

General Equality Impact Assessment (EIA) Form

Support:

An [EIA toolkit](#), [workshop content](#), and guidance for completing an [Equality Impact Assessment \(EIA\) form](#) are available on the [EIA page](#) of the [EDI Internal Hub](#). Please read these before completing this form.

For enquiries and further support if the toolkit and guidance do not answer your questions, contact the Equality, Diversity, and Inclusion (EDI) team by emailing Equalities@Brighton-Hove.gov.uk. If your request is urgent, please mention this in the subject line of your email so we can support as required.

Processing Time:

- EIAs can take up to 10 business days to approve after a completed EIA of a good standard is submitted to the EDI Business Partner. This is not considering unknown and unplanned impacts of capacity, resource constraints, and work pressures on the EDI team at the time your EIA is submitted.
- If your request is urgent, we can explore support exceptionally on request.
- We encourage improved planning and thinking around EIAs to avoid urgent turnarounds as these make EIAs riskier, limiting, and blind spots may remain unaddressed for the 'activity' you are assessing.

Process:

- Once fully completed, submit your EIA to the Equalities team by emailing the Equalities inbox and copying in your Head of Service, Business Improvement Manager (if one exists in your directorate), any other relevant service colleagues to enable EIA communication, tracking and saving.
- Your EIA will be reviewed, discussed, and then approved by the assigned EDI Business Partner and after seeking additional approval as appropriate for your EIA.
- Only approved EIAs are to be attached to Committee reports. Unapproved EIAs are invalid.

1. Assessment details

Throughout this form, 'activity' is used to refer to many different types of proposals being assessed.

Read the [EIA toolkit](#) for more information.

Name of activity or proposal being assessed:	Red Route – Western Road
Directorate:	City Services
Service:	Parking Services
Team:	Parking Projects
Is this a new or existing activity?	New
Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	Yes – EEC51 Red Routes Experimental

2. Contributors to the assessment (Name and Job title)

Responsible Lead Officer:	Flora McLeod, Senior Parking Projects Officer
Accountable Manager:	Peter Turner, Senior Parking Projects Manager
Additional stakeholders collaborating or contributing to this assessment:	James Ingle, Parking Projects Support Officer

3. About the activity

Briefly describe the purpose of the activity being assessed:

After the public consultation and successful implementation of the Experimental Traffic Regulation Order (ETRO) Red Routes on Lewes Road and London Road, the Parking Projects team received a number of emails supporting the scheme and asking for further red routes within the city. This equality impact assessment will grow as the project progresses and following our public consultation.

The focus of this EIA is to ensure that all impacts relating to the listed below groups are identified and considered within the scope of the project, funding availability and realistic ability to mitigate. This will include accessibility to loading and parking provisions, how to reduce concerns with exemption information and unfair penalisation.

What are the desired outcomes of the activity?

Objective 1: To reduce congestion and make travel easier and safer for all road users. A Red Route on Western Road is anticipated to reduce congestion through CCTV monitoring and issuing Penalty Charge Notices (PCNs) to nuisance loading and stopped vehicles.

Objective 2: To help the city work towards its carbon net zero objectives by reducing emissions and improving air quality as outlined in the corporate plan (Source: [Brighton & Hove City Council plan 2023 to 2027](#)). Prohibition of stopping directly reduces obstructions caused dangerous loading and nuisance parking through strict enforcement helping to reduce emissions from congested traffic and improving air quality. This is especially important as Western Road is a Low Emissions Zone.

Which key groups of people do you think are likely to be affected by the activity?

Age, Disability, Expatriates, Migrants, Asylum Seekers, Refugees, and Carers

4. Consultation and engagement

What consultations or engagement activities have already happened that you can use to inform this assessment?

- For example, relevant stakeholders, groups, people from within the council and externally consulted and engaged on this assessment. **If no consultation** has been done or it is not enough or in process – state this and describe your plans to address any gaps.

Pre-engagement consultation

An online pre-engagement consultation was carried out to collect feedback on the initial design for the proposed Red Route. Leaflets containing the design and supporting information were distributed to households and businesses within the affected area, promoting the consultation and signposting

residents to the online survey. The design materials were also made available on the *Your Voice* platform. This platform has been tested for accessibility and ongoing improvements are made where necessary.

