

Oxford Street Programme: Equality Impact Assessment (EqIA)



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1 Introduction

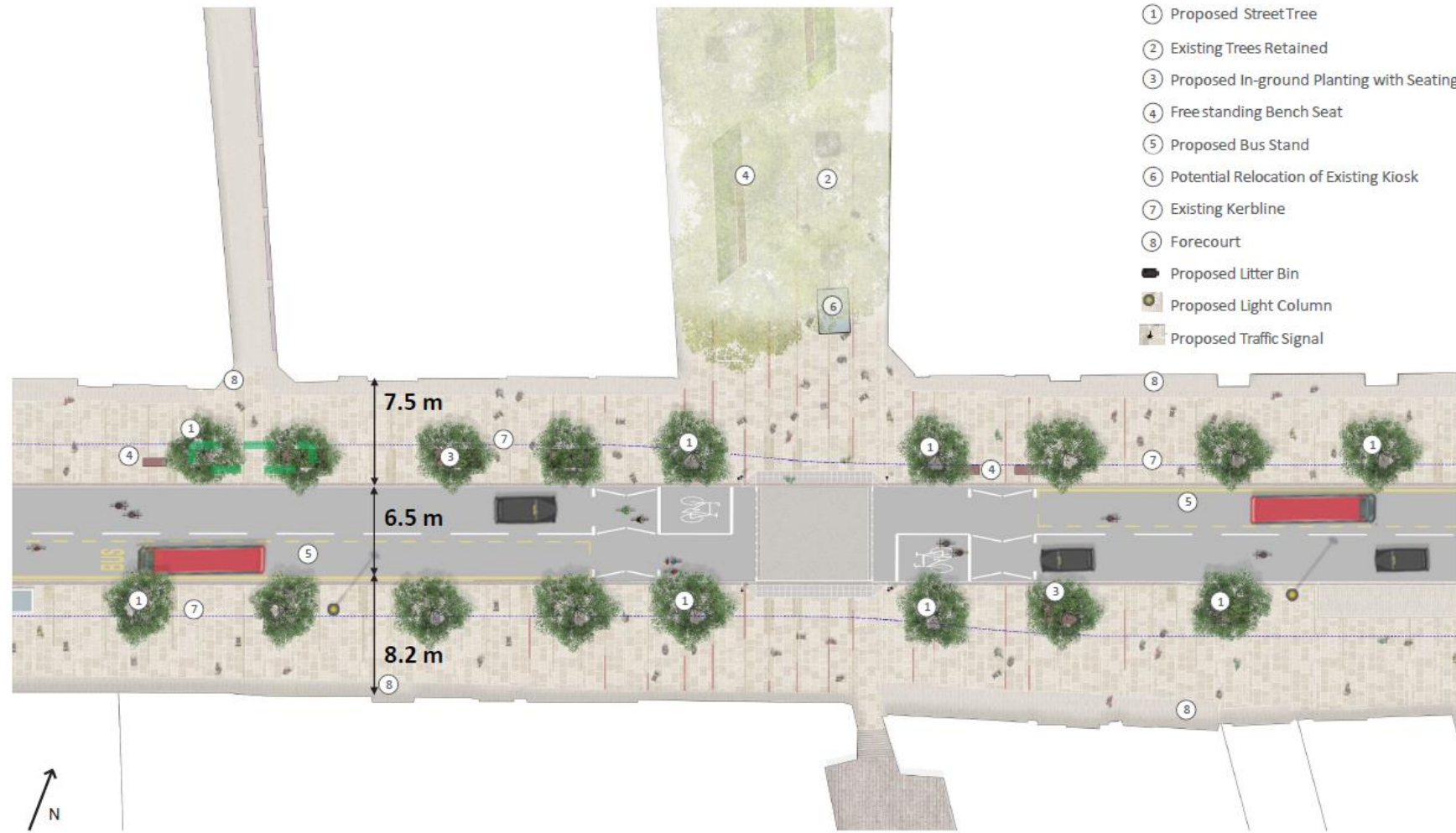
Background

- 1.1 This Equality Impact assessment (EqIA) relates to the proposed Oxford Street Programme, located within the City of Westminster. An EqIA is a process designed to ensure that a policy, project, or scheme does not unlawfully discriminate against any protected characteristic as defined by the Equality Act 2010. This EqIA has been produced by the independent transport and infrastructure consultancy, [Steer](#), on behalf of Westminster City Council (WCC).
- 1.2 This EqIA is a 'live' document. This iteration of the EqIA assesses the original scheme proposals and incorporates feedback received through public and targeted engagement. The EqIA will be updated following any design amendments to the scheme.

Scheme context

- 1.3 Public realm improvements, traffic management alterations and essential enabling works will be delivered across Oxford Street from its western terminus at Marble Arch to its eastern terminus at Tottenham Court Road, as well as on several side road which intersect with Oxford Street itself. The Oxford Street Programme will make the following improvements across the study area:
 - **Footways and junctions:** including widening footways, improving crossings and junctions and consolidating street clutter
 - **Placemaking:** improving the existing wayfinding, introducing new seating, and improving lighting and security
 - **Carriageways:** narrowing carriageway widths where possible, introducing raised tables and modal filters on some side streets to reduce the dominance of motor traffic
 - **Servicing:** consolidating and integrating new delivery and servicing facilities to minimise the impact this has on the public realm
 - **Green infrastructure:** introducing new street trees and other green infrastructure to provide shade and shelter
- 1.4 The visualisations overleaf present example plans of three sections of the proposals, at Great Titchfield Street, Old Cavendish Street and at Selfridges (400 Oxford Street). These present examples of the types and forms of interventions proposed across the programme. Full details of the scheme can be found on [WCC's website](#).

Example Area 1: Great Titchfield Street Proposed Plan



Proposed Plan

Example Area 2: Old Cavendish Street Proposed Plan



Proposed Plan

Example Area 3: Selfridges

Proposed Plan



Proposed Plan

Public consultation

- 1.5 The public consultation period for the Oxford Street Programme was open between July 17th – August 31st, 2023.
- 1.6 Feedback was requested on the programmes proposals via a web-based survey which included a combination of closed-and open-text questions. Awareness of the consultation was raised through a variety of measures including online marketing, leafleting, alongside a number of in-person drop-in sessions within Westminster.
- 1.7 Analysis was undertaken of the demographic characteristics of the survey respondents, as well as responses from people who share one or more protected characteristics covered under the Equality Act 2010. This insight is summarised within Table 1.1.

Table 1.1: Demographic Characteristics of Oxford Street Programme survey respondents

Protected characteristic covered under the Equality Act 2010	Demographic insight from respondents
Sex	<ul style="list-style-type: none"> • Male: 62.47% • Female: 34.11% • Transgender: 0.96% • Non-binary: 1.64%
Gender reassignment	<ul style="list-style-type: none"> • Gender identity is not different to the sex assumed to be at birth: 76.14% • Gender identity is different to the sex assumed to be at birth: 21.24%
Age	<ul style="list-style-type: none"> • Under 16: 0% • 16-24: 6.45% • 25-34: 23.73% • 35-44: 21.67% • 45-54: 17.01% • 55-64: 15.64% • 65-74: 10.15% • 75-84: 4.94% • 85+: 0.41%
Race	<ul style="list-style-type: none"> • English/Welsh/Scottish/Northern Irish/British: 58.32% • White other background: 23.93% • Indian: 2.89% • Irish: 2.48% • Other ethnic group: 12.48%
Disability	<ul style="list-style-type: none"> • Does not have a disability: 80.19% • Has a physical impairment (including frailty): 7.06% • Has a long-standing illness: 4.29% • Has a mental health condition (including dementia): 2.91% • Has a sensory impairment: 1.8% • Has a learning disability/difficulty: 1.25% • Has another disability condition: 2.5%
Sexual orientation	<ul style="list-style-type: none"> • Heterosexual or straight: 58.46% • Gay: 26.29%

	<ul style="list-style-type: none"> • Bisexual: 4.06% • Lesbian: 1.12% • Other sexual orientation: 2.8% • Prefer not to say: 7.27%
Marriage and civil partnership	<ul style="list-style-type: none"> • Never married and never registered a civil partnership: 51.15% • Married: 34.48% • Divorced: 5.46% • In a registered civil partnership: 3.88% • Widowed: 2.73% • Separated: 1.58%
Pregnancy and maternity	<ul style="list-style-type: none"> • Pregnant: 0.31% • Not pregnant: 40.37% • Have given birth within the past 26 weeks: 0.47% • Have not given birth within the past 26 weeks: 36.76%
Religion or belief	Insight on religion or belief was not collected

1.8 Analysis was undertaken on the open-text responses to the survey in order to identify specific insight regarding protected characteristics. The analysis is presented in Table 1.2.

Table 1.2: Oxford Street Programme protected characteristic key word insight

Protected Characteristic covered under the Equality Act 2010	Insight
Sex	No relevant key word insight.
Gender reassignment	No relevant key word insight.
Age	<ul style="list-style-type: none"> • Black cabs should be able to access as much of Oxford Street and its side streets as possible, as they are commonly used by older people. • Cycling infrastructure should be designed in a way that is good enough for use by children and older people. The current proposals do not provide sufficient cycling infrastructure to achieve this. • Lack of bus stop provision with specific gaps in provision (e.g. John Lewis to Primark) causing longer walks which can be particularly hard for some older people. • The proposals need to consider those who rely on private cars to go shopping – such as older people. • Changes to bus stop provision – particularly near Oxford Circus – will impact older people as it will result in a longer walk to interchange between the Underground and bus services. • More trees/flowerbeds benches and playgrounds will make the area more child friendly. • Existing feeling that using Oxford Street is currently unpleasant with children or young families due to its busy and chaotic nature. If the proposed changes bring calm the area, then it'll be beneficial.
Race	No relevant key word insight.

Disability	<ul style="list-style-type: none"> • Black cabs should be able to access as much of Oxford Street and its side streets as possible, as they are commonly used as an essential mobility aid by some disabled people. • Lack of bus stop provision with specific gaps in provision (e.g. John Lewis to Primark) causing longer walks which can be difficult for some disabled people. • The proposals need to consider those who rely on private cars to go shopping – such as many disabled people. • Changes to bus stop provision – particularly near Oxford Circus – will impact some disabled people as it will result in a longer walk to interchange between the Underground and bus services. • Congestion impacts on surrounding roads may impact some disabled people, particularly people who live with asthma or other breathing difficulties, as this may worsen air quality. • The location and design of tactile paving should be carefully considered across the public realm. • Where cycle speed calming is used, it should be designed in a way that it does not unduly impact those using mobility aids (e.g., mobility scooters), and non-standard bicycles. • The way in which dockless cycle/scooter hire is managed across the area should be considered in detail, to reduce the impact of poorly parked vehicles on the footways and creating additional street clutter. • Benches and seating are vital for disabled people who need or want to sit and rest as part of their onward journey. • Removal of taxi ranks on Oxford Street will impact access, which could have an acute impact on some disabled people who use them as essential mobility aids.
Sexual orientation	No relevant key word insight.
Marriage and civil partnership	No relevant key word insight.
Pregnancy and maternity	<ul style="list-style-type: none"> • Lack of bus stop provision with specific gaps in provision (e.g. John Lewis to Primark) causing longer walks for those with children and buggies.
Religion or belief	No relevant key word insight.

1.9 Table 1.2 concludes that survey respondents focussed mainly on impacts relating to older people and disabled people. Respondents were focussed mainly on the perceived impact of the scheme on surrounding roads, notably congestion and consequential air quality impacts, alongside how the proposals may impact access by those using private vehicles, taxis, or buses.

Stakeholder engagement

1.10 In addition to this public engagement, Steer also held meetings with representatives of Age UK (Royal Borough of Kensington and Chelsea branch), Mosaic LGBT+ Young Persons' Trust, Open Age and The Guide Dogs for the Blind Association to capture their thoughts and ideas for the Programme. Separately, in early November 2023, the WCC project team hosted a drop-in event specifically for disabled people to share their insights and discuss solutions around the proposed design and materials.

- 1.11 Feedback from these conversations has been used to directly inform the impacts and recommended mitigation measures outlined within this EqIA.

Assumed impact on transport and movement

- 1.12 The impacts identified throughout this EqIA are derived from the assumption that the proposed scheme will have the following impacts on transport and movement in the area:
- The additional 6,100sqm of footway, as well as new footway surfacing along Oxford Street will provide people with additional comfort when making trips on foot, particularly at peak hours when pedestrian volumes are at their highest and footways at their busiest.
 - The introduction of 12 new pedestrian crossings and 5 new 'all green' stages for pedestrians will make it quicker and more convenient to cross Oxford Street, reducing the time that pedestrians have to wait, and limiting the distances that people are required to walk to reach a crossing point. Furthermore, the reduction in carriageway widths will reduce the distances required to cross the road.
 - The new bidirectional cycleway crossing between James Street and Gilbert Street, crossing Oxford Street, will also make it easier and safer to cross Oxford Street for people cycling.
 - A number of additional trees will be planted, alongside new planting and greenery. The trees will provide shade and shelter from inclement weather and improve localised air quality. Greenery and planting will further assist with collecting rainwater, limiting the amount of standing water on the footway and carriageway.
 - New public seating areas will provide places for people to sit and rest as they visit or pass through the area, while the reduced clutter of street furniture will maximise the usable space of footways.
 - Changes to motor vehicle access on some of the side roads which intersect with Oxford Street may make some journeys longer as drivers are required to take alternative routes. This could have an impact on some protected characteristics who are more sensitive to changes in journey times.
 - Alterations made to the operation of buses throughout Oxford Street and the surrounding network will likely improve bus journey times.
 - The increased size of some existing taxi ranks, as well as the addition of new ranks will likely improve the accessibility to the area for people who rely on taxis as an essential form of mobility.
 - Removing and relocating some Blue Badge bays may have an impact on the accessibility of the street to some Blue Badge holders
 - Surface level loading bays will likely be used by heavy delivery and servicing vehicles which could potentially damage surfaces and create trip hazards for those crossing them.

