

Appendix 4: Equality Impact Assessment

Directorate: Highways and Transport

Service: Project Delivery

Team PD – General

Proposal being assessed: **Mill Road permanent TRO scheme**

Key service delivery objectives and outcomes:

Active travel, including walking and cycling, is a priority and local transport objective in Cambridgeshire. All transport infrastructure requirements and schemes are recorded in the Cambridgeshire Transport Proposals Database. Schemes are prioritised and funding sought as opportunities arise. Cambridgeshire and Peterborough Combined Authority (CPCA) is the local transport authority for Cambridgeshire. Active and sustainable travel are amongst the objectives as detailed in the draft CPCA Local Transport and Connectivity Plan.

“Employment - Connect all new and existing communities sustainably so all residents can easily access a good job within 30 minutes by public transport, spreading the region’s prosperity

Resilience - Build a transport network that is resilient and adaptive to human and environmental disruption, improving journey time reliability

Accessibility - Promote social inclusion through the provision of a sustainable transport network that is affordable and accessible for all Health & Wellbeing - Provide ‘healthy streets’ and high-quality public realm that puts people first and promotes active lifestyles

Climate Change - Reduce emissions to as close to zero as possible to minimise the impact of transport and travel on climate change

Funding and delivery of an accessible, resilient, sustainable and safe local transport network”.

What is the proposal:

In May 2020, following the outbreak of the Covid 19 pandemic, the Government made £250M Emergency Active Travel Fund monies available for pop-up cycle lanes, wider pavements and cycle and bus corridors to enable social distancing and encourage people to choose to walk or cycle than drive.

The CPCA asked Cambridgeshire County Council (CCC) and Peterborough City Council (PCC) to develop proposals for experimental active travel schemes; one of the proposed schemes included measures to address issues on Mill Road, Cambridge – narrow pavements in an area with high footfall to shops, restaurants and businesses and a high volume of motor and cycle traffic sharing a carriageway of restricted width. Mill Road suffers from high levels of through traffic, which combined with local traffic and the high number of pedestrians and cyclists, causes

significant congestion, particularly at peak times, and an unpleasant environment. Air pollution and a poor road safety record are directly related to these issues.

After discussions with local councillors, it was agreed that a Bus Gate on Mill Road bridge would allow for the removal of through traffic and create additional space for social distancing. A series of temporary build-outs was also installed along Mill Road to encourage social distancing and slower traffic speeds.

An Experimental Traffic Order (ETO) restricting vehicular traffic over the railway bridge, except for buses, emergency vehicles, cyclists and pedestrians came into force on 24 June 2020. [In principle an ETO can run for a limited period of up to 18 months with formal objections to be made in writing in the first 6 months after it comes into force.] A public survey on the Bus Gate was also undertaken during the objection period.

Feedback from the first 6 months, together with the public survey, showed a mixed response from the public with a balanced view from those supporting or opposing making the ETO permanent. Recurring themes included: the transport and environmental benefits for many users, especially non-motorised users, the negative impact on businesses due to reduced passing trade, displaced traffic on residential roads and the need to use longer routes impacting negatively on people of low income and taxi users. The need for blue badge holders and taxis to be exempt from the traffic restrictions was raised at this stage. Analysis of the public survey suggested that a number of duplicate responses may have been submitted which may have influenced the number of responses supporting or opposing the Bus Gate scheme.

On 27 July 2021 the Highways and Transport Committee resolved to remove the Bus Gate restriction and undertake a full review and consultation on the options and use of Mill Road; in November 2021 the Committee asked the Greater Cambridge Partnership (GCP) to undertake the work to review and consult on options for Mill Road within the context of its City Access proposals.

The GCP review of Mill Road was carried out in Spring 2022 and included focus group meetings and workshops with key stakeholders and a public consultation between 7 February and 21 March. 1,986 responses were received in total, with clear support (72%) for the re-instatement of the Mill Road Bus Gate but with important caveats such as allowing exemptions for disabled people and taxis. 83% of respondents also supported improvements to the public realm, walking, cycling and local parking along Mill Road.

