Appendix F

EQIA for Hackney Transport Strategy (2026-2036)

Introduction:

This document is a standalone Equality Impact Assessment (EqIA) to support the *Hackney Transport Strategy 2026–2036*. It considers the potential equality impacts of the Strategy's policies and objectives, drawing on the Council's wider evidence base and related assessments.

SECTION 1: Purpose, Context and Governance Framework

1.1 Statutory Context & Purpose of this Assessment

This Equality Impact Assessment (EqIA) evaluates the overarching borough-wide policy framework set out in the *Hackney Transport Strategy 2026–2036*. Hackney Council and its delegated decision-makers must fulfil the Public Sector Equality Duty (PSED) under Section 149 of the Equality Act 2010. This statutory duty requires the Council to have due regard to the need to:

1. **Eliminate discrimination, harassment, victimisation**, and any other conduct prohibited by or under the Equality Act 2010.
2. **Advance equality of opportunity** between persons who share a relevant protected characteristic and persons who do not share it.
3. **Foster good relations** between persons who share a relevant protected characteristic and persons who do not share it.

Beyond statutory requirements, this assessment incorporates Hackney Council's voluntary commitment under its *Equality Plan 2024–2026* to evaluate impacts on **Socio-Economic Deprivation** (the Socio-Economic Duty) and to treat **Care Experience** as if it were a protected characteristic.

1.2 Relationship Between the Strategy EqIA, Site-Specific EqIAs, and Consultation Standards

This EqIA assesses the high-level policy directions, targets, and strategic clusters contained within the 10-year Strategy. It serves as an overarching umbrella document. It **does not replace** the legal requirement to undertake detailed, site-specific EqIAs for individual traffic management, street design, or other transport interventions prior to implementation decisions. While Experimental Traffic Orders (ETOs) were used extensively for emergency pandemic-era street schemes, current policy relies primarily on pre-decision consultation and vision-led planning, reserving experimental orders for specific ongoing trials or complex street management pilots.

1.3 Summary of the Hackney Transport Strategy 2026–2036

The Hackney Transport Strategy 2026–2036 establishes a long-term framework to create a safe, fair, and healthy transport system. The Strategy is structured around three core pillars and ten strategic chapters:

- **Part A: Transport Core:** Covers borough connections, traffic reduction targets (seeking a 15.6% reduction in motor vehicle kilometres by 2041), healthy street design, car-free planning, public transport enhancements (including step-free rail upgrades and bus priority), and sustainable freight logistics.
- **Part B: Environmental & Social Costs:** Focuses on Vision Zero road danger reduction (working towards eliminating deaths and serious injuries), personal security (tackling street harassment and anti-social behaviour), climate adaptation (e.g. urban shading and blue-green drainage), and air quality improvements to meet World Health Organisation (WHO) guidelines.
- **Part C: Transport Equity:** Addresses physical accessibility for mobility-impaired residents, child-friendly urban design (independent mobility and School Streets), and transport affordability (e.g. concessions, dockless bike tariffs, and community cycling).

SECTION 2: Evidence Base Extracts & Local Demographic Context

This assessment draws directly upon the Council's standard *Equalities Evidence Base (2026)*, Hackney Equalities Imapct Assessment Evidence Base 2026 which synthesises the ONS Census 2021, TfL London Travel Demand Survey (LTDS)

multi-year data, and local health and casualty monitoring.

2.1 The Hackney Baseline: High Sustainable Travel & Low Vehicle Access

Hackney's demographic and transport baseline creates a distinct context for equality analysis:

- **Car-Free Majority:** Approximately **65% of households in Hackney do not own or have access to a car or van** (ONS Census 2021). This compares to an inner-London average of 42% and a national average of 22%. In high-density southern wards (e.g., Hoxton, Shoreditch), household car-free rates reach 75% to 82%.
- **High Sustainable Mode Share:** 88% of daily trips by Hackney residents are made by walking, wheeling, cycling, or public transport, with only 12% made by private motor vehicle or taxi. Active travel (walking and cycling) accounts for 60% of resident trips, which is the highest rate in London.
- **High Population Density & Youth Profile:** Hackney is the third most densely populated local authority in England. It has a young age profile (42% aged 20–39), though residents aged 50–64 represent the fastest-growing demographic (up 37.5% since 2011).
- **Deprivation & Inequality:** Hackney ranks as the 27th most deprived local authority in England. Transport costs represent a significant burden for low-income households, where vehicle ownership is economically non-viable for the vast majority (only 23% of London households earning under £10,000 have car access, compared to 78% earning £100,000+).

