

Report to:	Executive Cabinet Member Highways and Transportation		
Date of meeting:			
Report of:	Director of Place Services	Report Number:	41072
Reporting Officer:	John Kelly Assistant Director Highways & Engineering	Telephone Number:	07788 568374
Contact Officer:	Graham Langley Strategic Transport Manager	Telephone Number:	07990 792923
Report title:	Chorley New Road Emergency Active Travel Scheme		
<b>Not confidential</b>			
This report does not contain information which warrants its consideration in the absence of the press or members of the public.			
Purpose:	To report the findings of the Chorley New Road Emergency Active Travel Fund Consultation.		
Recommendations:	The Executive Cabinet Member is recommended to: <ul style="list-style-type: none"><li>• Note the background and context of both National and City Regional Strategy, Policy and Guidance on Active Travel and Active Travel Funding.</li><li>• Note the outcome of the Chorley New Road consultation in the context of guidance associated with Active Travel Funding.</li><li>• Confirm a decision to either: -<ul style="list-style-type: none"><li>○ Implement the scheme in full taking account of the consultation findings and proposed mitigation measures</li><li>○ Permanently remove some elements of scheme noting potential issues around legal challenge and clawback</li></ul></li><li>• Provide direction on how to deal with other similar EATF and ATF schemes in the future.</li></ul>		
Decision:			

<b>Background documents:</b>	<p>Greater Manchester 2040 Transport Strategy and Delivery Plan including the sub document the Bolton Local Implementation Plan.</p> <p>Working Together to Promote Active Travel – Public Health England</p> <p>The Rt Hon Grant Shapps MP – New Measures to Keep Passengers Safe Now and Level Up for the Future – 23 May 2020</p> <p>Traffic Management Act 2004 – Network Management in Response to Covid 19</p> <p>Made to Move – Greater Manchester 15 Step Plan to Transform How We Get Around</p> <p>Change a Region to Change a Nation – Greater Manchester Walking and Cycling Investment Plan – Jan 2020</p> <p>Gear Change – A Bold Vision for Cycling and Walking – 27 July 2020</p> <p>LTN1/20 – Cycle Infrastructure Design Guide – 27 July 2020</p> <p>Greater Manchester Interim Active Travel Design Guide – March 2021</p> <p>Greater Manchester Active Travel Consultation Plan – 11 December 2020</p> <p>DfT – Active Travel Fund – Expressions of Interest – 14 June 2021</p> <p>Aecom – Emergency Active Travel Fund Chorley New Road Consultation Report July 2021</p>	
<b>Signed:</b>	Leader/Executive Cabinet Member	Monitoring Officer
<b>Date:</b>		

<b>Consultation with other officers</b>				
Finance	Yes	22/07/2021	David Shepherd	
Legal	Yes	Insert date	Sarah Orrell	
HR	No	Insert date	Insert name	
Procurement	No	Insert date	Insert name	
Climate Change	Yes	Insert date	Insert name	
Equality Impact Assessment	Yes	22/07/21	Lisa Corbett	
<b>Post consultation reports</b> Please confirm that the consultation response has been taken into consideration in making the recommendations.			Yes	
<b>Vision outcomes</b> Please identify the appropriate Vision outcome(s) that this report relates or contributes to by putting a cross in the relevant box.			1. Start Well	X
			2. Live Well	X
			3. Age Well	X
			4. Prosperous	

	5. Clean and Green	X
	6. Strong and Distinctive	X

DRAFT

## 1. **INTRODUCTION & BACKGROUND**

- 1.1. In response to the Covid Pandemic the Transport Secretary the Rt Hon Grant Shapps MP announced an overall £2billion Active Travel Fund package to put cycling and walking at the heart of transport policy nationally and to ensure as we move out of the pandemic we Build Back Better and not return to the Status Quo. The first tranche of this commitment was to make £250million available for Emergency schemes to be delivered at pace to make cycling and walking safer. This was supported by immediate changes to statutory guidance to enable Local Highway Authorities to deliver trial schemes with consultation to follow. The emphasis of the funding was for road space reallocation and where possible for measures to become permanent after the trial period, capturing reduced levels of vehicle traffic from the pandemic and supporting the Government's commitment to Climate Change, Carbon Reduction, Air Quality and the nation's Health. This has been followed by a further Tranche where planned schemes could be consulted on prior to building a business case. In Bolton this included the Bolton Town Centre to Salford boundary (two schemes) and A58 Ring Road proposals that have all been consulted on now. A third Tranche has now been submitted by GMCA, there are no proposed schemes in this for Bolton.
- 1.2. As part of a Greater Manchester Campaign, Bolton carried out a Safe Streets Saves Lives Consultation on the Bolton Commonplace on-line consultation platform. Over 700 responses were received identifying locations across the borough where improvements were suggested to make walking and cycling safer and to enable social distancing. The Chorley New Road corridor received the most comments citing vehicle speed; space for cycling; protected cycle lanes; and improved crossing points. Based on these consultation results the Council submitted bids to the EATF for Chorley New Road and the A6 corridor, both schemes secured funding.
- 1.3. Implementation on the Chorley New Road scheme started in September 2020 with the removal of the previous substandard advisory cycle lane and subsequent maintenance and patching work. Once the new layout and wand orcas started to be installed, Members raised a number of complaints requesting changes to the scheme with Officers. Issues were responded to throughout the implementation period and some amendments were made. The scheme was halted completely at the request of Members in March 2021 with a further request to complete a consultation exercise before full implementation was completed.
- 1.4. Active travel is now at the heart of national policy and guidance through the publication of Gear Change – A Bold Vision for Cycling and Walking that proposes to make England a great walking and cycling nation. The strategy requires action taken at all levels of government to make our streets better for walking and cycling; placing walking and cycling at the heart of our decision-making process; empowering and encouraging Local Authorities; and enabling people to cycle and protecting them when they choose to do so. The strategy is supported by the publication of Local Transport Note LTN1/20 that identifies how our streets should be designed to enable safe walking and cycling.
- 1.5. Greater Manchester Authorities approved the Made to Move Action Plan in 2019 that proposed a 15-step approach to change travel behaviour and how we get around. This was followed up by the Change a Region to Change a Nation – a Greater Manchester Walking and Cycling Investment Plan that focused on the delivery of targets set in the Greater Manchester 2040 Transport Strategy to increase sustainable journeys by 50%. The 2040 Transport Strategy looks to create an additional 1 million more sustainable journeys every day, the majority of which will be made by walking and cycling. The economic benefits of these new trips, largely through improvements in health, is forecast to be £6 billion.

