

Improving People's Lives

Equality Impact Assessment / Equality Analysis (Version 4)

Item name	Details
Title of service or policy	City Centre Security Project – Proposed Access Restrictions
Name of directorate and service	Environmental Services – Highways, Transport and Parking
Name and role of officers completing the EqIA	Simon Thomas – Senior Engineer, Design & Projects Group
Date of assessment	Updated March 2025

Equality Impact Assessment (or 'Equality Analysis') is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on people and different groups within our community. The main aim is to identify any adverse impacts (i.e. discriminatory or negative consequences for a particular group or sector of the community, and to identify areas where equality can be better promoted). Equality impact Assessments (EqIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EqIA) or Equality Analysis. **Not all sections will be relevant – so mark N/A any that are not applicable**. It is intended that this is used as a working document throughout the process, and a final version will be published on the Council's website following relevant service lead approval.

1.1 Identify the aims of the policy or service and how it is implemented

Key questions	Answers / notes
 1.1 Briefly describe purpose of the service/policy e.g. How the service/policy is delivered and by whom If responsibility for its implementation is shared with other departments or organisations Intended outcomes 	Since 2017 Bath & North East Somerset Council have been working with the police – Counter-Terrorism Security Advisors and stakeholder organisations to improve security to key crowded streets and spaces within the city centre, particularly those areas vulnerable to hostile vehicle attack. Whilst there is no specific terrorism threat to Bath at present, counter terrorism advisors have advised that improved permanent protection and access restrictions should be a priority. Bath & North East Somerset Council therefore proposes to install purpose-designed controlled access points, replacing temporary measures and providing a higher quality of protection around the Bath Abbey, the Roman Baths and Pump Room, as well as the retail core of the city centre by early 2022. The council aims to ensure security measures combine protection of people, the economy and Bath's outstanding heritage through robust bursensitive design and management.

The project has been being delivered through the Council's Highways department with collaboration with its Emergency Management Planning Team, as well as frequent liaison with affected internal Council service providers.

The scheme was designed in accordance with the Council's Public Sector Equality Duty (as set out in the Equality Act 2010), and as set out in the Cabinet Report E3278, approved on 20 July 2021. A disabled person with a valid Blue Badge, either driving (including a hire car), drop-off/ picking-up by a friend, family or taxi can access Cheap Street. Westgate Street, Saw Close and Upper Borough Walls during the operational hours of 10am and 6pm. Blue badge holder parking is permitted on double yellow lines with the security zone (No Waiting at any time) for up to 3 hours. During the restricted hours 10.00am to 6.00pm, there is no delivery vehicles making deliveries, giving more opportunity for Blue Badge Holders to park. Community Transport vehicles are permitted into Hot Bath Street via Beau St to access St Michael's Day Centre. Parking along Beau St for Blue Badge Holder's outside The Gainsborough Hotel is available. Also, the existing parking arrangements on Beau Street between Bilbury Lane and Stall Street are currently unaffected. Stall St (including Lower Borough Walls, Bath St, Abbeygate St and Abbey Green) are restricted between 10.00am and 6.00pm, due to the volume of pedestrians that use the streets on a daily basis.

Following the July 2021 Cabinet decision, the Council involved disabled people and other stakeholders via focus groups (held on 15th and 17th November 2021) to create a system to enable Blue Badge Holders to gain access into the security zone in a vehicle. It also provided an opportunity to obtain feedback on further accessibility improvements within the security zone (e.g. dropped kerbs, raised tables etc). Project communications in the form of press releases and web pages were provided, as well as continuous project updates. All Blue Badge Holders

in B&NES were written to, to outline the new access arrangements, details of which are available at the following webpage. https://www.bathnes.gov.uk/check-eligibility-and-apply-access-restricted-bath-city-centre-streets. This also includes a user video, detailing how access is possible.

Permanent access restrictions at all locations came into operation on 1st January 2022, with York St coming into operation later in 2022 following a Public Inquiry.