To support accessibility and inclusion, respondents were offered the option to request paper surveys by telephone, which could be returned by post via a pre-paid envelope. The option for the leaflet to be printed in other languages, formats such as easy read, large print, Braille or BSL was explained on the leaflets. In person requests were not explicitly offered at this time however we expect to meet residents and businesses through request throughout the project. Attendance to the Disabled Car User Advisory Group meetings (as outlined below) are held online via zoom at the request of the meeting organiser as this format best suits the accessibility needs of the group.

Analysis of the pre-engagement consultation feedback has been completed and due to be presented to members at Informal Cabinet. Once reviewed, the findings will be incorporated into this Equality Impact Assessment to inform the understanding of potential impacts on groups with protected characteristics.

Disabled Car User Advisory Group (DCUAG)

- **4 June 2025** – Red Routes Special
- **26 September 2025** – Red Route Workshop (Part 1)
- **7 October 2025** – Red Route Workshop (Part 2)
- Regular attendance at the bimonthly DCUAG meetings to provide project updates and listen to concerns.

During these sessions, officers presented the proposals and gathered feedback. The group highlighted that the introduction of a red route could impact disabled people's access to Western Road, including attending healthcare and other appointments, undertaking everyday shopping/leisure, receiving deliveries, and potential increases in taxi costs.

Across the two workshop meetings, officers shared visual maps of the existing Western Road layout and invited comments on suitable locations for disabled parking bays.

Constructive input from the group informed the decision to apply a maximum stay of three hours for all disabled bays along the proposed route. This measure aims to prevent long stay blue badge parking and improve availability for those who need access most.

Western Road Local Action Team (LAT) group

4 June 2025 – Western Road LAT Meeting

Officers attended this meeting to support Councillors in responding to residents and businesses concerns regarding the proposed Red Route. Discussions focused on how the proposals might affect businesses, including impacts on trading, access for customers, and receiving deliveries.

10 September 2025 – Western Road LAT Meeting: Red Route Workshop

Officers facilitated a workshop with residents and businesses, providing printed maps of the existing street layout and inviting feedback on preferred locations for loading and disabled bays. Officers also explained where restrictions must be applied, near crossings, bus stops, and junctions.

Officers will continue to attend DCUAG and LAT meetings throughout the project. Should the Red Route be implemented, this engagement will continue during the first six months of the Experimental Traffic Regulation Order.

Equalities data from the consultation:

Out of 1,032 participants 567 agreed to answer the equalities monitoring questions. The questions and answers follow below.

What is your age?	Responses
18 - 24	14
25 - 34	76
35 - 44	94
45 - 54	137
55-64	137
65 - 74	81
75 - 85	21
85+	1
Prefer not to say	3

A total of 564 responses were received across a range of age groups:

- 14 respondents were aged 18 to 24
- 76 respondents were aged 25 to 34
- 94 respondents were aged 35 to 44
- 137 respondents were aged 45 to 54
- 137 respondents were aged 55 to 64
- 81 respondents were aged 65 to 74
- 21 respondents were aged 75 to 85
- 1 respondent was aged 85 and over
- 3 respondents preferred not to say

Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?	Responses
Yes, a lot	45
Yes, a little	78
No	425
Prefer not to say	1

Respondents were asked whether their day-to-day activities are limited by a health problem or disability lasting, or expected to last, at least 12 months:

- 45 respondents said their activities are limited a lot
- 78 respondents said their activities are limited a little
- 425 respondents said their activities are not limited
- 1 respondent preferred not to say

Are you a carer?	Responses
Yes	46
No	506
Prefer not to say	13

Respondents were asked whether they are a carer:

- 46 respondents said they are a carer
- 506 respondents said they are not a carer
- 13 respondents preferred not to say

Is the gender you identify with the same as your sex registered at birth?	Responses
Yes	535
No	7
Prefer not to say	19

Respondents were asked whether the gender they identify with is the same as their sex registered at birth:

- 535 respondents said Yes
- 7 respondents said No
- 19 respondents preferred not to say

