



Tools

for

Inclusion

Equality Impact
Assessment in Local
Authority Streets Practice

Contents

1	Executive summary	1
	Findings	1
	Recommendations	2
2	Introduction	3
3	Background	4
	Design and planning context.....	6
	Guidance on Equality Impact Assessment	9
4	Local Authorities	10
	Equality Strategies and Mainstreaming	11
	Equality Impact Assessment at Local Authority level	12
	Local placemaking and streets guidance	14
	Local Development Plans	15
	Individual projects.....	17
5	Conclusions	19
6	Ways forward	23
	Appendix: Summary of local authority documents	25
	Acknowledgements.....	35

1 Executive summary

We should be ensuring that everyone has equal access to public space and feels equally welcome in it. This requires a solid understanding of the why and how of inclusion across the full diversity of people, and a commitment to implementing this at every level of street design, planning and repair. While the Equality Act 2010 and policies that flow from it would seem to offer a strong framework for ensuring that equalities considerations are embedded in ways that deliver this vision, in practice we know that the experiences of the range of walkers and wheelers in Scotland's streets are very far from equal.

This report looks at the use of Equality Impact Assessment (EqIA) in delivering the requirements of the Public Sector Equality Duty in public space projects developed by local authorities in Scotland, and in particular how they address the inclusion of disabled and older people.

Findings

We found that there were more EqIAs completed for local plans than individual projects, with only four available over 20 individual projects. EqIAs varied hugely in quality and depth, and we found little to no evidence that good practice was being disseminated either "downwards" from national and whole-authority level to street level, or "laterally" from individually excellent projects. There was also a relatively low engagement with streets and place issues in equalities planning and monitoring documents at local authority level.

Recommendations

- The role of continuing professional development should be examined both with professional bodies and with local authorities and consultancies as employers, alongside discussions with universities and others involved in initial training.
- We must continue to proactively encourage people from diverse backgrounds into street design and management. Many issues will be immediately more visible and talked about within a more diverse community.
- There is a role for some work to bring together these examples of excellence and disseminate them to individual practitioners who might be resourced as “equality champions”, either within their local authority, consultancy or their profession.
- Training and information should be developed for councillors on planning committees to better understand the role of equalities in this area
- All EqIAs should be held in a central and visible public place, either locally or nationally. The state of practice should be reviewed from time to time by a suitably qualified body e.g. the Equalities and Human Rights Commission.
- The option of building the Mobility and Access Committee for Scotland (MACS) or local Access Panels into local authority scrutiny of place and transport projects, with appropriate funding, should be examined.
- Local authorities should promote the use of practice tools such as street audits ahead of developing schemes, with a focus on capturing the diverse views of communities.
- Equalities groups should be resourced to work with local authorities and practitioner organisations to develop practical tools for equalities practice.



2 Introduction

Streets are for everyone. Everyone deserves to be able to be in and travel through our public spaces safely and reliably. However, for older and disabled people in particular, the street environment can present physical, sensory and cognitive barriers to this freedom of access.

This report looks at the potential and actual role of the Public Sector Equality Duty (PSED) and Equality Impact Assessment (EqIA) in promoting equality in access to and use of streets and public space in Scotland. It uses a sample of Scottish Local Authorities' work on place and streets to assess the extent to which EqIAs are carried out, their scope and quality, and where else equalities considerations in streets and place projects are publicly documented.

This is a project with a deliberately tight scope, looking at the use and documentation of a single tool specifically within local authorities. We hope this will provide an insight into where equalities considerations are embedded in place and active travel in Scotland and how they are communicated. Communication is critical both from a top-down national policy level and locally throughout local authorities. This initial mapping will then suggest points for further investigation and opportunities for effective intervention to improve the inclusiveness of our streets.



3 Background

The Public Sector Equality Duty was introduced in the Equality Act 2010¹. It requires public authorities to have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation
- Advance equality of opportunity between different groups
- Foster good relations between different groups

There is no limit in legislation to the areas or levels of operation to which the PSED applies; the Equality and Human Rights Commission says in its guidance² that: “[t]o ‘have due regard’ means that in carrying out all of its functions and day to day activities a public authority subject to the duty must consciously consider the needs of the general equality duty” and “[t]here should be evidence of a structured attempt to focus on the details of equality issues.”

The Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012³ brought in requirements for public authorities, specifically councils, to analyse and report on their equalities performance. This obligation exists at the whole-authority level.

None of the formal guidance on the Act at national level specifies a format for assessing the impact of a policy on equalities. It is left up to individual authorities to develop assessment and reporting methods. In many cases, this process is combined with methods to assess how a policy is

¹ <https://www.legislation.gov.uk/ukpga/2010/15/section/149>

² <https://www.equalityhumanrights.com/sites/default/files/essential-guide-public-sector-equality-duty-scotland.pdf>

³ <https://www.legislation.gov.uk/sdsi/2012/9780111016718/contents>



aligned with the Fairer Scotland Duty⁴. This adds obligations around the impact of policies on socio-economic disadvantage to other monitoring obligations.

⁴<https://www.gov.scot/publications/fairer-scotland-duty-interim-guidance-public-bodies/pages/2/>



Design and planning context

The Scottish Government's Designing Streets⁵ policy sets out the national standards for street design. Designing Streets considers equalities primarily in the context of the Disability Equality Duty (Disability Discrimination Act 2005)⁶, as it predates the Equality Act. This relates road design specifically to the Transport Scotland guidance on the DDA⁷. The Disability Equality Duty was replaced and extended by the PSED when the Equality Act repealed the Disability Discrimination Act. While that guidance applies specifically to Transport Scotland projects, its principles, suggesting a structured approach to equalities, could apply to local authority projects too. It also gives concrete examples of the applicability of impact assessment and the role of access panels. Its approach to design draws significantly on the UK Government's *Manual for Streets (2007)*⁸ but, while it emphasises the transport hierarchy, the majority of mentions of disability are in the context of parking. Parking as the primary consideration of disabled people's needs is a theme that recurred throughout the schemes we reviewed.

Society of Chief Officers for Transport in Scotland (SCOTS) produced the National Roads Development Guide⁹ in 2015, intended to "support the Scottish Government Policy Designing Streets and expand this to address the interface with other roads." It affirms the transport hierarchy with pedestrians at the top. It also contains many references to consideration for the needs of disabled people as active travellers, drivers and passengers. This in turn refers to

⁵ <https://www.gov.scot/binaries/content/documents/govscot/publications/corporate-report/2010/03/designing-streets-policy-statement-scotland/documents/0096540-pdf/0096540-pdf/govscot%3Adocument/0096540.pdf>

⁶ <https://www.legislation.gov.uk/ukpga/2005/13/contents>

⁷ <https://www.transport.gov.scot/media/30228/j256264.pdf>

⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/341513/pdfmanforstreets.pdf

⁹ <http://www.scotsnet.org.uk/documents/national-roads-development-guide.pdf>



technical information on access for disabled people to the UK Government’s “Inclusive Mobility”¹⁰ document from 2005.

Going Further: Scotland’s Accessible Travel Framework¹¹ (2016) does not reference the PSED or other UK legislation, but references human rights commitments and the British Sign Language Act. It contains some references to active travel and to the importance of travel between transport hubs for disabled people’s access.

The Scottish Government’s Planning and Building Design Access Note 78¹² (2006) on Inclusive Design uses the legislation of the time (DDA and Disability Equality Schemes) to frame the responsibilities of public authorities. This includes inclusive design, and while this is largely about building design, it does reference whole-development streetscape design and renovation.

Some guidance on making streets inclusive and welcoming for older and disabled people has been produced by charities and other organisations.

The RNIB’s Street Charter Toolkit¹³ references the PSED and outlines the key accessibility issues for visually impaired people in accessing streets: inaccessible crossings, pavement clutter and the challenges of “shared space”.

¹⁰https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/3695/inclusive-mobility.pdf

¹¹<https://www.transport.gov.scot/media/20113/j448711.pdf>

¹² <https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2006/03/pan-78-planning-building-standards-advice-note-inclusive-design/documents/0023150-pdf/0023150-pdf/govscot%3Adocument/0023150.pdf>

¹³ <https://www.rnib.org.uk/sites/default/files/Street%20Charter%20%20%28Scotland%29small%20version.pdf>



Age UK’s “Age Friendly Places”¹⁴ guide includes reference to seating and access to public toilets as part of making public space age friendly, as well as “level pavements, adequate crossing times and street lighting”.

