

City of York Council
Equalities Impact Assessment

Who is submitting the proposal?

Directorate:	Economy and Place		
Service Area:	Regeneration		
Name of the proposal :	Strategic Review of City Centre Access and Council Car Parking		
Lead officer:	Andy Kerr		
Date assessment completed:	04/11/2021, updated on 14 March 2022		
Names of those who contributed to the assessment :			
Name	Job title	Organisation	Area of expertise
Katie Peeke-Vout	Regeneration Project Manager	City of York Council	Regeneration
Andy Kerr	Head of Regeneration and Economy	City of York Council	Regeneration, economy, housing
Heidi Lehane	Senior Solicitor	City of York Council	Legal Services
Helene Vergereau	Traffic and Highway Development Manager	City of York Council	Transport

Step 1 – Aims and intended outcomes

1.1	What is the purpose of the proposal? Please explain your proposal in Plain English avoiding acronyms and jargon.
	<p><i>As set out in the My City Centre vision, people are crucial to the ongoing economic and social success of the city centre. The purpose of the Strategic Reviews of City Centre Access and Council Car Parking is to improve access to the city centre to continue to support the economic and social vibrancy of the city centre.</i></p> <p><i>The Strategic Reviews of City Centre Access and Council Car Parking have been undertaken in conjunction with the creation of the My City Centre Vision and the recommendations contained in both strategies' positively contribute to the aspirations set out in the long term vision for the city centre.</i></p> <p><i>The aim of the review of city centre access is to explore through public and stakeholder engagement how access can be improved to and through the city centre and the pedestrian footstreet area, with a particular focus on disabled people, cycling and e-scooters, deliveries, taxis and residents who live within the footstreets.</i></p> <p>The aim of the review of the council's car parking is to create a hierarchy that identifies priority car parks for investment and informs future decision making.</p> <p>Both elements of the Strategic Review undertaken have accompanying action plans, the recommendations of which this EIA assesses.</p> <p>The two reviews are intrinsically linked, particularly in the role car parks have in improving access to the city centre for disabled people. During the public engagement on city centre access some disabled people identified that proximity to the city's pedestrianised footstreets was less important to them, and they would rather park in car parks with high standard disabled parking bays, better facilities, and high quality access routes in to the city centre. The review of council car parking has drawn on the city centre access review engagement to inform the action plan.</p>

1.2	Are there any external considerations? (Legislation/government directive/codes of practice etc.)
	<p>Equality Act 2010, which aims to protect people from discrimination in the workplace and in wider society. The Act includes a Public Sector Equality Duty, which requires public bodies to consider how their decisions and policies affect people with protected characteristics. The public body also should have evidence to show how it has done this. It also requires that public bodies have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities. The Equality Act 2010 covers the following protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.</p> <p>The Blue Badge scheme: rights and responsibilities in England (www.gov.uk/government/publications/the-blue-badge-scheme-rights-and-responsibilities-in-england)</p> <p>Road Traffic Regulation Act 1984, setting out the legal basis for Traffic Regulation Orders</p> <p>Guidance on the Use of Tactile Paving Surfaces, December 2021, providing a guide to best practice on the use of tactile paving surfaces</p> <p>Inclusive Mobility A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure, December 2021, providing a guide to best practice on access to pedestrian and transport infrastructure</p>

1.3	<p>Who are the stakeholders and what are their interests?</p>
	<p><i>All current and potential future users of the city centre are stakeholders in this review of city centre access. This includes residents, visitors, businesses, and people travelling through the city centre.</i></p> <p><i>A number of people and representative groups who were identified as key stakeholders were targeted through direct engagement. These groups are those particularly impacted by the city centre’s pedestrianised footstreet area. It should be noted that the Strategic Reviews are separate to other decisions on the geography of the footstreet areas, instead it is focused on how access to and through the footstreets could be improved.</i></p> <p><i>Proposals have been put forward by various groups and individuals through previous engagement and the first phase carried out as part of this access review. These proposals have been considered from a technical perspective, but also through targeted engagement with those who will likely be impacted by these proposals. The majority of the proposals in the action plan provide new and additional measures to improve the situation for those affected groups</i></p> <p><i>This includes Cyclists and cycling groups who use the routes in to and around the city centre.</i></p> <p><i>Disabled people, and the groups that represent and advocate the views and rights of these individuals.</i></p> <p><i>City Centre business both from the perspective of those benefitting from the additional space created through the extended footstreets and those that have been impacted negatively such as delivery/courier businesses and employees, and businesses who rely on these services.</i></p> <p><i>City Centre residents are also stakeholders as any changes to access and measure proposed will affect their access to their homes as well as the environment in which they live.</i></p>