How would you describe your ethnic origin?	Responses
Asian / Asian British: Chinese	1
Asian / Asian British: Indian	3
Asian / Asian British: Other	5
Black / Black British: African	3
Black / Black British: Caribbean	3
Mixed: Any other mixed / multiple ethnic background	5
Mixed: Asian and White	7
Mixed: Black African and White	1
Mixed: Black Caribbean and White	3
Other ethnic group, please describe	1
Other Ethnic Group: Arab	4
White: English, Welsh, Scottish, Northern Irish, British	434
White: Gypsy or Irish Traveller	1
White: Other	57
Prefer not to say	22

Respondents were asked to describe their ethnic origin:

- 1 respondent identified as Asian or Asian British: Chinese
- 3 respondents identified as Asian or Asian British: Indian
- 5 respondents identified as Asian or Asian British: Other
- 3 respondents identified as Black or Black British: African
- 3 respondents identified as Black or Black British: Caribbean
- 5 respondents identified as Mixed: any other mixed or multiple ethnic background
- 7 respondents identified as Mixed: Asian and White

- 1 respondent identified as Mixed: Black African and White
- 3 respondents identified as Mixed: Black Caribbean and White
- 1 respondent selected other ethnic group (not specified)
- 4 respondents identified as Arab (Other ethnic group)
- 434 respondents identified as White: English, Welsh, Scottish, Northern Irish or British
- 1 respondent identified as White: Gypsy or Irish Traveller
- 57 respondents identified as White: Other
- 22 respondents preferred not to say

What is your religion or belief?	Responses
Agnostic	16
Atheist	56
Buddhist	8
Christian	96
Hindu	1
Jain	1
Jewish	4
Muslim	4
Pagan	2
Other philosophical belief	10
Other religion or belief, please describe	16
Prefer not to say	24

Respondents were asked about their religion or belief:

- 16 respondents identified as agnostic
- 56 respondents identified as atheist
- 8 respondents identified as Buddhist
- 96 respondents identified as Christian
- 1 respondent identified as Hindu
- 1 respondent identified as Jain
- 4 respondents identified as Jewish
- 4 respondents identified as Muslim
- 2 respondents identified as Pagan
- 10 respondents identified as having another philosophical belief
- 16 respondents selected another religion or belief (not specified)
- 24 respondents preferred not to say

The equality monitoring data presented above is self-reported and based on consultation responses only therefore may not be fully representative of all affected groups. Ongoing engagement of the proposed scheme will support the identification and management of any equality-related impacts as the project progresses. This will include continued engagement the DCUAG, alongside any other communication with residents, visitors and businesses through emails, meetings, on-site visits where appropriate, and LAT meetings.

5. Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this activity?
 Consider all possible intersections.

(State Yes, No, Not Applicable as appropriate)

Age	No
Disability and inclusive adjustments, coverage under equality act and not	No
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	No
Religion, Belief, Spirituality, Faith, or Atheism	No
Gender Identity and Sex (including non-binary and Intersex people)	No
Gender Reassignment	No
Sexual Orientation	No
Marriage and Civil Partnership	No
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	No
Armed Forces Personnel, their families, and Veterans	No
Expatriates, Migrants, Asylum Seekers, and Refugees	No
Carers	No
Looked after children, Care Leavers, Care and fostering experienced people	No
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	No
Socio-economic Disadvantage	No
Homelessness and associated risk and vulnerability	No
Human Rights	No
Another relevant group (please specify here and add additional rows as needed)	No

Additional relevant groups that may be widely disadvantaged and have intersecting experiences that create exclusion and systemic barriers may include:

- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy, numeracy and /or digital barriers
- People on a low income and people living in the most deprived areas
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery
- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

If you answered “NO” to any of the above, how will you gather this data to enable improved monitoring of impact for this activity?

Gathering equalities data for road users is limited, as road use is transient and anonymous, and personal data on protected characteristics cannot be captured through observational or traffic data. This EIA therefore uses a combination of local demographic data and engagement with representative groups to identify and assess potential impacts on protected groups.

What are the arrangements you and your service have for monitoring, and reviewing the impact of this activity?