¹⁴ https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/active-communities/age_friendly_places_guide.pdf



Guidance on Equality Impact Assessment

Guidance on carrying out Equality Impact Assessments (EqIAs) similarly exists at both national and local level. The key guidance is from the Equality and Human Rights Commission². This emphasises the breadth of the obligations under the PSED and gives specific guidance on best practice in assessing impact.

Local authorities often combine assessment of equality impact with other impact assessment, typically under the Fairer Scotland Duty, which looks at economic deprivation. It also deals with economic and environmental impact, and in one case with impact for care experienced people and “isles-proofing”. Not all local authorities’ guidance on impact assessment is publicly available.



4 Local Authorities

We selected ten local authorities to look at more closely to get a broad view of the ways that different streets and place projects are assessed across Scotland. These were balanced to reflect urban, rural, island and mixed populations, as well as smaller and larger authorities and different areas of Scotland. Within each authority, we looked at their top-level place strategy documents: the current Local Plan, any LA-level design documents, as well as any available paperwork and guidance for EqIAs, and the most recent reporting on mainstreaming the equality duty. We also selected two individual streets, travel or place policies within each LA. This reflected different sizes and types of intervention, including policies related to street repairs and winter maintenance, large capital projects such as town centre renewal and new active travel infrastructure. The selection of these projects did not aim to be random or statistically representative, but to cover a range of project and authority types, timescales, and sizes. We were looking to draw out preliminary ideas about the factors affecting the use of EqIAs, and thus aimed for the broadest range of projects.

Note on terminology: for the purposes of this report, EqIA includes all impact assessments which include assessment under the PSED, whatever they are called by individual authorities, and whatever other factors they include in the assessment alongside those covered by the PSED. For the purposes of this report, we limited our review to publicly available documents: as noted above, assessment of equalities impact and mainstreaming should be “published”. However, this means that there may be documents which we were not able to assess, perhaps because they had not yet been published.



Equality Strategies and Mainstreaming

We looked at the most recent Equalities Mainstreaming report for each of the local authorities. Our aim was to see whether explicit commitments to inclusion of disabled and older people in streets and place planning, and/or to accessibility of street and place, were part of these whole-authority, extremely broad scope documents.

All ten of the LAs had a mainstreaming report dated within the last two years, and all tied these reports to their equality strategies, which set strategic aims for the authority across all their activities and across equalities strands. As with impact assessments, some authorities include monitoring of other factors alongside those covered by the PSED, again most commonly socio-economic factors under the Fairer Scotland duty, but in one case also the monitoring of opportunities and outcomes for care experienced people, and isles-proofing of policy and practice.

Four of the ten local authorities had no targets or reporting relating to streets, place or access. Three mentioned disabled people's involvement in planning consultations; another noted the key role of Access Panels in facilitating access to planning consultations. One target beginning this year (so not yet assessed against) specified "reduction and removal" of barriers to public space, but this, like most targets in these reports, did not have quantitative measures associated with it.

There was only one quantifiable target on disabled and older people's physical access: a target to reduce complaints from older and disabled people about footway access, which was assessed as having been achieved. Volume of complaints may reflect the expectations of (potential) footway users that they should have access, rather than the level of difficulties experienced, as users who don't expect and try to obtain access will not encounter problems. However, it is encouraging to see physical access, and specifically disabled people's access, placed alongside other key areas in target setting.

One authority also outlined the ways in which it supports the capacity of staff to complete integrated impact assessments. Another mentioned impact assessments as a key tool in monitoring the authority's meeting of its human rights obligations. However, impact assessment does not feature prominently in most reporting on mainstreaming and target setting.



Higher level equalities and mainstreaming progress documents often have a huge scope, including local authorities both as employers and as service providers. However, even in this breadth, issues of physical access seem underrepresented compared to some other areas of local authority activity. For example, 11% of Edinburgh City's expenditure is on roads, transport and planning, and 16.5% of Orkney's on development and infrastructure: these are budgets that have very significant equalities implications.

