

**City of York Council**  
**Equalities Impact Assessment**

**Who is submitting the proposal?**

<b>Directorate:</b>		Place	
<b>Service Area:</b>		Transport	
<b>Name of the proposal :</b>		York City Centre Anti-Terrorism Traffic Regulation Order (ATTRO) – Decision to proceed with statutory consultation	
<b>Lead officer:</b>		Garry Taylor	
<b>Date assessment completed:</b>		4 June 2025	
<b>Names of those who contributed to the assessment :</b>			
<b>Name</b>	<b>Job title</b>	<b>Organisation</b>	<b>Area of expertise</b>
Helene Vergereau	Head of Highway Access and Development	City of York Council	Transport
Darren Hobson	Traffic Management Team Leader	City of York Council	Transport

## **Step 1 – Aims and intended outcomes**

1.1	<p><b>What is the purpose of the proposal?</b></p> <p>Please explain your proposal in Plain English avoiding acronyms and jargon.</p>
	<p>The proposal considered aims to start the statutory consultation process on the implementation of a permanent Anti-Terrorism Traffic Regulation Order (ATTRO) for the city centre of York. The area proposed would include the footstreets area which is currently protected by Hostile Vehicle Measures (HVMs), also including Deangate, Duncombe Place, High Petergate and Precentor's Court (see Annex D).</p> <p>An ATTRO is a legal order that gives the police the power to restrict or close off pedestrian and vehicle access to an area. This can involve things like, restrictions on when existing access barriers can be open to allow access, road closures, footway closures, the clearing of parked vehicles from streets in and around an area.</p> <p>An ATTRO can only be made after the Chief Officer of Police recommends it, and after statutory consultation. An ATTRO for the city centre was formally requested by the Chief Constable of North Yorkshire Police in a letter to City of York Council dated 9 December 2024 (see Annex C).</p> <p>The proposal, which is subject to consultation, would be for a permanent order that, if adopted, will lay dormant for most of the time. The police would however be able to use it when necessary. An ATTRO can be used in two ways:</p> <ul style="list-style-type: none"> <li>• It can be used in a proactive way as part of the planning process for events, as a precautionary safety measure (events can include New Year's Eve celebrations, Christmas markets, high profile, public ceremonial or sporting events, an international summit or a visit by a VIP); and</li> <li>• It can be used in conjunction with intelligence around a specific terrorism threat or for an ongoing incident where there is an immediate need to protect the public.</li> </ul>

	<p>When an ATTRO is used, the scope of restrictions must be proportionate and only last as long as necessary. A local authority can charge the beneficiary of an ATTRO for the costs associated with the order, but not for public events or assemblies.</p> <p>At this stage, the Executive Member is asked to decide whether to initiate the statutory consultation process to respond to the request from the Chief Constable of North Yorkshire Police and gather feedback before making a decision on whether the proposed ATTRO should be implemented.</p>
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<b>1.2</b>	<b>Are there any external considerations?</b> (Legislation/government directive/codes of practice etc.)
	<ul style="list-style-type: none"> <li>• An ATTRO for the city centre was formally requested by the Chief Constable of North Yorkshire Police in a letter to City of York Council dated 9 December 2024 (see Annex C).</li> <li>• Road Traffic Regulation Act 1984 Section 1 and Section 22</li> <li>• Equality Act 2010 and Human Rights Act 1998</li> </ul>

<b>1.3</b>	<b>Who are the stakeholders and what are their interests?</b>
	<p>Anyone who, if the ATTRO is implemented, may find that their access to the city centre is restricted when the ATTRO is in use. Event organisers and promoters whose event may lead to the ATTRO being activated and may have to cover the associated costs. Specific groups to consider include:</p> <ul style="list-style-type: none"> <li>• City centre residents</li> <li>• City centre businesses/premises and their staff, customers, suppliers, and trades, including businesses generally considered as essential (for example pharmacies, GP surgeries, Post Offices/Royal Mail, etc)</li> <li>• City centre traders and buskers, including traders at the Shambles market and temporary markets and events</li> <li>• People accessing the City Centre, including people with protected characteristics, Blue Badge holders, taxis and private hire vehicles, deliveries and couriers, etc</li> <li>• Utility companies and their contractors if they need to access their apparatus for installation and repairs</li> <li>• Events organisers, including Make it York</li> </ul>