- 1.6. Bolton Council has declared a Climate Emergency and set an ambitious target to be net Zero carbon emissions by 2030. A report from the National Climate Change Committee noted that transport has been the highest emitting sector in the UK since 2015. Emissions have been broadly flat over the past decade, falling only 1% between 2009 and 2019. Improvements to the efficiency of cars have been lost to a trend towards both driving larger vehicles and driving more miles. Whilst electric vehicles are part of the solution, more journeys need to be made by active and sustainable travel to achieve carbon reduction targets and change the trend of further congested highway networks in the future. The Council has approved the Greater Manchester Clean Air Plan which identifies the single biggest thing we can do to improve air quality is drive less or choosing to make more journeys on foot or by bike that will also improve your health. The Councils emerging Climate Change Strategy also focuses on active travel being a fundamental part of our approach to achieving net zero carbon emissions by 2030.
- 1.7. With the second and third round of Active Travel Funding the Government through letters to City Regions and Local Transport Authorities provided guidance on consultation. A clear message is that a consultation should not give any one group or party a veto on the scheme, the consultation does not require consensus and should not focus on the loudest voices. A consultation should focus on issues raised to see how these can be mitigated to make an acceptable scheme.
- 1.8. At a special Cabinet Briefing on the 9<sup>th</sup> March after legal advice, a two-week consultation was agreed. The consultation was held between Monday 22<sup>nd</sup> March to Sunday 4<sup>th</sup> April 2021 with a formal report back to the Executive Cabinet Member for Highways and Transport.

## 2. **ISSUES**

- 2.1. The main themes from the consultation are focused on safety; maintenance; pedestrian movement; and congestion.

### Safety

- 2.2. The main safety issues identified was associated with parking in the cycle lane and the requirement for cyclist to move out into the vehicle lane or onto the footpath to pass. This was identified by both cyclists and drivers as a safety issue with enforcement of parking identified as a mitigation measure. The speed of drivers was identified as an issue for both cycling and walking. In the context of the scheme there was a perception that speed was more of an issue in the section that has not had the wand orcas installed. Observations of traffic speeds within the section with wand orcas suggest a reduction in vehicle speeds with drivers showing more awareness and correspondence with the Police has suggested the potential to reduce the speed limit to 30mph where the scheme self-enforces a reduction in speed. The safety of drivers was identified associated with the narrower widths available to cars and the inability to swerve to avoid potholes. Concern was also expressed about the safety of right turn manoeuvres and pressure from drivers behind that could result in drivers taking more risks. Right turn manoeuvres are covered in more detail below. Concern was also expressed about the safety of the wand orcas themselves although these have been rigorously tested by the Department for Transport and approved for use on the highway.

### Maintenance

- 2.3. The maintenance of the cycle lane was also a concern, both in terms of its usability and its visual appearance from rubbish and debris accumulation. Other districts across Greater Manchester and the country use mini sweeper vehicles to keep lanes clear. To mitigate this issue a sweeping regime can be put in place funded initially by the ATF funding stream and longer term via a GM maintenance programme. The condition of the road surface was also a concern with drivers noting they are constrained to a narrower section of carriageway which will cause quicker deterioration. A

point to make is the scheme is intended to encourage short journeys to be made on foot and by cycle therefore reducing the number of cars and congestion and in turn reducing the maintenance burden. However, resurfacing of the carriageway will be covered by the Council's maintenance programme.

#### Pedestrians

- 2.4. There was a similar number of respondents who thought that the scheme implemented offer pedestrian benefits compared to those that felt it disbenefits pedestrians. Benefits included feeling safer through the physical segregation from traffic and runners using the protected cycle lane. Disbenefits included making it more difficult to cross the road with the cycle lane. It should be remembered that the cycle lane already existed and the scheme marginally increased the width of the lane and defined its presence through wand orcas. There was a clear message from the consultation that there is a lack of suitable crossing facilities along Chorley New Road especially when considering vehicle speed that could be considered as additional measures.

#### Congestion

- 2.5. Congestion was a concern in the consultation although observed queuing appeared to be no worse than pre covid conditions set against evidence that the number of vehicle journeys on our network is now 2% higher. Right turning vehicles were referenced the most for creating congestion and delay. Engineers have confirmed that the narrowest width of the road where there is a right turn pocket is 9metres. This enables 2 3metre running lanes and a 3metre right turn lane. These are adequate widths in accordance with national guidance Design Manual for Roads and Bridges, and Manual for Streets. Poor lane discipline is likely to be more responsible for congestion created by right turning vehicles.

#### Sentiment/Perception

- 2.6. Generally, the scheme has been poorly received with 68% dissatisfied with the scheme as implemented. This is a consequence of both a focused targeting of residents within the consultation area and a dissatisfaction with how the scheme has been left incomplete and compromised through its implementation. Local demographics identify that most of the respondents within the study area are affluent with higher levels of car ownership than the average for Bolton, Greater Manchester and the North West. Households with low car ownership are located at either end of the corridor within proximity to Bolton town centre and Horwich who are more likely to be reliant on active and sustainable travel along this corridor. In accordance with paragraph 1.7 above central government suggest that a consultation should not give any one group or party a veto on the scheme, but consider issues raised to see how these can be mitigated to make an acceptable scheme
- 2.7. There was a correlation between dissatisfaction and the use of wand orcas. The removal of the wand orcas would mean the scheme would no longer comply with the minimum standards set out in LTN1/20 or the Greater Manchester Interim Walking and Cycling Design Guide. The scheme would also fall short on complying with Active Travel Fund criteria for schemes to be compliant with national standards.

#### Legal Challenge

- 2.8. The consultation report by Aecom and a decision taken by the Executive Cabinet Member for Highways and Transport is likely to come under public scrutiny. Legal challenges have been registered with Kensington for the removal of a scheme before the trial was complete; and Shoreham, W Sussex judicial review for removal of a scheme without taking account of public sector equality duty. Legal challenges against EATF schemes implemented such as Lambeth's low traffic neighbourhoods have been rejected by the high court, ruling the Council had not neglected its public

sector equality duty and therefore the scheme should remain. Each of these challenges have played out in the national press.

### Clawback of Funding

- 2.9. As part of the Letters to City Regions and Local Highway Authorities the DfT has referred to the potential to clawback EATF and ATF funding where schemes have not been implemented as promoted or removed without reasoned justification. As part of its quarterly reporting, TfGM is required to note to DfT and changes to schemes or their removal. If the Executive Member is minded to make a decision to remove the scheme then this will need to be reported to DfT and could result in the clawback of funding allocated to Bolton. The cost of the Chorley New Road scheme is £274,562.63. There could be some offset if funding is clawed back by reusing the wand orcas on other schemes within the borough or selling them to other Greater Manchester Districts with the potential to realise around £100,000.