Equality Impact Assessment at Local Authority level

All the local authorities we reviewed had at least some publicly available EqIAs, and five also had guidance and/or documentation on creating EqIAs publicly available. We are confident that guidance exists for all the local authorities concerned, but the scope of this project allowed time to access publicly available documentation without resorting to information requests. A review of this guidance found that all guidance contained a summary of the duties under PSED, an emphasis on the applicability of EqIA to a range of areas of work, and procedural discussion of when and how to integrate EqIA into the process of creating policies. All guidance made it clear that responsibility for EqIAs lies with the person/people developing the policy itself. Four of the five documents also mentioned support available from equalities specialists within the authority, and some also linked to internal training and other resources.

The level of detail in these documents was hugely variable, with lengths ranging from a single page to 28 pages. All the guidance suggested a two-stage process. This involved a screening or rapid assessment stage to determine whether a policy required full impact assessment before proceeding to full assessment. This process was formalised for several authorities, with rapid/screening tools available, while others didn't specify a recording method for this stage of the process.

Taking the EHRC's Scottish guidance as best practice, most local authority guidance is relatively brief and does not point to more detailed guidance elsewhere. However, all the guidance specified that it is not adequate to state that a policy is positive for everyone without differentiation. Documents also clarified that the responsibility for EqIA lies with the same person who is responsible for the project/policy as a whole and laid out the procedure for publishing the EqIA.



It is interesting to note that, while equalities impact assessment is placed in the context of the PSED, the advice and templates for EqIA focus either very strongly or exclusively on the first duty, the duty to eliminate discrimination. They largely do not mention the second and third duties, to advance equality of opportunity and to foster good relations between communities. In the context of place, streets and travel, these duties would appear to have a wide and interesting range of applications.



Local placemaking and streets guidance

Only one of the local authorities that we looked at had broad streets/placemaking guidance aimed at localising the Designing Streets policy. This included a commitment that street design should:

- always prioritise improving conditions for pedestrians, especially for those with mobility impairments or other disabilities, for cyclists and for public transport users.

While this was the only full implementation document related to Designing Streets, all the local authorities we looked at referred to it in, for example, specifications for new developments or road management guidelines. Placemaking guides for new developments exist for most local authorities, and these generally refer to Designing Streets and include some mention of disabled people's needs, most often in terms of parking.

The EqIA with reference to placemaking guidance identified potential differential impacts for older, younger, and disabled people, in that better street surfaces would improve access.



Local Development Plans

Local Place Plans are defined within The Planning (Scotland) Act 2019 as: “a proposal as to the development or use of land. It may also identify land and buildings that the community body considers to be of particular significance to the local area.”

Every local authority we looked at had a local plan available covering the years 2020/21 including the statutory elements, and in most cases exploring travel and place strategy more generally. These plans place development in the context of local priorities, and it is there that the highest-level commitment to equalities and access might be found. We looked at the content of the plans for mention of equality or access, of inclusion of older and disabled people, or the impact of the plan on older and disabled people. This search revealed none of the plans had a strategic commitment explicitly to equality of physical access. Less specific and related commitments included “accessible public transport”, “welcoming communities” and the “reduction of social and economic inequalities”.

All but one LDP had a related EqIA, though in one case this was only available for the consultation on the Main Issues Report (the pre-planning and consultation stage) due to the timings of plan development. One EqIA considered equalities issues only in the context of the ability of different groups to have input to the process of producing the local development plan, rather than the impact of the plan itself.

The remaining eight EqIAs were between six and 23 pages long (including the assessment of equality impact and other factors). Two did not make any differentiation between protected groups, either saying that there was no differentiated impact, or stating an identical positive impact for all groups. Six mentioned different impacts for older people and disabled people; three mentioned race, all in the context of Gypsy/ Traveller provision. Meanwhile one mentioned pregnancy and maternity, but only in the context of parking provision.

In looking at the consultation carried out for the local plans themselves (rather than the EqIAs), all had been subject to extensive consultation. In many cases it was noted either in the plan itself or in the EqIA that the consultation had sought the views of equalities groups. In one case, specific workshops were carried out with older and younger people, and with Black, Asian and minority



ethnic women. There was no record of the rate of response from those groups, or of the outcomes of those workshops, in the public domain. There does seem to be some relationship between consultations being promoted more widely and EqlAs including more specific considerations of individual equalities groups.