Access was initially controlled using gates physically operated by traffic marshals but were gradually replaced with permanent Hostile Vehicle Mitigation bollards, installed 2023/24. York St was the first to be completed in May 2023, followed by Cheap St in October 2023; Hot Bath St in October 2023; Upper Borough Walls in June 2024 and Lower Borough Walls in October 2024. The bollards are semi-autonomous, with each vehicle requesting access being vetted via a video-intercom. Following completion, there have been very few reported problems with either access into the security zones or parking capacity.

- 1.2 Provide brief details of the scope of the policy or service being reviewed, for example:
 - Is it a new service/policy or review of an existing one?
 - Is it a national requirement?).
 - How much room for review is there?

Whilst there is no legal or national requirement for the provision of access restrictions and associated protection measures in city centres, counter terrorism police representing forces across the UK, are now advising local authorities that improved protection should be introduced. In 2016 Avon and Somerset Police commissioned a survey report, which was carried out by the National Counter Terrorism Security Office (NaCTSO), which identified areas of crowded spaces in key parts of the city centre that are vulnerable to terrorist attack.

1.3 Do the aims of this policy link to or conflict with any other policies of the Council?

The key objective of the project is the protection of key crowded spaces within the central core of the city centre.

2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to
2.1 What equality focussed training have staff received to enable them to understand the needs of our diverse community?	All staff members have completed the new 'Equality, Diversity and Inclusion', 'GDPR Introduction and Overview', and 'Delivering the BEST Customer Service' e-learning this year (2024), as part of the new learning zone. CCTV management staff have attended the in-person equalities training and operational staff have also been asked to attend the in-person equalities training and waiting for provision of the next round of training dates in Bath.
	The process for checking blue badges has changed since the bollards have been installed, so it a visual check of both sides of the badge, ensuring it is in date. If there are any concerns these can be raised with a manager, who can check on the Blue Badge database, or make a final decision on entry.
2.2 What is the equality profile of service users?	Residents, visitors, businesses, service providers across all equality groups and protected characteristics.
2.3 Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?	Although no customer satisfaction surveys have been undertaken for the project, no complaints have been received regarding access by Blue Badge Holders.
2.4 What engagement or consultation has been undertaken as part of this EIA and with	Details of the consultation that took place as part of the project are listed on the Bath City Centre Security consultation web pages
whom? What were the results?	16 November 2020 - 31 January 2021 Public consultation - seek views on draft proposals prior to proceeding to traffic regulation orders https://beta.bathnes.gov.uk/bath-city-centre-security-consultation

19 May - 1 June 2021

Public feedback - on 19 May 2021 the council published the findings of the independent accessibility study as well as the summary of feedback received during the public consultation that ran earlier that year. This was to give people the opportunity to examine the extensive work carried out to address access concerns raised and develop mitigations - all well in advance of the cabinet meeting discussion and final decision. If people having read the reports wished to add further comments for consideration by the Cabinet they provides these via an online feedback form. https://beta.bathnes.gov.uk/bath-city-centre-security-consultation-update

23 Sept - 14 Oct 2021

Public consultation - seek final views on traffic regulation orders https://beta.bathnes.gov.uk/citycentresecuritytroconsultation

Online consultation and bookable public info sessions 28 September, 10am to 2pm; 4 October, 3pm to 6pm; 12 October, 1pm to 5pm. These information sessions gave members of the public, including disabled people, a chance to hear directly from us about the detail of the scheme, the rationale, and also for us to be able to understand their concerns and work with them to address these where possible.

A variety of methods were used, and different formats were available (such as Easy read; Braille etc).

The proposals were shared with the Active Travel and Accessibility Forum and the Independent Equality Advisory Group.

The Council also involved disabled people and other stakeholders via focus groups (held on 15th and 17th November 2021) to create an easy-to-use system to enable Blue Badge Holders to gain access into the security zone in a vehicle. It also provided an opportunity to obtain feedback on further accessibility improvements within the security zone (e.g. dropped kerbs, raised tables etc).

Responses to the consultation included the following issues:

- accessibility, particularly in relation to people with mobility impairments
- the ability to receive deliveries within the proposed restricted zone
- · the impact on city centre businesses and residents and
- the justification for the proposed security measures.

