

Equality Impact Assessment / Equality Analysis

(Updated December 2022)

Title of service or policy	Off Street Emissions based charges 2023
Name of directorate and service	Place Management - Parking Services
Name and role of officers completing the EIA	Andrew Dunn, Team Manager – Parking Jane Whiteman Service Delivery Officer - Parking
Date of assessment	24 August 2023 - Updated November 2023

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.

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

Key questions	Answers / notes
<p>1.1 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>A review of off-street parking charges in council operated car parks has been undertaken with proposals to introduce emissions-based charges in Bath car parks due to clean air direction to help reduce the use of more polluting vehicles to secure the safer movement of pedestrian traffic on the highway by reducing the public health risks posed to pedestrians by air pollution. The new charges will help incentivise the displacement of more polluting vehicles outside the city centre to more appropriate locations, such as the park and rides.</p> <p>The new charges will be based on the existing prices introduced on 1st November 2022 https://beta.bathnes.gov.uk/find-car-parks-bath with drivers of more polluting vehicles charged progressively more for their parking, mirroring the structure of emission-based residents parking permits as per DVLA VED bands.</p> <p>There will be no change to the charges for drivers of EV vehicles or non-diesel fuelled vehicles that emit up to 130g/km of CO2.</p>

	<p>Season tickets will also be subject to emissions-based charging for new customers. Existing season ticket customers will have their charge discounted to ensure their charge remains the same as it is currently (and not emission based) for the first 12 months following the large price rise they experienced in November 2022 in order to help them plan and adapt to the new charge, particularly as many residents in central Bath without access to private parking or on street permits rely on a season ticket for their needs.</p> <p>Delivery will be achieved in conjunction with colleagues in Highways to develop and implement required Traffic Regulation Orders and will be facilitated by a separate project on the forward plan of works to replace obsolete pay and display equipment.</p>
<p>1.2 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 review of an existing one? ● Is it a national requirement?). ● How much room for review is there? 	<p>There is no national requirement and as such there is room for review. However, although not the purpose of these proposals, it is noted that by implementing these changes it should help in addressing the climate emergency by encouraging the use of sustainable transport and active travel. This also therefore compliments the 'Journey to Net Zero' plan, reducing the environmental impact of transport and which was adopted by the Council in May 2022.</p> <p>Private car parks are not affected by these proposals.</p>
<p>1.3 Do the aims of this policy link to or conflict with any other policies of the Council?</p>	<p>This policy meets the Councils core policies of tackling the climate and ecological emergencies.</p> <p>It is also in line with Transport Polices, the Parking Strategy, and is consistent with the objectives of the Clean Air Zone, the prioritisation of active travel and the 'Journey to Net Zero' plan.</p> <p>https://beta.bathnes.gov.uk/document-and-policy-library/balancing-your-needs-parking-strategy-bnes</p> <p>https://beta.bathnes.gov.uk/bath-clean-air-zone</p> <p>https://beta.bathnes.gov.uk/active-travel</p>

	<p>https://beta.bathnes.gov.uk/active-travel-schemes-overview</p> <p>https://beta.bathnes.gov.uk/journey-net-zero/why-do-we-need-journey-net-zero</p> <p>Redevelopment within the historic core has also seen changes to the availability of parking and the promotion of parking out of the city centre. Prioritising sustainable transport such as the park and ride service ensures that the city, as a popular visitor destination and double UNESCO world Heritage site remains accessible.</p>
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2. Consideration of available data, research and information

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>All staff within Parking Services have completed Equalities training during their induction to ensure compliance with corporate standards.</p> <p>A structured training plan is in place for all new staff to ensure they do receive equalities training in a timely manner after commencing employment. The team also receive Equalities training provided by our Corporate Equalities Officer to maintain and refresh knowledge.</p>
2.2 What is the equalities profile of service users?	<p>Anyone who requires parking within the geographical area of Bath and North East Somerset can potentially purchase parking, therefore the service users are likely to be representative of the national population that travel by private vehicle. http://www.bathnes.gov.uk/services/your-council-and-democracy/equality-and-diversity/equality-mapping</p>
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?	<p>Parking Services also uses the Voicebox survey to measure customer satisfaction. The results of the Voicebox 31 survey (2022/23) record 67% of respondents rating the provision and operation of off-street parking areas as acceptable to good.</p>

