

Equality Impact Assessment / Equality Analysis

(updated May 2020)

Title of service or policy	Low Traffic Neighbourhood Strategy.
Name of directorate and service	Sustainable Communities; Transport Strategy
Name and role of officers completing the EIA	Nick Helps, Sustainable Transport Manager
Date of assessment	07/01/2022

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 main aim is to identify any discriminatory or negative consequences for a particular group or sector of the community, and also to identify areas where equality can be better promoted. Equality impact Assessments (EIAs) 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 (EIA) or Equality Analysis. **Not all sections will be relevant – so leave blank 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.

1. Identify the aims of the policy or service and how it is implemented.		
	Key questions	Answers / Notes
1.1	<p>Briefly describe purpose of the service/policy e.g.</p> <ul style="list-style-type: none"> ● How the service/policy is delivered and by whom ● If responsibility for its implementation is shared with other departments or organisations ● Intended outcomes 	<p>The Low Traffic Neighbourhood (LTN) Strategy aims to: reduce carbon emissions; encourage walking, cycling, wheeling & use of public transport; improve residential amenity & quality of life; and create a healthy natural environment. The Director of Sustainable Communities is responsible for developing schemes and the Director of Place is responsible for delivering these schemes on the public highway. The intended outcome is to create a more pleasant residential environment which will improve the health and wellbeing of residents across the area and contribution to the council’s Climate Emergency targets.</p>
1.2	<p>Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> ● Is it a new service/policy or 	<p>The Low Traffic Neighbourhood Strategy was adopted by the council’s Cabinet in December 2020.</p> <p>The aim of Low Traffic or Liveable Neighbourhoods is to turn streets that are noisy, polluted and dangerous into pleasant, healthy and safe places for people to live, work, and connect with others. They are a cost-effective way to reduce the dominance of motor vehicles in residential</p>

	<p>review of an existing one?</p> <ul style="list-style-type: none"> ● Is it a national requirement?). ● How much room for review is there? 	<p>areas, Schemes will be introduced that reduce through traffic whilst maintaining vehicle access to homes and businesses and without disadvantaging disabled people, particularly those with mobility impairments. Sustainable travel will be facilitated for everyday travel needs, reducing overall vehicle use, rather than just diverting motorised traffic elsewhere.</p> <p>The council's Climate Emergency Action Plan supports low traffic neighbourhoods in order to reduce carbon emissions.</p> <p>Local ward Members and local communities will be involved in the development of proposals to ensure that views of residents are central to any scheme proposed through the process of community engagement and co-design. Schemes will be implemented by the Highways & Traffic Service within the Place Management Directorate. The schemes will be closely monitored and amended as necessary.</p>
1.3	Do the aims of this policy link to or conflict with any other policies of the Council?	No

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, sex, 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

	Key questions	Data, research and information that you can refer to
2.1	What equalities training have staff received to enable them to understand the needs of our diverse community?	<p>The Sustainable Transport Manager holds a degree in Planning and a Master's degree in Transport Planning and has worked within the framework of the former Disability Discrimination Act 1995 and the Equality Act 2010 as they relate to transport, for over 25 years.</p> <p>Council Officers involved in the strategy have received equalities training and are regularly updated on equalities issues.</p>
2.2	What is the equalities profile of service users?	<p>The profile of service users could include all residents and service users of B&NES. Details regarding the profile of the district's population can be found in the Joint Strategic Needs Assessment, at https://www.bathnes.gov.uk/services/your-council-and-democracy/local-research-and-statistics</p>
2.4	Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?	<p>A public consultation was carried out between 9th September 2020 and 18th October 2020. An on-line survey was used to seek views on the draft strategy. During the consultation period, two webinars were conducted where officers and Members discussed the proposals and responded to questions from the public. Recordings can be found on at:</p> <p>https://www.youtube.com/watch?v=7lorgqE9UjA https://www.youtube.com/watch?v=GXech8bUbQM</p> <p>The online survey generated 1,575 individual responses. In response to the question 'Do you consider yourself to be a disabled person?', 4.6% said yes, 90.0% said no, with 4.4% stating that they preferred not to say. The 2011 census indicated that 7% of the B&NES population reported that long term illness or a disability affected their day-to-day activities a lot. A further 9.1% reported that their day-to-day activities were affected a little. Disabled people are therefore underrepresented in the consultation response. Responses from people who reported a disability were therefore reviewed separately to see if there were any significant differences in the results, when compared to the wider population.</p> <p>The responses to three separate questions are considered here:</p>

