

EQUALITY IMPACT ASSESSMENT (EIA)



Title of EIA		City Centre Traffic Improvements: Trinity Street Loop
EIA Author	Name	Faye Griffiths
	Position	Engagement Manager
	Date of completion	March 2023
Head of Service	Name	Rachel Goodyer
	Position	Head of Traffic, City Centre and Street Lighting
Director	Name	Colin Knight
	Position	Director Transportation and Highways
Cabinet Member	Name	Cllr Patricia Hetheron
	Portfolio	City Services

EIA

- Having identified an EIA is required, ensure that the EIA form is completed as early as possible.
- Any advice or guidance can be obtained by contacting Jaspal Mann (Equalities), Mamta Kumar (Equalities), Alicia Philips (Health Inequalities), Lisa Young (Health Inequalities), Laura Waller (Digital Inclusion).

Sign Off

- Brief the relevant Head of Service/Director/Elected Member for sign off
- Have the EIA Form ready for consultation if it is required
- Amend according to consultation feedback and brief decision makers of any changes

Action

- Implement project / changes or finalise policy/strategy/contract
- Monitor equalities impact and mitigations as evidence of duty of care

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)* **City Centre Traffic Improvements: Trinity Street Loop**



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

We want the city centre to be a place where people want to live, work, shop and enjoy leisure activities. We would like more people to use public transport and we want to see less air pollution and noise. We want pedestrians and cyclists to have improved safety. There has also been issues with congestion in this area which has meant delays to bus timetables.

Trinity Street loop area

We will be introducing traffic restrictions on The Burges, Trinity Street, Hales Street and Palmer Lane. We will do this by implementing new Restricted Traffic Zones which introduces a bus gate covering the area. The plan below shows the changes which will be made.



A bus gate is an area that can only be accessed by buses, cycles, taxis or permitted/authorised vehicles. We expect these changes to improve air quality in the city centre and make it a safer and more enjoyable place for local people and visitors. The affected area is already a restricted parking zone, and therefore no diversion routes are needed, so no impact on air quality in other areas.

The changes mean that between 10am and 6pm every day traffic will be restricted on Hales Street, Palmer Lane, Trinity Street and along The Burges.

The loop is already a Restricted Parking Zone (RPZ) and there is already a bus gate on Hales Street, this means that there should be minimum impact on local people, and little impact on other areas. There should also be no increase in journey time for people using the area.



Blue badge parking

Blue badge parking will remain where it currently is and there will be no loss in allocated spaces. Where there are access restrictions, blue badge holders will be able to apply for annual permits to allow access.

1.3 Who are the main stakeholders involved? Who will be affected?

Access Development Group
Age Concern
Bus / coach operators
CCC Independent Travel Team
City centre businesses
City centre healthcare facilities
City centre residents
Coventry University
Culture Coventry
Designing Out Crime/British Transport Police
Disability Groups, including National Federation for the Blind, Guide Dogs Association, Coventry Wheelchair Users
Disability, Equality and Access Panel
Emergency Planning
Food delivery drivers
Historic Coventry Trust
Holy Trinity Church
Local people
Registered Social Landlords
Student accommodation
Taxi drivers
Transport for West Midlands

1.4 Who will be responsible for implementing the findings of this EIA?

Transport and Highways Team

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 a summary of data analysis below, using both your own service level management information and also drawing comparisons with local data where necessary (go to <https://www.coventry.gov.uk/factsaboutcoventry>)

Consultation

In March 2023 a Street News newsletter was delivered to all residents and businesses in and just outside the affected area. This gave detail about the proposal and also promoted a drop-in session where people could find out more and tell us what they thought.

Many of the businesses are food based and rely on people buying their products through delivery companies such as Uber Eats and Deliveroo and they were worried about the impact of the changes on this. As a result of this feedback the restriction times were changed from 10am to midnight, to 10am to 6pm.

Coventry City Centre Accessibility Study

In 2021 the Council's Transport and Highways team commissioned Atkins to undertake a strategic accessibility study of the city centre and provide advice on adjustments and mitigations that would be likely in order to address the Council's Public Sector Equality Duty under the Equality Act. The study outlined recommendations for improvements for people with accessibility issues, and positive and negative impacts of the proposed changes.

