**City of York Council**

# Equalities Impact Assessment

## Who is submitting the proposal?

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| **Directorate:** | City Development |
| **Service Area:** | City Development |
| **Name of the proposal :** | York Christmas Market 2025 – Implementation of Temporary Anti-Terrorism Traffic Regulation Order. |
| **Lead officer:** | Garry Taylor |
| **Date assessment completed:** | 16.9.25<br>(updating previous assessment 05/09/23 'Consideration of changes to the City Centre Traffic regulation order Review of decision to remove blue badge exemption for city centre access during the pedestrian hours') |

**Names of those who contributed to the assessment :**

| Name | Job title | Organisation | Area of expertise |
|---|---|---|---|
| Ben Murphy | Head of City Development | CYC | City development |
| *Helene Vergereau** | *Traffic and Highway Development Manager* | *CYC* | *Transport* |
| *Darren Hobson** | *Traffic Management Team Leader* | *CYC* | *Transport* |
| *James Gilchrist** | *Director of Transport Environment and Planning* | *CYC* | *Transport* |
| *David Smith** | *Access Officer* | *CYC* | *Access* |

*In respect of original 2023 EIA – italic text refers throughout

## Step 1 – Aims and intended outcomes

| 1.1 | What is the purpose of the proposal? |
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| | This EIA has been prepared to support an Executive Decision around the operation of York Christmas Market 2025, and specifically the implementation of a temporary Anti-Terrorism Traffic Regulation Order (ATTRO) which would prevent all vehicles from accessing the area protected by Hostile Vehicle Measures (HVM) for the full period of the 2025 Christmas Market (including its full operating hours 10am- 7pm).<br><br>A related decision was made by Executive in November 2024, supported by an EIA undertaken in 2023 which considered the reinstatement of blue badge access to some of the pedestrianised streets (Blake Street, Lendal, S. Helen's Square. Goodram Gate - between Deangate and King's Square, Church Street, King Square and Colliergate) following its earlier removal (and which reinstatement was subsequently approved by members and implemented). Given the closely related equalities issues under consideration across these three key decisions, much of the original 2023 discussion and context setting is reincluded in this EIA.<br><br>In November 2021, the Executive took the decision to permanently remove the exemption which had previously allowed blue badge holders vehicular access to some of the pedestrianised streets, namely Blake Street, Lendal, S. Helen's Square. Goodram Gate (between Deangate and King's Square), Church Street, King Square and Colliergate.<br><br>The extant TRO prohibited vehicles from accessing the footstreets between 10.30am and 5pm every day, historically there was an exemption for vehicles with a Blue Badge on the streets listed above. Other exemptions apply for emergency vehicles and where access has been permitted by the Highway Authority (waivers).<br><br>The decision to remove access in November 2021 was based on over 18 months of public engagement with residents, businesses and interest groups including disability groups. An EIA was also completed in 2021 as part of the November decision session |

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| | https://democracy.york.gov.uk/documents/s153763/Annex%20AA%20Blue%20Badge%20Exemption%20Removal%20EIA.pdf<br><br>In 2023 the new administration wished to review that decision and reinstated blue badge access.<br><br>This decision was informed by additional consultation on the principles of reinstating blue badge access on the same principles as previously which also informed the EIA.<br><br>This EIA considers the alternative approaches and supports decision makers in weighing up the conflicting issues in considering the implementation of the ATTRO, which would have the effect of removing access for blue badge holders over the extended footstreet hours during the Christmas market.<br><br>• The November 2021 report identified the significant impact that some blue badge holders would be excluded from the vehicular access to the pedestrianised streets as a result of the decision and others would find access harder. This became lived experience and a significant campaign to "Overturn the Ban" took place. Reinstating blue badge access therefore reinstated and improved access for those blue badge who had been impacted.<br>• In striking a balance decision makers considered public safety and avoiding danger to persons in areas of high footfall, recognising the Council's duty to protect the public from terrorism. By permitting access it changes the risk of a vehicle as a weapon (VAW) or Improvised Explosive Device (IED) attack.<br>• The number of vehicles accessing the streets listed above changes the risk of conflict between vehicles and pedestrians, particularly in busy periods;<br>• It would reduce the use of some areas of the carriageway or footways as pavement café areas during footstreet hours, with impact on the amenities of the footstreet area; |

