



<b>Title of EIA</b>		<b>City Centre PSPO Nov 23</b>
<b>EIA Author</b>	Name	<b>Liam Nagle</b>
	Position	<b>Community Safety Officer</b>
	Date of completion	<b>October 2023</b>
<b>Head of Service</b>	Name	<b>Julie Newman</b>
<b>Cabinet Member</b>	Name	<b>Cllr P Hetherton</b>
	Portfolio	<b>Cabinet Member for City Services</b>

<b>EIA</b>	<ul style="list-style-type: none"> <li>• Having identified an EIA is required, ensure that the EIA form is completed as early as possible.</li> <li>• Any advice or guidance can be obtained by contacting Jaspal Mann (Equalities), Mamta Kumar (Equalities), Alicia Philips (Health Inequalities), Lisa Young (Health Inequalities), Emily Stewart (Health Inequalities), Laura Waller (Digital Inclusion).</li> </ul>
<b>Sign Off</b>	<ul style="list-style-type: none"> <li>• Brief the relevant Head of Service/Director/Elected Member for sign off</li> <li>• Have the EIA Form ready for consultation if it is required</li> <li>• Amend according to consultation feedback and brief decision makers of any changes</li> </ul>
<b>Action</b>	<ul style="list-style-type: none"> <li>• Implement project / changes or finalise policy/strategy/contract</li> <li>• Monitor equalities impact and mitigations as evidence of duty of care</li> </ul>

PLEASE REFER TO [EIA GUIDANCE](#) FOR ADVICE ON COMPLETING THIS FORM

**SECTION 1 – Context & Background**

**1.1 Please tick one of the following options:**

This EIA is being carried out on:

- New policy / strategy
- New service
- Review of policy / strategy
- Review of service
- Commissioning
- Other project *(please give details)*



**1.2 In summary, what is the background to this EIA?**

There has been a City Centre PSPO in place since 2017. It has had a condition that allowed officers to insist cyclists dismounted from their bicycles (of all forms) if they were cycling in a dangerous or reckless manner.

Elected members personally noted and members of the public as well as disability groups highlighted the danger posed to pedestrians in the city centre from bicycles.

It is proposed that all cyclists dismount from their cycles as pedestrian safety is compromised to an unacceptable level. We want to ensure that no protected characteristic group is unduly disadvantaged by this proposal. This requirement will also apply to e-scooters.

This requirement will not apply to anyone on a mobility scooter, on an adapted bicycle or as specified in the legal order that means it is not practical for them to dismount, they must however cycle in a safe and considerate manner.

**1.3 List organisations and people who are involved in this area of work.**

- West Midlands Police
- Coventry BID
- Coventry City Council;
- Community Safety
- Licensing
- Highways
- Public Realm
- Legal Services
- Planning
- Disabilities Equality Action Partnership (DEAP)
- Wheels for Well Being
- Respondents to the consultation

**SECTION 2 – Consideration of Impact**

*Refer to guidance note for more detailed advice on completing this section.*

In order to ensure that we do not discriminate in the way our activities are designed, developed and delivered, we must look at our duty to:



- Eliminate discrimination, harassment, victimisation and any other conflict that is prohibited by the Equality Act 2010.
- Advance equality of opportunity between two persons who share a relevant protected characteristic and those who do not.
- Foster good relations between persons who share a relevant protected characteristic and those who do not.