Individual projects

We looked at two individual place, travel and streets projects or policies for each of the local authorities in the scope of this report. These included roads maintenance and winter clearing policies as well as infrastructure and regeneration projects.

16 of the 20 projects did not have a published EqlA – for two of those we found mention in Council meeting papers that they had been carried out, but they did not appear to have been made public. While there is a requirement to publish equality impact assessment in Scotland, this may not mean any pre-assessment screening or similar documentation is in the public domain. In the worst case a paper to a Council regeneration committee confirmed that it had not “undertaken the required equalities impact assessment” for a project that was subsequently passed despite this omission.

The four EqlAs we were able to access covered three local authority areas. One, for winter roads maintenance, simply noted that the policy would have a positive impact on all citizens. The remaining EqlAs all cite background research on modes of travel in different groups, including analysis by ethnicity, age and disability, and in two cases gender. All documents identified the potential for both positive and negative differential impacts on equalities groups. Identification of a projects potential negative impact was something of a hallmark of more rounded and researched EqlA. These recognised contested areas in place and street design in which the access needs of people with different impairments may be in conflict, with “shared space” being the classic example of this tension. Issues around prioritising active travel that may have knock-on effects for disabled people who depend on car travel also fall into this category.

One of these EqlAs was for a rapidly developed temporary infrastructure project, so it is perhaps understandable that it does not cite consultation. However, two other EqlAs cited consultation with specific groups, including a range of disabled people’s organisations and representative groups, older people’s and younger people’s groups, as well as others.

What is notable here is that non-EqlA documentation around these projects often makes extensive reference to access and inclusion issues and work with communities. For example, one town regeneration project delivered widened paths and drop kerb installation developed through



a process of public consultation, but there was no available EqIA recording the rationale and likely positive impact for protected groups. For this reason, it is not possible to know whether this project was inclusive of disabled people and designed around identified needs. A lack of consultation and engagement around positive measures (or failure to record) is a misstep in building relationships and officer level best practice. This can only make future engagement more difficult, especially if a proposal is more contentious.

Looking at the plans and other documentation for these projects, the most common reference to older and disabled people's needs is again "disabled parking", with some references also to priority for grit bin locations in winter maintenance plans.

As a general observation on the process of accessing EqIAs, they are not usually available as part of the "document bundle" created for a project, which would generally include environmental impact assessments and other assessments which are better integrated with planning processes. They are generally accessible through directories of EqIAs organised by date. This does, however, allow us to see the different numbers of EqIAs completed by different local authorities and in different areas of practice, which varies hugely and could be the subject of a report in itself. One local authority in this report published no EqIAs at all in 2017.



5 Conclusions

Law and policy at a national level about streets and place is inclusive of equalities and sets clear standards for physical access and inclusion, at least in relation to disabled and older people's needs. While there is room for a broader and better researched understanding of what constitutes equal access for people in other equalities groups, the national framework demonstrates an awareness that public space can be both a barrier and an enabler to equality.

While there is high quality and detailed equalities planning and target setting at local authority level, it is unusual for this to contain detailed or specific advice about streets and place. In addition, local authority level place planning and target setting does not often contain explicit equalities considerations. There is some recognition of the different needs of disabled people and, in some cases, older people, but this is somewhat limited, and generally considers only

EqlAs for place projects rarely exist (or at least not in the public domain), and where they exist, they vary hugely in detail and quality. Some present a nuanced and informed knowledge of the impact of place and travel on different groups. Meanwhile, others display a lack of understanding of the purpose of the impact assessment process. These examples also show a lack of appropriate analysis of the project's impact on different groups of people.

We believe it is likely some form of unpublished equalities impact may be contained in applications to third parties for funding, which should be positive for building equalities in at the very outset of a project, but does not add to the store of best practice or to transparency about the assessment process.

In addition, some of the most interesting and innovative projects had no published EqlA at all. This may be because they took place in a non-standard or partnership context rather than being part of



standard Council project planning. This means that opportunities to share best practice were often missed.