<p>1.4</p>	<p>What results/outcomes do we want to achieve and for whom? This section should explain what outcomes you want to achieve for service users, staff and/or the wider community. Demonstrate how the proposal links to the Council Plan (2019- 2023) and other corporate strategies and plans.</p>
	<p><u>Well Paid Jobs and an Inclusive Economy</u>: Both reviews are important parts of helping to deliver the My City Centre vision in seeking to provide a vibrant city centre with good footfall at all times to support jobs and the economy.</p> <p><u>Greener & Cleaner City</u>: Both strategies set out a number of sustainable transport improvements, including the ambition for all city centre deliveries to be by ultra-low emission vehicles or cargo bike by 2030; a feasibility study in to a trans-shipment hub; improvements to cycle routes and parking; EV charging policies; and a strategy to manage any future natural or policy led reduction in car parking demand.</p> <p><u>Good Health & Wellbeing</u>: The Strategic Review of City Centre Access recommends a number of improvements to access in the city centre, particularly for disabled people, and investment in active transport.</p> <p><u>Safe Communities & Culture for All</u>: The Strategic Review of City Centre Access considers how access to all groups can be improved to the city centre and proposes a number of recommendations and funded projects to deliver the vision.</p> <p><u>An Open and Effective Council</u>: The Strategic Review of City Centre Access has been developed through an open, transparent, wide-ranging and inclusive engagement approach following the ‘My’ principles set out in the report.</p>

Step 2 – Gathering the information and feedback

2.1	<p>What sources of data, evidence and consultation feedback do we have to help us understand the impact of the proposal on equality rights and human rights? Please consider a range of sources, including: consultation exercises, surveys, feedback from staff, stakeholders, participants, research reports, the views of equality groups, as well your own experience of working in this area etc.</p>
<p>Source of data/ supporting evidence</p>	<p>Reason for using</p>
<p><i>Extensive community and stakeholder engagement carried out directly related to this review.</i></p>	<p>Strategic Review of City Centre Access Engagement</p> <p>The review followed the council’s ‘My’ approach to public engagement that places the public and stakeholders at the heart of understanding and defining challenges, producing an open brief, establishing a draft vision, and then testing and refining that vision through further engagement.</p> <p>The initial engagement:</p> <ul style="list-style-type: none"> • Ran for 12 months, included 3 surveys distributed online and to every household in York – with freepost return – in the council’s Our City publication. • The council co-facilitated two online workshops and events with the York Disability Rights Forum in the summer of 2020 and were signed by British Sign Language interpreters and attended by 30 people. • Officers attended specific insight meetings with York Disability Rights Forum, My Sight York, the Older People’s Advocacy Group and others with a combined membership of several thousand. • In 2021 there were a further seven targeted events to discuss the disabled access routes through the city centre, Shopmobility services, cycling and couriers, deliveries and taxis.

	<p>All of these events went in to producing an Open Brief (a separate annex to the report) on the issues raised. The draft recommendations and strategy were then based on that Open Brief and the findings of two independent reviews that considered York’s accessibility challenges. The final engagement on the draft recommendations received over 1,000 survey responses and 300 interactions on social media and helped to refine the final strategic review document.</p>
<p><i>Drawing on the extensive community and stakeholder engagement that has been undertaken since 2020</i></p>	<p>My City Centre engagement – was an ongoing engagement with residents, businesses and special interest groups. This was an open discussion approach around what the city centre could look like in the future and was again based on a multi-platform approach to engagement with face to face workshops (pre-covid), online session, questionnaires, live Facebook panel Q&A, and social media interactions.</p> <p>City Centre Access Project (<i>relating to the Hostile Vehicle Mitigation</i>) - The extent of the footstreet area has been subject to ongoing discussions for a number of years as part of the City Centre Access project in part in response to the threat of terrorism, and particularly the use of hostile vehicles as a potential mode of attack. This led to the approval of a first phase of hostile vehicle mitigation measures for the existing permanent footstreet area, but with potential future phases to expand the area of protection.</p> <p>Temporary Covid measures – When the temporary Covid measures were introduced, the Council engaged with approx. 450 individuals as well as advocacy groups representing thousands of people with disabilities and/or reduced mobility across the city. An open community brief detailed the main themes and challenges which these changes sought to address, and the summary of conversations with the city’s businesses and representative groups. The principles of the footstreets extension was broadly supported by a majority of respondents to the citywide survey, which was also reflected in the support from residents identifying themselves as disabled. There are tangible benefits for many, in particular blind and partially sighted people, children, and older people. However, the desire from many for footstreets and spaces to be vehicle free is in contrast to Blue Badge holders’ request for vehicular access to the pedestrianised area. These objections were articulated in a petition signed by 1,093 people, including 501 York residents, calling for the reversal of the changes.</p>
<p><i>Independent Reports</i></p>	<p>Two independent reviews commissioned by the council and conducted in 2020 and 2021 by Disabled Motoring UK and Martin Higgitt Associates which explored a range of issues and helped guide the outcomes as set out in the strategy document.</p>