### 3. **Consultation**

- 3.1. Aecom Transport Consultants was commissioned to carry out a consultation exercise on behalf of the Council for the Chorley New Road EATF scheme in accordance with Cabinet requirements (Consultation Report attached in Appendix One). The consultation exercise was held between Monday 22<sup>nd</sup> March to Sunday 4<sup>th</sup> April 2021, a period of two weeks to gather feedback on the partially implemented scheme between Dobson Road and Beehive roundabout, excluding Beaumont Road junction. The scheme included bringing the previous cycle lane provision up to a compliant standard in accordance with LTN1/20 which included widening and extending the lane, and the installation of light segregation measures.
- 3.2. The scheme was implemented in accordance with DfT EATF funding criteria as referenced in paragraph 1.1 above, for the implementation of the scheme in full as a trial with consultation to follow. The consultation approach included the targeting of residents and business through the delivery of a flyer to every property within 200m of the scheme corridor; a dedicated website on Commonplace; virtual engagement with key stakeholders and interest groups; press release and social media campaigns including the erection of signs promoting the consultation along the route. Due to prevailing COVID-19 pandemic restrictions, stakeholder feedback was provided through virtual and digital methods. Feedback could be provided through the Commonplace engagement tool based upon specific locations on a map and/or through the completion of the Snap survey. Within the two weeks over 2,200 individuals visited the Commonplace site with 789 Snap survey responses completed which was mainly received from residents.

### Commonplace Map Response

- 3.3. From the Commonplace Map responses, overall there was a negative response to the scheme as implemented. Just under half (48%) of those that completed the Commonplace map stated they felt 'negative' towards the scheme. However, a review of comments found that responses which received the highest number of agreements were generally related to perceived gaps or shortfalls in the scheme, which could potentially be addressed through the completion of the scheme or mitigation to overcome concerns raised both in the short-term or longer-term.
- 3.4. The key mapping concerns identified with the scheme were 'traffic congestion' (43%), 'feeling unsafe as a cyclist' (35%) and 'speeding vehicles' (30%).

- 3.5. Common improvements suggested were to have 'permanent cycle separation' (43%), 'dedicated space for cycling' (38%) and 'cycle lanes extended' (36%). These improvements identify that there is an appetite for high quality infrastructure in the area.

#### Snap Survey Response

- 3.6. From the Snap survey, 789 responses were received. Over 70% of respondents said they lived here and over 90% of respondents identified their usual method of travel as the car.
- 3.7. In terms of safety 47% of respondents stated that the scheme had improved safety for people cycling, as opposed to 26% that consider the scheme has reduced safety for people cycling. However, issues identified included parking in the cycle lane forcing cyclists into the vehicle lane as a safety issue with the scheme.
- 3.8. Perceptions of the impact on pedestrian safety was split with 28% of respondents indicating an improvement for people travelling by foot and 26% considering conditions had been made worse.
- 3.9. 39% of respondents support the reallocation of road space to people cycling, which was the main rationale for the A673 Chorley New Road Scheme EATF scheme. However, 56% of respondents indicated that they oppose the reallocation of road space to people cycling on the A673 Chorley New Road.
- 3.10. Most respondents (66%) oppose the use of wand orcas, against 30% who support their use to help support more travel by active modes. The main reasons for opposing wand orcas were perceptions that they were 'dangerous', 'unsightly', as well as 'concerns over maintenance' relating to litter and debris gathering in the cycle lane, causing hazards to all users, by forcing people cycling to 'weave' in and out of the cycle lanes.
- 3.11. Reflecting a strong correlation with views on wand orcas and the reallocation of roadspace, as well as perceptions on the incomplete nature of the scheme, 68% of respondents are dissatisfied with the enhanced cycle lanes on the A673 Chorley New Road as implemented.

#### Key Stakeholder Response

- 3.12. Bolton Council project team engaged with key stakeholders: North West Ambulance Service (NWAS) who supported the principle of road space reallocation and light segregation and to date have had no issues responding to emergencies using Chorley New Road. Diamond and Arriva bus operators, identifying concerns over Central Government approach to rapid implementation and the potential for impact on bus services if networks became more congested.

#### Mitigation

- 3.13. The consultation has identified a series of short-term (e.g. enforcement of parking within the cycle lane, enhanced maintenance through regular sweeping) and longer-term improvements (more permanent segregation), which if implemented, would potentially improve general perceptions of the scheme. This could be supported by efforts to improve awareness of the rationale / benefits for the scheme and engagement activity to reach all parts of the population, particularly the target audience of less confident or novice cyclists in support of changing mode of travel for short journeys.

#### Summary of the Consultation

- 3.14. Whilst the consultation has identified a strong level of opposition to the principle of roadspace reallocation and the application of wand orcas along this section of the A673 corridor, the survey



provides an indication that cyclists are using the corridor more, as well as an increased perception of safety for cyclists. Due to contractual and technical issues no actual count data was available at the time of writing this report to confirm observed increases in activity.

#### 4. **OPTIONS**

4.1. The Executive Member for Highways and Transport may choose to: -

- Implement the scheme in full, taking account of the mitigation measures to deal with concerns raised in the consultation report by Aecom and monitor the scheme going forward.
- Remove the scheme with recognition of the potential for legal challenge and clawback.

#### 5. **IMPACTS AND IMPLICATIONS:**

##### 5.1 **Financial**

5.1.1 As noted in paragraph 2.9 the removal of the scheme may result in the DfT clawing back the funding allocated to Bolton. The cost of the Chorley New Road scheme is £274,562.63. There could be some offset in the claw back amount by re-using the wands on other schemes in the borough or selling them to other Greater Manchester Councils if possible. This would probably realise around £100,000. The cost of repayment of grant would be met from the existing highways capital programme and therefore reduce funds available for other projects. If a decision is challenged then there will also be legal costs to consider.

##### 5.2 **Legal**

5.2.1 As noted in paragraph 2.8 other schemes that have been removed prior to completion or the end of the trial period have received legal challenges. It is anticipated that the Aecom consultation report and decision taken by the Executive Cabinet Member for Highways and Transport will also be publicly scrutinised and a decision may be challenged.