<b>1.4</b>	<b>What results/outcomes do we want to achieve and for whom?</b> 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>ATTROs are used by the police to help keep people safe from the threat of terrorism by enabling the police, working with local authorities, to put protective security measures in place to reduce vulnerability to, or mitigate the potential impact of, attacks on or near roads. This relates to the Council Plan’s “Health and wellbeing” and “Economic Growth” priorities and goals.</p> <p>Starting the consultation process on the proposed ATTRO would also ensure that the Council responds to the request from the Chief Constable and progresses the actions agreed by the Council’s Executive on 12 October 2023 <i>“to start the process and consultation of developing an Anti-Terrorism Traffic Regulation Order</i></p>

	<p><i>and some events may mean access is restricted for the event”</i> (see Item 38, decision point vii here: <a href="https://democracy.york.gov.uk/ieListDocuments.aspx?CId=733&amp;MId=13931&amp;Ver=4">https://democracy.york.gov.uk/ieListDocuments.aspx?CId=733&amp;MId=13931&amp;Ver=4</a>).</p> <p>With the feedback and information gained through the consultation process, a decision would then be made on whether the proposed ATTRO should be implemented. This decision would seek to balance the significant impact if restrictions on access which would result from an ATTRO when in use (including the impacts on people with protected characteristics and the impact on human rights) and the public’s safety during events, when there is intelligence around a specific terrorism threat, or for an ongoing incident where there is an immediate need to protect the public.</p> <p>It is important to note that the Police has the powers to restrict access without a permanent ATTRO. The permanent ATTRO aims to supplement these powers by establishing a set process to activate the ATTRO for areas in the city centre and to establish decision making processes and delegation when the ATTRO is activated.</p>
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## Step 2 – Gathering the information and feedback

2.1	<p><b>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?</b> 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>		
<b>Source of data/supporting evidence</b>		<b>Reason for using</b>	
<p>Feedback received from previous consultations (see summary of information gathered under Item 38 here: <a href="https://democracy.york.gov.uk/ieListDocuments.aspx?CId=733&amp;MId=13931&amp;Ver=4">https://democracy.york.gov.uk/ieListDocuments.aspx?CId=733&amp;MId=13931&amp;Ver=4</a>)</p>		<p>To understand the impact access restrictions have on different groups accessing the city centre.</p> <p>The consultation on principles of reinstating blue badge access includes the following:</p>	

	<ul style="list-style-type: none"> <li>• Principle 2 - City centre events – Some events, as prior to the November 2021 decision, may require Blue Badge access to be suspended at times (for example during the Christmas Markets). 61% Agree, 32% Disagree, 7% Don't know, Total responses = 2870</li> <li>• Principle 3 - Recognising Security Risks – In light of any security risk intelligence, the Police will have the power to lock down all access to the City Centre under an Anti-Terrorism Traffic Regulation Order, a counter-terrorism measure under the Civil Contingencies Act 2004. 88% Agree, 7% Disagree, 5% Don't know Total responses = 2866</li> </ul>
Survey data	<p>To understand the number of people potentially affected by city centre access restrictions which could be put in place if an ATTRO was in use. This data includes:</p> <ul style="list-style-type: none"> <li>• Blue Badge City Centre Access Points Usage (<a href="https://data.yorkopendata.org/dataset/blue-badge-city-centre-access-points-usage">https://data.yorkopendata.org/dataset/blue-badge-city-centre-access-points-usage</a>)</li> <li>• Footfall in the centre of York (<a href="https://data.yorkopendata.org/dataset/footfall">https://data.yorkopendata.org/dataset/footfall</a>)</li> </ul>
Additional information will be collated through the statutory consultation process	

### Step 3 – Gaps in data and knowledge

3.1	<b>What are the main gaps in information and understanding of the impact of your proposal? Please indicate how any gaps will be dealt with.</b>	
<b>Gaps in data or knowledge</b>		<b>Action to deal with this</b>
Understanding of how often the ATTRO could be used, with which supportive measures, which access restrictions and for how long		This will be monitored regularly if the ATTRO is implemented

