

Appendix E - Equalities Impact Assessments

Equality Impact Assessment / Equality Analysis

(updated November 2022)

Title of service or policy	Entry Hill Area RPZ Consultation
Name of directorate and service	Place - Environmental Services – Traffic Management
Name and role of officers completing the EIA	Helen Holm, AECOM
Date of assessment	21 November 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 introduction of a residents’ parking zone will facilitate the achievement of the strategic outcomes of local transport policy by reducing congestion and vehicle intrusion into neighbourhoods, and particularly residential neighbourhoods. It will also improve air quality by ensuring NO2 targets are met in the shortest possible time through a major shift to mass transport, walking and cycling in order to secure the safer movement of pedestrian traffic on the highway by reducing the public health risks posed to them by air pollution.</p> <p>Visitor permits are available to residents living in residents’ parking zones. In new zones since 2019 only digital visitor permits are available; however, access to paper permits is considered on a case by case basis to support the needs of vulnerable residents.</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 review of an existing one? ● Is it a national requirement?). ● How much room for review is there? 	<p>In 2020, we consulted on our policy for the introduction of Liveable Neighbourhoods in Bath and North East Somerset.</p> <p>The aim of a Liveable Neighbourhood is to reduce the dominance of vehicles in residential areas, particularly through-traffic, whilst maintaining vehicle access to homes and businesses. This can be done through a range of measures including vehicle restrictions, traffic calming, one-way streets, and residents’ parking zones.</p>

		<p>Bath & North East Somerset Council has received requests to implement a new Residents' Parking Zone (RPZ) within the Entry Hill area of Bath. This RPZ aims to prioritise on-street parking for residents and provide accessible parking near social hubs including pubs, schools, businesses, and local charities. A full summary of the proposals was available online throughout the consultation period at www.bathnes.gov.uk/rpztoconsultations</p> <p>The introduction of an RPZ will deter parking by non-residents who use the area to park and then walk into the city centre, or to other facilities in the neighbouring areas, or where parking may be limited, restricted, or charged for.</p>
1.3	Do the aims of this policy link to or conflict with any other policies of the Council?	The aims of this proposal aligns with the objectives of the council's Transport and Parking Strategies, and are consistent with other priorities of the Council such as the Climate Emergency, by providing a deterrent to commuter parking in a busy residential area, managing parking on street by limiting the number of available permits and not providing permits to residents with available off-street parking.
<p>2. Consideration of available data, research and information</p>		

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?	All staff within Parking Services and Traffic Management have completed Equalities training during their induction to ensure compliance with corporate standards. 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 and this also received regular refresh using the corporate programme. Some staff have also undertaken a 'Healthy Streets' course.
2.2	What is the equalities profile of service users?	Service users are the residents and visitors to Entry Hill Area. Residents living with a zone are entitled to purchase a permit (subject to eligibility and controls on numbers) where they own a qualifying vehicle; however, as the permit authorises parking on the highway which impacts network congestion and air quality, the impact of the policy extends to all road users, including pedestrians.
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?	Parking Services also uses the Voicebox survey to measure customer satisfaction. The results of the Voicebox 28 survey (2019) record 76% of respondents rating the provision and operation of parking permits as acceptable to good.

2.5	<p>What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?</p>	<p>This EQIA is based on the outcomes of the Parking Strategy and the Transport Strategy, whilst also drawing on results from Operator surveys where these results are not in conflict with the wider strategic objectives.</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>A first stage of consultation on the proposed RPZ was undertaken in May 2022. In total, there were 186 responses to the proposed Residents Parking Zone. 184 of these came through the online questionnaire with two replying by letter or email.</p> <p>139 responses were from within the proposed Zone with a further 47 from outside the area, one respondent did not state their location.</p> <p>Over half (61%) of all respondents’ objected to the proposals for the Residents Parking Zone with just under a quarter (22%) supporting them. A quarter (25%) of those who live in the Parking Zone supported the proposals and just over half (57%) objected to them. Around one in ten (13%) of those living outside the Parking Zone supported the proposals.</p>
2.6	<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>Charges are to be set in line with Council policies, within the Council’s Traffic Regulation Orders, which require a statutory notification period. Persons are welcome to lodge objections if they feel there is an equalities issue to be addressed and the Council is mandated to consider such objections.</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 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	Sex – identify the impact/potential impact of the policy on women and men.		No impact – all who qualify are able to purchase parking permit within the proposed RPZ area.
3.2	Pregnancy and maternity		No impact – all who qualify are able to purchase parking permit within the proposed RPZ area.
3.3	Gender reassignment – identify the impact/potential impact of the policy on transgender people		No impact – all who qualify are able to purchase parking permit within the proposed RPZ area.
3.4	Disability - identify the impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and mental impairments and mental health)	Residents who are Blue Badge holders and who meet qualifying criteria can apply for a disabled parking bay to be marked on the highway near their home. This service is available regardless of whether a Residents' Parking Zone is in place.	The on street element of the permit management scheme does not impact on people with disabilities as they are currently entitled to park in all on street residents' parking bays within the geographical area of Bath & North East Somerset Council without displaying a residents parking permit provided a valid Blue Badge is clearly displayed. Customers who do not qualify for a Blue Badge but who may have difficulty accessing/using online/App based services may contact MiPermit for assistance 7 days a week by telephone. Blue Badge holders are permitted to park on yellow lines for up to 3 hours in accordance with the provisions of the Blue Badge Rights and Responsibilities scheme https://www.gov.uk/government/publications/the-blue-badge-scheme-rights-and-responsibilities-in-England . This also allows Blue Badge

