measures – like wider footways and rest points – can support pushchair users and ease concerns about mobility.</p>

Race	Yes	No disproportionate negative impact is anticipated. Many residents from ethnic minority backgrounds rely on walking, buses, or taxis – the latter of which are exempt under the scheme. Improvements to air quality and safety support equality, and future design adjustments should continue to engage underrepresented voices. Quieter streets may provide some concerns to those who may feel they could be targeted and have less support from others who could intervene.
Religion or belief	No	Access to places of worship is not prevented, but some travel routes may change. Worshippers using taxis, or private hire vehicles will still be able to reach their destination, though detours may be needed for private vehicles of people who live outside of Neighbourhood Management Scheme area. No journeys are prohibited, and access by walking, cycling, and wheeling remains fully available.
Sex	Yes	While lower traffic volumes can reduce risk of collisions, quieter streets at night may increase the perception of vulnerability among women. Improvements in street visibility, and public presence, explored as part of complementary measures, will be important to maintaining confidence and safety in public space.
Sexual orientation	Yes	No specific or disproportionate impacts are expected. However, as with gender identity and sex, quieter streets at night may affect perceptions of safety for some LGBTQ+ individuals. Mitigation through lighting improvements is planned.

#### **4. Engagement - co-production, involvement or consultation with those affected**

4.1 Engagement and consultation has taken place during the development of proposals. This includes:

- West & East Greenwich Neighbourhood Management Project: Community Engagement Report: Stage One (West Greenwich)
- West & East Greenwich Neighbourhood Management Project: Community Engagement Report: Stage One (East Greenwich)
- West & East Greenwich Neighbourhood Management Project: Community Engagement Report: Stage Two (West Greenwich)
- West & East Greenwich Neighbourhood Management Project: Community Engagement Report: Stage Two (East Greenwich)

## 5. Informed decision-making

- 5.1 Several issues were raised during public consultation, which are summarised above and in the Community Engagement Reports for both neighbourhoods. In consideration of these issues and, if a decision is made to proceed with the proposals, RB Greenwich should address those issues which are deemed to have an overall negative impact on protected characteristic groups during the lifecycle of the trial of the project.
- 5.2 If the project is approved as a trial, the new traffic management would be implemented under an Experimental Traffic Order (ETO). This allows Officers to monitor the positive and negative impacts of project proposals, including gathering further feedback from residents and stakeholders. Based on the information collected, further changes could be made subject to further

## 6. Action planning

- 6.1 Table 4 includes the actions that will be taken following a decision being made to implement the proposed schemes, covering both East West and East Greenwich.

**Table 4: Action Plan**

Recommended Task	Due	Recommended Owner
Finalise and publish a comprehensive exemptions policy including existing and new exemptions (e.g. Blue Badge holders (Blue Badge holders able to register up to two vehicles instead of one), taxis, PHVs). Ensure this is communicated clearly at all stakeholders.	Prior to implementation of permanent scheme	Greenwich Council
Establish and publicly share a monitoring plan that tracks impacts on air quality, traffic displacement.	Prior to implementation of permanent scheme	Greenwich Council
Ensure that Road Safety Audits are completed for all areas affected by changes traffic patterns (e.g. Royal Hill/Blissett reopening) and for side roads intended to be protected.	Prior and after implementation	Greenwich Council
Investigate and develop complementary measures to support active travel, accessibility, and perceptions of safety. This may include clearer signage, improved crossings, and accessibility features (e.g. dropped kerbs, tactile paving).	After implementation of permanent scheme	Greenwich Council
Undertake post-decision Equalities Review, aligned with the one-year monitoring process, to assess how changes to hours and exemptions may impact protected groups under the Equality Act 2010, and identify any additional mitigations.	After one year of the scheme being permanent	Greenwich Council

<sup>1</sup> *Due regard* is a legal requirement and means that decision-makers have to consider the equality implications of a proposal before a commissioning or policy decision has been made that may affect people who share each of the protected characteristics. Paying 'due regard' means giving a proportionate amount of resource to this analytical exercise relevant to the potential impact on equality.

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<sup>2</sup> *This is the legal term in the Equality Act. In practice, there are specific legal protections for a diverse range of people who have physical, mental and sensory impairments, long-term health conditions and/or neurodivergence, as well as carers who provide unpaid care for a friend or family member who cannot function without their support. Census and local datasets use the Equality Act definition and will include people who may not use the language of disability to describe themselves.*

<sup>3</sup> *This is the legal term in the Equality Act. In practice, there are specific legal protections for anyone whose gender identity does not match the sex they were assigned at birth. This means, for example, that people who are trans and people who are non-binary or gender fluid are considered a specific protected group under the Equality Act.*

<sup>4</sup> [Microsoft Power BI](#)

<sup>5</sup> [The people cycling in London are more diverse than ever - Transport for London](#)