### Step 4 – Analysing the impacts or effects.

4.1	<b>Please consider what the evidence tells you about the likely impact (positive or negative) on people sharing a protected characteristic, i.e. how significant could the impacts be if we did not make any adjustments?</b> Remember the duty is also positive – so please identify where the proposal offers opportunities to promote equality and/or foster good relations.
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<b>Equality Groups and Human Rights.</b>	<b>Key Findings/Impacts</b>	<b>Positive (+) Negative (-) Neutral (0)</b>	<b>High (H) Medium (M) Low (L)</b>
<b>Age</b>	If a permanent ATTRO is implemented, the impact on people and groups with protected characteristics will depend on the extent of the restrictions that the police decides to put in place when the ATTRO is activated. This will in turn depend on the severity of the risk or incident for which the ATTRO has been activated.	-	M



Equality Groups and Human Rights.	Key Findings/Impacts	Positive (+) Negative (-) Neutral (0)	High (H) Medium (M) Low (L)
	<p>For example, in an instance where the police decides to restrict all motorised traffic into the city centre, this would have a negative impact on elderly people and people with young children as these groups may find it more difficult to access their destination on foot or by bicycle.</p> <p>If an incident took place which required the police to stop all access to a part of the city centre (for example cordoning off a street), this would have a negative impact on elderly people and people with young children as these groups may find it more difficult to walk or cycle for a longer distance using a diversion route to reach their destination.</p>		
<b>Disability</b>	<p>As noted above, the impact on people and groups with protected characteristics will depend on the extent of the restrictions that the police decides to put in place when the ATTRO is activated.</p> <p>For example, in an instance where the police decides to restrict all motorised traffic into the city centre, this would have a negative impact on Blue Badge holders, who are currently allowed vehicular access into the city centre (on specific streets) during footstreet hours. People who live with a disability would also be negatively affected (including those</p>	-	<b>M</b>

<b>Equality Groups and Human Rights.</b>	<b>Key Findings/Impacts</b>	<b>Positive (+) Negative (-) Neutral (0)</b>	<b>High (H) Medium (M) Low (L)</b>
	who do not hold a Blue Badge) as they are likely to have more difficulty accessing their destination on foot or by bicycle, especially when access restrictions means that they have to use a longer or less accessible diversion route.		
<b>Gender</b>	As noted above, the impact on people and groups with protected characteristics will depend on the extent of the restrictions that the police decides to put in place when the ATTRO is activated.  Access restrictions may have a negative impact on people who do not feel safe travelling on foot or by bike or choose specific routes due to them being well lit or overlooked. This is especially applicable in the hours of darkness. Vehicular access restrictions or the requirement to use a longer route which may have lower lighting levels or be more isolated/less overlooked, would have negative impact on these groups.	-	<b>M</b>
<b>Gender Reassignment</b>		-	<b>M</b>
<b>Race</b>		-	<b>M</b>
<b>Religion and belief</b>		-	<b>M</b>
<b>Sexual orientation</b>		-	<b>M</b>
<b>Marriage and civil partnership</b>	No differential impact identified		
<b>Pregnancy and maternity</b>	The impacts identified under the “age” and “disability” categories may apply here.	-	<b>M</b>

<b>Equality Groups and Human Rights.</b>	<b>Key Findings/Impacts</b>	<b>Positive (+) Negative (-) Neutral (0)</b>	<b>High (H) Medium (M) Low (L)</b>
<b>Other Socio-economic groups including :</b>	<b>Could other socio-economic groups be affected e.g. carers, ex-offenders, low incomes?</b>		
<b>Carer</b>	The impacts identified under the “age” and “disability” categories may apply here.	-	<b>M</b>
<b>Low income groups</b>	No differential impact identified		
<b>Veterans, Armed Forces Community</b>	No differential impact identified		
<b>Other</b>	n/a		
<b>Impact on human rights:</b>			
List any human rights impacted.	<p>The Convention rights applicable are:</p> <ul style="list-style-type: none"> <li>Article 2 - protects the right to life. In this case, its applicability relates to the requirement placed on the Government to take appropriate measures to safeguard life by making laws to protect people. Public authorities should also consider the right to life when making decisions that might put people in danger or that affect their life expectancy. This risk would be mitigated by activating the ATTRO</li> </ul>	<b>Some positive and some negative impacts on Human Rights</b>	<b>Medium</b>

