

# Integrated Impact Assessment - Equality Impact Assessment

## Local Transport Plan 5



Inclusive Growth

Sustainable Development and Strategy

**Author:** Local Transport Plan 5 Project Management Team, Luton Council

**Contact:** Deni Krevesic BSc (Hons), MSc, FCIHT, CTPP

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# Introduction

## Background

This Equality Impact Assessment relates to the fifth Luton Council Local Transport Plan. An Equality Impact Assessment is a process designed to ensure that a policy, project, or scheme does not unlawfully discriminate against any protected characteristic as defined by the Equality Act 2010. The Equality Impact Assessment identifies where protected characteristics are disproportionately impacted by a policy, project or scheme, and outlines measures to mitigate these impacts where practicable.

All Local Authorities are required by national government to produce a Local Transport Plan. The Transport Act 2000 introduced a statutory requirement for local transport authorities to produce a Local Transport Plan every five years and to keep it under review. This requirement was retained in the subsequent Transport Act 2008, which sets out the statutory framework for Local Transport Plans and policies.

The Act requires that Local Transport Plans contain policies in a strategy and implementation plans (the proposals for delivery of the policies contained in the strategy). The fifth Local Transport Plan builds on the work of Luton's fourth Local Transport Plan, published in 2021, and responds to the significant local and global changes that have occurred in the years since. The fifth Local Transport Plan presents a vision-led, long-term strategy for transport in Luton, along with the actions needed to deliver it.

As part of the development of an equitable and sustainable Local Transport Plan, an Integrated Impact Assessment has been developed, of which this Equality Impact Assessment is a component. The other assessments include an Environmental Impact Assessment and a Health Impact Assessment. Often, there are direct crossovers between equality and health. Further information on the implications of the Local Transport Plan on health is provided within the Local Transport Plan's Health Impact Assessment.

## Approach to the Equality Impact Assessment

This Equality Impact Assessment assesses the impact of the Local Transport Plan upon protected characteristic groups, disproportionate impacts are identified in Chapter 4. This Equality Impact Assessment has been assessed based on the assumption that the Local Transport Plan meets its goals and vision and delivers the associated Implementation Plan. These goals and vision are outlined below.

### Vision

The Local Transport Plan envisages:

*By 2040, Luton will have a sustainable transport network enabling inclusive growth, providing access and improving health and wellbeing for all. Connections to and from the town will link residents, workers and employers to key economic hubs within the region, London and nationally.*

## Health Impact Assessment (HIA)

The vision is underpinned by seven objectives, targeting improvements across all aspects of transport in Luton. The first five objectives focus on addressing thematic aspects of transport and related issues, while objectives 6 and 7 set a direction for Luton Council's ways of working to deliver the Local Transport Plan:

Table 1: Strategic outcomes for each LTP5 objective

Objective
<b>1:</b> Create safer, active and healthier places that are liveable and improve quality of life for everyone
<b>2:</b> Tackle inequalities through accessible, affordable, and reliable transport choices that sustainably connect people with the key services and opportunities they need
<b>3:</b> Increase sustainable transport choices for all and reduce car dependency
<b>4:</b> Enable inclusive growth through enhanced sustainable connectivity and access to economic opportunities
<b>5:</b> Drive rapid decarbonisation in the movement of people and goods in line with local and central government targets, embracing innovation and technology
<b>6:</b> Embrace diversity across Luton through meaningful collaboration on transport plans, policies, and schemes
<b>7:</b> Support the financial viability of services through continued partnership working with other public sector bodies and the private sector, including neighbouring authorities, operators and employers

The Equality Impact Assessment will consider equality impacts in relation to the first five objectives, as Objective Six and Seven are related to Luton Council's approach to achieving the outcomes of the first five objectives.

# Scoping

## Overview

A scoping assessment has been undertaken to identify whether the objectives could have disproportionate impact(s) on people with one or more protected characteristics. 'Disproportionate impact' means that people who share a protected characteristic may be significantly more affected by a change than other groups.

Protected characteristics are defined by the Equality Act 2010. The 'protection' refers to protection from discrimination. There are nine characteristics protected by the Equality Act:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race or ethnicity
- Religion or belief
- Sex
- Sexual orientation

A summary of scoping exercise is presented in Table 2.

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Table 2: Scoping exercise

Protected Characteristic	Disproportionate impact unlikely	Disproportionate impact likely	Commentary
Age - people in particular age groups (particularly over 65s and under 16s)		✓	There is likely to be a disproportionate impact which this Equality Impact Assessment will investigate. A person's experience with transport can be shaped by age and age-related health conditions.
Disability - people who have physical, sensory, intellectual, or mental health impairment(s)		✓	There is likely to be a disproportionate impact which this Equality Impact Assessment will investigate. A person's experience with transport can be shaped by certain impairments.
Pregnancy and maternity – those who are pregnant or caring for new-borns		✓	There is likely to be a disproportionate impact which this Equality Impact Assessment will investigate. A person's experience with transport can be shaped by pregnancy and parental care.
Gender reassignment - people who are intending to undergo, are undergoing, or have undergone a process or part of a process of gender reassignment		✓	There is likely to be a disproportionate impact which this Equality Impact Assessment will investigate. A person's experience with transport can be shaped by gender reassignment.
Marriage or civil partnership – people who are married or within civil partnerships	✓		People who are married or within civil partnerships are unlikely to be disproportionately impacted by the scheme.
Race - people of a particular race or ethnicity (including refugees, asylum seekers, migrants, gypsies and travellers)		✓	There is likely to be a disproportionate impact which this Equality Impact Assessment will investigate. A person's experience with transport can be shaped by ethnicity.
Religion or belief - people of particular faiths and beliefs		✓	There is likely to be a disproportionate impact that this Equality Impact Assessment will investigate. A person's experience with transport can be shaped by their beliefs.
Sex – whether people are male or female		✓	There is likely to be a disproportionate impact which this Equality Impact Assessment will investigate. A person's experience with transport can be shaped by their sex.
Sexual orientation – whether a person's sexual orientation is towards the same sex, a different sex, or both		✓	There is likely to be a disproportionate effect which this Equality Impact Assessment will investigate.

## Intersectionality

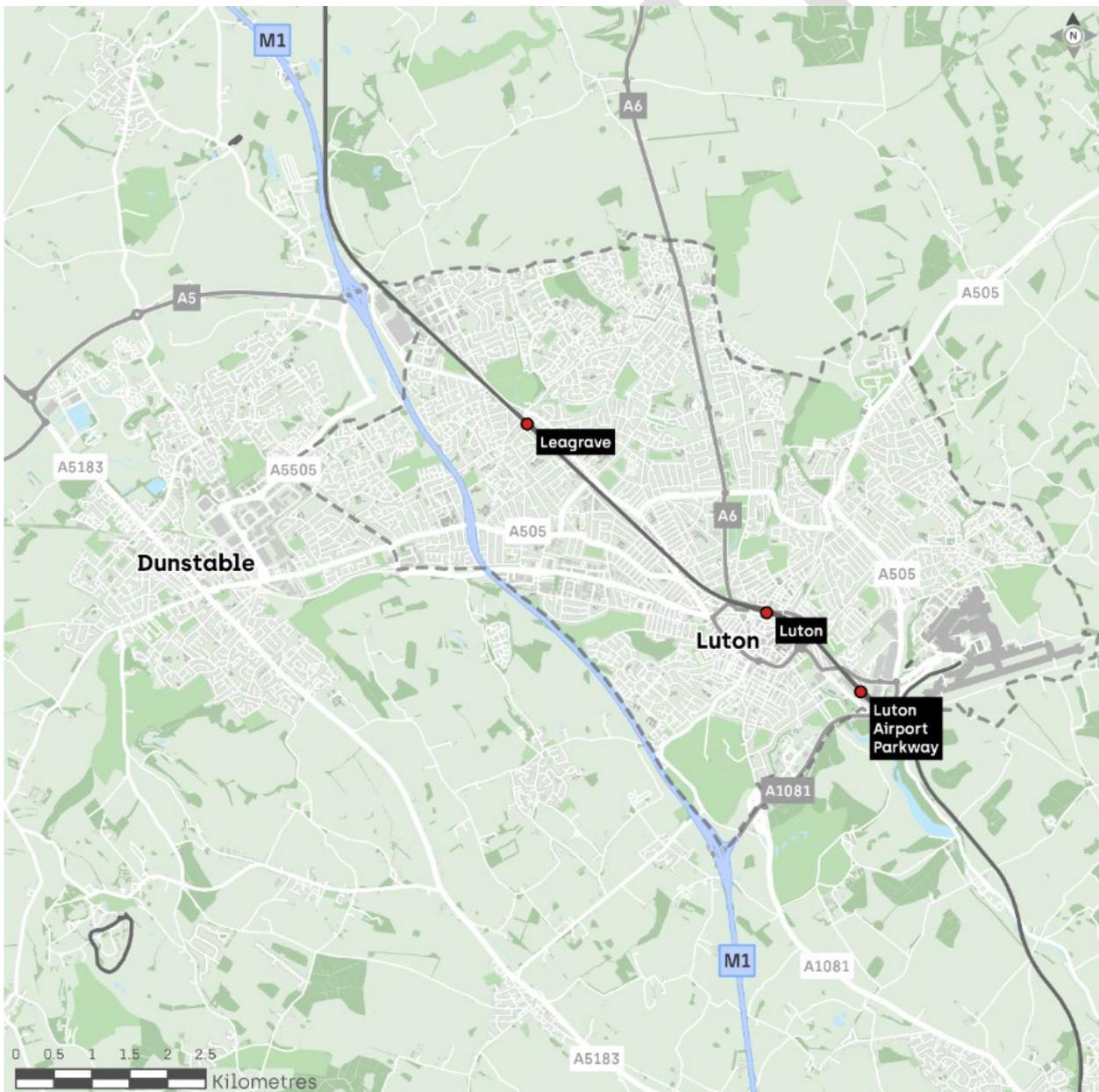
It is noted that protected characteristics are not mutually exclusive, and intersectionality between two or more protected characteristics is common. This means that individuals can be impacted in multiple ways that reflect the combination of their protected characteristics. For example, a disabled female could be impacted in regard to both disability and sex. Intersectionality can further compound the severity and/or disproportionate nature of certain impacts.

Given the large number of combinations of any and all protected characteristics possible, this Equality Impact Assessment does not individually set out impacts for a full list of combinations. However, where it is deemed relevant and of particular significance, intersectionality with particular characteristics is considered within the impact assessment.

## Study area

The population scope of this Equality Impact Assessment includes all residents within the Luton Borough Council boundary, which is outlined in Figure 1.

Figure 1: Geographical extent of HIA



# Baseline Evidence

## Data sources

For the purpose of this assessment, data and information has been gathered about protected characteristics for all Luton Census Output Areas alongside England as a whole and the East of England statistical region. The Census Output Areas that are included in Luton, as shown in Luton Borough Council's [Local Insight](#) website, provides a further up-to-date basis for the data explored in this section.

