

Equality Impact Assessment / Equality Analysis

Title of service or policy	Bus Gate, Milsom Street, Bath
Name of directorate and service	Highways and Traffic Group
Name and role of officers completing the EIA	Paul Garrod
Date of assessment	January 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 service delivery as well as employment policies and strategies.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis on a policy, service or function. It is intended that this is used as a working document throughout the process, with a final version (including the action plan section) being published on the Council’s and NHS Bath and North East Somerset’s websites.

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 Highways and Traffic Group (Traffic Management Team) have worked with the Parking Services and High Streets Renewal (Economy and Growth) Teams of Bath and North East Somerset Council to deliver a bus gate that operates between 10am-6pm daily on Milsom Street.</p> <p>This was first introduced on a temporary basis in June 2020 as part of the Council’s measures to assist public transport during the pandemic and to aid social distancing. With the end of social distancing a trial of this temporary restriction was introduced for the purpose of facilitating the passage of local service buses in accordance with Section 3(d) of the Road Traffic Regulation Act 1984. This has been implemented through use of an Experimental Traffic Regulation Order (ETRO).</p> <p>The trial began in December 2021 together with a six month period in which comments or objections could be submitted. This has allowed time to gather data and feedback before a decision is taken on whether to make the vehicle access restriction/bus gate permanent or not.</p> <p>Promoting public transport helps to tackle the climate and ecological emergency by encouraging increased use of public transport and a modal shift away from personal car use to other modes of transport such as public</p>

		<p>transport and active travel. Removing motor vehicles from Milsom Street between 10am and 6pm helps buses keep to their timetabled frequency and helps with the reliability of bus journey times because vehicles pulling into or out of parking spaces does not delay them.</p> <p>A secondary objective of the access restriction is to provide a largely traffic-free environment, making it a more pleasant and safer environment for pedestrians and cyclists.</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>This is a local highway improvement project.</p> <p>Various options have been considered, but the traffic and parking in Milsom Street has held up buses and as a key route on the bus network, this bus gate would better support public transport on this route.</p> <p>The government is encouraging local authorities to reallocate road space in favour of pedestrians, cyclists and buses through its Gear Change and Bus Back Better strategies.</p>
1.3	<p>Do the aims of this policy link to or conflict with any other policies of the Council?</p>	<p>The Council's Journey to Net Zero strategy seeks to encourage greater use of public transport, walking and cycling for some journeys, for those who are able.</p> <p>The aims of the project also correspond with other policies and priorities of the Council, such as the Clean Air Zone, Climate Emergency, and wider improvements to public transport and the highway infrastructure (walking and cycling routes).</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, gender, 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 is the equalities profile of the team delivering the service/policy?	As the project is being delivered in its entirety by teams from within the Council, the equalities profile of the team is varied and reflects the profile of the wider Council.
2.2	What equalities training have staff received?	All staff are encouraged to attend Equalities training (this is a prerequisite for managers and senior staff). A number of staff have attended an awareness event with the RNIB and some staff have also completed a Healthy Streets course.
2.3	What is the equalities profile of service users?	The equalities profile of the users of Milsom Street is typical of any public highway in a busy, urban, shopping environment.
2.4	What other data do you have in terms of service users or staff? (e.g results of customer satisfaction surveys, consultation findings). Are there any gaps?	<p>Feedback from the City Centre Security consultation included comments on this, unrelated, access restriction and have been considered in development of the project to date.</p> <p>The Experimental TRO process has allowed for feedback during the first 6 months of the experiment, enabling all users and stakeholders to respond on any issue, which would include equalities considerations.</p>
2.5	What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	In November 2021 an Experimental Traffic Regulation Order was introduced to formally give people the opportunity to comment on the access restriction. The council contacted all Blue Badge Holders for whom we have records to let them know about the experiment and the consultation, and how to comment. The consultation was also presented to the council's Independent Equalities Advisory Group (EAG) on 20/1/22

		<p>which was attended by a number of local voluntary and community sector organisations. No issues were raised at the EAG.</p> <p>Consultation responses from people in protected characteristic groups are summarised below.</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?	A decision will be made shortly as to whether the experimental bus gate access restriction should be made permanent, therefore no further consultation will be undertaken on this specifically. However, further consultation will be undertaken on the Council's proposals for the wider Milsom Quarter area. Comments from the consultation on this experimental access restriction are being shared with the Milsom Quarter project team including any that relate to equalities issues.