In addition, an <u>Accessibility Study</u> was undertaken by an independent access consultant. This study included meetings with a number of disabled people to find out in detail about the way that the proposals might impact upon them, and also to determine the effectiveness of possible mitigations. The findings of the <u>Accessibility Study</u> are summarised in 3.4.

Consultation took place with B&NES internal teams to determine potential effect on Council wide services and operations. This has included the Council's Adult Social Care and Mental Health service providers. We have also consulted trusted partners/ key stakeholders and then the wider business and residential community that are likely to be affected. Comments were captured, collated and compiled within a report to Cabinet in advance of advertising Traffic Regulation Orders.

2.5 If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equality considerations within this?

Any additional issues relating to equality that are raised will be monitored, and potential mitigations will be considered where possible.

3. Assessment of impact: 'Equality analysis'

Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:

- Meets any particular needs of equalities groups or could help promote equality in some way.
- Could have a negative or adverse impact for any of the equality groups

Key questions	Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
3.1 Issues relating to all groups and protected characteristics	The provision of security measures is aimed at lessening the city centre's vulnerability to terrorist threats. The proposals aim to keep residents and visitors safe, to minimise potential causalities/ loss of life and severe impacts on the economy of Bath and potentially the wider region.	Several options were explored, all aimed to balance the need for increased security against ensuring access for disabled people and those who live within the proposed zone.
3.2 Sex – identify the impact/potential impact of the policy on women and men.	Public space CCTV has recently been upgraded across the city centre.	No issues relating to the single characteristic of sex/gender were raised within the consultation process. Within the consultation there were issues raised about safety issues for disabled women. There are potential implications in relation to perceived safety for women (both disabled and non-disabled) who are

		likely to feel more vulnerable if they are not able to park/get a taxi/be dropped off close to their destination. The access restrictions only operate between the hours of 10am to 6pm, with York St restricted between 10am and 10pm. Therefore there is access to all streets in the security zones generally during the hours of darkness. Public space CCTV has recently been upgraded across the city centre.
3.3 Pregnancy and maternity	As the streets now have less vehicles during the busiest parts of the day, there are positive impacts for parents/carers with young children who may be less at risk from passing cars. Streets with less traffic will be easier to negotiate to anyone pushing a pram/buggy. The removal of vehicles from the area will have a beneficial impact on air quality. Children who are subject to poor air quality can have whole life impacts and reduction in lung capacity of up to 15%.	There are potential implications in relation to parents/carers with small children now they are no longer able to park/get a taxi/be dropped off as close to their destination within the proposed zone. No issues have been raised now that the scheme is in operation. CCTV equipment across the city centre has been upgraded. It should be noted that as part of the sealed traffic order, drop off and pick up are possible for all vehicles from 6pm until 10am the following day on all streets, apart from York St which is 10pm to 10am the following day.
3.4 Gender reassignment – identify the impact/potential impact of the policy on transgender people	No positive impacts were identified in relation to transgender people.	No issues were raised within the consultation. Some groups are more vulnerable to hate crime. There are

Public space CCTV has recently been therefore potential implications in relation upgraded across the city centre this may to safety and perceived safety, if people reduce the risk of hate crime for this are not able to park/get a taxi/be dropped off close to their destination. protected group. It should be noted CCTV equipment across the city centre has now been upgraded and that as part of the sealed traffic order, drop off and pick up are possible for all vehicles from 6pm until 10am the following day on all streets, apart from York St which is 10pm to 10am the following day. 3.5 Disability – identify the For some disabled people, restricting Within the consultation, there were a lot of impact/potential impact of the policy on traffic to the proposed areas would have issues raised in relation to disability. In disabled people (ensure consideration of a positive impact and make them feel particular: physical, sensory and mental health more safe and secure. needs/differences) The need for access "at-all-times" for Streets with less traffic may be easier to vulnerable groups (particularly Blue negotiate for some disabled people (e.g. Badge Holders). those with mobility impairment, Before the City Centre Security project, the Stall St TRO did not allow wheelchair users, people with learning disabilities). traffic to access between 10am and 6pm daily and to reintroduce traffic The removal of vehicles from the area will into the street will have an adverse have a beneficial impact on those who impact on public safety, as the have asthma, COPD and similar expectation of those accessing the street is that vehicles are not conditions permitted. Access for residents