2.2 Key Protected Group Travel Patterns & Barriers

Demographic / Group	Local Baseline & Key Travel Evidence (Evidence Base 2026)	Primary Transport Barriers & Vulnerabilities
Disability & Mobility Impairments	14.3% of residents (~37,100 people) identify as disabled under the Equality Act. Local data confirms that **76% of disabled residents in**	Inaccessible rail stations (56% lack step-free access nearby), footway clutter (e.g. dockless bikes, illegal parking), lack of street

Demographic / Group	Local Baseline & Key Travel Evidence (Evidence Base 2026)	Primary Transport Barriers & Vulnerabilities
	Hackney do not hold a Blue Badge. Disabled residents rely primarily on walking/wheeling (58% of trips) and buses (23% of trips). Only 11% drive a car.	seating, and fear of traffic danger. Car-dependent disabled residents face routing inconvenience from restrictions.
Carers & Care Responsibilities	Some 7% of Hackney residents provide unpaid care to friends or relatives. The Census 2021 defines unpaid carers specifically as individuals providing uncompensated care for family or neighbours with long-term health conditions or age-related needs.	Carers carry out complex, multi-stop trips chains combining domestic, medical, and escort duties. Informal or non-professional carers risk travel delays if driving routes are filtered without essential access arrangements.
Race & Ethnicity (Global Majority)	47% of residents belong to Black and Global Majority groups (21.1% Black, 10.4% Asian, 6.7% Mixed, 8.7% Other). Black Londoners have the highest bus reliance (28% of trips vs 14% for White residents). Asian households nationally and regionally have higher car availability (79%) than Black (60%) or Mixed groups.	Lower participation rates in cycling due to storage/safety barriers, and higher reliance on bus speeds and affordability. Asian households report higher driving frequencies for multi-generational care.
Age: Children (0–15)	Children make up 20% of the borough population. 52% walk	Road traffic danger during independent travel, exposure

Demographic / Group	Local Baseline & Key Travel Evidence (Evidence Base 2026)	Primary Transport Barriers & Vulnerabilities
	to school, 25% take the bus, and 14% travel as car passengers. Over **95% of child road casualties in Hackney occur among families living in the poorest 50% of areas**.	to vehicle exhaust emissions at pram height (PM2.5 and NO2), and lack of safe, incidental outdoor play spaces.
Age: Older People (65+)	Represent 9% of residents. Older residents demonstrate high bus reliance (40% of trips) and walking (43% of trips), with very low cycling rates (1%). They face disproportionate fatality risks in road traffic collisions.	Pavement defects, lack of resting benches, fast-changing pedestrian signals, reduced bus service frequencies, and fear of street crime/anti-social behaviour after dark.
Religion & Belief	30.7% Christian, 13.3% Muslim, 6.7% Jewish (Charedi community concentrated in Stamford Hill), 36.1% No Religion. The Charedi community features large family sizes and intensive walking on Shabbat/holidays when motor travel is prohibited.	Pedestrian overcrowding on footways during religious observance, safe crossing points near places of worship, and multi-generational family transport needs during weekdays.
Gender & Personal Safety	51.5% female. Women have lower access to private cars than men, make more complex trip chains (caring/escort journeys), and rely heavily on	Fear of street harassment, Violence Against Women and Girls (VAWG), poor street lighting, and unmonitored public realm

Demographic / Group	Local Baseline & Key Travel Evidence (Evidence Base 2026)	Primary Transport Barriers & Vulnerabilities
	buses and walking.	spaces after dark.

2.3 Data Gaps, Disaggregated Boundary Road Data, and Legal Robustness

This EqIA addresses the limitations of borough-wide averages and small sample sizes and sets out the approach to data quality:

- **Limitations of LTDS Survey Sub-Slices:** The Council acknowledges these statistical limitations, treats single-year survey figures with appropriate analytical caution, and validates survey trends against full Census enumeration and multi-year pooled data.
- **Requirement for Disaggregated Boundary Road Data:** To ensure robustness under Section 149 of the Equality Act 2010, strategic-level assertions must be validated at the project level. For all individual scheme-specific EqIAs, the Council collates localised, ward-level Census data and disaggregated boundary road demographic data (including local social housing, council-managed housing estates, healthcare receptors, and school locations) rather than relying exclusively on aggregated borough averages.

SECTION 3: Stakeholder Engagement and Consultation

The Hackney Transport Strategy 2026–2036 was developed through a programme of engagement designed to ensure the lived experiences of protected groups directly shaped policy goals:

3.1 Overview of Engagement Phases

- **Initial Public Engagement (2025):** A 12-week public engagement exercise receiving 1,437 responses, capturing broad attitudes toward traffic reduction, street safety, air quality, and public realm priorities.
- **Targeted Equalities Focus Groups:** Dedicated qualitative workshops held with under-represented groups, including older residents, disabled people, young

people, and local faith representatives. Libary drop-in. Resident and tennants groups

- **Deliberative Engagement Panel on Main Roads:** An independently facilitated, representative panel of 21 Hackney residents working with LSE Cities academic experts to examine the trade-offs on busy main road corridors.
- **Key Equalities Stakeholders Contacted:** Direct policy input was sought from representative organisations, including Age UK East London, Disability Backup, Transport for All, Cycle Sisters, the Jewish Community Council, Living Streets, Campaign for Better Transport, RNIB, Society for Neurodiversity, ADHD Foundation, Disability Backup, Hackney Learning Disability Forum; Choice in Hackney and local primary and secondary schools.