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 helps 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	Gender – identify the impact/potential impact of the policy on women and men.	The project raises no equality issues or specific considerations relating to gender.	There are no actual or potential negative or adverse impacts.
		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

3.2	Pregnancy and maternity	<p>Since some pregnant women may experience mobility difficulties, please see comments below under 3.4 'disability'.</p> <p>Reducing traffic in areas can improve air quality which can help reduce the impact of vehicle generated pollutants such as NO2 on the health of both maternity and unborn children</p>	<p>Since some pregnant women may experience mobility difficulties, please see comments below under 3.4 'disability'.</p>
3.3	Transgender – – identify the impact/potential impact of the policy on transgender people	The project raises no equality issues or specific considerations relating to transgender people.	There are no actual or potential negative or adverse impacts.
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)	<p>Accessibility for all road users has been considered throughout the design and implementation stages, in accordance with regulations and good practice etc.</p> <p>To help address the loss of access to parking in Milsom Street between 10am and 6pm, 5 new disabled bays were provided in New Bond Street and 2 in Quiet Street.</p> <p>Dial a Ride minibuses have also been given access through the bus gate.</p> <p>New accessible seating areas in 'parklets' have been provided in Milsom Street too, using space formerly allocated to pay & display parking. This can help provide a rest area for those with walking difficulties.</p> <p>Recognising that not all disability is mobility based, a general reduction in</p>	<p>The vehicle access restriction has impacts upon disabled people because it is no longer possible to drive into the road between 10am and 6pm. This means it is not possible to stop a vehicle outside of specific premises in order to drop off or pick up a passenger. It also means the 4 disabled bays and pay & display parking bays in Milsom Street are not available during these hours.</p> <p>This could mean that people who have severe mobility issues can no longer access premises in Milsom Street, or those who purchase large products from the shops are unable to carry them to the next nearest place where loading is permitted.</p> <p>The Council received 84 responses which made reference to disabled access, Blue Badge Holders or</p>

		<p>traffic does make the space both safer and more suitable for those with sensory difficulties such as vision impairment or hyper sensitivity based conditions.</p> <p>A new loading bay has been provided in George Street close to the junction with Milsom Street for those who need to make collections or deliveries when the access restriction is in force.</p> <p>Plans are being made to improve the access passage between Milsom Street and Broad Street car park and to investigate potential ways that the opening/closing times of the passage can be made consistent.</p> <p>Reducing traffic in areas can improve air quality which can help reduce the impact of vehicle generated pollutants such as NO2 on the health of those with health conditions such as COPD, Asthma, heart conditions and other long term NCD</p>	<p>mobility-related issues during the 6 month consultation period. Some stated that the additional disabled bays are too far away. Others had concerns that they could not be confident the passageway between Broad Street car park and Milsom Street would be open when they returned, which deterred them from using that car park.</p> <p>Several people who objected stated that because Milsom Street is on a hill it's even more important that people with mobility difficulties are given vehicular access.</p> <p>Generally, most people who responded to the consultation who had mobility difficulties stated that the vehicle access restriction would prevent them from using the businesses in Milsom Street.</p> <p>The Council has taken steps to help people with mobility difficulties by providing new disabled bays in adjoining roads as close as possible to Milsom Street. It was not possible to locate them any closer. It is still possible to drop off or pick up a Blue Badge holder passenger at the bottom of Milsom Street/Old Bond Street using John Street and Quiet Street.</p> <p>Historically, there are a number of roads in Bath and other towns and cities which have not been open to</p>
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			<p>motor vehicles for many years and there are many premises where it is not possible to park or stop directly outside.</p> <p>The disabled parking bays in Broad Street car park are 28 metres from Milsom Street via a pedestrian passageway, which is wide enough for powered wheelchair mobility vehicles. The passageway is not owned by the Council and the lockable gate is currently controlled by the landowner. The Council is investigating how there can be consistency with its opening times, which are generally 9am to 5pm and that these are clearly signed to give people more confidence to utilise the under-used disabled parking bays in Broad Street car park.</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
3.5	Age – identify the impact/potential impact of the policy on different age groups	Since some older people may experience mobility difficulties, please see comments above under 3.4 ‘disability’.	Since some older people may experience mobility difficulties, please see comments above under 3.4 ‘disability’.
3.6	Race – identify the impact/potential impact on different black and minority ethnic groups	The project raises no equality issues or specific considerations relating to race.	There are no actual or potential negative or adverse impacts.
3.6	Sexual orientation - identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people	The project raises no equality issues or specific considerations relating to sexual orientation.	There are no actual or potential negative or adverse impacts.
3.7	Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?	The project raises no equality issues or specific considerations relating to marriage and civil partnerships.	There are no actual or potential negative or adverse impacts.

3.8	Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	The project raises no equality issues or specific considerations relating to religion or belief.	There are no actual or potential negative or adverse impacts.
3.9	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).	The project raises no equality issues or specific considerations relating to socially-economically disadvantaged people.	There are no actual or potential negative or adverse impacts.
3.10	Rural communities* – identify the impact / potential impact on people living in rural communities	The project raises no equality issues or specific considerations relating to rural communities.	There are no actual or potential negative or adverse impacts.

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

Concerns about access to Milsom Street from some people with mobility difficulties and other disabilities.	Share a summary of this information with the Milsom Quarter project team so it can be taken into account as this wider project is developed further.	N/A	Paul Garrod, Wendy Maden	January 2023
Concerns over the hours that the pathway between Milsom Street and Broad Street car park is open.	Investigate potential Council management of the pathway or agreement with landowner to confirm the times it will be open, including signs that tell people the hours it is open.		Wendy Maden	Summer 2023

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

Date: 15/03/23