2 Scoping

- 2.1 A scoping assessment has been undertaken to identify whether the proposed scheme could have a disproportionate impact on people with one or more protected characteristics.
- 2.2 “Disproportionate impact” means that groups of people who share a protected characteristic may be significantly more affected by a change than other people.
- 2.3 Protected characteristics are defined by the Equality Act 2010. The 'protection' refers to protection from discrimination. There are nine characteristics protected by the Equality Act:
- Age
 - Disability
 - Gender reassignment
 - Marriage and civil partnership
 - Pregnancy and maternity
 - Race
 - Religion or belief
 - Sex
 - Sexual orientation
- 2.4 As the Oxford Street Programme is aimed at making the streets on and around Oxford Street more attractive to people walking and dwelling, as well as making them safer and less polluted, it is considered that the scheme is likely to impact people’s movement and experience of streets and spaces. Protected characteristics that have a significant intersection with movement and space, i.e., those that travel in distinguishably different ways, are most likely to be affected.
- 2.5 It is not considered that the ‘marriage and civil partnership’ or ‘religion and belief’ protected characteristics have a significant intersection with movement and space. As such, they have not been included in the baseline data or the detailed analysis of equality impacts that follows.
- 2.6 This exercise considers both potential positive and negative impacts, and, where possible, provides evidence to explain how and why a group might be particularly affected. Table 2.1 provides a summary of the scoping assessment.

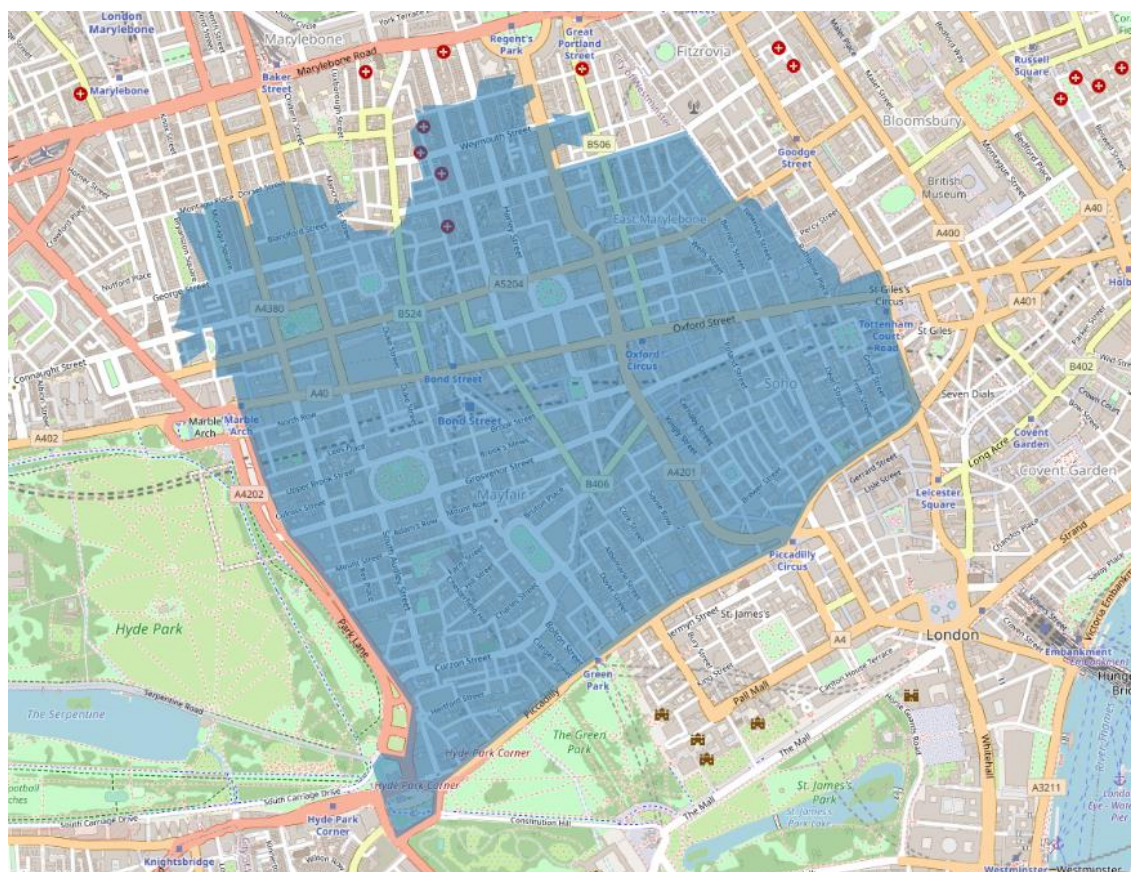
Table 2.1: Protected characteristics scoping

Protected characteristic	Disproportionate impact unlikely	Disproportionate impact possible	Commentary
Age – people in particular age groups (particularly over 65s and under 16s)		✓	There could be a disproportionate impact which this EqIA will investigate. A person's ability to use the transport network can be reduced as a result of age and age-related health conditions.
Disability – people who have physical, sensory, intellectual, or mental health impairment(s)		✓	There is likely to be a disproportionate impact which this EqIA will investigate. A person's use of the transport network can be shaped by certain disabilities.
Gender reassignment – people who are intending to undergo, are undergoing, or have undergone a process or part of a process of gender reassignment		✓	There is likely to be a disproportionate impact which this EqIA will investigate. People who have undergone gender reassignment can experience streets differently to others.
Marriage and civil partnership – people who are married or in a civil partnership	✓		People who are married or in a civil partnership are unlikely to be disproportionately impacted by the scheme.
Pregnancy and maternity – people who are pregnant or have given birth in the previous 26 weeks		✓	There could be a disproportionate impact which this EqIA will investigate. A person's use of the transport network can be shaped by pregnancy and parental care.
Race – people of a particular race or ethnicity (including refugees, asylum seekers, migrants, gypsies and travellers)		✓	There could be a disproportionate impact which this EqIA will investigate. Use of the transport network and/or occupation may differ depending on ethnic group.
Religion or belief – people of particular faiths and beliefs	✓		People who share a particular religion or belief are unlikely to be disproportionately impacted by the scheme.
Sex – whether people are male or female		✓	There could be a disproportionate effect which this EqIA will investigate. Use of the transport network and/or occupation may differ depending on sex.
Sexual orientation – whether a person's sexual orientation is towards the same sex, a different sex, or both.		✓	There could be a disproportionate impact which this EqIA will investigate. A person's use of the transport network and the streets can be shaped by their sexuality.

3 Data Sources

- 3.1 For this assessment, information has been gathered about protected characteristics for the Westminster 011A, Westminster 011B, Westminster 011E, Westminster 012A, Westminster 013B, Westminster 013D, Westminster 013G, and Westminster 018D Lower Layer Super Output Areas (LSOAs), Borough-wide data for the City of Westminster, and data for London as a whole. The relevant LSOAs are represented below in Figure 3.1. Throughout this EqIA, this is referred to as the 'study area'.
- 3.2 The City of Westminster is a small and densely populated central area with high levels of walkability and public transport provision. The area also has a very high density of tourist attractions and other points of interest. This means that any given street is likely to be used by people from across a wider area, including visitors from outside London.
- 3.3 Therefore, it is important to consider a range of areas beyond the immediate surroundings of the scheme. This requirement is satisfied with the use of LSOA data in combination with City of Westminster and London-wide data, whilst acknowledging the likely presence of outside visitors.
- 3.4 London as a whole is also included in the assessment to provide greater context to the data for residents living in the City of Westminster.

Figure 3.1: City of Westminster LSOAs



Source: Nomis, 2023

Data sources and limitations

- 3.5 The London Travel Demand Survey (LTDS)¹ and Census 2021 are the two primary data sources used throughout this assessment. Supplementary data sources have also been used and are referenced throughout. Data has been collated and analysed for each in-scope protected characteristic, with comparisons made at LSOA, City of Westminster and London as a whole levels where relevant.
- 3.6 Census data is a useful tool for understanding and comparing travel characteristics of one area with another; however, it does have limitations – particularly that 2021 Census data is thought to have been influenced by alterations to ways of living and moving during the Covid-19 pandemic.
- 3.7 The granularity of LTDS data captures City of Westminster and London as a whole levels but not LSOA level. It is calculated using sample sets and subsequently scaled up. Throughout this report, acknowledgement has been made where the sample size of LTDS data is particularly small. Available LTDS data is currently from before the Covid-19 pandemic, and subsequent alterations to ways of living and moving are therefore not represented.

¹ Averaging results across the 2017/18, 2018/19 and 2019/20 surveys.

4 Baseline Evidence

Population

4.1 The usual residential population of the study area is 47,206 according to the 2021 census.

4.2 The population is split across the LSOAs as follows:

- Westminster 013B - 6,867
- Westminster 013G - 3,527
- Westminster 013D - 6,968
- Westminster 011B - 4,909
- Westminster 011E - 5,283
- Westminster 012A - 9,775
- Westminster 011A - 7,562
- Westminster 018D - 2,316

Workforce

4.3 The City of Westminster has a very large workforce in comparison to its usual residential population. The 2023 WCC Joint Strategic Needs Assessment (JSNA) recorded the residential population as 205,100 people, and WCC data shows that there are 767,000 jobs in the City of Westminster as of May 2023 – almost 4 times the usual residential population which demonstrates significant movement in and out of the City every day. In addition, WCC estimates there are 434,000 tourist trips in the City of Westminster every day, again as of 2023.

4.4 The workday population, i.e., all people who are either in employment in the area, or not in employment but live there, was 206,255 in the study area according to the 2011 Census². This is compared to a usual resident population of 47,206 in the study area according to the 2021 Census. Again, this suggests that the area is crowded during the day and experiences significant movement down to a granular level.

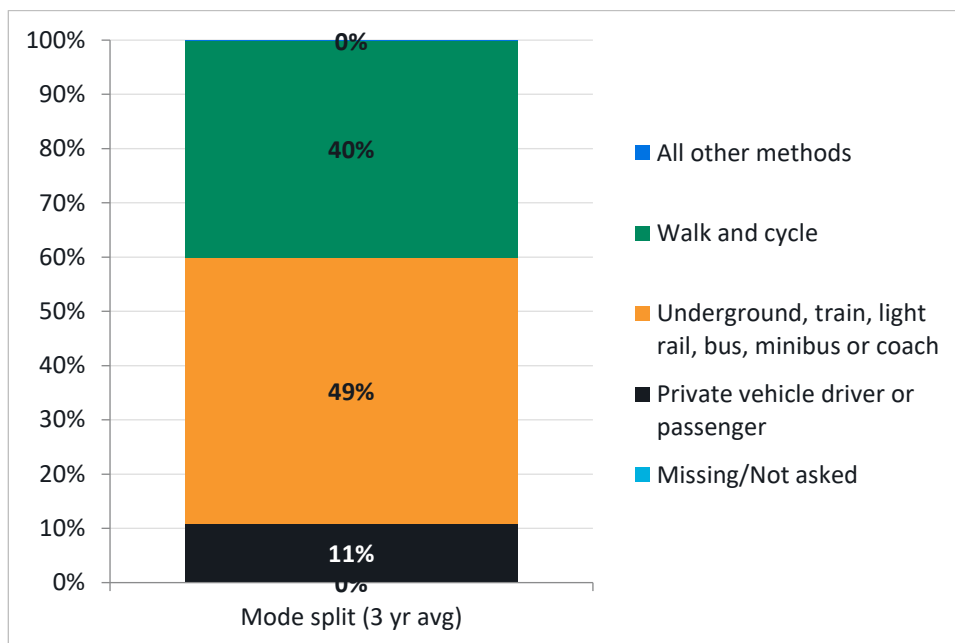
4.5 When compared to London as a whole, the City of Westminster has a higher proportion of professional occupations, including professional, scientific, and technical industries, public administration and defence, information and communication and financial services, as well as accommodation and food services.

4.6 LTDS data shows that, overall, 61 per cent of those travelling to Westminster use public transport, 30 per cent walk and cycle and only 9 per cent use private car, as shown in Figure

² Used in this one instance (with the same LSOAs, except for Westminster 013G which in 2011 was made up of the Westminster 013E and Westminster 013F LSOAs) as the data is not yet available to this geography in the 2021 Census.