For example, the Streets for Everyone project in Perth and Kinross brought planners and engineers directly into contact with disabled streets users to explore the impacts of good and bad street design on their ability to use public space. This enabled professionals to understand disabled people's perspectives in practical detail. Conversely disabled people gained greater knowledge about how streets are managed. Both the Council and the Centre for Inclusive Living felt that a project led by a "neutral party" (in this case Living Streets Scotland) helped to bring them together on an equal footing and to build lasting trust that would improve practice for the future. However, the only reference to this project on the Perth and Kinross Council website is a mention in the annual performance report that it was nominated for a national award. We are only able to cite this example due to Living Streets Scotland's involvement and thus having access to information available elsewhere. It suggests there could be other positive 'ghost' examples of best practice not visible in councils or shared across council boundaries.

Similarly, the EqIA for Glasgow's South City Way is probably the best example we found of an assessment bringing in research and consultation along with professional expertise to look at issues across the breadth of equalities groups. Sadly, the EqIAs for later parts of the City Ways projects have not been completed to the same depth despite this process being established and many of the likely equalities impacts being similar. Again, some of the learning from this is that an example of good practice arose through partnership with a third sector organisation, in this case Sustrans, who were able to bring different resources and perspective to the project, but that this does not seem to have become embedded in future practice.

Overall, there is a "downward dilution" of good practice which tends to be stronger at a higher level and weaker the closer it comes to concrete implementation of street infrastructure. There is also a failure of what we might call "lateral learning" in equalities practice, where islands of good practice at street level have no lasting traction within local authority. Nor is the practice easily accessible to other local authorities. We speculate that officers are being given neither the time nor the incentive to record and reflect on equalities practice before sharing with peers. As pressure increases to rapidly change streets to promote active travel their danger of constantly reinventing the wheel on equalities practice. This also ensures that only poor practice that attracts criticism from disability organisations has any visibility in the public debate.



The principle that EqIAs are completed by the person in charge of the project is a strong way to embed equalities practice into projects rather than making it an afterthought or the concern of specialists who are not closely familiar with the project/policy being assessed. However, when the people charged with doing the assessment don't have a good understanding of its purpose and a focus on tackling exclusion and inequality, there are dangers of a paper exercise or one based on uninformed opinion where better practice is possible. Guidance exists both within and outside local authorities; however EqIAs often do not meet the standards set out in these resources. While some equalities strategies have targets for EqIA completion and available training, this does not tend to correlate with more rigorous equalities practice in streets and place practice. This indicates poor awareness/dissemination within both professional organisation and local corporate bodies. Similarly, the relative sparseness of discussion of place, streets and travel from an equalities perspective indicates that perhaps this lack of connection originates from both streets practitioners and equalities practitioners.

The differential impact of streets, place, and travel on disabled and older people is often captured solely as a physical accessibility issue. The impact on different groups (including those with protected characteristics defined in equalities legislation) is not always identified in the EqIA process. Consideration of how a person's identity and experience might affect how they use and move through public space is rarely considered in local authority practice. Nor is this strongly addressed in national policy and guidance. By contrast, one of Engender's eight key demands for a gender-equal post Covid recovery is "A Scotland where women have equal use of public space". Issues of Black and other people of colour's safety and interactions with the police are also relevant in discussions about equitable access to public spaces. In most of the plans, policies and projects we reviewed we have found no way of understanding any specific concerns of these groups, and whether these were shared with other sections of society.

Equality Impact Assessment is in some cases a great tool for clarifying and addressing issues of the differential impact of policies and projects. However, they lack value if they are deployed without the express purposes of identifying and addressing a wide range of needs. A good assessment should never yield a generic response in relation to profound changes in street design and management. This is especially true at a time of rapid change. The biggest issue surrounds process and staff looking for simple answers and avoiding messy discussions and compromises to meet multiple needs. The poor streets-level practice we found calls for a fundamental change in the values and priorities of people delivering transport policy and projects. All those charged with



carrying out an EqIA should be both confident in their ability to do a quality assessment and convinced of its value in their working context specifically.