**2.1 Baseline data and information**

- Please include an analysis of the equalities data your service holds. This could include surveys, complaints, compliments, management information and customer profiles. *(Please refer to Diversity Guide)*
- Where possible compare your data to local data using
  - Facts about Coventry
  - Census 2011
  - Census 2021
  - JSNA

2021 Census data shows us that;

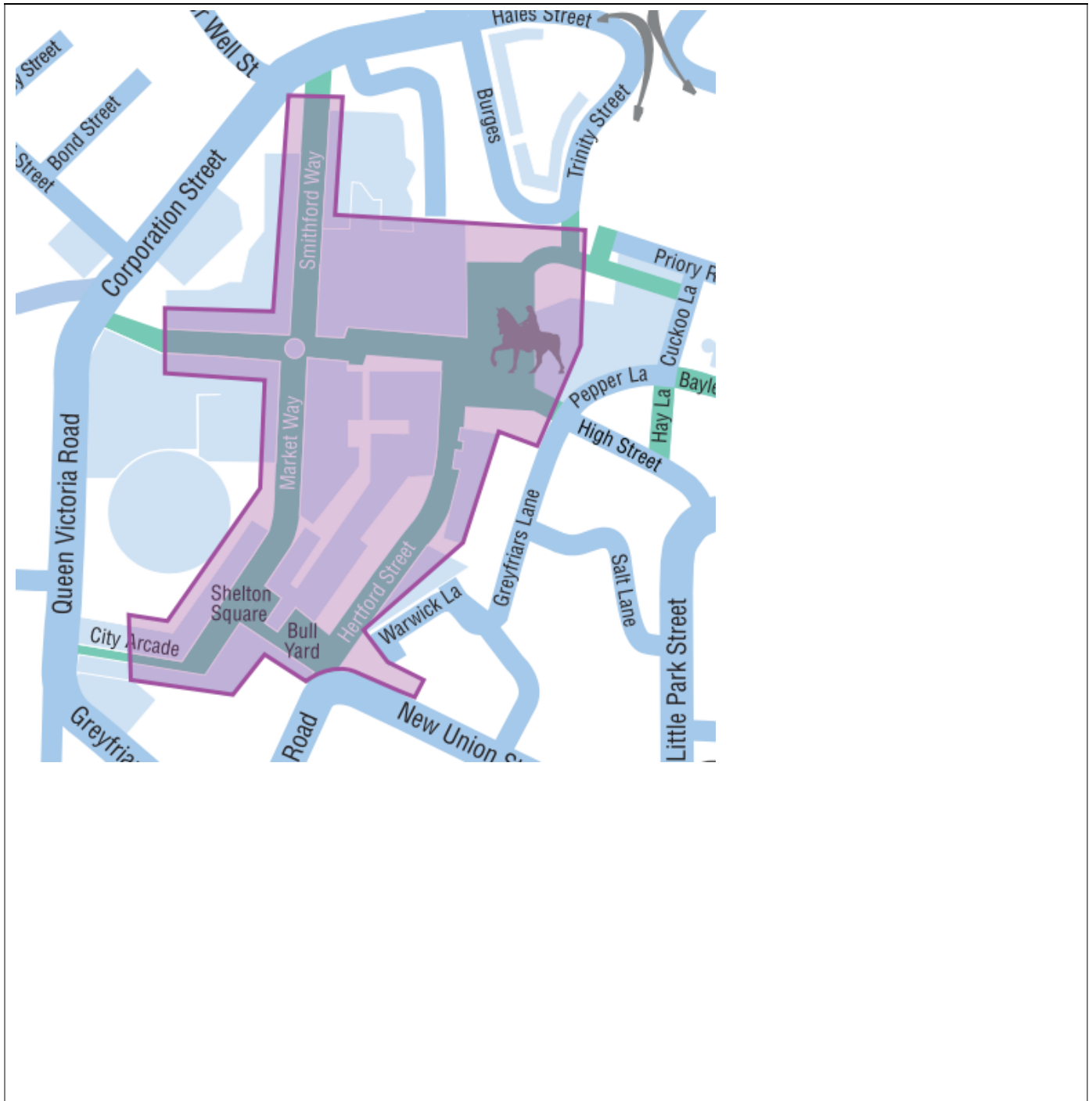
14% of the city are aged 65+

Approximately 20% of the city identify themselves as being disabled and limited to some regard, whether a little or a lot.