Recommendations in the study for this project include:

- Avoid creating administrative systems that could be barriers for people who live outside the city if a permit system were used for areas where restricted access is proposed
- Managing permitted access zones. Such zones present challenges to Blue Badge vehicles' access to the city centre
- It is important to note that pre-registration in order to gain access can in itself be a barrier
- Each area has designated drop-off points that is as close to the key facilities in those areas as and as near to the centre of the city as possible. In practice this could be within car parks, which could provide a short-stay, charge-free time to enable drop-offs to take place

City Centre Personal Injury Collision Data

Between 2017 and 2022 inclusive 17 incidents resulting in injury to pedestrians occurred within the Hale Street, Trinity Street and The Burges loop. Of these:

- 6 incidents were deemed serious and 11 slight severity.
- Of the 6 serious injuries 4 of the injured were over the age of 67 and all were over the 36.
- Of the 11 slight injuries 73% were under 30 with the age of 2 unknown.
- 4 of the 17 injuries were with Females of which was serious.
- 10 of the incidents occurred within the carriageway or at a pedestrian crossing



Bus Journey Times

Transport for West Midlands data shows that there is a general increase in bus journey times in this area over the past four years with the exception of 2020 which is expected to be due to COVID restrictions at the time of survey. Although on most occasions this only adds around a minute to the time it takes buses to get from one stop to the next (this is a 50% rise for most services) there are times when buses are waiting for up to 10 minutes. This is related to the congestion in the area.

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)
- Insufficient data (ID)

**Any impact on the Council workforce should be included under question 2.6 – not below*

Protected Characteristic	Impact type P, N, PN, NI	Nature of impact and any mitigations required
Age 0-18	P	Children and young people may be more vulnerable to the health impacts of air pollution (World Health Organization (2013) Review of evidence on health aspects of air pollution). There is also good evidence for the association between the development of asthma in childhood and traffic-related air pollution.
Age 19-64	P	<p>Those most likely to be affected by air pollution are people with asthma, lung disease, COPD or a cardiovascular disease.</p> <p>Reducing traffic in the area will support the reduction of poor air quality and also make the area more pleasant to walk and cycle in. Keeping physically active in mid life helps to delay the onset and progression of many age related health conditions, including mental health conditions.</p> <p>Many of the owners and employees of the businesses in the affected area will fall within this age range. Many of their businesses rely on delivery services such as Uber Eats and Delivero. During the consultation, businesses fed back that they were worried about the impact of the changes on their businesses and as a result of this, the restriction times have been reduced from 10am to midnight to 10am to 6pm. There is</p>

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		also parking available in Bishop Street car park for delivery drivers, only a very short walk away from the businesses.
Age 65+	PN	<p>People's ability to use sustainable modes of travel can be reduced because of age-related health conditions. Older people may find it difficult undertaking short distances on foot or using public transport, due to impaired mobility and/or poorly maintained paths. Traffic calming and reduction schemes that reduce vehicle speed can increase feelings of personal safety and lead to an increased uptake in walking.</p> <p>Long walking times to access public transport can be a barrier for older people and boarding and alighting public transport can be physically challenging for this group.</p> <p>Older people may be more dependent on private motor cars for their transport needs, sometimes used in conjunction with a Blue Badge parking permit. Schemes which limit or reduce car provision could have a negative impact on this group. However, access to local amenities and use of roads will not change under the proposals. Although older people, residents, businesses and visitors may be required to take an alternative route. Where permits are required to access roads, blue badge holders will be eligible for a permit.</p> <p>Data shows those over aged over 65 disproportionately suffer severe injuries in road traffic collisions and are likely to benefit the most from improved road safety.</p>
Disability		<p>All elements of the affected area will still be accessible via motor vehicle and provision of blue badge parking close to these areas will be retained increasing opportunities for mobility impaired people to enjoy outdoor space and the benefits that that brings. Blue badge holders will need to apply for an annual permit, and where appropriate, can also apply for a permit for carers.</p> <p>Air pollution appears to increase the risk of several chronic diseases that contribute to the progression of disability. This may also support those with neurological disabilities where the environment is currently too challenging.</p> <p>Noise reduction caused by fewer cars will make the zone more enjoyable and easier to navigate for those with sensory issues.</p>