4.1. These changes may not reflect changes brought about by the Covid-19 pandemic and its effects, however.

Figure 4.1: Method of travel to work for those with a workplace in the City of Westminster



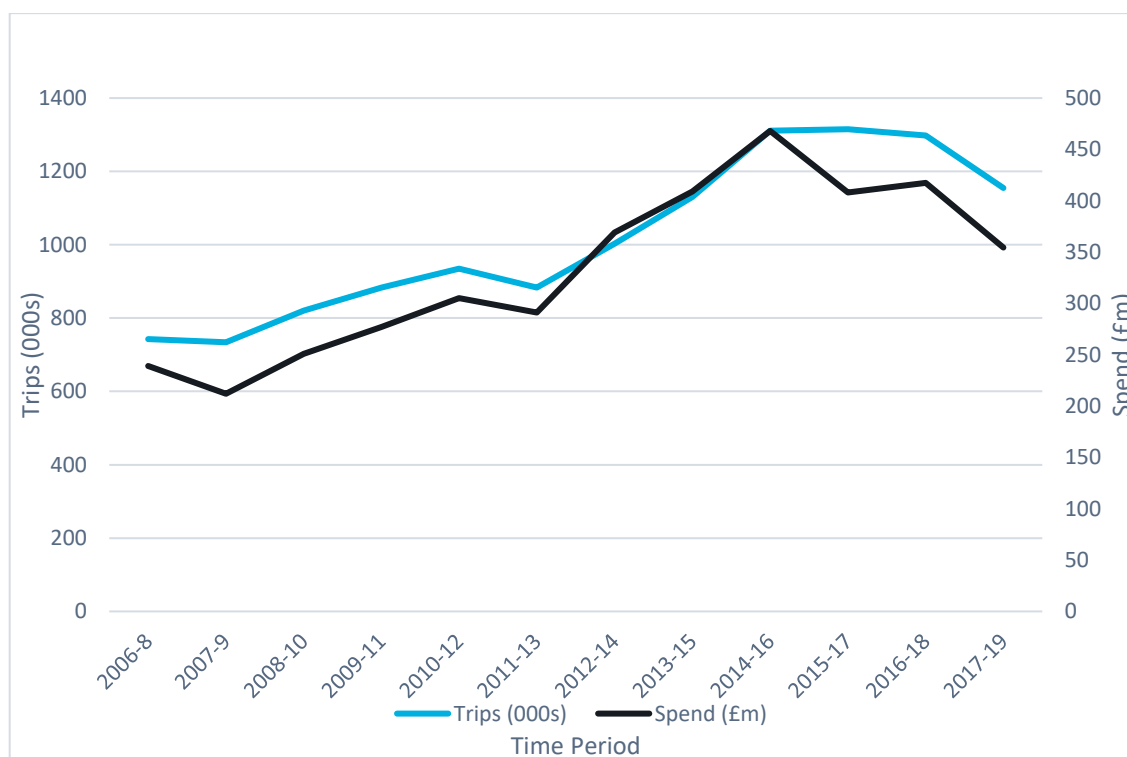
Source: LTDS average (2017/18, 2018/19, 2019/20)

Visitors

- 4.7 The City of Westminster hosts multiple major attractions, including Oxford Street. A 3-year average between 2016 and 2019 estimated a total of 1.15 million yearly visitors to Westminster. This is accompanied by a spend of £354 million in Westminster in the same period³.
- 4.8 The trend in visitor trips and spend in Westminster is shown in Figure 4.2 below.

³ Visitbritain.org - https://www.visitbritain.org/sites/default/files/vb-corporate/local_authorities_spreadsheet_2019.xlsx

Figure 4.2: Visitor trips and spend in Westminster



Source: City of Westminster Tourism and Travel 2020

- 4.9 Oxford Street itself brings in high visitor numbers, with BNP Paribas finding it to be the 2nd busiest pedestrian street in Europe in 2021. The study day recorded 72,700 visitors to Oxford Street, almost 16,000 higher than the next busiest in London.⁴

Age

Definition according to the Equality Act 2010

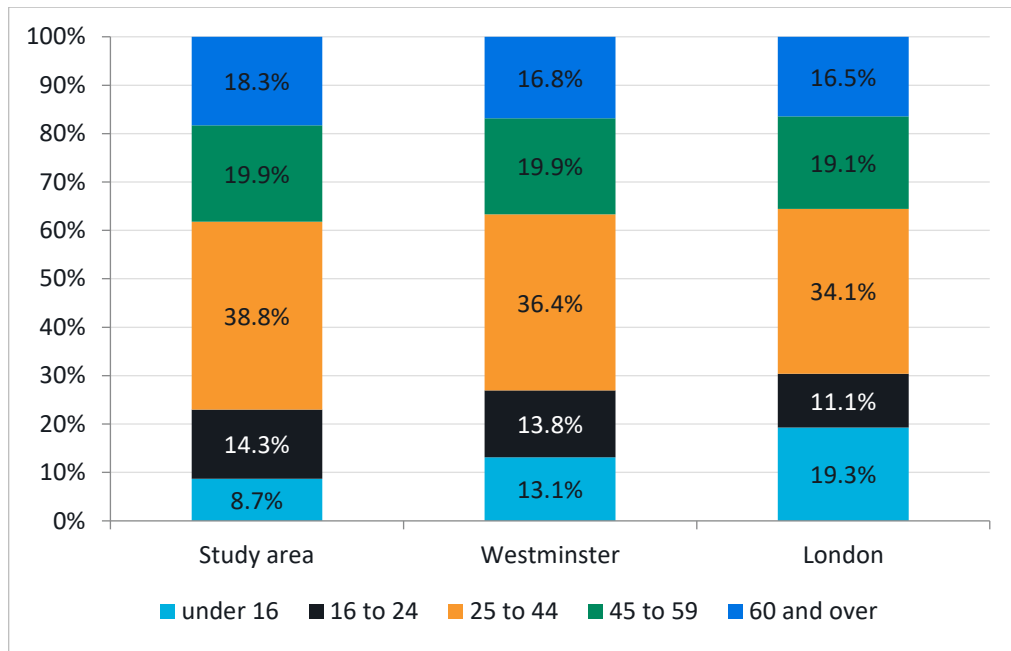
1. In relation to the protected characteristic of age:
 - a. A reference to a person of a particular age group
 - b. A reference to persons who share a protected characteristic is a reference to persons of the same age group
2. A reference to an age group is a reference to a group of persons defined by a reference to age, whether by reference to a particular age or to a range of ages.

Baseline equalities data

- 4.10 As of 2021, the greatest proportion of residents in the study area were in the 25-44 age group (39 per cent) (Figure 4.3). This was higher than both the City of Westminster (36 per cent) and London as a whole (34 per cent). The under 16 population in the study area was markedly lower than that of Westminster and London as a whole, however the number of over 60s was slightly higher in the study area (18 per cent) than in Westminster (17 per cent).

⁴ [BNP Paribas' Pan-European Footfall Report](#).

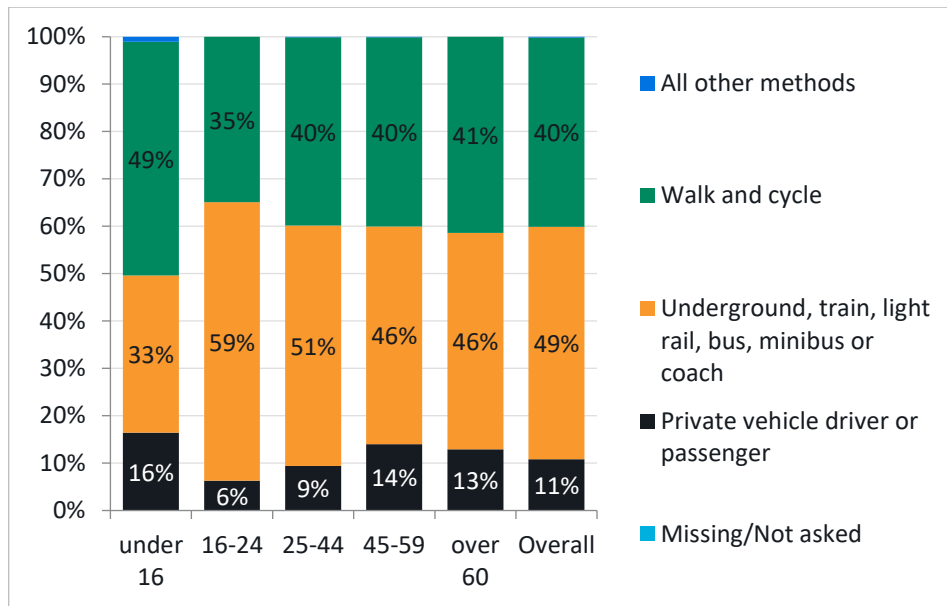
Figure 4.3: Age distribution in the study area, compared to City of Westminster and London as a whole



Source: Census 2021

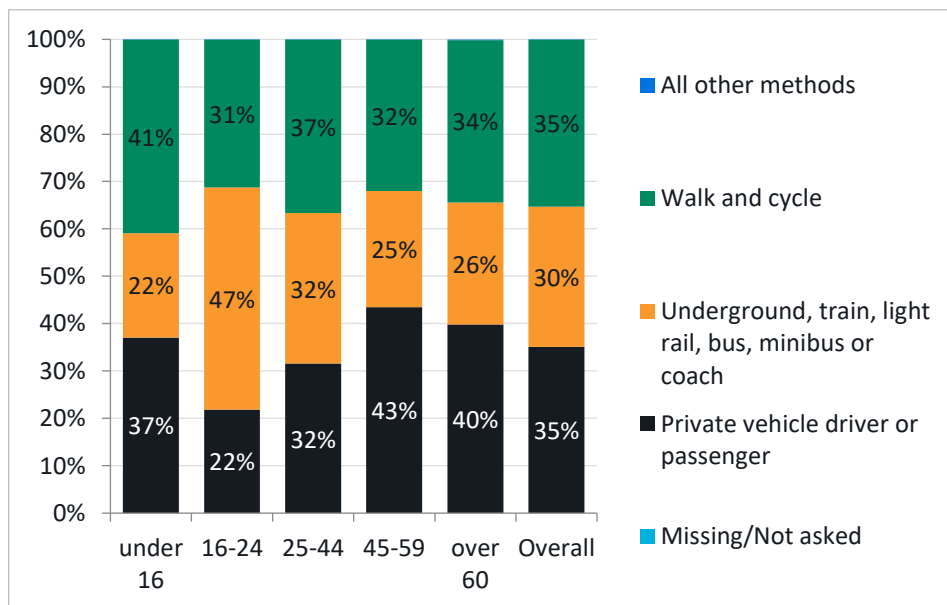
- 4.11 Figure 4.4 presents LTDS data on how people travel around the City within each age group, and Figure 4.5 presents this same information for London as a whole.
- 4.12 In Westminster, the highest usage of active travel modes (walking and cycling) is among those aged under 16 (49 per cent), followed by those aged over 60 (41 per cent). On the other hand, only 35 per cent of those aged 16-24 walk or cycle.
- 4.13 The highest usage of public transport modes (underground, train, light rail, bus, minibus, or coach) is among those aged 16-24 (59 per cent), followed by those aged 25-44 (51 per cent). On the other hand, only 33 per cent of those aged under 16 use public transport.
- 4.14 The pattern for Greater London is similar to Westminster in terms of which age group uses active travel modes the most - 41 per cent of those aged under 16 walk or cycle. The pattern for Greater London is also similar in terms of which age group uses public transport the most - 47 per cent of those aged 16-24 use public transport. However, in Westminster using active travel modes and particularly public transport is even more important.

Figure 4.4: Mode share by age in the City of Westminster



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

Figure 4.5: Mode share by age in London as a whole

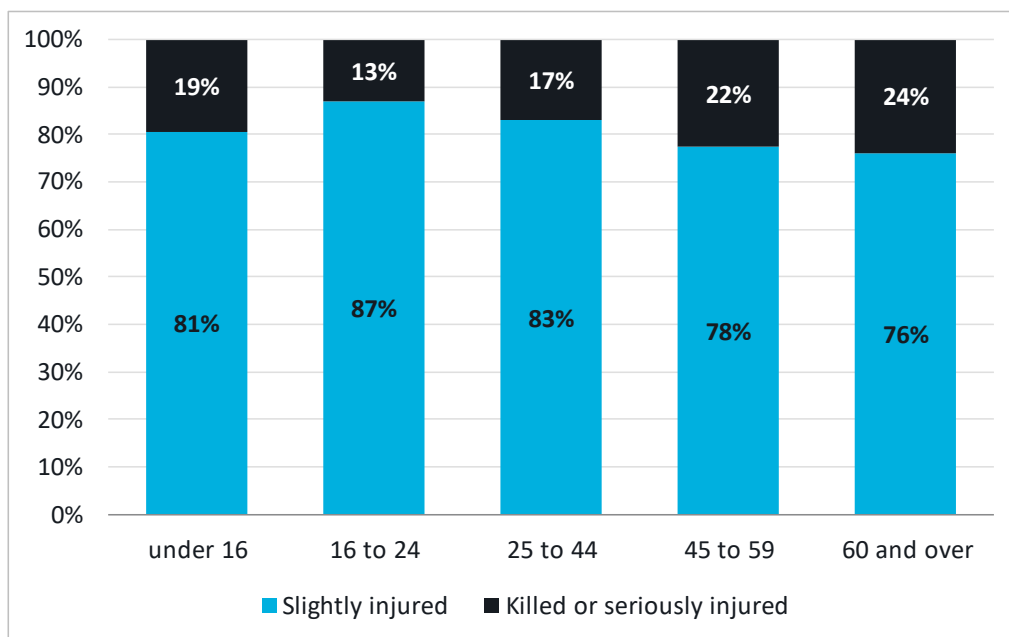


Source: LTDS average (2017/18, 2018/19, 2019/20)

4.15 Killed and Seriously Injured (KSIs) and Slightly Injured casualties by age category are shown in Figure 4.6 below. In total there were 223 KSIs and 1,240 total casualties in the City of Westminster in 2021. Recorded KSIs as a proportion of total casualties are highest for the 60 and over age group (24 per cent) and the 45-59 age group (22 per cent). This indicates that these age groups are disproportionately likely to suffer severe consequences if they are a casualty in a collision.