3.2 Key Feedback Themes & How They Shaped the Strategy

- *Conflict Between Pedestrians and Cyclists:* Older and visually impaired residents raised strong concerns regarding footway cycling, dockless e-bikes parked obstructively, and shared-use paths. **Council Response:** Objective C6 (Considerate Cycling) mandates considerate cycling enforcement; Objective EQ2 (Affordable Access to Bicycles) requires managed dockless bays; and footway cycling promotion is explicitly rejected in favour of carriageway segregation.
- *Essential Vehicle Access & Carer Needs:* Disabled residents and carers expressed concern that traffic filters could increase travel times for essential medical and care journeys. **Council Response:** Objectives Access 5 (Innovative Exemptions) and EQ7 (Innovative Exemptions) embed the **HAC01 Companion Permit** (exempting Blue Badge holders from filters) and digital whitelisting for Taxicard vehicles.
- *Bus Service Reliability:* Low-income and older residents emphasised that traffic delays on main roads impact on bus dependability. **Council Response:** Objectives PT6 (Bus Networks) and PT7 (Bus Reliability) prioritise 24/7 bus lanes, signal priority technology, and lane rental charges for roadworks.

3.3 Consultation Feedback: Representation, Carer Needs and Main Road Concerns

Public feedback on transport schemes frequently involves active campaign groups claiming that traffic restrictions "harm disabled people" or "isolate carers." Equality analysis requires distinguishing between public commentary and statutory definitions:

- **Representation and Lived Experience:** Research by *Transport for All* notes that

non-disabled objectors sometimes invoke disabled people or carers generically to oppose traffic schemes, without representing disabled residents themselves. The Council bases its assessment directly on data from disabled Londoners and representative disability bodies (e.g., Disability Backup, Transport for All). In Hackney, 76% of disabled residents do not hold a Blue Badge and stand to gain directly from quieter streets, improved pavement accessibility, and reliable bus services.

- **Informal Carers vs. Census Definitions:** Under the Census 2021, an "unpaid carer" is defined as someone caring for a family member or neighbour with a long-term disability, illness, or old age. Public consultation feedback often uses "carer" loosely to include parents driving healthy children or residents making domestic favours. While the Council prioritises essential access for genuine unpaid carers and professional care workers, general domestic driving cannot be granted blanket filter exemptions without compromising street safety and air quality goals.

Engagement also raised concerns that traffic filtering could increase traffic, congestion or air pollution on boundary main roads, including locations where Black and Global Majority communities, social housing tenants and lower-income households live. These concerns are considered further against traffic, queueing and air-quality evidence in Section 5.

3.4 Consultation Standards

To ensure procedural fairness and satisfy statutory expectations,all scheme-level consultations, whether conducted prior to permanent Traffic Regulation Orders (TROs) or during occasional experimental trials, adhere strictly to the four **Gunning Principles**:

- **Gunning 1: Proposals at a Formative Stage:** Scheme proposals remain at a formative stage throughout consultation, with decision-makers maintaining an open mind.
- **Gunning 2: Sufficient Information for Intelligent Consideration:** Clear, accessible information regarding scheme objectives, local traffic and air quality data, accessibility arrangements, and permit exemption criteria (e.g., HAC01 companion permits) is published to enable informed consideration.
- **Gunning 3: Adequate Time for Consideration and Response:** Adequate time is provided, including the six-month statutory period for representations on an experimental order and the applicable statutory period for permanent TROs for

residents, disabled road users, carers, emergency services, and local businesses to respond.

- **Gunning 4: Conscientious Consideration of Outcomes:** All consultation responses, live monitoring metrics, and updated site-specific EqIAs are conscientiously considered before determining whether to make a scheme permanent, modify it, or remove it.

SECTION 4: Strategic Policy Clusters Assessment

To evaluate the Strategy's 95 individual objectives comprehensively, the objectives are grouped into **6 Strategic Policy Clusters** aligned directly with the structure of the Strategy document. For full readability without requiring prior knowledge of the main document, all objective titles are written out in full below.

Note on Scope: This cluster assessment provides a strategic-level assessment of the likely equality implications of the Strategy. It does not replace the requirement for scheme-specific EqIAs for future individual projects.

Cluster 1: Movement & Development Planning (Part A: Chapters 1 & 3)

Objectives Covered:

Move 1: Connecting | *Move 2: Healthy Streets* | *Move 3: Main Roads* | *Move 4: Road User Hierarchy* | *Move 5: Traffic Levels* | *Move 6: Modal Share* | *Move 7: Sustainable Modes* | *TR 1: Traffic Reduction* | *TR 2: Tackling Congestion* | *TR 3: Reallocate Carriageway Space* | *TR 4: Parking Management* | *TR 5: Autonomous Technology* | *TR 6: Road Safety Premium* | *Develop 1: Climate Change and Clean Air* | *Develop 2: Sustainable Development* | *Develop 3: Vision-Led Approach* | *Develop 4: Placemaking and Regeneration* | *Develop 5: Healthy Streets* | *Develop 6: Managing Transport Impacts* | *Develop 7: Car Free Development and Efficient Use of Street Space* | *Develop 8: Travel Planning and Behaviour Change* | *Develop 9: Inclusive Growth and Future Readiness* | *Develop 10: Planning Contributions and Mitigation*

- **Potential Positive Impacts:** Achieving a 15.6% overall reduction in vehicle kilometres by 2041 (Move 5) and enforcing car-free development (Develop 7) lowers traffic volume, road danger, and air pollution. This proportionately benefits non-driving households, children, and residents in council-managed social

housing estates. Those elderly or disabled people who remain dependent on cars for some trips can benefit from decreased journey times in the road space that has been freed up.