- Regular review of feedback from affected groups
- Monitor traffic flow and air quality improvements
- Track public transport reliability
- Review accident statistics
- Assess impact on local businesses
- Regular consultation with stakeholder groups

6. Impacts

Advisory Note:

- **Impact:**
 - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination), and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
 - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean:** Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only** the cumulative assessment section.
- **Data analysis and Insights:**
 - In each protected characteristic or group, in answer to the question ‘If “YES”, what are the positive and negative disproportionate impacts?’, describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
 - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and intersecting populations impacted by your activity, especially considering for [Health inequalities](#), review guidance and inter-related impacts, and the impact of various identities.
 - For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
 - **Consider a wide range (including but not limited to):**
 - [Population and population groups](#)
 - [Census 2021 population groups Infogram: Brighton & Hove by Brighton and Hove City Council](#)
 - [Census](#) and [local intelligence data](#)

- Service specific data
 - Community consultations
 - Insights from customer feedback including complaints and survey results
 - Lived experiences and qualitative data
 - [Joint Strategic Needs Assessment \(JSNA\) data](#)
 - [Health Inequalities data](#)
 - Good practice research
 - National data and reports relevant to the service
 - Workforce, leaver, and recruitment data, surveys, insights
 - Feedback from internal 'staff as residents' consultations
 - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
 - Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.
- Learn more about the [Equality Act 2010](#) and about our [Public Sector Equality Duty](#).

6.1 Age

Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: people who may be housebound, those under 16, young adults, with other intersections.	YES
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If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

As identified in the [2021 census](#), the majority of Brighton and Hove City's population is aged 16-66 years of age, with:

- 15% under 16 years old
- 72% being 16 - 66 years old.
- 10% being 67- 84 years old.
- 2% being 85 or older.

Positives

- By being able to enforce no parking along Red Routes carriageway obstructions will be reduced providing a safer environment for road users of all ages.
- Improvement of journey times and reliability will positively impact all age groups
- Local air quality can be improved through reduced idling emissions supporting improved/sustained health of all ages - Improved air quality particularly benefits older people and young children who are more vulnerable to respiratory issues.
- More reliable bus services benefit older people who are more dependent on public transport

Negatives

- Lack of understanding of how Red Routes work with no stopping and the use of loading bay maybe harder to understand for older people who are more used to previous road conditions
- May impact elderly people being dropped off/picked up by family/carers

6.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability , considering our anticipatory duty ?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

- 19.5% of Brighton and Hove’s population are disabled under the Equality Act:
- 8% experience day to day activities being limited a lot.
- 11.5% experience day to day activities being limited a little.
- There are 13,255 Blue Badge holders in Brighton and Hove.
- There are 8,894 disabled bus pass holders.

[Disability age standardised - Census Maps, ONS](#)

Positives

- Ease of traffic flow allows for safer roads
- Local air quality can be improved through reduced idling emissions
- Some disabled people rely on carers to travel safely and easily around the city.
- Loading bays allow stopping providing enough time for carers to pick up and drop off disabled clients
- Improved traffic flow benefits emergency vehicle access
- Better air quality benefits those with respiratory conditions
- Clearer road layout improves safety for people with visual impairments

Negative

- People with sight impairments can be affected by difficulties navigating and seeing changes to signage, barriers, and judging distances from other people.
- New restrictions being introduced can be anxiety-inducing for some people with mental health issues or neurodivergence due to uncertainty around the changes and rules.
- Relining works could cause disruption and works vans could be blocking spaces which could be used by Blue Badge holders.
- May impact those requiring door-to-door transport services, especially those who are housebound and rely on cars for everyday activities.
- Could affect those who need frequent rest stops due to mobility issues

What [inclusive adjustments](#) are you making for diverse disabled people impacted? For example: those who are housebound due to disability or disabling circumstances, D/deaf, deafened, hard of hearing, blind, neurodivergent people, those with non-visible disabilities, and with access requirements that may not identify as disabled or meet the legal definition of disability, and have various intersections (Black and disabled, LGBTQIA+ and disabled).

- Any consultation will be sent with an option to have the text in Braille, by phone, option for postal engagement and Your Voice, with a reasonable amount of time given for all responses. There will also be a number that anyone wishing to respond to the consultation can request a paper copy of the questions.
- Identify disabled parking bay provision on nearby side roads. - Completed along with a study showing a 50m radius between each proposed disabled bay in the Red Route design and on adjoining side streets.