4.16 Across the UK, 10-14 age group road accidents make up over 50 per cent of all external causes of death. Moreover, 15–19-year-olds experience almost double the risk of death from road traffic accidents (82.5 deaths per million population) in comparison to the general population.

Figure 4.6: Percentage Killed or Seriously Injured by age in the City of Westminster



Source: STATS19, 2021

Disability

Definition according to the Equality Act 2010

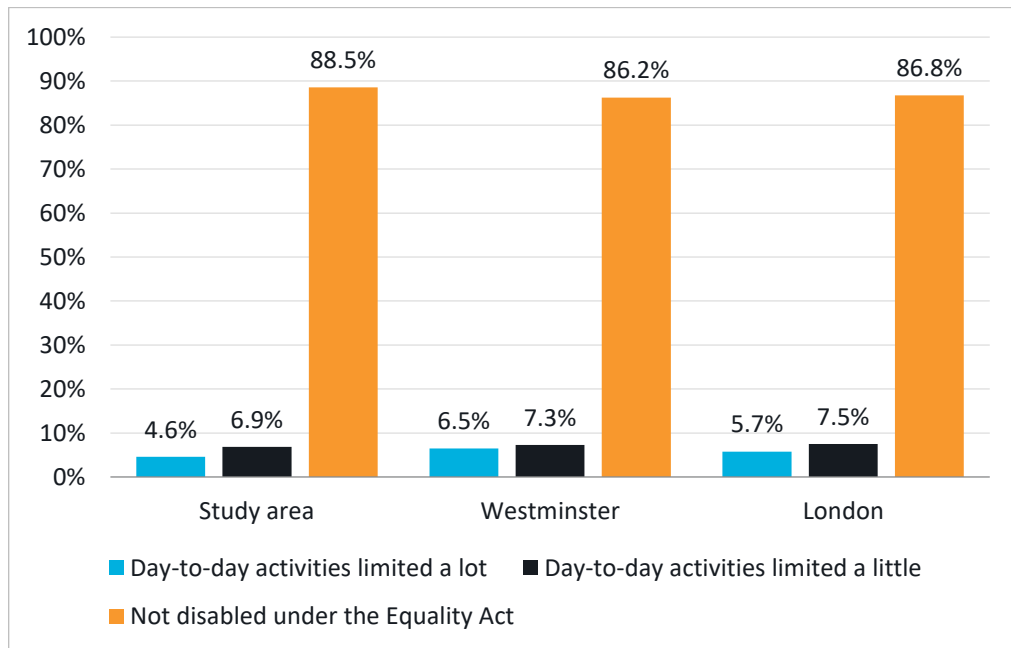
1. A person (P) has a disability if:
 - a. P has a physical or mental impairment, and
 - b. the impairment has a substantial and long-term adverse effect on P’s ability to carry out normal day-to-day activities.

Baseline equalities data

4.17 In the study area, Census 2021 data shows that 89 per cent of residents feel that they have no physical or mental impairments affective their daily activities (Figure 4.7). This is notably higher than both in Westminster (86 per cent) and London as a whole (87 per cent).

4.18 The number of residents in the study area for whom daily activities are ‘limited a lot’ account for 5 per cent of the population, compared to 6 per cent for London as a whole. A further 7 per cent of residents in the study area said they were ‘limited a little’, compared to 8 per cent for London as a whole.

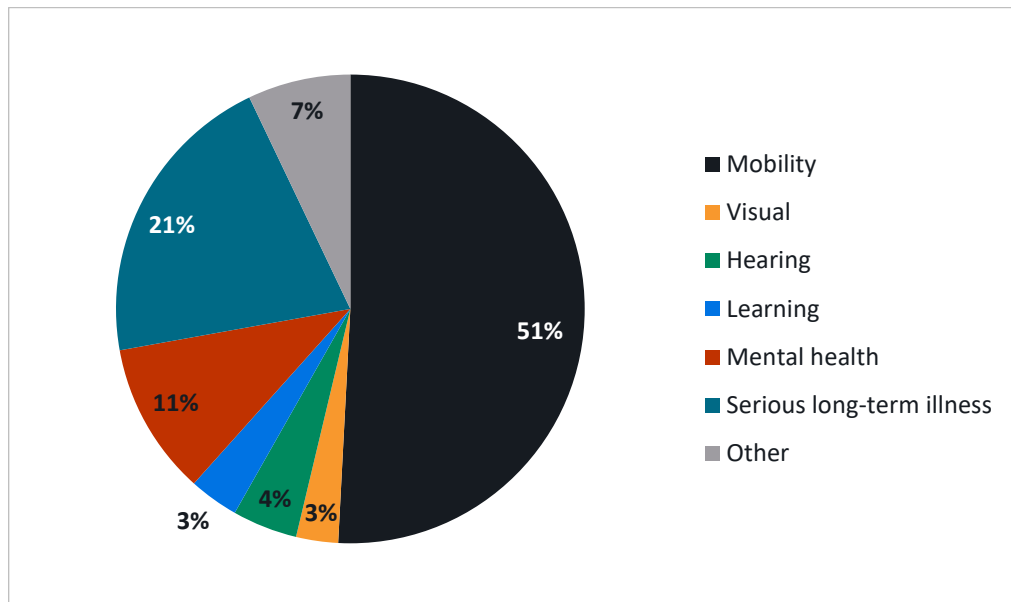
Figure 4.7: Population limited by long-term health problems or disabilities in the study area, City of Westminster and London as a whole



Source: Census 2021

4.19 Impairment types stated by those who live in Westminster which affect daily travel are shown in Figure 4.8. Mobility impairment represents the highest proportion (51 per cent), followed by serious long-term illness (21 per cent). It should be noted that this data is based on a small sample; therefore, results should be taken as a general indication only. In Greater London, mobility impairment also represents the highest proportion (57 per cent).

Figure 4.8: Impairment types stated by those with an impairment affecting travel in the City of Westminster



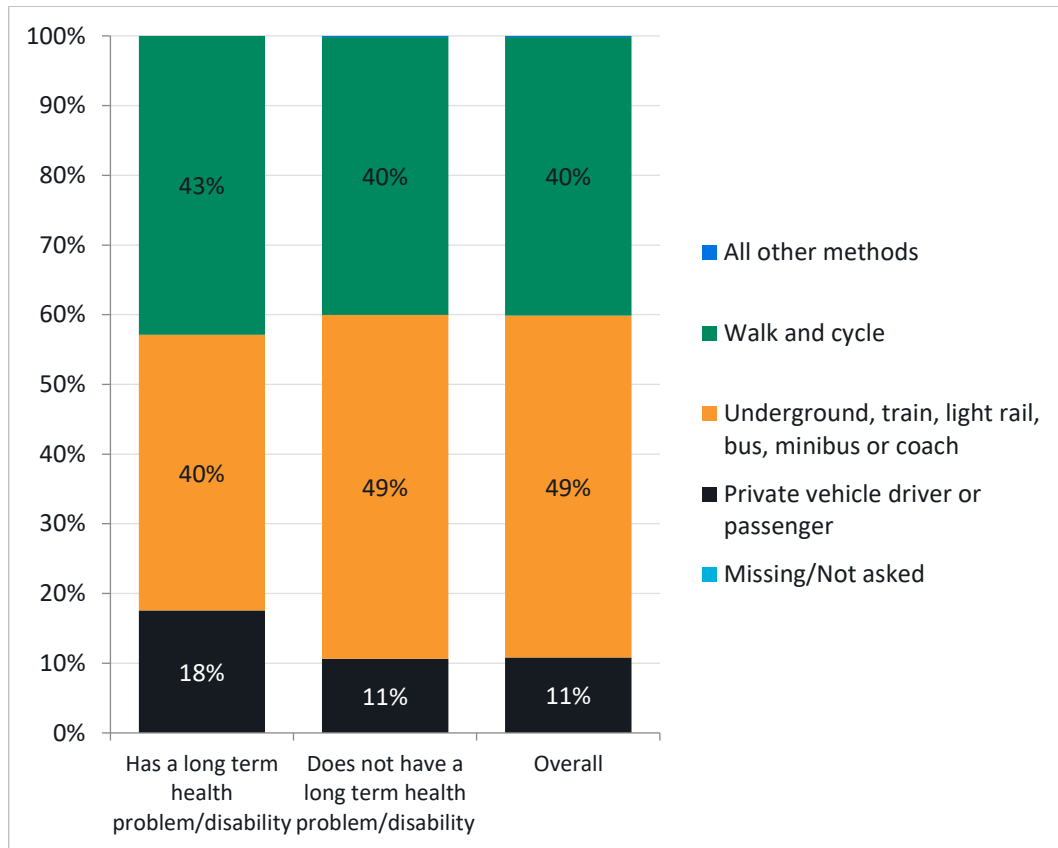
Source: LTDS average (2017/18, 2018/19, 2019/20)

4.20 The mode share for people with a long-term health problem or disability in the City of Westminster and London as a whole is shown in Figure 4.9 and Figure 4.10 respectively.

4.21 In Westminster, people without a long-term health problem or disability are more likely to use public transport (49 per cent vs 40 per cent), more likely to use private vehicles (18 per cent vs 11 per cent), and more likely to walk or cycle (43 per cent vs 40 per cent) than people with a long-term health problem or disability.

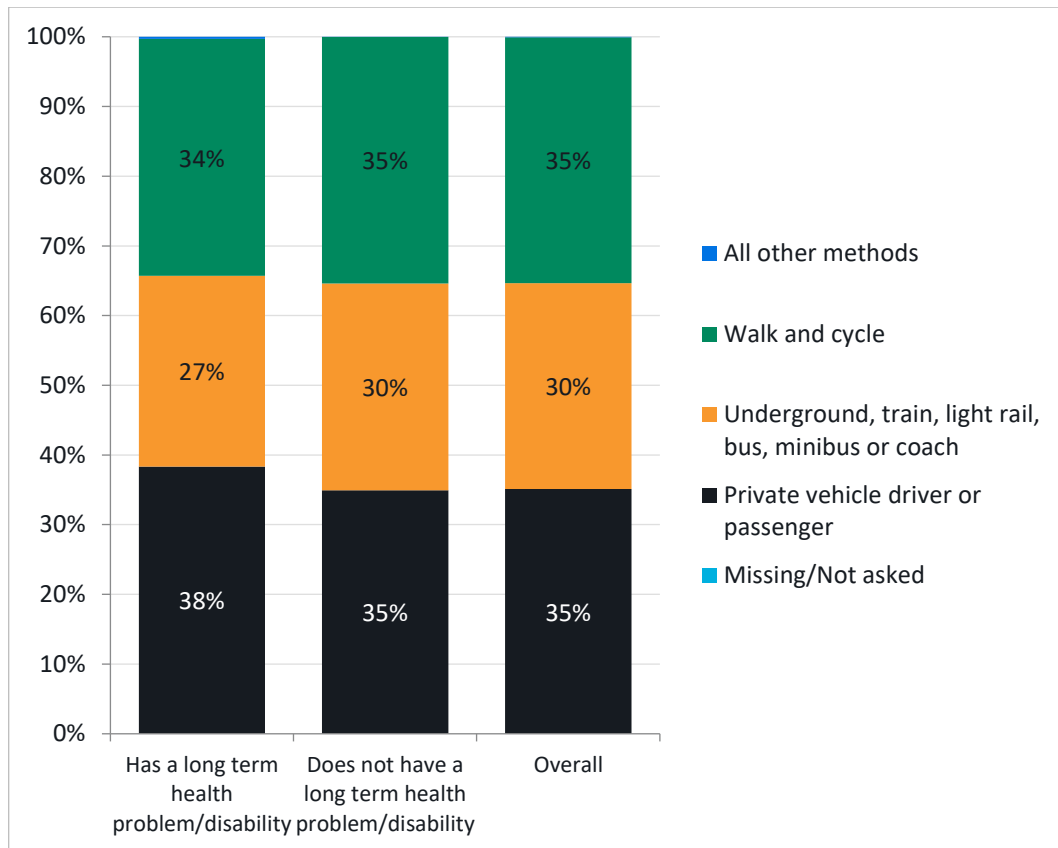
4.22 For Greater London, the modal split is very similar for people with and without long-term health problems or disabilities. The data for Greater London shows that those with a long-term health problem or disability are less likely to use public transport than those without a long-term health problem or disability (27 per cent vs 30 per cent).