On 12 July 2022 a report on the GCP review was considered by the Committee who agreed to progress with the next steps to enable the implementation of the Bus Gate. A statutory consultation on making a TRO permanent, with exemptions including disabled people and taxis, would be required. The Committee also resolved to work with the CPCA and GCP on a public realm scheme, to work with GCP on the Network Hierarchy Review and to monitor and review traffic levels should the modal filter be reintroduced.

A statutory consultation on a proposed TRO to close Mill Road bridge to all vehicles, except buses, bicycles, emergency services, taxis, and blue badge holders (who may apply to register up to two vehicles on the Permitted Vehicles List for the Mill Road bus gate) was held between 9 August and 13 September 2024.

A report will be presented at a special Highways and Transport Committee meeting on Friday 4 October and a decision made on whether or not to approve the TRO.

This scheme-specific Equality Impact Assessment (EqIA) focuses on the impact the scheme would have if approved.

What information did you use to assess who would be affected by this proposal?:

The proposal had been assessed against how it fits with government guidance, direct transport benefits and impacts on the wider network, and the capability to deliver them quickly. An initial EqIA for the 2020-21 ETO Bus Gate was produced considering the impact on protected characteristics. The 2020-21 Bus Gate was in place for just over a year so a detailed consideration of protected characteristics has been able to be made to assist with a decision on the proposed TRO scheme.

Analysis of the GCP consultation results and meetings with disability groups also provided useful feedback.

The following reports informed the consideration of protected characteristics. This list is not exhaustive:

Air Quality Monitoring, Mill Road, Cambridge, 2021 – Anne-Marie Hindley, Cambridge City Council

2024 Air Quality Annual Status Report (ASR) - Cambridge City Council

Evaluation of Low Traffic Neighbourhood (LTN) impacts on NO2 and traffic, 2022 - Xiuleng Yang, Emma McCoy, Katherine Hough, Audrey de Nazelle

The Impact of Introducing a Low Traffic Neighbourhood on Street Crime, in Waltham Forest, London, 2021 - Anna Goodman, Faculty of Epidemiology and Population Health, London School of Hygiene and Tropical Medicine and Rachel Aldred, Active Travel Academy, University of Westminster

Changes in Motor Traffic inside London's LTNs and on Boundary Roads, 2023 – Asa Thomas & Rachel Aldred, Active Travel Academy, University of Westminster

Invisible cyclists? Disabled people and cycle planning – A case study of London, 2018 – Neil Andrews, Isabelle Clements & Rachel Aldred

Are there any gaps in the information you used to assess who would be affected by this proposal?:

The County Council is satisfied that the evidence available is adequate and sufficient to enable it to form relevant judgements for the purposes of assessing the impact of the proposals upon the equality objectives in accordance with its public duty under section 149 of the Equality Act.

Does the proposal cover:

All service users/customers/service provision countywide

Which particular employee groups/service user groups will be affected by this proposal?:

The Mill Road community: the restriction on through access over the Mill Road bridge would have impacts on most people who live, work or access facilities on Mill Road as they would no

longer be able to travel over the railway bridge in a motorised vehicle except by bus, taxi or in a registered exempt vehicle. They would therefore need to find an alternative route by car or choose to walk or cycle if they are able to do so.

The council has considered those users with protected characteristics. Exemptions would be in place, including for blue badge holders who would be able to register up to two vehicles which may be either their own vehicle or a vehicle belonging to a carer. It should be noted that one in four disabled people in Cambridge cycle to work.

There would be a negative impact on members of the community who usually access their place of worship by travelling by private vehicle over the bridge and may be required to undertake a longer journey to do so. These users may be disproportionately impacted by the Bus Gate, as they may not have alternative options of places to worship so may have to drive additional mileage.

Those who are able could walk or cycle as an alternative; those who have impaired mobility but are not blue badge holders may be impacted to some extent by the scheme but again no more so than other members of the public.