While Census data is a useful tool to understand and compare travel characteristics of an area with another, it does have limitations as following:

- The 2011 dataset is dated and does not reflect development and societal changes occurred over the 2010s.
- The 2021 dataset provides up-to-date demographic context but lacks accurate insight on travel patterns due to its undertaking on 21st March 2021, where a larger proportion of workers will have recorded working mostly or at home, compared to the date of which this Equality Impact Assessment was prepared.

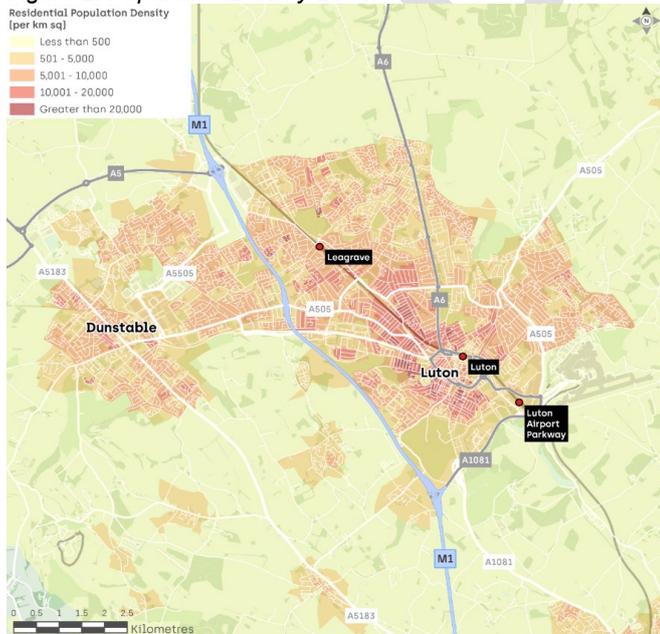
## Background

### Population size

Based on Office for National Statistics (ONS) 2023 mid-year population estimate, the population in Luton is approximately 231,000.<sup>1</sup> This was an increase of 2% on the previous year, with the overall population of Luton increasing 11% between the 2011 and 2021 census. The town covers an area of 43 square kilometres, with the population density of the area presented in Figure 2.

The most densely populated areas are the wards of Beech Hill and Bescot in the central area of Luton, and the overall area is the most densely populated outside of London.<sup>2</sup>

Figure 2: Population Density Luton

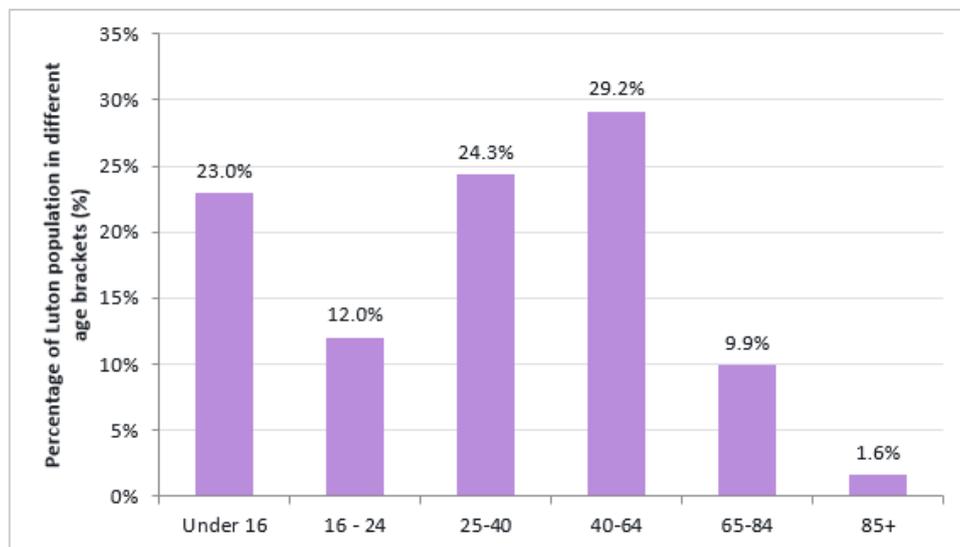


Source: Census 2021

<sup>1</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2>

Figure 3 shows that individuals between the age of 40 and 64 account for approximately 29.2% of the population of Luton, while over 85s account for 1.6%, both disproportionately lower than the England average.

Figure 3: Age distribution in Luton



Source: UK Census 2021 (ONS)

### Life expectancy

Life expectancy refers to the number of years an individual is forecasted to live at birth Table 3. shows that life expectancy in Luton is lower for both Male and Female residents than the national average. Men living in the most deprived areas of Luton can expect to live on average nine years less than those from the most affluent parts of the town, the life expectancy gap for women is slightly lower at five years.<sup>3</sup>

Table 3: Life expectancy in Luton compared to England 2020-2022

	Male	Female
Luton	77	81.3
England	78.9	82.8

Source: Fingertips, Public Health England

### Road safety

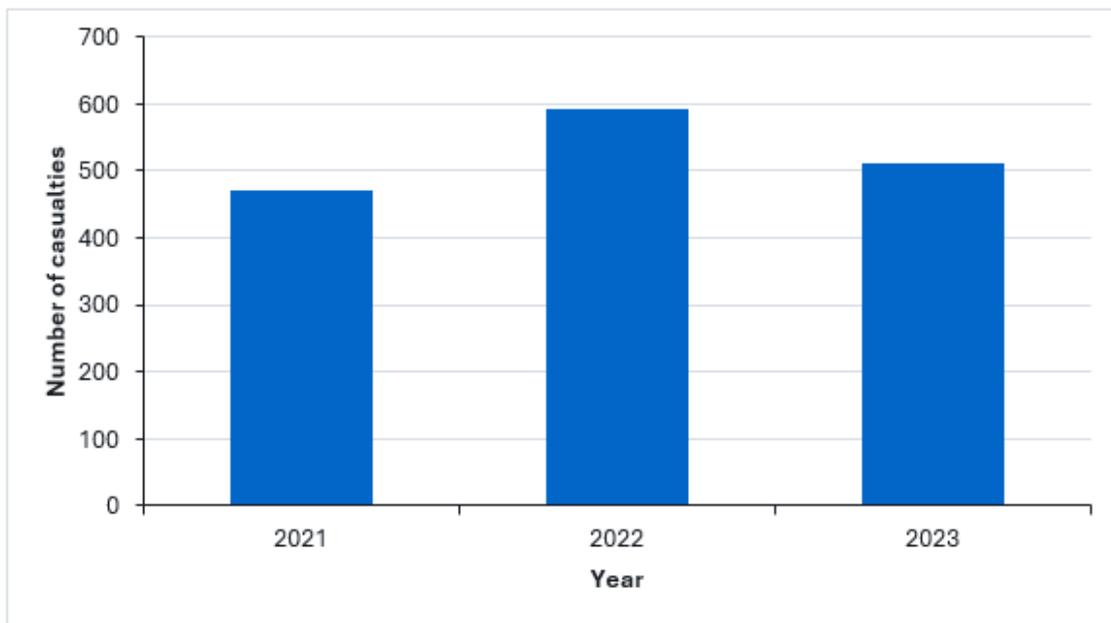
Overview and demography of collisions

<sup>3</sup>[https://www.luton.gov.uk/Community\\_and\\_living/Lists/LutonDocuments/PDF/observatory/jsna-this-is-Luton.pdf](https://www.luton.gov.uk/Community_and_living/Lists/LutonDocuments/PDF/observatory/jsna-this-is-Luton.pdf)

Figure 4 and subsequent figures in this section summarise STATS19 (the national road traffic accidents database) data collected between 2021 and 2023. It shows that casualties as a result of road accidents are increasing, from around 400 recorded in 2021 to almost 600 in 2022 and 500 in 2023. This likely reflects increased movement and economic activity following the Covid-19 pandemic.

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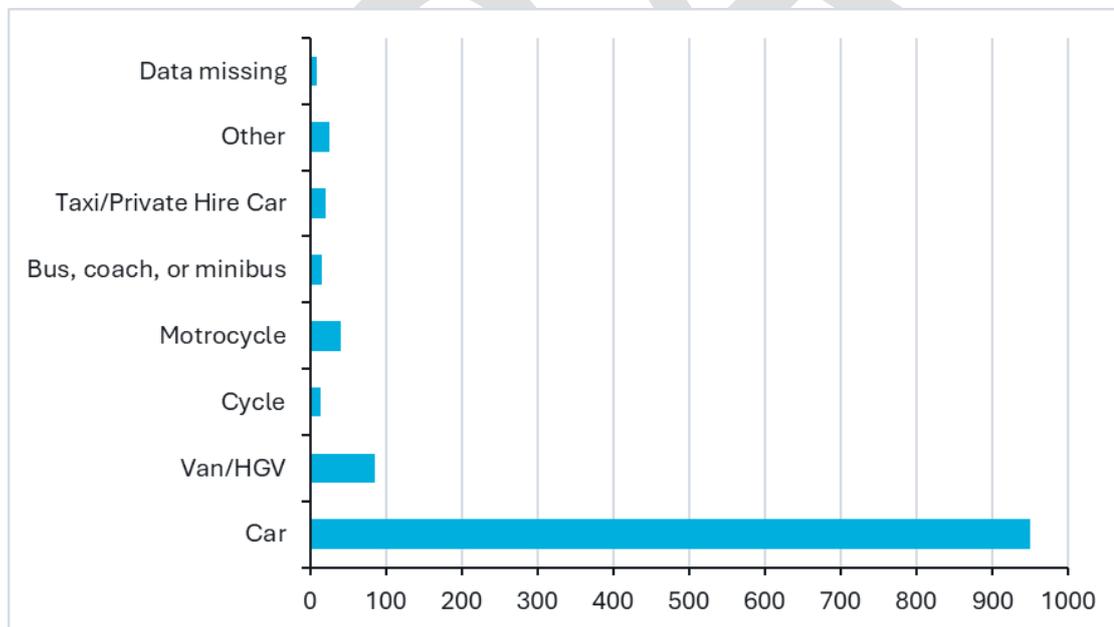
Figure 4: Casualties in Luton, 2021 – 2023



Source: STATS19 Road Traffic Accident Database (Department for Transport)

Figure 5 shows the type of the vehicle(s) involved in each road casualty. They predominantly involved cars, though a notable proportion involved a van/HGV or a motorcycle. It should also be noted that accidents involving motorcycles involve disproportionate risk of serious injury to the driver due to their lack of protection, whilst accidents involving HGVs (i.e. lorries) in particular involve disproportionate risk of serious injury to pedestrians and other road users due to the size and weight of the vehicles.