<p>2.4 What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?</p>	<p>The “Balancing your Needs” parking strategy was consulted on in 2017 and adopted in 2018. The parking strategy set out the key policy direction and objectives for the service until 2028.</p> <p>The emission-based car parking charges have been developed in cooperation with Parking Services, the Director of Place Management and Cabinet members, and proposed for 2023/24 as part of the Council's budget setting process, as approved full Council in February 2023.</p> <p>This EIA and the proposals were presented to the B&NES Independent Equalities Advisory Group on 13 June 2023 and feedback has been incorporated into this assessment.</p> <p>This EIA and the proposals were presented to the Climate Emergency and Sustainability Policy Development and Scrutiny panel on 6 July 2023, no amendments were made to this EIA.</p> <p>This EIA and the proposals were presented to the general public as part of the statutory consultation process for Traffic Regulation Orders (TROs) in line with the Road Traffic Regulation Act 1984 across a 21 day period from 13 July 2023 to 3 August 2023 for feedback. No amendments were made to this EIA.</p>
<p>2.5 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>Parking charges are to be set within the Council's Traffic Regulation Orders and changes to these require a Statutory Notification period of 21 days for respondents to consider and provide feedback.</p> <p>All members of the public can provide feedback on the proposals, indicating whether they support; partially support; or object to them. This includes feedback if a respondent feels there is an equalities issue that has not been identified or considered. The Council is mandated to consider such objections.</p> <p>The consultation will be publicised via local press, social media and our website where people can view the information and complete the online survey to ‘Have Their Say’. We will also proactively contact customers where contact details are held in line with Data Protection requirements. The consultation received over 8500 page views, with approx. 6500 of these being unique visits. 1692 responses were received and a report has been produced to accompany this consultation assessment.</p> <p>Web pages will meet the required Accessibility standards.</p>

	Consultation information will make known alternative formats are available upon request and who to contact. This includes a printed survey, or information in another format including audio, braille, large print or in another language.
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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 equalities groups

	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		
3.2 Sex – identify the impact/potential impact of the policy on women and men.		<p>Only car park users with higher polluting vehicles will pay higher emissions-based charges in Bath car parks. On Street parking charges are not affected by these proposals.</p> <p>Car parks (and Park & Ride sites) provide adequate lighting (noting fees for electricity have increased). It is also a requirement to have regard to conservation areas and restrictions that may be imposed to limit ‘light spill’.</p> <p>CCTV is present at Bath car parks including Avon Street, Charlotte Street, Guildhall, Manvers Street, Kingsmead</p>

	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
		<p>Square, Sports & Leisure and Cattle Market Road car parks. CCTV provision is currently under review and will include identification of any potential for improvements. There is a choice of other alternative options for travel, for example public transport, this including Park & Ride Services (CCTV present at all locations). Other private car park provision is available in Bath.</p>
3.3 Pregnancy and maternity	<p>Any improvements in air quality that result from a reduction in more polluting vehicles entering central areas will be of benefit to those that are vulnerable to poor air quality.</p>	<p>Women on maternity leave may have reduced income and need to access health services in Bath. Only car park users with more polluting vehicles will pay higher emission-based charges in Bath car parks.</p> <p>There is a choice of other alternative options for travel, for example public transport, this including Park & Ride Services. Other private car park provision is available in Bath.</p> <p>On Street parking charges are not affected by these proposals.</p>
3.4 Gender reassignment – identify the impact/potential impact of the policy on transgender people		<p>Only car park users with higher polluting vehicles will pay higher emission-based charges in Bath car parks. On Street parking charges are not affected by these proposals.</p> <p>Car parks (and Park & Ride sites) provide adequate lighting (noting fees for electricity have increased). It is also a requirement to have regard to conservation areas and restrictions that may be imposed to limit ‘light spill’.</p> <p>CCTV is present at Bath car parks including Avon Street, Charlotte Street, Guildhall, Manvers Street, Kingsmead</p>

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<p>3.5 Disability – identify the impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and mental impairments and mental health)</p>	<p>Any improvements in air quality that result from a reduction in vehicles entering central areas will be of benefit to those that are vulnerable to poor air quality.</p> <p>Dedicated parking for Blue Badge holders is available adjacent to the bus stop at all three park and ride sites and enforcement is undertaken to prevent abuse by those who are not Blue Badge holders.</p> <p>Blue badges can be used on street in paid for parking and permit bays for no time limit.</p>	<p>Only car park users with more polluting vehicles will pay higher emission-based charges in Bath car parks. On Street parking charges are not affected by these proposals.</p> <p>Proposals may impact a Blue Badge holder wishing to use an off-street parking place included within these proposals through an increased parking charge. However, all on street pay and display bays and resident permit holder bays within the geographical area of Bath & North East Somerset Council are free to use by a Blue Badge holder providing a valid blue badge is clearly displayed.</p> <p>A Blue badge also allows up to 3 hours of parking when parking on yellow lines where no loading restrictions are in place.</p> <p>It should be noted that there are other changes taking place related within Bath city centre for security purposes which restrict motor vehicle access to some roads within the city during the hours 10.00 to 18.00/2200. Additional work has been undertaken to consider some of the issues experienced by Blue Badge holders as a result of these</p>

