

## Equality Impact Assessment / Equality Analysis

<b>Title of service or policy</b>	Active Travel Fund Schemes
<b>Name of directorate and service</b>	Place Management – Highways, Traffic & Parking
<b>Name and role of officers completing the EIA</b>	Paul Garrod – Traffic Management & Network Manager
<b>Date of assessment</b>	04/03/22 (update)

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 different groups within the community. The primary concern is to identify any discriminatory or negative consequences for a particular group or sector of the community. Equality impact Assessments (EIAs) can be carried out in relation to service delivery as well as employment policies and strategies.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis on a policy, service or function. It is intended that this is used as a working document throughout the process, with a final version including the action plan section being published on the Council’s and NHS Bath and North East Somerset’s websites.

<b>1. Identify the aims of the policy or service and how it is implemented.</b>		
	<b>Key questions</b>	<b>Answers / Notes</b>
<b>1.1</b>	Briefly describe purpose of the service/policy including <ul style="list-style-type: none"> <li>● How the service/policy is delivered and by whom</li> <li>● If responsibility for its implementation is shared with other departments or organisations</li> <li>● Intended outcomes</li> </ul>	<p>The Highways and Sustainable Transport teams are working to introduce active travel corridors to help increase levels of walking and cycling. This is to help encourage fewer journeys to be taken by car (for those who are able) which will help improve air quality and improve health through enabling people to participate in active travel.</p> <p>This is an updated EIA and follows the December 2021 consultation on the Traffic Regulation Orders that are required to implement the active travel schemes. The previous EIA was published in November 2021.</p>
<b>1.2</b>	Provide brief details of the scope of the policy or service being reviewed, for example: <ul style="list-style-type: none"> <li>● Is it a new service/policy or review of an existing one?</li> <li>● Is it a national requirement?</li> <li>● How much room for review is there?</li> </ul>	<p>The schemes are funded from the council’s Transport Improvement Programme and the government’s Active Travel Fund, which was initially set up in May 2020 as part of the response to the pandemic.</p> <p>The government has also been directing local authorities to allocate more road space for walking and cycling through its <a href="#">Gear Change</a> document, and has set a target relating to the proportion of local journeys in towns and cities that should be taken on foot and by bicycle.</p>
<b>1.3</b>	Do the aims of this policy link to or	The Council’s Corporate Strategy clearly identifies the overarching purpose of improving people’s lives. The Strategy commits to greater use of public transport, micro mobility,

	<p>conflict with any other policies of the Council?</p>	<p>walking and cycling for some journeys to improve outcomes when preparing for the future and to focus on prevention of health inequalities. The strategy also includes the commitment to achieving climate neutrality by 2030. Transport is responsible for 29% of the carbon emissions and as such needs to make radical changes if we are to reach the target.</p> <p>The aims of the project also correspond with other policies and priorities of the council, such as the Clean Air Zone, The Journey to Net Zero, Liveable Neighbourhoods and wider improvements to public transport and the highway infrastructure (walking and cycling routes).</p> <p>The proposals have some impact on these groups and steps have been taken to mitigate for these as detailed below. It is important to highlight that the current layout and use of these roads has a negative impact on different groups of people. Upper Bristol Road and Beckford Road in particular carry high volumes of motor traffic and in some sections traffic passes very close to buildings and footways. The noise and fumes from motor traffic can have a direct impact on health and the dominance of motor traffic can cause severance issues within communities and deter some people from going out. The proposals seek to rebalance the use of the roads to make them better, safer places for everyone regardless of travel choice.</p>
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## 2. Consideration of available data, research and information

Monitoring data and other information should be used to help you analyse whether you are delivering a fair and equal service. Please consider the availability of the following as potential sources:

- **Demographic** data and other statistics, including census findings
- Recent **research** findings (local and national)
- Results from **consultation or engagement** you have undertaken
- Service user **monitoring data** (including ethnicity, gender, disability, religion/belief, sexual orientation and age)
- Information from **relevant groups** or agencies, for example trade unions and voluntary/community organisations