In conversations with the Disability Equality Action Partnership (DEAP) they have made several challenges, including personal testimony, regarding many individuals suffering near misses in the city centre as well as anecdotal evidence of people they know have suffered injuries.

There was a public consultation related to the proposed amendments that has just been completed. Approximately 1000 people responded and over 80% stated that they felt the actions of cyclists in the city centre made the city centre less safe for pedestrians.

The restricted area is shown on the attached map.



2.2 On the basis of evidence, complete the table below to show what the potential impact is for each of the protected groups.

- Positive impact (P),
- Negative impact (N)
- Both positive and negative impacts (PN)
- No impact (NI)



*\*Any impact on the Council workforce should be included under question 5.0 – not below*

Protected Characteristic	Impact type P, N, PN, NI	Nature of impact and any mitigations required
Age 0-18	PN	<p>Pedestrian safety will be improved, particularly for very young children who are likely to be unaware of their surroundings and more at risk and unable to take evasive action from a bicycle/e-scooter ridden at speed (Positive).</p> <p>Young people who wish to cycle/e-scooter across the pedestrianised areas will not be able to (Negative).</p> <p>This can be mitigated by dismounting and walking with your cycle or taking an alternative route.</p>
Age 19-64	PN	<p>Pedestrian Safety will be improved from the risk of a collision with a bicycle/e-scooter (Positive).</p> <p>People wishing to cycle/e-scooter across the pedestrianised areas will not be able to (Negative).</p> <p>This can be mitigated by dismounting and walking with your cycle/e-scooter or taking an alternative route.</p>
Age 65+	PN	<p>Pedestrian Safety will be improved from the risk of a collision with a bicycle/e-scooter(Positive).</p> <p>People wishing to cycle/e-scooter across the pedestrianised area will not be able to (Negative).</p> <p>This can be mitigated by dismounting and walking with your cycle or taking an alternative route.</p>
Disability	P	<p>People with visual impairments will be made significantly safer as they are at a higher risk of collision than a sighted pedestrian(Positive).</p> <p>People with mobility issues will be made significantly safer as they are at a higher risk of collision than someone with full mobility (Positive).</p> <p>People with hearing loss will be made significantly safer as they are at a higher risk of collision than someone with full hearing (Positive)</p> <p>Evidence collated by the RNIB have identified concerns that e-scooters could have on the safety, confidence and independence of blind and partially sighted people.</p> <p>Wheels for Well Being are a group advocating for disabled cyclists to ensure they are afforded access and encouraged to use their vehicles to get out and about in Cities. Any exemptions such as the ones proposed within this Order are a positive result for any</p>



		disabled or mobility impaired cyclists that are still able to access the protected zone, providing they ride in a safe manner.
Gender reassignment	NI	Nothing different from the comments in the ages group above.
Marriage and Civil Partnership	NI	Nothing different from the comments in the ages group above.
Pregnancy and maternity	P	Nothing different from the comments in the ages group above.
Race (Including: colour, nationality, citizenship ethnic or national origins)	NI	Nothing different from the comments in the ages group above.
Religion and belief	NI	Nothing different from the comments in the ages group above.
Sex	NI	Nothing different from the comments in the ages group above.
Sexual orientation	NI	Nothing different from the Comments in the ages group above.

**SECTION 3 – HEALTH INEQUALITIES - See the health inequalities pre EIA guidance sheet for this section.**

<b>3</b>	<b>Further information on health inequalities is available on the Intranet</b>
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**3.1 Please tell us how the proposal you are submitting this EIA form will reduce health inequalities:**

The amendment to the City Centre PSPO will reduce health inequalities by supporting some key Marmot principles:

Give every child the best start in life.

Create and develop healthy and sustainable places and communities  
Strengthen the role and impact of ill health prevention.

Pursue environmental sustainability and health equity.

