

Bank Plain / London Street proposals

Equality Assessment – Findings and Recommendations

27 June 2019

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The purpose of an equality assessment

The purpose of an equality assessment is to enable decision-makers to consider the impact of a proposal on different individuals and communities prior to the decision being made. Mitigating actions can then be developed if adverse impact is identified.

The Legal context

Public authorities have a duty under the Equality Act 2010 to consider the implications of proposals on people with protected characteristics. The Act states that public bodies must pay due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act¹;
- Advance equality of opportunity between people who share a relevant protected characteristic² and people who do not share it³;
- Foster good relations between people who share a relevant protected characteristic and people who do not share it⁴.

The full Act is available [here](#).

The assessment process

This assessment comprises two phases:

- **Phase 1** – evidence is gathered on the proposal – looking at the people who might be affected, the findings of related assessments and public consultation, contextual information about local areas and populations and other relevant data. Where appropriate, engagement with residents, service users and stakeholders takes place, to better understand any issues that must be taken into account.
- **Phase 2** – the results are analysed. If the assessment indicates that the proposal may impact adversely on people with protected characteristics, mitigating actions are identified.

When completed, the findings are considered by decision-makers, to enable any issues to be taken into account before a decision is made.

The proposal

This proposal improves highway and public realm amendments in and around the Bank Plain / London Street area of Norwich city centre. The proposal contains the following elements:

- i. Improve the section of London Street at its junction with Opie Street
- ii. Improve the area at the eastern end of London Street, at its junction with Bank Plain
- iii. Improve Bank Plain by widening pavements and re-arranging the on-street parking and loading facilities

- iv. Upgrade Bank Street to create a more pedestrian friendly environment
- v. Widen the light controlled pedestrian crossing on Bank Plain, and include crossing facilities for cyclists
- vi. Remove the existing designated bays (including the car club bay, pay and display bays, blue badge spaces and loading bays) in Bank Street and Opie Street and the existing bus and coach stops
- vii. Create an extended blue badge parking area, motor cycle parking and further loading facilities on the east side of Bank Plain

London Street / Opie Street

The proposals in this area are to repave with new paving designed specifically to take account of the effects of vehicular traffic that has caused such degradation to the area over the past years whilst improving the overall townscape of the area and visually linking the two sections of London Street. It is proposed that the existing parking bays for Blue Badge holders, the car club and the restricted time loading bay on Opie Street will be removed, thus freeing up more space for general loading to take the pressure off the area to be repaved. The Blue Badge spaces will be relocated to a consolidated facility on Bank Plain. This will remove the need to allow any traffic other than that directly servicing the area to enter it via Bedford Street.

London Street junction with Bank Plain

Currently, there is a small turning area here, containing Blue Badge parking bays, and this effectively cuts London Street off visually from Bank Plain. In addition, the paving here has failed and there is a damaged planter along with a few utility cabinets and cycle stands using up what could be a positive public open space with a much closer relationship with Bank Plain. The current turning area will be removed and the area paved in a similar style to the junction at Opie Street, thus providing continuity across the street and creating significant public open space outside OPEN and providing a much improved entrance to London Street. The Blue Badge parking bays will be consolidated onto Bank Plain.

Bank Plain and Bank Street

Bank Plain is not currently an inviting pedestrian environment, but is part of the main link from the station to the City Centre and that is not immediately obvious to visitors to the city.

Maintaining a consistent width of carriageway from St Andrews Street / Redwell Street provides the opportunity to widen pavements, provide dedicated parking and loading bays, and potentially additional street tree planting. This will significantly improve the pedestrian environment and also provide enhanced loading facilities for local businesses. The Blue Badge spaces removed from London Street, Opie Street and Bank Street will all be replaced in a single consolidated block.

The proposals for Bank Street include extending the footways across the junctions at both ends of the street and upgrading the carriageway surface with a more attractive material. The existing footways will be retained as these are already paved and mostly in good condition. Loading will continue to be permitted in Bank Street, but other on-street parking facilities will be removed, with the Blue Badge spaces relocated to Bank Plain.

Who is affected?

The proposal will affect adults, children and staff with the following protected characteristics.