		<p>‘Q1 How strongly do you agree with the principle of reducing the dominance of vehicles in some busy residential areas by using more road space for safer active travel, such as walking, cycling and public transport, with the aim of improving our environment, health and wellbeing? The general population (all responses) indicated 85% either agreeing or strongly agreeing with this statement. For disabled respondents this was reduced to 69%.</p> <p>Q4 How strongly do you agree that to establish liveable neighbourhoods, it may be necessary to restrict through-traffic on certain streets (with various measures or modal filters) while also maintaining vehicle access to homes and businesses? The general population indicated 84% either agreeing or strongly agreeing with this statement. For disabled respondents this was reduced to 73%</p> <p>Q5 How strongly do you agree that certain trade-offs are required to achieve the overall aims of liveable neighbourhoods? This could include residents and visitors in some cases driving for longer to reach a main road, and also a loss of some on-street parking (where the community supports this) The general population indicated 78% either agreeing or strongly agreeing with this statement. For disabled respondents this was reduced to 58%</p> <p><i>Impact on disabled people and those with mobility issues</i></p> <p>Respondents expressed a general concern for the ability of residents with mobility issues to adapt their travel behaviour when vehicle access is restricted, as a result of LTNs. They cautioned the ability of those residents to adopt alternative travel behaviours such as walking or cycling, particularly when considering the hilly terrain in Bath.</p> <p>Some respondents felt that residents with mobility issues could have their freedom curtailed by the new measures. This would result in reduced access shops and services or limit the option to visit friends and relatives by car, prompting exclusion and isolation.</p> <p>There were also positive responses to potential measures from disabled people, particularly in</p>
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		<p>relation to improved air quality (for people with lung conditions) and reduced levels of traffic in residential areas/reduced danger in crossing such roads.</p> <p>In contrast to the under-representation of disabled people, 24% of the respondents stated that they were retired. This compares with 16% of the B&NES population classified as retired (source ONS annual population survey 2019/20).</p> <p>The consultation outcome summary report can be viewed at: https://beta.bathnes.gov.uk/sites/default/files/Liveable%20Neighbourhoods%20consultation%20outcome%20summary.pdf</p>
<p>2.5</p>	<p>What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?</p>	<p>Public consultation / community engagement work has been and will continue to be undertaken with all sections of the community in mind. Consultation responses are able to be submitted either digitally, hard copy or via telephone to the project team.</p> <p>The initial consultation in 2020 gave the opportunity for responses to be submitted either via a web-based survey or through a hard copy questionnaire. Due to Covid protocols at the time it was not possible to hold in person events. In developing the survey, consultation took place with the council's equalities team as to the relevant questions to be included to ensure that no groups were excluded.</p> <p>Following the selection of 15 priority areas by Cabinet in June 2021, a second period of public engagement was held in December 2021. The engagement has comprised: letters sent to households and businesses in the 15 areas and adjoining properties; six in-person events (covid secure); three online evening events; website with online questionnaire. Publicity included a well-reported press release and a comprehensive series of social media posts on Facebook, Twitter and Instagram. Participants were able to give their views either through a web-based mapping tool using an interactive map, email or sending in comments by letter to the project team. Paper copies of the questionnaire and maps were available by calling Council Connect and the project team offered a call-back service for residents requesting a phone call. Comments received by alternative methods (including emails and telephone conversations) have been added to the consultation and will be taken into account.</p>

		<p>AECOM has been commissioned to support the in-house team for the duration of the project and have been fully briefed on the equalities requirements. As part of the commissioned work, a separate EIA template has been developed for use in the development of each Liveable Neighbourhoods scheme. This EIA template will ensure that the specific equality issues relating to individual schemes are highlighted, and that all opportunities to promote equality and mitigate any potential negative impacts are taken. It can be viewed on the Council's EIA web page.</p>
<p>2.6</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>Community engagement and co-design is a key element of the Low Traffic Neighbourhood Strategy, including within feasibility review and implementation of proposed schemes. As part of the strategy, the Council will look to engage people who may find it difficult to take part such as disabled people, people who do not belong to organised groups, unemployed people and people for whom English is not their first language. All respondents will have a choice of submitting comments through a variety of means – including digital and non-digital options with support offered for both. Consultation materials will be made available in alternative formats on request.</p> <p>All communities across B&NES are welcome and encouraged to contribute to any engagement and consultation work across all proposals even if they are not residents of a selected Liveable Neighbourhood area. Publicity will take the form of press releases and social media posts.</p>
<p>3. Assessment of impact: 'Equality analysis'</p>		
	<p>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:</p> <ul style="list-style-type: none"> ● 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 equalities groups 	
	<p>Examples of what the service</p>	<p>Examples of actual or potential negative or adverse impact and</p>