Figure 4.9: Mode share of those with a long-term health problem or disability in City of Westminster



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

Figure 4.10: Mode share of those with a long-term health problem or disability in London as a whole

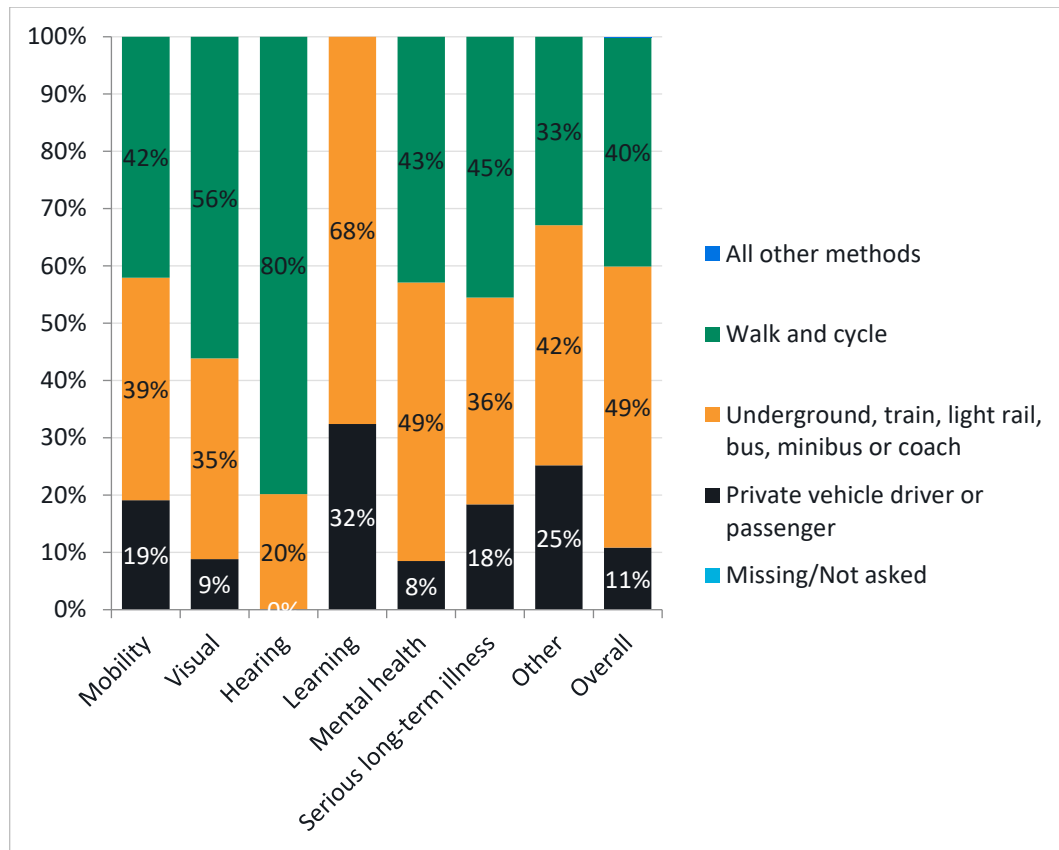


Source: LTDS average (2017/18, 2018/19, 2019/20)

4.23 The mode share for people with specific impairments in City of Westminster and London as a whole is shown in Figure 4.11 and Figure 4.12 respectively. Public transport is the dominant mode of travel for people with learning impairments, mental health impairments and ‘other’ impairments; however, this must be taken into the context of the small sample size that this data is derived from. The modal split for individuals with mobility impairments is more even, with only 39 per cent using public transport, 19 per cent using cars/vans, and 42 per cent undertaking active travel.

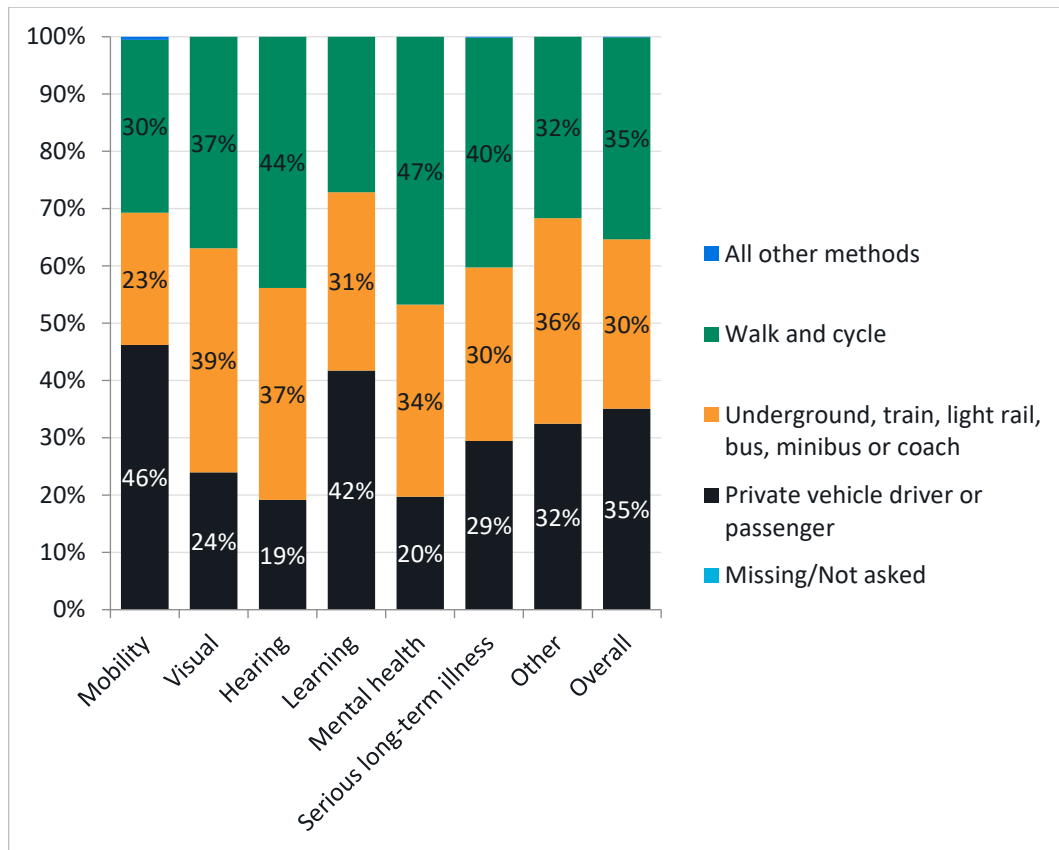
4.24 Compared to Westminster, mode share across impairment types for London as a whole shows a much greater uptake of active travel and private vehicle use, along with lower public transport mode share. Groups with mobility (46 per cent) and learning (42 per cent) impairments are most likely to use private vehicles, while those with mental health impairments are most likely to undertake active travel (47 per cent).

Figure 4.11: Mode share of those with a specific impairment affecting daily travel in City of Westminster



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

Figure 4.12: Mode split by those with a specific impairment affecting daily travel in London as a whole



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

- 4.25 Focusing on disabled cyclists, the Wheels for Wellbeing annual survey (2019/20)⁵ showed that 65 per cent of disabled cyclists use their cycle as a mobility aid, and 64 per cent found cycling easier than walking. Survey results also show that 31 per cent of disabled cyclists’ cycle for work or to commute to work and many found that cycling improves their mental and physical health.
- 4.26 Inaccessible cycle infrastructure was found to be the biggest barrier to cycling, followed by the prohibitive cost of adaptive cycles and the absence of legal recognition of the fact that cycles are mobility aids on par with wheelchairs and mobility scooters. These results are presented on a national level, yet it should be noted that the data is based on a small sample and results should be taken as an indication only.

Pregnancy and maternity

Definition according to the Equality Act 2010

- 4.27 As per the Equality Act 2010, pregnancy is the condition of being pregnant or expecting a baby, and maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth.

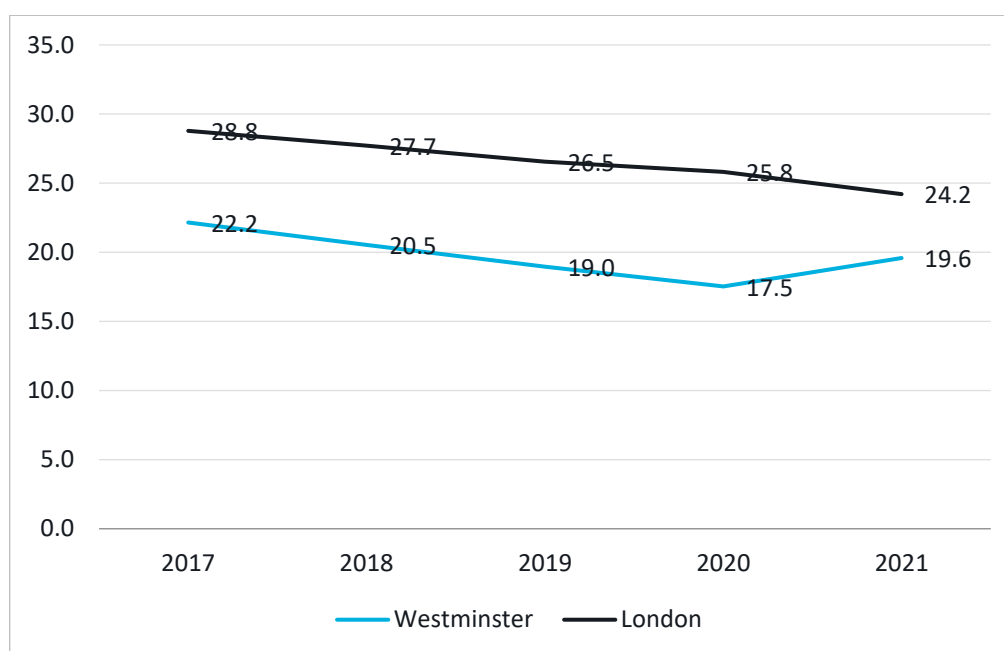
⁵ <https://wheelsforwellbeing.org.uk/wp-content/uploads/2020/07/WFWB-Annual-Survey-Report-2019-FINAL.pdf>

Baseline equalities data

4.28 In 2021, the General Fertility Rate (GFR)⁶ in the City of Westminster was 19.6, while the GFR for London was 24.2. This suggests that fewer women were likely to be pregnant or have given birth in 2021 in the City of Westminster compared to the London as a whole average.

4.29 Figure 4.13 shows that, overall, the number of live births has been gradually falling in both City of Westminster and in London as a whole. During this time, the GFR for City of Westminster remained consistently below the London as a whole average. In 2018, there was a slight uptick in the fertility rate in the City of Westminster (before continuing to fall) yet it remained well below the London as a whole rate.

Figure 4.13: General Fertility Rate per year in City of Westminster compared to the London as a whole average



Source: ONS, 2022

Race

Definition according to the Equality Act 2010

Race includes:

- a. colour;
- b. nationality;
- c. ethnic or national origins.

In relation to the protected characteristic of race –

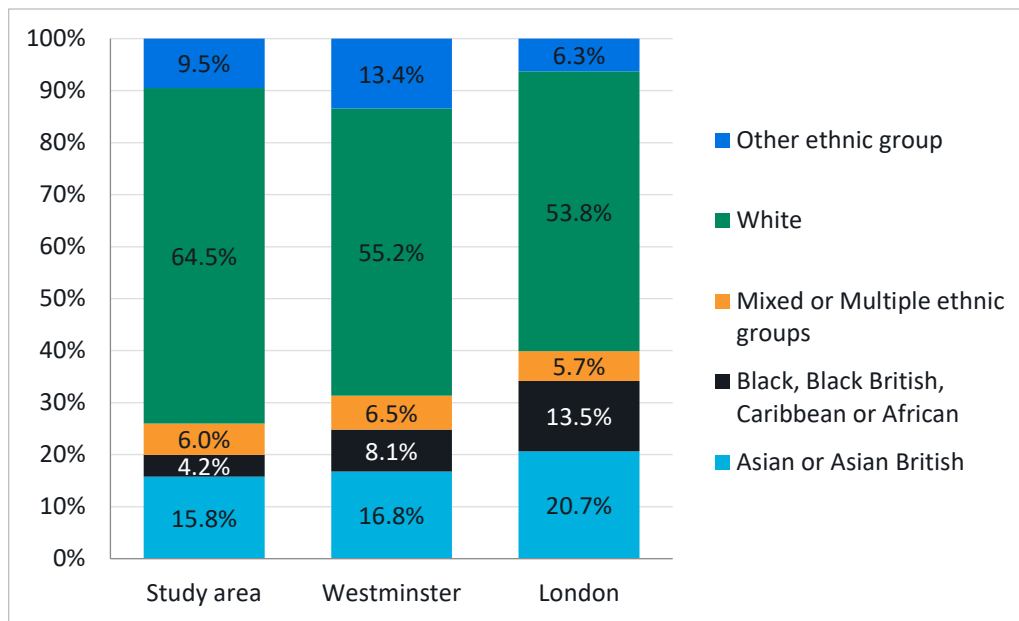
- a. a reference to a person who has a particular protected characteristic is a reference to
- b. a person of a particular racial group;
- c. a reference to persons who share a protected characteristic is a reference to persons of the same racial group.

⁶ Births per 1,000 women aged 15-44.

Baseline equalities data

- 4.30 Figure 4.14 presents the population of the Study Area and Westminster by ethnicity. Based on Census 2021 data, 55 per cent of the City of Westminster’s population is ‘White’, making it the most common ethnicity. This is similar to the Greater London average (54 per cent) and lower than the Study Area (65 per cent). The second most common ethnicity is ‘Asian’, making up 17 per cent and 16 per cent of the residential population in Westminster and Study Area respectively.
- 4.31 In the Study Area, 4 per cent of the population are ‘Black’, lower than in the City (8 per cent) but less than in London as a whole (14 per cent). The share of residents that identify as ‘Mixed’ is similar across the Study Area (6 per cent), Westminster (7 per cent) and Greater London (6 per cent).