Figure 5: Type of vehicle involved in casualties in Luton, 2021 – 2023

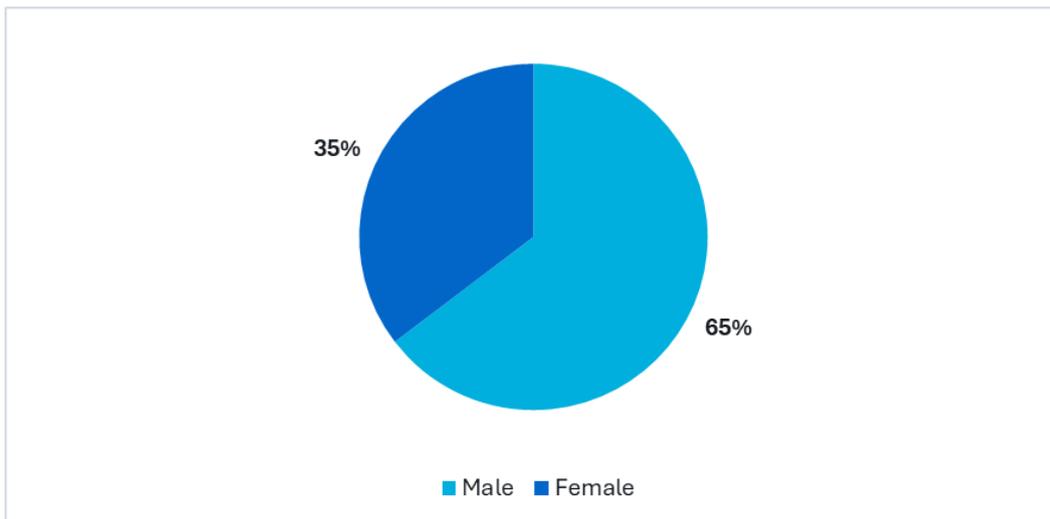


Source: STATS19 Road Traffic Accident Database (Department for Transport)

Figure 6 shows the breakdown in casualties by sex. Most people involved in road casualties in Luton are Male, at 65% compared with 35% being Female. This should be considered in terms of the impacts of transport policy and interventions on the 'Sex' protected characteristic.

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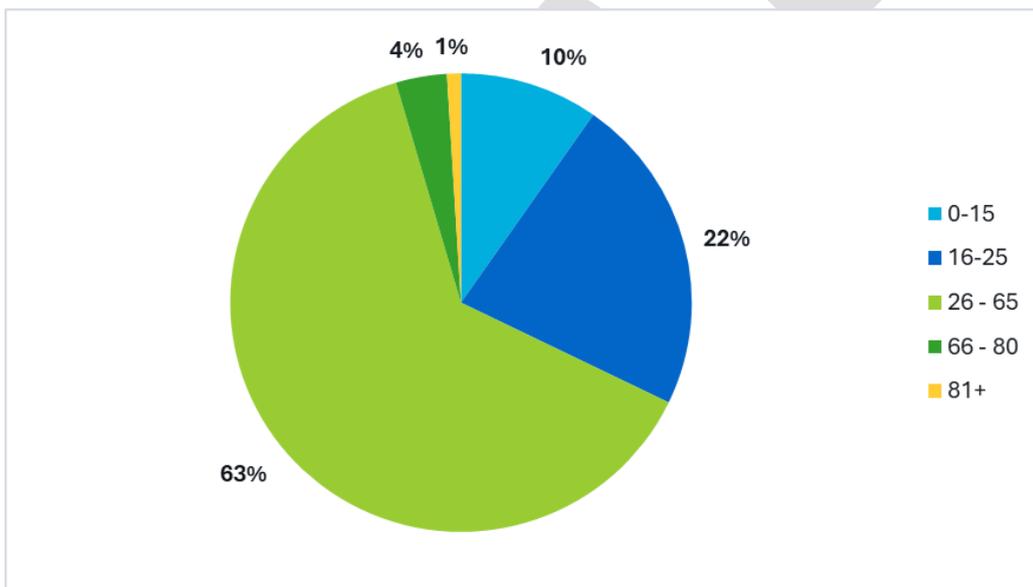
Figure 6: Sex of casualties in Luton, 2021 – 2023



Source: STATS19 Road Traffic Accident Database (Department for Transport)

Figure 7 shows the breakdown in casualties by age. 10% of casualties were aged 15 or under, and a further 22% were aged 16-25, reflecting the physical susceptibility of young people to injury in road accidents, issues around the safety of young drivers, as well as the socioeconomic bias that leads to higher road casualty rates amongst young people in more deprived areas<sup>4</sup>.

Figure 7: Age of casualties in Luton, 2021 – 2023



Source: STATS19 Road Traffic Accident Database (Department for Transport)

### Severity and spread of collisions

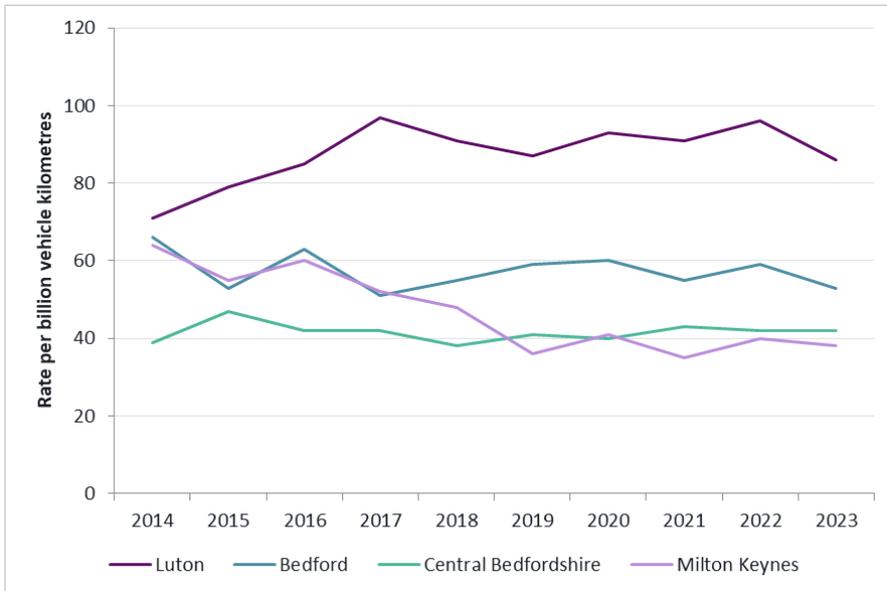
Road traffic collisions typically involve vehicles and other road users, often resulting in injury. In the context of health, collisions are an immediate risk to the safety of individuals.

Luton has a relatively higher rate of killed or seriously injured (KSI) road casualties than neighbouring local authorities, at around 90 KSI casualties per billion motor vehicle kilometres per year over the past decade, as shown on Figure 8. Bedford, Central Bedfordshire, and Milton Keynes all averaged in the 40-60 range over the same period. These rates remained steady throughout the Covid-19 pandemic, suggesting they may have structural and/or specific causes rather than being determined by general volumes of traffic.

Figure 8: Rate of killed or seriously injured casualties per billion motor vehicle kilometres (2014-2023)

<sup>4</sup>

[https://assets.publishing.service.gov.uk/media/5abb9f9e40f0b67d67479cb2/Reducing\\_unintentional\\_injuries\\_on\\_the\\_roads\\_among\\_children\\_and\\_young\\_people.pdf](https://assets.publishing.service.gov.uk/media/5abb9f9e40f0b67d67479cb2/Reducing_unintentional_injuries_on_the_roads_among_children_and_young_people.pdf)

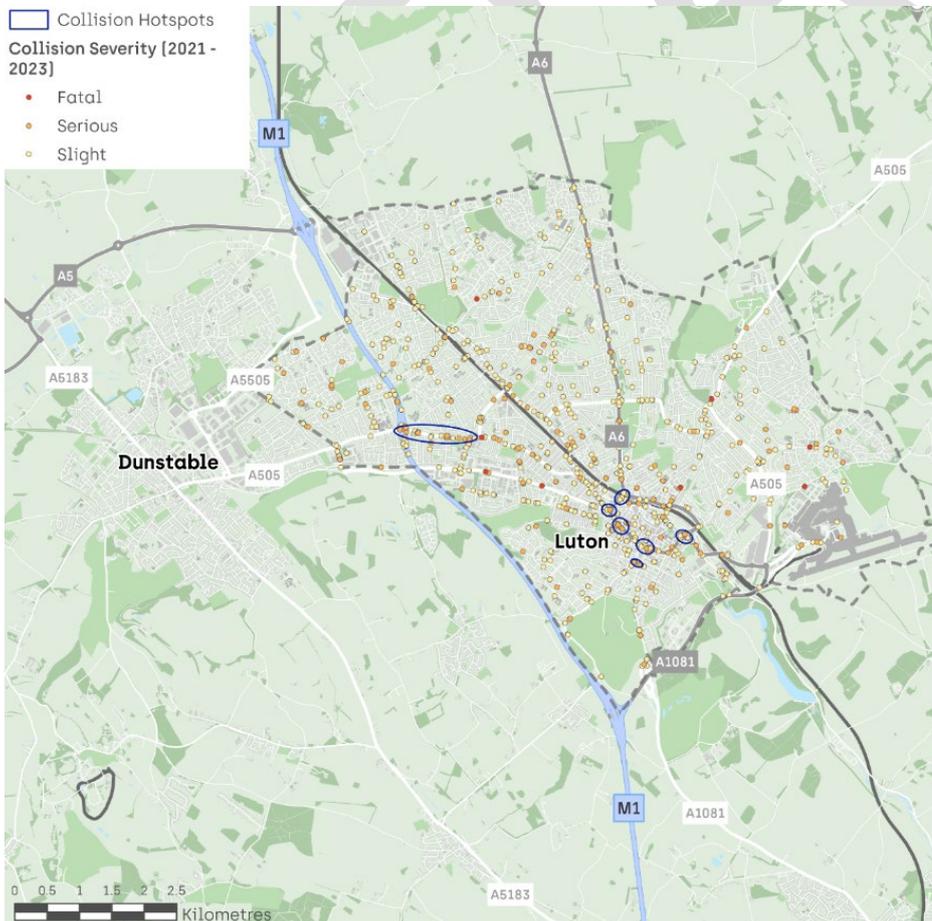


Source: Department for Transport (DfT) RAS0403

Figure 9 shows how road collisions involving casualties of all severities are distributed across Luton. This highlights particular road safety hotspots along the A505 in Luton town centre as well as the approach to the M1 junction in the west.

Implementation of measures such as reduced speed limits where appropriate, provision of new and improved pedestrian crossing points, and restrictions to through motor traffic is important to improving road safety. Providing high quality walking and cycling networks, protected from motor traffic, will also create safe and convenient options for people to move around Luton by active travel.