| 1.2 | **Are there any external considerations?** (Legislation/government directive/codes of practice etc.) |
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| | Relevant legislation includes:<br><br>• 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.<br>• 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 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.<br>• Inclusive Mobility Guidance (Department for Transport 2005)<br>• Protect Duty consultation documents (www.gov.uk/government/consultations/protect-duty)<br>• Hostile Vehicle Mitigation guidance (www.gov.uk/government/publications/crowded-places-guidance/hostile-vehicle-mitigation-hvm#vehicle-as-a-weapon-vaw)<br>• The Blue Badge scheme: rights and responsibilities in England (www.gov.uk/government/publications/the-blue-badge-scheme-rights-and-responsibilities-in-england)<br>• Road Traffic Regulation Act 1984 and associated regulations relating to TROs, under which local traffic authorities in England and Wales (outside London) may make permanent orders for the following purposes:<br>  ○ To avoid danger to persons or other traffic using the road or any other road or to prevent the likelihood of any such danger arising; |

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| | ○ To prevent damage to the road or to any building on or near the road;<br>○ To facilitate the passage on the road or any other road of any class of traffic (including pedestrians);<br>○ To prevent the use of the road by vehicular traffic of a kind which, or its use by vehicular traffic in a manner which, is unsuitable having regard to the existing character of the road or adjoining property;<br>○ To preserve the character of the road in a case where it is specially suitable for use by persons (…) on foot;<br>○ To preserve or improve the amenities of the area through which the road runs; or<br>○ To preserve or improve local air quality.<br>• The Business and Planning Act which creates a de-regulated approach to pavement cafes.<br>• The Terrorism (Protection of Premises) Bill (or Martyn's law), has also now achieved royal assent, and entered into a period prior to full implementation by April 2027. |

| 1.3 | **Who are the stakeholders and what are their interests** |
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| | Key stakeholders for this proposal are road users including motorists, pedestrians, and Blue Badge holders who were able to access and park in the streets listed above during footstreet hours before the temporary changes were made to the access exemptions, which were then made permanent in the November 2021 report.<br><br>It is wrong to assume that all Blue Badge holders' feel the same way about what has happened or what should happen, but this is now based on significant and lived experience in a post pandemic world. There have also been changes in Council policy most notably by changing the conditions under which pavement cafes will be permitted.<br><br>Other stakeholders include: |

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| | • Other groups visiting the pedestrian area and accessing its shops and services; and<br>• City centre businesses and service providers (e.g. deliveries, trades, etc).<br>• North Yorkshire Police and relevant anti-terrorism organisations<br><br>Their interests are wide ranging and include suitable access by a range of transport modes (private car, taxi/private hire, deliveries, cycling, walking), safety, and services and amenities available in the footstreet area. |
| **1.4** | **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. |
| | The new Council Plan contains four key commitments one of which is Equalities and Human Rights - Equality of opportunity and states<br><br>"We will create opportunities for all, providing equal opportunity and balancing the human rights of everyone to ensure residents and visitors alike can benefit from the city and its strengths. We will stand up to hate and work hard to champion our communities"<br><br>The decision seeks to balance the<br>• impact on blue badge holders of any decision to exclude access to some of the pedestrianised streets during the extended footstreets hours in the Christmas market period, and the exclusion this has had on some groups.<br>• public safety and avoid danger to persons in areas of high footfall to reduce the risk of a vehicle as a weapon attack and the level of conflict between vehicles and pedestrians more generally, particularly in busy periods;<br>• the use of some areas of the carriageway or footways as pavement café areas during footstreet hours, improving the amenities of the footstreet area |

## 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?** 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. |
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| **Source of data/supporting evidence** | **Reason for using** |
| **Public consultation** | <u>Consultation on Principles of reinstating blue badge access</u><br><br>• Principle 1 - Return to previous access – This principle aims, subject to full consultation, to revert to the Blue Badge accessibility measures that were in place before the emergency COVID measures and the Council's decision of November 2021 to make them permanent.<br>83% Agree, 12% Disagree, 5% Don't know<br>Total responses = 2867<br><br>• 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).<br>61% Agree, 32% Disagree, 7% Don't know,<br>Total responses = 2870 |