Some of the Marmot principles apply to the built and physical environment people live, the Council wants to encourage citizens to stay active and wishes to make the city centre a safe and welcoming environment for people to visit, to enjoy open spaces and fresh air as



well as get some exercise. We want to encourage people into the city centre, reduce the likelihood of them suffering a serious injury and make pedestrians more confident.

We recognise some may feel that the proposed amendment may deter some people from cycling in the city, however we believe that the inconvenience to cyclists that may need to dismount and walk through the restricted area or take alternative routes, is outweighed by the improvement to pedestrian safety, the likely reduction in serious accidents and injuries and anti-social behaviour.

### **3.2 What information do you have to show you are going to reduce health inequalities:**

There is a bank of evidence on e-scooters to date and e-scooter-related injuries. In January 2020, the Department for Transport (DfT) commissioned Kantar's Public Division to carry out a nationally representative survey of public attitudes and behaviours in relation to e-scooters. The survey was conducted before the implementation of regulatory changes brought in to accommodate e-scooter trials.

Key findings include:

- Eight in ten respondents mentioned at least one disadvantage, with safety being the overwhelming concern (41% mentioned safety of pedestrians and 35% mentioned safety of riders).

House of Lords E-scooters: The road ahead; published Tuesday, 26 July, 2022 highlights the following data on the safety of e-scooters.

Incidents of harm involving e-scooters have been widely reported in recent years. The Department for Transport reported the following provisional casualty figures for 2021:

- 1,280 collisions involving e-scooters, compared to 460 in 2020.
- 309 included one e-scooter with no other vehicles involved in the collision (single vehicle collision), compared to 83 in 2020.
- there were 1,359 casualties, compared to 484 in 2020.
- of all casualties, 1,034 were e-scooter users, compared to 384 in 2020.
- there were nine deaths (all of whom were e-scooter riders) compared to one in 2020.



Campaigners on disability issues have also highlighted the challenges an increase in e-scooter use may pose for pedestrians with disabilities; for example, the Royal National Institute of Blind People highlights:

‘Micromobility vehicles such as e-scooters are extremely difficult for blind and partially sighted people to see, and operate quietly which also makes them difficult to hear. It may not always be obvious to someone using a micromobility vehicle that they are approaching a pedestrian with sight loss. The difficulties in these two groups detecting one another make interactions between the two potentially dangerous.’

Detailed local information regarding accidents with e-bikes has not been obtainable within this report timescales, it is hoped to have information available for the Cabinet Meeting on Nov 7<sup>th</sup>

A Freedom of Information request to the Metropolitan Police <https://www.met.police.uk/foi-ai/metropolitan-police/d/june-2022/reported-casualties-in-accidentscollisions-involving-e-bikes-electric-bikes-2018-2022/> Shows that, despite the 4 years covered, including the Covid Pandemic, there were over 40 serious injuries involving ebikes including one fatality.

The information we have from key partners and anecdotal evidence suggests that people are deterred from visiting the city centre because they feel intimidated and unsafe because of the activities of cyclists in the city centre. By requiring cyclists to dismount in pedestrianised areas we hope to encourage people to visit the city centre, get some fresh air, walk and exercise and improve their mental wellbeing.

Potentially the request to dismount from their bike may deter some individuals but we will have exemptions for those in mobility scooters, the disabled or others unable to dismount from their cycles or e-scooters for a valid reason. Equally the mitigation of needing to either walk with your bike through the defined area or select an alternate route is not a significant inconvenience.

### **3.3 Who/which groups of people might face the biggest health inequalities for your work and why: What can be done to improve health equity for the groups of people you have identified?**

The amendment to the City Centre PSPO will impact on the lives of people who live, work and visit the city. The amendments to the proposed restrictions will impact positively on who face the biggest health inequalities. The implementation of restrictions of e-scooters within the defined areas will contribute to a safer space for all Coventry residents and those who visit the city centre.