Equality Groups and Human Rights.	Key Findings/Impacts	Positive (+) Negative (-) Neutral (0)	High (H) Medium (M) Low (L)
	<ul style="list-style-type: none"> <li>Article 8 - protects the right of the individual to respect for their private and family life, their home and their correspondence. The private life part of this right covers things like wellbeing, autonomy, forming relationships with others and taking part in our community.</li> <li>Article 14 - protects the right to be free from discrimination when enjoying other rights, such as Article 8.</li> </ul> <p>It is unlawful for a public authority to act in a way that is incompatible with a European Convention right (unless the authority could not have acted differently as a result of a statutory provision). An interference with a qualified right (e.g. the right to respect for private and family life) is not unlawful if the authority acts in accordance with the law to achieve a legitimate aim and the interference is necessary in a democratic society in the wider public interest.</p> <p>In addition, the law applies a proportionality test, including whether a fair balance has been struck between the rights of the individual and the interests of the wider community.</p> <p>The activation of the ATTRO and the access restrictions implemented would have a negative impact on people's ability to live independently, attend appointments, see people who are important to them, and be part of their community.</p>		

Equality Groups and Human Rights.	Key Findings/Impacts	Positive (+) Negative (-) Neutral (0)	High (H) Medium (M) Low (L)
	<p>In order to protect the right to life of the people working in and visiting York's pedestrianised area an ATTRO is proposed. As laid out in the report this would exist but only be used by the Police where a specific risk is identified and requires the Chief Constable to implement access restrictions.</p> <p>In making a decision the council must consider carefully the balance to be struck between individual rights and the wider public interest and whilst it is acknowledged that there could be interference with a Convention right, the decision must be reasonably justified as it is a proportionate means of achieving a legitimate aim.</p>		

### 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.

<b>High impact</b> (The proposal or process is very equality relevant)	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.
<b>Medium impact</b> (The proposal or process is somewhat equality relevant)	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
<b>Low impact</b> (The proposal or process might be equality relevant)	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

## Step 5 - Mitigating adverse impacts and maximising positive impacts

5.1	<b>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?</b>
The report proposes to review the ATTRO on an annual basis. The review will consider the use of the ATTRO, in terms of duration and impact, to consider the positive/adverse impact of the implementation of the ATTRO.	

## Step 6 – Recommendations and conclusions of the assessment

6.1	<b>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:</b>
<b>- No major change to the proposal</b> – 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.

**Important:** If there are any adverse impacts you cannot mitigate, please provide a compelling reason in the justification column.

Option selected	Conclusions/justification
Continue with the proposal	The recommended option within the report requests approval to carry out the statutory consultation and advertisement of the proposal to make an ATTRO for the city centre. It is therefore recommended to continue with the proposal, as it is currently proposed to undertake consultation on the proposal, which will help to provide more clarity on the impact of the proposal, prior to an decision on the making of the ATTRO.



## Step 7 – Summary of agreed actions resulting from the assessment

<b>7.1</b>	<b>What action, by whom, will be undertaken as a result of the impact assessment.</b>		
<b>Impact/issue</b>	<b>Action to be taken</b>	<b>Person responsible</b>	<b>Timescale</b>
Impact on Blue Badge Holders	Review of the representations received	Michael Howard	During the Statutory Consultation.
Impact on businesses and residents within the area of the ATTRO	Review of the representations received.	Michael Howard	During the Statutory Consultation.

## Step 8 - Monitor, review and improve

8. 1	<b>How will the impact of your proposal be monitored and improved upon going forward?</b> 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?
	<p>If the proposal is approved and the Statutory Consultation is progressed, there will be an opportunity for any resident with an impact from the proposal to provide representation, to help identify the impact of the proposal to help inform the decision on whether to make the ATTRO.</p> <p>If the ATTRO is made, it is proposed to review the impact of the ATTRO on an annual basis which will provide a regular opportunity to consider the impact of the proposal.</p>