- **Potential Adverse Impacts:** Point closures and modal filters can result in longer or less direct driving routes, creating travel inconvenience for car-dependent disabled residents, non-professional carers, and families managing complex care journeys. Some mobility impaired people may continue to be dependent on motorised modes to an extent and their needs would need to be taken into account through discounts and exemptions for any proposed scheme. This would enable them to fully benefit from the road danger reduction, air quality and decongestion benefits which would be the key aim of any Road Safety Premium scheme. In addition, behaviour change, which the Road Safety Premium is designed to achieve, may be more difficult among groups with large families such as the Charedi Jewish population, who in some cases are currently quite car dependent.
- **Mitigation Measures:** Objective EQ7: Innovative Exemptions provides targeted access arrangements via the **HAC01 Disability Companion Permit** and Taxicard exemptions, while maintaining essential vehicular access to all properties in the borough. While modal filters alter general vehicular access, dedicated continuous liaison with the London Ambulance Service, Metropolitan Police, and London Fire Brigade ensures ANPR whitelisting and physical camera-enforced filter design maintain unhindered emergency response times across all residential quarters.

Cluster 2: Active Travel & Public Realm (Part A: Chapters 1 & 2)

Objectives Covered:

W 1: Walking Mode Share | *W 2: World Class Walking Environment* | *W 4: Walking Promotions* | *C 1: Cycling Share* | *C 2: New Cycle Network* | *C 3: Cycle Parking* | *C 4: Cargo Bikes* | *C 5: Cycle Hire* | *C 6: Considerate Cycling* | *C 7: Cycle Promotion* | *HS 1: Healthy Streets* | *HS 2: World Class Walking Environment* | *HS 3: New Cycle Network* | *HS 4: Safer Streets* | *HS 5: Cleaner Air* | *HS 6: Reallocate Carriageway Space*

- **Potential Positive Impacts:** Reallocating carriageway space for wider pavements, improved smooth crossings, seating, and tree shade (HS 2, W 2). Health, congestion relief and air quality benefits for all groups (C1 through to C7 and W1, W 2 and W 4) directly removes barriers for the **76% of disabled residents who do not hold a Blue Badge**, older residents, and parents with

prams.

- **Potential Adverse Impacts:** Inappropriately parked dockless bikes or cargo bikes risk obstructing footways, creating severe hazards for visually impaired or mobility-impaired pedestrians. Access to micro-mobility can be limited to smart-phone users.
- **Mitigation Measures & Detailed Analysis of HAC01 Permit Effectiveness:** Enforcing dockless parking bay compliance (EQ2), promoting considerate cycling (C6), and applying *Inclusive Mobility* design standards across all schemes (HS1, HS2). Liaison with, and support for, modes with alternatives to smartphone use. Reallocating kerbside space explicitly prioritises the systematic installation of flush dropped kerbs, tactile paving at all informal crossings, and high-contrast street furniture placement to remove physical trip hazards for visually impaired and wheeling residents.

Detailed PSED Analysis of HAC01 Effectiveness:

In evaluating PSED compliance, the Council has specifically analysed whether the HAC01 Companion Permit framework and associated mitigations offset disproportionate travel time and financial impacts for car-dependent disabled residents. HAC01 permits provide free filter exemptions across key classified road restrictions (including Chatsworth Road, Stoke Newington Church Street, Shepherdess Walk, Downs Road, Lansdowne Drive, Richmond Road, Whiston Road, and Amhurst Road). By exempting eligible Blue Badge holders at these primary boundary points, the permit directly mitigates the most substantial potential journey delays and detour distances across the borough's road network.

The HAC01 permit is provided free of charge to eligible Hackney Blue Badge holders. To address transport poverty among non-driving disabled residents reliant on door-to-door transport, the Council's automated Taxicard exemption allows licensed taxis carrying Taxicard passengers to traverse HAC01 filters, preventing additional meter fare accumulation caused by re-routing.

The Council recognises that HAC01 permits do not apply to every unclassified residential street filter. As a result, some car-dependent disabled residents or visitors may experience localised routing detours on secondary residential roads. While HAC01 permits substantially reduce strategic travel delays, they do not fully eliminate localised re-routing in every instance. The Council has evaluated whether opening all residential filters to permit holders would be appropriate;

evidence demonstrates that granting universal filter access would generate high vehicle flows on quiet streets, compromising road safety, air quality, and footway independence for the 76% of disabled residents in Hackney who do not hold a Blue Badge and rely on walking, wheeling, or buses. The restricted scope of HAC01 permits represents a balanced, proportionate intervention that alleviates major strategic travel delays while safeguarding the quiet street environment necessary for active and accessible travel.