A full <u>Accessibility Study</u> was undertaken to understand the potential impacts and assess potential mitigations. The Access Study made the following recommendations:

- Allow Blue Badge holders to access the zone at all times (whilst this recommendation was acknowledged by Cabinet, the final decision recognised the need to balance access requirements alongside security risk). Access was therefore only applied to Cheap St, which was the main destination for BBHs requiring access e.g. Specsavers Opticians.
- For deliveries, the Council should work with customers and residents to ensure that access is as easy as possible whilst ensuring that the security objective remains in place. Following dialogue with residents, in particular St John's Foundation and St Michael's Day Centre on Hot Bath St, access requirements are now working well.

The Accessibility Study also explored several possible mitigations: -

Increase number of on-street disabled parking in adjacent

- streets (In the study, concerns were expressed about the unmanageable distances this would still involve for those with mobility impairment and the knock-on negative impacts for residents parking). A number of additional disabled bays have been provided on the periphery of the access restrictions, see Map of BBH parking
- Various other improvements (which are outside of the scope of the work for the City Centre Security proposals but might lessen negative impacts for some disabled people - such as improvements to footway surfaces, tactile surfaces, lighting, seating etc, improvements to public toilets). Mitigations will be considered on completion of the Hostile Vehicle Mitigation bollards, with funding now available within the 2025/26 and 2026/27 Local **Active Travel and Safety** Programme. This will not include Cheap St and Westgate St as improvements are to be included within proposals for a potential wider public realm scheme, although there is currently no available funding mechanism.

- Street-lighting at all the access points is considered adequate and meets highway standards.
 Lighting improvements elsewhere in the city centre is outside the scope of the City Centre Security project, but funding for other safety measures can be considered through mechanisms such as the Safer Street Fund, CIL monies or even potential provision through developer contributions.
- Improvements to public space CCTV across the city centre, has recently been made following completion of a CCTV upgrade programme.

Additional disabled parking spaces have been provided near the restricted streets, such as Westgate Buildings and Orange Grove. A series of footway improvements are proposed for the restricted and adjoining streets to improve access for older people and disabled persons. These will be considered on completion of the Hostile Vehicle Mitigation bollards, with funding available within the 2025/26 and 2026/27 Local Active Travel and Safety Programme. This will not include Cheap St and Westgate St as improvements are to be included within potential proposals

for a wider public realm scheme, although there is currently no available funding mechanism. Because of the HVM bollard installation An on-site visit has been conducted with at Hot Bath St, footways widths on officers from the Inclusive Communities adjacent sides have been reduced below Team and Highway Design Team and accessibility guidance limits. Various routes recommended to allow disabled design constraints along the street, also persons using wheelchairs or mobility meant the equipment could not be scooters to bypass the security bollards. provided at a different location. An annotated plan and photograph of the routes are shown on **Appendix A**. **3.6 Age** – identify the impact/potential Many of the issues outlined in 3.5 also For some older people, restricting traffic apply to older people. Within the impact of the policy on different age to the proposed areas could have a positive impact and make them feel more consultation, there were a lot of issues groups raised in relation to vulnerable groups, safe and secure. which include older people. In particular: This may also be the case for younger The need for access "at-all-times" age groups, where there may be positive impacts and increased safety with less for vulnerable groups (particularly Blue Badge Holders). traffic. Access for residents The removal of vehicles from the area will have a beneficial impact on air quality. There may be particular issues for older Children who are subject to poor air people who use taxis if these were no quality can have whole life impacts and longer able to access the zone to drop reduction in lung capacity of up to 15%. off. The use of taxi by Blue Badge Holders to enable drop-off within the restricted streets is permitted, as long as the passenger has a valid Blue Badge available to show CCTV operatives at the