##### 5.3 **Climate Change**

5.3.1 Active Travel is a key component of the Greater Manchester and Councils commitment to climate change and carbon reduction. Transport is a key contributor to the production of carbon emissions and therefore more journeys need to be made by active and sustainable travel to achieve carbon reduction targets and change the trend of further congested highway networks in the future. The 2040 Transport Strategy emphasises the importance of the provision of infrastructure to enable short journeys to be made on foot and by bicycle as a realistic alternative to the car as part of the Right Mix ambition for at least 50% of all journeys to be made by active travel and public transport by 2040.

#### 6. **EQUALITY IMPACT ASSESSMENT (EIA)**

6.1. Under the Equality Act 2010, the council has a general duty to have due regard to the need to:

1. **eliminate unlawful discrimination**, harassment, victimisation and any other conduct prohibited by the Act;
2. **advance equality of opportunity** between people who share a protected characteristic and people who do not share it; and

3. **foster good relations** between people who share a protected characteristic and people who do not share it.

- 6.2. Due to the nature of the proposals, it is possible that there could be some adverse impact for the following groups, Race, Disability, Sex/Gender, Age, Caring status, and Socio Economic status. This analysis is set out in more detail in the full EIA (attached).

## 7. **CONSULTATION**

- 7.1. No additional consultation is proposed.

## 8. **VISION 2030**

- 8.1. Start Well – support our children to have a more active life style and be able to travel to school actively.
- 8.2. Live Well – the scheme proposes to increase the physical activity of residents through active travel.
- 8.3. Age Well – the scheme can support GP prescribing of active travel to keep an aging population healthier.
- 8.4. Clean and Green – reduce the impact of transport on climate change and air quality through active transport.
- 8.5. Strong and Distinctive – improved pedestrian and cycle safety through place shaping to make the borough more accessible by non-car modes.

## 9. **CONSIDERATIONS**

Theme	Issues
Public Perception	Commitment to public sector agendas <ul style="list-style-type: none"><li>• Climate Change</li><li>• Carbon Reduction</li><li>• Air Quality</li><li>• Health</li></ul>
Reputational	Relationship with Central and Regional Governance <ul style="list-style-type: none"><li>• Build Back Better</li><li>• Use of Public Money</li><li>• Future Funding Relationship with DfT/ GMCA</li></ul>
Legal	Potential for Legal Challenge <ul style="list-style-type: none"><li>• National Media Coverage – Perception and Reputation</li><li>• Legal Costs</li></ul>
Financial	<ul style="list-style-type: none"><li>• Potential Clawback of funding - DfT</li><li>• Future funding relationship with DfT/ GMCA</li></ul>
Public Sector Equality Duty	Existing inequalities in terms of current journeys made, current use of active travel, and current physical activity levels relate to many equality characteristics. The scheme seeks to meet the needs of currently underrepresented groups in order to reduce these existing inequalities.

## 10. **RECOMMENDATIONS**

10.1. The Executive Cabinet Member is recommended to:

- Note the background and context of both National and City Regional Strategy, Policy and Guidance on Active Travel and Active Travel Funding.
- Note the outcome of the Chorley New Road consultation in the context of guidance associated with Active Travel Funding.
- Confirm a decision to either: -
  - Implement the scheme in full taking account of the consultation findings and proposed mitigation measures
  - Permanently remove some elements of scheme noting potential issues around legal challenge and clawback
- Provide direction on how to deal with other similar EATF and ATF schemes in the future.

## Equality Impact Assessment

<b>Title of report or proposal:</b>
Chorley New Road Emergency Active Travel Scheme

<b>Directorate:</b>	Directorate of Place Service
<b>Section:</b>	Highways and Engineering
<b>Date:</b>	19/07/21

Public sector bodies need to be able to evidence that they have given due regard to the impact and potential impact on all people with 'protected characteristics' in shaping policy, in delivering services, and in relation to their own employees.

Under the Equality Act 2010, the council has a general duty to have **due regard** to the need to:

4. **eliminate unlawful discrimination**, harassment, victimisation and any other conduct prohibited by the Act;
5. **advance equality of opportunity** between people who share a protected characteristic and people who do not share it; and
6. **foster good relations** between people who share a protected characteristic and people who do not share it.

By completing the following questions the three parts of the equality duty will be consciously considered as part of the decision-making process.

Details of the outcome of the Equality Impact Assessment must also be included in the main body of the report.

**1. Describe in summary the aims, objectives and purpose of the proposal, including desired outcomes.**

Schemes will involve a range of infrastructure changes to the built environment to provide facilities for more people to make more everyday journeys by active travel (e.g. walking, cycling). Switching journeys from private car to active travel is an important element of Bolton's Climate Strategy. Bolton Council has a responsibility for improving population health, increased physical activity through active travel and improved air quality from fewer short car journeys will contribute to this. Benefits are also expected to the local community through having more people out and about on the streets and visiting local businesses.

Individual schemes will include measures which may include the following: providing cycle tracks protected from motor traffic along main roads and through junctions, measures aimed at reduction of motor traffic volume and speed along particular roads or across wider areas, upgraded pedestrian and cycle crossings of busier roads, repurposing space previously used by moving or stored motor vehicles to provide enhanced space for active travel or facilities of community or environmental value such as benches, plants, cycle parking, informal gathering or play space.

This is an individual EIA for the Chorley New Road scheme, which should be read in conjunction with the overall active travel EIA

47% of Bolton residents' trips are no more than 2km (up to 25 mins walk) and 70% are no more than 5km (up to 20 mins cycle), making a large proportion of trips potentially within the range of active transport<sup>1</sup>. Census data shows that 28% of Bolton households have no access to a car or van; this ranges from 54% in Halliwell ward to 11% in Heaton and Lostock ward.<sup>2</sup>

**2. Is this a new policy / function / service or review of existing one?**

Review

**3. Who are the main stakeholders in relation to the proposal?**

- People who currently travel through or around the scheme area by active means for the whole or part of some or all of their journeys.
- People who could travel through or around the scheme area by active means for the whole or part of some or all of their journeys if improved infrastructure was available.
- People living or working in the immediate vicinity of the scheme area.
- Schools and Businesses within the vicinity of the corridor.
- People who currently make short motor vehicle journeys through or around the scheme area which may be made more difficult, or may be perceived to be made more difficult, by the scheme.
- Users of the corridor who provide a service such as the Emergency Services, Bus Operators and the Royal Mail.
- Ward Members elected for the area in question.
- Residents from protected groups.

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<sup>1</sup> TfGM (2020). GM Travel Diary Survey data 2017-2019. Bolton data.