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| | • 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.<br>88% Agree, 7% Disagree, 5% Don't know<br>Total responses = 2866<br><br>• Principle 4 - Finding solutions – the Council Executive agrees to restore Blue Badge access through the new hostile vehicle barriers, then the council will work with Blue Badge holders on the detailed ways to achieve this<br>90% Agree, 5% Disagree, 4% Don't know<br>Total responses = 2858<br><br>• Principle 5 - Longer term improvements – The Council is committed to considering and implementing longer-term improvements to accessibility in the city, taking into consideration the needs and opinions of the community on an ongoing basis, including in the development of its Transport Strategy<br>89% Agree, 4% Disagree, 7% Don't know<br>Total responses = 2861<br><br><u>Reverse The Ban Petition</u><br>In October 2022 a Reverse the Ban Post Card Campaign was submitted to the council. This can be summarised as follows:<br>• 2,734 cards received,<br>• 2,074 were residents, |

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| | • 660 were visitors including people who work in York or visit York regularly from the surrounding areas and tourists,<br>• 677 responses contained additional written comments of which<br>  ○ 231 of which reference to the rights of disabled people under the Human Rights Act / disability discrimination,<br>  ○ 141 sight personal experiences including how the change has affected them emotionally,<br>  ○ 86 references to no longer being able to get into the city centre,<br>  ○ 15 references to political parties,<br>  ○ 4 references to terrorist activities<br><br><u>My City centre engagement</u> – this was an engagement with residents, businesses and special interest groups. This was an open discussion around what the city centre could look like in the future and was the foundation for the November 2020 Executive report.<br><br><u>City Centre Access Project</u> - 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 response to the threat of terrorism as outlined in the report, and particularly the use of hostile vehicles as a potential mode of attack. This had 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.<br><br><u>Temporary Covid measures</u> – 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 |

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| | 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.<br><br><u>Additional consultation undertaken for the November 2021 Decision to permanently remove blue badge access</u> – A consultation took place to review available Blue Badge Parking on the outskirts of the city centre in April 2021. This took the form of an online questionnaire and two online workshops on 22 April 2021, one during the working day and one in the evening, to allow those working in disability organisations and professional advocates to attend, while also offering an out of office hours opportunity for those who may want to take part but are at work or unavailable during the day. This consultation was promoted through the media, on social media (tagging disability organisations), and to the following organisations: Alan Bott Charity, York Disability Rights Forum, York Human Rights City, York Programme for UN International Day of People with Disabilities, Jorvik Deaf Connections, Lollipop, York People First, MS Society, Older Citizens Advocacy York, Wilberforce Trust, Healthwatch York, My Sight York, York Carers Centre, York Carers Forum, York Parent Carer Forum, Age UK York, Converge (York St |

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| | John), Mind, York Advocacy (Mind), Learning Disability Self Advocates Forum, York Self Advocacy Forum, York Inspirational Kids, York Access and Mobility Club Facebook Group, York Older People's Assembly, York Dementia Action Alliance, CVS, York Wheels, Dial and Ride, Shopmobility, Inclusive Engagement, Individuals from CCA Exercise, Labour Women's Officer, York Cycle Campaign, Get Cycling, Sight Loss Council, York Accessibility Action, Action on Hearing Loss, British Deaf Association, York Disability Week, York ME Community, Blueberry Academy, and York Alzheimers.<br><br>The engagement followed an open conversation approach, both online and offline, including direct conversations with individuals and advocacy groups. This allowed detailed discussions to take place with those who wished to engage in depth, and captured general views through an online survey, which was distributed to nearby residents, city centre businesses, and paper based questionnaires distributed across the city as requested. In total there were 540 survey responses completed, of the completed surveys 270 were completed by residents who are Blue Badge holders, 65 by residents who are not Blue Badge holders, 69 by carers of a Blue Badge holder, 7 from businesses (including taxi drivers) and 129 skipped the question.<br><br><u>Statutory consultation for the November 2021 Decision</u> - The statutory consultation for the amendment of the TROs was advertised on 9th July 2021, with an original end date of 6th August 2021, which was extended until 13th August 2021. 206 representations were received on the proposal to remove Blue Badge access exemptions, 5 in support and 201 against the proposal and detailed in the November 2021 report. |