Many pregnant women would be able to walk but there may be an impact on those who are pregnant and rely on travelling by car, especially in the later stages of pregnancy; the impact would be no greater than on other members of the public and travel by bus/taxi may be a viable alternative.

Other than the above, it is not considered that the Bus Gate would disproportionately impact other individuals with a protected characteristic as they would experience the same level of inconvenience as other users, who may undertake a longer drive to avoid the Bus Gate, or travel via alternative modes.

There is public parking on either side of the railway bridge (in Gwydir Street and Great Eastern Street). Blue badge holders will be able to seek an exemption by applying to register vehicles which would be allowed to travel over the bridge. The Order will therefore have a neutral impact on people with a disability who are a blue badge holder. Blue badge holders are still able to park on yellow lines, providing that it is not during the hours of operation of a prohibition on loading/unloading, thus enabling closer access to their destination.

Feedback from the earlier 2020-2021 Bus Gate suggested that the reduction in vehicular traffic had a positive impact on those using mobility aids due to reduced pavement parking. The additional needs of the disabled have been considered in the design of the proposed bus gate.

New disabled parking bays may form part of a future public realm scheme in the area. It was noted that the temporary build-outs of the earlier Bus Gate along Mill Road reduced the opportunity for blue badge holders to park closer to some of their destinations and there was, therefore, a negative impact to blue badge holders with regards to the build-out design. This information has informed the design of the new Bus Gate and will be useful when designing the public realm scheme.

Taxis or private hire vehicles (PHV) would be exempt so access over the bridge will remain as existing and will therefore have a neutral financial impact on all residents, including the disabled and/or elderly, who rely on taxis or PHVs as a mode of transport. Any users who previously drove but now choose to travel by Taxi or PHV would incur a new costs, through it is considered that there are a range of alternative options including Active Travel and public transport.

The Bus Gate scheme would support the use of sustainable transport methods such as walking, cycling and buses by creating a more reliable bus route. This would have a positive impact on people who perhaps cannot afford to own a private car (or choose not to) but are able to use alternative modes of travel. Feedback from the bus operator indicated reduced delays and improved reliability of journey times along the corridor during the earlier Bus Gate scheme due to the reduction in congestion. This should make bus services more attractive. Sustainable modes of travel align with the CPCA and CCC Net Zero and healthy lifestyles strategic objectives.

Access on Mill Road would only be restricted at the railway bridge; all vehicular traffic would have access up to each end of the bridge. Signage would be in place to notify road users of the restrictions and that all businesses remain open. The increase in journey times to access businesses or properties on or near to Mill Road would impact visitors, employees and delivery vehicles who would no longer be able to travel over the bridge.

The improved safety for pedestrians and cyclists would have a positive impact on residents and visitors to Mill Road of all demographics who choose to walk or cycle on the road. Feedback from the earlier Bus Gate scheme noted that the reduction in motorised traffic and pavement parking allowed safer, more accessible travel for young and older pedestrians and cyclists or families using these modes of transport. It therefore had a positive impact on younger people and families, as well as the wider community who chose to walk and cycle more. Under the new scheme the reduction in traffic may lead in the longer term to improved air quality and reduced noise pollution which would have a positive impact on those accessing businesses, facilities and places of worship on Mill Road.

Some feedback from the earlier Bus Gate period made reference to a perceived reduction in personal safety along Mill Road at night due to lower traffic levels, and in particular the impact on lone women at night who may choose to walk instead of paying for a longer taxi journey. With taxis being allowed through the proposed Bus Gate, this may reduce some of the fears associated with personal safety.

