

City of York Council
Equalities Impact Assessment

Who is submitting the proposal?

Directorate	Place		
Service Area	City Development		
Name of proposal:	Acomb Front Street Phase 2 – open public engagement on costed designs and ideas for the scheme.		
Lead Officer	David Warburton – Head of Regeneration		
Date Assessment Started	Update to previous EIA (5/04/22)		
Date Assessment Completed			
Names of those who contributed to the assessment :			
Name	Job Title	Organisation	Area of Expertise
Julie Stormont-Dawber	Delivery Officer	CYC	Regeneration
Katherine Atkinson	Regen Project Officer	CYC	Engagement/ Consultation
Dave Smith	Access Officer	CYC	Equalities
Greg Morgan	Sustainable Transport Officer	CYC	Active Travel
Carl Wain	Social Action Manager	CYC	Communities
Helene Vergereau	Head of Highways Access & Development	CYC	Highway Development & Transport

Step 1 – Aims and intended outcomes

<p>1.1</p>	<p>What is the purpose of the proposal?</p>
	<p>Please explain your proposal in Plain English avoiding acronyms and jargon.</p>
	<p>Acomb Front Street is a key secondary shopping centre in York. To improve and enhance Acomb’s economic growth a Future of Acomb Front Street Study was commissioned in 2020, the study identified ten long term ideas and was noted by Executive in April 2022.</p> <p>During early 2023 highway improvement works saw the installation of new high-quality re-paving, enhanced drainage, and bollards that provide protection from vehicle over-run and prevent illegal parking. This work also improved accessibility through the provision of three tactile crossings points, trial of new accessible seating and high contrast accessible cycling racks. All works focused on the adopted highway, a significant section of the precinct is privately owned, non-adopted highway therefore landowners permission is required to action any works in that area. There has been significant challenge from the local community in relation to installation of the new bollards on Front Street culminating in the presentation of a petition to Full Council in July 2023.</p> <p>The phase 2 work acknowledges the strength of community feeling and aspirations for the area, consequently the need for open public engagement with the community for all subsequent work. The outcome of which will be a better understanding of local community priorities, sharing costed options to date, and potentially gaining support for scope of phase 2 work.</p> <p>The proposed scheme has been developed in collaboration with external urban designers and split down into 4 areas:</p> <ol style="list-style-type: none"> 1. enhancing the precinct- placemaking 2. extending the benefits beyond precinct 3. create more accessible destination 4. consider longer term aspirations.

Following the open public engagement, officers will analyse responses and comments to work up detailed designs, in order that a fully costed project scheme can be presented to Executive for consideration and approval to proceed in Summer 2024.

1.	Are there any external considerations?
2	<p>Please explain your proposal in Plain English avoiding acronyms and jargon.</p> <p>For both the open public engagement and potential scope of phase 2 works we will check against all relevant legislation including but not limited to:</p> <ul style="list-style-type: none"> Equality Act 2010, which aims to protect people from discrimination in the workplace and in wider society. 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>The open public engagement will be carried out in a local, accessible buildings and advertised widely to ensure all ward residents and businesses are made aware of the engagement and have suitable format alternatives by which they can respond as outlined in CYC Access Statement (see in Annex C). Responses include a survey available online and hardcopy, which will be available throughout. The two-week static display of proposed scheme at Acomb Explore (popular community library facility) and in person presentation at Joint Acomb, Westfield, Holgate Ward Committee will also facilitate reaching the wider community.</p> <ul style="list-style-type: none"> Human Rights Act –sets out the fundamental rights and freedoms that everyone is entitled to. In making a decision the council must consider carefully the balance to be struck between individual rights and the wider public interest, this ensures any decision is reasonably justified and achieves a legitimate aim. <p>To ensure transparency of decision making and final scope of work, the proposed scheme will be shared with the community for comment through 4 open engagement sessions and the static display, following questionnaire responses and comments officers will analyse results to prepare a fully costed report for executive approval and public scrutiny.</p>

	<p>Within the development of the proposed phase 2 scope we have considered the following codes of practice:-</p> <ul style="list-style-type: none"> • The Blue Badge scheme: rights and responsibilities in England (www.gov.uk/government/publications/the-blue-badgescheme-rights-and-responsibilities-in-england) • Approved Document M: ‘Access to and use of buildings’, volume 2: Buildings other than dwellings. 2015 edition, incorporating 2020 amendments. • BS 8300: 2018 ‘Design of an Accessible and Inclusive Built Environment’, Part 1: External environment • Department for Transport, ‘Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure’, 2022 • Highways Act 1980 • National Planning Policy Framework – shared spaces https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/749116/ministerial-letter-about-shared_space.pdf
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1.3	Who are the stakeholders and what are their interests?
	Consider both internal and external stakeholders.
	<p>Stakeholders :</p> <ul style="list-style-type: none"> • Acomb residents, visitors and businesses/traders • Acomb Explore • Acomb Neighbourhood Plan group • Community groups including What a Load of Bollards Group. • Ward Cllrs and council officers. • York Access Forum (YAF), York Disability Rights Forum (YDRF), York Older Persons Assembly (YOPA), Age Friendly York (AYF). New market operator (Little Bird Markets).