York Open Data, Council corporate datasets	Inform hierarchy of council car parking - namely parking data
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Step 3 – Gaps in data and knowledge

3.1	What are the main gaps in information and understanding of the impact of your proposal? Please indicate how any gaps will be dealt with.	
	Gaps in data or knowledge	Action to deal with this
	<i>Further feasibility work required for some of the proposed mitigation measures</i>	<i>Further feasibility work, consultation with affected groups and detailed design will be required for some of the proposals included in the Active Travel Fund bid, which aims to secure funding to improve disabled access routes into and around the city centre.</i>
	<i>Medium and long term impact on stakeholders</i>	<i>Review of new and emerging technology solutions which could potentially enable a review of restrictions or offer different access solutions in the future.</i> <i>Continuous monitoring and engagement with stakeholders to understand the medium and long term impacts of the changes and identify further changes and potential adjustments.</i>
	<i>There has been significant behaviour change relating to modes of transport and city centre usage as a result of Covid. Due to still being in the midst of the pandemic, it is uncertain what the “new normal” will look like for individual and corporate behaviour.</i>	<i>Recommendations in both the Strategic Reviews of City Centre Access and Council Car Parking Strategy commit to continue to build evidence bases to inform future decision making and to continue engagement with stakeholders to understand emerging needs once behaviours settle in to a “new normal”.</i>

	<p><i>proportion of older people that would have preferred an earlier finish, however, this was not unanimous.</i></p> <p><i>It is important to consider these views in the context of wider changes to the footstreets as exemptions enabling Blue Badge holders to park in some of the pedestrianised streets have recently been removed. This means that Blue Badge holders who were previously able to access the footstreets by car during the day now can only do so after 7pm (under the temporary Covid arrangements) or 5pm (under the current permanent arrangements). A permanent change to 7pm would therefore further restrict access for all users, including Blue Badge holders.</i></p> <p><i>It should be noted that any change to the permanent footstreet hours will need a separate statutory consultation and full Equalities Impact Assessment before the decision is made.</i></p>		
<p>Disability</p>	<p>Overall positive impact: <i>The range of measures proposed in the access review provide a wide range of improvements and investment in improving access for disabled people based on the issues that were identified through engagement. There is also an action to appoint an Access Officer which was a direct request of disabled advocacy groups and will take forward a number of measures to ensure that access continues to be improved.</i></p> <p><i>The review of council car parking commits to working with disabled people to identify two car parks for targeted investment</i></p>	<p>Positive</p>	<p>Medium</p>

	<p><i>with high standard disabled parking bays, better facilities, and high quality access routes in to the city centre.</i></p> <p>Negative Impact: <i>There are some blue badge holders who have made clear that there are no improvement to access that is sufficient to replace their ability to be able to park in the footstreet areas. Whilst this review does not contain any decisions in relation to the geography of the footstreets, the proposal to consider the footstreet hours to be permanently extended to 7pm would mean they could not park in these areas until later than pre-pandemic. However, as noted above the impact on these blue badge holders would be considered in full as part of a separate statutory consultation and Equalities Impact Assessment which included consideration of the Human Rights Act 1998 that would accompany any changes to permanent footstreet hours.</i></p>	Negative	Low
Gender	<p>No differential impact identified.</p> <p><i>Although no differential impact has been identified, the engagement showed that females are significantly more likely to support the improvement of facilities (i.e. toilets) in the city centre, suggesting that the proposed improvement to facilities available will have a particularly positive impact for females.</i></p>	Positive	Low
Gender Reassignment	<p>No differential impact identified.</p>		

