

Equality Impact Assessment / Equality Analysis

(Updated December 2022)

Title of service or policy	Parking Charge review 2024/25 On-street parking charges and emission-based charging in Bath
Name of directorate and service	Place Management - Parking Services
Name and role of officers completing the EIA	Andrew Dunn, Team Manager – Parking
Date of assessment	1 May 2024 Latest review completed – 01 July 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.

1.1 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 on-street parking charges in Bath has been undertaken with the outcome to increase the charges and widen the adoption of the emission-based variable charge to continue to incentivise behaviour change and improve air quality following the successful introduction of emission-based pay and display charges in B&NES car parks and for residents parking permits introduced in Bath car parks in 2023.</p> <p>Includes a programmed uplift after a further 12 months to further incentivise and embed behaviour change due to the impacts of price elasticity and inflation.</p> <p>Delivery will be achieved in conjunction with colleagues in Highways to develop and implement required Traffic Regulation Orders (TROs).</p>
<p>1.2 Provide brief details of the scope of the policy or service being reviewed, for example:</p>	<p>There is no national requirement and as such there is room for review, noting that proposals will need to be taken to public consultation in line with the statutory process for TROs.</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>However, 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.</p> <p>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 and on street parking permits 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 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>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 of Bath has also seen changes to the</p>

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.

2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to
<p>2.1 What equalities training have staff received to enable them to understand the needs of our diverse community?</p>	<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>
<p>2.2 What is the equalities profile of service users?</p>	<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>
<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>	<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>
<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 proposals have been developed in cooperation with Parking Services, the Director of Place Management and Cabinet members, and proposed for 2024/25 as part of the Council's budget setting process, as approved by full Council in February 2024</p>

	<p>This EIA and the proposals are to be presented to the Climate Emergency and Sustainability Policy Development and Scrutiny panel on 21 March 2024, and have been reviewed following feedback received by the panel.</p> <p>This EIA and the proposals are due to be 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 28-day period in the Summer of 2024, and will be further reviewed following feedback received by the public and other stakeholders.</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 a minimum 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.</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>

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>Car parks (and Park & Ride sites) provide adequate lighting (noting fees for electricity have increased) which will be reviewed.</p> <p>It is also a requirement to have regard to conservation areas and restrictions that may be imposed to limit 'light spill'.</p> <p>The council is reviewing security of its two locations with covered parking in Bath city centre where ASB is experienced.</p> <p>CCTV is present at most council car parks. This provision is currently under review and will include identification of any potential for improvements.</p>
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.	<p>Women on maternity leave may have reduced income and need to access health services in the area.</p> <p>The council is reviewing security of its two locations with covered parking in Bath city centre where ASB is experienced.</p>

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<p>3.4 Gender reassignment – identify the impact/potential impact of the policy on transgender people</p>		<p>Car parks (and Park & Ride sites) provide adequate lighting (noting fees for electricity have increased) which will be reviewed. 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 most council car parks. This provision is currently under review and will include identification of any potential for improvements.</p> <p>The council is reviewing security of its two locations with covered parking in Bath city centre where ASB is experienced.</p>
<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>No negative impact – a blue badge is a mobility concession not a financial one, however its recognised that a blue badge holder may be more likely to be on a lower income.</p> <p>Any improvements in air quality that result from a reduction in vehicles entering central areas or residential will be of benefit to those that are vulnerable to poor air quality</p> <p>Blue badges can be used on street pay and display or time limited bays with no time limit, or on double and single yellow lines for up to 3 hours.</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>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 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 road closures and to ensure alternative</p>

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		<p>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>Any improvements in air quality that result from a reduction in vehicles entering central areas or residential will be of benefit to those that are vulnerable to poor air quality</p>
3.6 Age – identify the impact/potential impact of the policy on different age groups	<p>Any improvements in air quality that result from a reduction in vehicles entering central areas or 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>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>
3.7 Race – identify the impact/potential impact on across different ethnic groups		<p>It's important to note that the aims of the emission-based variable charges are to improve air quality within urban areas and protect the health, safety</p>

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		<p>and wellbeing of vulnerable people that are more directly affected by air pollution and poor air quality.</p> <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 national 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</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>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 town centres 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.</p> <p>Promotion of the variable charges, and the basis for the charge (including the impact on foreign registered vehicles), will be well publicised so that those planning trips to cities and towns where these charges exist may make an informed choice for their mode of transport and consider alternative options for travel, for example public transport.</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>It is also a requirement to have regard to conservation areas and restrictions that may be imposed to limit 'light spill'.</p>

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		CCTV is present at most council car parks. This provision is currently under review and will include identification of any potential for improvements. Other private car park provision is available in Midsomer Norton.
3.8 Sexual orientation – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people		No known impact
3.9 Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?		<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>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>The costs of parking stays equate only to a small percentage of the annual costs of running a motor vehicle.</p>
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>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>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>

	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>However, the costs of parking stays equate only to a small percentage of the annual costs of running a motor vehicle.</p>
<p>3.11 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 Council provides a Park and Ride service for Bath 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>	<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 CO2, and therefore pay more to park in Bath council owned car parks.</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>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 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.

	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
		<ul style="list-style-type: none"> • 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 that is typically cheaper than the cost of parking in the city.</p>	<p>Free parking remains available in Keynsham within 2 locations for 30 minutes and 1 hour. On street free to use limited waiting bays are available within these areas.</p> <p>Free car parking remains available in Radstock. On street free to use limited waiting bays are also available within both Midsomer Norton and Radstock.</p> <p>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 are available for those visiting Bath, including the Park and Ride are available 7 days a week</p> <p>https://travelwest.info/park-ride/</p>
<p>3.13 Armed Forces Community ** serving members; reservists; veterans and their families, including the bereaved. Public services are required</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
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).		

*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
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EIA to be reviewed annually or if significant changes happen within the service provision.	To review the EIA		Team Manager - Parking	1 st April
Issues raised by: 1. Members 2. The Climate Emergency and Sustainability Policy Development and Scrutiny panel 3. Council's Independent Equalities Advisory Group 4. Consultees through statutory consultation.	Staff to review feedback and identify any equalities issues and actions required as necessary.	Completion of review of feedback: 1. completed 2. completed 3. Not yet completed 4. Not yet completed 5.	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:  Gary Peacock, Head of Service, Highway Delivery
Date: 26th June 2024