		barrier. The system for vetting before granting access at Cheap St has worked well since implementation with little or no complaint. It was noted that particular services run by Age UK are located within the proposed zone (St Michaels Day Centre) and service users are dropped off by minibus near to the centre. Many service users have difficulties walking any distance. This was addressed during the implementation phases and Focus Groups, discussions with St Michaels Day Centre, Age UK, and St John's Foundation residents. AgeUK buses are an exempt group within the Traffic Regulation Order (TRO), allowing continued access in and out via Hot Bath St. The Council, in dialogue with St John's Foundation, have an agreed methodology for access to resident families and operational needs of the organisation, whilst retaining security objectives. Continued dialogue with St
		John's will ensure that no issues are encountered.
3.7 Race – identify the impact/potential impact on across different ethnic groups	Public space CCTV has recently been upgraded across the city centre this may reduce the risk of hate crime for this protected group.	No issues were raised within the consultation. Some groups are more vulnerable to hate crime. There are therefore potential implications in relation to safety and perceived safety, if people

		are not able to park/get a taxi/be dropped off close to their destination. Public space CCTV has been upgraded across the city centre.
3.8 Sexual orientation – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual, questioning people	Public space CCTV has recently been upgraded across the city centre this may reduce the risk of hate crime for this protected group.	No issues were raised within the consultation. Some groups are more vulnerable to hate crime. There are therefore potential implications in relation to safety and perceived safety, if people are not able to park/get a taxi/be dropped off close to their destination.
		Public space CCTV has been upgraded across the city centre. It should be noted that as part of the sealed traffic order, drop off and pick up are possible for all vehicles from 6pm until 10am the following day on all streets, apart from York St which is 10pm to 10am the following day.
3.9 Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?	No positive impacts identified.	The Abbey was consulted on the design for the bollards at Cheap St preconstruction stage and since implementation, there has been no impact on weddings and funerals.
3.10 Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	Public space CCTV has recently been upgraded across the city centre this may reduce the risk of hate crime for this protected group.	The Abbey was consulted on the design for the bollards at Cheap St preconstruction stage and since

		implementation, there has been no impact on weddings and funerals.
3.11 Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement, but is a local priority).	No positive impacts identified.	There are cost implications for some people if there is less available on-street parking (for Blue Badge Holders and non-Blue Badge Holders). On-street parking provision has been considered alongside this proposal. Following implementation, no issues have been raised by BBHs about on-street parking capacity.
3.12 Rural communities* identify the impact / potential impact on people living in rural communities	No positive impacts identified	No issues identified.
3.13 Armed Forces Community ** serving members; reservists; veterans and their families, including the bereaved. Public services are required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).	The provision of Hostile Vehicle Mitigation bollards at Cheap St, has allowed members of the armed forces community to march on the street in the knowledge they are protected from potential terrorist acts.	Whilst the provision of bollards at Cheap St has reduced the width of the road and therefore reduces the width of the marching parade, organisers have adjusted the width of the march to accommodate the barrier.
3.14 Care Experienced *** This working definition is currently under review and therefore subject to change:	Care workers visiting residents with care requirements living within any of the security zones can continue to access	Since implementation of the bollards, no issues have been raised around gaining access into any of the security zones.

In B&NES, you are 'care-experienced' if you spent any time in your childhood in Local Authority care, living away from your parent(s) for example, you were adopted, lived in residential, foster care, kinship care, or a special guardianship arrangement.	but will be required to request a permit to do so.	
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^{*}There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

^{**} The Equality Act does not cover armed forces community. However, the Armed Forces Bill (which came in on 22 Nov 2022) introduces a requirement to pay 'due regard' to make sure the Armed Forces Community are not disadvantaged when accessing public services.

^{***}The Equality Act does not cover care experienced people. B&NES adopted this group as a protected characteristic in March 2024 alongside over 80 other Local Authorities. Although we have data for care leavers and children/young people who are currently in the care of B&NES we do not have wider data on disadvantage experienced through being in care.