<p>1.4</p>	<p>What results/outcomes do we want to achieve and for whom?</p>
	<p>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>The open public engagement should enable all residents, visitors, and businesses to understand the potential scope of phase 2 work and allocated budget, costed options and comment as necessary.</p> <p>The phase 1 highway improvements works had limited engagement opportunity, a single afternoon drop-in session for residents, leaflet drop for tenants and businesses, plus online zoom session for traders. Reasonable attendance was achieved at the in-person drop-in, the online session was not so well attended. After seeking feedback from traders on the most convenient way to engage with them, we have built this into our engagement programme, the open public engagement will include a variety of in person sessions both mid-week and at the weekend, plus at different times of the day to ensure everyone has the opportunity to come find out more about the project and share their views. Additionally, there will also be a survey (available in multiple formats) to gather comments and priorities.</p> <p>Engagement materials will use images and photos where possible to minimise text/ word count on boards. Clear options will be presented. “Plain English” will be used and avoiding the use any jargon/ technical reference. We will share the engagement boards with the Access Officer for comment, prior to finalisation.</p> <p>The engagement will run for 4 weeks (26th February - 24th March 2024), full strategy see 2.1</p> <p>As a result of the public open engagement, we want to achieve the following outcomes:</p> <ul style="list-style-type: none"> • Community to have a good understanding of project, objectives and why we can/ can’t do things, outline any mitigation required.

	<ul style="list-style-type: none"> • Officers can gather community feedback and priorities for individual elements of scheme via post-it notes, hardcopy / online survey. • Build community support for the proposed phase 2 works. • Officers obtain clear direction on long-term aspirations for Front Street, eg pedestrianisation. However, if this is not possible, officers will better understand contradictory views to enable further feasibility work. • Start to canvas volunteers for Friend of Front Street community group, to provide much need local community activities / events post March 2025. <p>The proposed scope of phase 2 work will contribute to the delivery of key commitments in: the Council Plan (2023-27); and the three 10-year strategies approved in 2022, Economic Strategy (2022-2032), Health and Wellbeing Strategy (2022-2032) and Climate Change Strategy (2022-2032). The proposals reflect the four core ‘EACH’ commitments in the Council Plan 2023-27 – One City, for all by:</p> <ul style="list-style-type: none"> • Equalities and Human Rights – creating a more accessible destination • Affordability – creating a more unified destination and encouraging greater use of local amenities via sign posting and better connections. • Climate & Environment – more trees and potential planters will provide welcome placemaking. • Health and Wellbeing – more family friendly space encourages people to dwell in, build stronger social interactions across the generations and reduce social isolation. Seek volunteers for “Friends of Front Street” group to build on the strong community spirit that exists.
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Step 2 – Gathering the information and feedback

2.1	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?
	<ul style="list-style-type: none"> • 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.

Source of data / supporting evidence	Reason for using this source
Previous Engagement	<p>During 2020 Future Front Street engagement had over 1200 responses from residents and shoppers and 30 local businesses, the results showed some contradictory views on several areas, including but not limited to maintaining vehicle use within precinct carriageway v long term desire to pedestrianise the precinct.</p> <p>Significant challenge from the local community in relation to installation of the new bollards on Front Street, culminated in the presentation of a petition to Full Council in July 2023, by 'What A Load Of Bollards' Campaign Group titled "Get Front St bollards removed and re-design the scheme in line with what people asked for".</p> <p>In response to this petition and acknowledging the strength of community feeling the council have engaged the original external consultants PWP Design and local urban designer, Urban Glow Heritage to work with the council acting as a critical friend to the design process and assist with looking at creative and longer-term ideas for Front Street.</p> <p>This extensive engagement helped to articulate what people liked, and didn't like about Front Street, and what they would like to see in the future – resulting in The Future of Acomb Front Street Study.</p> <p>The Project team have contacted the Acomb Neighbourhood Plan Group to gain insight from their early 2017/8 SWOT (Strengths, Weaknesses, Opportunities and Threats) analysis and understand their priorities moving forward.</p>
Onsite Trials	<p>At the commencement of phase 1 highway improvement works, the Regeneration team consulted both the Highways Team and the CYC Access Officer to identify potential areas of concern and scope for opportunity.</p> <p>The council had commissioned the MIMA City Centre Accessible Seating Review as part of City Centre Action Plan.</p>