- Analysis of records of enquiries about your service, or **complaints** or **compliments** about them
- Recommendations of **external inspections** or audit reports

	<b>Key questions</b>	<b>Data, research and information that you can refer to</b>
<b>2.1</b>	What is the equalities profile of the team delivering the service/policy?	As the project is being delivered in its entirety by teams from within the council, the equalities profile of the team is varied and reflects the profile of the wider council.
<b>2.2</b>	What equalities training have staff received?	All staff are encouraged to attend Equalities training (this is a prerequisite for managers and senior staff). Two members of staff working on this scheme have attended Healthy Streets training. Several staff from Highways took part in training with RNIB in January 2022.
<b>2.3</b>	What is the equalities profile of service users?	The equalities profile of the users of these schemes is likely to be typical of any public highway.
<b>2.4</b>	What other data do you have in terms of service users or staff? (e.g results of customer satisfaction surveys, consultation findings). Are there any gaps?	None – data will be collected on users if the schemes go ahead, both before implementation and after. As well as general feedback, we will undertake surveys to gauge opinions.
<b>2.5</b>	What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	<p>The council's Active Travel and Accessibility Forum was consulted in December 2019 with a draft version of the proposals. Discussions have taken place with representatives of the RNIB and Bristol Disability Equality Forum. Information on the proposals were sent to Age UK, deafPlus/visionPlus and Access B&amp;NES (Bath Access Group).</p> <p>A first stage of public consultation on the proposed schemes took place in February and March 2021. The consultation results were reported to Cabinet in June 2021 where it decided that the proposals should proceed to the Traffic Regulation Order stage of consultation, with some changes to the schemes.</p> <p>Amendments to the proposals were made and a second stage of consultation took place between 2 December 2021 and 4 January 2022.</p> <p>The following issues were raised with respect to equalities (steps that can be</p>

		<p>taken to address these are identified in section 3 below):</p> <p>Proposed cycle lanes remove parking which will make it difficult to drop off or pick up elderly relatives and/or disabled members of the household or those with young children. It may also be difficult for disabled residents or visitors of homes fronting the cycle lanes to park nearby;</p> <p>Proposed locations for replacement parking in Royal Victoria Park and Midland Road causing concerns with regards to personal safety;</p> <p>Proposed design of bus stops, where cycle lane in the carriageway comes up a ramp to be level with the footway, causes safety concerns particularly with regards to mobility impaired and sight impaired pedestrians.</p>
<p><b>2.6</b></p>	<p>If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?</p>	<p>Consultation guidance issued by the government specific to the Active Travel Fund has been considered as part of our consultation process. Due to the first consultation taking place within the lockdown period, it was not possible to hold public exhibitions in person as we would normally do for such a scheme at that stage. However, considerable effort was made to provide information on the council's web site in a form that is easily understood, letters were also sent to households and businesses directly affected and different formats of the consultation material was available upon request. The consultation was published as widely as possible.</p> <p>This approach was also used for the Traffic Regulation Order (TRO) stage of consultation. ie letters were sent to all households and businesses fronting the roads affected by the proposals, emails sent to all permit holders in the parking zones affected, emails sent to all representatives on the council's Active Travel &amp; Accessibility Forum, posters put on affected streets, and press release/social media was undertaken, to spread awareness of the proposals and the consultation, and to ensure no groups were disadvantaged in being able to respond and give their views.</p> <p>Feedback on the web page content from the first stage of consultation in February and March identified that some people had difficulty understanding the technical drawings of the proposals. The web pages for the TRO stage of the consultation included much simpler and clearer graphics to help as many people understand the proposals as possible. Alt text was included to accompany the graphics.</p>

### 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 helps promote equality in some way.
- Could have a negative or adverse impact for any of the equalities groups