4. Bath and North East Somerset Council Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
Training for CCTV staff	Equalities training for CCTV and Marshalls to enable sensitive operation of the scheme, supporting disabled people's access	See section 2.1	Dan Noad	Complete, but regular updates req'd
Safety issues - Explore CCTV coverage and lighting	Consider CCTV coverage and lighting	CCTV has recently been upgraded to provide additional and improved camera equipment. Currently there are no concerns around lighting within the city centre, but if required funding for could be considered through mechanisms such as the Safer Street Fund, CIL monies or even potential provision through developer contributions.	Dan Noad	Ongoing
Access for Age UK /St John's Foundation users to St Michael's Day Centre	Meetings to take place (when)	Access arrangements agreed to enable access via Hot Bath St with appropriate security protocols	Dan Noad	Complete
Explore and increase parking provision for Blue Badge Holders adjacent to the zone	Done	See Map of BBH parking	Andrew Dunn	Complete

Explore further improvements to the public realm (such as improvements to footway surfaces, tactile surfaces, lighting, seating etc)	Focus Group took place on 17 Nov 2021. Also, further access visit with representatives of the Focus Group from RNIB and access B&NES. Design Team from CCS and Highways colleagues Parklet designs shared with Focus Group on 17 Nov 2021	Improvements to the public realm will be considered on completion of the City Centre Security project, with funding available within the 2025/26 and 2026/27 Local Active Travel and Safety Programme. This will not include Cheap St and Westgate St as improvements are to be included within proposals for a wider public realm scheme, although there is currently no funding available.	Steve Froggatt	Ongoing
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5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equality Team (equality@bathnes.gov.uk), who will publish it on the Council's website. Keep a copy for your own records.

Signed off by: Chris Major

Date: 08/04/25

(Divisional Director or nominated senior officer)

Bath & North East Somerset Council

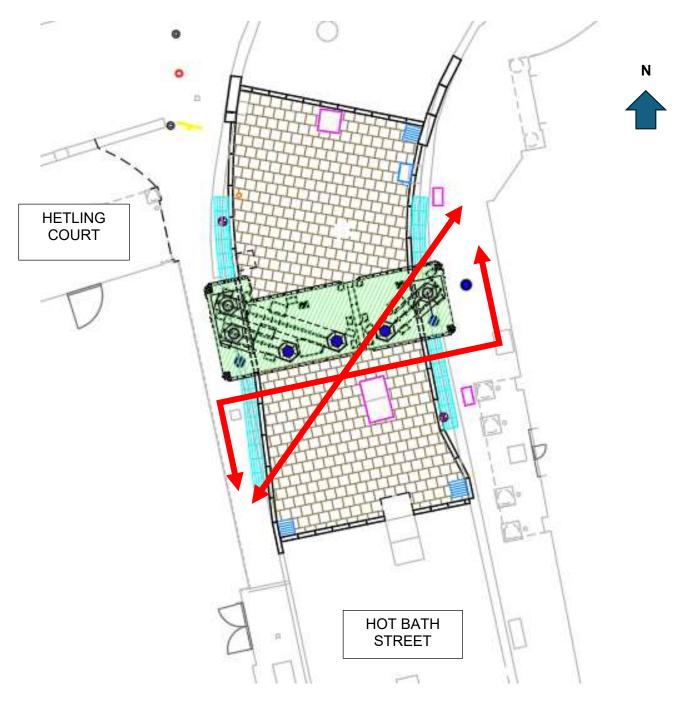
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Appendix A

<u>Hot Bath St Hostile Vehicle Mitigation Bollards</u> Alternative Routes for Disabled Persons to Avoid Narrow Footways

The routes defined by the red arrows are annotated on both the plan and photograph image below, which can be used by disabled persons using mobility scooters or wheelchairs, to avoid the narrow footways, because of the installed Hostile Vehicle Mitigation bollards provided in the road. Both routes take advantage of the smooth surfaces provided as part of the construction, making it a more comfortable ride from one side of the road to the other.

Note that the image below shows the bollards in their closed position between 10am and 6pm but are fully open between 6pm and 10am.



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