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| **Research Report** | For the August 2019 Executive report, approving the permanent changes to the Traffic Regulation Order to deliver the Phase 1 Hostile Vehicle Mitigation proposals in the city centre, an independent review of Blue Badge Parking Access was also commissioned from Parking Perspectives a consultancy specialising in parking.<br>In addition, Disabled Motoring UK, a charity and advocacy group for disabled people, were commissioned to produce an independent review of York's disabled access offer.<br>Martin Higgitt Associates also produced an independent report<br>The November 2020 Executive also commissioned a Strategic Review of City Centre Access in order to identify potential improvements to city centre access |
| **Surveys** | <u>City Centre Access project</u><br>As part of this work, parking surveys were undertaken in the streets listed above in May 2019. This shows 86 parking events/day in the Goodramgate corridor, of which 80 vehicles displayed a Blue Badge. 86 parking events/day were also recorded on the Blake Street corridor, of which 49 vehicles displayed a Blue Badge.<br><br><u>Traffic surveys undertaken in 2018 and 2021</u> – Traffic surveys in the listed streets were undertaken as part of the City Centre Access project in 2018 and repeated in 2021. This shows the following number of vehicles accessing the streets listed below between 10.30am and 5pm (pedestrianised hours):<br>• Blake Street<br>o Weekday: 139 motorised vehicles in 2018, 12 in 2021<br>o Saturday: 100 motorised vehicles in 2018, 4 in 2021<br>• Lendal<br>o Weekday: 161 motorised vehicles in 2018, 30 in 2021 |

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| | o Saturday: 106 motorised vehicles in 2018, 23 in 2021<br>• Colliergate<br>o Weekday: 80 motorised vehicles in 2018, 39 in 2021<br>o Saturday: 106 motorised vehicles in 2018, 27 in 2021<br>• Goodramgate<br>o Weekday: 2018 data unavailable, 11 in 2021<br>o Saturday: 106 motorised vehicles in 2018, 4 in 2021 |
| **Experience of permitting access to blue badge holders between the hours of 5-7pm during the 2024 Christmas Market operations** | This ability resulted in an average of one vehicle per day using the facility, though it is accepted that the period permitted was outside of normal business operating hours, and that more holders would potentially have used the facility over a longer period. |

## 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** |
| Medium and long term policy and technology context | The Council has always committed to keep the operation of hostile vehicle mitigation measures under review, this is because the terror threat will change and potentially require adjustment, either allowing restrictions to be relaxed or potentially tightened bases upon threats.<br><br>The medium term impact has already seen a change in council policy for instance the change to keeping 1.5 metres of footway clear. The ongoing lived experience is better understood but the ongoing exclusion has the potential to have greater impacts not just on those excluded but on the way the city centre business and uses respond to the restrictions.<br><br>Therefore keeping any decisions under review is essential and the options outlined in the report seek to permit this to happen in agile way such as the Anti Terrorism Traffic Regulation Order. If blue badge access is permitted keeping under review new and emerging technology solutions could potentially different access solutions in the future. |

## Step 4 – Analysing the impacts or effects.

| 4.1 | **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?**<br><br>NB impacts framed from the perspective of restricting Blue Badge access during the extended footstreet hours in line with ATTRO | | |
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| **Equality Groups and Human Rights.** | **Key Findings/Impacts** | **Positive (+) Negative (-) Neutral (0)** | **High (H) Medium (M) Low (L)** |
| **Age** | Older people are more likely to hold a blue badge and their inability to drive and park in the pedestrianised streets will impact exclusion and the distance those with reduced mobility have to travel on foot or using a wheelchair or mobility scooter, making shops and services in the footstreet area less accessible during footstreet hours. This is also applicable to families with young children where a family member is a blue badge holder. Restricting broader blue badge access would have a high negative impact for these groups.<br><br>However, some older people supported the removal of blue badge holder access and would benefit from the reduction in the number of vehicles accessing the footstreet area, as it creates a safer, mainly car free, environment. Younger people, especially young children and families would also benefit from a reduced number of motorised vehicles in the streets listed above | Mixed positive and negative | Negative High<br><br>Positive medium |

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| **Disability** | As identified in the original report the exclusion of blue badge holders has a very significant impact on some blue badge holders, where as some people living with a disability/mobility impairment have previously identified benefits of an exemption. This applies to the extended footstreet hours during the Christmas market period, though positive impacts at this time are reduced by virtue of the range of businesses and services accessible at this time.<br><br>Negative impacts (high) – Should blue badge access be permitted, people living with a disability/impairment are more likely to hold a blue badge and to have used the streets listed above for access to and to park in the city centre.<br><br>Allowing the ability to drive and park in these streets will decrease the distance disabled people have to travel on foot or using a wheelchair or mobility scooter, making the footstreet area more accessible during footstreet hours.<br><br>Many respondents to previous consultations and workshops have stated that the removal of blue badge parking and vehicular access has precluded them entirely from accessing the city centre during footstreets hours. This means that they haven't be able to access the services available in the footstreets.<br><br>Positive impacts (medium) –Some people living with a disability have supported the removal of the access exemption for blue badge holders benefiting from the | Mixed positive and negative | Negative - High<br><br>Positive – Medium |

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| | reduction in the number of vehicles accessing the footstreet area, making it a safer, mainly car free, environment for all users.<br><br>This is particularly the case for those with visual impairments and others who identify as disabled or live with mobility issues, but do not rely on a car and blue badge parking.<br><br>These users have previously generally noted the positive impact of the reduction in vehicles in the streets, reducing the risk of conflict and enabling then to use the carriageway to travel along the streets, often providing a more even, wider area, compared to using the narrow footways available in many parts of the city centre. | | |
| **Gender** | No differential impacts identified | Neutral | |
| **Gender Reassignment** | No differential impacts identified | Neutral | |
| **Marriage and civil partnership** | No differential impacts identified | Neutral | |
| **Pregnancy and maternity** | The proposals have been identified as having a mixed 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, as they may be eligible for a blue badge.<br><br>By restricting blue badge access, women living with pregnancy related mobility impairments who may hold a blue | Miked: Positive and Negative | Negative High |

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| | badge would be less able to access the city centre during the Christmas markets operation. The absence of this ability increases the distance people living with disabilities/impairments have to travel on foot or using a wheelchair or mobility scooter, making shops and services in the footstreet area less accessible during footstreet hours.<br><br>Allowing blue badge holders' vehicles into the pedestrianised are would however have negative impacts for mothers, fathers and carers of young children as these groups tend to benefit from significant reductions in motorised traffic during pedestrianised hours, providing a safer environment for young children. | | Positive - medium |
| **Race** | No differential impacts identified | Neutral | |
| **Religion and belief** | The proposals have been identified as having a mixed impact on access to places of worship in the footstreet area for people who live with reduced mobility or a disability and have a blue badge.<br><br>The key considerations (both positive and negative) are as those described above for older people and people living with a disability and apply to access to the St Sampson's Centre (Church Street), The Holy Trinity Church (Goodramgate), St Helen's Church (Stonegate), and St Martin le Grand (Coney Street). | Mixed: Positive and Negative | Medium |
| **Sexual orientation** | No differential impacts identified | Neutral | |

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| **Other Socio-economic groups including :** | **Could other socio-economic groups be affected e.g. carers, ex-offenders, low incomes?** | | |
| **Carer** | The impact on carers, considering carers who may care for an adult or child living with a disability or impairment and eligible for a Blue Badge, reflects the impacts (both positive and negative) on those living with disabilities, as described above. | Mixed: Positive and Negative | Mixed: Positive and Negative |
| **Low income groups** | No differential impacts identified | Neutral | |
| **Veterans, Armed Forces Community** | No differential impacts identified | Neutral | |
| **Other** | **Not applicable** | **n/a** | **n/a** |
| **Impact on human rights:** | | | |
| List any human rights impacted. | The Convention rights applicable are:<br>• 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. Excluding of vehicular traffic will serve to protect the right to life by reducing risk associated with terrorism attach | Mixed: Positive and Negative<br><br>Positive (Article 2) | Mixed: Positive and Negative<br><br>High |