Figure 9: Map of road collisions in Luton by severity



Source: STATS19 Road Traffic Accidents Database (Department for Transport)

# Age

## Definition according to the Equality Act 2010

In relation to the protected characteristic of age:

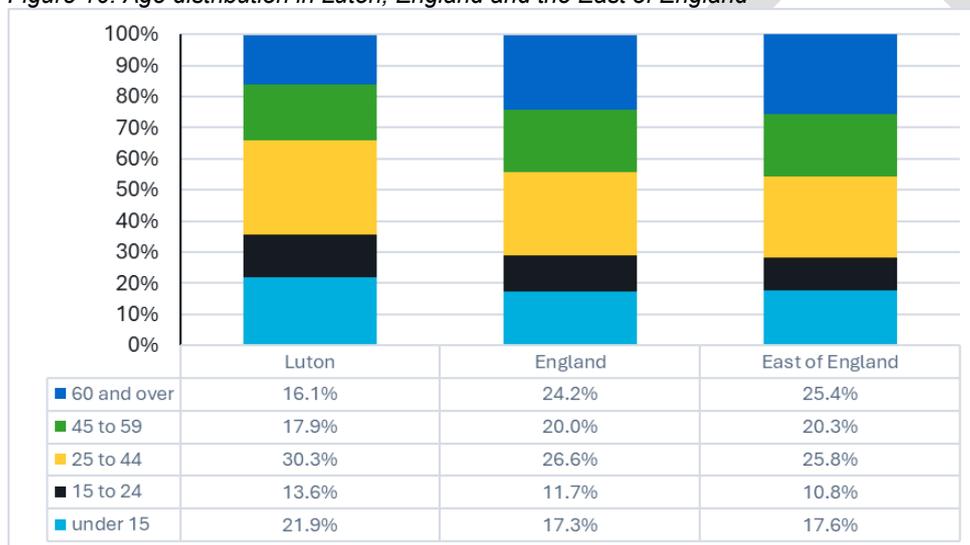
- a reference to a person of a particular age group, and
- a reference to persons who share a protected characteristic is a reference to persons of the same age group.

A reference to an age group is a reference to a group of persons defined by reference to age, whether by reference to a particular age or to a range of ages.

## Baseline equality data

Figure 10 shows the age distribution in Luton and across England and the East of England. The population aged under 15 and 15 to 24 is noticeably higher in Luton at a combined 35.5% compared with England (29.0%) and the East of England (28.4%). Luton also has a much smaller population aged 60 and over proportionally at 16.1% compared with across England (24.2%) and the East of England (25.4%).

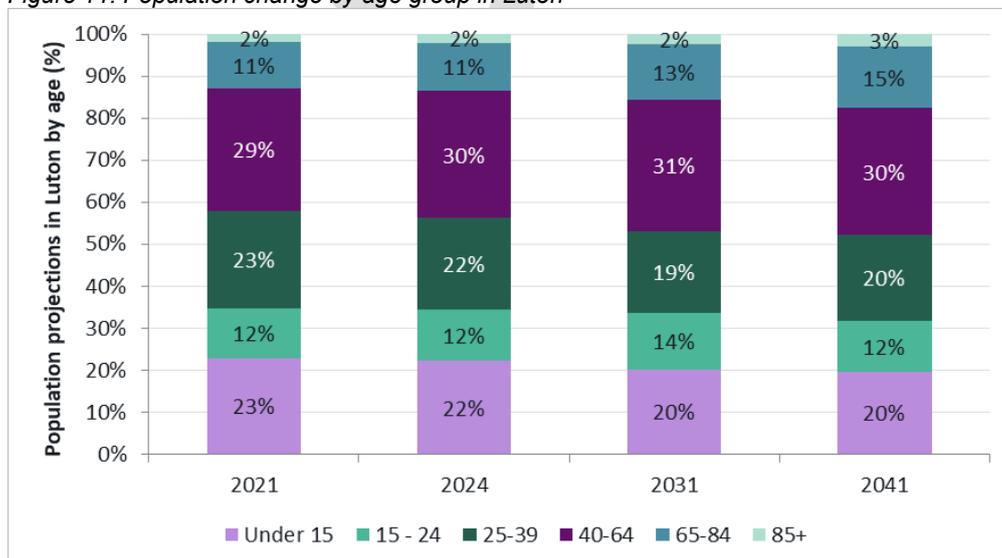
Figure 10: Age distribution in Luton, England and the East of England



Source: UK Census 2021 (ONS)

Figure 11 shows a growth in the proportion of older age groups is expected, with those aged over 40 expected to grow from 42% of the population to 48% of the population between 2021 and 2041.

Figure 11: Population change by age group in Luton



Source: ONS population projections for local authorities

# Disability

## Definition according to the Equality Act 2010

A person (P) has a disability if:

- P has a physical or mental impairment, and
- the impairment has a substantial and long-term adverse effect on P’s ability to carry out normal day-to-day activities.

A reference to a disabled person is a reference to a person who has a disability.

In relation to the protected characteristic of disability:

- a reference to a person who has a particular protected characteristic is a reference to a person who has a particular disability, and
- a reference to persons who share a protected characteristic is a reference to persons who have the same disability.

## Baseline equality data

Luton’s 86.3% of residents are not limited by a long-term health problem or disability. This is somewhat higher than for both England as a whole (82.7%) and the East of England (83.4%). 6.2% of residents in Luton said their day-to-day activities are limited a lot by a long-term health problem or disability, which while lower than the England average (7.3%) is roughly in line with the average for the East of England (6.6%), as shown on

Figure 12.

Figure 12: Population limited by a long-term health problem or impairment in Luton, England and the East of England



Source: UK Census 2021 (ONS)

Focusing on disabled cyclists, the Wheels for Wellbeing annual survey (2019/20)<sup>5</sup> showed that 65% of disabled cyclists use their bike as a mobility aid, and 64% found cycling easier than walking. Survey results also show that 31% of disabled cyclists’ bike for work or to commute to work and many found that cycling improves their mental and physical health.

Inaccessible cycle infrastructure was found to be the biggest barrier to cycling, followed by the prohibitive cost of adaptive cycles and the absence of legal recognition of the fact that cycles are mobility aids on par with wheelchairs and mobility scooters. These results are presented on a

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

national level, yet it should be noted that the data is based on a small samples and results should be taken as an indication only.

## Pregnancy and maternity

### Definition according to the Equality Act 2010

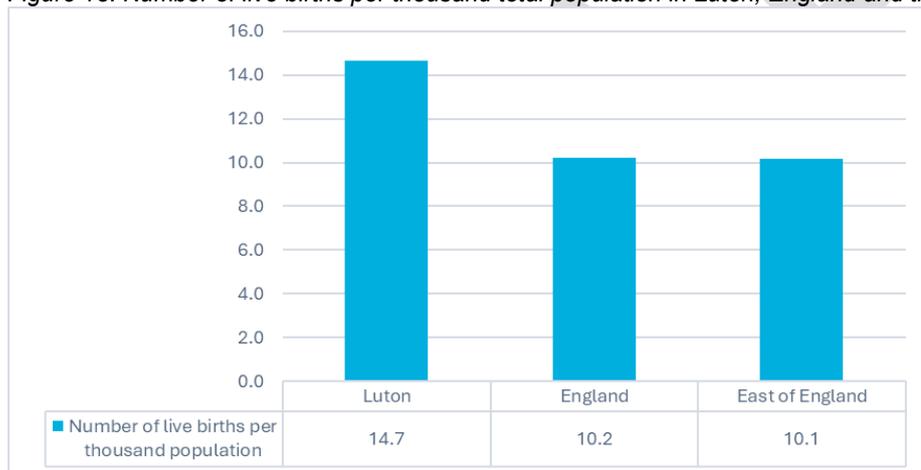
Pregnancy and maternity discrimination apply to people who are pregnant or expecting a baby and during the period after the birth.

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

### Baseline equality data

The General Fertility Rate (GFR) refers to the number of live births per 1,000 women aged 15-44 in a given year. In Luton the GFR was 69.1 in 2023, much higher than both the GFR across England (49.9) and for the East of England (52.7). Figure 13 reinforces this, showing the number of live births per thousand total population in Luton is 14.7 (using 2022 births against Census 2021 population) which is again much higher than for both England (10.2) and the East of England (10.1). Although data shows that the number of live births has been declining overall nationally, the rate of live births in Luton has consistently remained above the national average<sup>6</sup>.

Figure 13: Number of live births per thousand total population in Luton, England and the East of England



Source: UK Census 2021 (ONS)

## Gender reassignment

### Definition according to the Equality Act 2010

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

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

In relation to the protected characteristics of gender reassignment:

- a reference to a person who has a particular characteristic is a reference to a transsexual person, and

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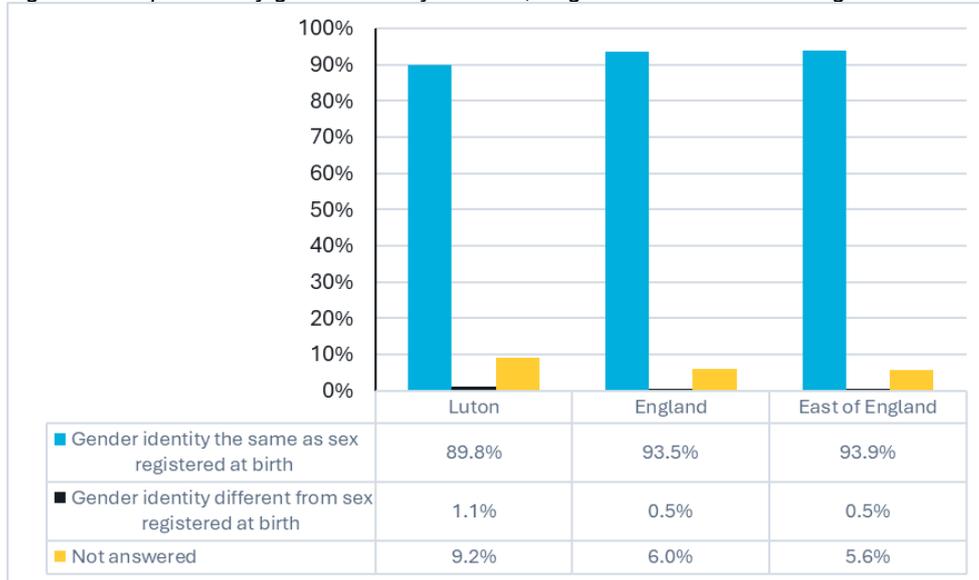
<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/livebirths/bulletins/birthsummarytalesenglandandwales/2023#fertility-rates-by-area>

- a reference to persons who share a protected characteristic is a reference to transsexual persons.

### Baseline equality data

Figure 14 presents Census 2021 data on population by gender identity. 1.1% of the population of Luton have a gender identity that is different from their sex registered at birth. This is higher than both the England as a whole (0.5%) and the East of England (0.5%). 9.2% did not answer, which is also higher than both England (6.0%) and the East of England (5.6%).

Figure 14: Population by gender identity in Luton, England and the East of England



Source: UK Census 2021 (ONS)

UK crime data for 2019/20 shows 'Transgender identity' accounts for 1% of hate crimes recorded by the British Transport Police. UK crime data for the year ending March 2024 shows that transgender hate crimes now account for 3% of all hate crimes recorded, up from 1% a decade ago (year ending March 2014)<sup>7</sup>.