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		<p>road closures and to ensure alternative locations where a Blue Badge can be used for free on street parking are available. Further information can be viewed at:- https://beta.bathnes.gov.uk/citycentresecurityworks</p> <p>View our map of Blue Badge parking bays and public seating in Bath City Centre online at https://beta.bathnes.gov.uk/media/4479</p> <p>New pay and display equipment required to support emission-based charging compliant with requirements of the Equalities Act and site assessment by the supplier will include feedback about accessibility around the machine, including how the location could be improved to help wheelchair users access the machines. Mitigations will be progressed on a case-by-case basis and will ensure machines located by disabled bays are prioritised, with appropriate signage included to help direct customers.</p>
<p>3.6 Age – identify the impact/potential impact of the policy on different age groups</p>	<p>All concessionary pass holders can use the Park & Ride service free of charge upon use of their pass after 09.00 and are therefore not affected by any rise in car parking charges.</p>	<p>Only car park users with more polluting vehicles will pay higher emission-based charges in Bath car parks. On Street parking charges are not affected by these proposals.</p> <p>There may be an adverse impact on some users where only cashless payment options are available, for example at Broad Street and Green Park Road car parks and payment cannot be accepted by cash. Recent data published by Ofcom in 2022 shows that 97% of the UK population have access to a mobile phone, with this dropping to 90% for a smartphone. Ofcom data identifies that for those aged 65 and over the percentages fall 90% and 68% respectively.</p>

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		<p>In addition to the smartphone app, MiPermit may be used on any mobile phone using the text service or via telephone to the MiPermit Customer Service team (Monday to Friday 8am – 6pm, Saturday 8am – 4pm and Sunday from 10am – 4pm). Customers may also create a stay in advance from a landline (via the Customer Service team) or via a home PC. Whilst this does not reserve a parking space, the park and rides sites typically operate below capacity ensuring a space will be available when they arrive, the only exception to this is during the extreme peak periods such as the Christmas Market when demand exceeds capacity.</p> <p>Card payment terminals will now be widely deployed across council car parks where electricity supplies to equipment allow to increase the flexibility of payment options including those who may not have access to a mobile/smart phone.</p> <p>We will continue to assess the impact of emission-based lookups on the power status of machines operating on battery power (charged by solar panels). Installation of card terminals in battery powered machines will be assessed on a location-by-location basis where usage/power drain/and charge status allow.</p>
<p>3.7 Race – identify the impact/potential impact on across different ethnic groups</p>	<p>The council readily advertises the presence of emission-based variable charges across its website and paid car parks where charges apply so that those travelling to the city with foreign registered vehicles can plan appropriately to ensure that those that remain price sensitive can choose alternative options, such as the Park and Ride Service, where parking is free for bus service users.</p>	<p>Only car park users with more polluting vehicles will pay higher emission-based charges in Bath car parks. On Street parking charges are not affected by these proposals.</p> <p>It's important to note that the aims of the emission-based variable charges are to improve air quality within the city centre and protect the health, safety and wellbeing of vulnerable people that are more directly affected by air pollution and poor air quality.</p>

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		<p>Vehicle information and not any protected characteristics of an individual forms the basis of the variable charge; however, it is reasonable to assume that those with a foreign number plate are more likely to be foreign drivers and therefore may be indirectly discriminated. This must be considered within the context of the legitimate aim of the policy and its objectives relating to air quality and protecting vulnerable people.</p> <p>The variable charges are themselves complex to communicate, particularly as many operators (both council and private) continue to use non variable tariffs in their public car parks. To operate this variable charge effectively and work towards the achievement of the outcomes the operation of the scheme and the calculation of the charges should be automatic to allow users to determine their charges quickly and simply, and the use of nationally held DVLA data helps to achieve this.</p> <p>The lack of any reliable data held within the UK on foreign registered vehicles prevents the accurate determination of the emission status of a vehicle registered outside the UK.</p> <p>It is not considered a proportionate response (technically or administratively) for a single Local Authority to manage and maintain a DPA compliant database locally of foreign registered vehicles so that motorists choosing to bring their own private vehicle into Bath city centre from their country of residence, rather than travel more sustainably, can pre-register and obtain a lower variable charge. Such a mechanism would also be challenging for visitors should other schemes become operative requiring action for individual city's. Its should also be noted that other more</p>