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	PN	<p>Pedestrian routes will remain as they are currently. Any changes to pedestrian routes or access could be confusing for people with visual impairments.</p> <p>Many disabled people rely on taxis to get around and to get close to the businesses or services, access to restricted access zones will remain in the area.</p> <p>Making a journey more difficult and/or confusing or complicated can mean that it becomes a barrier for disabled people leaving the house and visiting shops and services.</p>
Gender reassignment	NI	There is no impact on this group
Marriage and Civil Partnership	NI	There is no impact on this group
Pregnancy and maternity	P	Evidence suggests that air pollution can affect the growth of the unborn baby and may be linked to premature birth. Therefore the reduction in nitrogen dioxide levels brought about by the changes to traffic in the city centre should have a positive impact on this group.
Race (Including: colour, nationality, citizenship ethnic or national origins)	NI	No specific impact on this group
Religion and belief	NI	Access to places of worship will remain
Sex	P	In a national survey, 69% of women surveyed stated that it is too dangerous for them to cycle on the road compared to 53% of men. Reducing traffic will make it safer to cycle on the roads and reduce this barrier to cycling for some women.
Sexual orientation	NI	No specific impact on this group

HEALTH INEQUALITIES

2.3	<p>Health inequalities (HI) are unjust differences in health and wellbeing between different groups of people which arise because of the conditions in which we are born, grow, live, work and age. These conditions influence our opportunities for good health, and result in stark differences in how long we live and how many years we live in good health.</p> <p>Many issues can have an impact: income, unemployment, work conditions, education and skills, our living situation, individual characteristics and experiences, such as age, gender, disability and ethnicity</p>
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<p>A wide range of services can make a difference to reducing health inequalities. Whether you work with children and young people, design roads or infrastructure, support people into employment or deal with welfare benefits – policy decisions and strategies can help to reduce health inequalities</p> <p>Please answer the questions below to help identify if the area of work will have any impact on health inequalities, positive or negative.</p> <p>If you need assistance in completing this section please contact: Alicia Philips or Lisa Young in Public Health for more information. More details and worked examples can be found at https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx</p>	
Question	Issues to consider
<p>2.3a What HIs exist in relation to your work / plan / strategy</p>	<ul style="list-style-type: none"> ● Explore existing data sources on the distribution of health across different population groups (<i>examples of where to find data to be included in support materials</i>) ● Consider protected characteristics and different dimensions of HI such as socio-economic status or geographical deprivation
	<p>Response:</p> <p>Children, young people, old people, babies and disabled people may be more vulnerable to the health impacts of air pollution (World Health Organization (2013) Review of evidence on health aspects of air pollution). There is also good evidence for the association between the development of asthma in childhood and traffic-related air pollution.</p> <p>Data shows those over aged over 65 disproportionately suffer severe injuries in road traffic collisions and are likely to benefit the most from improved road safety</p> <p>Reducing traffic in the area will support the reduction of poor air quality and also make the area more pleasant to walk and cycle in. Keeping physically active in mid life helps to delay the onset and progression of many age related health conditions, including mental health conditions</p>
<p>2.3b How might your work affect HI (positively or negatively).</p>	<p>Consider and answer below:</p>

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<p>How might your work address the needs of different groups that share protected characteristics</p>	<ul style="list-style-type: none"> • Think about whether outcomes vary across groups and who benefits the most and least, for example, the outcome for a woman on a low income may be different to the outcome for a woman a high income • Consider what the unintended consequences of your work might be
	<p>Response:</p> <p>a. Potential outcomes including impact based on socio-economic status or geographical deprivation</p> <p>Reducing traffic will contribute to improved air quality and will encourage the use of public transport, cycling and walking. Combining active travel and public transport options can help people achieve recommended daily physical activities. This also supports the Marmot Principles, "Create and develop healthy and sustainable places and communities" & "Pursue environmental sustainability & health equity".</p> <p>Improving the opportunities for cycling in this area, will support and link to the provision of new cycle routes in the city centre in the future.</p>
	<p>b. Potential outcomes impact on specific socially excluded or vulnerable groups eg. people experiencing homelessness, prison leavers, young people leaving care, members of the armed forces community.</p> <p>Access to employment, health services, education and social events for disabled people will be improved. Those that are able to cycle will benefit from the reduced vehicle traffic and improved bus reliability will support increased public transport use.</p> <p>Ability to use sustainable transport for older people will be positively impacted as traffic calming and reduction schemes can increase feelings of personal safety and lead to an increased uptake in walking.</p>