The 2021 Sustrans Walking and Cycling Index (formerly known as Bike Life) found that only 51% of people who identified their gender 'in another way' feel welcome and comfortable walking or spending time on the streets of their neighbourhood, compared to 65% of women and 67% of men. Only 59% of LGBTQ+ people feel welcome and comfortable walking or spending time on the streets in their neighbourhood, compared to 67% of heterosexual people<sup>8</sup>.

## Race

### Definition according to the Equality Act 2010

Race includes:

- colour;
- nationality, and
- ethnic or national origins.

In relation to the protected characteristic of race –

- a reference to a person who has a particular protected characteristic is a reference to a person of a particular racial group, and

<sup>7</sup> <https://www.gov.uk/government/statistics/hate-crime-england-and-wales-year-ending-march-2024/hate-crime-england-and-wales-year-ending-march-2024>

<sup>8</sup> <https://www.sustrans.org.uk/the-walking-and-cycling-index/>

- a reference to persons who share a protected characteristic is a reference to persons of the same racial group.

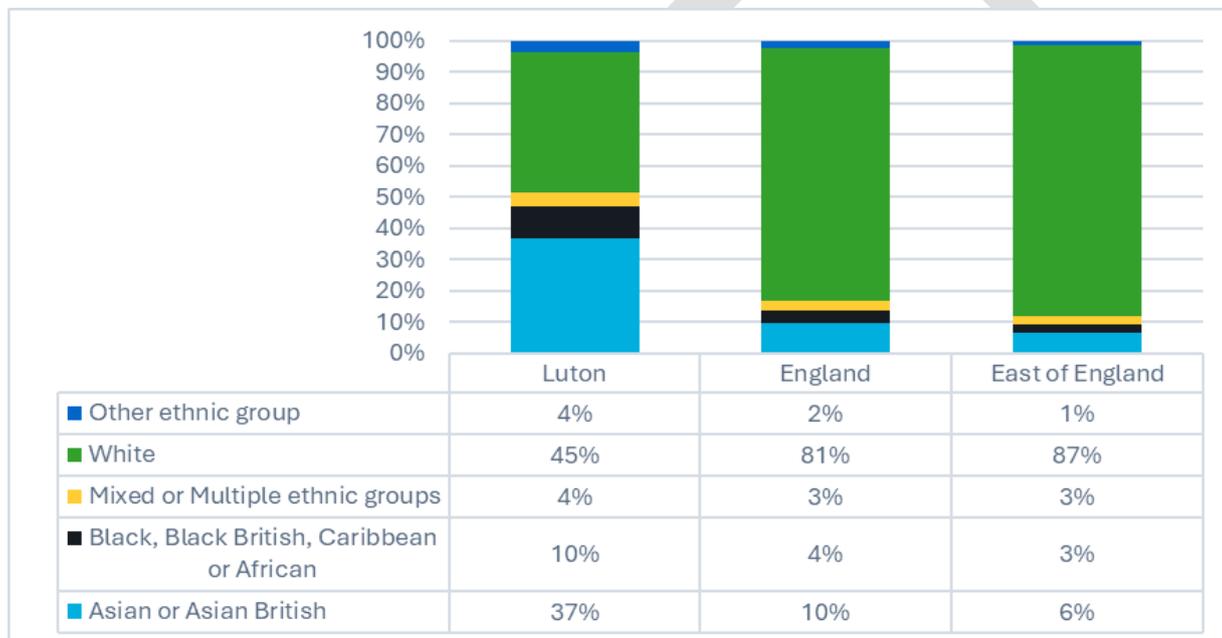
A racial group is a group of persons defined by reference to race; and a reference to a person's racial group is a reference to a racial group into which the person falls.

The fact that a racial group comprises two or more distinct racial groups does not prevent it from constituting a particular racial group.

### Baseline equality data

Figure 15 presents the population of Luton, and the East of England and England as a whole, by ethnicity. Based on Census 2021 data, nearly half (45%) of the borough's population is 'White', making it the most common ethnicity. However, this is much lower than both the England average (81%) and the East of England average (87%). 'Asian or Asian British' ethnicities make up 37% of Luton's population, which conversely is much higher than both the England average (10%) and the East of England average (6%). 'Black, Black British, Caribbean or African' ethnicities make up 10% of Luton's population, which again is much higher than the England average (4%) and the East of England average (3%).

Figure 15: Population by ethnicity in Luton, England and the East of England



Source: UK Census 2021 (ONS)

## Religion

### Definition according to the Equality Act 2010

Religion means any religion and a reference to religion includes a reference to a lack of religion.

Belief means any religious or philosophical belief and a reference to belief includes a reference to a lack of belief.

In relation to the protected characteristic of religion or belief:

- a reference to a person who has a particular protected characteristic is a reference to a person of a particular religion or belief;
- a reference to persons who share a protected characteristic is a reference to persons who are of the same religion or belief.

### Baseline equality data

Figure 16 presents Census 2021 data on usual resident population by religion. Compared with England and the East of England, Luton has a significantly higher proportion of Muslim residents; 25% of the population versus 5% and 3%, respectively. It also has a more religious population overall, 17% of residents said they have no religion compared with 25% across England and 28% across the East of England.

Figure 16: Population breakdown by religion in Luton, England and the East of England



Source: UK Census 2021 (ONS)

## Sex

### Definition according to the Equality Act 2010

In relation to the protected characteristic of sex –

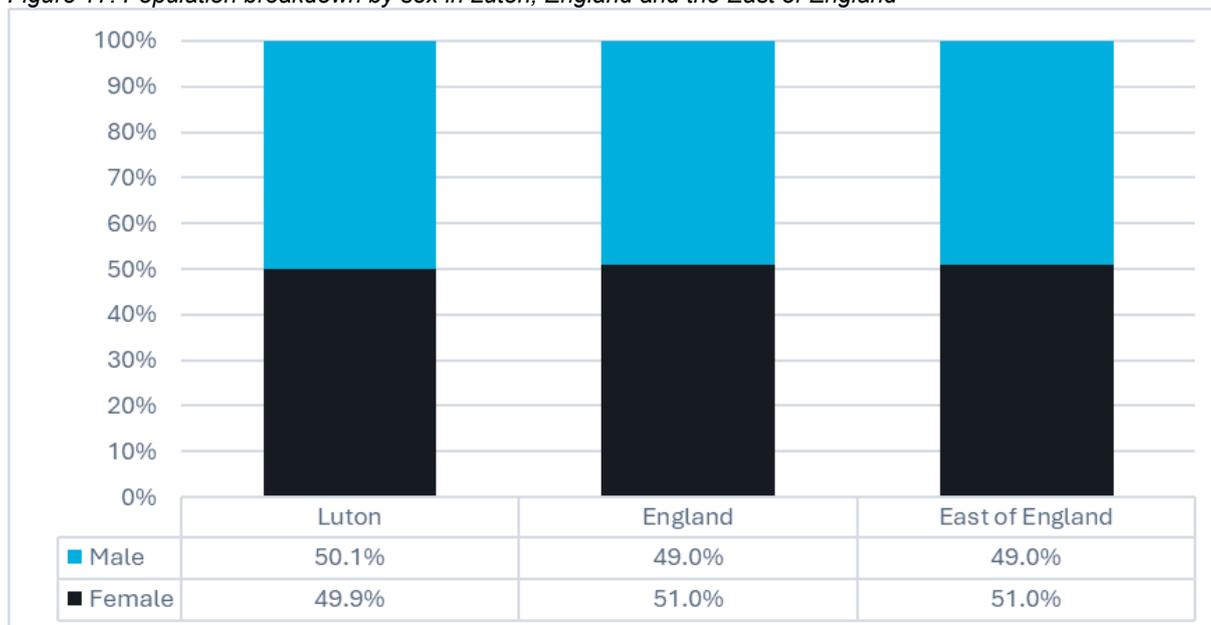
- a reference to a person who has a particular protected characteristic is a reference to a man or to a woman, and
- a reference to persons who share a protected characteristic is a reference to persons of the same sex.

### Baseline equality data

Figure 17 presents Census 2021 data on usual resident population by sex. The percentage split in Luton is relatively similar to that of the East of England and England as a whole, with slightly more male residents at 50.1% compared with 49.0%.

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Figure 17: Population breakdown by sex in Luton, England and the East of England



Source: UK Census 2021 (ONS)

Female travel needs can be more complex than males due to a range of factors; the increased likelihood of travelling with a buggy and/or shopping affects the travel choices females make, and females are also more likely to be carers of children<sup>9</sup>, further affecting the choices they make.

As people age, they become more prone to developing complex health conditions such as dementia and Type 2 diabetes. Conditions such as this can have a significant impact on people’s ability to move around and can increase the risk of falls. This in turn can lead to people living more reclusive lifestyles.

The Local Transport Plan should also ensure that new development is inclusive and accessible to all users, with careful consideration given to the design of public space. Seating, as well as shade and shelter from the elements should be incorporated into these designs so that older people have places to sit, rest and socialise.

Improving access to public transport should also be an important part of the Local Transport Plan, particularly in areas which may have lower levels of car ownership due to certain condition related to ageing and in areas that are less well served currently by public transport. This will provide older people with better opportunities to access key services and reduce social isolation.

## Sexual orientation

### Definition according to the Equality Act 2010

- Sexual orientation means a person’s sexual orientation towards
- persons of the same sex;
- persons of the opposite sex, or
- persons of either sex.

### In relation to the protected characteristics of sexual orientation

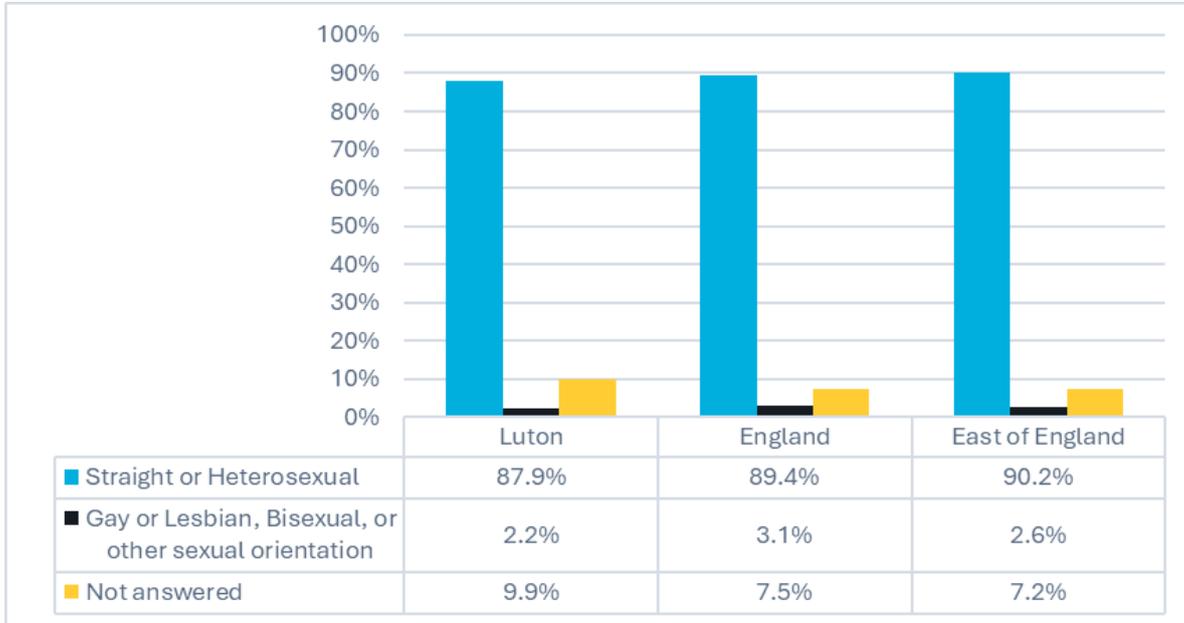
- a reference to a person who has particular protected characteristic is a reference to a person who is of a particular sexual orientation, and
- a reference to persons who share a protected characteristic is a reference to persons who are of the same sexual orientation.