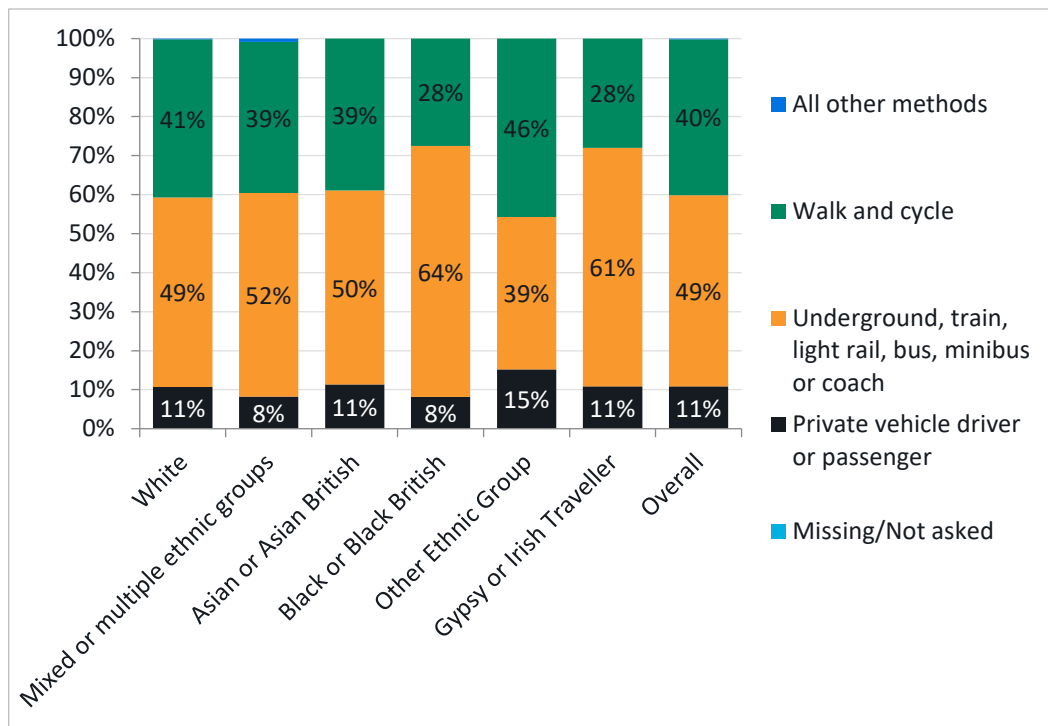
Figure 4.14: Study Area and Westminster ethnicity compared to London average



Source: Census 2021

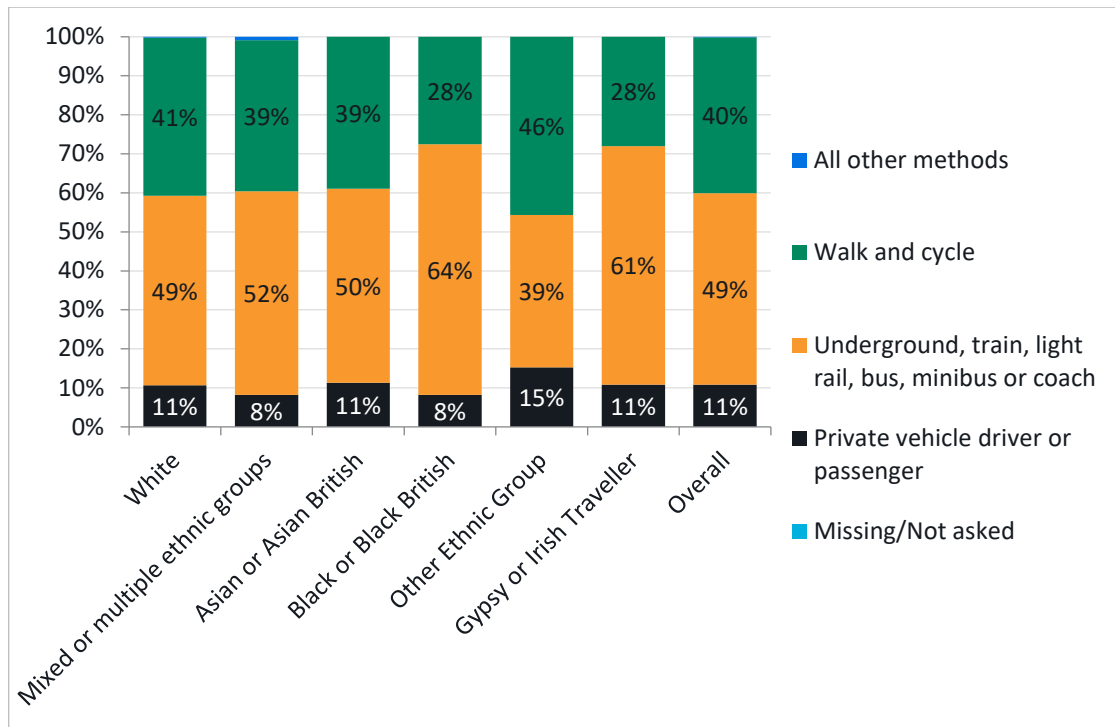
- 4.32 Based on usual travel modes from the LTDS data presented in Figure 4.15, in Westminster, ‘Other ethnic groups’ are most likely to walk and cycle (46 per cent) and least likely to use public transport (39 per cent). Across ethnic groups, car usage is a relatively small proportion, between 8 and 15 per cent.
- 4.33 Overall, in Westminster, levels of car use are lower across all ethnicities compared to the London average (Figure 4.16), while levels of public transport use are higher. While ‘Asian or Asian British’ residents are most likely to use the car in London, this is not the case for Westminster, where 11 per cent say they use the car. ‘Black or Black British’ residents are most likely (41 per cent) to use public transport in London, and they are also most likely to (64 per cent) in Westminster.

Figure 4.15: Mode share by ethnicity in Westminster



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

Figure 4.16: Mode share by ethnicity in London



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

Sex

Definition according to the Equality Act 2010

In relation to the protected characteristic of sex:

- a reference to a person who has a particular protected characteristic is a reference to a man or to a woman;
- a reference to persons who share a protected characteristic is a reference to persons of the same sex.

Baseline equalities data

4.34 Census 2021 data for population by sex is shown in Figure 4.17. In the study area, a marginally greater proportion of residents identified as male (52 per cent), compared to female (48 per cent). In Westminster as a whole, the opposite is true, with 48 per cent of residents identifying as male, and 52 per cent as female. Greater London shows a slightly more even split, with a slightly higher proportion of females (51 per cent) than males (49 per cent).

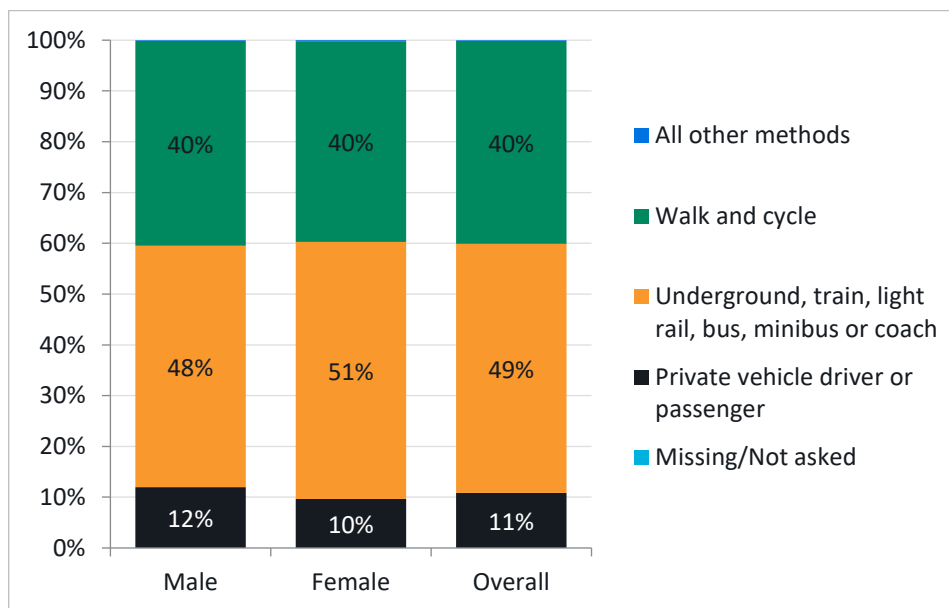
Figure 4.17: Population breakdown by sex in the Study Area, Westminster, and Greater London



Source: Census 2021

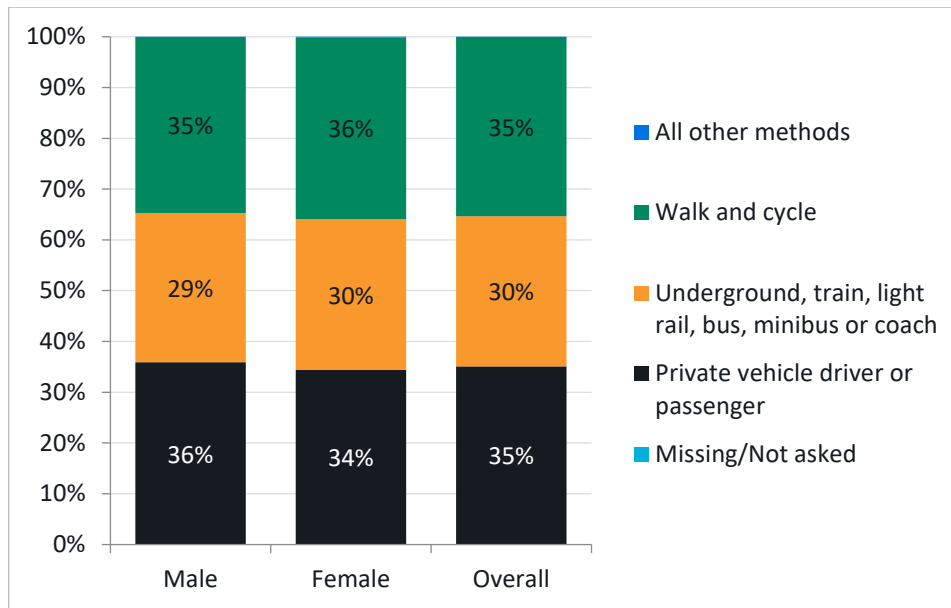
- 4.35 Figure 4.18 presents the mode share by sex in Westminster based on LTDS data. Males are more likely to use a car (12 per cent) than females (10 per cent), however males are less likely to use public transport (48 per cent) than females (51 per cent). The likelihood of using active travel modes, such as walking or cycling are even for both sexes.
- 4.36 Compared to Westminster, overall, both males and females are more likely to use a car and less likely to use public transport in London as a whole (Figure 4.19). The likelihood of walking and cycling is similar for both sexes in London, and in close proportions to Westminster.

Figure 4.18: Mode share by sex in Westminster



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

Figure 4.19: Mode share by sex in Greater London



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

- 4.37 Across Greater London, research undertaken by TfL⁷ shows that females are more likely to use buses than males (62 per cent compared to 56 per cent) but are less likely to use other types of transport including the Tube (38 per cent of females compared to 43 per cent of males).
- 4.38 Female travel needs can be more complex than males due to a range of factors; the increased likelihood of travelling with a buggy and/or shopping affects the travel choices females make, females are also more likely to be carers of children⁸, further affecting the transport choices they make.
- 4.39 Female Londoners make more trips per weekday than male Londoners (2.5 trips compared to 2.3 trips)⁷. This pattern, however, is reversed amongst older adults, with older female Londoners making fewer weekday trips than older male Londoners (2.0 compared to 2.2).
- 4.40 Females aged 17 or over who are living in London are less likely than males to have a full driving licence (58 per cent compared to 72 per cent) or have access to a car (63 per cent compared to 66 per cent). These factors are likely to be related to the frequency of car use as a driver. Almost four in five (79 per cent) females in London report being able to ride a bike, compared to 91 per cent of males.

Sexual orientation

Definition according to the Equality Act 2010

Sexual orientation means a person’s sexual orientation towards

- a. Persons of the same sex
- b. Persons of the opposite sex, or
- c. Persons of either sex

⁷ [Travel in London: Understanding our diverse communities 2019 \(tfl.gov.uk\)](https://www.tfl.gov.uk)

⁸ [National Travel Survey: Travel to School factsheet \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk)

In relation to the protected characteristic of sexual orientation

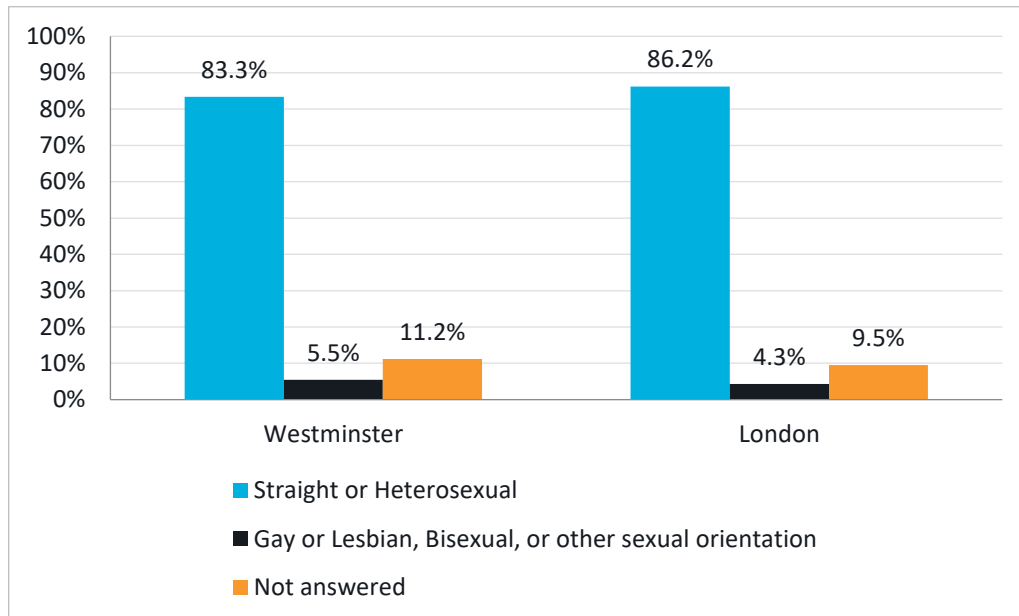
- a. a reference to a person who has particular protected characteristics is a reference to a person who is of a particular sexual orientation.
- b. a reference to persons who share a proctored characteristics is a reference to persons who are of the same sexual orientation.