			<p>holders to park for an unlimited time in on street pay and display bays located across the city centre.</p> <p>Disabled residents who meet qualifying criteria can apply to have a disabled parking bay marked on the road near to their home if they do not have any suitable off-street parking.</p> <p>The proposed RPZ may help residents with disabilities park closer to their homes because it prioritises parking for residents over others looking for parking space.</p>
3.5	Age – identify the impact/potential impact of the policy on different age groups	Previous feedback from council customers has told us that some older customers find digital systems more difficult to access and/or use. The addition of half day paper permits will provide greater flexibility and value for those not able to use digital permits.	Customers who have difficulty accessing/using online/App based services may contact MiPermit by telephone for assistance 7 days a week.
3.6	Race – identify the impact/potential impact on across different ethnic groups		No impact based on race – all who qualify are able to purchase parking permits within the proposed RPZ area.
3.7	Sexual orientation - identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people		No impact based on sexual orientation – all who qualify are able to purchase parking permits within the proposed RPZ area.
3.8	Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?		No impact based on sexual orientation – all who qualify are able to purchase parking permits within the proposed RPZ area.

3.9	<p>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>		<p>No impact based on religion – all who qualify are able to purchase parking permits within the proposed RPZ area or will have access to dual use bays.</p>
3.10	<p>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).</p>	<p>The addition of half day paper permits will provide greater flexibility and value for those not able to use digital permits. A Distributional Impact Assessment was undertaken to assess the impact of new vehicle emission based resident permit charges on relevant socio-economic groups. This assessment identified no disproportionate impact on areas that are more deprived compared to those that are less deprived. All areas were shown to be equally impacted by increases in permit cost. However, it's noted that whilst there is no disproportionate impact to more deprived areas, it's acknowledged that individuals living within these areas could be impacted more significantly by an increase in costs than those in less deprived areas.</p>	<p>Whilst there is no intended impact based on socio-economically disadvantage, all who qualify can purchase permits within the proposed RPZ area. However, the cost of permits could have an impact on those who are economically disadvantaged. This impact has been considered against the wider needs of vulnerable residents and pedestrians who are more at risk from the negative health impacts from high levels of pollution caused by vehicles. The cost of permits has been considered. Even with the higher costs attached to more polluting vehicles, the cost of a permit equates only to a small percentage of the annual costs of running a motor vehicle.</p> <p>Under the on-street parking and permit policy, the annual permit cost can vary depending on the vehicle's emissions. As a guide, a permit for an average eight-year-old 1.6L petrol or diesel family car would normally cost in the range of £100 to £125 per year. This works out at about 34 pence a day. Permits for smaller, newer cars would typically be less. Residents can also purchase visitor permits regardless of whether they own a permit themselves. To help manage the costs of permits, and to ensure that money is not wasted when permits are not required,</p>

			permits can now be purchased in durations of 1, 3, 6 and 12 months
3.11	Rural communities* – identify the impact / potential impact on people living in rural communities		The proposals introduce an RPZ in a residential area primarily focussed on discouraging commuter parking. This may impact commuters from nearby rural areas, but may also provide an incentive to use alternate modes of transport where available

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
EIA to be reviewed annually or if significant changes happen within the service provision.	To review the EIA		Project Lead	
Issues raised by consultees through engagement or consultation exercise	Staff to review feedback and identify equalities issues and actions required as necessary.	Completion of review of feedback	Project lead	After engagement ends and prior to final decision on the proposals.

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 or nominated senior officer)

Date: 21/11/2022