Marriage and civil partnership	No differential impact identified.		
Pregnancy and maternity	<p><i>The proposals have been identified as having a positive impact on pregnancy and maternity when considering the potential impact on women who may experience pregnancy related mobility impairments, especially in later stages of pregnancy.</i></p> <p><i>The improvements to access services, access routes, improved facilities and increased provision of benches across the city centre may have a positive impact on women who may experience pregnancy related mobility issues. The improvements may also positively impact on parents and carers of younger children in pushchairs through improved routes and facilities.</i></p> <p>Positive impacts – <i>As evidenced by the consultation responses, some people living with a disability benefit from the reduction in the number of vehicles and cycles accessing the footstreet area, making it a safer environment for all users. Adopting the City Centre Access model outlined in the strategy which reaffirms the restriction of cycling and e-scooters from being in the footstreets whilst improving cycle parking and routes on the edge of the area would provide a safer environment for mothers, fathers and carers of young children young children.</i></p>	Positive	Low
Race	No differential impact anticipated		

Religion and belief	<p><i>The proposals have been identified as having a positive impact on access to places of worship in the footstreet area for people who live with reduced mobility or a disability.</i></p> <p><i>The recommendations identified in the strategy provide a range of different access improvements to the city centre. These access improvements to the city centre are also improvements that support access to places of worship in the city centre St Sampson’s Centre (Church Street), The Holy Trinity Church (Goodramgate), St Helen’s Church (Stonegate), and St Martin le Grand (Coney Street).</i></p>	Positive	Low
Sexual orientation	<p><i>No differential impact anticipated</i></p>		
Other Socio-economic groups including :	<p>Could other socio-economic groups be affected e.g. carers, ex-offenders, low incomes?</p>		
Carer	<p><i>The proposals have been identified as having a positive impact carers. This includes carers of disabled people, people with mobility issues, children and adults.</i></p> <p><i>The positive impacts for carers mirror those identified above under Disability, Age, and Pregnancy and Maternity.</i></p> <p>Negative: <i>As noted earlier a change to 7pm from the 5pm pre-coivid permanent footstreet hours would impact on all car users, including Blue Badge holders who used to park in the footstreets, and by extension may impact on their carers at those times.</i></p>	Positive	Medium
		Negative	Low

Low income groups	<p>Mixed: Improved access to the city through route improvements and improved access to facilities could have a positive impact on low income groups with limited mobility. Improving access to leisure and employment opportunities in the city centre.</p> <p>Some of the services identified that support access to the city centre through the provision of mobility aids and transport incur a cost to the user. This could preclude low income groups from accessing these services. The cost of using these services is kept to a minimum.</p>	Neutral	Low
Veterans, Armed Forces Community	No differential impact anticipated		
Other			
Impact on human rights:			
List any human rights impacted.	<p>Article 8 of the Human Rights Act 1998 - right to respect for private and family life</p> <p>This Convention Right is broad and covers a person's right to develop your personal identity and to forge friendships and other relationships. This includes a right to participate in essential economic, social, cultural and leisure activities.</p> <p>The Strategic Reviews reflect significant commitments that improve access to the city centre for disabled people, whilst</p>		

	<i>noting that some blue badge holders may be negatively impacted by any future formal change to later footstreet hours.</i>		
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Use the following guidance to inform your responses:

Indicate:

- Where you think that the proposal could have a POSITIVE impact on any of the equality groups like promoting equality and equal opportunities or improving relations within equality groups
- Where you think that the proposal could have a NEGATIVE impact on any of the equality groups, i.e. it could disadvantage them
- Where you think that this proposal has a NEUTRAL effect on any of the equality groups listed below i.e. it has no effect currently on equality groups.

It is important to remember that a proposal may be highly relevant to one aspect of equality and not relevant to another.