		has done to promote equality	what steps have been or could be taken to address this
3.1	Sex – identify the impact/potential impact of the policy on women and men.	Women are more often responsible than men for ensuring that children arrive at school. Depending upon the age of the pupil, this may involve an escort trip via any of the transport modes available to them (including on foot/bicycle, by car or public transport). LTNs will make walking and cycling to school safer and more convenient. Safer neighbourhoods will promote independent travel for young people, freeing up parental time during school opening and closing hours.	<p>The issues affecting men and women in respect of transport and safety differ.</p> <p>Personal safety on public transport is also often felt to be an issue particularly for women</p> <p>Women generally have lower levels of access to cars than men. Women are also more likely than men to travel by bus.</p> <p>Personal safety in public spaces is often felt to be an issue particularly for women. It will be important to bear in mind these issues and concerns in the development of each individual scheme so opportunities to increase feelings of safety and personal security are taken.</p>
3.2	Pregnancy and maternity	See 'sex' above. LTNs aim to rebalance the dominance of private vehicles in residential areas, enabling young children to spend time outdoors without being continuously escorted by adults.	
3.3	Gender reassignment – identify the impact/potential impact of the policy on transgender people	None	Personal safety in public spaces, and being a target of hate crime is often felt to be an issue particularly for people in the trans community. It will be important to consider issues of safety and personal security in the development of individual schemes.
3.4	Disability - identify the	The LTN strategy meets the	Disabled car users/ blue badge holders may need to drive slightly

	<p>impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and mental impairments and mental health)</p>	<p>needs of disabled people by addressing barriers that they face when travelling through the public realm, including;</p> <ul style="list-style-type: none"> • decline in the quality of the public realm and communities as congestion on the highway network has resulted in the inappropriate routing of vehicles via residential areas. • Safety issues associated with high volumes of traffic in residential areas. <p>There will be opportunities to improve accessibility when individual schemes are developed (e.g. by the introduction of dropped kerbs).</p> <p>A strategic objective of the LTN is the safeguarding access for residents and the needs of disabled people who rely on transport by motor vehicle for their mobility. Central to all individual LTN schemes, will be how the needs of all community members (and those who visit the particular community where the LTN proposal is being developed) are included during the proposal design. There will</p>	<p>further to access services and/or visit friends and family (for example if some roads are made one-way).</p> <p>Mitigation will include additional disabled car parking provision adjacent to services & facilities and in other areas where required.</p> <p>Personal safety in public spaces, and being a target of hate crime is an issue for disabled people. It will be important to consider issues of safety and personal security as individual schemes are developed.</p>
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		also need to be work undertaken within each scheme to ensure the participation of particular groups including disabled people who may have specific needs. This will be achieved by involving disability groups such as Access B&NES and also the updated Transport Stakeholder Forum.	
3.5	Age – identify the impact/potential impact of the policy on different age groups	Both young people and older people who do not have access to a car will benefit from the increased convenience of walking and cycling as a result of LTNs, together with improvements to public transport.	LTNs can provide a safer and more amenable environment for walking and cycling. This will benefit both younger and older people who are more reliant on active travel to meet their daily needs and encourage more trips to switch from car to walking and cycling. Age groups that have higher car usage, such as families with young children (particularly in rural areas) who travel to school distant from their neighbourhood may be required to drive further.
		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
3.6	Race – identify the impact/potential impact on across different ethnic groups	It will be important to ensure that people from a range of ethnic backgrounds take part in consultations and are involved in scheme development. Consultation materials will be made available on request in different languages.	People from ethnic minority groups are more likely to be on lower incomes and may disproportionately live on main roads where housing is comparatively cheaper. These main roads may experience an increase in traffic and pollution as a result of an LTN, in the short term. The strategy document states that measures will not have a negative impact on the clean air plans and air quality compliance in the long term. Public transport and cycling improvements on the main roads will encourage a shift away from car use, mitigating the potential