- Meet with disability groups (Disabled Car Users' Group [DCUG], BADGE & Possability People) to discuss the Red Route and any issues they may have and specific needs and explore mitigations to reduce any disproportionate negative impacts
- Include our consultation findings and mitigation plans in a review and update of this EIA
- Blue Badge holders can be picked up or dropped off, so long as the vehicle is not parked. We will use discretion in cases where, for example, a wheelchair is being taken out of a vehicle.
- Implement clear signage
- When enforcement commences a minimum of a two-week period of warning letters followed by a two-week period of non-enforcement will alert any habitual illegal parking

6.3 Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers):

Does your analysis indicate a disproportionate impact relating to ethnicity?	NO
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If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

This protected characteristic was consciously considered as part of this assessment. Based on the nature of the proposal, available local demographic data, engagement undertaken to date, and the fact that the restrictions apply universally to all road users, no evidence has been identified at this stage to indicate a disproportionate negative impact compared with the general population. This position will be kept under review as the project progresses.

6.4 Religion, Belief, Spirituality, Faith, or Atheism:

Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?	NO
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If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

This group was considered as part of the assessment, and no evidence has emerged from available data or engagement to suggest a disproportionate negative impact at this stage. Impacts will continue to be reviewed as monitoring and engagement progress.

6.5 Gender Identity and Sex:

Does your analysis indicate a disproportionate impact relating to Gender Identity and Sex (including non-binary and intersex people)?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.6 Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Reassignment?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.9 Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum):

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

- 88.1% of households have all adults with English as their main language.
- 5.4% of households have at least one adult with English as their main language.
- 1% of households have at least one person aged 3-15 with English as their main language but no adults.
- 5.4% of households have no people that have English as their main language. [Census ONS](#)
- 20% of residents were born outside of the UK. [Council Plan 2023 to 2027.pdf](#)

Positives

- Ease of traffic flow allows for safer roads
- Local air quality can be improved through reduced idling emissions

Negatives

- New restrictions being introduced can be anxiety inducing due to uncertainty around the changes and rules
- Non translated materials can cause anxiety, frustration, and information to not be conveyed fully

- Individuals who do not use English as their main language could be excluded if consultation materials are not appropriately translated
- Lack of consultation time could lead to exclusion for minority groups

6.12 [Carers](#):

Does your analysis indicate a disproportionate impact relating to Carers (Especially considering for age, ethnicity, language, and various intersections).	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

- As of 15/10/2024 there are 3205 active Professional Carers Permits issued by Brighton & Hove City Council. These are permits issued by Brighton and Hove City Council to allow Professional Carers to park in any controlled parking zone within Brighton and Hove.
- Drivers with a valid blue badge can pick up and drop off on a Red Route.
- 1 in 12 residents provide unpaid care.

Positive

- Ease of traffic flow improves road safety and allows for safer roads
- Local air quality can be improved through reduced idling emissions
- Loading bays allow stopping providing enough time for carers to pick up and drop off people who are being cared for

Negative

- Potential for lack of loading and unloading spaces for carers to be able to drop off the person being cared for
- Potential for lack of disabled bays making it difficult for those with disabilities and for carers
- Having enough time in loading bays for carers to pick up or drop off cared for people in loading bays
- Loading bays not being close enough to the destination for those needing to be cared for

Mitigating action for negative impact

Discretion is used when monitoring activity on a Red Route and will be used to make a case-by-case decision on whether a ticket is issued.

6.13 Looked after children, Care Leavers, Care and fostering experienced people:

Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections). Also consider our Corporate Parenting Responsibility in connection to your activity.	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.14 Homelessness:

Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)

NO

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.15 Domestic and/or Sexual Abuse and Violence Survivors, people in vulnerable situations:

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?

NO

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.16 Socio-economic Disadvantage:

Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections)

YES

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

- 4.3% of the population of Brighton and Hove are deprived in 3 dimensions according to the Census 2021 data.
- 36.2% of the households in Brighton and Hove are economically inactive according to the [Census 2021](#) data.