Cluster 3: Public Transport & Connectivity (Part A: Chapter 1)

Objectives Covered:

PT 1: Accessible Stations and Stops | *PT 2: Crossrail 2* | *PT 3: Overground* | *PT 4: Interchange* | *PT 5: Station Upgrades* | *PT 6: Bus Networks* | *PT 7: Bus Reliability* | *PT 8: Autonomous Public Transport*

- **Potential Positive Impacts:** Delivering Step-Free Access across rail stations (PT1: Accessible Stations and Stops) directly addresses the borough's accessibility gap. Protecting bus speeds (PT6: Bus Networks, PT7: Bus Reliability) advances equality for Black Londoners (28% bus mode share), older residents (40%), young people (35%), and low-income groups.
- **Potential Adverse Impacts:** Temporary traffic displacement during major highway construction could cause minor delays to bus routes if unmitigated. Crowding on mixed gender buses raises concern for some communities.
- **Mitigation Measures:** Real-time bus signal priority, 24/7 bus lane protections, and a policy commitment against permanent bus route diversions (PT7: Bus Reliability). Liaison with TfL to ensure appropriate service levels. Protecting bus speeds is paired with kerbside height upgrades at bus stops and regular seating intervals along primary walking routes to support older residents and people with chronic fatigue or respiratory conditions.

Cluster 4: Deliveries, Freight & Servicing (Part A: Chapters 1 & 7)

Objectives Covered:

DS 1: Reduce, Retime, Remode | *DS 2: Pick up/Drop Off* | *DS 3: Transport Planning Interventions* | *DS 4: Gig Economy* | *DS 5: Hackney Fleet* | *DS 6: Autonomous Freight* | *TR 5: Autonomous Technology* | *AQ 4: Zero Emissions Network*

- **Potential Positive Impacts:** Retiming freight and shifting Light Goods Vehicles (LGVs) to zero-emission cargo bikes (DS1: Reduce, Retime, Remode) reduces

HGV/LGV road danger and diesel pollution in residential streets.

- **Potential Adverse Impacts:** Unregulated Autonomous Vehicles (TR5: Autonomous Technology) or sidewalk delivery technology (DS6: Autonomous Freight) could create unexpected pavement obstructions or collision hazards.
- **Mitigation Measures:** Implementing strict kerbside regulation, designated last-mile loading bays, and prioritising pedestrian movement on footways (DS6: Autonomous Freight).

Cluster 5: Safety, Health & Environment (Part B: Chapters 4, 5, 6 & 7)

Objectives Covered:

Safe 1: Vision Zero | *Safe 2: Safe Streets* | *Safe 3: Safe Speeds* | *Safe 4: Safe Vehicles* | *Safe 5: Safe Behaviours (Education and Training)* | *Safe 6: Safe Behaviours (Enforcement)* | *Safe 7: Post Collision Response* | *Safe 8: Reduce Crime and Anti-Social Behaviour in Public Spaces* | *Safe 9: Reduce Crime and Anti-Social Behaviour on the Transport Network* | *Healthy 1: Transport and Health* | *Healthy 2: Active Travel Exercise* | *Healthy 3: Active Travel Trips* | *Healthy 4: Targeted Active Travel Campaigns* | *Climate 1: Lowering Carbon Emissions* | *Climate 2: Increasing Low Emission Transport* | *Climate 3: A Bluer and Greener Public Realm* | *Climate 4: Enhancing Urban Greening, Protecting the Urban Forest* | *AQ 1: Pollution Reduction* | *AQ 2: EV Uptake* | *AQ 3: Low/Zero Emission Transport* | *AQ 4: Zero Emissions Network* | *AQ 5: Hackney Fleet*

- **Potential Positive Impacts:** Vision Zero casualty targets (Safe 1: Vision Zero) address severe socio-economic disparities, given that **over 95% of child road casualties in Hackney occur in the poorest half of households**. Achieving WHO air quality guidelines (AQ1: Pollution Reduction) and climate shading (Climate 4: Enhancing Urban Greening) protects infants, pregnant mothers, and elderly residents. Tackling street harassment (Safe 8, Safe 9) enhances personal safety for women and girls. Cleaner Air will be particularly beneficial to young children and elderly people with chronic health conditions.
- **Potential Adverse Impacts:** Timed motor vehicle restrictions outside schools (School Streets) may cause localised traffic redistribution onto nearby roads during pick-up and drop-off windows. Timings at some school streets may not suit local faith schools.
- **Mitigation Measures:** Complementing School Streets with wider neighbourhood active travel upgrades and safe walking routes across the broader school run (CF2: Journey to School). Liaison with neighbouring non-state schools.

Restricting motor vehicles outside school gates during drop-off and pick-up hours directly reduces pram-height particulate emissions (PM2.5} while creating a safe physical environment that encourages active travel habits from early childhood.