		<b>Examples of what the service has done to promote equality</b>	<b>Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this</b>
3.1	<b>Sex</b> – identify the impact/potential impact of the policy on women and men. (Are there any issues regarding pregnancy and maternity?)		<p>Removal of on-street parking bays in Upper Bristol Road and Beckford Road may mean some people have to park further away from where they live. Concerns about personal safety, particularly for women, have been raised.</p> <p>Adjacent roads for most of the alternative parking have street lighting and for Upper Bristol Road, Charlotte Street car park can be used overnight for Zone 6 permit holders, which has CCTV cameras and a good level of street lighting. The street lighting in Marlborough Lane is due to be upgraded. Other additional parking would be provided in a number of streets in Zone 6 which are overlooked by housing. It is acknowledged that the additional permit parking which would</p>

			be provided in Midland Road is not overlooked. If the scheme goes ahead we would therefore look to install a CCTV camera here linked to the council's main CCTV centre. A CCTV camera will also be installed as part of a separate scheme to signalise the Upper Bristol Road/Midland Road junction, which is being developed at the moment.
3.2	<b>Gender Reassignment</b> –identify the impact/potential impact of the policy on transgender people		No impact based on transgender – active travel schemes benefit all.
3.3	<b>Disability</b> - identify the impact/potential impact of the policy on disabled people (ensure consideration of a range of impairments including both physical and mental impairments)	<p>Some disabled people who use the footways along Upper Bristol Road will benefit from the improvements to every side road junction within the extents of the scheme, which will be easier and safer to cross through the use of continuous footways, improved tactile paving and dropped crossings, and the narrowing of the Marlborough Lane junction.</p> <p>The 20mph speed limit will help reduce traffic speeds and make it a safer environment for all people walking.</p>	<p>Removal of 40 parking bays in Upper Bristol Road could have a negative impact on the ability of disabled people to park near their homes. The proposals also require the removal of single yellow line parking restrictions which have space for approximately 23 parked vehicles. It is necessary to remove these in order to accommodate the cycle lanes, where parking cannot be permitted.</p> <p>Additional parking bays in neighbouring roads would be created through the removal of existing double yellow line restrictions which would provide 18 replacement spaces in the immediate area plus a further 20 in Midland Road. 14 permit bays currently shared with Pay &amp; Display users in Marlborough</p>