<sup>2</sup> NOMIS (2011). KS404EW - Car or van availability. <https://www.nomisweb.co.uk> Accessed 15/4/21.

#### 4. In summary, what are the anticipated (positive or negative) impacts of the proposal?

- There are significant existing inequalities in terms of current journeys made, current use of active travel, and current physical activity levels which relate to many equality characteristics. The scheme particularly seeks to meet the needs of currently underrepresented groups in order to reduce these existing inequalities.
- People who use non-standard or adapted cycles such as some disabled people or people carrying children may use cycles which are larger or heavier than a standard 2-wheeled bicycle. The scheme will be accessible to all users of non-standard and adapted cycles, of appropriate dimensions in line with DfT guidance.
- Concerns around safety while walking and cycling were identified in the consultation. Research shows physical separation from traffic is a particularly important aspect of safety for women, older people, and people cycling with children or allowing children to cycle independently. Disabled people are also particularly concerned with improving safety while cycling.
- The scheme uses wand orcas in line with DfT guidance, which provides light separation from motor traffic. Physical separation from traffic will have a particularly positive effect on women, older people, people caring for children, and disabled people who find cycling without such infrastructure unattractive.
- The consultation raised concerns relating to parking in the cycle lanes and lack of separation at junctions. This will have a particularly negative effect on women, older people, people caring for children, and disabled people given their stronger concern over safety and should be addressed in a subsequent phase of development.
- There is a marked change in demographic between the east end of the route and particularly the centre of the route. The population at the east end of the route is more ethnically diverse, younger, more deprived and with lower levels of car ownership. These groups may particularly benefit from increased opportunities for active travel and tend to make shorter journeys which are more suited to active modes. People who currently make few active travel journeys may need more support from non-infrastructure projects to support uptake e.g. increasing access to equipment, confidence/ skills building, encouragement by similar others.
- Disabled people and older people are particularly likely to be physically inactive, which has negative health impacts. They may particularly benefit from opportunities for being physically active while travelling in their local area if such environments are accessible and attractive to them. They may require particular support or equipment to take up these opportunities; ATF 3 is looking at the provision of infrastructure to support social prescribing of active travel.
- Whilst the scheme is a physical measure this is supported by non-infrastructure initiatives to support people to get active through cycle training, buddying, group rides and walks etc.

#### 5. What, if any, cumulative impact could the proposal have?

This is an impact that appears when you consider services or activities together. A change or activity in one area may create an impact somewhere else

- Individual active travel schemes will combine to provide attractive active travel routes for more journeys around the borough.
- As more people travel actively it will make it safer for others to do so (safety in numbers effect<sup>3</sup>)
- Schemes improving infrastructure for walking and cycling will have most impact when combined with interventions to discourage short car journeys e.g. parking policies, road user charging, further gradual

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<sup>3</sup> Jacobsen PL. (2003). Safety in numbers: more walkers and bicyclists, safer walking and bicycling. Injury Prevention, 9, 205-209.  
<https://injuryprevention.bmj.com/content/9/3/205> Accessed 05/03/2021

reallocation of road space away from motor vehicles to lock in benefits, improvements to public transport provision

- Schemes improving infrastructure will have greatest impact when combined with non infrastructure projects to support uptake amongst those who face the greatest barriers, e.g. increasing access to equipment, confidence/ skills building, encouragement by similar others.

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**6. With regard to the stakeholders identified above and the diversity groups set out below:**

Consider:

- How to avoid, reduce or minimise negative impact (if you identify unlawful discrimination, including victimisation and harassment, you must stop the action and take advice immediately).
- How to **advance equality of opportunity**. This means considering the need to:
  - Remove or minimise disadvantages suffered by people with protected characteristics due to having that characteristic.
  - Take steps to meet the needs of people with protected characteristics that are different from people who do not have that characteristic
  - Encourage protected groups to participate in public life and in any other activity where participation is disproportionately low
- How to **foster good relations**. This means considering the need to:
  - Tackle prejudice; and
  - promote understanding between people who share a protected characteristic and others.

Protected characteristic	Differential/ Adverse impact	Can this be justified? Why?	Actions taken to remedy
	<p><b>If you are completing this form prior to consultation:</b> Is there any potential for (positive or negative) differential impact? Could this lead to adverse impact and if so what?</p> <p><b>If you are completing this form following consultation:</b> List any adverse impacts identified from data or engagement (Delete</p>	<p>Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group, or for any other reason? Please state why</p>	<p>Please detail what actions you will take to remedy any identified adverse impact i.e. actions to eliminate discrimination, advance equality of opportunity and foster good relations</p>



Protected characteristic	Differential/ Adverse impact	Can this be justified? Why?	Actions taken to remedy
	as appropriate)		
<b>Race</b> (this includes ethnic or national origins, colour or nationality, and caste, and includes refugees and migrants; and gypsies and travellers)	<p>People from Asian/ Asian British ethnic groups are more likely to live in a household which does not have a car or van than people from White British backgrounds.<sup>4</sup></p> <p>People living in households which do not own a car or van make more walking &amp; cycling trips per person year than people living in households which do own a car or van.<sup>5</sup></p>		<p>Improving facilities for active travel will be of immediate benefit to people who already make more journeys by this means.</p> <p>The population at the east end of the route closer to the town centre includes more people from Asian backgrounds who will be likely to particularly benefit from this scheme.</p>
	<p>People from White ethnic groups make a lower proportion of their journeys by walking (White: 27%; Asian 35%) and a larger proportion by driving (White 41%; Asian 31%), although the difference is smaller when considering journeys either as a driver or passenger (White 59%; Asian 53%).<sup>6</sup> There may be interactions between the locations where people live or differences in age profile.</p>		<p>People who currently make few active travel journeys may need more support from non-infrastructure projects to support uptake e.g. increasing access to equipment, confidence/ skills building, encouragement by similar others.</p> <p>The population away from the east end of the route is more predominantly White British who may make fewer journeys currently by active travel so require more</p>

<sup>4</sup> DfT (2020). Statistical data set: Travel by vehicle availability, income, ethnic group, household type, mobility status and NS-SEC. Adult personal car access and trip rates by ethnic group: England. <https://www.gov.uk/government/statistical-data-sets/nts07-car-ownership-and-access> Accessed 5/3/21

<sup>5</sup> DfT (2020). Statistical data set: Travel by vehicle availability, income, ethnic group, household type, mobility status and NS-SEC. Travel by personal car access, gender and main mode or mode: England. <https://www.gov.uk/government/statistical-data-sets/nts07-car-ownership-and-access> Accessed 5/3/21

<sup>6</sup> TfGM (2020). *GM Travel Diary Survey data 2017-2019*.