Cluster 6: Transport Equity, Inclusion & Affordability (Part C: Chapters 8, 9 & 10)

Objectives Covered:

Access 1: Support Inclusive and Healthy Street Design | *Access 2: Accessible Stations and Stops* | *Access 3: Accessible Locations and Routes to Health and Education* | *Access 4: Affordable Access* | *Access 5: Innovative Exemptions* | *CF 1: School Streets* | *CF 2: Journey to School* | *CF 3: Access to Parks and Playspace* | *CF 4: Reduce Child Casualties* | *CF 5: Child-Friendly Foundation* | *EQ 1: Affordable Public Transport* | *EQ 2: Affordable Access to Bicycles* | *EQ 3: Active Travel Networks* | *EQ 4: Equitable Main Roads Network* | *EQ 5: Reduce Active Travel Inequality* | *EQ 6: Affordable Access* | *EQ 7: Innovative Exemptions* | *EQ 8: Child-Friendly* | *EQ 9: Ageing Well*

- **Potential Positive Impacts:** Supporting travel concessions (Freedom Pass, Dial-a-Ride, Taxicard) and lobbying for affordable bus/rail fares (EQ1, Access 4) mitigates transport poverty. Innovative permit exemptions (Access 5, EQ7) safeguard mobility for Blue Badge holders and carers. (EQ 9) age-friendly transport system as additional support for considering the needs of older people in transport system planning. New Step stations will be of particular benefit to older and disabled residents and those using prams and pushchairs to travel around the borough. (Access 2).
- **Potential Adverse Impacts:** High-quality public realm investments can contribute to perceptions of neighbourhood gentrification if not paired with broader social housing and community support.
- **Mitigation Measures:** Distributing active travel and public realm investments equitably across social housing estates and high-deprivation wards.

SECTION 5: Intersectional Analysis, Social Equity, and Main Roads Impact

5.1 Intersectional Impact Analysis

In accordance with Hackney's EqIA Guidance, this assessment evaluates

overlapping protected characteristics to identify compounded disadvantages, including:

- **Low-Income Disabled Residents:** Disabled residents living in lower-income households or council-managed social housing face compounded barriers, for example facing difficulty to afford private vehicle adaptations or taxi fares while encountering physical accessibility gaps on public transport. The Strategy addresses this by prioritising step-free station upgrades (PT1: Accessible Stations and Stops) and protecting free/subsidised travel schemes (Freedom Pass, Taxicard) (Access 4: Affordable Access).
- **Older Women & Night-Time Personal Security:** Older women who do not drive face dual concerns regarding physical mobility (requiring dropped kerbs and benches) and personal safety after dark. Objectives Safe 8, Safe 9, and W2: World Class Walking Environment pair physical street design (improved lighting, clear sightlines) with bus stop safety interventions. Recognising that women carry out disproportionate off-peak multi-stop caring journeys, public realm interventions prioritize street lighting upgrades, vegetation management to preserve sightlines, and enhanced natural surveillance around public transport interchanges.
- **Multi-Generational South Asian & Faith Communities:** Large households who are in the minority who drive, while carrying out multi-stop care, grocery, or religious trips, may face potential inconvenience from traffic filters. The Strategy addresses this through targeted filter companion permits (HAC01) and maintaining full property access. Traffic management schemes aim to accommodate local pedestrian surges during peak faith observances such as Friday prayers at local mosques and Shabbat walking movements in Stamford Hill. To maintain footway width capacity and safe signalised crossing opportunities.

5.2 Main Roads, Residential Streets and Social Equity

A key concern raised about Low Traffic Neighbourhoods (LTNs) is that filtering residential streets could displace traffic, congestion and air pollution onto boundary main roads, including areas where Black and Global Majority communities, social housing tenants and lower-income households live. Because lower-income households rely heavily on bus travel along main road corridors, active signal priority and dedicated bus lanes are deployed to prevent displaced general traffic from increasing bus delay times for non-car-owning residents. The Strategy therefore considers demographic evidence alongside traffic, queueing and air quality

monitoring.

1. Traffic, air quality and demographic evidence

Long-term monitoring of implemented Low Traffic Neighbourhoods (LTNs) in Hackney indicates an overall reduction in vehicle kilometres rather than simple one-for-one displacement of traffic. Monitoring includes continuous traffic counters, automatic number plate recognition (ANPR) and queue-length surveys at boundary junctions. Localised increases in queues can occur during implementation, but these can reduce as travel patterns change.

Hackney's air quality monitoring network, covering more than 100 nitrogen dioxide (NO_2) and particulate monitoring sites, shows that roadside NO_2 levels have fallen significantly between 2017 and 2026. The number of sites where mean NO_2 exceeded national objectives fell from 46 in 2017 to one by 2024. Monitoring and modelling are used to assess whether changes in traffic patterns result in sustained changes in air quality on boundary roads.

Research led by the University of Westminster and other universities has also examined the distribution of LTNs and their effects across London. This research indicates that residents within filtered areas are not, on average, disproportionately affluent compared with the wider population. In Hackney, a higher proportion of Global Majority and low-income residents live within filtered residential areas than on main road corridors. Research also indicates that initial traffic displacement can reduce over time as travel patterns change.

2. Limitations of local socio-economic data

Area-wide evidence cannot identify every difference between individual streets or households. Census and Index of Multiple Deprivation (IMD) data are generally available at area level, including Lower Super Output Areas (LSOAs), rather than individual properties. Even small unit postcodes can contain different housing types and street environments, making it difficult to assess exposure at individual property level.

Changes in Hackney's population and housing also mean that historic deprivation and Census data may not fully reflect current circumstances. Areas with historically high levels of deprivation may now contain a mixture of long-standing lower-income households and higher-income private residents.