		<p>Working with the CYC Access Officer, the Regeneration team were able to source bespoke accessible seating options to trial options which supported new MIMA accessible seating framework, and incorporated “Happy to Chat” initiative, which helps prevent social isolation.</p> <p>During September and November 2023 two surveys was undertaken to ask residents and stakeholders for their seating preference. Results of which have shaped council Accessible Seating Policy.</p> <p>The Regeneration Team were also aware of the forthcoming Design Guide for City Centre Cycle Parking, with particular focus on new adapted / cargo bike provision. To test the new adapted racks, prior to full city centre roll out two racks were installed in Front Street, June 2023. Ongoing feedback has been obtained, again to inform city centre roll out.</p>
Design Development		<p>Throughout the development of phase 2 scope of work the Regeneration Team have consulted the CYC Access Officer on improving the Blue Badge car parking provision on Front Street and creating a more people friendly space within the precinct. This collaborative working has ensured phase 2 work to best align with councils Equality Duty and where necessary mitigation measures are applied.</p> <p>The project team will continue to work with stakeholders and community groups to ensure the final detailed design provides compliance to council equalities and human right policy.</p>
Research reports		<ul style="list-style-type: none"> • MIMA City of York – Accessible Seating Review and inclusive Design Framework Jan 2024 • City of York Council Design Guidance for City Centre Parking, May2023 • Future of Acomb Front Street Study 2021
Future engagement strategy		<ul style="list-style-type: none"> • On the 20th February 2024 Executive Member for Transport will be asked to approve the following engagement plan, which will ask residents, visitors and businesses/ traders to test costed options for phase 2. (see Annex C).

	<ul style="list-style-type: none"> The EIA is a living document and will be reviewed throughout project duration.
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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.	
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	Gaps in data or knowledge	Action to deal with this
	Extent of opposing view with the community on long term aspiration to pedestrian the precinct area or adopt “privately maintained area.”	Commission feasibility study on options for vehicle use of the carriageway, to understand cost v expectation
	Community support for proposed phase 2 work	Multiple engagement sessions at various days and times to ensure sufficient opportunity for comment/ feedback, prior to any final/ detailed design
	Policy changes – shared space DfT memorandum	Keep under review

Step 4 – Analysing the impacts or effects.

4.1	Please consider what the evidence tells you about the likely impact (positive negative) on people sharing a protected characteristic, i.e. how significant could the impacts be if we did not make any adjustments?
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Below we have listed the 9 protected Characteristics recognised under the Equality Act.

- Enter here any evidence you already have and what you have learned from you consultation with stakeholders.
- Remember the duty is also positive – so please identify where the proposal offers opportunities to promote equality and/or foster good relations.

Use the following guidance to inform your responses:

Indicate:

- Where you think 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 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.

High impact
(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.

Medium impact
(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

	<ul style="list-style-type: none"> The proposal has the potential to contribute to promoting equality and the exercise of human rights
<p>Low impact (The proposal or process might be equality relevant)</p>	<ul style="list-style-type: none"> 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

Equality Groups and Human Rights	Key Findings / Impacts	Positive (+) Negative (-) Neutral (0)	High (H) Medium (M) Low (L)
Age	All unknown as engagement hasn't commenced. Data analysis will inform/ identify and particular findings / impacts from each group?		
Disability	As above		
Gender	As above		
Gender Reassignment	As above		
Marriage and Civil Partnership	As above		
Pregnancy and maternity	As above		

Race	As above		
Religion and belief	As above		
Sexual orientation	As above		
Could other socio-economic groups be affected e.g. carers, ex-offenders, low incomes, including:			
Carer	As above		
Low income groups	The economic benefits to residents with low incomes should be documented in the Equalities Impact Assessment as part of the consultation, and how the proposals will contribute to a thriving affordable economy for all residents to benefit from, including those for whom transport out of area to access low cost retail options is unaffordable.		
Veterans, armed forces community	As above		
Other	As above		
Human Rights: List any impacts on Human Rights:			

	As above
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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?
	No feedback yet to make as consultation has not happened yet

Step 6 – Recommendations and conclusions of the assessment

6.1	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.	
	Important: If there are any adverse impacts you cannot mitigate, please provide a compelling reason in the justification column. There are four main options you can take:	
	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.
	Option Selected	Conclusion / justifications
	Unknown at this stage	No feedback yet to make as consultation has not happened yet

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.			
	List below the actions that have been identified and who will be responsible to carrying them out. Add as many lines as you need.			
	Impact / Issue	Actions to be taken	Person Responsible	Timescale

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?
	Following the open public engagement officers will review all responses to ensure the scope of phase 2 reflects the community’s aspirations, and detailed costed plans will be presented to Executive in July 2024 for consideration.