			<p>negative effects of LTNs.</p> <p>Personal safety in public spaces, and being a target hate crime is an issue for black and minority ethnic people. It will be important to consider issues of safety and personal security in the development of individual schemes.</p>
3.7	Sexual orientation - identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people	None	<p>Personal safety in public spaces, and being a target of hate crime is an issue for LGB+ people. It will be important to consider issues of safety and personal security as individual schemes are developed.</p>
3.8	Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?	None	<p>None identified.</p>
3.9	Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	None	<p>Personal safety in public spaces, and being a target of hate crime is an issue for some faith groups. It will be important to consider issues of safety and personal security as individual schemes are developed.</p>
3.10	Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to	Low-income groups who do not access to a car will benefit from the convenience of walking and cycling as a result of LTNs, plus improvements to public transport.	<p>Communities with higher levels of deprivation may have lower levels of social capital when compared with more affluent areas, and therefore will be less able to present the case for a LTN in their area. The Council will identify and facilitate LTNs in less affluence areas, supporting those communities to submit proposals if appropriate.</p>

	<p>factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement, but is a local priority).</p>	<p>To deliver the strategy, the council will:</p> <ul style="list-style-type: none"> actively identify areas as candidates for low traffic neighbourhoods. In tandem, the Council will invite communities, via their ward Member, to put forward their own proposals for local traffic neighbourhoods in their area work with local ward Members and their communities to share information on the potential role that local traffic neighbourhoods can play and explain the potential suitability benefits and potential trade-offs. <p>The strategy document states that schemes must not have a negative impact on the clean air plans and air quality compliance in the long term. To achieve this, the council will</p> <ul style="list-style-type: none"> develop a framework to identify potential areas which may be suitable for a low traffic neighbourhood, including establishing the main and local road networks, 	<p>The strategy refers to electric bikes as one possible solution to the challenging topography of Bath for cycling. Electric bikes are comparatively expensive compared to normal pedal cycles and could be unaffordable to low-income groups. However, electric bikes could become an affordable way to travel around the city if they replace car ownership.</p> <p>The Council is working with businesses, schools and multi-academy trusts to encourage them to sign up with a Cycle to Work provider, which offers a salary sacrifice scheme for employees to purchase pedal cycles and electric bicycles.</p> <p>People on lower incomes may disproportionately live on main roads where housing is comparatively cheaper. These main roads may experience an increase in traffic and pollution as a result of an LTN. The council will develop plans to encourage cycling and public transport on main roads to ensure that overall levels of traffic will not increase.</p>
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		<p>as well as key public transport and active travel routes.</p> <ul style="list-style-type: none"> • use existing data to assess the eligibility and high-level feasibility of a low traffic neighbourhood approach • initially prioritise low traffic neighbourhood schemes following further data collection and strategic fit, taking into account the likelihood and potential impact of any traffic displacement of issues. 	
3.11	Rural communities* – identify the impact / potential impact on people living in rural communities		<p>Those living in rural areas may not have a suitable alternative to the car when travelling into Bath or the towns. As a result of an LTN vehicle access to some areas may be restricted, requiring drivers to travel slightly further to visit friends and family in residential areas.</p> <p>The council will develop plans to improve public transport access from rural areas into Bath and the towns where a LTN is being implemented.</p>

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.

4. Bath and North East Somerset Council & NHS B&NES 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
Communities with higher levels of deprivation may have lower levels of social capital when compared with more affluent areas, and therefore will be less able to present the case for a LTN in their area.	The Council will consider LTNs in less affluence areas and support those communities to develop proposals where there is local support.	<ul style="list-style-type: none"> actively identify areas as candidates for low traffic neighbourhoods in low-income areas. support these communities, via their Councillor, to put forward their own proposals for local traffic neighbourhoods in their area. 	Nick Helps	Ongoing
People on lower incomes may be disproportionately affected by an LTN if they are more likely to live on main roads that see an increase in traffic.	Assess likelihood that low incomes groups will be adversely affected by proposed LTN schemes.	<ul style="list-style-type: none"> Assess proposals against deprivation map of B&NES and identify appropriate mitigation measures including schemes to facilitate a modal shift from cars to sustainable travel. 	Nick Helps	Ongoing

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), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.

Signed off by: Sophie Broadfield, Director of Sustainable Communities

Date: 12/1/22