3. Ongoing monitoring and the Main Roads Strategy

The Council does not assume that lower-income residents should bear higher environmental burdens, or that strategic-level data will capture every local

circumstance. Scheme-specific EqIAs will therefore supplement borough-wide data with local street audits, council housing estate mapping, healthcare receptors and direct air quality monitoring where appropriate. The Council will also continue to seek more detailed data with TfL, academic institutions and other research partners.

The Strategy's Main Roads Strategy (Objectives Move 3: Main Roads and EQ4: Equitable Main Roads Network), supported by a 21-resident Deliberative Panel, provides a specific focus on main road corridors. It includes measures such as bus priority, signal optimisation, urban greening and improved pedestrian crossings, particularly where council housing estates and small businesses are located.

SECTION 6: Traffic Filter Exemptions Policy & Balancing Statement

6.1 Policy Framework for Traffic Filter Exemptions

A central policy consideration in Liveable Neighbourhoods and LTNs is the design of traffic filter exemptions. The Council recognises the value of exemptions for specific, highly vulnerable user groups. However, to maintain the integrity of traffic reduction goals, air quality improvements, and pedestrian safety, the exemption criteria must be carefully calibrated and kept under review.

- **The HAC01 Companion Permit Policy:** The Council provides targeted filter exemptions via the digital HAC01 Companion Permit. Eligible groups include Hackney Blue Badge holders, taxis transporting registered Taxicard passengers, Special Educational Needs and Disabilities (SEND) transport, and emergency services. This directly mitigates routing inconvenience for car-dependent disabled residents and specialist transport.
- **Maintaining Scheme Integrity (Why General Resident Exemptions Are Excluded):** As formally set out in Council decision reports (e.g., the *Chatsworth Road Liveable Neighbourhood Statutory Objection Report*), general exemptions cannot be granted to all local residents or specific postcodes. Granting general resident exemptions would preserve high volumes of private vehicle trips, induce localised traffic congestion, and defeat the core public health aims of traffic evaporation, road safety, and air quality reduction. Every property in restricted areas retains full vehicular access, although specific driving routes may vary based on local geography.
- **Informal Carer Access Arrangements:** While professional care vehicles and

registered community transport can receive automated access, general unverified "carer" exemptions are excluded to prevent widespread exemption misuse. Carers visiting residents retain full motor access via alternative unrestricted street routes, while emergency medical visits are protected via the Council's justifiable journey PCN appeals framework. Where unscripted medical or urgent care visits require vehicular access by non-HAC01 permit holders through enforced filters, the Council's statutory Penalty Charge Notice (PCN) representations framework provides formal, case-by-case discretion to cancel penalties upon proof of care provision.

- **Evaluation of Exemption Balance, Cost, and Travel Time:** Under Section 149 of the Equality Act 2010, the Council has evaluated the degree to which current exemption policies address potential financial and travel time disadvantages. The HAC01 permit is issued without administration fees. For disabled residents who do not drive but rely on cabs, Taxicard whitelisting ensures taxi trips through HAC01 filters do not incur inflated distance-based fares. By focusing HAC01 exemptions on classified bus gates and high-volume corridor filters, the policy eliminates major multi-mile detours. Where exceptional, unscripted medical or emergency journeys occur in non-permitted vehicles through enforced filters, the Council's "justifiable journey" PCN appeals process provides a formal recourse mechanism to review penalty notices on a case-by-case basis.

6.2 Statutory Frameworks

This assessment balances two distinct legal frameworks:

1. **The Public Sector Equality Duty (Section 149, Equality Act 2010):** Requiring conscious, rigorous consideration of equality impacts, eliminating discrimination, and advancing opportunity for protected groups.
2. **Highways & Traffic Legislation (e.g., Road Traffic Regulation Act 1984):** Requiring local highway authorities to exercise functions to secure the expeditious, convenient, and safe movement of traffic, while having regard to local amenity and environmental protection.

6.3 Formal Assessment of Proportionality and Balance of Public Benefit

SUMMARY OF ASSESSMENT
1. STRATEGIC CONTEXT: The Strategy seeks to improve safety, air quality, and public transport in a borough where 65% of households do not own cars.
2. RECOGNISED IMPACTS: Traffic management and filtering may result in increased journey times or complexity for certain car-dependent users.
3. MITIGATION APPROACH: Essential access is supported through targeted exemptions (HAC01 permits, Taxicard whitelisting) and Blue Badge bays.
4. SCHEME-LEVEL REVIEW: The Strategy provides a framework for decision-making; individual interventions will undergo scheme-specific EqIAs.

The Council recognises that strategic transport measures such as modal filtering, point closures, and parking space reallocation can produce varied impacts across different communities. While such measures support general public health, road safety, and environmental objectives, they can also create additional travel distance or complexity for specific cohorts, including car-dependent disabled residents, carers, or families with complex domestic travel needs.

To address these impacts, the Strategy embeds targeted mitigations, including:

- The **HAC01 Companion Permit** scheme and **Taxicard Exemption**, providing filter access for eligible Blue Badge holders and mobility-impaired residents.
- Retaining designated Blue Badge parking spaces and ensuring provision for essential vehicle access to properties, subject to scheme-specific arrangements.
- Prioritising bus speed and reliability to protect non-driving households from transport poverty.

