

Equality Impact Assessment / Equality Analysis

(updated October 2024)

Title of service or policy	Oldfield Park and Westmoreland RPZ ETRO
Name of directorate and service	Capital delivery and project management
Name and role of officers completing the EIA	Cathryn Brown, Senior Project Manager
Date of assessment	October 2024

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>In 2020, the Council agreed the policy for 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>The introduction of an Experimental Traffic Regulation Order (ETRO) provides a mechanism to trial interventions and received public feedback to inform if the intervention should be modified or made permanent.</p>

		<p>The implementation of the RPZ and ETRO has been managed by the Capital Delivery and Project Management Service with support from Highways and Parking Services.</p>
<p>1.2</p>	<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>There is no national requirement and as such there is room for review, noting that proposals must be taken to public consultation in line with the statutory process for TROs.</p> <p>Historically, the Council has received requests to implement a RPZ in the Oldfield Park and Westmoreland area to prioritise on-street parking for residents, and to help reduce the number of non-resident visitors driving around local roads, seeking on-street parking.</p> <p>After extensive consultation, a RPZ was introduced in August 2023. Prior to implementation the Council received representation from local businesses and organisations, expressing concern that the RPZ could have a detrimental impact on their business and for staff retention and recruitment.</p> <p>Following collaboration with the Oldfield Park Community Alliance (a local group of businesses), it was agreed to introduce approximately 60 additional limited waiting and dual use parking bays to support businesses as the RPZ became embedded through the introduction of an ETRO. This would allow public consultation to be take place on the additional parking bays to inform a decision on whether they should be made permanent.</p> <p>Although not the purpose of these proposals, it is noted that by implementing these changes it should help in addressing the climate and ecological emergency by encouraging the use of sustainable transport, active travel, and reducing use of more polluting vehicles. This also therefore compliments</p>

		<p>the 'Journey to Net Zero' plan, reducing the environmental impact of transport and which was adopted by the Council in May 2022.</p>
<p>1.3</p>	<p>Do the aims of this policy link to or conflict with any other policies of the Council?</p>	<p>This policy aligns to the core aims of the council's corporate strategy; its three principles; and the following four priorities:</p> <ul style="list-style-type: none"> • Healthy lives and places • Clean, safe and vibrant neighbourhoods. • More travel choices. • Cultural life <p>The aims of the Liveable Neighbourhood programme 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

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 the Project Team, 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.

		<p>Some staff have also undertaken a 'Healthy Streets' course.</p> <p>Customer facing employees in Parking Services receive Equalities training provided by the council's Corporate Equalities Officer to maintain and refresh knowledge.</p>
2.2	What is the equalities profile of service users?	<p>Service users are the residents, businesses, organisations and visitors to Oldfield Park and Westmoreland. 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.</p> <p>http://www.bathnes.gov.uk/services/your-council-and-democracy/equality-and-diversity/equality-mapping</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>The recent public consultation on the ETRO provides feedback from users on their view of the additional bays.</p> <p>Parking Services also uses the Voicebox survey to measure customer satisfaction. The results of the Voicebox 32 survey (2023/24) record 57% of respondents expressed a satisfied or neutral view to the provision and operation of on-street parking.</p>
2.5	What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	<p>This EQuIA uses information from the recent public consultation and also from stakeholder engagement carried out during 2023 within the Oldfield Park and Westmoreland wards.</p>

2.6	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>Charges are to be set in line with Council policies, within the Council's Traffic Regulation Orders, which require a statutory notification period.</p> <p>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> <p>Web pages will meet the required Accessibility standards.</p> <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, and support will be made available to respondents that require assistance in submitting a response.</p>
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3. Assessment of impact: 'Equality analysis'		
	<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 has done to promote equality</p>
		<p>Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this</p>
3.1	Issues relating to all groups and protected characteristics	See below.
3.2	Sex – identify the impact/potential impact of	No impact – anyone is eligible to access the additional parking bays.

	the policy on women and men.		
3.3	Pregnancy and maternity	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.	Women on maternity leave may have reduced income and need to access health services in the area. The addition of more limited waiting bays increases the availability of free parking for those accessing services.
3.4	Gender reassignment – identify the impact/potential impact of the policy on transgender people		No impact – anyone is eligible to access the additional parking bays.
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>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.</p> <p>Any improvements in air quality that result from a reduction in vehicles entering residential streets, will be of benefit to those that are vulnerable to health conditions relating to poor air quality</p> <p>Blue badges can be used on street pay and display or time limited bays with no time</p>	<p>People with disabilities are entitled to park in all on street residents' parking bays, dual use bays and limited waiting bays within the geographical area of Bath & North East Somerset Council provided a valid Blue Badge is clearly displayed.</p> <p>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.</p> <p>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-</p>

		<p>limit, or on double and single yellow lines for up to 3 hours.</p> <p>Blue Badge holders that live within an RPZ may apply for an on-street resident parking permit free of charge (in line with permit entitlement limitations of a property).</p>	<p>blue-badge-scheme-rights-and-responsibilities-in-England . This also allows Blue Badge 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>It is hoped that the RPZ will help residents with disabilities park closer to their homes, because it prioritises parking for residents over others who are looking for parking space.</p> <p>Additional parking bays for use by all motorists increases accessibility to local services</p>
<p>3.6</p>	<p>Age – identify the impact/potential impact of the policy on different age groups</p>	<p>Any improvements in air quality that result from a reduction in vehicles entering residential streets will be of benefit to those that are vulnerable to poor air quality, particular the very young and elderly.</p> <p>All concessionary pass holders can use the Park & Ride service in Bath 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>Customers who may have difficulty accessing/using online/App based services for parking permits may contact MiPermit for assistance 7 days a week by telephone.</p> <p>The council will provide paper visitor permits to vulnerable residents that are unable to access digital permits through MiPermit. To provide greater flexibility for these vulnerable residents, the council introduced a half day paper permit.</p>