<sup>9</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/476635/travel-to-school.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/476635/travel-to-school.pdf)

**Baseline equality data**

Figure 18 presents Census 2021 data on population by sexual orientation. Around 90% of people in Luton, England and the East of England are ‘Straight or Heterosexual’ (87.9%, 89.4% and 90.2%, respectively). 2.2% of people in Luton are ‘Gay or Lesbian, Bisexual, or other sexual orientation’, slightly lower than the England average (3.1%) and the East of England average (2.6%). However, 9.9% of people in Luton did not answer, notably higher than across both England (7.5%) and the East of England (7.2%).

Figure 18: Population breakdown by sexual orientation in Luton, England and the East of England



Source: UK Census 2021 (ONS)

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# Impact Assessment

The assessment considers the potential disproportionate positive and negative impacts of achieving the objectives of Local Transport Plan on protected characteristic groups. This is an assessment of the five objectives that will deliver the Local Transport Plan's vision. Policies across each of the LTP Chapters collectively support each of the different objectives, to different extents. This assessment should be read in conjunction with the LTP: specific LTP policies are referenced where the implementation of these are expected to have particularly disproportionate impacts for protected characteristic groups.

## Objective 1: Create safer, active and healthier places that are liveable and improve quality of life for everyone

Supporting policies focus on creating a more sustainable, accessible, and safer urban environment by promoting active forms of transport and ensuring public spaces are readily available and utilised. Key policies include:

- Deploying enhanced active travel and public realm design principles
- Enhancing active travel infrastructure by implementing the Council's Local Cycling and Walking Implementation Plan (LCWIP) and conducting regular reviews of the programme to assess and adjust priorities for active travel routes
- Access to parks, green spaces and the River Lea
- Education, training and promotion, and encouraging uptake of physical activity, in turn, supporting Luton Council's Sport and Physical Activity Delivery Plan
- Transport safety and security

It is noted that policies outlined across the LTP (Local Transport Plan) Chapters and Objectives are interconnected and collectively contribute to achieving Objective 1 and its outcomes. Strategic Outcomes of this objective include:

- Reduced number of collisions numbers or consequent reduction in people killed or seriously injured (KSI)
- Increased levels of physical activity
- Improved access to green and blue spaces
- Improved air quality
- Reduced levels of noise pollution

Protected characteristic groups potentially impacted

- Age
- Disability
- Sex
- Pregnancy and maternity
- Race
- Gender reassignment
- Sexual orientation
- Religion or belief

## Summary of potential positive impacts

**Age:** Older and younger people are at greater risk of social isolation and exclusion related to transport. Cycling and walking are the most affordable forms of transport, providing a sense of independence and freedom without having to rely on private car travel. All public transport also starts and ends with a walking, cycling or wheeling trip. Therefore, measures to prioritise and improve the integration and quality of the active travel network, better connecting older and younger people to places of employment, education, health and leisure are likely to have disproportionately benefits for these groups, in turn, helping to support and improve quality of life (Policies 01B, 01E, 01F, 01G, 02H).

In 2023, the National Travel Survey recorded that children aged 0 to 16 made the highest proportion of trips using active transport modes such as walking and cycling in 2023 with 37%<sup>10</sup>. Younger people are therefore likely to disproportionately benefit from active travel training and education such as 'Bikeability' and 'Walking Buses', as these schemes specifically target places of learning for young people. There is a higher prevalence of people aged 15 and under in Luton, who are therefore likely to benefit from this objective (Policies 04A, 04F, 04G, 04H).

In terms of road safety, both older and younger people are considered to be more vulnerable on the road. Older individuals may experience physical and sensory impairments related to ageing that impacts their ability to react at pace to road hazards<sup>11</sup>. Younger individuals, may be inexperienced in travelling across transport networks, and more prone to risk-taking behaviours<sup>12</sup>. This is reflected in how 32% of road casualties in Luton between 2021 – 2023 occurred in people up to the age of 25 (see Figure 7).

Road-safety related anxieties may deter older and younger people from engaging with active travel. Therefore, measures to improve the quality of the active travel network, for example, through segregated, high-quality active travel infrastructure, can help to reduce this barrier and extend the benefits of active travel to these groups who may otherwise remain discouraged from choosing these modes. Furthermore, policies promoting a broader modal shift to public transport (e.g., Policies 6–9) can indirectly enhance active travel safety.

By reducing the number of individual vehicles on the road, these policies create a less intimidating and safer environment for active travellers. This reduction in traffic volume can make active journeys more attractive to older and younger people, who may otherwise feel or perceive themselves to be more vulnerable when sharing roads with numerous vehicles.

**Disability:** Enhanced active travel environments to improve the comfort (Policy 01E) of active travel on the network, alongside perceptions of safety, can disproportionately benefit disabled people. Despite Luton having a lower reported prevalence of disabled people than the national and regional average, Census 2021 data shows that the day-to-day activities of Luton residents are limited a lot (6.2%) or a little (7.6%), comprising a significant proportion of the population (approximately 13%). In addition, some disabled people may be precluded from driving due to their impairment, therefore, active travel modes may constitute the primary, essential means of mobility for some disabled users.

Therefore, for people using a wheelchair or other mobility aids when travelling, smooth, well-maintained surfaces free from cracks, potholes, or excessive gradients support the comfort and ease of movement. Similarly, consistent, tactile paving helps visually impaired individuals navigate safely and independently. In addition, clear, wide, and unobstructed pathways minimise the risk of

<sup>10</sup> <https://www.gov.uk/government/statistics/national-travel-survey-2023/nts-2023-mode-share-and-multi-modal-trips>

<sup>11</sup> <https://pmc.ncbi.nlm.nih.gov/articles/PMC9643822/>

<sup>12</sup> <https://www.who.int/news-room/questions-and-answers/item/road-traffic-injuries-children>

collision, helping to reduce anxiety when using the network, fostering a more relaxed and less fatiguing travel experience.

Disabled people are more likely to require regular access to health services than those who are not disabled. Consequently, measures to improve active travel routes to GP surgeries and hospitals are likely to have a disproportionately positive impact on this characteristic group. The most commonly cited impairments of people aged 16 and over in England include mobility issues, stamina, breathing or fatigue, dexterity, mental health, hearing and vision. As individuals with hearing and visual impairments are likely to face greater barriers when interacting with audio-visual information across the transport network, they are likely to benefit disproportionately from measures to improve legibility and wayfinding (Policy 01E) across the network.

Moreover, encouraging active travel uptake is a key strategy for enhancing air quality (Policy 04A) as facilitating the shift from private vehicle trips zero-emission journeys supports air quality improvements. This can disproportionately benefit disabled people who are particularly vulnerable to air pollution such as those who are susceptible to breathing impairments.

Disabled people are at significantly greater risk of collisions, injuries, and fatalities, often due to a combination of driver behaviour, infrastructure-related risks, and individualised factors. Analysis of the UK's National Travel Survey, disabled people are five times more likely to be injured as a pedestrian than non-disabled people – reporting 22 motor vehicle injuries per million miles walked, compared to 4.8 among pedestrians without a disability<sup>13</sup>.

Therefore, creating safer environments for active travel (Policies 01A, 01I, 02H and Policy 5) is assumed to have a disproportionately positive impact for disabled people, by reducing road danger risks. Furthermore, policies promoting a broader modal shift to public transport (e.g., Policies 6–9) can also indirectly enhance active travel safety. By reducing the number of individual vehicles on the road, these policies create a less intimidating and safer environment for active travellers. This reduction in traffic volume can make active journeys more attractive to older and younger people, who may otherwise feel or perceive themselves to be more vulnerable when sharing roads with numerous vehicles.

**Sex:** A survey conducted by Statista in 2021 across 17 UK cities, showed that men feel safer than women and other genders when it comes to walking and cycling in their local area. On average, 70% of men feel safer walking compared to 68% for women and 60% for other genders. Cycling was perceived to be less safe with 40% for men, 38% for other genders and 35% for women<sup>14</sup>. The LTP references a street maintenance and street lighting programme which is likely to reduce fear and benefit those who feel unsafe on these routes.

**Pregnancy and maternity:** Pregnant people may have reduced mobility and can therefore require longer times to make active journeys, such as when crossing roads. In addition, pedestrians travelling with prams may require additional time to navigate kerbs when crossing the street. Therefore, measures within policies that seek to improve footway comfort (e.g., smoother surfaces, wider paths), enhance pedestrian priority (e.g., longer crossing times, less footway clutter), and increase clearance in public spaces directly address these specific challenges. By creating more intuitive, less physically demanding, and safer active travel environments, these interventions significantly ease the burden of everyday travel for pregnant people and those with prams, making walking, wheeling, and accessing public spaces genuinely viable and comfortable options where they might otherwise be prohibitive.

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<sup>13</sup> <https://www.sciencedirect.com/science/article/pii/S2214140517306308>

<sup>14</sup> *Safety of walking and cycling by gender in the UK*, Statista (2021): [Safety of walking and cycling by gender in the UK 2021 | Statista](#)

Pregnant women will disproportionately benefit from mode shift measures that reduce air pollutants, as polluted air is harmful for babies in the womb. Often, poor air quality can cause premature birth or low birth weight which can contribute to higher infant mortality. Newborn babies, young babies in prams and children are more vulnerable to breathing in polluted air than adults due to their airways being in development. Exposure to poor air quality during foetal development can have long term implications on childhood and beyond, thus any measures to reduce congestion while simultaneously improving the provision of active travel and the public realm will benefit pregnant women.

The General Fertility Rate (GFR) refers to the number of live births per 1,000 women aged 15-44 in a given year. In Luton the GFR was 69.1 in 2023, much higher than both the GFR across England (49.9) and for the East of England (52.7), meaning that this positive impact would be more likely to disproportionately benefit pregnant women.