Positive

- Ease of traffic flow and designated bays allows for safer roads with clearer line of sight of traffic
- 7,000 disabled people in the city have free bus passes and rely on buses to travel safely and easily around the city, and bus reliability is expected to improve.
- Red routes, loading and disabled bays provide for enough time for carers to pick up and drop off disabled clients
- Improved traffic flow benefits emergency vehicle access
- Clearer road layout improves safety for people with visual impairment

Negative

- People with sight impairments can be affected by difficulties navigating and seeing changes to signage, barriers, and judging distances from other people.
- New restrictions being introduced can be anxiety-inducing for some people with mental health issues or neurodivergence due to uncertainty around the changes and rules.
- Changes to restrictions could limit access by Blue Badge holders with severe mobility issues to some locations within the scheme area.
- May impact those requiring door-to-door transport services
- Could affect those who need frequent rest stops due to mobility issues

Mitigating Action for negative impact

- When enforcement commences a minimum of a two-week period of warning letters followed by a two-week period of non-enforcement will alert any habitual illegal parking.

6.17 Human Rights:

Will your activity have a disproportionate impact relating to Human Rights?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

No disproportionate negative impact identified for this group at this time.

6.18 Cumulative, multiple [intersectional](#), and complex impacts (including on additional relevant groups):

What cumulative or complex impacts might the activity have on people who are members of multiple Minoritised groups?

- For example: people belonging to the Gypsy, Roma, and/or Traveller community who are also disabled, LGBTQIA+, older disabled trans and non-binary people, older Black and Racially Minoritised disabled people of faith, young autistic people.

- Also consider wider disadvantaged and intersecting experiences that create exclusion and systemic barriers:
 - People being housebound due to disabilities or disabling circumstances
 - Environmental barriers or mobility barriers impacting those with sight loss, D/deafness, sensory requirements, neurodivergence, various complex disabilities
 - People experiencing homelessness
 - People on a low income and people living in the most deprived areas
 - People facing literacy, numeracy and/or digital barriers
 - Lone parents
 - People with experience of or living with addiction and/ or a substance use disorder (SUD)
 - Sex workers
 - Ex-offenders and people with unrelated convictions
 - People who have experienced female genital mutilation (FGM)
 - People who have experienced human trafficking or modern slavery

- Residents, business owners, traders and visitors will be impacted by the changes a Red Route brings. Though these impacts will be felt more or less by certain groups outlined in this assessment.
- Safer walking and cycling routes, along with improved public transport networks will provide alternatives to increasingly unaffordable car ownership.
- Overall vehicle access to Western Road could be impacted due to changes in ability to stop on the roadside.
- Work with representative groups in the city to understand transport and travel issues/concerns for protected groups and key local groups.

7. Action planning

What SMART actions will be taken to address the disproportionate and cumulative impacts you have identified?

- Summarise relevant SMART actions from your data insights and disproportionate impacts below for this assessment, listing appropriate activities per action as bullets. (This will help your Business Manager or Fair and Inclusive Action Plan (FIAP) Service representative to add these to the Directorate FIAP, discuss success measures and timelines with you, and monitor this EIA's progress as part of quarterly and regular internal and external auditing and monitoring)

- Conduct accessible and inclusive consultation and engagement on the Red Route proposal by 21/10/2025 and update this EIA with consultation findings to inform decision making at 15/12/2025 meeting.
- Contact disability groups BADGE, Possibility People and Disabled Car Users Group when consultation is carried out to consult over the Red Route in Western Road and better understand the impacts of the proposed project on disabled people. - Completed 24.11.2025
- Ensure those who English is not their first language have access to consultation for the Red Routes. This will be measured in replies received from those who do not use English as their first language or do not speak English or from different ethnic backgrounds. We will measure this at the end of consultation.
- Include our consultation findings and associated mitigation plans in a review and update of this EIA. Updated in section 4 as of 15/04/2026.
- The proposed Red Route would be implemented under an Experimental Traffic Regulation Order (ETRO) which means that changes can be made quickly in response to feedback, when

appropriate, much quicker than a formal Traffic Regulation order. The first 6 months of the ETRO will be another consultation period where we will be recording feedback.