Exemptions will be in place for those who are unable to dismount from their cycles or e-scooters; this exemption will include mobility scooters and adapted bicycles. These exemptions will be detailed on the relevant webpage and public signage will inform people that exemptions do apply to the order to dismount.





### 3.4 What can be done to improve health equity for the groups of people you have identified?

We have consulted with stakeholders and forums on the proposed amendment, the findings will inform the implementation of the amendment to the City Centre PSPO, to ensure the proposed restrictions will impact positively, by encouraging the safe use of e-scooters and electric bicycles safely within the permitted infrastructure and reducing the use in the shared spaces in the City Centre; this will provide opportunities for local residents, businesses, visitors to the city travel and use these areas safely improving health equity.

## SECTION 4 - DIGITAL EXCLUSION INEQUALITIES

Please consider the digital exclusion information in the supporting document prior to completing this section.

### 4.1 Starting point:

Thinking of the main aims of your work area that this EIA is for; does your work area impact digital inequalities or exacerbate? Y/N - No

- Does your work assume service users have digital access and skills?
- Do outcomes vary across groups, for example digitally excluded people benefit the least compared to those who have digital skills and access?
- Consider what the unintended consequences of your work might be.

The only aspect of this order that assumes the public will be online will be on signage that will direct them to a website for additional information. The primary information, i.e. cyclists must dismount will be clearly shown on the signage, however the details of what and whom would be exempt from the order would be on the website. As it mainly applies to disabled people and those on mobility scooters we would work with key user groups such as Disability Equality Action Partnership (DEAP) and others to publicise this. Equally free internet access is available at public libraries and other community locations.



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**4.2 Reducing digital exclusion inequalities**

Where are the opportunities for your area to reduce digital exclusion inequalities and embed supports/interventions as part of your work?

N/A
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**5.0 Will there be any potential impacts on Council staff from protected groups?**

N/A
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You should only include the following data if this area of work will potentially have an impact on Council staff. This can be obtained from: [Nicole.Powell@coventry.gov.uk](mailto:Nicole.Powell@coventry.gov.uk)

**Headcount:**

**Sex:**

Female	
Male	

**Age:**

16-24	
25-34	
35-44	
45-54	
55-64	
65+	

**Disability:**

Disabled	
Not Disabled	
Prefer not to state	
Unknown	



**Ethnicity:**

White	
Black, Asian, Minority Ethnic	
Prefer not to state	
Unknown	

**Religion:**

Any other	
Buddhist	
Christian	
Hindu	
Jewish	
Muslim	
No religion	
Sikh	
Prefer not to state	
Unknown	

**Sexual Orientation:**

Heterosexual	
LGBT+	
Prefer not to state	
Unknown	

**6.0 How will you monitor and evaluate the effect of this work?**

The operation of Public Space Protection Orders in the city generally is subject to oversight from Scrutiny Committee. The Disability Equality Action Partnership is an umbrella organisation that looks at disability and equality based issues across the City and has been in regular dialogue with key officers regarding this and other matters and will continue to do so.

<b>6.1</b>	<b>Action Planning</b>	
<b>Issue Identified</b>	<b>Planned Action</b>	<b>Timeframe</b>

**7.0 Completion Statement**



**As the appropriate Head of Service for this area, I confirm that the potential equality impact is as follows:**

- No impact has been identified for one or more protected groups
- Positive impact has been identified for one or more protected groups
- Negative impact has been identified for one or more protected groups
- Both positive and negative impact has been identified for one or more protected groups

**8.0 Approval**

<b>Signed: Head of Service:</b> Davina Blackburn	<b>Date:</b> 13/10/2023
<b>Name of Director:</b> Julie Newman	<b>Date sent to Director:</b> 13/10/23
<b>Name of Lead Elected Member:</b>	<b>Date sent to Councillor:</b>

Email completed EIA to [equality@coventry.gov.uk](mailto:equality@coventry.gov.uk)