People of all ages	YES
A specific age group (please state if so):	NO
Disability (all disabilities and long-term health conditions)	YES
Gender reassignment (e.g. people who identify as transgender)	YES
Marriage/civil partnerships	YES
Pregnancy & Maternity	YES
Race (different ethnic groups, including Gypsies and Travellers)	YES
Religion/belief (different faiths, including people with no religion or belief)	YES
Sex (i.e. men/women/intersex)	YES
Sexual orientation (e.g. lesbian, gay and bisexual people)	YES

Analysis of the people affected

This proposal affects all current users of the road and pedestrian network in the scheme area – pedestrians, cyclists, public transport users and motorists. This includes users with protected characteristics, e.g. disabled and older users, and younger people and parents.

In recognition of the wide range people affected by these proposals, an extensive consultation exercise was undertaken between 7-30 May 2019. 197 businesses in the area were individually written to and there were public exhibitions of the proposals in City Hall and at OPEN on London Street. Overall, we received 177 responses within the consultation time period.

The Norwich Access Group believed that there is a reduction in Blue Badge parking spaces as a result of the scheme. This issue is outlined below in the 'Potential Impact' section below.

The Norwich Society are supportive of investment and upgrade to pedestrian areas of Norwich City Centre. They were mainly interested with the quality and robustness of materials and integration of street furniture, also hoping for more planting. The Norwich Society wanted reassurance that Blue Badge parking and loading is adequately provided for. This issue is outlined below in the 'Potential Impact' section below.

A majority of respondents were in favour of the proposals in all the categories, with only 28% of respondents not in favour of the scheme overall. This percentage rose to 40% amongst those individuals identifying themselves as disabled (15% of

the total number of respondents), but even in this group, a majority were in favour of the scheme.

The only substantive issues raised (the relocation of Blue Badge parking bays and the removal of the 'turning area') are discussed in the 'Potential Impact' section below.

Potential impact

Relocation of Blue Badge Spaces

The main issues raised have been the removal of the Blue Badge parking bays from Opie Street and the relocation of the Blue Badge parking bays from the top of London Street to Bank Plain.

There has been a suggestion from the Norwich Access Group that the number of spaces is being reduced. There are currently 2 spaces on Bank Street, 2-3 on Opie Street and potentially 4-5 on London Street in the turning area. The current provision is theoretically between 8 and 10 spaces. In practice, this is reduced by 2-3 spaces due to the substantial abuse of the turning area (there are insufficient resources available to enforce) and the awkward shape meaning the true provision is between 5 and 8 spaces. The replacement provision is between 7 and 8 spaces and the group of spaces mean that it is much more likely that a driver will find a space available on arrival. In addition, it is much less likely that they will be abused. Blue Badge holders can also use all the Pay & Display parking bays free of charge for an unrestricted period, and there are 9 of those on Bank Street, which will have level access consequent on these proposals.

Across the City, all available parking spaces adjacent to the pedestrianised areas are dedicated to Blue Badge users, and the numbers have been increased wherever possible as schemes have been implemented.

Removal of Blue Badge spaces in Opie Street

The spaces on Opie Street are being removed for good reasons. Accessing them requires drivers to use Bedford Street, a narrow pedestrianised thoroughfare) with no knowledge of whether spaces will actually be available. This increases traffic levels in the street and across London Street to the detriment of all users here and increases vehicular movement around the City. This issue was raised as a concern by a number of respondents. Consolidating spaces in Bank Plain will ensure that a space is much more likely to be available to all users and minimise the need to hunt around for one. In addition, the signing that we are required to use under national regulations gives many drivers the impression that they can park anywhere in Bedford Street or Opie Street (rather than just in the designated bays, which is the only place they are allowed to park). In the past year alone, 22 Blue Badge holders have been issued with Penalty Charge notices, and many more warned by Civil Enforcement staff before moving on.

The changes will still allow those with severe mobility issues to access London Street and be dropped off just as they can in any other pedestrianised street where access is normally available for vehicles.

It is not possible to achieve the upgrading of the upper part of London Street (the

primary objective of the proposals) without moving the turning area and Blue Badge parking. Overall, the paving of this area received a very high approval. In addition, the area is consistently abused by other users, so although there may theoretically be 4-5 Blue Badge spaces available, in reality this is substantially reduced by vehicles loading and using the cashpoint machine. In addition, the awkward layout means that parking is difficult, and vehicles often park in a way that prevents the area being used efficiently. Its use as a turning area further reduces its value as a parking area for Blue Badge holders and is an unnecessary intrusion in what should be a pleasant public space. Vehicles that really need to turn round in this area have several alternatives available, including the use of Princes Street and Redwell Street in the immediate vicinity.