The way forward for embedding equalities considerations into streets, place and planning practice must address the human factors as well as the physical ones. Awareness of the structural issues that underpin exclusion is also vital. We saw sufficient good examples that with the right support and encouragement, promoters of streets projects can get things right. There needs to be a better understanding of what success looks like. This means sharing best practice both within and between councils and organisations such transport consultancies.



6 Ways forward

It appears that practitioners in this area are in general not confident or knowledgeable about equalities. While it is important to bring these discussions to initial professional training for planners and roads engineers and to increase the diversity within those professions, there is also an immediate need to address the skills gap amongst people already practising in streets related professions.

- The role of continuing professional development should be examined both with professional bodies and with local authorities and consultancies as employers, alongside discussions with universities and others involved in initial training.
- We must continue to proactively encourage people from diverse backgrounds into street design and management. Many issues will be immediately more visible and talked about within a more diverse community.

There is a block to the effective dissemination of good practice both from national policy level to “street level” and from innovative individual projects laterally to other practitioners.

- There is a role for some work to bring together these examples of excellence and disseminate them to individual practitioners who might be resourced as “equality champions”, either within their local authority, consultancy or their profession.

It is also clear that the obligations of local authorities to complete and publish evidence of their compliance with the PSED are not being met in this area of practice. One potential point of intervention is with elected members of planning committees, who generally have the opportunity to approve or reject exactly the policies and plans that this report looked at.

- Training and information should be developed for councillors on planning committees to better understand the role of equalities in this area.



-
- All EqIAs should be held in a central and visible public place, either locally or nationally. The state of practice should be reviewed from time to time by a suitably qualified body e.g. the Equalities and Human Rights Commission.

Another structure which already exists and has a codified role is the Mobility and Access Committee for Scotland, whose expertise in disability and access could perhaps be brought to bear in local authorities with an extended, funded and enforceable role. Local Access Panels also have a current role in consultations on development and access within their local areas.

- The option of building MACS or local Access Panels into local authority scrutiny of place and transport projects, with appropriate funding, should be examined.

Some of the projects examined here point to the huge value of learning directly from affected communities in changing “hearts and minds” among practitioners, and in building trust and shared knowledge with communities.

- Local authorities should promote the use of practice tools such as street audits ahead of developing schemes, with a focus on capturing the diverse views of communities.

There is also, in general, a paucity of evidence and good practice focussing on how to implement and codify equalities practice in this area, particularly in areas beyond physical disability.

- Equalities groups should be resourced to work with local authorities and practitioner organisations to develop practical tools for equalities practice.



Appendix: Summary of local authority documents

	EqlA	Characteristics mentioned in EqlA	Mention of equalities elsewhere	Inclusive consultation?	Notes
Edinburgh: Local Development Plan	Yes	None	None	General consultation	High participation by older people in consultation
Royal Mile	No	-	-	Unclear	Measures could have both positive and negative impacts on access
Spaces for people	Yes	Disabled people, younger people	-	-	IIA is for all temporary measures, uses range of data
Mainstreaming PSED report	Significant mention of streets and place issues with respect to disabled and older people; focus on equalities in engagement in service development. Mention of Integrated Impact Assessment process and support. New framework 21-25 has no targets on access to public space.				

	EqIA	Characteristics mentioned in EqIA	Mention of equalities elsewhere	Inclusive consultation?	Notes
Glasgow: Local Development Plan	Yes	Disability, older people	-	-	
South City Way	Yes	All statutory groups	Yes, disability	Yes, disability groups	Very wide consideration of equalities
Roads maintenance plans	Yes	Disability, age, gender	Disabled parking	None	
Mainstreaming PSED report	Target 10.3 on reducing complaints about footway access by older/disabled people: progress made.				