			<p>Lane would also be changed to permit only bays, giving greater priority to residents for on-street parking. In addition to this, the council's separate proposal of removing on-street parking permits for hotels and guest houses will free up more space for residents.</p> <p>In response to the original consultation we amended the proposed design for Upper Bristol Road to include 10 parking spaces, 8 of which would be limited to 30 minutes parking between 8am and 6pm plus 2 limited to 30 minutes between 8am and 11pm. These are intended to provide space where residents can be dropped off. The short daytime time limit means there will be a regular turn-around of use which should lead to space being regularly available. Blue Badge Holders can park in these spaces without being subject to the time limit.</p> <p>The amended proposal drawings included in the report to Cabinet in June 2021 had included a 30 minute disabled bay near the Hop Pole public house to address concerns raised by a resident in this section of the road who lived with a family member with mobility difficulties. Further consideration of the design raised issues this would cause</p>
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			<p>cyclists in having to pull out into motor traffic to pass a vehicle in the bay. Subsequently an arrangement has been made for the particular resident to use the council allotment drop off area opposite. The resident has not confirmed as to whether this is acceptable. It should be noted that the existing parking bay opposite is frequently full and therefore in the current situation it will often not be possible to park here. The loading bay design in the final proposals would be available to use for dropping off or picking up a passenger.</p> <p>There are currently no disabled parking bays in either Upper Bristol Road or Beckford Road. Under the current parking controls there is no certainty of being able to park close to home. It is acknowledged that there will be a lower likelihood of being able to park as close to their home for some residents as they do now. Residents who are Blue Badge Holders can apply to have a disabled parking bay provided in the nearest parking bay to their home, subject to meeting criteria. In the short term these would be advisory bays but would be changed to enforceable disabled bays should their use be abused.</p>
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			<p>There are 6 Blue Badges registered to people in homes in the section of Upper Bristol Road affected by the proposals. 4 of these are properties on the north side of the road of which most have access to rear off-street parking. 1 is registered to a resident living on the south side south between the junctions with Nile St and Nelson Lane. 2 are also registered to residents living on the south side between the junctions with Nile St and Little Stanhope St, where the proposals have been amended to include a parking bay on the north side of the road.</p> <p>All properties fronting Upper Bristol Road directly affected by the proposals were sent letters in February and December 2021 to advise them how to find out information about the scheme and how to submit comments.</p> <p>Within the section of Upper Bristol Road affected by the proposals there are a number of businesses with no off-street parking which may receive visitors or have staff who are disabled:</p> <ul style="list-style-type: none"> <li>• The Hop Pole public house: current nearest parking is opposite side of road; nearest parking under amended proposals is Park Lane, 250m away</li> </ul>
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			<p>via refuge island crossing.</p> <ul style="list-style-type: none"> <li>• Phase 1 Gym (and separate Physiotherapist business located within): current nearest parking space is opposite side of road; nearest parking under amended proposals is Marlborough Lane, 230m away, via Toucan crossing.</li> <li>• Army Reserve Centre: current nearest parking space is opposite side of road; nearest parking under amended proposals is Marlborough Lane, 240m away, via Toucan crossing.</li> <li>• Mr D's takeaway: current nearest parking space is same side of road 15m away; nearest parking under amended proposals is opposite side of road, 65m away via zebra crossing.</li> <li>• The Courtyard Hair Consultants: currently double yellow lines on both sides of road here; nearest parking under amended proposals is Great Stanhope Street, 67m away.</li> <li>• It is not possible to provide any other or closer parking to these properties without ending the cycle lane, which would not comply with the cycle design standards.</li> </ul> <p>It will still be possible for a vehicle to stop in the road to enable a passenger</p>
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			<p>to get in or out in both Upper Bristol Road and Beckford Road.</p> <p>People with mobility difficulties living in, visiting or going to the physiotherapist in Upper Bristol Road can currently use the parking spaces in the road that are proposed for removal. It means they would have to park further away if they drove themselves. It should be noted that these parking bays are currently well used and it is often the case that there are no spaces available, meaning that presently there is no certainty that a person with a disability or mobility difficulties can park near their destination.</p> <p>Blind or partially sighted pedestrians may have difficulty using the 'continuous footways' proposed at some of the side road junctions. Following a discussion with RNIB we will use good practice identified in a design guide from another local authority on the use of tactile paving at such junctions. There are not currently any national guidelines or standards with regards to the design of continuous footways.</p> <p>In Beckford Road, the proposals require the removal of 28 parking spaces. Most, but not all, properties in Beckford Road</p>
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			<p>have off-street parking. There are 4 Blue Badges registered to residents living in Beckford Road. 3 of these are registered to addresses which have some off-street parking and 1 to a property with no off-street parking.</p> <p>All properties fronting Beckford Road directly affected by the proposals were sent letters in February and December 2021 to advise them how to find out information about the scheme and how to submit comments.</p> <p>Disabled people, particularly blind or partially sighted pedestrians may have difficulty using the new bus stop designs, where people will have to cross a cycle lane between the bus stop waiting area and boarding/alighting from a bus. We have engaged with specific user groups about the designs and have made changes based on their feedback. These changes include tactile paving between the footway and cycle lane where they are at the same level; signs and road markings for cyclists telling them to give way to pedestrians; use of red colour surface where the cycle lane is at the same level of the footway; corduroy tactile paving across cycle lane acting as a rumble strip as cyclists approach the bus stop; a</p>
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			<p>commitment to work with bus operators if the scheme goes ahead to devise publicity that can be used to advise passengers on buses about the new bus stop layouts.</p> <p>We are proposing that if the schemes go ahead, we will continuously monitor the impacts. We will also carry out a formal review of the bus stops with the RNIB once they have been in place a number of months to assess how they have been operating, if any problems for disabled bus users have arisen and if changes need to be made. We would not implement any more of these bus stop designs in B&amp;NES in addition to those proposed in Upper Bristol Road and Beckford Road until such a review has taken place.</p> <p>Boat dwellers who moor on the nearby canal have raised concerns about the removal of parking and the difficulty this would cause those who own a vehicle that they use to get to work or take children to school.</p> <p>Although the nearest unrestricted parking would be approximately 600 metres away, any house boat dweller who has a valid Blue Badge would be able to park in one of the side roads</p>
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			which are covered by a residents' parking zone. Blue Badge holders can park in a permit bay or street without the need for a permit. These roads are closer to the parking in Beckford Road that would be removed under the proposals.
3.4	<b>Age</b> – identify the impact/potential impact of the policy on different age groups		<p>Older people who have difficulty walking or residents with young children may be affected by the removal of on-street parking. Please see comments above in relation to Disability.</p> <p>People with small children may have difficulty using the new bus stop designs, where people will have to cross a cycle lane between the bus stop waiting area and boarding/alighting from a bus.</p> <p>The design changes outlined above in relation to disabled users would also benefit people with small children.</p>
3.5	<b>Race</b> – identify the impact/potential impact on different black and minority ethnic groups		No impact based on race – active travel schemes benefit all.
3.6	<b>Sexual orientation</b> - identify the impact/potential impact of the policy on lesbians, gay, bisexual & heterosexual people		No impact based on sexual orientation – active travel schemes benefit all.
3.7	<b>Religion/belief</b> – identify the impact/potential impact of the policy on people of different religious/faith groups		No impact based on religion/beliefs – active travel schemes benefit all.