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		<p>sustainable transport options are in place locally to help motorists travelling to the city centre avoid these charges.</p> <p>Promotion of the variable charges, and the basis for the charge (including the impact on foreign registered vehicles), continues to be well publicised so that those planning trips to Bath may make an informed choice for their mode of transport and consider alternative options for travel, for example public transport. This includes the 7 days a week Park & Ride Services, operating from three locations accessible to the North, West and South of the city centre (CCTV present at all locations).</p> <p>Customers are not required to use council operated car parks in order to park a vehicle in Bath city centre, with other private car parks available in the city centre to motorists looking to avoid the emission-based variable charge.</p> <p>The council has a published and accessible complaints process to allow customers to provide feedback and ensure that concerns raised are considered on a case-by-case basis. Contact details for Parking Services are publicised across all car parks, including those with variable charges for the convenience of all customers should they have specific concerns to raise.</p>
<p>3.8 Sexual orientation – identify the impact/potential impact of the policy on</p>		<p>No known impact</p>

	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
lesbian, gay, bisexual, heterosexual people		
3.9 Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?		No known impact
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.		<p>Only car park users with more polluting vehicles will pay higher emission-based charges in Bath car parks. Only car park users with higher polluting vehicles will pay higher emission-based charges in Bath car parks.</p> <p>There is a choice of other alternative options for travel, for example public transport, this including Park & Ride Services. Other private car park provision is available in Bath.</p> <p>On Street parking charges are not affected by these proposals.</p>
3.11 Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background,	The Council provides a Park and Ride service that is of benefit to the socio-economically disadvantaged as the service allows motorists to travel by private vehicle to the edge of the city and benefit from the use of convenient and sustainable transport directly into the city centre that is typically cheaper than the cost of parking in the city.	<p>Whilst there is no intended impact based on socio-economically disadvantage- all who qualify can purchase parking, increased charges could have an impact on those who are economically disadvantaged.</p> <p>It may be that lower income households have an older car that may emit more carbon dioxide, and therefore pay more to park in Bath council owned car parks.</p>

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<p>educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement, but is a local priority).</p>		<p>However, the costs of parking stays equate only to a small percentage of the annual costs of running a motor vehicle.</p> <p>Other more sustainable options including active travel are also available.</p> <p>People who are of state Pension Age may apply for a free Older Persons Bus Pass.</p> <p>The Park and Ride service provides a range of discounts that include;</p> <ul style="list-style-type: none"> • English National Concessionary Pass holders can travel for free after 09.00 Monday to Friday. • A group of two adults may purchase a discounted fare after 09.30 Monday to Friday. • Regular service users can benefit from discounts when purchasing 10 single journeys one transaction (for use anytime). • up to 5 children (under 16) can travel for free with each fare paying adult. <p>https://travelwest.info/park-ride/</p>
<p>3.12 Rural communities* identify the impact / potential impact on people living in rural communities</p>	<p>The Council provides a Park and Ride service which is of benefit to those living in rural communities without access to a suitable service that need to visit the centre of Bath.</p> <p>The Park and Ride service allows these motorists to travel by private vehicle to the edge of the city and benefit from the use of convenient and sustainable transport directly into the city centre</p>	<p>Whilst there is no intended impact for those living in rural communities, the costs of parking stays equate only to a small percentage of the annual costs of running a motor vehicle and therefore the impact is small.</p> <p>Other more sustainable options including the Park and Ride are available 7 days a week</p> <p>https://travelwest.info/park-ride/</p>

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	that is typically cheaper than the cost of parking in the city.	
<p>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).</p>		No known impact.

*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.

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
EIA to be reviewed annually or if significant changes happen within the service provision.	To review the EIA		Team Manager - Parking	1 st April 2024
Issues raised by: <ol style="list-style-type: none"> 1. New elected members via the Informal Cabinet process 2. Council's Independent Equalities Advisory Group 3. The Climate Emergency and Sustainability Policy Development and Scrutiny panel 4. Consultees through statutory consultation due to take place July/August 2023 	Staff to review feedback and identify any equalities issues and actions required as necessary.	Completion of review of feedback: <ol style="list-style-type: none"> 1. Completed 13/6/2023 2. Completed 13/6/2023 3. Completed 6/7/2023 4. Completed 12/8/2023 	Project lead	One month after engagement ends

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: Chris Major, Director of Place Management
senior officer)

(Divisional Director or nominated

Date: 16/11/2023