Protected characteristic	Differential/ Adverse impact	Can this be justified? Why?	Actions taken to remedy
			non-infrastructure support.
<b>Religion or belief</b> (this includes any religion with a clear structure and belief system. Belief means any religious or philosophical belief. The Act also covers lack of religion or belief)	None identified		
<b>Disability</b> (a person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities)	<p>Disabled people who are cycling may be unable to dismount from and wheel their cycle, manoeuvre their cycle while not riding it, or lift their cycle over obstacles<sup>7</sup>.</p> <p>Adapted or non-standard cycles used by some disabled people may be wider or longer than a typical two wheeled bicycle. Cycle routes and cycle parking must be capable of accommodating a range of cycles. DfT guidance<sup>8</sup> gives typical dimensions.</p>		At 2m the lane width is sufficient for use by adapted or non-standard cycles. No obstacles are placed on the route that would require dismounting.
	Disabled people make fewer trips per person overall & by walking/ cycling, or car/ van (driver/ passenger combined) than non-disabled people. Disabled people make a		No issues have been identified with the scheme's impact on the needs of disabled people's access by taxi/ minicab. The scheme should benefit disabled people's

<sup>7</sup> Wheels for Wellbeing (2020). Guide to Inclusive Cycling (4<sup>th</sup> Edition). [Campaigning for inclusive cycling, Wheels for Wellbeing](#) Accessed 14/4/21.

<sup>8</sup> DfT (2020). *Cycle infrastructure design (LTN 1/20)*. <https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120> Accessed 14/4/21.

Protected characteristic	Differential/ Adverse impact	Can this be justified? Why?	Actions taken to remedy
	larger proportion of their overall trips by taxi than non-disabled people, although still less than 5% of their overall trips. <sup>9</sup>		ability to participate in active travel.
	More disabled people think cycle safety should be improved (79% vs 77% non-disabled) <sup>10</sup>		<p>Light separation from traffic is provided by the wand orcas in line with DfT guidance<sup>11</sup>. Safety from motor traffic is an important element of overall safety. This will have a particularly positive impact on disabled people given their stronger concern over safety.</p> <p>Concerns regarding safety while walking &amp; cycling along the route were raised in the consultations.</p> <p>The consultation identified issues with vehicles parking in the cycle lanes &amp; lack of protection at junctions. This will have a particularly negative impact on disabled people, given their stronger concern over safety &amp; should be addressed in a subsequent phase of development.</p>

<sup>9</sup> DfT (2020). Statistical data set: Travel by vehicle availability, income, ethnic group, household type, mobility status and NS-SEC. Travel by disability status and main mode or stage mode: England. <https://www.gov.uk/government/statistical-data-sets/nts07-car-ownership-and-access> Accessed 5/3/21

<sup>10</sup> Sustrans (2019). *Bikelife: Greater Manchester*. <https://www.sustrans.org.uk/bike-life/bike-life-greater-manchester> Accessed 28/1/21

<sup>11</sup> DfT (2020). *Cycle infrastructure design (LTN 1/20)*. <https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120> Accessed 14/4/21.

Protected characteristic	Differential/ Adverse impact	Can this be justified? Why?	Actions taken to remedy
	<p>Disabled people are less likely to be physically active than non-disabled people. Physical activity gives many health benefits. (active to the guideline amount of at least 150 mins/ week: disabled people: 39%; non-disabled people: 62%. Active for less than 30 mins/ week: disabled people: 51%; non-disabled people: 27%).<sup>12</sup></p> <p>Across the country, people with a hearing impairment or a mobility impairment are most likely to be physically inactive and people with a mental health condition least likely to be physically inactive (active for less than 30 mins/ week: hearing impairment: 53%; mobility impairment: 51%; mental health: 34%).<sup>13</sup></p>		Disabled people are less likely to be physically active than non-disabled people so may particularly benefit from opportunities to be physically active while travelling in their local area if such environments are accessible & attractive to them.
<b>Sex / Gender</b>	Females make more shorter trips than males (Under 1km: females make 55% of trips of this distance; 1-2km females make 59%; 2-5km females make 54%. Above this distance males make a larger proportion of trips of this length). <sup>14</sup>		Improving facilities for active travel will be of greater benefit to people who make more journeys that could be made by active travel.

<sup>12</sup> Sport England (2020). Active lives Query builder. Bolton data 2019-20. [Active Lives | Results \(sportengland.org\)](#) Accessed 16/4/21.

<sup>13</sup> Sport England (2020). Active lives Query builder. England data 2019-20. [Active Lives | Results \(sportengland.org\)](#) Accessed 16/4/21.

<sup>14</sup> TfGM (2020). *GM Travel Diary Survey data for Bolton*

Protected characteristic	Differential/ Adverse impact	Can this be justified? Why?	Actions taken to remedy
	More men than women currently cycle at least once a week in GM (female 7% vs male 19%) <sup>15</sup> (female 6% vs male 14%) <sup>16</sup>		The scheme proposes cycle infrastructure that meet the latest design guidance. This is designed to be safe & attractive to a broad range of people, so will particularly benefit people who find cycling without such infrastructure unattractive.
	<p>A recent systematic review<sup>17</sup> identified that women reported stronger 'stated preferences' for more separation from motor traffic while cycling.</p> <p>More women think cycle safety should be improved (female 80% vs male 75%)<sup>15</sup></p>		<p>Light separation from traffic is provided by the wand orcas, in line with DfT guidance<sup>18</sup>. Safety from motor traffic is an important element of overall safety. This will have a particularly positive impact on women given their existing stronger preferences for separation &amp; stronger concern over safety.</p> <p>Concerns regarding safety while walking &amp; cycling along the route were raised in the consultations.</p>
	Women often report changing their behaviour or route choice to avoid certain		The route already has full street lighting, good sightlines & natural surveillance

<sup>15</sup> Sustrans (2019). *Bikelife: Greater Manchester*. <https://www.sustrans.org.uk/bike-life/bike-life-greater-manchester> Accessed 28/1/21

<sup>16</sup> TfGM (2020). *GM Travel Diary Survey data 2017-2019*.

<sup>17</sup> Aldred R, Elliot B, Woodcock J, Goodman A. (2017). *Cycling provision separated from motor traffic: a systematic review exploring whether stated preferences vary by gender and age*. Transport Reviews, 37(1), 29-55. <https://www.tandfonline.com/doi/full/10.1080/01441647.2016.1200156>

<sup>18</sup> DfT (2020). *Cycle infrastructure design (LTN 1/20)*. <https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120> Accessed 14/4/21.