<p>High impact (The proposal or process is very equality relevant)</p>	<p>There is significant potential for or evidence of adverse impact The proposal is institution wide or public facing The proposal has consequences for or affects significant numbers of people The proposal has the potential to make a significant contribution to promoting equality and the exercise of human rights.</p>
<p>Medium impact (The proposal or process is somewhat equality relevant)</p>	<p>There is some evidence to suggest potential for or evidence of adverse impact The proposal is institution wide or across services, but mainly internal The proposal has consequences for or affects some people The proposal has the potential to make a contribution to promoting equality and the exercise of human rights</p>
<p>Low impact (The proposal or process might be equality relevant)</p>	<p>There is little evidence to suggest that the proposal could result in adverse impact The proposal operates in a limited way The proposal has consequences for or affects few people The proposal may have the potential to contribute to promoting equality and the exercise of human rights</p>

Step 5 - Mitigating adverse impacts and maximising positive impacts

5.1	Based on your findings, explain ways you plan to mitigate any unlawful prohibited conduct or unwanted adverse impact. Where positive impacts have been identified, what is been done to optimise opportunities to advance equality or foster good relations?
<p><i>The positive impacts identified in this Equalities Impact Assessment are the product of significant engagement to design solutions that improve access to the city centre and identified investment streams to deliver them. As in any exercise there may be further ideas and requests from those engaged but not all can be delivered due to technical or budget constraints.</i></p> <p><i>In terms of negative impacts, the only identified impact is on some blue badge holders should a formal decision be taken to enact the proposed permanent change to the footstreet hours. However, this will require further consideration of the impact, a statutory consultation and separate Equalities Impact Assessment to consider this in detail.</i></p> <p><i>Some of the proposals may have a legal requirement for consultation, as well as the need for other consents, approvals or legal processes. The requirements for each specific proposal will need to be carefully considered with the Council's legal team to ensure decisions relating to them are properly made.</i></p>	

Step 6 – Recommendations and conclusions of the assessment

6.1	<p>Having considered the potential or actual impacts you should be in a position to make an informed judgement on what should be done. In all cases, document your reasoning that justifies your decision. There are four main options you can take:</p>
<ul style="list-style-type: none"> - No major change to the proposal – the EIA demonstrates the proposal is robust. There is no potential for unlawful discrimination or adverse impact and you have taken all opportunities to advance equality and foster good relations, subject to continuing monitor and review. - Adjust the proposal – the EIA identifies potential problems or missed opportunities. This involves taking steps to remove any barriers, to better advance quality or to foster good relations. - Continue with the proposal (despite the potential for adverse impact) – you should clearly set out the justifications for doing this and how you believe the decision is compatible with our obligations under the duty - Stop and remove the proposal – if there are adverse effects that are not justified and cannot be mitigated, you should consider stopping the proposal altogether. If a proposal leads to unlawful discrimination it should be removed or changed. <p>Important: If there are any adverse impacts you cannot mitigate, please provide a compelling reason in the justification column.</p>	
Option selected	Conclusions/justification

<p><i>No major change to the proposal</i></p>	<p><i>The proposals are considered to have a significant positive impact on access to the city centre, with clear actions identified to continue to improve access to the city centre for all.</i></p> <p><i>Where known or potential negative impact is identified, this is balanced by the range of measures being proposed so ensure that there are improvements for all. Further work is identified to continue to explore additional services or access improvements through ongoing engagement with the identified stakeholder groups.</i></p>
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Step 7 – Summary of agreed actions resulting from the assessment

7.1	What action, by whom, will be undertaken as a result of the impact assessment.		
Impact/issue	Action to be taken	Person responsible	Timescale
<p><i>This report identifies that 7pm is the preferred time for the footstreets to re-open.</i></p>	<p><i>Any approval to proceed with changing the footstreet hours will require a statutory consultation and its own EIA.</i></p>	<p><i>Head of Transport</i></p>	<p><i>Decision yet to be taken</i></p>

Step 8 - Monitor, review and improve

8. 1	How will the impact of your proposal be monitored and improved upon going forward? Consider how will you identify the impact of activities on protected characteristics and other marginalised groups going forward? How will any learning and enhancements be capitalised on and embedded?
	<i>The impacts of the proposals will continue to be monitored through the following activities:</i> <ul style="list-style-type: none">• <i>Ongoing liaison with key disabled groups through the Access Officer (once appointed – subject to approval)</i>• <i>The creation of a York Standard will increase awareness across all stakeholders the barriers to accessing the city centre and establish a city wide commitment to continued improvement</i>• <i>Ongoing engagement with the business community in the city centre through representative groups such as the BID</i>