The Council considers that the Strategy provides a framework for addressing identified equality impacts through proportionate mitigation and scheme-specific

assessment. Individual schemes will require further consideration of their specific impacts, including any potential disadvantage to particular protected groups, before decisions are taken.

SECTION 7: Action Plan, Quality Assurance and Monitoring

7.1 Equalities Action Plan

Identified Risk / Impact	Mitigation Action Required	Lead Officer / Service	Target Timeline	Monitoring Metric
Dockless e-bike clutter obstructing footways for visually/ mobility-impaired pedestrians.	Enforce mandatory dockless parking bays, mandate geofencing, and implement swift operator removal penalties.	Streetscene / Parking Services	Ongoing (Quarterly Review)	Number of obstruction reports; street audit clutter counts.
Travel inconvenience for car-dependent disabled residents due to traffic filters.	Maintain and promote HAC01 Companion Permit digital applications and Taxicard vehicle exemption.	Parking & Enforcement / Mobility Team	Continuous	HAC01 permit uptake; PCN appeal resolution statistics.
Traffic displacement affecting bus speeds or queue lengths on boundary main roads.	Deploy real-time bus signal priority, expand 24/7 bus lanes, monitor junction queue lengths, and apply lane rental charges to roadworks.	Traffic & Transportation / TfL Partner Team	2026–2030	Bus Excess Waiting Time (EWT) ratios; average peak bus speeds; boundary junction queue length surveys.
Child road casualty risks in	Expand School Streets to all eligible	Road Safety & Active Travel	Annual Review to	KSI casualty statistics broken

Identified Risk / Impact	Mitigation Action Required	Lead Officer / Service	Target Timeline	Monitoring Metric
high-deprivation wards.	primary/secondary schools and deliver targeted active travel training.	Team	2035	down by ward and Index of Multiple Deprivation.
Exclusion of low-income groups from cycling due to purchase/storage costs.	Expand council-managed housing estate cycle hangars (with low-income discounts) and fund Community Bike Schemes / cargo bike grants.	Zero Emissions Network / Streetscene	2026–2028	Hangar space allocation on council housing estates; grant distribution.

7.2 Governance and Quality Assurance

In accordance with Hackney Council's EqIA Completion Guidance (2025/2026), this overarching assessment and all subsequent scheme-specific EqIAs are subject to rigorous governance controls:



- **Internal Peer Review:** Every scheme-level EqIA must be reviewed by the relevant Council team to ensure compliance with the *Brown Principles* (ensuring equality duties are exercised with rigour, substance, and an open mind prior to decisions).
- **Senior Sign-Off:** Approval is required from the relevant Head of Service and Assistant Director before submitting reports to Cabinet or delegated decision-makers.
- **Continuous Review & Evolving Mitigations:** Equality analysis does not terminate upon scheme approval. The Council uses statutory consultation periods, experimental traffic orders (ETOs), and live monitoring data (air quality, bus speeds, casualty counts, and disability permit feedback) to evaluate real-world impacts. Where monitoring demonstrates that existing mitigations are insufficient or that unforeseen disadvantages have emerged, mitigation measures and permit frameworks will evolve dynamically.

SECTION 8: Conclusion

This Equality Impact Assessment demonstrates that the *Hackney Transport Strategy 2026–2036* provides a robust framework for improving transport equity while supporting wider public health, safety and environmental objectives.

The assessment recognises that while the Strategy's focus on reducing motor traffic, protecting bus reliability, and enhancing walking and cycling offers substantial benefits for non-car-owning households, certain traffic management measures such as modal filtering or street space reallocation can influence journey routing and travel times. Because the nature of these operational changes varies depending on individual travel needs and local street layouts, particular consideration is given during local scheme design to the requirements of car-dependent disabled residents, households with complex care needs, and key movement corridors, ensuring that essential access and network reliability are thoroughly evaluated and supported through targeted mitigations.

To address these potential impacts, and to meet the requirements of Section 149 of the Equality Act 2010 and relevant highways legislation, the Council will take a three-part approach:

1. **Proportionate mitigation:** Providing targeted access arrangements, including the free HAC01 Companion Permit and digital Taxicard exemption, rather than broad resident exemptions. This provides necessary access for eligible users while supporting the objectives of traffic reduction, road safety and quieter residential streets.
2. **Procedural fairness:** Using the Strategy as an overarching framework, with individual schemes remaining subject to appropriate consultation, site-specific EqIAs and the Gunning Principles where applicable. This will ensure that local proposals are considered at a formative stage and that relevant evidence and representations are taken into account before decisions are made.
3. **Monitoring and review:** Monitoring real-world outcomes, including main road queue lengths, bus speeds, air quality, casualty rates and permit uptake. Where monitoring identifies unforeseen or disproportionate impacts, the Council will review and, where appropriate, adapt the relevant mitigation measures.

Overall, the Strategy provides a framework for balancing the benefits of safer, healthier and more sustainable transport with the potential for additional journey time

or routing impacts for some residents. These impacts have been identified and will be addressed through targeted mitigation, further assessment at scheme level, consultation and ongoing monitoring.