- During the first few weeks of enforcement of the proposed Red Route there will be extra provision of Civil Enforcement Officers patrolling side roads off Western Road to discourage displacement or new anti-social parking.
- Monitor and review the location, availability, and time limits of proposed disabled and loading bays along and adjacent to Western Road. The project team have gathered feedback from the DCUG on the ideal time limit for disabled bays on Western Road which has informed the design. This will continue to be monitored throughout the project and into the ETRO period. Ahead of implementation project team to arrange clear and informative information via comms explaining the upcoming changes, loading arrangements and new disabled provision. To also include the enforcement approach in this. This information to be accessible and able to be provided in alternative formats when required. This information will also be relayed at the DCUAG meetings.
- Continue structured engagement with disability and carer representative groups to identify access issues, test mitigations, and inform adjustments during the experimental phase. At least one project officer to join the DCUG meetings by monthly and respond to queries/concerns as well as complete any actions for the team. This will be continued during the ETRO period.
- Review this Equality Impact Assessment using feedback, monitoring data, and engagement findings to assess whether mitigation measures remain effective. EIA to be regularly updated with oversight and input from the Equalities team. This is to be continued through the ETRO process.

Which action plans will the identified actions be transferred to?

- For example: Team or Service Plan, Local Implementation Plan, a project plan related to this EIA, FIAP (Fair and Inclusive Action Plan) – mandatory noting of the EIA on the Directorate EIA Tracker to enable monitoring of all equalities related actions identified in this EIA. This is done as part of FIAP performance reporting and auditing. Speak to your Directorate's Business Improvement Manager (if one exists for your Directorate) or to the Head of Service/ lead who enters actions and performance updates on FIAP and seek support from your Directorate's EDI Business Partner.

Western Road Project team plan

8. Outcome of your assessment

What decision have you reached upon completing this Equality Impact Assessment? (Mark 'X' for any ONE option below)

Stop or pause the activity due to unmitigable disproportionate impacts because the evidence shows bias towards one or more groups.	
Adapt or change the activity to eliminate or mitigate disproportionate impacts and/or bias.	
Proceed with the activity as currently planned – no disproportionate impacts have been identified, or impacts will be mitigated by specified SMART actions.	X
Proceed with caution – disproportionate impacts have been identified but having considered all available options there are no other or proportionate ways to achieve the aim of the activity (for example, in extreme cases or where positive action is taken). Therefore, you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision.	

If your decision is to "Proceed with caution", please provide a reasoning for this:

Summarise your overall equality impact assessment recommendations to include in any committee papers to help guide and support councillor decision-making:

Throughout this EIA it has become clear that there is a need for Red Route specific consultation. Consultation will be required to allow the local population to address any concerns with the Red Routes and so that people will be aware of new restrictions in the area. Publicity will also be required to make the wider public aware of the new Red Routes, the restrictions loading/disabled bays.

Overall, the project will have a positive impact on the area, improving road safety and air quality by reducing idling emissions. This is in line with the council's commitment to be a Carbon Neutral City by 2030.

9. Publication

All Equality Impact Assessments will be published. If you are recommending, and choosing not to publish your EIA, please provide a reason:

10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Flora McLeod, Senior Parking Projects Officer	29/04/2026
Accountable Manager:	Peter Turner, Senior Parking Projects Manager	29/04/2026

Notes, relevant information, and requests (if any) from Responsible Lead Officer and Accountable Manager submitting this assessment:

EDI Review, Actions, and Approval:

Equality Impact Assessment sign-off

EDI Business Partner to cross-check against aims of the equality duty, public sector duty and our civic responsibilities the activity considers and refer to relevant internal checklists and guidance prior to recommending sign-off.

Once the EDI Business Partner has considered the equalities impact to provide approval for by those submitting the EIA, they will get the EIA signed off and sent to the requester copying the Head of Service,

Business Improvement Manager, [Equalities inbox](#), any other service colleagues as appropriate to enable EIA tracking, accountability, and saving for publishing. Budget and Staffing EIAs secure EDI Manager and HEad of Service level approval via different templates.

Signatory:	Name:	Date: DD-MMM-YY
EDI Business Partner:	Zofia Danin	11-Jun-2026
EDI Manager:	Lindsey Pearce	29-Jul-2026

Notes and recommendations from EDI Business Partner reviewing this assessment:

Notes and recommendations (if any) from EDI Manager reviewing this assessment: