

City of York Council and Centre for Applied Human Rights
Human Rights and Equality Assessment Tool (HREA)

Who is submitting the proposal?

Directorate	Environment and Regulatory Services		
Service Area	Environment and Regulatory Services		
Name of proposal	Permanent Anti-Terrorism Traffic Regulation Order		
Lead Officer	Dave Atkinson, Director of Environment and Regulatory Services		
Date Assessment Started	2025		
Date Assessment Completed	26.08.26		
Names of those who contributed to the assessment			
Name	Job Title	Organisation	Area of Expertise
Darren Hobson	Highway Regulation Manager	CYC	Highways and Transport
Helene Vergereau	Head of Highway Management	CYC	Highways and Transport
Laura Swiszczowski	Head of Equity, Diversity and Inclusion	CYC	Equity, Diversity and Inclusion

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. Consider using Age 9 English.
	The proposal is to introduce a permanent Anti-Terrorism Traffic Regulation Order (ATTRO) for the city centre (pedestrianised area and area near the Minster) – see information provided in Annex E1
1.2	Are there any external considerations?
	Legislation / government directive / codes of practice etc.
	The proposal for a permanent ATTRO was made following a recommendation from the Chief Constable of North Yorkshire Police (Annex D). Section 22C of the Road Traffic Regulation Act 1984 Counter-Terrorism Act 2008 and the Counter-Terrorism and Border Security Act 2019 Human Rights Act 1998 & Equality Act 2010
1.3	Who are the stakeholders and what are their interests?
	Consider both internal and external stakeholders.
	City centre businesses and residents, events organisers, the Police and emergency services Visitors to the city centre and the Minster Blue Badge holders who currently access the pedestrianised area with vehicles when permitted 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?
	Explain what outcomes you want to achieve for stakeholders, staff and the wider community. Demonstrate how the proposal links to the Council Plan (2023- 2027) and other corporate strategies and plans. Highlight how the proposal meets the objectives of Equalities, Affordability, Climate and Health.
	The implementation of a permanent ATTRO (replacing the current arrangements where temporary ATTROs are recommended by the Police) would: • Enable decision to be made faster (ATTRO activation, type of access restrictions and protective measures, communications) • Enable all partners to work together to establish a jointly agreed decision-making framework • A summary of this assessment framework could also be shared with event organisers in advance so that they can plan early for the restrictions and/or protective measures they are likely to be required to implement and manage for their event • Enable the Police and the Council to set up delegations within their organisations, so that decisions can be made more effectively, especially in cases where urgent decisions are required Links to the Council Plan (2023- 2027) and other corporate strategies and plans: See Policy Basis for Decision section in the main report

Step 2 – Resources utilised

3.1	What sources of data, evidence and consultation feedback have you used to help 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.	
	Source of data / supporting evidence	Reason for using this source
	Consultation undertaken for this decision	This is a decision which requires a statutory consultation and all objections must be considered for a decision to be made – consultation responses provide useful information on the impact of the restrictions when an ATTRO (temporary or permanent) is in place
	Previous consultation exercises	Previous decisions linked to city centre access and restrictions provide useful information on the impact of the restrictions

Step 3 – Screening the impacts or effects.

3.1	Equality-related obligations derive from the Equality Act of 2010 and the Human Rights Act of 1998.
	Once you have engaged with stakeholders you will need to identify how this proposal impacts on their human rights and equalities. Although table one looks complex, its purpose is to facilitate an initial screening of equalities and human rights impacts of your proposal. Many human rights and equalities will not be affected by the decision you are seeking Executive or Council approval for and so can be left blank. The aim here is to identify pressure points regarding human rights and equalities that require attention. Please see the Appendix for details of the protected characteristics and human rights to consider The rights listed below in the first column are the relevant ones from the Human Rights Act, and the York Human Rights City Network Indicator Report (non-discrimination, education, health and social care, housing, a decent standard of living). The human rights in the Indicator Report were selected by residents of York as their priority rights. In the first row the protected characteristics under the Equality Act are listed, to which 'Everyone' has been added to capture impacts that affect everyone without distinction.

Step 3.1 Table 1 – Screening the impacts or effects

Equalities Human Rights	Everyone	Age including financial, digital exclusion impacts	Disability Including financial, digital exclusion impacts	Gender reassign- ment Including Trans, Non- binary, Intersex	Marriage and civil partnership	Pregnancy and maternity	Race	Religion and belief	Sex	Sexual orientation	Carers inc financial, digital exclusion impacts	Low- income groups inc financial, digital exclusion impacts	Veteran, armed forces community	Those with experience of Care
Right to life*	√													
Prohibition of torture*														
Prohibition of slavery and forced labour*														
Right to liberty, movement and security (including freedom of movement)***														
Right to a fair trial*														
No punishment without law*														
Right to private and family life***		√	√			√		√			√			
Freedom of thought, conscience, and belief***														
Freedom of expression***														
Freedom of assembly***														
Right to marry***														
Right to property***														

Equalities Human Rights	Everyone	Age including financial, digital exclusion impacts	Disability Including financial, digital exclusion impacts	Gender reassign- ment Including Trans, Non- binary, Intersex	Marriage and civil partnership	Pregnancy and maternity	Race	Religion and belief	Sex	Sexual orientation	Carers inc financial, digital exclusion impacts	Low- income groups inc financial, digital exclusion impacts	Veteran, armed forces community	Those with experience of Care
Right to education***														
Right to free elections***														
Right to housing***														

Step 3.2 Table 2 – Assessing the impact of your proposal

Here you will need to record the details on all the impacts identified for both Human Rights and those with Protected Characteristics.