Accessibility considerations

Accessibility is a priority for Norfolk County Council.

Norfolk has a higher than average number of disabled and older residents compared to other areas of the UK, and a growing number of disabled young people.

London Street was first pedestrianised in 1967 and the paving is now in need of significant upgrading to take account of vehicle movements. This proposal builds on other improvement works being undertaken on Prince of Wales Road and Rose Lane to provide a substantially improved link between the Railway station and the City Centre that benefits all modes of transport. However, it is not possible to achieve the upgrading of the upper part of London Street (the primary objective of the proposals) without moving the turning area and Blue Badge parking.

A comprehensive consultation exercise has been carried out regarding these proposals and all feedback has been fully considered in finalising these plans. The primary concern was around impacts on Blue Badge parking and a perceived reduction in provision. However, this assessment has highlighted the following:

- Whilst the current provision for Blue Badge parking is theoretically between 8 and 10, in practice, the true provision is between 5 and 8 spaces due to substantial abuse of the turning area (there are insufficient resources available to enforce) and the awkward shape
- The replacement provision of Blue Badge parking is between 7 and 8 spaces and the group of spaces mean that it is much more likely that a driver will find a space available on arrival. In addition, it is much less likely that the parking spaces will be abused by vehicles that should not be parked there
- Blue Badge holders can use all the Pay & Display parking bays free of charge for an unrestricted period, and there are 9 of those on Bank Street, which will have level access consequent on these proposals
- Consolidating Blue Badge parking spaces in Bank Plain will ensure that a space is much more likely to be available and minimises the need to hunt around for one. The removal of Blue Badge parking on Opie Street also removes the need for drivers to use Bedford Street, which is a narrow pedestrianised thoroughfare, with no knowledge of whether spaces will actually be available
- The proposed highway changes will still allow those with severe mobility issues to access London Street and be dropped off just as they can in any other pedestrianised street where access is normally available for vehicles

Recommended actions

1. If your assessment has identified any adverse impact, set out here any actions that will help to mitigate it.

Action		Lead	Date
1.	Mitigating actions are outlined in the body of this assessment		
2.			

	Action	Lead	Date
3.			

Evidence used to inform this assessment

- Equality Act 2010
- Public Sector Equality Duty
- Consultation

Further information

2. For further information about this equality impact assessment please contact Jeremy Wiggin on 01603 223 117 jeremy.wiggin@norfolk.gov.uk.



If you need this document in large print, audio, Braille, alternative format or in a different language please contact 0344 800 8020 or 18001 0344 800 8020 (Text relay).

¹ Prohibited conduct:

Direct discrimination occurs when someone is treated less favourably than another person because of a protected characteristic they have or are thought to have, or because they associate with someone who has a protected characteristic.

Indirect discrimination occurs when a condition, rule, policy or practice in your organisation that applies to everyone disadvantages people who share a protected characteristic.

Harassment is “unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual”.

Victimisation occurs when an employee is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act; or because they are suspected of doing so. An employee is not protected from victimisation if they have maliciously made or supported an untrue complaint.

2 The protected characteristics are:

Age – e.g. a person belonging to a particular age or a range of ages (for example 18 to 30 year olds).

Disability - a person has a disability if she or he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Gender reassignment - the process of transitioning from one gender to another.

Marriage and civil partnership

Pregnancy and maternity

Race - refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

Religion and belief - has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (such as Atheism).

Sex - a man or a woman.

Sexual orientation - whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

3 The Act specifies that having due regard to the need to advance equality of opportunity might mean:

- Removing or minimizing disadvantages suffered by people who share a relevant protected characteristic that are connected to that characteristic;
- Taking steps to meet the needs of people who share a relevant protected characteristic that are different from the needs of others;
- Encouraging people who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such people is disproportionately low.

4 Having due regard to the need to foster good relations between people and communities involves having due regard, in particular, to the need to (a) tackle prejudice, and (b) promote understanding.