Baseline equalities data

4.41 Census 2021 data for sexual orientation is only available at the MSOA level or higher. For this assessment we have used City of Westminster level data. This is presented in Figure 4.20 below. The City of Westminster has a lower proportion of residents that identify as ‘straight or heterosexual’ (83 per cent) than London as a whole (86 per cent).

4.42 The proportion of those who identify as ‘gay or lesbian, bisexual, or other sexual orientation’ is slightly higher in Westminster (6 per cent) than for Greater London (4 per cent).

Figure 4.20: Sexual orientation composition for Westminster and Greater London



Source: Census 2021

- 4.43 According to TfL's 'Travel in London: Understanding our diverse communities' study (2019)⁹, Londoners who identify themselves as being LGB (lesbian, gay and bisexual) account for 2.6 per cent of the city's population. It found that LGB people have a similar profile to the general population when asked about barriers to using public transport.
- 4.44 Over half (52 per cent) of LGB respondents cited overcrowding as an issue, compared to 48 per cent of the general population. 41 per cent of both LGB respondents and the general population identified the cost of travel as an issue. 30 per cent of LGB respondents saw passengers pushing and shoving each other on public transport as a key issue, while 26 per cent of the general population raised this as a concern. Overall, it was found that fears about abuse and/or intimidation can have a greater effect on the travel behaviours of LGB Londoners.

Gender reassignment

Definition according to the Equality Act 2010

A person has the protected characteristic of gender reassignment if the person is proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attributes of sex.

A reference to a transsexual person is a reference to a person who has the protected characteristic of gender reassignment.

In relation to the protected characteristic of gender reassignment

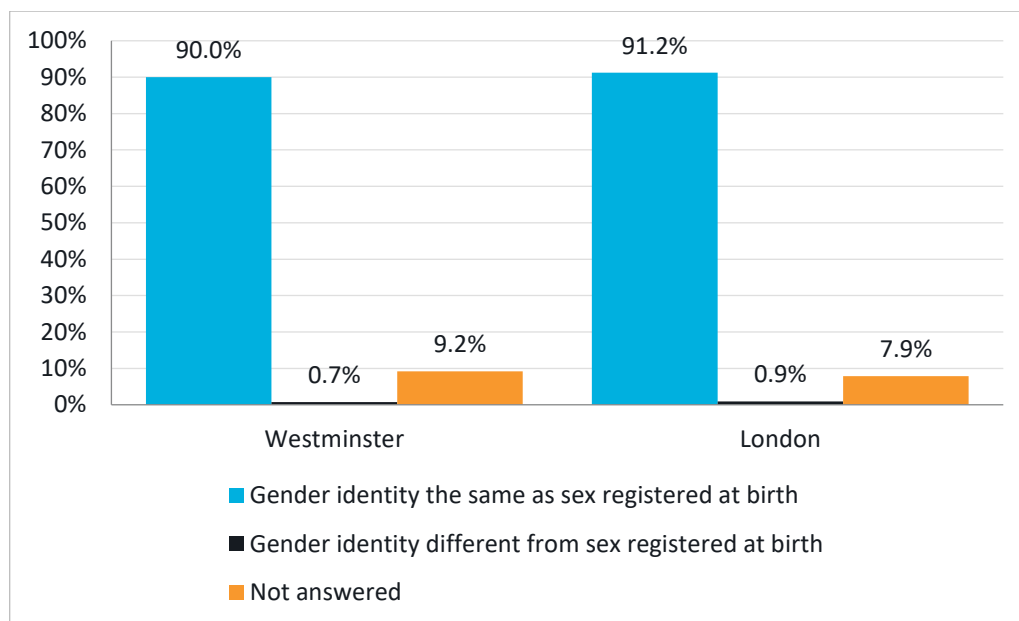
- a. a reference to a person who has a particular protected characteristic is a reference to a transsexual person;
- b. a reference to persons who share a protected characteristic is a reference to transsexual persons.

Baseline equalities data

- 4.45 Census 2021 data for gender reassignment is only available at the MSOA level or higher. For this assessment we have used City of Westminster level data. This is presented in Figure 4.21 below. The City of Westminster has a marginally lower proportion of residents whose gender identity is the same as sex registered at birth (90.0 per cent) compared to London as a whole (91.2 per cent). The proportion of those with gender identity different from sex registered at birth is also slightly lower in Westminster (0.7 per cent) than London as a whole (0.9 per cent).

⁹ [Travel in London: Understanding our diverse communities 2019 \(tfl.gov.uk\)](https://www.tfl.gov.uk/roadshows/research-and-data/understanding-our-diverse-communities-2019)

Figure 4.21: Gender composition of Westminster and Greater London



Source: Census 2021

4.46 According to TransActual UK, for those travelling by public transport, 68 per cent of trans women, 63 per cent of non-binary people, and 60 per cent of trans men have experienced transphobia on public transport¹⁰. Research also shows that LGBTQ+ individuals are likely to encounter higher levels of unsolicited sexual behaviour and harassment on public transport and are more likely to take travel options that are perceived as ‘safer’, sometimes at the expense of longer journey times or higher travel costs¹¹.

¹⁰ [Press release: Trans Lives Survey 2021 — TransActual](#)

¹¹ [Full article: Queer mobilities: critical LGBTQ perspectives of public transport spaces \(tandfonline.com\)](#)

5 Impact Assessment

5.1 Table 5.1 summarises the potential positive and negative impacts of the scheme and the protected characteristics that are disproportionately impacted. These are assessed in further detail in this chapter. This impact assessment has been directly informed by the public consultation feedback, as well as targeted engagement with organisations who represent people with protected characteristics in Westminster.

Table 5.1: Protected characteristics impacted

Potential impacts	Protected characteristics impacted
Positive	
Improved walking environment – wider and resurfaced footways	<ul style="list-style-type: none"> • Age • Disability • Pregnancy and maternity • Sex • Race
Easier to cross the road – improved crossing facilities and improvements to pedestrian safety	<ul style="list-style-type: none"> • Age • Disability • Pregnancy and maternity • Sex
Improved public realm – additional trees, greenery and seating areas, a reduction in street furniture clutter, improved lighting, and improved security	<ul style="list-style-type: none"> • Age • Disability • Pregnancy and maternity • Sexual orientation • Gender reassignment
Improved bus and taxi operation	<ul style="list-style-type: none"> • Age • Disability • Pregnancy and maternity • Race
Negative	
Changes to motor vehicle access	<ul style="list-style-type: none"> • Age • Disability • Pregnancy and maternity
Alterations to Blue Badge parking	<ul style="list-style-type: none"> • Age • Disability
Alterations to footway level loading bays	<ul style="list-style-type: none"> • Age • Disability

Potential disproportionately positive impacts

Improved walking environment – resurfaced and wider footways

- 5.2 The additional 6,100sqm of footway, as well as new footway surfacing along Oxford Street will provide people with additional space and comfort when making trips on foot, particularly at peak hours when pedestrian volumes are at their highest and footways at their busiest.

Protected characteristics likely to be disproportionately impacted

- Age
 - Disability
 - Pregnancy and maternity
 - Sex
 - Race
- 5.3 The improvements to the footways on and around Oxford Street are likely to disproportionately benefit older people, as older people are more likely to live with mobility impairments due to aging, and improved surfacing for walking is likely to create a more comfortable and pleasant environment. This will also disproportionately benefit younger people, specifically those aged under-16 who have the highest mode share for walking (and cycling) in Westminster of 49 per cent. Young children should benefit from reduced stress and an increased perception of safety when walking around the area.
- 5.4 These improvements to the walking environment are also likely to disproportionately benefit people with physical or mental impairments (which may make walking more strenuous or stressful) as in Westminster, they make most of their trips by walking. This increased space for walking is likely to create a more comfortable and pleasant environment.
- 5.5 Improvements to the walking environment are likely to disproportionately benefit those who undertake a greater number of trips on a daily basis. Data indicates women in London take a greater number of trips in comparison to men. Furthermore, Pregnant women, and women with new-born children are also likely to benefit. Improvements to footways, including widening and resurfacing in some locations will create more even surfaces on which to push a pram, improving overall journey experience. Improving and widening footways is likely to disproportionately benefit women in general, particularly due to higher number of trips they make on a daily basis compared to men, as well as their role in taking children to and from educational and recreational facilities.
- 5.6 Improvements to the walking conditions will also disproportionately benefit racial or ethnic groups who are more likely to walk (or cycle) or use public transport as each journey starts or ends on foot or cycle. This will particularly benefit those looking to access stations on or in the immediate vicinity of Oxford Street, including Tottenham Court Road, Bond Street and Marble Arch. In Westminster the most likely ethnic group to walk or cycle is 'Other Ethnic Group', while those more likely to use public transport are 'Black or Black British'.

Potential scheme improvements and mitigation measures

- **Accessibility:** Ensure that additional space created for pedestrians is accessible to all users, for example by ensuring that new space is flush with existing footways, or that dropped kerbs or ramps are provided. This should also be carefully considered during the construction phase, with pedestrians safely separates from hazards and provided with a

safe, continuous, and clearly demarcated route suitable for all users, including people using wheelchairs, mobility scooters, prams, or pushchairs.

Easier to cross the road – improved crossing facilities and improvements to pedestrian safety

- 5.7 The introduction of 12 new pedestrian crossings and 5 new ‘all green’ stages for pedestrians will make it quicker and more convenient to cross Oxford Street, reducing the time that pedestrians must wait, and limiting the distances that people are required to walk to reach a crossing point. Furthermore, the reduction in carriageway widths and increases in crossing widths will reduce the distances required to cross the road.
- 5.8 The new bidirectional cycleway crossing between James Street and Gilbert Street, crossing Oxford Street, will also make it easier and safer to cross Oxford Street for people cycling. This will benefit those more likely to cycle, as well those who use cycles as an essential mobility aids.

Protected characteristics likely to be disproportionately impacted

- Age
 - Disability
 - Pregnancy and maternity
 - Sex
- 5.9 Older people aged 60 and over are more likely to be Killed or Seriously Injured in road traffic collisions than any other age group in Westminster (24 per cent of all collisions). Therefore, any improvements to road safety on and around Oxford Street are likely to disproportionately benefit this group. Disabled people with mobility-related impairments, young children, and pregnant people should also benefit from these improvements as they are especially vulnerable if involved in collisions with motor traffic.
- 5.10 The widening of the footways and reallocation of road space will make it easier and more convenient for people to cross the road, because the carriageway width (and hence crossing distances) will be reduced. These improvements to the walking environment are likely to disproportionately benefit those who are aged under 16 and over 60, who currently make 49 and 41 per cent of journeys by walking, respectively. Furthermore, those aged 16-24 who make 59 per cent of trips by public transport are also likely to benefit disproportionately, as most public transport journeys start or end on foot.
- 5.11 Pregnant women, and women with new-born children are also likely to benefit. Walking can be a tiring and strenuous experience, therefore reducing the distances and time required to wait to cross the road will ease this pressure. Improving crossing points is likely to disproportionately benefit women in general, particularly due to higher number of trips they make daily compared to men, as well as their role in taking children to and from educational and recreational facilities.

Potential scheme improvements and mitigation measures

- **Accessibility:** Ensure that additional space created for pedestrians is accessible to all users, for example by ensuring that new space is flush with existing footways, or that dropped kerbs or ramps are provided. This should also be carefully considered during the construction phase, with pedestrians safely separated from hazards and provided with a

safe, continuous, and clearly demarcated route suitable for all users, including people using wheelchairs, mobility scooters, prams, or pushchairs.

- **Cycle infrastructure:** It is noted that the proposed two-way cycle track connecting Gilbert Street and James Street will cross the footways on both sides of Oxford Street. To improve comfort for both cyclists using the track, and pedestrians crossing it, it is suggested that materials are chosen to clearly demarcate the track from the footpath.
- **Crossing points:** Where possible, pedestrian green times at crossing points could be extended to provide people with additional time to cross the road. This would be particularly beneficial for older people who are more likely to have slower walking speeds, as well as some disabled people with physical impairments.
- For blind and partially sighted people that use a cane to assist with navigation, extending the tactile tail closer to the building line (rather than following national guidance of five metres back from the crossing point) can improve their ability to navigate towards controlled crossing points. Consideration should be given to applying this wherever possible. Consistency in the application of this across the area is key and would particularly help Westminster residents who use the street most often.