2.4 Next steps - What specific actions will you take to address the potential equality impacts and health inequalities identified above?

Communicate clearly and appropriately via a number of methods.

Work with DEAP, Access Development Group and other organisations representing disabled people to ensure changes don't negatively impact disabled people.

Ensure permits are available for blue badge holders.



DIGITAL INCLUSION

2.5 The Covid-19 pandemic accelerated the uptake of digital services nationally, whereby people who are digitally enabled have better financial opportunities, can access new information and are better connected to others (Lloyds Consumer Digital Index, 2021). However, for those who are digitally excluded, the digital divide has grown during the last two years, and without intervention people will be left behind with poorer outcomes across employment, health and wellbeing, education and service access. Some people are more likely to be excluded including: older people, people from lower income households, unemployed people, people living in social housing, disabled people, school leavers before 16 with fewer educational qualifications, those living in rural areas, homeless people, or people who's first language is not English ([NHS Digital.](#))

Some of the barriers to digital inclusion can include lack of:

- **Access** to a device and/or data
- **Digital skills**
- **Motivation** to get online
- **Trust** of online safety

Digital exclusion is not a fixed entity and may look different to different people at different times.

Example 1. Person A, has access to a smartphone and monthly data and can access social media apps, however lacks the digital skills and confidence, and appropriate device to create a CV, apply for jobs and attend remote interviews, and/or access educational and skills resources.

Example 2. Person B, is digitally confident and has their own laptop, however due a lower household income and other financial priorities, they cannot afford their monthly broadband subscription and can no longer get online to access the services they need to.

Example 3. Person C has very little digital experience and has heard negative stories on the news regarding online scams. Despite having the financial resource, they see no benefit of being online and look for alternatives whenever possible. A new council service requires mandatory online registration, therefore they do not access it.

It is important that we all consider how we can reduce digital inequalities across our services, and this may look very different depending on the nature of our work.

Please answer the questions below to help identify if the area of work will have any impact on digital inequalities, positive or negative.

If you need assistance in completing this section please contact: Laura Waller (*Digital Services & Inclusion Lead, CCC*). More details and worked examples can be found at [https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-\(EIA\).aspx](https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx)

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Question	Issues to consider	
2.5 What digital inequalities exist in relation to your work / plan / strategy?	<ul style="list-style-type: none"> • 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 application process to apply for a permit in restricted access areas is usually online.
2.5b How will you mitigate against digital inequalities?	<ul style="list-style-type: none"> • If any digital inequalities are identified how can you reduce these? For e.g. if a new service requires online registration you may work with partner organisations to improve digital skills and ensure equitable processes are available if someone is unable to access online. 	
		<p>Response:</p> <p>We will ensure that there is a contact phone number for people to apply over the phone.</p> <p>We will ensure that communication around the changes is not just online. We will use resources such as the Talking newspaper and partners newsletters to ensure communication with protected characteristic groups. We will hold in-person drop-in sessions. We will also share the information with the Community Messengers.</p>

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

Feedback from local people

Feedback from organisations representing protected characteristic groups

Traffic data

2.7 Will there be any potential impacts on Council staff from protected groups?

No

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

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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	

3.0 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

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4.0 Approval

Signed: Head of Service: Jo Shore	Date: 12 th June 2023
Name of Director: Colin Knight	Date sent to Director: 12 th June 2023
Name of Lead Elected Member: Cllr Hetherton	Date sent to Councillor: 14 th June 2023

Email completed EIA to equality@coventry.gov.uk