The wider community: the restriction on through access over the Mill Road bridge could impact on the wider community. The restriction of through traffic over the railway bridge would impact on road users who previously used Mill Road to access Cambridge city centre – the proposed Bus Gate would mean they may experience longer journey times using alternative routes. However, there would be no significant disproportionate impact, or unfair disadvantage, on people with protected characteristics. Residents of surrounding roads may be impacted by the traffic displaced by the restrictions on Mill Road. There are a number of arterial roads, such as Coldhams Lane, Newmarket Road and Hills Road that would be used as alternative routes, as well as some side streets off Mill Road. These roads may experience increased traffic levels and the negative impacts this causes, such as increased noise and air pollution and a more unpleasant walking or cycling environment. The increased traffic on alternative routes may have some impact on people with protected characteristics, for example those with respiratory problems or reduced mobility. But it should be noted that Cambridge City Council's monitoring of the full bridge closure in 2019 revealed "*there was no discernable corresponding change in air pollutant concentrations*" on the diversion routes. Cambridge City Council's *2024 Air Quality Annual Status Report (ASR)* stated that monitored levels of NO₂ have remained well below pre-COVID levels in both 2022 and 2023. AQ monitors on Mill Road and Tenison Road show the levels have been reducing year-on-year and are well below the objective levels:

	2019	2020	2021	2022	2023
Mill Road	21	16	15	18	18
Tenison Road	20	15	14	17	15

Overview: the Mill Road Bus Gate proposal intends to reduce inequality by promoting public health by enabling safe and sustainable journeys and reducing the harmful impacts of motor traffic. The scheme has the potential to provide a green legacy in respect to increasing active travel.

Does the proposal relate to the equality objectives set by the Council's Single Equality Strategy?:

Yes

Will people with particular protected characteristics or people experiencing socio-economic inequalities be over/under represented in affected groups:

Roughly in line with the population

Does the proposal relate to services that have been identified as being important to people with particular protected characteristics/who are experiencing socio-economic inequalities?:

No

Does the proposal relate to an area with known inequalities?:

No

What is the significance of the impact on affected persons?:

People with protected characteristics will be able to travel through the Bus Gate on foot, by bicycle, by bus, by taxi/PHV and, if they are Blue Badge holders, by registering vehicles on the Council's Permitted Vehicles list such that they are exempt from the Bus Gate restrictions. The intention is that all Blue Badge holders will be eligible to register two vehicles (noting that decisions will be taken on a case by case basis and that the Council will have a discretion to grant exemptions for more or less than two vehicles). The ability to seek an exemption would not be limited to only those living in the local area because it is felt this could be discriminatory to those who live outside the local area who regularly travel to work, or use the amenities, on Mill Road.

Equally taxis/PHVs would not be restricted to only those with a Cambridge City Council licence because this may negatively impact on taxi/PHV users who start or end their journey to Mill Road from outside the city.

Category of the work being planned:

Project

Is it foreseeable that people from any protected characteristic group(s) or people experiencing socio-economic inequalities will be impacted by the implementation of this proposal (including during the change management process)?:

Yes

Please select:

Age, Disability, Pregnancy and maternity, Socio-economic inequalities

Research, data and /or statistical evidence:

Government traffic management guidance in response to COVID-19 Government guidance on reallocating road space National Travel Survey and Cambridgeshire traffic monitoring report

Legislation relating to Traffic Regulation Order and the application of public sector equality duties.

Consultation evidence:

The GCP undertook an extensive public consultation in Spring 2022 with focus groups and workshops. An analysis report of the consultation results was appended to the Highways & Transport Committee report for the 12 July 2022 meeting.

A statutory consultation was carried out (9 August to 13 September 2024) in accordance with regulation 6 of the 1996 Regulations, and specifically that the groups identified in item 7 of regulation 6 were consulted, including such other organisations representing persons likely to be affected by any provision in the order as the order making authority thought it appropriate to consult.

Based on all the evidence you have reviewed/gathered, what positive impacts are anticipated from this proposal?:

Reduced volume of traffic and improved space for cycling would encourage more people to cycle along Mill Road, including young people travelling to school, families and wider demographics taking up cycling instead of using a private car.

Reduced volume of traffic would create a safer and more pleasant environment for pedestrians to walk along Mill Road and spend more time there.

Reduced congestion on Mill Road would create an improved bus corridor and result in fewer delays to bus services. More reliable bus routes would make travelling by bus a more attractive form of travel and positively impact users who are unable to travel by private car.

Reduced volume of traffic and congestion would improve road safety and provide a more pleasant environment to spend time in.