Improved public realm – additional trees, greenery and seating areas, a reduction in street furniture clutter, improved lighting, wayfinding, and security

5.12 As part of the public realm improvements to the Oxford Street area, a number of additional trees will be planted, alongside new planting and greenery. The trees will provide shade and shelter from the elements and assist with improving air quality. Greenery and planting will further assist with collecting rainwater, limiting the amount of standing water on the footway and carriageway.

5.13 New public seating areas will provide places for people to sit and rest as they visit or pass through the area, while the reduced clutter of street furniture will maximise the usable space of footways. New and improved lighting throughout the area will make it easier to navigate the streets during both the daytime, and the nighttime, where Oxford Street exhibits differing functions. Elsewhere, new security measures will make the area safer for visitors.

Protected characteristics likely to be disproportionately impacted

- Age
- Disability
- Pregnancy and maternity
- Sexual orientation
- Gender reassignment

5.14 The addition of new seating areas throughout the Oxford Street corridor will provide an opportunity for pedestrians to rest during their journeys. This is likely to disproportionately benefit people with mobility impairments, older people and pregnant women who may be more likely to need to stop and rest.

5.15 The addition of new street trees will also provide protection from the heat of the sun which is likely to benefit these groups as they pass through or dwell in the area. Improved seating can enable people to make longer or more frequent walking journeys. Spending time outdoors, potentially socialising during that time and enjoying the improved environment, can benefit to the improved mental health for all.

- 5.16 LGBTQ+ people can commonly face hate crime and/or harassment, and therefore personal safety when out in public is often a key issue. The improvements to lighting and security across the Oxford Street area should reduce the likelihood of anti-social behaviour and provide people with greater confidence that they can safely spend time or pass through the area.

Potential scheme improvements and mitigation measures

- **Accessibility:** Careful consideration needs to be provided to the design and layout of the new street furniture. This should be consistently in its placing, and careful consideration should be given to the potential impact of blocking any natural desire lines. Blind and partially sighted people often rely on the consistent location of street furniture to navigate. Engagement with blind and partially sighted people showed a clear preference for a clear consistent width of footways free of street furniture.
- The inclusion of paving change to demarcate the “street furniture zones” along the footway would assist users to stay moving in a straight line and avoid obstacles. The use of high contrasting materials is also strongly recommended to ensure that blind and visually impaired people can safely navigate their way around.
- **Advertising of respite areas:** Feedback from disabled people highlighted a desire for more information to be provided about the scheme, particularly once construction was nearing completion. A website for the Programme which highlights all new areas of respite and amenity spaces would allow neurodivergent people (such as people with autism spectrum disorder or attention deficit hyperactivity disorder) to plan their day in detail, making the street more accessible to them.

Improved bus and taxi operation

- 5.17 The east-west bus operation along Oxford Street will be consolidated to a single bus stop at each location, reducing the number of stops along the street, but improving the legibility for bus users. An additional pair of bus stops near Bond Street will be introduced, and bus stop laybys removed to improve bus priority and increase passenger waiting space. Furthermore, simplified bus turnaround areas should lead to bus journey time improvements.
- 5.18 With regard to the operation of taxis, a number of existing taxi ranks will be extended in length to increase their capacity, and four new taxi ranks will be created on Orchard Street, Holles Street, Wells Street and Wardour Street. A number of other taxi bays will be relocated to facilitate public realm improvements.

Protected characteristics likely to be disproportionately impacted

- Age
 - Disability
 - Pregnancy and maternity
 - Race
- 5.19 Bus stop relocations could negatively impact people with mobility issues if they are now required to walk further than previously required. However, the new location of bus stops may also benefit those who are now closer to their destination and are required to walk shorter distances. Without detailed information on the final origins and destinations of bus passengers, it is not possible to quantify whether positive impacts will outweigh negative impacts (or vice-versa).
- 5.20 Some buses which stop on Oxford Street (such as the N7 and N8) offer a 24-hour service. The perceptions of risk to personal security may increase at night, particularly to people who

identify as LGBTQ+, or disabled people who may feel more vulnerable. The improved lighting and security along Oxford Street should improve the perception of safety for these people, subsequently improving the experience of waiting for the bus, particularly late at night.

- 5.21 Expected improvements to bus journey times are likely to disproportionately benefit people who identify as Black or Black British. Black or Black British people are more likely to use buses than any other race, with 'Bus, underground, train, light rail, minibuss or coach' making up 64 per cent of the mode share for this group.
- 5.22 Consolidation of bus stops has the potential to lead to buses queueing up as they wait for the bus(es) in front to drop off or collect passengers. On occasions where multiple buses are queued waiting to access the stop, this may lead to blind and partially sighted passengers being unable to identify where their bus is. This could lead to a reduction in service quality for these passengers, which may deter them from visiting the street during peak periods.
- 5.23 All licensed taxis are required to be fully wheelchair accessible and obliged to carry any disabled person who may require mobility assistance (without additional charge)¹². The proposals to extend existing taxi ranks and introduce new ranks may increase access to taxis to Oxford Street, which is likely to benefit disabled people and pregnant people who often rely on taxis as an essential method of transport.

Potential scheme improvements and mitigation measures

- **Monitoring and evaluation:** In collaboration with Transport for London (TfL), it is recommended that WCC monitors the new bus and taxi operations to understand their performance, and the satisfaction of users with the changes. Alterations to the design or layout of these changes should be considered if necessary.

Potential disproportionately negative impacts

Changes to motor vehicle access

- 5.24 Changes are proposed to motor vehicle access on some of the side roads which intersect with Oxford Street. This includes some modal filtering (Gilbert Street and Davies Street closed to motor traffic at Oxford Street) and changes to turning restrictions and one-way systems. This may make some journeys longer as drivers are required to take alternative routes. This could have an impact on some protected characteristics who are more sensitive to changes in journey time.

Protected characteristics likely to be disproportionately impacted

- Age
 - Disability
 - Pregnancy and maternity
- 5.25 While the proposed scheme is likely to create healthier streets for residents and visitors, the changes to motor vehicle access on certain streets may lead to longer journey times for people travelling by car – this may include people who are reliant upon private cars or taxis for mobility. Private cars and taxis can be particularly necessary for people aged 65 and over, who are more likely to be living with physical impairments which prevent them using alternative modes of transport.

¹² <https://www.legislation.gov.uk/ukpga/2010/15>

- 5.26 Travelling can also be uncomfortable for some people (for example, those who live with anxiety, or those who require quick access to toilets), particularly for older people, therefore extended journey times could exacerbate this issue. It is important to recognise however that the number of people affected in this way is likely to be limited due to the relatively minor scale of the scheme.
- 5.27 Older people often rely upon family members or friends for daily care. The 2011 Census indicates that over 687,000 Londoners spend at least an hour a week caring for someone – equivalent to 8.5 per cent of the population. The changes to motor vehicle access in the area, though relatively minor, may negatively impact some older people via the potential increase in journey times and/or distance for carers who visit the area in a private car. This may have a negative impact on those reliant upon this care.
- 5.28 In the short to medium term as the scheme is constructed, congestion may increase on the surrounding road network and Oxford Street itself. As such, during the construction period, this may impact some of those relying on private vehicles, taxis, Dial-a-Ride and buses. Some of those with disabilities may find travelling uncomfortable, and as such, increased travel times for those using these modes could exacerbate this.

Potential scheme improvements and mitigation measures

- **Early and targeted engagement:** To minimise the impact of the changes to motor traffic, it is recommended that WCC engages on the changes as early as possible and provides residents with an avenue to continually feedback on the permanent scheme post-implementation, particularly with regard to any impact on providing or receiving care due to increased journey times. While it is acknowledged that the proposed changes to motor traffic are relatively minor, and likely to only affect a limited number of people, there will be a residual impact to the proposals.

Alterations to Blue Badge parking

- 5.29 To accommodate public realm, delivery and servicing and taxi access improvements, a number of Blue Badge parking bays are proposed to be relocated and/or removed. The existing Blue Badge bays on Duke Street north are to be moved to Duke Street south, and the Blue Badge bays on Wells Street and Berwick Street are to be removed.

Protected characteristics likely to be disproportionately impacted

- Age
 - Disability
- 5.30 Blue Badge parking provides people who rely upon private car usage with a convenient and accessible place to park. The removal of the Blue Badge bays on Wells Street and Berwick Street is likely to have a disproportionately negative impact on Blue Badge users as they will now be required to park elsewhere within the Oxford Street area. This may increase their overall journeys as they try to find an alternative parking bay, or the distance that they need to walk from the bay to their final destination.
- 5.31 The relocation of some Blue Badge bays could negatively impact people with mobility issues if they are now required to walk further than previously required. However, the new locations may also benefit those who are now closer to their destination and are required to walk shorter distances. Without detailed information on the final origins and destinations of bus

passengers, it is not possible to quantify whether positive impacts will outweigh negative impacts (or vice-versa).

Potential scheme improvements and mitigation measures

- **Relocation:** Explore the possibility of relocating the Blue Badge bays which are proposed to be removed from Wells Street and Berwick Street. This would ensure that the provision of Blue Badge bays does not decrease within the area.

Alterations to loading bays

- 5.32 A number of footway level loading bays are proposed as part of the scheme. These loading bays reduce the effective footway width when in use and can potentially cause obstructions for people with visual and/or mobility impairments.

Protected characteristics likely to be disproportionately impacted

- Age
- Disability

- 5.33 The new loading bays may cause obstructions to visually impaired users of Oxford Street who may have greater difficulty in navigating around them. Areas that are flush with the footway can be problematic for blind and partially sighted people and can be dangerous in certain circumstances.

Potential scheme improvements and mitigation measures

- **Loading bay design:** For the design of the loading bays themselves, it is recommended that colour and/or texture is used to clearly delineate the edge of the loading bay, making it easier for visually impaired people to navigate along Oxford Street. To prevent damage caused by heavy goods vehicles on the loading bays, and consequently trip hazards which can arise, the footway should be considerably strengthened to carriageway standard (including culverts and covers for services, if relevant).
- **Operating hours:** To limit the impact that the loading bays have on the effective footway widths, it is recommended that the delivery and servicing activity is limited to off-peak times, where footfall is at its lowest.

6 Summary of Recommended Mitigating Actions

- 6.1 Table 6.1 (overleaf) presents an action plan for each of the mitigating actions identified within this EqIA. For each action, an action owner has been identified who will be responsible for ensuring that the action is progressed. Furthermore, timescales are outlined to assist with monitoring of this document.
- 6.2 This EqIA is a 'live' document. This iteration of the EqIA assesses the original scheme proposals and incorporates feedback received through public and targeted engagement. The EqIA will be updated following any design amendments to the scheme.
- 6.3 To ensure transparency of the design and decision-making process, it is recommended that an update on the status of each recommended mitigating action is included within a future addendum to this EqIA.

Table 6.1: Action plan

Protected characteristic	Issue identified	Action required/comments	Action owner	Timescale
Age, Disability, Pregnancy and Maternity	Accessibility and safety	Implement clear colour/texture delineation between loading bays and the general footway. Determine that strengthened materials are used on loading bays, culverts, and service covers (to mitigate the impact of heavy delivery and servicing vehicles), to reduce damage to the surfacing and consequential trip hazards.	Project Manager	Prior to scheme implementation
Disability	Accessibility and safety	The inclusion of paving change to demarcate the “street furniture zones” along the footway would assist users to stay moving in a straight line and avoid obstacles. The use of high contrasting materials is also strongly recommended to ensure that blind and visually impaired people can safely navigate their way around.	Project Manager	Prior to scheme implementation
Age, Disability, Pregnancy and Maternity	Accessibility	Temporary footway arrangements should be designed to maximise pedestrian comfort. Where ramps are required, slope heights should be considered to minimise impact on wheelchairs, mobility scooters and prams/pushchairs.	Project Manager	During scheme construction period
Disability	Accessibility	Consider the creation of a website for the Programme which highlights all new areas of respite and amenity spaces would allow neurodivergent people (such as people with autism spectrum disorder or attention deficit hyperactivity disorder) to plan their day in detail, making the street more accessible to them.	Project Manager	Prior to scheme implementation
Disability, Age	Accessibility	Where possible, pedestrian green times at crossing points could be extended to provide people with additional time to cross the road. This would be particularly beneficial for older people who are more likely to have slower walking speeds, as well as some disabled people with physical impairments.	Project Manager	Prior to scheme implementation

Disability	Accessibility	For blind and partially sighted people that use a cane to assist with navigation, extending the tactile tail closer to the building line (rather than following national guidance of five metres back from the crossing point) can improve their ability to navigate towards controlled crossing points. Consideration should be given to applying this wherever possible.	Project Manager	Prior to scheme implementation
Age, Disability, Pregnancy and Maternity	Public transport accessibility	Monitoring of bus and taxi performance (in collaboration with TfL) should be undertaken to identify any issues resulting from the implementation of the scheme.	Project Manager	During scheme operation
Age, Disability, Pregnancy and Maternity	Pedestrian safety	The bidirectional Cycleway on James St/Gilbert St should be clearly demarcated where it interacts with the footway on Oxford Street.	Project Manager	Prior to scheme implementation
Age, Disability	Parking availability	Determine if there are any impacts resulting from the proposed relocation of the Blue Badge parking bays (Wells Street and Berwick Street) relating to accessibility of specific land uses. Look to relocate the spaces in the immediate vicinity (no more than 100m from the current location).	Project Manager	Prior to scheme implementation

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