	EqIA	Characteristics mentioned in EqIA	Mention of equalities elsewhere	Inclusive consultation?	Notes
Dundee City: Local Development Plan	Yes	All	Disabled parking; specialist housing	Older people, younger people, BME women	
Waterfront	No (masterplan pre-2010)	-	-	-	No equalities analysis available for any part of project – many recent parts.
Roads maintenance plans	No	-	Grit bin priority to sheltered housing	None	
Mainstreaming PSED report	Target on improving completion of EqIAs; mention in consultation on new targets of disabled people’s involvement in place project planning; new target on better access to places, events and transport				



	EqIA	Characteristics mentioned in EqIA	Mention of equalities elsewhere	Inclusive consultation?	Notes
Orkney: Local Development Plan	Yes	No impact identified	-	None	
Kirkwall Urban Design Framework	Not published but referred to	-	-	-	
Roads maintenance	No	-	-	-	
Mainstreaming PSED report	No relevant targets or reporting				



	EqIA	Characteristics mentioned in EqIA	Mention of equalities elsewhere	Inclusive consultation?	Notes
Argyll & Bute: Local Development Plan	Yes	Disability, age, ethnicity, pregnancy/ maternity	Disabled parking	General consultation	
Core Paths plan	None available	-	-	-	
Roads maintenance	No	-	-	-	
Mainstreaming PSED report	No streets/ place equality outcomes; some mention of youth involvement in community planning				



	EqIA	Characteristics mentioned in EqIA	Mention of equalities elsewhere	Inclusive consultation?	Notes
Highland: Local Development Plan	For main issues report	Age, disability, race, religion and belief	-	Promotion of consultation to protected groups	No EqIA for LDP itself *yet* - full EqIA for last LDP
Accessing Inverness	Yes	Gender, age disability	-	-	
Spaces for People	Mentioned, not available online	-	-	-	
Mainstreaming PSED report	No mention of streets/ place factors				



	EqIA	Characteristics mentioned in EqIA	Mention of equalities elsewhere	Inclusive consultation?	Notes
Borders: Local Development Plan	Yes	Age, disability, race	Disabled parking	Promoted to equalities groups	
Selkirk regeneration	No	-	-	-	Project “developed with local community”
Local access and transport strategy	No	-	5 disabled parking, 1 concessionary travel	-	
Mainstreaming PSED report	No mention of streets/ place factors, some mention of involvement of disabled people in community consultation				



	EqIA	Characteristics mentioned in EqIA	Mention of equalities elsewhere	Inclusive consultation?	Notes
North Lanarkshire: Local Development Plan	Yes, for access to the plan only	Age and disability	Principle of ease of movement for disabled people	Promoted to equalities groups	
Town visions	No	-	-	-	
Roads maintenance	No	-	-	-	
Mainstreaming PSED report	Disability Access Panel as key to engagement on planning				



	EqIA	Characteristics mentioned in EqIA	Mention of equalities elsewhere	Inclusive consultation?	Notes
Perth & Kinross: Local Development Plan	No (one for the scheme developing the LDP)	-	Disabled parking in placemaking guide	None	
Placecheck Alyth	No	-	Specific access measures throughout	-	Project developed by local communities
Streets for Everyone	No	-	Project developed with/by disabled people	Partnership with Centre for Inclusive Living	
Mainstreaming PSED report	Specific aim on disabled people’s access to public space (for 2021-25, not yet assessed against)				



	EqIA	Characteristics mentioned in EqIA	Mention of equalities elsewhere	Inclusive consultation?	Notes
Clackmannanshire: Local Development Plan	Yes	Age, race, disability	Access to shops	-	
Alva regeneration	No	-	-	-	Report to place committee notes that it has not done the required EqIA
Spaces for People	No	-	-	-	
Mainstreaming PSED report	No aims or targets relating to physical access; no mention in report.				



Acknowledgements

Many thanks to David Hunter of Not for Profit Planning for his consultancy work on this report.

Our reference group of experts in disability, age, planning and streets provided invaluable guidance in shaping our recommendations.

This work was supported by a grant from Transport Scotland



**TRANSPORT
SCOTLAND**
CÒMHDHAIL ALBA

We are Living Streets, the charity for everyday walking. Our mission is to achieve a better walking environment and inspire people to walk more.

Thorn House, 5 Rose Street, Edinburgh, EH2 2PR

T: 0131 243 2645 www.livingstreets.org.uk @livingstreets

Living Streets (The Pedestrians' Association) is a Registered Charity No. 1108448 (England and Wales) and SC039808 (Scotland). Company Limited by Guarantee (England & Wales), Company Registration No. 5368409. 2 America Square, London EC3N 2LU.