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| | • 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.<br>• Article 14 - protects the right to be free from discrimination when enjoying other rights, such as Article 8.<br><br>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. 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.<br><br>The removal of blue badge access and parking has 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. | Negative (article 8)<br><br>Negative (Article 14) | High<br><br>High |

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| | Should blue badge access be allowed to access the area, the risk profile is elevated in terms of right to life and potential threat to this.<br><br>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. | | |

**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.

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| **High impact**<br>(The proposal or process is very equality relevant) | There is significant potential for or evidence of adverse impact<br>The proposal is institution wide or public facing<br>The proposal has consequences for or affects significant numbers of people<br>The proposal has the potential to make a significant contribution to promoting equality and the exercise of human rights. |
| **Medium impact**<br>(The proposal or process is somewhat equality relevant) | There is some evidence to suggest potential for or evidence of adverse impact<br>The proposal is institution wide or across services, but mainly internal<br>The proposal has consequences for or affects some people<br>The proposal has the potential to make a contribution to promoting equality and the exercise of human rights |
| **Low impact**<br>(The proposal or process might be equality relevant) | There is little evidence to suggest that the proposal could result in adverse impact<br>The proposal operates in a limited way<br>The proposal has consequences for or affects few people<br>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 | **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?** |
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By restricting blue badge access during the extended hours, it will reduce the number of vehicles in the pedestrianised streets. This changes the risk profile in two aspects.

- The intrinsic risk of vehicles in an area that there is a public expectation of no vehicles in, as it is otherwise pedestrianised, does increase the risk of accidents between pedestrians and vehicles. This risk could be mitigated by ensuring that access is limited to those streets that blue badge holders previously had access to. This risk can also be further mitigated by removing the access for the busiest hours and events.
- The presence of additional vehicles in the blue badge area means they can be used anywhere in the secure zone as a weapon, not necessarily by their owner nor have anything to do with a legitimate Blue Badge holder. This risk could be reduced with the adoption of robust access management protocols, counter terrorism training of relevant staff permitting access, and the restriction of onward travel/ movement within the protected area. Whilst we will maintain robust access management protocol, security teams will still use disability awareness and common sense with regards to access of blue badge spaces.

## 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. There are four main options you can take:** |
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- **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.

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

| **Option selected** | **Conclusions/justification** |
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| Continue with the proposal | In making a decision the council must be able to have considered that the decision is a proportionate means of achieving a legitimate aim.<br>As presented above and in the main report, the decision has to balance:<br><br>• Allowing Blue Badge access to pedestrianised streets within the hostile vehicle mitigation measures making areas of the city centre accessible to |

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| | those completely excluded and more accessible to others who were affected by the changes<br>• Public safety and avoid danger to persons in areas of high footfall, supporting the implementation of hostile vehicle mitigation measures to reduce the risk of a vehicle as a weapon attack;<br>• The level of conflict between vehicles and pedestrians in the footstreets, particularly in busy periods; |

## 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. | | |
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| **Impact/issue** | **Action to be taken** | **Person responsible** | **Timescale** |
| Balancing of competing needs to arrive at optimal ongoing approach to access. | If option to allow blue badge access is progressed, monitor usage over the 2025 period to inform future decisions. | Transport service | By January 2025 |
| | | | |
| | | | |

## Step 8 - Monitor, review and improve

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|---|---|
| **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? |
| | The impacts of the proposal will continue to be monitored through the following activities:<br>• Ongoing liaison with blue badge holders;<br>• Ongoing consultation and liaison with communities of interest;<br>• Continuous review of the impact of highway measures, changes to government guidance, and compliance with equalities; guidance, and implement any mitigations |

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