Where you have identified an impact on a protected characteristic/human right in the table above, please indicate whether this is positive or negative and give a description of this impact. If you run out of rows, please add as necessary.

Rights clashes and restrictions

Where rights clash or are being restricted, you will need to explain how the decision has been taken, that the limitation on human rights is provided by law, for a legitimate purpose (justified), and proportionate (the minimum necessary restriction on rights).

Use the following guidance to inform your responses:

First, think about what equalities or rights might be engaged by the proposal, and describe the likely impact of the proposal, and provide an evaluation.

Use the following questions to inform your responses if human rights or equalities are limited or qualified in any way:

- Why are a person's rights being restricted?
- What is the problem being addressed by the restriction on someone's rights?
- Will the restriction lead to a reduction in the problem?
- Does that restriction involve a blanket policy, or does it allow for different cases to be treated differently?
- Does a less restrictive alternative exist?
- Has sufficient regard been paid to the rights and interests of those affected?
- Do safeguards exist against error or abuse?

Table 2

Protected Characteristics or Human Rights	Key findings / impacts	Positive (+) Negative (-) (Neutral (0)	High (H) Medium (M) Low (L)
Age	This decision does not directly affect access rights for people using their vehicle to access the city centre or the Minster area. These rights can be affected by a permanent ATTRO (as proposed) or by a temporary ATTRO (do-nothing scenario). This assessment considers the impact of an ATTRO with strict vehicular access restrictions being implemented but it is important to note that the decision on whether to implement a permanent ATTRO does not affect the likelihood or frequency of such restrictions being put in place. Older people are more likely to hold a Blue Badge and to use a vehicle to access and park in the city centre. Negative impacts (high) - When restrictions implemented under an ATTRO restrict their ability to drive and park in the pedestrianised streets, this result in the exclusion of some people and increases 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. When an ATTRO is implementing, removing Blue Badge access, this has a high negative impact for these groups. Positive impacts (medium) - However, some older people benefit from the reduction in the number of vehicles accessing the footstreet area, especially during busy times such as when events are taking place, as it creates a safer, mainly car free, environment. Younger	Mixed: Positive and Negative	Negative High Positive Medium

	people, especially young children and families also benefit from a reduced number of motorised vehicles in the streets listed above.		
Disability	This decision does not directly affect access rights for people using their vehicle to access the city centre or the Minster area. These rights can be affected by a permanent ATTRO (as proposed) or by a temporary ATTRO (do-nothing scenario). This assessment considers the impact of an ATTRO with strict vehicular access restrictions being implemented but it is important to note that the decision on whether to implement a permanent ATTRO does not affect the likelihood or frequency of such restrictions being put in place. Negative impacts (high) – People living with a disability/impairment are more likely to hold a Blue Badge and to use their vehicle to access and park in the city centre. When an ATTRO (permanent or temporary) removes the ability to drive and park in these streets, this will increase the distance disabled people have to travel on foot or using a wheelchair or mobility scooter, making shops and services in the footstreet area more accessible during footstreet hours. Many respondents to the consultations and workshops have stated that the removal of blue badge parking and vehicular access precludes them entirely from accessing the city centre during footstreets hours. This means that they aren't able to access the services available in the footstreets. Positive impacts (medium) –Some people living with a disability benefit from the reduction in the number of vehicles accessing the footstreet area, especially during busy times such as when events are taking place, making it a safer, mainly car free, environment for all users.	Mixed: Positive and Negative	Negative High Positive Medium

	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. These users have previously generally noted the positive impact of the reduction in vehicles in the streets, reducing the risk of conflict and enabling them 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 reassignment	No differential impact identified		
Marriage and Civil Partnership	No differential impact identified		
Pregnancy and Maternity	This decision does not directly affect access rights for people using their vehicle to access the city centre or the Minster area. These rights can be affected by a permanent ATTRO (as proposed) or by a temporary ATTRO (do-nothing scenario). This assessment considers the impact of an ATTRO with strict vehicular access restrictions being implemented but it is important to note that the decision on whether to implement a permanent ATTRO does not affect the likelihood or frequency of such restrictions being put in place. When an ATTRO (permanent or temporary) is in place, restricting vehicular access to the city centre, this has 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 and when considering people with babies and small children. Impact are similar to those listed under the Disability category.	Mixed: Positive and Negative	Negative High Positive Medium