**Race:** All public transport also starts and ends with a walking, cycling or wheeling trip, which suggests a need for improving the safety and convenience of using these modes. There is a large proportion of non-white people in Luton in comparison to both the East of England and England. 'Asian or Asian British' ethnicities make up 37% of Luton's population, which conversely is much higher than both the England average (10%) and the East of England average (6%). 'Black, Black British, Caribbean or African' ethnicities make up 10% of Luton's population, which again is much higher than the England average (4%) and the East of England average (3%). Therefore, as there is a relatively large non-white population within Luton, improvements to the active travel network will disproportionately benefit ethnic minorities.

**Gender reassignment and Sexual Orientation:** 1.1% of the population of Luton have a gender identity that is different from their sex registered at birth. This is higher than both the England as a whole (0.5%) and the East of England (0.5%). The 2021 Sustrans Walking and Cycling Index (formerly known as Bike Life) found that only 51% of people who identified their gender 'in another way' feel welcome and comfortable walking or spending time on the streets of their neighbourhood, compared to 65% of women and 67% of men.

UK crime data for 2019/20 shows 'Transgender identity' accounts for 1% of hate crimes recorded by the British Transport Police. UK crime data for the year ending March 2024 shows that transgender hate crimes now account for 3% of all hate crimes recorded, up from 1% a decade ago (year ending March 2014)<sup>15</sup>. Therefore, an improved active travel environment that improves safety alongside perceptions of safety can disproportionately benefit people with a gender identity that is different from their sex registered at birth.

Similarly, the 2021 Sustrans Walking and Cycling Index (formerly known as Bike Life) found that only 59% of LGBTQ+ people feel welcome and comfortable walking or spending time on the streets in their neighbourhood, compared to 67% of heterosexual people<sup>16</sup>.

**Religion or belief:** Religious commitments can sometimes leave little time for sporting activities, for example, some young Asian Muslims attend mosque after school, which means they have less leisure time than those from non-religious backgrounds<sup>17</sup>. Therefore, creating environments that enable and encourage people to cycle more often can lead to exercise being built into their day, rather than having to go out of their way to achieve it. Census data shows that nearly a third (32.9%) of Luton's population identify as Muslim, which is significantly higher than the East of

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<sup>15</sup> <https://www.gov.uk/government/statistics/hate-crime-england-and-wales-year-ending-march-2024/hate-crime-england-and-wales-year-ending-march-2024>

<sup>16</sup> <https://www.sustrans.org.uk/the-walking-and-cycling-index/>

<sup>17</sup> *What are the barriers to cycling amongst ethnic minority groups and people from deprived backgrounds?*, TfL (2011): [Barriers to cycling for ethnic minorities and deprived groups \(tfl.gov.uk\)](https://www.tfl.gov.uk/road-traffic/active-travel/cycling/barriers-to-cycling-for-ethnic-minorities-and-deprived-groups)

England (3.7%) and nationally (6.5%), therefore the associated benefits to this group are likely to be disproportionately positive.

### Potential Negative Impact

**Disability:** Traffic management schemes, including those involving permanent or time-restricted alterations to private vehicle and/or taxi movements, or the reallocation of road space (e.g., for active travel infrastructure, bus lanes), have the potential to disproportionately impact disabled people who may prefer or need to use private vehicles as a result of their disability.

## Objective 2: Tackle inequalities through sustainable, accessible, affordable and reliable transport choices that sustainably connect people with the key services and opportunities they need

Supporting policies show a comprehensive strategy for improving public transport includes:

- Public transport infrastructure
- Public transport services and on-demand transport
- Customer experience and fares
- Public transport partnerships and reform

It is noted that policies outlined across the LTP (Local Transport Plan) Chapters and Objectives are interconnected and collectively contribute to achieving Objective 2 and its outcomes.

Strategic Outcomes of this objective include:

- Increased accessibility of the transport network
- Increased access to key services by sustainable modes
- Greater access to employment hubs and opportunities
- Reduced cost of travel by public transport (and other shared modes)

### Protected characteristic groups potentially impacted

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

**Age:** Younger people are more likely to disproportionately benefit from improvements to public transport and active travel infrastructure. Nationally, people aged 17 to 20 years old are more likely to use public transport than any other group (20%), and those aged 21 to 29 years old are second most likely (11%). Therefore, general improvements to the public transport network will provide greater access to the services (health, education, retail, leisure, and work) young people in Luton need.

Older people who do not have access to a private vehicle may benefit from improved public transport connections and access to the services they need. Older people are more likely to experience reduced mobility due to ageing and are consequently likely to see additional transfers between buses and trains, and indirect routes, as greater barriers. Therefore, older people are likely to disproportionately benefit from measures designed to improve direct access to essential services and greater integration between journeys and modes. In addition, older people are more likely to experience health issues due to ageing and are therefore likely to disproportionately benefit from measures to improve bus routes to GP surgeries and hospitals.

**Disability:** Disabled people who do not have access to a private vehicle may benefit from simpler and easier journeys using public transport, with improved transport connections and access to key services or opportunities. Public transport, or lack thereof can be a key enabler or barrier to accessing employment opportunities. In 2018, 18% of those who were unemployed turned down a job or decided not to apply due to problems with transport<sup>18</sup>. This can be exacerbated for disabled people, who may have even more limited travel options due to mobility impairments. Therefore, improvements in the integration and quality of the public transport network are likely to have significant positive impacts for groups most at risk of social isolation and exclusion due to transport.

Disabled people are more likely to require regular access to health services than non-disabled people. During the 2022 GP Patient Survey, over 55% of patients said they have a long-term health problem or disability<sup>19</sup>. Consequently, measures to improve bus routes to GP surgeries and hospitals are likely to have a disproportionately positive impact on this characteristic group.

It is recognised that fixed-route public transport services may not always be able to adequately serve the diverse needs of all disabled individuals, particularly in areas of lower population density, for specific journey purposes (e.g., healthcare appointments), or during off-peak hours. In such instances, Demand-Responsive Transport (DRT) (Policy 14F) emerges as a vital, complementary solution to ensure comprehensive mobility.

**Sex:** Improvements to public transport, such as the creation of a high frequency core bus network, with improved messaging and information provision (Policies 7 and 8) will disproportionately benefit women who are slightly more likely to use buses according to national data (3% vs 2%). Though this data only provides a national picture and does not provide us with a regional breakdown of travel in Luton by sex.

**Pregnancy and maternity:** Pregnant women are likely to experience reduced mobility due to their physical condition, while new parents with prams are likely to require increased clearance while navigating public spaces and cannot effectively navigate environments with steps. Therefore, upgrading the public realm around transport hubs (Policy 5) and improving the comfort of vehicles will help to enhance the comfort of journeys for parents with prams). In addition, the proposed rollout of zero-emission buses (Policy 23) will also deliver immediate air quality improvements in their operational areas, providing crucial benefits for the health of pregnant people and their babies in-utero, with corresponding benefits as outlined previously for Objective 1.

**Race:** Due to the large proportion of non-white residents in Luton, overall public network improvements are likely to disproportionately benefit minority ethnic groups. In 2019, National Travel Survey data showed that ethnic minorities are more likely to use buses (3%) than people who are white (2%)<sup>20</sup>.

**Gender reassignment and Sexual orientation:** People who identify as LGBTQ+ have been shown to experience disproportionate personal safety and security issues when travelling, which may include the fear of (or experience of) victimisation. As such, it is expected that improved perceptions of safety in and around interchanging public transport can improve through enhanced CCTV, safety and security measures (Policy 5), and also deter harassment and anti-social behaviour.

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<sup>18</sup> *Difficulties in job searching due to problems with transport*, The Health Foundation (2023): [Difficulties in job searching due to problems with transport - The Health Foundation](#)

<sup>19</sup> *GP Patient Survey 2022*, NHS England (2022): [Statistics » GP Patient Survey 2022 \(england.nhs.uk\)](#)

<sup>20</sup> <https://www.ethnicity-facts-figures.service.gov.uk/culture-and-community/transport/travel/latest/#by-ethnicity-number-of-trips-and-mode-of-transport>

## Objective 3: Increase the availability of sustainable transport choices for all and reduce car dependency

Supporting policies represent a comprehensive strategy for strengthening inter-urban public transport connections, seek opportunities to optimise strategic highways through targeted upgrades and demand management, and leverage digital connectivity to create a more efficient and integrated system, spanning:

- Strategic integration
- Inter-urban public transport
- Strategic and major highways
- Strategic demand management
- Digital connectivity

It is noted that policies outlined across the LTP (Local Transport Plan) Chapters and Objectives are interconnected and collectively contribute to achieving Objective 3 and its outcomes. Strategic Outcomes of this objective include:

- Increased number of trips made using sustainable transport modes
- Improved customer experience of sustainable travel

### Protected characteristic groups potentially impacted

- Age
- Disability
- Sex
- Pregnancy and maternity
- Race
- Gender reassignment
- Sexual orientation
- Religion or belief

**Age:** The overall objective to increase sustainable transport choices and reduce car dependency holds significant potential for positive impacts across all age cohorts, though the benefits may manifest differently. 25% of households in Luton do not have access to a car or van. Younger people face increasing barriers to car ownership and access. For children and young people, particularly those below driving age or without access to a car, expanded sustainable transport choices (walking, cycling, public transport) directly translate to greater independence. This enables them to access education, social activities, sports, and part-time employment without relying on adult drivers.

Moreover, fewer cars on the road, particularly around schools and residential areas, can lead to safer environments for children walking and cycling. Finally, improving the variety of reliable and affordable public transport or safe active travel routes are crucial for accessing further education (colleges, universities), apprenticeships, and entry-level job opportunities. Improvements to the connectivity of the overall network through improving intermodal connectivity can ensure opportunities that currently require car routes or early/late travel are more accessible.

**Disability:** Overall, measures that support this objective collectively improve choice and convenience and reduce the complexity of navigating multiple transport systems. Implementing these measures can help reduce travel time and fatigue for disabled travellers, in turn enhancing equality of access to expand access to jobs, education, specialist healthcare, and social connections within and beyond Luton.

Delivering more reliable and efficient bus services (Policies 7 - 9) will help to support more predictable journey times, which will directly benefit disabled people by ensuring a consistent passenger experience, and also help to reduce anxiety when travelling. This will be supported by integration of accessibility

standards (Policy 10I) across bus and rail infrastructure and services. Measures that directly address current accessibility issues, such as at Luton and Leagrave station provide a direct response to accessibility barriers that currently impede journey comfort and independent travel. In addition, increased rail capacity means less crowded trains, which will benefit some people with mobility-related impairments and neuro differences.

In addition, improvements to inter-modal travel will disproportionately benefit disabled people as integrated ticketing and co-ordinated timetables can simplify journeys, thereby reducing stress and anxiety when travelling, and help to ensure journeys run smoothly. This can minimise overall journey time, as longer journeys can be less comfortable, or more complex for some people with mobility-related impairments. Moreover, the development of local mobility hubs can serve as accessible transfer points, offering sheltered waiting and facilities where people need to wait whilst making their journeys.