Based on consultation evidence or similar, what negative impacts are anticipated from this proposal?:

The equality objectives under section 149 of the Equality Act 2010 are:

(1) To eliminate discrimination, harassment, victimisation and any other conduct prohibited by that Act,

(2) To advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it.

(3) To foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

There may be an increase in journey time for those travelling by motor vehicle who would usually travel over Mill Road bridge to access services on or around Mill Road, or who use it as a through route – this could include community nurses, agency care workers and informal carers as well as older road users who do not have a Blue Badge. Whilst there is a risk of some adverse impact upon the above objectives, that impact is very minor and proportionate to the benefits of the scheme.

There may be increased congestion and air pollution on alternative routes which may have some adverse impacts some individuals with the protected characteristics. The Council would continue to monitor.

Perception of reduced personal safety of pedestrians, with lower traffic levels, in particular at night-time. Again, this may impact upon the above equality objectives, but is very minor and proportionate to the benefits of the scheme.

How will the process of change be managed?:

If the TRO scheme is approved, comms will be undertaken to ensure the public are aware of the changes and of the registration system for exempted vehicles. Engagement with Disability groups will be of particular importance to ensure the Bus Gate and exemptions registration process is fully understood. Engagement with local businesses, community groups, faith groups etc on the forthcoming public realm improvements may also allow further opportunities to provide information about the TRO scheme.

A decision will be made by members of the Highways and Transport committee on 4 October 2024.

How will the impacts during the change process be monitored and improvements made (where required)?:

The earlier Bus Gate was in place for over a year (June 2020 to August 2021) if the TRO is approved and a Bus Gate reintroduced, those affected by the changes who were present between June 2020 and August 2021 may be able to draw on their knowledge of the previous scheme to adapt once more to traffic restrictions on the bridge. People who are new to the area will not have that experience, however, so engagement with the local community, faith groups and GP surgeries is required. For people who feel they were significantly negatively affected by the previous scheme, permanent traffic restrictions may cause them stress or distress. For those who benefitted from the previous scheme, the reintroduction of traffic restrictions should be a positive change.

Equality Impact Assessment Action Plan:

Details of negative impact (e.g. worse treatment/outcomes)	Groups affected	Severity of impact	Action to mitigate impact with reasons/evidence to support this or justification for retaining negative impact	Who by	When by
If the alternative routes require longer journeys, there may be a financial impact on people who rely on motor vehicles as a form of travel	Age, Disability, Pregnancy and maternity, Socio-economic inequalities	Low	Mitigation is required through the ability to apply for exemption on a case by case basis. Opening up the bridge to additional general categories of people would undermine the aims of the scheme. It would be very difficult to provide or administer a system that would allow some specified categories of vulnerable or low income people to travel over the bridge but not others. There are also insufficient resources to run such a registration system	Highways & Transport Committee	25.04.2025
Community nurses, agency care workers and informal carers (family, friends, neighbours) would in some instances have longer journeys	Age, Disability, Socio-economic inequalities	Low	Work with NHS, care agencies and local community to ensure they are aware of the changes and where possible can adapt/change rounds. Provide for exemptions on a case by case basis where appropriate.	Project Team	25.04.2025
Increased traffic flows and congestion on side roads/alternative routes	Disability, Socio-economic inequalities	Low	Traffic and air quality monitoring; interventions if required	Project Team, Executive Director, C/VC	19.12.2025

<p>Impact of reduced traffic flow on perception of personal safety along Mill Road, particularly at night</p>	<p>Age, Disability, Gender Reassignment, Pregnancy and maternity, Religion or belief (including no belief), Sexual orientation, Race</p>	<p>Low</p>	<p>Monitor activity levels – the new Bus Gate should increase footfall in the area at night. Taxis/PHVs would be exempt from the traffic restrictions unlike previously. Work with schools, colleges, local community and faith groups on the public realm improvements so the views of the affected groups can feed into the design of any future measures.</p>	<p>Project Team</p>	<p>19.12.2025</p>
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