Protected characteristic	Differential/ Adverse impact	Can this be justified? Why?	Actions taken to remedy
	streets or areas because of fears or experience of harassment or sexual harassment. Concerns about personal safety was one of the biggest deterrents to cycling and walking after dark in a study based in Glasgow <sup>19</sup> , although some concerns were also felt while travelling during the day. The same study included precautions women might take when travelling alone, such as choosing more populated routes, using well-lit areas or travelling with friends and family.		provided by fronting properties & other people in the area.
<b>Gender reassignment / Gender identity</b> (a person who's deeply felt and individual experience of gender may not correspond to the sex assigned to them at birth, they may or may not propose to, start or complete a process to change their gender. A person does not need to be under medical supervision to be protected )	None identified		
<b>Age</b> (people of all ages)	Older people, increasing from age 55+ are less likely to be physically active than younger people. Physical activity gives many health benefits. (age 55-64: 32% inactive ie <30 mins/ week, 57% active ie 150+ mins/ week;		Older people are less likely to be physically active than non-disabled people so may particularly benefit from opportunities to be physically active while travelling in their local area if such environments are accessible & attractive to them. Older

<sup>19</sup> Motherwell, S. (2018). "Are we nearly there yet?": Exploring gender and active travel. Sustrans.

Protected characteristic	Differential/ Adverse impact	Can this be justified? Why?	Actions taken to remedy
	age 65-74 38% inactive, 53% active; 75+: 42% inactive, 48% active.) <sup>20</sup>		people should be involved in design of schemes to maximise their ability to benefit from active travel.
	Older people, increasing from age 55+ are less likely to be physically active than younger people. Physical activity gives many health benefits. (age 55-64: 32% inactive ie <30 mins/ week, 57% active ie 150+ mins/ week; age 65-74 38% inactive, 53% active; 75+: 42% inactive, 48% active.) <sup>21</sup>		Older people are less likely to be physically active than non-disabled people so may particularly benefit from opportunities to be physically active while travelling in their local area if such environments are accessible & attractive to them.  The area to the west of the route has a higher proportion of the population aged 65+. <sup>22</sup>
	Younger people are more likely to have cycled at least once a week (Under 19 21%; 20-59 9%; 60+ 3%). Older people make a larger proportion of their journeys by car/ van as driver or passenger & a smaller proportion by walking (Under 19: 38% walk, 44% car/ van; 20-59: 28% walk, 58% car/ van; 60+ 22% walk, 65% car/ van). <sup>23</sup>		People who currently make few active travel journeys may need more support from non-infrastructure projects to support uptake e.g. increasing access to equipment, confidence/ skills building, encouragement by similar others. Such measures are available in support of the scheme.

<sup>20</sup> Sport England (2020). Active lives Query builder. Bolton data 2019-20 [Active Lives | Results \(sportengland.org\)](#) Accessed 16/4/21.

<sup>21</sup> Sport England (2020). Active lives Query builder. Bolton data 2019-20 [Active Lives | Results \(sportengland.org\)](#) Accessed 16/4/21.

<sup>22</sup> PHE (2021). Local Health profile. [Local Health - Data - PHE](#) Accessed 20/7/21.

<sup>23</sup> TfGM (2020). *GM Travel Diary Survey data 2017-2019*.

Protected characteristic	Differential/ Adverse impact	Can this be justified? Why?	Actions taken to remedy
			The area to the east of the route, closer to the town centre, has a higher proportion of the population aged under 25. <sup>24</sup>
	A recent systematic review <sup>25</sup> identified that older people reported stronger 'stated preferences' for more separation from motor traffic while cycling		<p>The scheme meets the latest design guidance, which includes separation from motor traffic. This will particularly benefit people who find cycling without such infrastructure unattractive.</p> <p>Concerns regarding safety while walking &amp; cycling along the route were raised in the consultations.</p>
<b>Sexual orientation</b> - people who are lesbian, gay and bisexual.	None identified		
<b>Marriage and civil partnership</b> (Only in relation to due regard to the need to eliminate discrimination)	None identified		

<sup>24</sup> PHE (2021). Local Health profile. [Local Health - Data - PHE](#) Accessed 20/7/21.

<sup>25</sup> Aldred R, Elliot B, Woodcock J, Goodman A. (2017). *Cycling provision separated from motor traffic: a systematic review exploring whether stated preferences vary by gender and age*. Transport Reviews, 37(1), 29-55. <https://www.tandfonline.com/doi/full/10.1080/01441647.2016.1200156>



Protected characteristic	Differential/ Adverse impact	Can this be justified? Why?	Actions taken to remedy
<b>Caring status</b> (including pregnancy & maternity)	<p>A recent systematic review<sup>26</sup> identified that adults cycling with children, or adults allowing children to cycle independently reported stronger 'stated preferences' for more separation from motor traffic while cycling</p> <p>These groups are already among those underrepresented among people who cycle in Greater Manchester.</p>		<p>The scheme meets the latest design guidance, which includes separation from motor traffic. This will particularly benefit people who find cycling without such infrastructure unattractive.</p> <p>Concerns regarding safety while walking &amp; cycling along the route were raised in the consultations.</p>
	<p>80% of trips accompanying a child to school were made by women, making up 11% of women's total trips, compared to 3% of men's. Average (median) distance was around 1km for both males &amp; females. Females were more likely to walk this journey (female: 49% escort education trips walked, 43% car/ van driver; male: 32% walked, 57% car/ van driver).<sup>27</sup></p>		<p>Improving facilities for active travel will be of immediate benefit to people who already make more journeys by this means.</p> <p>The consultation identified issues associated with school travel to Bolton School &amp; Cleavelands School. Both parking in the cycle lane at school drop off &amp; pick up, &amp; accessing the school for drop off &amp; pick up were identified as issues.</p> <p>Potential mitigation includes work with the schools enabling &amp; encouraging school</p>

<sup>26</sup> Aldred R, Elliot B, Woodcock J, Goodman A. (2017). *Cycling provision separated from motor traffic: a systematic review exploring whether stated preferences vary by gender and age*. Transport Reviews, 37(1), 29-55. <https://www.tandfonline.com/doi/full/10.1080/01441647.2016.1200156>