Finally, while this objective is primarily focused on public transport inter-connectivity, Policy 12 (Strategic and Major Highways) can offer some benefits to disabled drivers and those using taxis by reducing congestion and improving journey reliability, which can also contribute to more predictable travel times for essential journeys. Minimising delays in journeys can improve overall journey comfort for some disabled people who experience pain or discomfort when travelling.

**Sex:** Women are more likely to undertake more complex 'trip-chaining' (combining commutes with childcare or caregiving duties) and nationally record more journeys than men. Providing enhanced intermodal and interurban connectivity can help to improve their day-to-day mobility (this benefit also extends to parents and guardians travelling with children. In addition, women often report higher perceptions of insecurity on public transport, in stations, at bus stops, and in public spaces, especially during unsocial hours or in poorly lit areas. greater frequency of late-night services can indirectly enhance safety by reducing waiting times at isolated stops.

**Pregnancy and Maternity:** Streamlining intermodal connections, is particularly beneficial for pregnant women and parents travelling with children. During pregnancy, people may experience mobility limitations, and new parents with prams necessitate ample clear space and entirely step-free environments for effective navigation. By reducing complexities in undertaking intermodal connections, public transport journeys will become significantly more comfortable for pregnant women and parents travelling with children.

**Race:** As there is a relatively large non-white population within Luton, improvements to the active travel network will disproportionately benefit ethnic minorities.

**Gender reassignment and Sexual orientation:** People who identify as LGBTQ+ have been shown to experience disproportionate personal safety and security issues when travelling, which may include experience fear of victimisation and refrain from public displays of affection when travelling.

As such, it is expected that improved perceptions of safety in and around interchanging public transport can improve through enhanced CCTV, safety and security measures, and also deter harassment and anti-social behaviour.

**Religion or belief:** Census data shows that nearly a third (32.9%) of Luton's population identify as Muslim, which is significantly higher than the East of England (3.7%) and nationally (6.5%). The demographic scale of the Muslim population in Luton means that any general improvements in public transport will naturally extend their benefits to a larger number of individuals within this group, leading to a disproportionately positive impact on their daily lives, access to places of worship and community, education, employment, key services, and overall well-being.

In addition, addressing issues of perceived safety, particularly at public transport interchanges or walking routes, benefits all users, but given the large representation, the aggregate positive impact on the Muslim community will be more pronounced.

### Potential negative impacts

**Age, Disability, Pregnancy and Maternity, Race, and Religion:** Highway capacity can induce demand where the improved conditions encourage more people to drive or make longer car journeys. This can ultimately result in a net increase in vehicle kilometres travelled and, consequently, an increase in overall emissions of pollutants (e.g., NOx, PM2.5).

This outcome would be directly converse to the air quality improvements anticipated from policies promoting active travel and zero-emission vehicles, with potential negative impacts extending to health risks for older and younger people, pregnant women and babies in-utero, and some disabled people with impairments that can be exacerbated by poor air quality. Due to the comparatively high demographic scale of non-white, and Muslim people in Luton, this disbenefit could subsequently extend to these groups.

**Age and Disability:** While the overarching aim of improving digital connectivity (Policy 14) is to enhance the usability and management of Luton's transport network, there is a potential negative impact of digital exclusion and accessibility barriers for some disabled and older people. Some proposed policies, such as ticket purchasing apps, and real-time passenger information (15E), are heavily reliant on users' ability to access and effectively interact with digital platforms.

Some disabled and/or older people may prefer or require non-digital assistance, and making journeys could be more stressful or difficult without maintaining adequate staffing support.

## Objective 4: Enable inclusive growth through enhanced sustainable connectivity and access to economic opportunities

Policies to support this network focus on strategically connecting Luton's development with its transport network, encompassing detailed planning principles for airport and broader developments. This includes specific attention to parking management and the efficient movement of freight and urban logistics throughout the area.

- Planning principles
- Airport related development
- Broader developments
- Parking
- Freight and urban logistics

It is noted that policies outlined across the LTP (Local Transport Plan) Chapters and Objectives are interconnected and collectively contribute to achieving Objective 4 and its outcomes.

Strategic Outcomes of this objective include:

- Reduced journey times by sustainable modes
- Improved journey time reliability
- Reduced delay from unplanned transport and weather-related events
- Increased labour market catchment for employers
- More new homes and other developments located near high-frequency public transport hubs

### Protected characteristic groups potentially impacted

- Age
- Disability
- Sex

**Age:** A well-connected transport network, capable of reliably moving people to and from employment, education, and training centres, is a fundamental enabler of inclusive growth for

younger people. Enhanced sustainable connectivity, particularly through reliable public transport (e.g., improved bus and rail services, inter-urban links), directly broadens the accessibility of apprenticeships, further education colleges, universities, and entry-level employment opportunities. This is particularly crucial for younger individuals who may not have access to private vehicles.

For example, improved transport links to major employment hubs like Luton Airport will facilitate access to a wide range of jobs, from operational roles to service positions, which can serve as critical pathways into the workforce for young people. By reducing travel time and cost barriers, this objective directly supports their ability to gain skills, enter employment, and contribute to the local economy. Similarly, enhancing connectivity to economic opportunities is also vital for enabling older people to remain economically active, access retraining opportunities, or pursue volunteering roles that benefit the community.

In addition, rationalising freight movements across our road network through a comprehensive policy framework presents a significant opportunity to enhance road safety, particularly for younger people. By consolidating deliveries, optimising routes, encouraging off-peak operations, and shifting volumes away from large, road-based vehicles where feasible, the overall number of goods vehicles on roads will reduce.

This reduction directly mitigates collision risks, as large vehicles often have larger blind spots and require greater stopping distances, posing a disproportionate danger to children. LGV and HGV accidents are often more deadly than other road accidents due to the sheer size and weight of the vehicles involved. The impact force from a collision with a large truck can be significantly greater, leading to more severe injuries for those making active journeys or in smaller vehicles.

Between 2021 – 2023, vans and HGVs were involved in the second highest number of road collisions (following car-related accidents), comprising 7% of collisions across Luton's network. Therefore, policies to reduce large road vehicle movements will bring about disproportionate benefits in reducing road danger for younger people.

**Disability:** Between 2021 – 2023, vans and HGVs were involved in the second highest number of road collisions (following car-related accidents), comprising 7% of collisions across Luton's network. Fewer HGVs mean reduced exposure to risk for visually impaired individuals navigating crossings or wheelchair users sharing road space. Therefore, policies to reduce large road vehicle movements will bring about disproportionate benefits in reducing road danger for some disabled people.

#### Negative impacts

**Disability:** Changes to existing parking policy (Policy 17) that reduce, limit, or de-incentivise parking and its availability may have a potential negative impact for some disabled people who drive. Mandatory and minimum standards for blue badge parking will help to ensure that provision is available, however, parking demand and availability should be kept under regular review to ensure that disabled people who require use of private vehicles are able to access accessible parking for vehicles.

## Objective 5: Drive rapid decarbonisation in the movement of people and goods in line with local and central government targets, embracing innovation and technology

Policies to outline this objective support a multimodal approach to reducing transport-related emissions and promoting sustainable travel. They focus on managing travel demand, electrifying various transport modes (buses, rail, private vehicles, micromobility), exploring alternative fuels,

and ensuring these initiatives are financially supported, environmentally protected, and resilient through effective management and monitoring.

- Travel demand management
- Electric bicycle and micromobility
- Low and zero emission bus and coach
- Rail electrification
- Electric vehicle infrastructure
- Alternative fuels
- Budgets, offsetting and monitoring
- Protecting and enhancing the local environment
- Asset management and resilience

It is noted that policies outlined across the LTP (Local Transport Plan) Chapters and Objectives are interconnected and collectively contribute to achieving Objective 5 and its outcomes.

Strategic Outcomes of this objective include:

- Increased number of electric vehicles and chargepoints (and zero emission refuelling)
- Reduction in greenhouse gas emissions from travel and transport infrastructure

#### Protected characteristics potentially impacted

- Age
- Disability
- Ethnicity
- Pregnancy and Maternity
- Religion

#### General

People with one or more of the characteristics listed above are expected to benefit from the same potential positive impacts associated with this objective, with associated positive benefits as already identified previously

- Air quality improvements will provide a positive impact as a result of decreased vehicle pollutants.
- Road danger reduction through the rationalisation of freight and urban logistics.
- Reducing and rationalising vehicle movements in general, with travel demand management helping to reduce opportunities for risks on the transport network.

## Summary

This Equality Impact Assessment has assessed the likely positive and negative impacts of implementing the fifth Local Transport Plan. Impacts of the strategy on people with protected characteristics are expected to be predominantly positive, with these potential outcomes identified in this assessment. Disproportionately positive impacts are likely to be felt by people with certain protected characteristics with respect to:

- Personal safety and security
- Road safety
- Air quality
- System-wide improvements to journey times and infrastructure provision, increasing the attractiveness and comfort of journeys
- System-wide improvements to enhanced connectivity to key services and opportunities

This assessment has identified some potential negative outcomes, including:

- Reallocation of road space and parking (e.g. for active travel infrastructure, bus lanes), have the potential to disproportionately impact disabled people who drive, who may rely on private vehicles for essential mobility.
- Potential for induced demand on roads by private vehicles as a result of highway capacity improvements/enhancements, with associated negative impacts for road safety concerns and air quality that extend across all protected characteristic groups.
- Potential for digital policies to contribute to digital exclusion, though this may be for some disabled and older people.

It is important to note that in most cases where potential negative outcomes are identified, it is expected that proposed policies would still provide an overall improvement compared to the current business as usual conditions, but that some protected characteristics could see adverse impacts in the process.

## Suggested mitigating measures

- Ensure that permanent or time-restricted alterations to private vehicle and/or taxi movements are implemented with scheme-specific Impact Assessments to understand the scope and scale of localised impact on the immediate community, and design is undertaken in collaboration with the local community to minimise risk of adverse impacts.
- Where highway capacity is expanded, identify opportunities for greening measures in the immediate surroundings, providing supporting pollutant-sinks that minimise air pollution. Also identify opportunities to enhance road safety (such as speed calming measures and enforcement) to help to minimise opportunities for collisions with motor vehicles.
- Where scheme construction results in associated noise impacts, suitable mitigating measures should be determined and implemented on a location-specific basis, to ensure that no single community is disproportionately affected.
- Ensure design measures in relation to accessibility (such as toilets, seating, water points, sources of shade and cooling (preferably green/blue infrastructure) lighting and security and accessibility measures) are considered systemically during policy implementation.
- Promote both online and in-person communications regarding connectivity will help to minimise the risk of digital exclusion. Moreover, identifying opportunities to assimilate communities to the latest technology could involve targeted awareness sessions as well as on-site assistance to prevent digital exclusion.