Race	No differential impact identified		
Religion and Belief	This decision does not directly affect access rights for people using their vehicle to access the city centre or the Minster area. These rights can be affected by a permanent ATTRO (as proposed) or by a temporary ATTRO (do-nothing scenario). This assessment considers the impact of an ATTRO with strict vehicular access restrictions being implemented but it is important to note that the decision on whether to implement a permanent ATTRO does not affect the likelihood or frequency of such restrictions being put in place. When an ATTRO (permanent or temporary) is in place, restricting vehicular access to the city centre, this has a mixed impact on access to places of worship in the footstreet area and to the Minster for people who live with reduced mobility or a disability and have a Blue Badge. 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	Negative High Positive Medium
Sex	No differential impact identified		
Sexual Orientation	No differential impact identified		

Other social – economic groups			
Carer	This decision does not directly affect access rights for people using their vehicle to access the city centre or the Minster area. These rights can be affected by a permanent ATTRO (as proposed) or by a temporary ATTRO (do-nothing scenario). This assessment considers the impact of an ATTRO with strict vehicular access restrictions being implemented but it is important to note that the decision on whether to implement a permanent ATTRO does not affect the likelihood or frequency of such restrictions being put in place. The impact of an ATTRO (temporary or permanent) 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	Negative High Positive Medium
Care Leavers	No differential impact identified		
Low income groups	No differential impact identified		
Veterans and armed Forces	No differential impact identified		
Other	No differential impact identified		
Human Rights (list any rights impacted)			
Right to life	Article 2 - protects the right to life. In this case, its applicability relates to the requirement placed on the Government to take appropriate	Positive	High

	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 is being mitigated with an Anti Terrorism Traffic Regulation Order if the police are aware of specific risks. In making a decision to implement an ATTRO (permanent or temporary) on the recommendation of the Police, 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.		
Right to private and family life	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 includes things like wellbeing, autonomy, forming relationships with others and taking part in our community. Article 14 - protects the right to be free from discrimination when enjoying other rights, such as Article 8.	Negative	High

Step 4 – Gaps in data and knowledge

4.1	What are the main gaps in information and understanding of the impact of your proposal?		
	When conducting your screening, you may have discovered gaps in data or knowledge that make it difficult to assess whether your proposal had a positive or negative impact on human rights/equalities. Please indicate actions you will take to resolve this gap. As your proposal progresses you may be able to resolve this knowledge gap –please indicate when it was resolved.		
	Gaps in data or knowledge	Action to deal with this	Date resolved
	Future impacts on residents, visitors, businesses, event organisers, etc	Continue to monitor impacts and gather feedback when ATTROs are implemented	On-going

Step 5 - Maximising positive impacts

5.1	What has been done to optimise opportunities to advance equality / human rights or foster good relations? As noted above, this decision does not directly affect access rights for people using their vehicle to access the city centre or the Minster area. These rights can be affected by a permanent ATTRO (as proposed) or by a temporary ATTRO (do-nothing scenario). This assessment considers the impact of an ATTRO with strict vehicular access restrictions being implemented but it is important to note that the decision on whether to implement a permanent ATTRO does not affect the likelihood or frequency of such restrictions being put in place. Actions taken to advance equality / human rights or foster good relations include: • Blue Badge access for vehicles available on two corridors in the city centre when no additional restrictions are in place • Mitigation measures implemented for specific events with an ATTRO – For example, for the Christmas Market 2026 will have a rest day on a Tuesday when vehicular access will be permitted for Blue Badge holders on Goodramgate and Colliergate. Another example is Pride 2026 where Blue Badge access was retained on the Blake Street loop during the event. When an ATTRO is requested/activated options for similar mitigation measures are considered and implemented where possible. • The implementation of a permanent ATTRO would support improved communications through an agreed protocol, enabling advanced communication to affected Blue Badge holders (where possible)
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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 HREAT demonstrates the proposal is robust. There is no potential for unlawful discrimination or adverse impact and you have taken all opportunities to advance equality / human rights and foster good relations, subject to continuing monitor and review.
	Adjust the proposal	The HREAT 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
	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
	No major change to the proposal	Although the assessment presented here considers the impact of access restrictions implemented under a permanent ATTRO, this can be implemented currently, under temporary ATTROs, with less time for planning and organising mitigation measures (where possible). The implementation of a permanent ATTRO will not increase the likelihood or frequency of access restrictions but it will help with planning for them and communicating about them.

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 or mitigations 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
	Negative impact of access restrictions when an ATTRO is activated	ATTRO activation framework and communication protocol to be developed with requirements for mitigations in mind to assess all possible options to reduce the impact of access restrictions Equality and Human Rights impacts will be assessed and mitigation measures identified where possible for each instance of the permanent ATTRO being activated	Dave Atkinson	On-going

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, other marginalised groups and human rights going forward? How will any learning and enhancements be capitalised on and embedded?			
	Continue to monitor impacts and gather feedback when ATTROs are implemented			