	and also upon those with no religion.		
<b>3.8</b>	<b>Socio-economically disadvantaged</b> – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances		No impact based on social-economic disadvantage – active travel schemes benefit all.  The cost of owning a motor vehicle can be a barrier to some people and active travel routes help those who may not be able to afford a car.
<b>3.9</b>	<b>Rural communities</b> – identify the impact / potential impact on people living in rural communities.		No impact to rural communities – the scheme is in an urban area.

#### 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. 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
EIA to be reviewed once the scheme has been constructed and completed, if decision is made to proceed.	To review the EIA.		Paul Garrod	Within 6 months of scheme completion
Absence of national design guidance on continuous footways.	Staff to keep themselves up-to-date on any new guidance that comes out.		Paul Garrod	Ongoing



<p>Concerns over design of 'bus stop boarders' and 'floating bus stops'</p>	<p>(1) Review experience from other local authorities as more of these bus stops are introduced nationally. Retro fit any new national guidance or standards that can be applied to schemes that have been implemented, where possible.</p> <p>(2) Review the bus stops on site with RNIB if the schemes go ahead to assess how they are working, within 6 months of scheme completion.</p>		<p>Paul Garrod</p>	<p>(1) Ongoing</p> <p>(2) Within 6 months of scheme completion</p>
<p>Ongoing monitoring</p>	<p>Staff will regularly review issues raised by members of the public to identify if there are any unintended negative impacts for particular groups</p>	<p>Issues identified will be addressed/mitigated wherever possible. All equality issues raised will be added to the EIA.</p>	<p>Paul Garrod</p>	<p>Ongoing</p>

## 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 Equalities Team ([equality@bathnes.gov.uk](mailto:equality@bathnes.gov.uk)), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.

### Signed off by:

A handwritten signature in black ink, appearing to read 'Chris Major', with a stylized, cursive script.

**Chris Major – Director of Place Management**