<sup>27</sup> TfGM (2020). *GM Travel Diary Survey data GM data*

Protected characteristic	Differential/ Adverse impact	Can this be justified? Why?	Actions taken to remedy
			travel to be made by walking, cycling, bus, for all or part of the journey & exploring opportunities for residual parking needs to be managed off the highway.
	A recent systematic review <sup>28</sup> identified that adults cycling with children, or adults allowing children to cycle independently reported stronger 'stated preferences' for more separation from motor traffic while cycling		The scheme meets the latest design guidance, which includes separation from motor traffic. This will particularly benefit people who find cycling without such infrastructure unattractive.
	Adapted or non-standard cycles used for carrying young children may be wider, longer, or heavier than a typical two wheeled bicycle. Cycle routes and cycle parking must be capable of accommodating a range of cycles. DfT guidance <sup>29</sup> gives typical dimensions.		At 2m the lane width is sufficient for use by adapted or non-standard cycles. No obstacles are placed on the route that would require dismounting.
	A recent systematic review <sup>30</sup> identified that adults cycling with children, or adults allowing children to cycle independently reported stronger 'stated preferences' for more separation from motor traffic while cycling		The scheme meets the latest design guidance, which includes separation from motor traffic. This will particularly benefit people who find cycling without such infrastructure unattractive.

<sup>28</sup> Aldred R, Elliot B, Woodcock J, Goodman A. (2017). *Cycling provision separated from motor traffic: a systematic review exploring whether stated preferences vary by gender and age*. Transport Reviews, 37(1), 29-55. <https://www.tandfonline.com/doi/full/10.1080/01441647.2016.1200156>

<sup>29</sup> DfT (2020). *Cycle infrastructure design (LTN 1/20)*. <https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120> Accessed 14/4/21.

<sup>30</sup> Aldred R, Elliot B, Woodcock J, Goodman A. (2017). *Cycling provision separated from motor traffic: a systematic review exploring whether stated preferences vary by gender and age*. Transport Reviews, 37(1), 29-55. <https://www.tandfonline.com/doi/full/10.1080/01441647.2016.1200156>

Protected characteristic	Differential/ Adverse impact	Can this be justified? Why?	Actions taken to remedy
	These groups are already among those underrepresented among people who cycle in Greater Manchester.		
<b>Socio-economic</b>	<p>People in households with lower incomes are more likely to not own a car/ van, while people in households with higher incomes are more likely to own 2 or more cars/ vans<sup>31</sup>.</p> <p>People living in households which do not own a car or van make more walking &amp; cycling trips per person per year than people living in households which do own a car or van.<sup>32</sup></p> <p>People living in households with higher incomes make more trips by car/ van (combined driver/ passenger) than people living in households with lower incomes<sup>33</sup></p>		<p>Improving facilities for active travel will be of immediate benefit to people who already make more journeys by this means.</p> <p>People who currently make few active travel journeys may need more support from non-infrastructure projects to support uptake e.g. increasing access to equipment, confidence/ skills building, encouragement by similar others.</p> <p>The area to the east of the route, nearer to Bolton town centre, has a particularly more deprived profile with lower car ownership who may particularly benefit from increased options for active travel.</p>
	Across the country, areas with higher concentrations of poorer households have the higher concentrations of traffic-related		Replacing short car journeys by active travel will improve air quality.

<sup>31</sup> DfT (2020). Statistical data set: Travel by vehicle availability, income, ethnic group, household type, mobility status and NS-SEC. Household car availability by household income quintile: England. <https://www.gov.uk/government/statistical-data-sets/nts07-car-ownership-and-access> Accessed 5/3/21

<sup>32</sup> DfT (2020). Statistical data set: Travel by vehicle availability, income, ethnic group, household type, mobility status and NS-SEC. Travel by personal car access, gender and main mode or mode: England. <https://www.gov.uk/government/statistical-data-sets/nts07-car-ownership-and-access> Accessed 5/3/21

<sup>33</sup> DfT (2020). Statistical data set: Travel by vehicle availability, income, ethnic group, household type, mobility status and NS-SEC. Household car availability by household income quintile: England. <https://www.gov.uk/government/statistical-data-sets/nts07-car-ownership-and-access> Accessed 5/3/21

Protected characteristic	Differential/ Adverse impact	Can this be justified? Why?	Actions taken to remedy
	<p>pollution, while emitting the least nitrogen oxides &amp; particulate matter.<sup>34</sup></p> <p>Many of Bolton's Air Quality Management Areas located near to where people live are located in the borough's more deprived areas.<sup>35</sup></p>		<p>Certain parts of the route are included in the GM Air Quality Management area, particularly around the major junctions.<sup>36</sup></p> <p>Although in the medium-longer term replacement of short car journeys would be expected to have a significant impact, in the short term air quality should be monitored to ensure it does not worsen</p>
Other comments or issues			

<sup>34</sup> Barnes H, Chatterton TJ, Longhurst WS. (2019). Emissions vs exposure: Increasing injustice from road traffic-related air pollution in the United Kingdom. *Transportation Research Part D: Transport and Environment*, 73, p56-66. <https://www.sciencedirect.com/science/article/pii/S1361920919300392> Accessed 15/4/21.

<sup>35</sup> GMCA (2021). *Mapping GM*. [GM Open Data Infrastructure Map | MappingGM](https://gmca.org.uk/open-data/infrastructure-map/) Accessed 15/4/21.

<sup>36</sup> GMCA (nd). *Mapping GM*. [https://mappinggm.org.uk/gmodin/?lyrs=aqmas\\_gm#os\\_maps\\_light/15/53.5790/-2.4739](https://mappinggm.org.uk/gmodin/?lyrs=aqmas_gm#os_maps_light/15/53.5790/-2.4739) Accessed 20/7/21.

**This EIA form and report has been checked and countersigned by the Directorate Equalities Officer before proceeding to Executive Cabinet Member(s)**

Please confirm the outcome of this EIA:

No major impact identified, therefore no major changes required – proceed	<input type="checkbox"/>
Adjustments to remove barriers / promote equality (mitigate impact) have been identified – proceed	<input type="checkbox"/>
Positive impact for one or more groups justified on the grounds of promoting equality - proceed	<input checked="" type="checkbox"/>
Continue despite having identified potential for adverse impact/missed opportunities for promoting equality – this requires a strong justification	<input type="checkbox"/>
The EIA identifies actual or potential unlawful discrimination - stop and rethink	<input type="checkbox"/>

**Report Officer**

Name: Graham Langley

Date: 19/07/21

**Directorate Equalities Lead Officer**

Name: Lisa Corbett

Date: 22/07/21