		<p>Community transport schemes operate across Bath and North East Somerset to provide safe, accessible transport for people who cannot use public transport due to disability, age or lack of access to services. More information on these can be found online at https://livewell.bathnes.gov.uk/community-transport</p> <p>People of qualifying age, or who have certain disabilities, can obtain a free Diamond Travelcard which will enable free bus travel on all local bus services, or discounted travel on community travel schemes. https://beta.bathnes.gov.uk/applying-free-bus-pass-diamond-travelcard</p>	<p>Additional parking bays for use by all motorists increases accessibility to local services</p>
<p>3.7</p>	<p>Race – identify the impact/potential impact on across different ethnic groups</p>		<p>No impact – anyone is eligible to access the additional parking bays.</p>

3.8	<p>Sexual orientation - identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people</p>		<p>No impact – anyone is eligible to access the additional parking bays.</p>
3.9	<p>Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?</p>		<p>Larger families may require larger cars that may be older or heavier and therefore emit greater levels of CO2, paying more for their parking.</p> <p>The daily cost of a first annual permit ranges from £0.13 for the least polluting vehicle to £0.68p for the most polluting equate to a small percentage of the annual costs of running a motor vehicle. Parking permits are also available for shorter period of 1, 3 and 6 months to reduce the financial impact and provide greater flexibility.</p>
3.10	<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>As a result of the initial consultation regarding the RPZ, the following amendments were made to parking in the proximity to churches in the area;</p> <ul style="list-style-type: none"> • Amendment of dual use permit holder and 2 hour limited waiting to dual use permit holder and 3 hour limited waiting in the bays surrounding the Oldfield Park Baptist Church.

			<ul style="list-style-type: none">• Amendment of resident parking only to dual use resident's parking and 3 hour no return. This will allow patrons a greater length of time to have access to St Bartholomew's church.• Amendment of resident parking only to dual use resident's parking and 3 hour no return. This will allow patrons a greater length of time to have access to St Alpheges Church. <p>In addition, churches were provided with permits to cover events with a high number of visitors such as funerals.</p> <p>Larger families may require larger cars that may be older or heavier and therefore emit greater levels of CO2, paying more for their parking.</p> <p>The daily cost of a first annual permit ranges from £0.13 for the least polluting vehicle to £0.68p for the most polluting equate to a small percentage of the annual costs of running a motor vehicle. Parking permits are also available for shorter period of 1, 3 and 6 months to reduce the financial impact and provide greater flexibility.</p>
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<p>3.11</p>	<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</p> <p>(this is not a legal requirement, but is a local priority).</p>	<p>The addition of half day paper permits for vulnerable residents provides greater flexibility and value for those not able to use digital permits.</p> <p>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.</p> <p>However, it's noted that whilst there is no disproportionate impact to more deprived areas, its 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>Community transport schemes operate across Bath and North East Somerset to provide safe, accessible transport for people who cannot use public transport due to disability, age or lack of access to services. More information on these can be found online at</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.</p> <p>The daily cost of a first annual permit ranges from £0.13 for the least polluting vehicle to £0.68p for the most polluting equate to a small percentage of the annual costs of running a motor vehicle. Parking permits are also available for shorter period of 1, 3 and 6 months to reduce the financial impact and provide greater flexibility.</p> <p>There is a wide choice of alternative options for travel within Bath, for example public transport, this including Park & Ride Services. Other private car park provision is available in Bath.</p> <p>People who are of state Pension Age may apply for a free Older Persons Bus Pass. The Park</p>
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		<p>https://livewell.bathnes.gov.uk/community-transport</p> <p>People of qualifying age, or who have certain disabilities, can obtain a free Diamond Travelcard which will enable free bus travel on all local bus services, or discounted travel on community travel schemes.</p> <p>https://beta.bathnes.gov.uk/applying-free-bus-pass-diamond-travelcard</p>	<p>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</p>	<p>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 that is typically cheaper than the cost of parking in the city.</p>	<p>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.</p>

		<p>Community transport schemes operate across Bath and North East Somerset to provide safe, accessible transport for people who cannot use public transport due to disability, age or lack of access to services. More information on these can be found online at https://livewell.bathnes.gov.uk/community-transport</p> <p>People of qualifying age, or who have certain disabilities, can obtain a free Diamond Travelcard which will enable free bus travel on all local bus services, or discounted travel on community travel schemes. https://beta.bathnes.gov.uk/applying-free-bus-pass-diamond-travelcard</p>	
3.13	<p>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</p>		<p>No impact – anyone is eligible to access the additional parking bays.</p>

	decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).		
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*There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

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

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
EquiA to be reviewed annually or if significant changes happen within the service provision.	To review the EquiA		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: Tom Foster (Head of Capital Programme and Project Delivery)

Date: November 2024